

Boycotting Bureaucrats:

Why administrators are targeted with individual sanctions

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Abstract

International organizations and states increasingly use economic and diplomatic sanctions, such as asset freezes and travel bans, against individuals rather than states. This paper examines the overlooked issue of target selection in research on individual sanctions.

Previous research argues that decisionmakers are optimal targets because they are able to make the policy changes desired by the sender. However, in reality, lower-level administrators are the most common targets despite their inability to change policies. In this paper, I examine target selection in individual sanctions imposed by the early adopters of individual sanctions, namely the EU, UN Security Council, and US. I argue that senders target administrators to direct the attention of audiences toward the policy output of the targeted administrators and frame it as illegitimate. I use a nested research design to test my argument. First, I enroll an original dataset of targeted individuals to detect empirical patterns consistent with my argument and alternative theories. Second, I use the dataset to identify a typical case of target selection and examine the underlying target selection process. The analysis finds quantitative and qualitative evidence consistent with my argument. The implication is that we should see individual sanctions as more than an attempt at effective economic coercion. Senders use individual sanctions to shape international and domestic debates, thereby advancing their own political agendas.

Keywords: targeted sanctions, economic sanctions, individual sanctions, United Nations Security Council, European Union, United States, WikiLeaks.

Introduction

It has become commonplace for influential international actors to impose individual sanctions, i.e. financial measures and travel restrictions against individual persons. It is now one of the main tools whereby the UN Security Council, EU, and US react to international crises (Zarate, 2009; Portela, 2010; Biersteker et al., 2018). Likewise, smaller states and regional organizations are adopting the legal frameworks necessary for individual sanctions (Manson, 2018). One of the main arguments in favor of individual sanctions is the ability to concentrate economic pressure on elite regime members. This is advantageous because elite regime members are decisionmakers with the power necessary to make the policy changes desired by the sanctioning state or international organization (known as a sender) (see e.g. Kirshner, 1997; Kaempfer, Lowenberg & Mertens, 2004; Allen, 2008). However, this argument has gained surprisingly little traction among practitioners. The only previous academic study on target selection finds that the UN Security Council primarily targets lower-level administrators with little influence on policies. The authors note that the logic behind this practice is difficult to understand and suggest that it hints at a lack of an overarching targeting strategy (Wallenstein & Grusell, 2012: 218). In this paper, I examine this puzzling practice and answer why administrators are targeted with individual sanctions. I argue that senders target lower-level administrators in an attempt to raise awareness about the policy output of the administrators and portray it as illegitimate. In turn, this may convince audiences to increase support for the sender and withdraw support from the regime responsible for the policy. Thus, the goal is produce audience costs rather than concentrate economic pressure on the regime. I use a nested research design combining quantitative and qualitative data to probe my argument (Lieberman, 2005). First, I conduct a Large-N analysis of targets of individual sanctions. For this purpose, I have coded an original dataset of the targeted individuals imposed by the UN Security Council, EU, and US (N=2605). The aim is

to assess whether senders are in fact targeting administrators in a manner consistent with argument and inconsistent with alternative explanations. From this analysis, it is clear that the tendency to target administrators is pervasive and not caused by the particular decision making structure of the UN Security Council, overall time trends, or only evident in a select cases. This is an indication that the targeting of administrators is an intentional strategy.

Second, I select a typical case based on the Large-N analysis and conduct a case study with the use of secondary literature and confidential material from the WikiLeaks Database CableGate. In the case study, it is evident that the US was identifying targets while knowing the economic impact would be limited, but with the aim to create audience costs.

The main contributions of this paper are two-fold. First, the paper reveals how states and international organizations use individual sanctions to address international and domestic crises. It provides welcome nuance to the simplistic view of sanctions as purely economic coercion (Crawford & Klotz, 1999; Grauvogel, 2015; Grauvogel, Licht & von Soest, 2017).

The analysis identifies new causal mechanisms whereby individual sanctions may work and opens avenues for innovative research into the effects of individual sanctions. Second, the paper shows the utility of drawing on new data source, namely the Specially Designated Nationals And Blocked Persons Lists (SDN Lists), as a way of discerning the underlying objectives and strategies of influential actors in international politics.

Why target decisionmakers?

Research on conventional sanctions asserts that sanctions must concentrate economic pressure on decisionmakers and their core supporters to reach policy concessions and regime change. Therefore, senders should use individual sanctions to target decisionmakers specifically. In this vein, Kirshner argues that the overall economic pain of economic is largely inconsequential. Rather, the most important factor is the extent to which the right

groups are hurt. Senders should concentrate economic pain on the central government and its core supporters (p. 42). Similarly, Kaempfer, Lowenberg, and Mertens argue that sanctions should impose hardship on members of the regime and immediate supporters to decrease the resources available to the regime relative to the opposition (p. 30). This idea has also been evident in the past when practitioners comment on individual sanctions. For example, after a new round of sanctions against individuals with ties to the Putin regime in Russia, Treasury Secretary Steven T. Mnuchin argued: “Russian oligarchs and elites who profit from this corrupt system will no longer be insulated from the consequences of their government’s destabilizing activities” (U.S. Department of the Treasury, 2018).

The idea of targeting decisionmakers is also foundational to the research agenda on targeted sanctions, which by definition seek to concentrate economic pain on decisionmakers while preventing harm to innocent bystanders (Cortright & Lopez, 2002; Tostensen & Bull, 2002; Drezner, 2003). Decisionmakers were directly responsible for implementing the policy leading to the imposition of sanctions and are therefore deserving of the punishment inherent to sanctions. Furthermore, when targeting decisionmakers only, one ensures that members of the general population with little influence on policies remain relatively unharmed (Lopez, 2012). As most states affected by sanctions are dictatorships, it is common for people to have little influence on the policies leading to the imposition of sanctions (Kaempfer, Lowenberg & Mertens, 2004). For example, the movement towards targeted sanctions was precipitated by the hardship endured by the Iraqi population as a consequence of UN sanctions in the early 1990s. Thus, the idea of targeting decisionmakers and core supporters also rests on ethical concerns.

Wallenstein and Grusell (2012) is the only previous study to assess target selection empirically. In line with previous research, the authors examine the extent to which the UN Security Council targets decisionmakers specifically. The authors find that the UN Security

Council rarely targets decisionmakers, instead opting to target administrators. In fact, leaders make up only 59 out of 446 targets (around 13 percent). Under the rationale of targeting core supporters, it is also surprising that supporters make up only 80 out of 446 targets (around 18 percent). Conversely, administrators make up 209 out of 446 targets, almost half of all targets (p. 218). This is a puzzle considering the number of researchers and practitioners arguing for targeting decisionmakers.

Why target administrators?

In addition to creating economic pressure on a target, sanctions also send a signal to audiences. This is more than mere symbolism. Sanctions make audiences more likely to increase support for the sender and retract support from targets, thereby increasing the likelihood of policy concessions and regime change (Cortright & Lopez, 2002; Giumelli, 2011; Grauvogel, 2015). I argue that this is the reason why states and international organizations commonly target lower-level administrators. Individual sanctions draw attention to the policy output of the administrators. For example, the EU has imposed individual sanctions on judges and security forces in Belarus to draw attention to instances of state violence against protesters (Yakouchyk, 2016). The individual sanctions against these administrators boost the awareness of the events, thereby decreasing the risk of audiences overlooking the events in question.

Moreover, the individual sanctions delegitimize the policy output of the administrators and indicate to audiences that a punishable offence has taken place. Returning to the example of state repression, governments often argue that the use of violence against protesters is justifiable in order to maintain public order and prevent acts of hooliganism or terrorism (Josua & Edel, 2015). The individual sanctions against administrators have the reverse effect because they portray the use of violence as illegitimate and deplorable by punishing the

responsible administrators. In this way, the targeting of state administrators specifically promotes an interpretation of the policy output as a problematic.

Individual sanctions against administrators increase awareness and frame the policy output of the administrators as punishable offences in the eyes of audiences. Senders intend to affect two important audiences with the individual sanctions. First, the sender's constituencies will take note of the individual sanctions and boost support for the adoption of further coercive measures. This is voters in the sender state and its international allies. For example, representatives from the US Administration have used the Magnitsky sanctions against Russian human rights offenders in an attempt to convince European states to adopt similar legislation (Manson, 2018). In international organizations, the member states of the organization are the most important constituency to persuade.

Second, the target's constituencies will take note of the individual sanctions. This is voters in the target state and its international allies. Individual sanctions may cause elite regime supporters to retract support from the regime or convince members of the general population to switch sides. Alternatively, the individual sanctions may convince international allies of the targeted regime to retract support. Through this argument with a focus on signaling and audience costs rather than direct economic coercion, it is rational for senders to target lower-level administrators despite their inability to change policies. However, there could also be alternative explanations for the tendency to target administrators, which I outline in the next section.

Alternative explanations

First, administrators may have become popular targets in compromises between stakeholders in the sender state or international organization. This is particularly plausible in the UN Security Council, which commonly generates political stalemates (see e.g. Glennon, 2003).

Targeting is a likely to become a bargaining object in a scenario where the permanent members are divided into interventionist and non-interventionist factions. When targeting lower-level administrators, the interventionist faction is allowed to act, while the non-interventionist faction maintains some respect for the sovereignty of the targeted regime. Similar compromises are less likely in the US and EU. The US and two of the major EU member states, namely France and the United Kingdom, are permanent members of UN Security Council. Therefore, there is good reason to expect a narrower range of preferences in the EU and US relative to the UN Security Council. With this in mind, I would expect the tendency to target administrators to be particularly evident in the UN Security Council. For the remainder of the paper, I refer to this as the compromise argument.

Second, there is an argument that administrators are in reality supporters of the regime. One could contend that the senders are targeting administrators with the expectation that the administrators will threaten to retract support from the regime. In turn, this gives the regime an incentive to provide policy concessions to retain the loyalty of these supporters. With this in mind, I would expect administrators to be likely supporters with some level of political influence and an ability to destabilize the regime by withdrawing support. I refer to this as the supporter argument.

Finally, there is an argument that senders prefer to target administrators because it is a cheap way to placate voters at home. According to this perspective, voters often demand some kind of action upon observing international conflict (ref). However, senders will want to avoid the political and economic costs associated with more costly instruments, such as conventional economic sanctions and military means. Similarly, senders will avoid targeting leaders with individual sanctions because this could cause diplomatic complications and hinder future negotiations. Conversely, individual sanctions against administrators provides a way for senders to satisfy the home audience in the cheapest possible fashion. If this is true, one

should expect senders to initially only target administrators and only escalate to targeting leaders in some particularly troubling cases. I refer to this as the cheapness argument.

Research design

I conduct a nested analysis consisting of a preliminary Large-N analysis followed by a model-testing case study of a typical case. The preliminary analysis encompasses all targets of individual sanctions imposed by the early adopters of individual sanctions, namely the UN Security Council, EU and US. The analysis covers the period 2000-2017 where individual sanctions have been in use (Zarate, 2009). The aim is to determine the plausibility of the main argument and alternative explanations. This allows me to rule out explanations without empirical support and assess the relative strength of explanations with some empirical support, which can then play a role in the second step of the nested analysis (Lieberman, 2005: 439).

Turning to the identification strategy employed in the Large-N analysis, I expect senders to target administrators to generate audience costs, thereby indirectly putting pressure on the regime. Therefore, we should observe senders targeting administrators and decisionmakers concurrently to maximize the audience and economic costs inflicted by the individual sanctions. The concurrent targeting of leaders and administrators separates the main argument from the cheapness argument. As the sender will avoid the political and economic costs incurred from targeting leaders, we should expect senders to first impose individual sanctions against administrators in an attempt to avoid targeting leaders entirely. Turning to the compromise argument, we should observe that the UN Security Council is more likely to target administrators than the EU and US. Conversely, the US should be the least likely to target administrators because it is a single state with less of a need to reconcile contrasting

interests. Finally, we should observe administrators to also be powerful supporters according to the supporter argument.

It is difficult to discern the strategies of senders from target lists alone and several explanations may remain at least partly plausible. Therefore, I conduct a model-testing case study of a typical case from the dataset in the second step of the nested analysis. For this purpose, I develop a series of observable empirical observations for each of the explanations. The focus is on whether the cause, intermediate steps corresponding to mechanisms, and effect in a typical case is consistent with my argument. Thus, the aim is to assess the argument empirically by looking at the causal mechanisms (p. 442).

[Planning to outline observable implications for the case study here]

Data

I constructed an original dataset of individuals under sanctions imposed autonomously by the US and EU to probe my argument empirically. The country-regimes under examination are listed in table 1. I restricted the dataset to autonomous sanctions, thereby excluding UN-mandated sanctions, to ensure independence between the senders and facilitate comparisons.

Table 1: Autonomous EU and US individual sanctions country-regimes (2000-2017)

		EU Years	US Years
1	Belarus	2004-	2006-
2	Burma	2000-2013	2007-
3	Burundi	2015-	2015-
4	Crimea	2014-	2014-
5	Egypt	2011-	
6	Guinea	2009-2010	
7	Russia		2013-
8	Syria	2011-	2005-
9	Tunisia	2011-	
10	Transnistria	2003-	
11	Uzbekistan	2005-2009	
12	Venezuela		2015-
13	Zimbabwe	2002-	2004-

The data comes from the Specially Designated Nationals And Blocked Persons Lists (SDN Lists) published by the European External Action Service in the EU and the Office of Foreign Asset Control in the US. The SDN Lists provide the occupation of the targeted individuals, which I coded according to coding scheme developed by Wallensteen and Grusell (2012). The coding scheme outlines four groups, namely leaders, administrators, supporters, and traders. Table 2 describes the four groups with my operationalization for each group. In the analysis, I combine my dataset with data from Wallensteen and Grusell on individual sanctions imposed by the UN Security Council. In the coding scheme, I ensured administrators were exclusively lower-level officials implementing public policy and outside political influence. This is to clearly separate administrators from supporters and thereby assess the validity of the support argument.

In the case study, I examine the target selection process and the underlying selection criteria. I use information from the WikiLeaks Database “Cablegate”, which contains a quarter-million leaked confidential diplomatic cables sent in the period 2003-2010 from consulates, embassies, and diplomatic missions to the US State Department. Due to the controversial nature of the documents, the use of diplomatic cables from WikiLeaks remains scarce in IR research. However, it is a highly valuable source of information, which should see greater scholarly use in the future despite past controversy (Michael, 2015; O’Loughlin, 2016).

Table 2: Coding scheme and operationalization

	Description	Operationalization
Leaders	Those directly responsible for the actions that the international community is objecting to.	Minister Presidential secretary Head of armed forces Head of judiciary Head of incumbent party Head of police Head of regional governments Member of politburo Member of cabinet Presidential adviser Capital mayor
Administrators	Indispensable for the execution of policy, but possibly less able to actually formulate or change such policies	Police official or officer Security force agent Judge Public manager Technician Scientist Member of the news media
Supporters	Supporters of the leadership, ranging from family members to party members and local decisionmakers. They are all needed for the leadership, but largely without much influence on what that leadership actually does.	Member of parliament Local politician Party official Member of electoral commission Family Friend Ambassador
Traders	Agents that deal with the actual international transactions that the sanctions aim to reduce (e.g., individuals involved in commerce, transportation, banking, or smuggling). They are likely to be significant for the conduct of policy, but again probably have little direct impact on the formulation of such policies.	Business owner Arms trader Smuggler

Note: Descriptions quoted from Wallensteen and Grusell (2012).

Analysis

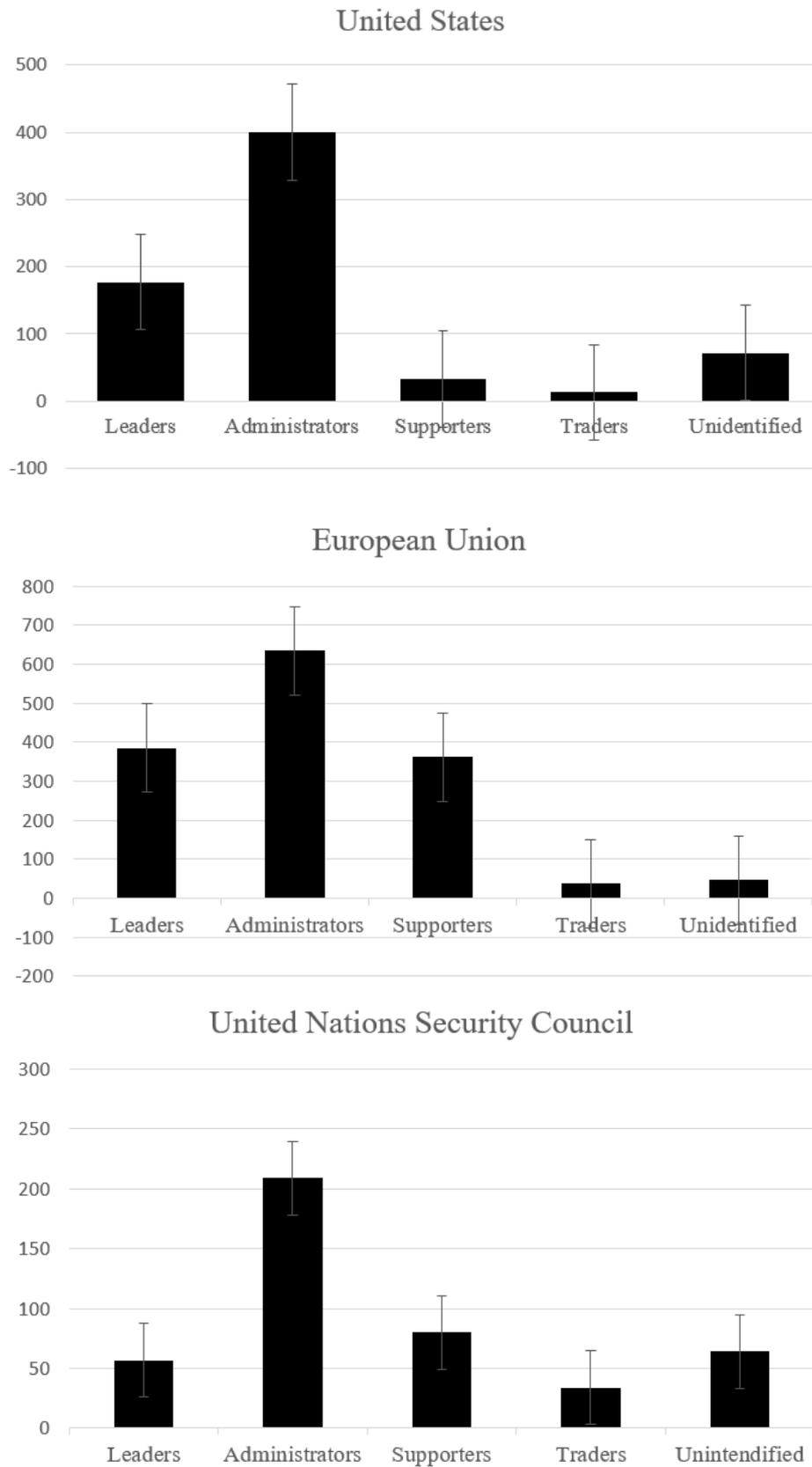
In table 3 and figure 1, target selection is compared across the three senders. This enables one to scrutinize the compromise argument, as the UN Security Council should be more likely to target than the others should. Administrators are the most common targets across all three of the senders. There is little indication that the UN Security Council is much more likely to target administrators than the other two senders. In line with the argument, the US is the least likely to target administrators, but the difference to the UN Security Council is marginal. As such, there is scant empirical evidence to support the compromise argument.

The support argument suggests that the administrators were in reality supporters. However, administrators remain the most common targets even when counting anyone with political influence as a supporter. The administrators are solely responsible for implementing policy. As such, it is implausible that senders would identify policy implementers particularly as the most important supporters of the regime and therefore good targets of individual sanctions. Therefore, the dataset provides limited evidence to corroborate the support argument in the dataset.

Table 3: Targets across senders

	Leaders	Administrators	Supporters	Traders	Others	Total
EU	385	634	362	37	46	1464
%	26.30	43.31	24.73	2.53	3.14	100
US	177	400	33	13	72	695
%	25.47	57.55	4.75	1.87	10.36	100
UNSC	57	209	80	34	64	446
%	13.27	46.86	17.94	7.62	14.35	100
Total	621	1243	475	84	182	2605
%	23.84	47.71	18.23	3.22	6.99	100

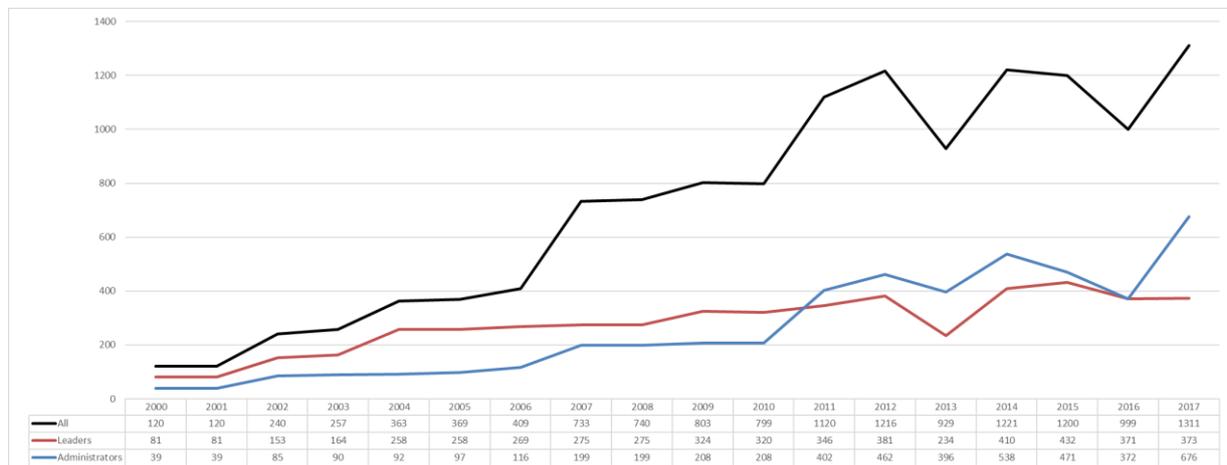
Figure 1: Target selection across senders



Note: Maximum number of targets for each country-regime with standard errors.

Turning to the cheapness argument, figure 2 shows target selection over time for all senders. The clearest trend is that individual sanctions have become increasingly popular. According to the cheapness argument, we should observe senders initially targeting administrators before escalating to leaders if necessary in the case. This is difficult to see in the figure 2. Rather, senders appear to target leaders and administrators concurrently. This is consistent with the main argument that proposes senders will use to individual sanctions to create economic and audience costs in parallel.

Figure 2: Target selection over time



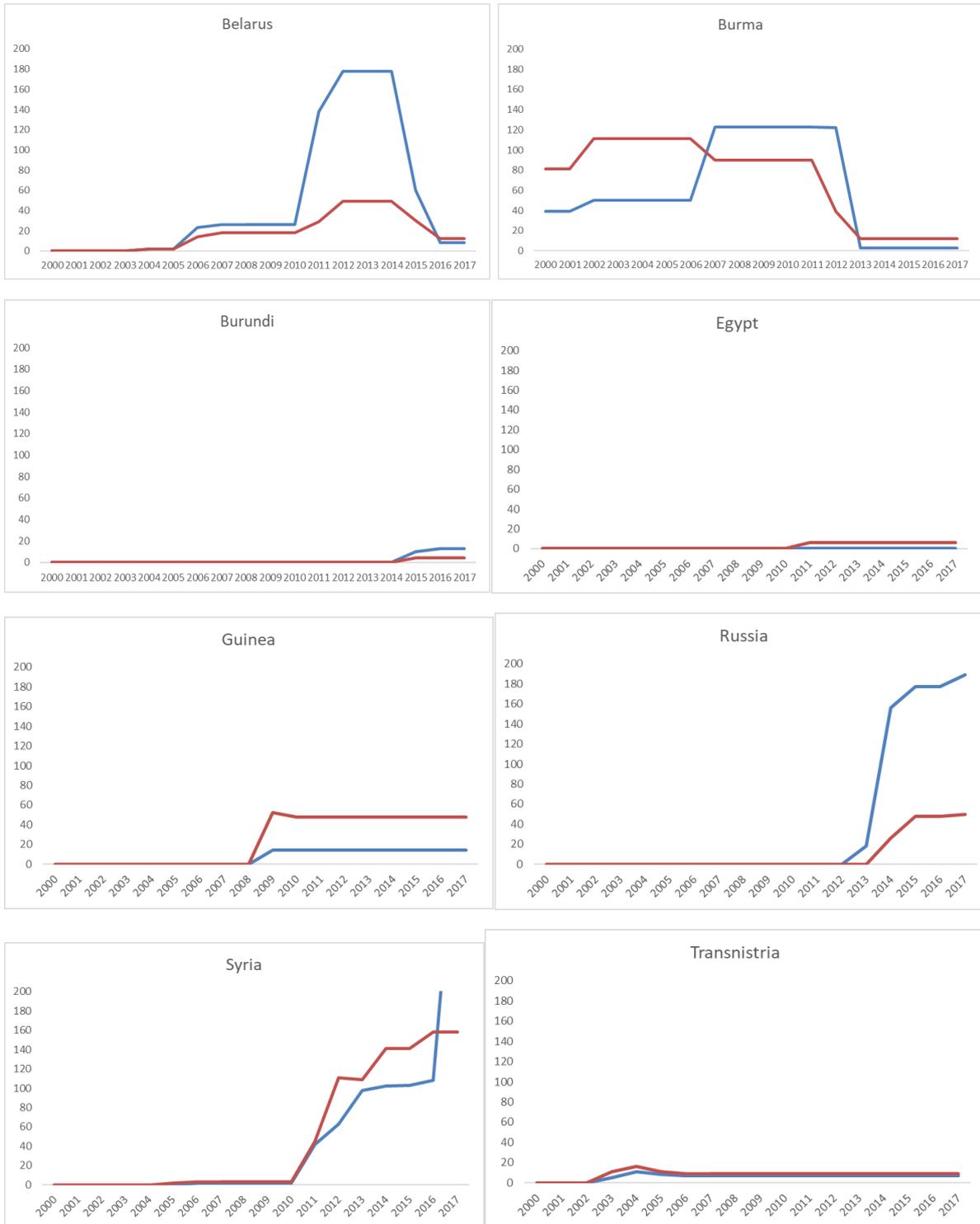
Note: Blue line = Administrators; Red line = Leaders; Black Line = All

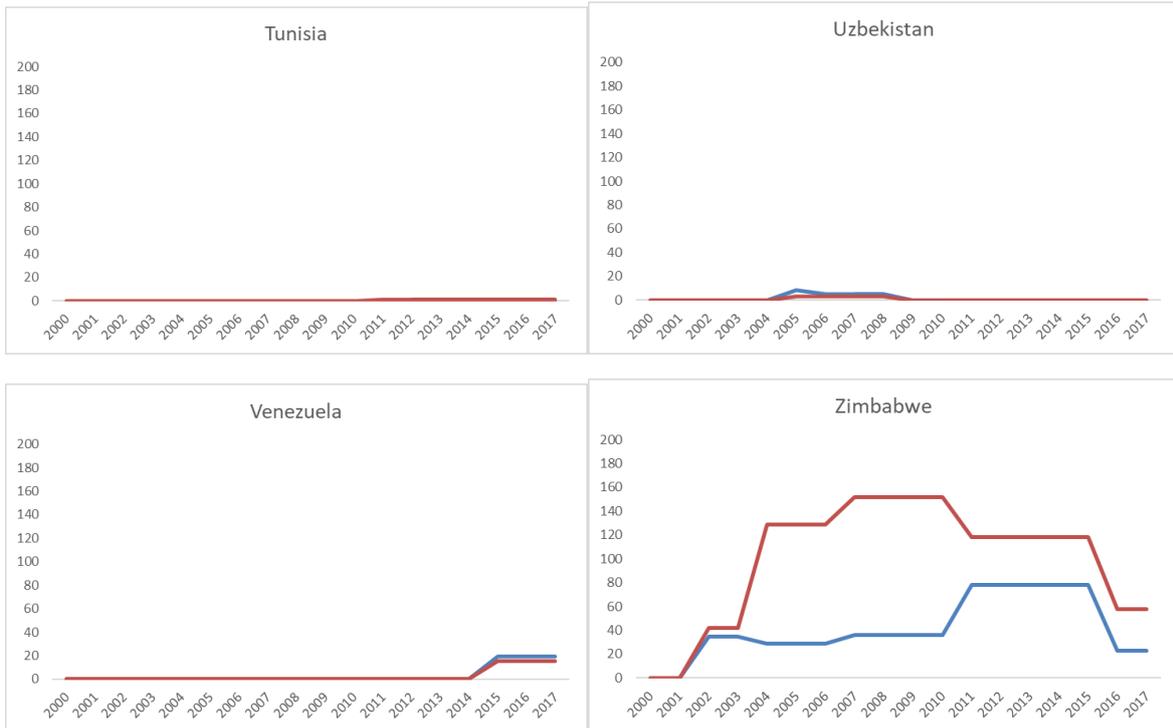
Further disaggregation may be needed to find empirical support for the cheapness argument.

The pattern depicted in figure 2 cuts across individual country-regimes. This prevents one from observing senders from initially only targeting administrator in hopes that they can avoid targeting leaders, thereby retaining diplomatic relations. Similarly, disaggregation is needed to detect whether there are cases where senders manage to only target administrators.

Figure 3 shows target selection across country-regimes.

Figure 3: Target selection across country-regimes





Note: Blue line = Administrators; Red line = Leaders.

The cheapness argument receives little support even when consulting the country-regimes individually. Rather, senders tend to impose sanctions against leaders and administrators at the same points in time. This empirical pattern is consistent with the main argument.

[Begin case selection process]

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