



The (Global) Magnitsky Act(s): Has Combating Corruption and Human Rights Abuses Ever Been at the Forefront of the Sanctions Space?

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Abstract. The various initiatives adopted (also, following the death of Sergei Magnitsky) in the United States and in the European Union to counter corruption and human rights violations through sanctions, were seen by some as a critical advancement in international efforts to combat such kind of abuses through, amongst others, individual designations and other targeted sanctions. But, has this ever been the case? After an overview of the main thematic sanctions programs related to human rights violations and corruption, the paper will attempt to examine the effectiveness of such initiatives. Particular attention will be devoted to enforcement, to better understand whether anti-corruption sanctions were recently 'neglected' due to, amongst others, an increased focus on other trade restrictions against Russia, or they actually were never enforced quite vigorously. The paper will also consider the challenges encountered so far in the implementation of such measures, including circumvention by designated individuals, often facilitated by professional enablers, which contributes to undermine their efficacy. Finally, the paper will conclude with policy recommendations, including enhancing international cooperation, fostering national sanctions enforcement, implementing new strategies for tackling sanctions circumvention and strengthening laws related to asset transparency and beneficial ownership, in order to improve the effectiveness of such sanctions regimes.

Keywords: Magnitsky Act, targeted sanctions, anti-corruption, human rights violations, sanctions enforcement, asset freezing.

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1. INTRODUCTION: FROM SERGEI MAGNITSKY TO GLOBAL SANCTIONS

The death of Russian lawyer Sergei Magnitsky in 2009 triggered an unprecedented wave of legislative activity, leading to the adoption of targeted sanctions regimes in the United States and, later, in the European Union and other nations (Zambrano, 2020, pp. 920-922). These "Magnitsky Acts" promise to hold perpetrators of corruption and human rights violations individually accountable, circumventing traditional barriers of state sovereignty and political inertia (Prewitt, 2024, p. 1; REDRESS, 2023, p. 6). But questions soon arose about whether these measures represented a true paradigm shift or merely added nuance to established foreign policy tools.

Sanctions have long had dual (and sometimes conflicting) aims: achieving geopolitical ends and upholding global values such as human rights. This article traces the evolution, implementation, and practical challenges of Magnitsky-style sanctions and explores if, and to what extent, combatting corruption and human rights abuses has ever really been at the frontline of global sanctions policy.

2. THE EMERGENCE OF THEMATIC SANCTIONS: HUMAN RIGHTS AND CORRUPTION

2.1. The Genesis: The U.S. Magnitsky Act

Passed in 2012, the United States' original Magnitsky Act aimed to punish Russian officials responsible for Magnitsky's death by denying them entry and freezing their U.S. assets. In 2016, the "Global Magnitsky Human Rights Accountability Act" expanded this tool to address grave human rights abuses and corruption globally (Sanctions Watch, 2025; Human Rights First, 2020, p. 1).

The Global Magnitsky Act empowers the U.S. executive to issue targeted sanctions against "foreign persons" responsible for, complicit in, or associated with serious human rights abuse or significant corruption, irrespective of nationality or location (Human Rights First, 2020, p. 1; Moraitou-Politzi, 2025, p. 1).

2.2. European Union and Other Jurisdictions

The EU Global Human Rights Sanctions Regime ("EU Magnitsky Act"), launched in December 2020, marked a significant evolution in the European approach, enabling targeted sanctions against perpetrators worldwide (Artusi, 2025, p. 20; Sanctions Watch, 2025). However, initial limitations excluded grand corruption from the scope, a distinction subject to ongoing debate and advocacy (Gordini, Szczypka & İnalci, 2022, p. 82; Montoya, 2021, p. 15).

Other jurisdictions, including Canada, the UK, and Australia, have enacted similar frameworks (Sanctions Watch, 2025; Human Rights First; REDRESS, 2025), with variations regarding the inclusion of corruption and the specifics of designated conduct.

2.3. Objectives and Instruments

These regimes share a core methodology:

- targeted asset freezes,
- travel bans or visa denials,
- designation of named individuals and entities ("smart sanctions"),
- legal requirements for states or financial institutions to freeze or refuse service to sanctioned targets (Human Rights First, 2020, p. 1; CIFAR, 2025; Sanctions Watch, 2025).

3. HAS COMBATTING CORRUPTION AND HUMAN RIGHTS ABUSES BEEN AT THE FOREFRONT?

3.1. Rhetoric vs. Reality

Although the rhetoric surrounding Magnitsky-style sanctions is strong, actual enforcement and designations in the anti-corruption and human rights space have often lagged behind broader foreign policy and security objectives (Pasculli & Stanford, 2022, p. 24; Moiseienko, 2024, p. 46). Human rights violations and corruption are sometimes cited as justifying designations, but are frequently subordinated to strategic or geopolitical aims (Findley, Nielson & Sharman, 2022, pp. 21-23; Spaggiari, 2024, p. 191).

For example, while the United States and United Kingdom have listed several Russian officials under their Global Magnitsky laws, many more targets have been added under emergency regimes triggered by Russia's invasion of Ukraine (Artusi, 2025, p. 71; Schott, 2023, p. 1).

3.2. By the Numbers

A review of 2023 and 2024 statistics reveals that Magnitsky-style designations remain a small fraction of total global sanctions activity. CIFAR's 2024 and 2025 reports identify fewer than 500 anti-corruption designations globally (CIFAR, 2024, p. 1; 2025, p. 1), compared to tens of thousands related to other geopolitical or trade sanctions (Sanctions Watch, 2025).

3.3. Case Study: EU-Russia and the Ukraine Conflict

In the EU context, the 2020-2024 period was overwhelmingly dominated by Russia-related sanctions, with human rights and anti-corruption designations comprising only a small portion of overall activity (Artusi, 2025, p. 71; Portela, 2021, p. 34). EU debates continue regarding the explicit inclusion of corruption as a sanctionable act, and analysts note limited use of the EU's global sanctions regime in the corruption arena (Sanctions Watch, 2025; Zamfir, 2023, p. 3).

3.4. Drivers of Enforcement and Neglect

The "magnifying glass" frequently moves: periods of intense focus (e.g., U.S. designations for the killing of Jamal Khashoggi or Myanmar's military crackdown) alternate with lengthy lulls, during which anti-corruption and human rights sanctions are used sparingly (Gomes-Abreu, 2021, p. 183; Prewitt, 2024, p. 9). This fits a recurring pattern: when competing foreign policy or security concerns (like trade with Russia, or counterterrorism) dominate, thematic sanctions recede in practical significance (Findley et al., 2022, p. 13; Zambrano, 2020, p. 931).

4. EVALUATING EFFECTIVENESS: IMPLEMENTATION, IMPACT, AND LIMITATIONS

4.1. Enforcement and Implementation: The Gaps

Implementation and enforcement remain persistent weak points. First, national authorities struggle with designation follow-up, especially as financial flows, assets and beneficial ownership are often obfuscated (Cizmaziova, Czuppon & Oldfield, 2024, p. 7; Bogdanova & Allegrezza, 2025, p. 18).

4.1.1. Asset Freezing Challenges

While asset freezes receive headlines, practical freezing often fails due to:

- lack of asset tracing capacity,
- difficulty identifying assets held via offshore/anonymous structures (Oldfield, 2022, pp. 15-16; CIFAR, 2024),
- under-resourced financial intelligence units.

4.1.2. Divergent National Approaches

EU member states display widely varying commitment and capacity. Some, like the Netherlands and Nordics, exhibit robust compliance, while others lag or selectively enforce sanctions, thereby undermining the regime's credibility (Bogdanova & Allegrezza, 2025, p. 18; Cizmaziova et al., 2024, p. 10).

4.1.3. Political Will and Diplomatic Calculations

National authorities frequently hesitate to designate individuals connected to key partnerships or arms-length relationships. Political considerations affect both the scope and intensity of sanctions deployment (Kaczmarek & Newman, 2011, p. 750; Spalding, 2010, p. 398).

4.2 Measuring Impact: Deterrence, Accountability, and Behavioral Change

4.2.1. Target Accountability

There is limited evidence that Magnitsky-style sanctions consistently achieve accountability for corruption and human rights crimes (Moiseienko, Musni & Merwe, 2023, p. 51; Dillard, 2022, p. 3). In many cases, designated persons have entrenched domestic power and minimal connection to sanctioned jurisdictions - limiting concrete impact (Moiseienko, 2024, p. 33; Gomes-Abreu, 2021, p. 176). This focus on individual accountability has led some analysts to view Magnitsky sanctions as a form of quasi-criminal justice, stemming from a general dissatisfaction with the slow and often inaccessible mechanisms of international criminal law (Kerr & Sexton, 2022, p. 25)."

4.2.2. Deterrence and Norm Promotion

Sanctions play a symbolic or stigmatizing role. However, studies suggest that real deterrent effects are muted, especially in autocratic or closed environments, where targets may wear designations as a badge of political loyalty rather than criminal culpability (Hamilton et al., 2024; Keith, 2023, p. 4).

4.2.3. Asset Recovery Links

Magnitsky-style sanctions can support asset recovery by triggering investigations and asset identification. However, the current lack of seamless legal coordination between sanctions and criminal confiscation procedures often stalls progress (Cizmaziova, 2021, p. 2; 2023, p. 3; Rose, 2023, p. 17; REDRESS, 2022, p. 2).

4.3 Unintended Consequences

Sanctions may unintentionally strengthen illicit networks by forcing assets into even more opaque structures (Kamali, Mashayekh & Jandaghi, 2016, p. 278). Collateral damage to civil society or independent business can occur if measures are misapplied (Søreide, Grönig & Wandall, 2016, pp. 541-543; Moiseienko, 2024, p. 17).

5. CIRCUMVENTION, ENABLERS AND IMPLEMENTATION CHALLENGES

5.1 Evasion Techniques

Designated individuals routinely circumvent sanctions by:

- using complex offshore structures and nominees,
- relying on professional intermediaries (lawyers, accountants),
- transferring assets to family or trusted associates,
- exploiting weak links in cross-border enforcement (Bergin, 2024, p. 13; Cizmaziova et al., 2024, p. 13).

Aggressive tactics, including fraudulent contracts and shell companies, make asset freezing technically and legally challenging (Oldfield, 2022, pp. 15-16; CIFAR, 2025).

5.2 The Role of Professional Enablers

Professional enablers (law firms, company formation agents, accountants) facilitate circumvention either knowingly or due to deficient due diligence (Bergin, 2024; CIFAR, 2025). Enforcement gaps persist, particularly where enablers are lightly regulated.

5.3 Information and Transparency Deficits

Asset tracing and enforcement are stymied by limited information on beneficial ownership, frequent use of trusts and opaque vehicles, and insufficient cross-border cooperation (Cizmaziova, 2021; Open Society Foundations, 2022, p. 11).

5.4 Inconsistent National Implementation

Varying degrees of administrative capacity, political will, and legal frameworks result in patchy effectiveness across jurisdictions (Bogdanova & Allegrezza, 2025, p. 18). Non-EU countries may serve as safe havens due to minimal compliance.

6. NEGLECT OR INHERENT LIMITATIONS? THE ENFORCEMENT DEBATE

While some suggest that recent focus on Russia and related trade sanctions has led to neglect of anti-corruption sanctions, the evidence suggests that enforcement was never especially vigorous. Rather, operational and political limitations, including:

- lack of meaningful asset tracing,
- inconsistent application at national level,
- diplomatic and economic trade-offs.

have consistently limited impact, regardless of strategic priorities (Artusi, 2025, p. 86; Cizmaziova et al., 2024). The "momentum" of anti-corruption and human rights sanctions thus appears episodic, and heavily contingent upon broader foreign policy interests.

7. TOWARDS GREATER EFFECTIVENESS: LAW, POLICY AND PRACTICAL REFORMS

7.1 Enhancing International Cooperation

- Cross-border enforcement: closer cooperation between sanctions authorities, financial intelligence units, and law enforcement agencies is essential to trace and freeze assets (Pavlidis, 2021, p. 8; Ryngaert, 2022, p. 6).
- Automatic exchange of beneficial ownership data: should be institutionalized to help dismantle offshore secrecy (Open Society Foundations, 2022, p. 12).

7.2 National Sanctions Enforcement

- Resource allocation: boost funding, staffing, and training for national compliance and asset tracing units (Bogdanova & Allegrezza, 2025, p. 25; Cizmaziova, Czuppon, & Oldfield, 2024, p. 35).
- Centralized reporting: standardize implementation and progress monitoring across jurisdictions (Sanctions Watch, 2025).
- Sanctions harmonization: minimize forum shopping to jurisdictions with weak or uneven enforcement (CIFAR, 2025).

7.3 Tackling Circumvention

- Tougher regulation of enablers: strengthen due diligence and reporting obligations for professionals in law, accounting, and business services (Bergin, 2024).
- Sanctioning facilitators: directly designate enablers who intentionally assist in evasion (UK FCDO; OFSI, 2025).
- Closer scrutiny of asset transfers: automatic review of transfers, property sales, and trust arrangements linked to designees.

7.4 Transparency and Beneficial Ownership

- Public registers: mandate accessible registers of beneficial ownership for companies, trusts, and property holdings (Open Society Foundations, 2022, p. 7).
- Adoption of Model Laws: encourage uptake of robust national legislation, parallel to international best practice (REDRESS, 2022, p. 3).

7.5 Strategic Designations and Policy Coherence

- Clearer targets: focus on high-impact designations with visible links to corruption and egregious abuses (Moraitou-Politzi, 2025, p. 1).
- Civil society involvement: soliciting input and evidence from NGOs, journalists and activists can strengthen case files and enhance legitimacy (Hamilton et al., 2024, p. 363).
- Integration with criminal law: improve connections between sanctions, criminal investigation, and asset confiscation processes to maximize accountability and recovery.

8. CONCLUDING REMARKS

The promise of the (Global) Magnitsky Acts was an international system that could hold corrupt actors and human rights abusers personally accountable when home governments failed to act. In practice, the role of such sanctions has often been more marginal than their advocates claim. While important as a tool of accountability and symbolic justice, Magnitsky-style sanctions have not been consistently at the forefront of the sanctions space: both enforcement and overall impact have lagged due to operational, political, and legal constraints.

Recent geopolitical developments, especially the focus on Russia, have brought renewed attention - but also risk pushing anti-corruption and human rights goals into the background. Addressing structural enforcement shortcomings, enhancing international coordination, and imposing real transparency on beneficial ownership and professional intermediaries will be essential if these ambitious regimes are to fulfil their original promise.

The future effectiveness of these measures depends, not just on broadening their scope or supplementing legal frameworks, but on devoting genuine resources and political capital to their implementation, and creating an ecosystem where sanctions against corruption and human rights abuses are not just reactive or symbolic, but part of an integrated and enforceable system for global accountability.

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