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# COUNCIL REGULATION (EU) No 101/2011

## of 4 February 2011

## concerning restrictive measures directed against certain persons, entities and bodies in view of the situation in Tunisia

(OJ L 31, 5.2.2011, p. 1)

Amended by:

| | | Official Journal | | |
|---|---|---|---|---|
| | | No | page | date |
| ►M1 | Council Regulation (EU) No 1100/2012 of 26 November 2012 | L 327 | 16 | 27.11.2012 |
| ►M2 | Council Regulation (EU) No 517/2013 of 13 May 2013 | L 158 | 1 | 10.6.2013 |
| ►M3 | Council Implementing Regulation (EU) No 735/2013 of 30 July 2013 | L 204 | 23 | 31.7.2013 |
| ►M4 | Council Implementing Regulation (EU) No 81/2014 of 30 January 2014 | L 28 | 2 | 31.1.2014 |
| ►M5 | Council Implementing Regulation (EU) 2015/147 of 30 January 2015 | L 26 | 3 | 31.1.2015 |
| ►M6 | Council Implementing Regulation (EU) 2016/111 of 28 January 2016 | L 23 | 1 | 29.1.2016 |
| ►M7 | Council Implementing Regulation (EU) 2017/149 of 27 January 2017 | L 23 | 1 | 28.1.2017 |
| ►M8 | Council Implementing Regulation (EU) 2018/137 of 29 January 2018 | L 25 | 1 | 30.1.2018 |
| ►M9 | Council Implementing Regulation (EU) 2019/132 of 28 January 2019 | L 25 | 12 | 29.1.2019 |
| ►M10 | Commission Implementing Regulation (EU) 2019/1163 of 5 July 2019 | L 182 | 33 | 8.7.2019 |
| ►M11 | Council Implementing Regulation (EU) 2020/115 of 27 January 2020 | L 22 | 1 | 28.1.2020 |
| ►M12 | Council Implementing Regulation (EU) 2021/49 of 22 January 2021 | L 23 | 5 | 25.1.2021 |
| ►M13 | Council Implementing Regulation (EU) 2022/113 of 27 January 2022 | L 19 | 7 | 28.1.2022 |
| ►M14 | Council Regulation (EU) 2022/149 of 3 February 2022 | L 25 | 7 | 4.2.2022 |
| ►M15 | Commission Implementing Regulation (EU) 2022/595 of 11 April 2022 | L 114 | 60 | 12.4.2022 |
| ►M16 | Council Implementing Regulation (EU) 2022/1356 of 4 August 2022 | L 205 | 1 | 5.8.2022 |
| ►M17 | Council Implementing Regulation (EU) 2022/2073 of 27 October 2022 | L 280 | 1 | 28.10.2022 |
| ►M18 | Council Implementing Regulation (EU) 2023/156 of 23 January 2023 | L 22 | 8 | 24.1.2023 |
| ►M19 | Council Regulation (EU) 2023/2694 of 27 November 2023 | L 2694 | 1 | 28.11.2023 |

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# COUNCIL REGULATION (EU) No 101/2011

## of 4 February 2011

## concerning restrictive measures directed against certain persons, entities and bodies in view of the situation in Tunisia

*Article 1*

For the purposes of this Regulation, the following definitions shall apply:

(a) ‘funds’ means financial assets and benefits of every kind, including but not limited to:

(i) cash, cheques, claims on money, drafts, money orders and other payment instruments;

(ii) deposits with financial institutions or other entities, balances on accounts, debts and debt obligations;

(iii) publicly- and privately-traded securities and debt instruments, including stocks and shares, certificates representing securities, bonds, notes, warrants, debentures and derivatives contracts;

(iv) interest, dividends or other income on or value accruing from or generated by assets;

(v) credit, right of set-off, guarantees, performance bonds or other financial commitments;

(vi) letters of credit, bills of lading and bills of sale;

(vii) documents evidencing an interest in funds or financial resources;

(b) ‘freezing of funds’ means preventing any move, transfer, alteration, use of, access to, or dealing with funds in any way that would result in any change in their volume, amount, location, ownership, possession, character, destination or other change that would enable the funds to be used, including portfolio management;

(c) ‘economic resources’ means assets of every kind, whether tangible or intangible, movable or immovable, which are not funds but may be used to obtain funds, goods or services;

(d) ‘freezing of economic resources’ means preventing their use to obtain funds, goods or services in any way, including, but not limited to, by selling, hiring or mortgaging them;

(e) ‘territory of the Union’ means the territories of the Member States to which the Treaty is applicable, under the conditions laid down in the Treaty, including their airspace.

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*Article 2*

1. All funds and economic resources belonging to, owned, held or controlled by the natural or legal persons, entities and bodies who, in accordance with Article 1(1) of Decision 2011/72/CFSP, have been identified by the Council as being responsible for the misappropriation of Tunisian State funds, and natural or legal persons, entities and bodies associated with them, as listed in Annex I shall be frozen.

2. No funds or economic resources shall be made available, directly or indirectly, to or for the benefit of the natural or legal persons, entities or bodies listed in Annex I.

3. The participation, knowingly and intentionally, in activities the object or effect of which is, directly or indirectly, to circumvent the measures referred to in paragraphs 1 and 2 shall be prohibited.

▼M14

*Article 2a*

In the event of the decease of a person listed in Annex I:

(a) where a criminal conviction for the misappropriation of State funds was made against that person before his or her decease, the funds and economic resources which belonged to that person or which he or she owned, held or controlled shall continue to be frozen until court orders for the recovery of the misappropriated State funds and the payment of fines have been executed;

(b) where no such criminal conviction was made against that person before his or her decease, the funds and economic resources which belonged to that person or which he or she owned, held or controlled shall continue to be frozen for a reasonable period of time, subject to Article 12(5). If a civil or administrative action for the recovery of misappropriated State funds is brought within that period, the funds and economic resources which belonged to that person or which he or she owned, held or controlled shall remain frozen until such action is dismissed or, if it is upheld, until the court's order for the recovery of the misappropriated funds has been executed.

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*Article 3*

1. Annex I shall include the grounds for the listing of listed persons, entities and bodies.

2. Annex I shall also include, where available, information necessary to identify the natural or legal persons, entities and bodies concerned. With regard to natural persons, such information may include names including aliases, date and place of birth, nationality, passport and ID card numbers, gender, address, if known, and function or profession. With regard to legal persons, entities and bodies, such information may include names, place and date of registration, registration number and place of business.

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*Article 4*

1. By way of derogation from Article 2, the competent authorities in the Member States, as listed in Annex II, may authorise the release of certain frozen funds or economic resources, or the making available of certain funds or economic resources, under such conditions as they deem appropriate, after having determined that the funds or economic resources are:

(a) necessary to satisfy the basic needs of persons listed in Annex I, and their dependent family members, including payments for foodstuffs, rent or mortgage, medicines and medical treatment, taxes, insurance premiums, and public utility charges;

(b) intended exclusively for the payment of reasonable professional fees or the reimbursement of incurred expenses associated with the provision of legal services;

(c) intended exclusively for the payment of fees or service charges for routine holding or maintenance of frozen funds or economic resources; or

(d) necessary for extraordinary expenses, provided in this case that the Member State has notified the grounds on which it considers that a specific authorisation should be granted to all other Member States and to the Commission at least 2 weeks prior to authorisation.

2. The relevant Member State shall inform the other Member States and the Commission of any authorisation granted under paragraph 1.

▼M19

*Article 4a*

1. Article 2(1) and (2) shall not apply to the making available of funds or economic resources necessary to ensure the timely delivery of humanitarian assistance or to support other activities that support basic human needs where such assistance and other activities are carried out by:

(a) the United Nations (UN), including its programmes, funds and other entities and bodies, as well as its specialised agencies and related organisations;

(b) international organisations;

(c) humanitarian organisations having observer status with the UN General Assembly and members of those humanitarian organisations;

(d) bilaterally or multilaterally funded non-governmental organisations participating in the UN Humanitarian Response Plans, UN Refugee Response Plans, other UN appeals or humanitarian clusters coordinated by the UN Office for the Coordination of Humanitarian Affairs;

▼**M19**

(e) organisations and agencies to which the Union has granted the Humanitarian Partnership Certificate or which are certified or recognised by a Member State in accordance with national procedures;

(f) Member States' specialised agencies; or

(g) the employees, grantees, subsidiaries or implementing partners of the entities referred to in points (a) to (f) while and to the extent that they are acting in those capacities.

2. Without prejudice to paragraph 1, and by way of derogation from Article 2(1) and (2), the competent authorities of the Member States, as listed in Annex II, may authorise the release of certain frozen funds or economic resources, or the making available of certain funds or economic resources, under such conditions as they deem appropriate, after having determined that the provision of such funds or economic resources is necessary to ensure the timely delivery of humanitarian assistance or to support other activities that support basic human needs.

3. In the absence of a negative decision, a request for information or a notification for additional time from the relevant competent authority within five working days of the date of receipt of a request for authorisation under paragraph 2, that authorisation shall be considered granted.

4. The Member State concerned shall inform the other Member States and the Commission of any authorisations granted under paragraphs 2 and 3 within four weeks of such authorisation.

▼**M1**

*Article 5*

1. By way of derogation from Article 2, the competent authorities in Member States, as indicated on the websites listed in Annex II, may authorise the release of certain frozen funds or economic resources, provided the following conditions are met:

(a) the funds or economic resources are the subject of an arbitral decision rendered prior to the date on which the natural or legal person, entity or body referred to in Article 2 was listed in Annex I, or of a judicial or administrative decision rendered in the Union, or a judicial decision enforceable in the Member State concerned, prior to or after that date;

(b) the funds or economic resources will be used exclusively to satisfy claims secured by such a decision or recognised as valid in such a decision, within the limits set by applicable laws and regulations governing the rights of persons having such claims;

(c) the decision is not for the benefit of a natural or legal person, entity or body listed in Annex I; and

(d) recognising the decision is not contrary to public policy in the Member State concerned.

▼M1

2. The Member State concerned shall inform the other Member States and the Commission of any authorisation granted under this Article.

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*Article 6*

▼M1

1. Article 2(2) shall not apply to the addition to frozen accounts of:

(a) interest or other earnings on those accounts; or

(b) payments due under contracts, agreements or obligations that were concluded or arose before the date on which the natural or legal person, entity or body referred to in Article 2 has been listed in Annex I; or

(c) payments due under judicial, administrative or arbitral decisions rendered in the Union or enforceable in the Member State concerned,

provided that such interest, other earnings and payments are frozen in accordance with Article 2(1).

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2. Article 2(2) shall not prevent financial or credit institutions in the Union from crediting frozen accounts where they receive funds transferred to the account of a listed natural or legal person, entity or body, provided that any additions to such accounts will also be frozen. The financial or credit institution shall inform the relevant competent authority about any such transaction without delay.

*Article 7*

By way of derogation from Article 2 and provided that a payment by a person, entity or body listed in Annex I is due under a contract or agreement that was concluded by, or an obligation that arose for the person, entity or body concerned, before the date on which that person, entity or body had been designated, the competent authorities of the Member States, as indicated on the websites listed in Annex II, may authorise, under such conditions as they deem appropriate, the release of certain frozen funds or economic resources, if the following conditions are met:

(a) the competent authority concerned has determined that:

(i) the funds or economic resources shall be used for a payment by a person, entity or body listed in Annex I;

(ii) the payment is not in breach of Article 2(2);

(b) the Member State concerned has, at least 2 weeks prior to the grant of the authorisation, notified the other Member States and the Commission of that determination and its intention to grant an authorisation.

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*Article 8*

1. The freezing of funds and economic resources or the refusal to make funds or economic resources available, carried out in good faith on the basis that such action is in accordance with this Regulation, shall not give rise to liability of any kind on the part of the natural or legal person or entity or body implementing it, or its directors or employees, unless it is proved that the funds and economic resources were frozen or withheld as a result of negligence.

2. The prohibition set out in Article 2(2) shall not give rise to any liability of any kind on the part of the natural and legal persons, entities and bodies who made funds or economic resources available if they did not know, and had no reasonable cause to suspect, that their actions would infringe the prohibition in question.

*Article 9*

1. Without prejudice to the applicable rules concerning reporting, confidentiality and professional secrecy, natural and legal persons, entities and bodies shall:

(a) supply immediately any information which would facilitate compliance with this Regulation, such as accounts and amounts frozen in accordance with Article 2, to the competent authority in the Member State where they are resident or located, as indicated on the websites listed in Annex II, and shall transmit such information, either directly or through the Member States, to the Commission; and

(b) cooperate with that competent authority in any verification of this information.

2. Any information provided or received in accordance with this Article shall be used only for the purposes for which it was provided or received.

▼M1

3. Paragraph 2 shall not prevent Member States from sharing that information, in accordance with their national law, with the relevant authorities of Tunisia and other Member States where necessary for the purpose of assisting the recovery of misappropriated assets.

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*Article 10*

The Commission and Member States shall immediately inform each other of the measures taken under this Regulation and shall supply each other with any other relevant information at their disposal in connection with this Regulation, in particular information in respect of violation and enforcement problems and judgments handed down by national courts.

*Article 11*

The Commission shall be empowered to amend Annex II on the basis of information supplied by Member States.

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*Article 12*

1. Where the Council decides to subject a natural or legal person, entity or body to the measures referred to in Article 2(1), it shall amend Annex I accordingly.

2. The Council shall communicate its decision, including the grounds for the listing, to the natural or legal person, entity or body referred to in paragraph 1, either directly, if the address is known, or through the publication of a notice, providing such natural or legal person, entity or body with an opportunity to present observations.

3. Where observations are submitted, or where substantial new evidence is presented, the Council shall review its decision and inform the natural or legal person, entity or body accordingly.

4. The list in Annex I shall be reviewed at regular intervals and at least every 12 months.

▼M14

5. The Council shall amend the list in Annex I as necessary once it establishes that the conditions set out in Article 2a for maintaining the freezing of funds and economic resources which belonged to the deceased person or which he or she owned, held or controlled are no longer met.

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*Article 13*

1. Member States shall lay down the rules on penalties applicable to infringements of the provisions of this Regulation and shall take all measures necessary to ensure that they are implemented. The penalties provided for must be effective, proportionate and dissuasive.

2. Member States shall notify the Commission of those rules without delay after the entry into force of this Regulation and shall notify it of any subsequent amendment.

*Article 14*

Where there is, in this Regulation, a requirement to notify, inform or otherwise communicate with the Commission, the address and other contact details to be used for such communication shall be those indicated in Annex II.

*Article 15*

This Regulation shall apply:

(a) within the territory of the Union, including its airspace;

(b) on board any aircraft or any vessel under the jurisdiction of a Member State;

(c) to any person inside or outside the territory of the Union who is a national of a Member State;

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(d) to any legal person, entity or body which is incorporated or constituted under the law of a Member State;

(e) to any legal person, entity or body in respect of any business done in whole or in part within the Union.

*Article 16*

This Regulation shall enter into force on the day of its publication in the *Official Journal of the European Union*.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

▼M11

*ANNEX I*

A. List of persons and entities referred to in Article 2

| | Name | Identifying information | Grounds |
|---|---|---|---|
| 1. | Zine El Abidine Ben Haj Hamda Ben Haj Hassen BEN ALI | POB: Hammam-Sousse<br>DOB: 3 September 1936<br>Nationality: Tunisian<br>ID no: 00354671<br>Issuing country: Tunisia<br>Gender: male<br>Other information: deceased, ex-president of Tunisia, son of Selma HASSEN, married to Leïla TRABELSI | Person (deceased) whose activities are subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities in respect of the misappropriation of public monies by a public office-holder, misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person and for the offence of the receipt by a public official of public funds which he knew were not due, and used for the personal benefit of himself or members of his family. |
| 2. | Leïla Bent Mohamed Ben Rhouma TRABELSI | Nationality: Tunisian<br>POB: Tunis, Tunisia<br>DOB: 24 October 1956<br>ID no: 00683530<br>Issuing country: Tunisia<br>Gender: female<br>Other information: daughter of Saida DHERIF, married to Zine El Abidine BEN ALI | Person subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person, and for complicity in the offence of the receipt by a public official of public funds which he knew were not due, and used for the personal benefit of himself or members of his family. |
| ▼M18 3. | Moncef Ben Mohamed Ben Rhouma TRABELSI | Nationality: Tunisian<br>POB: Tunis, Tunisia<br>DOB: 4 March 1944<br>ID no: 05000799<br>Issuing country: Tunisia<br>Gender: male<br>Other information: deceased, managing director, son of Saida DHERIF, married to Yamina SOUIEI | Person (deceased) whose activities are subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person. |

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▼M11

| | Name | Identifying information | Grounds |
|---|---|---|---|
| ▼M17 — | | | |
| ▼M11 5. | Fahd Mohamed Sakher Ben Moncef Ben Mohamed Hfaiez MATERI | Nationality: Tunisian<br>POB: Tunis, Tunisia<br>DOB: 2 December 1981<br>ID no: 04682068<br>Issuing country: Tunisia<br>Gender: male<br>Other information: son of Naïma BOUTIBA, married to Nesrine BEN ALI | Person subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder (ex-President Ben Ali) to procure an unjustified advantage for a third party and to cause a loss to the administration, exerting wrongful influence over a public office-holder ex-President Ben Ali with a view to obtaining directly or indirectly an advantage for another person, and for complicity in the offence of the receipt by a public official of public funds which he knew were not due, and used for the personal benefit of himself or members of his family. |
| 6. | Nesrine Bent Zine El Abidine Ben Haj Hamda BEN ALI | Nationality: Tunisian<br>POB: Tunis, Tunisia<br>DOB: 16 January 1987<br>ID no: 00299177<br>Issuing country: Tunisia<br>Gender: female<br>Other information: daughter of Leïla TRABELSI, married to Fahd Mohamed Sakher MATERI | Person subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person and for complicity in the offence of the receipt by a public official of public funds which he knew were not due, and used for the personal benefit of himself or members of his family. |

▼M11

| | Name | Identifying information | Grounds |
|---|---|---|---|
| ▼M13 7. | Halima Bent Zine El Abidine Ben Haj Hamda BEN ALI | Nationality: Tunisian<br>POB: Tunis, Tunisia<br>DOB: 17 July 1992<br>Last known address: the Presidential Palace, Tunis, Tunisia<br>ID no: 09006300<br>Issuing country: Tunisia<br>Gender: female<br>Other information: daughter of Leïla TRABELSI | Person subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person, and associated with Leila Trabelsi (No 2). |
| ▼M11 8. | Belhassen Ben Mohamed Ben Rhouma TRABELSI | Nationality: Tunisian<br>POB: Tunis, Tunisia<br>DOB: 5 November 1962<br>Last known address: 32 rue Hédi Karray — El Menzah — Tunis, Tunisia<br>ID no: 00777029<br>Issuing country: Tunisia<br>Gender: male<br>Other information: managing director, son of Saida DHERIF | Person subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, and exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person. |
| ▼M18 9. | Mohamed Naceur Ben Mohamed Ben Rhouma TRABELSI | Nationality: Tunisian<br>POB: Tunis, Tunisia<br>DOB: 24 June 1948<br>Last known address: 20 rue El Achfat – Carthage – Tunis, Tunisia<br>ID no: 00104253<br>Issuing country: Tunisia<br>Gender: male<br>Other information: deceased, acting manager of an agricultural undertaking, son of Saida DHERIF, married to Nadia MAKNI | Person (deceased) whose activities are subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, and exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person. |

▼M11

| | Name | Identifying information | Grounds |
|---|---|---|---|
| 10. | Jalila Bent Mohamed Ben Rhouma TRABELSI | Nationality: Tunisian<br>POB: Radès<br>DOB: 19 February 1953<br>Last known address: 21 rue d'Aristote — Carthage Salammbô<br>ID no: 00403106<br>Issuing country: Tunisia<br>Gender: female<br>Other information: managing director, daughter of Saida DHERIF, married to Mohamed MAHJOUB | Person subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, and exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person. |
| 11. | Mohamed Imed Ben Mohamed Naceur Ben Mohamed TRABELSI | Nationality: Tunisian<br>POB: Tunis, Tunisia<br>DOB: 26 August 1974<br>Last known address: 124 avenue Habib Bourguiba -Carthage presidence<br>ID no: 05417770<br>Issuing country: Tunisia<br>Gender: male<br>Other information: businessman, son of Najia JERIDI | Person subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, and exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person. |
| ▼M18 12. | Mohamed Adel Ben Mohamed Ben Rehouma TRABELSI | Nationality: Tunisian<br>POB: Tunis, Tunisia<br>DOB: 26 April 1950<br>ID no: 00178522<br>Issuing country: Tunisia<br>Gender: male<br>Other information: deceased, managing director, son of Saida DHERIF, married to Souad BEN JEMIA | Person (deceased) whose activities are subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, and exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person. |

▼M18

| | Name | Identifying information | Grounds |
|---|---|---|---|
| 13. | Mohamed Mourad Ben Mohamed Ben Rehouma TRABELSI | Nationality: Tunisian<br>POB: Tunis, Tunisia<br>DOB: 25 September 1955<br>Last known address: 20 rue Ibn Chabat – Salammbô – Carthage – Tunis, Tunisia<br>ID no: 05150331<br>Issuing country: Tunisia<br>Gender: male<br>Other information: deceased, CEO, son of Saida DHERIF, married to Hela BELHAJ | Person (deceased) whose activities are subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, and exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person. |
| ▼M11 14. | Samira Bent Mohamed Ben Rhouma TRABELSI | Nationality: Tunisian<br>DOB: 27 December 1958<br>Last known address: 4 rue Taoufik EI Hakim — La Marsa<br>ID no: 00166569<br>Issuing country: Tunisia<br>Gender: female<br>Other information: sales director, daughter of Saida DHERIF, married to Mohamed Montassar MEHERZI | Person subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person, and for complicity in the offence of the receipt by a public official of public funds which he knew were not due, and used for the personal benefit of himself or members of his family. |
| 15. | Mohamed Montassar Ben Kbaier Ben Mohamed MEHERZI | Nationality: Tunisian<br>POB: La Marsa<br>DOB: 5 May 1959<br>Last known address: 4 rue Taoufik El Hakim-La Marsa<br>ID no: 00046988<br>Issuing country: Tunisia<br>Gender: male<br>Other information: CEO, son of Fatma SFAR, married to Samira TRABELSI | Person subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, and exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person. |

▼M11

| | Name | Identifying information | Grounds |
|---|---|---|---|
| 16. | Nefissa Bent Mohamed Ben Rhouma TRABELSI | Nationality: Tunisian<br>DOB: 1 February 1960<br>Last known address: 4 rue de la Mouette — Gammarth Supérieur<br>ID no: 00235016<br>Issuing country: Tunisia<br>Gender: female<br>Other information: daughter of Saida DHERIF, married to Habib ZAKIR | Person subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, and exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person. |
| 17. | Habib Ben Kaddour Ben Mustapha BEN ZAKIR | Nationality: Tunisian<br>DOB: 5 March 1957<br>Last known address: 4 rue Ennawras — Gammarth Supérieur<br>ID no:00547946<br>Issuing country: Tunisia<br>Gender: male<br>Other information: property developer, son of Saida BEN ABDALLAH, married to Nefissa TRABELSI | Person subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, and exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person. |
| 18. | Moez Ben Moncef Ben Mohamed TRABELSI | Nationality: Tunisian<br>POB: Tunis, Tunisia<br>DOB: 3 July 1973<br>Last known address: apartment block Amine El Bouhaira-rue du Lac Turkana-Les Berges du Lac-Tunis, Tunisia<br>ID no: 05411511<br>Issuing country: Tunisia<br>Gender: male<br>Other information: managing director; property developer, son of Yamina SOUIEI | Person subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, and exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person. |

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| | Name | Identifying information | Grounds |
|---|---|---|---|
| 19. | Lilia Bent Noureddine Ben Ahmed NACEF | Nationality: Tunisian<br>POB: Tunis, Tunisia<br>DOB: 25 June 1975<br>Last known address: 41 rue Garibaldi -Tunis, Tunisia<br>ID no: 05417907<br>Issuing country: Tunisia<br>Gender: female<br>Other information: managing director, daughter of Mounira TRABELSI (sister of Leïla TRABELSI), married to Mourad MEHDOUI | Person subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, and exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person. |
| 20. | Mourad Ben Hédi Ben Ali MEHDOUI | Nationality: Tunisian<br>POB: Tunis, Tunisia<br>DOB: 3 May 1962<br>Last known address: 41 rue Garibaldi — Tunis, Tunisia<br>ID no: 05189459<br>Issuing country: Tunisia<br>Gender: male<br>Other information: CEO, son of de Neila BARTAJI, married to Lilia NACEF | Person subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, and exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person. |
| ▼M18 21. | Houssem Ben Mohamed Naceur Ben Mohamed TRABELSI | Nationality: Tunisian<br>DOB: 18 September 1976<br>ID no: 05412560<br>Issuing country: Tunisia<br>Gender: male<br>Other information: CEO, son of Najia JERIDI | Person subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, and exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person. |

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| | Name | Identifying information | Grounds |
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| 24. | Mehdi Ben Ridha Ben Mohamed BEN GAIED | Nationality: Tunisian<br>DOB: 29 January 1988<br>Last known address: 4 rue Mohamed Makhlouf — El Manar.2-Tunis, Tunisia<br>Gender: male<br>Other information: CEO of Stafim Peugeot, son of de Kaouther Feriel HAMZA | Person subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, and exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person. |
| 25. | Mohamed Slim Ben Mohamed Hassen Ben Salah CHIBOUB | Nationality: Tunisian<br>DOB: 13 January 1959<br>Last known address: rue du Jardin — Sidi Bousaid — Tunis, Tunisia<br>ID no: 00400688<br>Issuing country: Tunisia<br>Gender: male<br>Other information: CEO, son of Leïla CHAIBI, married to Dorsaf BEN ALI | Person subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder (ex-President Ben Ali) to procure an unjustified advantage for a third party and to cause a loss to the administration, and exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person. |
| 26. | Dorsaf Bent Zine El Abidine Ben Haj Hamda BEN ALI | Nationality: Tunisian<br>POB: Le Bardo<br>DOB: 5 July 1965<br>Last known address: 5 rue El Montazah — Sidi Bousaid — Tunis, Tunisia<br>ID no: 00589759<br>Issuing country: Tunisia<br>Gender: female<br>Other information: daughter of Naïma EL KEFI, married to Mohamed Slim CHIBOUB | Person subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, and exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person. |

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| | Name | Identifying information | Grounds |
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| 27. | Sirine (Cyrine) Bent Zine El Abidine Ben Haj Hamda BEN ALI | Nationality: Tunisian<br>POB: Le Bardo<br>DOB: 21 August 1971<br>ID no:05409131<br>Issuing country: Tunisia<br>Passport no: x599070<br>Date of issue: November 2016<br>Date of expiry: 21 November 2021<br>Issuing country: Tunisia<br>Gender: female<br>Other information: daughter of Naïma EL KEFI, married to Mohamed Marwan MABROUK | Person subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, and exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person. |
| ▼M13 29. | Ghazoua Bent Zine El Abidine Ben Haj Hamda BEN ALI | Nationality: Tunisian<br>POB: Le Bardo<br>DOB: 8 March 1963<br>Last known address: 49 avenue Habib Bourguiba – Carthage, Tunisia<br>ID no: 00589758<br>Issuing country: Tunisia<br>Gender: female<br>Other information: medical doctor, daughter of Naïma EL KEFI, married to Slim ZARROUK | Person subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, and exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person, and associated with Slim Zarrouk (No 30). |

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| | Name | Identifying information | Grounds |
|---|---|---|---|
| 30. | Slim Ben Mohamed Salah Ben Ahmed ZARROUK | Nationality: Tunisian<br>POB: Tunis, Tunisia<br>DOB: 13 August 1960<br>Last known address: 49 avenue Habib Bourguiba — Carthage<br>ID no:00642271<br>Issuing country: Tunisia<br>Gender: male<br>Other information: CEO, son of Maherzia GUEDIRA, married to Ghazoua BEN ALI | Person subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, and exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person. |
| 31. | Farid Ben Haj Hamda Ben Haj Hassen BEN ALI | Nationality: Tunisian<br>POB: Hammam-Sousse<br>DOB: 22 November 1949<br>Last known address: 11 rue Sidi el Gharbi — Hammam-Sousse<br>ID no: 02951793<br>Issuing country: Tunisia<br>Gender: male<br>Other information: press photographer in Germany, son of Selma HASSEN | Person subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, and exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person. |
| 32. | Faouzi Ben Haj Hamda Ben Haj Hassen BEN ALI | Nationality: Tunisian<br>POB: Hammam-Sousse<br>DOB: 13 March 1947<br>Last known address: rue El Moez — Hammam-Sousse<br>ID no: 02800443<br>Issuing country: Tunisia<br>Gender: male<br>Other information: deceased, managing director, married to Zohra BEN AMMAR | Person (deceased) whose activities are subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, and exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person. |

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| | Name | Identifying information | Grounds |
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| 33. | Hayet Bent Haj Hamda Ben Haj Hassen BEN ALI | Nationality: Tunisian<br>POB: Hammam-Sousse<br>DOB: 16 May 1952<br>Last known address: 17 avenue de la République.- Hammam-Sousse<br>ID no: 02914657<br>Issuing country: Tunisia<br>Gender: female<br>Other information: Tunisair representative, daughter of Selma HASSEN, married to Fathi REFAT | Person subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, and exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person. |
| 34. | Najet Bent Haj Hamda Ben Raj Hassen BEN ALI | Nationality: Tunisian<br>POB: Sousse<br>DOB: 18 September 1956<br>Last known address: avenue de l'Imam Muslim-Khezama ouest-Sousse<br>ID no: 02804872<br>Issuing country: Tunisia<br>Gender: female<br>Other information: company manager, daughter of Selma HASSEN, married to Sadok Habib MHIRI | Person subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, and exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person. |

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| | Name | Identifying information | Grounds |
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| 35. | Slaheddine Ben Haj Hamda Ben Haj Hassen BEN ALI | Nationality: Tunisian<br>DOB: 28 October 1938<br>ID no: 02810614<br>Issuing country: Tunisia<br>Gender: male<br>Other information: deceased, son of Selma HASSEN, widower of Selma MANSOUR | Person (deceased) whose activities are subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, and exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person. |
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| 40. | Douraied Ben Hamed Ben Taher BOUAOUINA | Nationality: Tunisian<br>POB: Hammam-Sousse<br>DOB: 8 October 1978<br>Last known address: 17 avenue de la République — Hammam-Sousse<br>ID no: 05590835<br>Issuing country: Tunisia<br>Gender: male<br>Other information: company director, son of Hayet BEN ALI | Person subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, and exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person. |
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| | Name | Identifying information | Grounds |
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| 42. | Ghazoua Bent Hamed Ben Taher BOUAOUINA | Nationality: Tunisian<br>POB: Monastir<br>DOB: 30 August 1982<br>ID no: 08434380<br>Issuing country: Tunisia<br>Gender: female<br>Other information: daughter of Hayet BEN ALI, married to Badreddine BENNOUR | Person subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, and exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person, and associated with Hayet Ben Ali (No 33). |
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| ▼M16 | | | |
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| ▼M18 | | | |
| 46. | Mehdi Ben Tijani Ben Haj Hamda Ben Haj Hassen BEN ALI | Nationality: Tunisian, French<br>POB: Paris, France<br>DOB: 27 October 1966<br>ID no: 05515496<br>Issuing country: Tunisia<br>Gender: male<br>Other information: deceased, company director, son of Paulette HAZAT | Person (deceased) whose activities are subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder (ex-President Ben Ali) to procure an unjustified advantage for a third party and to cause a loss to the administration, and exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person. |

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| | Name | Identifying information | Grounds |
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| ▼M18 48. | Sofiene Ben Habib Ben Haj Hamda BEN ALI | Nationality: Tunisian<br>POB: Tunis, Tunisia<br>DOB: 28 August 1974<br>Last known address: 23 rue Ali Zlitni, El Manar 2 – Tunis, Tunisia<br>ID no: 04622472<br>Issuing country: Tunisia<br>Gender: male<br>Other information: deceased, sales director, son of Leila DEROUICHE | Person (deceased) whose activities are subject to judicial proceedings, or an asset recovery process following a final court ruling, by the Tunisian authorities for complicity in the misappropriation of public monies by a public office-holder, complicity in the misuse of office by a public office-holder to procure an unjustified advantage for a third party and to cause a loss to the administration, and exerting wrongful influence over a public office-holder with a view to obtaining directly or indirectly an advantage for another person. |

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B. Rights of defence and right to effective judicial protection under Tunisian law:

The rights of defence and the right to effective judicial protection

It follows from Articles 20, 27, 29 and 108 of the Tunisian constitution, Articles 13, 47, 50, 59, 66 and 175 of the Criminal Procedure Code and Law No 2002-52 of 3 June 2002 that the following rights are guaranteed under Tunisian law:

— to any individual suspected of or charged with a criminal offence:

1. the right to judicial review of any act or administrative decision;

2. the right to defend himself/herself in person or through legal assistance of his/her own choosing or, if he/she has not sufficient means to pay for legal assistance, to be given it free when the interests of justice so require;

— to any individual charged with a criminal offence:

1. the right to be informed promptly, in a language which he/she understands and in detail, of the nature and cause of the accusation against him/her;

2. the right to have adequate time and facilities for the preparation of his/her defence;

3. the right to examine or have examined witnesses against him/her and to obtain the attendance and examination of witnesses on his/her behalf under the same conditions as witnesses against him/her;

4. the right to have the free assistance of an interpreter if he/she cannot understand or speak the language used in court.

Application of the rights of defence and the right to effective judicial protection

1. Zine El Abidine Ben Haj Hamda Ben Haj Hassen BEN ALI

The investigation or trial relating to the misappropriation of public funds or assets is still ongoing.

The information on the Council's file shows that the rights of defence and the right to effective judicial protection were respected in the judicial proceedings on which the Council relied. This is demonstrated in particular by the fact that during the trials *in absentia* a lawyer was appointed by the Court to defend the interests of Mr Ben Ali.

2. Leïla Bent Mohamed Ben Rhouma TRABELSI

This person is absconding and is no longer present in Tunisia. The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The information on the Council's file shows that the rights of defence and the right to effective judicial protection were respected in the judicial proceedings on which the Council relied. This is demonstrated in particular by the fact that during the trials *in absentia* a lawyer was appointed by the Court to defend the interests of Ms Trabelsi.

3. Moncef Ben Mohamed Ben Rhouma TRABELSI

The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The information on the Council's file shows that the rights of defence and the right to effective judicial protection were respected in the judicial proceedings on which the Council relied. This is demonstrated in particular by the fact that on 5 March 2012 Mr Moncef Ben Mohamed Ben Rhouma Trabelsi was heard by an investigating judge in the presence of his lawyer.

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5. Fahd Mohamed Sakher Ben Moncef Ben Mohamed Hfaiez MATERI

This person is absconding and is no longer present in Tunisia. The investigation or trial relating to the misappropriation of public funds or assets is still ongoing.

The information on the Council's file shows that the rights of defence and the right to effective judicial protection were respected in the judicial proceedings on which the Council relied. This is demonstrated in particular by the fact that during the trials *in absentia* a lawyer was appointed by the Court to defend the interests of Mr Materi.

6. Nesrine Bent Zine El Abidine Ben Haj Hamda BEN ALI

This person is absconding and is no longer present in Tunisia. The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The information on the Council's file shows that the rights of defence and the right to effective judicial protection were respected in the judicial proceedings on which the Council relied. This is demonstrated in particular by the fact that during the trial *in absentia* Ms Ben Ali was represented by a lawyer.

7. Halima Bent Zine El Abidine Ben Haj Hamda BEN ALI

This person is absconding and is no longer present in Tunisia. The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The Council has found no indication that the rights of defence or the right to effective judicial protection of Ms Halima Bent Zine El Abidine Ben Haj Hamda Ben Ali were not respected.

8. Belhassen Ben Mohamed Ben Rhouma TRABELSI

This person is absconding and is no longer present in Tunisia. The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The information on the Council's file shows that the rights of defence and the right to effective judicial protection were respected in the judicial proceedings on which the Council relied. This is demonstrated in particular by a written commitment made by the Tunisian authorities to the Swiss authorities on 7 April 2014, in the context of the implementation of a letter rogatory, to respect the fundamental rights of Mr Belhassen Ben Mohamed Ben Rhouma TRABELSI and his rights of defence.

9. Mohamed Naceur Ben Mohamed Ben Rhouma TRABELSI

The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The information on the Council's file shows that the rights of defence and the right to effective judicial protection were respected in the judicial proceedings on which the Council relied. This is demonstrated in particular by the fact that on 13 March 2012 and 16 March 2012 Mr Mohamed Naceur Ben Mohamed Ben Rhouma Trabelsi was heard by an investigating judge in the presence of his lawyer.

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10. Jalila Bent Mohamed Ben Rhouma TRABELSI

The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The information on the Council's file shows that the rights of defence and the right to effective judicial protection were respected in the judicial proceedings on which the Council relied. This is demonstrated in particular by the fact that on 5 January 2012, 5 July 2012 and 27 February 2013 Ms Jalila Bent Mohamed Ben Rhouma Trabelsi was heard by an investigating judge in the presence of her lawyer.

11. Mohamed Imed Ben Mohamed Naceur Ben Mohamed TRABELSI

The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The information on the Council's file shows that the rights of defence and the right to effective judicial protection were respected in the judicial proceedings on which the Council relied. This is demonstrated in particular by the fact that on 27 October 2016 Mr Mohamed Imed Ben Mohamed Naceur Ben Mohamed Trabelsi was heard by an investigating judge in the presence of his lawyer.

12. Mohamed Adel Ben Mohamed Ben Rehouma TRABELSI

This person is absconding and is no longer present in Tunisia. The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The Council has found no indication that the rights of defence or the right to effective judicial protection of Mr Mohamed Adel Ben Mohamed Ben Rehouma Trabelsi were not respected.

13. Mohamed Mourad Ben Mohamed Ben Rehouma TRABELSI

The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The information on the Council's file shows that the rights of defence and the right to effective judicial protection were respected in the judicial proceedings on which the Council relied. This is demonstrated in particular by the fact that on 23 February 2012 Mr Mohamed Mourad Ben Mohamed Ben Rehouma Trabelsi was heard by an investigating judge in the presence of his lawyer.

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14. Samira Bent Mohamed Ben Rhouma TRABELSI

The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The information on the Council's file shows that the rights of defence and the right to effective judicial protection were respected in the judicial proceedings on which the Council relied. This is demonstrated in particular by the fact that, on 11 August 2011, Ms Samira Bent Mohamed Ben Rhouma TRABELSI was heard by an investigating judge in the presence of her lawyer.

▼**M11**

15. Mohamed Montassar Ben Kbaier Ben Mohamed MAHERZI

The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The information on the Council's file shows that the rights of defence and the right to effective judicial protection were respected in the judicial proceedings on which the Council relied. This is demonstrated in particular by the fact that on 20 August 2011 and 2 October 2012 and 31 May 2013 Mr Mohamed Montassar Ben Kbaier Ben Mohamed Maherzi was heard by an investigating judge in the presence of his lawyers.

16. Nefissa Bent Mohamed Ben Rhouma TRABELSI

The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The information on the Council's file shows that the rights of defence and the right to effective judicial protection were respected in the judicial proceedings on which the Council relied. This is demonstrated in particular by the fact that on 24 January 2012 Ms Nefissa Bent Mohamed Ben Rhouma Trabelsi was heard by an investigating judge in the presence of her lawyer.

▼**M11**

17. Habib Ben Kaddour Ben Mustapha BEN ZAKIR

The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The information on the Council's file shows that the rights of defence and the right to effective judicial protection were respected in the judicial proceedings on which the Council relied. This is demonstrated in particular by the fact that on 24 January 2012 Mr Habib Ben Kaddour Ben Mustapha Ben Zakir was heard by an investigating judge in the presence of his lawyer.

18. Moez Ben Moncef Ben Mohamed TRABELSI

This person is absconding and is no longer present in Tunisia. The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The Council has found no indication that the rights of defence or the right to effective judicial protection of Mr Moez Ben Moncef Ben Mohamed Trabelsi were not respected.

19. Lilia Bent Noureddine Ben Ahmed NACEF

The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The information on the Council's file shows that the rights of defence and the right to effective judicial protection were respected in the judicial proceedings on which the Council relied. This is demonstrated in particular by the fact that on 20 February 2012 Ms Lilia Bent Noureddine Ben Ahmed Nacef was heard by an investigating judge in the presence of her lawyers and by the fact that she was assisted by lawyers in the hearings before the Courts and that she availed herself of the right to appeal the first instance ruling.

20. Mourad Ben Hédi Ben Ali MEHDOUI

The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The information on the Council's file shows that the rights of defence and the right to effective judicial protection were respected in the judicial proceedings on which the Council relied. This is demonstrated in particular by the fact that on 13 February 2012 Mr Mourad Ben Hédi Ben Ali Mehdoui was heard by an investigating judge in the presence of his lawyer.

21. Houssem Ben Mohamed Naceur Ben Mohamed TRABELSI

The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The information on the Council's file shows that the rights of defence and the right to effective judicial protection were respected in the judicial proceedings on which the Council relied. This is demonstrated in particular by the fact that on 2 March 2012 Mr Houssem Ben Mohamed Naceur Ben Mohamed Trabelsi was heard by an investigating judge in the presence of his lawyer.

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24. Mehdi Ben Ridha Ben Mohamed BEN GAIED

The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The information on the Council's file shows that the rights of defence and the right to effective judicial protection were respected in the judicial proceedings or asset recovery process on which the Council relied. This is demonstrated in particular by the fact that on 22 September 2011 Mr Mehdi Ben Ridha Ben Mohamed Ben Gaied was heard by an investigating judge in the presence of his lawyer.

25. Mohamed Slim Ben Mohamed Hassen Ben Salah CHIBOUB

The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The information on the Council's file shows that the rights of defence and the right to effective judicial protection were respected in the judicial proceedings or asset recovery process on which the Council relied. This is demonstrated in particular by the fact that (i) on 24 November 2014, 12 January 2015, 10 April 2015 and 2 December 2015 Mr Mohamed Slim Ben Mohamed Hassen Ben Salah Chiboub was heard in several cases by an investigating judge in the presence of his lawyers; (ii) the investigation against Mr Chiboub in Case 27638/6 was terminated on 30 March 2018 for lack of evidence and the decision to terminate the investigation was later confirmed on appeal; and (iii) Mr Chiboub was assisted by a lawyer during the arbitration proceedings before the Arbitration Committee of the Instance de la Vérité et de la Dignité (IVD). ►**M13** On 15 February 2021 and 10 March 2021, Mr CHIBOUB was heard by an investigating judge in case 19592/1. On 31 March 2021, the investigating judge decided to sever his case from the general case 19592/1. Case 1137/2 is pending. ◄

26. Dorsaf Bent Zine El Abidine Ben Haj Hamda BEN ALI

The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The information on the Council's file shows that the rights of defence and the right to effective judicial protection were respected in the judicial proceedings on which the Council relied. This is demonstrated in particular by the fact that on 4 October 2011 Ms Dorsaf Bent Zine El Abidine Ben Haj Hamda Ben Ali was heard by an investigating judge in the presence of her lawyer. ►**M13** On 31 March 2021, the investigating judge decided to sever her case from the general case 19592/1. Case 1137/2 is pending. ◄

27. Sirine Bent Zine El Abidine Ben Haj Hamda BEN ALI

The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The information on the Council's file shows that the rights of defence and the right to effective judicial protection were respected in the judicial proceedings on which the Council relied. This is demonstrated in particular by the fact that on 6 March 2012 Ms Sirine Bent Zine El Abidine Ben Haj Hamda Ben Ali was heard by an investigating judge in the presence of her lawyer.

29. Ghazoua Bent Zine El Abidine Ben Haj Hamda BEN ALI

The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The information on the Council's file shows that the rights of defence and the right to effective judicial protection were respected in the judicial proceedings on which the Council relied. This is demonstrated in particular by the fact that on 5 October 2011 and 18 October 2012 Ms Ghazoua Bent Zine El Abidine Ben Haj Hamda Ben Ali was heard by an investigating judge in the presence of her lawyer.

▼**M11**

30. Slim Ben Mohamed Salah Ben Ahmed ZARROUK

The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. Following an application by Mr Zarrouk, the Arbitration Committee of the Instance de la Vérité et de la Dignité (IVD) handed down an arbitration decision which was confirmed by the Conseil de l'IVD on 24 December 2018. This decision was challenged before the Court of Cassation. The case is pending. The information on the Council's file shows that the rights of defence and the right to effective judicial protection were respected in the judicial proceedings or asset recovery process on which the Council relied. This is demonstrated in particular by the fact that on 16 January 2012, 1 February 2012 and 22 June 2017 Mr Slim Ben Mohamed Salah Ben Ahmed Zarrouk was heard by an investigating judge in the presence of his lawyer. ►**M13** A judgment of the Appeal Court of Tunis dated 15 April 2021 in case 29443 convicted him of misappropriation of public funds. ◄

31. Farid Ben Haj Hamda Ben Haj Hassen BEN ALI

The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The information on the Council's file shows that the rights of defence and the right to effective judicial protection were respected in the judicial proceedings on which the Council relied. This is demonstrated in particular by the fact that on 3 October 2011 Mr Farid Ben Haj Hamda Ben Haj Hassen Ben Ali was heard by an investigating judge in the presence of his lawyer. ►**M13** A judgment of the Appeal Court of Tunis dated 1 November 2018 in case 27658 convicted him of misappropriation of public funds. ◄

32. Faouzi Ben Haj Hamda Ben Haj Hassen BEN ALI

The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The Council has found no indication that the rights of defence or the right to effective judicial protection of Mr Faouzi Ben Haj Hamda Ben Haj Hassen Ben Ali were not respected.

33. Hayet Bent Haj Hamda Ben Haj Hassen BEN ALI

The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The information on the Council's file shows that the rights of defence and the right to effective judicial protection were respected in the judicial proceedings on which the Council relied. This is demonstrated in particular by the fact that on 19 October 2011 Ms Hayet Bent Haj Hamda Ben Haj Hassen Ben Ali was heard by an investigating judge in the presence of her lawyer. ►**M13** A judgment dated 14 March 2019 in case 40800 convicted her of misappropriation of public funds. ◄

34. Najet Bent Haj Hamda Ben Haj Hassen BEN ALI

The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The information on the Council's file shows that the rights of defence and the right to effective judicial protection were respected in the judicial proceedings on which the Council relied. This is demonstrated in particular by the fact that on 21 November 2011 Ms Najet Bent Haj Hamda Ben Haj Hassen Ben Ali was heard by an investigating judge in the presence of her lawyer. ►**M13** A judgment dated 7 January 2016 in case 28264 convicted her of misappropriation of public funds. ◄

35. Slaheddine Ben Haj Hamda Ben Haj Hassen BEN ALI

The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The information on the Council's file shows that the rights of defence and the right to effective judicial protection were respected in the judicial proceedings on which the Council relied. This is demonstrated in particular by the fact that on 13 January 2012 Mr Slaheddine Ben Haj Hamda Ben Haj Hassen Ben Ali was heard by an investigating judge in the presence of his lawyer.

▼**M17**

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▼**M11**

40. Douraied Ben Hamed Ben Taher BOUAOUINA

The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The information on the Council's file shows that the rights of defence and the right to effective judicial protection were respected in the judicial proceedings on which the Council relied. This is demonstrated in particular by the fact that on 21 April 2012 Mr Douraied Ben Hamed Ben Taher Bouaouina was heard by an investigating judge in the presence of his lawyer.

▼**M12**

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▼**M11**

42. Ghazoua Bent Hamed Ben Taher BOUAOUINA

The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The information on the Council's file shows that the rights of defence and the right to effective judicial protection were respected in the judicial proceedings on which the Council relied. This is demonstrated in particular by the fact that on 19 October 2011 and 25 October 2011 Ms Ghazoua Bent Hamed Ben Taher Bouaouina was heard by an investigating judge in the presence of her lawyer.

▼**M17**

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▼**M16**

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▼**M11**

46. Mehdi Ben Tijani Ben Haj Hamda Ben Haj Hassen BEN ALI

This person is absconding and is no longer present in Tunisia. The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The Council has found no indication that the rights of defence or the right to effective judicial protection of Mr Mehdi Ben Tijani Ben Haj Hamda Ben Haj Hassen Ben Ali were not respected. ►**M13** A judgment of the Court of first instance of Tunis dated 21 March 2019 in case 41328/19 convicted him of misappropriation of public funds. ◄

▼**M12**

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▼**M11**

48. Sofiene Ben Habib Ben Haj Hamda BEN ALI

The investigation or trial relating to the misappropriation of public funds or assets is still ongoing. The information on the Council's file shows that the rights of defence and the right to effective judicial protection were respected in the judicial proceedings on which the Council relied. This is demonstrated in particular by the fact that on 22 March 2012 Mr Sofiene Ben Ali was heard by an investigating judge in the presence of his lawyers.

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*ANNEX II*

**LIST OF COMPETENT AUTHORITIES IN THE MEMBER STATES REFERRED TO IN ARTICLES 4(1) AND 5(1), ARTICLE 7 AND ARTICLE 9(1)(a) AND ADDRESS FOR NOTIFICATIONS TO THE EUROPEAN COMMISSION**

▼M15

BELGIUM

https://diplomatie.belgium.be/en/policy/policy_areas/peace_and_security/sanctions

BULGARIA

https://www.mfa.bg/en/EU-sanctions

CZECHIA

www.financnianalytickyurad.cz/mezinarodni-sankce.html

DENMARK

http://um.dk/da/Udenrigspolitik/folkeretten/sanktioner/

GERMANY

https://www.bmwi.de/Redaktion/DE/Artikel/Aussenwirtschaft/embargos-aussenwirtschaftsrecht.html

ESTONIA

https://vm.ee/et/rahvusvahelised-sanktsioonid

IRELAND

https://www.dfa.ie/our-role-policies/ireland-in-the-eu/eu-restrictive-measures/

GREECE

http://www.mfa.gr/en/foreign-policy/global-issues/international-sanctions.html

SPAIN

https://www.exteriores.gob.es/es/PoliticaExterior/Paginas/SancionesInternacionales.aspx

FRANCE

http://www.diplomatie.gouv.fr/fr/autorites-sanctions/

CROATIA

https://mvep.gov.hr/vanjska-politika/medjunarodne-mjere-ogranicavanja/22955

ITALY

https://www.esteri.it/it/politica-estera-e-cooperazione-allo-sviluppo/politica_europea/misure_deroghe/

CYPRUS

https://mfa.gov.cy/themes/

LATVIA

http://www.mfa.gov.lv/en/security/4539

LITHUANIA

http://www.urm.lt/sanctions

LUXEMBOURG

https://maee.gouvernement.lu/fr/directions-du-ministere/affaires-europeennes/organisations-economiques-int/mesures-restrictives.html

HUNGARY

https://kormany.hu/kulgazdasagi-es-kulugyminiszterium/ensz-eu-szankcios-tajekoztato

MALTA

https://foreignandeu.gov.mt/en/Government/SMB/Pages/SMB-Home.aspx

NETHERLANDS

https://www.rijksoverheid.nl/onderwerpen/internationale-sancties

▼**M15**

AUSTRIA

https://www.bmeia.gv.at/themen/aussenpolitik/europa/eu-sanktionen-nationale-behoerden/

POLAND

https://www.gov.pl/web/dyplomacja/sankcje-miedzynarodowe

https://www.gov.pl/web/diplomacy/international-sanctions

PORTUGAL

https://www.portaldiplomatico.mne.gov.pt/politica-externa/medidas-restritivas

ROMANIA

http://www.mae.ro/node/1548

SLOVENIA

http://www.mzz.gov.si/si/omejevalni_ukrepi

SLOVAKIA

https://www.mzv.sk/europske_zalezitosti/europske_politiky-sankcie_eu

FINLAND

https://um.fi/pakotteet

SWEDEN

https://www.regeringen.se/sanktioner

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