



Leveraging Targeted Sanctions in Defense of Religious Freedom

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Thank you Senator Cardin, Senator Wicker, Congressman McGovern, and distinguished members of the Commission. It is an honor to testify today. I will discuss 1) trends in religious freedom revealed by Freedom House's research and programming, 2) conditions in China, where religious persecution is happening on a mass scale, and 3) recommendations for how the United States and other democracies can strengthen targeted sanctions programs to apply them with greater impact.

Freedom House

Freedom House, which marks its 80th anniversary this year, is a DC-based nonprofit organization working to defend and expand freedom globally through a combination of research, programming, and advocacy.

Trends Revealed by Freedom House Research and Emergency Assistance Programming

Freedom House research has tracked 15 straight years of decline in freedom and democracy around the world, with 2020 seeing the deepest declines of the last 15 years. Nearly 75 percent of the world's population now live in countries that faced a deterioration in rights in 2020.¹ Unfortunately, worsening conditions for religious freedom are a component of this deepening democratic recession, with the global average score for our religious freedom indicator declining by 5.6 percent over the last 15 years.

State repression of religious minorities and attacks by nonstate actors were the two most common drivers of decline in religious freedom, trends born out in the types of attacks we see in the emergency support we provide to individuals under threat for their religious views.

Over the last decade, Freedom House has supported around 1,700 victims of religious persecution, with nearly 300 supported in the last year alone. The top state violators of religious freedom in these cases were China, Vietnam, Iran, Myanmar, and Yemen. Over the last year, top offenders have been Pakistan, India, Egypt, Afghanistan, Iraq, and Yemen.

Unsurprisingly, with the exception of Yemen, all of these countries are ones that have been recommended by this Commission for designation by the State Department as countries of particular concern or placement on the watchlist.

State tactics of repression have included passing legislation that limits people's ability to practice their religion, stripping away rights or privileges enjoyed by religious majorities, and forcing citizens to

¹ Repucci, Sarah, and Slipowitz, Amy. "Freedom in the World." Freedom House, May 1, 2021.
<https://freedomhouse.org/report/freedom-world>.

practice a specific religion. Religious symbols are also frequently targeted, for example by banning or imposing the wearing of specific clothing or the physical destruction of religious symbols. Government harassment is another factor; security forces and government officials, for instance, have engaged in raids and arrests to prevent communities from worshipping, prevented religious minorities from establishing places of worship, or have even destroyed existing places of worship. Government authorities in various countries have also detained, sentenced to prison, tortured, or even killed citizens for not adhering to restrictive laws governing their religious beliefs.

Such reprisals also extend to the online sphere. Our 2021 *Freedom on the Net* report found that in 2020 more governments arrested users for nonviolent political, social, or religious speech than ever before.² Authorities in at least 24 countries pursued new laws or rules governing how platforms treat content. Several of these laws include problematic requirements for social media companies to remove broad categories of speech without court orders, including content deemed to be blasphemous in certain cases. More broadly, officials suspended internet access in at least 20 countries, and 21 states blocked access to social media platforms. Authorities in at least 45 countries are suspected of obtaining spyware or data-extraction technology from private vendors.

And, some authoritarian rulers are extending their violations of religious freedom beyond their own borders. In February of this year, Freedom House released a report on transnational repression, a term used to describe how countries silence their exiles and diasporas abroad. It encompasses a spectrum of tactics, from assassinations, to renditions, to spyware, to intimidation of exiles' family members who have stayed behind.³ While this report did not look specifically at whether victims of transnational repression were targeted due to their religious beliefs, it did document 226 individuals who were targeted based on their identity or belonging, which in some cases includes identity as an ethnic or religious minority.

Even in cases where states may not be perpetrating abuses themselves, some states fail to intervene in or are seemingly indifferent to abuses of religious freedom. For example, it is not uncommon for authorities in Pakistan and Egypt to refuse to file a police report against a perpetrator or force the victim to drop charges. This lack of punishment towards perpetrators normalizes persecution and breeds a culture of impunity. In many cases, religious minorities live in discriminatory environments where they cannot enjoy their basic rights. Minorities are denied educational opportunities or employment simply for their religion or belief, and threats impact their safety, frequently resulting in loss of livelihood and displacement. In many of these countries, a majority religion plays a central role in informing governance, societal norms, and national identity, and religious minorities are often seen as obstacles to unity. A central religion is usually also embedded in nation building projects like education, where curricula might emphasize the majority religion and perpetuate negative stereotypes of minorities.

The majority of abuses of religious freedom in the cases Freedom House has supported through its emergency assistance program were carried out by non-state actors, which includes violent groups like ISIS and Al-Qaeda, but also community members, neighbors, and even family members. From 2011 to 2015, non-state perpetrators were involved in 47 percent of Freedom House's emergency cases.

² Schenkkan, Nate, and Linzer, Isabel. "Out of Sight, Not Out of Reach: Understanding Transnational Repression." Freedom House, February 2021. https://freedomhouse.org/sites/default/files/2021-02/Complete_FH_TransnationalRepressionReport2021_rev020221.pdf.

³ Ibid.

Between 2016 and the present, that number jumped to 80 percent. Violations from nonstate actors include attacks against specific religious groups, the enforcement of a specific religion across a territory, and general violence.

Many of the cases we have supported are illustrative of the threats religious minorities and nonbelievers face by both state and nonstate actors, including cases of apostasy, physical attacks by both state and nonstate actors, rape, forced marriage, and forced conversion in Egypt; a culture of impunity in India that has allowed attacks by Hindu nationalists on religious minorities; ISIS atrocities against religious minorities in Iraq, including murder, kidnapping, conscriptions, forced marriage, forced conversions, rape, and torture; blasphemy charges and forced conversions, including through rape and abduction, in Pakistan.

China: Persecution on a Mass Scale

It is impossible to hold a hearing on religious freedom without a special mention of the egregious violations being committed by the Chinese government. Over the past decade, repression in China has gone from bad to worse. In 2014, China had a *Freedom in the World*⁴ score of 17; by 2020, that had dropped to nine. China ranks 195th out of 210 countries and territories. Tibet ties for dead last. In 2011, China, the world's largest surveillance state, had a *Freedom on the Net* score of 17; this year, it's a ten, making it the lowest scoring country in our net freedom index for the seventh year in a row. These are dramatic rates of decline for that period of time—nearly 50 percent.

Deteriorations in religious freedom are one of the key drivers of that decline. Most well-known in a long list of violations are the widespread crimes against humanity and acts of genocide that have been committed over the last four years against Uyghurs and other ethnic and religious minorities in the Xinjiang Uyghur Autonomous Region, including Christians and atheists. The crimes being committed against the Uyghurs featured heavily in this Commission's hearing on genocide over the summer. Accounts of forced labor, torture, rape, forced sterilizations and forced abortions continue to emerge from the elaborate network of prison camps, which reportedly detain more than one million men, women, and children at any given time.

The abuses being perpetrated against the Uyghurs are, unfortunately, only part of the story. Some officials now working in the Uyghur region fine-tuned their tactics by first targeting Tibetans and Falun Gong practitioners,⁵ and, for decades religious believers including Christians have suffered torture and abuse. In 2017, Freedom House released a report detailing the ways in which the scale and severity of controls over religion were intensifying under Xi Jinping.⁶ The report looked at conditions for eight different groups that together account for over 350 million believers: Chinese Buddhists, Tibetan Buddhists, Taoists, Catholics, Protestants, Uyghur Muslims, Hui Muslims, and Falun Gong practitioners. Research found that at least 100 million of those believers belonged to groups facing

⁴ *Freedom in the World* assesses how people experience their political rights and civil liberties. Our assessment evaluates governmental and non-governmental actions, and our scores are not necessarily a score of the government itself. The enjoyment of rights can vary greatly within a single country. This is why country reports may have scores that differ from the scores given to territories within their boundaries.

⁵ "The Learning Curve: How Communist Party Officials Are Applying Lessons from Prior 'Transformation' Campaigns to Repression in Xinjiang." *China Brief* 19, no. 3 (February 1, 2019). <https://jamestown.org/program/the-learning-curve-how-communist-party-officials-are-applying-lessons-from-prior-transformation-campaigns-to-repression-in-xinjiang/>.

⁶ Cook, Sarah. "Special Report 2017: The Battle for China's Spirit." Freedom House, 2017. <https://freedomhouse.org/report/special-report/2017/battle-chinas-spirit>.

high or very high levels of persecution. If that study were issued today, it would find that persecution has gotten even worse, with large-scale detentions, long prison terms, and physical torture being meted out routinely to Christians, Falun Gong practitioners, and Tibetans throughout China.

Things in Hong Kong are not yet nearly as bad as they are on the mainland, but Hong Kong watchers are anxious about the territory's long-term trajectory. Pastors and religious believers active on political issues have been targeted for arrest or forced to flee along with other prodemocracy voices. The Good Neighbour North District Church, whose leadership and members were active in peaceful, pro-democracy demonstrations, is facing allegations of money laundering, had its bank accounts frozen, and ultimately opted to cease operations in what is widely understood to be a case of political retaliation.⁷ Threats have also reportedly been levied against the former president of the Baptist Convention of Hong Kong, members of the now disbanded Hong Kong Pastor's Network, and Catholic and Methodist churches.⁸ Although still permitted to practice, Falun Gong practitioners have faced increased physical attacks since the National Security Law (NSL) came into effect and calls from pro-Beijing politicians to extend the ban on the meditation practice from mainland China into Hong Kong.

Other religious leaders have been coopted by Beijing, appointed to national bodies such as the Chinese People's Political Consultative Conference (CPPCC) or forced into submission or self-censorship for fear they may have their daily operations jeopardized or lose their tax-exempt status. In June of 2020, China's Liaison Office in Hong Kong hosted a gathering of more than 50 of Hong Kong's religious leaders, including representatives from the Christian, Islamic, Confucian, and Taoist communities. The Liaison office reported after the meeting that attendees had agreed to align their religious doctrines with the NSL "to facilitate its promotion and implementation in Hong Kong."⁹ In August of 2020, the Catholic Diocese of Hong Kong directed the almost 200 primary and secondary schools it runs in Hong Kong to promote a correct understanding of NSL, including fostering "the correct values on [students'] national identity" and respecting the Chinese flag and national anthem.¹⁰

Recommendations

As democracies around the world, including the United States, grapple with how to address the threats and challenges undemocratic rulers pose to global rights and freedoms, it is important that attention be given to how to better protect freedom of religion or belief. As the topic of this hearing rightly suggests, targeted sanctions are an important and powerful foreign policy tool in this effort, and we believe they could be deployed with greater impact.

1. Nations with targeted sanctions programs, including the United States, should make these regimes as strong as possible and should ensure robust funding for implementation and

⁷ Wang, Paul. "Bank Accounts of Protestant Church Frozen in 'political Retaliation'." December 14, 2020.

<http://www.asianews.it/news-en/Bank-accounts-of-Protestant-Church-frozen-in-'political-retaliation'-51847.html>.

⁸Hoi-Hing Chan, Roy. Hearing on the State of Civil and Political Rights in Hong Kong, § Tom Lantos Human Rights Commission (2021).

https://humanrightscommission.house.gov/sites/humanrightscommission.house.gov/files/documents/20211013%20Witness%20Testimony%20Pastor%20Roy_0.pdf.

⁹ <https://bit.ly/3v1KAoq>

¹⁰ Catholic News Agency. "HK Diocese Promotes 'National Identity' Security Law in Catholic Schools," August 11, 2020.

<https://www.catholicnewsagency.com/news/45458/hk-diocese-promotes-national-identity-security-law-in-catholic-schools>.

enforcement. Democratic nations that do not yet have targeted sanctions programs allowing for the sanctioning of violators of religious freedom and other abuses should adopt them.

Targeted sanctions remain incredibly popular with civil society, and, because they are targeted, avoid many of the unintended broader impacts sometimes witnessed with sectoral sanctions. Human rights defenders routinely tell us how impactful targeted sanctions would be if imposed on corrupt officials and human rights abusers in their country, including those who abuse religious freedom. We understand that targeted sanctions cannot serve as a wholesale replacement for local criminal prosecutions. But, particularly in environments with weak rule of law where justice is unlikely to occur locally, targeted sanctions can bring much-needed accountability and even deter future abuses.

In the United States, the Global Magnitsky Human Rights Accountability Act (22 U.S.C. §2656) allows the US government to block or revoke visas and freeze US-based assets of human rights abusers and corrupt foreign officials. Since becoming law in 2016, GloMag has served as one of the United States' most powerful tools for addressing human rights abuses and corruption, with sanctions applied on more than 324 human rights abusers, corrupt actors, and associated entities in 35 countries.¹¹

Under the original GloMag statute, perpetrators of human rights abuses are only eligible for sanction if they have committed violations against individuals seeking to promote or exercise their rights or expose illegal activity carried out by government officials. And, the law permits sanctions only for gross violations of human rights, which in practice has meant that only perpetrators of the most serious violations, such as rape, torture, murder, and disappearance, are likely to be sanctioned. Additionally, because international law has traditionally held that only states are capable of rights violations (since it is only states with the obligation to protect rights), the original GloMag text makes it difficult to sanction non-state actors.

Executive Order 13818, which provides the authority by which most targeted sanctions, including GloMag, are imposed in the United States,¹² sought to address some of these challenges by making it easier to impose sanctions on rights abusers. Specifically, EO 13818 allows for the sanctioning of perpetrators regardless of whether a victim was exercising or promoting a specific right or seeking to expose illegal activity. It also lowers the standard for sanction from “gross violations of international recognized human rights” to “serious human rights abuse,” making it easier for the US government to sanction individuals and entities for a wider range of abuses and easier to sanction non-state actors.

GloMag is one of its underlying statutes for this EO 13818, and is set to sunset on December 23, 2022. This means that existing GloMag sanctions would remain in place, but no new sanctions could be imposed under GloMag.

Freedom House has been working in coalition with nearly 80 organizations and experts, calling on Congress to reauthorize GloMag without delay. We believe reauthorization should be permanent, meaning no new sunset should be imposed, and should codify of the provisions of EO 13818 outlined above that make it easier to impose sanctions on human rights abusers.

¹¹ As of September 2021.

¹² “Blocking the Property of Persons Involved in Serious Human Rights Abuse or Corruption.” Federal Register, December 26, 2017. <https://www.federalregister.gov/documents/2017/12/26/2017-27925/blocking-the-property-of-persons-involved-in-serious-human-rights-abuse-or-corruption>.

Two of GloMag’s most powerful components are the law’s requirement that the US government consider information submitted by Congress, foreign governments, and “nongovernmental organizations that monitor violations of human rights,” and that unclassified information on those who have been sanctioned be publicly available. These two provisions have enabled unprecedented cooperation between civil society, Congress, the Executive Branch, and the United States’ allies and partners that has driven the success of these sanctions to date, and they should be retained.

We also believe serious consideration should be given to including in the GloMag reauthorization bill the ability to sanction family members of perpetrators, something that is currently possible under some of the United States’ other sanctions programs but not under GloMag. Though not always appropriate, the sanctioning of family members can serve as a powerful deterrent for abuses, as many perpetrators have family members who enjoy vacationing and shopping in the United States or have children who seek to attend school in the United States.

Thanks to the support of Senator Cardin, Senator Wicker, and Congressman McGovern, legislative language reauthorizing GloMag is pending in the both the Senate (S.93) and the House (H.R.4350). We are hopeful that reauthorization language can be attached to the Senate’s Fiscal Year 2022 National Defense Authorization Act, which would enable final text to be negotiated and signed into law before GloMag authorities sunset.

There are now more than 30 nations with Magnitsky sanctions regimes.¹³ We believe these programs should align with one another as much as possible. The United States’ GloMag, if reauthorized as outlined above, would provide the ideal model. Because no one is better placed than civil society to identify perpetrators worthy of sanction, it is especially important that each Magnitsky law, including those under consideration in Australia, New Zealand, Japan, and Taiwan, require governments to review information submitted by civil society.

Robust resourcing for sanctions implementation and enforcement is crucial. Since Fiscal Year 2020, Congress has consistently provided funding for Global Magnitsky implementation and enforcement at the Department of the Treasury and Department of State and has directed the Department of Justice to ensure adequate personnel for this purpose. Unfortunately, the number of suspected perpetrators to review for potential sanction continues to outpace the vetting capacity of staff at each of these agencies. Freedom House has been leading the charge, again with the support of nearly 80 organizations and experts, to obtain additional funding for these agencies that would enable the hiring of additional staff to vet, and potentially sanction, a larger number of cases each year.

2. Targeted sanctions should be applied to violators of religious freedom as impactfully as possible and should be part of a robust, comprehensive strategy that employs a full range of coordinated diplomatic and policy actions. As part of this comprehensive strategy, policymakers should seek to avoid unintended consequences for religious minorities in the implementation of foreign policy initiatives.

Global Magnitsky is perhaps the most well-known of the United States’ targeted sanctions programs, but it is not the only program. There are also country-specific regimes; visa blocking under section

¹³ *Amal Clooney, Geoffrey Robertson, and Bill Browder on a Plan B for Human Rights*. YouTube, 2021. <https://www.youtube.com/watch?v=16agpYr6Mdc>.

7031(c) of the Department of State, Foreign Operations, and Related Programs Appropriations Act; and visa blocking under section 212 of the Immigration and Nationality Act, which allows the denial of visas if a person's entry would have "potentially serious adverse foreign policy consequences for the United States."¹⁴ In recent months, the US government has been relying more heavily on sanctions that include only visa bans, some of which prohibit the public naming and shaming of perpetrators.

To ensure maximum impact, the United States should implement the strongest sanction possible, meaning not just visa bans but also asset freezes, and should name sanctioned perpetrators publicly to bring a measure of accountability for the perpetrator and act as a potential deterrent to other would-be-rights-abusers. Sanctions should also be issued in coordination with allies, as was done in March of this year when the United States, Canada, Great Britain, and the European Union jointly imposed sanctions on Chinese officials responsible for rights abuses in the Uyghur Region.

To maximize the impact of targeted sanctions in defense of religious freedom, sanctions should be levied against violators of religious freedom with greater frequency than at present, particularly on leaders in countries where violations of religious freedom are most prevalent. Given that attacks by nonstate actors remain a serious threat to religious minorities, policymakers should review whether existing targeted sanctions programs and criminal laws are adequate for addressing the threats presented by nonstate actors and should update them if necessary.

Regarding sanctions for violations of religious freedom and other rights in China, we believe additional sanctions are needed. Our understanding is that, to date, officials sanctioned have been from Beijing, Xinjiang, Tibet, Fujian, Sichuan, and Hong Kong. Severe violations of human rights and religious freedom continue to occur in parts of China where no official has been sanctioned. Targeted sanctions should be applied in provinces like Guizhou or Zhejiang, where Christians have been persecuted and beaten; in provinces like Liaoning or Heilongjiang, where Falun Gong practitioners are severely persecuted, tortured, and killed; and in Hunan, where a 38-year-old political activist died in custody in 2019. We believe this would help reduce impunity and further empower local activists. We also urge the US to sanctions central government officials, particularly those leading the security apparatus.

Targeted sanctions programs should always be applied as part of a comprehensive and coordinated foreign policy strategy. Too often, sanctions are imposed on a handful of mid-level perpetrators while little changes in terms of policy and diplomacy. To demonstrate the seriousness with which democratic governments view issues of religious freedom, targeted sanctions should be imposed in conjunction with measures such as withholding or conditioning foreign aid and trade agreements based on human rights conditions, including religious freedom; regularly raising religious freedom issues as part of a robust human rights agenda put forth at international bodies; regularly conducting listening sessions with survivors of religious persecution; routinely raising concerns both publicly and privately over abuses and violations of religious freedom, even when abuses may be perpetrated by partners or allies; and regularly calling for the release of religious prisoners.

Governments should ensure there is a coherent strategy around who is sanctioned to avoid sanctioning only low-level perpetrators while leaving the worst offenders untouched. There should be clear steps for the easing of targeted sanctions if perpetrators change their behavior or the protection of rights improves. And, the United States should work with democratic governments and financial

¹⁴ Immigration and Nationality Act, 8 USC 1182 USC 1182 § 212 (1952). <https://www.uscis.gov/laws-and-policy/legislation/immigration-and-nationality-act>.

institutions to ensure there is no unintended overcompliance with US sanctions that negatively impacts civil society, such as groups from sanctioned nations having difficulty accessing funds.

Policymakers should also ensure other foreign policy efforts are not unintentionally promoting discrimination or abuse of religious minorities or supporting abusers of religious freedom. US educational scholarships such as the Fulbright Foreign Student Program are awarded in countries where minorities continue to face discrimination in education. As a result, many minorities do not have access to the fellowships or scholarships awarded. In Pakistan, minorities like Hindus and Christians are often denied educational opportunities, discriminated against in schools, and considered second-class citizens. As such, these minorities are less likely to have the necessary qualifications to receive scholarships. Special attention should be given to ensure the participation of religious minorities in such programs. The involvement of religious minorities in US scholarship programs can improve the position of minorities in their communities by demonstrating that minorities – who are perceived to be second class-citizens – can attain success the same as those belonging to the majority religion.

- 3. The United States and other governments should expand the view of what is considered successful impact for targeted sanctions.** Traditionally, the primary purpose of targeted sanctions has been to change behavior. This is certainly the ideal outcome. But, on more than one occasion, I have heard government officials doubt the utility of sanctions in situations where they do not believe sanctions would end abuses. Accounts from the ground demonstrate that the range of positive impacts extends beyond this traditional definition of success. I have also heard skepticism that targeted sanctions have the power to change behavior at all.

Freedom House is working on a survey of human rights defenders and civil society leaders that we hope will capture the full picture of civil society perceptions, good or bad, surrounding the impact of targeted sanctions. In the meantime, there are a number of anecdotes that reveal a range of positive impacts resulting from targeted sanctions.

In China, there have been several reports of Falun Gong believers being released from detention because local police were concerned about potential sanctions, especially the effect they might have on their children's ability to travel to the US, after local activists alerted them to US sanctions imposed on other Chinese officials. US sanctions on officials responsible for the deterioration of rights in Hong Kong provided much-needed encouragement for Hong Kong's prodemocracy movement at a moment when protestors were feeling ignored and beaten down.¹⁵ The US's sanctions signaled that the world shared the protestors' outrage about what was happening. And, when Hong Kong Chief Executive Carrie Lam, one of the officials who had been sanctioned, complained in interviews that sanctions had greatly inconvenienced her life, Hong Kongers told us privately that even though sanctions wouldn't remedy all the Hong Kongers had lost, they took comfort knowing that at least some of the architects of Hong Kong's repression wouldn't go totally unpunished.¹⁶

¹⁵ Treasury Department. "Treasury Sanctions Individuals for Undermining Hong Kong's Autonomy." Accessed October 25, 2021. <https://home.treasury.gov/news/press-releases/sm1088>.

¹⁶ He, Laura. "Hong Kong Leader Carrie Lam Is Getting Paid in Cash Because Banks Won't Deal with Her." CNN, November 30, 2020. <https://www.cnn.com/2020/11/30/business/hong-kong-carrie-lam-cash-intl-hnk/index.html>.

Some Russia analysts believe sanctions on key individuals in Russia are helping drive a wedge between the nation's power players.¹⁷ Sanctioned oligarchs – who are able to profit from Russia's corrupt system in exchange for loyalty to the regime – have complained publicly about sanctions upending their personal lives and business dealings. One person even lamented that sanctions had caused a “complete crisis” in their life, prohibiting them from seeing their US-based family and freezing more than a billion dollars in US banks.^{18,19}

Targeted sanctions in the Democratic Republic of the Congo on influential officials around former president Joseph Kabila raised pressure on him to abandon efforts to seek an unconstitutional third term in office. As those sanctions got closer to Kabila himself and coordinated diplomatic pressure mounted, Kabila was forced to relent.

Targeted sanctions signal international condemnation of specific perpetrators and abuses. But as the above examples demonstrate, they also have a concrete effect on the cost-benefit analysis of high- and low-ranking officials as they consider to what extent they wish to align themselves with anti-democratic regimes and practices. Targeted sanctions also energize civil society to keep pushing for the rights to which they are entitled. They are the rare foreign policy tool around which activists of all stripes can rally. Coordinated efforts to impose targeted sanctions have brought fractious coalitions together and even served as a launching point for additional coordinated advocacy efforts among diaspora and human rights groups. Governments should take impacts such as these into consideration when determining who to sanction.

Conclusion

In a world where authoritarians are increasingly seeking to rewrite global rules and redefine norms to conform to their narrow, repressive views of what is permissible in terms of belief, speech, expression, association, and even identity, it is impossible to pretend that human rights issues are not intertwined with – and increasingly even one and the same as – security and economic issues.

We are, all of us, either believers, nonbelievers, seekers, or agnostics. Matters of religious freedom impact the security and prosperity of us all, and if the leaders of the world's democratic nations continue to pretend that religious freedom is a niche issue it will be to our detriment, and to theirs. Thank you to the Commission for the good work you are doing to mainstream the issue of religious freedom and highlight and remedy the abuses that are occurring. We look forward to continuing to labor with you in this important effort.

¹⁷ Snegovaya, Maria. “The Impact of Sanctions on Russia's Poles of Power.” cepa.org: Center for European Policy Analysis, July 2018. https://docs.wixstatic.com/ugd/644196_cd984c793c1642b2b7f5ff21ac4e4af5.pdf.

¹⁸ Treasury Department. “Treasury Designates Russian Oligarchs, Officials, and Entities in Response to Worldwide Malign Activity,” April 6, 2018. <https://home.treasury.gov/news/press-releases/sm0338>.

¹⁹ Kovalev, Alexey, Reiter, Svetlana, and Dmitriev, Denis. “The Next Wave: The West Is Preparing a New Round of Sanctions against Russia, but Who Really Pays, and What's the Point, In the End?” Meduza, February 16, 2021. <https://meduza.io/en/feature/2021/02/16/the-next-wave>.