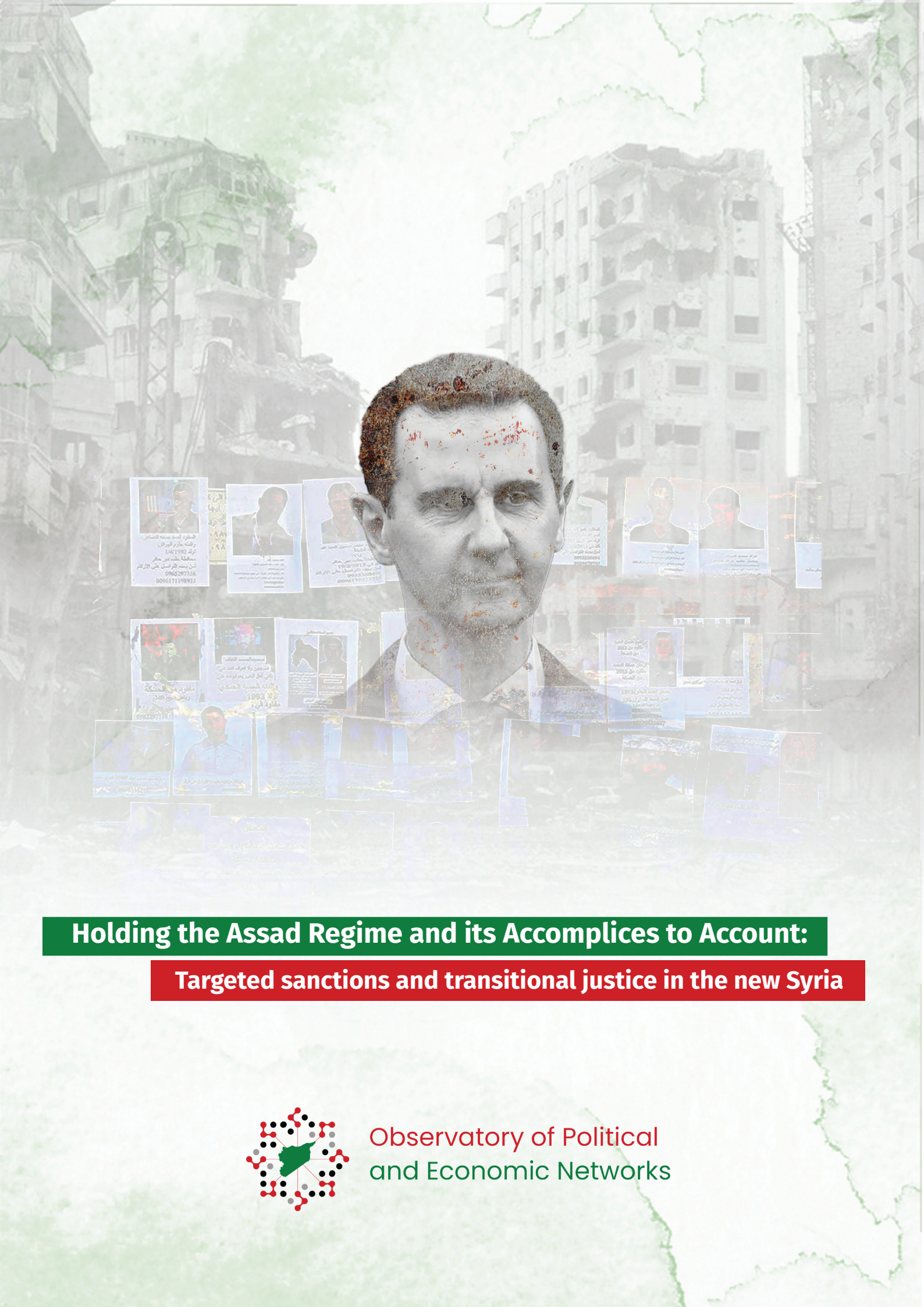




Holding the Assad Regime and its Accomplices to Account:

Targeted sanctions and transitional justice in the new Syria



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and Economic Networks**

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When Bashar al-Assad was in power, the saying was:

الرئيس كويس بس يلي حواليه عرصات

The President is good, but those around him are thugs.

Now it is:

نحن كويسين بس الرئيس هو كان عرصة

We are good, but the President was a thug.

Report prepared for the Observatory of Political and Economic Networks

<https://www.opensyr.com/en>

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Introduction

Following the overthrow of the Assad regime on 8 December 2024, the debate on Syria's transition and rebuilding efforts has largely focused on the lifting of Western sanctions imposed against Syria since the popular uprising and insurgency began in 2011. Sanctioning states, including members of the European Union (EU), the United Kingdom (UK), and the United States (US), have responded to regime change in Damascus, first timidly and then more decisively, by lifting most of their sectoral, trade, and financial sanctions, statedly to give the new Syria a chance to get back on its feet.

Much less attention has been given to the designation of hundreds of regime-affiliated individuals, companies, and other entities who since 2011 have been subjected to sanctions, including asset freezes, exclusion from trade and transactions, and travel bans. The reasons why these individuals and entities were sanctioned vary, but all related to the Assad regime's brutal repression and the responsibility its incumbents and accomplices carry for war crimes and crimes against humanity.

Such individual designations seem to have been primarily informed by expectations that sanctions would put pressure on the Assad regime to stop the mass violence it unleashed on its own population and induce it to allow for a democratic transition, or simply to signal disapproval of the regime's refusal to do either. Yet with the fall of the regime, targeted sanctions have transformed into tools of accountability for the regime's crimes. This report explores the synergy between individual designations or targeted sanctions, the need for transitional justice and accountability in post-Assad Syria, and steps taken in this regard by the transitional government led by Hayat Tahrir al-Sham (HTS) and by sanctioning states.

Targeted sanctions as a tool of accountability

Unlike most trade and financial sanctions against Syria, many individual designations have been kept in place. A large majority of these sanctions involve former incumbents of the Assad regime, officials who held positions of political power, senior military officers, members of the regime's notorious intelligence agencies (*mukhabarat*), business elites affiliated with the regime, drug traffickers linked to the regime, and those who led an array of paramilitary forces or militias on which the regime relied to fight a vicious insurgency. In their review of sanctions against Syria, sanctioning states have made it clear that they do not intend to remove most individual designations. Some restrictive measures have been initiated against some new individuals and entities, mostly in response to the large-scale outbreak of sectarian violence in Syria's coastal region in March 2025. Yet the Syria sanctions regimes of the EU, UK, and US have primarily become a tool to enforce accountability for the Assad regime's past crimes.

The need for a sanctions-based strategy serving and complementing Syria's own transitional justice efforts is apparent. Many former incumbents and supporters of

the Assad regime have moved abroad, placed and hidden their assets outside Syria, and/or continue to rely on international partners and enablers to escape justice. International sanctions can limit their room to maneuver and degrade their assets. Judicial capacities within Syria fall dramatically short of effectively prosecuting war criminals and violators of human rights; targeted sanctions can help to reinforce these capabilities, complement them, and temporarily substitute for them.

Yet the question of how individual designations are to be integrated into Syria's transitional justice efforts, and how this can serve accountability, still needs to be answered, and urgently so. Designated individuals and entities associated with the Assad regime have gone to great lengths to avoid the impact of sanctions, principally by moving to jurisdictions that ignore sanctions imposed by Western states and that show little regard for the accountability concerns motivating them. Furthermore, Syria's interim authorities must somehow strike a balance between responding to the wide demand for accountability, on the one hand, and the imperatives of preserving "civil peace" and promoting economic recovery, on the other. Sanctions can play a positive role in—but can also complicate—where this balance is struck and, as importantly, how it is struck and by whom. For sanctions to serve accountability, they need to be carefully and comprehensively targeted at the Assad regime's most notorious violators of human rights. This also implies a case-by-case reassessment of the listing of individuals who were included in earlier designations.

For individual designations to be effective, merely listing war criminals and their accomplices is insufficient. Efforts should be made to more tightly integrate the designation of individuals and entities into sanctioning states' foreign policies, diplomacy, provision of aid, and judicial endeavors. To effectively and credibly serve accountability for Syria, sanctioning states must also themselves uphold transparency and accountability in their designations. Finally, preparations should be made to go beyond sanctions and disentangle the complexities associated with seizing assets of sanctioned individuals and entities and making these available to victims of the Assad regime. This report does not explore asset seizures and restitution as such, but it may serve as useful background if and when such efforts will be made in the future.

Overview of the report

This report documents and analyzes how since 8 December 2024 sanctioning states, Syria's transitional government, and Syrian civil society have responded to challenges related to transitional justice and accountability through effectively designating and sanctioning those responsible for war crimes and crimes against humanity under the Assad regime. We acknowledge that these challenges have been enormous and that it may still be too early to draw final conclusions.

Imperatives of justice, accountability, and effective sanctioning had to compete with other priorities, including instantaneous conflict management within the highly

polarized society left behind by the Assad regime. The interim authorities faced and still face enormous tasks, including rebuilding state institutions, catering for immediate socio-economic needs, and grappling with aggressive policies taken by Syria's neighbors, including Israel. Yet we observe an alarming tendency for both the meaningful pursuit of transitional justice and the effective alignment of individual designations with accountability for past regime crimes to take a back seat to other considerations—or be overruled by them. Syria's interim authorities have thus far failed to get the balance right between justice and more pragmatic considerations of preserving stability and recovery. As damagingly, the ways in which the transitional government has tried to strike this balance failed to be transparent and inclusive. As a result, it risks losing the very window of opportunity presented by the Assad regime's fall, while victims may feel let down or even encouraged to take matters into their own hands.

Sanctioning states as well have failed thus far to take the robust measures needed to ensure that sanctions are targeted, effectively implemented, and reinforced by other means. They also do not meet the standards of accountability that their own sanctions are supposed to serve. Finally, Syria's transitional government and the sanctioning states have yet to initiate an effective dialogue about how their policies and priorities are to align and complement each other, thereby causing a real risk that their approaches will contradict or clash with each other.

The report takes a close look at the hundreds of designated individuals and entities that have been kept under Western sanctions since the fall of the Assad regime. We provisionally distinguish between “henchmen”, “business elites,” and “bureaucrats” to illustrate how senior regime incumbents (the Assad family, its closest aides, military figures, and *mukhabarat* chiefs), businessmen (“cronies” and “frontmen”), and state officials reinforced and were responsible for repressive, authoritarian rule drenched in mass violence and a denial of basic human rights. The report then presents an assessment of the whereabouts of designated individuals, their assets, and the status of still enlisted entities—primarily sanctioned companies—in the post-Assad era.

We then document and analyze the policies and steps taken by the Syrian transitional government relevant to transitional justice, discuss its vision in this respect, and provide an overview of the criticisms it faced in pursuing accountability generally and vis-à-vis members of the Assad regime more specifically. We then unpack the transitional government's approach to the business elites associated with the former regime, its motivations for striking deals with some of them, and the seizure of some of their assets and restructuring of their companies. The report then focuses on the lists of designated individuals and companies, how they can be improved to better serve accountability for the crimes of the Assad regime, how imposing sanctions can be made more transparent and accountable, and ways in which enforcing existing designations can be made more effective, including by integrating targeted sanctions tightly into sanctioning states' foreign policies, diplomacy, aid provision, and judicial approaches.

Limitations and methodology

This report will focus on the targeted sanctions imposed by the EU, UK, and US only. Other sanctioning states' designations and policies toward Syria, such as those of Switzerland, Australia, and Canada, are not discussed. However, these states' designations show a strong overlap with those of the EU, UK, and US, so our findings are relevant to them as well. We also do not explicitly focus on the individual designations imposed by the UN Security Council on individuals and entities relevant to the situation in Syria. UN-sanctioned individuals and entities almost exclusively comprise those suspected of Jihadist and other "terrorist" activities in Syria.¹ Sharp disagreements within the UN Security Council over the situation in Syria allowed consensus only on sanctioning these individuals and entities, not those accused of human rights abuses associated with the Assad regime.

While the report focuses on accountability issues associated with sanctioned members of the Assad regime and its accomplices, genuine transitional justice in the real world cannot and should not be this selective. Most Syrians realize this, as shown by an opinion survey held in August–July 2025 wherein 65 percent of respondents were of the view that "[a]nyone who took part in war crimes, whether members of the former regime or the opposition" should be held accountable.² Indeed, for an effective and credible strategy toward transitional justice, all perpetrators of gross human rights violations and mass violence during the Syrian conflict should be included. Thus far the Syrian transitional government has failed this test, as it has explicitly reserved its vision for transitional justice to perpetrators of the Assad regime and thereby leaving the door open to impunity for others equally responsible for war crimes and crimes against humanity, including members of HTS and other armed groups allied with the current government.

In our research for this report we faced serious obstacles in obtaining reliable, clear, complete, and verified data. The very difficulty of fully overcoming these obstacles speaks volumes about what is wrong with Syria's post-Assad path toward transitional justice, while also underscoring the lack of transparency in a sanctions regime that claims to pursue accountability for others.

The Assad regime surely played its part in hiding responsibility for its crimes and obscuring the corruption, collusion, and extortion in how it managed the economy. Access to documents prepared by Syria's numerous *mukhabarat* agencies often revealed as much about the Assad regime's crimes as it did about the smoke and mirrors of regime officials—the backstabbing and intrigues in which facts were easily sacrificed for personal gain and survival. After Assad's fall, many members of his regime and its business allies who fled Syria tried to erase their tracks and hide their assets while shielding themselves behind the state sovereignty of host countries that

1- "[United Nations Security Council Consolidated List](#)," accessed 1 November 2025.

2- "[Arab Opinion Index: Syrian Public Opinion Survey 2025](#)," Arab Center Washington DC, 18 September 2025.

are unlikely to prosecute or extradite them. Yet the Syrian transitional government's own lack of transparency and its secrecy when dealing with issues of accountability and transitional justice—especially involving business elites and their companies—equally posed a serious challenge to our efforts to gather data and documentation.

Against this complex background, unsubstantiated rumors and inaccurate reporting circulated, often making it hard to distinguish fact from fiction. We found that the murky and erratic deal-making between the transitional government and Assad regime perpetrators, including businessmen, created an atmosphere where potential informants—such as accountants who served the regime's business elites—were reluctant to come forward with evidence. They could not be sure they would not face repercussions jeopardizing their personal safety, either through reprisals from the new government or from their former regime-linked bosses who had been or could yet be rehabilitated.

Stories based on mistaken identity added to the mix of misinformation, such as when Jamal Younes, a senior commander of the Fourth Division notorious for mass atrocities and subjected to sanctions, seemingly appeared in a video taken at Hmeimim airport in March 2025, shouting pro-Assad slogans and demanding international protection. Yet after the video had gone viral on social media, the same man appeared in a second video denying he was Jamal Younes.³ More often than not, reported arrests of former regime incumbents turned out to be a hoax, such as the alleged capture in January 2025 of Ghassan Jawdat Ismail, the sanctioned chief of the infamous Air Force Intelligence Directorate (AFID).⁴

In short, for a highly contentious topic like the one of this report, and explored under rather tumultuous conditions, one can expect the threshold of proof to be set at a high level, but realistically so. Understandably, most interviewees we consulted for this report asked for their names to be withheld. In other instances, we can only describe the nature and contents of some incriminating documents, because releasing them would likely put those who provided us with these documents in danger. Throughout the report and its appendices, we indicated clearly at what level of confidence we assess the accuracy of the information that we present.

We sent a draft version of this report to the Syrian interim government and the sanctioning states. The British Foreign, Commonwealth and Development Office (FCDO) discussed the report with us in an online meeting. The US Department of State said it did not have any further questions or comments. The Syrian interim government and the office of the EU's High Representative of Foreign Affairs and Security Policy did not reply.

3- The Syrian Revolution 2011, "[After a video circulated from inside the Russian Hmeimim Base...](#)" (in Arabic), Facebook, 12 March 2025; Journalist Waheed Yazbek, "[We told you it was not Major General Jamal Younes...](#)" (in Arabic), Facebook, 13 March 2025.

4- Samir Ahmad Nuhaili, "[Arrest of General Ghassan Ismail...](#)" (in Arabic), Facebook post, 27 January 2025.

This report draws on a wide range of sources. Publicly accessible online sources, including social media, were indispensable, primarily to prompt and direct our investigations. A small team of Open-Source Intelligence (OSINT) researchers at the Observatory of Political and Economic Networks (OPEN) collected and analyzed a mass of data in this manner, which has been especially useful in tracing the whereabouts of former regime incumbents and business elites and to establish the status of sanctioned companies. The OSINT team included **Mahmoud Alaashiq, Joanne Chlela, and Ahmad Dandashi**.

For data on business elites, their companies, networks, and links to regime incumbents during the Assad years, we relied on OPEN's database that maps tens of thousands of verified relationships among many Syrian and non-Syrian actors, including registered businesses, members of Parliament, heads of security branches, religious leaders, warlords, civil society organizations, UN agencies, business elites, militia leaders, and senior Syrian army officers. Where relevant, we also consulted OPEN's database on Lebanon. The databases are compiled from a range of data sources, including the Syrian and Lebanese Official Gazettes (*Al-Jarida Al-Rasmiyya*), official government announcements, the Damascus Stock Exchange, open-source news articles, and other sources such as the UN Procurement Database, video documentaries, and obituaries.⁵ The databases include all individuals and entities sanctioned by the EU, UK, and US. **Wael Alalwani** provided technical support in using the OPEN database.

Perhaps most instructively, we conducted many interviews in Syria, primarily but not only in Damascus, during several visits: in December 2024 and in May–June, July, and October 2025. In December 2024, and in July and October 2025, our investigations brought us briefly to Beirut.⁶ The report also draws on some interviews held earlier, before the fall of the regime. These interviews were conducted clandestinely by research assistants within Syria. Our interviewees comprised businessmen, transitional government officials, middlemen, former militiamen, journalists, human rights activists, lawyers, and former regime officials. In addition, about a dozen interviews were held online, primarily with officials of the two sanctioning states and the EU, Syrian human rights activists and researchers, Syrian businessmen residing outside Syria, and international lawyers.

5- The Syrian Official Gazette was accessed at <https://odd.syria-report.com>.

6- The German Gerda Henkel Foundation helped finance Dr. Leenders' visit to Damascus in May–June 2025 as part of its support for a research project he leads on paramilitary groups in Syria, Iraq, and Afghanistan. It also funded interviews conducted by research assistants before the fall of the regime.

1. Designating Assad's Web of Repression

Western sanctions on Assad regime individuals and associates predate the Syrian uprising of 2011. In particular, the US had already imposed sanctions on high-profile regime incumbents including late chief of Syria's Military Intelligence in Lebanon **Rustom Ghazali** and late Interior Minister **Ghazi Kana'an** in 2005, and Deputy Defense Minister and Bashar al-Assad's late brother-in-law **Assef Shawkat** in 2006. These sanctions were triggered by Syria's occupation of Lebanon and interference in its internal affairs, while the US government's frustration with the Syrian regime's role in Iraq after the 2003 overthrow of Saddam Hussein was an additional factor.

Syrian state entities were next to be targeted by US sanctions, including the **Syrian Studies and Research Centre (SSRC)** for being part of a global network of WMD proliferators. In 2006, under the USA Patriot Act—a post 9/11 congressional act to counter terrorism—sanctions were enforced against the **Commercial Bank of Syria**, the country's largest bank, for its involvement in money laundering. In 2008, the US targeted individuals and entities in Syria involved in “public corruption” and “destabilizing activities of the Syrian government,” notably sanctioning powerful businessman **Rami Makhlouf**.⁷ For its part, the EU in 2005 announced sanctions against several individuals who were suspected of involvement in the assassination of former Lebanese Prime Minister Rafiq al-Hariri, while stating its displeasure over the Syrian government's lack of cooperation with the investigation into the assassination.

The Syrian regime's violent clampdown on an initially largely peaceful uprising in 2011 prompted a dramatic expansion of individual designations, both by the EU and the US. Starting in May 2011, EU sanctions mostly targeted senior regime officials and the security apparatus who were held directly responsible for the regime's violence, reaching 211 individuals and entities by the end of 2012.⁸ The US followed suit as President Barack Obama (2009–2017) issued multiple executive orders targeting senior regime officials and prohibiting transactions with the Assad regime.

As the conflict wore on, the lists of EU- and US-sanctioned persons and entities got further populated by regime incumbents, state officials, militia leaders, and businessmen who were believed to be facilitating or supporting the Syrian regime's repression and brutality and/or to be benefiting from it. The EU's Syria-specific designations mostly followed Regulation 36/2012 but it also sanctioned Syrian persons under the broader thematic frameworks including the EU Chemical Weapons Sanctions (Council decision 1544/2018) and the EU Global Human Rights Sanctions Regime⁹

7- “[Rami Makhluf Designated for Benefiting from Syrian Corruption](#),” US Treasury Department, 21 February 2008.

8- Wael al-Alwani and Karam Shaar, “[A Comprehensive Review of the Effectiveness of US and EU Sanctions on Syria](#),” Karam Shaar Advisory LLC, 6 August 2021.

9- “[COUNCIL REGULATION \(EU\) 2025/407 of 24 February 2025, amending Regulation \(EU\) No 36/2012 concerning restrictive measures in view of the situation in Syria](#)”; “[COUNCIL DECISION \(CFSP\) 2018/1544 of 15 October 2018, concerning restrictive measures against the proliferation and use of chemical weapons](#)”; and “[COUNCIL DECISION \(CFSP\) 2020/1999 of 7 December 2020, concerning restrictive measures against serious human rights violations and abuses](#),” Official Journal of the European Union (EUR-Lex), all accessed 1 November 2025.

(Council decision 2020/1999). The US' individual listings occurred under various legal instruments, ranging from presidential executive orders to the Caesar Act of 2019 under President Donald Trump, which allowed for sanctions on any third party who engaged in transactions with the Assad regime.¹⁰ After the UK left the EU in 2020, it maintained its own sanctions regime against Damascus that mostly, but not completely, aligned with the EU's listings. By 2024, the US had designated 377 individuals and entities related to the Syrian conflict, the EU 388, and the UK 364.

Henchmen under sanctions

Going through the list of individuals and entities designated under the EU, UK, and US sanctions regimes, one finds those who carry prime responsibility for the human rights atrocities committed throughout the Assad years since the start of the uprising in 2011. They most prominently include regime incumbents up to President Bashar al-Assad himself, his wife Asma, his son Hafez, his brother Maher, and other relatives. They comprise senior officials directly implicated in the regime's repression, and state entities and their senior leadership involved in or having facilitated mass violence. Then there are senior military officers, high-ranking members of the country's notorious security and intelligence agencies (*mukhabarat*), and leaders of paramilitary forces (*shabiha*). Given the direct involvement of all these individuals and entities in the regime's intense and extensive brutality, its abuse of human rights and rights, and sheer disregard for human life, they can together be unambiguously labeled the regime's henchmen.

If one wished to be introduced to the regime's intricate universe of henchmen, General **Bassam Hassan** (pictured next page) would be the perfect guide thanks to his wide circle of friends, relatives, acquaintances, and colleagues with whom he worked to implement regime repression. Sanctioned by the EU in May 2011 and the US one year later, Hassan is not one of Assad's best known security advisors and partners-in-crime, largely because he consistently kept a low profile and never spoke in public. Yet a leaked document prepared by one of the regime's own intelligence agencies confirms his pivotal role in Assad's repressive apparatus, just as it adds detail on how intricately he was connected to the regime's many brokers of violence. The report, dated 23 June 2020 and prepared by Branch 279 of the General Intelligence Directorate (GID), one of the regime's security and intelligence agencies, documents Hassan's CV and trajectory.¹¹ His formal job was that of director of the Security and Military Office at the presidential palace and head of the "Protection Unit" for President Assad, or his motorcade. The document tells us that it was in his advisor capacity that Hassan prepared Assad's daily security briefing, for which the two men used to meet twice each day, at 9 am and at 11 am. While this already gave him rare direct access to President Assad, and thus a say in decisions on the regime's violent crackdown, Hassan's connections and leverage went far beyond this.

10- ["Commentary: The Caesar Act and a Pathway Out of Conflict in Syria,"](#) Brookings Institution, 19 June 2020.

11- "Respected Mr. Bassam Hassan" (in Arabic), a classified report prepared by the General Security Directorate, 23 June 2020.



One of his many sidekicks saw Bassam Hassan liaising between the presidential palace and the SSRC (Branch 450), as he was tasked with the logistics involving covert supplies of materials and equipment for the production of chemical weapons. The SSRC is one of the most notorious state entities responsible for having facilitated mass violence. It served as the regime's atelier, laboratory, and assembly site to produce chemical weapons, most infamously used in August 2013 against civilians in Douma and Eastern Ghouta and on many other occasions elsewhere in the country.¹² The SSRC also manufactured the equally indiscriminate and

highly lethal "barrel bombs," which regime forces for years on end dropped on civilian neighbourhoods in rebel-held parts of Aleppo and other cities.¹³ Barrel bombs caused a large number of civilian casualties, destroyed the homes and livelihoods of many others, and triggered mass displacement at an unprecedented scale. On that count, a dozen directors, managers, executives, and senior officers associated with the SSRC, its branches, and its affiliates Institutes 1000 and 2000, were put under sanctions by the US, EU, and/or UK.¹⁴ Bassam Hassan's involvement in the SSRC entailed an overall strategy to maintain the regime's chemical weapons option even after it had formally agreed to dismantle its stock in September 2013. Yet his job also involved hands-on tasks, such as making sure that Syria's customs authorities would turn a blind eye when one was needed as precarious shipments arrived from abroad.

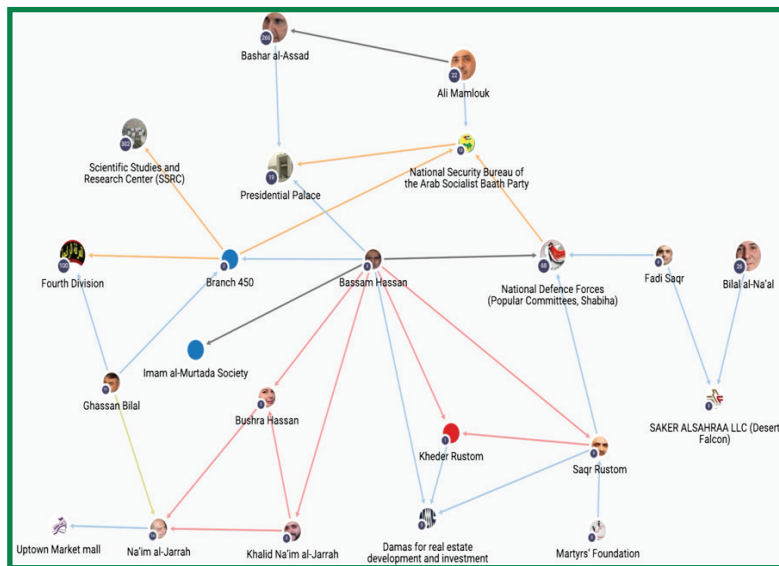
Hassan worked closely with **Ali Mamlouk**, director of the National Security Bureau (NSB) and a security chief since the late 1960s when he played a key role in setting up the feared AFID, or *al-mukhabarat al-jawiya*. The AFID was especially feared for its brutality and torture, a reputation that it thoroughly lived up to when the regime clamped down on both peaceful protestors and insurgents. Mamlouk was put under US and EU sanctions in April–May 2011. He was known to be on good terms with most officers leading the regime's competing *mukhabarat* agencies: the AFID, the GID, the Military Intelligence Directorate (MID), and the Political Security Directorate (PSD). Many of them were sanctioned for their key role in the regime's repression and brutality, including arbitrary detention, widespread torture, enforced disappearances, and executions.¹⁵

12- ["Third Report by the OPCW Investigation and Identification Team..,"](#) Organisation for the Prohibition of Chemical Weapons, 27 January 2023; ["Death by Chemicals: The Syrian Government's Widespread and Systematic Use of Chemical Weapons,"](#) Human Rights Watch, May 2017.

13- ["In Nine Years, the Syrian Regime Has Dropped Nearly 82,000 Barrel Bombs, Killing 11,087 Civilians, Including 1,821 Children,"](#) Syrian Network for Human Rights, 15 April 2021; ["Syria: Unlawful Air Attacks Terrorize Aleppo,"](#) Human Rights Watch, 24 March 2014).

14- Sanctioned SSRC senior staff and associates include: Ali Wanus, Amru Armanazi, Firas Ahmed, Ghassan Abbas, Khaled Nasri, Muhamad Bilal, Sa'id Sa'id, Samir Dabul, Tariq Yasmina, Walid Zoughaib and Yousef 'Ajeeb. The US also designated many lower-ranking staff at the SSRC.

15- The EU, UK, and/or US designated in total 49 senior members of the four mukhabarat agencies, including Jamil Hassan (AFID), Adib Nimr Salameh (AFID), Kifah Melhem (MID), Jamal Isma'il (MID), Ahmad Dib (GID), Hussam Luqa (GID), Ghaith Dalla (PSD) and Nasser al-Ali (PSD).



Bassam Hassan's network - Red = Kinship tie, Blue = Position tie, Black = Influence tie, Orange = Ownership, Affiliation, or Collaboration, Green = Shared / mutual interests

Access to Mamlouk's network provided Hassan with additional leverage in case his many assignments necessitated some of the *mukhabarat's* services. Together with Mamlouk, but also of his own accord, Hassan liaised with foreign officials, primarily Russian military officers and leading members of Iran's Revolutionary Guards Command (IRGC). According to the GID report, Hassan's frequent contacts with foreign officials included the influential intelligence boss of the United Arab Emirates

(UAE), Sheikh Tahnoun bin Zayed al-Nahyan.¹⁶ Foreign officials were keen to engage with Hassan, likely because of his wide network of henchmen, which helped them to navigate the bewildering organigram of regime power. The GID report noted that Hassan went to Hmeimim airbase every fortnight, where he met with Russia's top brass—who since September 2015 provided the Assad regime with devastating air power, military expertise, and training essential for its efforts to fight the insurgency. Hassan is also said to have been on excellent terms with IRGC officers and Iran's chief of staff in Syria.

Hassan's already busy workweek also included his role as prime coordinator of one of the main umbrella organizations established to harmonize various local paramilitary groups—the National Defence Force (NDF). Throughout the war paramilitary groups such as the NDF provided essential infantry support to the rather underwhelming regular army, manned checkpoints, and carried out massacres in civilian areas suspected of supporting insurgents. Due to their atrocities and war crimes, it comes as no surprise that the EU, UK, and US designated several paramilitary leaders.¹⁷ Hassan preferred to manage the NDF through his nephew **Saqr Rustom**, who was placed under EU and US sanctions in 2020. Hassan helped to kickstart Rustom's career with Syria's paramilitary forces by getting him a job with the Bustan Foundation, a "charitable association" financed by business tycoon Rami Makhoul, which recruited for and financed pro-regime "popular committees."¹⁸ Rustom soon served as commander of

16- Sheikh Tahnoun bin Zayed, the UAE's national security advisor, advised Russia in its military intervention in Syria, for which he regularly visited Moscow to attend high-level discussions. See, for example, [Ministry of Foreign Affairs of the Russian Federation](#), 21 November 2017. According to AFID documents leaked by the Qatari newspaper [al-Raya](#), the UAE helped finance Russia's military support to the Assad regime. The authenticity of these documents cannot be confirmed. [al-Raya](#), 9 July 2018.

17- The EU, UK, and/or US designated in total 15 pro-regime militia leaders including Saqr Rustom (NDF), Abdullah Berri (militias linked to Aleppo's Berri clan), Hilal al-Hilal (Kata'ib al-Baath), Muhamad Jabir (Desert Falcons), Muhamad Abdu Assaad (Hosn al-Watan), Nabul al-Abdallah (NDF), Simon al-Wakil (NDF) and Suheil al-Hassan (Tiger Forces / 25th Special Missions Division).

18- "[The Blacklist: Violations Committed by the Most Prominent Syrian Regime Figures and How to Bring Them to Justice](#)," Pro-Justice.org, 2019, p. 437; "[Saqr Rustom](#)" (in Arabic), SyrianMemory.org, accessed 1 November 2025.

such a popular committee in Homs, which would turn out to be a nucleus of the NDF within the governorate. In 2012 he allegedly oversaw several massacres committed in and around Homs while being involved in kidnappings and looting. His track record earned him a promotion to become secretary-general of the NDF in 2013. His protégé's rapid rise in the regime's paramilitary ranks caused Hassan's admirers to affectionately call him *khaal*, or "uncle."¹⁹

Hassan used his foreign contacts to direct weapons and cash to the NDF and its quickly expanding network of supporting organizations. An Iranian brigadier-general named Qassem Rostami turned out to be especially useful as he led the Iranian military's Support and Supply Force responsible for channeling weapons into Syria and helping to arm the country's many paramilitary groups. The GID report claims that Hassan facilitated the activities of several charities largely financed by Iran in support of families of the NDF's "martyrs" and the recruitment of new members. Rustom conveniently chaired the "Martyrs Foundation," which recruited and bankrolled salaries for both the NDF and Iranian militias. The Imam al-Murtada Society, another organization linked to Hassan, was an Iranian Shiite social organization, which proselytized through religious seminaries or *husayniyas* that also served as military training camps for new fighters. Another organization promoted by Hassan was the Euphrates Peace Association, which aided children but also organized training camps for them before joining Shiite militias. Iran was the main funder of most of these organizations and their activities. Yet the GID report alleges that Hassan, through his high-level contacts, also channeled donations from the UAE to the NDF and other pro-regime militias. The UAE's growing rapprochement with the Assad regime from 2018 onward renders this claim somewhat plausible but far from proven.

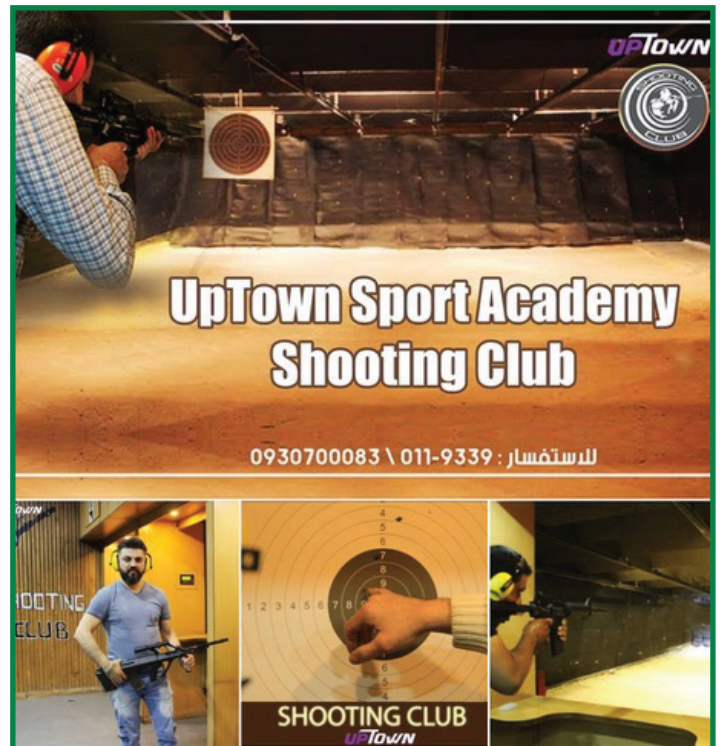
Business elites under sanctions

Like many of his henchman colleagues, Bassam Hassan built relations with and worked himself into Syria's business class, for his own benefit, to reward other henchmen for their services, and to make sure that business elites and their money served the regime's repression. As soon as the confrontation between protestors and regime forces turned into armed clashes, Syria's economy—already riddled with cronyism and corruption—transitioned into a full-fledged war economy. Whereas many Syrian businessmen left the country, many remaining entrepreneurs adapted, and new business elites emerged to cash in on the conflict, help finance the regime, and provide services to its repressive apparatus. Businessmen provided critical support to the Assad regime through various mechanisms, including funneling funds through specific institutions, using private resources to benefit the regime, and receiving preferential treatment in exchange for loyalty. In response, the EU, UK, and US subjected scores of Syrian business elites and their companies to targeted sanctions.

19- See for example the comments on a photograph of Bassam Hassan on his [personal Facebook page](#). The Facebook page seems authentic, as Hassan's daughter Bushra [tagged it on her own page](#).

Again, Hassan's circle of friends introduces us to some of the designated individuals and entities, this time those within the regime's business class. Hassan was keen not to miss the many lucrative business opportunities the war economy had to offer. The GID report describes how Hassan relied again on his nephew Saqr Rustom to scoop up opportunities, which other sources corroborate. Together with Saqr and his brother Khudr, Hassan founded the Damas Real Estate Development and Investment Company, which began to purchase land and real estate especially in Mashru' Dumar, a development project in a wealthy neighborhood of Damascus. Two former regime insiders who were close to Hassan confirmed that he and the Rustom brothers became owners of a large number of apartments and shops in that area, probably worth millions of dollars.²⁰

Dumar neighborhood has a well-known, lavish shopping mall named Uptown Market. It was co-owned by a Syrian-Palestinian businessman, **Na'im al-Jarrah**, and **Maher al-Assad**, the president's brother. The latter led the army's Fourth Division, which throughout the Syrian war earned a reputation for looting, extortion, and involvement in the production and smuggling of drugs, especially captagon. A Russian investigation reportedly concluded in 2019 that Maher al-Assad's Fourth Division together with al-Jarrah jointly operated a captagon manufacturing plant on the outskirts of Eastern Ghouta.²¹ More broadly, Syria's captagon business—with an estimated market value of USD 5.6 billion between 2020 and 2023²²—implicated regime incumbents and drug dealers, prompting another wave of sanctions, now targeting Syria's biggest traffickers including **Amer Khiti**, **Muhamad Shalish**, and **Taher al-Kayali**.



Somehow these designations omitted al-Jarrah. His Uptown Market became a favorite hangout for regime dignitaries including Deputy Foreign Minister Bashar al-Ja'afari, who did his workout at the "VIP-gym;" Bashar al-Assad's son Hafiz, who took his friends out there at a restaurant; and Foreign Minister Walid al-Mu'allim, whose relatives were said to own a luxury "sweet bakery" inside the mall.²³ The mall boasted a shooting club,

20- WhatsApp conversations with regime insiders, May 2025.

21- Salim al-Nahas, "[Maher al-Assad Is Angry!](#)" (in Arabic), Al-Modon, 4 July 2019.

22- "[Syria Economic Monitor, Spring 2024: Conflict, Crises, and the Collapse of Household Welfare](#)," World Bank, 24 May 2024.

23- "[Owned by Maher al-Assad: Jaafari and Hafez al-Assad Are Frequent Visitors to a Luxury Complex \(Photos\)](#)" (in Arabic), Syria TV, Damascus – Special, 31 December 2021; [24 Hour VIPGym](#) (official Facebook page, in Arabic), accessed 1 November 2025; Up Town Syria, "[From the opening atmosphere of \(Sweets and Bakery\)...](#)" (in Arabic),

offering training courses in firing automatic rifles (see picture on p. 17).²⁴

Hassan entered into a partnership with al-Jarrah when his daughter Bushra married the businessman's son, Khalid Na'im al-Jarrah, in September 2016. Khalid also ran his own "Uptown Café" in Dbayyeh, Lebanon.²⁵ At their glitzy wedding party held at the mall in Dumar, Bashar al-Assad is rumored to have gifted the newlyweds a Mercedes worth USD 150,000.²⁶ However, their marriage did not last long. Whether their divorce posed a setback for his business fortunes is not clear, but Hassan had other strings to his bow.

One more business venture that Hassan got involved in was through **Bilal al-Na'al**, a well-connected businessman and member of Parliament who was sanctioned by the EU in January 2024. Next to his real estate investment companies and owning Syria's largest shopping mall (**Qasioun Mall**), Na'al teamed up with **Fadi Saqr** in a business named **Desert Falcon Ltd** (also sanctioned), trading in computers, medical equipment, clothing, and food products. Fadi Saqr was the leader of the NDF in Damascus, known especially for his role in a massacre committed by his forces in al-Tadamon neighborhood in 2013.²⁷ Business thrived for Desert Falcon; it even received contracts from the UN's Children's Fund UNICEF, worth more than USD 2 million.²⁸ Given his role in overseeing the NDF, Hassan was Fadi Saqr's direct superior. Researchers of the Tadamon massacre believe that Hassan ordered Saqr to carry out the carnage, torturing and executing at least 288 civilians.²⁹

Hassan's ventures into business were no aberration. In fact, most regime officials showed much the same entrepreneurial spirit. Less inventive regime henchmen, including most *mukhabarat* officials and some militia leaders, contented themselves with abusing their power—by engaging in kidnappings for ransom, by extorting the relatives of prisoners in exchange for their release, or, more commonly, by selling information about detainees' fates that often turned out to be false.³⁰ Furthermore, assets from detainees were routinely seized, distributed among regime officials, or used to fund militias.³¹ Either way, such forms of predation blurred the distinction between the henchmen and business elites who were subjected to sanctions.

24- Up Town Syria, "[Hold your breath... focus... and shoot...](#)" (in Arabic), Facebook, 22 August 2019.

25- "[Uptown Beirut](#)," TripAdvisor.com, accessed 1 November 2025.

26- Ahed Fadel, "[Watch: A Fairytale Wedding for Assad's Security Advisor's Daughter!](#)" (in Arabic), Al-Arabiya, 17 October 2016.

27- Annsar Shahhoud and Uğur Ümit Üngör, "[How a Massacre of Nearly 300 in Syria Was Revealed](#)," New Lines Magazine, 27 April 2022.

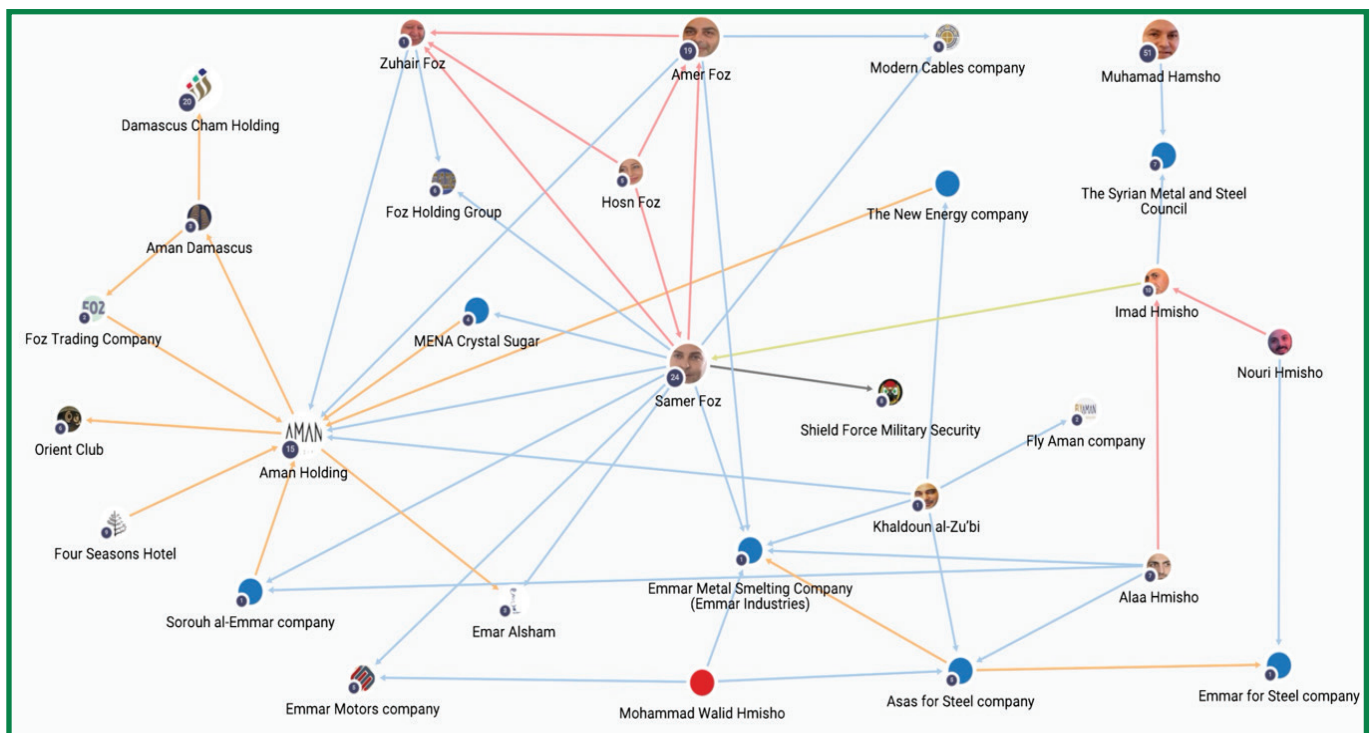
28- Syrian Legal Development Program and Observatory of Political and Economic Networks, Karam Shaar, "UN [Procurement Contracts in Syria: A 'Few' Bad Apples?](#)" (Investigation Report), 25 October 2022; Observatory of Political and Economic Networks (OPEN), "[Syrian Suppliers to the UN \(2019–2023\): A Comprehensive Map](#)" (interactive network map), accessed 1 November 2025.

29- Shahhoud and Üngör, "[How a Massacre of Nearly 300 in Syria Was Revealed](#)."

30- "[Forcibly Disappeared in Syrian Detention Centers: Research about the Details of the Process of Forced Disappearance and the Fate of the Victims](#)," Association of Detainees and the Missing in Sednaya Prison (ADMSP), December 2020.

31- "[They Took Everything: Confiscation of Detainees' Assets and Funds in Syria](#)," Association of Detainees and the Missing in Sednaya Prison (ADMSP), March 2022.

Some businessmen made a profit out of regime repression and war on a far larger scale as they established business conglomerates closely linked to regime incumbents. **Rami Makhoulf**, Bashar al-Assad's cousin on his mother's side, set a prime example for all-encompassing war profiteering, drawing on his vast network of companies and business associates—which had already monopolized entire economic sectors before 2011. Makhoulf and many of his direct relatives accumulated interests in telecommunications, financial services, transport, a private airline, real estate, construction, tourism, cement, gas and oil, trading, and retail businesses. Many of his relatives were subjected to sanctions.³² A 2022 US Department of State report estimated Rami Makhoulf's fortune at USD 5–10 billion, equal to at least one-fourth of Syria's GDP in 2019 when his wealth likely reached its peak.³³ Makhoulf operated through a web of associates, cronies and frontmen including designated businessmen **Abdul Qader Sabra**, **Adil Anwar al-Olabi**, **Muhamad Hassan Abbas**, **Ayman Jabir**, and **Samir Hassan**.



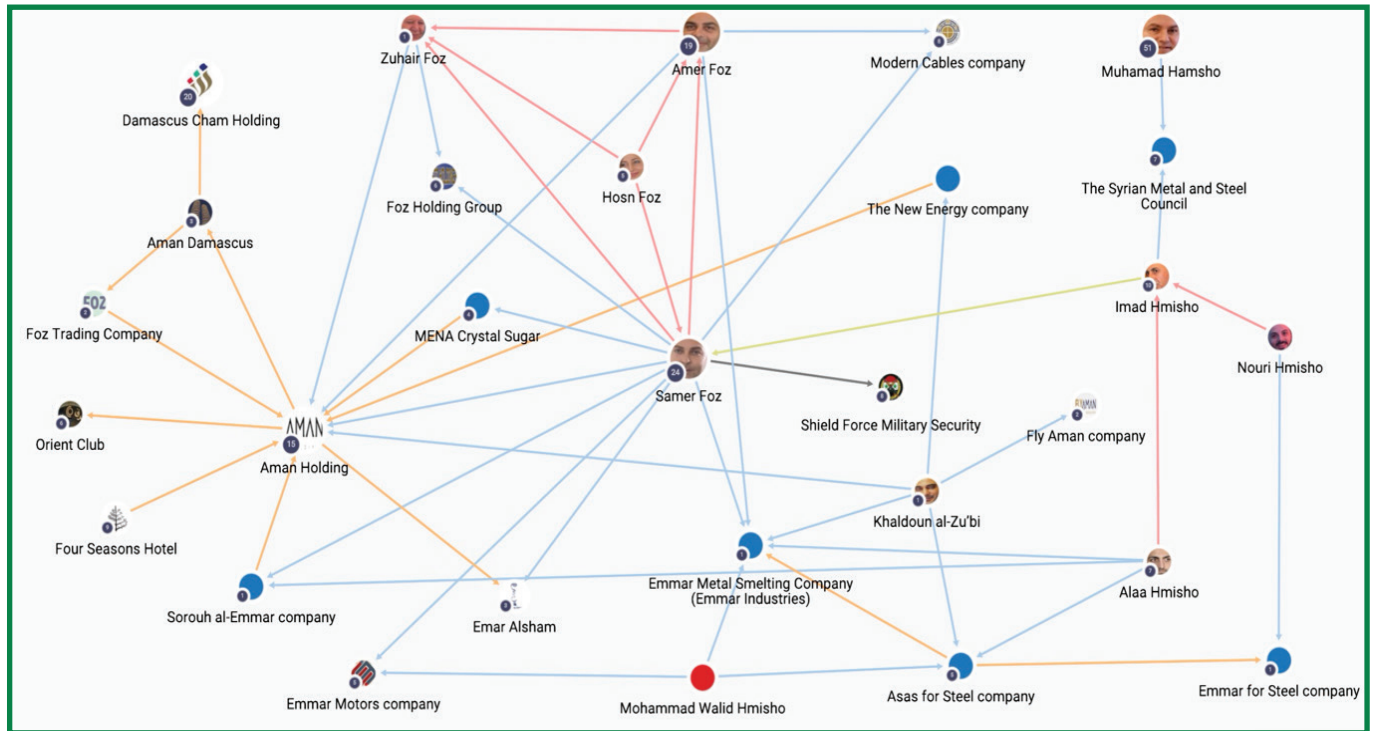
Rami Makhoulf's network: Red = Kinship tie, Blue = Position tie, Black = Influence tie, Orange = Ownership, Affiliation, or Collaboration, Green = Shared / mutual interests

Five years or so into Syria's armed conflict, several other powerful businessmen emerged next to Rami Makhoulf, only to be subjected to sanctions as well. **Samer Foz** (designated by the EU, UK, and US in 2019) was already involved in his father's company **Foz Holding Group**, established in 1988, mainly importing and exporting food products and investing in real estate. His business rapidly expanded when Foz established several large companies including **Aman Holding** (also designated), **Emmar Industries** (with **Muhamad Hamsho**, not sanctioned), **Emmar Motors**, **MENA Sugar Company**, and **Foz for Trading Company**. Through these and other companies Foz

32- Rami Makhoulf's relatives who were subjected to sanctions include: **Muhamad Makhoulf**, **Ihab Makhoulf**, **Iyad Makhoulf**, **Adib Muhanna** (US delisted in 2025) and **Ammar Medhat Sharif**.

33- "[Report to Congress on the Estimated Net Worth and Known Sources of Income of Syrian President Bashar Assad and His Family Members: Section 6507 of the National Defense Authorization Act for Fiscal Year 2022 \(P.L. 117-81\)](#)," US Department of State, captured via Internet Archive, 31 March 2025.

acquired **Orient Club**, the **Four Seasons Hotel** in Damascus, and factories producing pharmaceuticals while becoming one of Syria's main wheat traders and the sole importer of Hyundai and Kia vehicles. All of these companies were eventually subjected to sanctions. Samer Foz worked together with his brother **Amer Foz** (also designated) and partnered with other sanctioned businessmen including **Khaldoun al-Zu'bi** (vice-president of Aman Holding, board member in Qader for Investment Company and main shareholder of Fly Aman airline, together with **Bashar Muhamad Assi**).



Samer Foz's network: Red = Kinship tie; Blue = Position tie; Black = Influence tie; Orange = Ownership, Affiliation, or Collaboration; Green = Shared / mutual interests

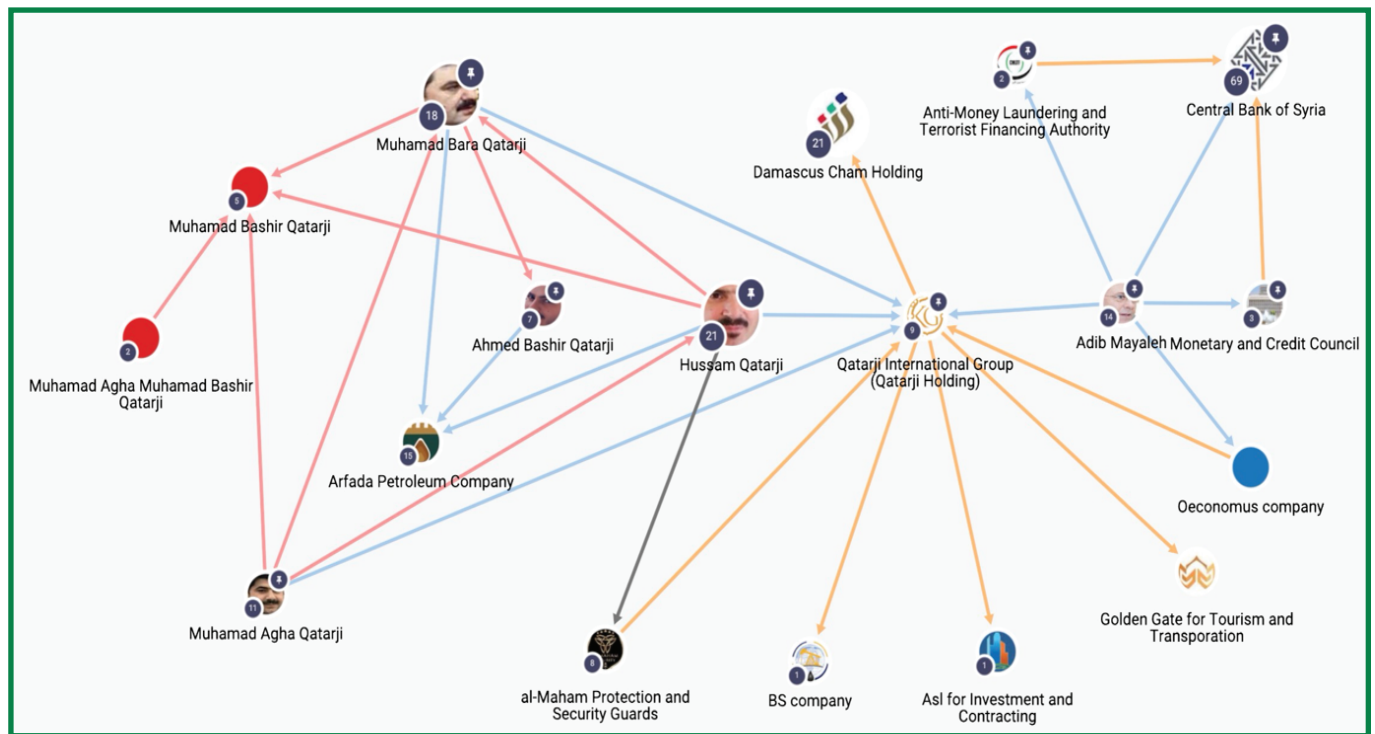
Another rising businessman in this period was **Hussam Qatarji**, subjected to US sanctions in September 2018, followed by the EU and the UK a few months later. He and



his brothers **Muhamad Bara** (and Bara's son **Abbas**) and **Muhamad Agha** (also sanctioned) built their business empire primarily through the smuggling of oil from territories controlled by the self-proclaimed Islamic State in Iraq and Syria (ISIS) and later on by the Syrian Democratic Forces (SDF), illustrating the deep connections between criminal networks and the inner circle of Bashar al-Assad.³⁴

34- "[U.S. Treasury Imposes Sanctions on Assad Regime's Key ISIS Intermediary and a Petroleum Procurement Network](#)," US Department of the Treasury, Press Release, 6 September 2018. Muhamad Bara Qatarji was killed in an Israeli airstrike in July 2024.

The Qatarjis' close ties to Maher al-Assad's Fourth Division allowed them to monopolize critical resources such as fuel and wheat, and later to get involved in the trade in captagon, generating hundreds of millions USD in revenue that financed the regime while embedding the Qatarji family within Syria's shadow state.³⁵ On the eve of the regime's collapse at the end of 2024, the Qatarjis controlled a vast conglomerate of companies including **Qatarji International Group, Golden Gate for Tourism and Transportation, Al-Asl for Investment and Contracting, Al-Maham Protection and Security Guards**, and other companies active in real estate trading, cement making, oil refinery, and media production.



Hussam Qatarji's network: Red = Kinship tie; Blue = Position tie; Black = Influence tie; Orange = Ownership, Affiliation, or Collaboration

While the Assad regime's businessmen were often rivals, they also collaborated where the scale of investments required them to cooperate and where lucrative opportunities could be shared. An example of this is the **Marota City** development project in the southeastern outskirts of Mezzeh, Damascus.³⁶ The area had first been pummeled by regime artillery to defeat insurgents and punish inhabitants suspected of supporting the opposition. Then the area was bulldozed to the ground. Showcased as the regime's policy to kickstart post-war reconstruction even when fighting was ongoing, Marota was to be the site of high-end real estate, mega entertainment venues, and shopping malls, resembling Dubai's high-rise urban development catering exclusively to the extreme rich.³⁷

35- "[Treasury Targets Syrian Conglomerate Funding Oods Force and Houthis](#)," US Department of the Treasury, Press Release, 14 November 2024; Michael Georgy and Maha El Dahan, "[How a Businessman Struck a Deal with Islamic State to Help Assad Feed Syrians](#)," Reuters, 11 October 2017.

36- Tom Rollins, "[Decree 66: The Blueprint for al-Assad's Reconstruction of Syria?](#)" The New Humanitarian, 20 April 2017; Mahmoud Al-Lababidi, "Damascus Businessmen: The Phantoms of Marota City," Middle East Directions (MED), European University Institute (EUI), April 2019 (abstract page); Edwar Hanna and Nour Harastani, "[Is Marota City the Type of Reconstruction Syrians Need?](#)" The Aleppo Project, May 2019.

37- "[Home Page](#)," Marota City (official website, English version), accessed 1 November 2025.

To this end, **Damascus Cham Holding Company** was established, under the auspices of the governor of Damascus, **Bishr al-Saban**. It comprised some of Syria's richest businessmen and their companies, including Rami Makhlouf (via **Rawafed Damascus Company**), the Qatarjis (via Qatarji Holding Group), Samer Foz (via Aman Damascus company), Bilal al-Na'al, **Mazen Tarzi** (via **al-Nama Trading and Contracting company**) and **Anas Talas** (via **Mirza company**). Most of these businessmen and their companies were placed under Western sanctions. Especially for those businessmen involved in the captagon trade, the Marota project presented itself as an ideal platform to launder their money. Through their connections with key regime incumbents, henchmen including Maher al-Assad and Bassam Hassan are likely to have effectively positioned themselves to benefit from the expected windfall of profits as efforts were made to attract investors from the Gulf.



The 150,000 or so original property owners in the area, on the other hand, lost out significantly as they were denied fitting compensation. Many of the displaced original owners failed to get any reparations due to a prohibitive deadline of one month to settle their status. Others were faced with unaffordable fees charged in procedures formally designed to grant them alternative housing. Still others were kicked out of their houses by force.³⁸ Many of those who did manage to get some compensation in the form of shares in Damascus Cham Holding Company were forced to sell their rights against prices far below market value.

As the regime drew on the country's business class as a resource for clientelist control, it extracted revenues from it to finance the war effort and for henchmen to enrich themselves. Against this background, entrepreneurs often faced coercive and unpredictable treatment—whether through official government measures, informal taxation, or the proverbial knock on the door from powerful regime figures. Senior regime henchmen did not shy away from using force and threats to remind business elites of who was in charge. However, most prominent businessmen had clear agency in how they maneuvered in the regime's repressive environment while profiting handsomely. To persuade regime incumbents to continue granting them privileges and to buy protection, businessmen actively financed pro-regime militias or supported them by other means.³⁹

38- [“The Regime Begins Demolishing Civilian Homes in Damascus by Force, Throwing Residents’ Belongings into the Streets”](#) (in Arabic), Al-Souria.net, 28 August 2015, captured via Internet Archive, 24 October 2017.

39- [“Funding War Crimes: Syrian Businessmen Who Kept Assad Going,”](#) Pro-Justice, 2000, p. 83.

For example, Samer Foz financed the Shield Force Military Security militia (*Quwwat Dir'a al-Aman al-'Askari*). **Faris al-Shehabi**, a prominent businessman in Aleppo, financed and mobilized more than 5,000 militiamen.⁴⁰ In 2017, Shehabi boasted about his donation of remote-controlled military vehicles to the Syrian armed forces.⁴¹ Businessman Anas Talas supplied the regime's armed forces and militias with handouts of canned food.⁴² A method favored by prominent businessmen to demonstrate their allegiance to the regime was to set up "charities" that channeled money and support to pro-regime militias and the regular armed forces. Rami Makhoul's **al-Bustan charity** was the best-known example, but others followed suit, including the Qatarji family and **Sami Obari** (a prominent businessman who headed the NDF in Aleppo) who also ran charities supporting militias, both members and their families.⁴³ Makhoul's Bustan charity received contracts from UN humanitarian agencies.⁴⁴

Some businessmen personally led militias into widespread practices of looting (*ta'fish*) and extortion while deploying them to protect their own smuggling routes. Examples include **Hassan Sha'ban Berri** (who financed and led the Zein al-Abdin Brigade) and the brothers **Ayman and Muhamad Jabir** (who financed and led the Desert Hawks and Maghawer al-Bahr militias).⁴⁵ Other militia leaders transformed themselves into businessmen as they were rewarded for their services or when they simply seized the opportunities the war economy offered them. These included **Muhamad al-Sa'id** (the leader of the Palestinian-Syrian pro-regime militia Liwa' al-Quds who joined the country's scrap metals tycoons),⁴⁶ **Suhayl al-Hassan** (the leader of the Tiger Forces

40- "[Profile of Fares al-Shehabi](#)" (in Arabic), Pro-Justice.org, accessed 1 November 2025; Syrian Press Agency, "[Watch journalist Milad al-Shehabi: Fares al-Shehabi and others like him must be held accountable...](#)" (in Arabic), video 4:00, Facebook, 6 December 2024; "[The Drug War Ignites Between Iranian Militias and the National Defence Forces in Aleppo](#)" (in Arabic), Farah News Online, 28 July 2019; Interviews with businessmen in Aleppo, July and August 2024.

41- Shehabi described his gift as "the least we can offer to our city [Aleppo], our homeland, and our army. This is how Aleppo avenges what was done to it, and how Syria avenges its martyrs." — "[Negotiations Committee Denies Baladi News that There Is Any Agreement with the Assad Regime](#)" (in Arabic), Baladi News, 28 September 2017.

42- "[Profile of Muhamad Anas Tallas](#)," Pro-Justice.org (in Arabic), accessed 1 November 2025.

43- Ziad Awad, "[Non-Governmental Organisations in Aleppo: Under Regime Control and at Its Service](#)," Middle East Directions, European University Institute (EUI), Wartime and Post-Conflict in Syria Research Project Report, Issue 2022/09, 3 June 2022; Joseph Daher, "[Assad Regime Still Reliant on Fractions of the Sunni Bourgeoisie](#)," Syria Untold, 21 December 2017; "[Al-Foz Charity](#)," Syria Report, 22 October 2021 (subscriber-only content)/; Mike Swedeh, "[Exclusive Interview: CEO of Foz Holding, Samer Foz](#)," Arabisk London Magazine, 5 June 2017.; Interview with a militia member in Aleppo, June 2022. Sami Obari was not put under sanctions. Upon his return to Syria from Lebanon he was arrested by transitional government security forces on 1 December 2025 on charges of crimes committed at checkpoints, including the arrest of civilians and handing them over to intelligence agencies, and involvement in looting. — Syrian Ministry of Interior, "[The commander of internal security in Aleppo Governorate, Colonel Mohammad Abd al-Ghani: Based on accurate intelligence information...](#)" (in Arabic), Facebook post, 1 December 2025.

44- Nick Hopkins and Emma Beals, "[UN Pays Tens of Millions to Assad Regime under Syria Aid Programme](#)," The Guardian, 29 August 2016.

45- "[Funding War Crimes: Syrian Businessmen Who Kept Assad Going](#)," p. 73.

46- "[The Engineer Khamis Affirms the State's Commitment to Supporting the Iron Industry and Removing Obstacles to Restarting Idle Factories](#)" (in Arabic), SANA, 12 February 2019. Muhamad al-Sa'id also had long-standing ties to Hussam Qatarji. He was not sanctioned. See also Yussef Fakhr al-Din and Hummam al-Khatib, Legal Review by Anwar al-Bunni, "[The Killer Integration: The General Command Organization and the Al-Quds Brigade](#)" (in Arabic), Syrian Center for Legal Studies and Research (SCLSR) and Democratic Republic Studies Center (DRSC), 21 March 2019, pp. 72, 90; Abdullah al-Khateeb, Tom Rollins, and Abdelrahman Shaheen, "[A New Palestinian Community? Syria's Uprising and Conflict from the Perspective of the Palestinian Camps](#)," Rosa Luxemburg Stiftung, May 2020, p. 27.

militia, later incorporated into the regular armed forces as the 25th Special Tasks Division),⁴⁷ and NDF leaders Fadi Saqr and Saqr Rustom. Another example is **Khodr Ali Abu Taher**, a militia leader with strong links to the Fourth Division who first enriched himself through levying duties at checkpoints. Backed by Maher al-Assad, he quickly gained large stakes in the oil importing business, hotels, and media companies, and he established a retail business for cell phones and electronics, **EMMA TEL**, and a private security company, **Al-Qal'a for Protection, Guarding and Security Services**.⁴⁸ In short, in Syria's war economy, obedience to powerful regime figures, support for their violence, and personal greed merged to the point that success in business was dictated by all these factors combined. Involuntary submission to the regime alone would not suffice to make profits or ensure survival.

Businessmen provided vital services to the regime by circumventing sanctions and/or facilitating its criminal activities. The Qatarji family helped organize oil and fuel supplies for the regime's armed forces through **BS Company**, based in Beirut and sanctioned by the US in June 2019 for being one of the largest importers of crude oil from Iran to Syria.⁴⁹ Syrian entrepreneur **Mahmoud Abdulilah al-Dj** was linked to drug smuggling. He acted as a sole agent in Libya for **Cham Wings**, a private airline linked to Rami Makhlouf that was already sanctioned by the US and the EU for money laundering, arms trafficking, and transporting mercenaries.⁵⁰ Al-Dj also collaborated with Greece-registered **Air Mediterranean** that began to operate flights to and from Damascus in June 2023, raising concerns that this airline may also have been involved in illicit trade practices.⁵¹ Many other foreign companies played their part in supporting the regime, such as **Pangates International**, a UAE-based company owned by **Wa'il and Adnan Abdul Karim**, which was involved in smuggling jet fuel to Syria and designated by the US and the EU in 2014.⁵² **MHD Nazier Houranieh & Sons Company**, owned and mainly run from Beirut by Canadian-Syrian nationals **Muhamad Nazir and Chadi Houranieh**, was accused of supplying the SSRC with materials used in the production of chemical weapons.⁵³ These and other companies drew on their international networks to throw the regime a lifeline, helped prolong its survival through violence

47- Interview with a former Tiger Forces fighter, Latakia, 28 September 2023; Shadi al-Ahmad, "[Who Is Tarnishing Suhail al-Hassan's Reputation?](#)" (in Arabic), AL-Modon, 23 April 2019.

48- "[Funding War Crimes: Syrian Businessmen Who Kept Assad Going](#)," p. 127-130; "[Militia Leader Calls It a 'Cheap Stunt' — How Did Abu Ali Khodr Respond to Reports of His Escape?](#)" (in Arabic), Shaam Network, 16 April 2022.

49- US Department of the Treasury, "[Treasury Designates Syrian Oligarch Samer Foz and His Luxury Reconstruction Business Empire](#)," Press Release, 11 June 2019. In 2025, BS Company posted on its [Facebook page](#) Ramadan greetings and other posts from Qatarji Holding Group, leaving no doubt about its affiliation with the Qatarjis.

50- US Department of the Treasury, "[Treasury Sanctions Additional Individuals and Entities in Response to Continuing Violence in Syria](#)," Press Release (Archived Content), 23 December 2016.

51- Karam Shaar, Mohamad Orwani, Traci Lawrence, Baraa Khurfan, Muhsen al-Mustafa, and Wael al-Alwani, "[How a Drug Kingpin Is Running Flights from Damascus to the Rest of the World](#)," Observatory of Political and Economic Networks (OPEN), 8 September 2023. Air Mediterranean was not sanctioned.

52- US Department of the Treasury, "[Treasury Sanctions Companies for Aiding the Syrian Regime](#)," Press Release (Archived Content), 9 July 2014.

53- Council of the European Union, "[Chemical Weapons: EU Imposes Further Restrictive Measures on Ten Individuals and One Entity](#)," Press Release 949/22, 14 November 2022.; Stewart Bell, "[Syria: Canadian Owners of Houranieh & Sons Sanctioned by EU for Allegedly Supplying Assad's Chemical Weapons; Includes Company Comments](#)," Business & Human Rights Resource Centre, 15 June 2023.

and repression, and seized on the mass-scale suffering caused by the armed conflict as a business opportunity. All these companies, and/or many of their executives and owners, were placed under Western sanctions.

The regime's management of business elites involved constant maneuvering, as some businessmen fell out of favor while others took their place when shifting power constellations within the inner circle disrupted those reliant on political backing to run their companies. Accordingly, many businessmen eventually fell from grace, lost their privileges, received hefty tax bills, or even faced prosecution—among them Muhamad Hamsho, the Jabir brothers, Khodr Ali Abu Taher, and Faris al-Shehabi. This did not make them innocuous victims, let alone principled opponents of the regime. It merely underscored that the privileges they had enjoyed through their complicity with the regime were temporary—and that they had exploited those privileges to the fullest while they lasted.

A dramatic shakeup of Syria's business class started around 2019–2020 when Rami Makhlouf was sidelined in a rowdy confrontation with President Bashar al-Assad and his close circle of confidants. The latter increasingly featured his wife Asma, whose business ambitions clearly clashed with the vested interests of the country's tycoons. Makhlouf lost many of his companies and assets, including his flagship company **Syriatel**. His Bustan association and other charities were placed under the control of Bassam Hassan—as always, offering President Assad a safe pair of hands.⁵⁴ The shakeup coincided with measures taken to demobilize or dismantle key pro-regime militias, mainly in the regime's strongholds of Latakia and Jabla, which no longer appeared to be needed as the regime hoped to consolidate its military gains in the conflict.⁵⁵ At the same time, the regime was in dire financial straits, prompting it to demand a larger piece of the cake at the expense of some of the businessmen and militia leaders who helped it to survive. Centralizing, concentrating, and retaking control of business opportunities and wealth became the regime's new imperative.

The presidential couple tasked a hitherto unknown businessman, **Yassar Ibrahim**, with the job of retaking control of the country's most lucrative businesses. He chaired the newly established Economic Council, variably called the "Secret Office" or the "Financial and Economic Office," at the presidential palace while answering to the First Lady. Within a few years' time, and through establishing a dense network of fronts and partnerships, Ibrahim had taken control of a myriad of key companies, portentously called "The Group." It comprised more than a hundred companies in key economic sectors including telecoms, banking, real estate, pharmaceuticals, agriculture, transportation, and energy. A former financial director of The Group estimated the total value of its core operations at USD 900 million.⁵⁶ It also imposed partnerships onto

54- "Respected Mr. Bassam Hassan" (in Arabic), classified report prepared by the General Security Directorate, 23 June 2020.; Shadi al-Ahmad, "[Latakia: Power Struggle Within the Ruling Family Hits the Syrian Social Nationalist Party](#)" (in Arabic), Al-Modon, 6 September 2019.

55- "[Shabiha Militias in Latakia Attack Assad: Who Are They, and What Are the Main Points of Dispute?](#)" (in Arabic), Orient News, 8 September 2019.

56- Timour Azhari and Feras Dalatey, "[Syria Is Secretly Reshaping Its Economy. The President's Brother Is in Charge](#)," Reuters, 24 July 2025, updated 6 August 2025.

other tycoons, including Samer Foz, the Qatarjis, and Muhamad Hamsho, allowing it to control up to an estimated 30 percent of Syria's GDP by 2024.⁵⁷

Unlike during the earlier years of the war, the Assads preferred to work through fronts (informal nominee owners or shareholders) instead of cronies (genuine if regime-dependent businessmen).⁵⁸ Often this was done simply by registering shares and proprietorship in the names of ordinary citizens, who signed paperwork at Yassar Ibrahim's office to ensure they would not be entitled to real ownership or be able to make any claims.⁵⁹ In October 2021, Syria's Economy Minister **Muhamad Samer al-Khalil** reportedly said that "evading sanctions has become a Syrian craft" and he called on investors to "not appear under their true names in the local market."⁶⁰ The Group fully heeded his advice. One of its companies, **Sawari Tourism Investments**, was on paper owned by Ramez Ali Zioud (Yassar Ibrahim's driver) and Ali Najib Ibrahim (the driver of **Ahmad Khalil**, The Group's treasurer).⁶¹ Razan Humayra, a cleaning lady at Ibrahim's office, discovered during the application process for electronic food vouchers that she was listed as holding five percent of Syriatel's shares—a fact revealed when her request was denied due to those nominal assets.⁶² Among the many companies linked to Yassar Ibrahim, his relatives, and the Group were **Al-Sayyad for Guarding and Protection Services** (linked to the Russian Wagner group), three telecom companies (Syriatel, **MTN Group**, and **Wafa Telecom**), e-payment company **Blink Electronic Payment Services**, **Al-Rafed Trading and Investment**, and construction company **ARCS Private**.⁶³ Yassar Ibrahim was placed under sanctions by the US in August 2020, followed by the UK in March 2021 and the EU in July 2022.

57- Azhari and Dalatey, "[Syria Is Secretly Reshaping Its Economy. The President's Brother Is in Charge.](#)"

58- As Shaar and Heydemann put it: "[C]ronies provide political and economic support in exchange for the preferential treatment they receive from state institutions, enriching themselves in the process, business fronts have nothing to offer in exchange for the privileged positions they occupy. Their mere existence as "businessmen" rests on one factor alone: Assad's approval." Karam Shaar and Steven Heydemann, "[Networked Authoritarianism and Economic Resilience in Syria](#)," Brookings Institution, 26 August 2024.

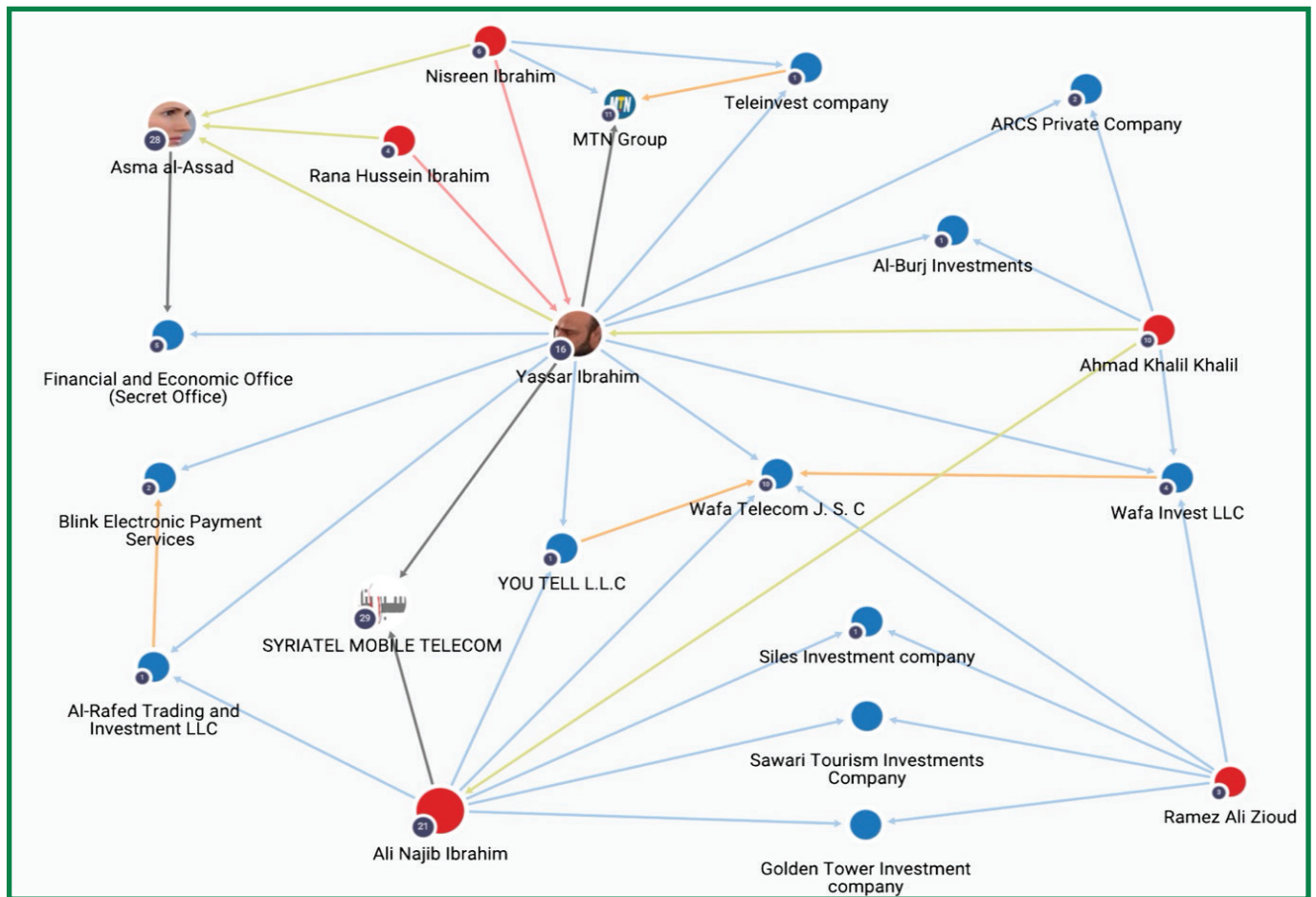
59- Interview with an accountant formerly employed by regime-linked companies, Damascus, May 2025.

60- Yasin Abu Fadil, "[By Name: Shell Companies Used to Evade Western Sanctions on Assad — Economic Researcher Issues Warning!](#)" (in Arabic), Orient News, 4 February 2022.

61- Feras Dalatey Sr., "[A Questioning Note — Not an Accusation — About the Announced Jonada Resort Investment](#)" (in Arabic), Facebook post, 23 August 2023.

62- Interview with former accountants, Damascus, May and July 2025 (Zoom and in person).; Enab Baladi, "[Syria: Changes in the Board of Directors of Syriatel](#)" (in Arabic), Enab Baladi, 8 October 2024.

63- See also: "[Profile: Yassar Hussein Ibrahim](#)," The Syria Report (paywalled), 25 October 2022.



Yassar Ibrahim's network: Red = Kinship tie; Blue = Position tie; Black = Influence tie; Orange = Ownership, Affiliation, or Collaboration; Green = Shared / mutual interests

Bureaucrats and state officials under sanctions

Also placed under sanctions were bureaucrats and state officials who were not necessarily directly involved in mass violence or complicit with coercive agencies, but whose positions could be considered as generally in support of the regime and its repressive policies. These included many ministers and government members routinely designated by sanctioning states not based on their individual actions, but because sanctioning them was believed to signal disapproval of the Assad regime's repressive policies in general and to exert pressure for a change in its behavior.⁶⁴ These individuals oversaw portfolios that were not intrinsically or immediately linked to mass violence or facilitating repression as such, and included ministers of state, ministers of social affairs, culture, and education, regional governors, and other state officials.⁶⁵

Furthermore, as the regime's henchmen predominated authoritarian governance generally, such state officials typically were bestowed with very limited powers, effectively turning them into second-tier regime members. Importantly, however, in some cases seemingly innocuous, "technocratic," or administrative roles did not

64- Interview with an EU official, February 2025.

65- Ministers, ministers of state, and advisors whose portfolios were directly linked to repression—including defending the regime against opposition activists, obstructing international measures to curb its violence, or publicly justifying that violence—were categorized as "henchmen."

preclude individual responsibility for actions that directly contributed to or enabled regime violence.

Adib Mayaleh served as governor of the **Central Bank** between 2004 and 2016. The Assad regime then appointed him Minister of Economy and Foreign Trade for one year. He was sanctioned by the US and the EU in 2012. While Mayaleh's role could partly be described as that of a technocrat, his actions went far beyond what would normally be expected from a central bank governor. His resumé gives insights into how some sanctioned individuals, dressed in the grey suits of civil servants, provided key services to the regime, its henchmen, and business elites, while benefiting abundantly.

In the early 2000s Mayaleh proved himself useful to senior regime incumbents as a financial advisor to **Muhamad al-Khouli**, a senior *mukhabarat* boss and founder of the AFID, who like many of peers had gone into business.⁶⁶ Rami Makhoul spotted Mayaleh's talents and got him appointed as Central Bank governor.⁶⁷ Returning the favor, Mayalah reportedly withdrew parts of the Central Bank's foreign currency reserves and sold them to money-trader **Zuheir Sahloul**, one of Makhoul's agents, who was given an office within the Central Bank.⁶⁸ Mayaleh also was alleged to have provided loans to regime-linked businessmen, on extremely favorable terms or without securing any collateral, or he instructed state-owned banks to do so.⁶⁹

In 2013 Mayaleh was accused of accepting bribes in an indictment filed by Austrian prosecutors. The latter charged nine individuals, including Mayaleh and the deputy governor of the Austrian Central Bank, with criminal conspiracy in money printing contracts between 2005 and 2011 that deliberately inflated the value of the Syrian pound by 14 percent, thereby allowing the difference to be shared in bribes.⁷⁰ Mayaleh denied the accusations, and no one was convicted.

In 2020 Mayaleh was mentioned in an investigation into how, throughout the war years, the Assads moved their money to Moscow to invest in high-end real estate and other deals benefiting the Syrian regime through Russia.⁷¹ The regime used a Russian bank, Tempbank, to facilitate sanctions-evading oil exports to Syria and even the smuggling

66- [“Assad Sacks Mayaleh, Long-Time Regime Servant,”](#) The Syria Report (subscriber-only content), 4 April 2017.

67- [“Assad Sacks Mayaleh, Long-Time Regime Servant,”](#); “Funding War Crimes,” p. 53.

68- [“Funding War Crimes,”](#) p. 53; [“Two Syrians Deny Managing Assad’s Wealth as Stated by WikiLeaks,”](#) Al Arabiya English, 10 April 2013, updated 11 April 2013. In a leaked US embassy document, Sahloul was described as a leading figure in black-market currency trading and as being in charge of managing President Assad’s money; he denied the charges. Sahloul’s money-exchange company, operating from Türkiye, was placed under US sanctions in November 2019 for its financial transactions benefiting ISIS. [“Treasury Designates ISIS Financial, Procurement, and Recruitment Networks in the Middle East and South Asia,”](#) US Department of the Treasury, Press Release, 18 November 2019.

69- See also: Aleppo Youth and Girls Gathering News Network, [“A Scandal of the Highest Order — Will Anyone Be Held Accountable?”](#) (in Arabic), Facebook post, 18 May 2017. These allegations, while plausible, have never been proven conclusively.

70- Kit Chellel and Alexander Weber, [“Bribery Plot in Austria Lands Money Printers in Dock,”](#) Bloomberg (subscriber-only content), 27 October 2014; [“Mayaleh Accused of Receiving Kickbacks from Austrian Central Bank — Report,”](#) The Syria Report (subscriber-only content), 17 June 2013.

71- Global Witness, [“Assad’s Money Men in Moscow,”](#) Briefing, 13 July 2020.

of raw materials and equipment for Syria's chemical weapons and ballistic missile programs with support of Russia's intelligence service. According to the bank's CEO, Mikhail Gagloev, Mayaleh had a strong relationship with one of Tempbank's main shareholders, **Moudalal Khoury**, a Syrian businessman holding Russian citizenship. The Russian bank helped the Central Bank to shore up its foreign currency reserves. It is not proven whether Mayaleh had a hand in all of Tempbank's or Khoury's illicit transactions with the Syrian regime.

Yet according to Gagloev, Mayaleh visited Moscow regularly and acted as an intermediary between, on the one hand, Khoury and **Muhamad Makhoul** (a sanctioned businessman and Rami Makhoul's father), and on the other, Makhoul's sons Hafez and Rami, in purchasing high-end real estate in Moscow and running front companies on behalf of them. Tempbank, Mudalal Khoury, and a number of Khoury's relatives including his brother **Atiya** were placed under US sanctions in 2014, 2015, and 2016, respectively, for their dealings with the equally sanctioned Syrian Central Bank, for facilitating oil and jet fuel exports to Syria, for dealings with the SSRC, and for providing financial services to sanctioned regime incumbents including the Makhouls. The US Treasury Department's Office of Foreign Assets Control (OFAC) specifically mentioned Atiya Khoury's **Moneta Transfer & Exchange company** for facilitating cash payments on behalf of Mayaleh.⁷²

As by the end of 2017 Rami Makhoul's influence within the regime had begun to wane, Mayaleh lost his political backing. This likely contributed to Mayaleh's dismissal as Central Bank governor and then his appointment as Minister of the Economy and Foreign Trade to be cut short to a one-year stint. However, Mayaleh quickly adjusted to the shifting power constellations in Damascus by establishing ties with Hussam Qatarji. His knowledge of Makhoul's business empire turned out to be useful now that it was to be dismantled to the benefit of other businessmen, including Qatarji. Through Qatarji Holding Group, the latter built and financed an office building for Mayaleh's newly established company **Oeconomus** (not sanctioned) at al-Amir Izz al-Din Street near Rawda Square in Damascus.⁷³ Describing itself as an auditing and accountancy firm, the company was registered in November 2019 with Mayaleh as its sole owner and director. However, one of Mayaleh's close relatives, **Boutros Mayaleh** (not sanctioned), was involved as well. A year earlier, Boutros had set up his own auditing firm, **HLB Fiducia**, presenting itself as a member of a UK-based global network of accountants, HLB International.⁷⁴



72- US Department of the Treasury, "[Treasury Sanctions Networks Providing Support to the Government of Syria](#)."

73- Interview with an accountant, Damascus, May 2025.

74- HLB The Global Advisory and Accounting Network, "[Syria](#)," accessed 1 November 2025. While Boutros Mayaleh uses the HLB brand, HLB International emphasizes on its website that it "is a global network of independent advisory and accounting firms, each of which is a separate and independent legal entity and as such has no liability for the acts and omissions of any other member." HLB The Global Advisory and Accounting Network, "[Damascus](#)," accessed 1 November 2025.

The Mayalehs appear to have used the two firm names interchangeably, ostensibly to conceal the activities of Adib, who was still placed under Western sanctions.

The two companies' offices are only 140 meters apart.⁷⁵

A number of Adib's protégées and former staff at the Central Bank identified themselves as consecutively having worked for both companies.⁷⁶

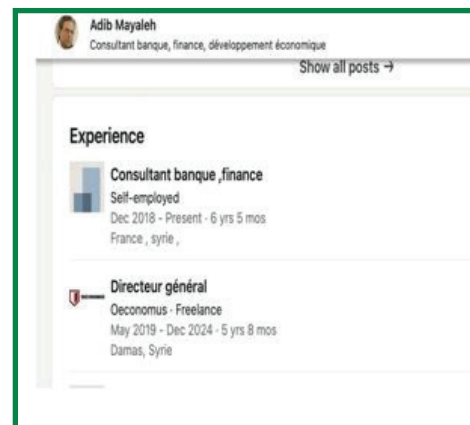
Conflating the two companies, one of these employees, **Batoul Rida**,

posted to Facebook on 3 June 2021 friends a photo of what she described as "my lovely team," showing

herself with colleagues and Adib Mayaleh at the office of Oeconomus.⁷⁷

In her Facebook profile Rida states that she is "an operating partner" at HLB Fiducia.⁷⁸

Oeconomus/HLB Fiducia became Hussam Qatarji's chief accounting agency just as it acted as the human resources department of his Holding Group.



We spoke to a former employee who showed us an email sent to him by Oeconomus in 2021 regarding a vacancy at Qatarji Holding Group following a job interview held with representatives of Oeconomus shortly before. Other sources confirmed that Adib

Mayaleh, through his company and/or that of Boutros Mayaleh, became Qatarji's main accountant, auditor, and fixer.⁷⁹

Among Oeconomus' clients they mentioned BS

Company, the sanctioned company the Qatarjis used to import oil from Iran.⁸⁰

Furthermore, Adib was reported to have been appointed as CEO of Qatarji Holding

Group in 2020, with several pro-regime websites congratulating him on his new job.⁸¹

Whether he was appointed to that position or not he unsuccessfully tried to establish

a new bank controlled by Hussam Qatarji and get it licensed.⁸²

75- Google Maps, "[Oeconomus and HLB Fiducia & Boutros Mayaleh – Proximity View \(2-Minute Walk\)](#)," accessed 1 November 2025.

76- See also "[Abbas Hanaa](#)," LinkedIn, accessed 1 November 2025. Abbas Hanaa lists himself as "Business Advisory Manager" with HLB Fiducia and formerly with Oeconomus; Syrian Authority for Financial Auditing and Accounting Professions (SAFAP), "[Curriculum Vitae: Abbas Hanaa](#)," PDF, accessed 1 November 2025 (link may be inaccessible outside Syria) Yazan Hosari, a "partner" at HLB fiducia, also worked for Oeconomus. "[Yazan Hosari](#)," LinkedIn, accessed 1 November 2025; Interview with one of Qatarji's former accountants, May 2025.

77- Batoul Rida was sanctioned by the US in March 2015, accused of having been involved in Mayaleh's dealings with Tempbank in Moscow and in fuel purchases via the Central Bank.— US Department of the Treasury, "[Treasury Targets Syrian Regime Financial and Weapons Networks](#)" (archived content), Press Releases, 31 March 2015.— She was delisted in 2025.

78- [Batoul Rida](#), Facebook profile page, accessed 1 November 2025.— Her chronological list of employers does not mention Oeconomus.

79- Interviews with accountants, May–June 2025.

80- Interviews with accountants, May–June 2025.

81- "[Dr. Adib Mayaleh Assumes His Duties as Director General of the Qatirji International Group](#)" (in Arabic), Al-Massa Al-Souria Facebook page, 24 January 2022; Muhamad Wissam, "[Adib Mayaleh Alongside the Qatirji Family: What Is the Connection with 'Caesar' and 'ISIS'?](#)" (in Arabic), 7al.net, 26 January 2022; Sahibat al-Jalala – al-Ihtiyatya, "[Adib Mayaleh, Former Central Bank Governor, Appointed Director of a Well-Known Businessman's Company!!!!](#)" (in Arabic), Facebook post, 24 January 2022. See also: Syria TV – Exclusive, "[Adib Mayaleh: Corruption Before the Syrian Uprising and a Collapsed Economy After It](#)" (in Arabic), Syria TV, 6 June 2024; Musab al-Mujbil, "[Adib Mayaleh: The Custodian of 'Assad's Treasury' Turns to Managing Suspicious Investments for the Regime's Benefit](#)" (in Arabic), Al-Estiklal Newspaper, 2021.— Qatarji Holding Group made no public statement on Mayaleh's appointment. A well-informed confirmed that Mayaleh at least for one year served as Qatarji's CEO.— Interviews with former regime broker and businessman, June 2025.

82- Interview with one of Qatarji's former company managers, May–June 2025.

This time around the meteoric rise of Yassar Ibrahim seems to have cut short Qatarji's plans to expand his business further, just as it dashed Mayaleh's fortunes. Mayaleh—holding French citizenship—left for France, where he settled under his French name “André Mayard” and joined his wife and daughter in owning and running a real estate agency.⁸³ The French authorities apparently decided that, despite EU sanctions calling for his assets to be frozen, the earnings from his real estate agency should be allowed under the EU provision that such funds “may be made available by member states for personal needs.”⁸⁴ Occasionally, Mayaleh gave interviews in which he railed against Western sanctions on Syria, blaming them for the dramatic depreciation of the Syrian pound rather than his own policies while serving as governor of the Central Bank.⁸⁵ But he also continued to breach the EU sanctions imposed on himself and Qatarji from his home in France. Oeconomus/HLB Fiducia in Syria kept providing services to Qatarji when Mayaleh, according to his own LinkedIn page, acted as Oeconomus' general director between May 2019 and December 2024.⁸⁶

At first sight one would not think that provincial governors would have much of a role to play in regime repression and violence. Indeed, provincial governors in a heavily centralized authoritarian regime like Syria's mostly had little clout and were not given great responsibility. When they were put under Western sanctions it was primarily for being part of the government rather than for their individual actions. However, when the conflict started in 2011 and rapidly escalated into violent repression and armed confrontations, governors routinely became members of so-called “security committees”—comprised of Ba'ath party bosses, *mukhabarat* chiefs, policemen, and high-ranking officers of the armed forces—and reported back to the Central Crisis Management Cell in Damascus.⁸⁷ Especially in the first few years, these security committees oversaw and implemented the regime's clampdown on protests, coordinated intelligence gathering on opponents, and orchestrated arrests.

Governors were arguably viewed by their more powerful peers as minor partners in these endeavors and may even have been frowned upon. Yet this did not prevent some governors from ambitiously seeking a role in the regime's repression and being heard by their superiors. This was especially the case when governors could build on a career as military or security officers, including **Samir Uthman al-Sheikh** (governor of Deir Ezzor and brigadier general who formerly served with the Political Security Directorate, or PSD), **Ahmad al-Sheikh Abdulqader** (governor of Quneitra and a retired brigadier general), **Amer al-Alchi** (governor of As-Suwayda and formerly a senior officer with the AFID), **Firas al-Ahmad** (governor of Tartous and formerly head of a branch of the GID in Homs), and **Jayez al-Hammoud al-Moussa** (governor of Hasakah and formerly chief of

83- “[Juna & Co](#)” (in French), L'Annuaire des Entreprises, République Française, last updated 12 November 2025; “[André Mayard](#)” (in French), L'Annuaire des Entreprises, République Française, last updated 12 November 2025.

84- [European Council Decision 2013/255/CFSP](#), 31 May 2013, Article 27(3), EUR-Lex, accessed 1 November 2025.

85- B2B-SY, “[Dr. Adib Mayaleh, Former Governor of the Central Bank of Syria and Former Minister of Economy and Foreign Trade...](#)” (in Arabic), Facebook post, 30 April 2020.

86- “[Experience — Adib Mayaleh](#),” LinkedIn, accessed 1 November 2025.

87- Commission for International Justice and Accountability (CIJA), “[Behind the Curtain: Unravelling the Bureaucracy of Syria's Machinery of Death](#),” December 2023, p. 14.

staff with the Syrian Air Force).⁸⁸

Bishr al-Saban, the governor of Damascus, actively contributed to regime repression in other ways. He ran Damascus Cham Holding company from its establishment in December 2016 until his dismissal as governor in November 2018. He played a key role in the de facto expropriation of the area's owners to make way for Marota City, a flagrant abuse of power. Al-Saban was close friends with those who stood to gain from the project, including Rami Makhoul, Bilal al-Na'al and Fadi Saqr. Moreover, al-Saban and his business associates ensured they bought shares in the project before its launch through Decree 66 of 2012—a classic case of frontrunning.⁸⁹

Alongside al-Saban, other individuals were involved in the Marota project, even when this was not immediately apparent from the government positions for which they were sanctioned. One of them was **Ahmad al-Hamo**, who served as Minister of Industry between 2016 and 2017 and was sanctioned for that role, first by the EU and later by the US, as he was deemed to share “responsibility for the Syrian regime’s violent repression of the civilian population.”⁹⁰ Yet next to serving the Syrian government generally, he was also a board member of Damascus Cham Holding company as a private investor, making him complicit in and a beneficiary of its violations of individual property rights.

Two other outwardly innocuous ministers were **Kinda al-Shammatt** and **Rima al-Qadiri**, who served consecutive terms as Minister of Social Affairs and Labour between 2013 and 2020 and were put under EU and (only al-Shammatt) US sanctions. Their portfolios as such do not immediately raise concerns about their roles in regime repression or violence; they too were placed under sanctions to generally convey a signal of disapproval of the Assad regime’s repression. Yet it emerged that both ministers were involved in regime policies under which hundreds of the young children of detainees were forcibly placed in orphanages—either to punish their parents for alleged opposition activities or to use the children as leverage in prisoner exchanges for regime soldiers.⁹¹ Shammatt and Qadiri reportedly facilitated these practices by altering children’s parental records, concealing who the children’s real parents were, and ordering orphanages, including those run by the international organization SOS Children’s Villages, to accept them with their new forged identities.⁹² To date, most of these children still have not been reunited with their parents.

88- “[United States of America v. Samir Ousman Alsheikh](#),” Case 2:24-cr-00483-HDV, United States District Court for the Central District of California, 12 December 2024 (June 2024 Grand Jury). — All of these governors were sanctioned except Samir Uthman al-Sheikh. He is currently being held and prosecuted in the US on charges of violating immigration rules and several accounts of torture.

89- Al-Lababidi, “[Damascus Businessmen: The Phantoms of Marota City](#).”

90- “[Council Implementing Regulation \(EU\) 2020/716 of 28 May 2020 implementing Regulation \(EU\) No. 36/2012 concerning restrictive measures in view of the situation in Syria](#),” EUR-Lex, accessed 1 November 2025.

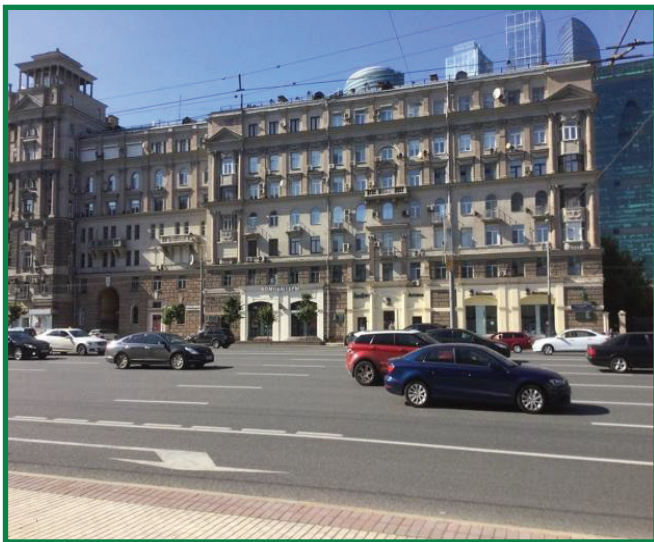
91- Lynzy Billing, “[How a Western Charity Helped the Syrian Regime Abduct Children](#),” The Observer (UK), 11 September 2025; Syria TV, “[The Crimes Are Further Exposed: Al-Assad, the Child Abductor | Syria Today](#)” (in Arabic), YouTube video, 8 June 2025, duration 20:40.

92- Mais Katt, Bashar Deeb, Charlotte Alfred, Monica C. Camacho, and Haya Al Badarneh, “[The Orphanage That Hid Us: How Syrian Intelligence Turned Children Into Pawns](#),” Al-Jumhuriya, 31 October 2025; “[Syria’s Interior Ministry Confirms to Enab Baladi the Arrest of Two Former Female Ministers](#),” Enab Baladi, 7 July 2025; SOS Children’s Villages, “[Our Commitment to Truth and Family Tracing Support in Syria](#),” Statement, 16 December 2024 (latest update 31 October 2025).

2. Where did they go?

Sanctioned regime incumbents responded in various ways to the fall of the Assad regime in December 2024. Some fled to third countries, others stayed in Syria or returned, and many managed to fall off the radar. Likewise, companies sanctioned for their complicity in regime repression and human rights violations stopped their operations or were shut down. Some were “restructured” by the transitional government, and others continued business as usual. To advance transitional justice and ensure that sanctions serve accountability, documenting the whereabouts and assets of sanctioned regime individuals and companies is paramount. We therefore traced the whereabouts of sanctioned regime incumbents and assessed the status of sanctioned companies.

In our investigation, we drew on media sources, social media footprints, and interviews with relatives and former regime insiders. Despite our best efforts, our research results are far from complete. Many individuals sanctioned for gross human rights violations simply vanished. For some of those individuals on whom we did find scraps of information or claims hinting at their whereabouts, the sources were not fully reliable, or these reports lacked sufficient details to allow for assertive conclusions. For this reason, we indicated varying levels of confidence for the suspected whereabouts of 131 sanctioned individuals on whom we found information. They are listed in Appendix 1. As for sanctioned companies, we found reliable but often still conflicting information on the status of 23 main entities, as listed in Appendix 2.



Change of address: Kutuzovskiy Prospekt 26, Moscow 121165

The story of President Assad’s dramatic departure from Syria is now widely known. Without informing even his closest aides, on 8 December 2024 Assad flew from Damascus to Hmeimim airbase and then onward to Moscow, where his wife Asma and his three children were waiting for him. It was reported that those accompanying Assad on the flight to Moscow were **Mansour Azzam**, a presidential advisor, and Yassar Ibrahim,

manager of Assad’s front companies. Russia granted the presidential couple “humanitarian asylum.” Maher al-Assad is believed to have fled to Sulaymaniyya in northern Iraq and then on to Moscow, where he was spotted and filmed in early June 2025. According to a senior foreign diplomat, Syria’s deposed president was put up in the home of late Soviet President Leonid Brezhnev, which is in Dorogomilovo District, an affluent Moscow neighborhood.⁹³ On 16 December 2024 Bashar al-Assad posted a

93- Interview with a senior foreign diplomat, July 2025; “[House of Brezhnev](#),” TripAdvisor, last updated 2025. — Brezhnev’s former home is located on the ground floor of Kutuzovskiy Prospekt 26, Moscow 121165. Other reports placed Bashar al-Assad’s exact whereabouts elsewhere in Moscow (see Appendix 1).

message on Telegram, but without revealing his location. He has not been heard from since, probably because the Russian authorities instructed him to lay low. On 12 February 2025 his son Hafez posted a video message on Instagram, showing himself walking in a street in Moscow. The former president's daughter, **Zain Bashar al-Assad** (not sanctioned), appeared in June 2025 in a video of a graduation ceremony at Moscow University, where she studied International Relations.⁹⁴

Hiding out in Russia

Russia became a favorite destination for many regime incumbents and officers who fled Syria. Out of 131 sanctioned individuals whose whereabouts we were able to trace, 24 fled to Russia—all of them members of the Assad family and senior officials. Yet the real number of regime henchmen ending up in Russia is much larger. According to the senior foreign diplomat cited above, about 2,000 Syrian army and security officers also found their way to Russia, where many of them were moved to a “camp” or to military barracks near Moscow. Their journey to Russia most probably occurred in two phases, starting in the immediate aftermath of the regime's fall in December 2024 and then accelerating in March 2025 during the transitional government's campaign to arrest former regime henchmen, which escalated in the sectarian massacres on Syria's west coast. In both instances, Hmeimim airbase showed an uptick in departing military flights.⁹⁵

Russia's intimate relationship with Syrian officers and militia leaders during its nine years of military intervention in Syria likely informed its hospitality. Letting down allies like those of the Assad regime would have had a chilling effect on other allies Russia may rely on, now and in the future. One may speculate that Russia also would not want to let the secrets and intelligence its Syrian military counterparts hold to fall into the wrong hands. Furthermore, Russia may intend to use wanted regime incumbents as leverage for getting Syria's new leadership to accept a host of demands, including keeping its military base at Hmeimim airport. However, in some cases Syrian regime officials simply found their way to Russia because they already held Russian citizenship, are married to a Russian national, and/or hold assets in the country.

Enjoying the glitz of Dubai

Many sanctioned individuals linked to the Assad regime ended up in the UAE. We were able to trace 21 of them. Of these, 15 are businessmen, while six fall into the category of “henchmen” (including their relatives). Business elites' ties with the UAE largely predate the fall of the regime, as most already had residence—mainly in Dubai—established companies there, often in partnership with influential Emirati businessmen, and owned high-end real estate.

94- Al-Marsad al-Suri (Syrian Observatory), “[The al-Assad Family Continues Its Education: From the Graduation Ceremony of Zein Bashar al-Assad...](#)” (in Arabic), Facebook post with video (duration 0:05), 30 June 2025.

95- Data gathered from [FlightRadar24](#), accessed 1 November 2025. — Most flights from Hmeimim went via Libya (al-Jafra and Barak airbases and Benghazi airport), where Russian forces have a military presence.

Syrian business ties with the UAE can largely be understood against the background of the Assad regime's erratic policies toward its business class, where entrepreneurs risked falling out of favor and losing their assets in Syria as the regime rearranged access to lucrative business opportunities as it saw fit. Prominent Syrian businessmen hedged against such risks by placing assets in the UAE while enjoying a life of opulence in Dubai's glitzy world of skyscrapers, restaurants, clubs, and hippodromes. In 2024 it was revealed that 3,716 Syrians, including at least ten sanctioned individuals, owned properties in Dubai, together worth USD 1.8 billion.⁹⁶ Some Syrian businessmen managed to obtain UAE citizenship. Seeking sanctuary when the regime collapsed, they fell back on the UAE, mostly adopting a wait-and-see attitude toward the new authorities in Syria before possibly deciding to return to their country.

The UAE has been widely known as a hub for those looking worldwide to launder or hide cash, thanks to its reputation for financial secrecy, low taxes, and investment opportunities in high-end real estate without questions asked.⁹⁷ More specifically, the UAE used partnerships with Syrian businessmen to get inroads into Syria, marrying its financial relations with its foreign policy aims, including taking Syria out of Iran's orbit.⁹⁸ The UAE has especially done so since it re-established ties with the Assad regime in 2018 while providing foreign currency to Syrian traders, hosting Syrian businessmen and officials at trade exhibitions and business events, and scouting for investment opportunities in Syria.⁹⁹ Following Assad's overthrow, the UAE has renewed efforts to leverage its ties to Syrian business elites in its engagement with the transitional authorities, as discussed further below.

While Syrian businessmen and their assets were already entrenched in the Emirati economy, the UAE is reported to have facilitated the transfer of Assad's valuables from Syria when the regime fell. Between 6 and 8 December 2024, Yassar Ibrahim arranged four flights from Damascus airport to Abu Dhabi's Al Bateen Executive Airport.¹⁰⁰ The planes carried bags, sculptures, paintings, hard drives, and computers containing information on Assad's economic network, financial details, and ownership records. Before one of the jets took off, vehicles belonging to the UAE embassy were spotted near the airport's VIP area, which may point to its involvement in the operation. The last flight to Abu Dhabi on 8 December made a stopover at Hmeimin airbase to load USD 500,000 in cash belonging to Al-Burj Investments, a company 50 percent owned by Yassar Ibrahim.¹⁰¹ An intelligence officer told the Reuters press agency that Ahmad Khalil,

96- The Syria Report (subscriber-only content), "[New Report Highlights Syrian Investments in Dubai Real Estate Market](#)," 21 May 2024; Muhamad Bassiki, Ali Alibrahim, and Hala Nasereddine, "[Dubai Unlocked: Ten Individuals Within Assad's Close Circle Hide 50 Million Dollars in Dubai Estates](#)," Daraj Media, 15 May 2024.

97- Organized Crime and Corruption Reporting Project (OCCRP), "[Dubai Unlocked](#)," project header page, published 14 May 2024.

98- Al-Souria Net, "[Economic Objectives Behind UAE Rapprochement with Assad. Who Benefits?](#)" The Syrian Observer, 22 April 2022.

99- The Syria Report (subscriber-only content), "[Report: Syria-UAE Economic Relations](#)," 14 December 2021; Khaled Al-Terkawi, "[Analytical Report: The Course of Restoring Relations Between the UAE and the Syrian Regime](#)," Jusoor for Studies, November 2022.

100- Feras Dalatey, Joanna Plucinska, Reade Levinson, and Maha El Dahan, "[Operation Assad: The Air Mission to Smuggle the Syrian Despot's Valuables](#)," Reuters, 17 April 2025.

101- Bassel Nader Mansour (not sanctioned) is noted as one of Yassar Ibrahim's partners in several companies and 50 percent owner of Al-Burj Investments. — "[Al-Burj Investments LLC](#)," The Syria Report (subscriber-only content), 5 April 2018; "[Profile: Bassel Nader Mansour](#)" (in Arabic), Manhom.com, accessed 1 November 2025.

Ibrahim's treasurer, was also on board. He is said to have reached Hmeimim airbase in an armored vehicle belonging to the UAE embassy while carrying the cash withdrawn from **Cham Islamic Bank**, a bank affiliated with "The Group" and sanctioned by the US in May 2017.

Concealed in Lebanon

Lebanon ranks among the three countries hosting most sanctioned individuals who were part of or linked to the Assad regime. We were able to confirm that 17 prominent and sanctioned Assad regime officials and business allies made it to Beirut, Tripoli, and elsewhere in Lebanon. About half of them are "henchmen," including one of the notorious perpetrators of the Tadamon massacre, MID warrant officer **Amjad Youssef**, who is believed to have undergone plastic surgery to avoid being recognized. He was put under Western sanctions in 2023. Bassam Hassan also resides in Lebanon after he had initially fled to Iran. Diagnosed with cancer, he is receiving medical treatment in Beirut. The real number of individuals who served in the Syrian military and intelligence agencies and who fled to and now reside in Lebanon is likely to be much higher, with some Lebanese media claiming that their number runs into the thousands.¹⁰² The other half of those sanctioned individuals whose whereabouts we were able to trace are regime-linked businessmen, most prominently Hussam Qatarji and his relatives.

The composition of Syrian regime individuals in Lebanon reflects what the country can offer them: ineffective law enforcement agencies in combination with Hezbollah's help and protection, which have allowed former Assad henchmen to enter Lebanon and avoid arrest or detection even if the Lebanese authorities should decide to go after them.¹⁰³ In addition, Lebanon's still largely unregulated and corrupt banking sector and business world have provided Assad's business elites with ample opportunities to launder, hide, and invest their money. Several Syrian businessmen linked to the Assad regime had already established or acquired companies in Lebanon, making the country, after the UAE, their most favored destination for placing their money. In addition to the sanctioned businessmen listed under "Lebanon" in Appendix 1, some others who do not reside in that country also own companies there.

Over the years many Syrians have placed their money in Lebanese banks. Some estimated these deposits at tens of billions of USD—including President Assad, who in November 2020 claimed that their amount reached up to 40 billion USD.¹⁰⁴ In an attempt to temper unrealistic expectations, a source close to Syria's new president

102- Nidaa al-Watan, cited in "[Hezbollah Said to Have Helped Assad Officials Flee to Lebanon, Sparking Furor in Beirut](#)," Times of Israel, 13 December 2024.

103- However, in December 2024, 20 members of the Fourth Division and Syrian armed forces and security agencies were reportedly arrested by Lebanese security forces. — "[Two of Assad's Relatives Arrested as They Tried to Fly Out of Lebanon, Officials Say](#)," Times of Israel, 28 December 2024. — On 27 December the Lebanese authorities handed over 70 soldiers and officers to Syria's transitional government. It is not clear whether they included the 20 individuals arrested earlier. — Ali Darwish, "[What Is the Risk of Former Regime Officers Disappearing in Syria](#)" (in Arabic), Enab Baladi, 20 January 2025.

104- Hind Khalifa, "[After Being Held for More Than 5 Years, Will Syrians' Deposited Funds in Lebanese Banks Be Returned?](#)" (in Arabic), 7al.net, 28 April 2025; "[Bashar al-Assad: 40 Billion Dollars Belonging to Syria Are Held by Lebanese Banks \(Video\)](#)" (in Arabic), Syria TV (Istanbul – Reports), 5 November 2020.

Ahmad al-Sharaa claimed in March 2025 that the real amount that Syrians hold in Lebanese banks more likely ranges between three and four billion USD.¹⁰⁵ Whatever their total value,¹⁰⁶ not all or even most of these assets necessarily belong to sanctioned Syrians or to those who were complicit in the Assad regime's repression and corruption. For instance, already a few months into the Syrian uprising that started in March 2011, billions of USD were withdrawn from Syrian banks and placed abroad, especially in Lebanon, because depositors feared a collapse of Syria's banking sector.¹⁰⁷ Since Lebanon's own banking sector broke down in 2019, both Syrian and Lebanese depositors have been denied access to their savings.

Assets that were brought into Lebanon immediately after the fall of the regime are likely to have been primarily in the form of bags of cash. One Syrian businessman based in Beirut said that in the first few weeks after the regime's collapse it was virtually impossible to hire a private safe at Lebanon's banks, due to a surging demand by Syrians who entered the country carrying suitcases of cash.¹⁰⁸ His bank called him to ask whether he still needed his own safe, to make space for other customers. Many newly arriving Syrians converted their cash into gold, prompting a perception that their demand contributed to a steep rise in Lebanon's gold prices.¹⁰⁹

For many regime fugitives, Lebanon is not their final destination. One Syrian businessman in Beirut said many former regime incumbents who ended up in Lebanon are worried that they will not be safe from prosecution or other measures against them, given the waning power of Hezbollah and a perceived inclination of Lebanese President Joseph Aoun and Prime Minister Nawaf Salam to be more susceptible to whatever Western pressures, if any, may be applied.¹¹⁰

Several senior officers and others linked to the Assad regime escaped from Syria to Lebanon to immediately catch a flight elsewhere. **Buthaina Shaaban**, Assad's presidential advisor and spokesperson, left Syria when the regime fell, traveled to Lebanon, and on to Oman. Ali Mamlouk, the notorious intelligence chief, appeared in a video showing him crossing the al-Kabir River between Syria and northern Lebanon in a rubber boat. He likely stayed in the southern suburbs of Beirut under the protection of Hezbollah before moving on to Moscow.¹¹¹ Rami Makhlouf fled Syria in a convoy also carrying a number of his relatives. On the motorway from Damascus to Beirut the

105- Lebanon On, "[A source close to Syrian President Ahmad al-Sharaa told Nidaa al-Watan...](#)" (in Arabic), Facebook, 19 March 2025.

106- For a discussion see "[Cash-Strapped Government Eyes Blocked Deposits in Lebanese Banks](#)," The Syria Report (subscriber-only content), 28 January 2025.

107- Abigail Fielding-Smith, "[Syrian Capital Flight Intensifies](#)," Financial Times (subscriber-only content), 7 November 2011; Vittorio Maresca di Serracapriola and Karam Shaar, "[Syria and the FATF Gray List: Barriers to Financial Reintegration and Pathways Forward](#)," Observatory of Political and Economic Networks (OPEN), 28 March 2025.

108- Interview with a Syrian businessman, via Zoom, March 2025.

109- Interview with a former regime insider in Beirut, October 2025. — Gold prices in Lebanese Pounds rose sharply between the third week of December 2024 until the end of February 2025. — Data from "[Gold Price in Lebanon](#)," GoldPrice.org, accessed 1 November 2025. — However, in the same period international gold prices also went up. — "[Home Page](#)," GoldPrice.org, accessed 1 November 2025.

110- Interview with Syrian businessman, via Zoom, March 2025.

111- Mamlouk's escape from Syria was reportedly facilitated by a Syrian security officer close to Hezbollah. — Kafa Alyounes, "[The person who appeared in the video wearing a blue sweater—his photo is in the comments—is named Haitham Ballan...](#)" (in Arabic), Facebook post and video (0:20 duration), 3 May 2025.

convoy came under heavy gunfire, injuring Rami's brother Iyad and killing his other brother Ihab.¹¹² When they reached Beirut, Rami, Iyad and their relatives traveled on to the UAE. **Jamil Hassan**, the former chief of the AFID responsible for mass atrocities and torture, is believed to have stayed for several weeks for medical treatment at the American University Hospital in Beirut. The Lebanese authorities failed to arrest him, despite assurances to do so in response to an international arrest warrant issued by the US. He is believed to have moved on to Moscow. Yet in December 2025 current and former Syrian and Western officials cited by The Wall Street Journal said he was back in Lebanon.

Vanishing elsewhere

A small number of sanctioned regime officials and businessmen went to other countries. At least six went to Oman, including Buthaina Shabaan and intelligence officer **Abdul Fattah Qudsiya**. Both already had ties to Oman, Shabaan as she had visited the country several times to meet with Omani government officials and Qudsiya because his daughter held a senior position at the Syrian embassy in Muscat. Some went to Jordan. Others fled to Türkiye, like **Amer Khitti** (see picture).



We traced only three sanctioned individuals to Europe: Adib Mayaleh and **Salah Habib** in France, and Atiya Khoury in Hungary. All three had moved or had ties there before the fall of the Assad regime. It is still highly probable, however, that more sanctioned regime incumbents and their business allies fled to European countries, possibly traveling with false identities.¹¹³ The Assad regime reportedly had issued thousands of false identity cards to its military and security personnel to enable them to conceal their identities.¹¹⁴ During the war years, a thriving market in forged Syrian passports, together with the regime's efforts to cash in on the high demand for passports in general, made it difficult to distinguish fraudulent documents from genuine ones.¹¹⁵ The burning down of the main Immigration and Passport Department in the Zablalani area in Damascus on the day the Assad regime fell may well have been an attempt to conceal that many passports had been tampered with.¹¹⁶ At the end of December 2024,

112- "[Reports of the Death of a Member of the Makhoul Family and the Injury of Another While Fleeing Damascus](#)" (in Arabic), Syria TV (Istanbul), 9 December 2024.

113- For instance, Hafez Makhoul is alleged to have been travelling freely using a forged passport. — Syrian Observatory for Human Rights, "[Director of the Syrian Observatory: We hope the Syrian government will take advantage of the suspension case...](#)" (in Arabic), Facebook post with video (25:46 duration), 30 May 2025.

114- The Syrian Detainees Council, "[Documents of the 'Great Deception': Forged Cards Used by Perpetrators to This Day to Evade Justice...](#)" (in Arabic), Facebook post, 20 March 2025.

115- Ghaith Abdul-Ahad in Athens and Patrick Kingsley, "[Concern over Burgeoning Trade in Fake and Stolen Syrian Passports](#)," The Guardian, 8 September 2015; Robert Siegel, "[Why Syrians Are Entering Europe with Fake Passports](#)," interview with Ewa Moncure, transcript, All Things Considered (NPR), 10 September 2015.

116- Amr Abdallah Dalsh, "[Aftermath of a Fire at the Department of Immigration and Passports, in Damascus](#)," Reuters photo (TPX Images of the Day), 12 December 2024.

the Syrian embassy in Beirut suspended its consular services after it emerged that the embassy had issued forged passports held by **Rifaat al-Assad's** granddaughter and her mother.¹¹⁷ Other regime officials and businessmen such as Fares Shehabi, Mazen Tarzi, and others, can travel relatively easily because they possess dual nationality, using their Western or other passports that may not immediately raise suspicions with border officials or prompt further checks.

Regime assets in Europe and beyond

The prosecutions of Rifaat al-Assad in French and Spanish courts may suggest that Assad-regime officials and businessmen likewise conceal substantial assets in European countries.¹¹⁸ A conviction in France in 2020 for money laundering and embezzlement forced Rifaat to return to Syria after living for more than three decades in exile in Europe. Upon the fall of the regime, he fled to Dubai, traveling via Lebanon.¹¹⁹ His conviction, as well as ongoing court proceedings against him and eight of his relatives in Spain for financial crimes, reveal an intricate web converging around two main trust funds linked to shell companies, frontmen, offshore bank accounts, and hidden assets in Spain (including Malaga), Gibraltar, Luxembourg, Malta, Guernsey, the US (Delaware), Panama, and the Bahamas. In the French case his confiscated assets amounted to EUR 90 million, while Spanish judicial authorities froze assets worth EUR 700 million in addition to hundreds of real estate properties.¹²⁰ However, insights into how Rifaat and his relatives managed their assets tell us little about where and how sanctioned officials and businessmen of the Assad regime are hiding theirs. Rifaat and his direct relatives (except **Mudar Rifaat al-Assad**, one of his sons) were never subjected to Western sanctions.

In contrast, sanctions on Assad regime officials and businessmen are likely to have deterred them from following Rifaat's example, causing their asset management to avoid European or US jurisdictions. In fact, Rifaat himself seems to have foreseen trouble when in 2011 he started to sell off properties—mainly in the UK—as Western sanctions against Syria generally began to mount.¹²¹ Judicial proceedings against Rifaat starting in 2013 would also have caused sanctioned officials and businessmen of the Assad regime to think twice before keeping or placing their money in Europe or the US. Therefore, most assets of sanctioned Syrian regime officials and businessmen that were placed in Europe are likely to predate 2011–2012 and were moved elsewhere

117- [“Syrian Embassy in Beirut Suspends Services over Assad Family Forged Passports,”](#) This Is Beirut, 28 December 2024.

118- Rifaat al-Assad (not sanctioned) is Bashar al-Assad's paternal uncle. He was involved in the ruthless suppression of an insurgency in the early 1980s, which culminated in a bloodbath in Hama in 1982 whereby he directed regime forces in killing thousands of people and destroying much of the city. After he launched a failed coup attempt in 1984 against his brother President Hafez al-Assad, he lived in exile in Europe until 2021, including in Switzerland, Spain and France.

119- [“‘Butcher of Hama’: Assad’s Uncle Rifaat Fled to Dubai, Lebanese Officials Say,”](#) France24, 27 December 2024.

120- [“Trial in Spain Against Rifaat al-Assad: EUR 700 Million in Assets at Stake,”](#) The Syria Report (subscriber-only content), 6 May 2025.

121- Nabila Ramdani, [“Syria: Assad Family ‘Selling Off Overseas Property Empire,’”](#) The Telegraph (subscriber-only content), 6 October 2011.

during the first two years of the Syrian uprising.¹²² One exception to this is sanctioned Syrian businessman Samir Hassan, a protégé of Rami Makhoul. He apparently was not deterred, as he kept moving assets to the British Virgin Islands, even establishing new companies there until 2015.¹²³ He may have been instructed to stay active in the Virgin Islands, to test the waters and to assess UK officials' resolve to enforce individual designations.

We also came across a claim by the GID, detailed in its intelligence report mentioned earlier, that General Bassam Hassan deposited more than EUR 85 million in Greek bank accounts registered in the name of another Syrian national.¹²⁴ Some Greek banks were repeatedly fined for violating Syria financial sanctions regulations,¹²⁵ but we were unable to verify the specific claim about Hassan.

More generally, the amount of remaining Syrian assets in Europe is unknown, but it is unlikely to be significant. Only the UK discloses relevant data in this regard, in its annual "Frozen Asset Review," which in 2023–2024 put the amount of frozen Syrian assets in the UK at GBP 157.3 million.¹²⁶ This amount has not changed significantly since 2012, which probably suggests that those at risk of an asset freeze due to sanctions already took most of their money elsewhere. As Walid al-Mu'allim, Syria's late Foreign Minister, said in 2016: "We will forget there is Europe on the map. Instead, we are moving east and south. The world is not only Europe."¹²⁷

It seems plausible that some sanctioned Syrian nationals invested their money globally, beyond Europe and the US, in tax havens and offshore jurisdictions like the Cayman Islands, Panama, the Bahamas, and elsewhere. Rifaat al-Assad knew his way to these places. Several financial data leaks, including that of the "Panama Papers," mention a number of Syrian companies with assets in or links with the Bahamas, Bermuda, the Seychelles, and Aruba.¹²⁸ These included sanctioned companies **Maxima**

122- On Syrian regime assets in the UK and the British Virgin Islands, see: "[#PanamaPapers Link Assad's Fixer to Arms-Dealers and Money Launderers](#)," The New Arab, 13 April 2016; Frederik Obermaier and Bastian Obermayer, "[Shell Companies: Helping Assad's War](#)," Panama Papers (Süddeutsche Zeitung), accessed 1 November 2025. — According to former Interior Minister Muḥamad al-Shaar, President Assad in 2012 instructed all his and Syrian state assets held in Europe to be withdrawn, fearing that sanctions would be firmly imposed. Interview with Muḥamad Shaar, Damascus, 7 August 2025. Perhaps indicative in this respect is that Drex Technologies, a company owned by Rami Makhoul, was struck off the company register of the British Virgin Islands in April 2012. — "[Panama Papers – Mossack Fonseca: DREX TECHNOLOGIES S.A.](#)," Offshore Leaks Database, International Consortium of Investigative Journalists (ICIJ), accessed 1 November 2025. — Makhoul used this company to register part of his shares in Syriatel. — "[Panama Papers – The Power Players: Bashar Assad](#)," Offshore Leaks Database, International Consortium of Investigative Journalists (ICIJ), accessed 1 November 2025.

123- Ahmad Ashour, "[Pandora Papers: How Syrian Companies Operate in the Caribbean via Lebanon](#)," Daraj Media, 6 December 2021.

124- "Respected Mr. Bassam Hassan," classified report prepared by the General Security Directorate, 23 June 2020 (in Arabic).

125- "[Sanctions](#)," Bank of Greece, accessed 1 November 2025.

126- "[OFSI Annual Review 2023–24: Engage, Enhance, Enforce](#)," Office of Financial Sanctions Implementation (OFSI), HM Treasury (UK), March 2025, accessed 1 November 2025.

127- Baladi News – Media, "[Syrian Foreign Minister Walid al-Muallim: We Will Forget That Europe Is on the Map](#)" (in Arabic), YouTube video, 0:37 duration, 19 April 2016.

128- "[Syria](#)" (search results), Offshore Leaks Database, International Consortium of Investigative Journalists (ICIJ), accessed 1 November 2025.

Middle East Trading, Pangates International, and **Abdulkarim Group**; three connected entities shown to have assets in the Seychelles.¹²⁹ **Abdul Jalil Mallah**, a Syrian businessman active in the maritime transport sector, was sanctioned by the US in June 2021 for his links with the IRGC and Houthi operatives in Yemen. He had registered some of his companies in the Marshall Islands.¹³⁰ Some Assad regime individuals obtained—and likely bought—diplomatic passports for some of these countries, including Mudar Rifaat al-Assad who was appointed honorary consul for Antigua and Bermuda.¹³¹ This provides them with diplomatic immunity and makes it easier to travel, but it also suggests that they hold assets in these countries. Assad-regime officials are also alleged to have had ties to drug gangs and armed groups in Columbia, Mexico, and Venezuela, facilitated by Lebanese drug trafficker **Antoine Kassis**.¹³² The latter also reportedly helped Lebanese Central Bank governor Riad Salameh to launder money,¹³³ and he may have used his connections in Latin America to provide similar services to individuals associated with the Assad regime. All of these leads need further scrutiny, as Syrian regime assets being hidden globally are still to be fully gauged.

While Assad-regime figures and their business allies had ample opportunities to move assets into global offshore centers and tax havens, they may not have had a strong incentive to do so, and such practices likely did not occur on a large scale. Unlike other Arab dictators such as Yemen's late President Ali Abdallah Saleh—who hid assets across more than 15 jurisdictions¹³⁴—Assad's men could trust their money to two reliable allies. The UAE was and still is attractive in this respect, given its reputation of financial discretion, its long-standing ties with Syrian business elites, and its political allegiance to the regime since at least 2018. Russia has been the regime's unflinching ally for much longer. Placing their assets in Beirut, conveniently only a few hours' drive from Damascus and without a strong government to go after their owners, was another option. It seems most likely that when the regime fell, those henchmen and business

129- James Denselow, "[Panama Papers: How the Seychelles Saved Syria](#)," Al Jazeera, 12 April 2016; Obermaier and Obermayer, "[Shell Companies: Helping Assad's War](#)." — All three companies were delisted by the US and UK in 2025.

130- US Treasury, "[Treasury Sanctions Network Financing Houthi Aggression and Instability in Yemen](#)," press release, 10 June 2021.

131- Unlike Rifaat al-Assad's other siblings, wife and ex-wives, Mudar al-Assad and his brother Somar spent most of their time in Syria. In April 2023 Mudar was subjected to EU sanctions for being a member of the Assad family. His suspected involvement in the captagon trade is likely to have been another reason. In September 2024 Al-Jazeera broadcast a leaked recording of conversations involving an AFID operative mentioning Mudar in the context of smuggling routes used in the captagon trade. Mudar al-Assad owns several transportation and shipping companies. Al Jazeera, "[Al-Mutahari Reveals Evidence of the Assad Family's Involvement in the Captagon Trade](#)" (in Arabic), video, 2:32 duration, 16 September 2024; "[EU Sanctions Cousins of Syria's Assad for Alleged Drug Trafficking](#)," France24, 24 April 2023. — He also faces an arrest warrant in Lebanon for running a network smuggling stolen cars into Syria, for which he was arrested at the Lebanese-Syrian border in April 2019 but then immediately released. — Riad Tawk, "[Arrest Warrant Issued Against al-Assad in Lebanon... and the Judge Releases Him](#)" (in Arabic), MTV Lebanon, 15 April 2019.

132- Antoine Kassis was extradited from Kenya to the US and is currently charged with drugs trafficking and money laundering. — Ephrat Livni, "[Crime Rings Plotted to Trade Cocaine for Syrian Weapons, Prosecutors Say](#)," The New York Times (subscriber-only content), 28 May 2025; "[United States of America v. Wisam Nagib Kherfan-Okde et al.](#)," US District Court for the Eastern District of Virginia, filed 5 March 2025, storage.courtlistener.com, accessed 1 November 2025.

133- Nada Maucourant Atallah, "[Broker Used by Riad Salameh's Lebanon Central Bank Accused of 'Extravagant' Irregularities](#)," The National, 6 September 2023.

134- "[Yemen's Stolen Assets: Past and Future](#)," Civil Forum for Asset Recovery (CIFAR), 2020.

elites fleeing the country typically followed their stolen or ill-gained assets placed in these three countries. Here they felt confident that they could evade justice, live in relative safety, and buy themselves a comfortable lifestyle now that they were no longer in power.

Staying put or back in Syria

Of the 131 sanctioned individuals on whom we found whereabouts information, 57 remained in Syria or returned after the fall of the regime. Seventeen are businessmen who were closely linked to the regime. Fourteen are henchmen who held high positions in the military or intelligence agencies. At least five were ministers and bureaucrats. Their motivations for staying or returning vary wildly.

A number of the Assad regime's business allies decided to stay in Syria or later returned. We found at least eight sanctioned companies to be still operating in Syria without any known change of ownership or restructuring. The path these businessmen chose, compared to their peers who fled, can partly be explained by the nature and location of their assets. When businessmen hold large assets abroad, such as the Qatarjis, Rami Makhlouf, and Samer Foz, they have less incentive to return to Syria, as doing so would require negotiating a settlement with the transitional government. Details of such arrangements involving prominent sanctioned businessmen are presented in Section 3 below.

By contrast, when Syrian businessmen had fewer or no assets abroad, they were more likely to reach a deal enabling their return. This is especially true for Muhamad Hamsho, who holds primarily immovable assets in Syria, including a scrap metal processing factory that cannot be easily relocated. It may not be a coincidence that he was among the first businessmen to agree to an arrangement with the transitional government that allowed him to retain at least part of his holdings. Similarly, Anas Talas may have become increasingly dependent on his real estate investments—such as those in Marota City—making it difficult to leave the country without forfeiting most of his assets.

Some regime henchmen managed to reach deals with Syria's new rulers after switching sides during the rapid advances of HTS and other rebel groups that ultimately culminated in the overthrow of the Assad regime. **Abdullah Berri** and his clan reportedly received guarantees that they would not be prosecuted if they laid down their arms when HTS and other armed groups seized control of Aleppo in November 2024. **Fadi Saqr** struck a deal with HTS forces as soon as the latter approached Damascus to overthrow the regime. One HTS official explained that Saqr had ensured his men would not take up weapons against HTS, contributing to the fact that Damascus fell without much fighting.¹³⁵ Saqr then served as mediator between the interim authorities and remnants of the Assad regime.

135- Interview with a senior advisor to the transitional government, Damascus, June 2025.

More generally, and across all categories, some sanctioned individuals probably did not have the necessary funds or connections abroad to get out of the country. This is



likely to have been the case for Muhamad Shaar, former Interior Minister, who is not known to have been active in business or being particularly wealthy. Military and security officers without known sizable assets or connections abroad include **Mizar Sawwan**, a Syrian Air Force commander responsible for indiscriminate bombing, **Badi Mu'allah**, also with the Syrian Air Force and accused of involvement in the use of chemical weapons, and **Jawdat Ibrahim Safi**, a brigadier-general in the Fourth Division.

Atef Najib's reputation may have been so toxic that third countries were unlikely to accept him, and no one—including within the Assad regime with better connections abroad—was willing to advocate on his behalf. Najib's name is inextricably connected to the gruesome torture and killing of 15 teenage boys in Daraa, including **Hamza Ali al-Khatib** (see picture), widely considered as a pivotal moment sparking the Syrian uprising. Najib was sacked as head of the PSD in Daraa in 2011 and fell into obscurity.

Reputational problems may also have prevented some businessmen from being able to find refuge in third countries. Abdul Jalil Mallah is a Syrian businessman active in maritime transport, formerly operating from Greece. His links to Iran, in addition to receiving several court convictions in the UK, may have caused the UAE to be reluctant to host him.

Furthermore, and perhaps together with financial constraints, some may have thought that they had nothing to hide, let alone account for: that their crimes paled in comparison with other Assad officials and business elites, and/or that the real nature of their involvement in regime repression would not be exposed. This applies primarily to those who were sanctioned only because they served as ministers or ministers of state with relatively innocent portfolios. In fact, these cases are likely to be somewhat underrepresented in our sample of recorded whereabouts specifically because they tend to cause less controversy.



Yet others may have expected, rightly or wrongly, to receive similar treatment and remain in obscurity, including **Ali Haidar**, former minister of state for national reconciliation, **Lina Mohammed Nazir al-Kinayeh**, a former advisor to Assad, and former Social Affairs ministers Kinda al-Shammatt and Rima al-Qaddiri.

Others who were sanctioned may have considered the evidence against them to be too flimsy to pose a real threat of prosecution. For instance, businessman **Abdellatif Hamideh** was sanctioned by the UK, EU, and US in 2023 and 2024 for his alleged involvement in the captagon trade, which he denies. The only purported evidence that has emerged against him thus far is footage of a shipment of captagon pills concealed in paper rolls that were seized in Salerno, Italy, in 2020 (see picture on previous page, by Reuters) The same type of paper rolls was found to be produced in one of Hamideh's factories in Aleppo's industrial zone Sheikh Najjar.¹³⁶ The German weekly Der Spiegel reported on the affair and Hamideh's alleged role in the captagon trade but later removed references in its article to Hamideh, now only mentioning him as denying any involvement.¹³⁷

Some businessmen associated with the Assad regime appear to be weighing their options before deciding whether to return and resettle in Syria. They can afford to delay such decisions because they hold residence permits and/or assets abroad, in Dubai, Oman, Lebanon, and Kuwait. Many are currently negotiating their status with the transitional government, and those who have already reached agreements are assessing whether the government will uphold its commitments. Section 3 discusses their situations, along with those of others, as Syria initiates a process of transitional justice and accountability for the Assad regime's crimes.

136- US Treasury, "[Treasury Targets Hizballah Finance Network and Syrian Captagon Trafficking](#)," press release, 16 October 2024.

137- Christoph Reuter, "[World's Largest Drug Seizure in Italy: Real Drugs, Fake Jihadists](#)" (in German), Spiegel Ausland, 3 July 2020.

3. Transitional justice involving sanctioned entities

Immediately after the fall of the Assad regime, HTS leaders promised a new Syria that would be firmly set on a path of transitional justice and accountability for the Assad regime's crimes. On 10 December 2024, HTS leader Ahmad al-Sharaa vowed the release of a "list number one" containing the names of senior individuals involved in regime violence. He said, "We will not falter in holding accountable the criminals and killers, along with the security and army officers involved in torturing the Syrian people. We will pursue war criminals and request them from the countries they fled to until they receive their just punishment."¹³⁸

The promise of justice

Upon his appointment as President in January 2025, Ahmad al-Sharaa listed his priorities, which included "pursuing the criminals who have been steeped in Syrian blood, and committed massacres and crimes against us, whether among those who have gone into hiding inside the country, or have fled outside it, via true transitional justice."¹³⁹ Transitional justice formed one of six key themes of a "National Dialogue" conference, organized by the transitional government and held on 25 February 2025. In a final statement produced by the conference, participants duly emphasized the importance of transitional justice and called for judicial reform and the enactment of the necessary legislation to bring it to realization.¹⁴⁰

Throughout, members of the transitional government have repeated promises to firmly hold former senior regime members and their accomplices to account. On 5 April 2025, Foreign Minister As'ad al-Sheibani marked the commemoration of the Assad regime's 2017 chemical attack on Khan Sheikhun (Idlib) by noting that accountability will not just be symbolic but part of a comprehensive state-led process.¹⁴¹

Fierce fighting in March 2025 in Syria's coastal areas involving armed groups of regime "remnants" (*fallul al-nizam*) appears to have given additional urgency to the transitional government's resolve to pursue measures against those responsible for crimes in the past and present. Assadist armed groups that continued to be active appeared to be led and supported by former regime officials. Following these violent clashes, President Ahmad al-Sharaa gave a speech in which he emphasized that "we will focus in the coming period on prioritizing the achievement of internal peace and the pursuit of criminals who are responsible for Syrian bloodshed, whether they have remained inside the country or fled abroad. This will be done through true transitional justice measures."¹⁴²

138- Enab Baladi, "[Al-Jolani: We Will Hold Regime Criminals Accountable](#)" (in Arabic), 10 December 2024.

139- Aymenn Jawad Al-Tamimi, "[Ahmad al-Sharaa's Address to the Syrian Nation: Translation and Overview](#)," Aymenn's Monstrous Publications (blog), 30 January 2025.

140- "[Final Statement of Syrian National Dialogue Conference Calls for Preserving Unity of Syria and Sovereignty over Its Entire Territory](#)," SANA (Syrian Arab News Agency), 25 February 2025.

141- "Al-Shaybani Vows to Hold Perpetrators of the Khan Sheikhoun Massacre Accountable" (in Arabic), Zaman al-Wasl, 5 April 2025.

142- Syria Network News, "[These Are the Priorities According to President Ahmad al-Sharaa. What Are You Waiting For, Minister of Justice?](#)" (in Arabic), X (formerly Twitter) post, 22 April 2025.

There is little doubt that the transitional government's stated determination to hold Assad regime incumbents and their accomplices to account is widely shared among many Syrians who paid a heavy price for opposing the regime's repression through imprisonment, torture, displacement, and death. Syrian human rights organizations, associations of relatives of missing persons, and prominent lawyers and activists have produced numerous blueprints and proposals underscoring the importance of an inclusive, transparent, and victim-centred process of transitional justice, and offered as many suggestions detailing how accountability is to be achieved.¹⁴³

Any such effort toward transitional justice would be faced with difficult choices and numerous obstacles. Yet thus far the transitional government has accomplished far too little. Some of its harsher critics have accused it of largely abandoning its efforts to bring regime henchmen, state officials, and their business allies—many sanctioned by the West—to justice. Those holding a milder view still acknowledge the transitional government's sincerity in aiming at a serious process of transitional justice but point at numerous missed opportunities, inconsistencies, questionable dealmaking and, above all, a glaring lack of transparency. Either way, Syria's process of transitional justice is already in a deep crisis even before it has started in earnest.

Timid steps toward transitional justice

A first concrete step taken by the new authorities was to call on all former army and security officials to present themselves at local registration offices and hand in their weapons. This measure was meant to temporarily “settle” their status, pending unspecified further steps. Tens of thousands of security officers and others were given proof of them having undergone a “settlement” (*taswiya*) by handing them a card or a simple piece of paper that expired in three months' time (see picture).¹⁴⁴ They also received a civilian identity card.



143- Proposals by the Syrian Network for Human Rights (SNHR) as to how Syria can embark on a process of transitional justice and accountability are perhaps the most detailed and thoughtful. See: “[Perpetrators of Crimes Against Humanity and War Crimes Must Be Held Accountable](#),” Syrian Network for Human Rights, 23 December 2024; “[SNHR’s Vision to Achieve Political Pluralism and Form a Transitional Justice Body](#),” Syrian Network for Human Rights, 6 March 2025; “[SNHR’s Vision for Transitional Justice in Syria](#),” Syrian Network for Human Rights, 17 April 2025.

144- AlJumhuriya.net, “[Six Months After the Status of Tens of Thousands of Former Regime Soldiers Was Regularized, They Now Face an Uncertain Reality...](#)” (in Arabic), Facebook post, 17 June 2025.

In February 2025, the transitional government announced the creation of the “National High Commission for Missing Persons” (NHCMP), tasked with tracing and documenting more than 177,000 people estimated to have been forcibly disappeared, and clarifying their fate.¹⁴⁵ On 13 March 2025, the transitional government reinforced its commitment to accountability through a “constitutional declaration” that stated “war crimes, crimes against humanity, genocide, and all crimes committed by the former regime” would not be protected by the principle of non-retroactivity.¹⁴⁶ The same declaration also created a Transitional Justice Commission (TJC), charged with “adopting effective, consultative, victim-centered mechanisms to determine accountability mechanisms, the right to know the truth, and justice for victims and survivors, in addition to honouring martyrs.”¹⁴⁷

The process of *taswiya* addressed a practical problem of members of the armed forces and intelligence agencies needing a civilian identity card to be able to move around. Arguably, it also made a modest contribution to reducing the proliferation of small firearms. Yet to the public it remained unclear what the process implied, especially whether or not it granted amnesty to members of the former regime’s military and intelligence agencies. Adding to the confusion was the lack of information publicly shared on who had undergone the procedure, even when transitional government officials claimed that tens of thousands had reported themselves, more than 62,000 in Latakia governorate alone.¹⁴⁸

One transitional government official explained that “*taswiya* is to prevent fighting and revenge. If a court asks for them to be prosecuted, they will be taken to court. Having done *taswiya* could then be to their advantage. But it is not a pardon.”¹⁴⁹ All the same, the impression that many will be left off the hook was seemingly confirmed when there were no follow-up actions taken after the three-month *taswiya* cards expired. Some prominent former regime officials notorious for serious crimes, including Republican Guard commander Talal Makhoul (put under Western sanctions), were left untouched after meeting the *taswiya* requirement. It was reasonably inferred that some sort of deal-making had been at play.¹⁵⁰ For those having gone through the process of *taswiya*, the expiry of their cards created deep uncertainty about their fates.¹⁵¹ They were left in limbo, or as one commentator put it, it was as if their identities were “suspended” or deliberately left in a grey zone.¹⁵²

145- Enab Baladi, “[High Commission for the Missing Persons in Syria](#),” 28 February 2025.; “[Fourteenth Annual Report on Enforced Disappearances in Syria on the Occasion of the International Day of the Victims of Enforced Disappearances](#),” Syrian Network for Human Rights, 30 August 2025.

146- “Constitutional Declaration of the Syrian Arab Republic” (automated translation), ConstitutionNet, 13 March 2025, Article 49.

147- “[Constitutional Declaration of the Syrian Arab Republic](#)” (automated translation), Article 49.

148- Interview with a senior advisor to the transitional government, Damascus, June 2025.

149- Interview with a senior advisor to the transitional government, Damascus, June 2025.

150- See “[Maxim Khalil Criticizes the Continued Presence of Corrupt ‘Money Whales’ in Damascus and Calls on the New Government for Transparency](#)” (in Arabic), Shaam Network, 18 January 2025.

151- Interview with a former police officer, Damascus, May 2025.

152- Nawar Jabbour, “[The ‘Settlement Card’: Improvised Justice and Its Bureaucracy in Syria](#)” (in Arabic), Daraj Media, 3 July 2025.

Arrests of Assad regime officials and accomplices

The transitional government has been keen to convey the message that it is taking tough action against the Assad regime's henchmen and accomplices. Especially from the end of February 2025, mug shots of detained former officers and militiamen began to circulate daily on social media, sometimes based on press releases by the Interior Ministry. A policy aimed at accountability for the Assad's past crimes now seemed inextricably linked to, if not surpassed by, growing concerns that *fallul* were reorganizing themselves to stage an insurgency or carry out acts of sabotage.

Yet other considerations—most probably parochial—seemed to be at play as well when selecting those to be arrested. While there may have been plenty of other legitimate reasons for these individuals' detention, some were unlikely to play a role in armed activities against the new government.¹⁵³ The transitional government has not released numbers of or comprehensive details on those it detained, nor was Sharaa's "top list" of wanted individuals ever released.

Most of those reported to have been arrested were relatively minor players in the Assad regime's repression and violence, though many of them undoubtedly have blood on their hands. Yet important exceptions include **Ibrahim Huweija** (not sanctioned), head of AFID between 1987 and 2002, who was involved in the suppression of the 1982 Hama uprising and is suspected of having played a role in the assassination of Lebanese Druze leader Kamal Junblatt in 1977.¹⁵⁴ He is probably the most senior member of the Assad regime in custody, although he had long retired. He was arrested on 6 March 2025 in his hometown of Jableh.¹⁵⁵

Among those detained who also face Western sanctions is Muhamad al-Shaar, the former Interior minister and senior official with the PSD. He handed himself in to the new authorities in December 2024, was released, and then re-arrested. Atef Najib was arrested on 31 January 2025; Mizar Sawwan, an Air Force commander, was captured on 25 June 2025; and **Wassim al-Assad**, one of Bashar al-Assad's cousins involved in the captagon trade, was arrested on 21 June 2025.

153- Examples include Faruq Qasem al-Hamadi, former MP, arrested in Daraa on 27 February 2025, and Madlul al-Aziz, also a former MP and defector of Jabhat al-Nusra, arrested in Damascus on 25 June 2025.— Omar Madaniah, "[Internal Security in Daraa Arrests the Criminal Faruq Qasem al-Hamadi After Surveillance and Investigation](#)" (in Arabic), X post, 27 February 2025; Radio Free Syria, "[Damascus: Security Apparatus Arrests Former Parliament Member Madloul al-Aziz...](#)" Facebook post, 25 June 2025; Zaman al-Wasl, "[Arrest of a Figure Close to Mihrac Ural in Damascus](#)" (in Arabic), Facebook post, 23 June 2025.

154- "[Ibrahim Huwayja, a Syrian Intelligence Officer Accused of Assassinations and Crimes Against Humanity](#)" (in Arabic), Al Jazeera (encyclopedia), 7 March 2025.

155- William Christou, "[Thirteen Syrian Security Officers Killed in Clashes with Assad Loyalists](#)," The Guardian, 6 March 2025.

The transitional government made it clear that it wants Huweija to be among the first to be tried in court. On 31 July 2025, Syria's chief prosecutor issued a statement announcing the start of legal proceedings against Ibrahim Huweija, Atef Najib, Muhamad al-Shaar and **Ahmad Badreddin Hassoun** (not sanctioned), the former Grand Mufti of Syria who was arrested in March 2025 when he tried to flee to Jordan.¹⁵⁷ A few days later the Ministry of Justice released a short video showing an



investigative judge interrogating the four defendants.¹⁵⁸ Wasim al-Assad appeared in another video as he was being questioned (see picture).¹⁵⁹ No statement has been made on what fate awaits these prominent detainees.

A dilapidated judiciary

Many of those arrested since December 2024 have been released, ostensibly because of lack of evidence that they committed any war crimes.¹⁶⁰ Again, the transitional government did not communicate publicly how many were released and under what terms, if any.¹⁶¹ Neither is anything known about where those who remain in custody are being held, under what conditions, or whether they have access to a lawyer.¹⁶² Fadel Abdul Ghani, a Syrian human rights lawyer, claimed in August 2025 that approximately 1,000 had been released and 300 remained under investigation.¹⁶³ But a former regime insider said that thousands had been released and some 4,000 former regime officers and accomplices remained in custody.¹⁶⁴

156- [“Syria Forms Transitional Justice, Missing Persons Commissions,”](#) Reuters, 18 May 2025.

157- [“Start of Proceedings to Try Four Figures of the Ousted Regime in Syria”](#) (in Arabic), Al Jazeera, 31 July 2025; [“Assad’s Mufti’ Ahmed Badreddin Hassoun ‘Arrested’ Trying to Flee Syria for Jordan,”](#) The New Arab, 27 March 2025.

158- Syrian Ministry of Justice, [“Toward Justice... Investigations Under the Oversight of the Judiciary”](#) (in Arabic), Facebook post with video, 0:44, 7 August 2025.

159- Suriya al-Jadida, [“Watch and Delight Your Eyes with the Interrogation of Wasim al-Assad!”](#) (in Arabic), Facebook post with video, 2:45, 30 September 2025.

160- Hassan Soufan, member of the Higher Committee for Maintaining Civil Peace, referring to the release of dozens of former regime officials and soldiers during the Muslim feast of ‘Eid al-Adha, in a statement on 10 June 2025. — Alekhbariahsy, [“Important Clarifications from Hassan Soufan, Member of the Higher Committee for Civil Peace: We Are Working Toward...”](#) (in Arabic), Instagram post, 10 June 2025.

161- As the transitional government failed to give details on who had been freed, Syrian social media and news sites started to draw up lists of former military and security men who were believed to have been released. — Zaman al-Wasl, [“Revealing Severe Violations Against One of the Released Detainees Mediated by Fadi Saqr”](#) (in Arabic), Facebook post, 12 June 2025.

162- Many of those detained are likely held in Adra central prison in Damascus. Some of those detained were released from this prison. — Tayf.fm, [“General Security Releases a Number of Officers and Conscripts of the Ousted Regime from Adra...”](#) (in Arabic), Instagram post, 26 January 2025. — During the Assad years, Adra Prison was regarded as comparatively better than the notorious (now-closed) Sednaya Prison. Nonetheless, it was characterized by severe overcrowding, the mixing of common criminals with political detainees, poor conditions, arbitrary detention, and torture. — Jaber Baker and Uğur Ümit Üngör, [“Syrian Gulag: Inside Assad’s Prison System,”](#) I.B. Tauris, 2023, p. 268–278. — In May 2025 our repeated requests to visit Adra Prison received no positive response, likely because the facility remains fully operational and is presumably not in a condition suitable for outside inspection.

163- Charles Mouhannad Malek, [“Muadh Muhareb... and the Syrian Ikhbariyah, Something We Were Not Used To”](#) (in Arabic), Facebook post, 1 August 2025.

164- Interview with a former regime insider, Beirut, October 2025.

It is impossible to verify these claims. However, the transitional government's contradictory signals—publicly emphasizing arrests and prosecution while quietly releasing detainees suspected of complicity in the Assad regime's crimes—highlight a fundamental dilemma it has not yet resolved. While promising transitional justice and accountability for past regime crimes, the government has simultaneously tried to lower expectations of Assad's henchmen being prosecuted and imprisoned. A government advisor on transitional justice explained that one pressing reason not to expect all those suspected of crimes to be tried is their staggering number, which would overwhelm Syria's judiciary, especially given its dilapidated state: ¹⁶⁵ “The SNHR has been circulating a number of more than 16,000 individuals who need to be tried for crimes under the Assad regime. That is not helpful.”¹⁶⁶



Following decades of neglect and being utilized by the Assad regime to criminalize any form of dissent, Syria's judiciary suffers from a serious lack of capacity, a dearth of qualified judges, rampant corruption, and decrepit facilities. Many senior judicial staff, including judges, were themselves complicit in serious human rights violations, including denying defendants a fair trial and routinely drawing on their confessions extracted under torture. Indeed, some Syrian human rights activists, including former judge and lawyer Haitham al-Maleh, have called for aggressively prosecuting such judges.¹⁶⁷ In June 2025 the transitional government's attorney general ordered the arrest of some twenty judges accused of bribery and corruption during the Assad years, while others were summoned for questioning.¹⁶⁸ Some judges who had been wrongfully dismissed during the Assad years, or who had defected, were reinstated.¹⁶⁹

More generally, the transitional government stated its intention to launch an ambitious judicial reform program.¹⁷⁰ Yet even with ample resources, empowering the judiciary is likely to take many years, and the resources are not there. Meanwhile, the transitional

165- A senior advisor to the transitional government estimated that one million Assad regime officials, accomplices, and helpers were involved, with at least 100,000 responsible for “serious crimes,” and then asked, “How can we send all these people to court?” — Interview with a senior advisor to the transitional government, Damascus, June 2025.

166- Interview with a transitional justice advisor to the transitional government, Damascus, May 2025. On 23 December 2024 SNHR said it had compiled a list of 16,200 individuals involved or implicated in crimes committed by the Assad regime. It proposed to focus efforts to hold them accountable on first- and second-tier senior leadership officials. — SNHR, [“Perpetrators of Crimes Against Humanity and War Crimes Must Be Held Accountable.”](#)

167- Zaman al-Wasl, [“Urgent Call to Prosecute Judges of the Field Court and the Counterterrorism Court in Syria”](#) (in Arabic), Instagram post, 30 June 2025.

168- Zaman al-Wasl, [“Details on the Detention of Counterterrorism Court Judges and the Seizure of Their Assets...”](#) (in Arabic), Facebook post, 17 June 2025.

169- [“Presidential Decree Reinstates 63 Dismissed Judges to Their Positions from the Former Regime Era”](#) (in Arabic), Syria TV, 5 June 2025.

170- Qusay Noor, [“Speech by the Minister of Justice in the New Syrian Government, Dr. Mazhar al-Wais,”](#) X post with video, 2:17, 29 March 2025.

government has reinstated or retained judges who are accused of corruption or involvement in unfair trials during the Assad years.¹⁷¹ There have been instances of HTS members, now comprising the General Security forces, showing disrespect for judges and even assaulting them.¹⁷² Overall, since the fall of the regime, the courts have shown little initiative. They have seldom processed cases involving former Assad regime officials, and when they have, the resulting verdicts have angered many who want accountability for past crimes.¹⁷³

Deals with Assad's henchmen

While insufficient judicial capacities pose a serious obstacle to the effective prosecution of former Assad regime officials and their collaborators, Syria's new leaders also drifted away from their declared policy of transitional justice due to what they described as tactical calculations. In a way, these tactics follow from the way in which HTS seized power.

The success of its blitz offensive at the end of November 2024, leading to the fall of the regime on 8 December, can partly be explained by HTS having already negotiated the surrender of regime troops and militias—under the threat of force, to be sure. That Abdullah Berri in Aleppo and Fadi Saqr in Damascus did not put up a fight are clear examples of pro-regime militias having laid down their weapons in exchange for assurances that they would not be pursued. Talal Makhoul instructed his Republican Guard forces in Damascus to retreat before rebel forces reached the city when he was offered similar guarantees.¹⁷⁴

Following the overthrow of the regime, HTS leaders have continued their engagements with former regime henchmen, this time to consolidate their power. Arguably, such arrangements in the run-up to the regime's collapse also caused the transitional

171- Example: in August 2025, three judges from Raqqa were appointed to a chamber of the Court of Cassation to hear appeals by other judges accused of corruption and other wrongdoing. The three appointed judges allegedly were themselves involved in politically motivated court rulings during the Assad years. — Zaman al-Wasl, [“Protests Against the Appointment of Former Regime Judges to the Court of Cassation”](#) (in Arabic), Facebook post, 15 August 2025; Official Al-Sharqiya Correspondent, [“Three Shabihah Judges of the Former Assad Regime Appointed to a Chamber of the Court of Cassation...”](#) (in Arabic), Facebook post, 15 August 2025; Syrian Revolution Archive, [“For the Ministry of Justice, and Especially the Minister of Justice Mazhar Abd al-Rahman al-Wais”](#) (in Arabic), Facebook post, 15 August 2025.

172- In May 2025 members of the General Security forces reportedly assaulted and briefly detained a judge in Aleppo while he was conducting a murder investigation. Following the release without charges of one of the security officers, crowds hailed him as a hero. The incident prompted loud protests by judges and lawyers. — Aram Ahmad, [“The Person Who Tortured the Judge Was Carried Out of Prison on People's Shoulders...”](#) (in Arabic), Facebook post with video, 0:39, 26 May 2025; Zaman al-Wasl, [“Judge Beaten and Detained in Aleppo by General Security”](#) (in Arabic), Facebook post, 25 May 2025; Zaman al-Wasl, [“Tension in the Aleppo Palace of Justice: Protests and Counter-Demands Following the Assault on a Judge and the Arrest of Tahan”](#) (in Arabic), Instagram post, 26 May 2025; Zaman al-Wasl, [“Note: We Are Referring Here to the Syrian Judiciary as an Institution, Not to a Judge Personally”](#) (in Arabic), Facebook post, 25 May 2025.

173- In April 2025 a judge in Damascus acquitted Major General **Mahmud Younes Ammar** (not sanctioned), a retired senior security official who reportedly admitted to having extorted families of detainees. Ammar is said to have confessed to soliciting bribes as he promised the release of detainees who had died in custody, likely due to torture. The judge released the defendant, citing his “advanced age.” — [“Judicial Scandal: A Former General Accused of Defrauding Families of Detainees Is Released Despite the Confessions”](#) (in Arabic), Shaam Network, 17 April 2025.

174- Nicolas Pelham, [“The Great Pretender: How Ahmed al-Sharaa Won Syria,”](#) The Economist, 5 March 2025.

government to be beholden to these individuals. The prime rationale for cutting deals with some of Assad's henchmen seems to be directed at intelligence gathering—tracing former members of the security apparatus and militias, and neutralizing the threat they may still pose.

In addition, former regime henchmen who cooperate serve as brokers, enabling the transitional government to reach out to other former regime henchmen and their supporters, and persuade them to accept the new government. By March 2025, when it had become clear that the *fallul* were still capable of posing a security challenge, engaging former henchmen took on increased importance in neutralizing the threat of armed Assadists conspiring against the transitional government.



According to a senior advisor to the transitional government, Fadi Saqr (see picture) has played a key role in efforts to find hidden weapons caches, identify *fallul*, engage with them, and subdue the risk that they would cause trouble.¹⁷⁵ That the transitional government had struck some deal to this effect with Saqr from the beginning was not publicly announced, let alone explained. It just became evident when on 6 February 2025 he appeared in public accompanied by transitional government officials in al-Tadamon, the site of the 2013 massacre for which he became notorious. The visit triggered protests by residents, calling for Saqr's arrest and holding up pictures of executed relatives.¹⁷⁶

Subsequently, it transpired that Saqr assisted the Higher Committee to Maintain Civil Peace (HCMP), a body established on 9 March 2025 to improve the government's standing among Alawite communities on the west coast.¹⁷⁷ Saqr became a protégée of one of the committee's members, Khaled al-Ahmad, who also had negotiated the earlier deals with Saqr and others that in December 2024 encouraged pro-regime fighters to lay down their arms.¹⁷⁸

175- Interview with a senior advisor to the transitional government, Damascus, June 2025.

176- [“Fury in Syria as Reconciled ‘War Criminal’ from Assad Regime Visits Site of Tadamon Massacre,”](#) The New Arab, 8 February 2025.

177- [“Presidential Decision to Form a Supreme Committee for the Preservation of Civil Peace,”](#) The Syria Times, 9 March 2025.

178- Khaled al-Ahmad is a childhood friend of HTS leader Ahmad al-Sharaa. Until at least 2018, he served as a security advisor and public relations manager to President Bashar al-Assad. His name appeared in the 2012 leak of emails from Assad and Asma al-Assad, in which he advised the president on managing the uprising and “tightening the security grip.” As the war shifted in the regime's favor, al-Ahmad became involved in the “reconciliation” process launched in 2015 to disarm rebel groups. He also facilitated indirect contacts between the Assad regime and the US government under President Barack Obama, reportedly emphasizing the jihadist threat and arguing that only the regime could prevent state collapse. — Robert Booth, Mona Mahmood, and Luke Harding, [“Exclusive: Secret Assad Emails Lift Lid on Life of Leader's Inner Circle,”](#) The Guardian, 14 March 2012; Nour Malas and Carol E. Lee, [“U.S. Pursued Secret Contacts With Assad Regime for Years,”](#) The Wall Street Journal, 23 December 2015; Rania Khalek, [“The Mystery Fixer Who Is Negotiating an End to the Syrian War,”](#) Consortium News, 4 August 2018; Samia Haddad, [“Meet the Syrian Regime's Trusted Friend,”](#) OpenDemocracy.net, 17 August 2018; Pelham, [“The Great Pretender: How Ahmed al-Sharaa Won Syria.”](#)

During the violent clashes in March 2025, Saqr arbitrated between the government and families of detainees from the coastal area, applying his connections to reduce tensions. Ostensibly to appease Alawite grievances, the transitional government released dozens of detainees following Saqr's mediation efforts. At the end of the month Saqr appeared at Hmeimim airbase, reassuring Alawite civilians that it was safe for them to return to their homes.¹⁷⁹

Saqr's rising prominence as the transitional government's de-facto interlocutor with former regime henchmen and the Alawite community caused broad and growing uneasiness among those who insisted that regime henchmen be held accountable. Many Alawites also felt that a war criminal could hardly be the ideal candidate to speak on behalf of their community.¹⁸⁰ The government's silence on Saqr's role sparked speculation as to why it appeared to shield him and others from prosecution. Asked in early June 2025 whether the government had considered publicly explaining its policies involving Saqr if it thought these were justified, a senior advisor responded dismissively.¹⁸¹ Yet on 10 June, one of the members of the HCMP, Hassan Soufan, held a press conference to clarify the committee's approach. Soufan stated that "people like Fadi Saqr play a role in untangling complex issues, resolving problems, and addressing the dangers facing the country. We understand the pain and anger felt by the families of the martyrs, but in the context of civil peace, we are compelled to make decisions that ensure relative stability in the coming phase."¹⁸² He added that Saqr had been given "safety assurances by the Syrian leadership" and that such assurances "had significantly contributed to preventing further bloodshed."

The attempt to justify the transitional government's policy backfired. Syrian social media lambasted what was seen as implied impunity for the Assad regime's henchmen. Lawyers' organizations, including the Homs Bar Association, pointed out that pardoning war criminals is illegal and condemned Soufan's statement as "a provocation to the victims and their families."¹⁸³

The question remains whether Fadi Saqr and other former regime henchmen will still await trial when their supposed usefulness as mediator or bridge to the Alawite community ends, if indeed it ever does. A senior government advisor emphasized that

179- Ogheid Abu Zaid, "[Damascus Sends Fadi Saqr to Convince the Displaced in Hmeimim to Return to Their Areas... What Happened?](#)" (in Arabic), 7al.net, 23 March 2025; Naser Al-Naser, "[Fadi Saqr to #Hmeimim!!](#)" (in Arabic), Facebook post, 22 March 2025.

180- Critical Alawite voices strongly opposed Assad-regime figures such as Fadi Saqr turning into representatives of their community. See, for example: commentary by Nayouf (as circulated in a Facebook video), Zarqa, and Mustafa; Waseem Ezio Auditore, "[Summary for everything that has been happening on the coast for 10 months...](#)" (in Arabic), Facebook post with video, 4:26, 20 October 2025; Ibrahim Zarqa, "[The Alawites in Syria: A Community on the Edge of Rupture](#)" (in Arabic), aljumhuriya.net, 19 September 2025; Rania Mustafa, "[In Defense of Fadi Saqr](#)" (in Arabic), Al Arabiya, 15 June 2025.

181- "It's just a tactic. The government is not obliged to say anything about this. We can handle it when people criticize the government." Interview with a senior advisor to the transitional government, Damascus, June 2025.

182- alekbaryahsy, "[Important clarifications from a member of the Higher Committee for Civil Peace, Hassan Soufan...](#)" (in Arabic), Instagram post with video, 10 June 2025.

183- Mazen Gharibah, "[Statement of the Bar Association in Homs – Transitional Justice and Human Rights Committee, regarding the press conference of the Higher Committee for Civil Peace...](#)" (in Arabic), Facebook post, 10 June 2025.

Saqr “will still face a fair trial, but his good deeds now can help him reduce his sentence.”¹⁸⁴ In an interview with the New York Times, Fadi Saqr denied he had committed any war crimes, arguing that the fact that the transitional government is working with him suggests that it holds no evidence against him.¹⁸⁵ He noted that “I will submit myself to whatever the judiciary decides” [under] “proper legal procedures.”

Time will tell how the inherent contradictions in the transitional government’s tactics to preserve “civil peace” while at the same time pledging to hold Assad’s henchmen to account will play out. If Saqr’s role as broker will fail to thwart a growing insurgency against the transitional government or an escalation of sectarian tensions, he will continue to be needed. From this perspective, one could even argue that he ultimately has a vested interest in fomenting such tensions. If, on the other hand, he significantly helps to improve relations between the transitional government and Alawites at large, the transitional government will have unwittingly boosted Saqr’s standing in that community.¹⁸⁶ The latter suffers from a clear void in leadership, especially since the fall of the Assad regime. Both scenarios would work against Saqr being prosecuted for the crimes he committed during the Assad years. Meanwhile, Saqr’s assets—such as in Desert Falcon Ltd and perhaps other companies—are not known to have been seized or liquidated (see Appendix 2).

In his press statement, HCMP member Hassan Soufan made it clear that Fadi Saqr is not the only former regime henchman the transitional government has courted for pragmatic reasons.¹⁸⁷ Yet details are sketchy as to which other individuals affiliated with the former regime turned into interlocutors or informants in return for immunity. It is rumored that **Nidal al-Hassan** (“Abu Ali”, not sanctioned), from the town of Suran in the Hama countryside, has been providing services to the government’s General Security forces in Tartous, accompanying them in meetings with the city’s dignitaries in efforts to promote reconciliation.¹⁸⁸ Al-Hassan is alleged to have assisted Assad’s intelligence agencies and pro-regime militias in the arrests and assassinations of anti-regime activists. We were unable to confirm these claims.

That the transitional government is not acting against **Imad Abu Zureiq** (sanctioned for his role in the captagon trade) does not necessarily mean that he was granted “reconciliation,” but it can still be viewed in the context of the transitional government’s efforts to affirm its control over the border area with Jordan. Others,

184- Interview with a senior advisor to the government, Damascus, June 2025.

185- Erika Solomon and Reham Mourshed, “[A Syrian Committee for Civil Peace Angers Those Demanding Justice](#),” The New York Times (subscriber-only content), 11 June 2025.

186- Yassin al-Sweiha notes in this context — “Does ‘transitional justice’ in the model of the new Syria mean that the only Alawites whose lives and dignity are respected, whose granted security is maintained, and whom the authorities see, address, and engage with politically are Fadi Saqr and Khaled al-Ahmad, Sheikh Soufan’s colleague on the committee?” — Yassin al-Sweiha, “[Hassan Soufan Was Not Wrong, But...](#)” (in Arabic), aljumphuriya.net, 11 June 2025.

187- “We are committed to cooperating with any individual who meets specific criteria – not everyone qualifies. These criteria are the ability to preserve blood and to enhance civil peace. Providing safety assurances to certain individuals has significantly contributed to preventing further bloodshed. — “alekbaryahsy, “[Important clarifications from a member of the Higher Committee for Civil Peace, Hassan Soufan...](#)” (in Arabic).

188- Zaman al-Wasl, “[The former Syrian regime was not a sign...](#)” (in Arabic), Facebook post, 26 April 2025.

including Talal Makhoul, **Haydra Bahjat Suleiman** (not sanctioned),¹⁸⁹ **Safwan Bahloul** (not sanctioned),¹⁹⁰ and Amru Armanazi (sanctioned) all seem to have struck deals with the transitional government principally in return for providing information on a host of sensitive issues, including the whereabouts of fugitive leaders of the Assad regime, the kidnapping of US journalist Austin Tice, and past activities of the SSRC.

“Light justice”

Transitional justice entails far more than taking perpetrators to court; its commonly understood meaning is associated with “a society’s attempts to come to terms with a legacy of large-scale past abuses, in order to ensure accountability, serve justice, and achieve reconciliation.”¹⁹¹ Its components include criminal justice, truth-telling, reparations, vetting, and more. While Syria should decide for itself how it will balance these components, it should do so inclusively and transparently. It is too early to say what the TJC and NHCMP have accomplished thus far, as they have only been in place for a few months. Yet prosecuting Assad’s henchmen and holding them to account for the mass suffering they caused needs to be an integral part of a genuine transitional justice process.

Syria’s new leaders stressed as much when they put an end to more than 60 years of authoritarian Baathist rule. Yet the current record thus far falls significantly short in terms of transparency and inclusivity. Neither has the transitional government yet managed to mitigate the glaring contradiction in its simultaneous pursuit of “civil peace” and accountability, much to the latter’s detriment. Judging from the public outcry over Fadi Saqr’s role alone, many Syrians have acutely registered this.

The new decision-makers seem to be aware that their efforts to achieve accountability, especially of the Assad regime’s henchmen, have been inadequate. In response, they tried to temper public expectations, underscored the real obstacles that stand in the way of prosecutions, and emphasized the virtues of their engagement with former perpetrators of mass violence. In private, some government officials argued that, for them, transitional justice is by necessity a form of “light” or “mitigated” justice

189- Haydra Suleiman is the son of the late Bahjat Suleiman, the former head of the GID. He reportedly provided the interim authority with details on the whereabouts of senior Assad regime officers. During the Assad years Hydra Suleiman was a fervent supporter of the regime, once justifying its violence by proclaiming that “the land is ours, and the barrel bombs are ours.” In May 2025 the Ministry of Communications and Information Technology hosted a conference, “Nahda Tech,” that was sponsored by Hawi Information group, a company that is part of UAE-based International Mediation Group (AWI). Hydra Suleiman serves as its Syria country director. — Sada 24, “[Haydra Suleiman revealed the location...](#)” (in Arabic), Facebook post, 11 January 2025; “[Bahjat Suleiman: The Shadow of the ‘Missing Dictator’](#)” (in Arabic), Al-Araby Al-Jadeed, 26 May 2014; Feras Dalatey Sr., “[For the attention of the Syrian Ministry...](#)” (in Arabic), Facebook post, 10 May 2025.

190- Safwan Bahloul, a general in the GID’s External Intelligence Branch and involved in the capture of US journalist Austin Tice, reached a settlement with the transitional government, reportedly in return for providing information on Tice, whom he interrogated in 2012 — “[Shining Light on America’s Missing Man in Syria](#),” The Economist, 11 June 2025; “[Former Syrian Official Reveals New Details About the Disappearance of American Journalist Austin Tice: Assad Was Aware of the Kidnapping](#)” (in Arabic), Yalla News, 12 June 2025; Clarissa Ward and Sarah El Sirgany, “[The Road That Led, 13 Years Later, to Hearing: ‘Austin Is Dead’](#),” CNN.com, 28 October 2025.

191- Pablo de Greiff, “Theorizing Transitional Justice,” in [Transitional Justice](#), ed. Melissa S. Williams and Jon Elster (New York University Press, 2012), p. 31.

(*al-'idala al-mukhafafa*) that prioritizes truth-telling and aiding victims over prosecutions.¹⁹² They referred to historical examples elsewhere, from Nuremberg to Chile and Brazil, where effective prosecution of perpetrators was piecemeal or took a long time to materialize as pragmatic considerations prevailed.¹⁹³ Another government advisor appeared to argue something similar: “At the moment we don’t focus on criminal culpability. Transitional justice is about the process, not all about the outcome.”¹⁹⁴

Even so, by showcasing several prominent defendants as they were led to an investigative judge, the transitional government seems keen to convey a message that it is earnest about its promises to pursue accountability. Such symbolism, while not without merit, is not going to placate Syrians’ call for justice, even when it eventually may become apparent that not all of Assad’s henchmen can be sent to prison.

Without a real and working system of accountability, revenge killings will likely increase. Numerous cases of such violence since the collapse of the Assad regime suggest that some will take justice into their own hands when the transitional government’s justice efforts are perceived as flawed.¹⁹⁵ The mechanisms underlying individual or collective violence against Assad regime perpetrators are complex and entwined with sectarianism, renewed mobilization by the *fallul*, security forces’ own involvement in summary executions, and government control. Yet it is safe to assume that a failure to achieve justice serves as a strong motivation for extrajudicial killings and vigilantism. It is here where the transitional government’s justification for its dealmaking with Assad’s henchmen, presented as necessary to uphold civil peace, crumbles.

Holding Assad’s businessmen to account

When HTS overthrew the regime, it set out to map Assad and his cronies’ assets and to engage with the businessmen who propped up his rule and helped facilitate repression. Tellingly, the approach toward the country’s business class has largely been pursued separately from the transitional justice framework the government devised for Assad’s henchmen. In taking this compartmentalized approach, the government appears to contravene the “corporate turn” in transitional justice worldwide, which has pushed toward treating economic actors on an equal footing with armed perpetrators in holding both accountable for past abuse.¹⁹⁶ Ten months into

192- Interviews with senior advisors to the transitional government, Damascus, May, June, and July 2025.

193- A similar argument is made by Yassin al-Sweiha: “Not a single ‘success story’ of this concept is without examples of dozens, or hundreds, or even millions of victims feeling anger at the impunity of some criminals, or many of them, in exchange for ensuring that they do not threaten a fragile political process or a critical social situation.” Al-Sweiha also argues that choices leading to impunity for some may be inevitable, yet these are not to be made by Syria’s transitional government, whose powers are merely transitional or temporary. — al-Sweiha, “[Hassan Soufan Was Not Wrong, But...](#)” (in Arabic).

194- Interview with a senior advisor to the transitional government, Damascus, May 2025.

195- See “[Revenge Killings Targeting Assad Regime Affiliates \(December 2024–May 2025\)](#),” Syria Justice and Accountability Centre (SJAC), 22 May 2025; “[Are You Alawi?: Identity-Based Killings During Syria’s Transition](#),” Human Rights Watch, September 2025.

196- Line Jespersgaard Jakobsen, “[The Emerging Corporate Turn in Transitional Justice](#),” Cooperation and Conflict (Sage Journals), vol. 58, no. 4 (subscriber-only content), 15 March 2023, pp. 561–571.

the new Syria's transitional justice process it is becoming more and more apparent that pressing economic rationales are taking precedence over justice.

While Syria's dismal economic conditions may be argued to necessitate a pragmatic approach toward businessmen providing employment and essential services, the government has adopted an approach that is grossly non-transparent, not carefully applied, and shrouded in questionable justifications. The government's engagement with Assad's businessmen also risks jeopardizing efforts to clearly break with Assad's cronyism. Together, a corporate justice approach is emerging that, first and foremost, falls short in meeting what victims of the Assad regime can reasonably expect from their new government. The prevailing approach is also increasingly incompatible with sanctioning states' objective to hold the regime and its business accomplices to account.

The "Economic Committee"

As soon as the Assad regime was removed from power, a group of men linked to HTS set up base in the Four Seasons hotel in Damascus to run an ad hoc committee charged with tracing the assets of Assad's high-profile businessmen and disentangling the intricate networks of companies, cronies, and fronts that had helped the regime to stay in power for years. This "Economic Committee" soon moved to former offices deserted by Yassar Ibrahim, Assad's fronts manager, where it drew on the regime's meticulous bookkeeping to run its corrupt business sector. Ibrahim's accountants and other staff were ordered to cooperate and to provide as many documents and as much information about the regime's network of companies and businessmen.¹⁹⁷ Since then, the Economic Committee has orchestrated a complex effort in appropriating and restructuring assets. As importantly, it has tried to persuade some of Assad's businessmen to accept a settlement wherein they could keep at least part of their assets in exchange for returning to Syria, allegedly without being prosecuted.

Despite its important mandate, the committee lacks a clear legal basis, and it was never announced or acknowledged by the transitional government. Government representatives did tell New Lines Magazine that the committee was established by a formal presidential decree.¹⁹⁸ Yet that decree seems to refer to another, separate committee.¹⁹⁹ The status of the Economic Committee and the nature of its activities remain largely opaque, even when their significance to transitional justice concerns appears to be enormous.

There is no formal account or acknowledgment of who sits on the Economic

197- Interview with a former employee of Yassar Ibrahim, Damascus, July 2025.

198- Kareem Shaheen, "[Balancing Fairness and Stability in Syria's Political Transition](#)," New Lines Magazine, 31 July 2025.

199- The transitional government representatives cited by New Lines Magazine seem to refer to Presidential Decree 13 (4 April 2025), which established the "Committee to Combat Illicit Gains." — Tartous Qit'at Min al-Rouh, "[The Presidency announces the formation...](#)" (in Arabic), Facebook post, 16 June 2025. — The date of Presidential Decree 13 is later than the start of activities of the Economic Committee, and the committee members listed in the decree differ from those mentioned by individuals who interacted with the Economic Committee. — Interviews with transitional government advisors, businessmen, and accountants in Damascus, May–June 2025.

Committee, which further accentuates concerns about its own accountability. But following an investigation by Reuters and confirmed by numerous sources, a few names have been suggested.²⁰⁰ The Economic Committee appears to be led by Abraham Succarieh (known by the nom de guerre Abu Mariam al-Australi), an Australian national of Lebanese descent who was placed under Australian sanctions for alleged terrorism financing. He is believed to report to Hazem al-Sharaa—the older brother of President Ahmad al-Sharaa, who often accompanies the president on official visits abroad even when he does not hold a formal position in the transitional government. In 2018–2019, Hazem was an agent for PepsiCo in Erbil (northern Iraq).²⁰¹ Other Committee members include Abu Abdul Rahman al-Zirbeh (whose real name is Mustafa Qadid), a former HTS commander and “emir” of Aleppo, along with Abu Ja’afar al-Idlibi and Abu Qatl al-Qanuni, who are known only by their nicknames.

When the Economic Committee set out to survey Assad’s business empire, Syria’s Central Bank on 23 January 2025 issued a circular instructing banks to impose a “preventive asset freeze” on all companies and individuals affiliated with or connected to the Assad regime.²⁰² As the government did not provide names or define criteria to identify whose bank accounts had to be frozen, it created some confusion.²⁰³ However, the blunt measure did allow the Economic Committee to buy time for its fact-finding tasks.

Furthermore, the Central Bank issued separate directives to freeze the assets of some of Assad’s major businessmen, including the Qatarjis. To further prevent Assad’s businessmen from quickly changing ownership of their companies—for instance, by appointing new frontmen—the transitional government shut down the country’s commercial registry for months. On 3 July 2025 the blanket asset freeze on businessmen suspected of links to the Assad regime was lifted. By that time, the Economic Committee had made some important progress in dealing with Assad’s businessmen as it saw fit.

Deals with Assad’s businessmen

The Reuters investigation suggests that the Economic Committee saw itself as facing a fundamental dilemma.²⁰⁴ It could seize all assets of Assad’s businessmen and nationalize their companies to the benefit of the state. Yet such an approach would be

200- Timour Azhari and Feras Dalatey, “[Special Report: Syria Is Secretly Reshaping Its Economy. The President’s Brother Is in Charge](#),” Reuters, 24 July 2025; Abdullah Suleiman Ali, “[The Mysterious Man in Damascus: Who Is ‘Abu Maryam al-Australi,’ Who Leads the Policy of Forgiveness?](#)” (in Arabic), An-Nahar, 14 July 2025; Interviews with transitional government advisors, businessmen, and accountants, Damascus, May–July 2025.

201- Hazem Al Charra, “[Experience](#),” LinkedIn, accessed 1 November 2025.

202- “[To Freeze Accounts Linked to the Assad Regime... the Syrian Central Bank Issues a New Circular](#)” (in Arabic), Al-Araby, 23 January 2025; “[Syria Lifts Precautionary Freeze on Assets of Prominent Businessmen](#),” zamanalwsl.net, 3 July 2025; “[Liquidity Shortages Stir Confusion in the Banking Industry](#),” The Syria Report (subscriber-only content), 29 January 2025.

203- “[Former Regime-affiliated Businessmen Seek to Save Their Businesses](#),” The Syria Report (subscriber-only content), 4 February 2025.

204- Azhari and Dalatey, “[Special Report: Syria Is Secretly Reshaping Its Economy. The President’s Brother Is in Charge](#).”

reminiscent of Ba'ath party's heyday in the 1960s when it nationalized private property under the Ba'ath party's heyday of its "Arab socialism." It would scare off investors that the new Syria needs more than ever. On the other hand, taking each Assad-linked businessman to court would be an arduous and time-consuming process that would overwhelm Syria's judiciary. This left the option of striking quid pro quo deals with these businessmen, allowing them to retain part of their assets in exchange for remaining in, or returning to, Syria.

Details of how such deals were negotiated emerged, especially involving Muhamad Hamsho, the businessman whose militias stripped valuable metals from destroyed houses to feed his lucrative scrap metal business. Arguably, the Economic Committee intended to present Hamsho as an example to all other businessmen to induce them to enter similar negotiations over their own future.

Hamsho was eager to negotiate. He is not known to hold major foreign assets but owns mostly immovable assets in Syria. Without his intimate relationship with Maher al-Assad and the Fourth Division, he would not have been a major business player in the first place. Now that his former patrons were gone, he would have to contend with being allowed to continue his business even if this implied being stripped of a significant part of his assets. All of this gave important leverage to the Economic Committee to force Hamsho into a deal and demonstrate to other businessmen that it was serious about enticing them to return to Syria.

The negotiations were mediated by Mousa al-Omar, a London-based Syrian journalist and former TV presenter, and resulted in Hamsho reportedly handing over around 80 percent of his assets, valued at USD 640 million, leaving him with USD 150 million.²⁰⁵ However, these amounts exclude sizable assets and companies Hamsho had put in his relatives' names over the years as a safety measure against Assad's erratic approach to his business allies. In all, for Hamsho—who risked losing everything—the deal was more than worth it.

205- Azhari and Dalatey, "[Special Report: Syria Is Secretly Reshaping Its Economy. The President's Brother Is in Charge](#)"; interviews with transitional government advisors, Damascus, May–July 2025.

The transitional government deftly presented the negotiations and then the deal with Hamsho as a pragmatic step tackling Assad's legacy and benefiting Syria at the same time. Following months of rumours about the deal-making involving Hamsho, his two sons appeared as generous donors in a televised fundraising campaign for a Syrian Development Fund "dedicated to rebuilding Syria and securing a prosperous future for all Syrians" (see picture).²⁰⁶



Meanwhile, negotiations were held with other businessmen who wanted to turn the page and resume running their companies in Syria. Some of them made overtures to this effect in public statements and open letters to President Sharaa, mostly arguing that they had been forced into doing business with a regime they never approved of, that they themselves had suffered substantial losses and damages as a result, and that they now extended a warm welcome to the new government.²⁰⁷ Their public statements notably fell short of an apology, let alone a stated willingness to compensate their victims. This prompted some to mockingly note that "When Bashar al-Assad was in power, the saying was: 'The President is good, but those around him are thugs.' But now it is: 'We are good, but the President was a thug.'"²⁰⁸

Subsequently, deals were struck with a host of businessmen, presumably along the same formula applied to Hamsho. Scant detail emerged about exactly what these deals entailed. Prominent and sanctioned businessmen, who had reportedly reached an arrangement with the transitional government or who were still in the process of negotiating one, included Bilal al-Na'al, **Fahad Darwich**, **Issam Shammout**, **Khaldoun al-Zu'bi**, **Khaled Qaddour**, **Tarif al-Akhras**, and **Samer Foz** (see Appendix 1). Yet many others continued to operate their companies in Syria (see below) and/or were seemingly left untouched, thereby suggesting that they reached a deal as well.

Some were inexplicably given no priority and left off the hook. This seems to apply to **Abdellatif Hamideh**, **Ali Najib Ibrahim**, **Anas Talas**, **Issam Anbouba**, **Khalid Bassam al-Zubeidi**, **Mahmoud al-Dj**, **Mazen al-Tarazi**, **Muhamad Nazer Jamal al-Din**, **Wassim Anwar al-Qattan**, and **Ra'if al-Quwatli** (see Appendix 1).

206- "[Home Page](#)," Syrian Development Fund, accessed 1 November 2025. — The screen behind the presenters mentions Ahmad and Amr Hmisho as having donated USD 1 million. On 20 September 2025, the Ya'four resort donated another USD 1.1 million; the resort is owned by Hmisho Group led by Muhammad Hamsho. — Haid Haid, "[Hmisho Donations Revive Questions About the Fate of Assad's Cronies](#)," Al Majalla, 4 October 2025.

207- See for example the six-page public letter by Tarif al-Akhras dated 14 January 2025: "[A Letter from Businessman Tarif al-Akhras to the Leader of the New Syrian Administration](#)" (in Arabic), Al-Iqtisadi Syria, Facebook post, 14 January 2025.

208- Interviews with Syrian businessmen, Damascus, March 2025.

Finally, negotiations with some other prominent businessmen appear to have failed or are currently on hold. The Qatarjis reportedly refused to accept the terms set by the Economic Committee. From Beirut they complained bitterly about “the theft” of their assets and companies as these were seized by the government and placed under new management.

Rami Makhlouf claimed there had been negotiations between him and the transitional government, but no agreement had been reached because the government’s negotiators were, as he put it, “full of greed.”²⁰⁹ He tried to bargain for better terms by leveraging his supposed prominence among Alawites on the west coast against the background of the clashes and massacre in March 2025. Yet the idea fell on deaf ears.

The transitional government did not comment explicitly on or refer to any of the negotiations involving businessmen other than Hamsho.

Liquidating, restituting, and restructuring sanctioned companies

As the Economic Committee dissected the convoluted networks of Assad’s businessmen and negotiated deals with some of them, it took a disjointed and selective approach to their companies.²¹⁰ Some companies were liquidated. A few, having been seized by the regime’s business allies, were returned to their original owners. For some, a custodian was appointed after their boards of directors were dissolved. Others underwent more complex forms of restructuring. However, many sanctioned companies continued business as usual without any significant modifications.

These variations notwithstanding, what the Economic Committee’s approaches had in common was that they were applied without much transparency or even pursued in secrecy. In some cases, the measures did not bring about fundamental changes to sanctioned companies’ ownership and management. At no point did the transitional government or the Economic Committee explain or justify its decisions at any length, nor present its approach to Assad’s corporate legacy as being an integral part of its stated transitional justice objectives. As such, the government’s approach conflicted with sanctioning states retaining their designations to hold the regime and its business accomplices to account.

The Economic Committee set out to liquidate a number of companies that were closely associated with the Assad regime. One of them is **Al-Fadel Exchange and Money Transfer Company**, which was placed under US sanctions for providing financial services to the regime and Hezbollah, including money laundering. The company was dissolved and its license withdrawn. Its owners, the Balwi brothers, are believed to have left Syria. Another company dissolved was Emma Tel, owned by Khodr Ali Taher,

209- The Syrian Observatory, “[Peace and God’s mercy be upon you. Today I will reveal...](#)” (in Arabic), Facebook post, 28 May 2025.

210- Details on specific sanctioned companies and those owned by designated businessmen can be found in Appendix 2.

who had already left Syria for the UAE in early 2024, but is believed to still visit Syria. Some companies that had been seized by the Assad regime were returned to their rightful owners. One example is **Syrian Modern Cables**, which was confiscated in 2016 from its owner, businessman **Imad Ghreiwati**. He had earlier been placed under EU sanctions but was delisted in 2012. Although the regime alleged at the time that Ghreiwati had failed to repay sizable bank debts, the seizure appears to have been prompted by his refusal to support the regime, specifically to help finance its militias.²¹¹ Ghreiwati subsequently left Syria for the UAE, resigning from his position as president of the Federation of Syrian Chambers of Industry and the Damascus Chamber of Industry. With his departure he was forced to sell Modern Cables to Samer Foz—then being groomed by the Assads as one of Syria’s new business tycoons—at a heavily reduced price. In February 2025 the company and other assets were returned to Ghreiwati.²¹²

The restitution of companies to businessmen expropriated by the regime, however, has thus far been rare. The transitional government has shown more initiative in this respect when it comes to the restitution of real estate or housing seized or stolen during the Assad era, including from businessmen who stood accused of supporting the opposition.²¹³ Yet like the government’s policies toward Housing, Land, and Property (HLP) more generally, its approach was found to have been fragmented and lacking a cohesive rights-based vision.²¹⁴

The Economic Committee installed a legal guardian to take control of several companies that are sanctioned as entities or owned by sanctioned businessmen closely linked to the Assad regime. It did so for the **Hadid Metal Manufacturing Company** after seizing it from Muhamad Hamsho as part of the wider deal struck with him, under which he retained some of his other assets.

Mobile phone network operator **MTN** was also placed under legal guardianship and many of its employees were dismissed. Most of its shares were held by Yassar Ibrahim and his sister Nisreen, through Tele Invest and fronts. As MTN was restructured, they lost control over both companies. However, it is unclear whether MTN is still managed by the legal guardian appointed by the Economic Committee, or by Tele Invest’s official director, who has held this position since 2018.

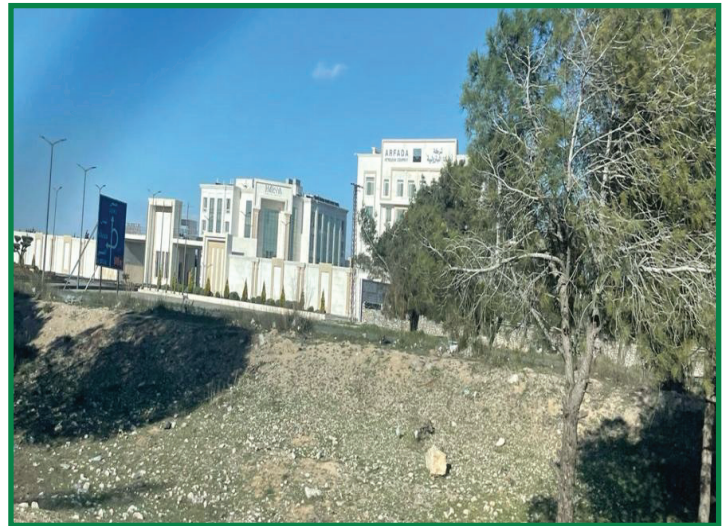
211- [“The Regime Pursues Imad Ghreiwati to Dubai to Seize His Assets”](#) (in Arabic), zamanalwsl.net, 12 October 2017.

212- [“Government Reshuffles Chambers of Commerce,”](#) The Syria Report (subscriber-only content), 15 April 2025; Ghasoub Abboud, [“The Syrian Ministry of Finance Lifts the Precautionary Seizure on Businessman Issam Ghreiwati and His Family”](#) (in Arabic), Yalla Syria News, 21 June 2025.

213- [“Justice and Finance Ministry Decisions Reveal Selective Approach to Property Restitution,”](#) The Syria Report, 15 July 2025.

214- For this report we were unable to explore the complex issues involving HLP. For a thorough analysis and critique of the transitional government’s HLP policies see Mazen Ezzi, [“Delayed Justice: How Syria’s Transitional Administration Is Managing HLP,”](#) The Syria Report, 8 September 2025.

Syriatel, another major mobile phone network operator, had been part of “The Group” led by Yassar Ibrahim through numerous fronts. It was reportedly placed under the control of the Economic Committee, as one of its members was appointed as the company’s legal guardian or authorized signatory. HTS-affiliated telecommunications companies, formerly active only in northwest Syria, then merged with Syriatel. The



company’s executive director, in place since 2021, remained in his position. It is unclear what other shareholders, if any, retained their stake in the company.

Most of the Qatarjis’ companies were seized and placed under a legal guardian. Some of the companies formerly owned by Qatarji, like Arfada Petroleum in Homs Industrial City (see picture above), appear to be inoperative. Also companies owned by Samer Foz were seized after he reportedly reached a deal in which he handed over 80 percent of his assets in Syria. The boards of directors of **Al-Aqila Takaful Insurance** company and **Cham Islamic Bank**—both connected to influential businessmen under the Assad regime—were also dissolved. It is unclear to whom or what their assets were transferred.

The restructuring and renaming of **Cham Wings**, a private airline in which Rami Makhoul once held shares, has been particularly murky, and perhaps deliberately so. Under the management of Muhamad Issam Shammout (also designated) the airline



used its flights to engage in the transfer of Syrian mercenaries, arms smuggling, narcotics trafficking, and money laundering. In early 2020, coinciding with the growing rift between the Assad regime and Rami Makhoul, a UAE-registered company, **Rawdat al-Rif**, owned by UAE national **Nawaf Muhamad Mahdi al-Hamid al-Hashimi**,²¹⁵ bought itself into Cham Wings, although it is not clear to what extent. As Makhoul was being pushed out of Cham Wings, Shammout still held the 45 percent of company shares that were registered in his name.²¹⁶

It is against this background that the Economic Committee started to restructure the company in what turned out to be a convoluted and opaque process. According to

215- “[Rawdat Al-Reef Project Management LLC](#),” The Syria Report (subscriber-only content), 17 April 2025.

216- Some believe that Shammout at this point was forced into a partnership with Yassar Ibrahim. — “[‘Fly Sham’ Is a New Front for ‘Cham Wings’](#)” (in Arabic), Ultra Syria, 13 May 2025; Musab al-Mujbil, “[Yassar Ibrahim: Treasurer of ‘Assad’s House of Money’ and the Head of Syria’s Economic Mafia](#)” (in Arabic), Al-Estiklal, 2021; Sham TV, “[‘Fly Sham’ is in fact ‘Cham Wings’...](#)” (in Arabic), X post, 14 May 2025.

investigative journalism platform Siraj/Daraj, Cham Wings was first sold in March 2025 to the **Syrian Commercial Consulting Company (SCCC)**.²¹⁷ We found a company of that same name that was established in 2009 and is co-owned by **Muhamad Mu'taz Abdullah Sukariya and Dana al-Saman**.²¹⁸ Yet by the end of March 2025 Cham Wings was mentioned in a court ruling approving the sale of the company to Rawdat al-Rif and a similarly named Syrian subsidiary, no longer mentioning SCCC. Shammout is said to have formally transferred his shares to Rawdat al-Rif's Syrian subsidiary, turning that company into the airline's full owner. In May 2025 Cham Wings was renamed Fly Cham.²¹⁹

Fly Cham told Daraj it was "a completely new company and one of our first investments as an Emirati group of companies in Syria."²²⁰ Yet the way in which the restructuring and renaming occurred raises suspicions that Shammout retained at least part of his shares, that the company's ownership did not in fact change substantially, and that the intervention by SCCC served to obscure these continuities in order to circumvent the EU and US designations. According to an investigation by Reuters, the wider deal with Shammout entailed him giving up nearly half of his shares in the airline (retaining some 22 percent), paying USD 50 million and handing over two aircraft to state-owned Syrian Air.²²¹ Shammout kept his car importing business, Shammout Auto (see picture on page 63).²²²

Fly Cham was registered under the same commercial registration number as Cham Wings. Shammout reportedly stayed on as Fly Sham's CEO, as did most of Cham Wings' staff. However, since then he has not made a public appearance. Fly Cham continued operating the same four aircraft. On 30 June 2025, the US Department of the Treasury announced that it retained sanctions on Cham Wings and Issam Shammout without mentioning Fly Cham.²²³

Business as usual

Given the lack of transparency, it is difficult to state with certainty which sanctioned companies linked to the Assad regime continued operating without any restructuring or changes to their ownership. We were able to identify nine designated companies that continued business as usual without any known changes to their corporate configuration (see Appendix 2). There are likely many more.

217- Basel al-Hamdo, Muhamad Bassiki, Ahmad Haj Bakri, and Ali al-Ibrahim, "[Flying Under the Radar: The Hidden Details of the Quiet Takeover of 'Cham Wings,' a Company Under International Sanctions, with Government Approval](#)" (in Arabic), Daraj Media, 28 July 2025.

218- "[Muhamad Moataz Abdullah Sukkariyeh](#)," manhom.com profile, accessed 1 November 2025; "[About Sokaria Law Firm](#)," sokaria-llf.com, accessed 1 November 2025.

219- Syrian Official Gazette, no. 25, 22 May 2025.

220- al-Hamdo et al., "[Flying Under the Radar](#)" (in Arabic).

221- Azhari and Dalatey, "[Special Report: Syria Is Secretly Reshaping Its Economy. The President's Brother Is in Charge](#)."

222- Shammout Auto, "[Together for building the new Syria...](#)" (in Arabic), Facebook post, 12 December 2024. The picture shows a Facebook post by Shammout Auto a few days after the fall of the Assad regime. Headlined "together rebuilding the new Syria," it offers special deals and free services for military vehicles. — Except for an aluminum factory that was seized, it is unclear what happened to Shammout's many other companies.

223- US Department of the Treasury, "[Treasury Implements President's Termination of Syria Sanctions](#)," Press Release, 30 June 2025.

Five of the companies we identified operate exclusively from Syria, three from Syria and a foreign country (Lebanon, the UAE, and Libya), and one from the UAE. This suggests that in addition to subjecting several sanctioned companies to only superficial rearrangements, the transitional government failed to see Western designations as an imperative to take companies and their owners to account for their support of the Assad regime.

Some companies that continued operations after the fall of the regime did so under a different name. One example is **al-Adham Exchange**, which changed its name to **Du Exchange** after being designated, without any change to its ownership. In addition, sanctioned regime businessmen still hide their stakes in companies using fronts, although it is impossible to establish to what extent.



Many designated companies not only persisted, but have been eyeing fresh business opportunities in the new Syria. Projected growth of Syria's GDP is still set at a modest one percent for 2025,²²⁴ but major reconstruction and returning refugees are expected to boost the economy. One example of a designated company that has already seized on new profitable ventures is Al-Dj Group, owned by Mahmoud Abdulilah al-Dj. Shortly after the fall of the Assad regime, the company's Facebook profile showed the new Syrian flag with the words "Free Syria."²²⁵ It posted pictures of street-cleaning efforts purportedly initiated by the company as if to celebrate a clear break with the past.²²⁶

In early June we visited the company's office in the Industrial free zone in Damascus and found it to be open for business and fully staffed. Al-Dj also gave an interview to the state-owned Al-Thawra newspaper, presenting himself as an investor in renewable energy.²²⁷ Yet the company resuscitated its past involvement in aviation as Syria's air travel industry braced itself for the arrival of many refugees and emigrants visiting or returning home, especially from Europe.²²⁸ Al-Dj Group seized on a lucrative opportunity through a complex network of companies and partners.

Two foreign private airlines—Romanian-owned **Dan Air** and Greek-owned **Air Mediterranean**—started direct scheduled flights to Damascus in June and July 2025 respectively. Dan Air's exclusive agent in Syria is a company named **Nasma Travel**; Air Mediterranean's is **Almera Travel**.²²⁹ Official records do not identify Al-Dj Group as

224- Norbert Fiess et al., "[Syria Macro-Fiscal Assessment](#)," The World Bank, June 2025.

225- ALDJ Group, "[Profile Page](#)," Facebook, accessed 1 November 2025.

226- ALDJ Group, "[With all pride and dignity...](#)" (in Arabic), Facebook post with video, 0:35, 17 December 2024.

227- "[Electricity Prices in Citizens' Views: Between Reality and Official Statements... Toward a Regulated Mechanism and Fair Tariff](#)" (in Arabic), Al-Thawra, 11 August 2025.

228- Syria's Aviation Authority in July 2025 announced plans to establish a new international airport in Damascus and to upgrade the existing airport to accommodate an expected 30 million passengers per year — "[Syria Plans a New International Airport in Damascus With a 30M Passenger Capacity](#)," Enab Baladi, 24 July 2025.

229- fly_to_syria, "[Profile Page](#)," Instagram, accessed 1 November 2025.



co-owned and managed by **Muhamad Majd Hussein** Deiry, or “Majd Deiry,” a Syrian arms dealer. In April 2024 he was designated by the US under its Belarus sanctions program for alleged arms trafficking from that country to Sudan through an Iraq-based company. The FBI had earlier issued an arrest warrant against him after he was charged with illegally exporting arms from the US to Sudan and Iraq.²³³ Through its connections with Majd Deiry and possibly with Nasma Travel, Al-Dj Group appears to have acquired a stake in Dan Air’s operations.

Yet Al-Dj is also linked to Air Mediterranean. Al-Dj acted as the exclusive agent of that airline, which flew in Damascus between November 2017 and October 2023. He also was its agent in Libya. Mediterranean Airlines is owned and run by the Lebanese-Greek Hallaq family, headed by influential Lebanese businessman **George Hallaq**.²³⁴ The company’s flights in Syria were suspended one month after the Observatory of Political and Economic Networks exposed Al-Dj’s involvement in the captagon trade and in smuggling weapons and mercenaries.²³⁵ When Mediterranean Airlines resumed its operations in Syria in July 2025, Almera Travel opened its main office in downtown Damascus, a five-minute walk from Nasma Travel/Free Bird Travel, Dan Air’s exclusive agent. Remarkably, Majd Deiry appeared at the ceremony celebrating Air Mediterranean’s first flight in Damascus. Dressed in a beige jacket and trousers, Deiry posed with pilots, airline executives, Syrian Civil Aviation Authority officials, and the Greek consular chargé d’affaires in front of an Airbus (see picture, second from the right).²³⁶

230- Nasma Travel, “[Profile Page](#),” Instagram, accessed 1 November 2025; Freebird, “[Profile Page](#),” Facebook, accessed 1 November 2025 — When we visited the office on Maysaloun Street, Engineers Building, 12th floor, it was marked as that of Nasma Travel. Our questions as to whether it still belonged to Freebird Travel or whether the latter had moved out went unanswered.

231- US Department of the Treasury, “[Treasury Sanctions Financial Facilitators and Illicit Drug Traffickers Supporting the Syrian Regime](#),” Press Release, 26 March 2024.

232- Syrian Ministry of Tourism, “[Tourism Offices – Damascus](#)” (in Arabic), accessed 1 November 2025; “[Burhan Rasheed Abu Shaar](#)” (in Arabic), manhom.com profile, accessed 1 November 2025.

233- US Federal Bureau of Investigation, “[Wanted by the FBI: Mohamad Majd Deiry](#),” accessed 1 November 2025; US Department of Justice – Office of Public Affairs, “[International Arms Dealers Charged with Conspiring to Unlawfully Export Weapons and Ammunition from the United States to Sudan and Iraq](#),” Press Release (Archived Content), 16 April 2024. — For more background see: George Schinas, “[The Lebanese Fugitive Who Disappeared From Athens](#),” iMedD (Incubator for Media Education and Development), 6 March 2025.

234- Shaar et al., “[How a Drug Kingpin Is Running Flights from Damascus to the Rest of the World](#).”

235- Shaar et al., “[How a Drug Kingpin Is Running Flights from Damascus to the Rest of the World](#).”

236- Maraya Al-Sham, “[The first Air Mediterranean flight landed...](#)” (in Arabic), Facebook post, 30 June 2025.

Deiry presents himself as director of yet another company named **Arkhos**. That company's LinkedIn page says it is based in Lebanon under the name Arkhos Offshore S.A.L.—but in an interview held at a reception by Air Mediterranean, Deiry himself described it as a small Greek company.²³⁷ It is unclear exactly how Arkhos is involved in Air Mediterranean's operations, merely stating that it is “proud that [Air Mediterranean's] first plane landed in Damascus.”²³⁸ A spokesperson at the Syrian Civil Aviation Authority did not respond to our query regarding this matter. It may be that Arkhos is behind Almera Travel, but there is no evidence for this. The company also may be involved in Air Mediterranean's cargo handlings. All the same, it remains striking that Majd Deiry, Al-Dj's partner from the captagon heyday, seems involved in the very airline for which the latter used to be an exclusive agent.

Al-Dj's involvement in the operations of Dan Air and Air Mediterranean in Syria is troubling at multiple levels. It points to the fact that many companies are simply continuing business as usual despite being sanctioned for their complicity in Assad's crimes. It suggests a connection between an otherwise legitimate business—which the new Syria desperately needs—and an arms trafficker indicted in the US and wanted by the FBI, together with a businessman connected to Assad's captagon trade. Al-Dj's involvement in both private airlines also raises serious questions about respecting market competition principles relevant to keeping travel to Syria affordable for millions of refugees and emigrants who want to visit or return to their country.²³⁹ Finally, and perhaps most pertinently, it raises the question why the transitional government allows all this to happen.

Overriding corporate justice, information blackout, and looming cronyism

While the new Syrian government prioritized “civil peace” over transitional justice regarding Assad's henchmen, its dealings with the former regime's businessmen have been overshadowed by an economic rationale. This viewpoint is already evident in how businessmen linked to the regime were approached; not by the TJC but by an “Economic Committee.”²⁴⁰ This perspective has also appeared in the work of some Syrian human rights organizations, which generally do not include corporate accountability in their understanding of transitional justice.²⁴¹ Given many businessmen's complicity in Assad's repression and regime violence, however, the logic informing such a compartmentalization is far from ironclad.

237- Arkhos Offshore S.A.L., “[Overview](#),” LinkedIn, accessed 1 November 2025; Ammar Dabaan, “[We are proud that the first plane...](#)” LinkedIn post, accessed 1 November 2025; syr.plus, “[The first Greek company announces its entry into the aviation sector in Syria](#)” (in Arabic), Instagram post with video, accessed 1 November 2025.

238- Ammar Dabaan, “[We are proud that the first plane...](#)” — In a warning sent by a lawyer for the company to investigative journalists of VoxEurope, Air Mediterranean denied it has any links to Majd Deiry — Muhamad Bassiki, Lorenzo Di Stasi, Janine Louloudi, Nikos Morfonios, and Sofia Turati, “[From Athens to Damascus: How a Greek Airline Became a Hub for Sanctioned Elites and Shadow Networks](#),” Voxeurop, 11 August 2025.

239- For now, Dan Air and Air Mediterranean have a quasi-monopoly on direct flights to Damascus from Europe. Competitors Cham Wings and Syrian Air do not yet operate flights to European destinations. Other foreign airlines offer only indirect routes.

240- One government advisor did not rule out that the TJC may eventually examine cases involving businessmen, indicating that it could approach such matters from an anti-corruption perspective — Interview with a government advisor, Damascus, May 2025.

241- The Syrian Program for Legal Development is an important exception — See “[Damascus Conference Warns Against Rebuilding the Economy at the Expense of Human Rights](#),” Enab Baladi, 3 November 2025.

Government advisors have repeatedly argued that, given the dismal state of Syria's economy, enticing Assad's businessmen to return to Syria is imperative.²⁴² To assess this argument, one needs to unpack it: What exactly is the objective when Assad's businessmen are encouraged to return or resume their business?

If it is their technical skills and professionalism, one could reasonably wonder whether businessmen like Muhamad Hamsho or a shopping mall tycoon like Bilal al-Na'al, who seized opportunities presented by a war economy, possess qualifications that are indispensable to the new Syria. Many of Assad's businessmen mainly ran import companies or real estate investment firms, for which exceptional skills are hardly required. Even if they did develop any skill sets relevant to doing business, these were shaped by monopolistic practices and deeply ingrained cronyism at the expense of ordinary Syrians. These are exactly the qualities that the new Syria should steer away from in its efforts to rebuild.

Segments of Syria's old business class that were not fully blended into the Assad regime, including the Damascene and Aleppine commercial bourgeoisie, could present an alternative. Some of them already resent being sidelined by what they see as the transitional government's efforts to entice Assad's businessmen to resume their operations in Syria.²⁴³ Their ranks could be strengthened by tens of thousands of Syrian entrepreneurs who fled the country after 2011 due to war and repression, many of whom built successful businesses abroad and gained expertise in global markets.²⁴⁴ There may be some exceptions where highly specialized technical skills are needed—for example in the oil sector—but overall, the argument that Syria cannot do without Assad's businessmen because of their exceptional skills does not add up.

Their capital and assets are another matter. As discussed in Part 2 of this report, some of Assad's businessmen hold significant assets abroad, mainly in the UAE, Lebanon, and perhaps in global offshore centers. It seems that the transitional government is mainly eyeing their assets and is therefore keen to engage with these individuals, hoping they will give the country's economy a crucial capital injection.

Yet thus far most businessmen with large assets abroad have failed to bite. With some important exceptions, it has been primarily entrepreneurs whose principal and immovable assets are already in Syria who have struck deals with the government or entered negotiations. The Qatarjis and Rami Makhoul refused the transitional

242- Interviews with transitional government advisors, Damascus, May–July 2025.

243- "They are giving the old crooks of the Assad regime all the opportunities. They meet with them, they strike deals, they hold trade fairs. My family has been in business in Syria for decades; we suffered under the Assad regime; I was pushed out of my investments by the regime's thugs who turned into businessmen overnight. And yet no one approaches us. What kind of a revolution is this when the old guys are simply coming back?" — Online interview with a businessman, Damascus, August 2025.

244- Sinan Hatahet, "[Entrepreneurship in Syria: A Path to Economic Recovery](#)," Syria in Figures, Issue 5, Karam Shaar Advisory Ltd., February 2025. — Speaking in 2017, Samer al-Dibis, then chairman of the Damascus Chamber of Industry and under sanctions, estimated the number of Syrian entrepreneurs who had left the country at 150,000. — "[Syrian Businesspeople Map](#)," Syrian Economic Forum, January 27, 2016. Internet Archive, archived June 11, 2016. Accessed November 1, 2025.

government's terms for a settlement, presumably because they can fall back on their foreign assets. There is nothing to suggest that those businessmen who did come back, who also hold assets abroad, have transferred their assets back to Syria. Most of them seem to be hedging their bets, literally so by commuting between Syria and Dubai.

At best, therefore, the economic rationale for surrendering justice objectives in favor of dealmaking only holds partially. Dealmaking makes sense economically in rare cases where businessmen possess highly specialized skills and expertise, or indirectly perhaps where such deals convey a signal to other businessmen with sizable assets abroad that the transitional government genuinely wants to do business.

This brings us back to the fundamental dilemma the Economic Committee was said to be facing when it started its operations out of the Four Seasons hotel. The two alternatives to striking deals with Assad's cronies—full-scale nationalization or taking them to court case-by-case—were deemed to be unfeasible. Yet with the limited validity of an economic argument for dealmaking, the transitional government is left with a poor justification for overturning corporate justice.

At the very least, greater efforts should be made to rebuild Syria's judicial capacities and, pending these, initiate court cases against prominent businessmen whose entrepreneurship entailed the support and use of violence, extortion, and human rights abuse. The transitional government appears to realize the pitfalls of its dealmaking with Assad cronies, if only because it proved highly controversial. Yet thus far this has only prompted assurances that the deals made are not settlements offering businessmen immunity from future prosecution for war crimes. Similarly, the government claims that none of the deals have been finalized: "[The] pursuit of justice in those cases continues. Rushing these processes risks undermining the justice people are rightly demanding."²⁴⁵

It is true that the negotiations with Assad's businessmen have been looked at too narrowly from a perspective of done deals and permanent settlements. The government more likely treats its negotiations with businessmen indeed as an ongoing "process" of give-and-take in which it hopes to progressively get maximum gains as circumstances change in its favor. However, and not dissimilar to the dealmaking with Assad's henchmen, there is no reason to assume that the transitional government or its successors will see their leverage increase, and even less so that they will use such leverage for the good of justice.

Other factors also seem to have pushed the transitional government toward striking deals with businessmen or de facto allowing them to resume business. The UAE government is believed to play a role in the transitional government's engagements with Syrian businessmen associated with the Assad regime.²⁴⁶ Although details of such maneuvering behind-the-scenes are lacking, the UAE's hosting of many businessmen

245- Shaheen, "[Balancing Fairness and Stability in Syria's Political Transition](#)."

246- Interviews with Syrian journalists and businessmen, Damascus, May–June 2025.

close to Assad likely factored into its efforts, following the regime's collapse, to secure inroads into the Syrian economy.

In keeping with its approach during the final Assad years to fuse its business and foreign policy interests to project regional power, the UAE is clearly seeking a pivotal role in the new Syria both through diplomacy and commercial policies.²⁴⁷ Numerous high-level meetings, including between the UAE's President Sheikh Muhamad bin Zayed al-Nahyan and President Ahmad al-Sharaa, suggest a deepening relationship. One such meeting in April 2025 resulted in the release of Syrian businessman Muhanad al-Masri, who was arrested in the UAE in 2019 on charges of financially supporting terrorism. Al-Masri flew back to Syria on a plane with President Sharaa.²⁴⁸ In August 2025 the UAE signed Memoranda of Understanding (MOUs) for infrastructure projects in Syria worth USD 14 billion.²⁴⁹ A month earlier, an agreement was signed giving the UAE's DP World a concession to manage and operate the Port of Tartous worth USD 800 million.

This context increases the stakes of the negotiations with Assad's businessmen based in the UAE. The UAE, for its part, may welcome deals with these businessmen because such arrangements allow it to enter strategic and lucrative business ventures in Syria, as demonstrated in the case of Cham Wings/Fly Cham. Most Syrian businessmen in the UAE are partnering with Emirati investors, as is still required in certain sectors for foreign investors and as also often occurs informally.²⁵⁰ Accordingly, getting Syrian businessmen back to Syria would open doors for their Emirati partners. If this analysis is correct, one may expect that some of the twenty sanctioned Syrian businessmen we identified as based in the UAE may be willing to eventually return to Syria.

While overriding or setting aside concerns of corporate justice is inherently problematic, the ways in which the transitional government, and the Economic Committee especially, arrived at their decisions are equally troubling. As noted earlier, the committee does not formally exist, thereby eliminating its own accountability. It has not even been acknowledged who its members are.

We encountered great difficulties in compiling a comprehensive list of companies the committee restructured or reorganized: which were seized or not, what happened to them, and which businessmen entered negotiations and with what outcomes, if any. This profound lack of transparency hinders any attempt to determine what the Economic Committee and other government officials have been doing in their engagements with Assad's businessmen. Just as worryingly, the information blackout has excluded the Syrian public and civil society organizations from the decision-making.

247- Leonardo Mazzucco, "[Deep Dive: How the UAE Girds to Enter the New Syria](#)," Amwaj Media, 14 July 2025.

248- Levant24, "[The UAE released Syrian businessman Muhanad al-Masri arrested 6 years ago on charges allegedly for supporting terrorism](#)," X post (formerly Twitter), 15 April 2025.

249- BNE Gulf Bureau, "[Syria Signs \\$14bn Investment Deals with International Companies](#)," BNE IntelliNews, 6 August 2025.

250- "[Federal Decree Law No. \(32\) of 2021 on Commercial Companies](#)," UAE Official Gazette, no. 712 (2021).

Furthermore, the lack of transparency causes uncertainty about which former regime-associated businessmen have been or will be rehabilitated and which ones will not. This, in turn, has made potential sources of information—such as former accountants and other former employees of Assad’s businessmen—reluctant to come forward, as they fear repercussions from their former employers, who may still be in a position to enforce confidentiality clauses they once signed or take other legal or non-legal action.²⁵¹ We suspect that the Economic Committee has faced similar obstacles when consulting informants, given its own lack of transparency, even if it had other means of mapping Assad’s business networks.

Some have criticized the opaque and top-down way corporate justice has been approached as an example of what they see as authoritarian tendencies rooted in the belief that the overthrow of the Assad regime was thanks to HTS alone. This mindset, attributed to HTS members and leaders, has been succinctly put as follows: *Man yuharir, yuqarir* (“The one who liberates, decides”).²⁵² Related to this, a lack of transparency and accountability has fed suspicions of cronyism and nepotism creeping into the transitional government’s general way of working, and specifically involving the Economic Committee.

In only a few months, the inner circle around President Sharaa has proven to be extremely narrow but difficult to decipher. General impressions are that Sharaa, together with his brothers Maher and Hazem, is making core decisions.²⁵³ Major government contracts appear to have been allocated and MOUs signed without tendering and/or involving (unsanctioned) companies linked to the Assad regime and companies considered close to HTS officials.²⁵⁴ In addition, there has been a proliferation of “administrative sheikhs,” informal power brokers embedded in parallel structures of decision-making in the shadow of formal state institutions.²⁵⁵ The Economic Committee has been one of them.

251- Assad-linked businessmen appear emboldened in their dealings with the transitional government, as shown in the case of Muhammad Hamsho. In March 2025, activist Abdul-Hamid Assaf was briefly detained after Hmisho filed a complaint against him. Assaf had posted an audio recording alleging Hmisho’s involvement in looting materials from homes in the Qaboun neighborhood with officers of the Fourth Division. He reported being compelled at the police station to sign a pledge not to harass Hmisho. The complaint was later dropped. — [“Through a Recorded Testimony, an Activist Reveals an Arbitrary Arrest Due to Muhammad Hamsho”](#) (in Arabic), Zaman Al-Wasl, 22 March 2025.

252- Ali.Doughni, [“There is no official statement from the Syrian government saying...”](#) (in Arabic), X post (formerly Twitter), 14 October 2025.

253- Hazem al-Sharaa is believed to be overseeing relations with the business community. His brother Maher has been appointed secretary-general for presidential affairs and is coordinating line ministries and their relations with the presidency. — [“A Tight Inner Circle and Parallel Structures: Sharaa Moves to Cement Control,”](#) The Syria Report (subscriber-only content), 26 August 2025.

254- These include, among others, the DP World contract, an MOU with a Chinese company to build or manage free-trade zones, and an MOU with a Qatari company for the construction of power plants. — Joseph Daher, [“HTS Strategy to Consolidate Its Authority”](#) (in Arabic), Syria Untold, 4 July 2025. — Many of the signed MOUs, however, did not result in formal agreements or contracts. — [“Syria Tightens MoU Rules as Investors Fail to Show Up,”](#) The Syria Report (subscriber-only content), 23 September 2025. — Another government contract for processing digital payments of public-sector salaries and collecting utility bills was awarded to a newly created company, Sham Cash. The company is a collaboration between two money-transfer firms linked to the Assad regime, Al-Haram and Al-Fouad (neither sanctioned), and an entity close to HTS, Sham Bank. — Haid Haid, [“Sham Cash: The Problem With Syria’s New Digital Salary App,”](#) Al Majalla, 12 May 2025.

255- Daher, [“HTS Strategy to Consolidate Its Authority”](#) (in Arabic); [“Syria’s Phantom Institutions,”](#) Syria in Transition, May 2025.

When combined with the obscure conditions under which some of the restructuring of companies has occurred (or failed to occur) and the equally opaque features of new business initiatives, impressions of looming cronyism are easily reinforced. The case of Dan Air and Air Mediterranean stands as an example. Notably, in the years that it controlled its statelet in Idlib governorate before the collapse of the Assad regime, HTS was also criticized for unfair practices marked by nepotism and cronyism in construction, telecommunications, money exchange companies, and the trade in fuel and food products.²⁵⁶ In fact, some of the individuals who later became members of the Economic Committee featured in such alleged malpractices of the past.

The transitional government announced the establishment of three new and officially mandated institutions which are believed to replace or to have already replaced the shadowy Economic Committee: The Committee to Combat Illicit Gains (in April 2025),²⁵⁷ a Sovereign Wealth Fund (in June 2025)²⁵⁸ and a reformed Investment Authority (also in June 2025).²⁵⁹ While encouraging as such, the blueprints for these agencies are still very generally phrased in terms of their tasks, responsibilities, and checks. Furthermore, they all seem to fall under the sole and direct authority of the president, allowing for little or no independent or parliamentary oversight.

More specifically concerning the assets seized from Assad's businessmen, the Sovereign Wealth Fund seems to be designed to place and manage such assets. However, to date no details have been provided as to what assets the Fund actually holds or will hold. Whether such details will be publicly released is doubtful, given that the Fund's financial reports are to be sent only to President Sharaa.

256- Mansour Hussein, [“From Freelance Jihad to Crony Capitalism: Al-Julani’s Monopolists in Northwestern Syria,”](#) translated by Anas Al Horani, Al-Jumhuriya, 24 May 2024; [“Hayat Tahrir Al-Sham Restructures Lucrative Business Sectors,”](#) The Syria Report (subscriber-only content), 15 November 2022; Operations & Policy Center, Nisreen Al-Zaraee, and Karam Shaar, [“The Economics of Hayat Tahrir al-Sham,”](#) Middle East Institute, 21 June 2021; [“The Golden Benefits Discovered From Cutting the Internet Network”](#) (in Arabic), FromIdlib.com, 5 November 2024; Jerome Drevon and Patrick Haenni, [“How Global Jihad Relocalises and Where It Leads: The Case of HTS, the Former AQ Franchise in Syria,”](#) European University Institute, RSC Working Papers, January 2021; Orwa Ajjoub, [“Crossroads in Idlib: HTS Navigating Internal Divisions Amid Popular Discontent,”](#) Middle East Institute, 13 May 2024; Samer Al-Mahmoud, [“HTS: Espionage and Corruption Devour Al-Julani’s Inner Circle”](#) (in Arabic), Daraj Media, 4 August 2023; [“‘Namaa for Investment’: A New ‘Sham Holding’ Company in Idlib”](#) (in Arabic), Eqtsad News, 28 February 2021.

257- “Presidential Decree No. (13) of 2025 on the Formation of the Committee to Combat Illicit Gains” (in Arabic), Presidency of the Syrian Arab Republic, 4 April 2025, photo in Tartous Qeṭ’a Min al-Rūḥ, [“The Syrian Presidency Forms an Anti-Illicit-Gain Committee to Combat Corruption and Strengthen Transparency in State Institutions”](#) (in Arabic), Facebook post, 16 June 2025.

258- [“Presidential Decree No. \(113\) of 2025: Establishing the Political Fund”](#) (in Arabic), Presidency of the Syrian Arab Republic, 24 June 2025, text reproduced at SyrianMemory.org.

259- [“Presidential Decree No. \(114\) of 2025: Amending Certain Articles of the Investment Law”](#) (in Arabic), Presidency of the Syrian Arab Republic, 24 June 2025, text reproduced at SyrianMemory.org.

More generally, transitional government officials, including President Sharaa and Economy Minister Nidal al-Shaar, have repeatedly pledged to rebuild state institutions based on transparency and accountability, and promised to put in place strong anti-corruption controls and measures against bribery and conflicts of interest.²⁶⁰ The degree to which these intentions and decrees are followed by concrete steps—and result in a significant change in the government’s relations with the business sector—will not only affect good governance generally but also its pursuit of transitional justice.

260- [“Syria’s Transitional President Announces Formation of New Government,”](#) North Press Agency, 30 March 2025; [“Syria Government Announces Dates for ‘International Exhibition for Reconstruction of Syria,’”](#) The Syrian Observer, 23 July 2025; Al-Sharq Al-Akhbar – Syria, [“President Al-Shar’: We Will Not Repeat the Mistakes of the Past, and Investors Should Not Be Forced to Partner With the Authority”](#) (in Arabic), Facebook post with video, 2:10, 12 October 2025.

4. Targeted sanctions for accountability

Following the collapse of the Assad regime, the EU, UK, and US reviewed their designations of Syrian individuals and entities. They have made it clear that targeted sanctions are there to stay, to serve accountability for the Assad regime's crimes. Accordingly, the US renamed its Syria sanctions program the "Promoting Accountability for Assad and Regional Stabilization Sanctions (PAARSS) program."²⁶¹ The UK described its amendments to its Syria sanctions program as "allow[ing] the UK to hold Assad and his associates accountable for human rights violations."²⁶² The EU stated that it "will maintain sanctions related to the Assad regime in line with its call for accountability."²⁶³

This repurposing of targeted sanctions translated into revisions of designee lists, primarily by delisting most Syrian state institutions, agencies, and state-owned companies, to allow Syria to get back on its feet just as most sectoral sanctions were lifted. These delistings reflected the assessment that such designations were no longer needed, as state organizations are now under new management and no longer serve the Assad regime in its repression and mass violence. In addition, the EU, UK, and US have delisted several individuals and private companies. Yet most designations of Assad regime officials and their accomplices remain in place.

Targeted sanctions can be important tools for accountability and transitional justice. However, sanctioning states need to more thoroughly review their lists of sanctioned individuals and entities and be transparent and accountable themselves in their designations. They also need to strictly adhere to these designations in their policies. For targeted sanctions to be effective, they need to be complemented with proactive steps to improve compliance, including vis-à-vis states currently offering sanctuary to designated individuals and their assets.

Finally, sanctioning states need to urgently step up their assistance in areas that, since the fall of the Assad regime, have proven to be obstacles to the transitional government's pursuit of justice and accountability: the country's dilapidated judiciary and its modest economic recovery, which fails to meet colossal socio-economic needs. All these steps toward rendering targeted sanctions effective tools for transitional

261- Office of Foreign Assets Control, "[Promoting Accountability for Assad and Regional Stabilization Sanctions \(PAARSS\): Changes to OFAC's Syria Sanctions Program as of June 30, 2025](#)," US Department of the Treasury, accessed 1 November 2025. — In his Executive Order of 30 June 2025, US President Donald Trump stated that additional steps were needed "to ensure meaningful accountability for perpetrators of war crimes, human rights abuses, and narcotics-trafficking networks associated with the former Assad regime," which he described as "an unusual and extraordinary threat to the national security and foreign policy of the United States." — "[Executive Order 14312 of June 30, 2025: Providing for the Revocation of Syria Sanctions](#)," Federal Register, vol. 90, no. 126 (3 July 2025): 29395.

262- Foreign, Commonwealth & Development Office and Hamish Falconer MP, "[UK Bolsters Support for Syrian People by Amending Syria Sanctions](#)," press release, Gov.uk, 24 April 2025.

263-Syria: Council Statement on the Lifting of EU Economic Sanctions," Council of the European Union, press release, 20 May 2025.

justice call for intense engagement and coordination with both Syria's transitional government and civil society actors involved in seeking accountability for the Assad regime's crimes.

That there is a synergy between targeted sanctions and transitional justice is commonly understood, but it is rarely specified how exactly they relate to one another or how sanctions can contribute to accountability for human rights abuse. As observed by Elena Naughton of the International Center for Transitional Justice (ICTJ), “[Traditionally], sanctions and transitional justice have operated in separate spheres, serving different purposes in the broadest sense.”²⁶⁴ In their targeted sanctions review on Syria, the EU, UK, and US did not articulate what they expect from their new emphasis on accountability in continuing to sanction Assad regime officials and their accomplices, or how they envision their synergy.

Theoretically, however, sanctions “function as a form of retributive justice by directly punishing the targets, including the responsible individuals and their families, through travel bans, asset freezes, and an immediate form of reputational impact.”²⁶⁵ One added value sanctions offer in this context is that they allow for pursuing individuals extraterritorially—at least in theory. Sanctions may also contribute to truth-seeking when the gathering and sharing of information by justice actors about possible sanctions targets and monitoring are closely coordinated. Furthermore, sanctions can be compatible with a victim-centered approach to transitional justice “by offering a measure of repair to victims, including by recognizing victims, reinforcing due process, and signalling that no one is above the law.”²⁶⁶ Ultimately, sanctions may play a role in asset recovery and restitution through the tracing, freezing, confiscating, and repurposing of assets. With these general goalposts in mind, it is important to critically assess the specifics of the continued designation of Syrian individuals and entities implicated in the Assad regime's crimes and the delisting of others.

Relistings and delistings

The EU, UK, and US amended their Syria-related designations in keeping with their shared objective to hold the Assad regime and its accomplices to account. The first to do so was the UK, when on 6 March 2025 it removed 24 entities from its Syria sanctions list.²⁶⁷ On 24 April it delisted 12 more entities.²⁶⁸ One day later it released a consolidated list of 310 individuals and 39 entities related to Syria that remained under UK sanctions.²⁶⁹ The EU followed on 27 May as it issued a list of Syria-related

264- Isabella Wylie, [“Sanctions and Transitional Justice: An Interview with ICTJ’s Elena Naughton,”](#) International Center for Transitional Justice, 22 April 2025.

265- Elena Naughton, [“Of Two Minds: Sanctions as a Form of Accountability and the Dilemmas for Transitional Justice,”](#) International Center for Transitional Justice, February 2025, p. 12.

266- Naughton, “Of Two Minds,” p. 20.

267- Office of Financial Sanctions Implementation, [“Financial Sanctions Notice: Syria,”](#) HM Treasury, 6 March 2025.

268- Office of Financial Sanctions Implementation, [“Financial Sanctions Notice: Syria,”](#) HM Treasury, 24 April 2025.

269- Office of Financial Sanctions Implementation, [“Financial Sanctions Notice: Syria,”](#) HM Treasury, 25 April 2025.

sanctioned individuals and entities, announcing that it was removing 22 entries.²⁷⁰ On 28 May it added five new entries and on 23 June another five.²⁷¹ In total, the EU maintains a list of 361 sanctioned individuals and 67 entities related to the situation in Syria. The US announced its Syria targeted sanctions review on 30 June, removing a much larger number of entries from its Specially Designated and Blocked Persons (SDN) list connected to Syria.²⁷² In total, the US government kept sanctions in place against 138 individuals and entities related to Syria.

What the delistings have in common is that they apply to a number of state entities, such as the Syrian Central Bank and a number of oil companies, also mostly state-owned. All three sanctioning actors also removed some banks and two private companies, Syriatel and Pangates International. In addition, the UK and the US deleted several Syrian media companies from their lists; these do not feature on the EU list. The EU delisted one more private company, Al-Aqila Takaful Insurance company, which has not been sanctioned by the US and the UK.

For targeted sanctions to serve accountability for the Assad regime's crimes, the delisted individuals and entities are of particular interest. In many cases, the rationale for lifting sanctions on them appears straightforward and justified. With regime change, there appears to be no valid reason to continue sanctioning most state entities and institutions. The US delistings also indicate that it viewed more junior profiles among sanctioned individuals as grounds for removal, leading to sanctions being lifted on scores of junior staff at the SSRC. In addition, the US removed sanctions on ministers, ministers of state, and public servants who merely held government positions considered broadly supportive of the Assad regime and its repressive policies. They were not directly involved in mass violence or complicit with the regime's coercive agencies.

Examples include **Duraïd Durgham**, a former governor of the Central Bank, **Subhi Ahmad al-Abdullah**, a former minister of Agriculture, **Yahya Mu'alla**, a former minister of Higher Education, and **Jasim Muhamad Zakaria**, who served a few months as minister of Labor and Social Affairs. As we noted in Part 2 of this report, sanctioning these persons signaled to the Assad regime a disapproval of its behavior. They were not sanctioned because they were believed to have been guilty of any crimes. However, the EU and the UK did not delist any individuals who meet this profile.

270- [“Council Implementing Regulation \(EU\) 2025/1094 of 27 May 2025 Implementing Regulation \(EU\) No. 36/2012 Concerning Restrictive Measures in View of the Situation in Syria,”](#) EUR-Lex, 28 May 2025.

271- [“Council Decision \(CFSP\) 2025/1110 of 28 May 2025 Amending Decision \(CFSP\) 2020/1999 Concerning Restrictive Measures Against Serious Human Rights Violations and Abuses,”](#) EUR-Lex, 28 May 2025; [“Global Human Rights Sanctions Regime: EU Imposes Restrictive Measures on Five Syrian Individuals Associated With the Former Assad Regime for Supporting Crimes Against Humanity and for Fueling Sectarian Violence,”](#) Council of the European Union, press release, 23 June 2025.

272- Office of Foreign Assets Control, [“Revocation of Syria Sanctions; Publication of Syria Frequently Asked Questions; Syria and Syria-Related Designation Updates and Removals,”](#) US Department of the Treasury, press release, 30 June 2025; amended 4 August 2025.

Some other sanctions removals do not seem to adhere to a clear or consistent logic and, from an accountability perspective, may be open to objection.²⁷³ Sanctions on Syriatel, the country's largest provider of mobile phone services, may have been lifted out of pragmatic considerations, but the company's ownership—formerly linked to Yassar Ibrahim and a range of fronts—remains murky even after it received a new CEO and new board members. It has also maintained its business ties to EU-designated businessman Ali Najib Ibrahim, who was close to Yassar Ibrahim.

Pangates International was delisted by all three sanctioning states, but we could not find it in the UAE's commercial registry, where the company is said to be based. Its assets appear to remain hidden in offshore accounts, and there have been no reports of it being restructured or undergoing a change of ownership.²⁷⁴ It seems strange that a company found to have been involved in providing jet fuel to Syrian regime forces is to be delisted. Only two years ago, other foreign companies were forced to file for bankruptcy after being associated with Pangates International.²⁷⁵ Our questions to officials of the sanctioning states about why Pangates' designation was removed went unanswered

Al-Aqila Takaful Insurance was delisted by both the EU and the UK. In this report we found that its board of directors was dissolved, but details on a change of ownership or genuine restructuring are lacking. Before delisting, such information would be essential given that the company was closely connected to influential businessmen under the Assad regime.

From a perspective of accountability for past crimes or complicity in such crimes, some of the US delistings similarly raise serious concerns. The US lifted sanctions on Wassim al-Qattan and the Massa Plaza mall he still appears to operate. This is despite al-Qattan's profile as a prominent businessman linked to the Assad regime and to Rami Makhlouf, who benefited from smuggling into regime-besieged areas and financially supported Assad's aid programs to "martyrs" and wounded among regime forces. Mirza Company was also delisted—the company involved in the Marota City project that displaced and defrauded the area's original homeowners. (The company and its owner, Anas Talas, remain under EU and UK sanctions.) Damascus Cham Holding, the entity overseeing the Marota project, also was delisted by the US but not by the EU or the UK. The holding's restructuring has barely begun, compensation issues with the area's original owners remain unresolved, and some regime-linked businessmen continue to be among its key shareholders.

273- For details on individuals and companies mentioned, see Appendices 1 and 2.

274- The US also delisted the company's owners.

275- In April 2023, the Dutch-Belgian company Staroil was declared bankrupt after years of unsuccessful court challenges in the Netherlands against an asset freeze imposed for its business links to Pangates International. The US had lifted its sanctions on Staroil in May 2021. However, bankruptcy procedures were terminated in May 2025. — "[Public Search: Star Oil Company](#)" (in Dutch), Kruispuntbank van Ondernemingen (Belgium), accessed 12 December 2025; "[OFAC Removes Sanctions on Netherlands-based Staroil](#)," The Syria Report (subscriber-only content for details), 18 May 2021; "[Staroil v. ING: Appeal Concerning Frozen Dollar Account Following OFAC Listing](#)" (in Dutch), Gerechtshof Amsterdam, decision of 6 October 2020, ECLI:NL:GHAMS:2020:2621, published on Rechtspraak.nl, 7 January 2021.

The US also lifted sanctions on other companies whose restructuring and changes in ownership remain unclear, including whether they have severed ties with their original owners who were complicit with the Assad regime. These companies include Cham Islamic Bank, the Four Seasons hotel in Damascus, and Qasioun Mall.

The US also delisted some individuals who had died. One of them is Nader Qala'i, a Canadian-Syrian businessman who died in February 2021. He was a close friend of Basil al-Assad, Bashar al-Assad's late brother, and other members of the extended Assad family, and worked with Rami Makhoul. Thanks to these connections Qala'i became CEO of Syriatel when it was still under Makhoul's control, and he reportedly ran several companies in Vienna that managed Makhoul's real estate investments in Dubai.²⁷⁶ Canadian authorities investigated Qala'i for alleged breaches of sanctions, but he was acquitted in 2020.²⁷⁷ While it evidently makes sense to delist deceased individuals, it raises questions about their assets, which were likely inherited by their relatives. Qala'i left behind his wife and six children, all of whom are involved in companies including **Al-Bina' Steel (Steel Build Co.)**, established in 2022.²⁷⁸ There are no indications that OFAC investigated or attempted to seize Qala'i's assets when it delisted him and a number of his companies.

In contrast, in 2019 the UK's National Crime Agency seized GBP 24,668 belonging to Anisah Shawqat—the daughter of deceased security chief and Deputy Defence Minister Asef Shawqat—who was residing in London. The money was found to have been transferred to the UK by her relatives in Syria in breach of sanctions.²⁷⁹

The US rightly removed sanctions on many second-tier state officials, considering that in Assad's Syria ministers and senior bureaucrats were often reduced to this status. Yet it appears to have done so without adequate scrutiny of some individuals' broader complicity with the Assad regime. For example, the US lifted sanctions on Ahmad al-Hamo, who served a short term as Minister of Industry, for which he had been sanctioned. However, he was also a private investor in—and a board member of—Damascus Cham Holding, which could be considered a reason for him to remain designated.

In yet other cases, the US proved to be too hasty in lifting sanctions on second-tier officials shortly before claims emerged about their involvement in the regime's crimes. This applies to Kinda al-Shammatt, one of the two ministers of Social Affairs and Labour who stand accused of involvement in the abduction of children of detainees.²⁸⁰

Finally, the US delisted Farouq al-Shar'a, Syria's former deputy president (2006–2014) and

276- "Assad's Businessmen: [Nader al-Qala'i](#)," ProJustice.org, accessed November 1, 2025. — Several luxury buildings in Dubai were registered in his name. — Bassiki et al., "[Dubai Unlocked: 10 Individuals Within Assad's Close Circle Hide 50 Million Dollars in Dubai Estates](#),"

277- Maya Lester KC and Michael O'Kane, "[Businessman Acquitted of Breaching Syria Sanctions in Canada](#)," Global Sanctions (subscriber-only content), 10 December 2020.

278- "[Company Registration: Al-Bina' Steel \(Issue 42, Part 2, 2022\)](#)" (in Arabic), The Syria Report – Official Documents Database (subscriber-only content), accessed 1 November 2025.

279- "[Al-Assad Family Cash Forfeited in London Court](#)," National Crime Agency (UK), 21 May 2019.

280-Rima al-Qadiri has not been designated by the US. Kinda al-Shammatt and Rima al-Qadiri remain sanctioned by the EU and the UK.

Finally, the US delisted Farouq al-Shar'a, Syria's former deputy president (2006–2014) and foreign minister (1984–2006). Al-Shar'a distanced himself from the Assad regime's repression from the start of the uprising in 2011. He tried to persuade President Bashar al-Assad to take a more conciliatory approach toward the opposition, a view that led to his de facto house arrest in the summer of 2012. He wrote about his experiences in an autobiography published shortly after the collapse of the Assad regime, and he met with interim President Ahmad al-Sharaa at the end of December 2024.²⁸¹ Whether this absolves him of past complicity as a long-serving senior official under the Assad regime is not a judgment for OFAC officials to make. If anything, his delisting underscores the importance of Syrian involvement in the decisions sanctioning states make when seeking accountability in the new Syria.

Improving targeted sanctions' own accountability

For targeted sanctions meant to serve accountability, they remain remarkably opaque and fall short in terms of accountability mechanisms. During the Assad years this posed obstacles for those who felt unfairly sanctioned and attempted to challenge their designation. The EU, UK, and US all have procedures through which requests for delisting can be submitted.²⁸² Yet in the case of the EU, a prominent international lawyer acting on behalf of several designated persons said such requests, submitted during the EU's annual review of its sanctions list, never resulted in delisting.²⁸³ There are no known cases of EU delistings without court proceedings, and the international lawyer we spoke with found that the EU, unlike the UK, rarely specified reasons for its rejections of delisting requests, sometimes failing to respond at all. This left challengers with only one option: to submit a complaint at the European Court of Justice, costing at least EUR 10,000 in legal fees and even more when their case was rejected.

Even after obtaining a positive verdict, she said that the EU often placed these persons back on its sanctions list after making minor changes to their original designations. So-called "status-based" designations—where individuals were sanctioned because of their position in the Syrian government or for being part of the extended Assad family—were especially difficult to challenge effectively, as the EU did not need to demonstrate that the designated individual's conduct was in any way supportive of regime repression or violence. Now that the EU has simply rolled over most of its designations to enforce accountability for the Assad years post-facto, the hurdles to challenging them remain in place.

281- Farouq al-Shar'a, "Memoirs of Farouq al-Shar'a: Volume Two, 2000–2015" (in Arabic), Arab Center for Research and Policy Studies, 2025.; ["Former Assad Deputy: Al-Jolani Meets Farouq al-Shar'a and Calls for a National Dialogue"](#) (in Arabic), Al-Hurra, 22 December 2024. Internet Archive, archived 22 December 2024, accessed 1 November 2025.

282- See (for the EU) ["Sanctions Guidelines – Update,"](#) Council of the European Union, 4 May 2018, p. 51; (for the UK) ["How to Request Variation or Revocation of a Sanctions Designation or Review of a UN Listing,"](#) Foreign, Commonwealth & Development Office, updated 2 February 2023; (for the US) ["Filing a Petition for Removal from an OFAC List,"](#) Office of Foreign Assets Control, US Treasury, accessed 1 November 2025.

283- Interview with a prominent international lawyer, online, May 2025.

The financial costs of initiating a legal challenge are especially discouraging for designated persons who are not particularly wealthy, especially ministers and state officials.²⁸⁴ There are no known cases in which individuals in this category have filed a lawsuit at the European Court of Justice. Many of them continue to face the restrictions imposed on them, including travel bans. For its part, the Syrian transitional government has imposed such travel bans erratically, disallowing travel for some designated individuals while authorizing it for others.²⁸⁵

A lack of transparency and accountability has likewise characterized decisions in which individuals were taken off sanctions lists. In 2021, for instance, **Maher Burhan Eddine al-Imam**, a Syrian regime-linked businessman, lost his legal challenge against his EU designation.²⁸⁶ Nevertheless, the EU delisted him in May 2024 without publicly explaining its decision. In the UK, also in 2021, Tarif al-Akhras—a regime-linked businessman and maternal uncle of Asma al-Assad—was delisted without the government providing any justification. The move caused controversy among Syrian expatriates and human rights activists, who felt that al-Akhras’ proximity to the Assad regime made the delisting unwarranted and suspected that it resulted from an arrangement between him and the UK government.²⁸⁷ Earlier, in 2016, al-Akhras had unsuccessfully challenged his EU designation.²⁸⁸ Similarly, the US announced “deletions to OFAC’s SDN [Special Designated Nationals and Blocked Persons] list” but never publicly explained them.

This lack of accountability in listing and delisting Syrian persons and entities persists even now that the EU, UK, and US have reviewed their designations. The EU simply rolled over the stated motivations for originally sanctioning individuals and entities, many of which often lack specific claims and include status-based cases that are difficult or even impossible to challenge.

As for second-tier ministers and state officials who were designated solely because of their position in government, challengers seem to stand little chance of getting them removed. An EU official involved in the EU’s Syria sanctions program argued that effective challengers had to “prove that they significantly changed their behaviour.”²⁸⁹ But in these cases it was not their behavior but their position that put them on the

284- Interview with Muhamad Shaar (former interior minister), Damascus, 7 August 2025.

285- Former Finance Minister Muhamad al-Jleilati and former Minister of Labour Jasim Muhamad Zakaria, both designated, have been prevented from leaving Syria, apparently because they are on a travel-ban list (see Appendix 1). Conversely, most sanctioned businessmen continue to travel freely to and from Syria.

286- [“Judgment of the General Court \(Fourth Chamber\), 22 September 2021, Case T-203/20, Maher Al-Imam v. Council of the European Union,”](#) EUR-Lex, accessed 1 November 2025.

287- [“UK Decision to Lift Sanctions on Assad-Linked Businessman Sparks Outcry,”](#) Middle East Eye, 20 August 2021; [“Syrian Civil Society and Human Rights NGOs Call on the UK Government to Reconsider and Reverse Its Decision on Lifting Tarif Akhras’ Name from the UK Syria Sanctions Regulations,”](#) Joint Statement, Syrian Center for Media and Freedom of Expression, 20 August 2021; [“Statement to the British Government Regarding Lifting Tarif Akhras’ Name from the UK Syria Sanctions,”](#) Syrian British Consortium, 23 August 2021; Interview with a UK-based Syrian businessman, online, May 2025.

288- [“Judgment of the Court \(Third Chamber\), 7 April 2016, Case C-193/15 P, Tarif Akhras v. Council of the European Union”](#) (in English), InfoCuria, accessed 1 November 2025.

289- Interview with an EU official, online, February 2025.

EU sanctions list in the first place. Even so, further proof is hardly conceivable, as there is little they could demonstrate beyond the fact that they are no longer in those positions, just as the regime they served is no longer in place. Regardless, the EU official said that there was little appetite for reviewing and removing such designations “because this would give the wrong signal” by suggesting impunity for past crimes.

Regarding designations motivated by designated persons’ conduct and ties to the Assad regime, the EU is already receiving many requests to be delisted and the European Court of Justice will likely see a growing number of challenges.²⁹⁰ These cases are likely to face more scrutiny than before. Earlier, the European Court upheld several designations, arguing that the burden of proof placed on designated persons could not reasonably be expected to provide conclusive evidence of their links to the Assad regime and its repression. The Court referred, in this context, to the lack of access to Syria to collect relevant information due to the war. Now that the EU delegation to Syria—even while still based in Beirut—conducts regular field visits to Syria, this argument appears no longer valid.

In its own review of targeted sanctions involving Syria, the UK government also rolled over most of its designations, but only after deleting the specific motivations that originally informed them. All designated persons and entities are now accompanied by a generic and vague statement of reasons.²⁹¹ A lawyer acting on behalf of a Syrian client who intends to request the annulment of his designation said he and his colleagues were left to wonder what they can possibly challenge, as the stated reasons for the continued designations lack any specific claims that can be refuted.²⁹² The US review of its targeted sanctions involving Syria presumably kept in place the original stated motivations for the designations it retained, but it did not repeat them when it presented its review on 30 June. The EU, UK, and US did not publicly explain their decisions where their recent reviews delisted specific individuals and entities.

A new paradigm: with Syria, not against it

When the Syrian transitional government’s negotiations and dealmaking involving Assad regime officials and their accomplices are viewed alongside the sanctions imposed by the EU, UK, and US, it becomes clear that the two sides’ approaches to accountability in the new Syria are clashing. This should be a serious cause for concern and underscore the urgent need for sanctioning states to engage with the Syrian government on matters related to their designations and transitional justice issues more generally.

290-Interview with a European official, online, December 2025. Pending challenges and appeals at the Court of Justice of the European Union include the cases of Samer Kamal al-Assad, Ghada Mhana, and Issam Anboubia. — “[Home Page](#),” Court of Justice of the European Union, accessed 1 November 2025.

291- “There are reasonable grounds to suspect that they are an involved person under the Syria (Sanctions) (EU Exit) Regulations 2019 because they are or have been involved in activities carried out on behalf of the Assad regime ... and/or in supporting or benefitting from the Assad regime.” — OFSI, “[Financial Sanctions Notice: Syria](#),” 25 April 2025.

292- Interview with a UK lawyer representing a Syrian designated person, online, 17 October 2025.

However, sanctioning states do not seem to have initiated talks yet about these matters with the transitional government.²⁹³ This is perhaps because other issues were found to be more pressing—or because sanctioning states have become accustomed to pursuing their designations *against* the Syrian government, as was the case during the Assad years.

There are many ways in which sanctioning states can make a positive contribution to Syria's agenda for transitional justice. First, through targeted sanctions, they can offer the Syrian transitional government extraterritorial leverage in pursuing its efforts to hold the Assad regime and its accomplices to account. The targeted sanctions can also help put corporate justice firmly back on the government's general transitional justice agenda, as the designations include many businessmen and companies. They can also, through a dialogue with the government, put their weight behind those in Syria who rightly sense that, since the regime's collapse, other policy priorities have overtaken the widely shared call for accountability, especially concerning individuals and entities designated for their complicity in past crimes.

However, thus far there seems to have been little mention of these issues in the transitional government's engagements with Western counterparts. Western authorities also do not yet appear to have adapted their sanctions programs for transitional justice in the new Syria, beyond their currently limited review of existing designations.

Areas where sanctioning states can engage with the transitional government and Syrian civil society actors alike on Assad-era designations are numerous. Such engagement can assist them in reaching sound decisions regarding continued designations, new listings, and delistings. A joint advisory committee could be established to discuss specific designations and provide information relevant to them. The committee could be composed of sanctioning states' diplomats and Syrian government representatives, in addition to human rights activists, victims' organizations, and independent investigators.

Such a mechanism could encourage a constructive dialogue on how to address real and potential clashes between the transitional government's policies and Western designations. It could serve as a platform for critically reviewing the US decision to delist certain individuals and companies for whom this report found cause to think that they should instead be held accountable.

For future removals of sanctions, especially on second-tier officials who were listed solely because they were part of Assad's government, the joint advisory committee could provide sanctioning states with information relevant to such individuals' past conduct, in both their official capacities for which they were sanctioned and beyond. Before delisting sanctioned companies, sanctioning states' engagement with the

293- EU, European and UK officials stated that there had been no contact with the Syrian transitional government regarding individual designations. — Interviews with EU and UK officials, online, February, March and December 2025.

advisory committee may encourage the transitional government to be more transparent about how such companies were restructured or changed hands. These details could be checked by civil society actors' independent assessments and, in this way, inform better decisions on removing or maintaining designations. The advisory committee could also serve as a platform to consider additional designations of Assad's henchmen and businessmen who were not sanctioned but merit consideration, including some mentioned in this report and others beyond it.

It is high time that Western designations are no longer regarded as targeted sanctions *against* Syria but as designations *with* the new Syria in favor of accountability for the Assad regime's crimes. This change of perspective calls for close engagement with the Syrian transitional government, its successors, and civil society actors.

The proposed joint advisory committee may facilitate this engagement and at the same time encourage a dialogue between the Syrian transitional government and civil society actors, including victims' organizations, that thus far has proven to be far from satisfactory. Sanctioning states could use the advisory committee to explain and motivate their decisions, contributing to greater transparency and accountability for their own actions.

Finally, the participation of the EU, UK, and US in the advisory committee may enable them to better coordinate among themselves and be more coherent in their respective decisions to continue designating, newly designate, or delist individuals and entities when held against a shared standard of promoting accountability for the Assad regime's crimes.

Complementary measures for more effective designations

For designations to be as impactful as possible and contribute to accountability, a range of complementary measures is needed to enhance their effectiveness. Enforcement of targeted sanctions is key. And yet this is exactly the problem, as many of Assad's henchmen, businessmen, and their accomplices have moved to countries outside the sanctioning states' jurisdictions, often following or taking their assets with them. Equally challenging is that Syria's own capabilities to enforce targeted sanctions at home and abroad, and to pursue genuine transitional justice efforts more generally, are limited. Against this background, efforts should be made to actively enforce targeted sanctions within sanctioning states' own jurisdictions and to integrate the designation of individuals and entities more tightly into their foreign policies, diplomacy, judicial endeavors, and provision of aid.

While most of the assets of designated individuals and companies are believed to be outside the jurisdictions of the sanctioning states, indications are that some assets may still be hidden within them. In Part 2 we noted how financial middlemen acting on

behalf of the Assad regime and its accomplices appear to have tested European authorities to see whether assets could remain undetected even after sanctions had been imposed. This report also cited unconfirmed allegations in a classified document prepared by Syria's GID about Bassam Hassan holding millions of US dollars in a Greek bank account through a third person. Over the last few years, the EU has re-energized efforts to allow its member states' national Asset Recovery Offices better and faster access to financial information and bank accounts to trace assets derived from organized crime.²⁹⁴ These measures should be fully deployed to investigate and trace assets held by sanctioned individuals or in violation of EU designations.

Furthermore, the case of Adib Mayaleh, although admittedly involving a rare example of a Syrian EU-designated person residing in a European country (France), suggests that more should be done to detect, counter, and prosecute sanctions violations from within the EU. In addition, some sanctioned individuals associated with the Assad regime may have moved to Europe, the UK, and the US under false identities. We noted in this context that a thriving market in forged Syrian passports—and the Assad regime's efforts to cash in on high demand for passports generally—has made it difficult to distinguish fraudulent documents from genuine ones. Engagement by law enforcement agencies with expatriate Syrian communities is essential to help trace wanted and sanctioned Syrian individuals, enforce sanctions, and pursue legal steps. Border control agencies will have to be fully briefed on designated persons holding one or more foreign passports.

The key challenge remains that most of the designated persons and their assets are not in sanctioning states' jurisdiction and thus largely out of reach. This report has documented that most regime-linked designated persons who left Syria reside mainly in the UAE, Russia, and Lebanon. For targeted sanctions to effectively contribute to accountability, this poses some serious challenges.

In the case of Russia, there will be little willingness to act against Syrian individuals within its territory who are sanctioned by Western states. However, in this context it may be considered to add these Syrian designations to Russia-targeted sanctions packages and programs, to convey the message that hosting Syrian nationals accused of war crimes and gross human rights violations is unacceptable.

As for the UAE, the EU, UK, and US should make it clear that accommodating designated Syrian war criminals and their assets is a serious cause for concern despite the country's "significant progress" made in meeting Financial Action Task Force (FATF) criteria, which include countering UN sanctions evasion.²⁹⁵ US diplomatic pressure on the UAE has proven effective in the past. In 2021 the UAE extradited French-Syrian national Salah Habib to France immediately following his designation by the US. If

294- ["Security Union: Commission Welcomes Political Agreement on Providing Law Enforcement Better and Faster Access to Financial Information,"](#) European Commission, 5 June 2023.

295- The UAE was removed from the FATF grey list in February 2024. — ["Jurisdictions Under Increased Monitoring – 23 February 2024,"](#) Financial Action Task Force (FATF), 23 February 2024.

diplomatic pressure does not suffice, the US should consider third-party sanctions on states hosting designated individuals who were sanctioned under the Caesar Act.

Concerning Lebanon, the election of President Joseph Aoun and the formation of a new government led by Prime Minister Nawaf Salam in early 2025 may allow sanctioning states to more effectively engage Lebanese authorities about the presence of Syrian designated individuals and their assets. Where possible, reform and assistance led by the International Monetary Fund to the country's banking sector should be accompanied by efforts to sensitize the Lebanese government to the need to counter Syrian designated persons laundering their money through Lebanese financial institutions and registered companies.

Court prosecutions within the jurisdictions of sanctioning states could further embolden and widen the reach of targeted sanctions. For now, there are only two Syrian designated persons being prosecuted while present in one of the sanctioning states: Adib Mayaleh and Salah Habib, both currently residing in France. Both are facing charges of war crimes. Mayaleh's case has been complicated by jurisdictional issues regarding "functional immunity," on which several French courts have taken opposing views. Yet in July 2025 France's Supreme Court ruled that the trial should go ahead. Given our findings involving Mayaleh as detailed in Part 1 above, charges of violating EU sanctions may be added to the charge of war crimes or help to circumvent jurisdictional issues should these still arise. Habib was arrested in France in December 2021 and is currently being tried for providing the SSRC with materials used in the production of chemical weapons through his UAE-based company **Yona Star**. Court proceedings against him may also shed more light on the role of Bassam Hassan and others in the development and use of chemical weapons by the Assad regime.

All other court cases involving designated Syrian regime officials and accomplices held in sanctioning states have been conducted in absentia. These cases resulted in arrest warrants issued by Germany, France, and the US against key designated regime officials on charges of war crimes, including 21 such warrants in France alone.²⁹⁶ Most of these individuals were found to be residing in Russia, making extradition unlikely. Diplomats representing the Syrian transitional government reportedly requested in January 2025 that Moscow extradite Bashar al-Assad.²⁹⁷ In September 2025 the interim government issued its own arrest warrant for Assad.²⁹⁸ President Ahmad al-Sharaa is believed to also have asked Russia to extradite Assad and other high-ranking former regime

296- İlayda Çakırtekin, "[France Issues Arrest Warrants for Syria's Assad, Six Officials Over 2012 Journalist Killings](#)," Anadolu Agency, 2 September 2025. — Following several court cases in Germany, France, and the US, in absentia arrest warrants were issued against Bashar al-Assad, Maher al-Assad, Ali Mamlouk, Abdel Salam Mahmoud, Jamil Hassan, Bassam Hassan, Ghassan Abbas, Talal Makhoul, Ali Ayyoub, Ghassan Bilal, Muhamad Dib Zeitoun, Rafiq Mahmoud Shehadah, and others.

297- Samia Nakhoul and Timour Azhari, "[Russia Gambles to Keep Military Bases in Post-Assad Syria](#)," Reuters, 2 March 2025.

298- "[Syria Issues Arrest Warrant for Ousted President al-Assad](#)," Deutsche Presse-Agentur (DPA International), 27 September 2025.

officials during his visit to President Vladimir Putin in October 2025.²⁹⁹ No official Russian response was made public, and the requests appear to have fallen on deaf ears. The whereabouts of three other designated individuals facing arrest warrants are unknown.³⁰⁰

Talal Makhoul was also subjected to an arrest warrant. French investigators accuse him of complicity in the shelling of a media center in Homs in February 2012, which killed French journalist Rémy Ochlik and his American colleague Marie Colvin.³⁰¹ As noted in this report, Makhoul resides in Syria, where he appears to have reached a deal with the transitional government. A French request to the Syrian authorities to extradite him would put serious pressure on Sharaa to end that arrangement in favor of accountability. This could also apply to Abdul Jalil Mallah, a US-designated businessman who faced several UK court convictions. A UK extradition request, if honored, may provide access to his assets held in the Marshall Islands.

Another designated individual, Muhamad Majd Hussein Deiry, is wanted by the FBI for arms smuggling. In Part 3 of our report we detailed his involvement in a Lebanon-based company facilitating the resumption of flights to Damascus by Air Mediterranean. The US could pressure both the Lebanese government and the Syrian authorities to deport him and/or seize his assets. In addition, Bassam Hassan faces an arrest warrant in France; he resides in Lebanon. Here too, an extradition request would end impunity for one of the Assad regime's principal henchmen, should France be willing to wield its considerable influence in Lebanon.

In their current and future engagements with the new Syria, sanctioning states should practice what they preach. In early 2025, the US established contacts with Bassam Hassan to obtain information about the fate of American journalist Austin Tice, who disappeared in Syria in August 2012. As Tice is believed to have been held by armed groups linked to the NDF, CIA investigators were brought to Hassan. He reportedly told them that the regime had executed the journalist in 2013. His contacts with the CIA are likely to have allowed Hassan to move to Beirut to receive medical treatment there and live quietly despite being sanctioned and wanted for war crimes. The apparent arrangement involving the US that made this possible is eerily similar to the transitional government's dealmaking with Assad's henchmen, overriding accountability for the Assad regime's crimes when seemingly more pertinent interests required it. Such an approach gives the wrong signal to both the Syrian government and the Lebanese authorities—that ignoring or overruling individual designations is acceptable.

Equally, sanctioning states in their capacity as major donors to UN agencies should

299- Aleksandar Brezar, "[Syria's Al-Sharaa Seeks Extradition of Kremlin Ally al-Assad in First Moscow Trip](#)," Euronews, 15 October 2025.

300- These individuals are Abdul Salam Mahmoud, Ghassan Abbas, and Ghassan Bilal.

301- "[Syria/France – Ochlik/Bouvier/Colvin Case: French Courts Issue Seven Arrest Warrants for Senior Syrian Officials](#)," International Federation for Human Rights (FIDH), 2 September 2025.

instruct the UN to be fully transparent about its procurement partners and to no longer contract designated individuals and companies for services related to humanitarian assistance operations in Syria. The UN is not formally bound by sanctions imposed by entities other than the UN Security Council, but it is not unusual for donors to earmark their aid or impose certain conditions. Throughout the Syrian conflict, UN agencies have contracted numerous designated companies despite their links to and complicity with the Assad regime.³⁰² As UN agencies have not yet reported on their procurement contracts for 2025, it is not known whether such contracts were discontinued after the collapse of the Assad regime.³⁰³ More generally, and for future purposes, sanctioning states should refrain from contracting or working with designated companies and businessmen if or when they become involved in, or provide funding for, reconstruction projects in the new Syria.

International assistance for the new Syria to rebuild will be crucial for it to decisively turn a page in the country's history of authoritarian rule, bloodshed, and destruction. Two main obstacles that the new government encountered in delivering on its transitional justice promises could be overcome with international help. In addition to reminding the Syrian transitional government of the importance of accountability, the EU, UK, and US in particular carry a key responsibility to assist the new Syria's efforts to rebuild its judiciary so that it is capable of prosecuting Assad's henchmen and their accomplices. More generally, international support in overcoming the economic constraints that have thus far thwarted corporate justice in Syria will be indispensable. Syria needs international assistance to get back on its feet and build an economy where opportunities arise for new entrepreneurs and ordinary Syrians, not for corrupt businessmen and henchmen implicated in the crimes of the past.

302- Syrian Legal Development Program and OPEN, Shaar, "[UN Procurement Contracts in Syria](#)."

303- The World Health Organization (WHO) reportedly continued to hire Shorouk for Protection and Guarding, a non-designated security company owned by Wa'il al-Haw and linked to Maher al-Assad and the Fourth Division. Al-Haw is also a Middle East agent for the Russian security firm SLS and is believed to have acted as a front for Muhammad Hamsho. There have been no reports of Shorouk being restructured or changing ownership. In its reporting for 2024 and earlier years, the WHO withheld the names of many procurement partners citing "privacy reasons." Shorouk personnel continue to guard the Four Seasons Hotel in Damascus, and the company is still recruiting on social media. — "[Wa'il al-Haw](#)" (in Arabic), Manhom.com, accessed 1 November 2025; "[The United Nations Paid USD 83,000 to a Security Company Linked to al-Assad After His Fall!](#)" (in Arabic), Zaman al-Wasl, 20 May 2025; Wael Alalwani, "[His ownership of Shorouk Security Company through his front 'Wa'il al-Haw'...](#)" (in Arabic), X post, 11 January 2025; "[SLS-Group Homepage](#)" (in Russian), SLS-Group, accessed 1 November 2025; "[2024 Awarded Contracts for Goods](#)," World Health Organization, PDF, accessed 1 November 2025; "[Shorouk for Protection and Guarding](#)" (in Arabic), Facebook profile page, accessed 1 November 2025.

Appendix 1: Known whereabouts of sanctioned individuals affiliated with the Assad regime

(Whereabouts since 8 December 2024)

Syria

Name		Short bio	Whereabouts	Level of confidence
Abdellatif Hamideh (EU, UK, US sanctioned)	عبد اللطيف حميدة	Businessman accused of involvement in the captagon trade, close to Firas al-Shehabi (another designated businessman).	In January 2025, Hamideh was appointed deputy head of Aleppo's Chamber of Commerce. While still staying in Syria, Hamideh lost his position at the board of Aleppo's Chamber when the latter was reorganized in April 2025. He attended several meetings involving businessmen, as reported in local media. ³⁰⁴	High
Abdul Jalil Mallah (US sanctioned)	عبد الجليل ملاح	Syrian businessman active in maritime transport, formerly operating from Greece, accused of links with and providing services to IRGC and Houthi operatives. Facing several court convictions in the UK.	Residing in Damascus, per UK court documents. ³⁰⁵	High
Abdullah Berri (EU sanctioned)	عبدالله بري	Head of the Berri family militia. In charge of pro-government militias involved in the violent crackdown on the civilian population in Aleppo in 12–2011 and after.	He still resides in Aleppo, al-Nayrab, where the Berri clan originates. The clan reportedly received guarantees that they would not be pursued if they laid down their arms when HTS and other armed groups seized control of Aleppo in November 2024. ³⁰⁶	Medium

304- Samir Ahmad Nuhaili, “[The person who appeared behind the regime’s shabiha after they occupied Andan on 16-2-2020 is Mustafa Kuwayya...](#)” (in Arabic), Facebook post with video, 0:47, 11 January 2025; “[Aleppo Industrialists Comment on the ‘Chamber of Industry’ Scandal: Is There No One but Bashar al-Assad’s Financier to Manage It, and How Will Sanctions Apply When One of the Chamber’s Officials Is Sanctioned for Captagon?](#)” (in Arabic), AksAlser.com, 10 January 2025; “[Abd al-Latif Hamidah](#)” (in Arabic), Facebook profile page, accessed 1 November 2025; “[‘Shabiha Industrialist’ Announces His Resignation from the Aleppo Chamber of Industry Days After His Appointment Amid Public Rejection](#)” (in Arabic), Shaam Network, 11 January 2025; “[The President of the University of Aleppo Received an Official Delegation from the Aleppo Chamber of Industry, Headed by the Vice President of the Chamber](#)” (in Arabic), Aleppo University – News, 17 July 2025; “[Formation of a New Board of Directors for the Aleppo Chamber of Industry](#)” (in Arabic), Hashtag Syria, 9 January 2025.

305- Kostas Koukoumakas, Tariq Tahir, and George Schinas, “[Syrian Shipowner in Piraeus on Sanctions List](#),” incubator for Media Education and Development (iMedD): Content, 26 February 2025; Sam Chambers, “[UK Court Hands Jail Term to Syrian Shipowner](#),” Splash247.com, 31 May 2024.

306- Interviews with a former regime insider, February and July 2025.

Ali Barakat (EU, UK, US sanctioned)	علي بركات	103rd Brigade of the Republican Guard Division. Promoted to Major General in 2017.	In early February 2025 activists claimed to have found Ali Barakat's ID card, claiming that he was killed. This cannot be confirmed. ³⁰⁷	Low
Ali Haidar (EU and UK sanctioned, US delisted)	علي حيدر	Head of the National Reconciliation Agency and former State Minister for National Reconciliation Affairs. Chair of the Intifada wing of the Syrian Social Nationalist Party.	He is still in Syria (Masyaf and Damascus), per his personal Facebook account. ³⁰⁸	High
Ali Najib Ibrahim (EU sanctioned)	علي نجيب ابراهيم	Leading regime-linked businessman, primarily active in telecommunications and tourism. He co-owned telecommunications operator al-Wafa JSC with Yassar Ibrahim.	In May 2025 Syriatel's annual report still lists Ali Najib Trading Establishment among companies contracting with Syriatel. A media investigation alleged that Ibrahim invests in Junada Resort in Tartous via his shares in Sawari Tourism Investments. ³⁰⁹	High
Amer Salem (EU sanctioned)	عمرو سالم	Minister of Internal Trade and Consumer Protection	Salem reportedly appeared with members of the transitional government in a hotel in Damascus and gave an interview to the Spectator explaining why he did not leave Syria. ³¹⁰	High

307- Thuwar al-Firdaws al-Qudama', "[This is the ID of Major General Barakat Ali Barakat...](#)" (in Arabic), Facebook post, 8 February 2025.

308- "[Ali Haidar](#)" (in Arabic), Facebook profile page, accessed 1 November 2025. — Confirmed by a former regime insider, July 2025.

309- "[Annual Report](#)" (in Arabic), Syriatel, 26 May 2025, accessed 1 November 2025; Sodra al-Hariri, "[Contradictory accounts between the Ministry of Tourism and the resort administration: 'Junada'... a non-transparent investment that raises controversy](#)" (in Arabic), Enab Baladi, 20 July 2025.

310-Daniel Thorpe, "[Bashar was my friend: the former Assad minister on why he didn't flee Syria](#)" (link), The Spectator (UK), 25 January 2025.

Amru Armanazi (EU, UK, and US sanctioned)	عمرو أرمنازي	Director General of the Syrian Scientific Studies and Research Centre (SSRC) for 22 years until 2021, and as such involved in and/or responsible for the production of barrel bombs and chemical weapons.	A New York Times investigation found he still lives in Damascus. Other sources claim he is in Dubai. ³¹¹	Medium
Anas Talas (EU and UK sanctioned)	أنس طلاس	Prominent regime-linked businessman who partnered with other leading pro-regime businessmen including Muhamad and Rami.	Anas Talas stayed on as a board member of the Damascus Chamber of Commerce until April 2025. The Chamber's social media mentioned several trade events involving Anas Talas. As he also owns and runs businesses in Dubai he is believed to go back and forth between the UAE and Syria. However, his personal social media pages only refer to him staying in the UAE. ³¹²	High
Atef Najib (EU, UK, and US sanctioned)	عاطف نجيب	Former Head of Political Security Directorate in Daraa. He played a key role in the violent clampdown on early protests against the regime in 2011.	Atef Najib was arrested and detained by transitional government security forces at the end of January 2025. On 7 August 2025 Atef Najib appeared in a video showing an investigative judge interrogating him. ³¹³	High

311- [“One of Chemical Attacks Architects to Head Syria’s Research Center,”](#) Zaman al-Wasl, 30 May 2021, accessed 1 November 2025; Interview with a former regime insider, July 2025; Zayd Armanazi, Profile Page, LinkedIn, accessed 1 November 2025; Erika Solomon et al., [“The Vanishing Act: How Assad’s Top Henchmen Fled Syria, and Justice,”](#) The New York Times (subscriber-only content), 16 October 2025.

312- Damascus Chamber of Commerce, [“Distinct Presence of Syrian Food Industry at ‘Gulfood,’ the World’s Largest Food Exhibition...”](#) (in Arabic), Facebook post, 17 February 2025; [“Government Reshuffles Chambers of Commerce”](#); Anas Talas, [Profile Page](#), Instagram, accessed 1 November 2025; Interview with a former regime insider, July 2025.

313- Walid al-Nofal, [“Who Is Atef Najib, the Man Who Fanned the Flames of Revolution in Daraa?”](#) Syria Direct, 31 January 2025; Al Jazeera Arabic, [“Atef Najib... the Torturer of Daraa’s Children in the Custody of the New Syrian Security”](#) (in Arabic), YouTube video, 3:19, 1 February 2025; Live TikTok, [“Where Is Atef Najib? The Damascus Government Must Clarify the Rumors of His Escape—Someone Claims Atef Paid Money and Fled”](#) (in Arabic), YouTube video, 17:42, 11 June 2025; [“The Syrian Ministry of Justice Publishes Footage of Investigations With Four Prominent Regime Figures”](#) (in Arabic), Al Jazeera, 8 August 2025; Syrian Ministry of Justice, [“Toward Justice... Investigations Under the Umbrella of the Judiciary”](#) (in Arabic), Facebook post with video, 0:44, 7 August 2025.

Badi Mu'alla (EU, UK, and US sanctioned)	بديع معلا	Brigadier General and pilot, Commander of 63rd Brigade of the Syrian Air Force. Responsible for indiscriminate bombing of civilian targets including by dropping chemical loads in 2014-15	Likely residing in Jableh. ³¹⁴	Medium
Bassam Tu'ma (EU and UK sanctioned)	بسام طعمة	Minister of Oil and Mineral Resources	In May 2025, Tu'ma was interviewed by the Arabic Independent news site, seemingly from Damascus. ³¹⁵	Medium
Bilal al-Na'al (EU sanctioned)	بلال النعال	Prominent regime-linked businessman, former MP, partnered with other regime-linked businessmen and officials including Fadi Saqr.	Bilal al-Na'al reportedly returned to Damascus in February 2025, and is said to have reached a settlement with the transitional government allowing him to keep at least part of his business assets. Al-Na'al also has a residency permit for Oman. ³¹⁶	High
Darem Taba'a (EU and UK sanctioned)	دارم طباع	Minister of Education	In July 2025 Taba'a was arrested in Damascus on charges of corruption and bribery. An investigating judge ordered his release, but the Public Prosecution appealed and he remained detained. ³¹⁷	High
Diala Barakat (EU sanctioned)	ديالا بركات	Minister of State / Minister of Culture	The transitional government denied news on her appointment as Minister of Culture. Yet she did for some time oversee the Ministry, and remains in Syria. ³¹⁸	High

314- Interview with a former regime insider, July 2025.

315- Hiam Ali, "[Are Syria and Iraq Moving to Revive the Joint Oil Pipeline?](#)" (in Arabic), Independent Arabia, 5 May 2025.

316- Halab Today TV, "[Syrian Businessman Bilal al-Na'al Arrives in Damascus After Leaving...](#)" (in Arabic), Facebook post, 16 February 2025; Syrian Industry News, "[The Path of Settlement Is Crowded With Businessmen and Figures Close to the Assad Regime](#)" (in Arabic), Facebook post, 23 February 2025; Omar Abu al-'Abd, "[The Militiaman and Syrian Businessman Supporting the Barrel-Bomb Regime...](#)" (in Arabic), Facebook post, 17 February 2025; Interview with a former regime insider, July 2025.

317- "[An Appeal Keeps Former Education Minister Darem Tabbaa in Detention](#)" (in Arabic), Zaman al-Wasl, 5 August 2025.

318- "[The Fate of Syria's Ministry of Culture Under Scrutiny: What About Diala Barakat's Role?](#)," Profile News, 23 January 2025; Abdulaziz al-Khalifa, "[Pulse-Testing Politics... This Is How the New Syrian State Tests the Street's Reaction](#)" (in Arabic), Takkad, 22 November 2025.

Fadi Saqr / “Fadi Ahmad” (EU and UK sanctioned)	فادي صقر / فادي أحمد	Fadi Saqr was a leader of the National Defence Forces (NDF) militia in Damascus and stands accused of having overseen a massacre in the Tadamon neighborhood and other violence against civilians	Fadi Saqr struck a deal with HTS forces as soon as they approached Damascus and overthrew the regime. He began to mediate between the interim authorities and remnants of the Assad regime. In June 2025 a member of the transitional government’s National Committee for Civil Peace confirmed that Fadi Saqr played a role in negotiations with these remnants and their families “to prevent bloodshed and to enhance civil peace.” ³¹⁹	High
Fahad Darwich (US sanctioned)	فهد درويش	Prominent regime-linked businessman and former president of the Joint Syrian-Iranian Chamber of Commerce.	Several sources confirmed that Darwich is still in Damascus, apparently after reaching a USD 5 million settlement with the transitional government. He frequently travels to Beirut and Dubai. ³²⁰	High
Faisal al-Miqdad (EU, UK, and US sanctioned)	فيصل المقداد	Former Syrian UN representative, Deputy Foreign Minister, Minister of Foreign Affairs since November 2020 and deputy president since September 2024.	Faisal al-Miqdad stayed in Damascus. At the end of December 2024 he issued a statement calling for national unity, but without apologizing for his role during the Assad years. He was reportedly sighted in May 2025 in a restaurant in Damascus. ³²¹	High
Farouq al-Shara’ (EU and UK sanctioned, US delisted)	فاروق الشرع	Former Syrian Vice-President until 2014, Minister of Foreign Affairs until 2006, and member of the Ba’ath party’s Central Command until 2013.	Farouq al-Shara’ stayed in Damascus. At the end of December 2024 he met with President Ahmad al-Sharaa, who invited him to attend the “national dialogue” conference. However, Farouq al-Shara’a did not attend the National Dialogue meeting when it was held at the end of February 2025. ³²²	High

319- [“Between Settlements and Exile, the Fate of Assad Regime Cronies,”](#) The Syria Report (subscriber-only content), 6 November 2025.

320- [“Former Regime-affiliated Businessmen Seek to Save Their Businesses,”](#) The Syria Report (subscriber-only content), 2 April 2025; Interview with a former regime insider,

321- [“A Late Statement: al-Miqdad Appears Through the Window of the National Dialogue”](#) (in Arabic), Enab Baladi, 24 December 2024; Syria News Network, [“In a Shocking and Painful Scene, Faisal al-Miqdad...”](#) (in Arabic), X post (formerly Twitter), 23 May 2025.

322- [“Syria’s New Leader Invites Former Vice President Farouq al-Sharaa to National Dialogue Conference,”](#) LBC International, 22 December 2025.

Firas Hassan Qaddur (EU and UK sanctioned)	فراس حسن قدور	Minister of Petroleum and Mineral Resources	In July 2025 Qaddur was questioned by the transitional government's Financial Oversight Authority about oil contracts with Russian companies. ³²³	High
Hashim Anwar al-Aqqad (EU and UK sanctioned)	هاشم أنور العقاد	Leading regime-linked businessman owning shares in multiple companies including Pro-Guard (suspected of recruiting volunteers joining Russian forces in Ukraine), founding partner of the Golden Gate Company (linked to the prominent Marota real estate project), MP	On 16 March 2025 Syrian media and business platforms reported the kidnapping of Hashim Anwar al-Aqqad by unidentified gunmen in Mezzeh district of Damascus. On 2 May his wife, Maysa Debj, issued a statement confirming that her husband was missing. Syrian authorities have not issued any official statement or comment regarding his fate. ³²⁴	High
Hisham Muhamad Mamdouh al-Sha'ar (EU and UK sanctioned)	هشام محمد ممدوح الشعار	Minister of Justice	Staying in Syria, he retired in January 2025. ³²⁵	High
Imad Abu Zureiq (EU, UK, and US sanctioned)	عماد ابو زريق	Imad Abu Zureiq was a leading member of a regime-affiliated militia in southwest Syria, accused of involvement in the illicit trade in captagon. Formerly a rebel leader, he turned sides by working for the MID in Daraa.	Imad Abu Zureiq is reported to have stayed in and around the Nassib border crossing with Jordan and to continue his involvement in the captagon trade. He reportedly had meetings with HTS officials, including President Ahmad al-Sharaa, at the presidential palace on 21 December 2024. His restaurant at the Nassib border crossing reopened in May 2025. ³²⁶	Medium

323- Zaman al-Wasl, "[Questioning Former Oil Minister Friras Qaddour...](#)" (in Arabic), X post, 28 July 2025.

324- "[Assad's Businessmen: Hashim Anwar al-Akkad](#)," ProJustice.org, accessed 1 November 2025; "[Kidnapping of Syrian Businessman Hashim al-Akkad in Damascus](#)" (in Arabic), Shaam Times, 17 March 2025; "[Between Settlements and Exile, the Fate of Assad Regime Cronies](#)."

325- Nabil Ibrahim, "[Referral of Hisham Muhammad Mamdouh al-Shaar \(Former Minister of Justice\) to Retirement](#)" (in Arabic), Facebook post, 26 January 2025.

326- "[BRIEF: Arms & Drug Smuggling in Syria After Assad](#)," ETANA Syria, accessed 1 November 2025; "[A Meeting Between the Military Operations Directorate and Factions, Including Leaders From Daraa—Who Are They?](#)" (in Arabic), Daraa24, 21 December 2024; Lemma Shehadi, "[Captagon Smuggler Welcomed by Regime in Damascus Despite Crackdown](#)," The National, 29 March 2025; Syria TV, "[A New Restaurant at the Nasib Crossing Belonging to Former Leader Imad Abu Zureiq Sparks Controversy... What Are the Details?](#)" (in Arabic), Instagram post with video, 23 May 2025; Natalie Ecanow and Nam Tran, "[Syria's Captagon Industry Continues to Flourish Despite New Regime Crackdowns](#)," Long War Journal (FDD), 23 May 2025; Syria TV, "[A Restaurant at the Nasib Crossing Belonging to Former Leader Imad Abu Zureiq Sparks Controversy](#)" (in Arabic), YouTube video, 2:04, 23 May 2025.

Issam Anbouba (EU and UK sanctioned)	عصام انبوبة	Influential businessman active in oil refinery, agriculture, wheat trade, chemicals, banking, real estate and tourism, shipping and transportation. He had links to Rami Makhlouf and Nader Qala'i and was one of the largest agents for Syriatel. Founding member and shareholder of Cham Holding. With his sons (Mark, Rani and Danny), Issam Anbouba owns and runs companies in Lebanon and is active in olive oil production and an offshore trading company named Silo Serve.	Anbouba remained in Syria despite having strong links with the UAE and Lebanon. He continued to publicly comment on economic developments in Syria. ³²⁷	High
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327- "Profile: Issa al-Zaydi," OpenSanctions, accessed 1 November 2025; "Issam Anbouba," Manhom.com, accessed 1 November 2025; Yahya Madlej, "[Industrialist Issam Anbouba: After Sanctions Are Lifted, Syria Will Witness Economic and Developmental Revival](#)" (in Arabic), Al-Ouruba, 22 May 2025.

Issam Shammout (EU, UK and US sanctioned)	عصام شموط	Owner of Cham Wings Airlines and head of the Shammout Group, active in multiple sectors. He was closely associated with Rami Makhoul. Cham Wings was accused of involvement in arms and drugs smuggling and transporting Iranian Revolutionary Guards fighters and other militiamen and mercenaries to Syria and Libya. Shammout owns or co-owns Shammout Auto, Noural Aluminium, Shammout Heights for building materials, a tourism transportation company, Damascus for Industry and Trade, an industrial tools and machinery company, and another company for shipping and cargo services	Issam Shammout reportedly reached a settlement with the transitional government, allowing him to retain half of his shares in Cham Wings Airlines, re-named Fly Cham, and keep his automobile concession. ³²⁸	Medium
Iyad Muhamad al-Khatib (EU and UK sanctioned)	اياد محمد الخطيب	Minister of Communications and Technology	At the end of December 2024, he took part in a meeting with the new Minister of Telecommunications to review and improve telecommunications services. ³²⁹	High
Jassem Muhamad Zakaria (EU and UK sanctioned, US delisted)	جاسم محمد زكريا	Minister of Labour and Social Affairs	Lives in Syria. He was appointed by the transitional government as a member of a legal committee studying the status of Palestinians in Syria. ³³⁰	High

328- [“Assad’s Businessmen: Issam Shammout,”](#) ProJustice.org, accessed 1 November 2025; Azhari and Dalatey, [“Special Report: Syria Is Secretly Reshaping Its Economy. The President’s Brother Is in Charge.”](#)

329- [“Meeting to Review and Improve Telecommunications Services in Syria”](#) (in Arabic), Syrian Ministry of Communication and Information Technology, 28 December 2024.

330- Interview with one of his relatives, Damascus, May 2025; Adnan Ali, [“Syria: A Committee to Review Laws Related to Palestinian Refugees”](#) (in Arabic), The New Arab, 10 September 2025.

Jawdat Ibrahim Safi (EU and UK sanctioned)	جودت ابراهيم صافي	Military commander with the rank of brigadier-general, served in the Fourth Division, former head of Political Security Directorate in Aleppo and in As-Suwayda.	Reportedly residing in Jableh, Latakia governorate. ³³¹	Medium
Kamal Sheikha (EU, UK, and US sanctioned)	كمال شيخة	Minister of Water Resources	He still holds a position at Yarmouk Private University as Dean of the Faculty of Civil and Environmental Engineering. ³³²	High
Khaldoun al-Zu'bi (UK sanctioned)	خلدون الزعبي	Leading regime-linked businessman, vice-president of Aman Holding owned by Samer Foz (both designated).	Khaldoun al-Zu'bi commented on the fate of his business partner Samer Foz from the Four Seasons Hotel in Damascus. He reportedly negotiated with the transitional government about a settlement for himself and for Foz, but it is unclear whether a deal was reached. ³³³	High
Kinda al-Shammatt (EU and UK sanctioned, US delisted)	كندة الشماط	Minister of Social Affairs (2013-15)	Reportedly implicated in missing children scandal, arrested by transitional government forces on 6 July 2025. ³³⁴	High

331- Interviews with a former regime insider, February and July 2025.

332- [“Faculty of Civil and Environmental Engineering”](#) (in Arabic), Yarmouk Private University, accessed 1 November 2025.

333- Timour Azhari, [“Exclusive: Syria’s New Leaders Zero In on Assad’s Business Barons,”](#) Reuters, 13 February 2025; Hussein al-Khatib, [“Why Are the Fronts of the Former Regime’s Economy Being Recycled in Syria?”](#) (in Arabic), Noon Post, 16 January 2025.

334- [“Syrian Interior Ministry Confirms Arrest of Two Former Ministers over Disappeared Children Case,”](#) The Syrian Observer (source: Enab Baladi), 8 July 2025.

Khalid Bassam al-Zubeidi (EU and UK sanctioned, US delisted)	خالد الزبيدي	Leading regime-linked businessman, former MP. Chairman of Aman company owned by Samer Foz. He was associated and/or partnered with the late Nader Qala'i, a front for Rami Makhoul, and with Yassar Ibrahim (both designated).	Khalid al-Zubeidi was reportedly arrested by HTS forces when he tried to flee to Lebanon. A few days earlier, on 20 December 2024, he appeared in a media interview. A few months later he seems to have been released. He retains ownership of his companies, including Agar Investment Company, Al Zubaidi company and Al Zubaidi & Al Taweet Contracting Company, Zubaidi Development Company, and Enjaz Investment Company. While residing in Damascus he travels regularly to Algeria.³³⁵	Medium
Khaled Qaddour (EU, UK, and US sanctioned)	خالد قدور	Leading regime-linked businessman with ties to Maher al-Assad and the Fourth Division.	Khaled Qaddour is believed to have moved back to Damascus after he reportedly fled to Lebanon where he was said to have stayed at the Mövenpick Hotel in Beirut. He reportedly negotiated with the transitional government about a settlement. He regularly travels to Beirut, Dubai, and Moscow.³³⁶	High

335- [“Former Regime-affiliated Businessmen Seek to Save Their Businesses.”](#); Al-Iqtisadi Syria, [“Get to Know Businessman Khaled al-Zubaidi...”](#) (in Arabic), Facebook post, 27 December 2024; Akhbar al- Asima, [“Khaled al-Zubaidi Arrested While Attempting to Flee...”](#) (in Arabic), Facebook post, 26 December 2024; Al Arabiya, [“Former Syrian MP Khaled al-Zubaidi: Bashar and Maher al-Assad Personally Oversaw the Drug Trade...”](#) (in Arabic), X post with video, 8:49, 19 December 2024; Al Mashhad, [“Khaled al-Zubaidi: I Was Expelled from the People’s Assembly within Three Days”](#) (in Arabic), Facebook post with video, 0:52, 13 May 2025; Al Mashhad, [“Khaled al-Zubaidi: I Never Met Bashar al-Assad... and This Is the Truth About My Relationship With Ahmad al-Sharaa — Arab Studio”](#) (in Arabic), YouTube video, 29:32, 12 May 2025; Interview with a former regime insider, July 2025.

336- [“Where’s the Gold?: How the Assads Sucked Syria Dry,”](#) France 24, 3 March 2025; [“Top Security Officials Fled Syria Shortly Before Assad’s Fall,”](#) The Syrian Observer (source: Sawt al-Asima), 12 December 2024; [“Hezbollah Said to Have Helped Assad Officials Flee to Lebanon, Sparking Furor in Beirut”](#); Sammy Ketz and Maher al-Mounes, [“How Assad’s Inner Circle Fled Syria After His Fall,”](#) Barron’s, 21 December 2024; [“Return of Assad-Linked Businessmen: Economy Is al-Sharaa’s Priority”](#) (in Arabic), Al-Akhbar, 15 January 2025; al-Khatib, [“Why Are the Fronts of the Former Regime’s Economy Being Recycled in Syria?”](#); Interview with a former regime insider, July 2025.

Lina Mohammed Nazir al-Kinayeh (US delisted)	لينا محمد نذير الكناية	High-ranking official at the presidential palace and advisor to President Bashar al-Assad. Provided personal and financial services to First Lady Asma al-Assad. Owned or controlled four companies, three of which were designated. She is married to former MP Humam al-Masouti (US sanctioned) with whom she was allegedly involved in corruption in the hospital sector. She is believed to have been associated with Muhamad Hamsho and Samer al-Dibis (both designated).	Lina al-Kinaya fled to Beirut a few days after the fall of the regime, before being recalled by the transitional government to work at the palace. A few weeks later she was dismissed and her assets were confiscated. She now moves between Damascus and Beirut. ³³⁷	High
Maan Jadid (EU and UK sanctioned)	معن جديد	Commander in the Presidential Guard, involved in violence in Homs	He is thought to remain in an undisclosed location within Syria, likely around Homs. ³³⁸	Medium

337- Abdulazim Almgarbel, Mohammed Said Masry, and Khalid al-Terkawi, "[The Economy of the Syrian Regime: Approaches and Policies 1970–2024](#)," Jusoor for Studies, accessed 1 November 2025; Georges Malbrunot, "[Can You Imagine Such Stupidity?: How Bashar al-Assad Torpedoed an Offer of Negotiations With the US](#)," X post, 15 March 2025; Interview with a former regime insider, July 2025.

338- Interview with a former regime insider, July 2025.

Mahmoud Abdulilah al-Dj (EU and US sanctioned)	محمود عبد الله الدج	Mahmoud al-Dj is a regime-linked businessman who owns several companies active in different sectors including transport, logistics and tourism. He allegedly facilitated illicit transactions between regime-affiliated persons and entities in Syria and Eastern Libya, including in relation to narcotics and to the shipments of arms and mercenaries.	As Mahmoud al-Dj's main company, Al-Dj Group, is still operating in Damascus, he is likely to reside in Syria. Al-Dj travels regularly to Dubai and Beirut. The company's branch in Libya also is still operational. One or more of his companies are likely involved in two foreign private airlines which recently resumed international flights from Damascus (see Appendix 2). ³³⁹	High
Mazen al-Tarazi (EU and UK sanctioned)	مازن التريزي	Leading regime-linked businessman owning or controlling several companies in Syria, Lebanon, Kuwait, and the UAE. Active in tourism, restaurants, advertising, media, oil, construction and a private airline company. Associated and/or partnered with Samer Foz (designated) and financially supported pro-regime fighters and their families.	Mazen al-Tarazi is believed to be staying at the Sheraton Hotel in Sednaya (near Damascus), which he owns. His own social media accounts indicate the UAE as his place of residence, where he owns several companies. Mazen al-Tarazi also holds British and Canadian citizenships, allowing him to travel relatively freely. He regularly travels to Beirut and Kuwait. ³⁴⁰	Medium

339- Interview with a former regime insider, July 2025; Muhamad Basiki, Ioana Lolodi, Nikos Morphoneus, Sophia Torрати, and Lorenzo de Stassi, [“The Greek ‘Mediterranean Air’: The Story of a Company Flying to Damascus in Cooperation With Individuals Accused of Involvement in the Arms and Migrant Trade”](#) (in Arabic), Daraj Media, 2 August 2025.

340- Conversation with security guards at a building owned by Mazen al-Tarazi, Damascus, March 2025; Mazen al-Tarazi, [Profile Page](#), Facebook, accessed 1 November 2025; [“Assad’s Businessmen: Mazen al-Tarazi,”](#) ProJustice.org, accessed 1 November 2025; Interview with a former regime insider, July 2025.

Mizar Sawwan (EU and UK sanctioned)	ميزر صوان	Major General, a senior officer and commander of the 20th Division of the Syrian Air Force, accused of ordering indiscriminate bombing of civilian areas.	Mizar Sawwan was arrested on 25 June 2025 by security forces linked to the transitional government. ³⁴¹	High
Muhamad al-Jleilati (EU and UK sanctioned, US delisted)	محمد الجليلاتي	Minister of Finance	Claiming that he always opposed the corruption of the Assad regime, he wrote an open letter to President Ahmad al-Sharaa complaining about being prevented from travel. He is a professor at the Faculty of Economics at Damascus University. ³⁴²	High
Muhamad Amer Mardini (EU and UK sanctioned)	محمد عامر مارديني	Minister of Higher Education	He remains in Syria and is a member of the Faculty of Pharmacy at Andalus private university. ³⁴³	High
Muhamad Ghazi Jallali (EU and UK sanctioned)	محمد غازي الجلاي	Prime Minister and former Minister of Communications and Technology	Jallali remains in Syria, after he oversaw the handing over of power to the transitional government. ³⁴⁴	High

341- [“Biography of the ‘Enemy of the Two Ghoutas’: Meizar Sawwan, the Pilot Who Requested Entire Cities and Villages Be Wiped Off the Map”](#) (in Arabic), Zaman al-Wasl, 25 July 2016; Zaman al-Wasl, [“The Internal Security Directorate in the Harasta Area of Rural Damascus Arrests...”](#) (in Arabic), Instagram post, 25 June 2025.

342- Dr Muhamad al-Jleilati, [“Mr. President of the Republic...”](#) (in Arabic), Facebook post with video, 2:43, 8 April 2025.

343- [“Faculty Members of the College of Pharmacy”](#) (in Arabic), Andalus University, accessed 1 November 2025.

344- [“Syrian Rebel Chief: Former PM Will Supervise State Bodies Until Hand Over,”](#) Reuters, 8 December 2024; [“First Statement by the Syrian Prime Minister After Opposition Factions Claim Control of Damascus”](#) (in Arabic), CNN Arabic, 7 December 2024; [“Former Syrian PM Reveals Internal Dynamics of Assad Regime’s Final Days,”](#) Kurdistan24, 9 December 2024.

Muhamad Hamsho (EU, UK, and US sanctioned)	محمد حمشو	Leading regime-linked businessman, former MP, owns or controls several companies including in scrap metal processing. Allegedly worked with and supported pro-regime militias, associated with Maher al-Assad, his brother-in-law, and the Fourth Division.	Since his return from the UAE, Muhamad Hamsho has stayed in his villa in al-Malki neighborhood, Damascus, from where he has been negotiating a “settlement” with the transitional government. ³⁴⁵ He reportedly handed over 80 percent of his USD 640 million in assets, including a steel processing plant. Yet other companies registered in the names of his relatives were exempted. ³⁴⁶	High
Muhamad al-Shaar (EU, UK and US sanctioned)	محمد الشعار	Former Interior minister and senior official with the Political Security Directorate	Reportedly handed himself in to security forces linked to the transitional government. He gave a televised interview after his arrest saying his “conscience is clear.” Interim authorities said he will be tried in court as one of the first former regime officials. On 7 August 2025 Muhamad al-Shaar appeared in a video showing an investigative judge interrogating him. ³⁴⁷	High
Muhamad Kanjo Hassan (EU, UK and US sanctioned)	محمد كنجو حسن	Director of the Military Judiciary, responsible for field courts in Sednaya prison, and the issuance of death sentences against detainees.	Reportedly arrested in January 2025 by security forces linked to the transitional government. ³⁴⁸	High

345- Interviews with a former regime insider and a Syrian journalist, Damascus, May 2025; Ketz and al-Mounes, “[How Assad’s Inner Circle Fled Syria After His Fall](#)”; “[Former Regime-affiliated Businessmen Seek to Save Their Businesses](#)”; “[Maxim Khalil Criticizes the Presence of Corrupt ‘Money Whales’ in Damascus and Calls on the New Government for Transparency](#)” (in Arabic), Shaam Network, 18 January 2025; “[A History of Corruption and Financing the Ousted Regime: Debate Surrounds the Return of Muhammad Hamsho to Damascus Under a ‘Settlement’](#)” (in Arabic), Shaam Network, 12 January 2025; CNBC Arabia, “[Syria’s Minister of Economy and Foreign Trade, Basel Abdel Hanan, Explains...](#)” (in Arabic), Facebook post with video, 1:01, 13 January 2025; “[Between Settlements and Exile, the Fate of Assad Regime Cronies.](#)”

346- Azhari and Dalatey, “[Special Report: Syria Is Secretly Reshaping Its Economy. The President’s Brother Is in Charge](#)”; Interviews with businessmen and a government broker in Damascus, June 2025.

347- Manahel Alsahoui, “[‘The Butcher of Tripoli’: Syrian Minister Mohammed al-Shaar Claims ‘A Clear Conscience’](#),” Daraj Media, 6 February 2025; AlHadath, “[Former Syrian Interior Minister Reveals New Details About the ‘Crisis Cell’](#)” (in Arabic), YouTube video, 9:04, 4 February 2025; “[Fog of Justice: The ‘Civil Peace’ Response on the Trial of al-Shaar and Najib Raises Questions About the Seriousness of Holding Symbols of the Assad Regime Accountable](#)” (in Arabic), Zaman al-Wasl, 10 June 2025; “[The Syrian Ministry of Justice Publishes Footage of Investigations With Four Prominent Regime Figures](#)” (in Arabic); Syrian Ministry of Justice, “[Toward Justice... Investigations Under the Umbrella of the Judiciary](#)” (in Arabic).

348- Ali Darwish, “[What Is the Risk Posed by the Disappearance of Former Regime Officers in Syria?](#)” (in Arabic), Enab Baladi, 20 January 2025.

Muhamad Majd Hussein Deiry (US sanctioned)	محمد مجد حسين ديرى	“Majd Deiry” is a businessman who in Syria owned a black cement company and co-owned a travel company, al-Ta’ir, which was implicated in smuggling captagon and mercenaries. In April 2024 he was targeted by US sanctions under its Belarus program for alleged arms trafficking from that country, through an Iraq-based company, to Sudan. Two months earlier the FBI issued an arrest warrant against him.	Majd Deiry appeared in Syria in June 2025 when he reportedly represented a company, al-Arkhos, which facilitated the resumption of international flights to and from Damascus by Air Mediterranean, a Greek company. ³⁴⁹	High
Muhamad Nazer Jamal al-Din (EU, UK and US sanctioned)	محمد ناظر جمال الدين	Leading regime-linked businessman, controlling the APEX Development and Projects company involved in the Marota City project.	The companies he controls appear to be still operating in Syria. He was elected in June 2025 as a member of the Investment and Real Estate Development Committee of the Damascus Chamber of Commerce. ³⁵⁰	High
Nazira Farah Sarkis (EU and UK sanctioned, US delisted)	نظيرة فرح سرکيس	State minister for the Environment	Nazira Sarkis attended a medical seminar at the Faculty of Pharmacy in Aleppo as the Vice Dean of the Faculty. ³⁵¹	High
Najm al-Din Khreit (EU and UK sanctioned)	نجم الدين خريط	Minister of State, secretary-general of the Unified Syrian Communist Party.	Khreit lives in Syria and continues to lead the Unified Syrian Communist Party. ³⁵²	High

349- Maraya al-Sham, “[The First Air Mediterranean Flight Landed...](#)” (in Arabic), Facebook post, 30 June 2025; Bsiki et al., “[The Greek ‘Mediterranean Air’](#)” (in Arabic).

350- Damascus Chamber of Commerce, “[The Damascus Chamber of Commerce Forms an Investment and Real Estate Development Committee...](#)” (in Arabic), Facebook post, 2 June 2025.

351- Pharmacists’ Syndicate, Aleppo Branch, “[Attended by Dr Muhamad Wajih Jomaa, Director of Health in Aleppo...](#)” (in Arabic), Facebook post, 26 May 2025.

352- “[Statement Issued by the Meeting of the Political Bureau of the Syrian Unified Communist Party](#)” (in Arabic), Alnnour.com, 21 January 2025; Riyadi Nour El-Din, “[Najeem al-Din al-Khareet, Secretary-General of the Syrian Unified Communist Party, to ‘Taqqaddom’](#)” (in Arabic), Riad Nour El-Din Political and Union Blog, January 2025; Saad al-Yaacoubi, “[After Syria’s New Administration Dissolves Active Political Parties, a Moroccan Leftist Party Expresses Solidarity With the Syrian ‘Communist’ Party](#)” (in Arabic), Elaph.com, 1 February 2025.

Ra'if al-Quwatli (EU and UK sanctioned)	رئيف القوتلي	Business associate of Maher al-Assad and responsible for managing some of his business interests.	Reportedly fled to Iraq with Maher al-Assad. Quwatli then returned to Syria and had meetings with transitional government officials. ³⁵³	High
Rima al-Qadiri (EU sanctioned)	ريما القادري	Minister of Social Affairs (2015-20)	Reportedly implicated in missing children scandal, arrested by transitional government on 6 July 2025. ³⁵⁴	High
Samer al-Dibis (EU sanctioned)	سامر الدبيس	Prominent businessman linked to the Assad regime. Chairman of the Damascus Chamber of Industry and former MP. He partnered in business ventures with Muhamad Hamsho and Khaled Qaddour (both designated). He was known as a staunch defender of the Assad regime through his public statements and media appearances.	After fleeing to Beirut he returned to Damascus, where he was spotted in a restaurant. He negotiated with the transitional government about his assets, which were reportedly frozen, and in order to gain permission to resume business. His personal Facebook account is active and indicates that he lives in Damascus. ³⁵⁵	High
Talal Makhoulf (EU and US sanctioned)	طلال مخلوف	Commander of the Republican Guard, involved in and ordering violent repression of demonstrations, and arms smuggling.	He reportedly reached a settlement with the transitional government at the end of December 2024. ³⁵⁶	High

353- [“The Full Story of Assad’s Escape... and the Secret Unexpected Call to Mekdad”](#) (in Arabic), Al Arabiya, 19 December 2024; [“Return of Businessmen Linked to Assad: The Legal Economy Is the Priority”](#) (in Arabic), Al-Akhbar, 15 January 2025; [“Through Settlements and Mediation, the Syrian Administration Opens the Door for the Return of ‘Assad’s Whales’”](#) (in Arabic), Erem News, 13 January 2025; Hussein al-Khatib, [“Why Are the Frontmen of the Former Regime’s Economy Being Recycled in Syria?”](#) (in Arabic), Noon Post, 16 January 2025.

354- [“Syrian Interior Ministry Confirms Arrest of Two Former Ministers over Disappeared Children Case,”](#)

355- [“Funding War Crimes: Syrian Businessmen Who Kept Assad Going,”](#) p. 177–178; [“Speech of the Chairman of the Damascus and Rural Damascus Chamber of Industry – Samer al-Dibs \(within the Third Industrial Conference – Aleppo\)”](#) (in Arabic), 7MiX TV, 6 November 2018. See also [YouTube](#) (original publication by 7MiX TV); al-Mounes, [“How Assad’s Inner Circle Fled Syria After His Fall,”](#); [“Former Regime-affiliated Businessmen Seek to Save Their Businesses,”](#) Akhbar al-Asima, [“We received information indicating that the businessman Samer al-Dibs...”](#) (in Arabic), Facebook post, 31 January 2025.

356- [“Maxim Khalil Criticizes the Continued Presence of Corrupt ‘Money Whales’ in Damascus and Calls on the New Government for Transparency”](#) (in Arabic); Al-Nahar al-Arabi, [“Will the Street Appoint Assad’s Men to the Transitional Authority?”](#) (in Arabic), 9 February 2025; Sawt al-Asima, [“Talal Makhoulf Conducts a ‘Settlement’ and Hands Over His Weapons”](#) (in Arabic), Facebook post, 23 December 2024; Omar Zaqqouq, [“The Settlement With Major General Talal Makhoulf Sparks Controversy Among Syrians”](#) (in Arabic), Al Jazeera, 24 December 2024.

Tarif al-Akhras (EU sanctioned)	طاريف الأخرس	Founder of the Akhras Group (commodities, trading, processing, agro-businesses, and logistics) and former Chairman of the Homs Chamber of Commerce. He had close business relations with and is related to the ruling Assad family. Provided logistical support for the regime. He and his close relatives own several companies in the UAE and Lebanon.	Tarif al-Akhras was seen several times in Damascus after he wrote an open letter to President Ahmad al-Sharaa in January 2025, putting himself and all his factories at the disposal of the new authorities. He claimed that he had been a victim of the former regime's business policies. He reportedly reached a settlement that allowed him to retain control over his food processing factories, provided he would not hold any public position and keep a low media profile. Al-Akhras reportedly attended meetings of Homs Chamber of Commerce, although he no longer sits on its board of directors. ³⁵⁷	High
Wa'il al-Halqi (EU, UK, and US sanctioned)	وائل الحلقي	Prime Minister and Minister of Health	Al-Halqi was filmed speaking at an event at Qasyoun Private University. He is chairman of its board of trustees. ³⁵⁸	High
Wafiq Nasser (EU, UK, and US sanctioned)	وفيق ناصر	Head of As-Suwayda Regional Branch of Military Intelligence Directorate.	Rumored on social media to still reside at his apartment in Damascus. ³⁵⁹	High
Wassim al-Assad (EU, UK, and US sanctioned)	وسيم الأسد	Wasim Badia al-Assad is Bashar al-Assad's cousin and was allegedly involved in the production and trafficking of captagon. He is linked to key Lebanese drug lords.	Wassim al-Assad was arrested in Tel Kalakh, Homs, on 21 June 2025 when he tried to cross into Syria from Lebanon. Earlier he had been spotted in bars in Beirut. He was rumored to have been lured back to Syria by a journalist who pretended to be a government official offering a settlement. On 30 September 2025 he appeared in a video while being questioned by an investigative judge. ³⁶⁰	High

357- Al-Iqtisadi Syria, "[A Letter From Businessman Tarif al-Akhras to the Leader of the New Syrian Administration](#)" (in Arabic); Jableh and Coast News Network, "[Tarif al-Akhras Submits a Request to Settle His Status!!](#)" (in Arabic), Facebook post, 14 January 2025; "[Between Settlements and Exile, the Fate of Assad Regime Cronies](#)"; "[Government Reshuffles Chambers of Commerce](#)."

358- Nicola Alz, "[Interrupting Former Prime Minister Wael al-Halqi's Speech With Chants of 'Kou' Kou'](#)" (in Arabic), Facebook post with video, 2:06, 17 January 2025.

359- Omar Rahmon, "[The New Syrian Leadership Is Not...](#)" (in Arabic), X post, 20 December 2024.

360- Bassam al-Kuwatli, "[I admit that part of me is pleased about what is happening to Wassim al-Assad...](#)" (in Arabic), Facebook post, 22 June 2025;; Tariq Abu Zainab, "[Wassim al-Assad and Nouh: Symbols of the Corruption and Narcotics Alliance](#)" (in Arabic), Nidaa al-Watan, 6 January 2025; Suriya al-Jadida, "[Watch and Enjoy the Interrogation of Wasim al-Assad!](#)" (in Arabic), Facebook post with video, 2:45, 30 September 2025.

Wassim al-Qattan (EU and UK sanctioned, delisted by the US)	وسيم القطان	Prominent businessman linked to the regime and Rami Makhoul. Former president of the Rural Damascus Chamber of Commerce and former secretary general of the Federation of Syria Chambers of Commerce. Accused of imposing taxes on goods smuggled into besieged Eastern Ghouta. He sponsored regime programs for “martyrs” and wounded of the Syrian army.	Reportedly still in Damascus, although he denied this. A mall operated by al-Qattan is still open for business (Massa Plaza Mall, see Appendix 2). In February 2025 he denied having reached a settlement with the transitional government. Al-Qattan is believed to regularly travel to Lebanon and France. ³⁶¹	Medium
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United Arab Emirates (UAE)

Name	Name in Arabic	Short bio	Whereabouts	Level of confidence
Ahmad Barqawi (EU sanctioned, UK and US delisted)	أحمد برقاوي	General manager of Pangates International company and al-Karim Group, both designated for facilitating fuel supplies to the regime, including for military purposes.	Manages Wael Abdul Karim’s company in Jabal Ali, Dubai. Owns significant real estate properties in Dubai. ³⁶²	High

361- [“Council Implementing Regulation \(EU\) 2025/1094 of 27 May 2025 Implementing Regulation \(EU\) No. 36/2012 Concerning Restrictive Measures in View of the Situation in Syria,”](#) EUR-Lex, 28 May 2025; Ayman al-Dasouqi, [“Emerging Economic Elites in Syria: Al-Qattan and the Al-Qatirji Brothers”](#) (in Arabic), Omran Center for Strategic Studies, 22 February 2019; [“Assad’s Businessmen: Wassim Quattan,”](#) ProJustice.org, accessed 1 November 2025; [“Former Regime-affiliated Businessmen Seek to Save Their Businesses”](#); Interview with a former regime insider, July 2025.

362- [“Network of Businessmen for Financing the Syrian Regime and Evading International Sanctions”](#) (in Arabic), ProJustice.org, 30 January 2020; [“Sandcastles: Tracing Sanctions Evasion Through Dubai’s Luxury Real Estate Market,”](#) C4ADS, 12 June 2018.

Ahmad Sabir Muhammad Hamsho (US sanctioned)	أحمد صابر حمشو	Businessman closely linked to the regime. Brother of leading regime businessman Muhamad Hamsho.	Per his own social media, he lives a luxurious life in the UAE, where he manages several companies and participates in equestrian competitions. ³⁶³	High
Ahmad Khalil Khalil (EU, UK, and US sanctioned)	أحمد خليل خليل	Close associate of Yassar Ibrahim, a key regime businessman. Alleged to have been the real owner of Al-Fadhil Exchange Company (also designated). Co-owner of Sanad Protection and Security Services, a designated Syrian private security company established in 2017 and supervised by the Wagner Group. Sanad was active in the recruitment of Syrian mercenaries to Libya and Ukraine.	Khalil was reportedly on an 8 December 2024 flight from Hmeimim airbase (Syria) to the UAE, carrying cash with him belonging to Al-Burj Investments, a company 50 percent owned by Yassar Ibrahim. ³⁶⁴	High
Amer Foz (EU, UK, and US sanctioned)	عامر فوز	Prominent regime-linked businessman; brother of Samer Foz.	Residing in the UAE, according to a Facebook page that appears to be his. Amer Foz runs several companies and owns several high-end properties in Dubai. In 2022 he told an EU court that he no longer resides in Syria but in Dubai. ³⁶⁵	High

363- Ahmad Hamcho, [Instagram profile page](#), accessed 1 November 2025

364- Dalatey et al., “[Operation Assad: The Air Mission to Smuggle the Syrian Despot’s Valuables](#).”

365- Amer Foz, [Profile Page](#), Facebook, accessed 1 November 2025; Amer Foz, Profile Page, LinkedIn, accessed 1 November 2025; Bassiki et al., “[Dubai Unlocked: Ten Individuals Within Assad’s Close Circle Hide 50 Million Dollars in Dubai Estates](#)”; “[Judgment of the General Court \(Fourth Chamber\), Case T-296/20, Amer Foz v. Council of the European Union](#),” CURIA (Court of Justice of the European Union), 18 May 2022.

Ammar Saati (US sanctioned)	عمار ساعاتي	Member of Ba'ath Party command, headed the party's Youth Office and led the National Union of Syrian students. Member of Parliament. Widower of Luna al-Shibl, who was a close advisor to President Bashar al-Assad.	Likely residing in Dubai. On 21 July 2025, Saati reportedly shared a live video on his personal Facebook account while driving down the streets of Damascus after midnight next to the Dama Rose hotel but without showing his face. The video, if confirmed to be authentic, seems to suggest that Ammar Saati is conducting negotiations with the transitional government and for this is allowed to visit Syria. ³⁶⁶	Medium
Ammar Medhat Sherif (EU, UK, and US sanctioned)	عمار شريف	Prominent regime-linked businessman, partnered with Rami Makhlouf and his relatives.	Reportedly owns an apartment in the Cayan Tower in Dubai's Marina area. ³⁶⁷	Medium
Amr Muhammad Hamsho (EU and US sanctioned)	عمرو محمد حمشو	Son of leading regime-linked businessman Muhamad Hamsho. Co-owner of several family companies in Syria.	His personal social media pages show him living a life of luxury in the UAE while taking part in equestrian competitions. ³⁶⁸	High
Bishr Riyadh Yazigi (EU and UK sanctioned)	بشر رياض يازجي	Advisor to President Bashar al-Assad, MP	Yazigi reportedly met with Saqr Rustom in Dubai to discuss plans to form anti-government militias in Syria. ³⁶⁹	Medium
Bushra al-Assad (EU, UK, and US sanctioned)	بشرى الأسد	Bashar al-Assad's sister. Widow to security chief and deputy Defence Minister Asef Shawqat, who was killed in an explosion in Damascus in July 2012.	Media reports claim that immediately following the fall of the regime, Bushra al-Assad and her son Basel were seen at the Beirut airport. They have lived in Dubai since 2012. ³⁷⁰	High

366- Hossam Jazmati, "[The live broadcast posted by Ammar Saati from Damascus at around one o'clock. We return to the question: how is this man in Damascus?](#)" (in Arabic), Facebook post with video, 0:56, 20 July 2025; Interview with a former regime insider, July 2025.

367- Bassiki et al., "[Dubai Unlocked: Ten Individuals Within Assad's Close Circle Hide 50 Million Dollars in Dubai Estates.](#)"

368- Amr Hamsho, [Profile Page](#), Facebook, accessed 1 November 2025; Amre Hamcho, [Profile Page](#), Instagram, accessed 1 November 2025.

369- Interview with a former regime insider, July 2025.

370- "[Bashar Hafiz al-Assad and His Son Departed Through Beirut Airport](#)" (in Arabic), Nidaa al-Watan, 12 December 2024; Louay Faour, "[Syrians Worried Fleeing Regime Officials Will Evade Justice, as Lebanon Denies Any Entered the Country](#)," The New Arab, 12 December 2024; Abdulrahman Al-Rashed, "[Visit of Assad's Sister to Dubai](#)," Arab News, 26 September 2012.

Ali Abu Khodr (Ali Taher / Khodr Bin Ali / Khodr Ali Taher) (EU, UK, and US sanctioned)	خضر علي طاهر	Key regime-linked businessman, accused of involvement in smuggling and money laundering, and active in numerous sectors including private security companies, advertising, and tourism.	Khodr Ali Taher reportedly has been staying in the UAE since he fell out with the Assad regime in early 2024. However, he is believed to still visit Syria. Emma Tel, one of his main companies, was reportedly shut down. In January 2025 security forces clashed with Khodr Ali Taher's aides in Latakia when trying to seize one of his warehouses. They found a secret prison and released three men, including a merchant's son from Aleppo.³⁷¹	Medium
Firas al-Akhras (EU and US sanctioned)	فiras الأخرس	Leading regime-linked businessman partnering with other influential businessmen Muhannad al-Dabbagh and Naji al-Otri, brother of Asma al-Assad.	While some reports say that Firas al-Akhras resides in the UK (he has British citizenship), he owns and runs businesses in Dubai and is considered close to the UAE government. He is therefore more likely to spend most of his time in the UAE. Since the fall of the regime, Firas al-Akhras has visited Syria a number of times.³⁷²	High
Manal al-Assad / Jad'an (EU, UK, and US sanctioned)	منال الأسد جدعان	Wife of Maher al-Assad	According to Lebanese authorities Manal al-Assad went with her son through Beirut airport to an undisclosed destination. In January 2025, her sister, Majd Jad'an, disclosed that Manal had divorced Maher and now lives in the UAE.³⁷³	High

371- [“Security Source Reveals Why Asma al-Assad Is Angry With Businessman Abu Ali Khodr”](#) (in Arabic), Syria TV, 23 March 2024; [“To Relinquish His Wealth Outside Syria... ‘Abu Ali Khodr’ Placed Under House Arrest”](#) (in Arabic), Syria TV, 14 March 2024; [“Former Regime-affiliated Businessmen Seek to Save Their Businesses”](#); Interview with a former regime insider, July 2025.

372- [“Firas Fawaz al-Akhras”](#) (in Arabic), Manhom.com, accessed 1 November 2025; Dhia Qaddour, [“Al-Akhras and Attri Instead of Makhoul: Emirati-Iranian Competition for Influence in Syria”](#) (in Arabic), Syria TV, 20 August 2024.

373- [“Special Coverage—Syria: Rebirth of a Republic: How Assad’s Inner Circle Fled Syria After His Fall,”](#) Arab News, 21 December 2024; Al-Quds al-Arabi, [“Maha al-Assad’s Wife’s Sister Reveals: Manal Jadaan Has Separated From Him and Is Residing in the UAE \(Video\)”](#) (in Arabic), 12 January 2025.

Mudar Rifaat al-Assad (EU sanctioned)	مضر الأسد	One of Rifaat al-Assad's sons, he remained in Latakia until the fall of the regime. He owns or controls several shipping and transport companies and is suspected of involvement in the captagon trade.	Unsuccessfully challenging his designation under EU sanctions, Mudar al-Assad earlier told the European Court of Justice that he lived between Damascus and Dubai on a residence permit expiring in October 2024. This permit may have been extended. Yet he also has been reported to reside in Jabal Mohsen, Tripoli, Lebanon. As he carries a diplomatic passport from Antigua and Bermuda, he may reside in either location and/or travel easily. In April 2025 Mudar al-Assad issued a statement calling for "unity" and an amnesty for "mistakes of the past," but without revealing his whereabouts. ³⁷⁴	Medium
Muhamad al-Muflih (EU and UK sanctioned)	محمد المفلح	Brigadier-general, head of Military Intelligence Directorate branch in Hama and then in Aleppo.	After deserting in 2013, Muhamad al-Muflih fled to Türkiye and then to Dubai, where he now resides. Reports about him having been killed when he fled Syria are inaccurate. ³⁷⁵	Medium
Muhamad Dib Zeitoun (EU, UK, and US sanctioned)	محمد ديب زيتون	Key intelligence official. Head of General Security Directorate, Director of the National Security Bureau, and Former Head of the General Security Directorate.	An unconfirmed report claims he resides in Moscow, Russia. Yet a reliable source said he is in Dubai. ³⁷⁶	Medium
Nasser al-Ali (EU, UK, and US sanctioned)	ناصر العلي	Head of the Political Security Directorate since July 2019; tribal leader.	Fled to Beirut and then moved on to Saudi Arabia, where he reportedly obtained a visa and residency for the UAE. ³⁷⁷	Medium

374- Al Jazeera English, "[Diplomats for Sale | Al Jazeera Investigations](#)," YouTube video, 53:02, 26 November 2019; Lubnan News Official, "[Information on the Presence of Mudar Rifaat al-Assad Hiding in the Jabal Mohsen Area Among the Alawite Community](#)" (in Arabic), YouTube video, 2:21, 18 December 2024; "[Arrêt du Tribunal \(Neuvième Chambre\), Affaire T-420/23, Mudar Al-Assad v. Council of the European Union](#)" (in French), EUR-Lex, 11 December 2024; "[Mudar al-Assad: For the Sake of Syria: People Before Stone](#)" (in Arabic), Rai al-Youm, 27 April 2025.

375- Interview with a former regime-insider, July 2025; "[Muhamad al-Muflih](#)" (in Arabic), Syrian Memory Institution, accessed 1 November 2025; "[Who Is Major General Muhamad Muflih and Where Is He Now... Learn the Reasons Behind His Disappearance](#)" (in Arabic), Al-Kawthar, 13 February 2018; al-Assad aw la Ahad (community page), "[The Hawker of Aleppo: Brigadier-General Defector Muhamad al-Muflih](#)" (in Arabic), Facebook Notes post, 14 March 2021.

376- Dilovan Dara, "[Brewin Ibrahim to Rudaw After the Maher Video Spread: The Assad Family Forgot Syria](#)" (in Arabic), Rudaw, 19 June 2025.

377- Interview with one of al-Ali's relatives, May 2025.

Nasser al-Ali (EU, UK, and US sanctioned)	رامي مخلوف	Leading businessman affiliated with the Assad regime, active in multiple sectors and enjoying numerous trade monopolies, key financier of pro-regime militias. Once an influential member of the Makhoul family and a cousin of President Bashar Al-Assad. He lost influence and control over many of his assets in Syria when he fell out with the regime in 2020.	When the Assad regime fell, Rami Makhoul reportedly moved, with relatives, to Lebanon. Gunmen fired shots at the convoy en route, killing Rami's brother Ihab. Subsequently, Rami went to Dubai and posted several messages on social media, positioning himself as defender of the Alawite community, seeking engagement with the transitional government, and at the same time calling for armed resistance against it. He claimed there had been negotiations between him and the transitional government, but with no agreement reached. Rami owns several high-end properties in Dubai. ³⁷⁸	High
Razan Uthman (EU and UK sanctioned)	رزان عثمان	Wife of Rami Makhoul	Reportedly fled to Lebanon and now resides in the UAE. ³⁷⁹	Medium

378- [“Top Security Officials Fled Syria Shortly Before Assad’s Fall”](#); [“Syrian Economic Players React to Regime Collapse”](#) (in Arabic), The Syria Report (subscriber-only content), 11 December 2024; [“Who Are the Most Prominent Officials Close to Former Syrian President Bashar al-Assad, and Where Are They Now?”](#) (in Arabic), CNBC Arabia, 22 December 2024; Rami Makhoul, [“Peace and mercy of God be upon you. O God, have mercy on these martyrs...”](#) (in Arabic), Facebook post, 9 March 2025; al-Marsad al-Suri (Syrian Observatory), [“...Today I will reveal to you, with complete honesty and objectivity, the reason for the attacks...”](#) (in Arabic), Facebook post, 28 May 2025; [“Between Settlements and Exile, the Fate of Assad Regime Cronies”](#); [“Government Reshuffles Chambers of Commerce.”](#); Bassiki et al., [“Dubai Unlocked: Ten Individuals Within Assad’s Close Circle Hide 50 Million Dollars in Dubai Estates.”](#)

379- Saeed Elias, [“Rami Makhoul’s Family Departs to the UAE Through the VIP Lounge at Beirut Airport”](#) (in Arabic), Al-Quds al-Arabi, 10 October 2020.

Samer Foz (EU, UK, and US sanctioned)	سامر فوز	Leading businessman with interests and stakes in multiple sectors, including high-end real estate development, banking, hotels, sugar production, pharmaceuticals, and the trade in wheat and oil. He was convicted in 2013 by a Turkish court for murdering an Egyptian-Ukrainian businessman. Very close to Bashar and Asma al-Assad, and at one point reached a level of influence earning him the nickname “the new Rami Makhlouf.”	Samer Foz has been residing in Dubai. He was seen in Damascus at least until January 2025. He is believed to have been negotiating a settlement with the transitional government through his partner Khaldoun al-Zu’bi. In April Foz reportedly left Syria when these negotiations broke down. However, Reuters reported in July that a deal was reached wherein Foz handed over 80 percent of his assets (presumably, only those assets in Syria) valued at USD 800 800 million–1 billion, including a large sugar refinery. Even so, Foz is believed to remain in Dubai where he owns several high-end properties, relying on al-Zu’bi to represent his interests in Syria. He also holds Turkish and Lebanese citizenship.³⁸⁰	Medium
Yassar Ibrahim (EU, UK, and US sanctioned)	يسار ابراهيم	Perhaps the most influential businessman since 2000, closely linked to and fronting for Bashar and Asma al-Assad. He oversaw a vast network of companies dubbed “the Group.”	Yassar Ibrahim was on the same plane to Moscow with Bashar al-Assad. He helped to smuggle cash and valuables out of Syria to the UAE. He is believed to have arrived in Abu Dhabi on 11 December 2024.³⁸¹	High

380- Maher al-Akl, “[After Several Years... A Video Proves the Involvement of Samer Foz’s Associates in the Killing of an Egyptian Businessman in Turkey](#)” (in Arabic), Orient Net, 28 August 2021; “[Between Settlements and Exile, the Fate of Assad Regime Cronies](#)”; Azhari, “[Exclusive: Syria’s New Leaders Zero In on Assad’s Business Barons](#)”; “[Samer Foz Flees Syria After Failed Settlement with the State](#),” The Syrian Observer, 10 April 2025.; Azhari and Dalatey, “[Syria Is Secretly Reshaping Its Economy. The President’s Brother Is in Charge.](#)”; Bassiki et al., “[Dubai Unlocked: 10 Individuals Within Assad’s Close Circle Hide 50 Million Dollars in Dubai Estates](#)”; “[Why Are the Frontmen of the Former Regime’s Economy Being Recycled in Syria?](#)” (in Arabic); Interview with middleman liaising between businessmen and the Economic Committee, June 2025.

381- Dalatey et al., “[Operation Assad: The Air Mission to Smuggle the Syrian Despot’s Valuables.](#)”; Azhari and Dalatey, “[Syria Is Secretly Reshaping Its Economy. The President’s Brother Is in Charge.](#)”; Interview with a relative of Samer Foz, July 2025.

Yassin Dhahi (EU, UK, and US sanctioned)	ياسين ضاحي	Brigadier General, senior officer within the Military Intelligence Directorate, former head of Military Intelligence Branch 235 in Damascus and Military Intelligence in Homs, chief of Palestine Branch from 2014 to 2016.	Reportedly residing in the UAE. Yet other sources claim he is in Lebanon. ³⁸²	Low
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Oman

Name		Whereabouts	Whereabouts	Level of confidence
Abd Al-Fatah Qudsiya (EU, UK, and US sanctioned)	عبد الفتاح قدسية	Key regime intelligence chief. Major General in the Syrian Armed Forces in post after May 2011. Deputy Director of the National Security Bureau of the Ba'ath Party. Former Head of Syrian Military Intelligence.	His daughter, Fatouh Qudsiya, held a senior position at the Syrian embassy in Muscat and may have facilitated the arrival and residence of her father and other family members. Fatouh Qudsiya herself was reportedly granted asylum in Oman. ³⁸³	Medium
Buthaina Shaaban (EU, UK, and US sanctioned)	بثينة شعبان	Political and Media Advisor to former President Bashar al-Assad.	According to Lebanese Interior Minister Bassam Mawlawi, Buthaina Shaaban entered Lebanon legally and then flew out of Beirut on the night of 7-8 December 2024. She then travelled to Abu Dhabi (where she was photographed) and eventually settled in Oman. Even before the fall of the regime, Shaaban was a welcome guest in Oman. ³⁸⁴	High

382- Musab al-Mujbil, [“Tracking Map’: Where Did the Senior Officers of Bashar al-Assad Involved in Syrian Bloodshed Flee To?”](#) (in Arabic), Al-Estiklal, 21 December 2024.

383- Zaman al-Wasl, [“Sons of War Criminals Run the ‘Free Syria’ Embassy in Muscat”](#) (in Arabic), Facebook post, 5 April 2025.

384- [“Butcher of Hama’: Assad’s Uncle Rifaat Fled to Dubai, Lebanese Officials Say”](#); [“How Assad’s Inner Circle Fled Syria After His Fall”](#); Omar Madaniya, [“The adviser of the fugitive Bashar al-Assad, ‘Bouthaina Shaaban,’ is at Dubai Airport...”](#) (in Arabic), X post (formerly Twitter), 15 December 2024; [“Shaaban Discusses With Omani Official the Latest Developments in the Region,”](#) Syrian Arab News Agency (SANA), 24 September 2024; Interview with a former regime insider, July 2025.

Duraïd Durgham (EU and UK sanctioned, US delisted)	درید درغام	Former Central Bank governor	Stayed in Damascus at least until March 2025 when he moved to Oman, exploring job opportunities. In February 2025 he gave an interview to a Syrian online economic magazine, claiming that he had not done anything wrong. ³⁸⁵	High
Fuad Ahmad Hamuda (EU, UK, and US sanctioned)	فؤاد حمودة	Special forces commander, commander of military operations in Idlib and Jisr al-Shughur 2012–2011. Ordered troops to use indiscriminate violence against civilians. Head of the military security committee in Homs 2014–2015.	While some reports claim that in January 2025 Fuad Hamuda was staying in his home village of Qala'i (Jableh); it is more likely that he moved to Oman or did so soon after. His son, Basel Hamuda, held a senior staff position at the Syrian embassy in Muscat. An anonymous source at the embassy said Basel renewed the passport of a member of the Hamuda family arriving in Oman. ³⁸⁶	Medium
Humam al-Jaza'iri (EU and UK sanctioned)	همام الجزائري	Minister of Economy and Foreign Trade. Member of the board of directors and audit committee of Syriatel. Board member of Cham Holding.	Al-Jaza'iri has lived in Muscat, Oman, since July 2022, where he works as a "business development specialist." ³⁸⁷	High
Salam Muhamad al-Saffaf (EU sanctioned)	سلام محمد السفاف	Minister for Administrative Development	Al-Saffaf resides in Oman, where she is a visiting professor at the Modern College of Business and Science. ³⁸⁸	High

385- Whatsapp correspondence with Duraïd Durgham, June 2025; Syrian Industry News, "[Frozen assets, the exchange rate, and other important questions...](#)" (in Arabic), Facebook post, 14 February 2025.

386 -Anonymous participant, "[Jableh will keep causing problems until they 'get' General Fouad Hammouda's wife](#)" (in Arabic), Facebook post (public group: Tartous Now), 14 January 2025; Zaman al-Wasl, "[Sons of War Criminals Run the 'Free Syria' Embassy in Muscat](#)" (in Arabic).

387- Humam A., [Profile Page](#), LinkedIn, accessed 1 November 2025.

388- "[Salam Mohammed Saffaf](#)" (in Arabic), Profile Page, Al-Roya, accessed 1 November 2025

Türkiye

Name		Short bio	Whereabouts	Level of confidence
Amer Taysir Khiti (EU, UK, and US sanctioned)	عمر تيسير خيتي	Leading regime-linked businessman, accused of involvement in the illicit captagon trade in partnership with Maher al-Assad.	Directly after the fall of the regime, Amer Taysir Khiti moved to Istanbul, where he owns real estate in several residential and commercial projects. A report that he was arrested in Baghdad in March 2025 is likely inaccurate. ³⁸⁹	High
Fadel Balwi (US sanctioned)	فاضل بلوي	Owner of Al-Fadel Exchange Company (designated).	After his company was liquidated in June 2025, Fadel Balwi reportedly left for Türkiye. ³⁹⁰	Medium

Jordan

Name		Short bio	Whereabouts	Level of confidence
Hussam Luqa (EU, UK, and US sanctioned)	حسام لوقا	Head of Political Security Directorate	In January and February 2025, security forces were reportedly searching for Hussam Luqa in and around Homs with the intent to arrest him. There were no credible reports of him having been captured. He likely escaped during the violence on the coast in March 2025. Some reports claim he resides in Moscow, but a reliable source said he is in Jordan. ³⁹¹	Medium

389- “[Assad’s Businessmen: Amer Tayseer Khiti](#)” (in Arabic), ProJustice.org, accessed 1 November 2025 — On 15 December 2024, Khiti posted a selfie with his son standing on Istiklal Caddesi in Istanbul. — mrtysyrk, “[[photo of two men standing by a river with a bridge in the background](#)],” Instagram post, 3 December 2024. — For his reported arrest in Baghdad see: Haydar, “[The security forces have arrested \(Amer Khiti Tayseer\)...](#)” (in Arabic), X post (formerly Twitter), 17 March 2025.

390- “[Syria’s Financial Revamp Begins to Take Shape](#),” The Syria Report (subscriber-only content), 17 June 2025; “[Exclusive – Revealing the Secrets of al-Fadel Company, Hezbollah’s New Financial Arm Abroad](#)” (in Arabic), Erem News, 14 November 2024.

391- “[Intensive Security Campaign in Homs to Pursue General Hussam Louka](#)” (in Arabic), Erem News, 14 January 2025; “[Preparing to Arrest the Director of General Intelligence... ‘General Security’ Forces Ready a Security Campaign in Homs](#)” (in Arabic), Syrian Observatory for Human Rights, 14 January 2025; “[General Security Launches a Security Campaign Targeting Neighborhoods in Deir Ezzor City](#)” (in Arabic), Syrian Observatory for Human Rights, 3 February 2025; Dara, “[Brewin Ibrahim to Rudaw After the Maher Video Spread](#)”; Solomon et al., “[The Vanishing Act: How Assad’s Top Henchmen Fled Syria, and Justice](#)”; Interview with a former regime insider, July 2025.

Lebanon

Name		Short bio	Whereabouts	Level of confidence
Abbas Qatarji (US sanctioned)	عباس قاطرجي	Son of leading regime businessman Muhamad Baraa al-Qatarji, and associated with the Al-Qatarji Company.	The family of Muhamad Baraa Qatarji (and his two brothers, Hussam and Muhamad Agha) entered Lebanon in a convoy of cars and are reportedly residing in houses located behind the Four Seasons Hotel in Beirut, under the direct protection of retired Lebanese Major General Abbas Ibrahim's bodyguards. ³⁹²	High
Adnan al-Ali (US delisted)	عدنان العلي	Businessman, advisor to Lebanon-based Abar Petroleum company (US delisted) and a probable agent of the Syrian General Intelligence Directorate. Accused of involvement in an international procurement network that secured deliveries of fuel, oil, and gas to the regime, including for military use.	Due to his extensive Lebanese contacts and partnerships, Adnan al-Ali is likely in Lebanon.	Medium
Amjad Youssef (EU and US sanctioned)	أمجد يوسف	Officer in Syrian Military Intelligence, accused of having been involved in the Tadamon massacre in April 2013.	While lower-ranking officers accused of involvement in the Tadamon massacre were arrested in Syria, Amjad Youssef is believed to have fled to and reside in Lebanon. He is believed to have undergone plastic surgery so as not to be recognized. ³⁹³	Medium
Anan Wassouf (US sanctioned)	عنان وسوف	Wife of Amjad Youssef (designated)	Initially staying in Tartous, she reportedly moved to Lebanon and is now living in Hermel under the protection of Hezbollah. ³⁹⁴	Medium

392- Maher Sharaf al-Din, “[Exclusive and Very Important... and Constitutes a Notification to the Lebanese State to Act](#)” (in Arabic), Facebook post, 13 December 2024.

393- Interview with a well-informed former regime official in Beirut, February 2025 and July 2025.

394- Interview with a former regime insider, February and July 2025.

Bassam Hassan (EU, UK, and US sanctioned)	بسام حسن	Bassam al-Hassan was the Director of the Security and Military Office at the Presidential Palace and served as the Head of the Protection Unit for President Bashar al-Assad. He also oversaw security and logistical matters for scientific research centers involved in the production of chemical weapons, and served as Chief of Staff for the National Defence Force (NDF) militias.	Bassam Hassan and his relatives fled to Homs, then to Lebanon, and moved to Iran. Yet in April 2025 he traveled back to Beirut to meet with US officials, negotiating his fate in exchange for providing information on Austin Tice, a US journalist who disappeared in Syria in 2012. In October 2025 CNN found Hassan living in an apartment in Beirut. He has recently been diagnosed with cancer. ³⁹⁵	High
Fadi Nabih Nasser (US delisted)	فادي نبيه ناصر	Lebanon-based businessman accused of facilitating fuel shipments on behalf of the Syrian regime in breach of sanctions.	Fadi Nabih Nassar leads a company named Nasco Polymers & Chemicals, headquartered at the UNESCO Centre in Verdun, Beirut. The company also has a branch in Bulgaria. ³⁹⁶	High
Firas al-Hamid (EU, UK, and US sanctioned)	فراس الحامد	Former head of General Intelligence Directorate (Homs branch) and former head of State Security branch in Latakia governorate. Governor of Tartous.	Firas al-Hamid was reportedly on 3 December 2024 at the Arida border crossing with Lebanon and is likely to have moved to Lebanon. ³⁹⁷	Low

395- Adam Goldman et al., “[Syrian General Questioned in Case of Austin Tice, Missing American Journalist](#),” The New York Times (subscriber-only content), 15 June 2025; Solomon et al., “[The Vanishing Act: How Assad’s Top Henchmen Fled Syria, and Justice](#)”; Interview with a former regime insider, February and July 2025; Ward and El Sirgany, “[The Road That Led, 13 Years Later, to Hearing: ‘Austin Is Dead’](#)”

396- “[Nasco Polymers & Chemicals Co. S.A.L.](#),” LookChem.com, accessed 1 November 2025.

397- “[Partial Resumption of Operations at the al-Arida Border Crossing in Tartous – Video](#)” (in Arabic), Syrian Arab News Agency (SANA), 3 December 2024; Interview with a former regime insider, July 2025.

Ghada Adib Mhanna (EU sanctioned)	غادة مهنا	Widow of Muhamad Makhoul, mother of Rami Makhoul	Immediately after the fall of the regime in December 2024, Ghada Mhanna was reportedly staying at the Phoenicia Hotel in Beirut. However, she may have moved on to the UAE to join her son Rami Makhoul. ³⁹⁸	Low
Ghaith Dala (EU and US sanctioned)	غيث دلة	Formerly a senior officer with the Political Security Directorate and brigadier-general with the Fourth Division. Reportedly joined the leadership of the “Military Council to Liberate Syria,” which conducted military operations in March 2025 against the transitional government.	On 6 March 2025 Ghaith Dala signed a public statement made by the “Military Council to Liberate Syria” conducting military operations on the west coast of Syria. Earlier reports claimed he was in al-Rutba (Iraq). Throughout he is most likely to have guided operations from abroad and currently resides in Lebanon. ³⁹⁹	Medium
Hafez Makhoul (EU, UK, and US sanctioned)	حافظ مخلوف	Former Colonel and Head of Unit in General Intelligence Directorate, Damascus Branch. First cousin of President Bashar al-Assad.	According to Rami Abdul Rahman, director of the Syrian Observatory of Human Rights, Hafez Makhoul resides in Dbayeh, Lebanon. However, he may also be in (or travel to and from) Russia, where he owns several high-value properties. ⁴⁰⁰	Low
Hassan Muhamad Daqqu (EU, UK and US sanctioned)	حسن دقو	Accused of being a leading figure in the illicit captagon trade. Has links with the Fourth Division.	Hassan Daqqu, having both Syrian and Lebanese citizenship, resides in Lebanon. He successfully ran as a candidate in Lebanon’s municipal elections held in May 2025 for the village of Tufayl (Baalbek-Hermel), and has been spotted in security convoys. ⁴⁰¹	High

398- [“Hezbollah Said to Have Helped Assad Officials Flee to Lebanon, Sparking Furor in Beirut”](#)

399- “Khalaf al-Kulays News, [“Urgent: Arrival of a Group of Houthi Militias to the al-Marsanat Camp in Rutba in an Attempt to Send Them to Syria”](#) (in Arabic), X post (formerly Twitter), 3 March 2025; Ramez Homs, [“Former Commander of the Ghaith Forces of the Fourth Division, Brigadier General Ghaith Dalla...”](#) (in Arabic), X post, 6 March 2025; Solomon et al., [“The Vanishing Act: How Assad’s Top Henchmen Fled Syria, and Justice”](#); Interview with a former regime insider, July 2025.

400- Al-Marsad al-Suri (Syrian Observatory for Human Rights), [“Director of the Syrian Observatory: We hope the Syrian government will take advantage of the sanctions-suspension issue...”](#) (in Arabic), Facebook post with video, 25:46, 30 May 2025; Global Witness, [“Assad’s Money Men in Moscow,”](#); Interview with former regime insider, July 2025.

401- Anba’ Tfail, [“In my name, I, Alaa Mahmoud al-Shoum, and on behalf of my family...”](#) (in Arabic), Facebook post, 18 May 2025; Nadine Barakat, [“Hassan Daqqu, the biggest drug trafficker, was moving around in Ministry of Interior vehicles...”](#) (in Arabic), X post (formerly Twitter), 28 February 2025.

Hussam Muhammad Qatarji (EU, UK, and US sanctioned)	حسام قاطرجي	Very influential regime-linked businessman, MP, active in multiple sectors including grain and oil, in addition to investments in real estate development.	Hussam Qatarji resides in Beirut, from which he continues to manage a number of his companies; others were seized or taken over by the Syrian transitional government. His son Ahmad Agha Hussam al-Qaterji also resides in Beirut, per his own social media. Both regularly travel to Dubai. ⁴⁰²	High
Kifah Melhem (EU, UK, and US sanctioned)	كفاح ملحم	Key regime security figure, head of Military Intelligence Directorate	Kifah Melhem is believed to have moved to Lebanon, where he stays under Hezbollah protection. However, a New York Times investigation located him in Russia. ⁴⁰³	Medium
Lu'ai al-Ali (EU and UK sanctioned)	لؤي العلي	Head of Syrian Military Intelligence Directorate, Daraa Branch.	Lu'ai al-Ali is believed to initially have remained in Daraa, southern Syria. In January 2025 there were conflicting reports claiming and denying that he had been arrested. He subsequently moved to Beirut. ⁴⁰⁴	Medium
Muhamad Ibrahim Khaddour (EU and UK sanctioned)	محمد ابراهيم خضور	Commander of the 106th Brigade, Presidential Guard. Responsible for repression of peaceful protestors in Duma and Homs.	After initially staying in Homs, Khaddour is believed to have moved to Lebanon. ⁴⁰⁵	Medium
Muhamad Khalid al-Rahmoun (EU, UK and US sanctioned)	محمد خالد رحمون	Minister of the Interior	He is believed to reside in Beirut and to travel regularly to Dubai. ⁴⁰⁶	Medium
Muhamad Riyyad Shalish (EU and UK sanctioned)	محمد رياض شاليش	Son of regime-linked Riyyad Shalish; involved in the illicit narcotics trade, especially captagon.	Muhamad Riyyad Shalish fled to Lebanon, where he is reportedly staying with family members under Hezbollah's protection in a hotel in Beirut. He is believed to regularly travel to Dubai. ⁴⁰⁷	Medium

402- Syria TV, "[Syrian TV obtains an audio leak of Abdel Nasser Absi, head of the office of 'General Ali Mamlouk,' adviser to the ousted regime president Bashar al-Assad for national security](#)" (in Arabic), Facebook post with video, 1:07, 15 December 2024; "[Between Settlements and Exile, the Fate of Assad Regime Cronies](#)"; Ahmad Agha Qaterji, [Profile Page](#), Facebook, accessed 1 November 2025; Interview with a former regime insider, July 2025.

403- Karin al-Qassis, "[Exclusive: Kifah Melhem... One of Assad's Most Prominent Men Is Present in Lebanon](#)" (in Arabic), Nidaa al-Watan, 7 January 2025; "[The Missing Enforcers of the Assad Regime](#)," The New York Times (subscriber-only content), 15 October 2025; Interview with a former regime insider, July 2025.

404- Interview with a former regime insider, February and July 2025; Omar Alhariri, "[The news of the arrest of the other criminal in Daraa, Louay al-Ali, is false...](#)" (in Arabic), X post (formerly Twitter), 31 January 2025.

405- Interview with a former regime insider, February and July 2025.

406- Interview with a former regime insider, February and July 2025.

407- "[Top Security Officials Fled Syria Shortly Before Assad's Fall](#)"; Interview with a former regime insider, July 2025.

Russia

Name		Short bio	Whereabouts	Level of confidence
Abdel Karim Mahmoud Ibrahim (EU and UK sanctioned)	عبد الكريم محمود إبراهيم	Chief of Staff of the Armed Forces	Reportedly fled Syria on a Cham Wings plane from Damascus to Benghazi on 8 December 2024. He is likely to have then moved on to Russia. ⁴⁰⁸	Medium
Ali Ayyoub	علي عبد الله أيوب	Vice President of the Council of Ministers and Minister of Defence. A General in the Syrian Army after May 2011. Former Chief of General Staff of the Syrian Armed Forces.	Reportedly fled Syria on a Cham Wings plane from Damascus to Benghazi; likely to have then moved on to Russia. ⁴⁰⁹	Medium
Ali Mahmoud Abbas (EU and UK sanctioned)	علي محمود عباس	Minister of Defence	Last seen publicly on Syrian state television on 8 December 2024, claiming Syrian armed forces had put a halt to rebel advances. He reportedly boarded a flight from Damascus on 8 December 2024 to Benghazi, and likely moved on to Russia. ⁴¹⁰	Medium
Ali Mamlouk (EU, UK, and US sanctioned)	علي مملوك	Director of the National Security Bureau. Former Head of Syrian General Intelligence Directorate	A video purportedly showed Ali Mamlouk crossing al-Kabir River from Syria into northern Lebanon. A former security officer at the presidential palace confirmed that he had helped in the operation. Ali likely stayed a few months in Lebanon under the protection of Hezbollah. In early January 2025 a picture circulated on social media purportedly showing Ali Mamlouk's son Nizha in the Phoenicia Hotel in Beirut. He then moved to Moscow. ⁴¹¹	Medium

408- Feras Dalatey Sr., [“In the last days of Deterring the Aggression, I—like thousands of others—was tracking the private jet going back and forth between Damascus and Abu Dhabi...”](#) (in Arabic), Facebook post, 17 April 2025.

409- Solomon et al., [“The Vanishing Act: How Assad’s Top Henchmen Fled Syria, and Justice.”](#)

410- China in Arabic, [“General \(Lieutenant General\) Ali Mahmoud Abbas, Minister of Defense — the last Minister of Defense under Baathist rule”](#) (in Arabic), X post with video, 1:23, 9 December 2024; [“Al Jazeera Reveals Details of the Final Hours of the Escape of Assad Regime Officials”](#) (in Arabic), Al Jazeera, 13 December 2024; Solomon et al., [“The Vanishing Act: How Assad’s Top Henchmen Fled Syria, and Justice”](#); Dalatey, [“In the last days of Deterring the Aggression, I—like thousands of others...”](#)

411- Faour, [“Syrians Worried Fleeing Regime Officials Will Evade Justice, as Lebanon Denies Any Entered the Country”](#); Al Marsd, [“Watch: The Moment Ali Mamlouk, Head of National Security in Bashar al-Assad’s Regime, Escaped Using a Small Boat”](#) (in Arabic), Facebook post, 12 October 2024. The post was accessible during the team’s review on 29 November 2025 but is no longer available; Dara, [“Brewin Ibrahim to Rudaw After the Maher Video Spread”](#); Interview with a former regime insider, July 2025.

Aous Aslan (EU, UK, and US sanctioned)	أوس أطلان	Military major general, deputy commander of the Fourth Division	An investigation by The New York Times reported that he resides in Russia, without giving further details. ⁴¹²	Medium
Asma al-Assad (EU, UK, and US sanctioned)	أسماء الأسد	Wife of former President Bashar al-Assad	Flew to Moscow where she was granted “humanitarian asylum.” Currently living in Moscow. See: Bashar al-Assad. ⁴¹³	High
Ayman Jabir (EU, UK, and US sanctioned)	أيمن جابر	Prominent regime-linked businessman. Together with his brother Muhamad Jabir he led and/or supported the Desert Hawks pro-regime militia. Accused of involvement in the production of barrel bombs and smuggling. Formerly associated with Rami Makhlouf and linked to Maher al-Assad.	Unlike Muhamad Jabir, Ayman did not appear in public. But he is likely to have joined his brother in moving to Moscow. Ayan is wanted by the transitional government for his alleged role in or support to armed groups in Syria’s coastal area in March 2025. ⁴¹⁴	Medium

412- “[The Missing Enforcers of the Assad Regime.](#)”

413- “[Between Settlements and Exile, the Fate of Assad Regime Cronies](#)”; “[Ousted Syrian President Assad ‘Granted Asylum’ in Moscow – as Rebels ‘Guarantee Safety’ of Russian Military Bases,](#)” Sky News (UK), 9 December 2024.

414- “[Procedures Begin to Issue International Arrest Warrants for Brothers Ayman and Mohammed Jabir,](#)” Syrian Times, 30 March 2025.

Bashar al-Assad (EU, UK, and US sanctioned)	بشار الأسد	President of the Republic	Flew to Moscow where he was granted “humanitarian asylum.” Currently living in Moscow. Since posting a message on Telegram on 16 December 2024 he has not made any public appearance. According to a senior foreign diplomat, Bashar al-Assad stays in an apartment that used to be the home of former Soviet leader Leonid Brezhnev, in the Dorogomilovo District, an affluent Moscow neighborhood. However, the German weekly Die Zeit claimed that Bashar al-Assad moves between 20 apartments in a modern high-rise building in the business district of Moskwa City and a villa just outside Moscow. ⁴¹⁵	High
Fawaz al-Akhras (US sanctioned)	فواز الأخرس	Cardiologist and father of Asma al-Assad. He assisted, lobbied for, and gave advice to Bashar al-Assad in the regime’s media campaign in Europe.	After having been a long-term resident in London, Fawaz al-Akhras moved to Russia shortly after the Assad regime fell. ⁴¹⁶	High
George Haswani (EU, UK, and US sanctioned)	جورج حسواني	Leading regime-linked businessman, manager of the Scientific Studies and Research Centre (Jumraya branch). Financer of pro-regime Dir’a al-Qalamun militia.	While there have been no reports on his whereabouts, George Haswani is married to Kalina Nikova, a Russian citizen, and is therefore most likely to have moved to Russia. ⁴¹⁸	Medium

415- “[Between Settlements and Exile, the Fate of Assad Regime Cronies](#)”; “[Ousted Syrian President Assad ‘Granted Asylum’ in Moscow – as Rebels ‘Guarantee Safety’ of Russian Military Bases](#)”; Hadya Al Alawi, “[In Full: Former Syrian President Bashar Al Assad’s First Comments Since Fall of Regime](#),” The National News, 16 December 2024; Kefah Ali Deeb et al., “[The Silent Butcher](#)” (in German), Die Zeit, 12 October 2025; Interview with a senior foreign diplomat, July 2025.

416- Tareq Sobh, “[Fawaz al-Akhras... Assad’s Guardian in Britain](#)” (in Arabic), Syria TV, 24 December 2020.

417- According to the US Department of State, cited in “[US Treasury Sanctions Assad’s Father-in-Law](#),” Asharq Al-Awsat, 10 December 2024. — A well-informed Syrian source in the UK confirmed Fawaz al-Akhras moved to Russia.

418- “[Assad’s Businessmen: George Haswani](#)” (in Arabic), ProJustice.org, accessed 1 November 2025.

Hafez Bashar al-Assad (US sanctioned)	حافظ بشار الأسد	Son of former President Bashar al-Assad	Shortly before the fall of the regime, Hafez Bashar al-Assad obtained his PhD in mathematics at Moscow State University. On 12 February 2025 he released a video message on social media, showing himself while walking in a Moscow street. The authenticity of the video message can be confirmed. ⁴¹⁹	High
Imad Mtanyus Khuri (EU and US sanctioned)	عماد خوري	Russia-based businessman who allegedly facilitated financial transactions for the Assad regime and a network of companies and offshore businesses; accused of an attempted purchase of a chemical weapons compound.	As his businesses are in Russia and he has Russian citizenship, he is likely to reside in Russia.	Medium
Issa al-Zeydi (US sanctioned)	عيسى الزيدي	Businessman who owned and directed a Cyprus-based company accused of facilitating financial transactions for the regime to purchase fuel and thus circumvent sanctions.	Issa al-Zeydi holds Russian citizenship and is therefore likely to reside in Russia. His companies in Cyprus, Piruseti, and Frumineti appear to have been dismantled.	Medium

419- Almarshhad Media, “[In his first appearance... a circulating video of Hafez Bashar al-Assad, son of the former Syrian president, from the streets of Moscow](#)” (in Arabic), Instagram post with video, 12 February 2025; Al-Arabi – Akhbar, “[For hours... an account on X under the name of Hafez Bashar al-Assad publishes details of the family's escape to Moscow – what's the story?](#)” (in Arabic), Facebook post with video, 3:58, 11 February 2025; Al Arabiya, “[Surprises Revealed by the First Appearance of 'Hafez Bashar al-Assad'](#)” (in Arabic), YouTube Shorts video, 1:46, 13 February 2025. — Comparing the footage with street view on Google Maps, it can be confirmed that it was recorded on Ulitsa Bol'shaya Ordynka, Moscow, Russia, 115035. — “[Culinary Shop Karavaevs Brothers](#),” Google Maps Street View, accessed 1 November 2025.

Jamil Hassan (EU, UK, and US sanctioned)	جميل حسن	Key regime security official, formerly head of Air Force Intelligence Directorate and member of the regime's inner circle.	Reportedly fled to Beirut, where he received medical treatment at the American University in Beirut. He then moved on to Moscow despite Lebanese government assurances to arrest him in accordance with an Interpol warrant. In December 2025 current and former Syrian and Western officials cited by the Wall Street Journal said he had moved back to Lebanon. ⁴²⁰	Medium
Jamal Younes	جمال يونس	Major general in the Fourth Division; he ordered troops to open fire on unarmed protestors and was involved in mass executions.	An investigation by the New York Times found that he resides in Russia. No other available sources confirm this. ⁴²¹	Medium
Kamal al-Hassan (US sanctioned)	كمال الحسن	Major General, head of regional branch Military Intelligence Directorate, former head of Palestine Branch 235. Allegedly involved in large-scale extortion of prisoners' relatives.	Kamal al-Hassan was reported to have been wounded in a firefight with rebel forces and then taken in by the Russian embassy in Damascus. He was one of the signatories of the 6 March 2025 public statement made by the "Military Council to Liberate Syria" announcing military operations on the west coast of Syria, for which he statedly led operations in the Tartus area. Yet several reports later claimed he resides in Moscow, Russia. ⁴²²	Medium
Kinda Muhamad Makhlof (US sanctioned)	كندة محمد مخلوف	Daughter of the late Muhamad Makhlof (designated), sister of Rami Makhlof.	Kinda Makhlof owns an apartment in Moscow and likely inherited other real estate in that city from her father; she is therefore likely to reside in Russia. One reliable source claimed she is "in a European country" but did not provide any details. ⁴²³	Medium

420- ["Interpol Issues Warrant for Syrian Regime Intelligence Chief as Dozens of Regime Officers Detained in Lebanon,"](#) The New Arab, 21 December 2024; Kanishka Singh, ["Two Former Syrian Intelligence Officials Face US War Crimes Charges,"](#) Reuters, 9 December 2024; ["Lebanon to Cooperate with Interpol on Arrest of Syrian Official Accused of War Crimes,"](#) The Straits Times, 24 December 2024; Dara, ["Brewin Ibrahim to Rudaw After the Maher Video Spread";](#) Interview with a former regime insider, July 2025; Malsin and Said, ["The Hunt for Assad's Brutal Enforcer."](#)

421- Solomon et al., ["The Vanishing Act: How Assad's Top Henchmen Fled Syria, and Justice."](#)

422- Dara, ["Brewin Ibrahim to Rudaw After the Maher Video Spread";](#) Solomon et al., ["The Vanishing Act: How Assad's Top Henchmen Fled Syria, and Justice."](#)

423- Henry Foy, ["Syria: Assad, His Cousins and a Moscow Skyscraper,"](#) Financial Times (subscriber-only content), 10 November 2019; Al Jazeera Arabic, ["Al Jazeera Investigations | Palace Money... Revealing the Assad Regime's Economic Connections Despite Sanctions"](#) (in Arabic), YouTube video, 47:54, 27 December 2020; Interview with a former regime insider, July 2025.

Maher al-Assad (EU, UK, and US sanctioned)	ماهر الأسد	Brother of President Bashar al-Assad, commander of the Fourth Division, responsible for mass violence and involved in numerous businesses and in the illicit captagon trade.	Maher al-Assad is believed to have fled Syria by crossing into Iraq via Deir Ezzor. He reportedly stayed in Sulaymaniya, allegedly hosted by Bafel Jalal Talabani, the leader of the PUK. Iraqi authorities denied these reports. He then moved on to Russia, where in early June 2025 he was filmed in a café in Afimall, a shopping center in Filyovsky Park District, Moscow. ⁴²⁴	High
Mansour Fadlallah Azzam (EU, UK and US sanctioned)	منصور فضل الله عزام	Minister for presidential affairs, close advisor to President Bashar al-Assad	Mansour Azzam reportedly accompanied Bashar al-Assad on his flight to Moscow. ⁴²⁵	Medium
Muhamad Jabir (EU, UK and US sanctioned)	محمد جابر	Former pro-regime militia leader and associate of Maher al-Assad.	In an interview speaking from Moscow, Muhamad Jabir acknowledged responsibility for regime remnants' attacks on transitional government security forces on the west coast in March 2025. The transitional government responded by seizing his assets, and in March prepared an international arrest warrant. However, Interpol does not list any public "Red Notice" against Jabir. He is believed to regularly travel to Iran. ⁴²⁶	High

424- ["Iraqi Interior Ministry Denies Presence of Maher al-Assad in Iraq,"](#) The Syrian Observer (source: Shaam Network — opposition website), 18 December 2024; Dana Taib Menmy, ["Iraqi and Kurdish Authorities Refute Claims Maher al-Assad Secretly Entered Country,"](#) The New Arab, 18 December 2024; ["Is Maher al-Assad Present in Iraq?... Baghdad Responds"](#) (in Arabic), Al-Hadath (Al Arabiya), 17 December 2024; ["Where's the Gold?: How the Assads Sucked Syria Dry,"](#) ["Brewin Ibrahim to Rudaw After the Maher Video Spread,"](#) Solomon et al., ["The Vanishing Act: How Assad's Top Henchmen Fled Syria, and Justice."](#)

425- ["Associates of Bashar al-Assad Fled by Various Means After Being Surprised by His Escape"](#) (in Arabic), Al Jazeera Arabic, 22 December 2024; ["How Assad's Inner Circle Fled Syria After His Fall."](#)

426- Nedaa Post, ["Former regime figure Ayman Jaber admits responsibility for the coastal attack against General Security"](#) (in Arabic), Instagram post with video, 10 April 2025; ["International Arrest Warrants Expected Soon for Ayman and Mohammed Jaber Over Involvement in the Coastal Massacres"](#) (in Arabic), Ultra Syria, 30 May 2025; Syrian Observatory for Human Rights, ["Muhamad Jaber — the Syrian businessman and former commander of the Desert Hawks — admits on Al-Mashhad..."](#) (in Arabic), Facebook post with video, 26:59, 8 April 2025; ["View Red Notices,"](#) Interpol, accessed 1 November 2025; Interview with a former regime-insider, July 2025.

Mujahed Ismail (EU and UK sanctioned)	مجاهد اسماعيل	Member of the regime's "electronic army." Senior member of the Ba'ath Battalions pro-regime militia.	A video circulated on social media purportedly showing Mujahed Ismail crossing the Arida border crossing with Lebanon by boat, directly after the fall of the regime. He then moved into the border area between Syria and Lebanon until he was reportedly arrested in February 2025 by security forces linked to the transitional government. He is believed to have been released a few months later, after which he moved to Moscow. ⁴²⁷	Medium
Qahtan Khalil (EU and US sanctioned)	قحطان خليل	Key security official. Head of Air Force Intelligence Directorate.	Reliable sources confirm that Qahtan Khalil was on a flight from Damascus to Benghazi shortly before the fall of the regime. With the Russian military present in the Libyan city controlled by warlord Khalifa Haftar, he was able to move on to Russia. ⁴²⁸	Medium
Suheil al-Hassan (EU, UK, and US sanctioned)	سهيل الحسن	Commander of the Tiger Forces militia (Division 25 Special Mission Forces),	Suheil al-Hassan appears to reside in Russia. He reportedly traveled from Russia to Lebanon using a Russian passport. According to security sources, al-Hassan led armed groups in the Latakia countryside where these groups carried out operations against the new Syrian security forces. The groups are accused of being part of the "remnants of the former regime" trying to destabilize the country. ⁴²⁹	Medium

427- Tamer Turkmane, ["Who Is Mujahid Ismail, Who Fled from the al-Arida Crossing in Tartous by a Small Boat After the Fall of the Assad Regime"](#) (in Arabic), Facebook post with video, 0:24, 12 December 2024; Sada 24, ["Haydara Suleiman, son of the late Syrian general and ambassador, reveals..."](#) (in Arabic), Facebook post, 11 January 2025; Families of Detainees and Forcibly Disappeared – Syria, ["The criminal Mujahid Ismail is in Lebanon and was seen multiple times..."](#) (in Arabic), Facebook post, 10 April 2025; Interview with a former regime insider, July 2025; Ali Ferzat, ["Today Mujahid Ismail – ... – has been arrested..."](#) (in Arabic), Facebook post, 28 February 2025.

428- ["Al Jazeera Reveals Details of the Final Hours of the Escape of Assad Regime Officials"](#); Dalatey, ["In the last days of Deterring the Aggression..."](#); Solomon et al., ["The Vanishing Act: How Assad's Top Henchmen Fled Syria, and Justice"](#); Interview with a former regime insider, July 2025.

429- ["New Appearance of Suheil al-Hassan and Reports Speak of Coordination with Bashar al-Assad – What Is Happening on the Syrian Coast?"](#) (in Arabic), Hona Lebanon, 6 March 2025; Turki al-Jasem, ["General Hassam Louqa and Major General Suheil Hassan entered Lebanon... coming from Russia..."](#) (in Arabic), Facebook post, 28 August 2025; Solomon et al., ["The Vanishing Act: How Assad's Top Henchmen Fled Syria, and Justice"](#); ["The Missing Enforcers of the Assad Regime."](#)

Yusuf Arbash (US sanctioned)	يوسف عربش	Head and director of Hesco Engineering and Construction (also designated); involved in oil smuggling for the former Syrian regime. He is linked to George Haswani (also designated) who is his father-in-law.	Arbash ran Hesco from Russia and holds Russian citizenship. He is likely staying in Moscow. ⁴³⁰	Medium
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Name		Short bio	Whereabouts	Level of confidence
Adib Mayaleh (EU, UK, and US sanctioned)	اديب ميالة	Former governor of the Central Bank, former Minister of Trade and Economy, affiliated with and providing services for al-Qatarji businesses.	Although sanctioned, Adib Mayaleh lives in France under the name André Mayard. Court proceedings have been initiated against him in France on charges of war crimes. However, opposing views within the French judiciary about jurisdiction issues and functional immunity have been delaying his trial. In July 2025 France's Supreme Court ruled that the functional immunity invoked by Mayaleh could not be applied, allowing for the trial to go ahead. ⁴³¹	High

430- US Department of the Treasury, Office of Foreign Assets Control (OFAC), "[Revocation of Syria Sanctions; Publication of Syria Frequently Asked Questions; Syria and Syria-Related Designation Updates and Removals](#)," press release, 30 June 2025, amended 4 August 2025; Interview with a former regime insider, July 2025.

431- AFP, "[War in Syria: Appeal Decision on 15 January on the Role of the Former Central Bank Governor](#)" (in French), JusticeInfo.net, 7 November 2024; "[The Paris Court of Appeal Rejects Functional Immunity of Former Syrian Central Bank Governor Adib Mayaleh](#)," International Center for Transitional Justice (ICTJ), 13 June 2024; "[Paris Court of Appeal Overturns Immunity of Former Syrian Central Bank Governor Adib Mayaleh](#)" (in Arabic), Syrian Center for Media and Freedom of Expression (SCM), 6 June 2024; AFP, "[Arrest Warrant Targeting Bashar al-Assad: France's Highest Judicial Authority to Review Its Validity on 4 July](#)" (in French), JusticeInfo.net, 24 March 2025; "[France: In a Landmark Decision, the Supreme Court Rejects the Application of Functional Immunity in Cases of International Crimes](#)," FIDH – International Federation for Human Rights, 25 July 2025.

Salah Habib (US sanctioned)	صلاح حبيب	Salah Habib, served as owner and CEO of Yona Star (also US designated) and was a key figure in a network of intermediary and logistics firms based in the UAE that shipped sensitive merchandise and war materials to Syria. The SSRC regularly used Habib's network to procure and send merchandise in violation of Western sanctions against Syria, including for its chemical weapons program.	Salah Hadid was extradited by the UAE to France in December 2021, immediately after the US designated him and Yona Star. He was arrested and currently faces trial in France on charges of war crimes and sanctions violations. ⁴³²	High
Atiya Khoury (US delisted)	عطية خوري	Financial middleman who, in Moscow and elsewhere, facilitated transactions and fuel procurement for the regime, the Assad family, and Rami Makhlouf.	Atiya Khouri obtained permanent residence or a "golden visa" in Hungary in 2017. There is also a possibility that he still resides in Russia or moves between the two countries. ⁴³³	Medium

432- Madjid Zerrouky, "[A Franco-Syrian Prosecuted in France for 'Complicity in Crimes'](#)" (in French), Le Monde (subscriber-only content), 14 January 2022; "[France Accuses Syrian of 'Committing War Crimes'](#)," Middle East Monitor, 17 January 2022.

433- Blanka Zöldi, "[MP Files Criminal Complaint over Hungarian Residence Permit of the Syrian Dictator's Moneyman](#)," Direkt36, 5 July 2018.

Appendix 2: Status of sanctioned companies and companies owned by sanctioned individuals

Sanctioned companies still operating without known restructuring

Company name		Role under Assad regime and ownership	Current status
Al-Adham Exchange Company (US sanctioned)	شركة الأدهم للصرافة	Al-Adham Exchange was placed under US sanctions pursuant to the Caesar Act for allegedly facilitating millions of dollars in transfers since 2021 benefiting the Assad regime. It is owned by the Qantaqji family (Dimitri, Emad, Omar, Mahmoud, and Hoda).	After being placed under US sanctions in May 2023, Al-Adham Exchange was renamed Du Exchange, creating a Facebook page under this name on 18 March 2024. Under this new name it continued to be licensed without a change of ownership while operating from the same address in Damascus. After the fall of the regime, it continued operating as Du Exchange without any restructuring or change of ownership. It holds the same registration number and certificate of Al-Adham Exchange (15691) as it appears on the Syrian Commission of Financial Markets and Securities. ⁴³⁴

434- Visit to Al-Adham / Du Exchange main office in Damascus, July 2025; “[Al Adham Foreign Exchange](#),” Syrian Commission of Financial Markets and Securities, accessed 1 November 2025; “[Branch Addresses of Al Adham Company in Syria and Its Provincial Offices](#)” (in Arabic), Kazawallet, accessed 1 November 2025; “[Al Adham Exchange](#)” (in Arabic), Syrian Commission of Financial Markets and Securities, accessed 1 November 2025; DU Exchange, [Profile Page](#), Facebook, accessed 1 November 2025; “[Syria Economic Players React to Regime Collapse](#),” The Syria Report (subscriber-only content), 11 December 2024; DU Exchange, “[Profile: About](#),” Facebook, accessed 1 November 2025; “[Adham Exchange – Company Information](#)” (in Arabic), Syrian Commission on Financial Markets and Securities, accessed 1 November 2025.

Al-Dj Group (EU and US sanctioned)	مجموعة الدج التجارية	Al-Dj Group is a Damascus-based Syrian company, owned and managed by Mahmoud al-Dj (also designated), and active in various sectors including tourism and transport. Its subsidiaries and linked companies include Free Bird and al-Ta'ir. Al-Dj group and/or its subsidiaries have branches in Dubai and Greece, as well as an office in Libya. Al-Dj Group, its subsidiaries and owner, were accused of involvement in smuggling weapons, mercenaries and drugs. Al-Dj group includes Al-Tayr al-Hur travel company, Nabd al-Sham agency for Hajj travel, Golden Hands Employment Agency, MD Textile factory, and Samat al-Sham restaurant.	Al-Dj Group's main office in Damascus's Free Zone area off Abu Bakr al-Sadiq Street continues to be open for business. The company also still runs an office in Benghazi. The company's ownership and management appear to be unchanged, and there have been no reports of the company being restructured. Al-Dj Group seems to play a pivotal role in the resumption of international flights in June 2025 to and from Damascus by Greek and Bulgarian private airline companies Air Mediterranean and Dan Air. These activities also connect Al-Dj Group to suspected arms dealer Majd Hussein al-Deiry, who is wanted by the FBI and sanctioned by the US (for further details, see the main text of this report).⁴³⁵
Ali Najib Trading Establishment [Owner(s) sanctioned by EU]	مؤسسة علي نجيب للتجارة	Ali Najib Ibrahim was sanctioned for owning several (shell) companies, including in telecommunications and tourism, that were used as fronts for the Assad regime.	In May 2025 Syriatel's annual report listed Ali Najib Trading Establishment among companies still contracting with Syriatel. A media investigation also found that Ali Najib Ibrahim, via his shares in Sawari Tourism Investments Company, invests in Junada Resort in Tartous.⁴³⁶

435- Visit to Al-Dj Group main office in Damascus, June 2025; ALDJ GROUP, "[ALDJ Group – founded in 2019 to...](#)" (in Arabic), Facebook post, 2 November 2024; Basiki et al., "[Mediterranean Airlines: A Greek carrier flying to Damascus in cooperation with individuals accused of arms- and migrant-smuggling](#)" (in Arabic); US Department of the Treasury, "[Treasury Targets Belarusian Sanctions Evasion Networks and Cogs in Russia's War Machine](#)," press release, 15 April 2024; US Federal Bureau of Investigation, "[Wanted by the FBI: Mohamad Majd Deiry](#)," accessed 1 November 2025.

436- "[SyriaTel Mobile Telecom Public Joint-Stock Company – Consolidated Financial Statements, 31 December 2024](#)" (in Arabic), Internet Archive, archived 15 June 2025, accessed 1 November 2025; Sidra al-Hariri,

Al-Jabal Company for Protection and Bodyguard Services (EU and US sanctioned)	شركة الجبل لخدمات الحماية والحراسة	Al-Jabal was established in 2020 under the name Al-Areen Security Services and was affiliated with the Saraya al-Areen 313 militia linked to the MID and Iran. The company is owned by brothers Osama and Amer al-Maliki.	The company appears still active without known restructuring or a change of ownership. ⁴³⁷
Al Haram for Transfer Money (US sanctioned)	شركة الهرم للحالات المالية	The company is the largest money exchange office in Syria and is owned by Fouad Assi. It was used by the Assad regime for financial transactions, money laundering, currency speculation, and circumventing sanctions. Until 2024, UN humanitarian agencies—including the UNDP, UNFPA, UNICEF, and the FAO—also made use of its financial services. In January 2021, ostensibly to circumvent the sanctions imposed on Al Haram, its owner created a new company under the name Light for Money Transfer.	Al Haram and its subsidiary Light for Money Transfer are still operating in Damascus and throughout the country. Fouad Assi was reportedly in contact with the transitional government's Economic Committee, likely in negotiations about a settlement. However, no deal was reported. The company is not known to have been restructured. On 22 March 2025, a video circulated on social media showing a confrontation between a group of Damascus residents and the bodyguards of Fouad Assi. ⁴³⁸
Desert Falcon Ltd [Owner(s) sanctioned by EU, UK, and US]	شركة صقر الصحراء المحدودة	Trading company owned by Bilal al-Na'al and Fadi Saqr. The company received contracts from the United Nations Children's Fund (UNICEF) worth more than USD 2 million. It also has a branch in Lebanon—Desert Falcon for General Trading.	Both owners reached separate settlements with the transitional government. The company, including its branch in Lebanon, is believed to continue its operations without being restructured or forced into a change of ownership. However, the transitional government dispatched an officer of General Security to monitor the company. ⁴³⁹

437- "[Osama Muhamad al-Malki – Profile](#)" (in Arabic), Manhom.com, accessed 1 November 2025; "[Amer Muhamad al-Malki – Profile](#)" (in Arabic), Manhom.com, accessed 1 November 2025; Manhal Baresh, "[Private Security Companies in Syria: New Agents at the Regime's Service](#)," European University Institute – Middle East Directions, 10 September 2020. – The [company website](#) is still active.

438- "[Procurement Data by Supplier](#)," United Nations Global Marketplace (UNGM), accessed 1 November 2025; Hareme Financial Transfers, [Profile Page](#) (in Arabic), Facebook, accessed 1 November 2025; "[Home Page](#)" (in Arabic), Hareme Pyramid Financial Transfers, accessed 1 November 2025; "[Between Settlements and Exile, the Fate of Assad Regime Cronies](#)"; Muhamad al-Sheikh, "[Syria: Fouad Asi Appears in Damascus After a Massive Financial Settlement](#)" (in Arabic), Al-Modon, 22 March 2025.

439- Syrian Legal Development Program and Observatory of Political and Economic Networks, Karam Shaar, "[UN Procurement Contracts in Syria: A 'Few' Bad Apples?](#)" (Investigation Report), 25 October 2022; Observatory of Political and Economic Networks (OPEN), "[Syrian Suppliers to the UN \(2019–2023\): A Comprehensive Map](#)" (interactive network map), accessed 1 November 2025; Whatsapp communication with a government advisor in Damascus, October 2025.

MHD Nazier Houranieh & Sons Co (EU sanctioned)		Canada-registered company sanctioned for having supplied the Syrian Studies and Research Centre with materials used for the development and manufacturing of chemical weapons. Associated with Muhamad Nazier Houranieh and Chadi Houranieh (both designated and holding Canadian citizenship).	According to his personal Facebook page, Chadi Houranieh lives in Beirut. The company reportedly works from Damascus and Beirut. In Syria its main office is in Zoukak al-Jin, Abd al-Rahman Bin al-Kassem Street, Damascus, which seems open for business. The company's website appears active. ⁴⁴⁰
Mirza Group (EU and UK sanctioned, US delisted)	شركة ميرزا	Mirza Group is a joint venture between Damascus Cham Holding (which, after the fall of the regime, was placed under new management) and Talas Group (owned by Anas Talas) for the construction of Marota City.	Talas Group is not known to have been dissolved or restructured, and its owner Anas Talas still is in Syria. As building in Marota City continues, it seems Mirza Group and Talas Group are still active.
Pangates International Co. / Abdul-Karim Group (EU, UK, US delisted)	بان غيتس إنترناشيونال	Company registered at Sharjah International Airport Free Zone, owned and/or managed by Wael Abdul-Karim and Ahmad Barqawi (a Palestinian-Syrian national), both Dubai-based. Pangates acted as an intermediary in the supply of oil and military aircraft fuel to the Syrian regime in violation of sanctions.	The company was delisted by the UK, EU, and US on 6 March, 28 May, and 30 June 2025 respectively. The lifting of sanctions against the company was welcomed by the Syrian transitional government. However, the company's website is disabled, and the UAE's commercial registry does not contain an entry for it. There have been no reports on the company restructuring or a change of ownership. ⁴⁴¹

440- Chadi Houranieh, "[Profile Page](#)," Facebook, accessed 1 November 2025; "[Home Page](#)," Mhd Nazier Houranieh and Sons Company, accessed 1 November 2025; "[Syria: Canadian Owners of Houranieh & Sons Sanctioned by EU for Allegedly Supplying Assad's Chemical Weapons; Including Company Comments](#)," Business & Human Rights Resource Centre, 15 June 2023.

441- "[Assad's Businessmen: Wael Abdel Karim](#)" (in Arabic), ProJustice.org, accessed 1 November 2025; "[Syria Welcomes UK Decision to Remove 24 Syrian Entities From Sanctions List](#)," Syrian Arab News Agency (SANA), 7 March 2025.

Sanctioned companies that were restructured, seized or dissolved

Company name		Role under Assad regime and ownership	Current status
Al-Aqila Takaful Insurance (EU and UK delisted)	شركة العقيلة	Al-Aqila Takaful Insurance was owned and operated by influential businessmen linked to the Assad regime, including Aji Najib Ibrahim, Badi Droubi, Fahad Darwich, and Ahmad Hussein al-Ali. It provided financial and commercial services to the Assad regime.	In February 2025, Minister of Finance Muhamad Abazid dissolved the board of directors of the company and appointed Kifah Ahmad al-Musa al-Farmaly as acting manager until a new board of directors can be appointed. ⁴⁴²
Al-Fadel Exchange and Money Transfer Company (US sanctioned)	شركة الفاضل للصرافة والتحويلات المالية	The company was accused of providing financial services to the Assad regime and Hezbollah, including money laundering. The owners of the company are Fadel, Mutee, and Muhamad Balwi.	On 11 June 2025 the Syrian Central Bank canceled the license for Al-Fadel Exchange and liquidated the company. Fadel and Mutee Balwi reportedly left Syria for Türkiye; their brother Muhamad Balwi remains in Damascus to address pending matters, making frequent visits to Beirut. When visiting the company's offices in Damascus in August 2025, all turned out to be closed. ⁴⁴³
Cham Islamic Bank (US delisted)	بنك شام الإسلامي	Cham Islamic Bank was sanctioned by the US for supporting the Assad regime. It was owned by several Kuwaiti, Saudi, and Syrian businessmen including Ahmad Kuzbari and Samer Foz (via Aman Holding).	The board of directors of the bank was dissolved on 29 May 2025, reportedly due to alleged involvement in fictitious loans and corruption involving Samer Foz. It is not clear what new board has been created or what happened to the bank's assets.

442- [“Caretaker Government Intensifies Its Control Over the Business Community,”](#) The Syria Report (subscriber-only content), 4 March 2025; [“About Us”](#) (in Arabic), Al-Aqeelah Insurance Company, accessed 1 November 2025; Al-Aqeelah Takaful Insurance, [Profile Page](#), LinkedIn, accessed 1 November 2025; [“Al-Aqeelah Takaful Insurance – Board of Directors Restructuring Notice”](#) (in Arabic), Syrian Commission on Financial Markets and Securities, accessed 1 November 2025.

443- [“Syria’s Financial Revamp Begins to Take Shape”](#); [“Exclusive – Revealing the Secrets of al-Fadel Company, Hezbollah’s New Financial Arm Abroad”](#) (in Arabic).

Cham Wings Airlines (EU and US sanctioned)	أجنحة الشام للطيران	Cham Wings Airlines used its flights to transport Syrian mercenaries and to facilitate arms smuggling, narcotics trafficking, and money laundering. It was owned by Muhamad Issam Shammout (also designated), a close associate of Rami Makhlouf. In 2020, a UAE-registered company, Rawdat al-Rif, acquired a stake in Cham Wings.	Cham Wings was renamed Fly Cham on 8 May 2025. It is now formally owned by a newly established Syrian subsidiary of Rawdat al-Rif. The timing of the ownership transfer and the rebranding suggests they may have been intended to obscure Shammout's continued control despite his sanctions designation. ⁴⁴⁴
Damascus Cham Holding (EU and UK sanctioned, US delisted)	شركة دمشق الشام القابضة	Private shareholding company set up to build and develop high-end real estate in Marota and Basilia City, southeast of Mezzeh, Damascus. Its board of directors was chaired by the governor of Damascus. The company stood accused of violating property rights of original owners in the area, many of whom were displaced, and failing to compensate them fairly. Main shareholders included the Qatarji Group (Hussam Qatarji), Mazen Tarazi, Samer Foz, Khaled al-Zubeidi, Nader Qala'i, Bilal al-Na'al, and Anas Talas (all	On 26 December 2024, the interim governor of Damascus, Maher Marwan ("Maher al-Idlibi"), announced the formation of a joint committee from the Ministry of Public Works and Damascus governorate looking into the future of the Marota and Basilia City project and the complexities around compensation mechanisms for original owners. Its tasks were to "cooperate" with Damascus Cham Holding in "reaching an acceptable solution," without stipulating a restructuring of the holding as such. While no clear measures have been taken yet to address original owners' grievances or the holding's future status, on-site building and sales have continued. Any restructuring of the holding's ownership has come to depend on the fate of its individual investors. Only the Qatarji Group's assets in Syria are so far confirmed to have been seized, leaving open the possibility that other key designated investors retained their stakes. ⁴⁴⁵

444- Azhari and Dalatey, ["Syria Is Secretly Reshaping Its Economy. The President's Brother Is in Charge"](#); al-Hamdo et al., ["Flying Under the Radar"](#) (in Arabic); ["Syria Commercial Consultancy Company – Profile"](#) (in Arabic), Manhom, accessed 1 November 2025; "Entry related to the establishment of Cham Wings" (in Arabic), Syrian Gazette no. 17 (2009); "Entry related to corporate changes concerning Cham Wings/Fly Cham" (in Arabic), Syrian Gazette no. 11 (2025); "Entry related to corporate changes concerning Cham Wings/Fly Cham" (in Arabic), Syrian Gazette no. 16 (2025).

445- Down With the Unjust Decree 66, ["Down with the unjust Decree 66, to the Governor of Damascus tasked with transitional justice..."](#) (in Arabic), Facebook post with video, 1:12, 25 December 2024; "Home Page," Marota City, accessed 1 November 2025; Maria Mardach, ["Victims of Decree 66 Renew Their Demands for Their Rights"](#) (in Arabic), Enab Baladi, 23 March 2025; ["Fake Ads Spread on Social Media to Burnish the Reputation of 'Marota City': Who Sells and Who Buys?"](#) (in Arabic), Noon Post, 21 April 2025; Akhbar al-Sina'a al-Suriyya, ["The Marota City project is rising again in Damascus..."](#) (in Arabic), Facebook post, 20 March 2025; ["Marota and Basilia City After Assad: A Postponed Project and Applicants Without Housing,"](#) The Syria Report (Housing, Land & Property Rights), 6 May 2025; Interviews held on-site in Marota City with workers and an engineer formerly employed by Qatarji Holding, Damascus, June 2025.

Ebla Hotel (US delisted)	فندق إيبلا	Co-owned by the late Nader Qala'i (designated); after his death in February 2021 it possibly passed to his widow and three sons and two daughters residing in Canada, and to Khalid Bassam Zubeidi (also delisted). Yassar Ibrahim is believed to have co-owned the hotel.	The five-star Ebla Hotel and its Omayad Palace for Conferences were seized by HTS after 8 December 2024. The rooms are used by HTS civil servants who relocated from Idlib to Damascus. When trying to book a room via the official website, the reservation page indicates that the hotel is no longer offering rooms. ⁴⁴⁶
Emma Tel LLC (US sanctioned)	شركة إيماتيل	Emma Tel was a distributor of telephone and IT products. It was owned by Khodr Ali Taher (also designated).	Emma Tel LLC was dissolved and ceased operations. Other assets of Khodr Ali Taher were seized in Homs, Damascus, and Latakia. ⁴⁴⁷
Four Seasons Hotel Damascus (EU and US delisted)	فندق فور سيزنز دمشق	Samer Foz bought the hotel from Al-Waleed bin Talal in early 2018. The international chain Four Seasons ended its tenure of the hotel in June 2019. Until at least 2024, UN agencies, including UNICEF, hired its facilities and services.	The Four Seasons hotel is believed to have been seized by the transitional government as part of Samer Foz's portfolio. However, no official statement was made to this effect. It remains unclear whether or how the hotel has been placed under new management, restructured, and/or had its ownership changed. ⁴⁴⁸

446- Interviews with government advisors, July 2025; ["Ebla Hotel – Single Room Page,"](#) Ebla Hotel, accessed 1 November 2025.

447- ["Former Regime-affiliated Businessmen Seek to Save Their Businesses"; "Discovery of Secret Prison and Remains in Abu Ali Khodr's Warehouse,"](#) The Syrian Observer (sourced from Damascus Voice), 26 January 2024; ["Security Source Reveals Why Asma al-Assad Is Angry at Businessman Abu Ali Khodr"](#) (in Arabic); ["To Relinquish His Wealth Outside Syria... 'Abu Ali Khodr' Placed Under House Arrest"](#) (in Arabic).

448- Interviews with businessmen in Damascus, May–June 2025.

Foz for Trading and Aman Holding Company (EU, UK, and US sanctioned)	شركة فوز للتجارة شركة أمان القابضة	Samer Foz controlled a vast business empire of companies in multiple sectors, mainly through Foz for Trading and Aman Holding companies.	Reuters reported in July 2025 that a deal was reached where Foz handed over 80 percent of his assets (presumably those assets in Syria) valued at USD 800 million–1 billion, including a large sugar refinery. Earlier, in February, it was reported that Syrian Modern Cables company, part of Foz’s large conglomerate of companies, had been returned to the Ghreiwati family, the original owner. A significant portion of Foz’s assets—including real estate, possibly the Four Seasons hotel, companies, and vehicles—have been confiscated. Yet insufficient details have emerged to pinpoint exactly which of Foz’s companies were confiscated and/or restructured, or remained under his control. Foz may still have control over assets belonging to Aman Holding in Marota through Damascus Cham Holding. Foz holds significant assets abroad, including in the UAE.⁴⁴⁹
Hadid Metal Manufacturing Company (as part of Hmisho International Group and/or Hmisho Trading) (EU, UK, and US sanctioned)	شركة الصناعات المعدنية حديد كجزء من مجموعة حمشو الدولية و/أو حمشو للتجارة	Hadid Metal Manufacturing Company was part of Hmisho International Group and/or Hmisho Trading, owned by Muhamad Hamsho.	The factory owned by Hadid Metal Manufacturing was seized by the state as part of a larger settlement where Muhamad Hamsho retained a portion (estimated at 20 percent) of his assets linked to Hmisho International Group, Hmisho Trading and other companies linked to him. It is unclear exactly which companies Hamsho retained ownership of, to whom or what ownership was transferred, and what these changes implied for management. Hadid Metal company, however, was placed under a “legal guardian” while leaving all other arrangements involving the company in place.⁴⁵⁰

449- “[Syrian Modern Cables \(SMC\)](#),” The Syria Report (subscriber-only content), 27 January 2025; “[Q&A: Deputy Caretaker Minister of Economy for Industrial Affairs, Mohammed Yassin Hourieh](#),” The Syria Report (subscriber-only content), 3 February 2025; “[Government Reshuffles Chambers of Commerce](#),” “[Between Settlements and Exile, the Fate of Assad Regime Cronies](#)”; Azhari and Dalatey, “[Syria Is Secretly Reshaping Its Economy. The President’s Brother Is in Charge](#).”

450- “[Hadeed Metal Manufacturing](#),” The Syria Report (subscriber-only content), 25 June 2020; “[Q&A: Deputy Caretaker Minister of Economy for Industrial Affairs, Mohammed Yassin Hourieh](#)”; Metal Manufacturing Company Hadeed, [Profile Page](#) (in Arabic), Facebook, accessed 1 November 2025; Interview with a private metal business owner, Damascus, 23 July 2025.

Massa Plaza Mall [US delisted, operator(s) still EU sanctioned]	مول ماسة بلازا	Major shopping mall owned by Damascus governorate and leased to Wassim Anwar al-Qattan (designated) after its concession was held by Bilal al-Na'al (also designated).	The mall is still open for business, per its last activity on Facebook. In May 2025 Wassim al-Qattan reportedly renegotiated the terms of his lease of Massa Plaza Mall for USD 17.3 million. However, his lease is believed to be held through his brother Muhamad al-Qattan, and shared with Hussein al-Salama, the head of the new General Intelligence Service. Wassim al-Qattan is believed to still be in Syria, but he denied negotiating or having reached a settlement with the interim authorities.⁴⁵¹
MTN / Tele Invest [Owner(s) sanctioned by EU, UK, and US]	ام تي ان سوريا	Mobile phone network operator MTN was of Tele Invest (an unsanctioned entity), which held 73 percent of its shares, along with numerous fronts.	MTN was placed under legal guardianship. The Economic Committee appointed Muhamad al-'Isa as MTN's legal guardian. He had been an aide to the late Hassan Turkmani—a senior military and security officer—but was serving a prison sentence on unknown charges and was released when the Assad regime fell. When in February 2025 he took charge of MTN, many of the company's employees were found guilty of corruption and dismissed. Under the new arrangements, Yassar and Nisreen Ibrahim lost control over both Tele Invest and MTN. Tele Invest's official director since 2018, Muhamad Gharib Hamdoun, is still mentioned as formally holding on to his position. In contrast, and despite his role as legal guardian, Muhamad al-'Isa is not mentioned in MTN's recent official documentation or communications. In September 2025 he was removed from MTN in a government reshuffle involving those engaging with the telecommunications sector.⁴⁵²

451- Massa Plaza Midan, "[Profile Page](#)" (in Arabic), Facebook, accessed 1 November 2025; "[Massa Plaza Mall in Maliki](#)" (in Arabic), Business 2 Business Syria, accessed 1 November 2025; Whatsapp conversation with an advisor to the transitional government, October 2025.

452- Interviews with businessmen and a transitional government advisor in Damascus, May-July 2025; "[Who We Are](#)" (in Arabic), MTN Syria, accessed 1 November 2025; "[MTN Syria – Company Information Page](#)" (in Arabic), Syrian Commission on Financial Markets and Securities, accessed 1 November 2025; "[MTN Syria: Administrative Restructuring Sparks Widespread Controversy](#)," Zaman al-Wasl, 25 April 2025; Zaman al-Wasl, "[Changes in the leadership of the telecommunications file...](#)" (in Arabic), Facebook post, 9 September 2025.

Qatarji Group (EU, UK, US sanctioned)	مجموعة قاطرجي الدولية	Qatarji Group is a conglomerate of companies active in multiple sectors, owned by Hussam Qatarji.	While Hussam Qatarji held negotiations with the transitional government, they are believed to have been unsuccessful in reaching a settlement. In January 2025 bank accounts belonging to the Qatarji Group in Syria were seized, with balances estimated at around SYP 300 billion (approximately USD 30 million). Progressively, assets belonging to the Qatarji Group in Syria were seized and placed under new management. However, the transitional government did not publicly declare exactly which companies and assets were seized. However, from Lebanon the Qatarji Group complained on its social media about “the theft” and auctioning of several companies and assets, including in agriculture, food warehouses, Golden Gate for Transport and Services, Asil Group for Investment, Qatarji Engineering and Mechanical Industry, Al-Rammal for Calcium Carbonate Production, and several hotels and livestock. Hussam Qatarji and his relatives still control significant assets and companies in Lebanon and the UAE. The exact nature and value of these assets are not known, but in Lebanon these include BS Company for Oil Services and several trading and investment companies.⁴⁵³
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453- “[Katerji Asset Seizures Highlight Names of New HTS Companies, Create Backlash Among Tribe](#),” The Syria Report (subscriber-only content), 25 March 2025 “[Liquidity Shortages Stir Confusion in the Banking Industry](#)”; Katerji Holding Group, [Profile Page](#), Facebook, accessed 1 November 2025; Katerji Holding Company, [Profile Page](#), Instagram, accessed 1 November 2025; Interview with a businessman familiar with negotiations between the Qatarji Group and the Economic Committee, June 2025.

Syriatel (EU, UK, and US delisted)	سيريتل	Telecommunications company formerly majority-owned by Rami Maklouf. While the company was formally placed under the management of Ahmad Al-Ali (chairman) and Murid al-Atassi (CEO) in 2021, it was suspected that the Assad family was the ultimate beneficial owner through Yassar Ibrahim and other frontmen.	Syriatel was reportedly placed under the control of the Economic Committee, as one of its members was appointed the company's legal guardian or authorized signatory. HTS-affiliated telecommunications companies formerly only active in northwest Syria—including Future Syria Network—merged with Syriatel. However, the company's restructuring otherwise remained limited to appointing a new CEO and board members to replace six executives accused of corruption. Mourid al-Atassi, executive director since June 2021, remained in his position. It is unclear what shareholders, if any, retained their stake in the company. In May 2025 Syriatel's annual report listed Ali Najib Trading Establishment (with its sanctioned owner) among companies still contracting with Syriatel.⁴⁵⁴
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454- Azhari and Dalatey, [“Syria Is Secretly Reshaping Its Economy. The President’s Brother Is in Charge”](#); [“Future Syria Network’ Merges into ‘Syriatel,’”](#) Enab Baladi, 9 July 2025; [“Exclusive: Syriatel Management Restructures Itself and Dismisses 6 Executives”](#) (in Arabic), Syria TV, 23 April 2025; [“Syriatel Mobile Telecom,”](#) Syrian Commission of Financial Markets and Securities, accessed 1 November 2025; [“Syriatel Annual Report 2025”](#) (in Arabic), Syriatel, 26 May 2025, accessed 1 November 2025; Interviews with a middleman liaising between businessmen and the Economic Committee, and interviews with businessmen in Damascus, May–June 2025.

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