

SELECT COMMITTEE ON INTELLIGENCE

UNITED STATES SENATE



**Additional Pre-Hearing Questions for Peter T. Metzger II
upon his 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.

- **Answer: If confirmed for this position, I will pledge to ensure that OIA will provide the most timely and accurate intelligence information possible to the Secretary and the Director of National Intelligence.**

2. If conflicts arise between the priorities of the DNI and the Secretary of the Treasury, how will you act to resolve them?

Answer: If confirmed, I will coordinate effectively with both the Secretary and the DNI and work diligently to resolve any such conflicts consistent with Administration priorities.

3. Please explain your understanding of Treasury's Office of Intelligence and Analysis's (OIA) responsibilities and authorities within the Intelligence Community (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?

- **Answer: 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 role in the national security space. OIA, as the IC 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, and I view OIA as the IC's lead agency on financial intelligence issues. 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?

Answer: 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. 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 Committee on Foreign Investment in the United States (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?

Answer: It is my understanding that serving as the CFIUS chair is one of Treasury's most critical national security responsibilities. OIA has an important role in supporting the National Security Threat Assessments produced by the DNI and providing additional intelligence support to the chair. If confirmed, I will work with OIA, TFI, and the Office of Investment Security 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.

Answer: 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 IC component housed within the Department of the Treasury, a non-IC 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 IC element under the National Security Act of 1947. Such a designation comes with challenges in coordination and information sharing both within the Treasury Department as a whole, and with the broader IC.
 - 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?
 - **Answer: 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 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?
 - **Answer: 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 Treasury's Office of General Counsel. 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. 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?

- Answer: 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 13224 and sections 311 and 312 of title 31 of the U.S. Code.**
- If confirmed, I will also 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.**

9. 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?

Answer: It is my understanding that OIA is concerned about the threat that Iran-backed terrorist groups, including Hamas, Hizballah, the Huthis, and Iraqi Shi'a Militia groups, pose to the United States and its regional interests abroad. If confirmed, I will support OIA actively working to disrupt their ability to indigenously generate revenue, as well as receive financial support from Iran.

It is further my understanding that the largest ISIS threat to the United States emanates from ISIS-Khorasan (ISIS-K), which has the ambition and capabilities to conduct attacks beyond the Central Asia region. Likewise, al Qaeda affiliates in Africa serve as key revenue sources for al Qaeda's global operations, enabling plotting against U.S. interests and persons. If confirmed, I will support OIA continuing to monitor

and assess ISIS-K, al Qaeda, and other affiliates' financial capabilities and vulnerabilities that can be targeted by our own authorities as well as those of our allies and partners.

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

- **Answer: 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.**

11. What issues related to strategic competition with near peer competitors 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.

- **Answer: If confirmed, I will work with OIA, TFI, and Treasury senior leadership more broadly to review issues and priorities related to strategic competition.**
- **I also understand that OIA stood up a Cyber and Emerging Technology Intelligence component to analyze our adversaries' growing cyber capabilities and adoption/use of emerging technology, such as artificial intelligence (AI), to target our critical financial infrastructure, as well as the financial networks that enable these activities.**

12. 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?

- **Answer: I understand that the Administration recently published a report laying out proposals to ensure U.S. leadership in digital asset technologies, including related to illicit finance. I look forward to**

working on this effort, if confirmed. I can assure you that addressing sanctions evasion using any form of currency will be an important priority of mine, including addressing sanctions evasion by those who seek to use digital assets. If confirmed, I pledge that Treasury will continue to use its tools and authorities to protect the digital assets ecosystem from sanctions evaders and other illicit actors, including drug traffickers and cybercriminals.

13. It is critical that OIA has 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?

- **Answer: It is my understanding OIA is fortunate to have many talented and experienced technical experts on cyber threats and digital assets. 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.**

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

- **Answer: 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.**

15. 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?

Answer: Yes.

16. Please list and explain the top five priorities you will have as Assistant Secretary for Intelligence and Analysis, if confirmed.

Answer: If confirmed, I would prioritize the following:

- i. **Ensure that OIA is organized to support the President and the Secretary's efforts to leverage the strength of the U.S. financial system toward U.S. policy and security objectives;**
- ii. **Provide specific, detailed intelligence collection to enable deterrence against global narco-terror organizations, transnational organized criminals and any nation states that support them, while ensuring adequate intelligence focus against legacy terror organizations to preclude their terror finance activities;**
- iii. **Provide to the President, the Secretary of the Treasury, and Cabinet officials timely, relevant, and policy-enabling intelligence focused against adversarial nation state actors whose interests run counter to U.S. national security;**
- iv. **Focus collection and analysis on nefarious financial activities of the Islamic Republic of Iran, the Russian Federation, the Democratic People's Republic of Korea, and the Chinese Communist Party; and**
- v. **Assess the counterintelligence and security posture within OIA and Treasury generally to ensure that the organization, its systems, and its personnel maintain a hard-target posture against witting adversaries.**

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

Answer: 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. OIA

leads the IC on economic and financial intelligence issues, and I understand that the PRC is at the forefront of these concerns not just within Treasury, but the wider economic policymaker space. As such, I will work to make sure that OIA's work is available and widely read, and that OIA products continue to be highly relevant in supporting policymaker objectives.

- 18.** 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?

Answer: Yes, if confirmed, I will commit to prioritizing analysis that will help the Treasury Department safeguard the U.S. financial system. I would also be working closely with the Office of the Director of National Intelligence and the collector community to ensure that they understand the priorities assigned to economic and financial threats stemming from the PRC.

Questions from Senator Wyden

Shell companies

19. Earlier this year, the Department of Treasury announced that it no longer intended to enforce the Corporate Transparency Act, which requires the disclosure of true owners of anonymous shell companies, against U.S. persons and entities. Treasury's refusal to enforce the law could remove reporting requirements from as many as 99.8 percent of otherwise covered entities. During a House Financial Services Committee on strategies to counter China, former CIA officer and Treasury Special Agent John Cassara noted, in response to a question about countering Chinese fentanyl trafficking, that "once the money is layered and integrated into the economy, we don't know who owns that shopping center, who owns that yacht, who owns that property. We need beneficial ownership information." Do you believe that accurate beneficial ownership information is necessary to tracking and countering foreign threats such as those posed by China and that the full enforcement of the Corporate Transparency Act strengthens our ability to counter illicit trafficking?

Answer: As Secretary Bessent has said, "Malicious use of multijurisdictional corporate structuring is a tool that malign actors have employed to obscure their illicit activities." I understand stemming the flow of drugs to be a key priority of this Administration. If confirmed, I look forward to examining OIA's contributions to this effort, for example assessing illicit financial activity associated with the drug trade. I will also be looking at how the IC tracks related threats posed by China and others, and how to best inform decisionmakers with all the resources at our disposal.

Counterintelligence

20. According to press reports, in May, an investment firm owned and operated by the Abu Dhabi ruling family made a \$2 billion investment into World Liberty Financial, a cryptocurrency company founded by the Witkoff and Trump families. The Trump family owns between 40 to 60% of World Liberty Financial, and President Trump's adult sons are actively involved in the management of the company. Two weeks later, the Administration announced a deal that would allow the UAE access to highly sensitive

microchips, despite reported concerns from national security officials that the chips could be shared with China.

- a. Do you agree that billions of dollars in foreign investments into companies owned by the families of U.S. officials may present counterintelligence concerns?
- b. If confirmed, will you provide a report to the Committee on all sources of foreign financing for World Liberty Financial? The report would include a detailed accounting of all foreign individuals and entities that have invested in World Liberty Financial, as well as ties to the UAE and other foreign governments.

Answer: If confirmed, I pledge to consult with my colleagues and to appraise them of your concerns.

Public reporting

- 21. Major companies are increasingly forgoing initial public offers and instead raising financing through private funding. Does the lack of public reporting that results from this pattern have a detrimental effect on all-source intelligence related to financial matters? How does the President's recent proposal to reduce public company filing requirements affect your views?

Answer: If I am confirmed, I look forward to consulting with my Treasury colleagues to understand the effects of this decision on Treasury intelligence analysis.

Cybersecurity

- 22. In December 2024, the Treasury Department's systems were breached by hackers from China, through a hack of a vendor, BeyondTrust, whose product is used to allow agency helpdesk personnel to remotely troubleshoot other agency employees' work computers. The underlying cybersecurity problem that resulted in this incident was Treasury's unwise decision to give its vendor the encryption keys used to access employee computers, which the hackers stole from BeyondTrust, rather than maintaining custody of those sensitive keys. If confirmed, will you commit to ensuring that the

Department maintains custody of all encryption keys that enable remote access to agency computers, and that such keys are stored securely in a Hardware Security Module, consistent with federal best practices published by the National Institute of Standards and Technology?

Answer: I am not yet at the Department so I cannot comment on the specifics of their encryption requirements or this specific incident. However, what I can tell you is that protecting the Department's systems from cyberattacks is critically important. Treasury's national security role—including its role administering and enforcing sanctions, serving as our nation's financial intelligence unit, and administering taxes—makes it a prime target for cybercriminals. If confirmed, I would use all the tools at my disposal to make sure we're using the appropriate cybersecurity processes and protections.