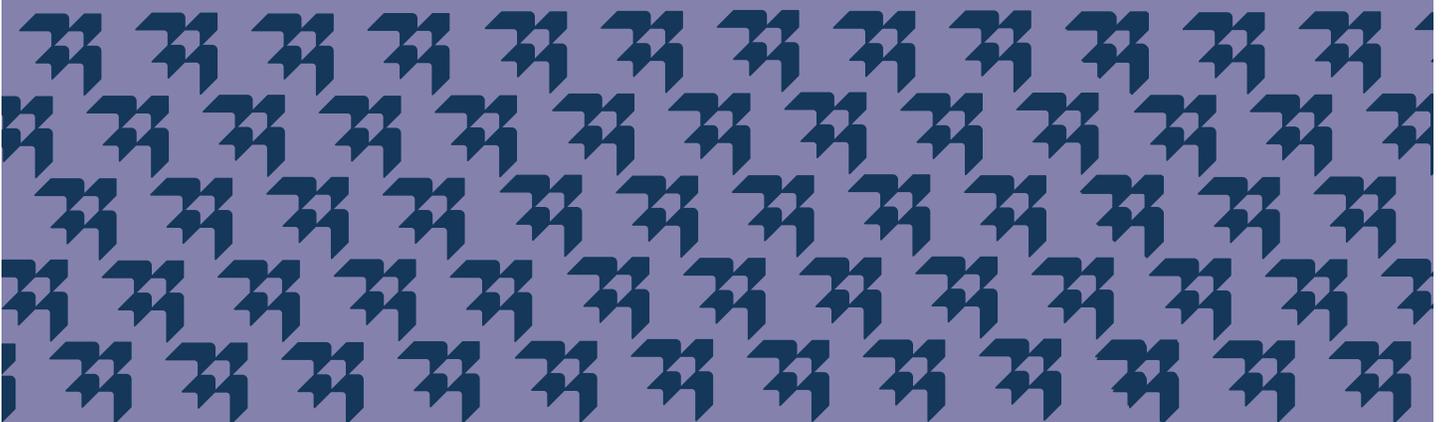




U.S. Global Magnitsky and Related Sanctions

END OF YEAR UPDATE



JULY 1, 2025 – DECEMBER 31, 2025

This briefing provides an overview of recent developments in the U.S. government’s use of its targeted human rights and anticorruption sanctions programs from July 1, 2025 to December 31, 2025.

Notable Developments and Patterns of Use

Infrequent Use of Targeted Human Rights and Corruption Sanctions: In the past six months, the Trump administration has continued to use Global Magnitsky sanctions and related sanctions programs significantly less than the Biden and first Trump administrations. Only six targets have been sanctioned under the Global Magnitsky program since this administration took office, and three of those – whose sanctioning was an abuse of this program, as discussed further below – have since been delisted. Similarly, only 23 foreign government officials and their family members have been publicly sanctioned under the Section 7031(c) visa restriction program in that period. The past year marks the lowest annual use of these two programs on record. The deprioritization of these important accountability tools aligns with the Trump administration’s narrowing or outright dismantling of the U.S. government’s human rights and anticorruption work more broadly.

Inappropriate Uses of Global Magnitsky Sanctions: Several recent actions taken by the Trump administration under the Global Magnitsky program during this period have raised concerns that the program is being inappropriately used in pursuit of impunity for friends, rather than for accountability. For example, in July, Brazilian Federal Supreme Court Justice [Alexandre de Moraes](#) was sanctioned seemingly in [retaliation](#) for overseeing the criminal case against former Brazilian President and Trump ally Jair Bolsonaro and [legal actions](#) taken against Elon Musk’s companies for failure to comply with Brazilian law and court orders. The sanctions followed the State Department’s [visa ban](#) against Justice de Moraes under Section 212(a)(3)(C) of the Immigration and Nationality Act (INA), the public announcement of which violated U.S. law. Human Rights First [criticized](#) these sanctions as advancing “the administration’s pursuit of impunity for close political allies.” The administration later [sanctioned](#) de Moraes’ wife and a holding company, before removing the sanctions on all three several months later, after relations between the Trump administration and Brazil had warmed.

The Trump administration has also removed Global Magnitsky sanctions at an unusually high rate, doing so without providing substantive explanations related to the Global Magnitsky program's accountability goals. Such delistings included the removal of senior Hungarian minister [Antal Rogan](#) in April and former Paraguayan President [Horacio Manuel Cartes Jara](#) and related companies in October. Both Rogan and Cartes have been key figures in conservative political parties in their respective countries, contributing to perceptions that the delistings had purely political motivations.

Disregarding Legal Requirements for Visa Restrictions and Sanctions: The Trump administration has repeatedly failed to adhere to statutorily mandated restrictions on the use of visa bans and sanctions delisting requirements.

- **Violations of Visa Confidentiality:** [Federal law](#) prohibits the disclosure of the specific individuals barred from entry into the United States under Section 212(a)(3)(C) visa ban policies, yet the State Department has violated visa confidentiality requirements and identified persons determined to be ineligible for a U.S. visa on at least four occasions during the reporting period. In three of these instances, the Department's official press release included the names of those affected by the announced actions. These include actions against [Justice de Moraes, Brazilian Ministry of Health officials](#), and Honduran national [Marlon Ochoa](#). In another instance, the identities of the targeted individuals, including former European Commissioner Thierry Breton, were [disclosed by a Department official](#) via social media. When asked about some of these apparent violations, State Department officials have not responded.
- **Failure to Follow Global Magnitsky Delisting Requirements:** The Trump administration has also failed to provide the statutorily required notice to Congress before terminating Global Magnitsky sanctions. When former Paraguayan President Cartes was [delisted](#) in October, Senators Shaheen, Kaine, and Warren published a [letter](#) criticizing the lack of advance notice provided to Congress. This follows the administration's similar [failure](#) to give the required notice before the [delisting](#) of Hungarian minister Rogan in April (and Brazilian justice de Moraes in December, though these sanctions were inappropriate to begin with).

Targeting the Judiciary and Those Supporting Accountability: The Trump administration has also continued its use of targeted sanctions to attack and threaten judges and others involved in pursuing accountability. Under the International Criminal Court sanctions program/E.O. 14203 created in February 2025, the administration sanctioned four more ICC judges and two deputy prosecutors in [August](#) and [December](#) for their roles in ICC investigations of the situations in Palestine and Afghanistan. These actions brought the total number of ICC judges and court officials sanctioned by the administration to eleven by the end of this reporting period.

In recent months, the administration also escalated its attacks against those engaging with the court's investigation of Israeli conduct in Palestine, including unprecedented sanctions against [Francesca Albanese](#), the UN Special Rapporteur on the situation of human rights in the Palestinian Territories occupied since 1967 in July, and sanctions against [three Palestinian human rights NGOs](#).

Beyond the ICC sanctions program, the administration used sanctions and intimidation against judges in inappropriate ways. These include the [sanctions](#) and [visa ban](#) against Brazilian justice de Moraes, his wife, and a holding company, discussed above. State Department officials have also [reportedly considered](#) imposing sanctions against French judges and prosecutors in response to the conviction of far-right French politician Marine Le Pen for embezzlement. In a meeting with a French magistrate who leads the country's human rights commission in May, two State Department officials reportedly claimed Le Pen was the victim of a "political conviction" and [asked](#) if the magistrate could intervene over the resulting election ban against Le Pen.

Focus on Forced Labor in Southeast Asian Cyber Scam Centers: During the reporting period, the Trump administration continued using sanctions to target forced labor and other abuses occurring inside cyber scam centers located in Myanmar and Cambodia. In September, the U.S. government imposed Global Magnitsky sanctions on [She Zhijiang](#) and designated several other persons under a different program in connection with a scam center known as the Yatai New City Compound. In October, [Chen Zhi and the Prince Group](#) were designated as a transnational criminal organization and were sanctioned for the operation of violent and repressive cyber scam compounds in Cambodia. The U.S. government's most recent action against cyber scam centers came in November, targeting the [Democratic Karen Benevolent Army](#) and its associated network.

New Human Rights and Anticorruption Sanctions Designations

Global Magnitsky Sanctions Program (E.O. 13818)

During the second half of the year, just six persons were designated under the Global Magnitsky program, three of whom were delisted a few months later. Additionally, the former President of Paraguay and related entities were delisted after they were sanctioned for corruption in 2023.

- **Brazil:** In July, [Brazilian Supreme Federal Court justice Alexandre de Moraes](#) was sanctioned for “authoriz[ing] arbitrary pre-trial detention and suppress[ing] freedom of expression,” following a [visa ban](#) earlier in the month. De Moraes oversaw the prosecution of Jair Bolsonaro for charges related to the January 2023 attack on Brazil’s governing institutions and had temporarily blocked X (formerly Twitter) in Brazil in 2024. Human Rights First and [others raised](#) concerns about the use of Global Magnitsky sanctions in this case, which was widely seen as an effort to secure impunity for political allies of the Trump administration.

In a follow-up action in September, [the Lex Institute, a holding company for de Moraes, and his wife, Viviane Barci de Moraes](#), were sanctioned for providing material support to de Moraes. The listing of de Moraes’ wife was [criticized](#) by Senators Shaheen, Warren, and Kaine as counter to the “spirit and purpose of the Global Magnitsky Act.” Later in December, the Treasury Department [removed](#) the sanctions against de Moraes, Barci, and the Lex Institute. In a [statement](#) from a senior U.S. official, continued sanctions were considered to be “inconsistent with U.S. foreign policy interests.”

- **Myanmar:** In September, [She Zhijiang, the creator of a compound of cyber scam centers in Myanmar, and two related holdings groups](#) were sanctioned for engaging in forced labor. Victims were reportedly lured to work at the centers under false pretenses, detained and physically abused, made to work for criminal syndicates as online scammers, and forced into commercial sex work. Additional persons and entities connected to the Myanmar cyber scam center, as well as similar abuses in Cambodia, were sanctioned in this action.

- **Paraguay:** In October, the Trump administration [delisted](#) former Paraguayan President Horacio Manuel Cartes Jara, who had been [sanctioned](#) in 2023 for corruption,¹ along with several entities connected to him. A State Department spokesperson [said](#) the administration determined the sanctions “were no longer required to incentivize changes in behavior and were therefore not in the foreign policy and national security interests of the United States.” Senators Shaheen, Warren, and Kaine [called](#) the move “a step backwards” that politicizes Global Magnitsky sanctions and cited the administration’s failure to provide the statutorily required advanced notice of delistings to Congress.

Section 7031(c) Visa Restrictions

From July through December, the State Department publicly designated 17 foreign officials and their immediate family members under its Section 7031(c) visa restriction program. The number of confidential designations that may have been made under this program during this time is unknown.

- **Cuba:** In July, [Cuban President Miguel Díaz-Canel Bermúdez, Minister of Interior Lázaro Alberto Álvarez Casas, Minister of Revolutionary Armed Forces of Cuba Álvaro López Miera](#), and three unnamed family members were designated for their involvement in gross human rights violations on the fourth anniversary of the July 11 protests.
- **Montenegro:** In September, [former Budva mayor and Member of Parliament, Milo Božović, and the former president of the Supreme Court of Montenegro, Vesna Medenica](#), and five family members were designated for their involvement in separate acts of significant corruption.
- **Haiti:** In September, [former Haitian Senator, Antonio Cheramy, former member of the Haitian Chamber of Deputies, Arnel Belizaire](#), and two family members were designated for interfering with public processes of the Haitian government.

¹ Human Rights First and its partners assessed the early impact of these sanctions in its 2023 report, [Evaluating Targeted Sanctions: A Flexible Framework for Impact Analysis](#).

Section 212(a)(3)(C) Visa Restriction Policies

The State Department announced the following new visa restriction policies under Section 212(a)(3)(C) of the Immigration and Nationality Act related to human rights abuses or undermining democracy.

- **Central America:** In September, the State Department announced a new visa restriction [policy](#) for Central American nationals “intentionally acting on behalf of the Chinese Communist Party” who are involved in “activities that undermine the rule of law in Central America.” An unknown number of individuals were designated for their role in such activities.
- **Religious Freedom:** In December, the State Department announced a new visa restriction [policy](#) for foreign nationals involved in “violations of religious freedom.” This policy was announced in response to alleged “mass killings and violence against Christians by radical Islamic terrorists, Fulani ethnic militias, and other violent actors in Nigeria and beyond.” The Department did not announce any designations under this policy.

The State Department announced five follow-up actions under previously announced Section 212(a)(3)(C) policies related to human rights abuses and undermining democracy.²

- **Unjust Detention:** In July, the State Department imposed visa bans against “[numerous Cuban judicial and prison officials](#)” for their involvement in the “unjust detention and torture” of participants in Cuba’s July 2021 protests.
- **Censorship:** In July, the State Department imposed visa bans against “[Brazilian Supreme Federal Court Justice Alexandre de Moraes](#),” as well as his colleagues on the court and immediate family members, for his role in the prosecution of former Brazilian President Jair Bolsonaro. The Department specifically named Justice de Moraes in its announcement of the action, which is unlawful under the INA. In December, the State Department imposed visa bans against [five additional individuals](#) under the same policy for their alleged “efforts to coerce American platforms to censor, demonetize, and suppress American viewpoints they oppose.” The Department’s announcement did not name the targets of this action, but a Department official subsequently [revealed](#) their identities on social media, again violating the INA.

² This new policy resembles the narrower visa ineligibility provision in [Section 212\(a\)\(2\)\(C\) of the Immigration and Nationality Act](#), which bars individuals who were responsible for or directly carried out particularly severe violations of religious freedom in their current or former roles as a foreign government official.

- **Cuba:** In August, the State Department announced two actions under a July 2019 policy related to Cuba's forced labor of physicians and other medical workers. In the first action, the Department imposed visa bans against ["African, Cuban, and Grenadian government officials"](#) for their involvement "renting" exploited medical professionals from Cuba. In the second action, the Department imposed visa bans against [Brazilian government officials and former Pan American Health Organization officials](#) for their involvement in a similar scheme. The Department's announcement unlawfully included the names of two targeted officials within Brazil's Ministry of Health.
- **Honduras:** In December, the State Department imposed a visa ban against [Marlon Ochoa](#) and another unnamed individual under a 2021 policy related to undermining democracy in Guatemala, Honduras, and El Salvador. Again, the Department's release of Ochoa's identity is unlawful under the INA.

For all other State Department announcements made under the Section 212(a)(3)(C) visa restriction authority, please see Human Rights First's resources on How Sanctions Have Been Implemented (Trackers) [here](#).

Human Rights and Anticorruption Sanctions under Country-Specific Programs

Aside from the Global Magnitsky sanctions detailed above, the Treasury and State Departments also imposed targeted sanctions under six country-specific and thematic sanctions programs against more than 130 individuals and entities for their engagement in human rights abuses and/or corruption. This list does not include designations made on grounds other than involvement in human rights abuses or corruption.

- **Democratic Republic of the Congo (E.O. 13413, as amended by E.O. 13671):** In August, [the Coalition des Patriotes Résistants Congolais-Force de Frappe \(PARECO-FF\)](#), an armed group in the eastern DRC, was sanctioned in part for imposing forced labor and executing civilians in areas under its control.
- **Malicious Cyber-Enabled Activities (E.O. 13694, as amended):** In September, [10 people and entities](#) were sanctioned for their role in operating online scam centers with forced labor in Cambodia. This action was announced at the same time as the Myanmar Global Magnitsky designations mentioned above, and one of the companies designated is chaired by Try Pheap, a Cambodian tycoon previously designated under the Global Magnitsky program. In November, [the Democratic Karen Benevolent Army \(DKBA\), senior leader Sai Kyaw Hla, and several other leaders and related companies](#) were also designated for their roles in operating cyber scam centers in Myanmar that harm U.S. citizens and rely on forced labor.

- **Sudan (E.O. 14098):** There were two actions taken under this authority. In September, the [Al-Baraa Bin Malik Brigade \(BBMB\)](#), a Sudan-based Islamist militia, was sanctioned for contributing 20,000 fighters to the Rapid Support Forces who have been implicated in arbitrary arrests, torture, and summary executions. In December, [four Colombian and Panamanian companies and four company officials](#) were designated for their role in recruiting and deploying Colombians to fight alongside the Rapid Support Forces in Sudan.
- **Counterterrorism (E.O. 13224, as amended by E.O. 13886):** There were two actions taken under this authority in October. [Ali Meften Khafeef Al Baidani and Aqeel Meften Khafeef Al Baidani](#), brothers who own an Iraqi bank associated with the Islamic Revolutionary Guard Corps–Qods Force, were sanctioned in part for assisting in laundering proceeds of corruption for political parties and for Iran, and abusing Aqeel Meften’s position on Iraq’s National Olympic Committee to engage in corruption. The leader of the Bel Air gang in Haiti, [Kempes Sanon](#), was designated for indiscriminate killings of civilians and kidnappings.
- **Transnational Criminal Organizations (E.O. 13581):** There were two actions taken under this authority targeting human rights abusers and corrupt actors. In a joint action with the United Kingdom in October, nearly 100 people and entities connected to the [Prince Group transnational criminal organization](#) were sanctioned for their role in sextortion, corruption, human trafficking, torture, and the extortion of enslaved workers in connection with cyber scam compounds in Cambodia. In December, the Mexican cartel, [Cartel de Santa Rosa de Lima, and its leader, Jose Antonio Yopez Ortiz](#), were sanctioned in part for their role in increasing violence and homicides in Guanajuato and kidnapping, among other actions.

Legal Update

In September, the U.S. District Court for the Eastern District of New York [rejected](#) a discovery request made by an individual sanctioned by the U.S. government for violence in the Israeli-occupied West Bank to access information about Democracy for the Arab World Now’s (DAWN) advocacy for sanctions against him. The court’s decision marks a win for civil society groups engaged in sanctions advocacy, particularly for those that publicize their sanctions recommendations, and reaffirms various constitutional and statutory protections. The decision reflected arguments advanced by Human Rights First, the American Civil Liberties Union, and New York Civil Liberties Union in an [amicus brief](#) filed in the spring.

In December, the Treasury Department responded to a [request](#) by the Knight First Amendment Institute on behalf of the U.S. nonprofit Middle Eastern Studies Association (MESA) seeking assurances that inviting Francesca Albanese, the U.N. Special Rapporteur on the situation of human rights in the Palestinian Territory occupied since 1967 who is under U.S. sanctions, to speak at an online event would not violate U.S. sanctions law. The U.S. government confirmed U.S. sanctions do not bar MESA from inviting Albanese to speak, citing the International Emergency Economic Powers Act's constraints against regulating or prohibiting communications that do not involve a transfer of anything of value.³

New Resources and Media from Human Rights First

- [U.S. Global Magnitsky and Related Sanctions: Mid-Year Update January 1, 2025 – June 30, 2025](#): Human Rights First published a report in July tracking designations and trends in key sanctions and visa restriction programs relating to human rights abuses and corruption in the first half of 2025.
- [Sanctions Misuse: The Dubious Lifting of U.S. Targeted Sanctions](#): Human Rights First convened a panel discussion in August on the Trump administration's recent actions lifting sanctions and other measures, in cases in the Dominican Republic, Hungary, Myanmar, Russia, and the West Bank.
- [Neither Shaming nor Naming: New Data on the Confidential Visa Bans under Section 7031\(c\)](#): In a follow-up to its 2023 [report](#), Human Rights First in September analyzed new data from the State Department showing how the Section 7031(c) visa bans have been used confidentially in recent years.
- [Human Rights and Anti-Corruption Sanctions Mid-Year Update](#): Human Rights First contributed to a joint report with REDRESS, Open Society Foundations, Raoul Wallenberg Centre for Human Rights, and the Australian Centre for International Justice that highlights major updates in Magnitsky-style sanctions across the United States, UK, EU, Canada, and Australia in the first half of 2025.
- [Section 7031\(c\) Visa Sanctions Explainer](#): In September, Human Rights First updated its explainer on the details and logistics of the Section 7031(c) visa sanctions program in light of the US government's use of the program in recent years.

³ See 50 U.S.C. § 1702(b)(1)(3).

- **[Human Rights First Seeks Sanctions for Torture in Bahrain Prisons:](#)** In December, Human Rights First submitted a dossier to the U.S. government recommending targeted sanctions against Sheikh Rashid bin Abdullah al Khalifa, Bahrain’s interior minister, based on his role in torture and cruel, inhuman, or degrading treatment in prisons he oversees.
- **[Global Corruption, Local Hypocrisy:](#)** In a *Just Security* article, Human Rights First’s Adam Keith and co-author Schuyler Miller discussed the upcoming State Department reports required by the Combatting Global Corruption Act and the challenges with U.S. anticorruption efforts globally at a time of U.S. backsliding at home.

Access all of Human Rights First’s U.S. targeted human rights and anticorruption sanctions and visa restrictions resources [here](#), and access past publications and events [here](#).

Human Rights First works with partners to coordinate a coalition of more than 340 civil society organizations around the world that advocate for the effective use of targeted human rights and anticorruption sanctions as a tool to promote accountability. The coalition provides training, resources, and assistance to civil society groups to help them prepare well-documented recommendations to the United States, Canada, UK, EU, and Australia identifying perpetrators eligible for human rights or corruption sanctions. Since 2017, the coalition has provided more than 200 sanctions recommendations to these jurisdictions, in addition to other forms of engagement and advocacy on sanctions targets.

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

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

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