

Episode 14

Derrick Kyle: Welcome to the Torres Talks Trade podcast. My name is Derek Kyle and I'm a senior associate at Torres Trade Law, a national security and international trade law firm. This is my second time hosting an episode of the podcast. I'm just as excited as my first time around. I'm particularly excited about our guest today, Rob Dunikoski he's a partner at the law firm at Castaneda + Heidehman. Hi, Rob. Thanks for joining us.

Rob Dunikoski: Hey, Derek. Thanks, it's great to be here.

Derrick Kyle: Prior to Rob's current role in private practice, he spent nearly 15 years in the government as an attorney for the U.S. Department of Homeland Security with over 10 years as Deputy Chief Counsel at DHS as counsel for Homeland Security Investigations, call it HSI.

The last episode that I recorded covered Customs and Border Protection audits, CBP audits, and we've had a few other podcasts covering CBP topics. So, listeners are becoming familiar with CBP. CBP is an agency under the Department of Homeland Security and HSI, where Rob was council, is a parallel agency under DHS. DHS is a large agency. It's kind of an umbrella agency, made up of 22 separate agencies. Today we're going to stay focused on a few key areas of interest for our listeners. So, with that I think we'll jump right into it. Rob, please describe your background. What led you to work at the Department of Homeland Security and your role at DHS?

Rob Dunikoski: Sure. Thanks Derek. So, I've been a lawyer about 17 years. I started working in the federal courts, clerked for a U.S. District Judge here in Dallas. And then after that, I went on to do commercial litigation at a major international law firm. But kind of in my heart of hearts, I knew that I wanted to serve the federal government. I wanted to, if you remember back to that timeframe, the War on Terror was in full swing and I kind of knew I wanted to do something in the area of national security. So, pretty quickly, once I got to the big firm, I started looking and then I was grateful to get on Homeland Security early in my career. I started there in 2007 here in the Dallas office and worked there for nearly 15 years and had a great experience. It fulfilled all my expectations in terms of serving my country and just doing great work, keeping, trying to keep, the people of North Texas and Oklahoma safe.

Derrick Kyle: So, real quick. You joined DHS in 2007, if I understand correctly, DHS was still a fairly new agency at that point, right?

Rob Dunikoski: That's right. It was founded in 2003.

Derrick Kyle: Okay. Wow. And I remember so four years long growing pains, I'm guessing still working through those when you first started.

Rob Dunikoski: Oh, absolutely, absolutely. I think probably the biggest that jumps to mind was within the Agency I worked for. So, I was with U.S. Immigration and Customs Enforcement and then within U.S. Immigration and Customs Enforcement, you had two major components. And one of them was HSI, which we talk about today. And then another one was ERO. There was always a lot of tension in they called it the merger of those two organizations: one which covered immigration, the other which covered customs. And there's always a lot of tension there. And that still I think, was working itself out even throughout my entire time there.

Derrick Kyle: So, Immigrations and Customs Enforcement, commonly known as ICE. Is that what it was known as within the government as well?

Rob Dunikoski: Correct. That's right. ICE.

Derrick Kyle: Oh, so in, I we see ICE in the news a lot, typically on the immigration side, right?

Rob Dunikoski: Correct.

Derrick Kyle: So, a lot of the press is the immigration side, but it's Immigration and Customs Enforcement. And so, maybe lay people don't understand as much as people that deal with trade, that deal with imports. There's a whole other side that that's specifically customs enforcement that doesn't get the same national media play.

Rob Dunikoski: That's right. And it's actually half the agency. So, you have about 10,000. The agency, ICE, in total is about 20,000 people and you have about half of the agency is dedicated to the immigration mission and then half is dedicated, half is HSI. And so HSI has an incredibly broad portfolio of mostly federal criminal practice. So, we're talking about things like customs fraud, counter proliferation, human trafficking, child pornography. I mean all of these, it's actually 400 different statutes that ICE has authority over it. And a lot of HSI are criminal statutes that HSI is investigating those crimes. So yeah, it's an area and, it's interesting because to some extent, some of the baggage, I think that comes with the ICE moniker can kind of harm some of those efforts that HSI tries to do on the criminal side. So, the HSI agents are always kind of trying

to navigate that space of the immigration mission is very controversial. But their mission, HSI mission is not very controversial. It's bread and butter federal law enforcement that people of all political stripes can get behind. So yeah, it's an interesting, interesting dynamic within the agency.

Derrick Kyle: Right. So, okay, sorry for the detour there, but there's a few things I wanted to delve into.

Rob Dunikoski: No, that's okay.

Derrick Kyle: Okay. So, your role within DHS. So, you told us how you started you, you started in there, what was your role once you're at DHS?

Rob Dunikoski: Sure. So, my office was responsible for North Texas and Oklahoma. We basically covered the Eastern District of Texas, the Northern District of Texas, and then all the Federal Districts within Oklahoma. And probably the best way to think about it is we were general counsel for ICE, HSI, ERO, within that area of responsibility. So, we covered everything. I mean, we did employment law, we did privacy law, we did tort, we did criminal law, customs law, immigration law. All those different portfolios we had within our office. I think probably my favorite was advising the Special Agents within HIS. And they would come to us with day-to-day problems that a federal Special Agent is going to have. And we would help them out with those issues. And that was probably my favorite thing, I think, that we did. I also really enjoyed our employment portfolio, which that was actually very common to what companies, every company has employment issues, you have employees who may commit various forms of misconduct. The government has that too. So, we have our own, people think of internal affairs, we have that.

Derrick Kyle: Right.

Rob Dunikoski: And, yeah, I enjoyed that as well. So, it was a lot of I would say diversity of work.

Derrick Kyle: So, when you say you're like general counsel, I can definitely see that. Normal general counsel will often be dealing with the, the employment law side of things. Most general counsel are not dealing with international investigations or other sorts of criminal investigations that involve these agents, Special Agents that are you're specifically advising. So, I see the general counsel parallel, but then there's a very interesting, national security branch.

Rob Dunikoski: Oh, absolutely. Absolutely. That's what made it so interesting and just unique was you were having to navigate that space of federal Special Agents have unique authorities. They're very powerful authorities rooted in the constitution and then statutory and then regulatory. You're always trying to keep people grounded in a very noble mission, but a mission that had to always be governed by the rule of law. So, I was very honored to do that for that long. It was, I felt like I was really helping our agents achieve their mission but helping them do it in a way that kept our country rooted in the rule of law.

Derrick Kyle: And I don't want to spend too much time on Homeland Security Investigations, but it's such an interesting organization that, or agency that honestly people don't hear about as much as some of these other larger law enforcement agencies. And, just getting ready for the podcast I looked at where HSI agents or offices? I'm not exactly sure, but the location of these agents around the world and they're everywhere. I mean, it is like that's right. It is a very international practice. And I don't think even, I necessarily realized that, just the breath of agents that they have everywhere.

Rob Dunikoski: That's right. I mean, just to put numbers on it, the FBI, has around 10,000 special agents, HSI has around 7,000 special agents. And so, it's huge and it's everywhere around the globe. Part of it is the international. When you think about HSI probably the best way to think about it is, everything is probably going to have a border nexus in some regard. But because of that border nexus, there's constantly liaison work that has to happen abroad, there's coordination with foreign governments that has to happen abroad. So, it's really, it is an international footprint that HSI has. Just about every embassy and consulate's probably going to have an HSI representative stationed there to engage in all that work abroad.

Derrick Kyle: Very interesting stuff. Okay. So, you worked as a prosecutor, you worked as a litigator and advisor all for DHS. So, let's get more specific about, , some of the kinds of cases that you were involved in your role there.

Rob Dunikoski: Sure. That sounds great. I mean, I think one of the, in terms of the litigation side of things, we had various forms of federal litigation, oftentimes challenging agency authorities. Obviously, usually we're not the ones to go into federal court, that would be the U.S. attorney's office. However, there are times when we would get brought in as basically subject matter experts, essentially. A great example would be kind of in the, with a border search issue, which we can talk more about kind of the border search authority if you'd like, but basically, border search is a very unique authority.

Yeah, maybe now just I'll say a brief word on it. It basically goes back to the founding of the country. Since the time of the founding, the federal government has had the authority to search merchandise coming in and out of the country and to search for contraband. And the unique thing about the border search authority is that the federal government can do that with zero suspicion. So, in most Fourth Amendment context, you're going to need probable cause to do a search and a warrant. But in the border search authority, you don't need probable cause, you don't need a warrant. The search does have to be reasonable, because reasonableness is the touchstone of the Fourth Amendment and it's in the Fourth Amendment text protects against "unreasonable" search and seizures. So, the search has to be reasonable. But you don't need probable cause, you don't need a warrant. So, this is a very kind of unique authority.

And what would happen is that you would get a federal case involving this authority and the U.S. Attorney's office would reach out to our office and then we would be the ones to help bring that subject matter expertise to the table.

Derrick Kyle: Yeah. I, so I was just going to say, I mean, that takes me back to first/second year of law school, I'm sure, probably constitutional law. And that was a moment where when you realize that there's different rules at the border and of course you said starting at the founding at that point where you're thinking mostly, probably ships coming in from England. But now the border is a lot different context than it was then. So, the same rules don't apply necessarily crossing from Mexico or flying into the United States as you typically would expect as a citizen or as anyone when it comes to searches.

Rob Dunikoski: Yeah, that's right. I mean, people just say border crimes and people are always thinking about the international border with Mexico and it's like, well, no, the border is DFW airport, which is right down that way.

Derrick Kyle: Right.

Rob Dunikoski: And so, that's why we had a, such a sizeable presence here. That's why HSI has a sizeable presence across the country as, because the border is really effectively everywhere these days. And, yeah, it's an interesting, interesting thing. Yeah. So, but

Derrick Kyle: Yeah, so.

Rob Dunikoski: Yeah, we would.

Derrick Kyle: Go ahead.

Rob Dunikoski: And so, I was just going to say it was the type of job where the work was just a very diverse, I mean we would do everything from, another example would be like suspension and debarment. Which is a kind of a unique area of white-collar practice where a company can be barred for a period of time or suspended from a period of time from doing business with the federal government. When you think about this, that's a big deal because these federal contracts can be huge. So that can just be, if you, if you're a company that has built or has substantial federal contracts to lose that ability can be really difficult and harmful for the company. We'd get issues like that. We'd get the fourth amendment issues, which we were talking about. And then some of the routine employment issues that I would say, it was really a diverse practice. We'd also advise on sort of the immigration questions, a lot of immigration work. So yeah, it was a very diverse practice, very rewarding.

Derrick Kyle: So, when it comes to debarment, how that comes up in my world and our world, one of the ways is you can be barred from exporting. You can't, you can no longer have export privileges. And I know we will often counsel clients or even just at conferences and we're talking about it. And sometimes it's thrown in as the fines, penalties, possibly debarment, but what we always say is, well, if a company is an exporting company and they're barred from exporting, that could actually be the biggest deficit.

Rob Dunikoski: Absolutely.

Derrick Kyle: I mean, along with reputation.

Rob Dunikoski: Absolutely.

Derrick Kyle: Then so obviously there's debarment from government contracts, which is, like you said, huge for a lot of companies. And so, the debarment thing is not talked about honestly as much as it probably could be. And really the effects of that. Usually, the fines and penalties get the most press but whenever there's an enforcement action from import/export agencies and debarment is on the table, that that's often one of the worst punishments for a company.

Rob Dunikoski: Yeah. And you it's funny to mention that we would see that in the negotiations. So, typically speaking, the debarment issue when you're talking about a deferred prosecution agreement or a non-prosecution agreement or whatever you're doing on the white-collar side to resolve the matter, the debarment issue is oftentimes one where the government frankly, had a lot of leverage. And so that was always, that was always kind of one of those

hammers that got dropped. So I think you're, you're wise to counsel your clients to be considering that and to sort of factor that in early to the strategy of, Hey, not only do we have to think about cause yeah, the monetary penalty hurts, but frankly, for a lot of companies, it can be effectively a cost of doing business when you look at the revenue that the that's, a lot of these companies are making when you compare that to the fine they actually pay, oftentimes the real hammer is coming on the department side or on things like the monitorship, or some of the compliance programs they can put in place. That's a lot of times where the real, I think cost can, can hit for businesses and could really hurt them.

Derrick Kyle: That's a very interesting insight coming from inside the government, because you don't see, you don't see the debarments much, right. You, when we see that it's notable at least in the export side of this, for sure.

Rob Dunikoski: Yes, absolutely, absolutely.

Derrick Kyle: Getting more into insight from the inside, I guess I'll call it. Tell us a bit about the process for investigating federal crimes involving the border and the new context of what a border is. And what was your involvement within these investigations?

Rob Dunikoski: Yeah, that sounds great. I think probably the best way to go about that is to maybe just shed a little insight on the federal criminal process since people aren't really aware of how it works on the inside. Maybe if you just start with opening a case, like, how does a case start?

Derrick Kyle: Right.

Rob Dunikoski: Typically, there's different ways. A lot of times, especially like in the Customs context, a lot of times it's going to be a whistleblower. Something along these lines, there's going to be somebody who throws the flag, right? There's going to be somebody there who sees something that is illegal and they're bothered by it and they throw the flag. And there can be various incentives like *qui tam* and moiety, things like that incentivize people to throw the flag. But a case can often start that way. Sometimes it's a poison pen letter, , an anonymous letter to the consulate or anonymous letter to the FBI office of the HSI office.

Other times it can be a very common thing we see in the federal government is referrals from the state. So, we can often get a lot higher penalties in federal court, federal time is, is federal time, you're sentenced to 10 years, you're going to go to jail for 10 years. There's no getting out. There's no getting out early. So,

you get these referrals that come in and sometimes, a civil matter, you might have a civil customs fraud investigation that they're doing or maybe they're doing an audit or something along those lines. And they uncover criminal conduct. My favorite audit pattern, and this is something to your clients to be aware about is, you get audited once and you say, mea culpa, sorry and you promise to change. And then the government goes away. And then you just start, you revert to your illegal conduct or the conduct that's violating the statute. Then the government comes back for another audit. And guess what? They've just established knowledge because you knew, we told you, we issued a fine and then you just kept doing it. And that that's when you'll see a case often go criminal.

So, the first big goal of federal investigators is to build a case that the U.S. Attorney's office will accept. And maybe the reason I'm sort of going into all this is because when you think about it there's a lot that's going to happen. Before the U.S. Attorney's office is even involved. You're building a case, that means you are doing things like issuing accustomed summons, an administrative subpoena. You are doing surveillance, like old-fashioned surveillance. You are interviewing people. There's a lot of things, you're doing public records searches, all this kind of stuff, to get enough information to go to the U.S. Attorney's office and say, "Okay, this is what we have on our hands. We think this merits further investigation, and here's why." And they call that, I mean, that's kind of a pitch. If you will, for the U.S. Attorney's office, you're going to the U.S. Attorney's office, you're asking them to accept the case. But when you think about that, there's a lot that happened before you even got to that point. And so, where my office, I think, where we would add value, where we'd be involved is helping the agents navigate those waters. How do you correctly use a customs summons, you know?

Derrick Kyle: Yeah. Sorry there's, before we get to building the case, there are a few things I wrote down because I didn't want to forget, that are in line with what you were saying, these early stages. So, a couple of questions that I've always had. One: whistleblowers, in your experience when things were coming from a whistleblower, was that most often from inside the company, competitors, what was the typical pattern or was it really random? You couldn't really assign where it happened most from which quarter.

Rob Dunikoski: Yeah. I don't know that I don't have like great data on it. Okay. But my sort of anecdotal, my anecdotal experience was that it's usually somebody who's disenfranchised within the company for some reason. And that doesn't mean they have an axe to grind necessarily. It just means there's some tension there. And you know, many times just comes from I think, noble

principles of they see something wrong happening. They don't agree with it, and they nobly stand up and courageously want to say something. That's why, , Congress loves whistleblowers and that's why, because they they're doing the right thing. They're throwing the flag. And so, I think a lot of times that was, it was usually an insider, I mean an insider with some tension.

Derrick Kyle: Okay. And then another question I had from something you were saying. You said there was a lot of referrals from the state level. My question is similar, but oftentimes we wonder how much in the extent to which various federal executive agencies are communicating. So were there situations when HSI or DHS as a whole would get referrals from another federal agency? And if so, how much, how often did that happen? What did the coordination look like there?

Rob Dunikoski: Yeah, coordination is key within the federal government. Sometimes it's better than others. You get, I think even going back to 9/11 and the War on Terror, huge problems there with coordination between various the silos of information was talked about in the 9/11 Report and you see that within the agencies as well.

There's sort of a tension there is that sometimes they have their own information, and they don't share. But to answer your question: yeah, referrals absolutely are coming from CBP or from other sister agencies that need to get HSI involved. Because when you think about it, HSI, that's the second biggest, to the FBI, right? 7,000 agents, a lot of resources come with that. Forensics, we had a forensics lab, we have teams of auditors, we have all these different resources that smaller agencies maybe parts of the Commerce Department stuff just aren't as stacked up as much. And don't have some of those federal criminal authorities and resources HSI would have.

So, the minute sort of things start to look serious, yeah, other agency was going to absolutely loop us in. To give you an example of the border, right. Just devices at the border. One very common thing that would happen is that we would get a call or even just contraband the border. Like drug smuggling at the border. What happens is that on the ground, is that maybe baggage, if they find baggage at DFW airport, they take a drug dog on it, the drug dog alerts, that's CBP, that's doing that, right. But their first call is to HSI, cause HSI is the responding agency which comes out, kinda like the detectives is probably a good analogy. They're the detectives that come on that come on the crime scene and investigate. So yeah, that was another huge source of referrals.

Derrick Kyle: One more tag along question to that We deal a lot in our world with data from the Automated Commercial Environment, ACE. I was just wondering, and that's more CBP. That's definitely CBP, but as part of building an investigation, that's sort of data. I'm sure that's useful and does that come up often when dealing and building these cases?

Rob Dunikoski: Yeah, it's funny, the data side of it, I think, is new, right. And, I think, especially in the federal criminal space. I think that I would call that more kind of along the cutting edge of a federal criminal case. Most federal special agents at this point are operating in a world kind of like what you'd seen on TV, right? Undercover operations, surveillance, electronic surveillance, whether it's pen registers or wire taps, just traditional subpoena practice, getting documents, traditional interviewing practice and everything like that.

And so, in my experience, I didn't see as many situations where agents were taking data and trying to build sort of criminal, sort of establish criminal elements based on the data. But I can see how that would make sense, right? I mean, so the patterns are a great way to confront witnesses. I think that's probably more kind of the future as, than it is than it is kind of what's happening right now, at least on the federal criminal practice side of things.

Derrick Kyle: Right. Maybe at this point much more used on the civil, straight into Customs. They, they look at the data, they send a Custom Form 28, they ask for information, whereas it's more old school police work, it sounds like, on the federal criminal side, which takes us back to before the tangent, you were talking about building a case to pitch to the U.S. attorney's office

Rob Dunikoski: Sure. Before you do that, I want to sort of go back and highlight one thing. One area where data was absolutely used is in targeting, right? So, what you would see is the government would have kind of backend solutions operating that would feed out referral type leads to the field.

So, the old-fashioned kind of police work, I guess the best way to think about is you'd have sort of like automating target, systems that are sort of like analyzing a bunch of patterns of data. And then that data is referring like a lead out to an agent, like a human being who gets a lead and then investigates and that's kind where the old-fashioned kind of police work kicks.

Derrick Kyle: Okay, so, data still in the very early stages, it sounds like to determine who will be the targeted of this investigation.

Rob Dunikoski: Bingo, exactly. I think it's probably at least right now, that's probably the best place that it kind of fits into the criminal process. But yeah pitching the case was always mostly about resource allocation, honestly. The federal criminal practice is a very, federal prosecutive and investigative resources are scarce. So, you've got a lot of crime out there and you have very few special agents and very few U.S. Attorneys.

So anytime you would go into the U.S. Attorney's office, it would be, “Hey, how are, how do we get this case accepted?” You had to convince them that it was worth spending public scarce resources on pursuing the case further. And so, that's kind of what, the pitch would often involve that. Once that decision was made, so that the U.S. Attorney's office accepts the case, that was a big deal. I mean, if the case gets accepted, that means, you're moving forward, like full speed ahead. Now you've got an AUSA on board. Now you've got potential grand jury subpoenas. You're working towards a search warrant, ultimately, probably. And so, the case really starts, maybe wiretaps, things like that. That's where the case really starts to pick up traction.

Derrick Kyle: How often would, that sorry to jump in, but if it, when you pitch a case, how often are they picked up by, or like in your experience? I don't know if you can put like a firm percentage on it, but 50/50, more than that, less than that, when it was actually picked up by the U.S. Attorney office.

Rob Dunikoski: So, it's going to depend on the type of case. For sure. It's a good lawyer answer. It would depend on the type of case. I mean, when you're getting into very serious circumstances of drug smuggling and all that sort of stuff. International drug smuggling, well then it's going to get accepted. However, in a lot of areas like Customs fraud would be a great example. I would say it's very rare, you were going to get a Customs fraud case accepted, or another great example would be an intellectual property. There are various intellectual property crimes that are out there. IPR intellectual property rights cases, they call it, so Homeland Security has this, it's called the IPR center. It's sort of the nationwide leaving area in intellectual property crimes. But those types of cases, very hard to get those accepted. It just didn't have the spice of a bank robbery or drug trafficking or anything like that. And it could be very difficult to convince a federal prosecutor that it was worth spending government time pursuing it. So much, much more rare. I mean, I, hesitate to put a percentage on it, but very hard to get those accepted. And you had to kind of know that as an agent, and as an agency, going in, you had to say, “What are the types of cases the U.S. Attorney's office is looking for?” Then try to bring them those types of cases. So be kind of very practical and very realistic as far as what you present.

Derrick Kyle: So, the IPR, Customs fraud cases go being picked up for federal criminal prosecution. Sounds like a lot of that's going to be dependent on, there's going to be a substantial weight of evidence that you can already present to them and that would be the cases where maybe they will pick that up.

Rob Dunikoski: Yeah, even beyond the weight, cause that absolutely helps, like the weight that the evidence is a huge factor. But you're really, most of the time you're only going to the U.S. Attorney that when you have pretty good evidence that the crime is happening, you're not going to, it's not going to be half-baked. It's not going to be a fully developed criminal case, but you're going to have some pretty good evidence because otherwise you're not even going in there. But even where you had good evidence, you're looking at sort of just, I mean, honestly in a lot of things, dollar amounts. The U.S. Attorney obviously have guidelines as far as the amounts, things like that. Kind of, the way I always thought about in my head is, is this a big enough deal to where it is worth invoking the federal criminal machinery process, which on some level at the end of the day is all about deterrence. So, if we get a conviction in this case, if we're only able, if there's all this crime happening, we're only able to convict the tip of the iceberg. But then when we do get that tip of the iceberg, hopefully there's going to get some press on that, is that going to create deterrence? And so that's kind of oftentimes the lens that a federal prosecutor was going to be looking at was. The customs fraud example, a big one was, there's a Chinese aluminum importer out in California that ended up in like a \$1.83 billion fine, right.

Derrick Kyle: Wow.

Rob Dunikoski: That's a pretty big hit. And when you do something like that, that sends a message to importers and I would say that's oftentimes the lens that a federal prosecutor would be looking at, whether or not to accept the case would often be looking through that lens. Like, if I do this, is it going to help reduce crime kind of via the publicity that happens to some extent.

Derrick Kyle: Can you talk about that case just a little bit more, because I think maybe in some other forum I heard you talk about it a bit and if I remember correctly, it was, they were disguising the aluminum as pallets or something like that.

Rob Dunikoski: Yeah, that's right. It's been a bit since I've looked at the facts, but basically there's a thing called the aluminum extrusion which is basically, a finished aluminum product. So, think, when you go to Ikea there's those rails and things like that's finished aluminum extrusion. But you know, the U.S. has

put, huge duties on it. I mean, I think some of them are up to the 400% range. So, we're talking about a lot of very high cost to the importer to bring that stuff in. What this company was doing was they were basically disguising them as pallets. So, they were telling the government that these things were pallets. Very simple misrepresentation on the form, these are pallets, but they just cut their duty by 400%.

Derrick Kyle: Right.

Rob Dunikoski: And the next thing you know, they've deprived the government of \$2 billion dollars. So, yeah it was a very interesting case, but it's funny because like these Customs fraud cases, when you boil it down, you actually, when you drill down into the indictment, everything like that, it's usually like it's a box on a form that's checked wrong or it's a series of numbers on a form that's checked wrong. It's so fascinating. And that series of numbers, is a \$2 billion dollar difference. And so, if somebody's willing to lie, cheat, or steal that's a huge thing. But then obviously the company got that super hammered when they got caught.

Derrick Kyle: Well, there's the deterrent factor. Not only is it, an import from China, which there's a lot of that going on also, sounds like anti-dumping, countervailing duty situation with duty percentages that high or duty rate that high. And so that's killing multiple birds with one stone, as far as enforcement in the deterrent factor.

This concludes Part 1 of my conversation with Rob Dunikoski. Please join us next week for the second half of the conversation and the season finale of the Torres Talks Trade podcast. Thank you.