



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C.

OFFICE OF FOREIGN ASSETS CONTROL

**Executive Order 14203 of February 6, 2025
Imposing Sanctions on the International Criminal Court**

GENERAL LICENSE NO. 2

Authorizing the Provision of Certain Legal Services

(a) The provision of the following legal services to or on behalf of persons whose property and interests in property are blocked pursuant to Executive Order (E.O.) 14203 is authorized, provided that any receipt of payment of professional fees and reimbursement of incurred expenses must be authorized pursuant to General License 3 under E.O. 14203, which authorizes certain payments for legal services from funds originating outside the United States; via specific license; or otherwise pursuant to E.O. 14203:

(1) Provision of legal advice and counseling on the requirements of and compliance with the laws of the United States or any jurisdiction within the United States, provided that such advice and counseling are not provided to facilitate transactions in violation of E.O. 14023;

(2) Representation of persons named as defendants in or otherwise made parties to legal, arbitration, or administrative proceedings before any U.S. federal, state, or local court or agency;

(3) Initiation and conduct of legal, arbitration, or administrative proceedings before any U.S. federal, state, or local court or agency;

(4) Representation of persons before any U.S. federal, state, or local court or agency with respect to the imposition, administration, or enforcement of U.S. sanctions against such persons; and

(5) Provision of legal services in any other context in which prevailing U.S. law requires access to legal counsel at public expense.

(b) The provision of any other legal services to or on behalf of persons whose property and interests in property are blocked pursuant to E.O. 14203, not otherwise authorized pursuant to a general license issued pursuant to E.O. 14203, requires the issuance of a specific license.

(c) U.S. persons do not need to obtain specific authorization to provide related services, such as making filings and providing other administrative services, that are ordinarily incident to the provision of services authorized by paragraph (a) of this general license. Additionally, U.S. persons who provide services authorized by paragraph (a) of this general license do not need to obtain specific authorization to contract for related services that are ordinarily incident to the provision of those legal services, such as those provided by private investigators or expert witnesses, or to pay for such services.

(d) Entry into a settlement agreement or the enforcement of any lien, judgment, arbitral award, decree, or other order through execution, garnishment, or other judicial process purporting to transfer or otherwise alter or affect property or interests in property blocked pursuant to E.O. 14203 is prohibited unless licensed pursuant to E.O. 14203.

Lisa M. Palluconi
Acting Director
Office of Foreign Assets Control

Dated: June 5, 2025