Homeland Security Investigations (HSI)

• HSI is the investigative arm of Immigration and Customs Enforcement
• HSI is responsible for investigating the illegal movement of people, goods and finances into, within and out of the United States
• HSI is the largest investigative arm in DHS and second largest federal investigative agency in the U.S.
Homeland Security Investigations (HSI)

7000 Homeland Security Investigations Special Agents assigned to 26 domestic Special Agent in Charge Offices
Within HSI is the Counter-Proliferation Investigations (CPI) Program

CPI conducts criminal enforcement of ALL U.S. Export Control Laws

According to a Department of Justice analysis, HSI was involved in over 73% of the major export enforcement and embargo related prosecutions between 2007 and 2012
Counter-Proliferation Investigations (CPI)

- CPI works with all of its federal partners in the enforcement of U.S. Export Control Laws
- HSI’s statutory customs border search authority allows for the search, detention and seizure of illegal exports
- HSI has the authority to investigate criminal violations of the ITAR (22 CFR § 127.4)
Homeland Security Investigations (HSI)

Project Shield America

Outreach Program to Academia to:

• Seek greater compliance and awareness of export control laws
• Prevent the inadvertent violation of export control laws in academia
• Seek cooperation from academic institutions in protecting controlled technology from illegal export and reverse engineering
• Establish more formal and informal dialogue through stronger government/academic partnerships
• Enhance U.S. National Security
The ICE Project CAMPUS Sentinel outreach initiative is aimed at preventing the criminal exploitation of the Student and Exchange Visitor Program (SEVP) by improving direct communications between Designated School Officials (DSO) and local Homeland Security Investigations (HSI) Agents.

ICE seeks to increase school officials’ knowledge of how regulatory requirements play heavily into criminal investigations and the role school officials may play in those investigations.

ICE seeks the assistance of school officials in conducting investigations of noncompliant schools and students.

ICE is also asking for assistance from school officials in identifying those who may be susceptible to recruitment, or radicalization, by groups or individuals wishing to harm the United States or its people.

**Benefits of Outreach**

- Increased awareness of the red flags indicating illegal schemes used by students and school officials.
- Decreased exploitation of the student visa granting process.
- Establishes a conduit for investigative information.
Potential Pitfalls

- Foreign students (visa issues, deemed exports, etc.)
- Student assignment w/out review or little oversight
- No physical access controls of research facilities
- Foreign travel / delegations / transporting digital media
- Foreign university partnerships
- Lack of export control training
- Faculty working on outside contracts (private agreements)
- Data exchanges
- Project staffing changes
Homeland Security Investigations (HSI)

**Recommendations**

- Create a university export control matrix or decision tree
- Create protocols for international mailing
- Maintain a list of sanctioned, proliferating and transshipment countries
- Work closely with the university designated school official (DSO)
- Create a policy on foreign travel and transport of digital media
Establish a collection of “clean” computers, USB flash drives, phones, and other digital media for the purpose of foreign travel

Incorporate an export control training course

Conduct annual review of university international shipments based on your university's freight forwarding account

Avoid desktop sharing software

Avoid “cracked” or pirated software

When in doubt, seek legal advice
Consequences of Non-Compliance

Criminal and civil penalties potentially resulting in:

• Millions of dollars in fines
• Jail sentences
• Damage to national security
• Loss of federal funding
• Loss of exporting privileges
• Loss of technological advantage through IP theft
• Damage to individual and institutional reputation
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