

JULY 8, 2026

CLIENT ALERT

OFAC Launches Reconsideration Portal and Publishes New Guidance to Streamline Delisting Petitions

On June 29, 2026, the Office of Foreign Assets Control (“OFAC”) [launched](#) its new [Reconsideration Portal](#) to streamline petitions for delisting (which are also referred to as “requests for removal” or “requests for reconsideration”) from the Specially Designated Nationals (“SDN”) List,¹ marking a transition away from email submissions.

Concurrently with the launch, OFAC published two quick-references guides: [What to Include](#) in the Delisting Petitions (“**What to Include Guide**”) and [Best Practices](#) for Delisting Petitions (“**Best Practices Guide**”).

Authorities and Filing

To accompany the launch of the Reconsideration Portal, OFAC updated [FAQ 897](#) to clarify how petitioners can apply for delisting and provide insight into OFAC’s review process and timeline for issuing a decision.

By way of a reminder, depending on the underlying authority used to designate a person for sanctions, different U.S. government agencies lead the administration and adjudication of delisting requests. In most cases, the decisions are made by the U.S. Department of the Treasury (“**Treasury Department**”), in consultation with the U.S. Department of State (“**State Department**”), and the reconsideration petitions should be filed with OFAC. However, if the designation was made by the State Department, it will act as an administering and adjudicatory authority, while still consulting with the Treasury Department.

Regardless of the administering authority, a request for reconsideration must be filed with OFAC, rather than with the State Department directly. As at the time of preparing this client alert, State has yet to update its guidance on the reconsideration petitions and still directs petitioners to filing their applications to OFAC by email rather than through OFAC’s Reconsideration Portal.²

Whilst the similar procedures apply to the delisting from other lists of sanctioned persons or property ¹ maintained by OFAC (e.g., a Sectoral Sanctions Identification List), this client alert focuses on OFAC’s SDN List. [/https://www.state.gov/sanctions-delisting](https://www.state.gov/sanctions-delisting) ²

Re-filing after the Petition was Denied

OFAC also published [FAQ 1261](#), which assures applicants whose delisting petition had been denied that they are permitted to re-apply, so long as new arguments or evidence are provided to support the new application.

Mistaken Identity – reach out to OFAC’s Compliance Hotline

FAQ 1261 also makes clear that those who have been mistaken for a sanctioned person (e.g. their name is a close match to a listed person) should not reach out to OFAC via the Reconsideration Portal, but should instead contact OFAC’s Compliance Hotline.

The cases of mistaken identity are different from the situations where the designation contains the incorrect details of the listed person (for example, the tax ID of another legal entity). In such a case, the affected person can file a request for reconsideration to correct the error on the SDN List.

Request for a Courtesy Document via the Reconsideration Portal

The Reconsideration Portal also permits persons who have been designated on the SDN List to request unclassified, non-privileged information that served as the bases for the designation— a compilation of this information is referred to as a “courtesy document”.

While petitioners may still submit a Freedom of Information Act (“**FOIA**”) request to the Treasury Department for the wider evidentiary record (as courtesy documents typically contain the list of exhibits that formed the basis of the designation), OFAC has created an alternative avenue to request courtesy documents to streamline the delisting process.

What to Include Guide

OFAC's What to Include Guide identifies required and recommended elements of a delisting petition to assist petitioners in drafting a comprehensive application that is ready for review. Required information includes the exact name that appears on the OFAC SDN List, personal identifying information, and importantly, relevant arguments explaining the grounds for removal and documentation supporting these arguments. Arguments that OFAC will consider are changes in circumstances after the sanctions were imposed that would negate the basis for the designation, or that there is an insufficient basis for the designation. Additional information that OFAC recommends petitioners include are sources of income, real property ownership, past and current employment, social media handles, bank account information, relationship with other persons and property on the SDN List, among others.

Best Practices Guide

OFAC's Best Practices Guide offers the following key guidance for petitioners:

- *Be clear, factual and concise:* petitions should present arguments and evidence in a straightforward manner, focusing on why the designation was based on an insufficient basis, or how a change in circumstance now negates the basis for the designation.
- *Follow instructions and provide consistent and accurate information upfront:* moving forward, submissions should be made through the portal, and not via email. In addition, incomplete submissions and inaccurate or misleading information will likely cause delay and/or denial; thus, it is imperative that applications contain accurate and relevant information and documentation. Providing false or misleading information could result in a separate enforcement action or otherwise result in consequences for the petitioner and/or its attorneys/representatives.
- *Respond promptly to OFAC inquiries:* OFAC encourages petitioners to contact the agency if they do not receive a Petition ID within 10 business days of submitting the application. Furthermore, OFAC typically endeavors to send its first questionnaire, if one is necessary, within 90 days of receiving the petition. Timely and thorough responses to questionnaires are critical in avoiding delays.
- *Organize supporting documentation:* the evidence should be in the English language or accompanied by an English translation, and it should be organized and indexed clearly.

Impact and Next Steps

Currently, the Treasury Department and the State Department face a significant backlog of reconsideration and FOIA petitions. As a result, some petitioners have resorted to filing suit against the U.S. Government to compel progress on their petitions.

The launch of the Reconsideration Portal and OFAC's publication of the FAQs, a [Quick Reference Guide](#), and [Best Practices](#) indicate a real effort by OFAC to streamline the delisting process and set out its expectations in order to optimize the process for both the petitioners and OFAC. Should the portal have its intended effect, clients can expect a more efficient delisting process.

Curtis' International Sanctions Practice Group and its attorneys have extensive experience in the U.S., EU and UK sanctions matters, including successful delisting from OFAC's SDN List. Please contact us at the below details should you have any questions on the above or would like to discuss your matter.

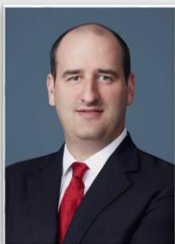
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Please feel free to contact any of the persons listed below if you have any questions on this important development:



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