

United States participated actively in the negotiation of the ATT,²⁷ signed the treaty following its adoption in 2013, and sent it to the Senate for advice and consent to ratification.²⁸ But in 2019 the Trump administration notified the United Nations, the treaty's depositary, that the United States "does not intend to become a party to the treaty . . . [and therefore] the United States has no legal obligations arising from its signature."²⁹ At the seventh conference of states parties to the ATT in August 2021, under the Biden administration, the United States stated that, following the adoption of a new conventional arms transfer policy, which was then being drafted, "the United States will . . . use that policy framework to review specific arms transfer issues, including determining the proper relationship of the United States to the Arms Trade Treaty."³⁰ Though the CAT Policy has now been issued, no announcement has been made to date regarding a change in the U.S. position concerning the ATT, including whether to seek the advice and consent of the Senate, where it is still pending.³¹ In March 2023, Deputy Assistant Secretary Resnick said that the administration is "reviewing the implications of decisions taken to date on the ATT to determine the proper position of the United States with respect to the treaty."³²

INTERNATIONAL HUMAN RIGHTS AND HUMANITARIAN LAW

President Biden Issues Policy on Promoting Accountability for Conflict-Related Sexual Violence
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On November 28, 2022, President Joseph R. Biden, Jr. issued a memorandum on promoting accountability for conflict-related sexual violence (CRSV).¹ It states that the United States "does not accept CRSV as an inevitable cost of armed conflict" and emphasizes its "commit[ment] to supporting survivors . . . by invoking all tools available, including legal, policy, diplomatic, and financial tools, to deter such violence, break the vicious cycle of impunity, and provide the necessary services to survivors."² Though focusing on impunity and

²⁷ See CARRIELYN D. GUYMON, DIGEST OF UNITED STATES PRACTICE IN INTERNATIONAL LAW 674–79 (2012), at <https://2009-2017.state.gov/documents/organization/211955.pdf>.

²⁸ Depositary Notification from the UN Secretary-General, UN Doc. C.N.654.2013.TREATIES-XXVI.8 (Sept. 25, 2013), at <https://treaties.un.org/doc/Publication/CN/2013/CN.654.2013-Eng.pdf> [<https://perma.cc/68B4-G3DF>]; see CARRIELYN D. GUYMON, DIGEST OF UNITED STATES PRACTICE IN INTERNATIONAL LAW 710–15 (2013), at <https://2009-2017.state.gov/documents/organization/226409.pdf>.

²⁹ Depositary Notification from the UN Secretary-General, UN Doc. C.N.314.2019.TREATIES-XXVI.8 (July 19, 2019), at <https://treaties.un.org/doc/Publication/CN/2019/CN.314.2019-Eng.pdf> [<https://perma.cc/H9PQ-NWZ8>]; see Jean Galbraith, Contemporary Practice of the United States, 113 AJIL 812, 813 (2019).

³⁰ Statement by the United States of America (Aug. 31, 2021), at <https://thearmstradetreaty.org/hyper-images/file/USA%20-%20Treaty%20Universalization%20CSP7%20%28for%20posting%29/USA%20-%20Treaty%20Universalization%20CSP7%20%28for%20posting%29.pdf> [<https://perma.cc/92PK-3TWW>]; ATT Seventh Conference of States Parties (CSP7), Day 2, as Delivered, 1:28:25 (Aug. 31, 2021), at <https://www.youtube.com/watch?v=21dNMNyDCSI>.

³¹ President Trump had requested the treaty's return, but the Senate did not comply.

³² CAT Policy Discussion, *supra* note 22, at 1:15:25.

¹ See White House Press Release, Memorandum on Promoting Accountability for Conflict-Related Sexual Violence (Nov. 28, 2022), at <https://www.whitehouse.gov/briefing-room/presidential-actions/2022/11/28/memorandum-on-promoting-accountability-for-conflict-related-sexual-violence> [<https://perma.cc/T38Z-7TPV>] [hereinafter Presidential Memorandum].

² *Id.*, Sec. 1.

accountability, the policy also seeks to “complement a broader, holistic approach to preventing and responding [to CRSV] . . . [that] includes advancing gender equity and equality; prioritizing the immediate needs of survivors; and amplifying survivor voices in transitional justice, the provision of services, and peace and political processes.”³ Issuance of the memorandum was timed to coincide with the Preventing Sexual Violence in Conflict Initiative (PSVI) conference in London, where the United States joined fifty-three other countries in supporting the conference’s political declaration on conflict-related sexual violence and, together with forty other states, made national commitments to preventing CRSV.⁴ While states and international organizations have begun to devote greater attention to preventing and punishing CRSV, survivors and advocates argue, and diplomats and UN officials recognize, that “sexual violence continues to occur in many conflicts across the world, with almost total impunity.”⁵

The memorandum defines CRSV as “incidents or patterns of sexual violence that occur in conflict or post-conflict situations with a direct or indirect link to conflict.”⁶ It notes that “CRSV may include rape, sexual slavery, sex trafficking, forced pregnancy, forced sterilization, and any other form of sexual violence of comparable gravity, against individuals of all gender identities.”⁷ While men and boys are at risk,⁸ women and girls—97 percent in a recent UN report—are predominately the victims.⁹ CRSV is often underreported, and practitioners

³ *Id.*

⁴ See UK Foreign, Commonwealth and Development Office Press Release, Preventing Sexual Violence in Conflict Initiative (PSVI) Conference 2022: A Political Declaration on Conflict-Related Sexual Violence (Dec. 16, 2022), at <https://www.gov.uk/government/publications/conflict-related-sexual-violence-political-declaration-at-the-2022-preventing-sexual-violence-in-conflict-initiative-conference/preventing-sexual-violence-in-conflict-initiative-psvi-conference-2022-a-political-declaration-on-conflict-related-sexual-violence> [<https://perma.cc/6LQK-FQMH>] [hereinafter Political Declaration]; UK Foreign, Commonwealth and Development Office Press Release, International Ministerial Conference on Preventing Sexual Violence in Conflict Initiative 2022: National Commitments (Dec. 16, 2022), at <https://www.gov.uk/government/publications/conflict-related-sexual-violence-political-declaration-at-the-2022-preventing-sexual-violence-in-conflict-initiative-conference/international-ministerial-conference-on-preventing-sexual-violence-in-conflict-initiative-2022-national-commitments> [<https://perma.cc/VH5P-MYTL>].

⁵ See Letter Dated 5 April 2022 from the Permanent Representative of the United Kingdom of Great Britain and Northern Ireland to the United Nations Addressed to the Secretary-General, para. 1, UN Doc. S/2022/293; Conflict-Related Sexual Violence: Report of the Secretary-General, para. 16, UN Doc. S/2021/312 (Mar. 30, 2021); Angelina Jolie, *Action Is Needed Right Now to End Sexual Violence in Conflict*, *GUARDIAN* (Nov. 28, 2022), at <https://www.theguardian.com/global-development/commentisfree/2022/nov/28/jolie-sexual-violence-in-conflict-london-summit>.

⁶ Presidential Memorandum, *supra* note 1, Sec. 5. The UN special representative on sexual violence in conflict defines CRSV as “rape, sexual slavery, forced prostitution, forced pregnancy, forced abortion, enforced sterilization, forced marriage, trafficking in persons when committed in situations of conflict for the purpose of sexual violence/exploitation and any other form of sexual violence of comparable gravity perpetrated against women, men, girls or boys that is directly or indirectly linked to a conflict.” Office of the UN Special Representative of the Secretary-General on Sexual Violence in Conflict, *Our Mandate*, at <https://www.un.org/sexualviolenceinconflict/our-work/our-mandate> [<https://perma.cc/K2EV-PLDN>].

⁷ Presidential Memorandum, *supra* note 1, Sec. 5. The memorandum also states that “[d]epending on the circumstances, acts of CRSV can constitute war crimes, crimes against humanity, or acts of genocide, and therefore may constitute crimes that are punishable under international law.” *Id.*

⁸ See International Committee of the Red Cross, “That Never Happens Here”: Sexual and Gender-Based Violence Against Men, Boys and/Including LGBTIQ+ Persons in Humanitarian Settings (2022), at https://www.icrc.org/en/download/file/229528/that_never_happens_here_report_-_sexual_violence.pdf [<https://perma.cc/K2SK-5E4F>].

⁹ See Policy – United Nations Field Missions: Preventing and Responding to Conflict-Related Sexual Violence, para. 12 (Jan. 2020), at <https://www.un.org/sexualviolenceinconflict/wp-content/uploads/2020/02/DPO-DPPA-SRSG-SVC-OHCHR-Policy-on-Field-Missions-Preventing-and-Responding-to-CRSV-2020.pdf>

estimate that between ten and twenty conflict-related rapes go undocumented for every one reported.¹⁰ CRSV is used as a tactic of war and terrorism.¹¹ Victims are often “selective[ly] target[ed] . . . from opposing ethnic, religious or political groups, such as the . . . Yazidi community by the Islamic State of Iraq and the Levant (ISIL) or . . . women and girls by Boko Haram.”¹² “Sexual violence is no longer treated as merely a byproduct of insecurity,” Pramila Patten, the UN special representative on sexual violence in conflict has concluded, “but rather as a significant form of insecurity in itself.”¹³

Diplomatic efforts to combat CRSV began in earnest only within the past twenty years. The first major international conference addressing CRSV convened in 2006 and issued the Brussels Call to Action to Address Sexual Violence in Conflict and Beyond.¹⁴ Since then, the United Kingdom and the United Nations have led initiatives to highlight awareness of CRSV and spur action domestically and internationally. In 2008, the UN Security Council adopted Resolution 1820, the first that focused on CRSV. The resolution “[s]tresse[d] that sexual violence, when used or commissioned as a tactic of war in order to deliberately target civilians or as a part of a widespread or systematic attack against civilian populations, can significantly exacerbate situations of armed conflict and may impede the restoration of international peace and security.”¹⁵ The Council also “[d]emand[ed] the immediate and complete cessation by all parties to armed conflict of all acts of sexual violence against civilians with immediate effect,” “[d]emand[ed] that all parties to armed conflict immediately take appropriate measures to protect civilians, including women and girls, from all forms of sexual violence,” and “[n]ote[d] that rape and other forms of sexual violence can constitute a war crime, a crime against humanity, or a constitutive act with respect to genocide, . . . call[ed] upon Member States to comply with their obligations for prosecuting persons responsible for such acts, . . . and stresse[d] the importance of ending impunity.”¹⁶ In 2009, the UN secretary-general, at the request of the Council, established the Office of the Special Representative.¹⁷ The special representative speaks out and advocates on CRSV, prepares the secretary-general’s Annual Report on Conflict-Related Sexual Violence, chairs the UN Action Against Sexual Violence in Conflict (currently a network of twenty-four UN entities), and works with a

[<https://perma.cc/K7LS-JW48>]; UN Doc. S/PV.9016, at 4 (Apr. 13, 2022) [hereinafter Security Council Verbatim Record].

¹⁰ See UN Press Release, Remarks of SRSG Patten at UNGA 76 Side-Event “Preventing & Addressing CRSV as a Tool of War” (Sept. 29, 2021), at <https://www.un.org/sexualviolenceinconflict/statement/remarks-of-srsg-patten-at-unga76-side-event-preventing-addressing-crsv-as-a-tool-of-war-co-hosted-by-the-office-for-global-womens-issues-us-department-of-state-search-f> [<https://perma.cc/Y9RR-TVT6>].

¹¹ See, e.g., Conflict-Related Sexual Violence: Report of the Secretary-General, para. 10, UN Doc. S/2022/272 (Mar. 29, 2022).

¹² UN Office of the Special Representative of the Secretary-General on Sexual Violence in Conflict, Current Trends and Emerging Concerns, at <https://www.un.org/sexualviolenceinconflict/current-trends-and-emerging-concerns> [<https://perma.cc/U5CC-UE2P>] [hereinafter Current Trends].

¹³ *Id.*

¹⁴ See United Nations Population Fund Press Release, First International Symposium on Sexual Violence and Beyond Opens Today in Brussels (June 21, 2006), at <https://www.unfpa.org/press/first-international-symposium-sexual-violence-conflict-and-beyond-opens-today-brussels> [<https://perma.cc/BH3U-DB55>]; Report on the International Symposium on Sexual Violence in Conflict and Beyond 1 (June 2006), at https://documentation.lastradainternational.org/lisdocs/unfpa_report_sexual_violence_070402.pdf [<https://perma.cc/JL9M-XE38>].

¹⁵ SC Res. 1820, para. 1 (2008).

¹⁶ *Id.*, paras. 2–4.

¹⁷ SC Res. 1888, para. 4 (2009).

Team of Experts on the Rule of Law and Sexual Violence in Conflict to support investigations and prosecutions, legislative reform, and the protection of victims and witnesses.¹⁸ In its resolutions, the Security Council has continued to emphasize the importance of preventing and responding to CRSV and has encouraged strengthening accountability mechanisms, including urging its sanctions committees “to apply targeted sanctions against those who perpetrate and direct sexual violence in conflict.”¹⁹ The resolutions, together with international humanitarian law and international human rights, establish a framework of state obligations concerning CRSV.²⁰

Outside the United Nations, the United Kingdom, through the PSVI, has taken the lead among states in coordinating cross-governmental action. That project generated the 2013 Declaration of Commitment to End Sexual Violence in Conflict (now endorsed by 156 states),²¹ and convened the first Global Summit to End Sexual Violence in Conflict the following year.²² At the PSVI conference in November 2022, over fifty countries, including the United States, endorsed the Political Declaration on Conflict-Related Sexual Violence.²³ The declaration included commitments “[t]o prevent conflict-related sexual violence from occurring,” “[t]o strengthen justice for all those affected by conflict-related sexual violence and hold perpetrators to account, including as a means of prevention,” and “[t]o make available and co-create holistic and meaningful support to victims and survivors.”²⁴ In March 2023, the United Kingdom launched the International Alliance on Preventing Sexual Violence in Conflict—composed of states (including the United States), international organizations, and non-governmental organizations—to coordinate global action on CRSV.²⁵ Despite these efforts, according to UN Special Representative Patten, “[i]mpunity for

¹⁸ See UN Office of the Special Representative of the Secretary-General on Sexual Violence in Conflict, About the Office, at <https://www.un.org/sexualviolenceinconflict/about-us/about-the-office> [<https://perma.cc/265U-AYMM>]; UN Office of the Special Representative of the Secretary-General on Sexual Violence in Conflict, UN Action Against Sexual Violence in Conflict, at <https://www.un.org/sexualviolenceinconflict/about-us/un-action> [<https://perma.cc/M4TB-EAAY>].

¹⁹ SC Res. 2467, para. 10 (2019).

²⁰ See GUIDEBOOK ON STATE OBLIGATIONS FOR CONFLICT-RELATED SEXUAL VIOLENCE, at <https://red-line-guidebook.netlify.app>.

²¹ See A Declaration of Commitment to End Sexual Violence in Conflict (Sept. 24, 2013), at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/274724/A_DECLARATION_OF_COMMITMENT_TO_END_SEXUAL_VIOLENCE_IN_CONFLICT.pdf [<https://perma.cc/YUJ3-7TJ2>]; UK Foreign, Commonwealth and Development Office, Preventing Sexual Violence in Conflict Initiative Strategy 10 (Nov. 2022), at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1120399/preventing-sexual-violence-in-conflict-initiative-strategy.pdf [<https://perma.cc/EW4H-DLJT>].

²² See UK Foreign, Commonwealth and Development Office Press Release, 2014 Global Summit to End Sexual Violence in Conflict, at <https://www.gov.uk/government/collections/2014-global-summit-to-end-sexual-violence-in-conflict> [<https://perma.cc/E4FB-GM5J>].

²³ Political Declaration, *supra* note 4.

²⁴ *Id.*, paras. 2–4.

²⁵ See UN Doc. S/PV.9276, at 17 (Mar. 7, 2023) (statement of Lord Ahmad); Lord (Tariq) Ahmad of Wimbledon (@tariqahmadbt), TWITTER (Mar. 8, 2023, 6:47 p.m.), at <https://twitter.com/tariqahmadbt/status/1633615356022472707> [<https://perma.cc/URQ9-QA7B>]; Government of Ukraine Press Release, Ukraine to Co-chair the Newly Created Preventing Sexual Violence in Conflict International Alliance (Mar. 11, 2023), at <https://www.kmu.gov.ua/en/news/ukraina-spivholovuvatyme-u-novostvorenomu-hlobalnomu-aliansi-z-poperedzhennia-seksualnoho-nasylstva-pid-chas-viiny> [<https://perma.cc/A56J-AZY9>]; Lord (Tariq) Ahmad of Wimbledon (@tariqahmadbt), TWITTER (Apr. 27, 2023, 12:52 p.m.), at <https://twitter.com/tariqahmadbt/status/1651630394528210953> [<https://perma.cc/9LLD-7RMH>].

wartime rape remains the rule and accountability the rare exception.”²⁶ “It is time to move from visibility to accountability,” she told the Security Council in April 2022.²⁷ “It is time now to make accountability inevitable.”²⁸

Focusing on accountability, the Biden memorandum seeks to ensure that executive branch agencies use their authorities “in a manner that responds to the full scale of [the] problem.”²⁹ To that end, the memorandum states that it is U.S. policy to

fully exercise existing authorities to impose economic sanctions and implement visa restrictions in order to promote justice and accountability for acts of CRSV; devote the necessary resources to ensure regular coordination and reporting on CRSV incidents and to conduct training on CRSV issues more broadly, including to support the designation of sanctions targets; strengthen the implementation of other existing tools and authorities to promote accountability for CRSV, including the provision of United States security assistance; and broaden engagement with foreign partner governments to encourage the establishment and use of their own tools to promote justice and accountability.³⁰

In addition to domestic actions, the memorandum specifies the importance of bilateral and multilateral engagement “to broaden the number of countries willing to support accountability for acts of CRSV and to strengthen policies and locally-driven programming in multilateral institutions, including efforts to address the immediate and long-term needs of survivors.”³¹

In particular, the memorandum stresses and expounds upon the use of sanctions. It makes clear, for example, that “an act of CRSV” may “constitute a ‘serious human rights abuse’ for purposes of designation” under the Global Magnitsky Human Rights Accountability Act.³² And it clarifies that the “criteria for targeting certain abuses or violations of human rights” in country-specific sanctions programs “may include CRSV.”³³ Existing sanctions, the memorandum emphasizes, should be “used to the fullest extent possible to target perpetrators of acts of CRSV and their enablers.”³⁴ But other measures “to prevent and respond to CRSV and promote accountability for perpetrators” are highlighted too, including rules regarding security assistance, such as the Leahy Laws.³⁵

The memorandum reflects a broader U.S. commitment preventing and responding to conflict-related sexual violence through financial support, programming, and policy. At the PSVI conference, the United States committed \$10 million over two years to “support civil society organisations to document sexual violence in conflict in line with the Murad Code,” the Global Code of Conduct for Gathering and Using Information about Systematic and

²⁶ Current Trends, *supra* note 12.

²⁷ Security Council Verbatim Record, *supra* note 9, at 4.

²⁸ *Id.*

²⁹ Presidential Memorandum, *supra* note 1, Sec. 1.

³⁰ *Id.*, Sec. 1.

³¹ *Id.*, Sec. 4.

³² *Id.*, Sec. 2; Exec. Order 13,818, 82 Fed. Reg. 60,839 (Dec. 20, 2017).

³³ Presidential Memorandum, *supra* note 1, Sec. 2.

³⁴ *Id.*

³⁵ *Id.*, Sec. 3; 22 U.S.C. § 2378d; 10 U.S.C. § 362.

Conflict-Related Sexual Violence.³⁶ The United States has also committed \$2 million for “survivor-centered, trauma-informed approaches to fostering survivor resilience during and after conflict” and an additional \$400,000 to the United States’s already \$1.75 million annual contribution to the Office of the UN Special Representative to the Secretary-General on Sexual Violence in Conflict.³⁷ On December 6, 2022, the United States announced “Safe from the Start ReVisioned,” an initiative focusing on “improving and expanding protection services for women and girls from the onset of every conflict or disaster.”³⁸ Updating “Safe from the Start,” which was launched in 2013, “Safe from the Start ReVisioned” “recommits [the United States] to leading the global community in responding to the needs of women and girls, in all their diversity, from the very start of every conflict or disaster.”³⁹ Also that December, the Department of State issued an updated Strategy to Prevent and Respond to Gender-Based Violence Globally. The Strategy includes among its action items the “consider[ation] and incorporat[ion] [of] gender-based violence risks, prevention, and response [into] U.S. national security and human rights efforts to promote peace, security, and democracy around the world.”⁴⁰ In line with the presidential memorandum, the Strategy, seeks to promote accountability for CRSV.⁴¹

On January 26, 2023, the U.S. Department of the Treasury’s Office of Foreign Assets Control (OFAC) designated the Wagner Group, under Executive Order 13,667, “for being responsible for or complicit in, or having engaged in, the targeting of women, children, or any civilians . . . through conduct that would constitute a serious abuse or violation of human rights or a violation of international humanitarian law in relation to the [Central African Republic].”⁴² The Department of State indicated that these designations were to “advance President Biden’s plan to promote accountability for conflict-related sexual violence, which calls for federal agencies to leverage existing sanctions authorities to pursue its perpetrators.”⁴³ On June 20, 2023, OFAC and the State Department designated a total of four

³⁶ UK Foreign, Commonwealth & Development Office Press Release, Countries Agree to Concrete Change to End Sexual Violence in Conflict (Nov. 29, 2022), at <https://www.gov.uk/government/news/countries-agree-concrete-change-to-end-sexual-violence-in-conflict> [<https://perma.cc/7HMU-YDZB>]; U.S. Dep’t of State Press Release, Highlighting the U.S. Government’s Commitment to Preventing and Responding to Conflict-Related Sexual Violence (Nov. 30, 2022), at <https://www.state.gov/highlighting-the-u-s-governments-commitment-to-preventing-and-responding-to-conflict-related-sexual-violence> [<https://perma.cc/5C7C-46LC>] [hereinafter U.S. Dep’t of State Press Release]; Murad Code Project, Murad Code (2022), at <https://www.muradcode.com> [<https://perma.cc/Z8LC-VU56>].

³⁷ U.S. Dep’t of State Press Release, *supra* note 36.

³⁸ U.S. Dep’t of State Press Release, The United States Announces Safe from the Start ReVisioned Initiative to Strengthen Efforts to Prevent and Respond to Gender-Based Violence in Emergencies (Dec. 6, 2022), at <https://www.state.gov/the-united-states-announces-safe-from-the-start-revisioned-initiative-to-strengthen-efforts-to-prevent-and-respond-to-gender-based-violence-in-emergencies> [<https://perma.cc/82PC-8ZCF>].

³⁹ *Id.*

⁴⁰ United States Strategy to Prevent and Respond to Gender-Based Violence Globally: 2022 Update, at 27 (Dec. 2022), at https://www.state.gov/wp-content/uploads/2022/12/GBV-Global-Strategy-Report_v6-Accessible-1292022.pdf [<https://perma.cc/DTQ6-UDUJ>].

⁴¹ *See id.* at 33.

⁴² U.S. Dep’t of the Treasury Press Release, Treasury Sanctions Russian Proxy Wagner Group as a Transnational Criminal Organization (Jan. 26, 2023), at <https://home.treasury.gov/news/press-releases/jy1220> [<https://perma.cc/6PJT-6ZMZ>].

⁴³ U.S. Dep’t of State Press Release, Countering the Wagner Group and Degrading Russia’s War Efforts in Ukraine (Jan. 26, 2023), at <https://www.state.gov/countering-the-wagner-group-and-degrading-russias-war-efforts-in-ukraine> [<https://perma.cc/4E9E-D29V>].

individuals for involvement in CRSV.⁴⁴ In a statement, President Biden noted that this marked “the first time that a dedicated focus on conflict-related sexual violence has led to the imposition of U.S. sanctions.”⁴⁵

INTERNATIONAL CRIMINAL LAW

The United States Arrests and Charges Eleven in Connection with the Assassination of Haiti’s President

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U.S. federal law enforcement has charged eleven men in connection with the July 7, 2021, assassination of Haitian President Jovenel Moïse at his home in Port-au-Prince.¹ Arrested between January 2022 and February 2023, the men include Colombian, Haitian, U.S., dual Haitian-Chilean, and dual U.S.-Haitian nationals. According to prosecutors, the accused hatched, developed, and advanced the plan while operating in the United States.

⁴⁴ See U.S. Dep’t of the Treasury Press Release, Treasury Sanctions Two South Sudanese Officials Responsible for Conflict-Related Sexual Violence (June 20, 2023), at <https://home.treasury.gov/news/press-releases/jy1552> [<https://perma.cc/62L7-ACWY>] [hereinafter Treasury Sanctions Two South Sudanese Officials]; U.S. Dep’t of State Press Release, Designating and Promoting Accountability for Conflict-Related Sexual Violence (June 20, 2023), at <https://www.state.gov/designating-and-promoting-accountability-for-conflict-related-sexual-violence> [<https://perma.cc/9M7A-YURC>].

⁴⁵ White House Press Release, Statement from President Joe Biden on New Steps Against Perpetrators of Sexual Violence in Conflict (June 20, 2023), at <https://www.whitehouse.gov/briefing-room/statements-releases/2023/06/20/statement-from-president-joe-biden-on-new-steps-against-perpetrators-of-sexual-violence-in-conflict> [<https://perma.cc/2CKX-T8F9>].

¹ U.S. Dep’t of Justice Press Release, Four Florida Men Arrested in Plot to Kill Haitian President, Grand Jury Returns Indictment Against 11 (Feb. 14, 2023), at <https://www.justice.gov/opa/pr/four-florida-men-arrested-plot-kill-haitian-president-grand-jury-returns-indictment-against> [<https://perma.cc/KYU5-4HTC>] [hereinafter Four Florida Men Arrested]. The narrative in this and the following paragraphs is based on government allegations and news stories. See Third Superseding Indictment, Case No. 22-20104-CR, United States v. Ortiz et al. (SD Fl. Feb. 14, 2023) [hereinafter Third Superseding Indictment]; Criminal Complaint, Case No. 1:23-mj-02256, United States v. Ortiz, Intriago, and Veintemilla (SD Fl. Feb. 13, 2023) [hereinafter Criminal Complaint]; Criminal Complaint, Case No. 22-mj-02251, United States v. John (SD Fl. Feb. 23, 2023); Criminal Complaint, Case No. 23-mj-02178, United States v. Solages, Vincent, and Garcia (SD Fl. Jan. 31, 2023); Criminal Complaint, Case No. 22-mj-04161, United States v. Sanon (SD Fl. Dec. 20, 2022); Criminal Complaint, Case No. 23-mj-02257, United States v. Bergmann (SD Fl. Feb. 13, 2023); Criminal Complaint, Case No. 21-mj-04265, United States v. Palacios Palacios (SD Fl. Nov. 24, 2021); Criminal Complaint, Case No. 22-mj-02070, United States v. Jaar (SD Fl. Jan. 19, 2022); Four Florida Men Arrested, *supra*; U.S. Dep’t of Justice Press Release, Additional Four Charged in Connection with Plot to Kill Haitian President (Jan. 31, 2023), at <https://www.justice.gov/opa/pr/additional-four-charged-connection-plot-kill-haitian-president> [<https://perma.cc/T8SW-63LB>] [hereinafter Additional Four Charged]; U.S. Dep’t of Justice Press Release, Third Man Charged in Connection with Plot to Kill Haitian President (May 9, 2022), at <https://www.justice.gov/opa/pr/third-man-charged-connection-plot-kill-haitian-president> [<https://perma.cc/2WXA-JU56>]; U.S. Dep’t of Justice Press Release, Second Man Charged in Connection with Plot to Kill Haitian President (Jan. 20, 2022), at <https://www.justice.gov/opa/pr/second-man-charged-connection-plot-kill-haitian-president> [<https://perma.cc/69P4-T73A>]; U.S. Dep’t of Justice Press Release, Colombian National Charged in Connection with Plot to Kill Haitian President (Jan. 4, 2022), at <https://www.justice.gov/opa/pr/colombian-national-charged-connection-plot-kill-haitian-president> [<https://perma.cc/D3BA-FJQ4>]; Jacqueline Charles, *Made in Miami: How a South Florida Plot to Oust Haiti’s Jovenel Moïse Led to His Murder*, MIAMI HERALD (Dec. 8, 2022), at <https://www.miamiherald.com/news/nation-world/world/americas/haiti/article264470076.html>.