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*EXHIBIT E1*

*Judicial Review:*  
*Zahmoul v Secretary of State for Justice & HMCTS*  
*Administrative Court*  
*Case Ref: AC-2025-LON-004293*

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Nadia Zahmoul

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**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**

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**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**

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**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 Zahmoul**

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**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**

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Nadia Zahmoul

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**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**

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**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.

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**From:** Nadia <[nadia@rosekross.com](mailto:nadia@rosekross.com)>  
**Sent:** Thursday, February 8, 2024 5:14 PM  
**To:** Marlon Pinto <[marlon.pinto@another-day.com](mailto: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**

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**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](mailto: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](mailto:faye.simpson@afpbloom.com)  
**T:** 020 7409 1222  
106-108 Wigmore Street, London, W1U 3LR  
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