



**DEPARTMENT OF THE TREASURY  
OFFICE OF FOREIGN ASSETS CONTROL**



**Enforcement Release: February 25, 2026**

**An Individual Settles with OFAC for \$3,777,000  
Related to Apparent Violations of Syrian Sanctions Regulations**

A natural U.S. person (“U.S. Person-1”) has agreed to pay \$3,777,000 to settle their potential civil liability for 20 apparent violations of OFAC sanctions on Syria. Between January 2018 and December 2021, when U.S. sanctions on Syria were in place, U.S. Person-1 provided managerial services to Syrian entities in their role as an executive and board member for four Syrian real estate companies. These services included reviewing and signing financial statements, approving operational and employee expenses, and supervising the collection of service fees. The apparent violations occurred under the former regime of Syrian president Bashar al-Assad, and prior to the removal of U.S. sanctions on Syria in 2025.

The settlement amount reflects OFAC’s determination that the apparent violations were not voluntarily self-disclosed and were egregious. This enforcement action highlights the obligations of all U.S. persons, including U.S. citizens residing outside of the United States, to comply with OFAC sanctions. The Federal Bureau of Investigation’s Dallas Field Office provided valuable support in this investigation.

**Description of the Apparent Violations**

U.S. Person-1 obtained U.S. permanent residency in the 1990s and subsequently became a naturalized citizen. While residing outside the United States, U.S. Person-1 held senior executive and board positions in real estate development companies operating in the Middle East and North America. Beginning in the mid-2000s, U.S. Person-1 also assumed multiple executive and board roles in several Syrian-incorporated real estate entities (the “Syrian Companies”). The Syrian Companies were established and operated as joint ventures between multiple UAE companies and individuals, including a UAE company where U.S. Person-1 also held senior positions. From their inception, U.S. Person-1 played a key role in initiating projects for and managing the business activities of the Syrian Companies. These companies and their holdings have historically been valued as high as over \$1.5 billion.

Starting after 2005, the Syrian Companies constructed and operated several large-scale luxury real estate projects in Syria. The properties included planned communities with numerous indoor and outdoor amenities and commercial centers. Over the next decade, the Syrian Companies constructed and operated these developments. From their inception, including between 2018 and 2021, U.S. Person-1 served in an active leadership role in the Syrian Companies and provided a range of managerial services in support of their operations in Syria. For example, U.S. Person-1 routinely reviewed and approved operational and employee expenses; received, modified, and approved budgets; and signed company financial statements. U.S. Person-1 also participated in board and shareholder meetings and was involved in personnel management, including the hiring, promotion, and termination of employees, and day-to-day matters such as maintenance activities. Similarly, U.S. Person-1 was involved in the Syrian Companies’ marketing activities.

U.S. Person-1 knew or should have known that Syria was subject to sanctions, and that their conduct was prohibited. Furthermore, after engaging in this conduct for many years, U.S. Person-1 only stopped after receiving an administrative subpoena from OFAC.

In engaging in the conduct described above between 2018 and 2021, U.S. Person-1 provided managerial services to Syria on 20 occasions in apparent violation of section 542.207 of the Syrian Sanctions Regulations (SySR) (the “Apparent Violations”) then in effect.

### **Background on U.S. Sanctions on Syria**

U.S. Person-1’s Apparent Violations occurred under the former regime of Syrian president Bashar al-Assad, which undermined the peace, security, and stability of the Middle East region. As has been extensively documented, al-Assad’s authoritarian rule resulted in countless human rights abuses, including the use of chemical weapons against the people of Syria, the perpetration of war crimes and extrajudicial killings, and the proliferation of narcotics trafficking networks in Syria and abroad. In response to such conduct, Syria came under broad U.S. sanctions in 2011, including a prohibition on the export of services to Syria by U.S. persons. After the conduct at issue occurred, and following the fall of the al-Assad regime, in 2025 the United States began lifting sanctions on Syria.<sup>1</sup> On December 18, 2025, the Fiscal Year 2026 National Defense Authorization Act was signed into law, which included a repeal of the Caesar Act.<sup>2</sup> As of today, U.S. persons may provide services to, invest in, and otherwise engage in economic activity with respect to Syria, with certain limited and specified exceptions such as dealing with certain blocked persons and U.S. export controls.<sup>3</sup>

### **Penalty Calculations and General Factors Analysis**

OFAC determined that U.S. Person-1 did not voluntarily self-disclose the Apparent Violations and that the Apparent Violations constitute an egregious case. Accordingly, under OFAC’s Economic Sanctions Enforcement Guidelines, 31 C.F.R. part 501, Appendix A (“Enforcement Guidelines”), the base civil monetary penalty applicable in this matter equals the applicable schedule amount, which is \$7,554,000.

The settlement amount of **\$3,777,000** reflects OFAC’s consideration of the General Factors under the Enforcement Guidelines.

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<sup>1</sup> On June 30, 2025, President Trump issued E.O. 14312, “Providing for the Revocation of Syria Sanctions,” which revoked, effective July 1, 2025, six Executive orders that formed the foundation of the Syrian Sanctions Regulations (SySR), and terminated the national emergency underlying those Executive orders, which resulted in the removal of the SySR effective July 1, 2025.

<sup>2</sup> See OFAC, [Promoting Accountability for Assad and Regional Stabilization Sanctions \(PAARSS\)-related Designations Updates; Publication of Amended Tri-Seal Advisory: Sanctions and Export Controls Relief for Syria](#), published December 23, 2025.

<sup>3</sup> [Tri-Seal Advisory: Sanctions and Export Controls Relief for Syria](#), updated December 2025.

OFAC has determined the following to be **aggravating factors**:

- (1) U.S. Person-1 acted with reckless disregard for U.S. sanctions requirements. U.S. Person-1 knew or should have known that Syria was subject to sanctions, and that U.S. Person-1's activities in Syria were prohibited. U.S. Person-1 also engaged in a multi-year pattern of violative conduct and only stopped after receiving an administrative subpoena from OFAC.
- (2) U.S. Person-1 had actual knowledge that they were providing managerial services to firms organized and located in Syria. U.S. Person-1 knowingly served in executive and board service roles for multiple firms in Syria, and knew they were responsible for managing them and ensuring their continued operations in Syria.
- (3) In providing these services, U.S. Person-1 undermined the objectives of the former Syria sanctions program by conferring economic benefits to the Syrian economy under al-Assad, including by developing the country's luxury real estate sector. By providing services that were necessary to the operation of the Syrian Companies, U.S. Person-1 helped make the projects and their continued operations possible.
- (4) U.S. Person-1 is an experienced real estate professional with experience working in executive and/or board service functions for real estate-related companies with longstanding and extensive operations in the Middle East and North America.

OFAC has determined the following to be **mitigating factors**:

- (1) U.S. Person-1 has not received a Penalty Notice or a Finding of Violation from OFAC in the preceding five years.
- (2) Following OFAC's initial administrative subpoena, U.S. Person-1's cooperation was initially limited. Following their receipt of a Pre-Penalty Notice, U.S. Person-1 retained new counsel and improved their cooperation. U.S. Person-1's substantial delay in meaningfully cooperating resulted in highly limited mitigation credit for cooperation.
- (3) U.S. Person-1 signed a Tolling Agreement with OFAC.

### **Compliance Considerations**

This case highlights that OFAC's prohibitions apply to all U.S. persons, including U.S. citizens who are residing abroad. As in most OFAC sanctions programs, OFAC's Syria sanctions program defined a U.S. person to include any U.S. citizen or permanent resident,<sup>4</sup> wherever located. Upon becoming a U.S. lawful permanent resident, and later a naturalized citizen, U.S. Person-1 became subject to the same compliance obligations across sanctions program as all other U.S. persons, regardless of their country of residence or operations. Even though U.S. Person-1 resided at all relevant times outside of the United States and the Apparent Violations did not otherwise involve the United States, U.S. Person-1's conduct was prohibited.

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<sup>4</sup> 31 C.F.R. § 542.325 (defining "United States person; U.S. person").

This case also underscores that OFAC will hold those who violate U.S. sanctions accountable, even if such sanctions are later lifted. It is not a defense to liability that U.S. sanctions are no longer in place, and parties should not attempt to “read the tea leaves” and get ahead of any potential changes to U.S. sanctions in a manner that violates OFAC regulations. OFAC will actively enforce against violations of the sanctions in force at the time the relevant conduct occurred.<sup>5</sup>

Today, however, U.S. sanctions on Syria are no longer in place, and U.S. persons, wherever located, may as a general matter do business in the country and with Syrian businesses, with limited exceptions.

Finally, this case illustrates the importance of cooperating with OFAC’s investigations. As part of its analysis under the General Factors Affecting Administrative Action, OFAC considers the nature and extent of an investigative subject’s cooperation with the agency’s investigation when considering both how to resolve an investigation and the size of any potential penalty. Timely and fulsome cooperation demonstrates that an investigative subject understands the seriousness of their sanctions compliance obligations. It also saves OFAC critical time and resources by allowing the office to complete its investigation efficiently. Failure to cooperate in a manner that is complete and satisfactory not only risks foregoing mitigation credit for cooperation, but can also risk standalone penalties under OFAC’s Reporting, Procedures and Penalties Regulations.<sup>6</sup>

### **OFAC Enforcement and Compliance Resources**

On May 2, 2019, OFAC published [A Framework for OFAC Compliance Commitments](#) in order to provide organizations subject to U.S. jurisdiction, as well as foreign entities that conduct business in or with the United States or U.S. persons, or that use goods or services exported from the United States, with OFAC’s perspective on the essential components of a sanctions compliance program. The Framework also outlines how OFAC may incorporate these components into its evaluation of apparent violations and resolution of investigations resulting in settlements. The Framework includes an appendix that offers a brief analysis of some of the root causes of apparent violations of U.S. economic and trade sanctions programs OFAC has identified during its investigative process.

OFAC makes available on its website a variety of resources designed to assist with sanctions implementation and compliance, including [industry-specific guidance](#), [instructive videos](#), [answers to frequently asked questions](#), and [tools for searching OFAC’s sanctions lists](#).

Information concerning the civil penalties process can be found in the OFAC regulations governing each sanctions program; the Reporting, Procedures and Penalties Regulations, 31 C.F.R. part 501; and the Economic Sanctions Enforcement Guidelines, 31 C.F.R. part 501,

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<sup>5</sup> As further explained in the [November 2025 Tri-Seal Advisory](#) on Sanctions and Export Controls Relief for Syria, OFAC will continue to enforce all sanctions for conduct that occurred prior to the lifting of sanctions on Syria, and will continue to enforce against violations of Syria-related sanctions (such as designations) that remain in effect.

<sup>6</sup> See 31 C.F.R. part 501.

app. A. These references, as well as recent civil penalties and enforcement information, can be found on OFAC's website at <https://ofac.treasury.gov/civil-penalties-and-enforcement-information>.

### **Sanctions Whistleblower Program**

The U.S. Department of the Treasury's Financial Crimes Enforcement Network (FinCEN) maintains a [whistleblower incentive program](#) for violations of OFAC-administered sanctions, in addition to other violations of the International Emergency Economic Powers Act and violations of the Bank Secrecy Act. Individuals located in the United States or abroad who provide information about sanctions violations may be eligible for awards if the information they provide leads to a successful enforcement action that results in monetary penalties exceeding \$1,000,000. The incentive program is available for whistleblowers providing information relating to potential violations in any commercial sector.

For more information regarding OFAC regulations, please visit: <https://ofac.treasury.gov>.