

December 2023



Slow Progress: U.S. Global Magnitsky Sanctions in their Sixth Year



This report provides a one-year update on how the U.S. government has used its Global Magnitsky sanctions program since Human Rights First and its partners published *Multilateral Magnitsky Sanctions at Five Years* in November 2022.

Key Recommendations

- **Use Global Magnitsky sanctions more robustly, in response to civil society recommendations:** This year, for unclear reasons, the U.S. government imposed significantly fewer Global Magnitsky sanctions than in previous years. Few of these sanctions appear to have been based on recommendations from civil society organizations. While U.S. government officials have stated civil society recommendations continue to be important, it should demonstrate their value by imposing sanctions based on them. If relevant departments are failing to reach consensus on specific sanctions, the White House should help resolve disagreements with a strong bias toward acting on credible recommendations.
- **Improve the geographic diversity of the tool, and target abusive state actors in partner countries:** Global Magnitsky sanctions over the past year predominantly focused on Latin America, Europe and Eurasia, and East Asia and the Pacific, with little to no attention paid to Sub-Saharan Africa, the Middle East and North Africa, and South and Central Asia. The U.S. government should use these sanctions tools against state actors implicated in human rights abuses or corruption, even when they are in partner countries.
- **Provide accountability for marginalized victims:** As noted in last year's report, there continues to be little explicit recognition through sanctions of certain marginalized and vulnerable victim groups such as women, children, LGBTQIA+ persons, Indigenous persons, and persons with disabilities. Sanctions should focus on abuses against these groups to provide a measure of accountability and recognition that they are often denied.
- **Build on progress in recognizing other forms of serious human rights abuse:** Significant progress was made this year in using Global Magnitsky sanctions in new contexts, such as human trafficking and the arbitrary detention of a single person. The U.S. government should build on these welcome precedents and continue to use this tool in response to other severe harms that have yet to receive attention.

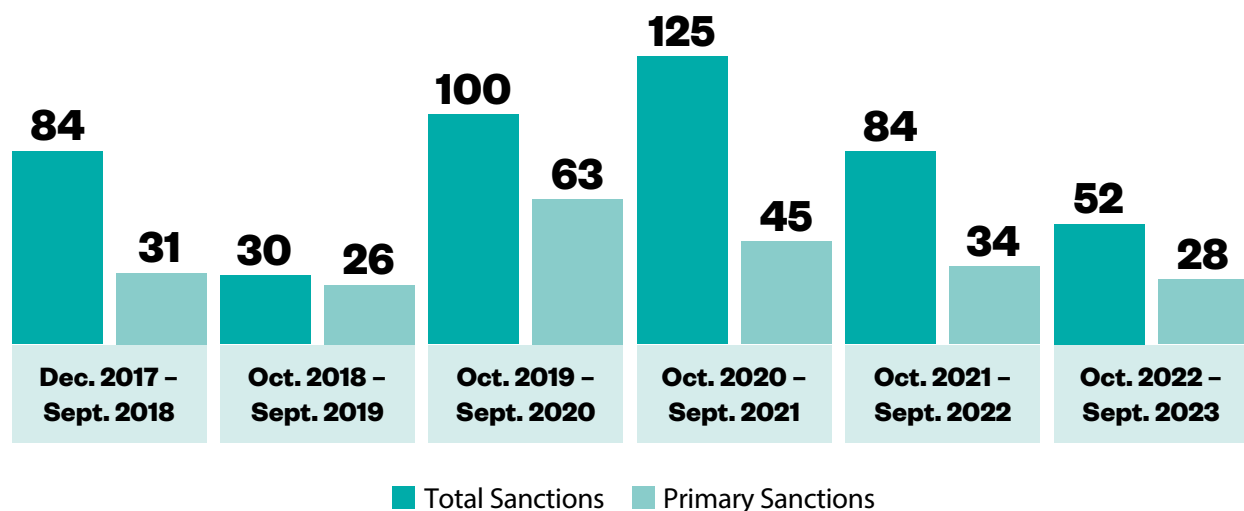
Global Magnitsky Sanctions at a Glance

One of the most surprising trends of the U.S. Global Magnitsky sanctions program over the past year has been the noticeable decline in its use. This year saw a 30 percent drop in the number of persons sanctioned for their direct involvement in human rights abuse or corruption, compared to the annual average in the first five years of

the program.¹ The drop was even steeper if the comparison also includes persons who were sanctioned solely for their ties to abusive or corrupt actors.

While such declines have occurred before, this year saw the lowest number of Global Magnitsky sanctions imposed in the past four years. The decline came despite a multi-year, ongoing effort by Congress and civil society to ensure the Treasury, State, and Justice Departments have additional appropriations and staff capacity to implement the Global Magnitsky program.²

Global Magnitsky Sanctions by Year³



The decline over the course of the Biden administration has been unexpected and perplexing. The administration's early, robust use of the tool resulted in tangible impact in many cases, such as the 2021 sanctions against

¹ This update covers sanctions imposed by the U.S. government under the Global Magnitsky sanctions program from October 2022 through the end of September 2023, in keeping with the time frame used in the *Multilateral Magnitsky Sanctions at Five Years* report. The 30 percent decline this year is based exclusively on a comparison of "primary" sanctions, and it does not include "derivative" sanctions, which are imposed against persons controlled or owned by a "primary" sanctions target. Of the 52 persons sanctioned in the report year, 28 were considered "primary" sanctions; in comparison, an average of 40 primary sanctions were imposed each year during the previous five years of the Global Magnitsky sanctions program. If the total number of Global Magnitsky sanctions (primary and derivative) is used as the basis for comparison, this year's decline is even greater; this year, there was a nearly 40 percent decline in all Global Magnitsky sanctions, from an average of 85 sanctions per year during the first five years of the program to just 52 over the past year. For more information about primary and derivative sanctions and the report's methodology, see *Multilateral Magnitsky Sanctions at Five Years* at 53.

² From October 2018 to September 2019, the U.S. government only imposed 30 Global Magnitsky sanctions. The following year, civil society organizations sought and Congress provided additional funds specifically appropriated to support the implementation of the Global Magnitsky program at the Treasury, State, and Justice Departments. <https://humanrightsfirst.org/library/human-rights-democracy-and-anti-corruption-groups-call-on-congress-to-support-global-magnitsky/>; <https://freedomhouse.org/article/us-senate-appropriations-subcommittee-financial-services-and-general-government-urged>; <https://cpj.org/2020/05/cpj-joins-letters-calling-on-us-senate-to-increase>; <https://freedomhouse.org/article/freedom-house-urges-congress-reauthorize-and-fund-global-magnitsky-sanctions-end-year>.

³ **Total sanctions** include all primary and derivative sanctions imposed under the Global Magnitsky program. **Primary sanctions** include persons whom the U.S. government stated had engaged in or supported the sanctionable conduct in some way. Derivative sanctions include persons who were connected to a primary sanctioned actor, but it was unclear if they had engaged in or supported the sanctionable conduct.

Bangladesh's Rapid Action Battalion⁴ and 2022 sanctions against Liberian officials for corruption.⁵ Many of these early cases had a basis in civil society recommendations.⁶

While civil society groups have continued to provide compelling detailed evidence of sanctionable human rights abuses and corruption to the Treasury and State Departments, Human Rights First is aware of only one case in the past year where such evidence appeared to serve as the basis for Global Magnitsky sanctions.

Officials at the State and Treasury Departments who spoke with Human Rights First acknowledged the overall decline but stressed that civil society recommendations are seriously considered and remain an invaluable source of information. While numbers of designations are not the only or even most important metric to consider when evaluating the use of Global Magnitsky sanctions, it is clear the Biden administration has passed up important opportunities to use this tool to its greatest effect.

Human Rights and Corruption Cases

This year, the use of the Global Magnitsky program was relatively balanced between human rights and corruption cases, with 21 sanctions for human rights abuses and 31 for corruption. This is largely due to a decrease in the breadth of sanctions being imposed on corrupt networks, with fewer entities sanctioned for their links to corrupt actors. No sanctions were imposed this year on the grounds that the person was involved in both human rights and corruption abuses.

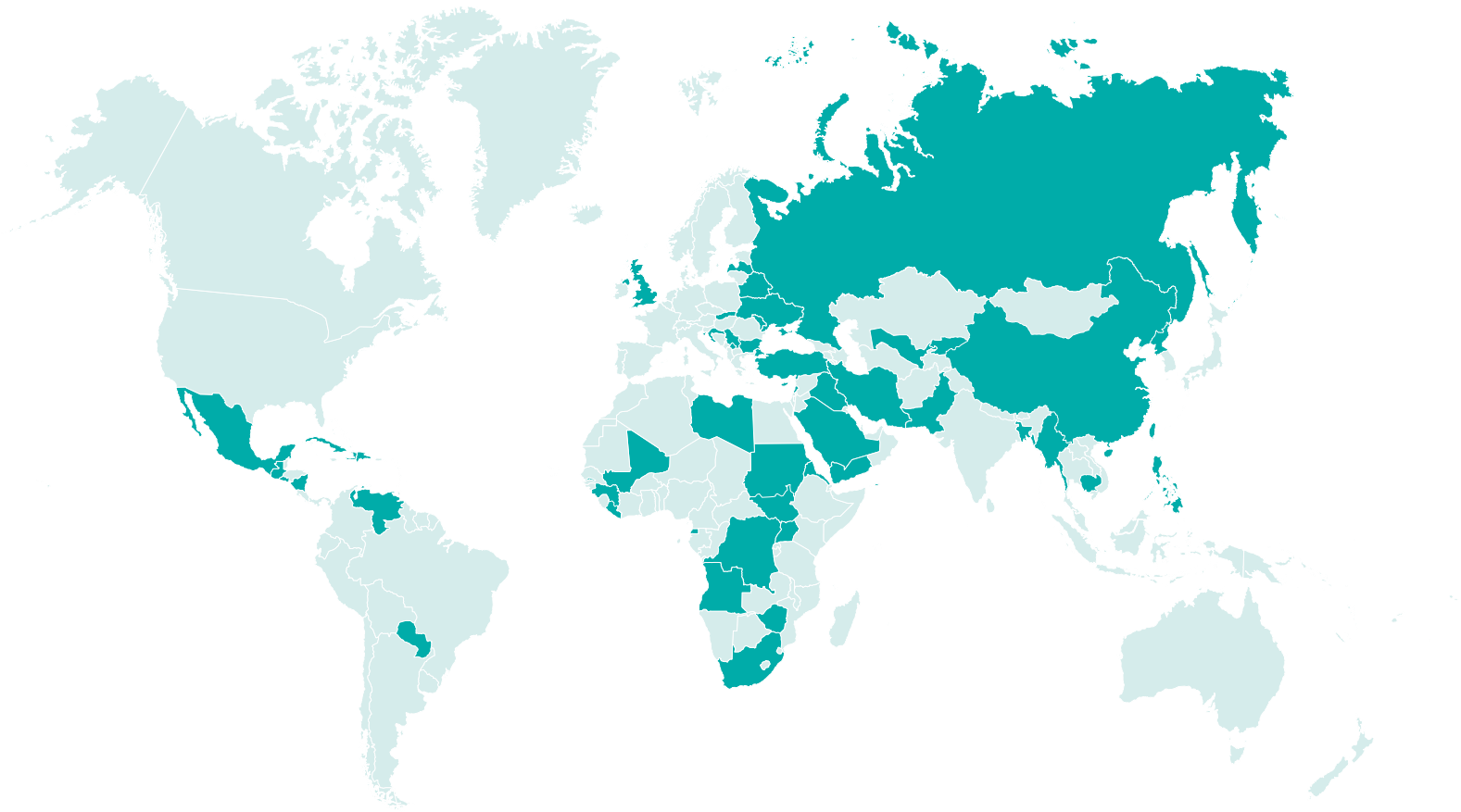
4 See <https://redress.org/wp-content/uploads/2023/11/Evaluating-Targeted-Sanctions.pdf>.

5 <https://www.voaafrica.com/a/liberian-officials-resign-facing-charges/6744131.html>.

6 <https://humanrightsfirst.org/library/united-states-announces-targeted-sanctions-human-rights-first-calls-on-other-nations-to-act/>

Sanctions with Global Reach

Over the past year, the United States imposed Global Magnitsky sanctions in 12 countries. In many cases, these countries were ones on which the United States had previously focused Global Magnitsky sanctions, such as Bulgaria, China, El Salvador, Guatemala, Haiti, Paraguay, and Russia. This year marked the first time that perpetrators connected to Guinea, Iran, Mali, Moldova, and the Philippines were targeted under this specific program.⁷

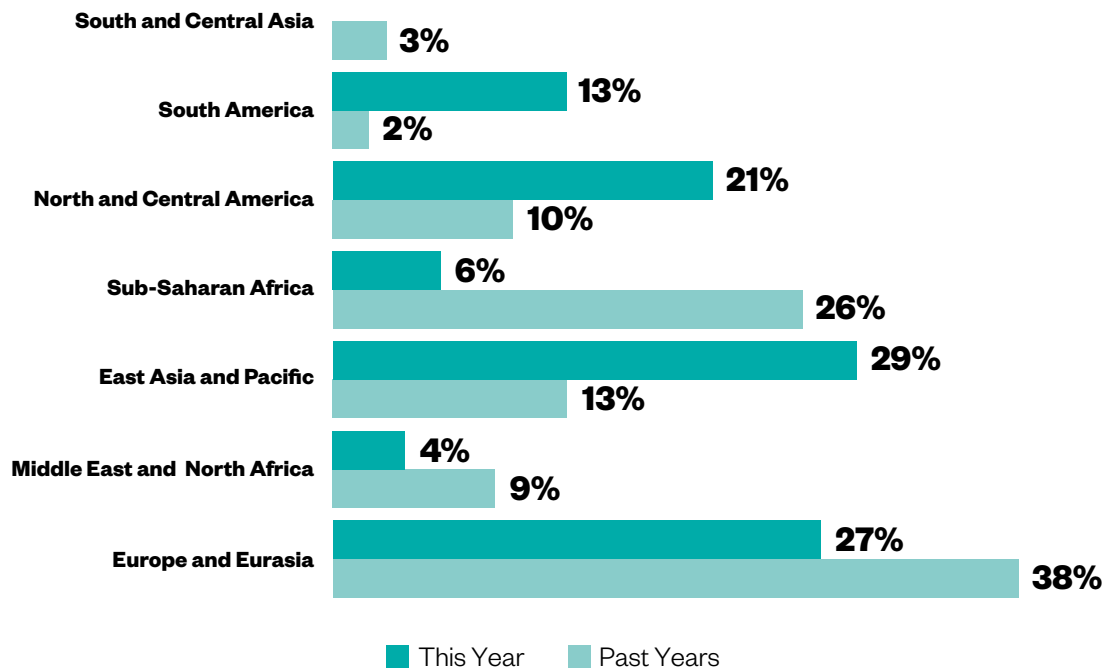


Regional Spread of Sanctions

This year saw significant shifts in the regional focus of the Global Magnitsky sanctions program. Compared to previous years, greater attention was paid to the East Asia and Pacific, North and Central America and the Caribbean, and South America regions. Much of this change was due to the influence of one or two large sets of sanctions, such as those imposed against persons involved in forced labor on China-registered fishing vessels, which made up 80 percent of the Global Magnitsky sanctions in the East Asia and Pacific region over the past year.

⁷ Most of the U.S. government's other sanctions in Iran, for example, have been imposed under Iran-specific sanctions programs.

Regional Spread of Global Magnitsky Sanctions⁸



Several regions saw persistent lack of attention from Global Magnitsky sanctions, such as South and Central Asia, where there were no designations over the past year, and the Middle East and North Africa region, which declined to just 4 percent of overall cases. While the Sub-Saharan Africa region has frequently seen extensive Global Magnitsky sanctions, this year it saw a 77 percent drop in comparison to the average of previous years.⁹

Among human rights cases over the past year, more than 70 percent focused on abuses in East Asia and the Pacific, largely due to the set of cases targeting forced labor in the illegal fishing industry. Three other regions – Europe and Eurasia, Middle East and North Africa, and Sub-Saharan Africa – each had single sets of cases ranging from one to three persons sanctioned. There were no Global Magnitsky human rights cases in the Western Hemisphere regions or in South and Central Asia.

Among corruption sanctions over the past year, about one-third focused on Europe and Eurasia, dominated by the 10 sanctions imposed for corruption in Bulgaria. Another third focused on several cases in the Northern Triangle and the Caribbean – in Guatemala, El Salvador, and Haiti. South America saw just one set of sanctions; these were against senior political leaders in Paraguay and made up nearly a quarter of all corruption sanctions. The only Global Magnitsky corruption sanction in Sub-Saharan Africa was against the former president of Mali's son. No Global Magnitsky sanctions were imposed for corruption in South and Central Asia, East Asia and the Pacific, or the Middle East and North Africa.

⁸ This data is based on all 52 Global Magnitsky sanctions imposed during the year, including both "primary" and "derivative" sanctions. For more on the Methodology, see https://humanrightsfirst.org/wp-content/uploads/2022/11/Multilateral-Magnitsky-Sanctions-at-Five-Years_November-2022.pdf at 53.

⁹ Some commentators criticized even these limited Africa-focused sanctions, suggesting the focus on ousted former officials dodged difficult diplomacy with certain sitting governments that engage in abuses and had come to power by force. See https://twitter.com/_hudson/status/1601253114794762240.

Sanctions Targeting Less Repressive and Allied Countries

While Global Magnitsky sanctions have most often been imposed in countries that fail to respect political rights and civil liberties and that are considered “Not Free” in Freedom House’s annual *Freedom in the World* report, this year there was a noticeable shift toward action against more abusive actors in countries considered “Free” or “Partly Free.”

Sanctions targeting actors in “Free” countries more than doubled, from 8 percent to 18 percent, and sanctions targeting those in “Partly Free” countries increased by approximately one-third, from 29 percent to 39 percent. These numbers are attributable to a handful of cases in Bulgaria, El Salvador, Guatemala, Moldova, Paraguay, and the Philippines, some of which may have been aimed at challenging abuse and corruption to discourage democratic backsliding.

Similarly, more Global Magnitsky sanctions were directed at actors in countries considered U.S. allies than in prior years. Last year’s report identified the general lack of sanctions targeting actors in allied and close partner countries as a shortcoming of the Global Magnitsky program, and recommended the United States impose sanctions without fear or favor, as part of a broader effort to address abuses.¹⁰ Over the past year, 21 percent of sanctions were tied to perpetrators in an allied country, compared to just 5 percent in previous years.¹¹ However, this change was solely due to the larger set of Bulgaria corruption cases and the sanctions against Apollo Quiboloy for sex trafficking in the Philippines.

Part of this shift may reflect an interest in using sanctions where they could have an impact on the abusive behaviors, and a recognition that such outcomes may be more likely in countries that are not already deeply repressive and/or where good diplomatic relations could be leveraged to encourage positive change. Despite these welcome sanctions, the United States has continued to shy away from sanctioning officials tied to widespread patterns of abuses or corruption in several close partner countries such as Egypt, Equatorial Guinea, India, Mexico, and the Philippines, where Human Rights First recommended that sanctions be imposed last year in its *Friends Like These* report.¹²

Human Rights Abusers and Corrupt Actors Facing Sanctions

Several notable differences emerged this year in terms of the roles and identities of those sanctioned under Global Magnitsky. Many of these reflect changes in the number and type of targets in corruption cases. For example, more individuals were sanctioned overall than companies or other entities, largely due to fewer affiliated entities being sanctioned alongside corrupt individuals. A higher share of this year’s Global Magnitsky sanctions focused on state actors compared to previous years, driven by the nearly exclusive focus (88 percent) of this year’s corruption sanctions on state actors. However, among all targets, nearly 60 percent continue to be nonstate actors.

¹⁰ https://humanrightsfirst.org/wp-content/uploads/2022/11/Multilateral-Magnitsky-Sanctions-at-Five-Years_November-2022.pdf, page 8.

¹¹ Countries that the United States considers “allies” include NATO member states and those designated as a “Major Non-NATO Ally.” See <https://www.state.gov/major-non-nato-ally-status/>.

¹² https://humanrightsfirst.org/wp-content/uploads/2022/12/Friends-Like-These_US-Security-Partners-and-Selectivity-in-the-Global-Magnitsky-Sanctions-Program-FINAL.pdf

Roles of the Perpetrators

This year saw a greater focus on politicians, with more than three times as many targeted, making up one-third of all Global Magnitsky sanctions this year. There was a slight decline in the number of companies that were sanctioned, as this year's corruption cases did not include many derivative or affiliated entities, unlike actions in previous years that targeted larger corruption networks. In a departure from past years, no sanctions were imposed this year on individuals with roles in the military, security, or intelligence sectors, nor anyone belonging to a militia or armed non-state group.

For the first time, this year the United States sanctioned a judge and a prosecutor for their roles in serious human rights abuses under the Global Magnitsky program, in the case involving Russian opposition leader Vladimir Kara-Murza. Only two other judges and one prosecutor had previously been sanctioned for corruption under the program.

Seniority of Perpetrators

This year's cases targeted a greater share of senior-level officials than in past years, including two former presidents in Paraguay and Guinea, the sitting vice president of Paraguay, government ministers, and congressional leaders. Almost no low-level officials were targeted this year.

Sanctions for the Detention of Vladimir Kara-Murza

In April 2022, Russian opposition leader and leading advocate for Magnitsky sanctions laws Vladimir Kara-Murza was arrested in Moscow and arbitrarily detained on politically motivated criminal charges of spreading "false information" about the Russian military.

In March 2023, following the submission of a formal sanctions recommendation from Human Rights First,¹³ the U.S. government imposed Global Magnitsky sanctions against the judge who ordered Kara-Murza's pretrial detention, the prosecutor who opened the case against him and sought his pretrial detention, and an expert government witness whose testimony formed the basis of the pre-trial detention order.¹⁴

The U.S. government recognized that Kara-Murza's "pre-trial detention on charges based on his exercising the right to freedom of expression" was arbitrary, echoing internationally-recognized legal categories of arbitrary detention.¹⁵

¹³ <https://humanrightsfirst.org/library/human-rights-first-recommends-sanctions-for-vladimir-kara-murzas-detention-and-poisoning/>

¹⁴ <https://home.treasury.gov/news/press-releases/jy1320>

¹⁵ <https://www.ohchr.org/en/about-arbitrary-detention>

The State Department also imposed visa restrictions against the judge and prosecutor, and sanctioned three other Russian government officials tied to his case under a Russia sanctions program.¹⁶

This case set several new precedents in the Global Magnitsky sanctions program:

- It was the first time that a judge and a prosecutor were sanctioned for being responsible for, complicit in, or engaged in serious human rights abuses, and the first time that an expert witness was sanctioned for providing services in support of a serious human rights abuse.
- This was the first case to clearly establish the arbitrary detention of a single individual is sanctionable under the program, as his detention was “based on his exercising the right to freedom of expression.”¹⁷
- Thanks to the advocacy of Kara-Murza’s wife, Evgenia, and many civil society groups, all four leading Magnitsky jurisdictions including Canada,¹⁸ the UK,¹⁹ and the EU²⁰ imposed Magnitsky sanctions on individuals connected to this case. This marked a rare concerted effort by these four jurisdictions to use Magnitsky-style sanctions to advocate for the release of a single political prisoner.

Global Magnitsky Sanctions for Human Rights Abuses

While there were only 21 Global Magnitsky sanctions imposed for human rights abuses this year, the U.S. government set important new precedents in the types of abuses covered, though it continued to fall short in recognizing marginalized victims.

Types of Abuses Sanctioned

This year, the U.S. government set several significant new precedents in how it responds to human rights abuses using the Global Magnitsky sanctions program.

16 <https://www.state.gov/designating-russian-nationals-involved-in-serious-human-rights-abuses-against-vladimir-kara-murza/>

17 <https://home.treasury.gov/news/press-releases/jy1320>. The 2018 GloMag sanctions against senior Turkish officials referred to the unjust detention of Andrew Brunson, but the Treasury Department was less clear in its statement whether his detention was the legal basis for the sanctions. <https://home.treasury.gov/news/press-releases/sm453>.

18 https://www.international.gc.ca/world-monde/international_relations-relations_internationales/sanctions/russia-russie.aspx?lang=eng

19 <https://www.gov.uk/government/news/uk-sanctions-fsb-agents-and-russian-investigators-behind-arrest-of-british-russian-national-vladimir-kara-murza>; <https://www.gov.uk/government/news/uk-sanctions-key-figures-involved-in-deplorable-sentencing-of-dual-british-national-vladimir-kara-murza-after-appeal-is-rejected>.

20 <https://www.consilium.europa.eu/en/press/press-releases/2023/06/05/human-rights-violations-in-russia-eu-lists-individuals-responsible-for-vladimir-kara-murza-s-sentencing-and-degrading-treatment/>; <https://www.consilium.europa.eu/en/press/press-releases/2023/07/20/human-rights-violations-eu-lists-18-individuals-and-five-entities-responsible-for-gender-based-violence-and-linked-to-the-navalny-and-kara-murza-cases/>

For the first time, human trafficking was recognized as a sanctionable abuse under the Global Magnitsky program.²¹ In two cases, the U.S. government focused on forced labor and sex trafficking as the central abuses that were sanctioned:

Forced labor abuses in the illegal fishing industry: In a landmark case, the U.S. government sanctioned two businessmen, 10 affiliated companies, and 157 China-flagged vessels connected to forced labor abuses in the illegal, unreported, and unregulated fishing industry.²² The U.S. Treasury Department cited the companies for being engaged in various types of abuses, which in totality amounted to forced labor, including:

- Deaths of workers and physical violence
- Abusive working and living conditions resulting in malnutrition
- Extreme isolation for extended periods at sea
- Withheld wages
- Excessive overtime work
- Deceptive recruiting practices
- Retention of identity documents
- Debt bondage

The case achieved several other notable firsts for the Global Magnitsky program:

- It was the first time the U.S. government used the program to target an entity listed on the NASDAQ stock exchange.
- It was the first time vessels were sanctioned under the program.
- It was the largest number of targets in a Global Magnitsky sanctions action to date.

Sex trafficking in the Philippines: In a second precedent-setting case, the U.S. government sanctioned Apollo Carreon Quiboloy, a federally-indicted Filipino pastor, for sex trafficking young women and girls as young as 11 years old, rape, and other forms of physical abuse.²³ It was the first case that focused on rape and sex trafficking as the central abuses sanctioned under the Global Magnitsky program.²⁴

21 In 2017, the U.S. government sanctioned Mukhtar Hamid Shah, a Pakistani surgeon, for his involvement in "kidnapping, wrongful confinement, and the removal of and trafficking of human organs" under the Global Magnitsky program. <https://home.treasury.gov/news/press-releases/sm0243>. However, until December 2022, the U.S. government had not imposed Global Magnitsky sanctions directly in response to human trafficking, i.e., forced labor and/or sex trafficking. See <https://www.state.gov/what-is-trafficking-in-persons/>.

22 <https://home.treasury.gov/news/press-releases/jy1154>

23 <https://home.treasury.gov/news/press-releases/jy1155>

24 <https://humanrightsfirst.org/library/human-rights-first-welcomes-new-u-s-sanctions-targeting-human-rights-abuses-and-corruption/>

Human Rights First and its partners have long advocated for the U.S. government to recognize human trafficking as a sanctionable “serious human rights abuse,” and welcomed this important step for its victims.²⁵

In another case, targeting a Chinese official in the Tibetan Autonomous Region (TAR), the U.S. government listed for the first time “forced sterilization” and “coerced abortion,” among other abuses, as part of the grounds for Global Magnitsky sanctions.²⁶ As discussed above, the past year also saw the first time that a single case of arbitrary detention served as the primary basis for Global Magnitsky sanctions in the Vladimir Kara-Murza case.

The TAR and Kara-Murza cases made explicit references to abuses that impacted the rights to freedom of religion and expression, respectively.²⁷ These were the first time the U.S. government has *specifically stated* violations of these rights were part of the grounds for Global Magnitsky sanctions, although they were not the first time that the United States imposed such sanctions for conduct that violated those rights. While the U.S. government does not regularly invoke international human rights standards when it announces Global Magnitsky sanctions in human rights cases, doing so can help situate its foreign policy actions within a credible universal framework.

Marginalized and Vulnerable Victims

One of the major findings of last year’s report was that the U.S. government has rarely – if ever – recognized certain marginalized victim groups when it announces Global Magnitsky sanctions for human rights abuses. In its press releases detailing the abuses that prompted sanctions, victims who are women, children, LGBTQIA+ persons, Indigenous persons, and persons with disabilities have rarely been mentioned.

This year, the sanctions against Apollo Quiboloy marked only the third Global Magnitsky case where the majority or all victims were identified as women or girls.²⁸ It was also the first case that was heavily centered on abuses against children, specifically girls.

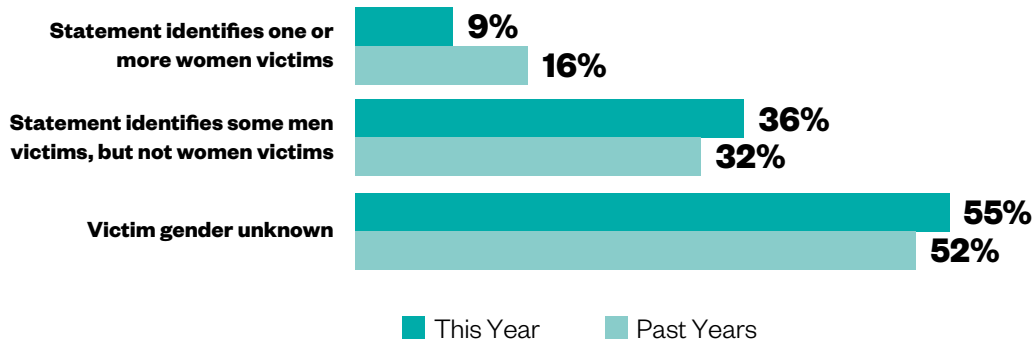
Overall, however, this year’s human rights cases under Global Magnitsky represented a further decline in representation of marginalized victim groups. Women continued to be grossly underrepresented compared to men, with four times more sanctions mentioning male victims than female victims. Even in situations where women or other marginalized persons have been victims, the U.S. government has missed opportunities to highlight them in its statements.

25 <https://humanrightsfirst.org/library/human-rights-groups-urge-the-u-s-government-to-sanction-for-human-trafficking-abuses/>; <https://humanrightsfirst.org/library/human-rights-first-welcomes-new-u-s-sanctions-targeting-human-rights-abuses-and-corruption/>

26 <https://home.treasury.gov/news/press-releases/jy1155>

27 <https://home.treasury.gov/news/press-releases/jy1155>; <https://home.treasury.gov/news/press-releases/jy1320>.

28 See Gao Yan, <https://home.treasury.gov/news/press-releases/sm0243>; Sultan Zabin and Abdul Hakim al-Khaiwani, <https://home.treasury.gov/news/press-releases/sm1208>; Apollo Carreon Quiboloy, <https://home.treasury.gov/news/press-releases/jy1155>



Throughout the entire year, no victims were identified as LGBTQIA+ persons, Indigenous persons, or persons with disabilities, continuing a longstanding pattern of underrepresentation of these groups. There has only been one Global Magnitsky case that focused on abuses against LGBTQIA+ persons,²⁹ and no cases that have focused on abuses against Indigenous persons or persons with disabilities.

Why Recognizing Victims Matters: Sanctions for Abuses Against Women in Iran

The United States should recognize victims, particularly those from marginalized groups, in its public statements that announce sanctions for human rights abuses. As these abuses are often part of efforts to further marginalize and dehumanize these victims, sanctions can provide a form of public accountability that acknowledges the specific harms done and reaffirms the dignity of victims.

In December 2022, months after Jina Mahsa Amini was killed in Tehran for wearing a headscarf “improperly,” the U.S. government sanctioned Ali Akbar Javidan, a commander of the Law Enforcement Forces of the Islamic Republic of Iran in Kermanshah province, more than 300 miles from Tehran. While the U.S. government mentioned Amini’s death in its sanctions announcement, it only cited Javidan’s forces in Kermanshah for “kill[ing] **protesters**, including **children** and the **elderly**” and Javidan’s commitment to “punish so-called moral crimes, including the alleged improper wearing of the hijab, during a July 2022 roundup of 1700 **people**.”³⁰ Nowhere did the U.S. government specifically acknowledge that women were the key targets of this repression, nor their leading role in the protests.

This erasure is especially glaring when compared to the EU’s statement a month later when it sanctioned Javidan for the same abuses. The EU centered its statement on his actions targeting women, specifically citing his role in “the active repression of **women** who do not comply with headscarf codes,” “the LEF’s arrests of **women** during July 2022 protests,” and “violence, discrimination, cruel and degrading behavior, and arbitrary detention of **women**.”³¹

29 <https://home.treasury.gov/news/press-releases/sm1208>

30 Emphasis added. <https://home.treasury.gov/news/press-releases/jy1155>

31 Emphasis added. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32023D0153>

In the midst of ongoing countrywide, women-led protests for women's rights under the slogan, "Woman. Life. Freedom." sparked by the killing of Mahsa Amini, it is inexplicable why the United States would fail to directly acknowledge the women of Kermanshah in its statement condemning Javidan's abuses, and instead only obliquely allude to women through the "hijab" that he sought to use as a means to control them.

In a protest held in Kermanshah days after Mahsa Amini's killing and in the midst of a deadly government crackdown, a 62-year-old mother Minoo Majidi was shot with 167 pellets and killed by Iranian security forces. Her last words to her family as she left to protest were, "If I don't go out and protest, who else will?"³² Women and other marginalized victims deserve to be recognized for their courage in standing up to repression and for the ways in which they are uniquely targeted and denied fundamental human rights.

Global Magnitsky Sanctions for Corruption

This year, there were 31 Global Magnitsky designations for corruption in 8 sets of cases, targeting corruption schemes with ties to Moldova, Russia, Belarus, Bulgaria, Guatemala, El Salvador, Paraguay, Haiti, and Mali.

The vast majority of this year's corruption sanctions – 88 percent – involved allegations of bribery. Corruption related to government contracts and to the extraction of natural resources were the second and third most frequently cited types of corruption that prompted sanctions, at 41 percent and 35 percent respectively.³³

One notable trend in the U.S. government's corruption cases in the past year has been the significantly smaller size of the corruption networks targeted. In previous years, the U.S. government has often sanctioned a primary individual along with individuals connected to that person and entities owned or controlled by them. For example, corruption sanctions cases targeting Israeli businessman Dan Gertler and Bulgarian oligarch Vassil Kroumov Bojkov included dozens of entities they owned or controlled.

This kind of network approach to sanctions reflected an effort by the U.S. government to identify and isolate entire corrupt schemes, with the average network targeted including 7 individuals or entities. This past year, the average size of networks in corruption cases was just two individuals or entities. This figure could grow if the U.S. government continues to pursue these cases to identify and sanction additional individuals or entities connected to these networks.

³² <https://www.theguardian.com/global-development/2023/jul/24/theres-no-other-option-but-to-fight-iranian-women-defiant-as-morality-police-return>

³³ Persons can be sanctioned for involvement in more than one type of corruption.

U.S. Global Magnitsky Sanctions from October 2022 through September 2023

A total of 52 individuals or entities were sanctioned by the U.S. government in 14 unique actions under the Global Magnitsky sanctions program from October 1, 2022 through September 30, 2023.

1. A former Member of **Moldova's** Parliament for corruption (October 2022)
2. A Russian national, a Belarusian national, and three affiliated companies for corruption in **Guatemala** (November 2022)
3. Two chairmen and ten affiliated companies for serious human rights abuses on **China**-flagged ships, along with 157 vessels (December 2022)
4. The Presidential Legal Secretary and Minister of Labor in **El Salvador** for corruption (December 2022)
5. The President of Congress, a congressman, and the former Minister of Energy and Mines in **Guatemala** for corruption (December 2022)
6. The former President of **Guinea** for serious human rights abuses (December 2022)
7. One commander of the Law Enforcement Forces of the **Islamic Republic of Iran** and a prison warden for serious human rights abuses (December 2022)
8. The son of the former President of **Mali** and an affiliated company for corruption (December 2022)
9. The founder of a Christian church for serious human rights abuses in the **Philippines** (December 2022)
10. A Party Secretary and public security official in the **Tibetan Autonomous Region** for serious human rights abuses (December 2022)
11. The former President and the Vice President of **Paraguay** and five affiliated companies for corruption (January 2023, March 2023)
12. Five current or former government officials and five affiliate entities for corruption in **Bulgaria** (February 2023)
13. A judge, a special investigator, and a government witness for serious human rights abuse in **Russia** (March 2023)
14. The former President of the **Haitian** Chamber of Deputies for corruption (April 2023)

