

DISRUPTING U.S. ARMS TRAFFICKING TO HAITI

INTERNATIONAL
HUMAN RIGHTS CLINIC
 HARVARD LAW SCHOOL

In collaboration with the
Stop Illegal Weapons
Trafficking to Haiti Coalition

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A Country in Crisis

Haiti is in the grips of a catastrophic human rights and security crisis. Armed criminal groups have seized control over large swaths of territory and are carrying out massacres and other grave abuses against civilians with near-total impunity.¹ In 2025 alone, the UN reported 8,100 people were killed and 1.5 million Haitians are currently internally displaced by the violence.² The crisis has disrupted every facet of life. Half the population—5.8 million people—do not have enough to eat and require emergency humanitarian assistance.³ As the international community ratchets up security support, including through a new Gang Suppression Force (GSF) that began deploying in April 2026, the United States and other governments have a key opportunity to combat the illicit arms trafficking to Haiti that fuels the violence. The GSF should support the Haitian government's efforts to scale up weapons seizures; improve documentation, safekeeping, and destruction of seized arms; and increase weapons tracing. At home, the U.S. Government should increase monitoring of illegal diversions, facilitate weapons tracing, and scale up inspections and targeted enforcement. Such efforts are critical to exposing trafficking networks, promoting accountability, and ultimately disrupting the flow of arms into Haiti.

Illicit trafficking of American firearms fuels human rights violations in Haiti.

Haiti's crisis is fueled by easy access to high-caliber weapons smuggled in from abroad.⁴ Haiti has no domestic firearms or ammunition manufacturers, yet the number of firearms circulating in the country continues to grow,⁵ with an estimated 500,000 small arms in the country as of 2020.⁶ Most weapons entering Haiti are trafficked from the United States, either directly or through intermediary countries.⁷ Traffickers find the United States to be an attractive source of firearms, due in part to the country's limited controls over firearms transactions.⁸ Data from the U.S. Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) indicates that the United States was the source of approximately 73% of firearms recovered and traced in Caribbean countries between 2018-2022.⁹ In recent years, the firearms trafficked into Haiti have become increasingly high-caliber.¹⁰

Trafficking activity appears to be highly geographically concentrated, raising the prospects that some gun dealers are engaged in unlawful sales.

Leaders of armed groups in Haiti rely on accomplices or coerce former community members and associates now living in the United States into procuring weapons on their behalf.¹¹ This kind of straw purchasing, or purchasing of a firearm on behalf of a third party, is a crime under U.S. federal law.¹² In the last year alone, several individuals have pleaded guilty to, or been found guilty of, crimes related to firearms trafficking into Haiti.¹³

Our analysis of available ATF trace data confirms that most firearms (78%) recovered in Haiti and submitted for tracing between 2015 and 2024 were sold in Florida.¹⁴ Other contributing states include South Carolina (3%), Georgia (3%), and North Carolina (2%).¹⁵ Within Florida, firearms traces are primarily clustered in the Miami, Orlando, and Tampa Bay metropolitan areas. Dealers in Boynton Beach and Coconut Creek/Pompano Beach show the highest concentration of firearms linked to recoveries in Haiti.¹⁶

The concentration of firearms within specific commercial corridors suggests that traffickers and straw buyers are likely repeat customers at particular gun shops.¹⁷ This pattern persists in part because gun dealers are engaging in unlicensed sales or ignoring red flags of straw purchasing with impunity.¹⁸

Once purchased, firearms and ammunition are often incorporated into outbound shipments destined for Haiti or another intervening destination in the Caribbean, such as the Dominican Republic.¹⁹ As U.S. Customs and Border Patrol (CBP) does not customarily scan outgoing shipments, shipments carrying contraband weapons are often able to leave port undetected.²⁰

The United States and the U.S. gun industry have legal obligations to prevent arms trafficking.

Under international law, both the U.S. government and the private gun industry are required to do their part to prevent firearms from being diverted for trafficking.²¹ Recognizing the pervasiveness of arms trafficking into Haiti, in 2022 the UN Security Council implemented an Arms Embargo that requires the United States and other countries to ban the supply, sale, or transfer, of all firearms and ammunition to Haiti.²² The United States has accordingly implemented firearms export controls which bar the commercial transfer of firearms to Haiti.²³ The U.S. government has also generally sought to deter trafficking by making the straw purchasing of firearms and arms trafficking federal crimes.²⁴

Gun dealers that sell to arms traffickers could face criminal and civil liability under U.S. law.

Under U.S. law, all firearms dealers must be federally licensed.²⁵ Federally-licensed gun dealers (FFLs) must in turn comply with several regulations to execute a lawful sale of a firearm or ammunition, including procedural and record-keeping obligations such as conducting background checks, filling out ATF Form 4473, and reporting certain types of sales – including certain repeat sales – to the ATF.²⁶ These regulations exist precisely to prevent straw purchases and arms trafficking.²⁷ In fact, the ATF has emphasized FFLs' critical role as the first line of defense against straw purchasing.²⁸

Gun dealers that falsify required transaction records, fail to submit mandatory reports of multiple firearm sales, or knowingly participate in straw purchasing or gun trafficking schemes may face criminal liability.²⁹ In light of the designation of two of Haiti's major armed groups as Foreign Terrorist Organizations (FTOs), gun dealers that supply guns to these groups could also face criminal liability for providing material support.³⁰ Similarly, gun dealers that directly or indirectly supply arms to leaders of the armed groups who are on U.S. sanctions lists could be liable for violating sanctions laws in addition to firearm-related regulations.³¹

When an FFL ignores red flags and engages in negligent sales to straw buyers or traffickers, they could also face civil suits for their role in supplying guns used by armed gangs in Haiti. In the ongoing, analogous case of *Estado Unidos Mexicanos v. Diamondback Shooting Sports Inc.*, the government of Mexico sued several Arizonan gun dealers over repeated unlawful sales to straw purchasers and arms traffickers.³² The district court found that the violations could be grounds to hold the gun dealers liable for harms in Mexico, raising the prospects that they will ultimately face civil liability for their role in supplying arms trafficked to Mexico.³³

Insufficient firearms tracing leaves U.S. and Haitian authorities in the dark about trafficking activity.

Despite the laws on the books, weak enforcement by authorities in the United States and Haiti has allowed the problem to endure. Crucially, the ATF has incomplete information about the flow of U.S.-sourced firearms into Haiti because of limited tracing of weapons recovered in Haiti.³⁴ While the ATF has the technical capacity to trace American firearms recovered abroad, it relies on foreign law-enforcement partners to submit firearm trace requests, typically through its eTrace system.³⁵ Haiti is not a consistent participant in eTrace, however, as authorities lack the technical capacity, record-keeping systems, infrastructure, and political will necessary to collect and transmit serial-number data for comprehensive tracing.³⁶ Additionally, the eTrace platform is not available in French or Haitian Creole, making it inaccessible for most Haitian police.³⁷ As a result, only 305 firearms were recovered and traced in Haiti between 2018 and 2022,³⁸ even as escalating violence and new materiel displayed by armed groups suggest that trafficking has continued unchecked.³⁹

Recent efforts are under way to step up tracing in Haiti. For example, the ARMAS Act currently pending in Congress would mandate the State Department to work with ATF to increase international participation in the eTrace system, require availability of the system in French and Haitian Creole, and promote use by partners like the Haitian government.⁴⁰ More tracing would in turn allow U.S. law enforcement to identify, investigate, and ultimately prosecute a greater number of dealers and purchasers who are involved in illicit weapons sales and trafficking. Strengthening accountability for the U.S. gun industry actors who enable illegal trafficking is crucial to disrupting arms flows to Haiti and preventing human rights abuses.

Recommendations for U.S. Actors

Increase tracing through the GSF.

The deployment of the U.S.-supported GSF provides a crucial opportunity to gather sorely needed information about the flow of weapons into Haiti. The GSF is already authorized to “seize and collect, record and dispose of illicit arms, ammunition, and other materiel.”⁴¹ Pursuant to this authority, GSF forces should record and preserve data related to, at a minimum, the make, model, serial number, and circumstances of the recovery of all weapons seized. They should then submit this data to the ATF’s eTrace database. GSF leadership should also provide training, procedures, and resources to support Haitian authorities in these efforts. The United States should take an active role in advancing these efforts, considering its responsibility to provide strategic direction and oversight as a member of the GSF Standing Group of Partners.⁴²

Support Haiti’s capacity to seize and trace arms.

Increasing the seizure and tracing capacity of Haiti’s national police is critical to improving the country’s long-term security. The United States should increase cooperation with Haitian authorities to identify and close gaps in training, procedures, technology, and compliance that are causing firearms to go untraced. In particular, U.S. and Haitian authorities should address weaknesses in Haitian law enforcement capacity with respect to the seizure, safeguarding, and responsible disposal of firearms. U.S. and Haitian authorities should also examine the systems that Haitian law enforcement use for recording and tracking weapons after they enter police custody. These systems should facilitate the recording and preservation of data related to, at a minimum, the make, model, serial number, and circumstances of the recovery of all firearms seized. Such data should then be submitted consistently to the ATF’s eTrace database for tracing.

The Department of Homeland Security (DHS)’s Homeland Security Investigations (HSI) has already established a transnational criminal investigative unit (TCIU) in Haiti.⁴³ DHS should ensure that the Haiti TCIU is adequately resourced to facilitate tracing efforts.

Improve language accessibility of the eTrace system.

The eTrace platform is not available in French or Haitian Creole, which has hampered the platform’s adoption by Haitian law enforcement. ATF should provide access to the eTrace platform in French and Haitian Creole.

Increase inspections of FFLs in Florida.

Given the clear concentration of trafficking activity in Florida, ATF should dedicate more resources to investigating FFLs in the state. ATF should focus on metro areas with high absolute trace numbers, including Miami, Orlando, and Tampa Bay, along with zip codes in which trace numbers are high relative to the number of FFLs in operation.

Step up cargo scanning of outbound shipments.

Improving the detection of illicit cargo before it leaves port in South Florida is key to disrupting arms flows. Accordingly, CBP and HSI should increase resources and personnel devoted to inspecting and scanning ships that are leaving Miami River ports destined for Haiti.

Carry out targeted enforcement against FFLs engaged in unlawful sales.

ATF and HSI should follow up on trace data that links firearms recovered in Haiti to specific U.S. dealers by increasing inspections and, where appropriate, carrying out targeted enforcement actions to crack down on unlawful activity.

Endnotes

¹ See generally Inst. for Just. & Democracy in Haiti (“IJDH”), Human Rights and the Rule of Law in Haiti: Key Recent Developments: July 2025 Through February 2026 (March 2026), <https://reliefweb.int/attachments/b9ebf742-9543-45ef-9c0a-17602fef792f/March-2026-Human-Rights-and-the-Rule-of-Law-in-Haiti-Key-Recent-Developments.pdf>; United Nations Integrated Office in Haiti (BINUH), *Report of the Secretary-General*, U.N. Doc. S/2026/31, ¶¶ 13-17 (Jan. 15, 2026), <https://documents.un.org/doc/undoc/gen/n25/370/35/pdf/n2537035.pdf>; BINUH, Visit of the Designated Expert on the Situation of Human Rights in Haiti Mr. William G. O’Neill, Mar. 16, 2026, <https://binuh.unmissions.org/en/press-releases/visit-designated-expert-situation-human-rights-haiti-mr-william-g-oneill>.

² BINUH, *Report of the Secretary-General*, *supra* note 1, ¶14; Int’l Org. Migration, *Haiti’s Displacement Crisis Hits Record 1.5 Million Amid Escalating Violence* (June 5, 2026), <https://www.iom.int/news/haitis-displacement-crisis-hits-record-15-million-amid-escalating-violence> (citing IOM report and noting displacement has entered a new phase characterized by people fleeing areas previously considered safe).

³ See *Id.*; Haiti Humanitarian Country Team, *Humanitarian Needs and Response Plan* (Dec. 2025), https://www.unocha.org/at-tachments/9fa04d0c-17c9-4fea-b6fd-5f0719234ab4/HTI_HNRP2026_ExecutiveSummary_EN_20251218.pdf.

⁴ U.N. Panel of Experts, U.N. Doc. S/2023/674, ¶ 87, <https://docs.un.org/en/S/2023/674> (2023); see also Inter-Am. Ct. H.R. (ser. A), Advisory Opinion No. OC-30/25, ¶¶44-45 (Dec. 2025).

⁵ See David C. Adams & Frances Robles, *Haiti Doesn't Make Guns. So How Are Gangs Awash in Them?*, N.Y. Times (Mar. 30, 2025), <https://www.nytimes.com/2025/03/30/us/haiti-gangs-guns-smuggling.html>.

⁶ United Nations Office on Drugs and Crime (UNODC), *Haiti: Criminal Markets — Mapping Trends in Firearms and Drug Trafficking* (2023), https://www.unodc.org/documents/data-and-analysis/toc/Haiti_assessment_UNODC.pdf (citing Commission Nationale de Desarmement, Demantelement et de Reinsertion (CNDDR), *Strategie Nationale de Desarmement, Demantelement et de Reinsertion et de Reduction de la Violence Communautaire* (SNDDR-RVC) en Haiti, 2021- 2024).

⁷ U.N. Panel of Experts, *supra* note 4, ¶196; Rep. of the U.N. Office on Drugs and Crime pursuant to paragraph 9 of Security Council resolution 2692 (2023), U.N. Doc. S/2024/79 (Jan. 15, 2024), https://documents.un.org/symbol-explorer?s=S/2024/79&i=S/2024/79_1233099.

⁸ U.N. Panel of Experts, *supra* note 4, at ¶199.

⁹ U.S. Gov't Accountability Off., GAO-25-107007, CARIBBEAN FIREARMS: AGENCIES HAVE ANTI-TRAFFICKING EFFORTS IN PLACE, BUT STATE AND OTHER U.S. AGENCIES COULD IMPROVE COORDINATION 8 (2024).

¹⁰ U.N. Panel of Experts, *supra* note 4, at ¶174 (reporting an increase in rifles, including rifles that take higher-caliber ammunition—among firearms submitted for tracing by the U.N. Panel of Experts over the course of its mandate.)

¹¹ *Id.*, at 95 (describing the nature of straw purchasing operations in the United States); U.N. Panel of Experts, Final Report of the Panel of Experts on Haiti submitted pursuant to resolution 2700 (2023), U.N. Doc. S/2024/704, ¶155 (Sept. 30, 2024), https://binuh.unmissions.org/sites/default/files/s-2024-704_panel_of_experts_report.pdf [hereinafter U.N. Panel of Experts 2024 Report].

¹² 18 U.S.C. §§ 922(a)(6) (felony to knowingly make a false statement to a licensed dealer to acquire a firearm, concealing who the actual buyer is).

¹³ In one notable case, the leader of 400 Mawozo – one of Haiti's largest gangs – was sentenced to 35 years in prison for conspiring with U.S.-based associates and a Florida-based pawn shop to source military style weapons destined for Haiti. See Transcript of Bench Trial at 317–19, *United States v. Germine et al.*, No. 21-699 (JDB), 2024 U.S. Dist. LEXIS 654 (D.D.C. Jan. 2, 2024); Press Release, U.S. Att'y's Office D.C., "King" of Violent Haitian Gang Pleads Guilty to Gun Smuggling and Money Laundering After Government's Case (Feb. 2, 2024), <https://www.atf.gov/news/pres s-releas es/%E2%80%9Cking%E2%80%9D-violent-haitian-gang-pleads-guilt-y-gun-smuggling-and-money-laundering-after>. In other cases, trafficking ring leaders have been prosecuted for recruiting straw-purchasers to buy firearms from licensed dealers and smuggling them to Haiti. See e.g., Press Release, U.S. Att'y's Office for the Middle Dist. of Fla., International Gun Trafficking Conspiracy Dismantled (Dec. 11, 2025), <https://www.justice.gov/usao-mdfl/pr/international-gun-trafficking-conspiracy-dismantled>. See also Press Release, U.S. Att'y's Office for the Middle Dist. of Fla., Former Police Officer Sentenced to Three Years in Federal Prison for Gun Trafficking Offense (Aug. 14, 2025), <https://www.justice.gov/usao-mdfl/pr/former-police-officer-sentenced-three-years-federal-prison-gun-trafficking-offense>; Press Release, U.S. Att'y's Office for the D.C., Smuggler of Firearms from Key West to Haiti Sentenced in D.C. to 30 Months in Prison (July 23, 2025), <https://www.justice.gov/usao-dc/pr/smuggler-firearms-key-west-haiti-sentenced-dc-30-months-prison>.

¹⁴ Stop U.S. Arms to Mexico, *ATF Trace Data: Caribbean*, Jan. 2025, https://stopusarmstomexico.org/wp-content/uploads/2025/01/ATF-Trace-Data-Caribbean_web.xlsx.

¹⁵ *Id.* Since only a portion of weapons are submitted for tracing, it is possible that other states are also contributing to trafficking flows.

¹⁶ Internal analysis comparing trace data available at *id.* with number of FFLs within each zip code as reflected in ATF, Federal Firearms Listings, <https://www.atf.gov/firearms/tools-and-services-firearms-industry/federal-firearms-listings>.

¹⁷ This is further supported by evidence presented in indictments and trials. See e.g. Transcript of Bench Trial, *United States v. Germine et al.*, No. 21-699 (JDB), 2024 U.S. Dist. LEXIS 654 (D.D.C. Jan. 2, 2024); Indictment, *United States v. Charles*, No., U.S. District Court for the Middle District of Florida (filed); Indictment, *United States v. Sune-Giron*, No., U.S. District Court for the Middle District of Florida (filed).

¹⁸ See Nick Suplina et al., *The Supply Side of Violence: How Gun Dealers Fuel Firearm Trafficking* (2025), <https://everytownresearch.org/report/how-gun-dealers-fuel-firearm-trafficking/> (analyzing the role of gun dealers in enabling trafficking amidst weak enforcement).

¹⁹ U.N. Panel of Experts, *supra* note 4, at 96-99.

²⁰ Jacqueline Charles & Jay Weaver, *New Tactics, Routes Arm Haitian Gangs. Florida a Key to Illicit Flow of Guns and Ammo*, MIAMI HERALD (Mar. 20, 2025), <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article301845939.html#storylink=cpy>.

²¹ See e.g., IACtHR, *supra* note 4 (finding states parties (including the United States) have obligations to regulate and oversee the activities of arms dealers to prevent the diversion of weapons to illicit markets, and private companies have duties to adopt preventative measures to prevent their activities from negatively impacting human rights); see also Pablo Arrocha Olabuenaga, *Firearms Trafficking Comes to the Inter-American Court of Human Rights in Recent Advisory Opinion*, Just Security (Mar. 19, 2026), <https://www.justsecurity.org/133687/firearms-trafficking-iachr-advisory-opinion/> (discussing Inter-American Court's opinion).

²² S.C. Res. 2643, ¶¶ 11-14, U.N. Doc. S/RES/2643 (Oct. 21, 2022); S.C. Res. 2794, ¶ 2, U.N. Doc. S/RES/2794 (Oct. 17, 2025) (extending the expanded arms embargo through October 2026).

²³ 90 Fed. Reg. 29720 (July 7, 2025); 22 C.F.R. § 126.1(j) (2025).

²⁴ Bipartisan Safer Communities Act, 18 U.S.C. § 932 (2022) (penalizing straw purchasing when someone knowingly purchases a firearm on behalf, by request, or demand of another person he or she knows or should know will use it unlawfully); *id.* § 33 (penalizing arms-trafficking when one either transfers or receives a firearm through interstate or foreign commerce knowing or having reason to know that the firearm will be used unlawfully.)

²⁵ Gun Control Act, 18 U.S.C. § 923(a) (1968)

²⁶ See e.g., 18 U.S.C. § 922(t) (background check requirement); 18 U.S.C. § 923(g)(3)(A) (multiple sale reporting requirement); 27 C.F.R. § 478.124 (2025) (execution and retention of ATF Form 4473 for firearm transactions); *id.* § 478.126(a) (multiple sale reporting requirement of certain handguns).

²⁷ ATF, Don't Lie to the Other Guy, <https://www.atf.gov/firearms/tools-services-law-enforcement/atf-firearms-programs/dont-lie-other-guy> (last visited April 5, 2026).

²⁸ *Id.*

²⁹ See 18 U.S.C. § 922(a)(6) (false statements in connection with the acquisition of a firearm from a licensed dealer); *id.* § 923(g)(3)(A) (multiple-sale reporting requirement for licensees); *id.* § 924(a) (penalties for willful violations of this chapter, including §§ 922–923); *id.* § 932 (straw purchasing of firearms); *id.* § 933 (firearms trafficking); see also *id.* § 2 (aiding and abetting)..

³⁰ U.S. law makes it a federal crime to knowingly provide “material support of resources” to an entity designated as an FTO. See 18 U.S.C. § 2339B(a)(1) (2020) (criminalizing the knowing provision of material support or resources to a designated FTO); *id.* § 2339A(b)(1) (defining “material support or resources” to include, *inter alia*, “weapons,” “explosives,” and other tangible property).

³¹ For example, the Treasury Department’s Office of Foreign Asset Control has designated Johnson “Izo” Andre (leader of 5 Segond), Renel Destina (leader of Grand Ravine), Vitel’homme Innocent (leader of Kraze Barye) and Wilson Joseph (now convicted leader of 400 Mawozo), Jimmy Cherizier (leader of Viv Ansanm) and Victor Prophane (former member of Parliament sanctioned for, *inter alia*, trafficking weapons and arming criminal groups) as Specially Designated Nationals. U.S. persons, including federally licensed firearms dealers, are generally prohibited from providing goods or services to designated individuals, directly or indirectly, absent authorization. See, e.g., 31 C.F.R. § 594.201 (2025); 31 C.F.R. § 594.406 (2025); 31 C.F.R. pt. 501 app. A (2025). These sanctions obligations are in addition to, and may overlap with, firearms- and export-control regimes. See 18 U.S.C. §§ 922, 924 (2020); 22 U.S.C. § 2778 (2020); 22 C.F.R. pts. 120–130 (2025).

³² *Estados Unidos Mexicanos v. Diamondback Shooting Sports Inc.*, No. CV-22-00472-TUC-RM, 2024 U.S. Dist. LEXIS 52185 (D. Ariz. Mar. 22, 2024).

³³ *Id.* at 50.

³⁴ U.S. Gov’t Accountability Off., *supra* note 9, at 15.

³⁵ *Id.* at 6, 15.

³⁶ *Id.* at 18 (noting Haitian law enforcement has eTrace access but does not submit requests). This is despite the existence of a Memorandum of Understanding between the ATF and Haitian National Police to facilitate information sharing thorough the eTrace system. U.S. Dep’t State, U.S-Caribbean Cooperation to Stop Firearms Trafficking (2023), <https://2021-2025.state.gov/u-s-caribbean-cooperation-to-stop-firearms-trafficking-2/>

³⁷ U.S. Gov’t Accountability Off., *supra* note 9.

³⁸ *Id.* at 14.

³⁹ U.N. Panel of Experts 2024 Report, *supra* note 11.

⁴⁰ ARMAS Act of 2025, H.R. 6737, §5, 119th Cong. (2025), <https://www.congress.gov/bill/119th-congress/house-bill/6736/text>; ARMAS Act of 2025, S. 3508, §5, 119th Cong. (2025), <https://www.congress.gov/bill/119th-congress/senate-bill/3508/text>.

⁴¹ S.C. Res. 2793, at 3 (Sept. 30, 2025).

⁴² See United Nations, Letter dated 27 August 2025 from the Permanent Representative of Haiti to the United Nations addressed to the President of the Security Council, U.N. Doc. S/2025/537 (Aug. 27, 2025), [https://docs.un.org/en/S/RES/2793\(2025\)](https://docs.un.org/en/S/RES/2793(2025)) (announcing intent to establish the Standing Group and articulating its role).

⁴³ Press Release, U.S. Immigration & Customs Enforcement, Homeland Security Investigations and Haiti Ministry of Justice establish Transnational Criminal Investigative Unit (Feb. 14, 2024), <https://www.ice.gov/news/releases/homeland-security-investigations-and-haiti-ministry-justice-establish-transnational>.