

**COURT ONLINE COVER PAGE**

**IN THE HIGH COURT OF SOUTH AFRICA  
WESTERN CAPE DIVISION, CAPE TOWN**

**CASE NO: 2025-147568**

In the matter between:

**COMPLIESHIELD FINANCIAL GROUP  
PROPRIETARY LIMITED**

Plaintiff / Applicant / Appellant

and

**RAPTORS INTERNATIONAL  
PROPRIETARY LIMITED, RAPTOR  
CAPITAL PROPRIETARY  
LIMITED, WESLY GRANT HARRINGTON**

Defendant / Respondent

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**Combined Summons**

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**NOTE: This document was filed electronically by the Registrar on 26/8/2025 at 4:08:34 PM South African Standard Time (SAST). The time and date the document was filed by the party is presented on the header of each page of this document.**



**ELECTRONICALLY SIGNED  
BY:**

**Registrar of The High Court,  
Western Cape Division, Cape  
Town**

**COMBINED SUMMONS**  
**IN THE HIGH COURT OF SOUTH AFRICA**  
**(WESTERN CAPE DIVISION, CAPE TOWN)**

**CASE NO:**

In the matter between:

**COMPLISHIELD FINANCIAL GROUP PROPRIETARY LIMITED**

Plaintiff

and



**RAPTORS INTERNATIONAL PROPRIETARY LIMITED**

First Defendant

**RAPTOR CAPITAL PROPRIETARY LIMITED**

Second Defendant

**WESLEY GRANT HARRINGTON**

Third Defendant

---

**TO: The Sheriff or his Deputy:**

**INFORM**

**RAPTORS INTERNATIONAL PROPRIETARY LIMITED**, a private company with registration number 2020/775845/07, duly registered in accordance with the laws of the Republic of South Africa having its registered address at Portion 32, Yellowwood Road, Ruigtevle, Sedgefield, Western Cape, 6573;

(hereinafter called "**the First Defendant**")

**RAPTOR CAPITAL PROPRIETARY LIMITED**, a private company with registration number 2024/285164/07, duly registered in accordance with the laws of the Republic of South Africa having its registered address at 32 Yellowwood

Road, 32 Sedgefield, Western Cape, 6573; and

(hereinafter called "**the Second Defendant**")

**WESLEY GRANT HARRINTON**, an adult male with identity number 781209 5033 081 and director of the Second Defendant employed as such at 32 Yellowwood Road, 32 Sedgefield, Western Cape, 6573.

(hereinafter called "**the Third Defendant**")



**THAT**

**COMPLISHIELD FINANCIAL GROUP PROPRIETARY LIMITED**, a private company with registration number 2023/875870/07, duly registered in accordance with the laws of the Republic of South Africa having its registered address at Trade House, 33 Impala Road, Chislehurst, Gauteng, 2196.

(hereinafter called "**the Plaintiff**")

hereby institute action against the Defendants in which action the Plaintiff claims the relief and, on the grounds, set out in the **PLAINTIFF'S PARTICULARS OF CLAIM** annexed hereto.

**INFORM** the Defendants further that if the Defendants dispute the claim and wish to defend the action, the Defendants shall:

- (i) Within **TEN** (10) days of service upon the Defendants of this summons, file with the registrar of this Court at Keerom Street, CBD, Cape Town, a notice of the Defendants' intention to defend and serve a copy thereof on the attorneys for the

Plaintiff, which notice shall give an address (not being a post office or *poste restante*) referred to in Rule 19(3) for the service upon the Defendants of all notice and documents in this action.

- (ii) Thereafter and within **TWENTY (20)** days after filing and serving a notice of intention to defend as aforesaid, file with the registrar and serve upon the Plaintiff a plea, exception, notice to strike out, with or without a counterclaim.

**INFORM** the Defendants further that if the Defendants fail to file and serve the notice as aforesaid, judgment as claimed may be given against the Defendants without further notice to the Defendants, or if having filed and served such notice, the Defendants fail to plead, except, make application to strike out or counterclaim, judgment may be given against the Defendants.



**AND** immediately thereafter serve on the Defendants a copy of this summons and return same to the registrar with whatsoever you have done thereupon.

DATED AT CAPE TOWN ON THIS THE **26<sup>th</sup>** DAY OF **AUGUST 2025**.

**REGISTRAR OF THE HIGH COURT**

**SWARTZ WEIL VAN DER MERWE GREENBERG INC**  
 Plaintiff's Attorneys  
 3<sup>rd</sup> Floor, One on Ninth  
 Corner Glenhove & Ninth Streets  
 Melrose Estates, Johannesburg  
 Tel: 011 486 2850  
 Email: [david@swvginc.co.za](mailto:david@swvginc.co.za)  
 (Ref: D SWARTZ)  
**c/o ASSHETON-SMITH GINSBERG INCORPORATED**  
 9<sup>th</sup> Floor, Wale Street Chambers  
 38 Wale Street  
 CAPE TOWN  
 Tel: (021) 424 7390  
 Fax: (021) 424 0605  
 Email: [alexander@asg.law](mailto:alexander@asg.law),  
[andrew@asg.law](mailto:andrew@asg.law)  
 (Ref: A. KLOSE)

## COURT ONLINE COVER PAGE

IN THE HIGH COURT OF SOUTH AFRICA  
WESTERN CAPE DIVISION, CAPE TOWN

CASE NO: **2025-147568**

In the matter between:

**COMPLIESHIELD FINANCIAL GROUP  
PROPRIETARY LIMITED**

Plaintiff / Applicant / Appellant

and

**RAPTORS INTERNATIONAL  
PROPRIETARY LIMITED, RAPTOR  
CAPITAL PROPRIETARY  
LIMITED, WESLY GRANT HARRINGTON**

Defendant / Respondent

---

### Particulars of Claim

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**Registrar of The High Court,  
Western Cape Division, Cape  
Town**

## PARTICULARS OF CLAIM

### PARTIES

1. The Plaintiff is **COMPLISHIELD FINANCIAL GROUP PROPRIETARY LIMITED**, a private company with registration number: 2023/875870/07, duly registered and incorporated in accordance with the laws of the Republic of South Africa, with its principal place of business situated at Trade House, 33 Impala Road, Chislehurst, Gaufeng, 2196. The Plaintiff is an authorized Financial Services Provider with FSP No. 53590.
2. The First Defendant is **RAPTORS INTERNATIONAL PROPRIETARY LIMITED**, a private company with registration number: 2020/775845/07, duly registered and incorporated in accordance with the laws of the Republic of South Africa, with its registered business address situated at Portion 32 Yellowood Road, Ruigtevle, Sedgefield, Western Cape, 6573.
3. The Second Defendant is **RAPTOR CAPITAL PROPRIETARY LIMITED**, a private company with registration number: 2024/285164/07, duly registered and incorporated in accordance with the laws of the Republic of South Africa, with its registered business address situated at 32 Yellowood Road, 32 Sedgefield, Western Cape, 6573.
4. The Third Defendant is **WESLEY GRANT HARRINGTON**, an adult male with identity number: 781209 5033 08 1 and a Director of the Second Defendant employed as such at 32 Yellowood Road, 32 Sedgefield, Western Cape, 6573.



### JURISDICTION

5. The above Honourable Court has jurisdiction in respect of this action as the First, Second and Third Defendants are situated within the area of jurisdiction of the above Honourable Court.

## JOINT LIABILITY

6. The Third Defendant has at all times been acting on his own behalf and on behalf of the First and Second Defendants. In this regard, during the period of July and August 2025 ("the relevant period") the Third Defendant continuously republished and reposted content on TikTok and other platforms under the alias "FSCA Monitor" and associated himself and the First to Second Defendants with the email address [fsca@behonest.co.za](mailto:fsca@behonest.co.za) and related addresses.
7. Accordingly, the Plaintiff will seek judgment against the Defendants, jointly and severally.



## DEFAMATION AND DAMAGES

8. During the relevant period numerous posts were published and reposted by the Third Defendant in the capacity as set out in paragraph 6 above, either in writing or by TikTok video in terms of which the following statements appear of and concerning the Plaintiff, namely that the Plaintiff *inter alia*:-
- 8.1. conducts its business dishonestly;
  - 8.2. is misleading the public;
  - 8.3. employs or permits unregulated, unqualified representatives;
  - 8.4. is guilty of criminal conduct;
  - 8.5. is guilty of contravening regulations;
  - 8.6. is not legally compliant;
  - 8.7. misrepresents its product offering;

8.8. employs unlawful methods; and

8.9. poses a risk to consumers.

(the “defamatory statements”)

A copy of the Tik Tok reposts and comments published on Tik Tok by the Third Defendant are attached hereto as “POC 1”, “POC 2”, “POC 3”, “POC 4”, “POC 5” “POC 6” and “POC 7”.

9. The defamatory statements are wrongful and defamatory of the Plaintiff, that it was intended and were in fact understood by the public as a matter of fact and not of opinion or belief, that the Plaintiff:-



9.1. is conducting business activities criminally;

9.2. is dishonest;

9.3. Is engaged in false advertising;

9.4. is not following legal rules;

9.5. employs or permits unregulated and unqualified representatives;

9.6. places members of the public at risk;

9.7. is operating without proper authority or approval;

9.8. is illegitimate;

9.9. is disreputable;

9.10. is a scammer; and

9.11. operates fraudulently.

10. The defamatory statements were and continue to be made with the intention of defaming the Plaintiff, distorting its business and injuring its good name and reputation.

11. As a consequence of the defamatory publications of and concerning the Plaintiff and the publication thereof to multiple users on the social media platform TikTok:-



11.1. the Plaintiff has been defamed;

11.2. the good name and reputation of the Plaintiff has been damaged;

11.3. the Plaintiff has been humiliated;

11.4. The dignity of the Plaintiff has been impaired; and

12. The Plaintiff has, in the circumstances referred to in paragraphs 11.1 to 11.4 above, suffered damages in the amount of R5 000 000-00 in respect of general damages for which the Defendant is liable to pay to the Plaintiff.

13. Notwithstanding demand, alternatively this summons constituting demand, the Defendant has failed to pay to the Plaintiff the aforesaid amount of R5 000 000-00.

**WHEREFORE** the Plaintiff prays for judgement against the Defendants jointly and severally, one paying the others to absolved as follows: -

14. Payment of the sum of R5 000 000-00;

15. Interest on the sum of R5 000 000-00 at the rate of 11.75% per annum a *tempore morae* to date of final payment;
16. Costs of suit on the attorney and client scale; and
17. Further and / or alternative relief.

DATED AT JOHANNESBURG ON THIS THE 26<sup>th</sup> DAY OF AUGUST 2025.



DAVID SAUL SWARTZ

(Attorney with the right of appearance in terms of Section 114(5) of the Legal Practice Act of 2014)

SWARTZ WEIL VAN DER MERWE  
GREENBERG INCORPORATED

*Attorneys for the Plaintiff*

3<sup>rd</sup> Floor, One-on-Ninth

Cnr Glenhove and Ninth Streets

Melrose Estate

**JOHANNESBURG**

Tel: 011 486 2850

Email: [david@swvginc.co.za](mailto:david@swvginc.co.za)

[kayla@swvginc.co.za](mailto:kayla@swvginc.co.za)

Ref: MR D SWARTZ/kb/MC0029

c/o ASSHETON-SMITH GINSBERG INCORPORATED

9<sup>TH</sup> Floor, Wale Street Chambers

38 Wale Street

CAPE TOWN

Tel: 012 424 7390

Fax: 012 424 0605

e-mail: [andrew@asg.law](mailto:andrew@asg.law)

(Ref:



## COURT ONLINE COVER PAGE

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Plaintiff / Applicant / Appellant

and

**RAPTORS INTERNATIONAL  
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CAPITAL PROPRIETARY  
LIMITED, WESLY GRANT HARRINGTON**

Defendant / Respondent

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### Annexure 01

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ELECTRONICALLY SIGNED  
BY:

**Registrar of The High Court,  
Western Cape Division, Cape  
Town**

"POC 1"

Subject: Your compliance officer 20 August Search

Dear Christodoulou & Mavrikis Inc.,

Thank you for your threatening letter on behalf of CompliShield. I have already forwarded your correspondence and "evidence bundle" to the relevant department at the FSCA for their review. They will be in the best position to determine the credibility of your client's licensing, conduct, and business practices.



FSCA-Monitor reposted

It is clear: there is nothing you can do to stop me from continuing to expose the truth. I will carry on publishing facts about unregulated conduct and questionable compliance practices. Your CompliShield Desperate attempt. So after exposing Complishields non compliance and reporting them to the FSCA, the little scoundrels attempted to silence me with their attorneys. Clearly they don't know my background and experience with South African court systems. Good luck following court rules in order to... more

Add comment...



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Plaintiff / Applicant / Appellant

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CAPITAL PROPRIETARY  
LIMITED, WESLY GRANT HARRINGTON**

Defendant / Respondent

---

### Annexure 02

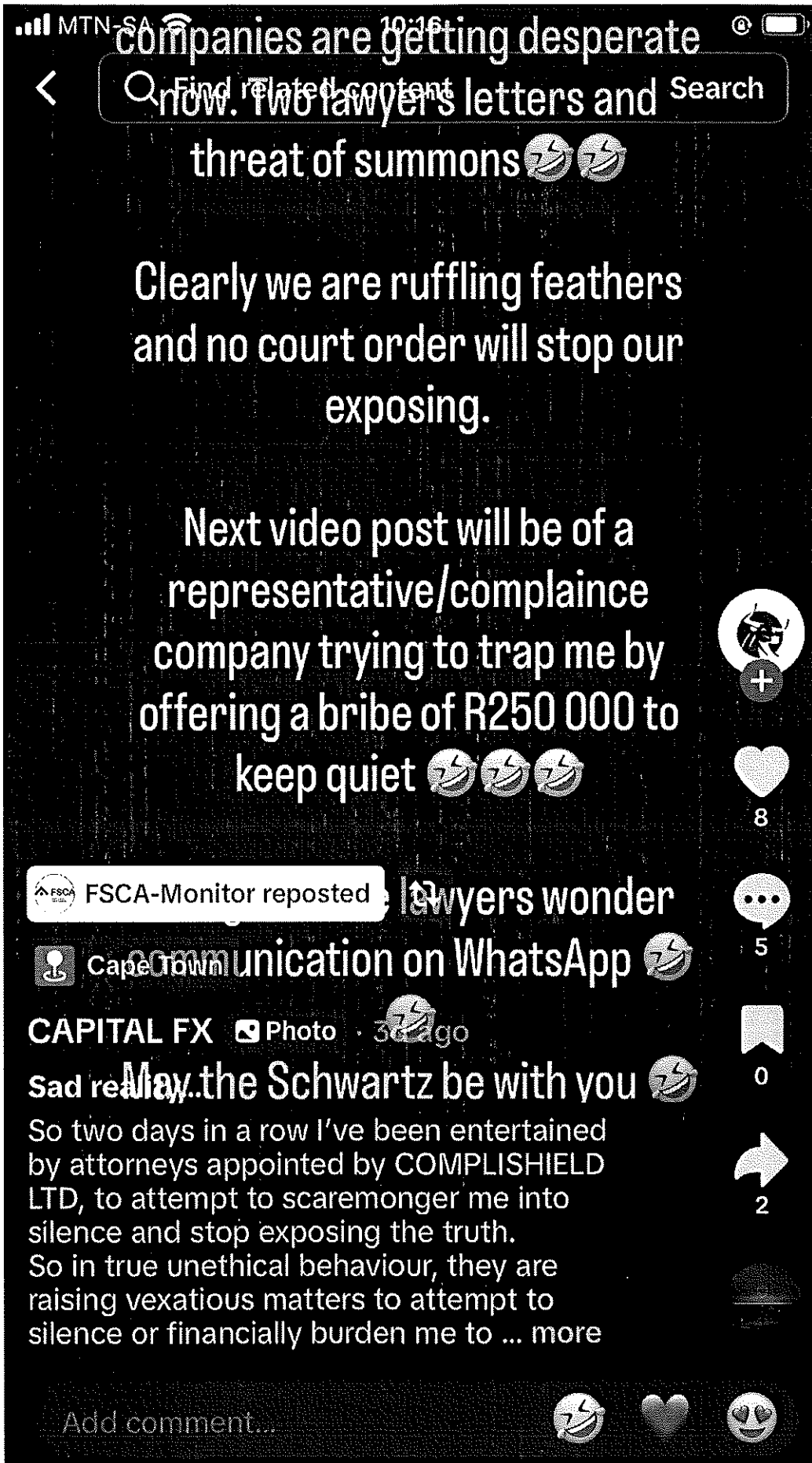
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Town**



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PROPRIETARY LIMITED, RAPTOR  
CAPITAL PROPRIETARY  
LIMITED, WESLY GRANT HARRINGTON**

Defendant / Respondent

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### Annexure 03

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Find related content

Search

**I'm going to show you what COMPLISHIELD are trying silence me with Cease and Disist letters from 2 separate law firms.**

**So as a gesture of goodwill, I contacted the Hawks, serious crime unit to request an investigation into Complishield and their representatives as a good citizen of the should do!!**

FSCA-Monitor reposted

Cape Town

**Enjoy the video**

CAPITAL FX · 3d ago

Financial Intelligence Centre clearly outlines the requirements required to operat... more

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5



4



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5



## COURT ONLINE COVER PAGE

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WESTERN CAPE DIVISION, CAPE TOWN

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Plaintiff / Applicant / Appellant

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**RAPTORS INTERNATIONAL  
PROPRIETARY LIMITED, RAPTOR  
CAPITAL PROPRIETARY  
LIMITED, WESLY GRANT HARRINGTON**

Defendant / Respondent

---

### Annexure 04

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BY:

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Western Cape Division, Cape  
Town**

"POC:4"



Photo



Reply Hide



wesley\_harrington78 10h

Finally if you actually look at the content on their page, there are clear disclaimers stating that they aren't the FSCA but a public voluntary service, monitoring social media platforms for unlicensed, unregulated "Fininfluencers" selling financial products to the public without proper oversight and regulation.



Reply Hide



wesley\_harrington78 10h

The page is not selling or promoting financial products or services to the public but offer information. So no scamming going on. Except your unethical conduct and behaviour.



Reply Hide

View 2 more replies



wesley\_harrington78 10h

It's amazing to see that you even misrepresent the truth and can't read simple English. There is no impersonation of the FSCA as the page doesn't advertise as it been the FSCA. It's a digital monitor that gathers information from social media to report to FSCA and the third party appointed by FSCA to manage whistleblower NGO Behonest.co.za. Stop trying to divert the attention from the fact you're not in compliance with the FSCA regulations regarding representatives according to the FAIS Act. Not a single rep has a KI appointed to supervise them and they are selling their own created products without any oversight or vetting done on those products that are been sold to the public.



Reply Hide



Add a comment...



## COURT ONLINE COVER PAGE

IN THE HIGH COURT OF SOUTH AFRICA  
WESTERN CAPE DIVISION, CAPE TOWN

CASE NO: **2025-147568**

In the matter between:

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Plaintiff / Applicant / Appellant

and

**RAPTORS INTERNATIONAL  
PROPRIETARY LIMITED, RAPTOR  
CAPITAL PROPRIETARY  
LIMITED, WESLY GRANT HARRINGTON**

Defendant / Respondent

---

### Annexure 05

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**NOTE:** This document was filed electronically by the Registrar on 26/8/2025 at 4:26:44 PM South African Standard Time (SAST). The time and date the document was filed by the party is presented on the header of each page of this document.



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BY:

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Town**



Photo



View 1 more reply



wesley\_harrington78 2m

🤔🤔🤔🤔 FSCA are aware of who we are and know we don't sell any products like you're falsely advertising. Secondly it's hilarious to read that you're worried for the public safety, yet you have unregulated representatives with no KI selling their own products without completing entry requirement, class of business, RE1 exam. Not a single product that is sold is part of Complishield product list. So who's contravening FAIS act and not following legal rules?? COMPLISHIELD



Reply Hide



wesley\_harrington78 9h

It is highly recommended that the public verify:

- that an entity or individual is authorised by the FSCA to provide financial products and services, including for giving recommendations about how to invest.
- what category of advice the person is registered to provide, as there are instances where companies or people are registered to provide basic advice for a low-risk product and then offer advice on far more complex and risky products.
- that the FSP number utilised by the entity or individual offering financial services matches to name of the FSP on the FSCA database



Reply Hide



wesley\_harrington78 9h

FSCA website: matches to name of the FSP on the FSCA database. This is directly from FSCA website. It urges the public to be diligent in their research into FSP providers.



Add a comment...



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PROPRIETARY LIMITED, RAPTOR  
CAPITAL PROPRIETARY  
LIMITED, WESLY GRANT HARRINGTON**

Defendant / Respondent

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### Annexure 06

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Photo



- ◆ Always verify before you trust.
- ◆ Only trust information from official FSCA channels.
- 📣 Stay vigilant. Scammers are getting smarter—but so are we.

#Complishield #fx #fxtrading #cfd #cfdtrading  
 #tradingsignals #copytrading #fsc #regulations  
 #onlinebrokerage #onlinetrading #southafrica

4 days ago

For you ▾



wesley\_harrington78 10h

Secondly all FSCA information is accessible by the public and the page is for the public and only relays already printed content directly from FSCA website. Get your facts straight before crying to daddy.



Reply Hide



mist.zy 4d

Beware!!



Reply Hide



complishield 4d · Author

@mist.zy ❤️



Reply

View 1 more reply



wesley\_harrington78 2m

🤔🤔🤔🤔 FSCA are aware of who we are and know we don't sell any products like you're falsely advertising. Secondly it's hilarious to read that



Add a comment...



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Plaintiff / Applicant / Appellant

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**RAPTORS INTERNATIONAL  
PROPRIETARY LIMITED, RAPTOR  
CAPITAL PROPRIETARY  
LIMITED, WESLY GRANT HARRINGTON**

Defendant / Respondent

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### Annexure 07

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Town**

"POCT"



Photo



registered to provide, as there are instances where companies or people are registered to provide basic advice for a low-risk product and then offer advice on far more complex and risky products.

• that the FSP number utilised by the entity or individual offering financial services matches to name of the FSP on the FSCA database

Reply Hide



wesley\_harrington78 9h

FSCA website: matches to name of the FSP on the FSCA database. This is directly from FSCA website. It urges the public to be diligent in their research into FSP providers.

Reply Hide



wesley\_harrington78 10h

Finally if you actually look at the content on their page, there are clear disclaimers stating that they aren't the FSCA but a public voluntary service, monitoring social media platforms for unlicensed, unregulated "Finiinfluencers" selling financial products to the public without proper oversight and regulation.

Reply Hide



wesley\_harrington78 10h

The page is not selling or promoting financial products or services to the public but offer information. So no scamming going on. Except your unethical conduct and behaviour.

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Plaintiff / Applicant / Appellant

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PROPRIETARY LIMITED, RAPTOR  
CAPITAL PROPRIETARY  
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Defendant / Respondent

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**Notice of Opposition to Mediation**

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Town**

**IN THE HIGH COURT OF SOUTH AFRICA  
(WESTERN CAPE DIVISION, CAPE TOWN)**

**CASE NO:**

In the matter between:

**COMPLISHIELD FINANCIAL GROUP PROPRIETARY  
LIMITED**

Plaintiff

and

**RAPTORS INTERNATIONAL PROPRIETARY LIMITED**

First Defendant

**RAPTOR CAPITAL PROPRIETARY LIMITED**

Second Defendant

**WESLEY GRANT HARRINGTON**

Third Defendant



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**RULE 41A NOTICE**

---

**BE PLEASED TO TAKE NOTICE** that the above-named Plaintiff objects to the referral of this matter to mediation.

**TAKE NOTICE FURTHER** that the Plaintiff does so on the basis that they do not believe mediation will resolve any of the issues between the parties.

DATED AT **CAPE TOWN** ON THIS THE **26<sup>th</sup>** DAY OF **AUGUST 2025**.

  
**SWARTZ WEIL VAN DER  
MERWE GREENBERG INC**

Plaintiff's Attorneys  
3rd Floor, One on Ninth  
Corner Glenhove & Ninth Streets,  
Melrose Estate  
Johannesburg  
Email: [david@swvginc.co.za](mailto:david@swvginc.co.za)  
Tel: 011 486 2850  
(Ref: D. SWARTZ)

c/o **ASSHETON-SMITH  
GINSBERG INCORPORATED**

9<sup>th</sup> Floor, Wale Street Chambers  
38 Wale Street  
CAPE TOWN  
Tel: (021) 424 7390  
Fax: (021) 424 0605



Email:  
[alexander@asg.law](mailto:alexander@asg.law); [andrew@asg.law](mailto:andrew@asg.law)  
(Ref: A. KLOSE)

**TO: THE REGISTRAR OF THE  
ABOVE HONOURABLE COURT  
CAPE TOWN**

**AND TO: RAPTORS INTERNATIONAL PROPRIETARY LIMITED**  
Portion 32  
Yellowwood Road  
Ruigtevle  
Sedgefield  
Western Cape  
6573

**AND TO: RAPTORS CAPITAL PROPRIETARY LIMITED**  
32 Yellowwood Road  
Sedgefield  
Western Cape  
6573

**AND TO: WESLEY GRANT HARRINTON**  
32 Yellowwood Road  
Sedgefield  
Western Cape  
6573