

Claim No: CL-2023-000262

IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES
COMMERCIAL COURT (KING'S BENCH DIVISION)

B E T W E E N :

YERMEK ALIMOV

Claimant

and

(1) ABDUMALIK MIRAKHMEDOV
(2) RASHIT MAKHAT
(3) ANDREY KIM
(4) GENESIS DIGITAL ASSETS LIMITED

Defendants

WITNESS STATEMENT OF JON ABBAS ZAIDI

I, JON ABBAS ZAIDI, of [REDACTED], WILL SAY:

1. I am an experienced C-Suit operations leader and business strategist for large corporations in the energy and infrastructure sectors.
2. I am a Kazakhstani citizen, currently based in Tashkent, Uzbekistan where I work for a large developer and operations company specialising in renewable energy plants. I also hold a PhD Degree in Management from the University of Ackland, New Zealand.
3. I spent a number of years living and working in the energy sector in Kazakhstan between the years of 1996 to 2019.

4. This statement has been prepared following discussions with the Second Defendant's legal representatives, Mishcon de Reya LLP ("**Mishcon**"), on Microsoft Teams calls and over email.
5. The facts and matters set out in this statement are within my own knowledge, unless the contrary is expressly stated. Where they are within my own knowledge, they are true to the best of my knowledge and belief. Where the facts and matters are not within my own knowledge, I give the source of my information and believe them to be true to the best of my knowledge and belief.

My relationship with Mr Alimov

6. I met Mr Alimov in Kazakhstan, in or around 2007 to 2008. He was working in the energy sector in Karaganda at the time and our paths crossed. I kept in contact with Mr Alimov throughout my time in Kazakhstan and as a result I knew him professionally relatively well.
7. In or around May 2017, I was approached by Mr Alimov to provide due diligence services for certain energy facilities in Kazakhstan. My knowledge of the project for which these energy facilities were being analysed (which I am given to understand to be at the root of this dispute) is limited to the work I did in providing due diligence on them.

Mr Alimov's recent approach to me to provide evidence in support of his claim

8. In or around March 2024, after a considerable period of no contact with Mr Alimov, Mr Alimov approached me via WhatsApp calls to provide evidence of some kind in support of his claim against Mr Mirakhmedov, Mr Makhat and Mr Kim in England.
9. When Mr Alimov began explaining the purpose of me providing evidence, a number of things concerned me about Mr Alimov's explanations (and ultimately led me to deciding not to provide evidence in support of his claim).
10. Firstly, I had an entirely professional relationship and narrow remit with respect to the project to which I am made to understand these proceedings are concerned. I felt that what I was being asked to provide evidence on simply was not within the bounds of my knowledge or understanding.
11. Secondly, Mr Alimov told me that his claim (arbitration of some sort) was being financed by a wealthy third party. I did not understand the significance of this at the



time but instinctively it did not feel right to me that another group of individuals (who I do not know) had a behind the scenes interest in Mr Alimov's claim.

12. Thirdly, Mr Alimov said to me that he would compensate me financially for providing evidence in support of his claim. I understood this to be akin to some kind of a bribe to support Mr Alimov's story. This is something that goes completely against my value system and I was shocked at the fact Mr Alimov knowing me for so long had offered this to me.

13. Rather than explaining the reasons to Mr Alimov why I had chosen not to provide evidence support of his claim, I decided to cut all contact with Mr Alimov. I have not spoken to Mr Alimov since **5 June 2024**.

Allegations that I have been threatened and intimidated not to provide evidence

14. I have since come to understand that Mr Alimov has filed evidence in these proceedings alleging that I was intimidated by or on behalf of Mr Mirakhmedov, Mr Makhat and Mr Kim into not providing evidence in support of Mr Alimov's claim. This is entirely untrue and without any basis whatsoever.

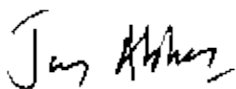
15. I have had a good and friendly relationship with Mr Kim over the years and the suggestion that he (and by extension his partners) would involve themselves in the acts which Mr Alimov alleges is entirely inconceivable.

16. I can categorically say that I have not received any threats or been intimidated by anyone in connection with these proceedings or otherwise. I continue to work freely in the CIS region without any threats at all to my safety.

17. Finally, I confirm unequivocally that I have not been in any way pressured to provide this witness statement.

Statement of Truth

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



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JON ABBAS ZAIDI

Dated 14 August 2024