

IN THE HIGH COURT OF JUSTICE

Claim no. CL-2023-000262

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

COMMERCIAL COURT (KBD)

BETWEEN:

YERMEK ALIMOV

Claimant

- and -

(1) ABDUMALIK MIRAKHMEDOV

(2) RASHIT MAKHAT

(3) ANDREY KIM

(4) GENESIS DIGITAL ASSETS LIMITED

(a company incorporated in Cyprus)

Defendants

WITNESS STATEMENT OF NOYAN ALIMOV

I, NOYAN ALIMOV, of [REDACTED]

SAY as follows:

1. I am the son of Yermek Alimov, the Claimant in these proceedings.
2. My native language is Kazakh and Russian, and I speak fluent English. This statement has been prepared following discussions by telephone with the solicitors instructed for the Claimant.
3. The facts and matters set out in this statement are within my own knowledge unless otherwise stated, and I believe them to be true. Where I refer to information supplied by others, the source of the information is identified; facts and matters derived from other sources are true to the best of my knowledge and belief.

Background

4. The Claimant, Yermek Alimov, is my father. I was present with him at the dinner with Mr Mirakhmedov and his family at 27 Ingram Avenue on 10 June 2017. My statement provides an account of my personal knowledge and timeline of events in relation to the meeting with Mr Mirakhmedov at 27 Ingram Avenue on 10 June 2017.

9 June 2017

5. On 9 June 2024, I travelled from Exeter (where I was studying) to London to meet my family. I remember arriving at approximately 2 p.m. at the Landmark Hotel, where I met my father and Ildar Zakhirov. I greeted each of them, and then my father asked me to allow him to speak with Ildar face-to-face for approximately one hour.
6. I decided to wait in the lobby bar and then met my mother at Harrods at approximately 3 p.m. My mother and I met at Harrods and then went for a walk in the surrounding area for approximately two hours, until 5 p.m. We then stayed at Harrods until 8 p.m., when Ildar and my father came to pick us up in Ildar's car. From there, we went to the restaurant.
7. I remember that there were five of us at the restaraunt: my father, my mother, Ildar Zakhirov, his spouse, and me. We arrived at the restaurant at approximately 9 p.m. The conversation was mainly about routine matters such as universities, schools, family, and life in the UK.
8. However, I remember overhearing my father's conversation with Ildar regarding a power station, as I was sitting next to my father at the restaurant. I also recall that, because it was very loud in the restaurant, my father and Ildar regularly went outside to discuss matters privately.
9. Following our meeting at the restaurant, we went home, and my father told me that he had been discussing the purchase of a power station with Ildar, which could be useful for his potential project.

10 June 2017: dinner at 27 Ingram Avenue

10. On 10 June 2017, my father, my mother (Gulmira Alimova) and I were all supposed to go to a musical. My mother purchased three tickets for her, my father and me in advance. However, on the same day, our plans changed. My father informed me that we were going to meet Mr Mirakhmedov and his family at 27 Ingram Avenue for Iftar dinner and that our plans for the musical were cancelled. My father explained to me that this is an important event as he and Mr Mirakhmedov will become partners and that they have a common project.
11. My father informed my mother and me that he decided to cancel our plans for the musical and go instead to Mr Mirakhmedov's, as it was important to my father due to their common business venture with Mr Mirakhmedov.
12. As a result, my parents and I went to meet Mr Mirakhmedov and his family at 27 Ingram Avenue on 10 June 2017.
13. We went to Mr Mirakhmedov's home by Uber. I do not remember who exactly ordered the Uber.
14. We arrived at Mr Mirakhmedov's residence at 8.40 p.m. Mr Mirakhmedov met and greeted us upon arrival. We entered Mr Mirakhmedov's home, met his wife and son, and noticed there were also two members of staff in the house.
15. Mr Mirakhmedov guided us through his home, and I noted it from outset that this is a house of a very wealthy man. The house had a lot of gold fittings and there were luxury cars outside Mr Mirakhmedov's home.
16. We waited until it was time to start eating and read the Namaz prayer. I recall that at this moment my father and Mr Mirakhmedov were off somewhere together. This happened twice during our visit to Mr Mirakhmedov's home – once before and once after the Iftar dinner.
17. I recall that before the Iftar dinner, my father and Mr Mirakhmedov were off for approximately 30 minutes. Then, my father and Mr Mirakhmedov returned, and we all went to the dinner table.
18. I remember that the dinner table was lavish; however, we did not eat too much. We started with figs and water at approximately 9.20 p.m., then I ate some salads before

we all went to read Namaz prayers up until approximately 9.35 p.m. Following that, we returned to the dinner table to eat the main dishes. I remember that the table was served with rice and lamb. The whole meal lasted for approximately 30 minutes and finished at approximately 10.05 p.m.

19. My father and Mr Mirakhmedov then went off together to discuss their joint business venture, as I understood. I inferred that they went to discuss business because, even during the dinner, whilst we were discussing football, cars and universities, my father and Mr Mirakhmedov briefly mentioned something about the business before they went off together to discuss it.
20. They both returned at approximately 10.40/45 p.m., when we had a quick cup of tea altogether and then left for Tarawih prayers, which started at 11.00 p.m.

Tarawih prayers and a walk to the Landmark hotel

21. I remember that at approximately 10.50 p.m., my father, Mr Mirakhmedov, Mr Mirakhmedov's son and I went to a mosque for Tarawih prayers. We went there by Uber, which took us approximately 10 minutes. Mr Mirakhmedov's son and I were silent in the car as my father and Mr Mirakhmedov talked to each other.
22. I do not remember exactly how long we were in the mosque, but I remember once we left, there were many people and cars. Mr Mirakhmedov suggested accompanying us to our hotel. We tried to order an Uber after leaving the mosque, but it was getting cancelled everytime due to the crowd. We waited for approximately 5 minutes before Mr Mirakhmedov offered to walk with us to our hotel, Landmark Hotel, where we were staying.
23. My father and Mr Mirakhmedov walked ahead, discussing their joint business venture, and Mr Mirakhmedov's son and I followed behind them.
24. I was not able to hear the whole conversation between my father and Mr Mirakhmedov; however, the parts I did hear were about their joint business venture. Mr Mirakhmedov's son and I talked about football, careers, cars and universities.

25. Regarding the conversation between my father and Mr Mirakhmedov, I recall hearing discussions about a cheap source of electricity, bitcoin mining and Ildar's assets. I understood that they were discussing matters related to their joint business venture.
26. When we arrived at our hotel about 25-30 minutes after leaving the mosque, my father and I waited for my mother for approximately 10 minutes, as she was leaving Mr Mirakhmedov's home by Uber.
27. When my mother arrived, my father shared his impressions of our meeting with Mr Mirakhmedov's family. He told us that it was a great day, that he had become a business partner of Mr Mirakhmedov in the bitcoin mining project, and he had been offered a good share in the venture.
28. I remember that my father told us that due to his experience and expertise in the Kazakhstan energy sector, his primary obligation was to find a cheap source of energy. My father also told us that Mr Mirakhmedov was the central figure in this project.
29. The next day, my parents and I were in a very good mood after this news and enjoyed our day in London by visiting different parks, sightseeing spots and restaurants.

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.

Signed: *Noyan Alimov*

Name: Noyan Alimov

Dated: 27 June 2024