

LINKS AND RESOURCES ON US SANCTIONS ON ICC

Office of Foreign Assets Control (OFAC) Info Page on Executive Order 14203

<https://ofac.treasury.gov/sanctions-programs-and-country-information/international-criminal-court-related-sanctions>

This is the official US Government webpage on ICC-related sanctions maintained by OFAC, the agency of the US Department of Treasury that maintains and enforces economic and trade sanctions. More about OFAC here:

<https://ofac.treasury.gov/about-ofac#:~:text=The%20Office%20of%20Foreign%20Assets%20Control%20administers,accomplish%20foreign%20policy%20and%20national%20security%20goals.>

This page contains a frequently asked questions (FAQ) page, interpretive guidance, and directions on applying for a specific OFAC license to engage in a transaction that otherwise be prohibited, as well as general licenses, which are issued “In order to authorize activities that would otherwise be prohibited with regard to the International Criminal Court-Related Sanctions. General licenses allow all US persons to engage in the activity described in the general license without needing to apply for a specific license.”

The website contains a partial *inexhaustive* archive of selected revoked and expired general licenses, including under the ICC sanctions program, which include licenses granted during 30-day “wind-down periods” after a designation of an individual or organization as sanctioned for US legal persons to cease certain activities with them. We are aware of at least one general license granted for an organization of prosecutors and others working with OTP and two individual licenses to work with the ICC on specific situations/cases.

Currently sanctioned individuals and entities under ICC-EO14203 Program (as 12/2/25)

| | | | |
|--|------------|-------------|-----|
| AL HAQ - LAW IN THE SERVICE OF MANKIND | Entity | ICC-EO14203 | SDN |
| AL MEZAN CENTER FOR HUMAN RIGHTS | Entity | ICC-EO14203 | SDN |
| ALAPINI GANSOU, Reine Adelaide Sophie | Individual | ICC-EO14203 | SDN |
| ALBANESE, Francesca Paola | Individual | ICC-EO14203 | SDN |
| BOSSA, Solomy Balungi | Individual | ICC-EO14203 | SDN |
| GUILLOU, Nicolas Yann | Individual | ICC-EO14203 | SDN |
| HOHLER, Beti | Individual | ICC-EO14203 | SDN |
| IBANEZ CARRANZA, Luz Del Carmen | Individual | ICC-EO14203 | SDN |
| KHAN, Karim Asad Ahmad | Individual | ICC-EO14203 | SDN |
| KHAN, Nazhat Shameem | Individual | ICC-EO14203 | SDN |
| NIANG, Mame Mandiaye | Individual | ICC-EO14203 | SDN |
| PALESTINIAN CENTRE FOR HUMAN RIGHTS | Entity | ICC-EO14203 | SDN |
| PROST, Kimberly | Individual | ICC-EO14203 | SDN |

Strategic Litigation Efforts

We are aware of three cases challenging the current sanctions regime under First Amendment grounds (following on two cases challenging the 2020 sanctions).

- SMITH v. TRUMP, 1:25-cv-00158, (D. Me.)
 - **Background:** ACLU Presser on *Smith v. Trump* (7/18): <https://www.aclu.org/press-releases/court-agrees-trump-administrations-icc-sanctions-likely-violate-advocates-first-amendment-rights>
 - **Date Filed:** April 11, 2025
 - **Date of Last Known Filing:** Nov. 20, 2025
 - **Cause:** [28:2201 Declaratory Judgment](#)
 - **Status:** Preliminary injunction in place; briefing on government's motion to dismiss for lack of subject matter jurisdiction due December 26, 2025.
- RONA v. TRUMP, 1:25-cv-03115, (District Court, S.D. New York)
 - **Background:** NYTimes coverage: <https://www.nytimes.com/2025/07/30/us/politics/trump-icc-lawyers.html>
 - **Date Filed:** April 15, 2025
 - **Date Terminated:** Aug. 18, 2025
 - **Cause:** [50:1701 International Emergency Economic Powers Act](#)
 - **Status:** Permanent injunction granted on August 18, 2025,
“JUDGMENT: It is ORDERED and ADJUDGED that Defendants United States Department of State, Marco A. Rubio, United States Department of the Treasury, Scott K.H. Bessent, United States Department of Justice, Pamela J. Bondi, United States Office of Foreign Assets Control, and Bradley T. Smith are permanently ENJOINED from enforcing the civil or criminal penalty provisions of the International Emergency Economic Powers Act, 50 U.S.C. §§ 1701 et seq., against Gabor Rona and Lisa Davis on the basis of the following education, training, analysis, and analytical services provided by them to or for the benefit of any person designated under Executive Order 14,203, Imposing Sanctions on the International Criminal Court, 90 Fed. Reg. 9369 (the "Executive Order"), to the extent such conduct is alleged to have been committed in violation of the Executive Order: As further set forth in this Order. The Court ORDERS that the Clerk of Court shall enter judgment in favor of Gabor Rona and Lisa Davis and close this case. (Signed by Judge Jesse M. Furman on 8/18/2025) (ks)”
- IVERSON v. TRUMP, 1:25-cv-1353 (District Court, DC)
 - **Background:** Human Rights First briefer: <https://humanrightsfirst.org/iverson-v-trump-administration/>
 - **Date Filed:** May 5, 2025
 - **Date Terminated:** May 13, 2025
 - **Cause:** [50:1701 International Emergency Economic Powers Act](#)
 - **Status:** Case terminated for mootness when individual (specific license granted).

Selected Civil Society-Led Advocacy Efforts

- Press release on sanctions by Charity and Security Network released, 10/16: <https://charityandsecurity.org/csn-press-releases-advisories/u-s-sanctions-on-palestinian-human-rights-organizations-erodes-international-law-civil-society-warns/>
- Open letter signed by approx. 270 CSOs: “Upholding not Undermining International Law”
 - <https://humanrightsfirst.org/library/upholding-not-undermining-international-law-civil-society-open-letter-to-states-september-2025/>
 - https://ishr.ch/wp-content/uploads/2025/09/NGO-Letter-to-States-Upholding-Treaties_9222025-1.pdf
 - <https://www.icvanetwork.org/blog/upholding-not-undermining-international-law-civil-society-open-letter-to-states/>
 - <https://voiceeu.org/news/upholding-not-undermining-international-law-civil-society-open-letter-to-states>
- Full statement by Al-Haq, PCHR, and Al-Mezan: <https://www.alhaq.org/advocacy/26662.html>
- OHCHR statement: <https://www.ohchr.org/en/press-releases/2025/09/turk-calls-us-withdraw-sanctions-against-palestinian-rights-groups> (see also previous UN High Commissioner statement: <https://news.un.org/en/story/2025/08/1165696>)
- INCLO joint statement: <https://www.hrlc.org.au/news/inclo-statement-al-haq/>
- Amnesty International statement: <https://www.amnesty.org/en/latest/news/2025/09/israel-opt-us-sanctions-against-palestinian-ngos-a-blatant-attack-on-human-rights/>
- Human Rights Watch statement: <https://www.hrw.org/news/2025/09/04/us-uses-icc-sanctions-against-three-leading-palestinian-rights-groups>
- FIDH statement: <https://www.fidh.org/en/region/north-africa-middle-east/israel-palestine/fidh-denounces-heinous-us-sanctions-against-leading-palestinian-human>
- Front Line Defenders statement: <https://www.frontlinedefenders.org/tr/node/5206>
- International Service for Human Rights statement today (link down when agenda drafted): <https://ishr.ch/latest-updates/joint-solidarity-statement-on-palestine-to-uphold-international-law-in-the-face-of-israels-genocide/>
- Washington Working Group for the ICC (WICC) Open Letter: <https://www.washingtonicc.org/2025-open-letter-regarding-sanctions-on-icc>
- WICC-convened Congressional briefing recording: <https://globalsolutions.org/updates/blog/rights-groups-advocates-and-atrocity-survivors-urge-opposition-to-icc-sanctions-bill/>

General Information and Explanation on Sanctions

- State Department Press Statements on Sanctions Designations:
 - [9/4/25: Sanctioning Foreign NGOs Directly Engaged in ICC’s Illegitimate Targeting of Israel](#)
 - [8/20/25: Statement by Secretary Marco Rubio: Imposing Further Sanctions in Response to the ICC’s Ongoing Threat to Americans and Israelis](#)
 - [8/20/25: Fact Sheet: Imposing Further Sanctions in Response to the ICC’s Ongoing Threat to Americans and Israelis](#)
 - [7/8/25: Sanctioning Lawfare that Targets U.S. and Israeli Persons](#)
 - [6/5/25: Statement by Secretary Marco Rubio: Imposing Sanctions in Response to the ICC’s Illegitimate Actions Targeting the United States and Israel](#)
 - [6/5/25: Fact Sheet: Imposing Sanctions in Response to the ICC’s Illegitimate Actions Targeting the United States and Israel](#)
- [Executive Order 14203: Imposing Sanctions on the International Criminal Court](#)
- Human Rights First explainer by Adam Keith: <https://humanrightsfirst.org/library/unpacking-the-u-s-sanctions-on-a-un-special-rapporteur/>
- Other selected coverage:
 - <https://www.pbs.org/video/sanctioning-the-icc-1763234008>
 - <https://www.cnn.com/2025/09/04/middleeast/trump-rubio-israel-palestinian-sanctions-hnk-intl>
 - <https://www.aljazeera.com/news/2025/9/4/us-sanctions-palestinian-rights-groups-for-supporting-icc-israel-probe>

Please note that this is a compilation of publicly available resources and contains no analysis or interpretation by the compiler(s). This document does not constitute legal advice.