Dr. Grantham has also served as the Senior Fellow of National Security at the National Center for Policy Analysis (NCPA) and, before that, as an officer in the United States Air Force and Special Agent with the Air Force Office of Special Investigations (AFOSI).

Dr. Grantham holds a Ph.D. from Texas Christian University with specializations in Latin America and Middle East history. He earned his Master of Science in International Relations from Troy University and a Bachelor of Art in History from the University of South Florida in 2004.

Dr. Grantham is the author of **Consequences: An Intelligence Officer’s War about his time at Camp Bucca, Iraq - the birthplace of ISIS - released in November 2020.**
José Gustavo Arocha is a national security expert and SFS Senior Fellow, specialized in analyzing civil-military relations, violent conflicts, complex systems, and counter-transnational organized crime. He is a retired Lieutenant Colonel from the Venezuelan Army, having fled his home country in 2015 after confronting the totalitarian regime.

Mr. Arocha graduated with full honors in 1990 from Venezuela’s Military Academy, being the highest scoring officer in his promotion group when ascended to captain in 1998. Following his forced resignation from the Venezuelan Army in 2009. He was imprisoned for eight months without trial, kept in solitary confinement, and tortured in an underground prison known as “La Tumba.” Since escaping captivity in March 2015, he has resided in the United States.

Mr. Arocha received his Master’s in Public Administration from Harvard University in 2018, where he is an Edward S. Mason Fellow and a postgraduate degree in Organizational Development at Universidad Católica Andres Bello (UCAB) in Venezuela in 2003. He is also a Research Affiliate for the Center for Complex Interventions, a US-based research organization.[/vc_toggle][vc_column_text]

**BOTTOM LINE UP FRONT:**

As of 2022, Venezuela is responsible for distributing close to 400-450 metric tons of cocaine out of the global cocaine market of ~1800 metric tons. Therefore, the Cartel of the Suns went from a ~1% portion of the global market in 2010 to close to ~25% of the global market today.
Drug trafficking can exist for purposes other than profit. That is especially true when we consider Venezuela’s Bolivarian Revolution that from the outset was dedicated to the development and deployment of illicit drugs for purposes of asymmetric warfare against the United States.

Years of training in counterintelligence by Cuba, Russia, Iran, and China, gives members of the Maduro regime advanced ability to connect illicit drug networks to regime defectors and use deception in many of their operations to penetrate adversarial governments, namely in Colombia and the United States.

Today, the Maduro regime’s dependence on cocaine has forged deeper bonds with the Jalisco New Generation Cartel (CJNG) from Mexico. This relationship has seen CJNG increase its working relationships with the Venezuelan regime and its affiliates, like Colombia’s National Liberation Army (ELN) and Grupo Armado Organizado Residual (GAOR) E-30.

Potential policies to legalize or decriminalize Schedule II drugs need to consider the blowback in terms of threat networks from Venezuela and beyond that have already been operationalized to harm rural, urban, and suburban communities in the United States through massive drug overdose deaths.
American policy has for too long operated on the assumption that the drug business is solely a brutal, profit-driven enterprise. That idea doesn’t explain the skyrocketing death toll in the United States linked to lethal drugs. Instead, we must recognize that America faces a much larger menace. U.S. foreign adversaries are in an asymmetric war against the United States, and dangerous drugs are their weapon.

A previous report by the center, “Weaponizing Networks: Venezuela’s Asymmetric Attack on Texas,” introduced readers to the Venezuelan-led, Bolivarian threat network and its goals of asymmetric warfare against democracies in the Western Hemisphere. This collaborative network of criminalized governments, gangs, and non-state actors, none more important than Mexican drug trafficking organizations, the dissidents of the Fuerzas Armadas Revolucionarias de Colombia (Revolutionary Armed Forces of Colombia or FARC), and the Ejercito de Liberación Nacional (National Liberation Army or ELN), share a common adversary in the United States and seek to destabilize American communities through the intentional mass distribution of dangerous drugs.
And there was no one more important to this network than Venezuela’s Hugo Chavez. Chávez took a particular interest in Texas as the American state with a natural connection to Venezuela and its oil industry. But now, this network leverages its presence in Texas, through illicit drug networks, as a means to attack the United States.[1] With a 1,254-mile-long border, Texas is quite literally at the frontline of this conflict. It is crucial to understand how Texas became the battlespace in order to craft solutions to meet the challenge facing the United States.

**ASYMMETRIC WARFARE BUILT ON DRUG NETWORKS**

Drug trafficking can exist for purposes other than profit. That is especially true when we consider the Venezuela Threat Network and its founder, Hugo Chávez. The Venezuelan strongman was not a mere populist who became an anti-American socialist after
years of U.S. aggression. Rather Chávez and his Bolivarian Revolution were from the outset dedicated to the development and deployment of illicit drugs for purposes of asymmetric warfare against the United States. [2]

Recall that Venezuela has long been a transit point for cocaine produced in neighboring Colombia, Peru, and Bolivia. The country’s nascent drug networks consisted largely of informal, ad-hoc relationships between drug smugglers and corrupt officials. These irregular associations facilitated the use of border checkpoints, government offices, and other public resources for the covert transport of illicit narcotics. Hugo Chávez is credited with standardizing these networks, ostensibly making Venezuela into a “cocaine superhighway.” [3]

Part of Chávez’s major realignment was giving loyalists in the Venezuelan National Guard exclusive jurisdiction over ports, territories, airports, railways, and road networks. This move ensured trustworthy military officials were in control of logistics so that, among other things, proceeds from drug distribution would benefit the regime. [4] As Chávez realigned the National Guard, accusations swirled of corrupt troops collaborating with drug
Weaponized Drug Trafficking: How Venezuela Built a Super Cartel to Attack the United States

traffickers. By 1993, a year after Chávez’ failed coup, those accusations had a formal name: The Cartel of the Suns. The term derives from the insignia on the National Guard uniform, and was first used in conjunction with high-level investigations by the Drug Enforcement Administration (DEA) against Generals Ramon Guillen Davila and his successor, Orlando Hernandez Villegas for drug trafficking. [5]

By the mid-2000s, more elements of the National Guard joined the cartel activity just as Chávez leveraged the logistical infrastructure and economic strength of PDVSA – Venezuela’s state-owned oil company – to enhance his trafficking campaigns and to launder millions in profits. Massive amounts of cocaine would go on to transit Venezuela swiftly and efficiently on its way to the United States and Europe. [6]

Meanwhile, Chávez’s carefully crafted image of legitimacy won him a meeting with Texas resident and former U.S. President George H. W. Bush after his son entered the White
Weaponized Drug Trafficking: How Venezuela Built a Super Cartel to Attack the United States

House in January 2001, presumably to leverage Bush family connections to the oil economy of Texas.[7] Critics warned that Chávez was a fraud who was hostile to U.S. counternarcotics efforts and had concealed relationships with insurgents in Latin America who earned revenue from drugs.[8] Those concerns were validated in 2005 when the U.S. government announced that Venezuela had “failed demonstrably” to adhere to its drug control obligations under international counternarcotic agreements.[9] Chávez abruptly stopped cooperating with the DEA that same year.[10]

Then in 2006, Chavez established the autonomous and decentralized body La Oficina Nacional Antidrogas (The National Anti-Drug Office or ONA) through executive order. Roughly equivalent to the DEA, the ONA was charged with “combating” narcotics trafficking in the Bolivarian Republic of Venezuela.[11] In reality, according to the U.S. Department of Justice (DOJ), a high-ranking National Guard officer and director of the ONA, Nestor Reverol, aided internal and external drug operations from 2008 to 2010. Traffickers would obtain cocaine from Colombia, transport the cocaine to Venezuela, and then move the drugs to Central America and Mexico and onto the United States.[12]

Two years later, documents seized by the Colombian military during a 2008 raid directly linked Hugo Chávez to the FARC. The documents outlined how Chávez had sent the FARC a $300 million loan for new weapons and other equipment and agreed to take repayment in the form of cocaine shipments.[13] The cache also showed that Chávez’s support for the FARC had begun seven years before he even entered office in 1999. Douglas Farah, American national security scholar, explains that Chávez was “most active” with the FARC only after they had emerged as a “drug trafficking organization.”[14]

By 2010, the Venezuelan drug networks were reported to have exported 10 tons of cocaine a month to the United States.[15] As of 2022, Venezuela is responsible for distributing close to 400-450 metric tons of cocaine out of the global cocaine market of ~1800 metric tons. Therefore, the Cartel of the Suns went from a ~1% portion of the global market in 2010 to close to ~25% of the global market today. [16]


Weaponized Drug Trafficking: How Venezuela Built a Super Cartel to Attack the United States
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353,841 sq mi
AREA OF VENEZUELA

268,596 sq mi
AREA OF TEXAS

GDP VENEZUELA
$42.5 Billion (2021)

GDP TEXAS
$2.0 Trillion (2021)

POPULATION VENEZUELA
28.44 Million (2020)

POPULATION TEXAS
28.64 Million (2020)

OIL PRODUCTION VENEZUELA
650 THOUSAND BARRELS PER DAY (2021)

OIL PRODUCTION TEXAS
4.04 MILLION BARRELS PER DAY (2021)

VEnezuela has the largest proven oil reserves on the planet
DRUG DISTRIBUTION AS A SOPHISTICATED COUNTERINTELLIGENCE OPERATION

The crucial element in Hugo Chávez’s strategy, which ended up turning the Venezuelan government into a drug trafficking organization, was the merging of military and intelligence services with drug trafficking operations. Chávez’s use of the entire Venezuelan government birthed a unique angle within this asymmetric war: sophisticated counterintelligence operations based on drug distribution, illicit arms trafficking, and infiltration. There are several cases that illustrate how this strategy has possibly played out in Venezuela and the United States.
Weaponized Drug Trafficking: How Venezuela Built a Super Cartel to Attack the United States

THE BOLIVARIAN REVOLUTION
DRUG NETWORK

MADURO REGIME - VENEZUELA
High Ranking Military, Intelligence, Assemblyman and Judiciary Personnel, Naza State

CARTEL OF THE SUNS - VENEZUELA
General Vladimir Padrino Lopez (Current Minister of Defense), General Hector Ravina (former Minister of Electoral Energy), General Diego Mora (former Director of Intelligence Services

FARC-D AND ELN - COLOMBIA
AT-4 Anti-Tank Weapons, AK-47 Rifles & Ammunition (Brokered by Cartel of Spies with the transfer taking place in Venezuela)

ELN

ISLAMIC REVOLUTIONARY GUARD CORPS-QODS FORCE (IRGC-QF)
Counterintelligence, militia training and logistical support

USA - TEXAS
Mexico, Caribbean, Nicaragua and Honduras (Transit)

CARCOSE Trafficking by Air & Sea (1000-1500) Tons per year

MEXICAN CARTELS - MEXICO
* Jalisco New Generation Cartel
* Sinaloa Cartel

HEZBOLLAH - LEBANON
Terrorist Recruitment, Training and Potentially Engages attacks in Venezuela against US Interests; Farsi Liaison Discussions

BASHAR AL-ASSAD REGIME - SYRIA
Cartel of the Sun Members Laid, terrorist organizations and Fifty members of Hezbollah Forces Supporting the Assad Regime.
HUGO CARVAJAL CASE

Hugo Carvajal Barrios was the head of Venezuela’s military intelligence and counterintelligence unit under Hugo Chávez and a high-ranking military official in the political apparatus for more than a decade. He has been accused, among other things, of using his government position to coordinate a 2011 shipment of more than five tons of cocaine to Mexico, some of which most likely entered Texas.[17] He is also alleged to be responsible for a 2006 transport of approximately 5,600 kilograms of cocaine from Venezuela to Mexico.[18]

According to the State Department, Carvajal Barrios, as a leader and manager of the Cartel of the Suns, participated in a corrupt and violent narco-terrorism conspiracy with the FARC, conspiring to transport and distribute large cocaine shipments; benefit from, and cause others to participate in, the provision of heavily armed security to protect cocaine shipments.[19] The result was large quantities of previously-seized cocaine to be sold to drug traffickers in exchange for millions of dollars; interfere with drug-trafficking investigations and pending criminal cases in Venezuela and elsewhere; and help provide the FARC with military-grade weapons.
After the transition from Hugo Chávez to Nicolas Maduro, Carvajal continued to oversee the military’s counterintelligence operations and was briefly Venezuela’s consul general in Aruba. He escaped extradition to the U.S. in 2014 while in Aruba by fleeing back to his Venezuela. He was then elected to the National Assembly in 2015 as a member of the governing socialist party. [20]

In February 2019, when the U.S. supported Juan Guaido as Venezuela’s interim president, the former spymaster [Hugo Carvajal] publicly claimed to have broken ranks with the Maduro regime. This occurred just before U.S. investigators had him arrested in Maduro-friendly Spain on drug trafficking charges. [21] However, Carvajal alluded his extradition again and went missing in late 2019. He was re-arrested in September 2021 and has been fighting against extradition to the United States ever since. [22] In March 2022, Spain’s High Court said it had suspended the extradition of Hugo Carvajal to the United States after he appealed before the European Court of Human Rights (ECHR).[23] Two months
later, the European court requested any relevant information on the applicable legislation and practice of courts in the U.S. in similar proceedings, regarding both sentencing and review of life sentences. [24]

ADEL EL ZABAYAR CASE

Adel El Zabayar, a Syrian-Venezuelan former Assembly member and accused criminal and terrorist facilitator, was charged by the U.S. Department of Justice (DOJ) with narco-terrorism, drug trafficking, and weapons offenses in May 2020. The accompanying DOJ press release highlighted relationships between Venezuela and Middle East terrorist organizations, which began developing as far back as 1999. [25]
Adel El Zabayar was part of the Bashar al Assad regime’s army during the Syrian Civil War. [26] In this role, he reportedly connected an unholy alliance of Venezuelan regime, military, and FARC members using violence and corruption to further their narco-terrorist aims.

El Zabayar was allegedly also a key part of the apparatus that conspired to export tons of cocaine into the U.S. According to the indictment, the Cartel of the Suns sought to recruit terrorists from Hezbollah and Hamas to assist in planning and carrying out attacks on the U.S., and that El Zabayar was instrumental as a go-between. Allegedly, in 2014, El Zabayar obtained a cargo planeload of military-grade weaponry from the Middle East that was delivered to dissidents of the FARC at the Capitan Manuel Rios Airbase in Venezuela. [27]

Until May 2021, El Zabayar was the president of the Federation of Arab Entities and Associations of Venezuela (FEARAB), leading forty-six (46) institutions and organizations that connect more than two (2) million Venezuelan-Arabs from the Palestinian, Lebanese, and Syrian communities. [28] Currently, El Zabayar uses his social media platforms to criticize the economic and diplomatic policies of the Maduro regime, [29] possibly as an attempt to, much like Carvajal, show a “break” with the Venezuela regime.

**CLIVER ALCALA CASE**

According to the State Department, Cliver Alcala was a high-ranking Venezuelan general tapped by the Chávez regime to manage Venezuela’s vital relationship with the FARC and its cocaine production on the Colombia-Venezuela border. [30] During Chavez’s rule, Alcala coordinated weapons transfers to the FARC, supervised the transport and distribution of cocaine, and managed armed security for regional distribution networks. [31] Alcala was one of the most important players of the Cartel of the Suns at the time. [32]
Alcala retired from military service after Chávez’s death in 2013 and soon after curiously claimed to have broken away from the Venezuelan regime. Meanwhile, as Cliver Alacala defected, his brother General Carlos Alcala Cordones, was appointed as Venezuela’s ambassador to the Islamic Republic of Iran. [33] Cliver Alcala fled to Colombia as a dissident but seemed to have maintained some ties with those close to the regime – based on the results of the failed attack against the Maduro regime in May 2020, known as Operation Gideon. [34] In any case, U.S. authorities charged him in March 2020 with “narco-terrorism,” and Alcala accepted extradition to the United States in July of that year.

Cliver Alcala’s attorneys denied the narco-terrorism charges and stated that the U.S. government may have known about Alcala’s coup plotting. They said they believe Alcala’s activities “were communicated at the highest levels of some U.S. government agencies,” including the CIA, Treasury and Justice departments, the National Security Council (NSC), and the DEA. [35]
In March 2022, a U.S. Judge rejected a bid by the retired Venezuelan general and his attorneys to dismiss drug trafficking charges against him on the basis of foreign sovereign immunity, saying the doctrine does not apply to a “rogue state.” [36]

These cases illustrate how prominent members of the Bolivarian revolution have, over time, used drug networks from Venezuela to establish its presence as far afield as in Spain and Syria, and as close as Colombia to later use those same networks in those countries to legitimize their status as defectors.

**The cases provide insight into the possibilities that the Maduro regime continues its counterintelligence operations in those countries with support from external actors, in an effort to penetrate adversarial governments, namely Colombia and the United States. Years of training in counterintelligence by Cuba, Russia, Iran, and China, gives members of the Maduro regime advanced ability to connect networks and use deception in many of their operations. Venezuela, under the Maduro regime, is beyond a criminalized state. It is now a multi-dimensional threat.**

**THE SUPER CARTEL AGAINST THE UNITED STATES**

In the narcotics world, a convergence occurs when a legitimate nation-state provides access to other criminal states with ties to drug trafficking organizations. The U.S. government refers to this as a “super cartel” and it is a description that fits the Maduro regime.[37]

Several indictments describe how Venezuelan judiciary, military, and intelligence institutions are in cahoots with extra-regional state actors, such as Iran and Syria, and regional non-state actors, such as the ELN and the FARC-D in Colombia, along with the Sinaloa and Jalisco New Generation Cartel (CJNG) cartels in Mexico. Sovereignty, access to advance weaponry, and political positions in international bodies were previously unattainable powers, now indirectly available to this super cartel who is bent on waging asymmetric warfare against the United States.

A May 2020 U.S. affidavit spells out how the Venezuelan regime worked with Hezbollah and Hamas to launder drug proceeds and plan out attacks against the United States. The regime had “weaponized” cocaine, it reads, flooding American communities with enough drugs to cause instability, addiction, and death. [38]
The network has also absorbed Mexican cartels. It could be said that cocaine determines the relationships of the Maduro regime, making it no surprise that the regime has fostered deep relationships with the Sinaloa Cartel and the CJNG.
Weaponized Drug Trafficking: How Venezuela Built a Super Cartel to Attack the United States

REWARD
OF UP TO
$15,000,000.00 USD
FOR INFORMATION LEADING TO THE ARREST AND/OR CONVICTION OF:

Nicolas Maduro Moros

+1-202-681-8187
SUBMIT TIPS TO
Phone, WhatsApp, Signal

CartelSolesTips@usdoj.gov
The notorious Sinaloa cartel once operated the most resilient drug distribution network in the United States, boasted considerable political influence, and maintained a permanent presence along the U.S. southwest border. [39] That strength earned it access to Margarita Island, a tightly controlled smuggling territory for the Cartel of the Suns and tacit control of most of the western area of the rich oil Venezuelan state of Zulia in Venezuela. [40] InSight Crime, a regional news portal dedicated to reporting on transnational organized crime, also describes how members of the Sinaloa Cartel live in San Felipe, a municipality of Machiques de Perijá, in Zulia, one of the most sought-after routes for its border with Colombia and its outlet to the Caribbean. [41]

In the 2000s drug traffickers in Zulia State (Venezuela) used to buy their narcotics from the FARC guerrillas, but in the wake of the FARC’s demobilization in 2016, the Sinaloa and Jalisco New Generation cartels from Mexico have stepped into the supply chain, negotiating directly with crop growers and manage relations with armed groups, such as the ELN and FARC dissidents. [42]

Today, the Maduro regime’s dependence on cocaine has forged deeper bonds with the CJNG. The Jalisco Cartel is made up of former Sinaloa members who operate similar logistical networks, significant political access, and possess expertise in moving cocaine into the United States. [43] This relationship has seen CJNG increase its working relationships
with Cartel of the Suns’ affiliates, like the ELN and Grupo Armado Organizado Residual (GAOR) E-30.

A DEADLY THREAT NETWORK

Today’s convergence among the Venezuela Threat Network and Mexican cartels has both expanded the portfolio of dangerous drugs used against American communities, enlarged the number of combatants in this asymmetric war, and amplified the amount of harm done against the United States. Combined with the counterintelligence capabilities of the Maduro regime, this presents a top national security threat to the United States.

According to DEA Administrator Anne Milgram, “Mexican Cartels are acting with calculated, deliberate treachery to get fentanyl to the United States and to get people to buy it through fake pills, by hiding it in other drugs, and any means that they can take in order to drive addiction and to make money.” [45] And the results are deadly.

Fentanyl poisoning is the leading cause of death among Americans 18-45 years old. The Centers for Disease Control and Prevention (CDC) reported that an estimated 105,752 Americans died from fentanyl-related overdoses in the 12-month period ending in October 2021. [46] And these statistics do not reflect the deaths of routine drug users whose bodies simply gave out after years of abuse. Teen overdose deaths jumped nearly 95% from 2019-2020. The number one cause of accidental death in the United States in 2020 was accidental overdose. [47]

In 2020, the Centers for Disease Control and Prevention (CDC) reported 19,927 deaths from cocaine overdose, the highest number recorded in at least two decades. [48] That number only rose in 2021 to 24,538 deaths. [49]
### Overdose Deaths USA

<table>
<thead>
<tr>
<th>Drug Type</th>
<th>Deaths 2021</th>
<th>Deaths 2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>Synthetic Opioids (fentanyl)</td>
<td>71,238</td>
<td>57,834</td>
</tr>
<tr>
<td>Psychostimulants (meth)</td>
<td>32,856</td>
<td>24,576</td>
</tr>
<tr>
<td>Cocaine</td>
<td>24,538</td>
<td>19,927</td>
</tr>
<tr>
<td>Natural/Semisynthetic (prescription)</td>
<td>13,503</td>
<td>13,722</td>
</tr>
</tbody>
</table>

**Total Deaths 2021**  
**142,135**

*Source: Centers for Disease Control and Prevention - CDC*
This fact of war is evident even in the words of those involved. A cartel member once said they would send whatever “kills the gringo [Americans].” [50] Mexican cartel music groups, known as narcobands, have narco-ballads, or songs, that glorify killing Americans with drugs. Former president of Honduras, Juan Orlando Hernández, who was extradited to the United States to face drug trafficking charges in April 2022, allegedly told an accomplice to “shove cocaine right up the nose of the gringos.” [51] Finally, the U.S. Department of Justice (DOJ) issued indictments in 2020 that allege the Maduro regime in Venezuela weaponized dangerous drugs for the express purpose of harming Americans and destabilizing U.S. communities. [52]

The Venezuela Threat Network and its convergence with the Colombian and Mexican Cartels is responsible for the delivery of massive quantities of narcotics into the United States. While a majority of organized crime groups treat the narcotics trade as a business, the Venezuela Threat Network sees it as an opportunity to harm Americans.
TEXAS IS VULNERABLE TO THIS THREAT

These developments are of concern for all Americans and especially for Texans. CJNG has a significant presence in the Lone Star State, much more than Sinaloa ever had. More problematic is CJNG’s access to deadly drugs, like fentanyl.

Fentanyl seizures in Texas jumped 800% from April 2020 to April 2021. In 2021, cocaine seizures totaled 97.6 kilograms. With a few months left in FY2022, seizures amounted to 53.9 kilograms. The threat from weaponized drugs poses a much greater danger should the Maduro regime decide to expand its arsenal beyond cocaine. For example, Venezuela and Syria are close allies with direct flight connections. Currently, Syria...
has become a narco-state based on the massive production of Captagon, one of several brand names for the drug compound fenethylline hydrochloride. A stimulant with addictive properties, it is used recreationally across the Middle East and is sometimes called a “poor man’s cocaine.”

With Texas as one of the gateways to the rest of the country, bolstering its defenses supports the entire United States. Texas needs to not only strengthen existing organized crime laws to give law enforcement and prosecutors the teeth to permanently dismantle these networks, but the state also needs to dust off its Sedition statue and use it to tackle this threat.

The Venezuela Threat Network and its Mexican cartel allies are together and separately seditious in nature, meeting basic elements of the law as a “clear and present danger to the security of the state or political subdivision of this state.” They seek to corrupt, kill, and destabilize public and private systems and organizations because more power brings them more profit.

Texas is home to America’s most important national security assets and the longest southern border of any U.S. state. It is also the heartbeat of America’s defense and the forefront of its national security technology. Texas has long been the target of the Mexican
cartels and Venezuela’s Bolivarian Revolution, and its goals of asymmetric war, making it the United States’ frontline. Chavez, then, and Maduro, now, see America’s war on drugs as an opportunity to wage their own quasi-war against the United States.

Potential policies to legalize or decriminalize Schedule II [58] drugs need to consider the blowback in terms of threat networks from Venezuela and beyond that have already been operationalized to harm rural, urban, and suburban communities in the United States through massive drug overdose deaths. Recognizing this is the first step toward developing strategies for America’s counter-narcotics efforts and U.S. national security.

NOTES

Weaponized Drug Trafficking: How Venezuela Built a Super Cartel to Attack the United States


15. Ibid, 43.


Weaponized Drug Trafficking: How Venezuela Built a Super Cartel to Attack the United States

Weaponized Drug Trafficking: How Venezuela Built a Super Cartel to Attack the United States


43. A submarine operator with CJNG was arrested in August 2020 by Colombian authorities while trying to smuggle a ton of cocaine into Mexico destined for the United States. “Colombian authorities deliver a major blow to CJNG by seizing one ton of cocaine,” Yucatan Times, August 25, 2020.

44. Ibid.


50. Author interview.


53. Ibid.


Weaponized Drug Trafficking: How Venezuela Built a Super Cartel to Attack the United States