resources of the airline she had bankrupted, to engage a shady lawyer, to work with Vlok, to silence me. Vlok was the real investigating officer, and he was put into that position, by Moonoo, who himself was facing prison, if only there was anyone that would have investigated the multiple criminal dockets I had opened against him. It is this Myeni case, that Vlok used, to fraudulently obtain a search warrant at Randburg Court, which enabled him to then unlawfully seize my laptop computers and about a dozen empty memory sticks. He subsequently committed the offence of Contempt of Court, by unlawfully retaining and harvesting a copy of the contents of my laptop. In respect of this case, I had to endure **EIGHT days over TWENTY-ONE months**, before the case was thrown out of court.

OR TAMBO CAS 6/4/2016 (previously Pretoria Central CAS

51

This the fake case opened against me AFTER I had been unlawfully arrested, dragged off a plane with my 8- and 9-year-old daughters, assaulted and hand cuffed in front of them. The case was opened in front of me at Pretoria Central Police Station, in the presence of Vlok, Hoosen and Mokotedi, but the criminals with badges decided to add a corrupt cop by the name of Mkupa as the 'Investigating Officer' so that they could claim they were not involved. Despite Vlok's dishonesty in pretending NOT to be involved, he spent longer in the witness box than any of his dishonest accomplices, when he repeatedly worked to try and prevent me from relaxing my bail conditions so that I could visit my family overseas. He repeatedly lied in the witness box and was caught out in his lies during cross examination. His main accomplice here, as in the Kempton Park case, was the dishonest prosecutor Mlotshwa. I was eventually acquitted of all the fake charges against me, after having spent **TWELVE days over FIFTEEN months** in court.

ROSEBANK CAS 47/5/2016

52

Vlok found on my computer, the salient details of how this woman (**Cora van der Merwe**) had been interviewed by myself and a colleague (Melissa Naidu) in 2014, at which time van der Merwe admitted stealing from her employer and handing what she stole to a journalist boyfriend of hers, who in turn shared the stolen files with a competitor of her employer. Vlok had contacted

E-m

her and persuaded her to open a criminal docket of kidnapping, after harvesting the contents of my laptop. The allegations cooked up by her, assisted by Vlok, were completely fabricated. And the docket was opened EIGHTEEN months AFTER the alleged kidnapping. However, when Vlok and van der Merwe cooked up the fake case, neither of them knew that I had in my possession recordings of the meetings myself and Melissa Naidu had with van der Merwe, which recordings, completely destroyed the fake case they had assembled. Once again Mlotshwa and Mokotedi were Vlok's sidekicks in court, with Mlotshwa being the prosecutor. It was during this trial, that Vlok wandered into the court one day, together with Mokotedi, with a large lever arch file under his arm. The lever arch file had the words **'DOUGLAS FLIESS'** emblazoned on the spine of the file. Vlok had secret meetings inside the court with the control prosecutor, Mrs Smith, and the Douglas Fliess file. Melissa Naidu and I were acquitted after **THIRTY-THREE days over EIGHTEEN** months in court.

BRAMLEY CAS 414/4/2016

53

Vlok found on the (criminally retained) copy of my laptop, the full details of the interviews I had with a certain **Ms Alice Johnston**, in July 2014. During these interviews, Johnston had admitted her role in fraud and theft from her employer, as well as conspiring to murder her employer, a Mr James Murray. She was never tried for the conspiracy to commit murder, due to the incompetence of the police. Her employer subsequently died of a heart attack, before she could go on trial for the conspiracy to commit murder, effectively scuppering the case against her. However, Johnston's fraud and theft got her a conviction and prison sentence of SEVEN years, suspended for FIVE years, despite the fact that Vlok had attended at the court where she was on trial and attempted to get the prosecutor to drop the charges. In return for helping Johnston get off the hook on her fraud and theft charges, he persuaded her to open a fake case against me, alleging extortion, some two years after the alleged event. Once again, the corrupt and dishonest Mlotshwa was the prosecutor and, once again, he would demonstrate his arrogant criminality. The fake docket that Vlok talked Johnston into opening, alleged I had extorted her into admitting her fraud and theft, as well as attempted murder, some **TWENTY-ONE MONTHS** earlier, in 2014. Once again, the ONLY way Vlok could have known about the existence of Johnston, was from the

E.M

criminally unlawful copy of my laptop in his possession. The trial ended with an acquittal after **TWENTY days over TWENTY-FOUR MONTHS** in court.

ALBERTON CAS 799/11/2012

54

Vlok's conduct of harvesting the unlawfully owned copy of my laptop in his possession, was not bearing the fruit that he, Mokotedi, Mlotshwa and the rest of the State Capture team had hoped for. Vlok and Mlotshwa decided to change tactics. Vlok went to Alberton police station and withdrew Alberton CAS 799/11/2012. Not only did he refuse to sign for it on the CAS system, but he also unlawfully held himself out to be a 'Captain', a fact he knew to be a lie.

55

The Alberton CAS in question, was a docket opened by a suspect my firm had been investigating, in connection with the theft of R6.5m from a deceased estate, in 2012. The ONLY suspect a Mr Neil Diamond **'Diamond'**, had forged a will, putting himself in as executor and then repaid purported 'loans' from the deceased to him, from the estate. Naidu and I visited Diamond in his office and warned him that if he did not put the money back into the estate, a criminal docket would be opened against him and he would have to defend himself in a criminal trial. Diamond, as is the way with some of the criminals our firm investigates, decided to create a red herring by falsely accusing me and Naidu of extortion. I was invited to present a warning statement and, instead gave a detailed sworn statement setting out exactly why Diamond was lying. In addition, a comprehensive docket alleging Forgery, Uttering a Forged Document, Fraud and Theft was opened against Diamond, who subsequently fled to the United States.

56

Having seen my sworn statement, the prosecutor at Palm Ridge promptly closed Diamond's false docket. The docket was subsequently returned to the Alberton Police station and lay there gathering dust until Vlok arrived at the police station, claiming to be a Captain and 'took' the docket. The docket was taken back to Mlotshwa, who obviously read it and the pair of them decided to claim that the docket had gone 'missing'. Vlok then reconstituted the docket only this time, he sat with Diamond and concocted a story that would work best for the pair of them, yet without a shred of evidence. Mlotshwa then, without obtaining any warning statement from me, too an unlawful decision to prosecute both myself and Naidu for the offence of extortion.

57

As in all the other cases, the ONLY way Vlok could have known about the Alberton case, is because he found it on my laptop, a copy of which he had unlawful possession of. Having obtained the J175 from Mlotshwa, Vlok tried to ambush me in the street in Kempton Park, causing me to swerve to miss him. He subsequently got accomplices of his to serve the J175 on me whilst I was in court on one of Vlok's other trumped-up cases in Randburg. Eventually, the State withdrew the charges, after I had wasted **SIX days over ELEVEN** months in court, as well as substantial legal costs.

KAMEELDRIFT CAS 12/1/2017

58

In early 2016, I had opened a criminal case of corruption against acting chief of police Lt General Kgomotso Phahlane **'Phahlane'**. In addition, I opened a case against him in June 2016, for the offence of defeating the ends of justice, for his protection given to Lt General Moonoo. Phahlane managed to avoid any investigations, because IPID had been 'captured' by criminals, after Robert McBride had been suspended and its acting head Isaac Kgamanyane, had turned rogue and was 'protecting' the senior corrupt police officials, instead of charging them and bringing them to justice. This all changed in November 2016, when Robert McBride was reinstated after the Constitutional Court ruled that his suspension was unlawful.

59

Upon McBride's return to duty, I quickly set up meetings with him, to explain the case against Phahlane. Events moved rapidly and by early January 2017, Phahlane had been summoned to IPID headquarters for a warning statement to be taken from him. Instead of presenting himself for a warning statement, Phahlane started a counter-investigation, by corrupt police officials, who were later aided and abetted by Vlok. My legal advisor was 'kidnapped' from my offices on a Friday afternoon in mid-February, resulting in an urgent application for her release which took place on the Sunday night. The following day, despite a high court order that the police could NOT arrest me, I was arrested at gunpoint by five vehicles filled with more than a dozen police

E.M

officials. I was taken off to Kameeldrift police station and again unlawfully detained in rat-infested conditions.

60

IPID then launched an urgent application in the High Court and the corrupt police officials involved were ordered NOT to participate in the investigation against IPID. They still wanted to prosecute me. This was the first and only case not involving Mlotshwa. His replacement was a corrupt prosecutor by the name of Advocate Michael Mashuga **'Mashuga'**. Mashuga was not only corrupt, but he was also incredibly stupid, as he made a multiplicity of mistakes, even going so far as to attempt to have the case transferred to the High Court and charge me with Racketeering. Eventually, after wasting FIVE days over NINE months, in court, the matter was struck off.

61

Considering that Vlok was not the 'originator' of the Kameeldrift case, the reader might question why I have even included it in this sworn statement. The answer is a simple one; Vlok was instructed by Moonoo, despite Moonoo having gone on early retirement, to find common cause with Phahlane and the corrupt senior police officials that were his accomplices. I am 100% certain that Vlok did find common cause with Phahlane and his accomplices, because Vlok was so stupid as to provide me with evidence of this. On 2017-05-16, Vlok attended a Parliamentary Portfolio Committee meeting, along with Phahlane and his accomplices and sat there with them, whilst Phahlane publicly accused me of having 'captured' IPID, which he facetiously renamed 'OPID'. Phahlane also read out my personal details, which were broadcast on national Television, including my ID number, my address, my phone number and he also read out messages stolen form my telephone, when his accomplices unlawfully arrested me. I therefore submit the following evidence of Vlok's involvement in that case, being a screen dump of him sitting in parliament together with Phahlane and his accomplices: -

https://www.youtube.com/watch?v=BZR_Y-fymZQ

E.M

General Mabula & Colonel Dawood kidnapped my Legal Advisor, on 2017-02-10 and three days later, 2017-02-13, unlawfully arrested me. I submit that the above is *prima facie* evidence that Vlok was part of the conspiracy, as three months later, the whole team is in parliament together!

THE FISH THAT GOT AWAY!

62

In the preceding paragraphs, I have documented the cases that Vlok and his associates managed to get to court, which demonstrate the unlawful harvesting of my laptop computer by Vlok. The harvesting took place AFTER the high court had ordered that the contents must be returned to me and/or destroyed. The manifestation of the evidence is clear for all to see. It is important now, to document the matters where Vlok tried desperately to assemble fake cases against me but could not get it together. In detailing the following cases, I will show, beyond reasonable doubt, that Vlok could not have sucked the details out of fresh air and could ONLY have gotten the information from my laptop computer, unless he was gifted by a magician with a crystal ball.

FRED DANIEL - APPROACHED BY VLOK'S (CONVICTED FRAUDSTER) AGENT

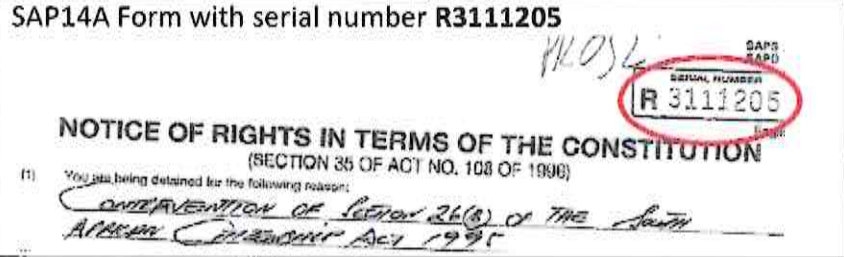
63

I have already documented the Fred Daniel matter, and Mr Daniel has made a detailed sworn statement about the approach made towards him by a convicted fraudster, by the name of Mr Mike Bolhuis. Of note is that the convicted fraudster Mike Bolhuis is a close friend of Vlok and has been for many years. On 2016-04-01, when I was unlawfully arrested, detained and tortured for three days, I arrived at Pretoria Central Police Station at approximately 22h00. When Vlok and his accomplices had finished 'processing' me, which processing included the unlawful downloading of my cellular telephone, I was required by these criminals with badges to sign a form. The form pertains to the reading to the 'arrested person' of his or her rights. Each such form has a serial number on it, for record purposes. The direct and provable link between Vlok and Bolhuis came at TWO minutes past midnight on 2016-04-02, when Bolhuis published the following on his Twitter or Facebook: -

12:02AM 2 Apr 2016

The red ovals are placed by me, to draw attention to the serial number of the form, and the date and time Bolhuis published it on his facebook page. I have also typed the date and time alongside; in case it is hard to read. In contrast, the 'Notice of Rights' form paced before me for signature, whilst I was in unlawful detention, was placed before me by one of Vlok's accomplices, Hoosen, in Vlok's presence at 00h30 on 2016-04-02 and proof of this is shown below: -

SAP14A Form with serial number **R3111205**



SAPS
SAPD
SERIAL NUMBER
R 3111205

NOTICE OF RIGHTS IN TERMS OF THE CONSTITUTION
(SECTION 35 OF ACT NO. 108 OF 1996)

(1) You are being detained for the following reason:
Contravention of Section 26(b) of the South African Citizenship Act 1995

E.M

SAP14A Form dated and signed on **2016-04-02** at **00:30**.


CERTIFICATE BY DETAINEE

I, Paul Robert O'Sullivan (name of detainee) hereby certify that I have been informed in English (state language) of my rights in terms of the Constitution as set out above by (name of person who informed the detainee) and that I understand the contents thereof.

DATE: 2016-04-02 (Informed) TIME: 00:30 (Informed) PLACE: (Informed)

SIGNATURE/THUMBPRINT OF DETAINEE

SIGNATURE OF PERSON WHO INFORMED THE DETAINEE

Since it is common cause that Vlok and Bolhuis are joined at the hip, it can ONLY be that Vlok informed Bolhuis of such information, half an hour before the form was placed in front of me for signing, in breach of Section 70, of the Police Service Act, which clearly states the following: -

> **70 Unauthorised disclosure of information**
>
> Any member who wilfully discloses information in circumstances in which he or she knows, or could reasonably be expected to know, that such a disclosure will or may prejudicially affect the exercise or the performance by the Service of the powers or the functions referred to in section 215 of the Constitution, shall be guilty of an offence and liable on conviction to a fine or to imprisonment for a period not exceeding two years.

Section 70 of the Police Service Act is just another one of the many offences committed by Vlok, who clearly believed he was above the law, simply because he had the backing of the corrupt Moonoo and many other corrupt senior police officials, including Phahlane, Mokotedi and Ntlemeza. The above connection between Vlok and Bolhuis is just the tip of the iceberg. It can be proven that Bolhuis was UNLAWFULLY involved in my arrest, when considering the words attributed to him in a media interview he gave: - https://www.news24.com/news24/osullivans-attorney-he-was-not-fleeing-the-country-20160402

> Earlier on Saturday Private investigator Mike Bolhuis told News24 O'Sullivan had three passports in his possession and was arrested for contravention of the Immigration Act.
>
> *"He was arrested by the Pretoria Hawks task team… other police units were involved as well. He was with his ex-wife and daughter.*
>
> *"He had almost gotten away because of his platinum flight status, but we managed to flag him before he could leave,"* Bolhuis said.

64

The close relationship between the convicted fraudster and Vlok, is therefore common cause and that the only conclusion that can be arrived at, is that they communicated with each, at or before midnight, after Vlok had been a part of the criminal syndicate that had dragged me off a plane at OR Tambo Airport, and assaulted and handcuffed me, in front of my EIGHT year old and NINE year older minor daughters. Vlok no doubt sent Bolhuis a message with the details, so that Bolhuis could publish same, in breach of the law and my Constitutional rights. To put matters into perspective, it is best to understand the calibre of the convicted Bolhuis, with whom Vlok had formed a close liaison: -

1. **Brooklyn CAS 10/1/1997**
   ARRESTED Assaulting a female, to wit Melanie Storm (Case withdrawn)
2. **Pretoria Central CAS 2123/11/1999**
   CONVICTED Fraud on 2000-05-04 at Pretoria Court file 2000/T20023
   SENTENCED Three years in Prison, suspended for five years CR BG5308
3. **Kameeldrift CAS 179/10/2006**
   CONVICTED Breach of Act 108 of 1996, operating a security company without being registered on 2006-10-30
   SENTENCE Fine of R2, 000.00
4. **Kameeldrift CAS 64/6/2008**
   ARRESTED Breaching Arms & Ammunition Act, handing over firearms to persons not in possession of licences (Case withdrawn)

65

Accordingly, the sworn statement of Fred Daniel is very relevant, as it indicates that Bolhuis, without saying as much, was 'sent' by Vlok on a fishing trip, to see if he could convert Fred Daniel from being a client of mine, to being a state witness against me, in some or other fabricated case against me of fraud. Bolhuis made it clear to Daniel that if he became a witness against me, he, Bolhuis, would take on the case of Daniel, free of charge and bring it to successful conclusion. The difficulty with Bolhuis' promise to Daniel is twofold: -

- Bolhuis has no recognised specialist skills or training of any nature, whereas I am a highly skilled certified fraud examiner with more than 45 years of experience and a team of highly qualified professionals behind me.
- Bolhuis had no institutional knowledge of a FOUR years old project.
- Bolhuis lacked the mental capacity, to be able to continue to investigate the case I had worked on for Fred Daniel since 2013 and would have only messed it up.

E.M

66

It is therefore my submission that Vlok, unlawfully and intentionally shared the contents of my laptop, which contents he was NEVER in lawful possession of, with a shady private investigator, for the purpose of unlawfully getting a client to turn against me and open a false criminal complaint against me. Fortunately, Fred Daniel, had more ethics than Vlok and Bolhuis combined and instead of joining their criminal scheme, instead chose to report same to me and make a sworn statement. I am 100% certain that neither Vlok, nor Bolhuis will ever be able to explain the above facts, which places the pair of them in jeopardy with the criminal justice system.

VLOK, BOLHUIS, VILJOEN & THOMAS

67

The final evidence I wish to come to, in respect of the relationship between Vlok and Bolhuis, is clearly set out in the sworn statement dated of Peet Viljoen, **'Viljoen'** a Pretoria attorney, who was struck from the role of attorneys and sequestrated for alleged theft of land belonging to the city council of Johannesburg. To the best of my knowledge and belief, Viljoen was criminally charged, but I have no factual details of the alleged theft of land, or the status of any criminal case against him. I have not met with Viljoen, for at least the last SIX years, at which time he handed me copies of two statements: -

67.1

The first statement he gave me was dated 2017-01-31 and is attached as **Annexure 'POS-12'**. This statement sets out a history between Viljoen and Vlok and brings in the names of other certain shady characters such as Chad Thomas and Lance Epstein. At the outset, Viljoen makes it very clear that it was Bolhuis, that brought them together. Viljoen also mentions that Vlok refers to an 'investor' and 'fish and chip shop franchise' and that I and a person called Zunaid Moti **'Moti'** had defrauded the fish and chip people out of millions. For the sake of clarity, it is not possible for Vlok to have been able to relay any such information to Viljoen, without being in receipt of the information he had stolen from my laptop.

67.1.1

In truth, I should state: - I had acted for a franchisor, of 70 stores known as Old Fashioned Fish and Chips (Pty) Limited **'OFFC'**, in 2014, after a director had stolen millions from the company.

During the course of my investigations, it became clear to me that OFFC needed urgent bridging finance, or it would not be able to meet its day-to-day commitments. I introduced the owners to a person who lent them R6m, repayable over three months. As security for the loan, the lender took possession of 100% of the shares in the company, as collateral. Towards the end of the repayment term, it became clear that the loan would not be repaid, so the lender made arrangements to sell the company, lock, stock, and barrel, for a figure of R10million. A few days before the deadline, Moti stepped in after he had been approached by the OFFC owners. Moti then lent the owners the R4.5m owing to the original lender, which funds were paid through my company, Paul O'Sullivan & Associates. Moti subsequently liquidated the company, as they could not repay his loan to them. I know this is a lot of detail, but the truth should be visible in all that I say.

67.2

The second statement given me by Viljoen, dated 2017-02-18 is only TWO pages long. A copy of that statement is attached as **Annexure 'POS-13'**. Although I recall seeing the transcript referred to therein, I cannot now lay my hands on it. I wish that the whole of Annexure 'POS-13' be taken as if specifically incorporated herein, particularly the last paragraph on page 2, which states: -

67.2.1

> *"I also wish to mention as further evidence of the fact that the meeting was about Paul O'Sullivan, some SMS or whatsup exchanges between myself and Lance Epstein, which I attached to the previous affidavit. Although Epstein makes it clear there, that he has no mandate and is not being paid, this is in contradiction of what he told me at 1170 Breyer Avenue on 2016-12-05, where he made it clear that he was being paid by 'the project' and 'the project' was to take down Paul O'Sullivan, for 'destabilising the country'. If anyone alleges differently, they are lying."*

68

The above-mentioned statements of Viljoen, not only prove beyond reasonable doubt, the historical relationship between Vlok and the convicted fraudster, Bolhuis, it also makes it obvious that Vlok was at the centre of a tax-payer funded illegal 'project' aimed at silencing me and either getting me to flee the country, or putting me under so much pressure with legal fees I would run out of money and give up, with my work in trying to rid the country of corrupt leaders in the police and NPA. It also provides further evidence of Vlok harvesting my laptop contents. There

E.M

can be no doubt that from as far back as late 2016, Vlok was at the centre of a criminal enterprise aimed at taking me down, simply because he had an unlawful copy of my laptop.

THE HARTBEESPOORT INCIDENT

69

In or during late 2011, my firm was involved in the investigation of a case involving conspiracy to commit murder, the crime took place near Hartbeespoort Dam and the investigation was carried out by Warrant Officer Gysbert Coetzee, under **Hartbeespoort Dam CAS 31/11/2011**. The reader will recall that I previously referred to Coetzee, at paragraph 18, when I explained how he happened to be working under Moonoo, together with Vlok in 2014, and was aware that Vlok was fishing around for any 'dirt' that could be used to take me down. Clearly, Vlok knew Coetzee and decided to utilise the contents of my laptop, to attempt to extort him into lying about me, as is clearly set out in Coetzee's statement of 2016-09-23, which I do not intend to include as an annexure to this statement as, to do so would amount to duplication. It is already included in the criminal complaint I laid against Vlok.

70

The biggest mistake Vlok made, when he threatened Coetzee in September 2016, was to lie about how he had in his possession copies of J50's which he falsely alleged I had forged and stamped and provided to Coetzee, to arrest suspects in the above-mentioned police case. He lied to Coetzee that Kim Marriott of my office had come to him and given him a sworn statement implicating both me, and him, in crimes. He also lied, in that he said Marriott had given him her old work computer, and he had recovered the J50's from that. Unbeknown to Vlok, I still had contact with Marriott. Although she was a on a sabbatical to take her LLB degree, Marriott was still involved in work at my office. I contacted Marriott and she made it clear that, not only had she never given Vlok her old work computer, she had never even heard of, let alone met and provided a sworn statement, to Vlok. Vlok's lies were his downfall, as I obtained Marriott's version under oath. Coetzee also makes mention of the fact that, it was actually Marriott, not I, that had assisted his police work, by preparing the J50 templates.

E-M

THE STOLEN MILITARY AMMUNITION – STELLA NGWENYA (MILITARY POLICE)

71

As this relates to at least one of the charges Vlok is facing, I will just present a brief history, as most of it is already captured in witness statements. During 2013, as part of many of the pro bono projects we work on, I instructed a senior employee, Kim Marriott, 'Marriott', to assist a certain Warrant Officer Stella Ngwenya, **'Ngwenya'**, of the Military Police, with **Lenasia CAS 5/4/2013**, which involved the theft of large amounts of 7.62mm ammunition. I chose to assist because, the stealing of military ammunition, if allowed to go unchecked, could result in anarchy in South Africa. During the course of the assistance rendered, Marriott had prepared the various templates for search and seizure warrants, as well as the templates for the J50 arrest warrants of the suspects. I had also assisted by tracking down for interview and even typing the sworn statement of a certain State Witness, Freddie Labuschagne. More about the case in question can be seen here: - https://www.iol.co.za/news/dave-sheer-boss-gets-strict-bail-conditions-1552545 My active involvement in the case ceased in or about late 2013, after the suspects had been arrested and the matter had gone to trial.

72

In September 2016, as a direct result of Vlok's harvesting of my computer contents, he came across the search and seizure warrants and/or the arrest warrants, in respect of Lenasia Cas 5/4/2013. These were on my computer, because Kim Marriott would have e-mailed them to me, and I downloaded them and saved them on my laptop. Vlok then jumped to conclusions and fabricated the story that I had forged these documents. Nothing could be further from the truth. I pause to mention that there is NO other way that Vlok could have had the knowledge of the matter, or possession of the warrants, other than from my laptop contents. Vlok then, unlawfully, telephoned Ngwenya and attempted to extort her, by lying to her that I had given him a sworn statement implicating Ngwenya, along with myself, in forging fake search and seizure warrants and arrest warrants. His difficulty was in explaining how he had come into possession of such warrants and to make his lies seem plausible, he ADMITTED to Ngwenya, that he was in possession of my laptop contents. This was the first and only time Vlok admitted to anyone that he was in possession of a copy of my laptop computer.

E.M

73

Vlok's admission to Ngwenya is therefore very significant, because when taken with his lies to Coetzee, clearly proves he had documents that were ONLY to be found on either mine or Marriott's computer. Since Marriott had NEVER given her laptop to anyone, it is clear that Vlok had my computer contents and was unlawfully harvesting same, to extort various people.

THE CORRUPT ATTORNEY AND CORRUPT COP

74

It can be no coincidence, that in late 2014, I opened a criminal docket against a corrupt attorney by the name of Ebrahim Saleem, **'Ebrahim'**, and one of the many corrupt cops he paid bribes to, Lt General Vineshkumar Moonoo. I have often mentioned Moonoo hereinbefore, for the simple reason that it was the corruption of Moonoo and my reporting of same, that led Moonoo to direct Vlok to find what he could, against me, that could be used to take me down, after I had opened various criminal dockets against Moonoo. For Moonoo, it was a simple choice of 'nail or be nailed'. Put simply, Moonoo had to neutralise me, or see himself being carted off to prison. Because of the continued 'Capture' of the criminal justice system, Moonoo still seems to be immune to criminal prosecution. I suspect that will continue until after Moonoo is in his grave, because the criminal justice system remains captured and overworked.

75

After I opened a criminal docket against Ebrahim and Moonoo, for the offences of corruption, the docket was quietly quashed. However, as part of his 'fightback' strategy, Ebrahim also opened a criminal docket, against me alleging extortion. Vlok would have seen all the details on my laptop computer, because he quickly picked up on it and was keen to brag about the case in question, whilst giving evidence in part of the crooked Mlotshwa's desperate attempt stop me from getting my passport back, so I could visit my pre-teen daughters in the UK. In this regard I refer to the transcript of my trial on Vlok's trumped up charges of allegedly violating Section 26B of the South Africa Citizenship Act, by using my Irish Passport to enter and leave South Africa. In particular I refer to page 169 of the court record transcript in the fake passport trial brought against me. In this case, it would have been too obvious if Vlok had been the only one giving evidence when the corrupt prosecutor Mlotshwa had opposed my application to get my passport, so I could visit my

S.M

daughter for her tenth birthday. Mlotshwa, in conspiracy with Vlok, had therefore shared the testimonial workload with a corrupt Captain in DPCI, by the name of Mkupa. The difficulty was that Mkupa did not have a clue what he was talking about, as it had been fed to him by Vlok and Mlotshwa, which became clear during his testimony. I pause to state that Mkupa mentioned various cases, which upon cross examination, he simply could not give proper answers, making it clear that he was simply supplying purported 'facts' to the court, that had been fed to him by Vlok and/or Mlotshwa. It was impossible for Mlotshwa's only witness in opposing my application to go overseas, could be Vlok, so the workload was spread, so as to make it look like I was a hardened criminal, when the truth be known, I was simply going after hardened criminals with badges, who masqueraded as Generals in the police.

76

In the above regard, I refer to page 169 of the court record at Kempton Park, on **2016-07-06**, when I had brought an application to relax my bail conditions, so I could fly overseas for my daughter's tenth birthday celebrations, where the corrupt Mkupa stated the following, in response to questions from the corrupt Mlotshwa, about what cases I was still to face prosecution under: -

PAGE 168: -	
MLOTSHWA	Can you tell us about those cases?
MKUPA	It is Kempton Park CAS 679/2/2016, Extortion Fraud, Forgery and Uttering. It is the SAA case that was being talked about or the main suspects in this matter and it is the one of OR Tambo of 6/4/2016, it is the mater we are currently dealing with. And it is that Pretoria Central CAS 380/4/2016.
MLOTSHWA	What is the case number?
MKUPA	380/4/2016 it is the corruption act and other charges. There is a **Johannesburg Central CAS 755/5/2014** theft and corruption and extortion. There is an **Alberton CAS 799/11/2012** extortion and intimidation. It is **Bramley CAS 47/5/2016.**
COURT	Just repeat the number again?
MKUPA	**Bramley CAS 47/5/2016** it is the kidnapping charge. It is now **Midrand CAS 867/6/2016** it is forgery. All these offences have different investigating officers.

The Johannesburg Central CAS 755/5/2014, mentioned above, is the fake docket opened by Moonoo's corrupt attorney friend, against me, as a red herring for the cases I had opened against Ebrahim and Moonoo.

E. M

77

Curiously Vlok stated on 2016-07-06, on page 176 to 179, of the same transcript, the following words, which he cannot now take back, when questioned by Mlotshwa and the Court: -

PAGE 176/177: -	
MLOTSHWA	Are you an investigating officer of some of the matters against the accused?
VLOK	That is correct.
MLOTSHWA	How many matters are you investigating against the accused?
VLOK	Three at the moment.
MLOTSHWA	Which are?
VLOK	One of the case numbers is – I think it is 755, it is a Johannesburg Central case of extortion and intimidation and theft.
MLOTSHWA	The next one?
VLOK	And the other two are new matters, that is fraud and then the other one is an unlawful arrest, fraud and impersonation as a police officer.
MLOTSHWA	Yes. The one for fraud, where is it registered?
VLOK	The one for fraud the complainant is the liquidator of Old Fashion Fish and Chips. It is on an inquiry at NINU and the docket will be registered this week.
MLOTSHWA	What are the allegations by the accused in that matter?
VLOK	The allegations are the owner of Old Fashion Fish and Chips it is a Portuguese lady she approached our office and complain that they liquidate her company.

I pause to mention that Vlok expected the court to swallow his fabrication, that some Portuguese lady, approached HIS office, the location of which was unknown, with a complaint for him to investigate, instead of going to her local police station. The truth is that Vlok was LYING to the court at Kempton Park; he had found the details of the Old Fashion Fish and Chips matter on my computer, and he approached the Portuguese lady, who was by then a suspect in fraud that brought her company into liquidation; she NEVER approached him.

78

Vlok's deception to the court, continued: -

PAGE 178: -	
MLOTSHWA	You said there was the other one for forgery, or is it fraud or what?
VLOK	The other one was J50's that was issued on a fraudulent basis. The other suspect, there are two suspects it is Mr O'Sullivan as well as a lady from the Defence Force, where false J50's were issued and two suspects were arrested

E.M

	and they were detained for 12 days and the matter was thrown out of court and then they were arrested again on different J50's. So they did open a docket 298/6/2014 OR Tambo for this unlawful arrest and fraud and J50's were issued on that docket but it was cancelled the day it was supposed to be issued. The reason for that was because they want all the cases against the complainant to be finalised then they can reissue the summons.
MLOTSHWA	Then what is Mr O'Sullivan supposed to have done there?
VLOK	He was involved with the unlawful arrest as well as the issue of the J50's.
MLOTSHWA	Which were not supposed to be issued?
VLOK	That is correct, yes.
MLOTSHWA	Is there any other matter that you are involved in?
VLOK	No, that is the only matters.

I again pause to mention that Vlok's last answer was an OUTRIGHT lie to the court at Kempton Park, which makes him guilty of the offence of perjury. I pause to mention that the lady in the Defence Force, Vlok mentions, is the very same Warrant Officer Ngwenya of the Military Police, whom he called in October 2016, to extort, intimidate and inform that he had a sworn statement from me, implicating her, as well as my computer.

79

On page 179, the Presiding Officer had some questions for Vlok:

COURT	These matters are not appearing in court as yet?
VLOK	No, not yet.
COURT	The Johannesburg case, he is supposed to be a co-accused, along with the Portuguese lady?
VLOK	Yes, that is correct.
COURT	And also this one of Kempton Park as a co-accused?
VLOK	He is co-accused in the unlawful arrest as well as the one of Old Fashion Fish and Chips, yes that is correct.

The Presiding Officer had managed to get Vlok to verify his involvement in TWO cases, that were never proceeded with, although the military matter is now a charge against Vlok, by the State.

LAST, BUT BY NO MEANS LEAST

80

I interrupt the chronology, to go back in time to May 2016. I had received information, from a very reliable source, that Radovan Krejcir had telephoned Moonoo, from within prison and

E.M

advised Moonoo, that he wanted his R5million back, as he (Moonoo) had done nothing to get him (Krejcir) out of prison. Moonoo made it clear to Krejcir that his hands were tied and, with Paul O'Sullivan still alive, it would be nigh impossible for him (Moonoo) to get him out of prison. From within prison, Krejcir then hatched another plan to have me murdered. He made a promise of a large sum of money, to have me killed, but I must be killed very urgently. An undercover source of mine, who MUST remain nameless for his own protection, rumbled the conspiracy to have me murdered and supplied me with a sworn statement.

81

I cannot show that sworn statement, for risk of exposing my source. However, I took all the information the source provided me with and made my own sworn statement, with the intention to run a sting operation with the police. A copy of my sworn statement dated 2016-05-12, is attached hereto as **Annexure 'POS-14'**. The sting operation became urgent, when I heard that the planned murder of me, was imminent. As the person seeking my murder, a certain Gregory Mtimkulu, had been identified by me, as well as the location he was at, I went to Villieria Police Station in Pretoria, to request urgent assistance. I specifically did NOT go to Pretoria Central, because I knew that Moonoo had connections there. I pointed out to the police at Villieria that word of what was happening MUST NOT under any circumstances, get back to Moonoo, even though he had by then left the police. They asked me to wait there, and a 'team' would come to neutralise the threat against me.

82

I waited about an hour and was startled to see Vlok arrive along with his accomplices, to take over the conspiracy to commit murder case against me. Vlok then asked me to leave, and he would deal with the matter. I immediately knew that I would have to deal with the matter myself. I therefore tipped off some journalists, and also took on the task of making contact with he suspect by phoning him and sending him messages, to say he would face prison for conspiracy to commit murder. I thereby interrupted the plot to kill me, as I knew Vlok would do nothing.

83

From the above set of events and facts, it should be clear to any reader, that Vlok played an integral part in the monstrous crimes perpetrated against me, by corrupt elements of the criminal justice system. Many of those members, including Vlok, are on trial today for their role in fraud

E-M

and corruption. Despite police regulations making it very clear that a serving member who has been suspended pending disciplinary action, may NOT be processed on early pension for reason of what are commonly referred to as being 'Medically Boarded', Vlok was REWARDED for his crimes, by senior police officials, who broke the rules, to favour Vlok. As a result, Vlok currently enjoys his full pension, as if he had worked until his retirement age. He pulled off this fraud, by pretending to be suffering from psychological conditions, when his only 'condition' was the fear of losing his job and being sent to prison, if convicted of his crimes. As a result, he receives a full pension, yet there is nothing wrong with him. He also received FREE lawyers at the expense of the taxpayer, which lawyers have demonstrated nothing other than delaying tactics, right from FIVE years ago, when Vlok was first criminal charged. The Stalingrad tactics continue, and will continue, with repeated attempts at delaying his trial. I therefore request the State to stay strong and not give an inch, until Vlok has been brought to justice for his crimes. I therefore request a full investigation into the corruption at play, that led to Vlok being unlawfully boarded on full pension and getting free lawyers for his crimes.

84

Prior to me signing this statement, I have carefully read through it and am satisfied that the facts are correctly and accurately recorded. I know and understand the contents of this statement. I have no objection to taking the prescribed oath and I consider the prescribed oath to be binding on my conscience.

____

PAUL O'SULLIVAN

I certify that the deponent has acknowledged that he knows and understands the contents of this statement which was sworn to before me, and the deponent's signature was placed thereon in my presence at **GALLO MANOR** on the **FIFTH** day of **MAY 2024**.

____

COMMISSIONER OF OATHS

STAMP or WRITTEN NAME & ADDRESS of COMMISSIONER of OATHS

SOUTH AFRICAN POLICE SERVICE
CLIENT SERVICE CENTRE
SANDTON
2024 -05- 05
KLIENTE DIENSSENTRUM
SANDTON
SUID-AFRIKAANSE POLISIEDIENS

SUID-AFRIKAANSE POLISIEDIENS
KLIENTE DIENSSENTRUM
SANDTON
2024 -05- 05
CLIENT SERVICE CENTRE
SANDTON
SOUTH AFRICAN POLICE SERVICE