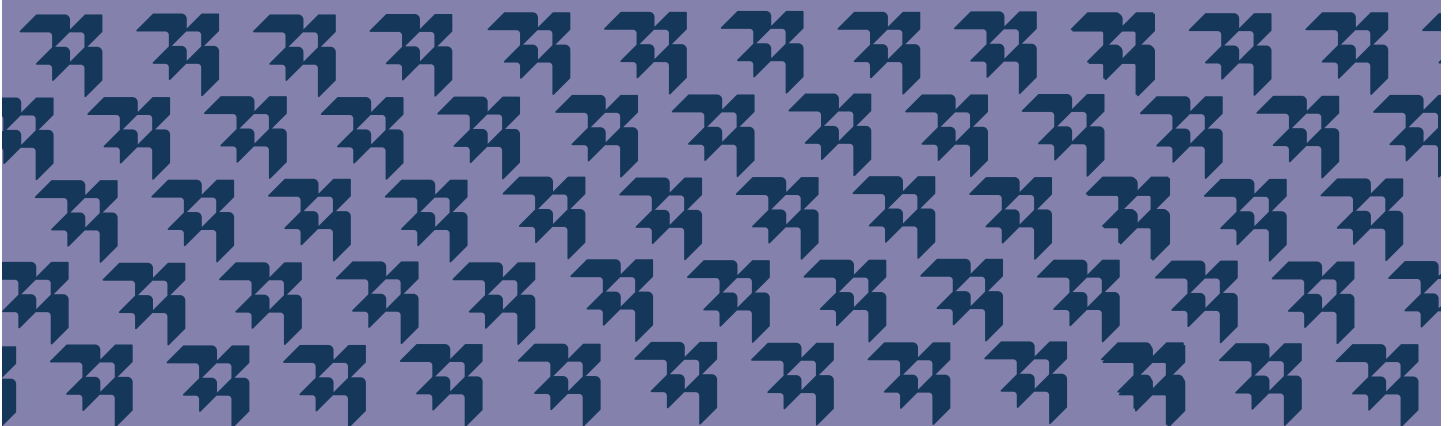


U.S. Global Magnitsky Sanctions



JANUARY 2026

The best-known of the United States government's (USG) targeted sanctions tools to address human rights abuse and corruption is the Global Magnitsky (GloMag) sanctions program. Although inspired by and named for Russian whistleblower Sergei Magnitsky, the program has worldwide applicability. Its flexible criteria and mandate for consultation with civil society have made it an attractive tool for NGOs recommending sanctions. However, the USG often defaults to using country-specific sanctions programs for human rights abuses and corruption instead of GloMag, when such a program exists.

History

Congress passed the [original Magnitsky Act](#) in 2012 in response to the death in custody of Russian tax advisor Sergei Magnitsky, who had uncovered a major tax fraud conspiracy. The Magnitsky Act authorized U.S. sanctions against Russians involved in Magnitsky's brutal detention and the conspiracy he uncovered, as well as people involved in human rights abuses against other activists.

The Global Magnitsky Human Rights Accountability Act was passed in 2016. The executive branch implemented the law in 2017 by issuing Executive Order ([E.O. 13818](#)), which created a sanctions program covering a broad range of human rights abuses and acts of corruption anywhere in the world. In 2022, the Act was permanently reauthorized.

Legal Criteria

These sanctions can be imposed on foreign individuals and entities¹ anywhere in the world that are responsible for or involved in:

Serious human rights abuse

- The term “serious human rights abuse” is not defined in law or regulation.² In practice, the USG has used GloMag in response to human rights abuses involving at least one incident of physical violence against one or more victims, or a serious deprivation of liberty.
- Specifically, GloMag has most frequently been applied in response to killings, torture, and unlawful or arbitrary detentions.
- GloMag sanctions have also been applied in response to gender-based violence, enforced disappearance, certain acts of human trafficking, and more.

¹ For more information on instances where U.S. persons can also be subject to sanctions under Global Magnitsky, see our [FAQs](#).

² For the full language of this criterion, see E.O. 13818, section 1(a)(ii)(A).

Corruption

- Corruption is not defined under E.O. 13818, but U.S. practice demonstrates the corruption must involve an improper exchange or provision of a benefit involving government actors or entities.
- The E.O. provides illustrative examples of corruption such as misappropriation of state assets and bribery.³ The program has also covered government procurement, money laundering, and state capture, among other forms of corruption.
- Transferring the proceeds of corrupt acts is also sanctionable, even years after the original acts.

Other bases for sanctions include being leaders or officials of entities that have engaged in sanctionable acts; attempting such acts; or assisting perpetrators.⁴ Generally, the USG imposes these sanctions only in response to acts occurring in the last five years.⁵

Process and Implementation

Penalties: These sanctions impose an entry ban and asset freeze and are publicly announced. Sanctioned persons generally cannot obtain or keep a U.S. visa or access U.S.-based funds or property. Persons under U.S. jurisdiction cannot transact with them.

Implementing agencies: The Treasury Department has the authority to impose these sanctions, and doing so is purely discretionary. Treasury must consult with the State and Justice Departments.

Congressional oversight and involvement: Certain requests from members of Congress can require the executive branch to consider and report on a particular sanctions recommendation.

- When the chair and ranking member of certain congressional committees ask, the President must determine if a specific person has engaged in a sanctionable activity and report whether he or she intends to impose sanctions, within 120 days.⁶
- Separately, the chair and ranking member of certain committees can also provide information that the President must consider in deciding whether to impose sanctions.⁷

³ See E.O. 13818, section 1(a)(ii)(B).

⁴ See E.O. 13818, section 1(a)(ii)(C) and (D), 1(a)(iii).

⁵ For more information on the relevant evidentiary threshold, see our [FAQs](#).

⁶ For more on Congress' record of invoking this provision of the Global Magnitsky Act to prompt USG action, see our April 2024 [explainer](#), "The Congressional Trigger for U.S. Global Magnitsky Sanctions: Section 1263(d)."

⁷ See Global Magnitsky Act, section 1263(c) and (d).

The President must report annually to Congress on newly imposed and terminated sanctions under the program, as well as efforts to encourage other governments to impose similar sanctions.⁸

NGO involvement: Unusually, the President is required by law to consider “credible information obtained by...nongovernmental organizations that monitor violations of human rights” in implementing this program. The Treasury and State Departments accept and consider recommendation files from NGOs and historically have consulted with NGOs that submit such information. Since 2017, roughly one-third of the USG’s sanctions under this program have had a basis in recommendations submitted by [the civil society network that HRF coordinates](#).

Lifting sanctions: Under the Global Magnitsky Act, the President may terminate sanctions against an individual or entity if one of several conditions is met: if that person was wrongly accused of the sanctionable acts; has been “prosecuted appropriately” for their conduct or “has credibly demonstrated a significant change in behavior”; or if lifting the sanctions is “in the national security interests of the United States.”⁹ In general, the lifting of GloMag sanctions has been rare, though the second Trump administration in 2025 delisted Hungarian official [Antal Rogan](#) and former Paraguayan President [Horacio Cartes](#). It did so [without making](#) the required congressional notification, and its public comments about the actions made only vague reference to U.S. foreign policy interests.

Patterns of Use

Numbers and Type of Abuse: As of January 6, 2026, 608 individuals and entities from 55 countries have been designated under the GloMag program.¹⁰

- 406 designations have been imposed for corruption only.
- 186 designations have been imposed for serious human rights abuses only.
- 16 designations have been imposed for both.

The greater number of corruption actions is largely due to the USG’s practice of targeting multiple companies in a corrupt network.

⁸ For recent examples, see the [2024 Year End Update](#).

⁹ See Global Magnitsky Act, section 1263(g).

¹⁰ All figures provided are current as of January 6, 2026. See our [sanctions trackers](#) for additional details.

Regional coverage: The USG has imposed GloMag sanctions on persons in all regions of the world. Europe and Eurasia is the most sanctioned region, and South and Central Asia the least.¹¹

Pace and timing: Through 2024, the USG had imposed between 35 and 176 GloMag sanctions annually, often announcing many designations around International Anti-Corruption and Human Rights Days (December 9 and 10, respectively). However, in the first year of the second Trump administration, only six GloMag sanctions were imposed.

Perpetrators: The USG has imposed GloMag sanctions on a wide range of actors for their involvement in sanctionable activity or their connections to it, including:

- state and non-state actors.
- human rights abusers whose actions harm only one victim, in addition to those whose actions harm large victim classes.
- senior officials, including former heads of state, as well as judges or prosecutors.¹²

The USG has often, though not always, failed to impose GloMag sanctions on corrupt or abusive officials from governments that are [security partners](#). Abuses against marginalized populations such as women, children, LGBTQIA+ persons, and Indigenous persons have also been [underrepresented](#).

Examples

Serious Human Rights Abuse

Human Trafficking: In December 2022, the USG for the first time issued GloMag sanctions for human trafficking abuses. In the largest GloMag action to date, the sanctions targeted companies, individuals, and vessels involved in [forced labor](#) on a China-registered, distant-water illegal fishing fleet. These were the first U.S. sanctions targeting an entity listed on the NASDAQ stock exchange. In June 2023, after one of the perpetrators' role in an Australian organization was uncovered, the individual [resigned](#), demonstrating the sanctions' impact beyond the United States.

¹¹ See Human Rights First et al.'s [Multilateral Magnitsky Sanctions at Five Years, 2022](#).

¹² The USG has sanctioned sitting heads of state under other sanctions programs, but not the GloMag program.

Also in December 2022, the USG sanctioned [Apollo Quiboloy](#) for sex trafficking, systemic rape, and physical abuse of young girls in the Philippines. Quiboloy has been [indicted](#) for sex trafficking-related crimes by U.S. federal prosecutors and is currently on the [FBI's most wanted](#) list. In 2024, he was arrested in the Philippines, where he is facing child abuse and sex trafficking charges. This was the first time that sex trafficking and rape were the central abuses sanctioned in a GloMag action.

Russia: In March 2023, the [USG designated six persons](#), including three individuals under GloMag, for their involvement in the arbitrary detention of Russian activist Vladimir Kara-Murza, who was jailed in April 2022 for criticizing Russia's invasion of Ukraine. This was the first use of GloMag based on a single arbitrary detention. [Canada](#) issued similar sanctions in November 2022, the [UK](#) in April 2023, and the [EU](#) in June 2023. Kara-Murza was released in a prisoner swap in August 2024.

The Gambia: In December 2017, the USG designated 14 persons for abuses and corruption in The Gambia. [Yahya Jammeh](#), the former president, was designated for killing and torturing political opponents and journalists and corruption; [Yankuba Badjie](#), a former intelligence chief, was designated for various abuses. In 2020, [Jammeh's wife](#) was sanctioned for supporting his corruption. In May 2022, the U.S. Justice Department [completed](#) a civil forfeiture action against Jammeh's Maryland mansion, seizing the property based on evidence it was purchased with the proceeds of corruption.

Saudi Arabia: After congressional pressure, the USG in 2018 designated [18 Saudi officials](#) for their involvement in the murder in Istanbul of Saudi dissident and journalist Jamal Khashoggi. Crown Prince Mohammed bin Salman, whom the [USG determined was responsible](#) for the assassination, was not sanctioned, though the case highlights the potential for using GloMag to sanction officials even from close U.S. partners.

China: In [three separate actions](#), the USG sanctioned eight high-ranking Chinese Communist Party officials as well as major government entities for involvement in human rights abuses against Uyghurs and other minorities in Xinjiang Uyghur Autonomous Region. The sanctioned entities included a regional security agency and the Xinjiang Production and Construction Corps, a large, government-backed administrative and paramilitary body. The third set of sanctions, in March 2021, was coordinated with similar actions by the other major Magnitsky jurisdictions ([Canada](#), the [EU](#), the [UK](#)).

Brazil: In July 2025, the USG sanctioned Brazilian judge [Alexandre de Moraes](#), ostensibly for using his position to undermine freedom of expression by authorizing “arbitrary pre-trial detentions.” To lift these sanctions and related tariffs, the Trump administration demanded that the charges against former Brazilian President Jair Bolsonaro in connection with an attempted coup be dropped. The USG also imposed GloMag sanctions against [de Moraes’ wife](#) and a company they own. This use of the GloMag program by the USG represented a clear [abuse](#) of this authority in order to shield political allies from accountability. The Treasury Department lifted the sanctions in December 2025.

Myanmar: In September 2025, the USG sanctioned [She Zhijiang](#), the owner and co-creator of a compound of cyber scam centers staffed by victims of human trafficking. Forced laborers at She’s scam center were physically abused or beaten, coerced into commercial sex work, and used to extort ransoms from their families. This GloMag sanction was part of a broader U.S. effort to target cyber scam centers in Southeast Asia engaged in human trafficking and other violations.

Corruption

Cambodia: In December 2019, the USG designated [Try Pheap](#), a Cambodian businessman, for building a large-scale illegal logging consortium reliant on the collusion of Cambodian officials. Eleven entities he owned or controlled were also sanctioned. [Kun Kim](#), a senior Cambodian general, was designated for reaping significant financial benefit by using Cambodian soldiers to intimidate, demolish, and clear out land sought by a Chinese state-owned entity.

DRC: In December 2017, the USG designated [Dan Gertler](#), an Israeli billionaire, for engaging in corrupt mining and oil deals with the Congolese state that resulted in more than \$1.36 billion lost revenue for the state. The USG issued [two follow-up actions](#), imposing sanctions on a total of 46 companies and individuals in Gertler’s network, making this one of the largest sets of GloMag sanctions.

Latvia: In December 2019, the USG sanctioned [Aivars Lembergs](#), a Latvian politician, for money laundering, expropriation, bribery, and abuse of office. Four entities that Lembergs owned or controlled were also designated, including the Ventspils Freeport Authority, which operated a major international port. The Latvian government removed Lembergs from control of the entity, leading the USG to [remove](#) the sanctions on it and highlighting sanctions' ability to spur action.

Zimbabwe: In March 2024, the USG sanctioned Zimbabwean President [Emmerson Mnangagwa](#) and his wife for engaging in corrupt acts. Mnangagwa was designated for taking bribes from smugglers in exchange for directing officials to facilitate the illicit sale of smuggled gold and diamonds. He was first sanctioned in 2003 under the now-ended U.S. sanctions program focused on Zimbabwe; the 2024 action made him the first sitting head of state sanctioned under Global Magnitsky. Mnangagwa was also sanctioned for human rights violations related to violent state repression



About Human Rights First: Human Rights First is a nonprofit, nonpartisan international human rights organization founded in 1978 to address the lack of legal protection for refugees and asylum seekers. We work alongside human rights defenders, hold human rights abusers accountable, fight for the conditions that uphold democracy, and provide tools that bring the power of AI and advanced technologies to justice and human rights movements.

Human Rights First is based in Los Angeles, New York, and Washington D.C.

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