



Living Our Democratic Values

Protecting human rights and upholding democratic values has been a perennial goal for presidents of both major political parties in the United States. Yet the current administration has abandoned our democratic allies and values by embracing authoritarian leaders, enabling corruption, and engaging in a transactional foreign policy. The next administration must take immediate steps to reverse harmful policies and halt human rights violations in U.S. domestic and foreign policy, demonstrating through words and deeds a renewed commitment to living our values.



Over successive administrations, the United States has strived—however imperfectly—to uphold democratic values. Yet the current administration has actively undermined those values, damaging America’s democratic institutions and attacking the very idea of universal human rights.¹ President Donald Trump has coddled dictators and repudiated America’s most reliable treaty allies.² In the process, his administration has hobbled America’s ability to pursue its founding principles at home and abroad. Rebuilding America’s support for democracy and respect for human rights will take serious time and energy, and the next administration must get started immediately in January 2021.

The damage that the next administration will need to repair is immense. It is hard to overestimate the harm that the current administration has inflicted. From daily attacks on the free press³ to intervening in Justice Department investigations⁴ to using the Oval Office to promote private business interests,⁵ the Trump administration has assaulted fundamental norms that American presidents and leaders have long upheld. It has sought to disenfranchise voters and violate the basic human rights of minorities, women, immigrants, migrants, and LGBTQ individuals.⁶ The president has repeatedly fanned the flames of xenophobia and racism,⁷ and he has encouraged violence against people who were peacefully protesting against structural racism in America.⁸

At the same time, the current administration has pursued a transactional foreign policy bereft of values. This has severely weakened U.S. influence, undermined America’s standing and credibility in the world, and hampered its capacity for doing good. Russian President Vladimir Putin intervened in the 2016 election to help Trump win,⁹ and later, Trump was impeached for attempting to extort Ukrainian President Volodymyr Zelensky to help him with his reelection campaign.¹⁰ Trump has repeatedly praised and expressed an affinity for dictators—including Kim Jong Un,¹¹ Vladimir Putin,¹² Abdel Fattah el-Sisi,¹³ and Xi Jinping¹⁴—while disparaging democratic allies. Moreover, Trump’s administration has dismissed a wide range of international institutions and efforts designed to advance human rights, from withdrawing from the U.N. Human Rights Council¹⁵ to walking away from the Global Compact on Migration¹⁶ to bullying the International Criminal Court (ICC).¹⁷

This cumulative damage has only exacerbated the challenges faced by the United States and others around the world. Trump’s rise to power is part of a broader wave of populism that swept across other countries. Meanwhile, authoritarian governments such as China, Russia, and Saudi Arabia have felt emboldened to assert their influence abroad and have increased their efforts to undermine democracies and liberal norms around the world.¹⁸ As populist and authoritarian forces have grown, democracies have

experienced setbacks.¹⁹ From Turkey to Hungary to Thailand, strongmen leaders have gutted democratic norms and institutions in countries that were once seen as ascendant democracies. While this downward trend existed before the Trump administration, it only accelerated once these backsliding democracies received a green light from the president of the United States.²⁰

Intensifying all of these challenges has been the inability of international institutions to adequately tackle the world's biggest challenges. From the coronavirus pandemic and climate change to the ongoing civil war in Syria and Russia's invasion of Ukraine, the U.N. Security Council and other international organizations, hamstrung by the loss of effective U.S. leadership, have been largely unable to forge solutions. While much of the fault lies with governments not empowering institutions and preventing them from acting, the failure of 20th century international institutions to effectively tackle the world's biggest problems, regardless of the reasons, has further sapped confidence in them.

While the longer-term consequences of the coronavirus pandemic remain unclear, authoritarian governments are already attempting to take advantage of the absence of U.S. leadership. China is trying to act like a leader in responding to the crisis through propaganda abroad and censorship at home.²¹ Russia and China are both aggressively advancing disinformation meant to undermine democratic governments.²² And leaders in dozens of countries are taking advantage of the crisis to tighten their grip on power.²³ Meanwhile, even in more advanced democracies—including the United States—minorities are under siege and people are continuing to lose faith in the ability of governments to solve today's biggest problems.²⁴ If democratic leaders do not get their acts together in tackling the pandemic, this global health crisis could also become a global democracy crisis.

It is as important as ever to remember why it is in America's interests that other countries uphold human rights and protect democratic institutions. Democracies are more likely to grow their economies sustainably over time, less likely to fight wars with one another, and more likely to protect human rights.²⁵ A world with more democracies is a safer, more just, and more prosperous world.

In its first 100 days, the next administration—whether under a President Donald Trump or a President Joe Biden—should therefore prioritize the following efforts to put the United States on a path to living its values at home and abroad:

1. Strengthen American democracy and protect human rights at home.
2. Defend our democracy from foreign interference.
3. Put democratic values and human rights at the center of U.S. foreign policy.
4. Leverage democratic allies and partners.
5. Tackle corruption around the world.

The recommendations that follow provide a range of options for advancing these efforts.

Strengthen American democracy and protect human rights at home

Structural problems with America's democracy have taken a steep toll in recent years, from police brutality, racism, and inequality to criminal justice practices to perceived and actual voter suppression—all of which undermine confidence in the fairness and justice of democratic institutions. Persistent and worsening political polarization has ground congressional cooperation to a halt and prevented even overwhelmingly popular legislation from passing. Americans are right to wonder whether their government can serve their interests. According to public polling, Americans' satisfaction in their style of government is at a record low, rising from less than 1 in 4 dissatisfied citizens in 1995 to more than half of the country today.²⁶

The next administration must be prepared to demonstrate to Americans that the government can once again work for them, beginning by launching an ambitious effort to strengthen democracy and human rights at home. It must pursue bold policies designed to address structural problems such as police brutality, racism, and inequality. It must take steps to make it easier for citizens to vote and clean up both legal and illegal corruption that drowns out the interests of ordinary Americans. And it must put forward a leadership team that reflects America in all its diversity and engages all citizens in tackling long unresolved injustice and achieving the nation's full potential.

Restoring confidence in U.S. democracy is inextricably linked with efforts to strengthen and restore America's role in the world. Structural racism and systemic police brutality, which were at the root of the mass protests that erupted in 2020 in response to the murder of George Floyd, not only violate people's human rights but also create weaknesses and divisions in democracy that can be exploited.²⁷ These violations are made worse when they are sanctioned by U.S. leaders, as they were when President Trump violently dispersed peaceful protesters in front of the White House who were exercising their right to freedom of speech. In recent years, this administration has also punished, rather than protected, those seeking safety from persecution, separating families in an ill-advised campaign to deter migrants from America's southern border and denying them lawful asylum. Closing America's doors to those seeking to flee persecution and poverty erodes the model that America has long striven to be.

Strengthening American democracy and respecting human rights at home will require reversing many of the current administration's policies and forging new large-scale initiatives to address the human rights violations that weaken American democracy. The United States must improve its own record on human rights if it intends to be a global leader—and it should want to do so. Democracies that respect human rights lead to a safer, more prosperous world. The next administration must therefore refine its focus on protecting the homeland to more fully account for the broader needs of human security, such as child care, health care, work, and education—which the coronavirus pandemic has demonstrated are essential to the nation's broader health and security.



QUICK WIN: Use the president's first address to Congress in January to call for strengthening democracy at home and defending democratic values abroad. The next administration will need to address the deep challenges it faces as a result of systemic racism, an economic downturn, and an ongoing global pandemic. The first speech before Congress will provide an ideal opportunity to make a powerful connection between what it will take to strengthen the union and improve America's global position in a more competitive world, where democracy is receding and authoritarianism is on the rise.

- **Take action in the first 100 days to tackle multiple overlapping crises and challenges to U.S. democracy at home.** Challenges such as the COVID-19 pandemic, a hard-hit economy, economic inequality and other systemic inequities, the climate crisis, and dangerous attacks to the U.S. democratic system by elected leaders all pose a threat to the stability of the United States. Early presidential and legislative initiatives on these issues in the first 100 days will reassure U.S. allies and partners and improve America's credibility abroad.



QUICK WIN: Immediately change existing U.S. policies that violate human rights. The next administration will need to demonstrate in actions and words a real commitment to protecting and promoting human rights at home, including by reversing problematic policies of the current administration. The Center for American Progress has written extensively on many of these topics, such as the need to end the domestic gag rule;²⁸ rescind the illegal "Muslim travel ban" restrictions (executive orders 13769 and 13780);²⁹ halt family separation and other abusive tactics at U.S. borders and end attacks on asylum-seekers, including Executive Order 13841;³⁰ and restore protections for LGBTQ patients in health care settings.³¹

Defend our democracy from foreign interference

Foreign interference in U.S. elections continues to be a serious threat to the integrity of America’s democratic process.³² In attacking elections, America’s adversaries are seeking to diminish the confidence of U.S. citizens in the processes that are at the very core of U.S. democracy. In 2016, election interference was not only tolerated but also invited by then-candidate Trump.³³ In 2020, any election interference by foreign actors should be met with a decisive response.

The next administration should draw a sharp contrast between the passive response to election interference in 2016 and an active response to any interference in 2020. Doing so will require the next administration to be prepared not only to investigate any foreign interference but also to advise the public about it and respond. Careful plans and principled frameworks for publicly disclosing foreign interference efforts and deterring future actions should be developed in advance to aid decision-making. Above all, the next administration should stay laser-focused on restoring Americans’ faith in the electoral process.



QUICK WIN: Convene the National Security Council (NSC) to address foreign interference. Pursuant to Executive Order 13848, the director of national intelligence will need to offer an assessment on foreign interference within 45 days of the election.³⁴

The president should convene the National Security Council—possibly as the first NSC meeting—to consider intelligence and response options for any interference that the Office of the Director of National Intelligence (ODNI) identifies.



QUICK WIN: Issue a declaratory statement on foreign interference and outline consequences for it. The next administration should issue an early statement that condemns any foreign interference in U.S. elections and explains that the administration will treat it as an adversarial act that significantly affects the relationship between the United States and the interfering nation’s government. The statement should outline how the administration will leverage all appropriate instruments of national power to impose substantial and lasting costs on state perpetrators.



QUICK WIN: Express support for bipartisan legislation on election interference. Smart, bipartisan bills that would strengthen deterrence and provide funds to prevent election interference have languished in Congress.³⁵ The next administration should express support for bipartisan legislation on election interference and tell the next Congress to pass these bills and send them to the president for signature.

- **Announce a regulatory agenda to address the harms created by new technologies and large technology companies.** In the first 100 days, the next administration should develop a broad domestic agenda to address and regulate the harms created by new technologies and large technology companies, with a focus on privacy, disinformation, competition, and new regulatory models. This new domestic technology agenda should be developed in conjunction with a new international agenda in order to ensure an aligned approach to technology at home and abroad.
- **Implement National Defense Authorization Act (NDAA) provisions to: 1) create a counter-malign influence center at ODNI; 2) create a social media data center; and 3) appoint a counter-foreign interference coordinator.** These provisions represent a significant step toward addressing key vulnerabilities in U.S. democracy and countering interference from an increasing number of state actors. The next administration should take immediate steps to implement these efforts as part of broader efforts to prevent and deter future election interference.
- **Establish a clear mission for the Global Engagement Center and mobilize it for action.** While the Global Engagement Center has had a rocky start, it still has great potential to lead U.S. interagency efforts to proactively address foreign adversaries' attempts to use disinformation and propaganda to undermine U.S. democracy and interests.³⁶ Poor leadership and high turnover have hampered the effectiveness of this promising center. The next administration should establish a clear mission for the Global Engagement Center and mobilize it to focus not only on identifying foreign interference but also on coordinating efforts to expose adversarial false narratives publicly, helping Americans and other audiences understand the need to be vigilant about the threat of disinformation.
- **Convene a high-level meeting with tech companies on ways to enhance cooperation while protecting privacy and free speech.** Technology companies clearly play an important role in today's political environment. The next administration should convene an early meeting with relevant companies to discuss opportunities to enhance cooperation and protect privacy and free speech. This meeting could be timed to coincide with the opening of ODNI's Social Media Data and Threat Analysis Center established by the 2020 NDAA.

- **Announce a public-private partnership on digital literacy and civic education.**

Simple policy solutions that would increase digital literacy and civic education among the American population could help weaken attempts by U.S. adversaries to sow discord in U.S. democracy.³⁷ The administration should announce a public-private partnership to kick-start these programs, with the goal of increasing awareness of gaps in digital media literacy and protecting future elections.

Put democratic values and human rights at the center of U.S. foreign policy

As the next administration works to address challenges to democracy at home, it will also need to dramatically reset its approach abroad. Past debates on U.S. foreign policy have centered on a false competition between values and interests, but they are mutually reinforcing. Indeed, democratic values should be a primary driver of U.S. national security strategy in a century that could largely be defined by a contest between democratic and authoritarian systems.

Unfortunately, the current administration has failed to grasp the competitive power of American values. Instead, the Trump administration has cozied up to dictators and autocrats and pursued purely transactional relationships with America's democratic allies.³⁸ Moreover, it has questioned the very idea of universal human rights³⁹ and abandoned vulnerable groups while they were under threat.⁴⁰ The Trump administration has walked away from multilateral forums such as the U.N. Human Rights Council,⁴¹ all while gutting funding for global health, development, and human rights bodies that sought to help vulnerable communities.⁴²

Putting democratic values and human rights back at the center of U.S. foreign policy should not be confused with discredited notions of regime change or of America seeking to reshape the world in its image. Humility will be essential to a renewed U.S. approach. In fact, it will be important to acknowledge that while the United States can still serve as an important catalyst for action, other allies and partners may be able to more effectively lead on many of these issues.

In the first 100 days of the next administration, there are some key steps that can be taken to center U.S. foreign policy around democratic values in order to secure a more democratic and just world.⁴³



QUICK WIN: Use the occasion of Human Rights Day on December 10, 2020, to issue a statement to signal a new approach to human rights. This statement from the president or president-elect should include an affirmation of the U.S. commitment to international organizations and agreements that promote human rights, including an announcement of intent to rejoin the U.N. Human Rights Council, sign the migration and refugee compacts, reengage with the U.N. LGBTI Core Group⁴⁴ and the Equal Rights Coalition,⁴⁵ and bring U.S. advocacy in line with promoting these rights in all international forums.

- **Prioritize defending democracy as a vital national interest in the next administration's National Security Strategy.** The National Security Strategy (NSS) is the key mechanism for outlining the president's top national security priorities. The next administration should prioritize defending democracy and pushing back on authoritarian competitors as a vital national interest and a strategic priority worthy of serious effort and investment. Doing so will signal a strategic shift from the 2017 NSS, which did not prioritize defending democracy, and will send a strong message to the American people, to Congress, and to foreign constituencies.



QUICK WIN: Disavow the approach outlined by the final report of the State Department's Commission on Unalienable Rights. Secretary of State Mike Pompeo used the commission's report to wrongly suggest that prioritizing certain human rights, namely freedom of religion and property rights, over others is "desirable" in U.S. foreign policy.⁴⁶ This is a profound and dangerous misunderstanding of the interconnected nature of universal human rights and their role in U.S. foreign policy. The next administration should disavow Pompeo's current approach, emphasize that it is not intended to guide future U.S. policy, and reaffirm the commitment of the United States to the interconnected and interrelated understanding of universal human rights. The next administration should also review and consider rescinding Executive Order 13926, which calls for the State Department and the U.S. Agency for International Development to prioritize international religious freedom in diplomacy and programming.⁴⁷

- **Take immediate action to support the forcibly displaced.** Worldwide, some 79 million people are currently displaced because of conflict or persecution—marking the highest total since World War II.⁴⁸ Rather than lead the world in responding to this need, President Trump has used statutory authority to unilaterally ban broad categories of people from entering the United States, targeting individuals from Muslim-majority countries,⁴⁹ asylum-seekers,⁵⁰ large classes of immigrants and nonimmigrants,⁵¹ and others. Each year, the Trump administration has also allowed fewer and fewer refugees to be admitted into the United States by setting record-low targets in the annual presidential determination process.⁵² Addressing the worst refugee crisis of this century will require a comprehensive response that extends well beyond the first 100 days; however, to signal an immediate policy shift, the next administration should take the following actions:



QUICK WIN: Sign the migration and refugee compacts. Although the Trump administration has not done so, 180 countries signed the agreement on migration and 181 countries signed the agreement on refugees, pledging to support efforts to reduce the causes of migration and reaffirming the rights of asylum-seekers.⁵³ Signing these compacts would send an important signal that the United States intends to support international efforts to protect the forcibly displaced during a time of unprecedented global need.

- **Rescind entry bans and revise Section 212(f) of the Immigration and Nationality Act.** The president should rescind existing entry bans imposed by presidential proclamation and work with Congress to rewrite Section 212(f) of the Immigration and Nationality Act—8 U.S.C. 1182(f)—to provide important substantive, procedural, and temporal checks against future presidential abuses such as those contained in the National Origin-Based Antidiscrimination for Nonimmigrants (NO BAN) Act.⁵⁴
- **Protect and promote women’s rights.** The next administration must prioritize women’s health and rights at home and abroad, including by rolling back the current administration’s attacks on reproductive health and committing the United States to fully protect and uphold sexual and reproductive health and rights—such as abortion, contraception, and breastfeeding—in international treaties and documents, funding, and policy statements.



QUICK WIN: End the Global Gag Rule (also known as the Mexico City policy). This rule restricts U.S. global health funding from organizations who work on reproductive rights.⁵⁵ The Trump administration adopted an expansive Global Gag Rule that covered all U.S. health funds, affecting billions in foreign aid and preventing millions of women and families from accessing critical health services. The next administration should stand up for women’s health and rights by rescinding the rule. Moreover, it should support the Global Health, Empowerment, and Rights (HER) Act, which would permanently ban the Global Gag Rule.



QUICK WIN: Clarify the Siljander Amendment. The administration should issue a presidential memorandum or executive order clarifying the Siljander Amendment (1981) and defining what qualifies as lobbying for or against abortion.⁵⁶ The amendment can bar U.S. foreign aid from any activity that could be constituted as lobbying. The executive order should clarify that interpretation should be extremely narrow in order to allow for greater access to abortion and reproductive health across all U.S. assistance.

- **Support and defend democratic voices.** The United States should work together with international partners to strengthen international norms regarding the rights of citizens to mobilize peacefully for greater human rights and engage in nonviolent protest against their respective governments. Specifically, the next administration should 1) include in its first budget a request that Congress expand funding for the National Endowment for Democracy, the National Democratic Institute, and the International Republican Institute, all of which invest in and work to strengthen democracy worldwide; and 2) work with international partners to launch an effort to develop principles for supporting peaceful protest movements, which would include efforts to deter and punish states that violently crack down on their own people.



QUICK WIN: Encourage the secretary of state to meet with civil society nongovernmental organizations on all trips. Civil society is under threat in countries around the world, from autocracies to backsliding democracies.⁵⁷ In addition to providing robust assistance to civil society organizations abroad, the next administration should immediately announce a commitment that all senior officials—including the president, vice president, and secretary of state—will meet with civil society organizations and representatives on foreign trips, whenever possible. This would send an important signal that the United States supports civil society everywhere and that America’s relationships with the people of each country are just as important as its relationships with the governments.



QUICK WIN: Lift sanctions on the International Criminal Court. While the United States has always had a fraught relationship with the ICC, the Trump administration has treated the court like an enemy, authorizing sanctions against ICC personnel involved in cases against Americans.⁵⁸ As a first step toward engaging constructively with the ICC, the next administration should immediately revoke Executive Order 13928.⁵⁹

- **Build a stronger bureaucratic infrastructure to elevate democracy and human rights concerns across the government.** To elevate the importance of democracy and human rights in U.S. foreign policy, the next administration will need to establish a strong infrastructure to ensure that these issues remain elevated in the interagency policy process.



QUICK WIN: Reestablish a democracy and human rights directorate within the NSC staff. The next administration should restore the directorate on democracy, human rights, and development in the National Security Council. The NSC staffs of the Obama, Bush, and Clinton administrations had directorates explicitly tasked to cover human rights and democracy to ensure that they remained a focus at the White House. This directorate should cover a broad mandate including human rights, democracy, development, and foreign assistance issues.



QUICK WIN: Make the assistant secretary for democracy, human rights, and labor an early appointment. After Cabinet-level positions are announced, the next administration should quickly announce the nominee for assistant secretary of the Bureau of Democracy, Human Rights, and Labor. Announcing this position immediately would signify the importance of human rights in U.S. foreign policy. President Trump did not announce a nominee for the office until June 2019, 2 1/2 years into his administration.

Leverage democratic allies and partners

The president must immediately begin working closely with democratic allies and partners. Whether with treaty allies in Europe and Asia, democracies in Africa and Latin America, or multilateral organizations such as the Community of Democracies, the more the United States engages with its democratic friends around the world—including by showing tough love when these countries or organizations fall short of upholding democratic principles—the more effective the United States will be in ensuring that it addresses global challenges in ways that uphold core values.

The Trump administration has abandoned one of America's strongest assets in foreign policy: its democratic allies. From criticizing these allies⁶⁰ to shunning multilateralism,⁶¹ the current administration has unilaterally undermined America's ability to pursue foreign policy goals alongside the world's most capable partners. The next U.S. president will need democratic allies, whether to respond to the global economic devastation of the pandemic or to confront China's destabilizing behavior.

The next administration will have to move quickly. Some actions in its first 100 days must aim to prove to democratic allies that America will once again respect its partnerships with democracies, whether by prioritizing democracies in meetings and travel, reaching out to them to chart new directions on key issues, or just saying the right things in speeches.

The president will also have to move quickly to establish new patterns of cooperation with democracies in order to adapt to a world that is rapidly changing. As populism erodes democratic institutions and norms toward majoritarianism and as authoritarians push their influence abroad, America must pursue a new level of cooperation with the world's democracies with the goal of both bolstering the strength of individual democratic systems and strengthening alignment among democracies on key global challenges.

In addition, the next administration will have to look for new ways to strengthen America's capacity to help its democratic allies by working with Congress to prioritize foreign assistance and other support to democracies.

- **Host a global summit of democracies.** In the first 100 days, the president should announce that the United States will convene a first summit of democracies in 2021 to signal solidarity with the world’s democracies and the key role that the United States intends to play in prioritizing its relationships with democracies. The Community of Democracies can provide the main vehicle through which to organize this summit, which will have the added effect of bolstering a key institution for democracies to coordinate and address key challenges.⁶² Civil society organizations from around the world—which participate in the Community of Democracies processes—should be invited to join this summit. The agenda for this first meeting should be focused on protecting democratic elections and systems from outside influence, sharing lessons learned, and developing common policy ideas to prevent future interference. To avoid giving elected authoritarians a free pass, it may also be worth considering excluding democratic countries, such as Hungary and Poland, that are slipping with respect to protection of minorities, judicial independence, or press freedom.
- **Launch a Democratic Strategic Advantage Initiative.** The president should announce his intention to create a Democratic Strategic Advantage Initiative to prioritize and organize U.S. foreign assistance to support democracies, and he should include the proposal in the next budget. This initiative would authorize the U.S. government to amplify and better synchronize U.S. economic and security assistance and commercial investment packages. For example, in addition to increased economic assistance, the United States should coordinate its current tools for security assistance—from arms sales or grants to military training to technology transfers—in order to give democracies a strategic edge over authoritarian adversaries. And in addition to supporting democracies with packages that include all relevant tools of U.S. statecraft, the administration should request that Congress include as part of the initiative a separate set of foreign assistance funds for democracies—like Congress does for the Millennium Challenge Corporation—in part to resist the need for trade-offs in the budget process with assistance to other, nondemocratic countries. While it will take time to work with Congress and relevant agencies to establish the details, the administration should begin that process immediately and signal that the United States will prioritize countries that are transitioning to democracy—or have recently done so—for special support from the United States.

- **Prioritize principal-level trips to democracies.** The president, vice president, and secretary of state should make their first trips of 2021 to democratic allies. This will send the right message about the values and partners that the next administration prioritizes.
 - **Prioritize early engagement with Mexico, Canada, and Europe.** Traditionally, a president’s first meeting with a foreign leader in Washington, D.C., is with the leader of Mexico, and the first foreign trip is to Canada. The next president or president-elect should flip this script, underscoring the importance of America’s partnerships with its closest neighbors by hosting the Canadian leader in D.C. and taking a daytrip to meet with his Mexican counterpart before inauguration if possible to do so safely with COVID-19 restrictions. Post-inauguration, the president’s first international trip should be to Europe, and in the first 100 days pending public health guidelines, the president should announce that he will attend the annual East Asia and Asia Pacific Economic Cooperation summits in the fall.
 - **The Cabinet should prioritize engagement with democracies in the first 100 days.** To emphasize the importance of America’s democratic alliances, the vice president and secretary of state should take trips to Asia and Europe in the first 100 days, with one going to each region. Specific recommendations can be found in a later section of this report on “Recalibrating U.S. Global Relationships.”

Tackle corruption around the world

For more than four decades, the United States has been perhaps the most prominent advocate for and enforcer of anti-corruption norms and transparency standards in the international system. Under the current administration, however, the United States has ceded its leadership position and moral authority in the global fight against graft.⁶³ Since the beginning, the Trump administration has slashed funding for vital anti-corruption programs,⁶⁴ rolled back key regulations and initiatives related to political and corporate transparency,⁶⁵ and allowed governments in places such as Guatemala and Honduras to quash popular anti-corruption initiatives in the name of security cooperation.⁶⁶ Most egregiously, the president sought to extort the leader of Ukraine—a country that has long struggled with entrenched corruption—into conducting a politicized investigation into former Vice President Joe Biden, in effect exporting his own corruption to a vulnerable geopolitical partner.⁶⁷ New revelations suggest that the president also appealed to Chinese President Xi for trade concessions to advance his personal political agenda.⁶⁸ All of this has occurred against the backdrop of the president’s unprecedented use of his official position to enrich himself, his family, and his friends.

To reverse this damage to the global fight against graft, the next administration will need to act decisively and innovatively to make anti-corruption a major foreign policy priority, one that draws on the full suite of U.S. capabilities—diplomacy, foreign assistance, financial regulation, intelligence, and law enforcement—in order to meet the myriad threats that corruption poses to U.S. interests at home and abroad.

- **Champion new anti-corruption legislation.** The United States should act forcefully to clean up its own act and ensure that American entities and assets do not become a sink for the proceeds of foreign corruption. To that end, the next administration should push new anti-corruption legislation that creates a federal beneficial ownership registry, requires more detailed reporting of cross-border transactions, extends the federal bribery statute to foreign officials who receive bribes from U.S. persons and firms, and closes gaps in the Bank Secrecy Act and related anti-money laundering legislation that exempt certain transactions, such as real estate, from scrutiny.⁶⁹

Importantly, the next administration should also strongly advocate for legislation to ban political spending by U.S. corporations that have an appreciable amount of foreign ownership and/or control, as detailed in a prior CAP publication.⁷⁰

- **Stand up an interagency task force on corruption.** The next administration should stand up an interagency task force on corruption within the first 100 days, co-led by the U.S. departments of State and Treasury, and task it to 1) assess how corruption by authoritarian competitors is being used to undermine U.S. interests and subvert democracy; and 2) develop a strategy to combat those activities. This global anti-corruption strategy should:
 - **Use U.S. financial power to promote global transparency.** Signal a more aggressive use of the “special measures” of Section 311 of the Patriot Act to target jurisdictions and entities that serve as major centers of illicit finance despite being formally compliant with global anti-money laundering standards⁷¹ and expand use of the Global Magnitsky Act to sanction corrupt actors in alignment with broader, strategic anti-corruption objectives.⁷²
 - **Create a rapid-response action fund for anti-corruption.** U.S. foreign assistance related to anti-corruption is both too small and too inflexible to meet the rapidly evolving threats that corruption poses to global peace and security. To that end, the next administration should work with Congress to create a rapid-response action fund to support overseas anti-corruption efforts, either by passing the Countering Russian and Other Overseas Kleptocracy (CROOK) Act currently before Congress or through stand-alone legislation.⁷³



QUICK WIN: Establish an anti-corruption coordinator at the State Department. This office could be modeled after the sanctions coordination office under the Obama administration, led by a senior ambassador-level coordinator. The office would be charged with coordinating and advancing U.S. anti-corruption policies as well as working with allies and partners around the world.

Conclusion

Living our democratic values at home and abroad is crucial to demonstrating movement toward a more progressive national security. In order to signal a meaningful shift in U.S. foreign policy, the next administration should use its first 100 days to restore human rights protections, rebuild democratic norms, and root out corruption.



New executive orders or policies recommended in the first 100 days:

- Issue a declaratory statement on foreign interference and outline consequences for it.
- Revise Section 212(f) of the Immigration and Nationality Act to prohibit discrimination in immigration and entry into the United States.
- Clarify the Siljander Amendment (1981) to narrowly interpret what qualifies as lobbying for or against abortion.
- Launch a Democratic Strategic Advantage Initiative to prioritize and organize U.S. foreign assistance to support democracies.



Executive orders or policies recommended for rescission or removal:

- **Executive Orders 13769 and 13780:** Impose illegal “Muslim travel ban” restrictions
- **Executive Order 13841:** Justifies the separation of families in immigration detention
- **Executive Order 13926:** Prioritizes religious freedom in diplomacy and foreign assistance programming
- **Executive Order 13928:** Imposes sanctions on the International Criminal Court
- **Global Gag Rule (also known as the Mexico City policy):** Restricts reproductive rights in U.S. foreign assistance

Endnotes

- 1 Alexandra Schmitt, "President Trump's Alarming Human Rights Agenda at Home and Abroad" (Washington: Center for American Progress, 2019), available at <https://www.americanprogress.org/issues/security/reports/2019/12/10/478458/president-trumps-alarming-human-rights-agenda-home-abroad/>.
- 2 Chris Cillizza and Brenna Williams, "15 times Donald Trump praised authoritarian rulers," CNN, July 2, 2019, available at <https://www.cnn.com/2019/07/02/politics/donald-trump-dictators-kim-jong-un-vladimir-putin/index.html>; Tal Axelrod, "Here are the US allies that have been caught in Trump's crosshairs," *The Hill*, August 24, 2019, available at <https://thehill.com/policy/international/458455-here-are-the-us-allies-that-have-been-in-trumps-crosshairs>.
- 3 Pete Cobus, "Trump Attacks on Press Effective, New Study Finds," *Voice of America*, April 17, 2020, available at <https://www.voanews.com/press-freedom/trump-attacks-press-effective-new-study-finds>.
- 4 Noah Bierman and Del Quentin Wilber, "Trump claims 'legal right' to intervene in Justice Department cases," *Los Angeles Times*, February 14, 2020, available at <https://www.latimes.com/politics/story/2020-02-14/trump-claims-legal-right-to-intervene-in-justice-department-cases>.
- 5 Reuters, "Trump Tweets Promo for His LA Golf Course as U.S. Death Toll Passed 80,000; Pence Not in Quarantine," *Haaretz*, May 12, 2020, available at <https://www.haaretz.com/science-and-health/trump-tweets-promo-for-his-la-golf-course-as-u-s-death-toll-passes-80-000-1.8837932>.
- 6 Jelani Cobb, "Voter-Suppression Tactics in the Age of Trump," *The New Yorker*, October 21, 2018, available at <https://www.newyorker.com/magazine/2018/10/29/voter-suppression-tactics-in-the-age-of-trump>.
- 7 Jordyn Phelps, "Trump defends 2017 'very fine people' comments, calls Robert E. Lee 'a great general,'" *ABC News*, April 26, 2019, available at <https://abcnews.go.com/Politics/trump-defends-2017-fine-people-comments-calls-robert/story?id=62653478>.
- 8 Michael Wines, "'Looting' Comment from Trump Dates Back to Racial Unrest of the 1960s," *The New York Times*, May 29, 2020, available at <https://www.nytimes.com/2020/05/29/us/looting-starts-shooting-starts.html>.
- 9 Martin Matishak and Andrew Desiderio, "Senate Intel report confirms Russia aimed to help Trump in 2016," *Politico*, April 21, 2020, available at <https://www.politico.com/news/2020/04/21/senate-intel-report-confirms-russia-aimed-to-help-trump-in-2016-198171>.
- 10 Kyle Cheney, Andrew Desiderio, John Bresnahan, "Trump acquitted on impeachment charges, ending gravest threat to his presidency," *Politico*, February 5, 2020, available at <https://www.politico.com/news/2020/02/05/trump-impeachment-vote-110805>.
- 11 Philip Rucker and Josh Dawsey, "'We fell in love': Trump and Kim shower praise, stroke egos on path to nuclear negotiations," *The Washington Post*, February 25, 2019, available at https://www.washingtonpost.com/politics/we-fell-in-love-trump-and-kim-shower-praise-stroke-egos-on-path-to-nuclear-negotiations/2019/02/24/46875188-3777-11e9-854a-7a14d7fec96a_story.html.
- 12 Chris Cillizza, "Donald Trump just can't stop saying nice things about Vladimir Putin," CNN, July 16, 2018, available at <https://www.cnn.com/2018/07/16/politics/donald-trump-vladimir-putin-summit/index.html>.
- 13 Jeff Mason and Roberta Rampton, "Trump praises Egypt's Sisi despite concerns about human rights, Russian arms," Reuters, April 9, 2019, available at <https://www.reuters.com/article/us-usa-egypt/trump-praises-egypts-sisi-despite-concerns-about-human-rights-russian-arms-idUSKCN1RL27S>.
- 14 David Shepardson, "Trump praises Chinese president extending tenure 'for life,'" Reuters, March 3, 2018, available at <https://www.reuters.com/article/us-trump-china/trump-praises-chinese-president-extending-tenure-for-life-idUSKCN1GG015>.
- 15 Colin Dwyer, "U.S. Announces Its Withdrawal From UN Human Rights Council," NPR, June 19, 2018, available at <https://www.npr.org/2018/06/19/621435225/u-s-announces-its-withdrawal-from-u-n-s-human-rights-council>.
- 16 Patrick Wintour, "Donald Trump pulls US out of UN global compact on migration," *The Guardian*, December 3, 2017, available at <https://www.theguardian.com/world/2017/dec/03/donald-trump-pulls-us-out-of-un-global-compact-on-migration>.
- 17 Jennifer Hansler, "Trump authorizes sanctions against International Criminal Court officials," CNN, June 14, 2020, available at <https://www.cnn.com/2020/06/11/politics/icc-executive-order/index.html>.
- 18 Associated Press and Bloomberg, "Stronger, unchallenged, emboldened: what to expect from Vladimir Putin after his crushing election win in Russia," *South China Morning Post*, March 19, 2018, available at <https://www.scmp.com/news/world/russia-central-asia/article/2137854/stronger-unchallenged-emboldened-what-expect-putin>.
- 19 Laura Rosenberger, "Authoritarian Advantage: How Authoritarian Regimes Upended Assumptions about Democratic Expansion," *The German Marshall Fund of the United States*, September 13, 2019, available at <https://www.gmfus.org/publications/authoritarian-advance-how-authoritarian-regimes-upended-assumptions-about-democratic>.
- 20 Sarah Repucci, "A Leaderless Struggle for Democracy" (Washington: Freedom House, 2020), available at <https://freedomhouse.org/report/freedom-world/2020/leaderless-struggle-democracy>.
- 21 Annabelle Timsit, "A Chinese propaganda video mocks America's response to the coronavirus crisis," Quartz, May 2, 2020, available at <https://qz.com/1850097/chinese-propaganda-video-mocks-us-response-to-coronavirus-crisis/>; Paul Mozur, "China Post-Coronavirus: Signs of Life, Censorship and Paranoia," *The New York Times*, April 16, 2020, available at <https://www.nytimes.com/2020/04/16/business/china-coronavirus-censorship.html>.
- 22 Deutsche Welle, "EU says China, Russia behind coronavirus 'disinformation campaigns,'" June 10, 2020, available at <https://www.dw.com/en/eu-says-china-russia-behind-coronavirus-disinformation-campaigns/a-53762806>.
- 23 International Center for Not-for-Profit Law, "COVID-19 Civic Freedom Tracker," available at <https://www.icnl.org/covid19tracker/> (last accessed September 2020).
- 24 Anna Purna Kambhampaty, "I Will Not Stand Silent: 10 Asian Americans Reflect on Racism During the Pandemic and the Need for Equality," *Time*, June 25, 2020, available at <https://time.com/5858649/racism-coronavirus/>.

- 25 Pete Dizikes, "Study: Democracy fosters economic growth," MIT News, March 7, 2019, available at <http://news.mit.edu/2019/study-democracy-fosters-economic-growth-acemoglu-0307>; Dan Reiter, "Democratic Peace Theory," Oxford Bibliographies, October 25, 2012, available at <https://www.oxfordbibliographies.com/view/document/obo-9780199756223/obo-9780199756223-0014.xml>.
- 26 Yascha Mounk and Roberto Stefan Foa, "This Is How Democracy Dies," *The Atlantic*, January 29, 2020, available at <https://www.theatlantic.com/ideas/archive/2020/01/confidence-democracy-lowest-point-record/605686/>.
- 27 CNN, "Protests across the globe after George Floyd's death," June 13, 2020, available at <https://www.cnn.com/2020/06/06/world/gallery/intl-george-floyd-protests/index.html>.
- 28 Osob Ahmed, "What the Domestic Gag Rule Means for Title X Providers," Center for American Progress, July 20, 2018, available at <https://www.americanprogress.org/issues/women/news/2018/07/20/453831/domestic-gag-rule-means-title-x-providers/>.
- 29 CAP Immigration Team, "Expansion of Trump's Illegal Muslim Ban Demonstrates Policy Guided by Personal Prejudice," Center for American Progress, January 31, 2020, available at <https://www.americanprogress.org/drumbats/expansion-trumps-illegal-muslim-ban-demonstrates-policy-guided-personal-prejudice/>; Executive Office of the President, "Executive Order 13769: Executive Order Protecting the Nation from Foreign Terrorist Entry into the United States," Press release, January 27, 2017, available at <https://www.whitehouse.gov/presidential-actions/executive-order-protecting-nation-foreign-terrorist-entry-united-states/>; Executive Office of the President, "Executive Order 13769: Protecting the Nation from Foreign Terrorist Entry Into the United States," *Federal Register* 82 (20) (2017): 8977–8982, available at <https://www.federalregister.gov/documents/2017/02/01/2017-02281/protecting-the-nation-from-foreign-terrorist-entry-into-the-united-states>.
- 30 Tom Jawetz, "Restoring the Rule of Law Through a Fair, Humane, and Workable Immigration System" (Washington: Center for American Progress, 2019), available at <https://www.americanprogress.org/issues/immigration/reports/2019/07/22/472378/restoring-rule-law-fair-humane-workable-immigration-system/>. Executive Office of the President, "Executive Order 13841: Affording Congress an Opportunity To Address Family Separation," *Federal Register* 83 (122) (2018): 29435–29436, available at <https://www.federalregister.gov/documents/2018/06/25/2018-13696/affording-congress-an-opportunity-to-address-family-separation>.
- 31 Sharita Gruberg, "Attack on the ACA: Undermining Protections for LGBTQ Patients and Language Accessibility Requirements" (Washington: Center for American Progress, 2019), available at <https://www.americanprogress.org/issues/lgbtq-rights/news/2019/07/19/472332/attack-on-the-aca/>. Other policies that should be reversed include the sustained attacks on Deferred Action for Childhood Arrivals (DACA) recipients and Temporary Protected Status (TPS) holders; the "deter by cruelty" policies in immigration detention centers; the ban on transgender Americans serving in the U.S. military; and the resumption of the federal death penalty.
- 32 Young Mie Kim, "New Evidence Shows How Russia's Election Interference Has Gotten More Brazen," Brennan Center for Justice, March 5, 2020, available at <https://www.brennan-center.org/our-work/analysis-opinion/new-evidence-shows-how-russias-election-interference-has-gotten-more>.
- 33 Michael Crowley, "Trump urges Russia to hack Clinton's email," *Politico*, July 27, 2016, available at <https://www.politico.com/story/2016/07/trump-putin-no-relationship-226282>.
- 34 Executive Office of the President, "Executive Order 13848: Imposing Certain Sanctions in the Event of Foreign Interference in a United States Election," *Federal Register* 83 (179) (2018): 46843–46848, available at <https://www.federalregister.gov/documents/2018/09/14/2018-20203/imposing-certain-sanctions-in-the-event-of-foreign-interference-in-a-united-states-election>.
- 35 Jordain Carney, "Senate GOP blocks three election security bills," *The Hill*, February 11, 2020, available at <https://thehill.com/homenews/house/482569-senate-gop-blocks-three-election-security-bills>.
- 36 U.S. Department of State, "Global Engagement Center," available at <https://www.state.gov/bureaus-offices/under-secretary-for-public-diplomacy-and-public-affairs/global-engagement-center/> (last accessed September 2020).
- 37 Margaret L. Taylor, "Combating disinformation and foreign interference in democracies: Lessons from Europe," Brookings Institution, July 31, 2019, available at <https://www.brookings.edu/blog/techtank/2019/07/31/combating-disinformation-and-foreign-interference-in-democracies-lessons-from-europe/>; Ashley Jeffrey and Scott Sargrad, "Strengthening Democracy With a Modern Civics Education" (Washington: Center for American Progress, 2019), available at <https://www.americanprogress.org/issues/education-k-12/reports/2019/12/14/478750/strengthening-democracy-modern-civics-education/>.
- 38 Cillizza and Williams, "15 times Donald Trump praised authoritarian rulers."
- 39 Alexandra Schmitt, "5 Questions About the Commission on Unalienable Rights," Center for American Progress, October 31, 2019, available at <https://www.americanprogress.org/issues/security/news/2019/10/31/476632/5-questions-commission-unalienable-rights/>.
- 40 Julie Hirschfield Davis and Michael D. Shear, "Trump Administration Considers a Drastic Cut in Refugees Allowed to Enter U.S.," *The New York Times*, September 6, 2019, available at <https://www.nytimes.com/2019/09/06/us/politics/trump-refugees-united-states.html>.
- 41 Gardiner Harris, "Trump Administration Withdraws U.S. from U.N. Human Rights Council," *The New York Times*, June 19, 2018, available at <https://www.nytimes.com/2018/06/19/us/politics/trump-israel-palestinians-human-rights.html>.
- 42 Jeff Mason, "Trump slashes foreign aid, cuts safety net programs in new budget proposal," Reuters, February 9, 2020, available at <https://www.reuters.com/article/us-usa-trump-budget/trump-slashes-foreign-aid-cuts-safety-net-programs-in-new-budget-proposal-idUSKBN2030PV>.
- 43 Kelly Magsamen and others, "Securing a Democratic World: The Case for a Democratic Values-Based U.S. Foreign Policy" (Washington: Center for American Progress, 2018), available at <https://www.americanprogress.org/issues/security/reports/2018/09/05/457451/securing-democratic-world/>.
- 44 UN LGBTI Core Group, available at <https://unlgbtcoregroup.org/>.
- 45 GOV.UK, "Equal Rights Coalition," available at <https://www.gov.uk/government/collections/equal-rights-coalition> (last accessed September 2020).
- 46 U.S. Department of State, "Draft Report of the Commission on Unalienable Rights" (Washington: 2020), available at <https://www.state.gov/draft-report-of-the-commission-on-unalienable-rights/>.
- 47 Federal Register, "Executive Order 13926: Advancing International Religious Freedom," *Federal Register* 85 (109) (2020): 34951–34953, available at <https://www.federalregister.gov/documents/2020/06/05/2020-12430/advancing-international-religious-freedom>.

- 48 U.N. Refugee Agency, "Global Trends: Forced Displacement in 2019," available at <https://www.unhcr.org/global-trends2019/> (last accessed September 2020).
- 49 Executive Office of the President, "Executive Order 13769: Executive Order Protecting the Nation from Foreign Terrorist Entry into the United States."
- 50 Executive Office of the President, "Presidential Proclamation Addressing Mass Migration Through the Southern Border of the United States," Press release, November 9, 2018, available at <https://www.whitehouse.gov/presidential-actions/presidential-proclamation-addressing-mass-migration-southern-border-united-states/>.
- 51 Executive Office of the President, "Proclamation Suspending Entry of Immigrants Who Present Risk to the U.S. Labor Market During the Economic Recovery Following the COVID-19 Outbreak," Press release, April 22, 2020, available at <https://www.whitehouse.gov/presidential-actions/proclamation-suspending-entry-immigrants-present-risk-u-s-labor-market-economic-recovery-following-covid-19-outbreak/>; Executive Office of the President, "Proclamation Suspending Entry of Aliens Who Present a Risk to the U.S. Labor Market Following the Coronavirus Outbreak," Press release, June 22, 2020, available at <https://www.whitehouse.gov/presidential-actions/proclamation-suspending-entry-aliens-present-risk-u-s-labor-market-following-coronavirus-outbreak/>.
- 52 Silva Mathema, "Refugees Thrive in America: Trump Cuts the Number of New Arrivals Despite Advancements and Success Stories" (Washington: Center for American Progress, 2018), available at <https://www.americanprogress.org/issues/immigration/reports/2018/11/19/461147/refugees-thrive-america/>.
- 53 Joshua Keating, "The Nonbinding Migration Pact That Was Too Much for Trump," *Slate*, December 7, 2018, available at <https://slate.com/news-and-politics/2018/12/global-compact-on-migration-u-s-and-several-european-countries-skip-out-on-migrant-pact.html>; Margaret Besheer, "UN States Adopt Global Compact on Refugees," *Voice of America*, December 17, 2018, available at <https://www.voanews.com/europe/un-states-adopt-global-compact-refugees>.
- 54 National Origin-Based Antidiscrimination for Nonimmigrants (NO BAN) Act, H.R. 2214, 116th Cong., 2nd sess. (March 5, 2020), available at <https://www.congress.gov/bill/116th-congress/house-bill/2214?q=%7B%22search%22%3A%5B%22National+Origin+Based+Antidiscrimination+for+Nonimmigrants%22%5D%7D&r=1&s=1>.
- 55 Open Society Foundations, "What Is the Global Gag Rule?," available at <https://www.opensocietyfoundations.org/explainers/what-global-gag-rule> (last accessed September 2020).
- 56 Luisa Blanchfield, "Abortion and Family Planning-Related Provisions in U.S. Foreign Assistance Law and Policy" (Washington: Congressional Research Service, 2020), available at <https://fas.org/sgp/crs/row/R41360.pdf>.
- 57 Sarah E. Mendelson, "Why Governments Target Civil Society and What Can Be Done in Response: A New Agenda" (Washington: Center for Strategic and International Studies, 2015), available at https://www.ohchr.org/Documents/AboutUs/CivilSociety/ReportHC/67_CSIS-MendelsonGov-TargetCivilSocietyNewAgenda-2.pdf.
- 58 Hansler, "Trump authorizes sanctions against International Criminal Court officials."
- 59 Executive Office of the President, "Executive Order 13928: Executive Order on Blocking Property Of Certain Persons Associated With The International Criminal Court," Press release, June 11, 2020, available at <https://www.whitehouse.gov/presidential-actions/executive-order-blocking-property-certain-persons-associated-international-criminal-court/>.
- 60 Axelrod, "Here are the US allies that have been caught in Trump's crosshairs."
- 61 Zachary B. Wolf and JoElla Carman, "Here are all the treaties and agreements Trump has abandoned," *CNN*, February 1, 2019, available at <https://www.cnn.com/2019/02/01/politics/nuclear-treaty-trump/index.html>.
- 62 Community of Democracies, "Home," available at <https://community-democracies.org/> (last accessed September 2020).
- 63 Trevor Sutton and Alexandra Schmitt, "Donald Trump's Gift to Kleptocrats" (Washington: Center for American Progress, 2019), available at <https://www.americanprogress.org/issues/security/reports/2019/10/21/476140/donald-trumps-gift-kleptocrats/>.
- 64 Devan Cole, "Washington Post: Trump administration has tried to cut billions in foreign aid to fight corruption despite calling it a priority," *CNN*, December 25, 2019, available at <https://www.cnn.com/2019/10/23/politics/trump-administration-cutting-anti-corruption-ukraine/index.html>.
- 65 Jenna Smialek, "Trump Tried to Kill Anti-Bribery Rule He Deemed 'Unfair,' New Book Alleges," *The New York Times*, January 15, 2020, available at <https://www.nytimes.com/2020/01/15/business/economy/trump-bribery-law.html>.
- 66 Mary Beth Sheridan, "How U.S. apathy helped kill a pioneering anti-corruption campaign in Guatemala," *The Washington Post*, June 14, 2019, available at https://www.washingtonpost.com/world/the_americas/how-us-apaty-helped-kill-a-pioneering-anticorruption-campaign-in-guatemala/2019/06/14/cc4f464a-1e5e-11e9-a759-2b8541bbbe20_story.html; Peter J. Meyer, "Corruption in Honduras: End of the Mission to Support the Fight Against Corruption and Impunity in Honduras (MACCIH)" (Washington: Congressional Research Service, 2020), available at <https://www.everycrsreport.com/reports/IN11211.html>.
- 67 Zachary B. Wolf and Sean O'Key, "The Trump-Ukraine impeachment inquiry report, annotated," *CNN*, December 3, 2019, available at <https://www.cnn.com/interactive/2019/12/politics/trump-ukraine-impeachment-inquiry-report-annotated/>.
- 68 John Bolton, "The Scandal of Trump's China Policy," *The Wall Street Journal*, June 17, 2020, available at <https://www.wsj.com/articles/john-bolton-the-scandal-of-trumps-china-policy-11592419564>.
- 69 Office of the Comptroller of the Currency, "Bank Secrecy Act (BSA)," available at <https://www.occ.treas.gov/topics/supervision-and-examination/bsa/index-bsa.html> (last accessed September 2020).
- 70 Michael Sozan, "Ending Foreign-Influenced Corporate Spending in U.S. Elections" (Washington: Center for American Progress, 2019), available at <https://www.americanprogress.org/issues/democracy/reports/2019/11/21/477466/ending-foreign-influenced-corporate-spending-u-s-elections/>.
- 71 Financial Crimes Enforcement Network, "USA PATRIOT Act," available at <https://www.fincen.gov/resources/statutes-regulations/usa-patriot-act> (last accessed September 2020).
- 72 U.S. Department of State, "Global Magnitsky Act," available at <https://www.state.gov/global-magnitsky-act/> (last accessed September 2020).
- 73 Countering Russian and Other Overseas Kleptocracy (CROOK) Act, H.R. 3843, 116th Cong., 1st sess. (July 18, 2019), available at <https://www.congress.gov/bill/116th-congress/house-bill/3843/text>.