

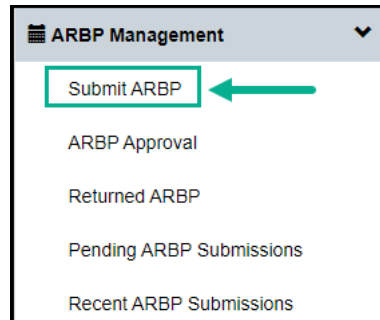
Updated July 3, 2023

Guidance on Filing the 2023 Annual Report of Blocked Property

The Office of Foreign Assets Control (OFAC) has compiled the following list of helpful tips for preparing the Annual Report of Blocked Property (ARBP). The ARBP is a comprehensive list of blocked property, and the filing requirement applies only to persons holding blocked property as of June 30 of a given year.

How to file the 2023 ARBP

- **For OFAC Reporting System (ORS) participants**, please file the completed ARBP through ORS by clicking on “Submit ARBP” located under ARBP Management.
 - If an ARBP submission is returned by OFAC due to missing or incomplete information, please refer to the instructions in the “Return Reason” field in ORS, amend the report accordingly, and resubmit the ARBP under the original ARBP ID in ORS.



- **For non-ORS participants**, please email the completed ARBP to OFACreport@treasury.gov with a clearly labeled subject line (e.g., *XYZ Company's 2023 ARBP*).

General Guidance

- [31 C.F.R. § 501.603\(b\)\(2\)\(i\)](#) requires persons holding blocked property as of June 30 of the current year to file the ARBP no later than September 30.
- ARBP filers are required to use the spreadsheet template “[Annual Report of Blocked Property Form](#)” (TDF 90-22.50). Previous versions of the ARBP form are no longer approved by the Office of Management and Budget and will not be accepted. However, requests to submit the information required pursuant to § 501.603(b)(2) in an alternate format will be considered by OFAC on a case-by-case basis.
- [31 C.F.R. § 501.603\(b\)\(2\)\(iii\)](#) requires ARBP filers who maintain blocked funds in omnibus accounts to provide a disaggregated list showing each blocked asset record contained within these accounts. Please list each discrete block in separate rows within Part B of the ARBP form.
- The term “blocked property” only applies to property that is blocked pursuant to OFAC authorities.
- The ARBP should only include information in the two spreadsheet tabs included in the ARBP form: Part A and Part B.

Do not include the following in the ARBP:

- Property that has been unblocked by general or specific license is not blocked property and should not be reported to OFAC in the ARBP.
- Property that has been unblocked because the blocked person originally associated with the property was no longer blocked before July 1, 2023.
- Property that has been unblocked as a result of a sanctions program being terminated (e.g., 31 C.F.R. part 543 (Côte d'Ivoire)) and is not currently blocked under any active sanctions program administered by OFAC.

- Restricted “Iranian accounts,” as defined in OFAC’s regulations, should not be reported to OFAC on the ARBP unless they are otherwise blocked. For additional information regarding Iranian accounts, please see 31 C.F.R. §§ [560.320](#), [560.427\(b\)](#), [560.517](#), and [Frequently Asked Question #37](#).

Tips for completing Part A - U.S. Person Holding Blocked Property

- Please ensure that sections 1, 2, and 3 of Part A are completed, and follow the instructions listed at the bottom of the first page of Part A on how to complete Part B. Do not include report information under the section labeled “Instructions for the Part B tab.”
- In Part A, Section (1), enter the name and address of the person holding the blocked property. Examples may include the name of a financial institution or a manufacturing company.
- In Part A, Section (2), provide the name and contact information of the individual empowered by the holding institution to file the ARBP.
- In Part A, Section (3), ensure that the total quantity of blocked property records reported equals the total quantity of blocked assets listed in Part B. In the example below, Part A, Section (3) lists the total quantity as “4,” which means that there should be four rows in Part B, each representing one blocked asset.

Part A, Section (3)		Part B	
<div> <div>(3) Enter the total quantity of accounts or items reported in the Part B tab:</div> <div>4</div> </div>		A	B
		Date of Blocking	Value (USD)
		1 1/6/2020	\$ 78.95
		2 2/6/2020	\$ 1,567.54
		3 4/15/2020	\$ 20,346.10
4 6/10/2020	\$ 18.97		
		Part A	Part B

Tips for completing Part B - Property Reported

Please review the section titled *Instructions for the Part B tab*, located in Part A of Form TDF 90–22.50 for instructions on completing Part B of the form. Below is additional information regarding certain data columns in Part B.

- **Date of Blocking** - Please enter the date of blocking in the following format: MM/DD/YYYY (e.g., 02/15/2023)
- **Value (USD)**
 - The actual, or if unknown, the estimated value of the property in U.S. Dollars as of June 30, 2023.
 - Transactions or property blocked in foreign currencies must be reported in U.S. Dollars with the foreign currency amount and notional exchange rate in the column titled *Additional Description of the Property*.
 - If the blocked property represents an outstanding loan, a credit card receivable, securities, real property, tangible, or other property with a negative balance, the amount blocked should be reported as \$0.00 (zero) with the balance owed on the blocked asset noted in the column titled *Additional Description of the Property*.


- For blocked securities or stocks, please list the quantity of shares in the column titled *Additional Description of the Property*.

- **Legal Authority or Authorities**

Identify the Part of Title 31 of the Code of Federal Regulations under which each asset is blocked, and the program tag(s) or regulation(s) associated with the blocked person. For a list of acceptable tags associated with active sanctions programs, please refer to OFAC's [Program Tag Definitions page](#). Please note that the term "SDN" is generic and cannot be used to identify the legal authority for blocking property.

- If an asset is blocked under multiple authorities, please list each program tag in one cell under the column titled *Legal Authority or Authorities*, separated by a semicolon. For example, if the sanctions target associated with the blocked asset is tagged with the sanctions programs IFSR, IRAN, SDGT, please enter "IFSR; IRAN; SDGT."

SDN on OFAC's Sanctions List Search


O F A C
 Office of Foreign Assets Control

Sanctions List Search

Name	Program(s)
BANK MELLI IRAN	IFSR; IRAN; SDGT

SDN and Legal Authorities in ARBP Part B

Legal Authority or Authorities	Sanctions Target
IFSR; IRAN; SDGT	BANK MELLI IRAN

- **Sanctions Target**

- Please include the associated sanctions target(s) whose property is blocked, such as a Specially Designated National ("SDN") or other blocked person. The spelling and ordering of a SDN name (last name first, first name last) must mirror the version published on [OFAC's Sanctions List Search](#) or the Federal Register. If the sanctions target is not evident, please include a narrative description of the interest(s) of the target(s) in the transaction. For example, if the property was blocked due to a nexus with a government blocked under OFAC authorities, please reference the relevant government (e.g., "Government of Iran," "Government of Syria," "Government of North Korea," "Government of Cuba").

Acceptable	Not acceptable
Sanctions Target	Sanctions Target
ADEMI, Xhevat	Xhevat ADEMI
[Last name, first name]	

- If the target is unknown, please reference the relevant identification number in any correspondence pursuant to which a blocking action was taken.

- **Asset Type** - Examples of an asset type include but are not limited to a wire transfer, money transfer, bank account, brokerage account, certificate of deposit, check, claim, collateral, credit card, deposits, letter of credit, standby letters of credit, insurance, prepaid card, real estate, safe deposit, savings, secure debt, secure equity, stocks, dividends, tangible property, and trade documents.
- **Account Type** - Examples of an account type include but are not limited to checking, demand deposit, certificate of deposit, money market, savings, stocks/dividends, time deposit, custody, cash, contract, sundry account, and escrow.
- **Account Numbers** - For blocked funds, include the account number associated with the account holding the blocked funds.
- **Additional Description of the Property (if needed)** - A brief but detailed description of the blocked property.
- **Location** - Include the city and country where the property is being held, in the columns titled *Location: City* and *Location: Country*.
- **New Item** - Please indicate “Y” for yes in rows involving new blocked property that was not previously reported in the ARBP. If this property was reported on the prior year's annual report, please indicate “N” for no.

Please do not merge cells in either Part A or Part B of the Excel spreadsheet. Additionally, please do not manipulate the content or order of the columns in Part B (e.g., amending the name the column titles, adding additional tabs). OFAC may return initial ARBP filings if the content or format does not comply with these standards.

For additional information regarding the ARBP or reporting requirements, please contact the Compliance Hotline at 1-800-540-6322 or send an email to OFACreport@treasury.gov.

This document is explanatory only and does not have the force of law. [31 C.F.R. part 501](#) contains the legally binding provisions governing these reporting requirements. This document does not supplement or modify the regulations.