

U.S. GLOBAL MAGNITSKY AND RELATED SANCTIONS

Mid-Year Update

January 1, 2025 – June 30, 2025

This briefing provides an overview of recent developments in the U.S. government's use of its targeted human rights and anticorruption sanctions programs from January 1, 2025 to June 30, 2025.

Notable developments and patterns of use

Dubious Delisting Under the Global Magnitsky Program: A senior leader of Hungarian Prime Minister Viktor Orbán's cabinet, Antal Rogán, was [sanctioned](#) under the Global Magnitsky program in January in the final days of the Biden administration, for allegedly orchestrating corruption schemes that enriched himself and loyalists by manipulating public contracts and resources. Following a public lobbying campaign by the Hungarian government, the Trump administration lifted the sanctions against him in April, with Secretary of State Rubio [commenting](#) without explanation that the sanctions were "inconsistent with U.S. foreign policy interests." This marked the first time an individual sanctioned under the Global Magnitsky program has been granted almost immediate relief without demonstrating any behavior change or facing some form of accountability.

International Criminal Court (ICC) Sanctions Undermine Accountability Efforts: In February, the Trump administration issued [Executive Order 14203](#) creating a new sanctions program focused on the ICC, in response to the court's scrutiny of alleged Israeli and U.S. involvement in war crimes within the ICC's jurisdiction. During the reporting period, the administration sanctioned the ICC's chief prosecutor [Karim Khan](#) and [four judges](#) for their roles in authorizing investigations into U.S. personnel in Afghanistan and the issuance of arrest warrants against Israeli Prime Minister Benjamin Netanyahu and former Defense Minister Yoav Gallant. In early July, Secretary Rubio also [announced](#) sanctions against UN Special Rapporteur Francesca Albanese on the basis of her advocacy for action by the ICC in its Palestine investigation. With the sanctions against the judges and UN Special Rapporteur Albanese, the administration has taken more aggressive action against the ICC than similar sanctions imposed against senior court officials in the first Trump administration and threatened accountability efforts more broadly. In May, Human Rights First filed a lawsuit and successfully secured a [license](#) from the Treasury Department to protect ICC trial attorney and U.S. Army veteran Eric Iverson from facing possible civil or criminal penalties for sanctions violations relating to his work on the court's Darfur investigation. See below for additional resources on the recent U.S. sanctions targeting the ICC.

West Bank Sanctions Termination: On his first day in office, President Trump terminated the West Bank sanctions program ([E.O. 14115](#)), lifting sanctions against all 33 of the individuals and entities that had been designated under the program. The sanctions program had been [created](#) in February 2024 in response to growing concern over Israeli settler violence against Palestinians in the West Bank in the wake of the October 7 attacks, and many of the sanctions were [multilateralized](#) by the UK, Canada, EU, Australia, and other countries. The status of the State Department's [2023 visa restriction policy](#) under Section 212(a)(3)(C) to similarly target individuals involved in undermining peace, security, or stability in the West Bank is unclear.

Rollback of Syria Sanctions: Following the fall of the Assad regime in Syria and marking a significant shift in U.S. policy, the Trump administration terminated the Syria sanctions

program through the issuance of [Executive Order 14312](#). The Treasury Department [removed](#) more than 500 persons from its sanctions list who had been designated under it, focusing on individuals and entities critical to Syria's development, government operations, and rebuilding. The administration left in place sanctions on Bashar al-Assad and his associates, human rights abusers, and others connected to captagon trafficking, proliferation activities, ISIS and Al-Qa'ida affiliates, and Iran and its proxies. Certain secondary sanctions done under the Caesar Syria Civilian Protection Act of 2019 have been temporarily waived, however, these cannot be formally terminated without congressional action. The Executive Order also established a pathway for the State Department to remove Syria from its State Sponsors of Terrorism list, among other actions.

Changing Human Rights and Anticorruption Sanctions Priorities under the Second Trump Administration: In addition to the concerning sanctions actions discussed above, the Trump administration has significantly scaled back efforts to prioritize human rights and anticorruption accountability in its foreign policy and sanctions. These have included broader structural changes, such as gutting the State Department's Bureau of Democracy, Human Rights, and Labor, one of the key bureaus implementing human rights sanctions and visa restrictions, and narrowing its focus to "natural rights" that excludes universally recognized human rights violations impacting women and LGBTQIA+ persons. In furtherance of its "[America First](#)" [foreign policy](#), the administration's sanctions and visa restriction priorities have focused primarily on transnational criminal organizations such as drug cartels and their trafficking operations, Iran and groups backed by the Iranian regime, those designated as foreign terrorist organizations, Cuba, and migration.

New human rights and anticorruption sanctions designations

Global Magnitsky Sanctions Program (E.O. 13818)

During the first half of the year, there was only one individual designated under the Global Magnitsky program. This action was taken in January in the final days of the Biden administration, and the individual was delisted by the Trump administration several months later.

- **Hungary:** In January, [senior Hungarian official and Minister in Charge of Prime Minister Orbán's Cabinet Office, Antal Rogán](#), was sanctioned for corruption. He reportedly distributed public contracts and resources to those loyal to him and the ruling Fidesz party, and orchestrated schemes to control and divert proceeds from several strategic sectors of the Hungarian economy.

However, in April, the Trump administration [lifted](#) sanctions on Rogán, following reports of a lobbying campaign by the Hungarian government. Human Rights First and Transparency International U.S. [issued](#) a statement condemning the action, which marked the first time an individual sanctioned under the Global Magnitsky program was granted almost immediate relief without demonstrating any behavior change or facing some form of accountability. The delisting was also [criticized](#) by Senators Shaheen and Warren, Ranking Members of the Senate Foreign Relations and Senate Banking, Housing and Urban Affairs Committees respectively, for "erod[ing] U.S. credibility on anti-corruption policy", failing to adhere to the statutory

congressional notice requirements, and not providing justification for the delisting that fits the criteria established by Congress.

Section 7031(c) visa restrictions

From January through June, the State Department publicly designated six foreign officials and their immediate family members under its Section 7031(c) visa restriction program. The new designations were limited to the Western Hemisphere region and focused on both significant corruption and gross human rights violations. The number of confidential designations that may have been made under this program during this time is unknown.

- **Argentina:** In March, [former President of Argentina Cristina Elisabet Fernández de Kirchner and former Minister of Planning of Argentina Julio Miguel De Vido](#) were designated for their involvement in significant corruption, including multiple bribery schemes involving public works contracts.
- **Cuba:** In May, [three Cuban judges and a prosecutor](#) were designated for their involvement in the prosecution, conviction, sentencing, and arbitrary detention of Luis Robles Elizástigui and other political prisoners.

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. The Department also used this authority in response to irregular or illegal migration and interference with U.S. repatriation flight operations.

- **China:** In March, the State Department announced a new visa restriction [policy](#) for current or former foreign government officials involved in the “forced return of Uyghurs or members of other ethnic or religious groups with protection concerns to China.” An unknown number of officials from the government of Thailand were designated for their role in the forced return of 40 Uyghurs from Thailand on February 27.¹
- **Censorship:** In May, the State Department announced a new visa restriction [policy](#) for foreign nationals “responsible for censorship of protected expression in the United States.” While the Department did not appear to designate anyone under the policy at the time of the announcement, recent reports suggested the Department could consider using this authority to target individuals in [Europe](#) and [Brazil](#).²

The State Department announced two follow-up actions under a previously announced Section 212(a)(3)(C) policy related to human rights abuses:

¹ For more on the incident that led to U.S. visa restrictions being imposed on Thai officials, see [Human Rights Watch](#).

² At the time of publication, the State Department had also [announced](#) visa restrictions against Brazilian Supreme Federal Court Justice Alexandre de Moraes, his “allies on the court,” and their immediate family members, acting under Section 212(a)(3)(C) of the Immigration and Nationality Act. By naming de Moraes, the Department violated [8 U.S.C. Section 1202\(f\)](#), which establishes that the issuance or refusal of visas shall be confidential.

- **Cuba:** In [February](#), the State Department expanded its 2019 policy targeting the labor exploitation of Cuban doctors to apply to current or former Cuban government officials and other individuals. Several individuals, including Venezuelans, were designated under the expanded policy.

In [June](#), the State Department announced another follow-up action under the same Cuba policy targeting several Central American government officials who were responsible for Cuban medical mission programs that included elements of forced labor and exploitation of Cuban workers. The visa restriction was also extended to the officials' immediate family members.

For all other State Department announcements made under the Section 212(a)(3)(C) visa restriction authority, please see Human Rights First's resources on [How Sanctions Have Been Implemented \(Trackers\)](#) [here](#).³

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 25 individuals and entities for their engagement in human rights abuses. This list does not include designations made on grounds other than involvement in human rights abuses or corruption.

- **Sudan (E.O. 14098)** – Two actions were taken under the Sudan program by the Biden administration:
 - In January, the [leader of the Rapid Support Forces \(RSF\), Mohammad Hamdan Daglo Mousa \(Hemedti\)](#), was sanctioned for war crimes and atrocities including ethnically motivated killings and sexual violence as a weapon of war in Darfur, Gezira, and other places.
 - Also in January, the [leader of the Sudanese Armed Forces \(SAF\), Abdel Fattah Al-Burhan](#), was sanctioned for refusing to participate in international peace talks, indiscriminate bombing of civilian infrastructure, attacks on schools, markets, and hospitals, and extrajudicial executions.
- **Venezuela (E.O. 13692, as amended)** – In early January, [five police and military officials](#) were sanctioned for being officials of the Government of Venezuela and involved in a number of human rights violations, including extrajudicial killings, killings of protesters, arbitrary arrests and detentions, and other repression tactics.

³During the report period, the State Department used a companion provision of Section 212(a)(3)(C) in the Immigration and Nationality Act that allows deportations on the ground that an alien's presence or activities would have "potentially serious adverse foreign policy consequences" in order to seek the removal of several lawful permanent residents and visa holders, based on their participation in protests related to Israeli conduct in Gaza. These removals have been challenged on constitutional and other grounds. See [Letter from Secretary Marco Rubio](#).

- **Democratic Republic of the Congo (E.O. 13413, as amended by E.O. 13671)** – In February, [Rwanda’s Minister of State for Regional Integration, James Kaberebe](#), was sanctioned for orchestrating the Rwandan Defense Forces’ support for the M23 armed group and violence that has killed thousands of civilians. In the same action, senior member of M23 and the Congo River Alliance, Lawrence Kanyuka Kingston, was sanctioned for his media and diplomatic outreach on behalf of M23. Two companies owned by Kanyuka were also designated.
- **Hostage-Taking (E.O. 14078)** – In March, [three Iranian officials with the Ministry of Intelligence and Security \(MOIS\)](#) were sanctioned for their involvement in the abduction, detention, and probable death of former FBI Special Agent Robert A. “Bob” Levinson.
- **Hong Kong (E.O. 13936)** – In March, [six Hong Kong officials](#) were sanctioned for their involvement in using Hong Kong’s National Security Laws to target individuals or for their role in developing, adopting, or implementing the National Security Law.
- **Burma (E.O. 14014 and E.O. 13581)** – In May, [the Karen National Army and its leader, Saw Chit Thu, along with two of his sons](#), were designated for their role in facilitating cyber scams that harm U.S. citizens, human trafficking, and cross-border smuggling. The designations were made under both the transnational criminal organizations sanctions program, and a Burma-specific sanctions program.

Legal update

In April, Human Rights First [joined](#) the American Civil Liberties Union and New York Civil Liberties Union in filing an [amicus brief](#) in support of Democracy for the Arab World Now’s (DAWN) efforts to block an individual sanctioned for violence in the Israeli-occupied West Bank from accessing information about DAWN’s advocacy for sanctions against him. The brief argues that the First Amendment and other protections bar the court from granting the discovery that the individual has requested in the case. It also emphasizes how such discovery requests, if granted, would put civil society groups at serious risk of irreparable harm and chill their vital advocacy work on human rights and corruption issues. The case was filed in federal court in the Eastern District of New York, and no ruling has been issued as of publication.

In May, Human Rights First [filed](#) a lawsuit against the Trump administration on behalf of International Criminal Court (ICC) trial attorney and U.S. Army veteran Eric Iverson, who currently leads a team investigating atrocities committed in Darfur since 2002. With U.S. sanctions against Iverson’s ultimate supervisor, Prosecutor Karim Khan, Iverson was at risk of criminal prosecution or steep financial penalties for his work, which could be seen as providing “services” to a sanctioned individual. Arguing that the sanctions unconstitutionally infringed on Iverson’s First Amendment rights, including his right to practice law in pursuit of justice and accountability, Human Rights First was able to secure a [license](#) from the U.S. Treasury Department for Iverson, resulting in withdrawal of the case.

New resources and media from Human Rights First

- [U.S. Global Magnitsky and Related Sanctions: End of Year Update July 1, 2024 – December 31, 2024](#): Human Rights First published a report tracking designations and trends in the Global Magnitsky, Section 7031(c), and other sanctions and visa restriction programs relating to human rights abuses and corruption in the second half of 2024.
- [Global Magnitsky and Related Sanctions Semi-Annual Update](#): Human Rights First contributed to a joint report with REDRESS, Open Society Foundations, Raoul Wallenberg Centre for Human Rights, and the Australian Centre for International Justice that highlights major updates in Magnitsky-style sanctions across the United States, UK, EU, Canada, and Australia from July 1, 2024 through December 31, 2024.
- [Human Rights First Calls for Magnitsky Sanctions in Egyptian Bribery of Senator Menendez](#): In January, Human Rights First submitted a Global Magnitsky sanctions recommendation to the U.S. government against a senior Egyptian official and U.S. company for their apparent involvement in the bribery of former U.S. Senator Robert Menendez.
- [What's Different About the New ICC Sanctions? Still Appalling, Not Much Narrower](#): In a blog, Human Rights First's Adam Keith and Nina Moraitou-Politz identify three key differences between the new executive order on International Criminal Court sanctions and a related House bill.
- [Questions and Answers: U.S. Sanctions on the International Criminal Court](#): Human Rights First published a factsheet explaining the ICC-related sanctions imposed by the Trump administration in February 2025.
- [Joint Letter to the UK Minister of State on Magnitsky-style Sanctions](#): Human Rights First and REDRESS called on the UK Foreign, Commonwealth and Development Office to increase its independent use of sanctions to credibly respond to human rights abuses and corruption.
- [Comparison Chart: Covered Human Rights Abuses & Corruption in Different Jurisdictions](#): Human Rights First published a chart comparing the types of conduct and persons eligible for Magnitsky-style sanctions under the U.S., UK, EU, Canadian, and Australian sanctions frameworks, along with an accompanying [blog](#).
- [The Leahy Laws and Their Relationship with Global Magnitsky Sanctions](#): Human Rights First published an explainer on the U.S. Leahy Laws, which restrict security assistance to foreign security forces implicated in gross violations of human rights, and their connection with Global Magnitsky sanctions, along with an accompanying [blog](#).

- [Human Rights First Joins ACLU and NYCLU in Amicus Brief to Protect First Amendment Rights and Interests of NGOs Advocating for U.S. Sanctions](#) – In an amicus brief filed in U.S. federal court in support of an NGO facing a discovery request related to its sanctions advocacy, Human Rights First, the ACLU, and NYCLU argued that granting such discovery requests would put civil society groups at serious risk of irreparable harm, chill their human rights and anticorruption work, and violate the First Amendment and other protections.

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

Human Rights First works with partners to coordinate a coalition of more than 340 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 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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