





regime change via the economic strangulation of the Maduro government. This inconsistency is not lost on Latin American and Caribbean countries, which have received the bulk of over 4 million refugees that have fled Venezuela, the majority since 2015.

Consider the prelude to President Trump's August 5 executive order (EO) "Blocking Property of the Government of Venezuela." On August 3, Michael P. Duffey of the White House Office of Management and Budget (OMB) instructed the State Department and U.S. Agency for International Development (USAID) to freeze obligations of unspent foreign aid funds in fifteen different accounts, pending an OMB review. According to published reports, the freeze mirrors an effort last year by OMB director Mick Mulvaney to return billions of dollars in unobligated foreign aid to the U.S. Treasury. This year's OMB request was made during a congressional recess and less than two months before the end of the fiscal year. Congressional critics have denounced the OMB's actions as undermining Congress's power of the purse. Nonetheless, according to the Washington Post, OMB has indicated its intention to rescind what could amount to \$2-4 billion in foreign spending, while exempting favored projects of Ivanka Trump and Vice President Mike Pence.

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financial and oil sanctions on Venezuela, blocking all current and future "property and interests in property of the Government of Venezuela that are in the United States." The EO adds so-called secondary sanctions aimed at "any person determined... to have materially assisted, sponsored, or provided financial, material, or technological support" to the Venezuelan government. This latter provision is broadly understood as aimed at China and Russia, who have provided tens of billions of dollars in loans and investments to Venezuela. Issued on the eve of a major international summit in Lima, Peru, to build support for Venezuelan opposition leader Juan Guaidó, the sanctions dominated headlines—as did the presence of U.S. National Security Adviser John Bolton and Secretary of Commerce Wilbur Ross, there to announce a large package of reconstruction assistance following a democratic transition. But the new U.S. sanctions failed to garner regional support. Peruvian Foreign Minister Néstor Popolizio, who hosted the meeting, issued a lukewarm statement saying only that participating countries had "taken note" of the U.S. government's

decision (Peru has the second largest number of Venezuelan refugees in the region, close to

before had issued a blistering report condemning torture, extrajudicial executions, and

were "likely to significantly exacerbate the crisis for millions of ordinary Venezuelans."

900,000). Meanwhile, UN High Commissioner for Human Rights Michelle Bachelet, who only weeks

imprisonment of political opponents by the Maduro government, said that U.S. "unilateral sanctions"



The new U.S. sanctions make exceptions for food, medicine, clothing, and remittances and do not cover dealings with the Venezuelan private sector. In practice, however, these may be distinctions without a difference. According to an analysis by the international law firm Alston and Bird, "certain types of business transactions, even with private counterparties, may require transactions with government agencies or regulators." Hence, they conclude, "an assessment of the risk versus possible profits associated with doing business in Venezuela may very well lead many banks, exporters, and other businesses to conclude that it is preferable to treat Venezuela like one of the officially, comprehensively sanctioned countries/regions."

Even before the announcement of additional sanctions, the International Monetary Fund projected that Venezuela's economy would shrink by an additional 35 percent this year, meaning the country's economy has seen an over 60 percent cumulative decline since Maduro came into power in 2013. A 2018 survey by leading Venezuelan universities puts the poverty rate at above 90 percent, with households unable to meet basic nutritional needs. In these conditions, what was a human exodus last year of 5,000 per day will only continue to expand. Yet as of July 31, 2019, the international community had provided only 23.9 percent—less than a quarter—of the funds needed for regional refugee assistance. The United States provided some 67 percent of the total. But now, the OMB freeze of international accounts threatens additional support by USAID and the State Department's Office of Population, Refugees, and Migration (PRM), to Colombia, Peru, and other migrant-receiving



