

## U.S. Walks Back Sanctions Against Turkish Government

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Merely a week after sanctioning various departments of the Turkish government over actions related to the conflict in Syria, the U.S. government has now removed such sanctions.

On October 14, 2019, President Trump issued an Executive Order “Blocking Property and Suspending Entry of Certain Persons Contributing to the Situation in Syria” (the “E.O.”), targeting the Turkish government for the recent military offensives into northeast Syria. The E.O. provided the authority to impose a broad spectrum of comprehensive sanctions on Turkey and those supporting Turkey’s military efforts. Accompanying the E.O., the U.S. Department of the Treasury’s Office of Foreign Asset Controls (“OFAC”) designated two government ministries – the Government of Turkey’s Ministry of National Defense and the Ministry of Natural Resources, and three senior Turkish officials – the Minister of Interior, the Minister of Energy, and the Minister of Defense. OFAC’s designation of a NATO ally’s government ministries was unprecedented.

Four days later, on October 18, Turkey agreed to a 120-hour ceasefire and committed to defeating ISIS alongside the United States.

Five days later, on October 23, President Trump announced that the ceasefire was permanent and the sanctions on the Turkish ministries and ministers would be lifted. Immediately, OFAC announced their removal from OFAC’s Specially Designated Nationals and Blocked Persons list. However, the sanctions lift came with a warning - President Trump stated in his announcement that the sanctions would be lifted “unless something happens that we are not happy with.” It is difficult to predict what that “something” might be. Importantly, although the designations have been lifted, the E.O. remains in place and provides the Administration a great deal of authority to impose severe sanctions against the Turkish government for any continued hostilities in the region.

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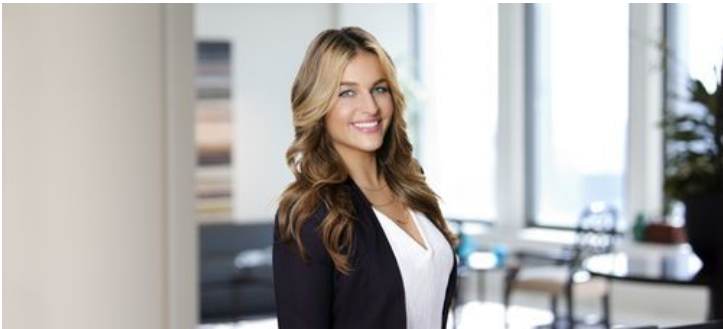
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