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U.S. Sanctions on Russia: An Overview

The United States imposes sanctions on Russian persons (individuals, entities, and vessels) in response to Russia's 2014 invasion of Ukraine, election interference, malicious cyber-enabled activities, human rights abuses, use of a chemical weapon, weapons proliferation, illicit trade with North Korea, and support to Syria.

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 annexation of Ukraine's Crimea region and Russia's fostering of conflict in eastern Ukraine. To date, the United States has imposed Ukraine-related sanctions on more than 650 persons.

The basis for 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 any 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 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; new financing for identified entities in Russia's energy sector; and new financing for identified entities in Russia's defense sector. Sectoral sanctions also prohibit U.S. trade with identified entities 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 those 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.

In December 2016, the Obama Administration designated for election-related malicious cyber activities nine persons, including Russia's leading intelligence agency (FSB) and military intelligence (GRU). Two other persons were designated for financial-related cyber activities.

In March 2018, the Trump Administration designated 16 persons for election interference. In June and August 2018, the Trump Administration designated 12 more persons it referred to as FSB enablers. In December 2018, it designated another six persons for election interference. Many of these designees also have been indicted by the Department of Justice's Special Counsel's Office for crimes related to election interference.

CRIIEA, at Section 224, enlarged the scope of cyber-related activities subject to sanctions to include a range of activities conducted on behalf of the Russian government that undermine "cybersecurity against any person, including a democratic institution, or government." In March 2018, the Trump Administration designated, pursuant to Section 224, six persons previously designated under EO 13694, as well as two others, for the 2017 "NotPetya" global ransomware attack. In June 2018, the Administration designated one more entity under Section 224. In December 2018, the Administration designated 13 GRU officers for election interference or cyber operations against the World Anti-Doping Agency (WADA) and the Organization for the Prohibition of Chemical Weapons (OPCW). All these officers also have been indicted by the Department of Justice for related crimes.

To deter further Russian malicious cyber-enabled activities, CRIIEA, at Section 231, requires secondary sanctions on persons that engage 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.

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 either 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.

Forty-nine 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 (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 the Russian government. 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 and 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.).

The CBW Act requires the President to terminate most foreign aid, arms sales, export licenses for controlled goods and services, and government-backed financial assistance. A second round of sanctions could affect U.S. import and export of goods and services other than food or agriculture, access to U.S. banks, U.S. support for Russia in the international financial institutions, and diplomatic relations. For more, see CRS In Focus IF10962, *Russia, the Skripal Poisoning, and U.S. Sanctions*.

In December 2018, the Trump Administration designated two GRU officers for the attempted assassination of Sergei Skripal and his daughter under cyber-related sanctions authority provided in Section 224 of CRIIEA.

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 six 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, Rosoboronexport was designated 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

In 2017, the Administration designated seven Russia-related persons under EO 13722 for trade in petroleum with North Korea. The Administration also designated four Russian 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 August and September 2018, the Administration designated 10 more persons for facilitating trade with North Korea, including through “ship-to-ship transfer of refined petroleum products,” under EO 13722 and EO 13810.

Syria

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

Other Sanctions and Restrictions

In addition to Ukraine-related restrictions, the Department of Commerce imposes export-licensing restrictions on Russian persons that engage in activities considered contrary to U.S. national security and/or foreign policy interests. In December 2017, restrictions were imposed 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, FY2018 and FY2019 national defense, energy, and foreign operations appropriations restrict assistance to the Russian government. The State Department’s 2018 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 December 2018, 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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