

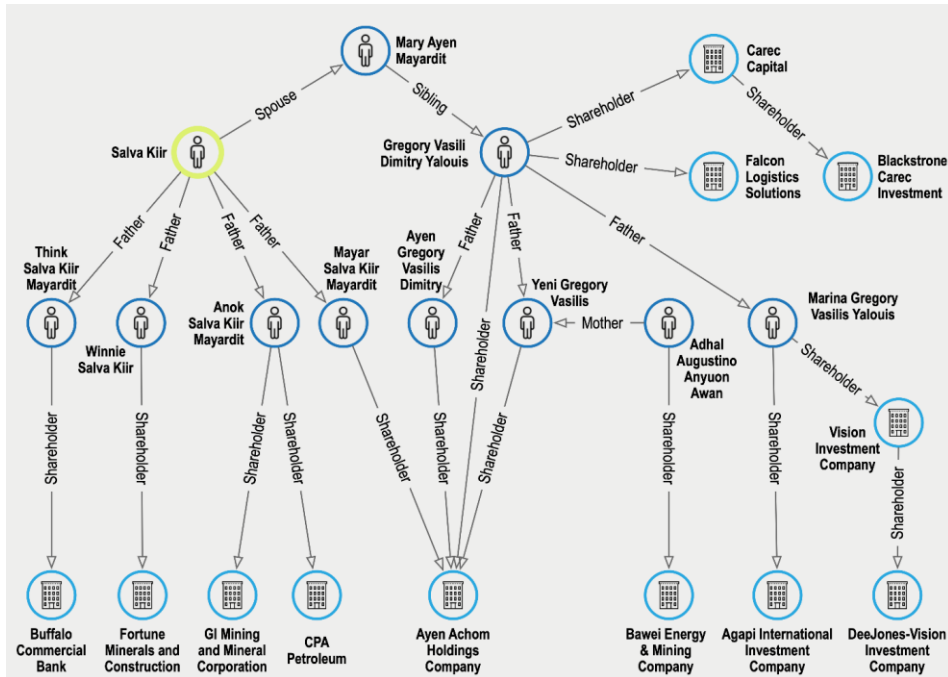
NETWORK INSIGHT: High-risk industries

Companies owned by the Kiir family operate in high-risk and lucrative industries that are central to the South Sudanese economy, including mining, oil, and banking.^[177]

Mining

Though the mining sector has seen rapid development, a weak regulatory environment and insufficient due diligence practices expose the sector to abuse by the political elite.^[169] Poor transparency of the ultimate beneficial owners of corporate entities holding mining rights undermines the possibility for public scrutiny of those profiting from mineral wealth.

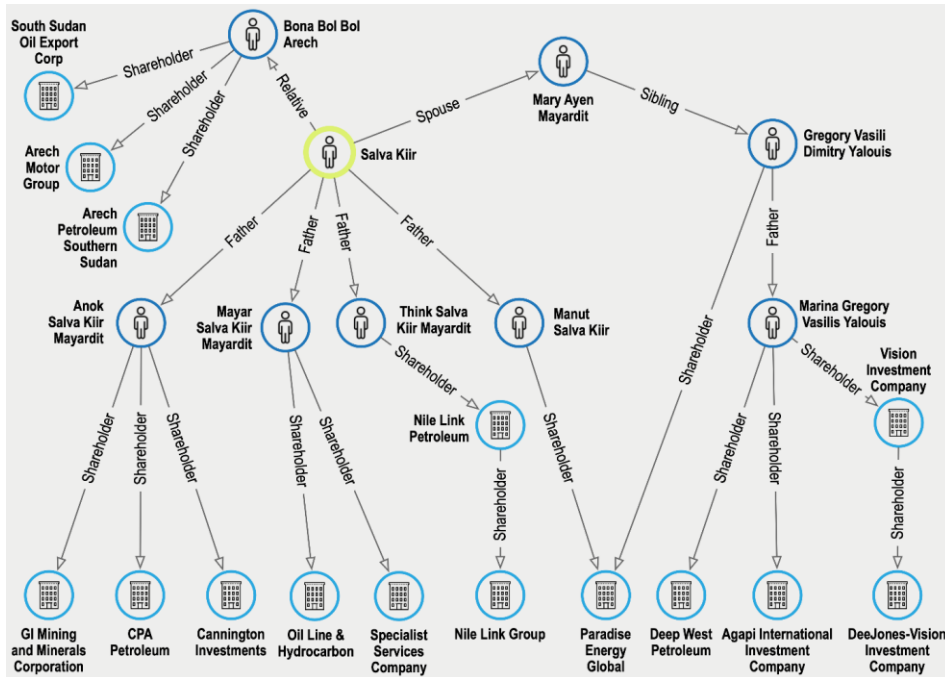
- Kiir family members held shares in 12 mining companies.
- Anok Kiir, the daughter of President Kiir, was a shareholder in GI Mining and Minerals Corporation Ltd.^[18]
- Adut Kiir, the daughter of President Kiir, was a shareholder in Rocky Mining Industries Limited,^[25] though the joint shareholder said that the company never became operational.^{[182][167]} In a 2019 response to The Sentry's report "The Taking of South Sudan," the Office of the President said that Adut Salva Kiir Mayardit was a 50% shareholder in Rocky Mining and that the company was not active.^[214]
- Winnie Kiir, the daughter of President Kiir, formed a mining company with Chinese investors when she was 19 years old.^[17] In August 2016, Fortune Minerals and Construction received two exploration licenses in the mineral-rich areas of Central and Eastern Equatoria.^[183] Several weeks after they received a license to explore for minerals near a town called Mundri, South Sudan's military reportedly launched a sustained military campaign in the area, destroying healthcare centers, committing mass rapes, and forcibly displacing thousands of people.^{[184][207]}^[170] In a 2019 response to The Sentry's report "The Taking of South Sudan," the Office of the President said that Winnie Salva Kiir was a 11% shareholder in Fortune Minerals and that "the company never took off since obtaining the licenses."^[214]



Oil

The South Sudanese economy is highly dependent on oil revenues,^[185] and the industry is fraught with corruption and mismanagement and lacks transparency, according to a review by the US State Department.^[179]

- Kiir family members held shares in 15 oil companies.
- Thiik Kiir, son of President Kiir, was listed as an owner of Nile Link Petroleum.^[99] Another of Kiir's sons, Mayor Kiir, was listed as an owner of Oil Line & Hydrocarbons Limited and of Specialist Services Co. Ltd., a company that describes itself as being involved in "oilfield services and petroleum supply."^{[130] [35]}
- Marina Gregory Vasilis, the niece of President Kiir, was a beneficial owner of DeeJones-Vision Investment Company Limited via Vision Investment Company Limited, established a month before DeeJones-Vision.^{[67] [158]} A Nigerian national controlled the majority owner of DeeJones-Vision Investment. The company reported oil exploration and operations as its nature of business.^[158]



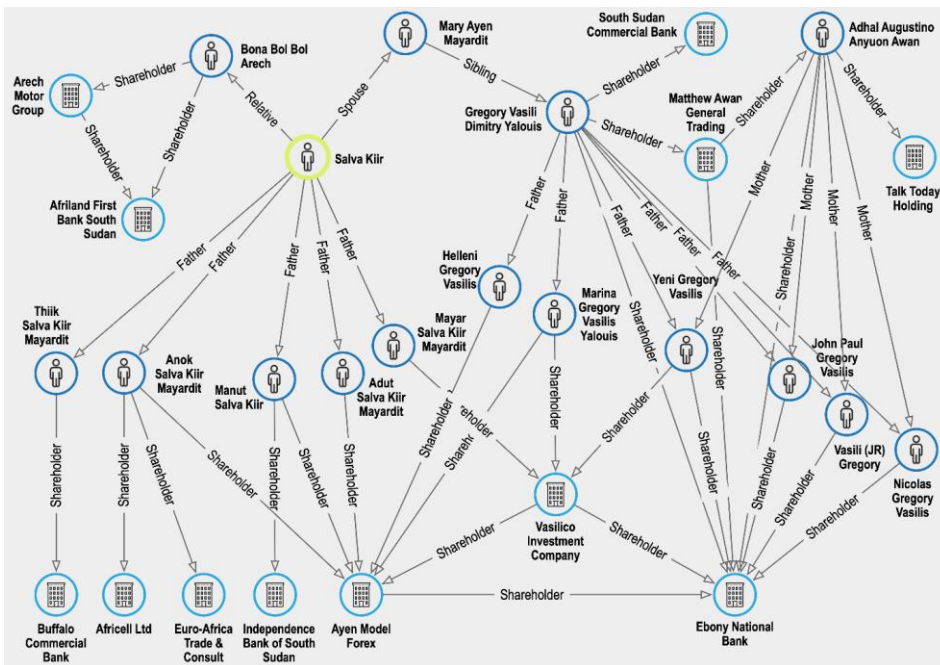
Banking

When the political elite control financial institutions, there's a risk of capture, whereby they are able to use their access to bypass the standard monitoring and enhanced due diligence necessary to safeguard against laundering the proceeds of corruption.^[186] A study on the banking sector in South Sudan conducted by The Sentry found that, as of 2018, more than half of the banks operating in South Sudan were partially owned or controlled by politically exposed persons and were used by these political elites to transfer ill-gotten gains abroad.^[174] Foreign exchange houses are also a notoriously lucrative business for well-connected individuals in South Sudan.

- Kiir family members were shareholders in nine financial institutions and foreign exchange companies. These include subsidiaries of regional banks, such as Afriland First Bank South Sudan,^[34] and local South Sudanese banks.
- Thiik and Mayar Kiir, sons of President Kiir, held shares in Buffalo Commercial Bank in 2007, when they were only 19 and 20 years old, respectively, alongside close Kiir associate Benjamin Bol Mel.^[114] Bol Mel, sanctioned for corruption by the US in December 2017,^[198] is a senior presidential envoy and an advisor on Kiir's election campaign.^{[199] [200]}
- Manut Kiir, son of President Kiir, was a minority shareholder of Independence Bank of South

Sudan Plc.^[88] According to a 2019 response to The Sentry, a shareholder of Independence Bank of South Sudan stated that the bank never became operational; they also denied that the son of the president was associated with the bank.^[216]

- Several of Kiir's children, as well as Kiir's brother-in-law Gregory Vasilis and members of his family, were shareholders in Ayen Model Forex, a company ostensibly involved in exchanging foreign currency.^[43] Ayen Model Forex was actively bidding for foreign currency of as February 2023.^[208] [43]
- Members of the Kiir family owned shares in Ebony National Bank through two companies: Ayen Model Forex and Vasilico Investments.^[48] [43] [66]



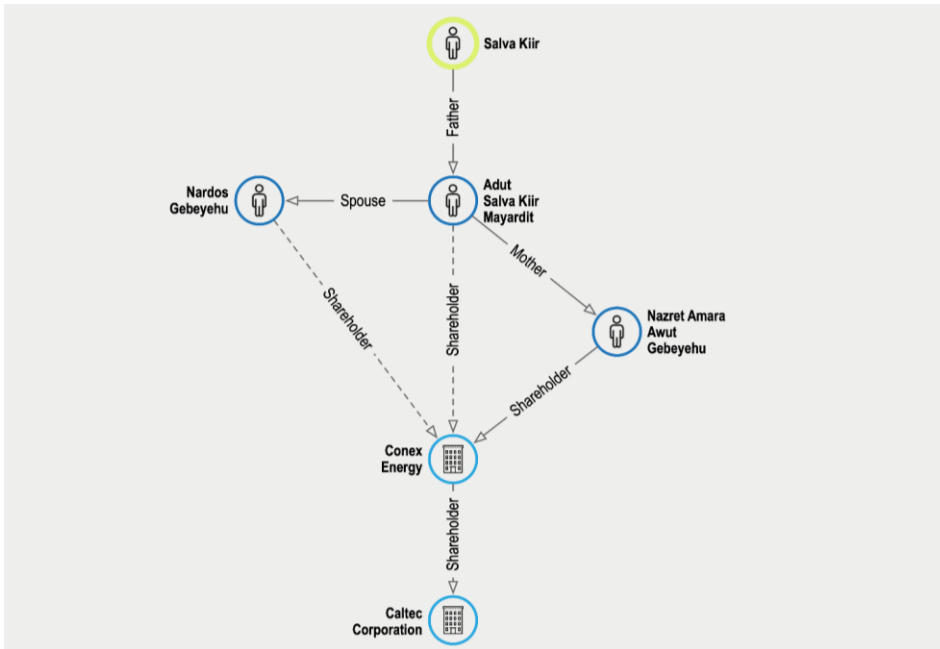
NETWORK INSIGHT: High-risk connections

The Kiir family went into business with a range of other high-risk individuals, including members of the National Secret Service, the military, and the political elite in other countries.^[177]

Political elite

Kiir relatives formed companies with high-profile businesspeople and politicians from around the region.^[170] These political elites often used corporate vehicles to obscure their identities as beneficial owners in joint ventures, a red flag for suspicious activity.^[177]

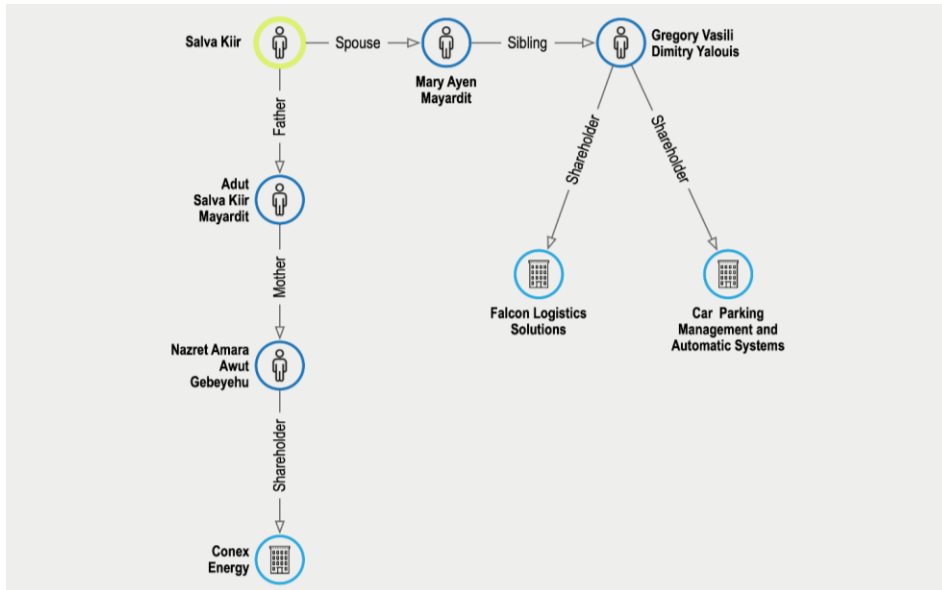
- Adut Kiir, the daughter of President Kiir, married Nardos Ghebeyehu in 2011.^[201] ^[209] The two used their company, Conex Energy Co.,^[2] to form a joint venture called Caltec Corporation with a company controlled by an influential senator and son of the former president of Kenya.^[19] ^[187] ^[188] Caltec's website described the firm as a "Special Purpose Vehicle (SPV) to specifically engage in the provision of services in the oil sector." Waste management, drilling, logistics, and air transportation are among the services it said it provided.^[210] ^[170] Adut Kiir transferred her shares to her daughter, Nazret Amara Awut Gebeyehu in 2013.^[14] In a 2019 response to The Sentry's report "The Taking of South Sudan," the Office of the President said that Nazret Amara was a 45% shareholder in Conex Energy and that the company was active.^[214]



National Security Service

The National Security Service (NSS) operates under the Kiir's direct supervision.^[176] The NSS has been repurposed as the president's own security force against internal threats to his rule.^[189] A corporate network of companies owned by members of the NSS operates as part of the NSS's approach for engaging in state capture and repression.^[165] Several members of the Kiir family have engaged in business dealings with members of the NSS. Kiir also named his brother-in-law, Gregory Vasili, the deputy director-general of the General Intelligence Bureau of the NSS in 2021.^[180]

- Kiir's granddaughter was a shareholder in Conex Energy alongside an NSS brigadier general.^[2] Vasili owned shares in Falcon Logistics Solutions Co alongside the same NSS official.^[50]
- Car Parking Management stakeholders included Vasili and then-senior National Security Service official Abud Stephen Thionkol,^[78] both of whom have been designated for sanctions by the US.^{[190][168]}

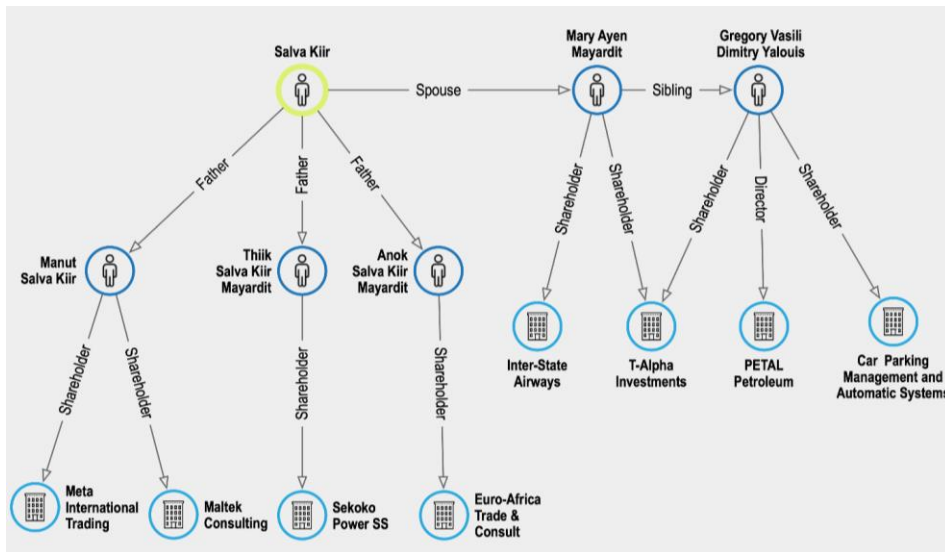


Military

A study of the business activities of top military and opposition militia leadership found that leaders had engaged in business activities indicative of money laundering, all while being responsible for forces enacting mass atrocities.^[168] In the course of these business activities, several individuals formed corporate ties with members of Kiir's family, often using their own family members as shareholders on companies.

- Thiik Kiir, the son of President Kiir, was listed as shareholder of Sekoko Power SS Ltd alongside family members of Paul Malong, leader of the South Sudan United Front/Army.^{[26] [191]} In a 2019 response to The Sentry's report "The Taking of South Sudan," the Office of the President said that Thiik Salva Kiir Mayardit and Paul Malong's family member were shareholders in Sekoko Power and that the company was not active.^[214] In a 2020 response to The Sentry, a shareholder of Sekoko Power SS Ltd stated that the company never traded and was dormant.^[217]
- Gregory Vasili, Kiir's brother-in-law, owned shares in Car Parking Management with Malong's deputy, Bol Akot.^{[78] [190]} Vasili was sanctioned by the US government in December 2018 for facilitating conflict and the sale of weapons.^[181]
- Manut Kiir, the son of President Kiir, was listed as a shareholder alongside Lt. General Salva Mathok Gengdit's son on two companies: Meta International Trading Co Ltd and Maltek Consult.^{[148] [94]} In a 2019 response to The Sentry's report "The Taking of South Sudan," the Office of the President said that Manut Salva Kiir Mayardit and Gengdit's son were shareholders in Meta International and that the company was not active.^[214]

- Anok Kiir, the daughter of President Kiir, was shareholder in Euro-Afro Trade and Consult Ltd; Lt. Gen. Reuben Riak’s daughter also owned shares in the company.^[83] In a 2019 response to The Sentry’s report “The Taking of South Sudan,” the Office of the President said that Anok Salva Kiir Mayardit and Riak’s daughter were shareholders in Euro-Afro Tade and that they could not verify whether the company was active.^[214]
- Companies connected to the first family also received funds for military procurement. A company partially owned by the first lady, Interstate Airways,^[90] reportedly received six payments from South Sudan’s state oil company, Nile Petroleum Corporation (Nilepet) in 2014 for army logistics and the transportation of military hardware.^[172] In a 2019 response to The Sentry’s report “The Taking of South Sudan,” the Office of the President said that Mary Ayen Mayardit was a 33% shareholder in Inter-state Airways and that the company was active.^[214]
- Kiir’s wife and her brother, Vasili, were listed as shareholders of T-Alpha Investments in 2013.^[11] The Sentry reviewed documents showing that T-Alpha was a major fuel supplier for South Sudan’s military.^[173] T-Alpha was part of a joint venture, Petal Petroleum, with Malaysian state-owned oil company Petronas;^[76]^[119] T-Alpha Investments later purchased Petronas’ shares in Petal Petroleum for 25,000 euros (\$27,500).^[173]



NETWORK INSIGHT: Further risk factors

The Sentry identified other risk indicators in its examination of the Kiir family network.

Unclear business practices

Every company must describe the nature of their business in their articles of incorporation, according to the 2012 Companies Act.^[211] The Sentry found that numerous companies incorporated by members of the Kiir family provided extensive lists of activities, making it challenging to discern the actual nature of their business—and nearly impossible for a company to have experience across such a vast list of industries. Unclear business practices can challenge the assessment of typical and expected business activities—a usual standard to evaluate for irregular and suspicious activity indicative of money laundering.^[177]

<p>3) The objectives for which the company is established are: -</p> <p>i. To carry on the business of cash transportation services.</p> <p>ii. To carry on the business of security services, transportation, hospitality, healthcare and transportation.</p> <p>iii. To engage in all kind of services with respect to security, construction, exploration, drilling, development, production, processing, storage, transportation, distribution, import and export of goods, mining, and any other related services.</p> <p>iv. To provide security, accommodation and catering facilities for private companies, government corporations, and NGOs.</p> <p>v. To export and import skilled labor and professionals in the area of security services.</p> <p>vi. To construct facilities, distribute and maintain cars, industrial units, equipments, mining material storages, and buy and sell lubricants and spare parts.</p> <p>vii. To develop projects in connection with soil, asphalt, concrete, geology, and agriculture.</p>	<p>viii. To work on electro-mechanical projects and provide technical expertise in civil, mechanical, and biomedical fields.</p> <p>ix. To provide all kinds of services, including but not limited to catering, hairdressing, aviation and aviation facilities.</p> <p>x. To carry on the business of assembling, including, printing, and trading and any other related activities.</p> <p>xi. To conduct general trading activities in the areas of import and export trade and trade-fair trade.</p> <p>xii. To work in an agriculture way, in the development of commodities and health foods.</p> <p>xiii. To work in all fields of light and heavy industry.</p> <p>xiv. To conduct general trade and investment activities.</p> <p>xv. To import machinery, heavy equipment, including construction equipment and road construction equipment, electrical equipment, vehicles, auto-critical, fire tools, fire trucks, and all types of tractors. To import all types of hospital drug and equipment.</p> <p>xvi. To import all types of school materials and equipment.</p> <p>xvii. To import all different types of vehicles and vehicle spare parts.</p> <p>xviii. To engage in the business of construction, civil engineering, electrical engineering, concrete, road construction and rehabilitation, civil engineering construction, bridge service and repairs and other related business.</p> <p>xix. To work on building, building construction, designs, decoration, and generally to carry on the business of construction of houses, shops, schools, bridges, roads, and any other business related business.</p>	<p>xx. To export agricultural products, livestock, honey, dairy products, fish, skins, and all different types of fruits.</p> <p>xxi. To export oil, diamond, gold, copper, zinc, and any other minerals.</p> <p>xxii. To generally engage in import and export trading activities with a view to contributing to the development of South Sudan private sector.</p> <p>xxiii. To construct, maintain, and alter any building or works connected for the purposes of the company services.</p> <p>xxiv. To purchase, take lease, or in exchange, hire, or otherwise acquire, any immovable or movable property and any rights or privileges which the company may deem necessary or convenient for the purposes of the business.</p> <p>xxv. To purchase or otherwise acquire and hold immovable and movable property of all types in any part of the world and in particular places of trade, objects of decoration, articles, gems, jewellery, precious stones and metals, mortgages, debenture stock, bonds.</p> <p>xxvi. To carry on business as an investment facility with a view to increasing the value and profitability of the company.</p> <p>xxvii. To engage in the bank-bank business, business intermediation with a view to procuring loans and supplying funds to the intended government objectives.</p> <p>xxviii. To borrow or raise funds on the company may deem fit by issuing debentures or debenture stocks (prepaid or otherwise) and to secure the payment of such borrowments, whether in the form of mortgage charges or any other debts.</p> <p>xxix. To lend and advance money or to give credit to such persons or companies and on such terms or any other conditions.</p>	<p>xxx. To guarantee or become liable for the payment of any money for the performance of any obligation or any subsidiary or ancillary company under any conditions arrangement or otherwise however without holding any charge thereon or in connection therewith.</p> <p>xxxi. To enter into contract agreements with any other companies, firms, or parties with a view to carrying out business activities for which the company has been established.</p> <p>xxxii. To carry on any other activities which may be in the opinion of the board of directors of the company in capable of being advantageously or conveniently carried on by the company in connection with or ancillary to any of the company's objects or which may be suitable to undertake with a view to developing or rendering valuable prospects or having to secure any property real or personal belonging to the company or in which the company may be interested.</p> <p>xxxiii. To purchase or take in lease or in exchange or otherwise acquire, immovable, movable, mining, oilfields, wells, oil, gas, petroleum, minerals, land, and other rights, and to take to account, dispose of and deal with immovable and movable property rights, and privileges of all kinds and in particular places of land, buildings, subterranean, objects of decoration, and objects, jewellery, precious stones and metals, mortgages, mortgages, and debenture produced commodities options and interests.</p> <p>xxxiv. To pay for any property or rights acquired by the company either in cash or partly paid up shares with or without preference or dividend rights in respect of dividends or equipment or capital or otherwise by any securities which the company has power to issue or partly in one mode and partly in another and generally on such terms as the company may determine.</p> <p>xxxv. To grant licenses or concessions over and in respect of any property or rights of the company.</p>
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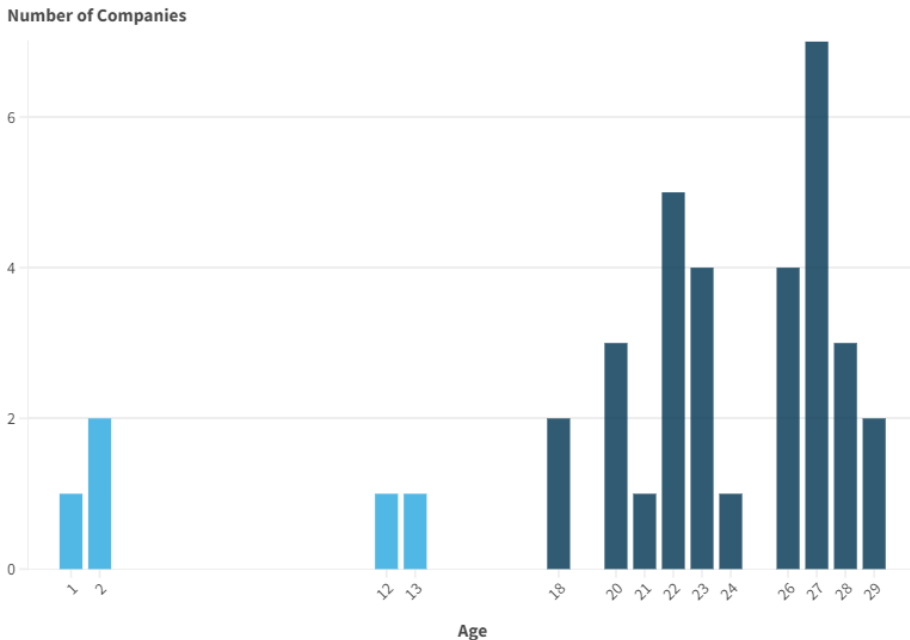
A description of the business activities for a company with over 50 different objectives, including to "import all types of school materials and equipment," "export oil, diamond, gold, copper, zinc, and any other minerals," and "export and import skilled labor and professionals in the area of security service."^[105]

Public procurement red flags

Several companies that included Kiir family members in their lists of shareholders received public contracts or letters of credit, which are essentially guarantees from a bank to a seller that they'll be paid by the buyer. The Sentry, in examining these companies, identified a number of red flags for trade-based money laundering.^[178] Some companies were incorporated shortly before receiving the contract or letter of credit and therefore could not demonstrate a successful track record to adequately justify that the company had the experience to successfully deliver on the contract. In several cases, contracted companies lacked trade records that would indicate the required activities had been completed, even though they had already been paid.^[166]

Minors as shareholders

The children and grandchildren of Kiir and his brother-in-law, Gregory Vasili, served as founding shareholders for a number of companies when they were still minors. This raises questions as to whether these Kiir family members had the experience necessary to meaningful contribute to the businesses. Listing children as company shareholders is a common tactic used by corrupt political elites to circumvent government anti-corruption measures and enhanced due diligence requirements by financial institutions that are aimed at identifying corrupt activity.^[206]



The ages of Kiir's children, grandchildren, nieces, and nephews on the incorporation dates of companies they held shares in. Photo: The Sentry.

Foreign ownership

Foreigners can own businesses in South Sudan, but the 2012 Companies Act mandates that South Sudanese nationals hold at least 31% of the shares.^[211] While these requirements can support local South Sudanese economic interests, they can also create an advantage for companies with connections to the

political elite. The Sentry identified 70 companies with foreign shareholders in which members of the Kiir family also held shares.



Nationalities of foreigners who own shares in Kiir family companies. Photo: The Sentry.

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