

**IN THE COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF
STATE ("THE COMMISSION")**

In the matter between:

**KWEZI BRIGITTE SHABALALA N.O.
(SECRETARY OF THE COMMISSION)**

APPLICANT

and

JACOB GEDLEYIHLEKISA ZUMA

RESPONDENT

FILING NOTICE

DOCUMENT: RESPONDENT'S ANSWERING AFFIDAVIT

SIGNED AND DATED at JOHANNESBURG on this day the 13 JANUARY 2020.

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M. Kane.

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Mhlanhlachi Kane
1 copy.

AND TO: HONOURABLE JUSTICE ZONDO

THE CHAIRPERSON OF THE COMMISSION OF INQUIRY

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INTRODUCTION

I, the undersigned,

JACOB GEDLEYIHLEKISA ZUMA

do hereby state as follows:-

1. I am an adult male and the former President of the Republic of South Africa. I reside at Nkandla, KwaZulu-Natal.
2. The facts herein contained are within my own personal knowledge and belief, and are both true and correct, save in so far as from the context the contrary appears. I attach hereto a confirmatory affidavit from my attorney, Mr Mantsha, in relation to those areas that concern him and the information he has conveyed to me.
3. Where I refer to the law and where I make submissions of a legal nature, I do so upon legal advice, which legal advice I accept and understand to be correct.
4. I am cited by the Commission as the respondent in this application for an order directing and authorising the Acting Secretary of the Commission to sign and issue summons against me.
5. The essence of the application to issue summons is to compel me on various grounds to appear and answer questions in relation to matters of apparent



interest to the Commission. The second order sought against me is a directive that the summons be made subject to such conditions or directives as the Chairperson may determine.

6. I have read the affidavit filed on behalf of the Commission to which I intend to give a comprehensive answer. Ordinarily, I should merely state that due to ill-health and the fact that I am due to travel abroad to receive medical attention, I will not be able to attend the hearing on the dates scheduled and imposed by the Commission for my attendance. Regrettably, the Commission's affidavit is replete with factual inaccuracies that I feel compelled to dispel.
7. Accordingly, the narrow purpose of this affidavit is to advise the Commission that I am due to continue with medical treatment in a foreign country until sometime in March 2020. To the extent that the Commission doubts my *bona fides* in this regard, I have asked my doctor to furnish, on a confidential basis, relevant proof to the Chairperson of the Commission. I have requested that such proof be given only to the Chairperson on a confidential basis because my medical condition is regarded and treated as a security issue and I also do not wish to waive my right to confidentiality relating to disclosure of my medical health.
8. The fact that I am unable to attend the scheduled hearing, even under the compulsion of summons, due to medical circumstances beyond my control should bring this application to an end. Under normal circumstances, I would leave the matters at that, but the affidavit of the Commission makes a plethora of insinuations and false accusations against me, which, if left unanswered,

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could create a completely wrong impression. I intend to address many of those allegations more fully when my comprehensive submissions and answers to the areas of interest are submitted to the Commission.

9. Although I will not answer each and every allegation contained in the Commission's affidavit, I emphasize that it is utterly false to contend or suggest that I have refused to cooperate with the Commission as alleged in its application. I view this inaccurate premise as a continuation of the unfortunate narrative that I am largely responsible for the numerous problems confronting our country. Insofar as I do not deal with allegations which are not a recordal of correspondence and directives, such allegations are denied.

CONDONATION FOR THE LATE FILING

10. The Commission's application was emailed on my attorneys of record on 19 December 2019. My attorneys' offices were closed since from the 13 to 06 Jan 2020. This was a time that most of the people and especially the professional and business world were still on holiday. Both my attorney and counsel were still on holiday outside the province of Gauteng. I attach hereto a copy of the letter from my attorney of record to the Commission stating that his offices were closed as at the date when the application was served. This is annexure "JGZ A".
11. Given the urgency of the situation, my legal team had to cut their holidays with their families short. I, too, had to do this affidavit at the same time when I was undergoing a medical surgery procedure which took place on 07 and 09 January 2020, and on top of the fact that I am continuing with medical treatment, I had

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attended to this affidavit under those conditions and to the dismay of my doctors who had instructed me to rest in order to speed up my recovery.

12. It is curious that the Commission's Legal Team and/or Secretary elected December holidays as the appropriate time to file this application. Unfortunately, this was a time when my attorneys had gone on holiday. I am advised that my attorney and counsel have had to cut short their holiday to attend to this application. I have insisted that we file this affidavit as it is clear to me that the Commission's legal team is hell-bent on spreading the narrative that I am refusing to cooperate. Nothing could be further from the truth.
13. Given my health issues and the timing of the application, I have requested my attorneys to assist me on an urgent basis to prepare this answer to the Commission's supporting affidavit and also represent me when the application is heard.
14. Those available in my legal team and I have had to work tirelessly on this matter from 6 January 2020. On 6 January 2020 my attorney communicated to the Commission that this affidavit would be delivered by 10 January 2020. However, closer to the time and the fact that I had to undergo a medical surgery procedure on 07 and 09 January 2020, and further given the accusations contained in the Commission's affidavit, it was important to answer the Commission more comprehensively than earlier envisaged. At that point my attorney communicated to the Commission that the affidavit could not be delivered on the 10th. In this regard, I attach the letter from my attorney as annexure "JGZB".

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15. The application by the Commission did not indicate the date on which I was to file the answering affidavit. It also did not explicitly state I could oppose the application. Be that as it may, when I indicated my opposition, the Commission did not object.
16. I respectfully seek leave from the Chairperson to file this answering affidavit so that I may place my version and contentions in relation to the application for compelling me to attend the hearing on the specified dates.
17. If I am late in filing this affidavit, I am late by one business day. I submit that this is not a significant time which cannot be condoned. I am advised that there is no prejudice to be suffered by the Commission as a result of this late filing.
18. I am of the view that when my affidavit is considered, it will be clear to the Chairperson that the Commission's Legal Team application is fundamentally flawed and falls to be dismissed. In fact, my medical situation is that I will be abroad during the period chosen by the Commission's legal team. Accordingly, the insistence by the Commission's legal team to proceed with this application is merely for show and to demonstrate that they are "not soft on Zuma". I have already appeared before the Commission regardless of my reservations. There is therefore no justification for the accusation that I am refusing or will refuse to cooperate. I am merely attending to a very serious medical condition, the proof of which I have already undertaken to make available to the Chairperson of the Commission.



19. I do not believe that any party would be prejudiced by the late-filing of this answering affidavit. It is necessary to put matters in context. Assuming the matter is as urgent as the Commissions contends, which I deny, then the Legal Team would be well prepared and capacitated for urgent proceedings.
20. I submit that my explanation for the delay is more than reasonable.
21. Further and lastly, I submit that it is in the interests of justice that my answering affidavit be filed so that the Chairperson and the Commission would have a better picture of my version in relation to this specific application.
22. I respectfully pray that the Chairperson grants condonation for filing this answering affidavit.
23. Before dealing specifically with the secretary's affidavit, I wish to set out my observations about how the Commission treats me. I do this simply because the Commission's legal team has deemed it appropriate in its affidavit to insinuate that I have been uncooperative, which accusation I dispute with the contempt it deserves. I will then set out my general answer to the summoning application. I will also set out the chronology which will demonstrate that I always intended and am willing to cooperate with the Commission.

MY OBSERVATIONS

24. The Commission's secretariat affidavit (for ease of reference I will refer to it as the Commission's affidavit or supporting affidavit) appears to be a desperate

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attempt to paint a picture that I am not cooperating with the Commission and/or that I am disrespecting the Chairperson of the Commission. The allegations contained therein are nothing but a continuation of the narrative that I have something to hide and that I am solely responsible for the maladies that confront South Africa. Further, they are just inappropriate and have no place in this process. Such allegations are not true and I take particular exception to them.

25. At the outset, I state that the application to compel me to answer questions and give evidence before the Commission is misconceived and a deeply concerning and egregious abuse of process. I have previously expressed my belief that the Commission's establishment was inconsistent with the Constitution and susceptible to review by an impartial and independent Court. I have not abandoned that belief.
26. I have raised my concern about the constitutionality of the Commission (its establishment in particular) during my appearance before the Commission, but I accept that I must respect the Commission as a legal process and cooperate with it. What I take exception to is to be bullied by the Commission's legal team even as I explain that I am facing health issues that are beyond my control.
27. I accept that the Commission ignores my concerns regarding the constitutional validity of the Commission. In any event, this particular application is not the platform to deal with this matter.
28. I have offered my cooperation to the Commission and exercised my rights under its rules. However, it appears that the Commission does not accept that where

5. [Signature]

I have not given a response to the Commission's notice, I have done so exercising my rights to ignore testimonies that I do not believe implicate me in any criminal wrong-doing.

29. It is utterly mischievous of the Commission's legal team to insinuate that when I exercise my right not to respond to a notice, I do so because I am refusing to cooperate. The rules themselves envisage that I should respond in the event that I wish to give evidence. If I elect not to respond, the Commission is at liberty to make the inferences it deems appropriate in its judgment.
30. It is self-evident that the Commission views me as an accused despite its insistence to the contrary. The affidavit by the Commission's Legal Team confirms this fact. I have testified before that I view this Commission as part of a political ploy which has no interest in truth but seeks a justification for a particular narrative and my public condemnation.
31. As regards allegations of "State Capture", I have given my responses which I urge the Commission to take notice of. The so-called State Capture notion invented by the former Public Protector is a political concept seeking to advance a factional narrative rather than to rid South Africa of the scourge of corruption. It is for that reason that I was called to answer to certain accusations and soon thereafter, the Commission went shopping for new so-called witnesses to imagine conversations they had had with the late Minister Collins Chabane. I am no sure about the fairness or legality of such an approach, but I have accepted that in the desire to scapegoat me, there are no legal limits.

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32. Once again, I reject with contempt the political notion that under my Presidency, I surrendered the State to interests that were inimical to our constitutional goals -in particular the Gupta family. I do not accept the political contention that the State under my Presidency operated outside the confines of the Constitution to advance unconstitutional goals. I have, as I do now, given my views on the political assessment that the State was captured. I simply do not agree, and I urge the Commission to accept that my views on State Capture answer the various opinions expressed by different individuals who have offered given their views to the Commission. The Commission and its witnesses are entitled to their views about me, but I am equally entitled to reject them.
33. Having given the Commission my views on State Capture, I do not accept that the Commission's attempt to invoke coercive powers to force me to answer questions on the personal views and subjective opinions of different Commission witnesses is done in good faith. It is a strategy that will, no doubt, create unjustified hostile and acrimonious conditions for my future participation in the Commission.
34. My election not to respond to certain notices and the Commission must be understood as participation in the Commission. The rules allow me the right to determine an appropriate response and where I have elected not to respond to a witness's views and opinions, I should not be condemned as failing to participate in the Commission. I contend that there is no lawful basis or good reason for the Commission for requiring me to answer feelings and speculative allegations and "advices" by individuals who are my political foes or who hold special personal or professional agendas of their own.



35. Some of the witnesses that I have been asked to respond to, are simply unhappy that they were removed from their positions for legitimate reasons or were dismissed from their jobs or redeployed to positions that they did not like. Naturally, these witnesses are bitter about those issues and should be regarded as having come to the Commission in order to vent. The removal of some of the witnesses from the positions they held in Government is no evidence that I was corrupt or sought to advance this manufactured political notion of "State Capture". No one should ever feel that they are too important to be moved from a position and if they are moved it amounts to corruption.
36. My view is that the Commission's evidence leaders have not been rigorous with many of its witnesses, particularly those whose testimony, true or not, coincides with the narrative that I enabled the so-called State Capture. They have not been rigorous in determining whether such allegations were intended to advance legitimate issues of concern to the Commission or a personal vendetta arising from deeply held political opinions on how government or state affairs were carried out. The "evidence" in most instances was simply accepted uncritically and not even tested against the objective principles on public administration.
37. The fact that the Commission would permit witnesses to change their testimonies without any consequences is evidence that the process itself has not met the acceptable standards of truth finding. The law firms that allegedly administered or assist such witnesses to change their testimonies it appears that they are also attorneys of the record for the Commission. This opens the Commission to the risk of having a report fraught with irregularities in future.

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38. While the Commission is within its rights to call any witness, including me, such a position must be purposeful and a legitimate pursuit for its truth-findings duties and not designed to embarrass or humiliate a witness. I have attended and will continue to attend voluntarily the inquiries of the Commission. I have not refused to come before the Commission when it was physically possible for me to do so.
39. The attempt to force me to participate in the Commission is not necessary because, based on objective evidence, I have and continue to co-operate with it. The fact that I face health challenges make it difficult for me to meet the Commission's agenda but is no way evidence that I am not cooperating with the Commission. Based on objective facts, the allegation of the Commission that they require summons to bring me to the Commission is entirely unfair and unfounded. It is unfortunate effect is that the Commission will, through these accusations arm my political opponents, with further political propaganda to tarnish my role when I was Head of State.
40. The Commission's strategy and timing to issue summons and the extensive media coverage of this application, appears to be designed to align with other related events elsewhere which are aimed at increasing the pressure to undermine and discredit me and my political and constitutional role in South Africa. The Commission should not allow itself to participate in the apparent coordination by my political enemies to abuse and deliberately undermine my constitutional rights.

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41. Issuing summons against me under these inaccurate facts and medical circumstances will no doubt give the impression that the Commission seeks to participate in the political and constitutional humiliation advanced by my political opponents who propagate the view that I presided over a corrupt state.

MY APPEARANCE AT THE COMMISSION

42. Between 15 July to 19 July 2019 I attended the seating of the Commission as per invitation. It was very clear that the Commission did not have any allegations of corruption or fraud to put to me. Instead, the evidence leader decided to embark on a fishing expedition by attempting to cross-examine me on matters relating alleged Cabinet memos, alleged discussion between myself and my Ministers relating to appointment of CEOs and board members of State Owned Companies.
43. Again, the questions that the Commission (per Mr. Pretorius) put to me were entirely irrelevant and betrayed a lack of understanding of the workings of public administration. The Commission also failed to appreciate the level of detail that a Head of State would be involved in as opposed to Directors-General of departments. I objected to the said abuse of the Commission process. When the matter was adjourned the Chairperson Stated the following:

"Thank you very much Mr Zuma, I wanted to mention earlier on and I just mention now that we may have taken – you might think we took quite some time before we came back but reaching agreement in principle didn't take longer than ten minutes after we started

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talking. There is a willingness to try and find solutions, the rest of the time what was left was to refine and make sure there was no misunderstanding. There was really no great difficulty in finding a solution once I met with both teams and counsel for the former President, came and indicated that the former President was opposed at all to us finding a way and it was clear to me that he would like a way to be found to move forward which, his remarks now, have confirmed. So once again thank you to both teams, thank you to the former President and thank you to everybody for the high level of discipline and thank you. We'll adjourn for the day and the former President will come back at another time that will be arranged. The Commission will adjourn for today but on Monday we'll continue, we'll start at o'clock to look at matters relating to Estina, thank you very much once again, we adjourn".¹

MY CIRCUMSTANCES FOLLOWING MY APPEARANCE AND TESTIMONY

44. Since my appearance before the Commission of Inquiry, I have been severely and publicly criticised by witnesses that have either appeared or are scheduled to appear or have appeared before the Commission. The public condemnation of my appearance and evidence has been severe. When this matter was brought before the Commission, it simply ignored the complaint, creating further unfavourable conditions for my giving evidence at the Commission. The litigation risk that attaches to my giving evidence before the Commission must

¹ Transcript Page 42 to 43, para 20, day 139, dated 19 July 2019.

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be addressed by the Commission because when I next appear before the Commission I wish to have the assurance that I enjoy its protection as a witness before it.

45. Since my testimony I now face threats of legal suits – from Mr Ngoako Ramatlhodi, General Sipiwe Nyanda and Derek Hanekom.
46. The fact that my appearance before the Commission of Inquiry has exposed me to litigation risks which significantly deplete my non-existent financial resources means that I cannot freely give evidence before the Commission of Inquiry in circumstances where I have no protection from urgent interdicts and damages from the Commission itself. This must be understood in the context of many other court battles that I face, as a result of which I face financial ruin. All of these require my attention and some of the dates for appearance are such that my legal team and I are severely prejudiced in terms of preparation.

INQUIRY ADJOURNS TO 22 JULY 2019

47. At the end of my first appearance, the Chairperson directed that my next appearance at the Commission would be per arrangement between myself and the Commission. I was surprised when the Chairperson sought to reinterpret his directive to mean that he would unilaterally set the dates for my next appearance. Accordingly, the basis upon which the Commission makes this application is unfounded.

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Proposed dates for my appearance at the Commission

48. When the Chairperson of the Commission adjourned the proceedings during the last day of my appearance, he directed that:

***"We'll adjourn for the day and the Former President will come back at another time that will be arranged."*²**

49. The Commission decided to undermine the directive of its Chairperson by trying to unilaterally impose dates for my next appearance. The Commission's unilateral decision to impose dates and terms of appearance made it difficult for me to attend. Nevertheless, on each and every occasion where dates were unilaterally imposed by the Commission, I timeously advised it of my position as set out below

Dates 14 to 25 October 2019

50. This was week during which I was attending my criminal case in the Pietermaritzburg High Court. My legal team had informed the Commission that I would not be available on the determined dates.

51. The Commission was duly advised by letter dated 17 September 2019 that;
"Our client is scheduled to appear in the criminal court in the Pietermaritzburg High Court during the week of 14 October 2019, and

² Page 43 of the transcript, day 139, dated 19 July 2019.

S. Thw

54. My legal team duly informed the Commission through a letter dated 01 November 2019, which states the following:

"We refer to the above matter and advise that former President was admitted in Hospital over the past weekend and was released late afternoon yesterday for him to continue treatment at his home.

The former President asked us to convey to you that due to the above he will not be able to attend the scheduled sitting of the Commission commencing on 11 November 2019 to 15 November 2019, he will however keep you updated on his recovery progress.⁵" A copy of the letter is attached as marked "JGZ E".

55. On 18 November 2019 I left the country to attend medical treatment abroad and returned on the 09 December 2019.

Dates from 21 to 25 November 2019

56. The Commission appeared to have been confused, according to its letter dated 27 September 2019, stating that:

⁵ Letter dated 01 November 2019, from L M Attorneys

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therefore the proposed dates of 14 to 25 October 2019 are not suitable to him.³ A copy is attached hereto as marked "JGZ C".

52. My legal team could not confirm those dates since I was waiting for the outcome of my application for the stay of my prosecution. That judgment was handed down on 13 October 2019. After the unfavourable outcome of my permanent stay application, I instructed my legal team to prepare an application for leave to appeal. This required me and my legal team to urgently work on the application for leave to appeal which was to be filed by 01 November 2019. It was impossible for the same legal team and myself to be both attending the Commission and preparing for the application for leave to appeal, that is why on 15 October 2019, my attorneys wrote a letter to the Commission stating that:

"... our client and his legal team are not available to attend the proposed sitting of the Commission in 15 October 2019."⁴

that time we were urgently preparing for leave to appeal. A copy of the said letter is attached a marked "JGZ D".

Dates from 11 to 14 November 2019

53. The reason for my unavailability is that I was ill, I was hospitalised in Durban prior to the proposed dates and was released to continue medical treatment at home.

³ Letter dated 17 September 2019, from L M Attorneys.

⁴ Letter dated 15 October 2019, from L M Attorneys

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“....You then say that the former President will appear before the Commission from 11 to 15 November 2019 but you say nothing about the week of 21 to 25 November 2019 which is the second of the three weeks set aside for the former President’s appearance before the Commission.”⁶

A copy of the letter is attached as marked “JGZ` F”.

57. On 01 October 2019, my legal team addressed a letter to the Commission dated 30 September 2019, stating that:

“....However, the Former President is still committed to attend the Commission’s proceedings during dates from 11 to 15 November 2019 as per your letter dated 13 September 2019. Your letter dated 13 September 2019 did not propose the dates of 21 to 15 November 2019, and therefore we could not have taken instructions in respect of the said dates.”⁷ A copy of the said letter is attached as marked “JGZ G”.

Proposed dates 27 to 30 January 2020

58. I am due to return to continue medical treatment as from 23 January 2020 for a much longer period. I have, during the course of this week and last week, also undergone another unscheduled medical procedure and therefore will not be able to attend the Commission on the said dates.

⁶ Letter dated 27 September 2019, from the Commission

⁷ Letter dated 30 September 2019, from L M Attorneys

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59. I now turn to deal with the legal basis of the Commission's Legal Team application and set out why it should be refused.

THE BASIS OF THE APPLICATION IS FLAWED

60. The fundamental basis of the application is that I have not cooperated with the Commission. This is false and is only perpetrated to fit the narrative that I must answer all allegations against me from the Commission's witnesses and the Commission notwithstanding my right(s) not to answer some allegations. Other than having exercised my rights in relation to allegations against me, I have so far cooperated with the Commission.
61. Since the Commission seems disinclined to believe me regarding my attendance at the Commission, I reiterate my undertaking that my doctor will furnish the Chairperson with a confidential note regarding my health issues and schedule for my medical treatment. I do so at the risk of breaching the security protocols regarding divulging such details. It is a travesty that I am now forced to discuss my medical condition in a public Commission of Inquiry in order to deal with an untruthful allegation that I am not willing to cooperate with it.

Application to authorize summons

62. I am advised and contend that the Commission's application is an abuse of process for a number of reasons.

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63. It is apparent from the application that I am being summonsed for three reasons set out in paragraph 55 of the Commission's affidavit. The first is to afford me a final opportunity to exercise my right to be heard and to hear my version in regards to matters raised in evidence concerning me and which implicate me. The second is to question me regarding those matters so as to assist the Commission in assessing the truthfulness of evidence, including his own evidence, placed before the Commission. The third is to generally conclude the work of the Commission comprehensively and efficiently and in accordance with a reliable and practicable timetable.
64. In my respectful view, all the three reasons have no merit.
65. The application is intended to portray me in a negative light and to continue to provide ammunition to those engaged in the character assassination plan that I detailed before the Commission. I should be forgiven for the view that the application – launched during the holidays – is intended to create a hostile political atmosphere and to use that hostility as part and parcel of the pressure that I currently endure from my detractors.
66. To attempt to use coercive powers of summons to force me to appear before the Commission even when my health does not permit it, is humiliating and deeply hurtful. Due to my medical condition for which I am scheduled to be hospitalized, I am unable to attend the Commission on the dates set down by the Commission. This is no disrespect to the Commission, but is due to circumstances beyond my control.

Handwritten signature and initials in the bottom right corner of the page.

67. It is deeply troubling that despite my assurance that I would appear before the Commission at a time and date convenient to all, the Commission has chosen to disbelieve my assurance by falsifying the facts relating to my cooperation with it.
68. The true facts are that I have cooperated with the Commission. I have appeared before the Commission (without any subpoena or summons), taken a position permissible under the rules on the notices, responded to the various inquiries from the Commission in relation to my next appearance. I have said to the Commission that I would appear before it and repeated that in various public platforms. It is surprising that the Commission should ignore these facts to portray me as someone not cooperating with the Commission. This conduct gives me the inescapable view that the Commission seeks to create conditions for my public lynching and condemnation which has been normalised in cases that involve me.
69. When I accepted the invite to appear before the Commission, I had done so in honour of the people who had elected me, and not that I agreed with manner in which the Commission was established and how it is going about its investigations and hearings. I reserve my rights to challenge the Commission's legality - in its establishment and in how it is conducted at the right time and before the right forum.
70. The basis of the application is so that I respond to unfounded and false allegations by the Commission's carefully selected witnesses. I say this for the following reasons.

J. H. G.

71. There is no objective guidance on how witnesses were selected to give evidence in support of the issues that the Commission is investigating. I have observed that the Commission has pursued its mandate in accordance with the following carefully managed strategy:

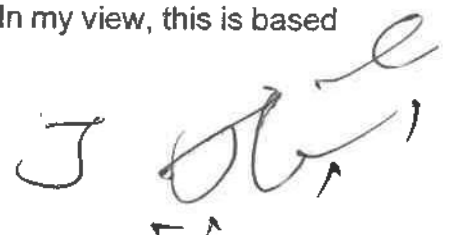
71.1. Carefully select witnesses who have publicly expressed their political or personal dislike or antipathy to me and that of my Presidency. The carefully selected witnesses were either ministers of my Cabinet (some of which are serving in the current administration) that I had removed from office. Others are members of Parliament who had ambitions to be appointed to ministerial positions but were not. The others are officials who were either dismissed or removed from serving in their positions for various reasons; or political opponents who live in open hostility to the agenda of the ANC and its successive governments. Interestingly, the Commission has not tested their involvement in the very transactions which they (the star witnesses) believe were problematic.

71.2. Set out the schedule of evidence in which these carefully selected witnesses would give evidence supporting the political view that I ran a corrupt and captured State;

71.3. Give these witnesses an opportunity to give their testimonies before the Commission on the basis of statements prepared with the knowledge or assistance of the Commission.



- 71.4. Thereafter, draft rule 3 notices to persons that the Commission refers to as Implicated Persons (of which I appear to the Principal or Chief Implicated Person) and require from them a response to allegations made by the Commission's chosen witnesses. These notices would include the right of the Implicated Person to say nothing about the testimony of the Commission's witnesses. The Implicated Person would be given the right to ask the Commission for an opportunity to cross-examine the witness;
- 71.5. Avoid and if unavoidable limit the testing of the "evidence" of the carefully selected witnesses.
72. It appears to me from objective facts that the Commission decided to first and foremost seek witnesses and "evidence" of "State Capture", corruption and fraud from persons that worked either as Ministers in my Cabinet or MPs during my tenor as President or officials in strategic institutions of government.
73. Consistent with the view that the Commission is conducting an investigation into my Presidency based on unjustified political assumption of State Capture, it appears to align itself with the view that the nine years of which I was President were wasted years in that they were characterised by constitutional chaos and corruption. It is not surprising that despite the fact that I was the head of State for the period that the Commission is investigating, I was not to be regarded as the witnesses of the Commission from which to seek the evidence necessary to make findings on State Capture, corruption and fraud. In my view, this is based



on the fact that I am an 'accused' before the Commission to answer allegations of State Capture, corruption and fraud.

74. My attitude, as the Commission will know, has been to request that the Commission gives me specific questions to answer. The Commission appears to dislike this eminently effective and reliable truth-finding device preferring to adopt an adversarial approach. As stated, I have given what I need to give on the political concept of State Capture. I have nothing to answer to in relation to fraud and corruption that the Commission has specifically given to me. If there are allegations that I was, during my years as President, involved in fraudulent and corrupt activities, they have not been given to me for my response. The Commission is simply engaged in an abuse of process to seek my attendance at the hearing to answer general questions relating to how government decisions were taken, by who, why and when.
75. The first and primary ground for this application must therefore fail because it is not factually correct that I refused to co-operate with the Commission. The application is an abuse of process by the Commission intended to fit the narrative of a popular but factually erroneous political perceptions that, as President, I was engaged in unconstitutional activities against the State.
76. The basis relied upon by the Commission that I have failed to cooperate with the Commission is further designed to perpetuate the political view that I am trying to avoid answering questions in relation to those areas of evidence that are said to implicate me. This suggestion is simply unfounded.

J. J. J.

77. However, the truth is that the Commission has consistently stated that it would not give me questions because to do so would subvert its alleged truth-finding mission of what really happened during my Presidency. That approach, as I have stated, has resulted in the Commission not being able to direct specific questions to me but general questions arising from general statements made by some witnesses.
78. I should not be compelled to answer questions raised by witnesses that do not implicate me in unlawful and unconstitutional activities. I do not wish to participate in the irrelevant theatre of entertainment. I am prepared to assist the Commission in its lawful work and to answer relevant issues.
79. As the Commission is aware, most witnesses that it chose are unhappy that they were dismissed or not listened to when they gave their views on certain matters. The Commission should not invoke its coercive powers to compel me to answer questions that do not implicate me in unconstitutional conduct. I am advised that that would be irrational for the Commission and/or the Chairperson.
80. It will be clear when the chronology of correspondences between myself and the Commission is presented that I engaged with the Commission, even appearing before it for several days. When I could not attend, I gave the Commission full reasons for my inability to attend. I stood ready to appear before the Commission in November 2019, but due to State of my health, I was unable to do so. That too was conveyed to the Commission.

J. J. J.

81. It is clear that the attitude of the Commission is based on a presumption that my circumstances are not relevant to how it has scheduled its programme. That presumption is wrong. It cannot be the true and lawful position of the Commission that I should appear before it even when I am unable to do so due to health-reason – unless the Commission believes I was and am faking my ailing health.
82. I have already undertaken to ask my doctor to furnish the Chairperson with the confidential note on my medical condition and schedule.
83. The fact that I have to breach security protocols to satisfy the Commission about my good faith displays the Commission's callous disregard for my dignity, equality, freedom and security of the person (as I am being treated inhumanely and in a degrading manner), privacy, the right to health care and not to be refused medical treatment. The essence and/or tone of the Commission's affidavit is that I am to be refused medical treatment.

Summons cannot be invoked to protect the right to be heard

84. In its ordinary reading, section 3 of the Commissions Act is not aimed at giving a witness the right to be heard as the Commission contends. The process is invoked for the "*purpose of ascertaining any matter relating to the subject of its investigations*". It is to "*summon witnesses, to cause an oath or affirmation to be administered to them, to examine them, and to call for the production of books, documents and objects.*"

J. J. J.

85. The contention that summons are necessary to give me a right to be heard is itself inimical to section 6 which creates the following offense under summons;

"6 Offences by witnesses

- (1) *Any person summoned to attend and give evidence or to produce any book, document or object before a commission who, without sufficient cause (the onus of proof whereof shall rest upon him) fails to attend at the time and place specified in the summons, or to remain in attendance until the conclusion of the enquiry, or until he is excused by the chairman of the commission from further attendance, or having attended refuses to be sworn or to make affirmation as a witness after he had been required by the chairman of the commission to do so or, having been sworn or having made affirmation, fails to answer fully and satisfactory any question lawfully put to him, or fails to produce any book, document or object in his possession or custody or under his control which he had been summoned to produce, shall be guilty of an offence and liable on conviction to a fine not exceeding fifty pounds or to imprisonment for a period not exceeding six months, or both such fine and imprisonment.*

- (2) ..."

86. I am advised and submit that issuing summons is not intended to give effect to the right of a witness to be heard. Summons place witness under compulsion to attend and answer questions. To attempt to read section 3(1) as a constitutionally compliant provision intended to give effect to the right of a witness to be heard is simply wrong and a self-serving attempt to create controversy around my attendance at the Commission. Summons are a coercive power – intended to force a reluctant witness to attend and give evidence before a commission of inquiry. To give it the constitutional gloss or legitimacy that the Commission does, is simply disingenuous.
87. In any event, I am advised that section 3(1) must be read together with the rights I have under the Constitution and in terms of Rule 3.3.6. I have a right to inherent dignity in terms of section 10 and to freedom and security under section 12 under the Constitution, which section 3(1) threatens. I have in terms of Rule 3 of the Commission Rules absolute discretion – ‘if I wish’ - to give evidence, to call witnesses to give evidence on my behalf or to cross-examine witnesses. That is a gross misunderstanding of the process of summons and its purpose to suggest that it is invoked to give effect to my right to be heard. I believe that the application on this basis should fail as a gross abuse of process.
88. In any event, to the extent that the Commission desperately wants to hear my version, it is not necessary to issue the summons. I am physically out of the country on the said dates and no amount of compulsion will alter my medical condition or location. Issuing summons under these circumstances will not nly be a futile exercise, but will violate my rights, including my right to a fair hearing. The is absolutely no purpose to be served by this application except to waste

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resources. The Commission can indeed wait until I am back in the country and when my health condition has improved. This act and show of force by the evidence leaders is entirely unnecessary, in my respectful view.

It is the Commission that has failed to give me questions

89. Advocate Pretorius SC was wholly unhappy when it was suggested to him during my appearance that he was engaged in cross-examining me on issues raised by witnesses that I had decided not to respond to. The right of the Commission to question me on any issues does not require summons. In correspondence with my lawyers, it was specifically requested that Advocate Pretorius SC send specific questions on which I should be required to answer. He specifically refused and the Chairperson to my recollection accepted his approach. I am surprised that the Commission now wishes to invoke the power of summons to ask me questions.
90. I cannot be given the right to decide whether to place a version or to cross-examine anyone and thereafter be forced to give answers to allegations made by those witnesses via cross-examination by the Commission. Advocate Pretorius SC flatly refused to give me specific questions for me to consider and answer on the ostensible basis that to do so would undermine the truth-finding mission of the Commission. That he now wishes to invoke the coercive powers of summons demonstrate his unique interests in perpetrating the political view held by the Commission witnesses that my Presidency was characterised by my corruption and fraudulent activities. I deny this and regard it as an insult.

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Ordinarily, I would ask for such insults to be struck of but it would serve no purpose before this Commission.

91. In any event, I will be sending the Commission my responses to the areas of interests sent to me. This was already prepared but could not be completed when I fell ill.

The summons are not to enable the Commission to conclude its work

92. It is not clear why summons against me are necessary for the Commission to conclude its work comprehensively and efficiently. If it is alleged that my testimony is holding the work of the Commission, I deny such an allegation.
93. The Commission has my evidence already, it could conclude its work without my further evidence and in my view, its conclusions would fit the narrative that there was "State Capture", fraud and corruption. The Commission is at liberty to make all the inferences that are consistent with its principal mission or that result from my election not to respond to certain notices.
94. As I have stated previously, I do not consider that the notices the Commission served on me implicate me in any criminal activities, corruption, fraud or violation of the Constitution and policy of the government. The Commission can take that to be my evidence and reject it if it decides that such evidence does not accord with the objective facts that it has.

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95. It appears to me that the Commission or someone had been "shopping" for as many people as possible that are willing to mention my name for whatever reason, and thus triggering the need for the Commission to issue adverse notices against me. I have informed the Commission that there is a concerted effort to scandalise my name and "...it is some of them who influenced this Commission to bury Zuma".⁸
96. This Commission, in essence, has been used as a platform by some to divert attention from the real issues and to use me as a scapegoat. By adopting these belligerent methods of summoning me, I believe that the Commission has fed to its brim the insatiable desire by some of its witnesses to scandalise my name to achieve long-held and deeply seated personal and political agendas. I do not believe that the Commission is a safe space to deal with those highly political issues and therefore contend that I have correctly exercised my rights in the manner that I have.

CHRONOLOGY OF NOTICES IN TERMS OF 3.3 OF THE COMMISSION

97. I have been served with Rule 3.3 notices in which it is alleged that certain witnesses have implicated me. Upon perusal and consideration of those notices, I could not see anywhere in all of those notices, where I am implicated in the violation of our criminal code, violation of any statute, Constitution and policy of Government.

⁸ Transcript Page 49, para 10, day 133, date 15 July 2019.

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98. On receipt of these notices and upon getting legal advice, I exercised my right under the Commission's own rules not to provide a statement or to ask for cross examination, the said notices were brought to my attention under the guise that I am implicated when in fact I am not. The Commission's view that I should answer every allegation made about me that does not implicate me in criminal wrong-doing is a clear indication that the Commission is not even-handed in its handling of issues involving me. The Commission should not expect me to answer every allegation made by witnesses which do not support a reasonable suspicion of criminal wrong-doing. The approach of the Commission, as set out in this application, appears to be inconsistent with its rules and elementary rules of fairness. If the approach is accepted as correct, it would reduce the Commission to a platform designed to humiliate and persecute people by demanding them to answer frivolous allegations which have nothing to do with the commission of fraud and corruption.
99. Consistent with my reading of the Commission's Rules, I have participated in the Commission by exercising the option not to give any responses to statements that do not implicate me in criminal wrong-doing and not to apply to cross-examine any Commission witnesses who have mentioned my name.
100. The Commission should not expect that I should answer all the allegations made against me by its witnesses simply because they mentioned my name in those statements. I have yet to come across a witness who has accused me of corruption and fraud and when I do, I consider it then and deal with it in a manner I deem fit in line with my legal rights.

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101. In short, as President of the Republic of South Africa, I was sworn to uphold the Constitution and to protect the State. I believe that I did so. The fact that someone else does not believe so should not give the Commission a right to compel me to respond to that witness. I fundamentally disagree that the State was captured and if so with my assistance. The fact that someone else believes so, should not be a basis that I am compelled to respond to a different viewpoint.
102. In any event, I was sworn to secrecy, the nature of which I could not likely disclose the discussions and decisions made by my cabinet in pursuant of the interests of the country. I will not, for example, give any credibility to allegations made by former members of our intelligence community – who too where sworn to uphold secrecy of government affairs for reasons well known to them. The idea that I should give an answer as to why I did not accept certain intelligence information or did not act in a manner that I was advised by the intelligence community is not something I should be forced to testify on.
103. I am content to accept that members of our intelligence community had strong views about certain issues on which they gave advice. What I strongly deny is that I should be compelled to answer allegations and observations made by the intelligence community in this Commission simply because they mention my name.
104. The aforesaid does not amount to not cooperating with the Commission. When I exercise my right to remain silent in the face of allegations made by witnesses, I appreciate the risks that the Commission will make whatever it wishes to make of the evidence.

Handwritten signature and initials in black ink, located at the bottom right of the page. The signature appears to be 'J. M. Z.' followed by a flourish.

105. The Commission should also be aware of the constitutional principle of deference which even the Constitutional Court recognises. The Commission should not, like its witnesses, seek to second-guess and view with suspicion all the decisions which I was constitutionally entitled to make.

CORRESPONDENCE BETWEEN MYSELF AND THE COMMISSION

106. I have decided to set out the extent of the correspondences between my attorney (on my behalf) and the Commission in order to dispel a deceit that I am not cooperating with the Commission. I urge the Commission to examine carefully the facts as they are and not be diverted into agendas designed to abuse, humiliate and persecute me. Unfortunately, I am convinced that this approach to issue summons under the guise that it will advance my rights is a ruse aimed at perpetrating the false notion that I am guilty of the crime of "State Capture".
107. I have stated before that the Commission should not be weaponised to give potency to political narratives that there was a capture of the State. A dispassionate examination of the correspondence below will dispel the notion that summons are necessary because I am not cooperating.

No.	Description	Pages
1.	Letter from Mabunda Attorneys to Lugisani Mantsha Attorneys, dated 1 August 2018,	1-2

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	<p>RE: MS MABEL PATRONELLA MENTOR / MR JACOB GEDLEYIHLEKISA ZUMA</p> <p>Letter confirming service by email.</p>	
2.	<p>Email from S'fiso Molongoana to Lugisani Mantsha Attorneys, dated 2 August 2018,</p> <p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MENTORS NOTICE IN TERMS OF RULE 3.3 OF THE COMMISSION</p> <p>Email enclosing Ms Mentor's Notice in terms of Rule 3.3 of the Commission</p>	3
3.	<p>Email from S'fiso Molongoana to Lugisani Mantsha Attorneys, dated 2 August 2018</p> <p>RE: JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MASEKO'S NOTICE IN TERMS OF RULE 3.3 OF THE COMMISSION</p>	4

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	Email enclosing Mr Maseko's Notice in terms of Rule 3.3 of the Commission	
4.	<p>Email from Lugisani Mantsha Attorneys to S'fiso Molongoana, dated 2 August 2018, acknowledging receipt</p> <p>RE: JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MASEKO'S NOTICE IN TERMS OF RULE 3.3 OF THE COMMISSION</p>	5
5.	<p>Email from S'fiso Molongoana to Lugisani Mantsha Attorneys, dated 3 August 2018</p> <p>RE: MR THEMBA MVELI JAMES MASEKO / MR JACOB GEDLEYIHLEKISA ZUMA</p> <p>Letter requesting to acknowledge receipt of the notices.</p>	6
6.	<p>Letter from Lugisani Mantsha Attorneys to Mabunda Incorporated, dated 7 August 2018</p> <p>RE: MS MABEL PATRONELLA NOTICE IN TERMS OF RULE 3.3 OF THE COMMISSION</p>	7

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	Letter requesting to acknowledge receipt of the notices.	
7.	<p>Letter from Lugisani Mantsha Attorneys to Mabunda Incorporated, dated 7 August 2018,</p> <p>RE: MS MABEL PATRONELLA MENTOR, MR THEMBA MVELI JAMES MASEKO, NOTICE IN TERMS OF RULE 3.3 OF THE COMMISSION</p> <p>Letter Acknowledging receipt of the notices.</p>	8-9
8.	<p>Email from S'fiso Molongoana to Lugisani Mantsha Attorneys, dated 7 August 2019,</p> <p>RE: MS MABEL PATRONELLA MENTOR, MR THEMBA MVELI JAMES MASEKO, NOTICE IN TERMS OF RULE 3.3 OF THE COMMISSION</p> <p>Letter acknowledging receipt</p>	10
9.	<p>Letter from Lugisani Mantsha Attorneys to Mabunda Incorporated, dated 16 August 2018</p> <p>RE: NOTICE IN TERMS OF RULE 3.3 – MS MABEL PETRONELLA MENTOR</p>	11-17

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	Letter advising the Commission we are in the process of advising our client on allegations set out in Mentor's evidence.	
10.	Letter from Lugisani Mantsha Attorneys to Mabunda Incorporated, dated 16 August 2018 RE: NOTICE IN TERMS OF RULE 3.3 – MR MASEKO Our letter stating that is not clear to us in what way, manner and substance the alleged Statement or affidavit of Ms Mentor contains evidence that "implicates" our client.	18 -23
11.	Letter from Mabunda Incorporated to Lugisani Mantsha Attorneys, dated 16 August 2018 IN THE JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MENTORS NOTICE IN TERMS OF RULE 3.3 OF THE COMMISSION Letter acknowledging receipt.	24
12.	Letter from Mabunda Incorporated to Lugisani Mantsha Attorneys, dated 15 August 2018	25-26

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	<p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MS VYTJIE MENTOR</p> <p>Letter acknowledging receipt.</p>	
13.	<p>Letter from Mabunda Incorporated to Lugisani Mantsha Attorneys, dated 17 August 2018</p> <p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MS VYTJIE MENTOR</p> <p>Response to our letter dated 15 August 2018, stating that our client can challenge Mentor's Statement, and furthermore our client can make an application to the Chairperson of the Commission to cross examine Ms Mentor on such matter.</p>	27-28
14.	<p>Letter from Mabunda Incorporated to Lugisani Mantsha Attorneys, dated 17 August 2018</p> <p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND</p>	29-30

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	<p>FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MS PHUMLA WILLIAMS NOTICE IN TERMS OF RULE 3.3 OF THE COMMISSION</p> <p>Letter enclosing Phumla William's Notice in terms of Rule 3.3 of the Commission.</p>	
15.	<p>Letter from Mabunda Incorporated to Lugisani Mantsha Attorneys, dated 17 August 2018</p> <p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MR MASEKO'S ALLEGATION</p> <p>Response to our letter dated 15 August 2018, stating that our client can challenge mentor's Statement, and furthermore our client can make an application to the Chairperson of the Commission to cross examine Mr Maseko on such matter.</p>	31-33
16.	<p>Letter from Mabunda Incorporated to Lugisani Mantsha Attorneys, dated 21 August 2018</p> <p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND</p>	34-37

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	<p>FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MR JACOB ZUMA</p> <p>Letter forwarding further correspondence relating to the issues raised.</p>	
17.	<p>Letter from Mabunda Incorporated to Lugisani Mantsha Attorneys, dated 21 August 2018</p> <p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MR JACOB ZUMA</p> <p>Letter enclosing Mr Mseko's bundle of documents.</p>	38
18.	<p>Letter from Lugisani Mantsha Attorneys to Mabunda Incorporated, dated 22 August 2018</p> <p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MR JACOB ZUMA</p> <p>Email acknowledging receipt</p>	39

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19.	<p>Letter from Mabunda Incorporated to Lugisani Mantsha Attorneys, dated 22 August 2018 (documents)</p> <p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MR JACOB ZUMA</p> <p>Email to download documents.</p>	40
20.	<p>Email from Lugisani Mantsha Attorneys to Mabunda Incorporated, dated 22 August 2018, acknowledge receipt of a letter</p> <p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MS BARBARA HOGAN/ MR JACOB ZUMA</p> <p>Letter enclosing Ms Barbara Hogan Notice in terms of Rule 3.3 if the Commission.</p>	41
21.	<p>Letter from Lugisani Mantsha Attorneys to Mabunda Incorporated, dated 24 August 2018</p>	42-44

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	<p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MS BARBARA HOGAN/ MR JACOB ZUMA</p> <p>Reply to a letter dated 21 August 2018, stating that we have considered the transcript of the recorded testimony of Ms mentor before the Public Protector as provided by their office. And we have also noted the bundle of Ms Mentor that the Commission had corresponded with a Government Department.</p>	
22.	<p>Letter from Mabunda Incorporated to Lugisani Mantsha Attorneys dated 26 August 2018,</p> <p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE:MS BARBARA HOGAN/ MR JACOB ZUMA</p> <p>Email acknowledging receipt of our letter dated 24 August 2018.</p>	45
23.	<p>Email from Lugisani Mantsha Attorneys to Mabunda Incorporated, dated 26 August 2018, acknowledging receipt.</p>	46-48

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	<p>RE: IN THE JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE:MS BARBARA HOGAN/ MR JACOB ZUMA</p> <p>Letter stating that we enquired from evidence leaders or legal advisors of the Commission as to whether the Statement of Mentor, Mr Maseko and Ms Williams conStated the totality of the notices in terms of rule 3.3 of our client.</p> <p>The answer from the evidence leaders was, "yes the Statements of the three were all the Statements due to our client in respect of what we termed phase one even though it was indicated that we still receive further Statements in respect of what they termed phase two".</p>	
24.	<p>Email from Mabunda Incorporated to Lugisani Mantsha Attorneys, dated 26 August 2018acknowledging receipt,</p> <p>RE: IN THE JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE:MS BARBARA HOGAN/ MR JACOB ZUMA</p> <p>Email acknowledging receipt of our letter dated 24 August 2018.</p>	49

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25.	<p>Email from Mabunda Incorporated to Lugisani Mantsha Attorneys, dated 27 August 2018</p> <p>RE: MS MENTOR</p> <p>Email informing us that the Commission will be dealing with the issue of how to take the process forward in respect of those parties to the proceedings who have not yet filed their Rule 3.4 notices amongst others.</p>	50
26.	<p>Letter from Lugisani Mantsha Attorneys to Mabunda Incorporated, dated 31 August 2018</p> <p>RE: IN THE JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE:MS BARBARA HOGAN/ MR JACOB ZUMA</p> <p>Letter regarding Mr Maseko, Ms Mentor and Ms Williams notices and Statements, and that our client have considered the said Statements in order to determine whether they implicate our client.</p> <p>Furthermore, informing the Commission that nothing in the aforementioned witnesses' Statements implicates or may</p>	51-54

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	implicate our client in the infringement of the aforementioned statuses, policies of government and relevant ethical codes.	
27.	<p>Letter from Mabunda Incorporated to Lugisani Mantsha Attorneys, dated 09 September 2018</p> <p>RE: IN THE JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MS BARBARA HOGAN</p> <p>Letter regarding Ms. B Hogan, confirming that the Evidence Leaders of the Commission will be leading Ms. B Hogan.</p>	55-57
28.	<p>Letter from the Commission to Lugisani Mantsha Attorneys, dated 12 September 2018</p> <p>RE: THE STATE CAPTURE COMMISSION OF INQUIRY</p> <p>Letter in respect of the Commission reconvening on 13 September, at 10h00. Furthermore, inviting us to attend the proceedings, in order to take note of the announcement.</p>	58-59

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29.	<p>Letter from Mabunda Incorporated to Lugisani Mantsha Attorneys, dated 08 October 2018</p> <p>RE: NOTICE IN TERMS OF RULE 3.3, MS BARBARA HOGAN</p> <p>Letter regarding Ms. B Hogan and Mabunda Inc. advising us that Ms will be appearing before the Commission on 10 October 2018.</p>	60-61
30.	<p>Letter from Lugisani Mantsha Attorneys to Mabunda Incorporated to dated 09 October 2018</p> <p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MS BARBARA HOGAN</p> <p>Letter requesting confirmation of the time which Ms. B Hogan will give evidence.</p>	62-63
31.	<p>Email from Mabunda Incorporated to Lugisani Mantsha Attorneys, dated 09 October 2018, Acknowledgement of receipt</p> <p>RE: NOTICE IN TERMS OF RULE 3.3. BY MS BARBARA HOGAN</p>	64

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	Email advising us that Ms B. Hogan will give evidence at 10h00.	
32.	Letter from Lugisani Mantsha Attorneys to Mabunda Incorporated to dated 11 October 2018 RE: INVITATION TO THE FORMER PRESIDENT J.G ZUMA Letter advising the Secretary of the Commission that our client that our client is attending to the matter and has requested the Presidency to be provided with the records, in order to assist the Commission.	65-66
33.	Letter from Lugisani Mantsha Attorneys to Mabunda Incorporated to dated 12 October 2018 RE: MS B HOGAN NEW STATEMENT OF EVIDENCE Letter requesting the Commission to provide us with Ms B Hogan's new Statement, due to complaints raised on behalf of our client during the Commission of Inquiry sitting.	67-68
34.	Letter from Mabunda Incorporated to Lugisani Mantsha Attorneys, dated 12 October 2018	69-70

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	<p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MS BARBARA HOGAN/MR GEDLEYIHLEKISA ZUMA</p> <p>NOTICE IN TERMS OF RULE 3.3 OF THE COMMISSION</p> <p>Receipt of Ms. B. Hogan's Notice in terms of Rule 3.3 and Statement.</p>	
35.	<p>Letter from Mabunda Incorporated to Lugisani Mantsha Attorneys, dated 23 October 2018</p> <p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MR PRAVIN GORDHAN / MR DANIEL MANTSHA</p> <p>Receipt of Notice in terms of Rule 3.3 and Statement of Mr. P. Gordhan.</p>	71-72
36.	<p>Letter from Lugisani Mantsha Attorneys to Mabunda Incorporated, dated 9 November 2018</p> <p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND</p>	73-74

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	<p>FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MR PRAVIN GORDHAN</p> <p>Letter requesting extension until 29 November 2018, in respect of our client making elections in terms of the Commission rules.</p>	
37.	<p>Letter from Mabunda Incorporated to Lugisani Mantsha Attorneys to, dated 9 November 2018</p> <p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MR NHLANHLA NENE</p> <p>Acknowledgement of our letter dated 09 November 2018, further advising us that Mabunda Attorneys will revert back to us, once they've received instructions</p>	75-76
38.	<p>Letter from Lugisani Mantsha Attorneys to Mabunda Inc, dated 9 November 2018</p> <p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MR NHLANHLA NENE</p>	77-79

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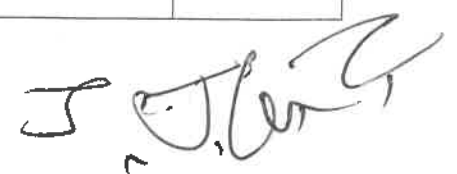
	<p>Letter to the Secretary of the Commission;</p> <p>Informing the commission that we are considering their application for condonation.</p> <p>Requesting Commission to provide us with the date of the initial contract requesting to attend Commission, either by Nene, himself or the Commission.</p> <p>Advising that our client will only be able to make his elections on the Commission's application o or before 29 November 2019.</p>	
39.	<p>Letter from Mabunda Incorporated to Lugisani Mantsha Attorneys, dated 11 November 2018</p> <p>RE: IN THE JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MS BARBARA HOGAN / MR JACOB ZUMA</p> <p>Receipt of link containing Ms. Hogan's evidence</p>	80
40.	<p>Letter from Mabunda Incorporated to Lugisani Mantsha Attorneys, dated 14 November 2018</p>	81-82

5 JGK

	<p>RE: JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: APPLICATION FOR POSTPONEMENT (MR NENE)</p> <p>Letter regarding our client's notice of application, confirming that the application will be heard on 15 November 2018. Further indicating that our client had not Stated his intention to oppose.</p>	
41.	<p>Letter from Mabunda Incorporated to Lugisani Mantsha Attorneys, dated 14 November 2018</p> <p>RE: JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: APPLICATION FOR POSTPONEMENT (MR NENE)</p> <p>Receipt of Nene's application for postponement.</p>	83-84
42.	<p>Letter from Mabunda Incorporated to Lugisani Mantsha Attorneys, dated 15 November 2018</p> <p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF</p>	85-86

J. J. J.

	<p>STATE: APPLICATION FOR CONDONATION BY THE LEGAL TEAMT (MR NENE)</p> <p>Advising us that Mr. Nene's application has been granted, and that they will advise us on the date of appearance, duly.</p>	
43.	<p>Letter from Lugisani Mantsha Attorneys to Mabunda Incorporated, dated 15 November 2018</p> <p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: APPLICATION FOR CONDONATION BY THE LEGAL TEAM (MR NENE)</p> <p>Letter advising Mabunda Inc that we cannot consider the application.</p>	87-88
44.	<p>Letter from Lugisani Mantsha Attorneys to Mabunda Incorporated, dated 15 November 2018</p> <p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: APPLICATION FOR POSTPONEMENT (MR NENE)</p>	89



	Letter advising that we have no objection to application for postponement.	
45.	<p>Letter from Mabunda Incorporated to Lugisani Mantsha Attorneys, dated 21 November 2018</p> <p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: ADVOCATE SAM MUOFHE, NOTICE IN TERMS OF RULE 3.3 OF THE COMMISSION</p> <p>Receipt of Mr Moufhe's Notice in terms of Rule 3.3</p>	90-91
46.	<p>Letter from Mabunda Incorporated to Lugisani Mantsha Attorneys, dated 22 November 2018</p> <p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: GENERAL SIMPHIWE NYANDA, NOTICE IN TERMS OF RULE 3.3 OF THE COMMISSION</p> <p>Receipt of Mr Nyanda's Notice in terms of Rule 3.3</p>	92-94

J. A. J.

47.	<p>Letter from Mabunda Incorporated to Lugisani Mantsha Attorneys, dated 22 November 2018</p> <p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: ADVOCATE NGOAKO RAMATHLODI, NOTICE IN TERMS OF RULE 3.3 OF THE COMMISSION</p> <p>Receipt of Mr Ramathodi's Notice in terms of Rule 3.3 of the Commission</p>	95-96
48.	<p>Letter from Lugisani Mantsha Attorneys to Mabunda Incorporated, dated 28 November 2018</p> <p>RE: INVITATION TO THE FORMER PRESIDENT J.G ZUMA</p> <p>Letter advising that we still waiting for our client's documents.</p>	97-98
49.	<p>Letter from Lugisani Mantsha Attorneys to Mabunda Incorporated, dated 28 November 2018</p> <p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND</p>	99-100

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	<p>FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: ADVOCATE NGOAKO RAMATHLODI</p> <p>Acknowledging receipt of the notice.</p>	
50.	<p>Letter from Lugisani Mantsha Attorneys to Mabunda Incorporated, dated 28 November 2018</p> <p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MR NHLANHLA NENE.</p> <p>Letter advising that our client is unable at this stage to response to notice in terms of Rule 3.3 as indicated in our letter of the 09 November 2019.</p>	101-102
51.	<p>Letter from Lugisani Mantsha Attorneys to Mabunda Incorporated, dated 28 November 2018</p> <p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MR PRAVIN GORDHAN</p>	103-104

5 J. K. Z.

	Letter advising that our client is unable at this stage to response to notice in terms of Rule 3.3 as indicated in our letter of the 09 November 2019.	
52.	<p>Letter from Mabunda Incorporated to Lugisani Mantsha Attorneys, dated 06 December 2018</p> <p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: GENERAL SIPHIWE NYANDA/MR JACOB ZUMA</p> <p>Letter postponing Mr Nyanda's date of giving evidence.</p>	105-106
53.	<p>Letter from Mabunda Incorporated to Lugisani Mantsha Attorneys, dated 10 December 2018</p> <p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: GENERAL SIPHIWE NYANDA</p> <p>Letter confirming that Mr Nyanda's evidence is scheduled on the 06 Feb 2019</p>	107-108

J. J. G. L.

54.	<p>Letter from Mabunda Incorporated to Lugisani Mantsha Attorneys, dated 30 January 2019</p> <p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: ANGELO AGRIZZI / MR JACOB ZUMA, NOTICE IN TERMS OF RULE 3.3 OF THE COMMISSION</p> <p>Receipt of Mr Agrizzi's Notice in terms of Rule 3.3 of the Commission</p>	109-110
55.	<p>Letter from Lugisani Mantsha Attorneys to Mabunda Incorporated, dated 7 February 2019</p> <p>RE: IN THE JUDICAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: ANGELO AGRIZZI/MR JACOB ZUMA</p> <p>Acknowledging receipt of the notice, and reiterate that our client to this very day, has always cooperated with the Commission.</p>	111-113

J. Steyn

56.	<p>Email from the Commission to Lugisani Mantsha Attorneys dated 7 February 2019, acknowledging of receipt</p> <p>RE: IN THE JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: ANGELO AGRIZZI/MR JACOB ZUMA</p> <p>Acknowledging receipt.</p>	114
57.	<p>Letter from Mabunda Incorporated to Lugisani Mantsha Attorneys, dated 6 March 2019,</p> <p>RE: IN THE JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE</p> <p>Letter informing us to refer all further correspondences and communication to the Secretary of the Commission.</p>	115-117
58.	<p>Letter from Lugisani Mantsha Attorneys to Mabunda Incorporated, dated 7 March 2019, acknowledging of receipt</p> <p>RE: IN THE JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND</p>	118

J. J. J.

	<p>FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MR JACOB ZUMA</p> <p>Letter acknowledging receipt.</p>	
59.	<p>Letter from Lugisani Mantsha Attorneys to Mabunda Incorporated, dated 26 April 2019, acknowledging of receipt</p> <p>RE: ALLEGATION FAILING BY THE FORMER PRESIDENT, MR. JG ZUMA TO DELIVER AN AFFIDAVIT REQUESTED BY THE CHAIRPERSON</p> <p>Letter informing that we have requested our client's documents from Presidency in order to provide the response. And we reject strongly any suggestion that our client is not co-operating with the Commission.</p>	119-122
60.	<p>Letter from the Commission to Lugisani Mantsha Attorneys, dated 26 April 2019</p> <p>RE: FAILURE BY THE FORMER PRESIDENT, MR. JG ZUMA TO DELIVER AN AFFIDAVIT REQUESTED BY THE CHAIRPERSON</p> <p>In regard to our client's delivery of an affidavit, the Commission notes with deep concern that it is now more than seven (7)</p>	123-124

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	months since the Chairperson made the request and over six months since we wrote a letter, and our client has not complied with the Chairperson's request and has not informed the Chairperson if he has any difficulties in complying with the request.	
61.	<p>Letter from the Commission to Lugisani Mantsha Attorneys, dated 30 April 2019, acknowledging of receipt</p> <p>RE: APPEARANCE OF FORMER PRESDEINT MR. J.G. ZUMA BEFORE THE COMMISSION</p> <p>Letter advising that our client appearance before the commission in order to</p> <p>Give his side of the story regarding evidence given by witnesses</p> <p>To answer questions that the Commission may wish to ask him regarding the Commission of Inquiry</p>	125
62.	<p>Letter from the Commission to Lugisani Mantsha Attorneys, dated 6 May 2019</p> <p>RE: APPEARANCE OF FORMER PRESDEINT MR. J.G. ZUMA BEFORE THE COMMISSION: LIST OF WITNESSES</p>	126-127

J. J. L.

	Letter containing the list of witness's evidence which our client will be asked questions on, marked "Annexure A"	
63.	Letter from Lugisani Mantsha Attorneys to Mabunda Incorporated, dated 09 May 2019 RE: APPEARANCE OF FORMER PRESDEINT MR. J.G. ZUMA BEFORE THE COMMISSION: LIST OF WITNESS Acknowledgment of Commission letter dated 06 May 2019.	128
64.	Letter from the Commission to Lugisani Mantsha Attorneys, dated 13 May 2019 RE: NOTICE IN TERMS OF RULE 3.3: MR RAJESH SUNDARAM Acknowledgment of receipt, of letter dated 09 May 2019	130
65.	Emil from the Commission to Lugisani Mantsha Attorneys, dated 14 May 2019, acknowledging of receipt RE: APPEARANCE OF FORMER PRESDEINT MR. J.G. ZUMA BEFORE THE COMMISSION: LIST OF WITNESS	131

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	Acknowledgment of receipt, of letter dated 09 May 2019	
66.	<p>Letter from the Commission to Lugisani Mantsha Attorneys, dated 29 May 2019,</p> <p>RE: APPEARANCE OF FORMER PRESDEINT MR. J.G. ZUMA BEFORE THE COMMISSION</p> <p>Letter referring to letter dated 30 April 2019, advising that they have not received a response.</p>	132
67.	<p>Letter from Lugisani Mantsha Attorneys to Mabunda Incorporated, dated 31 May 2019,</p> <p>RE: APPEARANCE OF FORMER PRESDEINT MR. J.G. ZUMA BEFORE THE COMMISSION</p> <p>Response to Commission's letter dated 30 April 2019, in respect of our client rejection the Commission's letter dated 30 April.</p>	133-136
68.	<p>Email from the Commission to Lugisani Mantsha Attorneys, dated 31 May 2019, acknowledging of receipt</p> <p>RE: APPEARANCE OF FORMER PRESDEINT MR. J.G. ZUMA BEFORE THE COMMISSION</p>	137

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	Acknowledgement of our letter dated 31 May 2019.	
69.	<p>Letter from the Commission to Lugisani Mantsha Attorneys, dated 7 June 2019</p> <p>RE: APPEARANCE OF FORMER PRESDEINT MR. J.G. ZUMA BEFORE THE COMMISSION</p> <p>With reference of our letter dated 31 May 2019. Commission is not clear what the basis our client's view , that because the Chairperson may have mentioned our client's name in regard to the work of the Commission.</p> <p>Requesting us to indicate which witness' Rule 3.3 that our client did not receive.</p>	138-140
70.	<p>Letter from Lugisani Mantsha Attorneys to the Commission, dated 12 June 2019</p> <p>RE: APPEARANCE OF FORMER PRESDEINT MR. J.G. ZUMA BEFORE THE COMMISSION</p> <p>With reference to Commission's letter dated 07 June and 30 May 2019. Advising the Commission that their unfounded</p>	141-145

J. Bell

	suggestion that our client is unwilling to cooperate with the Commission.	
71.	<p>Letter from the Commission to Lugisani Mantsha Attorneys, dated 20 June 2019</p> <p>RE: APPEARANCE OF FORMER PRESDEINT MR. J.G. ZUMA BEFORE THE COMMISSION</p> <p>Letter referring to our letter, dated 12 June. Advising our client to testify on the issues or matters of the evidence given by the witnesses.</p>	146-147
72.	<p>Email from the Commission to Lugisani Mantsha Attorneys, dated 24 June 2019</p> <p>RE: NOTICE IN TERMS OF RULE OF RULE 3.3 / NXASANA</p> <p>Receipt of Nxasana's Notice in terms of Rule 3.3.</p>	148
73.	<p>Email from Commission to Lugisani Mantsha Attorneys, dated 25 June 2019</p> <p>RE: RE: NOTICE IN TERMS OF RULE OF RULE 3.3 / SINDANE</p>	149

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	Receipt of Sindane's Notice in terms of Rule 3.3	
74.	<p>Letter from Lugisani Mantsha Attorneys to the Commission, dated 24 June 2019</p> <p>RE: APPEARANCE OF FORMER PRESIDENT, MR JACOB ZUMA, BEFORE THE COMMISSION</p> <p>Revised letter, taking note of the public press Statement, issued by Commission.</p> <p>Advising that our client will attend the Commission's proceedings of 15 to 19 July 2019.</p> <p>Furthermore, requesting the Commission to highlight issues of various concerns.</p>	150-154
75.	<p>Email from Lugisani Mantsha Attorneys to the Commission, dated 25 June 2019</p> <p>RE: NOTICE IN TERMS OF RULE OF RULE 3.3 / SINDANE and NXASANA</p> <p>Acknowledgement of Notice in terms of Rule 3.3.</p>	155-156

J. J. J.

76.	<p>Letter from the Commission to Lugisani Mantsha Attorneys, dated 25 June 2019</p> <p>RE: APPEARANCE OF FORMER PRESIDENT, MR JACOB ZUMA, BEFORE THE COMMISSION</p> <p>Letter taking note of the undertaking furnished by our client.</p>	157
77.	<p>Letter from the Commission to Lugisani Mantsha Attorneys, dated 1 July 2019</p> <p>RE: COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE ("THE COMMISSION") // NOTICE IN TERMS OF RULE 3.3</p> <p>Hearing photo element of Nxasana's hearing, due to colander arrangements</p>	158
78.	<p>Email from the Commission to Lugisani Mantsha Attorneys, dated 1 July 2019</p> <p>RE: ADDITIONAL DOCUMENTS</p>	159

J. J. L.

	Email advising Yvonne that the Commission will be sending a large volume of additional information	
79.	Letter from the Commission to Lugisani Mantsha Attorneys, dated 1 July 2019 RE: STATEMENT OF WITNESSES Letter advising us that the Commission will deliver arch-lever files containing evidence of the witnesses referred to in their letter dated 06 May 2019	160
80.	Letter from the Commission to Lugisani Mantsha Attorneys, dated 30 July 2019 RE: COMMISSION'S AREAS OF INTEREST Letter advising LM Attorneys based on schedule of the "areas of interest" from the witnesses' Statements.	161-162
81.	Letter from the Commission to Lugisani Mantsha Attorneys, dated 30 July 2019 RE: MR. NXASANA TO APPEAR AT THE COMMISSION AGAIN	163-164

S. A. K.

	Letter advising that due to change of colander arrangements, Mr Nxasana will appear on 19 August 2019	
82.	<p>Letter from Lugisani Mantsha Attorneys to the Commission, dated 16 August 2019</p> <p>RE: RESPONSE TO COMMISSION'S LETTER OF 'AREAS OF INTEREST'</p> <p>LM Attorneys requesting Chairperson that the dates being requested be treated as non-binding targets.</p>	165-169
83.	<p>Letter from the Commission to Lugisani Mantsha Attorneys, dated 28 August 2019</p> <p>RE: COMMISSION'S LETTER SENT IN ERROR</p> <p>The Commission is confirming a withdrawal of their letter dated 17 July 2019 whereby the Chairperson had invited our client to meet with him in respect of Mr. Agrizzi's Statement</p>	170-171
84.	<p>Email from Lugisani Mantsha Attorneys to the Commission, dated 28 August 2019</p> <p>RE: COMMISSION'S LETTER SENT IN ERROR</p>	172

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	Confirmation of receipt of the Commission's letter dated 28 August 2019	
85.	<p>Letter from Lugisani Mantsha Attorneys to the Commission, dated 4 September 2019</p> <p>RE: PRIOR RESPONSE TO COMMISSION'S LETTER OF "AREAS OF INTEREST" DATED 16 AUGUST</p> <p>Requesting the Commission to avoid the inconvenience and costs of our client coming in and out of the Commission to respond to the same allegations, we propose that our client should rather be called at the end of all the evidence which implicates him.</p>	173-176
86.	<p>Letter from the Commission to Lugisani Mantsha Attorneys, dated 10 September 2019</p> <p>RE: MEETING REQUEST WITH COUNSEL</p> <p>Justice Zondo requesting for a meeting with our counsel and Adv SC Pretorius at the Commission, on 11 September 2019.</p>	177

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87.	<p>Letter from Lugisani Mantsha Attorneys to the Commission, dated 10 September 2019</p> <p>RE: RESPONSE TO HON. JUSTICE ZONDO'S MEETING REQUEST WITH COUNSEL</p> <p>LM Attorneys confirming that our Mr. Mantsha will be available to attend the meeting</p>	178-180
88.	<p>Letter from the Commission to Lugisani Mantsha Attorneys, dated 10 September 2019</p> <p>RE: COMMISSION'S RESPONSE TO OUR LETTER DATED 23 AUGUST</p> <p>Confirmation of dates set aside for the Former President's next appearance before the Commission.</p>	181-182
89.	<p>Letter from the Commission to Lugisani Mantsha Attorneys, dated 11 September 2019</p> <p>RE: COMMISSION'S LETTER CONFIRMING MEETING REQUEST</p>	183

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	Letter requesting confirmation of dates set aside for the meeting dated 11 September at 16h30	
90.	<p>Email from Lugisani Mantsha Attorneys to the Commission, dated 11 September 2019</p> <p>RE: EMAIL CONFIRMING MEETING WITH THE COMMISSION</p> <p>Confirming that Mr. Mantsha will attend the meeting of 11 September 2019</p>	184
91.	<p>Email from the Commission to Lugisani Mantsha Attorneys, dated 11 September 2019</p> <p>RE: ACKNOWLEDGMENT OF EMAIL FROM LM ATTORNEYS</p> <p>Mr W Redcliffe has taken note of our email dated 11 September 2019</p>	185
92.	Letter from the Commission to Lugisani Mantsha Attorneys, dated 11 September 2019	186-187

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	<p>RE: ALLEGED MISCOMMUNICATION OF DATES CONFIRMED IN OUR LETTER DATED 04 SEPTEMBER 2019</p> <p>Adv. Pretorius raising "incorrect" communications of fixed-dates and addressing such terms to the counsel.</p>	
93.	<p>Letter from the Commission to Lugisani Mantsha Attorneys, dated 13 September 2019</p> <p>RE: COMMISSION REQUEST FOR CONFIRMATION OF DATES</p> <p>Deputy Chief Justice requesting the legal team for a confirmation of dates set for 14 October 2019 to 25 October 2019 and for 11 November 2019 to 15 November 2019</p>	188-189
94.	<p>Letter from Lugisani Mantsha Attorneys to the Commission, dated 17 September 2019</p> <p>RE: ANSWERS TO THE QUESTIONS RAISED BY THE COMMISSION</p> <p>LM Attorneys advising the Commission that our client is required to consult persons whom he has worked with prior to serving the answers to the Commission's questions.</p>	190-192

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95.	<p>Letter from Lugisani Mantsha Attorneys to the Commission, dated 17 September 2019</p> <p>RE: RESSPONSE TO COMMISSION'S LETTER OF 13 SPTEMBER 2019</p> <p>Letter advising the Commission that our client can attend the Commission hearing on the week of the 11 to 15 November 2019.</p>	193-195
96.	<p>Letter from the Commission to Lugisani Mantsha Attorneys, dated 27 September 2019</p> <p>RE: CHAIPERSON ADVISED:</p> <p>The Chairperson has advised excuses the Former President to attend Commission on days required</p> <p>However, Chairperson will not excuse any other dates for his appearance at the Commission unless an application is made to the Commission for an order excusing him from appearing at the Commission.</p>	196-198

5 J. K. S.

97.	<p>Letter from the Commission to Lugisani Mantsha Attorneys, dated 27 September 2019</p> <p>RE: DELIVERY OF SUBMISSIONS BY THE FORMER PRESIDENT</p> <p>Chairperson requesting the Former President to provide the Commission with affidavits before 04 October 2019.</p>	199-201
98.	<p>Letter from the Commission to Lugisani Mantsha Attorneys, dated 30 September 2019</p> <p>RE: CHAIRPERSON'S INCLUDED A SECOND DIRECTION CONTAINED PARA 6 OF LETTER DATED 27 SEPTEMBER 2019</p> <p>The Second directive in para 6 will States that the deadline in 1 is provisional until 2 October 2019 to allow the Former President to make representations on or before 2 October 2019</p>	202-203
99.	<p>Letter from Lugisani Mantsha Attorneys to the Commission, dated 1 October 2019</p> <p>RE: RESPONSE TO LETTER 27 SEPTEMBER</p>	204-206

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	<p>Letter advising the Commission that the Former President's criminal case had been postponed to 15 October 2019 and that it was not clear what was going to happen hence he was also awaiting for judgement in his application.</p> <p>Further advising that the Former President is still committed to attend the Commission's proceedings during the dates from 11 to 15 November 2019 as per your letter dated 13 September 2019.</p>	
100.	<p>Letter from Lugisani Mantsha Attorneys to the Commission, dated 1 October 2019</p> <p>RE: REQUEST FOR INDUGENCE</p> <p>Letter requesting indulgence to provide the Commission with answers by 20 October 2019.</p>	207-209
101.	<p>Letter from Lugisani Mantsha Attorneys to the Commission, dated 1 October 2019</p> <p>RE: THE COMMISSION OF INQUIRY</p> <p>Letter requesting for any letters written by Adv. Pretorius to our SC, confirming arrangement agreements amongst themselves.</p>	210-212

5 J. Lee

102.	<p>Email from the Commission to Lugisani Mantsha Attorneys, dated 1 October 2019</p> <p>RE: EXHIBITS FROM COMMISSION</p> <p>Email informing us on exhibits which will be provided to our offices</p>	213
103.	<p>Email from the Commission to Lugisani Mantsha Attorneys, dated 1 October 2019</p> <p>RE: REQUEST FOR CELLPHONE NUMBER</p> <p>Commission requesting for cell phone number in order for us to obtain documents</p>	214-215
104.	<p>Copy of a letter delivered by hand from the Commission to Lugisani Mantsha Attorneys, dated 02 October 2019</p> <p>RE: EXHIBITS FROM COMMISSION</p> <p>Email informing us on exhibits which will be provided to our offices</p>	216

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105.	<p>Letter from the Commission to Lugisani Mantsha Attorneys, dated 4 October 2019</p> <p>RE: COMMISSION HEARING DATES</p> <p>Commission informing us that they will provide us with further days due to client's non-availability</p>	217-220
106.	<p>Letter from the Commission to Lugisani Mantsha Attorneys, dated 8 October 2019</p> <p>RE: AREAS OF INTEREST DOCUMENT</p> <p>Chairperson advising that the areas of interest document has been disclosed to the media</p>	221-222
107.	<p>Letter from Lugisani Mantsha Attorneys to the Commission, dated 15 October 2019</p> <p>RE: SITTING AT THE COMMISSION</p> <p>Letter advising the Commission that our client and his legal team were not available to attend the proposed sitting of the Commission in October.</p>	223-225

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108.	<p>Letter from the Commission to Lugisani Mantsha Attorneys, dated 15 October 2019</p> <p>RE: SUPPLEMENTARY BUNDLES</p> <p>Letter enclosing a bundle of affidavits provided by individuals who have implicated the Former President</p>	226-228
109.	<p>Email from the Commission to Lugisani Mantsha Attorneys, dated 17 October 2019</p> <p>RE: REQUEST FOR CELLPHONE NUMBER</p> <p>Commission requesting for cell phone number in order for us to obtain documents</p>	229-230
110.	<p>Email from the Commission to Lugisani Mantsha Attorneys, dated 22 October 2019</p> <p>RE: REQUEST FOR CELLPHONE NUMBER</p> <p>Commission requesting for cell phone number in order for us to obtain documents</p>	231



111.	Email from Commission acknowledging receipt, dated 24 October 2019	232
112.	Letter from Lugisani Mantsha Attorneys to the Commission, dated 28 October 2019 RE: FORMER PRESIDENT'S NOTICE OF INTENTION TO OPPOSE Letter enclosing former president's notice of intention to oppose	233-234
113.	Email from Commission dated 24 October 2019 ACKNOWLEDGING RECEIPT FORMER PRESIDENT'S NOTICE OF INTENTION TO OPPOSE	235
114.	Letter delivered by hand from Lugisani Mantsha Attorneys to the Commission, dated 01 November 2019 RE: COMMISSION HEARING Letter advising the Commission that he will not be able to attend the hearing due to hospitalization.	236-238

5 JLS

115.	<p>Letter from the Commission to Lugisani Mantsha Attorneys, dated 4 November 2019</p> <p>RE: RULE 3.4 APPLICATION: REDIHLENTSE TLHABI RE EVIDENCE OF MR. J.G ZUMA</p> <p>Chairperson requesting LM Attorneys to respond to Tlhabi's application within 7 days of receipt.</p>	239
116.	<p>Letter from the Commission to Lugisani Mantsha Attorneys, dated 6 November 2019</p> <p>RE: RULE 3.4 APPLICATION: REDIHLENTSE TLHABI RE EVIDENCE OF MR. J.G ZUMA</p> <p>Response to the Commission in respect of our to provide his comments in Redi Tlhabi's application</p>	240-241
117.	<p>Letter from the Commission to Lugisani Mantsha Attorneys, dated 15 November 2019</p> <p>RE: LETTER SENT IN ERROR</p> <p>Letter advising LM Attorneys that the letter of 04 November 2019 had been sent in error, without Chairperson's directive.</p>	242-243.

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118.	<p>Letter from the Commission to Lugisani Mantsha Attorneys, dated 3 December 2019</p> <p>RE: RULE 3.4 APPLICATION</p> <p>Requesting Former President to deliver written submissions before 9 December 2019</p>	244-245
119.	<p>Letter from Lugisani Mantsha Attorneys to the Commission, dated 4 December 2019</p> <p>RE: RULE 3.4 APPLICATION: REDIHLENTSE TLHABI RE EVIDENCE OF MR. J.G ZUMA</p> <p>Letter of request for indulgence to obtain instructions from our client.</p>	246-248
120.	<p>Letter from the Commission to Lugisani Mantsha Attorneys, dated 13 December 2019</p> <p>RE: COMMISSION HEARING</p> <p>Chairperson notifies that a date has been determined for 27 to 31 January 2020</p>	249

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121.	Letter from the Commission to Lugisani Mantsha Attorneys, dated 17 December 2019 RE: COMMISSION OF INQUIRY Report letter from the Commission	250-263
122.	Email from Commission to Lugisani Mantsha Attorneys Recall message for letter dated 17 December 2019	264

108. I hereto attach as marked "JGZ 1" to "JGZ 264", the correspondences referred above, and which are also referred throughout my affidavit.

RESPONSE TO KWEZI BRIGITTE SHABALALA AFFIDAVIT

109. I have read the affidavit of **Kwezi Brigitte Shabalala**. I have answered in general the application and the affidavit. I have also demonstrated how the affidavit is simply wrong both in fact and in law. For completeness I wish to reply to specific allegations as follows:

Ad paragraphs 1 – 4

110. Save to deny that Ms Shabalala has personal knowledge of the issues, the rest of the allegations are noted.

5 Jh

Ad paragraphs 5

111. The approach adopted by the Commission in relation to the relevant correspondence is wholly unsatisfactory and generally untrue. The correspondence relied on to make out a case against me should be attached and specific references made in relation to those issues that the Commission seeks to rely on in support of the relief that they seek. This would reveal the fallacy of the Commission's version.
112. It is simply irresponsible to blindly refer to correspondences without making proper references. I do not know which correspondence the deponent contends I have. The allegations are therefore denied, and the deponent must prove that I have the unattached correspondence referred to in this paragraph.
113. It is unhelpful to give my lawyers a bundle of documents on the day of the hearing of this matter. Doing so makes it difficult to consult and to prepare for the hearing of this application.
114. Again, it is an irresponsible strategy to hand up a bundle of correspondence not attached or specifically referred to in the affidavit to further prejudice me. The deponent cannot claim to have had no time to at the very least list all the letters that the Commission contends are relevant to this application. Giving a bundle of documents without any reference to the affidavit is unhelpful and will result in the unnecessary postponement of this frivolous application.

A handwritten signature in black ink, appearing to be 'J. T. G.', is located at the bottom right of the page.

115. Save as aforesaid and dealt with elsewhere in this affidavit, the remainder of the allegations contained in these paragraphs are denied.

Ad paragraphs 6 – 7

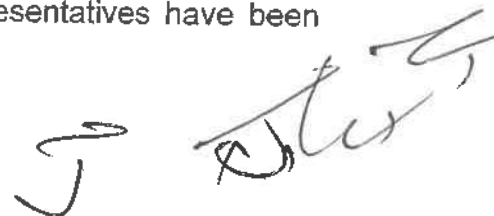
116. This application by the Legal Team of the Commission to request the Chairperson to take necessary steps to cause a summons to be issued for my appearance is an abuse of the process, frivolous and unfounded. It is above all not founded on true facts. I have, from the commencement of the Commission in August 2018, given the Commission and the Chairperson my full cooperation.

117. It is true that certain chosen witnesses have given their views to the Commission about how they experienced and saw the work of government. There is no requirement that I answer any or all of the carefully chosen Commission witnesses. The fact that my name is mentioned by a witness does not mean that I am implicated in criminal wrong-doing. I have a right not to answer the views of a witness about how I led government.

118. Save as aforesaid and dealt with elsewhere in this affidavit, the remainder of the allegations contained in these paragraphs are denied.

Ad paragraphs 8 - 9

119. From the commencement of the Commission, I have received several notices in terms of 3.3 of the commission and my legal representatives have been

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observing those testimonies made by each witness who allegedly implicated me.

120. Upon receipt of those notices, I have exercised my right under the rules of the Commission in relation to the witnesses. What I am content about is that the witnesses I have seen do not implicate me in criminal activities. I have responsibly exercised my rights in relation to the witnesses and should not be compelled to abandon my election.
121. Save as aforesaid and dealt with elsewhere in this affidavit, the remainder of the allegations contained in these paragraphs are denied.

Ad paragraphs 10 – 13

122. It is correct that the Chairperson expressed a wish for me to give him a response to the allegations made by these two witnesses. The Chairperson did not issue directive but expressed a wish for me to respond. Out of respect, I accepted the invitation. It now dawns on me that this was clearly an (indirect) summons. The Commission's application confirms my belief.
123. On 26 April 2019, a letter was delivered by email and was handed to the Commission on my behalf, on the 11 October 2019 the Commission was informed by my legal representative that we had requested information from the Presidency in order to provide accurate information to the Commission and respond to the invite that was extended by the Chairperson. Furthermore, on the said letter paragraph 3 it is stated that "*Presidency had only provided us*

5 *[Signature]*

with some of the information we had requested, only on the 24th April 2019, enclosed herewith find the copy of the email from Presidency enclosing some of the information that we have requested."

124. The Chairperson's "deep concern" was not understood for the information that he had required, it appears had already been in the possession of the Commission from the Presidency. It should not be expected that I should file an affidavit simply for the sake of it. In these circumstances, the Commission was in possession of evidence clearly refuting the evidence of Ms Mentor and to insist that I deal with that matter on affidavit was simply unfair and mischievous.

125. Save as aforesaid and dealt with elsewhere in this affidavit, the remainder of the allegations contained in these paragraphs are denied.

Ad paragraphs 14 and 15

126. It is true that the Chairperson addressed a letter as referred to in this paragraph.

127. On or about 31 May 2019, my legal representative sent a letter to the Commission wherein I rejected this accusation. I had eagerly corresponded with the Commission's legal team and made them aware that I have every interest to assist the Commission with facts, as I had mentioned above. This is the reason for my request to the Presidency for the necessary information. However, I stand accused of not cooperating when I was fully cooperative on setting out time to appear before the commission of which I did.

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128. Save as aforesaid and dealt with elsewhere in this affidavit, the remainder of the allegations contained in these paragraphs are denied.

Ad paragraph 17

129. The letter dated 31 May 2019 that was conveyed to the Commission specifically paragraph 10 stated the following:

"One the face of your letters, it is not clear to us in terms of which rule you make the request, assuming that your letter is issued in terms of Rule 3.10, we kindly request that you provide us with specific questions which the Chairperson wants our clients to respond to so that our client can meaningfully and comprehensively engage with the commission's request."

130. My legal team conveyed this message to the Commission on my behalf, in order for me to have a sense of understanding which information would be needed from me. As most of the things referred by the alleged witnesses transpired 9 or 10 years ago and I cannot be expected to recall everything and everyone I had come across during my years of being the President. Hence, I required questions to prepare myself and in order to assist the Commission's legal team, which was done in good faith. My request in this regard was not heeded. Again, this shows *mala fide* in my view.

131. Save as aforesaid and dealt with elsewhere in this affidavit, the remainder of the allegations contained in this paragraphs are denied.

5 J. L. S.

Ad paragraphs 18 and 19

132. It is true that such an undertaking was given and honoured. From the commencement of the Commission, I have given my full cooperation to the Chairperson and the Commission.

133. My appearance before Chairperson was voluntary. My legal team at all material times have been communicating with the Commission, observing evidence of those witnesses allegedly implicated me. I spent considerable amounts of time preparing for my appearance. I had been scheduled to appear for five days but that could not happen because of the conduct of the Commission's evidence leaders, in particular Advocate Pretorius who was intend in embarrassing me.

134. It was clear during my appearance that the evidence leaders were not interested in what I had to say but in what others had said about me. I was cross-examined on phone calls and correspondence and memos rather than on matters of substance relevant to the Commission's terms of reference.

135. Save as aforesaid and dealt with elsewhere in this affidavit, the remainder of the allegations contained in these paragraphs are denied.

Ad paragraph 20

136. It is correct that the Chairperson made an announcement regarding in chamber discussions that had taken place. This announcement elsewhere has become contentions and I would rather rely directly on the transcript that accept the

5 J. L. S.

summary of the deponent. First, the reason why I decided to withdraw my participation in the Commission are not set out at all in this paragraph. They are relevant to appreciating the conduct of the Commission evidence leaders, in particular Adv Pretorius SC. I set that out during my appearance and it is on record. Clearly, it is inconvenient for the Commission to refer to that part of the record so that a clear picture is painted.

137. Despite these recordals, the Commission has since placed the issue back into controversies by unilaterally imposing conditions that were not contemplated in the agreements made on the date.
138. It appears that the Commission has decided to abandon the spirit and purpose of the agreement. For example, there is no evidence that parties agreed on the dates that the Commission imposed on us, yet the agreement is that parties would agree. There is further no evidence that when parties failed to agree on a timetable, they both appeared before the Chairperson for him to hear and consider their respective views on the matter and thereafter make appropriate directives.
139. I have never said that I would not return to give evidence if I am required to do so. However the undertaking made were subject to the related agreements on the timetable.
140. I refer to paragraph 3 of my letter dated 24 June 2019 addressed to the Commission by my legal representative. Therein great disappointment was expressed by the continuous mistreatment by the Commission legal team

J. J. J. J.

despite our many efforts to cooperate with the Commission but instead I was treated like I am an accused:

"3 *having made the above undertaking, we do wish, for the record, to reiterate and highlight the following issues of concern:*

3.1 *our request to be furnished with specific questions was done in good faith, as envisaged in Rule 3.10, and in order to ensure that our client can assist the Commission fully prepared and thus more meaningfully;*

3.2 *your decision to issue a press statement amounts to nothing but a disinformation campaign and an unfortunate attempt at instigating the public against our client. We view this stratagem of naming and shaming our client as unfortunate and constituting a descension into the political arena by the commission.*

3.3 *As our previous correspondence bears testimony, our request that you provide us with specific questions was consistently accompanied by an undertaking that our client wishes to cooperate with the Commission. We had hoped that the*

5 [Signature]

Commission would find our approach more sensible and would have brought about a much closer approximation to the Commission's mandate (terms of reference) in respect of our client and his true understanding of the issues that pertain to him as the former Head of State;

3.4 *your press statement, the Chairperson's previous public comments about our clients and the refusal to furnish us with specific questions have all left us with the distinct impression that the Commission views our client as an accused and does not require our assistance in its truth finding mandate. This has also left us with the distinct impression that you seek your own truth and to deliver our client to the commission for public display and in order to ambush and humiliate than to fulfil the mandate of the Commission as set out in the terms of reference;*

3.5 *this is not what we understood to be your role, and as his legal representatives, we sought to ensure that we assist the commission in its work. However, you have constantly rejected our offer in this regard. According, you will have Mr. Zuma dates you have unilaterally determined."*



141. Despite our various attempts to show our issues of concern to the Commission, these are ignored. The Commission's attitude and conduct against me is very discouraging and questionable in terms of the intentions of the Commission.

142. Save as aforesaid and dealt with elsewhere in this affidavit, the remainder of the allegations contained in these paragraphs are denied.

Ad paragraphs 21 – 29

143. It is admitted that Adv Pretorius SC and Sikhakhane SC made contact about the arrangement for my future appearance. Despite my counsel being *bona fide*, it became clear that Adv Pretorius was interested in re-imposing broad areas of interests rather than specific questions.

144. The Chairperson stated the following during the Commission hearing:

“Chairperson: We’ll adjourn for the day and the former President will come back at another time that will be arranged.”⁹

145. On or about the 16 August 2019, my legal team responded to the Commission’s letter dated 30 July 2019 specifically paragraph 5 and 6 of the letter which stated that:

“5 In this regard, we kindly request that you bring this to the Chairpersons attention. We suggest that the dates being

⁹ Transcript dated 19 July 2019, day 136 of the commission pages 43, para 20.

5 2019

directed by the Chairperson serve as mere recommendation and/or proposal. In other words, we request that they be treated as non-binding targets and with the possibility of either party to request an extension should same be necessary.

6 *In the circumstances, please let us know whether the Chairperson is receptive of our correction about the terms of the process of engagement and whether he is amenable to our proposal."*

146. This is further proof that the Commission's statements and allegations against me that I am not being "cooperative" with the Commission are unfounded.

147. Furthermore, on 17 September 2019, a letter was addressed to the Commission, informing it that the dates imposed on me were not convenient to me and my legal team. I indicated that I was scheduled to appear in the criminal court in the Pietermaritzburg High Court during the week of 14 October 2019.

Paragraph 2 – 4 of the letter States:

"2 *Our client is scheduled to appear in the criminal court in the Pietermaritzburg High Court during the week of 14 October 2019, and therefore the proposed dates of the 14 October 2019 are not suitable.*

A handwritten signature in black ink, appearing to be 'J. D. ...', is located in the bottom right corner of the page.

3 *Our client will attend the Commission hearing on the week of the 11 to 15 November 2019 as proposed to proceed with his evidence.*

4 *The explanation given as reason for your apology is contrary to your letter dated 11 September 2019, and further email from your office dated the 11 of September 2019 which was sent to us at 12:57."*

148. This is further proof that my attorney has been in communication with the Commission and from my part I have updated the Commission every single step of the way.

149. Save as aforesaid and dealt with elsewhere in this affidavit, the remainder of the allegations contained in these paragraphs are denied.

Ad paragraph 30

150. The Commission knew why I was unable to appear on the dates in question. The reasons have never been regarded as frivolous or unreasonable.

151. When I could not appear at the Commission on those dates set by the Chairperson, I made sure that I did not leave the Commission with no information about my availability to attend its proceedings. In the letter referred to, my attorney confirmed that the dates of the 11 to 15 November 2019 were suitable to me and that I would attend the Commission.

A handwritten signature in black ink, appearing to be 'J. J. L.', is located at the bottom right of the page.

152. Save as aforesaid and dealt with elsewhere in this affidavit, the remainder of the allegations contained in this paragraph are denied.

Ad paragraphs 31 to 33

153. It is true that the Chairperson addressed this directive to me. I made considerable efforts to meet the directive including holding consultations with my legal team to address the so-called areas of interest. However, there were intervening factors that made it impossible for me to conclude my work on the submissions. These included the litigation pressure I faced as well my deteriorating health. As I have stated above, I am using the same legal team which is constrained - I suspect with design.

154. My efforts and contributions towards the Commission have been in good faith. I have conveyed each and every reason for my unavailability on imposed dates.

155. Save as aforesaid and dealt with elsewhere in this affidavit, the remainder of the allegations contained in these paragraphs are denied.

Ad paragraphs 34 to 35

156. I deny this allegation, save to say It is my understanding (as also confirmed by the transcript) that on the last day my appearance at the hearing it was agreed together with Commission legal team and Chairperson that my next appearance will be arranged -meaning that the Commission and myself will agree on suitable dates.

J. [Signature]

157. My attorney further informed the commission that my criminal case was postponed to 15 October 2019 and it is not clear what is going to happen hence I was waiting for judgment in my application.

158. On the 15 October 2019 my attorney sent a letter to the commission stating the following paragraph 2 to 4 of the said letter:

"2 Our client has now received a judgment in his permanent stay application which had informed the court today the 15 October 2019, that he is appealing the said judgment.

3 He is therefore required to submit his application for leave to appeal by 01 November 2019 and argue his application later during the month of November.

4 As a result of these events, our client and his legal team are not available to attend the proposed sitting of the Commission in October.

Clearly it was irrational and unreasonable to expect me and my legal team to work on extensive application for leave to appeal which was to be filled by 01 November 2019 And also attend commission sitting from 19 to 24 October 2019."

159. Save as aforesaid and dealt with elsewhere in this affidavit, the remainder of the allegations contained in these paragraphs are denied.

A handwritten signature in black ink, appearing to be 'S. J. G.', with a large flourish at the end.

Ad paragraphs 36 to 37

160. I have given reasons why I could not come to the Commission at the imposed dates. I cannot fathom why the Commission finds my reasons unreasonable.

161. Save as aforesaid and dealt with elsewhere in this affidavit, the remainder of the allegations contained in these paragraphs are denied.

Ad paragraphs 38 to 40

162. I am aware of these applications by Ms Tihabi. This is the month that I was not well. I have not been able to prepare a response to Ms Tihabi and when my medical situation improves I intend to give consideration to that application. If however the Commission should feel that my medical condition is irrelevant for the purpose of deciding Ms Tihabi's application, then it must make whatever decision it deems fit.

163. The application to issue summons though cannot be to assist Ms Tihabi with her application. If it is intended for that, I would say that it is an abuse of process and not consistent with the Act authorising the issuance of summons.

164. Save as aforesaid and dealt with elsewhere in this affidavit, the remainder of the allegations contained in these paragraphs are denied.

Ad paragraphs 42 to 45

5 J. K. G.

165. It is true that I was informed of this demand from the Commission. Unfortunately, I have a setback with my health. I need to focus more on improving in my health. I would be able to deal with Commission issues more effectively when my health improves. Whether or not that will be immediate does not depend on me.

166. I undertake to ask my doctor to furnish the Chairperson with a confidential note on my health condition and schedule for medical treatment. My last medical treatment was rigorous and required that I rest completely from the many demands made on me.

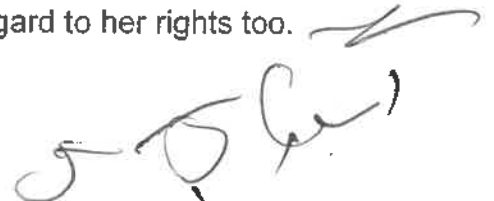
167. While I am sick, it is impossible for me to come to the Commission. If the Chairperson or the Commission do not believe that then they are at liberty to take any decision they deem appropriate.

168. Save as aforesaid and dealt with elsewhere in this affidavit, the remainder of the allegations contained in these paragraphs are denied.

Ad paragraphs 46 – 48

169. I am aware of these directives but due to my health condition I am unable to comply with them at this point.

170. Ms Tlhabi has her rights and I do not expect her to bend her attitude to accommodate anything that has to do with me. The Commission must decide the issues in accordance with fairness and with due regard to her rights too.

A handwritten signature in black ink, appearing to be 'J. B. G.', is located at the bottom right of the page.

171. Save as aforesaid and dealt with elsewhere in this affidavit, the remainder of the allegations contained in these paragraphs are denied.

Ad paragraphs 49 and 50

172. This is denied, I am informed that the offices were officially closed for December holiday season on 13 December 2019 and the employees left on or around about 3pm on that date and it appears that the letter was sent at 16:59pm this was obviously after my attorneys' offices were closed for December holidays.
173. Furthermore, on the 17th December 2019, my attorneys' offices were closed as for December holidays till 6 January 2020. Therefore, I did not fail to respond to the two mentioned letters.
174. Save as aforesaid and dealt with elsewhere in this affidavit, the remainder of the allegations contained in these paragraphs are denied.

Ad paragraphs 51.1 to 51.4

175. I deny these allegations for reasons that I have set above. As a fact, I have abided by the directives of the Chairperson and where I have not done so, I have offered a good reasons for doing so. As demonstrated above, my attorney has without fail conveyed to the Commission my position on matters raised by it. I have generally been receptive to the Commission's demand for my appearance and where I have not been able to, good reasons have been offered.

5 JAT

176. In any event, the reasons given in this paragraph for the issuance of summons do not provide a rational basis for the issuance of summons. Issuing summons to compel me from a hospital bed to testify at the Commission does not make sense is impractical. I would expect the Chairperson as a judge and the Legal Team understand this.

177. Further, such an order would violate my right to dignity and fundamentally be at odds with a fair hearing. It therefore serves no purpose to issue summons compelling me to appear before the Commission when I am physically unable to do so.

178. Save as aforesaid and dealt with elsewhere in this affidavit, the remainder of the allegations contained in these paragraphs are denied.

Ad paragraphs 52 to 54

179. The allegations in this paragraph are irrelevant to the issues. I have cooperated with the Commission as set out above and have indicated to the Commission my willingness to continue cooperating with it.

180. I am keen to have the issue regarding the constitutionality of the Commission resolved expeditiously so that we do not find ourselves in the conundrum similar to that of the Arms Deal Commission of Inquiry which has been set aside on review by a court of law.

5.10.2014

181. I request that Chairperson to consider appropriate directives dealing with my complaint that I believe that the Commission of Inquiry was not established in accordance with the Constitution. The fact that the High Court has given its orders does not dispose of the responsibility of the Commission to satisfy itself that it is operating lawfully and in accordance with the Constitution.

Ad paragraph 55

182. I deny this allegation. The application for me to be summoned to the Commission is baseless, an abuse of the process, frivolous and malicious. It can hardly be regarded as a device to advance the time-honoured right to be heard.

183. I have dealt with the rest of these allegations elsewhere in this affidavit and stand by those submissions.

184. Save as aforesaid and dealt with elsewhere in this affidavit, the remainder of the allegations contained in these paragraph are denied.

Ad paragraph 56

185. The constitutionality of the referred provision is highly questionable. I accept to the extent that it is correctly quoted that it says what it says. However, one striking feature of this legislation is that it is archaic and constitutionally suspect. The onus provisions for example appear to me to be unconstitutional.



186. However even if it were held that the provisions were constitutional, due regards must be had to the constitutional rights implicated when a person is compelled to appear and give evidence under compulsion of criminal sanction.

Ad paragraph 57

187. In the premises the application should be dismissed as unfounded and unmeritorious.



DEPONENT

I hereby certify that the deponent declares that he knows and understands the contents of this affidavit and that it is to the best of his knowledge both true and correct. This affidavit was signed and sworn to before me at Park View on this 13th day of January 2020 and the Regulations contained in Government Notice R1258 of 21 July 1972, as amended, have been complied with.




COMMISSIONER OF OATHS

"J9ZA"

info@lugisanimantshaattorneys.co.za

From: info@lugisanimantshaattorneys.co.za
Sent: Monday, 06 January 2020 14:12
To: 'Boipelo B. Ratshikana'
Cc: 'Shannon S. Van Vuuren'; 'Ppretorius@commissionsc.org.za'
Subject: NOTICE OF INTENTION TO OPPOSE - FORMER PRESIDENT JACOB ZUMA
Attachments: Letter to the Commission dated 06 Jan 2020.pdf; Notice of intention to oppose.pdf

Dear Sirs/Madams

We refer to the above matter and enclose a letter and our client's Notice of Intention to Oppose.

Kind regards,
D Arnoldi



LUGISANI MANTSHA ATTORNEYS

✉ info@lugisanimantshaattorneys.co.za ☎ 011 761 0020 🌐 www.lugisanimantshaattorneys.co.za

📍 417 Jan Smuts Ave Sandton Midrand Office Park Block 8

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Box 1127 | Randburg | 2125

Our Ref: Mr. D Mantsha LM0257/18/C

The Chairperson of the Commission of Inquiry

C/O Ms. B.K Shabalala

Acting Secretary of the Commission of Inquiry

Per email: BoipeloR@commissionsc.org.za

Date: 06 January 2020

PRIVATE AND CONFIDENTIAL

"URGENT"

Dear Sir/Madam,

RE: NOTICE OF INTENTION TO OPPOSE - FORMER PRESIDENT JACOB ZUMA

1. We refer to the above matter and your letter of 19 December 2019 and advise you that our offices had been closed from 13 December 2019 and reopened today, the 06th January 2020.
2. We enclose herewith, the Former President's Notice of Intention to Oppose your application.
3. Furthermore, be advised that our client will have his affidavit served on you before close of business on 10 January 2020.

Yours Faithfully

Mr. L.D Mantsha

Transmitted electronically without signature

Director: Lugisani Mantsha Bjuris, LLB
Lugisani Mantsha Incorporated Reg: 2012/069234/21

CC: Adv Pretorius SC
Per email: Ppretorius@commissionsc.org.za
And to: ShannonV@commissionsc.org.za



"J9ZB"

info@lugisanimantshaattorneys.co.za

From: info@lugisanimantshaattorneys.co.za
Sent: Friday, 10 January 2020 12:06
To: 'Boipelo B. Ratshikana'
Cc: 'Shannon S. Van Vuuren'; 'Ppretorius@commissionsc.org.za'
Subject: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MR. JACOB ZUMA
Attachments: Letter to the Commission dated 10 Jan 2020.pdf

Dear Madam,

Please find attached hereto a letter for your attention.

Kind regards,
Yvonne



LUGISANIMANTSHA ATTORNEYS

✉ info@lugisanimantshaattorneys.co.za ☎ 011 761 0099 🌐 www.lugisanimantshaattorneys.co.za

📍 410 Jan Smuts Ave Burnside Island Office Park Block C

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Box 1127 | Randburg | 2125 |

Our Ref: Mr. D Mantsha LM0257/18/C

The Chairperson of the Commission of Inquiry

C/O Ms. B.K Shabalala
Acting Secretary of the Commission of Inquiry
Per email: BoipeloR@commissionsc.org.za

Date: 10 January 2020

PRIVATE AND CONFIDENTIAL
"URGENT"

Dear Sir/Madam,

RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MR. JACOB ZUMA

1. We refer to the above matter and our letter dated 06 January 2020.
2. We advise that we will not be able to serve our client's affidavit due to the fact that our client underwent a medical surgery procedure on the 6 and 09 January 2020, we will endeavour to provide you with his affidavit on or before the 14 January 2020.

Yours Faithfully

Mr. L.D Mantsha
Transmitted electronically without signature

CC: Adv Pretorius SC
Per email: Ppretorius@commissionsc.org.za
And to: ShannonV@commissionsc.org.za

Director: Lugisani Mantsha Bjuris, LLB
Lugisani Mantsha Incorporated Reg: 2012/069234/21

'Jgzc'

info@lugisanimantshaattorneys.co.za

From: info@lugisanimantshaattorneys.co.za
Sent: Tuesday, 17 September 2019 09:49
To: 'Boipelo B. Ratshikana'; 'Shannon S. Van Vuuren'; 'Ppretorius@commissionsc.org.za'
Subject: THE COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF THE STATE ("THE COMMISSION")
Attachments: Letter to the Commission of Inquiry 17 September 2019.pdf

Dear Sir/Madam,

Please find attached hereto a letter for your attention.

Kind regards
Yvonne



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Box 1127 | Randburg | 2125 |

Our Ref: Mr. D Mantsha LM0257/18/C

Your ref: Ms B.K Shabalala / Ms L. Buthelezi
Att The Chairperson of the Commission of Inquiry
Att: Ms. B.K Shabalala
Acting Secretary of the Commission of Inquiry
Per email: BoipeloR@commissionsc.org.za

Att: Adv Pretorius SC
Per email: Ppretorius@commissionsc.org.za
And to: ShannonV@commissionsc.org.za

Date: 17 September 2019

PRIVATE AND CONFIDENTIAL
(URGENT)

Dear Sir/Madam,

RE: THE COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF THE STATE ("THE COMMISSION")

1. We refer to the above matter and your letter dated 13 September 2019.
2. Our client is scheduled to appear in the criminal court in the Pietermaritzburg High Court during the week of 14 October 2019, and therefore the proposed dates of 14 to 25 October 2019 are not suitable to him.

Director: Lugisani Mantsha Bjuris, LLB
Lugisani Mantsha Incorporated Reg: 2012/069234/21

3. Our client will attend the Commission hearing on the week of the 11 to 15 November 2019 as proposed to proceed with his evidence.
4. The explanation given as reason for your apology is contrary to your letter dated the 11 September 2019, and further email from your office dated the 11 of September 2019 which was sent to us at 12:57.

Yours faithfully

Mr. L.D Mantsha

Transmitted electronically without signature



"Jgzo"



LUGISANI MANTSHA ATTORNEYS

First floor | Burnside Island | Block 6 | 410 Jan Smuts Ave | Craighall | Johannesburg
Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: Info@lugisanimantshaattorneys.co.za |
Box 1127 | Randburg | 2125 |

Our Ref: Mr. D Mantsha LM0257/18/C

Your Ref: Ms. B.K Shabalala / Ms. L. Buthelezi
Att: The Chairperson of the Commission of Inquiry

Att: Ms. B.K Shabalala
Acting Secretary of the Commission of Inquiry
Per email: BoipeloR@commissionsc.org.za

Att: Adv Pretorius SC
Per email: Ppretorius@commissionsc.org.za
And to: ShannonV@commissionsc.org.za

Date: 15 October 2019

PRIVATE AND CONFIDENTIAL

"URGENT"

Dear Sir/Madam,

RE: THE COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF THE STATE ("THE COMMISSION") // FORMER PRESIDENT MR. J.G. ZUMA

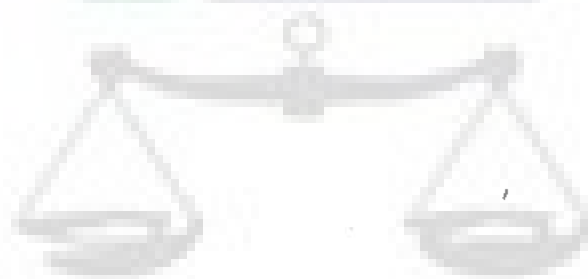
1. We refer to the above matter and our previous correspondences wherein, we stated that in light of the then impending decision in respect of the former President's application for the permanent stay, we were not in a position to confirm the proposed dates of his appearance in the month of October.

2. Our client has now received a judgment in his permanent stay application which he had informed the court today the 15 October 2019, that he is appealing the said judgment.
3. He is therefore required to submit his application for leave to appeal by 01 November 2019 and argue his application later during the month of November.
4. As a result of these events, our client and his legal team are not available to attend the proposed sitting of the Commission in October.

Yours Faithfully

Mr. L.D Mantsha

Transmitted electronically without signature



"Jgze"



LUGISANI MANTSHA ATTORNEYS

First floor | Burnside Island | Block 6 | 410 Jan Smuts Ave | Craighall | Johannesburg
Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: info@lugisanimantshaattorneys.co.za |
Box 1127 | Randburg | 2125 |

ACKNOWLEDGMENT OF RECEIPT

Name: Lerato Bumelezi

Occupation/Designation: DCT's Legal Researcher (aka....)

Organisation: State Capture Commission

Time Received: 14h12

Date Received: 1 November 2019

Signature: [Signature]



LUGISANI MANTSHA ATTORNEYS

First floor | Burnside Island | Block 6 | 410 Jan Smuts Ave | Craighall | Johannesburg
Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: Info@lugisanimantshaattorneys.co.za |
Box 1127 | Randburg | 2125 |

Our Ref: Mr. D Mantsha LM0257/18/C

Chairperson of the Commission of Inquiry into State Capture
2nd Floor Hillside House
17 Empire Road
Parktown
Johannesburg
2193

By hand

Date: 01 November 2019

PRIVATE AND CONFIDENTIAL
"URGENT"

Dear Chairperson,

RE: THE FORMER PRESIDENT MR. J.G ZUMA

1. We refer to the above matter and advise that former President was admitted in Hospital over the past weekend and was released late afternoon yesterday for him to continue treatment at his home.
2. The former President asked us to convey to you that due to the above he will not be able to attend the scheduled sitting of the Commission commencing on 11 November 2019 to 15 November 2019, he will however keep you updated on his recovery progress.

Director: Lugisani Mantsha Bjuris, LLB
Lugisani Mantsha Incorporated Reg: 2012/069234/21

Yours Faithfully

Mr. L.D Mantsha



"J92F"



2nd floor, Hillside House
17 Empire Road,
Parktown
Johannesburg
2193
Tel: (010) 214-0651

Email:

inquiries@sastatecapture.org.za

Website:

www.sastatecapture.org.za

**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

27 September 2019

Our reference:
Your reference:

Ms. KB. Shabalala / Ms. L. Buthelezi
Mr. D. Mantsha LM0257/18/C

Lugisani Mantsha Attorneys
First Floor
Burnside Island
Block 6
410 Smuts Avenue
Craigball
Johannesburg

Email: info@lugisanimantshaattorneys.co.za
dan@lugisanimantshaattorneys.co.za

ATT: Mr D. Mantsha

Dear Sir

**THE COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF
STATE ("THE COMMISSION") // FORMER PRESIDENT MR. J.G. ZUMA ("Your
Client")**

1. We refer to your letter of 17 September 2019.
2. We note that you say in your letter that the former President is scheduled to appear in the Pietermaritzburg High Court during the week of 14 October 2019 but you do not say on which day or days during that week he is required to appear in that Court. You then say that the former President will appear before

the Commission from 11 to 15 November 2019 but you say nothing about the week of 21 to 25 November 2019 which is the second of the three weeks set aside for the former President's appearance before the Commission.

3. I am directed by the Chairperson to advise that:

- (a) he excuses the former President from appearance before the Commission on the day or days on which he is required to appear before the criminal court in Pietermaritzburg but you are required to specify that date or those dates.
- (b) in respect of any other dates set aside for the former President's appearance before the Commission on which the former President will not be appearing in the criminal court in Pietermaritzburg, he is not excused from appearance at this stage but, should he wish to be excused, a substantive application should be made to the Commission for an order excusing him from appearance before the Commission on the date or dates in question or for an order varying or amending the dates currently fixed for his appearance before the Commission; in making such an application cogent reasons or good cause should be shown for such an order, particularly bearing in mind that, as things presently stand, the Commission's lifespan goes only up to the end of February 2020 and there are many witnesses and implicated persons whom the Commission must still give an opportunity to testify before it.
- (c) if a substantive application such as is referred to in (b) above is delivered to the Commission and is granted by the Chairperson, the former President will not be required to appear on the day or days on which the Chairperson will have excused him from appearing before the Commission; if, however, no application such as is referred to in (b) above is delivered or one is delivered but is dismissed by the Chairperson, the former President will be required to appear before the Commission on all the days on which he will not have been excused from appearing before the Commission.

Yours sincerely



Ms/ KB Shabalala

Acting Secretary

**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE
CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING
ORGANS OF STATE**



"J929"

info@lugisanimantshaattorneys.co.za

From: info@lugisanimantshaattorneys.co.za
Sent: Tuesday, 01 October 2019 10:52
To: 'Boipelo B. Ratshikana'; 'Shannon S. Van Vuuren'; 'Ppretorius@commissionsc.org.za'
Subject: THE COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF THE STATE ("THE COMMISSION")
Attachments: Letter to the Commission dated 30 SEP 2019.pdf; ZUMA LETTER TO THE COMMISSION 16 AUGUST 2019.pdf

Dear Sir/Madam,

Please find attached hereto a letter for your attention.

Kind regards,
Yvonne



LUCISA NTSHEMA ATTORNEYS

info@lugisanimantshaattorneys.co.za 011 781 0000 www.lugisanimantshaattorneys.co.za

216 Jan Smuts Ave Bunkle Island Office Park Block G

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LUGISANI MANTSHA ATTORNEYS

First floor | Burnside Island | Block 6 | 410 Jan Smuts Ave | Craighall | Johannesburg
Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: info@lugisanimantshaattorneys.co.za
Box 1127 | Randburg | 2125 |

Our Ref: Mr. D Mantsha LM0257/18/C

Your Ref: Ms B.K Shabalala / Ms L. Buthelezi
Att: Ms. B.K Shabalala
Acting Secretary of the Commission of Inquiry
Per email: BoipeloR@commissionsc.org.za

Att: Adv Pretorius SC
Per email: Ppretorius@commissionsc.org.za
And to: ShannonV@commissionsc.org.za

Date: 30 September 2019

PRIVATE AND CONFIDENTIAL
(URGENT)

Dear Sir/Madam,

RE: THE COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF THE STATE ("THE COMMISSION")

1. We refer to your letter of 27 September 2019.
2. We are utterly disappointed that the Commission has reneged on the recorded statement by the Chairperson which he publicly announced at the last day of the former President appearance at the hearing that his next appearance will be arranged, this meant that the Commission and ourselves will agree on suitable dates for his next appearance .

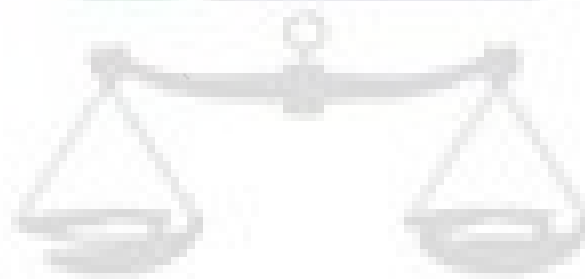
Director: Lugisani Mantsha Bjuris, LLB
Lugisani Mantsha Incorporated Reg: 2012/069234/21

3. The Former President's criminal case is postponed to 15 October 2019. As things stand, it is not clear to us what is going to happen hence he is also awaiting for judgement in his application .
4. However, the Former President is still committed to attend the Commission's proceedings during the dates from 11 to 15 November 2019 as per your letter dated 13 September 2019. Your letter dated 13 September 2019 did not propose the dates of 21 to 25 November 2019, and therefore we could not have taken instructions in respect of the said dates.

Yours faithfully

Mr. L.D Mantsha

Transmitted electronically without signature





ATTORNEYS AT LAW

2 Protea Road, Corner Riley, Bedfordview, 2008 Tel: (011) 450 2284/1641 Fax : (011) 450 1565
PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

01 August 2018

Mr Daniel Mantsha
LUGISANI MANTSHA ATTORNEYS
1st Floor Burnside Islands, Block 6
410 Jan Smuts Avenue
Craighall
Johannesburg, 2196

Dear Mr Mantsha

RE: MS MABEL PATRONELLA MENTOR/ MR JACOB GEDLEYIHLEKISA ZUMA

1. We refer to the above matter.
2. Following your telephonic conversation with our Mr Mabunda, you are referred to the information below: -

In terms of Rule 4A(1)(c) of the Uniform Rules of Court, which provides for service of documents and notices to be effected by electronic mail, we enclose herewith the following:

- 2.1 Notice in terms of Rule 3.3 of the Judicial Commission of Inquiry into allegations of State Capture, Corruption and Fraud in the Public Sector including Organs of State.
3. Kindly acknowledge receipt hereof and further that you are agreeable to service of the Notices by electronic email as provided for in terms of Rule 4A(1)(c) of Uniform Rules of Court.
4. The original notices will be served by the Sheriff as per the rules.

Director: **Pritzman Busani Mabunda**: B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: **Dewald Leonard Viljoen**: B Proc (RAU), LLM (International Law) (UJ); **S'fiso Malongoana**: LLB (UNIZULU);
David Matome Mogale: B Proc (VISTA)

Reg No. 2001/006238/21 - VAT Registration No: 4262193299 - Practice Number 5046



MABUNDA
INCORPORATED

ATTORNEYS AT LAW

2 Protea Road, Corner Riley, Bedfordview, 2008 Tel: (011) 450 2284/1641 Fax : (011) 450 1566
PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

Yours Faithfully

Sifiso Molongoana – Senior Associate

Per Email: dan@lugisanimantshaattorneys.co.za



Director: *Pritzman Busani Mabunda:* B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: *Dewald Leonard Viljoen:* B Proc (RAU), LLM (International Law) (UJ); *Sifiso Molongoana:* LLB (UNIZULU);
David Matome Mogale: B Proc (VISTA)

Reg No. 2001/006238/21 • VAT Registration No: 4260193299 – Practice Number 5046

info

From: S'fiso Molongoana <sifiso.molongoana@mabundainc.com>
Sent: Thursday, 02 August 2018 9:14 AM
To: info@lugisanimantshaattorneys.co.za
Cc: Busani Mabunda
Subject: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE
Attachments: Notice of Rule 3.3 - Zuma-Mentor.pdf
Importance: High

RE : JG ZUMA/MENTOR

Good Day,

We refer to the above matter.

Kindly find annexed hereto the following for your attention and perusal

1. Notice in terms of Rule 3.3

The original notices will be served by the Sheriff as per the rules.

Kind Regards



S'fiso Molongoana - Senior Associate
MABUNDA INCORPORATED
Address: 2 Protea Road, Corner Ruy, Beestonburg, 2007
PO BOX 51228, Moshakotwana, 2107
BCEC 424 JRS
Tel: (011) 450 1641/2234
Fax: (011) 450 1655
Email: Sifiso.molongoana@mabundainc.com

4

info

From: S'fiso Molongoana <sifiso.molongoana@mabundainc.com>
Sent: Thursday, 02 August 2018 9:16 AM
To: info@lugisanimantshaattorneys.co.za
Cc: Busani Mabunda
Subject: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE
Attachments: Notice of Rule 3.3 - Zuma-Maseko.pdf
Importance: High

RE : JG ZUMA / MASEKO

Good Day,

We refer to the above matter.

Kindly find annexed hereto the following for your attention and perusal

1. Notice in terms of Rule 3.3

The original notices will be served by the Sheriff as per the rules.

Kind Regards



S'fiso Molongoana - Senior Associate
MABUNDA INCORPORATED
Address: 2 Protea Road, Corner Rye, Bedfordview, 2002
PO BOX 51215, Morningside, 2007
DOCEX 424, RMB
Tel: (011) 450 1841/2384
Fax: (011) 450 1555
Email: S'fiso.molongoana@mabundainc.com

5

Lugisani Mantsha Attorneys

To: S'fiso Molongoana
Subject: RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE

Dear Sir,

We acknowledge receipt of the Notice in terms of Rule 3.3.

Regards
Yvonne



First Floor, Burnside Island, Block 6, 410 Jan Smuts Ave, Craighall, Johannesburg, RSA
Box 1127, Randburg, 2125

Tel No 011 791 0799
Fax No 011 791 0520
Email info@lugisanimantshaattorneys.co.za
Web www.lugisanimantshaattorneys.co.za

From: S'fiso Molongoana <sifiso.molongoana@mabundainc.com>
Sent: Thursday, August 2, 2018 9:14 AM
To: info@lugisanimantshaattorneys.co.za
Cc: Busani Mabunda <busani@mabundainc.com>
Subject: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE
Importance: High

RE : JG ZUMA/MENTOR

Good Day,

We refer to the above matter.

Kindly find annexed hereto the following for your attention and perusal

1. Notice in terms of Rule 3.3

The original notices will be served by the Sheriff as per the rules.

dan

From: S'fiso Molongoana <sifiso.molongoana@mabundainc.com>
Sent: Friday, 03 August 2018 10:05 AM
To: dan@lugisanimantshaattorneys.co.za
Cc: Busani Mabunda
Subject: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE
Attachments: Notice of Rule 3.3 - Zuma-Maseko.pdf; Scanned From Mabunda Inc Printer [Downstairs].pdf
Importance: High

RE : MR THEMBA MVELI JAMES MASEKO / MR JACOB GEDLEYHLEKISA ZUMA

Good Day

The above matter refers.

In terms of Rule 4A(1)(c) of the Uniform Rules of Court, which provides for service of documents and notices to be effected by electronic mail. We enclose herewith the following:

1. Notice in terms of Rule 3.3 of the Judicial Commission of Inquiry into allegations of State Capture, Corruption and Fraud in the Public Sector including Organs of State.
2. A letter addressed to yourself.

Kindly acknowledge receipt hereof and further that you are agreeable to service of the Notices by electronic email as provided for in terms of Rule 4A(1)(c) of Uniform Rules of Court.

The original notices will be served by the Sheriff as per the rules.

Kind Regards



S'fiso Molongoana - Senior Associate

MABUNDA INCORPORATED

Address: 2 Protea Road, Corner Riley, Bedfordview, 2007
 PO BOX 61230, Markettown, 2107

GCEX 424 JHB

Tel: (011) 450 1841/2204

Fax: (011) 450 1556

Email: S'fiso.molongoana@mabundainc.com

dan

From: Busani Mabunda <busani@mabundainc.com>
Sent: Friday, 03 August 2018 10:06 AM
To: S'fiso Molongoana
Cc: dan@lugisanimantshaattorneys.co.za
Subject: Re: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE

This is not in line with my directives. Will my directives be followed please.

Kind Regards



On 03 Aug 2018, at 04:00, S'fiso Molongoana <sifiso.molongoana@mabundainc.com> wrote:

RE : MS MABEL PATRONELLA MENTOR / MR JACOB GEDLEYHLEKISA ZUMA

Good Day

The above matter refers.

In terms of Rule 4A(1)(c) of the Uniform Rules of Court, which provides for service of documents and notices to be effected by electronic mail. We enclose herewith the following:

1. Notice in terms of Rule 3.3 of the Judicial Commission of Inquiry into allegations of State Capture, Corruption and Fraud in the Public Sector including Organs of State.
2. A letter addressed to yourself.

Kindly acknowledge receipt hereof and further that you are agreeable to service of the Notices by electronic email as provided for in terms of Rule 4A(1)(c) of Uniform Rules of Court.

The original notices will be served by the Sheriff as per the rules.

Kind Regards



ATTORNEYS AT LAW

S'fiso Molongoana - Senior Associate

MABUNDA INCORPORATED
Address: 2 Protea Road, Corner Riley, Bedfordview, 2007
PO BOX 81238, Sandton, 2107
DOCEX 424 JHB
Tel: (011) 450 1641/2254
Fax: (011) 450 1586
Email: S'fiso.molongoana@mabundainc.com

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8

Lugisani Mantsha Attorneys

From: Lugisani Mantsha Attorneys <info@lugisanimantshaattorneys.co.za>
Sent: Tuesday, August 7, 2018 10:58 AM
To: 'S'fiso Molongoana'
Subject: MS MABEL PATRONELLA MENTOR, MR THEMBA MVELI JAMES MASEKO, NOTICES IN TERMS OF RULE 3.3 OF THE COMMISSION
Attachments: letter to Mabunda Inc 07 Aug 2018.docx

Dear Sir,

Attached please find a letter for your attention.

Regards
Yvonne



Lugisani Mantsha Attorneys

First Floor, Bumside Island, Block 6, 410 Jan Smuts Ave, Craighall, Johannesburg, RSA
Box 1127, Randburg, 2125

Tel No 011 781 0024
Fax No 011 781 0528
Email info@lugisanimantshaattorneys.co.za
Web www.lugisanimantshaattorneys.co.za

9



LUGISANI MANTSHA ATTORNEYS

First floor | Burnside Island | Block 6 | 410 Jan Smuts Ave | Craighall | Johannesburg
Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: info@lugisanimantshaattorneys.co.za |
Box 1127 | Randburg | 2125

Our Ref: Mr L D Mantsha LM0257/18/C

Att: Mr S Mologoana
Senior Associate
Mabunda Incorporated
Per email: sifiso.molongoana@mabundainc.com

Date: 07 August 2018

"PRIVATE AND CONFIDENTIAL"
"URGENT"

Dear Sir,

RE: **MS MABEL PATRONELLA MENTOR**
MR THEMBA MVELI JAMES MASEKO
NOTICES IN TERMS OF RULE 3.3 OF THE COMMISSION

1. We confirm that we are in receipt of notices in terms of Rule 3.3 of the Commission and had acknowledged them as per our email of 02 August 2018.
2. We further agree to service by email in respect of the said notices in terms of Rule 4A (1) (c) of Uniform Rule of Court.

Yours Faithfully

Mr L.D. Mantsha

Electronically sent and therefore not signed

Director: Lugisani Mantsha Bjuris, LLB
Lugisani Mantsha Incorporated Reg:2012/069234/21

Lugisani Mantsha Attorneys

From: S'fiso Molongoana <sifiso.molongoana@mabundainc.com>
Sent: Tuesday, August 7, 2018 11:38 AM
To: Lugisani Mantsha Attorneys
Cc: Busani Mabunda
Subject: RE: MS MABEL PATRONELLA MENTOR, MR THEMBA MVELI JAMES MASEKO, NOTICES IN TERMS OF RULE 3.3 OF THE COMMISSION

Good Morning Sir.

Your letter is hereby acknowledged and we note what you write.

We wish to thank you for your response.

We will keep you abreast of further developments.

Kind Regards



S'fiso Molongoana - Senior Associate

MABUNDA INCORPORATED

Address: 2 Protea Road, Corner Ruy, Bedfordview, 2007
 PO BOX 41234, Marshalltown, 2107

Phone: (011) 450 1541/15234

Fax: (011) 450 1555

Email: Sifiso.molongoana@mabundainc.com

From: Lugisani Mantsha Attorneys <info@lugisanimantshaattorneys.co.za>
Sent: Tuesday, August 7, 2018 10:58 AM
To: S'fiso Molongoana <sifiso.molongoana@mabundainc.com>
Subject: MS MABEL PATRONELLA MENTOR, MR THEMBA MVELI JAMES MASEKO, NOTICES IN TERMS OF RULE 3.3 OF THE COMMISSION

Dear Sir,

Attached please find a letter for your attention.

Regards
 Yvonne

Lugisani Mantsha Attorneys

From: Lugisani Mantsha Attorneys <info@lugisanimantshaattorneys.co.za>
Sent: Thursday, August 16, 2018 6:28 PM
To: 'S'fiso Molongoana'
Cc: 'busani@mabundainc.com'
Subject: NOTICE IN TERMS OF RULE 3.3 -MS MABEL PETRONELLA MENTOR
Attachments: Letter to Mabunda Inc_20180816_0002.pdf

Importance: High

Dear Sir,

Attached please find a letter for your urgent attention.

Regards
Yvonne



12



LUGISANI MANTSHA ATTORNEYS

First floor | Burnside Island | Block 6 | 410 Jan Smuts Ave | Craighall | Johannesburg
Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: info@lugisanimantshaattorneys.co.za |
Box 1127 | Randburg | 2125 |

Our Ref: Mr L.D Mantsha LM057/18/C

Your Ref: Secretary of the Commission

THE SECRETARY OF THE COMMISSION

C/O MABUNDA INCORPORATED

ATT: Mr S Molongana – Senior Associates

ATT: SECRETARY: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF
STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR,
INCLUDING

Per email: sfiso.molongoana@madundainc.com

Date: 15 August 2018

"PRIVATE AND CONFIDENTIAL"

"URGENT"

Director: Lugisani Mantsha Bjuris, LLB
Lugisani Mantsha Incorporated Reg:2012/069234/21

Dear Madam,

RE: NOTICE IN TERMS OF RULE 3.3 -MS MABEL PETRONELLA MENTOR

1. We are in receipt of your notice in terms of Rule 3.3, which contains allegations made by Ms Mabel Petronella "Vytjie" Mentor which you alleged implicates President Zuma for her removal from the position of Chairperson of the Portfolio Committee on Public Enterprises allegedly for refusing to meet with him in China in 2010.
2. We are in the process of preparing and advising President Zuma on the allegations set out in the affidavit or statement made Ms Mentor. It is not clear to us in what way, manner and substance the alleged statement or affidavit of Ms Mentor contains evidence that "implicates" our client in unlawful conduct.
3. Accordingly, and in order to advise our client and prepare an informed response to your notice and the allegations contained in Ms Mentor's statement, we request the following information which is relevant to our preparation:
 - 3.1. In so far as Ms. Mentor alleges that her removal as Chairperson of the Portfolio Committee on Public Enterprises was allegedly for refusing to meet with President Zuma in China in 2010, we request the official correspondence and the relevant record regarding the termination of her

appointment as the Chairperson of the Portfolio Committee on Public Enterprises.

("record of decision"):

- 3.2. We also wish to ascertain whether the Commission or Ms Mentor are in possession of other statements from the then Chief Whip of the ANC in Parliament or the then Secretary General of the ANC, confirming her removal and the reasons thereof.
- 3.3. We also assume that the Commission has had a consultation or consultations with Ms Mentor and/or her legal representatives. On the basis that this assumption is correct, has the Commission requested Ms Mentor to furnish it with such documents, as may be necessary to support the allegations? In particular, we assume that Ms Mentor must be in possession of official communication in respect of her removal as Chairperson of the Portfolio Committee on Public Enterprises.
- 3.4. In so far as your notice concludes that the discussion between Ms Mentor and Mr Ajay Gupta had anything to do with President Zuma, we request a statement, if any, suggesting that Mr Ajay Gupta's alleged knowledge of a cabinet reshuffling was obtained from President Zuma. If no such document exists, we request the basis for the conclusion that President Zuma was the source of such knowledge.



- 4.5 Firstly, in terms of which law or provision of the Constitution does the Commission or Ms Mentor allege that our client, as Deputy President or President of the Republic of South Africa, had the power to remove Ms Mentor from the position of Chairperson of the Portfolio Committee on Public Enterprises?
- 4.6 Secondly, the reason given by the Commission for our client's alleged dismissal of Ms Mentor from the position of Chairperson of the Portfolio Committee on Public Enterprise is that she refused to meet him in China in 2010. Does the Commission contend that our client was aware of Ms Mentor's business in China? The statement provided does not indicate whether our client or his office had engagement with Ms Mentor while she was on her business to China. If there was such engagement, kindly provide us with the details of such engagement.
- 4.7 Thirdly, in the statement Ms Mentor alleges that certain "men" called her room and conveyed to her that our client wished to see and speak to her. Does the Commission or Ms Mentor have a statement from the aforementioned persons who allegedly came to convey our alleged client's interest to see or speak Ms Mentor in China? If so, kindly furnish us with the statements of those persons. If not, on what basis does the Commission allege that our client is implicated or may be implicated in the dismissal of Ms Mentor from the position of Chairperson of the Portfolio Committee on

Public Enterprise, since it is not alleged that he personally called or spoke to Ms Mentor when she was allegedly in China at the same time as him.

4. The second basis on which the Commission alleges that our client is implicated or may be implicated in wrongdoing by Ms Mentor is that, it is alleged that in October 2010 and at the Gupta residence (a) Mr Ajay Gupta told Mentor that our client would be reshuffling the Cabinet the following week and (b) offered her the position of Minister of Public Enterprise if she facilitated the closure of the SAA-India route. The following is required to properly advise our client;

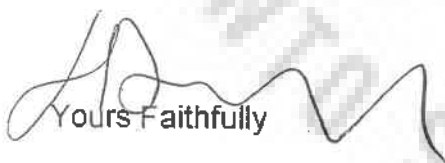
5.1 Firstly, is the Commission in possession of any statement or affidavit from Mr Ajay Gupta confirming the alleged conversation between Mr Ajay Gupta and our client on the basis of which it is alleged that our client conveyed his intention to Mr Ajay Gupta to reshuffle the Cabinet? If the Commission is in possession of such a document, we request that the Commission provides us with that document. If not, in what manner does Ms Mentor allege that Mr Ajay Gupta obtained the alleged knowledge of our client's intention to reshuffle the Cabinet from our client?

5.2 Secondly, on what legal basis does the Commission consider Ms Mentor's statement about Mr Ajay Gupta's alleged statement to her to constitute evidence against our client?



- 5.3 Does the Commission alleges that there is evidence in its possession that our client had a direct or indirect interest in the "closure of the SAA-India route", If not, on what basis is the statement of Ms Mentor evidence against our client of any wrong-doing? If yes, kindly provide the details of the alleged direct or indirect interest that our client allegedly has or had in the "closure of SAA-India route."
- 5.4 Does the Commission allege that it has evidence that our client considered Ms Mentor for a cabinet position as Minister of Public Enterprise? If so, please provide the details of such evidence. If not on what basis does the Commission allege that it has evidence that implicates our client in any wrong-doing?
5. We await your urgent response to the above enquiries, after which we will advise the Commission of our client's response to the notices.

Our client's rights are reserved in this regard.


Yours Faithfully

Mr. L.D. Mantsha



Lugisani Mantsha Attorneys

From: Lugisani Mantsha Attorneys <info@lugisanimantshaattorneys.co.za>
Sent: Thursday, August 16, 2018 6:25 PM
To: 'S'fiso Molongoana'
Cc: 'busani@mabundainc.com'
Subject: REPLY TO NOTICE IN TERMS OF RULE 3.3 OF THE RULES OF THE COMMISSION –
MASEKO ALLEGATIONS
Attachments: Letter to Mabunda Inc.pdf

Dear Sir,

Attached please find a letter for your urgent attention.

Regards
Yvonne





LUGISANI MANTSHA ATTORNEYS

First floor | Burnside Island | Block 6 | 410 Jan Smuts Ave | Craighall | Johannesburg
Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: info@lugisanimantshaattorneys.co.za |
Box 1127 | Randburg | 2125 |

Our Ref: Mr L.D Mantsha LM057/18/C

Your Ref: Secretary of the Commission

THE SECRETARY OF THE COMMISSION

C/O MABUNDA INCORPORATED

ATT: Mr S Molongana – Senior Associates

ATT: SECRETARY: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF
STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR,
INCLUDING ORGANS OF STATE

Per email: sfiso.molongoana@madundainc.com

Date: 15 August 2018

“PRIVATE AND CONFIDENTIAL”

“URGENT”

Director: Lugisani Mantsha Bjuris, LLB
Lugisani Mantsha Incorporated Reg:2012/069234/21

Dear Sir/Madam

**RE: REPLY TO NOTICE IN TERMS OF RULE 3.3 OF THE RULES OF THE
COMMISSION – MASEKO ALLEGATIONS**

1. We are in receipt of your notice in terms of Rule 3.3 of the rules of the commission ("the notice") dated 1st August. This notice contains allegations made by Mr. Themba Mveli James Maseko from which you allege *inter alia* (but mainly that it) ...

"implicates or may implicate" our client, President Jacob Gedleyihlekisa Zuma ("President Zuma") in "unlawful and improper conduct, including a violation of your constitutional obligations to act accountably and responsibly, in accordance with the obligations imposed on you in terms of section 92(2) and (3) of the Constitution; and also a violation of your constitutional obligations to conduct yourself free from a conflict of interest, and not to utilize information acquired by or which came to your possession as the President of the Republic to enrich or benefit yourself, the Gupta family or TNA Media (Pty) Limited, a company that was then owned or controlled by the Gupta family, and thereby acted inconsistent with the provisions of the section 96(2)(b) and (c) of the Constitution".

2. We wish to place it on record that we only received the notice on 02 August 2018.
3. We are in the process of advising President Zuma on the notices served upon us by the Commission. It is not clear to us, at this stage, in what way the allegations contained in Maseko's affidavit is construed as evidence that "*may implicate or implicates*" President Zuma in unlawful conduct as alleged by the Commission.

Director: Lugisani Mantsha Bjuris, LLB
Lugisani Mantsha Incorporated Reg:2012/069234/21



4. Nonetheless, for present purposes, we request the following information which is relevant for our preparation and meaningful consultation with our client:

Annexure A

- 4.1. In so far as Mr Maseko alleges that the termination of his contract as GCIS CEO was done at the instance of President Zuma, we request the official correspondence or any relevant record which relates to the termination of Mr Maseko's contract and effecting his appointment as the Director-General of Public Service and Administration ("record of decision");
- 4.2. We also wish to ascertain whether such correspondence, including minutes of the alleged consultations between President Zuma and the deceased Minister Collins Chabane, has been requested and/or obtained by the Commission from the relevant Government Department. If so, kindly furnish us with all such documentation;
- 4.3. We also assume that the Commission has had a consultation or consultations with Mr. Maseko and/or his legal representatives. On the basis that this assumption is correct, has the Commission requested Mr. Maseko to furnish it with such documents, as may be necessary to support the allegations? In particular, we assume that Mr. Maseko must be in possession of, at the very least, the letter terminating his own contract and

effecting his appointment as Director-General of the Public Service and Administration.

- 4.4. In paragraph 3.1.1 of the Notice the Commission alleges that the witness statement contains an allegation that President Zuma required Mr. Maseko to "... accede to the demands from the Guptas for Government advertising to be placed with their new media company with the purpose of benefitting that company without due respect and regard for compliance with procurement obligations imposed upon organs of state as are prescribed in section 217 (1) of the Constitution and section 53 (1) (a) (iii) of the Public Finance Management Act 1 of 1999 as amended." (own emphasis).
- 4.5. We can find no support for this allegation from any of the statements provided. Is the Commission in possession of any other statement on the basis of which this conclusion is reached? If so, kindly furnish us with such further statement. If we are wrong in our reading of any of the statements furnished to us in this regard, kindly point us to the specific allegation wherein President Zuma required Mr. Maseko to accede to the demands of the Guptas or to act unlawfully in any manner whatsoever.
- 4.6. In paragraph 3.1.2 of the Notice the Commission also alleges that the statements constitute evidence that President Zuma...

"... facilitated or sought to facilitate the Guptas' unlawful demands for the unlawful and improper procurement of government services to be



directed to their media company by requiring Mr. Maseko to ensure that they gain access to the entire budget of government advertising spend managed or administered by the Government Communication and Information Services."

- 4.7. We can find no such reference in Mr Maseko's statements which were provided to us. We assume this conclusion may be derived from a document with which we have not been furnished. Kindly provide us with such documentation or further statement, if it exists.

Annexure B

- 4.8. Our reading of the statement marked as Annexure B is that it does not refer to our client at all. In what way does the Commission therefore conclude or consider it to constitute evidence that implicates or may implicate President Zuma?
- 4.9. In paragraph 6 of Annexure B reference is made to complaints by other Heads of Department, the nature of which is not specified. We request the precise nature of the alleged complaints, the identities of the complainants and whether such complaints implicate President Zuma in unlawful conduct as alleged. If so, we request the relevant particulars or documentation in this regard.

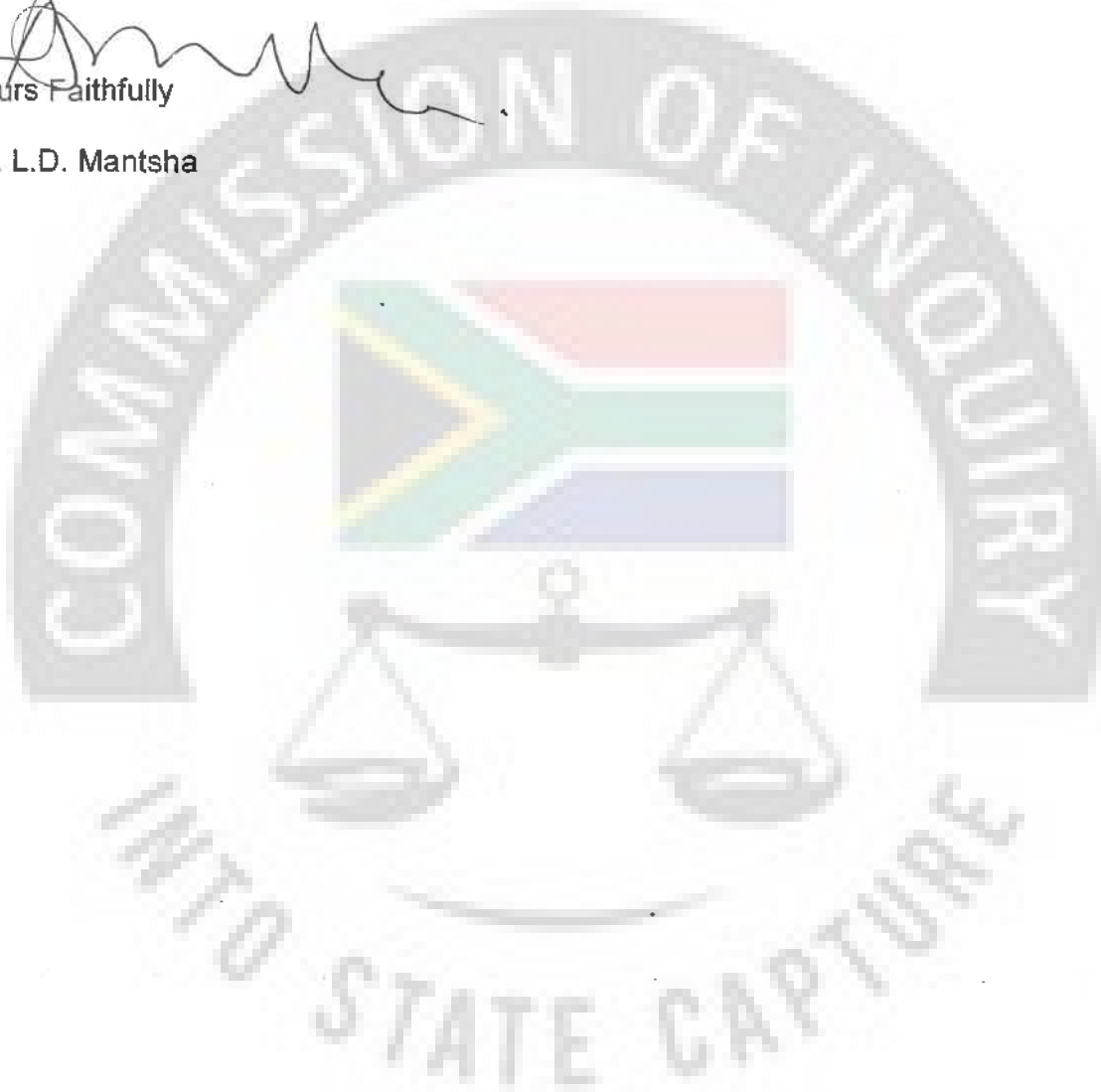


5. We await your urgent response to the above enquiries, after which we will advise the Commission of our client's response to the notices.

Our client's rights are reserved in this regard.


Yours Faithfully

Mr. L.D. Mantsha



24



ATTORNEYS AT LAW

2 Protea Road, Corner Riley, Bedfordview, 2008 Tel: (011) 450 2284/1641 Fax : (011) 450 1566
PO BOX 51238, Marshalltown, 2107 Email Address: info@mabundalaw.co.za DOCEX 424 JHB

16 August 2018

MR LD MANTSHA
LUGISANI MANTSHA ATTORNEYS
1ST FLOOR
BURNSIDE ISLAND
BLOCK 6
410 JAN SMUTS AVENUE
CRAIGHALL JOHANNESBURG

BY EMAIL: info@lugisanimantshaattorneys.co.za

Dear Mr Mantsha

IN RE: MS VYTJIE MENTOR/MR. JACOB ZUMA

1. We refer to the above matter.
2. We are in receipt of your letter dated 15 August 2018, contents of which have been noted.
3. We are forwarding same to our client and shall revert back to you immediately.

Warm Regards

Mabunda Incorporated


PB MABUNDA

Director: **Pritzman Busani Mabunda:** B Proc (UDW), LLB (Wits), LL.M (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip In Criminal Justice and Forensic Auditing (RAU),
Certificate In Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: **Dewald Leonard Viljoen:** B Proc (RAU), LL.M (International Law) (UJ); **S'fiso Molongoana:** LLB (UNIZULU);
David Matome Mogale: B Proc (VISTA).

info

From: Busani Mabunda <busani@mabundainc.com>
Sent: Thursday, 16 August 2018 7:13 PM
To: Lugisani Mantsha Attorneys; S'fiso Molongoana
Subject: RE: REPLY TO NOTICE IN TERMS OF RULE 3.3 OF THE RULES OF THE COMMISSION - MASEKO ALLEGATIONS
Attachments: Letter to Mr Mantsha 16 August 2018 (Mr Maseko).pdf

Dear Mr Mantsha

Enclosed herewith please find for your kind attention.

Kind Regards



Busani Mabunda – Director

MABUNDA INCORPORATED

Address: 2 Protea Road, Corner Riley, Bedfordview, 2008
 PO BOX 61238, Marshalltown, 2107
 DOCEX 424, JHB

Tel: (011) 450 1641/2284

Fax: 011 450 1566

Email: busani@mabundainc.co.za

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From: Lugisani Mantsha Attorneys <info@lugisanimantshaattorneys.co.za>
Sent: Thursday, 16 August 2018 6:25 PM
To: S'fiso Molongoana <sifiso.molongoana@mabundainc.com>
Cc: Busani Mabunda <busani@mabundainc.com>
Subject: REPLY TO NOTICE IN TERMS OF RULE 3.3 OF THE RULES OF THE COMMISSION - MASEKO ALLEGATIONS

Dear Sir,

Attached please find a letter for your urgent attention.

Regards
 Yvonne

26



ATTORNEYS AT LAW

2 Protea Road, Corner Riley, Bedfordview, 2008 Tel: (011) 450 2284/1641 Fax : (011) 450 1566
PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

16 August 2018

MR LD MANTSHA
LUGISANI MANTSHA ATTORNEYS
1ST FLOOR
BURNSIDE ISLAND
BLOCK 6
410 JAN SMUTS AVENUE
CRAIGHALL JOHANNESBURG

BY EMAIL: info@lugisanimantshaattorneys.co.za

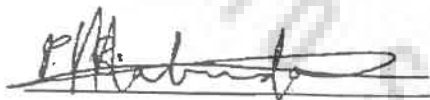
Dear Mr Mantsha

IN RE: MR THEMBA MVELI JAMES MASEKO//MR. JACOB ZUMA

1. We refer to the above matter.
2. We are in receipt of your letter dated 15 August 2018, contents of which have been noted.
3. We are forwarding same to our client and shall revert back to you immediately.

Warm Regards

Mabunda Incorporated


PB MABUNDA

Director: Pritzman Busani Mabunda: B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: Dewald Leonard Viljoen: B Proc (RAU), LLM (International Law) (UJ); S'fiso Malongoana: LLB (UNIZULU);
David Matome Mogale: B Proc (VISTA).

27



2 Protea Road, Corner Riley, Bedfordview, 2008 Tel: (011) 450 2284/1641 Fax : (011) 450 1566
PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

17 August 2018

Mr Jacob Gedleyihlekisa Zuma
C/o Lugisani Mantsha Attorneys
First floor, Burnside Island
Block 6
410 Jan Smuts Avenue
Craighall
Johannesburg

Per E-mail: info@lugisanimantshaattorneys.co.za

Cc: dan@lugisanimantshaattorneys.co.za

Attention: Mr L.D Mantsha

RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE
CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING
ORGANS OF STATE/ MS VYTIE MENTOR

Dear Mr Mantsha

1. We refer to your letter dated Thursday, 16 August 2018 and our subsequent letter to yourselves on an even date, wherein we undertook to revert back to your good selves.
2. We confirm that we have now obtained instructions from our client who has instructed us to respond as follows:
 - 2.1. In terms of rule 3.3 notice, we draw your attention to the privileges which your client may exercise insofar as your client may wish to debate, contest or challenge the version of Ms Mentor. Your client is invited to prepare and send a sworn statement in terms of the rules within 14 days of receipt of notices.

Director: **Pritzman Busani Mabunda**: B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
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David Matome Mogale: B Proc (VISTA).



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PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

2.2. Furthermore, your client is at liberty to make an application to the Chairman of the Commission to cross examine Ms Mentor on such matters as he takes issue with her version.

2.3. You are reminded that the Commission will commence with the hearings on Monday, the 20th August 2018 and the evidence of Ms Mentor will as things stand proceed on Monday, the 27th August 2018.

2.4. In conclusion, you are urged to feel free to contact us for any issue of clarification before or during the proceedings commencing on Monday.

Warm regards

Mabunda Incorporated

Mr PB Mabunda

Director: **Pritzman Busani Mabunda**: B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: **Dewald Leonard Viljoen**: B Proc (RAU), LLM (International Law) (UJ), **Sifiso Molongoana**: LLB (UNIZULU);
David Matome Mogale: B Proc (VISTA).

info

From: Busani Mabunda <busani@mabundainc.com>
Sent: Friday, 17 August 2018 9:20 PM
To: Lugisani Mantsha Attorneys
Cc: dan@lugisanimantshaattorneys.co.za
Subject: JUDICAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE.

Attachments: Letter to Mr Mantsha Notice 3.3 Ms. Phumla Williams -Mr. JG Zuma 17 August 2018.pdf; Notoce in terms of Rule 3.3 Ms. Phumla Williams-Mr. Jacob G Zuma.pdf

Good Day Mr Mantsha,

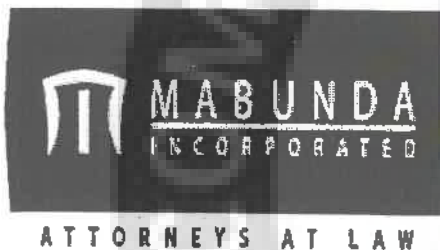
We refer to the above matter.

We annex hereto:

- 1.A letter for your attention.
- 2.A notice in terms of Rule 3.3 of the Commission rules.

We await to hear from you.

Kind Regards



Busani Mabunda – Director

MABUNDA INCORPORATED

Address: 2 Protea Road, Corner Riley, Bedfordview, 2008
 PO BOX 61238, Marshalltown, 2107
 DOCEX 424, JHB

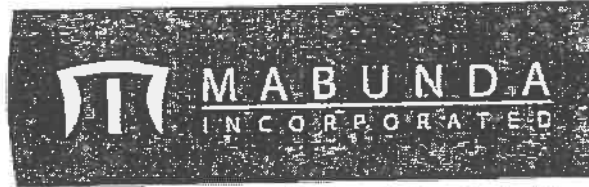
Tel: (011) 450 1641/2284

Fax: 011 450 1566

Email: busani@mabundainc.co.za

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2 Protea Road, Corner Riley, Bedfordview, 2008 Tel: (011) 450 2284/1641 Fax : (011) 450 1566
PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

17 August 2018

Mr. Jacob Gedleyihlekisa Zuma
C/o Luginani Mantsha Attorneys
First Floor, Burnside island
Block 6
410 Jan Smuts Avenue
Craigihall
Johannesburg

BY EMAIL: info@luginanimantshaattorneys.co.za
Cc: dan@luginanimantshaattorneys.co.za

Dear Mr. L.D Mantsha

**IN RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE
CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS
OF STATE: MS. PHUMLA WILLIAMS/MR. JACOB G ZUMA**

1. We refer to the above matter.
2. We confirm that you are the Attorney of record for Mr. Jacob Gedleyihlekisa Zuma
3. We email herewith a notice in terms of rule 3.3 of the Commission rules and a statement attached hereto to yourselves on behalf of your client.
4. We look forward to your client's co-operation with the Commission.

Warm Regards

Mabunda Incorporated


PB MABUNDA

Director: **Pritzman Busani Mabunda:** B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
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Assisted by: **Dewald Leonard Viljoen:** B Proc (RAU), LLM (International Law) (UJ); **S'fiso Molongoana:** LLB (UNIZULU);
David Matome Mogale: B Proc (VISTA).

info

From: Busani Mabunda <busani@mabundainc.com>
Sent: Friday, 17 August 2018 9:35 PM
To: Lugisani Mantsha Attorneys; S'fiso Molongoana
Cc: dan@lugisanimantshaattorneys.co.za
Subject: RE: REPLY TO NOTICE IN TERMS OF RULE 3.3 OF THE RULES OF THE COMMISSION - MASEKO ALLEGATIONS
Attachments: Letter to Mr Mantsha Mr. T Maseko Evidence Bundle 17 august 2018.pdf; Evidence Bundle - Mr Themba Maseko.pdf

Dear Mr Mantsha

Enclosed herewith please find for your kind attention.

Kind Regards



Busani Mabunda – Director

MABUNDA INCORPORATED

Address: 2 Protea Road, Corner Riley, Bedfordview, 2008
 PO BOX 61238, Marshalltown, 2107
 DOCEX 424, JHB
Tel: (011) 450 1641/2284
Fax: 011 450 1566
Email: busani@mabundainc.co.za

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From: Lugisani Mantsha Attorneys <info@lugisanimantshaattorneys.co.za>
Sent: Thursday, 16 August 2018 6:25 PM
To: S'fiso Molongoana <sifiso.molongoana@mabundainc.com>
Cc: Busani Mabunda <busani@mabundainc.com>
Subject: REPLY TO NOTICE IN TERMS OF RULE 3.3 OF THE RULES OF THE COMMISSION - MASEKO ALLEGATIONS

Dear Sir,

Attached please find a letter for your urgent attention.

Regards
 Yvonne



ATTORNEYS AT LAW

2 Protea Road, Corner Riley, Bedfordview, 2008 Tel: (011) 450 2284/1641 Fax : (011) 450 1566
PO BOX 51238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

17 August 2018

Mr Jacob Gedleyihlekisa Zuma
C/o Lugisani Mantsha Attorneys
First floor, Burnside Island
Block 6
410 Jan Smuts Avenue
Craigshall
Johannesburg

Per E-mail: info@lugisanimantshaattorneys.co.za

Cc: dan@lugisanimantshaattorneys.co.za

Attention: Mr LD Mantsha

**RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE
CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING
ORGANS OF STATE/MR THEMBA MASEKO**

Dear Mr Mantsha

1. We refer to your letter dated Thursday, 16 August 2018 and our subsequent letter to yourselves on an even date, wherein we undertook to revert back to your good selves.
2. We confirm that we have now obtained instructions from our client who has instructed us to respond as follows:
 - 2.1. In terms of rule 3.3 notice, we draw your attention to the privileges which your client may exercise insofar as your client may wish to debate, contest or challenge the version of Mr Maseko. Your client is invited to prepare and send a sworn statement in terms of the rules within 14 days of receipt of notice.

Director: **Pritzman Busani Mabunda:** B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
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Assisted by: **Dewald Leonard Viljoen:** B Proc (RAU), LLM (International Law) (UJ); **S'fiso Motongoana:** LLB (UNIZULU),
David Matome Mogale: B Proc (VISTA).



ATTORNEYS AT LAW

2 Protea Road, Corner Riley, Bedfordview, 2006 Tel: (011) 450 2284/1641 Fax : (011) 450 1566
PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

- 2.2. Furthermore, your client is at liberty to make an application to the Chairman of the Commission to cross examine Mr Maseko on such matters as he takes issue with his version.
- 2.3. You are reminded that the Commission will commence with the hearings on Monday, the 20th August 2018 and the evidence of Mr Maseko will as things stand proceed on Friday, the 31st August 2018.
- 2.4. We wish to assure that the Commission has not drawn any conclusions of fact or law arising out of Mr Maseko's evidence.
- 2.5. Any conclusions raised in Mr Maseko's statement will be made by the Chairman of the Commission.
- 2.6. Reference to 2.5 above will equally apply having had regard to client's version, if any and any supporting evidence that your client may have.
- 2.7. Finally, the Commission has prepared the bundle of documents which will be canvassed in the presentation of Mr Maseko's evidence. A copy of the bundle is annexed hereto for the ease of your reference.
- 2.8. In conclusion, you are urged to feel free to contact us for any issue of clarification before or during the proceedings commencing on Monday, the 20th August 2018.

Warm Regards

Mabunda Incorporated

Mr PB Mabunda

Director: **Pritzman Busani Mabunda**: B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP), Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU), Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: **Dewald Leonard Viljoen**: B Proc (RAU), LLM (International Law) (UJ), **S'iso Molongoana**: LLB (UNIZULU); **David Matome Mogale**: B Proc (VISTA).

Lugisani Mantsha Attorneys

From: Busani Mabunda <busani@mabundainc.com>
Sent: Tuesday, August 21, 2018 11:53 PM
To: Lugisani Mantsha Attorneys
Cc: dan@lugisanimantshaattorneys.co.za
Subject: IN RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE/ MR JACOB ZUMA

Attachments: Letter to Mr LD Mantsha 21 August 2018.pdf

Dear Mr Mantsha

1. We refer to the above matter.
2. Enclosed herewith please find for your kind attention.
3. Kindly confirm receipt of same in writing.

Kind Regards



Busani Mabunda – Director

MABUNDA INCORPORATED

Address: 2 Protea Road, Corner Riley, Bedfordview, 2008
 PO BOX 61238, Marshalltown, 2107
 DOCEX 424, JHB

Tel: (011) 450 1641/2284

Fax: 011 450 1566

Email: busani@mabundainc.co.za

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ATTORNEYS AT LAW

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PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

21 August 2018

LUGISANI MANTSHA ATTORNEYS

First floor, Burnside Island
Block 6
410 Jan Smuts Avenue
Craighall
Johannesburg

Per E-mail: info@lugisanimantshaattorneys.co.za

Cc: dan@lugisanimantshaattorneys.co.za

Attention: Mr L.D Mantsha

**IN RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE/
MR JACOB ZUMA**

Dear Mr Mantsha

1. Further to our correspondence to yourselves on Friday, the 17th August 2018, I have been instructed to forward this further correspondence relating to the issues raised.
2. **Ad Para 3.1**
 - 2.1. The allegation is made on paragraph 21.
 - 2.2. The Commission is not in possession of the record.
3. **Ad Para 3.2**
 - 3.1. No.
4. **Ad Para 3.3**
 - 4.1. Yes. As she is no longer an MP she does not have access to her computer and does not have these documents.

Director: **Pritzman Busani Mabunda**: B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: **Dewald Leonard Viljoen**: B Proc (RAU), LLM (International Law) (UJ); **S'fiso Molongoana**: LLB (UNIZULU);
David Matome Mogale: B Proc (VISTA), **Hlengiwe Pamela Goba**: LLB (UP).



ATTORNEYS AT LAW

2 Protea Road, Corner Riley, Bedfordview, 2008 Tel: (011) 450 2284/1641 Fax : (011) 450 1566
PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

5. Ad Para 3.4

- 5.1. The notice neither suggests nor concludes anything.
- 5.2. The notice merely informs Mr. Zuma of allegations made against him by Ms Mentor which may implicate him in impropriety.

6. Ad Para 4.5 (sic 3.5)

- 6.1. The Commission does not make any allegations.
- 6.2. To the extent that Ms Mentor suggests that former President had the power to remove her from the position of Chairperson of the Portfolio Committee, this is a matter that must be canvassed with Ms Mentor.

7. Ad Para 4.6 (sic 3.6)

- 7.1. Ms Mentor, and not the Commission, advances the reasons for her removal.
- 7.2. The Commission does not make any contentions on any aspect canvassed in Ms Mentor's statement.
- 7.3. Please note that the Commission accepts the statement of the witness as furnished. It has no knowledge of the of the facts set out in the statement and is thus not in a position to provide any elucidation.

8. Ad Para 4.7 (sic 3.7)

- 8.1. The Commission has not been furnished with the statements of the persons referred to.

9. Ad Para 5.1 (sic) read with Para 4

- 9.1. The Commission is not in possession of a statement from Mr Ajay Gupta.
- 9.2. The Commission will not explain or expound on a witness's allegations.

10. Ad Para 5.2 (sic)

- 10.1. The Notice issued to Mr. Zuma by the Commission does no more than advise him of allegations made against him by a witness to the Commission that may implicate him.
- 10.2. The Commission did not present the statement as a form of evidence.

11. Ad Para 5.3

Director: **Pritzman Busani Mabunda**: B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
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Assisted by: **Dewald Leonard Viljoen**: B Proc (RAU), LLM (International Law) (UJ); **S'fiso Molongoana**: LLB (UNIZULU);
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- 11.1. The Commission has made no allegations.
- 11.2. Mr Zuma is invited to address, should he find it necessary, the allegations against him made by Ms Mentor in her statement.
- 11.3. The Commission is neither in a position nor mandated to advance a basis for the allegations made by Ms Mentor in her statement.

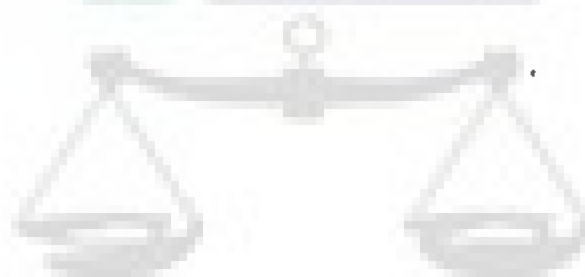
12. Ad Para 5.4

- 12.1. The Commission has made no allegations.

Yours Faithfully

Mabunda Incorporated

Mr PB Mabunda



Director: **Pritzman Busani Mabunda**: B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
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21 August 2018

LUGISANI MANTSHA ATTORNEYS
First floor, Burnside Island
Block 6
410 Jan Smuts Avenue
Craighall
Johannesburg

By email: info@lugisanimantshaattorneys.co.za
Cc: dan@lugisanimantshaattorneys.co.za

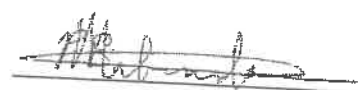
Attention: Mr L.D Mantsha

RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE:
MR ZUMA.

1. We refer to the above matter.
2. Kindly receive herewith the bundle of documents as per our client's undertaking.
3. We further confirm that you are already in possession of Mr Maseko's bundle.
4. We trust that you find same to be in order.

Yours Faithfully

Mabunda Incorporated

A handwritten signature in black ink, appearing to read 'PB Mabunda', is written over a horizontal line.

Mr PB Mabunda

Director: **Pritzman Busani Mabunda**: B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: **Dewald Leonard Viljoen**: B Proc (RAU), LLM (International Law) (UJ); **S'fiso Molongoana**: LLB (UNIZULU);
David Matome Mogale: B Proc (VISTA), **Hlengiwe Pamela Goba**: LLB (UP).

39

Lugisani Mantsha Attorneys

From: Lugisani Mantsha Attorneys <info@lugisanimantshaattorneys.co.za>
Sent: Wednesday, August 22, 2018 2:04 PM
To: 'Busani Mabunda'
Subject: IN RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE/ MR JACOB ZUMA

Dear Sir,

We refer to the above matter and acknowledge receipt of your letter dated 21 August 2018.

Regards
 Yvonne

From: Busani Mabunda <busani@mabundainc.com>
Sent: Tuesday, August 21, 2018 11:53 PM
To: Lugisani Mantsha Attorneys <info@lugisanimantshaattorneys.co.za>
Cc: dan@lugisanimantshaattorneys.co.za
Subject: IN RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE/ MR JACOB ZUMA

Dear Mr Mantsha

1. We refer to the above matter.
2. Enclosed herewith please find for your kind attention.
3. Kindly confirm receipt of same in writing.

Kind Regards



ATTORNEYS AT LAW

Busani Mabunda – Director

MABUNDA INCORPORATED

Address: 2 Protea Road, Corner Riley, Bedfordview, 2008
 PO BOX 61238, Marshalltown, 2107
 DOCEX 424, JHB

Tel: (011) 450 1641/2284

Fax: 011 450 1566

Email: busani@mabundainc.co.za

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info

From: Busani Mabunda <busani@mabundainc.com>
Sent: Wednesday, 22 August 2018 12:20 AM
To: Lugisani Mantsha Attorneys
Cc: dan@lugisanimantshaattorneys.co.za
Subject: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MR ZUMA.

Dear Mr Mantsha

1. We refer to the above matter
2. Please click [here](#) to download eleven (documents) for your records.
3. The link expires on the 24th August 2018.
4. Please confirm receipt of same in writing.

Kind Regards



Busani Mabunda – Director

MABUNDA INCORPORATED

Address: 2 Protea Road, Corner Riley, Bedfordview, 2008
PO BOX 61238, Marshalltown, 2107
DOCEX 424, JHB
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PO BOX 61238, Marshalltown, 2107 Email Address: info@mabunda-inc.co.za DOCEX 424 JHB

22 August 2018

MR JACOB GEDLEYIHLEKISA ZUMA
c/o
MR LD MANTSHA
LUGISANI MANTSHA ATTORNEYS
1ST FLOOR
BURNSIDE ISLAND
BLOCK 6
410 JAN SMUTS AVENUE
CRAIGHALL JOHANNESBURG

BY EMAIL: info@lugisanimantshaattorneys.co.za
: dan@lugisanimantshaattorneys.co.za

Dear Mr Mantsha,

**IN RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE
CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS
OF STATE: MS. BRABARA HOGAN/MR. JACOB G ZUMA**

1. We refer to the above matter.
2. We confirm that you are the Attorneys of record for Mr. Jacob Gedleyihlekisa Zuma.
3. We email herewith a notice in terms of rule 3.3 of the Commission rules and a statement attached hereto to yourselves on behalf of your client.
4. We look forward to your client's co-operation with the Commission.

Kind Regards

Mabunda Incorporated

PB MABUNDA

Director: **Pritman Susani Mabunda:** B Proc (UDW), LLB (Wits), LL.M (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
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Assisted by: **Dewald Leonard Viljoen:** B Proc (RAU), LL.M (International Law) (UJ); **S'iso Molongoana:** LLB (UNIZULU);
David Matome Mogale: B Proc (VISTA), **Hengiwe Pamela Goba:** LLB (UP).

Lugisani Mantsha Attorneys

From: Lugisani Mantsha Attorneys <info@lugisanimantshaattorneys.co.za>
Sent: Sunday, August 26, 2018 5:26 PM
To: 'Busani Mabunda'
Subject: MS MENTOR
Attachments: letter to Mabunda Inc 25 Aug 2018 MENTOR.docx

Importance: High

Dear Mr Mabunda

Enclose find the letter for your attention .

Regards
Yvonne



Lugisani Mantsha Attorneys

First Floor, Burnside Island, Block 6, 410 Jan Smuts Ave, Craighall, Johannesburg, RSA
Box 1127, Randburg, 2125

Tel No 011 791 0099
Fax No 011 791 0525
Email info@mantshaattorneys.co.za
Web www.mantshaattorneys.co.za



LUGISANI MANTSHA ATTORNEYS

First floor|Burnside Island |Block 6| 410 Jan Smuts Ave | Craighall | Johannesburg
Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: Info@lugisanimantshaattorneys.co.za |
Box 1127 | Randburg | 2125

Our Ref: Mr L D Mantsha LM0257/18/C

Attention : The Secretary of the Commission .
C/O MABUNDA INC
The Attorneys of record for the Commission

Per email: busani@mabundainc.com

Date: 24 August 2018

"PRIVATE AND CONFIDENTIAL"

"URGENT"

Dear Sir,

**IN RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE
CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING
ORGANS OF STATE: MS.M MENTOR / MR. JACOB G ZUMA**

We refer to the above matter .

We have noted your letter dated the 21 August 2018 which is meant to be a comprehensive reply to the list of questions and documents we have requested the Commission to provide to our Client as per our letter dated 15 August 2018 , more importantly to assist the chairperson of the Commission to separate falsified facts from the real facts , sadly your Client 's answer in our view is prejudicial to both the Chairperson of the Commission and our client .

Director: Lugisani Mantsha Bjuris, LLB
Lugisani Mantsha Incorporated Reg:2012/069234/21

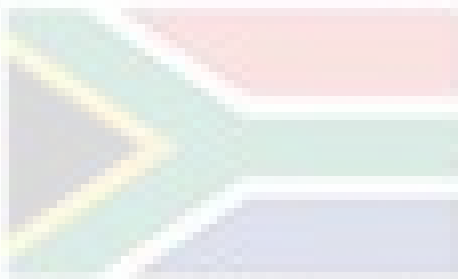
We have considered the transcript of the recorded testimony of Ms Mentor before the Public Protector as provided by your office, references is made by Ms Mentor in the said transcript of a report or reports she gave to the then Speaker of National Assembly Mr M Sisulu, Portfolio Committee of Public Enterprise and the then Secretary General of the ruling party Mr Gwede Mantashe in respect of her trip to China.

We have also noted on the bundle of Ms Mentor that the Commission had corresponded with a Government department or departments asking information and documents, we do not understand why the Commission is not asking about the letter or documentations from the office of the then Secretary General of the ruling party and the then Chief Whip of the ruling party in so far as the removal of Ms Mentor as a chairperson of the Portfolio Committee of Public Enterprise is concern.

Yours Faithfully

Mr L.D. Mantsha

Electronically sent and therefore not signed



info

From: Busani Mabunda <busani@mabundainc.com>
Sent: Sunday, 26 August 2018 8:52 PM
To: Lugisani Mantsha Attorneys
Subject: Re: MS MENTOR

Dear Mr Mantsha

I acknowledge receipt of your letter. I have forwarded same to client for response. I will revert back to you upon receipt of instructions.

Kind Regards



On 26 Aug 2018, at 17:26, Lugisani Mantsha Attorneys <info@lugisanimantshaattorneys.co.za> wrote:

Dear Mr Mabunda

Enclose find the letter for your attention .

Regards
Yvonne

<image001.png>

<letter to Mabunda Inc 25 Aug 2018 MENTOR.docx>

Lugisani Mantsha Attorneys

From: Lugisani Mantsha Attorneys <info@lugisanimantshaattorneys.co.za>
Sent: Sunday, August 26, 2018 9:00 PM
To: 'Busani Mabunda'
Subject: HOGAN
Attachments: Letter to Mabunda Inc 24 August 2018 hogan.docx

Importance: High

Dear Mr Mabunda

Kindly receive the enclose letter for your attention

Regards
Yvonne



Lugisani Mantsha Attorneys

TEL NO 011 791 0489
 FAX NO 011 791 0526
 Email info@lugisanimantshaattorneys.co.za
 Web www.lugisanimantshaattorneys.co.za

First Floor, Burnside Island, Block 5, 410 Jan Smuts Ave, Craighall, Johannesburg, RSA
 Box 1127, Randburg, 2125



LUGISANI MANTSHA ATTORNEYS

First floor | Burnside Island | Block 6 | 410 Jan Smuts Ave | Craighall | Johannesburg
Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: info@lugisanimantshaattorneys.co.za |
Box 1127 | Randburg | 2125

47

Our ref: LD Mantsha LM0273/18/J18

Att: Mr Busani Mabunda
C/O Mabunda Incorporated
Attorneys of record for the Commission
Per email: busani@mabundainc.com

24 August 2018.

"PRIVATE AND CONFIDENTIAL"
"URGENT"

Dear Sir,

**IN RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF
STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC
SECTOR INCLUDING ORGANS OF STATE: MS. BRABARA HOGAN/
MR. JACOB G ZUMA**

We acknowledge receipt of the notice in respect of Ms Hogan's statement. We are concerned that the Commission seemed not to be forthright in its communication with us and this is prejudicial to our client.

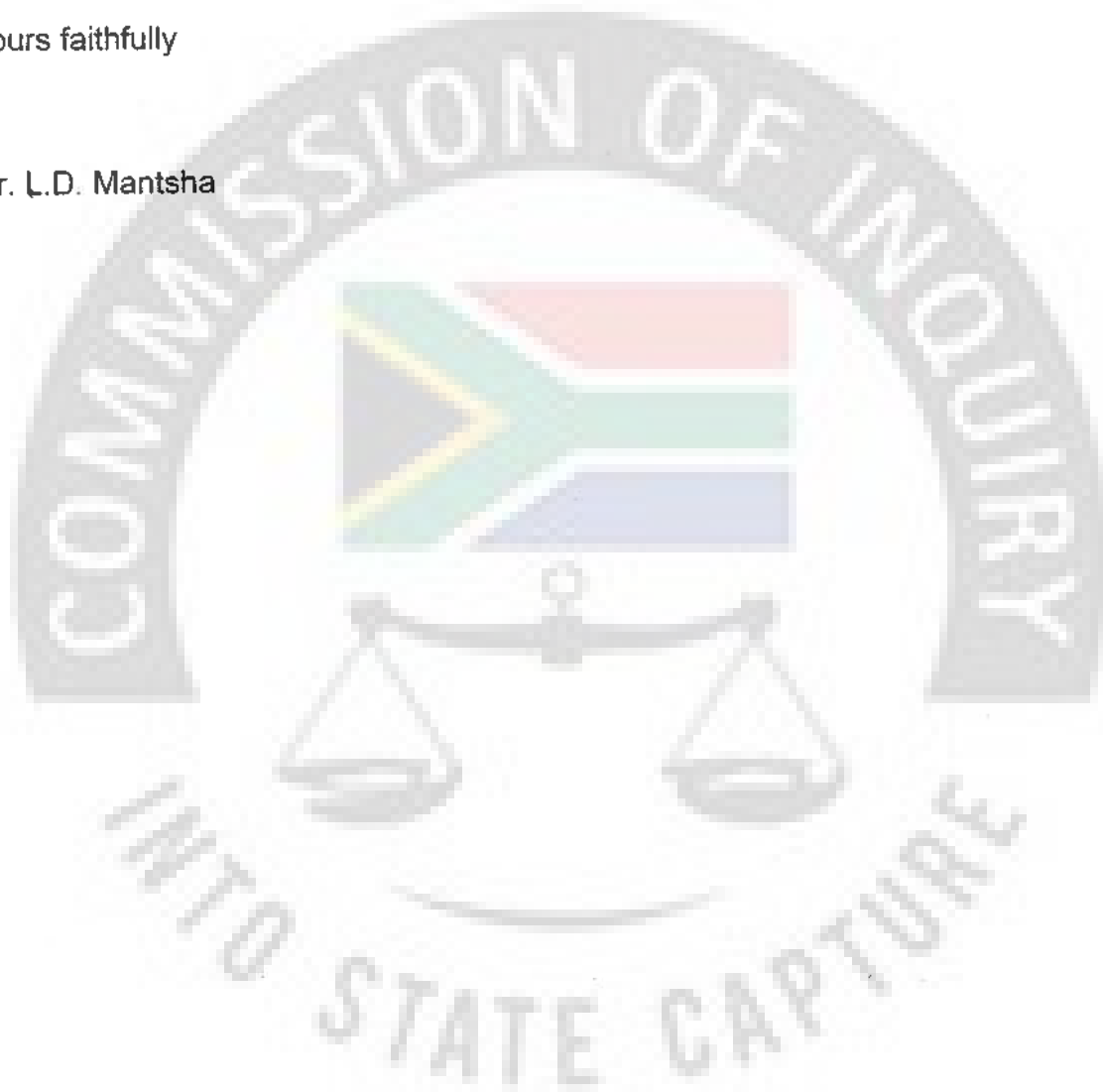
On the 20 August 2018, we enquired from evidence leaders or legal advisors of the commission as to whether the statements of Ms Mentor, Mr Maseko and Ms Williams constituted the totality of the notices in terms of rule 3.3 in respect of our client. The answer from the evidence leaders was yes, the statements of the three were all the statements due to our client in respect of what they termed phase one even though it

was indicated that we may still receive further statements in respect of what they termed Phase two .

We record our objection against the manner in your client is sending information selectively and timing its release in a prejudicial manner.

Yours faithfully

Mr. L.D. Mantsha



info

From: Busani Mabunda <busani@mabundainc.com>
Sent: Sunday, 26 August 2018 9:14 PM
To: Lugisani Mantsha Attorneys
Subject: Re: HOGAN

Dear Mr Mantsha

I acknowledge receipt of your letter. I am forwarding same to client for instructions. I will revert back to you upon receipt of instructions.

Kind Regards



On 26 Aug 2018, at 21:00, Lugisani Mantsha Attorneys <info@lugisanimantshaattorneys.co.za> wrote:

Dear Mr Mabunda

Kindly receive the enclose letter for your attention

Regards

Yvonne

<image001.png>

<Letter to Mabunda Inc 24 August 2018 hogan.docx>

info

From: Busani Mabunda <busani@mabundainc.com>
Sent: Monday, 27 August 2018 9:20 PM
To: Lugisani Mantsha Attorneys
Subject: Re: MS MENTOR

Dear Mr Mantsha

As you were present in the proceedings today, the Commission will be dealing with the issue of how to take the process forward with respect to those parties to the proceedings who have not yet filed their rule 3.4 notices among others. As you may be aware, your client falls under this category as things stand. There are other practitioners who will be meeting with the Legal team tomorrow to see if there may be an agreement tomorrow. As you may recall, the Chairman of the Commission will be making rulings on applications on Tuesday the 28th October 2018, I have been instructed in line with the Chairman's remarks, to invite you for engagement with the Legal team of the Commission to see if there may be no common understanding on taking the matter forward. We look forward to meeting you and your team in relation to the above before the hearings of the day.

Kind Regards



On 26 Aug 2018, at 17:26, Lugisani Mantsha Attorneys <info@lugisanimantshaattorneys.co.za> wrote:

Dear Mr Mabunda

Enclose find the letter for your attention .

Regards
Yvonne

<image001.png>

<letter to Mabunda Inc 25 Aug 2018 MENTOR.docx>

51

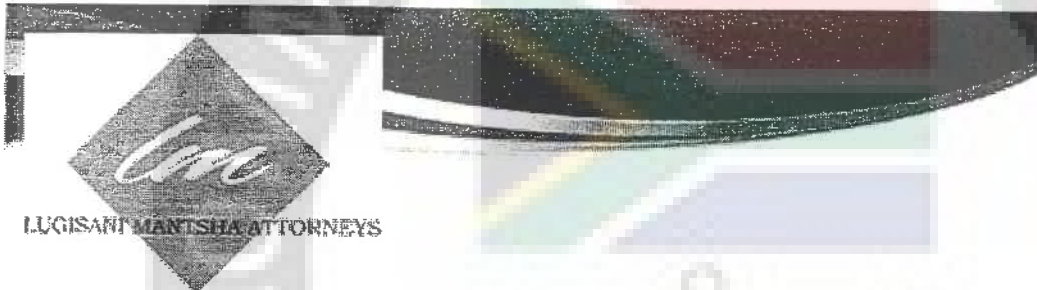
Lugisani Mantsha Attorneys

From: Lugisani Mantsha Attorneys <info@lugisanimantshaattorneys.co.za>
Sent: Friday, August 31, 2018 4:16 PM
To: 'Busani Mabunda'
Subject: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MR JACOB G ZUMA
Attachments: Letter to the Commission on State Capture.docx
Importance: High

Dear Sir,

Attached please find a letter for your urgent attention.

Regards
Yvonne



✉ info@lugisanimantshaattorneys.co.za ☎ 011 781 0099 🌐 www.lugisanimantshaattorneys.co.za

📍 410 Jan Smuts Ave Burnside Island Office Park Block G

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LUGISANI MANTSHA ATTORNEYS

First floor | Burnside Island | Block 6 | 410 Jan Smuts Ave | Craighall | Johannesburg
Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: Info@lugisanimantshaattorneys.co.za |
Box 1127 | Randburg | 2125 |

Our Ref: Mr L D Mantsha LM0257/18/C

Attention: The Secretary of the Commission

C/O MABUNDA INC

The Attorneys of record for the Commission

Per email: busani@mabundainc.com

Date: 31 August 2018

"PRIVATE AND CONFIDENTIAL"

"URGENT"

Dear Sir,

**RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE
CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR
INCLUDING ORGANS OF STATE: MR. JACOB G ZUMA**

1. We act on behalf of the former President Jacob Gedleyihlekisa Zuma ("former President Zuma") in the proceedings of the Judicial Commission of Inquiry into

Allegations of State Capture, Corruption and Fraud in the Public Sector including
Organs of State ("the Commission").

2. We specifically refer to the General Notices issued by the Commission to former President Zuma in terms of rule 3.3 of the Rules of Proceedings of the Commission ("the Notices"), all of which were issued on the basis that the contents of the statements attached thereto do or may implicate former President Zuma.
3. The Notices are in respect Ms Mabel Petronella Mentor ("Ms Mentor"), Mr Themba Mveli James Maseko ("Mr Maseko"), Ms Mirriam Phumla Williams ("Ms Williams") and Ms Barbara Hogan ("Ms Hogan"). The Notices were accompanied by statements of each of the above-mentioned persons.
4. We have consulted our client and have considered the said statements in order to determine whether they implicate or may implicate our client in the violation of the relevant statutes of the Republic of South Africa, being, *inter alia*, the Constitution of the Republic of South Africa, Act 108 of 1996 ("the Constitution"), Public Finance Management Act 1 of 1999 ("the PFMA"), Preferential Procurement Policy Framework Act 5 of 2000 "PPPFA"), Municipal Finance Management Act 56 of 2003, Prevention and Combating of Corrupt Activities Act 12 of 2004 ("PRECCA"), Prevention of Organised Crime Act 121 of 1998 ("POCA"), the Criminal Procedure Act 51 of 1977, relevant ethical codes, as well as relevant and applicable policies of government.

5. We are unable at this stage to comment on the phenomenon or offence referred to as "state capture" whose elements and/or existence or otherwise remain the subject of investigation by the Commission.
6. We are satisfied that nothing in the aforementioned witnesses' statements implicates or may implicate our client in the infringement of the aforementioned statutes, policies of government and relevant ethical codes.
7. We express our sincere appreciation for the opportunity afforded to us and our client to exercise his rights in terms of the rules of the Commission.

Yours faithfully

Mr L.D Mantsha

Electronically sent and therefore not signed

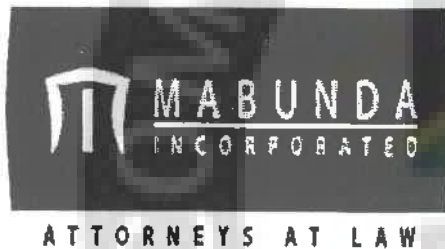
info

From: Busani Mabunda <busani@mabundainc.com>
Sent: Sunday, 09 September 2018 9:08 PM
To: Lugisani Mantsha Attorneys
Cc: dan@lugisanimantshaattorneys.co.za
Subject: IN RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE –: MS BARBARA HOGAN
Attachments: Letter to Mr LD Mantsha 9 September 2018.pdf

Dear Mr. Mantsha

1. Enclosed herewith please find for your kind attention.
2. Kindly confirm receipt of same in writing.

Kind Regards



Busani Mabunda – Director

MABUNDA INCORPORATED

Address: 2 Protea Road, Corner Riley, Bedfordview, 2008
PO BOX 61238, Marshalltown, 2107
DOCEX 424, JHB
Tel: (011) 450 1641/2284
Fax: 011 450 1566

Email: busani@mabundainc.co.za

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MABUNDA
INCORPORATED

ATTORNEYS AT LAW

2 Protea Road, Corner Riley, Bedfordview, 2008 Tel: (011) 450 2284/1641 Fax : (011) 450 1566
PO BOX 51238, Marshalltown, 2107 Email Address: info@mabunda-inc.co.za DOCEX 424 JHB

9 September 2018

LUGISANI MANTSHA ATTORNEYS

First floor, Burnside Island
Block 6
410 Jan Smuts Avenue
Craighall
Johannesburg

Dear Mr. Mantsha

**IN RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF
STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR
INCLUDING ORGANS OF STATE –: MS BARBARA HOGAN**

1. We refer to the above matter.
2. We confirm that the Evidence Leaders of the Commission will be leading Ms. Barbara Hogan on Wednesday the 12th September 2018.
3. This letter serves as confirmation of the above information as was sent to you via short message service (SMS) by the writer hereof.
4. We hope you will find the above to be in order.

Yours Faithfully

Director: **Pritzman Busani Mabunda**: B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN), MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: **Dewald Leonard Viljoen**: B Proc (RAU), LLM (International Law) (UJ); **S'fiso Molongoana**: LLB (UNIZULU);
David Matoma Mogale: B Proc (VISTA), **Hlengiwe Pamela Goba**: LLB (UP).



ATTORNEYS AT LAW

2 Protea Road, Corner Riley, Bedfordview, 2008 Tel: (011) 450 2284/1641 Fax : (011) 450 1566
PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

Mabunda Incorporated

PB Mabunda

Per E-mail: info@lugisanimantshaattorneys.co.za

Cc: dan@lugisanimantshaattorneys.co.za



Director: **Pritzman Busani Mabunda**: B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: **Dewald Leonard Viljoen**: B Proc (RAU), LLM (International Law) (UJ); **S'fiso Molongoana**: LLB (UNIZULU);
David Matome Mogale: B Proc (VISTA), **Hfengiwe Pamela Goba**: LLB (UP).

Lugisani Mantsha Attorneys

From: Gloria Thagane <oumat@commissionsc.org.za>
Sent: Wednesday, September 12, 2018 2:11 PM
To: info@lugisanimantshaattorneys.co.za
Cc: nick.robb@webberwentzel.com; 'Dr Khotso De Wee'; oumat@commissionsc.org.za
Subject: THE STATE CAPTURE COMMISSION OF INQUIRY
Attachments: SKM_C65818091213420.pdf

Importance: High

Dear Sir

Kindly receive the attached notice for your urgent attention.

Warm regards

Gloria Thagane (on behalf of Dr Khotso De Wee)





2nd floor, Hillside House
17 Empire Road, Parktown
Johannesburg
2193
Tel: (010) 214-0651
Email: inquiries@sastatecapture.org.za
Website: www.sastatecapture.org.za

JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE

12 September 2018

Your ref: Mr L D Mantsha

Email: info@lugisanimantshaattorneys.co.za

Lugisani Mantsha Attorneys
First Floor
Burnside Island
Block 6
410, Jan Smuts Avenue
Craighall
Johannesburg

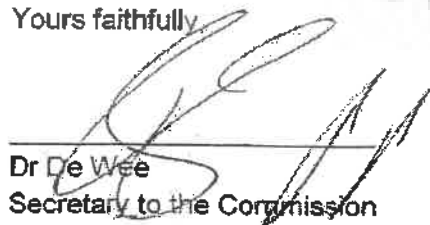
Dear Sir,

Re: The State Capture Commission of Inquiry

The Commission is reconvening tomorrow at 10:00am. The Chairman shall be making an announcement at the commencement of proceedings which has a bearing upon your client, Mr Jacob Zuma.

In the circumstances, you are invited to attend the proceedings in order to take note of the announcement.

Yours faithfully


Dr De Wee
Secretary to the Commission



MABUNDA
INCORPORATED

ATTORNEYS AT LAW

2 Protea Road, Corner Riley, Bedfordview, 2008 Tel: (011) 450 2284/1641 Fax : (011) 450 1566
PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

08 October 2018

LUGISANI MANTSHA ATTORNEYS

First floor, Burnside Island

Block 6

410 Jan Smuts Avenue

Craighall

Johannesburg

Dear Mr. Mantsha

IN RE: NOTICE IN TERMS OF RULE 3.3 BY MS BARBARA HOGAN

1. We refer to the above matter.
2. Kindly be advised that Ms. Barbara Hogan will be appearing before the Commission on Wednesday the 10th October 2018.
3. We confirm that your client was through you served a notice in terms of rule 3.3, dated 22 August 2018 in which he was implicated by Ms. Hogan.
4. Please expect to receive a formal notice in terms of rule 3.3 based on this statement on Tuesday the 9th October 2018.
5. Should you have any queries regarding the above, please do not hesitate to contact the writer hereof.

Yours Faithfully

Director: **Pritzman Busani Mabunda**: B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: **Dewald Leonard Viljoen**: B Proc (RAU), LLM (International Law) (UJ); **S'fiso Molongoana**: LLB (UNIZULU);
LLM (Labour Law) UNISA; **David Matome Mogale**: B Proc (VISTA), **Hlengiwe Pamela Goba**: LLB (UP).

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ATTORNEYS AT LAW

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PO BOX 81238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

Mabunda Incorporated

PB Mabunda

Per E-mail: info@lugisanimantshaattorneys.co.za

Cc: dan@lugisanimantshaattorneys.co.za



Director: **Pritzman Busani Mabunda:** B Proc (UDW), LLB (Wits), LL.M (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
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Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: **Dewald Leonard Viljoen:** B Proc (RAU), LL.M (International Law) (UJ); **S'tiso Molongoana:** LLB (UNIZULU);
LL.M (Labour Law) UNISA; **David Matome Mogale:** B Proc (VISTA), **Hlengiwe Pamela Goba:** LLB (UP).

Lugisani Mantsha Attorneys

From: Lugisani Mantsha Attorneys <info@lugisanimantshaattorneys.co.za>
Sent: Tuesday, October 9, 2018 11:36 AM
To: 'Busani Mabunda'
Subject: IN RE: NOTICE IN TERMS OF RULE 3.3 BY MS BARBARA HOGAN
Attachments: letter to Mabunda Inc 09 Oct 2018.docx
Importance: High

Dear Sir,

Attached please find a letter for your urgent attention.

Regards

Mr L D Mantsha



LUGISANI MANTSHA ATTORNEYS

✉ info@lugisanimantshaattorneys.co.za ☎ 011 721 0055 🌐 www.lugisanimantshaattorneys.co.za

📍 410 Jan Smuts Ave Sunningdale White Park Block 6

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LUGISANI MANTSHA ATTORNEYS

First floor | Burnside Island | Block 6 | 410 Jan Smuts Ave | Craighall | Johannesburg
Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: info@lugisanimantshaattorneys.co.za |
Box 1127 | Randburg | 2125

Our Ref: Mr L D Mantsha LM0257/18/C

Attention: The Secretary of the Commission
C/O MABUNDA INC
The Attorneys of record for the Commission

Per email: busani@mabundainc.com

Date: 09 October 2018

"PRIVATE AND CONFIDENTIAL"
"URGENT"

Dear Sir,

**IN RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE
CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING
ORGANS OF STATE: MS BARBARA HOGAN**

We refer to the above and your letter dated the 08 October 2018.

May you kindly confirm with us at what time Ms Barbara Hogan will be giving the evidence tomorrow, Wednesday the 10 October 2018.

We record our thanks in anticipation.

Yours Faithfully

Mr L.D. Mantsha

Electronically sent and therefore not signed

Director: Lugisani Mantsha Bjuris, LLB
Lugisani Mantsha Incorporated Reg:2012/069234/21

info

From: Busani Mabunda <busani@mabundainc.com>
Sent: Tuesday, 09 October 2018 1:25 PM
To: Lugisani Mantsha Attorneys
Subject: Re: IN RE: NOTICE IN TERMS OF RULE 3.3 BY MS BARBARA HOGAN

Dear Mr Mantsha

The evidence will be given at 10am.

Kind Regards



On 09 Oct 2018, at 11:36, Lugisani Mantsha Attorneys <info@lugisanimantshaattorneys.co.za> wrote:

Dear Sir,

Attached please find a letter for your urgent attention.

Regards

Mr L D Mantsha

<image001.png>

<letter to Mabunda Inc 09 Oct 2018.docx>

Lugisani Mantsha Attorneys

From: Lugisani Mantsha Attorneys <info@lugisanimantshaattorneys.co.za>
Sent: Thursday, October 11, 2018 2:05 PM
To: 'Busani Mabunda'
Subject: INVITATION TO THE FORMER PRESIDENT J.G ZUMA
Attachments: letter to Mabunda Inc 11 October 2018.pdf

Dear Sir,

Attached please find a letter for your attention.

Kind regards

Yvonne



LUGISANI MANTSHA ATTORNEYS

✉ info@lugisanimantshaattorneys.co.za ☎ 011 781 0690 🌐 www.lugisanimantshaattorneys.co.za

📍 #10 Jan Smuts Ave Burnside Island Office Park Block 6

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First floor | Burnside Island | Block 6 | 410 Jan Smuts Ave | Craighall | Johannesburg
Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: info@lugisanimantshaattorneys.co.za |
Box 1127 | Randburg | 2125 |

Our Ref: Mr L D Mantsha LM0257/18/C

Attention: The Secretary of the Commission
Dr K De Wee
C/O MABUNDA INC
The Attorneys of record for the Commission

Per email: busani@mabundainc.com

Date: 11 October 2018

"PRIVATE AND CONFIDENTIAL"
"URGENT"

Dear Sir,

RE: INVITATION TO THE FORMER PRESIDENT J.G ZUMA

1. We refer to the invitation extended to the former President by Chairperson of the Commission.
2. The former President is attending to the matter and has written to the Presidency through his lawyers requesting to be provided with the necessary records so that he can assist the Commission.
3. We hope to receive such information from Presidency in the coming weeks and thereafter we shall promptly communicate with the Commission.

We record our thanks in anticipation.

Yours Faithfully

Mr L.D. Mantsha

Electronically sent and therefore not signed

Director: Lugisani Mantsha Bjuris, LLB
Lugisani Mantsha Incorporated Reg:2012/069234/21

Lugisani Mantsha Attorneys

From: Lugisani Mantsha Attorneys <info@lugisanimantshaattorneys.co.za>
Sent: Friday, October 12, 2018 3:14 PM
To: 'Busani Mabunda'
Subject: MS B HOGAN NEW STATEMENT OF EVIDENCE
Attachments: letter to Mabunda Inc12 October 2018 Ms B Hogan.pdf

Importance: High

Dear Sir,

Attached please find a letter for your attention.

Kindly acknowledge receipt.

Regards
Yvonne



✉ info@lugisanimantshaattorneys.co.za ☎ 011 751 0060 🌐 www.lugisanimantshaattorneys.co.za

📍 410 Jan Smuts Ave Burnside Island Office Park Block G

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LUGISANI MANTSHA ATTORNEYS

First floor | Burnside Island | Block 6 | 410 Jan Smuts Ave | Craighall | Johannesburg
Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: info@lugisanimantshaattorneys.co.za |
Box 1127 | Randburg | 2125 |

Our Ref: Mr L D Mantsha LM0257/18/C

Attention: The Secretary of the Commission
Dr K De Wee
C/O MABUNDA INC
The Attorneys of record for the Commission

Per email: busani@mabundainc.com

Date: 12 October 2018



"PRIVATE AND CONFIDENTIAL"
"URGENT"

Dear Sir,

RE: MS B HOGAN NEW STATEMENT OF EVIDENCE

1. We refer to the above matter and complaints we have raised on behalf of our client during the Commission of Inquiry sitting on the 10 October 2018.
2. We request you to provide us with the new statement of Ms B Hogan.

Yours Faithfully

Mr L.D. Mantsha

Electronically sent and therefore not signed

Director: Lugisani Mantsha Bjuris, LLB
Lugisani Mantsha Incorporated Reg:2012/069234/21



ATTORNEYS AT LAW

2 Protea Road, Corner Riley, Bedfordview, 2008 Tel: (011) 450 2284/1641 Fax : (011) 450 1566
PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

12 October 2018

Mr L.D Mantsha
C/o Lugisani Mantsha Attorneys
First floor, Burnside Island
Block C
410 Jan Smuts Avenue
Craighall
Johannesburg

Per E-mail: info@lugisanimantshaattorneys.co.za

Cc: dan@lugisanimantshaattorneys.co.za

Dear Mr Mantsha

**IN RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE
CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING
ORGANS OF STATE: MS BARBARA HOGAN/MR GEDLEYIHLEKISA ZUMA**

1. We refer to the above matter.
2. We confirm that you are the Attorney of record for Mr. Jacob Gedleyihlekisa Zuma.
3. We email herewith a notice in terms of rule 3.3 of the Commission rules and a statement attached hereto to yourselves on behalf of your client.
4. We look forward to your client's co-operation with the Commission.

Director: **Pritzman Busani Mabunda**: B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: **Dewaïd Leonard Viljoen**: B Proc (RAU), LLM (International Law) (UJ); **S'iso Molongoana**: LLB (UNIZULU),
LLM (Labour Law) (UNISA); **David Matome Mogale**: B Proc (VISTA), **Hlengiwe Pamela Goba**: LLB (UP).



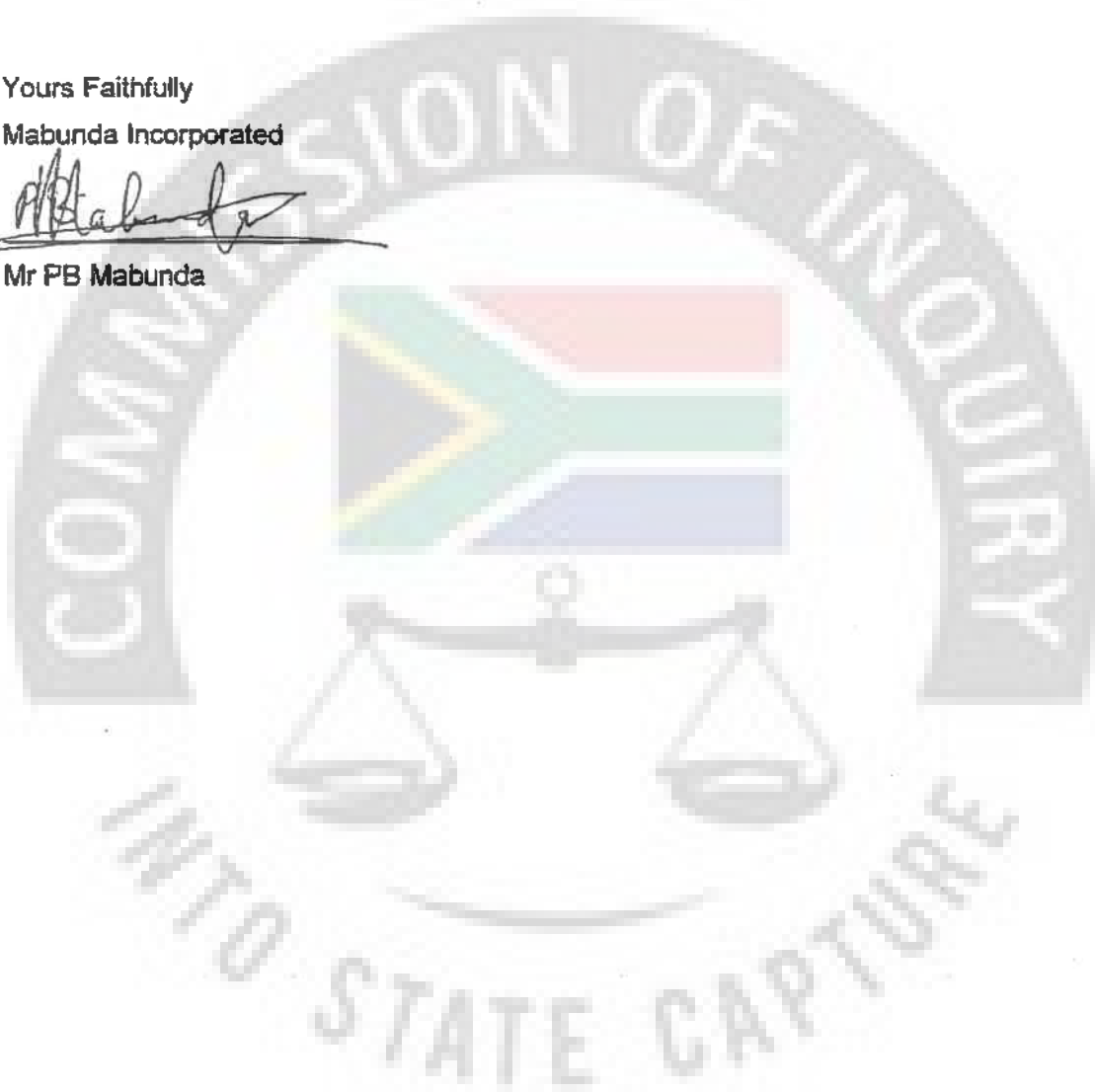
ATTORNEYS AT LAW

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PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

Yours Faithfully

Mabunda Incorporated

Mr PB Mabunda



Director: **Fritzman Busani Mabunda**: B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

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LLM (Labour Law) (UNISA); **David Matome Mogate**: B Proc (VISTA), **Hlengwe Pamela Goba**: LLB (UP)



ATTORNEYS AT LAW

2 Protea Road, Corner Riley, Bedfordview, 2008 Tel: (011) 450 2284/1641 Fax: (011) 450 1566
PO BOX 51238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

23 October 2018

Mr L.D Mantsha
C/o Lugisani Mantsha Attorneys
First floor, Burnside Island
Block C
410 Jan Smuts Avenue
Craighall
Johannesburg

Dear Mr. Mantsha

RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE:MR PRAVIN GORDHAN/MR DANIEL MANTSHA

1. We refer to the above matter.
2. We confirm that you are an implicated party herein.
3. We email herewith a notice in terms of rule 3.3 of the Commission rules and a statement attached hereto to you.
4. We look forward to your co-operation with the Commission

Director: **Pritzman Busani Mabunda** B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP)
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by **Dewald Leonard Viljoen**: B Proc (RAU), LLM (International Law) (UJ), **S'fiso Molongwane**: LLB (UNIZULU),
LLM (Labour Law) (UNISA), **David Matome Mogale**: B Proc (VISTA), **Hlengiwe Pamela Goba**: LLB (UP).

Reg No. 2001/006238/21 - VAT Registration No: 4260193290 - Practice Number 5046

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2 Protea Road, Corner Riley, Bedfordview, 2008 Tel: (011) 450 2284/1641 Fax : (011) 450 1566
PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

Yours Faithfully

Mabunda Incorporated

MR PB MABUNDA

Per E-mail: info@lugisanimantshaattorneys.co.za

Cc: dan@lugisanimantshaattorneys.co.za



Director: **Pritzman Busani Mabunda:** B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
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Assisted by: **Dewald Leonard Viljoen:** B Proc (RAU), LLM (International Law) (UJ); **S'iso Mofongoane:** LLB (UNIZULU),
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Reg No. 2001/006238/21 - VAT Registration No: 4260193299 - Practice Number 5046

Lugisani Mantsha Attorneys

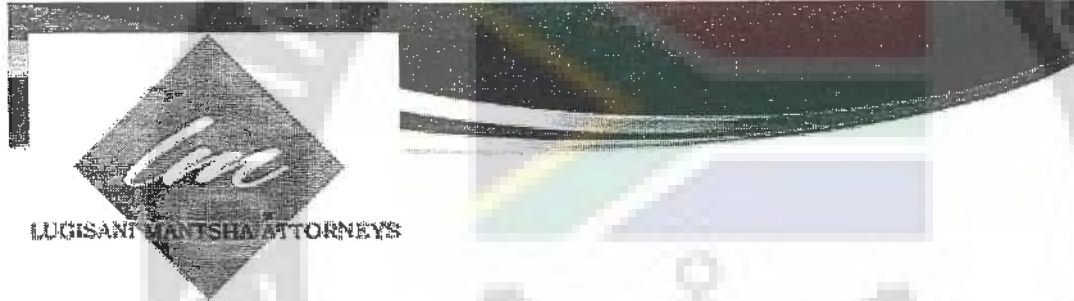
From: Lugisani Mantsha Attorneys <info@lugisanimantshaattorneys.co.za>
Sent: Friday, November 9, 2018 5:14 PM
To: 'Busani Mabunda'
Subject: IN THE JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORAGNS OF STATE: MR PRAVIN GORDHAN
Attachments: letter to Mabunda Inc 9 Nov 2018 - Mr Gordhan.pdf
Importance: High

Dear Sir,

Attached please find a letter for your attention.

Kindly acknowledge receipt of this email.

Kind regards
Yvonne



✉ info@lugisanimantshaattorneys.co.za ☎ 011 781 0099 🌐 www.lugisanimantshaattorneys.co.za
📍 410 Jan Smuts Ave Burnside Island Office Park Block 6

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Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: info@lugisanimantshaattorneys.co.za |
Box 1127 | Randburg | 2125

Our Ref: Mr L D Mantsha LM0257/18/C

Attention: The Secretary of the Commission
Dr K De Wee
C/O MABUNDA INC
The Attorneys of record for the Commission

Per email: busani@mabundainc.com

Date: 09 November 2018

"PRIVATE AND CONFIDENTIAL"
"URGENT"

Dear Sir,

RE: IN THE JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORAGNS OF STATE: MR PRAVIN GORDHAN

1. We refer to the above matter.
2. We advise that due to the number of litigations currently involving our client, our client will only be able to make his election in terms of the Commission rules on or before the 29th November 2018.
3. We therefore request an extension until the 29th November 2018.

We record our thanks in anticipation.

Yours Faithfully

Mr L.D. Mantsha

Electronically sent and therefore not signed

Director: Lugisani Mantsha Bjuris, LLB
Lugisani Mantsha Incorporated Reg:2012/069234/21

78



ATTORNEYS AT LAW

2 Protea Road, Corner Riley, Bedfordview, 2008 Tel: (011) 450 2284/1641 Fax: (011) 450 1566
PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

09 November 2018

Mr Jacob Zuma
C/o Lugisani Mantsha Attorneys
First floor, Burnside Island
Block C
410 Jan Smuts Avenue
Craighall
Johannesburg

Dear Mr. Mantsha

**RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE
CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR
INCLUDING ORGANS OF STATE:MR GORDHAN**

1. We acknowledge receipt of your letter dated 09 November 2018, contents of which have been noted.
2. We are forwarding the letter to our client for instructions.
3. We shall revert back to you as soon as we receive instructions from our client.

Warm Regards.

Mabunda Incorporated

Director: **Pritzman Busani Mabunda:** B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: **Dewaid Leonard Viljoen:** B Proc (RAU), LLM (International Law) (UJ); **S'fiso Molongwana:** LLB (UNIZULU),
LLM (Labour Law) (UNISA); **David Matome Mogale:** B Proc (VISTA), **Hlengiwe Pamela Gaba:** LLB (UP).

Reg No. 2001/006238/21 - VAT Registration No: 4260193299 - Practice Number 5045



2 Protea Road, Corner Riley, Bedfordview, 2008 Tel: (011) 450 2294/1641 Fax : (011) 450 1566
PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

A handwritten signature in black ink, appearing to read 'PB Mabunda', written over a horizontal line.

MR PB MABUNDA

Per E-mail: info@lugisanimantshaattorneys.co.za

Cc: dan@lugisanimantshaattorneys.co.za



Director: **Pritzman Busani Mabunda:** B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip In Criminal Justice and Forensic Auditing (RAU),
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LLM (Labour Law) (UNISA); **David Matome Mogale:** B Proc (VISTA); **Hlengiwe Pamela Goba:** LLB (UP).

Lugisani Mantsha Attorneys

From: Lugisani Mantsha Attorneys <info@lugisanimantshaattorneys.co.za>
Sent: Friday, November 9, 2018 5:11 PM
To: 'Busani Mabunda'
Subject: IN THE JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORAGNS OF STATE: MR NHLANHLA NENE
Attachments: letter to Mabunda Inc 9 Nov 2018 - Mr Nene.pdf

Dear Sir,

Attached please find a letter for your attention.

Kindly acknowledge receipt of this email.

Kind regards
Yvonne



LUGISANI MANTSHA ATTORNEYS

✉ info@lugisanimantshaattorneys.co.za ☎ 011 781 0009 🌐 www.lugisanimantshaattorneys.co.za

📍 410 Jan Smuts Ave Sunnyside Island Office Park Block B

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LUGISANI MANTSHA ATTORNEYS

First floor | Burnside Island | Block 6 | 410 Jan Smuts Ave | Craighall | Johannesburg
Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: info@lugisanimantshaattorneys.co.za |
Box 1127 | Randburg | 2125

Our Ref: Mr L D Mantsha LM0257/18/C

Attention: The Secretary of the Commission
Dr K De Wee
C/O MABUNDA INC
The Attorneys of record for the Commission

Per email: busani@mabundainc.com

Date: 09 November 2018

"PRIVATE AND CONFIDENTIAL"
"URGENT"

Dear Sir,

RE: IN THE JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORAGNS OF STATE: MR NHLANHLA NENE

1. We refer to the above matter and advise that we are considering your application for condonation.
2. We request you to confirm as to whether Mr. Nene had requested to appear before the Commission or whether it was the Commission which had requested him to appear? Kindly provide us with the date of the initial contract between Mr. Nene and the Commission.
3. We further advise that due to the number of litigations involving our client at the moment, he will only be able to make his election on your application on or before the 29th November 2018.

We record our thanks in anticipation.

Director: Lugisani Mantsha Bjuris, LLB
Lugisani Mantsha Incorporated Reg:2012/069234/21

Yours Faithfully

Mr L.D. Mantsha

Electronically sent and therefore not signed



80

info

From: Busani Mabunda <busani@mabundainc.com>
Sent: Sunday, 11 November 2018 10:12 PM
To: Lugisani Mantsha Attorneys
Cc: dan@lugisanimantshaattorneys.co.za
Subject: RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE:MS BARBARA HOGAN/MR JACOB ZUMA

Dear Mr. Mantsha

1. We refer to the above matter.
2. Please click [here](#) to download a copy of the bundle of Ms. Hogan's evidence.
3. Kindy confirm receipt of same in writing.
4. The link referred to in item 2 above expires on the 14th November 2018.

Kind Regards



Busani Mabunda – Director

MABUNDA INCORPORATED

Address: 2 Protea Road, Corner Riley, Bedfordview, 2008
PO BOX 61238, Marshalltown, 2107
DOCEX 424,JHB

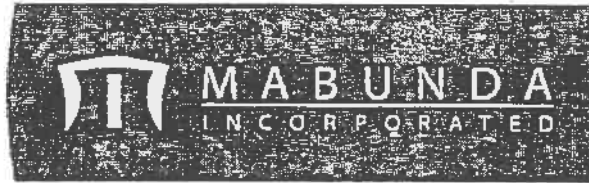
Tel: (011) 450 1641/2284

Fax: 011 450 1566

Email: busani@mabundainc.co.za

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ATTORNEYS AT LAW

2 Protea Road, Corner Riley, Bedfordview, 2008 Tel: (011) 450 2284/1641 Fax: (011) 450 1566
PO BOX 51236, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

14 November 2018

Mr Jacob Zuma
C/o Lugisani Mantsha Attorneys
First floor, Burnside Island
Block C
410 Jan Smuts Avenue
Craighall
Johannesburg

Dear Mr. Mantsha

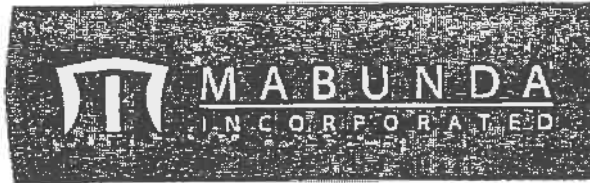
RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: APPLICATION FOR CONDONATION BY THE LEGAL TEAM (MR NENE)

1. We refer to the above matter and in particular to the notice of application by the Legal team served on you via email on the 01st November 2018 and personally on the 2nd November 2018.
2. We confirm that the application will be heard on Thursday, the 15th November 2018 at 10:00 am.
3. We note that you have not stated your intention to oppose and that the time for raising same has lapsed.
4. You will be advised of the outcome of the application as soon as same has been pronounced.

Director: **Fritzman Busani Mabunda**: B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: **Dewald Leonard Viljoer**: B Proc (RAU), LLM (International Law) (UJ), **S'iso Molongoana**: LLB (UNIZULU),
LLM (Labour Law) (UNISA), **David Matome Mogale**: B Proc (VISTA), **Hiengiwe Pamela Goba**: LLB (UP).

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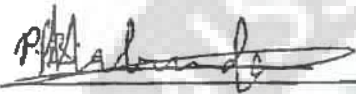


ATTORNEYS AT LAW

2 Protea Road, Corner Riley, Bedfordview, 2008 Tel: (011) 450 2284/1641 Fax : (011) 450 1566
PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

Yours Faithfully

Mabunda Incorporated

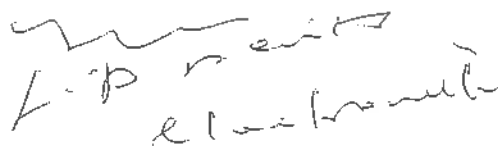


MR PB MABUNDA

Per E-mail: info@lugisanimantshaattorneys.co.za

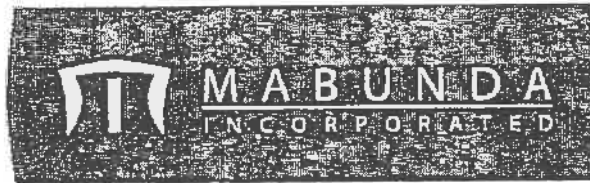
Cc: dan@lugisanimantshaattorneys.co.za

we refer to your letter
dated 14 November 2018 and
confirm that we
have no objections to
your appointment for



Director: **Pritzman Busani Mabunda**: B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: **Dewald Leonard Viljoen**: B Proc (RAU), LLM (International Law) (UJ); **S'iso Molongoana**: LLB (UNIZULU),
LLM (Labour Law) (UNISA); **David Matome Mogale**: B Proc (VISTA), **Mlengiwe Pamela Gaba**: LLB (UP).



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PO BOX 51238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

14 November 2018

Mr Jacob Zuma
C/o Lugisani Mantsha Attorneys
First floor, Burnside Island
Block C
410 Jan Smuts Avenue
Craighall
Johannesburg

Dear Mr. Mantsha

**RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE
CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR
INCLUDING ORGANS OF STATE: APPLICATION FOR POSTPONEMENT
(MR NENE)**

1. We refer to the above matter.
2. We confirm that an application for postponement of Mr. Nene's evidence will be made on Thursday, the 15th November 2018.
3. We attach hereto a copy of the application for your records.

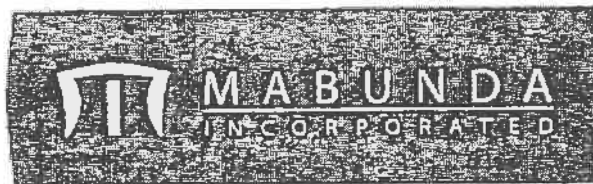
Yours Faithfully

Mabunda Incorporated

Director: **Pritzman Busani Mabunda**: B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: **Dewald Leonard Viljoen**: B Proc (RAU), LLM (International Law) (UJ), **S'iso Molongoana**: LLB (UNIZULU),
LLM (Labour Law) (UNISA); **David Matome Mogale**: B Proc (VISTA), **Hlengiwe Pamela Goba**: LLB (UP).

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PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

Per E-mail: info@lugisanimantshaattorneys.co.za

Cc: dan@lugisanimantshaattorneys.co.za

we refer to your letter dated 14 November 2015. We have reviewed the company and we have not filled paper application to the Registrar of Companies.

Director **Fritzman Busani Mabunda**: B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP), Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU), Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by **Dewald Leonard Viljoen**: B Proc (RAU), LLM (International Law) (UJ); **S'fiso Molongoana**: LLB (UNIZULU), LLB (Labour Law) (UNISA); **David Matome Mogale**: B Proc (VSTA); **Hengiwe Pamela Goba**: LLB (UP).

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PO BOX 51238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

15 November 2018

Mr Jacob Zuma
C/o Lugisani Mantsha Attorneys
First floor, Burnside Island
Block C
410 Jan Smuts Avenue
Craighall
Johannesburg

Dear Mr. Mantsha

RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: APPLICATION FOR POSTPONEMENT (MR NENE)

1. We refer to the above matter and in particular to our letter to your good-selves on Wednesday the 14th of November 2018.
2. We confirm that the application has been granted, with the summons on Mr. Nhlanhla Nene being set aside.
3. The date of appearance will be agreed upon and you will be duly notified.
4. We trust that you will find the above to be in order.

Yours Faithfully

Mabunda Incorporated

Director: **Pritzman Busani Mabunda**: B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: **Dawald Leonard Viljoen**: B Proc (RAU), LLM (International Law) (UJ); **S'fiso Molongoane**: LLB (UNIZULU),
LLM (Labour Law) (UNISA); **David Matome Mogaie**: B Proc (VISTA); **Mtengwiwe Pamela Goba**: LLB (UP).



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PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

MR PB MABUNDA

Per E-mail: info@lugisanimantshaattorneys.co.za

Cc: dan@lugisanimantshaattorneys.co.za



Director: **Pritzman Susani Mabunda:** B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: **Dewald Leonard Viljoen:** B Proc (RAU), LLM (International Law) (UJ); **S'fiso Molongosha:** LLB (UNIZULU),
LLM (Labour Law) (UNISA); **David Matome Mogale:** B Proc (VISTA); **Hfengiwe Pamela Goba:** LLB (UP).

Reg No. 2001/006238/21 - VAT Registration No: 4280193299 - Practice Number 5046

Lugisani Mantsha Attorneys

From: Lugisani Mantsha Attorneys <info@lugisanimantshaattorneys.co.za>
Sent: Thursday, November 15, 2018 9:40 AM
To: 'Busani Mabunda'
Attachments: letter to Mabunda Incorporated 14 November 2018.docx; letter to Mabunda Incorporated 14 November 2018 (2).docx



LUGISANI MANTSHA ATTORNEYS

✉ info@lugisanimantshaattorneys.co.za ☎ 011 781 0099 🌐 www.lugisanimantshaattorneys.co.za

📍 410 Jan Smuts Ave Burnside Island Office Park Block 6

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LUGISANI MANTSHA ATTORNEYS

First floor | Burnside Island | Block 6 | 410 Jan Smuts Ave | Craighall | Johannesburg
Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: info@lugisanimantshaattorneys.co.za |
Box 1127 | Randburg | 2125 |

Our Ref: Mr L.D. Mantsha LM0279/18/S

Your Ref: Mabunda Incorporated
Att: Mr B Mabunda
Per email: busani@mabundainc.com

Date: 15 November 2018

"PRIVATE AND CONFIDENTIAL"

"URGENT"

Dear Sir,

RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR, INCLUDING ORGAS OF STATE: APPLICATION for CONDONATION BY THE LEGAL TEAM (MR NENE)

1. We refer to your letter dated on the 14th November 2018.
2. We have indicated that we are unable to consider the application, due to the fact that the client is involved in several litigations, at this stage, and such consideration can only be made at the time indicated in our letter, however this should not be construed as an objection.

Yours faithfully

Mr L.D. Mantsha

Electronically sent and therefore not signed

Director: Lugisani Mantsha Bjuris, LLB
Lugisani Mantsha Incorporated Reg:2012/069234/21



LUGISANI MANTSHA ATTORNEYS

First floor | Burnside Island | Block 6 | 410 Jan Smuts Ave | Craighall | Johannesburg
Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: info@lugisanimantshaattorneys.co.za |
Box 1127 | Randburg | 2125

Our Ref: Mr L.D. Mantsha LM0279/18/S

Your Ref: Mabunda Incorporated

Att: Mr B Mabunda

Per email: busani@mabundainc.com

Date: 15 November 2018

"PRIVATE AND CONFIDENTIAL"

"URGENT"

Dear Sir,

RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR, INCLUDING ORGAS OF STATE: APPLICATION FOR POSTPONEMENT (MR NENE)

1. We refer to your letter dated 14th November 2018, as indicated that we have no objection to application for postponement.

Yours faithfully

Mr L.D. Mantsha

Electronically sent and therefore not signed

Director: Lugisani Mantsha Bjuris, LLB
Lugisani Mantsha Incorporated Reg:2012/069234/21



ATTORNEYS AT LAW

2 Protea Road, Corner Riley, Bedfordview, 2008 Tel: (011) 450 2264/1641 Fax : (011) 450 1566
PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

21 November 2018

MR JACOB ZUMA

C/o Lugisani Mantsha Attorneys
First floor, Burnside Island
Block C
410 Jan Smuts Avenue
Craighall
Johannesburg

Dear Mr. Mantsha,

RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: ADVOCATE SAM MUOFHE/MR JACOB ZUMA

1. We refer to the above matter.
2. We confirm that we are the attorneys of record for the Commission of Inquiry into Allegations of State Capture, Corruption and Fraud in the Public Sector Including Organs of State, ("The Commission").
1. We email herewith a notice in terms of rule 3.3 of the Commission rules and a statement by Advocate Sam Muofhe for your client's attention.
2. We look forward to your client's cooperation with the Commission

Director: **Pritzman Busani Mabunda**: B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: **Dewald Leonard Viljoen**: B Proc (RAU), LLM (International Law) (UJ); **S'fiso Molongoana**: LLB (UNIZULU),
LLM (Labour Law) (UNISA); **David Matome Mogale**: B Proc (VISTA); **Hlenghwe Pamela Gaba**: LLB (UP).



MABUNDA
INCORPORATED

ATTORNEYS AT LAW

2 Protea Road, Corner Riley, Bedfordview, 2008 Tel: (011) 450 2284/1641 Fax : (011) 450 1566
PO BOX 61238, Marshalltown, 2107 Email Address: info@mabunda-inc.co.za DOCEX 424 JHB

Yours Faithfully

Mabunda Incorporated

MR PB MABUNDA

Per E-mail: info@luqisanimantshaattorneys.co.za

Cc: dan@luqisanimantshaattorneys.co.za

Director: **Pritzman Busani Mabunda**: B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIM, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip. in Criminal Justice and Forensic Auditing (RAU),
Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: **Dewald Leonard Viljoen**: B Proc (RAU), LLM (International Law) (UJ); **S'fiso Molongoana**: LLB (UNIZULU)
LLM (Labour Law) (UNISA); **David Marome Mogale**: B Proc (VISTA); **Hfengwe Pamela Goba**: LLB (UP)

Reg No. 2001/006238/21 - VAT Registration No: 4260193299 - Practice Number 5046

dan

From: Busani Mabunda <busani@mabundainc.com>
Sent: Thursday, 22 November 2018 4:37 PM
To: dan@lugisanimantshaattorneys.co.za
Subject: RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: GENERAL SIPHIWE NYANDA/MR JACOB ZUMA
Attachments: Letter and Notice 3.3 in re General Nyanda-Mr Jacob Zuma.pdf

Good Day Mr Mantsha,

We enclose herewith a letter for your urgent attention.

Kind Regards



Busani Mabunda – Director

MABUNDA INCORPORATED

Address: 2 Protea Road, Corner Riley, Bedfordview, 2008
PO BOX 61238, Marshalltown, 2107
DOCEX 424, JHB

Tel: (011) 450 1641/2284

Fax: 011 450 1566

Email: busani@mabundainc.co.za

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PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

22 November 2018

Mr Jacob Zuma
C/o Lugisani Mantsha Attorneys
First floor, Burnside Island
Block C
410 Jan Smuts Avenue
Craighall
Johannesburg

Dear Mr. Mantsha,

**RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF
STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR
INCLUDING ORGANS OF STATE: GENERAL SIPHIWE NYANDA/MR
JACOB ZUMA**

1. We refer to the above matter.
2. We confirm that we are the attorneys of record for the Commission of Inquiry into Allegations of State Capture, Corruption and Fraud in the Public Sector Including Organs of State, ("The Commission").
1. We email herewith a notice in terms of rule 3.3 of the Commission rules and a statement by General Siphwe Nyanda for your client's attention.
2. We look forward to your client's cooperation with the Commission

Director: *Pritzman Bussani Mabunda*: B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: *Dewald Leonard Viljoen*: B Proc (RAU), LLM (International Law) (UJ); *S'fiso Malongoana*: LLB (UNIZULU),
LLM (Labour Law) (UNISA); *David Matome Mogale*: B Proc (VISTA), *Hlengwe Pamela Goba*: LLB (UP).



ATTORNEYS AT LAW

2 Protea Road, Corner Riley, Bedfordview, 2008 Tel: (011) 450 2284/1641 Fax : (011) 450 1565
PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

Yours Faithfully

Mabunda Incorporated

MR PB MABUNDA

Per E-mail: info@lugisanimantshaattorneys.co.za

Cc: dan@lugisanimantshaattorneys.co.za



Director: **Fritzman Busani Mabunda**: B Proc (UFDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: **Dewald Leonard Viljoen**: B Proc (RAU), LLM (International Law) (UJ); **S'fiso Molongwane**: LLB (UNIZULU),
LLM (Labour Law) (UNISA); **David Matome Mogale**: B Proc (VISTA), **Hlengiwe Pamela Goba**: LLB (UP).



MABUNDA
INCORPORATED

ATTORNEYS AT LAW

2 Protea Road, Corner Riley, Bedfordview, 2008 Tel: (011) 450 2284/1641 Fax : (011) 450 1566
PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

22 November 2018

Mr Jacob Zuma
C/o Lugisani Mantsha Attorneys
First floor, Burnside Island
Block C
410 Jan Smuts Avenue
Graighall
Johannesburg

Dear Mr. Mantsha,

**RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF
STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR
INCLUDING ORGANS OF STATE: ADVOCATE NGOAKO
RAMATLHODI/MR JACOB ZUMA**

1. We refer to the above matter.
2. We confirm that we are the attorneys of record for the Commission of Inquiry into Allegations of State Capture, Corruption and Fraud in the Public Sector Including Organs of State, ("The Commission").
1. We email herewith a notice in terms of rule 3.3 of the Commission rules and a statement by Advocate Ngoako Ramatlhodi for your client's attention.
2. We look forward to your client's cooperation with the Commission

Director: **Pritzman Busani Mabunda:** B Proc (UDV), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: **Dewald Leonard Viljoen:** B Proc (RAU), LLM (International Law) (UJ); **S'fiso Malongoana:** LLB (UNIZULU),
LLM (Labour Law) (UNISA); **David Matome Megale:** B Proc (VISTA), **Hlengiwe Pamela Goba:** LLB (UP).

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PO BOX 81238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

Yours Faithfully

Mabunda Incorporated

MR PB MABUNDA

Per E-mail: info@lugisanimantshaattorneys.co.za

Cc: dan@lugisanimantshaattorneys.co.za

Director: **Pritzman Busani Mabunda**: B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: **Dewald Leonard Viljoen**: B Proc (RAU), LLM (International Law) (UJ), **S'lyse Molongoana**: LLB (UNSZULU),
LLM (Labour Law) (UNISA); **David Matome Mogale**: B Proc (VISTA), **Hfengile Pamela Goba**: LLB (UP).

Reg No. 2001/008238/21 - VAT Registration No. 4260193298 - Practice Number 5046

Lugisani Mantsha Attorneys

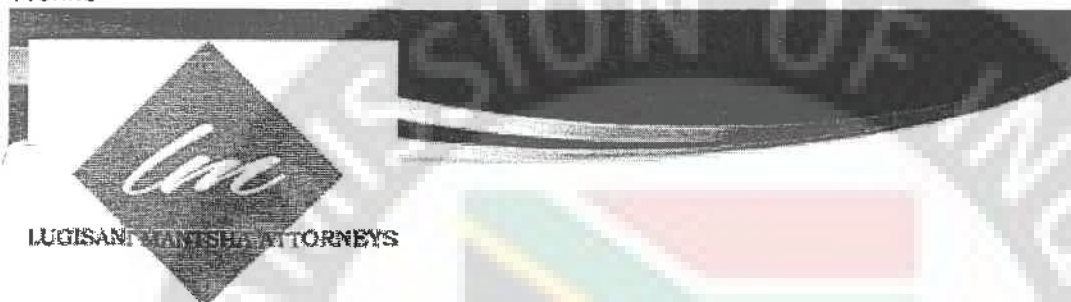
From: Lugisani Mantsha Attorneys <info@lugisanimantshaattorneys.co.za>
Sent: Wednesday, November 28, 2018 6:45 PM
To: 'Busani Mabunda'
Subject: INVITATION TO THE FORMER PRESIDENT J.G ZUMA
Attachments: letter to Mabunda Inc 28 Nov 2018.pdf

Dear Sir,

Attached please find, a letter for your attention.

Kind regards

Yvonne



✉ info@lugisanimantshaattorneys.co.za ☎ 011 781 0099 🌐 www.lugisanimantshaattorneys.co.za

📍 410 Jan Smuts Ave Burnside Island Office Park Block E

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LUGISANI MANTSHA ATTORNEYS

First floor | Burnside Island | Block 6 | 410 Jan Smuts Ave | Craighall | Johannesburg
Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: info@lugisanimantshaattorneys.co.za |
Box 1127 | Randburg | 2125

Our Ref: Mr L D Mantsha LM0257/18/C

Attention: The Secretary of the Commission
Dr K De Wee
C/O MABUNDA INC
The Attorneys of record for the Commission

Per email: busani@mabundainc.com

Date: 28 November 2018

"PRIVATE AND CONFIDENTIAL"
"URGENT"

Dear Sir,

RE: INVITATION TO THE FORMER PRESIDENT J.G ZUMA

1. We refer to the above matter.
2. We advise that the former President is still waiting for the documents which he has requested from the Presidency, and upon receipt of such documents he will respond fully to the Chairperson's invitation.

Yours Faithfully

Mr L.D. Mantsha

Electronically sent and therefore not signed

Director: Lugisani Mantsha Bjuris, LLB
Lugisani Mantsha Incorporated Reg:2012/069234/21

99

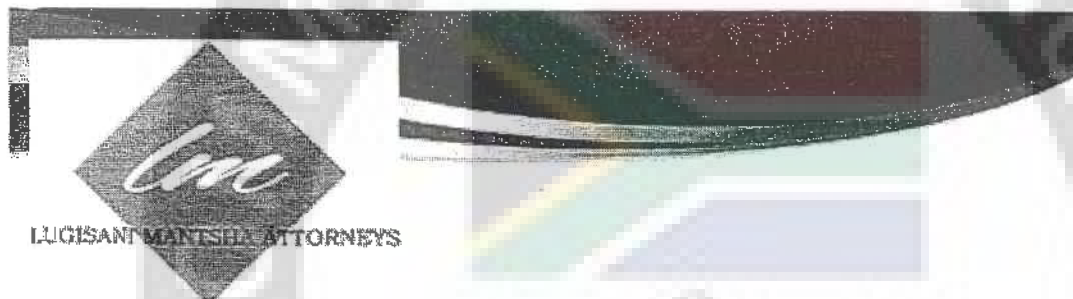
Lugisani Mantsha Attorneys

From: Lugisani Mantsha Attorneys <info@lugisanimantshaattorneys.co.za>
Sent: Wednesday, November 28, 2018 6:44 PM
To: 'Busani Mabunda'
Subject: IN THE JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: ADVOCATE NGOAKO ABEL RAMATLHODI
Attachments: letter to Mabunda Inc 28 Nov 2018 - Ngoako Ramatlhodi.pdf
Importance: High

Dear Sir,

Attached please find, a letter for your attention.

Kind regards
Yvonne



✉ info@lugisanimantshaattorneys.co.za ☎ 011 781 0099 🌐 www.lugisanimantshaattorneys.co.za

📍 410 Jan Smuts Ave Burnside Island Office Park Block 6

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LUGISANI MANTSHA ATTORNEYS

First floor | Burnside Island | Block 6 | 410 Jan Smuts Ave | Craighall | Johannesburg
Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: info@lugisanimantshaattorneys.co.za |
Box 1127 | Randburg | 2125

Our Ref: Mr L D Mantsha LM0257/18/C

Attention: The Secretary of the Commission
Dr K De Wee
C/O MABUNDA INC
The Attorneys of record for the Commission

Per email: busani@mabundainc.com

Date: 28 November 2018

"PRIVATE AND CONFIDENTIAL"
"URGENT"

Dear Sir,

**RE: IN THE JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE
CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING
ORGANS OF STATE: ADVOCATE NGAOKO ABEL RAMATLHODI**

1. We refer to the above matter.
2. We confirm that we have received on the 22 November 2018, a notice in terms of Rule 3.3 of the Commission on behalf of Mr JG Zuma.
3. We further confirm that 14 days will expire on the 14 December 2018.

We record our thanks in anticipation.

Yours Faithfully

Mr L.D. Mantsha

Electronically sent and therefore not signed

Director: Lugisani Mantsha Bjuris, LLB
Lugisani Mantsha Incorporated Reg:2012/069234/21

Lugisani Mantsha Attorneys

From: Lugisani Mantsha Attorneys <info@lugisanimantshaattorneys.co.za>
Sent: Wednesday, November 28, 2018 6:46 PM
To: 'Busani Mabunda'
Subject: IN THE JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MR NHLANHLA NENE
Attachments: letter to Mabunda Inc 28 Nov 2018 - Mr Nene.pdf

Dear Sir,

Attached please find a letter for your attention.
 Kindly acknowledge receipt.

Kind regards
 Yvonne



LUGISANI MANTSHA ATTORNEYS

✉ info@lugisanimantshaattorneys.co.za ☎ 011 781 0990 🌐 www.lugisanimantshaattorneys.co.za

📍 410 Jan Smuts Ave Durstville Office Park Block 2

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LUGISANI MANTSHA ATTORNEYS

First floor | Burnside Island | Block 6 | 410 Jan Smuts Ave | Craighall | Johannesburg
Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: info@lugisanimantshaattorneys.co.za |
Box 1127 | Randburg | 2125

Our Ref: Mr L D Mantsha LM0257/18/C

Attention: The Secretary of the Commission
Dr K De Wee
C/O MABUNDA INC
The Attorneys of record for the Commission

Per email: busani@mabundainc.com

Date: 28 November 2018

"PRIVATE AND CONFIDENTIAL"
"URGENT"

Dear Sir,

RE: IN THE JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MR NHLANHLA NENE

1. We refer to the above matter and our letter dated 09 November 2018 of which no response was received from your office.
2. We advise that our client is unable at this state to respond to notice in terms of Rule 3.3 as indicated in our letter of the 09 November 2018, he will be in a position to make his election by the 14 December 2018.

Yours Faithfully

Mr L.D. Mantsha

Electronically sent and therefore not signed

Director: Lugisani Mantsha Bjuris, LLB
Lugisani Mantsha Incorporated Reg:2012/069234/21

Lugisani Mantsha Attorneys

From: Lugisani Mantsha Attorneys <info@lugisanimantshaattorneys.co.za>
Sent: Wednesday, November 28, 2018 6:47 PM
To: 'Busani Mabunda'
Subject: IN THE JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MR PRAVIN GORDHAN
Attachments: letter to Mabunda Inc 28 Nov 2018 - Mr Gordhan.pdf
Importance: High

Dear Sir,

Kindly find attached letter for your attention.

Kind regards

onne



✉ info@lugisanimantshaattorneys.co.za ☎ 011 781 0099 🌐 www.lugisanimantshaattorneys.co.za

📍 410 Jan Smuts Ave Burnside Island Office Park Block 6

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LUGISANI MANTSHA ATTORNEYS


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Box 1127 | Randburg | 2125

Our Ref: Mr L D Mantsha LM0257/18/C

Attention: The Secretary of the Commission
Dr K De Wee
C/O MABUNDA INC
The Attorneys of record for the Commission

Per email: busani@mabundainc.com

Date: 28 November 2018



"PRIVATE AND CONFIDENTIAL"
"URGENT"

Dear Sir,

**RE: IN THE JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE
CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING
ORGANS OF STATE: MR PRAVIN GORDHAN**

1. We refer to the above matter and our letter dated 09 November 2018 of which no response was received from your office.
2. We advise that our client is unable to respond at this stage to the notice in terms of Rule 3.3 for reasons indicated in our letter of the 09 November 2018, he will be in a position to make his election by the 14 December 2018.

Yours Faithfully

Mr L.D. Mantsha

Electronically sent and therefore not signed

Director: Lugisani Mantsha Bjuris, LLB
Lugisani Mantsha Incorporated Reg:2012/069234/21



ATTORNEYS AT LAW

2 Protea Road, Corner Riley, Bedfordview, 2008 Tel: (011) 450 2284/1641 Fax: (011) 450 1566
PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

06 December 2018

Mr. Jacob Zuma
C/O LUGISANI MANTSHA ATTORNEYS
First floor, Burnside Island
Block C
410 Jan Smuts Avenue
Craighall
Johannesburg

Dear Mr. Mantsha

RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: GENERAL SIPHIWE NYANDA/MR JACOB ZUMA

1. We refer to the above matter.
2. We confirm that the evidence of General Sphiwe Nyanda will not be presented on Monday the ,10th December 2018 as previously communicated.
3. We undertake to communicate the date of General Nyanda's 2019 presenting of evidence, by no later than close of business on Friday, the 07th of December 2018.

Director: **Pritzman Busani Mabunda**: B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP), Dip. Advanced Banking (RAU), Dip In Criminal Justice and Forensic Auditing (RAU), Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: **Dewald Leonard Viljoen**: B Proc (RAU), LLM (International Law) (UJ); **S'fiso Molongoana**: LLB (UNIZULU), LLM (Labour Law) (UNISA); **David Matome Mogale**: B Proc (VISTA); **Hlengiwe Pamela Goba**: LLB (UP).



MABUNDA
INCORPORATED

ATTORNEYS AT LAW

2 Protea Road, Corner Riley, Bedfordview, 2008 Tel: (011) 450 2284/1841 Fax : (011) 450 1566
PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

4. We trust that you will find the above to be in order and look forward to your client's continued co-operation with the Commission.

Yours Faithfully

Mabunda Incorporated

MR PB MABUNDA

Per E-mail: info@lugisanimantshaattorneys.co.za

Cc: dan@lugisanimantshaattorneys.co.za

Director: **Pritzman Busani Mabunda**: B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: **Dewald Leonard Viljoen**: B Proc (RAU), LLM (International Law) (UJ); **S'fiso Molongoana**: LLB (UNIZULU),
LLM (Labour Law) (UNISA); **David Matome Mogale**: B Proc (VISTA), **Hlengwe Pamela Goba**: LLB (UP).



ATTORNEYS AT LAW

2 Protea Road, Corner Riley, Bedfordview, 2008 Tel: (011) 450 2284/1641 Fax : (011) 450 1568
PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JH6

10 December 2018

Mr. Jacob Zuma
C/O LUGISANI MANTSHA ATTORNEYS
First floor, Burnside Island
Block C
410 Jan Smuts Avenue
Craighall
Johannesburg

Dear Mr. Mantsha

**RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE
CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR
INCLUDING ORGANS OF STATE: GENERAL SIPHIWE NYANDA/MR
JACOB ZUMA**

1. We refer to the above matter and, in our letter, dated Thursday the ,06th December 2018, in which we undertook to confirm the date of the Presenting of evidence of General Nyanda in 2019.
2. We confirm that General Nyanda's evidence is scheduled to be presented on the 06th February 2019.
3. We trust that you will find the above to be in order.

Yours Faithfully

Director: **Pritzman Busani Mabunda**: B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: **Dewald Leonard Viljoen**: B Proc (RAU), LLM (International Law) (UJ); **S'fiso Molongoana**: LLB (UNIZULU),
LLM (Labour Law) (UNISA); **David Matome Mogale**: B Proc (VISTA), **Hlengiwe Pamela Goba**: LLB (UP).



MABUNDA
INCORPORATED

ATTORNEYS AT LAW

2 Protea Road, Corner Riley, Bedfordview, 2008 Tel: (011) 450 2264/1641 Fax: (011) 450 1566
PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

Mabunda Incorporated

MR PB MABUNDA

Per E-mail: info@lugisanimantshaattorneys.co.za

Cc: dan@lugisanimantshaattorneys.co.za

Director: **Pritzman Busani Mabunda**: B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: **Dewald Leonard Viljoen**: B Proc (RAU), LLM (International Law) (UJ); **S'fiso Molongoana**: LLB (UNIZULU),
LLM (Labour Law) (UNISA); **David Matome Mogale**: B Proc (VISTA), **Hlengiwe Pantiela Goba**: LLB (UP).



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2 Protea Road, Corner Riley, Bedfordview, 2008 Tel: (011) 450 2284/1641 Fax: (011) 450 1566
 PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

30 January 2018

Mr. Jacob Zuma
 C/o Lugisani Mantsha Attorneys
 First floor, Burnside Island
 Block C
 410 Jan Smuts Avenue
 Craighall
 Johannesburg

Dear Mr. Mantsha

**RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF
 STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC
 SECTOR INCLUDING ORGANS OF STATE:MR ANGELO AGRIZZI
 ("MR AGRIZZI")/MR JACOB ZUMA**

1. We refer to the above matter.
2. We enclose herewith a notice in terms of rule 3.3 of the Commission rules for your client's attention.
3. We look forward to your client's co-operation with the Commission.

Yours Faithfully

Mabunda Incorporated

Director: *Pritzman Busani Mabunda*: B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
 Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
 Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: *Dewald Leonard Viljoen*: B Proc (RAU), LLM (International Law) (UJ); *S'tiso Molongoana*: LLB (UNIZULU),
 LLM (Labour Law) (UNISA); *David Matome Mogale*: B Proc (VISTA), *Hlengiwe Pamela Goba*: LLB (UP).

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ATTORNEYS AT LAW

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PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB


MR PB MABUNDA

Per E-mail: info@lugisanimantshaattorneys.co.za

Cc: dan@lugisanimantshaattorneys.co.za



Director: **Pritzman Busani Mabunda:** B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: **Dewald Leonard Viljoen:** B Proc (RAU), LLM (International Law) (UJ); **S'fiso Molongoana:** LLB (UNIZULU),
LLM (Labour Law) (UNISA); **David Matome Mogale:** B Proc (VISTA), **Hlengiwe Pamela Goba:** LLB (UP).

Reg No. 2001/006238/21 - VAT Registration No: 4260193299 - Practice Number 5048

Lugisani Mantsha Attorneys

From: Lugisani Mantsha Attorneys <info@lugisanimantshaattorneys.co.za>
Sent: Thursday, February 7, 2019 11:22 AM
To: 'inquiries@sastatecapture.org.za'
Cc: 'Busani Mabunda'
Subject: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MR ANGELO AGRIZZI ("MR AGRIZZI")/MR JACOB ZUMA
Attachments: LETTER TOO COMMISSION, MABUNDA 7 Feb '19.pdf

Good day,

Please find attached letter for your attention.

Kind regards,
Dayna



✉ info@lugisanimantshaattorneys.co.za ☎ 011 781 0039 🌐 www.lugisanimantshaattorneys.co.za

📍 410 Jan Smuts Ave Durbanville Island Office Park Block 2

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LUGISANI MANTSHA ATTORNEYS

First floor | Burnside Island | Block 6 | 410 Jan Smuts Ave | Craighall | Johannesburg
Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: info@lugisanimantshaattorneys.co.za |
Box 1127 | Randburg | 2125

Our Ref: Mr L.D Mantsha LM0279/19/A

Secretary of Commission of Inquiry
C/o MABUNDA INC
2nd floor hillside house
17 Empire Road
Parktown
Johannesburg
2193

Tel: (010) 214-0651

Email: inquiries@sastatecapture.org.za

Website: www.sastatecapture.org.za

07 February 2019

Dear Mr P. Pedlar,

**RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE
CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR
INCLUDING ORGANS OF STATE: MR ANGELO AGRIZZI ("MR
AGRIZZI")/MR JACOB ZUMA**

1. We refer to the above matter.
2. We acknowledge receipt of the notice in terms of rule 3.3 of the commission rules on behalf of our client.
3. We reiterate that our client to this very day, has always cooperated with the commission. He has acknowledged all the notices sent to him and has exercised

his rights as per the Commission rules, the Constitution and law. Our client, through our office and counsel on brief has attended the Commission hearings.

Your faithfully

Mr L.D Mantsha

Electronically sent and therefore not signed



info

From: inquiries@sastatecapture.org.za
Sent: Thursday, 07 February 2019 12:03 PM
To: Lugisani Mantsha Attorneys
Cc: 'Busani Mabunda'
Subject: Re: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MR ANGELO AGRIZZI ("MR AGRIZZI")/MR JACOB ZUMA

Dear Sir/Madam,

Good day,

Thank you for your email.
This is to acknowledge receipt of your email.

Your letter has been forwarded to the relevant parties.

Regards,
COMMISSION OF INQUIRY INTO STATE CAPTURE | Hillside House, 2nd Floor,
17 Empire Road, Parktown, Johannesburg, 2193 | Gauteng | South Africa
| Tel: 010 214 0651 | Email: inquiries@sastatecapture.org.za |
www.sastatecapture.org.za

Quoting Lugisani Mantsha Attorneys <info@lugisanimantshaattorneys.co.za>:

> Good day,
>
>
>
> Please find attached letter for your attention.
>
>
>
> Kind regards,
>
> Dayna

Lugisani Mantsha Attorneys

From: Busani Mabunda <busani@mabundainc.com>
Sent: Wednesday, March 6, 2019 11:41 PM
To: Lugisani Mantsha Attorneys
Cc: dan@lugisanimantshaattorneys.co.za; Busani Mabunda
Subject: RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE
Attachments: Letter to Jacob Zuma 4 March 2019.pdf

Dear Mr. Mantsha

1. We refer to the above matter.
2. Enclosed herewith please find for your **URGENT** attention.
3. Kindly confirm receipt of same in writing.

Kind Regards



Busani Mabunda – Director

MABUNDA INCORPORATED

Address: 2 Protea Road, Corner Riley, Bedfordview, 2008
 PO BOX 61238, Marshalltown, 2107
 DOCEX 424, JHB
Tel: (011) 450 1641/2284
Fax: 011 450 1566

Email: busani@mabundainc.co.za

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PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JMB

04 March 2019

Mr Jacob Zuma
C/O Lugisani Mantsha Attorneys
First floor, Burnside Island
Block C
410 Jan Smuts Avenue
Craighall
Johannesburg

Dear Mr. Mantsha

**RE: JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF
STATE CAPTURE**

1. We refer to the above matter.
2. You are kindly requested to refer all further correspondence and communication to the Secretariat of the Commission Mr. Peter Pedlar on the following contact details:

Mobile Number: 081 825 2568

Email: PeterP@commissionsc.org.za

3. They will forthwith be dealing with your matter.

Warm Regards

Mabunda Incorporated

Director: **Pritzman Busani Mabunda**: B Proc (UDW), LLB (Wits), LL.M (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: **Dewald Leonard Viljoen**: B Proc (RAU), LL.M (International Law) (UJ); **S'fiso Molongoana**: LL.B (UNIZULU),
LL.M (Labour Law) (UNISA); **David Matome Mogale**: B Proc (VISTA).



MABUNDA
INCORPORATED

ATTORNEYS AT LAW

2 Protea Road, Corner Riley, Bedfordview, 2008 Tel: (011) 450 2284/1641 Fax : (011) 450 1556
PO BOX 61238, Marshalltown, 2107 Email Address: info@mabundainc.co.za DOCEX 424 JHB

MR PB MABUNDA

Per E-mail: info@lugisanimantshaattorneys.co.za

Cc: dan@lugisanimantshaattorneys.co.za



Director: *Fritzman Busani Mabunda*: B Proc (UDW), LLB (Wits), LLM (Labour Law) UNIN, MPhil (Medical Law and Ethics) (UP),
Dip. Advanced Banking (RAU), Dip in Criminal Justice and Forensic Auditing (RAU),
Certificate in Sports Law (UCT), Certificate in Admin & Const Law (UCT).

Assisted by: *Dewald Leonard Viljoen*: B Proc (RAU), LLM (International Law) (UJ); *S'fiso Molongoana*: LLB (UNIZULU),
LLM (Labour Law) (UNISA); *David Matome Mogale*: B Proc (VISTA).

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Lugisani Mantsha Attorneys

From: Lugisani Mantsha Attorneys <info@lugisanimantshaattorneys.co.za>
Sent: Thursday, March 7, 2019 4:55 PM
To: 'Busani Mabunda'
Subject: IN THE JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE: MR. J G ZUMA
Attachments: letter to Mabunda Inc 07 March 2019.pdf

Dear Sir,

Please find attached letter for your attention.

Kind regards,
Dayna



✉ info@lugisanimantshaattorneys.co.za ☎ 011 721 0000 🌐 www.lugisanimantshaattorneys.co.za

📍 410 Jan Smuts Ave Sunnyside Island Office Park Block B

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LUGISANI MANTSHA ATTORNEYS

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Box 1127 | Randburg | 2125

Our Ref: Mr L D Mantsha LM0257/18/C

Attention: The Secretary of the Commission
Dr K De Wee
C/O MABUNDA INC
The Attorneys of record for the Commission

Per email: busani@mabundainc.com

Date: 07 March 2019

"PRIVATE AND CONFIDENTIAL"
"URGENT"

Dear Sir,

**RE: IN THE JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE
CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING
ORGANS OF STATE: MR. J G ZUMA**

We acknowledge receipt of your letter dated the 4th March 2019, which was received on the 6th March 2019.

Yours Faithfully

Mr L.D. Mantsha

Electronically sent and therefore not signed

Director: Lugisani Mantsha Bjuris, LLB
Lugisani Mantsha Incorporated Reg:2012/069234/21

info

From: info <info@lugisanimantshaattorneys.co.za>
Sent: Friday, 26 April 2019 8:28 PM
To: 'Peter P. Pedlar'
Subject: "ALLEGED FAILURE BY THE FORMER PRESIDENT, MR. JG ZUMA TO DELIVER AN AFIDAVIT REQUESTED BY THE CHAIRPERSON "
Attachments: Letter to Mr. Peter Pedlar 26 April 2019.pdf, Diary of the former President of RSA, Mr Jacob Zuma

Dear Sirs,

Please find an enclosed letter for your attention.

Regards,
 Dayna Arnoldi



LUGISANIMANTSHA ATTORNEYS

☎ 011 707 0000 ☎ 011 707 0000 ☎ www.lugisanimantshaattorneys.co.za

📍 4th Floor, 1000 Avenue of the Stars, Sandton, Johannesburg

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LUGISANI MANTSHA ATTORNEYS

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Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: info@lugisanimantshaattorneys.co.za |
Box 1127 | Randburg | 2125

Our Ref: Mr. D Mantsha

Att: Mr. Perter Pedlar
Acting Secretary
Commission of Inquiry
Per email: PeterP@commissionsc.org.za

And to the Chairperson of the Commission

And also, by hand
2nd Floor, Hillside House
17 Empire Road
Parktown
Johannesburg
2193



26 April 2019

"PRIVATE AND CONFIDENTIAL"

"URGENT"

Dear Sirs,

**RE: "ALLEGED FAILURE BY THE FORMER PRESIDENT, MR. JG ZUMA TO
DILIVER AN AFIDAVIT REQUESTED BY THE CHAIRPERSON"**

1. We refer to your letter dated 26th April 2019. At the onset, we take offence to your accusation or labelling that the former President Zuma **"failed to deliver an affidavit as requested by the chairperson of the Commission"**, your characterization and labelling of the former President Zuma in this regard displays prejudice towards him.

2. We indeed confirm that we had informed the Commission that we had requested information from Presidency in order to provide the response to the invite of the Chairperson of the Commission, sadly the Presidency opted to provide the said information to the Commission and not to former President Zuma, and in return the Commission, for reasons unknown to us deemed it fit not to share the said information with us while knowing very well that we had requested the same information from Presidency in order to respond to the invite of the chairperson.
3. Presidency had only provided us with some of the information we had requested, only on the 24th April 2019, enclosed herewith find the copy of the email from Presidency enclosing some of the information that we have requested.
4. We reject strongly any suggestion that the Former President is not co-operating with the Commission, in fact it is the Commission and the Presidency's lack of co-operation in providing us with the information in their possession which is required by former President Zuma for the purposes of responding to the chairperson's invite, this should be a matter of grave concern to the Commission and everyone who cares about the impartiality, fairness and the integrity of the Commission process.
5. The Former President Zuma had requested the said information from Presidency in September 2018 and was partially provided with some information on 24th April 2019, and further the Commission, which has been provided with the said information by the Presidency (for reasons which we hope will be known soon) did not give us the said information, while knowingly as we had informed the Commission in writing that we are awaiting the said information from the Presidency in order to respond to the invite of the chairperson.
6. The former President insists to be provided with the complete information which he had requested from Presidency in order for him to respond to the chairperson's invite, and his rights are strictly reserved in this regard.

Yours Faithfully

Mr. L.D. Mantsha

Electronically sent and therefore not signed

Copy received by _____ on behalf of the chairperson of the
Commission.



123



2nd floor, Hillside House
17 Empire Road,
Parktown
Johannesburg
2193

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**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

26 April 2019

Mr Lungisani Mantsha
Lungisani Mantsha Attorneys
1st floor
Burnside Island Block 6
410 Jan Smuts Ave
Craighall
Johannesburg

Dear Sirs

Failure by the former President, Mr JG Zuma, to deliver an affidavit requested by the Chairperson

1. It has been brought to my attention that on 13 September 2018 the Chairperson of the Commission, Deputy Chief Justice Zondo, made a request to the former President, Mr Jacob G Zuma, your client, through yourselves in an open Commission hearing that Mr Zuma deliver to the Commission an affidavit responding to allegations relating to him made by Ms Vytjie Mentoor in her affidavit submitted to the Commission and to allegations relating to him made by Mr Themba Maseko in his statement to the Commission.
2. I understand that sometime in October 2018 an inquiry was made to yourselves on behalf of the Commission to find out how far the former President was with complying with the Chairperson's request and, as a result thereof, you sent us your letter dated 11 October 2018. In that letter you informed us that the former President was attending to the matter and had written to the Presidency through his lawyers requesting necessary records so that he could assist the Commission.
3. In your letter you expressed the hope that you would receive the required information from the Presidency in the "coming weeks" and that, thereafter, "[you] shall promptly communicate with the Commission".
4. The Commission notes that it was on 13 September 2018 when the Chairperson made the request to the former President through you and it was on 11 October 2018 when you wrote the letter indicating that the former President was attending to the matter and had, through his lawyers, written to the Presidency to ask for certain information.
5. The Commission notes with deep concern that it is now more than seven (7) months since the Chairperson made the request and over six months since you wrote that letter and the former President has not complied with the Chairperson's request and has not informed the

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Commission if he has any difficulties in complying with the request and, if so, what those are. For over six months since your letter the former President has not delivered the affidavit, has not informed the Commission if he has any difficulty with complying with the Chairperson's request and has not kept the Commission updated as to why he has not over such a long period failed to comply with the Chairperson's request.

6. The Commission has considered it necessary to convey to you and the former President its deep concern about the delay.

Yours sincerely



MR PETER PEDLAR
Acting Secretary

**Judicial Commission of Inquiry Into Allegations of State Capture, Corruption and Fraud
in the Public Sector Including Organs of State Capture**





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**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

30 April 2019

Lugisani Mantsha Attorneys
1st floor Burnside Island Block 6
410 Jan Smuts Ave
Craighall
Johannesburg

Dear Sir

Appearance of former President Mr J.G. Zuma, before the Commission

1. The Commission believes that it is important that time be set aside when the former President, Mr J G Zuma, whom you represent, would appear before the Commission in order to:
 - (a) give his side of the story on the evidence given by various witnesses in which his name has been mentioned or in which he has been implicated in one way or another.
 - (b) to answer such questions as the Chairperson and/or a representative of the Commission's Legal Team or a Commission's evidence leader may wish to put to him about matters which are the subject of the Commission's inquiry.
2. The questions that Mr Zuma will be asked will cover matters dealt with by certain witnesses who have given evidence before the Commission in so far as he may have knowledge thereof as well as any other matters that fall within the terms of reference of the Commission. The list of witnesses in regard to whose evidence Mr Zuma will be asked questions is attached to this letter marked "A". Copies of the statements or affidavits (or the relevant parts thereof) of the witnesses were previously sent to you. Accordingly, they are not being sent again.
3. Pursuant to the above, the Commission has set aside 15 to 19 July 2019 as the dates during which it would like the former President to appear before it for the purposes given in 1(a) and (b) above.



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**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

06 May 2019

To: Lugisani Mantsha Attorneys

dan@lugisanimantshaattorneys.co.za

Dear Sir

**APPEARANCE OF FORMER PRESIDENT, MR JACOB ZUMA, BEFORE THE
COMMISSION: LIST OF WITNESSES**

1. With reference to our letter dated 30 April 2019, it has come to the attention of the Commission that the list of witnesses in regards to whose evidence Mr Zuma will be asked questions, were omitted, and to which we refer as Annexure A in the said letter.
2. This oversight in attaching the list of witnesses is regretted.
3. We hereby attach as per Annexure A the list of witnesses.
4. It will be highly appreciated if you will inform your client of the contents of this letter.

Kind regards

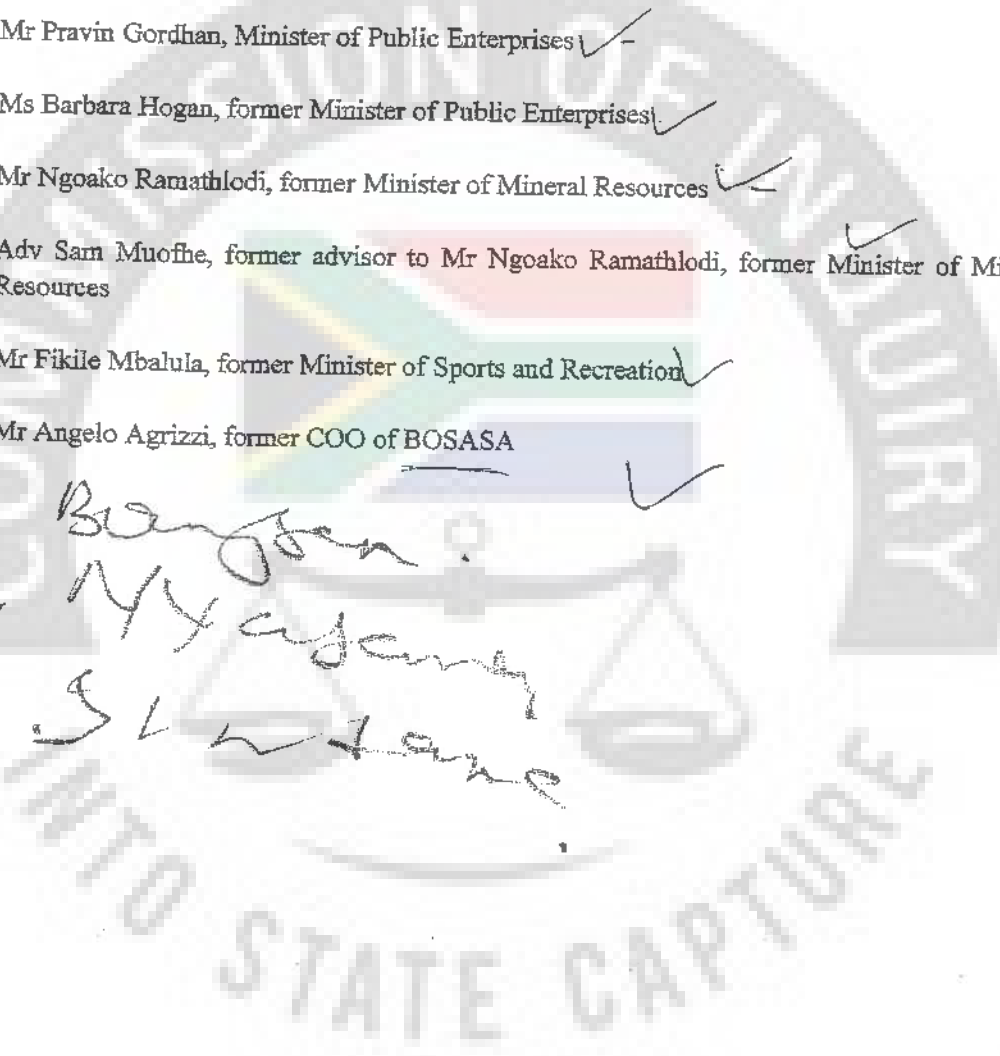
Mr. Peter Pedlar,

Acting Secretary

Judicial Commission of Inquiry Into Allegations of State Capture,
Corruption and Fraud in the Public Sector Including Organs of State

Annexure "A"

1. Mr Themba Maseko, former CEO or Director-General of GCIS
2. Ms Vytjie Mentor, former ANC Member of Parliament and Chairperson of the Public Enterprises Portfolio Committee
3. Mr Nhlanhla Nene, former Minister of Finance ✓
4. Mr Pravin Gordhan, Minister of Public Enterprises ✓
5. Ms Barbara Hogan, former Minister of Public Enterprises ✓
6. Mr Ngoako Ramathlodi, former Minister of Mineral Resources ✓
7. Adv Sam Muofhe, former advisor to Mr Ngoako Ramathlodi, former Minister of Mineral Resources ✓
8. Mr Fikile Mbalula, former Minister of Sports and Recreation ✓
9. Mr Angelo Agrizzi, former COO of BOSASA ✓
10. Bongani ✓
11. Nyaganyi ✓
12. S L Lame ✓



info@lugisanimantshaattorneys.co.za

From: info@lugisanimantshaattorneys.co.za
Sent: Thursday, 09 May 2019 10:58
To: 'PeterP@commissionsc.org.za'
Subject: APPEARANCE OF FORMER PRESIDENT, MAR. JACOB ZUMA , BEFORE THE COMMISSION: LIST OF WITNESSES
Attachments: Letter to Mr. Peter Pedlar 09 May 2019.pdf

Dear Sir,

Please find enclosed letter attached for your attention.

Kind regards,
 Dayna Arnoldi



LUGISANT MANTSHA ATTORNEYS

✉ info@lugisanimantshaattorneys.co.za ☎ 011 781 0088 🌐 www.lugisanimantshaattorneys.co.za

📍 410 Jan Smuts Ave Burnside Island Office Park Block 5

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LUGISANI MANTSHA ATTORNEYS

First floor | Burnside Island | Block 6 | 410 Jan Smuts Ave | Craighall | Johannesburg
Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: info@lugisanimantshaattorneys.co.za |
Box 1127 | Randburg | 2125 |

Our Ref: Mr. D Mantsha

Att: Mr. Perter Pedlar

Acting Secretary

Commission of Inquiry

Per email: PeterP@commissionsc.org.za



09 May 2019

"PRIVATE AND CONFIDENTIAL"

"URGENT"

Dear Sirs,

RE: APPEARANCE OF FORMER PRESIDENT, MR. JACOB ZUMA, BEFORE THE
COMMISSION: LIST OF WITNESSES

We refer to the above matter and confirm receipt of your letter dated 06 May 2019 and shall revert to you after consultation with our client.

Yours Faithfully

Mr. L.D. Mantsha

Electronically sent and therefore not signed

info

From: Peter P. Pedlar <PeterP@commissionsc.org.za>
Sent: Monday, 13 May 2019 7:56 AM
To: info@lugisanimantshaattorneys.co.za
Cc: Boipelo B. Ratshikana; Andre A. Lamprecht; Ouma Thagane
Subject: RE: NOTICE IN TERMS OF RULE 3.3: MR. RAJESH SUNDARAM

Thank you Sir/Madam,

I look forward to your valued response.

Kind regards

P. Pedlar

Acting Secretary



COMMISSION OF INQUIRY INTO STATE CAPTURE | Hillside House, 3rd Floor, 17 Empire Road, Parktown,
Johannesburg, 2193 | Gauteng | South Africa | email: secretary@commissionsc.org.za | www.sastatecapture.org.za |
Mobile +27(0)71320 8293

From: info@lugisanimantshaattorneys.co.za <info@lugisanimantshaattorneys.co.za>
Sent: Thursday, 09 May 2019 11:33
To: Peter P. Pedlar <PeterP@commissionsc.org.za>
Subject: NOTICE IN TERMS OF RULE 3.3: MR. RAJESH SUNDARAM

Dear Sir,

Please find enclosed letter attached for your attention.

Regards,
Dayna Arnoldi

info

From: Peter P. Pedlar <PeterP@commissionsc.org.za>
Sent: Tuesday, 14 May 2019 7:29 AM
To: info@lugisanimantshaattorneys.co.za
Cc: Andre A. Lamprecht; Boipelo B. Ratshikana; Ouma Thagane
Subject: RE: APPEARANCE OF FORMER PRESIDENT, MAR. JACOB ZUMA , BEFORE THE COMMISSION: LIST OF WITNESSES

Dear Mr Mantsha,

We confirm receipt of your letter on 9 May 2019 and look forward to your response after you have consulted with your client.

Kind regards

P. Pedlar

Acting Secretary



COMMISSION OF INQUIRY INTO STATE CAPTURE | Hillside House, 3rd Floor, 17 Empire Road, Parktown, Johannesburg, 2193 | Gauteng | South Africa | email: secretary@commissionsc.org.za | www.sastatecapture.org.za | Mobile +27(0)71320 8293

From: info@lugisanimantshaattorneys.co.za <info@lugisanimantshaattorneys.co.za>
Sent: Thursday, 09 May 2019 10:58
To: Peter P. Pedlar <PeterP@commissionsc.org.za>
Subject: APPEARANCE OF FORMER PRESIDENT, MAR. JACOB ZUMA , BEFORE THE COMMISSION: LIST OF WITNESSES

Dear Sir,

Please find enclosed letter attached for your attention.

Kind regards,
Dayna Arnoldi



2nd floor, Hillside House
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Web: www.sastatecapture.org.za

**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

29 May 2019

Lugisani Mantsha Attorneys
1st floor Burnside Island Block 6
410 Jan Smuts Ave
Craighall
Johannesburg

Dear Sir

Appearance of former President, Mr J.G. Zuma, before the Commission

1. I refer to my letter dated 30 April 2019, read with the one dated 6 May 2019.
2. The Commission notes that soon it will be a month since we sent you our letter of 30 April but we have not yet received a substantive response to the letter.
3. It would be highly appreciated if you would kindly let us have the former President's substantive response by Tuesday 4 June 2019.

Yours sincerely

PETER PEDLAR

Acting Secretary

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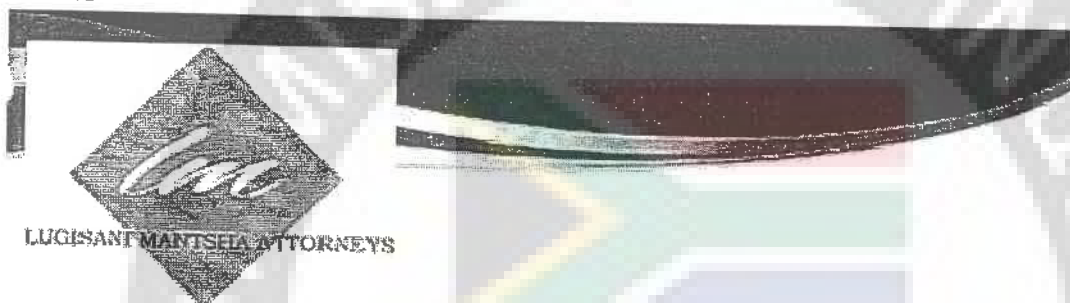
info@lugisanimantshaattorneys.co.za

From: info@lugisanimantshaattorneys.co.za
Sent: Friday, 31 May 2019 15:14
To: 'PeterP@commissionsc.org.za'
Subject: APPEARANCE OF FORMER PRESIDENT, MR. JACOB ZUMA, BEFORE THE COMMISSION
Attachments: Letter to Peter Pedlar 31 May 2019.pdf
Importance: High

Dear Sir,

Attached please find a letter for your attention.

Kind regards,
Yvonne



✉ info@lugisanimantshaattorneys.co.za ☎ 011 791 0009 🌐 www.lugisanimantshaattorneys.co.za
📍 410 Jan Smuts Ave Durbanville Island Office Park Block 6

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LUGISANI MANTSHA ATTORNEYS

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Box 1127 | Randburg | 2125

Our Ref: Mr. D Mantsha LM0257/18/C

Att: Mr. Perter Pedlar
Acting Secretary
Commission of Inquiry
Per email: PeterP@commissionsc.org.za

And also, by hand

And to

Att: Hon. Justice R. Zondo
Chairperson of the Commission of Inquiry
2nd Floor Hillside House
17 Empire Road
Parktown
Johannesburg
2193

And also, by hand

31 May 2019

"PRIVATE AND CONFIDENTIAL"

"URGENT"

Dear Sirs,

RE: **APPEARANCE OF FORMER PRESIDENT, MR. JACOB ZUMA, BEFORE THE COMMISSION**

1. We refer to the letters from the Commission dated 30 April and 06 May 2019.
2. Our client rejects your accusation as contained in your previous letter that he failed to comply with any request from the Commission or its Chairperson as

untrue, and further that our client is of the view that such unfounded accusation reveals the Commission's antipathy towards him, he is very concerned about the said attitude since he has been participating and cooperating with the commission within the legal parameters of the commission. He finds it unfortunate that you have adopted this common, yet baseless grand narrative against him.

3. In terms of the Commission's Rules and Notices, our client has an election whether or not he wishes to cross-examine and/or put a version to a witness the Commission alleges has implicated him. Our client's election in terms of the Commission's own rules cannot be interpreted as non-cooperation.
4. Our client has noted with concern that he has been publicly and in an unprecedented way been singled out for mention by the Chairperson of the Commission and further that the Commission has unfairly and incorrectly accused him of failing "to deliver an affidavit", gave our client an impression that he is to be treated differently. It is our client's observation that the Commission has already prejudged him and seeks to portray him in a negative light. Our client finds this politicization of a judicial process rather unfortunate and deeply disturbing.
5. For the record, our client relishes the moment when he will publicly, in appropriate, impartial, credible and truly independent forums, expose what lies according to him behind the manipulation of legal and judicial processes, our client reaffirms his deep respect to judicial processes. He will, publicly negate the manufactured narratives about him, the biases displayed by the legal processes that have allowed themselves to be the extension of factional political narratives which are a grand scheme by those who seek to accuse others while they sit in comfort that they will be protected from the exposure that it is they who are the real culprits in capturing the levers of the state. He will speak out against those the legal processes seek to protect at the expense of others.

6. We have also noted with concern that despite not being issued with Rule 3.3 Notices (as an alleged implicated person), our client has been mentioned by other witnesses testifying before the Commission. This is exacerbated by the fact that the Commission now seeks to question our client about some of those witnesses. We kindly request that the Commission respects our client's rights.
7. On the face of your letters, it is not clear to us in terms of which rule you make the request, assuming that your letter is issued in terms of Rule 3.10, we kindly request that you provide us with specific questions which the Chairperson wants our client to respond to, so that our client can meaningfully and comprehensively engage with the Commission's request.
8. All our client's rights are reserved.
9. We await your response.

Yours Faithfully

Mr. L.D. Mantsha

Electronically sent and therefore not signed

137

info

From: Peter P. Pedlar <PeterP@commissionsc.org.za>
Sent: Friday, 31 May 2019 4:10 PM
To: info@lugisanimantshaattorneys.co.za
Cc: Andre A. Lamprecht; Boipelo B. Ratshikana; Shannon S. Van Vuuren
Subject: RE: APPEARANCE OF FORMER PRESIDENT, MR. JACOB ZUMA, BEFORE THE COMMISSION

Dear Yvonne,

Receipt acknowledged, especially paragraph 7, to which we will respond after appropriate internal consultation has been done.

Kind regards

P. Pedlar

Acting Secretary



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From: info@lugisanimantshaattorneys.co.za <info@lugisanimantshaattorneys.co.za>
Sent: Friday, May 31, 2019 3:14 PM
To: Peter P. Pedlar <PeterP@commissionsc.org.za>
Subject: APPEARANCE OF FORMER PRESIDENT, MR. JACOB ZUMA, BEFORE THE COMMISSION
Importance: High

Dear Sir,

Attached please find a letter for your attention.

Kind regards,
Yvonne



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**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

7 June 2019

Lugisani Mantsha Attorneys
1st floor, Burnside Island
Block 6, 410 Jan Smuts Ave,
Craighall, Johannesburg
Att: Mr Dan Mantsha
dan@lugisanimantshaattorneys.co.za

Dear Sirs

Re: Appearance of former President Zuma before the Commission

1. We refer to your letter dated 31 May 2019 which purports to respond to our letters of 30 April 2019 and 6 May 2019. We confirm that we sent you another letter on Thursday 30 May 2019.
2. The Commission sees nothing wrong with any statement it may have made in previous correspondence to the effect that your client had not complied, or, had so far failed to comply, with the Chairperson's request that he furnish the Commission with an affidavit dealing with the evidence of certain witnesses. That statement says nothing about whether the failure is justified or not. It simply states a fact. It is, therefore, difficult for the Commission to understand why stating that fact should be seen by your client as revealing, as you say, the Commission's "antipathy" towards your client.
3. The Commission has never said that your client's election not to apply for leave to cross-examine or to put his version is a sign of non-co-operation. In fact the Chairperson has made it clear in his judgment in the matter concerning Mr Tom Manyane's application for leave to cross-examine Mr Gordhan that an implicated

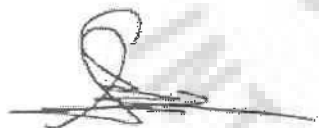
person is entitled to elect not to apply for leave to cross-examine a witness if he so elects.

4. The Commission does not understand your client's complaint in paragraph 4 of your letter about the Chairperson having allegedly "publicly and in an unprecedented way" singled out "your client" for mention. We point out that the terms of reference of this Commission which your client signed when he was still President single out certain people for special mention. Those people include your client. Furthermore, a number of witnesses have mentioned your client. Also, your client was the Head of State during either the years or some of the years when it is alleged that the State was captured. It is therefore inevitable that your client will get mentioned from time to time in the context of the work of the Commission.
5. It is also not clear to the Chairperson what the basis is for your client's view that, because the Chairperson may have mentioned your client's name in regard to the work of the Commission, your client should characterise that as "this politicization of a judicial process" and should find it "unfortunate and deeply disturbing" as your letter says.
6. Paragraph 5 of your letter seems to be open to an interpretation that your client takes the view that this Commission or its Chairperson is biased against him or that this Commission or its Chairperson has allowed itself or himself to be the "extension of factional political narratives which are a grand scheme by those who seek to accuse others while they sit in comfort that they will be protected from the exposure ..." Please advise whether this is your client's view of the Commission or its Chairperson. If it is your client's view, it will be most unfortunate.
7. Please indicate in respect of which witnesses your client did not receive Rule 3.3 notices and these will be furnished. The Commission tries its best to ensure that Rule 3.3 notices are issued to all persons who are implicated or may be implicated by the evidence of a witness.
8. As was indicated in our letter of 30 May 2019, the purpose of your client's appearance before the Commission is:
 - (a) to give him an opportunity to put his side of the story in regard to the matters covered by the witnesses listed in the annexure to that letter, and,
 - (b) to enable the Chairperson and evidence leader to put such questions to him as they may wish to put to him in regard to matters covered by the witnesses' statements and evidence. This is not a case where the Commission would send the questions to your client in advance ahead of him taking the witness stand. It is a case where the questions would be put to your client once he appears before the Commission. The Commission takes the view that all your client needs to know is what the witnesses have said about him in regard to certain issues so that he can prepare himself. The Commission believes that the material that has been sent to your client which includes witnesses' statements or relevant portions thereof is

adequate to enable him to prepare for his appearance before the Commission. The Commission will therefore not be sending any questions in advance.

9. In asking your client to give the Commission a written undertaking that he will appear before it on the days specified in our letter of 30 April 2019, the Commission is not necessarily invoking any specific powers in terms of the Rules at this stage but is simply showing courtesy to your client who is a former President of the country.
10. For what it is worth the Commission wishes to point out to your client that he is not the only person who has been asked to provide the Commission with an affidavit on some issue or issues and to appear before the Commission. The Chairperson also asked President Ramaphosa to furnish an affidavit on some issue and he agreed to do so and the Commission should be receiving it soon. Furthermore, President Ramaphosa has told the Chairperson that he will appear before the Commission. This was after the Chairperson had informed him that it would be important that he do so in due course as he was the Deputy President of the ruling party and the country during some of the years during which it is alleged that acts of state capture occurred.
11. It has become urgent to know whether your client will appear before the Commission on the dates given in our letter of 30 April 2019 as we are now about five weeks away from 15 July 2019. We, therefore request that your client advises us in writing by no later than Wednesday, 12 June 2019, next week whether he will appear before the Commission on those dates.

Yours sincerely



PETER PEDLAR

**Mr Peter Pedlar
Acting Secretary**

**Judicial Commission of Inquiry into Allegations of State Capture, Corruption and
Fraud in the Public Sector Including Organs of State**

141

info@lugisanimantshaattorneys.co.za

From: info@lugisanimantshaattorneys.co.za
Sent: Wednesday, 12 June 2019 17:12
To: 'Peter P. Pedlar'
Subject: APPEARANCE OF FORMER PRESIDENT, MR. JACOB ZUMA, BEFORE THE COMMISSION
Attachments: ZUMA LETTER TO COMMISSION 12 JUNE 2019.pdf
Importance: High

Dear Sir,

Please find attached letter for your attention.

Regards,
Yvonne



LUGISANIMANTSHA ATTORNEYS

✉ info@lugisanimantshaattorneys.co.za ☎ 011 781 0089 🌐 www.lugisanimantshaattorneys.co.za
📍 410 Jan Smuts Ave Durbanville Office Park Block 6

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LUGISANI MANTSHA ATTORNEYS

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Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: info@lugisanimantshaattorneys.co.za |
Box 1127 | Randburg | 2125

Our Ref: Mr. D Mantsha LM0257/18/C

Att: Mr. Perter Pedlar
Acting Secretary
Commission of Inquiry
Per email: PeterP@commissionsc.org.za

And to

Att: Hon. Justice R. Zondo
Chairperson of the Commission of Inquiry
2nd Floor Hillside House
17 Empire Road
Parktown
Johannesburg
2193

And also, by hand

Date: 12 June 2019

"PRIVATE AND CONFIDENTIAL"
"URGENT"

Dear Mr. Pedlar,

**RE: APPEARANCE OF FORMER PRESIDENT, MR. JACOB ZUMA, BEFORE
THE COMMISSION**

1. We refer to your letter of 07 June 2019. We also refer to your letter of 30 May 2019 in which you undertook to respond to our paragraph 7 of our letter dated 31 May 2019, in which we had requested that you state with specificity

the questions and issues the Commission would like our client, former President Zuma, to deal with.

2. Your letter persists with the unfounded suggestion that our client is unwilling to cooperate with the Commission. We reiterate that our client has always cooperated with the Commission.
3. Your letter is replete with veiled threats, condescension and speculations about our client. Since all of those views of yours are irrelevant, we do not wish to respond to them. All your letter does is to confirm our client's trepidation about the partiality of the Commission as recorded in our previous letter.
4. What our client wishes to respond to however, are those issues that pertain to the Commission's request to him, and his subsequent request for the Commission to furnish him with the specific questions and issues you want him to answer.
5. Our client was within his rights to elect whether or not to apply to cross examine any witness or to put a version. Similarly, the Commission is at liberty to make whatever inference it is legally justified to make as a result of our client's election in terms of rule 3.3 of the Commission.
6. It is quite telling that you state in your letter that *"In asking your client to give the Commission a written undertaking that he will appear before it on the days specified in our letter of 30 April 2019, the Commission is not necessarily invoking any specific powers in terms of the Rules at this stage but is simply showing courtesy to your client who is a former President of the country."*

7. Our client has not asked for any courtesy or special treatment but requires that he be treated in terms of set rules and that his election in terms of such rules be respected. Your uncalled for mentioning of what President Cyril Ramaphosa has promised the Commission is irrelevant and does not deserve any response.
8. It is equally unhelpful for you to ask as you do in paragraph 7, that we provide you with the specific instances where our client was not furnished with a Rule 3.3 notice. We find this alarming, to say the least. We cited examples in our previous letter of cases in respect of which we did not receive notices, but the witnesses mentioned and/or implicated our client in their testimony. It is your task to contradict our claim in that regard if your records point to the contrary.
9. Our client finds it unfair that the Commission expects him, having been mentioned by a plethora of its carefully chosen witnesses, to simply present himself without being appraised of the specific questions and issues in respect of which you require him to answer to the Commission. Fairness and logic dictate that if, indeed, the Commission wants our client to assist the Commission meaningfully, he would need to be appraised of the specific areas and questions in respect of which the Commission seeks his assistance, such would require that our client must prepare and collate his own documentation and consult with all the relevant persons he was working with as Head of State. As you correctly stated in your letter, our client was the President of the Republic and not the manager of all the entities and departments about which some witnesses have testified. Accordingly, it is premature and unfair to ask

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him to commit to dates when he does not know the extent of the issues about which he must assist the Commission.

10. Our client shall await your specific issues and questions before he can consider your request and your "courtesy", and all his rights are strictly reserved.

Kind Regards,

Mr. L.D. Mantsha

Transmitted electronically without signature.





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2193

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Email: inquiries@sastatecapture.org.za
Website: www.sastatecapture.org.za

**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

20 June 2019

Lugisani Mantsha Attorneys
1st floor Burnside Island Block 6
410 Jan Smuts Ave
Craighall
Johannesburg

Your ref.: Mr D Mantsha LM0257/18/C

Dear Sirs

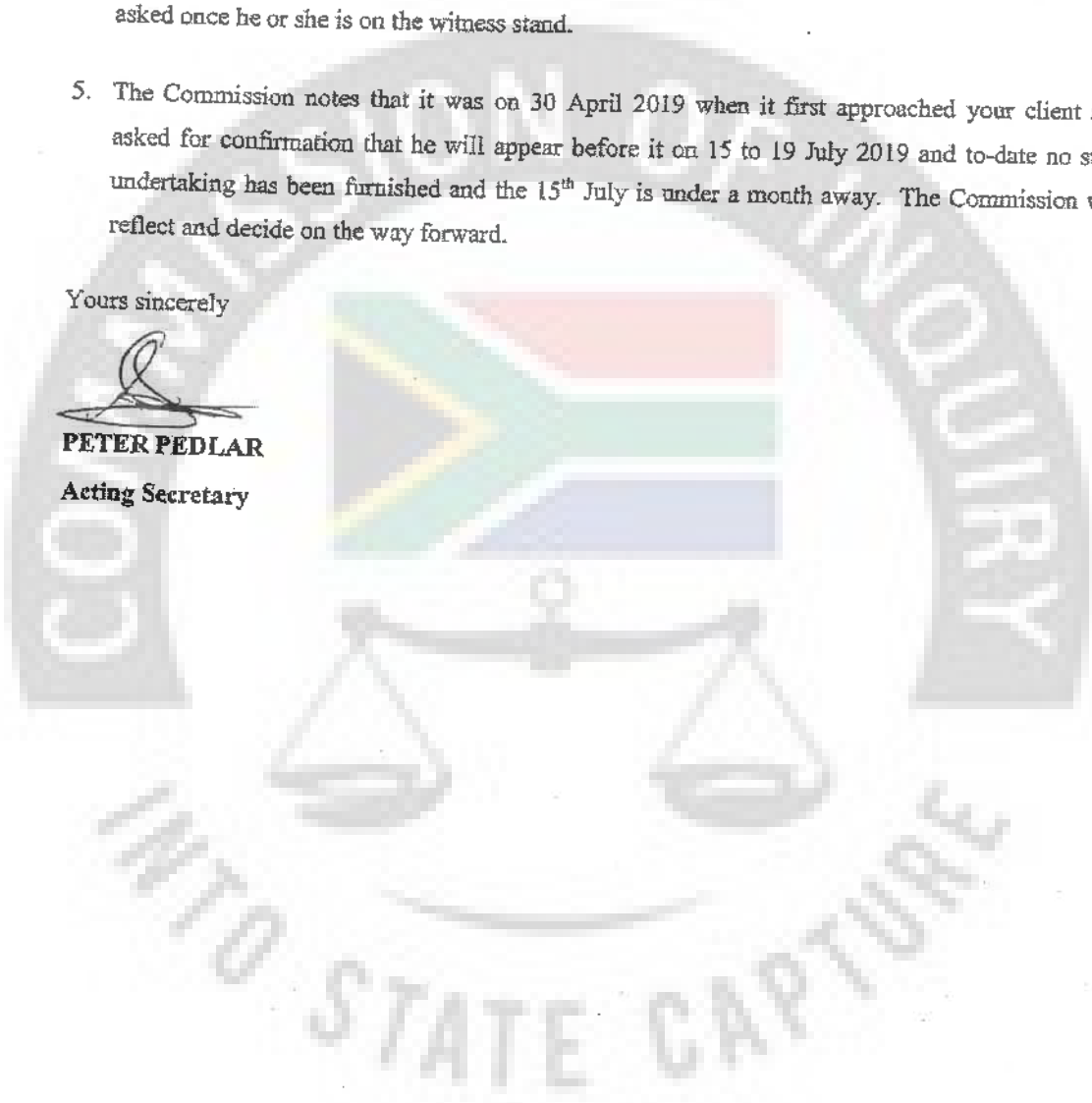
Re: Appearance of former President, Mr JG Zuma before the Commission

1. Your letter of 12 June 2019 refers.
2. The Commission does not intend to respond to many of the statements made in your letter as to do so will not serve any useful purpose.
3. For your client's appearance on 15 to 19 July 2019 the Commission requires your client to testify on the issues or matters covered by the statements or affidavits of the witnesses whose names have been provided to you and in so far as those statements or affidavits refer to, or, relate to, him in one way or another. The questions that he will be asked will also fall within that scope. To the extent that the impression may have been created in previous correspondence that some of the questions could fall outside that scope, it is hereby confirmed that that will not be the case. Accordingly, your client knows what the issues or matters are on which his evidence is required and on which he will be asked questions on the witness stand.

4. The only thing that the Commission is prepared to say with regard to questions that your client will be asked is that it is clear from our letter of 30 April 2019 that he will be asked to provide his version on the issues or matters covered by the statements or affidavits of the witnesses whose names have been provided to you that relate to him or in which he is referred to and, depending on his version, further questions may arise. The Commission does not believe that a witness, including your client, is entitled to take the position that he will not appear before the Commission unless he or she is furnished in advance with all the questions that he or she will be asked once he or she is on the witness stand.
5. The Commission notes that it was on 30 April 2019 when it first approached your client and asked for confirmation that he will appear before it on 15 to 19 July 2019 and to-date no such undertaking has been furnished and the 15th July is under a month away. The Commission will reflect and decide on the way forward.

Yours sincerely


PETER PEDLAR
Acting Secretary



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info@lugisanimantshaattorneys.co.za

From: Boipelo B. Ratshikana <BoipeloR@commissionsc.org.za>
Sent: Monday, 24 June 2019 16:35
To: dan@lugisanimantshaattorneys.co.za; info@lugisanimantshaattorneys.co.za
Subject: Notice in Terms of Rule /Nxasana
Attachments: ZUMA FORMER PRES JACOB nxasana.dotx.pdf; Annexure 'A' - Nxasana Affidavit.pdf

Dear Sir/Madam

Please receive attached Notice in terms of rule 3.3 on behalf of your client Former President Jacob Zuma.

Kind Regards,

Boipelo Ratshikana
Executive Assistant to the Secretary
COMMISSION OF INQUIRY INTO STATE CAPTURE
Hillside House, 2nd Floor, 17 Empire Road, Parktown, Johannesburg, 2193
Tel: 010 214 0651 | Mobile: 071 319 7843 | Email: boipelor@commissionsc.org.za | www.sastatecapture.org.za



149

info@lugisanimantshaattorneys.co.za

From: Boipelo B. Ratshikana <BoipeloR@commissionsc.org.za>
Sent: Tuesday, 25 June 2019 14:29
To: dan@lugisanimantshaattorneys.co.za; info@lugisanimantshaattorneys.co.za
Subject: Notice in Terms of Rule 3.3/Sindane
Attachments: Annexure 'A'.pdf; Annexure 'B'.pdf; ZUMA FORMER PRES JACOB waterkloof tn.pdf

Dear Sir/Madam

Please receive attached Notice in terms of rule 3.3 on behalf of your client Former President Jacob Zuma.

Kind Regards,

Boipelo Ratshikana
Executive Assistant to the Secretary
COMMISSION OF INQUIRY INTO STATE CAPTURE
Hillside House, 2nd Floor, 17 Empire Road, Parktown, Johannesburg, 2193
Tel: 010 214 0651 | Mobile: 071 319 7843 | Email: boipelor@commissionsc.org.za | www.sastatecapture.org.za



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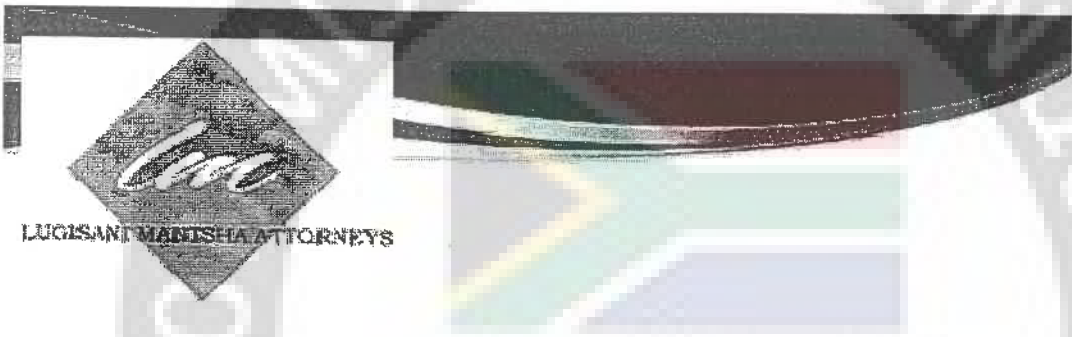
info@lugisanimantshaattorneys.co.za

From: info@lugisanimantshaattorneys.co.za
Sent: Monday, 24 June 2019 15:14
To: 'Peter P. Pedlar'
Subject: APPEARANCE OF FORMER PRESIDENT, MR. JACOB ZUMA, BEFORE THE COMMISSION
Attachments: ZUMA'S REVISED LETTER TO COMMISSION 24 JUNE 2019.pdf
Importance: High

Dear Sir,

Please find attached herewith, the revised letter that we had previously sent today, for your attention.

Regards,
Yvonne



✉ info@lugisanimantshaattorneys.co.za ☎ 011 781 0085 🌐 www.lugisanimantshaattorneys.co.za
📍 410 Jan Smuts Ave Durbanville Office Park Block 6

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LUGISANI MANTSHA ATTORNEYS

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Box 1127 | Randburg | 2125

Our Ref: Mr. D Mantsha LM0257/18/C

Att: Mr. Perter Pedlar
Acting Secretary
Commission of Inquiry
Per email: PeterP@commissionsc.org.za

And to

Att: Hon. Justice R. Zondo
Chairperson of the Commission of Inquiry into State Capture
2nd Floor Hillside House
17 Empire Road
Parktown
Johannesburg
2193

And also, by hand

Date: 24 June 2019

Dear Mr. Pedlar

**RE: APPEARANCE OF FORMER PRESIDENT, MR. JACOB ZUMA, BEFORE
THE COMMISSION**

1. Your letter dated 20 June 2019 is received and acknowledged. We have also taken note of the public press statement the Commission issued on the same date.

2. We hereby advise that our client has decided to grant the Commission its wish or the wishes of those who advise or instruct it. While he reserves all his rights in this regard, former President Zuma will attend the Commission's proceedings of 15 to 19 July 2019.
3. Having made the above undertaking, we do wish, for the record, to reiterate and highlight the following issues of concern:
 - 3.1. Our request to be furnished with specific questions was done in good faith, as envisaged in Rule 3.10, and in order to ensure that our client can assist the Commission fully prepared and thus more meaningfully;
 - 3.2. Your decision to issue a press statement amounts to nothing but a disinformation campaign and an unfortunate attempt at instigating the public against our client. We view this stratagem of naming and shaming our client as unfortunate and constituting a descension into the political arena by the Commission;
 - 3.3. As our previous correspondence bears testimony, our request that you provide us with specific questions was consistently accompanied by an undertaking that our client wishes to cooperate with the Commission. We had hoped that the Commission would find our approach more sensible and would have brought about a much closer approximation to the Commission's mandate (terms of reference) in respect of our client and his true understanding of the issues that pertain to him as the former Head of State;

- 3.4. Your press statement, the Chairperson's previous public comments about our client and the refusal to furnish us with specific questions have all left us with the distinct impression that the Commission views our client as an accused and does not require our assistance in its truth finding mandate. This has also left us with the distinct impression that you seek your own truth and to deliver our client to the Commission for public display and in order to ambush and humiliate him rather than to fulfil the mandate of the Commission as set out in the terms of reference;
- 3.5. This is not what we understood to be your role, and as his legal representatives, we sought to ensure that we assist the Commission in its work. However, you have consistently rejected our offer in this regard. Accordingly, you will have Mr. Zuma on the dates you have unilaterally determined;
- 3.6. Our client remains of the view that the Commission is prejudiced against him and lacks the requisite impartiality.
4. Our client will attend the Commission's proceedings on the dates the Commission has determined. Our client stands by all the concerns he has previously raised with the Commission.
5. We hope the above is in order. Accordingly, you will receive no further correspondence from us in this regard and we wish the Commission well.
6. All our client's rights are reserved.

Kind Regards,

Mr. L.D. Mantsha

Transmitted electronically without signature.



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info@lugisanimantshaattorneys.co.za

From: info@lugisanimantshaattorneys.co.za
Sent: Tuesday, 25 June 2019 17:37
To: 'Boipelo B. Ratshikana'
Subject: RE: Notice in Terms of Rule 3.3/Sindane

Good day,

We acknowledge receipt.

Regards,
Yvonne



✉ info@lugisanimantshaattorneys.co.za ☎ 011 781 0092 🌐 www.lugisanimantshaattorneys.co.za

📍 410 Jan Smuts Ave Burnside Island Office Park Block B

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From: Boipelo B. Ratshikana <BoipeloR@commissionsc.org.za>
Sent: Tuesday, 25 June 2019 14:29
To: dan@lugisanimantshaattorneys.co.za; info@lugisanimantshaattorneys.co.za
Subject: Notice in Terms of Rule 3.3/Sindane

Dear Sir/Madam

Please receive attached Notice in terms of rule 3.3 on behalf of your client Former President Jacob Zuma.

Kind Regards,

Boipelo Ratshikana
Executive Assistant to the Secretary
COMMISSION OF INQUIRY INTO STATE CAPTURE
Hillside House, 2nd Floor, 17 Empire Road, Parktown, Johannesburg, 2193
Tel: 010 214 0651 | Mobile: 071 319 7843 | Email: boipelor@commissionsc.org.za | www.sastatecapture.org.za



info@lugisanimantshaattorneys.co.za

From: info@lugisanimantshaattorneys.co.za
Sent: Wednesday, 26 June 2019 08:40
To: 'Boipelo B. Ratshikana'
Subject: Notice in Terms of Rule /Nxasana

Good day,

We acknowledge receipt.

Kind regards,
 Yvonne



✉ info@lugisanimantshaattorneys.co.za ☎ 011 781 0055 🌐 www.lugisanimantshaattorneys.co.za

📍 410 Jan Smuts Ave Sunningdale Office Park Block 5

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From: Boipelo B. Ratshikana <BoipeloR@commissionsc.org.za>
Sent: Monday, 24 June 2019 16:35
To: dan@lugisanimantshaattorneys.co.za; info@lugisanimantshaattorneys.co.za
Subject: Notice in Terms of Rule /Nxasana

Dear Sir/Madam

Please receive attached Notice in terms of rule 3.3 on behalf of your client Former President Jacob Zuma.

Kind Regards,

Boipelo Ratshikana
 Executive Assistant to the Secretary
 COMMISSION OF INQUIRY INTO STATE CAPTURE
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 Tel: 010 214 0651 | Mobile: 071 319 7843 | Email: boipelor@commissionsc.org.za | www.sastatecapture.org.za

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**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

25 June 2019

Mr Lugisani Mantsha
Lugisani Mantsha Attorneys
First Floor
Burnside Island
Block 6
410 Smuts Avenue
Craighall
Johannesburg

Ref: Mr. D Mantsha LM0257/18/C

email: info@lugisanimantshaattorneys.co.za

Dear Sir

Re: Appearance of former President, Mr Jacob Zuma, before the Commission

1. Your letter of 24 June 2019 refers.
2. The Commission notes the undertaking given by the former President.

Yours sincerely

Mr Peter Pedlar
Acting Secretary

Judicial Commission of Inquiry into Allegations of State Capture, Corruption and Fraud in the
Public Sector including Organs of State



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**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

1 July 2019

Dear Sir / Madam

**THE COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE
("THE COMMISSION") // RULE 3.3 NOTICE**

1. The Rule 3.3 Notice you received in respect of the evidence of Mr. Mxolisi Sandile Oliver Nxasana ("Nxasana") refers. You have been notified of the allegations made against you relative to Nxasana's evidence.
2. Please be advised that due to a change in calendar arrangements, the hearing of Mr. Nxasana's evidence has been postponed and will no longer occur on the 9th July 2019. Mr. Nxasana will be appearing before the Commission on a later date to be confirmed, which date will be communicated to you in due course.
3. Regarding the scheduling of Nxasana's evidence, please keep abreast of any announcements on the Commission's website (www.sastatecapture.org.za) and in the media in this regard. Your continued cooperation is appreciated.

Yours faithfully,

Mr. Peter Pedlar - Acting Secretary

**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

info

From: Peter P. Pedlar <PeterP@commissionsc.org.za>
Sent: Monday, 01 July 2019 12:44 PM
To: info@lugisanimantshaattorneys.co.za
Cc: Veruschka V. September; Derick de Beer; Boipelo B. Ratshikana; Ouma Thagane
Subject: Additional documents

Dear Mr Mantsha,

My telcon with Yvonne at 12 noon today refers, requesting details of your mobile number.

The Commission will be sending a large volume of information, both by hard copy as well as electronically to your office, for the attention of your client, former President JG Zuma.

Since the files are too large to send by email, the Commission will save it in the Cloud, and will provide you with a hyperlink to enable you to access the documents. In order to preserve the confidentiality of said documents, these will be password protected. The password to access these documents will be sent securely to your mobile phone. It is for this reason that I called your offices earlier to request your mobile number, which I don't know.

Please would you be so kind to provide me with your mobile number so that I can in turn send you the password via sms to enable you to access the soft copies electronically.

Kind regards

P. Pedlar

Acting Secretary



COMMISSION OF INQUIRY INTO STATE CAPTURE | Hillside House, 3rd Floor, 17 Empire Road, Parktown,
Johannesburg, 2193 | Gauteng | South Africa | email: secretary@commissionsc.org.za | www.sastatecapture.org.za; |
Mobile +27(0)71320 8293

160



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**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

01 July 2019

Lugisani Mantsha Attorneys
1st floor, Burnside Island
Block 6, 410 Jan Smuts Ave,
Craighall, Johannesburg
Att: Mr Dan Mantsha
dan@lugisanimantshaattorneys.co.za

Dear Sirs

RE: STATEMENTS OF WITNESSES

We deliver herewith two lever-arch files containing the statements of the witnesses referred to in our letter of 6 May 2019 for you and your client's convenience and also in case there is any one of the statements that you may not have received.

Your sincerely

Mr Peter Pedlar
ACTING SECRETARY:
Judicial Commission of Inquiry into Allegations of State Capture, Corruption and Fraud
in the Public Sector including Organs of State

"JYZ 161"



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**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

30 July 2019

Dear Advocate Sikhakhane,

By email: muzis@law.co.za

muzi@pabasa.co.za

RE: FORMER PRESIDENT ZUMA: AREAS OF INTEREST

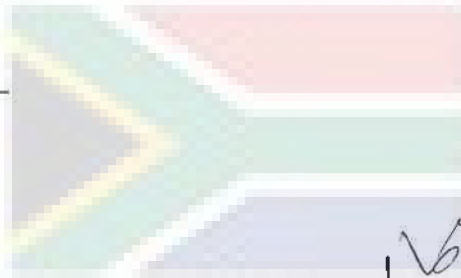
1. I refer to the statement of the Chair of the State Capture Commission that was placed on record during the hearing of Friday, 19 July 2019, recording the agreement reached between him and Counsel for the Commission and Mr Zuma respectively on procedural steps to be followed.
2. Consequently, I set out in the schedule attached hereto marked 'A', the particular 'areas of interest' identified in respect of the testimony of nine of the witnesses who have given evidence concerning Mr Zuma, as well general matters arising therefrom.
3. In regard to these 'areas of interest' further details may be obtained from the statements and documentation already provided to your attorney.
4. It is expected that further documentation relevant to these 'areas of interest' and the related general matters will be introduced into evidence either before or when Mr Zuma returns to testify before the Commission. Such documentation will be provided to your attorney when the Commission is in a position to do so, affording Mr Zuma a reasonable time for preparation before being asked questions in regard thereto.

5. It is also the intention to ask Mr Zuma questions regarding matters raised by other witnesses who have testified or will testify before the Commission. Further details and documentation in that regard will be provided to your attorney in due course.
6. We note that it has been agreed that Mr Zuma will provide the Commission with a statement or statements dealing with the 'areas of interest' identified by the Commission's Legal Team before he returns to the Commission to give evidence.
7. As agreed, we will meet as soon as we are both available to agree a mutually convenient timetable for the above. Should we be unable to reach agreement on any procedural issue in this regard, the matter will be referred to the Chair for a ruling.
8. Finally the Chair has directed that Mr Zuma should return to give evidence from 14 October to 25 October 2019 and then from 11 November to 15 November 2019.

Yours faithfully,

P.P.

Paul Pretorius
Head of the Legal Team
State Capture Commission





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Johannesburg
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Email: inquiries@sastatecapture.org.za
Web: www.sastatecapture.org.za

**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

30 July 2019

Dear Mr. JG Zuma,

c/o: **Lugisanf Mantsha Attorneys**

Per e-mail: info@lugisanimantshaattorneys.co.za; and

dan@lugisanimantshaattorneys.co.za

**THE COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE
("THE COMMISSION") // RULE 3.3 NOTICE**

1. The Rule 3.3 Notice you received in respect of the evidence of Mr. Mxolisi Sandile Oliver Nxasana refers.
2. You have previously been notified of the allegations made against you in terms of Mr. Nxasana's evidence.
3. Please be advised that due to a change in calendar arrangements, Mr. Nxasana will be again be appearing before the Commission on 19 August 2019.
4. You are reminded that in terms of Rule 3.3.4 of the Rules Governing Proceedings of the Commission, that you are invited to attend on the Commission on the date mentioned above, should you so choose.
5. For the avoidance of doubt, the hearing of the evidence of Mr. Nxasana will take place at or as close as possible to 10am on the 19th of August 2019 at 4th Floor, Hill on Empire, 16 Empire Road, Parktown, Johannesburg.

6. Please contact Mr. Warren Redcliffe (warrenr@commissionsc.org.za) if you have any queries.

Yours faithfully,



Ms. Kwezi Brigitte Shabalala - Acting Secretary

JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE



info@lugisanimantshaattorneys.co.za

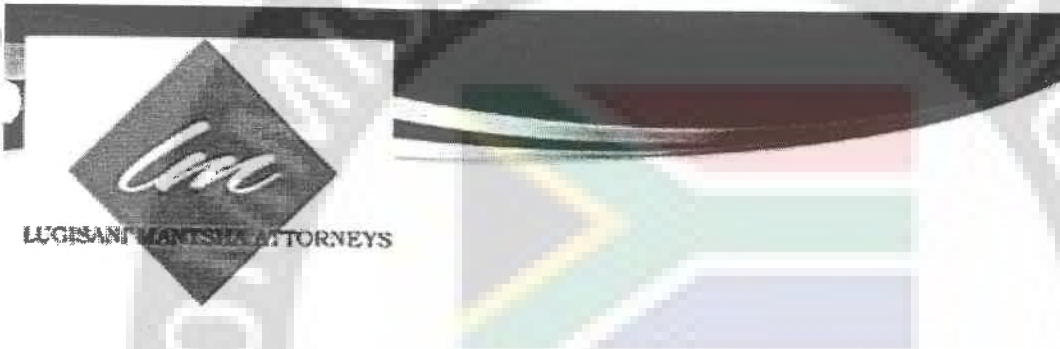
From: info@lugisanimantshaattorneys.co.za
Sent: Friday, 16 August 2019 11:41
To: 'Boipelo B. Ratshikana'; 'Ppretorius@commissionsc.org.za'; 'Shannon S. Van Vuuren'
Subject: FORMER PRESIDENT, MR. JACOB ZUMA - AREAS OF INTEREST
Attachments: ZUMA LETTER TO THE COMMISSION 16 AUGUST 2019.pdf

Dear Sir/Madam,

Attached please find a letter for your attention.

Kindly acknowledge receipt hereof.

Kind regards,
 Yvonne



✉ info@lugisanimantshaattorneys.co.za ☎ 011 781 6096 🌐 www.lugisanimantshaattorneys.co.za

📍 410 Jan Smuts Ave Burnside Island Office Park Block E

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LUGISANI MANTSHA ATTORNEYS

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Box 1127 | Randburg | 2125 |

Our Ref: Mr. D Mantsha LM0257/18/C

Att: Ms K B Shabalala
Acting Secretary
Commission of Inquiry
Per email: BoipeloR@commissionsc.org.za

Att: Adv Pretorius SC
Commission of Inquiry

Per email: Ppretorius@commissionsc.org.za
ShannonV@commissionsc.org.za

Date: 16 August 2019

PRIVATE AND CONFIDENTIAL
"URGENT"

Dear Mr. Pretorius,

RE: FORMER PRESIDENT, MR. JACOB ZUMA - AREAS OF INTEREST

1. We refer to your letter of 30 July 2019 and your various communication with Advocate Muzi Sikhakhane SC in relation to the appearance of the former President Mr. Zuma ("our Client / Mr. Zuma") before the Commission. Your letter follows a directive publicly made by the chairperson of the Commission regarding the way forward.

2. The Chairperson's publicly stated way forward is captured as follows in the record:

"I have had a discussion with counsel for the former President and counsel for the – from the Commission's legal team ... the former President, I've been told, has indicated that he wishes to continue to cooperate with this Commission and his legal team also wish to continue to work with this Commission...."

It has been agreed that the way in which the former President's concerns may be taken care of is that the Commission's legal team will indicate to his legal team what the Commission's areas of interest are in each witnesses statement or affidavit on which the Commission or they would like the former President to testify and that thereafter the former President will then provide, thorough his legal team, statements that indicate what he has to say on the incidents or areas of interest that will have been pointed out by the Commission's legal team in regard to each witnesses statement or affidavit.

This helps because sometimes in one statement, a witness deals with a number of things, some of which may have nothing to do with the former President but there may be areas where the Commission's legal team wishes to hear what he knows, or what he has to say.

The agreement is that counsel, certainly the lead counsel but counsel for the former President will meet within the next – before the end of the next two weeks with a view to the Commission's legal team, making available to the former President's counsel a document that indicates exactly which areas in the various affidavits of witnesses they would like the former President to give information about. The two teams, counsel will agree the timeframes – the timeframe within which the former President's counsel will provide the former President's statements in regard to the specific areas of interest that will have been indicated in regard to the specific affidavits of the witnesses concerned. If the two sides are not able to agree on the timeframe, they will approach me and I will hear both sides and make a decision on the timeframe.

It is contemplated within this agreement that at a certain stage – that at a certain stage the former President will come back and give evidence and it is contemplated that with the process that has been agreed to by all sides, it may well be that the time that he will need to testify might be shorter, might be shortened because of the exchange of information that will have happened including statements, affidavits from the former President."

3. It was our understanding of the agreement that central to the exercise was that you would indicate to us which areas you wished Mr. Zuma to cover or respond to. However, it is our recollection and is confirmed by the record that the time frames for Mr. Zuma to answer or provide his version to the Commission were to be agreed between yourself and our counsel, having regard to the scope of the issues as well as the consultations that may be required. We are in the process of responding to the issues raised in your letter of 30 July 2019 to Sikhakhane SC. We are surprised by the unilateral directive in this regard as it flies in the face of the agreement and the co-operative spirit that underpinned it.

4.

"...It is contemplated within this agreement that at a certain stage – that at a certain stage the former President will come back and give evidence and it is contemplated that with the process that has been agreed to by all sides, it may well be that the time that he will need to testify might be shorter, might be shortened because of the exchange of information that will have happened including statements, affidavits from the former President"

[Own emphasis]

5. In this regard, we kindly request that you bring this to the Chairperson's attention. We suggest that the dates being directed by the Chairperson serve as mere recommendation and/or proposal. In other words, we request that they be treated as non-binding targets and with the possibility of either party to request an extension should same be necessary.

6. In the circumstances, please let us know whether the Chairperson is receptive of our correction about the terms of the process of engagement and whether he is amenable to our proposal.

7. We look forward to hearing from you.
8. Our client's right remains reserved.

Kind Regards,

Mr. L.D. Mantsha

Transmitted electronically without signature.





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**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

28 August 2019

To: Lugisani Mantsha Attorneys (Attention: Mr. Dan Mantsha)

E-mail: info@lugisanimantshaattorneys.co.za

Dear Sirs

**RE: FORMER PRESIDENT JACOB ZUMA ("YOUR CLIENT") // EVIDENCE OF ANGELO
AGRIZZI**

1. We refer to the letter dated 17th July 2019, sent via email to yourselves on Thursday, 18th July 2019.
2. We note that, at the time the abovementioned letter was sent to yourselves, your client had accepted the Chairperson's invitation to appear before the Commission and had availed himself from the 15th to 19th July 2019 in order to give his testimony at the Commission regarding the various allegations levelled against him by certain witnesses, including Mr. Angelo Agrizzi.
3. In this context, the letter was sent in error and we apologise therefore and hereby confirm that the Commission hereby formally withdraws this abovementioned letter, dated 17th July 2019.

Yours faithfully,

**Ms Brigitte Shabalala - Acting Secretary
JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**



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**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

17 July 2019

Former President Jacob Zuma
c/o Lugisani Mantsha Attorneys

Email: dan@lugisanimantshaattorneys.co.za

Dear Mr Zuma

BOSASA: EVIDENCE OF MR ANGELO AGRIZZI

- 1 You were implicated during the testimony of Mr Angelo Agrizzi ("Mr Agrizzi") before the Commission of Inquiry into Allegations of State Capture, Corruption and Fraud in the Public Sector including Organs of State ("the Commission").
- 2 A Notice in terms of Rule 3.3 of the Rules of the Commission was subsequently sent to you.
- 3 We have not received an application from you to cross-examine Mr Agrizzi or your response to the allegations made by Mr Agrizzi which implicate you.
- 4 Therefore we require to meet with you with the purpose to obtain your written explanation in a statement form in response to the allegations against you.
- 5 You may provide us with your own written statement under oath which may be made with the assistance of your legal advisor, if any. Alternatively we will assist you with compiling your statement at a time and place convenient to you.

Yours sincerely

MS K B SHABALALA
Acting Secretary
Judicial Commission of Inquiry into Allegations
of State Capture, Corruption and Fraud
in the Public Sector including Organs of State

info@lugisanimantshaattorneys.co.za

From: info@lugisanimantshaattorneys.co.za
Sent: Wednesday, 28 August 2019 17:13
To: 'Boipelo B. Ratshikana'
Subject: RE: Letter to Lugisani Mantsha Attorneys

Good day,

We acknowledge receipt of your letter.

Kind regards,
Yvonne



LUGISANI MANTSHA ATTORNEYS

✉ info@lugisanimantshaattorneys.co.za ☎ 011 751 0093 🌐 www.lugisanimantshaattorneys.co.za

📍 410 Jan Smuts Avenue, Durbanville Office Park, Block 5

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From: Boipelo B. Ratshikana <BoipeloR@commissionsc.org.za>
Sent: Wednesday, 28 August 2019 15:22
To: info@lugisanimantshaattorneys.co.za; dan@lugisanimantshaattorneys.co.za
Subject: Letter to Lugisani Mantsha Attorneys

Dear Sirs

Please find attached letter for your attention and kindly acknowledge receipt.

Kind Regards,

Boipelo Ratshikana
Executive Assistant to the Secretary
COMMISSION OF INQUIRY INTO STATE CAPTURE
Hillside House, 2nd Floor, 17 Empire Road, Parktown, Johannesburg, 2193
Tel: 010 214 0651 | Mobile: 071 319 7843 | Email: boipelor@commissionsc.org.za | www.sastatecapture.org.za

info@lugisanimantshaattorneys.co.za

From: info@lugisanimantshaattorneys.co.za
Sent: Wednesday, 04 September 2019 11:32
To: 'Boipelo B. Ratshikana'; 'Shannon S. Van Vuuren'; 'Ppretorius@commissionsc.org.za'
Subject: FORMER PRESIDENT, MR. JACOB ZUMA
Attachments: Letter to Adv Pretorius 04 SEP 2019.pdf

Dear Sir/Madam,

Please find attached hereto a letter for your attention.

Kind regards,
 Yvonne



LUGISANIMANTSHA ATTORNEYS

✉ info@lugisanimantshaattorneys.co.za ☎ 015 781 0099 🌐 www.lugisanimantshaattorneys.co.za

📍 410 Jan Smuts Avenue, Burnside Island Office Park Block B

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LUGISANI MANTSHA ATTORNEYS

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Box 1127 | Randburg | 2125

Our Ref: Mr. D Mantsha LM0257/18/C

Att: Ms. K B Shabalala
Acting Secretary
Commission of Inquiry
Per email: BoipeloR@commissionsc.org.za

Att: Adv Pretorius SC
Commission of Inquiry
Per email: Ppretorius@commissionsc.org.za
And to: ShannonV@commissionsc.org.za



Date: 04 September 2019

"PRIVATE AND CONFIDENTIAL"

"URGENT"

Dear Adv Pretorius,

RE: FORMER PRESIDENT, MR. JACOB ZUMA

1. We refer to our previous correspondence of 16 August 2019.
2. We also refer to the discussions between our senior counsel and Mr Paul Pretorius in which our senior counsel made an undertaking that we would revert back to the Commission regarding former President Zuma's testimony.
3. We have taken instructions in the attempt to ascertain the time we require to furnish the Commission with our comments on its questions and our client's answers thereto.

4. However, while we are engaged in this exercise which was a directive from the Chairperson, there has been a series of intervening events that affect our client's testimony and/or continued participation in and assistance to this important Commission. These events are inter alia as follows:
 - 4.1. subsequent to our client's testimony in which he responded to the evidence of Mr Themba Maseko, we were surprised that the Commission had obtained or invited a witnesses, Messrs Brett Simons and Hlungwani, whose hearsay evidence sought to rebut the evidence already given by our client in response to what he thought was a complete case against him in that respect. Our senior counsel also advised us that Pretorius SC confirmed that the dates which were stated in your previous letter as directives from the Chairperson were estimates rather than fixed date. We are happy with that clarification.
 - 4.2. On 08 August 2019 our client was sued by Mr Hanekom making reference to our client's testimony at the Commission;
 - 4.3. We have been contacted by attorneys of Mr Sipiwe Nyanda who informed us that a summons has been issued against our client for defamation based on our client's testimony to the Commission;
 - 4.4. Mr Ngoako Ramatlhodi has also threatened to issue summons suing our client for his testimony before the Commission.
5. Two difficulties arise from the above issues. First, given the testimony of Simons and Hlongwane it is clear to us that the Commission had not obtained the totality of its case against our client in respect of Mr Maseko's accusations. Accordingly, it is our respectful view that the process would be better served if our client was called at the end of the process so that he can comprehensively respond to a complete case against him. The calling of Messrs Simons and Hlungwani clearly demonstrate the futility of calling our client to respond to incomplete evidence

relating to one allegation. It is also unfair to both our client and the Commission to approach his evidence on such a piecemeal basis.

6. Second, we consider the court applications and threats thereof to constitute an interference with our client's incomplete testimony. The lawsuits which are based on his evidence or anticipated evidence do not only intimidate our client but undermine the work of the Commission.
7. We were in the process of compiling a comprehensive answer to the questions based on instructions from our client when we received notices that further two witnesses had been called in respect of Mr Maseko's testimony.
8. We regard the lawsuits which are based on the incomplete testimony of our client as irremediable prejudice to him.
9. In the light of the above, we make the following proposal. To avoid the inconvenience and costs of our client coming in and out of the Commission to respond to the same allegations, we propose that our client should rather be called at the end of all the evidence which implicates him. Our client is concerned that his continued testimony is being impeded by the lawsuits which are filed even before he has completed his testimony before the Commission.
10. We cordially invite the Commission to provide our client with a mechanism that will protect him from being sued before he can complete his evidence.
11. We await your favourable response.
12. Our client's rights remain reserved.

Yours Faithfully,

Mr. L.D. Mantsha

Transmitted electronically without signature.



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**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

10 September 2019

Our reference: Ms. B.K Shabalala / Ms. L. Buthelezi

To: **Mr. Daniel Mantsha**
C/o: **Lugisani Mantsha Attorneys**
By email: dan@lugisanimantshaattorneys.co.za and
Copy to: info@lugisanimantshaattorneys.co.za
Re: **Evidence: Former President J.G. Zuma**

Dear Sir,

**THE COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE
("THE COMMISSION")**

1. Deputy-Chief Justice Zondo has requested a meeting with your counsel and Advocate Pretorius SC at the hearing venue of the Commission at 16h30 on Wednesday 11 September 2019.
2. Please confirm your counsel's attendance at the proposed meeting.

Yours faithfully,

Ms. Brigitte K. Shabalala

Acting Secretary

**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

info@lugisanimantshaattorneys.co.za

From: info@lugisanimantshaattorneys.co.za
Sent: Tuesday, 10 September 2019 17:53
To: 'Boitumelo Leputu'; 'Warren Redcliffe'; 'Shannon S. Van Vuuren';
 'Ppretorius@commissionsc.org.za'
Subject: THE COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE,
 CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE
 ("THE COMMISSION")
Attachments: Letter to the Commissoin 10 SEP 2019.pdf

Dear Sir/Madam,

Please find attached hereto a letter for your urgent attention.

Kindly acknowledge receipt hereof.

Kind regards,
 Yvonne



✉ info@lugisanimantshaattorneys.co.za ☎ 011 731 0003 🌐 www.lugisanimantshaattorneys.co.za

📍 470 Jan Smuts Ave Sandton Island Office Park Block B

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Box 1127 | Randburg | 2125

Our Ref: Mr. D Mantsha LM0257/18/C

Your ref: Ms B.K Shabalala / Ms L. Buthelezi
Att: Ms. K B Shabalala
Acting Secretary
Commission of Inquiry
Per email: BoipeloR@commissionsc.org.za

Att: Adv Pretorius SC
Commission of Inquiry
Per email: Ppretorius@commissionsc.org.za
And to: ShannonV@commissionsc.org.za

Date: 10 September 2019

PRIVATE AND CONFIDENTIAL
"URGENT"

Dear Sir,

RE: THE COMMISSION OF INQUIRY INTO ALLEGATION OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE ("THE COMMISSION")

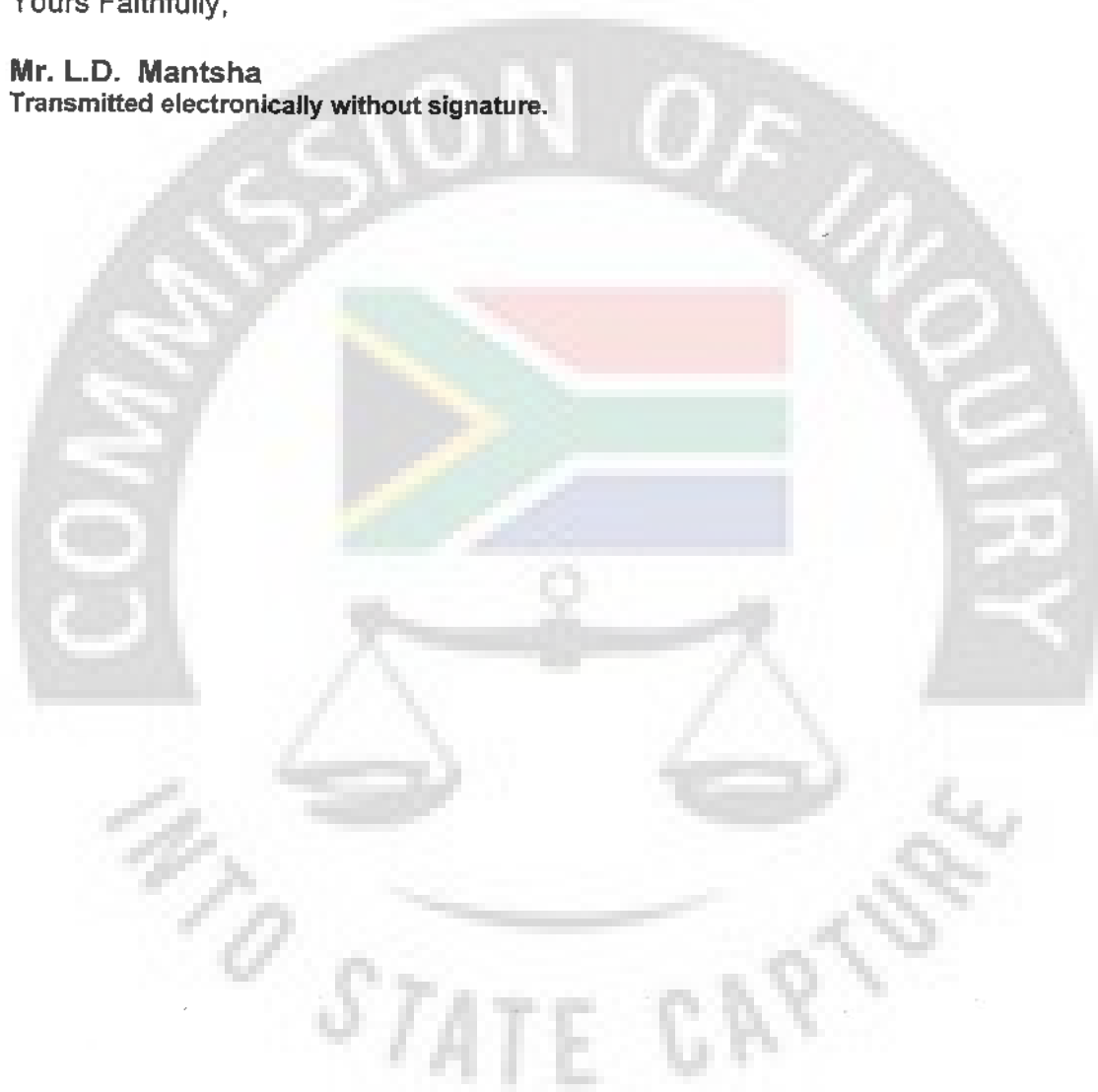
1. We acknowledge receipt of your letter in which you stated that the Chairperson requests a meeting with counsel.
2. As the attorneys of record in this matter we would appreciate a notice on the issue for discussion, so that we can take instructions from our client.

3. As things stand and upon receipt of the agenda, our Mr Mantsha is available to attend the meeting as requested.
4. We await your response regarding the agenda.

Yours Faithfully,

Mr. L.D. Mantsha

Transmitted electronically without signature.





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**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

10 September 2019

Our reference: Ms. B.K. Shabalala / Ms. L. Buthelezi

To: **Mr. Daniel Mantsha**
C/o: **Lugisani Mantsha Attorneys**
By email: dan@lugisanimantshaattorneys.co.za; and
Copy to: info@lugisanimantshaattorneys.co.za
Re: **Evidence: Former President J.G. Zuma**

Dear Sir,

**THE COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE
("THE COMMISSION")**

1. Your letter dated 23 August 2019 to Advocate Paul Pretorius SC refers.
2. It is hereby confirmed that the dates that have been set aside for the next appearance of the former President before the Commission are 14 October 2019 to 25 October 2019; and 11 November 2019 to 15 November 2019.
3. In so far as your letter seeks to find out whether those dates are binding, I am directed by the Chairperson to advise that the dates have been determined by the Chairperson and stand unless changed by him, which he has power to do if sound and cogent reasons are furnished to him to do so. However, in this regard one of the factors that the Chairperson will take into account, together with other

relevant factors, is that, as things presently stand, the Commission's lifespan goes up to the end of February 2020.

Yours faithfully.



Ms. Brigitte K. Shabalala

Acting Secretary

**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**





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**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

11 September 2019

Your Ref: Mr. D. Mantsha LM0257/18/C

Our Ref: Ms. BK Shabalala / Ms. L. Buthelezi

To: **Mr. Daniel Mantsha**
By email: dan@lugisanimantshaattorneys.co.za
Copy to: info@lugisanimantshaattorneys.co.za
Re: **Evidence: Former President J.G. Zuma**

Dear Mr. Mantsha,

**RE: THE COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE
("THE COMMISSION")**

1. Your letter dated 10 September 2019 has reference.
2. The meeting proposed for today at 16h30 with the Deputy Chief Justice ("DCJ") and Adv. Pretorius was requested at the DCJ's instance and no agenda has been provided by him to the Secretariat.
3. Please confirm your attendance at the meeting with the DCJ this afternoon at 16h30 as a matter of urgency.

Yours faithfully,

Brigitte Shabalala

Acting Secretary

**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

info

From: info <info@lugisanimantshaattorneys.co.za>
Sent: Wednesday, 11 September 2019 12:40 PM
To: 'Warren Redcliffe'; 'dan@lugisanimantshaattorneys.co.za'
Cc: 'Andre J. Lamprecht'; 'Shannon S. Van Vuuren'; 'Sabina Lech'; 'Samukelisiwe Jali'; 'Boipelo B. Ratshikana'
Subject: RE: Judicial Commission of inquiry into allegations of State Capture // Your client: Mr. JG Zuma

Importance: High

Dear Sirs

We confirm that Mr Mantsha will attend the meeting as requested at 16h30 today the 11 September 2010.

Yours faithfully

Yvonne

From: Warren Redcliffe <WarrenR@commissionsc.org.za>
Sent: Wednesday, 11 September 2019 12:05 PM
To: dan@lugisanimantshaattorneys.co.za; info@lugisanimantshaattorneys.co.za
Cc: Andre J. Lamprecht <AndreL@commissionsc.org.za>; Shannon S. Van Vuuren <ShannonV@commissionsc.org.za>; Sabina Lech <SabinaL@commissionsc.org.za>; Samukelisiwe Jali <SamukelisiweJ@commissionsc.org.za>; Boipelo B. Ratshikana <BoipeloR@commissionsc.org.za>
Subject: Judicial Commission of inquiry into allegations of State Capture // Your client: Mr. JG Zuma

Dear Sirs.

Please find correspondence attached hereto for your urgent attention.

Yours faithfully.

Warren Redcliffe

COMMISSION OF INQUIRY INTO STATE CAPTURE

Hillside House, 17 Empire Road, Parktown,

Johannesburg, 2193 | Gauteng | South Africa |

Email: warrenr@commissionsc.org.za | www.sastatecapture.org.za



info@lugisanimantshaattorneys.co.za

From: Warren Redcliffe <WarrenR@commissionsc.org.za>
Sent: Wednesday, 11 September 2019 12:57
To: info; dan@lugisanimantshaattorneys.co.za
Cc: Andre J. Lamprecht; Shannon S. Van Vuuren; Sabina Lech; Samukelisiwe Jali; Boipelo B. Ratshikana
Subject: RE: Judicial Commission of inquiry into allegations of State Capture // Your client: Mr. JG Zuma

Dear Sirs.

We acknowledge receipt of this e-mail and note the contents thereof.

Yours faithfully,

Warren Redcliffe

From: info <info@lugisanimantshaattorneys.co.za>
Sent: Wednesday, 11 September 2019 12:40
To: Warren Redcliffe <WarrenR@commissionsc.org.za>; dan@lugisanimantshaattorneys.co.za
Cc: Andre J. Lamprecht <AndreL@commissionsc.org.za>; Shannon S. Van Vuuren <ShannonV@commissionsc.org.za>; Sabina Lech <SabinaL@commissionsc.org.za>; Samukelisiwe Jali <SamukelisiweJ@commissionsc.org.za>; Boipelo B. Ratshikana <BoipeloR@commissionsc.org.za>
Subject: RE: Judicial Commission of inquiry into allegations of State Capture // Your client: Mr. JG Zuma
Importance: High

Dear Sirs

We confirm that Mr Mantsha will attend the meeting as requested at 16h30 today the 11 September 2010 .

Yours faithfully

Yvonne

From: Warren Redcliffe <WarrenR@commissionsc.org.za>
Sent: Wednesday, 11 September 2019 12:05 PM
To: dan@lugisanimantshaattorneys.co.za; info@lugisanimantshaattorneys.co.za
Cc: Andre J. Lamprecht <AndreL@commissionsc.org.za>; Shannon S. Van Vuuren <ShannonV@commissionsc.org.za>; Sabina Lech <SabinaL@commissionsc.org.za>; Samukelisiwe Jali <SamukelisiweJ@commissionsc.org.za>; Boipelo B. Ratshikana <BoipeloR@commissionsc.org.za>
Subject: Judicial Commission of inquiry into allegations of State Capture // Your client: Mr. JG Zuma

Dear Sirs.

Please find correspondence attached hereto for your urgent attention.

Yours faithfully,

Warren Redcliffe
 COMMISSION OF INQUIRY INTO STATE CAPTURE



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**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

11 September 2019

Our reference: Ms. B.K Shabalala / Ms. L. Buthelezi

To: **Mr. Daniel Mantsha**
C/o: **Lugisani Mantsha Attorneys**
By email: dan@lugisanimantshaattorneys.co.za and
Copy to: info@lugisanimantshaattorneys.co.za
Re: **Evidence: Former President J.G. Zuma**

Dear Sir,

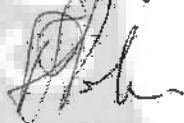
**RE: THE COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE
("THE COMMISSION")**

1. I have been requested by the Chairperson, Deputy Chief Justice Zondo, to respond to certain matters raised in your letter dated 04 September 2019 addressed to me and the Acting Secretary of the Commission.
2. In your letter under reply you state that you were advised by your senior counsel that I had "confirmed that the dates which were stated in your (Pretorius') previous letter as directives from the Chairperson were estimates rather than fixed dates".
3. It is incorrect to state that the said dates were "estimates rather than fixed". Nor did I communicate to your counsel in these terms.
4. I have since spoken to your counsel to confirm that while I cannot recall my precise words I did not communicate to him what you have recorded. What I did

communicate was that the Chairperson would consider amendments to those dates on application to him.

5. It is of course correct that it is the Chairperson's directive that three weeks are required to complete this phase of the former president's testimony.
6. In regard to the matters raised by you in paragraph 4 of your letter under reply, there is nothing that the Commission can do to prevent the former president being sued for defamation. No doubt the former president will seek his own legal advice in that regard.
7. When the former president returns to the Commission to testify he will be required to answer questions concerning the evidence of witnesses who have already testified. You will be given timeous notice of further matters in respect of which the former president's response will be sought.
8. Further, the Chairperson still requires that you respond to the issues raised in the letter addressed to your counsel ("areas of interest") dated 03rd July 2019.

Yours faithfully,



Adv. P.J. Pretorius SC.

JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE



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**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

13 September 2019

Our reference: Ms. B K. Shabalala; Ms. L. Buthelezi; Adv PJ Pretorius SC

To: Mr Daniel Mantsha
Lugisani Mantsha Attorneys

By email: dan@lugisanimantshaattorneys.co.za

Copy to: info@lugisanimantshaattorneys.co.za

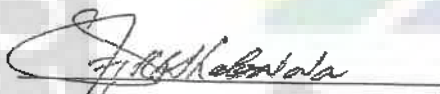
Dear Sir,

RE: Evidence: Former President J.G. Zuma

1. Previous correspondence in this matter refers.
2. The Deputy Chief Justice called for a meeting to take place between himself, Advocate Pretorius and Advocate Sikhakhane. You were welcome to attend the meeting together with your counsel. The meeting was scheduled for Wednesday 11 September 2019.
3. Despite your attendance at the arranged time and venue for the meeting, the meeting did not proceed. The reason for this was that the invitation had been directed to your counsel. He did not attend.

4. We apologize for any inconvenience that may have been caused to you.
5. The Deputy Chief Justice had requested the legal team to establish whether you have informed your client of the dates of his expected appearance before the Commission, that is, from 14 October 2019 to 25 October 2019 and from 11 November 2019 to 15 November 2019.
6. Please confirm that your client will attend at the Commission on the above dates.

Yours faithfully

A handwritten signature in black ink, appearing to read 'B K Shabalala', is written over a horizontal line.

MS B K SHABALALA

Acting Secretary

**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE
CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR
INCLUDING ORGANS OF STATE**

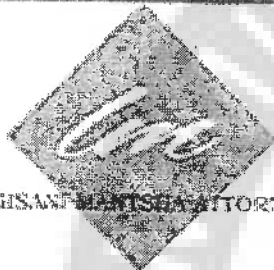
info@lugisanimantshaattorneys.co.za

From: info@lugisanimantshaattorneys.co.za
Sent: Tuesday, 17 September 2019 09:46
To: 'Boipelo B. Ratshikana'; 'Shannon S. Van Vuuren'; 'Ppretorius@commissionsc.org.za'
Subject: THE COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF THE STATE ("THE COMMISSION")
Attachments: Letter to the Commission dated 12 September 2019.pdf

Dear Sir/Madam,

Please find attached hereto a letter for your attention.

Kind regards,
Yvonne



LUGISANIMANTSHA ATTORNEYS

info@lugisanimantshaattorneys.co.za | 011 491 1031 | www.lugisanimantshaattorneys.co.za

401 Ave. Brimley, Toronto, Ontario, M6G 1B5

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Box 1127 | Randburg | 2125 |

Our Ref: Mr. D Mantsha LM0257/18/C

Your Ref: Ms B.K Shabalala / Ms L. Buthelezi
Att: Ms. B.K Shabalala
Acting Secretary of the Commission of Inquiry
Per email: BoipeloR@commissionsc.org.za

Att: Adv Pretorius SC
Per email: Ppretorius@commissionsc.org.za
And to: ShannonV@commissionsc.org.za

Date: 12 September 2019

PRIVATE AND CONFIDENTIAL
(URGENT)

Dear Sir/Madam,

RE: THE COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF THE STATE ("THE COMMISSION")

1. We refer to your letter dated 11 September 2019.
2. We reiterate and stand by content of paragraph 4.1 of our letter dated 04 September 2019.
3. Our client is currently in the process of preparing the answers to your questions, we trust that you appreciate that he needs to consult some of the persons whom he has worked with, in order to provide such answers to your questions.

4. As soon as that process is complete, he will provide his answers.

Yours faithfully

Mr. L.D Mantsha

Transmitted electronically without signature



info@lugisanimantshaattorneys.co.za

From: info@lugisanimantshaattorneys.co.za
Sent: Tuesday, 17 September 2019 09:49
To: 'Boipelo B. Ratshikana'; 'Shannon S. Van Vuuren'; 'Ppretorius@commissionsc.org.za'
Subject: THE COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF THE STATE ("THE COMMISSION")
Attachments: Letter to the Commission of Inquiry 17 September 2019.pdf

Dear Sir/Madam,

Please find attached hereto a letter for your attention.

Kind regards
 Yvonne



LUGISANIMANTSHA ATTORNEYS

info@lugisanimantshaattorneys.co.za 011 781 0095 www.lugisanimantshaattorneys.co.za

450 Jan Smuts Ave Burnside Island Office Park Block 6

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Box 1127 | Randburg | 2125 |

Our Ref: Mr. D Mantsha LM0257/18/C

Your ref: Ms B.K Shabalala / Ms L. Buthelezi
Att: The Chairperson of the Commission of Inquiry
Att: Ms. B.K Shabalala
Acting Secretary of the Commission of Inquiry
Per email: BoipeloR@commissionsc.org.za

Att: Adv Pretorius SC
Per email: Ppretorius@commissionsc.org.za
And to: ShannonV@commissionsc.org.za

Date: 17 September 2019

PRIVATE AND CONFIDENTIAL
(URGENT)

Dear Sir/Madam,

RE: THE COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF THE STATE ("THE COMMISSION")

1. We refer to the above matter and your letter dated 13 September 2019.
2. Our client is scheduled to appear in the criminal court in the Pietermaritzburg High Court during the week of 14 October 2019, and therefore the proposed dates of 14 to 25 October 2019 are not suitable to him.

3. Our client will attend the Commission hearing on the week of the 11 to 15 November 2019 as proposed to proceed with his evidence.
4. The explanation given as reason for your apology is contrary to your letter dated the 11 September 2019, and further email from your office dated the 11 of September 2019 which was sent to us at 12:57.

Yours faithfully

Mr. L.D Mantsha

Transmitted electronically without signature





2nd floor, Hillside House
17 Empire Road,
Parktown
Johannesburg
2193
Tel: (010) 214-0651

Email: inquiries@sastatecapture.org.za
Website: www.sastatecapture.org.za

**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

27 September 2019

Our reference:
Your reference:

Ms. KB Shabalala / Ms. L. Buthelezi
Mr. D. Mantsha LM0257/18/C

Lugisani Mantsha Attorneys
First Floor
Burnside Island
Block 6
410 Smuts Avenue
Craighall
Johannesburg

Email: info@lugisanimantshaattorneys.co.za
dan@lugisanimantshaattorneys.co.za

ATT: Mr D. Mantsha

Dear Sir

**THE COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF
STATE ("THE COMMISSION") // FORMER PRESIDENT MR. J.G. ZUMA ("Your
Client")**

1. We refer to your letter of 17 September 2019.
2. We note that you say in your letter that the former President is scheduled to appear in the Pietermaritzburg High Court during the week of 14 October 2019 but you do not say on which day or days during that week he is required to appear in that Court. You then say that the former President will appear before

the Commission from 11 to 15 November 2019 but you say nothing about the week of 21 to 25 November 2019 which is the second of the three weeks set aside for the former President's appearance before the Commission.

3. I am directed by the Chairperson to advise that:

(a) he excuses the former President from appearance before the Commission on the day or days on which he is required to appear before the criminal court in Pietermaritzburg but you are required to specify that date or those dates.

(b) in respect of any other dates set aside for the former President's appearance before the Commission on which the former President will not be appearing in the criminal court in Pietermaritzburg, he is not excused from appearance at this stage but, should he wish to be excused, a substantive application should be made to the Commission for an order excusing him from appearance before the Commission on the date or dates in question or for an order varying or amending the dates currently fixed for his appearance before the Commission; in making such an application cogent reasons or good cause should be shown for such an order, particularly bearing in mind that, as things presently stand, the Commission's lifespan goes only up to the end of February 2020 and there are many witnesses and implicated persons whom the Commission must still give an opportunity to testify before it.

(c) if a substantive application such as is referred to in (b) above is delivered to the Commission and is granted by the Chairperson, the former President will not be required to appear on the day or days on which the Chairperson will have excused him from appearing before the Commission; if, however, no application such as is referred to in (b) above is delivered or one is delivered but is dismissed by the Chairperson, the former President will be required to appear before the Commission on all the days on which he will not have been excused from appearing before the Commission.

Yours sincerely



Ms. KB Shabalala

Acting Secretary

**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE
CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING
ORGANS OF STATE**





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Website: www.sastatecapture.org.za

**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

27 September 2019

Our reference: Ms. KB Shabalala / Ms. L. Buthelezi
Your reference: Mr. D. Mantsha LM0257/18/C

Lugisani Mantsha Attorneys
First Floor
Burnside Island
Block 6
410 Smuts Avenue
Craighall
Johannesburg

Email: info@lugisanimantshaattorneys.co.za
dan@lugisanimantshaattorneys.co.za

ATT: Mr D Mantsha

Dear Sir

**THE COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF
STATE ("THE COMMISSION") // FORMER PRESIDENT MR. J.G. ZUMA ("Your
Client")**

1. In terms of the agreement that was announced by the Chairperson of the Commission on the 19th July 2019:

- (a) the Commission's Legal Team was required to furnish the former President's Counsel with its "areas of interest" in the various affidavits within a week;
- (b) Adv Pretorius and the former President's Counsel (Adv Sikhakhane) were required to agree within two weeks from 19 July 2019 a timeframe within which the former President would deliver his affidavit(s) responding to the contents of the various affidavits or statements which fall within the areas of interest identified by the Commission's Legal Team in the various affidavits, failing which they would report this to the Chairperson who would then determine the timeframe within which the former President had to deliver his affidavits.
2. Adv Pretorius submitted the Commission's Legal Team's "areas of interest" to Adv Sikhakhane on 30 July 2019.
 3. By the middle of August 2019 Adv Pretorius and Adv Sikhakhane had not agreed on any timeframe within which the former President had to deliver his affidavits.
 4. On 27 August 2019, Adv Sikhakhane informed Adv Pretorius that the former President's affidavit(s) would be delivered on 13 September 2019. This communication was not based on any agreement between the two Counsel.
 5. No affidavit(s) by the former President was or were delivered to the Commission on or before 13 September 2019 nor has any been delivered to the Commission to date.
 6. Given the above background, the Chairperson has now issued the following direction:
 - "1. The former President is directed to deliver to the Commission on or before Friday 4 October 2019 his affidavit(s) contemplated in

the terms of agreement announced by the Chairperson in 'the Commission on 19 July 2019.'

Yours sincerely



Ms. KB Shabalala

ACTING SECRETARY

**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE
CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING
ORGANS OF STATE**





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**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

30 September 2019

Our reference: Ms. KB Shabalala / Ms. L. Buthelezi
Your reference: Mr. D. Mantsha LM0257/18/C

Lugisani Mantsha Attorneys
First Floor
Burnside Island
Block 6
410 Smuts Avenue
Craighall
Johannesburg

Email: info@lugisanimantshaattorneys.co.za
dan@lugisanimantshaattorneys.co.za

ATT: Mr D Mantsha

Dear Sir

**THE COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF
STATE ("THE COMMISSION") // FORMER PRESIDENT MR. J.G. ZUMA ("Your
Client")**

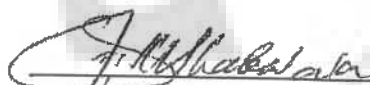
1. I refer to my letter to you dated 27 September 2019 which dealt with the failure by Mr Pretorius SC and Counsel for the former President to agree on a

timeframe within which the former President was required to deliver his affidavit(s) in terms of the agreement of 19 July 2019.

2. I am directed by the Chairperson to advise that he has added par 2 to his direction contained in par 6 on page 2 of that letter. Par 2 of the directive reads:

"2. The deadline in 1 above is provisional until 2 October 2019 to allow the former President to make representations on or before 2 October 2019 should there be serious difficulties with complying with the date of the 4 October 2019. Should the former President not deliver any representations on or before 2 October 2019, the date of 4 October 2019 will become final. However, should he make representations on or before 2 October 2019, the Chairperson will decide whether the date of 4 October 2019 will stand or whether it will be changed."

Yours sincerely



Ms. KB Shabalala

ACTING SECRETARY

JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE
CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING
ORGANS OF STATE

info@lugisanimantshaattorneys.co.za

From: info@lugisanimantshaattorneys.co.za
Sent: Tuesday, 01 October 2019 10:52
To: 'Boipelo B. Ratshikana'; 'Shannon S. Van Vuuren'; 'Ppretorius@commissionsc.org.za'
Subject: THE COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF THE STATE ("THE COMMISSION")

Attachments: Letter to the Commission dated 30 SEP 2019.pdf; ZUMA LETTER TO THE COMMISSION 16 AUGUST 2019.pdf

Dear Sir/Madam,

Please find attached hereto a letter for your attention.

Kind regards,
 Yvonne



LUGISANIMANTSHA ATTORNEYS

✉ info@lugisanimantshaattorneys.co.za ☎ 011 761 0059 🌐 www.lugisanimantshaattorneys.co.za

📍 416 Jan Smuts Ave Sandton Island Office Park Block 6

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Box 1127 | Randburg | 2125 |

Our Ref: Mr. D Mantsha LM0257/18/C

Your Ref: Ms B.K Shabalala / Ms L. Buthelezi
Att: Ms. B.K Shabalala
Acting Secretary of the Commission of Inquiry
Per email: BoipeloR@commissionsc.org.za

Att: Adv Pretorius SC
Per email: Ppretorius@commissionsc.org.za
And to: ShannonV@commissionsc.org.za

Date: 30 September 2019

PRIVATE AND CONFIDENTIAL
(URGENT)

Dear Sir/Madam,

RE: THE COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF THE STATE ("THE COMMISSION")

1. We refer to your letter of 27 September 2019.
2. We are utterly disappointed that the Commission has reneged on the recorded statement by the Chairperson which he publicly announced at the last day of the former President appearance at the hearing that his next appearance will be arranged, this meant that the Commission and ourselves will agree on suitable dates for his next appearance .

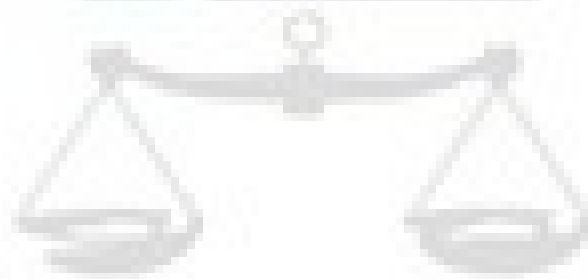
Director: Lugisani Mantsha Bjuris, LLB
Lugisani Mantsha Incorporated Reg: 2012/069234/21

3. The Former President's criminal case is postponed to 15 October 2019. As things stand, it is not clear to us what is going to happen hence he is also awaiting for judgement in his application .
4. However, the Former President is still committed to attend the Commission's proceedings during the dates from 11 to 15 November 2019 as per your letter dated 13 September 2019. Your letter dated 13 September 2019 did not propose the dates of 21 to 25 November 2019, and therefore we could not have taken instructions in respect of the said dates.

Yours faithfully

Mr. L.D Mantsha

Transmitted electronically without signature



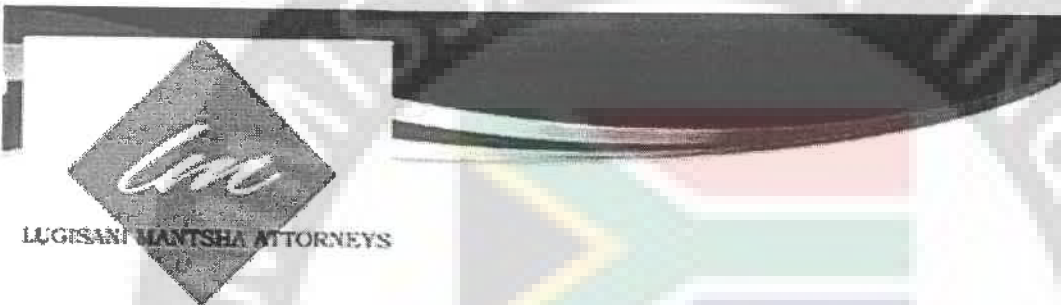
info@lugisanimantshaattorneys.co.za

From: info@lugisanimantshaattorneys.co.za
Sent: Tuesday, 01 October 2019 10:56
To: 'Boipelo B. Ratshikana'; 'Shannon S. Van Vuuren'; 'Ppretorius@commissionsc.org.za'
Subject: THE COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF THE STATE ("THE COMMISSION")
Attachments: Letter to the Commission dated 30 September 2019.pdf

Dear Sir/Madam,

Please find attached hereto a letter for your attention.

Kind regards,
 Yvonne



info@lugisanimantshaattorneys.co.za ☎ 011 781 6098 🌐 www.lugisanimantshaattorneys.co.za

410 Jan Smuts Ave, Roseville Island Office Park, Block 6

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Box 1127 | Randburg | 2125 |

Our Ref: Mr. D Mantsha LM0257/18/C

Your Ref: Ms B.K Shabalala / Ms L. Buthelezi
Att: Ms. B.K Shabalala
Acting Secretary of the Commission of Inquiry
Per email: BoipeloR@commissionsc.org.za

Att: Adv Pretorius SC
Per email: Ppretorius@commissionsc.org.za
And to: ShannonV@commissionsc.org.za

Date: 30 September 2019

PRIVATE AND CONFIDENTIAL
(URGENT)

Dear Sir/Madam,

RE: THE COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF THE STATE ("THE COMMISSION")

1. We refer to your letter of 27 September 2019, to which we respond in a separate letter.
2. We also refer to our letter dated 16 August 2019, which we attach hereto for ease of reference.
3. Since we previously attached the transcript of the proceedings which reflect the precise directives of the Chairperson, it is unnecessary, for present purposes to

Director: Lugisani Mantsha Bjuris, LLB
Lugisani Mantsha Incorporated Reg: 2012/069234/21

reply to each and every statement that has been made in your letter. The precise directives of the Chairperson are self-evident and require no repetition.

4. We had informed you in our letter dated 12 September 2019, that the Former President was in the process of responding to your questions.
5. In this regard, we request your indulgence to provide the commission with the answers thereto by 20 October 2019.

Yours faithfully

Mr. L.D Mantsha

Transmitted electronically without signature



info@lugisanimantshaattorneys.co.za

From: info@lugisanimantshaattorneys.co.za
Sent: Tuesday, 01 October 2019 17:28
To: 'Boipelo B. Ratshikana'; 'Shannon S. Van Vuuren'; 'Ppretorius@commissionsc.org.za'
Subject: THE COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF THE STATE ("THE COMMISSION")
Attachments: Letter to the Commission dated 01 October 2019.pdf

Dear Sir/Madam,

Please find attached hereto a letter for your attention.

Kind regards,
 Yvonne



✉ info@lugisanimantshaattorneys.co.za ☎ 011 781 0099 🌐 www.lugisanimantshaattorneys.co.za

📍 470 Jan Smuts Ave, Burnside Island Office Park, Block 6

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Box 1127 | Randburg | 2125 |

Our Ref: Mr. D Mantsha LM0257/18/C

Your Ref: Ms B.K Shabalala / Ms L. Buthelezi
Att: Ms. B.K Shabalala
Acting Secretary of the Commission of Inquiry
Per email: BoipeloR@commissionsc.org.za

Att: Adv Pretorius SC
Per email: Ppretorius@commissionsc.org.za
And to: ShannonV@commissionsc.org.za

Date: 01 October 2019

PRIVATE AND CONFIDENTIAL
"URGENT"

Dear Sir/Madam,

RE: THE COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF THE STATE ("THE COMMISSION")

1. We refer to your letter dated 30 September 2019.
2. We do not wish to engage in a blame game, however we have no reason to doubt our lead senior counsel's word on what had transpired between him and your Adv Pretorius SC.
3. We request you to provide us with any letters written by Adv Pretorius to our lead senior counsel confirming the said arrangements between them.

Director: Lugisani Mantsha Bjuris, LLB
Lugisani Mantsha Incorporated Reg: 2012/069234/21

Yours faithfully

Mr. L.D Mantsha

Transmitted electronically without signature



info@lugisanimantshaattorneys.co.za

From: Secretary <Secretary@commissionsc.org.za>
Sent: Tuesday, 01 October 2019 22:21
To: info@lugisanimantshaattorneys.co.za; dan@lugisanimantshaattorneys.co.za
Cc: Andre J. Lamprecht; Warren Redcliffe; Boipelo B. Ratshikana; Lerato L. Buthelezi; Trudi T. McCracken
Subject: FORMER PRESIDENT JACOB ZUMA // COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE

Dear Sirs

The above-mentioned matter bears reference.

In relation to the future further proceedings at this Commission pertaining to your client, Former President JG Zuma, we hereby confirm that the Commission will be sending yourselves the following:-

- Exhibit GG (c) – containing information on:
 - Nxasana
 - Simons
 - Hlungwani
- Exhibit GG (d) – containing further information on:
 - Maseko
 - Mentor
 - Nene
- Exhibit GG (e) – containing further information on:
 - Gordhan
 - Hogan
 - Agrizzi
 - J Zuma
- Exhibit GG – Judgements & Pleadings Reference bundle.

These Exhibits will be sent to yourselves in electronic format, via **secure link**, as well as in hard copy files which will be delivered to your offices.

Kindly revert with a cellphone number tomorrow, Wednesday 2 October 2019, so that the electronic files can be shared with you soonest via a password-protected link.

Thank you & kind regards,

Shannon Van Vuuren

Legal Advisor: Operations & Investigative Support
COMMISSION OF INQUIRY INTO STATE CAPTURE

Hillside House, 17 Empire Road, Parktown,
 Johannesburg, 2193 | Gauteng | South Africa |

Email: shannonv@commissionsc.org.za | www.sastatecapture.org.za



info@lugisanimantshaattorneys.co.za

From: Shannon S. Van Vuuren <ShannonV@commissionsc.org.za>
Sent: Wednesday, 02 October 2019 13:33
To: info@lugisanimantshaattorneys.co.za; dan@lugisanimantshaattorneys.co.za
Cc: Andre J. Lamprecht; Warren Redcliffe; Boipelo B. Ratshikana; Lerato L. Buthelezi; Trudi T. McCracken
Subject: RE: FORMER PRESIDENT JACOB ZUMA // COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE

Dear Sirs

I refer to the below email.

Herewith the secure link: -

Link: <https://we.tl/t-DfxXeaWJMv>

I note that we have not, as yet, received a cellphone number to which the password can be sent.

Please urgently revert with this cellphone number.

Thank you & kind regards,

Shannon Van Vuuren

Legal Advisor: Operations & Investigative Support

COMMISSION OF INQUIRY INTO STATE CAPTURE

Hillside House, 17 Empire Road, Parktown,
 Johannesburg, 2193 | Gauteng | South Africa |

Email: shannonv@commissionsc.org.za | www.sastatecapture.org.za



From: Secretary

Sent: Tuesday, 01 October 2019 22:21

To: 'info@lugisanimantshaattorneys.co.za' <info@lugisanimantshaattorneys.co.za>;

'dan@lugisanimantshaattorneys.co.za' <dan@lugisanimantshaattorneys.co.za>

Cc: Andre J. Lamprecht <andrel@commissionsc.org.za>; Warren Redcliffe <WarrenR@commissionsc.org.za>; Boipelo B. Ratshikana <BoipeloR@commissionsc.org.za>; Lerato L. Buthelezi <LeratoB@commissionsc.org.za>; Trudi T. McCracken <TrudiM@commissionsc.org.za>

Subject: FORMER PRESIDENT JACOB ZUMA // COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE

Dear Sirs

The above-mentioned matter bears reference.

In relation to the future further proceedings at this Commission pertaining to your client, Former President JG Zuma, we hereby confirm that the Commission will be sending yourselves the following:-

- Exhibit GG (c) – containing information on:

- Nxasana
- Simons
- Hlungwani
- Exhibit GG (d) – containing further information on:
 - Maseko
 - Mentor
 - Nene
- Exhibit GG (e) – containing further information on:
 - Gordhan
 - Hogan
 - Agrizzi
 - J Zuma
- Exhibit GG – Judgements & Pleadings Reference bundle.

These Exhibits will be sent to yourselves in electronic format, via secure link, as well as in hard copy files which will be delivered to your offices.

Kindly revert with a cellphone number tomorrow, Wednesday 2 October 2019, so that the electronic files can be shared with you soonest via a password-protected link.

Thank you & kind regards,

Shannon Van Vuuren

Legal Advisor: Operations & Investigative Support

COMMISSION OF INQUIRY INTO STATE CAPTURE

Hillside House, 17 Empire Road, Parktown,
Johannesburg, 2193 | Gauteng | South Africa |

Email: shannonv@commissionsc.org.za | www.sastatecapture.org.za





2nd floor, Hillside House
17 Empire Road,
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Johannesburg
2193

Tel (International): +27 (10) 214-0651
Tel (Tollfree): 0800 222 097
Email: inquiries@sastatecapture.org.za
Web: www.sastatecapture.org.za

**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

2 October 2019

RE: FORMER PRESIDENT JACOB ZUMA // COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE

Delivery to: DAN MANTSHA // 410 Jan Smuts Ave, Craighall Park, Randburg, 2196

TEL: 011 781 0099

Acknowledgement of receipt of the following **5 Lever Arch Files**:

1. Exhibit GG (c) – containing information on:
 - Nxasana
 - Simons
 - Hlungwani
2. Exhibit GG (d) – containing further information on:
 - Maseko
 - Mentor
 - Nene
3. Exhibit GG (e) – containing further information on:
 - Gordhan
 - Hogan
 - Agrizzi
 - J Zuma
4. Exhibit GG – Judgements & Pleadings Reference bundle (Files A and B)

Name: JVONNE

Occupation/Designation: PA

Organisation: LMA ATTORNEYS

ID Number: 8504 2204 82080



2nd floor, Hillside House
17 Empire Road,
Parktown,
Johannesburg,
2193

Tel: (010) 214-0651

Email: inquiries@sasatecapture.org.za
Website: www.sasatecapture.org.za

**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

04 October 2019

Our reference:

Ms. KB Shabalala / Ms. L. Buthelezi

Your reference:

Mr. D. Mantsha LM0257/18/C

Lugisani Mantsha Attorneys
First Floor
Burnside Island
Block 6
410 Smuts Avenue
Craigshall
Johannesburg

Email: info@lugisanimantshaattorneys.co.za
dan@lugisanimantshaattorneys.co.za

ATT: Mr D. Mantsha

Dear Sir

**THE COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE
("THE COMMISSION") // FORMER PRESIDENT MR. J.G. ZUMA ("Your Client")**

1. I refer to two letters you have sent us dated 30 September 2019 both of which bear the same subject matter. One has four paragraphs while the other has five. I also refer to your letter dated 1 October 2019.
2. All your three letters have been shown to the Chairperson who has directed me to advise as follows in regard to those points that he considers important and to require his attention:

- 2.1 in Adv Paul Pretorius SC's letter of 30 July 2019 addressed to Adv Sikhakhane SC it was pointed out in par 8 that the Chairperson had determined that 14 to 25 October 2019 and 11 to 15 November 2019 as the dates for the former President's further appearance before the Commission to continue with his evidence; these dates were emphasised in Adv Pretorius SC's letter of 13 September 2019 addressed to you.
- 2.2 it is not true that the terms of the agreement announced by the Chairperson on 19 July 2019 are to the effect that the dates when the former President would return to give evidence before the Commission would have to be agreed; the power to determine dates for appearance by anybody before the Commission vests in the Chairperson; however, once the Chairperson has determined dates for appearance by anybody before the Commission, the person required to appear before the Commission may bring a substantive application for the postponement of the hearing of his or her evidence or the amendment of those dates by the Chairperson where there are good grounds for a postponement or for an amendment of such dates of appearance.
- 2.3 the Chairperson has decided to excuse the former President from appearing before the Commission during the week starting on Monday 14 October 2019 even though the former President might only be required to appear in the criminal court in Pietermaritzburg on one of those five days, namely, 15 October 2019; the Chairperson has done this because he realises that the former President may need Monday 14 October 2019 for travelling in order to be at the criminal court in Pietermaritzburg on 15 October 2019 as well as because he appreciates that the former President may need Wednesday 16 October 2019 to travel from Kwa-Zulu Natal to Gauteng to appear before the Commission; this would leave only Thursday and Friday for his appearance before the Commission during that week; given the Chairperson's current attitude to the former President's appearance before the Commission during the week of 21-25 October 2019, the Chairperson excuses the former President from appearing before the Commission on Thursday 17 and Friday 18 October 2019 in case he may need those days

for final preparation for his appearance before the Commission the following week, namely the week of 21 to 25 October 2019.

- 2.4 that fact that the Chairperson had included 21-25 October 2019 among the dates for the former President's appearance before the Commission was made clear in Adv Pretorius SC's letter of 30 July 2019 to Adv Sikhakhane SC and in his letter of 13 September 2019 addressed to you; the Chairperson has not excused the former President from appearing before the Commission from 21-25 October 2019 and, if the former President seeks to be excused from such appearance, a substantive application will have to be brought.
- 2.5 it is noted that the former President has committed himself to appearing before the Commission from 11 to 15 November 2019.
- 2.6 with regard to the delivery by the former President of his affidavits contemplated in the agreement of 19 July 2019, the Chairperson notes that the former President has had more than two months to prepare such affidavits; the Commission's Legal Team submitted its "areas of interest" on 30 July 2019; in the circumstances, although the Chairperson has decided to change the deadline of 4 October 2019, he is unable to fix 20 October 2019 for the delivery of such affidavits and has fixed Monday 14 October 2019 as the date for the delivery of such affidavits.
- 2.7 to compensate for the loss of the week of 14 to 18 October 2019, the Chairperson will determine another week in November for the further appearance of the former President before the Commission; that will be in addition to the week in November that has already been indicated.

Yours sincerely



Ms. Brigitte Shabalala

Acting Secretary

**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**





2nd floor, Hillside House
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2193

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Email: inquiries@sastatecapture.org.za
Website: www.sastatecapture.org.za

**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

8 October 2019

Our reference:
Your reference:

Ms. KB Shabalala / Ms. L. Buthelezi
Mr. D. Mantsha LM0257/18/C

Lugisani Mantsha Attorneys
First Floor
Burnside Island
Block 6
410 Smuts Avenue
Craigshall
Johannesburg

Email: info@lugisanimantshaattorneys.co.za
dan@lugisanimantshaattorneys.co.za

ATT: Mr D. Mantsha

Dear Sir

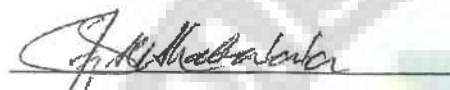
**THE COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE
("THE COMMISSION") // FORMER PRESIDENT MR. J.G. ZUMA ("YOUR CLIENT")**

RE: AREAS OF INTEREST DOCUMENT

1. The Deputy Chief Justice ("DCJ"), the Chairperson of the Commission, has requested me to advise as follows:

- 1.1. In order to respond to recent press reports which have alleged that the Former President has been provided with "eighty questions" by the Commission, the DCJ has determined to respond publicly.
- 1.2. In so doing he may disclose to the media the "Areas of Interest" document provided to yourselves on the 30th July 2019.
2. This disclosure is made to you as a matter of courtesy.

Yours sincerely



Ms. Brigitte Shabalala

Acting Secretary

**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

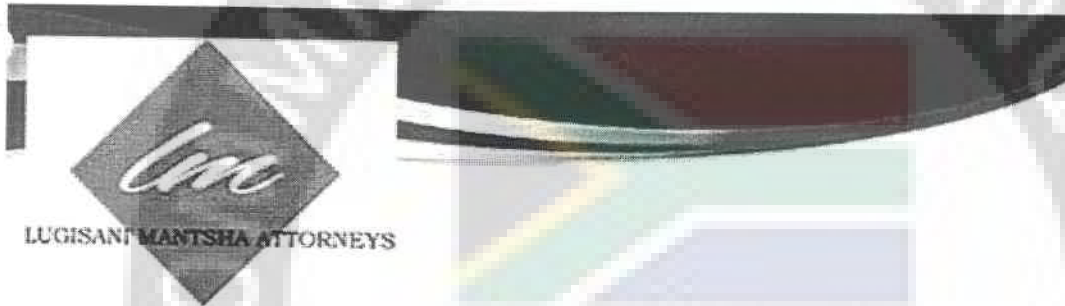
info@lugisanimantshaattorneys.co.za

From: info@lugisanimantshaattorneys.co.za
Sent: Tuesday, 15 October 2019 15:08
To: 'Boipelo B. Ratshekana'; 'Shannon S. Van Vuuren'; 'Ppretorius@commissionsc.org.za'
Subject: THE COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF THE STATE ("THE COMMISSION") // FORMER PRESIDENT MR. J.G. ZUMA
Attachments: Letter to the Commission dated 15 October 2019.pdf
Importance: High

Dear Sir/Madam,

Please find attached hereto a letter for your attention.

Kind regards,
 Yvonne



✉ info@lugisanimantshaattorneys.co.za ☎ 011 781 0059 🌐 www.lugisanimantshaattorneys.co.za

📍 410 Jan Smuts Ave Burside Island Office Park Block 6

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager. This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.



LUGISANI MANTSHA ATTORNEYS

First floor | Burnside Island | Block 6 | 410 Jan Smuts Ave | Craighall | Johannesburg
Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: Info@lugisanimantshaattorneys.co.za |
Box 1127 | Randburg | 2125 |

Our Ref: Mr. D Mantsha LM0257/18/C

Your Ref: Ms. B.K Shabalala / Ms. L. Buthelezi
Att: The Chairperson of the Commission of Inquiry

Att: Ms. B.K Shabalala
Acting Secretary of the Commission of Inquiry
Per email: BoipeloR@commissionsc.org.za

Att: Adv Pretorius SC
Per email: Ppretorius@commissionsc.org.za
And to: ShannonV@commissionsc.org.za

Date: 15 October 2019

PRIVATE AND CONFIDENTIAL

"URGENT"

Dear Sir/Madam,

RE: THE COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF THE STATE ("THE COMMISSION") // FORMER PRESIDENT MR. J.G. ZUMA

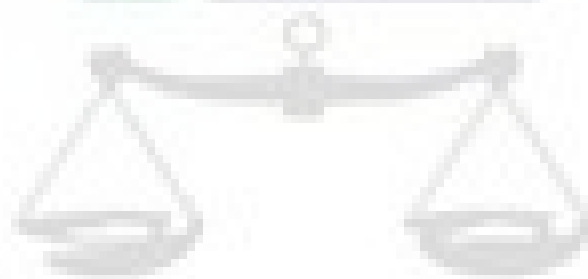
1. We refer to the above matter and our previous correspondences wherein, we stated that in light of the then impending decision in respect of the former President's application for the permanent stay, we were not in a position to confirm the proposed dates of his appearance in the month of October.

2. Our client has now received a judgment in his permanent stay application which he had informed the court today the 15 October 2019, that he is appealing the said judgment.
3. He is therefore required to submit his application for leave to appeal by 01 November 2019 and argue his application later during the month of November.
4. As a result of these events, our client and his legal team are not available to attend the proposed sitting of the Commission in October.

Yours Faithfully

Mr. L.D Mantsha

Transmitted electronically without signature



info@lugisanimantshaattorneys.co.za

From: Shannon S. Van Vuuren <ShannonV@commissionsc.org.za>
Sent: Tuesday, 15 October 2019 17:04
To: info@lugisanimantshaattorneys.co.za; dan@lugisanimantshaattorneys.co.za
Cc: Andre J. Lamprecht; Warren Redcliffe; Boipelo B. Ratshikana
Subject: FORMER PRESIDENT JACOB ZUMA // COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE
Attachments: LMA ATTORNEYS 15 OCT 2019.pdf

Dear Sirs

Please find attached herewith correspondence marked for your attention.

The supplementary bundle referred therein is accessible via these secure links:-

Links: <https://we.tl/t-zhbmb01cNu>
<https://we.tl/t-nwsXHfD2Xw>

I refer to my earlier telephone calls to your offices. I confirm that I have requested Mr. Dan Mantsha's cellphone number so that the password required for the above secure links can be sent via SMS to yourselves. I have explained to your offices that these documents are confidential. The links and password should not both be provided to the recipient (yourselves) via email, as a result the password is to be provided via another communication mechanism (SMS).

We have yet to receive a cellphone number to which the password can be sent, kindly furnish me with a cellphone number urgently.

Kindly acknowledge receipt hereof.

Thank you & kind regards,

Shannon Van Vuuren

Legal Advisor: Operations & Investigative Support

COMMISSION OF INQUIRY INTO STATE CAPTURE

Hillside House, 17 Empire Road, Parktown,
 Johannesburg, 2193 | Gauteng | South Africa |

Email: shannonv@commissionsc.org.za | www.sastatecapture.org.za





2nd floor, Hillside House
17 Empire Road,
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2193
Tel (International): +27 (10) 214-0651
Tel (Tollfree): 0800 322-097
Email: inquiries@sastatecapture.org.za
Web: www.sastatecapture.org.za

**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

15 October 2019

To: Lugisani Mantsha Attorneys
Attention: Dan Mantsha

By e-mail: info@lugisanimantshaattorneys.co.za
dan@lugisanimantshaattorneys.co.za

Dear Sirs

**APPEARANCE OF THE FORMER PRESIDENT MR JACOB ZUMA ("YOUR CLIENT")
BEFORE THE COMMISSION**

1. Please find enclosed a supplementary bundle marked Bundle GG(f) for your client's next appearance before the Commission on Monday, 21 October 2019. The bundle includes:
 - 1.1 An affidavit of Ms Nellswé Mildred Oliphant;
 - 1.2 An affidavit of Mr Makaringe Richard Baloyi;
 - 1.3 Two affidavits of Ms Yasmin Duarte (also known as Jessie Duarte);
 - 1.4 Two affidavits of Mr Samson Gwede Mantashe; and
 - 1.5 An affidavit of Mr Zwelini Lawrence Mkhize; and
 - 1.6 A main affidavit and supplementary affidavit of Mr Rajesh Sundaram.

Yours faithfully


MS BRIGITTE SHABALALA

Acting Secretary

Judicial Commission of Inquiry into Allegations of State Capture, Corruption and Fraud in the Public Sector including Organs of State



info@lugisanimantshaattorneys.co.za

From: Shannon S. Van Vuuren <ShannonV@commissionsc.org.za>
Sent: Thursday, 17 October 2019 11:45
To: info@lugisanimantshaattorneys.co.za; dan@lugisanimantshaattorneys.co.za
Cc: Andre J. Lamprecht; Warren Redcliffe; Boipelo B. Ratshikana
Subject: FORMER PRESIDENT JACOB ZUMA // ADDITIONAL DOCUMENTS // COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE

Dear Sirs

Further to our e-mail sent to yourselves on 15 October 2019, please find below a secure link to 3 (three) additional documents to be inserted in Bundle GG(d) in the order of the paginated pages.

Link: <https://we.tl/t-Ph3udEmXFd>

We confirm that we have yet to receive the selected cellphone number to which the password must be sent – in order to access these documents via secure link.

There is only one password – which password must be used in order to gain access to the documents via all the secure links sent to yourselves in this email trail.

Kindly provide us with the selected cellphone number as a matter of urgency.

Yours faithfully,

Shannon Van Vuuren

Legal Advisor: Operations & Investigative Support

COMMISSION OF INQUIRY INTO STATE CAPTURE

Hillside House, 17 Empire Road, Parktown,

Johannesburg, 2193 | Gauteng | South Africa |

Email: shannonv@commissionsc.org.za | www.sastatecapture.org.za



From: Shannon S. Van Vuuren

Sent: Tuesday, 15 October 2019 17:04

To: 'info@lugisanimantshaattorneys.co.za' <info@lugisanimantshaattorneys.co.za>;
 'dan@lugisanimantshaattorneys.co.za' <dan@lugisanimantshaattorneys.co.za>

Cc: Andre J. Lamprecht <andrel@commissionsc.org.za>; Warren Redcliffe <WarrenR@commissionsc.org.za>;
 Boipelo B. Ratshikana <BoipeloR@commissionsc.org.za>

Subject: FORMER PRESIDENT JACOB ZUMA // COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE

Dear Sirs

Please find attached herewith correspondence marked for your attention.

The supplementary bundle referred therein is accessible via these secure links:-

Links: <https://we.tl/t-zhbmbQ1cNu>
<https://we.tl/t-nwsXHfD2Xw>

I refer to my earlier telephone calls to your offices. I confirm that I have requested Mr. Dan Mantsha's cellphone number so that the password required for the above secure links can be sent via SMS to yourselves. I have explained to your offices that these documents are confidential. The links and password should not both be provided to the recipient (yourselves) via email, as a result the password is to be provided via another communication mechanism (SMS).

We have yet to receive a cellphone number to which the password can be sent, kindly furnish me with a cellphone number urgently.

Kindly acknowledge receipt hereof.

Thank you & kind regards,

Shannon Van Vuuren

Legal Advisor: Operations & Investigative Support

COMMISSION OF INQUIRY INTO STATE CAPTURE

Hillside House, 17 Empire Road, Parktown,

Johannesburg, 2193 | Gauteng | South Africa |

Email: shannonv@commissionsc.org.za | www.sastatecapture.org.za



info@lugisanimantshaattorneys.co.za

From: Shannon S. Van Vuuren <ShannonV@commissionsc.org.za>
Sent: Tuesday, 22 October 2019 16:50
To: info@lugisanimantshaattorneys.co.za; dan@lugisanimantshaattorneys.co.za
Cc: Andre J. Lamprecht; Warren Redcliffe; Boipelo B. Ratshikana
Subject: RE: FORMER PRESIDENT JACOB ZUMA // ADDITIONAL DOCUMENTS // COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE

Dear Sirs

Herewith a secure link to further additional documents relative to your client's next appearance before this Commission:

Link for Ramatlhodi affidavit = <https://we.tl/t-CalPh3fy4Y>

We confirm that we have yet to receive the selected cellphone number to which the password must be sent – in order to access these documents via secure link.

There is only one password – which password must be used in order to gain access to the documents via all the secure links sent to yourselves in this email trail.

Kindly provide us with the selected cellphone number as a matter of urgency.

An updated index will be provided to yourselves soonest.

Yours faithfully,

Shannon Van Vuuren

Legal Advisor: Operations & Investigative Support

COMMISSION OF INQUIRY INTO STATE CAPTURE

Hillside House, 17 Empire Road, Parktown,

Johannesburg, 2193 | Gauteng | South Africa |

Email: shannonv@commissionsc.org.za | www.sastatecapture.org.za



From: Shannon S. Van Vuuren

Sent: Thursday, 17 October 2019 11:46

To: 'info@lugisanimantshaattorneys.co.za' <info@lugisanimantshaattorneys.co.za>;

'dan@lugisanimantshaattorneys.co.za' <dan@lugisanimantshaattorneys.co.za>

Cc: Andre J. Lamprecht <andrel@commissionsc.org.za>; Warren Redcliffe <WarrenR@commissionsc.org.za>; Boipelo B. Ratshikana <BoipeloR@commissionsc.org.za>

Subject: FORMER PRESIDENT JACOB ZUMA // ADDITIONAL DOCUMENTS // COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE

Dear Sirs

Further to our e-mail sent to yourselves on 15 October 2019, please find below a secure link to 3 (three) additional documents to be inserted in Bundle GG(d) in the order of the paginated pages.

Link: <https://we.tl/t-Ph3udEmXFd>

info@lugisanimantshaattorneys.co.za

From: Shannon S. Van Vuuren <ShannonV@commissionsc.org.za>
Sent: Thursday, 24 October 2019 16:38
To: info@lugisanimantshaattorneys.co.za
Subject: RE: Redi Tlhabi // Jacob Zuma // State Capture Commission

Many thanks Dayna.

Kind regards,

Shannon Van Vuuren

Legal Advisor: Operations & Investigative Support
COMMISSION OF INQUIRY INTO STATE CAPTURE

Hillside House, 17 Empire Road, Parktown,
 Johannesburg, 2193 | Gauteng | South Africa |

Email: shannonv@commissionsc.org.za | www.sastatecapture.org.za



From: info@lugisanimantshaattorneys.co.za [mailto:info@lugisanimantshaattorneys.co.za]
Sent: Thursday, 24 October 2019 16:38
To: Shannon S. Van Vuuren <ShannonV@commissionsc.org.za>; dan@lugisanimantshaattorneys.co.za
Cc: Andre J. Lamprecht <AndreL@commissionsc.org.za>; Warren Redcliffe <WarrenR@commissionsc.org.za>;
 Boipelo B. Ratshikana <BoipeloR@commissionsc.org.za>
Subject: RE: Redi Tlhabi // Jacob Zuma // State Capture Commission

Dear Madam,

We refer to the above matter and confirm receipt hereof.

Kind regards,
 Dayna

info@lugisanimantshaattorneys.co.za

From: info@lugisanimantshaattorneys.co.za
Sent: Monday, 28 October 2019 13:59
To: 'Boipelo B. Ratshikana'; 'Shannon S. Van Vuuren'
Subject: REDIHENTSE TLHABI'S NOTICE OF APPLICATION TO CROSS-EXAMINE MR. J.G ZUMA
Attachments: Letter to the Commission dated 28 October 2019.pdf; NOTICE TO OPPOSE.pdf

Dear Sir/Madam,

Attached herewith please find a letter for your attention.

Kind regards,
Yvonne



LUGISANIMANTSHA ATTORNEYS

✉ info@lugisanimantshaattorneys.co.za ☎ 011 734 0010 🌐 www.lugisanimantshaattorneys.co.za

📍 410 Jan Smuts Ave Sandvlei Island Office Park Block 6

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LUGISANI MANTSHA ATTORNEYS

First floor | Burnside Island | Block 6 | 410 Jan Smuts Ave | Craighall | Johannesburg
Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: Info@lugisanimantshaattorneys.co.za |
Box 1127 | Randburg | 2125 |

Our Ref: Mr. D Mantsha LM0257/18/C

Your Ref: Ms. B.K Shabalala / Ms. L. Buthelezi
Att: The Chairperson of the Commission of Inquiry

Att: Ms. B.K Shabalala
Acting Secretary of the Commission of Inquiry
Per email: BoipeloR@commissionsc.org.za

Att: Adv Pretorius SC
Per email: Ppretorius@commissionsc.org.za
And to: ShannonV@commissionsc.org.za

Date: 28 October 2019

PRIVATE AND CONFIDENTIAL

"URGENT"

Dear Sir/Madam,

**RE: REDIHENTSE TLHABI'S NOTICE OF APPLICATION TO CROSS-EXAMINE
MR. J.G ZUMA**

We refer to the above matter and enclose the former President Mr. J.G Zuma's notice of intention to oppose for your attention.

Yours Faithfully

Mr. L.D Mantsha

Transmitted electronically without signature

info@lugisanimantshaattorneys.co.za

From: Shannon S. Van Vuuren <ShannonV@commissionsc.org.za>
Sent: Thursday, 31 October 2019 11:51
To: info@lugisanimantshaattorneys.co.za; dan@lugisanimantshaattorneys.co.za
Cc: Andre J. Lamprecht; Boipelo B. Ratshikana
Subject: RE: REDIHENTSE TLHABI'S NOTICE OF APPLICATION TO CROSS-EXAMINE MR. J.G ZUMA
Attachments: Redi Tlhabi Jacob Zuma State Capture Commission (5,42 MB)

Dear Sirs

We acknowledge receipt of your client's intention to oppose this application.

A friendly reminder that your client's comments in answer to this application are due, by close of business, today.

We look forward to receiving same.

Yours faithfully,

Shannon Van Vuuren

Legal Advisor: Operations & Investigative Support

COMMISSION OF INQUIRY INTO STATE CAPTURE

Hillside House, 17 Empire Road, Parktown,

Johannesburg, 2193 | Gauteng | South Africa |

Email: shannonv@commissionsc.org.za | www.sastatecapture.org.za



From: info@lugisanimantshaattorneys.co.za [mailto:info@lugisanimantshaattorneys.co.za]

Sent: Monday, 28 October 2019 13:59

To: Boipelo B. Ratshikana <BoipeloR@commissionsc.org.za>; Shannon S. Van Vuuren <ShannonV@commissionsc.org.za>

Subject: REDIHENTSE TLHABI'S NOTICE OF APPLICATION TO CROSS-EXAMINE MR. J.G ZUMA

Dear Sir/Madam,

Attached herewith please find a letter for your attention.

Kind regards,

Yvonne



LUGISANI MANTSHA ATTORNEYS

First floor | Burnside Island | Block 6 | 410 Jan Smuts Ave | Craighall | Johannesburg
Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: Info@lugisanimantshaattorneys.co.za |
Box 1127 | Randburg | 2125 |

ACKNOWLEDGMENT OF RECEIPT

Name: Lerato BwmekeziOccupation/Designation: DCT's Legal Researcher (aka....)Organisation: State Capture CommissionTime Received: 14h12Date Received: 1 November 2019Signature: 



LUGISANI MANTSHA ATTORNEYS

First floor | Burnside Island | Block 6 | 410 Jan Smuts Ave | Craighall | Johannesburg
Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: Info@lugisanimantshaattorneys.co.za |
Box 1127 | Randburg | 2125 |

Our Ref: Mr. D Mantsha LM0257/18/C

Chairperson of the Commission of Inquiry into State Capture
2nd Floor Hillside House
17 Empire Road
Parktown
Johannesburg
2193

By hand



Date: 01 November 2019

PRIVATE AND CONFIDENTIAL
"URGENT"

Dear Chairperson,

RE: THE FORMER PRESIDENT MR. J.G ZUMA

1. We refer to the above matter and advise that former President was admitted in Hospital over the past weekend and was released late afternoon yesterday for him to continue treatment at his home.
2. The former President asked us to convey to you that due to the above he will not be able to attend the scheduled sitting of the Commission commencing on 11 November 2019 to 15 November 2019, he will however keep you updated on his recovery progress.

Yours Faithfully

Mr. L.D Mantsha





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**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

4 November 2019

Your Ref: Mr D Mantsha LM0257/18/C

Lungisani Mantsha Attorneys
First Floor
Burnside Island
Block 6
410 Jan Smuts Ave.
Craigshall, Johannesburg

E-mail: info@lungisanimantshaattorneys.co.za
[/dan@lungisanimantshaattorney.co.za](mailto:dan@lungisanimantshaattorney.co.za)

Dear Sirs

RULE 3.4 APPLICATION: REDIHENTSE TLHABI RE EVIDENCE OF MR J.G ZUMA

We acknowledge receipt of your letter dated 31 October 2019 and your client's Notice of Opposition to Ms Tlhabi's application to give evidence and cross-examine your client dated 27 September 2019.

The DCJ has directed your client to respond to Ms. Tlhabi's application within seven days of receipt hereof. Should your client fail to do so, the application will be considered accordingly.

Yours faithfully

MS K B SHABALALA

Acting Secretary

Judicial Commission of Inquiry into Allegations
of State Capture, Corruption and Fraud
in the Public Sector including Organs of State

info@lugisanimantshaattorneys.co.za

From: info@lugisanimantshaattorneys.co.za
Sent: Wednesday, 06 November 2019 13:27
To: 'Boipelo B. Ratshikana'; 'Shannon S. Van Vuuren'
Subject: RULE 3.4 APPLICATION: REDIHENTSE TLHABI'S RE EVIDENCE OF MR. J.G ZUMA
Attachments: Letter to the Commission dated 06 November 2019.pdf

Dear Madam,

Please find attached hereto a letter for your attention.

Kind regards,
 Yvonne



✉ info@lugisanimantshaattorneys.co.za ☎ 011 731 5030 🌐 www.lugisanimantshaattorneys.co.za

📍 410 Jan Smuts Ave. Burnside Island Office Park Block 8

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Box 1127 | Randburg | 2125 |

Our Ref: Mr. D Mantsha LM0257/18/C

Your Ref: Ms. B.K Shabalala / Ms. L. Buthelezi
Att: Ms. B.K Shabalala
Acting Secretary of the Commission of Inquiry
Per email: BoipeloR@commissionsc.org.za

Att: Adv Pretorius SC
Per email: Ppretorius@commissionsc.org.za
And to: ShannonV@commissionsc.org.za

Date: 06 November 2019

PRIVATE AND CONFIDENTIAL

"URGENT"

Dear Sir/Madam,

RE: RULE 3.4 APPLICATION: REDIHENTSE TLHABI'S RE EVIDENCE OF MR. J.G ZUMA

1. We refer to the above matter and your letter dated 4 November 2019.
2. For the reason which we had communicated to the Chairperson of the Commission, our client is unable to make the requested statement at this stage.

Yours Faithfully

Mr. L.D Mantsha
Transmitted electronically without signature



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17 Empire Road,
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**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

15 November 2019

To: Mr. D. Mantsha

Lugisani Mantsha Attorneys

E-mail: info@lugisanimantshaattorneys.co.za
dan@lugisanimantshaattorneys.co.za

Dear Mr. Mantsha.

**THE COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE
("THE COMMISSION") // YOUR CLIENT: FORMER PRESIDENT MR. J.G. ZUMA & MS.
REDIHENTSE TLHABI**

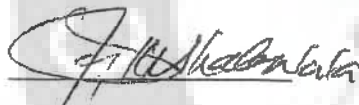
Dear Mr Mantsha.

1. On 24 October 2019, the State Capture Commission forwarded to you an application by Ms Tlhabi to cross-examine former President JG Zuma ("Mr Zuma") and to give evidence herself before the Commission.
2. In this communication, your client was requested to comment on the application if he so elected.
3. In your response, dated 28 October 2019, you sent to the Commission a notice of intention to oppose the application to cross-examine.
4. Further correspondence followed, including your letter of 31 October 2019, in which you stated that you were unable to provide Mr Zuma's statement "at this stage" and that you

were entitled in any event to oppose the application based on the contents of the application itself.

5. On 4 November 2019, a letter was addressed to you stating that the Deputy Chief Justice had directed Mr Zuma to respond to the application within seven days and should he fail to do so, *"the application would be considered accordingly"*.
6. The letter of 4 November 2019 was sent to you in error and without the Deputy Chief Justice himself having issued the relevant directive.
7. We apologise for this error.
8. We will notify your offices of the date of the relevant application in due course.

Yours faithfully.



Ms. Brigitte Shabalala

Acting Secretary

JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE



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**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

3 December 2019

To: Lugisani Mantsha Attorneys (Attention: Mr. Dan Mantsha)

E-mail: info@lugisanimantshaattorneys.co.za

And to: Webber Wentzel (Attention: Dario Milo / Lavanya Pillay)

E-mail: lavanya.pillay@webberwentzel.com

Dear Sirs

RE: CHAIRPERSON'S DIRECTIONS: SEQ 39/2019 RULE 3.4 APPLICATION // REDIHENTSE TLHABI // FORMER PRESIDENT JACOB ZUMA

1. We refer to the abovementioned application and hereby advise that on this day, 3rd December 2019, the Chairperson of the Commission issued the following Directions:
 - 1.1. "If the Former President, Mr. Jacob Zuma, wishes to say anything in opposition to Ms. Redihentse Tlhabi's application for leave to give evidence and to cross-examine him, he must deliver written submissions to the Acting Secretary of the Commission on or before Monday, 9th December 2019.
 - 1.2. If no written submissions are delivered to the Acting Secretary of the Commission on or before Monday, 9th December 2019, the Chairperson will deal with the application in the manner he will deem appropriate including making a decision thereon.
 - 1.3. If the Former President, Mr. Jacob Zuma, does deliver written submissions within the timeframe indicated in opposition to Ms Redihentse Tlhabi's application, the Chairperson will take into account the written submissions and either announce the

outcome thereof as soon as possible thereafter or invite Ms. Redihentse Thlabi, if necessary, to respond to those written submissions in which case the matter will be decided at a later date."

Yours faithfully,



**Ms Brigitte Shabalala
Acting Secretary**

**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**



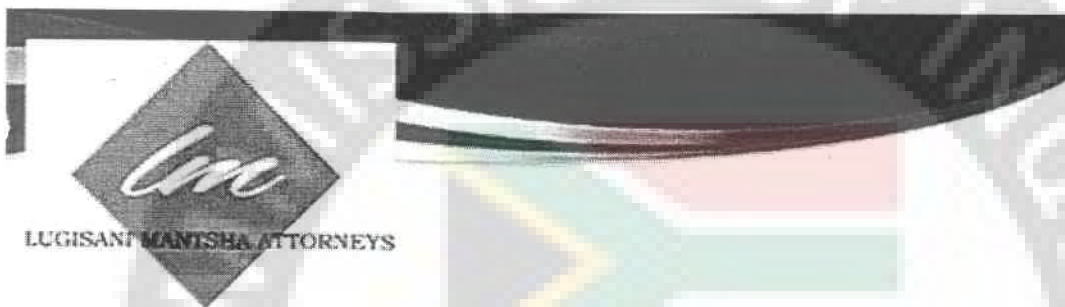
info@lugisanimantshaattorneys.co.za

From: info@lugisanimantshaattorneys.co.za
Sent: Wednesday, 04 December 2019 10:13
To: 'Boipelo B. Ratshikana'
Cc: 'Shannon S. Van Vuuren'
Subject: CHAIRPERSON'S DIRECTIONS: SEQ 39/2019 RULE 3.4 APPLICATION // REDIHENTSE TLHABI // FORMER PRESIDENT JACOB ZUMA
Attachments: Letter to the Commission dated 04 Dec 2019.pdf

Dear Madam,

Attached please find hereto a letter for your attention.

Kind regards,
 Yvonne



LUGISANI MANTSHA ATTORNEYS

✉ info@lugisanimantshaattorneys.co.za ☎ 011 781 0090 🌐 www.lugisanimantshaattorneys.co.za

📍 410 Jan Smuts Ave Boksido Island Office Park Block 5

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Box 1127 | Randburg | 2125 |

Our Ref: Mr. D Mantsha LM0257/18/C

Your Ref: Ms. B.K Shabalala / Ms. L. Buthelezi

The Chairperson of the Commission of Inquiry

c/o Ms. B.K Shabalala
Acting Secretary of the Commission of Inquiry
Per email: BoipeloR@commissionsc.org.za

Date: 04 December 2019

PRIVATE AND CONFIDENTIAL

"URGENT"

Dear Sir/Madam,

RE: CHAIRPERSON'S DIRECTIONS: SEQ 39/2019 RULE 3.4 APPLICATION // REDIHENTSE TLHABI // FORMER PRESIDENT JACOB ZUMA

1. We refer to the above matter and your correspondence of 3 December 2019, and the issued directive to the effect that Mr. Zuma must make his submissions by 9 December 2019.
2. As we have stated before, Mr. Zuma is ill and is currently hospitalized.
3. Accordingly, we are unable to obtain instructions from him in order to make legal submissions on his behalf, we request an indulgence until such time that he will be well and able to give us instructions.

Director: Lugisani Mantsha Bjuris, LLB
Lugisani Mantsha Incorporated Reg: 2012/069234/21

Yours Faithfully

Mr. L.D Mantsha

Transmitted electronically without signature

CC: Adv Pretorius SC
Per email: Ppretorius@commissionsc.org.za
And to: ShannonV@commissionsc.org.za





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Website: www.sastatecapture.org.za

**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

13 December 2019

Your Ref: **Mr. D Mantsha LM0257/18/C**

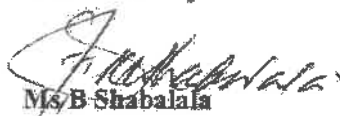
Lugisani Mantsha Attorneys
1st floor Burnside Island Block 6
410 Jan Smuts Ave
Craighall
Johannesburg

Dear Sirs

Re: **New Dates for the further appearance of Mr Jacob Zuma before the Commission: 27-31 January 2020**

1. You are hereby notified that the Chairperson of the Commission has determined the date of 27 to 31 January 2020 (both dates inclusive) as the dates for the further appearance of the former President, Mr Jacob Zuma, before the Commission.
2. You are requested to inform him of the above dates immediately.

Yours sincerely


Ms B Shabalala
Acting Secretary

info

From: Warren Redcliffe <WarrenR@commissionsc.org.za>
Sent: Tuesday, 17 December 2019 11:03 AM
To: dan@lugisanimantshaattorneys.co.za
Cc: Dayna Arnoldi; Sabina Lech; Shannon S. Van Vuuren; Samukelisiwe Jali; Boipelo B. Ratshikana
Subject: Judicial Commission of Inquiry into Allegations of State Capture // Former President Mr. JG Zuma
Attachments: Letter to DM V2 17 Dec 2019.pdf

Dear Sir,

Please ignore the previous e-mail which contained an error and has thus been recalled.

Please find attached a letter for your urgent attention.

☐ Yours sincerely,

Warren Redcliffe
COMMISSION OF INQUIRY INTO STATE CAPTURE
Hillside House, 17 Empire Road, Parktown,
Johannesburg, 2193 | Gauteng | South Africa |
Email: warrenr@commissionsc.org.za | www.sastatecapture.org.za





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**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

17 December 2019

Lugisani Mantsha Attorneys
First Floor
Burnside Island, Block 6
410 Jan Smuts Avenue
Craighall, Johannesburg



Email: info@lugisanimantshaattorneys.co.za
dan@lugisanimantshaattorneys.co.za

Your Ref: Mr D Mantsha LM0257/18/C

Dear Mr Mantsha

Further testimony of the Former President Mr J.G Zuma

1. This letter is addressed to you as representing former President Jacob Zuma ("Mr Zuma") on behalf of the legal team of the State Capture Commission. It follows your client's failure to appear at the hearings of the Commission for separate periods of three weeks during October and November 2019.

2. The following facts relevant to engagements between the Commission and Mr Zuma are placed on record:

- 2.1. Since the commencement of the hearings of the Commission in August 2018, several witnesses have given evidence concerning and implicating Mr Zuma;
- 2.2. On each such occasion, a notice in terms of the Commission Rules has been issued to Mr Zuma setting out details of the evidence implicating Mr Zuma and inviting him to respond by making application to put his own version of the relevant allegations before the Commission and to cross-examine the relevant witnesses;
- 2.3. In respect of some 23 notices so issued, Mr Zuma has declined to make any application to put his own version in response to allegations made against and concerning him and to cross-examine the relevant witnesses;
- 2.4. On 13 September 2018, the Chairperson, at a public hearing, invited Mr Zuma to assist the Commission by deposing to an affidavit to respond to allegations relating to him made by Ms Mabel Mentor and Mr Themba Maseko. This invitation was extended to Mr Zuma notwithstanding Mr Zuma's view that he had not yet been implicated by any evidence before the Commission. Mr Zuma's attorneys, who were present at the relevant hearing, undertook to convey the invitation to him;
- 2.5. On 11 October 2018, the Commission was informed in writing by yourselves that Mr Zuma was attending to the matter and that you had written to the Presidency requesting to be provided with the necessary records so that he

could assist the Commission and revert thereafter;

2.6. On 26 April 2019, the Chairperson addressed a letter to yourselves to note the Commission's "deep concern" that despite the passage of time of more than seven months since the invitation and more than six months since the letter of 11 October 2018, Mr Zuma had not complied with the Chairperson's request and had not provided reasons for such failure;

2.7. To date, Mr Zuma has not provided the affidavit requested;

2.8. On 2 May 2019, the Chairperson addressed a letter dated 30 April 2019 to yourselves to set aside time for him to appear before the Commission in order to:

"(a) give his side of the story on the evidence given by various witnesses in which his name has been mentioned or in which he has been implicated in one way or another;

(b) to answer such questions as the Chairperson and/or representative of the Commission's Legal Team or a Commission's evidence leader may wish to put to him about matters which are the subject of the Commission's inquiry.

The letter further clarified that *"the questions that Mr Zuma will be asked will cover matters dealt with by certain witnesses who have given evidence before the Commission in so far as he may have knowledge thereof as well as any other matters that fall within the terms of reference of the Commission."* To such end, the dates of 15 to 19 July 2019 were proposed

as appearance dates for Mr Zuma.

- 2.9. A further letter attaching a list of witnesses in regard to whose evidence Mr Zuma would be asked questions was sent to yourselves on 6 May 2019;
- 2.10. On 20 June 2019, a letter was sent to yourselves stating, amongst other things, the following:
- *3. For your client's appearance on 15 to 19 July 2019 the Commission requires your client to testify on the issues or matters covered by the statements or affidavits of the witnesses whose names have been provided to you and in so far as those statements or affidavits refer to, or, relate to, him in one way or another. The questions that he will be asked will also fall within that scope. To the extent that the impression may have been created in previous correspondence that some of the questions could fall outside that scope, it is hereby confirmed that that will not be the case. Accordingly, your client knows what the issues or matters are on which his evidence is required and on which he will be asked questions on the witness stand.*" (own emphasis)
- 2.11. On 24 June 2019, Mr Zuma undertook in writing to appear before the Commission from 15 July 2019 to 19 July 2019;
- 2.12. During the week commencing 15 July 2019 and in response to the invitation by the Chairperson, Mr Zuma appeared before the Commission and gave evidence for approximately three days;
- 2.13. On 19 July 2019, the Chairperson confirmed, in a public hearing of the Commission, an arrangement agreed in Chambers. In summary, the agreed

arrangement was to the following effect:

- 2.13.1. the decision that Mr Zuma would no longer participate in the proceedings was withdrawn;
- 2.13.2. Mr Zuma and his legal team wished to continue to cooperate with the Commission;
- 2.13.3. to address Mr Zuma's concerns, the Commission's legal team would inform Mr Zuma's legal team of the Commission's "areas of interest" in relation to each witness statement or affidavit on which the Commission required Mr Zuma to testify. Thereafter, Mr Zuma would provide an affidavit, through his legal team, that provided his version to the identified "areas of interest";
- 2.13.4. the Commission's legal team would provide the "areas of interest" document to Mr Zuma's counsel within two weeks from 19 July 2019. Counsel for the Commission and counsel for Mr Zuma would meet to agree on the timeframes within which Mr Zuma would respond with his affidavit(s) in response to the "areas of interest";
- 2.13.5. if the parties were not able to agree on such timeframes between themselves, the parties would approach the Chairperson who would hear both sides and decide the applicable timeframes;
- 2.13.6. it was contemplated between the parties that Mr Zuma would return to the Commission to give further evidence following the above exchanges. The above process was contemplated as possibly

shortening the time period required for Mr Zuma's further testimony.

- 2.14. Pursuant to the agreed arrangement and on 30 July 2019, the writer addressed an email to Adv Muzi Sikhakhane SC representing Mr Zuma. To this email was attached a letter which set out the "areas of interest" which the Commission required Mr Zuma to address in an affidavit and in subsequent evidence. The letter also informed Mr Zuma that the Chairperson had directed that Mr Zuma should return to give evidence before the Commission from 14 October 2019 to 25 October 2019 and then from 11 November 2019 to 15 November 2019. Adv Muzi Sikhakhane SC confirmed receipt of the email on the same day;
- 2.15. In a letter dated 16 August 2019, you informed the Commission, amongst other things, that you were *"in the process of responding to the issues raised"* in the letter of 30 July 2019;
- 2.16. On 27 August 2019, Advocate Sikhakhane SC addressed a WhatsApp note to the writer as follows:
- "I have had a consultation with Zuma's attorney and he tells me that you will receive the response on or before 13 September 2019."*
- 2.17. To date, no such response has been received;
- 2.18. On 10 September 2019, a letter was addressed to yourselves which confirmed that the Chairperson had determined the dates of 14 October 2019 to 25 October 2019 and 11 November 2019 to 15 November 2019 for Mr Zuma's next appearance before the Commission. The letter also directed

that such dates would stand unless changed by the Chairperson, which he had the power to do if sound and cogent reasons were provided to him;

2.19. On 11 September 2019, the writer addressed a letter to yourselves which, amongst other things, reminded you that the Chairperson still required Mr Zuma's response to the "areas of interest" letter dated 30 July 2019 (erroneously typed as "03rd" July 2019);

2.20. On 12 September 2019, you replied to the writer's letter of 11 September 2019 by informing the Commission that *"[o]ur client is currently in the process of preparing the answers to your questions, we trust that you appreciate that he needs to consult some of the persons whom he has worked with, in order to provide such answers to your questions. As soon as that process is complete, he will provide his answers."*

2.21. By way of a letter dated 13 September 2019, Mr Zuma was requested, through yourselves, to confirm that he would appear before the Commission on the hearing dates of 14 October 2019 to 25 October 2019 and from 11 November 2019 to 15 November 2019.

2.22. Mr Zuma did not appear as directed.

2.23. On 17 September 2019, you wrote to the Commission informing it that *"...[o]ur client is scheduled to appear in the criminal court in the Pietermaritzburg High Court during the week of 14 October 2019, and therefore the proposed dates of 14 to 25 October 2019 are not suitable to him"*. Your letter also recorded that *"our client will attend the Commission hearing on the week of the 11 to 15 November 2015 as proposed to proceed*

with his evidence".

- 2.24. On 30 September 2019, an email attaching a letter dated 27 September 2019 was forwarded to yourselves which contained, amongst other things, the Chairperson's following directive:

"1. The former President is directed to deliver to the Commission on or before Friday 4 October 2019 his affidavit(s) contemplated in the terms of agreement announced by the Chairperson in the Commission on 19 July 2019."

- 2.25. On 30 September, an additional directive was added to the above in the form of a letter which read:

"2. The deadline in 1 above is provisional until 2 October 2019 to allow the former President to make representations on or before 2 October 2019 should there be serious difficulties with complying with the date of the 4 October 2019. Should the former President not deliver any representations on or before 2 October 2019, the date of 4 October 2019 will become final. However, should he make representations on or before 2 October 2019, the Chairperson will decide whether the date of 4 October 2019 will stand or whether it will be changed."

- 2.26. On 30 September 2019, a further letter dated 27 September 2019 was emailed to yourselves. On the directive of the Chairperson, Mr Zuma was informed that he was (a) excused from appearing on the day(s) on which he was required to appear before the criminal court in Pietermaritzburg; and (b) not excused from attending the Commission on all other hearing dates

set aside unless the Chairperson excused him from appearing and on substantive application being made by him.

- 2.27. On 30 September 2019, you reminded the Commission of your letters dated 16 August 2019 and 12 September 2019 which informed it that Mr Zuma was in the process of responding to the "areas of interest" document. A further indulgence to provide his answers thereto was requested until 20 October 2019.
- 2.28. By way of a letter from yourselves dated 30 September 2019, Mr Zuma confirmed his commitment to appear before the Commission from 11 November 2019 to 15 November 2019.
- 2.29. On 4 October 2019, the Chairperson issued a directive which may be summarised as follows: (a) that Mr Zuma is excused from appearing before the Commission during the week starting 14 October 2019; (b) that Mr Zuma is required to appear before the Commission from 21 October 2019 to 25 October 2019; (c) that it is noted that Mr Zuma has committed to appearing before the Commission from 11 November 2019 to 15 November 2019; (d) that the date of 14 October 2019 is the new date by which Mr Zuma is required to deliver his affidavit(s) dealing with the "areas of interest"; and (e) that the Chairperson will determine another week in November 2019 for the loss of the week of appearance of 14 October 2019 to 18 October 2019.
- 2.30. On 15 October 2019, you informed the Commission by letter that neither Mr Zuma nor his legal team were available to attend the proposed sitting of the Commission in October 2019 for the following reasons:

"1. ...[T]hat in light of the impending decision in respect of the former President's application for the permanent stay, we are not in a position to confirm the proposed dates of his appearance in the month of October.

2. Our client has now received a judgment in his permanent stay application which he had informed the court today the 15 October 2019, that he is appealing the said judgment.

3. He is therefore required to submit his application for leave to appeal by 01 November 2019 and argue his application later during the month of November."

2.31. On 1 November 2019, Mr Zuma informed the Commission, through yourselves, that he would not be able to attend the scheduled sitting of the Commission from 11 November 2019 to 15 November 2019 for the following reasons:

"1. ...[F]ormer President was admitted in Hospital over the past weekend and was released late afternoon yesterday for him to continue treatment at his home.

2. The former President asked us to convey to you that due to the above he will not be able to attend the scheduled sitting of the Commission commencing on 11 November 2019 to 15 November 2019, he will however keep you updated on his recovery progress."

3. In the view of the writer, none of the issues raised and referred to in the previous paragraph, derogates from the views expressed and the conclusion reached in this letter.
4. The above record of events is a matter of material concern for the legal team of the Commission. First, the inability of the Commission to secure the attendance of Mr Zuma to continue evidence before the Commission is hampering the work of the Commission. Second, and in particular, the refusal or failure to submit an affidavit in response to the "areas of interest" communication of 30 July 2019 is a breach of the arrangement agreed and referred to above. Third, the loss of three weeks hearing time is something the Commission can ill afford both in relation to time and the costs involved. Finally it is noted that despite the Chairperson's various directives, you have failed or refused to approach him by way of formal applications to seek rulings excusing non-compliance with his directives.
5. What is clear from all the above, is that new measures are required to enable the Commission:
 - 5.1. to hear Mr Zuma's version in regard to matters raised in evidence concerning him and which implicates him;
 - 5.2. to question Mr Zuma in regard to those matters;
 - 5.3. generally to conclude the work of the Commission comprehensively and efficiently and in accordance with a reliable and practicable timetable.
6. In order to achieve this, it has been decided by the legal team as follows:

- 6.1. an application will be made to the Chairperson to compel Mr Zuma to appear before the Commission on dates to be specified. A notice of application will be served on yourself in due course. The application will ask the Chairperson to authorise the issue of a summons in terms of the provisions of the Commissions Act of 1947 to appear before the Commission and be examined from 27 January 2020 to 31 January 2020, both dates inclusive. This application will be set down for hearing before the Chairperson at 10h00am on Tuesday, 14 January 2020.
- 6.2. no further "areas of interest" communications will be addressed to Mr Zuma;
- 6.3. since he gave evidence in July 2019, Mr Zuma has been provided with a number of affidavits of witnesses who have given evidence or who will give evidence concerning him and in respect of which the Commission requires to hear his version and to question him. Mr Zuma has also been provided with notices in terms of Rule 3.3 of the Commission's rules where his attention has been drawn to evidence led or to be led before the Commission, which evidence implicates him. Mr Zuma will be requested to consider this evidence and to prepare himself to answer questions thereon before returning to the Commission to conclude his evidence;
- 6.4. documentation containing the results of the Commission's investigations into matters relevant to Mr Zuma's evidence may be provided to Mr Zuma in due course. However Mr Zuma will be given adequate opportunity to prepare himself to respond thereto.
7. Please regard the contents of this letter, and in particular paragraph 6.1 above, as due notice of the contemplated application.



PJ PRETORIUS

Head of the Legal Team

**Judicial Commission of Inquiry into Allegations
of State Capture, Corruption and Fraud
in the Public Sector including Organs of State**



"JG2264"

info

From: Warren Redcliffe <WarrenR@commissionsc.org.za>
Sent: Tuesday, 17 December 2019 10:48 AM
To: dan@lugisanimantshaattorneys.co.za
Cc: Dayna Arnoldi; Shannon S. Van Vuuren; Sabina Lech; Boipelo B. Ratshikana; Samukelisiwe Jali
Subject: Recall: Judicial Commission of Inquiry into Allegations of State Capture // Former President Mr. JG Zuma

Warren Redcliffe would like to recall the message, "Judicial Commission of Inquiry into Allegations of State Capture // Former President Mr. JG Zuma".

