Dear Supporters

My last update contained the text of my official open letter to the judge of the Court of Appeal, **Mr Justice Bean**. Today I received an official notification from the court that it refuses without any reasonable explanation to accept this letter I sent through a special form on the court website (case CA-2022-001211-B).

As a continuation of that update, I am posting for everyone to see the text of my application in the framework of this case (CA-2022-001211-B), which was being considered by **Mr Justice Bean**. This application is a complaint against previous decisions of the same **Mr Justice Bean** and I have requested that this complaint be considered by another judge. However, this complaint fell into the hands of the same judge, and he did not transfer it to another judge (although he could do this) and began to consider the complaint against himself.

The essence of the complaint is as follows. In previous decisions, **Mr Justice Bean** prohibited me from representing the plaintiffs at the hearings, citing the fact that I was making allegations of "wrongdoing" by Russian oligarch (defendants) and suggesting that all my statements could theoretically turn out to be unfounded (not a single such statement was considered on the merits by **Mr Justice Bean**, who simply assumed that all of them, without exception, may be unfounded).

In a very laconic decision dated 11 August, **Mr Justice Bean** wrote that the new circumstances described in my complaint about the "wrongdoing" of the Russian oligarchs, shocking any person, are totally without merits. Moreover, **Mr Justice Bean** wrote that if I would repeat my arguments, a civil restraint order will be issued against me.

It hurts the eyes that **Mr Justice Bean** did not, in his super concise decision, even briefly name the circumstances to which I referred and which are allegedly totally without merits.

As anyone can now see, these circumstances were the following:

1. Initiation, after the previous decisions of **Mr Justice Bean**, of a criminal investigation in England in connection with information about ordering my assassination by the Russian oligarchs (Defendants) in connection with these proceedings. The same information contains the second important part - about the total corruption by these oligarchs in the British courts in order to pervert the course of justice. Paragraphs G to T.
2. The initiation, after the previous decisions of **Mr Justice Bean**, of a criminal case in Latvia on the facts of numerous death threats made against me with demands to drop the lawsuit. Paragraphs 43-53.
3. Confirmation by the Latvian police of the facts of attempts to kill me in a publically dangerous way. Paragraphs 54-62.
4. The initiation, after all previous court decisions, of an investigation by the competent authority against my last lawyers, whose strange actions led me to suspect that they had colluded with the oligarchs. Paragraphs 21-42.

5. Public information about the "wrongdoing" of these oligarchs. For example, death threats against another person in connection with another lawsuit. Paragraphs 77-81.

I excluded from the text only a small part that concerns the facts of "wrongdoing" in relation to one more person (paragraph 71). Believe me, these facts are no less shocking and are connected with such an oligarch from **PhosAgro**, about whom the Ukrainian authorities wrote the following to justify the sanctions: "***Vladimir Litvinenko owns about 21% of the Russian chemical company PhosAgro. Since 1994, Litvinenko was the rector of the St. Petersburg Mining University, where he taught Vladimir Putin. The transfer of PhosAgro shares to Litvinenko is considered by many as a bribe to Putin.***"

I believe that the decision of **Mr Justice Bean** of 11 August is knowingly illegal and that it is the result of the activities of Russian oligarchs aimed at perverting the course of justice (see above). I cannot explain otherwise that the initiation of a number of investigations after the previous decisions of **Mr Justice Bean** is, in his opinion, totally without merits in the context that absolutely all my statements about the "wrongdoing" of Putin's oligarchs may theoretically turn out to be unfounded. Initiating investigations, the competent authorities have become convinced that there were more than good reasons for this.

Many thanks for your support!

Igor Sychev

My application in case CA-2022-001211-B

I, Igor Sychev, will say as follows:

This is an updated version of my witness statement, and the need for updates is caused by new extraordinary events that occurred after the filing of the initial version. I will start the updated document with a description of these events, in connection with which very recently (on 9 June 2023), a criminal investigation was launched in the UK. These events are most directly related to the application in question, as they are related to "wrongdoing" on the part of the Defendants, while my previous claims of their "wrongdoing" were in fact the main reason for the Court decisions against which this application was filed. In this particular case, this "wrongdoing" consists in ordering my murder by the Defendants in connection with these proceedings, which was the reason for initiating a criminal investigation in the UK.

In order not to violate the previous paragraph numbering, I will present information about the new events not with the numeric paragraph numbering, but with the alphabetic one. I have compiled the documents to which I will refer in this part of my witness statement in a separate exhibit, which I will refer to in the format IS(A)2(part 1)/[Page(s)].

Update of 28 June 2023

A. In the original version of this document (paragraph 1 below), I indicated that I am a litigant in person due to lack of money, which is the result of the conflict with the Defendants that lasted almost 9 years. Unlike me, the Defendants, being Russian oligarchs, have almost unlimited financial resources and their interests are represented by dozens of highly paid lawyers. That is, in this case, the parties are initially in an unequal position (the Claimants' side is obviously in a weaker position).

B. But this situation is further aggravated by the fact that I am not just a litigant in person, but a vulnerable litigant in person. My vulnerability is based on several grounds at once mentioned in PD 1A.

C. First, PD 1A (4)(f) - (my "relationship with a party <...> (examples <...> intimidation (actual or perceived))"). I have been receiving death threats from the Defendants throughout all 9 years of the conflict and in October 2022 the police of Latvia, where I live as a refugee, opened a criminal case on death threats. More on this will be below - in the main part of this witness statement.

D. Second, PD 1A (4)(e) - ("The impact on them of the subject matter of, or facts relevant to, the case (an example being having witnessed a traumatic event relating to the case)"). Of course, (1) death threats and (2) even more information about the order to kill me, as well as (3) past real attempts to kill me (described below) - are very traumatic (to say at least). But traumatic events are not limited to this. Their number and nature are such that journalists usually call my story shocking, monstrous and the like (I think that I am still alive only because I make the story of my relationship with the Defendants public).

E. Third, PD 1A (4)(c) – "health conditions", because as a result of the monstrous events associated with constant death threats, as well as recent information about the ordering of my murder by the Defendants in connection with these proceedings, I am in an extremely stressful state and for this reason I am on sick leave until 18 July (IS(A)2(part 1)/1-2). I am preparing this document in a really tired and stressed state. Try to imagine yourself in my place, when you are informed on a regular basis that you can be killed at any moment and that round-the-clock surveillance is organized for you.

F. I want to especially note that I was a vulnerable party before either (including when the appealed Court decisions were made), since I received death threats for a long time and I reported this to both Mr Beltrami KC and **Mr Justice Bean**. Being a litigant in person, at that time I did not know that there is such a thing as a vulnerable party and that such situations require a special approach on the part of the Court. In particular, according to PD 1A (6) to (8) it is the Court's responsibility to identify vulnerability as early as possible and take appropriate action. However, despite the fact that I reported death threats, Mr Beltrami KC did not take any action in this regard, and he could, in particular, in connection with this, increase the time of the hearing, so that Mr Beltrami KC himself was able to deal with this issue (death threats) in more detail. But Mr Beltrami KC limited himself to a 1.5-hour hearing, in preparation for which and during which, as he himself confirmed, he did not get acquainted with all the materials, and made a decision in which, in fact, he accused me that I tell the truth about death threats, turning this monstrous situation not in favor of me (the victim and vulnerable party), but in favor of those who threaten (the Defendants). I consider this (IGNORING OF MY OBVIOUS VULNERABILITY) one more and very important reason to overturn the decisions of Mr Beltrami KC and **Mr Justice Bean**.

G. So, a fundamentally important event is that on 9 June, the London Police launched a criminal investigation in connection with the events that began to develop starting on 22 May. I mean the fact that information began to arrive that the Defendants have ordered my murder in connection with these proceedings (that is, in connection with this case CA-2022-001211-B as well) and that this murder will occur in the near future by poisoning or staging an accident. I was also informed that the Defendants had organized 24/7 surveillance of me.

H. The second part of the incoming information is related to the fact that the Defendants are using corruption in the British judicial system to stifle this lawsuit and that this corruption is total in nature. The name of a specific person who directly deals with corruption issues in the interests of the Defendants is mentioned - **Edward Crosse (of Simmons & Simmons)**, solicitor of the First Defendant and former head of the London Solicitors Litigation Association (https://www.lsla.co.uk/).

I. These events began to develop shortly after I officially (informing the Court) made an offer to the Defendants about negotiations about a settlement of the conflict (IS(A)2(part 1)/3-6). The Defendants considered my offer until the very last day and finally rejected it, but shortly after that, the information appeared that the Defendants had ordered my murder.

J. I started informing the Court about these events immediately. I mean the letters dated 22 and 25 May, 1, 2, 12, 14, 15 and 16 June – IS(A)2(part 1)/7-8, 9-11, 12-13, 14, 15-21, 22-30, 31-32 and 33 respectfully.

K. Some of these letters (including the very first, dated 22 May) I also sent to the Defendants, who, to my surprise and contrary to their previous behavior (a formal bare denial of any accusations made just for the record), have not yet commented on the information about their order to kill me and their corrupt activities through **Mr Crosse**. The only exception is a short email from **Mr Crosse** dated 14 June in response to my letter of the same date (IS(A)2(part 1)/22-30), paragraph 15 of which was as follows: "***if the information about the Defendants' corrupt activities through Mr Crosse is true, then these proceedings are corrupt and we are talking about perverting the course of justice, which requires taking appropriate measures***".

L. In his email, **Mr Crosse** did not deny anything, but wrote that he was at the disposal of the Court if the Court had any questions for him. However, to my reply letter dated 15 June (IS(A)2(part 1)/31-32), in which I asked to clarify the procedure in the framework of which **Mr Crosse** intended to answer the possible questions of the Court, **Mr Crosse** did not respond. Thus, given that there is no such procedure and the only way to express the position is to do it in writing, it turns out that for 36 days from the moment when the information about the order for my murder appeared, the Defendants and Mr Crosse did not deny or comment on this monstrous information.

M. I also informed the Latvian police, which in October 2022 opened the criminal case on numerous death threats made against me (more on this will be below), as well as the London police.

N. As a result, while I was in London in connection with these events, I was advised by the police to resubmit my crime report, which I did on 9 June (IS(A)2(part1)/34-61), and a criminal investigation was initiated on the same day with crime reference 23000352662 (IS(A)2(part 1)/62). The police took what was happening very seriously, as it is about extremely serious things and serious crimes. I described the details in the letter to the Court dated 12 June (IS(A)2(part 1)/17-21).

O. On 23 June, in London, a police investigator interrogated me[1] for many hours and confirmed that we were talking about very serious things. The investigator also said that the subject of the investigation would be the previous death threats, many of which came from English phone numbers and emails. Thus, we are talking about very serious crimes directly related to these proceedings, and the investigation is at an early stage and now, as I understand it, the question is being decided whether the police will continue the investigation or whether they will transfer this case to The National Crime Agency, because it is about very serious crimes and organized crime of an international scale. During the interrogation, I expressed the opinion that the most appropriate body is the NCA. The investigator said that based on the results of the interrogation, which was video recorded, a statement (protocol) would be drawn up, which would be sent to me (as of the time of writing this document, this statement has not yet been prepared, so I cannot attach it, but I will do it after receiving this statement).

P. Below I provide a list of received information about the order to kill me by the Defendants in connection with these proceedings and their corrupt activities.

Q. In following paragraphs R to T, I will provide excerpts (IS(A)2(part 1)/64-67) from my testimony as a victim in the Latvian criminal case of death threats to demonstrate why the Latvian authorities agreed to apply the witness and victim protection program to me.

R. I also want to emphasize that the information about ordering my murder fully correspond to what I have previously been told in the direct text by people acting in collusion with PhosAgro shareholders. I mean:

(1) Maxim Lushkin (2018, lines 8-15 of the list of threats (Schedule 2)). He said in plain text

that if I did not drop the lawsuit in England against PhosAgro and its shareholders, the main owners of PhosAgro, A.G. Guryev and I.D. Antoshin, would kill me in Latvia (line 9 of the list of threats). His words were recorded on a dictophone and also confirmed by Valery Stepanov and Maris Celms in their written witness statements, which they gave in the framework of the English trial and which are available in the materials of this criminal case. So, Mr Stepanov (being an experienced lawyer), based on the results of listening to the audio recording, has confirmed that it was precisely about death threats and a demand to drop the lawsuit[2]. Maris Celms was personally present during my telephone conversation with Lushkin and confirmed the content of the conversation[3].

(2) Vladimir Bobylev and others, who in 2021 acted together as one team, posing as "investors", also said in plain text that if I do not assign the lawsuit to them, then **PhosAgro** shareholders would organize my contract murder in Latvia. In the list of threats, these are lines 16-27 (Schedule 2), of which I will especially highlight line 16, which reproduces verbatim (based on the audio recording) Bobylev's words, which he said at our personal meeting on 21.06.21 in Riga, that if I assign the lawsuit to them, it will eliminate the risk of my contract murder by **PhosAgro** shareholders.

S. Against this background, today's information that **PhosAgro** shareholders have actually ordered my murder is completely consistent with previous events. Moreover, I (1) did not drop the lawsuit (as **PhosAgro** shareholders demanded in 2018 through Lushkin, who then officially worked for Antoshin, and lied to me that he was unemployed[4]), and (2) did not assign the lawsuit to Ukrainian-Latvian "investors" (as **PhosAgro** shareholders demanded in 2021). Not only have I not complied with these demands, accompanied by death threats (which is extortion), but I am actively continuing the English proceedings and using all legal mechanisms available to me to achieve justice. Therefore, ordering my assassination looks like a completely logical step on the part of **PhosAgro** shareholders.

T. And the fact that **PhosAgro** shareholders are really capable to make such a radical step (my murder) is convincingly confirmed by the fact that they have already tried to kill me in Russia. And they tried to do it exactly in the form that is mentioned now - by staging an accident.

Update of 16 July to the update of 28 June 2023

U. Firstly, these extraordinary events could not but attract the interest of mass media and on 7 July they were described in the article of The Mirror (IS(A)2(part 1)/68-72). Among other things, the author quoted the words of the London police representative: “***We have had a report of malicious communications. We treat any such allegations seriously***”.

V. Also, this publication describes the previous numerous death threats against me, as well as the real attempts to kill me.

W. Separately, I would like to draw attention to the following fragment of the article: “Around 15 to 20 emails have been sent in total, he added, with the most recent being received on July 2. They make reference to **PhosAgro's** shareholders, including **Guryev** - a "known close associate" of Putin who has an estimated net worth of $9.7billion, and is subject to sanctions in the UK”.

X. **Mr Guryev** (the Fifth Defendant and the main owner of **PhosAgro** - the Fourth Defendant) is mentioned in the emails in the sense that he is the one who has ordered my murder and ordered and organized corruption crimes in England in order to stifle this lawsuit.

Y. 10 days have passed since the publication of the article, but **Mr Guryev** did not comment on the situation in any way, having the opportunity to do so, including to comment publicly, for example, using the right provided by the law to respond to the publication.

Z. However, **PhosAgro** commented on the situation (the comment is given in the text of the article). This comment surprised me extremely and I even sent the letter to the Court about it on 10 July (IS(A)2(part 1)/73-76). What struck me most of all was that **PhosAgro** (1) did not even try to deny that the Defendants had ordered my murder and (2) did not state that they were not involved in sending these emails.

AA. Secondly, in connection with the same extraordinary events, on 3 July, I was summoned as a victim to the Latvian police, which has been investigating the criminal case of death threats made against me since October 2022. I was urged to use the witness and victim protection program as the police assess the risk of my murder as high. I informed the Court of these developments in the letters of 4 and 12 July (IS(A)2(part 1)/77-79 and 80-87). Several days ago I informed the police of my consent.

BB. Thirdly, I would like to draw the attention of the Court to another article in the British press, which was published on 26 February 2023[5] (IS(A)2(part 1)/88-106) and which describes the death threats against me, as well as the real attempts to kill me.

CC. I will quote several fragments:

(1) “In phone calls heard by MailOnline, Sychev was told the lives of his wife and children would be at risk unless he stopped trying to expose the oligarchs”.

(2) “In recorded phone calls translated by MailOnline, a man called Max, who Sychev said was Maxim Lushkin, spoke with the Russian exile.

He said: 'You don't understand that you can be killed today or tomorrow, Igor?!

'Especially since everyone knows that you are in Riga, everyone knows!

'Stop the court claim, you will save your life, do you understand?

<…>

'I beg you. You will lose everything, do you understand?

'You'll lose your kids, you'll lose your wife.'"[6]

DD. In addition, the article explicitly states that this Maxim Lushkin is closely associated with Mr Antoshin (the First Defendant) and that all these threats come from the Defendants.

EE. The article ends with the words "MailOnline has contacted PhosAgro for comment". However, the Defendants did not provide a comment before or after the publication (more than 100 days have passed since then). Also, they did not make any attempts to refute the published information (did not use the right of reply, did not make claims of defamation, etc.), that is, they did not do anything that probably any public company (whose shares are, moreover traded on the London Stock Exchange) and its main owners would do, if this shocking information would not be true.

FF. The silence of the Defendants, if we look at it essentially, is actually very "loud" and very revealing. I cannot imagine that, for example, such large and public companies as British Petroleum, British Airways and the like (comparable to PhosAgro) would remain silent after such shocking publications about their activities, if the published information did not correspond to reality.

Conclusions arising from the publications and reactions to them by the Defendants

GG. Before processing to the conclusions, I must inform you that in addition to the two publications directly mentioned above, several more articles[7] were published this year, as well as my video interview (that is, all these publications came out after the Courts decisions which are being considered in the framework of this case).

HH. All these publications are (among other things) about the attempts to kill me and about death threats in connection with these proceedings.

II. I must also draw the attention of the Court to the fact that all publications were being carefully prepared. As a rule, from the moment when journalists show interest in my story, and before the publication of the article, it takes several weeks (about a month). During this time, the information is carefully checked. In particular, in paragraph CC above, I demonstrated that the journalists themselves listened to the audio recordings (about death threats with demands to drop the lawsuit) and themselves translated them into English.

JJ. **Mr Beltrami KC**, as he himself admits, unlike the journalists, did not have the opportunity and time to consider correctness of my words about the "wrongdoing" of the Defendants, including the most egregious facts of "wrongdoing" - death threats with demands to drop the claim (which is extortion), as well as the real attempts to kill me. Thus, the journalists have done the work that **Mr Beltrami KC** had no time for.

KK. Let me remind you (more on this in the original version of my witness statement, the text of which is below) that **Mr Beltrami KC**, in making his decision due to lack of time, proceeded from the theoretical premise that all my words about all facts of "wrongdoing" by the Defendants may turn out to be unfounded, and it was this premise that became the main argument of **Mr Beltrami KC**. **The journalists have refuted this premise**. The original version of this witness statement (below) contains information that this premise was subsequently refuted also by the competent authorities, including the Latvian police, which, after the decisions of **Mr Beltrami KC** and **Mr Justice Bean**, opened the criminal case on death threats made against me.

LL. The original version of this witness statement (below) also emphasizes that only one story of death threats with demands to drop the lawsuit is enough to dot the i's both on the merits of the dispute and in terms of jurisdiction. No adequate defendant will threaten a plaintiff with murder, demanding that a claim be dropped if the claim is unfounded and/or filed in the wrong jurisdiction.

MM. Generally speaking, in order to fully understand my relationship with the Defendants, it is enough to read the articles published in 2023. Despite the Defendants' attempts to complicate these proceedings, in fact the situation is extremely simple and fully meets the criteria for a summary judgment. And - most importantly - the obviousness of the situation and its shocking nature are now publicly known things and, as far as I understand, no longer require additional proving.

NN. Another important conclusion is related to such a criterion as the unusual nature of the case. The presence of unusual circumstances is significant both in the context of applications under CPR 39.6 (which was being considered by **Mr Beltrami KC**) and in the context of applications under CPR 52.30 (this case).
The story of my relationship with the Defendants has attracted such significant interest from the mass media precisely because of its extreme unusualness or, to be more precise, its shocking and extraordinary nature.

PP. The most revealing in this sense (and the most surprising to me personally) was the fact that the article of The Mirror was even translated into Arabic[8] by someone and reprinted on an information resource specializing in those regions of the world to which this story has nothing to do.

The following is an abbreviated (including in connection with the above) text of the previous version of this document

Introduction

1. I am the Second Claimant in these proceedings and the sole director and the 100% shareholder of the First Claimant, Verlox International Ltd ("Verlox"). I act as a litigant in person for both Claimants (the reason is that as a result of the deceitful actions of the Defendants described in my first witness statement (IS(A)1)[9], I was left without financial resources).

2. The facts and matters set out in this witness 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 that information is identified; facts and matters derived from other sources are true to the best of my knowledge and belief.

3. There is now produced a paginated bundle of true copy documents marked 'IS(A)2' which I shall refer to in this witness statement in the format IS(A)2/[Page(s)].

4. I give this witness statement under CPR 52.30(8) and PD 52A(7.2) in support of the Application for permission to reopen the Application for permission to appeal (IS(A)2/1-12) against the Judgment dated 27 May (IS(A)2/13-20) and Order dated 12 July (IS(A)2/21-22) of **Mr Beltrami KC**, sitting as a Judge of the High Court at the hearing on 27 May 2022.

5. The Application for permission to appeal was refused by the Order of **Rt. Hon. Lord Justice Bean** dated 20 July 2022 (IS(A)2/23). My first Application dated 31 August 2022 for reopening the Application for permission to appeal (IS(A)2/24-27) supported by my first witness statement (attached separately) was refused by the same Justice (**Rt. Hon. Lord Justice Bean**) on 3 October 2022 (IS(A)2/28).

6. This (second) application under CPR 52.30 is being submitted in connection with several events that occurred after all the above-mentioned decisions were made and which indicate (1) the wrongness of these decisions and (2) the extreme unfairness of the current situation.

7. I think it is extremely important to add that the decision of **Mr Beltrami KC** became, indeed, fateful for these proceedings, since all subsequent decisions that actually led to the stifling of the claim refer to the decision of **Mr Beltrami KC** and are based on its conclusions, the most important of which are made on the basis of his theoretical assumptions.

8. **Mr Beltrami KC** was considering my application under CPR 39.6 that I, as the Second Claimant and sole director and owner of the First Claimant, may represent the First Claimant at further court hearings (the Representation Application).

9. The need to submit such an application was caused by the fact that the Claimants, due to a long-term (8 years) conflict with the Defendants, were left without money and since about 2018 we cannot afford to pay for the services of lawyers.

10. And this applies not only to these proceedings, but also to other proceedings related in one way or another to my relationship with the Defendants. In particular, I am an accused in the Russian criminal case 304669, fabricated by the Defendants in 2015-2016, with the help of which the Defendants tried to take me hostage (and were sure that they succeeded)[10] and extorted from me, demanding that the amount of their obligations to me be reduced by 5 times

and that I pay a bribe to the investigators involved by the Defendants in the fantastic sum of $ 4 million.

11. These events are described, for example, in paragraphs 56-67, 79-94, 96-97 of the witness statement of my former Russian lawyer Mr Stepanov (attached separately), of which I will quote paragraph 97: "***From my many years of experience I can declare that I have never met a stranger and more absurd criminal case and have never heard of anything like it. In terms of the number and quality of elementary violations, this criminal case has no analogues. I am convinced that this criminal case is completely fabricated and was initiated not with the aim of investigating something, but with the aim of being used as an instrument of the crime committed against Sychev, that is, to be an instrument of illegal pressure on Sychev in the conflict with PhosAgro***".

12. Despite the fact that the Defendants were sure that they had taken me hostage by confiscating my foreign passport found during the search, I managed to leave Russia. I have been arrested in absentia in Russia, and in 2016 I was put on the international wanted list. However, Interpol, to which I applied on my own initiative, explaining the ridiculous circumstances of my criminal prosecution, terminated my international search in 2017.

<photos>

13. Russia has not challenged this decision of Interpol, having the opportunity to do so.

14. Since 2016, I have been living in Europe (Latvia), the authorities of which granted me refugee status in 2018[11] because of the fabricated criminal case in Russia, as well as because the Defendants in Russia repeatedly tried to kill me, and the Russian investigative authorities, having proved this fact, refuse to investigate it[12].

15. That is, since 2018 I have been under international protection under the 1951 Convention, of which the UK is also a member.

<photos>

16. In 2018, due to the fact that I ran out of money, I was left without lawyers in the Russian criminal case. Russian legislation provides for an unconditional obligation of investigators to provide a free state lawyer to the accused who does not have a lawyer under the agreement. After being left without lawyers, I applied to the investigator for a state lawyer, but despite the unconditional obligation to do so and my dozens of complaints about it, I was never granted a state lawyer and this egregious situation has been going on for the sixth year. Therefore, I am forced to act as a "litigant in person" as an accused in the criminal case either.

17. I am also forced to act as a litigant in person as a victim in a recent criminal case initiated in Latvia about numerous death threats against me and even my children, accompanied by demands from the Defendants to drop this lawsuit or assign it to the parties related with the Defendants. This criminal case will be discussed in more detail below, as its initiation in October 2022 is one of the reasons why I submit this application under CPR 52.30.

18. As for these proceedings, I made colossal and unprecedented attempts to attract third-party funding and thereby automatically solve the problem with paying for lawyers' services. Incomplete list of my **180 (!!!)** attempts is given in the Schedule to my first witness statement and I attach it as Schedule 3 to this witness statement also. However, all these attempts were unsuccessful for reasons unrelated to the strength of the lawsuit (which is confirmed by several law firm and KC at once[13]). The reasons for the refusal of potential investors are related to the fact that the Defendants are Russian individuals and the company which may be resulted in problems with the enforcement of the court decision. This problem became even more significant after the Putin regime started the criminal war in Ukraine and the sanctions imposed on some of the Defendants (sanctions, in particular, were imposed by the UK, US, EU, Canada, Australia, Japan and other countries against the Fifth Defendant - the main owner of PhosAgro, since he is closely associated with Putin and according to investigative journalists[14] and anti-corruption campaigners[15], paid a bribe to Putin in the amount of a 20% stake in **PhosAgro** worth over 1 billion pounds).

19. Refusing the Representation Application, **Mr Beltrami KC**, in particular, referred to the fact that I make allegations against the Defendants, that is, in fact, that I am telling the truth. **Mr Beltrami KC** called my allegations "a very strong contrary factor against the application" (paragraph 33). It is important, that **Mr Beltrami KC** did not, in principle, consider any of my allegations on the merits, and paragraph 33 of the Judgment is worded as follows: "*Given the constraints of the application and the timing of the hearing I have not engaged in -- and I want to be absolutely clear about this -- the details or the merits of any of those allegations. It would be quite wrong for me do so, and I say nothing about them either way because I cannot do so. What I can say, and as is relevant to the application, is that the fact that such widespread allegations have been made is itself, in my judgment, a very strong factor against the application. Such allegations are easy to make but difficult to substantiate. If made and if made on this scale, they tend to take over the litigation, they distract from the true issues, they add immeasurably to the costs and they take a personal toll on the individuals and/or companies necessarily concerned. All of which may of course, but I express no view either way, be entirely unwarranted if they are unfounded. There is therefore, in my judgment, a very good reason to do all that is possible to ensure that such allegations should be made, if at all, only through the filter of a regulated firm with an objective perspective and professional responsibilities, rather than by a company acting in effect as a litigant in person. In summary, I see the fact of the allegations as a very strong contrary factor against the application*".

20. Below I will describe the events that occurred after this Judgment (as well as the decisions of the Court of Appeal), which refute the theoretical assumption made by **Mr Beltrami KC** that all my accusations may theoretically be incorrect. Moreover, this theoretical premise has been refuted by the competent state authorities, who, unlike **Mr Beltrami KC**, had a lot of time to study the essence of the issues under consideration.

First new circumstance

21. First in importance (and last in chronology) is that the British public authority (the Legal Ombudsman), considering my complaint filed back in 2021, on 12 January 2023 (that is, very recently) initiated an investigation against my last solicitors – **the law firm Candey**, recognizing

that the information provided in my complaint is sufficient to initiate such an investigation. I enclose[16] the correspondence with the investigator, including the final list of issues for investigation, consisting of 10 (!!!) positions.

22. The fact is that in July 2021, I managed to find this law firm, which practices extremely exotic and the only possible for me payment terms – DBA without ATE insurance. After checking my case and making sure that it was impossible to lose, **Candey** agreed to represent the Claimants.

23. However, a month later, I was forced to terminate our agreement, because on the eve of our response to the Defendants' applications for challenging the jurisdiction and for security for costs with a total volume of more than 2,600 pages, **Candey's** lawyers began to aggressively and persistently demand that our response be presented only on 3-5 pages, consisting exclusively of headlines and hints, and without supporting evidence at all.

24. Schedule 1 contains a description of my last two conversations with **Candey**, with the hyperlinks to the audio recordings, confirming (1) the aggressively insistent advancement of such a strange demand; (2) **Candey's** refusal to answer my questions about the reasons for such strange tactics; and (3) that the Defendants' representatives, on the eve of signing by me the agreement with **Candey**, explicitly warned me that the Defendants would bribe **Candey**.

25. It was this inadequate behavior by my solicitors that led me to terminate our agreement on 31 August 2021 (the deadline was 1 September) and assume that **Candey** colluded with the Defendants. Since then, I have been forced to act as a litigant in person on behalf of both Claimants and therefore was forced to make the Representation Application under CPR 39.6.

26. I have to immediately note that this approach to litigation was considered very strange by Mr Justice Jacobs at the direction hearing on 8 October 2021, which, among other things, was devoted to the question of the volume of the Claimants' response to the 2600-page applications of the Defendants. Regarding **Candey's** extremely strange demand for 3-5 pages, Mr Justice Jacobs said: "I quite understand that three to five pages is too short. Could you produce a witness statement which was shorter, let's say 75 pages, and still cover the important points?". As a result, Mr Justice Jacobs decided that the response should be 130 pages long (which is 26-44 times more than Candey's anecdotal 3-5 pages) plus an exhibit with confirming evidence.

27. But in addition to the fact that the Judge actually agreed that **Candey's** 3-5-page demand was clearly inadequate, on 8 October 2021, the Defendants as well actually agreed with the same thing (as strange and comical as it may sound in the context under consideration). The fact is that the Defendants' barristers (I need to remind you that there are three active Defendants and all of them are represented by the most expensive lawyers, since, unlike me, they are billionaires) have the opportunity during the hearing to express their opinions on the reasonable length of the Claimants' response to their applications for challenging jurisdiction and security for costs. And none of the Defendants' barristers suggested that such a response should be limited to 3-5 pages. On the contrary, they agreed that the volume of the response should be as suggested and subsequently approved by the Judge. I enclose the transcript of the hearing, the Judgment and the Order (IS(A)2/84-130) so that you can recheck the correctness of stated above.

28. Thus, on 8 October 2021 I found support not only from the Judge, but also from the barristers of the three Defendants, who acted on the instructions of highly paid Defendants' solicitors. In my opinion, this argument is the most eloquent.

29. **And exactly for this reason, I sent the complaint against Candey a day after this hearing, namely on 10 October 2021, to the Legal Ombudsman, who, after 15 months, finally initiated the investigation into this story.**

30. Even the fact that **Candey's** clearly inappropriate behavior was found by the Legal Ombudsman to be worthy of investigation is enough to review the decisions of **Mr Beltrami KC** and **Mr Justice Bean**. **I hope, anyone will agree that it is clearly unfair (to put it mildly) to actually stop the plaintiff's access to justice (by prohibiting him from continuing the proceedings without lawyers) against the background of the fact that the plaintiff was left without lawyers in an extremely difficult situation due to at least clearly inadequate (unprofessional) behavior of those lawyers.**

31. And if we assume that the reason for the obviously inadequate behavior of the lawyers was their collusion with the Defendants (that is, a corruption crime, the victims of which were the Claimants), then the injustice and even the strangeness of such a decision of the Judge is squared or even cubed.

32. The previous version of paragraphs 32-35 about my crime report to the London Police is no longer relevant in connection with the events described in paragraphs A to T above. In order not to break the numbering of paragraphs, I will leave paragraphs 33-35 blanks.

33. See paragraph 32.

34. See paragraph 32.

35. See paragraph 32.

36. I would like to draw attention to the fact that the crime reports are also about other crimes (for example, extortion and use of a forged document by the Defendants in these proceedings).

37. By the way, regarding the use of the forged document by the Defendants, **Candey** confirmed this fact and even agreed that information about this should be included (albeit in the form of hints and headings and without confirming evidence) in a 3-5 page document on the part of the Claimants. I will quote verbatim the first part of my conversation with **Candey** on 27 August 2021 (line 1 of paragraph 3 of Schedule 1): "*Mr Botiuk (**Candey**): 100% we need to put all of these in the context of the answer, as Ben [Mr Wells from **Candey**] correctly said, we need to put in the highlighted points from your evidence which would be 3 to 5 pages of the highlighted points that there were threats to your life, that there were forged documents, those issues that the personal representations (?) [Adam Arif from **Candey** has translated this into Russian as «личные угрозы» or personal threats] made to you by the beneficial owners. All of those facts will be set out in summary form but in no more than 3 to 5 pages*".

38. I also consider it necessary to draw the Court's attention to the following. After initiating the investigation by the Legal Ombudsman, **Candey** provided deliberately false information to this body, and this falsity is very easily verified and refuted. In this regard, I also had to send a complaint to the Solicitor Regulation Authority (IS(A)2/131-150), since the SRA's rules prohibit law firms from providing false information not only to the Courts, but in general in principle.

39. So that you have an idea of the primitive nature of lies on the part of **Candey**, I will quote one fragment of my complaint to the SRA:

(1) The first OBVIOUSLY FALSE statement is formulated as follows: "*We previously represented Mr Sychev in High Court proceedings (claim reference No. CL-2016-000831) until our firm decided to come off the record after being falsely accused by Mr Sychev of taking bribes from his opponents in the litigation*".

(2) Obviously false (and radically distorting the reality) words are underlined by me - that allegedly **Candey** was the initiator of the termination of the relationship and ceasing to act.

(3) This lie is, I would say, brazen and very primitive, as it is easily refuted by the irrefutable evidence available to **Candey**. It was I who initiated the termination of the contract, which is confirmed by my letter to **Candey** dated 31 August 2021, paragraphs 38-39 of which read as follows: "*I have no other reasonable explanation for the above, except that you appear to have colluded with the defendants (bribed by them). This circumstance does not surprise me at all, given that (1) the defendants made direct threats and warnings to me that they might bribe my lawyers, and (2) the very likely fact that my former solicitors have been bribed as well (paragraphs 221, 245-259 of my WS sent to you on August 20). In such circumstances, I am forced to terminate the contract between us and reserve the right to take the necessary legal steps in connection with your actions, which, at a minimum, are incompatible with the ethical rules of solicitors*".

(4) The next day, without waiting for a response from **Candey**, it was I who filed the Notice of change of legal representation (N434).

40. The SRA, in the email dated 19 April 2023 (IS(A)2/151-153), informed me of the initiation of their investigation and made the following comment: "*you have raised serious issues of misconduct*". Thus, Candey is now under investigation by two bodies at once: the Legal Ombudsman and SRA.

41. The important comment on my petition mentioned above (in paragraphs 32-35, the updated version of which is in paragraphs A to T above): its main topic is death threats from the Defendants and my desire to protect myself with the help of publicity from bringing threats to life (regarding death threats and real reasons to be feared of these threats, it will be below - in the section about the second new circumstance). Please also see paragraphs A to T above.

42. **Finalizing this part, I would like to emphasize that in paragraph 32, which precedes paragraph 33 of the Judgment quoted in paragraph 19 above, Mr Beltrami KC cited my**

allegations against Candey as the reason for his decision ("*allegations <...> against in some cases the claimants' own solicitors*").

Second new circumstance

43. The second important event occurred on 3 October 2022, i.e. the day **Mr Justice Bean** made a decision on my first application under CPR 52.30. I was informed of this event only on the next day, 4 October. I mean the fact that the police of Latvia, opened a criminal case on the facts of numerous death threats made against me and even my children (IS(A)2/154-174).

44. The initiation of this criminal case confirms two extremely important circumstances at once: (1) the presence of death threats (this issue will be discussed in paragraphs 45-53 below), as well as (2) the fact that the Latvian police agreed that they had tried to kill me in Russia, and - most shockingly - in a publically dangerous way (this issue will be discussed in paragraphs 54-62 below).

Confirmation of multiple facts of death threats

45. The incomplete list of the death threats under investigation contains more than 100 (!!!) positions (Schedule 2) and includes two types of threats:

(a) Anonymous (emails from fake addresses about my funeral, anonymous messages in instant messengers, calls from "one-time" phone numbers, etc.) – lines 28-36 and 38-86 of the list of threats under investigation.

(b) Non-anonymous death threats (i.e. threats made by specific persons whose identities are known) – lines 1-27 and 37. All non-anonymous death threats were accompanied by property demands to me:

(i) related to these proceedings (to drop this lawsuit[17] or assign the Claimants' rights to those who threatened[18]), or

(ii) in the case of death threats that were made prior starting of these proceedings, the demands were either to a five-fold reduction in the amount of the Defendants' obligations to me, or to a complete dropping of my financial claims at all[19]. One of two claims, combined in these proceedings, is precisely these obligations (the so-called Share Agreement).

46. An important point that I would like to draw your attention to in the context of this event is that the Latvian criminal case was initiated based on my application, which was initially addressed to the UK police (IS(A)2/175-176). I applied to the UK police since the death threats were related to these UK proceedings. However, the London Police referred me to the Latvian

Police in accordance with a certain procedure governing the investigation of cross-border crimes.

47. Separately (as I consider it important in the context under consideration) I would like to draw attention to the fact that I have referred to the death threats and extortion under these threats in my written[20] and oral[21] submissions for both **Mr Beltrami KC** and **Mr Justice Bean**[22]. At the same time, I gave exactly the same evidence and arguments that became the reasons for initiating a criminal case on the facts of numerous death threats. However, my evidence and arguments were not considered in any court decision, and even more so, the reasons why they were rejected were not indicated.

48. It is also important to note that the Latvian police, the body competent to analyze these issues on their merit, unlike **Mr Beltrami KC**, had more than enough time to do so. The initiation of a criminal case was preceded by a six-month pre-investigation check. After such a long and careful study, the police have confirmed that numerous death threats had been made against me and opened the criminal case.

49. Thus, this fact alone refutes the Judge's main and quite extreme premise that all my accusations may be theoretically wrong. I call it extreme (and extremely profitable for the Defendants), because there are two other theoretical possibilities: (1) that all my accusations may be true, or (2) that at least some of them may be true.

50. At the same time, the example of criminality, existence of which has been admitted by the Latvian police, is one of the most shocking and at the same time dotting the i’s in the situation as a whole.

51. The shocking nature of the threats is confirmed both by their content (some of them are addressed even to my children) and by the number (more than 100).

52. The flow of threats does not stop and, moreover, has intensified right now, when the Court of Appeal is considering this case and two others related to it. I hardly have time to send information to the police about new and new threats. Only in April-May of this year (that is, during less than two last months) I received at least 30 threats recognized as such by the Latvian police. Please also see paragraphs A to T above.

52.1. I was also forced on 12[23], 25[24], 28[25] April, 11 and 19 May[26] to inform the Court and the Defendants' solicitors about the flow of threats, but even after that, the threats did not stop. I will quote paragraphs 7 and 8 of the letter of 25 April: “***I am sure that neither the police of Latvia, nor the English courts (even more so, within the framework of civil proceedings) have ever encountered something like this, when the scale of the threats is simply amazing and cannot help but shock. It will probably be more correct to say that within the framework of civil proceedings, the courts have probably never encountered cases where the defendant threatens the plaintiff with murder, in principle***”.

53. The conclusion from the story of the death threats is as follows - the story of threats dots i’s in the dispute considered in these proceedings, since these threats, especially

accompanied by demands to drop the lawsuit or assign it to the threatening ones, are very eloquent evidence of the existence of the obligations of the Defendants, as well as English jurisdiction. I cannot even come up with a more eloquent proof. No adequate defendant will threaten the plaintiff with murder and demand that the lawsuit be dropped if the lawsuit is wrong in the merits and/or filed in the wrong jurisdiction.

Confirmation by the Latvian police of the facts of attempts to kill me in Russia

54. In these proceedings, I have repeatedly referred to the fact that (1) attempts to kill me were made in Russia (committed in a generally dangerous way); (2) Russian law enforcement agencies, having proved the fact of the attempts, refuse to investigate them; and (3) the Defendants (in particular, the First One), denying his involvement in the attempts, nevertheless, for reasons unexplained from the point of view of common sense, demanded from me orally[27] and even in writing[28] (through **PhosAgro's** lawyer Mr Lashevich), so that I withdraw the crime report about the attempts to kill.

55. If we talk about the witness statement of Mr Stepanov (who at that time was my lawyer and provided legal assistance, including in connection with the attempts to kill me), paragraphs 7-9, 14-19, 70-74 are devoted to these attempts and the illegal refusal of Russian law enforcement agencies to investigate the attempts.

56. The initiation of the criminal case in Latvia on death threats confirms not only the existence of these threats, but also the facts of attempts to kill. The fact is that Section 132 of the Criminal Law of Latvia is formulated as follows[29] (underlined by me):

"Section 132. Threatening to Commit Murder and to Inflict Serious Bodily Injury

For a person who commits threatening to commit murder or to inflict serious bodily injury, if there have been reasonable grounds to fear that these threats may be carried out"

57. As I wrote above, the initiation of the criminal case was preceded by a very long pre-investigation check. The long term is explained not by the fact that the police had difficulties with the facts of death threats (they are obvious to any average person), but by the fact that during this long period, it was being found out whether there were "reasonable grounds to fear that these threats may be carried out". It is this aspect that is much more complex and time-consuming.

58. As a result, the criminal case was initiated only after the police, as well as the prosecutor's office, agreed that this condition was met in this case, precisely for the reason that attempts to kill me had already been made in Russia. At the same time, I provided the police with the same set of documents (mainly expert opinions) that I submitted in the framework of these proceedings (IS(A)2/187-310). This set consists of 9 documents, each of which individually (and even more so altogether) confirms that the causes of the incidents, disguised as accidents, were the actions of criminals.

59. In particular, this set includes five expert opinions (documents 1-5), one of which (No. 5) was prepared on the instructions of the investigative authorities. Four other documents (6 to 9) are letters from the car dealer and car manufacturer, as well as an explanatory letter from the expert institution that prepared the conclusion on the instructions of the investigative authorities. Letter No. 9 from the car manufacturer Nissan is also a response to the request of the investigative authorities.

60. Document 4 confirms that those who ordered and executed these crimes were well aware that not only I could suffer from these crimes, but an unlimited number of people, including completely random ones. Most of all, I was struck exactly by this fact - that the experts confirmed that the criminals were aware that the wheels could fly off (and the brakes could fail) at any time and that as a result, not only I could be injured, but also people who happened to be nearby. I might have run into a crowd of people at a pedestrian crossing, for example, or hit a school bus.

61. In Russia, such crimes are punishable by up to life imprisonment and even the death penalty (Article 105(2)(e) of the Criminal Code). Since the crimes were not successful (no one has been killed) due to circumstances beyond the control of the criminals, the liability is provided for up to 15 years of imprisonment (Article 66(3) of the Criminal Code).

62. I would also like to draw the Court's attention to the following circumstance. The story of death threats and attempted murders has recently attracted the attention of the English, American and Latvian press. In particular, publications devoted to this were published in January in the USA[30] (IS(A)2/311-316) and February in the UK (two articles[31] [32] - IS(A)2/317-330 and 331-349). But the most important thing is not even in this, but in the fact that there were no attempts on the part of the Defendants to refute the information that became public or at least to comment (at least, in the form of bare denial). I will also note that information about this was published in the Russian and European press much earlier (in 2016-2018) and the Defendants also did not take any measures or make any comments regarding these publications.

Third new circumstance

63. The third most important event that occurred after the decisions on the Representation Application and confirmed their wrongness occurred on 10 October 2022. I mean, that on this day, Professor of Law, Doctor of Law, founder of the Free University, one of the most famous Russian lawyers and human rights activists, Russian politician and public figure, member of the Anti-War Committee of Russia, Elena Lukyanova, at my request, prepared on pro bono terms a legal opinion[33] confirming some of my allegations against the Defendants' experts.

64. I was not able to provide this opinion earlier because, unlike the Defendants, who have actually unlimited financial resources and provided the opinions of five experts at once, I am unable to pay for the services of experts.

65. It is important to note that I was not personally acquainted with Professor Lukyanova, and it took me more than one month to find her contacts (she, like me, now lives in Latvia), to get acquainted, to explain the details of the case, taking into account her super-busy schedule.

66. At the same time, I understood that, given that two of the Defendants' experts are professors, the status of an expert on my part should be at least not lower than their status. In this sense, Professor Lukyanova surpasses all the experts of the Defendants both in her fame not only in Russia, but also in the world, and in her work experience, which is impressive (for example, she worked for many years in the State Duma of the Russian Federation as an expert).

Other important and relevant circumstances

67. Since after filing my witness statement in the original version (19 March) there was quite a lot of correspondence, for convenience I included some of the most important letters in the Exhibit, and below I will quote the most relevant and important fragments.

68. In addition, I will give relevant information that I have only recently become aware of.

The first circumstance

69. First, I would like to draw attention to my letter of 21 April (IS(A)2/365-372), from which I will quote paragraphs 31-33:

(31) The Defendants' arguments in their letters about the refusal to negotiate dated 13 and 19 April boil down to denigrating me, and the most important basis for this is the decision of **Mr Beltrami KC**, which became fateful (crucial) for these proceedings, and my application under CPR 52.30 against which the Court of Appeal is currently considering in the framework of case CA-2022-001211-B.

(32) In this regard, I will simply remind you that **Mr Beltrami KC** effectively closed the Claimants' access to justice on the premise that all the horror described above may theoretically turn out to be unconfirmed. In fact, **Mr Beltrami KC** accused me of reporting this shocking behavior of the Defendants, and decided that I can only report it through the filter of lawyers (knowing that I simply do not have money to pay for lawyers' services, as well as other circumstances that make it impossible to involve lawyers).

(33) At the same time, as can be seen from the above, my accusations against the Defendants about their shocking behavior are supported by (1) evidence in the form of the audio recordings, (2) the emails from my former lawyer, Mr Dergachev, (3) the witness statement of my other lawyer, Mr Stepanov. In addition, by (4) the Latvian authorities, who granted me refugee status on the basis of these very events, and (5) Interpol, which for the same reasons stopped my international search, agreeing that the criminal case against me was fabricated and

pursues other goals (not related to justice). In other words, my statements about the shocking behavior of the Defendants passed a multi-step filter not only in the form of lawyers, but also in the form of government agencies.

The second circumstance

70. Second, I would like to draw attention to my letter of 28 April (IS(A)2/373-377), from which I will quote paragraphs 21-22:

(21) Separately (especially for case CA-2022-001211-B, which is the base case for the other two cases) I would like to add the following. **Mr Beltrami KC** wrote in his decision that I can only report wrongdoing and criminality on the part of Defendants through the filter of lawyers (for whose services I do not have money). But before **Mr Beltrami KC** <…> there was the witness statement of my former Russian lawyer, Mr Stepanov, whose legal experience is approximately 50 years. And this witness statement contains information about (1) attempts to kill me; (2) death threats against me, accompanied by demands to drop the lawsuit (extortion); (3) the Defendants' fabrication of a criminal case against me in Russia, and so on.

(22) It is completely incomprehensible to me (1) why this witness statement cannot be considered as the "filter" mentioned by Mr Beltrami KC, and (2) why Mr Beltrami KC <…> did not mention Mr Stepanov's witness statement at all, which I referred to.

The third circumstance

71. <excluded>

72. Why do I want to highlight this story especially? Perhaps the story of my relationship with the Defendants (which journalists and others describe only as shocking) seemed implausible to **Mr Beltrami KC** because of the scale and nature of "wrongdoing" (to put it mildly) on the part of the Defendants, and therefore he decided that I have the right to talk about this “wrongdoing” only through a filter in the form of lawyers.

73. But Olga Litvinenko's story, connected with the same people has been public for many years - at least since 2014, when I first saw the detailed article published in Russia[34] (at that time there were still small remnants of freedom of the press in Russia), which described the shocking details of the story of both Olga Litvinenko herself (who is considered by Russian authorities to have been abducted) and her associates and friends, who were all jailed without exception in the framework of criminal cases fabricated by order of PhosAgro shareholders.

74. If we talk about recent publications, it is enough to mention an article in The Times, one title of which is already shocking – "They kidnapped my daughter"[35] (IS(A)2/388-399).

75. Olga Litvinenko has repeatedly called for **PhosAgro** shareholders (including the First and Fifth Defendants) to be included in the Magnitsky sanctions list for their involvement in egregious human rights violations, both publicly in the press and in official meetings with authorities in various countries. I will quote some excerpts from her interviews of 2018-2019:

(1) "I***f Vladimir Litvinenko and his partners in PhosAgro, whose shares are freely listed on the London Stock Exchange, are included in the Magnitsky list, the possibility of their influence on the legal and public systems of those EU countries that adopt the relevant acts will be partially prevented. We are talking about Vladimir Litvinenko, Andrey Guryev [the Fifth Defendant] and Igor Antoshin [the First Defendant], who can be described as Putin's "wallets" and pillars of today's Kremlin regime. And this is not some emotion, but a legal opinion prepared by an international group of lawyers***" (the article of 12 October 2019[36] - IS(A)2/400-407).

(2) "***Vladimir Litvinenko is a dollar billionaire who owns shares in PhosAgro, and Olga Litvinenko is seeking the inclusion of her father and his business partners Andrey Guryev and Igor Antoshin in the sanctions lists. This is one of the issues raised at the meeting between Olga Litvinenko and Estonian parliamentarians. "I discussed the inclusion in the sanctions lists of co-owners of PhosAgro, whom I call "Putin's shadow cashiers". I have already spoken about this in the Lithuanian Parliament and am now preparing a legal opinion for the working group on including the above-mentioned individuals in the sanctions list. Guryev is already on the so-called "Kremlin list"*** (the article of 7 March 2018[37] - IS(A)2/408-412).

76. I think that the Court of Appeal will agree that public and official calls to include in the "Magnitsky list" are made in relation to a very small number of people, but it happened exactly in relation to **PhosAgro's** shareholders and, in particular, the First and Fifth Defendants. Against this background, my words about “wrongdoing” (attempts to kill, death threats, fabrication of the criminal case, and so on) no longer look so shockingly implausible.

The fourth circumstance

77. Moreover, I found another story in open sources when **PhosAgro** (the Fourth Defendant) threatened to kill one more person (Ben Worsley) involved in the trial (IS(A)2/413-415): https://benworsley.substack.com/p/phosagro-guryev-death-threats-and. In particular, he has written:

“FACT: During the ensuing tussle, the White Shoe lawyer told me that I might be “physically intimidated” by Phosagro, who had their eyes on the assets over which I had signature.

FACT: After the news from the lawyer that I might get it in the head from Phosagro and its owners Guryev and Vladimir Litvinenko, Otkritie Bank paid for security at the house I used to own in Europe.

FACT: I lived in fear of my life. Maybe it was all a set up and I was never at risk. Or maybe I was at risk and that's why Otkritie Bank paid for the security doors and escape ladders that I had installed in my home".

78. I checked with other sources and made sure that Ben Worsley was indeed involved in the English litigation, connected with **PhosAgro**.

79. I also informed the Latvian police about this story on 11 November 2022.

80. Thus, it can already be said that the tendency of the Defendants to various kinds of "wrongdoing" is already a well-known fact. Against this background, forbidding me to tell the truth about the "wrongdoing" committed by the Defendants against me, without a filter in the form of lawyers (as Mr Beltrami KC did) is an extremely excessive and monstrously unfair measure. Especially when the facts of "wrongdoing" committed against me are confirmed by numerous proofs.

81. Finally, I will quote the last paragraph (31) of my letter of 21 April: "*As a final remark, I want to comment on the words from the Defendants' letters that I am allegedly scandalizing the situation. In fact, I am just reporting the reality (which is supported by evidence), and the blame for the fact that this reality is not only scandalous, but literally shocking, lies solely with the Defendants themselves*".

Conclusions

82. **I am sure that these newly emerged circumstances are already sufficient grounds for reviewing the fateful decisions of Mr Beltrami KC and Mr Justice Bean, as well as all subsequent decisions that were made with references to them.** Or at least the issue of review should be made dependent on the results of the investigations of the criminal cases initiated by the London Police (on 9 June) and Latvian Police (on 3 October 2022) and the British investigation into Candey story (at the same time, I believe that waiting for the results of the investigations is clearly unnecessary, since the very fact of initiating these investigations fully exonerates me of those accusations made against me by **Mr Beltrami KC** and **Mr Justice Bean** without their verification on the merits).

83. I have demonstrated above and in my first witness statement that the new circumstances confirm, that the Judgment of **Mr Beltrami KC** and Orders of **Mr Justice Bean** are wrong and all the conditions provided by CPR 52.30(1) for reopening the Application for permission to appeal are met (my first witness statement under CPR 52.30).

84. Moreover, I am sure that if the circumstances described above had happened before the decision by Mr Beltrami KC, then his decision would have been different (exactly the opposite). I cannot imagine how it would be possible to refuse the Representation Application against the background of the fact that an investigation has been initiated against the last solicitors of the Claimants on my application, in which I directly accuse

them of collusion with the Defendants. After all, this story has been exactly the reason why I was forced to submit the Representation Application.

85. It is also difficult for me to imagine the refusal to grant this application against the background of stated in paragraphs A to T above and the criminal case on multiple death threats, which were accompanied by demands for me to drop this lawsuit or assign the Claimants' rights to persons associated with the Defendants.

86. It is not unknown that I declare the bias of **Mr Beltrami KC** (section E of my first witness statement), but I think that under the conditions described, even his bias would hardly outweigh the monstrously shocking things in question (death threats and collusion of the Defendants with the Claimants' solicitors).

87. Separately and especially, I want to emphasize that at the time of consideration of the Representation Application by **Mr Beltrami KC**, my applications to the London Police and the Legal Ombudsman, on the basis of which decisions were made to initiate relevant investigations, had already been submitted. Moreover, they were filed long before that, namely in October 2021 (the hearing on the Representation Application took place on 27 May 2022, that is, 7-8 months after my applications were submitted).

88. Also, separately and especially, I want to emphasize that the fact that it took such a long time for the competent authorities to initiate investigations has nothing to do with me. If we talk about the police, I, for my part, took all necessary actions to speed up the process, but it took several months only to consider the question of the correct jurisdiction for initiating a criminal case. As for the Legal Ombudsman, such a long period is due to the specifics of this body, which once every three months, with apologies, notified me that the time for considering my complaint has not yet come.

89. As regards the third circumstance (the expert opinion of Professor Lukyanova), then in addition to what I wrote about this above, I want to add the following. Before signing the contract with my last solicitors and in the first days after it, the solicitors themselves notified me that, given that the Defendants had submitted five expert opinions, it was necessary for us to submit expert opinions in response. The solicitors stated that they would organize work with experts and pay for their services. But soon (I need to remind you that our contract lasted only one month) the position of my solicitors changed dramatically and they began to demand that our entire response to the Defendants' applications, supported by five expert opinions, would be set out on 3-5 pages consisting of headings and hints, and would not contain any evidence at all. That is, if it were not for the collusion of the Defendants with Candey, then the expert opinions from the Claimants would have been presented much earlier and in a significantly larger number.

90. As for the condition referred to in CPR 52.30(1)(c) ("there is no alternative effective remedy"), in addition to what is stated in my first witness statement under CPR 52.30 dated 31 August 2022 on this issue, I want to add the following. The further development of events clearly and additionally proved this, since all further Court decisions that I challenge in the framework of cases CA-2022-002495 and CA-2023-000481 are based precisely on the decision of Mr Beltrami KC.

91. Therefore, I kindly request that (1) permission to reopen the application for permission to appeal be granted, (2) the Judgment of **Mr Beltrami KC** and the Orders of **Mr Justice Bean** be set aside and that the Representation Application be granted.

Additional conclusions

92. In order not to violate the numbering of paragraphs, the conclusions drawn before the last updates are contained in paragraphs 82-91 above. Below will be additional conclusions arising from the updates. Before that, I want to note that information about "wrongdoing" by the Defendants is also public and I do not even mean my story, but the shocking stories of Olga Litvinenko (paragraphs 71-76 above) and Ben Worsley (paragraphs 77-81 above). In both cases, it is about criminal "wrongdoing" and no attempts were made to refute or remove this public information by the Defendants or other persons. I think the public nature of information about the Defendants' "wrongdoing" is a very eloquent "filter" (in the wording of **Mr Beltrami KC**).

93. The situation around these proceedings is so monstrous and extraordinary that I am absolutely sure that the British courts have never encountered anything like this. This situation requires a special approach on the part of the Court of Appeal, and the most obvious measure is referring this case (I mean case CL-2016-000831) to law enforcement agencies (in particular, to the National Crime Agency, where I may not directly apply due to procedural features).

94. Taking into account the monstrously shocking circumstances of the case, this case is no longer intended for consideration in the framework of civil proceedings, since the facts of death threats alone (I do not even talk about ordering my murder) dot the "i" both in the essence of the dispute and in the issue of jurisdiction. No adequate defendant will threaten a plaintiff with murder if the claim is wrong and/or filed in the "wrong" jurisdiction. Within the framework of civil proceedings, this case deserves only a summary judgment due to the obviousness of the situation (I have not yet met a single person who would not understand something about the essence of the conflict). But this case and the history of my relationship with the Defendants (in a broader sense) open up a lot of scope for the work of law enforcement agencies.

95. Above I mentioned the need to refer this case to the NCA. I already wrote about this, in particular, in paragraphs 14-17 of the letter of 25 May, which I will quote:

(14) I am talking about the need to take **very urgent measures**, since the correspondence directly states that in connection with the order for my murder (connected with these proceedings), I have very little time. **That is, now it is actually a matter of life and death**.

(15) I have to remind you that in Russia they have repeatedly tried to kill me, which was repeatedly covered by the press, including the British one[38]. Speaking of my submissions, I will refer to paragraphs 54-62 of my witness statement in case CA-2022-001211-B.

(16) I am writing this letter on an urgent basis and perhaps it should have been more detailed. But considering that my interlocutor declares that I could be killed by the Defendants in the very near future, I have prioritized urgency to the detriment of detail. I will try to supplement the letter (if I will be still alive).

(17) I have repeatedly written and said before that probably in the practice of English courts there have never been cases in which the defendant would have threatened the plaintiff with murder, and therefore this case is unique. Given recent events, this case has become shockingly extraordinary and therefore requires **URGENT** measures from the Courts which are adequate to this.

96. I believe that in these extraordinary circumstances, these proceedings should be suspended (stayed).

97. In addition, I think that in this case there is every reason to raise the question of perverting the course of justice. In my previous submissions (in particular, as part of the hearing held by Mr Justice Foxton, the results of which are being appealed in the framework of case CA-2023-000481), I have already spoken out on this topic. I will quote:

(1) I did not have time to delve deeply into the essence of this legal concept, but only got acquainted superficially, for example, using Wikipedia[39], where this term is defined as follows: "Perverting the course of justice is an offence committed when a person prevents justice from being served on themselves or on another party. In England and Wales it is a common law offence, carrying a maximum sentence of life imprisonment".

(2) It also lists the signs of perverting:

"Doing an act tending and intending to pervert the course of public justice is an offence under the common law of England and Wales.

Perverting the course of justice can be any of three acts:

Fabricating or disposing of evidence

Intimidating or threatening a witness or juror

Intimidating or threatening a judge

Also criminal are:

conspiring with another to pervert the course of justice, and

intending to pervert the course of justice".

(3) What I have underlined takes place in these proceedings. There is both forged evidence[40] and repeated threats against me. Surely there is also conspiracy. If what is written in Wikipedia is

correct, then in this case we can confidently say that there is a perverting of the course of justice.

98. Moreover, in this case, taking into account the latest development of events, it is not only about death threats, but about the possible order by the Defendants to kill the plaintiff.

99. In addition, I would like to reiterate that the information mentioned in paragraphs A to T above repeatedly refer to the Defendants' **corrupt activities** through solicitor **Edward Crosse** in order to stifle the lawsuit. If this is so, then the question that these proceedings are corrupt becomes relevant.

100. In my applications to the Court of Appeal in this case (CA-2022-001211-B), and in cases CA-2022-002495 and CA-2023-000481 now pending, I did not raise the issue of possible unfairness of the High Court. However, these proceedings in the High Court were going with a lot of strange things, which, due to the relevance of this aspect, I listed in my submission before Mr Justice Foxton (case CA-2023-000481). I mean paragraphs 16-64 of my submission dated 17 February (IS(A)2/419-430), where I listed the strange circumstances in detail. For example, this case was classified (allegedly by mistake) on the website of the High Court and many other circumstances which can make one think that the Defendants really did have an illegal influence on the High Court.

101. At the same time, some strange circumstances are directly related to **Mr Crosse and Simmons & Simmons**. I mean, it was with this firm that deputy judge **Mr Beltrami KC** turned out to be very closely connected, whose decision turned out to be fateful for the entire further course of these proceedings, since he essentially stifled the lawsuit. This decision is the subject of this case (CA-2022-001211-B).

102. **I also believe that taking into account very recent events (paragraphs A to T), the activities of Mr Crosse should be thoroughly investigated by the competent authorities**. Especially in this regard, I ask you to pay attention to paragraphs J and K above (about the possibility that these proceedings can be corrupted).

103. I also want to repeat that **Mr Beltrami KC** did not take into account that I am a vulnerable party and did not take any action in this regard (more on this in paragraphs B to F above). Moreover, all those terrible and shocking circumstances that made me vulnerable were used by **Mr Beltrami KC** against me, the victim of these circumstances. After hearing and reading about very unusual things like death threats, the Judge, instead of taking extra time to look into this unusual and rare issue in more detail, did not want to study this issue and used the fact that I was talking about death threats, against me myself.

Statement of Truth

104. 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 ....

Igor Sychev