

**Hon. John C. Demers**

Assistant Attorney General  
National Security Division  
U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, D.C. 20530-0001

28 June 2018

**Re: Complaint Alleging Adil Baguirov Has Failed to Register As a Foreign Agent Under the Foreign Agents Registration Act**

Dear Mr. Demers,

As Managing Director of the International Secretariat for the global anti-corruption organization Transparency International ("TI"), I write to submit this complaint alleging that Adil Baguirov, an American and Azerbaijan citizen residing in Dayton, Ohio, has acted as a foreign agent yet failed to register as such with the Department of Justice, in violation of the Foreign Agents Registration Act ("FARA" or "the Act"), 22 U.S.C. § 611 *et seq.* Accordingly, I respectfully request that the Department of Justice open an investigation into the activities of Adil Baguirov.

This complaint is based on information obtained following an extensive investigation conducted by the Organized Crime and Corruption Reporting Project ("OCCRP"). TI is in partnership with the OCCRP to undertake follow-up action on its grand corruption exposés. OCCRP's investigation raises red flags and questions that the Justice Department may be interested in having answered.

According to the United States Attorneys' Manual, FARA "requires that agents of foreign principals engaged in political or quasi-political activities register with the Attorney General unless exempt." See USAM 9-90.700. As further explained by the Criminal Resource Manual, the Act "covers most lobbying, advertising, public relations, and fundraising for 'foreign principals' as defined, that is not of a commercial nature, or performed by Embassy officials." See CRM at 2062. As outlined below, Mr. Baguirov has allegedly acted as an agent of the Government of Azerbaijan and appears to have engaged in activities of a political or quasi-political nature.

In support of this complaint, I kindly ask that you take note of the following:

- Beginning in 2012, a number of bank accounts, hidden behind shell companies, were used, among other things, to make payments to Azerbaijani agents working to influence American policy. The identities of the true beneficial owners of these paper companies, which show up in other money laundering cases, are not known. A Wyoming-based consulting company Baguirov runs, called Turbillion LLC, received a payment in 2013 of US\$ 253,150 from Hilux

Services, a shell firm that is part of the Azerbaijani Laundromat scheme as documented by OCCRP. The reason for the payment is listed, cryptically, “to the contract.” The payment was made at the time of his extensive attempts to influence American foreign policy and to advance the interests of Azerbaijan. I attach with this email a screen shot of the bank ledger that substantiates this bank wire payment, as provided by OCCRP to TI.

- Adil Baguirov runs a Houston-based non-profit, the U.S. Azeris Network (“USAN”), which describes itself as a “genuine grassroots advocacy and voter education network” for Azerbaijani-Americans and other Turkic Americans. Much of the activity of USAN, however, promotes the interests of Azerbaijan.
- From 2012 to 2014, USAN helped organize a series of three conferences meant to celebrate the U.S. – Azerbaijan relationship, with a focus on energy security, stability and regional cooperation. These conferences occurred at a critical time for Azerbaijan inasmuch as a consortium of major oil companies – including the State Oil Company of the Azerbaijani Republic (“SOCAR”), the National Iranian Oil Company, BP and Lukoil -- were seeking exemptions from U.S. sanctions imposed on Iran for the Southern Gas Corridor (“SGC”). The SGC is a \$28 billion pipeline project intended to supply Europe with gas from Azerbaijan’s vast Shah Deniz oil fields.
- One of these conferences, held in Azerbaijan's capital, Baku, was organized in May 2013 by USAN, and was attended by 11 members of Congress and more than 30 staffers. Eight of the 10 Members of Congress who attended the conference were members of Congress’ Azerbaijan Caucus. Upon their return to the United States, many of lawmakers promoted the SGC. Five days after the conference, President Obama issued an executive order further tightening sanctions on Iran. An investigation conducted by the Office of Congressional Ethics determined that SOCAR contributed \$750,000 to underwrite the trip. Just a few months after the conference, Adil Baguirov received \$253,150 from one or more of the secret bank accounts described above.
- Over the course of a decade, Adil Baguirov has repeatedly testified before the House of Representatives to recommend U.S. economic and military aid to Azerbaijan. In Congressional testimony he gave in 2013, Adil Baguirov requested \$26 million in aid from USAID and \$3.9 million in military aid for Azerbaijan, while calling for aid to Armenia – Azerbaijan’s rival over the disputed Nagorno-Karabakh region – to be reduced to zero.
- In 2013, in testimony before the House Appropriations Subcommittee on State, Foreign Operations and Related Matters, Adil Baguirov protested the State Department’s proposed budget for fiscal year 2014, claiming that “someone [had] “twisted and changed the spirit” of the United States’ “neutral” position between Azerbaijan and Armenia. Soon after providing this testimony, USAN publicly accused Armenia of providing the Committee with “false or

exaggerated information, whilst asking for tens of millions of dollars in taxpayers' money" though its "paid lobbyist."

- In July 2011, Azerbaijan President Aliyev awarded Adil Baguirov a medal for strengthening the relationship between the United States and Azerbaijan.
- Adil Baguirov appears to have never registered as a foreign agent with the Department of Justice.

In light of the above, all published by the OCCRP on 23 May 2018 at <https://www.occrp.org/en/azerbajjanilaundromat/bakus-man-in-america>, I believe the allegations are sufficient to warrant an investigation into the relationship between the Government of Azerbaijan and Adil Baguirov, and specifically whether his lobbying work necessitated his registering as a foreign agent with the Department of Justice.

Please do not hesitate to contact me if you have any questions.

Yours sincerely,



Patricia Moreira  
Managing Director