

---

*EXHIBIT E2*

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

---

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

Dear Alex,

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

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

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

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

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

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

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

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

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

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

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

With my kind wishes,  
Nadia

**Veritas Numquam Perit**

UK: +44 79 1332 8615

US: +1 424 426 9226

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

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

Dear Karen,

I hope you are well.

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

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

With my kind wishes,  
Nadia

\*\*\*\*\*  
\*\*\*\*\*

Your Lordship,

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

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

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

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

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

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

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

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

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

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

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

I entrust our safety into your hands.

Sincerely,

Nadia Zahmoul

**Veritas Numquam Perit**

UK: +44 79 1332 8615

US: +1 424 426 9226

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

Hi Nadia,

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

Thanks,

[REDACTED]  
[REDACTED]  
Special Agent

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

---

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

Dear [REDACTED]

I hope you are well and had great Easter holiday.

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

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

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

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

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

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

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

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

The information uploaded relates to the following matters:

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

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

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

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

With my kind wishes,  
Nadia

**BV20D01752**

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

**Nadia Zahmouli**

---

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

Dear Alex,

Enclosed part the 2<sup>nd</sup> part of the criminal referral.

With kind wishes,  
Nadia

**Veritas Numquam Perit**

UK: +44 79 1332 8615

US: +1 424 426 9226

**Nadia Zahmouli**

---

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

Dear Alex,

Please find enclosed the third part of the criminal referral.

With my kind wishes,  
Nadia

**Veritas Numquam Perit**

UK: +44 79 1332 8615

US: +1 424 426 9226