

**IN THE COURT OF APPEAL OF THE REPUBLIC  
OF SINGAPORE**

Criminal Motion No.      of 2012

In the Matter of Criminal Case No. 26 of 2008 -- Public  
Prosecutor-vs-Yong Vui Kong

And

In the matter of Criminal Appeal No. 13 of 2008 -- Yong  
Vui Kong --vs-Public Prosecutor

And

In the Matter of Article 9 and 12 of the Constitution of  
the Republic of Singapore

And

In the Matter of Supreme Court Judicature Act cap 322

And

**In the Matter of Yong Vui Kong  
(Fin No. G0623288X/Malaysian)**

*... Applicant*

v

**Public Prosecutor**

*... Respondent*

\*\*\*\*\*

**NOTICE OF MOTION**

.....  
M. Ravi  
Messrs L. F. Violet Netto  
101 Upper Cross Street  
#05-45 People's Park Centre  
Singapore 058357  
Tel: 6533-7433  
Fax: 6532-4301  
Ref: MR.6049.09

Dated this            day of January 2012

**IN THE COURT OF APPEAL OF THE REPUBLIC OF SINGAPORE**

Criminal Motion. of 2012

In the Matter of Criminal Case No. 26 of 2008 – Public Prosecutor-vs-Yong Vui  
Kong

And

In the matter of Criminal Appeal No. 13 of 2008 – Yong Vui Kong –vs-Public  
Prosecutor

And

In the matter of Yong Vui Kong v Public Prosecutor [2010] SGCA 20

And

In the Matter of Article 9 and 12 of the Constitution of the Republic of Singapore

And

In the Matter of Supreme Court Judicature Act cap 322

And

**In the Matter of Yong Vui Kong  
(Fin No. G0623288X/Malaysian)**

*... Applicant*

v

**Public Prosecutor**

*... Respondent*

**NOTICE OF MOTION**

The Humble Petition before the Justices of the **COURT OF APPEAL OF THE  
REPUBLIC OF SINGAPORE** and your humble Applicant moves a motion before the  
**HONOURABLE COURT** for the following orders that:

1. That the Court of Appeal re-opens its decision upholding the Applicant's conviction for a capital offence.
2. The selective prosecution between the Applicant and alleged syndicate mastermind Chia Choon Leng, who had the charges against him withdrawn and was detained under the Criminal Law (Temporary Provisions) Act, violates the Applicant's right to equal protection of the law under Article 12 of the Constitution.
3. The conviction should be quashed and the matter returned to the Attorney-General to consider whether or not to proceed against both actors for the same offence.
4. In the alternative the charge against the Applicant should be amended, the sentence of death should be set aside and replaced with a suitable non-capital sentence so that there is no difference in the treatment of offenders between Chia Choon Leng and the Applicant.

Dated this      day of January 2012

The grounds of this application are set out in the affidavits filed herein.

This Motion is filed on behalf of Yong Vui Kong, the Applicant, care of 101 Upper Cross Street #05-45 People's Park Centre Singapore 058357, Tel: 6533 7433 Fax: 6532 4301.



---

**Counsel for the Applicant**  
**M. Ravi**

The address for service of the abovenamed Applicant is care of Messrs L. F. Violet Netto,  
101 Upper Cross Street #05-45 People's Park Centre Singapore 058357.

To: The Defendants  
Attorney – Generals Chambers  
1 Coleman Street #10-00  
Singapore 179803  
Tel: 6336 1411  
Fax: 6339 0286