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ANNEXURE 'G'
IN THE MAGISTRATES' COURT FOR THE DISTRICT OF RANDBURG
held at Randburg (civil)

Case No. 475/2016

In the matter between:
PAUL ANTHONY MULLON

and
ANTHONY BEAMISH

PLACES BY CLERK OF THE COURT
2016-07-01
CLERK OF THE COURT 9/31/2016

Applicant

Respondent

RETURN: SERVICE OF NOTICE TO SHOW CAUSE

IT IS HEREBY CERTIFIED:

That on 20 June 2016 at 13h49 at COMBINED ARTISTIC PRODUCTIONS CC, TULBACH NORTH, 369 OAK AVENUE, RANDBURG being the respondent's place of employment a copy of the NOTICE TO SHOW CAUSE, SECTION 3(4) OF THE PROTECTION FROM HARASSMENT ACT, 2011 (ACT NO. 17 OF 2011) was served to ANTHONY BEAMISH personally after the original document was displayed and the nature and contents thereof explained to him, Rule 9(3)(a).

Court Date: 04 July 2016

SHERIFF CHARGES/EXPENSES: (You may require that this account be taxed and vouched before payment)

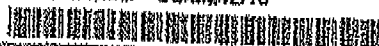
Description	Tarif	QTY	Amount	Description	Tarif	QTY	Amount
Service 100-40 Km	35.00	1	35.00				
Cellular call	7.00	1	7.00				
Cellular actual costs	3.00	2	6.00				
After hours or urgent service	70.00	1	70.00				
Registration & Return	22.00	1	22.00				
Document Returned	8.00	1	8.00				
Travelling	5.00	6	30.00				

TO: THE CLERK OF THE COURT Randburg

Zero rated items	0.00
Sub-total	178.00
VAT	24.92
Total	202.92

Account No.: R11451
TO: GERHARD BOTHA ATTORNEYS
Dx - 23 PARKTOWN

Your Reference: GB/M242/16



B. Chambers
MS BIANCA CHAMBERS - DEPUTY SHERIFF
(Properly appointed in terms of Section 9(1) of the Sheriff's Act No. 95 of 1995)
Signed at Randburg on 21-06-16

My Reference: 2016/00/07795.00 / RK

Sheriff Randburg South West - Ms M.L. Lephadi
P.O. Box 1298 Ferndale 2160
Tel: +27-11 791 0771/2
Fax: +27-11 791 0484
VAT No./BTW Nr. 4680262655

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REPUBLIC OF SOUTH AFRICA

FORM 2

[Regulation 3]

APPLICATION FOR PROTECTION ORDER

SECTION 2(1) OF THE PROTECTION FROM HARASSMENT ACT, 2011 (ACT NO. 17 OF 2011)

In the Magistrate's Court for the District of JOHANNESBURG NORTH HELD AT RANDBURG

Application number: 415 2016

Name of complainant: PAUL ANTHONY MULLON

This form is to be lodged with the clerk of the court

Is the complainant in possession of or in the process of applying for a protection order against harassment or stalking as provided for in the Domestic Violence Act, 1998 (Act No. 116 of 1998).

Yes ☐ No ☒

PART A : APPLICATION

(*Delete whichever is not applicable)

1. PARTICULARS OF COMPLAINANT

Surname:	MULLON
Full names:	PAUL ANTHONY
Identity number:	5507265206083
Date of birth:	1959/07/28
Home or temporary address:	52 Monte Carlo Drive, Centurion Residential Estate, Centurion
Home/contact telephone numbers:	083 273 6087
Work address:	AS ABOVE
Work telephone number:	083 273 6087
Occupation:	Director at The Digital Marketing Company (Pty) Ltd

Department of Justice and Constitutional Development

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2. PARTICULARS OF PERSON MAKING THE APPLICATION ON BEHALF OF THE ABOVEMENTIONED COMPLAINANT (if applicable)

Surname:	NA
Full names:	NA
Identity number:	NA
Date of birth:	NA
Home or temporary address:	NA
Home/contact telephone number/s:	NA
Work address:	NA
Work telephone number:	NA
Occupation:	NA
Nature of relationship with the complainant:	NA
State reason(s) why application is made on behalf of the complainant:	NA
Indicate whether written consent of complainant has been obtained: (Delete whichever is not applicable)	<p>*(a) Written consent has been obtained and is attached.</p> <p>*(b) Written consent is not necessary since the complainant is a child (under the age of 18 years).</p> <p>*(c) The complainant is unable to provide written consent because:</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p>

Department of Justice and Constitutional Development

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13. PARTICULARS OF RELATED PERSONS AFFECTED BY HARASSMENT (A RELATED PERSON IS ANY MEMBER OF THE FAMILY OR HOUSEHOLD OF A COMPLAINANT, OR ANY OTHER PERSON IN CLOSE RELATIONSHIP TO THE COMPLAINANT):

Name:	Age:	Relationship to complainant:
NA		

4. INFORMATION REGARDING ACTS OF HARASSMENT

(Take note:

- (a) Supporting affidavits by persons who have knowledge of the matter concerned may accompany this application and must be annexed as an annexure to this form.
- (b) If reference is made to any documents, photographs, recordings, videos etc. —
 (i) the original thereof must at all times be kept by the complainant for purposes of submitting it as evidence in this application and a subsequent hearing that may take place;
 (ii) copies of documents and photographs may be attached to this form as an annexure; and
 (iii) copies of audio and video recordings may also be attached to this form as an annexure if it is furnished on a CD, DVD or other computer readable device and in a computer readable format and sealed in an envelope.)
- (c) TAKE NOTE: All annexures to this document must be —
 (i) numbered alphabetically starting with "A"; and
 (ii) listed under paragraph 10, below.

Give full details of all incidents of harassment:

PLEASE SEE ATTACHED AFFIDAVIT

ms

EF *PT*

5. PARTICULARS OF RESPONDENT (PERSON RESPONSIBLE FOR HARASSMENT OF THE COMPLAINANT OR RELATED PERSON):

*5.1 To be completed where the respondent is known to the complainant:

Surname:	Beamish
Full names:	Anthony Beamish
Home address:	Unknown
Address where respondent can likely be found:	Combined Artistic Productions CC, Tulbagh North, 369 Oak Avenue, Randburg,
Telephone number:	
Facsimile number:	Unknown
E-mail address:	tony.beamish@ma.com / Tony@canablanche.co.za
Cellular phone number:	063 257 8718
Work address:	Combined Artistic Productions CC, Tulbagh North, 369 Oak Avenue, Randburg, Johannesburg.
Work telephone number:	011 886 8899
Occupation:	Journalist

*5.2 To be completed where respondent is unknown to the complainant and uses electronic communications to harass complainant:

The name of the service provider which provides a service to the complainant or related person over which the harassing communication was received (for example XYZ Internet service provider which provides an internet service to the complainant/related person who is the owner/user of the computer which received a harassing e-mail):	
The electronic communications identity number associated with the aforementioned service to which the harassing communication was sent (for example the Internet Protocol (IP) address assigned to the computer of the complainant/related person or cellular phone number or telephone number which received the harassing communication):	

hvj
8 *11*

The electronic communications identity number from where the harassing communication originated, where available (for example the e-mail address and/or IP address accompanying the harassing electronic communication or a web-address which contains harassing content or cellular phone number from which the harassing communication originated):	TWITTER.
Date, time and duration of harassing communication, if applicable (for example the complainant received a harassing cellular phone call on 12 December 2012 at 12h00 which lasted 12 minutes):	SEE ATTACHED

***5.3 To be completed where respondent is unknown to the complainant and physically harasses the complainant:**

Will you be able to identify the respondent? Yes ☐ No ☐

(a) Description of respondent: NA

.....

(b) Location where respondent can probably be found:

.....

(c) Any other information that might assist the South African Police Service in tracing the respondent:

.....

[Signature]

[Signature]

[Signature]

(d) (i) Did the complainant or related person make a statement under oath or affirmation at a police station that he or she intends to apply for a protection order against harassment against a person whose name and address are unknown to the complainant: Yes ☐ No ☒

(ii) If the answer under paragraph (d)(i) is yes, please state the following particulars:

At which police station was the statement made:	
Date and time of making the statement:	
Reference number:	

6. INFORMATION REGARDING URGENCY OF APPLICATION

Submit the reasons why the court has to consider the application as a matter of urgency:

The Applicant's reputation and financial standing will be negatively affected if no interim order is granted as the Respondent continually harass and publish defamatory remarks about the Applicant.

[Signature] *ms*

[Signature] *OP*

7. TERMS OF PROTECTION ORDER

The court is requested to —

7.1 prohibit the respondent from —

- *7.1.1 engaging in or attempting to engage in harassment of the complainant;
- *7.1.2 engaging in or attempting to engage in harassment of the related persons whose particulars are provided in paragraph 3, above;
- *7.1.2 enlisting the help of another person to engage in harassment of the "complainant"/related person;

*7.1.3 committing any of the following act/s:

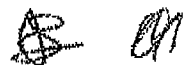
- (a) Make any statements regarding the Applicant, be it of personal, professional or financial nature, including statements made via social media.
- (b) Attempt to contact the applicant directly or indirectly.
- (c) Attempt to contact any person associated to the Applicant.

*7.2 Impose the following additional conditions that are necessary to protect and to provide for the safety and well-being of the "complainant"/related person:

- (a)
- (b)
- (c)

*7.3 order (mark appropriate space and complete where necessary):

* (a)	That a member of the South African Police Service is to seize the following weapon(s) NA	
* (b)	That a member of the South African Police Service is to accompany the complainant or related person to the following residence: NA to supervise the collection of the complainant's or related person's personal property set out in paragraph 8, below.	
* (c)	That the station commander of the NA police station must investigate the matter with the view to instituting a criminal prosecution against the respondent.	

*6. PERSONAL PROPERTY

Property description:	Grounds on which property is considered to be personal property:	Address where property is kept:

9. POLICE STATION WHERE BREACH OF PROTECTION ORDER WILL LIKELY BE REPORTED


I am likely to report a breach of the protection order at the CENTURION / RANDBURG Police Station.

10. INDEX OF ANNEXURES TO THIS FORM

Mark each Annexure alphabetically, starting with "Annexure A", and attach it to this form.	Give short description of Annexure, for example "statement of witness X", "CD with photographs".
SEE AFFIDAVIT ATTACHED	

WARNING:

- * It is a criminal offence to make a false statement in an affidavit for the application for a protection order.
- * The court may make an order as to costs against a party if it is satisfied that the party in question has acted frivolously, vexatiously or unreasonably.


 "Signature" / thumb print / mark of "complainant" person who applies for a protection order on behalf of the complainant

15/6/2016

Date

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PART B : CERTIFICATION

I certify that before administering the "oath /" taking the affirmation I asked the Deponent the following questions and noted "her/his answers in "her/his presence as indicated below:-

- (a) Do you know and understand the contents of the above declaration? Answer: YES
 (b) Do you have any objection to taking the prescribed oath? Answer: NO
 (c) Do you consider the prescribed oath to be binding on your conscience? Answer: YES

I certify that the Deponent has acknowledged that "she/he knows and understands the contents of this declaration which was "sworn to / "affirmed before me, and the Deponent's "signature / "thumb print / "mark was placed thereon in my presence.

Dated at JOHANNESBURG this 15TH day of JUNE 20 16

[Signature]
 Justice of the Peace / Commissioner of Oaths

Full Names: LIZANNE van STADEN
 Designation: Commissioner of Oaths
 Area for which appointed: Practising Attorney, R.S.A.
 Business Address: 22 Hurlingham Road, Illovo, Johannesburg

To be completed by the clerk of the court

PART C:	
1. I, <i>Elizabeth Nkomo</i>	the clerk of the above-mentioned court, received the application for a protection order on (date): <i>17/06/2016</i> (time):
2. I have completed the attached acknowledgement of receipt and handed it to the person who lodged this application for a protection order.	
PART D:	
The application for a protection order was submitted to (name and surname of magistrate):	
on (date): (time):	
Signature of clerk of the court: <i>[Signature]</i>	Office stamp

[Handwritten marks]

✂

Acknowledgement of receipt of application for a protection order by clerk of the court

(Take note: This acknowledgement of receipt must be handed to the person who lodges the application with the clerk of the court)

Application number: 473 20 16

Name of complainant: Pamela Mary Mullen

I, Elizabeth Nolan, the clerk of the Magistrate's Court
for the District of Kerry, hereby acknowledges receipt of
the application for a protection order against harassment.

[Signature]
Signature of clerk of the court

Date:

Time:

Office stamp

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IN THE MAGISTRATES COURT FOR THE DISTRICT OF JOHANNESBURG
NORTH

(HELD AT RANDBURG)

APPLICATION NUMBER:

In the matter between:

PAUL ANTHONY MULLON

APPLICANT

and

ANTHONY BEAMISH

RESPONDENT

FOUNDING AFFIDAVIT IN SUPPORT OF A HARASSMENT ORDER

I, the undersigned,

PAUL ANTHONY MULLON,

Hereby make oath and state the following:

- 1.1. I am the Applicant in this matter, an adult male with full legal capacity residing at 52 Monte Carlo Drive, Centurion Residential Estate, and employed as a director at The Digital Marketing Company (Pty) Ltd.
- 1.2. The contents of this affidavit falls within my own personal knowledge and are both true and correct unless the contrary appears therefrom.
2. The Respondent herein is Anthony Beamish, a journalist in the employ of Combined Artistic Productions CC, a closed corporation registered in terms of the Company Laws of the Republic of South Africa with main place of business at Tulbagh North, 369 Oak Avenue, Randburg. I am not aware of the further particulars of the Respondent.
3. This application is launched in terms of the Protection from Harassment Act, Act 17 of 2011 ("the Act".)

Handwritten signatures and initials:
Two sets of initials at the top right, and two sets of initials at the bottom right.

4. This Honourable Court has the required jurisdiction to adjudicate this application as the Respondent is employed within the jurisdictional area of the Court.

BACKGROUND



5. The Respondent only became known to me on or about 22 March 2016. Although I have not met the Respondent he clearly had done some investigations about me and also threatened to attend to my residence; issue civil summons against me; have me charged criminally; and also listed me as a "default payer" on the system of TransUnion ITC without any grounds.
6. I would like to bring to this Honourable Court's attention that the Respondent is an award winning journalist, employed by United Artistic Productions CC, who is responsible for the production and airing of the well-known actuality program Carte Blanche.
7. The causal link between the Respondent and myself can be described as the fact that the Respondent had published various articles and aired visual programs regarding Ronald and Darren Bobroff ("the Bobroffs"), relating to their attorney firm Ronald Bobroff and Partners, who instructed my company to provide website services from 2013 onwards. I was hereafter also mandated to register, create and maintain two websites, instructed by the Bobroffs, known as www.louingattorneys.co.za and www.ronaldbobroff.com, ("the websites").
8. I confirm that I was originally the registrant of the two aforesaid websites, but after continued harassment and demands by the Respondent it was decided that I will transfer the relevant domains to Mr. Ronald Bobroff, which was effected during May 2016, after application was made to Afrimhost (Pty) Ltd. (the hosting company), on 14 May 2016.
9. At this stage I deem it not necessary to delve into the relationship between the Respondent and the Bobroffs, as this relationship falls outside the scope of this application. The conduct of the Respondent regarding the Bobroffs and his continued attempts to implicate me with them however constitutes harassment which not only causes me fear but also financial harm.

HISTORY

10. The first interaction that I had with the Respondent was when he contacted me telephonically on 23 March 2016 at 03:30 (half past three in the morning) to discuss publications on the websites. As will become clear hereunder the Respondent recorded all our discussions, which was initially not disclosed to me. If required by this Honourable Court these recordings will be made available.
11. As would be expected when you receive a call at 03:30 in the morning, I was not very impressed with the Respondent, neither talkative.
12. On 23 March 2016 the Respondent again contacted me and effectively examined me on my profession; stated that I was the owner of the websites; and that all statements and publications on the websites were authored by me.
13. After I confronted the Respondent about his previous call at 03:30 in the morning, he sarcastically informed me that the websites are online all of the time, and if I do not want to receive calls after hours that I should then "shut down" the websites after hours.
14. On 8 May 2016 the Respondent again contacted me and threatened to visit me at my residence; and that I must remove all defamatory statements published on the website.

RECENT EVENTS

15. The Respondent, without any further notice or basis, reported me to TransUnion ITC as a bad debtor on 10 May 2016, when an entry was recorded against my credit profile under "default data", recoding that the default amount of R 850 000.00 (Eight Hundred and Fifty Thousand Rand) was due to the Respondent, and that the debt description was that of a bad debt written off.
16. The Respondent reported the listing on 9 May 2016, and supplied me with proof thereof on 10 May 2016. A copy of his e-mail to me and listing is attached hereto marked *Annexure "PM 1"*. This e-mail was sent at 14:46 on 10 May 2016.

17. At 15:24 on 10 May 2016, the Respondent sent a further e-mail to me, and attached a link to an audio-visual insert to be aired on Carle Blanche regarding the Bobroffs. A copy of this e-mail is attached hereto marked *Annexure "PM 2"*. This e-mail specifically records that the Respondent warned me to first have a look at the insert and then respond to him. He also warned me of a substantial claim against me.
18. To make things worse the Respondent then contacted my relationship manager at Absa Bank and informed her of the adverse credit listing against my name. He then followed the discussion up with an e-mail confirming the listing, transmitted at 16:46 on 10 May 2016. I attach hereto a copy of the e-mail by the Respondent directed to Ms. Caroline Deyzel of Absa Bank, marked *Annexure "PM 3"*.
19. I deny that I was ever indebted to the Respondent for any amount.
20. On 13 May 2016 I consulted with my current attorney of record, Gerhard Botha of Gerhard Botha Attorneys (herein after referred to as "Botha"), regarding the adverse listing on TransUnion ITC, and my remedies available to the allegations made by the Respondent.
21. During our first consultation Botha contacted the Respondent to discuss the ITC listing, and the Respondent informed him that he should contact the Respondent's attorney, Mr. Anthony Miller.
22. Botha then proceeded and directed two letters to Mr. Miller on 16 March 2016, copies thereof attached hereto marked *Annexure "PM4"* and *"PM5"* respectively.
23. In terms of the first letter of 16 May 2016, Botha recorded that the TransUnion listing was tantamount to extortion, and requested that the listing must either be removed or supporting documentation confirming the listing be supplied. It was also recorded that the listing was placed in dispute with TransUnion ITC, and that a copy of this letter will be supplied to TransUnion ITC in support of the application of removal.
24. In the second letter to Mr. Miller it was further recorded that I merely acted as web-master of the websites, and that I did not publish or created any of the content contained therein. The letter further also confirms that the Respondent



would attempt to use unsolicited telephonic recordings to gather statements from me. My right regarding a Harassment Application was also reserved.

25. To date the only response received from Mr. Miller was an e-mail dated 28 May 2016, wherein it is stated that "...having regard to the impending institution of legal proceedings against your client by our client and others, that in the circumstances no further response is required." A copy of this e-mail is attached hereto marked *Annexure "PM 5"*.
26. I confirm that the TransUnion ITC listing against my name was removed, without any input or instruction by the Respondent, on 20 May 2016. I attach hereto confirmation of the removal of the default listing, marked *Annexure "PM 7"*.
27. After the removal I received no further communication from the Respondent up until 30 May 2016, when he again contacted me directly via e-mail regarding a publication on 30 May 2016, when he demanded that all "untrue information" regarding a publication on www.ronaldbobroff.com. I attach hereto a copy of the e-mail received and the article attached, marked *Annexure "PM 8"*.
28. As Dotha was not available to respond I directed an e-mail to the Respondent at 07:49 on 30 May 2016 to the Respondent, indicating that I am not the owner of the website, and also requested him to contact my attorneys directly.
29. In response to my e-mail the Respondent then replied and stated at 08:10 on 30 May 2016 that he will be taking further steps against me, which include criminal charges.
30. I then responded to the respondent's e-mail and confirmed that I am not responsible for the content on the websites; and also supplied the respondent with proof of the domain registration of the website of Ronald Bobroff, indicating that I am not the registrant. Copies of the e-mails exchanged are attached hereto marked *Annexure "PM 9"*.
31. The Respondent here after turned to his Twitter account, and published at least 3 "tweets" wherein he stated the following:

"I have evidence that @paulmullion is a reckless liar and fabricator of malicious tales. He has knowingly stolen money and also conspired with fugitives Ronald @ darrenb12 #Bobroff to gratuitously defame those who exposed their

criminality. I am to publicly exposed @paulmullon for his own criminal wrong doing."

Copies of these tweets are attached hereto marked *Annexure "PM 10"*.

32. The contents of these tweets are defamatory of nature as I am called a liar, that I stole money and conspired to fugitives.
33. The Respondent has at least 2242 followers on Twitter, and his tweets were either retweeted and or replied by various of his followers, as is clear from *Annexure "PM 11"* a tweet by consumerfumer. A copy of the Respondent's twitter account confirming his follower numbers are attached hereto marked *Annexure "PM 12"*.
34. From both the illegal and irregular listing of the Respondent it had been made clear that the Respondent will use anything in his powers to defame and or harass me. The consequences of his actions are that I am facing a real financial risk and will suffer as a consequence of his allegations. The fact that he pro-actively contacted my relationship manager at Absa Bank is indicative of this fact. It is also noteworthy that he did not oppose the delisting of my details from the TransUnion ITC database. Further legal argument shall be advanced at the hearing of this application in this regard.
35. The fact that the Respondent, after 16 May 2016 again decided to contact me directly is also indicative of the fact that he fail and or refuses to accept that his *modus operandi* to attack me in his crusade against the Bobroffs are illegal and futile. By constantly threatening criminal actions against me the Respondent himself risks the possibility that a charge of extortion can be laid against him.
36. When the Respondent realised that I am not the owner of the websites, neither the author of the contents thereof as referred to above, he elected to turn to twitter as a forum of publication where he defamed and threatened me, which publication had been received by at least 2242 twitter users.
37. Notwithstanding his various threats no action or application had been brought against me.

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38. I further humbly submit that the actions of the Respondent is vexatious and frivolous, and pray that the costs of this application should be borne by the Respondent.

WHEREFORE I PRAY FOR AN ORDER AS SET OUT IN THE APPLICATION.


DEPONENT

THUS SIGNED AND SWORN TO before me at Illovo on this the 15 day of June 2016 by the deponent who acknowledges that he knows and understands the contents of this affidavit; that it is the truth to the best of his knowledge and belief and that he has no objection to taking the prescribed oath and regards the same as binding on his conscience and the administration of the oath complied with the Regulations contained in Government Gazette No R1258 of 21 July 1972, as amended.


COMMISSIONER OF OATHS

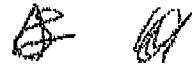
EX OFFICIO :

FULL NAMES:

PHYSICAL ADDRESS:

DESIGNATION:

LIZANNE van STADEN
Commissioner of Oaths
Practising Attorney, R.S.A.
22 Hurlingham Road
Illovo, Johannesburg



000086

Gerhard Botha

From: Paul Mullen <paulm@digital-marketing.co.za>
Sent: 13 May 2016 11:01 AM
To: 'Gerhard Botha'
Subject: FW: RONALDOBROFF.COM
Attachments: signature.asc

From: Paul Mullen (mailto:paulm@digital-marketing.co.za)
Sent: Tuesday, May 10, 2016 2:46 PM
To: Ronald Bobroff (bobroffronald@gmail.com) <bobroffronald@gmail.com>
Subject: FW: RONALDOBROFF.COM

From: Tony Beamish (mailto:tony.beamish@ms.com)
Sent: Tuesday, May 10, 2016 11:30 AM
To: paulm@digital-marketing.co.za
Subject: RONALDOBROFF.COM

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[Return to the Debtor List](#)

[Click here to withdraw this Default Listing \(this is done a](#)

DEBTOR DETAILS

Debtor Identifier: 4208986
Debtor Type: Consumer Entity
Debtor Name: PAUL MULLON
ID Number: 5907285206083
Telephone Number: 0832736087
Physical Address: 52 MONTE CARLO DRIVE
CENTURION RESIDENTIAL ESTATE
CENTURION
GAUTENG
0157

[Click here to perform a Director Search on Paul](#)
[Click here to perform a Consumer Trace \(By Name\) o](#)
[Click here to perform a Consumer Credit Enquiry on](#)

DETAILS OF DEBT

Creditor Name: Anthony K Beamish
Contact Number: 063 257 8718
Date of Default: 2016/05/16
Amount: R 850,000
Account Number: MUL001

ACTION REQUESTED

Collection Letter? No
Listed as Default? Yes Requested on 2016/05/09

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FR: 2

Gerhard Botha

From: Paul Mullon <paulm@digital-marketing.co.za>
Sent: 13 May 2016 11:01 AM
To: 'Gerhard Botha'
Subject: FW: Striking the Bobroffs - Carte Blanche

From: Paul Mullon [mailto:paulm@digital-marketing.co.za]
Sent: Tuesday, May 10, 2016 4:28 PM
To: [REDACTED]
Subject: FW: Striking the Bobroffs - Carte Blanche

From: Tony Beamish [mailto:Tony@carteblanche.co.za]
Sent: Tuesday, May 10, 2016 1:24 PM
To: paulm@digital-marketing.co.za
Subject: Striking the Bobroffs - Carte Blanche

Dear Mr Mullon

Please see the attached Carte Blanche insert before responding to me. It will give you some insight into the cause that you have been championing and why the damages claims that are likely to come your way will be as substantial as my own.

View the Sunday, May 9, 2016 Bobroff insert [here](#):

<http://carteblanche.dstv.com/bobroff-transcript/>



Now known as
100% Authentic Carte Blanche
www.cartelance.co.za
0711

No virus found in this message.

Checked by AVG - www.avg.com

Version: 2016.0.7596 / Virus Database: 4568/12202 - Release Date: 05/09/16

/// GW

SP

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'PM 3'

Gerhard Botha

From: Paul Mullen <paulm@digital-marketing.co.za>
Sent: 13 May 2016 10:55 AM
To: 'Gerhard Botha'
Subject: FW: Your client: Paul Anthony Mullen. 390728 5206 08 3
Attachments: Mullen, Paul Anthony - ITC - 2016-05-10.pdf; Untitled attachment 00429.htm; signature.asc

From: Paul Mullen (mailto:paulm@digital-marketing.co.za)
Sent: Tuesday, May 10, 2016 5:05 PM
To: [REDACTED]
Subject: FW: Your client: Paul Anthony Mullen: 590728 5206 08 3

From: Tony Beamish (mailto:tony.beamish@mc.com)
Sent: Tuesday, May 10, 2016 4:45 PM
To: caroline@absa.co.za
Cc: paulm@digital-marketing.co.za
Subject: Your client: Paul Anthony Mullen: 590728 5206 08 3

Dear Ms Deyzel

Our discussion earlier today and Mr Mullen's attached ITC Report refer.

Mr Mullen subsequently contacted me. I shall let you know once he has made payment arrangements with me and I will similarly notify ITC.

Regards

Yours sincerely

Tony Beamish

063 257 8718

WVS
[Handwritten initials and marks]

LEGAL CITY

Your Online Legal Partner
www.legalcity.net2nd Floor, North Block, Bradenham Hall, 7 Mills Road, Riverlea, 2126
P O Box 837, Galle Manor, 2052 • E-Mail: info@legalcity.net Telephone: 086 11 76378 • Fax: 086 648 7653

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- This page printed on May 10, 2016 at 1:34:46 pm, SA Standard Time.

Consumer Credit Enquiry

TransUnion

TransUnion is Southern Africa's leading provider of data-based business intelligence solutions, providing access to information on 18 million credit-active South Africans as well as 2,1 million local businesses. Credit reports are updated and retrieved in real-time always ensuring that you have the latest data to assist you with your risk management decisions.

YOUR ENQUIRY

First Name/s: PAUL
Surname: MULLON
RSA ID Number: 5907285206083
Enquiry Reason: Fraud, Corruption or Theft Investigation

This response was cached on 2016/05/10 at 1:34:46 PM

CONSUMER CREDIT INFORMATION

Definite Match: Yes
Data Disputed: No

CONSUMER INFORMATION

Information Date: 2016/05/10
Consumer Name: MR PAUL ANTHONY MULLON
Identity Number(s): 5907285206083
Gender: Male
Date of Birth: 1959/07/28
Date Deceased: 00000000
Telephone Numbers: H(012)6673391 B(012)6673391
Marital Status: MARRIED with 2 dependants
Spouse's Name: GERALDINE

CONSUMER COUNTERS

	Enquiries	Judgements	Notices	Defaults	Profiles	Trace Alerts
In the past 12 months	3	0	0	1	0	0
12 months prior to that	0	0	0	0	0	0
More than 24 months ago	0	0	0	0	0	0

CONSTRAINTS

Date Alias
2011/12/14 MULLON, PA
2008/06/10 MULLON, E

1993/05/11 MULLER, P.A

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ADDRESSES			
Date	Address	Period	Type
2010/05/20	BOX 66484, 0000	0 Years	Owner
2009/11/11	52 MONTE CARLO DR, CENTURION GOLF ESTATE, CENTURION, 0000, GAUTENG	6 Years	Unknown
2012/02/04	7 ALBION MILL, 241 MAIN RD, NEWLANDS, CAPE TOWN, 7700, WESTERN CAPE	2 Years	Unknown
2010/05/20	BOX 6484, HIGHVELD, PRETORIA, 0169, GAUTENG	0 Years	Owner

EMPLOYMENT HISTORY			
Date	Occupation	Employer	Period
2016/04/20		PA MULLON	0 Years
2014/02/19		COR CONCEPTS	0 Years
2012/10/15	Director		0 Years

DEBT DETAILS

Debt Description: Bad Debt Written Off Date Written Off: 2016/05/10
 Default Date: 2016/05/10 Default Amount: R 850,000
 Defaulter Name: PAUL MULLON
 Address: 52 MONTE CARLO DR, CENTURION RESIDENTIAL EST, CENTURION, 0157
 ID Number: 5907285206083 Date of Birth: 1959/07/28
 Account Details: MUL001 / Branch Code:
 Comments: DONE FOR ANTHONY K BEAMISH
 Reported By: TONY BEAMISH (Tel. 063 2578718)
 TransUnion Subscriber: LEGAL CITY USERS

CREDIT ENQUIRIES			
Date	Reason	Enquirer Contact Details	Subscriber
2016/05/10	FRAUD	ANTHONY K BEAMISH 063 257 8718	LEGAL CITY USERS
2016/05/28	CREDIT APP	CC BEYSEL 6747200	ABSA CREDIT LINK
2015/09/02	INS APP	MAPULE MASHISHI 012 673 1000	OUTSOURCING INSURA

Disclaimer :: Credit Enquiries

This information is provided by a direct link to TransUnion. Accordingly, Legal City, acting only as an agent for TransUnion's data, takes no responsibility for any loss or damage suffered by any person or organisation relying on this information.

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GERHARD BOTHA

ATTORNEYS AT LAW / PROKUREURS

1 ST FLOOR	PO BOX 1257	TELEPHONE	011 - 268 6673
UNIMOD BUILDING	PARKLANDS	FACSIMILE	011 - 268 6780
22 GURKINGHAM ROAD	2121	CELLULAR PHONE	083 368 6598
BLOVO, JOHANNESBURG		E-MAIL	gerhard@gbattorneys.co.za

16 MAY 2016

Our ref: GGBA 242/16
Your ref: Mr. Millar

NORMAN BERGER AND PARTNERS
FOR ATTENTION: MR. ANTHONY MILLAR
PER TELEFAX:
PER E-MAIL:

Dear Sir,

RE: YOUR CLIENT: MR. ANTHONY BEAMISH
OUR CLIENT: MR. PAUL MULLON

1. Aforementioned matter, as well as the telephonic discussion between your Mr. Millar and writer hereof on 13 May 2016 refers.
2. We confirm that we hold instructions from Mr. Paul Mullon. Your client, Mr. Anthony Beamish, requested us to deal directly with your offices regarding the dispute between our respective clients.
3. From the outset we confirm that your client, without any cause or legal basis, reported our client to Transunion ITC as a "default payer". We record that this listing is clearly a malicious and illegal attempt by your client to discredit our client. The listing was effected on or about 10 May 2016 for an amount of R 850 000.00 (Eight Hundred and Fifty Thousand Rand). Your client also contacted our client's bankers to ensure that they be made aware of this listing.
4. From the outset our client denies that he is indebted to your client, be it by way of contract or delict. From the discussions between the parties (which had been recorded by your client), it is clear that your client threatened our client with legal action. To date hereof your client failed to issue any process against our client, confirming that no debt as claimed by your client exists or had been quantified.
5. Our client is of the belief that your client's listing is tantamount to extortion, and our client's rights remain reserved in this regard.
6. Our offices placed the listing of our client by your client in dispute with Transunion ITC, and confirm that a copy of this letter will be submitted to Transunion ITC in support of our client's request to remove the listing under discussion.
7. We will address your client's allegations against our client in a separate letter, but at this stage request your client to immediately instruct Transunion ITC to remove the adverse listing compiled and submitted by your client.

Gerhardus Johannes Botha - B.Com Law, LL.B. - University of Stellenbosch
Assisted by: Mphahlele Ruddy Ntshong - LL.B. - Umlazi (mphy@gbattorneys.co.za); Arneloel J. de Klerk - David John Rensburg (david@gbattorneys.co.za)
(Office manager: Astrid Gieseler) (astrid@gbattorneys.co.za)

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8. If your client refuses to remove the listing we request you to supply us with the supporting documentation (if any) supplied by your client to Transunion ITC.
9. Kindly acknowledge receipt hereof.

Regards,

GERHARD BOTHA

Unsigned copy sent via e-mail

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GERHARD BOTHA

ATTORNEYS AT LAW / PROKUREURS

1 ST FLOOR	P O BOX 1255	TELEPHONE	011 - 268 6811
UNION BUILDING	PARKLANDS	FACSIMILE	011 - 268 3789
22 HURLingham ROAD	2101	CELLULAR PHONE	082 366 8396
ELDO, JOHANNESBURG		E MAIL	gerhard@toutingattorneys.co.za

16 MAY 2016

Our ref: GB/M 242/16
Your ref: Mr. Miller

NORMAN BERGER AND PARTNERS
FOR ATTENTION: MR. ANTHONY MILLAR
PER TELEFAX: 011 786 3111
PER E-MAIL: anthony@normanberger.co.za

Dear Sir,

RE: YOUR CLIENT: MR. ANTHONY (TONY) BEAMISH
OUR CLIENT: MR. PAUL MULLON

1. Aforementioned matter, as well as our letter relating to the TransUnion ITC listing or our client by Mr. Beamish of even date, refers.
2. We confirm that we now had the opportunity to peruse both e-mail communications exchanged between our respective clients, as well as to listen to the telephonic discussions between the parties as recorded by your client.
3. The relevant audio recordings received from our client are as follows:
 - a. Recording of 23 March 2016;
 - b. Voice message from your client to our client at about midnight on 8 May 2016;
 - c. Voice recording of 10 May 2016.
4. We note that your client, in the most recent discussion between the parties, invited our client to remove any reference to your client on the Ronald Bobroff website, which removal will be deemed to be a without prejudice settlement between the parties. In the same discussion your client however indicates that legal action will be taken against our client; that our client "owes" your client the amount of R850 000.00; and that our client published the information that your client is objecting against. Please indicate what your client's current position is pertaining to settlement and/ or threatened legal action.
5. Please note that our client is effectively the "web-master" for the websites known as www.ronaldbobroff.com and www.toutingattorneys.co.za. Our client used to be the registrant of the said domains, but have transferred these domains to Mr. Ronald Bobroff.

Gerhardus Johannes Botha - B Comm Law LLB - University of Stellenbosch
Assisted by: Muzeyi Reddy Kumboro LLB - Unisa (South Africa) LLB - Unisa (South Africa) LLB - Unisa (South Africa)
Office manager: Anand Gnanasekaran anand@toutingattorneys.co.za Articled clerk: David John Brackley david@toutingattorneys.co.za

[Handwritten signatures and initials]

6. The allegation that our client published defamatory remarks about your client are both unfounded and misplaced. Neither had our client been the author of any remarks about your client, as had been confirmed in the discussion between the parties on 10 May 2016.
7. We specifically record that your client is attempting, through telephonic discussions, to manipulate and misconstrue the involvement of our client with the two aforementioned domains and websites.
8. In amplification of the aforesaid we confirm that your client contacted our client on or about 22 March 2016 at 03:30 in the morning to "discuss" certain issues at hand.
9. On 23 March 2016 your client again contacted our client without any proper introduction. In this discussion your client attempted to coax our client into admissions relating to the following aspects:
 - a. That our client was a journalist;
 - b. Our client was the owner of the websites referred to above;
 - c. That the publications on the websites was that of our client; and that all references made to Ronald Bobroff and Associates; as well as the individual partners of this firm, were made after information had been received from "reliable sources";
 - d. Your client also intimated that the websites under discussion should be "shut-down" after hours if our client is not willing to accept his telephone calls after hours.
10. Since 10 May 2016, after your client listed our client (illegally) as a "defaulter" on the TransUnion ITC database; he proceeded and directed to our client various e-mails, with certain attachments. One of these attachments relate to a "Confidential Report" issued by one A Reddy and P Mampofa, who submitted this report regarding Ronald Bobroff and Associates to the Law Society of the Northern Provinces. Not only does this report fail to deal with any allegations regarding your client, but is *per se* confidential of nature. We invite your client to first disclose how he obtained the report, and secondly what the relevance of the report is to our client.
11. Your client also left a threatening message to our client on 8 May 2016, wherein he states that he knows where our client resides, and trust that it will not be necessary to visit our client at his home, as he expected our client to remove the allegedly adverse allegations against your client.
12. Based on the aforesaid we believe that your client has no claim against our client for any relief in law, be it through interdict or a damages claim.
13. We further record that your client's actions towards our client constitutes harassment, and our client's rights remain reserved in this regard. We again record that our client's listing as a "defaulter" on the database of TransUnion ITC is illegal and is tantamount to extortion.

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14. If your client is adamant that he has any claim against our client we invite your offices to supply us with proof of these claims, including the statements made regarding your client and the causal link between these statements and our client.
 15. Please also request your client to refrain from contacting our client.
 16. Our client's rights remains reserved *in toto*.
 17. Kindly acknowledge receipt hereof.

Regards.


GERHARD BOTHA
Unsigned copy sent via e-mail

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Gerhard Botha

From: Norman Berger & Partners Inc <anthony@normanberger.co.za>
Sent: 26 May 2016 12:45 PM
To: Gerhard Botha
Cc: Roddy Katombe; david@gbattorneys.co.za
Subject: RE: Mr. Tony Beamish / Mr. Paul Mullen - ITC

Dear Mr Botha,

We acknowledge receipt of your email together with your attached letter of 16 May 2016.

We are instructed by our client, that having regard to the impending institution of legal proceedings against your client by our client and others, that in the circumstances no further response is required.

Regards
Anthony Miller
(direct email: anthony@normanberger.co.za)

This document is being transmitted electronically and is therefore unsigned

Norman Berger & Partners Inc
(Attorneys, Notaries, Conveyancers & Administrators of Deceased Estates)
84-8th Avenue corner Louis Botha Avenue Highlands North Johannesburg 2192
P O Box 250 Highlands North 2037
Tel: +27 (11) 786-3086 Fax: +27 (11) 786-3111

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From: Gerhard Botha [mailto:gerhard@gbattorneys.co.za]
Sent: 16 May 2016 02:15 PM
To: Norman Berger & Partners Inc
Cc: 'Roddy Katombe'; david@gbattorneys.co.za
Subject: Mr. Tony Beamish / Mr. Paul Mullen - ITC

Dear Mr. Miller,

Please see attached a letter for your attention.

Kindly acknowledge receipt hereof.

Kind regards,

Gerhard Botha
Gerhard Botha Attorneys
1st Floor, Unihold Building
22 Hurlingham Road
Illovo, Sandton
Tel: 011 268 5821
Fax: 011 268 5789
Cell: 083 3888 598

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Worshers Office Park
52 Convent Drive, 1100
Johannesburg, South Africa. 2106

Your Reference No: T220160513000332-01

Date: 15 June 2018

Fax No:

ADDY & GIBBONS & CO ZA

DER SWINGPLAN

RE: CIRCUIT OUTCOME: PAUL MILLON HQ NO. 6807285705093

We refer to your dispute submitted to us on the 12 May 2018 and we hereby inform you that the challenge/objection has been resolved in the following manner:

We have not found any credible evidence to support the challenged information and have accordingly removed it from your partner's credit profile. Please note that should we obtain credible evidence at a later stage that supports the listing, we would be obliged to reinstate the listing as Credit Review may not knowingly or negligently provide a report that contains inaccurate information in terms of Section 71 (2)(g) of the National Credit Act No. 38 of 2005. In such event we shall notify you accordingly.

A copy of your amended personnel growth profile will be forwarded for your records.

Should you have any queries pertaining to this matter, please do not hesitate to contact the writer listed.

Yours faithfully

Nonlinear Analysis

Department: Translink Operations
 Test No: 4273418884463
 Fax No: +27 11 248 4193
 Email: Operations@translink.co.za

2017年11月11日

စီမံကိန်းရေးဆွဲရာတွင် မြန်မာနိုင်ငံတော်အတွင်းရှိ အခြေခံအဆောက်အအုံများကို အခြေခံအားဖြင့် အောက်ပါအတိုင်း ဖော်ပြထားပါသည်။

Figure 7

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Page 8

Asterid

To: Gerald Boffa
 Subject: RE: Your christoboff.com website

From: Gerald Boffa (mailto:GeraldBoffa@comcast.net)
 Sent: 19 June, 2016 8:57 PM
 To: tmj@tjmarketing.com
 Subject: FW: Your christoboff.com website

From: Tony Muller (mailto:tmj@tjmarketing.com)
 Sent: 16 May 2016 07:31 AM
 To: Gerald Boffa (mailto:GeraldBoffa@comcast.net); 'Gerald Boffa' <GeraldBoffa@comcast.net>
 Subject: FW: Your christoboff.com website

Please can you respond urgently to him informing him that this is not my website.

From: Tony Muller (mailto:tmj@tjmarketing.com)
 Sent: Monday, May 30, 2016 7:35 AM
 To: GeraldBoffa@comcast.net
 Subject: Your christoboff.com website

Dear Mr Muller

I refer to our previous discussions, my earlier calls and the attached screenshots.

I am giving you until 8AM this morning to remove all ~~untrue information~~ concerning me from your website. Mr Justice Tychert did not make the comments about me that you attribute to him.

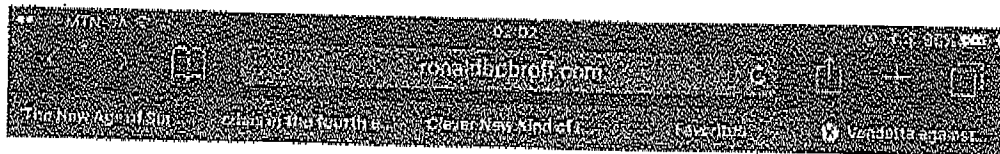
Your adding and abetting of the Boffas, who are fugitives from justice, is misguided.

Should you fail to comply with the above request you will be in big trouble. By then I mean big trouble legally and financially. We warned.

Tony Bannish

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THE FACTS NOT THE FICTION AS TO WHATS REALLY BEHIND THE RELENTLESS ATTACK BY DISCOVERY AND ITS PROXIES ON RONALD BOBROFF, DARREN BOBROFF AND RBP INC.

This site contains factual and substantiated proof how Discovery Health via its in house debt collector Jeffrey Katz has waged a five-year long vendetta against Ronald and Darren Bobroff and the practice RBP Inc as vengeance for them, in the course of defending their clients exposing Discovery's unlawful, fraudulent and immoral conduct, whereby it abuses and extorts members and their families who sustain injury in road accidents and other trauma.

You will read how Katz made specific threats on a number of occasions to RBP director Stephen Bezuidenhout, to RBP's senior advocate at a hearing not involving Discovery according to its attorney George Van Niekerk of Edward Nathan. (so why was Katz there?) and to Darren Bobroff: that "We (Discovery) will destroy you all, no matter what it takes and no matter what it costs".

You will also read how Discovery via its attorneys Edward Nathan effectively hijacked the Law Society Council by packing it with Discovery attorneys and others closely connected to Discovery or ENS, and how it catapulted a shady ambulance chaser, Anthony Millar of Norman Berger and Partners whose practice comprises of poor black road accident victims who they unethically tout via their employee Jabu from Natalspruit Hospital; to the office of "president" of the Law Society of the Northern Provinces. Millar has never previously served on any committee of the organized profession, and his rigged installation as "president" of the Law Society by Discovery / ENS, is a corrupt

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DISCOVERY'S MEDIA LACKEY TONY KILROY BEAMISH

Beamish admitted to all three RBP directors in January 2014, that he had been "brought back" from the south of France where he lives, to South Africa by Discovery. He has since then, and despite professing to be a journalist, written about nothing else than attacks on Ronald, Darren, RBP, and anyone associated with them, or the firm. To date he has written in excess of 45 malicious attacks, primarily in fringe publications such as Moneyweb and Noseweek.

Money web which continues to lose money and seems set to disappear into insolvency, obviously welcomes Beamish's hysterical drive, as a means to boost its flagging fortunes. Beamish has also engaged in a vicious social media campaign in concert with Millar, Katz, Cora Van Der Merwe and other twitter participants who are believed to be Millar and Katz using pseudonyms. Beamish has distributed his trash to a database of all South African attorneys, stolen from RBP's server by Beamish's accomplice Cora Van Der Merwe using various fronts such as NewsinfoSa and others.

During a recent court hearing March 10 2016, where Beamish's vicious and puerile tweets and other social media attacks on Ronald and Darren were canvassed, including Beamish sending his filth to the parents of the children in Darren Bobroff's children school class, and having regard to the shocking levels to which Beamish stooped in these communications, the presiding judge Neil Tuchten was sufficiently disgusted to describe Beamish as:

"THROUGHLY MEANSPIRITED"

HIS WRITING AS "DOGGEREEL" and

"I DON'T THINK I WOULD LIKE A PERSON LIKE THAT TO HAVE A MEAL IN MY HOUSE"

ONE CAN ONLY BUT TOTALLY AGREE, WITH THE JUDGES OPINION OF BEAMISHES CHARACTER!

LAW SOCIETY EXPOSES DISCOVERY, AND EDWARD NATHAN'S GEORGE VAN NIEKERK, AS BEING BEHIND THE ATTACK ON RONALD, DARREN AND RBP INC

6. 2016/03/10 - Discovery's Media Lackey Tony Kilroy Beamish is a

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Whois: ronaldhobroff.com

RES: Domain Name: RONALDOBROFF.COM
 Registry Domain ID: 2017636310_DOMAIN_COM-VRSN
 Registrar WHOIS Server: whois.tucows.com
 Registrar URL: http://tucowsdomains.com
 Updated Date: 2016-03-31T16:47:23Z
 Creation Date: 2016-03-31T16:47:23Z
 Registrar Registration Expiration Date: 2017-03-31T16:47:23Z
 Registrar: TUCOWS, INC.
 Registrar IANA ID: 69
 Registrar Abuse Contact Email: domainabuse@tucows.com
 Registrar Abuse Contact Phone: +1.416.335.0123
 Reseller: Afrihost
 Domain Status: clientTransferProhibited
 Domain Status: clientUpdateProhibited
 Registry Registrant ID:
 Registrant Name: Paul Mullen
 Registrant Organisation: The Digital Marketing Company
 Registrant Street: 63 Wessels Rd
 Registrant City: Johannesburg
 Registrant State/Province: Gauteng
 Registrant Postal Code: 2128
 Registrant Country: ZA
 Registrant Phone: +27.832736687
 Registrant Phone Ext:
 Registrant Fax: +27.865567392
 Registrant Fax Ext:
 Registrant Email: paulm@digital-marketing.co.za
 Registry Admin ID:
 Admin Name: Afrihost Support
 Admin Organization: Afrihost
 Admin Street: 63 Wessels Rd
 Admin City: Johannesburg
 Admin State/Province: Gauteng

Sent from my iPad

No virus found in this message
 Checked by AVG - www.avg.com
 Version: 2016.0.7592 / Virus Database: 4568/11334 Release Date: 05/20/16

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"Pm 9"

Gerhard Botha

From: Paul Mullon <paulm@digital-marketing.co.za>
 Sent: 30 May 2016 08:32 AM
 To: Tony Beamish
 Cc: Gerhard Botha
 Subject: RE: Your ronaldbobroff.com website
 Attachments: domain ownership ronaldbobroff.PNG

Mr Beamish

Here is the domain registration of ronaldbobroff.com

Paul Mullon

From: Tony Beamish [mailto:tony.beamish@me.com]
 Sent: Monday, May 30, 2016 8:18 AM
 To: Paul Mullon <paulm@digital-marketing.co.za>
 Cc: Gerhard Botha <gerhard@gbattorneys.co.za>; Anthony Millar <anthony@normanberger.co.za>
 Subject: Your ronaldbobroff.com website

Mr Mullon

Please put your version of events under oath so that it won't keep changing. You have not presented a single iota of evidence to buttress your version.

You are a reckless liar and a fabricator of malicious tales and I shall ensure that the legal systems deals harshly with you.

Tony Beamish

Sent from my iPhone

On 30 May 2016, at 08:13, Paul Mullon <paulm@digital-marketing.co.za> wrote:

I did not admit at any time that I was responsible for the content of either website.

I did register the domain initially for Mr Bobroff, and transferred the domain to him. He is the legal owner of both domains and all content is his and his alone.

From: Tony Beamish [mailto:tony.beamish@me.com]
 Sent: Monday, May 30, 2016 8:10 AM
 To: Paul Mullon <paulm@digital-marketing.co.za>
 Cc: Gerhard Botha <gerhard@gbattorneys.co.za>; Anthony Millar <anthony@normanberger.co.za>
 Subject: Your ronaldbobroff.com website

Mr Mullon

Please forward to your attorney the screenshots that accompanied the email below.

In the letter received by my attorney from your attorney he conceded that you were responsible for the publication of the content. Without your involvement, the content would not have been published.

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Your name is the only name on the registration of this website and of toutingattorneys.co.za. I have a recording of you in which you admitted ownership of toutingattorneys.co.za.

You seem to lack insight into the wrongfulness of your conduct.

I will be taking further steps against you, which will include criminal charges. I invite you to tell me when the offending content has been removed from both this website and the Internet.

While typing this message you attempted to call me. I am in a queue at a municipal office and shall return your call later.

Tony Beamish

Sent from my iPhone

On 30 May 2016, at 07:49, Paul Mullen <paulm@digital-marketing.co.za> wrote:

Dear Mr Beamish

As per my attorneys letter to your attorney, this is not "my website". It belongs to Mr Bobroff, he is the owner of the site, the domain and all content. My attorney will contact you as soon as I can get hold of him.

I believe you have his e-mail address and if you wish him to remove any content, please contact him directly.

Sincerely

Paul Mullen

From: Tony Beamish (<mailto:tony.beamish@me.com>)

Sent: Monday, May 30, 2016 7:15 AM

To: paulm@digital-marketing.co.za

Subject: Your ronaldbobroff.com website

Dear Mr Mullen

I refer to our previous discussions, my earlier calls and the attached screenshots.

I am giving you until 8AM this morning to remove all untrue information concerning me from your website. Mr Justice Tuchten did not make the comments about me that you attribute to him.

Your aiding and abetting of the Bobroffs, who are fugitives from justice, is misguided.

Should you fail to comply with the above request you will be in big trouble. By this I mean big trouble legally and financially. We warned.

Tony Beamish

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Domain Name: RONALDOBROFF.COM
 Registry Domain ID: 2017634310_DOMAIN_COM-VRSH
 Registrar WHOIS Server: whois.tucows.com
 Registrar URL: http://tucowsdomains.com
 Updated Date: 2016-05-16T04:48:09Z
 Creation Date: 2016-03-31T16:47:23Z
 Registrar Registration Expiration Date: 2017-03-31T16:47:23Z
 Registrar: TUCOWS, INC.
 Registrar IANA ID: 69
 Registrar Abuse Contact Email: domainabuse@tucows.com
 Registrar Abuse Contact Phone: +1 4166350123
 Reseller: Afrihost
 Domain Status: clientTransferProhibited
 Domain Status: clientUpdateProhibited
 Registry Registrant ID:
 Registrant Name: Ronald Bobroff
 Registrant Organization: Ronald Bobroff
 Registrant Street: 63 Wessels Rd
 Registrant City: Johannesburg
 Registrant State/Province: Gauteng
 Registrant Postal Code: 2128
 Registrant Country: ZA
 Registrant Phone: +27 116127200
 Registrant Phone Ext:
 Registrant Fax: +27 865529000
 Registrant Fax Ext:
 Registrant Email: bobroffronald@gmail.com
 Registry Admin ID:
 Admin Name: Afrihost Support
 Admin Organization: Afrihost
 Admin Street: 63 Wessels Rd
 Admin City: Johannesburg
 Admin State/Province: Gauteng
 Admin Postal Code: 2128
 Admin Country: ZA
 Admin Phone: +27 116127200
 Admin Phone Ext:
 Admin Fax: +27 865529000
 Admin Fax Ext:
 Admin Email: dnsadmin@afrihost.com
 Registry Tech ID:
 Tech Name: Afrihost Support
 Tech Organization: Afrihost
 Tech Street: 63 Wessels Rd
 Tech City: Johannesburg
 Tech State/Province: Gauteng
 Tech Postal Code: 2128
 Tech Country: ZA
 Tech Phone: +27 116127200
 Tech Phone Ext:
 Tech Fax: +27 865529000
 Tech Fax Ext:
 Tech Email: dnsadmin@afrihost.com
 Name Server: NS DNS1.CO.ZA
 Name Server: NS DNS2.CO.ZA
 Name Server: NS OTHERDNS.NET
 Name Server: NS.OTHERDNS.COM
 DNSSEC: unsigned
 URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/
 Last update of WHOIS database: 2016-05-16T04:48:09Z

AWS
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Gerhard Botha

From: Paul Mullen <paulm@corconcepts.co.za>
 Sent: 31 May 2016 07:11 AM
 To: Ronald Bobroff: 'Gerhard Botha'
 Subject: FW: @rimmor retweeted a Tweet you were mentioned in!

Gerhard

Please can we meet urgently. This must stop

Regards

Paul

From: Karin Morrow (via Twitter) [mailto:notify@twitter.com]
 Sent: Monday, May 30, 2016 9:52 PM
 To: Paul Mullen <paulm@corconcepts.co.za>
 Subject: @rimmor retweeted a Tweet you were mentioned in!



Paul Mullen,
 A Tweet you were mentioned in got retweeted!



Tony Beamish
 3 May 2016

I have evidence that @paulmullen is a reckless liar
 and a fabricator of malicious tales. He has
 knowingly taken stolen money and ... /1



Retweeted by



Karin Morrow
 1 May 2016

Learn more about Twitter



Forgot your Twitter password? Get instructions on how to reset it.
 You can also unsubscribe from these alerts or change your notification settings. [Need help?](#)
 If you received this message in error and did not sign up for Twitter, click [not my account](#).

WS

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Gerhard Botha

From: Paul Mullen <paulm@corconcepts.co.za>
 Sent: 30 May 2016 03:29 PM
 To: 'Gerhard Botha'
 Subject: FW: Tony Beamish (@TonyBeamish) mentioned you in conversation on Twitter!

From: Tony Beamish (via Twitter) [mailto:notify@twitter.com]
 Sent: Monday, May 30, 2016 5:24 PM
 To: Paul Mullen <paulm@corconcepts.co.za>
 Subject: Tony Beamish (@TonyBeamish) mentioned you in conversation on Twitter!



Tony Beamish
 mentioned you.



Tony Beamish

@TonyBeamish

... and @paulmullen has also conspired with
 fugitives Ronald & @darrenrb13 #Bobroff to
 gratuitously defame those who exposed ...
 /2



View conversation

Retweeted by Paul Mullen
 30 May 2016 03:29 PM

WS
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 & 11

000109

Gerhard Botha

From: Paul Mullen <paulm@corconcepts.co.za>
Sent: 30 May 2016 05:30 PM
To: 'Gerhard Botha', Ronald Bobroff
Subject: FW: Tony Beamish (@TonyBeamish) mentioned you in conversation on Twitter!

From: Tony Beamish (via Twitter) [mailto:notify@twitter.com]
Sent: Monday, May 30, 2016 5:25 PM
To: Paul Mullen <paulm@corconcepts.co.za>
Subject: Tony Beamish (@TonyBeamish) mentioned you in conversation on Twitter!



Tony Beamish
mentioned you.



Tony Beamish

@TonyBeamish

... their criminality. I am about to publicly
expose @paulmullen for his own criminal
wrong doing. 3/3



View conversation

hnt



Gerhard Botha

From: Paul Mullon <paulm@corconcepts.co.za>
 Sent: 31 May 2016 07:13 AM
 To: 'Gerhard Botha'; Ronald Bobroff
 Subject: FW: Tony Beamish (@TonyBeamish) liked a Tweet you were mentioned in!

From: Tony Beamish (via Twitter) [mailto:notify@twitter.com]
 Sent: Monday, May 30, 2016 11:27 PM
 To: Paul Mullon <paulm@corconcepts.co.za>
 Subject: Tony Beamish (@TonyBeamish) liked a Tweet you were mentioned in!



Paul Mullon,
 A Tweet you were mentioned in got liked!



In reply to Tony Beamish and 2 others

consumerfumer
 #consumerfumer

@paulmullon You should mull on all the court rulings against the #Bobroffs their suspension from practice & fugitive status @TonyBeamish



Liked by



Tony Beamish @TonyBeamish

See what else @TonyBeamish is liking.


[View their profile](#)

Forgot your Twitter password? Get instructions on how to reset it.
 You can also unsubscribe from these emails or change your notification settings. Need help?
 If you received this message in error and did not sign up for Twitter, click not my account.
 Twitter, Inc. 1355 Market Street, Suite 400, San Francisco, CA 94103

WJ
 11

[Handwritten marks]

YOU'LL NEVER CHANGE YOUR LIFE UNTIL YOU
CHANGE SOMETHING YOU DO DAILY. THE SECRET OF
SUCCESS IS FOUND IN YOUR DAILY ROUTINE



72.9K	1.1K	2.3K	2.7K
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Follow

Tony Beamish

@TonyBeamish

PhD (2010) and Telecommunications (2014) winner
of the *Journalism* award
of the Year Award. Senior Journalist at
the *Telegraph*.

Q. Beamish, *Telegraph*
of *Telegraph* to go

Joined January 2012

471 Photos & Videos



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Martin Watt Hargrave
@Martin_Watt

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@consumerism

Walter Wenzel
@WalterWenzel

Nik van Nieuwen
@NikvanNieuwen

Chris van Nieuwen
@ChrisvanNieuwen

Friends

4 Twitter Favourites
4,136 Tweets

WJS

WJS

WJS

000112

ANNEXURE 'H'

Sworn statement of Mr Jacobus Hercules van der Merwe dated 2020-01-26

SWORN STATEMENT

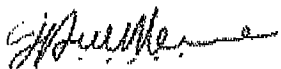
I, the undersigned Jacobus Hercules van der Merwe, with ID No. 660313 5025 083 residing at 50 Gouws Avenue, CENTURION and with telephone number +27 82 444 4911, state under oath in English as follows:

1. I am the father of Michelle van der Merwe, and her two brothers, one of whom is Jacobus (junior) van der Merwe. I used to be married to the mother of my children, Mrs Cornelia van der Merwe. I have been advised of the alleged sexual assault by a certain Mr Tony Beamish against my daughter at her home on or about 31st May 2019 and the subsequent events thereafter which have culminated in Michelle applying for a protection order against Beamish. I have tried very hard to stay out of the volatile situation that prevails between my daughter, her mother, her brother and her alleged abuser. However, when I heard that her alleged sexual abuser has apparently given her two months to move out of her home, I decided that enough is enough.
2. I therefore want to explain the situation with regards to the house, located at Domicile, Eldoglen, in Centurion, where Michelle lives, which is a house I bought in 2007 for the sum of R1,138,325.50. In terms of the divorce order between myself and my ex-wife, she (my ex-wife) was supposed to pay 50% of the cost of the house, which she has not done. She has paid only an amount of R45,473.31, whereas I have paid the balance and therefore have a claim, not only for my share of the house, but also against my ex-wife's share as well, as she owes me that money. I had to continue paying, in order to ensure my children had a roof over their heads.
3. Furthermore, a couple of years ago, I wanted to sell the house to recover what is owing to me. However, I could not sell the house, as my ex-wife obtained legal opinion that according to the divorce agreement, as long as any of our children were living there, regardless of if they were now adults or not, I could not either evict her or sell the house. It was after this that my ex-wife induced Michelle to go and stay there, so that I could not execute against her for the money she owes me.



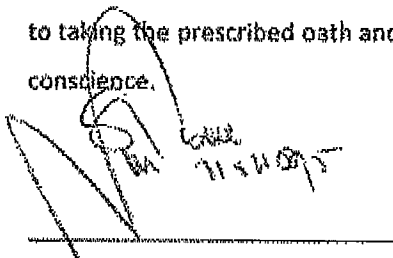
4. I find it therefore saddening that Mrs van der Merwe would attempt to evict our only daughter, in favour of a man that has allegedly sexually assaulted her. I can only believe that she has been put up to this by the person that stands accused.
5. I accordingly and irrevocably give consent now to Michelle to live in 'my' house, paid for by me, but registered in both mine and my ex-wife's names, until such time as Michelle is able to stand on her own two feet, or 31 December 2020, whichever comes first.

I know and understand the contents of this statement. I have no objection to taking the prescribed oath, which I consider binding on my conscience.

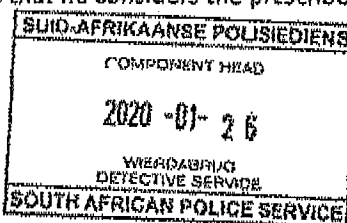


Jacobus Hercules van der Merwe

Thus done and signed at WIERDABRUG, on this 26th day of JANUARY 2020, the deponent having acknowledged that he knows and understand the contents, that he has no objection to taking the prescribed oath and that he considers the prescribed oath to be binding on his conscience.



Commissioner of Oaths



IN THE MAGISTRATE'S COURT FOR THE DISTRICT OF TSHWANE CENTRAL
HELD AT PRETORIA

APPLICATION No. HA 1715/2019

In the matter between:

Michelle van der Merwe

Complainant

AND

Anthony Kilroy Beamish

Respondent

SERVICE AFFIDAVIT

I, the undersigned,

MICHELLE VAN DER MERWE

do hereby make oath and state that:

1. I am an adult female and the Complainant in this matter.
2. Save as may otherwise be stated herein or as may appear from the context, the facts herein deposed fall within my personal knowledge, and are to the best of my knowledge and belief both true and correct.
3. On **13 January 2020 at 10:02** I emailed the below documents to my mother Cora van der Merwe, requesting that she give them to the Respondent:
 - 3.1. my Supplementary Affidavit dated 22 December 2019
 - 3.2. my Supplementary Affidavit dated 12 January 2020

The email is attached as "MVD - 1".

4. On 26 January 2020 at 16:41 I served by email a further Supplementary Affidavit dated 26 January 2020 to the Attorney for the Respondent, Graham Houston. The email is attached as "MVD - 2".

I know and understand the contents of this declaration.

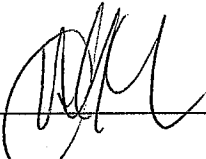
Yes

I do not have any objection to taking the prescribed oath.

No

I consider the prescribed oath to be binding on my conscience.

Yes



DEPONENT

I hereby certify that the deponent acknowledges that she knows and understands the contents of this declaration. This declaration was sworn to before me and the deponent's signature was placed thereon in my presence at Pretoria on 29TH of JANUARY 2020.

Am 7235924-2 CS
Richard P. Sibande

COMMISSIONER OF OATHS

SUID-AFRIKAANSE POLISIEDIENS
COMPONENT HEAD
2020 -01- 29
WIERDABRUG DETECTIVE SERVICE
SOUTH AFRICAN POLICE SERVICE

117
"MVD-1"



Michelle van der merwe <mvandermerwe77@gmail.com>

Supplementary affidavit 12Jan 2020

1 message


Michelle van der merwe <mvandermerwe77@gmail.com>
To: Cora van der merwe <coravdmerwe@gmail.com>

Mon, Jan 13, 2020 at 10:02 AM

Sien asb dat hy hierdie ontvang omrede ek geen kommunikasie met hom wil he nie.

Sent from Mail for Windows 10

2 attachments

 **Commissioned suppl affidavit 12Jan 2020.pdf**
87K

 **Supplemental affidavit 22 Dec 2019.pdf**
1425K

118
"MUD-2"



Michelle van der merwe [REDACTED]

Your client Mr AK Beamish

1 message

Michelle van der merwe [REDACTED]

Sun, Jan 26, 2020 at 4:41 PM

To: Graham Houston <ghouston@fwbattorneys.co.za>

Bcc: Paul O'Sullivan <Paul.osullivan@poaa.za.com>, Sarah Trent <sarah.trent@poaa.za.com>, Ashley Brosnan <ashley.brosnan@poaa.za.com>

Dear Mr Houston,

WITH PREJUDICE

I refer to your mail to me of 2020-01-16 and my reply thereto of 2020-01-20.

I record that you did not have the courtesy, or decency, to reply to my mail of 2020-01-20. I suspect that is because you realised that your strategy of pretending to act for my mother whilst you were truly acting for my abuser had back-fired.

You then show your true colours when you come out of the closet as my abuser's attorney, the deception having been dropped.

To make matters worse, you even become an accomplice of my abuser, by demanding that I waive my Constitutional right to confront my abuser, by withdrawing the criminal charges.


I regret that Mr Looock is no longer able to act for me so, to be on the safe side, I hereby serve my Further Supplementary Affidavit on you.

I still tender to settle the protection order application, on the terms set out in paragraph 47 of the attached.

If your client wishes to settle on those terms, kindly revert to me.

All rights reserved.

Sent from Mail for Windows 10

 Further Supplemental Affidavit M van der Merwe 2020-01-26.pdf
3469K