



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

LICENSE No. ICC-EO14203-1370890-1

LICENSE

Issued under the authority of one or more of 50 U.S.C. §§ 1601-51, 1701-06, Pub. L. 113-278, and Executive Order 14203.

**To: Association of International Criminal Law Prosecutors
c/o Jason Wright
Steptoe LLP
1114 Avenue of the Americas
New York, NY 10036**

1. Based upon your request dated April 7, 2025, on behalf of the Association of International Criminal Law Prosecutors, to the Office of Foreign Assets Control (the "Application"), the transactions described herein are hereby authorized.
2. This License is subject to the condition, among others, that the Licensee(s) comply with its terms and with all regulations, rulings, orders, and instructions issued under any of the authorities cited above.
3. This License expires on **June 30, 2027**, and is not transferable. The transactions described in this License are subject to the authorities cited above and any regulations and rulings issued pursuant thereto. This License may be revoked or modified at any time. If this License was issued as a result of willful misrepresentation, it may be declared void from the date of its issuance or from any other date.
4. This License does not authorize transactions prohibited by any law or regulation administered by the Office of Foreign Assets Control other than those listed above.
5. This License does not excuse the Licensee(s) from the need to comply with any law or regulation (including reporting requirements) administered by any other agency or the need to obtain any required authorization(s) from any other agency.

Issued on behalf of the Secretary of the Treasury:

OFFICE OF FOREIGN ASSETS CONTROL

By _____
Lorena Valente
Assistant Director for Licensing

SECTION I – AUTHORIZATION: Subject to the conditions and limitations stated herein, and to the extent authorization is required, the members of the Association of International Criminal Law Prosecutors (“AICLP” or the “Licensees”) are hereby authorized to engage in all transactions that would otherwise be prohibited pursuant to Executive Order (E.O.) 14203 that are ordinarily incident and necessary to the following activities in the Licensees’ conduct with the International Criminal Court (“ICC”):

- (a) Investigation, arrest, detention, and prosecution of individuals accused of international crimes before the ICC, except any investigation, arrest, detention or prosecution of any “protected person” as defined pursuant to E.O. 14203;
- (b) Preparing legal analysis and pleadings, providing training, advice, and presentations, except in the context of any investigation, arrest, detention or prosecution of any “protected person” as defined pursuant to E.O. 14203; and
- (c) Conducting and supervising research, making legal arguments, or examining witnesses, except in the context of any investigation, arrest, detention or prosecution of any “protected person” as defined pursuant to E.O. 14203.

Pursuant to this authorization, the term “protected person” as defined pursuant to E.O. 14203 means:

- (i) any United States person, unless the United States provides formal consent to ICC jurisdiction over that person or becomes a state party to the Rome Statute, including:
 - a. current or former members of the Armed Forces of the United States;
 - b. current or former elected or appointed officials of the United States Government; and
 - c. any other person currently or formerly employed by or working on behalf of the United States Government; and
- (ii) any foreign person that is a citizen or lawful resident of an ally of the United States that has not consented to ICC jurisdiction over that person or is not a state party to the Rome Statute, including:
 - a. current or former members of the armed forces of such ally of the United States;
 - b. current or former elected or appointed government officials of such ally of the United States; and
 - c. any other person currently or formerly employed by or working on behalf of such a government.

SECTION II – WARNINGS: (a) This License does not authorize any transactions related to the investigation, arrest, detention, and prosecution of a “protected person” by the ICC as defined pursuant to E.O. 14203.

(b) This License does not authorize the transfer of any blocked property, the debiting of any blocked account, the entry of any judgment or order that effects a transfer of blocked property, or the execution of any judgment against property blocked pursuant to any Executive order or Chapter V of Title 31 of the C.F.R.

(c) This License does not authorize the transfer to or receipt of funds or other property, directly or indirectly, from any entity or individual whose property or interests in property are blocked pursuant to any Executive order or Chapter V of Title 31 of the C.F.R.

(d) Any transfer of funds through the U.S. financial system pursuant to the authorization set forth above should reference the number of this License to avoid the rejection of the transfer.

SECTION III – RECORDKEEPING & REPORTING REQUIREMENTS: The Licensee(s) are subject to the recordkeeping and reporting requirements of, inter alia, 31 C.F.R. §§ 501.601 and 501.602, including the requirement to maintain full and accurate records concerning the transactions undertaken

pursuant to this License for a period of ten years from the date of each transaction. These records should be available upon demand and submitted to ofacreport@treasury.gov. Such records shall clearly demonstrate the applicability of the authorization set forth in **SECTION I** hereof.
