

**SELECT COMMITTEE ON  
INTELLIGENCE**

**UNITED STATES SENATE**



**Additional Pre-Hearing Questions for  
Ms. Shannon Corless upon her nomination to be Assistant Secretary for Intelligence  
and Analysis, Department of the Treasury**

1. Please describe how, if confirmed as the Assistant Secretary of the Treasury for Intelligence and Analysis, you will be responsive to the Director of National Intelligence (DNI) and the Secretary of the Treasury.
  - If confirmed for this position, I will ensure that OIA continues to provide the most timely, accurate, and nuanced intelligence information possible to the Secretary. I will also ensure that OIA continues to effectively support DNI Haines and the broader intelligence community (IC) she leads.
2. If conflicts arise between the priorities of the DNI and the Secretary of the Treasury, how will you act to resolve them?
  - I am unaware of any conflicts between the DNI's priorities and those of the Secretary. If confirmed, I will coordinate effectively with the Secretary and the DNI and work diligently to resolve any such conflicts consistent with Administration priorities.
3. Please explain your understanding of OIA's responsibilities and authorities within the IC for coordinating, facilitating, or otherwise improving financial intelligence collection and analysis. Do you see OIA as the IC's lead agency on financial intelligence issues?
  - Treasury has a long history of enhancing U.S. national security, and OIA's mission is critical to Treasury's work. This role has evolved over time, along with Treasury's mission. OIA, as an intelligence community component within Treasury, works on the cutting edge of global financial intelligence. OIA was established in 2003 as part of the reorganization of our intelligence and defense agencies following the terrorist attacks of 9/11. I understand OIA frequently produces intelligence products for the President and Cabinet-level officials, as well as Treasury policymakers and fellow IC components. Over the years, economic sanctions and financial diplomacy have increasingly become tools of choice for policymakers. If confirmed, I will support OIA as it continues to build on its strong financial intelligence knowledge base and analytic expertise to provide critical support to the use of those important tools.

4. Do you intend to comply with the president's executive order on ethics? Will you promptly notify the committee if any waivers are granted?
  - In connection with the nomination process, I have consulted with the Office of Government Ethics and the Department of the Treasury's Designated Agency Ethics Official to identify potential conflicts of interest. Any such potential conflicts will be resolved in accordance with the terms of the ethics agreement that I have entered with the Department, which has been provided to this Committee.
  - I intend to comply with the President's Executive order on ethics. If there is a need for a waiver, I will make the Committee aware.
5. Please describe your current understanding of OIA's participation in the CFIUS process. Do you think OIA is well positioned to support the interagency in the CFIUS process? How do you see OIA evolving to better support the CFIUS process?
  - It is my understanding that serving as the CFIUS chair is one of Treasury's most critical national security responsibilities. I have spent the majority of my career at ODNI leading the IC's support to the CFIUS process. If confirmed, I will work with OIA, TFI and the Office of the Undersecretary for International Affairs to look at OIA's contributions to the CFIUS process.
6. Please explain your understanding of how the oversight roles of the Senate Select Committee on Intelligence and the House Permanent Select Committee on Intelligence differ from the oversight roles of other congressional committees that have oversight jurisdiction for other offices within the Office of Terrorism and Financial Intelligence and the Treasury Department.
  - The Senate Select Committee on Intelligence and the House Permanent Select Committee on Intelligence share oversight responsibility of executive branch intelligence activities. As OIA is an intelligence community component housed within the Department of the Treasury, a non-intelligence community agency, these important committees provide a critical intelligence oversight role for intelligence activities and authorities specific

to OIA. If confirmed, I will ensure OIA works effectively within TFI and Treasury to facilitate Congress' important oversight responsibilities.

7. OIA is the only component within the broader Treasury Department that is designated as an Intelligence Community element under the National Security Act of 1947. With that comes challenges in coordination and information sharing both within the Treasury Department as a whole, and with the broader Intelligence Community.
  - a. If confirmed, how would you protect IC-related information within the Treasury Department, while at the same time working with the IC and the congressional intelligence committees to ensure that we can accomplish our oversight obligations?
    - If confirmed, I will ensure that OIA continues to work closely with other Treasury offices and bureaus to ensure that only Treasury employees with the appropriate security clearances and assigned mission need have access to intelligence information, consistent with the need to protect intelligence sources, methods, and activities.
    - I recognize that Congress plays an important oversight role regarding executive branch activities, and I pledge to thoughtfully consider all congressional information requests, recognizing the importance of transparency in government. If confirmed, I pledge to work through the accommodations process to comply with Congressional requests for information to the fullest extent consistent with the constitutional and statutory obligations of the executive branch.
  - b. If confirmed, how will you ensure that OIA's intelligence information is protected from information requests directed to the Treasury Department writ large?
    - I understand that OIA has senior disclosure officers who are experienced in protecting national security and safeguarding classified information consistent with Treasury's disclosure obligations. If confirmed, I will exercise appropriate oversight of this critical responsibility, and ensure OIA continues to work closely with the Treasury Legal Division. If confirmed, I will ensure that careful consideration continues to be given to any request seeking downgrade

or disclosure of any intelligence information, including delisting actions, litigation, or OIA's intelligence information.

8. In 2020, the DNI established the role of Economic Security and Financial Intelligence Executive (EFX) and appointed you to that role. Given EFX's roles and responsibilities, what does Treasury OIA contribute to the financial intelligence and economic security mission? How has Treasury OIA's role changed in recent years, given the increasing importance of that mission?
  - The role of the EFX is to align and integrate the IC's collection and analytic capabilities against the nation's most important strategic issues related to economic security and financial intelligence. I understand OIA's contribution to the IC's financial intelligence and economic security mission, its alignment with IC priorities, and its emphasis on providing timely, relevant, and accurate intelligence and analysis to the Secretary.
  - As economic sanctions and financial diplomacy have increasingly become a tool of choice for policymakers, the need for timely, accurate, economic-focused intelligence makes OIA indispensable to the Department's mission and an asset to the IC. In addition to meeting the daily intelligence needs of the Office of Foreign Assets Control (OFAC), the Financial Crimes Enforcement Network (FinCEN), the Office of Terrorist Financing and Financial Crimes (TFFC), Treasury's Office of International Affairs, and Office of Cybersecurity and Critical Infrastructure Protection (OCCIP), OIA serves as a liaison between the IC and these Treasury policy offices, to ensure that Treasury policy offices are staffed with the timeliest intelligence and that the nation's economic policy considerations are factored into IC collection efforts.
9. What legal authorities does OIA primarily rely upon to identify, disrupt, and dismantle terrorist financing? Do you believe there are additional legal tools that OIA needs for its efforts against terrorist financing?
  - It is my understanding that OIA carries out its intelligence mission of identifying, tracking, and enabling the disruption of threats to the U.S. financial system -- whether from geopolitical actors, terrorist groups, or foreign-based criminals -- under authorities provided by Executive Order 12333 and sections 311 and 312 of title 31 of the U.S. Code.

- If confirmed, I will examine OIA's tools and authorities to combat terrorist financing and will work to ensure that OIA staff continue to be fully equipped to deal with this and other critical national security issues.

**10.** What terrorist organizations are of most concern to OIA? Please describe how, if confirmed, you would proceed to identify, disrupt, and dismantle the financial networks of these organizations?

- The United States currently faces dynamic and constantly evolving terrorist threats from groups that seek to target the homeland and U.S. diplomatic and financial interests abroad. While groups such as al-Qa'ida and ISIS continue to demonstrate both the aspirations and capacity to target U.S. interests, there are emerging groups – particularly religiously and ethnically motivated violent extremists (REMVE) – that also pose a threat to our financial system and values.
- If confirmed, I will work to ensure that OIA's unique expertise and tools continue to be an important part of TFI's critical work of safeguarding the U.S. financial system from abuse and bringing malign actors that threaten the national security of the United States to account for their activities. I will also work to ensure that OIA plays a leading role in the IC's efforts in these areas as well.

**11.** If confirmed, how would you proceed to identify, disrupt, and dismantle the charities that raise money for terrorist organizations?

- A critical component of OIA's mission is to identify not just threats to the U.S. financial sector but also vulnerabilities in the global financial system that terrorist groups exploit to raise and move funds. Despite significant progress over the last two decades, the charitable sector in some countries remains vulnerable to abuse.
- If confirmed, I will support and work closely with relevant senior officials to address this critical issue.

**12.**What issues related to strategic competition are of more concern to OIA? Please describe, if confirmed, how you would seek to ensure OIA is able to meet the financial intelligence mission in light of strategic competition.

- If confirmed, I will work with OIA, TFI and Treasury senior leadership more broadly to review issues and priorities related to strategic competition.
- I understand that OIA recently stood up a Cyber Directorate to leverage its cyber analytic, technical, and collection resources to enrich intelligence on state-supported cyber threats against the U.S. financial sector, as well as on the financial networks that enable malicious cyber activities.

**13.**What are the challenges that OIA faces regarding digital assets, such as digital and crypto currencies, mobile payment platforms, and other electronic payment forms? If confirmed, how would you address those challenges?

- Malign actors cannot be permitted to utilize cryptocurrency, digital assets, and other electronic payment forms as a means to evade sanctions, finance terrorism, or violate U.S. law. If confirmed, I will examine OIA's tools and authorities to gather information related to such illicit activity and ensure that OIA staff are fully equipped to provide timely, relevant, and accurate intelligence and analysis on the use of digital assets to evade sanctions, finance terrorism, or otherwise undermine the integrity of the U.S. financial system.

**14.**It is critical that OIA have a workforce that is positioned to address the challenges posed by digital currencies and associated infrastructure, financing on the dark web, and other, new threats. How should OIA work to train and recruit a workforce capable of carrying out OIA's financial intelligence mission?

- It is my understanding OIA is fortunate to have many talented and experienced technical experts on cyber and financial issues. If confirmed, I will ensure that OIA continues retention efforts that align with broader Treasury and IC retention efforts and continues to work with Treasury's human resources personnel to take the steps necessary to effectively recruit additional candidates who have those essential skills and qualifications.

- If confirmed, I will undertake a review of OIA's training to determine if modifications to the training program are warranted. In addition, I am aware that OIA provides an Illicit Finance Course to the larger Intelligence Community.

**15.** How does OIA confront and mitigate insider threat challenges? Do you have any plans to revisit and readdress those programs?

- I understand that Treasury's Insider Threat Program meets the national-level standards established by the National Insider Threat Task Force under Executive Order 13587. If confirmed, I will assess the maturity of the program, its framework, and its operations to ensure compliance, efficacy, and efficiency.

**16.** Unlike other elements of the Intelligence Community, Treasury's Office of Intelligence and Analysis has not finalized Attorney General approved EO 12333 procedures. DNI Haines, ODNI General Counsel Fonzone, and Assistant Attorney General nominee Olsen have all committed to prioritizing the completion and public dissemination of those procedures. Do you make the same commitment?

- Yes, I am committed to prioritizing the completion of Treasury's Executive Order 12333 procedures and their public release following the Attorney General's approval.

**17.** Do you believe that the People's Republic of China (PRC) is engaging in a zero-sum game of economic and technological competition against the United States?

- As Deputy Secretary Adeyemo has noted, competition with China and Chinese statecraft is one of the central challenges that the United States and its allies and partners face in the 21st century. According to the DNI's 2021 Annual Threat Assessment of the U.S. Intelligence Community, these challenges include China's whole-of-government efforts to spread China's influence, undercut that of the United States, drive wedges between Washington and its allies and partners, and foster new international norms that favor the authoritarian Chinese system.



**18.** If confirmed, please list and explain the top five priorities you will have as Assistant Secretary for Intelligence and Analysis.

- If confirmed, I anticipate my priorities will be:
  - Ensuring that OIA is effectively utilizing human resources (to include recruiting, training, and retaining a diverse staff) to enhance the financial intelligence expertise of OIA's workforce, particularly to support efforts countering China and Russia, as well as supporting Treasury's sanctions actions;
  - Ensuring that OIA continues to invest in modernizing data and information technology, and to leverage OIA's analytic expertise to maximize the benefits gained from such investments;
  - Implementing the priorities of the Secretary and the DNI, particularly with respect to countering China and ensuring the resiliency of the U.S. and allied economies;
  - Ensuring that OIA is developing and sustaining strong and productive partnerships with stakeholders across the Department, foreign partners, and, consistent with applicable authorities, the private sector; and,
  - Fostering an agile and innovative workforce.

**19.** If confirmed, do you commit to use your position and voice to press your Treasury counterparts to use OIA's analysis and assessments to advance the United States' economic competition with China? If so, how?

- If confirmed, I will commit to working to ensure that OIA's unique expertise and tools remain a critical element of Treasury's efforts maintaining the nation's economic leverage and leadership.

**20.** The PRC, its malign influence, and efforts to rewrite the international rules-based system is one of the greatest threats to U.S. national security. If confirmed, do you commit to prioritizing collection and analysis on PRC exploitation of the U.S. financial system to advance its political and economic goals?

- Yes, if confirmed, I will commit to working with the Office of the Director of National Intelligence to ensure that OIA and IC collection capabilities are arrayed against the nation's most important strategic issues related to economic security and financial intelligence, including challenges presented by China.