IN THE HIGH COURT OF SOUTH AFRICA

(GAUTENG DIVISION, PRETORIA)

In the matter between:	**Case number: 51546/2021**
DAVID CHRISTIAAN BOTHA	Applicant
(ID 631007 5105 087)	
and	
SHERIFF PRETORIA SOUTH EAST	First Respondent
THE STANDARD BANK OF SOUTH AFRICA LIMITED	Second Respondent
CITY OF TSHWANE	Third Respondent
VELILE TINTO INCORPORATED	Fourth Respondent
CYNTHIA DU PLESSIS	Fifth Respondent
LEGAL PRACTICE COUNCIL	Sixth Respondent
WANDEL PARK BODY CORPORATE	Seventh Respondent
COMMUNITY SCHEMES OMBUD SERVICES	Eighth Respondent
PASTOR TOM JOOSTE	Ninth Respondent
NICO FRANCOIS BOTHA	Tenth Respondent
REVEREND PETER MALAN	Eleventh Respondent
FINANCIAL SECTOR CONDUCT AUTHORITY	Twelfth Respondent

HENDRIK SAAYMAN	Thirteenth Respondent
NG MORELETA KERK	Fourteenth Respondent
NG KERK	Fifteenth Respondent
MOIRA ELIZABETH RETIEF	Sixteenth Respondent
LEON MALAN	Seventeenth Respondent
MIRIé TALJAARD	Eighteenth Respondent
SURITA KILIAN MARAIS	Nineteenth Respondent
ADV BERTI BLOM	Twentieth Respondent
HELENA VAN EMMENIS	Twenty-first Respondent
CHRISTELIKE MAATSKAPLIKE RAAD	Twenty-second Respondent
COMMISSIONER SARIE SNYMAN	Twenty-third Respondent
MAGISTRATE COMMISSION	Twenty-fourth Respondent
PRETORIA BAR	Twenty-fifth Respondent
CAPE TOWN BAR	Twenty-sixth Respondent
AFRIFORUM	Twenty-seventh Respondent
REGISTRAR OF DEEDS	Twenty-eighth Respondent

NOTICE OF MOTION

PART A: **<u>URGENT APPLICATION FOR INTERDICT *PENDENTE LITE*</u>**

BE PLEASED TO TAKE NOTICE that the Applicant intends to apply to the above Honourable Court on **TUESDAY 23 MAY 2023** at 10h00 or so soon thereafter as the matter may be heard, for an order in the following terms:

1. Dispensing with the ordinary rules relating to forms, services and time periods and permitting this application to be heard as one of urgency in terms of the rule 6(12) of the Uniform Rules of this Honourable Court;

2. That pending the final adjudication of relief set forth in **PART B** of this Notice of Motion,

   2.1 interdicting the Twenty-eighth Respondent from approving the transfer of the immovable property of the Applicant being a unit consisting of –

   SECTION NUMBER 1 as shown and more fully described on **SECTIONAL PLAN NO. SS301/1985, IN THE SCHEME KNOWN AS WANDELPARK** in respect of the land and building or buildings situate at **ERF 1842 GARSFONTEIN EXTENSION 8 TOWNSHIP**; local authority: City of Tshwane Metropolitan Municipality of which the floor area, according to the said sectional plan, is 207 (two hundred and seven) square meters in extent; and an undivided share in the common property in the scheme apportioned to the said section in accordance with the participation quota as endorsed on the said sectional plan held by DEED OF TRANSFER NUMBER ST89207/2003 and subject to such conditions as set out in the aforesaid deed of transfer of the property also known as: 1 WANDEL PARK, 522 ALSATIAN ROAD, GARSFONTEIN, PRETORIA.

2.2 setting aside the warrant of execution order and the notice of sale in execution order obtained by the Second Respondent and the foreclosure sale of the immovable property of the Applicant known as Unit No 1, Wandel Park, 522 Alsatian Drive, Garsfontein Extension 8, Pretoria;

2.3 the Second Respondent be interdicted and restrained from conspiring with the Respondents and other parties to prevent the competition by the National Property Database developed by the Applicant;

2.4 the Third Respondent be interdicted and restrained from disconnecting the electricity supply to the Immovable Property of the Applicant known as Unit No 1, Wandel Park, 522 Alsatian Drive, Garsfontein Extension 8, Pretoria after having fraudulently installed 3 (three) faulty electricity metering units consecutively and continuously instituting fraudulent legal action to force the Applicant to pay the fraudulent arrears;

2.5 the Fourth Respondent be interdicted and restrained from conspiring with the Respondents and other parties to prevent the competition by the National Property Database developed by the Applicant;

2.6 the Fifth Respondent be interdicted and restrained from conspiring with the Respondents and other parties to prevent the competition from the National Property Database developed by the Applicant;

2.7 the Seventh Respondent be interdicted and restrained from:

(a) conspiring with the Respondents and other parties in subjecting the Applicant to a witch hunt to fraudulently avoid paying the Applicant or an organization owned by the Applicant, NSA Developments CC, trading as Interveners Management Consultants, CK Number 1995/041792/23, for having delivered emergency safety and maintenance services from the neglect by the Seventh Respondent to provide for maintenance and to maintain their common property;

(b) tampering with or neglecting to secure entrances to their premises resulting in intruders gaining easy access;

(c) from obstructing the Applicant from gaining entrance to the unit of the Applicant in any way;

(d) withholding keys to all communal entrances and entrances to the premises of the Seventh Respondent and the unit of the Applicant;

(e) undermining, tampering, interfering with the gate motor or mechanism providing access to the premises of the Seventh Respondent and to the unit of the Applicant;

(f) undermining, tampering or interfering with electricity metering, or disconnecting the electricity supply to the unit of the Applicant;

(g) undermining, tampering or interfering with water metering or disconnecting water supply to the unit of the Applicant;

(h) invading the privacy of the Applicant;

2.8 the Ninth Respondent be interdicted and restrained from invading the privacy of the Applicant and from conspiring with the Respondents and other parties to conceal the fraud and elder abuse committed by the Ninth, Tenth and Eleventh Respondents against the deceased parents of the Applicant;

2.9 the Tenth Respondent be interdicted and restrained from invading the privacy of the Applicant and from conspiring with the Respondents and other parties to conceal the fraud and elder abuse committed by the Ninth, Tenth and Eleventh Respondents against the deceased parents of the Applicant;

2.10 the Eleventh Respondent be interdicted and restrained from invading the privacy of the Applicant and from conspiring with the Respondents and other parties to conceal the fraud and elder abuse committed by the Ninth, Tenth and Eleventh Respondents against the deceased parents of the Applicant;

2.11 the Sixteenth Respondent be interdicted and restrained from invading the privacy of the Applicant and from conspiring with the

Respondents and other parties to conceal the fraud and child abuse committed by the Thirteenth, Fourteenth, Sixteenth, Seventeenth, Eighteenth, Nineteenth, Twentieth, Twenty-first, Twenty-third Respondents during the divorce and child custody applications by the Applicant;

2.12 the Twentieth Respondent be interdicted and restrained from invading the privacy of the Applicant and from conspiring with the Respondents and other parties to conceal the fraud and child abuse committed by the Thirteenth, Fourteenth, Sixteenth, Seventeenth, Eighteenth, Nineteenth, Twentieth, Twenty-first, Twenty-third Respondents during the divorce and child custody applications by the Applicant.

3. That any of the Respondents who oppose the application are ordered, jointly and severally, to pay the costs of the application.

4. That the Applicant be granted further and/or alternative relief.

TAKE FURTHER NOTICE that the Applicant has appointed the address as listed below as the address he will receive service of any notices or answering affidavits filed.

TAKE FURTHER NOTICE that if any Respondent intend to oppose **PART A** of this application, they are required:

1. to notify the Applicant and the Registrar of this Honourable Court by no later than **12 MAY 2023 at 16h00;**

2. to appoint an address in terms of Rule 6(5)(b) as an address at which they will accept notice and service of all documents in these proceedings;

3. by no later than **17 MAY 2023 at 12h00** to deliver their Answering Affidavit(s) if any;

4. by no later than **19 MAY 2023 at 12h00** to deliver Replying Affidavits.

PART B: <u>DECLARATORS</u>

TAKE FURTHER NOTICE that the Applicant intent applying to the above Honourable Court on a date to be arranged with the Registrar or the Honourable Deputy Judge President for an order in the following terms:

Orders of general application

1. Declaring that the warrant of execution order and the sale in execution order, obtained on 8 SEPTEMBER 2022 by the Second Respondent and the public auction on 28 FEBRUARY 2023 by the First Respondent is invalid and constitutes fraud and perjury, in that the Supplementary Affidavit and Confirmatory Affidavit, as noted per Default Judgement application on 11 FEBRUARY 2022, per Notice of Set Down application, Case Number 51546/2021, on 15 JULY 2022 had fraudulently declared that a telecommunication had taken place between the secretary of the legal representative, Vesi & De Beer Incorporated, on record of the Second Respondent and the Applicant on 17 MARCH 2022 and is in contravention of:

   (a) section 269A(b) of the Criminal Procedure Act 51 of 1977 in that fraud had been committed from in that the said telecommunication had not taken place between the secretary of the legal representative on record of the Second Respondent and the Applicant on 17 MARCH 2022;

   (b) section 4(a)(iv) of the Banks Act 94 of 1990 from the failure by their directors to have reported the failure by the employees of their Legal Department to maintain high ethical standards and to conduct the bank's business practices above reproach;

(c) section 3(d)(f) the Legal Practice Act 28 of 2014 in that their legal representatives on record had not protected the Applicant and had not provided fair, effective, efficient treatment to the Applicant after the Applicant had reported the fraudulent actions by their legal representatives on record;

(d) section 5(a)(c)(f)(g)(k) of the Legal Practice Act 28 of 2014 in that their legal representatives on record had not provided ethical conduct to the Applicant from their lack of integrity and in that the rule of law had not been upheld by them.

2. Declaring that the warrant of execution order and the sale in execution order obtained on 8 SEPTEMBER 2022 by the Second Respondent and the foreclosure sale on 28 FEBRUARY 2023 over the property known as: 1 WANDEL PARK, 522 ALSATIAN ROAD, GARSFONTEIN, PRETORIA, by the First Respondent is invalid in that the Affidavit in Support of the Default Judgement application on 11 FEBRUARY 2022, per Notice of Set Down application, Case Number 51546/2021, on 15 JULY 2022 had misrepresented the communication between the employees of the Second Respondent and the Applicant, since on or about AUGUST 2008 and is in contravention of:

(a) section 269A(b) of the Criminal Procedure Act 51 of 1977 in that fraud had been committed in having misrepresenting the communication between the employees of the Second Respondent and the Applicant to serve as proof of the bona fides of the Second Respondent;

(b) section 4(a)(iv) of the Banks Act 94 of 1990 in that the employees of their Legal Department had failed to maintain high ethical standards and not having conducted the bank's business practices above reproach in having committed fraud, contravening the Competition Act 89 of 1998 and for conspiring;

(c) section 3(d)(f) the Legal Practice Act 28 of 2014 by their legal representatives on record in that the Applicant had not been protected as client and had not received fair, effective, efficient treatment before and after the Applicant had reported the fraudulent actions taken by legal representatives on record of the Second Respondent;

(d) section 5(a)(c)(f)(g)(k) of the Legal Practice Act 28 of 2014 by their legal representatives on record in them having failed to practice ethically and with integrity and to uphold the rule of law.

3. Reviewing and setting aside the warrant of execution and the sale in execution orders obtained by the Second Respondent on 5 APRIL 2022 and the transfer of the immovable property of the Applicant after the foreclosure sale or auction held on 28 FEBRUARY 2023 of the property also known as: 1 WANDEL PARK, 522 ALSATIAN ROAD, GARSFONTEIN, PRETORIA.

4. Declaring that the Second Respondent had breached:

(a) section 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 in having conspired on or about 2009, with the Fourth Respondent, as law firm and the Fifth Respondent, as director of the Fourth Respondent, whom had conspired, since on or about OCTOBER 2006, to prevent the competition the National Property Database project, developed by the Applicant, held and holds for the monopoly holders in the property sales, décor advertising and bond origination industries;

(b) section 4(1)(a) of the Competition Act 89 of 1998 in having lessoned and prevented the competition the National Property Database project, developed by the Applicant, held and holds for the monopoly holders in the property sales, décor advertising and bond origination industries, from the Second Respondent whom had been subjecting the Applicant to a fraudulent witch hunt, after them having conspired, since on or about 2009, with the Fourth and Fifth Respondents, whom had conspired on or about OCTOBER 2006 to prevent the competition the National Property Database project, developed by the Applicant, held and holds for the monopoly holders in the property sales, décor advertising and bond origination industries;

(c) section 16(1)(a)(e) of the Financial Advisory and Intermediary Services Act 37 of 2002 in having failed to act honestly, fairly, with care and diligence and in the interest of the Applicant and the integrity of the financial services industry, in their appointments of the unscrupulous legal representatives, Vesi & De Beer Incorporated and Van Hulsteyns Attorneys whom had contravened multiple sections of the Attorneys Act 53 of 1979, Rules for the Attorney's Profession, Competition Act, Criminal Procedure Act 51 of 1977, Prevention and Combating of Corrupt Activities Act 12 of 2004 and the Bill of Rights of The Constitution of South Africa, of which this application bares proof, as a result of Vesi & De Beer Incorporated and Van Hulsteyns Attorneys having conspired with the Fourth and Fifth Respondents whom had fraudulently and unlawfully taken possession of the trust funds of the Applicant with the purpose to prevent the competition the National Property Database project, developed by the Applicant, held and holds for the monopoly holders in the property sales, décor advertising and bond origination industries;

(d) section 16(1)(d) of the Financial Advisory and Intermediary Services Act 37 of 2002 in having failed to act fairly from the conflict of interest which had arisen between the clients of the Second Respondent in the property sales, décor advertising and bond origination industries and the clients of the Applicant in the property sales, décor advertising and bond origination industries;

(e) section 34(1)(d) of the Financial Advisory and Intermediary Services Act 37 of 2002 in having harmed the relations between the Second Respondent and the Applicant as financial services providers and the Applicant as a client of the Second Respondent and in having demonstrated an unreasonable prejudice towards the Applicant and in having deceived and affected the Applicant unfairly, deriving from them having conspired, since on or about 2009, with the Fourth and Fifth Respondents, whom had conspired on or about OCTOBER 2006, to prevent the competition the National Property Database project, developed by the Applicant, held and holds for the monopoly holders in the property sales, décor advertising and bond origination industries;

(f) section 40(4)(a)(iv) of the Banks Act 94 of 1990 in the failure by their directors to have reported, since on or about 2009, the failure by the employees in their legal department to maintain high ethical standards towards the Applicant as a client of the Second Respondent and to conduct the bank’s business practices above reproach, in them having conducted a fraudulent witch hunt after the Second Respondent had conspired with the Fourth and Fifth Respondents to prevent the competition the National Property Database project, developed by the Applicant, held and holds for the monopoly holders in the property sales, décor advertising and bond origination industries;

(g) section 9 of The Constitution of the Republic of South Africa Act 108 of 1996, in having prevented the Applicant, as client of the Second Respondent, to receive equal protection and benefit of the law from the conspiring by the Second Respondent with the Fourth and Fifth Respondents, to subject the Applicant to a fraudulent witch hunt with the purpose to prevent the competition the National Property Database project, developed by the Applicant, held and holds for the monopoly holders in the property sales, décor advertising and bond origination industries;

(h) section 9 of The Constitution of the Republic of South Africa Act 108 of 1996, in that the Applicant had not received equal protection and benefit of the law from the conspiring by the Second Respondent as creditor of the Applicant, to subject the Applicant to a fraudulent witch hunt with the purpose to prevent competition, resulting in the undermining of the ability of the Applicant to meet his obligations towards his home loan repayments to the Second Respondent;

(i) section 269A(b) of the Criminal Procedure Act 51 of 1977 in having committed fraud by conspiring to prevent the competition the National Property Database project, developed by the Applicant, held and holds for the monopoly holders in the property sales, décor advertising and bond origination industries;

(j) section 3(h) of the National Credit Act 34 of 2005 in them not having promoted a fair and responsible credit market from their failure to protect the Applicant in not having provided a consistent and accessible system to consensually resolve the disputes which had arose from their credit agreement with the Applicant since 2009;

(k) section 3(i) of the National Credit Act 34 of 2005 in them not having promoted a fair and responsible credit market from their failure to protect the Applicant in not having provided a consistent and harmonised system to restructure the debt since 2009, to enforce and to seek judgement against the Applicant in prioritising the satisfaction of the Applicant as a responsible consumer since 2009;

(l) section 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004, in having conspired with the Seventh Respondent, after having conspired with the Second, Third and Fifth Respondents, to subject the Applicant to a witch hunt to further strain the Applicant financially, after the Applicant had fallen in arrears on his sectional title levy payments towards the Seventh Respondent, whom as the Body Corporate of the Applicant had fraudulently been avoid paying the Applicant or his organization, NSA Developments CC, trading as Interveners Management Consultants, CK Number 1995/041792/23, for having delivered emergency safety and maintenance services to the Seventh Respondent.

5. Declaring that the conspiring by the Second Respondent with the Fourth and Fifth Respondents, had led to the appointment of Vesi & De Beer Incorporated as legal representative, on or about 2009, to subject the Applicant to a fraudulent witch hunt during which Vesi & De Beer Incorporated whom had orchestrated their fraudulent legal actions against the Applicant in alignment with the other respondents, had fraudulently obtained a sale in execution order, on or about APRIL 2016, without having been briefed by the Second Respondent and without having notified the Applicant of such action from the conspiring by Vesi & De Beer Incorporated with the First Respondent and to delay the delivery of the Notice of Sale in Execution to the Applicant with 23 (twenty three) days, is in contravention of:

(a) rule 40.1; rule 40.2; rule 40.2.2 of the Rules for the Attorney's Profession in having failed to maintain the highest standards of honesty and integrity and to treat the interests of the Applicant as paramount and the interests of justice;

(b) rule 40.4 of the Rules for the Attorney's Profession in having failed to refrain from doing anything in a manner prohibited by law or by the code of conduct of the profession resulting in them having placed their interests and of other clients in conflict with that of the Applicant;

(c) rule 40.14 of the Rules for the Attorney's Profession in them having brought the attorney's profession in disrepute.

6. Declaring that the reappointment of Vesi & De Beer Incorporated by the Second Respondent as legal representative on or about 2021, after the withdrawal by Van Hulsteyns Attorneys as legal representative on or about 2021 to abstain from subjecting the Applicant to the fraudulent witch hunt instructed by the Second Respondent, had constituted fraud in that the reappointment by the Second Respondent had been an attempt to conceal the multiple fraudulent legal actions by Vesi & De Beer Incorporated since their first appointment as legal representative on or about 2009 and to conceal the fraudulent sale in execution order obtained by Vesi & De Beer Incorporated on or about APRIL 2016 in contravention of:

(a) section 269A(b) of the Criminal Procedure Act 51 of 1977 in that fraud had been committed;

(b) section 40(4)(a)(iv) of the Banks Act 94 of 1990 from the failure by the directors of the Second Respondent to have reported the failure by the employees of their Legal Department to maintain high ethical standards and to conduct the bank's business practices above reproach;

(c) section 3(h) of the National Credit Act 34 of 2005 in them not having promoted a fair and responsible credit market from their failure to protect the Applicant in not having provided a consistent and accessible system to consensually resolve the disputes which had arose from their credit agreement with the Applicant since 2009;

(d) section 3(i) of the National Credit Act 34 of 2005 in them not having promoted a fair and responsible credit market from their failure to protect the Applicant in not having provided a consistent and harmonised system to restructure the debt since 2009, to enforce and to seek judgement against the Applicant in prioritising the satisfaction of the Applicant as a responsible consumer since 2009.

7. Declaring that the appointment of Van Hulsteyns Attorneys as legal representative by the Second Respondent on 28 NOVEMBER 2017 had been a breach of trust, constituted fraud and in contravention of:

(a) section 269A(b) of the Criminal Procedure Act 51 of 1977 in that Van Hulsteyns Attorneys had been furnished with a fraudulent briefing report upon their appointment as legal representative with the purpose to conceal the true state of events which had led to the withdrawal of Vesi & De Beer Incorporated as representative or record by the Second Respondent, in or about 2017;

(b) section 269A(b) of the Criminal Procedure Act 51 of 1977 in that Van Hulsteyn Attorneys had fraudulently delayed for 12 (twelve) months to furnish the Applicant with a transcription of the voice recording of the meeting held on 17 OCTOBER 2017 at 11h00 between attorney Daniel Raath at Van Hulsteyns Attorneys and the Applicant;

(c) section 3(d)(f) of the Legal Practice Act 28 of 2014 in that the Applicant had not been protected or had not received fair, effective, efficient treatment as client of the Second Respondent;

(d) section 269A(b) of the Criminal Procedure Act 51 of 1977 in that the *mala fide* Second Respondent had not upheld the agreement reached on 28 NOVEMBER 2017, between the Applicant and the Second Respondent, as arranged by attorney Daniel Raath at Van Hulsteyns Attorneys, from the latter whom had indicated to the Applicant that the Second Respondent will proceed with legal action against the Applicant after the Applicant had informed attorney Daniel Raath, prior to the due date, that the third consecutive enhanced payment by the Applicant, will be made a few days after the due date;

(e) section 3(h) of the National Credit Act 34 of 2005 in them not having promoted a fair and responsible credit market from their failure to protect the Applicant in not having provided a consistent and accessible system to consensually resolve the disputes which had arose from their credit agreement since 2009 with the Applicant;

(f) section 3(i) of the National Credit Act 34 of 2005 in them not having promoted a fair and responsible credit market from their failure to protect the Applicant in not having provided a consistent and harmonised system to restructure the debt since 2009, to enforce and to seek judgement against the Applicant in prioritising the satisfaction of the Applicant as a responsible consumer since 2009.

8. Declaring that the unlawfully obtained a sale in execution order against the immovable property of the Applicant on or about APRIL 2016 by Vesi & De Beer Incorporated on record of the Second Respondent, without having been instructed by the Second Respondent, as had been admitted by the Legal Department of the Second Respondent and the conspiring by the Second Respondent with the First Respondent to intentionally delay the delivery of the notice of sale in execution order to the Applicant with 23 (twenty three) days, as had been admitted by the First Respondent, is in contravention of:

(a) section 269A(b) of the Criminal Procedure Act 51 of 1977 in that fraud had been committed in having intentionally delayed the delivery of the notice of sale in execution order to the Applicant;

(b) section of 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 from the conspiring by the Second Respondent with the First Respondent to delay for 23 (twenty three) days to deliver the notice of sale in execution order to the Applicant before or about 1 APRIL 2016;

(c) section 3(h) of the National Credit Act 34 of 2005 in them not having promoted a fair and responsible credit market from their failure to protect the Applicant in not having provided a consistent and accessible system to consensually resolve the disputes which had arose from their credit agreement with the Applicant since 2009;

(d) section 3(i) of the National Credit Act 34 of 2005 in them not having promoted a fair and responsible credit market from their failure to protect the Applicant in not having provided a consistent and harmonised system to restructure the debt since 2009, to enforce and to seek judgement against the Applicant in prioritising the satisfaction of the Applicant as a responsible consumer since 2009.

9. Declaring that the First Respondent had breached:

(a) section 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004, in having conspired with the Second Respondent to delay the delivery of the notice of the sale in execution order obtained by the Second Respondent, to the Applicant before or about 1 APRIL 2016;

(b) section 43(1)(a) of the Sheriffs Act 90 of 1986 in having been dilatory to delivery of the notice of sale in execution order to the Applicant before or about 1 APRIL 2016, as had been admitted by the First Respondent;

(c) section 43(1)(e) of the Sheriffs Act 90 of 1986 from their failure to have taken all reasonable steps on or about APRIL 2016, to prevent their deputy sheriff to commit improper conduct in having been dilatory for 23 (twenty three) days to deliver the notice of sale in execution order to the Applicant before or about 1 APRIL 2016;

10. Declaring that the Fourth Respondent had breached:

(a) section 4(1)(a) of the Competition Act 89 of 1998 in having, conspired with the Fifth Respondent, as a director of the Fourth Respondent, to fraudulently withhold and taking possession of trust funds of the Applicant on 30 NOVEMBER 2006, in their attempt to prevent the competition the National Property Database project, developed by the Applicant, had held and holds for the monopoly holders in the property sales, décor advertising and bond origination industries;

(b) section 78(7) of the Attorneys Act 53 of 1979 in having conspired with the Fifth Respondent, as a director of the Fourth Respondent, to fraudulently withhold and taking possession of trust funds of the Applicant on 30 NOVEMBER 2006;

(c) rule 35.13.2 of the Rules for the Attorney's Profession in the failure by the Fourth Respondent to report to the Legal Practice Council in writing the theft of the trust funds of the Applicant by the Fifth Respondent, as a director of the Fourth Respondent;

(d) rule 35.13.7.1.6 of the Rules for the Attorney's Profession in them having failed to receive written authorisation to withdraw the trust funds of the Applicant for their own benefit on 30 NOVEMBER 2006;

(e) rule 35.13.14 of the Rules for the Attorney's Profession from the withdrawal of the trust funds of the Applicant from their trust account by the Fifth Respondent for the benefit of the Fifth Respondent and not for the benefit of the Applicant as trust creditor on 30 NOVEMBER 2006;

(f) rule 35.13.14.2.2 of the Rules for the Attorney's Profession in their failure to pay the Applicant on 30 NOVEMBER 2006, from their contractual obligation towards the Applicant after the Fifth Respondent, as a director of the Fourth Respondent had conveyed a bond extension on behalf of the Applicant;

(g) rule 40.1; rule 40.2; rule 40.2.2 of the Rules for the Attorney's Profession in their failure to maintain the highest standards of honesty and integrity and to treat the interests of the Applicant as paramount and the interests of justice, from having fraudulently withholding and taking possession of the trust funds of the Applicant to prevent the competition the National Property Database project, developed by the Applicant, had held and holds for the monopoly holders in the property sales, décor advertising and bond origination industries;

(h) rule 40.4 of the Rules for the Attorney's Profession in their failure to refrain from doing anything in a manner prohibited by law or by the code of conduct of the profession and in them having placed their interests and of other clients in conflict with that of the Applicant, to result in fraudulently withholding trust funds of the Applicant on 30 NOVEMBER 2006, to prevent the competition the National Property Database project, developed by the Applicant, had held and holds for the monopoly holders in the property sales, décor advertising and bond origination industries;

(i) rule 40.7 of the Rules for the Attorney's Profession in them having failed to account faithfully, accurately and to timeously transfer the full trust fund amount to the Applicant on 30 NOVEMBER 2006;

(j) rule 40.14 of the Rules for the Attorney's Profession in them having brought the attorney's profession in disrepute from them having fraudulently withholding and taking possession of the trust funds of the Applicant on 30 NOVEMBER 2006, to prevent the competition the National Property Database project, developed by the Applicant, had held and holds for the monopoly holders in the property sales, décor advertising and bond origination industries;

(k) section 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004, in having conspired, on or about NOVEMBER 2006, with the Fifth Respondent, whom had breached contract with the Applicant on or about OCTOBER 2006 to subject the Applicant to a witch hunt to prevent the competition the National Property Database project, developed by the Applicant, had held and holds for the monopoly holders in the property sales, décor advertising and bond origination industries;

(l) section 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004, in having conspired with the Fifth Respondent on or about 2006, to subject the Applicant to a witch hunt and to conspire with the Second Respondent, on or about 2009, after the Applicant had fallen in arrears on his bond repayments towards the Second Respondent, on or about 2008, to subject the Applicant to a witch hunt to financially strain the Applicant after the Applicant had launched the National Property Database project in MAY 2008, to lessen and prevent the competition the National Property Database project, developed by the Applicant, had held and holds for the monopoly holders in the property sales, décor advertising and bond origination industries;

(m) section 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 in having conspired with the Third Respondent to fraudulently install three consecutive faulty electricity meters, in 2010, 2011 and 2012, to result in false meter readings and false billing to further strain the Applicant financially;

(n) section 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004, in having conspired with the Seventh Respondent, after having conspired with the Second, Third and Fifth Respondents, to subject the Applicant to a witch hunt to further strain the Applicant financially, after the Applicant had fallen in arrears on his sectional title levy payments towards the Seventh Respondent, whom as the Body Corporate of the Applicant had fraudulently been avoid paying the Applicant or his organization, NSA Developments CC, trading as Interveners Management Consultants, CK Number 1995/041792/23, for having delivered emergency safety and maintenance services to the Seventh Respondent;

(o) section 269A(a) of the Criminal Procedure Act 51 of 1977 in having committed theft of the trust funds of the Applicant on 30 NOVEMBER 2006;

(p) section 9 of The Constitution of the Republic of South Africa Act 108 of 1996, in having prevented the Applicant to receive equal protection and benefit of the law in them having conspired to unlawfully withhold and to take possession of trust funds of the Applicant on 30 NOVEMBER 2006, to prevent the competition the National Property Database project, developed by the Applicant, had held and holds for the monopoly holders in the property sales, décor advertising and bond origination industries;

(q) section 3(d) and section 5 (a)(c)(f)(g)(k)(l) of the Legal Practice Act 28 of 2014 in having unlawfully withholding and taking possession of trust funds of the Applicant on 30 NOVEMBER 2006 to result:

(i) in not having protected and promoted the interest of the Applicant;

(ii) in not having acted professional, accountable and efficient;

(iii) in not having acted ethically;

(iv) in not having upheld and advanced the rule of law.

11. Declaring that the Fifth Respondent had breached:

(a) section 4(1)(a) of the Competition Act 89 of 1998 in having, conspired with the Fourth Respondent, as a director of the Fourth Respondent on 30 NOVEMBER 2006, to fraudulently withhold and to take possession of trust funds of the Applicant on 30 NOVEMBER 2006, to prevent the competition the National Property Database project, developed by the Applicant, had held and holds for the monopoly holders in the property sales, décor advertising and bond origination industries;

(b) section 78(7) of the Attorneys Act 53 of 1979 in having, together with the Fourth Respondent, as a director of the Fourth Respondent, fraudulently withholding and taking possession of trust funds of the Applicant on 30 NOVEMBER 2006;

(c) rule 35.13.7.1.6 of the Rules for the Attorney's Profession in having failed to receive written authorisation to withdraw the trust funds of the Applicant for her own benefit on 30 NOVEMBER 2006;

(d) rule 35.13.14 of the Rules for the Attorney's Profession in having made a withdrawal of the trust funds of the Applicant from the trust account of the Fourth Respondent on 30 NOVEMBER 2006, for the benefit of the Fourth and Fifth Respondents and not for the benefit of the Applicant as trust creditor;

(e) rule 35.13.14.2.2 of the Rules for the Attorney's Profession in having failed to make a withdrawal from the trust account of the Fourth Respondent on 30 NOVEMBER 2006, from the contractual obligation towards the Applicant;

(f) rule 40.1; rule 40.2; rule 40.2.2 of the Rules for the Attorney's Profession in having failed to maintain the highest standards of honesty and integrity and to treat the interests of the Applicant as paramount and the interests of justice, in having fraudulently withholding and taking possession of the trust funds of the Applicant on 30 NOVEMBER 2006, to prevent the competition the National Property Database project, developed by the Applicant, had held and holds for the monopoly holders in the property sales, décor advertising and bond origination industries;

(g) rule 40.4 of the Rules for the Attorney's Profession in having failed to refrain from doing anything in a manner prohibited by law or by the code of conduct of the profession resulting in having placed her interests and of other clients in conflict with that of the Applicant from having fraudulently withholding and taking possession of trust funds of the Applicant on 30 NOVEMBER 2006, to prevent the competition the National Property Database project, developed by the Applicant, had held and holds for the monopoly holders in the property sales, décor advertising and bond origination industries;

(h) rule 40.7 of the Rules for the Attorney's Profession in having failed to account faithfully, accurately and to timeously transfer the full trust fund amount to the Applicant on 30 NOVEMBER 2006;

(i) rule 40.14 of the Rules for the Attorney's Profession in having brought the attorney's profession in disrepute from having fraudulently withholding and takin trust funds of the Applicant on 30 NOVEMBER 2006, to prevent the competition the National Property Database project, developed by the Applicant, had held and holds for the monopoly holders in the property sales, décor advertising and bond origination industries;

(j) section 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004, in having conspired with the Fourth Respondent on or about NOVEMBER 2006, after having breached contract with the Applicant on or about OCTOBER 2006 and to subject the Applicant to a witch hunt to prevent the competition the National Property Database project, developed by the Applicant, had held and holds for the monopoly holders in the property sales, décor advertising and bond origination industries;

(k) section 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004, in having conspired with the Second Respondent after the Applicant had fallen in arrears on his bond repayments towards the Second Respondent, on or about 2009, to subject the Applicant to a fraudulent witch hunt to financially strain the Applicant after the Applicant had launched the National Property Database project in MAY 2008;

(l) section 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 from having conspired with the Second and Fourth Respondents and to conspire with the Third Respondent to fraudulently install three faulty electricity meters, in 2010, 2011 and 2012, to result in false meter readings and false arrears to further strain the Applicant financially;

(m) section 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004, in having conspired with the Seventh

Respondent, after having conspired with the Second, Third and Fourth Respondents, to subject the Applicant to a witch hunt and to further strain the Applicant financially, after the Applicant had fallen in arrears on his sectional title levy payments towards the Seventh Respondent, whom as the Body Corporate of the Applicant had fraudulently been avoid paying the Applicant or his organization, NSA Developments CC, trading as Interveners Management Consultants, CK Number 1995/041792/23 in having delivered emergency safety and maintenance services to the Seventh Respondent;

(n) section 269A(a) of the Criminal Procedure Act 51 of 1977 in having committed theft of the trust funds of the Applicant on on 30 NOVEMBER 2006;

(o) section 9 of The Constitution of the Republic of South Africa Act 108 of 1996, in having prevented the Applicant to receive equal protection and benefit of the law in having conspired with the Fourth respondent to unlawfully withhold and to take possession of the trust funds of the Applicant on 30 NOVEMBER 2006 to prevent the competition the National Property Database project, developed by the Applicant, had held and holds for the monopoly holders in the property sales, décor advertising and bond origination industries;

(p) section 3(d) and section 5 (a)(c)(f)(g)(k)(l) of the Legal Practice Act 28 of 2014 in having unlawfully withholding and taking possession of trust funds of the Applicant on 30 NOVEMBER 2006 to result:

(i) in not having protected and promoted the interest of the Applicant;

(ii) in not having acted professional, accountable and efficient towards the Applicant;

(iii) in not having acted ethically towards the Applicant;

(iv) in not having upheld and advanced the rule of law.

12. Declaring that the Sixth Respondent had breached section 3(d)(f) of the Legal Practice Act 28 of 2014 in having failed their obligation to investigate the contraventions by:

(a) the Fourth and Fifth Respondents as described in the preceding paragraphs 10 and 11;

(b) Mr Reynault Meintjes, from Rorich Wolmarans & Luderitz Incorporated, as the legal representative on record of the Seventh Respondent, as described the paragraph 14 to follow;

(c) the Seventeenth Respondent, as described the paragraph 29 to follow;

(d) the Nineteenth Respondent, as described the paragraph 29 to follow.

13. Declaring that Third Respondent had breached:

(a) section 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004, in having conspired with the Second, Fourth, Fifth and Seventh Respondents and to have fraudulently installed three faulty electricity metering equipment, consecutive in 2010, 2011 and 2012, to result in false meter readings and false arrears, upon which the Third Respondent subjected the Applicant to a fraudulent witch hunt and to continue to disconnect the electricity supply to the unit of the Applicant from his refusal to be held accountable for the false arrears on his electricity account;

(b) section 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 in them having fraudulently subjected the Applicant to a witch hunt and to fraudulently charge the Applicant for false electricity usage, as described in the preceding paragraph 13(a);

(c) section 73(2)(a)(b) of the Municipal Systems Act No 32 of 2000 in their failure to be equitable and to provide prudent, economic, efficient and effective service to the Applicant in having fraudulently subjected the Applicant to a witch hunt and to fraudulently charge the Applicant for false electricity usage, as described in the preceding paragraph 13(a);

(d) section 269A(b) of the Criminal Procedure Act 51 of 1977 in having fraudulently installed 3 (three) faulty electricity metering equipment to fraudulently subject the Applicant to a witch hunt and to fraudulently charge the Applicant for false electricity usage, as described in the preceding paragraph 13(a).

14. Declaring that the Seventh Respondent had breached:

(a) section 269A(b) of the Criminal Procedure Act 51 of 1977 in having fraudulently avoiding to remunerate the Applicant or the organization owned by the Applicant, NSA Developments CC, trading as Interveners Management Consultants, CK Number 1995/041792/23, the amount of R500, 236, 00 (five hundred thousand two hundred and sixty three rand), after the Applicant had delivered emergency safety and maintenance services to the Seventh Respondent, after manslaughter and armed assaults had taken place on the premises of the Seventh Respondent from the neglect by the Seventh Respondent to provide for maintenance and to maintain their common property;

(b) section 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 in having conspired with the Second, Third, Fourth and Fifth Respondents, on or about 2010, to subject the Applicant to a witch hunt with the purpose to fraudulently avoid remunerating the Applicant or the organization owned by the Applicant, NSA Developments CC, trading as Interveners Management Consultants, CK Number 1995/041792/23, the amount of R500, 236, 00 (five hundred thousand two hundred and sixty three rand), after the Applicant had delivered emergency safety and maintenance services to the Seventh Respondent, after manslaughter and armed assaults had taken place on the premises of the Seventh Respondent due to the neglect by the Seventh Respondent to provide for maintenance and to maintain their common property;

(c) section 37(1)(a) of the Sectional Titles Act of 95 of 1986 in:

(i) not having made provision for the repair of a communal wall, prior to the Applicant and the organization owned by the Applicant, NSA Developments CC, trading as Interveners Management Consultants, CK Number 1995/041792/23, having delivered emergency safety and maintenance services to the Seventh Respondent;

(ii) not having made provision to raise their street front border walls, prior to the Applicant and the organization owned by the Applicant, NSA Developments CC, trading as Interveners Management Consultants, CK Number 1995/041792/23, having delivered emergency safety and maintenance services to the Seventh Respondent;

(iii) having neglected to up keep security, prior to the Applicant and the organization owned by the Applicant, NSA Developments CC, trading as Interveners Management Consultants, CK Number 1995/041792/23, having delivered emergency safety and maintenance services to the Seventh Respondent;

(iv) in having failed to make provision for future maintenance of services to buildings, buildings and recreational land, prior to the Applicant and the organization owned by the Applicant, NSA Developments CC, trading as Interveners Management Consultants, CK Number 1995/041792/23, had delivered emergency safety and maintenance services to the Seventh Respondent;

(d) section 37(1)(b) of the Sectional Titles Act of 95 of 1986 in not having raised a special levy to remunerate the Applicant or his organisation, NSA Developments CC, CK Number 1995/041792/23;

(e) section 37(1)(j)(o)(r) of the Sectional Titles Act of 95 of 1986 in having neglected to maintain their common property or to keep it in a state of good and serviceable repair, prior to the Applicant and the organization owned by the Applicant, NSA Developments CC, trading as Interveners Management Consultants, CK Number 1995/041792/23, had delivered emergency safety and maintenance services to the Seventh Respondent;

(f) section 38(d) of the Sectional Titles Act of 95 of 1986 in not having maintained their recreational facility and having failed to maintain their gardens, from having sealed all outside taps to result in the no watering of their gardens after an untrained person had removed all flowers which had been planted after the Applicant and his organisation, NSA Developments CC, CK Number 1995/041792/23, had developed their recreational facility and gardens;

(g) section 38(e) of the Sectional Titles Act of 95 of 1986 in not having borrowed money to remunerate the Applicant or his organisation, NSA Developments CC, CK Number 1995/041792/23, for having delivered emergency safety and maintenance services to the Seventh Respondent;

(h) section 38(j) of the Sectional Titles Act of 95 of 1986 in not having enforced their House Rules for several years in having allowed the owner of unit number 5, Ms Katharina Benade to provide services to men;

(i) section 40 (1)(2)(a)(b) of the Sectional titles Act of 95 of 1986 in having failed to take action against all trustees whom had failed to act honestly and in good faith, in particular:

(i) Mr Duncan Smith in his fraudulent mismanaged as chairman and secretary, whom had fraudulently gained a monthly economic benefit in having fraudulently negotiating to have trees pruned adjacent to the common border wall with the neighbouring complex, La-Bri, to postpone the rebuild of the common border wall and to remove the trees which had caused damages to the common border wall after which Mr Duncan Smith had fraudulently misrepresented and had not noted the verbal agreements between the Seventh Respondent and the Applicant, that the Applicant or his organization, NSA Developments CC, CK Number 1995/041792/23, would be remunerated by the Seventh Respondent by the time the Seventh Respondent have financially recovered;

(ii) Mr Derik Grobler, under whose chairmanship, the Applicant was removed as chairman, to result in the Applicant being subjected to a 13 (thirteen) year witch hunt from the conspiring by the Seventh Respondent with the Second, Third, Fourth and Fifth Respondents;

(iii) Mr Wessel J Van Wyk, under whose chairmanship various contraventions had taken place, in particular that:

(aa) the owner of residential unit number 5, Ms Katharina Benade had been allowed to provide various services to men;

(bb) building regulations had been breached after which the attempt had been made by the Seventh Respondent to fraudulently bypass building regulations, in contravention of section 24 of the Sectional Titles Act 95 of 1986;

(cc) legal actions against the Applicant had intensified during which Mr Wessel J Van Wyk had made mention of their conspiring with the Second Respondent;

(dd) *crimen injuria* and the defamation of the character of the Applicant by Mr Wessel J Van Wyk had occurred during their Annual General Meeting in JANUARY 2020;

(ee) the resignation of the full board of trustees had resulted in the unlawful appointment of law firm, Riaan Oosthuysen Attorneys, trading as OPROPSA Attorneys in an attempt to conceal their fraud and to evade remunerating the Applicant or the organization owned by the Applicant, NSA Developments CC, trading as Interveners Management Consultants, CK Number 1995/041792/23;

(iv) Riaan Oosthuysen Attorneys Incorporated, trading as OPROPSA Attorneys, whom had been appointed as Executive Managing Agent by the Seventh Respondent, in the fraudulent attempts by the Seventh Respondent to evade their obligation to remunerate the Applicant or his organization for having delivered emergency safety and maintenance services, with Riaan Oosthuysen Attorneys Incorporated, trading as OPROPSA Attorneys whom is not being in possession of a Property Practitioner Certificate to act as an Executive Managing Agent and whom:

(aa) had failed to adhere to the request by the Applicant to investigate the fraud and mismanagement by the Seventh Respondent to have led to the continuation of the witch hunt against the Applicant by the Seventh Respondent;

(bb) had intensified the witch hunt against the Applicant during which the misused of the services of the First Respondent had occurred several times;

(cc) had neglected the maintenance of the main entrance gate motor for more than 3 (three) months during the period between 16 JULY 2022 to 3 OCTOBER 2022, concurrently with the failure to fit solar lighting at the unit of the Applicant, resulting in a burglary between 25 and 26 SEPTEMBER 2022 at the unit of the Applicant;

(j) section 9 of The Constitution of the Republic of South Africa Act 108 of 1996, in preventing the Applicant to receive equal protection and benefit of the law from the conspiring by the Seventh Respondent with the Second, Third, Fourth and Fifth Respondents whom had subjected the Applicant to a witch hunt with the purpose to evade their obligation to remunerate the Applicant or NSA Developments CC, CK Number 1995/041792/23, resulting in the lessening of the ability of the Applicant to generate income to meet his obligation to pay his sectional title levies towards the Seventh Respondent;

(k) section 269A(b) of the Criminal Procedure Act 51 of 1977 in having committed fraud in their failure to rectify the fraudulent trustee meeting minutes noted by Mr Duncan Smith, as mentioned in the preceding paragraph 14(i)ss(i), to enable the Seventh Respondent fabricate the commencement date of the statutory claim period under the Prescription Act 63 of 1969, in their fraudulent attempts to evade remunerating the Applicant or his organization, NSA Developments CC, CK Number 1995/041792/23, for having delivered emergency safety and maintenance services to the Seventh Respondent;

(l) section 12(2)(3) of the Prescription Act 63 of 1969 in having wilfully prevented the Applicant to bare knowledge of the existence of the debt owned by the Seventh Respondent to the Applicant and his organisation NSA Developments CC, CK Number 1995/041792/23;

(m) section 269A(b) of the Criminal Procedure Act 51 of 1977 in them having fraudulently appointed, Mr Reynault Meintjes, from Rorich Wolmarans Luderitz Incorporated, in OCTOBER 2010, with the purpose to subject the Applicant to a witch hunt during which the services of the Sheriff had been misused several times to evade their obligation to remunerate the Applicant or his organization NSA Developments CC, CK Number 1995/041792/23,;

(n) section 40(1) of the Sectional Titles Act 95 of 1986 in their mismanagement of the trust funds of the Seventh Respondent in having performed various unnecessary maintenance with the purpose to conceal maintenance done by the Applicant and his organisation NSA Developments CC, CK Number 1995/041792/23;

(o) section 49 of the Criminal Procedure Act 51 of 2003 in that owner Ms Marie Bosman, had ended the life of a fleeing intruder with a gunshot to the back whom had not threatened or had held a threat to Ms Marie Bosman.

15. Declaring that the fraudulent attempts by the Seventh Respondent to evade their obligation to remunerate the Applicant or his organization, NSA Developments CC, CK Number 1995/041792/23, for having delivered emergency safety and maintenance services, had fraudulently appointed legal representatives whom had breached:

(a) rule 40.1; rule 40.2; rule 40.2.2 of the Rules for the Attorney's Profession in having failed to maintain the highest standards of honesty and integrity and to treat the interests of the Applicant as paramount and the interests of justice, in having fraudulently attempted to protect the Seventh Respondent whom had fraudulently been evading their obligation to remunerate the Applicant or his organization, NSA Developments CC, CK Number 1995/041792/23 and to subject the Applicant to a witch hunt;

(b) rule 40.4 of the Rules for the Attorney's Profession in having failed to refrain from doing anything in a manner prohibited by law or by the code of conduct of the profession resulting in them having placed their interests and of other clients in conflict with that of the Applicant in them having fraudulently protecting the Seventh Respondent whom had fraudulently been evading their obligation to remunerate the Applicant or his organization, NSA Developments CC, CK Number 1995/041792/23 and to subject the Applicant to a witch hunt;

(c) rule 40.14 of the Rules for the Attorney's Profession in them having brought the attorney's profession in disrepute in them having fraudulently protecting the Seventh Respondent whom had fraudulently been evading their obligation to remunerate the Applicant or his organization, NSA Developments CC, CK Number 1995/041792/23 and to subject the Applicant to a witch hunt.

16. Ordering that a ***curator ad litem*** be appointed for the Seventh Respondent in terms of section 42(12) from the contravention of section 41(1)(b) of the Sectional Titles Act 95 of 1986 by the Seventh Respondent whom had performed various fraudulent actions to avoid to institute proceedings to remunerate the Applicant or NSA Developments CC, CK Number 1995/041792/23, upon the numerous requests by the Applicant, after which the full board of trustees of the Seventh Respondent had resigned and had appointed Riaan Oosthuysen Attorneys Incorporated, trading as OPROPSA Attorneys, as Executive Managing Agent, whom had also failed their obligation to institute proceedings to remunerate the Applicant or NSA Developments CC, CK Number 1995/041792/23.

17. Declaring that the Eighth Respondent had breached section 2(c) of the Community Schemes Ombud Services Act 9 of 2011 from their failure to adjudicate the dispute between the Seventh Respondent and the Applicant and his organization, NSA Developments CC, CK Number 1995/041792/23, after a senior officer of the Eighth Respondent had confirmed in JANUARY 2020, that the Applicant and his organization have a legitimate claim against the Seventh Respondent, upon which the Applicant had prepared and delivered a 260 (two hundred and sixty) page detailed claim report on 4 MARCH 2020, to the offices of the Eighth Respondent.

18. Declaring that the conspiring by the Second, Third, Fourth, Fifth and Seventh Respondents had led to conspire with the Ninth, Tenth and Eleventh Respondents on or about 2013, in breach of:

(a) section 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 during the time that the Applicant had stepped up to protect his ageing missionary parents against the Ninth, Tenth and Eleventh Respondents, as trustees of the International Islands Mission, the mission the father of the Applicant had established and operated since 1971;

(b) section 1(a) of the Intimidation Act 72 of 1982, in the intimidation of the Twelfth Respondent to have resulted in the withdrawal of the extension of the deadline the Twelfth Respondent had given the Applicant to write 2 (two) exams and to complete a workshop and consequently in the suspension of the financial license of the Applicant for more than 10 (ten) months, from AUGUST 2014 until APRIL 2015, debilitating the Applicant to generate income to meet his obligations towards the Second, Third and Seventh and Twelfth Respondents and consequently had led to the death of the elderly parents of the Applicant, 10 (ten) days apart under questionable circumstances from the financial inability of the Applicant to protect his elderly parents against the Ninth, Tenth and Eleventh Respondents.

19. Declaring that the Ninth Respondent as secretary of the International Island Mission had contravened:

(a) section 1(b) of the Intimidation Act 72 of 1982 and section 269A(c) of the Criminal Procedure Act 51 of 1977 in having intimidated the Applicant in having verbalized that the Applicant would be fraudulently arrested in the event of the Applicant would insist to be furnished with the financial statements of the International Islands Mission, after the resignation by the full board of trustees of the International Islands Mission and the appointment of the Applicant to manage the financial affairs of his elderly parents and after the International Island Mission had fraudulently been dissolved;

(b) section 269A(b) of the Criminal Procedure Act 51 of 1977 in his mismanagement of missionary funds of the International Islands Mission in that the Tenth and Eleventh Respondents had fraudulently obtained funds and the medical aid of the elderly parents of the Applicant had been cancelled, prior to the attempt by the Ninth, Tenth and Eleventh Respondents to have the elderly missionary couple taken in by an unregistered Dementia and Alzheimer facility;

(c) section 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 in having conspired with the Tenth and Eleventh Respondents to have the elderly missionary couple taken in by an unregistered Dementia and Alzheimer facility without the elderly missionary couple being diagnosed to suffer from Dementia and Alzheimer disease;

(d) section 4(1)(a) ss(i)(ii)(iii)(iv) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 in having accepted, as trustee, a donation of R80 000.00 (eighty thousand rand), during 1998, made by the Fourteenth Respondent to the International Island Mission, resulting in the withdrawal of the support the father of the Applicant had given the Applicant during his child custody application in 1998;

(e) section 34(1)(a) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 in the failure by the Ninth Respondent to have reported baring knowledge of the donation of R80 000.00 (eighty thousand rand), during 1998, made by the Fourteenth Respondent to the International Island Mission, resulting in the withdrawal of the support the father of the Applicant had given the Applicant during his child custody application in 1998;

(f) section 34(1)(a) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 in the failure by the Ninth Respondent to have reported baring knowledge of the Eleventh Respondent having received unauthorized funds for over 2 (two) years from the International Island Mission, donated by NG Suider Strand Church and ordained for missionary work in Indonesia;

(g) section 30(1)(2)(3)(c)(iii)(d)ss(ii) of the Older Persons Act 13 of 2006 from his fraudulent attempt to ‘dump’ the elderly parents of the Applicant in an unregistered Dementia and Alzheimer facility without them being diagnosed to suffer from such conditions to cause their humiliation, distress, distrust and loss of freedom after the attempts by the Ninth Respondent, as trustee, to take over the donators of the International Island Mission without having followed the correct procedures to retire the elderly missionary couple from the International Island Mission funding, resulting in the financial ruin of the elderly parents of the Applicant.

20. Declaring that the Tenth Respondent as treasurer of the International Island Mission had breached:

(a) section 269A(b) of the Criminal Procedure Act 51 of 1977 from his mismanagement of missionary funds, in having fraudulently received funds as treasurer of the International Island Mission and in having cancelled the medical aid of his elderly parents prior to his attempt have his elderly parents taken in by an unregistered Dementia and Alzheimer facility without his elderly parents being diagnosed to suffer from Dementia and Alzheimer disease;

(b) section 21(b) in having conspired with his spouse, Ms Lorraine Botha and the Ninth and Eleventh Respondents to have his elderly parents taken in by an unregistered Dementia and Alzheimer facility without his elderly parents being diagnosed to suffer from Dementia and Alzheimer disease;

(c) section 30(1)(2)(3)(c)(iii)(d)ss(ii) of the Older Persons Act 13 of 2006 from his fraudulent attempt to have his elderly parents taken in by an unregistered Dementia and Alzheimer facility without his elderly parents being being diagnosed to suffer from Dementia and Alzheimer disease, causing their humiliation, distress, distrust and loss of freedom, with the intention to reside in the sectional title unit of his elderly parents, after the Tenth Respondent had exploited the International Island Mission financially and in having failed to follow the correct procedures, as trustee, to retire his elderly parents from the International Island Mission funding, to result in the financial ruin of his elderly parents;

(d) section 30(3)(d)(iii) of the Older Persons Act 13 of 2006 in having fraudulently and unlawfully, sold the pottery oven and wheel as hobby tools of his mother for his own personal gain.

21. Declaring that the Eleventh Respondent as chairperson of the International Island Mission had breached:

(a) section 269A(b) of the Criminal Procedure Act 51 of 1977 in having received unauthorized funds for over 2 (two) years from the International Island Mission, donated by NG Suider Strand Church and ordained for missionary work in Indonesia;

(b) in his mismanagement of the missionary funds of the International Islands Mission in that the Tenth Respondent had fraudulently obtained funds and the medical aid of the elderly parents of the Applicant had been cancelled, prior to the attempt by the Ninth, Tenth and Eleventh Respondents to have the elderly missionary couple taken in by an unregistered Dementia and Alzheimer facility;

(c) section 4(1)(a) ss(i)(ii)(iii)(iv) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 in having accepted, as trustee, a donation of R80 000.00 (eighty thousand rand) during 1998, made by the Fourteenth Respondent to the International Island Mission, resulting in the withdrawal of the support the father of the Applicant had given the Applicant during his child custody application in 1998;

(d) section 34(1)(a) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 in the failure by the Eleventh Respondent to have reported baring knowledge of the donation of R80 000.00 (eighty thousand rand) during 1998, made by the Fourteenth Respondent to the International Island Mission, resulting in the withdrawal of the support the father of the Applicant had given the Applicant during his child custody application in 1998;

(e) section 1(1)(a) of the Intimidation Act 72 of 1982 in having warned the Applicant in or about 2013, not to investigate the fraudulent intent behind the donation to the International Island Mission by the Thirteenth Respondent on behalf of the Fourteenth Respondent for the withdrawal of the support the father of the Applicant had been giving the Applicant during the child custody application of the Applicant in 1998;

(f) section 21(b) in having conspired with the Tenth and Eleventh Respondents to have the elderly missionary couple taken in by an unregistered Dementia and Alzheimer facility without the elderly missionary couple being diagnosed to suffer from Dementia and Alzheimer disease;

(g) section 30(1)(2)(3)(c)(iii)(d)ss(ii) of the Older Persons Act 13 of 2006 in his fraudulent attempt to have the elderly missionary couple taken in by an unregistered Dementia and Alzheimer facility without the elderly missionary couple being diagnosed to suffer from Dementia and Alzheimer disease, causing their humiliation, distress, distrust and loss of freedom, after the Eleventh Respondent had exploited the International Island Mission financially and had failed to follow the correct procedures, as trustee, to retire the elderly missionary couple from the International Island Mission funding, contributing to the financial ruin of the elderly parents of the Applicant.

22. Declaring that the Twelfth Respondent whom holds a position of authority had breached section 34(1)(a) of the Prevention and Combating of Corrupt Activities Act 12 of 2004, in their failure to have reported knowing that the person(s) whom had induced or intimidated the Twelfth Respondent had breached section 21(c) of the Prevention and Combating of Corrupt Activities Act 12 of 2004, to result in the Twelfth Respondent to withdraw the extension of the deadline the Twelfth Respondent had given the Applicant to write 2 (two) exams and to complete a workshop and consequently in the suspension of the financial license of the Applicant for more than 10 (ten) months, from AUGUST 2014 until APRIL 2015, debilitating the Applicant to generate income to meet his obligations towards the Second, Third and Seventh and Twelfth Respondents and consequently had led to the death of the elderly parents of the Applicant, 10 (ten) days apart under questionable circumstances from the financial inability of the Applicant to protect his elderly parents against the Ninth, Tenth and Eleventh Respondents.

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23. Declaring that section 18 of the Criminal Procedure Act 51 of 1977 is invalid and unconstitutional in so far that the right to institute prosecution for any offence lapse after the expiration of a period of 20 (twenty) years from the time when the offence was committed, in the event that the person(s) whom had committed an offence had conspired with the purpose to conceal the offence or had intimidated system officials or any other person(s) to prevent their prosecution during the statuary claim period with the purpose to be acquitted after the period of 20 (twenty) years.

24. Declaring that the Thirteenth Respondent had breached:

(a) section 6(2)(a)(b)(c)(d)(e) of the Children's Act 38 of 2005 in having concluded the marriage between the child abuser, Mr Henk Janse van Vuuren and the Sixteenth Respondent to result in the immediate removal of the 2 (two) minor children of the Applicant from the custody of Mr Henk Janse van Vuuren and the Sixteenth Respondent;

(b) section 4(1)(b) ss(i)(ii)(iii)(iv) of the Prevention and Combating of Corrupt Activities Act 12 of 2004, as Reverend of the Fourteenth Respondent, in having donated on behalf of the Fourteenth

Respondent the amount of R80 000.00 (eighty thousand rand) to the International Island Mission for the withdrawal of the support the father of the Applicant had given the Applicant during his child custody application in 1998, after the Thirteenth Respondent had concluded the marriage between the child abuser and the Sixteenth Respondent, to consequently have led to the 2 (two) minor children of the Applicant being forced in the custody of the child abuser, Mr Henk Janse van Vuuren and the Sixteenth Respondent.

25. Declaring that the Fourteenth Respondent had breached:

(a) section 6(2)(a)(b)(c)(d)(e) of the Children's Act 38 of 2005 in having facilitated the marriage between the child abuser and the Sixteenth Respondent, to consequently have led to the 2 (two) minor children of the Applicant being forced in the custody of the child abuser, Mr Henk Janse van Vuuren and the Sixteenth Respondent;

(b) section 4(1)(b) ss(i)(ii)(iii)(iv) of the Prevention and Combating of Corrupt Activities Act 12 of 2004, in having authorised the donation of R80 000.00 (eighty thousand rand) to the International Island Mission for the withdrawal of the support the father of the Applicant had given the Applicant during his child custody application in 1998, after the Thirteenth Respondent had concluded the marriage between the child abuser and the Sixteenth Respondent, to consequently have led to the 2 (two) minor children of the Applicant being forced in the custody of the child abuser, Mr Henk Janse van Vuuren and the Sixteenth Respondent.

26. Declaring that the Fifteenth Respondent had breached:

(a) section 34(1)(a) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 for not having investigated the fraudulent donation made by the Fourteenth Respondent, in view of the Fourteenth Respondent not having been authorized to enter into an association with the International Island Mission as required by the Church Rules, after having been informed thereof by the Applicant on 11 FEBRUARY 2014;

(b) section 34(1)(a) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 in not having investigated the Eleventh Respondent in having fraudulently received unauthorized funds for over 2 (two) years from the International Island Mission, donated by NG Suider Strand Church and ordained for missionary work in Indonesia.

27. Declaring that the Sixteenth Respondent, whom lack empathy and suffer from neuropsychiatric disorders, had breached:

(a) section 6(2)(a)(b)(c)(e) of the Children's Act 38 of 2005 in not having respected the inherent dignity, not having protected, not having treated the 2 (two) minor children of the Applicant fairly and equitably, not having recognised the need of the 2 (two) minor children of the Applicant to engage in recreational activities and having exposed the 2 (two) minor children to a child abuser, to result in their verbal and physical abuse and having alienated the 2 (two) minor children from the Applicant since the divorce and child custody applications by the Applicant in JUNE 1995;

(b) section 6(4)(a)(b) of the Children's Act 38 of 2005 in her inability to comprehend any form of conflict solving or to take precautionary actions and in having constantly causing confrontational situations;

(c) section 7(1)(a)(i) of the Children's Act 38 of 2005 in her constant attempts to alienate the 2 (two) minor children of the Applicant from the Applicant;

(d) section 7(1)(c) of the Children's Act 38 of 2005 in her mental incapacity to provide for the needs of the 2 (two) minor children of the Applicant, including emotional and intellectual needs;

(e) section 7(1)(d)(i) of the Children's Act 38 of 2005 in her mental incapacity to comprehend the role that a father plays in child development in her constant attempts to alienate all 4 (four) children from the Applicant and in having alienated her 2 (two) children from her previous marriage from their father as well as from the Applicant whom had 'played' father for 11 (eleven) years in their lives;

(f) section 7(1)(d)(ii) of the Children's Act 38 of 2005 in having divided the 4 (four) children since her marriage with the child abuser, upon which her 2 (two) children from her previous marriage, then ages 13 (thirteen) and 16 (sixteen), had refused to stay with the Sixteenth Respondent;

(g) section 7(1)(e) of the Children's Act 38 of 2005 in having prohibited regular contact between the 2 (two) minor children of the Applicant and the Applicant, in having relocated in SEPTEMBER 1997, in contempt of a High Court order, together with the child abuser and the 2 (two) minor children of the Applicant, to the Eastern Cape Province from Pretoria where the Applicant resides;

(h) section 7(1)(f)(ii) of the Children's Act 38 of 2005 in her mental incapacity to comprehend the need of the 2 (two) minor children of the Applicant to maintain connection with the Applicant as father, in having relocated in SEPTEMBER 1997, in contempt of a High Court order, together with the child abuser and the 2 (two) minor children of the Applicant, to the Eastern Cape Province from Pretoria where the Applicant resides;

(i) section 7(1)(g)(i) of the Children's Act 38 of 2005 in her mental incapacity to have comprehended the effect of her and the child abuser's irrational and harming actions towards the 2 (two) minor children of the Applicant, being respectively 2 (two) and 7 (seven) years of age in 1995;

(j) section 7(1)(h) of the Children's Act 38 of 2005 in her mental incapacity to have comprehended the effect of her and the child abuser's irrational and harming actions towards the 2 (two) minor children's physical and emotional security and their intellectual, emotional, social and cultural development;

(k) section 7(1)(k) of the Children's Act 38 of 2005 in her mental incapacity to have comprehended the need of a child to be brought up within a stable family environment in contrast with her and the child abuser's irrational and harming actions;

(l) section 7(1)(l)(i) of the Children's Act 38 of 2005 in her mental incapacity to have comprehended the need to protect the 2 (two) minor children of the Applicant from physical and psychological harm, in having subjecting the children to maltreatment, abuse, degradation and having exposed the children to violence and the harmful behaviour of herself and the child abuser;

(m) section 7(1)(m) of the Children's Act 38 of 2005 in having exposed the 2 (two) minor children of the Applicant to the violent behaviour of the child abuser;

(n) section 7(1)(n) of the Children's Act 38 of 2005 in having intensified fraudulent legal proceedings against the Applicant to have the Applicant falsely arrested and to have his movable property attached with a warrant of execution after the Applicant had notified the Sixteenth Respondent that the Applicant had applied for child custody over his 2 (two) minor children;

(o) section 9 of the Children's Act 38 of 2005 caused by her neuropsychiatric disorder as manifested by her deficient emotional responses, lack of empathy and poor behavioural control in having put her own interests first and failing to comprehend that what is in the best interest of a child;

(p) section 10 of the Children's Act 38 of 2005 in having opposing the Applicant to have his children participate in extra curriculum activities;

(q) section 35(1) of the Children's Act 38 of 2005 in often having refused the Applicant to have access to his children;

(r) section 28(1)(b)(d)(2) of the Constitution Act 108 of 1996 caused by her neuropsychiatric disorder as manifested by her deficient emotional responses, lack of empathy and poor behavioural control in having put her own interests first and failing to comprehend that what is in the best interest of a child.

28. Declaring that the Seventeenth Respondent had breached:

(a) section of 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 in having conspiring with the Eighteenth Respondent to promote the irrational maintenance claims by the Sixteenth Respondent and not to have respected, protected or promoted the rights of the 2 (two) minor children of the Applicant;

(b) section 6(2)(a)(b)(c)(e) of the Children's Act 38 of 2005 in having conspired with the Eighteenth Respondent to conceal the child abuse of the 2 (two) minor children of the Applicant and to contribute to the alienation of the 2 (two) minor children of the Applicant from the Applicant;

(c) section of 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 in having conspiring with the Twentieth Respondent to conceal the malpractices by the Seventeenth and Eighteenth Respondents;

(d) section of 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 in having conspired with the Sixth Respondent after being reported to the Sixth Respondent by the Applicant to prevent his prosecution on 16 SEPTEMBER 1997 and on 11 SEPTEMBER 2014;

(e) section 6(2)(a)(b)(c)(e) of the Children's Act 38 of 2005 in him not having respected, protected or promoted the rights of the 2 (two) minor children of the Applicant;

(f) section 6(4)(a)(b) of the Children's Act 38 of 2005 in him having conducted fraudulent litigation to inflict conflict and not having taken precautionary actions to avoid confrontational situations in his institutions of fraudulent legal actions against the Applicant;

(g) section 8(2) of the Children's Act 38 of 2005 in him as an official of a state organ not having respected, protected or promoted the rights of the 2 (two) minor children of the Applicant;

(h) section 9 of the Children's Act 38 of 2005 and section 28(1)(b)(d)(2) of the Constitution Act 108 of 1996 in him not having acted in the best interest of the 2 (two) minor children of the Applicant;

(i) rule 40.4 of the Rules for the Attorney's Profession in having mal practiced and had failed to refrain from doing anything in a manner prohibited by law or by the code of conduct of the profession resulting in having placed his own interests and the interests of the Sixteenth Respondent in conflict with the interests of the 2 (two) minor children of the Applicant;

(j) rule 40.14 of the Rules for the Attorney's Profession in having mal practiced which had consequently brought the attorney's profession in disrepute.

29. Declaring that the Eighteenth Respondent had breached:

(a) section of 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 in having conspiring with the Seventeenth Respondent to promote the irrational maintenance claims by the Sixteenth Respondent and not having respected, protected or promoted the rights of the 2 (two) minor children of the Applicant;

(b) section 6(2)(a)(b)(c)(e) of the Children's Act 38 of 2005 in having conspired with the Seventeenth Respondent to conceal the child abuse of the 2 (two) minor children of the Applicant and to contribute to the alienation of the 2 (two) minor children of the Applicant from the Applicant;

(g) section of 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 in having conspiring with the Twentieth Respondent to conceal the malpractices by the Seventeenth and Eighteenth Respondents;

(d) section 6(2)(a)(b)(c)(e) of the Children's Act 38 of 2005 in not having respected, protected or promoted the rights of the 2 (two) minor children of the Applicant;

(e) section 6(4)(a)(b) of the Children's Act 38 of 2005 in not having taken precautionary actions to avoid confrontational situations in having concealed the child abuse of the 2 (two) minor children of the Applicant;

(f) section 8(2) of the Children's Act 38 of 2005 in her as an official of a state organ not having respected, protected or promoted the rights of the 2 (two) minor children of the Applicant;

(g) section 9 of the Children's Act 38 of 2005 and section 28(1)(b)(d)(2) of the Constitution Act 108 of 1996 in her not having acted in the best interest of the 2 (two) minor children of the Applicant.

30. Declaring that the Nineteenth Respondent had breached:

(a) section of 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 in having conspiring with the Seventeenth and Eighteenth Respondents to conceal their malpractices and to replace the Seventeenth Respondent after his withdrawal from the divorce law suit between the Sixteenth Respondent and the Applicant;

(b) section 6(2)(a)(b)(c)(e) of the Children's Act 38 of 2005 in her not having respected, protected or promoted the rights of the 2 (two) minor children of the Applicant and had contributed to the alienation of the 2 (two) minor children from the Applicant;

(c) section 6(2)(a)(b)(c)(e) of the Children's Act 38 of 2005 in her contempt of 2 (two) High Court orders, in SEPTEMBER 1997, by Honourable Justice Botha, which had ordered the Nineteenth Respondent to report any contact between the child abuser, Mr Henk Janse Van Vuuren and the 2 (two) minor children of the Applicant;

(d) section 6(4)(a)(b) of the Children's Act 38 of 2005 in her having orchestrated fraudulent legal actions to inflict conflict and not having taken precautionary actions to avoid confrontational situations between the Sixteenth Respondent and the Applicant;

(e) section 8(2) of the Children's Act 38 of 2005 in her as an official of a state organ not having respected, protected or promoted the rights of 2 (two) minor children of the Applicant;

(f) section 9 of the Children's Act 38 of 2005 and section 28(1)(b)(d)(2) of the Constitution Act 108 of 1996 in her not having acted in the best interest of 2 (two) minor children of the Applicant.

31. Declaring that the Twentieth Respondent had breached:

(a) section of 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 in having conspiring with the Seventeenth and Eighteenth Respondents to promote the irrational maintenance claims by the Sixteenth Respondent and not to have respected, protected or promoted the rights of 2 (two) minor children of the Applicant and to have contributed to the alienation of 2 (two) minor children of the Applicant from the Applicant;

(b) section 6(2)(a)(b)(c)(e) of the Children's Act 38 of 2005 in him not having respected, protected or promoted the rights of the 2 (two) minor children of the Applicant;

(c) section of 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 in having conspiring with the Seventeenth and Eighteenth Respondents to conceal their malpractices and withdrawal from the divorce law suit between the Sixteenth Respondent and the Applicant, in having contacted the Applicant directly without being instructed by an attorney to request the Applicant not to report the malpractices by the Seventeenth and Eighteenth Respondents and to ensure the acceptance of the divorce settlement offer by the Sixteenth Respondent;

(d) section of 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 in having conspiring with the Twenty-fifth and Twenty-sixth Respondents to conceal his malpractices, after having been reported by the Applicant;

(e) section of 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 in having conspiring with the Twenty-first and Twenty-third Respondent to conceal the child abuse by the Sixteenth Respondent and the child abuser, Mr Henk J Van Vuuren;

(f) section 6(4)(a)(b) of the Children's Act 38 of 2005 in him having consulted directly with the Sixteenth Respondent without being instructed an attorney, prior to the Legal Practice Act 28 of 2014 had come into effect, with the purpose to orchestrate fraudulent legal actions against the applicant and to inflict conflict and not to have taken precautionary actions to avoid confrontational situations between the Sixteenth Respondent and the Applicant;

(g) section 8(2) of the Children's Act 38 of 2005 in him as an official of a state organ not having respected, protected or promoted the rights of the 2 (two) minor children of the Applicant;

(h) section 9 of the Children's Act 38 of 2005 and section 28(1)(b)(d)(2) of the Constitution Act 108 of 1996 in him not having acted in the best interest of the 2 (two) minor children of the Applicant;

(i) section 21(b) the Prevention and Combating of Corrupt Activities Act 12 of 2004 in having conspired with the South African Police Services on or about JULY 1997 to prevent the prosecution of the child abuser, Mr Henk Jansen Van Vuuren;

(j) section 21(b) the Prevention and Combating of Corrupt Activities Act 12 of 2004 in having conspired with the Sixteenth Respondent and the South African Police Services on 22 NOVEMBER 1997 to prevent the Applicant to receive the 2 (two) minor children after the Applicant had obtained a High Court order providing custody of the 2 (two) minor children to the Applicant;

(k) section 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 in having conspired to prevent Justice Swart to open proceeding for the hearing of the urgent Notice of Motion application by the Applicant on 10 DECEMBER 1998;

(l) section 21(b) the Prevention and Combating of Corrupt Activities Act 12 of 2004 in having conspired with the clerk of the High Court on 10 DECEMBER 1998, to attempt to deceive the Applicant to leave the court room, by saying to the Applicant that the application brought by the Applicant would not be heard that same day, after Honourable Justice Swart had not indicated that the application would stand over to the following day.

32. Declaring that the Twenty-first Respondent had breached:

(a) section of 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 in having conspiring with the Seventeenth and Eighteenth Respondent to promote the irrational maintenance claims by the Sixteenth Respondent and not to have respected, protected or promoted the rights of the children and to contribute to the alienation of the 2 (two) minor children of the Applicant;

(b) section 6(2)(a)(b)(c)(e) of the Children's Act 38 of 2005 in her not having respected, protected or promoted the rights of the 2 (two) minor children of the Applicant;

(c) section of 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 in having conspiring with the Twentieth Respondent to conceal the malpractices by the Seventeenth and Eighteenth Respondents;

(d) section of 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 in having conspiring with the Twenty-second Respondent to prevent her prosecution, after being reported by the Applicant for her contempt of 2 (two) High Court orders in SEPTEMBER 1997 and her compiling of fraudulent child reports on the 2 (two) minor children of the Applicant;

(e) section of 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 in having conspiring with the Twenty-third Respondent, after being reported by the Applicant for her contempt of 2 (two) High Court orders in SEPTEMBER 1997 and her compiling of fraudulent child reports;

(f) section 6(4)(a)(b) of the Children's Act 38 of 2005 in her having compiled fraudulent child reports to inflict conflict and not having taken precautionary actions to avoid confrontational situations between the Sixteenth Respondent and the Applicant;

(g) section 8(2) of the Children's Act 38 of 2005 in her as an official of a state organ not having respected, protected or promoted the rights of the 2 (two) minor children of the Applicant;

(h) section 9 of the Children's Act 38 of 2005 and section 28(1)(b)(d)(2) of the Constitution Act 108 of 1996 in her not having acted in the best interest of the 2 (two) minor children of the Applicant;

(i) section 6(2)(a)(b)(c)(d)(e) of the Children's Act 38 of 2005 in her failure to have reported the Sixteenth Respondent for her contempt of the 2 (two) High Courts SEPTEMBER 1997, by Honourable Justice Botha, prohibiting contact between the child abuser, Mr Henk J Van Vuuren and the 2 (two) minor children of the Applicant;

(j) section 6(2)(a)(b)(c)(d)(e) of the Children's Act 38 of 2005 in her having compiled a fraudulent child report resulting in the removal of the 2 (two) minor children of the Applicant from the custody from the Applicant on 21 JANUARY 1998;

(k) section 6(2)(a)(b)(c)(d)(e) of the Children's Act 38 of 2005 from her failure to have reported the conclusion of the marriage between the child abuser, Mr Henk J Van Vuuren and the

Sixteenth Respondent, as ordered by 2 (two) High Court orders by Honourable Justice Botha in SEPTEMBER 1997;

(l) section 6(2)(a)(b)(c)(d)(e) of the Children's Act 38 of 2005 in her having compiled a fraudulent child report resulting in the removal of the minor children from the custody from the custody of the Sixteenth Respondent on 22 JUNE 1998;

(m) section 6(2)(a)(b)(c)(d)(e) of the Children's Act 38 of 2005 and section 28(1)(2) of the Constitution for having prevented the Applicant to have access to his children to enable them to engage in extracurricular activities from her attempt to alienate the 2 (two) minor children from the Applicant.

33. Declaring that the Twenty-second Respondent had breached:

(a) section 6(2)(a)(b)(c)(d)(e) of the Children's Act 38 of 2005 from their failure to have investigated and to have concealed the fraudulent conduct by the Twenty-first Respondent;

(b) section 8(2) of the Children's Act 38 of 2005 from them as a state organ not having respected, protected or promoted the rights of the 2 (two) minor children of the Applicant.

34. Declaring that the Twenty-third Respondent had breached:

(a) section 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of 2004 in having conspired with the Twentieth Respondent to place the 2 (two) minor children of the Applicant in the custody of the Sixteenth Respondent and the child abuser, Mr Henk Janse van Vuuren, after their marriage on 16 JUNE 1998, after having claimed that the child abuser had not been prosecuted;

(b) section 6(2)(a)(b)(c)(d)(e) of the Children's Act 38 of 2005 in having placed the 2 (two) minor children of the Applicant in the custody of the Sixteenth Respondent and the child abuser, Mr Henk Janse van Vuuren, 2 (two) months after the conclusion of the marriage which had been the cause for the removal of the 2 (two) minor children from the custody of the Sixteenth Respondent;

(c) section 1(1)(a) of the Intimidation Act 72 of 1982 in having threatened the Applicant to have his 2 (two) minor children placed in an orphanage in the event that the Applicant would seek for the prosecution of the child abuser, Mr Henk Janse van Vuuren.

35. Declaring that the Twenty-fourth Respondent had breached section 21(b) of the Prevention and Combating of Corrupt Activities Act 12 of

2004 in having conspired with the Twentieth Respondent not to investigate the fraudulent conduct by the Twenty-third Respondent in having intimidated the Applicant to prevent the prosecution of the child abuser, Mr Henk Janse van Vuuren, after which the Twenty-fourth Respondent had fraudulently claimed 4 (four) months later, to lack jurisdiction to investigate the fraudulent conduct by the Twenty-third Respondent.

36. Declaring that the Twenty-fifth Respondent had failed their obligation to investigate or prosecute the Twentieth Respondent after the Twentieth Respondent had been reported by the Applicant on 17 SEPTEMBER 1997 for conspiring and intimidation.

37. Declaring that the Twenty-sixth Respondent had failed their obligation to investigate or prosecute the Twentieth Respondent after the Twentieth Respondent had been reported by the Applicant on 11 FEBRUARY 2014 for conspiring and intimidation.

Order particular to this application

The Second Respondent

38. The Second Respondent is ordered to make records available of the alleged telecommunication to have taken place on 17 MARCH 2022

between the Applicant and the secretary Ms Lucinda Jones, at Vesi & De Beer Incorporated on record of the Second Respondent, as declared by Ms Lucinda Jones per Supplementary Affidavit and declared by Ms Nicolette Crous-Nel, the attorney at Vesi & De Beer incorporated, per Confirmatory Affidavit to the Default Judgement application on 5 APRIL 2022 and heard by the High Court on 08 SEPTEMBER 2023, which had enabled the Second Respondent to fraudulently obtain the sale in execution order over the residential property of the Applicant, known as Unit No 1, Wandel Park, 522 Alsatian Drive, Garsfontein Extension 8, Pretoria, as described in the preceding paragraph 2.1.

39. The Second Respondent is ordered to declare under oath, their reason for having reappointed Vesi & De Beer Incorporated as legal representative on record, on or about 2021, after having been being replaced by the Second Respondent with Van Hulsteyn Incorporated on or about SEPTEMBER 2017.

40. The Second Respondent is ordered to declare under oath, their reason for having withdrawn their legal representative, Vesi & De Beer Incorporated and having appointed Van Hulsteyn Incorporated on or about SEPTEMBER 2017.

41. The Second Respondent is ordered to make the fraudulent briefing report available which had been delivered to Van Hulsteyn Incorporated upon their appointment as legal representative by the Second Respondent, as described in the preceding paragraph 7(a), as the existence of the fraudulent briefing report had been made known to the Applicant by attorney Mr Daniel Raath, whom had claimed to have been created by a third party.

42. The Second Respondent is ordered to declare under oath, the reason for having delayed for 12 (twelve) months, to furnish the Applicant with the transcription of the voice recording made on the day of the first appointment between the Applicant and Mr Daniel Raath on 17 OCTOBER 2017, upon the request by the Applicant.

43. The Second Respondent is ordered to declare under oath the reasons for the confusion which had existed among the personnel in the Legal Department of the Second Respondent and the contradicting claims made by their legal representative on record, Vesi & De Beer Incorporated, resulting in them having fraudulently obtained a sale in execution order on or about APRIL 2016 over the residential property of the Applicant, as described in the preceding paragraph 2.1.

44. The Second Respondent is ordered to declare under oath the reasons for not having followed legal procedures to obtain the sale in execution order on or about APRIL 2016 over the immovable property of the Applicant, as described in the preceding paragraph 2.1, amidst the agreements reached between the Applicant and the internal personnel of the Second Respondent.

45. The Second Respondent is ordered to declare under oath the reasons for their Council to insist for court procedures to be opened after having been informed by Honourable Lady Justice Thlapi that although the Urgent Notice of Motion application on 23 MAY 2016, Case Number 51000, brought by the Applicant was technically flawed, the concern had been whether the Second Respondent would stand their ground considering the merits of the application.

46. The Second Respondent is ordered to declare under oath their reasons for having withdrawn the sale in execution order on 23 MAY 2016, after their legal representative on record had contacted the Applicant, at approximately 16h30 on 23 MAY 2016, to enquire whether the Applicant had still intended bringing a new corrected Urgent Notice of Motion application the same day.

47. The Second Respondent is ordered to declare under oath:

(a) the reason for having withdrawn their first legal representative on record, Haasbroek Boezaart Inc in 2009, to appoint of Vesi & De Beer Incorporated;

(b) the coincidence of the appearance of the signature of the Fifth Respondent, as Commissioner of Oath and director of the Fourth Respondent at the time, on the application by the Second Respondent and drafted by Vesi & De Beer Incorporated, during their fraudulent attempt to obtain a Default Judgement, Case Number 70861/2010, on 5 AUGUST 2011, against the Applicant, after the Fifth Respondent whom had been in breached of a loan agreement with the Applicant whom had been developing a National Property Database, after which the Fourth and the Fifth Respondents had unlawfully withheld and taken possession of the trust funds of the Applicant in the amount of R100 000.00 (one hundred thousand rand) on 30 OCTOBER 2006, payable to the Applicant from the proceeds of a bond extension granted by ABSA Bank Home loans to the Applicant.

48. The First Respondent is ordered to declare under oath the reasons for their self-admitted dilatory delivery of the sale in execution order to the Applicant in APRIL 2016.

The Third Respondent

49. The Third Respondent is ordered to declare under oath, the reason for not having investigated the fraudulent installation of three faulty electricity metering units, in 2010, 2011 and 2012, at residential unit of the Applicant at the premises of the Seventh Respondent.

The Fourth Respondent

50. The Fourth Respondent is ordered to declare under oath, the reason for having unlawfully withholding the amount of R100 000.00 (one hundred thousand rand) on 30 NOVEMBER 2006, payable to the Applicant without having received written consent from the Applicant.

The Sixth Respondent

51. The Sixth Respondent is ordered to declare under oath, the reasons for not having investigated the claims made by the Applicant against the Fourth and the Fifth Respondents on 11 DECEMBER 2019 and against the Seventeenth Respondent on 16 SEPTEMBER 1997 and against the Seventeenth and Nineteenth Respondents on 11 FEBRUARY 2014 and against Mr Reynault Meintjes on 26 NOVEMBER 2013.

The Seventh Respondent

52. The Seventh Respondent is ordered to declare under oath:

52.1 their failure to have investigated and rectified the fraudulent trustee minute made by their secretary and chairman, Mr Duncan Smith and to have fraudulently claimed that the claim by the organization of Applicant, NSA Developments CC, registration number 1995/41792/23, had prescribed 3 (three) years prior to the Combined Summons application, case number 35668/2013, brought by NSA Developments CC, registration number 1995/41792/23, against the Seventh Respondent on 8 JULY 2013, after NSA Developments CC, registration number 1995/41792/23, had delivered emergency security and maintenance services, after the fraudulent management by the Seventh Respondent had led to armed assault and the fatal wounding of an intruder, in contravention with Section 49 of the Criminal Procedure Act 51 of 2003;

52.2 their failure to have investigated Mr Duncan Smith in having fraudulently receiving monthly payments for over a period of a year from the Seventh Respondent;

52.3 their failure to have kept their common property, buildings and walls in a good state and serviceable repair;

52.4 their failure to have made provision to keep their common property, buildings and walls in a good state and serviceable repair;

52.5 their failure to have required the owners to make additional contributions to satisfy the claim by the organization of the Applicant, NSA Developments CC, registration number 1995/41792/23;

52.6 their failure to have installed a second water meter at the unit of the Applicant consecutively with the installation of the first water meter;

52.7 their failure to have installed a solar security light at the unit of the Applicant consecutively with the installation of the solar security lights at units number 2 (two) to 10 (ten), during the period of 3 (three) months, that they had neglected to repair and secure the main entrance to the premises of the Seventh Respondent, resulting in the burglary at the unit of the Applicant.

53. The Seventh Respondent is ordered to declare under oath the motive for their fraudulent conduct in having replaced the Applicant as chairperson of the Seventh Respondent in SEPTEMBER 2010**,** by Mr Derik Grobler, concurrently with the replacement of Pro Admin as managing agent by Rent Admin and concurrently with the appointment of Mr Reynault Meintjes from Rorich Wolmarans & Luderitz incorporate and to have subjected the Applicant to a witch hunt since NOVEMBER 2010 during which the misuse of the services of the First Respondent had been occurred several times, in view of their failure to have remunerated the organization of Applicant, NSA Developments CC, registration number 1995/41792/23, the amount of R500, 236, 00 (five hundred thousand two hundred and sixty three rand).

54. The Seventh Respondent is ordered to declare under oath:

54.1 their reason in having appointed Mr Riaan Oosthuysen Attorneys Incorporated, trading as OPROPSA Attorneys, as Executive Managing Agent, after their chairperson, Mr Wessel van Wyk, had committed defamation of character and crimen injuria against the Applicant;

54.2 their reason for their full board of trustees resigning on the same day, after which Mr Wessel van Wyk had sold his unit at the Seventh Respondent and had relocated;

54.3 their reason for not having taken legal action against Mr Wessel van Wyk in having committed defamation of character and crimen injuria against the Applicant;

55. The Seventh Respondent is ordered to declare under oath, the reason for the failure by their Executive Managing Agent, Mr Riaan Oosthuysen Attorneys Incorporated, trading as OPROPSA Attorneys, upon their appointment on 1 MAY 2020, to investigate the claims by the Applicant and his organization, NSA Developments CC, registration number 1995/41792/23.

The Eighth Respondent

56. The Eighth Respondent is ordered to declare under oath:

56.1 the reason in having failed their obligation to have entered into a dispute resolution and to investigate the request made by the Applicant, after having provided the Eighth Respondent, on 4 in MARCH 2020, a 260 (two hundred and sixty) page documented report, which had laid out the services provided by the Applicant and his organization, NSA Developments CC, registration number 1995/41792/23, to the Seventh Respondent;

56.2 in having claimed that the request made by the Applicant, as described in the preceding paragraph 56.1, had not fall under their jurisdiction.

The Ninth Respondent

57. The Ninth Respondent is ordered to declare under oath, his relationship with attorney Mr Steve Bester whom the Ninth Respondent had indicated had claimed that the Applicant had not been in possession of a valid financial license.

58. The Ninth Respondent is ordered to substantiate under oath, the statement made by him on 30 MAY 2017 at approximately 11h19, that the Financial Sector Conducting Authority had no reference of the whereabouts of the Applicant.

59. The Ninth Respondent is ordered to substantiate under oath, the circumstances which had led to the decision by the trustee board of the International Islands Mission to have the elderly parents of the

Applicant, be taken in by an unregistered Alzheimer and Dementia Facility in JANUARY 2013.

60. The Ninth Respondent is ordered to substantiate under oath, the accusation made by him on 30 MAY 2017 at approximately 11h19, that the Applicant had unlawfully took possession of donations made by NG Suider Strand Kerk to the International Islands Mission, during the involvement by the Applicant to protect his elderly parents against the elder abuse by the Ninth, tenth and Eleventh Respondents as trustees of the International Islands Mission.

61. The Ninth Respondent is ordered to declare under oath, having served as the secretary of the International Islands Mission, for not having reported to the Fifteenth Respondent, him having bared knowledge of the Eleventh Respondent to have for approximately two years, unlawfully receiving donations made by NG Suider Strand Church, prior to the involvement by the Applicant to protect his elderly parents.

62. The Ninth Respondent is ordered to declare under oath, his unwillingness to provide the Applicant with the financial statements of the International Islands Mission, after the resignation of the full board of trustees and the takeover by the Applicant, in his efforts to protect his ageing parents.

63. The Ninth Respondent is ordered to substantiate under oath, the utterance by him towards the brother of the Applicant in that the Ninth Respondent will have the Applicant arrested if the Applicant would continue to request for the financial statements of the International Islands Mission to be made available to the Applicant.

64. The Ninth Respondent is ordered, having served as the secretary of the International Islands Mission, to provide records of all funds received by him in his personal capacity from the International Islands Mission.

The Tenth Respondent

65. The Tenth Respondent is ordered, having served as the as treasurer of the International Islands Mission, to provide records of all funds received by him in his personal capacity from the International Islands Mission.

66. The Tenth Respondent is ordered to provide records of the permission he had received to sell the hobby tools of his aging mother as well as to declare under oath the utilisation of the proceeds thereof.

67. The Tenth Respondent is ordered to provide records of the permission he had received to sell the electric sewing machine of his sister, Ms Charlotte Isabel Botha, as well as to declare under oath the utilisation of the proceeds thereof.

68. The Tenth Respondent is ordered to provide records of the medical reports which had declared that his elderly parents had suffered from Alzheimer and Dementia, prior to the attempts by him, to have his elderly parents taken in by an unregistered Alzheimer and Dementia facility.

The Eleventh Respondent

69. The Eleventh Respondent is ordered to declare under oath, having served as the as chairperson of the International Islands Mission, the reason for having informed the Applicant not to investigate the motive behind the unauthorized donation made by Thirteenth Respondent, as head of missionary work at the Fourteenth Respondent in 1998, to the International Islands Mission, which had led to the withdrawal of the support, the late father of the Applicant, had given the Applicant, after the marriage concluded between the child abuser, Mr Henk Janse Van Vuuren and the Sixteenth Respondent by the Thirteenth Respondent, had resulted in the Applicant permanently losing full custody our his 2 (two) minor children.

70. The Eleventh Respondent is ordered, having served as chairperson of the International Islands Mission, to provide records of all funds received by him in his personal capacity from the International Islands Mission.

The Twelfth Respondent

71. The Twelfth Respondent is ordered to provide records which had led to the suspension of the financial license of the Applicant from AUGUST 2014 to APRIL 2015, after the organization of the Applicant, NSA Developments CC, registration number 1995/41792/23, had provide financial statements, paid their levies and had provide their compliance reports on or about NOVEMBER 2014.

The Thirteenth and Fourteenth Respondents

72. The Fourteenth Respondent is ordered to declare under oath, their motive behind their unauthorized donation in the amount of R80 000.00 (eighty thousand rand) to the International Islands Mission, after the Thirteenth Respondent had concluded the marriage between the child abuser, Mr Henk Janse Van Vuuren and the Sixteenth Respondent, to result in the Sixteenth Respondent losing permanent custody our his 2 (two) minor children.

73. The Fourteenth Respondent is ordered to declare under oath, their failure to have investigated the allegations made by the Applicant against the Thirteenth Respondent.

The Fifteenth Respondent

74. The Fifteenth Respondent is ordered to declare under oath, their failure to have investigated the unauthorized donation in the amount of R80 000.00 (eighty thousand rand) to the International Islands Mission by the Fourteenth Respondent, after the Applicant had reported the Fourteenth Respondent.

The Twenty-first Respondent

75. The Twenty-third Respondent is ordered to declare under oath, the reason for having destroyed the child custody reports she had compiled, soon after the Applicant had picked up the file containing the child custody reports from her office desk at Fourteenth Respondent after which she had called for assistance, to have resulted in four employees of Fourteenth Respondent preventing the Applicant to leave the premises with the filed child custody reports.

76. The Twenty-third Respondent is ordered to declare under oath, the reason for having denied the Applicant access to take his 2 (two) minor children to extracurricular activities, until being informed by the Applicant of his intention to seek a court order to enable him.

The Twenty-second Respondent

77. The Twenty-second Respondent is ordered to declare under oath, their failure to have acted upon the complaint laid by the Applicant on 8 DECEMBER 1998, to have the Twenty-first Respondent investigated.

The Twenty-third Respondent

78. The Twenty-third Respondent is ordered to declare under oath, her reason for having intimidated and threatened the Applicant to place his 2 (two) minor children in an orphanage in the event that the Applicant would have insisted to have the child abuser, Mr Henk Janse Van Vuuren, prosecuted.

The Twenty-fourth Respondent

79. The Twenty-fourth Respondent is ordered to declare under oath, for having taken more than 4 (four) months to have declared to lack jurisdiction to investigate the Twenty-third Respondent upon the complaint laid by the Applicant on 29 JANUARY 1999, after which they

had still aired their opinion in that they had found no wrongdoing in the intimidation of the Applicant by the Twenty-third Respondent.

The Seventeenth Respondent

80. The Seventeenth Respondent is ordered to declare under oath, how the discovery of him and the Eighteenth Respondent having engaged in a romantic act one evening, on or about DECEMBER 1997 at 22h00, had led to the withdrawal by him as legal representative on record of the Sixteenth Respondent, after which the Twentieth Respondent had directly contacted the Applicant and had arranged for the immediate acceptance of the divorce settlement letter by the Sixteenth Respondent.

The Twentieth Respondent

81. The Twentieth Respondent is ordered to declare under oath, the source which had led to the telephonic call by him to the Applicant at 07H00, the morning after the Applicant had discovered the Seventeenth and Eighteenth Respondent and to declare the motive behind his request to the applicant not to report the Seventeenth Respondent to the Sixth Respondent for malpractice.

82. The Twentieth Respondent is ordered to declare under oath, by whom he had been instructed to approach the High Court on 10 DECEMBER 1998, in response to the Urgent Notice of Motion application by the Applicant, after the admittance by the Twentieth Respondent to Honourable Justice Swart, that he had not been briefed by an attorney.

83. The Twentieth Respondent is ordered to declare under oath, his claim to Justice Swart that the High Court had lacked jurisdiction to adjudicate in the matter, in response to the Urgent Notice of Motion application by the Applicant, on 10 DECEMBER 1998.

The Twenty-fifth Respondent

84. The Twenty-fifth Respondent is ordered to declare under oath, their reasons in not having investigated the claims made by the Applicant against the Twentieth Respondent on 16 SEPTEMBER 1997 after the Twentieth Respondent had contacted the Applicant directly at 07H00 on or about DECEMBER 1995, the morning after the Applicant had discovered the Seventeenth and Eighteenth Respondent to request the Applicant not to report the Seventeenth Respondent to the Sixth Respondent for malpractice and in the Twentieth Respondent having consulted directly with the Sixteenth Respondent during the period 1995 to 1997.

The Twenty-sixth Respondent

85. The Twenty-sixth Respondent is ordered to declare under oath, their reasons in not having investigated the claims made by the Applicant against the Twentieth Respondent on 11 FEBRUARY 2014, after the Applicant had received an affidavit by the Sixteenth Respondent declaring her having dealt directly with the Twentieth Respondent upon which the Twentieth Respondent had admitted having consulted directly with the Sixteenth Respondent.

86. If this application is opposed, the Respondents who oppose it are ordered jointly and severally to pay the Applicant's costs.

87. Granting the Applicant further and/or alternative relief.

TAKE FURTHER NOTICE that the Second Respondent is called upon to show cause why the warrant of execution should not be set aside as well as the notice of sale in execution of Immovable Property of the Applicant known as Unit No 1, Wandel Park, 522 Alsatian Drive, Garsfontein, Extension 8, Pretoria.

TAKE FURTHER NOTICE that the Second Respondent is called upon to dispatch to the Registrar of this Honourable Court within 15 (fifteen) days after receipt of this application, the record pertaining to its decision and the reasons for its decision.

TAKE FURTHER NOTICE that if any of the Respondents intend to oppose **PART B** of this application, they are required:

1. to notify the Applicant and the Registrar of this Honourable Court within 15 (fifteen) days after service of this Notice of Motion in terms of Rule 53(4);

2. to appoint an address in terms of Rule 6(5)(b) as an address at which they will accept notice and service of all documents in these proceedings;

3. within 30 (thirty) days after expiry of the time period referred to in Rule 53(4) to deliver their Answering Affidavit(s) if any.

TAKE FURTHER NOTICE that if no notice of intention to oppose is received in respect of the relief sought under **PART B** of this application, it will be enrolled for hearing on a date to be arranged with the Registrar.

KINDLY TAKE FURTHER NOTICE that the accompanying Founding Affidavit attached to this Notice of Motion, deposed to by **DAVID CHRISTAAN BOTHA,** together with annexures thereto, will be used in support of the relief claimed in Parts A and B of this application.

SIGNED AT PRETORIA ON THIS 11th DAY OF MAY 2023.

____

DC BOTHA

IN PERSON

NO 1 WANDEL PARK

522 ALSATIAN DRIVE

GARSFONTEIN, PRETORIA

CELL: 082 452 2778

TO: **THE REGISTRAR OF ABOVE HONOURABLE COURT PRETORIA**

AND TO: **SHERIFF PRETORIA SOUTH EAST**

The First Respondent

By E-MAIL at the following addresses:

contacts@sheriffs.org.za

Physical Address:

1281 Stanza Bopape Street

Hatfield

PRETORIA

AND TO: **THE STANDARD BANK OF SOUTH AFRICA LIMITED**

The Second Respondent

By E-MAIL at the following addresses:

Reportfraud@standardbank.co.za

Emails used in previous communications:

E-pos: bizdirect@standardbank.co.za

E-pos: information@standardbank.co.za

E-pos: Gerald.perumal@standardbank.co.za

E-pos: Natasha.Naidoo2@standardbank.co.za

E-pos: Amina.Shariff@standardbank.co.za

E-pos: Tebogo.Makola@standardbank.co.za

E-pos: Nthabiseng.Motloung@standardbank.co.za

E-pos: Salomie.Weilbach@standardbank.co.za

E-pos: candice.desai@standardbank.co.za

Physical Address:

5 Simmonds Street

Selby

JOHANNESBURG

AND TO: **VESI & DE BEER INCORPORATED**

Attorneys for the Second Respondent

By E-MAIL at the following address:

E-pos: NicoletteC@vezidebeer.co.za

E-pos: info@vezidebeer.co.za

Physical Address:

319 Alpine Road

Lynnwood

PRETORIA

AND TO: **CITY OF TSHWANE METROPOLITAN MUNICIPALITY**

The Third Respondent

By E-MAIL at the following address:

customercare@tshwane.gov.za

Emails used in previous communications:

E-pos: simons@tshwane.gov.za

E-pos: wardah@tshwane.gov.za

E-pos: minkyma@tshwane.gov.za

E-pos: jobm@tshwane.gov.za

E-pos: ninetteb@tshwane.gov.za

E-pos: cornelo@tshwane.gov.za

E-pos: selbyb@tshwane.gov.za

E-pos: azwhangwisim@tshwane.gov.za

E-pos: katlegomathebe@tshwane.gov.za

E-pos: maureenmo@tshwane.gov.za

E-pos: bylawenforcementcenter@tshwane.gov.za

E-pos: Electricity.Prepaid.Installation@Tshwane.gov.za

E-pos: bantihoilem@tshwane.gov.za

E-pos: meterrecords@tshwane@gov.za

E-pos: izabelf@tshwane.gov.za

E-pos: denoshad@tshwane.gov.za

Physical Address:

Tshwane House

320 Madiba Street

PRETORIA

AND TO: **VELILE TINTO & ASSOCIATES INCORPORATED**

The Fourth Respondent

By E-MAIL at the following address:

info@tintolaw.co.za

Physical Address:

Tinto House

Disselboom Avenue

Wapadrand

PRETORIA EAST

AND TO: **CYNTHIA DU PLESSIS**

The Fifth Respondent

By E-MAIL at the following addresses:

info@vfv.co.za

cynthia@vfv.co.za

cynthia@piercegrobler.co.za

Physical Address:

Corporate Place

Block A

39 Selati Street

Ashlea Gardens

PRETORIA

AND TO: **LEGAL PRACTICE COUNCIL**

The Sixth Respondent

By E-MAIL at the following addresses:

info@lpc.org.za

molois@lsnp.org.za

Physical Address:

Thornhill Office Park, Building 20,

94 Bekker Road

Vorna Valley

MIDRAND

AND TO: **WANDEL PARK BODY CORPORATE**

The Seventh Respondent

By E-MAIL at the following addresses:

E-pos: karina.benade@gmail.com

E-pos: mzradebe@gmail.com

E-pos: derikgrobler@gmail.com

E-pos: ahmed.sha911@gmail.com

E-pos: wjfvanwyk@gmail.com

E-pos: atka1@vodamail.co.za

E-pos: annabetta2@yahoo.com

E-pos: delarey@iafrica.com

E-pos: vermeulen.mp@gmail.com

E-pos: marco.vermeulen@protonmail.com

E-pos: minnaarstefan73@gmail.com

E-pos: gideonswartalive@gmail.com

E-pos: yolandi@blinccorporate.co.za

E-pos: admin@rentadmin.co.za

E-pos: juanita@rentadmin.co.za

E-pos: Rentia@RWL.co.za

Physical Address:

522 Alsatian Drive

Garsfontein

PRETORIA

AND TO: **RIAAN OOSTHUYSEN ATTORNEYS INCORPORATED**

t/a **OPROPSA ATTORNEYS**

Executive Management Agent for the Seventh Respondent

By E-MAIL at the following addresses:

riaan@lawyersa.com

anesh@lawyersa.com

ester@lawyersa.com

Physical Address:

10 Humpata Street

Erasmuskloof

PRETORIA

AND TO: **COMMUNITY SCHEMES OMBUD SERVICES**

The Eighth Respondent

By E-MAIL at the following addresses:

Letsekang.Moshoeshoe@csos.org.za

info@csos.org.za

glynis.naidoo-appels@csos.org.za

Sylvia.Kgosiemang@csos.org.za

karen.bleigs@csos.org.za

kanozi.mlotha@csos.org.za

johlenewassermam@theppra.org.za

Physical Address:

Building 4

Berkley Office Park

8 Bauhinia Street

Highveld Techno Park

CENTURION

AND TO: **PASTOR (Dr) T.I.M JOOSTE**

The Ninth Respondent

By E-MAIL at the following address:

timjooste@webmail.co.za

Physical Address:

893 Tiptol Street

Silverton

PRETORIA

AND TO: **NOVUS VITA CHRISTIAN CHURCH**

Church for the Ninth Respondent

By E-MAIL at the following address:

tim.jooste@novuvita.co.za

Physical Address:

893 Tiptol Street

Silverton

PRETORIA

AND TO: **NICO FRANCOIS BOTHA**

The Tenth Respondent

By E-MAIL at the following address:

nico.botha.954@gmail.com

Physical Address:

____

AND TO: **REVEREND PETER MALAN**

The Eleventh Respondent

By E-MAIL at the following addresses:

peter@3d-acts.com

info@indexproperty.co.za

Physical Address:

Estate Agent by Index Property Solutions

Elaleni Coastal Forest Estate

Sheffield Beach

Ballitoville

KWA ZULU NATAL

AND TO: **FINANCIAL SECTOR CONDUCT AUTHORITY**

The Twelfth Respondent

By E-MAIL at the following addresses:

fscacommunications@fsca.co.za

fsca@behonest.co.za

Physical Address:

41 Matroosberg Road

Ashlea Gardens

PRETORIA

AND TO: **REVEREND HENDRIK SAAYMAN**

The Thirteenth Respondent

By E-MAIL at the following address:

info@moreleta.co.za

Physical Address:

NG Moreleta Kerk

1353 De Villabois Mareuil Avenue

Moreletapark

PRETORIA

AND TO: **NEDERDUITSE GEREFORMEERDE MORELETA KERK**

The Fourteenth Respondent

By E-MAIL at the following address:

info@moreleta.co.za

Physical Address:

1353 De Villabois Mareuil Avenue

Moreletapark

PRETORIA

AND TO: **NEDERDUITSE GEREFORMEERDE KERK**

The Fifteenth Respondent

By E-MAIL at the following addresses:

algemenesinode@ngkerk.org.za

info@ngkerk.org.za

Physical Address:

c/o Shoba and Pretorius Streets

PRETORIA

AND TO: **MOIRA ELIZABETH RETIEF**

The Sixteenth Respondent

By hand

Physical Address:

Mopani Flats

Lion Street

Monument Park

PRETORIA

AND TO: **LEON MALAN**

The Seventeenth Respondent

By E-MAIL at the following addresses:

leon@malanmohalelaw.co.za

Physical Address:

Malan & Mohale Attorneys

462 Julius Jeppe Street

Waterkloof

PRETORIA

AND TO: **MIRIé TALJAARD**

The Eighteenth Respondent

By E-MAIL at the following addresses:

leon@malanmohalelaw.co.za

Physical Address:

Malan & Mohale Attorneys

462 Julius Jeppe Street

Waterkloof

PRETORIA

AND TO: **SURITA KILIAN MARAIS**

The Nineteenth Respondent

By E-MAIL at the following addresses:

admin@suritamarais.co.za

Physical Address:

Surita Marias Attorneys

755 Park Street

Sunnyside

PRETORIA

AND TO: **ADV BERTI BLOM**

The Twentieth Respondent

By E-MAIL at the following addresses:

cbc@capebar.co.za

Physical Address:

Ground Floor

Hugenot Chambers

40 Queen Victoria Street

CAPE TOWN

AND TO: **HELENA VAN EMMENIS**

The Twenty-first Respondent

By E-MAIL at the following addresses:

info@cmroos.co.za

henda@cmroos.co.za

info@moreleta.co.za

Physical Address:

NG Moreleta Kerk

1353 De Villabois Mareuil Avenue

Moreletapark

PRETORIA

AND TO: **CHRISTELIKE MAATSKAPLIKE RAAD**

The Twenty-second

By E-MAIL at the following addresses:

info@cmroos.co.za

henda@cmroos.co.za

Physical Address:

430 Quebec Street

Faerie Glen

PRETORIA

AND TO: **COMMISSIONER SARIE SNYMAN**

The Twenty-third Respondent

By E-MAIL at the following addresses:

MiNiewoudt@justice.gov.za

Physical Address:

5th Floor

266 Center Walk Building (West Tower)

c/o Thabo Sehume & Pretorius Streets

Pretoria

AND TO: **MAGISTRATE COMMISSION**

The Twenty-fourth Respondent

By E-MAIL at the following addresses:

MiNiewoudt@justice.gov.za

Physical Address:

5th Floor

266 Center Walk Building (West Tower)

c/o Thabo Sehume & Pretorius Streets

Pretoria

AND TO: **PRETORIA BAR**

The Twenty-fifth Respondent

By Hand

Physical Address:

Ground Floor

Brooklyn Bridge Office Park

Stevens House

570 Fehrsen Street

PRETORIA

AND TO: **CAPE TOWN BAR**

Twenty-sixth Respondent

By E-MAIL at the following address:

cbc@capebar.co.za

Physical Address:

Ground Floor

Hugenot Chambers

40 Queen Victoria Street

CAPE TOWN

AND TO: **AFRIFORUM**

Twenty-seventh Respondent

By E-MAIL at the following addresses:

afriforum@afriforum.co.za

phyllis.vorster@afriforum.co.za

Physical Address:

58 Union Avenue

Kloofsig

CENTURION

AND TO: **THE REGISTRAR OF DEEDS**

Twenty-eighth Respondent

By Hand

Physical Address:

Merino Building

140 Pretorius Street

PRETORIA