

Client Alert: An Arms Embargo and Export Controls on Cambodia for Corruption, Human Rights Abuses, and China's Military Influence

Publications

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In response to “deepening Chinese military influence...as well as growing corruption and human rights abuses,” on December 8, 2021, the State Department and Commerce Department’s Bureau of Industry and Security (BIS) announced an arms embargo and new export controls on Cambodia. These actions follow a stream of other US government actions targeting Chinese influence and corruption in Cambodia, including (1) the Treasury Department’s Office of Foreign Assets Control’s September 2020 Global Magnitsky Act (GloMag) sanctions designation of Union Development Group Co., Ltd., a Chinese state-owned entity operating in Cambodia; (2) the November 2021 GloMag sanctions designation of two Cambodian government officials for their alleged role in the misappropriation of funds related to construction projects on Ream Naval Base after Deputy Secretary of State Wendy Sherman had cautioned Cambodia against the Chinese military’s exclusive use of the base; and (3) the November 2021 issuance of an inter-agency Cambodia Business Advisory on High-Risk Investments and Interactions. To read the full alert, [click here](#).

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