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# Enforcing US Economic Sanctions: Why Whale Hunting Works

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# Enforcing US Economic Sanctions: Why Whale Hunting Works

No country in the world employs economic sanctions more than the United States. The way the US government enforces these sanctions can have billion-dollar ramifications for companies, alter global markets, and cause or help resolve foreign policy crises. Sanctions enforcement actions taken during the Obama administration against major European banks—including Credit Suisse, ING Bank, and BNP Paribas—resulted in billions of dollars of fines and fundamentally altered the way the global financial industry assesses the risks of doing business with sanctioned states. The US enforcement action taken recently against Chinese tech giant ZTE for violating US sanctions and strategic trade controls has also emerged as a contentious focal point in US-China relations during the Trump administration.

Outside these high-profile cases, surprisingly little is known about the strategies used to enforce US sanctions. The US Department of Treasury's Office of Foreign Asset Control (OFAC) is the agency primarily responsible. For the breadth of its mandate, the agency has remained relatively small and underfunded.[1] Since the early 2000s, however, OFAC—despite significant resource limitations—has evolved into an extraordinarily powerful enforcement agency with a global reach.

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