

WHAT TO INCLUDE IN YOUR DELISTING PETITION

REQUIRED INFORMATION

For Listed Individuals

- Exact name that appears on OFAC list*
- Unique identification (UID) number found in OFAC's Sanctions List Search tool*
- Date on which OFAC listed the relevant name**
- Full name (as it appears on official government ID)
- Proof of identity (e.g., copy of an official government ID)
- All aliases
- Date and place of birth
- Physical and mailing addresses
- Email addresses
- Telephone numbers
- Relevant arguments explaining why the listed person or property should be removed from the list
- Documentation supporting information and arguments

For Listed Entities or Property

- Exact name that appears on OFAC list*
- Unique identification (UID) number found in OFAC's Sanctions List Search tool*
- Date on which OFAC listed the relevant name**
- Full official name (as it appears in government registration documents)
- Official registration documentation (e.g., business license or aircraft/vessel registration number)
- All aliases
- Registration date
- Physical and mailing addresses
- Email addresses
- Telephone numbers
- Relevant arguments explaining why the listed person or property should be removed from the list
- Documentation supporting information and arguments

For Representatives of Listed Persons or Property

- Exact name that appears on OFAC list*
- Unique identification (UID) number found in OFAC's Sanctions List Search tool*
- Date on which OFAC listed the relevant name**
- Authorized representative's name and email address
- Proof of authorization to represent listed person or property from the listed person (e.g., power of attorney)
- A description of the representative's relationship to the listed person or property
- Relevant arguments explaining why the listed person or property should be removed from the list
- Documentation supporting information and arguments

*Use [OFAC's Sanctions List Search](#) tool to ensure you include the correct name (as listed on the relevant OFAC-administered sanctions list) as well as the unique identification (UID) number. Locate the relevant entry for the sanctioned person or property. The UID number will be the numeric string at the end of the web address following the text "https://sanctions-search.ofac.treas.gov/Details.aspx?id=#####" (e.g., "id=12345"). See [FAQ 1031](#) for additional information on OFAC's sanctions list search tool UIDs.

**See [FAQ 466](#) for information on how to find the date a sanctions target listing was added, updated, or removed from an OFAC list.

RECOMMENDED ADDITIONAL INFORMATION

- Sources of income
- Real property ownership
- Current/past employment and professional activity
- Social media handles

- Bank account information including virtual currency
- Contact and relationships with other persons and property listed on an OFAC list

- Ownership structures
- Websites
- A list of all past and current owners, operators, and managers

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RELEVANT ARGUMENTS

Make one of the two claims below

Change in Circumstances

Demonstrate that, **after the sanction was imposed**, the sanctioned person took steps to remove the basis for the sanction, or that the underlying circumstances otherwise changed (e.g., resignation from a relevant position; the liquidation, dissolution, or termination of a listed entity; or the cessation of all sanctionable activity). A sanctioned person may propose remedial steps that would negate the basis for the sanction but such steps are not a substitute for establishing a change in circumstances.

Persons seeking to effect a change in circumstances by transferring assets or divesting from sanctioned entities to conduct due diligence on counterparties should coordinate with OFAC in advance, as these transactions could themselves trigger additional sanctions or expose third-party actors to possible sanctions.

Insufficient Basis

Demonstrate that, at the time of the sanction, facts or circumstances existed showing that there was no basis for the sanction. This may include sanctions based on mistaken identity. It may also include sanctions on individuals who had resigned from relevant roles, or sanctions on entities that had dissolved, **before the sanction was imposed**.

This claim requires evidence in existence prior to the imposition of sanctions.

While OFAC generally expects petitions to be submitted under only one of the two justifications listed above, the Reconsideration Portal allows you to submit arguments for both justifications. Where appropriate, clearly state in any submitted arguments and evidence which justification applies.

Petitioning persons or property sanctioned under multiple authorities need to meet the criteria for removal from OFAC sanctions lists with respect to all authorities under which the person or property is sanctioned. For example, if an entity was designated pursuant to two executive orders, a delisting petition would need to address relevant designation criteria for both executive orders. The same applies if the entity was sanctioned under multiple designation criteria within a single sanctions authority—the delisting petition would need to address both designation criteria to request removal.