

U.S. Sanctions on Russia: Legal Authorities and Related Actions

April 26, 2024

Congressional Research Service

<https://crsreports.congress.gov>

R48052



R48052

April 26, 2024

Cory Welt

Specialist in Russian and
European Affairs

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Sanctions are a central element of U.S. policy to deter, alter, and counter malign Russian activities. The United States maintains sanctions on Russia in part to reverse Russian aggression in Ukraine and to deter Russian aggression against other countries. Many Members of Congress support a robust use of sanctions amid concerns about Russia's international intentions and actions. Since the onset of Russia's 2014 invasion of Ukraine, the United States has coordinated many of its sanctions-related decisions with the European Union (EU), the United Kingdom (UK), and other allies and partners.

Sanctions related to Russia's invasion of Ukraine and other foreign activities that threaten U.S. interests are based on national emergency authorities granted to the President by Congress in the National Emergencies Act (NEA; P.L. 94-412; 50 U.S.C. 1601 et seq.) and the International Emergency Economic Powers Act (IEEPA; P.L. 95-223; 50 U.S.C. 1701 et seq.) and exercised in a series of executive orders beginning in 2014. In addition to national emergency authorities, Congress has asserted itself in shaping U.S. relations with Russia in legislation that authorizes or requires sanctions to counter Russia's malign activities, including the following:

- **Sergei Magnitsky Rule of Law Accountability Act of 2012** (P.L. 112-208, Title IV; 22 U.S.C. 5811 note)
- **Support for the Sovereignty, Integrity, Democracy, and Economic Stability of Ukraine Act of 2014**, as amended (SSIDES; P.L. 113-95; 22 U.S.C. 8901 et seq.)
- **Ukraine Freedom Support Act of 2014**, as amended (UFSA; P.L. 113-272; 22 U.S.C. 8921 et seq.)
- **Countering Russian Influence in Europe and Eurasia Act of 2017**, as amended (CRIEEA; P.L. 115-44, Countering America's Adversaries Through Sanctions Act [CAATSA], Title II; 22 U.S.C. 9501 et seq.)
- **Protecting Europe's Energy Security Act of 2019**, as amended (PEESA; P.L. 116-92, Title LXXV; 22 U.S.C. 9526 note)
- **Ending Importation of Russian Oil Act** (P.L. 117-109; 22 U.S.C. 8923 note)
- **Suspending Normal Trade Relations with Russia and Belarus Act** (P.L. 117-110; 19 U.S.C. 2101 note)
- **Russia and Belarus SDR Exchange Prohibition Act of 2022** (P.L. 117-185; 22 U.S.C. 8902 note)

In addition to sanctions related to Russia's invasion of Ukraine, the United States maintains sanctions on Russia in response to and to deter malicious cyber-enabled activities and influence operations; human rights abuses and corruption; the use of a chemical weapon; the use of energy exports as a coercive or political tool; and weapons proliferation and other illicit trade with North Korea and Iran, among other activities.

Debates about the impact and effectiveness of sanctions targeting Russia persist. Some U.S. and other officials and observers maintain that sanctions complicate Russia's ability to secure military victory in Ukraine and increase the costs to Russia of waging war. Others are skeptical that sanctions and export controls have compelled or can compel desired changes in Russian behavior, especially when some large economies such as China, India, Turkey, and Brazil have not imposed sanctions on Russia. The U.S. government and others have sought to tighten their sanctions programs and strengthen sanctions and export control enforcement to deny Russia the economic resources, technology, and materiel it needs for its war effort and to deter other Russian malign activities.

Members of Congress may wish to assess the conditions under which the United States should expand, maintain, or remove sanctions on Russia, the extent to which sanctions modifications or alternative policy options may be able to address potential shortcomings, and the conditions that would make such adjustments beneficial or appropriate in furtherance of U.S. foreign policy and national security.

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Introduction

This report provides an overview of U.S. sanctions authorities and related actions in response to Russian malign activities, including Russia's invasion of Ukraine. The report first discusses U.S. sanctions authorities and tools, particularly as they apply to Russia. It next describes various sanctions programs by which the executive branch has responded to Russian activities or that are available for this purpose, addressing authorities, tools, targets, and context. The report is compartmentalized so that readers primarily interested in a particular issue (e.g., sanctions in response to Russia's use of chemical weapons) may find the relevant information in a subsection of the report.

For short overviews of U.S. sanctions on Russia since 2022, see CRS Insight IN11869, *Russia's War Against Ukraine: Overview of U.S. Assistance and Sanctions*, by Cory Welt; and CRS In Focus IF12062, *Russia's War on Ukraine: Financial and Trade Sanctions*, coordinated by Rebecca M. Nelson. For information on European Union (EU) sanctions on Russia, see CRS Insight IN11897, *Russia's War Against Ukraine: European Union Responses and U.S.-EU Relations*, by Kristin Archick. For information on the economic impact of sanctions on Russia, see CRS In Focus IF12092, *The Economic Impact of Russia Sanctions*, by Rebecca M. Nelson.

U.S. Sanctions on Russia: A Key Policy Tool

Sanctions are a central element of U.S. policy to deter, alter, and counter malign Russian activities. The United States maintains sanctions on Russia in part to reverse Russian aggression in Ukraine and to deter Russian aggression against other countries. The United States also maintains sanctions on Russia in response to and to deter malicious cyber-enabled activities and influence operations, including election interference, human rights abuses and corruption, the use of a chemical weapon, the use of energy exports as a coercive or political tool, weapons proliferation and other illicit trade with North Korea and Iran, and support to the governments of Syria and Venezuela. Many Members of Congress support a robust use of sanctions amid concerns about Russia's international intentions and actions.

Sanctions related to Russia's invasion of Ukraine and other foreign activities that threaten U.S. interests are based on national emergency authorities granted to the office of the President by Congress in the National Emergencies Act (NEA; P.L. 94-412; 50 U.S.C. 1601 et seq.) and the International Emergency Economic Powers Act (IEEPA; P.L. 95-223; 50 U.S.C. 1701 et seq.) and exercised in a series of executive orders (E.O.s) beginning in 2014 by President Barack Obama (E.O.s 13660, 13661, 13662, 13685); President Donald Trump (E.O.s 13849 and 13883); and President Joe Biden (E.O.s 14024, 14039, 14065, 14066, 14068, 14071, and 14114). The Obama, Trump, and Biden Administrations have used these orders to impose sanctions on thousands of individuals, entities, vessels, and aircraft.

U.S. sanctions generally block assets of and transactions with designated individuals and entities. They also impose visa restrictions on individuals; restrict Russia's central bank from drawing on its U.S. dollar-denominated reserves; bar new U.S. investment in Russia and transactions related to Russian sovereign debt; restrict the import of energy, gold, certain diamonds and metals, and certain other goods from Russia; ban the export of luxury goods and certain services to Russia (including maritime shipping services for Russian oil transactions above a certain price); impose export controls affecting Russia's access to sensitive or desired U.S.-origin goods and technology; raise tariffs on many imports from Russia; and prohibit Russian use of U.S. airspace and ports.

Congress has asserted itself in shaping U.S. relations with Russia in legislation that authorizes or requires sanctions to counter Russia's malign activities, including the following:

- Sergei Magnitsky Rule of Law Accountability Act of 2012 (P.L. 112-208, Title IV; 22 U.S.C. 5811 note)
- Support for the Sovereignty, Integrity, Democracy, and Economic Stability of Ukraine Act of 2014, as amended (SSIDES; P.L. 113-95; 22 U.S.C. 8901 et seq.)
- Ukraine Freedom Support Act of 2014, as amended (UFSA; P.L. 113-272; 22 U.S.C. 8921 et seq.)
- Countering Russian Influence in Europe and Eurasia Act of 2017, as amended (CRIEEA; P.L. 115-44, Countering America's Adversaries Through Sanctions Act [CAATSA], Title II; 22 U.S.C. 9501 et seq.)
- Protecting Europe's Energy Security Act of 2019, as amended (PEESA; P.L. 116-92, Title LXXV; 22 U.S.C. 9526 note)
- Ending Importation of Russian Oil Act (P.L. 117-109; 22 U.S.C. 8923 note)
- Suspending Normal Trade Relations with Russia and Belarus Act (P.L. 117-110; 19 U.S.C. 2101 note)
- Russia and Belarus SDR Exchange Prohibition Act of 2022 (P.L. 117-185; 22 U.S.C. 8902 note)
- annual Department of State, Foreign Operations, and Related Programs appropriations, most recently for FY2024 (P.L. 118-47, Division F)

The executive branch also has used other E.O.s and drawn on other statutory authority to impose sanctions in response to Russian activities of concern, including malicious cyber-enabled activities, election interference, human rights abuses, the use of a chemical weapon, weapons proliferation and other illicit trade with North Korea and Iran, and support to the governments of Syria and Venezuela.

Since the onset of Russia's 2014 invasion of Ukraine, the United States has coordinated many of its sanctions-related decisions with the EU, the United Kingdom (UK), and other allies and partners.

Use of Economic Sanctions to Further Foreign Policy and National Security Objectives

Economic sanctions are tools Congress and the President may use to seek to alter, deter, or counter the objectionable behavior of a foreign government, individual, or entity in furtherance of U.S. national security or foreign policy objectives.¹

Scholars have broadly defined economic sanctions as "coercive economic measures taken against one or more countries [or individuals or entities] to force a change in policies, or at least to demonstrate a country's opinion about the other's policies."² Economic sanctions may include

¹ For more, see CRS In Focus IF12390, *U.S. Sanctions: Overview for the 118th Congress*, by Liana W. Rosen and Rebecca M. Nelson.

² Barry E. Carter, *International Economic Sanctions: Improving the Haphazard U.S. Legal Regime* (Cambridge: Cambridge University Press, 1988), p. 4. Also see Gary Hufbauer et al., *Economic Sanctions Reconsidered*, 3rd ed. (Washington, DC: Peterson Institute for International Economics, 2007); and U.S. International Trade Commission, (continued...)

limits on trade, such as overall restrictions or restrictions on particular exports or imports; the blocking of assets and interest in assets subject to U.S. jurisdiction; limits on access to the U.S. financial system, including limiting or prohibiting transactions involving U.S. individuals and businesses; and restrictions on private and government loans, investments, insurance, and underwriting. Sanctions also can include a denial of foreign assistance, government procurement contracts, and participation or support in international financial institutions.³

Sanctions that target third parties—those not engaged in the objectionable activity subject to sanctions but engaged with the individuals or entities that are—are popularly referred to as *secondary sanctions*. In addition to seeking to deny revenue to the party engaged in objectionable activity, secondary sanctions can be constructed to deter sanctions evasion, penalizing those that facilitate a means to avoid detection or provide alternative access to funds or imported goods and technology.

The United States has applied various sanctions in response to malign Russian activities. Many sanctions on Russia do not target the Russian state directly; instead, they consist of *designations* of specific individuals, entities, vessels, and aircraft on the Specially Designated Nationals and Blocked Persons List (SDN) of the Treasury Department's Office of Foreign Assets Control (OFAC).⁴ Sanctions block the U.S.-based assets of individuals and entities designated as SDNs and generally prohibit U.S. individuals and entities from engaging in transactions with them.⁵ In addition, the Secretary of State, in consultation with the Secretary of Homeland Security and the Attorney General, is tasked with denying entry into the United States of, or revoking visas granted to, designated foreign nationals.⁶

Some sanctions imposed in response to Russia's invasion of Ukraine target sectors of Russia's economy. *Sectoral sanctions* can refer to designations of individuals and entities that operate in specified economic sectors. They also can restrict trade in certain products and services, as well as trade and investment in specific geographic areas, including the Russia-occupied Crimea region of Ukraine and other Russia-occupied areas of eastern Ukraine. Sectoral sanctions can be narrowly applied, as well. Some sectoral sanctions apply to specific entities in Russia's financial, energy, and defense sectors that OFAC has identified for inclusion on the Sectoral Sanctions

Overview and Analysis of Current U.S. Unilateral Economic Sanctions, Investigation No. 332-391, Publication 3124, Washington, DC, August 1998.

³ Not everyone agrees on what the sanctions toolbox includes. For example, some characterize export controls, limits on foreign assistance, or visa denials as foreign policy tools that are less about changing the target's behavior than about administering U.S. foreign policy while meeting the requirements and obligations the United States assumes under treaties, international agreements, and its own public laws. See Senator Jesse Helms, "What Sanctions Epidemic? U.S. Business' Curious Crusade," *Foreign Affairs*, vol. 78, no. 1 (January/February 1999), pp. 2-8.

⁴ The Specially Designated Nationals and Blocked Persons List (SDN) is available and searchable at Department of the Treasury, Office of Foreign Assets Control (OFAC), "Specially Designated Nationals and Blocked Persons List (SDN) Human Readable Lists," <https://ofac.treasury.gov/specially-designated-nationals-and-blocked-persons-list-sdn-human-readable-lists>.

⁵ Sanctions programs sometimes include the designation of vessels and aircraft owned or controlled by a designated individual or entity in order to preempt sanctions evasion by means of re-registration or reflagging.

⁶ Generally, visa denials are explicitly authorized in the executive orders (E.O.s) that form the Russia sanctions program. In addition, in 2011, President Obama proclaimed that "the interests of the United States are served by suspending entry into the United States, as immigrants or nonimmigrants, of aliens whose property and interests in property have been blocked by an E.O. issued in whole or in part pursuant to the President's authority under the International Emergency Economic Powers Act." Proclamation 8693 of July 24, 2011, "Suspension of Entry of Aliens Subject to United Nations Security Council Travel Bans and International Emergency Economic Powers Act Sanctions," 76 *Federal Register* 44751, July 27, 2011. Proclamation 8693 states that it remains in effect "until such time as the Secretary of State determines that it is no longer necessary and should be terminated, either in whole or in part."

Identifications (SSI) List or the Non-SDN Menu-Based Sanctions (NS-MBS) List.⁷ These sectoral sanctions prohibit U.S. individuals and entities from engaging in specific kinds of transactions related to lending, investment, and/or trade with entities on the SSI List, but they permit other transactions.

The United States also imposes export controls on Russia, administered by the Department of Commerce's Bureau of Industry and Security (BIS).⁸ BIS restricts exports to Russia, as a jurisdiction, to meet U.S. treaty obligations related to chemical and biological weapons, nuclear nonproliferation, and missile technology. In addition, BIS restricts Russia-bound exports for reasons of U.S. national security, regional stability, and crime control.⁹ BIS uses its Lists of Parties of Concern—the Denied Persons List, Entity List, Unverified List, and Military End-Users List—along with Country Guidance to inform exporters and transshippers of U.S.-origin goods and materiel of restrictions on Russia as an end destination.¹⁰

Role of the President

The President, for various reasons related to constitutional construction and legal challenges throughout U.S. history, holds considerable authority to use economic sanctions in support of U.S. foreign policy.¹¹ If Congress enacts sanctions in legislation, the President is to adhere to the provisions of the legislation but is responsible for determining the individuals and entities subject to sanctions.

The President also often has the authority to be the sole decisionmaker in initiating and imposing sanctions. The President does so by determining, pursuant to IEEPA, that there has arisen an “unusual and extraordinary threat, which has its source in whole or substantial part outside the United States, to the national security, foreign policy, or economy of the United States.”¹² The President then declares that a national emergency exists, as provided for in NEA; submits the declaration to Congress; and establishes a public record by publishing it in the *Federal Register*.¹³

⁷ The Sectoral Sanctions Identifications (SSI) List and the Non-SDN Menu-Based Sanctions (NS-MBS) List are available at Department of the Treasury, OFAC, “Other OFAC Sanctions Lists,” <https://ofac.treasury.gov/other-ofac-sanctions-lists>.

⁸ The U.S. Department of Commerce's Bureau of Industry and Security (BIS) lists “resources on export controls implemented in response to Russia's invasion of Ukraine” at <https://www.bis.doc.gov/index.php/policy-guidance/country-guidance/russia-belarus>.

⁹ Export Administration Regulations (EAR), BIS, Commerce Control List Overview and Country Chart, 15 C.F.R. Part 738, Supp. 1 (as of December 8, 2023). Footnote 6 of the Country Chart states, “See [15 C.F.R.] §746.5 of the EAR for additional license requirements under the Russian Industry Sector Sanctions ... and items identified in supplement no. 2 to part 746 of the EAR. See §746.8 of the EAR for Sanctions against Russia and Belarus, including additional license requirements.”

¹⁰ See 15 C.F.R. Part 744 and related Supplements 4 (Entity), 6 (Unverified), and 7 (Military End-User [MEU]). BIS established an Entity List in 1997 to oversee U.S. compliance with international treaty and agreement obligations to control the export of materials related to weapons of mass destruction. Subsequently, the Entity List expanded to include entities engaged in activities considered contrary to U.S. national security or foreign policy interests. U.S. Department of Commerce, “Entity List,” <https://www.bis.doc.gov/index.php/policy-guidance/lists-of-parties-of-concern/entity-list>.

¹¹ The Constitution divides foreign policy powers between the executive and legislative branches in a way that requires each branch to remain engaged with and supportive of, or responsive to, the interests and intentions of the other. See U.S. Congress, House Committee on Foreign Affairs, *Strengthening Executive-Legislative Consultation on Foreign Policy*, Congress and Foreign Policy Series (No. 8), 98th Cong., 1st sess., October 1983, pp. 9-11.

¹² International Emergency Economic Powers Act (IEEPA); P.L. 95-223, §202(a); 50 U.S.C. 1701(a). For more, see CRS Report R45618, *The International Emergency Economic Powers Act: Origins, Evolution, and Use*, coordinated by Christopher A. Casey.

¹³ National Emergencies Act (NEA); P.L. 94-412, §201; 50 U.S.C. 1621.

Under a national emergency, the President may invoke the authorities granted the office in IEEPA to investigate, regulate, or prohibit transactions in foreign exchange, use of U.S. banking instruments, the import or export of currency or securities, and transactions involving property or interests in property under U.S. jurisdiction.¹⁴

President Obama invoked NEA and IEEPA authorities to declare that Russia's 2014 invasion of Ukraine constituted a threat to the United States and to declare the national emergency on which most sanctions related to Russia's initial invasion of Ukraine in 2014 are based.¹⁵ In addition, President Obama and President Trump invoked NEA and IEEPA authorities to declare national emergencies related to cyber-enabled malicious activities and election interference.¹⁶ President Biden has invoked NEA and IEEPA authorities in 2021 to declare a national emergency related to specified harmful foreign activities undertaken by or on behalf of the Russian government.¹⁷ Most sanctions designations related to Russia's expanded invasion of Ukraine starting in 2022 are based on President Biden's 2021 declaration.

Role of Congress

Congress influences which foreign policy and national security concerns the United States responds to with sanctions by enacting legislation to authorize, and in some instances require, the President to use sanctions. Congress has taken the lead in authorizing or requiring the President (or executive branch) to use sanctions in an effort to deter weapons proliferation, international terrorism, illicit narcotics trafficking, human rights abuses, regional instability, cyberattacks, corruption, and money laundering. In the case of Russia, Congress has sought to draw attention to Russian human rights abuses and corruption, initially as related to the death in detention of accountant Sergei Magnitsky in 2009; Russia's invasion of Ukraine; and other malign activities, including cyberattacks, efforts to destabilize other countries neighboring Russia, and the use of energy exports for coercive purposes.¹⁸ Legislation can define what sanctions the executive branch is to apply, as well as the conditions that need to be met before these sanctions may be lifted.

One limitation on the role of Congress in establishing sanctions originates in the U.S. Constitution's bill of attainder clause.¹⁹ Congress may not enact legislation that "legislatively determines guilt and inflicts punishment upon an identifiable individual without provision of the protections of a judicial trial."²⁰ In other words, Congress may enact legislation that broadly defines categories of sanctions targets and objectionable behavior, but it is left to the President to "[determine] guilt and [inflict] punishment"—that is, to populate the target categories, through designations, with specific individuals and entities.

¹⁴ IEEPA, §203; 50 U.S.C. 1702.

¹⁵ See footnote 27.

¹⁶ See footnote 66 and footnote 73. Both declarations have been continued by the Biden Administration.

¹⁷ See "Sanctions Introduced After Russia's 2022 Full-Scale Invasion of Ukraine" and footnote 31.

¹⁸ See legislation listed in "U.S. Sanctions on Russia: A Key Policy Tool" above.

¹⁹ "No Bill of Attainder or ex post facto Law Will Be Passed." U.S. Constitution, Article I, §9, clause 3.

²⁰ See out-of-print CRS Report R40826, *Bills of Attainder: The Constitutional Implications of Congress Legislating Narrowly*, available to congressional offices on request.

Sanctions Implementation

In the executive branch, several agencies have varying degrees of responsibility in implementing and administering sanctions. Primary agencies, broadly speaking, have responsibilities as follows:

- **Department of the Treasury’s OFAC** designates SDNs to be subject to the blocking of U.S.-based assets; designates non-SDNs for which investments or transactions may be subject to conditions or restrictions; prohibits transactions; licenses transactions relating to exports and investments (and limits those licenses); restricts access to U.S. financial services; and restricts transactions related to travel, in limited circumstances.
- **Department of State** restricts visas, arms sales, and foreign aid; implements arms embargos required by the United Nations; prohibits the use of U.S. passports to travel, in limited circumstances; and downgrades or suspends diplomatic relations.
- **Department of Commerce’s BIS** restricts licenses for commercial exports, end users, and destinations.
- **Department of Defense** restricts arms sales and other forms of military cooperation.
- **Department of Justice** investigates and prosecutes violations of sanctions and export laws.²¹

Coordination with Allies and Partners

Similar to the United States, the EU, the UK, Canada, and other U.S. allies and partners have imposed sanctions—or *restrictive measures* in EU parlance—in response to Russia’s war against Ukraine.²² The EU also has imposed sanctions in response to Russia’s use of chemical weapons, human rights violations, and malicious cyber activity.²³ EU and other non-U.S. sanctions include travel bans, asset freezes, trade restrictions, and export controls. In 2022, the EU directed the Society for Worldwide Interbank Financial Telecommunication (SWIFT) and other specialized financial messaging services to cease serving 10 leading Russian financial institutions.²⁴

The EU has imposed sanctions largely in cooperation with the United States, and EU sanctions are similar, but not identical, to U.S. sanctions. Most EU sanctions are imposed for a defined period of time (usually six months or a year) to incentivize change and provide the EU with flexibility to adjust the sanctions as warranted. Imposing EU sanctions requires the unanimous

²¹ Other departments, bureaus, agencies, and offices of the executive branch also weigh in, but to a lesser extent. The Departments of State and the Treasury reportedly work closely on core designations. The Department of Homeland Security, Attorney General, and Federal Bureau of Investigation all might review decisions relating to visas; Customs and Border Protection has a role in monitoring imports; the Department of Energy, in consultation with the Department of Commerce, has responsibilities related to export control of nuclear materials; and the National Security Council reviews foreign policy and national security determinations and E.O.s as part of the interagency process.

²² European Council, “EU Restrictive Measures Against Russia over Ukraine,” updated March 6, 2024; and CRS Insight IN11897, *Russia’s War Against Ukraine: European Union Responses and U.S.-EU Relations*, by Kristin Archick.

²³ European Council, “Chemical Weapons: EU Restrictive Measures Prolonged for an Additional Year,” October 9, 2023; European Council, “EU Global Human Rights Sanctions Regime: Restrictive Measures Prolonged,” December 4, 2023; and European Council, “Cyber-Attacks: Council Extends Sanctions Regime Until 18 May 2025,” May 16, 2022.

²⁴ European Council, “Russia’s Military Aggression Against Ukraine: EU Bans Certain Russian Banks from SWIFT System and Introduces Further Restrictions,” March 2, 2022; and Annex VIII of Council Decision 2014/512/CFSP, available at <https://eur-lex.europa.eu>.

agreement of all EU member states. Unanimity among EU member states also is required to renew (i.e., extend) EU sanctions.

U.S. Sanctions on Russia

The United States maintains sanctions on Russia related to Russia's invasion of Ukraine, malicious cyber activities and influence operations (including election interference), human rights abuses and corruption, use of chemical weapons, use of energy exports as a coercive or political tool, weapons proliferation and other illicit trade with North Korea and Iran, support to the governments of Syria and Venezuela, and other activities.

Sanctions Related to Russia's War Against Ukraine

Many of the sanctions that the U.S. government has imposed on Russia have been in response to Russia's war against Ukraine, including Russia's initial invasion of Ukraine in 2014, when Russia first occupied Ukraine's Crimea region and parts of eastern Ukraine, and Russia's expanded, full-scale invasion starting in February 2022.

In March 2014, the Obama Administration said it would impose increasing costs on Russia, in coordination with the EU and others, until Russia "abides by its international obligations and returns its military forces to their original bases and respects Ukraine's sovereignty and territorial integrity."²⁵ Almost eight years later, in February 2022, the Biden Administration announced "severe and immediate economic costs on Russia in response to Putin's war of choice against Ukraine.... The scale of Putin's aggression and the threat it poses to the international order require a resolute response, and we will continue imposing severe costs if he does not change course."²⁶

Sanctions Introduced Between 2014 and 2022

In 2014, President Obama issued a series of four E.O.s related to Russia's initial invasion of Ukraine: E.O.s 13660, 13661, 13662, and 13685 (see **Table 1**).²⁷ Two of these E.O.s address specific objectionable behavior related to the destabilization and invasion of Ukraine. E.O. 13660 authorizes sanctions against those the President determines have undermined democratic processes or institutions in Ukraine; undermined Ukraine's peace, security, stability, sovereignty, or territorial integrity; misappropriated Ukrainian state assets; or illegally asserted governmental authority over any part of Ukraine. E.O. 13685 prohibits U.S. business, trade, or investment in occupied Crimea and provides for sanctions against those the President determines have operated in, or been the leader of an entity operating in, occupied Crimea.

²⁵ White House, "Fact Sheet: Ukraine-Related Sanctions," March 17, 2014.

²⁶ White House, "Fact Sheet: Joined by Allies and Partners, the United States Imposes Devastating Costs on Russia," February 24, 2022.

²⁷ The President declared that events in Ukraine constituted a national emergency in the first E.O.; the subsequent three orders built on and expanded that initial declaration. E.O. 13660 must be extended annually to remain in force; the President extended it most recently on March 5, 2024 (89 *Federal Register* 15947). E.O. 13660 of March 6, 2014, "Blocking Property of Certain Persons Contributing to the Situation in Ukraine," 79 *Federal Register* 13493, March 10, 2014; E.O. 13661 of March 16, 2014, "Blocking Property of Additional Persons Contributing to the Situation in Ukraine," 79 *Federal Register* 15535, March 19, 2014; E.O. 13662 of March 20, 2014, "Blocking Property of Additional Persons Contributing to the Situation in Ukraine," 79 *Federal Register* 16169, March 24, 2014; and E.O. 13685 of December 19, 2014, "Blocking Property of Certain Persons and Prohibiting Certain Transactions with Respect to the Crimea Region of Ukraine," 79 *Federal Register* 77357, December 24, 2014.

The other two E.O.s authorize sanctions against a broader range of targets. E.O. 13661 authorizes sanctions against Russian government officials, those who offer them support, and those operating in the Russian arms sector. E.O. 13662 authorizes sanctions against individuals and entities that operate in key sectors of the Russian economy, as determined by the Secretary of the Treasury, in consultation with the Secretary of State. The Department of the Treasury subsequently determined that E.O. 13662 would apply to the financial services, energy, and defense and related materiel sectors of the Russian economy.²⁸

Related Legislation

In 2014, Congress enacted and President Obama signed into law the Support for the Sovereignty, Integrity, Democracy, and Economic Stability of Ukraine Act (SSIDES, enacted April 3, 2014) and the Ukraine Freedom Support Act (UFSA, enacted December 18, 2014).²⁹ In 2017, Congress enacted and President Trump signed into law the Countering America's Adversaries Through Sanctions Act of 2017 (CAATSA), which includes as Title II the Countering Russian Influence in Europe and Eurasia Act of 2017 (CRIEEA, see text box below).³⁰ For a summary of sanctions provisions in SSIDES, UFSA, and CRIEEA, as well as in other legislation, see **Appendix B**.

Countering Russian Influence in Europe and Eurasia Act of 2017

On August 2, 2017, President Trump signed into law the Countering America's Adversaries Through Sanctions Act of 2017 (CAATSA; P.L. 115-44), which includes as Title II the Countering Russian Influence in Europe and Eurasia Act of 2017 (CRIEEA; 22 U.S.C. 9501 et seq.). CRIEEA codifies Ukraine-related and cyber-related executive orders (E.O.s), strengthens sanctions authorities initiated in Ukraine-related E.O.s and legislation, and identifies several new sanctions targets. It also establishes congressional review of any action the President takes to ease or lift various sanctions imposed on Russia. In September 2018, President Trump issued E.O. 13849 establishing the means to implement certain sanctions provided for in CRIEEA (and the Ukraine Freedom Support Act of 2014, as amended [UFSA; P.L. 113-272; 22 U.S.C. 8921 et seq.]).

As of March 2024, the U.S. Department of the Treasury's Office of Foreign Assets Control had issued 56 designations based on new sanctions authorities in CRIEEA, relating to undermining cybersecurity and/or affiliation with Russian intelligence services subject to U.S. sanctions (§224, 45 designations), human rights abuses (§228, amending the Support for the Sovereignty, Integrity, Democracy, and Economic Stability of Ukraine Act [SSIDES; P.L. 113-95; 22 U.S.C. 8901 et seq.], 3 designations), arms sales (§231, 6 designations and, on 1 entity, other specified sanctions), and energy export pipeline development (§232, 2 designations). These designations are discussed in the relevant sections of this report.

Source: E.O. 13849, "Authorizing the Implementation of Certain Sanctions Set Forth in the Countering America's Adversaries Through Sanctions Act," 83 *Federal Register* 48195, September 20, 2018.

Sanctions Introduced After Russia's 2022 Full-Scale Invasion of Ukraine

The authority on which OFAC has based most of the sanctions designations issued in response to Russia's war against Ukraine since 2022 is E.O. 14024, which President Biden issued on April 15, 2021, and expanded in December 2023 with the issuance of E.O. 14114.³¹ E.O. 14024, as

²⁸ OFAC, "Sanctions Actions Pursuant to Executive Orders 13660, 13661 and 13662," 79 *Federal Register* 63021, October 21, 2014. Section 1(a)(i) of E.O. 13662 specifies that sanctions could be applied to persons operating in key sectors of the Russian economy, "such as financial services, energy, metals and mining, engineering, and defense and related materiel."

²⁹ Respectively, P.L. 113-95; 22 U.S.C. 8901 et seq.; and P.L. 113-272; 22 U.S.C. 8921 et seq.

³⁰ P.L. 115-44, Title II; 22 U.S.C. 9501 et seq.

³¹ E.O. 14024 of April 15, 2021, "Blocking Property with Respect to Specified Harmful Foreign Activities of the Government of the Russian Federation," 86 *Federal Register* 20249, April 19, 2021; and E.O. 14114 of December 22, 2023, "Taking Additional Steps with Respect to the Russian Federation's Harmful Activities," 88 *Federal Register* (continued...)

amended, authorizes sanctions against those responsible for or who have engaged in specified “harmful foreign activities” on behalf of the Russian government. These include, among others, activities that “undermine the peace, security, political stability, or territorial integrity of the United States, its allies, or its partners”; the undermining of democratic processes or institutions; and the circumvention of U.S. sanctions.³² E.O. 14024 also authorizes the imposition of sanctions on Russian government entities and officials (and their spouses and families) and persons determined to be operating in the technology sector or the defense and related materiel sector of the Russian economy, or any other sector of the Russian economy as may be determined.³³

Subsequently, the Department of the Treasury determined that E.O. 14024 also would apply to the following sectors of the Russian economy: financial services, aerospace, electronics, marine, accounting, trust and corporate formation services, management consulting, quantum computing, metals and mining, architecture, engineering, construction, manufacturing, and transportation.³⁴

Also pursuant to E.O. 14024, as amended by E.O. 14114, foreign financial institutions may be denied access to the U.S. financial system if they (1) conduct or facilitate significant transactions for designated persons operating in “the technology, defense and related materiel, construction, aerospace, or manufacturing sectors of the Russian Federation economy, or other such sectors as may be determined to support Russia’s military-industrial base” or (2) conduct or facilitate significant transactions, or provide any service, “involving Russia’s military-industrial base.”³⁵

In February and March 2022, President Biden issued four other E.O.s authorizing sanctions and related actions in response to Russia’s war against Ukraine:

- **E.O. 14065** of February 21, 2022, prohibiting U.S. trade and investment in “the so-called DNR or LNR [occupied] regions of Ukraine or such other regions of Ukraine as may be determined” and authorizing sanctions against those the President determines have operated in, or been the leader of an entity operating in, such regions.³⁶
- **E.O. 14066** of March 8, 2022, prohibiting importation into the United States of Russia-origin oil, petroleum products, liquefied natural gas, coal, and coal products and prohibiting new U.S. investment in Russia’s energy sector.³⁷
- **E.O. 14068** of March 11, 2022, prohibiting importation into the United States of Russia-origin seafood, alcoholic beverages, non-industrial diamonds, and other products as may be determined; the export to Russia of U.S. luxury goods and other items as may be determined; and the export to Russia of U.S. dollar-

89271, December 26, 2023. E.O. 14024 must be extended annually to remain in force; the President extended it most recently on April 9, 2024 (89 *Federal Register* 25495).

³² The other “harmful foreign activities” that E.O. 14024 specifies are malicious cyber-enabled activities, election interference, transnational corruption, and the unlawful killing or harming of U.S. persons or U.S. ally or partner nationals.

³³ E.O. 14024 also directs the imposition of sanctions on Russian persons who support governments subject to U.S. sanctions or who disrupt energy supplies to Europe or Asia.

³⁴ Determinations are available at OFAC, “Russian Harmful Foreign Activities Sanctions.”

³⁵ E.O. 14114.

³⁶ E.O. 14065 of February 21, 2022, “Blocking Property of Certain Persons and Prohibiting Certain Transactions with Respect to Continued Russian Efforts to Undermine the Sovereignty and Territorial Integrity of Ukraine,” 87 *Federal Register* 10293, February 23, 2022.

³⁷ E.O. 14066 expands on the national emergency declared in E.O. 14024. E.O. 14066 of March 8, 2022, “Prohibiting Certain Imports and New Investments with Respect to Continued Russian Federation Efforts to Undermine the Sovereignty and Territorial Integrity of Ukraine,” 87 *Federal Register* 13625, March 10, 2022. For more, see CRS In Focus IF12062, *Russia’s War on Ukraine: Financial and Trade Sanctions*, coordinated by Rebecca M. Nelson.

denominated banknotes.³⁸ Subsequently, the Treasury Department determined that E.O. 14068 also would apply to the importation of Russia-origin gold, diamond jewelry, unsorted diamonds, and (in April 2024) aluminum, copper, and nickel produced on or after April 13, 2024.³⁹

As amended by E.O. 14114, E.O. 14068 also prohibits the importation into the United States of Russia-origin products that are “incorporated or substantially transformed into other products outside of the Russian Federation,” including seafood, diamonds, and “any other such products as may be determined.”

- **E.O. 14071** of April 6, 2022, prohibiting new U.S. investment in the Russian Federation and the U.S. export of any category of services to Russia as may be determined.⁴⁰ Subsequently, the Treasury Department determined that E.O. 14071 would apply to the export to Russia of U.S. services in accounting, trust and corporate formation, management consulting, quantum computing, architecture, and engineering, as well as to certain services related to metal exchanges and trading.⁴¹ In addition, the Secretary of the Treasury determined that E.O. 14071 would apply to the following U.S. services relating to the maritime transport of Russia-origin crude oil: trading/commodities brokering, financing, shipping, insurance, flagging, and customs brokering. These services are authorized when the price of the crude oil does not exceed a determined price cap, currently set at \$60/barrel.⁴²

Related Legislation

Following Russia’s expanded invasion of Ukraine in 2022, Congress passed legislation to restrict certain kinds of trade with Russia. On April 8, 2022, President Biden signed into law the Ending Importation of Russian Oil Act, which banned the importation of Russian oil and other energy products into the United States.⁴³ The James M. Inhofe National Defense Authorization Act for Fiscal Year 2023, enacted on December 23, 2022, includes a requirement to impose sanctions on foreign persons that knowingly engage in significant gold-related transactions with Russia.⁴⁴

In addition, Congress passed the Suspending Normal Trade Relations with Russia and Belarus Act, which President Biden signed into law on April 8, 2022.⁴⁵ Accordingly, on June 27, 2022, the President issued a proclamation to raise tariffs for Russian products including steel and aluminum; minerals, ores, and metals; chemicals; arms and ammunition; wood and paper

³⁸ E.O. 14068 relied on the national emergency declared in E.O. 14024. E.O. 14068 of March 11, 2022, “Prohibiting Certain Imports, Exports, and New Investment with Respect to Continued Russian Federation Aggression,” 87 *Federal Register* 13625, March 15, 2022.

³⁹ Determinations are available at OFAC, “Russian Harmful Foreign Activities Sanctions.”

⁴⁰ E.O. 14071 relied on the national emergency declared in E.O. 14024. E.O. 14071 of April 6, 2022, “Prohibiting New Investment in and Certain Services to the Russian Federation in Response to Continued Russian Federation Aggression,” 87 *Federal Register* 20999, April 8, 2022.

⁴¹ Determinations are available at OFAC, “Russian Harmful Foreign Activities Sanctions.”

⁴² *Ibid.*

⁴³ P.L. 117-109; 22 U.S.C. 8923 note. For more, see CRS In Focus IF12062, *Russia’s War on Ukraine: Financial and Trade Sanctions*, coordinated by Rebecca M. Nelson.

⁴⁴ P.L. 117-263, §5590; 22 U.S.C. 9521 note.

⁴⁵ P.L. 117-110; 19 U.S.C. 2101 note. For more, see CRS In Focus IF12062, *Russia’s War on Ukraine: Financial and Trade Sanctions*, coordinated by Rebecca M. Nelson.

products; aircraft and parts; and automotive parts.⁴⁶ On February 24, 2023, the President issued two proclamations to raise tariffs further on Russian aluminum and most Russian metal and metal products, as well as on additional products including chemicals and minerals.⁴⁷

Congress also passed the Russia and Belarus SDR Exchange Prohibition Act of 2022, which President Biden signed into law on October 4, 2022. This act prohibits the Secretary of the Treasury “from engaging in transactions involving the exchange of Special Drawing Rights issued by the International Monetary Fund that are held by the Russian Federation or Belarus.”⁴⁸

In April 2024, Congress passed the Rebuilding Economic Prosperity and Opportunity for Ukrainians (REPO for Ukrainians) Act, which President Biden signed into law on April 24, 2024 (P.L. 118-50, Division F). The act authorizes the President to “seize, confiscate, transfer, or vest” Russian sovereign assets that are subject to U.S. jurisdiction and have been blocked or effectively immobilized (see “Non-SDN Lists” below) for the purpose of providing compensation or assistance to Ukraine.⁴⁹ The act prohibits the release of Russia’s sovereign assets, except as authorized, until the President certifies that hostilities between Russia and Ukraine have ceased and either “full compensation has been made to Ukraine” or Russia “is participating in a bona fide international mechanism that, by agreement, will discharge” Russia’s obligations to compensate Ukraine.

Specially Designated Nationals

In response to Russia’s war against Ukraine, OFAC has designated more than 4,500 individuals, entities, vessels, and aircraft as Specially Designated Nationals (SDNs; see **Table 1**). Of these, OFAC has issued more than 4,100 sanctions designations pursuant to E.O. 14024 since the start of Russia’s expanded invasion of Ukraine in February 2022. Designees include the following members and entities of the Russian government:

- Russian President Vladimir Putin and Prime Minister Mikhail Mishustin;
- other senior government officials (including ministers of foreign affairs, defense, and finance, and heads of the armed forces and central bank);
- Russia’s legislature (the State Duma and Federation Council) and its members;
- regional governors; and
- proxy occupation officials.⁵⁰

⁴⁶ Proclamation 10420 of June 27, 2022, “Increasing Duties on Certain Articles from the Russian Federation,” 87 *Federal Register* 38875, June 30, 2022; and Office of the United States Trade Representative, “Statement by Ambassador Katherine Tai on New G7 Sanctions Commitments,” June 27, 2022.

⁴⁷ Proclamation 10522 of February 24, 2023, “Adjusting Imports of Aluminum into the United States,” 88 *Federal Register* 13267, March 2, 2023; and Proclamation 10523 of February 24, 2023, “Increasing Duties on Certain Articles from the Russian Federation,” 88 *Federal Register* 13277, March 2, 2023.

⁴⁸ P.L. 117-185; 22 U.S.C. 8902 note. For more on Special Drawing Rights, see CRS In Focus IF10676, *The International Monetary Fund*, by Martin A. Weiss; and CRS In Focus IF12541, *Iran and Special Drawing Rights (SDRs)*, by Rebecca M. Nelson and Martin A. Weiss.

⁴⁹ The act states that \$4-\$5 billion in immobilized Russian sovereign assets is reportedly subject to U.S. jurisdiction, out of approximately \$300 billion immobilized worldwide (of which approximately \$190 billion is reportedly subject to Belgian jurisdiction).

⁵⁰ OFAC also has drawn on E.O. 14065 to designate two Russia-occupied entities in eastern Ukraine and six proxy officials. U.S. Department of the Treasury, “U.S. Treasury Sanctions Nearly 100 Targets in Putin’s War Machine, Prohibits Russian Gold Imports,” press release, June 28, 2022.

Designees also include the following:

- longtime friends and colleagues of President Putin, as well as heads and executives of strategic state-owned or state-connected firms (often referred to as *oligarchs*);
- entities and related individuals in defense and technology, energy, financial services (including Russia's largest banks), metals and mining, transportation, and other sectors of the Russian economy;
- foreign facilitators of sanctions evasion, including in China, Cyprus, the Kyrgyz Republic, Switzerland, Turkey, the United Arab Emirates, and elsewhere;
- individuals and entities involved in the "research, development, production, and procurement" of unmanned aerial vehicles (UAVs, or drones) that Iran has supplied to Russia (under E.O.s 12938 and 13382, targeting proliferators of weapons of mass destruction [WMD] and their supporters),⁵¹ and
- individuals and entities involved in the transfer of munitions and ballistic missiles from North Korea to Russia (some under North Korea-related authorities).

With respect to the four Ukraine-related E.O.s that President Obama issued in 2014, about 520 individuals, entities, aircraft, and vessels currently are designated (several dozen of these also have been designated under E.O. 14024 or E.O. 14065). OFAC has drawn on E.O. 13660 to designate individuals and entities for their roles in destabilizing and invading Ukraine starting in 2014. Designees mainly include former Ukrainian officials (e.g., ex-President Viktor Yanukovich), occupation authorities in occupied Crimea and eastern Ukraine, Russia-based fighters and patrons, and associated companies or organizations.

OFAC has drawn on E.O. 13661 (and, in some cases, E.O. 13662) to designate members of the Russian government, economic elites and associated companies, and defense-related entities. OFAC has drawn on E.O. 13685 to designate primarily Russian or Crimea-based companies and subsidiaries that operate in occupied Crimea.

Among sanctions designees are 31 of 103 Russian billionaires, as assessed by *Forbes* in 2023, including 25 of the top 50.⁵² Since February 2022, 29 of these individuals have been designated under E.O. 14024 (including 8 who were previously designated). Ten Russian billionaires were designated prior to 2022 under E.O. 13661 or E.O. 13662.

Under E.O. 14024, E.O. 13661, or E.O. 13662 (and sometimes simultaneously, pursuant to other authorities), some officials and state-connected individuals and entities have been designated in response to other Russian activities, including malign influence operations worldwide and the poisoning and imprisonment of the late Russian opposition figure Alexei Navalny (see "Human Rights Abuses and Corruption" and "Poisoning of Alexei Navalny" below).

⁵¹ E.O. 12938 of November 14, 1994, "Proliferation of Weapons of Mass Destruction," 59 *Federal Register* 59099, November 16, 1994; and E.O. 13382 of June 28, 2005, "Blocking Property of Weapons of Mass Destruction Proliferators and Their Supporters," 70 *Federal Register* 38567, July 1, 2005. Also see CRS Insight IN12042, *Iran's Transfer of Weaponry to Russia for Use in Ukraine*, by Andrew S. Bowen, Carla E. Humud, and Clayton Thomas.

⁵² *Forbes*, "The World's Billionaires," 2023.

Table I. Specially Designated Nationals (SDNs) Related to Russia's Invasion of Ukraine

(authorities, targets, and Treasury designees)

Authorities	Targets	Designations (as of 4/24/2024)
Executive Order (E.O.) 14024	Those responsible for or who have engaged in specified "harmful foreign activities" on behalf of the Russian government; Russian government entities and officials; persons determined to be operating in the technology sector or the defense and related materiel sector of the Russian economy or any other sector of the Russian economy as may be determined.	1,481 individuals, 2,360 entities, 98 aircraft, 208 vessels
E.O. 14065	Those the President determines have operated in, or been the leader of an entity operating in, the occupied "Donetsk People's Republic" and "Luhansk People's Republic" or others as determined. The E.O. also prohibits U.S. business, trade, or investment in those regions.	6 individuals, 2 entities
E.O. 13660; Countering Russian Influence in Europe and Eurasia Act of 2017 (CRIIEA; P.L. 115-44, Title II; 22 U.S.C. 9501 et seq.)	Those responsible for undermining Ukraine's democracy; threatening its peace, security, stability, sovereignty, or territorial integrity; misappropriating assets; and/or illegally asserting government authority.	129 individuals, 25 entities
E.O. 13661; P.L. 115-44	Russian government officials; those operating in Russia's arms or related materiel sector; entities owned or controlled by a senior Russian government official; those acting on behalf of, or materially assisting or supporting, a senior Russian government official.	110 individuals, 79 entities, 5 aircraft, 3 vessels
E.O. 13662; P.L. 115-44	Entities and individuals operating in specified sectors of the Russian economy. Subsequent Treasury determinations specify the financial services, energy, and defense sectors.	6 individuals, 13 entities
E.O. 13685; P.L. 115-44	Those the President determines have operated in, or been the leader of an entity operating in, occupied Crimea. The E.O. also prohibits U.S. business, trade, or investment in occupied Crimea.	76 entities, 17 individuals, 1 aircraft, 7 vessels
Support for the Sovereignty, Integrity, Democracy, and Economic Stability of Ukraine Act of 2014 (SSIDES; P.L. 113-95, as amended by P.L. 115-44 (§228); 22 U.S.C. 8910	Those responsible for serious human rights abuses in territory forcibly occupied or controlled by Russia.	2 individuals, 1 entity

Source: U.S. Department of the Treasury, Office of Foreign Assets Control (OFAC); Congressional Research Service (CRS).

Notes: The total number of SDNs under the initial four 2014 Ukraine-related E.O.s (13660, 13661, 13662, 13685) is 461 (some have been designated under more than one of the E.O.s). Several dozen of these SDNs also have been listed under E.O. 14024; two have been listed under E.O. 14065.

Non-SDN Lists

In addition to designating individuals and entities for sanctions, OFAC imposes other sanctions on certain Russian entities it includes on two of its non-SDN lists: the Sectoral Sanctions Identification (SSI) List and the Non-SDN Menu-Based Sanctions (NS-MBS) List.

Pursuant to E.O. 14024, OFAC restricts U.S. persons from engaging in transactions with the Bank of Russia (Russia's central bank), thereby immobilizing its foreign reserves that are under U.S. jurisdiction, as well as with Russia's National Wealth Fund and Ministry of Finance.⁵³ OFAC has placed these entities on the NS-MBS List but has not designated them as SDNs.

Also pursuant to E.O. 14024, OFAC has prohibited U.S. financial institutions from participating in the secondary market for Russia's ruble or non-ruble denominated sovereign bonds (OFAC previously prohibited participation in the primary sovereign debt market for ruble and non-ruble denominated bonds; see "CBW Act Sanctions" below).⁵⁴

Pursuant to E.O. 13662, individuals and entities under U.S. jurisdiction also are restricted from engaging in specific transactions with entities on the SSI List, which OFAC identifies as subject to one of four directives issued to implement the details of the E.O. SSI restrictions apply to new equity investment and financing (other than short-term [14-day] lending) for listed entities in Russia's financial sector (Directive 1); new financing (other than 60-day lending) for listed entities in Russia's energy sector (Directive 2); and new financing (other than 30-day lending) for listed entities in Russia's defense sector (Directive 3).⁵⁵ A fourth directive prohibits U.S. trade with listed entities related to the development of deepwater, Arctic offshore, or shale projects that have the potential to produce oil, including such projects worldwide in which those entities have an ownership interest of at least 33% or a majority of voting interests.⁵⁶

OFAC has placed 13 major Russian companies and more than 275 of their subsidiaries and affiliates on the SSI List. The SSI List includes major state-owned companies in the financial, energy, and defense sectors; it does not include all companies in those sectors. Some companies on the SSI list subsequently have been designated as SDNs.

Separately, pursuant to E.O. 14024, individuals and entities under U.S. jurisdiction are restricted from engaging in specific transactions with 13 major Russian companies on the NS-MBS List, which OFAC identifies as subject to Directive 3 under the E.O. Restrictions apply to new equity investment and financing (other than 14-day lending).⁵⁷ Listed entities include Gazprom, a state-owned energy company and Russia's largest firm (OFAC has not designated Gazprom as an SDN). Some of the listed entities also are on the SSI List or are designated as SDNs.

Export Controls

In addition to sanctions, the United States has used export controls—which control the possible end use of items—in response to Russia's invasion of Ukraine. The Department of Commerce administers export controls, guided by the Export Controls Act of 2018 (Title XVII, Subtitle B, Part I, of the John S. McCain National Defense Act of Fiscal Year 2019 [P.L. 115-232]) and

⁵³ OFAC, "Publication of Financial Services Sectoral Determination and Directives 1A, 2, 3, and 4 Under Executive Order 14024 of April 15, 2021," 87 *Federal Register* 32303, May 31, 2022.

⁵⁴ *Ibid.*

⁵⁵ Directive 1 has been amended twice to narrow lending windows, and Directive 2 has been amended once. Directives are available at OFAC, "Ukraine-/Russia-Related Sanctions Regulations," 87 *Federal Register* 26094, May 2, 2022.

⁵⁶ Directive 4 has been amended once to apply to projects outside the Russian Federation. *Ibid.*

⁵⁷ See footnote 53.

related legislation. The Export Controls Act states that it is the policy of the United States to control the export, reexport, and transfer of items and related activities in furtherance of U.S. foreign policy and national security and to fulfill the United States' "declared international obligations."⁵⁸ The act also elaborates areas of particular concern for U.S. national security—among them, weapons proliferation, terrorism, destabilizing foreign military programs, and interference with critical infrastructure—for which the Department of Commerce may control the export, reexport, or transfer of items and related activities.

Expanding on previous export controls on Russia, in February 2022, the Department of Commerce's BIS implemented what it characterized as "a sweeping series of stringent export controls that [would] severely restrict Russia's access to technologies and other items that it needs to sustain its aggressive military capabilities."⁵⁹ Initial controls affected export licensing for materiel used in the defense, aerospace, and maritime sectors. Over the following months, BIS added Russia and Belarus as jurisdictions subject to Foreign Direct Product Rules, which restrict trade in U.S.-origin goods and technology through third markets or jurisdictions.⁶⁰ BIS also expanded export controls affecting oil refineries, luxury goods, commercial and private aircraft, goods intended for military modernization, software, dual-use items, construction materials and machinery, and more. In February 2024, BIS stated that it had placed on the Entity List more than 900 entities from Russia and other countries "for their role in Putin's full-scale invasion of Ukraine."⁶¹

Effective March 21, 2024, BIS applies end-user export controls on all those designated by OFAC under its Russian harmful foreign activities and Ukraine sanctions programs (the latter mainly related to Russian activities prior to 2022), as well as its Belarus sanctions program.⁶²

Other Sanctions Related to Russia's War Against Ukraine

Through February 2024, the Secretary of State has announced visa restrictions on several thousand Russian officials and military personnel pursuant to Immigration and Nationality Act authorities that govern admission of foreign nationals into the United States or Section 7031(c) of the annual Department of State, Foreign Operations, and Related Programs appropriations act. These visa bans are in addition to those that may be imposed on SDNs.⁶³

⁵⁸ P.L. 115-232, §1752; 50 U.S.C. 4811. "Declared international obligations" would be those commitments undertaken when acceding to a treaty or executive agreement, for example. As a result, the proliferation of conventional weapons and weapons of mass destruction, related delivery systems, and the materials that go into making such weaponry dominate the use of export controls in U.S. foreign policy and national security.

⁵⁹ BIS, "Commerce Implements Sweeping Restrictions on Exports to Russia in Response to Further Invasion of Ukraine," press release, February 24, 2022.

⁶⁰ BIS, "Implementation of Sanctions Against Russia Under the Export Administration Regulations (EAR)," 87 *Federal Register* 12226, March 3, 2022; and "Implementation of Sanctions Against Belarus Under the Export Administration Regulations (EAR)," 87 *Federal Register* 13048, March 8, 2022 (final rule affecting 15 C.F.R. Parts 734, 738, 740, 742, 744, 746, and 772, effective February 24, 2022, for Russia, and March 2, 2022, for Belarus).

⁶¹ BIS, "Commerce Stands Strong with Ukraine, Takes Further Action Against Ongoing Russian Aggression," press release, February 23, 2024.

⁶² BIS, "Export Administration Regulations End-User Controls: Imposition of Restrictions on Certain Persons Identified on the List of Specially Designated Nationals and Blocked Persons (SDN List)," 89 *Federal Register* 20107, March 21, 2024.

⁶³ In the Immigration and Nationality Act, see especially §212(a)(3)(C) relating to declaring a foreign national inadmissible for foreign policy reasons (8 U.S.C. 1182). For more on §7031(c), relating to corruption and human rights-related exclusions (8 U.S.C. 1182 note), see "Human Rights Abuses and Corruption" below.

In March 2022, the Department of Transportation and the Federal Aviation Administration issued orders blocking Russian aircraft and airlines from entering and using all domestic U.S. airspace.⁶⁴ In April 2022, and extended in April 2023, President Biden issued a proclamation based on legislative authority prohibiting Russian-affiliated vessels from entering into U.S. ports.⁶⁵

Malicious Cyber-Enabled Activities

Sanctions Authorities

The executive branch draws on national emergency authorities and other legislation to impose sanctions to deter, alter, and counter a range of malicious cyber-enabled activities in the United States or elsewhere, including activities the United States has attributed to the Russian government. The relevant authorities are as follows:

E.O. 13694, as amended by E.O. 13757. On April 1, 2015, President Obama issued E.O. 13694, invoking national emergency authorities to declare that “the increasing prevalence and severity of malicious cyber-enabled activities originating from, or directed by persons located ... outside the United States, constitute an unusual and extraordinary threat.” E.O. 13694 targets those who engage in cyberattacks (1) against critical infrastructure, (2) for financial or commercial gain, or (3) to significantly disrupt the availability of a computer or network.⁶⁶

On December 28, 2016, President Obama issued E.O. 13757, which amended E.O. 13694 to establish sanctions against those engaged in “tampering with, altering, or causing a misappropriation of information with the purpose or effect of interfering with or undermining election processes or institutions.”⁶⁷

Nine days after President Obama issued E.O. 13757, the Office of the Director of National Intelligence released an unclassified intelligence community assessment on Russian activities and intentions related to the 2016 U.S. presidential election. The assessment stated that the Central Intelligence Agency, the Federal Bureau of Investigation, and the National Security Agency had “high confidence” that President Putin had “ordered an influence campaign in 2016 aimed at the U.S. presidential election.”⁶⁸

CRIEEA, Section 224. CRIEEA, enacted in August 2017, codified E.O. 13694, as amended, and, in Section 224, expanded the scope of cyber-related activities subject to sanctions to include a

⁶⁴ U.S. Department of Transportation, “U.S. Will Block Russian Aircraft from Using All Domestic Airspace,” press release, March 1, 2022.

⁶⁵ Proclamation 10371 of April 21, 2022, “Declaration of National Emergency and Invocation of Emergency Authority Relating to the Regulation of the Anchorage and Movement of Russian-Affiliated Vessels to United States Ports,” 87 *Federal Register* 24265, April 22, 2022. The proclamation is based on the NEA (50 U.S.C. 1601 et seq.) and Section 1 of the Magnuson Act (P.L. 65-24; 46 U.S.C. 70051); it requires annual renewal under NEA terms.

⁶⁶ E.O. 13694 did not target a specific state, entity, or individual. President Obama issued the E.O. four months after a cyberattack against Sony Pictures, which the U.S. intelligence community assessed had originated in North Korea, and 10 months after the U.S. Department of Justice indicted several Chinese military officers for cyber-related espionage. E.O. 13694 of April 1, 2015, “Blocking the Property of Certain Persons Engaging in Significant Malicious Cyber-Enabled Activities,” 80 *Federal Register* 18077, April 2, 2015. E.O. 13694, as amended, must be extended annually to remain in force; the President extended it most recently on March 26, 2024 (89 *Federal Register* 21427).

⁶⁷ E.O. 13757 of December 28, 2016, “Taking Additional Steps to Address the National Emergency with Respect to Significant Malicious Cyber-Enabled Activities,” 82 *Federal Register* 1, January 3, 2017.

⁶⁸ Office of the Director of National Intelligence, *Assessing Russian Activities and Intentions in Recent U.S. Elections*, Intelligence Community Assessment 2017-01D, January 6, 2017.

range of activities conducted on behalf of the Russian government that undermine “cybersecurity against any person, including a democratic institution, or government.”⁶⁹

CRIEEA, Section 231. CRIEEA, Section 231, also responds to malicious cyber-enabled activities by requiring sanctions against those who engage in “significant transactions” with the Russian defense or intelligence sectors, including arms sales.⁷⁰ In addition, Section 231 requires the executive branch to “specify the persons that are part of, or operate for or on behalf of, [Russia’s] defense and intelligence sectors.”⁷¹ Persons “determined to knowingly engage in a significant transaction with those identified on the CAATSA [CRIEEA] 231 List of Specified Persons are subject to five or more sanctions described in Section 235 of CAATSA.”⁷²

E.O. 13848. On September 12, 2018, President Trump issued E.O. 13848, invoking new national emergency authorities to declare that “the ability of persons located ... outside the United States to interfere in or undermine public confidence in United States elections, including through the unauthorized accessing of election and campaign infrastructure or the covert distribution of propaganda and disinformation, constitutes an unusual and extraordinary threat.”⁷³ E.O. 13848 states that “the proliferation of digital devices and internet-based communications has created significant vulnerabilities and magnified the scope and intensity of the threat of foreign interference.” In addition, it states that “there has been no evidence of a foreign power altering the outcome or vote tabulation in any United States election.”

E.O. 13848 authorizes sanctions against foreign individuals and entities that have “directly or indirectly engaged in, sponsored, concealed or otherwise been complicit in foreign interference in a United States election.” The E.O. requires the Director of National Intelligence to make an initial assessment regarding foreign interference within 45 days of an election and the Attorney General and Secretary of Homeland Security to issue a second report regarding the impact of such interference on election and campaign infrastructure within another 45 days.⁷⁴ In addition,

⁶⁹ The Countering Russian Influence in Europe and Eurasia Act of 2017, as amended (CRIEEA; P.L. 115-44, Title II, §224; 22 U.S.C. 9524(d)) defines these activities to include the following:

(1) significant efforts—(A) to deny access to or degrade, disrupt, or destroy an information and communications technology system or network; or (B) to exfiltrate, degrade, corrupt, destroy, or release information from such a system or network without authorization for purposes of—(i) conducting influence operations; or (ii) causing a significant misappropriation of funds, economic resources, trade secrets, personal identifications, or financial information for commercial or competitive advantage or private financial gain; (2) significant destructive malware attacks; and (3) significant denial of service activities.

⁷⁰ 22 U.S.C. 9525. §231(b)(2) authorizes the President to waive sanctions if the President certifies “that the Government of the Russian Federation has made significant efforts to reduce the number and intensity of cyber intrusions conducted by that Government.” As amended, Section 231(d) also authorizes the President to waive the imposition of sanctions if the President certifies that a transaction would not (1) be with an entity that directly participated in or facilitated cyber intrusions, (2) endanger the United States’ multilateral alliances or ongoing operations, (3) increase the risk of compromising U.S. defense systems, or (4) negatively impact defense cooperation with the country in question. The President also must certify that the country is taking steps to reduce the share of Russian-produced arms and equipment in its total inventory or is cooperating with the United States on other matters critical to U.S. national security.

⁷¹ U.S. Department of State, “CAATSA Section 231(e) Defense and Intelligence Sectors of the Government of the Russian Federation.”

⁷² OFAC, “Russian Harmful Foreign Activities Sanctions FAQ 1092,” updated October 14, 2022, <https://ofac.treasury.gov/faqs/1092>.

⁷³ E.O. 13848 of September 12, 2018, “Imposing Certain Sanctions in the Event of Foreign Interference in a United States Election,” 83 *Federal Register* 46843, September 14, 2018. E.O. 13848 must be extended annually to remain in force; the President extended it most recently on September 7, 2023 (88 *Federal Register* 62437).

⁷⁴ The FY2020 National Defense Authorization Act (P.L. 116-92, §5304(a)(1); 50 U.S.C. 3371) includes a separate (continued...)

the E.O. requires the Secretary of State and the Secretary of the Treasury to recommend to the President the appropriateness of additional sanctions, including against the largest business entities of the country determined to have interfered in elections, including at least one each from the financial services, defense, energy, technology, and transportation sectors.

E.O. 14024. Among the “harmful foreign activities” E.O. 14024 specifies are malicious cyber-enabled activities, election interference, and the undermining of democratic processes or institutions on behalf of the Russian government.⁷⁵

Related Actions

U.S. Election Interference and Global Influence Operations

Under one or more of the above-mentioned authorities, the United States has designated at least 76 individuals and related entities, vessels, and aircraft for activities related to Russian interference in U.S. elections or political influence operations targeting the United States. Several of the designated individuals also have been indicted by the Department of Justice for related crimes. These designations include the following:

- Russia’s leading intelligence agency (Federal Security Service, or FSB), military intelligence agency (Main Intelligence Directorate, or GRU), intelligence officers or associates, and related companies.⁷⁶ Nine GRU officers were indicted by the Department of Justice Special Counsel’s Office for crimes related to election interference.⁷⁷
- The Internet Research Agency (IRA), its employees, alleged financial backer Yevgeny Prigozhin (now deceased), associated companies, and aircraft and a yacht formerly owned by Prigozhin, in response to interference in U.S. presidential elections in 2016 or midterm elections in 2018. Most of these individuals were indicted previously by the Department of Justice Special Counsel’s Office for related crimes.⁷⁸
- Six designees “related to Project Lakhta, a broad Russian effort that includes the IRA.”⁷⁹ The designees included an individual whom the Department of Justice

requirement for the Director of National Intelligence, in coordination with the Under Secretary of Homeland Security for Intelligence and Analysis and the Director of the Federal Bureau of Investigation, to “make publicly available on an internet website an advisory report on foreign counterintelligence and cybersecurity threats to campaigns of candidates for Federal office.”

⁷⁵ See “Sanctions Introduced After Russia’s 2022 Full-Scale Invasion of Ukraine,” above, and footnote 32 for the other “harmful foreign activities” listed in E.O. 14024.

⁷⁶ In 2016, the Administration also denied Russian officials access to two Russian government-owned compounds, located in Maryland and New York, which President Obama said Russia was using for intelligence-related purposes. White House, “Fact Sheet: Actions in Response to Russian Malicious Cyber Activity and Harassment,” December 29, 2016. For more on Russian intelligence agencies and their cyber operations, see CRS Report R46616, *Russian Military Intelligence: Background and Issues for Congress*, by Andrew S. Bowen, and CRS In Focus IF11718, *Russian Cyber Units*, by Andrew S. Bowen.

⁷⁷ U.S. Department of Justice, “Grand Jury Indicts 12 Russian Intelligence Officers for Hacking Offenses Related to the 2016 Election,” press release, July 13, 2018.

⁷⁸ For the Special Counsel’s indictment, see U.S. Department of Justice, “Grand Jury Indicts Thirteen Russian Individuals and Three Russian Companies for Scheme to Interfere in the United States Political System,” press release, February 16, 2018.

⁷⁹ U.S. Department of the Treasury, “Treasury Targets Russian Operatives over Election Interference, World Anti-Doping Agency Hacking, and Other Malign Activities,” press release, December 19, 2018.

- charged for conspiracy to defraud the United States related to efforts “to interfere in the U.S. political system, including the 2018 midterm election.”⁸⁰
- A member of the Ukrainian parliament, as well as other individuals and entities in Ukraine that OFAC determined were “part of a Russia-linked foreign influence network,” in response to efforts to interfere in the 2020 U.S. presidential election.⁸¹
 - Other Russian individuals and entities for “attempt[ing] to influence the 2020 U.S. presidential election at the direction of the leadership of the Russian government.”⁸²

OFAC also has imposed sanctions on Russian intelligence-controlled outlets and related individuals for global disinformation activities, as well as for influence and disinformation operations specifically targeting Ukraine, Moldova, the Balkans, and the UK. In 2018, OFAC designated four GRU officers for cyber operations against the World Anti-Doping Agency and the Organization for the Prohibition of Chemical Weapons.⁸³

Prigozhin Network

Since 2016, OFAC has imposed sanctions on a global network of individuals and entities linked to now-deceased Russian financier Yevgeny Prigozhin. Prigozhin was killed in an August 2023 aircraft explosion that some observers maintain was an act of assassination ordered by senior Russian officials after Prigozhin led a short-lived mutiny two months earlier.⁸⁴ In addition to the above-mentioned sanctions for U.S. election interference, OFAC has applied sanctions to Prigozhin, two of his companies, and the Prigozhin-financed Wagner Group paramilitary organization and its now-deceased leader for activities related to Russia’s invasion of Ukraine. In January 2023, OFAC designated the Wagner Group as a Transnational Criminal Organization (TCO).⁸⁵ OFAC has applied sanctions to other Prigozhin-linked individuals and entities involved in paramilitary, economic, and political influence operations in Sudan, the Central African Republic, Mali, and elsewhere, as well as for sanctions evasion and identity fraud.

⁸⁰ U.S. Department of Justice, “Russian National Charged with Interfering in U.S. Political System,” press release, October 19, 2018.

⁸¹ The Department of the Treasury characterized the designated member of the Ukrainian parliament as “an active Russian agent for over a decade.” U.S. Department of the Treasury, “Treasury Sanctions Russia-linked Election Interference Actors,” press release, September 10, 2021; and U.S. Department of the Treasury, “Treasury Takes Further Action Against Russian-Linked Actors,” press release, January 11, 2022.

⁸² U.S. Department of the Treasury, “Treasury Escalates Sanctions Against the Russian Government’s Attempts to Influence U.S. Elections,” press release, April 15, 2021.

⁸³ These officers also were indicted by the Department of Justice for related crimes. U.S. Department of Justice, “U.S. Charges Russian GRU Officers with International Hacking and Related Influence and Disinformation Operations,” press release, October 4, 2018.

⁸⁴ The United States generally maintains sanctions on a deceased person until the disposition of assets of that person’s estate is completed. Michael R. Gordon et al., “Early Intelligence Suggests Prigozhin Was Assassinated, U.S. Officials Say,” *Wall Street Journal*, August 24, 2023; Nandita Bose and Steve Holland, “White House Suggests Kremlin Behind Prigozhin Death,” Reuters, August 29, 2023; and Thomas Grove, Alan Cullison, and Bojan Pancevski, “How Putin’s Right-Hand Man Took Out Prigozhin,” *Wall Street Journal*, December 22, 2023. On the mutiny, see CRS Insight IN12186, *Wagner Group Mutiny in Russia*, by Andrew S. Bowen.

⁸⁵ U.S. Department of the Treasury, “Treasury Sanctions Russian Proxy Wagner Group as a Transnational Criminal Organization,” press release, January 26, 2023.

Other Malicious Cyber-Enabled and Intelligence Activities

OFAC has designated individuals and entities for other malicious Russian cyber-enabled activities, mainly under E.O. 13694, as amended. Sanctions have targeted Russian intelligence agencies and officers and intelligence-affiliated companies for conducting or supporting cyberattacks, including the 2017 “NotPetya” ransomware attack that the Department of the Treasury called “the most destructive and costly cyberattack in history” and the 2020 SolarWinds cyberattack that compromised victims in “the financial sector, critical infrastructure, government networks, and many others.”⁸⁶ Sanctions also have targeted individuals and entities that have facilitated intelligence activities and sanctions evasion for the FSB and other Russian intelligence services. Under E.O. 13694, OFAC also has designated nongovernmental individuals and entities for financial cybercrimes, including the use of ransomware, and for facilitating financial transactions for cybercriminals, including through the use of virtual currency exchanges.⁸⁷

Arms Sales

OFAC has imposed Section 231 sanctions (against those who engage in “significant transactions” with the Russian defense or intelligence sectors) in response to significant arms purchases by two countries: China and Turkey. In 2018, the Equipment Development Department of China’s Central Military Commission, as well as its director, was designated for taking delivery of 10 Su-35 combat aircraft in 2017 and S-400 surface-to-air missile system-related equipment in 2018. In 2020, the head of Turkey’s Presidency of Defense Industries and related officers were designated for taking delivery of S-400 surface-to-air missile system-related equipment. In addition, five non-SDN sanctions, pursuant to CRIEEA, were imposed on the Presidency of Defense Industries.⁸⁸

Human Rights Abuses and Corruption

Sanctions Authorities

In December 2012, Congress passed and President Obama signed into law the Sergei Magnitsky Rule of Law Accountability Act of 2012 (hereinafter the Sergei Magnitsky Act).⁸⁹ Sergei Magnitsky was a Russian tax adviser who died in prison in 2009 after uncovering massive tax fraud that allegedly implicated government officials. The act entered into law as part of a broader piece of legislation related to U.S.-Russia trade relations.

⁸⁶ U.S. Department of the Treasury, “Treasury Sanctions Russian Cyber Actors for Interference with the 2016 U.S. Elections and Malicious Cyber-Attacks,” press release, March 15, 2018; and U.S. Department of the Treasury, “Treasury Sanctions Russia with Sweeping New Sanctions Authority,” press release, April 15, 2021.

⁸⁷ In addition, the Department of the Treasury’s Financial Crimes Enforcement Network (FinCEN) has identified one virtual currency exchange (Bitzlato Limited) as a “primary money laundering concern in connection with Russian illicit finance” under §9714 of the Combatting Russian Money Laundering Act, as amended (P.L. 116-283, Division H, Title XCVII, Subtitle B; 31 U.S.C. 5318A note). FinCEN imposed a “special measure” prohibiting covered financial institutions from engaging in a transmittal of funds related to Bitzlato. FinCEN, “Imposition of Special Measure Prohibiting the Transmittal of Funds Involving Bitzlato,” 88 *Federal Register* 3919, January 23, 2023.

⁸⁸ Section 231 of CRIEEA requires the President to impose at least 5 of 12 sanctions described in §235 on individuals and entities that the President determines have engaged in significant transactions with Russia’s defense or intelligence sector.

⁸⁹ The act was enacted as Title IV of the Russia and Moldova Jackson-Vanik Repeal and Sergei Magnitsky Rule of Law Accountability Act of 2012 (P.L. 112-208; 22 U.S.C. 5811 note). “Jackson-Vanik” refers to provisions in the Trade Act of 1974 that conditioned U.S. trade with the Soviet Union on that country’s emigration policies (P.L. 93-618, §402; 19 U.S.C. 2432).

The Sergei Magnitsky Act requires the President to impose sanctions on those the President identifies as having been involved in the “criminal conspiracy” that Magnitsky uncovered and in his subsequent detention, abuse, and death.⁹⁰ The act also requires the President to impose sanctions on those the President finds have committed gross violations of internationally recognized human rights against individuals fighting to expose the illegal activity of Russian government officials or seeking to exercise or defend human rights and freedoms in Russia.

Subsequently, in December 2016, the Global Magnitsky Human Rights Accountability Act (Global Magnitsky Act; P.L. 114-328, Title XII, Subtitle F; 22 U.S.C. 10101 et seq.) was enacted.⁹¹ This act authorizes the President to apply globally the human rights sanctions authorities aimed at the treatment of whistleblowers and human rights defenders that were originally set out in the Sergei Magnitsky Act. The Global Magnitsky Act also authorizes the President to impose sanctions against government officials and associates around the world responsible for acts of significant corruption.

In December 2017, President Trump issued E.O. 13818 to implement the Global Magnitsky Act, in the process expanding the target for sanctions to include those who commit any “serious human rights abuse” around the world, not just gross human rights violations against whistleblowers and human rights defenders.⁹²

SSIDES, as amended by CRIEEA in 2017, provides for sanctions on those responsible for “the commission of serious human rights abuses in any territory forcibly occupied or otherwise controlled” by the Russian government, as well as on Russian government officials and associates responsible for acts of significant corruption worldwide.⁹³

In FY2008, Congress began including a requirement in annual State Department and Foreign Operations Appropriations Acts (referred to as Section 7031(c) authorities) that the Secretary of State shall deny entry into the United States to any foreign official found to be involved in the corrupt extraction of natural resources. This provision gradually was broadened to require the denial of entry of foreign government officials and their immediate family members for whom there is credible information that the individual has been involved, “directly or indirectly, in significant corruption ... or a gross violation of human rights.”⁹⁴ Under Section 7031(c) authorities, the State Department has publicly designated Russian nationals for human rights abuses in Russia, as well as for actions related to the war in Ukraine, as discussed above (see “Sanctions Introduced After Russia’s 2022 Full-Scale Invasion of Ukraine”).

⁹⁰ Sergei Magnitsky Act, §404(a)(1).

⁹¹ For more, see CRS In Focus IF10576, *The Global Magnitsky Human Rights Accountability Act*, by Michael A. Weber and Edward J. Collins-Chase.

⁹² E.O. 13818 of December 20, 2017, “Blocking the Property of Persons Involved in Serious Human Rights Abuse or Corruption,” 82 *Federal Register* 60839, December 26, 2017. E.O. 13818 must be extended annually to remain in force; the President extended it most recently on December 19, 2023 (88 *Federal Register* 87891).

⁹³ CRIEEA, §§227-228; 22 U.S.C. 8910.

⁹⁴ Most recently, §7031(c) of the Department of State, Foreign Operations, and Related Programs Appropriations Act, 2024 (P.L. 118-47, Division F; 8 U.S.C. 1182 note). The annual provision also authorizes referral to OFAC for possible additional economic restrictions. The act provides that visa denials may be announced publicly or kept confidential. §7031(c)(3) authorizes the Secretary of State to waive designating an individual if the Secretary determines “that the waiver would serve a compelling national interest or that the circumstances which caused the individual to be ineligible [to enter the United States] have changed sufficiently.” For more, see CRS In Focus IF10905, *FY2020 Foreign Operations Appropriations: Targeting Foreign Corruption and Human Rights Violations*, by Liana W. Rosen and Michael A. Weber.

Related Actions

As of December 2023, 62 individuals and two entities were designated pursuant to the Sergei Magnitsky Act. Forty-one designees are directly associated with the alleged crimes that Magnitsky uncovered or his subsequent ill-treatment and death. Seventeen individuals and two entities are designated for human rights violations and killings in Russia's Chechen Republic; the 2004 killing of Paul Klebnikov, the American chief editor of the Russian edition of *Forbes*; the 2006 killing of former Russian spy Alexander Litvinenko in London; and prison abuse in one Russian region.⁹⁵ In 2023, OFAC redesignated pursuant to the Sergei Magnitsky Act four individuals for their alleged involvement in the 2020 poisoning of Russian opposition figure Alexei Navalny, who died in February 2024 while incarcerated in an Arctic penal colony (on Navalny's poisoning, see "Poisoning of Alexei Navalny" below).

Separately, the Department of the Treasury has imposed sanctions on 10 Russian government officials, including the FSB director, Russia's prosecutor general, and penitentiary service officials for Navalny's poisoning, imprisonment, or death. These sanctions were imposed under E.O. 13661 (targeting Russian government officials in response to Russia's 2014 invasion of Ukraine) or E.O. 14024 (and, in the case of the FSB director, also E.O. 13382, targeting WMD proliferators).

Under the Global Magnitsky Act, OFAC has designated at least 21 Russian individuals and entities.⁹⁶ Among the first round of Global Magnitsky designations was the son of Russia's then-prosecutor general, who was cited for alleged involvement in high-level corruption. Subsequently, OFAC designated the head of Russia's Chechen Republic and 11 related individuals and entities for serious human rights abuses; 3 Russian officials involved in the arbitrary detention of opposition figure Vladimir Kara-Murza; and a Russian national and related entities for corrupt activities in Guatemala.⁹⁷

In 2018, President Trump cited SSIDES, as amended by CRIIEA, Section 228, to designate two individuals and one entity for committing serious human rights abuses in territories forcibly occupied or controlled by Russia.

OFAC has not imposed sanctions on Russian individuals for acts of significant corruption pursuant to SSIDES, as amended by CRIIEA, Section 227. In 2018, however, OFAC designated several politically connected Russian billionaires (whom the Department of the Treasury referred to as oligarchs) and related companies under Ukraine-related emergency authorities. The Department of the Treasury stated that "Russian oligarchs and elites who profit from [a] corrupt

⁹⁵ On the killing of Paul Klebnikov, see Richard Behar, "Open Letter to Russia's Putin on Tenth Anniversary of Forbes' Editor Paul Klebnikov's Murder: Why Haven't You Solved It?," *Forbes*, July 16, 2014; and Bermet Talant, "American Journalist Paul Klebnikov's Alleged Killer Arrested in Kyiv," *Kyiv Post*, November 19, 2017. On the killing of Alexander Litvinenko, see Alex Goldfarb with Marina Litvinenko, *Death of a Dissident: The Poisoning of Alexander Litvinenko and the Return of the KGB* (New York: Free Press, 2007); and Luke Harding, *A Very Expensive Poison: The Assassination of Alexander Litvinenko and Putin's War with the West* (New York: Vintage Books, 2017).

⁹⁶ In all, 235 individuals, 302 entities, and 157 vessels currently are designated pursuant to the Global Magnitsky Act. For more, see the U.S. Department of State's *Global Magnitsky Human Rights Accountability Act Annual Report* (for 2023, see 89 *Federal Register* 13795, February 23, 2024); and U.S. Department of State, "The Global Magnitsky Sanctions Program," <https://www.state.gov/global-magnitsky-act/>.

⁹⁷ Treasury also has designated under the Global Magnitsky Act a former Ukrainian special police force commander with dual Ukrainian-Russian citizenship; he was designated for violence against protesters in Ukraine.

system will no longer be insulated from the consequences of their government's destabilizing activities."⁹⁸

In imposing sanctions on Russian elites since 2022, the Biden Administration has cited linkages between Russian elites' personal enrichment and Russia's war against Ukraine. On February 24, 2022, the U.S. Department of the Treasury stated that sanctions in response to Russia's invasion would target, among others, individuals "believed to participate in, or benefit from, the Russian regime's kleptocracy, along with their family members."⁹⁹ On March 2, the Treasury Department added that new sanctions would target "elites [who] continue to provide direct and indirect support to the Government of the Russian Federation ... through their business empires, wealth, and other resources. The aid of these individuals, their family members, and other key elites allows President Vladimir Putin to continue to wage the ongoing, unprovoked invasion of Ukraine."¹⁰⁰

In subsequent statements, the Treasury Department referred to particular sanctions designees as "associates and facilitators of the Russian regime" and those "who have personally enriched themselves while facilitating Putin's war in Ukraine."¹⁰¹ The Treasury Department also stated it would "expose the schemes by which Russian politicians hide their wealth."¹⁰²

Use of a Chemical Weapon

CBW Act Sanctions

The Chemical and Biological Weapons Control and Warfare Elimination Act of 1991 (CBW Act; P.L. 102-182, Title III; 22 U.S.C. 5601 et seq.) provides for sanctions against the government of a foreign country that the Secretary of State determines has used a chemical weapon in contravention of international law or against its own nationals.

When such a finding is made, the CBW Act first requires the President (delegating authority to the Secretary of State) to, forthwith,

- Terminate foreign assistance other than that which addresses urgent humanitarian situations or provides food or other agricultural products;
- Terminate arms sales;
- Terminate export licenses for U.S. Munitions List items;
- Terminate foreign military financing;
- Deny credit, credit guarantees, or other financial assistance from the U.S. government, including Export-Import Bank programs; and

⁹⁸ U.S. Department of the Treasury, "Treasury Designates Russian Oligarchs, Officials, and Entities in Response to Worldwide Malign Activity," press release, April 6, 2018.

⁹⁹ U.S. Department of the Treasury, "U.S. Treasury Announces Unprecedented & Expansive Sanctions Against Russia, Imposing Swift and Severe Economic Costs," press release, February 24, 2022.

¹⁰⁰ U.S. Department of the Treasury, "Treasury Sanctions Russians Bankrolling Putin and Russia-Backed Influence Actors," March 3, 2022. Also see White House, "The United States Continues to Target Russian Oligarchs Enabling Putin's War of Choice," March 3, 2022.

¹⁰¹ U.S. Department of the Treasury, "Treasury Sanctions Kremlin Elites, Leaders, Oligarchs, and Family for Enabling Putin's War Against Ukraine," press release, March 11, 2022; and U.S. Department of the Treasury, "Treasury Imposes Swift and Severe Costs on Russia for Putin's Purported Annexation of Regions of Ukraine," press release, September 30, 2022.

¹⁰² U.S. Department of the Treasury, "Treasury Imposes Swift and Severe Costs on Russia for Putin's Purported Annexation of Regions of Ukraine," press release, September 30, 2022.

- Deny export licenses for goods or technology controlled for national security reasons (the Commodity Control List).¹⁰³

Within three months after the initial determination, the CBW Act requires the President to impose at least three additional restrictions unless the President determines and certifies to Congress that the government in question

- “Is no longer using chemical or biological weapons in violation of international law or using lethal chemical or biological weapons against its own nationals”;
- “Has provided reliable assurances that it will not in the future engage in any such activities”; and
- “Is willing to allow on-site inspections by United Nations observers or other internationally recognized, impartial observers, or other reliable means exist, to ensure that that government is not using chemical or biological weapons in violation of international law and is not using lethal chemical or biological weapons against its own nationals.”¹⁰⁴

The CBW Act’s menu of possible second-round sanctions includes the authority to

- oppose loans or financial or technical assistance by international financial institutions;
- prohibit U.S. banks from making loans or providing credit to the violating government, except for the purchase of food or other agricultural products;
- prohibit exports of other goods and technology, except food and other agricultural products;
- restrict importation into the United States of articles that are the growth, product, or manufacture of the violating government;
- downgrade or suspend diplomatic relations; and
- set in motion the suspension of foreign air carriers owned or controlled by the violating government “to engage in foreign air transportation to or from the United States.”¹⁰⁵

The CBW Act authorizes the President to waive sanctions if the President finds it essential to U.S. national security interests and notifies Congress at least 15 days in advance. The President also may waive sanctions if the President finds that the violating government has undergone fundamental changes in leadership or policies (and notifies Congress at least 20 days in advance).¹⁰⁶

CBW-related sanctions remain in place for at least a year. The sanctions may be removed only after the President determines and certifies to Congress that the three conditions stated above

¹⁰³ Chemical and Biological Weapons Control and Warfare Elimination Act of 1991 (CBW Act; P.L. 102-182, Title III; 22 U.S.C. 5601 et seq.), §307(a); 22 U.S.C. 5605(a). President Clinton delegated the authority to make determinations and exercise waiver authority to the Secretary of State. Based on the Secretary of State’s determinations, the authority to restrict certain imports or exports is delegated to, respectively, the Secretary of the Treasury and the Secretary of Commerce. E.O. 12851 of June 11, 1993, “Administration of Proliferation Sanctions, Middle East Arms Control, and Related Congressional Reporting Responsibilities,” 58 *Federal Register* 33181, June 15, 1993.

¹⁰⁴ CBW Act, §307(b)(1); 22 U.S.C. 5605(b)(1).

¹⁰⁵ CBW Act, §307(b)(2); 22 U.S.C. 5605(b)(2).

¹⁰⁶ CBW Act, §307(d)(1)(B); 22 U.S.C. 5605(d)(1)(B).

have been met and that the violating government is making restitution to those affected by the use of the chemical weapon.

Poisoning of Sergei Skripal

On August 6, 2018, then-Secretary of State Michael Pompeo determined that in March 2018, the Russian government used a chemical weapon in the UK in contravention of international law. The primary victims were British citizen Sergei Skripal, a former Russian military intelligence officer once imprisoned in Russia for allegedly working as a UK double agent, and his daughter. This finding triggered the CBW Act.¹⁰⁷ Russian authorities denied involvement in the attack or possession of chemical weapons.

On August 27, 2018, the State Department announced the imposition of a first round of CBW Act sanctions but invoked national security waiver authority to allow for the continuation of

- foreign assistance;
- exports related to space cooperation and commercial space launches; and
- export licensing for specific categories of national security-sensitive goods and technology, including exports related to civil aviation safety, commercial end users civil end uses, wholly owned U.S. and other foreign subsidiaries operating in Russia, and deemed export licenses for Russian nationals working in the United States.¹⁰⁸

On November 6, 2018, the State Department reportedly informed Congress that it “could not certify that the Russian Federation met the [required] conditions” and intended “to proceed in accordance with the terms of the CBW Act, which directs the implementation of additional sanctions.”¹⁰⁹ The Administration did not immediately impose a second round of CBW Act-related sanctions, but in December 2018 OFAC imposed sanctions on two GRU officers for the “attempted assassination” of Skripal and his daughter through the use of a lethal nerve agent.¹¹⁰

The Administration took its next steps to implement CBW Act-related sanctions in August 2019. On August 1, President Trump issued E.O. 13883 to require the Secretary of the Treasury to implement measures, “when necessary,” to oppose U.S. support for international financing and to prohibit access to U.S. bank loans.¹¹¹ On August 2, Treasury issued a directive (the CBW Act Directive) specifying that the latter measures prohibited U.S. banks from “lending non-ruble denominated funds to the Russian sovereign” or participating “in the primary market for non-ruble denominated bonds issued by the Russian sovereign” (such restrictions were expanded to

¹⁰⁷ The CBW Act has been invoked on two other occasions. In 2013, the State Department determined that the government of Syria had used chemical weapons but for national security reasons sanctions decisions would be applied on a case-by-case basis. In 2018, the Secretary of State determined that the government of North Korea was responsible for a lethal 2017 nerve agent attack on the half-brother of North Korean leader Kim Jong-un in Malaysia. Sanctions imposed were largely redundant with restrictions already in place.

¹⁰⁸ U.S. Department of State, “Determinations Regarding Use of Chemical Weapons by Russia Under the Chemical and Biological Weapons Control and Warfare Elimination Act of 1991,” 83 *Federal Register* 43723, August 27, 2018.

¹⁰⁹ Reuters, “U.S. Intends More Sanctions on Russia over Chemical Weapons: Spokeswoman,” November 6, 2018.

¹¹⁰ Although the attempted assassination was not cyber-related, OFAC used CRIEEA, Section 224 (undermining cybersecurity), to designate these officers as agents of the previously designated GRU. U.S. Department of the Treasury, “Treasury Targets Russian Operatives over Election Interference, World Anti-Doping Agency Hacking, and Other Malign Activities,” press release, December 19, 2018.

¹¹¹ E.O. 13883 of August 1, 2019, “Administration of Proliferation Sanctions and Amendment of Executive Order 12851,” 84 *Federal Register* 38113, August 5, 2019.

ruble-denominated funds in 2021; see “Poisoning of Alexei Navalny,” below).¹¹² In addition, export licenses to Russian state-owned or state-funded enterprises for goods controlled for their dual-use chemical and biological applications became subject to a “presumption of denial” policy.¹¹³

Poisoning of Alexei Navalny

On March 2, 2021, Secretary of State Antony Blinken determined that in August 2020, the Russian government used a chemical weapon against its own national, Russian opposition figure Alexei Navalny. This finding again triggered the CBW Act. The Department of State called the attack an “attempted assassination,” and the White House stated that the intelligence community assessed with “high confidence” that officers of the FSB were responsible for the attack. Russian authorities denied involvement.¹¹⁴ Navalny died in February 2024 while incarcerated in an Arctic penal colony.

Secretary Blinken announced the imposition of the first round of sanctions but invoked national security waiver authority to allow for the continuation of

- foreign assistance;
- exports related to space cooperation and, until September 1, 2021, commercial space launches; and
- export licensing for specific categories of national security-sensitive goods and technology, including exports related to civil aviation safety, wholly owned U.S. and other foreign subsidiaries operating in Russia, and deemed export licenses.¹¹⁵

In addition, the Department of State added Russia to the International Trafficking in Arms Regulations list of countries subject to a policy of denial for exports of defense articles and defense services.¹¹⁶

The Department of State also imposed sanctions on the FSB, GRU, two GRU officers, and three research institutes for use of a chemical weapon in either the 2020 attack or the 2018 attack against Skripal (the FSB, GRU, and GRU officers already were subject to U.S. sanctions).¹¹⁷ These sanctions were imposed pursuant to E.O. 13382, targeting WMD proliferators.

¹¹² Office of Foreign Assets Control, “Issuance of Russia-Related Directive Pursuant to Executive Order 13883 of August 1, 2019,” 84 *Federal Register* 48704, September 16, 2019.

¹¹³ U.S. Department of State, “Imposition of Additional Sanctions on Russia Under the Chemical and Biological Weapons Control and Warfare Elimination Act of 1991,” 84 *Federal Register* 44671, August 26, 2019.

¹¹⁴ U.S. Department of State, “Imposing Sanctions on Russia for the Poisoning and Imprisonment of Aleksey Navalny,” March 2, 2021; and White House, “Press Briefing by Press Secretary Jen Psaki,” March 2, 2021.

¹¹⁵ U.S. Department of State, “Imposition of Additional Sanctions on Russia Under the Chemical and Biological Weapons Control and Warfare Elimination Act of 1991,” 86 *Federal Register* 24804, March 18, 2021.

¹¹⁶ U.S. Department of State, “International Traffic in Arms Regulations: Addition of Russia,” 86 *Federal Register* 14802, March 18, 2021.

¹¹⁷ In addition to being subject to sanctions for cyber-enabled malicious activities, Russian harmful foreign activities, and weapons of mass destruction proliferation, the Federal Security Service is subject to sanctions for involvement in the wrongful detention of U.S. nationals in Russia. E.O. 14078 of July 19, 2022, “Bolstering Efforts to Bring Hostages and Wrongfully Detained United States Nationals Home,” 87 *Federal Register* 43389, July 21, 2022; and U.S. Department of State, “Sanctioning Russian Federation and Iranian State Actors Responsible for the Wrongful Detention of U.S. Nationals,” April 27, 2023.

On August 20, 2021, the State Department and the Department of the Treasury announced a second round of CBW Act sanctions and additional measures.¹¹⁸ These measures again included U.S. opposition to the provision of international loans or assistance to the Russian government, a prohibition against U.S. bank loans to the Russian government in non-ruble denominated funds, and a prohibition against U.S. bank participation in the primary market for non-ruble denominated sovereign bonds. Measures also included a “presumption of denial” policy on U.S. exports to Russia of nuclear, chemical, biological, and missile-related goods and technology, as well as a prohibition on the permanent importation of firearms and ammunition, as defined on the U.S. Munitions Import List, that are manufactured or located in Russia.

The Department of the Treasury or the State Department also imposed sanctions on nine Russian individuals (mostly FSB officers) and four Russian entities (two already subject to sanctions) involved in Navalny’s poisoning or Russia’s chemical weapons program. These sanctions were imposed pursuant to E.O. 13382 or E.O. 14024 (on Russian harmful foreign activities). In 2023, OFAC redesignated four of the individuals pursuant to the Sergei Magnitsky Act (see “Human Rights Abuses and Corruption,” above).

In April 2021, under E.O. 14024 and an accompanying directive, the Biden Administration expanded the prohibition against U.S. financial institutions participating in the primary market for Russian sovereign bonds or lending to the Russian government to include ruble-denominated funds.¹¹⁹

Nord Stream 2: Energy Exports as a Coercive or Political Tool

Three legislative provisions authorize or require sanctions related to the use of Russian energy exports as a coercive or political tool.

Two of these authorities were used to target Russia’s Nord Stream 2 natural gas pipeline project to Germany. Construction of the Nord Stream 2 pipeline was initially suspended in December 2019, after Congress passed the Protecting Europe’s Energy Security Act of 2019 (PEESA) requiring new sanctions related to the pipeline.¹²⁰ Construction resumed at the end of 2020 and reportedly was completed in September 2021. Additional steps, including certification by German authorities, were required before the pipeline was to be able to transport gas.¹²¹ The government of Germany suspended certification of the pipeline two days before Russia launched its expanded invasion of Ukraine in February 2022.¹²²

Under CRIIEA, Section 232, the President is authorized to impose sanctions on those who invest \$1 million (or, in aggregate, \$5 million over 12 months) or provide goods, services, or support valued at the same amount for the construction of Russian energy export pipelines, including Nord Stream 2.¹²³ On President Trump’s last full day in office in January 2021, the Trump Administration invoked Section 232 to impose sanctions on the Russian vessel *Fortuna*, which Gazprom was using to complete construction of Nord Stream 2, and its corporate owner.

¹¹⁸ U.S. Department of State, “Imposition of Additional Sanctions on Russia Under the Chemical and Biological Weapons Control and Warfare Elimination Act of 1991,” 86 *Federal Register* 50203, September 7, 2021.

¹¹⁹ OFAC, “Publication of Russian Harmful Foreign Activities Directive 1,” 86 *Federal Register* 35867, July 7, 2021.

¹²⁰ P.L. 116-92, Title LXXV; 22 U.S.C. 9526 note.

¹²¹ America Hernandez, “3 Hurdles Still Facing the Nord Stream 2 Pipeline,” *Politico*, September 12, 2021.

¹²² For more, see Gerald Traufetter, “German Government Halts Certification of Nord Stream 2 Gas Pipeline,” *Spiegel International*, February 22, 2022; and CRS In Focus IF11138, *Russia’s Nord Stream 2 Natural Gas Pipeline to Germany Halted*, by Paul Belkin, Michael Ratner, and Cory Welt.

¹²³ 22 U.S.C. 9526.

In August 2021, President Biden issued E.O. 14039 to authorize sanctions provided for in PEESA. As amended, PEESA provides for sanctions on any foreign person whom the President determines has sold, leased, provided, or facilitated the provision of vessels for the purpose of subsea pipe-laying activities related to the construction of Nord Stream 2 and TurkStream, another Russian pipeline that supplies natural gas to Europe, or any successor pipeline.¹²⁴ PEESA also targets those who provide underwriting services, insurance, certain upgrades, or installation services. Sanctions do not apply to nonbusiness entities of the EU, member states, or a few other non-EU governments.

PEESA provides for a 30-day wind-down period; exceptions for repairs, maintenance, environmental remediation, and safety; and a national security waiver. In addition, PEESA provides for terminating sanctions if the President certifies to Congress “that appropriate safeguards have been put in place”

- to minimize Russia’s ability to use the sanctioned pipeline project “as a tool of coercion and political leverage” and
- to ensure “that the project would not result in a decrease of more than 25 percent in the volume of Russian energy exports transiting through existing pipelines in other countries, particularly Ukraine, relative to the average monthly volume of Russian energy exports transiting through such pipelines in 2018.”

In February 2021, the Biden Administration identified *Fortuna* and its owner as subject to sanctions under PEESA. Subsequently, the Administration designated another 16 vessels and seven entities under PEESA or E.O. 14039.

In May 2021, the Administration waived the application of new sanctions on Nord Stream 2 AG, its chief executive officer (CEO), and other corporate officers (Nord Stream 2 AG is a Swiss-based company Gazprom established to construct and operate the pipeline). Some Members of Congress urged the Administration to terminate the waiver and impose additional sanctions in an attempt to prevent the pipeline from becoming operational. The Administration terminated the waiver and imposed sanctions on Nord Stream 2 AG and its CEO on February 23, 2022, the day before Russia launched its expanded invasion of Ukraine.

In addition, UFSA, Section 4(b)(3), authorizes the President to impose sanctions on Russia’s state-owned energy company Gazprom if the President determines that Gazprom is withholding significant natural gas supplies from NATO member states or countries such as Ukraine, Georgia, and Moldova. No sanctions have been imposed under this authority.

In addition to these legislative provisions, E.O. 14024 provides for sanctions on Russian individuals and entities responsible for “cutting or disrupting gas or energy supplies to Europe, the Caucasus, or Asia.”

Other Sanctions Programs

The United States imposes economic sanctions on Russian individuals and entities in response to various other objectionable activities. These activities include weapons proliferation, trade with North Korea in violation of U.N. Security Council requirements, support for the Syrian and Venezuelan governments, transnational crime, and international terrorism.

¹²⁴ E.O. 14039 of August 20, 2021, “Blocking Property with Respect to Certain Russian Energy Export Pipelines,” 86 *Federal Register* 47205, August 24, 2021. On TurkStream, see CRS In Focus IF11177, *TurkStream: Russia’s Southern Pipeline to Europe*, by Sarah E. Garding et al.

Weapons Proliferation

Several laws require the President to impose sanctions on those the President determines have engaged in trade in WMD or advanced conventional weapons.¹²⁵ Restrictions cover a range of activities and can include a one- to two-year cutoff of procurement contracts with the U.S. government and restrictions on import and export licensing. Restrictions also may include a denial of U.S. foreign aid, sales of defense articles and defense services subject to U.S. export control for national security and foreign policy purposes (U.S. Munitions List items), and export licenses for dual-use goods and services (Commerce Control List).¹²⁶

Pursuant to the Iran, North Korea, and Syria Nonproliferation Act (INKSNA; P.L. 106-178; 50 U.S.C. 1701 note), as amended, Russian state-owned arms exporter Rosoboronexport and other Russian entities—including, in February 2024, the Russian Aerospace Forces (VKS) and the Wagner Group—periodically have been denied most U.S. government procurement contracts, export licenses, and trade in U.S. Munitions List-controlled goods and services.¹²⁷ Weapons proliferation sanctions against Rosoboronexport have been in addition to Ukraine-related sectoral sanctions imposed on the agency in 2015, its designation in 2018 as an SDN for providing support to the Syrian government, and applicable export controls.¹²⁸ Restrictions against entering into government contracts and other transactions with Rosoboronexport have been stated in annual Department of Defense appropriations acts since 2013 (see “Restrictions on U.S. Government Funding,” below).

Under E.O. 13382, targeting WMD proliferators and their supporters, OFAC has designated individuals and entities alleged to be involved in the use of a chemical weapon on behalf of the Russian government and in the “research, development, production, and procurement” of UAVs that Iran has supplied to Russia for use in its war against Ukraine.¹²⁹

In 2017, BIS imposed export-licensing restrictions on two entities for producing a ground-launched cruise missile system and associated launcher in violation of the Intermediate-Range Nuclear Forces Treaty (INF Treaty). Due to Russia’s failure to return to compliance with the INF Treaty, the United States withdrew from the treaty in 2019.¹³⁰

¹²⁵ See CRS Report RL31502, *Nuclear, Biological, Chemical, and Missile Proliferation Sanctions: Selected Current Law*, by Dianne E. Rennack.

¹²⁶ Defense articles and defense services subject to U.S. export controls for national security and foreign policy purposes are identified on the U.S. Munitions List, as established in Section 38 of the Arms Export Control Act (22 U.S.C. 2778). Dual-use goods and services similarly subject to export controls are identified on the Commerce Control List, 15 C.F.R. Part 774 Supplement 1, pursuant to authorities in the Export Control Act of 2018 (P.L. 115-232, Title XVII, Part I) to the extent it continues regulations issued under the Export Administration Act of 1979 (P.L. 96-72; 50 U.S.C. 4601 et seq.) (see, in particular, §1758(g)(2) of the 2018 act).

¹²⁷ P.L. 106-178; 50 U.S.C. 1701 note. See, most recently, U.S. Department of State, “Imposition of Nonproliferation Measures Against Foreign Persons, Including a Ban on U.S. Government Procurement,” 89 *Federal Register* 16078, March 6, 2024.

¹²⁸ Rosoboronexport first became subject to U.S. sanctions in 2006 pursuant to the Iran Nonproliferation Act of 2000 (P.L. 106-178); Rosoboronexport, along with other Russian defense entities, was designated anew in 2008 and again in 2015.

¹²⁹ On the former, see “Use of a Chemical Weapon,” above; on the latter, see, for example, U.S. Department of the Treasury, “Treasury Sanctions Iranian Persons Involved in Production of Unmanned Aerial Vehicles and Weapon Shipment to Russia,” press release, September 8, 2022.

¹³⁰ BIS, “Addition of Certain Persons to the Entity List,” 82 *Federal Register* 60304, December 20, 2017. For more, see CRS In Focus IF11051, *U.S. Withdrawal from the INF Treaty: What’s Next?*, by Amy F. Woolf.

North Korea Sanctions Violations

The U.N. Security Council, beginning in 2006, has required its member states to curtail a range of diplomatic, financial, trade, and exchange relations with North Korea. The Security Council took action in response to North Korea's withdrawal from the Treaty on Non-Proliferation of Nuclear Weapons, testing of nuclear weapons, and efforts to develop missile delivery systems. Security Council resolutions also have drawn attention to North Korea's abuse of diplomatic privileges and immunities, money laundering, bulk cash smuggling, disruption of regional stability, and disregard for the human rights conditions of its civilian population.¹³¹

To meet the United States' U.N. obligations, and to implement requirements enacted in the North Korea Sanctions and Policy Enhancement Act of 2016 (P.L. 114-122; 22 U.S.C. 9201 et seq), as amended by the Korean Interdiction and Modernization of Sanctions Act (CAATSA, Title III), the President has issued a series of E.O.s to block assets, transactions, and travel of designated North Korean individuals and entities. These sanctions also apply to other foreign individuals and entities that engage in trade or support North Korean designees.

Since 2017, at least 34 Russia-related individuals, entities, and vessels have been designated for evading sanctions restricting trade and financial transactions with North Korea. These designations have been made to counter North Korea's WMD and ballistic missile programs, trade in petroleum, importation of migrant workers, and facilitation of transactions with designated entities.¹³²

Syria-Related Sanctions

Since 2004, the President has invoked international emergency authorities to block trade and transactions with the government of Syria and its supporters. The U.S. government has imposed sanctions in response to the Syrian government's prior occupation of Lebanon (required by the U.N. Security Council), support of international terrorism, pursuit of WMD and the means to deliver them, undermining of international efforts to stabilize Iraq, and violence against its own population.¹³³

In 2018, OFAC designated Russia's state-owned arms exporter Rosoboronexport and an associated bank pursuant to E.O. 13582 (issued in August 2011, at the start of Syria's civil war) for providing material support and services to the government of Syria.¹³⁴ Previously, during the

¹³¹ See CRS Report R41438, *North Korea: Legislative Basis for U.S. Economic Sanctions*, by Dianne E. Rennack.

¹³² Russian individuals, entities, and vessels have been designated in relation to trade with North Korea pursuant to E.O. 13382 (footnote 51); E.O. 13551 of August 30, 2010, "Blocking Property of Certain Persons with Respect to North Korea," 75 *Federal Register* 53837, September 1, 2010; E.O. 13687 of January 2, 2015, "Imposing Additional Sanctions with Respect to North Korea," 80 *Federal Register* 817, January 6, 2015; E.O. 13722 of March 15, 2016, "Blocking Property of the Government of North Korea and the Workers' Party of Korea, and Prohibiting Certain Transactions With Respect to North Korea," 81 *Federal Register* 14943, March 18, 2016; and E.O. 13810 of September 20, 2017, "Imposing Additional Sanctions With Respect to North Korea," 82 *Federal Register* 44705, September 25, 2017.

¹³³ The E.O. referenced in this section is E.O. 13582 of August 17, 2011, "Blocking Property of the Government of Syria and Prohibiting Certain Transactions with Respect to Syria," 76 *Federal Register* 52209, August 22, 2011. The initial declaration of a national emergency relating to Syria is stated in E.O. 13338 of May 11, 2004, "Blocking Property of Certain Persons and Prohibiting the Export of Certain Goods to Syria," 69 *Federal Register* 26751, May 13, 2004. The Government of Syria has been designated as a state sponsor of acts of international terrorism under foreign assistance and export authorities since the origin of those authorities in 1979.

¹³⁴ Before Rosoboronexport was designated as an SDN in 2018, SSI sectoral sanctions applied to it as a subsidiary of the Russian defense conglomerate Rostec. Other sanctions relating to weapons proliferation also applied (see "Weapons Proliferation").

Obama Administration, OFAC had designated two other Russian banks, which subsequently had their licenses revoked, and 12 related individuals pursuant to E.O. 13582.

Also in 2018, OFAC designated under E.O. 13582 one Russian individual and three Russia-based entities for providing material support and services to the government of Syria. Treasury said these designees were part of “a complex scheme Iran and Russia have used to bolster the Assad regime and generate funds for Iranian malign activity.”¹³⁵

In 2019, OFAC designated one entity under E.O. 13582 and associated individuals and vessels under the Ukraine-related E.O. 13685 for providing material support and services to the government of Syria and for evading Ukraine-related sanctions. Treasury said the entity was serving as a front company for a sanctioned entity as part of a “scheme to facilitate the [illicit transfer] of jet fuel to Russian forces operating in Syria.”¹³⁶

Venezuela-Related Sanctions

In 2019, OFAC designated a bank that was jointly owned by Russian and Venezuelan state-owned companies under E.O. 13850 for providing support to Venezuela’s state-owned oil company, *Petróleos de Venezuela, S.A. (PdVSA)*.¹³⁷ PdVSA was designated in 2019 to curb the availability of resources to the regime of Nicolás Maduro.

In 2020, OFAC designated two subsidiaries of Russian state-owned oil company Rosneft and one corporate officer for operating in Venezuela’s oil sector under E.O. 13850.

In 2021, OFAC designated under E.O. 13850 two Russian-flagged vessels and their registered owners, among others, for attempting to evade U.S. sanctions.

Transnational Crime

Some Russian nationals are subject to U.S. sanctions for activities related to transnational crime.¹³⁸ At least four Russia-related entities and 11 Russian individuals are currently designated for their roles in transnational criminal organizations (TCOs). In 2017, OFAC designated as a TCO the Thieves-in-Law, which it characterized as “a Eurasian crime syndicate that has been linked to a long list of illicit activity across the globe.”¹³⁹ OFAC designated several individuals

¹³⁵ This scheme involved moving oil from Iran to Syria and funneling funds to the Islamic Revolutionary Guard Corps-Qods Force, its proxies, and Hamas and Hezbollah. The Islamic Revolutionary Guard Corps-Qods Force, Hamas, and Hezbollah are subject to U.S. sanctions as Foreign Terrorist Organizations and Specially Designated Global Terrorists, and for their activities in the Middle East. U.S. Department of the Treasury, “Treasury Designates Illicit Russia-Iran Oil Network Supporting the Assad Regime, Hizballah, and HAMAS,” press release, November 20, 2018.

¹³⁶ U.S. Department of the Treasury, “Treasury Targets Sanctions Evasion Scheme Facilitating Jet Fuel Shipments to Russian Military Forces in Syria,” press release, September 26, 2019.

¹³⁷ E.O. 13850 of November 1, 2018, “Blocking Property of Additional Persons Contributing to the Situation in Venezuela,” 83 *Federal Register* 55243, November 2, 2018. The initial declaration of a national emergency relating to Venezuela is stated in E.O. 13692 of March 8, 2015, “Blocking Property and Suspending Entry of Certain Persons Contributing to the Situation in Venezuela,” 80 *Federal Register* 12747, March 11, 2015. See also CRS In Focus IF10715, *Venezuela: Overview of U.S. Sanctions Policy*, by Clare Ribando Seelke.

¹³⁸ E.O. 13581 of July 24, 2011, “Blocking Property of Transnational Criminal Organizations,” 76 *Federal Register* 44757, July 27, 2011. Although the E.O. does not explicitly address denial of entry into the United States of transnational criminal organization (TCO) designees, the Secretary of Homeland Security, Secretary of State, and Attorney General could draw on authorities stated in the Immigration and Nationality Act (at 8 U.S.C. 1189) to deny entry.

¹³⁹ U.S. Department of the Treasury, “Treasury Targets the ‘Thieves-in-Law’ Eurasian Transnational Criminal Organization,” press release, December 22, 2017.

and two entities as TCOs for their relation to the Thieves-in-Law.¹⁴⁰ In January 2023, OFAC designated Russia's PMC Wagner Group, a state-affiliated paramilitary organization, as a TCO (see "Prigozhin Network" above).¹⁴¹

International Terrorism

Russian nationals are subject to sanctions related to international terrorism. The United States has designated at least three Russian organizations, as well as related entities and individuals, as Specially Designated Global Terrorists (SDGTs) pursuant to E.O. 13224, one of several U.S. counterterrorism sanctions programs.¹⁴²

The Caucasus Emirate, a terrorist and insurgent group in Russia's North Caucasus region, was established in 2007. OFAC listed its founder, Doku Umarov, as an SDGT in 2010 (Umarov was killed in 2013).¹⁴³ The Caucasus Emirate organization was designated in 2011. In 2015, the Islamic State recognized as its local affiliate the Caucasus Province (*Vilayat Kavkaz*), which reportedly was established by insurgents previously affiliated with the Caucasus Emirate. The Caucasus Province was designated as an SDGT in 2015. The current status of both organizations is uncertain.

In 2020, the Russian Imperial Movement (RIM), which the Treasury Department has referred to as an "ethnically motivated violent extremist group," was designated as an SDGT "for providing training for acts of terrorism ... to white supremacists and neo-Nazis in Europe."¹⁴⁴ At least six related individuals, including RIM's leaders, also have been designated.

In addition, Russian entities have been designated for facilitating financial transactions to support Iran's Islamic Revolutionary Guard Corps-Qods Force, which itself has been designated as an SDGT and a Foreign Terrorist Organization, and for supporting terrorist groups.

Restrictions on U.S. Government Funding

As in past years, FY2024 appropriations acts restrict U.S. assistance to the Russian government. The Department of Defense Appropriations Act, 2024 (P.L. 118-47, Division A), prohibits the use of defense funding to make a loan or loan guarantee to Rosoboronexport or any of its subsidiaries

¹⁴⁰ During the Obama Administration, OFAC designated some of these designees as part of a related TCO, the Brothers' Circle, one of four transnational criminal organizations initially designated under E.O. 13581 (the other three were the Italian Camorra, Japanese Yakuza, and Mexico-based Los Zetas). The Administration indicated that many Brothers' Circle members "share a common ideology based on the 'thief-in-law' tradition." When OFAC designated the Thieves-in-Law, it delisted the Brothers' Circle and some related individuals and entities; others were delisted subsequently. U.S. Department of the Treasury, "Fact Sheet: New Executive Order Targets Significant Transnational Criminal Organizations," July 25, 2011; and U.S. Department of the Treasury, "Treasury Designates Key Members of the Brothers' Circle Criminal Organization," press release, December 20, 2012.

¹⁴¹ See footnote 85.

¹⁴² E.O. 13224 of September 23, 2001, "Blocking Property and Prohibiting Transactions with Persons Who Commit, Threaten to Commit, or Support Terrorism," 66 *Federal Register* 49079, September 25, 2001; E.O. 13268 of July 2, 2002, "Termination of Emergency with Respect to the Taliban and Amendment of Executive Order 13224 of September 23, 2001," 67 *Federal Register* 44751, July 3, 2002; and E.O. 13372 of February 16, 2005, "Clarification of Certain Executive Orders Blocking Property and Prohibiting Certain Transactions," 70 *Federal Register* 8499, February 18, 2005.

¹⁴³ Umarov's successor also was listed as a Specially Designated Global Terrorist less than a month before his death in 2015 (and delisted in 2022).

¹⁴⁴ U.S. Department of State, "United States Designates Russian Imperial Movement and Leaders as Global Terrorists," press release, April 7, 2020; and U.S. Department of the Treasury, "U.S. Sanctions Members of Russian Violent Extremist Group," press release, June 15, 2022.

(§8115).¹⁴⁵ The Department of State, Foreign Operations, and Related Programs Appropriations Act, 2024 (P.L. 118-47, Division F), requires country notification procedures to be invoked for foreign aid to Russia (§7015(f)). This act also prohibits funds from being made available to Russia's central government (§7047(a)), a restriction in place since FY2015.

Pursuant to the Trafficking Victims Protection Act of 2000, as amended (P.L. 106-386, Division A; 22 U.S.C. 7101 et seq.), the State Department every year since 2013 has placed the government of Russia in a Tier 3 category for its failure to meet minimum standards for the elimination of human trafficking and for failing to make significant efforts to comply with minimum standards. As a result, the President does not provide non-humanitarian, non-trade-related assistance to the Russian government and denies U.S. support for multilateral development loans or other funds to the Russian government. For FY2024, however, the President determined it is in the U.S. national interest to waive restrictions on funds for Russia's participation in educational and cultural exchange programs as described in Section 110(d)(1)(A)(ii) of the act.¹⁴⁶

Since 2022, the State Department has identified Russia annually "as having governmental armed forces, police, or other security forces or government-supported armed groups that recruited or used child soldiers."¹⁴⁷ Pursuant to the Child Soldiers Prevention Act of 2008 (P.L. 110-457, Title IV; 22 U.S.C. 2370c), Russia is denied certain kinds of security assistance and direct commercial sales of military equipment.¹⁴⁸

Under the International Religious Freedom Act of 1998 (IRFA; P.L. 105-292; 22 U.S.C. 6401 et seq.), as amended, Russia is designated as a "country of particular concern" for "having engaged in or tolerated particularly severe violations of religious freedom." IRFA provides that the President may forego imposing additional restrictions if those already in effect constitute "multiple, broad-based sanctions imposed in significant part in response to human rights abuses, and such sanctions are ongoing."¹⁴⁹ The 2024 annual determination notes that this condition is met by sanctions imposed on Russia under authorities enacted in "section 404(a)(2) of the [Sergei Magnitsky Act] and section 11 of [SSIDES], as amended by section 228 of [CRIEEA]."¹⁵⁰

¹⁴⁵ The restriction in Defense appropriations has been restated each year since FY2013.

¹⁴⁶ 22 U.S.C. 7107. The waiver justification notes the value of including "Russian teachers, academics, doctors, nurses, researchers, and legal professionals, ... individuals employed at public institutions, reform-oriented government officials at the regional or municipal level, and teachers of minority languages and cultures" in educational and cultural exchanges. Presidential Determination No. 2023-14 of September 29, 2023, "Presidential Determination with Respect to the Efforts of Foreign Governments Regarding Trafficking in Persons," 88 *Federal Register* 73523, October 25, 2023. For additional information on the trafficking in persons report and associated aid restrictions, see CRS Report R44953, *The State Department's Trafficking in Persons Report: Scope, Aid Restrictions, and Methodology*, by Michael A. Weber, Katarina C. O'Regan, and Liana W. Rosen.

¹⁴⁷ U.S. Department of State, *2023 Trafficking in Persons Report*, June 2023.

¹⁴⁸ A presidential waiver allows for the issuance of direct commercial sales licenses related to the International Space Station. Presidential Determination 2023-11 of September 15, 2023, "Presidential Determination and Certification with Respect to the Child Soldiers Prevention Act of 2008," 88 *Federal Register* 66671, September 27, 2023.

¹⁴⁹ International Religious Freedom Act of 1998 (P.L. 105-292; 22 U.S.C. 6401 et seq.), §402(c)(5); 22 U.S.C. 6442(c)(5).

¹⁵⁰ U.S. Department of State, Public Notice 12310, "Secretary of State's Determinations Under the International Religious Freedom Act of 1998 and Frank R. Wolf International Religious Freedom Act of 2016," 89 *Federal Register* 3980, January 22, 2024. For additional information, see CRS In Focus IF10803, *Global Human Rights: International Religious Freedom Policy*, by Michael A. Weber.

Outlook¹⁵¹

While sanctions targeting Russia have been supported on a bipartisan basis in Congress, debates about the impact and effectiveness of sanctions on Russia persist. Some U.S. and other officials and observers maintain that sanctions have complicated Russia's ability to secure military victory in Ukraine and increased the costs to Russia of waging war.¹⁵² They note, for example, that Russia's financial sector has lost hundreds of billions of dollars, its military has difficulty procuring key components, many Russian factories have suspended production because they cannot access foreign-origin parts, and hundreds of international companies have exited Russia. Russia's government also is facing fiscal pressures: revenues from energy exports fell in 2023, military expenditures have increased, and Russia cannot borrow from international capital markets. Some U.S. officials and observers argue that the impact of sanctions will grow over time; the Department of the Treasury has stated that "[Russia's] leaders face increasingly painful tradeoffs that will sacrifice long-term prospects—as underinvestment, slow productivity growth, and labor shortages will only deepen."¹⁵³

Others are skeptical that sanctions and export controls have compelled or can compel desired changes in Russian behavior. In February 2024, the *Economist* argued that "Russia's economy has been more resilient, and the sanctions effort much leakier, than was hoped."¹⁵⁴ Some large economies such as China, India, Turkey, and Brazil did not impose their own sanctions on Russia and, on the contrary, increased trade with Russia.¹⁵⁵ Much of this trade is not subject to U.S. sanctions or export controls. In addition, some restricted trade with Russia reportedly has continued, including via intermediaries in China, Turkey, the United Arab Emirates, and Central Asia and the Caucasus.¹⁵⁶

The U.S. government and others have sought to tighten their sanctions programs and strengthen sanctions and export control enforcement to deny Russia the economic resources, technology, and

¹⁵¹ Rebecca Nelson, Specialist in International Trade and Finance, contributed to this section.

¹⁵² European Union External Action, "Yes, the Sanctions Against Russia Are Working," August 6, 2023; U.S. Department of the Treasury, "Sanctions and Russia's War: Limiting Putin's Capabilities," December 14, 2023; Michael Sheldrick, "Russian Sanctions Offer Hope to Ukraine in 2024 Despite Aid Setback," *Forbes*, December 22, 2023; and Christine Abely, "Sanctions Are Working, and Can Work Even Better," *War on the Rocks*, February 22, 2024.

¹⁵³ U.S. Department of the Treasury, "Sanctions and Russia's War: Limiting Putin's Capabilities," December 14, 2023. Also see Timothy Ash, "Abandoning Hope on Russia Sanctions? Don't," Center for European Policy Analysis, August 18, 2023; Leon Aron, "The Sanctions Against Russia Are Starting to Work," *Atlantic*, December 7, 2023; and Tim Lister, "Russia Boasts It Is Beating Sanctions, But Its Longer-Term Prospects Are Bleak," CNN, January 29, 2024.

¹⁵⁴ *Economist*, "Sanctions Are Not the Way to Fight Vladimir Putin," February 21, 2024. Also see Larry Elliott, "The West's Tightening of Russian Sanctions Is a Sign of Failure," *Guardian*, May 21, 2023; Nahal Toosi et al., "The West Tried to Crush Russia's Economy. Why Hasn't It Worked?," *Politico*, February 24, 2024; and Steven Feldstein and Fiona Brauer, "Why Russia Has Been So Resilient to Western Export Controls," Carnegie Endowment for International Peace, March 11, 2024.

¹⁵⁵ Ana Swanson, "China's Economic Support for Russia Could Elicit More Sanctions," *New York Times*, February 22, 2023; Adam Samson, Chris Cook, and Max Seddon, "Turkey's Exports of Military-Linked Goods to Russia Soar," *Financial Times*, November 27, 2023; Bryan Harris, "Brazil's Imports of Russian Oil Products Soar," *Financial Times*, January 30, 2024; and Timur Kulakhmetov, *Russia's Turn to the East: Energy Exports to China and India*, Energy Innovation Reform Project, March 2024.

¹⁵⁶ Nikita Smagin, "Is the Blossoming Relationship Between Russia and the UAE Doomed?," Carnegie Endowment for International Peace, April 13, 2023; Adam Samson, Chris Cook, and Max Seddon, "Turkey's Exports of Military-Linked Goods to Russia Soar," *Financial Times*, November 27, 2023; Paul Mozur, Aaron Krolik, and Adam Satariano, "Chinese Trades and Moroccan Ports: How Russia Flouts Global Tech Bans," *New York Times*, December 19, 2023; and Clarence Leong and Liza Lin, "Russia's Backdoor for Battlefield Goods from China: Central Asia," *Wall Street Journal*, March 4, 2024.

materiel it needs for its war effort and to deter other Russian malign activities.¹⁵⁷ Reducing trade in U.S.-origin parts and technology via China remains a particular challenge.¹⁵⁸ Another challenge concerns enforcement of the price cap on Russian oil exports, which can require sustained efforts to address issues such as ship registration, flagging, insurance, and the use of ports.¹⁵⁹

Additional implementation of restrictions could include a wider range of secondary sanctions to target more transactions with Russia by third countries (especially with respect to energy trade), restrictions on the importation into the United States of a wider range of Russia-origin products, and the seizure of Russia's immobilized sovereign assets. At the same time, policymakers may wish to consider countervailing factors, such as possible negative economic impacts on the United States or others, competing U.S. foreign policy interests, and retaliatory measures by Russia (including countersanctions and the expropriation of foreign assets). Policymakers also may consider the effectiveness of alternative policies, including diplomatic efforts to secure greater cooperation from countries that have increased their trade with Russia.

Members of Congress may wish to assess the conditions under which the United States should expand, maintain, or remove sanctions on Russia, including the effectiveness of these sanctions and the extent to which sanctions modifications or alternative policy options may be able to address potential shortcomings. As most sanctions on Russia since 2022 have been authorized by E.O.s, Members of Congress also may consider whether to pass legislation to codify such sanctions.

¹⁵⁷ Maria Shagina, "Why Can't the West Stop Supplying Technology for Russian Weapons?," *Foreign Policy*, November 9, 2023; U.S. Department of the Treasury, Financial Crimes Enforcement Network, "FinCEN Exchange Brings Together Public and Private Sectors to Discuss Attempts by Russia to Evade Export Controls," November 21, 2023; Kathryn Carlson and Koen Verhelst, "EU Slams Governments for Banned Goods Reaching Russia," *Politico*, February 7, 2024; and Benoit Faucon, Costas Paris, and Joe Wallace, "Russia's Backdoor to the Global Banking System Is Slamming Shut," *Wall Street Journal*, March 19, 2024.

¹⁵⁸ Olena Bilousova et al., *Challenges of Export Controls Enforcement: How Russia Continues to Import Components for Its Military Production*, Yermak-McFaul International Working Group on Russian Sanctions and KSE Institute, January 2024.

¹⁵⁹ U.S. Department of the Treasury, *Oil Price Cap Compliance and Enforcement Alert*, February 1, 2024; Brendan Cole, "Russia's Shadow Fleet Running Out of Places to Hide," *Newsweek*, February 6, 2024; and Selwyn Parker, "Russia's Shadow Tanker Fleet Runs into Trouble," *Interpreter*, February 13, 2024.

Appendix A. Legislative Abbreviations and Short Titles

CAATSA: Countering America’s Adversaries Through Sanctions Act (P.L. 115-44)

CBW Act: Chemical and Biological Weapons Control and Warfare Elimination Act of 1991 (P.L. 102-182, Title III; 22 U.S.C. 5601 et seq.)

CRIEEA: Countering Russian Influence in Europe and Eurasia Act of 2017, as amended (P.L. 115-44, Countering America’s Adversaries Through Sanctions Act [CAATSA], Title II; 22 U.S.C. 9501 et seq.)

Global Magnitsky Act: Global Magnitsky Human Rights Accountability Act (P.L. 114-328, Title XII, Subtitle F; 22 U.S.C. 2656 note)

IEEPA: International Emergency Economic Powers Act (P.L. 95-223; 50 U.S.C. 1701 et seq.)

INKSNA: Iran, North Korea, and Syria Nonproliferation Act, as amended (P.L. 106-178; 50 U.S.C. 1701 note)

NEA: National Emergencies Act (P.L. 94-412; 50 U.S.C. 1601 et seq.)

PEESA: Protecting Europe’s Energy Security Act of 2019 (P.L. 116-92, Title LXXV; 22 U.S.C. 9526 note)

REPO for Ukrainians Act: Rebuilding Economic Prosperity and Opportunity for Ukrainians Act (P.L. 118-50, Division F).

Sergei Magnitsky Act: The Sergei Magnitsky Rule of Law Accountability Act of 2012 (P.L. 112-208, Title IV; 22 U.S.C. 5811 note)

SSIDES: Support for the Sovereignty, Integrity, Democracy, and Economic Stability of Ukraine Act of 2014, as amended (P.L. 113-95; 22 U.S.C. 8901 et seq.)

UFSA: Ukraine Freedom Support Act of 2014, as amended (P.L. 113-272; 22 U.S.C. 8921 et seq.)

Appendix B. Sanctions in Selected Russia-Related Legislation

Sergei Magnitsky Rule of Law Accountability Act of 2012 (P.L. 112-208, Title IV; 22 U.S.C. 5811 note)

Sanctions against **individuals and entities** for

- The detention, abuse, or death of Sergei Magnitsky; efforts to conceal the legal liability for or benefitting financially from the detention, abuse, or death of Sergei Magnitsky; or involvement in the criminal conspiracy uncovered by Sergei Magnitsky
- Extrajudicial killings, torture, or other gross violations of internationally recognized human rights committed against individuals seeking to expose illegal activity carried out by Russian government officials; or against individuals seeking to exercise or defend internationally recognized human rights and freedoms in Russia

Support for the Sovereignty, Integrity, Democracy, and Economic Stability of Ukraine Act of 2014, as amended (SSIDES; P.L. 113-95; 22 U.S.C. 8901 et seq.)

- Sanctions against **individuals and entities** for
 - Violence and human rights abuses during antigovernment protests in Ukraine in 2013-2014 and for having undermined Ukraine's peace, security, stability, sovereignty, or territorial integrity (§8907)
 - Helping to evade sanctions provided for in Ukraine-related or cyber-related executive orders (E.O.s), SSIDES, or UFSA, or that facilitate significant transactions for individuals, their family members, and entities subject to U.S. sanctions imposed with respect to Russia (as amended; §8909)
 - Serious human rights abuses in territories forcibly occupied or otherwise controlled by Russia (as amended; §8910)
- Sanctions against **Russian government officials**, family members, and close associates for acts of significant corruption **in Ukraine** (§8907)
- Sanctions against **Russian government officials**, family members, and close associates for acts of significant corruption in **Russia or elsewhere** (as amended; originally discretionary) (§8908)

Ukraine Freedom Support Act of 2014, as amended (UFSA; P.L. 113-272; 22 U.S.C. 8921 et seq.)

- Sanctions against Russian state arms exporter Rosoboronexport and against **Russian entities** that transfer weapons to Syria or, without consent, Ukraine,

- Georgia, Moldova, and potentially other countries that the President designates as countries of significant concern (§8923)
- Sanctions against **foreign individuals and entities** that make significant investments in deepwater, Arctic offshore, or shale oil projects in Russia (as amended; originally discretionary) (§8923)
 - Sanctions against **foreign financial institutions** that facilitate significant transactions related to defense- and energy-related transactions subject to UFSA sanctions, or for individuals and entities subject to sanctions under UFSA or Ukraine-related E.O.s (as amended; originally discretionary) (§8924)
 - Contingent sanctions against state-owned energy company Gazprom, if it is found to withhold significant natural gas supplies from NATO member states or countries such as Ukraine, Georgia, and Moldova (§8923)

Countering Russian Influence in Europe and Eurasia Act of 2017, as amended (CRIEEA; P.L. 115-44, Countering America’s Adversaries Through Sanctions Act [CAATSA], Title II; 22 U.S.C. 9501 et seq.)

- Codification of Ukraine-related E.O.s 13660, 13661, 13662, and 13685 (§9522)
- Codification of cyber-related E.O. 13694, as amended by E.O. 13757 (not Russia-specific) (§9522)
- Modifications to E.O. 13662 directives to reduce short-term lending terms to financial services and energy companies and to expand restrictions on transactions by U.S. individuals and entities related to the development of deepwater, Arctic offshore, and shale oil projects in which identified Russian entities have an ownership interest of at least 33% or a majority of voting interests (§9523)
- Sanctions against **individuals and entities** for
 - Engaging in or supporting significant activities that undermine cybersecurity on behalf of the Russian government (§9524)
 - Engaging in significant transactions with Russia’s defense and intelligence sectors (§9525)
 - Making or facilitating investments of \$10 million or more that contribute to Russia’s privatization of state-owned assets “in a manner that unjustly benefits” government officials, relatives, or associates (§9527)
- Sanctions against **foreign individuals and entities** for significant support for Syria’s acquisition or development of a variety of advanced or prohibited weapons and defense articles (not Russia-specific) (§9528)
- Discretionary authority to impose sanctions against **individuals and entities** that invest or engage in trade valued at \$1 million, or cumulatively at \$5 million over 12 months, that enhances Russia’s ability to construct energy export pipelines (§9526)

Protecting Europe’s Energy Security Act of 2019, as amended (P.L. 116-92, Title LXXV; 22 U.S.C. 9526 note)

Sanctions against **foreign individuals and entities**, with respect to vessels engaged in certain pipe-laying or pipe-laying activities for “the construction of the Nord Stream 2 pipeline project, the TurkStream pipeline project, or any project that is a successor to either such project,” for

- Selling, leasing, or providing such vessels for construction purposes, or facilitating such transactions, including deceptive or structured transactions
- Providing underwriting services, necessary insurance or reinsurance, or services or facilities for certain upgrades and installations for such vessels for construction purposes
- Providing services for testing, inspection, or certification for completion or operation of the Nord Stream 2 pipeline

Ending Importation of Russian Oil Act (P.L. 117-109; 22 U.S.C. 8923 note)

Ban on importation into the United States of all products of the Russian Federation classified under chapter 27 of the Harmonized Tariff Schedule of the United States (Mineral Fuels; Mineral Oils and Products of Their Distillation; Bituminous Substances; Mineral Waxes)

Author Information

Cory Welt
Specialist in Russian and European Affairs

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