

10TH DECEMBER 2023

Nadia Zahmoul

Subject: Urgent Need for Cryptocurrency Legal Guidance in High Court Family Division (part 1/2)
Date: Sunday, December 10, 2023 at 12:30:47 PM Mountain Standard Time
From: Nadia <nadia@rosekross.com>
To: Allan, Samuel (Judicial Office) <Samuel.Allan@judiciary.uk>
Attachments: RE: Request for guidance - cryptocurrency case in High Court.eml, Draft Instruction David Spens KC.docx, CONFIDENTIAL REFERRAL PART 1 OF 3_DS.pdf, Expert Report (12-4-2023) Draft.pdf

10 December 2023

Re case BV20D01752

Dear Sam,

I hope you are well. I wrote in October regarding a case currently in High Court involving significant undisclosed cryptocurrency assets and revenues streams.

The complexities of the cryptocurrency assets in this case stem from the respondent's asymmetrical knowledge of blockchain-based assets, his refusal to provide the most basic disclosures, the complete lack of knowledge of the Court, and the absence of legal and regulatory guidance. The Family Court does not have guidelines for what constitutes proper disclosure requirements for cryptocurrency assets and is thus unable to determine if disclosures are deficient and order the respondent to provide proper disclosures.

In your email of 20 October 2023, you wrote that you would pass on my email to the officials in Family Division and in the Master of the Rolls team so that the wider points I raise can be considered.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Criminal Investigation: Money Laundering using Cryptocurrency.

Documents held in Imerman by the respondent's solicitors lost their confidentiality status when the respondent transferred them to me via Signal messenger on 6 May 2021. Per his own documents the respondent managed the books and records for [REDACTED] - his then-mistress - prostitution services with knowledge regarding the criminalization of prostitution in Dubai. In view of the respondent's professional background, status as a sophisticated investor and registration with the FCA, the respondent knew or should have known that disguising the true source of the funds generated by [REDACTED] prostitution enterprise and concealing their true source of funds constituted a criminal act in the UK under the Sexual Offences Act of 2003 and Modern Slavery Act of 2015. Had the respondent not known that said funds constituted criminal property, the respondent would not have gone through the lengths necessary to launder the proceeds of [REDACTED] prostitution enterprise in the manners described in the attached referral, using cryptocurrency.

New York Southern District Ongoing Criminal Investigation

The respondent is currently under criminal investigation by the Southern District of New York for laundering of criminal property derived from prostitution. The team at Southern District in charge of this investigation has a special interest in cryptocurrency laundering. I traveled to New York in September 2023 to meet with the SDNY special agents in charge with the investigation and I can provide their contact details to the UK Justice department if necessary.

UK Nexus

The respondent's overt acts related to the (i) laundering of criminal property derived from [REDACTED] prostitution enterprise and (ii) the fraudulent dissipation of marital assets intended to deprive me of an equitable financial remedy constitute criminal activity under [Part 7 of Proceeds of Crime Act 2002](#) ('POCA') Money Laundering Offenses and the Fraud Act of 2006. [REDACTED]

In the context of these proceedings, trusting the party who is hiding significant crypto assets and has a proven track record of non-disclosures to write the Letter of Instructions for the crypto expert is not acceptable. The Court's approval of the respondent's draft Letter of Instructions for the crypto single joint expert is wrong and will without doubt result in unfair and unequitable proceedings for me.

Not only is the respondent's LOI which was approved by the Court over mine, self-serving, it is also extremely deficient and for this reason I am requesting one more time the urgent intervention and input from the Master of the Rolls team. The Family Court urgently needs legal guidance in cryptocurrency in order to be able to determine what constitutes a proper disclosure and in order to make sure there is no abuse of process.

[REDACTED]

[REDACTED]

[REDACTED]

Conclusion

I am making an urgent request to the Master of the Rolls team to please provide the High Court Family Division with expert support for the remainder of these proceedings.

I accept there is a lag between the emergence of a new financial asset class based on a novel blockchain technology, and the legal system. However, I do not accept to be a victim of the judiciary's learning curve. I am urging you to please provide the High Court with expert support for this case. The court's lack of knowledge in crypto is helping the respondent continue to hide his criminal activities and is aiding his manipulation of the court proceedings.

The approval of the respondent's Letter of Instructions for the crypto expert will give the respondent the tools to control the crypto process through the end of the proceedings. and continue his manipulation of the court process. The Master of the Rolls team must please provide urgent expertise and guidance to the Family Division.

The respondent [REDACTED]

[REDACTED] and he is under investigation by SDNY for money laundering of proceeds from prostitution activities using cryptocurrency.

[REDACTED]

With kind wishes,

Nadia Zahmoul

[REDACTED]

[REDACTED]

[REDACTED]

Nadia Zahmoul

Subject: Urgent Need for Cryptocurrency Legal Guidance in High Court Family Division (part 2/2)
Date: Sunday, December 10, 2023 at 12:36:22 PM Mountain Standard Time
From: Nadia <nadia@rosekross.com>
To: Allan, Samuel (Judicial Office) <Samuel.Allan@judiciary.uk>
Attachments: CONFIDENTIAL REFERRAL PART 2 OF 3_DS.pdf, CONFIDENTIAL REFERRAL PART 3 OF 3_DS.pdf

Dear Sam,

Please find attached part 2 of the criminal referral.

With kind wishes,

Nadia

Veritas Numquam Perit

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