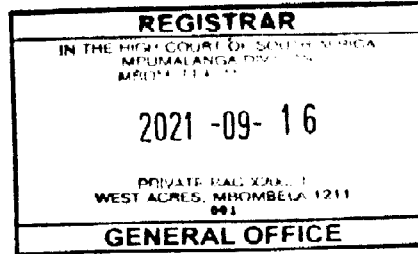


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**IN THE HIGH COURT OF SOUTH AFRICA
MPUMALANGA DIVISION MBOMBELA
(MAIN SEAT)**

CASE NO: 3577/2021



In the matter between:

REVIEW APPLICATION

JOHAN FRANCOIS LE ROUX

APPLICANT

and

THE SOUTH AFRICAN LEGAL PRACTICE COUNCIL:

MPUMALANGA PROVINCIAL COUNCIL

1ST RESPONDENT
~~applicant~~

RIAZ LORGAT

2nd RESPONDENT

DIRECTOR TO THE ~~applicant~~ 1ST RESPONDENT.

JOHANNES HENDRICKUS ROELOFSE

3rd RESPONDENT

RESPONDENT TO THE COMPLAINT

NOTICE IN TERMS OF RULE 16A

BE PLEASE TO TAKE NOTICE THAT the Applicant raise issues of great importance and of Constitutional in these matters and directly related intrinsically inextricably linked

pending matters in the Application for Eviction of the applicant (the applicant) in terms of the Prevention of Illegal Eviction and Unlawfully Occupation of Land Act 19 of 1998, under the above case number, seen together, collectively, cumulatively and pursuant / with the directly related intrinsically inextricably linked mostly pending matters under case numbers: 23344/08 & 44693/08 & 67261/2009 & 7248/10 & 36381/11 & 80754/2014 & 64/2026 & 916/2016 & 3312/2016 & 37474/16 & 38531/16 & 432/17 & 2857/17 & 710/18 & 2904/18 & 3508/19 & 3315/2020 as set out below.

A.

1. **PLEASE TAKE NOTICE THAT**, the applicant contends that in their attempt to **exercise or protection of their rights** and **to enable them to have access to courts / justice**, and that in their attempt of the **enforcement of their rights** and **to enable them to have access to courts / justice**, the Constitutional Rights in person, real rights and the right to property enshrined in the provisions as contemplated in sections 7, 8, 9, 25(1), 26(3), 32, 33, 34, 38, 39(2), 165, 172, 173 & 195 in the Constitution / Bill of Rights, of the applicant, his brother Mr. Pieter Daniël le Roux and their co-litigation parties / partners were (and still ongoing & threatened) adversely affected, grossly infringed, grossly violated, grossly and blatantly refused & denied & unlawfully arbitrarily deprived of, seen holistically in context and collectively & the material / substantial cumulative prejudicial effect thereof, which relates to *inter alia* in a chain of directly related intrinsically linked grossly tainted Administrative actions / Proceedings / Event, seen together with a chain of directly related intrinsically linked grossly tainted underlying Administrative actions / Proceedings / Events thereto, in directly related intrinsically linked matters under case numbers: 23344/08 & 44693/08 & 67261/2009 & 7248/10 &

36381/11 & 80754/2014 & 64/2026 & 916/2016 & 3312/2016 37474/16 & 38531/16 & 432/17 & 2857/17 & 710/18 & 2904/18 & 3508/19 & 3315/2020;

- 1.1. the unlawful arbitrary deprivation upon the fraudulent induced obtained through / by / with gross **JUDICIAL FRAUD & CORRUPTION** on the court, fraudulently and unlawfully colluded & consented to without any express nor implied instruction nor by law & contrary to the record, engineered, fabricated & manufactured, gross fraudulent & grossly tainted "**Default Summary Judgment**" under case number: 44693/08 against the Le Roux Group as sureties, obtained in the secret on the 06th of March 2009, *and*;

- 1.2. the unlawful arbitrary deprivation upon the gross fraudulently induced and obtained through / by / with gross **JUDICIAL FRAUD & CORRUPTION** on the court, fraudulently and unlawfully colluded & consented to without any express nor implied instruction nor by law & contrary to the record, engineered, fabricated & manufactured, gross fraudulent & grossly tainted "**Default Liquidation Order**" under case number: 23344/08, obtained in the secret on the 27th of March 2009, *and*;

- 1.3. the unlawful arbitrary deprivation upon the gross fraudulently induced and obtained through / by / with gross **JUDICIAL FRAUD & CORRUPTION** & colluded & rigged & manufactured, gross fraudulent & grossly tainted "**APPOINTMENT**" of, and with the gross fraudulently induced and obtained through / by / with gross **JUDICIAL FRAUD & CORRUPTION** & colluded & rigged & manufactured, gross fraudulent & grossly tainted "**ADMINISTRATION**" by the "**JOINT**

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LIQUIDATORS" and the **"MASTERS"** in Pretoria in / of the Magnolia liquidated estate, with the master's reference number: T1352/09, *and*;

1.4. the unlawful arbitrary deprivation upon the gross fraudulently induced and obtained through / by / with gross **JUDICIAL FRAUD & CORRUPTION** on the court, fraudulently and unlawfully colluded, engineered, fabricated & manufactured, gross fraudulent & grossly tainted **"RETURN OF SERVICE"** under case number: 67261/09 dated the 04th of November 2009 produced in the secret by the Sheriff for Nelspruit, Ms Charmaine Mabuza, *and*;

1.5. the unlawful arbitrary deprivation upon the gross fraudulently induced and obtained through / by / with gross **JUDICIAL FRAUD & CORRUPTION** on the court, fraudulently and unlawfully colluded, engineered, fabricated & manufactured, gross fraudulent & grossly tainted **"EX PARTE DEFAULT LIQUIDATION ORDERD"** under case number: 67261/09 handed down in the secret on the 18th of December 2009 by Judge NM Poswa, *and*;

1.6. the unlawful arbitrary deprivation upon the gross fraudulently induced and obtained through / by / with gross **JUDICIAL FRAUD & CORRUPTION** on the court, & colluded & rigged & engineered & manufactured, gross fraudulent & grossly tainted **"APPOINTMENT"** of, and with the gross fraudulently induced and obtained through / by / with gross **JUDICIAL FRAUD & CORRUPTION** on the court, & colluded & rigged & engineered & manufactured, gross fraudulent & grossly tainted **"ADMINISTRATION"** by the **"JOINT LIQUIDATORS"** and the **"MASTERS"**

in Pretoria in / of the Plaston Boerdery (CC) liquidated estate, with the master's reference number: T8323/09, *and*;

1.7. the unlawful arbitrary deprivation upon the gross fraudulently induced and obtained through / by / with gross **JUDICIAL FRAUD & CORRUPTION** on the court, colluded & engineered & rigged & manufactured, grossly tainted "**EX PARTE DEFAULT JUDGMENT**" under case numbers: 67261/09 & 36381/11 handed down on the 16th of September 2015 handed down by Judge Mabel Jansen, *and*;

1.8. the unlawful arbitrary deprivation upon the gross fraudulently induced and obtained through / by / with gross **JUDICIAL FRAUD & CORRUPTION** on the court, pre-judged grossly tainted "**LTA Judgment**" under case numbers: 67261/09 & 36381/11 handed down on the 11th of December 2015 by Judge Mabel Jansen received on the 15th of March 2016, *and*;

1.9. the unlawful arbitrary deprivation upon the gross fraudulently induced and obtained through / by / with gross **JUDICIAL FRAUD & CORRUPTION** & colluded & rigged & manufactured, gross fraudulent & grossly tainted purported "**PUBLIC AUCTION**" fraudulent induced & held & conducted of Plaston Boerdery CC (in liquidation) highly valuable immovable property – through / by / with gross **JUDICIAL FRAUD & THEFT**, fraudulently colluded, held and conducted on the 16th of March 2016 by Phil Minnaar Auctioneers CC Pretoria, *and*;

1.10. the unlawful arbitrarily deprivation upon the gross fraudulent, induced and obtained through / by / with gross **JUDICIAL FRAUD & CORRUPTION** &

colluded & rigged & manufactured, gross fraudulent & grossly tainted “**TRANSFERS**” on the 11th of May 2016 of the highly valuable immovable properties of Plaston Boerdery (CC) (In liquidation) in which the applicant and his brother Mr. Pieter Daniël le Roux are the **SOLE MEMBERS**, *and*;

1.11. the unlawful arbitrary deprivation upon the gross fraudulently induced and obtained through / by / with gross **JUDICIAL FRAUD & CORRUPTION** on the court, colluded & rigged & manufactured, gross fraudulent & grossly tainted “**COURT ORDER = SETTING ASIDE URGENT APPLICATION = PART A**” under case number: 37474/16 & (“**REVIEW APPLICATION**” under case number: 36381/2016 postponed *sine die*) postponing adjudication of the matter for the unlawful “**PUBLIC AUCTION**” *sine die* handed down on the 01st of July 2016 by Judge Peter Mabuze.

2. **PLEASE TAKE FURTHER NOTICE THAT**, the applicant contends that the Constitutional Rights in person, real rights and the right to property enshrined in the provisions as contemplated in sections 1(c), 7, 8, 9(1), 25(1), 26(3), 32, 33, 34, 38, 165, 172 & 195 in the Constitution / Bill of Rights, of the applicant, his brother Mr. Pieter Daniël le Roux and their co-litigation parties / partners were (and still ongoing) & (and threatened) adversely affected, grossly infringed, grossly violated, grossly and blatantly refused & denied & unlawfully arbitrarily deprived of, seen holistically in context and collectively & the material / substantial cumulative prejudicial effect thereof *inter alia* upon the following;

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- 2.1. upon the unlawful refusal / denial of the applicant, and his brother Mr. Pieter Daniël le Roux's Constitutional right to be treated equal before the law and the right to equal protection and benefit of the law, and;
- 2.2. upon the unlawful arbitrarily deprivation of highly the applicant, and his brother Mr. Pieter Daniël le Roux's Constitutional right to the highly valuable immovable properties of Plaston Boerdery (CC) (in liquidation) in which the applicant and his brother Mr. Pieter Daniël le Roux is the SOLE MEMBERS, and;
- 2.3. upon the unlawful arbitrarily deprivation of the applicant, and his brother Mr. Pieter Daniël le Roux's Constitutional right to their primary residence on the immovable property of Plaston Boerdery (CC) (in liquidation), and;
- 2.4. upon the unlawful refusal / denial of the applicant, and his brother Mr. Pieter Daniël le Roux's Constitutional right to access to information, and;
- 2.5. upon the unlawful refusal / denial of the applicant, and his brother Mr. Pieter Daniël le Roux's Constitutional right to administrative action that is lawful, reasonable and procedurally fair, and;
- 2.6. upon the unlawful refusal / denial of the applicant, and his brother Mr. Pieter Daniël le Roux's Constitutional right to be given written reasons, and;
- 2.7. upon the unlawful refusal / denial of the applicant, and his brother Mr. Pieter Daniël le Roux's Constitutional right to access to courts, for the applicant, his brother Mr.

Pieter Daniël le Roux and their co-litigation parties / partners to have any dispute that can be resolved by the application of law decided in a fair hearing before a court, and;

2.8. upon the unlawful refusal / denial of in the applicant, his brother Mr. Pieter Daniël le Roux and their co-litigation parties / partners in their attempt to **exercise or protection of their rights** and **to enable them to have access to courts / justice**, their Constitutional Rights in person, real rights and the rights to property were (and still ongoing) & (and threatened) adversely affected, grossly infringed, grossly violated, grossly and blatantly refused & denied & unlawfully arbitrarily deprived of in directly related intrinsically linked matters under case numbers: 23344/08 & 44693/08 & 67261/09 & 7248/10 & 36381/11 & 80754/2014 & 64/2026 & 916/2016 & 3312/2016 37474/16 & 38531/16 & 432/17 & 2857/17 & 710/18 & 2904/18 & 3508/19 & 3315/2020.

3. **PLEASE TAKE FURTHER NOTICE THAT**, the applicant contends that the Constitutional Rights in person, real rights and the right to property enshrined in the provisions as contemplated in sections 1(c), 7, 8, 9(1), 25(1), 26(3), 32, 33, 34, 38, 39(2), 165, 172 & 195 in the Constitution / Bill of Rights, of the applicant, his brother Mr. Pieter Daniël le Roux and their co-litigation parties / partners were (and still ongoing) & (and threatened) adversely affected, grossly infringed, grossly violated, grossly and blatantly refused & denied & unlawfully arbitrarily deprived of, seen holistically in context and collectively & the material / substantial cumulative prejudicial effect thereof *inter alia* upon the following;

- 3.1. upon the unlawful refusal / denial of the applicant, and his brother Mr. Pieter Daniël le Roux's Constitutional right to be treated equal before the law and the right to equal protection and benefit of the law, and;
- 3.2. upon the unlawful arbitrarily deprivation of the applicant, and his brother Mr. Pieter Daniël le Roux's Constitutional right to the highly valuable immovable properties of Plaston Boerdery (CC) (In liquidation) in which the applicant and his brother Mr. Pieter Daniël le Roux is the SOLE MEMBERS, and;
- 3.3. upon the unlawful arbitrarily deprivation of the applicant, and his brother Mr. Pieter Daniël le Roux's Constitutional right to his primary residence on the immovable property of Plaston Boerdery (CC) (In liquidation), and;
- 3.4. upon the unlawful refusal / denial of the applicant, and his brother Mr. Pieter Daniël le Roux's Constitutional right to access to information, and;
- 3.5. upon the unlawful refusal / denial of the applicant, and his brother Mr. Pieter Daniël le Roux's Constitutional right to administrative action that is lawful, reasonable and procedurally fair, and;
- 3.6. upon the unlawful refusal / denial of the applicant, and his brother Mr. Pieter Daniël le Roux's Constitutional right to be given written reasons, and;
- 3.7. upon the unlawful refusal / denial of the applicant, and his brother Mr. Pieter Daniël le Roux's Constitutional right to access to courts, for the applicant, his brother Mr.

Pieter Daniël le Roux and their co-litigation parties / partners to have any dispute that can be resolved by the application of law decided in a fair hearing before a court, and;

3.8. upon the unlawful refusal / denial of the applicant, his brother Mr. Pieter Daniël le Roux and their co-litigation parties / partners in their attempt of the **enforcement of their rights** and **to enable them to have access to courts / justice**, their Constitutional Rights in person, real rights and the rights to property were (and still ongoing) & (and threatened) adversely affected, grossly infringed, grossly violated, grossly and blatantly refused & denied & unlawfully arbitrarily deprived of, in directly related intrinsically linked matters under case numbers: 23344/08 & 44693/08 & 67261/09 & 7248/10 & 36381/11 & 80754/2014 & 64/2026 & 916/2016 & 3312/2016 37474/16 & 38531/16 & 432/17 & 2857/17 & 710/18 & 2904/18 & 3508/19 & 3315/2020.

B.

4. PLEASE TAKE FURTHER NOTICE THAT, the applicant contends that in their attempt to **exercise or protection of their rights** and **to enable them to have access to courts / justice**, and that in their attempt of the **enforcement of their rights** and **to enable them to have access to courts / justice**, the Constitutional Rights in person, real rights and the right to property enshrined in the provisions as contemplated in sections 1(c), 7, 8, 9(1), 25(1), 26(3), 32, 33, 34, 38, 39(2), 165, 172, 173 & 195 in the Constitution / Bill of Rights, of the applicant, his brother Mr. Pieter Daniël le Roux and their co-litigation parties / partners were (and still ongoing) & (and threatened) adversely

affected, grossly infringed, grossly violated, grossly and blatantly refused & denied & unlawfully arbitrarily deprived of, seen holistically in context and collectively & the material / substantial cumulative prejudicial effect thereof, which relates to *inter alia* the following chain of directly related intrinsically linked grossly tainted Administrative actions / Proceedings / Events, seen together with a chain of directly related intrinsically linked grossly tainted underlying Administrative actions / Proceedings / Events thereto, in directly related intrinsically linked matters under case numbers: 23344/08 & 44693/08 & 67261/09 & 7248/10 & 36381/11 & 80754/2014 & 64/2026 & 916/2016 & 3312/2016 37474/16 & 38531/16 & 432/17 & 2857/17 & 710/18 & 2904/18 & 3508/19;

4.1. the unlawful arbitrary deprivation upon the gross fraudulent misrepresentation by commission & omission induced and obtained of the gross fraudulent manipulated in the secret “**Enrolment**” and “**set down**” in an Application for a grossly tainted “DEFAULT JUDGMENT” under case number: 64/2016 on the 19th of July 2016 in an “open court of law”, *and*;

4.2. the unlawful arbitrary deprivation upon the gross fraudulently misleading induced and obtained of the gross fraudulent & grossly tainted manipulated in the secret grossly tainted “**Enrolment**” and “**set down**” for a “**PRE-TRAIL CONFERENCE**” under case number: 64/2016 on the 24th of October 2016 in an “open court of law”, without any discovery, *and*;

4.3. the unlawful arbitrary deprivation upon the gross fraudulently misleading, fake, falsified, forged grossly tainted purported “**COURT ORDER**” gross fraudulently “**induced**” and “**issued**” and “**obtained**” on the 21st of November 2016 of a grossly

tainted "**COURT ORDER**" under case number: 64/2016 handed down on the 15th of November 2016 in an "open court of law" before the Honourable Acting Judge SA Thobane, *and;*

4.4. the unlawful arbitrary deprivation upon the gross fraudulently misleading induced and obtained of the gross fraudulent manipulated in the secret grossly tainted in the secret grossly tainted "**Enrolment**" and "**set down**" for a "**PRE-TRAIL CONFERENCE**" on the 21st / 22nd of November 2016 before the Honourable Acting Judge SA Thobane, through / by / with gross **JUDICIAL FRAUD & CORRUPTION** & gross fraudulent misrepresentation by *commission & omission*, resulted colluded & rigged & manufactured, gross fraudulently induced & obtained & grossly tainted "**Default Certified Trial Ready – Court Order**" under case number: 64/2016 handed down on the 22nd of November 2016 by Acting Judge SA Thobane, without any discovery by the plaintiff, without any pre-trial conference been held, without any pre-trial minutes been filed, *and;*

4.5. the unlawful arbitrary deprivation upon the gross fraudulently induced and obtained through / by / with gross **JUDICIAL FRAUD & CORRUPTION** on the court, & colluded & rigged & manufactured, in the secret grossly tainted "**Enrolment**", gross fraudulently induced & obtained & grossly tainted "**LTA Judgment / Order**" under case number: 64/2016 handed down on the 17th of November 2017 by Acting Judge SA Thobane, *and;*

4.6. the unlawful arbitrary deprivation upon the gross fraudulently misleading induced and obtained, pursuant to the above chain of gross judicial fraud, corruption &

racketeering, with a gross fraudulently induced & obtained & grossly tainted "ENROLMENT" and "set down" for a "TRAIL PROCEEDINGS" under case number: 64/2016 on the 25th of May 2017 in an "open court of law", without any discovery by the plaintiff, without any pre-trial conference been held, without any pre-trial minutes been filed, *and*;

4.7. the unlawful arbitrary deprivation upon the gross fraudulently induced and obtained through / by / with gross fraudulently induced & obtained & grossly tainted "COURT PROCEEDINGS" & with gross fraudulent misrepresentation by *commission & omission* on the court, a colluded & fraudulently negotiated unlawfully consented to without any express nor implied instruction thereto nor supported by law inconsistent and contrary to explicit instruction and facts to the record, pursuant to the above chain of gross judicial fraud, corruption & racketeering, with a gross fraudulently induced & obtained & grossly tainted "ANTI-DISSIPATION ORDER" under case number: 64/2016 handed down on the 25th of May 2017 by Judge W Hughes, pursuant to the above chain of gross judicial fraud, corruption & racketeering, with 1751 pages of discovery documents 1 court day before the purported "trial" delivered by the plaintiff, without rule 35(3) discovery by the plaintiff, without any pre-trial conference been held, without any pre-trial minutes been filed, without any pre-trial conference been held, without any pre-trial minutes been filed, *and*;

4.8. the unlawful arbitrary deprivation upon the gross fraudulently induced and obtained through / by / with pursuant to the above chain of gross judicial fraud, corruption & racketeering, with a gross fraudulently induced & obtained & grossly tainted "EX

PARTE DEFAULT JUDGMENT & ORDER” handed down on the 11th & 13th of December 2017 under case number: 64/2016 by Acting Judge Desmond Nair, *and*;

4.9. the unlawful arbitrary deprivation upon the gross fraudulently induced and obtained through / by / with pursuant to the above chain of gross judicial fraud, corruption & racketeering, with a gross fraudulently induced & obtained & grossly tainted “**Ex Tempore LTA Order**” under case number: 64/2016 handed down on the 13th of April 2018 by Acting Judge Desmond Nair, whilst presiding over a sanitised grossly tainted purported “court file”, *and*;

4.10. the unlawful arbitrary deprivation upon the gross fraudulently induced & obtained & grossly tainted purported “**PURCHASE / ACQUIRING AGREEMENT/S**” of the gross fraudulently induced and obtained through / by / with gross **JUDICIAL FRAUD & CORRUPTION** & colluded & rigged & manufactured, gross fraudulently induced & obtained & tainted purported “**PUBLIC AUCTION**” – through / by / with gross **JUDICIAL FRAUD & THEFT**, gross fraudulently colluded & induced & held & conducted on the 23rd of November 2018 by the Sheriff for White River & Nskizi Mr. HAT(Henry) Myers of me and my brother Mr. Pieter Daniël le Roux’s 50% each MEMBERSHIP held in Delkop Boerdery Beleggings CC (Reg. No. 1989/015059/23) the holder of highly valuable immovable property, *and*;

4.10.1. the unlawful arbitrary deprivation upon the colluded & rigged & manufactured, gross fraudulently induced & obtained & tainted purported “**SALE IN EXECUTION**” per colluded & rigged & manufactured, gross

fraudulently induced & obtained & tainted purported “PUBLIC AUCTION”
induced & held & conducted by The Sheriff for White River & Nsikazi on the
23rd of November 2018 of me and my brother Mr. Pieter Daniël le Roux’s “50%
each MEMBERSHIP” held in Delkop Boerdery Beleggings CC (Reg. No.
1989/015059/23), and to our right to our “**IMMOVABLE PROPERTY**” of
Delkop Boerdery Beleggings CC (Reg. No. 1989/015059/23), *and;*

4.10.2. the unlawful arbitrary deprivation upon on the 23rd of November 2018 of me
and my brother Mr. Pieter Daniël le Roux’s “**PRIMARY RESIDENCE**” on the
immovable property of Delkop Boerdery Beleggings CC (Reg. No.
1989/015059/23), *and;*

4.11. the unlawful arbitrary deprivation upon the gross fraudulently induced &
obtained & grossly tainted “TRANSFER” on the 14th of February 2019 of me and
my brother Mr. Pieter Daniël le Roux’s 50% **each MEMBERSHIP** held in Delkop
Boerdery Beleggings CC (Reg. No. 1989/015059/23), *and;*

4.12. the unlawful arbitrary deprivation upon the gross fraudulently induced &
obtained & grossly tainted purported “PURCHASE / ACQUIRING
AGREEMENT/S” on the 19th of March 2018 of the highly valuable immovable
property of Delkop Boerdery Beleggings CC (Reg. No. 1989/015059/23), *and;*

4.13. the unlawful arbitrary deprivation upon the gross fraudulently induced &
obtained & grossly tainted “TRANSFERS” & “REGISTRATION” on the 19th July

2019 of the highly valuable immovable property of Delkop Boerdery Beleggings CC (Reg. No. 1989/015059/23), *and*;

4.14. the unlawful arbitrary deprivation upon the gross fraudulently induced and obtained through / by / with gross fraudulently induced & obtained & grossly tainted **“COURT PROCEEDINGS”** & with gross fraudulent misrepresentation by *commission & omission* on the court, resulted gross fraudulently induced & obtained & grossly tainted **“NOTICE IN TERMS OF SECTION 4(2) OF THE PREVENTION OF ILLEGAL EVICTION FROM AN UNLAWFUL OCCUPATION OF LAND ACT 19 OF 1998 COURT ORDER”** under case number: 3508/2019 handed down on the 22nd of November 2018 by Judge Mashile, *and*;

4.15. the unlawful arbitrary deprivation upon the gross fraudulently induced & obtained & grossly tainted *mula fide* **“EVICTION APPLICATION** of the applicant = **Application for Eviction of the applicant in terms of the Prevention of Illegal Eviction and Unlawfully Occupation of Land Act 19 of 1998”** under case number: 3508/2019 served on the 26th of November 2019, *and*;

4.16. the arbitrary and irrational and unlawful *“decision”, “finding”, “recommendation”* by an “Investigating Committee” of the LPC Mpumalanga Provincial Council and/or the LPC Mpumalanga Provincial Council and/or Mr Riaz Lorgat the Director for the LPC Mpumalanga Provincial Council made on/or about the 08th of October 2020 in the matter under REF: 12762020/MS

MABUDUSHA/(MM) as furthermore set out in the LPC's Mpumalanga Provincial Council letter dated the 27th of October 2020, *and*;

4.17. the arbitrary and irrational and unlawful "*decision*", "*finding*", "*recommendation*" by an "Managing Committee" of the LPC Mpumalanga Provincial Council and/or the LPC Mpumalanga Provincial Council and/or Mr Riaz Lorgat the Director for the LPC Mpumalanga Provincial Council made on/or about the 31st of March 2021 as furthermore set out in the LPC's Mpumalanga Provincial Council and/or Mr Riaz's email dated the 06th of April 2021, *and*;

4.18. the unlawful arbitrary deprivation upon the gross fraudulently misleading induced and obtained of the gross fraudulently induced & obtained & grossly tainted "**ENROLMENT**" and "**NOTICE OF SET DOWN UNOPPOSED ROLL**" for an "**Application for Eviction of the applicant in terms of the Prevention of Illegal Eviction and Unlawfully Occupation of Land Act 19 of 1998**" under case number: 3508/2019 on the 12th of April 2021 in an "open court of law", *and*;

4.19. the unlawful arbitrary deprivation upon the gross fraudulently induced and obtained through / by / with gross fraudulently induced & obtained & grossly tainted "**EX PARTE CLOSED ZOOM COURT PROCEEDINGS**" & with gross fraudulent misrepresentation by *commission & omission* on the court, resulted gross fraudulently induced & obtained & grossly tainted "**EX PARTE / DEFAULT JUDGMENT & EX PARTE / DEFAULT EVICTION COURT ORDER**" under case number: 3508/2019 handed down on the 12th of April 2021 by Judge Mashile.

5. PLEASE TAKE FURTHER NOTICE THAT, the applicant contends that the Constitutional Rights in person, real rights and the right to property enshrined in the provisions as contemplated in sections 1(c), 7, 8, 9(1), 25(1), 26(3), 32, 33, 34, 38, 165, 172, 173 & 195 in the Constitution / Bill of Rights, of the applicant, his brother Mr. Pieter Daniël le Roux and their co-litigation parties / partners were (and still ongoing) & (and threatened) adversely affected, grossly infringed, grossly violated, grossly and blatantly refused & denied & unlawfully arbitrarily deprived of, seen holistically in context and collectively & the material / substantial cumulative prejudicial effect thereof *inter alia* upon the following;

- 5.1. upon the unlawful refusal / denial of the applicant, and his brother Mr. Pieter Daniël le Roux's Constitutional right to be treated equal before the law and the right to equal protection and benefit of the law, *and*;
- 5.2. upon the unlawful arbitrarily deprivation of the applicant, and his brother Mr. Pieter Daniël le Roux's Constitutional right to the highly valuable property of the applicant and his brother Mr. Pieter Daniël le Roux's MEMBERSHIP INTEREST held in Delkop Boerdery Beleggings CC (Reg. No. 1989/015059/23), *and*;
- 5.3. upon the unlawful arbitrarily deprivation of highly the applicant, and his brother Mr. Pieter Daniël le Roux's Constitutional right to the highly valuable immovable properties of Delkop Boerdery Beleggings CC (Reg. No. 1989/015059/23) in which the applicant and his brother Mr. Pieter Daniël le Roux is the SOLE MEMBERS, *and*;

- 5.4. upon the unlawful arbitrarily deprivation of the applicant, and his brother Mr. Pieter Daniël le Roux's Constitutional right to their primary residence on the immovable property of Delkop Boerdery Beleggings CC (Reg. No. 1989/015059/23), *and*;
- 5.5. upon the unlawful refusal / denial of the applicant, and his brother Mr. Pieter Daniël le Roux's Constitutional right to access to information, *and*;
- 5.6. upon the unlawful refusal / denial of the applicant, and his brother Mr. Pieter Daniël le Roux's Constitutional right to administrative action that is lawful, reasonable and procedurally fair, *and*;
- 5.7. upon the unlawful refusal / denial of the applicant, and his brother Mr. Pieter Daniël le Roux's Constitutional right to be given written reasons, *and*;
- 5.8. upon the unlawful refusal / denial of the right the applicant, and his brother Mr. Pieter Daniël le Roux's Constitutional right to access to courts, for the applicant and their co-litigation parties / partners to have any dispute that can be resolved by the application of law decided in a fair hearing before a court, *and*;
- 5.9. upon the unlawful refusal / denial of the applicant, his brother Mr. Pieter Daniël le Roux and their co-litigation parties / partners in their attempt to **exercise or protection of their rights** and **to enable them to have access to courts / justice**, their Constitutional Rights in person, real rights and the rights to property were (and still ongoing) & (and threatened) adversely affected, grossly infringed, grossly violated, grossly and blatantly refused & denied & unlawfully arbitrarily deprived of,

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in directly related intrinsically linked matters under case numbers: 23344/08 & 44693/08 & 67261/09 & 7248/10 & 36381/11 & 80754/2014 & 64/2026 & 916/2016 & 3312/2016 37474/16 & 38531/16 & 432/17 & 2857/17 & 710/18 & 2904/18 & 3508/19 & 3315/2020.

6. PLEASE TAKE FURTHER NOTICE THAT, the applicant contends that the Constitutional Rights in person, real rights and the right to property enshrined in the provisions as contemplated in sections 1(c), 7, 8, 9(1), 25(1), 26(3), 32, 33, 34, 38, 39(2), 165, 172, 173 & 195 in the Constitution / Bill of Rights, of the applicant, his brother Mr. Pieter Daniël le Roux and their co-litigation parties / partners were (and still ongoing) & (and threatened) adversely affected, grossly infringed, grossly violated, grossly and blatantly refused & denied & unlawfully arbitrarily deprived of, seen holistically in context and collectively & the material / substantial cumulative prejudicial effect thereof *inter alia* upon the following;

6.1. upon the unlawful refusal / denial of the applicant, and his brother Mr. Pieter Daniël le Roux's Constitutional right to be treated equal before the law and the right to equal protection and benefit of the law, *and*;

6.2. upon the unlawful arbitrarily deprivation of the applicant, and his brother Mr. Pieter Daniël le Roux's Constitutional right to the highly valuable property of the applicant and his brother Mr. Pieter Daniël le Roux's MEMBERSHIP INTEREST held in Delkop Boerdery Beleggings CC (Reg. No. 1989/015059/23), *and*;

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- 6.3. upon the unlawful arbitrarily deprivation of the applicant, and his brother Mr. Pieter Daniël le Roux's Constitutional right to the highly valuable immovable properties of Delkop Boerdery Beleggings CC (Reg. No. 1989/015059/23) in which the applicant and his brother is the SOLE MEMBERS, *and;*
- 6.4. upon the unlawful arbitrarily deprivation of the applicant, and his brothers Mr. Pieter Daniël le Roux Constitutional right to their primary residence on the immovable property of Delkop Boerdery Beleggings CC (Reg. No. 1989/015059/23), *and;*
- 6.5. upon the unlawful refusal / denial of the applicant, and his brother Mr. Pieter Daniël le Roux's Constitutional right to access to information, *and;*
- 6.6. upon the unlawful refusal / denial of the applicant, and his brother Mr. Pieter Daniël le Roux's Constitutional right to administrative action that is lawful, reasonable and procedurally fair, *and;*
- 6.7. upon the unlawful refusal / denial of the applicant, and his brother Mr. Pieter Daniël le Roux's Constitutional right to be given written reasons, *and;*
- 6.8. upon the unlawful refusal / denial of the applicant, and his brother Mr. Pieter Daniël le Roux's Constitutional right to access to courts, for the applicant and their co-litigation parties / partners to have any dispute that can be resolved by the application of law decided in a fair hearing before a court, *and;*

- 6.9. upon the unlawful refusal / denial of the applicant, his brother Mr. Pieter Daniël le Roux and their co-litigation parties / partners in their attempt of the **enforcement of their rights** and **to enable them to have access to courts / justice**, their Constitutional Rights in person, real rights and the rights to property were (and still ongoing) & (and threatened) adversely affected, grossly infringed, grossly violated, grossly and blatantly refused & denied & unlawfully arbitrarily deprived of, in directly related intrinsically linked matters under case numbers: 23344/08 & 44693/08 & 67261/09 & 7248/10 & 36381/11 & 80754/2014 & 64/2026 & 916/2016 & 3312/2016 37474/16 & 38531/16 & 432/17 & 2857/17 & 710/18 & 2904/18 & 3508/19 & 3315/2020.
7. **PLEASE TAKE FURTHER NOTICE THAT**, the applicant contends that in their attempt to **exercise or protection of their rights** and **to enable them to have access to courts / justice**, and that in their attempt of the **enforcement of their rights** and **to enable them to have access to courts / justice**, the Constitutional Rights in person, real rights and the right to property enshrined in the provisions as contemplated in sections 1(c), 7, 8, 9(1), 25(1), 26(3), 32, 33, 34, 38, 39(2), 165, 172, 173 & 195 in the Constitution / Bill of Rights, of the applicant, his brother Mr. Pieter Daniël le Roux and their co-litigation partners / parties were (and still ongoing) & (and threatened) adversely affected, grossly infringed, grossly violated, grossly and blatantly refused & denied & unlawfully arbitrarily deprived of, and by having regard to what have been set out above, seen holistically in context and collectively & the material / substantial cumulative prejudicial effect thereof, which relates to *inter alia* upon the following list of a continuous / ongoing pattern of gross abuse of power, gross judicial fraud, gross abuse of process, gross fraudulent procedural manipulations, gross fraudulent procedural

irregularities and gross unlawfulness within / by / through the JUDICIAL SYSTEM and its structures / machinery (which is NOT a FULL, NOR comprehensive / exhaustive list), the a chain of directly related intrinsically linked grossly tainted Administrative actions / Proceedings / Event, seen together with a chain of directly related intrinsically linked grossly tainted underlying Administrative actions / Proceedings / Events thereto, in directly related intrinsically linked matters under case numbers: 23344/08 & 44693/08 & 67261/09 & 7248/10 & 36381/11 & 80754/2014 & 64/2026 & 916/2016 & 3312/2016 & 37474/16 & 38531/16 & 432/17 & 2857/17 & 710/18 & 2904/18 & 3508/19 & 3315/2020:

- 7.1. Constitute gross corrupting of justice that constitute the capturing of justice, by organised crime syndicates operating out / in / through / with the court and its structures / by judicial officers / officers / officials of the court, *and*;
- 7.2. Constitute gross judicial fraud on the court by judicial officers / officers / officials of the court, *and*;
- 7.3. Constitute gross judicial corruption on the court by judicial officers / officers / officials of the court, *and*;
- 7.4. Constitute gross judicial racketeering on the court by judicial officers / officers / officials of the court, *and*;
- 7.5. Constitute the perverting and obstruction of the administration / course of justice by judicial officers / officers / officials of the court, *and*;

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- 7.6. Constitute the denial of our Constitutional right to be treated equal before the law and the right to equal protection and benefit of the law by the court and its structures / judicial officers / officers / officials of the court, *and*;
- 7.7. Constitute the denial of our Constitutional right of no interference with the functioning of the court by the court / the court's structures / judicial officers / officers / officials of the court, *and*;
- 7.8. Constitute the denial of our Constitutional right of access to information that is required for the exercise or protection of any of our rights by judicial officers / officers / officials of the court, *and*;
- 7.9. Constitute the denial of our Constitutional right to administrative action that is lawful, reasonable and procedurally fair by judicial officers / officers / officials of the court, *and*;
- 7.10. Constitute the denial of our Constitutional right to be given written reasons where our rights have been adversely affected by administrative action by judicial officers / officers / officials of the court, *and*;
- 7.11. Constitute denial of our Constitutional right of access to courts / justice by judicial officers / officers / officials of the court, *and*;

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- 7.12. Constitute denial of our Constitutional right to have a dispute that can be resolved by the application of law decided in a fair public hearing before a court by judicial officers / officers / officials of the court, and;
- 7.13. Constitute denial of our Constitutional rights to exercise or protection of all / any of our rights by judicial officers / officers / officials of the court, and;
- 7.14. Constitute denial of our Constitutional right of the enforcement of our Constitutional rights in person, real rights and property that have been (and still ongoing & threatened) adversely affected, grossly infringed and grossly violated by officers / officials of the court, and;
- 7.15. **The above 14 points are pursuant to *inter alia* the following:**
- 7.16. The gross judicial fraud by officers / officials of the court on the court by fraudulent affidavits, gross fraudulent misrepresentation by *commission and omission* on the court, *and;*
- 7.17. The gross fraudulent procedural interference with the functioning of the courts by officers / officials of the court, *and;*
- 7.18. The gross fraudulent procedural manipulation of enrolment of matters by officers / officials of the court, *and;*

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- 7.19. The gross fraudulent procedural manipulation of set down of matters by officers / officials of the court, *and*;
- 7.20. The gross fraudulent procedural manipulation by *inter alia* delaying, stalling, playing possum, frustrating, obstructive, manipulation, victimization, judicial cover-up, intimidation and harassment tactics of gross injustices also in LTA Proceedings / procedures by officers / officials of the court and the court's structures, *and*;
- 7.21. The gross fraudulent procedural manipulation of requests pertaining to the making the "Court File" available by officers / officials of the court, *and*;
- 7.22. The gross fraudulent procedural manipulation of tampering / meddling / sanitizing with / of the content of the "Court Files" by officers / officials of the court, *and*;
- 7.23. The gross fraudulent procedural manipulation of filing and / or denying of filing of papers onto and / or removing papers from the "COURT FILE" by officers / officials of the court, *and*;
- 7.24. The gross fraudulent procedural manipulation of the content of the "Court Files" made available to the presiding officers by officers / officials of the court, *and*;
- 7.25. The gross fraudulent procedural manipulation of requests pertaining to the making cd's / audio's available for transcripts of the record of proceedings by officers / officials of the court, *and*;

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- 7.26. The gross fraudulent procedural manipulation of requests refused pertaining to the long overdue as well as long outstanding duly and properly requested *bona fide* REQUESTS for access to COURT FILES, by officers / officials of the court, and;
- 7.27. The gross fraudulent procedural manipulation of requests refused pertaining to the long overdue as well as long outstanding duly and properly requested *bona fide* REQUESTS for TRANSCRIPTS of the RECORD of several PROCEEDINGS, by court by officers / officials of the court, and;
- 7.28. The gross fraudulent procedural manipulation of requests refused pertaining to the long overdue as well as long outstanding duly and properly served and filed *bona fide* NOTICES for FULL WRITTEN REASONS for JUDGMENTS / ORDERS handed down, by officers / officials of the court, and;
- 7.29. The gross fraudulent procedural manipulation of requests refused pertaining to the long overdue as well as long outstanding proper *bona fide* REQUESTS for REVISED & SIGNED JUDGMENTS for EX TEMPORE JUDGMENTS / ORDERS handed down, by officers / officials of the court, and;
- 7.30. The gross fraudulent procedural manipulation of requests refused pertaining to long overdue as well as long outstanding duly and properly served and filed *bona fide* NOTICES for APPLICATIONS FOR LEAVE TO APPEAL, by officers / officials of the court, and;

7.31. The gross fraudulent falsifying / forging / manufacturing / altering and / or unsigned handwritten "DRAFT ORDERS" made "ORDERS" by the court and by officers / officials of the court, *and*;

7.32. The factual evidence of gross fraudulent / corrupt induced & obtained, falsified / fake / forged / altered without any signature, grossly tainted JUDGMENTS / ORDERS handed down by judicial officers / officials of the court sanctioning, condoning and encouraging of these GROSS INJUSTICES & GROSS JUDICIAL FRAUD by officers / officials of the court on the court, *and*;

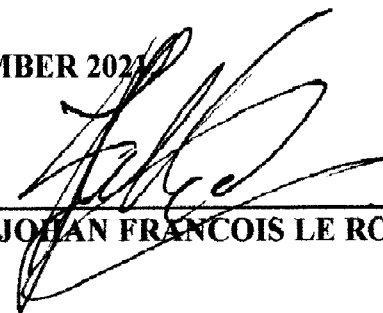
7.33. The factual evidence pertaining to *inter alia* the GROSS INJUSTICES & GROSS JUDICIAL FRAUD by officers / officials of the court on the court, with the massive negative and prejudicial effects thereof, the massive and gross cumulative prejudicial and adverse effects of *inter alia*; gross injustices, gross massive / major & substantial prejudicial effect, substantial & major damages, substantial & major losses, severe pain and suffering hereof by / on the applicant, his brother Mr. Pieter Daniël le Roux and their co-litigation partners / parties.

PLEASE TAKE FURTHER NOTICE THAT, any party interested in the abovementioned Constitutional issues may, with the written consent of all the parties to the proceedings, given by no later than twenty (20) days after the posting of this notice, be admitted to these proceedings as *amicus curiae*, upon such terms and conditions as may be agreed upon in writing by the parties.

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TO THE REGISTRAR, KINDLY place this notice on a board designated for the purpose recorded in Rule 16A(1)(c), and place your date stamp upon the notice to indicate the date upon which it is placed on the notice board in accordance with Rule 16A(1)(d), which notice shall remain on the notice board for a period of 20 days.

SIGNED at MBOMBELA on the 15th DAY OF SEPTEMBER 2021



JOHAN FRANCOIS LE ROUX

Obo the APPLICANT

Farm Skoukop
KMIA Road
White River
MPUMALANGA PROVINCE
Tel: 073 406 6792

Email: johanleroux@mweb.co.za

TO:

**REGISTRAR OF THE MPUMALANGA HIGH COURT
MBOMBELA (MAIN SEAT)**

Email: MMasekoeng@judiciary.org.za

Email: MNhlape@judiciary.org.za

Email: PCoko@judiciary.org.za

FILED BY HAND ON THE 17th OF SEPTEMBER 2021

AND TO:

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THE 1st RESPONDENT

THE SOUTH AFRICAN LEGAL PRACTICE COUNCIL

MPUMALANGA PROVINCIAL COUNCIL

BELL TOWERS

18 Bell Street / Nelspruit / 1200

Tel: 017 200 2487

Email: info@lpc.org.za

Email: MotlatsiM@lpc.org.za

Email: RiazL@lpc.org.za

REF: 12762020/MS MABUDUSHA/(MM)

LEGAL PRACTICE COUNCIL

2021-09-17

MPUMALANGA PROVINCIAL OFFICE

SIGNATURE: JS

08437

DELIVERED / SERVED BY HAND ON THE 17th OF SEPTEMBER 2021

AND TO:

THE 2nd RESPONDENT

MR RIAZ LORGAT,

THE DIRECTOR FOR THE SOUTH AFRICAN LEGAL PRACTICE COUNCIL

MPUMALANGA PROVINCIAL COUNCIL

BELL TOWERS

18 Bell Street / Nelspruit / 1200

Tel: 017 200 2487

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Email: RiazL@lpc.org.za

REF: 12762020/MS MABUDUSHA/(MM)

LEGAL PRACTICE COUNCIL

2021-09-17

MPUMALANGA PROVINCIAL OFFICE

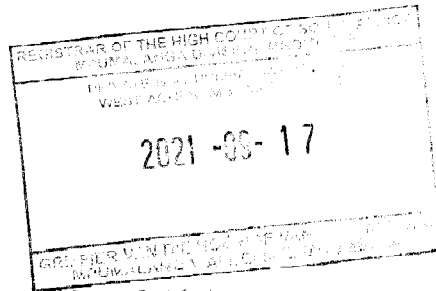
SIGNATURE: JS

08437

DELIVERED / SERVED BY HAND ON THE 17th OF SEPTEMBER 2021

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AND TO:



THE 3rd RESPONDENT

JOHANNES HENDRICKUS ROELOFSE

RESPONDENT TO THE COMPLAINT

**THE HIGH COURT OF SOUTH AFRICA,
MPUMALANGA DIVISION MBOMBELA (MAIN SEAT)**

Samora Machel Drive, Mbombela, 1200

Private Bag X 20051, West Acres, Mbombela, 1200

Tel: 084 605 2222

Tel: +27 13 753 0000

Acting Judge's Secretary: Nkosana Khitsane

Email: N.Khutsane@judiciary.org.za

DELIVERED / SERVED BY HAND ON THE 17th OF SEPTEMBER 2021