

Nos. 25-1083 AND 25-1084

IN THE
SUPREME COURT OF THE UNITED STATES

MARKWAYNE MULLIN, SECRETARY, DEPARTMENT OF
HOMELAND SECURITY, ET AL.,
PETITIONERS

v.

DAHLIA DOE, ET AL.
RESPONDENTS

DONALD J. TRUMP, PRESIDENT OF THE UNITED STATES,
ET AL.,
PETITIONERS

v.

FRITZ EMMANUEL LESLY MIOT, ET AL.,
RESPONDENTS

ON WRITS OF CERTIORARI BEFORE JUDGMENT
TO THE UNITED STATES COURTS OF APPEALS
FOR THE SECOND AND DISTRICT OF COLUMBIA CIRCUITS

**BRIEF AMICI CURIAE OF SYRIAN JUSTICE
AND ACCOUNTABILITY CENTRE AND
TAHRIR INSTITUTE FOR MIDDLE EAST POLICY
IN SUPPORT OF RESPONDENTS IN NO. 25-1083**

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STATEMENT OF INTEREST*

Pursuant to Supreme Court Rule 37, the Syria Justice and Accountability Centre (SJAC) and the Tahrir Institute for Middle East Policy (TIMEP) respectfully submit this brief amici curiae in support of Respondents Dahlia Doe, Sara Doe, Nesma Doe, Laila Doe, Waleed Doe, Mustafa Doe, and Ahmad Doe.

SJAC is a human rights organization working for meaningful justice and accountability in Syria with a goal of establishing a lasting peace. As part of its mission, over the last ten years SJAC has collected and documented violations of human rights and international humanitarian law in Syria with the aim of facilitating current and future transitional justice and accountability efforts. In fact, since the fall of the regime of Bashar Assad, SJAC has interviewed 435 witnesses who were victims of arbitrary detention, torture, disappearance, death under torture, extrajudicial executions, and sexual violence. SJAC is currently monitoring trial proceedings in Syria relating to events in 2025. SJAC also assists authorities in investigating and building cases for prosecution, uses forensic techniques to identify missing persons and mass graves, and creates justice policy initiatives.

*No counsel for a party authored this brief in whole or in part, and no counsel or party made a monetary contribution intended to fund the preparation or submission of the brief.

The Tahrir Institute for Middle East Policy (TIMEP) works to ensure that perspectives from the Middle East and North Africa are part of the policy discourse to foster transparent, accountable, and just societies. For more than twelve years, TIMEP has served as a leading policy voice on Syria, delivering expertise to decision-makers in the United States and across the world on Syria's political, security, economic, and justice profiles. It has informed the work of policymakers, serving as a bridge between them and Syrian scholars, researchers, civil society, and victim groups inside the country and in the diaspora. The institute has tracked and reported on country conditions, including the risks facing ethnic and religious minorities and the government's plans for economic recovery. It has also conducted in-depth studies of the country's laws and policies and monitored the situation in neighboring and host countries, positioning it to offer practical assessments on the factors impacting displacement and refugee return.

SUMMARY OF ARGUMENT

Over the past fourteen years, Syria has been ravaged by armed conflict. On March 29, 2012, the Secretary of the Department of Homeland Security (DHS) designated Syrian refugees in the United States for Temporary Protected Status (TPS) after finding that there were ongoing extraordinary and temporary conditions in Syria that prevented Syrian nationals from returning in safety. In 2013, the Secretary extended the TPS designation based on both extraordinary and temporary conditions and

ongoing armed conflict. DHS extended the Syria designation on several additional occasions. On September 19, 2025, DHS Secretary Kristi Noem terminated the designation, asserting that, after consulting with the Department of State, the fall of the regime of Bashar Assad had ended the armed conflict. She concluded that the previous conflict was followed by “local clashes” and ultimately “sporadic episodes of violence,” and that as result, Syrian refugees should return to Syria.

In reality, however, since the fall of the brutally repressive Assad regime in December 2024 Syria remains in a state of internal and international armed conflict and continues to suffer extraordinary and temporary conditions that preclude the safe, dignified and sustainable return of refugees.

First, the interim government has been unable to consolidate power since the beginning of the transition, giving rise to a security vacuum as armed groups continue to operate throughout the country. Hay’at Tahrir al-Sham (HTS), a group previously designated as an Al-Qaeda-linked terrorist organization, and other former opposition armed factions which committed grave human rights abuses and atrocities during the preceding fourteen-year armed conflict were integrated into the interim government as part of its newly-formed security apparatus. This has contributed to fear and mistrust, particularly among minority communities. Countless other armed factions also remain active in the country, committing unspeakable violence, including grave human rights abuses and atrocities. These groups include factions affiliated with interim

government forces, Bedouin, tribal and other irregular fighters allied with the government, pro-former government fighters (PFGF), the Suwayda Military Council and other Suwayda-based Druze armed groups, Kurdish-led Syrian Democratic Forces (SDF), the Türkiye-backed Syrian National Army (SNA), and terrorist groups including Islamic State of Iraq and the Levant (ISIL).

Second, since December 2024, the country continues to face widespread and continuous violence resulting in grave human rights violations and abuses. Two major waves of large-scale violence against civilians in the coastal, western and central regions of the country in March 2025 and in Suwayda since July 2025, resulted in over 3,100 deaths, villages burned to the ground, and the displacement of tens of thousands, disproportionately affecting minority Alawite and Druze communities. Despite a recent cease-fire agreement and an integration process, violence also continues to plague the northeast region of the country, where internal armed conflict among armed factions and the interim government disproportionately affects minority Kurdish communities and contributes to a worsening humanitarian crisis in the region. Beyond such conflicts, the country continues to witness other forms of violence targeting civilians, including abductions, arbitrary detention, enforced disappearance, torture, sexual and gender-based violence, and kidnappings. Israel has also engaged in periodic bombings, including in Damascus, as well as an expansion of its occupation of territory in Syria.

The United States Department of State has itself acknowledged the dangerous conditions in Syria. It maintains an active advisory against travel to Syria based on the risk of terrorism, unrest, kidnapping, hostage taking, crime, and armed conflict. The State Department warns that no part of Syria is safe from violence and that hostage-taking, terrorism, unexploded ordnance, and aerial bombardment pose significant risk of death or serious injury.

Third, the country remains gripped by dire humanitarian conditions, continuing violations of housing, land, and property rights, and an ongoing displacement crisis, which have all worsened in the face of continuing violence. Currently, 90% of Syrians live below the poverty line and about half the population struggles to access basic necessities, including adequate food and safe water. Years of conflict have devastated civilian infrastructure, including countless homes, entire villages, hospitals, schools, roads, water facilities, and electrical grids. Access to public services, including health care and education, as well as life-saving humanitarian aid, is severely limited. Millions of Syrians remain displaced throughout the country, with risks of durable demographic change. Meanwhile, remnants of war, including landmines and unexploded ordnance, continue to injure civilians, particularly children.

Since the fall of Assad, the situation in the country has remained extremely volatile. These conditions pose extreme danger to any returning Syrian TPS holders until the country is stabilized.

ARGUMENT

1. The conditions that gave rise to Temporary Protected Status (TPS) Designation for Syria.

Hafez Assad and his son and successor Bashar Assad presided over more than fifty years of brutal and repressive dictatorial rule in Syria.¹ Following public uprisings across Syria in March 2011, Bashar Assad engaged in a violent crackdown characterized by gross human rights violations,² which ultimately developed into an “entrenched armed conflict”³ lasting fourteen years, during which a range of gross human rights violations and crimes under international law were committed by the Syrian government. These included, *inter alia*, killings, chemical attacks, widespread torture and other ill-treatment, arbitrary detention, forced disappearance, extrajudicial executions, sexual and gender-based violence, forced displacement, and deliberate targeting of civilians and civilian infrastructure, such as hospitals, residential buildings, schools, and water

¹ Alice Autin, *Collective Efforts Essential for Justice in Syria*, Human Rights Watch (Dec. 8, 2025), <https://www.hrw.org/news/2025/12/08/collective-efforts-essential-for-justice-in-syria>.

² U.N. High Comm’r for Human Rights, *The Situation of Human Rights in the Syrian Arab Republic*, ¶¶ 33-91, U.N. Doc. A/HRC/18/53 (Sept. 15, 2011).

³ Human Rights Watch, *World Report 2013: Syria* (2013), <https://www.hrw.org/world-report/2013/country-chapters/syria>.

stations, including through sieges and bombardments.⁴

Serious abuses were also committed by government allies, armed groups opposing the government, terrorist groups, and the Kurdish-led *de facto* authorities and their allies, including, *inter alia*, arbitrary arrests and kidnappings, summary killings, unlawful and indiscriminate attacks, and torture.⁵

In 2021, the Office of the UN High Commissioner for Human Rights (OHCHR) compiled a list of 350,209 identified individuals killed in the conflict⁶ and the Independent International Commission of Inquiry on the Syrian Arab Republic (Syria COI) estimated that over 100,000 individuals

⁴ Special Procedures of the UN Human Rights Council, *Communication to the Syrian Arab Republic*, 1, Ref. No. AL SYR 1/2025 (Mar. 26, 2025), <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gId=29777> [hereinafter AL SYR 1/2025]; Autin, *supra* note 1; Amnesty International, *Syria: To Guarantee Atrocities don't Repeat* (May 16, 2025), <https://www.amnesty.org/fr/documents/MDE24/9210/2025/en/> [hereinafter *Guarantee Atrocities don't Repeat*].

⁵ Autin, *supra* note 1; *Guarantee Atrocities don't Repeat*, *supra* note 4.

⁶ Michelle Bachelet, U.N. High Comm'r for Human Rights, Oral Update to the Human Rights Council on the extent of conflict-related deaths in the Syrian Arab Republic (Sept. 24, 2021), <https://www.ohchr.org/en/statements-and-speeches/2021/09/oral-update-extent-conflict-related-deaths-syrian-arab-republic?LangID=E&NewsID=27531>.

had disappeared.⁷ As of the fall of the Assad regime in December 2024, the UN Refugee Agency (UNHCR) estimated that nearly 14 million people “remained displaced either inside Syria or in neighboring countries.”⁸

2. The post-conflict transition in Syria is characterized by a security vacuum and competition for control among the forces of the interim government and other armed factions who continue to be active throughout the country.

On 8 December 2024, Bashar Assad and his Government were “ousted from power . . . by a coalition of armed groups led by Hay’at Tahir al-Sham.”⁹ On January 29, 2025, Ahmed al-Sharaa was appointed interim President of Syria for a transition period of five years until a new constitution could be adopted and elections held.¹⁰ Al-Sharaa had previously served as the leader of Hay’at al-Sham

⁷ AL SYR 1/2025, *supra* 4 (citing Indep. Int’l Comm’n of Inquiry on the Syrian Arab Republic, ¶ 94, U.N. Doc. A/HRC/46/54 (Jan. 21, 2021)).

⁸ UNHCR, *A Year of Turmoil: Conflicts, Crises and Displacement in 2024* (Dec. 26, 2024), <https://www.unhcr.org/news/stories/year-turmoil-conflicts-crises-and-displacement-2024>.

⁹ Indep. Int’l Comm’n of Inquiry on the Syrian Arab Republic, *Summary*, U.N. Doc. A/HRC/58/66 (Mar. 19, 2025) [hereinafter Syria COI 2025 Report].

¹⁰ *Id.* at ¶13.

(HTS),¹¹ which was formerly designated as a terrorist organization by the U.S. Department of State¹² (until 8 July 2025)¹³ and UN Security Council (until February 2026).¹⁴

The HTS-led Military Operations Command announced “the repeal of the 2012 Constitution of the Syrian Arab Republic, the dissolution of the parliament, the disbandment of the former Government’s military and security forces and the dissolution of the Baath Party.”¹⁵ Subsequently,

¹¹ See Mackenzie Holtz, *Examining Extremism: Hayat Tahrir Al-Sham (HTS)*, Center for Strategic and International Studies (Aug. 3, 2023), <https://www.csis.org/blogs/examining-extremism/examining-extremism-hayat-tahrir-al-sham-hts>.

¹² U.S. Dept. of State, Press Statement, Terrorist Designations of the al-Nusrah Front as an Alias for al-Qa’ida in Iraq (Dec. 11, 2012), <https://2009-2017.state.gov/r/pa/prs/ps/2012/12/201759.htm>; Media Note, U.S. Dept. of State, Amendments to the Terrorist Designations of al-Nusrah Front (May 31, 2018), <https://2017-2021.state.gov/amendments-to-the-terrorist-designations-of-al-nusrah-front/>.

¹³ U.S. Dept. of State, Press Statement, Revoking the Foreign Terrorist Organization Designation of Hay’at Tahrir al-Sham (July 7, 2025), <https://www.state.gov/releases/office-of-the-spokesperson/2025/07/revoking-the-foreign-terrorist-organization-designation-of-hayat-tahrir-al-sham>.

¹⁴ UN Security Council, Press Release, Security Council ISIL (Da’esh) and Al-Qaida Sanctions Committee Removes One Entry from Its Sanctions List, U.N. Press Release SC/16306 (Feb. 28, 2026), <https://press.un.org/en/2026/sc16306.doc.htm>.

¹⁵ Syria COI 2025 Report, *supra* note 9, at ¶13.

President al-Sharaa signed a constitutional declaration on March 13, 2025.¹⁶ A new government was ultimately “announced with key portfolios composed of former [HTS] leadership.”¹⁷ These efforts were met with objections by the *de facto* authorities in the northeast and some leaders in Suwayda, among others, claiming that the new government and the declaration were “not reflective of the aspirations of Syria's multi-ethnic and multi-religious population” and expressing “concern[s] about the consolidation of power within the executive with limited institutional oversight.”¹⁸

To fill the security vacuum left by the dissolution of the former government’s Syrian Arab Army and multiple security agencies, former HTS leaders were also appointed to lead the Ministries of Defense and Interior.¹⁹ Additionally, “dozens of former opposition armed factions . . . agreed to integrate into a newly unified army under the

¹⁶ Human Rights Watch, *Syria: Constitutional Declaration Risks Endangering Rights* (Mar. 25, 2025), <https://www.hrw.org/news/2025/03/25/syria-constitutional-declaration-risks-endangering-rights>.

¹⁷ Indep. Int’l Comm’n of Inquiry on the Syrian Arab Republic, ¶10, U.N. Doc. A/HRC/61/62 (Mar. 12, 2026) [hereinafter Syria COI 2026 Report].

¹⁸ *Id.*

¹⁹ *Id.* at ¶ 16; Indep. Int’l Comm’n of Inquiry on the Syrian Arab Republic, ¶19, U.N. Doc. A/HRC/59/CRP.4 (Aug. 11, 2025) [hereinafter Syria COI Alawi Report].

[Ministry of Defense].”²⁰ However, in the absence of “human rights vetting,” entire former opposition factions and their leadership, including HTS, the Türkiye-backed Syrian National Army, and the National Liberation Front, as well as terrorist groups and foreign fighters, were integrated, despite their well-documented history of committing grave human rights violations and atrocities and being subjected to sanctions for human rights abuses.²¹ Despite their formal integration, such factions’ reporting lines remained “largely intact” as they operated “in practice . . . with a degree of autonomy”²² Similarly, under the Ministry of Interior, a new “General Security” force, known as “Internal Security Forces (ISF)” was formed, with former HTS and other opposition armed group members integrated, “also without prior human rights vetting.”²³

Ultimately, while the interim government has promised to “ensure that no armed factions would operate outside of the state,”²⁴ the reality over the past sixteen months has been starkly different,

²⁰ Syria COI 2026 Report, *supra* note 17, at ¶17.

²¹ *Id.*; Special Procedures of the UN Human Rights Council, *Communication to the Syrian Arab Republic*, 1-2, Ref. No. AL SYR 6/2025 (Aug. 26, 2025), <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gId=30242> [hereinafter AL SYR 6/2025]

²² Syria COI 2026 Report, *supra* note 17, at ¶17.

²³ *Id.* at ¶18.

²⁴ *Id.* at ¶20.

characterized by continued presence and operations by groups not absorbed by the state, including factions of Kurdish-led Syrian Democratic Forces (SDF), Türkiye-backed Syrian National Army (SNA), ISIL, and other terrorist groups, Druze and Bedouin armed factions, pro-former government fighters (PFGFs), and other unaffiliated groups. Israel has also engaged in armed intervention in Syria.

Some former members of the Syrian Arab Army under Assad “joined new armed groups consisting of pro-former government forces (PFGFs) or so-called ‘remnants of the regime.’” These forces, “comprised of thousands of fighters,” are described as “loyal to the previous regime and its former senior commanders,” and therefore refuse to hand over weapons or settle their status.²⁵ Since the fall of the former government, these groups have conducted continuous operations throughout the country's coastal areas, including Latakia, Homs, and Hama, against General Security forces or Internal Security Forces.²⁶

In the Druze-majority southern governate of Suwayda, the Suwayda Military Council—“an armed coalition established in February 2025 in the Druze-majority Suwayda Governorate following the fall of the Assad government”—and other Suwayda-based armed groups also exist outside the state security

²⁵ Syria COI Alawi Report, *supra* note 19, at ¶16, n.16.

²⁶ Syria COI 2026 Report, *supra* note 17, at ¶ 20; Syria COI Alawi Report, *supra* note 19, at ¶¶ 24-27, 49-59.

apparatus.²⁷ As the interim government sought to integrate all groups and unify all Syrian territories under its control, tensions mounted between the government and “influential local actors in Suwayda due to mistrust of the new authorities as well as fears of political marginalization.”²⁸ Suwayda had enjoyed a “level of self-governance in the years prior” to the fall of the former government and as a result “some Druze leaders were reluctant to disarm or fully accept state security deployment in the governorate,” but rather “sought to maintain a certain level of autonomy.”²⁹ Such leaders distrusted the government’s intentions, particularly in light of their past as members of a former terrorist organization and the resulting implications for religious minorities.³⁰ Additionally, pro-government Bedouin or tribal forces exist in counterpoint to the Druze in Suwayda. Those forces have worked with the Internal Security Forces, including in running checkpoints in the governorate.³¹

²⁷ Indep. Int’l Comm’n of Inquiry on the Syrian Arab Republic, ¶32, U.N. Doc. A/HRC/61/CRP.7 (March 27, 2026) [hereinafter Syria COI Druze Report]; Syria COI 2026 Report, *supra* note 17, at ¶ 20; Human Rights Watch, *World Report 2026: Syria* (2026), <https://www.hrw.org/world-report/2026/country-chapters/syria> [hereinafter HRW World Report 2026].

²⁸ Syria COI Druze Report, *supra* note 27, ¶12.

²⁹ *Id.* at ¶¶12-14.

³⁰ *Id.* at ¶15.

³¹ *Id.* at ¶¶12, 24, 26, 29-32.

After the fall of Assad, Kurdish-led Syrian Democratic Forces (SDF) continued to control and administer much of northeast Syria, despite its initial agreement to integrate into the Syrian army.³² However, as of January 2026, “SDF’s territorial footprint has contracted significantly”³³ in the aftermath of recent hostilities. On January 30, 2026, the SDF once again agreed to integrate into the Syrian army; however, the progress and ultimate implementation of the integration remains unclear, as does control over areas in the northeast.³⁴ Moreover, Türkiye-backed Syrian National Army (SNA) factions “continue to detain, mistreat and extort civilians in northern Syria,” particularly Kurdish civilians³⁵ and are being integrated into Syria’s armed forces.³⁶

³² HRW World Report 2026, *supra* note 27; Syria COI 2026 Report, *supra* note 17, at ¶¶ 21, 23.

³³ Özge Genç, *How Damascus Reclaimed Syria’s Northeast, and What Integration Now Means*, Middle East Council on Global Affairs (Feb. 4, 2026), https://mecouncil.org/blog_posts/syria-sdf-integration-agreement-2026-analysis/.

³⁴ HRW World Report 2026, *supra* note 27.

³⁵ See Human Rights Watch, *Northeast Syria: Apparent War Crime by Türkiye-Backed Forces* (Jan. 30, 2025), <https://www.hrw.org/news/2025/01/30/northeast-syria-apparent-war-crime-turkiye-backed-forces> [hereinafter *Northeast Syria*].

³⁶ Human Rights Watch, *Syria: Türkiye-backed Armed Groups Detain, Extort Civilians* (May 14, 2025), <https://www.hrw.org/news/2025/05/14/syria-turkiye-backed-armed-groups-detain-extort-civilians> [hereinafter *Türkiye-backed Armed Groups*].

Additionally, terrorist groups such as Islamic State of Iraq and the Levant (ISIL), Saraya Ansar al Sunna, Turkistan Islamic Party and Firqat al-Ghuraba remain a serious threat in Syria.³⁷

Since December 8, 2024, Israel has “consolidate[d] and expand[ed] its occupation of the Syrian Golan” by taking “control of further Syrian territory east of the occupied Golan” and establishing a military presence.³⁸

Unaffiliated groups also pose a threat to the government’s goal of ensuring no armed factions operate outside the aegis of the state, engaging in hostilities alongside the above identified groups as well as the interim government, taking up arms spontaneously and conducting revenge killings, and contributing to other forms of violence plaguing the transitional period, including targeted abductions, kidnappings, arbitrary detentions and enforced disappearances.³⁹

³⁷ Syria COI 2026 Report, *supra* note 17, at ¶ 22. *See also* United Nations, *Security Council hears of persistent and evolving Da’esh threat*, UN NEWS (Feb. 10, 2025), <https://news.un.org/en/story/2025/02/1159966>.

³⁸ Special Comm. to Investigate Israeli Practices Affecting the Human Rights of the Palestinian People and Other Arabs of the Occupied Territories, ¶¶ 36-37, 64, U.N. Doc. A/80/365 (Sept. 5, 2025).

³⁹ *See* Syria COI Alawi Report, *supra* note 19, at ¶ 61; Syria COI 2026 Report, *supra* note 17, at ¶ 71.

In short, interim government forces are “operat[ing] alongside a diverse range of armed actors with varying degrees of alignment and autonomy.”⁴⁰ Continued internal armed conflicts involving the SDF and former SNA factions, ISIL, Druze armed factions in Suwayda and PFGFs along the coast as well as the expansion of Israel’s occupation of territory in Syria and the “related international armed conflict,” illustrate “the limits of central authority” by the interim government.⁴¹ As a result, by early 2026, parts of the country, including large parts of Suwayda governorate, Al-Hasakah governorate in the northeast, and territory controlled by Israel, remain outside the interim government’s control.⁴² Ultimately, the continued presence and operations by such groups illustrate the true fragility and volatility of the transition in Syria.

3. Syria remains a country plagued by widespread and ongoing internal and international armed conflict and violence.

Since December 2024, Syria has experienced multiple waves of large-scale violence against civilians. The most significant were in coastal, western and central areas in March 2025 and in Suwayda in July 2025. Syria has also seen ongoing and continuous internal armed conflict involving

⁴⁰ Syria COI 2026 Report, *supra* note 17, at ¶23.

⁴¹ *Id.* at ¶ 80.

⁴² *Id.* at ¶ 23.

various armed factions throughout the country, including interim government forces, SDF, SNA factions, ISIL, Druze armed factions, and PFGFs; hostilities between government factions and SDF in the northeast in January 2026; terrorism-related attacks and violence; ongoing patterns of revenge attacks and targeted killings, kidnappings, abductions, arbitrary detentions, enforced disappearances, other forms of detention-related violations, torture, and sexual and gender-based violence by a range of actors. These conditions go beyond “local clashes” and “sporadic episodes of violence” and rather illustrate widespread and continuous violence and armed conflict which preclude the possibility for safe return of Syrian TPS holders.

Since early 2025, a climate of retributive and retaliatory violence and mounting sectarian tensions threatened the overall security landscape in the country. Violent actors ranging from terrorist groups such as ISIL to “rogue local groups” carried out revenge attacks and assassinations amongst rising hate speech and “derogatory sectarian threats against Alawis,” stoking high levels of fear and insecurity amongst affected Alawi communities, amongst other minorities.⁴³ The UN Independent International Commission of Inquiry on the Syrian Arab Republic

⁴³ *Id.*; Syria COI Alawi Report, *supra* note 19, at ¶¶ 29-30, 38-40, 62-63, 101; Human Rights Watch, Syrian Archive, Syrians for Truth & Justice, “*Are you Alawi? Identity-Based Killings During Syria’s Transition, Summary*” (Sept. 23, 2025), <https://www.hrw.org/report/2025/09/23/are-you-alawi/identity-based-killings-during-syrias-transition>.

(Syria COI) has documented such revenge attacks across several governorates since late January 2025, including killings in the villages of Fahil and Maryameen, Anz and Arzeh in Hama and Homs.⁴⁴ The COI explained how “[m]en who had reportedly handed over their weapons through the . . . disarmament process were ill-treated and executed” in the absence of State protection.⁴⁵ Against this background, Syria witnessed repeated large-scale violence targeting minority communities in both the coastal and western-central regions as well as in the Suwayda governorate, contributing to a “climate of fear and insecurity amongst many Syrians throughout the country.”⁴⁶

January 2025. In January 2025, the interim government “deployed security forces in the coastal area of Latakia and Tartus, an area predominantly inhabited by Alawite people and a stronghold of the remnants of the Assad regime.”⁴⁷ Violations in the

⁴⁴ Paulo Pinheiro, Chair of the Syria COI, Oral Update to the Human Rights Council (Jun. 27, 2025), <https://www.ohchr.org/en/statements-and-speeches/2025/06/oral-update-mr-paulo-sergio-pinheiro-chair-independent>.

⁴⁵ *Id.*

⁴⁶ Syria COI Alawi Report, *supra* note 19, at ¶1.

⁴⁷ Special Procedures of the UN Human Rights Council, *Communication to the Syrian Arab Republic*, 2, Ref. No. UA SYR 2/2025 (Mar. 27, 2025), <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gId=29798> [hereinafter UA SYR 2/2025].

context of “combing” operations, including summary killings, were widely reported by human rights civil society organizations.⁴⁸ In one instance on January 23, 2025, security forces conducted a combing campaign in Fahel and Mreimin villages, detaining, beating, torturing and killing residents, raiding the villages, and looting homes. Killings were also reported in the nearby villages of Kherbet Elhamam, Al Ghazila, Kherbet Al Tin and Al Qabu and reports by local groups also point to several instances of arbitrary detention across north-west rural Homs.⁴⁹

March 2025. With tensions mounting, a series of events beginning in March 2025 in Syria’s coastal region quickly ignited a widespread conflagration. An attack by pro-former government forces (PFGFs) against interim government forces in Hama, Latakia, and Tartous governorates sparked “a wave of identity-based violence across the region.”⁵⁰ Interim government forces, affiliated armed groups, and unidentified armed individuals “swept through Alawi-majority areas of Tartous, Latakia and Hama,” in a “centrally coordinated military operation” aimed at targeting former remnants of the Assad regime.⁵¹

⁴⁸ Human Rights Watch, *Syria: End Coastal Killing Spree, Protect Civilians* (Mar. 10, 2025), <https://www.hrw.org/news/2025/03/10/syria-end-coastal-killing-spree-protect-civilians>.

⁴⁹ Syria COI Alawi Report, *supra* note 19, at ¶¶41-45.

⁵⁰ *Id.* at ¶¶ 48-59; HRW World Report 2026, *supra* note 27.

⁵¹ *Id.*

These armed actors not only engaged in a fight against PFGF combatants, “but also targeted civilians belonging to religious minorities, particularly Alawites but also Shia Muslims, among others,”⁵² committing large-scale summary executions, torture, kidnapping and enforced disappearance, abuse of detainees, deliberate destruction of property and forced displacement.⁵³ Armed groups “went door to door,” looting and burning homes and executing entire families in their homes or in public executions, including children, women and older persons.⁵⁴ These attacks were carried out “on a sectarian basis” as perpetrators consistently asked civilians whether they were Sunni or Alawi.⁵⁵

⁵² UA SYR 2/2025, *supra* note 47, at 2.

⁵³ *Id.*; HRW World Report 2026, *supra* note 27; Paulo Pinheiro, Chair of the Syria COI, Oral Update to the UN General Assembly’s Third Committee (Oct. 30, 2025), <https://www.ohchr.org/en/statements-and-speeches/2025/10/statement-paulo-pinheiro-chair-independent-international-commission>; OHCHR, *Syria: Distressing scale of violence in coastal areas* (Mar. 11, 2025), <https://www.ohchr.org/en/press-briefing-notes/2025/03/syria-distressing-scale-violence-coastal-areas> [hereinafter *Distressing scale*].

⁵⁴ UA SYR 2/2025, *supra* note 47, at 2; *Are you Alawi?*, *supra* note 43; *Distressing scale*, *supra* note 53.

⁵⁵ Syria COI Alawi Report, *supra* note 19, at ¶73; *Are you Alawi?*, *supra* note 43; *Distressing scale*, *supra* note 53.

In total at least 1,426 people were killed in the coastal regions, mostly civilians.⁵⁶ Tens of thousands of Alawis were displaced from their homes and villages in Latakia, Tartus, Homs and Hama, of whom over 40,000 fled into Lebanon.⁵⁷ Thousands more sought refuge at a Russian air base.⁵⁸ While interim authorities announced “the end of security operations in the coastal areas on 10 March,”⁵⁹ in reality, PFGFs “continued operations throughout 2025 in the coastal areas.”⁶⁰

April and May 2025. In the wake of the grave violence committed against the Alawis, sectarian violence also began to take hold in the Suwayda governate against the Druze community. Mounting sectarian tensions between the Druze and Bedouins and tribal forces in the southern region, clashes targeting the Druze community in Jaraman, Achrafiyeh-Sahnaya in Rural Damascus and Sura al-Kabira in April and May 2025, and a series of kidnappings, clashes and assaults on Druze property

⁵⁶ Syria COI Alawi Report, *supra* note 19, at ¶1, n.1 (*citing* the findings of the National Inquiry on the March Coastal Events).

⁵⁷ Pinheiro, *supra* note 43.

⁵⁸ Khalil Ashawi & Mahmoud Hasano, *Syrians trickle home from sanctuary at Russian air base*, Reuters (Mar. 14, 2025), <https://www.reuters.com/world/middle-east/syrians-trickle-home-sanctuary-russian-air-base-2025-03-14/>.

⁵⁹ *Distressing scale*, *supra* note 53.

⁶⁰ Syria COI 2026 Report, *supra* note 17, at ¶20.

in early July 2025⁶¹ set the stage for the ensuing violence.

July 2025 to present. The events in Suwayda in July 2025 illustrate how even a single act of violence can lead to widespread armed conflict in today's Syria. On July 11, 2025, a Druze merchant was abducted at an Internal Security Forces checkpoint staffed by members of Bedouin and tribal forces.⁶² In the days that followed, Druze and Bedouin fighters carried out reciprocal abductions of several men.⁶³ As violence erupted between Druze armed forces and pro-government Bedouin fighters, the interim authorities "announced a formal intervention to restore order." The government forces included a combination of regular forces and affiliated Bedouin and tribal fighters. They ended up "encounter[ing] armed resistance from Suwayda Military Council and other Suwayda-based armed groups (SMCAGs)).⁶⁴ After government forces and accompanying Bedouin and tribal fighters entered Suwayda city, widespread attacks on civilians began, including pervasive "murders, direct and indiscriminate attacks, arbitrary arrests and abductions, torture and ill-treatment, pillage, attacks on civilian property, sexual and gender-based violence, including rape and outrages upon personal dignity," such as the cutting

⁶¹ Syria COI Druze Report, *supra* note 27, ¶¶ 21-22, 25.

⁶² *Id.* at ¶¶ 24, 26.

⁶³ *Id.* at ¶ 26.

⁶⁴ *Id.* at ¶¶ 29-30, 32.

of moustaches of elderly Druze men, a deeply offensive and humiliating act, “and attacks on buildings dedicated to religion, accompanied by discriminatory sectarian insults aimed primarily at the Druze community.”⁶⁵

Government forces then withdrew under a cease-fire; but in the wake of that withdrawal, SMCAGs launched a second wave of violence against Bedouin civilians.⁶⁶ Specifically, SMCAGs “engaged in murder, direct and indiscriminate attacks on civilians, torture and ill-treatment, arbitrary detention, forced displacement, outrages upon personal dignity, attacks on buildings dedicated to religion and pillage directed at the Bedouin community.”⁶⁷

Reports of that violence against the Bedouins, alongside mounting hate speech and disinformation targeting the Druze, in turn led to the mobilization of thousands of tribal fighters alongside fighters

⁶⁵ *Id.* at ¶37. *See also* Special Procedures of the UN Human Rights Council, *Communication to the Syrian Arab Republic*, Ref. No. AL SYR 7/2025 (Aug. 12, 2025), <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gId=30247>; Press Release, OHCHR, *Türk calls for immediate steps to ensure protection of people in Suweida and across Syria* (July 18, 2025), <https://www.ohchr.org/en/press-releases/2025/07/turk-calls-immediate-steps-ensure-protection-people-suweida-and-across-syria>.

⁶⁶ Syria COI Druze Report, *supra* note 27, at ¶41.

⁶⁷ *Id.*

affiliated with the interim government forces. During this wave of the conflict, tribal fighters engaged in targeted killings, arbitrary detention, outrages on personal dignity, pillage, including through the widespread looting and systematic burning of homes in mixed or predominantly Druze villages, attacks on civilian objects, and attacks on religious buildings.⁶⁸

The July incidents resulted in a conservative estimate of 1,700 people killed, the vast majority of which were members of the Druze community, with hundreds of Bedouins and government forces also killed.⁶⁹ Nearly 200,000 people were displaced.⁷⁰ In interviews conducted by the Syria COI with internally displaced persons from Druze and Bedouin communities, individuals from both communities expressed continuing fear of violence and indicated that they “do not feel safe to return to their villages which are currently under the control of government and Druze armed groups respectively.”⁷¹

The armed conflict in Suwayda continues to the present.⁷² For example, in mid-March 2026, fighting broke out between government forces and fighters from local tribes against opposing Druze factions in

⁶⁸ *Id.* at ¶¶ 42-44.

⁶⁹ *Id.* at ¶ 48.

⁷⁰ *Id.*

⁷¹ *Id.* at ¶ 55.

⁷² *Id.* at ¶2.

the western countryside of Suwayda. Mortar shells fell on areas under the control of Druze factions. The shelling later hit residential neighborhoods in the city of Suwayda.⁷³

Efforts to hold offenders liable for both waves of violence have been minimal and ineffectual. The interim authorities established a National Inquiry on the March Coastal Events, which presented its findings on July 22, 2025,⁷⁴ and a National Inquiry on the July Suwayda violence, which presented its findings on March 17, 2026.⁷⁵ With respect to coastal violence, authorities shared assurances during a press conference that it would hold some 400 fighters accountable. To date, however, only one case has been pursued, commencing in Aleppo on November 18, 2025, with only 14 defendants⁷⁶--low-level soldiers, seven of whom are affiliated with the former government, and seven of whom are affiliated with the interim government. SJAC is monitoring that trial and has found it to be cursory in nature, also

⁷³ Al Jazeera, *Israel says it hit Syrian army camps in the south after Druze 'attacked'* (Mar. 20, 2026), <https://www.aljazeera.com/news/2026/3/20/israel-says-it-hit-syrian-army-camps-in-the-south-after-druze-attacked>.

⁷⁴ Syria COI 2026 Report, *supra* note 17, at ¶28.

⁷⁵ Syria COI Druze Report, *supra* note 27, at ¶138.

⁷⁶ See Amnesty International, *Syria: A year after Assad's fall, the rights of survivors and families must guide transition* (Dec. 8, 2025), <https://www.amnesty.org/en/latest/news/2025/12/syria-a-year-after-assads-fall-rights-of-survivors-must-guide-transition/>.

noting that the court and justice sectors lack the capacity to truly hold perpetrators accountable.⁷⁷ Ultimately, the failure to hold senior military or civilian leaders accountable will only continue to promote a culture of impunity.⁷⁸

While the context and triggers of the escalations in March and July 2025 were different, “they all ignited sectarian strife and deepened mistrust in the authorities’ ability to protect all Syrians and unify the country during the transitional period” as well as end the cycle of impunity and hold perpetrators to account, “rais[ing] grave concerns that the stage is set for further violence unless swift action is taken.”⁷⁹ A member of a Syrian-led civil society organization noted that, “[t]his is not about a single week in March” or July; rather, “[i]t is an indicator of a broader pattern that needs to be addressed.”⁸⁰ Specifically, the horrific violence against minority communities is “another grim reminder of the deadly consequences of impunity for sectarian-based killings

⁷⁷ See SJAC, *Inside the Coastal Incidents Trial – Assad Regime’s Affiliates #1: All Eyes on Me* (Jan. 28, 2026), <https://syriaaccountability.org/inside-the-coastal-incidents-trial-1-all-eyes-on-me/>.

⁷⁸ See HRW World Report 2026, *supra* note 27.

⁷⁹ Syria COI Druze Report, *supra* note 27, at ¶22; Pinheiro, *supra* note 52.

⁸⁰ Human Rights Watch, *Syria: March Atrocities Demand Senior Level Accountability* (Sept. 23, 2025), <https://www.hrw.org/news/2025/09/23/syria-march-atrocities-demand-senior-level-accountability>.

in Syria, which has emboldened government and affiliated forces to kill without fear of accountability.”⁸¹

January 2026. As the interim government sought to gain control over all Syrian territory, hostilities escalated in northeastern Syria in early January 2026 between interim authorities and Kurdish-led Syrian Democratic Forces (SDF), contributing to a wider deterioration of the security environment in the northern region and country overall. On January 6, 2026, Syrian interim government forces and SDF began fighting in two predominantly Kurdish neighborhoods in Aleppo.⁸² A wider military confrontation began on January 17 as Syrian government forces gained control of Raqqa and Deir ez-Zor and moved towards areas in al-Hasakah governorate. Although the parties agreed to stop hostilities the following day, the state of the ceasefire has remained precarious.⁸³ The UN Office for the Coordination of Humanitarian Affairs (OCHA) has

⁸¹ Amnesty International, *Syria: New investigation reveals evidence government and affiliated forces extrajudicially executed dozens of Druze people in Suwayda* (Sept. 2, 2025), <https://www.amnesty.org/en/latest/news/2025/09/syria-new-investigation-reveals-evidence-government-and-affiliated-forces-extrajudicially-executed-dozens-of-druze-people-in-suwayda/>.

⁸² Human Rights Watch, *Syria: Civilian Protection Lacking in Northeast Escalation* (Jan. 25, 2026), <https://www.hrw.org/news/2026/01/25/syria-civilian-protection-lacking-in-northeast-escalation>.

⁸³ *Id.*

reported that “the overall environment remained unpredictable in February [2026]”.⁸⁴ UN experts have “condemned shocking alleged violations” by parties to the hostilities, “including reports of summary executions, attacks on civilians, torture and the desecration of bodies and graves” as well as “reports of insecurity, violence, and breakouts at detention facilities, including escapes by alleged ISIL members.”⁸⁵

Disruptions to water electricity, essential infrastructure and humanitarian aid further compounded the precarious context.⁸⁶ Over 190,000 individuals, mainly women and children, from Aleppo, Al-Hassakeh, and ArRaqqa governorates have been displaced since early January.⁸⁷ Moreover, hostilities between SDF and former SNA factions,

⁸⁴ OCHA, *Syrian Arab Republic: Humanitarian Overview Issue No. 4* (Mar. 16, 2026), <https://www.unocha.org/publications/report/syrian-arab-republic/syrian-arab-republic-humanitarian-overview-issue-no-4-january-february-2026> [hereinafter *Humanitarian Overview Issue No. 4*].

⁸⁵ Press Release, OHCHR, UN experts urge restoration of peace, human rights and security in North-East Syria (Jan. 29, 2026), <https://www.ohchr.org/en/press-releases/2026/01/un-experts-urge-restoration-peace-human-rights-and-security-north-east-syria>.

⁸⁶ *Humanitarian Overview Issue No. 4*, *supra* note 84.

⁸⁷ UNHCR, *Situation in northeast Syria: Flash Update* (Jan. 31, 2026), <https://www.unhcr.org/sites/default/files/2026-02/unhcr-northeast-syria-situation-flash-update.pdf>.

backed by Turkish forces, have continued in the north and northeast since late 2024, as indirect and remote fire attacks by both sides have resulted in civilian deaths, casualties and displacement.⁸⁸ Attacks have also damaged civilian infrastructure, affecting access to electricity and water.⁸⁹ Ultimately, Human Rights Watch has found that “[t]he SNA and Turkish forces have demonstrated a clear and troubling pattern of unlawful attacks against civilians and civilian objects.”⁹⁰

Israeli Defense Forces have launched air strikes across Syria since December 8, 2024, including “over 1000 reported airstrikes as well as ground operations in southern governorates, resulting in “civilian casualties, population displacement, property damage and destruction, arbitrary detention, transfer of detainees and restrictions on fundamental freedoms.”⁹¹ During the hostilities in Suwayda, Israel conducted several “airstrikes on locations in Damascus and rural Damascus between 30 April and 3 May [2025]” and a “series of airstrikes across southern Syria” as well as on the Ministry of Defense’s General Staff complex in Damascus in mid-July 2025, causing significant casualties amongst

⁸⁸ Syria COI 2026 Report, *supra* note 17, at ¶¶ 90-92.

⁸⁹ *Id.* at ¶ 92.

⁹⁰ *Northeast Syria*, *supra* note 35.

⁹¹ Syria COI 2026 Report, *supra* note 17, at ¶¶ 82, 111-129

government forces.⁹² These Israeli actions have been characterized as an international armed conflict.⁹³

Beyond such instances of internal and international armed conflict, other forms of violence, including abductions, arbitrary detentions, enforced disappearances and other detention-related violations; sexual and gender-based violence against women from minority communities; recruitment of child soldiers; and torture and ill-treatment have been carried out by security forces of the interim authorities, groups affiliated with them, elements associated with the former government, local armed groups and unidentified armed individuals.⁹⁴

Since December 2024, there have been several reports of enforced disappearance of persons belonging to minority communities, namely Alawis.⁹⁵ Alawi women and girls have been disproportionately affected by patterns of targeted abductions, enforced disappearances and other forms of gender-based violence carried out by unidentified armed actors as well as organized crime groups or individual

⁹² Syria COI Druze Report, *supra* note 27, at ¶¶ 22, 38, 48.

⁹³ Syria COI 2026 Report, *supra* note 17, at ¶ 80.

⁹⁴ See OHCHR, *Syria: One year since regime change, more should be done to stop violations, achieve justice* (Dec. 5, 2025), <https://www.ohchr.org/en/press-briefing-notes/2025/12/syria-one-year-regime-change-more-should-be-done-stop-violations>.

⁹⁵ Working Group on Enforced or Involuntary Disappearances, *Enforced or involuntary disappearance*, ¶87, U.N. Doc. A/HRC/60/35 (July 21, 2025).

criminals. UN experts noted that “the recent pattern observed seems to indicate a specific and systematic targeting of Alawite women and girls” in “multiple locations across Syria.”⁹⁶ In one case, “perpetrators were identified as foreign fighters nominally integrated with government forces under the [Ministry of Defense].”⁹⁷ In some cases, abductees were subjected to sexual violence, including gang rapes, child and forced marriages.⁹⁸ During July 2025 hostilities, Druze and Bedouin women were also taken hostage, detained or abducted by armed actors, including tribal fighters and ISF personnel.⁹⁹ The Syria COI and UN experts have also noted concerns regarding “the treatment of victims upon release, particularly by the General Security” forces.¹⁰⁰ The Syria COI has reported that in two cases it

⁹⁶ Special Procedures of the UN Human Rights Council, *Communication to the Syrian Arab Republic*, 2, Ref. No. AL SYR 5/2025 (July 15, 2025), <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gId=30176> [hereinafter AL SYR 5/2025].

⁹⁷ Syria COI 2026 Report, *supra* note 17, at ¶ 71.

⁹⁸ *Id.* at ¶ 73; AL SYR 5/2025, *supra* note 95, at 2. *See also* Amnesty International, *Syria: Authorities must investigate abductions of Alawite women and girls* (July 28, 2025), <https://www.amnesty.org/en/latest/news/2025/07/syria-authorities-must-investigate-abductions-of-alawite-women-and-girls/> [hereinafter *Authorities must investigate*].

⁹⁹ Syria COI 2026 Report, *supra* note 17, at ¶ 79.

¹⁰⁰ Syria COI 2026 Report, *supra* note 17, at ¶74; AL SYR 5/2025, *supra* note 95, at 3.

investigated “after government forces secured the release of victims, the victims themselves were subsequently arrested and investigated for morality-related crimes.”¹⁰¹ This case illustrates a broader pattern of challenges faced by families of missing persons when engaging with both the police and the General Security forces.¹⁰² Amnesty International has explained that “[t]he authorities in Syria have repeatedly promised to build a Syria for all Syrians, yet they are failing to stop abductions and kidnappings of women and girls, to prevent physical abuse, forced marriage and . . . to effectively investigate and to prosecute those responsible.”¹⁰³

Additionally, detention-related violations have been committed by several actors across Syrian territory. In the northeast, for example, SDF have committed detention-related violations, including arbitrary detention, incommunicado detention, deaths in custody and enforced disappearance. They have also been reported to engage in child recruitment.¹⁰⁴ Additionally, according to Human Rights Watch, “hundreds remain detained in SNA-run, Turkish-supervised prisons.”¹⁰⁵ Moreover, detention-related violations were perpetrated by

¹⁰¹ Syria COI 2026 Report, *supra* note 17, at ¶74.

¹⁰² AL SYR 5/2025, *supra* note 91, at 4.

¹⁰³ *Authorities must investigate*, *supra* note 97.

¹⁰⁴ Syria COI 2026 Report, *supra* note 17, at ¶¶ 94, 99.

¹⁰⁵ *Türkiye-backed Armed Groups*, *supra* note 36.

interim security forces against Alawi men and boys in the context of "combing" operations across Latakia, Tartus, Homs and Hama governorate.¹⁰⁶ Detainees were held in unofficial locations and in official detention facilities of security branches and prisons where torture and ill-treatment were rampant.¹⁰⁷ The Syria COI documented how "[m]embers of [g]overnment security forces . . . used rifle butts, sticks, pipes, bars, cables, and . . . a nail-studded stick to assault [detainees]" including while naked. Detainees were also "subjected to humiliating and degrading treatment, including various forms of torture" such as mock executions, whipping, electric shocks, sexual violence, among others.¹⁰⁸ In several cases, detainees were held incommunicado for a range of periods; government forces denied holding detainees, amounting to enforced disappearance; and deaths in custody were reported.¹⁰⁹

Terrorist groups also continue to contribute to the violence. ISIL has attacked civilian and interim government forces in the northern regions of the country, including Deir ez-Zor, Raqqa, and Al-Hassakah.¹¹⁰ Additionally, in May 2025, ISIL "launched deadly attacks on interim government

¹⁰⁶ Syria COI 2026 Report, *supra* note 17, at ¶¶ 44-55.

¹⁰⁷ *Id.* at ¶¶ 46-48.

¹⁰⁸ *Id.* at ¶ 48.

¹⁰⁹ *Id.* at ¶¶ 50, 52.

¹¹⁰ Pinheiro, *supra* note 43.

forces and US-backed elements in Southern Syria, marking its first coordinated operations in the post-Assad era.”¹¹¹ There were also deadly attacks on the Mar Elias church in Damascus on June 22, 2025, which reportedly killed 25 people and injured 63 others, as well as the Ali Bin Abi Talib Mosque in Homs city on December 26, 2025, which reportedly killed at least eight civilians. Both serve as horrific examples of ongoing terrorism-related violence in the country.¹¹²

The UN Commission of Inquiry has concluded that the situation in Syria is “fragile and unpredictable” and the “rapidity of . . . change in Syria is inherently volatile.”¹¹³ It focused on the risks of “repeated massacres and human rights violations. . . .”¹¹⁴

¹¹¹ *Id.*

¹¹² Syria COI 2026 Report, *supra* note 17, at ¶100.

¹¹³ Bill Frelick, *As Many Syrian Refugees Return Home, Others Cannot*, Human Rights Watch (Dec. 10, 2024), <https://www.hrw.org/news/2024/12/10/many-syrian-refugees-return-home-others-cannot>.

¹¹⁴ Press Release, OHCHR, “The future of Syria is in the balance:” UN Commission sounds alarm on renewed violence amid hopes for justice and peace (Oct. 30, 2025), <https://www.ohchr.org/en/press-releases/2025/10/future-syria-balance-un-commission-sounds-alarm-renewed-violence-amid-hopes>.

4. Humanitarian conditions in Syria are dire.

According to Human Rights Watch, over 90 percent of Syrians live below the poverty line.¹¹⁵ Over half the population struggles to access basic necessities, including adequate food and safe water. At least 16.5 million required aid, yet as of September 2025, UNHCR announced that only 24% of required funds were available.¹¹⁶ Fourteen years of conflict have “decimated civilian infrastructure, severely affecting access to shelter, health care, electricity, education, public transportation, water and sanitation.”¹¹⁷ Entire towns are uninhabitable; schools, hospitals, roads, water facilities, and electrical grids are damaged; public services are barely functional; and the economy is in freefall, with reconstruction needs estimated to exceed \$250 billion.¹¹⁸ Ultimately, “the absence of services

¹¹⁵ HRW World Report 2026, *supra* note 27.

¹¹⁶ *Id.*; Press Release, UNHCR, A million Syrians have returned home, but more support needed so millions more can follow (Sept. 24, 2025), <https://www.unhcr.org/news/press-releases/million-syrians-have-returned-home-more-support-needed-so-millions-more-can>.

¹¹⁷ HRW World Report 2026, *supra* note 27. *See also* Doctors Without Borders, *What does Syria look like a year since the fall of Assad?* (Dec. 11, 2025), <https://www.doctorswithoutborders.org/latest/what-does-syria-look-year-fall-assad>.

¹¹⁸ Human Rights Watch, *US, EU, UK: Lift Syria Sanctions Hindering Recovery* (Feb. 18, 2025), <https://www.hrw.org/news/2025/02/18/us-eu-uk-lift-syria-sanctions-hindering-recovery> [hereinafter *Lift Syria Sanctions*].

undermines any prospects for dignified and sustainable living.”¹¹⁹ The healthcare system, for example, is in “critical condition, with over half of Syria’s hospitals nonfunctional, and with severe shortages of medical and other necessary supplies,”¹²⁰ as attacks on healthcare were a “weapon of war.”¹²¹ Over one million returnees since the fall of Assad have only served to place “additional pressure” on these scarce resources and fragile systems.¹²²

Additionally, “[v]iolations of housing, land and property rights pose a significant barrier to dignified[, safe and sustainable] return of many Syrian refugees and internally displaced,” as over 87% of Syrian refugee property owners have reported their homes as uninhabitable, destroyed, or severely damaged following “deliberate widespread destruction and looting of cities, towns and villages by former

¹¹⁹ Access Center for Human Rights, *Housing Land and Property: A Legal, Political and Humanitarian Barrier to Refugee Return* (Jan. 2026), <https://achrights.org/en/2026/01/20/16188/>.

¹²⁰ *Lift Syria Sanctions*, *supra* note 118.

¹²¹ *See, e.g.*, Indep. Int’l Comm’n of Inquiry on the Syrian Arab Republic, U.N. Doc. A/HRC/24/CRP.2 (Sept. 13, 2013); SJAC, *Documenting Attacks on Medical Facilities in Syria* (Feb. 23, 2016), <https://syriaaccountability.org/documenting-attacks-on-medical-facilities-in-syria/>.

¹²² Doctors Without Borders, *supra* note 117; OCHA, *Syrian Arab Republic: Humanitarian Situation Report No. 7* (June 30, 2025), <https://www.unocha.org/publications/report/syrian-arab-republic/syrian-arab-republic-humanitarian-situation-report-no-7-23-june-2025-enar>.

Government forces and non-state armed groups.”¹²³ Moreover, barriers to access to documentation (e.g., property or land deeds or personal identification documents) and an overall fragmented, dysfunctional, politicized, and inadequate housing, land and property system under the interim authorities, alongside “the broken judicial and record-keep system inherited from” the former government, obstructs efforts of reclaiming housing, land and property rights.¹²⁴ Obstacles to the safe and dignified return of female-headed households is further compounded by discriminatory property and inheritance laws which preference men.¹²⁵ Ultimately, such housing, land and property violations, if left unaddressed, “risk fueling further violence.”¹²⁶

Syria also continues to grapple with “one of the largest displacement crises in the world,”¹²⁷ as an estimated 5.54 million Syrians, mainly women and children, remain internally displaced within the country as of March 2026, living in overcrowded camps, informal settlements and makeshift

¹²³ Pinheiro, *supra* note 52. *See also* Indep. Int’l Comm’n of Inquiry on the Syrian Arab Republic, ¶¶ 2, 5, 7-8, 77, U.N. Doc. A/HRC/58/CRP.2 (Dec. 6, 2024).

¹²⁴ Access Center for Human Rights, *supra* note 119; Pinheiro, *supra* note 43.

¹²⁵ Syria COI 2026 Report, *supra* note 17, at ¶61.

¹²⁶ *Id.* at ¶56

¹²⁷ World Health Organization, *Syria Crisis* (Dec. 20, 2024), <https://www.who.int/emergencies/situations/syria-crisis>.

shelters.¹²⁸ Explosive remnants of war, including landmines and unexploded ordnance, represent another continuous threat to civilians, causing severe injuries and fatalities, particularly amongst children.¹²⁹ Current and ongoing international and internal conflicts further compound these issues, as deliberate hampering of access to humanitarian aid,¹³⁰ destruction of critical infrastructure, including attacks on healthcare and dams, looting and pillaging of homes and villages by interim government forces and other armed groups, and displacement of entire communities across the country¹³¹ have continued.

Within this troubling context, women, who have been disproportionately affected by the preceding

¹²⁸ Humanitarian Overview Issue No. 4, *supra* note 84; Doctors without Borders, *Syrians share stories of violence and displacement from temporary shelters in the northeast* (Feb. 11, 2025), <https://www.msf.org/syrians-share-stories-violence-and-displacement-temporary-shelters-northeast>.

¹²⁹ Doctors Without Borders, *supra* note 117.

¹³⁰ HRW World Report 2026, *supra* note 27; Human Rights Watch, *Syria: Accountability Lacking for Sweida Abuses* (Jan. 15, 2026), <https://www.hrw.org/news/2026/01/15/syria-accountability-lacking-for-sweida-abuses>.

¹³¹ See Press Release, OHCHR, UN Syria Commission calls for protection of civilians, humane treatment of ex-combatants and the safeguarding of evidence of crimes (Dec. 16, 2024), <https://www.ohchr.org/en/press-releases/2024/12/un-syria-commission-calls-protection-civilians-humane-treatment-ex>; Access Center for Human Rights, *supra* note 119 (noting that fighting in March and July 2025 resulted in the displacement of over 110,000 individuals).

conflict and the events which have followed since, continue to be “largely excluded from transitional decision-making and political processes.”¹³²

CONCLUSION

Shortly after the fall of former government, the UN Refugee Agency (UNHCR) published its position on returns to the Syrian Arab Republic. It explained that “[a]t this moment in time, Syria continues to be affected by attacks and violence in parts of the country; large-scale internal displacement; contamination of many parts of the country with explosive remnants of war; a devastated economy and a large-scale humanitarian crisis. . . .”¹³³

Against this background, UNHCR continues to call on States not to “forcibly return Syrian nationals. . . to any part of Syria.”¹³⁴ Additionally, “[i]n view of the current uncertainty of the situation in Syria, UNHCR calls on asylum States to suspend the issuance of negative decisions on applications for international protection by Syrian nationals or by stateless persons who were former habitual residents of Syria. The suspension of the issuance of negative decisions should remain in place until such time as

¹³² HRW World Report 2026, *supra* note 27; Syria COI 2026 Report, *supra* note 17, at ¶ 33, 105.

¹³³ UNHCR, *Position on Returns to the Syrian Arab Republic*, ¶4 (Dec. 2024), https://www.refworld.org/sites/default/files/2024-12/unhcr_position_on_returns_to_syria_-_16_dec_2024.pdf.

¹³⁴ *Id.*

the situation in Syria has stabilized”¹³⁵ Specifically, “UNHCR does not consider that the requirements for cessation of refugee status for beneficiaries of international protection originating from Syria have currently been met.”¹³⁶ UN High Commissioner for Refugees, Filippo Grandi, explained “[i]t is too early to remove protection safeguards.”¹³⁷

The facts underlying these conclusions have not changed. By any measure, Syria remains in a state of armed conflict. Widespread violence by various factions continues to threaten civilian populations across the country, particularly minorities. Compounding the effects of such violence, critical humanitarian conditions, continuing violations of housing, land, and property rights, and an ongoing displacement crisis prevent the safe, dignified and sustainable return of any Syrian refugee.

¹³⁵ *Id.* at ¶6. *See also* UNHCR, *Operational Framework: Voluntary Return of Syrian Refugees and IDPs 2025* (Feb. 2025), https://www.unhcr.org/sites/default/files/2025-02/UNHCR_Operational_Framework%201_0.pdf.

¹³⁶ *Id.* at ¶7.

¹³⁷ Filippo Grandi, UN High Commissioner for Refugees, Statement at the Brussels Syria Conference (Mar. 17, 2025), <https://www.unhcr.org/news/speeches-and-statements/high-commissioner-s-statement-brussels-syria-conference-0>.

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