



# Post Incident Analysis (PIA)

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U.S. Customs and  
Border Protection

# Presentation Overview

- Definitions
- Gap and Vulnerability Trends
- Smuggling Trends
- Partner Responsibilities
- PIA Process and Outcomes



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# Definitions

## Security Breach

- An introduction of restricted, prohibited, or harmful cargo or people into the supply chain, which are in violation of CBP laws and regulations, or the laws and regulations of other government agencies.
- A security breach could be related to terrorism, narcotics, human smuggling, weapons, currency, intellectual property rights, health and safety, or other violations.



# Definitions

## Post Incident Analysis (PIA)

- An investigation that is conducted following a security breach involving a partner company to assess the chain of events that took place, determine factors that contributed to the breach, identify culpable parties, issue corrective action plans, and determine the account status of each partner involved.



# Gap and Vulnerability Trends

- Security procedures are not documented
- Employees are not trained properly on established procedures
- Established procedures not being followed
- Absence of checks and balances
- Internal conspiracies



# Gap and Vulnerability Trends

- Substandard inspections
- Lack of effective tracking and monitoring
- Sub-contracting controls
- Not actively engaging with supply chain business partners
- Lack of upper management support



# Smuggling Trends



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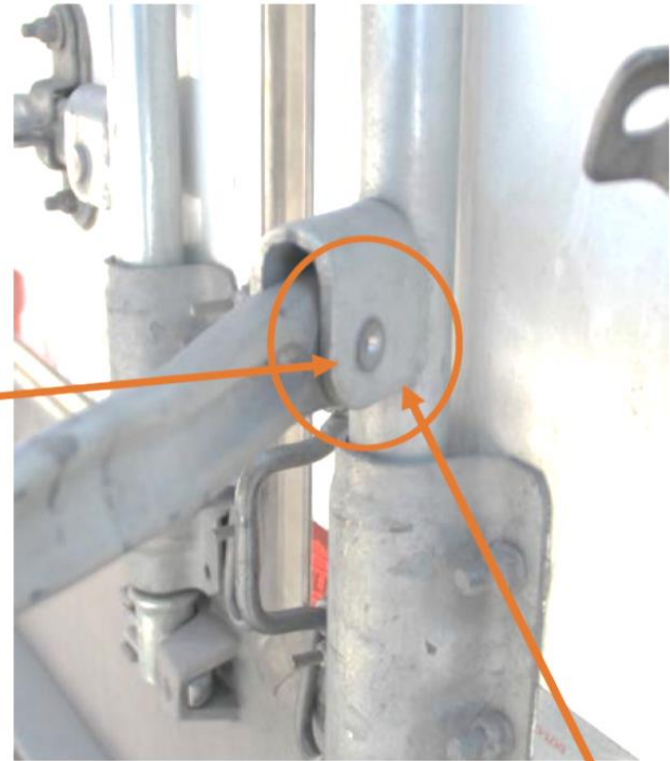
# Smuggling Trends



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# Smuggling Trends



Picture detail on factory standard rivet. Note: lightened for clarity



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# Smuggling Trends



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# Smuggling Trends



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# Smuggling Trends



**Legitimate Seal Numbers  
(Unused Spare Seal)**

Note extensive sanding scratches in the face of the forged seal.

“SEAL” size and font is very close but numbers differ.

Forged numbers are only slightly darker than the factory numbers.



**Forged Seal Numbers  
(Door Seal Cut by CBP)**



# Partner Responsibilities

- Notify CBP or appropriate law enforcement agency
- Conduct internal investigation
- Identify employees and business partners involved
- Gather pertinent information
  - Inspection sheets and seal logs
  - Site access logs
  - Tracking and monitoring records
  - Shipping documents
  - CCTV recordings and photos
- Cooperate with PIA process



# PIA Process

- PIA team assigned
- Identify all parties involved
- Send request for information
- Coordinate a site visit (if applicable)
- Determine factors that contributed to the security breach and culpable parties
- Recommend partner status
- Develop corrective action plans and follow up with companies



# PIA Outcomes

- No change of status
- Suspension
- Removal
- Reinstatement
  - Full reinstatement
  - Conditional reinstatement
  - Revisits
  - Unannounced visits





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