

Episode 15

Derrick Kyle: This episode is the second part of a two-part series covering my conversation with Rob Dunikoski, former Deputy Chief Counsel of the Department of Homeland Security and partner at Castandea + Heidelman LLP. In this episode we discuss custom summons, customs fraud investigations, and tips and recommendations for companies facing such investigations.

I know you mentioned customs summons and that's the administrative, you know, the typical administrative means in these customs cases, is it like a subpoena? What does a custom summons look like for our listeners?

Rob Dunikoski: Yeah, definitely. It's yeah, that's a great way to think about it, administrative subpoena. And so basically, it's just a mechanism it's statutory, I think it's like 15 0 9 19 USC, 1509 is the federal statutory authority. There's actually that statute provides an examination authority and then also at summons authority, they're kind of two different things.

But basically, that the summons authority, it's a little bit, more narrow than the examination authority. But basically for the listeners, it's just a way for the government to get documents administratively, you know, to send a company a subpoena, a summons, ask for the documents and then the company, and then the company has to produce them. And these things are used all the time. I mean, this is the way that the federal government can get that preliminary information that they need to go to the attorney's office to get them to accept the case to build the foundations of a search warrant. Because you have to remember, you know, we're talking about building the criminal case.

The search warrant doesn't happen until late in the game. I mean the search warrant is oftentimes, you've got some pretty good evidence. You need probable cause, which is a significant, you know, amount of information to get to the search warrant. So, but a lot of times the foundational stuff behind that search warrant is the summons. Which is all the more reason why, I mean, we would tell the agents, that's why you need to get the attorney involved because we can help them ensure they're using the summons correctly, because remember if you don't use the summons correctly and then that's the basis of your probable cause you're going to have problems when you get to the suppression stage down the road.

Derrick Kyle: And I think I'm glad we're delving into this a little bit more because I think this is a critical issue for listeners that are dealing with this on

the administrative side. I mentioned it before we deal with customs form 28, noted or request for information. We deal with customs form 29, notice of action. There's an administrative process that's going on there and at times there's still the opportunity to file a prior disclosure, you know, and then pay your duties, not worry about penalties. If you're getting a custom summons, it sounds like things are more serious or potentially going down a more serious path. And just like you were saying on the government side, getting the government lawyer involved early on. If there's a custom summons for a company, things are already sounds like they're pretty serious or heading down a pretty serious path.

Rob Dunikoski: So, like, yeah, I mean, absolutely. Especially they can come from different people. So, probably the first thing you're going to want to do is determine who's it coming from. If it's coming from CBP, Customs and Border Protection, that's one thing, if it's coming from HSI, that's a different source, different type of pain, right, as company. But I think your point is spot on. It is once you hit that summons level things just got more serious.

Derrick Kyle: And since we're talking about summons, we discussed this a bit offline, custom summons have been in the news more recently in the past few months in the way they were used. My understanding is these summons were used to gain all sorts of financial information. Can you talk a bit about what was going on there for our listeners.

Rob Dunikoski: Sure, yeah. Back in the spring, there was a New York times article on customs summons. So, for customs lawyers, this is a big deal, right? We we're often not on the page of the New York times, but there was a customs, there was an article about Homeland security using the summons. And in this situation, according to the article basically what was happening was that you had an HSI office in Arizona which was using the custom summons to get financial records of transactions between people in four states and money going to Mexico. And the concern, there was customer congressional concern and the concern was that they had effectively turned this into a form of surveillance, of surveillance of financial transactions.

Derrick Kyle: Yeah.

Rob Dunikoski: And so, what they were doing was they were using a series of, you know, again, according to the article and according to the congressional letter, what they were doing was using a series of summonses to obtain millions of records. And then these records were actually going to a non-governmental organization or information clearing house being compiled and then law

enforcement could access them that way. So, there was lots of concerns about that. I think, you know, I don't know the details didn't work on that. But in my mind, at least being a former government lawyer, it's precisely why you would want to have counsel involved, at that stage be because, you know, there are limits, when you, when you go to the summon statute there's statutory text that Congress has said that has to be followed when you issue these things. And you're really going to want to lawyer's mind on that. So very interesting. I think it's, you know, the other thing that I always think about is that, you know, if these authorities, if they're abused, they'll be taken away. That's my kind of earlier point about the rule of law, right? It's that law enforcement is awesome, and it has a noble mission, but they have to be very careful to use the authorities consistent with what Congress has said that the way they should be used. And if not, you know, like in this case, there's a congressman that wrote a pretty scathing letter about it. If not that's trouble, right? You don't want to and oftentimes the authorities are used for great good, right. You're doing lots of great work with these authorities. So, what you don't want to do is poison the well and use it in a kind of way that's incorrect and the next thing, you know, you lose this powerful authority. That's devastating for the law enforcement community.

Derrick Kyle: Absolutely. I think that's a great point. I did want to delve into that a bit because I found it very interesting when we were talking about it the other day. So, moving on, I know we covered a bit earlier but I want to return to the customs fraud example and customs fraud prosecution. So, within a customs fraud prosecution, what agencies are typically going to be involved?

Rob Dunikoski: Yeah, so there's the two main ones are CBP Customs and Border Protection and then HSI Homeland Security Investigations. I think probably most of the listeners know this, but the CBP is, you know, there's two parts of CBP. I'll give a little bit of background. You have actually, it's interesting, it's kind of parallel to the ICE thing. You have two parts of CBP, you have OBP or the Office of Border Patrol. They're the guys and gals in green, down on the border running around doing everything down there that that's part of CBP. Then you have OFO or the Office of Field Operations, different part of CBP where the public most commonly sees that part of CBP is at the airport. When you're flying back from London, and you present your passport that's an OFO officer. If you look at their uniform, it'll say Office of Field Operations or OFO, they actually have two kind of missions, even there at the airport. They have the immigration side, right? The passport thing, you're getting stamped there. But then you're also, every time you fly back from abroad, you're filling out the customs declaration.

Derrick Kyle: Right.

Rob Dunikoski: And so, a little joke about the custom declaration. There, a question on there about bringing in food and I always say everybody kind of lies about on the custom declaration because they always check no, but it's like, if you have chocolate in your bag, how is that not food? You know? So I'm the one, I'm the one guy that checks, yes and that gets referred to secondary. And they're like.

Derrick Kyle: You are not the one guy because you are speaking to the other guy.

Rob Dunikoski: Okay, that's awesome.

My wife, when we go on trips and we're coming back, even as recently, as a few months ago, I was checking souvenirs, you know, and I was doing the exact amount and no one ever really deals with that, but I'm like, well, I don't want to get stopped for this. I'm a customs attorney, I'm a trade attorney. Like this is not, I don't want this publicity. Not that it'd be publicity, but I, you're not the one guy that fills out that form very clearly and specifically. Yeah. So secondary

Rob Dunikoski: Yeah, so secondary people might not know, secondary is like secondary level of inspection. So primary would be when you first walk up, right. So, for, you know, you're getting a passport stamp, that kind of stuff, secondary would be getting referred to a second level of inspection. So, it's just kind of a more intensive inspection. So, but it's always a very funny conversation because, you know, sometimes they'll send you over there and then you talk and they're like why are you here? It's like, cause I have chocolate and the form says and it said food.

But yeah. so yeah, you know, OFO is field operations and what happens is that, you know, and this type of thing, they're doing inspections at the airport. So, it's not just me coming in with my chocolate, its importers bringing in pallets of stuff. And so, you know, oftentimes their initial role is more on the administrative side, trying to ensure that the, you know, that all the duties and tariffs are correctly enforced. But then what happens sometimes is maybe it's, you know, kind of an example they told you before, maybe they've got somebody that they've dealt with. They've, you know, maybe fined them before and now they're finding more violations, you know, they start to see patterns of criminality and that's when HSI gets involved. So, again, back to the thing about the detectives, you know, that's when the special agents come in, that's when

they start digging and that's when they start getting involved in a custom's corrupt fraud case.

Derrick Kyle: Okay. So, those are the agencies, what's at stake in a customs fraud case for the parties involved?

Rob Dunikoski: Yeah, so, I mean, the big thing is you've got, you know, the first thing everybody thinks about is jail time, right? Customs fraud is more in the white-collar vein. So, I mean the jail, the sentences while significant are going to not going to be in sort of the area of the drug traffickers and the bank robbers and things like that. That's part of the reason going back to the whether or not the case gets accepted. That's part of the reason why it's less maybe appealing to a federal prosecutor, right? If you can get 15 years on a bank robbery, that that feels like a great win. But if you only get 18 months or, you know, something like that on a white-collar sentence, that's, you know, maybe feels a little bit less like a win. So that that's part of it is just the jail time.

But I would say for an individual, you know, 18 months in the federal bureau of prisons is 18 months in the federal bureau of prison.

Derrick Kyle: Right, right.

Rob Dunikoski: Significant deterrent there. You have the monetary sides; you've got the penalties that are going to go on. That can be both that can, you know, oftentimes of the form of restitution, but then asset forfeiture as well, that the customs fraud statutes are going to be SUA or specified unlawful activity for purposes of the money laundering and then the asset forfeiture provisions. And so, you can run into situations where, you know, asset forfeiture is in play, that could be a huge hammer. Things like, you know, your point earlier about kind of the compliance and the monitorships and everything like that. And the deterrent, that's actually oftentimes a very important aspect for the agency, that is investigating because at the end of the day, the agency's main goal more than it is to kind, I mean, yeah, you want to send somebody to jail, but why do you want to send somebody to jail? Well, because there's justice issues, but there's also deterrence issues. Same thing with the fines, right? There's sort of this, there's a justice element. There's a deterrent element there, but you also want to stop the conduct, you know, you want to stop bad things from happening on lawful things from happening. And that's where things like the monitorship and the compliance programs, everything like that, get put that's where those are very important to the, you know, I remember when you were dealing with the executives within the higher levels of the agency, oftentimes that was their biggest concern. It was okay, what's the compliance program going to look like?

Cause we don't just want to hit this, you know, company one time. We want them to stop this conduct, we want this to cease and desist. And so, it's the monitorships and that's where that can often be significant.

So yeah, those things are in play. We talked about the suspension in the environment that can be in play and that's huge. I think those are the main kind of main big hammers that they hit a company.

Derrick Kyle: So just, a plug for a previous podcast, ZTE case, although that's, on the enforcement side, we recently a few episodes went into broke down more on the ZTE case, how it started and what happened there. So just a small plug there. It's interesting because that is one of the largest or best examples of a monitorship being put in place by the federal government. Though that is the export side sanctions law side of things. And justice, Department of Justice was involved as well.

Rob Dunikoski: Exactly, exactly.

Derrick Kyle: Okay. So, the that's what's at stake. If we could talk a bit more, a little more in the weeds, we don't like to get two in the weeds, but for people to understand we say customs fraud, prosecution, but what are the authorities? How does the government bring these cases and conduct these investigations?

Rob Dunikoski: Sure, thanks. So, you have, basically, I guess you have to divide it out into the two main areas, which should be the civil authorities and the criminal authorities. And so those things are oftentimes, you know, something called parallel investigations that happens, right. So oftentimes those things are kind of running in tandem. However, if the criminal side is in play it'll often be a dynamic where the civil side might sit while the criminal side plays itself out. Not always like at a dead standstill.

Derrick Kyle: Right.

Rob Dunikoski: But oftentimes the government's going to want to kind of see the criminal side through because that's the biggest hammer. But as you start to converge towards a resolution, that's where you'll often see these agreements with the U.S. attorney's office, where you know, both the civil and the criminal matter will be resolved at one point in time collectively. So, while the civil side can get slowed down, it would be an error to say that that stops completely.

And, you know, the criminal takes precedence. It's like, no, the two are happening in tandem. So, you know, it's important to be aware that there there's

multiple, you know, multiple authorities. Several of the statutes are actually in the 18 USC title, which is, you know, it's kind of interesting. Historically we've talked about this in the past and you know, other forums, but historically it's super fascinating that the customs laws are, you know, some of the earliest on the books. I mean, you go back to the first Congress and some of, and actually even more interesting, like the first Congress and then some of the first things that the first Congress did was in the area of customs. That's kind of a history thing where it's like, this was how the government was funding itself back in the day. But these criminal authorities were there, like they're on the books, like right away. And it's things like, you know, it's things like false statements. You know, it it's, there's specific authorities dealing with customs false statements to customs. The government is always going to be concerned with having reliable and accurate information. So false statements is going to be a key part of any case with the government. And so, like it's 18 USC 542.

Derrick Kyle: That's often where things can turn criminal or at least that's where the easiest way for them to go criminal. It seems is these false statements even before there's real proof there. It's easier to prove a false statement than maybe the underlying crime that's trying to be proved by the government.

Rob Dunikoski: That's right. You know, I think it's something that everybody get their hat around. Some of the import, exports, the duties, that's all very technical and complicated. And remember at the end of the day, you're talking about presenting a case to the jury, right. But a false statement I think, is something that anybody can get their hat around. You told me this and it wasn't true. And I think that might be, you know, kind of why it's kind of at the core of a lot of customs fraud, prosecutions, right. And then you have smuggling as well. 18 C 5 45 is sort of the basic smuggling statute, which is used by customs.

So you have all kinds of, you know, criminal authorities, but it's also important to know you have kind of parallel, civil authorities that get used. And in there on the civil side, you've got entirely different, you know, processes that happened. You've got the 1592 process that happens. You've got the false claims act process. You've got different, you know, civil tracks, if you will, that go down and that can be in play as well. And so, I think it's just a really good example of frankly just a very complicated type of law enforcement, right?

Criminal authorities, civil authorities, a lot of complications, a lot of layers to it, you know, all the more reason for people to have good customs lawyers like yourself, right.

Derrick Kyle: Thank you. And, and I think that's the takeaway is look at all of these different ways that the government can get you. Whether on the civil side or the criminal side, and even bring it up again, the false statements, which is, you know, it's not a customs issue, but a customs issue can create the situation where you're on the hook for a false statement to the government. I think that's really the takeaway is you just listed four or five different statutes, both criminal and civil that people have to be aware of when they're in this space. And we see this a lot. A lot of times customs brokers are involved and the importers themselves are not really taking ownership of what's happening and that's really an issue because you have to know what's going on with your operations because these laws will apply to the importer.

Rob Dunikoski: No, I think that's spot on. And I think part of my insight I think is too, is that in the world of business there's isn't even a whole concept puffery, right? Remember like corporate law, we talk about puffery, right? There's a whole concept, that doesn't work with the government. Like there is no, like it's just a different standard. It's like this brutally honest, like when you check that box, like brutal honesty is the standard, right. That's what you need to be with the government, like puffery doesn't work,

Derrick Kyle: No, I've actually said that. I don't know if I used the term puffery, but we have to caution clients about marketing information, and this is both on the import and the export side. But you may be saying something and it is puffery, you're right to use the legal term about what this product is or can do on the export side that gets into classification. If you say it's ruggedized, you know, immediately there there's a connotation that maybe this is useful for military, but if your idea of rugged eyes just means, well, we use harder plastic than this normal type, it it's not necessarily ruggedized. So, that's on the export side, same thing on the import side, because so much is about the tariff classification of these products coming in. And if you're basing it on your marketing information and your marketing information isn't exactly right, well, the tariff classification system is so technical that you could be in an entirely different classification code. Which could have different duties, which could be subject to 301 tariffs on China. So, but I think that's a great point about puffery and just brutal honesty when it comes to dealing with the government, responding to the government filing paperwork with the government, you mentioned 1592, and that's, that's all about entry documents and what's represented on those. So, point well taken.

Rob Dunikoski: Right, no absolutely. And then, you know, it's also worth bearing in mind, there's a cultural aspects too, right? I mean, you've got, especially when you're dealing with international people from, you know,

international other countries don't necessarily have the same, their governments don't necessarily have the same standards of honesty and candor that the United States government has. So, the United States government's, it is a brutal sort of honesty standard. So oftentimes when you're dealing with people from abroad, they may be dealing with a country that has a very different standard of how you interact with the government. It's like this is very common for us to make these sort of like, you know, false statements to the government. It's like, oh yeah, yeah, not here. Not in the U.S. government, you know, it's, that's the sort of stuff that we'll get people sent to jail here.

Derrick Kyle: And we're not going to go down that tangent, but that brings up a whole other area of FCPA and Foreign Corrupt Practices Act. And why that's in place also imports from China and some of the things that happen by Chinese companies in order to get to export their products from China, some of the things that they say or put in documentation that we've seen. There's a whole Pandora's box there. Maybe another podcast in the future, because that's really an interesting point about cultural norms and government expectations for foreign countries. I mean, that's very interesting conversation there. I am going to move us on to, to our next question here, but I really like that point, that's well taken.

Rob Dunikoski: Yeah, thank you.

Derrick Kyle: So, okay. So, in your back to your personal experience do you have any horror stories, war stories, as far as craziest or worst case that you dealt with in the extent that you can share the story?

Rob Dunikoski: Yeah, it's obviously limited in how much I can share, but I think my I think some of my favorite situations where when I was dealing with real time law enforcement decision making. I think that's where, you know, a great example would be search warrants. So, you know, a lot of times, we would get a call that there was going to be a search warrant executed and depending on the complexity, we would be on a call for it and we would deal with it. I remember dealing one time where, we had, we raided a, we went to a business we executed a criminal search warrant on a business. And essentially that means we, we shut down the business. So, we show up, we execute the warrant, we seized all the, you know, documents and, you know, computers and things like that. Kind of a big deal, but in the middle of this, the attorney for the company showed up, you know.

Derrick Kyle: Was this inside council or outside council, if you recall?

Rob Dunikoski: It was outside counsel.

Derrick Kyle: Okay.

Rob Dunikoski: Yeah. Outside counsel shows up and wants to be on the scene. And, so the decision for that I had to make was whether or not to let you know, they consulted, I guess they didn't make a decision.

They consulted me, I advised on it and then they made the decision. Was whether or not to let the council on the premises and I bring this up because this was recently in the news with the raid on Mar-A-Lago, right. It was reported that they didn't let council on the premises. My decision differed in terms of my advice differed, I said to let 'em on escorted the whole time. And the reason I did that was because I think you, you want to frame everything in terms of reasonableness because when a judge at the end of the day is looking at, you get to the motion to suppress, you get to the stage of suppression, did you operate in a reasonable way? So, it's kind of interesting, it was like, I love those situations. It was great. Cause it was like, it was, you know, you were forced to make, that's kind of a complicated thing and reasonable, mind's different. They obviously different with Mar-A-Lago and their judgment and circumstances there. But how fun is an attorney, right. How great to be kind of, yeah. I mean, just really kind of drawing upon your experience and your knowledge and everything, and just making these really heavy difficult decisions in real time. So, yeah, it was, that was probably the best part about working for law enforcement.

Derrick Kyle: That's yes, it's a law enforcement job and that was a, it's a very interesting crossroads between, you know, constitutional law really. And the ongoing law enforcement action.

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

Derrick Kyle: So, from your perspective with your unique experience and insight from being within a department of Homeland security, I'm going to ask you a few questions and, and what would generally be your advice for company's? Best advice first for a company just generally involved in the world of imports or trade?

Rob Dunikoski: Yeah. I mean, I think we we've hit it pretty hard already, but it's really this concept of honesty. I think that you have to go back to the beginning of the country and realize it from the beginning, the government has wanted valid information regarding what gets imported. That's been a criminal

statute since, you know, 1789 and it is still the statute that is the focus when it comes to customs for federal law enforcement. So, I think my advice for a company would be, you know, look you just got to know that you've got to know in dealing with the government that truth is important in this documentation.

Derrick Kyle: Right. Very good stuff there.

Rob Dunikoski: Yeah. I think also, oh, I was just going to also say. I think also therein lies the importance of things like compliance programs and monitoring programs and internal programs to be the checks and balances within a company because you, you know, human nature being what it is, you can't just rely upon everybody to do the right thing all the time, right. You've got to have internal processes and procedures in place to serve as the checks and balances to make sure that that yes, honest information, you know. Things like auditing, functions, everything like that as a company you've got to have that in place. I think that sort of, why do I have to have that in place? While framing it through the, you know, the big picture lens of the way the government is going to look at you, if they come in on you, I think it is important and helpful, right.

Derrick Kyle: And we don't see that as much as we would like typically there's not as many and there, let me be careful here. There are absolutely, plenty of plenty of companies, plenty of importers that have very good compliance programs that they have a culture of compliance, and they have their import manual. They have a, a great auditing function and they do it because of that culture. But oftentimes we're not seeing clients come in to preemptively get within compliance or become compliant with customs regulations and statutes. Which leads to my next question. advice for a company that think they may have violations haven't necessarily been contacted by the government, but they think they may have violations either administrative civil violations or potentially criminal violations. What, before the government contact, what's the best advice for one of those companies?

Rob Dunikoski: Yeah. I mean, I think you have to know what you have on your hands, right? So how are you going to do that? How are you going to find out what you have on your hands? Part of, it probably depends on the scale and the scope of the problem. But this is where things like an internal investigation may be a useful mechanism. Whether you do that internally, having somebody within your company conduct the investigation or externally hiring an outside you know, firm or an investigative agency to do the external investigation. You're going to want you know, the hallmarks of an investigation or sort of independence, thoroughness, and objectivity. And so you're going to want to

make sure that whatever you do can touch those bases. You know, the independence who's running the investigation, are they really independent? Like is the boss controlling them? You know, the person that might be committing customs fraud is that the person they report to? That's a problem, right. You know, if you look at their skills and their ability to be objective and everything like that. I would counsel, if I was in a, if it's a serious situation, you think you might have something serious on your hands. I would counsel having a lawyer conduct the investigation. People always like, well, why do I need a lawyer? I think that a couple reasons jump to mind. One is attention to detail. I think, you know, this, I mean, we're the ones that check the box on the custom declaration, right. For chocolate.

Derrick Kyle: Yeah. Right, right.

Rob Dunikoski: Yes, it's kind of thing you want. It's it is sort of the understanding of the law. Obviously, that goes without question. A huge thing, investigations is judgment. It's something that people don't think about, but a huge thing is judgment. There are a lot of steps within an investigation, which are judgment calls. You know, the law is often we can tell you what the law is, but then you get to this range of judgment. And during investigation, you're making judgment calls. Is somebody credible, right? All these different things that are judgment calls. Who do I investigate first? How do I go about the investigation? You know, does this get disclosed back to the prior disclosure thing, all these things are judgment calls, right?

You're going to want somebody with good judgment attorneys that's our that's part of our stock and trade, right? We're trusted because we're counselors, we're advisors, we can bring that to the table. And then a huge one for people is also the attorney client privilege. You get when you have an attorney, the communications with the attorney will be privileged. And that's oftentimes a huge benefit for a company because they, they control the privilege. They get to decide whether they want to waive the privilege, whether they want to go forward with the information or not. But they have that as well. So yeah, I think that's huge. You got to figure out what you have in your hands, but, but more importantly, you got to figure, think about the process for how are you going to figure out what you have on your hands, pay attention to that process, the process of the investigations be very important.

Derrick Kyle: Great stuff leading to the last question, which brings it back to your past experience though often this is really worst-case scenario, but I think we should address it because companies find themselves in this position quite often. Advice for a company that has now been approached by Homeland

security or HSI or another agency approached by the government. What's the advice for, for those companies.

Rob Dunikoski: Yeah, I think the best thing I can say is that pick up the phone in the moment. I mean, you just don't rush in you, if you get a call from I mean, this goes for any part of the federal government, but, HSI is just one example. If you get a call, I think that's where you pick up the phone and you find counsel to help you out because it's just a situation where there may be a temptation to rush into those conversations. So to have a quick conversation and I think oftentimes the idea is that get them to go away, right? Like I just talk to them, get them to go away. But remember that back to the false statements thing you know, 18 USC 1001 as a federal prosecutor's best friend and a false statement to the government is a criminal offense, in certain circumstances. And you've just got to be very careful about walking into that trap where next thing you know, they've got huge leverage on you because you made a false statement during that initial interview. Once you hire a council, you've just back to brutal honesty. You've got to be brutally honest with counsel. You've got to tell them the facts they have to know. Cause the only way your council can help you is if they know everything. And so anybody who's done any sort of criminal, you know, defense work knows that the client's going to, you know, usually you're not getting the full truth, you know, right away.

But a client, corporate clients well served by just giving the information to the attorney, let know that that information's going to be privileged. It's going to be protected. The attorney can't disclose it and that's how they can most effectively advise you.

Derrick Kyle: Excellent, great stuff. Well, Rob, thank you so much for joining us today. This has been valuable, unique insight, from you, someone who's worked many years inside an agency, that many of our listeners deal with on a regular basis, not necessarily HSI, but a branch of DHS. Any final thoughts, for us today?

Rob Dunikoski: No, just thank you. This was fantastic, I really enjoyed chatting with you. It was a pleasure. Same

Derrick Kyle: Same likewise. This episode concludes the inaugural season of the Torres Talks Trade Podcast. We hoped you enjoyed it and found it informative. Feel free to contact us to share ideas for next season. Stay tuned for more coming soon.