



## U.S. Sanctions on Russia: An Overview

The United States imposes sanctions on Russian persons (individuals, entities, and vessels) in response to Russia's invasion of Ukraine, election interference, other malicious cyber-enabled activities, human rights abuses, use of a chemical weapon, weapons proliferation, illicit trade with North Korea, and support to Syria and Venezuela.

Sanctions against Russian persons may include blocking of 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 denial of entry into the United States. The United States also tightly controls exports to Russia's energy and defense sectors. For more, see CRS Report R45415, *U.S. Sanctions on Russia*.

### Invasion of Ukraine

Most U.S. designations of Russian persons subject to sanctions are in response to Russia's 2014 invasion and occupation of Ukraine's Crimea region and areas of eastern Ukraine, as well as its maritime aggression near the Sea of Azov. To date, the United States has imposed Ukraine-related sanctions on more than 665 persons.

The basis for most Ukraine-related sanctions is a series of executive orders (EOs 13660, 13661, 13662, and 13685) that were issued in 2014 and codified by the Countering Russian Influence in Europe and Eurasia Act of 2017 (CRIIEA; P.L. 115-44, Title II; 22 U.S.C. 9501 et seq.). The EOs provide for sanctions against those the President determines have undermined Ukraine's security and stability; misappropriated Ukrainian state assets; or conducted business, trade, or investment in occupied Crimea. They also provide for sanctions against Russian government officials and those who offer them support, persons who operate in the Russian arms sector, and persons who operate in key sectors of the Russian economy.

*Sectoral sanctions*, in particular, apply to specific entities in Russia's financial, energy, and defense sectors. U.S. persons are restricted from engaging in specific transactions with these entities, which are identified as subject to one of four directives. Restrictions apply to new equity investment and financing for identified entities in Russia's financial sector, and new financing for identified entities in Russia's energy and defense sectors. Sectoral sanctions also prohibit U.S. trade related to the development of Russian deepwater, Arctic offshore, or shale projects that have the potential to produce oil and, as amended by CRIIEA, such projects worldwide in which identified entities have an ownership interest of at least 33% or a majority of voting interests.

### Malicious Cyber-Enabled Activities

Sanctions imposed on Russian persons in response to malicious cyber activities are based on two authorities. The

first is EO 13694, as amended by EO 13757 (and codified by CRIIEA). This executive order targets those who engage in cyberattacks (1) against critical infrastructure, (2) for financial or commercial gain, (3) to significantly disrupt the availability of a computer or network, or (4) to interfere with U.S. election processes and institutions.

The second authority is CRIIEA, Section 224, which requires the President to impose sanctions in response to a range of activities conducted on behalf of the Russian government that undermine "cybersecurity against any person, including a democratic institution, or government."

Under these authorities, the United States has designated for election-related malicious cyber activities at least 40 Russian persons, including Russia's leading intelligence agency (FSB) and military intelligence (GRU). Many of these designees have been indicted by the Department of Justice's Special Counsel's Office for crimes related to election interference.

Six of these persons, and at least another 20, also have been designated for other malicious cyber-related activities, including the 2017 "NotPetya" global ransomware attack and cyberattacks against the World Anti-Doping Agency (WADA) and the Organization for the Prohibition of Chemical Weapons (OPCW).

Also in response to malicious cyber-enabled activities, CRIIEA, at Section 231, requires the President to impose sanctions on any person who engages in significant transactions with the Russian defense or intelligence sectors. In September 2018, the Administration designated the Equipment Development Department of China's Central Military Commission, as well as its director, for taking delivery of 10 combat aircraft and surface-to-air missile system-related equipment. Turkey also has begun to take possession of surface-to-air missile systems from Russia. As of August 2019, the Trump Administration has not imposed Section 231 sanctions in response.

### Human Rights Abuse and Corruption

The Sergei Magnitsky Rule of Law Accountability Act of 2012 (P.L. 112-208, Title IV; 22 U.S.C. 5811 note) requires the President to impose sanctions on persons he identifies as having been involved in a "criminal conspiracy" uncovered by Russian lawyer Sergei Magnitsky or his subsequent imprisonment and death. The act also requires the President to impose sanctions on those he finds have committed human rights abuses against individuals who are fighting to expose the illegal activity of Russian government officials or seeking internationally recognized human rights and freedoms.

Fifty-five persons are designated under the Sergei Magnitsky Act. Other Russian persons have been designated under the Global Magnitsky Human Rights Accountability Act (P.L. 114-328, Title XII, Subtitle F; 22 U.S.C. 2656 note) and EO 13818, which address human rights abuses and corruption more broadly.

The Support for the Sovereignty, Integrity, Democracy, and Economic Stability of Ukraine Act of 2014, as amended by §228 of CRIIEA (SSIDES; P.L. 113-95; 22 U.S.C. 8901 et seq.), requires sanctions on those responsible for serious human rights abuses in “any territory forcibly occupied or otherwise controlled” by Russia. In November 2018, the Administration designated three persons for human rights abuses in Russian-occupied regions of Ukraine.

### Use of a Chemical Weapon

In August 2018, the United States determined that Russia used a chemical weapon in contravention of international law in relation to the March 2018 nerve agent attack on 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 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.).

Pursuant to the CBW Act, the President has imposed two rounds of sanctions on Russia. As of August 2019, these include prohibitions on exporting many controlled goods and services, lending non-ruble-denominated funds to the Russian government, and participating in the primary market for non-ruble-denominated sovereign bonds. In addition, the Trump Administration has designated two GRU officers for their involvement in the nerve agent attack. For more, see CRS In Focus IF10962, *Russia, the Skripal Poisoning, and U.S. Sanctions*.

### Weapons Proliferation

Pursuant to the Iran, North Korea, and Syria Nonproliferation Act, as amended (INKSNA, P.L. 106-178; 50 U.S.C. 1701 note), state-owned arms exporter Rosoboronexport and some other Russian defense entities are denied most U.S. government procurement contracts, export licenses, and trade in U.S. Munitions List-controlled items. In April 2018, the Trump Administration designated Rosoboronexport for providing support to the Syrian government. In addition, Rosoboronexport is subject to Ukraine-related sectoral sanctions and other restrictions that prohibit U.S. government contracts and other transactions.

### North Korea Sanctions Violations

The Trump Administration has designated at least 22 Russia-related persons for evading sanctions that restrict trade and financial transactions with North Korea. In 2017, the Administration designated seven persons under EO 13722 for trade in petroleum with North Korea. The Administration designated another four persons under EOs 12938 and 13382 for providing supplies and procuring metals to a North Korean company subject to sanctions for its weapons of mass destruction programs. In 2018, the Administration designated 10 persons for facilitating trade with North Korea, including through “ship-to-ship transfer

of refined petroleum products,” under EO 13722 and EO 13810. In June 2019, the Administration designated a Russian institution for providing financial services to North Korea’s primary foreign exchange bank under EO 13382.

### Syria- and Venezuela-Related Sanctions

The Trump Administration designated Rosoboronexport and an associated bank for their support to the Syrian government under EO 13582 in 2018, adding to the Obama Administration’s designation of two Russian banks and related individuals under the same EO.

In March 2019, the Administration designated a bank that is jointly owned by Russian and Venezuelan state-owned companies under EO 13850 for providing support to Venezuela’s state-owned oil company, Petroleos de Venezuela, S.A. (PdVSA), which the Administration designated in January 2019 to curb the availability of resources to the regime of Nicolas Maduro.

### Other Sanctions and Restrictions

In addition to imposing export-licensing restrictions on Russian persons in response to Russia’s invasion of Ukraine, the Department of Commerce imposes such restrictions on other Russian persons that engage in activities considered contrary to U.S. national security and/or foreign policy interests. In December 2017, Commerce imposed restrictions on two entities for producing a ground-launched cruise missile system and associated launcher in violation of the Intermediate-Range Nuclear Forces Treaty.

As in past years, FY2019 appropriations for national defense, energy, and foreign operations programs restrict assistance to the Russian government. The State Department’s 2019 Trafficking in Persons Report identifies Russia as a Tier 3 nation that fails to meet minimum standards for the elimination of human trafficking. This designation requires limits on aid and cultural exchanges.

Around three dozen Russian persons currently are designated under global sanctions regimes related to terrorism and transnational crime.

### Other Available Sanctions

As of August 2019, the Administration has not made designations under other new CRIIEA authorities related to pipeline development, privatization deals, or support to Syria (§§232-234). The Administration also has not made other designations under SSIDES or the Ukraine Freedom Support Act of 2014 (UFSA; P.L. 113-272; 22 U.S.C. 8921 et seq.; as amended by CRIIEA, §§225-228) related to weapons transfers abroad, certain oil projects, corruption, and secondary sanctions against foreign persons that facilitate significant transactions or sanctions evasion for Russia-related designees. Some Members of Congress have called on the President to make more designations based on CRIIEA’s mandatory sanctions provisions.

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