



Tuesday, May 13, 2025.

Attention: Mr Tomislav Gountchev

CC: Ms Kristina Kalcheva, Mr. Lior Mordechai Yaffe, Mr Cheleung Kim, CNP Law Equity Partners, Singapore Law Society, Ms. Daphne Tan, Mr. Arjun Ravindran

Subject: Immediate Disclosure Required - Forensic Evidence of Crypto Mixing, Wallet Control, and Corporate Structuring Irregularities

Dear Mr. Gunchev,

This correspondence follows my letter yesterday to your co-director, Ms. Kristina Kalcheva, regarding the increasingly undeniable structural, behavioral, and financial parallels between Jelurida Swiss SA and the [now-disgraced OneCoin operation](#), not least, the \$4 billion in value that was passed through Jelurida-controlled blockchains during from 2016 to 2018. That letter also raised serious concerns about the unexplained disappearance of over 2,000 BTC raised during your 2017-2018 ICO, an amount that, according to immutable blockchain records, was systematically laundered through Bitcoin mixers with no disclosed recipients, invoices, or justification.

Today, I am writing to you directly, and for transparency, this has been copied to the Singapore Law Society, and uploaded to <https://ignis.claims/tomislav-gountchev>, because you were not simply aware of this behavior. You were controlling it.

1. **You Controlled The Funds - And You Said So Yourself!**
I am in possession of internal Slack correspondence [see attached [tomi-who.pdf](#)] in which you personally stated: "I will however not approve anything related to the UN or WHO. I am not willing to support or be seen as supporting these organizations." before going on to state "you discussed it with Lior in the week when I was moving and didn't have time to learn about the WHO and the UN..." The document not only confirms who controlled Jelurida's funds, but also reveals a clear hierarchy - one in which you appeared able to overrule Mr. Lior Yaffe at will. In short, you were actively deciding when, how, and whether those funds were moved. **And they were moved into Bitcoin mixing infrastructures, with the express purpose of concealing source and destination!**
2. **Your GPG Key Was Used in Mixing-Related Communication**
I also hold verifiable, timestamped communications, using your own GPG key, that reference [technical creation data involving a cryptocurrency mixing technology called Enigma](#). As well as this signature being immutable, the Twitter message also references #NXT.
3. **Your Personal Github Contains A Forked Anonymous Decentralized Exchange Called Bitsquare**
Bitsquare describes itself as "a cross-platform desktop application that allows users to trade national currency (dollars, euros, etc) for bitcoin without relying on centralized exchanges such as Coinbase, Bitstamp or (the former) Mt. Gox." Its [whitepaper makes lots of references to the anonymous nature](#) of the peer-to-peer network.
4. **You Are Listed As One Of The Two Controlling Officers Of Jelurida Swiss, But Own 0% of the Company**
Curiously, despite your central role in the authorization and management of multi-million-dollar crypto assets, you hold no equity in Jelurida Swiss SA. The company's shares are held almost exclusively by Ms. Kalcheva and Mr. Yaffe, yet you, one of just two controlling officers, made financial decisions on behalf of the company and its token-holding investors. This kind of arrangement is highly irregular in any jurisdiction, and particularly so when paired with:
 - o Absence of officer compensation disclosure
 - o Documented movement of funds through anonymization layers

If Jelurida were a legitimate blockchain enterprise, this configuration makes no sense.

If it were a legacy laundering shell, it makes perfect sense.

5. **This Looks Like Laundering by Design**
The aggregate evidence - your control, your communications, your absence from the cap table, the use of mixers, and the total lack of transparency - supports the clear hypothesis that Jelurida was structured to extract and obscure funds, not to build products. And the behavior mirrors the OneCoin playbook almost identically:
 - o Bulgaria → Switzerland jurisdictional migration
 - o Officer-level fund concealment
 - o Internal control by non-shareholding parties
 - o Sudden ICO timing post-collapse of a major crypto fraud
 - o Reluctance to publish financials for years

At this point, even a passive regulator must begin to ask:

Was Jelurida part of OneCoin's second act? And were you one of the architects?

6. **Silence Will Be Interpreted as Consent**
You now have one final opportunity to address these facts before this matter is escalated - formally and publicly - to:
 - o The Monetary Authority of Singapore (MAS)
 - o The Swiss Financial Market Supervisory Authority (FINMA)
 - o Interpol's Financial Crimes Division
 - o Swiss criminal prosecutors

If you dispute the authenticity of the GPG key or the mixing-related messages, state so directly. If you deny controlling the wallet, explain the Slack quote. If you have no comment, you should prepare for that silence to be interpreted - legally, regulatorily, and publicly - as confirmation.

Sincerely,

James Malach

James Malach

Cc: Ms Kristina Kalcheva, Mr. Lior Mordechai Yaffe, Mr Cheleung Kim, CNP Law Equity Partners, Singapore Law Society, Ms. Daphne Tan, Mr. Arjun Ravindran