

FREE PREVIEW EDITION

The Six Screens

TISORO 2026 ELIGIBILITY REPORT: CITIZENSHIP BY INVESTMENT

By Nationality

Authored By Syed Savez Ali
with TG CoAuth

Six Screens to Citizenship by Investment, Tisoro Eligibility Report 2026

Free Preview Edition

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Authored by Syed Savez Ali — Editor-in-Chief & News Director, with TG CoAuth.

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Foreword

Dear reader,

The short answer to the question this e-book asks is that no single rulebook decides whether a family can obtain a second citizenship by investment. Six sets of rules do, they sit in different capitals, and they are applied in an order most families only discover after the first one has already cost them time.

I started this project expecting to find a clean table of who applies from where. There isn't one. The units that sell these passports publish far less about their applicants than their volumes suggest, and I've tried to treat each gap as a finding, not an embarrassment. Where a number didn't exist, I said so. Where two official sources disagreed, I set them side by side.

What surprised me most was the direction of pressure. The decisions that matter most to a passport's value in 2026 are being made in Brussels, London and Washington, long after an application is approved. A family can do everything right at the unit and still hold a passport whose reach is shrinking.

This e-book is written for families of high-net-worth individuals weighing a second citizenship, and for the advisors, bankers and policy readers who follow demand by source market. It describes categories and the logic of selection. It doesn't tell any family which program to pick, and no government's decision rests on anything written here.

Read the chapters in order if you can. Each screen is written to stand alone, but the interactions between them are where the surprises are. I'd rather you finished it knowing which questions to ask than believing you'd been handed an answer.

With thanks for your time,

Syed Savez Ali

Editor-in-Chief & News Director, Tisoro Intelligence

How to Read This Report

This e-book answers one question, and it's worth saying it plainly before you turn the page: which rules decide whether a family can obtain a [second citizenship](#) through investment, and in what order do they bite? Everything that follows hangs on that.

Six screens, in sequence

The core chapters are built around six eligibility screens: program access, sanctions and due diligence, home-country law, source of funds, visa and travel history, and family structure with status documents. They run in that order because an early failure usually makes the later ones moot. A family that can't clear a sanctions screen gains nothing from a tidy family tree. You can read straight through, or jump to the screen that worries you most. Each chapter opens with its finding, so you'll know within a sentence whether to keep going.

How the evidence is marked

Every figure carries its source, its date and a grade. **Confirmed** means an official page or primary text states it. **Announced** means an authority has said it will happen but it isn't yet in force. **Reported** means press or secondary accounts carry it and no official page was found. Where nobody publishes a number, the text says so instead of guessing, and that happens more often than you might expect, particularly for demand by passport.

What this e-book is not

It doesn't recommend a program, a firm or a route for any particular profile. It describes categories and the logic of selection, and the issuing government makes every decision. Open-program counts describe what is listed as open on a given date, not an outcome for any applicant.

Treat each screen as a question the evidence can answer, and treat each gap in the data as a finding in its own right.

The Methodology Note near the end sets out the source hierarchy in full, and the Sources and Citations page lists every origin by name.

Executive Summary and Key Findings

The rule with the most leverage over a second citizenship in 2026 sits outside the issuing unit: the EU, the UK and the United States now decide what an Eastern Caribbean passport is worth, and the most consequential EU item, a request for phase-out by June 1, 2028, is stated by one government and unpublished by the Commission. Behind that headline, this e-book finds six screens that decide eligibility in sequence, a public record too thin to size demand by passport, and rules that collide across jurisdictions. Findings are bolded below, each with its source.

Key findings

- **Destination decisions now bind.** Regulation (EU) 2025/2441 has listed investor citizenship schemes without genuine link as a suspension ground since December 30, 2025, the UK imposed visas on Saint Lucia on March 5, 2026, and US Proclamation 10998 applies to Antigua and Barbuda and Dominica from January 1, 2026 (EUR-Lex; UK Home Office, HC 1691; White House).
- **Demand by passport is largely unpublished.** Two of eight units split applicants by passport or birth country, and the Commission counted 13,113 applications in 2023 and 10,573 in 2024 with 2024 rejection rates of 1.7 to 43.9 percent (European Commission, COM(2025) 792; SWD(2025) 429).
- **Access runs from 3 to 8 of the 8 programs** by passport, and published exclusion lists explain only part of it (Tisoro, Citizenship by Nationality; Commission SWD(2025) 429).
- **Sanctions screening follows every nationality of record.** OFAC's October 1, 2026 entries list nationality Iran and alt. nationality Dominica without saying how the second was acquired (US Treasury, OFAC).
- **Home-country law can end the first passport:** by voluntary acquisition in China and India, by failure to renounce in Pakistan, without permission in Egypt and Syria, and with a 60-day notice duty in Russia (Chapter 4 sources).
- **Funds rules differ by market:** a US\$50,000 documentation threshold in China, US\$250,000 a year in India, and capped monthly releases of US\$1,000 or US\$500 in Lebanon (SAFE; Reserve Bank of India; Banque du Liban).
- **Family definitions conflict.** Qualifying children run from 21 to 30 and parents from 50, 55 or 65, and pages and gazettes disagree in three units (Chapter 7 sources).
- **The grant isn't the end.** St Kitts and Nevis revoked the citizenship of 13 individuals and dependents in March 2025, and Türkiye reported 6,134 cancellations in 2026 (SKNIS, April 7, 2025; Türkiye Interior Ministry, as reported).
- **Intermediaries are the least precisely regulated layer.** No unit text read caps agent commissions, though Dominica and St Kitts and Nevis bar pricing below the minimum (Dominica, S.R.O. 8 of 2024; St Kitts and Nevis, S.R.O. 20 of 2024).

Reading the cycle

Three grades organize the evidence: confirmed, announced and reported, defined in Chapter 10. Most of what could change the picture next is pending as of October 26, 2026, including a reported November 12 commitment date, a ninth Commission report expected in December and the FATF's October 30 outcomes. *The stable findings are in statute; the unstable ones are in other governments' decisions.* Chapters 2 to 7 take each screen in turn, and the compliance and cross-cutting sections show how they fit.

The Field in Context: Eight Citizenship Programs and the Six Screens

Eight governments sell citizenship in return for investment, yet only two of their issuing bodies publish any split of applicants by passport or birth country, and neither splits approvals. That gap sits under everything in this e-book. A family asking whether its own passport is welcome has to piece the answer together from partial unit reports, a handful of European Commission tables, exclusion lists and the home country's own law. *The field is easier to describe by what it withholds than by what it reports.*

Eight programs, one shared question

The e-book counts eight citizenship programs. Five are Eastern Caribbean units, one is in Türkiye, one in the Pacific and one off the coast of Central Africa. They differ in price, legal basis and how much they say in public.

- [Antigua and Barbuda](#) issues six-monthly unit reports, the latest covering January 1 to June 30, 2024 (Antigua and Barbuda CIU, Six-Monthly Report, January 1 to June 30, 2024). The unit's own site showed no suspension notice in late October 2026 (Antigua and Barbuda CIU, cip.gov.ag).
- [Dominica](#) publishes a page of banned and conditionally restricted nationalities, last modified March 31, 2026, but no statistics page was found (Dominica CBIU, Banned Nationalities).
- [Grenada](#) posts quarterly statistics, and on September 22, 2026 its agency announced an independent review of the program (Investment Migration Agency Grenada, Reports and Statistics; homepage notice).
- [St Kitts and Nevis](#) excludes six countries by statutory order, SRO No. 27 of 2023 (St Kitts and Nevis CIU, Eligibility Criteria and SRO No. 27 of 2023).
- [Saint Lucia](#) publishes annual reports with application totals; its official news page showed nothing newer than 2023 (Saint Lucia CIU, Economic Citizenship Statistics; Saint Lucia CIU, news page).
- [Türkiye](#) grants citizenship by Presidential decision under Article 12(1)(b) of Law No. 5901, with a real estate threshold of USD 400,000 and USD 500,000 for deposits, bonds, fund shares and fixed capital investment (Presidency Investment Office of Türkiye, Acquiring Property and Citizenship, updated August 11, 2026).
- [Vanuatu](#) lists government fees from USD 130,000 for a single applicant under its Development Support Program, though its portal gives no statement on current intake (Vanuatu Citizenship Office, Fees and Charges).
- [São Tomé and Príncipe](#) operates under Nationality Law No. 07/2022 and Decree-Law No. 07/2025, with USD 90,000 stated for an individual applicant (STP-Press, August 12, 2025).

The Vanuatu line deserves a plain note. The portal carries no closure notice and no confirmation that intake is open, so this e-book treats current intake as unconfirmed and says so wherever it matters.

Six screens, in the order they bite

The screens that organize the chapters ahead are an editorial device, not a legal sequence. They follow the order in which a failure ends the process cheaply. Program access comes first, because a program that doesn't accept a passport makes every later question academic. Sanctions and due diligence follow, then home-country law, source of funds, visa and travel history, and finally family structure and status documents.

The ordering also tracks what international bodies flag. The FATF and OECD joint report of November 22, 2023 defines citizenship by investment as citizenship granted principally or solely for financial investment, without a requirement of significant prior physical residency, and names frequent use of intermediaries, many government agencies and weak governance among the vulnerabilities (OECD/FATF, Misuse of Citizenship and Residency by Investment Programmes, 2023; FATF publication page). Those are the very points at which screens two, four and six do their work.

What the issuing bodies actually publish

Antigua and Barbuda reports applications by country of birth, not nationality, and counts applications rather than people. Grenada gives rounded percentage shares of applications received, with no counts by passport, in a quarterly series that runs through the first quarter of 2026 (Investment Migration Agency Grenada, Q4 2025 and Q1 2026 Statistics Reports). Saint Lucia's latest annual report, for the year ended March 31, 2025, gives totals of applications received, granted, denied and processed but no country breakdown (Saint Lucia CIU, Annual Report 2024-25). The panel below sets the eight side by side.

	Breakdown by passport or birth country	Latest period covered	Form
Antigua and Barbuda	Yes, country of birth	To June 30, 2024	Counts and percentages
Dominica	None found	Not applicable	No statistics page found
Grenada	Yes, by nationality	First quarter 2026	Rounded percentages, no counts
St Kitts and Nevis	None found	Not applicable	No nationality statistics found
Saint Lucia	No, totals only	To March 31, 2025	Received, granted, denied, processed
Vanuatu	None found	Not applicable	No nationality statistics
Türkiye	None as regular series	Not applicable	No official breakdown found
São Tomé and Príncipe	None found	Not applicable	No official statistics found

■ Breakdown published ■ Partial form (percentages only) ■ No breakdown by passport or birth country
■ Period or content stated ■ Not applicable

Both published breakdowns cover applications received, not approvals. The European Commission's country-supplied tables add a partial third channel that is not shown here. Period labels are shortened from the figure.

What each issuing body publishes on applicants by passport or birth country

Source: Antigua and Barbuda CIU Six-Monthly Report (to June 30, 2024); Investment Migration Agency Grenada Q4 2025 and Q1 2026 Statistics Reports; Saint Lucia CIU Annual Report 2024-25; Dominica CBIU; St Kitts and Nevis CIU; Vanuatu Citizenship Office; Presidency Investment Office of Türkiye; STP-Press (August 12, 2025). Situation as published at October 2026.

The European Commission is the third channel. Its seventh Visa Suspension Mechanism report, adopted December 6, 2024, reproduces country-supplied data on successful applicants by nationality, but only for each program's top five, and it warns that the data set is not complete and contains inconsistencies (European Commission, Seventh Report under the Visa Suspension Mechanism, COM(2024) 571, footnotes 33 and 34). Chapter 1 reads those tables line by line. For now, the point is structural: the best available demand evidence by passport is partial, dated and mixed in kind.

Why Brussels sets the frame

The EU's position has hardened in a few steps. On April 29, 2025 the Court of Justice held, in Case C-181/23, that Malta's investor citizenship scheme infringed EU law because a Member State cannot grant nationality, and with it Union citizenship, in exchange for predetermined payments or investments (Court of Justice of the European Union,

Press Release No 52/25). Regulation (EU) 2025/2441, dated November 26, 2025, amended the visa suspension rules; EUR-Lex records entry into force on December 30, 2025 (EUR-Lex, Regulation (EU) 2025/2441). The Commission's eighth report, adopted December 19, 2025, then called the Eastern Caribbean schemes a persistent and serious security concern and a potential ground for suspending visa-free travel under the revised mechanism (European Commission, Eighth Report under the Visa Suspension Mechanism, COM(2025) 792).

The same report credits the five with some reform, including a harmonized minimum investment threshold of USD 200,000 and tighter security screening, yet says the situation still raises significant concern (European Commission, COM(2025) 792). It also frames the matter in legal terms: under the revised mechanism, operating such a program is in itself a ground for suspending a country's visa-free status. That sentence is what turns an advisory worry into a trade-off for each government.

The report itself names no phase-out date. A date came later, from one of the governments concerned: Antigua and Barbuda's Office of the Prime Minister stated on July 6, 2026 that a Commission letter dated June 25, 2026 asked for the program to be phased out by June 1, 2028, and that the other four Eastern Caribbean governments had received similar correspondence (Government of Antigua and Barbuda, Office of the Prime Minister, July 6, 2026). The letter itself hasn't been published, so this e-book grades that item as reported by the government concerned and returns to it in Chapters 9 and 10.

None of this makes the question of access moot for families. It changes how long the window might stay open and how closely the units vet applicants while it does.

Where rules diverge before anyone applies

Two units show how unevenly access is drawn. St Kitts and Nevis states that applications from citizens of Afghanistan, Belarus, Iran, Iraq, North Korea and Russia are not accepted, and the 2023 order extends the exclusion to persons ordinarily resident in those countries (St Kitts and Nevis CIU, Eligibility Criteria; SRO No. 27 of 2023). Dominica lists Belarus, Russia and nationals of Northern Iraq as banned, records a suspension of Yemeni applications, and attaches three conditions to Iran, North Korea and Sudan: no residence there for at least ten years, no substantial assets there and no business performed there. It adds that enhanced due diligence may apply (Dominica CBIU, Banned Nationalities). Same word "restricted", very different mechanics. Chapter 3 takes up those lists in full.

Tisoro, which describes itself as the world's first AI-powered investment migration advisory, is the publisher of, and a participant in, the industry examined in this report. Its public nationality pages record how many of the 8 citizenship programs are listed as open for each passport, from 3 of 8 on the pages for [Russians](#) and [stateless individuals](#) up to 8 of 8 for several other passports (Tisoro, Citizenship by Nationality). Those counts are Tisoro's own classification of access, stated case by case, and they sit beside the issuing bodies' rules; they don't replace them. Chapter 2 sets out how they're built.

What a reader can take from the field

Three practical readings follow. First, **the absence of a published nationality figure isn't evidence of low or high demand**; it's an absence. Second, program rules vary by unit and by year, so any statement about a passport needs a date and a named issuer. Third, a family's real position usually turns on documents rather than on headline eligibility: where funds came from, what the home country's law says about a second nationality, and what the travel record shows. Those are the later screens, and they're where most of this e-book's evidence sits.

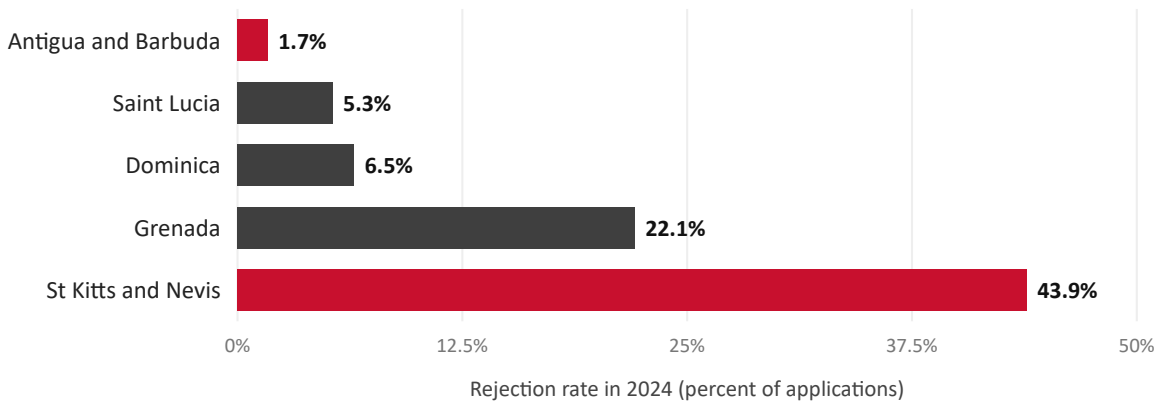
Eight programs promise a second citizenship, but the rules that decide a given family are spread across units, ministries, EU institutions and the home country's own statute books.

Market Size and Economics: Applications, Rejections and What the Published Data Can and Cannot Size

The five Eastern Caribbean programs reported 13,113 applications in 2023 and 10,573 in 2024, and the Commission's own table shows 22.1 percent of Grenada's and 43.9 percent of St Kitts and Nevis's 2024 applications rejected, even as the accompanying text calls rejection rates low (European Commission, Staff Working Document SWD(2025) 429, Eastern Caribbean section). That mismatch captures the state of market sizing here: the numbers exist, they're official, and they still don't line up. *Nobody can yet say how big this market is, only how big each unit says its own slice was.*

Counting applications, and what the count means

The Commission's table comes from data the five countries submitted, and it carries its own warning: applications may cover several family members, so counts of applications and counts of passports differ (SWD(2025) 429). Application volumes also moved sharply from one year to the next. Antigua and Barbuda rose from 685 applications in 2023 to 1,733 in 2024, while St Kitts and Nevis fell from 1,987 to 223 and Grenada from 2,297 to 420. Dominica and Saint Lucia stayed broadly level (SWD(2025) 429).



Country-submitted data that the Commission describes as partial; applications may cover several family members. The rejection rate for the five programs combined is not published, so it is left out.

Figure 1. Applications received and 2024 rejection rates, five Eastern Caribbean programs

Source: European Commission, Staff Working Document SWD(2025) 429 (2024 data and rejection rates); European Commission, COM(2024) 571 (2023 data for Saint Lucia). Published December 19, 2025 and December 6, 2024.

Cut-off dates matter more than they look. Saint Lucia's own annual report, for the year ended March 31, 2025, records 2,957 applications received (Saint Lucia CIU, Annual Report 2024-25), while the Commission's calendar 2024 figure for the same unit is 4,304. Neither number is wrong; they cover different twelve months. Read across programs, the series are indicative rather than additive.

Passports: the count that doesn't reconcile

The Commission states that an estimated 107,625 passports have been issued across the five schemes, with no period attached (SWD(2025) 429); the main report rounds it to around 107,000 (European Commission, Eighth Report under the Visa Suspension Mechanism, COM(2025) 792). The table's own passport entries don't reproduce that estimate. By this e-book's arithmetic they sum to 137,325 once the partial 2025 columns are included, with Saint Lucia printed as not available and Dominica missing a year, and the Commission doesn't explain the difference. The seventh report's passport figures differ from the eighth's for the same countries too, and its footnote concedes that the data set is incomplete and contains inconsistencies (European Commission, COM(2024) 571, footnote 33). So the 107,000 figure should be read as the Commission's order of magnitude, not as a tally.

Rejection rates, read carefully

For 2024 the table gives rejection rates of 1.7 percent for Antigua and Barbuda, 5.3 percent for Saint Lucia, 6.5 percent for Dominica, 22.1 percent for Grenada and 43.9 percent for St Kitts and Nevis (SWD(2025) 429). Each reproduces as rejections divided by applications received in the same calendar year, by this e-book's arithmetic; because decisions in a year often relate to earlier applications, the ratio isn't a clean refusal rate. The Commission's text quotes only the first three as examples and says low rejection rates, together with short statutory processing times, raise concerns about the adequacy of security and due diligence (COM(2025) 792). Two of the five rates sit far above that picture. No 2023 rate is printed in either report.

For a family weighing a second citizenship, the spread carries a practical meaning. A low unit-level rate doesn't say a given file is safe, and a high one doesn't say a given file is weak; the rates describe how units behaved in a year, and units differ in pre-screening, agent practice and how rejections get recorded.

What it costs governments to say yes, and what they earn

Entry prices are the easiest figures to find. The five Eastern Caribbean programs harmonized a minimum investment of USD 200,000 in 2024, which the Commission describes as a doubling from USD 100,000 for four of them (European Commission, COM(2024) 571, p. 45; SWD(2025) 429). St Kitts and Nevis lists a minimum Sustainable Island State Contribution of USD 250,000 plus a USD 10,000 due diligence fee (St Kitts and Nevis CIU, Sustainable Island State Contribution). Türkiye's official guide sets USD 400,000 for real estate and USD 500,000 for deposits, bonds, fund shares or fixed capital investment (Presidency Investment Office of Türkiye, Acquiring Property and Citizenship). São Tomé and Príncipe states USD 90,000 for an individual (STP-Press, August 12, 2025), and Vanuatu lists government fees from USD 130,000 for a single applicant (Vanuatu Citizenship Office, Fees and Charges). Those are government-side prices; what intermediaries charge on top is set by each firm and isn't published by any unit.

Revenue is where the Eastern Caribbean programs diverge most. The International Monetary Fund's 2026 Article IV reports give a fiscal view that the units' own pages mostly don't. Dominica's CBI revenue was estimated at EC\$670.5 million for fiscal 2024/25, or 34.7 percent of GDP, and is projected to fall to EC\$444.6 million, or 20.3 percent, in 2026/27 (International Monetary Fund, Dominica 2026 Article IV, CR 26/117). Grenada's government CBI revenue was EC\$553.7 million in 2024, 14.7 percent of GDP, and an estimated EC\$175.6 million, 4.4 percent, in 2025 (International Monetary Fund, Grenada Article IV, CR 26/9). St Kitts and Nevis fell from 22.2 percent of GDP in 2023 to 8.6 percent in 2024 and an estimated 5.3 percent in 2025 (International Monetary Fund, St Kitts and Nevis 2026 Article IV, CR 26/93). Antigua and Barbuda's share is smaller, at 1.1 percent in 2023 and 1.3 percent in 2024, rising to an estimated 2.6 percent in 2025 (International Monetary Fund, Antigua and Barbuda 2026 Article IV, CR 26/97).

	2023	2024	2025 (estimate)
Antigua and Barbuda	1.1%	1.3%	2.6%
Dominica (fiscal year)	36.6%	33.1%	34.7%
Grenada	12.7%	14.7%	4.4%
St Kitts and Nevis	22.2%	8.6%	5.3%

CBI revenue as percent of GDP; darker cells mean a higher share

Source: IMF Article IV series. Dominica is shown on a July to June fiscal year as labeled by the IMF: 2022/23, 2023/24 and 2024/25. 2025 values are IMF estimates.

CBI revenue as a share of GDP, IMF Article IV series (percent)

Source: IMF Country Reports CR 26/97 (Antigua and Barbuda), CR 26/117 (Dominica), CR 26/9 (Grenada), CR 26/93 (St Kitts and Nevis), 2026. Saint Lucia is omitted because its IMF series is not comparable with the unit's reported revenue.

Unit-level documents add detail but use other bases. Saint Lucia's unit reported revenue of EC\$402.2 million for fiscal 2024/25, a 67 percent increase that counts the unit's own fee income rather than all investor money, and it distributed EC\$86,150,190 to the Consolidated Fund (Saint Lucia CIU, Annual Report 2024-25). The report doesn't state a share of GDP. Grenada's agency reports central government revenues of EC\$152,999,122 net of associated expenditure for 2025, a figure on a different basis from the IMF's estimate and not interchangeable with it (Investment Migration Agency Grenada, Q4 2025 Statistics Report). Antigua and Barbuda's unit reported contributions of \$62,975,000, as printed, under its national development fund option alone for January to June 2024, with the report giving no money split for other options (Antigua and Barbuda CIU, Six-Monthly Report, January 1 to June 30, 2024). The sources even disagree with each other: Grenada's finance ministry records 2023 actual receipts of EC\$381.6 million, while the IMF gives EC\$457.3 million (Government of Grenada, Estimates of Revenue and Expenditure 2025-2027; IMF, CR 26/9).

Dominica's own budget address adds a sense of dependence: it describes CBI as accounting for roughly 58 percent of total revenues in the 2024/25 outturn (Government of Dominica, Budget Address 2025/2026). Taken with the IMF series, the picture is of programs whose fiscal weight is large in some jurisdictions and modest in others, and that weight is moving quickly. That's an interpretation, but a reasonable one: a government that draws a third of GDP from the program faces a different trade-off from one drawing about one percent when the European Union asks for a phase-out.

What the published data can't size

Three gaps run through all of it. There is no official count of how many countries sell citizenship worldwide; the FATF and OECD report states none, and the OECD cites over 100 citizenship and residence by investment schemes combined, which isn't a count of countries (OECD/FATF, Misuse of Citizenship and Residency by Investment Programmes, 2023, para. 117). There is no official revenue by passport anywhere. And Türkiye, the program with the largest reported volume, publishes no regular series: Turkish media reported on August 9, 2026 that the Interior Minister said, in an interview on May 29, 2026, that 174,567 people, investors and family members, had gained citizenship through investment since 2018, with USD 16.074 billion invested (T24, reporting DW Türkçe). This e-book grades that as reported, not confirmed, and it carries no breakdown by route, year or nationality.

Market size in this field is a set of partial, differently dated ledgers, and the honest summary is a range of confidence rather than a total.

The Demand Data Gap

ACCESS GAP



What issuers publish on demand by passport

Chapter 1: Citizenship by Investment by Nationality — The Access Gap: What Issuing Bodies Publish on Demand by Passport

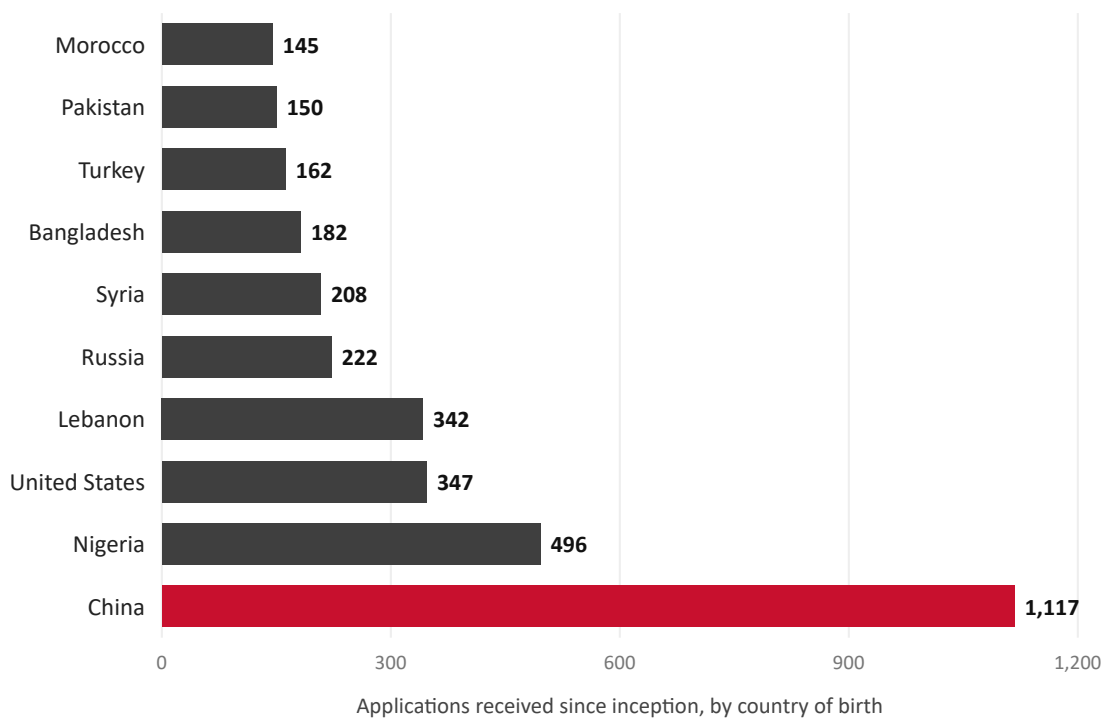
No issuing body publishes a full demand table by passport, and the three partial views that do exist cover different things, different years and different units of count. Antigua and Barbuda reports applications by country of birth to June 30, 2024. Grenada reports rounded percentage shares of applications received. The European Commission reproduces country-supplied lists of successful applicants. Read together, they show who has been appearing in these programs; read alone, none of them says how many people from a given passport applied, qualified or were refused.

A. What the access gap is

A family's first question is practical: is a given passport processed here, and does it get through? The access gap is the distance between that question and what's published. It's wide for a structural reason, since citizenship units answer to their governments and to the European Union, not to a public that wants a passport-level ledger. *What reaches the public is what a regulator, a budget or a treaty partner asked for, not what a family would ask.*

B. The data

Antigua and Barbuda's six-monthly report is the most granular. Appendix I counts applications received by country of birth: 739 in January to June 2024 and 5,203 since inception. China leads both, with 90 applications (12.18 percent) in the half-year and 1,117 (21.47 percent) since inception, followed since inception by Nigeria with 496, the United States with 347 and Lebanon with 342 (Antigua and Barbuda CIU, Six-Monthly Report, January 1 to June 30, 2024). By this e-book's arithmetic the ten leading birth countries account for about 65 percent of all applications. Birth country isn't nationality, and applications aren't people, so the table says where applicants were born, not what passports they held.

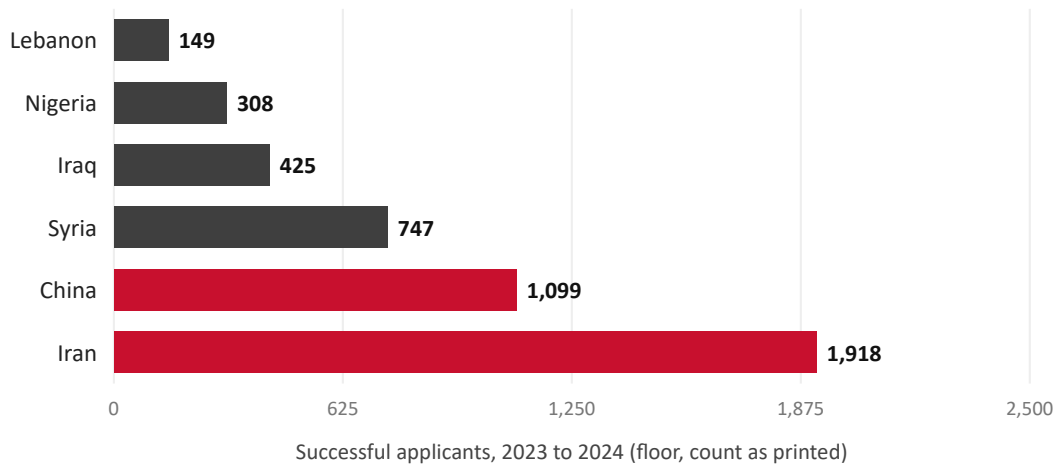


Applications received, not people or approvals, by country of birth rather than nationality. Ten leading countries, inception to June 30, 2024.

Figure 2. Antigua and Barbuda applications by country of birth, ten leading countries, inception to June 30, 2024

Source: Antigua and Barbuda Citizenship by Investment Unit, Six-Monthly Report, January 1 to June 30, 2024, Appendix I.

The Commission's list is the only multi-program view by nationality. Its seventh report says the main successful applicants in 2023 and 2024 included Iran (1,918), China (1,099), Syria (747), Iraq (425), Nigeria (308) and Lebanon (149), among others (European Commission, Seventh Report under the Visa Suspension Mechanism, COM(2024) 571, p. 44). The footnote carries the caveats that matter: the figures rest on each country's top five nationalities by successful applications, so true totals may be slightly higher, and all Iranian applications in the figures were processed only by Dominica. The report doesn't say which countries supplied each line or whether the count is persons, passports or applications. Treat the series as a floor with an unknown unit.

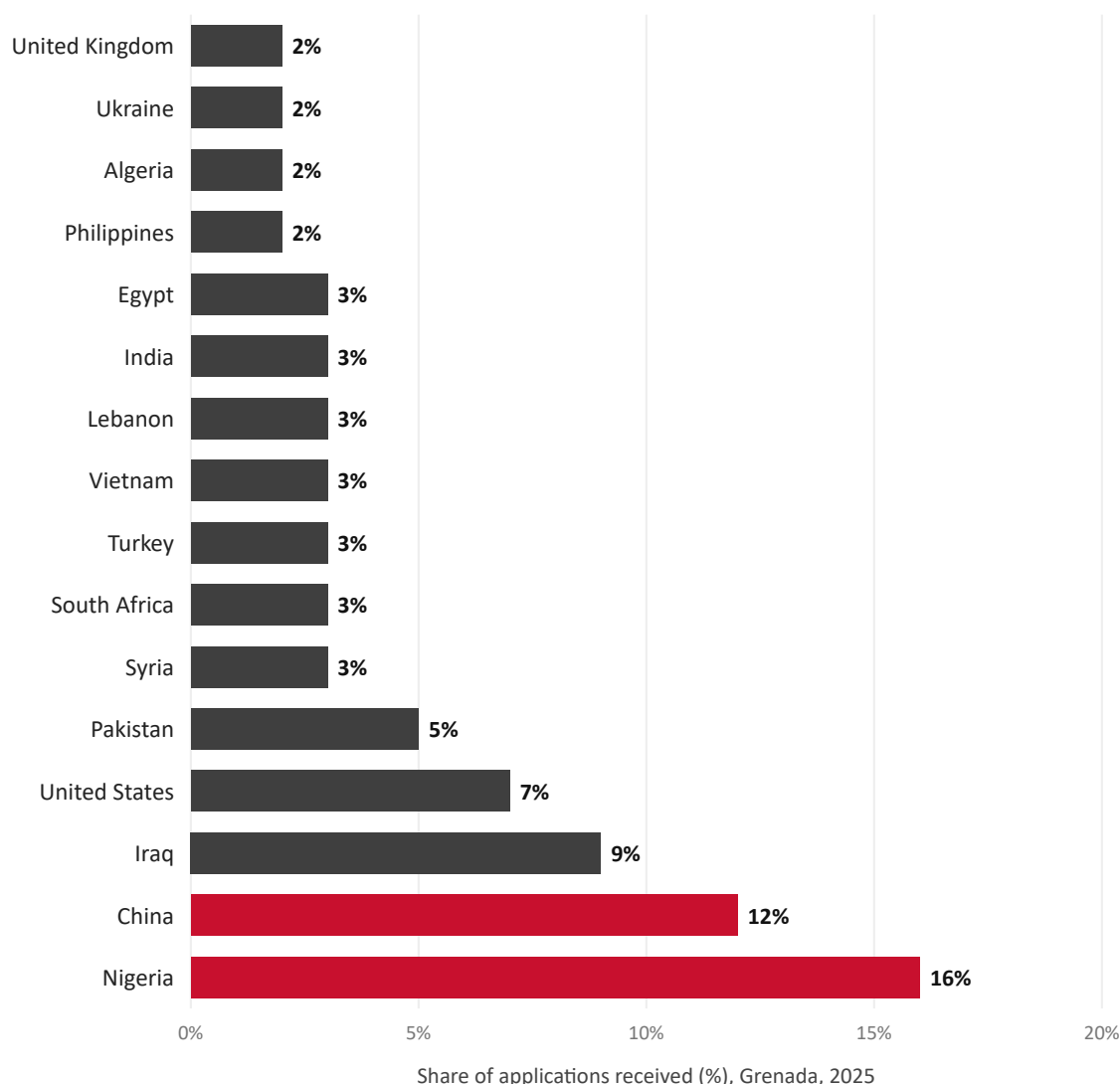


Country-supplied data on each country's top five nationalities, so actual figures may be slightly higher. All Iranian applications reported were processed only by Dominica. The report does not define the unit counted and describes the data set as incomplete and inconsistent.

Figure 3. Main successful applicants by nationality, Eastern Caribbean programs, 2023 to 2024 (floor)

Source: European Commission, Seventh Report under the Visa Suspension Mechanism, COM(2024) 571, p. 44 and footnotes 33 and 34 (Council document ST 16326/2024), December 6, 2024.

Grenada gives shares, not counts. For calendar 2025 its agency reports Nigeria at 16 percent of applications received, China at 12, Iraq at 9 and the United States at 7, out of 469 applications, with one application possibly covering several people (Investment Migration Agency Grenada, Q4 2025 Statistics Report). Rounded shares sum to 101 percent, and every country not listed is at 1 percent or less.



Rounded shares of 469 applications received; one application may include several people. Not shown for space: Myanmar and Uzbekistan (2 percent each) and Other (19 percent). Published shares sum to 101 percent because of rounding; each country not listed is at 1 percent or less. No counts by nationality are published.

Figure 4. Grenada applications received by nationality, calendar 2025 (percentage shares)

Source: Investment Migration Agency Grenada, Q4 2025 Statistics Report, geographic distribution of applications, year to date.

C. Structure and players

Four kinds of publisher sit behind these figures. Two units, in Antigua and Barbuda and Grenada, publish their own data. The Commission publishes what the Eastern Caribbean governments send it, and for Vanuatu what that government sent in January 2022. Saint Lucia's latest annual report gives totals but no country breakdown, and no official nationality data were found for Dominica, St Kitts and Nevis, Türkiye or São Tomé and Príncipe (Saint Lucia CIU, Annual Report 2024-25). Vanuatu's 2015 to 2021 submission lists China (6,628), Nigeria (430), Libya (292), Iraq (276), Syria (276) and Russia (247) among its main successful nationalities, though the Commission reports numerous inconsistencies in the data and notes that the listed nationalities sum to far fewer than the 13,489 citizenships awarded (European Commission, Report on Vanuatu, COM(2024) 366, Table 1).

One structural fact sits behind every nationality line. The Commission records that all five Eastern Caribbean governments apply a restricted-countries policy, with lists that differ by program, and Iran appears on four of the five lists as printed, with Dominica attaching conditions instead (European Commission, SWD(2025) 429). That fits the footnote saying Iranian applications were processed only by Dominica. A nationality line in a published table tells a reader that applications were handled under that unit's rules, nothing wider.

D. Notable movement this cycle

Three developments changed the picture in the past year. The Commission's December 2025 working document reported that in 2024, among four countries that supplied nationality data, successful applicants included 531 Syrians, 365 Iraqis and 333 Chinese, and that Grenada's partial data showed China (96) and Nigeria (82) leading (European Commission, SWD(2025) 429). Those figures cover a different year and country set from the earlier list, and the Commission doesn't reconcile them. Grenada's first-quarter 2026 report, on 103 applications, shows Nigeria at 24 percent, China at 15, the United States at 9 and Iraq at 7; on a base that small, quarter-to-quarter swings say little (Investment Migration Agency Grenada, Q1 2026 Statistics Report). And Vanuatu nationals have needed an EU visa since February 3, 2025, after Regulation (EU) 2025/11 moved the country to the visa-required list (EUR-Lex, Regulation (EU) 2025/11; Council of the EU, press release of December 12, 2024). Antigua and Barbuda's newest published nationality table still ends in June 2024.

A smaller note belongs here too. The Commission wrote that in 2023 Grenada held around 2,300 pending applications from Russian nationals, processed in 2024, with 87 still outstanding on September 16, 2024 (European Commission, COM(2024) 571, p. 45). The report says processed, not approved, and Grenada's restricted-countries list includes Russia.

E. Reader implications

The three series are different instruments, and the choice of which to lean on follows what a reader needs. Birth-country counts from a unit suit questions about applicant mix over time. Shares suit a quick read of where applications come from, provided the base year is stated. The Commission's list suits only the question of whether a passport has appeared at all, since it's a floor on an unknown unit. None settles whether a given passport is accepted, and a passport's absence from a table is an absence of data, not of access.

The same caution applies to Tisoro's passport-level counts in Chapter 2: they record how many of the 8 programs are listed as open, which is a measure of access, not demand, and shouldn't be read against these tables. Iran, Syria and Iraq lead the Commission's list, and those same cohorts face the heaviest screening, which Chapter 3 treats on its own terms. China, Nigeria and Lebanon recur among the leading lines in several series, though the unit-level mechanics behind each line differ.

The gap between what is published and what a family needs is itself a finding, and the next chapter turns from demand to access.

Screen One

PROGRAM ACCESS

How many of the 8 programs are open by passport

Chapter 2: Citizenship by Investment by Nationality — Screen One, Program Access: How Many of the 8 Citizenship Programs Are Open by Passport

Between 3 and 8 of the 8 citizenship programs are listed as open, depending on the passport, and the published unit rules explain some of that spread but not all of it. Screen one asks the bluntest question in the sequence: before price, funds or family, does a program take applications from this passport at all? The answer sits in three places that rarely agree in format, namely unit exclusion lists, route-level rules and each unit's discretion.

A. What the screen measures

Program access counts how many of the 8 programs a given passport can approach, not how many it will win. Tisoro's public nationality pages record that count for 14 passports and for two status groups, and each page states that an assessment is made case by case (Tisoro, Citizenship by Nationality). The same pages count residence programs out of 13, which the table below shows alongside, as a contrast: citizenship access narrows far more than residence access does.

B. The data

The counts run from 3 of 8 for [Russian](#) and stateless applicants, through 5 for Iranian, 7 for Syrian, Nigerian, Iraqi, Turkish and revoked-citizenship applicants, up to 8 for Lebanese, American, British, Indian, Vietnamese, Pakistani and Egyptian applicants. The Chinese page ranks all 8 options and states no open count, so none is given here. These are Tisoro's own classifications as compiled for this e-book in October 2026, not government statistics (Tisoro, Citizenship by Nationality).

	Citizenship programs open	Residence programs open
Chinese	n/p	13
Iranians	5	12
Russians	3	7
Americans	8	12
Syrians	7	12
Nigerians	7	13
Lebanese	8	13
Iraqis	7	13
Turks	7	13
British	8	13
Vietnamese	8	13
Egyptians	8	13
Revoked citizenship	7	n/p
Stateless individuals	3	n/p

Number of programs listed as open; darker means more programs open

Blank cells are not stated: Chinese citizenship (all 8 ranked) and residence for Revoked citizenship and Stateless individuals. Pakistanis and Indians are not shown; both list 8 and 13, the same as Lebanese. These are Tisoro's own classifications as compiled in October 2026, assessed case by case, not government statistics or approvals.

Figure 5. Citizenship and residence programs listed as open, by passport or status

Source: Tisoro, *Citizenship by Nationality and Residence by Nationality* pages (www.tisoroglobal.com), compiled October 2026; read against unit eligibility rules cited in the text.

C. Structure and players

Published rules fall into four types. The first is an outright exclusion. St Kitts and Nevis excludes citizens of, and persons ordinarily resident in, Afghanistan, Belarus, Iran, Iraq, North Korea and Russia by statutory order (St Kitts and Nevis, SRO No. 27 of 2023). Grenada's agency stated on December 15, 2023 that applications from Russia and Belarus had not been accepted since March 31, 2023 and that its bans on North Korea and Iran remained in full effect (Investment Migration Agency Grenada, press release, December 15, 2023). Saint Lucia suspended processing for Russian and Belarusian nationals by memorandum on March 18, 2022 (Saint Lucia CIU, memorandum of March 18, 2022).

The second type is conditional eligibility. Antigua and Barbuda's Cabinet list of February 26, 2020 names Afghanistan, Iran, North Korea, Somalia, Yemen and Sudan, yet lets nationals apply if they migrated before majority or have lived at least ten years in an unlisted country with no economic ties to a listed one (Antigua and Barbuda CIU, FAQ). Dominica applies three conditions to Iran, North Korea and Sudan (Dominica CBIU, Banned Nationalities).

Vanuatu's Development Support Program regulations let the commission accept applicants from a restricted country after five years' residence elsewhere and proof of permanent residence abroad, though no list is attached to the clause (Vanuatu, Citizenship (Development Support Program) Regulations Order No. 33 of 2019, cl. 6(8)).

The third is route-level. Türkiye's Interior Ministry population directorate states that Syrian nationals cannot apply through the real estate route because of Law 1062, and the list of countries whose nationals may buy property is set by the executive (Türkiye, General Directorate of Population and Citizenship Affairs, FAQ; Presidency Investment Office of Türkiye, Acquiring Property and Citizenship). The fourth is a mandate with no list yet. São Tomé and Príncipe's decree lets the government declare candidates from sanctioned or non-cooperating countries inadmissible, as Lusa summarized it, and no list was found (Observador, August 15, 2025).

D. Notable movement this cycle

Saint Lucia's amending Act No. 22 of 2025 made denial mandatory for convictions, security risk and unresolved visa denials, and discretionary where another OECS state has denied the applicant, in force from November 10, 2025 (Saint Lucia, Citizenship by Investment (Amendment) Act No. 22 of 2025). Grenada's circulars on restricted nationalities no longer appear on its current site, so the December 2023 release is the last official statement found. Vanuatu's portal gives no statement on current intake. One more gap: the Commission lists Russia as restricted in Antigua and Barbuda, but the unit's own FAQ list doesn't name it (European Commission, SWD(2025) 429; Antigua and Barbuda CIU, FAQ).

E. Reader implications

Read against those rules, three counts trace cleanly. Russian applicants are listed in the Commission's restricted lists for all five Eastern Caribbean programs, which leaves three programs outside them, matching the 3 of 8 (European Commission, SWD(2025) 429). The [Iranian](#) count of 5 fits too: three programs exclude Iran outright (St Kitts and Nevis, Grenada and, on the Commission's list, Saint Lucia), two apply conditions and three publish no Iran exclusion. For [Iraqi](#) applicants, one program excludes the nationality and Dominica excludes the northern region, consistent with 7 of 8.

Others don't trace. No published list identifies which program is closed to [Nigerian](#) or [Syrian](#) applicants, and for stateless and [revoked-citizenship](#) applicants, the only official provisions found are Vanuatu's bar on people whose Vanuatu citizenship was revoked and São Tomé's document list, taken up in Chapter 7. For [Turkish](#) applicants, the Türkiye program itself is presumably out of scope, since Turkish nationals already hold that citizenship; that's an inference, not a published rule. The selection logic follows: use a count as a starting list, confirm each program against the unit's current text, and treat a listed restriction as a screen the case is still assessed under, not a verdict.

Access is a count with a paper trail, and where the trail ends, the count is only as good as the case-by-case assessment behind it.

Screen Two

SANCTIONS

Sanctions and due diligence before eligibility

Chapter 3: Citizenship by Investment by Nationality — Screen Two, Sanctions and Due Diligence: Compliance Before Eligibility

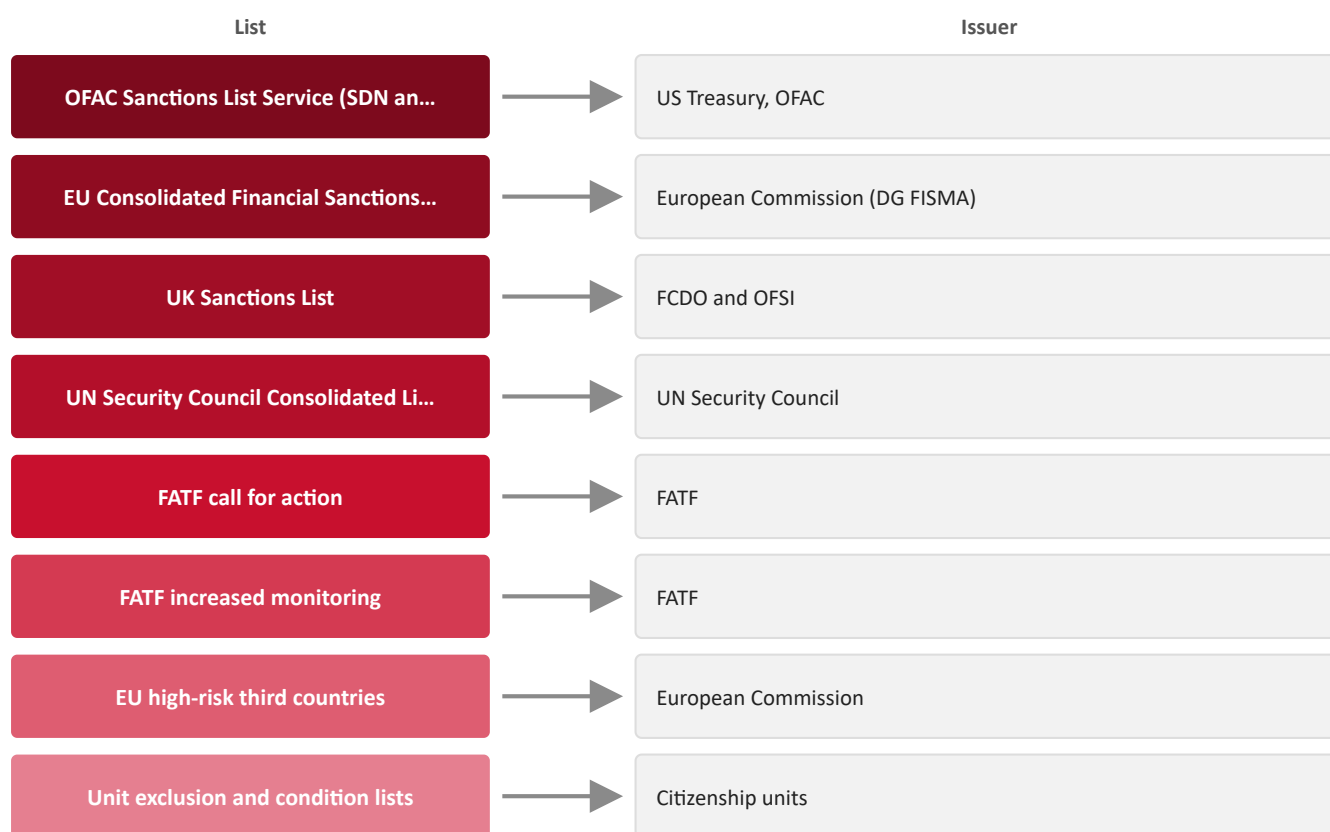
A passport on a restricted list is a rule, but a sanctions hit is a legal bar, and the October 1, 2026 OFAC designations show why screening has to follow every nationality of record, not just the one on the application. That action named two individuals whose entries read nationality Iran, alt. nationality Dominica, and OFAC does not say how the second nationality was acquired (US Treasury, OFAC, Recent Actions, October 1, 2026). No program is implicated by that detail. What it shows is the mechanics: lists search names and every recorded nationality, and an issuing unit that screens only the passport it was shown has screened half a file.

A. What the screen is

Screen two stacks four different things that are easy to blur. Unit nationality rules, covered in Chapter 2, decide whether a passport is accepted for processing. Sanctions lists decide whether a named person may be dealt with at all. Jurisdiction lists from the FATF and the EU mark countries whose financial systems carry elevated risk; they aren't designations of any individual. And the unit's own due diligence decides whether this applicant, with this money and this history, gets through. *The first three narrow the field; the fourth is where files are actually won or lost.*

B. The data

The figure sets out the lists in use, who issues each and how they differ in reach. Two differences matter most for dual nationals. OFAC's data file holds nationality and citizenship as separate repeatable features, while the UN defines its single nationality field as previous or current nationality or citizenship (OFAC, Sanctions List Service; UN Security Council, Consolidated List). And ownership tests differ: OFAC treats an entity owned 50 percent or more in the aggregate by blocked persons as itself blocked, while the UK prohibits dealings with unlisted entities that are owned or controlled by a designated person (OFAC, Revised Guidance of August 13, 2014; UK Sanctions List search tool user guide).



Status as of October 26, 2026 unless stated. OFAC, EU, UK and UN lists are person-based; FATF and EU high-risk lists flag country-level risk; unit lists decide which passports are processed.

Figure 6. Sanctions and risk lists applied at screening, by issuer and coverage

Source: OFAC Sanctions List Service; European Commission (Finance); GOV.UK, The UK Sanctions List; UN Security Council Consolidated List; FATF statements of June 19, 2026; European Commission, AML/CFT at international level; unit pages as cited in the text.

Jurisdiction lists move on a calendar. The FATF's lists dated June 19, 2026 name Iran, North Korea and Myanmar for a call for action, and 22 jurisdictions under increased monitoring, among them Iraq, Lebanon, Syria and Vietnam; Russia's FATF membership has been suspended since February 24, 2023 and it sits on neither list (FATF, June 19, 2026 statements; FATF, Statement on the Russian Federation). The October 2026 plenary was under way at this e-book's cut-off, so those lists may change. The EU's high-risk third-country table, updated January 9, 2026, carries 26 entries including Iran, Russia, Syria, Lebanon, Vietnam and Vanuatu, and no longer lists Nigeria (European Commission, AML/CFT at international level). Appearing on such a list is not a sanctions designation of a person, and the FATF itself says increased monitoring doesn't call for enhanced due diligence on its own.

C. Structure and players

Sanctions screening in a program runs through several hands. Units describe external checks. Dominica requires an interview for applicants aged 16 and over, uses a third-party due diligence agency, and applies enhanced due diligence to all Iranian applicants, with enhanced fees of US\$25,000 for a main applicant against the standard US\$7,500 (Dominica CBIU, Enhanced Due Diligence). Its June 2026 press release describes WorldCheck screening by agents, independent on-the-ground checks, cross-referencing by the regional security agency against watchlists and Interpol, and an average processing time of about three months (Dominica CBIU, due diligence press release, June 18, 2026). St Kitts and Nevis lists a US\$10,000 due diligence fee for a main applicant and gives processing times of 3 to 6 months on one page and 160 to 180 days on an older one (St Kitts and Nevis CIU, Application Process; St Kitts and Nevis CIU, FAQs, September 10, 2024). Antigua and Barbuda calls its checks rigorous and charges US\$8,500 for a principal applicant but publishes no description of who performs them (Antigua and Barbuda CIU, Schedule of Fees).

The international benchmark is the 2023 FATF and OECD report. It recommends that each layer, namely agent, unit and any fund recipient, screen independently without relying on the others, verify birthplace and all citizenships, search adverse media in the applicant's languages, and re-check approved names against Interpol and sanctions lists each year (OECD/FATF, Misuse of Citizenship and Residency by Investment Programmes, 2023, paras. 139 and 156). Tisoro states that its [V.E.R.A.](#) engine screens each applicant across OFAC, EU, UK, UN and FATF frameworks before any submission, and that its published scenarios on [nationality restrictions](#) treat restricted nationalities case by case (Tisoro, AI Systems).

Disclosure carries legal weight on the unit side too. Antigua and Barbuda lists false information and a potential security risk to Antigua and Barbuda or to any other country among its grounds of ineligibility (Antigua and Barbuda CIU, Citizenship page), and Saint Lucia's amended Act obliges the board to deny an application that supplies false information or presents a security risk (Saint Lucia, Citizenship by Investment (Amendment) Act No. 22 of 2025). A nationality left off a form is therefore not a paperwork slip; it's the kind of omission that can turn a clean file into a refusal, or later a revocation, a risk Chapter 8 follows after the grant. The OECD and FATF report asks units to verify all nationalities and identities and to assess source of wealth as well as source of funds, which is why the same file is read twice, once for who the person is and once for where the money came from (OECD/FATF, 2023, paras. 141 and 148).

D. Notable movement this cycle

Two official moves frame the year. On February 24, 2026 FinCEN rescinded its 2014 advisory on abuse of the St Kitts and Nevis program, an advisory that had said several OFAC-designated Iranian nationals appeared to have obtained passports through it (FinCEN, Advisory FIN-2014-A004, rescinded February 24, 2026). FinCEN posted no reason on the page. And the Commission's December 2025 report called investor citizenship in the Eastern Caribbean a serious security concern, framing it as a vetting concern rather than naming sanctions evasion (European Commission, COM(2025) 792). Regional governments, for their part, report implementing most of six principles agreed with the US Treasury in 2023, with audits and retrieval of revoked passports still in progress as of August 2024 (Eastern Caribbean Central Bank and OECS, August 29, 2024 roundtable release).

E. Reader implications

For the four cohorts that most often meet this screen, the evidence points in different directions. [Iranian](#) applicants meet the densest stack: a FATF call-for-action listing for the jurisdiction, unit exclusions or conditions, and enhanced due diligence at Dominica. For Russian applicants the barrier is mostly unit policy, since Russia is on no FATF list. Syria and Iraq sit under increased monitoring, which signals elevated country risk that units may weigh but isn't itself a bar. None of this says an individual from any of these countries is sanctioned or cleared; that turns on the person's own record.

The selection logic is therefore about disclosure and consistency. Every nationality held, current or past, belongs on the file, and names should be checked in all spellings, since fuzzy matching applies only to name fields in OFAC's search tool (OFAC, FAQ 246). A reader should expect a longer, costlier and more document-heavy review where enhanced due diligence applies, and should treat any program that promises certainty with suspicion.

The question a screener asks first is not which passport is on the form but which other documents, names and nationalities sit behind it.

“The passport on the form is where a screen begins, not where it ends.”

— The author, Editor-in-Chief & News Director, Tisoro Intelligence

Screen Three

HOME-COUNTRY LAW

Dual citizenship, permission and notification rules

Chapter 4: Citizenship by Investment by Nationality — Screen Three, Home-Country Law: Dual Citizenship, Permission and Notification Rules

A second passport changes the first only where home-country law says so, and the trigger differs by jurisdiction: **voluntary acquisition in China and India, failure to renounce in Pakistan, missing permission in Egypt and Syria, and a missed 60-day notice in Russia.** Screen three is the one most often discovered late, because it sits outside the issuing unit's paperwork and inside the applicant's own statute book. Of the texts read for this e-book, none singles out citizenship by investment; each treats it as any other voluntary acquisition of foreign nationality.

A. What the screen is

The question is narrow and legal: what happens to the first nationality when a second one is acquired? Four patterns recur. Some states end the first nationality automatically. Some require prior permission. One adds a duty to notify after the fact. Others tolerate the second nationality or record it. *The rule that matters is the one written in the home statute, not the one believed in the family.*

B. The data

The figure sets out each jurisdiction, the pattern and the provision. The headline split is plain enough. Automatic loss or prohibition applies in China, India, Pakistan outside an exempt list and Nigeria for citizens not by birth. Permission governs Egypt and Syria, and applies in qualified forms in Lebanon, Iran and Vietnam. Russia asks for notice. Türkiye, Iraq, the United States and the United Kingdom tolerate a second nationality.

	Rule on acquiring	Note
China	Automatic loss abroad	'Settled' undefined
India	Automatic termination	OCI is not citizenship
Vietnam	Retention needs permission	Effective July 1, 2025
Iran	Void if outside law	2025 amendment not retrieved
Russia	Tolerated; 60-day notice	MFA 2028 draft not law
Türkiye	Tolerated and recorded	No loss on acquiring
Pakistan	Loss unless renounced	Gazette notification not found
Nigeria	Forfeiture unless by birth	Bill HB. 2059 pending
Egypt	Prior minister permission	Unofficial translation read
Lebanon	Loss only by decree	University portal copy
Iraq	Multiple citizenships allowed	Ministry of Justice translation
Syria	Loss only by decree	UNHCR translation
United States	Tolerated	No permission or notice
United Kingdom	Dual citizenship allowed	No consular help

■ Tolerated or allowed
 ■ Conditional, partial, or source to re-check
 ■ Loss, permission, or voiding rule
■ Neutral reference

Labels are shortened from the figure's own wording. Entries based on unofficial or secondary texts should be re-checked against the current official text.

Figure 7. Home-country rules on acquiring a second citizenship, by jurisdiction

Source: National Immigration Administration (China); India Code and Indian missions; Law on Vietnamese Nationality (2025 consolidated text); Federal Law 138-FZ (Russia); Law 5901 (Türkiye); Pakistan Code and DGI&P; Nigerian Constitution; Law 26 of 1975 (Egypt, UNHCR translation); Decree 15 of 1925 (Lebanon); Iraq Ministry of Justice; Legislative Decree 276 of 1969 (Syria, UNHCR translation); US State Department; GOV.UK.

C. Structure and players

Start with the strictest regimes. China's Nationality Law states that China does not recognize dual nationality for any Chinese national (Art. 3), and that a citizen who has settled abroad and voluntarily acquires foreign nationality automatically loses Chinese nationality (Art. 9), with no application needed (National Immigration Administration, Nationality Law of the PRC, Arts. 3, 9 and 14). The statute doesn't define settling abroad. For [Chinese](#) families that gap matters more than the headline rule. India's Citizenship Act, section 9, ends Indian citizenship on voluntary acquisition of another country's citizenship, and Indian missions say holding a foreign passport is conclusive proof of that acquisition and that the Indian passport must be surrendered (Indian Citizenship Act 1955, s. 9, as quoted in

the India Code; High Commission of India, Kampala, renunciation page, updated October 22, 2026). The Overseas Citizen of India card isn't citizenship, and it excludes anyone with a Pakistani or Bangladeshi parent, grandparent or great-grandparent (Ministry of Home Affairs, Online OCI Services). [Indian](#) applicants therefore face an outcome, not a form to file. Vietnam sits between: its nationality law keeps the principle of one nationality, requires release from Vietnamese nationality to be granted by decision, and lets some naturalized persons keep a foreign nationality only with the President's permission (Law on Vietnamese Nationality as consolidated July 24, 2025, Arts. 4, 19 and 27). The consolidated text read lists no automatic loss on acquiring a foreign nationality, so [Vietnamese](#) applicants should read the release and retention articles together.

Pakistan reverses the usual order. Section 14(1) of the Citizenship Act 1951 says a citizen who also holds another nationality ceases to be a Pakistani citizen unless the other nationality is renounced, while section 14(3) exempts the United Kingdom and countries the Federal Government notifies in the Gazette (Pakistan Citizenship Act 1951, ss. 14 and 14A, Pakistan Code). The only list found is the Directorate General of Immigration and Passports page naming 22 countries, last modified January 9, 2026, worded for foreigners acquiring Pakistani citizenship (DGI&P, Dual Nationality); the Gazette notification itself wasn't found, so [Pakistani](#) applicants should treat the outbound reading as unconfirmed. Nigeria's Constitution forfeits citizenship for a person not a citizen by birth who acquires or retains another nationality, and tolerates it for citizens by birth (Constitution of the Federal Republic of Nigeria, s. 28). That wording was read on an independent constitution site, not an official host.

Permission regimes work differently. In Egypt, a citizen may not acquire a foreign nationality without a decree of the Interior Minister; without it the person stays Egyptian in every respect but may be stripped by the Cabinet, and with permission Egyptian nationality ends unless retention was included and claimed within a year (Law No. 26 of 1975, Arts. 10 and 16, UNHCR translation). That is why [Egyptian](#) applicants meet a sequencing question: permission comes before acquisition. Syria's decree similarly ends nationality only after a decree allowing renunciation, leaves it intact when a second nationality is taken without permission, and allows deprivation by decree (Legislative Decree No. 276 of 1969, Arts. 10 and 21, UNHCR translation). Lebanon's 1925 decree ends Lebanese status only where acquisition was authorized by a Head of State decree (Decree No. 15 of 1925, Art. 8), so [Lebanese](#) nationality is retained otherwise. Iran lets nationals renounce only with Council of Ministers permission, at age 25 and after military service (Civil Code, Art. 988, Iranian Foreign Ministry mission page), and treats a foreign nationality acquired outside the law as void, leaving the person Iranian and barred from government posts (Civil Code, Art. 989, university copy; the 2025 amendment reported by Iranian legal news).

The remaining jurisdictions tolerate a second nationality, with different edges. Russia treats a dual or multiple national as Russian only, does not end citizenship on acquisition, and requires notice of each foreign citizenship or residence permit within 60 calendar days, with 60 days from entry for people abroad (Federal Law No. 138-FZ of April 28, 2023, Arts. 10 and 11). The penalties set in 2014 were a fine of 500 to 1,000 rubles under the Administrative Code and, under the Criminal Code, a fine up to 200,000 rubles or other penalties; the notice window has been 60 days since the duty began in 2014, with a 30-day variant applying for a time to people who were abroad (Federal Law No. 142-FZ of June 4, 2014). Türkiye's Law 5901 records multiple citizenship and ends Turkish citizenship only on exit permission (Law No. 5901, Arts. 25 and 44). Iraq's constitution allows multiple citizenships but requires senior, security and sovereign office-holders to abandon others, and its 2006 law lets a person keep Iraqi nationality unless they renounce in writing (Constitution of Iraq, Art. 18; Law No. 26 of 2006, Arts. 9 and 10). The State Department says US law doesn't require a choice, and loss follows only from voluntarily performing an expatriating act with intent to relinquish (US Department of State, Dual Nationality; 8 U.S.C. 1481). For [American](#) readers that's the State Department's position, and for [British](#) readers GOV.UK says dual citizenship is allowed, though British dual nationals can't get consular help in the other country where they hold citizenship (GOV.UK, Dual citizenship, updated September 24, 2026).

Office-holders and family members

Two edges recur across these statutes and deserve their own note. The first concerns public office. Iraq's constitution requires holders of senior, security or sovereign posts to give up other citizenships, Vietnam's 2025 amendment says Party, State and armed-forces office-holders must hold Vietnamese nationality only, Pakistan's 2026 rules require prior approval and annual disclosure for federal civil servants, and Iran bars those with an unlawfully acquired foreign nationality from government posts (Constitution of Iraq, Art. 18; Law on Vietnamese Nationality, Art. 5; Auditor General of Pakistan memorandum, June 10, 2026; Civil Code, Art. 989). China goes further for state functionaries and serving military personnel, who may not renounce Chinese nationality at all (Nationality Law, Art. 12). A family with a public-sector member has a different screen from one in private business.

The second is how dependents follow the principal. Egypt allows a permission to cover a wife and minor children if retention is declared within a year, and otherwise minors may lose Egyptian nationality when a father's change carries them into the new one (Law No. 26 of 1975, Arts. 10 and 11). India's mission guidance says section 9 termination doesn't affect a minor child's citizenship, unlike renunciation (High Commission of India, Kampala). Iraq's law says minor children lose Iraqi nationality when a parent loses it, with a route back after returning and residing for a year (Law No. 26 of 2006, Art. 14). Pakistan's section 14(1A) leaves persons under 21 outside the dual-nationality rule (Pakistan Citizenship Act 1951, s. 14). Chapter 7 returns to family inclusion on the unit side; the home-country side follows rules of its own.

D. Notable movement this cycle

Five changes sit in or near the window. Vietnam's amending Law No. 79/2025/QH15 took effect July 1, 2025, adding limits on office-holders with foreign nationality (Law on Vietnamese Nationality as consolidated, July 24, 2025). Iran's 2025 Law on Support of Iranians Abroad is reported to have deleted the property-sale sanction from Civil Code Article 989; no official text could be retrieved. Pakistan notified Civil Servants (Disclosure and Regulation of Foreign Nationality) Rules on June 1, 2026, requiring prior approval for seeking foreign nationality and annual disclosure, for federal civil servants only (Auditor General of Pakistan memorandum of June 10, 2026; Dawn, October 3, 2026). Nigeria's HB. 2059 would add a citizenship-by-investment class through a constitutional alteration, and as of September 2026 it hadn't passed (Daily Trust, September 18, 2026). Russia's Ministry of Foreign Affairs draft for January 1, 2028 remains a draft, reportedly not yet in the Duma. China's Decree No. 841, effective September 15, 2026, isn't a nationality law; it's an exit and entry regulation whose only nationality link obliges intermediaries to refuse irregular foreign-nationality handling for public officials and military personnel (State Council Decree No. 841, Art. 10).

E. Reader implications

Treat home-country law as a gate with three categories of consequence: loss, permission and notice. A reader in a loss jurisdiction is deciding between passports, not adding one, and should price that in before any investment is made. A reader in a permission jurisdiction needs the permission or release in hand before the second nationality is acquired; asking afterwards isn't the same thing. A reader in a notice jurisdiction has a clock that starts at acquisition. Where the text read is secondary or an unofficial translation, as for Egypt, Syria, Lebanon and Iran, the point to confirm is the current official text, which may have been amended.

Home-country law doesn't ask whether a passport was bought; it asks whether a second nationality was acquired, and what its own statute says to do next.

Compliance and Due Diligence: The Control Framework Around the Six Screens

The control framework around citizenship by investment has five layers, and the one closest to the family, the intermediary, is the one the published texts regulate least precisely: none of the programs' official texts read here sets a cap on agent commissions, and the international benchmark says there was, as of 2023, no regulatory regime for third-party due diligence providers. That matters because the six screens in this e-book are applied by people as well as by rules. This section maps who applies which control, what the texts say each must do, and which warning signs the international bodies describe.

The five layers

The first layer is the unit, which decides. The second is the licensed agent or promoter who files and markets. The third is the due diligence provider who checks. The fourth is the bank or developer through which money moves, and the fifth is the destination state that accepts the passport afterward. The FATF and OECD report puts the point in a sentence: multi-tier vetting should be done by the agent, the agency and any third-party recipient of funds independently, with each layer not relying on screening done by the others (OECD/FATF, *Misuse of Citizenship and Residency by Investment Programmes*, 2023, para. 139). *A control that depends on the next layer having already done the work isn't a control.*

What the texts require of agents

Each of the five Eastern Caribbean programs licenses agents by statute and can revoke the license, but the conditions differ. Antigua and Barbuda licenses only natural persons who are citizens and have been resident for at least seven years, requires professional indemnity insurance of at least US\$3 million, and bars anyone investigated for fraud or money laundering (Antigua and Barbuda, *Citizenship by Investment Regulations* 2016, reg. 4). Dominica requires an agent to hold a Dominican office with at least three staff, to submit an anti-money-laundering and know-your-customer policy and to take responsibility for all promotion by sub-agents (Dominica, S.R.O. 8 of 2024, reg. 12). St Kitts and Nevis limits authorization to licensed consultancy bodies, attorneys and chartered accountants, and requires an approved AML and KYC policy (St Kitts and Nevis, S.R.O. 20 of 2024, reg. 28). Grenada and Saint Lucia license local agents by Act and allow revocation where integrity falls below the standard reasonably expected (Grenada *Citizenship by Investment Act* 2013, s. 4; Saint Lucia, *Citizenship by Investment Act* 2015, s. 31).

The conduct rule that stands out is the price floor. Dominica prohibits claiming that citizenship is available at investment costs below the minimum, and St Kitts and Nevis bans misstating the prescribed contribution and offering special discounts, with breaches leading to removal and blacklisting on the unit's website (Dominica, S.R.O. 8 of 2024, Sch. 2; St Kitts and Nevis, S.R.O. 20 of 2024, Sch. 2 and reg. 27). Grenada's agency said in September 2024 that unauthorized pricing strategies are illegal and can lead to revocation of licenses, citizenship and project decertification (Investment Migration Agency Grenada, press release, September 19, 2024). The enforcement record shows these rules used. Grenada's March 2025 circular described a developer-affiliated marketing agent and its sub-agents in unlawful discounting and an unapproved US\$100,000 financing arrangement, with applicants denied, and its June 2025 circular suspended a local agent over alleged misappropriation of investor funds (Investment Migration Agency Grenada, Circulars 2 and 7 of 2025). St Kitts and Nevis's 2025 action, covered in Chapter 8, is the third example.

The regional layer, and its status

The Eastern Caribbean agreement creating a regional regulator would move licensing upward. Under it, a unit examining an agent, promoter, due diligence provider, developer or escrow agent must obtain a no-objection notice from the regulator before issuing or renewing a license, and a license issued without one is null and void; licenses run three years and the regulator keeps a register, with a summary public (Eastern Caribbean Citizenship by

Investment Regulatory Authority Agreement, Arts. 36, 38 and 39). It would require a due diligence provider to have no conflict of interest or financial connection with an applicant, a licensee or a unit officer, and let the regulator audit due diligence and order a re-assessment (Agreement, Arts. 36.6(d) and 54). It states no commission cap but lets the regulator's board review and determine the commission payable to an agent, and its commencement depends on the fifth instrument of ratification being deposited (Agreement, Arts. 84 and 95). The regulator's own site says operations begin in late 2026, and this e-book treats its start as unconfirmed (ECCIRA, About).

Warning signs the international bodies describe

The 2023 report has no list titled red flags, but its text describes typologies that work as one. It warns of name changes and applicants who can alter their names during the process, of holding multiple passports and documents with slightly different details, and of high-risk individuals gifting wealth to a spouse who then leads the application (OECD/FATF, 2023, paras. 67 to 70 and 73). On money, it describes remittances from unrelated third parties, a single offshore company funding unrelated applicants, property priced well above market, and loans disguised as family lending (OECD/FATF, 2023, paras. 89 to 97 and Box 3.8). On process, it flags decisions in 48 hours, advertising that stresses secrecy or no genuine link, and time-limited discount offers (OECD/FATF, 2023, paras. 72, 127 and 128). It also notes that agents paid by volume, or required to meet annual quotas, can be pushed toward taking applicants regardless of qualification (OECD/FATF, 2023, para. 45). These describe risks in how a process runs, so a family can read several of them as reasons to question a quote or an adviser.

Banks and the question of tagging

Financial institutions sit at the fourth layer. The report suggests, without making it binding, that issuers mark passports acquired through investment, that institutions ask for all nationalities and the original birth certificate when a CBI document is the proof of identity, and that they consider tagging accounts and suspicious transaction reports linked to such passports (OECD/FATF, 2023, paras. 164 and 170 to 172). It adds a caution: tagging aims to apply appropriate due diligence without subjecting every citizen of an issuing country to unwarranted enhanced diligence (OECD/FATF, 2023, para. 164). For a passport holder, the practical effect is a longer onboarding conversation, not a presumption.

What readers can take from the framework

Three practical readings follow, none of them a recommendation about a particular firm or program. First, check the license: each unit publishes a list of authorized agents and a list of those it says aren't, and a promoter who can't show a valid license number is outside the framework (Dominica CBIU, authorized agents and blacklist pages; St Kitts and Nevis CIU, blacklisted agents page). Second, a price below the published minimum is a rule breach, not a discount, in every program that states a price floor. Third, a source-of-funds file built by one party and checked by the same party is a conflict, which is why the report calls for independent due diligence providers and firewalls between decision-makers and marketing agents (OECD/FATF, 2023, paras. 129 and 151). Tisoro is itself an intermediary of the kind this section describes, which is why its role is disclosed at the start of the body, and these controls apply to it as to any other.

The framework's weakest point is also its most visible one: the person who sits between the family and the file.

Cross-Cutting Findings and the 2026 Read-Through

Read together, the six screens say one thing the single chapters can't: eligibility for a second citizenship is decided by rules that sit in different jurisdictions and don't know about each other, and in 2026 the rule with the most leverage over the outcome isn't the issuing unit's. The chapters took the screens one at a time. This section sets them against each other, names the findings that cut across them, and reads the cycle as it stood on October 26, 2026.

Six findings that cut across the screens

First, the public record of demand is partial by design. Two units publish a split by passport or birth country, one counts applications and the other reports shares, and the Commission's list of successful applicants is a floor on an unknown unit (Chapter 1). Even the Commission's totals don't reconcile: its estimate of around 107,000 passports issued doesn't match the table beneath it, and its rejection rates for 2024 run from 1.7 percent to 43.9 percent while its text calls them very low (European Commission, COM(2025) 792; SWD(2025) 429). A reader who needs a number by nationality should treat the absence as the finding.

Second, access is decided rule by rule, not passport by passport. Tisoro's public pages list between 3 and 8 of the 8 citizenship programs as open depending on the passport, and the unit rules explain some of the spread: the Commission's list names Russia for all five Eastern Caribbean programs, and Iran is excluded outright in three programs and conditioned in two (Tisoro, Citizenship by Nationality; European Commission, SWD(2025) 429; Chapter 2). Other counts don't trace to any published list. Where a count can't be traced, it's a classification, not a rule.

Third, the screens interact, and the interaction is where files fail. The OFAC entries of October 1, 2026, which record nationality Iran and alt. nationality Dominica, show a sanctions screen reaching past the passport on the form (US Treasury, OFAC, Recent Actions, October 1, 2026). A home-country law that ends the first nationality on voluntary acquisition changes what the funds screen is protecting, and a refusal in one program can travel to the others through shared records, as Dominica's monthly sharing of denied names and Saint Lucia's OECS denial ground show (Dominica, S.R.O. 8 of 2024, reg. 4(11); Saint Lucia, Act No. 22 of 2025, s. 36(3)(b)). A single unit rarely sees all six screens.

Fourth, the evidence trail depends more on the home market than on the unit. Units publish short document lists, some from forms dated 2017 to 2022, while central banks set what money may leave and with what paperwork. China treats US\$50,000 as a documentation threshold, India allows US\$250,000 a year with a declaration, and Lebanon releases pre-2019 deposits in capped monthly amounts (SAFE, Huifa [2020] No. 14; Reserve Bank of India, Master Direction on the LRS; Banque du Liban, Basic Circulars 158 and 166; Chapter 5). The same evidence category carries three different frictions.

Fifth, the binding constraint has moved from the unit to the destination. A unit can accept an applicant and still sell a passport that other governments treat as a risk. The EU's revised mechanism lists the operation of an investor citizenship scheme without genuine link as a ground for suspending visa-free status, applying from December 30, 2025; the UK imposed visas on Saint Lucia on March 5, 2026; and the United States suspended entry for two Eastern Caribbean nationalities from January 1, 2026 (EUR-Lex, Regulation (EU) 2025/2441, Art. 8a(1)(e); UK Home Office, HC 1691; White House, Proclamation 10998; Chapter 6).

Sixth, enforcement and governance now follow the grant. St Kitts and Nevis revoked the citizenship of 13 individuals and dependents in March 2025 over false representation and concealment, and programs are adding biometrics, residency and caps for people already approved (SKNIS, April 7, 2025; Chapter 8). *A file that cleared every screen at approval can still be reopened by a later rule or an old statement.*

How the screens fit together

Laid end to end, the screens form a sequence with a logic. Program access and sanctions screens decide whether a file can start at all. Home-country law and the funds trail decide whether it can be built honestly and lawfully. Visa history and family structure decide who is on it and what the passport will be worth. A failure early in the sequence is cheap for everyone, because nothing has been spent. A failure late, such as a family member who can't be documented or a home law that cancels the first nationality, can come after the investment has been made, which is why the order in this e-book runs from rules that end a file to documents that complete it.

The 2026 read-through

The cycle's evidence is mixed in quality, and the read-through has to say so. What is confirmed: the Court of Justice's April 2025 ruling that a Member State can't grant nationality for predetermined payments or investments, Regulation (EU) 2025/2441, the Commission's eighth report, the UK visa decisions and Proclamation 10998 (Court of Justice of the European Union, Press Release No 52/25; EUR-Lex; European Commission, COM(2025) 792). What is stated by one government and not published by the Commission: a June 25, 2026 letter asking for a phase-out by June 1, 2028 (Government of Antigua and Barbuda, July 6, 2026). What rests on press remarks: a commitment date of November 12, 2026 and a Cabinet leaning toward suspension in Antigua and Barbuda (Caribpulse, October 25, 2026). No official release from the Commission or the five governments dated October 24 to 26 changes that picture.

Three dates frame what comes next, and none is a forecast. The FATF's October plenary ends on October 30 with its list outcomes. The reported November 12 date would fall inside the next fortnight, and the Commission's next report is expected in December (FATF, FATF Week, October 2026; Government of Antigua and Barbuda, July 6, 2026). Programs have shown they can change shape rather than close: Saint Lucia added a residency and genuine-link rule and an approvals cap, and St Kitts and Nevis added biometric enrollment (Saint Lucia, Act No. 22 of 2025, s. 30A; St Kitts and Nevis CIU, Biometrics). The IMF reads the revenue stake plainly: Dominica is highly reliant on these flows, and St Kitts and Nevis's deficit widened as program revenue fell (IMF, Dominica 2026 Article IV; IMF, St Kitts and Nevis 2026 Article IV press release).

What readers can take from it

Sort the findings by how long they hold. Rules in statute, such as home-country nationality law, are slow-moving and can be checked against the text. Lists and unit definitions change within months, and pages and gazettes can disagree for a time, as St Kitts and Nevis's adult-child rule shows. Destination decisions can move without notice. A reader weighing a second citizenship should therefore ask of any statement who made it, what instrument it sits in and what date it carries. For advisors and banks, the practical point is the same one in different words: the nationality of record, the names used and the unit's own file are part of one trail, and a gap anywhere shows up later.

The e-book's limits belong in the read-through too. No source publishes counts of applicants by passport at the level the question needs, official nationality data are absent for most programs, and several home-country texts were available only in translation or secondary copies. Each of those gaps is stated where it arises, and a fresh check of the dated items is warranted before any decision rests on them.

“The unit decides who gets in; other governments decide what the passport is worth once they're in.”

— The author, Editor-in-Chief & News Director, Tisoro Intelligence

Methodology Note

This e-book answers one question: which rules decide whether a family can obtain a second citizenship by investment, and in what order. Its evidence is dated to a cut-off of October 26, 2026, and every figure carries its source, an as-of date and a grade of confirmed, announced or reported, defined in Chapter 10.

Sources and hierarchy

Primary texts come first: statutes, regulations, gazettes and the citizenship units' own pages and forms. International bodies follow, namely the European Commission, the FATF and OECD, the IMF, UNHCR and the UN Treaty Collection. Government statements come next and press accounts last, named with outlet and date. Where an official source and a secondary one conflict, the official source governs and the conflict is stated. Competitor advisory sites and passport indexes aren't used. Texts available only in translation, or as copies on a third-party host, are identified where they are cited, and several were still to be checked against an official host at the cut-off.

What the e-book counts, and what it doesn't

The e-book covers eight citizenship programs. Open-program counts by passport come from Tisoro's public nationality pages and are Tisoro's own classification of access, assessed case by case, not government statistics (Tisoro, Citizenship by Nationality). Where no source publishes a figure, such as nationality data for most units, the text says so and nothing is estimated.

Calculations

Three calculations are the e-book's own and are labeled where they appear. The ten leading birth countries in Antigua and Barbuda's report account for about 65 percent of 5,203 applications, from 3,371 applications in the table (Antigua and Barbuda CIU, Six-Monthly Report, January 1 to June 30, 2024). The 2024 rejection rates in the Commission's table were reproduced as rejections divided by applications received in the same year, which may mix cohorts. And the passport entries in that table add up to 137,325, against the Commission's estimate of about 107,000, a difference the Commission doesn't explain (European Commission, SWD(2025) 429).

Currency, dates and style

Amounts are in the currency the source prints, with US dollars unless marked EC\$ for Eastern Caribbean dollars. Dates follow US order. The e-book describes categories and selection logic and recommends no program, firm or course of action for any profile. Chapters on sanctions-adjacent cohorts were reviewed under the Editor-in-Chief sign-off tier.

Corrections and contact

Readers who find an error, or a figure that an issuing body has since changed, can write to publications@tisoroglobal.com. Rights, permissions and legal questions go to legal@tisoroglobal.com. Corrections are issued as a new version and dated.

Sources and Citations

[View all sources here](#)

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Syed Savez Ali is Editor-in-Chief and News Director of Tisoro Global. In that role he heads the Tisoro Intelligence editorial board, which spans five areas of Tisoro's publishing: the Passport Index, Publications, the Newsroom, the Editorial Team and GLOPIA. Tisoro Intelligence is the editorial and research division of Tisoro Global, and it publishes under named authors, with each work carrying a human byline.

This e-book was written under his direction and prepared with TG CoAuth, Tisoro's co-authoring engine, which assembles drafts from researched material and source documentation while the author directs the work and decides what is published. Its sections on sanctions-adjacent cohorts fall under the Editor-in-Chief's sign-off.

Readers who want to reach the author's desk can write to publications@tisoroglobal.com.

About Tisoro

Tisoro Global describes itself as the world's first AI-powered investment migration advisory. It advises families on citizenship by investment and residence by investment, and it covers 8 citizenship countries and 13 residence countries, the same eight programs this e-book examines (Tisoro, About). Its work runs from matching a family to the programs open to its passport, through source-of-funds documentation and sanctions screening, to submission with the licensed filing authority.

Tisoro Intelligence is the editorial and research division that publishes this e-book. It writes under named authors, sources its output to the official record and applies an editorial standard that routes every publication to a named human sign-off. It also publishes industry insight, market research on residence by investment, broadcast journalism and a quarterly passport index.

Tisoro's advisory side sets out five commitments, which it calls [guarantees](#): the 100% Approval Guarantee, the Lowest Legitimate Price Guarantee, the Fastest Delivery Guarantee, the Best Program Match Guarantee and 24/7 Secure Communication. They are Tisoro's own service commitments and describe how it works with families. They aren't promises about any government's decision, which belongs to the issuing authority.

Tisoro also describes its AI systems as the way it does that work, and the [pages on those systems](#) explain what each one does. Readers who want to see how Tisoro's access counts by nationality sit beside the rules in this e-book can find them on its public nationality pages.

For publication questions write to publications@tisoroglobal.com, and for legal matters to legal@tisoroglobal.com.

Where to Next

If this e-book has done its job, you now know which questions come first and in what order. The next step is to see how those questions apply to your own passport. Tisoro's [citizenship by investment](#) pages show which of the eight programs are listed as open for each nationality, and how Tisoro assesses a family's case by case position before anything is submitted.

Bring your passports, your family structure and a short account of where your funds come from. Each issuing government decides every application, and a clear picture of the screens in this e-book is the best preparation for that conversation.

[Read the complete edition.](#)

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