

Sanctions 2.0:

Thwarting the Myanmar Junta's Rebranding and Cutting Off Their International Enablers



As the junta prepares to stage a sham election while continuing to brutalize the population through indiscriminate airstrikes and other atrocities, there are several immediate steps that the US, UK, EU, Canada, Australia, and other likeminded jurisdictions can take to impose meaningful financial pressure on the junta and disrupt its ability to wage war against the Myanmar people.

Joint Report by



On February 1, 2021, the Myanmar military launched a coup, ending the country's limited political reform process.^{1 2} Myanmar's people rose up against the military's attempt to grab power and further shift the country towards heightened authoritarianism, first through peaceful means and then, when faced with brutal repression, through armed conflict.^{3 4}

The military junta has since plunged the country into a deadly civil war, and it has seen its political and territorial control significantly reduced.⁵ Yet, by using extreme brutality and receiving vital support from external actors, the junta has clung on to its deadly tactics of oppression and avoided total collapse.⁶

As Myanmar nears the end of its fifth year of the coup, in an attempt to build control of the country's territory and falsely gain legitimacy, the junta is attempting to orchestrate the pretense of a transition to civilian rule.⁷ The junta and its leader, Min Aung Hlaing, are engaging in diplomatic efforts to convince countries including Russia, China, India, Belarus, and members of the Association of Southeast Asian Nations (ASEAN) to support the sham election.⁸ Domestically, the junta passed a law to outlaw protests and criticism of its sham election, with potential punishments including the death penalty.⁹

The European Union (EU) has already denounced the "regime-sponsored elections,"¹⁰ and likeminded countries should follow in its footsteps, denounce the sham election, and reject the results.

Moreover, though condemnation is important, the international community should go further and take meaningful steps to disrupt the junta's brutal war on the people of Myanmar.

In preparation for its sham election, the junta rebranded its executive, legislature, and judicial body.¹¹ Within a day of this change, US lobbyists were contracted to represent the junta as part of its campaign to manufacture false legitimacy.¹² With coordinated and targeted international action, and without the support of enablers, the junta's ability to wage its brutal war against the people of Myanmar would be significantly impaired.¹³ The junta's continued survival is due in part to the US, UK, EU, Canada, Australia, New Zealand, and other likeminded states' reluctance to adopt financial tools of pressure, including targeted network sanctions, against it and its international enablers.

Sanctioning authorities should urgently take concrete actions to disrupt and degrade the junta's ability to wage war against the Myanmar people. With a sham election around the corner, these jurisdictions should seize the opportunity and adopt sanctions against the junta's rebranded body and its international enablers.

The Junta's Rebranding

The junta and the Myanmar military reorganized institutional structures on July 31 and August 1, 2025,^{14 15} ¹⁶ in preparation for a sham electoral process to be held in phases in December 2025 and January 2026.¹⁷ As part of this rebranding, junta leaders dissolved the sanctioned State Administrative Council (SAC) and created a new entity, the State Security and Peace Commission (SSPC).¹⁸ The new SSPC performs substantially similar functions and is led by the same individuals as the SAC, all of whom are sanctioned.^{19 20}

On February 1, 2021, the military launched a coup, claiming without evidence that the November 2020 election were neither free nor fair.^{21 22} Myint Swe, the then vice president who was a military appointee, illegally took the position of pro tem president, declared a state of emergency and ordered legislative, executive, and judicial powers to be transferred to Min Aung Hlaing in his position as commander-in-chief.²³

The next day, Min Aung Hlaing established the 11-member SAC as the junta's executive, legislative, and judicial body under the state of emergency.²⁴ Min Aung Hlaing appointed himself as chair of SAC, appointed his deputy commander-in-chief Soe Win as vice-chair, and chose mostly senior military officials as members.²⁵

The US responded **ten days later,** sanctioning both Min Aung Hlaing and Soe Win, who were previously designated for serious human rights abuses in 2019, for their role in the coup. ²⁶

On May 17, 2021, the US sanctioned the SAC, stating that it was “the official name of the military government in [Myanmar]”.²⁷ The EU, the UK, and Canada also sanctioned the SAC ^{28 29 30} and its leaders, Min Aung Hlaing and Soe Win.^{31 32 33} Australia and New Zealand³⁴ did not sanction the SAC but did sanction its members.³⁵

On July 31, 2025, Myanmar's National Defence and Security Council (NDSC) met. In the meeting, SAC transferred its powers to the NDSC, a body made up of largely the same individuals also led by Min Aung Hlaing, in preparation for the junta to orchestrate a so-called “election” within six months. The NDSC revoked the February 1, 2021, state of emergency order, which dissolved SAC, and formed the SSPC to perform the executive, legislative, and judicial functions of the state. ^{36 37} NDSC named Min Aung Hlaing as chair of SSPC and Soe Win as vice-chair. ³⁸

Multiple Grounds for Sanctioning SSPC

The SSPC is a transitional body established to oversee the upcoming sham election and give the pretense of a political transition,^{39 40} with the junta “seeking recognition for the elections to give its rule a veneer of legitimacy to gain acceptability so that business can carry on as usual.”⁴¹

The overlap in senior figures of the three junta entities—the SAC, the SSPC, and the NDSC—is substantial, a further sign that the transition to the SSPC cannot in any sense be viewed as a positive reform and that all three entities are controlled by the military. In total, eight of the 10 members of the SSPC are also members or office holders of the NDSC.^{42 43} Seven out of the 10 SSPC members were also members of the SAC.^{44 45 46} Further, nine of the 10 members of the SSPC are serving or retired senior military officers,⁴⁷ demonstrating the military’s continuing attempts to seize control. All are sanctioned in at least one of the aforementioned jurisdictions.^{48 49 50 51 52 53 54 55}

For example, General Ye Win Oo, secretary of the SSPC and former joint secretary of the SAC, was sanctioned by the US on February 11, 2021, along with former SAC and current SSPC member Aung Lin Dwe.⁵⁶ On May 17, 2021, the US sanctioned the junta Border Affairs Minister and current SSPC member Tun Tun Naung.⁵⁷ Current SSPC member Maung Maung Aye was also sanctioned by the US on October 31, 2023 in his capacity as Chief of General Staff for the Myanmar Army, Navy and Air Force.⁵⁸

Analysis of SSPC membership and sanctions status⁵⁹



Since the establishment of the SSPC on July 31, 2025, the Myanmar military has continued to carry out brutal attacks on civilians with indiscriminate airstrikes and shelling, arbitrary arrests, and torture.⁶⁰ One of the many incidents documented by independent media organizations and civil society groups soon after July 31 was an airstrike on August 17 on Mawchi, Karenni State, killing at least 32 civilians.⁶¹ Later in August, airstrikes on Mrauk-U, in Arakan State, killed at least 12 people, including children.⁶² More recently, on December 10, 2025, which is commemorated globally as Human Rights Day, the military junta launched an airstrike on Mrauk-U hospital that reportedly killed 33 civilians, including healthcare workers, patients, and a baby.⁶³ These attacks are continuing with total impunity and show no sign of abating as the junta proceeds with its planned sham election.

Based on the significant overlap between SAC and SSPC in leadership and function, and the military's continued gross violations of international human rights and humanitarian law, there are clear grounds on which the SSPC could be sanctioned.⁶⁴ First, sanctioning authorities can recognize the SSPC as an alias of SAC, given that the new organization is substantially the same as the old, including its senior figures and function. The designation could be updated to reflect the change, adding the name of the SSPC to sanctions lists.

The SSPC could also be designated in its own right, a separate but equally valid option. The SSPC's top three positions—chair, vice-chair, and secretary—have each been sanctioned in the US, the UK, the EU, Canada, New Zealand and Australia. Further, other members have been sanctioned by one or more jurisdictions.^{65 66 67 68 69 70 71 72 73}

Therefore, the SSPC is controlled by sanctioned persons, which is grounds for designation. Depending on the jurisdiction, separate additional grounds for sanctioning the SSPC could be considered. In the US, for example, the SSPC could be designated under a number of provisions in Executive Order 14014, including as an entity responsible or complicit in “actions or policies that threaten the peace, security or stability of Burma” and as an entity that is “a political subdivision, agency, or instrumentality of the Government of Burma.”⁷⁴ It could also be designated under the Global Magnitsky sanctions program based on continuing human rights violations.

To prevent sanctions from being circumvented, authorities should promptly add the SSPC to sanctions lists. The institutional redesign carried out by the junta in July has created a loophole to allow for the circumvention of sanctions.⁷⁵ There are real risks that individuals and entities who do not find the SSPC on the sanctions list—or who are looking for a loophole to provide services to the Myanmar junta—may proceed to engage and transact with the new entity, as it is not technically designated. Jurisdictions that designated the SAC should take swift action to designate the SSPC or amend the existing SAC listing to include the SSPC as an alias.

Newly Acquired Lobbyists Despite Sanctions

Immediately after the NDSC dissolved the SAC and formed the SSPC, two US lobbying firms transacted with entities controlled by the Myanmar junta for the purpose of influencing the US government on the junta's behalf: DCI Group AZ, LLC, a Washington DC K Street public relations firm, and the McKeon Group that is based in Alexandria, Virginia.^{76 77} Based on the membership of the SSPC, the two lobbying firms appear to be indirectly providing services to a heavily sanctioned junta. These lobbying efforts effectively benefit sanctioned individuals and entities and aid the military's ongoing attempts to consolidate power.

On August 1, 2025, the day after the change from SAC to SSPC, DCI Group submitted a Foreign Agent Registration Act (FARA) filing that disclosed its agreement to work for the "Republic of Myanmar's Ministry of Information", a branch of the junta that was controlled by the SAC and now by the SSPC and serves as its means of communicating official positions.^{78 79} Although not itself directly sanctioned, the junta's



Ministry of Information has been described as the regime's propaganda machine by independent scholars and civil society organizations.^{80 81} The FARA filing's Client Services Agreement disclosed a package of \$3 million in annual compensation, with the first payment of \$1.5 million due on the agreement's effective date of July 31, 2025.⁸²

According to the filing, DCI Group agreed to "provide public affairs services [. . .] to rebuilding relations between the Republic of the Union of Myanmar and the United States, with a focus on trade, natural resources, and humanitarian relief."⁸³ This mandate involves high-risk activities and lobbying that benefits sanctioned entities because many of the junta-controlled state-owned entities in Myanmar engaged



in trade and the exploitation of natural resources are sanctioned or deemed high-risk by US agencies.⁸⁴ For instance, the Office of Foreign Assets Control (OFAC) sanctioned junta-controlled state-owned enterprises Myanma Timber Enterprise and Myanmar Pearl Enterprise in April 2021,⁸⁵ while in October 2023 OFAC prohibited the provision of financial services to Myanma Oil & Gas Enterprise.⁸⁶

Notably, DCI Group included contractual language in its Client Agreement suggesting that no sanctioned party would be associated with or even benefit from its effort to rebuild relations.

The FARA filing stated:

“Neither Client, nor, to Client’s knowledge, any representatives of Client or any third party associated with Client in the fulfillment of Client’s obligations or the Services sought under this Agreement, or any beneficiary of the Services: (1) is blocked pursuant to U.S. economic sanctions, including, but not limited to, through inclusion on any applicable OFAC sanctions list; (2) is owned or controlled, directly or indirectly, by any person who is blocked pursuant to U.S. economic sanctions; [. . .] or (4) is otherwise a restricted party under any U.S. economic sanctions [. . .].”⁸⁷

DCI Group made these representations despite effectively committing to advance the interests of a military junta subject to numerous sanctions in multiple jurisdictions. If DCI Group is successful in rebuilding relations between the US government and the Myanmar junta, it would seem to benefit a number of sanctioned individuals and entities.

DCI Group did require that the client ensure that no blocked funds were used for payment and that no transfer of monies occurred through a blocked third party. The agreement even included a provision that requires the junta’s Ministry of Information to specifically indemnify DCI Group for all damages related to sanctions violations, in addition to a general indemnity clause.⁸⁸ It is noteworthy that these provisions are not included in contracts with other DCI Group clients. The Sentry and Justice For Myanmar’s review of additional Client Agreements entered into by DCI Group, available in an online FARA search of DCI Group records, found that none of the reviewed agreements included any provisions related to sanctions or sanctions indemnity.^{89 90}

DCI Group did not reply to a request for comment.

A separate FARA filing on August 22, 2025, shows that the McKeon Group contracted with the junta-controlled Myanmar embassy in Washington, DC on August 1, 2025. The first payment of \$180,000 was made the same day.⁹¹ Although not directly sanctioned, the embassy operates under the junta’s Ministry of Foreign Affairs, which is controlled by the SSPC—previously SAC—and Min Aung Hlaing.⁹² Per the agreement, McKeon Group is “working on developing diplomatic relationships between the Embassy and the US Government” with a focus on “US Congress and the Administration-State Dept.”⁹³

If McKeon Group is successful in developing diplomatic relationships, it would seem to benefit a number of the many sanctioned individuals and entities related to the Myanmar junta.

McKeon Group did not reply to a request for comment.

The timing of the two contracts, both dated within a day of the change from SAC to SSPC, indicates that both firms negotiated with SAC/SPCC-controlled entities and are effectively lobbying on behalf of a heavily-sanctioned junta, thus supporting its bid to consolidate power and enabling the Myanmar military’s continued war against the people of Myanmar.

Recommendations

The US, the UK, the EU, Canada, Australia, and other likeminded jurisdictions

Ensure SSPC is sanctioned. Jurisdictions that have sanctioned SAC should update their designation to cover SSPC. Other jurisdictions should impose sanctions on SSPC. This is necessary as a response to the junta's sham election, to prevent loopholes created through the dissolution of SAC and creation of SSPC, and to prevent the SSPC's access to the international financial system.

Prioritize targeted network sanctions. The US, the UK, the EU, Canada, Australia, and other likeminded jurisdictions should prioritize applying coordinated targeted network sanctions via Global Magnitsky-style, Myanmar-specific, or other relevant sanctions regimes against enablers of the Myanmar junta, both those already sanctioned by some authorities and others that are not currently the subject of any sanctions. These sanctions should be multilateral to avoid sanctions gaps between jurisdictions and ensure maximum impact.

Increase enforcement. Ensure sanctions are rigorously enforced and violations are investigated in full. Cooperate with civil society actors that can provide evidence of sanctions violations.

International Community

Denounce the sham election. Governments and regional and global bodies should clearly reject the sham election and its results, unequivocally refuse the provision of any material or symbolic support to the junta for its sham election, and block efforts from the junta to use the sham election as a way to gain legitimacy internationally.

Private Sector

End contracts with the military junta and entities under its control. Professional service firms, including lobbying firms DCI Group and McKeon Group, and other private sector actors with ongoing business with the junta and entities under its control, should terminate those relationships due to sanctions and reputational risks. Any professional service firms and other private sector actors considering new business with the junta and entities under its control should refrain from doing so until such time that there is a legitimate democratic government in Myanmar.

Exercise enhanced due diligence. Financial institutions, professionals, and other private sector actors that transact directly or indirectly with conflict-affected Myanmar should exercise enhanced due diligence. This due diligence should identify higher-risk entities and individuals linked to the Myanmar junta and determine whether they are acting as enablers.

Leverage information from civil society. Financial institutions and other private sector actors, as applicable, should add individuals and entities to their internal filters that civil society and nongovernmental organizations have identified as acting on behalf of the junta, including those named in this report, even if not yet sanctioned. These institutions and actors should assess whether they have any client relationships or other exposure and the extent of the risk.

Endnotes

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