

**IN THE DISTRICT COURT OF NEW ZEALAND
NORTH SHORE REGISTRY**

CIV - 2016 - 044 - 001219

IN THE MATTER

of an application for a restraining order pursuant to
Sections 15 and 16 of the Harassment Act 1997.

BETWEEN

OLIVIA BAKER of 17 Huntington Drive, Greenhithe, Auckland

Applicant

AND

KARL ROE of [confidential address due to concern for safety]

Respondent



AFFIDAVIT OF KARL ANDREW ROE IN SUPPORT OF;

- [1] THE NOTICE OF DEFENCE TO APPLICATION FOR RESTRAINING ORDER, AND**
- [2] APPLICATIONS TO HAVE THE COURT HOLD THE APPLICANT IN CONTEMPT FOR PERJURY,**
- [3] THE COURT GRANTING OTHER SUCH RELIEF AS SOUGHT BY THE RESPONDENT AGAINST THE APPLICANT, AND OTHERS**

Dated 3 November 2016

Karl Roe
[confidential address due to concern for safety]
karl.andrew.roe@gmail.com
022 609 0069

Counsel for Applicant
Mr Gloyn
PO BOX 317038
Birkenhead
Auckland

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Affidavit of Karl Roe in support of Notice of Defence, and intended applications.

I Karl Andrew Roe ~~swear~~ ^{affirm};

1. I am Karl Roe of Auckland tinting technician. I have worked as a tinting technician since leaving High School. I had only worked for Tint-a-Car until I was dismissed by the applicant and her husband on the advice of Matthew John Blomfield for allegedly entering a computer for a dishonest purpose.
2. I have read the affidavit of Olivia Baker sworn 19 September 2016, and have viewed the annexures "A" through to "G". I authored the Notice Of Defence to Application for Restraining Order dated 1 November 2016. I rely on its contents in relation to the statements made in defence of the false claims made by those that were involved in providing the contents of the perjurious affidavit of Olivia Baker.

Some initial background to explain the involvement of a non-lawyer Mr Matthew Blomfield, who pretends to be a lawyer.

3. Mr Blomfield is a personal friend of the applicants husband Craig Baker. I have a suspicion that their friendship may have become intimate hence the aggressive and dishonest behaviour of Mr Blomfield, and which behaviour has likely led to the applicant being bullied into perjuring herself in her affidavit filed in support of her unwarranted application which she seeks to obtain by fraud.
4. The applicant, prior to the end of our intimate relationship had informed me that she was of the same belief as to the nature of the relationship between Mr Blomfield and her Husband. This discussion was on 18 May 2016 at the Hilton Brown swimming centre car park on the Northshore. The applicant had facebook messaged me wanting to discuss something urgent.
5. I travelled to the carpark and she arrived some time later. She accused me of being unfaithful to her, and she stated that Mr Blomfield was fucking her husband and I was fucking other girls in Christchurch. When she left she said that I was dead to her.
6. The last time I had contact with the applicant was outside the Countdown Supermarket at Hobsonville Road, Hobsonville, Auckland, where she referred to me, when I passed paying her no attention, as a "creep", and that "I should go fuck my whores". I had turned to the applicant and said "Libs not in front of the kids". The applicant was referring to when she had been told by someone that I had been sleeping with numerous women when I had travelled to Christchurch. The applicant is a heavy drinker, and had drank during work, and whilst she was driving. She stated that her BMW x5 would never be stopped by the police.
7. It was this belief about the nature of her husbands relationship with Mr Blomfield and other men that resulted in the applicant becoming distraught, and abusing me on the telephone and by text.



8. I annex as documents marked "**KR1**" some of the texts that I received from the applicant in recent months. These messages relate her thoughts that I had slept with other much younger successful business women when I was in Christchurch, and that her husband had been sleeping with men inclusive of Mr Blomfield.
9. Whilst I would not have previously referred to the applicant as a dishonest person, I have no option but to do so now, following the filing her completely fabricated affidavits content. The applicant and I had a virtually full time domestic relationship for a period of two years.
10. I annex as the document marked "**KR2**" text messages between me and the applicant wherein it is agreed that we should end our two year relationship, and where the applicant says its fine that I am able to get a girlfriend. This is on 28 January 2016.

Homemade weapons [paragraph. P12 of applicants affidavit]

11. As an example of the lies that the applicant has been made to state under oath is the allegation [through insinuation] that I may have been responsible for the manufacture and concealment of what she alleges to be "homemade weapons that [she] believe[s] belong to [me]".
12. I ask the Court to note that the allegations were not made when the weapons were allegedly found, nor is a date given as to when they were found, nor was the matter reported to the police at any time, nor mentioned at my dismissal. With the exception of exhibit "**E**", I do recognize the weapons though as being weapons that Mr Blomfield used to carry around in an Australian import Landrover defender, which I had worked on.
13. I hold an endorsed firearms licence and have a collection of firearms. I obtained this firearms licence in early 2012, and have never had a problem.
14. I have never had any issue in relation to my carrying, storage, or use, of any of my guns. I believe that the applicant would not know what a "homemade" weapon was, and that these weapons were Mr Blomfields, and were photographed by Mr Blomfield. I annex as the document marked "**KR3**" news media stories which disclose that an armed man came onto Mr Blomfields property, and tried to kill him over some "business" issue. It is my opinion that the attack on Mr Blomfield must have been as a result of feuding between gangs, or persons associated with gangs.
15. I have no reason to make or conceal such weapons at my previous work. It is just a hackneyed attempt at creating a foundation for the Court to consider me a person to be feared by the applicant. Mr

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Blomfield would be carrying around such weapons to protect him from creditors from his many failed businesses that left him adjudicated bankrupt and declared a banned director leaving hundreds of thousands of dollars owed to staff, and millions owed to banks, the IRD, and business associates.

16. I do not believe that these were found by the applicant, and that she is fully aware that she has attempted to deceive the Court.
17. I believe that Mr Blomfield is fully aware that a protection order would result in me having my firearms license revoked. I repeat that I do not believe that the applicant would have been capable of committing perjury without being pressurized and I feel it has something to do with the demise of her business due to me having to react [defend my reputation] to Mr Blomfield spreading rumours about me being a pervert and a stalker of the applicant when she was a faithful wife, and I was a creep that had entered the family computer, and business computers, and stolen property etc.
18. I refer the Court to page 4 of the annexures [of exhibit "KR1"] wherein the applicant implores that I should not go to Ford [as that would cut off a third of there business [which would plummet them into losses].



Mr Blomfields past dishonesty on companies office records and other documentation that is publicly accessible.

19. Knowing that the applicant and the applicants husband were unlikely to want to perjure themselves, or to deny what has occurred given what they know has occurred, I concluded that I needed to do more research on Matthew Blomfield. What I uncovered did not shock me given his business and personal reputation, and his threatening and aggressive presence and behaviour towards me. Then there is the constant lies he tells about his friends in the Judiciary, the police and criminal gangs. Annexed as the document marked "KR4" is a true copy of a letter I obtained from a public source. It is signed by Mr Blomfield and confirms his status and lack of business acumen. Annexed marked "KR5" is a report of the liquidator of Plan Z Limited dated 24 November 2014 wherein the highly respected forensic account concludes on pages 7 and 9 respectively;

In my opinion Mr. Blomfield has committed serious breaches of the Companies Act and these will be reported to the Registrar of Companies with a recommendation for investigation and prosecution.

Further I am of the opinion that Mr. Blomfield received funds from the Plan Z without claim of right, disbursing these for his own (and possibly others) personal benefit. I am of the opinion that such conduct amounts to "theft by a person in a special relationship" as defined by section 220 of the New Zealand Crimes Act 1961. This section of the Crimes Act states

(1) This section applies to any person who has received or is in possession of, or has control over, any property on terms or in circumstances that the person knows require the person—

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(a) to account to any other person for the property, or for any proceeds arising from the property; or

(b) to deal with the property, or any proceeds arising from the property, in accordance with the requirements of any other person.

(2)

(3)(4)

Every one to whom subsection (1) applies commits theft who intentionally fails to account to the other person as so required or intentionally deals with the property, or any proceeds of the property, otherwise than in accordance with those requirements.

This section applies whether or not the person was required to deliver over the identical property received or in the person's possession or control.

For the purposes of subsection (1), it is a question of law whether the circumstances required any person to account or to act in accordance with any requirements. (underline added)

In regard to Mr. Blomfield, any indebtedness that Mr. Blomfield had in relation to the proceeds of sale from Canongate, back to Plan Z would be captured in Mr. Blomfield's bankruptcy. Mr. Blomfield was discharged from bankruptcy on or about 23 July 2013. However, bankruptcy only relates to civil debts and is not absolution for criminal conduct. **As I have stated earlier in this report, it is my belief based upon my investigations and the admissions of Mr. Blomfield, that the conduct of Mr. Blomfield in receiving the proceeds of sale from Canongate into his personal bank account and thereafter dispersing those funds other than to the company to whom they belonged, constitutes a criminal offence of theft by a person in a special relationship.**

20. This report is not the only report about the behaviour of Mr Blomfield and others that he is involved with that disclose that he is inherently dishonest and commits perjury as if it was similarly to going to the local Hotel. In another public document Mr Blomfield is recorded as hiring private detective heavies in order to steal another \$100,000.00 from yet another business, which money he defrauded and placed into his own bank account. These stories were on numerous websites where documentation is clearly shown proving the allegations. The allegations prima facie establish that Mr Blomfield perjures himself and suborns the perjury of others for court cases in the High Court where he is suing those that are brave enough to confront him about his criminal practices. Annexed marked "KR6" is the image of Mr Blomfields lawyer Mike Alexander.

21. In High Court documents that are all publicly available it can be proven that Mr Blomfield misleads Courts all the time. In one case he left the following statement out of a Will say document, whilst alleging that the document he presented to court proved that his lawyer was going to give evidence contrary to the statement below which proved that Mr Blomfield stole the \$100k involved, and that Mr Alexander would have to inform the court of the truth, and in doing so prove Mr Blomfield as a liar;

3. If Mike is subpoenaed to give evidence and you lead evidence from him in relation to the matters set out in your Will Say statement then his evidence is likely to be broadly in accordance with what you have written. **However, as discussed there is one area where Mike will have to explain (if relevant to the**

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evidence led or on cross examination) that it was originally understood that your intention was to direct the money from the endorsed cheque to an account to hold it for the company in which you held an interest (Infrastructure).

Infrastructure was (we understood) having its cash resources denuded by the other shareholder by what was considered to be unlawful means and not for the benefit of the company. In the end you did in fact use the money from the cheque you endorsed for your own purposes rather than for the purposes of the company.

Good luck at the Judicial Settlement Conference

Regards

JOHN HEIMSATH PARTNER

22. Annexed marked "KR7" is an email to Mr Blomfield where a dishonest private investigator is colluding to set up an innocent victim of Mr Blomfield, wherein Mr Blomfield did steal the cheque, and cash it without claim of right. I understand that this matter is part of a further investigation into Mr Blomfield.
23. Annexed as the document marked "KR8" is a copy of a Police statement made by yet another victim of Mr Blomfields that was, much like the applicant and the applicants husband drawn into a matter where Mr Blomfield inveigles them into doing dishonest things, and they have to pay Mr Blomfield enormous fees which he charges out as \$450.00 when he pretends to be a lawyer. Annexed as the document marked "KR9" is a story on the media website Whale Oil about operation Kite. All in all Mr Blomfield and his associates stole around \$200,000.00 from Mr Mattu.
24. Annexed as the document marked "KR10" and "KR11" are two transcripts of tape recordings of Mr Blomfield making admissions as to doing really bad things, and admitting that he did everything he could to destroy people.
25. Exhibit "KR11" is a transcript from conversation Mr Blomfield he had with Cameron Slater, and "KR10" is a conversation Mr Blomfield had with Mr Shiv Mattu, after he had learned that Mr Mattu had gone to the Police about Mr Blomfields dishonest practices.
26. All of this material is publicly available on the Internet. I am sure that both the applicant and the applicants husband are completely unaware of Mr Blomfields true pedigree as a conman and violent and threatening commercial predator. In the Cameron Slater recording Mr Blomfield is alleged to say about making false complaints to the Serious Fraud Office about others to cause his victims public embarrassment;

CS: So why, why, that's fine that you accept that you fucked it up. I mean everybody's fucked things up, I've fucked things up I had a company that went under. **But what I didn't do was go and and um spread murk by ah helping journalists write stories while I was still taking money from that organisation.** What I didn't do was umm go and lay ...

MB: I, I understand ..

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CS: **...complaints with the Serious Fraud Office which were had no merit or basis of foundation, umm and I certainly didn't collude with people umm that were in regulatory authorities around creating bad publicity for other people.**

MB: **And I, I, I, I appreciate that.** Look umm there's a whole other side to this story and whether you wanna hear it or not I mean the guts is ..

CS: No, well we've seen the other side of the story because it's all been in the media, because you've nicely fed Bevan Hurley and Hazel Phillips and various other different people, that paint Warren Powell as, as some sort of a bad bastard. Now I've never met Warren, haven't spoken to him, wouldn't have a clue about him but what I'm seeing is something that's completely different from what the public has been told before. And that's why I'm running this story because it because...

MB: Yeah no and and and

27. In relation to the stolen \$100,000.00 cheque in operation Kite, Mr Blomfield relates the following about how he initially denies he took the cheque, and then admits that he took the cheque, endorsed it fraudulently, and then transferred the money to his personal account, and spent it, with the bank finally reversing it, and Mr Blomfield having judgment entered against him for the total sum of the theft.

CS: Yeah, this is the same lawyer that advised you how to launder a stolen cheque that you obtained through Operation Kite, what's your explanation for that?

MB: Well ahh that wasn't a stolen cheque, 'cos at the time that I picked up the cheque it was um, I was a director and shareholder of the company.

CS: Well that's not what the bank said and they won a court case..

MB: No, there wasn't a court case around that cheque.

CS: Well do you want me to publish the umm documents surrounding the court case that around that cheque?

MB: No nah, no that umm understand I'll walk you through that if you like ...

CS: Yeah sure, i'm just really fascinated by Operation Kite and the ...

MB: Yeah yeah, no that's all right I'll explain what happened. So myself and Paul Claydon owned a company called Infrastructure NZ together ok..

CS: Yep

MB: ...and we were both directors and shareholders of that company, and when I started going under he decided that he didn't want to be in business with me anymore..

CS: Yep

MB: ...and what he did is he set up a new company..

CS: Yup

MB: .. called um Infrastructure and Contracts Limited.

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CS: Yeap got that.

MB: ... and he started banking all the money, all the cheques from the councils made out to Infrastructure NZ Limited into Infrastructure and Contracts Limited...

CS: Yup

MB: .. ok so, I then went to the bank and hey bank, and no doubt you've got the email, I said you're on notice that you need to stop allowing him to bank cheques into the wrong bank account...

CS: Yup

MB: ... umm because under the cheques act you obviously can't bank a cheque made out to someone else into your account ..

CS: Well you can because you've got the advice from Mike Alexander that showed how you can do that.

MB: Well you can endorse a cheque into the account, but I endorsed and what the bank did is reversed that cheque.

CS: Yup .. And they won a case surrounding that 'cos you sued them and you lost.

MB: No, I didn't sue them about that..

CS: What was that court case then about with the ASB?

MB: The court case with the ASB was that um I banked a cheque into my account, they reversed it, and then they pursued me for the money umm .. for the amount ..

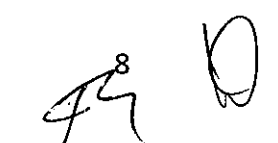
CS: So, you just told me a lie, you said that that court case wasn't about that cheque and it actually was about the cheque.

28. I ask the court to note that the matter of "Operation Kite" mentioned in the above conversation between Mr Blomfield and Mr Slater relates directly to the contents of the exhibits marked "**KR7**" and "**KR9**", although Mr Blomfield did not put the money in any form of escrow account and in fact cashed it and spent the money on himself.

29. The name in the transcript of *Mike Alexander* is the same lawyer whose image is found on the exhibit "**KR6**", and who was relatively honest about what Mr Blomfield had done in stealing the cheque, which Mr Blomfield had falsely asserted had not occurred when providing the Court with an abridged "will say" statement to the Court without Mr Alexanders knowledge. See Paragraph 11 above when Mr Alexander, through another partner of the firm, clarifies in reply to Mr Blomfeild;

However, as discussed there is one area where Mike will have to explain (if relevant to the evidence led or on cross examination) that it was originally understood that your intention was to direct the money from the endorsed cheque to an account to hold it for the company in which you held an interest (Infrastructure)..... In the end you did in fact use the money from the cheque you endorsed for your own purposes rather than for the purposes of the company.

Good luck at the Judicial Settlement Conference



30. In the following part of the transcript of the conversation between Mr Slater and Mr Blomfield Mr Blomfield admits to the same behaviour that he has perpetrated against me;

MB: Yeah but dude, (sighs) you know the big, the big thing for me personally that last thing I want everyone to you know, mate, **I am really dark at Warren, there's no doubt about it. I fucking did everything in my power to try and fucking and slam him to the wall**, and on the flip-side he did everything in his power to slam me into the wall. **We hated each other**, we were two mates who both felt hurt that the other one fucked ..

CS: I'm not sure that that's accurate, I mean I think it's accurate that you've done everything that you can to slam Warren Powell to the wall, but I haven't seen any evidence that Warren Powell's done anything in return other than cut you off from the drip feed.....

.....CS: Well it's clear to me, it's clear to me from all of the email correspondence that everybody involved with Hell **is a little bit fucked in the head, and that you're all busily stabbing each other in the back, while all pretending to be good mates. And that's, that's the overwhelming impression that I'm getting from everything here.**

MB: And, and, to be I couldn't agree with you more. I mean the worst, if I was to take 5 years of my life and remove it from my head it was the time I spent there working at Hell Pizza. And I, I mean I've discussed with a lot of people **I was just soul destroying, I behaved badly, I did shit that I wish I hadn't of done,** everyone was into everyone else, no-one trusted each other. It was just a bad place to be for that period. It was the fucking horrible, horrible place and I don't disagree with you man, it's, dude. I can't tell you enough how much when I read this shit, I mean when I read your initial email that came out that's what sorta triggered this 'cos I had it forwarded on to me..

31. Following on from these admissions by Mr Blomfield about his nature, and how he tends to handle matters, the following is an excerpt which discloses Mr Blomfield initially denying his violent streak and then admitting to Mr Slater to assaulting a bailiff of the Court. He also admits to making vicious attacks;

MB: Dude, who have I attacked apart from Warren Powell? Who's the other victims of my vicious attacks?

CS: Ahh well that'll all come out in the next few days.

MB: In the last 10 years I mean ..

CS: Well you bashed one guy up that you didn't agree with.

MB: I bashed one guy up?

CS: Yeah.

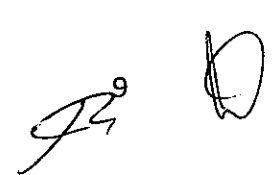
MB: Who did I bash up?

CS: Oh well it's on the blog, I've got your Police record for it.

MB: Who did I bash up?

CS: I can't remember his name now, but I've put the pdf on the site. You got charged with it, you had to write a letter of apology, I've got a copy of that too.

MB: (long silence) I bashed someone up, how many years ago was that?



CS: Well ahh it's reasonably recent, you know..

MB: Are you sure?

CS: Am I sure? Yeah I'm sure I've got the file from the Police.

MB: no that's all right, I'm happy to have a look at that I, I ummm, so...

CS: You, you basically got diversion 'cos you offered to write a letter of apology and you wrote a letter of apology.

MB: Um it woulda been, would've been a first offence.

CS: Yeah, but you still bashed somebody.

MB: Ahhhh, ahhh so where is that on your site?

CS: It's, it's, it's on the link on the word psychopath.

MB: Ohhh Matt is a psychopath, ok ...

MB: I've never um seen my Police record.

CS: Yeah well you have.

MB: Matthew John, assault, (unintelligible), diversion, victim support, North Shore...

CS: You don't remember that?

MB: No, I do remember it. I know exactly what it was.

CS: So you were blowing smoke up my ass 5 minutes ago when you were going 'oh who've I bashed up, I haven't bashed anybody up'. And now you've seen the documentary evidence suddenly you remember exactly what the details are.

MB: Yeah, do you know what I did... I pushed the bailiff, and I'm not talking about assaulting, I pushed the bailiff and ...

CS: That's not usually a winning proposition pushing a bailiff.

MB: No, no well I learnt that (laughing) I learnt that, I pushed the bailiff and when I say pushed I in no way hurt the bailiff. And then about probably, shit it musta been an hour later the Police turned up and said if anyone ever lays a hand on any court, court agent we have no choice but to charge you with assault. And I went oh bummer, so I ended up getting charged with assault for pushing a bailiff.

32. On the internet there are other documents which indicate that Mr Blomfield regularly threatens people with his, and his brothers, association with the Head Hunters gang, and, that these victims have been subject to false allegations made by Mr Blomfield to the Police, the IRD, and that Mr Blomfield has involved himself in making false allegations of infidelity against men in order to destabilize and cause the end to marriages involving children, in order to have the husband give up litigating against Mr Blomfield for sums owed to them by Mr Blomfield.

33. There seems to be numerous complaints of Mr Blomfield pretending to be a lawyer, as he initially did

with me, and stealing large amounts of monies as a result of that trust.

34. It is also stated that Mr Blomfield extorts money from persons who have followed his advice to commit to a 'sharp practice', and he then threatens them with informing the authorities.
35. In relation to the other transcript that relates to a businessman [Mr Shiv Mattu] that laid a complaint of theft, blackmail, and threatening behaviour against Mr Blomfield, [exhibit "KR8"] I believe it is clear in the conversation that was recorded and which is on the Internet, that Mr Blomfield is admitting to conspiring to defraud the IRD of hundreds of thousands of dollars in order that he and his associates were paid many tens of thousands of dollars in fees, for basically getting the victim to steal money property of the IRD by placing it into Mr Blomfields lawyers account, and then Mr Blomfield stealing that money from the businessman [Mr Mattu] when Mr Mattu was powerless to do anything about it.
36. I am aware that once that occurred Mr Blomfield would start to steal other assets belonging to the businessman. Mr Blomfield obtained \$27,000.00 in untraceable cash, when saying that he could bribe IRD and Police Officials, and then stole a boat from Mr Mattu, when Mr Mattu was being chased by the IRD as a result of committing to Mr Blomfeilds advice. I am aware that Mr Mattu was finally bankrupted by the IRD.

BLOMFIELD 00:00 *Greg Sheriff emailed me on Friday and in the email they talk about a private prosecution against me. Against me, Graham and Bruce. But then in the email they go on to talk about prosecuting you as well, and I just wondered are you working with these guys, because if you're working with these guys, why are they talking about prosecuting you?*

MATTU 00:45 *I am working with nobody. My answer is simple as that, what have been done to me and just trying to sort it out. It happens whatever now, but you guys have done a great job for me. In the first place, you, Graham, Bruce, everybody, what was that for? What's wrong did I do to you guys that you guys put me in such a situation where I'm struggling for my life? You guys never thought of my kids. They're going to suffer too. You tell me about it, Matt. What wrong did I do to you guys? [crosstalk] the situation.*

BLOMFIELD 01:35 *Didn't do any wrong to me.*

MATTU 01:37 *Sorry?*

BLOMFIELD 01:38 *You didn't do any wrong to me, Shiv.*

MATTU 01:41 *Then what wrong I did to anybody, Bruce, Jonathan, Ben, you. If I didn't do anything wrong, why you guys rip me off? But one thing in [?].*

BLOMFIELD 01:56 *Shiv--*

MATTU 01:56 *Tell me about it, Matt.*

BLOMFIELD 01:57 *Shiv--*

MATTU 01:59 *Yes.*

BLOMFIELD 02:00 *I helped you with Grant Thornton to do a deal with the IRD.*

MATTU 02:05 *You didn't help me, you didn't help me. You help yourself.*

BLOMFIELD 02:10 How did I help myself?

MATTU 02:11 You help yourself. You didn't help me. You help yourself. How did you help me? You told me that everything will be sorted out. I [inaudible] me, what for? If you have sorted out everything, why he's still chasing me? When you took that money in cash? **Even to talk about \$30,000 and paying \$27,000 in cash. You told me that will be the payment. No other fee will be charged to me. Why are the payments have charged to me? Tell me about that.**

BLOMFIELD 02:50 **Hey, Shiv, if you were to turn back time, and you had not met me, then you quite simply would have paid \$400,000 for the IRD.**

MATTU 03:01 Yes, that's fair enough. That's fair enough. **At least I could have gone to the IRD, I would have not left with any money, but that at least, this drama should have not happened to me, but has happened in last two years.**

BLOMFIELD 03:14 But [crosstalk]--

MATTU 03:15 **I asked for [crosstalk]. I asked for advice from a lawyer and this is what you did to me.**

BLOMFIELD 03:26 **Hey, Shiv, mate, seriously, I never said to you I'm a lawyer.**

MATTU 03:35 You told me. You introduced yourself as a lawyer to me.

BLOMFIELD 03:39 Okay. So there you go. So you're willing to lie to me right now, because you know I never introduced myself to you as a lawyer.

MATTU 03:45 **After [?] introduce yourself as a lawyer, and I when I met you in the first place you handed over me a card, right? Which unfortunately, I'm not carrying at the moment, either way it's gone.**

BLOMFIELD 04:00 Hey, Shiv, **I'm not going to argue with you** on this [crosstalk].

37. I ask the Court to note that Mr Blomfield pretending to be a lawyer is a regular allegation against Mr Blomfield, with Mr Blomfield charging up to \$450.00 an hour. I annex as the documents marked "KR12" copies of a Police file that is found on the Internet. From this document it appears that Mr Price and Mr Blomfield both accept that Mr Price gave an affidavit for proceedings against Mr Slater by using coercion that if he did not Mr Price would be sued by Mr Blomfield for defamation. From this I believe that the contents of the coerced affidavit were likely untrue, as the contents of the applicants affidavit are untrue in this proceeding. Mr Blomfield also alleges to the Police that he has good friends who are "judges". This is another tactic employed by Mr Blomfield when he threatened me.

The perjury in the affidavit of the applicant, and the evidence that I did not want to give, but have to, in order to prove that the applicant, the applicants husband, and Mr Blomfield, are attempting to obtain an order of this court by perpetrating a fraud on this Court.

38. I am truly saddened to have to provide this evidence to this Court in order to prove my innocence to the false allegations leveled at me, and to prove to the criminal standard of beyond reasonable doubt that the applicant perjured herself, and that this perjury was suborned by her husband and Mr

Blomfield.

39. As stated, I was in a two year domestic relationship with the applicant, which involved being in love in the normal manner of such relationships. But there was a side to the relationship, or moreover to the "love quadrangle" that I suspect is unique.
40. I had a reasonably normal life and had had normal relationships with my previous partners until I became embroiled in my relationship with the applicant. Having moved on to a normal healthy relationship I am glad it is over. The relationship commenced after the applicant had asked me to assist her to prove that her husband was in her words "a faggot". However prior to us commencing a sexual relationship we did enjoy an emotional connection beyond mere friendship.
41. The applicant knew that her husband was bisexual at a minimum, and more likely homosexual, and that her husband had a used panty fetish. She was aware that her husband was sleeping with numerous other men that he did not know socially, and that one of these men was Mr Blomfield. The applicant told me about an older male travel agent in Parnell and a 63 year old male that was referred to as her husband's "silverback".
42. I did not suspect that her husband was homosexual, but was aware that he was having affairs due to his comments to me, and others at work, and that he would parade certain women around work, and take them to lunch etc.
43. I was aware of numerous affairs that he had had with local wives. One wife was Erin Spencer, and another wife was Biddie Cooksley. One of their husbands works for North Harbour Ford Mazda, and the other is still the owner of Oscar and Co in Takapuna. At this stage I kept my nose out of everything and enjoyed my work.

The day that I was invited to assist the applicant trawl through her household computer, and found the material to support her leaving her husband.

44. The applicant brought the computer into work and she asked me to look through the computer to see what I could find. On the surface the computer looked as if it had no secrets. However upon searching the file system I found that other web browsers had been installed, but were not available to the applicant, or any other user other than the user that installed them.
45. I opened the browsers cache folder where the most recent material would be stored from browsing the web, and found material that was objectionable, illegal, degrading, disgusting, and explicit, as well as material of a highly personal nature depicting;
- 45.1 downloading and storing child pornography imagery

- 45.2 the applicants husband cross dressing,
- 45.3 having a sexual fetish around human and animal fecal matter [scat],
- 45.4 having an interest, and engaging in homo-erotic and transvestite play.
- 45.5 communicating with like mind men and transvestites on the internet
- 45.6 comparing accounts of how he stole womens underwear from his wife, his wifes mother, his brother in laws wife, and wore them when masturbating alone or with a group of men, and transvestites at his family home whilst his wife was away during the day.
46. I annex as the document marked "KR13" an image that I was asked by the applicant to download. The applicant confirmed that this was the applicants husbands penis protruding from a pair of white panties she had purchased a few weeks earlier, and which she could no longer find.
47. The applicant made me go through the process numerous times so that she could repeat it without my input. The applicant locked the doors during this process.
48. I informed the applicant that she could take a record of this material by using a USB flashdrive and if she wanted she could up date the material as required. The applicant was seething about the child pornography, and I asked if she wanted me to stay or leave her alone as she was becoming very upset.
49. Personally I felt quite emotional for a number of reasons. Firstly I knew that I cared for the applicant and did not want to see her distraught, but secondly I was very concerned about the child pornography aspect to the applicants husbands perversities.
50. The applicant asked me to print off two copies of all of the material, and to find a USB drive and copy the material to it for her. I told her that I did not want to become more involved and she stated that it was the family computer and she owned it.

The relationship started at Wainoni park

51. After the discovery of the material she began to flirt with me and one evening she phoned me and asked me to meet her urgently at Wainoni park, Greenhithe. I did so and she stated that she wanted to have sex as her marriage was fucked. I turned her down, but gave her a cuddle and stated that I was there if she needed me. After leaving her I considered leaving my employment.
52. Over the course of the next few days the applicant repeated the urgency of needing to see me because it would get her out of the house as she hated the sight of her husband. I would pick her up with her husbands knowledge and we would go to bars and talk.

53. At one of these meetings she gave me a USB flashdrive and asked me to have a look at "what the sick fucker is up to", and to hold on to it for safe keeping. She was to repeat this behaviour at other times before her husband found out about our relationship when he accessed her phone without her permission. It eventually became a sexual relationship with the applicant at the Best Western Motel in New Market.
54. When the applicants husband found out about the relationship and how we loved each other, he text messaged me. I annex as the documents marked "**KR14**" the text messages concerned.
55. I was told to leave and threatened that I would be subject to a police complaint about me entering the computer. I did not inform the applicants husband that I had entered the computer with the applicants permission, and that it was the applicant that had been giving me material that she had sourced herself, or using someone else. I was not sacked because I worked for Tint-a-car and that was controlled by the applicant.
56. I was concerned and offered to give the material that I had been given by the applicant back to the applicant and she stated that she wanted to leave the husband, and may have to use the material in a custody battle and he would find the material as he went through all of her things. I did as she requested. This is how I believe that Mr Blomfield knew that I had material that would be grounds for a complaint to the Police. I did not complain to the Police because of my ongoing relationship with the applicant and also for the sake of the children involved, as I did not believe his interest went into actual actions.

Proof of the nature and intensity of our relationship. The good bits.

57. We exchanged many gifts. Some of a loving nature and some involving lust. I bought her lingerie, jewelry, ornaments, and sex toys. She purchased me jewelry, artwork, alcohol, and paid for Hotel and Motel rooms, and meals. I annex as the documents marked "**KR15**" pictures of some of the items I purchased the applicant and messaging between the applicant and me about her wearing the presents.
58. I annex as the documents marked "**KR16**" images that the applicant sent me of her wearing items that I had purchased her, and I annex as the document marked "**KR17**" the text messages where the applicant confirms that she sent those images of herself. I refer the Court to page 118 of the document marked "**KR17**" and the court will identify one of the pictures in "**KR16**". The image on page 112 of the document marked "**KR16**" discloses the applicant standing purposefully in front of a wedding picture of her and her husband. This was as a result of her finding out about the sexual intimacy of her husband with Mr Blomfield, and what they liked to get up to.
59. I annex as the documents marked "**KR18**" images of the applicant giving me falatio at work which was

a regular occurrence. The applicant used these images in her social circles with certain female friends without my permission. She also took images of me entering her in public places, and in public toilets, and asked me to take images using her phone of me entering her anus, or coming on her back, breasts, butt, vagina, neck and on her face. The applicant would also ask me not to masturbate so that I would have more to give her. I refer the Court to the documents annexed marked "KR17" where the applicant refers to "load". This reference is to me having what the applicant referred to as "plump plums for mum".

Burner Phones and specialist deletion applications used by the applicant to keep the applicants husband in the dark about the intensity of our sexual relationship.

60. I purchased a burner phone. Annexed marked "KR19" is the packaging for that phone. The applicant placed apps on her main phone and the burner phone, and then placed the same applications on my phone so that we could send imagery and text to each other covertly. Annexed marked "KR20" is the texting that discloses the use of these applications which one could set a time to delete texts or imagery. I took screen grabs to look at her pictures for longer, and she did the same. Annexed as the document marked "KR21" is the documentation I found on the internet about the application.

Proof of the nature and intensity of our relationship. The bad bits.

61. I annex as the document marked "KR22" the communications around the applicant asking me to come over to hotels that she had booked in order to have intercourse, and stay the night.
62. One of the aspects that I found really bad was when the applicant wanted to have sex when we could so easily be caught, and on one occasion were caught by an elderly lady at Snapper Rock cemetery.

The Snapper Rock Cemetery

63. I annex as the document marked "KR23" text communication in regards to having sex at our normal place when the applicant wanted sex in public.

Sex in garage at home when husband around

64. Annexed as the document marked "KR24" are communications when the applicant wanted sex in her garage when the applicants husband was in the house.

Sex around the house - cryptic messages to inform that applicant wanted sex around house whilst husband home.

65. Annexed as the documents marked "KR25" are communications when the applicant used the words "moke" or "smoke" which gave a time to be outside and have sex.

Applicant wants sex in violation of the trespass order when her husband is in the house.

66. Annexed as the documents marked **"KR26"** are communications when the applicant wanted me to breach the trespass order after my dismissal in order to have sex when her husband was at home. The applicant would discuss having a baby with me, as she hated her husband due to him staying away with Mr Blomfield and other men, and him and them wearing her and her mothers underwear. I was very much aware that the applicant had gotten to the point where she hid her underwear, and had them laundered as they were expensive.
67. The applicant also went on about her husbands visitation of child pornography websites, despite his therapy, and she was somewhat concerned. I annex as the document marked **"KR27"** are images that the applicant gave me on a USB stick, or in hard copy, for safe keeping in case her husband denied the allegations. The marks drawn around the search terms "preteen" on a Russian Site were done by the applicant. She told me that she had seen images in the computer and that they were disgusting. She became tearful and I really didn't know what to do. It was some time later that she decided to leave.

Communications after my dismissal about our love and that she was leaving her husband.

68. I annex as the document marked **"KR28"** the communications between us about her decision to "get out", and how much we loved each other. By this time the applicant was drinking very heavily, and I had concerns for her physical and mental health, as she had stated she didn't want to live anymore. Most crucially these communications were after I had been dismissed for allegedly dishonestly entering computer systems, and I was under investigation by the police, and I had been threatened by Mr Blomfield about being a stalker. I annex as the documents marked **"KR29"** a communication where I inform the applicant that I want to tell her husband about our plans, and informing on his "sick" perversities.

Queenstown

69. After my dismissal I left the applicant alone for a while and it was the applicant that wanted me back in her life full time. We went to Queenstown and she tried to fall pregnant to me, or so she said. We stayed together and she bought meals and drinks and we stayed at the Crown Plaza. I had to leave before 5am in case other franchisees saw me leaving her suite. This was after my dismissal. We drank at the Bardeaux Bar because it was dimly lit and we could kiss each other. She paid for everything on the company Mastercard. We discussed how I would make a good dad given that the applicants girls loved the presents that I had bought them. The girls especially loved the water pistols that I had bought them. I annex as the document marked **"KR30"** text message confirmation from the applicant that this was so.

Other matters that need mentioning

70. At the time that the applicants husband found out about the domestic relationship, and the home computer being accessed by me, at the request of the applicant I was approached by the applicants husband at work, when the applicants husband, according to the applicant, had spent the night with Mr Blomfield, and Mr Blomfield had driven the applicants husband back to work the following morning. The applicants husband was very aggressive towards me in the same manner he was in his texts, and wanted me to resign "or else". Mr Blomfield drove a black defender which I had worked on days prior, tinting the vehicle. When working on Mr Blomfields vehicle the respondent noted that in the vehicle there was;
- 70.1 The smell of Marijuana and there was a large black handled kitchen knife in front of the drivers seat on the floor which I believe matches the knife on a long stick annexed in exhibit "E" to the applicants affidavit.
- 70.2 There were also an assortment of pornographic DVD's, some with large black males on the covers which I had noticed when lifting the rear seats.
71. During this contact the applicants husband stated very aggressively to me that the information that he thought I had obtained, also held information about his contacts with Mr Blomfield over the internet, and that Mr Blomfield, if outed, would come after me. I believe that the invention of the "homemade" weapons likely belonging to me was in order to be able to suggest that what I was to say about Mr Blomfield was fabricated, or retaliatory.]

Mr Blomfield has taken to following the respondent

72. I have seen Mr Blomfield in traffic behind me at numerous times. I have taken clearly evasive routes to see if Mr Blomfield is following me. On one occasion I got out of my car and walked into a shop until I felt that Mr Blomfield had gone. The shop was near my home.
73. The next day I decided to walk to a local café to purchase a cup of coffee. This café was close to the shops that I had pretended to visit the previous evening.
74. When approaching the café I could see Mr Blomfield sitting in the driving seat of a metallic green BMW M3. It was Mr Blomfields car as it was metallic green, had black wheels, and had the number plate JRH137.

75. I walked towards the air base and Mr Blomfield followed me by car and continued to follow me until I was clearly approaching the security gates to the air base. Mr Blomfield then sped away. I believe that I was being followed by Mr Blomfield last Friday from my place of work, and some days earlier I believe that I was being videoed by a person not known to me in my home area of Hobsonville, West Auckland. The filming was made obvious to me and I believe that it was designed to intimidate me.
76. I seek that the Court order third party discovery against the ISP and Phone providers to be able to prove the falsity of the claims of the applicant, and to prove that she was never scared and invented the allegations against me at the behest of the applicants husband and his partner Mr Blomfield. I have nothing to hide in this regard. I have had other personal information that I have not referred to due to the fact that the content is very disturbing and part of the reason why I would never ever consider being anywhere near the applicant, or the applicants family. However I will not be restricted in my movements because, again, I have done nothing wrong, and the applicant and her husband and her husbands partner Mr Blomfield need to seek further counselling as to their sexual behaviours.
77. For my part I am in a very happy domestic relationship with a person from overseas and desire to work hard, save money, so that I can undertake OE with my partner next year. I had been happy in the previous relationship for some considerable time. Annexed as the documents marked "**KR32**" are texts between me and the applicant during times when we were in love in a fully fledged domestic relationship. Initially the applicant was happy with me being able to see other women¹, but then when I did just go out with other women, she had obviously been having me followed, or was very interested in me, and accused me of being unfaithful to her and being a "cunt". I ask the Court to again refer to the documents marked "**KR1**";

Page 1	"I'm so fucken heart broken - not all about ford but about your lies. You told people about us. That hurts me the most - more than anything.
Page 2	"You totally fucked me over. Hope you enjoyed fucking them. Did you think of me while you fucked strippers?
Page 2	"You went to chch and fucked some girl"
Page 2	"Risked everything for you. Nearly left it all... Only to realise you are no better than him"
Page 3	"I wouldn't yet again have some cunt fuck on me"
Page 4	"ok. I'll call it. See how you apparently feel about me - don't go to ford then."
Page 5	"saying you love me and here for me.. Still fucking someone else.."
Page 6	"You cheated - just like him"
Page 7	"You cheat on me too cunt"
Page 10	"You're a fucken creep who broke me yet again"

¹ Page 164 of KR 32

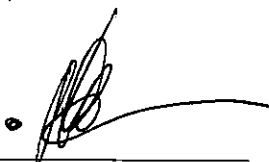
I am.... I've seriously got u out of that hole - I'm Sure I've made you a better person too.... You've grown so much since I've known I you... All in a good way.... I've been so good for you... Your next girlfriend will certainly have it made!!

78. The really sad thing about this is that it was her suggestion that we have a break, and I agreed to that but stayed faithful, although I enjoyed the company of numerous attractive young woman. I believe that given her perjury that she is the classic case of a woman scorned, that has been shown a way with which to get back at me. I maintain that I wanted to find out only why she and her husband and Mr Blomfield were spreading malicious rumours about me being a thief, a pervert, a stalker etc. I never continued to talk to her when she carried on about me being an unfaithful cunt etc. In the end I gave up unaware of what the applicant and Mr Blomfield were up to in relation to taking photographs of me when I was in public places minding my own business. The applicant could never take a picture of me if I was simply not there, or that she was not thinking anything was wrong with my initial approaches attempting to get to the bottom of the rumours being spread around the North Shore about me.
79. If I have not mentioned anything that is referred to in the notice of defence, this is because of the time restraints involved, with my work commitments, and the need to file the documents at this time. I am completely exhausted and cannot sleep at night, and check under my car before going to work. I repeat that I fear for my safety in relation to having to defend myself in these proceedings because the very large Maori server stated that Mr Blomfield had gang connections and that the Head Hunters were looking for me. Given what is on the Internet copied from Police Statements and affidavits of the previous victims of Mr Blomfield, I am concerned that he may try and have me killed. That same fear exists for the applicants husband because he is the partner of Mr Blomfield.

affirmed
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SWORN at Auckland
This 3rd day of November 2016
Before me:

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Registrar of the District Court North Shore Auckland

Tatiana Vinokur-Atkin
Deputy Registrar
District Court
NORTH SHORE

