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2022.2.21	2	1. 2. 3.
2022.2.22	OFAC 3 4	1. 2. 3 44 5 Specially Designated Nationals and Blocked Persons SDN VEB PSB
2022.2.24	OFAC 5	1. Sberbank 25 2.
2022.2.24	OFAC 6	13
2022.2.28	OFAC 7 8	
2022.3.1	OFAC 9	1. 2. 3.
2022.3.8	10	1. 2.

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2022.5.2	OFAC <sup>11</sup>	1. 2. 3. 4. 5. 6. 7.
2022.2	OFAC <sup>12</sup>	SDN

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National Emergencies Act

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Support for the Sovereignty, Integrity, Democracy, and Economic Stability of

Ukraine Act of 2014

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Ukraine

Freedom Support Act of 2014

3 2017

Countering America's

Adversaries Through Sanctions Act

4 2022

Ending Importation of

Russian Oil Act

5 2022

Suspending Normal

Trade Relations with Russia and Belarus Act

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Global Magnitsky Human Rights Accountability Act

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Antiterrorism and Effective Death Penalty Act

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Arms Export Control Act

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Comprehensive Iran Sanctions, Accountability, and Divestment Act

of 2010

Iran Threat Reduction and Syria Human Rights Act of 2012

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Cuban Liberty and Democratic Solidarity Act of 1996

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	2014.12 EO13685 2014
	2015.4 EO13694
	2016.12 EO13757  13694
2017.8	
	2018.9 EO13849
	2021.4 EO14024

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	2021.8 EO14039
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38		Title	Part
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40			2018 1 13
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		5	
	Non-delegation Doctrine		Legislative Veto
	United States v. Amirnazmi, 645 F.3d 564, 576 (3d Cir. 2011)		United States v. Mirza, 454 F. App'x 249, 256 (5th Cir. 2011)
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The Office of Foreign Assets Control

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<sup>42</sup> OFAC

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Ukraine-/

Russia-Related Sanctions

Russian Harmful Foreign Activities

Sanctions OFAC

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OFAC SDN

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10 OFAC

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cautionary letter

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Fedwire

Clearing House Interbank Payments System CHIPS SWIFT Fedwire

<sup>54</sup> CHIPS

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**4 OFAC 2014—2022**

2017.7.20	ExxonMobil Corp.		2014 Rosneft SDN SND	Rosneft SDN SND	2017 2 000 000
2018.11.27	Cobham Holdings Inc.		2014—2015		OFAC 87 507
2019.4.25	Haverly Systems Inc.		2016—2017 JSC Rosneft		OFAC 75 375

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2020.7.8	Amazon.com Inc.		2011—2018	OFAC	134 523
2020.9.9	Deutsche Bank Trust Company Americas		Open Joint Stock Company Krasnodar Regional Investment Bank	OFAC	425 600
2020.12.30	BitGo Inc.			OFAC	98 830
2021.2.18	BitPay Inc.			OFAC	507 375
2021.7.23	Payoneer Inc.		SDN	OFAC	1 385 901.40
2021.9.21	Cameron International Corporation		Shelf	Gazprom-Neft	OFAC 1 423 766
2022.4.1	S&P Global Inc.		2016—2017	JSC Rosneft	OFAC 78 750

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Joint Stock Company Alfa Bank

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80%

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<https://www.chinaneews.com.cn/gj/2022/03-07/9694997.shtml>

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SWIFT

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2020 6 17

Uyghur Human Rights Policy Act

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Hong Kong Autonomy Act

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Non-SDN Chinese Military-Industrial Complex Companies NS-CMIC

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 United States—Measures Relating to Trade in Goods and Services Request for Consultations by Venezuela, WT/DS574/1.  
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## —Understanding the Asymmetry of Financial Countersanctions

SHEN Wei FANG Li

As Russia-Ukraine crisis escalates in 2022, the Western countries led by the U.S. have imposed unprecedented financial sanctions against Russia at large scale and multiple levels. The U.S. has well established the legal framework and implementation mechanism of financial sanctions against Russia. The Congress has passed five Russia-related sanctions Acts. The U.S. presidents have issued Executive Orders in response to the volatile situations. The U.S. Office of Foreign Assets Control (OFAC) manages and implements two sanctions programs in relation to Russia, makes sanctions regulations, updates sanctions lists and enforces the law. In response, Russia has taken a series of countersanctions, with three central factors economic securitization, Russification of key sectors and diversification of foreign economic relations. Russia's countermeasures include financial transactions restraints, foreign assets nationalization and sanctions compliance blocking. The confrontation between the U.S. financial sanctions and Russia's countersanctions is asymmetric in two ways. On the one hand, Russia's financial powers makes a tit-for-tat countersanctions strategy hard to be deployed. On the other, Russia seeks to leverage its energy powers as a counterweight to U.S. financial powers. The suggestions for China include improvement on the countersanction legal system, acceleration of RMB internationalization and de-dollarization process, and strengthening of international economic and financial ties.

Financial Sanctions; Countersanctions; Russia; Asymmetry