

Guidance on Requests for De-listing and Unfreezing

Requests for De-listing – Individuals or Entities Designated by the UN

I. Who may submit a de-listing request?

Individuals or entities listed by the United Nations (“UN”) may request de-listing if they do not, or no longer, meet the criteria for designation.

II. Where should a de-listing request be submitted?

Requests by individuals or entities listed on the ISIL (Da’esh) & Al-Qaida Sanctions Lists under UN Security Council Resolutions (“UNSCRs”) 1267/1989/2253 or 1988 should be submitted directly to the UN [Office of the Ombudsperson](#):

United Nations
Department of Political and Peacebuilding Affairs
Office of the Ombudsperson to the ISIL (Da’esh) and Al-Qaida Sanctions Committee
New York, NY 10017
United States of America
Tel: +1 212 963 2671
Email: ombudsperson@un.org

Requests individuals or entities listed under other UNSCRs should be submitted directly to the UN’s [Focal Point for De-listing](#):

Focal Point for De-listing
Security Council Subsidiary Organs Branch
Room DC2 2034
United Nations
New York, NY 10017
United States of America
Tel. +1 917 367 9448
Fax. +1 917 367 0460
Email: delisting@un.org

Alternatively, nationals and residents of the Marshall Islands may submit a de-listing request to the Marshall Islands Minister of Justice, Immigration and Labor. The Minister processes these requests in accordance with Section 6 of the United Nations Targeted Financial Sanctions (Terrorism & Proliferation) Regulations, 2020.

III. What should be included in a de-listing request?

Delisting requests should contain the following information:

1. explanation as to why the designation does not or no longer meets the listing criteria (through countering the reasons for listing as stated in the list entry for that particular individual or entity);

2. the designee's current occupation and/or activities, and any other relevant information, such as information on assets; and
3. any documentation supporting the request can be referred to and/or attached together with the explanation of its relevance, where appropriate.

For a deceased individual, the following information should be included:

1. death certificate or similar official documentation confirming the death whenever possible; and
2. whether or not any legal beneficiary of the deceased's estate or any joint owner of his /her assets is on the Sanctions Lists.

IV. Decision of the UN Security Council Committee

Upon successful de-listing by the relevant UN Security Council Committee, the prohibition and freezing mechanisms under Marshall Islands law and the relevant UN Resolutions will no longer apply to the individual or entity.

Requests to Unfreeze Funds or Other Assets

In exceptional cases, individuals and entities not listed by the UN as designated individuals or entities may be inadvertently affected by the prohibition or freezing mechanism under the United Nations Sanctions (Implementation) Act, 2020 and the associated United Nations Targeted Financial Sanctions (Terrorism & Proliferation) Regulations, 2020. For example, an individual or entity could have a name similar to that of a designated individual or entity.

Affected persons may apply to the Marshall Islands Minister of Justice, Immigration and Labor for release of the asset in question. The request should include information and supporting documents demonstrating that the affected person is not a designated individual or entity.

Upon verification, the relevant authorities will work with the affected person to clarify and resolve the prohibition or freezing issue.