

Overview of the Starvation-Related U.S. Sanctions Regimes

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Major strides in U.S. human rights legislation were made when the United States passed the Global Magnitsky Human Rights Accountability Act (the “Global Magnitsky Act”). The Global Magnitsky act was signed into law on December 23, 2016. Its expanded form allowed the President “to block or revoke U.S. visas and to block all US-based property and interests in property of foreign persons who:

1. Who have engaged in extrajudicial killings, torture, or other gross violations of human rights against individuals who either seek ‘to expose illegal activity carried out by government officials’ or ‘to obtain, exercise, defend, or promote internationally recognized human rights and freedoms, such as the freedoms of religion, expression, association, and assembly, and the rights to a fair trial and democratic elections;’ or

2. Government officials or senior associates of such officials who are engaged in or responsible for acts of significant corruption. Individuals who have acted as agents of or on behalf of human rights abusers or who have materially assisted corrupt officials can also be sanctioned.”¹

The Global Magnitsky Act was expanded on 20 December 2017 by Executive Order 13818 which allows the U.S. government to sanction any foreign person determined by the Secretary of the Treasury, in consultation with the Secretary of State and the Attorney General:

1. To be responsible for or complicit in, or to have directly or indirectly engaged in, serious human rights abuse.
2. To be a current or former government official, or a person acting for or on behalf of such an official,

¹ Human Rights First, The Global Magnitsky Act Frequently Asked Questions, <https://www.humanrightsfirst.org/sites/default/files/hrf-global-magnitsky-faq.pdf>, April 2019.

who is responsible for or complicit in, or has directly or indirectly engaged in:

a. Corruption, including the misappropriation of state assets, the expropriation of private assets for personal gain, corruption related government contracts or the extraction of natural resources, or bribery; or

b. The transfer or the facilitation of the transfer of the proceeds of corruption.

3. To be or have been a leader or official of:

a. An entity, including any government entity, that has engaged in, or whose members have engaged in, serious human rights abuse, corruption, or the facilitation of the transfer of the pro-

ceeds of corruption relating to the leader's or official's tenure; or

b. An entity whose property and interests in property are blocked pursuant to the executive order as a result of activities related to the leader's or official's tenure.

The U.S. has designated a number of individuals and entities under the Global Magnitsky Act for serious human rights abuses. Outside of the Global Magnitsky Act, the Department of State and the Department of the Treasury are granted authority under multiple statutes and Executive Orders to impose sanctions in order to hold human rights abusers accountable for their actions. General information is provided here. The specific statutes and executive orders are discussed in further detail in the chart below.

Department of State

The U.S. Department of State has an office dedicated to the development and implementation of economic sanctions policies. The Office of Economic Sanctions Policy and Implementation (“SPI”) is responsible for developing and implementing foreign policy-related sanctions adopted to counter threats to national security posed by particular activities and countries. As stated on its [website](#), “SPI builds international support for implementation of economic sanctions, provides foreign policy guidance to the Department of Treasury and Commerce on sanctions implementation, and works with Congress to draft legislation that advances U.S. foreign policy goals in these areas.”

Department of the Treasury

The Department of the Treasury’s Office of Foreign Assets Control (“OFAC”) is responsible for “administering and enforcing economic and trade sanctions based on U.S. foreign policy and national security goals against targeted foreign countries and regimes, terrorists, international narcotics traffickers, those engaged in activities related to the proliferation of weapons of mass destruction, and other threats to the national security, foreign policy or economy of the United States. OFAC acts under Presidential national emergency powers, as well as authority granted by specific legislation to impose controls on transactions and freeze assets under U.S. jurisdiction. Many of the sanctions are based on the United Nations and other

international mandates, are multilateral in scope, and involve close cooperation with allied governments.”

OFAC’s sanctions include the designation of specific individuals and entities to the Specially Designated Nationals and Blocked Persons (“SDN”) List. Designation of as SDN means that U.S. persons (including U.S. organizations and financial institutions) will be prohibited from engaging in actions, dealings, or transactions with the SDN, unless a general or specific license is granted. Other non-U.S. persons may also be designated as SDNs if OFAC considers them to be materially complicit in these individual’s or entities’ human rights violations. The financial restrictions implemented by OFAC may continue indefinitely and will serve to isolate the individuals from dealings with all U.S. persons or organizations in their professional and personal capacities. Designation as an SDN is one of the strongest and

most punitive sanctions-related actions by the U.S. government. An OFAC designation will only be removed if the Treasury Department opts to remove it.²

On October 17, 2014, OFAC issued [guidance](#) regarding the reach of economic sanctions for non-governmental organizations involved in the provision of humanitarian assistance. The guidance states: It is the longstanding policy of the [OFAC] to use its licensing authority to support humanitarian relief efforts. Where such transactions are not otherwise exempt or authorized pursuant to OFAC general licenses, OFAC has long had a favorable specific licensing policy supporting the provision of humanitarian assistance notwithstanding economic sanctions, especially in countries subject to comprehensive economic sanctions. OFAC prioritizes requests for licenses to provide humanitarian assistance and endeavors to review such applications expeditiously.

² A person may seek administrative reconsideration of his, her or its designation or that of a vessel as blocked, or assert that the circumstances resulting in the designation no longer apply, and thus seek to have the designation rescinded pursuant to the noted administrative procedures, see 31 C.F.R. § 501.807. According to OFAC’s [published guidance](#), some examples of situations that may result in delisting include: a positive change in behavior, the death of an SDN, the basis for the designation no longer exists, or the designation was based on mistaken identity.

Additionally, the guidance notes that non- governmental organizations may provide humanitarian assistance in countries that are not subject to comprehensive sanctions (such as Yemen, Iraq, Somalia, South Sudan, or Côte d'Ivoire) without the need for a license from OFAC, so long as they are not dealing with persons blocked by sanctions, such as those listed on OFAC's Specially Designated Nationals and Blocked Persons List (SDNs) or any entity owned 50% or more by blocked persons.

Scholarly Commentary on Sanctions Regimes



Proponents of sanctions programmes argue that sanctions are one of the most powerful coercive foreign policy tools, while also being less dangerous or destructive than engaging in war.³ However, sanctions regimes are often met with criticism in relation to sanctions' potential unintended negative humanitarian consequences, for example when sanctions impede the flow of humanitarian assistance to targeted areas.⁴

Critics of sanctions regimes note that the most food insecure countries, according to the Global Hunger Index ("GHI"), are often sanctioned states, including Burundi, Eritrea, Yemen, Afghanistan, Chad, Ethiopia, Sudan, Somalia and North Korea.⁵ One study found that the imposition of sanctions contributes to hunger and starvation in many sanctioned countries even

after accounting for several other factors such as conflict and natural disasters, and that the imposition of sanctions increases the GHI composite index measure of food security on average by about 1.247 – 2.225 points.⁶ The asserted reasons for this causal relationship between the imposition of sanctions and food insecurity include the following factors: (i) the central government in a sanctioned state can under-supply essential resources thereby reducing private-sector (i.e., agricultural) productivity; and (ii) governments can deliberately centralise the distribution of essential goods (e.g., food) in order to use access to food as a defence mechanism to punish dissent against the leadership.⁷

³ See, e.g., Sasha Lohmann, Judith Vorrath, International Sanctions: Improving Implementation through Better Interface Management, at page 3 (August 1, 2021). Available at https://www.swp-berlin.org/publications/products/arbeitspapiere/WP_International_Sanctions.pdf.

⁴ Grégoire Mallard, Sabet Farzan, and Jin Sun, The Humanitarian Gap in the Global Sanctions Regime, *Global Governance: A Review of Multilateralism and International Organizations* 26.1 (2020) p. 121-153. Available at: https://brill.com/view/journals/gg/26/1/article-p121_6.xml?language=en#FN000001. See also for example comments made by former OCHA chief, Mark Lowcock on the over-compliant application of sanctions and their negative effect hampering the passage of humanitarian relief. UN Web TV, Mark Lowcock (OCHA) on the Political and Humanitarian situation in Syria - Security Council VTC (28 April 2021). Available at <https://media.un.org/en/asset/k1e/k1ekd0x66y>.

⁵ See Afesorgbor, Sylvanus Kwaku, Sanctioned to Starve? The Impact of Economic Sanctions on Food Security in Targeted States, at page 1 (July 25, 2020). Forthcoming as a chapter in the *Research Handbook on Economic Sanctions*, Edward Elgar Publishing, UK., Available at SSRN: <https://ssrn.com/abstract=3660536> or <http://dx.doi.org/10.2139/ssrn.3660536>.

⁶ See id. at page 17.

⁷ See id. at page 1 (citing Oechslin, M, Targeting autocrats: Economic sanctions and regime change, *European Journal of Political Economy*, 36, 24–40 (2014)).

Critics also note that sanctions can cause obstacles that impede the flow of humanitarian assistance.⁸ Such obstacles include the fact that humanitarian organisations must often work with sanctioned leaders and individuals to get humanitarian aid into a country, therefore when humanitarian organisations are required to pay taxes, registration fees or checkpoint fees in order to function and accomplish their purposes, they may be forced to violate sanctions laws by paying a sanctioned entity or (unwittingly) paying its affiliates.⁹ Critics also find that humanitarian exemptions to sanctions are often ineffective because malign actors may exploit the exemptions by masquerading as either people in need of humanitarian aid or as humanitarian actors.¹⁰ Its proponents, however, believe that they are necessary to

legally facilitate the provision of humanitarian aid, and that humanitarian actors have developed internal policies and procedures to help prevent or mitigate the diversion of aid.¹¹ Further, proponents generally believe that even if some funds do go to sanctioned individuals and entities, the damage will likely be minimal and will be offset by the benefits that the humanitarian organisations offer.¹²

Additionally, targeted sanctions regimes have been criticized as ineffective, given that individuals and entities might evade sanctions through the use of black markets, trade diversions, safe havens, strategic reserves, and economic adjustments.¹³ One study notes that targeted sanctions are plagued by unintended conse-

⁸ Grégoire Mallard, Sabet Farzan, and Jin Sun, *The Humanitarian Gap in the Global Sanctions Regime*, *Global Governance: A Review of Multilateralism and International Organizations* 26.1 (2020) p. 121-153. Available at: https://brill.com/view/journals/gg/26/1/article-p121_6.xml?language=en#FN000001.

⁹ King, Katie, Naz K. Modirzadeh, Dustin A. Lewis, *Understanding Humanitarian Exemptions: UN Security Council Sanctions and Principled Humanitarian Action*, at pages 5-6, Harvard Law School Program on International Law and Armed Conflict Counterterrorism and Humanitarian Engagement Project (2016), <http://nrs.harvard.edu/urn-3:HUL.InstRepos:29998395>; Alice Debarre, *Making Sanctions Smarter: Safeguarding Humanitarian Action* (December 2019) at page 3. Available at: https://reliefweb.int/sites/reliefweb.int/files/resources/1912_Making-Sanctions-Smarter.pdf.

¹⁰ GLOBAL INVESTIGATIONS REVIEW, *The Guide to Sanctions*, at pages 14-15 (2020), <https://globalinvestigationsreview.com/guide/the-guide-sanctions/first-edition?page=1>.

¹¹ King, Katie, Naz K. Modirzadeh, Dustin A. Lewis, *Understanding Humanitarian Exemptions: UN Security Council Sanctions and Principled Humanitarian Action*, at pages 8-9, Harvard Law School Program on International Law and Armed Conflict Counterterrorism and Humanitarian Engagement Project (2016), <http://nrs.harvard.edu/urn-3:HUL.InstRepos:29998395>.

¹² See id.

¹³ Laura Kanji, *Moving Targets: The Evolution and Future of Smart Sanctions*, *Harvard International Review*, 4 January 2017, <https://www.jstor.org/stable/26445616?refreqid=excelsior%3A7f63fc3fc9df7cbdda735bc568cef033>.

quences in 91 percent of cases, including negative impacts on a country's overall economy or political structure, higher corruption and criminality, the strengthening of authoritarian rule, greater political splintering, humanitarian costs, and unintended harms to neighbouring countries.¹⁴

¹⁴ See *id.*

Chart: Starvation-related Sanctions within the U.S. Sanctions Regime



The digest below outlines the relevant U.S. sanctions-related actions regarding starvation, objects indispensable to survival and humanitarian access-related issues in the following countries since 2017:

- Democratic Republic of the Congo ("DRC")
- Myanmar (Burma)
- Nigeria
- Somalia
- South Sudan
- Sudan
- Syria
- Venezuela
- Yemen
- Ethiopia

Similar to GRC's Starvation [Jurisprudence Digest](#), this digest will be updated regularly and will aim to serve as a resource tool for practitioners interested in understanding and charting the use of sanctions relevant in the conflict and hunger, food-insecurity space. The production of these unique digests is made possible by the generous support of the Netherlands Ministry of Foreign Affairs. Any views expressed herein may not coincide with the official position of The Kingdom of the Netherlands.

Sanctions Digest

Sanctioning Bodies: U.S. Department of State & U.S. Department of the Treasury

Country	U.S. Body/Agency and Type of Action	References to Starvation and/or Humanitarian Access Issues	Impact of Action to Relieving Starvation and/or Humanitarian Access, and relevant Humanitarian-related Sanctions Exemptions, if any
Democratic Republic of Congo	<p>Terrorist Designations of ISIS Affiliates and Leaders in the Democratic Republic of the Congo and Mozambique (State Dep't, March 10, 2021)</p> <p>Status: Active</p>	<p>The Department of State has designated the Islamic State of Iraq and Syria – Democratic Republic of the Congo (ISIS-DRC) and the Islamic State of Iraq and Syria – Mozambique (ISIS-Mozambique) as Foreign Terrorist Organizations under section 219 of the Immigration and Nationality Act, as amended. The Department has also designated ISIS-DRC and ISIS-Mozambique as Specially Designated Global Terrorists (SDGTs) under Executive Order 13224, while also designating respective leaders of those organizations, Seka Musa Baluku and Abu Yasir Hassan, as SDGTs.</p>	<p>ISIS-DRC, also known as the Allied Democratic Forces (ADF), is responsible for many attacks across North Kivu and Ituri Provinces in the eastern DRC. Under the leadership of Seka Musa Baluku, ISIS-DRC has been noted as responsible in this region for brutal violence against Congolese citizens and regional military forces, with attacks killing over 849 civilians in 2020 alone, according to a United Nations report on the ADF.</p>
DRC	<p>SDN Designation of Musa Baluku (Treasury Dep't, December 10, 2019)</p> <p>Status: Active</p>	<p>OFAC sanctioned Seka Musa Baluku, the leader of the Allied Democratic Forces (“ADF”), for the entities engagement in serious human rights abuses including targeting children in situations of armed conflict, including through killing, rape, abduction, and forced displacement. Musa Baluku was designated with five key ADF members who were found to have materially assisted the ADF through recruitment, logistics, administration, financing, intelligence, and operations coordination. The other members designated with Musa Bulaku for materially assisting the ADF are:</p> <ul style="list-style-type: none"> - Amigo Kibirige - Muhammed Lumisa - Elias Segujja - Kayiira Muhammad - Amisi Kasadha 	<p>This sanctions designation affirms that the “U.S. government stands by the DRC government in its efforts to counter armed groups and to bring stability, peace and prosperity to DRC by countering the ADF and other groups attempting to further destabilize the country.” This action, as well as the sanctions designation of the ADF below, responded to such crimes that contributed to the state of starvation in the DRC.</p> <p>This action is intended to limit the financial dealings and access of key ADF leadership and aligns with the DRC government’s broad objectives to tackle ongoing insecurity in eastern DRC.</p> <ul style="list-style-type: none"> - Musa Baluku is the leader of the ADF, an entity that has engaged in, or whose members have engaged in, serious human rights abuse related to his tenure. - Amigo Kibirige has materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, the ADF, an entity that has engaged in, or whose members have engaged in, serious human rights abuse. - Muhammed Lumisa has materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, the ADF, an entity that has engaged in, or whose members have engaged in, serious human rights abuse. - Elias Segujja has materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, the ADF, an entity that has engaged in, or whose members have engaged in, serious human rights abuse.

			<p>- Kaylira Muhammad has materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, the ADF, an entity that has engaged in, or whose members have engaged in, serious human rights abuse.</p> <p>- Amisi Kasadha has materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, the ADF, an entity that has engaged in, or whose members have engaged in, serious human rights abuse.</p>
DRC	<p><u>Amendment</u> of the Democratic Republic of the Congo Sanctions Regulations (Treasury Dep't, November 14, 2018)</p>	<p>§547.201 Prohibited transactions involving blocked property.</p> <p>(a) All property and interests in property that are in the United States, that come within the United States, or that are or come within the possession or control of any U.S. person of the following persons are blocked and may not be transferred, paid, exported, withdrawn, or otherwise dealt in: Any person determined by the Secretary of the Treasury, in consultation with the Secretary of State, to be responsible for or complicit in, or to have engaged in, directly or indirectly, any of the following in or in relation to the Democratic Republic of the Congo:</p> <p>(C) The targeting of women, children, or any civilians through the commission of acts of violence (including killing, maiming, torture, or rape or other sexual violence), abduction, forced displacement, or attacks on schools, hospitals, religious sites, or locations where civilians are seeking refuge, or through conduct that would constitute a serious abuse or violation of human rights or a violation of international humanitarian law;</p> <p>(D) The use or recruitment of children by armed groups or armed forces in the context of the conflict in the Democratic Republic of the Congo;</p> <p>(E) The obstruction of the delivery or distribution of, or access to, humanitarian assistance;</p> <p>(F) Attacks against United Nations missions, international security presences, or other peacekeeping operations; or</p> <p>§547.206 Exempt transactions.</p> <p>(a) United Nations Participation Act. The exemptions described in this section do not apply to transactions involving property or interests in property of persons whose property and interests in property are blocked pursuant to the authority of the United Nations Participation Act, as amended (22 U.S.C. 287c(b)) (UNPA). Persons whose property and interests in property are blocked pursuant to the authority of the UNPA include those listed on both OFAC's Specially Designated Nationals and Blocked Persons List (SDN List) and the Consolidated United Nations Security Council Sanctions List (UN List) (see https://www.un.org) as well as persons listed on the SDN List for being owned or controlled by, or acting for or on behalf of, persons listed on both the SDN List and the UN List.</p>	<p>The Department of the Treasury's Office of Foreign Assets Control (OFAC) issued an amendment to the Democratic Republic of the Congo Sanctions Regulations, 31 C.F.R. part 547, to implement Executive Order 13671, as well to make other technical and conforming changes.</p> <p>These changes include references to the UN Security Council Sanctions List. See the GRC's UN Sanctions Digest for UN sanctions designations relating to the DRC.</p> <p>Additionally, through these regulations, persons who are responsible for forced displacement, attacks on schools, hospitals, religious sites, or locations where civilians are seeking refuge, and who obstruct the delivery or distribution of, or access to, humanitarian assistance are sanctionable by OFAC.</p>

DRC	<p>SDN Designation of the Allied Democratic Forces ("ADF") (Treasury Dep't, July 1, 2014)</p> <p>Status: Active</p>	<p>OFAC designated the ADF for targeting children in situations of armed conflict, including through killing, rape, abduction and forced displacement.</p> <p>According to the press release, the ADF launched a series of attacks in 2013 against civilians in the Democratic Republic of Congo forcing thousands of people to flee into Uganda and abducting or killing those that attempted to return. The ADF was also responsible for "brutal attacks on women and children in several villages, including acts of beheading, mutilation, and rape."</p>	<p>This action was taken pursuant to Executive Order (E.O.) 13413, which authorizes the Treasury Department to designate those who engage in certain activities connected with widespread violence and atrocities that threaten regional stability. This action responded to such crimes that contributed to the state of starvation in the DRC.</p> <p>"We condemn in the strongest terms the ADF's activities and continuing violence against civilians," said David S. Cohen, Treasury's Under Secretary for Terrorism and Financial Intelligence. "With yesterday's UN Security Council action, the international community made clear that groups responsible for such atrocities must be isolated, and we will use our authorities to target those linked to this abhorrent group."</p>
Ethiopia	<p>Visa restrictions under Section 212(a)(3)(C) of the Immigration and Nationality Act</p> <p>Status: Active</p>	<p>On 24 May 2021, the United States imposed travel restrictions on Ethiopia and Eritrean government officials' and members of the security forces, or other individuals, including Amhara regional and irregular forces and members of the TPLF, pursuant to Section 212(a)(3)(C) of the Immigration and Nationality Act.</p> <p>The press release highlighted concern over the ongoing crisis in Tigray region and how the population continues to "suffer human rights violations, abuses, and atrocities, and urgently needed humanitarian relief is being blocked by the Ethiopian and Eritrean militaries as well as other armed actors."</p>	<p>The travel restrictions were imposed condemning, amongst other violations, the destruction of OIS including civilian property, water sources, hospitals and medical facilities and the denial of humanitarian access. This includes those who have conducted wrongful violence or other abuses against people in the Tigray region of Ethiopia, as well as those who have hindered access of humanitarian assistance to those in the region. Immediate family members of such persons may also be subject to these restrictions.</p>
Ethiopia	<p>SDN Designation of General Filipos Woldeyohannes (Filipos) (Treasury Dep't, 23 August 2021)</p> <p>Status: Active</p>	<p>The OFAC designated General Filipos Woldeyohannes (Filipos), the Chief of Staff of the Eritrean Defense Forces (EDF), for his leadership position in an entity involved in serious human rights abuses committed in the ongoing armed conflict in Ethiopia's Tigray region.</p> <p>The EDF forces operating in Ethiopia under the command of Filipos have been responsible for massacres, looting, SGBV, including rape, torture, forcible displacement of the Tigrayan population, with some IDPs describing scorched earth policies being implemented to prevent them from returning home.</p>	<p>Executive Order 13818 builds upon the Global Magnitsky Human Rights Accountability Act of 2016 to target perpetrators of serious human rights abuse and corruption.</p> <p>Andrea M. Gacki, OFAC Director, commented on the designation stating that "[t]he Treasury Department will continue to take action against those involved in serious human rights abuse around the world, including in the Tigray region of Ethiopia, where such acts further exacerbate the ongoing conflict and humanitarian crisis."</p>
Ethiopia	<p>Imposing Sanctions on Certain Persons With Respect to the Humanitarian and Human Rights Crisis in Ethiopia (Executive Order 14046, 17 September 2021)</p> <p>Status: Active</p>	<p>The OFAC made its first designations under Executive Order 14046 in relation to ongoing concerns over the humanitarian and human rights crisis in Northern Ethiopia on 12 November 2021. Designations by OFAC targeted Eritrean actors and included 4 entities and 2 individuals, namely the Eritrean Defense Force, the People's Front for Democracy and Justice, Abraha Kassa Nemariam, Hidri Trust, Hagos Ghebrehiwet W Kidan, and Red Sea Trading Corporation.</p> <p>The Eritrean Defense Force (EDF) were designated amongst others for "for being a government entity that has engaged in, or whose members have engaged in, activities that have contributed to the crisis in northern Ethiopia or have obstructed a ceasefire or peace process to resolve such crisis", including obstructing humanitarian access to Ethiopia's Tigray region.</p>	<p>Andrea M. Gacki, OFAC Director, while condemning the role played by Eritrea in contributing to the ongoing armed conflict in Northern Ethiopia, stated that the US is "ready to pursue additional actions, including against the Government of Ethiopia and the Tigray People's Liberation Front, if there is not tangible progress toward a cessation of hostilities."</p> <p>The designation of the Eritrean Defense Force (EDF) comes amid reports of looting, SGBV, unlawful killings and blocking of humanitarian aid in Ethiopia's Tigray region, described in the press release announcing the designations as "disguised in old Ethiopian military uniforms, manning checkpoints, obstructing and occupying critical aid routes, and threatening medical staff in one of northern Ethiopia's few operating hospitals".</p>

<p>Myanmar (Burma)</p>	<p>SDN designation of the State Administrative Council (SAC) and individuals connected to Burma's military regime (Treasury Dep't, February 11, 2021 through May 17, 2021)</p> <p>Status: Active</p>	<p>The State Administrative Council (SAC) is designated for being a political subdivision, agency, or instrumentality of the Government of Burma. The SAC, which is the official name of the military government in Burma, was formed by Burma's military on February 2, 2021.</p> <p>Thirteen of the individuals sanctioned are key members of Burma's military regime, which is violently repressing the pro-democracy movement in the country and is responsible for the ongoing violent and lethal attacks against the people of Burma, including the killing of children. Those individuals are: SAC member Mahn Nyein Maung, SAC member Thein Nyunt, SAC member Sai Lone Saing, SAC member Khin Maung Swe, Minister of International Cooperation Ko Ko Hlaing, Minister for Ethnic Affairs Tun Aung Myint, Minister of Border Affairs Tun Tun Naung, governor of the Central Bank of Burma Than Nyein, Minister of Commerce Pwint San, Minister for Planning, Finance, and Industry Win Shein, chairman of the military-appointed Union Election Commission Thein Soe, Minister of Health and Sports Thet Khaing Win, and Minister of Natural Resources and Environment Conservation Khin Maung Yi. The other three individuals are adult children of previously designated senior Burmese military officials. Those individuals are: Hein Htet and Kaung Htet (adult children of SAC member General Maung Maung Kyaw) and Yin Min Thu (adult child of SAC member Admiral Tin Aung San).</p> <p>The following individuals were designated by the Treasury Department on February 11, 2021, as persons who are or were leaders or officials of the military or security forces of Burman, including: Commander-in-Chief Min Aung Hlaing, Deputy Commander-in-Chief Soe Win, First Vice President and retired Lieutenant General Myint Swe, Lieutenant General Sein Win, Lieutenant General Soe Htut, Lieutenant General Ye Aung, General Mya Tun Oo, Admiral Tin Aung San, Lieutenant General Ye Win Oo, and Lieutenant General Aung Lin Dwe.</p>	<p>"Burma's military continues to commit human rights abuses and oppress the people of Burma. Today's action demonstrates the United States' commitment to work with our international partners to press the Burmese military and promote accountability for those responsible for the coup and ongoing violence," said Andrea Gacki, Director of the Office of Foreign Assets Control.</p> <p>On March 20, 2021, Secretary of State Antony Blinken stated: "We condemn these horrific attacks. We condemn the ongoing arrests and the detentions of more than 1,700 political leaders, doctors, human rights defenders, journalists, union leaders, and regular people exercising their rights. And we condemn the military leadership that has enabled this violence against its own people."</p> <p>Though the coup and subsequent human rights violations in Myanmar (Burma) do not directly impact starvation, detention of doctors and other human rights leaders will likely impact the humanitarian condition in the region.</p>
<p>Myanmar (Burma)</p>	<p>SDN Designation of Commander-in-Chief Min Aung Hlaing (Treasury Dep't, December 10, 2019)</p> <p>Status: Active</p>	<p>OFAC designated Commander-in-Chief Min Aung Hlaing, Deputy Commander-in-Chief Soe Win, leader of the 99th Light Infantry Division ("LID") Than Oo, and leader of the 33rd LID Aung Aung.</p> <p>Min Aung Hlaing's military forces were responsible for the brutal security operation in Rakhine State causing more than 500,000 people to flee Bangladesh. During that time, members of ethnic minority groups were killed or injured by gunshot or by soldiers using large-bladed weapons; others were burned to death in their own houses. According to the Treasury department, there are credible claims of mass-scale rape and other forms of sexual violence committed by soldiers under Min Aung Hlaing's command.</p>	<p>The U.S. government's position is that abuses in Burma/Myanmar and the continuing impunity must stop for Burma, including in the northern Rakhine, Kachin and Shan States to transition to a more secure, stable, democratic, peaceful and prosperous nation. The Department of the Treasury's press release refers to crimes that directly result in starvation, including attacks on villagers, threats of sexual violence, as well as forced disappearances.</p>

		<p>Soe Win was heavily involved in the decision to deploy combat divisions to Rakhine State and military units responsible for some of the most serious violence including many instances of sexual violence reported to Soe Win.</p> <p>Than Oo was designated for leading the 99th LID which was responsible for serious human rights abuses including forcing hundreds of men and women to a riverbank where the 99th LID opened fire executing many of the men and forced women and girls to nearby houses where they were sexually assaulted, and some were stabbed and beaten. They also set fire to the houses while they were inside.</p> <p>Aung Aung was designated for leading the 334d LID which has participated in extrajudicial killings, forced disappearances, and sexual violence as well as firing on fleeing villagers.</p>	
Myanmar (Burma)	<p>Designation of Commander-in-Chief Min Aung Hlaing under Section 7031(c) of the FY 2019 Department of State, Foreign Operations, and Related Programs Act (State Dep't, July 16, 2019)</p> <p>Status: Active</p>	<p>The Department of State designated Commander-in-Chief Min Aung Hlaing, Deputy Commander-in-Chief Soe Win, Brigadier General Than Oo, and Brigadier General Aung Aung after determining that the individuals were involved in gross violations of human rights including, in part, releasing soldiers convicted of extrajudicial killings at Inn Din during the ethnic cleansing of Rohingya. The Commander-in-Chief released the soldiers after only a few months in prison.</p>	<p>Section 31(c) of the Appropriations Act provides that in cases where the Secretary of State has credible information that officials of foreign governments have been involved in significant corruption or gross violations of human rights, those individuals and their immediate family members are ineligible for entry into the United States.</p> <p>The State Department's special briefing states, "These four senior officials are well-known to the international community to be responsible for gross human rights violations across the country, not only in Rakhine State but also in Kachin and Shan states over the past decade. They are specifically cited by the UN factfinding mission as being among the six senior officers bearing considerable command responsibility for human rights violations and crimes."</p> <p>This designation generally covers gross human rights violations without specific reference to underlying crimes. Thus, starvation and humanitarian access-related crimes were likely included in the decision to implement these designations.</p>
Myanmar (Burma)	<p>SDN designation of four Burmese Military and Border Guard Police commanders and two Burmese military units (Treasury Dep't, August 17, 2018)</p> <p>Status: Active</p>	<p>OFAC sanctioned Burmese military commanders Aung Kyaw Zaw, Khin Maung Soe, Khin Hlaing, and Border Guard Police Commander Thura San Lwin, along with the 33rd Light Infantry Division and the 99th Light Infantry Division pursuant to Executive Order 13818.</p> <p>Beginning in October 2016, the Burmese military committed widespread, systematic, and brutal acts of violence against Rohingya villagers across northern Rakhine State's three townships—Maundaw, Buthidaung, and Rathedaung. The violence increased substantially through sweeping military operations that responded to deadly militant attacks on August 25, 2017 that targeted Burmese border security posts. In November 2017 the Administration determined</p>	<p>Executive Order 13818 builds upon the Global Magnitsky Human Rights Accountability Act of 2016 to target perpetrators of serious human rights abuse and corruption.</p> <p>Though starvation and humanitarian access are not directly referenced in the Department of the Treasury's press release, the referenced brutal acts against Rohingya villagers includes crimes that are likely resulting, directly, in human rights violations including starvation.</p> <p>"Treasury is sanctioning units and leaders overseeing this horrific behavior as part of a broader U.S. government strategy to hold</p>

		<p>that the situation in northern Rakhine constituted ethnic cleansing against the Rohingya.</p> <p>According to the Treasury Department press release, Burmese security forces have engaged in ethnic cleansing, massacres, sexual assault, extrajudicial killings, and other serious human rights abuses. The military has also committed enforced disappearances, arbitrary arrests, and torture against civilians from minority communities, including the Kachin, Shan, Ta'ang, Kokang, and other groups.</p>	<p>accountable those responsible for such wide scale human suffering," said Sigal Mandelker, Treasury Under Secretary for Terrorism and Financial Intelligence. "There must be justice for the victims and those who work to uncover these atrocities, with those responsible held to account for these abhorrent crimes. The U.S. government is committed to ensuring that Burmese military units and leaders reckon with and put a stop to these brutal acts. We will continue to systematically expose and bring accountability to human rights abusers in this region and many others and greatly appreciate the efforts of civil society who are doing the same."</p>
Myanmar (Burma)	<p>SDN Designation of Maung Maung Soe (Treasury Dep't, December 21, 2017)</p> <p>Status: Active</p>	<p>In his former role as chief of the Burmese Army's Western command, Maung Maung Soe oversaw the military operation in Burma's Rakhine State. Maung Maung Soe's activities included involvement with Burmese security forces' extrajudicial killings, sexual violence, arbitrary arrest and the widespread burning of villages.</p>	<p>The Treasury Department's press release regarding the designation illustrates the U.S. strong opposition against human rights abuse and corruption globally.</p>
Myanmar (Burma)	<p>Department of the Treasury Implements Termination of Burma Sanctions Program (Treasury Dep't, October 7, 2016)</p>	<p>Following the Executive Order by President Obama terminating the national emergency with respect to Burma, revoking the Burma sanctions Executive Orders, and waiving other statutory blocking and financial sanctions on Burma, the economic and financial sanctions administered by OFAC are no longer in effect.</p> <p>"Burma has made significant strides in recent years, including choosing a civilian-led, democratically elected government," said Adam J. Szubin, Acting Under Secretary for Terrorism and Financial Intelligence at the U.S. Department of the Treasury. "Lifting economic and financial sanctions will further support trade and economic growth, and Treasury will continue to work with Burma to implement a robust anti-money laundering regime that will help to ensure the security of its financial system."</p>	<p>The Department of the Treasury notes that the termination of the Burma sanctions program fulfills the announcement made by President Obama during the visit of State Counsellor Aung San Suu Kyi, and "stands as a testament to the far-reaching changes that Burma has undergone in the past few years, and are intended to support efforts by the civilian government and the people of Burma to continue their process of political reform and broad-based economic growth and prosperity."</p> <p>Though this action terminates all OFAC-administered restrictions and authorizations under the Burma sanctions program pertaining to banking with Burma, sanctions designations against individuals for human rights related violations are still in force. Specifically, the announcement by the Department of the Treasury states, "The termination of the Burma sanctions program does not impact Burmese individuals or entities blocked pursuant to other OFAC sanctions authorities, such as counter-narcotics sanctions. They remain on the SDN List, and their property and interests in property remain blocked." Thus, OFAC may continue to designate individuals for starvation and humanitarian access-related crimes.</p>
Nigeria	<p>SDN Designations of Senior Boko Haram Leaders (Treasury Dep't, December 1, 2015)</p> <p>Status: Active</p>	<p>OFAC sanctioned Mohammed Nur (Nur) and Mustapha Chad (Chad) for their involvement in Boko Haram. Nur was designated for supporting Boko Haram's campaign of violence against the government of Nigeria and for organizing the August 26, 2011 suicide attack on the UN headquarters in Abuja Nigeria. Chad was designated for acting on behalf of Boko Haram. Chad directed activities in the Yobe State in northern Nigeria and spearheaded a 2013 Boko Haram offensive with 2,000 fighters to take over Maiduguri, Nigeria.</p> <p>Boko Haram caused thousands of migrants to flee their homes, resulting in widespread starvation and illness at an aid camp in north-east Nigeria in 2015 and 2016.</p>	<p>Notably, these were the last Nigeria human rights-related sanctions designations since 2015.</p>

Somalia	<p>Reissuance of the Somalia Sanctions Regulations by the Department of the Treasury (Treasury Dep't, April 28, 2021)</p>	<p>The regulations permit sanctions on individuals identified by the Secretary of State: (A) To have engaged in acts that directly or indirectly threaten the peace, security, or stability</p> <p>of Somalia, including: (1) Acts that threaten the Djibouti Agreement of August 18, 2008, or the political process; or (2) acts that threaten the Transitional Federal Institutions, the African Union Mission in Somalia (AMISOM), or other international peacekeeping operations related to Somalia; (B) to have obstructed the delivery of humanitarian assistance to Somalia, or access to, or distribution of, humanitarian assistance in Somalia[.]</p>	<p>The Department of the Treasury's Office of Foreign Assets Control (OFAC) amended the Somalia Sanctions Regulations and reissued them in their entirety to further implement an April 12, 2010 Somalia-related Executive Order, and to implement a July 20, 2012 Somalia-related Executive Order. This final rule replaced the regulations that were published in abbreviated form on May 5, 2010 and included additional interpretive and definitional guidance, general licenses, statements of licensing policy, and other regulatory provisions that will provide further guidance to the public.</p>
Somalia	<p>Designations of Abdullahi Osman Mohamed and Maalim Ayman (State Dep't, November 17, 2020)</p> <p>Status: Active</p>	<p>The Department of State has designated Abdullahi Osman Mohamed and Maalim Ayman, senior leaders of al-Shabaab, the Somalia-based al-Qa'ida affiliate, as Specially Designated Global Terrorists (SDGTs) under section 1(a)(ii)(B) of Executive Order (E.O.) 13224.</p> <p>Abdullahi Osman Mohamed, a senior al-Shabaab official also known as "Engineer Ismail," is the terrorist group's senior explosives expert responsible for the overall management of al-Shabaab's explosives operations and manufacturing. He is also a special adviser to the so-called "emir" of al-Shabaab and is the leader of al-Shabaab's media wing, al-Kataib. Maalim Ayman is the leader of Jaysh Ayman, an al-Shabaab unit conducting terrorist attacks and operations in Kenya and Somalia. Ayman was responsible for preparing the January 2020 attack on Camp Simba in Manda Bay, Kenya, that killed one U.S. military service member and two American contractors.</p>	<p>The State Department press release states: Al-Shabaab, which the Department of State designated as a Foreign Terrorist Organization and SDGT in March 2008, is one of al-Qa'ida's most dangerous affiliates. It continues to threaten the peace, security, and stability of Somalia, as well as Kenya. The U.S. Government is committed to disrupting the illicit financing methods of al-Shabaab, limiting its ability to conduct further attacks against civilians, and supporting the Federal Government of Somalia in disrupting terrorism finance. Addressing the al-Shabaab threat will require working closely with our partners to degrade the terrorist group's capacity and operations, combatting its control and influence in East Africa.</p> <p>These designations are a continuation of the U.S. government's efforts to prevent further human rights violations by the Al-Shabaab organization. For a discussion of Al-Shabaab's starvation and humanitarian assistance-related crimes, see the GRC's UN Sanctions Digest for actions relating to Somalia.</p>
Somalia	<p>Blocking Property of Certain Persons Contributing to the Conflict in Somalia (Executive Order 13536, April 13, 2010, and renewed on April 3, 2020).</p> <p>Status: Active (unless noted otherwise)</p>	<p>President Obama blocked the property and interests in property of:</p> <ol style="list-style-type: none"> 1. Abshir Abdillahi 2. Hassan Abdullah Hersi Al-Turki 3. Hassan Dahir Aweys 4. Ahmed Abdi Aw-Mohamed – senior leader of al-Shabaab 5. Yasin Ali Baynah – incited attacks that threaten the peace and security of Somalia, including rejection of the Djibouti Agreement. 6. Mohamed Abdi Garaad 7. Faud Mohamed Khalaf (Inactive) – facilitated financial support to al-Shabaab and directed vehicle borne explosive device attacks on Ethiopian bases 8. Bashir Mohamed Mahamoud (deceased) – Military Commander of Al-Shabaab 9. Fares Mohammed Mana'a 10. Mohamed Sa'id – one of the principal suppliers of arms and ammunition for Al-Shabaab operations. His forces were responsible for multiple kidnappings and a bombing of Ethiopian migrants. 	<p>The U.S. Department of State named Al-Shabaab as a Foreign Terrorist Organization and a Specially Designated Global Terrorist on February 26, 2008.</p> <p>These designations are a continuation of the U.S. government's efforts to prevent further human rights violations by the Al-Shabaab organization. For a discussion of Al-Shabaab's starvation and humanitarian assistance-related crimes, see the GRC's UN Sanctions Digest for actions relating to Somalia.</p>

<p>South Sudan</p>	<p>SDN Designation of Vice President Taban Deng Gai (Treasury Dep't, January 8, 2020)</p> <p>Status: Active</p>	<p>OFAC sanctioned Taban Deng Gai for his involvement in serious human rights abuses. Since 2018, Deng is viewed by OFAC as being responsible for, being complicit in, or having directly/ indirectly engaged in serious human rights abuses including the murder, rape, and abduction of hundreds of civilians, including in clashes in December 2019. More than 50,000 civilians have fled their homes as a result of the violence, according to the UN.</p> <p>OFAC noted, "The U.S. Government will not hesitate to target those who have perpetuated the conflict in South Sudan and will continue to apply pressure on the senior leadership of South Sudan to take concrete measures to bring peace and stability to the country."</p>	<p>The Department of the Treasury's press release regarding the designation illustrates how the U.S. is responsive to the UN's reports regarding human rights violations including starvation and restrictions on humanitarian access.</p>
<p>South Sudan</p>	<p>SDN Designation of Abud Stephen Thiongkol and other South Sudanese security forces members (Treasury Dep't, December 10, 2019)</p> <p>Status: Active</p>	<p>OFAC Sanctioned Abud Stephen Thiongkol (Thiongkol) for being a leader of an entity that has engaged in serious human rights abuse. OFAC identified Thiongkol as the commander of detention facilities Aggrey Idri and Dong Samuel, two human rights activists, were held prior to their extrajudicial killings.</p> <p>OFAC also designated the following individuals:</p> <ul style="list-style-type: none"> - Malual Dhal Muorwel (Muorwell) – participated in the killings of Dong and Aggrey and was identified as the commander of forces who detained and assaulted three international monitors - Michael Kuajien (Kuajien) – one of two people identified as being present in Kenya during and having a hand in kidnapping Dong and Aggrey - John Top Lam (Lam) – one of two people publicly identified as being present in Kenya during, and having a hand in the kidnapping of Dong and Aggrey. Lam is reported to have called a member of Dong's family in order to provide information on Dong's whereabouts in return for a substantial cash payment - Angelo Kuot Garang (Garang) – identified as having been involved in the killing of Dong and Aggrey as well as of other individuals. <p>The U.S. government stated that the South Sudanese Government repeatedly used extrajudicial killings as a means to silence dissent, limit freedom of speech and the press, and enforce the political status quo. The Treasury Department undertook these designations to address the South Sudanese government's unwilling to create political space for dissenting voices.</p>	<p>Though these designations were made pursuant to Executive Order 13818, which builds upon the Global Magnitsky Human Rights Accountability Act of 2016 to target perpetrators of serious human rights abuse and corruption, starvation and humanitarian access-related crimes are likely not motivating factors.</p> <p>Specifically, the press release states, "The South Sudanese Government has repeatedly used extrajudicial killings as a means to silence dissent, limit freedom of speech and the press, and enforce the political status quo. Its refusal to create political space for dissenting voices — be they from opposition parties, civil society, or media — is a major factor in the country's inability to implement its peace deal and form a national unity government. The Treasury Department is taking action against five individuals responsible for the abduction and likely murder of two human rights activists in 2017."</p>
<p>South Sudan</p>	<p>SDN Designation of Malek Reuben Riak Rengu and other South Sudanese individuals and entities (Treasury Dep't, September 6, 2017)</p> <p>Status: Active</p>	<p>OFAC sanctioned Malek Reuben Riak Rengu, Michael Makuei Lueth, and Paul Malong Awan, in addition to three companies owned or controlled by Malek Reuben Riak Rengu, pursuant to Executive Order (E.O.) 13664, which authorizes sanctions against persons who threaten the peace, security, or stability of South Sudan. As a result of OFAC's actions, all of these individuals' and entities' assets within U.S. jurisdiction are blocked, and U.S. persons are generally prohibited from engaging in transactions with them.</p>	<p>The crimes noted by OFAC — widespread destruction, targeting of civilians, large population displacement, and numerous human rights abuses — directly result in starvation throughout affected areas.</p>

		<p>Between 2013 and 2016, Malek Reuben held the position of Deputy Chief of Staff for Logistics of the South Sudanese military, known as the SPLA. This position played a central role in weapons procurement for the first several years of the conflict. Malek Reuben was reportedly one of a group of senior security officials responsible for planning the April 2015 offensive in Unity State, which reportedly included widespread destruction, targeting of civilians, large population displacement, and numerous human rights abuses. UN experts determined that ammunition supplied by the SPLA to youth groups was critical in sustaining the offensive. Malek Reuben allegedly supported a hardline position in a mid-2015 meeting of the National Liberation Council, which met and decided to reject a draft peace proposal.</p>	
Sudan	<p>Removal of Sudan's designation as a State Sponsor of Terrorism (State Dep't, December 18, 2020)</p>	<p>"In accordance with sections 1754 (c) and 1768(c) of the National Defense Authorization Act for Fiscal Year 2019 (50 U.S.C. 4813(c) and 4826(c)), I hereby rescind the Determination of August 12, 1993, regarding Sudan, effective December 14, 2020. This action is based upon the considerations contained in the memorandum accompanying the Presidential Report of October 26, 2020, regarding Sudan."</p>	<p>On November 2, 2020, the State Department noted in a press release: "Although there remains more to be done, the United States applauds the dramatic progress that the civilian led transitional government has made in working toward freedom, peace, and justice for the Sudanese people. [...] The President's recent decision to move forward with rescission of Sudan's SST designation reflects the civilian-led transitional government's sustained efforts to make sure there is no support for acts of international terrorism. [...] In recognition of the important steps that the Sudanese government has taken toward peace in Sudan's conflict areas, the United States is committed to working with the Sudanese government and our international partners to identify circumstances that could result in lifting sanctions related to the Darfur conflict at the earliest opportunity. We have already begun consultations at the UN with this objective in mind."</p> <p>For a discussion of starvation and humanitarian assistance-related crimes in Sudan, see the GRC's UN Sanctions Digest for actions relating to Sudan.</p>
Sudan	<p>Removal of the Sudanese Sanctions Regulations and Amendment of the Terrorism List Government Sanctions Regulations (Treasury Dep't, June 29, 2018)</p>	<p>The Department of the Treasury's Office of Foreign Assets Control (OFAC) removed from the Code of Federal Regulations the Sudanese Sanctions Regulations as a result of the revocation of certain provisions of one Executive Order and the entirety of another Executive Order on which the regulations were based.</p>	<p>This action corresponds with the Department of State's October 6, 2017 announcement that "the United States decided to revoke economic sanctions with respect to Sudan and the Government of Sudan under Executive Orders 13067 and 13412, in recognition of the Government of Sudan's sustained positive actions to maintain a cessation of hostilities in conflict areas in Sudan, improve humanitarian access throughout Sudan, and maintain cooperation with the United States on addressing regional conflicts and the threat of terrorism."</p> <p>U.S. persons are no longer prohibited from engaging in transactions with respect to Sudan or the Government of Sudan that were previously prohibited by the Sudanese Sanctions Regulations, 31 C.F.R. part 538 (SSR). However, entities and individuals that were sanctioned pursuant to Executive Orders 13067, 13400, and 13412 remain sanctioned.</p>

Sudan	<p>SDN designation of Persons in Connection with the Conflict in Sudan's Darfur Region (Executive Order 13400, April 26, 2006)</p> <p>Status: Active</p>	<p>President Bush issued Executive Order 13400 blocking the property of persons in connection with the conflict in Sudan's Darfur Region. President Bush cited to the persistence of violence in the Darfur region, particularly against civilians and including sexual violence against women and girls, and by the deterioration of the security situation and its negative impact on humanitarian assistance efforts as reasons for the issuance of the Executive Order.</p> <p>Three individuals, designated on May 29, 2007, were designated for attacking and brutalizing innocent civilians in the region. The Treasury Dep't press release stated that hundreds of thousands of people were killed and more than 2.5 million people were displaced by violence and war.</p>	<p>Notably, these were the last Sudan human rights-related sanctions designations before the termination of the Sudanese Sanctions Regulations in 2018, discussed above.</p> <p>Regarding these sanctions designations, the emergency declared by the President with respect to Sudan in Executive Order 13067, and expanded in Executive Order 13400, has not been terminated. Thus, these designations remain in force.</p>	
Syria	<p>General Licenses ("GLs") within the Syrian Sanctions Regulations issued by OFAC related to humanitarian assistance and trade with Syria</p> <p>Status: Active</p>	<p>§ 542.513 of the Syrian Sanctions Regulations authorizes activities of certain international organizations. Subject to certain narrow limitations, the GL authorizes transactions and activities that are for the conduct of the official business of the United Nations, including its specialized agencies, programmes, funds, and related organizations by employees, contractors, or grantees of those organizations.</p> <p>§ 542.516 of the Syrian Sanctions Regulations authorizes, subject to certain limitations, NGOs to provide certain services in support of, and certain U.S. financial institutions to process transfers of funds in support of, the following not-for-profit activities in Syria: Humanitarian projects that meet basic human needs; Democracy-building; Projects supporting education; Non-commercial development projects directly benefitting the Syrian people; and Activities to support the preservation and protection of cultural heritage sites.</p> <p>§ 542.525 of the Syrian Sanctions Regulations authorizes the exportation, reexportation, sale, or supply, directly or indirectly, from the United States or by a U.S. person, wherever located, to Syria, including the Government of Syria, of services that are ordinarily incident to the exportation or reexportation to Syria, including to the Government of Syria, of non-U.S.- origin food, medicine, and medical devices that would be designated as EAR99 under the Export Administration Regulations (EAR) if it were subject to the EAR.</p>	<p>These general licenses are intended to allow humanitarian assistance to the Syrian people even while the Government of Syria remains blocked via Executive Order 13582 (August 18, 2011).</p>	<p>Humanitarian Exemptions: See the descriptions of the General Licenses to the left.</p>
Syria	<p>Designations of 19 individuals and entities under the Caesar Syria Civilian Protection Act (State Dep't, November 9, 2020)</p> <p>Status: Active</p>	<p>The Department of State and the Department of the Treasury sanctioned 19 individuals and entities under the Caesar Syria Civilian Protection Act of 2019 and other sanctions authorities.</p> <p>"Just over five years ago, on October 30, 2015, Bashar al Assad's forces, backed by Iran and Russia, killed over 70 Syrian civilians, and injured nearly 500 more in the Douma marketplace bombing. Today,</p>	<p>The State Department's sanctions designations respond to the human rights violations that occurred during the Douma marketplace bombing. Such attacks on marketplaces and foodstuffs further starvation-related atrocities.</p> <p>Additionally, the State Department press release notes, "The United States is committed to answering the Syrian people's demand for a</p>	

		the Assad regime continues its futile attempt to impose a military solution to the Syrian conflict. In remembrance of the victims of the brutal Douma marketplace attack and other atrocities committed by the Assad regime, the Department of State is sanctioning the National Defense Forces, a pro-Assad, Iranian-affiliated militia, and one of its commanders, Saqr Rostom, pursuant to Executive Order 13894 for their efforts to obstruct a ceasefire in Syria.”	lasting political solution to the conflict in line with UN Security Council Resolution 2254.”
Syria	<p>Designations of Yasser Ibrahim and several Syrian military units (State Dep’t, August 20, 2020)</p> <p>Status: Active</p>	<p>The United States announced six sanctions against the Assad regime’s military, government, and financial supporters.</p> <p>The State Department imposed sanctions on Assad’s henchman, Yasser Ibrahim, under Executive Order 13894 section 2(a)(i)(D) for his efforts to prevent or obstruct a political solution to the Syrian conflict. Using his networks across the Middle East and beyond, Ibrahim has cut corrupt deals that enrich Assad, while Syrians are dying from a lack of food and medicine.</p> <p>The State Department also designated, pursuant to Executive Order 13894 section 2(a)(i)(A), leadership of several Syrian military units for their efforts to prevent a ceasefire in Syria. In the National Defense Forces, the State Department designated NDF commander Fadi Saqr. In the 4th Division, the State Department designated 42nd Brigade commander, Brigadier General Ghaith Dalah. Finally, in the Tiger Forces the State Department designated the Haider Regiment commander, Samer Ismail.</p>	<p>The State Department’s sanctions designations specifically refer to crimes against Syrians that result in starvation. The press release also notes that the U.S. will enforce sanctions against those who continue to commit such human rights violations.</p> <p>“These senior officials lead the same Syrian military that has killed children with barrel bombs and used chemicals [sic] weapons against communities like Ghouta. They have shattered the social contract between citizens and the military sworn to protect them. Today’s sanctions reinforce our commitment to hold Assad’s generals and militia commanders accountable for their violations and abuses. We will aggressively pursue sanctions against other Syrian military commanders, as well as enforce existing U.S. sanctions against many current and retired commanders such as Lieutenant General Ali Ayoub, Major General Ali Mamluk, Brigadier General Bassam Al-Hassan, Major General Jamil Hassan, Major General Mohammad Dib Zaitoun, Brigadier General Suheil Hassan, Major General Rafiq Shahadah, and Major General Abd al-Fatah Qudsiyah. We will also support the sanctions our EU allies have levied against Assad’s military, including Major General Kifah Melhem, Brigadier General Nasser al-Ali, Major General Ghassan Ismail, Major General Hussam Luka, and militia commander Saqr Rustom. These brutal leaders of Assad’s war machine should have no role in Syria’s future.”</p> <p>These sanctions were implemented pursuant to the goals of the Caesar Syria Civilian Protection Act, which was signed into law on December 20, 2019.</p>
Syria	<p>Designation of 14 individuals under the Caesar Syria Civilian Protection Act (State Dep’t, July 29, 2020)</p> <p>Status: Active</p>	<p>The State Department and Treasury Department continued the United States’ sanctions campaign against the Assad regime by releasing 14 new designations under the Caesar Syria Civilian Protection Act and other authorities. These sanctions respond to the 2019 bombing by the Assad regime and its allies of a busy marketplace in Maarat Al-Numan, killing 42 innocent Syrians, and the 2011 attack on the city of Hama</p> <p>“The Assad regime’s military has become a symbol of brutality, repression, and corruption. They have killed hundreds of thousands of civilians, detained and tortured peaceful protesters, and destroyed schools, hospitals, and markets without regard to human life. We are designating Zuhair Tawfiq al-Assad and the First</p>	<p>These sanctions designations respond to attacks on marketplaces and cities; human rights violations directly tied to starvation in Syria.</p>

		Division of the Syrian Arab Army pursuant to E.O. 13894 Section 2(a)(i)(A), in addition to Zuhair Tawfiq al Assad's adult son, Karam al-Assad , under Section 2(a)(ii). Among today's actions, we are also designating Bashar al-Assad's adult son Hafez al-Assad pursuant to E.O. 13894 Section 2(a)(ii). We will continue to hold Bashar al-Assad and his regime accountable for their atrocities, while keeping the memory of their victims alive."	
Syria	SDN Designation of Investors Supporting Assad Regime's Corrupt Reconstruction Efforts (Treasury Dep't, June 17, 2020) Status: Active	OFAC designated 24 individuals and entities under the Caesar Syria Civilian Protection Act and Executive Order 13894. According to the press release , some of the designations stem from the development of land that was expropriated from Syrians displaced by the regime. "[T]he regime has evicted and razed the property of tens of thousands of residents from areas in Damascus that were until recently working class neighborhoods sympathetic to the opposition...Treasury's action today exposes individuals and entities, including private-public partnerships, that seek to profit from this displacement and reconstruction."	The State Department's corresponding press release states, "For more than nine years, the Assad regime has waged a bloody war against the Syrian people and committed innumerable atrocities, some of which rise to the level of war crimes and crimes against humanity, including killings, torture, enforced disappearances, and the use of chemical weapons. Since the conflict began, more than half a million Syrians have died and eleven million people – half of Syria's pre-war population – have been displaced. Bashar al-Assad and his regime squander tens of millions of dollars each month to fund their needless war, destroying homes, schools, shops, and public markets. Their destructive war has exacerbated the humanitarian crisis, prevented life-saving assistance from reaching those in need, and brought misery to the Syrian people." Thus, these designations specifically respond to forced displacement and the destruction of property in Syria, which directly result in the starvation of Syrian people.
Syria	SDN Designation of Bashar Al-Assad (Executive Order 13573, May 18, 2011) Status: Active	President Barack Obama listed Bashar Al-Assad in the Annex to Executive Order 13573, blocking his property and interests in property. The Executive Order cites the escalation of violence against the people of Syria, including through attacks on protestors, arrests and harassment of protestors and political activists and repression of democratic change, as the justification for imposing sanctions under the Executive Order.	Bashar Al-Assad remains on the Specially Designated Nationals and Blocked Persons List.
Venezuela	General Licenses ("GLs") issued by OFAC related to humanitarian assistance and trade with Venezuela Status: Active	General License 4C authorizes certain transactions ordinarily incident and necessary to the exportation or reexportation of agricultural commodities, medicine, medical devices, replacement parts and components for medical devices, or software updates for medical devices to Venezuela, or to persons in third countries purchasing specifically for resale to Venezuela. General License 20B authorizes official activities of certain international organizations such as the United Nations, including its Programmes and Funds, and its Specialized Agencies and Related Organizations, as well as the International Committee of the Red Cross, among others, to engage in transactions involving BCV, or involving other Government of Venezuela persons to the extent the transactions are subject to U.S. jurisdiction.	These general licenses are intended to allow humanitarian assistance to the Venezuelan people even while the Government of Venezuela remains blocked via Executive Order 13884 (August 5, 2019). Humanitarian Exemptions: See the descriptions of the General Licenses to the left.

		<p>General License 29 authorizes non-governmental organizations to engage in transactions involving the Government of Venezuela in support of humanitarian projects, democracy building, education, non-commercial development projects directly benefiting the Venezuelan people, and environmental protection in Venezuela.</p> <p>General License 33 authorizes, among other activity, all transactions involving the Government of Venezuela necessary to provide air ambulance and related medical services, including medical evacuation from Venezuela, for individuals in Venezuela.</p>	
Venezuela	<p>SDN Designations of Amir Luis Saab Moran and Luis Alberto Saab Moran (Treasury Dep't, September 17, 2019)</p> <p>Status: Active (unless noted otherwise)</p>	<p>OFAC sanctioned Amir Luis Saab Moran ("Amir Saab") and Luis Alberto Saab Moran ("Luis Moran") along with David Enrique Rubio Gonzalez ("Rubio") (Inactive) and 16 entities owned by those individuals for their involvement in corruption to obtain valuable business contracts with the Government of Venezuela. Specifically, OFAC found that the individuals were related to and involved with Alex Saab who was sanctioned on July 25, 2019 for obtaining CLAP-related, no-bid, and overvalued contracts. Instead of ensuring that Venezuela's vulnerable population received food, the Maduro regime used the CLAP program as a means of social control to reward political support and punish criticism.</p> <p>The purpose of the designations was to "increase pressure on Alex Saab and his network, which have profited off the hunger of the Venezuelan people and facilitate systemic corruption in Venezuela."</p>	These sanctions designations specifically seek to punish those who support and profit from the starvation of the Venezuelan people.
Venezuela	<p>Treasury reaffirms commitment to humanitarian support for Venezuelan people</p> <p>(Treasury Dep't, August 6, 2019)</p>	<p>On August 6, 2019, OFAC issued guidance highlighting the United States' commitment to the unfettered flow of humanitarian aid to the Venezuelan people.</p> <p>Specifically, the Treasury Department press release stated that "it is imperative that the international community continues to fully utilize humanitarian exemptions to ensure that food and supplies continue to flow to Venezuelans suffering from Maduro's man-made economic crisis. . . The United States stands with the Venezuelan people and interim President Juan Guaidó in support of efforts to ensure that food, international aid, and resources reach vulnerable Venezuelans."</p>	OFAC's guidance makes clear that the regulations and general licenses allow U.S. persons to continue to provide humanitarian support to the Venezuelan people, including transactions through the U.S. financial system for certain authorized activity related to food, agricultural commodities, medicine, and medical devices.
Venezuela	<p>SDN Designation of Colombian national Alex Nain Saab Moran ("Saab") (Treasury Dep't, July 25, 2019)</p> <p>Status: Active (unless noted otherwise)</p>	<p>OFAC sanctioned Saab for engaging with Nicolas Maduro to run a wide scale corruption network that was used to exploit Venezuela's starving population.</p> <p>OFAC found that Saab was involved in a corruption network that operated the Venezuelan Government's food subsidy program (known as CLAP), which allowed food to be used as a form of social control to reward political supporters and punish opponents, while the parties involved, including Saab pocketed hundreds of millions of dollars.</p>	These sanctions designations specifically seek to punish those who support and profit from the starvation of the Venezuelan people.

		<p>Specifically, SAAB devised a corporate structure for the CLAP program to acquire food from a foreign distributor, assemble it in a foreign country, and ship it to Venezuela at the most profitable rate possible for Saab and his partner. Saab reaped substantial profits and imported only a fraction of the food needed for the CLAP program.</p> <p>Along with SAAB, the following individuals were designated for their participation in the corruption network:</p> <ul style="list-style-type: none"> -Alvaro Enrique Pulido Vargas -Emmanuel Enrique Rubio Gonzalez (Inactive) -Walter Jacob Gavidia Flores -Yosser Daniel Gavidia Flores -Yoswal Alexander Gavidia Flores -Jose Gregoria Vielma Mora (Inactive) -Shadi Nain Saab Certain -Isham Ali Saab Certain -Mariana Andrea Staudinger Lemoine 	
Yemen	<p>SDN Designations of Mansur Al-Sa'adi and Ahmad 'Ali Ahsan al-Hamzi, two key militants of Ansarallah (a.k.a. the Houthis) (Treasury Dep't, March 2, 2021)</p> <p>Status: Active</p>	<p>Houthi Naval Forces Chief of Staff Mansur Al-Sa'adi and commander of Yemen's Houthi-aligned Yemeni Air Force and Air Defense Forces Ahmad 'Ali Ahsan al-Hamzi are responsible for orchestrating attacks by Houthi forces impacting Yemeni civilians, bordering nations, and commercial vessels in international waters. These actions, which were done to advance the Iranian regime's destabilizing agenda, have fueled the Yemeni conflict, displacing more than one million people and pushing Yemen to the brink of famine.</p> <p>According to international human rights organizations, the use of naval mines in the Yemen civil war poses a risk to commercial, fishing, and humanitarian aid vessels.</p>	<p>"The United States condemns the destruction of civilian sites by the Houthi militants designated today. These individuals command forces that are worsening the humanitarian crisis in Yemen," said Director of the Office of Foreign Assets Control Andrea M. Gacki. "The United States remains committed to promoting accountability of Houthi leadership for their actions, which have contributed to the extraordinary suffering of the Yemeni people."</p> <p>Since the onset of the conflict in Yemen, the Houthis, with the support of the Iranian regime, have waged a war against the internationally recognized Yemeni government using ballistic missiles, explosives, naval mines, and unmanned aerial vehicles (UAVs) to attack bases, population centers, infrastructure, and nearby commercial shipping. Iranian support of the Houthis has only prolonged Yemen's civil war and contributed to the widespread suffering of millions of Yemenis in a humanitarian crisis the United Nations called "the worst in the world."</p>
Yemen	<p>Terrorist Designations of Ansarallah (a.k.a. the Houthis) (State Dep't, January 10, 2021) Status: Inactive (unless noted otherwise)</p> <p>(February 16, 2021)</p>	<p>On January 10, 2021, the Department of State designated Ansarallah — sometimes referred to as the Houthis — as a Foreign Terrorist Organization (FTO), under section 219 of the Immigration and Nationality Act, and as a Specially Designated Global Terrorist (SDGT) entity, pursuant to Executive Order 13224. The State Department also designated three of Ansarallah's leaders, Abdul Malik al-Houthi (Active), Abd al-Khaliq Badr al-Din al-Houthi (Active), and Abdullah Yahya al Hakim (Active), as SDGTs. These sanctions designations became effective on January 19, 2021.</p> <p>On February 16, 2021, the Department of State revoked the designations of Ansarallah, and its aliases, as a Foreign Terrorist Organization. The Department of the Treasury subsequently revoked its sanctions designation against Ansarallah.</p>	<p>On February 16, 2021, State Department Spokesperson Ned Price stated, "[W]e do not have second thoughts about the profound humanitarian implications that were at play when it came to the broad designation of Ansarallah. As we have mentioned before, the broad designation, which was finalized in the last hours of the [Trump] administration, was put forward in spite of fierce opposition from members of Congress, from</p> <p>Humanitarian Exemptions: On February 16, 2021, the Treasury Department revoked the following general licenses in response to the revocation of the Ansarallah sanctions designation: General License (GL) 9, "Official Business of the United States Government," GL 10, "Official Activities of Certain International Organizations," GL 11, "Certain Transactions in Support of Nongovernmental Organizations' Activities in</p>

			<p>humanitarian aid organization, from elements of the UN. And of course, we had great concerns with it.”</p> <p>On January 11, 2021, U.S. Representative Gregory W. Meeks, Chairman of the House Foreign Affairs Committee <u>stated</u>, “[T]his designation makes it harder to deliver life-saving assistance in a country already experiencing the worst humanitarian crisis in the world. Food aid, clean water, and basic health care for millions would be severely impacted. People will suffer and die, and those deaths are entirely preventable.”</p> <p>On January 11, 2021, Senate Foreign Relations Committee Chairman Jim Risch and House Foreign Affairs Committee Lead Republican Michael McCaul also <u>stated</u>, “In light of near-famine conditions that have already existed in Yemen, this designation will have a devastating effect on Yemen’s food supply and other critical imports unless the executive branch acts now to issue the necessary licenses, waivers and appropriate guidance prior to designation. Good intentions must not be eclipsed by significant unintended consequences.”</p>	<p>Yemen,” and GL 12, “Transactions Related to the Exportation or Reexportation of Agricultural Commodities, Medicine, Medical Devices, Replacement Parts and Components or Software Updates,” which were issued on January 19, 2021, and GL 13 “Authorizing Transactions Involving Ansarallah,” which was issued on January 25, 2021.</p>
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