

CLIENT ALERT

DECEMBER 19, 2025

U.S. Repeals the Caesar Act in Latest Move to Ease Syria Sanctions

On December 18, 2025, President Trump signed into law the National Defense Authorization Act for Fiscal Year 2026 (“NDAA 2026”). The NDAA 2026 specifies the budget, expenditures and policies of the U.S. Department of Defense for 2026. Section 6211 of the NDAA 2026 repeals the Caesar Syrian Civilian Protection Act of 2019 (“Caesar Act”). The Act was signed into law by President Trump in December 2019 and came into force on June 17, 2020. Following the repeal in the NDAA 2026, the Caesar Act, which sanctioned foreign persons who knowingly provided significant financial, material, or technological support to the Government of Syria, is no longer in force.

The repeal of the Caesar Act is the latest step taken by the U.S. Government to ease sanctions on Syria. The gradual removal of sanctions began with the issuance of [General License 24](#) in January 2025, followed by [General License 25](#) in May 2025, a [180-day suspension of the Caesar Act](#) in May 2025, the issuance of [Executive Order 14312](#) in June 2025 directing U.S. agencies to take measures to lift sanctions and export controls on Syria, and a second [180-day suspension of the Caesar Act](#) in November 2025.

While the U.S. no longer imposes the comprehensive sanctions on Syria set forth by the Caesar Act, certain Syrian actors, including former President Bashar Al-Assad, Captagon traffickers and persons linked to ISIS and Al-Qa’ida, remain subject to sanctions. Moreover, Syria is still designated a State Sponsor of Terrorism. State Sponsors of Terrorism are subject to restrictions on U.S. foreign assistance; a ban on defense exports and sales; certain controls over exports of dual-use items; and miscellaneous financial and other restrictions. The Secretary of State was ordered to review Syria’s designation as a State Sponsor of Terrorism in [Executive Order 14312](#), but no public action has been taken to date.

The repeal of the Caesar Act follows Syrian President Ahmed Al-Sharaa’s visit to Washington, DC on November 10, 2025, the first visit by a Syrian head of state to the White House since Syria gained independence in 1946. As reported in Curtis’ [June 12, 2025 Client Alert](#), the U.K. and E.U. have also taken steps to ease sanctions targeting Syria with the goal of promoting foreign investment and assisting in the recovery and rebuilding of Syria.

About Curtis

Curtis, Mallet-Prevost, Colt & Mosle LLP is a leading international law firm. Headquartered in New York, Curtis has 19 offices in the United States, Latin America, Europe, the Middle East and Asia. Curtis represents a wide range of clients, including multinational corporations and financial institutions, governments and state-owned

companies, money managers, sovereign wealth funds, family-owned businesses, individuals and entrepreneurs.

For more information about Curtis, please visit www.curtis.com.

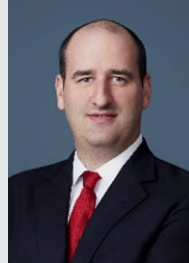
Attorney advertising. The material contained in this Client Alert is only a general review of the subjects covered and does not constitute legal advice. No legal or business decision should be based on its contents.

Please feel free to contact any of the persons listed below if you have any questions on this important development:



John Balouziyeh

Partner
jbalouziyeh@curtis.com
New York: +1 212 696 6065



Kevin Meehan

Partner
kmeehan@curtis.com
New York: +1 212 696 6197



Marwa Farag

Associate
mfarag@curtis.com
New York: +1 212 696 6040



Sara Dangón-Novoa

Associate
sdangon@curtis.com
New York: +1 212 696 6158