# topicality---sanctions

## United States

### us = federal government

#### ‘United States’ is the federal government.

**Mitchell ’15** [Paul; Founder of the Supreme Law Firm. Former Vice President for Legal Affairs and Counsel to an Arizona Trust. Private Attorney General. Criminal Investigator. MS and BA. “U.S. vs. U.S.A.” http://www.supremelaw.org/letters/us-v-usa.htm] TDI

Note also that those Articles clearly distinguished "United States of America" from "United States" in Congress assembled. The States formally delegated certain powers to the federal government, which is clearly identified in those Articles as the "United States". Therefore, the "United States of America" now refer to the 50 States of the Union, and the term "United States" refers to the federal government. The term "United States" is the term that is used consistently now throughout Title 28 to refer to the federal government domiciled in D.C. There is only ONE PLACE in all of Title 28 where the term "United States of America" is used, and there it is used in correct contradistinction to "United States": http://www.law.cornell.edu/uscode/28/1746.html Because Title 28 contains statutes which govern all federal courts, the consistent use of "United States" to refer to the federal government carries enormous weight. Title 28 is the latest word on this subject, as revised, codified and enacted into positive law on June 25, 1948. Moreover, the Supremacy Clause elevates Title 28 to the status of supreme Law of the Land.

### us = states

#### ‘United States’ means the 50 states.

LII ’ND [Legal Information Institute. “7 U.S. Code § 2116 — Definitions.” https://www.law.cornell.edu/uscode/text/7/2116] TDI

(e)The term “United States” means the 50 States of the United States of America.

## ought

### ought = desirability

#### ‘Ought’ means desirability of action.

Cambridge ’ND [“ought.” https://dictionary.cambridge.org/us/dictionary/english/ought] TDI

used to say that it is necessary or desirable to perform the action expressed in the verb:

## to

### to = object

#### ‘To’ indicates the action that ought to be taken.

Meriam Webster ’ND [“to.” https://www.merriam-webster.com/dictionary/to] TDI

used as a function word to indicate purpose, intention, tendency, result, or end

## remove

### remove = eliminate

#### ‘Remove’ means to get rid of.

Meriam Webster ’ND [“remove.” https://www.merriam-webster.com/dictionary/remove] TDI

to get rid of: ELIMINATE

### remove = permanent

#### **Remove means eliminate & must be permanent.**

Kyle ’10 [Richard; United States district judge, United States District Court for the District of Minnesota. “Buetow v. A.L.S. Enterprises, Inc.” United States District Court, D. Minnesota. 5-13-2010. 713 F. Supp. 2d 832 (D. Minn. 2010)] TDI

The word "eliminate" is subject to only one reasonable interpretation — complete elimination. In determining the meaning of challenged advertisements, a court may reference dictionary definitions. See Am. Italian Pasta Co. v. New World Pasta Co., 371 F.3d 387, 391 (8th Cir. 2004) (referencing a dictionary definition of "favorite"). The Compact Oxford English Dictionary provides that the word "eliminate" means "[t]o expel, exclude, remove, get rid of."The Compact Oxford English Dictionary 141 (2d ed. 1989). The American Heritage Dictionary provides that the word "eliminate" means "to wipe out someone or something, especially by using drastic methods such as banishment or execution." The American Heritage Dictionary 580 (4th ed. 2000). Thus, the word "eliminate" denotes a complete removal such that the word "complete" is unnecessary and repetitive.

The Third Circuit addressed a similar factual scenario when an advertisement stated that a product could "eliminate" a medical condition. Belmont Labs., Inc. v. Fed. Trade Comm'n, 103 F.2d 538, 540-41 (3d Cir. 1939). When the evidence demonstrated that the product could only "alleviate" the condition for a period of time, the advertisement was found to be false. Id.

Defendants have submitted several dictionary definitions equating the word "eliminate" with "remove." (Andre Decl. Exs. 12-14.) Defendants argue that because their carbon-embedded clothing removes a substantial amount of odor, its advertisements are not literally false. However, the Court finds that the use of the word "remove" would also be literally false if used in Defendants' advertisements. Here an example is helpful. If an advertisement states that a product will remove roaches from a home, the only reasonable expectation would be that all roaches would be removed, not just some. Accordingly, the Court finds Defendants' advertisements utilizing the "elimination" terminology, without further explanation, to be literally false.

### remove = transfer

#### ‘Remove’ allows transfer.

Meriam Webster ’ND [“remove.” https://www.merriam-webster.com/dictionary/remove] TDI

to change the location, position, station, or residence of

### remove = gradual

#### ‘Remove sanctions’ is gradual.

Attia & Grauvogel ’22 [Hana; German Institute for Global and Area Studies & University of Konstanz. Julia; German Institute for Global and Area Studies. “International Sanctions Termination, 1990–2018: Introducing the IST dataset.” Journal of Peace Research, Volume 60, Issue 4.] TDI

Our dataset also allows us to assess how sanctions end. We find that only approximately 26% of imposed sanctions are lifted in response to complete target acquiescence. This means that capitulation by senders despite the failure to achieve the prescribed goals is common. The IST dataset also underlines that sanctions termination is often a gradual process. Case studies on Iran and Zimbabwe showed that sanctions were lifted progressively and that goals were adapted repeatedly (Eriksson, 2007; Grauvogel & Attia, 2019). Like the EUSANCT dataset (Weber & Schneider, 2022), we also find cross-national evidence for the gradual nature of sanctions termination: more than 43% of the cases in the IST dataset are lifted gradually, including 42% of the EU, 50% of the UN and 48% of the US sanctions.11 In addition, our data provide the first systematic account of another aspect of gradualism: namely goal adaptation, which occurred in 12% of cases. Thus, our understanding of sanctions should move from a static conception that views the decision to remove sanctions as a binary event towards a more dynamic understanding that accounts for the gradual nature of this process.

### remove = statute

#### ‘Remove sanctions’ requires legislation. Presidential waivers aren’t removal.

Stangarone ’21 [Troy; Senior Director and Fellow, Korea Economics Institute. “Removing Sanctions on North Korea: Challenges and Potential Pathways.” Special Report, Number 504.] TDI

Removing the vast web of US unilateral sanctions on North Korea requires substantial progress on a wide range of issues.43 Should an agreement with North Korea be reached, there are limits on the US sanctions that the president could remove unilaterally. While the president can overturn executive orders and has the authority, with designated cabinet officials, to waive certain sanctions, statutorily required sanctions cannot be permanently removed without Congress repealing them or North Korea meeting certain requirements. For example, the president could waive prohibitions on providing North Korea with a Normal Trade Relations designation under the Trade Act of 1974, which would prevent North Korean exports to the United States from facing the highest level of tariffs. However, the president cannot permanently remove those restrictions. For North Korea to be granted the Permanent Normal Trade Relations (PNTR) designation, Pyongyang would need to take steps to allow emigration, transition to a market-based economy, and reform its political system, or Congress would need to pass legislation allowing the establishment of the PNTR designation.

## all

### all = all

#### ‘All’ means the whole extent of.

Meriam Webster ’ND [“all.” https://www.merriam-webster.com/dictionary/all] TDI

the whole amount, quantity, or extent of

## nearly all

### nearly all = plurality

#### ‘Nearly all’ refers to a plurality.

Thesaurus ’ND [“nearly all.” https://www.thesaurus.com/browse/nearly-all] TDI

noun as in plurality

### nearly all = almost

#### ‘Nearly’ means almost.

Meriam Webster ’ND [“nearly.” https://www.merriam-webster.com/dictionary/nearly] TDI

almost but not quite

#### That means at least 90%.

ABC ’15 [“Appendix 4: The six-point scale.” https://www.argyll-bute.gov.uk/moderngov/documents/s112443/Appendix%204%20%20Revised%20School%20Inspection%20Framework%20%20%20Six-point%20scale%2025082016%20Pre-Agenda%20of%20the.pdf] TDI

almost all means over 90%

## Venezuela Violation

#### No matter how you quantify sanctions (sectors, economic impact or targeted entities), the aff is far from ‘nearly all’.

Venezuelanalysis 23 [(The Blockade Against Venezuela: Measures and Consequences) https://venezuelanalysis.com/infographics/15295/, 03/01/2023] TDI

In recent years, the United States and its allies have unleashed a devastating blockade against Venezuela, targeting virtually all sectors of the economy, in hopes of triggering regime change. In this infographic, we detail the measures and deadly consequences of this multi-pronged aggression.



## of

### of = object

#### ‘Of’ indicates the object of the action.

Meriam Webster ’ND [“of.” https://www.merriam-webster.com/dictionary/of] TDI

used as a function word to indicate the object of an action denoted or implied by the preceding noun

## its

### its = possessive

#### ‘Its’ is possessive & exclusive.

Brent ’10 [Douglas; Attorney. “Reply Brief on Threshold Issues of Cricket Communications, Inc.” http://psc.ky.gov/PSCSCF/2010%20cases/2010-00131/20100602\_Crickets\_Reply\_Brief\_on\_Threshold\_Issues.PDF] TDI

AT&T also argues that Merger Commitment 7.4 only permits extension of “any given” interconnection agreement for a single three year term. AT&T Brief at 12. Specifically, AT&T asserts that because Cricket adopted the interconnection agreement between Sprint and AT&T, which itself was extended, Cricket is precluded from extending the term of its agreement with AT&T. Id This argument relies upon an inaccurate assumption: that the agreement (contract) between Sprint and AT&T, and the agreement (contract) between Cricket and AT&T, are one and the same. In other words, to accept AT&T’s argument the Commission must conclude that two separate contracts, i.e. the interconnection between Sprint and AT&T in Kentucky (“Sprint Kentucky Agreement”) and the interconnection between Cricket and AT&T in Kentucky (“Cricket Kentucky Agreement”), are one and the same. Upon this unstated (and inaccurate) premise AT&T asserts that “the ICA was already extended”; id. at 14, and “the ICA Cricket seeks to extend was extended by Sprint . . . .”; id. at 15, and, finally, “Cricket cannot extend the same ICA a second time . . . .” Id. (emphasis added in all). Note that in the quoted portions of the AT&T brief (and elsewhere) AT&T uses vague and imprecise language when referring to either the Sprint Kentucky Agreement, or the Cricket Kentucky Agreement, in hopes that the Commission will treat the two contracts as one and the same. But it would be a mistake to do so. The contract governing AT&T’s duties and obligations with Sprint is a legally distinct and separate contract from that which governs AT&T’s duties with Cricket. The Sprint Kentucky Agreement was approved by the Commission in September of 2001 in Case Number 2000-00480. The Cricket Kentucky Agreement was approved by the Commission in September of 2008 in Case Number 2008-033 1. AT&T ignores the fact that these are two separate and distinct contracts because it knows that the merger commitments apply to each agreement that an individual telecommunications carrier has with AT&T. Notably, Merger Commitment 7.4 states that “AT&T/BellSouth ILECs shall permit a requesting telecommunications carrier to extend its current interconnection agreement . . . . As written, the commitment allows any carrier to extend “its” agreement. Clearly, the use of the pronoun “its” in this context is possessive, such that the term “its” means - that particular carrier’s agreement with AT&T (and not any other carrier’s agreement). Thus, the merger commitment applies to each agreement that an individual carrier may have with AT&T. It necessarily follows then, that Cricket’s right to extend its agreement under Merger Commitment 7.4 is separate and distinct right from another carrier’s right to extend its agreement with AT&T (or whether such agreement has been extended).

## economic sanctions

### economic sanctions = withdrawal of trade

#### ‘Economic sanctions’ are withdrawal of trade and financial relations

Elliott & Hufbauer ’07 [Kimberly Ann; Research associate. Gary Clyde; Reginald Jones Senior Fellow, Institute for International Economics. “Sanctions.” https://www.econlib.org/library/Enc1/Sanctions.html] TDI

Students of international law frequently argue that only economic measures deployed against states that have violated international standards or obligations may properly be classified as "sanctions." According to this view sanctions should be distinguished from national uses of economic power in pursuit of narrow national interests. But common usage of the term economic sanctions typically encompasses both types of actions. The broader meaning is used here. Specifically, economic sanctions are the deliberate, government-inspired withdrawal, or threat of withdrawal, of customary trade or financial relations. ("Customary" refers to the levels of trade or financial activity that would probably have occurred in the absence of sanctions.)

### economic sanctions = broad

#### ‘Economic sanctions’ are actions taken against a national economy.

Cambridge ’ND [“economic sanctions.” https://dictionary.cambridge.org/us/dictionary/english/economic-sanctions] TDI

actions taken by a country or organization against the economy of another country, such as refusing to trade with it, in order to force it to obey a law or a set of rules:

### economic sanctions = comprehensive or targeted

#### ‘Economic sanctions’ are withdrawal of financial relations. They can be comprehensive or targeted.

Masters ’24 [Jonathan; Deputy Managing Editor, Council on Foreign Relations. “What Are Economic Sanctions?” https://www.cfr.org/backgrounder/what-are-economic-sanctions] TDI

Economic sanctions are defined as the withdrawal of customary trade and financial relations for foreign- and security-policy purposes. Sanctions may be comprehensive, prohibiting commercial activity with regard to an entire country, like the long-standing U.S. embargo of Cuba, or they may be targeted, blocking transactions by and with particular businesses, groups, or individuals.

### economic sanctions = partial or total

#### ‘Economic sanctions’ are restrictions on trade, travel and access to financial assets. They can be partial or total.

Metych ’23 [Michelle; M.A., DePaul University, B.A., Southeast Missouri State University. “economic sanctions.” https://www.britannica.com/topic/economic-sanctions] TDI

Economic sanctions, restrictions, including those on trade, travel, and access to financial assets, imposed by a national government upon another government, an organization, or an individual for the purpose of compelling or preventing certain actions or policies on the part of the targeted entity or individual. Economic sanctions against governments usually involve the partial or total suspension of preexisting trade relations. They may include but are not limited to asset freezes and seizures, export and import restrictions, travel bans, and arms embargoes. Economic sanctions are a common government response to challenges posed by armed conflicts, terrorism, human rights violations, drug smuggling, and other criminal or objectionable activities. Economic sanctions are often invoked as a first response to such challenges, because they can be levied in situations where military operations would be impossible or undesirable. They are also relatively inexpensive to implement and can be put in place quickly.

## on

### on = location

#### ‘On’ refers to location.

Meriam Webster ’ND [“on.” https://www.merriam-webster.com/dictionary/on] TDI

used as a function word to indicate the location of something

## islamic republic of iran

### iri = government

#### The ‘Islamic Republic of Iran’ is the government of Iran.

CIA ’24 [Central Intelligence Agency. “Iran.” https://www.cia.gov/the-world-factbook/countries/iran/#government] TDI

Government

Country name

conventional long form: Islamic Republic of Iran

### iri = country

#### The ‘Islamic Republic of Iran’ is the country.

Avery & Mostofi ’24 [Peter; Former Lecturer in Persian, University of Cambridge; Fellow of King's College, Cambridge. Khosrow; Professor of Political Science, University of Utah, Salt Lake City; Director, Middle East Languages and Area Center. “Iran.” https://www.britannica.com/place/Iran] TDI

Also known as: Islamic Republic of Iran, Jomhūrī-ye Eslāmī-ye Īrān

Iran, a mountainous, arid, and ethnically diverse country of southwestern Asia. The country maintains a rich and distinctive cultural and social continuity dating back to the Achaemenian period, which began in 550 BCE. Since 1979 it has become known for its unique brand of Islamic republic. Although the system of government was intended as a parliamentary democracy, persistent instability both at home and abroad have steered its slide into a more theocratic authoritarianism. In 2022 the state’s push to pacify economic unrest through repression prompted widespread and debilitating protests, which were catalyzed in part by the death of Jina Mahsa Amini while she was in custody for improper attire. The repression that was seen before, during, and after those protests coincided with questions over the succession of the aging Ali Khamenei, the autocratic leader (rahbar) for more than three decades.

## democratic people’s republic of korea

### dprk = government

#### The ‘Democratic People’s Republic of Korea’ is the government of North Korea.

CIA ’24 [Central Intelligence Agency. “Korea, North.” https://www.cia.gov/the-world-factbook/countries/korea-north/] TDI

Government

Country name

conventional long form: Democratic People's Republic of Korea

### dprk = country

#### The ‘Democratic People’s Republic Korea’ is the country.

Lee & Yu ’24 [Chan; Emeritus Professor of Geography, Seoul National University. Woo-Ik; Professor of Geography, Seoul National University. “North Korea.” https://www.britannica.com/place/North-Korea] TDI

Also known as: Chosŏn Minjujuŭi In’min Konghwaguk, Democratic People’s Republic of Korea

North Korea, country in East Asia. It occupies the northern portion of the Korean peninsula, which juts out from the Asian mainland between the East Sea (Sea of Japan) and the Yellow Sea; North Korea covers about 55 percent of the peninsula’s land area. The country is bordered by China and Russia to the north and by the Republic of Korea (South Korea) to the south. The national capital, P’yŏngyang, is a major industrial and transport centre near the west coast.

## bolivarian republic of venezuela

### brv = government

#### The ‘Bolivarian Republic of Venezuela’ is the government of Venezuela.

CIA ’24 [Central Intelligence Agency. “Venezuela.” https://www.cia.gov/the-world-factbook/countries/venezuela/] TDI

Government

Country name

conventional long form: Bolivarian Republic of Venezuela

### brv = country

Liuwen & McCoy ’24 [Edwin; Professor of Latin-American History, University of New Mexico. Jennifer; Professor of Political Science, Georgia State University. Director, Latin American and Caribbean Program, The Carter Center.“Venezuela.” https://www.britannica.com/place/Venezuela] TDI

Also known as: Bolivarian Republic of Venezuela, República Bolivariana de Venezuela

Venezuela, country located at the northern end of South America. It occupies a roughly triangular area that is larger than the combined areas of France and Germany. Venezuela is bounded by the Caribbean Sea and the Atlantic Ocean to the north, Guyana to the east, Brazil to the south, and Colombia to the southwest and west. The national capital, Caracas, is Venezuela’s primary centre of industry, commerce, education, and tourism.

## country = people

### country = people

#### ‘Country’ refers to the people.

Meriam Webster ’ND [“country.” https://www.merriam-webster.com/dictionary/country] TDI

the people of a state or district : POPULACE

## mechanics

### plain meaning prodict

#### Prefer plain meaning.

Scalia & Garner ’12 [Antonin; Justice on the Supreme Court of the United States. Bryan; American lawyer, lexicographer, and teacher. “Ordinary-Meaning Canon.” Reading Law: The Interpretation of Legal Texts, Chapter 6.] TDI

Words are to be understood in their ordinary, everyday meanings—unless the context indicates that they bear a technical sense.

“The enlightened patriots who framed our constitution, and the people who adopted it, must be understood to have employed words in their natural sense, and to have intended what they have said.”

Chief Justice John Marshall,

Gibbons v. Ogden, 22 U.S. (9 Wheat.) 1, 71 (1824).

The ordinary-meaning rule is the most fundamental semantic rule of interpretation.1 It governs constitutions, statutes, rules, and private instruments. Interpreters should not be required to divine arcane nuances or to discover hidden meanings. Justice Joseph Story’s words are as true today as they were when written in the middle of the 19th century, and they are true not just of constitutions but of all other legal instruments:

[E]very word employed in the constitution is to be expounded in its plain, obvious, and common sense, unless the context furnishes some ground to control, qualify, or enlarge it. Constitutions are not designed for metaphysical or logical subtleties, for niceties of expression, for critical propriety, for elaborate shades of meaning, or for the exercise of philosophical acuteness or judicial research. They are instruments of a practical nature, founded on the common business of human life, adapted to common wants, designed for common use, and fitted for common understandings.2