

**Working Group Paper #5**

**The Case for Designating the Russian Federation  
as a  
State Sponsor of Terrorism**

The International Working Group on Russian Sanctions

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<https://fsi.stanford.edu/working-group-sanctions>

The International Working Group on Russian Sanctions<sup>1</sup> aims to provide expertise and experience to governments and companies around the world by assisting with the formulation of sanctions proposals that will increase the cost to Russia of invading Ukraine and support democratic Ukraine in the defense of its territorial integrity and national sovereignty. The views expressed in this paper represent our own independent, nonpartisan collective assessments for how best to use economic leverage to end Putin’s war. This working paper expands on an idea first presented in our original Action Plan, a proposal to designate Russia as a state sponsor of terrorism. The ideas in this paper have been informed by additional memos and papers on our website.<sup>2</sup>

## **I. Summary**

The Action Plan on Strengthening Sanctions against the Russian Federation outlined a comprehensive list of sanctions in many sectors as well as on a wide range of Russian, Belarusian, and other individuals. One recommendation in that Action Plan was for countries to label Russia as a State Sponsor of Terrorism (SST), and for the U.S. and Canadian governments, in particular, to make such a designation in accordance with their existing laws. This new Working Paper expands the case for doing so now. Tragically, the evidence for supporting this designation has grown even stronger since the publication of our Action Plan last April.

The case for making this designation should start with the specific step of determining whether Russia meets the criteria of being a state that sponsors terrorism, either in terms of the specific laws of the U.S., Canada, and other countries or in terms of other broadly accepted public views about terrorism. While this might seem an obvious step, we believe there is value to addressing explicitly and on its own merits the core question of whether Russia is a terrorist-sponsoring state. We answer this first question in the affirmative.

The second question then is to assess the benefits versus the costs of a formal SST designation, especially by the U.S. Some critics, for example, have argued against a formal SST designation by claiming that it is unnecessary, since the additional punishments would allegedly not go that much beyond the sanctions already in place. Conversely, others have argued that the punishments associated with an SST designation would be too severe, leading to possible unintended consequences such as a complete break in U.S.-Russia diplomatic relations or hindrances to providing humanitarian relief in Ukraine.

We have assessed these risks and have proposed potential mitigation strategies for many of them. If some of the punishments in U.S. law for being a State Sponsor of Terrorism are not perfectly optimal, having been developed haphazardly over time and for different circumstances, then they should be adjusted with waivers, additional sanctions, or other mechanisms, rather than used as a justification to avoid speaking truth about the behavior of the Russian government in

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<sup>1</sup> All members of this working group participate in their private capacities, but we have consulted with numerous government officials, including with the Government of Ukraine.

<sup>2</sup> Our aim was not to produce a consensus document, but instead to provide a menu of possible additional measures to be considered by governments, multilateral institutions, and private actors. The implications of every sanction have not been thoroughly analyzed, and not everyone necessarily agrees with every specific action proposed. This consultation process helps to inform our views, but our members express independently held opinions and do not take direction from or act at the behest of the government of Ukraine or any other person or entity.

Ukraine. Other countries without existing SST statutes and associated punishments can also speak the truth about Russian terrorism and then implement new sanctions. Truth matters. The U.S. and other countries in the sanctions coalition should clearly and urgently call out Russia for what it is: a State Sponsor of Terrorism. Such a designation would not only formalize what most observers can see as being obviously true, i.e., that Russia is terrorizing civilians in Ukraine, but it also would substantially increase the scale, scope, and effectiveness of the sanctions imposed on the Putin regime.

## **II. Is Russia a State Sponsor of Terror?**

There is no single international checklist of the criteria for determining whether a state's actions qualify for being designated a State Sponsor of Terrorism. The three main U.S. statutes that authorize the Secretary of State to make an SST designation all refer to governments of countries that have “repeatedly provided support for acts of international terrorism”, but they do not clarify the definition of terrorism itself. As codified elsewhere in U.S. law, though, and echoed in the legal codes of other countries, as well as in the definitions found in multiple international agreements and used by many multilateral institutions, the essence of terrorism can be well summarized as “premeditated, politically motivated violence perpetrated against noncombatant targets.”<sup>3</sup>

Russia’s actions in Ukraine today are most certainly “premeditated, politically motivated violence perpetrated against noncombatants.”<sup>4</sup> In practice, Russia’s crimes in Ukraine far exceed simply “sponsoring terrorism,” since the main perpetrator of these terrorist acts is the Russian armed forces, a core institution of the Russian state, rather than a non-state actor. Russia’s crimes reflect a grotesque indifference to the rules and laws of war that constrain the exercise of military power, as seen for instance in the widespread use of torture on and summary executions of Ukrainian prisoners of war. That is because these acts are not one-off instances carried out by rogue elements of the Russian armed forces, but instead are designed and conducted with the specific intent of terrorizing the Ukrainian population. They are actions that constitute state sponsorship of terrorism.

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<sup>3</sup> This phrase is included in Section 140 of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989, as quoted in Congressional Research Service, State Sponsorship of Acts of International Terrorism – Legislative Parameters: In Brief, No. R4335 (CRS: Washington, DC, May 4, 2021), 4. In this particular legislation, which established requirements for an annual report to Congress, the definition also includes the additional term “...by subnational groups or clandestine agents”. This distinction between state and non-state actors, though, is not a general requirement in defining terrorism, either in the three main U.S. statutes authorizing the Secretary of State to designate a country as an SST or in U.S. practice (e.g., the Iranian Islamic Revolutionary Guard Corps is currently designated by the U.S. as a foreign terrorist organization). Other actions associated with state sponsorship of terrorism in U.S. law include a state (1) allowing its territory to be used as a hideout from extradition for terrorist activities; (2) providing weapons, explosive devices, or substances for terrorist activities; (3) planning, directing, training, or assisting in the implementation of terrorist activities; and (4) providing financial support for terrorist activities; (4) willful aid or abet the international proliferation of nuclear explosive devices, (5) ...in acquiring unsafeguarded special nuclear material, or (6) ...to use, develop, produce, stockpile, or otherwise acquire chemical, biological, or radiological weapons

<sup>4</sup> <https://www.csis.org/analysis/massacres-executions-and-falsified-graves-wagner-groups-mounting-humanitarian-cost-mali>

Since invading Ukraine on February 24, 2022, Vladimir Putin, his generals, his intelligence officers, his irregular forces, and other agents of the Russian state have deliberately and repeatedly targeted Ukrainian civilians as a means to terrorize the Ukrainian population. By killing Ukrainian civilians and threatening others with death, injury, or forcible deportation to Russia, the Kremlin aims to scare Ukraine into submission.

Both the number of deaths and the methods of violence perpetrated by the Russians have been horrifying. Russia's armed forces frequently fire missiles at obviously civilian targets. In the first months of the war, tens of thousands of Ukrainian civilian casualties have been reported, as well as destruction of a significant number of civilian buildings, structures, and vehicles across the country.<sup>5</sup> In the Ukrainian town of Bucha, international experts found evidence of torture, waterboarding, sexual violence, and other atrocious human rights violations. During the siege of Mariupol, the Russian government engineered a major humanitarian crisis that killed over 22,000 civilians and destroyed 95% of the city. In June 2022, Russians fired missiles at a shopping mall in Kremenchuk, killing a dozen people and injuring dozens more.<sup>6</sup> By September, they had damaged or destroyed at least 131,300 units of civilian housing, 188,100 vehicles, 934 education facilities, and 2,472 healthcare facilities.<sup>7</sup> After liberating Izyum in September 2022, Ukraine's armed forces unearthed over 400 unmarked graves of Ukrainian civilians. To date, more than 30,000 war crimes have been recorded, more than 90% of them committed against the civilian population and/or aimed at destroying civilian facilities. There is also evidence that paramilitary groups affiliated with and empowered by the Russian states have carried out acts of torture in Ukraine as well.<sup>8</sup> In addition, over 1.3 million Ukrainian citizens and children had been deported to Russia against their will by Russian occupying forces just through July.<sup>9</sup> The severity of these crimes has been affirmed by the United Nations Human Rights Council's Independent International Commission of Inquiry on Ukraine.<sup>10</sup>

Most recently, in response to Ukraine's counteroffensive in the Kharkiv region in September, Russian armed forces attacked critical infrastructure to deny Ukrainians electricity and water. Furthermore, Russian missiles even attacked a Ukrainian dam in Kryvyi Rih, with the intention to drown Ukrainian civilians. On September 19, 2022, a Russian missile struck close to Ukraine's second-largest nuclear power station in Mykolaiv. While the Ukrainian army attacks Russian military targets, the Russian army attacks Ukrainian civilian targets. Russian armed forces and intelligence officers have terrorized Ukrainian citizens to participate against their will in sham referenda that the Kremlin is using as pretext to annex more Ukrainian territory.

Currently, the United States has designated four countries as state sponsors of terrorism: North Korea, Syria, Iran, and Cuba. (The list previously included Iraq, Libya, South Yemen, and

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<sup>5</sup> <https://news.un.org/en/story/2022/09/1126391>

<sup>6</sup> <https://www.cbc.ca/news/world/ukraine-invasion-day-124-1.6502606>

<sup>7</sup> <https://www.nytimes.com/interactive/2022/03/23/world/europe/ukraine-civilian-attacks.html>

<sup>8</sup> <https://www.laender-analysen.de/ukraine-analysen/272/human-rights-watch-ukraine-executions-torture-during-russian-occupation-ausschnitt/>. The Russian government and agents affiliated with the Russian state also have carried out terrorist acts in other countries, particularly in Syria. Our focus in this paper, however, is limited to Ukraine.

<sup>9</sup> <https://www.cnn.com/2022/07/14/politics/osce-report-russia-war-crimes/index.html>

<sup>10</sup> <https://www.ohchr.org/en/statements/2022/09/update-chair-independent-international-commission-inquiry-ukraine-51st-session>

Sudan). Canada also has an SST mechanism and has designated Iran and Syria as state sponsors of terrorism since 2012.<sup>11</sup> The European Council similarly maintains a list of persons, groups, and entities involved with terrorist acts that are subject to sanctions and other restrictive measures.<sup>12</sup> Currently, 13 persons and 21 groups and entities on the list have their funds and other financial assets in the European Union frozen. Furthermore, European Union persons and entities are restricted from making funds available to them.

By any standard, Russian support for terrorist acts in Ukraine today is comparable to those states already on the U.S and Canadian lists. Through its actions in their war against Ukraine, the Russian Federation has met or exceeded any reasonable legal or policy threshold for designating as a state sponsor of terrorism with respect to other nations and entities currently holding the designation. War crimes versus acts of terrorism are distinctions without a difference. The kind, extent, and purpose of premeditated, politically motivated violence that the Russian state is deploying against Ukrainian noncombatants is shocking. It demands a response. Therefore, as empowered by Section 1754(c) of the National Defense Authorization Act for Fiscal Year 2019, Section 40 of the Arms Export Control Act, and Section 620A of the Foreign Assistance Act of 1961, the U.S. Secretary of State should designate the Russian Federation as a state sponsor of terrorism. The Government of Canada should make a similar designation. Other countries in the sanctions coalition, as well as the European Union, do not have formal designations of state sponsors of terrorism. However, these countries should issue declarations or pass resolutions stating the same about Russia's terrorist methods, and then implement a new sanctions regime commensurate to what the United States and Canada would do by making this designation. In August 2022, the Latvian parliament, the Saeima, "recognized Russia's violent against civilians in pursuit of political aims as terrorism..."<sup>13</sup> So did Lithuania.<sup>14</sup> It is time for other countries to do the same. Unity on sanctions is an absolute must.

### **III. Implications of the SST Designation**

#### **A. Restrictions on Transactions**

If the United States designates Russia a state sponsor of terrorism, it will become illegal for U.S. persons and entities to engage in financial transactions with the Government of Russia, thereby imposing high scrutiny on transactions with all state-owned banks, state-owned enterprises, and government-related individuals. Importantly, this high scrutiny would yet allow for humanitarian and food-related transactions which can pass verification by U.S. authorities. (Of course, according to U.S. law, the executive branch is empowered to issue exemptions that serve U.S. national interests. We discuss these exemptions below.) This designation would also increase pressure to add Russia to the blacklist of the Financial Action Task Force (FATF).<sup>15</sup> As

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<sup>11</sup> <https://laws.justice.gc.ca/eng/acts/S-18/page-1.html#h-440054>

<sup>12</sup> <https://www.consilium.europa.eu/en/policies/fight-against-terrorism/terrorist-list/>

<sup>13</sup> <https://apnews.com/article/russia-ukraine-latvia-terrorism-government-and-politics-3bafb28ab5e1bec6327311aa810fbf55>.

<sup>14</sup> <https://www.delfi.lt/ru/news/politics/sejm-litvy-priznal-rossiyu-terroristicheskim-gosudarstvom.d?id=90178683>

<sup>15</sup> See details [at this link](#)

of January 2022, North Korea and Iran are on the FATF blacklist. As we suggested in our Action Plan, we strongly support adding Russia to that list.

An SST designation by the U.S. would restrict foreign assistance from the United States and from organizations in which the U.S. is a member; ban all arms-related exports and sales; strengthen even further the controls over exports, re-export, and transfer of dual-use items; and put in place additional financial restrictions. Presently, especially after Putin closed down the Russian office of the U.S. Agency for International Development in 2012, the United States does not provide economic assistance to Russia. Export controls on technology, however, have the scope to increase substantially.

### **B. The Loss of Sovereign Immunity**

Countries on the U.S. SST list lose the so-called executive and judicial immunity related to their terrorist acts, which would carry the real possibility of the Russian Federation being brought to justice in the courts of other countries. For example, this designation would allow U.S. nationals and employees to sue Russia for money damages or material compensation for personal injury or death caused by the Russian state's terrorism. U.S. domestic courts can award money damages to victims of terrorism. Frozen and diplomatic assets of foreign states can be attached to satisfy a judgment for claims. Like measures imposed on other state sponsors of terrorism, this designation could result in blocking the property of the Government of Russia, state-owned or controlled banks and enterprises, and Russian financial institutions, as well as prohibiting transactions with these entities and persons. Some experts argue that SST could lead to removal of the sovereign immunity from the assets of the Central Bank of Russia. However, this action would not happen automatically and could be mitigated by additional actions, discussed below. Designating the Russian Federation as a state sponsor of terrorism also would trigger increased scrutiny of the nefarious activities of all Russian government entities, including those of the Russian intelligence services.

### **C. Secondary Sanctions**

Today's body of legislation and precedents allows the U.S. to impose sanctions on third parties for various kinds of transactions with an SST in the form of blocking of property (for individuals) or imposition of blocking sanctions on its banks. For instance, regarding Syria and Iran, the U.S. adopted individual packages of secondary sanctions on the banks and individuals engaged in transactions with "terrorists" outside of the United States. Therefore, this designation for Russia would make it easier and more likely for the U.S. to impose secondary sanctions on third parties transacting with the Russian state and private sector entities. With the SST designation in place, the U.S. and its allies could impose financial and trade sanctions on any country that continues to cooperate with the Russian state. This threat of secondary sanctions would increase the probability of compliance with sanctions already in place, thus enhancing their credibility and enforceability.

### **D. Private Sector and Individual Sanctions**

The SST designation would have the effect of immediately extending U.S. financial sanctions to thousands of people whom we have previously recommended for individual sanctions because of their government positions, but who have yet to be sanctioned directly. The designation would also greatly increase the scrutiny of many Russian private sector entities and individuals by international counterparties. Potential business partners would need to take extra care in their due diligence and Know-Your-Customer (KYC) research to ensure that Russian citizens with whom they may be considering doing business are not associated with or controlled by the state or a state-owned enterprise, or otherwise involved in an attempt to evade sanctions. Many international companies might simply decide that the extra costs and risks of continuing to do business with Russian partners were simply not worth it, amplifying the formal effects of the designation in isolating the Russian economy.

The designation would also trigger a number of heightened security measures for when Russian individuals enter the United States.

### **E. Symbolic Impact**

Finally, the SST designation carries an important symbolic meaning. It would provide official recognition confirmed by the world's most credible sanctioning institutions of what to date is largely self-evident, but which remains unformalized: Russia is a state sponsor of terrorism. The designation would bring more global attention to the nature of the Russian regime and the atrocities and terror that it has committed against innocent Ukrainian civilians. The importance of symbolic acts to the Kremlin is evidenced by the record of Putin's concerns with Russia's and his own image (e.g., the outrage expressed by the Russian government over not being invited to Queen Elizabeth II's funeral.) The notion of being an outright pariah state is likely to be distasteful to ordinary Russians, which could raise the attention within the Russian population to the terrorist actions taken by their government.

## **IV. Acknowledging the Risks**

We understand the complicated diplomatic, legal, and economic implications for the U.S. and potentially for other members of the sanctions coalition in imposing this designation on the Russian Federation. We acknowledge, for instance, that the SST designation could delay food exports and potentially jeopardize deals to move goods through the Black Sea.<sup>16</sup> This is an important risk to proactively consider and mitigate. The SST designation could also trigger further disruptions of bilateral relations between the United States and Russia, including the possibility of a formal break or suspension in diplomatic relations. Opening the possibility of private lawsuits by American citizens against the Russian Federation carries the risk of draining some resources that could otherwise contribute toward the reconstruction of Ukraine.

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<sup>16</sup> <https://www.reuters.com/world/biden-will-not-declare-russia-state-sponsor-terrorism-white-house-2022-09-06/>

We also acknowledge and appreciate the enormous success that the free world has achieved in sanctioning Russia already. As a result, some U.S. officials have argued that the U.S. has already implemented a comprehensive sanctions regime commensurate in scope to what would be achieved by adding the SST designation. With this assessment, we disagree. Terrific work has been done to implement sanctions that make it harder for Putin to continue his invasion and annexation of Ukraine. But that invasion has not ended. Annexation proceeds. Nor have Russian acts of terrorism ended. So now is the moment to ratchet up economic isolation of Russia as a necessary means to help end this war. Given the costs of witnessing terrorist acts and doing nothing in response, we believe that the benefits of proceeding with some sort of SST designation for the Russian Federation outweigh the risks.

Moreover, it is important to note that the laws allowing for the SST designation in the United States have embedded within them sufficient flexibility to construct effective mitigation strategies for most of these concerns, as we outline in the next section.

## **V. Mitigation Options and Second-Best Steps**

Each state sponsor of terrorism has its own unique characteristics. Therefore, in designating the Russian Federation as a sponsor of state terrorism, the U.S. Secretary of State could announce several clarifications to the designation that would protect American national interests. American legislation regarding this designation empowers the U.S. president with substantial waiver authority for national security interests or for humanitarian concerns. Those authorities could be used in precise ways to maximize pressure on the Russian Federation without jeopardizing American interests, including the U.S. objective of assisting the Government of Ukraine economically.

First, the U.S. Secretary of State could add a waiver to the state sponsor of terrorism designation that would allow contacts with Russian diplomats when American national interests were being advanced. For example, even while Iran was designated as a state sponsor of terrorism, Obama administration officials negotiated directly with Iranian diplomats to conclude the Joint Comprehensive Plan of Action (JCPOA). Biden administration officials are communicating indirectly with their Iranian counterparts today. Even while North Korea was designated as a state sponsor of terrorism, President Trump met with the leader of this terrorist state, as did his lower-level officials. An amendment to the designation also could give American diplomats blanket authority to meet with Russian diplomats within multilateral organizations. Cooperation with Russian actors on joint humanitarian efforts should also be allowed and stipulated as an exemption in the SST designation.

Second, the U.S. Secretary of State could choose to stipulate that this new designation is in response only to Russia's most recent terrorist attacks in Ukraine, thereby limiting the number of law suits for damages that could be filed against the Russian state related to earlier acts of terrorism. As spelled out in U.S. Senate Resolution 623 from September 2022 and mentioned earlier in this paper, Putin and his government have committed acts of terrorism before invading



Ukraine in 2022, and elsewhere in the world.<sup>17</sup> The U.S. Secretary of State could, however, elect to keep the focus on the atrocities of the current war.

Third, to reduce fears that American claimants in the U.S. might drain some Russian government assets currently being held in the United States and other banks in the democratic world, the U.S. government could stipulate that these assets are exempt from potential lawsuits and instead will be used for Ukrainian reconstruction.

Fourth, because sanctions are sticky, the Biden administration could work with the U.S. Congress to pre-commit to the conditions under which the designation would be lifted.<sup>18</sup> For instance, there could be a condition that if Russia's armed forces left Ukraine and therefore stopped terrorizing the Ukrainian population, then the designation would be lifted. The U.S. House of Representative and the Senate could commit to this trigger for lifting the designation in a joint resolution. Doing so in advance might create greater incentives for Putin to end his war. The United States government has extensive experience in lifting the SST designation for other countries. At the appropriate moment, it could do so again with Russia. Instituting specific periods for review of the designation (e.g., within three months or six months) can further concretize the steps that Russia needs to take to rehabilitate itself, with preset deadlines helping to anchor the timeline.

Fifth, the U.S. Secretary of State could announce a date in the future when the United States plans to announce this designation unless Russia's forces change their terroristic tactics. Although this is unlikely to make a material difference, doing so would provide incentives for Putin and his generals to alter the ways in which they conduct their war in Ukraine. Setting a future date for this designation to go into effect also would give American companies time to disengage from Russia in less disruptive ways.

Sixth, if after all these considerations the SST designation is still considered to be too difficult to implement, the United States and other countries could designate the Armed Forces of the Russian Federation as a foreign terrorist organization.<sup>19</sup> Or the United States and other democratic countries could designate the alleged "people's republics" of Donetsk and Luhansk as foreign terrorist organizations.

Seventh, as a preliminary step towards an SST designation, the United States and other members of the FATF could vote at the next FATF plenary session in October 2022 to exclude Russia from the FATF. Excluding Russia from FATF would open the door to its blacklisting, which will result in: (1) neutralizing the sanctions evasion mechanisms involving the financial sector (most mechanisms), including through third countries, as FATF rules affect not only the main currencies, but rather the overall global banking system; (2) undermining Russia's international trade, as it will be unacceptably risky to make any import-export transactions with the country, no matter what company or bank is involved; and (3) significantly decreasing foreign direct investment into Russia by compelling remaining investors to leave the country due

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<sup>17</sup> <https://www.congress.gov/bill/117th-congress/senate-resolution/623/text>

<sup>18</sup> Of the three statutes governing this designation, only the Arms Export Control Act (AECA) gives Congress the authority to block delisting. Previous administrations have delisted countries without Congressional blocking actions.

<sup>19</sup> <https://www.state.gov/foreign-terrorist-organizations/>

to increasing operational and compliance problems, as well as costs of transferring funds into and out of Russia.

Eighth, a final option would be for the United States, Canada, and the rest of the sanctions coalition to issue a joint declaration identifying the Russian government as a perpetrator of terrorist acts against Ukrainian civilians, and then enacting a new sweeping package of comprehensive sanctions as a commensurate response to these horrific acts, but without formally designating Russia as a state sponsor of terrorism.

What is not an option is becoming numb or indifferent to Russia's terrorist acts in Ukraine.

## **VI. Conclusion**

Given that Russia's continued atrocities committed inside Ukraine are designed deliberately to terrorize the Ukrainian people, the designation of the Russian Federation as a State Sponsor of Terrorism is a commensurate, proportional response. Failure to do so would be an inadequate response. Unfortunately, despite Ukraine's successes to date in resisting the invasion and the impacts from the extensive sanctions implemented to date, Russian military and irregular forces are continuing to terrorize Ukrainian civilians every day. It is therefore imperative, and urgent, for the free world to ratchet up sanctions even further as a means to constrain Putin's ability to continue his invasion, stop his annexation, and increase pressure on Russia to end the war and withdraw from Ukraine.

The time for incrementalism is over. Small tweaks and limited expansions of existing sanctions are an inappropriate response to the ongoing horrors of Putin's barbaric attacks against Ukrainian civilians. It is time to ratchet up the pressure on Russia dramatically. Designating the Russian Federation as a State Sponsor of Terrorism would do just that.

*Note: The inclusion of affiliations is for identification purposes only and does not represent an endorsement of shared views with the co-signer. Signature here does not imply that every signatory agrees with each and every idea proposed in this paper, but instead agrees generally with the arguments and evidence presented.*

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