

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION – ADMINISTRATIVE COURT

NADIA ZAHMOUL — CLAIMANT

v.

SECRETARY OF STATE FOR JUSTICE & OTHERS — DEFENDANTS

N461 & N463 URGENT APPLICATION BUNDLE

ADMINISTRATIVE COURT — INDEX OF DOCUMENTS

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, MoJ; Chief Executive, HMCTS

Form: N461 — Judicial Review

Urgent Application: N463

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KING'S BENCH DIVISION – ADMINISTRATIVE COURT

NADIA ZAHMOUL — CLAIMANT

v.

SECRETARY OF STATE FOR JUSTICE & OTHERS — DEFENDANTS

N461 FORM

Judicial Review

Claim form

For Court use only

Name of court

High Court of Justice
Administrative Court

Reference number

Date

Day

Month

Year

Help with fees reference number

H W F - -

The rules relating to applications for Judicial Review are contained in CPR Part 54, and Practice Directions 54A – D. Search for the CPR on www.justice.gov.uk.

SEAL

Time Limit for filing a claim

A claim form must be filed promptly, and in any event **not later than 3 months** after the grounds to make the claim first arose: see CPR54.5(1).

Note: If there is more than one claimant, set out the details required by questions 1, 1.1 and 1.2 on a separate sheet, marking that sheet so that it is clear it relates to this part of the claim form.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]						
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[REDACTED]

Email (if you have one)

- 1.1** Claimant or claimant's legal representative's address to which documents should be sent.

Name of claimant or claimant's legal representative's

Name of firm (if applicable)

Address for service

Building and street

Second line of address

Town or city

County (optional)

Postcode

Phone number

Email

Reference number (if applicable)

Note 1.1: CPR 6.23 requires each party to proceedings to provide an address for service which must be an address in the United Kingdom. Communication concerning the claim is sent to this address. If a solicitor or legal representative acts for you, give that address (if in the United Kingdom). If not, provide an address to which communication concerning this claim should be sent.

1.2 Claimant's Counsel's details

First name(s)

Last name

Address

Building and street

Second line of address

Town or city

County (optional)

Postcode

Phone number

Email

1.3 1st Defendant's name

1.4 Defendant or (where known) Defendant's legal representative's address to which documents should be sent.

Address

Building and street

Second line of address

Town or city

County (optional)

Postcode

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Phone number

Email

Reference number (if known)

1.5 2nd Defendant's name

1.6 Defendant's or (where known) Defendant's legal representative's address to which documents should be sent.

Address

Building and street

Second line of address

Town or city

County (optional)

Postcode

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Phone number

Email

Reference number (if applicable)

Section 2 – Interested parties

2.1 Interested party

Name

Organisation (if applicable)

Address

Building and street

Second line of address

Town or city

County (optional)

Postcode

Phone number

Email

Reference number (if applicable)

Note 2: An Interested Party is someone other than a defendant who is directly affected by the claim.

Where the claim for judicial review relates to proceedings in a court or tribunal, any other parties to those proceedings must be named in the claim form as interested parties. Full details of interested parties must be included in the claim form. For example, if you were a defendant in a criminal case in the Magistrates or Crown Court and are making a claim for judicial review of a decision in that case, the prosecution must be named as an interested party. In a claim which does not relate to a decision of a court or tribunal, you should give details of any persons directly affected by the decision you wish to challenge.

If you consider there is more than one interested party, set out their details on a separate sheet, marking that sheet so that it is clear it relates to this part of the claim form.

Section 3 – Details of the decision to be judicially reviewed

3.1 Give details of the decision you seek to have judicially reviewed.

Note 3.1: Use a separate sheet if you need more space for your answers, marking clearly which section the information refers to.

3.2 Date of decision

Day

Month

Year

3.3 Name and address of the court, tribunal, person or body who made the decision to be reviewed.

Name

Address

Building and street

Second line of address

Town or city

County (optional)

Postcode

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Section 4 – Permission to proceed with a claim for judicial review

This section must be completed. You must answer all the questions and give further details where required.

4.1 I am seeking permission to proceed with my claim for Judicial Review.

Is this application being made under the terms of paragraph 17 Practice Direction 54A (Challenging removal)?

- Yes
- No

4.2 Does your claim, or any interlocutory application, for example for interim relief or expedition, need to be decided urgently – i.e. within 7 days?

- Yes. Complete form **N463** and file this with your application.
- No

4.3 Are you making any non-urgent interlocutory applications?

- Yes. Complete Section 9.
- No

4.4 Does any part of the claim allege a breach of Convention rights protected under the Human Rights Act?

- Yes. Identify the Convention rights you contend have been breached in the box below

- No

4.5 Have you complied with the pre-action protocol?

Note 4.5: See Practice Direction 54C.

- Yes
- No. Give reasons for non-compliance in the box below.

4.6 Have you filed this claim in the region with which the claim is most closely connected?

- Yes. Give any additional reasons for wanting it to be dealt with in this region in the box below
- No. Give reasons in the box below

4.7 Is the claimant in receipt of a Civil Legal Aid Certificate?

- Yes
- No

Section 5 – Statement of facts relied on

- set out below
- attached

Note 5: Set out the facts on which your claim is based: see Practice Direction 54A, paragraph 4.2. Use separate sheets if you need more space; mark the sheets so that it is clear they relate to this section of the claim form.

Section 6 – Detailed statement of grounds

6.1 The detailed statement of grounds are:

- set out below
- attached

Note 6: Set out each ground of challenge: see Practice Direction 54A at paragraph 4.2. Use separate sheets if you need more space; mark the sheets so that it is clear they relate to this section of the claim form.

Section 7 – Aarhus Convention claim

7.1 Is this claim an Aarhus Convention claim

Yes. Give reasons why in the box below.

Note 7: For the definition of an Aarhus claim, see CPR 45.41. The cost limit provisions are at CPR 45.43 – 44.

No

7.2 Do you wish the court to vary or remove the limits on costs recoverable from a party?

Yes. Give reasons why in the box below.

No

Section 8 – Details of remedy (including any interim remedy) being sought

Note 8: State precisely the terms of the order you ask the court to make. The available remedies are at CPR 54.2 – 3. The court may make any/all of the following orders:

- (a) a mandatory order;
- (b) a prohibiting order;
- (c) a quashing order; or
- (d) an injunction restraining a person from acting in any office in which he is not entitled to act.

A claim for damages may be included but only if you are seeking one of the orders set out above.

Section 9 – Other applications (non-urgent)

9.1 I wish to make the following applications for directions and/or interlocutory orders:

Note 9: If you wish to make any interlocutory application now, set out the application and the reasons and/or evidence relied on in support of it in this Section. Use separate sheets if you need more space; mark the sheets so that it is clear they relate to this section of the claim form.

If, after this claim form has been filed, you wish to make an interlocutory application, use form N244.

Section 10 – Supporting documents

The Claim Form must include or be accompanied by certain documents:
see Practice Direction 54A, paragraph 4.4(1) – (2).

Please complete the checklist below

- 10.1** Statement of Facts
- 10.2** Statement of Grounds
- 10.3** Any written evidence relied on in support of the claim.
- 10.4** Any written evidence in support of any other application contained in the claim form
- 10.5** If the claim seeks to have any order quashed, a copy of the order.
- 10.6** If the claim for judicial review is directed to a decision of a public authority, a copy of the decision challenged.
- 10.7** If the claim for judicial review is directed to the decision of a court or tribunal, an approved copy of the reasons for the decision.
- 10.8** Copies of any documents relied on.
- 10.9** A copy of any statutory material relevant to the claim.
- 10.10** A list of essential documents for advance reading by the court.
- 10.11** If paragraph 17 of Practice Direction 54A applies to the claim, copies of the documents specified at paragraph 17.2(1) (a) – (d).

If it has not been possible to file any of the above documents, state the reason why the document is not available.

Reasons why you have not supplied a document and date when you expect it to be available:-

- 10.12** If you contend the claim is an Aarhus Convention claim, the financial information required by CPR 45.42.
- 10.13** A copy of the legal aid or Civil Legal Aid certificate (if applicable)

Statement of truth

I understand that proceedings for contempt of court may be brought against a person who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

- I believe** that the facts stated in this form are true.
- The claimant** believes that the facts stated in this form are true. **I am authorised** by the claimant to sign this statement.

Signature

Nadia Zahmouli

Nadia Zahmouli

- Claimant
- Litigation friend
- Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day Month Year

Full name

If claimant's legal representative, state name and firm

If signing on behalf of firm or company give position or office held

The Court and venue

CPR part 54 – claims for Judicial Review are dealt with by the Administrative Court.

The general expectation is that proceedings will be administered and determined in the region with which the claim has closest connection; see Practice Direction 54C paragraph 2.5.

- Where the claim is proceeding in the Administrative Court in **London**, documents must be filed in the Administrative Court Office, Issues and Enquiries, Royal Courts of Justice, Strand, London, WC2A 2LL.
- Where the claim is proceeding in the Administrative Court in **Birmingham**, documents must be filed in the Administrative Court Office, Birmingham Civil Justice Centre, Priory Courts, 33 BullStreet, Birmingham B4 6DS.
- Where the claim is proceeding in the Administrative Court in **Wales**, documents must be filed in the Administrative Court Office, Cardiff Civil Justice Centre, 2 Park Street, Cardiff, CF10 1ET.
- Where the claim is proceeding in the Administrative Court in **Leeds**, documents must be filed in the Administrative Court Office, Leeds Combined Court Centre, 1 Oxford Row, Leeds, LS1 3BG.
- Where the claim is proceeding in the Administrative Court in **Manchester**, documents must be filed in the Administrative Court Office, Manchester Civil Justice Centre, 1 Bridge Street West, Manchester, M3 3FX.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION – ADMINISTRATIVE COURT

NADIA ZAHMOUL — CLAIMANT

v.

SECRETARY OF STATE FOR JUSTICE & OTHERS — DEFENDANTS

N461 CONTINUATION SHEETS

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N461 – Continuation Sheet

Section: Section 3— DETAILS OF THE DECISION TO BE JUDICIALLY REVIEWED

CONTINUATION SHEET - FORM N461

SECTION 3 — DETAILS OF THE DECISION TO BE JUDICIALLY REVIEWED
(CONTINUATION SHEET)

3.1 — The decision challenged

The Claimant challenges a series of unlawful administrative acts and omissions by HM Courts & Tribunals Service (HMCTS) and the Ministry of Justice (MoJ) between February 2024 and November 2025, namely:

- a) Failure to log, process, acknowledge, escalate, or safeguard criminal evidence submitted to HMCTS/MoJ on multiple occasions (February 2024 – May 2025).
- b) Failure to preserve or safeguard the “Imerman devices” (MacBook Pro and Ubuntu), including loss of chain of custody and failure to carry out any forensic review (2021–2025).

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N461 – Continuation Sheet

Section: Section 3– DETAILS OF THE DECISION TO BE JUDICIALLY REVIEWED

- c) Unlawful administrative withdrawal of Part 3A participation measures granted during trial (19–28 February 2024), without hearing, without order, without reasons, and without judicial determination, and contrary to HMCTS's own public sector equality duties.
- d) Failure to comply with statutory equality obligations, including:
- e) failure to conduct any Public Sector Equality Duty (PSED) assessment,
- f) failure to record or consider the Claimant's disability (Autism + PTSD),
- g) failure to provide reasonable adjustments,
- h) failure to maintain a disability file-note or safeguarding record.
- i) Failure to respond to the Claimant's Pre-Action Protocol Letter dated 19 November 2025, contrary to the Pre-Action Protocol for Judicial Review.
- j) Misclassification by HMCTS (letter dated 14 November 2025) incorrectly asserting that the above matters were “judicial” and therefore not administratively reviewable — itself an unlawful administrative stance and a reviewable error of law.

These failures amount to reviewable administrative decisions, not judicial ones, because no judge made any determination, order, or reasoned decision on these issues.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N461 – Continuation Sheet

Section: Section 3—*DETAILS OF THE DECISION TO BE JUDICIALLY REVIEWED*

3.2 — Date(s) of the decisions

Because the challenged conduct consists of a continuing course of unlawful administrative behaviour, the relevant dates are:

- 8 February 2024 — criminal evidence submitted to the SJE (unlogged).
- 11 April 2024 — criminal evidence submitted to MoJ/HMCTS (unlogged).
- 19–28 February 2024 — Part 3A measures granted during trial.
- March–April 2024 — measures disappear without hearing or order.
- 12 May 2025 — further criminal evidence transmitted to MoJ/HMCTS (unlogged).
- 31 October 2025 — Stage 3 escalation (unlogged).
- 14 November 2025 — HMCTS misclassification letter (administrative error).
- 19 November 2025 — PAP letter served (ignored).
- 24 November 2025 — PAP deadline (missed).
- Continuing — ongoing failure to safeguard evidence or comply with PSED.

This constitutes a continuing administrative breach, and the latest date for limitation purposes is ongoing.

3.3 — Person or body making the decision

The decisions and failures were made by:

3

N461 – Continuation Sheet – Section 3

Claimant: Nadia Zahmoul

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: *Nadia Zahmoul*

Defendants: *Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS*

Claim No.: *[leave blank — Court will assign]*

Form: *N461 – Continuation Sheet*

Section: *Section 3—DETAILS OF THE DECISION TO BE JUDICIALLY REVIEWED*

1. HM Courts & Tribunals Service (HMCTS)

Chief Executive

102 Petty France

London SW1H 9AJ

2. Ministry of Justice (MoJ)

Permanent Secretary

102 Petty France

London SW1H 9AJ

3. Secretary of State for Justice

Ministry of Justice

102 Petty France

London SW1H 9AJ

These bodies are responsible for the administrative acts and omissions challenged.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: *Nadia Zahmoul*

Defendants: *Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS*

Claim No.: *[leave blank — Court will assign]*

Form: *N461 – Continuation Sheet*

Section: *Section 3– DETAILS OF THE DECISION TO BE JUDICIALLY REVIEWED*

No judge is named because no judicial decision exists on the matters under review.

IN THE HIGH COURT OF JUSTICE
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Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N461 – Continuation Sheet

Section: Section 4—PERMISSION TO PROCEED WITH A CLAIM FOR JUDICIAL REVIEW

CONTINUATION SHEET - FORM N461

SECTION 4 — PERMISSION TO PROCEED WITH A CLAIM FOR JUDICIAL REVIEW

4.1 I am seeking permission to proceed with my claim for Judicial Review.

Is this application being made under the terms of paragraph 17 PD54A (Challenging Removal)?

No.

This claim does not fall within PD54A paragraph 17 (Challenging Removal).

It concerns administrative unlawfulness by HMCTS/MoJ, not removal directions.

This claim does **not** fall under paragraph 17 PD54A. It does not concern removal directions or immigration detention.

It concerns **administrative failings by HMCTS and the Ministry of Justice**, including:

- failure to log, process, or safeguard evidence,
- unlawful withdrawal of participation measures,
- breaches of the Public Sector Equality Duty,
- and associated procedural unfairness.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: *Nadia Zahmoul*

Defendants: *Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS*

Claim No.: *[leave blank — Court will assign]*

Form: *N461 – Continuation Sheet*

Section: *Section 4– PERMISSION TO PROCEED WITH A CLAIM FOR JUDICIAL REVIEW*

4.2 Does your claim, or any interlocutory application (e.g., interim relief or expedition), need to be decided urgently – i.e. within 7 days?

The Claimant has filed **form N463** seeking urgent consideration. **Yes.**

An urgent listing is required due to:

- safeguarding risks,
- the Claimant's disability-related inability to participate safely in paper-only procedures,
- the need to preserve and secure material evidence,
- loss of chain of custody of criminal evidence,
- the Defendants' failure to comply with the Pre-Action Protocol deadline.
- and the Defendants' continued administrative silence.

4.3 Are you making any non-urgent interlocutory applications?

No.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N461 – Continuation Sheet

Section: Section 4– PERMISSION TO PROCEED WITH A CLAIM FOR JUDICIAL REVIEW

4.4 Does any part of the claim allege a breach of Convention rights protected under the Human Rights Act?

Answer:

Yes.

The claim alleges breaches of:

- **Article 6 ECHR** (right to a fair hearing), through procedural unfairness, administrative suppression of evidence, and withdrawal of participation measures without due process;
- **Article 14 ECHR** (non-discrimination), in conjunction with Article 6, due to disability-based disadvantage and HMCTS/MoJ failure to make reasonable adjustments.

4.6 Have you filed this claim in the region with which the claim is most closely connected?

Yes.

The claim is filed in the Administrative Court, London, which is the correct region because:

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: *Nadia Zahmoul*

Defendants: *Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS*

Claim No.: *[leave blank — Court will assign]*

Form: *N461 – Continuation Sheet*

Section: *Section 4— PERMISSION TO PROCEED WITH A CLAIM FOR JUDICIAL REVIEW*

all relevant HMCTS/MoJ administrative actions were taken centrally in London;
the underlying proceedings were conducted in the High Court (Family Division, London);
and the Defendants (MoJ / HMCTS senior officials) are based in London.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N461 – Continuation Sheet

Section: Section 5– STATEMENT OF FACTS RELIED ON

CONTINUATION SHEET - FORM N461

SECTION 5: STATEMENT OF FACTS RELIED ON

1. I, the Claimant, repeatedly submitted serious criminal evidence to HMCTS, the Ministry of Justice, and other senior public bodies between February 2024 and May 2025. None of these submissions were logged, acknowledged, escalated, or safeguarded.

2. The criminal evidence included source-level material relating to suspected money laundering, cryptocurrency movements, prostitution-linked financial activity, and other indicators of organised crime. This material originated from the “Imerman devices” (a MacBook Pro and Ubuntu computer) and associated documentation.

3. On 8 February 2024, I transmitted Criminal Referrals (Parts 1–3) and supporting source material to the court-appointed Single Joint Expert (SJE). No acknowledgement, logging, or safeguarding action followed.

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Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N461 – Continuation Sheet

Section: Section 5– STATEMENT OF FACTS RELIED ON

4. On 11 April 2024, I transmitted the Criminal Referrals (Parts 1–3) to the Secretary of State for Justice, HMCTS, the Ministry of Justice, and senior judicial administrative offices. Again, there was no logging, escalation, safeguarding assessment, or record of receipt.
5. On 12 May 2025, I transmitted Section C (Criminal Activities: Money Laundering of Prostitution Proceeds) to the Court of Appeal, House of Lords, Members of Parliament, the Cabinet Office, HMCTS, and the Ministry of Justice. None of the Defendants logged or responded to this material.
6. Throughout 2021–2025, HMCTS and the Ministry of Justice were repeatedly notified that the Imberman devices contained criminal evidence and required forensic safeguarding. No chain of custody was recorded. No forensic review was ever undertaken. No administrative safeguarding measures were put in place.
7. During the trial (19–28 February 2024), I was granted participation measures under FPR Part 3A due to Autism and PTSD. After the trial, these measures were withdrawn without hearing, order, reasons, or judicial determination. HMCTS later asserted (14 November 2025) that this was a “judicial matter”, but no judicial act ever occurred. This demonstrates an administrative failure and misclassification.

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Form: N461 – Continuation Sheet

Section: Section 5– STATEMENT OF FACTS RELIED ON

8. HMCTS's letter of 14 November 2025 confirms the following:

- they did not log or review the evidence submitted;
- they never assessed safeguarding risk;
- they misclassified multiple administrative acts as “judicial”;
- they did not consider or record any Equality Act or PSED duties.

This letter materially strengthens the claim because it evidences the administrative omissions complained of.

9. I have Autism Spectrum Condition and PTSD. My clinical assessment (CLAAS, 1 July 2025) confirms that administrative silence and opaque procedures severely impair my ability to participate and pose a safeguarding risk. HMCTS/MoJ failed to consider or record these needs, contrary to Equality Act and PSED duties.

10. IRS:CI (United States) confirmed that the criminal evidence forms part of a federal investigation. HMCTS/MoJ took no steps to preserve or secure the material, despite being notified.

11. The cumulative effect of the administrative failures—non-logging, non-acknowledgement, disappearance of participation measures, loss of chain of custody, and absence of

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Claim No.: *[leave blank — Court will assign]*

Form: *N461 – Continuation Sheet*

Section: *Section 5– STATEMENT OF FACTS RELIED ON*

safeguarding—has caused severe prejudice to me as a disabled litigant and compromised the integrity of the evidence.

- 12. These matters concern administrative omissions, not judicial decisions, and therefore fall squarely within the jurisdiction of the Administrative Court.**

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Claim No.: [leave blank — Court will assign]

Form: N463 – Continuation Sheet

Section: Section 6- CONCISE STATEMENT OF GROUNDS

CONTINUATION SHEET — FORM N461

SECTION 6– CONCISE STATEMENT OF GROUNDS

6.1 Factual and legal grounds relied on

1. Immediate safeguarding risk arising from administrative failures

The Defendants (HMCTS and MoJ) have failed to log, acknowledge, preserve, or escalate serious criminal evidence repeatedly submitted between February 2024 and May 2025. They have also failed to safeguard the Imerman devices, which contain source-level criminal material. This creates an ongoing and immediate risk to the integrity of evidence relevant to UK and foreign law-enforcement bodies (IRS:CI). Urgent intervention is required to prevent further loss or tampering.

2. Imminent risk of prejudice to the Claimant as a disabled litigant (Autism + PTSD)

The Claimant cannot safely participate in a paper-only process. The Equality Act 2010 and the Public Sector Equality Duty (s.149) require HMCTS to make reasonable adjustments, ensure participation, and avoid processes that exacerbate disability-related harm. Administrative silence and paper-based decisions have already caused deterioration and procedural prejudice (see CA refusal of 4 August 2025).

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Form: N463 – Continuation Sheet

Section: Section 6- CONCISE STATEMENT OF GROUNDS

A paper-only listing would violate **Article 6 ECHR and the Equality Act.**

3. Breach of duty to safeguard evidence and maintain chain of custody

The Defendants were on notice that the Imerman devices and associated evidence contained indicators of serious crime, including prostitution proceeds, money laundering structures, Xero bookkeeping, BTC cluster data, and other forensic material. Despite this, they took no steps to preserve chain of custody.

Urgent orders are required to prevent further administrative degradation of evidence.

4. The Defendants have failed to respond to the PAP

The Pre-Action Protocol letter of **19 November 2025** expressly required a response by 16:00 on **24 November 2025**. No acknowledgment or response was received from any Defendant.

This silence increases the urgency: without a prompt judicial response, the case risks becoming unmanageable due to ongoing administrative suppression.

5. Necessity of urgent oral determination due to risk of further administrative suppression

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Form: N463 – Continuation Sheet

Section: Section 6- CONCISE STATEMENT OF GROUNDS

The subject matter includes evidence of criminality, failures of evidence-handling, and systemic administrative non-compliance. These issues cannot safely be adjudicated on the papers.

Only an urgent oral hearing ensures transparency and prevents further mishandling of sensitive material.

6. Urgent interim relief is required to preserve evidence and prevent further administrative failures

Without immediate mandatory orders—preservation, disclosure of evidence-handling logs, chain-of-custody reconstruction, and safeguarding measures—the Court's eventual jurisdiction may be undermined. Delay risks irreparable loss of material evidence and further Equality Act breaches.

7. The matter is suitable for urgent listing within 7 days

The facts raise issues of:

- safeguarding of criminal material,
- disability discrimination,
- administrative-law failures by major public authorities, and

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Form: N463 – Continuation Sheet

Section: Section 6- CONCISE STATEMENT OF GROUNDS

- potential interference with foreign criminal investigations.

These justify urgent judicial control and immediate listing.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N463 – Continuation Sheet

Section: Section 8 – DETAILS OF REMEDY (INCLUDING ANY INTERIM REMEDY) BEING SOUGHT

CONTINUATION SHEET — FORM N461

SECTION 8 – DETAILS OF REMEDY (INCLUDING ANY INTERIM REMEDY) BEING SOUGHT

8.1 Relief sought by way of final order

The Claimant seeks the following remedies pursuant to the Senior Courts Act 1981, CPR Part 54 and the Court's supervisory jurisdiction:

(1) Declarations of unlawfulness that the Defendants (HMCTS and the Ministry of Justice) acted unlawfully by:

- a) failing to log, record, process, safeguard, escalate, or acknowledge the Claimant's submissions containing serious criminal evidence;
- b) failing to safeguard or preserve the Imerman devices containing source-level criminal material, resulting in a loss of chain of custody;
- c) unlawfully withdrawing Part 3A participation measures without hearing, order, reasons, procedural fairness, or judicial act;

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N463 – Continuation Sheet

Section: Section 8 – DETAILS OF REMEDY (INCLUDING ANY INTERIM REMEDY) BEING SOUGHT

- d) failing to comply with the Public Sector Equality Duty under s.149 Equality Act 2010;
- e) failing to provide reasonable adjustments to the Claimant as a disabled court user (Autism + PTSD);
- f) misclassifying administrative acts as “judicial” in correspondence dated 14 November 2025, thereby frustrating the Claimant’s statutory rights and preventing administrative remedy.

(2) Mandatory orders requiring the Defendants to:

- a) take immediate steps to identify, preserve, and secure all digital and documentary material relating to the Imerman devices, including all correspondence, internal emails, logs, and case-handling records;
- b) disclose all internal communications, safeguarding assessments, evidence-handling logs, and chain-of-custody records concerning the Claimant’s submissions between February 2024 and May 2025;
- c) reconstruct, insofar as possible, the evidence-handling trail relating to the Claimant’s submissions;

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N463 – Continuation Sheet

Section: Section 8 – DETAILS OF REMEDY (INCLUDING ANY INTERIM REMEDY) BEING SOUGHT

- d) conduct and file with the Court a retrospective PSED analysis of all administrative acts complained of within 14 days;
- e) implement appropriate disability-adjusted measures to ensure the Claimant's participation in all future stages of these proceedings.

(3) An order requiring the Defendants to comply in full with the public-law distinction between judicial and non-judicial acts and to confirm, in writing, that all non-judicial operational decisions relevant to this claim have been disclosed.

8.2 Interim relief sought (urgent)

The Claimant also seeks the following interim remedies:

1. An urgent preservation order requiring the Defendants to take immediate steps to secure and preserve:

- all Imerman-related evidence;
- all HMCTS/MoJ digital and documentary records relating to receipt, handling, or suppression of the evidence;

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N463 – Continuation Sheet

Section: Section 8 – DETAILS OF REMEDY (INCLUDING ANY INTERIM REMEDY) BEING SOUGHT

- all internal emails, logs, or communications relating to the Claimant or her submissions.

2. An order for urgent disclosure of:

- any existing logs, records, or chain-of-custody materials;
- any safeguarding assessments (or confirmation that none were carried out).

3. An order abridging time for the Defendants' Acknowledgment of Service to 7 days.

4. An order for an urgent oral permission hearing, within 7 days, or a rolled-up hearing if appropriate.

5. A direction that no part of this application or the permission decision may be made on the papers due to the Claimant's Autism Spectrum Condition, as supported by medical evidence, and in compliance with:

- the Equality Act 2010,
- the Public Sector Equality Duty,
- Article 6 ECHR,

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N463 – Continuation Sheet

Section: Section 8 – DETAILS OF REMEDY (INCLUDING ANY INTERIM REMEDY) BEING SOUGHT

- the Claimant's clinical evidence (CLAAS report, 1 July 2025; medical certificate 25 November 2025).

8.3 Why this relief is necessary

These remedies are required because:

- the Defendants have failed to safeguard evidence;
- the chain of custody for source-level criminal material has been lost;
- the Claimant cannot safely participate without urgent adjustments;
- the Defendants failed to respond to the PAP;
- further delay risks irreparable harm, further suppression of evidence, and worsening disability-related injury.

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION – ADMINISTRATIVE COURT

NADIA ZAHMOUL — CLAIMANT

v.

SECRETARY OF STATE FOR JUSTICE & OTHERS — DEFENDANTS

N463 URGENT APPLICATION FORM

Judicial Review

Application for urgent consideration

Name of court

High Court of Justice
Administrative Court

Claim number

Fee account number

Help with fees reference number
(if applicable)

H W F – –

Name of claimant (including any reference)

Complete this form if your application is urgent – i.e.
it must be considered within 7 days.

The claimant or the claimant's solicitors must serve
this form on the defendant(s) and any interested
parties, together with the **N461** judicial review claim
form (if not already served).

Name of defendant

Interested parties

If you do not complete this form correctly, it may
be rejected by the Administrative Court Office.

Date

Day

Month

Year

To the Defendant(s) and Interested Party(ies)

Representations in response to this application
may be made by any defendant or interested party,
by email to the relevant Administrative Office. See
details on last page.

You must complete sections 1 to 5 and attach a draft order.

Section 1 – Reasons for urgency

Section 2 – Justification for request for urgent consideration

- 2.1** Date and time when it was first appreciated that an urgent application might be necessary.

Day Month Year

Time

- 2.2** Please provide reasons for any delay in making the application.

- 2.3** What efforts have been made to put the defendant and any interested party on notice of the application?

Section 3 – Proposed timetable

3.1 How quickly do you require the application (form **N463**) to be considered?

within 3 days

indicate in hours (eg. 2 hours, 24 hours etc.)

hours

Note 3: This will determine the time within which your application is referred for consideration.

Applications which do not need to be considered within 7 days should be made using form **N244**.

3 – 6 days

indicate in days (eg. 4 days, 6 days etc.)

days

3.2 Please specify the nature and timeframe of consideration sought.

Interim relief is sought and the application for such relief should be considered within

days

hours

Abridgement of time for AOS is sought and should be considered within

days

hours

The N461 application for permission should be considered within

days

hours

If permission for judicial review is granted, a substantive hearing is sought by

Day

Month

Year

Other interlocutory directions are sought and the application should be considered within

days

hours

Section 4 – Grounds for Application

- 4.1** Set out the factual and/or legal grounds relied on in support of your application

Section 5 – Interim relief/directions and draft order

- 5.1** A draft order must be attached, which sets out the order the court is invited to make
- 5.2** State what interim relief and/or directions are sought and why

Section 6 – Service

A copy of this form of application was served on the defendant(s) and interested parties as follows:

Defendant

by handing it to or leaving it with

by e-mail to

Date served

Day Month Year

Interested party

by handing it to or leaving it with

by e-mail to

Date served

Day Month Year

Statement of truth

I understand that proceedings for contempt of court may be brought against a person who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

- I believe** that the facts stated in this form are true. I confirm that all relevant facts have been disclosed in this application.
- The claimant** believes that the facts stated in this form are true, and confirms that all relevant facts have been disclosed in this application. **I am authorised** by the claimant to sign this statement.

Signature

Nadia Zahmouli

- Claimant
- Litigation friend
- Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day Month Year

What you do next

Send your completed form and draft order to the court where your case is proceeding:

London

email: immediates@administrativecourtoffice.justice.gov.uk

Birmingham

email: birmingham@administrativecourtoffice.justice.gov.uk

Cardiff

email: cardiff@administrativecourtoffice.justice.gov.uk

Leeds

email: leeds@administrativecourtoffice.justice.gov.uk

Manchester

email: manchester@administrativecourtoffice.justice.gov.uk

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: <https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION – ADMINISTRATIVE COURT

NADIA ZAHMOUL — CLAIMANT

v.

SECRETARY OF STATE FOR JUSTICE & OTHERS — DEFENDANTS

N463 CONTINUATION SHEETS

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N463 – Continuation Sheet

Section: Section 1– Reasons for Urgency

CONTINUATION SHEET - FORM N463

SECTION 1- REASONS FOR URGENCY (CONTINUATION SHEET)

1. **This application is urgent** because the Defendants failed to comply with the Pre-Action Protocol deadline of **16:00 on 24 November 2025**. No acknowledgment or response was provided. **Their silence significantly escalates the safeguarding risk**, given the nature of the criminal evidence involved.

2. The Claimant has Autism Spectrum Condition and PTSD, as confirmed by the **Central London Adult Autism Service (CLAAS)**. CLAAS confirms that:
 - “*Without reasonable adaptations, autistic individuals are at a disadvantage and unable to participate equitably; they cannot communicate effectively in settings such as court proceedings.*”

 - “*Nadia has reported significant distress following the recent withdrawal of previously granted accommodations in court, which has impacted her ability to express herself effectively.*”

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N463 – Continuation Sheet

Section: Section 1– Reasons for Urgency

3. The **unlawful withdrawal of Part 3A** participation measures after the trial (19–28 February 2024) — **without hearing, order, reasons, or judicial determination** — created a procedural environment in **which a paper-only consideration would be clinically unsafe and legally improper.**

4. Urgency arises because the Defendants' silence prevents:
 - a) **Safeguarding of source-level criminal evidence,**
 - b) **Preservation of chain of custody,**
 - c) Disability-adjusted participation for the Claimant,
 - d) Compliance with the **Public Sector Equality Duty** (PSED).

5. The issues raised are of exceptional **public interest**, because they concern:
 - a) **Systemic HMCTS/MoJ failures to safeguard criminal evidence,**
 - b) Alleged mishandling of material associated with an active **IRS:CI investigation**,

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N463 – Continuation Sheet

Section: Section 1– Reasons for Urgency

- c) **Equality Act** failures affecting a disabled litigant,
 - d) **Administrative suppression of evidence linked to serious, organised criminal activity.**
6. An **oral hearing is clinically necessary**. CLAAS confirms that the Claimant's autism prevents her from participating effectively in opaque, paper-only processes, and that administrative silence and ambiguity cause severe distress.
7. **If not urgently listed, the Claimant will suffer further harm, the safeguarding risk will escalate, and the integrity of the evidence may be compromised.**

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N463 – Continuation Sheet

Section: Section 2 – Justification for Urgent Consideration

CONTINUATION SHEET — FORM N463

Section 2 — Justification for Urgent Consideration

Continuation Sheet — Section 2.1

Date and time when it was first appreciated that an urgent application might be necessary

The urgency became clear on **24 November 2025**, at approximately **16:00 (UK time)**, when the Defendants failed to respond to the Pre-Action Protocol letter despite a clear and final deadline and despite the safeguarding and criminal-evidence risks set out in that letter. At this point it became evident that:

- 1) No preservation steps had been taken for the criminal evidence.
- 2) No safeguarding steps had been taken regarding the Claimant as a disabled litigant.
- 3) The administrative silence created an immediate risk of further suppression, loss of evidence, and irreversible harm to the Claimant's position.

The need for urgent judicial intervention became unavoidable at that moment.

Continuation Sheet — Section 2.2

Please provide reasons for any delay in making the application

There is no unreasonable delay.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N463 – Continuation Sheet

Section: Section 2 – Justification for Urgent Consideration

The urgency of this application arises **directly** from the Defendants' failure to comply with the PAP deadline of 24 November 2025 at 16:00 UK time. Until that deadline expired, the Claimant reasonably awaited a substantive response and preserved judicial economy.

Any short delay after the deadline is attributable to:

- 1) The need to finalise and assemble a compliant urgent-application bundle;
- 2) The Claimant's disabilities (Autism + PTSD), which require structured, step-based work and are exacerbated by administrative silence and time pressure;
- 3) The need to ensure that all core safeguarding and evidence-preservation materials are presented to the Court in an orderly manner.

The Claimant acted with all reasonable expedition.

Continuation Sheet — Section 2.3

What efforts have been made to put the Defendant on notice?

The Defendants were repeatedly placed on notice:

1. Pre-Action Protocol letter (19 November 2025)

This was emailed to:

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N463 – Continuation Sheet

Section: Section 2 – Justification for Urgent Consideration

- a) Dr Jo Farrar (MoJ)
- b) Nick Goodwin (HMCTS)
- c) HMCTS senior operational mailbox

It expressly warned that an urgent JR would follow if the PAP deadline was missed.

2. Criminal evidence transmissions (February 2024 – May 2025)

Multiple formal submissions were made to HMCTS, MoJ, the Court of Appeal, and constitutional actors regarding the criminal evidence and the safeguarding failures.

3. Stage 3 Escalation (31 October 2025)

A detailed escalation letter placed HMCTS on notice of wrongdoing, safeguarding failures, and PSED breaches.

4. No response from Defendants

The Defendants failed to acknowledge or respond to any of the above notices, including the final PAP deadline. This silence necessitated the urgent application.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N463 – Continuation Sheet

Section: Section 3 – Proposed Timetable

CONTINUATION SHEET — FORM N463

SECTION 3 – PROPOSED TIMETABLE (CONTINUATION SHEET)

3.1 — How quickly the Claimant requires the application to be considered

The Claimant respectfully requests that the urgent application be considered **within 72 hours (3 days)**.

This reflects:

- a) escalating **safeguarding risks** arising from HMCTS/MoJ's ongoing failure to log, process, or preserve criminal evidence,
- b) risk of further loss or destruction of evidence,
- c) The PAP deadline (24 November 2025 at 16:00) has passed with **no acknowledgment**, increasing the risk of evidence loss or administrative suppression.
- d) The Claimant has **Autism + PTSD** and cannot navigate paper-only or delayed processes safely (per medical evidence, Exhibit B).
- e) The Imerman devices contain **live criminal evidence relevant to IRS:CI**, and administrative inaction poses serious consequences.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N463 – Continuation Sheet

Section: Section 3 – Proposed Timetable

If the Court is able to consider the matter sooner than 72 hours, the Claimant respectfully requests **accelerated consideration within 48 hours.**

3.2 — Nature and timeframe of consideration sought

(1) Interim Relief

Interim relief is sought and should be considered within 48 hours, specifically:

- a) A mandatory **preservation order** all Imerman-related material (devices, emails, correspondence, SJE communications, and any internal handling logs).
- b) A mandatory direction preventing destruction, alteration, or return of any digital or documentary material.
- c) A direction requiring acknowledgment of receipt of this JR application.

(2) Abridgement of Time for Acknowledgment of Service (AOS)

The Claimant requests that the time for AOS be abridged to **7 days** (instead of 21), because:

- a) The Claim raises urgent safeguarding issues.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N463 – Continuation Sheet

Section: Section 3 – Proposed Timetable

- b) The Defendants have already been on notice since at least **19 November 2025** through the PAP.
- c) Relevant factual matters are already in their possession, owing to repeated pre-action transmissions.
- d) **Safeguarding risk** to a disabled litigant is ongoing and severe.

(3) Consideration of the Permission Application (N461)

The Claimant seeks urgent consideration of the N461 application for permission within **7 days**, with the following additional request:

Permission must not be considered on the papers alone due to disability-based participation needs.

(4) Substantive Hearing If permission for judicial review is granted

The Claimant requests that the substantive hearing be listed within **14 days** of the date permission is granted (or rolled-up if appropriate), and that **no paper-only determination is permitted at any stage.**

Requested window:

7 December 2025 – 14 December 2025 (or earliest date convenient to the Court).

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N463 – Continuation Sheet

Section: Section 3 – Proposed Timetable

Other interlocutory directions

The following additional directions are sought within **7 days**:

a) No paper-only consideration

That no part of this urgent application or the underlying permission application may be considered on the papers.

Any paper-only listing must be automatically vacated.

The matter must be listed for an oral hearing with reasonable adjustments, in accordance with the Claimant's disability needs, the Equality Act 2010, and procedural fairness requirements.

b) Mandatory preservation order

A mandatory order requiring HMCTS and MoJ to preserve, protect, and secure all digital and documentary material linked to the **Imerman devices**, including:

- email correspondence,
- SJE communications,
- clerk communications,
- administrative handling notes,
- any chain-of-custody information,

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N463 – Continuation Sheet

Section: Section 3 – Proposed Timetable

- and all derivative materials.

c) Mandatory disclosure

An order requiring the Defendants to disclose:

- all internal logs,
- internal communications,
- chain-of-custody material,
- evidence-handling records,
- and any safeguarding assessments concerning the Claimant's submissions.

d) Retrospective equality duty analysis

A direction requiring the Defendants to:

- complete a retrospective **Public Sector Equality Duty (PSED) analysis** covering all administrative acts and omissions complained of,
- and to file this PSED statement within **14 days**.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N463 – Continuation Sheet

Section: Section 4- Grounds for Urgent Application

CONTINUATION SHEET — FORM N463

SECTION 4– GROUNDS FOR URGENT APPLICATION (CONTINUATION SHEET)

4.1 Factual and legal grounds relied on

1. Immediate safeguarding risk arising from administrative failures

The Defendants (HMCTS and MoJ) have failed to log, acknowledge, preserve, or escalate serious criminal evidence repeatedly submitted between February 2024 and May 2025. They have also failed to safeguard the Imerman devices, which contain source-level criminal material. This creates an ongoing and immediate risk to the integrity of evidence relevant to UK and foreign law-enforcement bodies (IRS:CI). Urgent intervention is required to prevent further loss or tampering.

2. Imminent risk of prejudice to the Claimant as a disabled litigant (Autism + PTSD)

The Claimant cannot safely participate in a paper-only process. The Equality Act 2010 and the Public Sector Equality Duty (s.149) require HMCTS to make reasonable adjustments, ensure participation, and avoid processes that exacerbate disability-related harm.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N463 – Continuation Sheet

Section: Section 4- Grounds for Urgent Application

Administrative silence and paper-based decisions have already caused deterioration and procedural prejudice (see CA refusal of 4 August 2025).

A paper-only listing would violate **Article 6 ECHR and the Equality Act.**

3. Breach of duty to safeguard evidence and maintain chain of custody

The Defendants were on notice that the Imerman devices and associated evidence contained indicators of serious crime, including prostitution proceeds, money laundering structures, Xero bookkeeping, BTC cluster data, and other forensic material. Despite this, they took no steps to preserve chain of custody.

Urgent orders are required to prevent further administrative degradation of evidence.

4. The Defendants have failed to respond to the PAP

The Pre-Action Protocol letter of **19 November 2025** expressly required a response by 16:00 on **24 November 2025**. No acknowledgment or response was received from any Defendant.

This silence increases the urgency: without a prompt judicial response, the case risks becoming unmanageable due to ongoing administrative suppression.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N463 – Continuation Sheet

Section: Section 4- Grounds for Urgent Application

5. Necessity of urgent oral determination due to risk of further administrative suppression

The subject matter includes evidence of criminality, failures of evidence-handling, and systemic administrative non-compliance. These issues cannot safely be adjudicated on the papers.

Only an urgent oral hearing ensures transparency and prevents further mishandling of sensitive material.

6. Urgent interim relief is required to preserve evidence and prevent further administrative failures

Without immediate mandatory orders—preservation, disclosure of evidence-handling logs, chain-of-custody reconstruction, and safeguarding measures—the Court's eventual jurisdiction may be undermined. Delay risks irreparable loss of material evidence and further Equality Act breaches.

7. The matter is suitable for urgent listing within 7 days

The facts raise issues of:

- safeguarding of criminal material,
- disability discrimination,

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: *Nadia Zahmoul*

Defendants: *Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS*

Claim No.: *[leave blank — Court will assign]*

Form: *N463 – Continuation Sheet*

Section: *Section 4- Grounds for Urgent Application*

- administrative-law failures by major public authorities, and
- potential interference with foreign criminal investigations.

These justify urgent judicial control and immediate listing.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N463 – Continuation Sheet

Section: Section 5-Interim Relief/Directions & Draft Order

CONTINUATION SHEET — FORM N463

SECTION 5– INTERIM RELIEF/DIRECTION & DRAFT ORDER (CONTINUATION SHEET)

5.1 Draft Order Attached

A full draft order is attached to this application.

It sets out the precise mandatory and prohibitory relief sought, including:

1. **Immediate preservation and safeguarding orders** over all Imerman-related digital and documentary materials, including (but not limited to) the MacBook Pro, the Ubuntu computer, extracted data, email correspondence, SJE communications, logs, access records, metadata, and any derivative materials.

2. **Mandatory disclosure** of:
 - all internal communications,
 - all logging records,
 - any existing chain-of-custody materials,

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N463 – Continuation Sheet

Section: Section 5-Interim Relief/Directions & Draft Order

- any safeguarding assessments or flags,
- any evidence-handling or case-management notes,
- and reconstruction of the evidence-handling trail insofar as possible.

3. **Equality Act / PSED directions**, including a requirement that the Defendants complete and file a retrospective PSED analysis of all administrative acts complained of within **14 days**.

4. **Hearing format directions**, requiring that:

- no part of this application or the underlying permission decision be conducted on the papers, and
- the matter be listed for an oral hearing with reasonable adjustments, in accordance with the Equality Act 2010 and the Claimant's disability needs.

5. **Expedited listing**, requiring the oral permission hearing (or rolled-up hearing) to be listed within **7 days**.

5.2 Interim Relief and Directions Sought, and Why

The Claimant seeks the interim relief set out below, urgently, on the following grounds:

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N463 – Continuation Sheet

Section: Section 5-Interim Relief/Directions & Draft Order

(A) Preservation of evidence (mandatory order)

The claim concerns serious failures by HMCTS/MoJ to safeguard criminal evidence, including material now connected with an IRS:CI enquiry.

There is an imminent risk that:

- data may be altered, overwritten, destroyed, or lost;
- chain of custody may be further compromised;
- internal communications and logs may be deleted or become inaccessible due to automatic retention policies;
- inadvertent loss may occur through continued administrative inaction.

Immediate preservation orders are essential to prevent irreversible prejudice to both:

- the domestic judicial review, and
- the related foreign criminal investigation.

(B) Mandatory disclosure of logging records and chain of custody

Given the asserted complete absence of logs, audit trails, and safeguarding records, the Court's intervention is required to:

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N463 – Continuation Sheet

Section: Section 5-Interim Relief/Directions & Draft Order

- secure any extant materials immediately;
- compel the reconstruction of the evidence-handling trail;
- prevent further administrative disappearance of key documents.

This relief is needed **before** permission is considered to prevent the JR becoming academic.

(C) Oral hearing and prohibition on any paper determination

Because the Claimant is a disabled litigant with Autism and PTSD (clinical evidence provided):

- paper-only consideration is unsafe and would replicate the harm caused at the Court of Appeal;
- the Claimant cannot meaningfully participate in a paper process;
- administrative silence and lack of clarity have already caused severe distress.

Accordingly:

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N463 – Continuation Sheet

Section: Section 5-Interim Relief/Directions & Draft Order

- **no part of this application or the permission decision should be considered on the papers, and**
- the matter must be listed for an oral hearing with reasonable adjustments.

This direction is necessary to secure:

- procedural fairness,
- compliance with the Equality Act 2010, and
- avoidance of disability-related disadvantage.

(D) Retrospective PSED analysis

HMCTS has expressly confirmed in its letter of **14 November 2025** that it did not consider the Claimant's disability needs or the PSED when:

- failing to log evidence,
- withdrawing Part 3A measures,
- maintaining administrative silence,
- failing to safeguard the Imerman devices.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS

Claim No.: [leave blank — Court will assign]

Form: N463 – Continuation Sheet

Section: Section 5-Interim Relief/Directions & Draft Order

A retrospective PSED analysis is therefore necessary to:

- identify the full extent of Equality Act breaches,
- inform the Court's supervision,
- and ensure no further discriminatory treatment occurs during the proceedings.

(E) Expedited timetable (7 days)

Urgency is justified because:

- the PAP deadline passed without acknowledgment;
- the Defendants' silence increases safeguarding risk daily;
- criminal-evidence materials are at risk of loss;
- delays would materially prejudice the Claimant and impede foreign law-enforcement processes.

Accordingly, the Claimant seeks:

- urgent consideration of this N463 within **7 days**, and
- (if permission is granted or rolled-up) a substantive hearing within **14 days** thereafter.

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION – ADMINISTRATIVE COURT

NADIA ZAHMOUL — CLAIMANT

v.

SECRETARY OF STATE FOR JUSTICE & OTHERS — DEFENDANTS

URGENT STATEMENT OF GROUNDS

URGENT STATEMENT OF GROUNDS

(For Form N463 — Urgent Consideration Request)

- 1.** This Judicial Review requires urgent consideration because the Respondents' ongoing administrative failures continue to expose the Claimant — a disabled litigant with Autism and PTSD — to serious safeguarding risk, deterioration in health, and ongoing procedural unfairness.
- 2.** The core subject matter of the claim concerns **criminal evidence mishandling, loss of chain of custody, administrative suppression, and failure to safeguard the Imerman devices** containing source-level criminal evidence. These failures remain unresolved today. No safeguarding steps have been taken despite repeated notice.
- 3.** The Claimant's Autism Assessment Report (CLAAS, 1 July 2025) confirms a medical requirement for **clear, responsive, real-time communication** and documents that administrative silence, ambiguity, or non-engagement causes acute distress and destabilisation. The current situation — characterised by complete administrative non-response — continues to worsen her condition.

4. The Court of Appeal refusal of 4 August 2025 demonstrated the harm caused by **private, paper-only decision-making** in this Claimant's case: disability evidence was not reviewed; criminal evidence was not reviewed; and core procedural fairness issues were not considered. The same situation **must not be repeated** in the Administrative Court.

5. The Claimant requires an **urgent oral hearing** because a paper determination would replicate exactly the administrative risks and discriminatory outcomes that triggered this dispute. Her disability requires a hearing where she can observe, clarify, and respond in real time, supported by transcription. This is the minimum accommodation required under the Equality Act 2010.

6. The Respondents' ongoing non-acknowledgment of serious criminal evidence — including material under active review by U.S. IRS:CI — raises issues of **public safety, evidence preservation, and international law-enforcement integrity**. Each day of continued administrative silence increases the risk of further loss, tampering, or destruction of criminal material.

7. Interim relief is required because the Respondents have not confirmed preservation of:

- internal communications,
- chain-of-custody records,
- logs relating to the Imerman devices,
- safeguarding assessments, and
- evidence-handling decisions.

With no preservation assurance in place, delay materially increases the risk of irreversible prejudice.

8. The Claimant is medically deteriorating and has been advised by clinicians in both the UK and U.S. that prolonged unresolved litigation without clear structure or communication places her at significant risk of breakdown and hospitalisation. Urgency is therefore required **both for procedural fairness and for safeguarding her health.**

9. For these reasons, the Claimant respectfully requests:

- urgent listing of the permission hearing within 7 days,
- the hearing to be **oral, public, and recorded/transcribed**, and
- consideration of **rolled-up hearing** format to prevent further prejudice.

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION – ADMINISTRATIVE COURT

NADIA ZAHMOUL — CLAIMANT

v.

SECRETARY OF STATE FOR JUSTICE & OTHERS — DEFENDANTS

EVIDENCE

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION – ADMINISTRATIVE COURT

NADIA ZAHMOUL — CLAIMANT

v.

SECRETARY OF STATE FOR JUSTICE & OTHERS — DEFENDANTS

WITNESS STATEMENT OF NADIA ZAHMOUL (WS1)

Witness Statement of Nadia Zahmoul (WS1)

IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION / ADMINISTRATIVE COURT

Claimant: Nadia Zahmoul

Defendants: Secretary of State for Justice; Permanent Secretary, MoJ; Chief Executive, HMCTS

DETAILED WITNESS STATEMENT

1. I am the Claimant. I make this Witness Statement in support of my claim for Judicial Review concerning the failure of HMCTS and the Ministry of Justice to log, process, safeguard, or transmit serious criminal evidence and the failure to safeguard the Imerman devices containing source-level criminal material.
2. This Statement of Facts expands upon the shorter chronology used in the N461 and provides the full factual narrative necessary for the Court's assessment. All facts stated herein are true to the best of my knowledge and belief.
3. Between February 2024 and May 2025, I repeatedly submitted serious criminal evidence to HMCTS, MoJ, the Court of Appeal, senior constitutional actors, and court-appointed experts. This evidence concerns money laundering of prostitution proceeds, cryptocurrency tracing, Xero bookkeeping records, and other organised-crime indicators linked to the Respondent. These submissions were not logged, acknowledged, escalated, or safeguarded.
4. The criminal evidence includes information provided by the Respondent via Signal messaging ("Pinocchio File") from the Ubuntu and MacBook Pro devices, comprising prostitution ledgers, BTC wallet clusters, Xero bookkeeping, detailed step-by-step forensic evidence of the money laundering mechanism. The evidence

also included the Respondent's own financial-control documents created for the benefit of an organised prostitution network.

5. On 8 February 2024, I transmitted criminal evidence to the Single Joint Expert (SJE) appointed by the High Court. The evidence included the Criminal Referrals (Parts 1–3) and the source documentation supporting each referral.
6. On 11 April 2024, I transmitted Criminal Referrals (Parts 1–3) to the Secretary of State for Justice, the Ministry of Justice, HMCTS, and the senior judicial office. None of these transmissions were logged or acknowledged.
7. On 12 May 2025, I transmitted Section C (Criminal Activities: Money Laundering of Prostitution Proceeds) to the Court of Appeal, the House of Lords, Members of Parliament, the Cabinet, MoJ, and HMCTS, following a further deterioration in safeguarding risk and administrative silence.
8. HMCTS and MoJ remained silent throughout all transmissions, failing to acknowledge, log, or escalate any material. No safeguarding steps were taken and no chain of custody record exists.
9. The Imberman devices (MacBook Pro and Ubuntu computer) were placed in escrow in 2021. From the outset, these devices contained criminal evidence, not merely confidential financial information. I repeatedly notified HMCTS, the judge's clerk, the SJE, my solicitors, and the Respondent's solicitors that the devices contained criminal evidence requiring forensic review.
10. On 25 February 2022, I raised a safeguarding alert after the Respondent's solicitors attempted to retrieve the Ubuntu device from escrow without court supervision. This was a red flag for potential evidence tampering. HMCTS were informed, but no action was taken.
11. The devices remained unreviewed for more than four years. No forensic expert was appointed, no chain of custody was preserved, and no administrative safeguarding steps occurred.

12. During the trial (19–28 February 2024), Part 3A participation measures were granted due to my Autism, PTSD, and communication vulnerabilities. These measures were in force during the trial.
13. After the trial, without any hearing, order, reasons, or judicial determination, the measures “vanished.” HMCTS later claimed the revocation was “judicial,” but no such judicial act occurred. There is no record, no order, no reasons, and no process. This is an administrative malfunction.
14. On 31 October 2025, I submitted a Stage 3 escalation complaint to HMCTS regarding breaches of FPR Part 3A, the Equality Act 2010, and failures to safeguard criminal evidence.
15. On 14 November 2025, HMCTS issued a letter stating that my allegations regarding unlawful withdrawal of participation measures, discrimination, and PSED breaches were “judicial” matters that could not be investigated administratively.
16. This classification is false. HMCTS’s own letter confirms they never logged or analysed the underlying evidence and did not conduct any safeguarding assessment. Their mischaracterisation is itself an administrative failure and strengthens this JR.
17. Throughout 2024–2025, I made repeated requests for safeguarding intervention, acknowledgment, or basic administrative processing. None were logged.
18. I suffer from Autism Spectrum Condition and PTSD. My Autism Assessment Report (CLAAS, 1 July 2025) confirms that I require structured, transparent, direct communication and that administrative silence or ambiguity causes severe distress and cognitive overload.
19. HMCTS/MoJ were repeatedly informed of my vulnerabilities and the need for accommodations but failed to provide reasonable participation measures.
20. The administrative silence and failure to safeguard criminal evidence caused a significant deterioration in my mental health and severe safeguarding risk.

21. In 2024 and 2025, I informed HMCTS/MoJ that the criminal evidence had been accepted for review by U.S. IRS:CI. I also provided case confirmation communications. HMCTS did not acknowledge or escalate.
22. IRS:CI confirmed to me that proper evidence preservation is essential and that mishandling of material, including failure to maintain chain of custody, could compromise an active U.S. investigation.
23. Despite this, HMCTS/MoJ still undertook no safeguarding or preservation steps.
24. The administrative failures—non-logging, non-escalation, non-acknowledgment, and disappearance of devices—are operational errors squarely within JR jurisdiction.
25. None of these matters concern the merits of any judicial determination. They concern administrative processing failures.
26. These failures deprived me, as a disabled litigant, of effective participation, safeguarding protection, and access to justice.
27. The Court of Appeal refusal of 4 August 2025 further demonstrates the risks of paper-only determinations, especially in cases involving administrative suppression of evidence. The refusal did not address disability, criminal evidence, or Part 3A issues.
28. That decision was final and non-renewable, demonstrating the dangers of opaque processes for a disabled litigant with autism.
29. Based on the pattern of administrative suppression and failure to engage, a private paper determination in the JR would place me at considerable risk.
30. I have therefore requested an urgent public oral hearing.
31. On 19 November 2025, I served a Pre-Action Protocol letter demanding preservation of all internal communications, chain-of-custody materials, and evidence-handling logs.

32. The PAP invoked “sunlight mechanisms” to prevent further suppression, including notification to the Administrative Court Office and a safeguarding brief.
33. The PAP also notified HMCTS/MoJ that foreign law enforcement agencies were reviewing the evidence.
34. To date, no acknowledgment or confirmation of preservation has been received.
35. I have suffered acute distress and significant deterioration of my physical and mental health due to administrative silence and lack of safeguarding.
36. This JR is the only available remedy to address administrative failures that have compromised my safety, rights, and access to justice.
37. The issues raised in this Judicial Review are of **significant public interest**, as they relate to the systemic integrity of the justice administration and the proper administrative functioning, accountability, and legal duties of major government and court bodies regarding matters of serious crime and vulnerable individuals.
38. The administrative failures of UK public bodies to safeguard evidence linked to an international criminal inquiry raises the public interest significantly.
39. I believe that the facts set out in this Statement are true. I understand that this Witness Statement will be used in the Judicial Review proceedings.

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true.

I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Nadia Zahmoul

Signed: _____

Name: Nadia Zahmoul

Dated: 25 November 2025

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION – ADMINISTRATIVE COURT

NADIA ZAHMOUL — CLAIMANT

v.

SECRETARY OF STATE FOR JUSTICE & OTHERS — DEFENDANTS

EXHIBIT A – KEY ADMINISTRATIVE FAILURES

8TH February 2024

Nadia Zahmoul

Subject: Confidential - Ongoing criminal investigation IRS: CI - Cyber Investigation Unit - New York Field Office - Part 1 of 4

Date: Thursday, February 8, 2024 at 9:24:48 AM Mountain Standard Time

From: Nadia <nadia@rosekross.com>

To: Marlon Pinto <marlon.pinto@another-day.com>

Priority: High

Attachments: image001.png, availability for call to discuss new documents.eml, 2. REFERRAL PART 1 (M. PINTO FINAL).pdf, 3. REFERRAL PART 2 (M. PINTO FINAL).pdf

Zahmoul v. Zahmoul - BV20D01752

Dear Marlon,

I am sorry to hear you had Covid and I hope you are making a full recovery.

Please see below the email exchange with [REDACTED] **Special Agent, U.S. Department of the Treasury, IRS:CI / Cyber Investigations Unit, New York Field Office.** I have been informed that Special Agent [REDACTED] has an ongoing criminal investigation into Mr. Zahmoul's money laundering of proceeds from prostitution services using cryptocurrency.

Please feel free to contact [REDACTED] directly to confirm the facts I am referencing.

Taking into consideration your background as a criminal investigator, and in accordance with my duty to act with honesty and integrity vis-à-vis you, the SJE, I am hereby confidentially notifying you that there is an ongoing investigation by the **United States Internal Revenue Service - Criminal Investigations Division - Cyber Investigations Unit, New York Field Office** into the source of the criminal property into BTC cluster 1AWKgdMEwDjHxL3WcaoijvmnH5LXkTA3zw (known as the "Molina Cluster") which, upon information and belief, was managed by Mr. Karim Noureddine Zahmoul ("Mr. Zahmoul") in furtherance of the prostitution activities led and coordinated by Ms. Olivia Molina Avellaneda ("Ms. Molina") in Dubai and elsewhere under Blue Ocean Services FZE ("Blue Ocean.")

The evidence supports the fact that Mr. Zahmoul, along with others, was not only instrumental in setting up the front company through which Ms. Molina operated but also in placing, layering, and integrating the proceeds of her illicit activities and laundering those proceeds across international borders. I became aware of Mr. Zahmoul's participation in laundering criminal proceeds for Ms. Molina during the pandemic when he shared with me and with our daughters that he was laundering money for Ms. Molina through his American Express card because of their origin. However, at the time, I did not understand the magnitude of Mr. Zahmoul's involvement in money laundering of prostitution proceeds using cryptocurrency. Furthermore, I did not understand the implications his illicit activities could have for the financial remedy settlement which will be decided at the Final Hearing in High Court, Family Division set to begin on 19 February 2024.

My U.S. attorney has advised me about the potential risk for criminal asset forfeiture I am exposed to in relation to the tainted criminal property laundered by Mr. Zahmoul through the Molina Cluster, sent into the Coinbase account which formed part of our marital assets and ultimately comingled with our marital assets. These laundered funds were then unilaterally used by Mr. Zahmoul to pay down the joint mortgage we held at Bank of Jackson Hole against the properties at 3093 and 3100 Arrowhead Road (known as the "Wyoming properties.")

Given Mr. Zahmoul's dissipation of the marital balance sheet, the Wyoming properties represent a significant part of our remaining assets. More importantly, the house at 3093 Arrowhead Road is considered "home" by our daughters after our forced displacement from the UK. I have further been advised - and it has become evident to me - that a potential criminal asset forfeiture action would directly reduce my financial award and compromise my daughters' future and my own.

This email and the attachments are consistent with the (i) Family Court's Practice Direction 25-D "***Financial Remedy Proceedings & the Use of Subject Joint Experts***" which sets out the fact that the overriding objective of the selection and appointment of a Single Joint Expert is to enable the court to deal with cases justly, and (ii) my acknowledgement and understanding that Another Day investigators, acting in the interests of justice, must investigate all reasonable lines of inquiry, as referenced in the ***Master Services Agreement*** signed and entered in to by all parties.

With kind wishes,
Nadia

[REDACTED]:
Hi Nadia,

Hope you are well. We received the new documents you uploaded to BOX. We will review them and would like to set up a call with you the week of 12/18 to discuss. What day would work best for you that week? We are available any day except 12/22.

Thanks,
[REDACTED]

[REDACTED]
Special Agent
U.S. Department of the Treasury
IRS:CI | Cyber Investigations Unit
New York Field Office
[REDACTED]

Nadia Zahmouli

Subject: Confidential Part 2 of 4
Date: Thursday, February 8, 2024 at 9:25:46 AM Mountain Standard Time
From: Nadia <nadia@rosekross.com>
To: Marlon Pinto <marlon.pinto@another-day.com>
Attachments: 4. NZ_Cluster_transfers_of_1AWKgdMEwDjHxL3WcaojvmnH5LXkTA3zw_BTC_10jan2024.xlsx, 5. PINOCCHIO 1.pdf

Please find attached part 2.

Veritas Numquam Perit

UK: +44 79 1332 8615

US: +1 424 426 9226

Nadia Zahmoul

Subject: Confidential Part 3 of 4
Date: Thursday, February 8, 2024 at 9:27:14 AM Mountain Standard Time
From: Nadia <nadia@rosekross.com>
To: Marlon Pinto <marlon.pinto@another-day.com>
Attachments: 6. PINOCCHIO 2.pdf, 7. SUMMARY FOR M. PINTO.pdf, 8. Timeline 20 July 2021_NZ.docx, 9. SUPPORTING_DOCUMENTS.zip

Please find attached part 3

Veritas Numquam Perit

UK: +44 79 1332 8615

US: +1 424 426 9226

Nadia Zahmouli

Subject: Confidential Part 4 of 4

Date: Thursday, February 8, 2024 at 9:30:04 AM Mountain Standard Time

From: Nadia <nadia@rosekross.com>

To: Marlon Pinto <marlon.pinto@another-day.com>

Priority: High

Attachments: 12. Excerpts from recording of video call with Olivia Molina on 9th January 2022.pdf, 10. OMNZ_RECORDING_09JAN2022.m4a, 11. WhatsApp Msg Part 1.pdf

Please find part 4.

Veritas Numquam Perit

UK: +44 79 1332 8615

US: +1 424 426 9226

Nadia Zahmoul

Subject: Criminal investigation - IRS CI Cyber Investigations Unit
Date: Thursday, February 8, 2024 at 10:13:42 AM Mountain Standard Time
From: Nadia <nadia@rosekross.com>
To: Marlon Pinto <marlon.pinto@another-day.com>
Priority: High
Attachments: image001.png

Dear Marlon,

I have been advised that there is an ongoing criminal investigation by IRS CI Cyber Investigations Unit, New York Field Office into M. Zahmoul's money laundering of prostitution proceeds using cryptocurrency.

This has a direct impact on the financial settlement and a risk of potential asset forfeiture.

I sent you all the relevant documents, which include the cryptocurrency evidence.

It is my duty to inform you.

Please feel free to contact Special Agent [REDACTED] at the IRS CI, he is in charge of the investigation.

[REDACTED]
Special Agent
U.S. Department of the Treasury
IRS:CI | Cyber Investigations Unit
New York Field Office
[REDACTED]

With kind wishes,
Nadia

Veritas Numquam Perit
UK: +44 79 1332 8615
US: +1 424 426 9226

Nadia Zahmoul

Subject: RE: Criminal investigation - IRS CI Cyber Investigations Unit
Date: Thursday, February 8, 2024 at 10:16:54 AM Mountain Standard Time
From: Marlon Pinto <marlon.pinto@another-day.com>
To: Nadia <nadia@rosekross.com>, Zoë Bloom <Zoe.Bloom@bloombudd.co.uk>
CC: Simon Davison <simon.davison@another-day.com>, Tim Townsend <tim.townsend@another-day.com>
Attachments: image001.png

Thank you Nadia, and for the other emails.

Cc'ing your legal team who I imagine will speak with his legal team. For the purposes of this, I have not cc'd his legal team as this may jeopardise any ongoing government investigation.

From: Nadia <nadia@rosekross.com>
Sent: Thursday, February 8, 2024 5:14 PM
To: Marlon Pinto <marlon.pinto@another-day.com>
Subject: Criminal investigation - IRS CI Cyber Investigations Unit
Importance: High

[EXTERNAL]

Dear Marlon,

I have been advised that there is an ongoing criminal investigation by IRS CI Cyber Investigations Unit, New York Field Office into M. Zahmoul's money laundering of prostitution proceeds using cryptocurrency.

This has a direct impact on the financial settlement and a risk of potential asset forfeiture.

I sent you all the relevant documents, which include the cryptocurrency evidence.

It is my duty to inform you.

Please feel free to contact Special Agent [REDACTED] at the IRS CI, he is in charge of the investigation.

[REDACTED]
Special Agent
U.S. Department of the Treasury
IRS:CI | Cyber Investigations Unit
New York Field Office
[REDACTED]

With kind wishes,

Nadia Zahmoul

Subject: Re: URGENT: Zahmoul and Zahmoul
Date: Thursday, February 8, 2024 at 11:15:21 AM Mountain Standard Time
From: Nadia <nadia@rosekross.com>
To: Faye Simpson <faye.simpson@afpbloom.com>, Zoë Bloom <Zoe.Bloom@afpbloom.com>
Attachments: image001.png, image002.png, image003.png, image004.png, image005.png, image006.png, image007.png, image008.png

Dear Faye,

I sent Marlon the material and email correspondence shared with Special Agent [REDACTED] in charge of the IRS CI ongoing investigation into Karim's money laundering of prostitution proceeds using cryptocurrency.

As set out in the Master Services Agreement signed by all parties including me, Marlon has a duty to act as a Minister of Justice during the course of his investigation, and I have a client obligation to report criminal activity to Another Day.

In order to avoid jeopardizing the ongoing investigation I will call IRS CI as soon as I can and will get back to you.

With kind wishes,
Nadia

On 08/02/2024, 9:46 AM, "Faye Simpson" <faye.simpson@afpbloom.com> wrote:

Dear Nadia,

We have just received the below email from Marlon.

Please can you send us copies of all emails and documentation you have sent to him as a matter of urgency.

Kind regards,

Faye

Faye Simpson
faye.simpson@afpbloom.com
T: 020 7409 1222
106-108 Wigmore Street, London, W1U 3LR
www.afpbloom.com

11TH APRIL 2024

Subject: Criminal activities, Ukraine-invasion sanctions, and threat to our lives (Part 1/3)
Date: Thursday, April 11, 2024 at 8:42:40 PM Mountain Daylight Time
From: Nadia <nadia@rosekross.com>
To: alex.chalk.mp@parliament.uk <alex.chalk.mp@parliament.uk>
CC: paul.mclain@parliament.uk <paul.mclain@parliament.uk>, freemanl@parliament.uk <freemanl@parliament.uk>
Priority: High
Attachments: image001.png, Confidential MacDonald J. 9April2024.pdf, Exhibits part 2.pdf, D-11_OXUS_FALSE REPRESENTATIONS.pdf, 1. Basis for Criminal Referral.pdf

Dear Alex,

Thank you again for your email. I have put together background information regarding the three principal matters I would like to discuss at our meeting. I hope this is useful.

- (i) **Very high risks to the children's safety and mine**: intimidation, bullying, and direct threats by people working for **Kenes Rakishev**.
- (ii) Mr. Zahmoul's criminal activities: **Laundering of criminal property derived from prostitution enterprise** (UK nexus).
- (iii) Mr. Zahmoul's criminal activities: **Laundering of kleptocracy funds and circumventing of OFAC and EU sanctions**. Employed by **Kenes Rakishev**, Kazakh oligarch and frontman for **Putin and Kadyrov**. Laundering of kleptocracy funds of unexplained origin, circumvention of OFAC and EU sanctions, investments of kleptocracy funds in cryptocurrency, vehicles for laundering include Emviryta Ltd and Forte Securities Ltd, access to capital markets via Nasdaq-registered SPAC owned by **Kenes Rakishev**, laundering of kleptocracy funds via investments in renewable energy, launch of \$200m “Oxus Visionary Fund”, cryptocurrency trading via Bitwyre and other entities.

Very high risk to the children's safety and mine.

The email and the attached document provide the background of the incidents of intimidation and threats we have received as a result of Mr. Zahmoul's involvement with **Kenes Rakishev** and his role in laundering money for the Kazakh oligarch and facilitating access to the capital markets. I intend to report the third incident when I return to Cheltenham next week as the Gloucestershire police already has records of the first incident in June 2023 involving the Kazakhs. I will meet with EJY at Cheltenham Ladies' College when I drop off my daughter Lila Mae and will put in place a plan to protect her from any further threats. As per the email below, I informed M. MacDonald J. (the judge assigned to our divorce proceedings in High Court) of the threats to our safety and of Mr. Zahmoul's involvement with **Kenes Rakishev**, a front man for Kazakh and Russian oligarchs well known to the UK Parliament. Mr. Zahmoul works for criminals and is laundering money to help them circumvent the sanctions imposed as a result of the Ukraine invasion on 24 February 2022. The incident involving Lila Mae and me occurred shortly after I submitted the attached application to M. MacDonald J. titled “D-11 Oxus False Representations” which unfortunately I had copied to Mr. Zahmoul's solicitors. The document explains that Mr. Zahmoul was granted 50,000 Founders Shares of Oxus and falsely

represented to the court in his asset schedule and under oath during the trial that the shares were worthless. After I submitted the document to the judge, Lila Mae and I were followed while walking from Kensington High Street to the flat we are staying at in Queensgate Gardens.

I intend to apply for a protection order to prohibit Mr. Zahmoul from contacting and approaching me and the children as I am extremely worried for our safety, he works for murderers, and I do not trust him at all.

I am confident M. MacDonald J. will do what is best for the children's safety and mine.

Criminal referral: Laundering of criminal property derived from prostitution enterprise Part 7 of Proceeds of Crime Act 2002 ('POCA') Money Laundering Offenses the Fraud Act of 2006.

The attached referral provides documentary evidence of Mr. Zahmoul's criminal activities in the UK.

1. Background to overt acts engaged in and furthered by Mr. Zahmoul
2. Management and furtherance of prostitution enterprise.
3. Laundering of prostitution proceeds via cash pick-ups.
4. Laundering of criminal proceeds via UK bank accounts
5. Laundering of criminal proceeds via Bitcoin wallets.
6. Basis for criminal allegations pursuant to the sexual offences act of 2003.
7. Basis for criminal allegations pursuant to section 2 of the modern slavery act of 2015.
8. Basis for allegations related to criminal conduct and criminal property
9. Basis for money laundering allegations.
10. Criminalization of human trafficking and prostitution in Dubai.

Lastly, I would like to share confidential information regarding Mr. Zahmoul's role for **Kenes Rakishev**. This includes information on the mechanics of how Mr. Zahmoul uses **Emviryia Ltd.** his financial firm registered with Company House and regulated by the FCA to launder funds for the oligarchs and provide access to capital markets, investment opportunities and cryptocurrency trades via his institutional relationship with Forte Securities. Mr. Zahmoul has an equity ownership in and is on the Board of Directors of Bitwyre, a cryptocurrency derivatives platform which he also uses to trade on behalf of **Rakishev**.

With my kind wishes,
Nadia

Veritas Numquam Perit

UK: +44 79 1332 8615

US: +1 424 426 9226

On 09/04/2024, 11:28 AM, "Nadia" <nadia@rosekross.com> wrote:

This email is extremely confidential as the children and I are at risk. I have legitimate reasons to be very concerned for our safety and for our lives.

Dear Karen,

I hope you are well.

I am the applicant in case **BV20D01752**.

I would be very grateful if you could please pass this on to His Lordship.

With my kind wishes,
Nadia

Your Lordship,

I apologise for writing to Your Lordship on your first day back and while the judgement is still reserved, however I have grave concerns for the safety and security of the children and mine, and legitimate reasons to fear for our lives. These events are material and I feel strongly they should be brought to your attention because they are related to these proceedings and also represent a risk to our safety post-divorce.

In 2023, I was involved in two separate incidents which made me very concerned for our safety. I took steps and reported them to the police. The third incident happened on Sunday 24th March while I was out in Kensington, London with our 16-year-old daughter Lila Mae.

I believe that these tangible threats to our security are directly related to the respondent's position as a Director with Oxus Acquisition Corp. ("Oxus") and his affiliation with Kenes Rakishev ("Rakishev") who ultimately controls Oxus. I believe the respondent is involved in money laundering activities for Kazakh kleptocrats and these activities are intended to circumvent the US and EU sanctions following the invasion of Ukraine. I believe the respondent facilitates access to the capital markets, international banking networks, and global investment opportunities, including in cryptocurrency. In addition, I believe the people who hired the respondent are tasked with meddling and interfering with the 2024 U.S. presidential elections.

The attached statement presents my preliminary findings based on new information and better insight. Since the third incident involving Lila Mae, I have been working without rest to analyse the information available to me and understand how everything is connected. I read books on corruption, money laundering, sanctions, and global money flows. I read about Sergei Magnitsky, and it became very clear to me that I have to be very careful and stay away. I

would like the children and I to be safe and as far as possible from this world.

I informed Special Agent [REDACTED] IRS Criminal Investigations, as he has an ongoing criminal investigation into the respondent's money laundering activities since September 2023. His reply are below.

I have been advised to refer the matter to the U.S DOJ's "***KleptoCapture Task Force***" and I was given two contact names.

I have a direct introduction to Hunter Biden through a very close friend; however, I have been advised to hold off until I speak with Special Agent [REDACTED]

In the U.K. I am preparing to file a referral with the FCA.

I am very worried for the children's safety and mine. The people the respondent is involved with are trying to intimidate me and they are very dangerous. I will do everything I can to protect the children from these criminals.

I do not have legal representation due to lack of funding and as I explain in the attached statement, the respondent has not made the MPS payments since the trial. The children and I have no home (we cannot stay in Wyoming because I cannot pay the maintenance charges for the property) and we have no financial resources for our living expenses and basic needs. The only account I have visibility into is our joint account at Bank of Jackson Hole which currently has a balance of \$82,267.

I entrust our safety into your hands.

Sincerely,

Nadia Zahmoul

Veritas Numquam Perit

UK: +44 79 1332 8615

US: +1 424 426 9226

On 08/04/2024, 7:40 PM, "[REDACTED]" wrote:

Hi Nadia,

Thanks for uploading the new information. Once we have had a chance to review it I will reach back out to set up a call to discuss any questions we have.

Thanks,

[REDACTED]
[REDACTED]
Special Agent

U.S. Department of the Treasury
IRS:CI | Cyber Investigations Unit
New York Field Office

From: Nadia <nadia@rosekross.com>
Sent: Monday, April 08, 2024 4:49 AM
To: [REDACTED]
Subject: [EXT]Important new information

Dear [REDACTED]

I hope you are well and had great Easter holiday.

The trial finished on 28 February 2024 and the judgement is reserved.

I have material new information which came to light during the course of the ten-day trial and immediately following the trial.

I have uploaded a substantial amount of new material to the shared Box drive and will be adding more documents over the next few days.

As you know, Mr. Zahmoul is on the Board of Directors of Oxus Acquisition Corp. The SPAC completed its business combination with Borealis on 7th February 2024 and the new company was launched on Nasdaq under the ticker symbol BRLS. The majority owner and chairman of the board is Kenes Rakishev.

The documents I uploaded include proprietary information, open-source information, a timeline, and a power-point presentation.

Mr. Zahmoul is involved in money laundering for Kenes Rakishev, not only through the SPAC but also through other special purpose vehicles. Mr. Zahmoul is potentially using his London-based financial firm, Envirya Ltd, to facilitate investments on behalf of Rakishev, including cryptocurrency investments through his institutional relationship with Forte Securities.

Rakishev is acting as a proxy for Ramzan Kadyrov (Chechen leader, sanctioned) and for prominent Kazakh oligarchs.

Rakishev is a close friend of Hunter Biden and is cited in the House of Representatives's memorandum on the "*Biden Influence Peddling Schemes*" for making a payment of \$142,300 to Hunter Biden for the purchase of a car.

The information uploaded relates to the following matters:

- OFAC Ukraine sanctions
- Access to capital markets for sanctioned entities.
- Money laundering on behalf of kleptocrats.
- Interference with 2024 US elections.

I have been advised to send the information to DOJ's recently launched "**KleptoCapture Task Force**" and I was given two contact names.

I also have a direct introduction to Hunter Biden through a very close friend. However, [REDACTED] has strongly recommended that I hold off and don't do anything until I hear from you.

I will continue to upload the new material over the next few days. [REDACTED] are available to speak at your convenience to discuss the new material.

With my kind wishes,
Nadia

BV20D01752

Veritas Numquam Perit
UK: +44 79 1332 8615
US: +1 424 426 9226

Nadia Zahmouli

Subject: Criminal activities, Ukraine-invasion sanctions, and threat to our lives (Part 2/3)
Date: Thursday, April 11, 2024 at 8:46:46 PM Mountain Daylight Time
From: Nadia <nadia@rosekross.com>
To: CHALK, Alex <alex.chalk.mp@parliament.uk>
CC: MCLAIN, Paul <paul.mclain@parliament.uk>, FREEMAN, Lorraine <freemanl@parliament.uk>
Attachments: CONFIDENTIAL REFERRAL PART 1 OF 3_DS.pdf

Dear Alex,

Enclosed part the 2nd part of the criminal referral.

With kind wishes,
Nadia

Veritas Numquam Perit

UK: +44 79 1332 8615

US: +1 424 426 9226

Nadia Zahmouli

Subject: Criminal activities, Ukraine-invasion sanctions, and threat to our lives (Part 3/3)
Date: Thursday, April 11, 2024 at 8:51:35 PM Mountain Daylight Time
From: Nadia <nadia@rosekross.com>
To: CHALK, Alex <alex.chalk.mp@parliament.uk>
CC: MCLAIN, Paul <paul.mclain@parliament.uk>, FREEMAN, Lorraine <freemanl@parliament.uk>
Attachments: CONFIDENTIAL REFERRAL PART 2 OF 3.pdf, CONFIDENTIAL REFERRAL PART 3 OF 3.pdf

Dear Alex,

Please find enclosed the third part of the criminal referral.

With my kind wishes,
Nadia

Veritas Numquam Perit

UK: +44 79 1332 8615

US: +1 424 426 9226

12TH APRIL 2024

Subject: BV20D01752 - Zahmoul
Date: Friday, April 12, 2024 at 8:23:19 AM Mountain Daylight Time
From: Nadia <nadia@rosekross.com>
To: karen.selby-king@justice.gov.uk <karen.selby-king@justice.gov.uk>
CC: Brent Molyneux KC <BMolyneux@29br.co.uk>, James Shortall <JShortall@29br.co.uk>
Priority: High
Attachments: image001.png, Confidential MacDonald J. 9April2024.pdf, Exhibits part 2.pdf, D-11_OXUS_FALSE_REPRESENTATIONS.pdf, 1. Basis for Criminal Referral.pdf

Dear Karen,

I would be grateful if you could please pass this on to Mr. Justice MacDonald.

Sincerely,
Nadia

Dear Judge,

Please see below my email to Alex Chalk with regards to criminal activities and the threat to our lives.

Further to my email of 9th April 2024 in which I mentioned that Lila Mae and I had been followed, and that Mr. Zahmoul's relationships with certain individuals presents a direct and immediate danger to our lives, I have shared all the relevant criminal information regarding Mr. Zahmoul's criminal activities in the U.K. with **Alex Chalk**, including money laundering of prostitution proceeds using UK banks and cryptocurrency. I also have a legal opinion that the criminal matters Mr. Zahmoul is involved in meet the high bar of criminal threshold in the UK. The attached document provides the basis for criminal activities in the UK.

As you know, Lila Mae and I were threatened, I am being intimidated and bullied, I fear for our lives, and Mr. Zahmoul has been contacting me despite very clear instructions that I feel threatened by him and do not want to have any contact with him ever again. I am extremely worried about the children's safety and mine and this is my utmost priority.

I have a meeting with **Alex Chalk** to discuss the criminal matters, the confidential information regarding Mr. Zahmoul's money laundering in the UK, the role of his company Emviryा in money laundering and access to capital markets, the role of Forte Securities in providing wholesale trading desks and institutional trading services, the fears to our safety, and the immediate threats we are exposed to. I have documentary evidence of all allegations.

Non-Molestation Order

I would like to apply for a Non-Molestation Order as soon as possible and need legal assistance. Unfortunately, I have no financial resources to protect the children and myself from the intimidation, bullying, and threats to our lives we are facing both from Mr. Zahmoul as well as from foreign forces. I need access to our bank accounts to instruct a solicitor urgently. I will not communicate with the respondent and I am extremely threatened by him. Lila Mae is aware of what is happening and is traumatised. I have arranged with Cheltenham Ladies' College pastoral care to speak with Lila Mae about her fears and have spoken with the Principal of Cheltenham Ladies' College to update her on the current situation and the threats we are facing. As mentioned to Alex Chalk in my email, I will put in place a safety plan for Lila Mae when she returns to school after the Easter holiday. Lila Mae and Jade Mia are both UK citizens.

Draft Judgement

With regards to the proceedings, I am unfortunately unable to have a fair and equitable representation due to the following:

1. **Draft judgement:** I need legal counsel to represent me for the judgement and assist me in preparing the **corrections and material omissions**. Mr. Brent Molyneux KC does not take direct instructions and is not able to take my instructions with regards to the draft judgement. I am not able to instruct a solicitor due to lack of funding.
2. **Breach of MPS Order:** Mr. Zahmoul has failed to make the MPS payments, and I have no money for food, for the children, and for our basic needs. Lila Mae and I must leave the London flat next week and will have nowhere to go. As mentioned in my email of 9th April, I have no home.
3. **Court Transcripts:** I need the transcripts of the Final Hearing but cannot afford to pay for them.

Request for Extension

I am respectfully requesting an extension to return the draft judgement with the clock starting only once I have been given a fair and equitable chance to have counsel who can take my instructions and once I have received MPS funds and can pay for food and basic necessities. I have not been able to prepare any corrections and material omissions because Mr. Brent Molyneux KC does not take direct instructions and because of my lack of funds. I am therefore in a position which is both unfair and unequitable and respectfully request an extension of the deadline to return the draft judgement until I have legal

Subject: IRS Criminal Investigation - Money Laundering
Date: Friday, April 12, 2024 at 9:32:21 AM Mountain Daylight Time
From: Nadia <nadia@rosekross.com>
To: CHALK, Alex <alex.chalk.mp@parliament.uk>
CC: MCLAIN, Paul <paul.mclain@parliament.uk>, FREEMAN, Lorraine <freemanl@parliament.uk>
Attachments: image001.png

Dear Alex,

I am sorry for the multiple emails, unfortunately my Outlook has a constraint of 25MB.

I wanted to share an additional material information.

The IRS Criminal Investigations Cyber Unit has an ongoing investigation since September 2023 into Mr. Zahmouli's criminal activities. I have all the referral information if you would like me to send it.

Special Agent [REDACTED] is in charge of the investigation and his contact details are below. He is the head of the IRS Criminal Investigations **Cyber Unit**, New York Field Office, and his focus is primarily on the **money laundering using cryptocurrency**. I am continuously in touch with Special Agent [REDACTED] and I upload information to the shared drive on a regular basis. The interest of Special [REDACTED] is narrowly focused on money laundering using cryptocurrency.

Karim has a deep knowledge of cryptocurrency, fixed income, currency, commodities and derivatives trading, international banking transactions, regulatory matters, credit & control. He runs a financial firm and rents a trading desk from Forte Securities. Karim started mining cryptocurrency in 2010 and forensic reports from several cryptocurrency experts (Dark Horse Intelligence, Cypherblade, and Another Day) provide documentary evidence that he uses **Mixers, Privacy Coins, DeFi** (Tornadoes, Bridges), **Peeling Chains, Monero**, all red flags of money laundering using cryptocurrency.

From 1994 to 1999, he was a fixed income trader at **Goldman Sachs**. He traded Russia, Ukraine, Poland, and Eastern European local currency debt. He was let go in 1998, amidst allegations of mismarking trading books. He has deep expertise in OFAC and FinCen sanctions. He is FCA approved and is on the Board of Directors of the Kazakh SPAC, representing them vis-à-vis Nasdaq and the SEC.

All these matters and those mentioned in my previous emails are of course outside the scope of Family Court.

The information I have in my possession indicates that Karim is assisting Russia (via Rakishev) launder funds, access the capital markets, and circumvent the OFAC, FINCEN and other sanctions which came in place following Russia's invasion of Ukraine in February 2022.

Please let me know if you would like any additional background information. I wish

you a great weekend.

With my kind wishes,
Nadia

From: [REDACTED] ci.irs.gov>

Date: Monday, April 8, 2024 at 7:40 PM

To: Nadia <nadia@rosekross.com>, [REDACTED]

Subject: RE: [EXT]Important new information

Hi Nadia,

Thanks for uploading the new information. Once we have had a chance to review it I will reach back out to set up a call to discuss any questions we have.

Thanks,

[REDACTED]

[REDACTED]
Special Agent
U.S. Department of the Treasury
IRS:CI | Cyber Investigations Unit
New York Field Office
[REDACTED]

From: Nadia <nadia@rosekross.com>

Sent: Monday, April 08, 2024 4:49 AM

To: [REDACTED]

[REDACTED] information

I hope you are well and had great Easter holiday.

The trial finished on 28 February 2024 and the judgement is reserved.

I have material new information which came to light during the course of the ten-day trial and immediately following the trial.

I have uploaded a substantial amount of new material to the shared Box drive and will be adding more documents over the next few days.

As you know, Mr. Zahmoul is on the Board of Directors of Oxus Acquisition

Corp. The SPAC completed its business combination with Borealis on 7th February 2024 and the new company was launched on Nasdaq under the ticker symbol BRLS. The majority owner and chairman of the board is Kenes Rakishev.

The documents I uploaded include proprietary information, open-source information, a timeline, and a power-point presentation.

Mr. Zahmoul is involved in money laundering for Kenes Rakishev, not only through the SPAC but also through other special purpose vehicles. Mr. Zahmoul is potentially using his London-based financial firm, Envirya Ltd, to facilitate investments on behalf of Rakishev, including cryptocurrency investments through his institutional relationship with Forte Securities.

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I have been advised to send the information to DOJ's recently launched "**KleptoCapture Task Force**" and I was given two contact names.

I also have a direct introduction to Hunter Biden through a very close friend. However, [REDACTED] has strongly recommended that I hold off and don't do anything until I hear from you.

I will continue to upload the new material over the next few days. [REDACTED] are available to speak at your convenience to discuss the new material.

With my kind wishes,
Nadia

BV20D01752

Veritas Numquam Perit
UK: +44 79 1332 8615
US: +1 424 426 9226

Nadia Zahmoul

Subject: BV20D01752 - Zahmoul
Date: Friday, April 12, 2024 at 9:41:22 AM Mountain Daylight Time
From: Nadia <nadia@rosekross.com>
To: karen.selby-king@justice.gov.uk <karen.selby-king@justice.gov.uk>
CC: Brent Molyneux KC <BMolyneux@29br.co.uk>, James Shortall <JShortall@29br.co.uk>
Priority: High
Attachments: image001.png

Dear Karen,

Please would you pass this on to the judge.

I apologize for the multiple emails, but it is very important that the court has all the information as I currently do not have legal representation and the children and I are in danger.

With my kind wishes,
Nadia

Dear judge,

I apologize for the multiple emails, however I am without funds and without legal representation and it is very important that the High Court Family Division has complete and accurate information regarding this case and the threats, intimidation, and risks to the children's safety and mine.

Sincerely,
Nadia Zahmoul

From: Nadia <nadia@rosekross.com>
Date: Friday, April 12, 2024 at 4:32 PM
To: "CHALK, Alex" <alex.chalk.mp@parliament.uk>
Cc: "MCLAIN, Paul" <paul.mclain@parliament.uk>, "FREEMAN, Lorraine" <freemanl@parliament.uk>
Subject: IRS Criminal Investigation - Money Laundering

Dear Alex,

I am sorry for the multiple emails, unfortunately my Outlook has a constraint of 25MB.

I wanted to share an additional material information.

The IRS Criminal Investigations Cyber Unit has an ongoing investigation since September 2023 into Mr. Zahmoul's criminal activities. I have all the referral information if you would like me to send it.

Special Agent [REDACTED] is in charge of the investigation and his contact details are below. He is the head of the IRS Criminal Investigations **Cyber Unit**, New York Field Office, and his focus is primarily on the **money laundering using cryptocurrency**. I am continuously in touch with Special Agent [REDACTED] and I upload information to the shared drive on a regular basis. The interest of Special Agent [REDACTED] is narrowly focused on money laundering using cryptocurrency.

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Please let me know if you would like any additional background information. I wish you a great weekend.

With my kind wishes,
Nadia

From: [REDACTED]
Date: Monday, April 8, 2024 at 7:40 PM
To: Nadia <nadia@rosekross.com>, [REDACTED]
Subject: RE: [EXT]Important new information

Hi Nadia,

Thanks for uploading the new information. Once we have had a chance to review it I will reach back out to set up a call to discuss any questions we have.

Thanks,
[REDACTED]

[REDACTED]
Special Agent
U.S. Department of the Treasury
IRS:CI | Cyber Investigations Unit
New York Field Office
[REDACTED]

From: Nadia <nadia@rosekross.com>
Sent: Monday, April 08, 2024 4:49 AM
To: [REDACTED]
Subject: [EXT]Important new information

[REDACTED]
I hope you are well and had great Easter holiday.

The trial finished on 28 February 2024 and the judgement is reserved.

I have material new information which came to light during the course of the ten-day trial and immediately following the trial.

I have uploaded a substantial amount of new material to the shared Box drive and will be adding more documents over the next few days.

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I also have a direct introduction to Hunter Biden through a very close friend. However, [REDACTED] has strongly recommended that I hold off and don't do anything until I hear from you.

I will continue to upload the new material over the next few days. [REDACTED] are available to speak at your convenience to discuss the new material.

With my kind wishes,
Nadia

BV20D01752

Veritas Numquam Perit
UK: +44 79 1332 8615
US: +1 424 426 9226

Nadia Zahmouli

Subject: Re: IRS Criminal Investigation - Money Laundering
Date: Tuesday, April 16, 2024 at 1:52:35 PM Mountain Daylight Time
From: CHALK, Alex <alex.chalk.mp@parliament.uk>
To: Nadia <nadia@rosekross.com>
CC: MCLAIN, Paul <paul.mclain@parliament.uk>, FREEMAN, Lorraine <freemanl@parliament.uk>
Attachments: image001.png

Dear Nadia,

Thank you for your emails. My apologies for emailing back a little late in the evening.

I would be happy to meet of course. In the meantime, I hope you will forgive me for emphasising what I'm sure you already know – namely that the serious allegations you make of money laundering and sanctions busting fall to be investigated by independent authorities. As I understand it, some of those allegations are already being considered by investigators in the United States. The same is true of allegations of modern slavery and prostitution; they are clearly very serious matters and I strongly advise you to pass these on to your UK-based lawyers and/or the police.

Your initial email also referenced your concerns about potential influence and corruption within the High Court. Because the judiciary too are independent, and as a politician I am constitutionally barred from intervening, I must invite you to contact the Judicial Conduct Investigations Office (JCIO) if you would like to take that further. I have copied the link here [Judicial Conduct Investigations Office · Customer Self-Service](#)

As I say, I would be happy to meet; but I just want to be clear that there are limits to what I can properly do to assist.

Thank you again for emailing.

Best wishes,

Alex

From: Nadia <nadia@rosekross.com>
Date: Friday, 12 April 2024 at 16:32
To: CHALK, Alex <alex.chalk.mp@parliament.uk>
Cc: MCLAIN, Paul <paul.mclain@parliament.uk>, FREEMAN, Lorraine <freemanl@parliament.uk>
Subject: IRS Criminal Investigation - Money Laundering

Dear Alex,

I am sorry for the multiple emails, unfortunately my Outlook has a constraint of 25MB.

I wanted to share an additional material information.

The IRS Criminal Investigations Cyber Unit has an ongoing investigation since September 2023 into Mr. Zahmoul's criminal activities. I have all the referral information if you would like me to send it.

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Please let me know if you would like any additional background information. I wish you a great weekend.

With my kind wishes,
Nadia

From: [REDACTED]
Date: Monday, April 8, 2024 at 7:40 PM
To: Nadia <nadia@rosekross.com>, [REDACTED]
Subject: RE: [EXT]Important new information

Hi Nadia,

Thanks for uploading the new information. Once we have had a chance to review it I will reach back out to set up a call to discuss any questions we have.

Thanks,

[REDACTED]
Special Agent
U.S. Department of the Treasury
IRS:CI | Cyber Investigations Unit
New York Field Office
[REDACTED]

From: Nadia <nadia@rosekross.com>
Sent: Monday, April 08, 2024 4:49 AM
To: [REDACTED]
<Ricardo.Bosch@ci.irs.gov>
Subject: [EXT]Important new information

[REDACTED]
I hope you are well and had great Easter holiday.

The trial finished on 28 February 2024 and the judgement is reserved.

I have material new information which came to light during the course of the ten-day trial and immediately following the trial.

I have uploaded a substantial amount of new material to the shared Box drive and will be adding more documents over the next few days.

As you know, Mr. Zahmoul is on the Board of Directors of Oxus Acquisition Corp. The SPAC completed its business combination with Borealis on 7th February 2024 and the new company was launched on Nasdaq under the ticker symbol BRLS. The majority owner and chairman of the board is Kenes Rakishev.

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The information uploaded relates to the following matters:

OFAC Ukraine sanctions

Access to capital markets for sanctioned entities.

Money laundering on behalf of kleptocrats.

Interference with 2024 US elections.

I have been advised to send the information to DOJ's recently launched "**KleptoCapture Task Force**" and I was given two contact names.

I also have a direct introduction to Hunter Biden through a very close friend. However, [REDACTED] has strongly recommended that I hold off and don't do anything until I hear from you.

I will continue to upload the new material over the next few days. [REDACTED] are available to speak at your convenience to discuss the new material.

With my kind wishes,
Nadia

BV20D01752

Veritas Numquam Perit

UK: +44 79 1332 8615

US: +1 424 426 9226

UK Parliament Disclaimer: this e-mail is confidential to the intended recipient. If you have received it in error, please notify the sender and delete it from your system. Any unauthorised use, disclosure, or copying is not permitted. This e-mail has been checked for viruses, but no liability is accepted for any damage caused by any virus transmitted by this e-mail. This e-mail address is not secure, is not encrypted and should not be used for sensitive data.

12TH MAY 2025

Nadia Zahmouli

Subject: URGENT: COURT OF APPEALS APPLICATION AND BUNDLE FOR URGENT SEALING (PART 3)

Date: Monday, May 12, 2025 at 5:03:45 AM Mountain Daylight Time

From: Nadia <nadia@rosekross.com>

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carla.denyer.mp@parliament.uk <carla.denyer.mp@parliament.uk>, charlie.dewhirst.mp@parliament.uk <charlie.dewhirst.mp@parliament.uk>, tan.dhesi.mp@parliament.uk <tan.dhesi.mp@parliament.uk>, jim.dickson.mp@parliament.uk <jim.dickson.mp@parliament.uk>, lee.dillon.mp@parliament.uk <lee.dillon.mp@parliament.uk>, caroline.dinenage.mp@parliament.uk <caroline.dinenage.mp@parliament.uk>, anna.dixon.mp@parliament.uk <anna.dixon.mp@parliament.uk>, Samantha.dixon.mp@parliament.uk <Samantha.dixon.mp@parliament.uk>, anneliese.dodds.mp@parliament.uk <anneliese.dodds.mp@parliament.uk>, helena.dollimore.mp@parliament.uk <helena.dollimore.mp@parliament.uk>, dave.doogan.mp@parliament.uk <dave.doogan.mp@parliament.uk>, stephen.doughty.mp@parliament.uk <stephen.doughty.mp@parliament.uk>, peter.dowd.mp@parliament.uk <peter.dowd.mp@parliament.uk>, oliver.dowden.mp@parliament.uk <oliver.dowden.mp@parliament.uk>, graeme.downie.mp@parliament.uk <graeme.downie.mp@parliament.uk>, rosie.duffield.mp@parliament.uk <rosie.duffield.mp@parliament.uk>, lain.duncansmith.mp@parliament.uk <lain.duncansmith.mp@parliament.uk>, neil.duncanjordan.mp@parliament.uk <neil.duncanjordan.mp@parliament.uk>, sarah.dyke.mp@parliament.uk <sarah.dyke.mp@parliament.uk>, eaglea@parliament.uk <eaglea@parliament.uk>, maria.eagle.mp@parliament.uk <maria.eagle.mp@parliament.uk>, alex.easton.mp@parliament.uk <alex.easton.mp@parliament.uk>, colum.eastwood.mp@parliament.uk <colum.eastwood.mp@parliament.uk>, sorcha.eastwood.mp@parliament.uk <sorcha.eastwood.mp@parliament.uk>, cat.eccles.mp@parliament.uk <cat.eccles.mp@parliament.uk>, lauren.edwards.mp@parliament.uk <lauren.edwards.mp@parliament.uk>, sarah.edwards.mp@parliament.uk <sarah.edwards.mp@parliament.uk>, damien.egan.mp@parliament.uk <damien.egan.mp@parliament.uk>, maya.ellis.mp@parliament.uk <maya.ellis.mp@parliament.uk>, chris.elmore.mp@parliament.uk <chris.elmore.mp@parliament.uk>, kirith.entwistle.mp@parliament.uk <kirith.entwistle.mp@parliament.uk>, florence.eshalomi.mp@parliament.uk <florence.eshalomi.mp@parliament.uk>, bill.esterson.mp@parliament.uk <bill.esterson.mp@parliament.uk>, chris.evans.mp@parliament.uk <chris.evans.mp@parliament.uk>, luke.evans.mp@parliament.uk <luke.evans.mp@parliament.uk>, miatta.fahnbulleh.mp@parliament.uk <miatta.fahnbulleh.mp@parliament.uk>, hamish.falconer.mp@parliament.uk <hamish.falconer.mp@parliament.uk>, nigel.farage.mp@parliament.uk <nigel.farage.mp@parliament.uk>

Priority: High

Attachments: INDEX.pdf, SECTION C.pdf.zip

Dear Court of Appeals,

Please find attached section C (Criminal activities, money laundering of prostitution proceeds) of the paginated, indexed bundle for urgent sealing.

Sincerely,
Nadia Zahmoul

VERITAS NUMQUAM PERIT
UK: +44 79 1332 8615
US: +1 424 426 9226

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION – ADMINISTRATIVE COURT

NADIA ZAHMOUL — CLAIMANT

v.

SECRETARY OF STATE FOR JUSTICE & OTHERS — DEFENDANTS

EXHIBIT B - MEDICAL EVIDENCE

Private and Confidential

26.03.2025

South K&C Crisis and Home Treatment Team
South K&C Mental Health Unit
1 Nightingale Place
London
SW10 9NG
Tel: 0203 838 7899
Email: cnw-tr.southkandchtt@nhs.net

Re: Mrs Nadia Zahmoul D.O.B: 28.04.1969

Date of Hearing: 31st March 2025

Dear Sir/Madam,

I am writing to inform the Court that Mrs Zahmoul is currently under the care of myself and my team, the South Kensington and Chelsea Crisis Resolution and Home Treatment Team (CRHTT), due to her experience of a mental health crisis. Mrs Zahmoul has been experiencing significant levels of agitation and poor sleep, which have been exacerbated by the stress of her current court case. Specifically, she reports great difficulty processing certain aspects of the proceedings, particularly regarding the evidence presented to her that she perceives as untrue.

In light of these challenges, we are providing her with intensive support to help her manage her difficulties, with the aim of ensuring she is well enough to attend the hearing scheduled for 31st March. We are committed to supporting her in this regard and hope to help her navigate this difficult time in a way that respects her mental health needs.

Nadia is due to meet with our psychologists soon in response to a query regarding whether she may exhibit symptoms of autism. This query is particularly pertinent as she has a first-degree relative with the same diagnosis. It is possible that these factors may influence how she perceives and processes the information provided during the court proceedings.

Given these circumstances, we would like to inquire if there is an advocacy service or any other appropriate support that could be made available to assist her in hearing and giving evidence at the hearing. Such support could ensure that she is able to fully engage with the proceedings in a manner that is fair and conducive to her well-being.

Thank you for your understanding and attention to this matter. Should you require any further information or clarification, please do not hesitate to contact me.

Yours faithfully,



Dr Leigh Poyser MBBS, MRCPsych
Consultant Psychiatrist

BRUCE HAYSE, M.D.
P.O.BOX 1884
JACKSON HOLE,
WYOMING 83001
OFFICE PHONE (307) 733-6700
FAX(307) 739-8890

October 17, 2025

To Whom It May Concern:

RE: Mrs. Nadia Zahmoul (D.O.8.: 04/27/1969)

I am Mrs. Zahmoul's treating physician in Wyoming, USA. She has attended several consultations with me since late September 2025, due to a significant deterioration in her mental health.

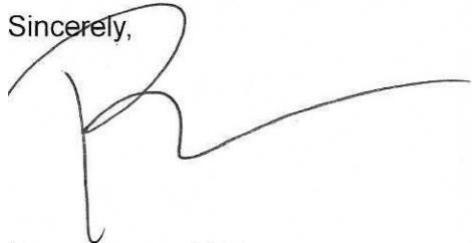
Mrs. Zahmoul has a documented history and diagnosis of Post-Traumatic Stress Disorder (PTSD) and a confirmed diagnosis of Autism Spectrum Condition (DSM-5 299.00; diagnosed June 2025 by Central London Adult Service, NHS UK)

She is presently experiencing a relapse in her mental health, characterized by heightened anxiety, emotional distress, and difficulty regulating stress-particularly in connection with ongoing UK court proceedings.

In my clinical opinion, Mrs. Zahmoul requires participation and communication support measures to ensure she can engage meaningfully and safely with the legal process. I would recommend that the Court consider appropriate reasonable adjustments consistent with her mental health and neurodevelopmental needs.

Please do not hesitate to contact me should further information be required.

Sincerely,

A handwritten signature in black ink, appearing to read "B.H.", which is likely the initials of Bruce Hayse, M.D.

Bruce Hayse, M.D.

St. John's Health
625 E Broadway, Jackson, WY 83001
(307) 733-3636

Discharge Instructions (Patient)

Name: ZAHMOUL, NADIA **Current Date:** 11/28/2025 17:57:58 America/Denver

DOB: 4/27/1969 **MRN:** 2018366 **FIN:** 5001152770

Diagnosis: 1:Hematuria; Abdominal pain - cause unknown

Visit Date: 11/28/2025 16:33:24 America/Denver

Address: 3093 Arrow Head Rd JACKSON WY 83025

Phone: (424) 426-9226

Primary Care Provider:

Name:

Phone:

Emergency Department Providers:

Primary Physician:

Stoecklein, Holbrook St. John's Health would like to thank you for allowing us to assist you with your healthcare needs. The following instructions include patient education materials and information regarding your injury/illness.

ZAHMOUL, NADIA has been given the following list of follow-up instructions, prescriptions, and patient education materials:

Follow-up Instructions:

With:

Address:

When:

Return to Emergency
Department

Within 1 to 2 days,
only if needed

Comments:

Return to ED if symptoms worsen

BRUCE HAYSE, M.D.
P.O. BOX 1884
JACKSON HOLE, WYOMING 83001
OFFICE PHONE (307) 733-6700
FAX (307) 739-8890

November 25, 2025

Re: Zahmoul, Nadia (D.O.B: 04.27.1969)

Dear Sir/Madam:

I am writing to inform the Court that Mrs. Zahmoul is under my care in Jackson Hole, Wyoming. Mrs. Zahmoul is currently clinically vulnerable due to prolonged uncertainty and lack of clarity around ongoing legal proceedings in the United Kingdom. In recent months, she has experienced several mental health crises, emotional breakdowns, episodes of acute distress, functional impairment, and heightened anxiety. She reports significant levels of agitation, poor sleep, emotional dysregulation, and difficulties with daily functioning and self-care.

Mrs. Zahmoul has Autism Spectrum Condition (ASC) and Post-Traumatic Stress Disorder (PTSD), with co-occurring mental health conditions. In addition, she has Sjögren syndrome, an auto-immune disorder, and has experienced severe flares recently which required medical management.

I am aware of an upcoming court hearing in the United Kingdom and am very concerned for Mrs. Zahmoul's wellbeing and safety. It is important that the court process considers her communication and information-processing needs so that she can participate safely and on an equitable basis. In the past, her difficulties with the opacity and ambiguity of the legal process caused her severe distress, resulting in two hospitalizations in London in March and June 2025 for mental health crises. Mrs. Zahmoul's participation in any legal process requires appropriate adjustments and measures to ensure that she is able to fully engage with the proceedings in a manner that is fair and conducive to her well-being.

I refer to the NHS Autism Assessment Report of July 1st, 2025, which states that she requires "direct, clear, structured, and transparent communication." The NHS also provided a report for the courts addressing her autistic needs and challenges in the ongoing legal proceedings: "Mrs Nadia Zahmoul's Autism Diagnosis and Recommendations for Reasonable Adjustments" (July 3rd, 2025).

Mrs. Zahmoul has reported that the court's pattern of administrative silence and opaque processes have caused her acute distress, emotional instability, and several episodes of mental health breakdowns. This was exacerbated by the withdrawal of participation measures that were previously in place to support her in the court process. The NHS report states: "Nadia has reported significant distress following the recent withdrawal of previously granted accommodations in court, which has impacted her ability to express herself effectively. We strongly recommend that the above adjustments be implemented consistently throughout the remainder of the proceedings."

Given her severe deterioration and safeguarding risk, I am concerned that any delay

in resolving the outstanding legal matters poses a significant risk of further health deterioration and may lead to the need for hospitalization if her condition worsens.

In my opinion, Mrs. Zahmoul requires a structured, direct, transparent court hearing with appropriate participation measures to prevent further deterioration. An oral, in-person hearing—scheduled as soon as reasonably possible—is clinically indicated, as it would provide the clarity, structure, and interactive communication required to stabilize her condition. This is medically necessary to prevent further deterioration and to allow Mrs. Zahmoul to participate safely in the proceedings. Court processes that are opaque or ambiguous such as paper-based decisions or remote hearings, administrative silence, court delays, and procedural lack of clarity would be medically unsafe given her current mental health state and could precipitate a major destabilization.

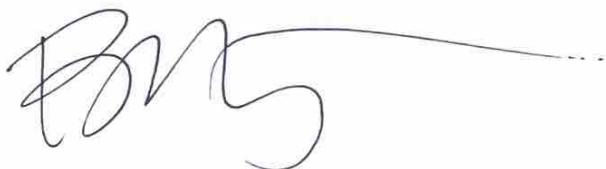
Thank you for your understanding and attention to this matter. Should you require any further information or clarification, please do not hesitate to contact me.

Mrs. Zahmoul is fit to travel to the UK for a court hearing provided that:

- the hearing is scheduled expeditiously,
- reasonable adjustments are made (clear communication, structured timetable, breaks as needed), and
- she is permitted appropriate support.

Any prolonged delay or remote determination would be medically unsafe.

Sincerely,

A handwritten signature in black ink, appearing to read "BH".

Bruce Hayse, M.D.

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION – ADMINISTRATIVE COURT

NADIA ZAHMOUL — CLAIMANT

v.

SECRETARY OF STATE FOR JUSTICE & OTHERS — DEFENDANTS

EXHIBIT C: ADMINISTRATIVE VS JUDICIAL ACTS ANALYSIS

EXHIBIT B-1
Legal Analysis: Administrative vs Judicial Acts

(Why HMCTS’s “this is judicial” deflection is wrong as a matter of law)

1. Purpose of this Exhibit

This Exhibit clarifies the distinction between **judicial acts** (NOT reviewable by JR) and **administrative acts or omissions** (reviewable by JR).

HMCTS’s letter of 14 November 2025 misclassified multiple administrative failures as “judicial” in order to avoid scrutiny.

This Exhibit shows why that position is **legally incorrect**.

PART A — THE LEGAL DISTINCTION

1. Judicial acts

(NOT reviewable under JR)

A judicial act is one that meets all of the following:

- a) performed by a judge,
- b) in the exercise of judicial discretion,
- c) recorded or delivered as a judgment or order,
- d) Following a hearing or response procedure,
- e) with reasons (even brief) or a determinative ruling.

Examples:

- a) A judge’s judgment

- b) An order after a hearing
- c) A ruling on an application

These are immune from JR (except on limited grounds).

2. Administrative acts

(FULLY reviewable under JR)

An act is administrative if it is:

- a) performed by court staff, HMCTS, MoJ, or any public body other than a judge,
- b) operational, procedural, logistical, or clerical,
- c) about how evidence, records, applications, or safeguarding duties are handled,
- d) about logging, transmitting, or escalating material,
- e) about chain of custody or case management,
- f) not recorded as a judicial decision,
- g) not documented as a judicial determination.

Administrative functions must comply with:

- a) public law duties,
- b) Equality Act 2010 (PSED),
- c) safeguarding duties,
- d) evidence-handling obligations,
- e) operational standards.

These actions are reviewable in Judicial Review.

PART B — APPLYING THE DOCTRINE TO THE CASE

HMCTS incorrectly claimed that three issues were “judicial”:

- a) Withdrawal of FPR Part 3A participation measures
- b) Disability discrimination / Equality Act breaches
- c) Non-handling of criminal evidence

Legally, all three are administrative, because:

1. Withdrawal of Part 3A measures was administrative, not judicial

To be a judicial act, withdrawal of Part 3A measures must include:

- a) a hearing, and
- b) a judge deciding, and
- c) an order, and
- d) reasons.

In this case:

- a) there was no hearing
- b) no order
- c) no judicial determination
- d) no reasons
- e) no record
- f) no procedural fairness
- g) no judicial engagement of any kind

Therefore:

****This was not a judicial decision.**

It was an administrative failure to maintain, record, or implement your participation measures.

It is 100% JR-reviewable.**

2. Equality Act breaches and PSED failures are never judicial acts

The PSED applies to:

- a) HMCTS staff
- b) MoJ
- c) All administrative functions of the Courts

It does not attach to judicial decision-making.

Therefore, PSED breaches:

- a) occur at the administrative level,
- b) involve operational failings,
- c) are fully reviewable under JR.

When HMCTS claimed “this is judicial.” they were legally incorrect.

3. Handling criminal evidence is purely administrative

Judges do not:

- a) log evidence,
- b) maintain chain of custody,
- c) escalate criminal submissions,
- d) ensure safeguarding protocols,
- e) process incoming evidence,
- f) acknowledge submissions.

These are HMCTS/MoJ operational duties.

All failures to:

- log,
- transmit,
- escalate,
- preserve,
- secure, or
- respond

are administrative omissions.

Therefore:

Criminal-evidence suppression is reviewable by JR.

PART C — WHY HMCTS'S 14 NOVEMBER LETTER STRENGTHENS THE JR

HMCTS's misclassification proves that:

- a) they never understood their duties,
- b) they never conducted an administrative assessment,
- c) they never logged or examined your submissions,
- d) they attempted to shield administrative failures behind “judicial immunity”,
- e) they violated public-law principles.

In JR terms, this is:

- a) **maladministration**,
- b) **irrationality**,
- c) **error of law**,
- d) **misdirection**, and

- e) failure to take into account relevant considerations.

This Exhibit demonstrates clearly that **my JR grounds fall squarely within administrative jurisdiction.**

PART D — SUMMARY FOR THE COURT

No judge made any decision on:

- a) revoking Part 3A measures,
- b) logging criminal evidence, or
- c) safeguarding duties.

The failures occurred in HMCTS/MoJ operational processes, not judicial processes.

Judicial Review is the correct procedure.

HMCTS's misclassification itself is:

- a) an error of law,
- b) a public-law failure,
- c) further evidence that administrative duties broke down.

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION – ADMINISTRATIVE COURT

NADIA ZAHMOUL — CLAIMANT

v.

SECRETARY OF STATE FOR JUSTICE & OTHERS — DEFENDANTS

EXHIBIT D: DISABILITY/AUTISM ASSESSMENT EVIDENCE (CLAAS)

Private and Confidential

26.03.2025

South K&C Crisis and Home Treatment Team
South K&C Mental Health Unit
1 Nightingale Place

London

SW10 9NG

Tel: 0203 838 7899

Email: cnw-tr.southkandchtt@nhs.net

Re: Mrs Nadia Zahmoul D.O.B: 28.04.1969

Date of Hearing: 31st March 2025

Dear Sir/Madam,

I am writing to inform the Court that Mrs Zahmoul is currently under the care of myself and my team, the South Kensington and Chelsea Crisis Resolution and Home Treatment Team (CRHTT), due to her experience of a mental health crisis. Mrs Zahmoul has been experiencing significant levels of agitation and poor sleep, which have been exacerbated by the stress of her current court case. Specifically, she reports great difficulty processing certain aspects of the proceedings, particularly regarding the evidence presented to her that she perceives as untrue.

In light of these challenges, we are providing her with intensive support to help her manage her difficulties, with the aim of ensuring she is well enough to attend the hearing scheduled for 31st March. We are committed to supporting her in this regard and hope to help her navigate this difficult time in a way that respects her mental health needs.

Nadia is due to meet with our psychologists soon in response to a query regarding whether she may exhibit symptoms of autism. This query is particularly pertinent as she has a first-degree relative with the same diagnosis. It is possible that these factors may influence how she perceives and processes the information provided during the court proceedings.

Given these circumstances, we would like to inquire if there is an advocacy service or any other appropriate support that could be made available to assist her in hearing and giving evidence at the hearing. Such support could ensure that she is able to fully engage with the proceedings in a manner that is fair and conducive to her well-being.

Thank you for your understanding and attention to this matter. Should you require any further information or clarification, please do not hesitate to contact me.

Yours faithfully,



Dr Leigh Poyser MBBS, MRCPsych
Consultant Psychiatrist

Central London Adult Autism Service (CLAAS)
LBHF| RBKC | Westminster

Westminster: 215 Lisson Grove, NW8 8LW

LBHF: 56 Bloemfontein Road, W12 7FG

RBKC: 1-9 St Marks Rd, W11 1RG

0208 102 3889

clcht.claas@nhs.net

www.clch.nhs.uk

Private and confidential

Mrs Nadia Zahmoul
35 Queens Gate Gardens,
London SW7 5RR
(sent via normal email with consent: nzahmoul@me.com)

Date: 20/06/2025

To Whom It May Concern,

Re: Autism Assessment Outcome for Mrs Nadia Zahmoul; Date of Birth: 27 Apr 1969

We are writing to confirm that Mrs Nadia Zahmoul has a confirmed diagnosis of **Autism Spectrum Condition (ASC)**, according to the Diagnostic and Statistical Manual for Mental Health Disorders, Fifth Edition (DSM-5), from our service, **Central London Adult Autism Service (CLAAS)**. The assessment was led by Dr Catherine Cheung (Principal Clinical Psychologist; HCPC Registration Number: PYL32865).

Diagnosis of Autism Spectrum Condition (ASC; DSM-5: 299.00; ICD-10 Code: F84.0)

Our assessment protocol is based on recommendations in The National Institute of Health and Care Excellence (NICE) Guidance for adult autism assessments, and our findings concluded that she does meet diagnostic criteria for ASC, according to the DSM-5.

This means that Nadia was born with this condition, but unfortunately, she was only formally diagnosed in our service in June 2025. A neurodevelopmental condition is pervasive and lifelong. The National Autistic Society (NAS) describes Autism as a “neurodevelopmental disability”. This means that **Nadia has always been and will continue to be autistic for the rest of her life**.

Being autistic significantly impacts Nadia’s ability to cope with the demands of day-to-day living. By definition of the diagnosis, she demonstrates **genuine, significant differences (or**

difficulties) in social communication and understanding and managing social relationships, which can give rise to **challenges in managing social interactions and situations** (e.g., difficulty expressing her needs or comprehending other people's information sharing, social isolation). Without the appropriate support for her autistic communication, Nadia struggles to effectively share information about herself, respond to others' questions and comments, and engage in interactive settings. This can also give rise to unintentional misunderstandings and place her at a disadvantage.

Please note that Nadia's communication and relationship challenges are autistic in nature. However, she can communicate using sophisticated vocabulary and grammar, which can generate the false impression that she is managing better than she is. Her challenge lies in the pragmatic use of language to effectively communicate and interact with others.

Additionally, Nadia continues to experience high levels of anxiety and distress daily, usually triggered by everyday problems of daily living and the challenges of managing social communication, which require continued support and reassurance.

Being autistic also significantly impacts Nadia's **information-processing style**: there is a **genuine need for familiarity, structure, and predictability**. This is both external and internal. Externally, unfamiliar people, places and settings can be significantly upsetting for Nadia; she often needs a lot longer to familiarise herself and settle down. Internally, Nadia has very **specific or defined ways of thinking or understanding information** and needs significantly more time and effort to process new information or engage with new approaches. Information that does not fit in directly with Nadia's way of thinking or understanding can again be extremely confusing and distressing for her.

Because of her disability and autistic needs, Nadia is entitled to support and reasonable adjustments. This will allow her to meaningfully participate in court and to ensure that her experiences and preferences are effectively and reliably presented during any legal proceedings. We will later provide a letter of clinical recommendation for accommodation and adjustments to Nadia's communication and information processing style.

Warmest Regards,

Electronically signed and delivered to avoid delays.

Dr Catherine Cheung
Principal Clinical Psychologist
Central London Adult Autism Service (CLAAS)

Sophia Iacovou
Assistant Psychologist

Cc: Nadia Zahmoul;

GP – Stanhope Mews West Surgery (stanhope.mews@nhs.net)

NHS No.: 705 199 5111
DoB: 27 Apr 1969



Central London Adult Autism Service (CLAAS)
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NHS No.: [REDACTED]
DoB: 27 Apr 1969

Private & Confidential

Mrs Nadia Zahmoul

35 Queens Gate Gardens
London
SW7 5RR
(sent via email with consent: nzahmoul@me.com)

Date: 01/07/2025

Autism Assessment Report

Dear Nadia,

Thank you for meeting with us for the autism assessment on Thursday 15th May 2025. You were referred to the Central London Adult Autism Service (CLAAS) in April 2025 by Tamara Moon, Senior Assistant Psychologist at the South Kensington and Chelsea Home Treatment Team (HTT). It was hoped that an autism assessment could help you to understand your communication and processing needs and guide any adjustments for your ongoing divorce court case.

Our report focuses on key autism-related information and should be read in conjunction with existing reports to gain a comprehensive understanding of your background, life experiences and psychosocial and health needs.

Assessment Process

Our assessment was guided by the recommendations in the National Institute for Health and Care Excellence (NICE) Guidance for adult autism assessments and employed the following sources of information:

- Information provided by **Tamara Moon (Senior Assistant Psychologist)** on your current circumstances, difficulties and needs through your engagement with the **Home Treatment Team**. This was obtained through the completion of the referral form.
- An in-person clinical interview with **Dr Catherine Cheung (Principal Clinical Psychologist)** and **Sophia Iacovou (Assistant Psychologist)** on 15/05/2025. The

purpose of this meeting was to help gain a better understanding of your current circumstances and concerns.

- Behavioural observations guided by the **Autism Diagnostic Observational Schedule, 2nd Edition (ADOS-2)** was conducted in the same meeting. This allowed us to observe your communication style, social reciprocity, and behavioural patterns.
- Information regarding your social experiences, interests, thinking patterns, and sensory sensitivities was gathered through the **Ritvo Autism Asperger Diagnostic Scale - Revised (RAADS-R)** questionnaire. This form was self-completed by you using a virtual form.
- Ongoing collaboration with other professionals involved in your care, including a meeting with your referrer, **Tamara Moon (Senior Assistant Psychologist)** from the **South Kensington and Chelsea Home Treatment Team (HTT)**. These discussions contributed to a more comprehensive understanding of your circumstances and challenges within the broader context of your mental health.

Diagnostic Outcome

We concluded that **you are autistic**. We discussed this outcome with you on Thursday 12th June 2025 during a follow-up virtual meeting. You shared that this diagnosis came as a relief, and you hoped it may offer a helpful template to make sense of your experiences and difficulties. You described your long journey in self-understanding and finally recognising that you are not “deficient” but, rather, processing information differently.

Without appropriate support, autistic individuals can face significant challenges in their daily lives, which can affect their physical and emotional well-being. For example, you shared insightful reflections around how your deep and detail-oriented attention can be difficult and exhausting to manage at times.

Co-Occurring Diagnoses and Difficulties

A diagnosis of autism does not discount for the adverse life experiences impacting your sense of self and emotional well-being, which were also considered throughout your autism assessment process. You reported having **Post-Traumatic Stress Disorder (PTSD)** as a result of a series of adverse life events (e.g., witnessing 9/11 attacks in close proximity). Your self-reported experience of PTSD has been consistently recorded throughout your medical record, and is something that you have discussed with multiple healthcare professionals.

We also gathered information about how such experiences have impacted your current mental health and functioning through professional liaison with professionals involved in your care at the South Kensington and Chelsee HTT. You are thoughtful and recognised the interplay between your PTSD symptoms and autistic needs. Together, we discussed how some of your behaviours or responses might be coping strategies that you have developed over time to deal with challenging situations.

We also discussed how, during periods of heightened stress, your autistic needs can become more pronounced, making it harder to communicate effectively. For example, you may feel compelled to share thoughts or experiences that are most pressing for you, even if they seem

unrelated to the immediate context. This can also affect your ability to take on others' perspectives or advice, as your capacity for cognitive flexibility may be reduced in these moments, despite your motivation to engage meaningfully.

Services should hold in mind your neurodivergent traits, your mental health needs relating to adverse life experiences and your psychosocial context, and employ an Autism- and Trauma-Informed Approach when working with you.

Current Context and Ensuring Equity in Legal Proceedings

You are currently staying in a friend's flat in Kensington and managing your divorce proceedings without legal representation due to financial constraints. Preparing documents and engaging with the court process has been highly demanding and distressing. While helpful adjustments were made during the hearing phase (e.g., regular breaks, advocacy against harmful questions), these have since been withdrawn, despite the negotiation phase continuing to place significant demands on you. This, alongside financial and emotional strain, has negatively impacted your wellbeing. You described difficulty sleeping, teeth grinding, regular emotional breakdowns, and heightened anxiety.

Given your recent autism diagnosis, it is important that the court process considers your communication and information-processing needs so that you can participate on an equitable basis. The current structure and expectations of legal proceedings do not align well with your communication style, which can make it difficult for you to express yourself clearly or provide information in the way that is typically expected. This has understandably caused you significant distress, as noted in your recent contacts with health and wellbeing services. Reasonable adjustments - such as allowing you to communicate in alternative formats, giving you extra time to process and respond, and supporting you to organise your thoughts - may help you engage more effectively and fairly in the legal process.

A separate letter, addressed to the court, will be provided to outline your autistic needs and our recommendations for reasonable adjustments.

Risk and Mental Health

You were referred to us by the South Kensington and Chelsea Home Treatment Team (HTT), a crisis service, following a period of acute stress during which you believed you had been poisoned. While under the care of the HTT, you had regular meetings with clinicians. It was recognised that although the psychological impact of your trauma is significant, there were no concerns about active risk of harm to yourself or others.

During the autism assessment and follow-up meetings, we observed increasing levels of distress, which have affected your ability to maintain consistent self-care, sleep and eat well, and regulate your emotions. You spoke openly about these challenges, attributing much of your distress to the ongoing legal proceedings and the withdrawal of reasonable adjustments by the court.

Although you reported no current thoughts or plans to harm yourself or others, you acknowledged that your recent mental health difficulties have been more acute and impactful. You expressed a desire to access support to help stabilise your mental health. Following our post-diagnostic meeting on 19th June 2025, you confirmed your wish to engage with crisis services. We subsequently referred you to your local Single Point of Access (SPA) team, and you are now receiving support from the HTT.

Autism Profile

We recognised various autistic features in your social approach. This means that there are *marked differences* in how you communicate, approach social situations and process information. We also noticed *marked differences* in your daily approach and information processing styles that are consistent with an autism profile. These differences include:

Verbal Communication	
Expressive verbal communication	You express yourself with passion, particularly when discussing topics that are important to you. Your speech was often quicker than expected during our meetings and could involve extended, detailed monologues. While meaningful to you, this style of speech may mean that others may find it difficult to interject or follow your main point.
Formal, metaphorical, or repetitive language	You often use formal, analytical, or metaphorical language, and may repeat specific phrases or concepts. For example, you were keen to share how the “hyper analytical” processing style resonates with you and repeated words such as “microcosm” and “surreal” a number of times during our assessment. While this language is meaningful to you, it may make it difficult for those unfamiliar to you to interpret your intended meaning.
Turn-taking and gauging conversational expectations	It may be less intuitive for you to judge when to start or stop speaking, or how much detail to include. This can make conversational turn-taking more effortful. For example, during the assessment, you sometimes responded to personal questions with detailed theoretical content, which could be longer or less directly relevant than expected. Clear prompts and feedback can help to clarify expectations and prompt you to share relevant information.
Non-verbal Communication	
Interpreting social cues	Interpreting others’ emotions, intentions, or cues can be effortful. You may not always pick up on more subtle cues (e.g., whether a listener is struggling to follow), and you thrive when this information or feedback is offered more clearly. In unfamiliar or formal settings (e.g., courtrooms), this may impact how your reactions or participation are received by others.
Use of non-verbal communication cues	Your non-verbal communication (e.g., eye contact, gestures, body language, vocal tone) may not always be as well-meshed with your internal state or the social context as may be expected. For example, you may hold strong brief eye contact, punctuated by looking around the room. Your gestures and body language may also seem more animated or jerky than expected.

Communication Preferences and Support Needs	
Preference for direct communication	You prefer communication that is direct and transparent. Vague, contradictory, or unclear language can be distressing. For example, you described finding the innuendo and ambiguous communication of the court room very stressful. You also mentioned that in the past it has been helpful when workplace bosses offer you clear and direct feedback.
Strong sense of fairness and justice	You described a strong sense of justice and rule-based thinking. This can mean that when you perceive dishonesty or unfairness in social settings, you may become distressed and find it difficult to engage or negotiate.
Difficulty “reading between the lines”	Inferring unspoken intentions or navigating ambiguity in social or legal interactions can be challenging. For example, during our meetings, it seemed difficult to gauge how much information was appropriate to share or which questions were appropriate to ask.
Emotional Expression and Regulation	
Emotional recognition and expression	You experience emotions intensely and may find it difficult to regulate or express them in ways that others expect. When emotionally heightened, your communication may become more intense or expressive (e.g., through tone, movement, or language). This reflects your intention to be understood but could lead to misinterpretations by others.
Emotional regulation	Though you expressed difficulties with regulating your emotions when experiencing heightened stress, you show strong insight and commitment to managing these challenges. You described routinely seeking time alone to self-regulate, a strategy you have used throughout your life. More recently, you have also proactively accessed support through mental health services. These are important strengths that support your ability to navigate emotionally difficult situations.
Social Relationships	
Making and maintaining relationships	You described a very limited social circle during your younger years, often preferring to focus on schoolwork rather than forming relationships with your peers. Though you have developed social skills and navigated social spaces (e.g., the office environment) over the years, you described often seeking alone time.
Information Processing Style	
Analytical, rule-based thinking	You tend to create internal rules to make sense of the world, which you refer to as your “hyper analytical” style of thinking. This makes ambiguity or contradiction difficult to process, creating a sense of distress and, in some cases, contributing to breakdowns. You also mentioned that emotions can be difficult to make sense of, as they “do not fit inside the rules”. This can make it difficult for you to connect with nuances.
Detail-focused memory	You have a strong attention to and memory for details. You are able to recall information - including research, life events, or procedural details - in great

	detail. This strength can support you in structured or evidence-based environments, but may also contribute to cognitive overload.
Preference for structure and predictability	You are aware of your need for structure and clarity, and you thrive when expectations are clearly defined. Unfamiliar or unstructured environments can be more challenging to navigate.
Immersive Interests	
Deep focus on specific topics	You described your interest on topics as “intense”, often consuming most of your waking hours. Previously, you have been very interested in education and special needs. Currently, you spend an extensive amount of time reading legal documents - you are able to recall large amount of information and texts of your research.
Difficulty shifting focus	When engaged in your interests or sharing your interest with others, you often become deeply focused. This can make it difficult to shift your focus. For example, you described currently having little time for self-care and emotional regulation activities as you spend much of your time engaged in matters relevant to your court case.
Sensory Sensitivities and Regulation	
Sensory sensitivities	High-stimulation environments (e.g., court room, busy spaces) can be overwhelming. You may benefit from quiet spaces and sensory tools to self-regulate (e.g., movement, tactile objects like putty). You also mentioned that time alone has helped you throughout your life to regulate.
Sensory-seeking behaviour	During our meetings you engaged in a number of sensory seeking behaviours, such as flexing and clenching your hands and fingers, repetitively touching your face and head, and twisting your legs together. These actions may provide distinct sensory feedback, which can function as a way to self-soothe.

Your Strengths and Capabilities

While this report focuses your autistic needs, it is equally important to highlight your many strengths. You are highly intelligent, motivated, and passionate, with a strong sense of justice and commitment to your children. Your information processing style is analytical, which you have applied in previous professional roles and are currently using to navigate complex legal processes. Your care for your children was clearly expressed throughout our assessment, and you spoke warmly about your relationship with them.

Your autistic traits do not directly correlate to your parenting capability. Rather, your communication and information-processing style are part of your neurodivergent profile. When understood and supported appropriately, you are able to engage meaningfully and effectively.

Recommendations and next steps

Support from CLAAS

Post-diagnosis Support Sessions

We initially planned to meet for 2–3 post-diagnostic support sessions, focusing on developing strategies for emotional regulation and exploring helpful thinking patterns. You expressed openness and motivation to engage in these sessions.

However, following our first session, we jointly recognised that, given your current circumstances and the high levels of stress you are experiencing, it was difficult for you to engage meaningfully in post-diagnostic support at this time. You were insightful and open in acknowledging this, and we agreed that your primary need at present is mental health support rather than autism-focused input.

We understand that your situation has become particularly challenging in recent weeks, and you are now receiving support from crisis mental health services, who are helping you work towards greater stability and wellbeing. Once your circumstances have stabilised, and if you wish to re-engage, we would be open to re-opening your case to continue with autism-focused post-diagnostic support through CLAAS.

In the meantime, we have agreed to provide a supporting letter for the court to assist you in accessing reasonable adjustments. This letter will be sent to you virtually via email.

Liaison with other services

We are aware of your recent contact with mental health services and understand that you are currently receiving support from the South Kensington and Chelsea Home Treatment Team (HTT) following a referral to the CNWL Single Point of Access (SPA), made by us at CLAAS following a meeting in which we discussed your current difficulties.

We have been in contact with mental health services, including the CNWL Single Point of Access (SPA) and South Kensington and Chelsea (K&C) Community Mental Health Hub (CMHH) to share our concerns about your mental health and safety, and our understanding of your autistic needs in the current context.

Our service is not an emergency service. We do not care coordinate or offer ongoing support. However, we will continue to ensure you are safe and communicate your psychosocial needs to the relevant services, with the hope that you can access appropriate support.

Autism Advice Clinic

We host a regular **Autism Advice Clinic**. These are 20 to 30-minute virtual slots for informal chats, advice-giving or signposting to other services. Please see the attached invitation letter and contact us to book an appointment.

Autism consultation and advice for professionals

We will remain in contact with your care teams and attend professional meetings. We can also provide **autism-specific consultation** to any professional supporting you. These are usually to provide specialist advice around supporting your autistic needs.

Recommendations for autism-related resources

Websites and online resources:

- There is useful information to be found on the National Autistic Society's website (<http://www.autism.org.uk/living-with-autism/adults-with-autism-or-asperger-syndrome/useful-resources.aspx>).
- **The Centre for ADHD and Autism (CAAS)** is a third-sector organisation that can advise on your autistic needs and support practical tasks in the community. Please visit this link for more information: <https://adhdandautism.org/services/adults/> or contact the local representative, Laura Nettleford (laura@adhdautism.org).

Books:

- [Unmasking Autism](#), Devon Price
- [Looking After Your Autistic Self: A Personalised Self-Care Approach to Managing Your Sensory and Emotional Wellbeing](#), Niamh Garvey
- [An Adult with an Autism Diagnosis: A Guide for the Newly Diagnosed](#), Gillian Drew
- [The Guide to Good Mental Health on the Autism Spectrum](#), Emma Goodall and Jane Nugent. Forewords by Wenn Lawson and Kirsty Dempster-Rivett Jeanette Purkis
- [The Independent Woman's Handbook for Super Safe Living on the Autistic Spectrum](#), Robyn Steward
- [Women on the Spectrum: Walking to the Beat of Autism](#), Barb Cook and Dr Michelle Garnett

Jessica Kingsley Publishers is one of the largest publishing houses on autism-related books.

Podcasts:

- Robyn Steward - <https://www.bbc.co.uk/programmes/p06sdq0x>
- John Offord - <https://anchor.fm/differentminds/episodes/How-it-feels-to-be-diagnosed-with-Autism-later-in-life-en6qhb>

General information about CLAAS

Our service **does not** offer ongoing psychological therapy or social care provision or case management. However, we can support you in accessing services.

- **Psychological support** for ongoing or co-morbid mental health needs. We can support you in being referred to **mental health services** (e.g. IAPT, CMHT) as appropriate via the GP.
- If there are concerns about daily functioning and independent living, a referral to **Adult Social Care Services** is recommended to see if there are needs eligible under the Care Act.

NHS No.: [REDACTED]
DoB: 27 Apr 1969



- If in **crisis** or feeling unsafe, please contact the **GP** or the **CNWL Single Point of Access** on 0800 0234 650 or attend the nearest **A&E**. The **Samaritans** also offers a helpline on 116 123 or jo@samaritans.org for difficult times.

We will close your case to mark the completion of your Autism assessment. Where appropriate, our service remains available for ad-hoc professional consultation and joint-working with other professionals or services.

Yours sincerely,

Electronically signed and delivered to avoid delays.

Sophia Iacovou

Assistant Psychologist

Dr Catherine Cheung

Principal Clinical Psychologist

Central London Adult Autism Service

CC: Referrer: South K&C Home Treatment Team, cnw-tr.southkandchtt@nhs.net

GP: Stanhope Mews West, stanhope.mews@nhs.net

CLAAS File

Private & Confidential

Mrs Nadia Zahmoul

35 Queens Gate Gardens
London
SW7 5RR
(sent via email with consent: nzahmoul@me.com)

Date: 03/07/2025

To whom it may concern,

RE: Mrs Nadia Zahmoul's Autism Diagnosis and Recommendations for Reasonable Adjustments; NHS No.: [REDACTED]; DoB: 27 Apr 1969

1. Context

I am writing in my capacity and clinical role as Principal Clinical Psychologist and Service Lead at the Central London Adult Autism Service (CLAS), Central London Community Healthcare NHS Foundation Trust.

This letter aims to summarise Nadia's Autism diagnosis and recommendations for reasonable adjustments. Nadia was seen in our service for an Autism diagnostic assessment, following a referral to us from our colleagues in NHS mental health services.

Please note that this is purely a clinical letter to support understanding of Nadia's autistic needs and recommend reasonable adjustments to enable equitable participation in court proceedings.

This letter does not intend to provide expert evidence or offer an opinion on legal matters or facts of the case. Should such information be required, an independent expert witness should be separately instructed.

2. Confirmation of Autism Diagnosis

Nadia has a formal diagnosis of Autism under the DSM-5 criteria. Autism is internationally recognised as a neurodevelopmental condition. This means that Nadia was born autistic and will be for life. Autism affects social communication, information processing, and sensory experiences. While it is considered a form of neurodivergence rather than a disability, it qualifies as a “disability” due to the significant differences autistic individuals presents in the aforementioned domains, which can lead to significant challenges and poorer functioning when a lack of appropriate support is in place. However, this diagnosis has no implication on a person’s intellectual abilities. In fact, Nadia is intelligent, educated and has had demanding job roles.

Autistic individuals can experience significant difficulties in their wellbeing and in their everyday life. Environments that do not match well with their autistic preferences can pose significant barriers.

Environments, such as being in court, that are unfamiliar, involve significant social communication demands, and require the need to process information quickly and to perform under time pressure can be stressful for autistic individuals. Their autistic needs are likely to be amplified under these circumstances.

Without reasonable adaptations, autistic individuals are at a disadvantage and unable to participate equitably; for instance, they cannot communicate effectively as demanded of or intended for in specific settings (e.g., court proceedings).

This letter outlines how Nadia’s autism affects her communication and processing in the context of legal proceedings and recommends reasonable adjustments to ensure that:

- Nadia is provided with an equitable and fair chance to express and represent herself;
- Nadia can engage meaningfully with and participate effectively in the court proceedings.

3. Other Mental Health Needs

Nadia has significant mental health needs, including a co-occurring diagnosis of Post-Traumatic Stress Disorder (PTSD), linked to a series of adverse life events. Nadia’s diagnosis of PTSD means that she continues to experience longstanding symptoms and difficulties. For further details on Nadia’s mental health needs, please refer to the letter from **Dr Leigh Poyser (Consultant Psychiatrist), dated 26 March 2025**. Nadia has shown a high level of insight into how her PTSD and autism interact. Nadia’s autistic needs are amplified and her ability to communicate effectively is significantly reduced during periods of emotional distress.

4. Summary of Autistic Traits Relevant to Legal Proceedings

The following traits and needs were identified during Nadia’s autism assessment and are particularly relevant to her participation in ongoing legal proceedings:

4.1. Communication Style and Expression

- Nadia has a strong preference for direct, honest communication and finds vague, dishonest, or contradictory language distressing.
- Nadia may use more formal, analytical, or metaphorical language than expected. Nadia may repeat specific phrases or concepts, which might impact how others interpret her intended meaning.
- Nadia may speak at length and with intensity about topics that are important to her. This can make it difficult for others to interrupt or redirect the conversation.
- Nadia uses animated gestures and emotive language, especially when emotionally heightened. While this allows her to express herself authentically, it may be misinterpreted in formal settings.
- Nadia has difficulty intuitively reading non-verbal cues or conversational turn-taking.

4.2. Information Processing and Thinking Style

- Nadia has a highly analytical and detail-focused thinking style, with a strong preference for logic, consistency, and rule-based systems.
- Nadia recognises a “rigid” thinking style. She often creates mental “rules” to help her to process information. This can make it difficult to make sense of unclear, ambiguous, or conflicting information.
- Nadia has a strong sense of justice and fairness, which can lead to emotional distress when she perceives “dishonesty” or “manipulation”.
- Nadia has a strong memory and can recall information in detail but may find it effortful to summarise or prioritise key information.

5. Strengths and Capabilities

While this report focuses Nadia’s autistic needs, it is equally important to highlight her many strengths. Nadia’s autistic traits have no direct bearing on her parental capacities. She is articulate, intelligent, and deeply committed to her children. Her strong memory and analytical skills have supported her success in previous professional roles and in managing complex personal challenges.

6. Recommended Reasonable adjustments

In light of Nadia’s communication, processing, and emotional regulation needs, the following adjustments are recommended to ensure Nadia’s equitable access and participation in ongoing legal proceedings. Consistent adjustments across all stages of legal proceedings are essential to support her engagement.

Communication

- Allow additional time for Nadia to express thoughts, especially on complex or emotional topics.
- Use clear, direct, and unambiguous language.
- Use shorter sentences.
- Avoid vague or contradictory statements (e.g. inference, innuendo).
- Ask specific, rather than open-ended, questions.
- Provide clear prompts and specific cues to gather relevant information.
- Allow time for responses.
- Offer clarification or summarise key points regularly during discussions.

Information Processing and Organisation

- Provide clear explanations of legal processes, expectations, and timelines.
- Allow extra time to process information and formulate responses, especially if the content is new or unexpected.
- Where possible, share documents, questions, or agendas in advance to reduce cognitive load.

Emotional Regulation and Sensory Needs

- Recognise that heightened emotional expression may reflect distress or difficulty communicating, rather than lack of cooperation.
- Offer regular breaks during lengthy or emotionally demanding sessions.
- Be mindful of environmental stressors (e.g. noise, lighting, crowding), and accommodate sensory needs where feasible.

Other Adjustments

- Allow for video link participating, if possible
- Provide a quiet waiting area prior to a trial
- Allow Nadia to appoint an advocate to support her.

Nadia has reported significant distress following the recent withdrawal of previously granted accommodations in court, which has impacted her ability to express herself effectively. We strongly recommend that the above adjustments be implemented consistently throughout the remainder of the proceedings.

Thank you for your attention to this matter. Should you require further information or clarification, please do not hesitate to contact us.

Yours sincerely,

Electronically signed and delivered to avoid delays.

Dr Catherine Cheung
Service Lead & Principal Clinical Psychologist
Central London Adult Autism Service

Sophia Iacovou
Assistant Psychologist

Cc: GP: Stanhope Mews West, stanhope.mews@nhs.net

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION – ADMINISTRATIVE COURT

NADIA ZAHMOUL — CLAIMANT

v.

SECRETARY OF STATE FOR JUSTICE & OTHERS — DEFENDANTS

DETAILED GROUNDS FOR JUDICIAL REVIEW

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION – ADMINISTRATIVE COURT

BETWEEN:

NADIA ZAHMOUL

Claimant

-and-

(1) SECRETARY OF STATE FOR JUSTICE

(2) PERMANENT SECRETARY, MINISTRY OF JUSTICE

(3) CHIEF EXECUTIVE, HMCTS

Defendants

DETAILED GROUNDS FOR JUDICIAL REVIEW (JR1)

A. INTRODUCTION

1. These are the Claimant's Detailed Grounds for Judicial Review.

2. The claim concerns non-judicial, administrative failures by HM Courts & Tribunals Service (“HMCTS”) and the Ministry of Justice (“MoJ”) in relation to:
 - a) the handling, logging, processing, safeguarding, and transmission of serious criminal evidence repeatedly submitted by the Claimant between February 2024 and May 2025; and
 - b) the failure to safeguard, preserve, or review the Imerman devices (a MacBook Pro and an Ubuntu computer) which contained source-level criminal evidence, resulting in loss of chain of custody, risk of destruction, and exposure of the Claimant to serious personal and legal risk.
3. The claim does not seek to challenge any judicial decision on the merits of the family case. It concerns only administrative acts and omissions by HMCTS/MoJ (and associated officials) in relation to criminal evidence and safeguarding.
4. The Claimant is a disabled litigant, with Autism Spectrum Condition and PTSD. Her autism assessment (Central London Adult Autism Service, 1 July 2025) confirms a clinical need for direct, clear, structured, and transparent communication, and records that administrative silence and opaque processes cause severe deterioration and safeguarding risk.
5. The Claimant’s case is that HMCTS and MoJ:
 - a) failed to discharge their basic public law duties to log and process criminal evidence;
 - b) failed to safeguard and preserve the Imerman devices and related material as potential criminal evidence;
 - c) failed to carry out any meaningful safeguarding assessment;
 - d) failed to comply with the Public Sector Equality Duty (“PSED”) under s.149 Equality Act 2010; and
 - e) subsequently misclassified these administrative failures as “judicial”, thereby denying the Claimant any internal remedy and strengthening the need for Judicial Review.
6. The Claimant’s case is supported by:

- a) N461 Claim Form;
 - b) WS1 (full Witness Statement, including the 38-paragraph Statement of Facts);
 - c) Exhibit X – Legal Analysis: Administrative vs Judicial Acts; and
 - d) Exhibit A (A-1 to A-5), including the three Criminal Referrals, Conduct and s.25 extracts, Imerman correspondence, autism report, and selected transmission emails.
7. The criminal material in question has been accepted for review and is currently under active investigation by U.S. IRS:CI. The Defendants' failures therefore carry not only domestic administrative consequences but also potential implications for an ongoing foreign criminal investigation.
8. In light of the history of administrative suppression, the Claimant also seeks an urgent, public oral permission hearing (with a rolled-up hearing if possible) given her disability, safeguarding risks, and the subject matter of the claim.

B. PARTIES AND DECISIONS CHALLENGED

9. The Claimant is Nadia Zahmoul, former wife of the Respondent in underlying family proceedings. She is autistic, has PTSD, and has been recognised as a vulnerable litigant requiring participation measures.
10. The First Defendant is the Secretary of State for Justice, responsible for overall policy and accountability in relation to the justice system.
11. The Second Defendant is the Permanent Secretary, Ministry of Justice, the most senior civil servant at MoJ, responsible for administration, systems, and compliance within the department.
12. The Third Defendant is the Chief Executive of HMCTS, responsible for the operation of the court and tribunal system, including evidence-handling, logging, safeguarding processes, and administrative support for judges.

13. The decisions and/or omissions challenged are:
- a) the failure to log, process, safeguard, transmit, or escalate the Claimant’s criminal evidence submissions between February 2024 and May 2025;
 - b) the failure to safeguard, preserve, or review the Imerman devices (MacBook Pro and Ubuntu) as repositories of criminal evidence;
 - c) the withdrawal in practice of Part 3A participation measures without any hearing, order, reasons, or record; and
 - d) the misclassification of these matters as “judicial” in HMCTS’s letter dated 14 November 2025, thereby wrongly disclaiming administrative responsibility.
14. The Claimant’s case is that these matters are properly justiciable as administrative acts/omissions, not protected judicial decisions, and therefore fall squarely within the jurisdiction of the Administrative Court.
15. The core factual narrative is set out in WS1; these Detailed Grounds cross-refer to that statement where appropriate.

C. FACTUAL BACKGROUND (SUMMARY)

16. In 2021, in the context of the underlying financial remedy proceedings, the Respondent’s MacBook Pro and an Ubuntu computer were placed into Imerman escrow. From the outset, the Claimant warned that these devices contained criminal evidence, not merely confidential financial information.
17. The source material (later dubbed “Pinocchio”) included:
- prostitution ledgers and client invoices;
 - Xero bookkeeping records;
 - BTC wallet addresses and cluster traces;
 - banking arrangements and merchant acquiring structures;
 - the Respondent’s own spreadsheets managing illicit prostitution income.

18. In addition, in May 2021, the Respondent inadvertently transmitted to the Claimant, via Signal, a scanned 200-page hard-copy bundle of material extracted from the devices (Pinocchio), thereby waiving any confidentiality in that set of documents.
19. The Claimant's Conduct Statement and s.25 Statement (served before the final hearing) expressly stated that:
 - a) the Imerman devices contained the key criminal evidence;
 - b) the Respondent's solicitors had attempted to retrieve the Ubuntu device from escrow without review (25 February 2022);
 - c) the devices had never been examined by an expert; and
 - d) there was an ongoing IRS:CI investigation into the Respondent's money-laundering of prostitution proceeds.
20. On 8 February 2024, shortly before the final hearing, the Claimant sent Criminal Referrals (Parts 1–3) and supporting material to the Single Joint Expert (SJE), explicitly setting out the criminal typology: prostitution proceeds, BTC layering, use of Coinbase account, and UK/US nexus.
21. Those Referrals formed the backbone of the later Exhibit A-1 (Criminal Referrals Part 1–3). They systematised the evidence from Pinocchio, Ubuntu, ledger materials, and blockchain data into a structured criminal dossier.
22. On 11 April 2024, the Claimant transmitted the same criminal evidence, including the Criminal Referrals, to the Secretary of State for Justice/MoJ/HMCTS. No acknowledgment, logging, or safeguarding response was received.
23. On 12 May 2025, in the wake of continuing administrative silence, the Claimant transmitted Section C: Criminal Activities / Money Laundering of Prostitution Proceeds to:
 - the Court of Appeal;
 - the House of Lords;
 - the House of Commons (multiple MPs);

- Cabinet members;
 - MoJ and HMCTS.
24. Again, there was no logging, no acknowledgment, no safeguarding action, and no chain-of-custody record.
25. During the final hearing (19–28 February 2024), Part 3A participation measures were granted for the Claimant, recognising her autism, PTSD, and need for adjustments. Those measures were in force during the trial.
26. After the trial, the Claimant discovered that all participation measures had apparently been withdrawn in practice, without:
- any hearing,
 - any court order,
 - any reasoned determination,
 - any record on the CE-file, or
 - any consultation with her or her consultant psychiatrist.
27. The Claimant repeatedly sought clarification from HMCTS and MoJ as to what had happened to:
- a) the criminal evidence; and
 - b) the Imerman devices and associated participation measures.
28. She received no meaningful response on the criminal-evidence side, and instead encountered long delays, deflection, or generic replies on other issues.
29. On 31 October 2025, the Claimant submitted a detailed Stage 3 escalation complaint to HMCTS concerning:
- unlawful withdrawal of Part 3A measures;
 - disability discrimination and Equality Act breaches;

- failure to safeguard criminal evidence; and
- administrative suppression of her criminal disclosures.

30. On 14 November 2025, HMCTS replied in a letter which:

- asserted that issues concerning Part 3A, discrimination, and Equality Act breaches were “judicial”;
- declined to investigate them administratively;
- did not engage with the criminal-evidence handling failures; and
- showed no sign that the underlying evidence had ever been logged, assessed, or escalated.

31. That letter is central to this claim. It demonstrates that HMCTS:

- a) never treated the Claimant’s submissions as administrative matters requiring logging and safeguarding;
- b) did not understand or apply the distinction between judicial acts and administrative support functions; and
- c) effectively denied the Claimant any administrative remedy.

32. On 19 November 2025, the Claimant served a Pre-Action Protocol Letter (PAP) for Judicial Review, focusing narrowly on:

- the suppression/non-handling of criminal evidence; and
- the failure to safeguard Imerman devices as repositories of criminal evidence.

33. The PAP invoked sunlight and preservation mechanisms, including:

- a pre-action candour and preservation notice;
- notice to the Administrative Court Office;
- a safeguarding brief;
- reliance on the IRS:CI external anchor;
- a request for early directions; and

- requests for evidence-preservation directions.
34. The Claimant now issues these Detailed Grounds seeking public law relief.
- ## D. LEGAL FRAMEWORK (ADMINISTRATIVE VS JUDICIAL)
35. The Administrative Court has jurisdiction to review administrative acts and omissions of court administration and government departments. Judicial immunity protects only the exercise of judicial functions (i.e. deciding cases, making orders, managing hearings).
36. The Court also recognises that bodies such as HMCTS and MoJ:
- operate **evidence-handling systems**;
 - maintain **records and logs**;
 - provide **safeguarding and equality-compliance frameworks**; and
 - owe duties of **fairness, rationality, and lawfulness** under public law.
37. Where failures occur in those operational systems (logging, preserving, transmitting evidence; handling correspondence; applying PSED; conducting safeguarding), they are **administrative, not judicial**.
38. In this case, the Claimant does not challenge:
- any judicial decision on the merits of her family case;
 - any judge's finding of fact; or
 - any discretionary decision about directions or case management.
39. Instead, the claim focuses on:
- a) the system-level **failure of HMCTS/MoJ to log and act upon repeated criminal disclosures**; and
 - b) the system-level **failure to safeguard Imerman devices known to contain criminal evidence**.

40. The Defendants' letter of **14 November 2025** wrongly treats these as "judicial" matters. That misclassification is now itself a separate administrative error which **the Court is asked to correct.**

41. The Court's public law tools include:

- declarations of unlawfulness;
- quashing orders (for unlawful administrative decisions/omissions);
- mandatory orders requiring the taking of overdue steps; and
- directions ensuring preservation and disclosure of evidence.

42. The claim also engages:

- the Public Sector Equality Duty (s.149 Equality Act 2010);
- duties of procedural fairness; and
- the duty of candour owed by public bodies in litigation.

E. GROUNDS OF CHALLENGE

GROUND 1 – FAILURE TO SAFEGUARD CRIMINAL EVIDENCE (PUBLIC LAW DUTY)

43. From at least 2021, and certainly by early 2024, the Defendants were explicitly placed on notice that:

- the Imerman devices (MacBook Pro and Ubuntu) and related materials (Pinocchio, BTC ledgers, Xero records) contained evidence of **serious criminal conduct**; and
- that evidence related to **prostitution proceeds, money-laundering through BTC and Coinbase, and illicit cross-border financial flows.**

44. This knowledge derived from:

- the Claimant's **Conduct** and **s.25 Statements**;
- correspondence in 2021–2022 concerning Imerman;

- the Respondent's solicitors' attempt to have the Ubuntu device released from escrow (25 February 2022);
- the Claimant's submission of the Criminal Referrals (Parts 1–3) to the SJE and MoJ/HMCTS; and
- subsequent transmissions to constitutional actors.

45. Once on notice, **the Defendants were under a non-discretionary duty as public bodies to:**

- a) take reasonable steps to **safeguard and preserve the evidence**;
- b) ensure proper **chain of custody**;
- c) prevent unauthorised release or destruction;
- d) consider whether to **refer or liaise with appropriate law-enforcement bodies**; and
- e) **Maintain an adequate record** of what was done with the criminal evidence.

46. These duties arise from:

- basic principles of **public protection** and **prevention of obstruction of justice**;
- the operational duties of HMCTS regarding the **security of documents and digital material**;
- general administrative law requirements to act rationally and reasonably where **serious criminal allegations are made and evidence is provided**.

47. The Defendants did none of the above. Instead:

- there is **no chain-of-custody record**;
- no documented **forensic review**;
- **no safeguarding assessment**;
- no record of **referral to law-enforcement**;
- no explanation of **what happened to the criminal evidence**.

48. The four-year **failure to safeguard the Imerman devices**, coupled with repeated non-handling of criminal submissions from 2024–2025, is **irrational, unreasonable, and contrary to lawful public administration**.

49. This is a purely administrative failure: no judge directed that the devices be ignored or that the evidence be forgotten; **the omission lies entirely in HMCTS/MoJ's operational sphere**.

50. Ground 1 is therefore made out.

GROUND 2 – FAILURE TO LOG, PROCESS, OR TRANSMIT CRIMINAL EVIDENCE (MALADMINISTRATION)

51. Between 8 February 2024 and 12 May 2025, the Claimant submitted criminal evidence on at least three critical occasions:

- a) **8 February 2024** – to the **SJE**, including Criminal Referrals 1–3 and supporting material;
- b) **11 April 2024** – to the **Secretary of State/MoJ/HMCTS**, enclosing the same criminal dossier;
- c) **12 May 2025** – to the **Court of Appeal, Lords, Parliament, Cabinet, MoJ, and HMCTS** (Section C: Criminal Activities / Money Laundering of Prostitution Proceeds).

52. **No logging, acknowledgement, or formal processing occurred.** HMCTS has provided no internal record to show:

- receipt;
- assessment;
- allocation;
- transmission to any judge or safeguarding unit; or
- any decision taken on the material.

53. A court administration system which **allows multiple criminal submissions to vanish** into silence without logging or assessment is **malfunctioning and unlawful**.

54. The Defendants' **failure to log and process the submissions**:

- a) defeats the Claimant's legitimate expectation that criminal evidence submitted to a justice body will be handled properly;
- b) **undermines public protection and the integrity of court processes**;
- c) is **irrational and unreasonable** in public law terms.

55. The problem is compounded by the fact that the material concerned foreign criminal investigations and potential proceeds of crime. Proper logging and onward communication were imperative.
56. Ground 2 is therefore made out.

GROUND 3 – PROCEDURAL UNFAIRNESS CAUSED BY ADMINISTRATIVE FAILURES

57. The combined effect of these failures created a procedurally unfair environment for the Claimant, particularly given her vulnerabilities.
58. The absence of logging, acknowledgment, or any visible handling of her criminal evidence submissions meant:
 - she had no way to know whether her disclosures were being taken seriously;
 - she could not make informed decisions about her safety or legal strategy;
 - she was left in a state of chronic uncertainty and distress.
59. For a disabled litigant with **Autism and PTSD**, administrative silence and opacity are not neutral; they are harmful and disabling.
60. The absence of any administrative mechanism to handle her criminal submissions, or to explain what had happened to them, deprived her of procedural fairness.
61. These failures are distinct from any judicial decision. They concern the basic functioning of administrative systems that underpin access to justice.
62. Ground 3 is therefore made out.

GROUND 4 – BREACH OF THE PUBLIC SECTOR EQUALITY DUTY (PSED)

63. **Section 149 Equality Act 2010** (“Public Sector Equality Duty” or “PSED”)- Legal Framework

Section 149 Equality Act 2010 imposes a continuing, non-delegable, and non-discretionary duty on public authorities, including the Ministry of Justice and HMCTS. The duty requires the Defendants, whenever carrying out any function, to have “due regard” to the need to:

- eliminate discrimination;
- advance equality of opportunity; and
- foster good relations between persons who share a protected characteristic and persons who do not.

64. The Claimant is **autistic and has PTSD**. HMCTS/MoJ were repeatedly informed of:

- her diagnoses;
- her need for structured, transparent communication;
- her vulnerability to administrative silence;
- her need for participation measures under Part 3A.

65. **Operational effect for HMCTS/MoJ.**

The PSED required HMCTS and MoJ to:

- a) Identify that the Claimant is a disabled person (Autism + PTSD).
- b) Assess how their administrative decisions (logging, safeguarding, recording, communication) would affect the Claimant differently from a non-disabled person.
- c) Take positive steps to adjust procedures, mitigate harm, and ensure fair participation.
- d) Keep a written record (though not mandatory, strongly expected for transparency).
- e) Reassess the duty whenever new evidence or new risks emerged.

66. **Breach in this case**

The Defendants:

- a) Conducted no equality assessment,
 - b) Made no disability-sensitive adjustments,
 - c) Allowed Part 3A measures to disappear without process;
 - d) Failed to provide any clear explanation or route for engagement;
 - e) Failed to respond to repeated safeguarding-related correspondence;
 - f) Treated her criminal submissions as if they did not exist.
 - g) Failed to consider the effect of administrative silence on an autistic litigant,
 - h) Failed to mitigate foreseeable deterioration documented in the July 2025 medical report,
 - i) Failed to identify safeguarding risk triggered by their non-responses.
67. This is a straightforward **breach of the PSED**. The Defendants failed to bring their minds to the equality implications of their administrative choices. **Their omissions amount to a complete failure to exercise the PSED, contrary to the Equality Act 2010 and binding authorities (Brown, Bracking).**
68. Ground 4 is thus made out.

GROUND 5 – BREACH OF THE DUTY OF CANDOUR

69. The **duty of candour** requires public authorities in judicial review proceedings to disclose relevant information, records, and reasoning, enabling the Court to understand what was done and why.
70. In this case, the Defendants have:
- **failed to disclose any adequate records** of receipt, logging, or handling of the Claimant's criminal submissions;

- **failed to provide any chain-of-custody** documents for the Imerman devices;
 - **failed to provide any safeguarding assessment** or equality analysis.
71. The absence of such records strongly suggests that no proper process existed and/or that any such process has not been candidly revealed.
72. The **duty of candour** applies at the pre-action stage as well as in the course of proceedings. The Defendants' silence in response to the PAP and earlier complaints is inconsistent with that duty.
73. Ground 5 is therefore made out and also reinforces the seriousness of Grounds 1–4.

GROUND 6 – FAILURE TO SAFEGUARD AND REVIEWIMERMAN DEVICES (CRIMINAL-EVIDENCE CONTEXT)

74. The Imerman doctrine concerns the proper handling of confidential documents between spouses. In this case, however, the devices at issue were not merely repositories of confidential financial information; they were repositories of **criminal evidence**.
75. From 2021 onward, the Claimant repeatedly notified HMCTS, MoJ, and the Respondent's solicitors that the MacBook Pro and Ubuntu device contained forensic criminal evidence, including:
- Prostitution invoices and ledgers;
 - Xero bookkeeping and reconciliation records;
 - BTC money laundering;
 - details of payments and laundering flows.
76. Once that information was on the court record (via Conduct Statement, s.25 Statement, and subsequent criminal submissions), HMCTS and MoJ were under a duty to:
- ensure the devices remained in secure escrow;
 - prevent their unsupervised release;
 - arrange a proper forensic review by an independent expert (or ensure that such review could take place);

- maintain an audit trail of any movement or access.

77. Instead:

- the Respondent's solicitors attempted to retrieve the Ubuntu device in February 2022;
- there was no forensic review;
- the devices remained unexamined for over four years;
- there is no clear record of their current status or whereabouts.

78. HMCTS's letter of 14 November 2025 does not explain what happened to these devices.

The omission is particularly serious given that the Claimant explained that **the evidence was relevant to an active IRS:CI investigation.**

79. The failure to safeguard, preserve, and review the Imerman devices is not a judicial act. It is an **administrative failure** in the operation of court systems and evidence management.

80. Ground 6 is therefore made out.

GROUND 7 – MISCLASSIFICATION OF ADMINISTRATIVE FAILURES AS “JUDICIAL” (HMCTS LETTER 14 NOVEMBER 2025)

81. On 14 November 2025, HMCTS replied to the Claimant's Stage 3 escalation (31 October 2025), asserting that:

- the alleged unlawful withdrawal of Part 3A measures;
- Equality Act breaches; and
- associated safeguarding complaints

were “judicial matters” that HMCTS could not investigate.

82. That assertion is **wrong in fact and in law.**

83. In relation to **Part 3A measures**, there was no hearing, no order, no determination, no reasons, and no record of any judicial decision to withdraw them. The withdrawal occurred “by default” at the administrative level: the measures were simply not continued, recorded or implemented.
84. Treating such an absence of administrative implementation as if it were a protected judicial decision is a misclassification that denies the Claimant any internal remedy and masks administrative failure.
85. Similarly, the Claimant’s Equality Act and safeguarding complaints concerned systemic administrative handling of her case (non-responses, non-logging, failure to make adjustments), not any particular judicial ruling on evidence or costs.
86. HMCTS’s misclassification:
 - demonstrates a **failure to understand the boundary between judicial and administrative domains**;
 - confirms that the Claimant’s evidence and complaints were never properly logged, assessed, or escalated;
 - leaves the Claimant with no alternative but to seek **Judicial Review**.
87. Ground 7 is therefore made out and underpins the justiciability of all other Grounds.

GROUND 8 – NECESSITY FOR URGENT ORAL, PUBLIC PERMISSION HEARING (AUTISM-BASED PROCESS REQUIREMENTS)

88. The Claimant’s Autism assessment (CLAAS, 1 July 2025) confirms that she:
 - requires direct, transparent, structured communication;
 - finds vague or opaque processes extremely distressing;
 - struggles to “read between the lines”;
 - suffers deterioration from administrative silence.

89. The Court of Appeal's paper refusal of 4 August 2025 (in separate proceedings) illustrates the danger of private, non-oral determinations in her case: key issues (Part 3A, disability, criminal evidence) were not engaged with at all, and the order itself indicated that the refusal was final and not renewable to an oral hearing.

90. A repetition of that closed, paper-only process in this JR would be unsafe, discriminatory, and procedurally unfair, given:

- the subject matter (criminal evidence, safeguarding, equality breaches);
- the Claimant's documented vulnerabilities;
- the Defendants' history of administrative suppression and non-engagement.

91. The Claimant therefore seeks an:

- urgent,
- public,
- oral permission hearing,
- with transcription,
- and, if appropriate, a rolled-up hearing (permission plus substantive JR together).

92. This is necessary to:

- allow the Claimant to clarify misunderstandings in real time;
- ensure transparency in how permission is considered;
- protect against further administrative suppression or mischaracterisation.

93. Ground 8 (while framed as a process request rather than a classic quashing ground) is integral to the Court's case-management of this JR and is supported by both disability evidence and the historical record.

F. RELIEF SOUGHT (SUMMARY)

94. The specific relief is set out in the N461 Claim Form. In summary, the Claimant seeks:

(1) Declarations that the Defendants acted unlawfully by:

- failing to safeguard criminal evidence;
- failing to log, process, or transmit criminal submissions;
- failing to safeguard and review the Imerman devices;
- breaching the PSED;
- breaching the duty of candour; and
- misclassifying administrative failures as judicial.

(2) Mandatory Orders requiring the Defendants to:

- disclose all internal communications, logs, chain-of-custody records, and safeguarding assessments relating to the Claimant's criminal submissions and Imerman devices;
- reconstruct, insofar as possible, the evidence-handling trail;
- put in place procedures to safeguard the criminal evidence and cooperate with IRS:CI or other law-enforcement agencies as appropriate;
- take and document appropriate safeguarding and equality-compliance measures in respect of the Claimant.

(3) Quashing Relief in relation to the Defendants' administrative decisions or omissions (including the misclassification in the 14 November 2025 letter) which unlawfully refused to recognise or address these issues.

(4) Such further or other relief as the Court considers just, including directions designed to ensure that the tainted family-court outcome is capable of being revisited by a lawful, evidence-based process in light of the Defendants' unlawful conduct.

(5) Costs of these proceedings.

95. Given the gravity of the issues, the safeguarding risks, and the involvement of foreign criminal investigation (IRS:CI), the Claimant respectfully invites the Court to:

- treat this JR as urgent;

- list an oral permission hearing at the earliest opportunity; and
 - consider a **rolled-up hearing** to determine both permission and substance together.
96. The Claimant reserves the right to supplement these Detailed Grounds in light of any disclosure made by the Defendants pursuant to their duty of candour.

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION – ADMINISTRATIVE COURT

NADIA ZAHMOUL — CLAIMANT

v.

SECRETARY OF STATE FOR JUSTICE & OTHERS — DEFENDANTS

DRAFT ORDER

DRAFT ORDER

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION – ADMINISTRATIVE COURT

Claimant: *Nadia Zahmoul*

Defendants: *Secretary of State for Justice; Permanent Secretary, Ministry of Justice; Chief Executive, HMCTS*

DRAFT ORDER SOUGHT

UPON the Court considering the Claimant's application for permission to apply for judicial review, the N461 Claim Form, the Detailed Grounds, the Witness Statement (WS1), Exhibit X, and Exhibit A;

AND UPON the Court being satisfied that the claim raises (a) issues of urgent public importance, (b) safeguarding risk to a disabled litigant, and (c) matters requiring immediate preservation of potential criminal evidence;

THE CLAIMANT SEEKS THE FOLLOWING ORDERS:

I. URGENT ORAL PERMISSION HEARING (ROLLED-UP IF APPROPRIATE)

1. The application for permission **shall be listed for an urgent oral hearing** (rolled-up if the Court considers it appropriate) **within 7 days** of the date of this Order.
2. **The hearing must be held in public**, subject to any application by either party for limited reporting restrictions.

II. MANDATORY PRESERVATION AND SECURITY OF ALL RELEVANT MATERIAL

3. HMCTS **and** the Ministry of Justice are ordered to **immediately preserve, protect, and secure all material relevant to the Imerman evidence chain**, including but not limited to:
 - a) The original Imerman devices (MacBook Pro, Ubuntu machine, any associated digital media).
 - b) All extracted datasets, forensic images, spreadsheets, ledgers, PDFs, correspondence, or working files derived from those devices.
 - c) All HMCTS/MoJ internal communications referring to the Imerman material from 2021-2025.
 - d) All correspondence with the Single Joint Expert (SJE) and/or any digital forensics personnel.
 - e) All emails, logs, case-management notes, and security-handling records across all HMCTS systems (including CJSMS, Egress, internal SharePoint, case files, and personal inboxes of staff involved).
4. For the avoidance of doubt — **this preservation duty is broad**, and extends to *all* digital and physical evidence **connected with or arising from** the Imerman materials, criminal-evidence submissions, and their handling.

5. No document, email, digital folder, device, or metadata related to these matters may be deleted, edited, removed, altered, or overwritten **pending further order of this Court.**

III. DISCLOSURE, ACCOUNTABILITY, AND RECONSTRUCTION OF THE EVIDENCE-HANDLING TRAIL

6. **Within 14 days**, HMCTS and the MoJ shall:

a) Disclose to the Claimant and the Court:

- i. all internal communications (emails, Teams chats, memos),
- ii. all logging records,
- iii. all chain-of-custody data,
- iv. all safeguarding assessments,
- v. all case-management notes,
- vi. all handling or decision-making records

relating to:

- the Claimant's criminal-evidence submissions (2023-2025), and
- the Imerman devices (2021–2025).

b) Reconstruct the evidence-handling trail *insofar as possible*, including:

- i. identification of every official/staff member who handled, received, viewed, or was notified of the material;
- ii. a chronological timeline of administrative actions taken (or failures to act);
- iii. identification of lost or missing records.

- c) **Provide a written explanation** for any failure to log, process, review, or escalate the Claimant's criminal evidence.

IV. COOPERATION WITH LAW-ENFORCEMENT AGENCIES

7. HMCTS and MoJ shall take all necessary steps to:
 - i. safeguard all criminal-evidence material pending review,
 - ii. preserve forensic integrity, and
 - iii. cooperate fully with **IRS:CI** or other competent law-enforcement authorities in relation to money-laundering, tax, or criminal investigations arising from the Imerman evidence.
8. No material may be withheld from law enforcement without an application to this Court.

V. SAFEGUARDING & EQUALITY ACT COMPLIANCE

9. **Retrospective PSED Analysis.** The Defendants shall conduct a full retrospective PSED analysis of all administrative acts and omissions complained of in this claim, including (but not limited to):
 - a) failures to log and process criminal submissions;
 - b) failures to safeguard the Imerman devices;
 - c) non-responses to the Claimant's disability-related correspondence;
 - d) failures to provide participation-support measures;
 - e) any decision, omission, or handling step that had foreseeable impact on the Claimant as a disabled person.

10. The Defendants shall file and serve the completed PSED analysis within 14 days, identifying:

- a) what equality considerations were (or were not) taken;
- b) what steps were (or were not) taken to mitigate adverse impact;
- c) the reasons for any omission;
- d) and the corrective measures now required.

11. HMCTS and MoJ shall implement immediate safeguarding and equality compliance measures in respect of the Claimant, including:

- a) ensuring all further communication is responsive, accessible, and Autism-compatible;
- b) assigning a named senior liaison officer;
- c) ensuring the Claimant receives all correspondence in written, structured form;

VI. COSTS

10. Costs reserved.

VII. FURTHER DIRECTIONS

11. Liberty to apply.

12. Any further directions to be set at the urgent hearing.

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION – ADMINISTRATIVE COURT

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v.

SECRETARY OF STATE FOR JUSTICE & OTHERS — DEFENDANTS

AUTHORITIES

Authorities Section

The Claimant will rely on the following authorities:

1. **R (Brown) v Secretary of State for Work and Pensions** [2008] EWHC 3158 (Admin)
 - sets out the six “Brown Principles” governing lawful discharge of PSED.
2. **Bracking & Ors v Secretary of State for Work and Pensions** [2013] EWCA Civ 1345
 - reaffirms strictness of the PSED; public bodies must show they directed their mind to equality impacts at the material time.
3. **R (L) v West Midlands Police** [2011] EWHC 1446 (Admin)
 - failure to record or consider equality matters led to unlawfulness.
4. **R (Hurley & Moore) v Secretary of State for Business, Innovation and Skills** [2012] EWHC 201 (Admin)
 - PSED requires “rigorous” and “conscientious” analysis.
5. **Equality Act 2010, s.149**
 - statutory foundation for PSED.
6. **Administrative fairness authorities** (for Grounds 3 & 5):
 - *Osborn v Parole Board* [2013] UKSC 61
 - *Lumba* [2011] UKSC 12
 - *Balajigari* [2019] EWCA Civ 673
7. **Evidence-handling and chain of custody principles**

- *R v Beckford* (for chain-of-custody concept)
- Relevant HMCTS Operations Guidance (disclosure failures).

EXHIBIT A

THE PUBLIC SECTOR EQUALITY DUTY-

BROWN PRINCIPLES & BRACKING SUMMARY

A. The Six Brown Principles (R (Brown) v SSWP [2008])

A decision-maker complies with the PSED only if:

1. **Awareness** — They were aware of the duty.
2. **Due Regard** — They consciously directed their mind to the statutory needs.
3. **Timeliness** — Consideration occurred **before and during** the decision, not afterwards.
4. **Substance, Not Form** — A tick-box or generic statement is insufficient.
5. **Rigour** — Analysis must be “rigorous, open-minded and in substance.”
6. **Evidence** — Records should exist demonstrating active consideration.

B. Bracking v SSWP [2013] — Court of Appeal Reinforcement

Bracking confirms that:

- The PSED is a **continuing duty**, not a one-off assessment.
- The Court must adopt a **strict** approach:

If equality considerations were not demonstrably taken into account **at the time**, the decision is unlawful.

- The duty cannot be delegated.
- Silence, lack of records, or absence of reasoning = **prima facie breach**.
- Disabled persons' needs must be specifically assessed, not assumed.

C. Application to this Claim

HMCTS and MoJ:

- kept **no records of any equality assessment**,
- made **no adjustments**,
- failed to acknowledge disability disclosures,
- failed to mitigate foreseeable harm,
- and treated safeguarding requests as administrative inconvenience.

This satisfies the criteria for total non-compliance with the PSED.