## Statement for the Record of Mr. Shane Bennett, Principal Cyber Defense, Theft, Fraud, & Abuse

**Target Corporation** 

Before the House Committee on the Judiciary, Subcommittee on Crime and Federal Government Surveillance

# "Protecting Consumers and Businesses: Confronting Organized Retail Crime Hearing"

December 17, 2025



Chairman Biggs, Ranking Member McBath, and Esteemed Members of the Subcommittee:

Thank you for the opportunity to address the committee today on a very pressing issue: Protecting Consumers and Businesses: Confronting Organized Retail Crime (ORC). My name is Shane Bennett, and I have nearly 40 years of experience in Asset Protection and Fraud Prevention. Currently, I lead Retail Crime Strategy for Target Corporation's (Target) Fraud & Abuse team focused on large-scale ORC.

Target is one of America's largest retailers, with more than 400,000 team members supporting nearly 2,000 stores and 66 supply chain facilities nationwide. Over my career, including my time working in stores as an Asset Protection Specialist, in the field as an ORC Investigator, at headquarters as the Director of Field Investigations and my current role in Fraud & Abuse, I have witnessed firsthand how dangerous and highly coordinated ORC has become and the impact it has had on the retail industry.

ORC is far more advanced than your average shoplifting incident. These organized crime rings consist of both interstate and transnational actors who use sophisticated criminal networks to acquire merchandise through theft, deception, large-scale return fraud, barcode manipulation, and digital schemes. Once obtained—whether stolen or fraudulently—goods often move through coordinated pipelines that cross state lines and international borders.

No single state or retailer can see the full picture. ORC groups deliberately operate across jurisdictions to avoid detection. By using online marketplaces, international shipping routes, and digital laundering tools, these sophisticated crime rings exploit differences in legal jurisdictions to evade detection and prosecution, making it very difficult for state and local agencies to investigate their activities without the help of federal agencies.

The impact on both consumers and retailers is significant. ORC contributes to lower product availability on shelves, increases safety risks for both our team members and guests, disrupts supply chains, and fuels widespread financial fraud which could fund other criminal activities impacting our communities.

More recently, gift card scams have surged. The Department of Homeland Security estimates<sup>1</sup> more than \$1 billion in fraud losses over the past two years, and a 2022 AARP study<sup>2</sup> found that one out of every three Americans have either experienced gift card fraud themselves or know someone who has. This issue becomes even more urgent during the holiday season, when gift card purchases spike as people turn to them as easy, last-minute gifts.

https://www.wsj.com/tech/cybersecurity/url-scam-texts-china-gangs-68e96097?mod=hp\_lead\_pos9

<sup>&</sup>lt;sup>2</sup> https://www.aarp.org/money/scams-fraud/gift-card-fraud-survey-2022/

Although there are several fraud vectors involving gift cards targeting consumers and businesses, one example is gift-card tampering. Criminals steal inactive gift cards off retail shelves, tamper with the card by copying the activation data, then reseal them before putting them back on store shelves. Once an unsuspecting shopper loads money onto the card at checkout, fraudsters use automated systems or bots to detect a balance. Criminals then drain the funds by buying items, which are sold on the secondary market, online or overseas with the profits funding the criminal organizations.

At Target, we've built a multi-layered prevention model to combat this fraud. This includes real-time analytics, increased training and education for our frontline team members, and industry-leading innovations like our decoupled gift card technology, which prevents fraudulent activation and blocks criminals from monetizing stolen or fraudulently obtained goods – protecting our guests and your constituents. We also work closely with partners through the Gift Card Fraud Prevention Alliance, sharing data and identifying interstate trends.

Retailers cannot combat gift card fraud alone. Our partnerships with federal agencies are essential. For example, Target and other retailers partner with federal law enforcement through Project Red Hook, an initiative with Homeland Security Investigations (HSI). This collaboration traces illicit financial flows, identifies transnational fraud networks, and disrupts ORC operations that span multiple states. In the two years since implementation, 232 arrests have been made with asset seizures totaling approximately \$8 million.<sup>3</sup>

This federal partnership proves that combining retailer intelligence with federal capability can dismantle criminal groups—and the Combating Organized Retail Crime Act (CORCA) would strengthen and expand that model.

CORCA provides three essential tools.

First, aggregation authority. ORC networks intentionally keep individual incidents below state thresholds. CORCA allows federal prosecutors to aggregate theft and fraud across jurisdictions, revealing the true scale of these operations.

Second, modernized money-laundering statutes. Gift cards and digital value instruments are central to how ORC monetizes its activity. CORCA ensures these tools are properly covered under federal law, enabling law enforcement to pursue the financial backbone of these criminal enterprises.

Third, CORCA creates a federal Organized Retail and Supply Chain Crime Coordination Center within HSI. This coordination center will unify national intelligence, accelerate

<sup>&</sup>lt;sup>3</sup> Information provided by HSI Baton Rouge – Project Red Hook

investigations, improve coordination with retailers and supply chain partners, and—for the first time—provide visibility into both interstate and transnational ORC activity.

Retailers like Target have made substantial investments to protect our guests and secure our supply chain. But we cannot dismantle interstate and transnational theft- and fraud-driven networks on our own.

CORCA brings the federal partnership needed to protect consumers, strengthen supply chains, and disrupt sophisticated criminal enterprises operating across borders. Target, along with the entire retail community, strongly supports CORCA and urges Congress to pass this bipartisan legislation quickly.

Thank you for your leadership on this issue. I look forward to your questions.

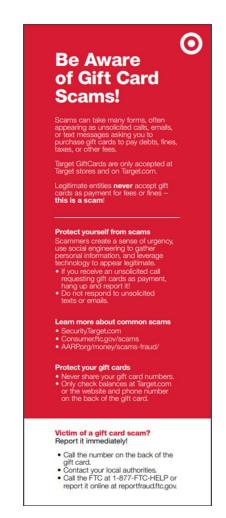
# **Target Materials on Gift Card Fraud Awareness**



## **Target Gift Card Scam Prevention Tips**

#### **Account Protection Tips**

- Do not purchase, sell or check your balance outside of Target.com.
- Only check your balance on the Target site at https://www.target.com/guest/gift-cardbalance.
- Do not purchase a gift card if it appears that the packaging has been altered or manipulated. If you have questions about a gift card, ask a Target team member for assistance.
- If you get a call from a stranger who says that a loved one is in trouble and they ask you to provide gift card numbers to help them, hang up and contact your loved one directly.



### Be Aware of Gift Card Scams

Never give gift card numbers over the phone or email.

Report suspected scarns to local authorities or the
Federal Trade Commission (FTC) at <a href="ftc.qov/complaint">ftc.qov/complaint</a>
or call toll-free: 1-877-FTC-HELP.

Do not purchase a gift card if it appears that the packaging has been altered or manipulated. If you have questions about a gift card, ask a Target team member for assistance.

Be aware of Gift Card Scams that could come from an unsolicited call, email or text that asks you to purchase gift cards to pay a debt, fine, taxes or another fee. Target GiftCards are only accepted at Target stores and on <u>Target.com</u>.

When checking your gift card balance, only follow the instructions listed on the gift card, packaging, or terms and conditions.

Target has the right to prosecute individuals that steal gift cards, gift card information, and/or conduct gift card scams against our guests.

Please Note: Terms and conditions apply to gift cards.
Gift Cards and Prepaid Cards cannot be returned or
redeemed for cash and credit except where
required by law. For more information,
visit security.target.com.

# Redesigned Target Gift Cards

### **Back of GiftCard**



### **Security Access Label**



