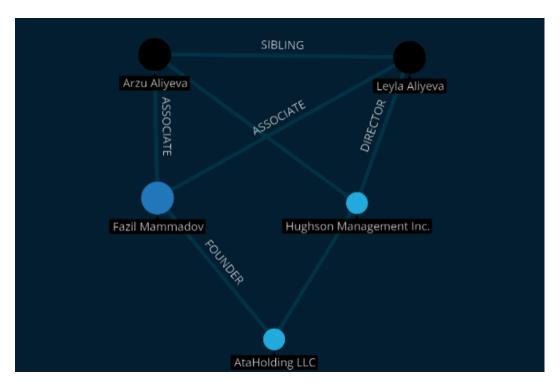


Network Insight: AtaHolding and Triangle

The former tax ministry officials behind the offshore companies that bought and sold overseas real estate on the sisters' behalf

Leyla and Arzu Aliyeva are linked to a network of former Azerbaijani tax ministry officials who set up and ran AtaHolding, one of the sisters' Azerbaijani conglomerates, and went on to manage offshore companies that bought and sold high-value overseas properties on their behalf.^[664] [971] [536]

The network centers around Azerbaijan's former tax minister, Fazil Mammadov (now deceased). During his 17 years in post, corruption in the ministry skyrocketed to epic proportions, with multiple scandals and dismissals of mid-ranking officials. [965] [966] [969] [970] [1364] [1365] In parallel to his official duties, Mammadov secretly set up and ran AtaHolding, an Azerbaijani financial conglomerate. [534] This is despite Azerbaijani law forbidding officials from engaging in business. [1164] [1170] If it wasn't for the Panama Papers leak of information from offshore law firm Mossack Fonseca, his secret business dealings would never have been exposed. Nor would it be known that Leyla and Arzu Aliyeva went on to acquire a majority stake in AtaHolding via a Panama shell company called Hughson Management Inc. [534]



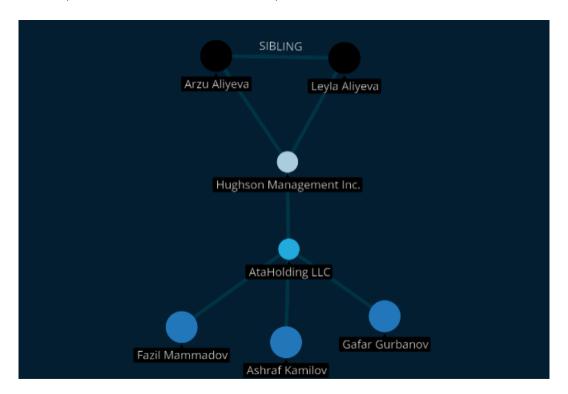
This secretive setup indicates that senior officials used third parties to acquire and engage in business on their behalf, which is a popular tactic in Azerbaijan to side-step anti-corruption laws.^[1294] In addition, the use



of corporate vehicles and intermediaries to obscure beneficial ownership is a red flag for suspicious activity, according to the Financial Action Task Force (FATF).[1294] *

AtaHolding owns the five-star Excelsior Hotel & Spa in Baku,^[1366] as well as a poultry farm in Shamkir, in the country's northwest.^[544] In 2015, AtaHolding's assets were worth 634 million manats (\$600 million), but by the end of 2019, the last year it published records, they had shrunk to just 85 million manats (\$50 million).^[544] [248] [251]

Large conglomerates owned by powerful families need loyal managers to function smoothly. Several of AtaHolding's senior managers are former Azerbaijani tax ministry officials, including its former chairman, Gafar Gurbanov, and its most recent chief executive, Ashraf Kamilov.^[540] [533] [521] [536]



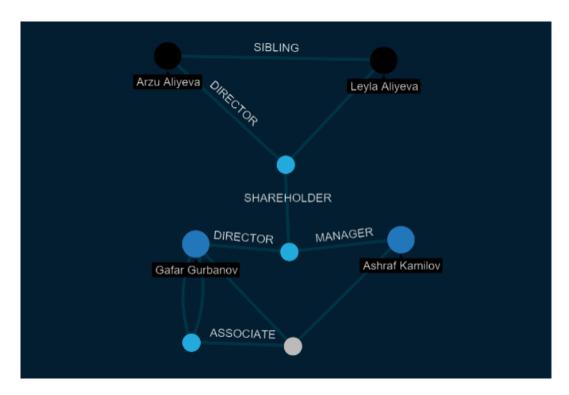
After proving themselves at the helm of a first family firm, Kamilov and Gurbanov moved on to arranging overseas real estate deals on behalf of members of the family, including Leyla and Arzu Aliyeva.

Gurbanov co-founded and runs Triangle Investments and Development Limited, a London-based real estate investor and private wealth manager. [646] [538] Kamilov became a client of Triangle as the beneficial owner—on corporate documents hidden offshore—of a 212.5 million GBP (\$292 million) Central London real estate investment called Holborn Links that was arranged by Triangle in 2014. [971] [544] [533] [521] [536] [645] [646] [972] It is

^{*} The Financial Action Task Force (FATF) is an international body that develops and promotes policies to protect the global financial system and sets standards for money laundering controls.

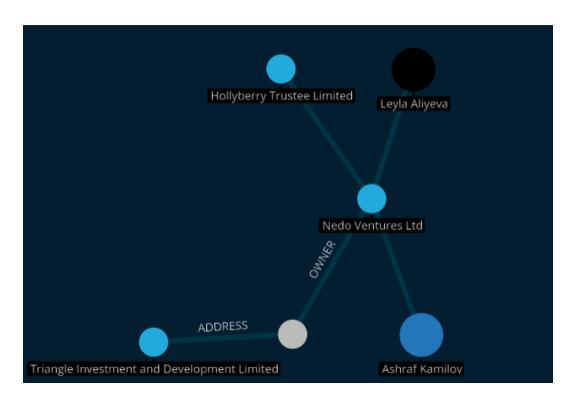


unclear how a former tax ministry official was able to amass the wealth required for such a large investment, but Kamilov is a partner with the first family—via his Azerbaijani conglomerate Synergy Group—in other business deals.^[531] [521] [534]



Between 2010 and 2016, Triangle Investment and Development Limited was based out of an office at 8 Cavendish Square in Marylebone, Central London. [990] [991] In 2009, the entire office block was acquired by Nedo Ventures Ltd, a British Virgin Island company, for 9.5 million GBP (\$13.8 million). [275] At the time of the property purchase, Kamilov controlled Nedo Ventures, according to the Organized Crime and Corruption Reporting Project. [275] Ownership of Nedo Ventures was later transferred to Leyla Aliyeva, then on to her grandfather Arif Pashayev, and then to an Aliyev family trust administered on the Isle of Man. [276] [275] [303] [539] [642] [675] [536] [538] [676]







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