
EXHIBIT E3

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

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 Emviryra 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.

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 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

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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.

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

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BV20D01752

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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>
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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

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Nadia

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UK: +44 79 1332 8615

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