

though, on occasion, in somewhat milder form. Instead, what differs, it seems, from what can be discerned at this early stage, is the possibility of a shift in the Western alliance that championed (however imperfectly and inconsistently) human rights, democracy, law, international institutions, trade, and the sanctity of national territory, with the United States, led by a president unchecked by his own officials or by Congress, abandoning its allegiance to those commitments and those states, and switching sides, aligning with, and adopting some of the characteristics and policies of, the authoritarian states that were once the United States' rivals.

INTERNATIONAL ECONOMIC LAW

The United States Sanctions Georgians Overseeing Crackdown

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The United States has imposed sanctions and visa restrictions on Georgian officials and pro-Russia far-right political activists, including Bidzina Ivanishvili, the founder and honorary chairman of Georgia's ruling party, Georgian Dream.¹ The penalties, first issued in September 2024 and expanded in December, followed the government's enactment of a law requiring the registration of foreign-funded organizations, its violent suppression of those protesting the law's passage, and its crackdown on political opponents following parliamentary elections in October. The unrest stems from fundamental differences between the governing party, which has increasingly sought closer relations with Russia, and the opposition, which has favored deeper ties with the West, including membership in the European Union (EU) and the North Atlantic Treaty Organization (NATO). Since its electoral victory, which was marred by irregularities, the government has passed new laws further expanding its power to stifle opposition and stripping opposition members of parliament of their credentials.

In May 2024, the Georgian parliament adopted, over a presidential veto, a law "On Transparency of Foreign Influence."² The law requires organizations (non-profits,

¹ See U.S. Dep't of the Treasury Press Release, Treasury Sanctions Georgian Officials and Extremists for Serious Human Rights Abuse (Sept. 16, 2024), at <https://home.treasury.gov/news/press-releases/jy2580> [<https://perma.cc/776V-3WVX>] [hereinafter Treasury Department September Sanctions]; U.S. Dep't of State Press Release, Promoting Accountability for Serious Human Rights Abuse and Anti-democratic Actions in Georgia (Sept. 16, 2024), at <https://2021-2025.state.gov/promoting-accountability-for-serious-human-rights-abuse-and-anti-democratic-actions-in-georgia> [<https://perma.cc/GGZ2-5RXC>]; U.S. Dep't of State Press Release, Pursuing Visa Restrictions for Individuals Involved in Undermining Democracy in Georgia (Dec. 12, 2024), at <https://2021-2025.state.gov/pursuing-visa-restrictions-for-individuals-involved-in-undermining-democracy-in-georgia> [<https://perma.cc/7GLW-F5TZ>] [hereinafter December Visa Restrictions]; U.S. Dep't of State Press Release, Sanctioning Georgian Ministry of Internal Affairs Officials Involved in Serious Human Rights Abuses Against Protesters (Dec. 19, 2024), at <https://2021-2025.state.gov/sanctioning-georgian-ministry-of-internal-affairs-officials-involved-in-serious-human-rights-abuses-against-protesters> [<https://perma.cc/G7LK-PV6K>] [hereinafter Sanctioning Georgian Officials]; U.S. Dep't of the Treasury Press Release, Treasury Sanctions Georgian Ministry of Internal Affairs Officials for Brutality Against Protesters, Journalists, and Politicians (Dec. 19, 2024), at <https://home.treasury.gov/news/press-releases/jy2759> [<https://perma.cc/CJG3-UMTU>] [hereinafter Treasury Department December Sanctions]; U.S. Dep't of State Press Release, Sanctioning Georgian Dream Founder Bidzina Ivanishvili (Dec. 27, 2024), at <https://2021-2025.state.gov/sanctioning-georgian-dream-founder-bidzina-ivanishvili> [<https://perma.cc/8R7G-TQRG>] [hereinafter Ivanishvili Sanctions].

² Law of Georgia on Transparency of Foreign Influence (May 28, 2024), at <https://www.matsne.gov.ge/en/document/view/6171895?publication=0> [<https://perma.cc/2UUZ-FGGW>] [hereinafter Foreign Influence

broadcasters, and print and digital media) that receive more than twenty percent of their non-commercial income from a “foreign power” (foreign governments, organizations, and natural and legal persons) to register as “an organisation pursuing the interests of a foreign power” and submit an annual financial declaration.³ Registrations and financial declarations will be made public, and failure to register will result in fines.⁴ The law is similar to a 2012 Russian law, a version of which was subsequently adopted in Kazakhstan and Kyrgyzstan, and a Hungarian one that the Court of Justice of the European Union found was contrary to Hungary’s obligations as an EU member state, including those pertaining to freedom of association under the Charter of Fundamental Rights of the European Union.⁵ The Georgian law “presupposes,” the Council of Europe’s Venice Commission noted, “that anyone receiving foreign support will act in pursuit of the interests of the foreign funder,” and, thus, it seeks to “[s]tiffl[e] dissent,” “stigmatiz[e]” civil society organizations and independent media, and “undermine[] their public trust and access to financial resources.”⁶ More than ninety percent of the funding for Georgia’s civil society organizations comes from international donors, especially in the West.⁷ The government views foreign-funded organizations, including those receiving money from the U.S. Agency for International Development (USAID), as sowing “disturbance and destabilisation.”⁸ A draft foreign influence law had previously been introduced in early 2023, but it was withdrawn following public protests and threats from EU officials that passage would endanger the granting of EU candidate status to Georgia.⁹ That status was bestowed in December 2023.¹⁰ Within five months, though, the foreign influence law was reintroduced and approved.

Law]; Ivan Nechepurenko, *Georgia’s Ruling Party Secures a Contentious Law on Foreign Influence*, N.Y. TIMES (May 28, 2024), at <https://www.nytimes.com/2024/05/28/world/europe/georgia-foreign-agents-law-passes.html>.

³ Foreign Influence Law, *supra* note 2, Arts. 2–4, 6.

⁴ See *id.* Arts. 5–6.

⁵ See Ivan Nechepurenko, *A Proposed Law Targeting “Foreign Interests” in Georgia Riles the Opposition*, N.Y. TIMES (Apr. 30, 2024), at <https://www.nytimes.com/2024/04/30/world/europe/georgia-foreign-agent-bill.html>; Court of Justice of the European Union Press Release, *The Restrictions Imposed by Hungary on the Financing of Civil Organisations by Persons Established Outside that Member State Do Not Comply with EU Law* (June 18, 2020), at <https://curia.europa.eu/jcms/upload/docs/application/pdf/2020-06/cp200073en.pdf> [<https://perma.cc/CS45-T5M7>]; see also Jasmine D. Cameron & Fernanda G. Nicola, *The Spreading Impact of Restrictive “Foreign Agent” Laws and How to Stop Them*, JUST SECURITY (Dec. 10, 2024), at <https://www.justsecurity.org/105593/foreign-agent-laws-impact> [<https://perma.cc/Y9EW-5X97>].

⁶ European Commission for Democracy Through Law (Venice Commission), *Georgia – Urgent Opinion on the Law on Transparency of Foreign Influence* 11, 17, 19 (May 21, 2024), at [https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-PI\(2024\)013-e](https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-PI(2024)013-e) [<https://perma.cc/3D62-79VZ>].

⁷ See Asian Development Bank, *Civil Society Brief: Georgia* 5 (2020), at https://www.adb.org/sites/default/files/publication/611941/civil-society-brief-georgia_0.pdf [<https://perma.cc/R5NF-UVTC>].

⁸ Tata Shoshiasvili, *Georgia’s Ruling Party Accuse USAID of Preparing Activists for Revolution*, OC MEDIA (Oct. 2, 2023), at <https://oc-media.org/georgias-ruling-party-accuse-usaid-of-preparing-activists-for-revolution>.

⁹ See European Union External Action Press Release, *Georgia: Statement by the Spokesperson on the Draft Law on “Transparency of Foreign Influence”* (Feb. 24, 2023), at https://www.eeas.europa.eu/eeas/georgia-statement-spokesperson-draft-law-%E2%80%99Ctransparency-foreign-influence%E2%80%9D_en [<https://perma.cc/3CUK-3S39>]; Ivan Nechepurenko, *Protesters in Georgia Hold More Demonstrations Over a “Kremlin-Inspired” Law*, N.Y. TIMES (Mar. 8, 2023), at <https://www.nytimes.com/2023/03/08/world/europe/georgia-protests-foreign-agents-law.html>.

¹⁰ See European Council Meeting (14 and 15 December 2023) – Conclusions, para. 16, EU Doc. EUCO 20/23 (Dec. 15, 2023). Georgia’s candidate status was granted on the understanding that it would take the steps set out in the EU Commission’s recommendation. See Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions 2023 – Communication on EU Enlargement Policy 25–26, EU Doc. COM(2023) 690 final (Nov. 8, 2023).

Prior to the law's enactment, the White House had warned that adoption "will compel [the United States] to fundamentally reassess our relationship with Georgia."¹¹ With its final passage, U.S. Secretary of State Antony J. Blinken said that the law "would stifle the exercise of freedoms of association and expression, stigmatize organizations that serve the citizens of Georgia, and impede independent media organizations working to provide Georgians with access to high quality information."¹² Responding to the law's adoption and "the repressive tactics used [by Georgian authorities] to quell legitimate dissent [protesting the law]," Secretary Blinken announced a visa restriction policy for Georgia applicable to those "who are responsible for or complicit in undermining democracy in Georgia."¹³ He also announced a comprehensive review of bilateral cooperation with Georgia.¹⁴ As part of that review, the Defense Department called off a biannual cooperatively led military exercise in Georgia that had been scheduled for July 2024.¹⁵ And shortly thereafter, Secretary Blinken paused more than \$95 million in assistance "that directly benefits the Government of Georgia," only retaining programs that "strengthen[] democracy, rule of law, independent media, and economic development."¹⁶

The EU also condemned the foreign influence law upon its passage and indicated that the law "jeopardises Georgia's EU path, de facto leading to a halt of the accession process."¹⁷ The EU soon froze funding for Georgia's participation in the European Peace Facility, a financing instrument for military assistance.¹⁸ "[W]e will reduce our direct aid to the Georgian government, and we will try to shift it to civil society and the media," remarked Pawel Herczyński, the EU Ambassador to Georgia.¹⁹

In September, the Treasury Department sanctioned two Georgian Ministry of Internal Affairs officials and two right-wing political activists for their part in suppressing protests against the foreign influence law.²⁰ The officials, the chief of the Ministry's Special Task Department and his deputy, were designated for overseeing the "violent[] target[ing] [of]

Among those steps were for Georgia to "[c]onsult and engage with civil society, allowing for their meaningful involvement in legislative and policymaking processes and ensure they can operate freely." *Id.*

¹¹ White House Press Release, Press Briefing by Press Secretary Karine Jean-Pierre and United States Trade Representative Katherine Tai (May 14, 2024), at <https://bidenwhitehouse.archives.gov/briefing-room/press-briefings/2024/05/14/press-briefing-by-press-secretary-karine-jean-pierre-and-united-states-trade-representative-katherine-tai> [<https://perma.cc/BG9W-VKBT>].

¹² U.S. Dep't of State Press Release, Announcement of a Visa Restriction Policy for Undermining Democracy in Georgia and Comprehensive Review of All U.S.-Georgia Cooperation (May 23, 2024), at <https://2021-2025.state.gov/announcement-of-a-visa-restriction-policy-for-undermining-democracy-in-georgia-and-comprehensive-review-of-all-u-s-georgia-cooperation> [<https://perma.cc/UL8N-ZRJR>].

¹³ *Id.*

¹⁴ *See id.*

¹⁵ *See* U.S. Dep't of Defense Press Release, Postponement of Exercise Noble Partner Announcement (July 5, 2024), at <https://www.defense.gov/News/Releases/Release/Article/3827839/postponement-of-exercise-noble-partner-announcement> [<https://perma.cc/SBU5-REJ8>].

¹⁶ *See* U.S. Dep't of State Press Release, United States to Pause Assistance to the Government of Georgia (July 31, 2024), at <https://2021-2025.state.gov/united-states-to-pause-assistance-to-the-government-of-georgia> [<https://perma.cc/749B-RS62>].

¹⁷ European Council Meeting (27 June 2024) – Conclusions, para. 36, EU Doc. EUCO 15/24 (June 27, 2024).

¹⁸ EU Delegation Georgia, @EuinGeorgia, X (July 9, 2024, 2:47 a.m.), at <https://x.com/EuinGeorgia/status/1810566437662081331>.

¹⁹ Federico Baccini, *EU Begins Suspending Direct Funding to Georgia's Government: "Just the First Step,"* EUNews (July 9, 2024), at <https://www.eunews.it/en/2024/07/09/eu-suspension-georgia-government-funds>.

²⁰ *See* Treasury Department September Sanctions, *supra* note 1.

Georgian citizens, political opposition leaders, journalists, and youth activists who were peacefully expressing their views,” including through “brutal beatings.”²¹ The activists were the founder of Alt-Info, a privately owned far-right, pro-Russian media company that, according to the Treasury Department, “amplif[ies] disinformation and spread[s] hate speech and threats against marginalized communities,” and a media personality associated with Alt-Info who “is one of the most vocal supporters of violence against peaceful demonstrators and marginalized Georgians.”²² They were accused of “advocat[ing] for violent attacks” and “directly encourag[ing] violence.”²³ In October, the EU cut €121 million in assistance to Georgia as a result of its “democratic backsliding.”²⁴

In the parliamentary elections at the end of October, the Georgian Dream party captured eighty-nine seats and the four opposition parties won sixty-one.²⁵ President Salome Zourabichvili, who was endorsed by Georgian Dream when elected in 2018 but is now a critic, said that the October election was “a total falsification, a total stealing of votes.”²⁶ “We witnessed and were victims of,” she continued, “a real special operation conducted by Russia—a new type of hybrid warfare was waged against our people.”²⁷ Prime Minister Irakli Kobakhidze, of the ruling Georgian Dream party, said, in contrast, that the election had been conducted “flawlessly.”²⁸ The European Network of Election Monitoring Organizations noted of the election that “[c]ritical violations included violence against opposition members, voter intimidation, smear campaigns targeting observers, and extensive misuse of administrative resources” that “compromised the democratic integrity of the election process.”²⁹ Rallies and strikes protesting the election and subsequent government actions have continued from October to the present. In an ongoing crackdown, the government has violently broken up demonstrations, arrested and detained protesters, and raided opposition party offices and activists’ homes.³⁰

²¹ *Id.* The officials were designated pursuant to Executive Order 13818 “for being foreign persons who are, or have been, leaders or officials of an entity, including any government entity, that has engaged in, or whose members have engaged in, serious human rights abuse related to the leader’s or official’s tenure.” *Id.*

²² *Id.* On Alt-Info, see *Pro-Russian Alt-Info Channel Goes Off Air*, CIVIL GEORGIA (Oct. 29, 2024), at <https://civil.ge/archives/632148>.

²³ Treasury Department September Sanctions, *supra* note 1. Both were designated under Executive Order 13818 “for being foreign persons who are responsible for or complicit in, or have directly or indirectly engaged in, serious human rights abuse.” *Id.*

²⁴ EU Delegation Georgia, @EuinGeorgia, X (Oct. 8, 2024, 8:03 a.m.), at <https://x.com/EUinGeorgia/status/1843623247855923598>.

²⁵ See Ivan Nechepurenko, *Political Crisis Looms for Republic of Georgia After Disputed Election*, N.Y. TIMES (Oct. 27, 2024), at <https://www.nytimes.com/2024/10/27/world/europe/republic-of-georgia-election.html>.

²⁶ *Id.*

²⁷ *Id.*

²⁸ *Id.*

²⁹ European Network of Election Monitoring Organizations Press Release, ENEMO Election Observation Mission to 2024 Parliamentary Elections in Georgia Presented the Statement of Preliminary Findings and Conclusions (Oct. 27, 2024), at <https://enemo.org/post/enemo-election-observation-mission-to-2024-parliamentary-elections-in-georgia-presented-the-statement-of-preliminary-findings-and-conclusions-587> [<https://perma.cc/YY3J-43KF>]; see also Organization for Security and Co-operation in Europe Parliamentary Assembly Press Release, Georgia’s Elections Marred by an Uneven Playing Field, Pressure and Tension, But Voters Were Offered a Wide Choice: International Observers (Oct. 27, 2024), at <https://www.oscepa.org/en/news-a-media/press-releases/press-2024/georgias-elections-marred-by-an-uneven-playing-field-pressure-and-tension-but-voters-were-offered-a-wide-choice-international-observers> [<https://perma.cc/MET4-AAV6>].

³⁰ See Mary Ilyushina, *Georgia Protests Gather Momentum After Pro-Russia Party Suspends E.U. Bid*, WASH. POST (Dec. 4, 2024), at <https://www.washingtonpost.com/world/2024/12/04/georgia-european-union-protests-russia>; Jeffrey Gettleman, *Georgia Tumbles Deeper into Crisis as Government Detains Opposition Figures*, N.Y. TIMES (Dec.

In late November, the European Parliament “[s]trongly condemn[ed] the numerous and serious electoral violations,” urged the international community not to recognize the election results, and called for new parliamentary elections.³¹ In response, Prime Minister Kobakhidze suspended Georgia’s EU accession application.³² He said that Georgia was European, and “it is our responsibility to make Georgia a full-fledged member of the European family.”³³ Nonetheless, he said, “[w]e are a proud and self-respecting nation with a long history. Therefore, it is categorically unacceptable for us to consider integration into the European Union as a favour that the European Union should grant us.”³⁴

The United States criticized Georgia’s suspension of the EU accession process, “condemn[ed] the excessive use of force by police against Georgians seeking to exercise their rights to assembly and expression,” and halted the U.S.-Georgia Strategic Partnership because of these “anti-democratic actions.”³⁵ It called on the government to “return to its Euro-Atlantic path, transparently investigate all parliamentary election irregularities, and repeal anti-democratic laws that limit freedoms of assembly and expression.”³⁶ A subsequent statement by Secretary Blinken promised that “[t]hose who undermine democratic processes or institutions in Georgia . . . will be held to account.”³⁷ Soon thereafter, the State Department issued visa restrictions on approximately twenty Georgian government ministers, members of parliament, law enforcement and security officials, and private citizens.³⁸ The Treasury Department soon followed with sanctions on Georgian Minister of Internal

4, 2024), at <https://www.nytimes.com/2024/12/04/world/europe/georgia-russia-protests-gvaramia.html>; Jeffrey Gettleman, *In Georgia Protests, Echoes of Ukraine’s Past Revolutions*, N.Y. TIMES (Dec. 10, 2024), at <https://www.nytimes.com/2024/12/10/world/europe/georgia-protests-russia-ukraine.html>; Sophiko Megrelishvili & Dasha Litvinova, *A Russia-Like Crackdown Has Jailed Dozens in Georgia, with Human Rights Groups Sounding the Alarm*, AP (Feb. 4, 2025), at <https://apnews.com/article/georgia-russia-crackdown-human-rights-prisoners-9441742b7c3ec1001d097a3f7809d583>.

³¹ European Parliament Resolution of 28 November 2024 on Georgia’s Worsening Democratic Crisis Following the Recent Parliamentary Elections and Alleged Electoral Fraud, P10_TA(2024)0054 (Nov. 28, 2024), at https://www.europarl.europa.eu/doceo/document/TA-10-2024-0054_EN.html; see also European Parliament Resolution of 13 February 2025 on the Further Deterioration of the Political Situation in Georgia, P10_TA(2025)0019 (Feb. 13, 2025), at https://www.europarl.europa.eu/doceo/document/TA-10-2025-0019_EN.html. A joint statement by Nordic and Baltic foreign ministers urged new elections. See Joint Statement by the Nordic-Baltic Foreign Ministers on the Situation in Georgia (Dec. 29, 2024), at <https://www.regjeringen.no/en/aktuelt/joint-statement-by-the-nordic-baltic-foreign-ministers-on-the-situation-in-georgia/id3081491> [<https://perma.cc/RHG5-P5D6>]. The Parliamentary Assembly of the Council of Europe suspended some of the participatory rights of the Georgian delegation until “new genuinely democratic parliamentary elections” were held and other steps taken. Council of Europe Parliamentary Assembly Press Release, PACE President Regrets Decision of Georgian Delegation to Withdraw from the Assembly (Jan. 29, 2025), at <https://pace.coe.int/en/news/9762/pace-president-regrets-decision-of-georgian-delegation-to-withdraw-from-the-assembly> [<https://perma.cc/NE57-CMTF>].

³² See Lucy Davalou & Andrew Naughtie, *Georgian Prime Minister Suspends EU Membership Talks Until End of 2028*, EURONEWS (Nov. 28, 2024), at <https://www.euronews.com/my-europe/2024/11/28/georgian-prime-minister-suspends-eu-membership-talks-until-end-of-2028>.

³³ *Id.*

³⁴ *Id.*

³⁵ See U.S. Dep’t of State Press Release, Statement on Georgia’s Suspension of European Union Accession (Nov. 30, 2024), at <https://2021-2025.state.gov/statement-on-georgias-suspension-of-european-union-accession> [<https://perma.cc/SL64-TCGQJ>].

³⁶ *Id.*

³⁷ U.S. Dep’t of State Press Release, U.S. Support for Georgian People (Dec. 4, 2024), at <https://2021-2025.state.gov/u-s-support-for-georgian-people> [<https://perma.cc/M2WX-YPMD>].

³⁸ See December Visa Restrictions, *supra* note 1.

Affairs Vakhtang Gomelauri and Deputy Head of the Ministry's Special Task's Department Mirza Kezevadze "for brutal and violent crackdowns on members of the media, opposition, and protesters."³⁹ Treasury then designated Georgian Dream founder Ivanishvili for "undermining the democratic and Euro-Atlantic future of Georgia for the benefit of the Russian Federation," noting that he and his party "eroded democratic institutions, enabled human rights abuses, and curbed the exercise of fundamental freedoms in Georgia."⁴⁰ The European Council did not impose sanctions, due to opposition from Hungary and Slovakia.⁴¹

In February 2025, Georgia's parliament stripped forty-nine opposition members of parliament of their mandates.⁴² At the same time, it enacted legislation that increased penalties for "[p]etty [h]ooliganism," "[i]nsulting/offensive act toward/disobeying a policy officer," and "[v]andalism" and imposed new penalties for "[i]nsulting a Georgian [p]ublic [s]ervant" and "[v]iolating the [r]ules for [o]rganizing or [h]olding [a]ssemblies or [d]emonstration[s]."⁴³ The United States has not commented on the new laws beyond an Embassy Tbilisi statement advising U.S. citizens who might be traveling to Georgia that the laws prohibited activities that "in the United States could qualify as free speech."⁴⁴ A European Commission statement said that "[t]hese developments mark a serious setback for

³⁹ Sanctioning Georgian Officials, *supra* note 1; Treasury Department December Sanctions, *supra* note 1. The officials were sanctioned under Executive Order 13818, which implemented the Global Magnitsky Human Rights Accountability Act, Pub. L. 114-328, Tit. XII, Subtit. F, §§ 1261–1265, 130 Stat. 2000, 2533–38 (codified at 22 U.S.C. §§ 10101 et seq.).

⁴⁰ Ivanishvili Sanctions, *supra* note 1; U.S. Dep't of the Treasury Press Release, Russia-Related Designation; Issuance of Russia-Related General License and Frequently Asked Question (Dec. 27, 2024), at <https://ofac.treasury.gov/recent-actions/20241227> [<https://perma.cc/N5RY-7WUT>]. A general license was issued concurrently authorizing transactions with entities owned by Ivanishvili. See General License No. 116 – Authorizing Transactions Involving Entities Owned by Bidzina Ivanishvili (Dec. 27, 2024), at <https://ofac.treasury.gov/media/933766/download?inline> [<https://perma.cc/B2WN-95JY>]. A bipartisan bill codifying a Georgia sanctions regime is currently pending in Congress. See H.R. 36, 119th Cong., 1st Sess. (2025).

⁴¹ See Jorge Liboreiro, *Hungary and Slovakia Veto EU Sanctions on Georgian Officials as Protests Continue*, EURONEWS (Dec. 16, 2024), at <https://www.euronews.com/my-europe/2024/12/16/hungary-and-slovakia-veto-eu-sanctions-on-georgian-officials-as-protests-continue>. Eventually, the EU suspended visa-free travel for Georgian diplomats and officials. See Council of Europe Press Release, *Georgia: Council Suspends Visa-Free Travel for Diplomats and Officials* (Jan. 27, 2025), at <https://www.consilium.europa.eu/en/press/press-releases/2025/01/27/georgia-council-suspends-visa-free-travel-for-diplomats-and-officials> [<https://perma.cc/VU42-C6KK>]. Czechia, Estonia, Latvia, Lithuania, and the United Kingdom have imposed sanctions. See *Czechia Sanctions Three MIA Officials*, CIVIL GEORGIA (Jan. 30, 2025), at <https://civil.ge/archives/657459>; *Estonia, Latvia, Lithuania Expand Sanctions on Georgian Officials*, CIVIL GEORGIA (Mar. 3, 2025), at <https://civil.ge/archives/666721>; UK Foreign, Commonwealth & Development Office Press Release, *UK Sanctions Georgian Officials Responsible for Brutal Crackdown on Media and Protestors* (Dec. 19, 2024), at <https://www.gov.uk/government/news/uk-sanctions-georgian-officials-responsible-for-brutal-crackdown-on-media-and-protestors> [<https://perma.cc/3MNE-85UB>].

⁴² See *GD Terminates Mandates of 49 Opposition MPs, Stages New Parliamentary Group Formation*, CIVIL GEORGIA (Feb. 5, 2025), at <https://civil.ge/archives/659905>.

⁴³ U.S. Embassy Tbilisi, U.S. Embassy Tbilisi's Message on Newly Passed Amendments to the Administrative and Criminal Codes (Feb. 10, 2025), at <https://ge.usembassy.gov/u-s-embassy-tbilisi-message-on-newly-passed-amendments-to-the-administrative-and-criminal-codes> [<https://perma.cc/ZN7P-TD2R>] [hereinafter Embassy Tbilisi Message]; see also *GD Parliament Adopts Repressive Amendments in Third Reading*, CIVIL GEORGIA (Feb. 6, 2025), at <https://civil.ge/archives/660718> [<https://perma.cc/YNS2-YJG6>]. A "Foreign Agents Registration Act," with criminal penalties has also been introduced. See *Georgia Dream Introduces Criminal Liability for Non-compliance with Foreign Agents Registration Act*, CIVIL GEORGIA (Feb. 26, 2025), at <https://civil.ge/archives/665652>; *Deeper Look – Foreign Agents Registration Act*, CIVIL GEORGIA (Mar. 4, 2025), at <https://civil.ge/archives/667118>.

⁴⁴ Embassy Tbilisi Message, *supra* note 43.

Georgia's democratic development and falls short of any expectations of an EU candidate country."⁴⁵ A Venice Commission report concluded that new "measures are likely to have a chilling effect on the exercise of the freedoms of assembly and expression" and were "incompatible with the principles of lawfulness, necessity, and proportionality."⁴⁶

Following the U.S. presidential election, Georgian Dream anticipated that it would have better relations with the United States under President Donald J. Trump. In the weeks leading up to President Trump's inauguration, Prime Minister Kobakhidze said that "[o]ur goal is to restart the relationship with the United States from scratch, to renew the strategic partnership, to do this with specific leadership."⁴⁷ Once President Trump was in office, Prime Minister Kobakhidze welcomed the suspension of U.S. foreign aid through USAID, which, he said, had been used by the United States "to cause unrest in various countries, to organize revolutions, to destabilize countries."⁴⁸ He added, in a reference to the foreign influence law, that "[w]e cannot allow attempts to destabilize our country to be financed from outside."⁴⁹ Prime Minister Kobakhidze aligned himself with the "peace efforts by President Trump," referring to the shift in the U.S. administration's support for Ukraine.⁵⁰ Thus far, the Trump administration has not reciprocated Prime Minister Kobakhidze's entreaties. The United States has not revoked the Biden administration's hold on U.S. assistance to the Georgian government or withdrawn the sanctions and visa restrictions that were imposed.

The Department of Justice Issues Regulations to Prevent Access to Americans' Bulk Sensitive Personal Data by Foreign Adversaries

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The U.S. Department of Justice has issued regulations to prevent access to Americans' bulk sensitive personal data by foreign adversaries.¹ The rules prohibit for the first time U.S.

⁴⁵ European Commission Press Release, Statement by High Representative/Vice-President Kaja Kallas and Commissioner for Enlargement Marta Kos on the Situation in Georgia (Feb. 7, 2025), at https://enlargement.ec.europa.eu/news/statement-high-representativevice-president-kaja-kallas-and-commissioner-enlargement-marta-kos-2025-02-07_en [<https://perma.cc/V8SB-S62E>].

⁴⁶ European Commission for Democracy Through Law (Venice Commission), Georgia – Urgent Opinion on Amendments to the Code of Administrative Offences and the Law on Assemblies and Demonstrations 14 (Mar. 3, 2025), at [https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-PI\(2025\)004-e](https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-PI(2025)004-e) [<https://perma.cc/JCT2-87QN>].

⁴⁷ Премьер Грузии: для перезагрузки отношений с США «мы сделаем все» [*Georgian PM: We Will Do Everything to Reset Relations with the US*], SOVA (Dec. 30, 2024), at <https://sovanews.tv/2024/12/30/premer-gruzii-dlya-perezagruzki-otnoshenij-s-ssha-my-sdelaem-vse>.

⁴⁸ Kobakhidze Welcomes Trump Administration's Suspension of Foreign Funding, CIVIL GEORGIA (Jan. 31, 2025), at <https://civil.ge/archives/658405>.

⁴⁹ *Id.*

⁵⁰ Kobakhidze Detracts Global Party of War and Deep State as Opposing "President Trump's Peace Efforts," CIVIL GEORGIA (Mar. 1, 2025), at <https://civil.ge/archives/666572>.

¹ See Preventing Access to U.S. Sensitive Personal Data and Government-Related Data by Countries of Concern or Covered Persons, 90 Fed. Reg. 1636 (Jan. 8, 2025) [hereinafter Final Rule]. The regulations