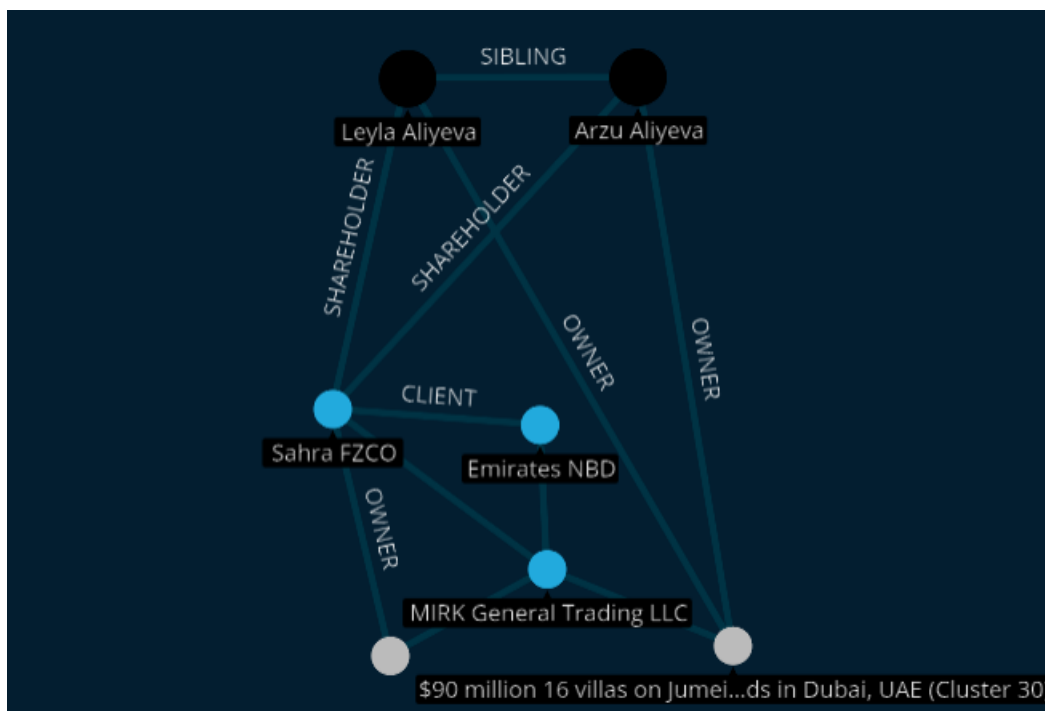


## Network Insight: The MIRK Group of Companies

### The sisters' real estate manager and transfers connected to their Dubai properties

Leyla and Arzu Aliyeva own several high-value properties in Dubai that are managed by MIRK General Trading LLC, a Dubai-based architecture and engineering consultancy.<sup>[673]</sup> According to a confidential report into money laundering by New York-based investigators Duff & Phelps, MIRK facilitated several large rental payments from these properties to the sisters via its account at Emirates NBD, a government-controlled bank in Dubai. Meanwhile, investigators found that the receiving bank in Malta, Pilatus Bank, failed to run basic anti-money laundering checks on these transactions.<sup>[341] [673] [551]</sup>

The use of private banks and intermediaries such as high-end real estate agents by politically exposed persons (PEPs) from autocratic and corruption-prone countries—such as Azerbaijan—is a major red flag for potentially suspicious activity, according to the Financial Action Task Force (FATF).<sup>[1294]</sup> \*



According to Duff & Phelps, MIRK General Trading LLC, one of several UAE companies in the MIRK group of companies, was the manager and rent collector for nine villas on the Palm Jumeirah islands, as well as 16

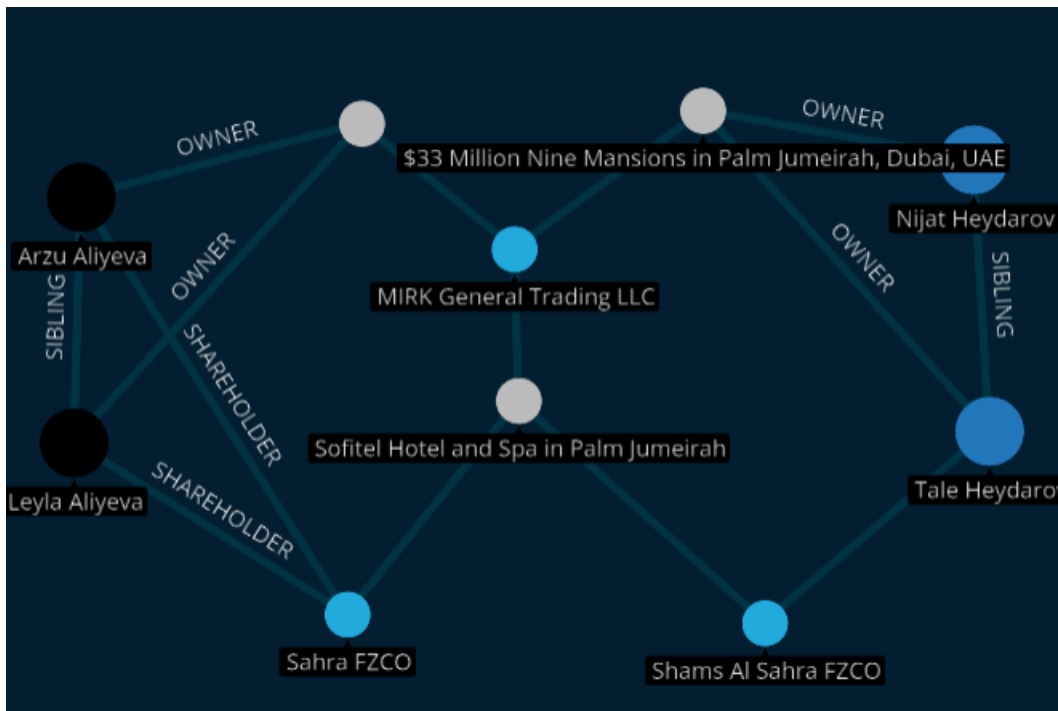
\* The Financial Action Task Force (FATF) is an international body that develops and promotes policies to protect the global financial system and sets standards for money laundering controls.

luxury villas on the nearby Jumeirah Islands.<sup>[341] [516] [517]</sup>

The nine villas on the Palm Jumeirah islands are owned are by Leyla and Arzu Aliyeva in their own names, and the 16 villas on the Jumeirah Islands are owned jointly by the sisters and their business partners, Tale and Nijat Heydarov, the sons of Azerbaijan’s Emergency Situations Minister Kamaladdin Heydarov.<sup>[341]</sup>

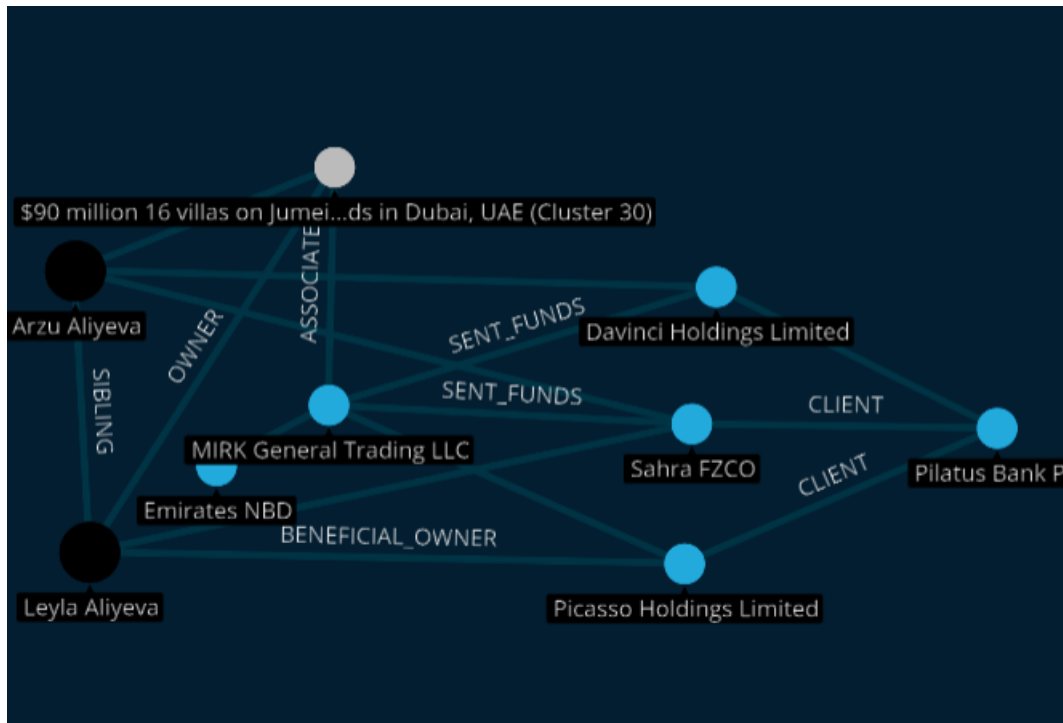
Jumeirah Islands is one of the most sought-after private developments in Dubai. Built by Nakheel Properties, it consists of 46 private islands surrounded by a man-made lagoon.<sup>[960]</sup> The Aliyeva sisters and Heydarov brothers own all the villas on one of these islands, Cluster 30 in the southernmost corner of the development, reportedly worth about \$90 million.<sup>[341] [1363] [1361]</sup> Villas on the private islands can fetch as much as \$40,000 a month in rent, or almost half a million dollars a year.<sup>[1349] [1350] [1351]</sup>

In addition, MIRK Architectural & Engineering designed the five-star Sofitel hotel and spa—which is ultimately owned by the Aliyeva sisters and Heydarov brothers—on the man-made Palm Jumeriah islands.<sup>[673] [551] [341]</sup>



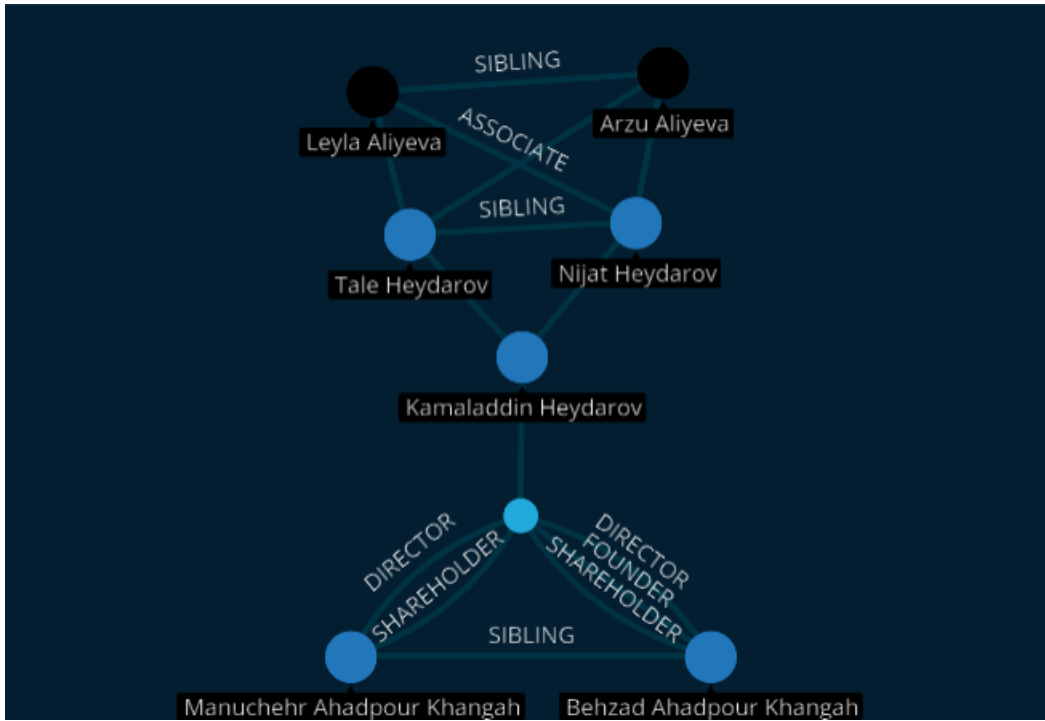
Duff & Phelps traced several large transactions involving the MIRK group of companies and the sisters’ villas in Dubai. Between August 2015 and April 2017, MIRK General Trading paid out a total of 36.3 million AED (\$9.9 million) from an account at Emirates NBD to accounts at Pilatus Bank held by Picasso Holdings Limited, Davinci Holdings Limited, and Sahra FZCO—all of which are registered in Dubai and belong to Leyla and Arzu Aliyeva.<sup>[341] [348] [425] [426] [11] [427] [428]</sup> According to Duff & Phelps, Pilatus Bank failed to conduct the necessary anti-money laundering checks—including verifying that the villas actually existed—before processing these transactions.<sup>[341]</sup>

Emirates NBD told The Sentry: “The bank is unable to provide any comment to confirm or deny any client relationships due to our internal policies and our regulatory obligations.”<sup>[1400]</sup>



MIRK General Trading is 95% owned by Azerbaijani-Iranian businessman Manouchehr Khanghah, while his younger brother Behzad—chief executive of the MIRK group of companies—owns the remaining 5%.<sup>[131]</sup><sup>[132]</sup><sup>[133]</sup>

Azerbaijan’s Emergency Situations Minister Kamaladdin Heydarov is a former manager of MIRK General Trading,<sup>[131]</sup><sup>[132]</sup><sup>[133]</sup> raising questions about the real estate agent’s independence from the Heydarov family.



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