

U.S. GLOBAL MAGNITSKY AND RELATED SANCTIONS

Mid-Year Update

January 1, 2024 – June 30, 2024

Notable developments and patterns of use

No Sign of Reversing Decline in Use of Global Magnitsky Sanctions: In [November 2023](#), Human Rights First reported a slowdown in the use of Global Magnitsky sanctions by the U.S. government over the 2023 U.S. fiscal year. The trend also carried across the 2022 and 2023 calendar years, with totals for both years being among the lowest ever for the Global Magnitsky program in terms of primary sanctions targets.¹ In the first half of 2024, the slow pace of new targets continued with only nine persons newly designated under the program; an additional 12 persons that had previously been sanctioned were also transitioned to the Global Magnitsky sanctions list in connection with the closure of the Zimbabwe-related sanctions program. This trend may yet be reversed in 2024 if the U.S. government continues its practice of saving most of its Global Magnitsky announcements for December, however, this practice diminishes the potential for greater attention and impact resulting from more timely and spaced-out announcements. Overall, the continuing slowdown suggests the Biden administration is not using this tool to its greatest effect and failing to show results for congressional appropriations intended to support more robust use of Global Magnitsky sanctions.

West Bank Sanctions: While the U.S. government often establishes country-specific sanctions programs for situations involving adversarial countries, the new [West Bank sanctions program](#) has largely targeted violence committed by Israeli citizens. Between the announcement of the program on February 1, 2024, and the end of the reporting period, there have been five rounds of designations, as described below. Several of these designations have been [multilateralized](#) with similar sanctions responses from the UK, Canada, and the EU. These sanctions build on a previous Section 212(a)(3)(C) visa restriction policy to address abuses in the West Bank and have been actively used. The extensive and fairly rapid rate at which these sanctions have been multilateralized marks a significant policy alignment among major sanctioning jurisdictions.

Reduced Focus on Human Rights Abuses: In the first six months of 2024, both the Global Magnitsky sanctions program and Section 7031(c) visa restriction program have rarely been used to address human rights abuses. Across both programs, less than one-third of the known designations have targeted human rights violators. Only 1 of the 21 Global Magnitsky designations in the first half of the year was a new addition to the U.S. sanctions list for human rights abuses. This disparity between corruption and human

¹ Primary targets include persons sanctioned because they engaged in or supported the sanctionable conduct in some way. This excludes derivative targets, which include entities and individuals that are connected to a primary sanctioned actor, but that may not have been involved in the sanctionable conduct, such as entities owned or controlled by a primary sanctioned actor. Only considering primary targets can eliminate outlier cases where dozens of derivative targets are sanctioned, which may give a false impression of how extensively the program is being used.

rights-focused cases should be addressed to ensure that these tools are being used to their greatest effect to hold human rights abusers and corrupt actors equally accountable.

New Global Magnitsky Precedent: Targeting a Sitting Head of State: In March, the President of Zimbabwe, Emmerson Mnangagwa, became the first sitting head of state to be designated under the Global Magnitsky sanctions program. This designation followed the U.S. government's decision in March to revoke its existing Zimbabwe-related sanctions authority. President Mnangagwa and 11 others previously listed under the Zimbabwe-related program were redesignated under the Global Magnitsky program to ensure they remained subject to U.S. sanctions. The U.S. government rarely sanctions a sitting head of state, and this move is not expected to mark a new departure from the U.S. government's general practice.

Security Partners: Except for using the West Bank sanctions authority against Israeli perpetrators, the U.S. government in this reporting period refrained from sanctioning persons tied to abuses or corruption in countries considered U.S. allies or security partners. This continues a general, though not complete, trend of selectivity in how Global Magnitsky and related sanctions are implemented, despite numerous recommendations from civil society in recent years providing credible information of sanctionable conduct by officials in such countries as discussed in our [Friends Like These](#) report.

A New Focus on Journalists?: Marking World Press Freedom Day on May 3, 2024, President Biden issued a [statement](#) in which he promised in the coming weeks to take "executive action in response to the global crackdown on press freedom" and that he would "declare this crackdown on press freedom a grave threat to national security and will authorize measures, including sanctions and visa bans, against those who take abusive actions to silence the press." While the statement suggested the possible development of a new sanction or visa restriction program centered on press freedom or designations on this issue under existing programs, neither has occurred to date.

New human rights and anticorruption sanctions designations

Global Magnitsky Sanctions Program (E.O. 13818)

During the first half of the year, only 21 individuals or entities were designated across three countries under the Global Magnitsky program. Only nine of these were new designations, with the remaining 12 having previously been designated under another U.S. sanctions program that was being terminated. If current patterns continue, by the end of 2024, the U.S. government will have its lowest annual rate of imposing Global Magnitsky sanctions since the program's start amid the context of a broader slowdown in sanctions under the program. While the U.S. government typically saves a large number of sanctions to announce in December, doing so reduces the potential impact of more timely sanctions.

The 21 designations as of June 2024 primarily focused on corruption cases, with 14 designations for corruption, six for serious human rights abuse, and one for both.



- **Guatemala:** In January, the former Minister of Energy and Mining, [Alberto Pimentel Mata](#), was sanctioned for engaging in numerous corruption schemes related to government contracts and licenses, including bribery.
- **Zimbabwe:** Following the termination of the U.S. government's Zimbabwe-related sanctions program in March, 12 persons who had been designated under those programs were [newly designated](#) under the Global Magnitsky program, along with two individuals who had not previously been designated. Of the 14 persons designated, six were for serious human rights abuse, seven were for corruption, and one was for both. The designations included the first sitting head of state to be targeted under the Global Magnitsky program, President Emmerson Mnangagwa, as well as First Lady Auxillia Mnangagwa, the current Vice President and Defense Minister, other security officials, and a corrupt business network.
- **Guyana:** In June, [members of one of Guyana's wealthiest families](#), Nazar and Azruddin Mohamed, and their company, Mohamed's Enterprise, were sanctioned for tax fraud and bribery in their gold export operations. Guyanese official Mae Thomas was sanctioned for corruption related to the Mohameds' gold export tax fraud. Two other companies owned by Azruddin were also designated.

Section 7031(c) visa restrictions

Since January, the State Department has publicly designated just 38 foreign officials under its Section 7031(c) visa restriction program, putting it on track to have the fewest public designations in a calendar year since the first such public designation in 2018. The new designations spanned six countries, and most were focused on corruption, with 26 designations for significant corruption and 12 for gross violations of human rights. The number of confidential designations made under this program is unknown.

- **Guatemala:** Three days after leaving office in January, former president [Alejandro Eduardo Giammattei Falla](#) was designated for accepting bribes in exchange for the performance of his public function.
- **North Macedonia and Kosovo:** In March, [three officials in the Western Balkans](#) were designated for significant corruption, including North Macedonia's former Special Chief Prosecutor and former mayor of Karpos, and the former mayor of Kacanik, Kosovo.
- **Suriname:** In April, the former [President of Suriname and six former military officials](#) were designated for gross violations of human rights during the "December Murders" of 1982. These killings, occurring 42 years ago, are the oldest human rights violations targeted under this program.
- **Malawi:** In April, [four former public officials](#) were designated for accepting bribes and other articles of value from a private businessperson in exchange for awarding a government procurement contract for the Malawi Police Service.



- **Bangladesh:** In May, [former Chief of Army Staff Aziz Ahmed](#) was designated for corruptly interfering in public processes while helping his brother evade accountability for criminal activity in Bangladesh, ensuring the improper awarding of military contracts, and accepting bribes in exchange for government appointments.
- **Uganda:** In May, [five current and former government officials](#) were designated. Four were designated for conduct that misused public resources and diverted materials from Uganda's neediest communities. Former Deputy Chief of the Ugandan Peoples' Defense Forces (UPDF) Peter Elwelu was designated for his involvement in extrajudicial killings by the UPDF. Three of the officials' spouses were also designated.

Section 212(a)(3)(C) visa restriction policies

The State Department announced the following new visa restriction policies under Section 212(a)(3)(C) of the Immigration and Nationality Act related to human rights abuses, corruption, or undermining democracy:

- **Commercial spyware:** In February, the State Department announced a visa restriction [policy](#) targeting individuals involved in or deriving benefit from the misuse of commercial spyware to target journalists, activists, perceived dissidents, marginalized or vulnerable groups, and their family members. [Follow-up action](#) was taken under that policy against 13 individuals in April.
- **Undermining Georgian democracy:** In May, the State Department announced a visa restriction [policy](#) for persons involved in undermining democracy in Georgia. [Follow-up action](#) was taken under that policy against two to three dozen Georgians in June.

The State Department announced six follow-up actions under previously announced Section 212(a)(3)(C) policies related to human rights abuses, corruption, or undermining democracy:

- **Russia:** In February, [follow-up action](#) was taken under a policy targeting five "Russia-installed purported officials, including one immediate family member" involved in human rights abuses of Ukrainian children.
- **Khashoggi Ban:** Two follow-up announcements were made under the "Khashoggi Ban," which targets transnational repression. These include: (i) action targeting multiple [South Sudanese officials](#) responsible for the kidnappings of activists abroad in February, and (ii) action targeting multiple [Hong Kong officials](#) for cracking down on the rights and freedoms of pro-democracy activists living outside Hong Kong in March.



- **South Sudan:** In March, multiple individuals were designated in a [follow-up action](#) for “undermining or impeding a sustainable peace by engaging in corruption that fuels the conflict in South Sudan.”
- **Syria:** In March, [follow-up action](#) was taken against 10 government officials and members of their immediate families involved in serious human rights abuses, under a Syria-specific policy.
- **Uganda:** At the same time it announced Section 7031(c) visa restrictions in May, the State Department also took [follow-up action](#) against multiple other Ugandan officials under a Section 212(a)(3)(C) policy for undermining democratic processes and repressing members of marginalized or vulnerable populations in Uganda, such as “political opposition groups, civil society organizers and vulnerable communities.”

The State Department has yet to take public follow-up actions under certain previously announced Section 212(a)(3)(C) policies, such as a [2021 policy](#) on the crisis in the Anglophone regions of Cameroon and the 2023 [Fallon Smart Policy](#) for foreign government officials who have assisted fugitives in evading the U.S. justice system.

Human rights and anticorruption sanctions under country-specific programs

Aside from the Global Magnitsky sanctions detailed above, the Treasury and State Departments also imposed targeted sanctions under six country-specific and thematic sanctions programs against individuals and entities for their engagement in human rights abuses or corruption. This list does not include designations made on grounds other than involvement in human rights abuses or corruption.

- **Iran (E.O. 13553)** – In January, a [network of individuals](#) led by Iranian narcotics trafficker Naji Ibrahim Sharifi-Zindashti was sanctioned for numerous acts of transnational repression including assassinations and kidnappings in an attempt to silence perceived critics of the Iranian regime. This action was jointly taken with the United Kingdom.
- **Russia (E.O. 14024)** – Three relevant actions were taken under this program:
 - Six Russian prison officials were designated in connection with the death of opposition politician and anticorruption activist Alexey Navalny, in two separate announcements in [February](#) and [May](#).
 - In February, seven officials were [designated](#) for involvement in the forcible transfer and/or deportation of Ukrainian children to camps promoting indoctrination in Russia, Belarus, and Russia-occupied Crimea.
 - In a separate action in June, five individuals and an entity were [designated](#) for forced deportation, transfer, re-education, and militarization of Ukrainian



children from Russia-occupied areas of Ukraine on behalf of the Government of the Russian Federation.

- **Nicaragua (E.O. 13851)** – Two actions were taken under this program:
 - In March, the [Attorney General of Nicaragua](#) was designated for “enabling the Ortega-Murillo regime to steal real property formerly belonging to independent media outlets, international organizations, and political prisoners.”
 - In May, the [Training Center of the Russian Ministry of Internal Affairs in Managua](#) was designated for materially assisting the Nicaragua National Police, “which has enabled the regime’s brutal repressive tactics.”
- **Hostage-taking program (E.O. 14078)** – In April, several [leaders of Jama’at Nusrat al-Islam wal-Muslimin \(JNIM\) and al-Murabitoun](#) were designated for involvement in hostage-taking activities in Mali and Burkina Faso.
- **Sudan (E.O. 14098)** – In May, [two Rapid Support Forces \(RSF\) leaders](#) were designated for leading the RSF’s war campaign in Darfur.
- **Specially Designated Global Terrorist (SDGT) program (E.O. 13224)** – In June, [the Nordic Resistance Movement and three of its leaders](#) were designated for violent activity based on its openly racist, anti-immigrant, antisemitic, anti-LGBTQI+ platform.

New sanctions authority focused on the West Bank

On February 1, 2024, President Biden issued [E.O. 14115](#), which created a broad new sanctions program to target foreign persons involved in acts that threaten the peace, security, or stability of the West Bank as well as certain types of violent or threatening acts and property destruction or seizure in the West Bank. This followed a December 2023 [announcement](#) by the State Department that it was implementing a new Section 212(a)(3)(C) visa ban policy targeting individuals undermining peace, security, or stability in the West Bank. As of June 30, the U.S. government has designated the following persons on the grounds described under the new sanctions program:

- On the day the Executive Order was issued, four Israeli settlers were [sanctioned](#) under the program for involvement in assaulting and killing Palestinian and Bedouin civilians and Israeli activists, among other acts.
- In March, three Israeli individuals and two entities were [designated](#) for being involved in various acts of violence against Palestinian civilians and Israeli human rights defenders in the West Bank.



- In April, the [founder and leader of Lehava](#), an organization engaged in destabilizing violence affecting the West Bank, was designated for involvement in acts or threats of violence against Palestinians. Concurrently, the Treasury Department also designated two entities involved in fundraising campaigns on behalf of sanctioned persons.
- In June, [Lions' Den](#), a militant Palestinian group, was designated for acts of violence in the West Bank.
- In a second action in June, [Tzav 9](#), a violent extremist Israeli group, was designated for blocking, harassing, and damaging convoys carrying lifesaving humanitarian assistance to Palestinian civilians in Gaza.

Delisting: Global Magnitsky Authority

There was one delisting under the Global Magnitsky authority. In March, [Angel Rondon Rijo](#), a Dominican businessman who was [designated](#) in December 2017 for allegedly facilitating corporate bribes to Dominican officials, was taken off the sanctions list. No official reasons have been provided for the delisting, although it appeared Rondon had sought the delisting through administrative procedures.

Legal update

Two former Afghan officials—Hafi Ajmal Rahmani, Mir Rahman Rahmani, and their associated entities designated for corruption under the Global Magnitsky program in December 2023—sought a preliminary injunction against their designations in the U.S. District Court for the District of Columbia. Their motion for preliminary injunction was [denied](#) by the Court on April 19, 2024.

In June, the Supreme Court of the United States [overruled](#) a 40-year administrative law precedent known as the Chevron doctrine in its ruling in the consolidated cases *Loper Bright Enterprises v. Raimondo* and *Relentless, Inc v. Department of Commerce*. Under the Chevron doctrine, courts had previously granted deference to federal agencies' reasonable interpretation of ambiguous Congressional statutes. Now, however, courts are expected to exercise independent judgment in interpreting whether agencies have acted within their statutory authority and are no longer required to defer to federal agencies' interpretations. While the impact of this decision on U.S. sanctions law remains unclear, it is [expected](#) to result in increased challenges to sanctions decisions made by the Treasury Department's Office of Foreign Assets Control in implementing Global Magnitsky and other sanctions under the International Emergency Economic Powers Act (IEEPA).



New resources from Human Rights First

- **[Section 7031\(c\) explainer](#)**: This brief explainer covers the U.S. State Department's Section 7031(c) visa restriction program, which is used to target current and former government officials and their family members for involvement in significant corruption and gross violations of human rights.
- **[Iran sanctions explainer](#)**: This brief explainer summarizes the various U.S. sanctions programs that have been used to target human rights abuses and corruption in Iran.
- **[West Bank sanctions explainer](#)**: This brief explainer highlights key aspects of the U.S. government's newest sanctions authority, Executive Order 14115, to target those engaged in certain violent, intimidating, or destabilizing actions in the West Bank.
- **[West Bank sanctions tracker](#)**: Human Rights First has published and regularly updates a tracker of targeted sanctions related to the West Bank, covering designations by the United States, UK, EU, Canada, and Australia.
- **[Section 212\(a\)\(3\)\(C\) tracker](#)**: Human Rights First has published and regularly updates its tracker of new policies and follow-up actions under the U.S. State Department's Section 212(a)(3)(C) visa restriction program. It covers actions taken under both the Trump and Biden administrations.
- **[Global Magnitsky Act's Congressional trigger explainer](#)**: This brief explainer provides background on the implementation of Section 1263(d) of the Global Magnitsky Act, which requires the administration to respond to certain bipartisan requests from Congress to determine whether specific alleged perpetrators qualify for sanctions.

Access all of Human Rights First's U.S. targeted human rights and anticorruption sanctions and visa restrictions resources [here](#).



About the Targeted Human Rights and Anticorruption Sanctions Coalition

Human Rights First works with partners to coordinate a coalition of more than 330 civil society organizations around the world that advocate for the effective use of targeted human rights and anticorruption sanctions as a tool to promote accountability. The coalition provides training, resources, and assistance to civil society groups to help them prepare well-documented recommendations to the United States, Canada, UK, EU, and Australia identifying perpetrators eligible for human rights and/or corruption sanctions. Since 2017, the coalition has provided more than 200 sanctions recommendations to these jurisdictions, in addition to other forms of engagement and advocacy on sanctions targets.

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Mission statement

Human Rights First works to create a just world in which every person's intrinsic human rights are respected and protected, to build societies that value and invest in all their people. To reach that goal demands assisting victims of injustice, bringing perpetrators of abuse to justice, and building institutions that ensure universal rights.

Human Rights First is a nonprofit, nonpartisan international human rights organization based in Los Angeles, New York, and Washington D.C

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