

MAXIMUM PRESSURE 2.0: HOW TO IMPROVE SANCTIONS ON NORTH KOREA

BY ANTHONY RUGGIERO

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President Donald Trump cancelled his June 12 summit with Kim Jong Un after North Korea displayed “tremendous anger and open hostility,” as Trump put it in his letter to Kim.¹ The president’s cancellation was not definitive, as preparations continued with Secretary of State Mike Pompeo meeting a senior North Korean official in New York last week.² Pyongyang’s diplomatic games are likely part of Kim’s attempt to undermine the Trump administration’s maximum pressure policy. If the White House concludes that Kim has not made a strategic decision to denuclearize, the U.S. should initiate the second, tougher phase of the maximum pressure campaign. The U.S. should expect Kim and his patrons to do everything they can to undermine the sanctions regime, yet sanctions are ultimately the only non-military leverage Washington has to solve this crisis.

A robust sanctions regime requires constant maintenance to sustain pressure on its target, especially a target like North Korea that is expert in finding loopholes. During the first phase of the maximum pressure campaign, China increased implementation of sanctions thanks to the Trump administration’s focus on the issue and perhaps a fear that the crisis could spiral into a military conflict.³ Beijing’s response represents a success story for the maximum pressure campaign, but also a vulnerability, since Chinese leaders could provide Pyongyang with sanctions relief at a time of their choosing. Just days before cancelling the summit, Trump tweeted that China had already begun relieving sanctions.⁴

1. Anthony Ruggiero, “Trump Cancelled the North Korea Summit. Here’s What He Should Do Next,” *Fortune*, May 25, 2018. (<http://fortune.com/2018/05/24/trump-north-korea-summit-cancelled-next-steps/>)

2. Michael R. Gordon, Michael C. Bender, and Andrew Jeong, “Pompeo to Meet with High-Ranking North Korean Ahead of Summit,” *The Wall Street Journal*, May 29, 2018. (<https://www.wsj.com/articles/north-korean-official-heads-for-u-s-as-adversaries-seek-path-to-nuclear-deal-1527592488>)

3. Jeremy Page, Andrew Jeong, and Ian Talley, “China, Finally, Clamps Down on North Korea Trade—And the Impact is Stinging,” *The Wall Street Journal*, March 2, 2018. (<https://www.wsj.com/articles/north-korea-finally-feels-the-sting-of-international-sanctions-1519923280>)

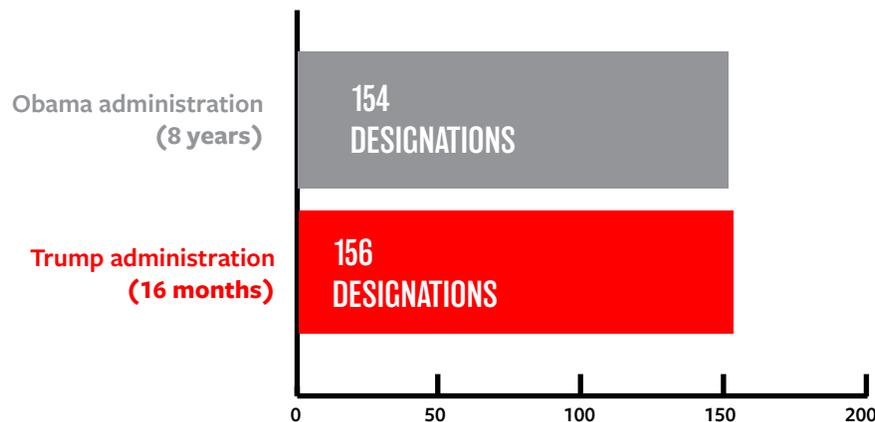
4. @realDonaldTrump, “China must continue to be strong & tight on the Border of North Korea until a deal is made. The word is that recently the Border has become much more porous and more has been filtering in. I want this to happen, and North Korea to be VERY successful, but only after signing!” *Twitter*, May 21, 2018. (<https://twitter.com/realDonaldTrump/status/998528928259170305>)

Anthony Ruggiero, a senior fellow at the Foundation for Defense of Democracies and its Center on Sanctions and Illicit Finance, was the nonproliferation advisor to the U.S. delegation to the 2005 rounds of the Six-Party Talks and spent more than 17 years in the U.S. government.

Last week Japan revealed that a Chinese-flagged vessel was likely violating sanctions by engaging in a ship-to-ship transfer with a sanctioned North Korea-linked vessel.⁵ The Trump administration also reportedly shelved a set of sanctions slated for release last week, suggesting that North Korea and China are successfully chipping away at the maximum pressure policy.⁶ The framework remains for a rapid resumption and intensification of the maximum pressure campaign. This memo lays out six key steps – diplomatic and military, as well as economic – the Trump administration should take to get the campaign back on track.

MAXIMUM PRESSURE RESULTS

The Trump administration issued more North Korean designations in just 16 months than the Obama administration did in eight whole years.⁷ This aggressive campaign undermined the common assumption that North Korea was already subject to comprehensive sanctions. Instead, the Trump administration’s unprecedented approach showed just how lackluster U.S. sanctions policy had been for more than a decade. While the number of new designations tells an important part of the story, there is also qualitative evidence that tougher sanctions have had an impact.



The North Korea Sanctions and Policy Enhancement Act, which came into effect February 18, 2016, marked a turning point in U.S. sanctions.⁸ The law spurred the Obama administration to issue new designations while creating the framework for the Trump administration’s maximum pressure policy. Whereas there had been 89 designations by the Obama administration during the seven years before the act’s passage, the U.S. Treasury

5. Tim Kelly, “Japan says it detects apparent Chinese ship breaking North Korea sanctions,” *Reuters*, May 29, 2018. (<https://www.reuters.com/article/us-northkorea-missiles-sanctions/japan-says-it-detects-apparent-chinese-ship-breaking-north-korea-sanctions-idUSKCN11U0ZS>)

6. Vivian Salama, Andrew Jeong, and Chun Han Wong, “White House Halts New North Korea Sanctions in Mad Dash to Save Summit,” *The Wall Street Journal*, May 29, 2018. (<https://www.wsj.com/articles/nations-race-to-save-korea-summit-1527547115>)

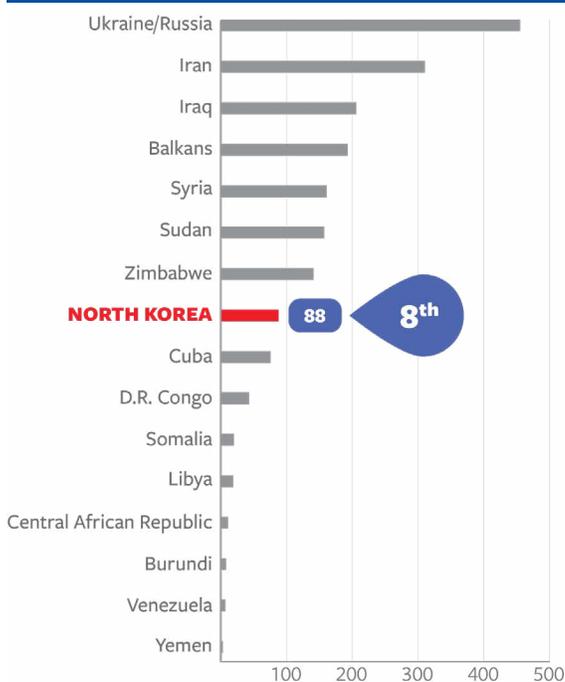
7. The Trump administration issued 156 designations, whereas the Obama administration issued 154. These figures refer to all those entities and individuals listed on the U.S. Department of the Treasury’s Office of Foreign Assets Control (OFAC) Specially Designated Nationals list. Five persons were designated twice under different authorities (Korea Mining Development Trading Corporation, Korea Tangun Trading Corporation, Reconnaissance General Bureau, Foreign Trade Bank of the Democratic People’s Republic of Korea, and O Kuk-Ryol); they were counted only once for our purposes. U.S. Department of the Treasury, Specially Designated Nationals List, accessed through August 29, 2017. (<https://sanctionssearch.ofac.treas.gov/>)

8. North Korea Sanctions and Policy Enhancement Act of 2016, Pub. L. No. 114-122, 130 Stat. 93, codified as amended at 114 U.S.C. (<https://www.congress.gov/114/bills/hr757/BILLS-114hr757enr.pdf>)

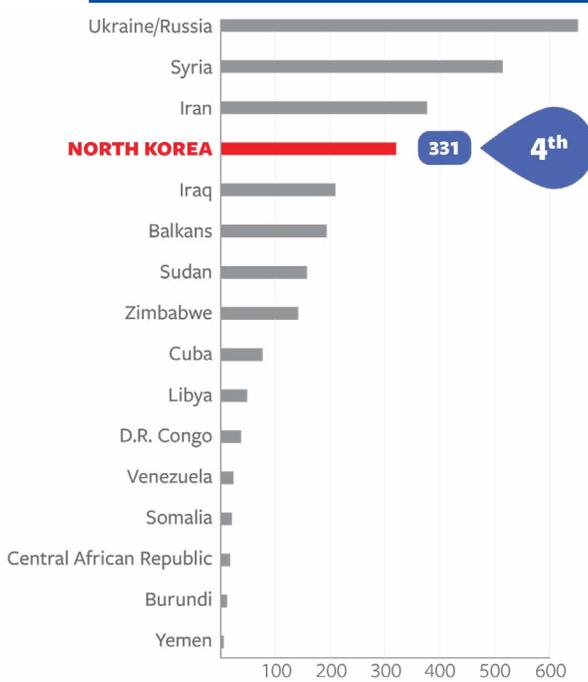
Department targeted 77 new entities and individuals in the final 11 months of the administration because of the act's requirements.⁹

Remarkably, at the time of the act's passage in February 2016, North Korea ranked eighth overall in terms of U.S. designations, falling behind lower priority targets such as Zimbabwe, Sudan, and the Balkans. Pyongyang now sits in fourth place, trailing only Ukraine/Russia, Syria, and Iran. This kind of company is more appropriate for Pyongyang, yet its ranking still indicates there is a long way to go before U.S. pressure has reached anything resembling "maximum."

Number of U.S. Sanctions prior to February 18, 2016



Number of U.S. Sanctions as of May 17, 2018



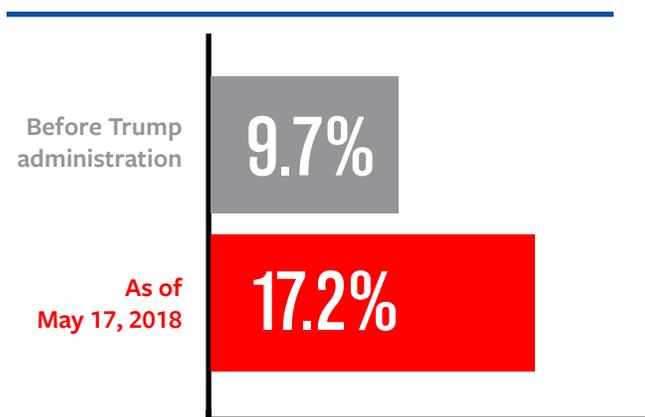
Since February 18, 2016, sanctions against North Korea have increased.

Even with the **276%** increase, North Korea is still not the most sanctioned country in the world.

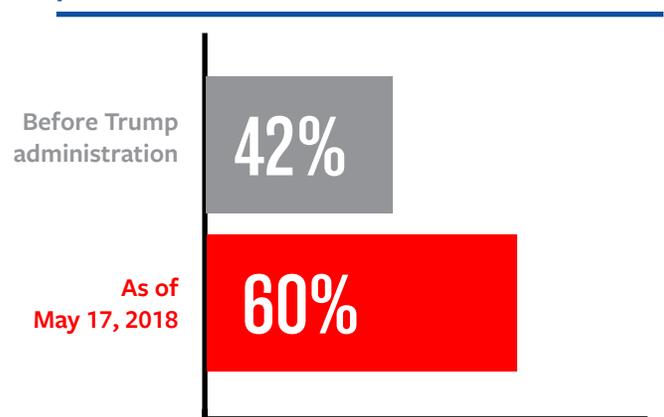
Calculating the raw total of Treasury designations comprises only the first part of the analysis. The next question is whether the new sanctions focused on the right targets. In the case of North Korea, sanctions must target non-North Koreans who facilitate Pyongyang's sanctions evasion, as well as North Korean individuals and businesses operating outside of North Korea who provide essential access to foreign markets and financial institutions. Again, the Trump administration's maximum pressure policy reflects a significant improvement in this regard. Before it took office, 9.7 percent of sanctions targeted non-North Koreans, a figure that is now up to 17.2 percent. Sanctions against persons operating outside of North Korea comprised 42 percent of the total before Trump's inauguration and now stands at 60 percent.

⁹ Before February 18, 2016, there were 89 designations. For the rest of 2016, when mandatory sanctions took effect, there were 77 designations.

Percentage of North Korea sanctions on non-North Koreans



Percentage of North Korea sanctions on persons outside of North Korea



The Trump administration also used the threat of sanctions to alter North Korea's trade and diplomatic relationships. More than 20 countries have curtailed and/or ended diplomatic and commercial relationships with North Korea.¹⁰ India restricted bilateral trade to food and medicine, even though New Delhi had been Pyongyang's second-largest trading partner, and Singapore suspended commercial trade with North Korea, even though it had been Pyongyang's seventh-largest trading partner.¹¹

Together, these efforts put tremendous pressure on Kim. Western journalists who visited the Chinese border with North Korea reported that factories were closing, electricity was in short supply, and North Korean troops were even using ox-drawn carts for transport.¹² There is good reason to believe that Kim proposed a summit, paused his nuclear and missile-testing programs, and released three U.S. hostages in order to relieve the pressure. Now is the time to ramp up the pressure until Kim makes a strategic decision to give up his nuclear weapons program.

ROOM FOR IMPROVEMENT

For all its success, the maximum pressure campaign never fully reckoned with the pivotal role that China plays in enabling North Korea to evade sanctions. It hosts North Korean operatives and is home to numerous companies that serve as fronts for North Korean operations. Beijing's dilatory enforcement of UN sanctions also provides critical breathing room for Pyongyang. Nonetheless, the Trump administration hesitated to confront China. It must do so now.

The administration also needs to make better use of the United Nations Panel of Experts' exhaustive annual reports on North Korea's sanctions evasion activities. The reports should be a roadmap for the sanctions investigators

10. Paul Sonne and Felicia Schwartz, "U.S. Pressure on North Korea's Global Ties Bears Fruit," *The Wall Street Journal*, October 8, 2017. (<https://www.wsj.com/articles/state-department-pressure-on-north-koreas-global-ties-bears-fruit-1507492004>)

11. For additional details, see: Anthony Ruggiero, "Evaluating Sanctions Enforcement and Policy Options on North Korea," *Testimony before Senate Committee on Banking, Housing, and Urban Affairs*, September 7, 2017. (http://www.defenddemocracy.org/content/uploads/documents/09-07-17_AR_Senate_Banking_Testimony-1.pdf)

12. Choe Sang-Hun, "Sanctions Are Hurting North Korea. Can They Make Kim Give In?" *The New York Times*, April 20, 2018. (<https://www.nytimes.com/2018/04/20/world/asia/north-korea-trump-sanctions-kim-jong-un.html>); Jeremy Page, Andrew Jeong, and Ian Talley, "China, Finally, Clamps Down on North Korea Trade—And the Impact Is Stinging," *The Wall Street Journal*, March 2, 2018. (<https://www.wsj.com/articles/north-korea-finally-feels-the-sting-of-international-sanctions-1519923280>)

at Treasury's Office of Foreign Assets Control. An overwhelming majority of the violators identified by the UN have not been sanctioned. Many factors play into the decision of whether a person is subject to sanctions, but this glaring oversight suggests that Washington is missing an opportunity to leverage the work of the Panel.

SIX KEY COMPONENTS OF MAXIMUM PRESSURE 2.0

Sanctions clearly hurt North Korea, but a full-spectrum pressure campaign has to include diplomatic and military components, as well. The following six recommendations identify the most important actions to take, although an exhaustive list would include many others:

Recommendation 1: Sanction Chinese banks. North Korea evades sanctions by relying on complicit banks or those that refuse to investigate whether they are supporting Pyongyang's activities. Last year, the Trump administration designated a small Chinese bank, Bank of Dandong, for acting as one of North Korea's money launderers.¹³ Treasury also issued a warning, in the form of an advisory on North Korea's use of the international financial system, which emphasized the role of Chinese banks.¹⁴

The Trump administration reportedly was close to sanctioning Agricultural Bank of China and China Construction Bank late last year – two of the largest in China, with more than a trillion dollars of assets each – but held back for fear of the impact on the global economy.¹⁵ This was a mistake. The U.S. needs to take a page from its Iran sanctions playbook and make it clear that foreign banks face a simple choice: Do business with the U.S. or do business with North Korea – it cannot be both. The U.S. does not have to move directly to imposing sanctions on major Chinese banks. If Beijing will not clean up its act, Treasury should first issue multi-billion-dollar fines and warn that Chinese banks may soon face even more significant penalties.¹⁶

Conventional wisdom suggests Beijing will shelter North Korea and its Chinese partners from international sanctions at all costs, but China made significant efforts to implement UN sanctions in 2017 after the White House launched its maximum pressure campaign.¹⁷ That said, Beijing began backsliding as soon as the Trump administration shifted from Maximum Pressure 1.0 to preparations for a summit.¹⁸ Only constant pressure will force its hand.

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13. U.S. Department of the Treasury, Financial Crimes Enforcement Network, "Proposal of Special Measure Against Bank of Dandong as a Financial Institution of Primary Money Laundering Concern," 82 Federal Register 31537, July 7, 2017. (https://www.fincen.gov/sites/default/files/federal_register_notices/2017-07-07/2017-14026.pdf)

14. U.S. Department of the Treasury, Financial Crimes Enforcement Network, "Advisory on North Korea's Use of the International Financial System," November 2, 2017. (<https://www.fincen.gov/sites/default/files/advisory/2017-11-02/DPRK%20Advisory%20FINAL%20508%20C.pdf>); Anthony Ruggiero, "Wakeup Call for Chinese Banks on North Korea Sanctions," *Foundation for Defense of Democracies*, November 6, 2017. (<http://www.defenddemocracy.org/media-hit/anthony-ruggiero-wakeup-call-for-chinese-banks-on-north-korea-sanctions/>)

15. Christian Berthelsen, "U.S. Considered Blacklisting Two Chinese Banks Over North Korea Ties," *Bloomberg*, April 13, 2018. (<https://www.bloomberg.com/news/articles/2018-04-13/china-banks-aiding-north-korea-are-said-too-big-to-punish>)

16. From 2012-2015, the U.S. levied more than \$12 billion in fines against large European banks for sanctions violations. Anthony Ruggiero, "Severing China-North Korea Financial Links," *Center for Strategic & International Studies*, April 3, 2017. (<https://www.csis.org/analysis/severing-china-north-korea-financial-links>)

17. Anthony Ruggiero, "Restricting North Korea's Access to Finance," *Testimony before House Committee on Financial Services, Monetary Policy and Trade Subcommittee*, July 19, 2017. (http://www.defenddemocracy.org/content/uploads/documents/Anthony_Ruggiero_Testimony_HFSC.pdf)

18. Oki Nagai, "Border town thrives as China eases up on North Korea trade," *Nikkei Asian Review* (Japan), May 23, 2018. (<https://asia.nikkei.com/Spotlight/North-Korea-crisis-2/Border-town-thrives-as-China-eases-up-on-North-Korea-trade>)

Recommendation 2: Increase Focus on North Korea's Shipping Sector. The Trump administration has only scratched the surface of sanctions on North Korea's shipping sector, which plays a crucial role in Pyongyang's evasion, including the prohibited transfer of commodities. The Trump administration targeted North Korea's shipping sector by sanctioning illicit networks and working with partners in the region to track Pyongyang's activities, including Pyongyang's use of ship-to-ship transfers to evade sanctions.¹⁹ In 2018, Treasury sanctioned 30 shipping companies and 34 vessels engaged in prohibited activities, including ship-to-ship transfers of fuel oil and refined petroleum products and export of coal. All of these are used to fund Pyongyang's nuclear weapons and missile programs.²⁰ Treasury also issued an advisory to the entire shipping industry on sanctions risks related to North Korea's shipping practices.²¹

To avoid increased scrutiny, North Korea and its facilitators have shifted from point-to-point transfers to risky ship-to-ship transfers at sea. Russian tankers reportedly transferred cargoes at sea late last year and one North Korean vessel engaged in ship-to-ship transfers three times.²² While identifying shipping networks that facilitate Pyongyang's activities is a critical first step, it must be followed by physically preventing North Korea from importing and exporting prohibited items. To that end, the U.S. should build a public coalition of countries that support a broad interpretation of UN sanctions, asserting that "reasonable grounds" exists to search all North Korea-linked vessels anytime and anywhere.²³ The coalition should conduct public interdiction exercises using military assets simulating consensual and non-consensual boarding. Washington should then board North Korea-linked vessels. These activities should be augmented by outreach to the shipping industry and additional sanctions against North Korea-linked shipping networks.

Recommendation 3: Defend South Korea and Japan. In 2017, the Trump administration used a combination of rhetoric, military assets, and military exercises to reinforce U.S. alliances with South Korea and Japan, and deter a North Korean military attack. The U.S. should resume and enhance its annual military exercises with

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19. Joshua Berlinger and Yoko Wakatsuki, "North Korean ship spotted likely violating sanctions a third time," *CNN*, February 14, 2018. (<https://www.cnn.com/2018/02/14/asia/north-korean-ship-japan-intl/index.html>)

20. U.S. Department of the Treasury, Press Release, "Treasury Sanctions North Korean Overseas Representatives, Shipping Companies, and Chinese Entities Supporting the Kim Regime," January 24, 2018. (<https://home.treasury.gov/news/press-releases/sm0257>); U.S. Department of the Treasury, Press Release, "Treasury Announces Largest North Korean Sanctions Package Targeting 56 Shipping and Trading Companies and Vessels to Further Isolate Rogue Regime," February 23, 2018. (<https://home.treasury.gov/news/press-releases/sm0297>)

21. U.S. Department of the Treasury, Office of Foreign Assets Control, "North Korea Sanctions Advisory: Sanctions Risks Related to North Korea's Shipping Practices," February 23, 2018. (https://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/Documents/dprk_vessel_advisory_02232018.pdf)

22. Guy Faulconbridge, Jonathan Saul, and Polina Nikolskaya, "Exclusive, Russian tankers fueled North Korea via transfers at sea – sources," *Reuters*, December 29, 2017. (<https://www.reuters.com/article/us-northkorea-missiles-russia-oil-exclus/exclusive-russian-tankers-fueled-north-korea-via-transfers-at-sea-sources-idUSKBN1EN1OJ>); Joshua Berlinger and Yoko Wakatsuki, "North Korean ship spotted likely violating sanctions a third time," *CNN*, February 14, 2018. (<https://www.cnn.com/2018/02/14/asia/north-korean-ship-japan-intl/index.html>)

23. UN Security Council requires "reasonable grounds" for inspections of North Korea-linked vessels, which is generally interpreted as requiring evidence that the transfer of cargo on the vessel violates the resolutions. North Korea has a history of hiding sanctions violations on vessels under "legitimate" cargo, and the U.S. should state that Pyongyang's efforts provide "reasonable grounds" for the inspection of all North Korea-linked vessels. For additional information on mandatory inspections for all North Korea-linked vessels, see: Anthony Ruggiero, "Restricting North Korea's Access to Finance," *Testimony before House Committee on Financial Services, Monetary Policy and Trade Subcommittee*, July 19, 2017. (http://www.defenddemocracy.org/content/uploads/documents/Anthony_Ruggiero_Testimony_HFSC.pdf)

South Korea and restart bomber flights over the Korean peninsula.²⁴ The Trump administration could deploy additional aircraft carriers or other military assets to the region to remind Beijing and Pyongyang of Washington's force projection capabilities and conduct military exercises with South Korea and Japan. The U.S. should also work with its partners to blunt the utility of North Korea's missile systems by augmenting missile defense and conducting additional trilateral missile defense exercises.²⁵ Finally, the Defense and State Departments should transition from bilateral approaches to a collective defense agreement with South Korea and Japan, including an explicit pledge that an attack on one is an attack on all (admittedly, this requires mitigating South Korea and Japan's mutual animosity).²⁶

Recommendation 4: Refer the Kim Regime to the International Criminal Court or Tribunal. More than anything, the Kim family regime fears an uprising by its own people; that is why they react so harshly to high-profile public criticism of their relentless abuse.²⁷ In 2014, a United Nations Commission of Inquiry said that North Korea's abhorrent human rights practices are directed by "the highest level of the state," and "the unspeakable atrocities that are being committed against inmates of the political prison camps resemble the horrors of camps that totalitarian States established during the twentieth century."²⁸ Last December, the UN Security Council held its fourth annual meeting on North Korea's human rights record, over Chinese objections.²⁹ The Trump administration should now push the Security Council to adopt one of the commission's recommendations and refer North Korea to the International Criminal Court or establish a dedicated tribunal.³⁰ If China uses its veto to protect the Kim regime, the Trump administration should treat Beijing as part of the problem and increase sanctions on Chinese facilitators. The U.S. should also name a special envoy for human rights and empower them to speak about the Kim regime's abhorrent record, push for international condemnation of North Korea, and, working with the Treasury Department, sanction additional North Korean human rights abusers. The U.S. could also push to revoke or suspend North Korea's UN membership – a possibility mentioned in UN Security Council Resolution 2321 (2016) – until it reforms its human rights record and stops violating UN Security Council resolutions.³¹

Recommendation 5: Enforce U.S. Sanctions on North Korean Overseas Laborers. The 2017 State Department Human Rights Report noted there are "an estimated 100,000 North Korean citizens working as overseas laborers,

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24. Barbara Starr and Zachary Cohen, "US B-52 bombers changed flight plan after North Korea threatened Trump summit," *CNN*, May 18, 2018. (<https://www.cnn.com/2018/05/18/politics/us-b-52-route-change-north-korea/index.html>)

25. Ankit Panda, "US, Japan, South Korea to Hold Missile Tracking Exercises," *The Diplomat* (Japan), December 11, 2017. (<https://thediplomat.com/2017/12/us-japan-south-korea-to-hold-missile-tracking-exercises/>)

26. Victor Cha and Katrin Fraser Katz, "The Right Way to Coerce North Korea," *Foreign Affairs*, May/June 2018. (<https://www.foreignaffairs.com/articles/north-korea/2018-04-01/right-way-coerce-north-korea>)

27. Robert E. McCoy, "Why North Korea is pushing back on its human rights record," *NK News* (South Korea), May 14, 2018. (<https://www.nknews.org/2018/05/why-north-korea-is-pushing-back-on-its-human-rights-record/>)

28. United Nations Human Rights Council, "Report of the Commission of Inquiry on Human Rights in the Democratic People's Republic of Korea," February 7, 2014. (<http://www.ohchr.org/EN/HRBodies/HRC/CoIDPRK/Pages/ReportoftheCommissionofInquiryDPRK.aspx>)

29. Michelle Nichols, "China fails to stop U.N. meeting on N.Korea human rights abuses," *Reuters*, December 11, 2017. (<https://www.reuters.com/article/northkorea-rights-un/china-fails-to-stop-u-n-meeting-on-n-korea-human-rights-abuses-idUSL1N1OB0VU>)

30. United Nations Human Rights Council, "Report of the Commission of Inquiry on Human Rights in the Democratic People's Republic of Korea," February 7, 2014. (<http://www.ohchr.org/EN/HRBodies/HRC/CoIDPRK/Pages/ReportoftheCommissionofInquiryDPRK.aspx>)

31. United Nations Security Council, Resolution 2397, December 22, 2017. (https://www.un.org/ga/search/view_doc.asp?symbol=S/RES/2397%282017%29)

primarily in Russia and China.”³² Many of them work in conditions that border on slavery, while the regime takes most of their earnings for itself. These slave laborers likely participated in the construction of venues for the upcoming soccer World Cups in Russia in 2018 and Qatar in 2022.³³ The Kim regime likely earns hundreds of millions of dollars a year from the practice, and the UN noted the regime uses the revenue for its nuclear weapons and missile programs.³⁴ UN Security Council Resolution 2397 (2017) requires countries to expel North Korean overseas workers by December 2019, but there is no reason to wait.³⁵ The U.S. should build a coalition of like-minded countries that commit to not accept North Korean overseas laborers. The Trump administration should issue tough U.S. sanctions against those who employ North Korean workers.³⁶

Recommendation 6: Stop North Korean Exploitation of Diplomatic Privileges. North Korea uses diplomatic privileges and diplomatic property for prohibited activities.³⁷ Pyongyang also uses a network of mostly embassy-based overseas banking and trade representatives to engage in overt and covert commercial and financial transactions.³⁸ Reducing the North Korean diplomatic and commercial footprint was a key element of the maximum pressure policy, and it is time to dismantle North Korea’s overseas network. The Trump administration should pressure other countries to expel their North Korean diplomatic or commercial representatives, or face consequences. It is past time for countries, including close U.S. allies, to end their relationships with North Korea.

CONCLUSION

The Trump administration’s maximum pressure policy played a significant role in getting Kim to the table, yet Kim has still not made a strategic decision to denuclearize. Now it is time for Maximum Pressure 2.0. It is a strategy that emphasizes peaceful means of exerting pressure by leveraging the unmatched strength of the U.S. economy. If pursued relentlessly, it can confront Kim Jong Un with the unpleasant choice between denuclearization and financial pain that far exceeds what his country has endured in the past.

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32. The report noted workers are reportedly present in Algeria, Angola, Bangladesh, Burma, Cambodia, Equatorial Guinea, Ethiopia, Democratic Republic of the Congo, Ghana, Guinea, Indonesia, Kyrgyzstan, Kuwait, Laos, Libya, Mali, Malaysia, Mongolia, Mozambique, Namibia, Nepal, Nigeria, Oman, Poland, Qatar, Senegal, Singapore, South Sudan, Tanzania, Taiwan, Thailand, the United Arab Emirates, Uruguay, Yemen, and Zambia. “Reports suggested some countries took steps to reduce the number of North Korean workers in their countries during the year.” U.S. Department of State, “Country Reports on Human Rights Practices for 2017,” April 20, 2018. (<https://www.state.gov/j/drl/rls/hrrpt/humanrightsreport/index.htm#wrapper>)

33. David Conn, “World Cup 2018: Fifa admits workers have suffered human rights abuses,” *The Guardian* (UK), May 25, 2017. (<https://www.theguardian.com/football/2017/may/25/fifa-world-cup-2018-workers-human-rights-abuses>); Allie Conti, “North Korean Slaves Are Building Qatar’s World Cup Centerpiece,” *Vice*, November 7, 2014. (https://www.vice.com/en_us/article/north-korean-slaves-are-building-qatars-world-cup-centerpiece)

34. Marcus Noland, “Organized Exports of Labor: Welcome to the Echo Chamber,” *Peterson Institute for International Economics*, June 1, 2015. (<https://piee.com/blogs/north-korea-witness-transformation/organized-exports-labor-welcome-echo-chamber>); United Nations Security Council, Resolution 2397, December 22, 2017. (https://www.un.org/ga/search/view_doc.asp?symbol=S/RES/2397%282017%29)

35. United Nations Security Council, Resolution 2397, December 22, 2017. (https://www.un.org/ga/search/view_doc.asp?symbol=S/RES/2397%282017%29)

36. Countering America’s Adversaries Through Sanctions Act, Pub. L. No. 115-44, 131 Stat. 886, codified as amended at 115 U.S.C. (<https://www.congress.gov/115/plaws/publ44/PLAW-115publ44.pdf>)

37. United Nations Security Council, “Report of the Panel of Experts established pursuant to resolution 1874 (2009),” S/2018/171, March 5, 2018. (<http://undocs.org/S/2018/171>)

38. For the most recent Treasury sanctions against North Korea’s commercial and financial network, see: U.S. Department of the Treasury, Press Release, “Treasury Sanctions North Korean Overseas Representatives, Shipping Companies, and Chinese Entities Supporting the Kim Regime,” January 24, 2018. (<https://home.treasury.gov/news/press-releases/sm0257>)