

U.S.-Mexico Cooperation on Counternarcotics and Transnational Crime

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The across-the-board geographic, economic, and demographic links to Mexico and the United States have made clear that it is in the national security interest of both parties to reduce the threats crime and violence have imposed on their societies.¹ Drug trafficking and criminal organizations in the region have grown in size and strength over the last decade, fueled by a northward flow of illegal drugs and a southward flow of money and weapons.²

Drug-related murders and kidnappings have also increased significantly since President Felipe Calderón's inauguration in 2006, when he vowed to fight drug cartels and corruption. The drug organizations that were "warring with each other for control of key smuggling routes along the U.S.-Mexico border" have responded to the new government with unprecedented violence that claimed more than 6,000 lives in 2008.³

The shared acknowledgment of the gravity of the crisis has opened the door for the U.S. and Mexico to build up a new framework of bilateral security cooperation and to strengthen their efforts in counternarcotics and anti-crime. On drug violence, the two governments have agreed to work

¹ Antonio Garza, "Mexico's Security Efforts Deserve Strong Support," *Embassy of the United States in Mexico*, Press Release 07, 2007.

² David McKeeby, "Obama Boosts U.S.-Mexico Cooperation against Drug Cartels," *America. Gov.*, March 25, 2009, <http://www.america.gov/st/peacesec-english/2009/March/20090324165507idybeekcm0.1491815.html>.

³ *Ibid.*

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together on tracking and prosecuting the narcotics traffickers whose operations span both sides of the border.⁴ The U.S. has promised to strengthen its existing justice assistance programs, including helping to modernize courts and police forces in Mexico; it has also agreed to crack down on the flow of drug money, as well as the arms smuggling trade.⁵ Likewise, the Calderón administration is committed to revamping its judicial system and law enforcement institutions to further strengthen the efforts against drug trafficking and organized crime.

These commitments have translated into concrete actions. In October 2007, the United States and Mexico announced the Mérida Initiative, a multi-year proposal for \$1.4 billion in U.S. assistance to Mexico and Central America aimed at combating drug trafficking, gangs, and organized crime. On May 14, 2008, the House Committee on Foreign Affairs approved a bill, H.R. 6028, which would authorize \$1.6 billion for the Initiative from FY2008 through FY2010. In June 2009, the U.S. Congress approved \$420 million in additional funds for the Mérida Initiative in an emergency spending bill. Another emergency spending bill, approved in February 2009, authorized \$10 million to hire additional Alcohol, Tobacco, & Firearms (ATF) inspectors under the agency's Project Gunrunner, which tries to identify gun dealers who are intentionally selling arms to Mexican drug traffickers.⁶

However, despite all the success achieved by both governments through their bilateral security cooperation that focuses on combating organized crime and drug trafficking, it is too early to draw the conclusion that the current framework for U.S.-Mexico bi-national cooperation in counternarcotics and anticrime is effective and efficient; there exist intrinsic shortcomings that would be detrimental to the long-term success of this cooperation. In addition to the strengthened assistance to modernize military forces and information technology, more attention should be paid to the institutions and rule-of-law development in Mexico, which are now the major barriers to the success of bilateral security strategies.

This study intends to provide an initial assessment of the current bilateral efforts against drug trafficking and organized crime, or in a broader sense, of the U.S.-Mexico security cooperation. While applauding the combined efforts and the existing achievements, it will draw attention to some potential obstacles to the further successful operation of this grant strategy. The study will first briefly review the current status of the security conditions in the two neighboring countries and provide a broad overview of U.S.-Mexico bilateral security cooperation. The study will then analyze the rationale from both governments for their combined efforts and strategies in counternarcotics and anti-violence. It will introduce and evaluate some of

⁴ Andrew Selee, "Policy Update: Security. U.S.-Mexico Cooperation: A New Opportunity?" *American Quarterly*, Council of the Americas, July 23, 2009.

⁵ Selee 2009.

⁶ Data source: McKeeby 2009.

the most important components in the existing bi-national efforts against drug trafficking and heightened violence in Mexico, especially the breakthrough from the approval of the Mérida Initiative. The study will next highlight some of the potential shortcomings in the current security cooperation framework that could be detrimental to its long-term success. Finally, it will make recommendations for a better U.S.-Mexico security cooperation agreement.

The Rationale Behind U.S.-Mexico Security Cooperation

In the Calderón administration, U.S.-Mexican relations have been remarkably close, “with drug trafficking and violence, border security, and immigration continuing to define the bilateral relationship.”⁷ Mexico has become a central partner in U.S. efforts to combat drug trafficking, preempt terrorism, and handle other trans-border threats.⁸ Since taking office in December 2006, President Calderón has taken a courageous stand against the transnational criminals currently threatening Mexico, and reiterated his government’s willingness to work in cooperation with the United States to solve this issue. President Calderón has made combating the drug-trafficking organizations (DTOs) and drug violence a top priority of his administration. He has sent thousands of soldiers and police to drug-trafficking “hot-spots” throughout Mexico.⁹

A bilateral security cooperation framework will help create a safer and more secure hemisphere in which criminal organizations no longer threaten regional security and populations.¹⁰ It will also prevent the entry and spread of illicit drugs and terrorist threats throughout the region.¹¹ The most important action the U.S. can take in this regard is to partner with President Calderón in the struggle against spiraling drug violence. In addition, the U.S. is also obliged to substantially reduce its drug demand and improve controls on arms, cash, and precursor chemicals smuggled into Mexico.¹² Recently, the White House Office of National Drug Control Policy announced that the aggressive bi-national crackdown on drug trafficking and related violence has led to a substantial decline in the supply of cocaine and the consequent rise in drug prices in the U.S.¹³ This clearly justifies the U.S.-Mexico coordinated efforts.

⁷ Mark Sullivan, “Mexico-U.S. Relations: Issues for Congress,” *CRS Report RL32724*, May 1, 2009, p. 3.

⁸ Garza 2007, 1.

⁹ Jack Riley et al., “Security in Mexico: Implications for U.S. Policy Options,” RAND Corporation, 2009, Summary.

¹⁰ Raul Benitez, “Mexico and the New Challenges of Hemispheric Security,” *Woodrow Wilson Report on the Americas* 11 (2008): 50–51.

¹¹ Garza 2007, 3–4

¹² *Ibid.*

¹³ U.S. Department of Justice, National Drug Intelligence Center, “National Drug Threat Assessment 2009” (Washington, DC: Government Printing Office, December 2008).

Assessment of the U.S.-Mexico Bilateral Cooperation on Drug Trafficking and Heightened Violence in Mexico

Today, Mexico is the major producer and supplier to the U.S. market of heroin, methamphetamine, and marijuana.¹⁴ According to the State Department's 2009 International Narcotics Control Strategy Report, as much as 90 percent of the cocaine entering the United States now transits through Mexico. A small number of Mexican DTOs¹⁵ control the most significant drug distribution operations along the Southwest border; their criminal activities reach well beyond the towns and cities of the border, "extending along drug trafficking routes into cities throughout the United States."¹⁶

The *National Drug Threat Assessment* states that Mexico's DTOs now control most of the U.S. drug market, with distribution capabilities in 230 U.S. cities. The violence and brutality of these Mexican drug cartels has escalated as they battle over control of the multi-billion-dollar narcotics markets. Since early 2008 there has been an increase in assassinations of high-profile law enforcement officials, gruesome murders, violent kidnappings, growing use of a varied arsenal of high-powered weapons, and the indiscriminate killing of civilians.¹⁷ In 2008 more than 5,600 people in Mexico were killed in drug-trafficking violence, more than double the casualties of 2007.¹⁸

Each year the Mexican DTOs repatriate huge sums of illicit revenues from drug sales in the United States back to Mexico.¹⁹ The fact that the lion's share of this money is used to corrupt Mexican government officials has strengthened President Calderón's reliance on the military to combat drug cartels, which poses a major challenge for U.S.-Mexican law enforcement cooperation.²⁰

Mexican President Calderón defined combating the DTOs as the centerpiece of his administration shortly after taking office in December 2006. The Calderón government has devoted billions of dollars²¹ to the offensive against Mexico's entrenched drug-trafficking organizations, and deployed 45,000 soldiers and thousands of federal police in nearly a dozen of Mexico's states.²²

¹⁴ Sullivan 2009, 15–19.

¹⁵ Often referred to as "drug cartels."

¹⁶ Sullivan 2009, 15–19.

¹⁷ Riley et al. 2009.

¹⁸ Ibid.

¹⁹ The volume of cash generated by the trade is hard to quantify precisely. Estimates range from \$15 to \$25 billion a year to \$40 billion a year.

²⁰ Garza 2007, 3–4.

²¹ It is unclear precisely how much the Calderón government is spending on security. Estimates of \$9–\$11 billion have been reported.

²² Steve Fainaru and William Booth, "As Mexico Battles Cartels, the Army Becomes the Law," *Washington Post*, April 2, 2009.

U.S.-Mexico Cooperation on Counternarcotics and Transnational Crime

The American Congress has approved \$700 million in aid to date, under the Mérida Initiative – a \$1.4-billion multiyear partnership launched in 2007 and aimed at delivering training and equipment to counternarcotics cooperation, as well as technical assistance to help upgrade the legal system in Mexico.²³

The Mérida Initiative

“Increasing violence perpetrated by drug cartels, youth gangs, and other criminal groups is threatening citizen security and democracy in Mexico.”²⁴ However, Mexican government efforts to combat drug trafficking and organized crime have achieved little progress because of inadequate resources, corruption, and weak judicial systems.²⁵ The United States and Mexico issued a joint statement on October 22, 2007²⁶ announcing a multiyear plan, named the Mérida Initiative, for \$1.4 billion in U.S. assistance to Mexico and Central America to combat drug trafficking and criminal organizations.²⁷

The Mérida Initiative is designed to build on the existing projects in the region and to complement U.S. efforts at home to reduce drug demand, so as to “stop the flows of narcotics, bulk currency, and illegal weapons, and to confront gangs and criminal organizations.”²⁸ The overall objectives of the Initiative are to break the power and impunity of criminal organizations; strengthen border, air, and maritime border controls; combat gang activities; curtail the demand for illicit drugs throughout the region; and improve the capacity of judicial systems in Mexico.²⁹

Compared to previous regional efforts the Mérida Initiative is unique in that, first, it seeks to solve the issues of organized crime, drug trafficking,

²³ McKeeby 2009.

²⁴ Colleen Cook, “Merida Initiative: Proposed U.S. Anticrime and Counterdrug Assistance for Mexico and Central America,” *CRS RS22837*, March 18, 2008, p. 1.

²⁵ *Ibid.*

²⁶ The joint statement highlighted efforts of both countries, including Mexico’s 24 percent increase in security spending in 2007, and U.S. efforts to reduce weapons, human, and drug trafficking along the Mexican border. The statement cited several examples of such efforts to combat drugs and crime that are already in place. Those examples included the 2007 Southwest Border Counternarcotics Strategy, the 2008 National Drug Control Strategy, and the 2007 U.S. Strategy for Combating Criminal Gangs from Central America and Mexico.

²⁷ In terms of actual appropriations for Mexico under the Mérida Initiative, the Bush Administration requested \$500 million for Mexico in a FY2008 supplemental appropriations request and another \$450 million for Mexico in the FY2009 regular foreign aid request, for a total request of \$950 million. Ultimately Congress has appropriated a total of \$700 million to date for Mexico under the Mérida Initiative.

²⁸ Sullivan 2009, 19–20.

²⁹ Office of National Drug Control Policy, “National Southwest Border Counternarcotics Strategy,” June 2009, p. 42.

and associated violence in a multinational context.³⁰ While in the past these countries have blamed each other for “not doing enough to stop consumption, production or trafficking of illegal drugs,” the Initiative recognizes that each country must share in the responsibility for dealing with the serious public security and public health problems associated with illegal drugs, and must do so in a cooperative manner.³¹

Second, while the past cooperation has been largely limited to equipment and training for Mexico’s police and military, the Mérida Initiative marks the first time that Mexico has asked for U.S. assistance to strengthen its institutional capacity to cope with organized crime;³² it “goes beyond to include training and administrative help for Mexico’s civilian law enforcement agencies and justice sector.”³³

Last but not least, the Mérida Initiative is atypical in that it does not involve “budget support” or “cash payments” to any of the recipient countries. Instead it entails in-kind assistance in the form of equipment, training, and technical collaboration. This is an important distinction because the Mérida Initiative is designed as a cooperation strategy, not an assistance program.³⁴ For Mexico, the Initiative accounts for about 10 percent of what the government is already spending to fight organized crime.

Beyond the Mérida Initiative

In early 2009, U.S. Secretary of Homeland Security Janet Napolitano clarified in a congressional testimony that the United States has a “significant security stake” in helping Mexico’s efforts against the drug cartels and organized crime, with three major roles to play: “providing assistance to Mexico to defeat the cartels and suppress the flare-up of violence in Mexico; taking action on the U.S. side of the border to cripple smuggling enterprises; and guarding against and preparing for the possible spillover of violence into the United States.”³⁵

Beyond the various programs under the Mérida Initiative, the U.S. government is providing significant additional resources through several federal agencies to combat Mexican drug cartels and bolster border security. In late March 2009, the Department of Justice announced its increased efforts to combat Mexican drug cartels in the U.S. and to help strengthen Mexican

³⁰ Erin Olson, “Six Key Issues in U.S.-Mexico Security Cooperation,” *Woodrow Wilson Center*, 2008.

³¹ Kindra Mohr, “The Merida Initiative: An Early Assessment of U.S.-Mexico Security,” *Peterson Review* 8 (2008): 75-76.

³² Olson 2008.

³³ *Ibid.*

³⁴ Mohr 2008.

³⁵ Janet Napolitano, “Southern Border Violence: Homeland Security Threats, Vulnerabilities, and Responsibilities.” Testimony of Secretary Janet Napolitano before Senate Homeland Security and Governmental Affairs Committee, March 25, 2009.

http://www.dhs.gov/ynews/testimony/testimony_1237993537881.shtm.

law enforcement to battle the cartels back in Mexico. Deputy Attorney General David Ogden is leading a Mexican Cartel Strategy that uses federal prosecutor-led task forces to “identify and dismantle the cartels through investigation, prosecution, and extradition of their key leaders and facilitators.”³⁶

Renewed efforts are also underway to make the border less porous in a far more selective and targeted way than in the past. In April 2009 Alan Bersin took the position of border czar, with wide-ranging powers to get U.S. agencies working together on stemming the southbound flows of drug revenues and assault weapons. DHS Secretary Napolitano also allocated 360 additional customs inspectors along the border and has set up a mobile checkpoint to search southbound traffic for guns and cash.³⁷

In addition, the Office of Drug Control Policy has set up a comprehensive plan named “The National Southwest Border Counternarcotics Strategy” and instructs U.S. federal agencies along the Southwest border to coordinate their efforts to implement 68 objectives in the areas of intelligence collection and information sharing, interdiction at and between ports of entry, aerial surveillance and interdiction of smuggling aircraft, investigations and prosecutions, and countering financial crime.³⁸ Currently \$1.9 billion has been scheduled to implement this strategy.

Weapons Trafficking

The Bureau of Alcohol, Tobacco, and Firearms (ATF) estimates that 90 percent of the firearms recovered from crime scenes in Mexico were made in the U.S. and illegally smuggled into Mexico. However, although the biggest proportion of firearms trafficked to Mexico originated from U.S. southwestern states, especially Texas, Arizona, and California, the problem of illegal weapon trafficking is in fact pan-American, with guns originating as far east as Florida and as far north as Washington state.³⁹ Mexican drug cartels and gangs are relying on more powerful weapons, and “reportedly are buying semiautomatic versions of the AK-47 and AR-15 style assault rifles, and other military-style firearms in the United States.”⁴⁰ The cartels often obtain their weapons through “straw purchases” where legally qualified people buy the weapons from licensed gun dealers or at gun shows and sell them to smugglers who transport them across the border.

In 2005, ATF launched its Southwest Border Initiative to identify and destroy the firearms-trafficking infrastructure of criminal organizations working across the border. The cornerstone of the ATF’s efforts is “Project

³⁶ Sullivan 2009.

³⁷ Selee 2009, 2.

³⁸ Office of National Drug Control Policy, “National Southwest Border Counternarcotics Strategy,” June 2009.

³⁹ “ATF: Most Illegal Guns in Mexico Come from U.S.,” Associated Press, August 11, 2008.

⁴⁰ Olson 2008, 9–10.

Gunrunner,” which is designed to stem the flow of firearms into Mexico and thereby deprive the drug cartels of weapons.⁴¹ New programs to “share tracing capabilities, close off trafficking corridors, expand actionable, real-time intelligence cooperation and aggressively pursue prosecution” have resulted in marked increases in interdictions and arrests of smugglers seeking to move firearms across the border.⁴²

The Department of Homeland Security, especially Immigration and Customs Enforcement (ICE) and Customs and Border Protection (CBP), are also involved in the actions to stop the southbound flow of weapons to Mexico. Both ICE and CBP have the authority to enforce export provisions of the Arms Exports Control Act.⁴³ In collaboration with Mexican law enforcement authorities, ICE launched in June 2008 a new bilateral program against weapons smuggling, known as Operation *Armas Cruzadas*.⁴⁴ The program involves intelligence sharing and joint law enforcement efforts with vetted Mexican units.

Money Laundering

Money laundering is a kind of “circulatory system” that links illegal activity with the legal works of banking and business.⁴⁵ Proceeds from the sale of illegal drugs in the U.S. are the lifeblood of drug-trafficking organizations; this money not only enriches the DTOs, but allows them to acquire arms and personnel, and to execute corruption that ensures protection for their illegal enterprises.⁴⁶ Interrupting the flow of money from drug sales in the United States to Mexico, estimated to range from \$15 billion to \$25 billion a year, could be one of the most effective ways to disrupt the illegal activities of the drug cartels.

The money generated by the sale of illegal drugs in the United States is often put through a complex series of financial transactions in an attempt to launder it – that is, to bring it into the legitimate economy. Both U.S. and Mexican authorities believe that traffickers rely primarily on bulk cash smuggling to send illegal drug proceeds into Mexico.⁴⁷ In order to curb the flow of illicit bulk cash, several DOJ agencies are engaged in inter-departmental efforts with the Department of the Treasury and Department of Homeland Security to disrupt the illicit flow of money between Mexican DTOs and their U.S. operatives; with efforts ranging from “investigative task forces, inter-agency financial investigations training, and prevention of the

⁴¹ McKeeby 2009.

⁴² Garza 2007.

⁴³ Know more about Arms Export Control Act: <http://www.adc.org/PDF/AECA1976.pdf>.

⁴⁴ Sullivan 2009, 25–26.

⁴⁵ Riley 2009, 18–20.

⁴⁶ Olson 2008, 12.

⁴⁷ Ibid.

wholesale distribution of U.S. currency, to strategic partnerships between departments that increase outbound inspections by border agencies.”⁴⁸

Shortcomings in the Current Framework of U.S.-Mexico Security Cooperation

Despite the laudable efforts and achievements in the bilateral security cooperation in counternarcotics and anti-crime between the United States and Mexico, there exist intrinsic shortcomings in the design of the current security cooperation framework, and those problems could be detrimental to its further successful operation in the near future.

Imbalanced Assistance in the Mérida Initiative

The emphasis given in the Mérida Initiative to improve the technological capabilities of the Mexican government goes in the right direction. The achievement of security needs the latest technology. However, this effort will be useless if the Mexican government is not able to fight corruption in its governance and judicial systems.⁴⁹ The State Department’s 2008 Human Rights Report indicates that, “there is corruption, inefficiency, and lack of transparency in the Mexican judicial system,” as well as “impunity and corruption at all levels of government.”⁵⁰ Technological assistance to fight organized crime is very important, but if there is not a transformation of the institutions in Mexico, this battle will be unproductive.⁵¹ Not the highly advanced equipment or weapons systems, but the institutions and legislation building may ultimately play a more important role in Mexico’s efforts to defeat organized crime and lessen the extreme violence that has plagued the country.⁵² From this perspective, long-term cooperation between Mexico and the U.S. should include assistance for institution building in Mexico in the judiciary and the prison system.

However, the largest portion of the Mérida Initiative’s resources is still for costly equipment such as helicopters, surveillance planes, and high-tech detection equipment.⁵³ Within the Initiative’s law enforcement strategy, only one fifth of total funding is dedicated to institution and rule-of-law development, and even less than half of that money is budgeted for public security and law enforcement activities.⁵⁴ This underfunding problem has aroused wide concerns about the imbalanced distribution of the assistance package under the Mérida Initiative, which still focuses too heavily on

⁴⁸ Genaro García Luna, “Comprehensive Strategy for the Prevention and Fight against Crime,” Presentation, Center for Strategic and International Studies, Washington, DC, January 31, 2008.

⁴⁹ Garza 2007.

⁵⁰ 2008 Human Rights Report: Mexico, Bureau of Democracy, Human Rights, and Labor. 2008 Country Reports on Human Rights Practices.

⁵¹ Mohr 2008.

⁵² Sullivan 2009.

⁵³ Olson 2008, 1.

⁵⁴ Mohr 2008, 77.

hardware and equipment but not enough on judicial and police reform and institutional strengthening. "Equipment and technology will do little to bring the accountability, transparency and reform that Mexican security forces need to fight criminal groups over the long haul."⁵⁵

The One-Sided Character of the Mérida Initiative

Ironically, despite the efforts by the U.S. government to talk about the "shared responsibilities" in combating organized crime and insecurity along the Southwest border, the funding from the Mérida Initiative has no additional commitments or funds for actions to be taken on the U.S. side. Many studies have shown that treatment for heavy drug users is by far the most cost-efficient way to reduce drug demand in the U.S. But drug treatment in the U.S. has remained underfunded, with federal spending since 2002 growing at less than one quarter of the rate of spending on interdiction.⁵⁶ Compared to what the Mexican government is investing in counter-drug efforts, the U.S. contribution is a drop in the bucket.

Human Rights Violation of Mexican Military in Combating Organized Crime

Given the major concerns about the limited capacity of Mexico's civilian institutions to combat organized crime, mainly from police and the justice system, policymakers have increasingly claimed the Mexican military as a viable alternative.⁵⁷ However, the Mexican military's involvement in counternarcotics efforts seems to have been a mixed blessing. Critics fear that the current design of the Mérida Initiative "could contribute to the creation of a police state in Mexico," given the need of the government to combat the armament and intelligence capabilities of drug traffickers and criminal organizations, which frequently surpass the capacity of traditional law enforcement agencies.⁵⁸ Although the military has won plaudits and greater public acceptance for the ability to restore order in areas seriously threatened by cartel violence,⁵⁹ its increased involvement in open combat with well-armed and well-trained cartel forces has led to increased complaints of human rights violations by the military, including the alleged slayings of civilians and the illegal detention and abuse of people.⁶⁰

⁵⁵ Joy Olson, Testimony on the Merida Initiative before House Appropriations Committee Subcommittee on State, Foreign Operations and Related Programs, March 10, 2009.

⁵⁶ Sullivan 2009, 10-11.

⁵⁷ Olson 2008, 7.

⁵⁸ Mohr 2008, 76-77.

⁵⁹ Sara Miller Llana, "Military Abuses Rise in Mexican Drug War," *Christian Science Monitor*, June 24, 2008a.

⁶⁰ The number of complaints filed against Mexico's Department of Defense before Mexico's National Human Rights Commission more than doubled during the first year of the Calderón Administration, going from 182 in 2006 to 367 in 2007.

Conclusion

After evaluating the achievements and shortcomings of the current U.S.-Mexico bilateral cooperation against drug trafficking and organized crime, it is easy to draw the lesson that a better U.S.-Mexico security cooperation framework should include the strengthening of the institutions in both countries that are dedicated to combating security threats. Numerous institutions that play differing, yet equally vital, roles in targeting and combating various security threats should be put into serious consideration.⁶¹ The U.S. government could help Mexico further strengthen the Center for Investigation and National Security and its intelligence-gathering capability so that the agency could more effectively “counter the threats posed by non-state actors – terrorists, organized crime, criminal gangs, or the Mexican guerrilla movement.”⁶²

Also, a better U.S.-Mexico security cooperation agreement would have to be based on the principle that the governments of the United States and Mexico must undertake various collective, domestic measures to more successfully confront the threats posed to both nations by transnational organized crime – such as “drug trafficking, the diversion of chemical precursors for the illicit drug trade, human trafficking, weapon smuggling, money laundering,” etc.⁶³ Thus, the agreement would have to include both countries’ commitment to a common set of objectives and strategies, as well as an intensified level of cooperation, information sharing, and coordination between the respective agencies. In addition, the U.S. government is expected to allocate more resources for curtailing drug consumption at home so as to show its commitment in achieving the shared strategic objectives to combat drug-trafficking and illegal activities of drug cartels.

⁶¹ Olson 2008, 78–79.

⁶² Riley 2009.

⁶³ *Ibid.*