

Index

This index is alphabetized in Word-by-Word order. All references to sanctions are to sanctions *against* Russia unless otherwise stated. “Invasion” refers to the full-scale invasion of Ukraine by Vladimir Putin begun on February 24, 2022.

- Abramov, Alexander, 90
- Abramovich, Roman, 89, 93, 96
- access restrictions, 5, 42
- Adams, Andrew, 108–9
- Afghanistan, 9, 80–81
- aircraft, 106
- airspace closure, 25
- Alekperov, Vagit, 90
- Alfa Bank (Russian), 31
- Alfa Group, 96
- Algeria, 59
- aluminum, 67–68
- annexation of Ukrainian territories, 16, 19–20, 99–100
- Antanov Airport, 22
- Anti-Foreign Sanctions Law (China, 2021), 46
- Armenia, 104
- arms shipments to Russia, 75–76, 77
- Assad, Bashar al-, 88
- asset freezes
 - in Afghanistan, 80
 - Freeze and Seize Task Force (EU), 102
 - fully blocked entities and, 12, 20–21, 31
 - in Iran, 7
 - on Russia’s foreign reserves, 26, 32, 101–4
 - Russian Elites, Proxies, and Oligarchs (REPO) Task Force and, 102
 - unfreezing funds, 86–87
 - United States and United Kingdom blocking sanctions and, 20–21
- assets, seizing and forfeiting, 107–10
- Australia, 44
- Australia Group, 6, 74
- autonomous sanctions. *See* unilateral sanctions
- Azerbaijan, 63
- bad actors
 - Russia and Magnitsky death, 10–11
 - Russian actions globally as, 3
 - Russian hacking activities, 11
 - sanctions use against, 4, 23–24
- Bahamas, 31
- Bank for Development and Reconstruction (Belarus), 30
- bans on Russian-origin goods and individuals, 67, 119, 121, *See also* trade restrictions energy-related, 66
- by European Union, 67
- on imported products, 4–5, 66–68, 100, 120
- on investments in Russia, 17, 35–36
- on oil importation, 56
- Russia’s response to, 68
- on travel, 6, 17, 19, 91, 96
- WTO provisions and, 71, 72
- Barcelona Traction, Light & Power Co.* (1970), 42
- Belarus
 - Russia/Belarus MEU FDP Rule, 74–75
 - SWIFT disconnection and, 30
- Belgium v. Spain* (1970), 42
- beneficial ownership, 93, 95, 104
- Biden, Joe
 - alternative energy sources and, 65
 - Russia’s MFN status revocation and, 69
 - US gas prices and, 58

- BIS (Bureau of Industry and Security; US), 17
- Blinken, Antony, 79, 111
- blocking sanctions, 11
- European Union and, 12, 31
 - fully blocked entities and, 12, 20–21, 31
 - United Kingdom and, 20–21, 31
 - United States and, 20–21, 31, 100
- Bolsonaro, Jair, 26
- Borrell, Josep, 23, 45, 79
- British Petroleum (BP), 26
- Brunk, Ingrid, 108
- Bureau of Industry and Security, 65
- aircraft sanctions, 106
 - blocking sanctions on Russian military suppliers, 100
 - jurisdiction of, 5
 - loopholes in sanctions enforcement, 76
 - Russia/Belarus FDP rule, 74–75
 - sanctions evasion red flags, 104–5
- CAATSA (Countering America's Adversaries through Sanctions Act, 2017), 11, 13, 48, 88–89
- Canada, 10, 109
- CCL (Commerce Control List), 74, 75
- Central Bank of Russia, 31, 32
- Central Intelligence Agency (CIA), 15
- chemical weapons, 12
- China
- Anti-Foreign Sanctions Law, 46
 - Cross-Border Interbank Payment System, 33
 - dual-use products for Russia, 77
 - energy agreements with Russia, 58, 59
 - financial ties with Russia, 33, 39
 - sanctions against, 50, 116–17
 - UnionPay, 34
- chokepoint effects, 28, 29, 33
- CIA (Central Intelligence Agency), 15
- CIPS (Cross-Border Interbank Payment System), 33
- CISADA (Comprehensive Iran Sanctions Accountability and Divestment Act), 45
- Clearing House Interbank Payments System (CHIPS), 30–31
- Cleverly, James, 79
- climate change, 115
- COCOM (Coordinating Committee for Multilateral Export Controls), 73
- Commerce Control List (US), 74, 75
- Commonwealth Nations, 5
- Comprehensive Iran Sanctions Accountability and Divestment Act (2010), 45
- comprehensive sanctions
- against Afghanistan, 9
 - against Crimea, 3–4, 10, 12–13, 17, 43, 116
 - against Cuba, 8
 - by European Union, 7, 100
 - exceptions to, 9
 - against Haiti, 9
 - against Iran, 7–8
 - against Iraq, 9
 - against North Korea, 8–9
 - overview, 6–9
 - against Syria, 8, 9
 - by United States, 6–7, 8
- conscription (Russia), 22, 33
- Coordinating Committee for Multilateral Export Controls, 73
- correspondent account sanctions
- chokepoint effects and, 33
 - energy-related transactions and, 22
 - explained, 30
 - Sberbank and, 21
 - transition to blocking sanctions and, 26, 30–31
 - by US, 21
- correspondent banking, 21, 33, 104
- Council of the European Union, 46, 85–86
- Countering America's Adversaries through Sanctions Act (2017), 11, 13, 48, 88–89
- countermeasures, international law of, 107–8
- Credit Bank of Moscow, 30
- credit card companies
- termination of services in Russia, 34
- Crimea
- annexation of, 10, 13
 - financing separatists in, 92
 - referendum on status of, 99
 - sanctions against, 3–4, 10, 12–13, 17, 43, 116
- Cross-Border Interbank Payment System, 33
- cryptocurrency, 38, 100
- Cuba, 8, 45–46
- Cuban Liberty and Democratic Solidary (LIBERTAD) Act (2019), 45–46
- currency volatility, 37–38
- customary international law
- doctrine of, 41
- cyberattacks, 11
- cybersecurity, 75
- debt and equity restrictions, 11, 31
- de-dollarization, 28, 33
- Defense Production Act (US; 2022), 65, 66
- Deripaska, Oleg, 67, 90, 93, 96
- de-risking, 81–82
- displaced persons, 25
- Donbas invasion-related sanctions
- European Union and, 17, 19
 - United Kingdom and, 18
 - United States and, 17, 18

- Donbas region
background, 14–15
invasion, 19–20, 99–100
self-rule for, 15
- Donetsk and Luhansk regions, 14–15, 73–74, 99
- dual-use products
from China to Russia, 77
export controls on, 6, 66, 73, 74
- economic sanctions
efficacy of, 26
frequent use of, 4, 6, 18
human rights violations and, 82
humanitarian crises and, 9, 81
North Korea and, 81
symbolism of, 115
US history of, 5
- economic warfare, 1
- effects doctrine, 41, 42
- election interference by Russia, 11
- energy alternatives
Azerbaijan as source of, 63
climate change and, 63–65
Defense Production Act (US; 2022) and, 65
development of, 64–65
Green Deal (EU), 63–64
Inflation Reduction Act (US) and, 65
Paris Agreement and, 64
Report of the Intergovernmental Panel on
Climate Change (UN), 63
- energy companies, 26, 56, 58
- energy crisis, global (2022), 54–55, 57–59
- energy global trading patterns, 58–59
- energy price cap, 50, 60, 104, 113
- energy sanctions on Russia
effectiveness of, 61, 65
overview of, 57–64
rising revenues and, 61
Russia's response to, 61–63
transactions subject to, 22, 26, 66, 104
Ustenko on, 61
- energy shortages, 59, 60, 62
- Entity List, 50, 74–76, 100
- Estevez, Alan, 66
- European Council, 20
- European Union (EU)
assets seizures and forfeit measures by, 109
blocking sanctions and, 12, 31
comprehensive sanctions by, 7, 100, 117
Council of the, 46, 85–86
food security and sanctions package, 86–87
invasion-related sanctions by, 67
Iran sanctions by, 7
legal framework for sanctions by, 5–6
post-invasion sanctions, 120
restrictive measures and, 4
sanctions enforcement and, 102
sanctions evasion measures by, 50
secondary sanctions by, 7, 51–52
US extraterritorial sanctions opposition by, 45, 46
- Euro-Siberian gas pipeline, 45
- export control groups, 5, 73–74. *See also* Wassenaar
Arrangement
- Export Control Reform Act (2018), 5
- export controls (general), 74
- export controls against Russia
on arms shipments, 75–76
defined, 66
on dual-use products, 4, 6, 66, 73, 74
effects of, 76
on energy-related transactions, 26
export bans to Russia, 66, 75–76, 100, 119
extraterritorial application of, 42–44
on high-tech items, 4, 5, 73
loopholes in, 76
on luxury goods, 76
multilateral, 73–74
overview, 5, 74–76
parallel imports and, 76–77, 113
products destined for Russia, 75–76
purposes of, 66, 77
quantum computing and, 75
Russia's response to, 68
tightening of, 23
- expropriations, 109–10
- extraterritorial application of sanctions, 44
Barcelona Traction, Light & Power Co. 42
access restrictions and, 42
by Australia, 44
against Cuba, 45–46
customary international law and, 41
effects doctrine and, 41, 42
Euro-Siberian gas pipeline and, 45
against Iran, 45
mechanisms of, 42–44
nationality principle and, 41, 42
negative consequences of, 47–48
passive personality and, 41
prescriptive jurisdiction and, 41
primary sanctions and, 40, 42
protective principle and, 41, 42
against Russia, 48–51
secondary sanctions and, 40, 42, 45
statutes (non-US), 46–47
statutes (US), 44
territorial principle and, 41–42
unintended consequences of, 50–51
by United Kingdom, 44

- extraterritorial application of sanctions (cont.)
by United States, 42–44
by United States, opposition to, 44, 46
- extraterritoriality, 40–41, 42
- Exxon Mobil, 58, 63
- FATF (Financial Action Task Force), 38–39, 91, 104
- FDI (foreign direct investment) inflows, 36, 113
- FDP (US Foreign Direct Product) Rule, 44, 74–75
- Fedun, Leonid, 90
- Fedwire, 30
- Financial Action Task Force, 38–39, 91, 104
- Financial Intelligence Units (FIUs), 102–3
- financial sanctions against Russia, 27, 28, 36–37, 102–3. *See also* SWIFT messaging system, *See also* sovereign debt, *See also* global financial system
- Financial Stability Board, 37–38
- financial transparency, 93–95
- FinCEN, 93, 94–95
- Finland, 20
- fish, 68
- FIUs (Financial Intelligence Units), 102–3
- food export restrictions, 82
- food security
effects of sanctions on, 79–80, 85–87
European Union sanctions package for, 86–87
global disruption in 2022, 79–80, 82–85
humanitarian exceptions to sanctions for, 80, 82, 86
Office of Foreign Assets Control (US) and, 86
- foreign direct investment inflows, 36, 113
- Foreign Direct Product Rule (US), 44, 74–75
- foreign reserves freeze, 26, 32, 101–4
- Fridman, Mikhail, 96
- full-scale invasion of Ukraine. *See* invasion of Ukraine
- G7 nations, 50, 69, 120
- gasoline companies, 26, 56, 58
- Gazprom, 58, 61–62
- General Agreement on Tariffs and Trade (GATT), 69, 71, 72
- general invasion of Ukraine, 102
- Germany, 58–59, 103, 106–7
- global financial system
Russian access to, 21, 23, 24, 25, 26, 27–28
Russian isolation from, 24, 26, 27, 28, 78
sanctions (2022) impact on, 28
- gold, 67
- Google, 26
- government officials (Russian), sanctioning of, 88
- grain. *See* wheat
- Guryev, Andrey, 90
- Guterres, António, 24
- Harmonized Tariff Schedule of the United States, 70–71
- Helms-Burton Act, 45–46
- Huawei, 74–75
- human rights
sanctions, 10, 11
violations, 3, 82
- Human Rights Watch, 80–81
- humanitarian aid to Ukrainians, 2
- humanitarian crises, sanction-related, 9, 81
- Hungary, 96
- IEEPA (International Emergency Economic Powers Act), 5, 108
- IFCA (Iran Freedom and Counter-Proliferation Act, 2013), 45
- import restrictions, 102
comprehensiveness of, 67–68
defined, 66
goals of, 77
imposed on Russia, 67
retaliatory sanctions by Russia, 68
Russia's objections to, 72
by United Kingdom, 67
- India, 49
- inflation, 37, 57, 80, 113
- Inflation Reduction Act (US), 65
- Instrument in Support of Trade Exchanges (INSTEX), 46
- international airspace closure, 25
- International Court of Justice, 42
- International Emergency Economic Powers Act, 5, 108
- international law of countermeasures, 107–8
- invasion of Ukraine
Donbas region invasion, 16, 19–20, 99–100
global food supplies and, 85–87
progress of, 24, 25, 99, 100
- investment law, international, 109–10
- investments in Russia
bans on, 17, 35–36
foreign direct investment inflows, 36, 113
voluntary suspension of private sector, 36
- Iran
arms shipments from, 77
Comprehensive Iran Sanctions Accountability and Divestment Act, 45
correspondent/payable-through account sanctions and, 30
inflation in, 80
Instrument in Support of Trade Exchanges and, 46
Iran Freedom and Counter-Proliferation Act (2013), 45

- Iran Sanctions Act (1996), 45
Iran Threat Reduction and Syria Human Rights Act, 45
National Iranian Oil Company, 58
sanctions against, 6–8, 9
SEPAM connection to Russian SPFS, 30
SWIFT disconnection and, 29
- Iraq, 9, 80
Italy, 59
- Japan
currency volatility in, 37
invasion-related sanctions against Russia, 31
Sakhalin-1 ownership by, 63
SWIFT disconnection and, 25
- Jentleson, Bruce W., 98
Joint Comprehensive Plan of Action (JCPOA; 2013), 7–8, 45
Jones Act (1920), 58
- Kabaeva, Alina, 89–90
Kantor, Vyacheslav, 90
Kerch Strait Bridge explosion, 100
Kerry, John, 53
Kim Jong Un, 88
Kovaleva, Polina, 89
Kyiv, 23
- legal frameworks for sanctions, 3
for European Union, 5–6
global, 4–6
for United Kingdom/Commonwealth Nations, 5
for United Nations, 6
- Leyen, Ursula von der, 25, 33
Libya, 6–7
Lisin, Vladimir, 90
Luhansk and Donetsk regions, 4, 6, 14–15, 73–74, 99
Lukashenko, Alyaksandr, 88
luxury goods export control, 76
- Magnitsky Act, 11
Magnitsky Sanctions (Global), 12
Magnitsky, Sergei, 10–11
Main
Sub1, 1
Malaysian Airlines Flight 17, 10
Malofeyev, Konstantin, 92
market/non-market economy designations, 71
McGuinness, Mairead, 102
metals, 67–68
MFN (most favored nation status), 69–71
microchip shortage, 34–35
Mikhelson, Leonid, 90
military assistance to Ukraine, 2, 118
MIR payment system, 34–35, 49
Missile Technology Control Regime, 73–74
money laundering, 94–95, 102–3, 104
most favored nation (MFN) status, 69–71
MTCR (Missile Technology Control Regime), 73–74
multilateral sanctions, 4, 6, 73–74
- National Crime Agency (UK), 105
National Payment Card System Joint Stock Company, 35, 49
nationality principle, 41, 42
Navalny, Alexei, 12, 90
New Zealand, 50
non-UN sanctions. *See* unilateral sanctions
Nord Stream 2 AG, 19
Nord Stream pipelines, 62
North Korea, 77, 81
Norway, 25, 58
NSPK (National Payment Card System Joint Stock Company), 35, 49
nuclear technology, 5
- O'Brien, James, 102
Office of Financial Sanctions Implementation (UK), 5, 12, 44, 105
Office of Foreign Assets Control (OFAC; US)
about, 5
Donbas annexation (2022) and, 100
food security and, 86
MIR payment system and, 35
sanctions evasion and, 107
Office of Sanctions Coordination (US), 102
OFSI (Office of Financial Sanctions Implementation; UK), 5, 12, 44, 105
oligarchs, 49. *See also* specific individuals
deaths of, 97
impact of sanctions on, 96–97
Russian Elites, Proxies, and Oligarchs (REPO) Task Force and, 102
sanctioning of, 88–89, 90
Organization of Petroleum Exporting Countries (OPEC), 59
overcompliance, 47–48, 81–82, 112
- Pandora Papers, 94
parallel imports, 76–77, 113
passive personality, 41
payable-through account sanctions, 21, 30–31
PayPal, 34
Pevchikh, Maria, 89
Potanin, Vladimir, 90
prescriptive jurisdiction doctrine, 41

- primary sanctions
 - Entity List and, 50
 - extraterritorial application of, 40, 42
 - US imposed post-invasion, 51–52
- private entities, 24, 26, 36
- Prokhorov, Mikhail, 91
- protective principle, 41, 42
- Putin, Vladimir
 - justifications for invasion and, 13–14
 - sanctions evasion by, 93–94
 - special operation in Donbas, 16, 19–20, 99–100
- Qaddafi, Muammar al-, 88
- quantum computing export controls, 75
- Raimondo, Gina, 76
- ransomware, 11
- RDIF (Russian Direct Investment Fund)
 - sanctions against, 31
- refugees, 25
- regime change, sanctions to foment, 9–10
- remittances, 32–33
- restrictive measures, 2, 4, 24
 - European Union, 4
 - February 26, 24
 - on Russian financial institutions, 21
 - sanctions comparison, 4
- Rosenberg, Elizabeth, 112
- ruble (rouble), digital, 34–35
- RUSAL (Russian), 67–68
- Russia Sanctions Act (New Zealand; 2022), 50
- Russia/Belarus MEU FDP Rule, 75
- Russian banking system. *See* Russian financial institutions
- Russian Direct Investment Fund
 - sanctions against, 31
- Russian financial institutions, 100
 - account sanctions and, 30
 - Alfa Bank, 31
 - Central Bank of Russia, 31, 32
 - Credit Bank of Moscow, 30
 - direct sanctioning of, 30
 - Gazprombank, 21
 - Novikombank, 21
 - Otkritie, 21
 - Russian Agricultural Bank, 21, 30
 - Sberbank, 21, 30, 31
 - SDN-listed private commercial banks, 31–32
 - SDN-listed state-owned banks, 18, 20–21
 - SEPAM connection to Russian SPFS, 30
 - Sovcombank, 21, 29–30
 - sovereign debt, 18, 19, 36
 - SWIFT disconnection, 28
- System for Transfer of Financial Messages (SPFS), 29
- Transkapitalbank, 31–32
- United States and United Kingdom sanctions
 - against, 67
 - VTB, 20–21
- Russian military-industrial base
 - material support to, 49–50, 100
 - UK sanctions on, 120
- Russian products, 121
 - ban on, 4–5, 66–68, 100, 120
 - diamonds, 67
 - exceptions to bans, 67
 - finished products, 68
 - fish, 68
 - gold, 67
 - metals, 67–68
 - overview of, 66–67
- Russia's responses to sanctions, 11, 12, 61–63, 68, 97
- Rybolovlev, Dmitry, 90
- Sakhalin-1 pipeline, 63
- Sakhalin-2 oil and gas field, 62–63
- sanctions, 4
- sanctions (general)
 - defined, 4
 - economic effects of, 26, 28, 36–37, 112–14, 116
 - effectiveness of, 61, 65, 111–12, 116, 117
 - global legal frameworks for, 3–9
 - global participants in, 26
 - non-economic effects of, 115
 - non-participants in, 26, 40
 - objectives of, 10, 26
 - opposition to, 117
 - post-invasion extent of, 117, 119–20
 - sanctions use, global frequency of, 1
 - trade restrictions comparison, 4
 - types of. *See* secondary sanctions, *See* primary sanctions, *See* blocking sanctions, *See* sectoral sanctions, *See* comprehensive sanctions, *See* Specially Designated Nationals and Blocked Persons (SDN) List, *See* targeted sanctions, *See* trade measures, *See* multilateral sanctions
- sanctions against individuals, 91
 - impact on residency and citizenship status, 91
 - on oligarchs, 88–89, 90, 96–98
 - on Russian government officials, 88
 - on Russian propagandists, 90–91
- sanctions compliance, 34
- sanctions enforcement
 - barriers to, 95–96
 - European Union and, 102
 - Freeze and Seize Task Force (EU), 102
 - impact on oligarchs, 96–97

- legal appeals and, 96
- McGuinness and, 102
- measures taken, 95, 101–3, 105–7
- Office of Sanctions Coordination (US), 102
- Russian Elites, Proxies, and Oligarchs (REPO) Task Force and, 102
- sanctions evasion
 - Abramovich, Roman and, 93, 96
 - aircraft and, 106
 - cryptocurrencies and, 38
 - Deripaska, Oleg and, 90
 - evasion techniques, 103–5
 - extraterritorial measures, 50
 - FinCEN and, 93, 94–95
 - Kerimov, Suleiman and, 92–93
 - Malofeyev, Konstantin and, 92
 - money laundering and, 94–95, 102, 104
 - oil shipments and, 60–61
 - parallel imports and, 76–77, 113
 - Putin, Vladimir and, 93–94
 - Special Economic Measures (Russia) Regulations (Canada) and, 93
 - Zimenkov, Igor and, 107
- sanctions, effects of
 - human cost of, 9–10, 82
 - human rights and, 3, 10, 11, 82
 - political impact of, 115–16
 - symbolic value of, 115
 - third-party effects, 112
- SARs (Suspicious Activity Reports), 102–3
- Sberbank, 30, 31
- Scholz, Olaf, 25
- secondary sanctions
 - by European Union, 7, 51–52
 - extraterritorial application of, 40, 42, 45
 - G7 oil price cap as, 50
 - Iran-Libya Sanctions Act (1996) and, 7
 - MIR payment system and, 35
 - Nord Stream 2 pipeline and, 48–49
 - as penalties, 42
 - on Russian military-industrial base, 49–50, 120
 - Russian nationals/citizens and, 48
 - US imposed post-invasion, 49–52
- sectoral sanctions, 11, 13, 22, 119–20
- senders (key actors in sanctions), defined, 4
- Serniya Engineering (Russian), 106
- Sertal (Russian), 106
- significant transactions, defined, 48
- Singapore, 31
- Skripal, Sergei, 12
- smart sanctions, 112
- South Korea, 31
- Sovcombank, 29
- sovereign debt, 18, 19, 36
- Special Economic Measures (Russia) Regulations (Canada; 2022), 93
- Specially Designated Nationals and Blocked Persons (SDN) List
 - Bitrivers and, 38
 - Deripaska, Oleg on, 67, 93, 96
 - explained, 12
 - Malofeyev, Konstantin on, 92
 - PdVSA (Venezuelan) on, 54
 - pre-invasion sanctions on Russia and, 12–13
 - private commercial banks (Russian) on, 31–32
 - RUSAL (Russian) and, 67–68
 - Serniya Engineering (Russian) on, 106
 - Sinno Electronics and Armenian Taco LLC (Chinese) on, 50
 - state-owned banks (Russian) on, 18, 20–21
- SPFS (System for Transfer of Financial Messages), 29
- sports ban, 115
- statutes. *See also* TWEA, *See also* IEEPA
 - applied extraterritorially, 44, 46–47
 - United States, 44, 108
- Stephan, Paul, 107
- Støre, Jonas Gahr, 25
- Suspicious Activity Reports, 102–3
- SWIFT messaging system
 - as foreign policy tool, 28–30
 - global dominance of, 28
 - Japan's disconnection of, 25
- Switzerland, 109
- Syria, 8, 9, 45, 81
- targeted sanctions (post-invasion)
 - comprehensiveness of, 1, 26, 28, 51, 119
 - on energy-related transactions, 26
 - on global financial system, 21, 23, 24, 25, 26, 27–28
 - international extent of, 1, 25, 50–51
 - private businesses blockages of Russian media/products, 24
 - restrictive economic measures, invasion-related, 23, 24
- targeted sanctions (pre-invasion)
 - against China, 116–17
 - against Iran, North Korea, and others, 20, 115
 - limiting economic harm and, 112
 - smart sanctions, 112
- targets (key actors in sanctions), defined, 4
- tariffs, 4–5, 70–71
- Task Force KleptoCapture (US), 89, 106, 108–9
- territorial integrity, 1, 10, 115
- territorial sovereignty
 - extraterritorial sanctions and, 45
 - threats to, 10, 46, 99–100

- terrorism, 115, 119
 third parties, 45, 105, 110
 Tinkov, Oleg, 96
 titanium, 68
 TRA (Iran Threat Reduction and Syria Human Rights Act), 45
 trade restrictions
 defined, 71
 goals of, 4, 77
 loopholes in, 67–68, 76, *See also* sanctions evasion
 national security rights and, 71–72
 sanctions comparison, 4
 trading patterns, shifts in, 58–59, 82–83, 113
 Trading with the Enemy Act, 5, 108
 Transkapitalbank, 31–32
 transparency, financial, 93–95
 travel restrictions, 6, 17, 19, 91, 96
 Tribe, Laurence, 107
 Truss, Liz, 88
 Turkey, 48
 TWEA (Trading with the Enemy Act), 5, 108
- Ukraine
 annexation of Donbas territories, 16, 19–20, 99–100
 declaration of independence, 13
 Donbas region invasion, 19–20, 99–100
 invasion of, 24, 25, 99, 100
 justifications for invasion and, 13–14
 OFAC and, 100
 reconstruction of, 107, 109
 territorial integrity, 1, 10, 115
 territorial sovereignty of, 10, 45, 46, 99–100
 unilateral sanctions
 extraterritorial application of, 41
 on North Korea, 8–9
 synonymous terms for, 4
 on Syria, 8
- UnionPay (China), 34
 United Kingdom (UK)
 extraterritorial application of sanctions, 44
 National Crime Agency, 105
 Office of Financial Sanctions Implementation, 5, 12, 44, 105
 Russian imports ban, 67
 sanctions against Russia, 5, 12, 31, 32, 120
- United Nations
 legal framework for sanctions by, 6
 United Nations Security Council, 7–8, 23–25
 United States (US)
 blocking sanctions by, 31
 comprehensive sanctions by, 6–7, 8
 Defense Production Act, 65
 Department of Energy, 5
 Department of State, 5
 Donbas invasion-related sanctions, 17
 Executive Orders, 48, 67
 export control authority, 5
 Foreign Direct Product Rule, 44
 frequency of sanctions use by, 5, 6
 gas prices, 57–58
 Harmonized Tariff Schedule of, 70–71
 Office of Foreign Assets Control (OFAC), 5, 35, 86, 100, 107
 Office of Sanctions Coordination (US), 102
 opposition to US sanctions (by US citizens), 117
 post-invasion sanctions, 119–20
 pre-invasion sanctions, 11, 12–13
 sanctions against Cuba, 8
 sanctions against Iran, 7–8, 9
 sanctions against Yemen, 9
 sanctions use, history of, 5, 6
 US dollar (USD), 28, 33
 Ustenko, Oleg, 61
- Vekselberg, Viktor, 89
 Venmo, 34
- Wagner Group, 75–76, 119
 Walsh, Caitlin, 79
 Wassenaar Arrangement, 6, 73
 West Texas Intermediate (WTI), 57
 wheat
 embargo, 66–67
 global supply, 82–84
 prices, 82, 83–84
 shifting trade patterns for, 82–83
 World Trade Organization (WTO)
 legal framework of, 69
 national security rights, Article XXI of the General Agreement on Tariffs and Trade, 71–72
 on national security rights, Article XXI of the General Agreement on Tariffs and Trade, 72–73
 origins of, 69
 Russia's objections to import restrictions, 72
 trade disputes resolution and, 69
 WTI (West Texas Intermediate), 57
- Yanukovych, Viktor, 13–14
 Yellen, Janet, 40, 101–4, 108
 Yemen, 9
 Yushchenko, Viktor, 13–14
 Zelensky, Volodymyr, 15, 23, 91