

# Judicial Review

## Claim form

For Court use only

01 Dec 2025

Name of court

High Court of Justice  
Administrative Court

Reference number

AC-2025-LON-004293

Date

Day

Month

Year

Help with fees reference number

H

W

F

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A

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B

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](http://www.justice.gov.uk).

Additional information about judicial review proceedings can be found in the Administrative Court Judicial Review Guide. Search for the Guide on [www.gov.uk](http://www.gov.uk).



## 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).

## Section 1 – Details of the claimant and defendant

### 1. Claimant name and address(es)

First name(s)

Nadia

Last name

Zahmoul

#### Address

Building and street

Withheld for safety reasons

Second line of address

Town or city

County (optional)

Postcode

Phone number

079 1332 8615

Email (if you have one)

Nadia@rosekross.com

**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.

**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

Litigant in Person

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)

Litigant in Person

Last name

### Address

Building and street

Second line of address

Town or city

County (optional)

Postcode

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Phone number

Email

**1.3** 1st Defendant's name

Secretary of State for Justice and Permanent Secretary

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

**Address**

Building and street

Ministry of Justice

Second line of address

102 Petty France

Town or city

London

County (optional)

Postcode

S | W | 1 | H | 9 | A | J

Phone number

Email

Reference number (if known)

**1.5** 2nd Defendant's name

HM Courts & Tribunals Service (HMCTS)

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

**Address**

Building and street

HM Courts & Tribunals Service (HMCTS)

Second line of address

102 Petty France

Town or city

London

County (optional)

Postcode

S | W | 1 | H | 9 | A | J

Phone number

Email

Reference number (if applicable)

## Section 2 – Interested parties

### 2.1 Interested party

Name

None presently identified, though the Claimant reserves the right

~~Organisation (if applicable)~~

to add parties following the defendants' disclosure.

#### 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)

**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

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

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

The claim challenges a series of continuing administrative failures, not a single decision. These include:  
1. HMCTS and MoJ’s failure to log, process, escalate, or transmit criminal evidence repeatedly submitted between April 2024 and May 2025, including three detailed Criminal Referrals and associated forensic material.  
2. HMCTS and MoJ’s failure to safeguard and ensure independent forensic review of the Imerman devices (MacBook Pro and Ubuntu computer), despite repeated notifications that these devices contained source-level criminal evidence, resulting in loss of chain of custody and ongoing safeguarding risks.  
3. HMCTS and MoJ’s failure to acknowledge, act upon, or preserve criminal material (continued on separate sheet)

**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

Continuing failures between April 2024 and May 2025 (ongoing administrative omissions)

**Address**

Building and street

Second line of address

Town or city

County (optional)

Postcode



## 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

See continuing sheet Section 4.4

☐ 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

See attached continuation sheet titled ‘Section 5 – Statement of facts relied on

**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

Please see attached continuation sheet titled: Section 6 – Concise Statement of Grounds.”

**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.

☒ 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

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

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

Please see attached continuation sheet 8 titled: 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 Zahmoul*

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

### Date

Day

28

Month

11

Year

2025

Full name

Nadia Zahmoul

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 Bull Street, 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**

**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).

**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.

**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:

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.



**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.

**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.

**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.

**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.

**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 Imerman 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.

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*

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

3

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*

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.**



**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 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).

**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 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**

**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 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

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 6- CONCISE STATEMENT OF GROUNDS*

- potential interference with foreign criminal investigations.

These justify urgent judicial control and immediate listing.

**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;

**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;

**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;

**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,



**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

☐ **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
<input type="text"/>	<input type="text"/>	<input type="text"/>

☐ **Other interlocutory directions** are sought and the application should be considered within  
days 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**.

## **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 Zahmoul*

☐ 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](mailto:immediates@administrativecourtoffice.justice.gov.uk)

### Birmingham

email: [birmingham@administrativecourtoffice.justice.gov.uk](mailto:birmingham@administrativecourtoffice.justice.gov.uk)

### Cardiff

email: [cardiff@administrativecourtoffice.justice.gov.uk](mailto:cardiff@administrativecourtoffice.justice.gov.uk)

### Leeds

email: [leeds@administrativecourtoffice.justice.gov.uk](mailto:leeds@administrativecourtoffice.justice.gov.uk)

### Manchester

email: [manchester@administrativecourtoffice.justice.gov.uk](mailto: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**

**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.”*

**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.**

**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.

**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:



**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.

**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.

**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.

**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).

**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,

**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**.

**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.

**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.



**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.

**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,

**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:

**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:

**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:

**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.

**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.