

continues,” Amnesty continued, and “[w]ork must be done to uphold freedom of expression and to unwind the impact of the ‘chilling effect’ that Assange’s treatment has had on media freedom worldwide.”⁵²

USE OF FORCE, ARMS CONTROL, AND NON-PROLIFERATION

The United States and Twenty-Three Other Countries Enter into Bilateral Security Agreements with Ukraine

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Since the beginning of 2024, the United States¹ and twenty-three other countries have entered into bilateral security agreements with Ukraine.² Additional pacts are under

⁵² *Id.*

¹ See Bilateral Security Agreement Between the United States of America and Ukraine (June 13, 2024), at <https://www.whitehouse.gov/briefing-room/statements-releases/2024/06/13/bilateral-security-agreement-between-the-united-states-of-america-and-ukraine> [https://perma.cc/25PX-Q2RY] [hereinafter U.S.-Ukraine Bilateral Security Agreement].

² See Agreement on Security Cooperation and Long-Term Support Between the Kingdom of Belgium and Ukraine (May 28, 2024), at <https://www.president.gov.ua/en/news/ugoda-pro-spivrobitnictvo-u-sferi-bezpeki-ta-dovgostrokovu-p-91169> [https://perma.cc/885A-K2BE]; Agreement on Security Cooperation Between Canada and Ukraine (Feb. 24, 2024), at https://www.international.gc.ca/world-monde/issues_developpement-enjeux_developpement/response_conflict-reponse_conflits/crisis-crisis/agreement-ukraine-accord.aspx?lang=eng [https://perma.cc/KTK3-FPLA]; Agreement on Security Cooperation and Long-Term Support Between Ukraine and the Czech Republic (July 18, 2024), at <https://www.president.gov.ua/en/news/ugoda-pro-spivrobitnictvo-u-sferi-bezpeki-ta-dovgostrokovu-p-92237> [https://perma.cc/4GQQ-RMGT]; Agreement on Security Cooperation and Long-Term Support Between Ukraine and Denmark (Feb. 23, 2024), at <https://www.president.gov.ua/en/news/ugoda-pro-spivrobitnictvo-u-sferi-bezpeki-ta-dovgostrokovu-p-89185> [https://perma.cc/A88Z-G9P2]; Agreement on Security Cooperation and Long-Term Support Between Ukraine and Estonia (June 27, 2024), at <https://www.president.gov.ua/en/news/ugoda-pro-spivrobitnictvo-u-sferi-bezpeki-ta-dovgostrokovu-p-91793> [https://perma.cc/E69F-X8F7]; Agreement on Security Cooperation and Long-Term Support Between Ukraine and the Republic of Finland (Apr. 3, 2024), at <https://www.president.gov.ua/en/news/ugoda-pro-spivrobitnictvo-u-sferi-bezpeki-ta-dovgostrokovu-p-90021> [https://perma.cc/87CJ-YZZ9]; Agreement on Security Cooperation Between France and Ukraine (Feb. 16, 2024), at <https://www.elysee.fr/en/emmanuel-macron/2024/02/16/agreement-on-security-cooperation-between-france-and-ukraine> [https://perma.cc/3MV6-NTZ3]; Agreement on Security Cooperation and Long-Term Support Between the Federal Republic of Germany and Ukraine (Feb. 16, 2024), at <https://www.bundesregierung.de/resource/blob/998352/2261062/d84fa168bdd3747913c4e8618bd196af/2024-02-16-ukraine-sicherheitsvereinbarung-eng-data.pdf> [https://perma.cc/XM3V-8V9A]; Agreement on Security Cooperation and Long-Term Support Between Ukraine and Iceland (May 31, 2014), at <https://www.president.gov.ua/en/news/ugoda-pro-spivrobitnictvo-u-sferi-bezpeki-ta-dovgostrokovu-p-91237> [https://perma.cc/VC2Y-YV62]; Agreement on Security Cooperation Between Ukraine and Italy (Feb. 24, 2024), at <https://www.president.gov.ua/en/news/ugoda-pro-spivrobitnictvo-u-sferi-bezpeki-mizh-ukrayinoyu-ta-89245> [https://perma.cc/S9YF-NZ2U]; Accord on Support for Ukraine and Cooperation Between Ukraine and the Government of Japan (June 13, 2024), at <https://www.president.gov.ua/en/news/ugoda-pro-pidtrimku-ukrayini-ta-spivrobitnictvo-mizh-ukrayin-91481> [https://perma.cc/JB2Z-AYFD]; Agreement Between Ukraine and the Republic of Latvia on Long-Term Support and Security Commitments (Apr. 11, 2024), at <https://www.president.gov.ua/en/news/ugoda-mizh-ukrayinoyu-ta-latvijskoyu-respublikoyu-pro-dovgos-90189> [https://perma.cc/8VGG-ZRWM]; Agreement on Security Cooperation Between Ukraine and the Republic of Lithuania (June 27, 2024), at <https://www.president.gov.ua/en/news/ugoda-pro-spivrobitnictvo-u-sferi-bezpeki-mizh-ukrayinoyu-ta-91809> [https://perma.cc/S3QF-A3X7]; Agreement on Security Cooperation and Long-Term Support Between Ukraine and the Grand-Duchy of Luxembourg (July 10, 2024), at <https://www.president.gov.ua/en/news/ugoda-pro-spivrobitnictvo-u-sferi-bezpeki-ta-dovgostrokovu-p-92057> [https://perma.cc/8PFG-T2TJ]; Agreement on Security Cooperation Between the Netherlands and Ukraine (Mar. 1, 2024), at

negotiation.³ The agreements, which are with North Atlantic Treaty Organization (NATO) member countries as well as Japan and the European Union,⁴ realize a G7 leaders' pledge (subsequently endorsed by twenty-five other states) made on the margins of the July 2023 NATO summit in Vilnius.⁵ The pacts comprise political commitments to provide Ukraine with security assistance and economic aid in its fight against Russia. They are part of a series of steps that more closely align and integrate Ukraine into Euro-Atlantic institutions, including the European Union and NATO, without yet offering it membership in those organizations. "Our goal is to strengthen Ukraine's credible defense and deterrence capabilities for the long term," President Joseph R. Biden, Jr. said shortly after he and Ukrainian President Volodymyr Zelensky signed the U.S.-Ukraine accord during the 2024 G7 summit.⁶ Zelensky remarked that it was "very important for all Ukrainians and for all Europeans to know that there will be no security deficit in Europe, which tempts the aggressor to war and makes the future uncertain."⁷ The U.S.-Ukraine agreement's success in the

<https://www.government.nl/binaries/government/documenten/publications/2024/03/01/security-cooperation-between-the-netherlands-and-ukraine/Agreement+on+Security+Cooperation+between+the+Netherlands+and+Ukraine.pdf> [<https://perma.cc/2S3G-HE2S>]; Agreement on Security Cooperation and Long-Term Support Between Ukraine and the Kingdom of Norway (May 31, 2024), at <https://www.president.gov.ua/en/news/ugoda-pro-spivrobitnictvo-u-sferi-bezpeki-ta-dovgostrokovu-p-91241> [<https://perma.cc/3V8K-3FQR>]; Agreement on Security Cooperation Between Ukraine and the Republic of Poland (July 8, 2024), at <https://www.president.gov.ua/en/news/ugoda-pro-spivrobitnictvo-u-sferi-bezpeki-mizh-ukrayinoyu-ta-92009> [<https://perma.cc/E9JE-PC7J>]; Agreement on Security Cooperation Between Ukraine and Portugal (May 28, 2024), at <https://www.president.gov.ua/en/news/ugoda-pro-spivrobitnictvo-u-sferi-bezpeki-mizh-ukrayinoyu-ta-91181> [<https://perma.cc/5MME-CF6W>]; Agreement on Security Cooperation Between Ukraine and Romania (July 11, 2024), at <https://www.president.gov.ua/en/news/ugoda-pro-spivrobitnictvo-u-sferi-bezpeki-mizh-ukrayinoyu-ta-92117> [<https://perma.cc/9MSP-Y45P>]; Agreement on Security Cooperation and Long-Term Support Between Ukraine and the Republic of Slovenia (July 18, 2024), at <https://www.president.gov.ua/en/news/ugoda-pro-spivrobitnictvo-u-sferi-bezpeki-ta-dovgostrokovu-p-92241> [<https://perma.cc/Z9U4-A2FT>]; Agreement on Security Cooperation Between Spain and Ukraine (May 27, 2024), at <https://www.president.gov.ua/en/news/ugoda-pro-spivrobitnictvo-u-sferi-bezpeki-mizh-ukrayinoyu-ta-91145> [<https://perma.cc/NBM2-V8CY>]; Agreement on Security Cooperation Between Ukraine and Sweden (May 31, 2024), at <https://www.president.gov.ua/en/news/ugoda-pro-spivrobitnictvo-u-sferi-bezpeki-mizh-ukrayinoyu-ta-91229> [<https://perma.cc/6PWL-GD48>]; Agreement on Security Co-operation Between the United Kingdom of Great Britain & Northern Ireland and Ukraine (Jan. 12, 2024), at https://assets.publishing.service.gov.uk/media/65a14a6ae96df50014f845d2/UK-Ukraine_Agreement_on_Security_Co-operation.pdf [<https://perma.cc/THN3-WTXL>].

³ See, e.g., President of Ukraine Press Release, Ukraine and Greece Finalize the Text of the Bilateral Security Agreement (July 29, 2024), at <https://www.president.gov.ua/en/news/ukrayina-ta-greciya-finalizuyut-tekst-dvostoronnoyi-bezpekov-92413> [<https://perma.cc/Q7N6-4FBW>]; Khrystyna Bondariva & Kateryna Tyshchenko *Another Security Agreement: Ukraine's Foreign Minister Holds Talks in Balkans*, UKRAINSKA PRAVDA (June 29, 2024), at <https://www.pravda.com.ua/eng/news/2024/06/29/7463246>.

⁴ See Joint Security Commitments Between Ukraine and the European Union (June 27, 2024), at <https://www.president.gov.ua/en/news/spilni-bezpekovi-zobov'yazannya-mizh-ukrayinoyu-ta-yevropejsk-91801> [<https://perma.cc/CJ2X-C8GY>].

⁵ See G7, Joint Declaration of Support for Ukraine (July 12, 2023), at <https://www.state.gov/joint-declaration-of-support-for-ukraine> [<https://perma.cc/JK5V-S39R>] [hereinafter G7 Declaration].

⁶ White House Press Release, Remarks by President Biden and President Volodymyr Zelenskyy of Ukraine in Joint Press Conference | Fasano, Italy (June 13, 2024), at <https://www.whitehouse.gov/briefing-room/speeches-remarks/2024/06/13/remarks-by-president-biden-and-president-volodymyr-zelenskyy-of-ukraine-in-joint-press-conference-fasano-italy> [<https://perma.cc/B79C-UFLU>] [hereinafter Biden and Zelensky Remarks]; see also U.S. Dep't of State Press Release, U.S.-Ukraine Bilateral Security Agreement (June 13, 2024), at <https://www.state.gov/u-s-ukraine-bilateral-security-agreement> [<https://perma.cc/YGT9-FMTY>] (statement of Secretary of State Antony J. Blinken).

⁷ Biden and Zelensky Remarks, *supra* note 6.

coming years will depend on the continued commitment of the Executive Branch and sustained financial support from Congress.

At the Vilnius summit, NATO leaders agreed that “Ukraine’s future is in NATO,”⁸ and they took steps to accelerate Ukraine’s pathway for joining the organization and provide for its security in the meantime. NATO exempted Ukraine from having to complete the usual Membership Action Plan process, replaced the NATO-Ukraine Commission with a Council (an upgrade meant to “demonstrate[] the strengthening of political ties and Ukraine’s increasing integration with NATO”),⁹ and agreed to develop the Comprehensive Assistance Package (in place since 2016 and bolstered in 2022) into a multi-year military assistance program that would “help rebuild the Ukrainian security and defence sector and transition Ukraine towards full interoperability with NATO.”¹⁰ Still, a specific timetable for Ukraine’s accession (a promise that was first made in 2008) was not set.¹¹ The summit communiqué only indicated that the alliance would be “in a position to extend an invitation to Ukraine to join [the organization] . . . when [the] Allies agree and conditions are met.”¹² Taking a more cautious position on Ukraine’s membership than many NATO allies,¹³ President Biden reportedly believes that Ukraine is not yet ready for membership, citing concerns about governance, including corruption.¹⁴ He also apparently fears that accession during the current conflict would, under the North Atlantic Treaty’s mutual defense guarantee, commit the United States to war with Russia.¹⁵

With NATO membership not in the offing, G7 leaders vowed “to formalize—through bilateral security commitments . . . —[their] enduring support to Ukraine as it defends its sovereignty and territorial integrity, rebuilds its economy, protects its citizens, and pursues integration into the Euro-Atlantic community.”¹⁶ The G7 declaration outlined the contents of the contemplated agreements, including commitments to: “[e]nsuring a sustainable force capable of defending Ukraine now and deterring Russian aggression in the future”; “[s]trengthening Ukraine’s economic stability and resilience,” “[p]roviding technical and financial support for Ukraine’s immediate needs stemming from Russia’s war”; “[i]n the event of future Russian armed attack, . . . immediately consult[ing] with Ukraine to determine appropriate next steps”; and “provid[ing] Ukraine with swift and sustained security

⁸ North Atlantic Treaty Organization, Vilnius Summit Communiqué, para. 11 (July 11, 2023), at https://www.nato.int/cps/en/natohq/official_texts_217320.htm [<https://perma.cc/S95J-XU7J>] [hereinafter Vilnius Communiqué].

⁹ North Atlantic Treaty Organization, NATO-Ukraine Council (May 13, 2024), at https://www.nato.int/cps/en/natohq/topics_217652.htm [<https://perma.cc/26VY-6YEA>].

¹⁰ Vilnius Communiqué, *supra* note 8, para. 13.

¹¹ See North Atlantic Treaty Organization, Bucharest Summit Declaration, para. 23 (Apr. 3, 2008), at https://www.nato.int/cps/en/natolive/official_texts_8443.htm [<https://perma.cc/KGU5-GSU2>].

¹² Vilnius Communiqué, *supra* note 8, para. 11.

¹³ See Steven Erlanger, *Divisions Emerge in NATO Over Giving Ukraine a Pathway to Membership, Officials Say*, N.Y. TIMES (Apr. 6, 2023), at <https://www.nytimes.com/2023/04/06/world/europe/ukraine-nato-membership.html>; David E. Sanger & Steven Erlanger, *Allies Pressure Biden to Hasten NATO Membership for Ukraine*, N.Y. TIMES (June 14, 2023), at <https://www.nytimes.com/2023/06/14/us/politics/biden-nato-ukraine.html>.

¹⁴ See Missy Ryan, Michael Birnbaum, Emily Rauhala & Ellen Nakashima, *NATO Vows Lasting Support for Ukraine but Won’t Promise Membership*, WASH. POST (July 9, 2024), at <https://www.washingtonpost.com/national-security/2024/07/09/nato-biden-ukraine-membership>.

¹⁵ See Mariana Alfaro, *Biden, U.S. Leaders Insist War with Russia Must End Before Ukraine Joins NATO*, WASH. POST (July 9, 2023), at <https://www.washingtonpost.com/politics/2023/07/09/biden-nato-ukraine-russia>.

¹⁶ G7 Declaration, *supra* note 5.

assistance, modern military equipment across land, sea and air domains, and economic assistance.”¹⁷ Similar bilateral security agreements had been entered into in 2022 between Finland and Sweden and many NATO countries, including the United States, pending their accession to NATO, though those agreements were made after Finland and Sweden were offered and had accepted membership and no membership offer has yet been made to Ukraine.¹⁸ A Kremlin spokesperson called the G7 declaration “a mistake . . . [that] can be very dangerous,” and he warned G7 members that, “by providing security guarantees to Ukraine, they are encroaching on Russia’s security.”¹⁹

The U.S.-Ukraine agreement, which is modeled in part on the Comprehensive Security Integration and Prosperity Agreement entered into between the United States and Bahrain,²⁰ focuses predominantly on defense and security cooperation, though it also includes provisions on economic recovery and cooperation to promote Ukrainian institutional reforms.²¹ An executive agreement under U.S. law, the text does not establish specific performance obligations, except the one described below concerning consultations in the event of future Russian aggression. Instead, the agreement embodies political commitments (explicitly, on occasion, referring to the “policy of the United States”).²² Nonetheless, the White House described the text as “sending a powerful signal of our strong support for Ukraine now and into the future” and, together with the other bilateral security agreements, “a key part of Ukraine’s bridge to NATO membership.”²³

The agreement’s security provisions “are intended to support Ukraine’s efforts to win today’s war and deter future Russian military aggression.”²⁴ Avoiding any specific commitments pertaining to the current armed conflict between Ukraine and Russia, the agreement

¹⁷ *Id.*

¹⁸ See *U.S. Offers Assurances to Sweden, Finland Over NATO Application*, REUTERS (May 5, 2022), at <https://www.reuters.com/world/europe/us-offers-assurances-sweden-finland-over-nato-application-2022-05-05>; *Sweden Says It Received U.S. Security Assurances if It Hands in NATO Application*, REUTERS (May 4, 2022), at <https://www.reuters.com/world/europe/sweden-says-it-received-us-security-assurances-if-it-hands-nato-application-2022-05-04>; North Atlantic Treaty Organization Press Release, Statement by Secretary General Jens Stoltenberg on Finland and Sweden’s NATO Membership (May 17, 2023), at https://www.nato.int/cps/en/natohq/opinions_212882.htm.

¹⁹ *G7’s Guarantees for Ukraine to Encroach on Russia’s Security — Kremlin Spokesman*, TASS (July 12, 2023), at <https://tass.com/world/1645859>.

²⁰ See Jacob Katz Cogan, *Contemporary Practice of the United States*, 108 AJIL 168, 190 (2024). Reportedly, the U.S.-Ukraine Agreement was also modeled on a 2016 security assistance memorandum of understanding between the United States and Israel. See David E. Sanger, *Will Biden’s Help for Ukraine Come Fast Enough and Last Long Enough?*, N.Y. TIMES (June 13, 2024), at <https://www.nytimes.com/2024/06/13/world/europe/g7-biden-ukraine-agreements.html>. Unlike the Ukraine agreement, though, the Israel agreement pledged specific amounts of military assistance. See White House Press Release, *Fact Sheet: Memorandum of Understanding Reached with Israel* (Sept. 14, 2016), at <https://obamawhitehouse.archives.gov/the-press-office/2016/09/14/fact-sheet-memorandum-understanding-reached-israel> [<https://perma.cc/VU7Z-WHY5>].

²¹ The agreement extends existing security partnerships between the United States and Ukraine. See, e.g., *Fact Sheet - U.S.-Ukraine Strategic Defense Framework* (Aug. 31, 2021), at <https://media.defense.gov/2021/Aug/31/2002844632/-1/-1/0/US-UKRAINE-STRATEGIC-DEFENSE-FRAMEWORK.PDF> [<https://perma.cc/K94G-S4PA>]; *U.S.-Ukraine Charter on Strategic Partnership* (Nov. 10, 2021), at <https://www.state.gov/u-s-ukraine-charter-on-strategic-partnership> [<https://perma.cc/K5QE-TMXP>].

²² U.S.-Ukraine Bilateral Security Agreement, *supra* note 1, Art. XI.

²³ White House Press Release, *Fact Sheet: U.S.-Ukraine Bilateral Security Agreement* (June 13, 2024), at <https://www.whitehouse.gov/briefing-room/statements-releases/2024/06/13/fact-sheet-u-s-ukraine-bilateral-security-agreement> [<https://perma.cc/4XGR-DRER>].

²⁴ U.S.-Ukraine Bilateral Security Agreement, *supra* note 1, Art. II.

provides that “[a]ny future aggression or threat of aggression against the sovereignty, independence, and territorial integrity of either” Ukraine or the United States would be considered “a matter of grave concern [by] the other Party.”²⁵ If, under such circumstances, there were an “armed attack or threat of armed attack against Ukraine,” the parties commit to “immediately meet, where possible within 24 hours, at the most senior levels to determine appropriate next steps and additional defense needs.”²⁶ The agreement identifies ten forms of cooperation, including “[p]rovision of defense articles and services,” “[c]ombined military maneuvers and exercises,” and “[i]ncreased defense industrial cooperation.”²⁷ An annex to the agreement elaborates upon implementation of defense and security cooperation, particularly in the three areas just noted.²⁸ The agreement does not, however, “give rise to rights or obligations under domestic or international law,” and its implementation is explicitly made “subject to the availability of appropriated funds.”²⁹

Beyond security, the agreement promotes economic recovery and reform, including through calls for cooperation in identifying strategic investment opportunities and strengthening Ukraine’s civilian nuclear energy sector.³⁰ Other provisions identify areas in which the United States and Ukraine will cooperate to reform Ukrainian institutions in line with requirements for accession to the European Union and NATO membership.³¹

The conclusion of the U.S.-Ukraine agreement followed the passage in April 2024 of the delayed Ukraine Security Supplemental Appropriations Act, a \$61 billion aid package.³² The agreement’s announcement took place concurrently with the G7’s decision, at its 2024 summit in Italy, to issue a \$50 billion loan to Ukraine that would be repaid from the interest and profits on the hundreds of billions of dollars of Russian frozen assets held by the West.³³ Previously, the European Union had agreed only to use the assets’ interest to support Ukraine, not as security for a loan.³⁴ The unveiling of the agreement was also coordinated with the expansion of U.S. sanctions against those supporting Russia’s war effort, including against foreign financial institutions that conduct transactions with designated Russian banks and other sanctioned entities.³⁵

A year after the NATO meeting in Vilnius where the G7 had called for the bilateral security agreements, leaders gathered in Washington, DC to mark the alliance’s seventy-fifth

²⁵ *Id.*

²⁶ *Id.*

²⁷ *Id.*

²⁸ *See id.*, Annex.

²⁹ *Id.*, Annex, Final Provisions, Legal Status and Funding of Annex.

³⁰ *Id.* Art. III.

³¹ *See id.* Art. IV.

³² *See* Ukraine Security Supplemental Appropriations Act, 2024, Pub. L. 118-50, Div. B (Apr. 24, 2024).

³³ *See* Ken Thomas & Laurence Norman, *At G-7, Biden and European Leaders Agree to Finance Ukraine Using Russian Assets*, WALL ST. J. (June 13, 2024), at <https://www.wsj.com/world/russia/at-g-7-biden-and-european-leaders-agree-to-finance-ukraine-using-russian-assets-42c6f540>.

³⁴ *See* Jacob Katz Cogan, *Contemporary Practice of the United States*, 108 AJIL 338, 339 (2024); Steven Erlanger & David E. Sanger, *G7 Leaders Agree on \$50 Billion Loan to Ukraine from Frozen Russian Assets*, N.Y. TIMES (June 13, 2024), at <https://www.nytimes.com/2024/06/13/world/europe/g7-ukraine-loan-russian-assets.html>.

³⁵ *See* U.S. Dep’t of the Treasury Press Release, *As Russia Completes Transition to a Full War Economy, Treasury Takes Sweeping Aim at Foundational Financial Infrastructure and Access to Third Country Support* (June 12, 2024), at <https://home.treasury.gov/news/press-releases/jy2404> [<https://perma.cc/DMA6-GTNV>].

anniversary. There, they affirmed that “Ukraine’s future is in NATO” and that the country was on an “irreversible path to full Euro-Atlantic integration, including NATO membership.”³⁶ They announced the creation of a new command, the NATO Security Assistance and Training for Ukraine (NSATU), which will take over some of the responsibilities of the Ukraine Defense Contact Group, a coalition of NATO and other states, led by the United States, that has been coordinating military aid since the beginning of the war.³⁷ The NATO leaders’ Washington Declaration was quick to explain that NSATU “will operate in Allied states [to] . . . support Ukraine’s self-defence in line with the UN Charter” and “will not, under international law, make NATO a party to the conflict.”³⁸ NATO members also announced a Pledge of Long-Term Security Assistance for Ukraine, “affirm[ing] [their] determination to support Ukraine in building a force capable of defeating Russian aggression today and deterring it in the future.”³⁹

The day after NATO’s Washington summit, President Biden launched a new initiative—the Ukraine Compact—marking the year since the G7 called for the negotiation of bilateral security agreements. Signed by Ukraine, the European Union, and the twenty-four countries that have concluded agreements with Ukraine to date, the compact, according to the White House, “fulfills the promise . . . made in Vilnius in 2023 . . . to support Ukraine as it defends itself now, and to deter aggression against Ukraine in the future as part of its bridge to NATO membership.”⁴⁰ President Biden remarked at the compact’s announcement that it establishes a “unified, coordinated, and comprehensive architecture to support Ukraine not just for now but for years in the future.”⁴¹ The document contains no new commitments, including with regard to accession to NATO, but the signatories collectively avowed that “the security of Ukraine is integral to the security of the Euro-Atlantic region and beyond, and that [they] intend to support Ukraine until it prevails against Russia’s aggression.”⁴²

³⁶ North Atlantic Treaty Organization, Washington Summit Declaration, para. 16 (July 10, 2024), at https://www.nato.int/cps/en/natohq/official_texts_227678.htm [<https://perma.cc/XM6T-7NC4>].

³⁷ See *id.*, para. 15.

³⁸ *Id.*

³⁹ *Id.*

⁴⁰ White House Press Release, President Joe Biden Launches the Ukraine Compact (July 11, 2024), at <https://www.whitehouse.gov/briefing-room/presidential-actions/2024/07/11/president-joe-biden-launches-the-ukraine-compact> [<https://perma.cc/NYV2-73SU>].

⁴¹ White House Press Release, Remarks by President Biden on the Ukraine Compact (July 11, 2024), at <https://www.whitehouse.gov/briefing-room/speeches-remarks/2024/07/11/remarks-by-president-biden-on-the-ukraine-compact> [<https://perma.cc/8P5E-JYGN>].

⁴² President Joe Biden Launches the Ukraine Compact, *supra* note 40.