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

NOTICE OF APPLICATION

TAKE NOTICE THAT the Legal Team of the Judicial Commission of Inquiry into Allegations of State Capture, Corruption and Fraud in the Public Sector including Organs of State ("the Commission") intends applying to the Chairperson at 10h00 on Tuesday, 14 January 2020, or so soon thereafter as the matter may be heard for an order in the following terms:

- Directing and authorising the Acting Secretary of the Commission to sign and issue a summons in respect of the Respondent, the former President, Mr Jacob Gedleyihlekisa Zuma ("Mr Zuma"), in the form of and in terms of annexure 'A' hereto;
- Directing that the summons be made subject to such conditions or directives as the Chairperson may determine; and
- 3. Granting further, other or alternative relief.

TAKE NOTICE FURTHER that should the Respondent wish to oppose this application he should notify the Acting Secretary of the Commission on or before 6 January 2020, and at the same time deliver an affidavit to the Acting Secretary, setting out the grounds of such opposition and the facts relevant thereto.

TAKE NOTICE FURTHER that the affidavit of MS KWEZI BRIGITTE SHABALALA attached hereto will be used in support of this application.

PJ PRETORIUS Head of the Legal Team

TO

: The Honourable Chairperson

The Judicial Commission of Inquiry into Allegations of State Capture, Corruption

and Fraud in the Public Sector including

Organs of State

Hillside House

17 Empire Road, Parktown

AND TO

: Mr. J.G. Zuma c/o Lugisani Mantsha Attorneys

First Floor, Burnside Island

Block 6, 410 Jan Smuts Avenue

Craighall

Johannesburg

Ref: Mr D Mantsha LW0257/18/C

By E-mail:

info@lugisanimantshaatterneys.co.za & dan@lugisanimantshaattemeys.co.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

SUPPORTING AFFIDAVIT

INTRODUCTION

I, the undersigned,

KWEZI BRIGITTE SHABALALA

do hereby state under oath that:

- I am an adult female employed as the Acting Secretary of the Judicial Commission of Inquiry into Allegations of State Capture, Corruption and Fraud in the Public Sector including Organs of State ("the Commission") with its main place of business situated at Hillside House, 17 Empire Road, Parktown, Johannesburg.
- I am duly authorised to depose to this affidavit.
- All the facts stated herein are, unless the context indicates otherwise, within my own personal knowledge and are to the best of my belief both true and correct.
- 4. Where I make legal submissions, I do so on the advice of the Legal Team of the Commission. I believe such advice to be correct.
- 5. All correspondence that I refer to in this affidavit is in the possession or under the control of the office of the Secretariat of the Commission. I have not attached same to this affidavit. It is already in the possession of the Respondent, former President Mr J G Zuma. I will however make a bundle of relevant correspondence available to the Chairperson and the parties at the hearing of this Application.



- This is an application by the Legal Team of the Commission to request the Chairperson
 of the Commission to take the necessary steps to cause a summons to be issued to
 secure the appearance of Mr Zuma at further hearings of the Commission.
- Since the commencement of the hearings of the Commission in August 2018, several witnesses have given evidence concerning and implicating Mr Zuma.
- 8. 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.
- 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.
- 10. On 13 September 2018, and at a public hearing of the Commission, the Chairperson 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.
- 11. On 11 October 2018, the Commission was informed in writing by Mr Zuma's attorneys that Mr Zuma was attending to the matter and that they had written to the Presidency requesting to be provided with the necessary records so that Mr Zuma could assist the Commission. They stated that they would revert thereafter.
- 12. On 26 April 2019, the Chairperson addressed a letter to Mr Zuma's attorneys to note the Commission's "deep concern" that despite the passage 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.
- 13. To date, Mr Zuma has not provided the affidavit requested.



- 14. On 2 May 2019, the Chairperson addressed a letter dated 30 April 2019 to Mr Zuma's attorneys 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."
- 15. The letter dated 30 April 2019 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.
- 16. A further letter attaching a list of witnesses in regard to whose evidence Mr Zuma would be asked questions was sent to his attorneys on 6 May 2019.
- 17. On 20 June 2019, a letter was sent to Mr Zuma's attorneys 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)
- On 24 June 2019, Mr Zuma undertook in writing to appear before the Commission from 15 July 2019 to 19 July 2019.



- 19. 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.
- 20. 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:
- 20.1. the decision that Mr Zuma would no longer participate in the proceedings was withdrawn;
- 20.2. Mr Zuma and his legal team wished to continue to cooperate with the Commission;
- 20.3. 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";
- 20.4. 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";
- 20.5. 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; and
- 20.6. 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.
- 21. Pursuant to the agreed arrangement and on 30 July 2019, the Legal Team, through Advocate Paul Pretorius, addressed an email to Advocate Muzi Sikhakhane 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. Advocate Muzi Sikhakhane confirmed receipt of the email on the same day.
- 22. In a letter dated 16 August 2019, Mr Zuma's attorneys informed the Commission, amongst other things, that they were "in the process of responding to the issues raised" in the letter of 30 July 2019.
- 23. On 27 August 2019, Advocate Sikhakhane addressed a WhatsApp note to Advocate Paul Pretorius 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."

- 24. To date, no such response has been received.
- 25. On 10 September 2019, a letter was addressed to Mr Zuma's attorneys 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 might do if sound and cogent reasons were provided to him.
- 26. On 11 September 2019, the Legal Team, through Advocate Paul Pretorius, addressed a letter to Mr Zuma's attorneys which, amongst other things, reminded them that the Chairperson still required Mr Zuma's response to the "areas of interest" letter dated 30 July 2019 (erroneously typed as "03" July 2019).
- 27. On 12 September 2019, Mr Zuma's attorneys replied to the writer's letter of
 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".
- 28. By way of a letter dated 13 September 2019, Mr Zuma was requested, through his attorneys, 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.
- 29. Mr Zuma did not appear as directed.



- 30. On 17 September 2019, Mr Zuma's attorneys 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". The 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".
- 31. On 30 September 2019, an email attaching a letter dated 27 September 2019 was forwarded to Mr Zuma's attorneys 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."
- 32. 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."
- 33. On 30 September 2019, a further letter dated 27 September 2019 was emailed to Mr Zuma's attorneys. 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.
- 34. On 30 September 2019, Mr Zuma's attorneys reminded the Commission of their 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.



- 35. By way of a letter from Mr Zuma's attorneys dated 30 September 2019, Mr Zuma confirmed his commitment to appear before the Commission from 11 November 2019 to 15 November 2019.
- 36. 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.
- 37. On 15 October 2019, Mr Zuma's attorneys 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. ...[That 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.
 - 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.
 - 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."
- 38. On 24 October 2019, the Commission sent a copy of an application to Mr Zuma's attorneys, which it had received from Ms Redihentse Tlhabi ("Ms Tlhabi"), for Mr Zuma's written comments. Ms Tlhabi, through her attorneys, had applied to give written and oral evidence and cross-examine Mr Zuma on aspects of his testimony tendered before the Commission on 15 July 2019 and which related to her.
- 39. On 28 October 2019, Mr Zuma's attorneys sent his notice of intention to oppose Ms Tlhabi's application to cross-examine him. Mr Zuma did not deliver a written response to the assertions made in the Tlhabi application.



- 40. On 31 October 2019, the Commission sent a reminder email to Mr Zuma's attorneys calling for his written response to the Thabi application, which response was due on the same date.
- 41. On 31 October 2019, Mr Zuma's attorneys informed the Commission, amongst other things, that Mr Zuma was unable to provide his statement in response to the Tihabi application "at this stage".
- 42. On 1 November 2019, Mr Zuma informed the Commission, through his attorneys, 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.
 - 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."
- 43. On 4 November 2019, the Commission wrote to Mr Zuma's attorneys requesting that his written comments to the Tlhabi application be provided within a specified time period. In a letter dated 15 November 2019, this request was withdrawn.
- 44. On 6 November 2019, Mr Zuma's attorneys informed the Commission by letter that in respect of Mr Zuma's response to the Tlhabi application:
 - "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".
- 45. On 3 December 2019, the Chairperson publicly announced the following directions in respect of the Tlhabi application:
 - "1.1 If the Former President, Mr Jacob Zuma, wishes to say anything in opposition to Ms. Redihentse Thabi'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 matter 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 Tihabi'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 Tihabi, if necessary, to respond to those written submissions in which case the matter will be decided at a later date."
- 46. On the same date, 3 December 2019, the directions were sent by letter to the attorneys of both Mr Zuma and Ms Tlhabi.
- 47. On 4 December 2019, Mr Zuma's attorneys informed the Commission by letter that, amongst other things:
 - *2. As we have stated before, Mr Zuma is ill and is currently hospitalized.
 - 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."
- 48. On the same date, the letter received from Mr Zuma's attorneys was sent to the attorneys of Ms Tlhabi for comments on the extension requested. On 12 December 2019, Ms Tlhabi's attorneys stated, amongst other things, that: "As there is no certainty as to when Mr Zuma will be in a position to provide his attorneys with instructions on our client's application, our client would prefer that the matter not be unduly delayed given the serious allegations made against her."
- 49. On 13 December 2019, the Commission emailed a letter to Mr Zuma's attorneys which "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 Mr Zuma before the Commission.
- 50. On 17 December 2019, a letter was sent by the Legal Team, through Advocate Paul Pretorius, to Mr Zuma's attorneys which informed them of its intention to bring this application.
- 51. In the circumstances, Mr Zuma has failed or refused:

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- 51.1. Generally, to abide by the directives of the Chairperson;
- 51.2. to deliver his affidavit(s) contemplated in the terms of agreement announced by the Chairperson in the Commission on 19 July 2019;
- 51.3. to appear at hearings scheduled for his further testimony which resulted in a loss of 3 weeks hearing time, a loss that the Commission can ill afford both in relation to the time and costs involved; and
- 51.4. to approach the Chairperson by way of formal applications to seek rulings excusing non-compliance with his directives.
- 52. The Commission's published Terms of Reference, which define the mandate of the Commission, refer to Mr Zuma both directly and indirectly in several respects. Mr Zuma is expressly referred to in at least 41 of the 9 Terms of Reference and indirectly referred to or affected by the remaining Terms of Reference.
- 53. To date, Mr Zuma has received some 23 notices in respect of evidence which implicated or may implicate him in wrongdoing that falls within the mandate of the Commission. To date, Mr Zuma has neither applied to advance his own version to the relevant allegations against him nor applied to cross-examine any of the relevant witnesses.
- 54. Mr Zuma's version in response to the evidence concerning him is accordingly central to the mandate and investigations of the Commission. It is also necessary for the Commission to take all the steps that it is empowered to take in order to obtain the relevant evidence of Mr Zuma both from a procedural and substantive point of view.
- 55. It appears from all the above that a summons is necessary to secure the appearance of Mr Zuma in order to enable the Commission:
- 55.1. To afford Mr Zuma a final opportunity to exercise his right to be heard and to hear Mr Zuma's version in regard to matters raised in evidence concerning him and which implicate him;
- 55.2. to question Mr Zuma in regard to those matters so as to assist the Commission in assessing the truthfulness of evidence, including his own evidence, placed before the Commission; and

¹ Terms of Reference 1.2, 1.3, 1.4 and 1.9



- 55.3. generally to conclude the work of the Commission comprehensively and efficiently and in accordance with a reliable and practicable timetable.
- 56. Section 3(2) read with section 3(1) of the Commissions Act² empowers the secretary of the Commission to sign and issue a summons for the purpose of "ascertaining any matter relating to the subject of its investigations". Section 3(1) and (2) read:
 - "3. Commission's powers as to witnesses
 - (1) For the purpose of ascertaining any matter relating to the subject of its investigations, a commission shall in the Union have the powers which a Provincial Division of the Supreme Court of South Africa has within its province 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.
 - (2) A summons for the attendance of a witness or for the production of any book, document or object before a commission shall be signed and issued by the secretary of the commission in a form prescribed by the chairman of the commission and shall be served in the same manner as a summons for the attendance of a witness at a criminal trial in a superior court at the place where the attendance or production is to take place.
- 57. In the premises, an order is sought in the terms of the Notice of Application to which this affidavit is attached.

DEPONENT

I certify that the deponent who acknowledges that she knows and understands the contents of this affidavit; that it is the truth to the best of her knowledge and belief and that she has no objection to taking the prescribed oath and regards same as binding on her conscience and the administration of the oath complied with the Regulations contained in Government Gazette No. R1258 of 21 July 1972, as amended. This

² No. 8 of 1947, as amended

DURBAN affidavit is signed and sworn to before me at Johannesburg on this day of December 2019 at 2016 COMMISSIONER OF OATHS SOUTH AFRICAN POLICE SERVICE COMMANDER
DETECTIVE SERVICE CENTRE EX OFFICIO: **FULL NAMES:** 2019 -12- 18 Paulus Sithensis GREENWOOD PARK PHYSICAL ADDRESS: KWAZULU-NATAL SAPS GIREENWOOD 61 Buston Read DESIGNATION: ablain





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

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

Email: inquiries@sastatecapture.org.za
Website: www.sastatecapture.org.za

SUMMONS TO: APPEAR AS A WITNESS

This summons is issued in terms of section 3(2) of the Commissions Act 8 of 1947, read with:

- Proclamation 3 published in Government Gazette No. 41403 on 25 January 2018
- Government Notice No. 105 published in Government Gazette No. 41436 on 9 February 2018 (as amended)
- Rules of the Judicial Commission of Inquiry into Allegations of State Capture,
 Corruption and Fraud in the Public Sector including Organs of State published
 in Government Gazette No. 41774 on 16 July 2018

Tracking reference: TO BE COMPLETED

To the sheriff or his/her deputy of Nkandla

INFORM:

MR, JACOB GEDLEYIHLEKISA ZUMA

TO BE INCLUDED
Insert full physical service address
Address line 1
Address line 2
Address line 3
and care of:
Lugisani Mantsha Attorneys
410 Jan Smuts Avenue
Burnside Island Office Park
Block 6
that he is hereby directed to:

a) appear before the Commission personally at the 4th floor, Hill on Empire, 16 Empire Road, Parktown, Johannesburg from 27 January 2020 to 31 January 2020 (both dates inclusive) at 10h00 on each such day, for the purpose of giving evidence before the Commission and being questioned about evidence already given by him to the Commission and any matter being investigated by the Commission in respect of which he has received notice in terms of the Rules of the Commission, including, but not limited to, the "areas of interest" set out in Annexure "A" hereto.

Your failure to comply with the requirements set out in paragraph a) above without sufficient cause constitutes an offence under section 6(1) of the Commissions Act 8 of 1947, as amended.

DATED aton this	: day o	f 2019
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ACTING SECRETARY:

Judicial Commission of Inquiry into Allegations of State Capture, Corruption and Fraud in the Public Sector including Organs of State



SCHEDULE 'A'

Witness

Mr Themba Maseko

Area of interest

- The communication from 27 former directors general
 to the then Minister of Finance and another, dated
 22 April 2016, and copied to the then President and
 Deputy President. (Exhibit E1 pages 75-81). Mr
 Zuma's knowledge in relation thereto. Any
 consequent action by Mr Zuma.
- The internal investigations by the ANC under the chairmanship of Mr Gwede Mantashe into matters raised in the abovementioned communication.
- The functions of the Government Communications and Information System (Service) (GCIS), particularly in relation to expenditure of government departments on government advertising.
- 4. The establishment by Mr Ajay Gupta and others of the New Age Newspaper and the ANN 7 television news channel. In particular the steps taken by Mr Ajay Gupta to finance the said projects through government advertising. Further, any communication between Mr Zuma and Mr Maseko in regard to the provision of assistance to Mr Ajay Gupta or the Gupta family relating to the above projects or generally.
- 5. Mr Zuma's relationship with members of the Gupta family particularly in relation to assistance of any kind directly or indirectly rendered by Mr Zuma to the Gupta family concerning their business interests. Any benefits received directly or indirectly from the Gupta family by Mr Zuma or any member of Mr Zuma's family.
- The circumstances surrounding Mr Maseko's transfer from GCIS to the Department of Public Service and

Administration during or about January and February 2011, including but not limited to: the reason therefor; the legal powers and duties of the President in relation to the transfer; and any action taken or instruction given by the President in relation to the transfer.

Ms Vytjie Mentor

- The removal of Ms Mentor as chair of the Parliamentary Portfolio Committee of Public Enterprises and the reasons therefor.
- The State visit to China in or about August 2010 and in particular but not limited to: the role any member of the Gupta family played at any stage of the visit; any attempted communication between Ms Mentor and Mr Zuma.
- The "offer" of the position of Minister of Public Enterprises made by a member of the Gupta family to Ms Mentor during or about September or October 2010.
- 4. Mr Zuma's presence or otherwise at the Gupta residence in Saxonwold, Johannesburg during or about September or October 2010 when Ms Mentor was present there and any communication between Mr Zuma and Ms Mentor on that occasion.
- The cabinet reshuffle at the end of October 2010; the dismissal of Ms Hogan. Ms Mentor's evidence in relation thereto.
- Mr Zuma's knowledge of Ms Mentor and his statements in relation thereto during March 2016.
- 7. The criminal charges laid against Mr Zuma and others by Ms Mentor during or about May 2016 and circumstances related thereto.

Ms Barbara Hogan

- The policy of "deployment" in the ANC and the application thereof.
- The circumstances of and surrounding the attempts to have Mr Gama appointed as CEO of Transnet, and the subsequent appointment of Mr Gama as CEO of Transnet Freight Rail.
- The report and other documents sent to Mr Zuma on or about 28 July 2009 by Ms Hogan and the contents thereof.
- The powers and duties of the President in relation to the appointment of Board members and senior executives of State Owned Entities.
- Mr Zuma's conduct in relation to the appointment or proposed appointment of a new Transnet Board and CEO during the latter part of 2010; including but not limited to Ms Hogan's request that the matter be placed before Cabinet.
- The dismissal of Ms Hogan as Minister of Public Enterprises during October 2010 and the reasons therefor.
- The appointment of Mr Gigaba as Minister of Public Enterprises during October 2010. Mr Gigaba's appointments of Transnet Board members senior executives of Transnet during his term of office.
- The circumstances of and surrounding the resignation or termination of service of Mr Jacob Maroga as CEO of Eskom during or about October 2009.
- Ms Hogan's communications to Mr Zuma during or about November 2009 regarding the resignation or continued employment of Mr Maroga and Mr Zuma's response thereto.

- Mr Zuma's conduct in relation to Mr Maroga's position at Eskom during or about November 2009.
- Generally, Mr Zuma's role, in principle and in fact, in respect of dismissals and appointments of SOE Board members and senior executives.
- 12. Mr Zuma's knowledge of the performance of SOE's during his tenure as president and action taken by him in response thereto.

Mr Nhlanhla Nene

- The role and functions of National Treasury in government; National Treasury's vulnerability to attacks; and actual attacks on National Treasury during Mr Nene's tenure as Minister of Finance during 2014 and 2015.
- The report of July or August 2015 entitled "Project
 Spider Web" and its origins and contents. Any action
 taken by Mr Zuma in response thereto or in connection
 therewith.
- Mr Zuma's alleged communications to Mr Nene
 approximately a month prior to the release of the said
 report in regard to "apartheid agents" in Treasury.
- Mr Zuma's communications to Mr Nene regarding the proposed sale of Petronas to PetroSA.
- The offer of the position of Finance Minister to Mr
 Mcebisi Jonas by Mr Ajay Gupta during October 2015
 and Mr Zuma's knowledge thereof.
- The proposed "Nuclear Build Project" as testifled to by
 Mr Nene including but not limited to:
 - 6.1 Its costs and investigations and reports in relation thereto:

- 6.2 The process followed in relation to the procurement of nuclear power plants and related services and facilities:
- 6.3 The financial and economic implications of the Nuclear Build Project and the financial risks associated therewith;
- 6.4 The events in Russia during July 2015 testified to by Mr Nene regarding a proposed nuclear deal, including but not limited to the request made to Mr Nene to sign the letters of intent referred to by Mr Nene in evidence;
- 6.5 The relationship between South Africa and
 Russia in regard to the Nuclear Build Project
 and Mr Zuma's involvement in relation thereto;
- 6.6 The Cabinet decision of 10 June 2015 in relation to the proposed Nuclear Build Project;
- 6.7 The response of Mr Zuma to Mr Nene's refusal to sign the said letters of intent;
- 6.8 The establishment of the joint task team between National Treasury and the Department of Energy, its report and recommendations culminating in meetings held by Mr Zuma and certain cabinet members on 8 December 2015 and in a cabinet meeting held on 9 December 2015. The contents of these meetings and their outcomes.
- The dismissal of Mr Nene and the appointment of Mr Des van Rooyen.
- The reason or reasons for the dismissal of Mr Nene.
 The proposed redeployment of Mr Nene to the BRICS Bank.
- 9. The reason or reasons for the appointment of Mr Des van Rooyen.

- 10. Matters related to South African Airways (SAA).
 - 10.1 Leadership instability of SAA during or about 2015;
 - 10.2 The meeting between Ms Hogan, Ms Myeni and Mr Zuma held in or about November 2015, its contents and outcomes;
 - 10.3 Matters related to the proposal to establish an SAA flight route to Khartoum. Mr Zuma's conduct in relation thereto. Ms Myeni's conduct in relation thereto.

Mr Gordhan

- 1. Mr Gordhan's general comments regarding the nature of the phenomenon "state capture".
- Mr Gordhan's general comments on the role played by National Treasury in our constitutional state. The relationship between the President and his Minister of Finance – the need for a close and functional relationship.
- 3. The interactions between Mr Zurna and Mr Gordhan in relation to the Nuclear Build Project.
- The restructuring of the SAA Airbus deal. The interactions between Mr Zuma and Mr Gordhan in relation thereto.
- Matters related to the SAA Board and appointments thereto during or about 2015 and Ms Myeni's continued tenure as Chairperson thereof.
- 6. The investigation into the conduct of Mr Gordhan by the Hawks during or about February 2016. Mr Zuma's interactions with Mr Gordhan in this regard. The meeting of senior ANC officials held on 22 February 2016. The participation of Mr Zuma in that meeting. The outcome of that meeting and what

- followed in relation to the matters discussed at that meeting.
- Matters related to the dismissal of Mr Nene during
 December 2015 addressed in Mr Gordhan's evidence.
- Matters related to the subsequent appointment of Mr
 Van Rooyen during December 2015 addressed in Mr
 Gordhan's evidence,
- The relationship between Mr Tom Moyane and Mr Gordhan. Mr Zuma's knowledge thereof and his actions in relation thereto.
- Matters related to proposed amendments to the Financial Intelligence Centre Act. Mr Zuma's conduct in relation thereto. Mr Gordhan's evidence in relation thereto.
- 11. The announcement by Advocate Abrahams of charges against Mr Gordhan on 11 October 2016 and Mr Zuma's knowledge thereof.
- 12. The banks' closure of Gupta related bank accounts during or about April 2016 and the response of the National Executive thereto.
- 13. Mr Gordhan's dismissal as Minister of Finance in March 2017 and the reasons therefor. The matter of the "Operation Checkmate" report and Mr Zuma's conduct in relation thereto. Mr Zuma's alleged reliance thereon.
- 14. The occasion on which Mr Zuma introduced Mr Ajay
 Gupta to Mr Gordhan during Mr Gorhan's first term as
 Minister of Finance as testified to by Mr Gordhan.
- 15. Mr Gordhan's evidence concerning State Owned Enterprises; their corporate governance; performance; financial losses; operational capability; corruption.

Advocate N A Ramatlhodi

- Whilst Mr Ramatlhodi was Minister of Mineral Resources and during the period 25 May 2014 to 23 September 2015:
 - 1.1. The request by Mr Duduzane Zuma to Mr
 Ramatlhodi to attend to the apparent closure of
 a Gupta-owned mine for safety reasons. Mr
 Ramatlhodi's subsequent discussion of this
 issue with Mr Zuma.
 - 1.2 The request by Dr Ngubane to Mr Ramatlhodi to shut down all Glencore owned mines. Mr Brian Molefe's involvement therein. The involvement in or knowledge of such matters on the part of Mr Zuma.
 - 1.3 The dismissal of Mr Ramatihodi as Minister of Mineral Resources in September 2015 and the reasons therefor.

Mr Mahlodi Sam Muofhe

- The meeting between Mr Muofhe and Mr Zuma during or about March 2015. The contents of the meeting particularly in regard to the proposed appointment of Mr Muofhe as head of the NPA and in regard to Mr Zuma's reason for terminating or otherwise bringing to an end the services of Mr Nxasana.
- The proposed appointment of Mr Mzwanele Manyi as
 Director-General of the Department of Mineral
 Resources. Mr Zuma's involvement therein and his
 response to the failure or refusal of Mr Ramatihodi so
 to appoint Mr Manyi.

Mr Fikile Mbalula

 The ANC NEC meeting of August 2011 and what took place during that meeting. In particular, Mr Mbalula's version of what he told the meeting of his encounter with Mr Ajay Gupta. Mr Zuma's response thereto. Any action taken by Mr Zuma on account of what was said at the meeting and the concerns there raised.

Mr Angelo Agrizzi

- Payments made to Ms Dudu Myeni for onward payment to the Jacob Zuma Foundation. Any benefit that Ms Myeni received from the Jacob Zuma Foundation.
- 2. The relationship between Mr Zuma and Mr Gavin Watson (the Chief Executive Officer of the Bosasa group of companies). Any benefits Mr Zuma, or the African National Congress (ANC), received from Mr Watson or the Bosasa group of companies.
- Visits by Mr Zuma to the Bosasa Office Park. The hosting of ANC functions by Bosasa, including a Cabinet Lekgotla. The hosting of functions for Mr Zuma such as his birthday party in 2015 in Durban.
- 4. The meeting at Nkandla in July 2014 between Mr Zuma, Ms Dudu Myeni, Mr Gavin Watson, Mr Phillip O'Quigley (Falcon Oil and Gas chairman) and attorney Ms Lizel Oberholzer, in relation to a proposed change of legislation or regulations concerning fracking in the Karoo. The subsequent promulgation of the Regulations for Petroleum Exploration and Production on 03 June 2015, issued in terms of the Mineral and Petroleum Resources Development Act, 28 of 2002.
- The involvement of Mr Zuma with Law Enforcement Agencies including the Hawks, the Special Investigations Unit and the National Prosecuting Authority and their officials in relation to their investigations into Bosasa. Any discussion with officials from the Department of Correctional Services, such as Mr Linda Mti in relation thereto. Any discussion with Mr Watson in this regard, particularly

- during 2017. Mr Zuma's knowledge of Ms Myeni's conduct in this regard as testified to by Mr Agrizzi.
- Mr Zuma's knowledge of any corrupt relationship between officials of the Department of Correctional Services and the Bosasa group of companies.

Matters arising from the above areas of interest

- A history of the relationship between Mr Zuma, Mr Ajay Gupta, Mr Tony Gupta and other Gupta family members.
- Any involvement of Mr Zuma In the appointment of his son, Mr Duduzane Zuma, into positions within Gupta related entities.
- Any financial benefits received by Mr Zuma or any
 of his other family members from Mr Duduzane Zuma
 as a result of his shareholding or positions within Gupta
 related entities.
- 4. Excluding the benefits derived by Mr Duduzane Zuma from his positions within Gupta related entities, any financial or other benefits received by Mr Zuma or any of his family members from any of the Gupta family members or Gupta related entities.
- Knowledge of the companies and service providers involved or potentially to be involved in the Nuclear Build Project. The ownership of the uranium mine or mines related or potentially related to the Nuclear Build Project.
- 6. The declarations of interests and benefits received, made by Mr Zuma to the Parliamentary Ethics Committee over the period 2009 to 2018, being benefits received in addition to his income as President of the Republic of South Africa.

7. The President's role and responsibilities in the appointment or removal of Cabinet Ministers, Directors Generals or Heads of Government Departments, Board members and Executive Officers of State Owned Entities.



From: Warren Redcliffe

Sent: Thursday, 19 December 2019 15:16

To: 'Dayna Arnoldi'

Cc: dan@lugisanimantshaattorneys.co.za

Subject: FW: Judicial Commission of Inquiry into Allegations oF State Capture // Mr. JG

Zuma - RESEND

Attachments: Annexure A to Summons 19 12 2019.pdf; Signed Affidavit Ms Shabalala 19 Dec

2019.pdf; Notice of App signed 19 12 2019.pdf; JGZ Summons_19 12 2019.pdf

Dear Madam.

Urgent documentation attached for your attention.

Yours sincerely.

Warren Redcliffe

From: Warren Redcliffe

Sent: Thursday, 19 December 2019 15:08

To: 'Dayna Arnoldi' <info@lugisanimantshaattorneys.co.za>

Cc: dan@lugisanimantshaattorneys.co.za; Shannon S. Van Vuuren <ShannonV@commissionsc.org.za>; Sabina Lech <SabinaL@commissionsc.org.za>; Boipelo B. Ratshikana <BoipeloR@commissionsc.org.za>; Andre J. Lamprecht

<andrel@commissionsc.org.za>

Subject: Judicial Commission of Inquiry into Allegations of State Capture // Mr. JG Zuma

Dear Madam.

Urgent documentation attached for your 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 | lwww.sastatecapture.org.za



From: Microsoft Outlook

To: Dayna Arnoldi; dan@lugisanimantshaattorneys.co.za

Sent: Thursday, 19 December 2019 15:19

Subject: Relayed: FW: Judicial Commission of Inquiry into Allegations oF State Capture // Mr.

JG Zuma - RESEND

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

Dayna Arnoldi (info@lugisanimantshaattorneys.co.za)

dan@lugisanimantshaattorneys.co.za (dan@lugisanimantshaattorneys.co.za)

Subject: FW: Judicial Commission of Inquiry into Allegations oF State Capture // Mr. JG Zuma - RESEND



From: info <info@lugisanimantshaattorneys.co.za>

To: Warren Redcliffe

Sent: Friday, 03 January 2020 17:44

Subject: Read: Judicial Commission of Inquiry into Allegations oF State Capture // Mr. JG

Zuma - RESEND

Your message

To: Dayna Arnoldi

Cc: dan@lugisanimantshaattorneys.co.za

Subject: FW: Judicial Commission of Inquiry into Allegations oF State Capture // Mr. JG Zuma - RESEND

Sent: 2019/12/19 3:16 PM

was read on 2020/01/03 5:43 PM.

From: dan <dan@lugisanimantshaattorneys.co.za>

To: Warren Redcliffe

Sent: Monday, 06 January 2020 12:13

Subject: Read: Judicial Commission of Inquiry into Allegations oF State Capture // Mr. JG

Zuma - RESEND

Your message

To: Dayna Arnoldi

Cc: dan@lugisanimantshaattorneys.co.za

Subject: FW: Judicial Commission of Inquiry into Allegations oF State Capture // Mr. JG Zuma - RESEND

Sent: 2019/12/19 3:16 PM

was read on 2020/01/06 12:11 PM.

DAY 12, 13 SEPTEMBER 2018

CHAIRPERSON: Okay.

<u>ADV PAUL PRETORIUS SC</u>: Then, in relation to further proceedings, we need to plan in accordance with your directions and we will notify the Chair as soon as possible after we have completed that exercise.

CHAIRPERSON: Thank you, thank you. Before we adjourn, I just want to raise something. It was announced I think sometime last week that the former President Jacob Zuma had taken the view that he is not implicated by any of the witnesses so far and therefore that is why he did not apply for leave to cross-examine anybody. Nevertheless, there are some areas where I would like him to deal with, for example, the evidence by Ms Mentor that while she was at the Gupta residence when she got agitated and became loud, the former President emerged from one of the rooms and they spoke and he walked her to the car as well as the evidence by Mr Maseko that he got a call from the former President on the afternoon on which he was leaving his offices to attend a meeting with a Mr Ajay Gupta.

I have invited the lawyers for the former President and indicated my wish that he could put this in an affidavit or could put his version in regard to those aspects in an affidavit to assist the Commission so I have extended that invitation to the former President to assist the Commission by considering to deposing to an affidavit and deal with those two aspects and his attorney is here and he has undertaken to convey that invitation to him.

That was the last issue that I wanted to raise and unless there is something else, Mr Pretorius, it would appear that we should then adjourn.

ADV PAUL PRETORIUS SC: Yes, just one matter. It won't take much time Chair. I am informed by the legal representatives of Ms Lynne Brown that they persist with their application but on the basis of the record as it stands and there will be no further oral or

Busani Mabunda

From:

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

Sent:

Thursday, 11 October 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 5ir.

Attached please find a letter for your attention.

Kind regards

Yvonne

LUGISANI MANTSHA ATTORNEYS

🖾 info@lugisanimanishaattomeys co.za 🛮 011 781 0099

@ www.ingison.montshoatlomeys.co.20

4 to Jan Smuts Ave Burnside Island Office Park Block 6

This ornal and any lies transmited with it are confidential and intended solely for the use of the individual or addressed, if you have received the equal in error please notify the system manager. This message continue and its intended only for the individual named. If you are not the named addresse you should not observative e-mail. Please notify the sender fremediately by a-mail if you have received this a-mail by relative and delete system. If you are not the intended receiver you are notified that disclosing, copying, distributing or taking an the contents of this information is suicely prohibited.

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First floor Burnside Island | Block 6 | 410 Ian Smuts Ave | Craighall | Iohannesburg 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

- We refer to the invitation extended to the former President by Chairperson of the Commission.
- 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

Boipelo B. Ratshikana

From:

Ouma Thagane

Sent:

Friday, 26 April 2019 17:32

To:

Lugisani Mantsha Attorneys

Cc: Subject: Ouma Thagane; Boipelo B. Ratshikana; Andre A. Lamprecht; Andre Lamprecht FAILURE BY THE FORMER PRESIDENT, MR JG ZUMA TO DELIVER AN AFFIDAVIT

REQUESTED BY THE CHAIRPERSON

Attachments:

SKM_75819042617210.pdf

Importance:

High

Dear Mr Lungisani Mantsha

Kindly receive the attached letter for your urgent attention.

Warm regards

Ouma Gloria Thagane
OFFICE MANAGER

COMMISSION OF INQUIRY INTO STATE CAPTURE |Hillside House, 200 Floor, 17 Empire

Road, Parktown,

Johannesburg, 2193|Gauteng| South Africa|

email: oumat@commissionsc.org.za | www.sastatecapture.org.za

Tel: 010-214-0651 Cel: 060-790-4525





2nd floor, Hitlside House 17 Empire Road, Parktown 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

26 April 2019

Mr Lungisani Mantsha Lungisani Mantsha Attorneys 1st ftoor 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.
- 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

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

From: Ouma Thagane < OumaT@commissionsc.org.za>

Sent: Thursday, 02 May 2019 09:29

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

Cc: Andre A. Lamprecht <AndreL@commissionsc.org.za>; Ouma Thagane <OumaT@commissionsc.org.za>; Boipelo

B. Ratshikana <BoipeloR@commissionsc.org.za>; Trudi T. McCracken <TrudiM@commissionsc.org.za>

Subject: APPEARANCE OF FORMER PRESIDENT MR JG ZUMA BEFORE THE COMMISSION

Importance: High

Dear Mr Lungisani Mantsha

Kindly receive the attached letter for your urgent attention.

Warm regards

Ouma Gloria Thagane
OFFICE MANAGER

COMMISSION OF INQUIRY INTO STATE CAPTURE |Hillside House, 200 Floor, 17 Empire

Road, Parktown,

Johannesburg, 2193 | Gauteng | South Africa |

email: oumat@commissionsc.org.za | www.sastatecapture.org.za

Tel: 010-214-0651 Cel: 060-790-4525





2nd floor, Hillside House 17 Empire Road, Parktown 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

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

- 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.
- 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.

4. The Commission would appreciate it if written confirmation can be given that Mr Zuma will appear before the Commission on the above dates. It would, therefore, be highly appreciated if you would kindly take instructions from your client on this issue and revert.

Yours sincerely



From: Boipelo B. Ratshikana

Sent: Monday, 06 May 2019 14:18

To: 'dan@lugisanimantshaattorneys.co.za' <dan@lugisanimantshaattorneys.co.za>

Cc: Andre A. Lamprecht <andrel@commissionsc.org.za>; Peter P. Pedlar <PeterP@commissionsc.org.za>; Ouma

Thagane <OumaT@commissionsc.org.za>

Subject: Letter to Lungisani Mantsha Attorneys

Dear Sir /Madam

Please find attached letter for your attention.

Kind Regards,

Bolpelo Ratshikana Executive Assistant to the Secretary COMMISSION OF INQUIRY INTO STATE CAPTURE Hillside House, 2rd Floor, 17 Empire Road, Parktown, Johannesburg, 2193
Tel: 010 214 0651 | Mobile: 071 319 7843 | Email: boipelor@commissionsc.org.za | www.sastatecapture.org.za





2nd floor, Hillside House 17 Empire Road. Parktown Johannesburg 2193

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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

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**

- With reference to our letter dated 30 April 2019, it has come to the attention of the 1. 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.
- It will be highly appreciated if you will inform your client of the contents of this letter 4.

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

From: Peter P. Pedlar < Peter P@commissionsc.org.za>

Sent: Thursday, 20 June 2019 15:52
To: info@lugisanimantshaattorneys.co.za

Cc: Boipelo B. Ratshikana <BoipeloR@commissionsc.org.za>; Ouma Thagane <OumaT@commissionsc.org.za>; Paul P. Pretorius <Paul P@commissionsc.org.za>; Andre A. Lamprecht <Andre L@commissionsc.org.za>; Shannon S. Van

Vuuren <ShannonV@commissionsc.org.za>; Trudi T. McCracken <TrudiM@commissionsc.org.za>

Subject: Appearance of Mr JG Zuma at SC Commission

Dear Mr Lugisani,

Attached please find our letter re the appearance of your client at the State Capture Commission.

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

1



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

Email: inquiries@sastatecapture.org.za Website: www.sastatecapture.org.za

Your ref.: Mr D Mantsha LM0257/18/C

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

Dear Sirs

Re: Appearance of former President, Mr JG Zuma before the Commission

- 1. Your letter of 12 June 2019 refers.
- 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

JGZ-PROC01/2020-APP-048

GEN-CORRESPONDENCE-107



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

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

 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.

JGZ-PROC01/2020-APP-049

GEN-CORRESPONDENCE-108

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.
- 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.



Paul P. Pretorius

From:

Paul P. Pretorius

Sent:

Tuesday, 30 July 2019 12:47

To:

'muzi@pabasa.co.za'; 'muzis@law.co.za'

Subject:

Re: Former President Zuma: Areas of Interest

Attachments:

Letter to Adv Muzi Sikhakhane-30.07.2019.pdf; Schedule A-30.07.2019.pdf

Importance:

High

Dear Advocate Sikhakhane,

Herewith please find attached a letter for your attention.

Best regards,

Advocate Paul Pretorius SC

COMMISSION OF INQUIRY INTO STATE CAPTURE | Hillside House, 3rd Floor, 17 Empire Road, Parktown,

Johannesburg, 2193 | Gauteng | South Africa | mobile: 060 784 8517

email: paulp@commissipnsc.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

30 July 2019

Dear Advocate Sikhakhane.

By email: muzis/plaw.co.za

muzi@pabasa.co.za

RE: FORMER PRESIDENT ZUMA: AREAS OF INTEREST

- 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.
- 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.
- 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.

- 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.
- 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,

Paul Pretorius
Head of the Legal Team
State Capture Commission

SCHEDULE 'A'

Witness

Mr Themba Maseko

Area of interest

- The communication from 27 former directors general
 to the then Minister of Finance and another, dated
 22 April 2016, and copied to the then President and
 Deputy President. (Exhibit E1 pages 75-81). Mr
 Zuma's knowledge in relation thereto. Any
 consequent action by Mr Zuma.
- 2. The internal investigations by the ANC under the chairmanship of Mr Gwede Mantashe into matters raised in the abovementioned communication.
- 3. The functions of the Government Communications and Information System (Service) (GCIS), particularly in relation to expenditure of government departments on government advertising.
- 4. The establishment by Mr Ajay Gupta and others of the New Age Newspaper and the ANN 7 television news channel. In particular the steps taken by Mr Ajay Gupta to finance the said projects through government advertising. Further, any communication between Mr Zuma and Mr Maseko in regard to the provision of assistance to Mr Ajay Gupta or the Gupta family relating to the above projects or generally.
- Mr Zuma's relationship with members of the Gupta family particularly in relation to assistance of any kind directly or indirectly rendered by Mr Zuma to the Gupta family concerning their business interests. Any benefits received directly or indirectly from the Gupta family by Mr Zuma or any member of Mr Zuma's family.
- The circumstances surrounding Mr Maseko's transfer from GCIS to the Department of Public Service and

Administration during or about January and February 2011, including but not limited to: the reason therefor; the legal powers and duties of the President in relation to the transfer; and any action taken or instruction given by the President in relation to the transfer.

Ms Vytjie Mentor

- The removal of Ms Mentor as chair of the Parliamentary Portfolio Committee of Public Enterprises and the reasons therefor.
- The State visit to China in or about August 2010 and in particular but not limited to: the role any member of the Gupta family played at any stage of the visit; any attempted communication between Ms Mentor and Mr Zuma.
- The "offer" of the position of Minister of Public Enterprises made by a member of the Gupta family to Ms Mentor during or about September or October 2010.
- 4. Mr Zuma's presence or otherwise at the Gupta residence in Saxonwold, Johannesburg during or about September or October 2010 when Ms Mentor was present there and any communication between Mr Zuma and Ms Mentor on that occasion.
- The cabinet reshuffle at the end of October 2010; the dismissal of Ms Hogan. Ms Mentor's evidence in relation thereto.
- Mr Zuma's knowledge of Ms Mentor and his statements in relation thereto during March 2016.
- The criminal charges laid against Mr Zuma and others by Ms Mentor during or about May 2016 and circumstances related thereto.

Ms Barbara Hogan

- The policy of "deployment" in the ANC and the application thereof.
- The circumstances of and surrounding the attempts to have Mr Gama appointed as CEO of Transnet, and the subsequent appointment of Mr Gama as CEO of Transnet Freight Rail.
- The report and other documents sent to Mr Zuma on or about 28 July 2009 by Ms Hogan and the contents thereof.
- 4. The powers and duties of the President in relation to the appointment of Board members and senior executives of State Owned Entities.
- 5. Mr Zuma's conduct in relation to the appointment or proposed appointment of a new Transnet Board and CEO during the latter part of 2010; including but not limited to Ms Hogan's request that the matter be placed before Cabinet.
- The dismissal of Ms Hogan as Minister of Public Enterprises during October 2010 and the reasons therefor.
- The appointment of Mr Gigaba as Minister of Public Enterprises during October 2010. Mr Gigaba's appointments of Transnet Board members senior executives of Transnet during his term of office.
- The circumstances of and surrounding the resignation or termination of service of Mr Jacob Maroga as CEO of Eskom during or about October 2009.
- Ms Hogan's communications to Mr Zuma during or about November 2009 regarding the resignation or continued employment of Mr Maroga and Mr Zuma's response thereto.

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- Mr Zuma's conduct in relation to Mr Maroga's position at Eskom during or about November 2009.
- Generally, Mr Zuma's role, in principle and in fact, in respect of dismissals and appointments of SOE Board members and senior executives.
- Mr Zuma's knowledge of the performance of SOE's during his tenure as president and action taken by him in response thereto.

Mr Nhianhia Nene

- The role and functions of National Treasury in government; National Treasury's vulnerability to attacks; and actual attacks on National Treasury during Mr Nene's tenure as Minister of Finance during 2014 and 2015.
- The report of July or August 2015 entitled "Project
 Spider Web" and its origins and contents. Any action
 taken by Mr Zuma in response thereto or in connection
 therewith.
- Mr Zuma's alleged communications to Mr Nene
 approximately a month prior to the release of the said
 report in regard to "apartheid agents" in Treasury.
- Mr Zuma's communications to Mr Nene regarding the proposed sale of Petronas to PetroSA.
- The offer of the position of Finance Minister to Mr
 Mcebisi Jonas by Mr Ajay Gupta during October 2015
 and Mr Zuma's knowledge thereof.
- The proposed "Nuclear Build Project" as testified to by Mr Nene including but not limited to:
 - 6.1 Its costs and investigations and reports in relation thereto;

- 6.2 The process followed in relation to the procurement of nuclear power plants and related services and facilities;
- 6.3 The financial and economic implications of the Nuclear Build Project and the financial risks associated therewith;
- 6.4 The events in Russia during July 2015 testified to by Mr Nene regarding a proposed nuclear deal, including but not limited to the request made to Mr Nene to sign the letters of intent referred to by Mr Nene in evidence:
- 6.5 The relationship between South Africa and Russia in regard to the Nuclear Build Project and Mr Zuma's involvement in relation thereto;
- 6.6 The Cabinet decision of 10 June 2015 in relation to the proposed Nuclear Build Project;
- 6.7 The response of Mr Zuma to Mr Nene's refusal to sign the said letters of intent;
- 6.8 The establishment of the joint task team between National Treasury and the Department of Energy, its report and recommendations culminating in meetings held by Mr Zuma and certain cabinet members on 8 December 2015 and in a cabinet meeting held on 9 December 2015. The contents of these meetings and their outcomes.
- The dismissal of Mr Nene and the appointment of Mr Des van Rooyen.
- The reason or reasons for the dismissal of Mr Nene.
 The proposed redeployment of Mr Nene to the BRICS Bank.
- The reason or reasons for the appointment of Mr Des van Rooyen.

- Matters related to South African Airways (SAA).
 - 10.1 Leadership instability of SAA during or about 2015;
 - 10.2 The meeting between Ms Hogan, Ms Myeni and Mr Zuma held in or about November 2015, its contents and outcomes;
 - 10.3 Matters related to the proposal to establish an SAA flight route to Khartoum. Mr Zuma's conduct in relation thereto. Ms Myeni's conduct in relation thereto.

Mr Gordhan

- Mr Gordhan's general comments regarding the nature of the phenomenon "state capture".
- Mr Gordhan's general comments on the role played by National Treasury in our constitutional state. The relationship between the President and his Minister of Finance – the need for a close and functional relationship.
- The interactions between Mr Zuma and Mr Gordhan in relation to the Nuclear Build Project.
- The restructuring of the SAA Airbus deal. The interactions between Mr Zuma and Mr Gordhan in relation thereto.
- Matters related to the SAA Board and appointments thereto during or about 2015 and Ms Myeni's continued tenure as Chairperson thereof.
- 6. The investigation into the conduct of Mr Gordhan by the Hawks during or about February 2016. Mr Zuma's interactions with Mr Gordhan in this regard. The meeting of senior ANC officials held on 22 February 2016. The participation of Mr Zuma in that meeting. The outcome of that meeting and what

- followed in relation to the matters discussed at that meeting.
- Matters related to the dismissal of Mr Nene during
 December 2015 addressed in Mr Gordhan's evidence.
- Matters related to the subsequent appointment of Mr Van Rooyen during December 2015 addressed in Mr Gordhan's evidence.
- The relationship between Mr Tom Moyane and Mr Gordhan. Mr Zuma's knowledge thereof and his actions in relation thereto.
- Matters related to proposed amendments to the Financial Intelligence Centre Act. Mr Zuma's conduct in relation thereto. Mr Gordhan's evidence in relation thereto.
- 11. The announcement by Advocate Abrahams of charges against Mr Gordhan on 11 October 2016 and Mr Zuma's knowledge thereof.
- 12. The banks' closure of Gupta related bank accounts during or about April 2016 and the response of the National Executive thereto.
- 13. Mr Gordhan's dismissal as Minister of Finance in March 2017 and the reasons therefor. The matter of the "Operation Checkmate" report and Mr Zuma's conduct in relation thereto. Mr Zuma's alleged reliance thereon.
- 14. The occasion on which Mr Zuma introduced Mr Ajay
 Gupta to Mr Gordhan during Mr Gorhan's first term as
 Minister of Finance as testified to by Mr Gordhan.
- 15. Mr Gordhan's evidence concerning State Owned Enterprises; their corporate governance; performance; financial losses; operational capability; corruption.

Advocate N A Ramathodi

- Whilst Mr Ramatihodi was Minister of Mineral Resources and during the period 25 May 2014 to 23 September 2015:
 - 1.1. The request by Mr Duduzane Zuma to Mr
 Ramatlhodi to attend to the apparent closure of
 a Gupta-owned mine for safety reasons. Mr
 Ramatlhodi's subsequent discussion of this
 issue with Mr Zuma.
 - 1.2 The request by Dr Ngubane to Mr Ramatlhodi to shut down all Glencore owned mines. Mr Brian Molefe's involvement therein. The involvement in or knowledge of such matters on the part of Mr Zuma.
 - 1.3 The dismissal of Mr Ramatlhodi as Minister of Mineral Resources in September 2015 and the reasons therefor.

Mr Mahlodi Sam Muofhe

- 1. The meeting between Mr Muofhe and Mr Zuma during or about March 2015. The contents of the meeting particularly in regard to the proposed appointment of Mr Muofhe as head of the NPA and in regard to Mr Zuma's reason for terminating or otherwise bringing to an end the services of Mr Nxasana.
- The proposed appointment of Mr Mzwanele Manyi as
 Director-General of the Department of Mineral
 Resources. Mr Zuma's involvement therein and his
 response to the failure or refusal of Mr Ramatihodi so
 to appoint Mr Manyi.

Mr Fikile Mbalula

 The ANC NEC meeting of August 2011 and what took place during that meeting. In particular, Mr Mbalula's version of what he told the meeting of his encounter with Mr Ajay Gupta. Mr Zuma's response thereto. Any action taken by Mr Zuma on account of what was said at the meeting and the concerns there raised.

Mr Angelo Agrizzi

- Payments made to Ms Dudu Myeni for onward payment to the Jacob Zuma Foundation. Any benefit that Ms Myeni received from the Jacob Zuma Foundation.
- 2. The relationship between Mr Zuma and Mr Gavin Watson (the Chief Executive Officer of the Bosasa group of companies). Any benefits Mr Zuma, or the African National Congress (ANC), received from Mr Watson or the Bosasa group of companies.
- Visits by Mr Zuma to the Bosasa Office Park. The hosting of ANC functions by Bosasa, including a Cabinet Lekgotla. The hosting of functions for Mr Zuma such as his birthday party in 2015 in Durban.
- 4. The meeting at Nkandla in July 2014 between Mr Zuma, Ms Dudu Myeni, Mr Gavin Watson, Mr Phillip O'Quigley (Falcon Oil and Gas chairman) and attorney Ms Lizel Oberholzer, in relation to a proposed change of legislation or regulations concerning fracking in the Karoo. The subsequent promulgation of the Regulations for Petroleum Exploration and Production on 03 June 2015, issued in terms of the Mineral and Petroleum Resources Development Act, 28 of 2002.
- Agencies including the Hawks, the Special Investigations Unit and the National Prosecuting Authority and their officials in relation to their investigations into Bosasa. Any discussion with officials from the Department of Correctional Services, such as Mr Linda Mti in relation thereto. Any discussion with Mr Watson in this regard, particularly

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- during 2017. Mr Zuma's knowledge of Ms Myeni's conduct in this regard as testified to by Mr Agrizzi.
- Mr Zuma's knowledge of any corrupt relationship between officials of the Department of Correctional Services and the Bosasa group of companies.

Matters arising from the above areas of interest

- A history of the relationship between Mr Zuma, Mr Ajay
 Gupta, Mr Tony Gupta and other Gupta family
 members.
- Any involvement of Mr Zuma in the appointment of his son, Mr Duduzane Zuma, into positions within Gupta related entities.
- Any financial benefits received by Mr Zuma or any
 of his other family members from Mr Duduzane Zuma
 as a result of his shareholding or positions within Gupta
 related entities.
- 4. Excluding the benefits derived by Mr Duduzane Zuma from his positions within Gupta related entities, any financial or other benefits received by Mr Zuma or any of his family members from any of the Gupta family members or Gupta related entities.
- Knowledge of the companies and service providers involved or potentially to be involved in the Nuclear Build Project. The ownership of the uranium mine or mines related or potentially related to the Nuclear Build Project.
- 6. The declarations of interests and benefits received, made by Mr Zuma to the Parliamentary Ethics

 Committee over the period 2009 to 2018, being benefits received in addition to his income as President of the Republic of South Africa.

7. The President's role and responsibilities in the appointment or removal of Cabinet Ministers, Directors Generals or Heads of Government Departments, Board members and Executive Officers of State Owned Entities.



Paul P. Pretorius

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From:

Adv Muzi Sikhakhane <muzi@law.co.za>

Sent:

Tuesday, 30 July 2019 13:02

To:

Paul P. Pretorius

Cc:

muzi@pabasa.co.za; muzis@law.co.za

Subject:

Re: Former President Zuma: Areas of Interest

Dear Adv Pretorius

I acknowledge receipt of your letter and the attached document. I also refer to our telephonic conversation this morning.

I will discuss it with my team and client and revert back to you.

Have a safe trip.

Sent from my iPhone

On 30 Jul 2019, at 12:47, Paul P. Pretorius < Paul P. Commissions c.org. za > wrote:

Dear Advocate Sikhakhane,

Herewith please find attached a letter for your attention.

Best regards,

Advocate Paul Pretorius SC

COMMISSION OF INQUIRY INTO STATE CAPTURE | Hillside House, 3rd Floor, 17 Empire Road, Parktown, Johannesburg, 2193 | Gauteng | South Africa | mobile: 060 784 8517

email: paulp@commissionsc.org.za | www.sastatecapture.org.za |

<image001.jpg>

<Letter to Adv Muzi Sikhakhane-30.07.2019.pdf>

<Schedule A-30.07.2019.pdf>

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Johannesburg, 2193 Gauteng | South Africa |

Email: shannonv@commissionsc.org.za | lwww.sastatecapture.org.za





From: info@lugisanimantshaattorneys.co.za [mailto:info@lugisanimantshaattorneys.co.za]

Sent: Friday, 16 August 2019 11:41

To: Boipelo B. Ratshikana < Boipelo R@commissionsc.org.za >; Poretorius@commissionsc.org.za; Shannon S, Van

Vuuren <Shannon V@commissionsc.org.za>

Subject: FORMER PRESIDENT, MR. JACOB ZUMA - AREAS OF INTEREST

Dear Sir/Madam,

Attached please find a letter for your attention.

, Kindly acknowledge receipt hereof.

Kind regards, Yvonne

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LUGISANI MANTSHA ATTORNEYS

This important and any field transmitted with it are confidential and elevable delegion of the elevation of an entry to whom stay are addressed if you have received the confidential after store and or interpretate the elevation of the remarks of the recommendate of the remarks of the remark

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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@lugisanimantshaattomeys.co.za | 80x 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

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]

- 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,



Warren Redcliffe

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From: Warren Redcliffe

Sent: Tuesday, 10 September 2019 15:00 To:

'dan@lugisanimantshaattorneys.co.za'; 'info@lugisanimantshaattorneys.co.za' Cc:

Andre J. Lamprecht; Shannon S. Van Vuuren; Samukelisiwe Jali; Lerato L. Buthelezi;

Subject: Judicial Commission of Inquiry into State Capture // Your Client: Former President

Attachments: Letter to Lugisani Mantsha 10 Sept 2019.pdf

Dear Sirs.

Urgent correspondence attached to this e-mail for your 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 | lwww.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

10 September 2019

Our reference: Ms. B.K Shabalala / Ms. L. Buthelezi

To:

Mr. Daniel Mantsha

C/o:

Lugisani Mantsha Attorneys

By email:

dan @lugisanimantshaattomeys.co.za: and

Copy to:

info@lugisanimantsheattorneys.co.ze

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.
- 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



From: Warren Redcliffe

Sent: Wednesday, 11 September 2019 15:38

To: info; dan@lugisanimantshaattorneys.co.za

Cc: Andre J. Lamprecht; Shannon S. Van Vuuren; Sabina Lech; Samukelisiwe Jali; Boipelo

B. Ratshikana

Subject: Judicial Commission of Inquiry into State Capture // Your client: Former President

JG Zuma

Attachments: Letter to Lugisani Mantsha PP 11 Sept 2019.pdf

Dear Sirs.

Correspondence attached for you urgent attention.

Yours faithfully.

Yarren Redcliffe

COMMISSION OF INQUIRY INTO STATE CAPTURE

Hillside House, 17 Empire Road, Parktown, Johannesburg, 2193 Gauteng | South Africa |

Email:warrenr@commissionsc.org.za | lwww.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

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@lugisanimentshaattorneys.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")

- 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.
- 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".
- It is incorrect to state that the said dates were "estimates rather than fixed". Nor did I communicate to your counsel in these terms.
- 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.
- 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.
- 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.
- 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

STAT

From: Warren Redcliffe

Sent: Friday, 13 September 2019 16:40 To:

dan@lugisanimantshaattorneys.co.za

info; Andre J. Lamprecht; Shannon S. Van Vuuren; Sabina Lech; Boipelo B. Cc:

Ratshikana; Paul P. Pretorius; Antoinette A. Griffiths

Judicial Commission of Inquiry into State Capture // Your client: Former President Subject:

Mr. JG Zuma.

Attachments: Letter to Mr. Daniel Mantsha 13 Sept 2019.pdf

Dear Sirs.

Please find attached hereto urgent correspondence for your attention.

Yours faithfully.

Warren Redcliffe

COMMISSION OF INQUIRY INTO STATE CAPTURE

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Email:warrenr@commissionsc.org.za | Iwww.sastatecapture.org.za

STAT





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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@lugisanimantshaattomeys.co.za

Copy to: info@lugisanimantshaattomeys.co.za

Dear Sir,

RE: Evidence: Former President J.G. Zuma

- 1. Previous correspondence in this matter refers.
- 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.
- 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

MS & K SHABALALA

STAT

Acting Secretary

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

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

LUGISANI MANTSHA ATTORNEYS

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the contents of this information is strictly prohibited



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: <u>Poretorius@commissionsc.org.za</u>
And to: <u>ShannonV@commissionsc.org.za</u>

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.

Director: Lugisani Mantsha Bjuris, LLB Lugisani Mantsha Incorporated Reg: 2012/069234/21 4. As soon as that process is complete, he will provide his answers.

Yours faithfully

Mr. L.D MantshaTransmitted electronically without signature



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

174

Shannon S. Van Vuuren

From: info@lu.
Sent: Tuesday

info@lugisanimantshaattorneys.co.za Tuesday, 17 September 2019 09:49

To: Subject: Boipelo B. Ratshikana; Shannon S. Van Vuuren; Ppretorius@commissionsc.org.za

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

LUGISANI MANISHI ATTORNEYS

The erned and any files immenting with it are confidence; and intended sciety for the use of the individual or entity to whom they as addressed. If you have received the entity to whom they as addressed. If you have received the entity to the individual or entity to an entity the entity of the individual confidence in the named addressed you should not determine, distroute or capy to entity. Please not by the sender inviscosity by a mail if you have received the a mail by mistate and delete the a-mail from your the file of the intended recipient you are not the file of the intended recipient you are hotaled that descripe, copying, distributing or taking any according to release on

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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.
- 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.



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From: Boipelo B. Ratshikana

Sent: Monday, 30 September 2019 11:03 **To:** Warren Redcliffe; Shannon S. Van Vuuren

Subject: FW: Letter to Lugisani Mantsha Attorneys/MR D Mantsha LM0257/18/C

Attachments: Scan_20190930_091825.pdf

From: Boipelo B. Ratshikana

Sent: Monday, 30 September 2019 09:40

To: 'info@lugisanimantshaattorneys.co.za' <info@lugisanimantshaattorneys.co.za>; 'dan@lugisanimantshaattorneys.co.za> Subject: Letter to Lugisani Mantsha Attorneys/MR D Mantsha LM0257/18/C

Dear Sir

Please find attached letter for your attention and kindly acknowledge receipt.

OSTA

Kind Regards,

Boipelo Ratshikana
Executive Assistant to the Secretary
COMMISSION OF INQUIRY INTO STATE CAPTURE
Hillside House, 2rd Floor, 17 Empire Road, Parktown, Johannesburg, 2193
Tel: 010 214 0651 I Mobile: 071 319 7843 I Empire Road

Tel: 010 214 0651 | Mobile: 071 319 7843 | Email: boipelor@commissionsc.org.za | www.sastatecapture.org.za





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

Email: inquirles@sastatecauture.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@lugisanimantshaattomeys.co.za dan@lungisanimantshaattomeys.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")

 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.
- Adv Pretorius submitted the Commission's Legal Team's "areas of interest" to Adv Sikhakhane on 30 July 2019.
- 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.
- 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.
- 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

181

Shannon S. Van Vuuren

From:

Boipelo B. Ratshikana

Sent:

Monday, 30 September 2019 11:04

To:

Shannon S. Van Vuuren; Warren Redcliffe

Subject:

FW: Letter to Lugisani Mantsha/MR D Mantsha LM0257/18/C

Attachments:

Scan_20190930_091854.pdf

From: Boipelo B. Ratshikana

Sent: Monday, 30 September 2019 09:46

To: 'dan@lugisanimantshaattorneys.co.za' <dan@lugisanimantshaattorneys.co.za>; 'info@lugisanimantshaattorneys.co.za>

Subject: Letter to Lugisani Mantsha/MR D Mantsha LM0257/18/C

Dear Sir

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, 2rd Floor, 17 Empire Road, Parktown, Johannesburg, 2193

Tel: 010 214 0651 | Mobile: 071 319 7843 | Email: boipelor@commissionsc.org.za | www.sastatecapture.org.za





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@lugisanimantshaattomeys.co.za dan@lungisanimantshaattomeys.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")

- 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 Pietermantzburg 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 on 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



185

From:

Boipelo B. Ratshikana

Sent:

Tuesday, 01 October 2019 11:24

To:

Shannon S. Van Vuuren; Warren Redcliffe; Sabina Lech; Samukelisiwe Jali

Subject:

FW: Letter to LugisaniMantsha Attorneys

Attachments:

Scan_20190930_145431.pdf

From: Boipelo B. Ratshikana

Sent: Monday, 30 September 2019 15:10

To: 'info@lugisanimantshaattorneys.co.za' <info@lugisanimantshaattorneys.co.za>; 'dan@lugisanimantshaattorneys.co.za>

Subject: Letter to LugisaniMantsha Attorneys

Dear Sir/Madam

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, 2rd Floor, 17 Empire Road, Parktown, Johannesburg, 2193

Tel: 010 214 0651 | Mobile: 071 319 7843 | Email: boipelor@commissionsc.org.za | www.sastatecapture.org.za





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

30 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@lungisanimantshaattorneys.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")

 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

STATE

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

ur Buth

COMMISSION 16 AUGUST 2019,pdf

Dear Sir/Madam,

Please find attached hereto a letter for your attention.

Kind regards, Yvonne

LUGISANI MANTSHA ATTORNEYS

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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.
- 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

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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@iugisanimantshaattorneys.co.za | 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

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. 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]

- 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.
- 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,



From: info@lugisanimantshaattorneys.co.za Sent: Tuesday, 01 October 2019 10:56

Boipelo B. Ratshikana; Shannon S. Van Vuuren; Ppretorius@commissionsc.org.za To: 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**

LUGISANI-MANTSHA ATTORNEYS

196



First floor | Burnside Island | Block 6 | 410 Jan Smuts Ave | Craighall | Johannesburg Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: Info@iugisanimantshaattorneys.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")

- 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

- 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

207

Shannon S. Van Vuuren

From: Shannon S. Van Vuuren
Sent: Friday, 04 October 2019 14:17

To: 'info@lugisanimantshaattorneys.co.za'; 'dan@lugisanimantshaattorneys.co.za'
Cc: Andre J. Lamprecht; Boipelo B. Ratshikana; Warren Redcliffe; Lerato L. Buthelezi

Subject: FORMER PRESIDENT JACOB ZUMA // COMMISSION OF INQUIRY INTO

ALLEGATIONS OF STATE CAPTURE

Attachments: Lugisani Mantsha Attorneys 4 Oct 2019.pdf

Tracking: Recipient Delivery Read

'info@lugisanimantshaattorneys.co

'dan@lugisanimantshaattomeys.cr

Andre J. Lamprecht Delivered: 2019/10/04 14:16 Read: 2019/10/04 15:13
Boipelo B. Ratshikana Delivered: 2019/10/04 14:16 Read: 2019/10/04 14:33

Warren Redcliffe Delivered: 2019/10/04 14:16

Lerato L. Buthelezi Delivered: 2019/10/04 14:16 Read: 2019/10/04 16:11

Dear Sirs

Please find the attached letter marked for your attention.

Kindly acknowledge receipt hereof.

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 | lwww.sastatecapture.org.za

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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

04 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 Craighall Johannesburg

Email: info@lugisanimantshaattomeys.co.za dan@lugisanimantshaattomeys.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")

- 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.
- 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.
- the Chairperson has decided to excuse the former President from appearing 2.3 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 Pletermaritzburg 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

Fitt Shelwood

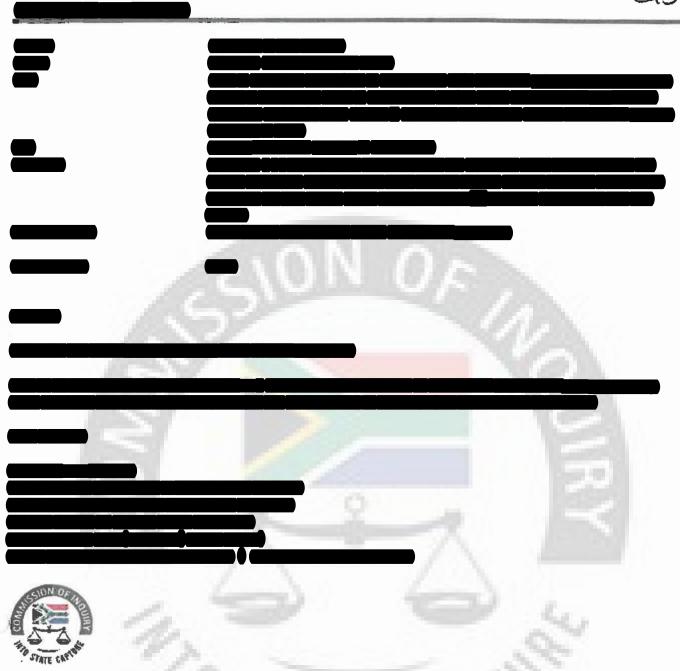
Ms. Brigitte Shabalala

Acting Secretary

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







From: info@lugisanimantshaattorneys.co.za [mailto:info@lugisanimantshaattorneys.co.za]

Sent: Tuesday, 15 October 2019 15:08

To: Boipelo B. Ratshikana <BoipeloR@commissionsc.org.za>; Shannon S. Van Vuuren

<ShannonV@commissionsc.org.za>; 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

Importance: High

Dear Sir/Madam,

Please find attached hereto a letter for your attention.

Kind regards, Yvonne



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: BoipetoR@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

 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.

- 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

From: info@lugisanimantshaattorneys.co.za
Sent: Thursday, 24 October 2019 16:38

To: Shannon S. Van Vuuren; dan@lugisanimantshaattorneys.co.za
Cc: Andre J. Lamprecht; Warren Redcliffe; Boipelo B. Ratshikana
Subject: RE: Redi Tlhabi // Jacob Zuma // State Capture Commission

Dear Madam,

We refer to the above matter and confirm receipt hereof.



From: Shannon S. Van Vuuren <ShannonV@commissionsc.org.za>

Sent: Thursday, 24 October 2019 15:55

To: Info@lugisanimantshaattorneys.co.za; dan@lugisanimantshaattorneys.co.za

Cc: Andre J. Lamprecht < Andre L@commissionsc.org.za>; Warren Redcliffe < Warren R@commissionsc.org.za>;

Boipelo B. Ratshikana < Boipelo R@commissionsc.org.za>

Subject: Redi Tlhabi // Jacob Zuma // State Capture Commission

Dear Sirs

Please find attached hereto Redi Thabi's application in response to your client's testimony before this Commission.

The Commission requires that this application be sent to your client for his comments, if any.

Please provide us with your client's written comments thereto, if any, within 7 (seven) calendar days hereof.

Please feel free to contact me regarding this matter.

Thank you & kind regards,
Shannon Van Vuuren
Legal Advisor: Operations & Investigative Support
COMMISSION OF INOURY INTO STATE CAPTURE

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

LUGISANI MANTSHA ATTORNEYS

This arried and any files transmitted with it are confidence and intended solely for the use of the individual or entary to whom they are estimated if you have received this eried in error please notify the system manager. This measage contains confidental information and as intended only for the individual named. If you are not fire named addresses you should not discernate, distribute or egy the or not. Please notify the entart immediately by a mediff you have received this entail by mistake and delete the eriest zons your system. If you are not the streeted material you are not the streeted medically grant action of the contents of this information is selected in the contents of this information is solicity prohibited.

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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@fugisanimantsheattorneys.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: <u>Ppretorius@commissionsc.org.za</u>
And to: <u>ShannonV@commissionsc.org.za</u>

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

NOTICE TO OPPOSE

KINDLY TAKE NOTICE THAT Mr Jacob Gedleyihlekisa Zuma hereby gives notice of his intention to oppose the application to cross-examine him brought by Ms Redihentse Tihabi.

Dated at Johannesburg on this the 28th day of October 2019.

LUGISANI MANTSHA INCORPORATED

No. 410 Jan Smuts Avenue Burnside Island

Block 6, First Floor Craighall, Johannesburg

P.O Box 1127

Randburg, 2125

Ref: LM Tel: (011) 781 0099

Fax: (011) 781 0526 Ref: Mr. L.D Mantsha LM0257/18/C

info@lugisanimantshaattorneys.co.za

To:

WEBBER WENTZEL

90 Rivonia Road, Sandton Johannesburg,2196 PO Box 61771, Marshalltown

Johannesburg,2107, South Africa

Tel: 011 530 5232 Fax: 011 530 6232

Email: dario.milo@webberwentzel.com

Lavanya.pillay@webberwentzel.com

Ref: D Milo / L Pillay

3035151

And to:

Judicial Commission of Inquiry into Allegation of State Capture, Corruption and Fraud in the Public Sector including Organs of State

2nd Floor Hillside Road

Parktown

Johannesburg

193

Email: frankd@commissionsc.org.za; inquiries@sastatecapture.org.za

From: Shannon S. Van Vuuren

Sent: Thursday, 31 October 2019 11:52 To:

'info@lugisanimantshaattomeys.co.za'; 'dan@lugisanimantshaattomeys.co.za' Cc:

Andre J. Lamprecht; Boipelo B. Ratshikana

RE: REDIHENTSE TLHABI'S NOTICE OF APPLICATION TO CROSS-EXAMINE MR. J.G. Subject:

ZUMA

Attachments: Redi Tlhabi // Jacob Zuma // State Capture Commission

Tracking: Recipient Delivery Read

> info@lugisanimantshaattomeys.co 'dan@lugisanimantshaattorneys.cı

Andre J. Lamprecht Delivered: 2019/10/31 11:51

Boipelo B. Ratshikana Delivered: 2019/10/31 11:51 Read: 2019/10/31 12:06

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 | lwww.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

From:

info@lugisanimantshaattorneys.co.za

Sent:

Thursday, 31 October 2019 17:28

To:

Boipelo B. Ratshíkana; Shannon S. Van Vuuren

Subject:

REDIHENTSE TLHABI'S NOTICE OF APPLICATION TO CROSS-EXAMINE MR. J.G

ZUMA

Attachments:

Letter to the Commission dated 31 October 2019.pdf

Dear Sir/Madam,

Please find attached hereto a letter for your attention.

Kind regards. Yvonne

LUGISANI MANTSHA ATTORNEYS

Z35



First floor | Burnside Island | Block 6 | 410 Jan Smuts Ave | Craighall | Johannesburg Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: | Info@lugisanimentshaattorneys.co.2a | 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: 31 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 your letter dated 31 October 2019 and advise that our client is unable to provide the said statement at this stage.
- In any event we have already furnished you with the notice to oppose the said application, in terms of practice our client is entitled to argue his opposition based on the applicant's application.

Yours Faithfully

Mr. L.D Mantsha Transmitted electronically without signature

From: Lerato L. Buthelezi

Sent: Thursday, 07 November 2019 16:49

To: Shannon S. Van Vuuren

Subject: Fwd: Letter from former President

Attachments: Letter from Mantsha Attorneys 1.11.19.pdf; Letter from Mantsha Attorneys

1,11,19,pdf

Lerato Buthelezi

COMMISSION OF INQUIRY INTO STATE CAPTURE | Hillside House, 3rd Floor, 17 Empire Road, Parktown, Johannesburg, 2193 | Gauteng | South Africa | mobile: 0607739825 | email: leratob@commissionsc.org.za | www.sastatecapture.org.za

From: Lerato L. Buthelezi <leratob@commissionsc.org.za>

Sent: Friday, November 1, 2019 3:00 PM

To: Paul P. Pretorius

Cc: Veruschka V. September

Subject: Letter from former President

Dear Paul

Please find attached a letter from the former President regarding his attendance at the hearings during the week 11 -15 November 2019.

Kind regards

Lerato Buthelezi

COMMISSION OF INQUIRY INTO STATE CAPTURE Hillside House, 3rd Floor, 17 Empire Road, Parktown, Johannesburg, 2193, Gauteng South Africa, email: leratob@commisionsc.org.za, www.sastatecapture.org.za

Cell: 0607739825





First floor | Burnside Island | Block 6 | 410 Jan 5muts Ave | Craignal | Johannesburg | Tel: 411 781 6899 | Fax: 611 781 6526 | 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

- 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.

Director: Lugisani Mantsha Bjuris, LLB Lugisani Mantsha incorporated Reg: 2012/069234/21 Yours Faithfully

Mr. L.D Mantsha



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

Shannon S. Van Vuuren

From:

Boipelo B. Ratshikana

Sent:

Monday, 04 November 2019 15:19

To:

info@lugisanimantshaattorneys.co.za; dan@lugisanimantshaattorneys.co.za

Subject:

Letter to Lugisani Mantsha Attorneys

Attachments:

Scan_20191104_151419.pdf

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, 2rd Floor, 17 Empire Road, Parktown, Johannesburg, 2193
Tel: 010 214 0651 | Mobile: 071 319 7843 | Email: boipelor@commissionsc.org.za | www.sastatecapture.org.za





2nd floor, Hillside House 17 Empire Road. Parktown 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

4 November 2019

Your Ref.

: Mr D Mantsha LM0257/18/C

Lungisani Mantsha Attorneys First Floor Burnside Island Block 6 410 Jan Smuts Ave Craighall, Johannesburg

E-mail

:info@lungisanimantshaattorneys.co.za /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 Tihabi's application to give evidence and cross-examine your client dated 27 September 2019.

The DCJ has directed your client to respond to Ms Thabi'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

From: info@lugisanimantshaattorneys.co.za
Sent: Wednesday, 06 November 2019 13:27
To: Boipelo B. Ratshikana; Shannon S. Van Vuuren

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,

Subject:

Please find attached hereto a letter for your attention.





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: 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 From: Bolpelo B. Ratshikana <BolpeloR@commissionsc.org.za>
Sent: Friday, 15 November 2019 14:13
To: info@lugisanimantshaattorneys.co.za; dan@lugisanimantshaattorneys.co.za
Subject: Letter to Lugisani Mantsha Attorneys

Dear Sir/Madam

Please find attached letter for your attention and kindly acknowledge receipt.

Kind Regards,

Bolpelo Ratshikana
Executive Assistant to the Secretary
COMMISSION OF INQUIRY INTO STATE CAPTURE
Hillside House, 2rd Floor, 17 Empire Road, Parktown, Johannesburg, 2193
Tel: 010 214 0651 | Mobile: 071 319 7843 | Email: bolpelor@commissionsc.org.2





2^{rel} floor, Hillside House 17 Empire Road, Parktown Johannesburg 2193

Tel (International): +27 (10) 214-0651 Tel (Tollfnee): 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

To: Mr. D. Mantsha

15 November 2019

Lugisani Mantsha Attorneys

E-mail: Info@lugisanlmantshaattorneys.co.za dan@lugisanlmantshaattorneys.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.

- 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.
- 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.

- 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".
- 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

Madalata

Acting Secretary

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

STATE

to a particular affidavit that was given to her by General Booysen but that affidavit is not attached. And for those reasons we were of the view that you did not have all the information and would have asked — we were going to ask that you — this one be postponed. Yes thank you.

CHAIRPERSON: Okay so this one will be postponed.

ADV THANDI NORMAN SC: Yes.

<u>CHAIRPERSON</u>: And –and sometime not later than end of this week I would like to have it back.

ADV THANDI NORMAN SC: To deal with it.

10 CHAIRPERSON: Have it back so that one can look at the issues.

Maybe somebody in the legal team could.

ADV THANDI NORMAN SC: Yes.

CHAIRPERSON: Make short submissions on what should happen to it.

ADV THANDI NORMAN SC: We will go so Chair.

CHAIRPERSON: Ja.

ADV THANDI NORMAN SC: Thank you. Yes.

CHAIRPERSON: Ja.

ADV THANDI NORMAN SC: Thank you.

CHAIRPERSON: There is also an – an application by Ms Redi Tlhabi
for leave to give evidence and to cross-examine the former President
Mr Jacob Zuma.

ADV THANDI NORMAN SC: Chair just to ...

CHAIRPERSON: Yes.

ADV THANDI NORMAN SC: For the record I have just – the secretariat is seated behind me. That – that particular matter did not form part of

03 DECEMBER 2019 - DAY 195

the list of the matters that were furnished for decision today and for that reason I believe that she had notified the parties – yes.

CHAIRPERSON: Yes, no, no, no, that is fine. I am aware it was not — I am not going to give an outcome but I want to issue directions.

ADV THANDI NORMAN SC: Yes. Thank you Chair,

CHAIRPERSON: In this matter the former President did not file any affidavit to oppose the application but simply filed a notice to oppose. I do not see it here but I think I have seen – seen it. The directions I am going to issue are as follows:

10 ADV THANDI NORMAN SC: Yes Chair.

CHAIRPERSON:

- 1. If the former President Mr Jacob Zuma has anything to say in opposition to Ms Redi Tlhabi's application for leave go give evidence and to cross-examine him he must deliver written submissions on or before Monday the 9th December and thereafter I will deal with the matter in a manner that I will decide after seeing whether he has filed written submissions and depending on the contents of the submissions. So I think I am going to rephrase the direction so that...
- 20 ADV THANDI NORMAN SC: Yes Chair it is clear.

CHAIRPERSON: Okay.

ADV THANDI NORMAN SC: Yes Chair.

CHAIRPERSON:

 If the former President Mr Jacob Zuma wishes to say anything in opposition to Ms Redi Tlhabi's application for leave to give

03 DECEMBER 2019 - DAY 195

evidence and to cross-examine him he must deliver written submissions to the secretary on or before Monday 9 December 2019.

- 2. Once or rather if no written submissions are delivered to the acting secretary of the commission on or before Monday the 9th, 2019 the Chairperson will deal with the application in the manner he will deem appropriate including making a decision thereon.
- 3. If the former President Mr Jacob Zuma does deliver within the timeframe indicated written submissions in opposition of Ms Tihabi's application the Chairperson will take account of the written submissions and either announce the outcome thereof as soon as possible thereafter or invite Mr Tihabi if necessary to respond to those written submissions in which case the matter will be decided at a later date.

ADV THAND! NORMAN SC: As Chair pleases.

CHAIRPERSON: Thank you.

10

ADV THANDI NORMAN SC: Yes thank you Chair.

CHAIRPERSON: I would like you to make sure that the directions in regard to this matter of Ms Redi Tlhabi.

20 ADV THANDI NORMAN SC: Yes.

CHAIRPERSON: Are sent out today.

ADV THANDI NORMAN SC: Yes Chair we will...

CHAIRPERSON: Because - ja - ja.

ADV THANDI NORMAN SC: May we just approach you around teatime?

CHAIRPERSON: Yes.

03 DECEMBER 2019 - DAY 195

ADV THANDI NORMAN SC: So that Chair would have [indistinct].

CHAIRPERSON: That is - that is fine.

ADV THANDI NORMAN SC: Thank you Chair.

CHAIRPERSON: That is fine.

ADV THANDI NORMAN SC: Yes thank you. Chair may I then ...

CHAIRPERSON: Ja.

ADV THANDI NORMAN SC: If that is the end of the applications may we then be excused and ...

CHAIRPERSON: Yes, no before that I think I must just say.

10 ADV THANDI NORMAN SC: Yes.

CHAIRPERSON: That with regard to applications for leave to cross-examine I just want to say because there will be representatives of parties who are in – in the hearing or there may be others watching or listening that it is possible that in all of them or in some of them I may direct that the implicated person who has applied for leave to cross-examine.

ADV THANDI NORMAN SC: Yes.

CHAIRPERSON: A witness should give evidence first.

ADV THANDI NORMAN SC: Yes.

20 <u>CHAIRPERSON</u>: And subject himself or herself to questioning by the commission's legal team before embarking on cross-examination.

ADV THANDI NORMAN SC: Yes.

CHAIRPERSON: And if anyone of the persons who have been granted leave to cross-examine today has any objection or difficulty with such a procedure they must indicate that they have such an objection by no

Read: 2019/12/04 12:44

Shannon S. Van Vuuren

From: Shannon S. Van Vuuren

Sent: Tuesday, 03 December 2019 16:54

To: 'dario.milo@webberwentzel.com'; Lavanya Pillay

Cc: Andre J. Lamprecht; Warren Redcliffe; Boipelo B. Ratshikana

Subject: PRIORITY: SEQ 39/2019 // APPLICATION // R TLHABI // J ZUMA // ZONDO

COMMISSION

Attachments: Directions Zuma-Tlhabi 3 Dec 2019.pdf

Tracking: Recipient Delivery Read

'dario.milo@webberwentzel.com'

Lavanya Pillay

Andre J. Lamprecht Delivered: 2019/12/03 16:54

Warren Redcliffe Delivered: 2019/12/03 16:54

Boipelo B. Ratshikana Delivered: 2019/12/03 16:54 Read: 2019/12/04 08:42

Dear Sirs

We refer to the abovementioned matter.

Please find the attached correspondence marked for your attention.

Kindly acknowledge receipt hereof.

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 | lwww.sastatecapture.org.za



From:

Shannon S. Van Vuuren

Sent:

Tuesday, 03 December 2019 16:51

To:

'info@lugisanimantshaattorneys.co.za'; 'dan@lugisanimantshaattorneys.co.za'

Cc: Subject: Andre J. Lamprecht; Warren Redcliffe; Boipelo B. Ratshikana PRIORITY: SEQ 39/2019 // APPLICATION // R TLHABI // J ZUMA // ZONDO

COMMISSION

Attachments:

Directions Zuma-Tlhabi 3 Dec 2019.pdf

Tracking:

Recipient

Delivery

Read

'info@lugisanimantshaattomeys.co

'dan@lugisanimantshaattorneys.cr

Andre J. Lamprecht

Delivered: 2019/12/03 16:51

Read: 2019/12/04 08:48

Warren Redcliffe

Delivered: 2019/12/03 16:51

Boipelo B. Ratshikana

Delivered: 2019/12/03 16:51

Read: 2019/12/04 08:42

Dear Sirs

We refer to the abovementioned matter.

Please find the attached correspondence marked for your urgent attention.

Kindly acknowledge receipt hereof.

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 | lwww.sastatecapture.org.za





2nd floor. Hillside House 17 Empire Road, Parktown Johannesburg 2193

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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

3 December 2019

To: Lugisani Mantsha Attorneys (Attention: Mr. Dan Mantsha)

E-mail: info@lugisanimantshaattomeys.co.za

And to: Webber Wentzel (Attention: Dario Milo / Lavanya Pillay)

E-mail: (avanya.pillay@webberwentzet.com

Dear Sirs

RE: CHAIRPERSON'S DIRECTIONS: SEQ 39/2019 RULE 3.4 APPLICATION // REDIHENTSE TLHABI // FORMER PRESIDENT JACOB ZUMA

- 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 Tihabi'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 Tihabi's application, the Chairperson will take into account the written submissions and either announce the

Page 1 (Total Pages 2)

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



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 MANISHA AFTORNEYS

⊕ ₩₩

This artest and any fise transmitted with 4 are confidence and intended socially for the use of the advisors or entity to when they are audinosted. If you have scentred that email in error please mothy the system manages. This inestage contains confidence information and is intended only for the audin dual named if you are not the named addresses you should not described, discribible or only this in-mid. Please not by the sender immediately by a man'il you have received this a mid-by midule and delete the a mad from your system. If you are not the interned discribed the contents of this information is strictly prohibited.



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

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

- 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.
- 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.

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



From: Shannon S. Van Vuuren

Sent: Wednesday, 04 December 2019 12:46

To: 'dario.milo@webberwentzel.com'; 'Lavanya Pillay'

Cc: Andre J. Lamprecht; Warren Redcliffe; Boipelo B. Ratshikana

Subject: RE: PRIORITY: SEQ 39/2019 // APPLICATION // R TLHABI // J ZUMA // ZONDO

COMMISSION

Attachments: CHAIRPERSON'S DIRECTIONS: SEQ 39/2019 RULE 3.4 APPLICATION // REDIHENTSE

TLHABI // FORMER PRESIDENT JACOB ZUMA

Tracking: Recipient Delivery Read

'dario.milo@webberwentzel.com'

'Lavanya Pillay'

Andre J. Lamprecht Delivered: 2019/12/04 12:44 Read: 2019/12/04 21:13

Warren Redcliffe Delivered: 2019/12/04 12:44

Boipelo B. Ratshikana Delivered: 2019/12/04 12:44 Read: 2019/12/04 13.56

Dear Sirs

We refer to the abovementioned matter and our correspondence below.

Please find the attached correspondence received from Lugisani Mantsha Attorneys.

The Commission requests your comments thereto as soon as possible.

Feel free to contact me regarding this matter.

Thank you & kind regards,

Shannon Van Vuuren

Legal Advisor: Operations & Investigative Support

072 828 4576

COMMISSION OF INQUIRY INTO STATE CAPTURE

Hillside House, 17 Empire Road, Parktown, Johannesburg, 2193 [Gauteng | South Africa]

Email: shannonv@commissionsc.org.za | lwww.sastatecapture.org.za



From: Shannon S. Van Vuuren

Sent: Tuesday, 03 December 2019 16:54

To: 'dario.milo@webberwentzel.com' <dario.milo@webberwentzel.com>; Lavanya Pillay

<Lavanya.Piliay@webberwentzel.com>

Cc: Andre J. Lamprecht <andrel@commissionsc.org.za>; Warren Redcliffe <WarrenR@commissionsc.org.za>;

Bolpelo B. Ratshikana < BoipeloR@commissionsc.org.za>

Subject: PRIORITY: SEQ 39/2019 // APPLICATION // R TLHABI // J ZUMA // ZONDO COMMISSION

From: Lavanya Pillay <Lavanya.Pillay@webberwentzel.com>

Sent: Thursday, 12 December 2019 18:46

To: Shannon S. Van Vuuren

Cc: Andre J. Lamprecht; Warren Redcliffe; Boipelo B. Ratshikana; Dario Milo; Kuhle

Mavuso

Subject: RE: PRIORITY: SEQ 39/2019 // APPLICATION // R TLHABI // J ZUMA // ZONDO

COMMISSION

Dear Madam

Thank you for providing us with the correspondence from Mr Mantsha, which we have noted.

As there is no certainty as to when Mr Zuma will be in a position to provide his attorneys with instructions on our client's application, our client would prefer that the matter not be unduly delayed given the serious allegations made against her.

Kind regards

Lavanya Pillay | Associate

T: +27115305078 | M: +27737729947 | lavanya.pillay@webberwentzel.com | www.webberwentzel.com

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From: Shannon S. Van Vuuren [mailto:ShannonV@commissionsc.org.za]

Sent: 04 December 2019 12:44 To: Dario Milo; Lavanya Pillay

'Cc: Andre J. Lamprecht; Warren Redcliffe; Boipelo B. Ratshikana

Subject: RE: PRIORITY: SEQ 39/2019 // APPLICATION // R TLHABI // J ZUMA // ZONDO COMMISSION

Dear Sirs

We refer to the abovementioned matter and our correspondence below.

Please find the attached correspondence received from Lugisani Mantsha Attorneys.

The Commission requests your comments thereto as soon as possible.

Feel free to contact me regarding this matter.

Thank you & kind regards,

Shannon Van Vuuren

Legal Advisor: Operations & Investigative Support

072 828 4576

COMMISSION OF INQUIRY INTO STATE CAPTURE

From:

Boipelo B. Ratshikana

Sent:

Friday, 13 December 2019 16:59

To:

info@lugisanimantshaattorneys.co.za; dan@lugisanimantshaattorneys.co.za

Subject:

Letter to Lugisani Mantsha Attorneys

Attachments:

Scan_20191213_165418.pdf

Dear Sir/Madam

Please find the 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, 2rd Floor, 17 Empire Road, Parktown, Johannesburg, 2193

Tel: 010 214 0651 | Mobile: 071 319 7843 | Email: bolpefor@commissionsc.org.za | www.sastatecapture.org.za





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

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

- 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

Acting Secretary

Warren Redcliffe

From: Warren Redcliffe

Sent: Tuesday, 17 December 2019 11:05 To: dan@lugisanimantshaattomeys.co.za

'Dayna Arnoldi'; Sabina Lech; Shannon S. Van Vuuren; Samukelisiwe Jali; Boipelo B. Cc:

Ratshikana

Judicial Commission of Inquiry into Allegations of State Capture // Former President Subject:

Mr. JG Zuma

Attachments: Letter to DM V2 17 Dec 2019.pdf

Tracking: Recipient Delivery

'Dayna Arnoldi'

dan@lugisanimantshaattomeys.co.za

Sabina Lech Shannon S. Van Vuuren

Delivered: 2019/12/17 11:03 Delivered: 2019/12/17 11:03 Samukelisiwe Jall Delivered: 2019/12/17 11:03 Bolpelo B. Ratshikana Delivered: 2019/12/17 11:03

Dear Sir.

Please ignore the previous e-mail which contained an error and has thus been recalled.

STA

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 | lwww.sastatecapture.org.za



259



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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

17 December 2019

Lugisani Mantsha Attorneys

First Floor

Burnside Island, Block 6

410 Jan Smuts Avenue

Craighall, Johannesburg

Email:

info@lugisanimantshaattomeys.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 Chalrperson 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)
- 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 "03" 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.
- 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."

- 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.
- 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 falled 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.
- Please regard the contents of this letter, and in particular paragraph 6.1 above, as due notice of the contemplated application.

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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



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 Pediar 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.
- 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.
- 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

Commission.

On behalf of the chairperson of the Commission.

From: Angeline Coetzee <Angeline@presidency.gov.za>

Sent: Wednesday, 24 April 2019 16:08 **To:** info@lugisanimantshaattorneys.co.za

Cc: Geofrey Mphaphuli; Sello Mabelane; Nokukhanya Cele
Subject: Diary of the former President of RSA, Mr Jacob Zuma

Attachments: SKM_C654e19042415530.pdf

Good day,

Please find attached hereto the abovementioned record as per your request.

Trusting you find it in order.

Kind Regards

Angeline Coetzee on behalf of Mr Geofrey Mphaphuli

Legal & Executive Services

The Presidency Tel: +27 12 300 5405 Fax: +27 86 683 5405

Fax: +27 12 300 5780

E-mail: Angeline@presidency.gov.za
Website: www.thepresidency.gov.za





E-mail Disclaimer: http://www.thepresidency.gov.za/pebble.asp?relid=97

Email Disclaimer: http://www.thepresidency.gov.za/pebble.asp?relid=97

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

DRAFT STATEMENT

I, the undersigned

CASSIUS REGINALD LUBISI

THE PRESIDENCY
REPUBLIC OF SOUTH AFRICA

2019 -04- 2 3 DECLASSIFIED

SIGNATURE

SECRETARY OF THE CABINET

do hereby state under oath as follows:

- I am the Director-General and Secretary to Cabinet in the office of the President of the Republic of South Africa. By virtue of my position, I am duly authorized to depose to this statement.
- Unless the context indicates otherwise, the facts deposed to in this statement are within my personal knowledge and are to the best of my belief both true and correct.
- 3. The Presidency received a letter dated 14 November 2018 from the Secretary of the Commission requesting the Presidency to make available to the Commission "all public and private diaries, schedules, task managers, journals, daily records, records of events, notebooks, chronicle, daybooks, appointment books, engagement books, in electronic format, hard copy or otherwise, of the former President of the Republic of South Africa, JG ZUMA for the period between July and December 2010". The letter further advised that the Commission urgently

general Alexandr

2

requires access to the said information in either hard copy or electronic format in the form of a draft witness statement with attachments thereto.

- 4. Upon receipt of the letter, I requested the Private Office of the President to search and compile the requested information. The Private Office of the President is responsible for the coordination of the President's day to day activities and for the safe keeping of the relevant records in this regard.
- 5. The Private Office of the President made all reasonable efforts to conduct a search for the requested information. Pursuant to that search, I hereby make available to the Commission all records discovered. The discovered documents are attached herewith as annexure A.
- 6. I am satisfied with the search conducted and I confirm that all relevant information currently in the possession of the Presidency have been made available to the Commission.

DEPONENT

THUS, SIGNED AND SWORN TO BEFORE ME AT CARE TOWN ON THIS THE CAPT DAY OF MOVEMBER 2018, THE DEPONENT HAVING ACKNOWLEDGED THAT THE DEPONENT KNOWS AND UNDERSTANDS THE CONTENTS OF THIS STATEMENT, THAT IT IS BOTH TRUE AND CORRECT TO THE BEST OF THE DEPONENT'S KNOWLEDGE AND BELIEF, THAT THE DEPONENT HAS NO OBJECTION TO TAKING THE PRESCRIBED OATH AND THAT THE PRESCRIBED OATH WILL BE BINDING ON THE DEPONENT'S CONSCIENCE.

COMMISSIONER OF OATHS

1 July 2010

10:00 AM - 11:00 AM Meeting with HFA President, Mr Sepp Bletter -- Mahlamba Mdlopfy

11:30 AM - 12:00 PM FIFA.com interview -- Mahlamba Ndlopfu

02:00 PM - 03:30 PM Blocked for meeting with National Religious Loaders Forum. In attendance: Ministers Chahane; Molewa; DG Mavimbela; Dra Siswana & Ngqulunga — Maldembe Nelledpu

64-00 PM - 65-30 PM Meeting with the Independent Commission on the Removeration of Public Office Bearers -

Mehlemba Ndionfu

2 July 2010

All Day Quarter Finals: 57. Netherlands vs Brazil in Fort Blissbeth at 16:00; 58. Usuguay vs Ghasa in

Johannesburg, Soccar City at 20:30

99:45 AM - 09:00 AM Depart Mahlamba Nellepfu for Union Buildings

09:00 AM - 20:00 AM Meeting with Agri SA (ref Lakels/ Alan Hirsch) -- President's Beautroom; Union Building

10:30 AM - 11:00 AM Depart Union Buildings for Waterldoof AFB

11:00 AM - 01:00 PM Depart Wateridoof AFB for Cape Town International Airport

01:30 PM - 92:00 PM Depart for Hamilton Rugby Club

02:00 PM - 05:00 PM Attend the practice session for the Special Olympics Unity Cop soccer match: Lydia Name

0824118641 -- Hamilton Rugby Club: Cape Toren

05:00 PM - 06:00 PM Depart Studium for Genedendaal

07:00 PM - 07:30 PM Depart Genedandeal for the Castle of Goodhope

07:30 PM - 10:00 PM Reception Dinner. (Ref: Debuy) -- Cape Town

2019 -04-2 3

THE PRESIDENCY REPUBLIC OF SOUTH AFRICA

DECRETARY OF THE CABINET

3 July 2010

Quarter Finsis: 59. Argentina vs Germany in Cape Town at 16:00; 60. Paraguay vs Spain is Johannesburg, Ellis Park at 20:30 All Day

11:00 AM - 11:30 AM Possible courtesy call by the Federal Chancellor of Germany, Dr Angela Mesical (TBC) Contact at

DTRCO: Mr & Koessler 0824497515 -- Genedendal

01:00 PM - 84:00 PM Special Olympics Celebrity Football Match, More details to follow

2018/11/20 12:19 PM

President Diary (TOP SECRET)

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84:00 PM - 06:30 PM

FIFA 2010 Quarter Final Argentina us Germany -- Cape Town Stadium

4 July 2010

MA 05:90 - MA 60:90

Depart Genadendaal for Cape Town Airport

09:30 AM - 11:30 AM

Depart Cape Town Airport for Wateridoof Airforce Base

11:30 AM - 12:00 PM

Depart Wateridoof Airforce Base for Alexandra Township

12:00 PM - 02:30 PM

Opening caremony of the Football for Hope Festival 2010 (Rof Lakels) Contact: Ms Fundi Sithebe at 063 2010 220 — No. 3 Square, Thirteen Avenue, Alexandra

02:30 PM - 03:00 PM

Depart Alexandra for Mahlambe Ndlegfu

04:00 PM - 05:00 PM

Blocked raf &#Rica

5 July 2010

All Day

Note: TBC Launch of houses in Sweetwaters. More information to follow (Ref Labels / Zin)

10:30 AM - 06:30 PM

Officials/NVIC

6 July 2010

09:39 AM - 10:05 AM

Depart Meklamin Nationfu for Waterkloof AFB

10:00 AM - 12:00 PM

Depart Waterkloof AFB for Cape Town International Airp

12:00 PM - 12:30 PM

Depart Cape Town International for Foreshore

OL:00 PM - 03:00 PM

Global Fund Manager's Lunch (Ref Deisey)contact Caron Ranger on caron.ranger@investocmail.com or +44 78 244 52831; Nobuthendo :084 577 8778 — Investoc Asset Management, 36 Hams Strijdom

Avenue, Formhore, Cape Town

03:00 PM - 03:30 PM

Depart Foreshore for Genedendal

03:30 PM - 05:00 PM

Block

Q5:00 PM - 06:00 PM

Meeting with Dr Henry Kissinger. Contact Saichile Ngcebo on 082 896 1394

07:30 PM - 08:00 PM

Depart Genadendal for Cape Town Stadium

President Diary (TOP SECRET)

2018/11/20 12:19 PM

PLACE MI

THE PRESIDENCY REPUBLIC OF SOUTH AFRICA

09:30 PM - 11:00 PM

Semi-Finals: 61. Netherlands 58 vs tirugusy in Cape Town et 20:30

7 July 2010

89:30 AM - 10:00 AM

Depart Genedendal for Cope Town International Airport

30:08 AM - 12:00 PM

Depart Cape Town International Airport for King Shaka International Airport

12:00 PM - 12:38 PM

Depart King Shaka International Airport for Kings House

12:30 PM - 03:30 PM

03:30 PM - 04:00 PM

Depart Hings House for Durban Habour

04:00 PM - 06:00 PM

Pre-match cocktails. Contact See on 074 166 1839(Ref Lakels) — N-shed passenger Terminal, Durbae

06:00 PM - 06:30 PM

Depart Durban harbour for Kings House

07:30 PM - 08:00 PM

Depart Kings Flows for Moses Mabisida Stadium

G8:30 PM - 11:00 PM

Somi-Finals: 62, Germany vs. Spain in Durban at 20:30

8 July 2010

08:00 AM - 08:30 AM

Depart Kings House for King Shaka International Airport

08:30 AM - 09:30 AM

Depart King Shalts Airport for Waterideof AFB

09:30 AM - 10:00 AM

Depart Water Kloof for GM

10:00 AM - 04:00 PM

04:30 PM - 05:00 PM

Depart GM for Mahlamba Ndiopite

95:00 PM - 05:30 PM

Meeting with SOE

05:30 PM - 06:00 PM

Recording of Thank you message by LOC and GCIS

9 July 2010

MA 08:80 - MA 90:80

Depart Mahlamba Ndloptu for the Union Suitdings

3

President Diary (TOP SECRET)

Am Ve

2018/11/20 12:19 PM

THE PRESIDENCY

09:00 AM - 12:00 PM	Incoming State Visit by Brazil President. HE Luiz Inacio Leia da Silva Union Buildings	
12:00 PM - 01:00 PM	Vielt to Freedom Park	
02:00 PM - 01:30 PM	Depart Freedom Perk for mehlamba Mdiefu	THE PRESIDENCY REPUBLIC OF SOUTH AFRICA
02:30 PM - 03:30 PM	Depart Mahlamba Ndlopfu for Sandton	2019 -04- 2 3
03:30 PM ~ 05:00 PM	Business Forum Sandton Convention Centre	DECLASSIFIED
05:00 PM - 05:30 PM	Depart Sancton for Maklambandlopfu	SECRETARY OF THE CABINE
07:00 PM - 07:36 PM	Depart Mahlamba Millopfu for the Presidential Guest	
07:30 PM - 08:30 PM	State banquet in honour of the President of Brazil, HE Luiz Inacio Luita da Silva. — Presidential Guest House	
C\$:30 PM ~ 09:00 PM	Depart Presidential Guesthouse for the Coca Cole Dome	
09:00 PM - 11:00 PM	FIFA 2010 PWC Closing Concert: — Coca Cola Dome	
10 July 2010		73
09:00 AM - 11:00 AM	Courtesy call by Mrs. Chande Kockher, MD&CEO of KIC Mehta - Chief Representative Offices; Tel: +27 11 676 78 Ndlopfu	i Bank Limited (Ref Lakela), Cotact Sushant 01; Celk+27 83 4771819 — Mahlamba
11:00 AM - 12:00 PM	Mosting with Dr Jacques Rogge, President of Internation	nal Olympic Committee (IOC)
02:00 PM - 02:30 PM	Working lunch with Presidents. More information to follow (Ref Milks / Debey) Mahlamba Ndlopfu	
03:00 PM - 03:30 PM	Blocked Ref Monhlanhla	16
04:00 PM - 04:30 PM	Blocked for Lindi Zulu Briefing on One Goal Education Summit	
05:00 PM - 05:30 PM	Depart Mahlamba Hdiopfu Sor Wateridoof AF8	
85:30 PM - 07:30 PM	Depart Waterkloof AFB for Port Ekzabeth Airport	
07:30 PM - 08:00 PM	Depart Port Elizabeth Airport for the stadium	
68:30 PM - 10:30 PM	2010 FIFA World Cup Losers between Uruguay and Germany Port Elizabeth	

President Diary (TOP SECRET)

2018/11/20 12:19 PM

10:30 PM - 12:30 PM

Depart Port Elizabeth Airport for Waterklusf AFB

11:30 PM - 32:00 AM

Depart Waterkloof AFB for Mahlambe Ridiopfu

11 July 2010

08:00 AM - 08:30 AM

10:00 AM - 12:30 PM

Deport Mahlamba Ndlopfu for the Presidential Guest House

02:00 PM - 01:30 PM

12:30 PM - 01:00 PM

Maeting with Prime Minister Balkenende, Prime Minister of the Netherlands — Presidential Guest

Block

02:00 PM - 04:00 PM

One Goal Education Summit and African Heads of State Luncheon -- Presidential Guest House

DUOG PM - 04:30 PM

Depart the Presidential Guest House for Socor City

05:00 PM - 10:30 PM

Blocked for closing caremony and final match between Holland and Spain of the 2010 FFFA World Cup -- Sorger City

12 July 2010

97:00 AM - 97:30 AM

End of Schools holiday

09:00 AM - 02:00 PM

Officials/NWC

02:30 PM - 03:30 PM

2010 FIFA World Cup Closing Press Conference : Zanele Mingadi -- Sandton

06:00 PM - 07:30 PM

Blocked Ref Nonhlanhia -- Mahlemba Ndiopfu

13 July 2010

All Day

08:36 AM - 12:30 PM

Cabinet Committee -- Union Buildir

03:00 PM - 02:00 PM

Meeting with Mr Mphablus

02:00 PM - 05:00 PM

Provisionally blocked for meeting with Captains of Industry (Ref:Delsey) -- Room 159

Alica

2018/11/20 12:19 PM

THE PRESIDENCY

President Diary (TOP SECRET)

5

05:00 PM - 05:00 PM SACU consultation. In attendance Ministers of DIRCO, Treesury & the DTL - President's office

06:00 PM - 06:30 PM Courtesy meeting with the Inspector General of Intelligence. Contact Adv FD Radebe on 082 337

9233 (Ref: Delsey) -- Mahlembandlopfu

Q7:00 PM - Q7:30 PM Depart Mahlamba Nellopfu for Hatfield

08:00 PM - 09:00 PM Special broadcast. Contact Zanele on 062 330 1148. (Ref: Vincent) -- Hatfield

09:00 PM - 09:30 PM Depart Hatfield for Mahlamba Hdlopfu

14 July 2010

08:00 AM - 08:30 AM Depart Mahlamba Nellopfu for the Union Buildings

08:30 AM - 12:00 PM Cabinet Committee -- Union Buildings

12:00 PM - 12:30 PM Mosting with Minister of Rural Development. (Ref: lokele)

01:00 PMF - 03:00 PM Presentation and discussion on growth path. (Ref Lakela) Contact: Minister Patel's office President's Boundroom, Union Suildings

03:00 PM - 08:30 PM Depart Union Buildings for Mahlamba Midlepfu

03:39 PM - 07:09 PM Block

07:00 PM - 10:00 PM Olimer morting with Blanagement of SANDF. Contact Charlot on 022 414 5514, (Ref. Lakels) --

Mehlambandlogfu

15 July 2010

07:00 AM - 07:30 AM Depart Mahiamba Ndlopiu for Waterkloof

07:30 AM - 08:30 AM Depart Wateridoof for Harare, Zimbabwe

09:00 AM - 03:30 PM Blocked for Zimbabwe

03:30 PM - 05:00 PM Deport Hazare for Wateridoof AFB

05:00 PM - 05:30 PM Depart Waterkloof for Mahlamba Mdlopfu

05:30 PM - 07:00 PM Block

Rider My

2018/11/20 12:19 PM

THE PRESIDENCY REPUBLIC OF SOUTH AFRICA

SECRETARY OF THE CABINET

JGZ-PROC01/2020-APP-175

GEN-CORRESPONDENCE-028

15 July 2010 Continued

07:00 PM - 09:00 PM Dinner with four Heads of State attending the SACU Sununit -- Mahlamba Ndlopfu

16 July 2010

09:00 AM - 02:00 PM Southern African Customs Union (SACU) Heads Summit (Ref Lakela) Contact at SADC Desic Goolem

Asmal at 0845032004 / asmalg@dirco.gov.za — Precidential Guest House

92:00 PM - 02:30 PM Bilateral with President Poissniba of Namibia

TBC Possible briefing on Madagascar by former President Chissano (Ref Wellie Nhiapo) — Presidential Quest House 02:30 PM - 03:30 PM

03:30 PM - 04:35 PM Depart Waterloof AFS for King Shaka International Airport

17 July 2010

07:30 AM - 09:00 AM

Block, (Ref: Dr Adams)

09:30 AM - 20:00 AM Depart Kings House for Eshowa

10:00 AM - 11:00 AM Stock: - Eshows

11:00 AM - 11:30 AM Depart Eshows for Enturneni

12:00 PM - 09:30 PM Styalima meeting of Attakhool in IZM: contact Manhe: 076 747 5889 -- Inkantolo yeNkosi Enturnell

(Mandle)

05-30 PM - 06-00 PM Depart Nitendia for Kings House

18 July 2010

08:00 AM - 08:30 AM Depart Kings House for King Shaka International Airport

08:30 AM - 09:30 AM Depart King Sheka International Airport for Umtata

09:30 AM - 03:00 PM Mandela Day Calabrations. Contact Jamo on 092 378 7859. (Ref: Lakala) -- Queu

02:30 PM - 02:30 PM Depart Umtata for King Shaka International Airport

03:00 PM - 04:30 PM Depart King Shaka International for Matiga Air Force Rase, Libya. 9 hours

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THE PRESIDENCY

REPUBLIC OF SOUTH AFRICA

SECRETARY OF THE CARRIED

2018/11/20 12:19 PM

President Diary (TOP SECRET)

JGZ-PROC01/2020-APP-176

GEN-CORRESPONDENCE-029

19 July 2010

09:30 AM - 05:00 PM

Blocked for visit to Libys

05:00 PM: - 06:00 PM:

Depart Libya for Waterldoof AFS 6 hours

20 July 2010

08:00 AM - 08:30 AM

Depart Mahlamba Ndiopfu for the Presidential Guest House

09:30 AM - 07:30 PM

Cabinet Lakgotia -- Presidential Guest House

21 July 2010

08:30 AM - 09:08 PM

Cabinet Lelegotia -- Presidential Guest House

22 July 2010

10:00 AM - 07:00 PM

ANC NEC -- Exsellen Park

23 July 2010

20:00 AM - 07:00 PM

ANC NEC -- Emelian Park

88:00 PM - 12:00 AM

Depart Waterkloof AFS for Uganda

24 July 2010

All Day

APRM Sumodt in Kampala, Uganda

10:00 AM - 07:00 PM

African Union Summit -- Uganda

25 July 2010

07:00 AM - 03:30 PM

Block

04:00 PM - 06:06 PM

AU Summit in Kampala, Uganda

26 July 2010

11:00 AM - 05:30 PM

AU Summit - Kampala, Uganda

NOR NO

2018/11/20 12:19 PM

THE PRESIDENCY REPUBLIC OF SOUTH AFRICA

SECRETARY OF THE CABINET

President Diary (TOP SECRET)

1

JGZ-PROC01/2020-APP-177

GEN-CORRESPONDENCE-030

THE PRESIDENCY REPUBLIC OF SOUTH AFRICA

SECRETARY OF THE CABINET

27 July 2010

68:00 AM - 01:00 PM AU Summit -- Kempala

06:30 PM - 32:00 AM Depart Kampala for Weterkloof AFB

28 July 2010

09:00 AM - 02:00 PM Blocked (Rel Delsey)

02:00 PM - 02:30 PM Meeting Ref: Delsey)

04:00 PM - 05:00 PM Interview Meeting TBC(Ref: Laketa/Delpey)

05:00 PM - 05:30 PM Meeting with Minister

06:00 PM - 07:00 PM Riceting with DP (Ref Lakela)

29 July 2010

10:30 AM - 22:00 AM Depart Mahlamba Ndiopfu for the Union Buildings

11:00 AM - 13:30 AM Meeting with Minister Shiceka and Contraless, Nikod Phatakile 083 441 9222

Media brieflag to announce the findings of the Nislapo Commission (Ref Lakels) in attendance: Minister Shiceke -- Media Centre, Union Buildings 12:00 PM - 12:30 PM

12:30 PM - 01:00 PM Interview with the information Telagraph Agency of Russia ITAR-TASS (Ref Zamie) - President's

Lounge

01:30 PM - 02:00 PM Depart the Union Buildings for Mahlamba Ndioplu

02:00 PM - 02:30 PM Meeting (Ref:Delsey)

03:30 PM - 04:30 PM Meeting with Minister Maniel and Mr Cyril Ramaphosa, Deputy Chairperson of the National Planning Commission (Ref Lakela) Contact: Patif Smith X 5275 — Maidamba Mdiopfu

06:00 PM - 06:30 PM Depart Mahlamba Nellopfu for Effis Park Stadium

07:00 PM - 09:00 PM South African Federation of Civil Engineering Contractors (SAFCEC), celebratory banquet: contact

person Lindelws Mystera 378 451 8154 - Elits park Stadium

30 July 2010

President Diary (TOP SECRET)

09:00 AM - 11:00 AM Depart Wateridani AFB for Cape Town International Airport

Assis P/

2018/11/20 12:19 PM

30 July 2010 Continued

Depart Cage Town International Airport for Sommerset Hotel 11:00 AM - 12:30 AM

12:00 PM - 02:00 PM National Farmworkers' Summit. Theme: Towards a better Rie for vulnerable workers in farms,

forestry & fisheries. Contect: Mr Mkhululi Maskazana, Tel: 0.22 319 6168; Cell: 082 889 9696 Pax: 012 319 6259 Email: DDGSSP@daff.gov.za -- Lord Charles Somerset Hotel, Somerset West

02:08 PM - 02:30 PM Depart Sommerset West for Genedendal

03:30 PM - 04:00 PM Depart Genadendal for Cape Town International Airport

Depart Cape Town International Airport for King Shaka International Airport 04:00 PM - 05:00 PM

31 July 2010

MA 05:50 - MA 00:80 Depart Kings House for Enyoni

68:30 AM - 10:30 AM Blocked: Private -- Enyoni

11:00 AM - 13:30 AM Depart ENyoni for Kings House

11:30 AM - 05:00 PM Vodacom Durham July. Contact 031 314 1639 — Greyville Recorpuse

> THE PRESIDENCY REPUBLIC OF SOUTH AFRICA

1 August 2010

08:00 AM - 12:30 AM

BLOCKED (Ref Lakela)

11:30 AM - 12:00 PM

Depart Kings House for King Shaka International Airport

12:00 PM - 01:00 PM

Depart King Shaka International Airport for Wateridge! AFB

01:00 PM - 01:30 PM

Depart Waterkloof AFB for Mahlemba Ndlopfu

02:00 PM - 02:30 PM

Meeting with Marion Sparg 082 499 0327 POSTPONED -- Mahlamba Nidlopfu

04:00 PM - 04:30 PM

Mosting with Deputy Minister Missisia

2 August 2010

09:30 AM - 10:00 AM

Depart Mahfamba Ndiophi for Luthuli House

10:00 AM - 05:00 PM

Officials/NWC

2019 -04-2 3

THE PRESIDENCY REPUBLIC OF SOUTH AFRICA

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SECRETATIVO, THE CARINE

3 August 2010

19:00 AM - 11:00 AM

Blocked (Ref Lateria)

13:30 AM - 12:30 PM

Briefing on Russia State visit (Ref Lakela) in attendance: DG's of DIRCO & the DTI -- Mablantha

12:30 PM - 01:00 PM

Meeting with Minister Sonjica

03:00 PM - 05:00 PM

Interview with Dr Ebrahim Harvey 082 553 2735(Ref Lebels) -- Meldamba Ndioptu

95:00 PM - 95:30 PM

Meeting with Deputy Minister van der Merwe

05:30 PM - 06:00 PM

Blocked for recording of Ramasdan message (Ref Zamile)

96:00 PM - 07:30 PM

Meeting with Acting Minister of PME Minister Patel -- Mahiamba Nellopius

4 August 2010

MA 06:80 - MA 00:80

Depart Mahlamba Ndiopfu

08:30 AM - 12:30 PM

Cabinet

Chair - President - Pretoria

02:00 PM - 12:00 AM

Depart Waterkloof AFB for Moscow International [11:30 hours]

President Diary (TOP SECRET)

2018/11/20 12:20 FM

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THE PRESIDENCY

A.NK V

REPLIELIC OF SOUTH AFRICA

5 Augus? 2010

12:00 AM - 01:00 AM Depart Wateridoof AFB for Moscow International[11:30 hours] Please See Above

07:30 AM - 01:00 PM State visit to Russia - Mescou

6 August 2010

09:00 AM - 04:00 PM State visit to Russia -- Moscow

07:00 PRI - 12:00 AM Depart Moscow International for Waterldoof AFR [11:25 hours]

7 August 2010

8 August 2010

12:00 AM - 06:00 AM Depart Moscour International for Wateridoof AFS (11:15 hours)

68:00 AM - 11:30 AM SLOCKED (Ref Lakela)

01:00 PM - 04:00 PM Sports meeting Ref Zizi Kodwa and Lakela Kaunda -- Mahlamba Pidlomfu

Depart WaterMoof AFE for Unitate Airport

04:00 PM - 06:00 PM Telicom Charity cup Finals (Ref. 2lzi) -- Soccer City

85A 00:00 - MA 00:30

09:00 AM - 09:30 AM Depart Unitate Airport for Ntabenjasiu (Helicopter)

09:30 AM - 04:00 PM InsvessialocZizi Kodwa 082 330 4910 and Nomonde Micones 082 551 9157 — Eastern Com-

04:00 PM - 04:30 PM Depart Nizbaniado for Umitata (Helicopter)

06:30 PM - 07:00 PM Overnight: Hislanathi Lodge, Umtata

9 August 2010

GB:30 AM - G9:00 AM Depart Umista for Ichtywe. Contact Direpho Majole on 082 702 9137

09:30 AM - 20:00 AM Depart Umtata airport for East London airport

11:00 AM - 02:00 PM Women's Day : Mirangiseni Ozhivoni -- Absa Stadium, East London, Bastern Cape

05:00 PM - 09:00 PM President's mobilisation programme:Zizi Kodwa 082 330 4910 and Homonde Micosana082 551 9157

-- Eastern Cape

President Diary (TOP SECRET) 2018/11/20 12:20 PM

GEN-CORRESPONDENCE-034

THE PRESIDENCY
REPUBLIC OF SOUTHAFRICA

2019 -04- 2 3

SECRETARY OF THE CABINET

9 August 2010 Continued

09:00 PM - 09:30 PM

Overnight: Hemingways, East London

10 August 2010

08:00 AM - 08:30 AM Depart East London for Sutterworth (Helicopter)

09:00 AM - 03:30 Pta President's Mobilisation Programme:Zizi Kodwa 062 330 4910 and Nomonde Missana082 551 9157

-- Eastern Cape

04:00 PM - 04:30 PM Depart Butterworth for East London Airport

04:30 PM - 05:30 PM Depart East London Airport for Port Elizabeth Airport

06:00 PM - 06:30 PM Overnight: Radisson Hotel, Port Elizabeth

11 August 2010

10:00 AM - 05:00 PM President's Mubilisation Programme: Ed Kodwe 082 320 4910 and Normande https://doi.org/10.157

- Eastern Cape

06:00 PM - 07:30 PM Depart Port Elizabeth for Waterkloof AFB

GS:00 PM - 09:30 PM Befana Bafana vs Ghona soccer metch (Ref Delsey) — National Stadlern

12 August 2010

CB:00 AM - CB:30 AM Depart Waterkloof AFE for Moshoushoe Esternational Airport

10:00 AM - 10:00 PM State Visit to Lesothe

13 August 2010

09:00 AM - 09:30 AM Depart by Helicopter from Moshoeshoe listernational Airport for Katse Dem

10:00 AM - 02:00 PM State visit to Lasotho - Visit to Ketse dam

02:00 PM - 02:30 PM Depart by Melicopter from Kasse dam for Moshoeshpe International Airport

06:00 PM - 07:00 PM Depart Moshoeshoe International Airport for Waterkloof AF6

07:00 PM - 07:30 PM Opport Waterkloof AFB for Mahlamba Ndlopfu

ARK VI

President Dlary (TOP SECRET)

2018/11/20 12:20 PM

3

07:30 PM - 08:30 PM

TBC Briefing meeting on G20 in Secut. In attendance: Messrs Nephrale & Appaleira - Mehlamba

Nidlopfu

08:30 PM - 09:30 PM

Sriefing by Zimbebwe facilitation team (ref Delgoy)

14 August 2010

08:30 AM - 09:00 GM

Depart Mehlamba Ndlopfu for Johnsnesburg

09:00 AM - 12:00 PM

ANC Presidential Golf Day (Ref: Nomonda) NII: President to waar graff attire & to bring golf clubs --

Royal Johannesburg & Kensington Golf Club, 1 Fairway Avenue, Linksfield North

12:00 PM - 12:30 PM

Depart Johannesburg Country Club for GM

12:30 PM - 01:30 PM

Błock

01:30 PM - 02:00 PM

Depart GM for Nariow World

02:00 PM - 04:00 PM

President's Youth award and passing of the batos from former President Mandels to President

Zuma, Note: Madibe will not be present, ref Zelde - Barlow World, Sandton

04:00 PM - 04:30 PM

Depart BArlow World for GM

06:30 PM - 09:00 PM

Friends of the President Golf Day Gala Dinner - Royal Johannesburg & Kensington Golf Club

09:00 PM - 09:30 PM

Depart Johannesburg Country Club for Mahlamba Nellophi

15 August 2010

06:30 AM - 07:00 AM

Dogert Mahlamba Ndlopfu for Waterkloof AFB

07:00 AM - 09:00 AM

Depart Waterkloof AFB for Hoses Kutsko International Airport, Windhoek, Namibia

10:00 AM - 05:00 PM

Summit Troiks of the Organ on Politics, Defence & Security Cooperation -- Windhook, Namibia

16 August 2010

08:30 AM - 10:30 PM

30th SADC Jubilee Summit -- Windhoek, Namible

17 August 2010

09:00 AM - 07:00 PM

30th SADC Jubilee Summit -- Windhoek, Namibia

THE PRESIDENCY REPUBLIC OF SOUTH AFRICA

> 2019 -04-2 3 DECLASSINED

SECRETARY OF THE CASINET

President Diary (TOP SECRET)

2018/11/20 12:20 PM

1.41.1

07:00 PM - 08:30 PM

Departure from Hoses Kutzko international Airport, Windhook for Cape Town International Airport

(exact time TBA&C)

18 August 2010

07:30 ARE - 03:00 AM

Depart Genadendal for Tuynhuys

08:30 AM - 01:00 PM

Cabinet Chair - President -- Case Town

01:00 PM - 01:30 PM

Greet imittees attending the Joint Sitting -- Protes Lounge at Good Hope Suilding

02:00 PM - 04:00 PM

Joint sitting in Cape Town to debate the successful hosting of the FUFA 2010 World Cup

04:00 PM - 04:30 PM

Meeting with Themba Mgotha Contact 079 877 3488

04:30 PM - 05:30 PM

Meating with Nor Negatula and Mr Mohabhwa to discuss handing over of Shorpe responsibilities (Ref.

Delsoy)

06:00 PM - 07:30 PM

Joint Standing Committee on Intelligence (Ref Lakela) -- Room 26

07:30 PM - 08:00 PM

Depart Tuynbuys for Genadendal

08:00 PM - 09:00 PM

Block: (Ref: Deisey)

19 August 2010

09:30 AM - 10:00 AM

Depart Groote Schour Estate for Overberg

10:00 AM - 05:00 PM

Imvuselelozza Kodure 082 330 4910 and Sibongile Mile on 082 343 3705 — Straisbaal & Houston,

Western Cape

95:00 PM - 08:30 PM

Depart Overberg for Groots Schusir Estate

06:00 PM - 07:00 PM

Meeting with DG Mavimbels - Genedendal

20 August 2010

08:00 AM - 09:00 AM

Depart Genedendel for Boland

09:00 AM - 03:30 PM

President's Mobilisation Programme:Zizi Kodwa 082 330 4919 and Sibereglie on 082 34 -- Franschook

& Paarl, Western Cape

3705

Q3:30 PM - Q4:30 PM

Depart Bojand for Genedendal

President Diary (TOP SECRET)

2018/11/20 12:20 PM

ASSA VI

THE PRESIDENCY REPUBLIC OF SOUTH AFRICA

5

05:00 PM - 05:30 PM Depart Genadendal for Cape Yown International Airport

GS:30 PM: - 07:30 PM Depart Cope Town International Airport for King Shake International Airport

97:30 PM - 05:00 PM Depart King Shaka International Airport for Kings House

21 August 2010

08:30 AM - 09:00 AM Depart Kings House for for Nigitanyori (Chopper) Grids #30deg 04.659 #030deg 32,706

09:30 AM - 03:00 PM Reburks of Mr Jerry Kuzwayo... Contact Nell Gumedo 882 063 1882 -- Mbumbulu, Kwa Zukr Netal

03:00 PM - 03:30 PM Depart Mgillamyoni for King Shake International Airport (Chapper)

03:30 PM - 05:30 PM Depart King Shaka International for Cape Town International Airport

05:30 PM - 06:00 PM Depart Cape Yourn International for Genadendal

96:30 PM - 97:00 PM TBC Meeting with Mr Pallo Jordon 052 99001A3 (Ref NEBra/ Nochianhla) - Ganadendal

22 August 2010

99:00 AM - 12:30 PM ANC Imvuselelo campaign :Zizi Kochra 092 330 4910 and Sibongile Mila on 062 343 5705 — Mitcheli's Plain, Western Cape

12:30 PM - 01:00 PM Depart Strandfontein for Cape Town International Airport

01:00 PM - 02:00 PM Depart Cape Town International for WaterIdoof AFS

03:00 PM - 03:30 PM Depart Wateridoof AFS for Mahlesuba Ndjopfy

05:30 PM - 07:00 PM Depart Mahiamba Ndiopfu for Waterbloof AFB

07:00 PM - 12:00 AM Depart Waterkloof AFB for Beijing, China (Refuelling & change of crew in Mumbal, India, Flight

duration ±15hrs) (Ref Delsey)

23 August 2010

12:00 AM - 10:00 AM Depart Waterkloof AFR for Beijing, China (Refuelling & change of crew in Mumbel, India, Flight

duration ±15hrs) (Ref Delsey)

Please See Above

01:30 AM - 02:00 AM Officials/NWC

2018/11/20 12:20 PM

THE PRESIDENCY

REPUBLIC OF SOUTH AFRICA

2019 -04-2 3

SECRETARY OF THE CABINET

President Diary (TOP SECRET)

10:00 AM - 06:00 PM

Blocked

24 August 2010

12:30 AM - 01:30 AM Cobinet Committee: Governance and Administration (GA) Chair - Dep. President (An applicage to

be sent] -- Cape Town

Cabinet Committee: Social Protection, Community and Human Development(SPCHD) Chair - President [An apology to be sent] -- Cape Town 01:30 AM - 02:00 AM

08:00 AM - 05:00 PM Blocked for China State visit

25 August 2010

12-30 AM - 01:30 AM Cabinut Committee: Economic Sector, Employment and Infrastructure Developement (ESED)

Only - President (An applogy to be sent) -- Cape Town

00:30 AM - 02:30 AM Cabinet Committee: International Cooperation, Trade and Security (2CTS)

¡An apology to be sent] - Cape Town

08:00 AM - 05:00 PM **Blocked for China State wisit**

07:00 PM - 09:00 PM Depart for Hongqiao International airport in Stanglai

26 August 2010

09:30 AM - 03:00 PM Blocked for Shanghal Expo & Chine-SA Business Forum -- Shanghai

08:00 PM - 12:90 AM Depart Chine to Waterkloof AFB , ETA is 04h30 local time

27 August 2010

28 August 2010

MA 0E:40 - MA 00:51 art China to Waterkloof AFE , ETA is 04h30 local time Please See Above

08:00 AM - 10:30 PM BLOCKED

07:00 AM - 07:30 AM Depart Mahismke Ndlopfu for Waterldoof AFB

07:30 AM - 09:30 AM Depart Waterkloof AFS for Cape Yown International Airport

2018/11/20 12:20 PM

had VI

THE PRESIDENCY

REPUBLIC OF SOUTH AFRICA

2019 -04-2 3

President Diary (TOP SECRET)

Depart Cape Town International Airport for St Georges Cathedral - Cape Town 09:30 AM - 10:00 AM

10:00 AM - 01:00 PM Attend the funeral of Mr Joe Matthews -- St George's Cathedral, Cape Town

01:30 PM - 02:00 PM Depart to Cape Town International Airport

Depart Cape Town International Airport for Wateridoof AFB 02:00 PM - 04:30 PM

04:30 PM - 05:00 PM Depart Waterkioof AFS for Mahlamba Ndiopfu

29 August 2010

20:00 AM - 08:00 PM

30 August 2010

09:00 AM - 09:30 AM Depart Mahlamba Millopfu for NASREC

09:30 AM - 10:30 AM Address The India Show, Contacts at the DTI: PNcapay@thecht.gov.na)call: 682 939 7293 / Riaan M Roun 092 132 1750 (RieRoun@thedti.gov.m) or Vikrom Dorsiswami ,Consul General of India, Tek +27 11 482 8491 / 079037:1112 — Hall 10, NASREC

10:30 AM - 11:00 AM Depart NASREC for Lexical House

11:00 AM - 06:30 PM Liztheli House: Officials & / or NWC

06:30 PM - 07:00 PM Dupert Mahlesuba Nollopfu for Waterkloof AFB

07:00 PM - 08:30 PM Depart Wateridgof AFS for Cape Town International

88:30 PM - 09:00 PM Depart Cape Town International Airport for Genedendal

31 August 2010

13:00 AM - 04:00 PM President's Mobilisation Programme: Zizi Kadwa 082 330 4010 and Shonglie Mila on 082 343 3705

05:60 PM -- 06:00 PM Stocked for Cabinet preparation (Ref Dr Siswana & Adv Malchone) -- Genadendal

Moeting with Minister Patel (Ref Lakela / Milks) -- Genadendal 06:00 PM - 07:00 PM

Artes VI

2018/11/20 12:20 PM

THE PRESIDENCY

REPUBLIC OF SOUTH AFRICA

2019 -04-2 3

1 September 2010

08:00 AM - 08:30 AM Depart Genadendal for Tsynhuys

08:30 AM - 02:00 PM Cabinet Chair - President -- Cape Town

04:00 PM - 04:30 PM Depart Tuynhays for Cape Town Intersectional Airport

04:30 PM - 05:30 PM Depart Cape Town International Airport for Waterkloof AFE

06:30 PM - 07:00 PM Depart Wateridgef AFE for EM

2 September 2010

98:00 AM - 06:00 PM Blocked at SM

07:00 PM - 88:00 PM Depart GM for Mahlamba Milliopfe

THE PRESIDENCY REPUBLIC OF SOUTH AFRICA

> 2019 -04-2 3 DECLASSIFIED

SECRETARY OF THE CARINE

3 September 2010

09:00 AM - 10:00 AM Depart Maidamhandlopfu for Gallagher Estate

10:00 AM • 01:00 FM Special NEC Contact: Nicky Hubu 0113761067 / 0826538742 -- Gallaghar Estata

03:30 PM - 02:00 PM Depart Gallagher Estate for Waterkipel AFB

92:00 PM - 93:00 PM Departure from Waterbloof to King Shaka Int'l Airport

03:00 PM - 07:00 PM Depart King Shaka Airport for Durban contact Sible Zikalala 98\$\$\$14945

07:00 PM - 08:00 PM Depart Durban for Kings House

4 September 2010

10:30 AM - 11:00 AM Depart Kings House for King Shaks International Airport

11:00 AM - 12:30 AM Depart King Shaka Int'l Airport for Bloemspruit AFB

11:30 AM - 12:00 PM Depart Bloomspreit AFB for Bultfortein contact: Herman 9832923427

12:00 PM - 02:30 PM Boertjiefees Bultforstein, Contact: Herman 0632923427

2018/11/20 12:33 PM

President Diary (TOP SECRET)

1

4 September 2010 Continued

52:30 PM - 03:30 PM Depart Bloomspruit AFB for King Shake Int'l Alport

03:30 PM - 04:00 PM Depart (Eng Shaka International House for Greytown (Halicopter)

04:00 PM - 06:30 PM Block

07:00 PM - 10:00 PM Zurns cian dinner. Contact Siles Zurna an 083 754 1687 (Ref: Delbey) -- Greybown

5 September 2010

10:00 AM - 04:00 PM Blocked for a family engagement in KZN

04:30 PM - 05:06 PM Depart Graytown for King Shaka International Airport (Halicopter)

05:00 PM - 06:06 PM Depart King Shalis International Airport for Wateridaaf AFB

6 September 2010

09:00 AM - 09:30 AM Depart Waterbloof AFS for Kruger Myumalanga Airport

09:30 AM - 10:30 AM Depart Bruger Mpumalanga Airport for Piet Retief (Helicopter)

10:30 AM - 05:00 PM Enviroleto; 25:1 Kodwa 082 330 4910 and Stoongite Mila on 082 343 3705 -- http://melanga

05:00 PM - 06:00 PM Depart Plot Retief for Netspruit (Helicopter)

87:00 PM - 97:30 PM Overnight at Ubuntu Kraol

7 September 2010

09:00 AM - 03:30 PM Immuseivio programme in Mpumalanga (Ref Lakela) -- Mpumalanga

04:00 PM - 06:00 PM Depart Kruger International Airport for Cape Town International Airport

06:00 PM - 06:30 PM Depart Cape Town Int'l Airport for Ganadensial

08:00 PM - 08:30 PM Meeting with Minister Sisalu

08:30 PM - 09:00 PM Meeting with Ms Makhane & Dr Slavrana

THE PRESIDENCY REPUBLIC OF SOUTH AFRICA

> 2019 -04-2 3 DECLASSIFIED

SECRETARY OF THE CABINE

2018/11/20 12:33 PM

President Diary (TOP SECRET)

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THE PRESIDENCY

REPUBLIC OF SOUTH AFRICA

2019 -04-2 3

SECRETARY OF THE CABINET

8 September 2010

08:00 AM - 08:30 AM Depart Genedendal for Tuynhuya

08:30 AM - 12:00 PM Joint Meeting of all Cabinet Committees (Ref Lusanda)

98:30 AM - 10:30 AM Cabinet Committee: Economic Sector, Employment and Infrastructure Development(ESBD) Chair -

President -- Cape Town

20:30 AM - 01:30 PM Cubinet Committee: International Cooperation, Trade and Security (ECTS) Chaired - President --

Cape Town

02:00 PM - 03:30 PM Questions in the National Assembly

05:00 PM - 05:00 PM - 05:00 PM Meeting with the Remmeration Committee (Ref Lakela / Bonisiwe) Contact Pater Malagem X 5344

- Tuynhuys

05:00 PM - 05:30 PM Onpart Tuynings for Genedendal

06:30 PM - 07:30 PM Sinch

9 September 2010

07:30 AM - 08:00 AM Depart Sepadendal for Tuyohuya

08:00 AM - 10:00 AM Cubinet Committee: Justice, Crime, Prevention and Security(JCPS) Chair - Dep. President - Cape

Town

10:00 AM - 11:30 AM ANC Chicus

11:30 AM - 12:30 PM Meeting with Minister Missons-Mashabane

12:30 PM - 01:00 PM Meeting with Ms Maldrene

01:00 PM - 01:30 PM Depart Toynhoys for Cape Town International Airport

02:00 PM - 04:00 PM Depart Cape Town Int'l Airport to Wateridoof Air Force Base

04:90 PM - 04:30 PM Depart Waterkloof AFB for Mahlamba Ndlopfu

10 September 2010

President Diary (TOP SECRET)

09:00 AM - 10:00 AM Meeting with NGOs to discuss their input to the UN Millenium Delevelopment Goal -- Mohlamba

Ndloptu

10:00 AM - 01:00 PM Blocked: Meeting Ref Lake(a / Zizi) -- Mahlamba Ndlopfu

A Control of the Cont

JGZ-PROC01/2020-APP-190

GEN-CORRESPONDENCE-043

10 September 2010 Continued

02:00 PM - 04:00 PM

Block (Ref: Delsey)

02:00 PM - 03:00 PM

Meeting with Advisors (Ref. Sifiso)

04:00 PM - 04:30 PM

Depart Mahiamba Ndiopiu for Johannesburg

04:30 PM - 05:00 PM

Depart Johannesburg for Mahlamba Heliopitu

05:00 PM - 05:30 PM

Official opening of the 2010 Airtel Champions League Teventy 20. Contact Carol on 083 628 6893 --

07:00 PM - 08:00 PM

Attenting with Mr. Gill (Marcus, Governor of the Reserve Bank (Ref Lakele) Contact: Sandre Brown at Cell: 0820699479 / (022) 313 4430 -- Mahlamba Milosfu

11 September 2010

08:00 AM - 08:30 AM

Depart Makineba Millopfu for Wateridgof AFB

08:30 AM - 09:30 AM

Depart Waterbloof AFE for Makhado AFE

20:00 AM - 22:30 AM

Limpopo PGC. Contact Joe 663 679 7474(Ref: Zbil) -- Nahhado Multi Purpose Centre.

12:00 PM - 01:00 PM

Depart Makhado AFS for King Shaka International Airport

01:00 PM - 01:30 PM

Depart King Shaks International for Hongorea (Helicopter)

01:30 PM - 04:30 PM

05:00 PM - 85:30 PM

Depart Hongoma for King Shaka International Airport

06:00 PM - 07:00 PM

Depart King Shake International Airport for Watersfood AFB

12 September 2010

09:00 AM - 04:00 PM

13 September 2010

09:00 A&A - 05:00 PM

Officials/NWC

02:00 PM - 02:00 PM

Meeting with President of Equatorial Guinea -- Luthuil House

06:00 PM - 06:30 PM

Depart Luthuli House for Mahlamba Ndlopfu

President Diary (TOP SECRET)

2018/11/20 12:33 PM

THE PRESIDENCY REPUBLIC OF SOUTH AFRICA

SECRETARY OF THE CABINET

THE PRESIDENCY

REPUBLIC OF SOUTH AFRICA

2019 -04-2 3

14 September 2010

G7:00 AM - 08:00 AM Depart Weterkloof AFB for Kimberley Airport

08:06 AM - 08:30 AM Depart Kimberley Airport for Orania (Helicopter)

OR:30 AM - 11:00 AM Meeting at Dr Boshof Residence. Contact Dr Carel Boshoff on 062 892 3150 or Frans de Klerk on 063

580 8229

11:00 AM - 11:30 AM Depart Grania for Kimberley sirport

11:30 AM - 12:30 PM Depart Kimburley sirport for Cape Town International Airport

12-30 PM - 02:00 PM Depart Cape Town International Airport for Tayrings

04:00 PM - 04:30 PM Interview with Moshoeshap -- Yayahays

06:00 PM - 07:00 PM Blocked for Cabinet preparations. In attendance: Adv Mabbene 8: Dr Siswane - Genedenska

15 September 2010

08:90 AM - 08:30 AM Depart Genedendal for Tugnings

G8:30 AM - 01:00 PM Cabinet Chair - President -- Cape Town

G3:00 PM - G3:30 PM Meeting with Mr Tshangiral

OL-30 PM - 05:30 PM Block

05:30 PM - 06:00 PM Depart Tuynhuys for Cape Town Int'l Airport

06:50 PM - 06:00 PM Depart Cape Town International Airport for King Shaka International Airport

08:00 PM - 06:30 PM Depart King Shaka International Airport for Kings House

16 September 2010

President Diary (TOP SECRET)

09:00 AM - 10:00 AM Depart Kings House for Sthembile Township, Dundee (Helicopter)

10:00 AM - 12:00 PM President's Mobilisation Programmer Zizi Kodera 982 330 4910 and Sibongile Mila on 082 343 3705

-- KwaZutu- Natai

12:00 PM - 12:30 PM Depart Dundee for New Castle (Driving)

G1:00 PM - 07:00 PM President's Mobilisation Programme: Zizi Kodura Q82 330 4910 and Sibonsile Mila on 082 343 5705

--- New Castle

GEN-CORRESPONDENCE-045

THE PRESEDENCY REPUBLIC OF SOUTH AFRICA

2019 -04-2 3

16 September 2010 Continued

07:00 PM - 07:30 PM

Depart Black Rock Hotel, New Castle for Kings House (Helicopter)

17 September 2010

08:00 AM - 08:30 AM

Depart Kings house for Vryheld, Emendio Community Hell (Hellcopter)

08:30 AM - 02:00 PM

President's Mobilication Programme: Ziel Kodon 082 330 4910 and Sibengile Mila on 082 343 3705

·· KwaZuta-Natal

02:00 PM - 02:30 PM

Depart Vryheid for Ulundi (Helicopter)

02:30 PM - 04:30 PM

President's Mobilisation Programmer: Zizi Kodere 082 330 4910 and Sibongile Mile on 682 343 3705

- Ulundi Are

04:30 PM - 05:00 PM

Depart Ulundi for Kings House (Fiellcopter)

18 September 2010

10:00 AM - 03:39 PM

rivate engagement -- Micardia

19 September 2010

09:00 AM - 09:30 AM

Depart Magazia for Kings Home (Helicopter)

30:00 Abr - 06:30 PM

BLOCKED

06:30 PM - 67:00 PM

Depart Mags House for ICC Durban

07:00 PM - 08:30 PM

NGC Gala dinner

08:30 PM - 10:30 PM

Global Sustainability Panel Video Conference - Hitton Hotel

10:30 PM - 11:00 PM

Depart Hilton for Kings House

20 September 2010

08:00 AM - 07:30 PM

NGC - Durban Exhibition Centre

21 September 2010

08:30 AM - 09:00 AM

Depart King's House for Moberi

President Diany (TOP SECRET)

THE PRESIDENCY

REPUBLIC OF SOUTH AFRICA

2019 -04-2 3

DECLASSIFIED

BECRETARY OF THE CABINE

21 September 2010 Continued

09:00 AM - 10:00 AM Attend signing ceremony at CIPLA Menufacturing. Contact: 0314513800 -- 1474 South Coast Road.

Mobeni

10:00 AM - 10:30 AM **Depart Mobeni for Durban Exhibition Centre**

10:30 AM - 04:00 PM NGC - Durban Exhibition Centre

22 September 2010

08:00 AM - 04:00 PM NGC -- Durben Exhibition Centr

07:00 PM - 08:00 PM Griefing on Belgium visit - Kings House

23 September 2010

DR:30 AM - 07:00 AM Reginning of School Holidays

08:00 AM - 06:30 PM NGC - Durban Exhibition Centre

24 September 2010

All Day **Haritage Day**

08:90 AM - 11:36 AM

12:00 PM - 03:30 PM Heritage day celebration in Durban. Contact at Ministry of DAC - Portia Matiala at 6429083909, e-malk portia.matiala@dac.gov.sa -- Durban

25 September 2010

All Day Shake Day

Tombstone unveiling coremony (Ref Milks) Contact: Noripho 082 907 9108/ Dineo0828077723 --10:30 AM - 02:30 PM

06:00 PM - 09:00 PM SATMA Awards. Contact: Ms Zelda Ferreira, tel.: 0861114816, e-meil:

zmforraira@ingwesnabalabala.co.zz -- Durban ICC

26 September 2010

09:00 AM - 07:00 PM Slocked to rest

2018/11/20 12:33 PM

President Diary (TOP SECRET)

JGZ-PROC01/2020-APP-194

GEN-CORRESPONDENCE-047

26 September 2010 Continued

11:30 PM - 12:00 AM

Depart King Shaka Airport for Brussels (12 hours)

27 September 2010

12:00 AM - 31:00 AM

Depart King Shaka Airport, for Brussels (12 hours)

Please See Above

10:00 AM - 10:30 AM

Arrival in Brussels (Ref: Delsey)

21:00 AM - 05:00 PM

Officials/NWC

28 September 2010

MA DE:80 - MA 90:80

Treasury Committee -- Pretoria

09:00 AM - Q4:00 PM

and SA / EU Summit Brussels

04:00 PM - 06:00 PM

Blocked for smeting with Agriculture Cluster Ministers (Ref Labels) - Genederdel

29 September 2010

M9 90:ED - MA 90:ED

Working visit to Brussels

06:00 PM - 06:30 PM

Depart Squasels for Wateridoof AFB

30 September 2010

08:00 AM - 05:00 PM

Blocked to rest

THE PRESIDENCY REPUBLIC OF SOUTH AFRICA

> 2019 -04-2 3 DECLASSIFEE

SECRETARY OF THE CAPINE

Antice for

THE PRESIDENCY REPUBLIC OF SOUTH APRICA

2019 -04-2 3

DECLASSIFIED

SECRETARY OF THE CASHIET

1 October 2010

08:00 AM - 12:30 PM Blacked to rest

18:00 AM - 10:30 AM Photo op with President and Heads of Missions

01:00 PM - 02:00 PM Depart Waterkloof AFB for King Shaka Internationi Airport

02:00 PM - 02:30 PM Depart King Sheka airport for Kings House

02:30 PM - 06:30 PM Mock

06:30 PM - 07:00 PM Depart Kings House for ICC

07:15 PM - 20:25 PM Jacob Zoma Foundation Fundralsing Disser (Ref Daley) -- Durban BCC

10:30 PM - 12:00 PM Depart NC for Rings House

2 October 2010

99:09 AM - 02:30 PM Block

02:30 PM - 03:00 PM Deport Kings House for Lymbon Half

03:00 PM - 05:00 PM Blocked: Wedding contact Sharen 002 883 6523 -- Lyeton Hall Estate, South Const

05:00 PM - 05:30 PM Depart Lynton Hall for Kings House

GG:30 PM - 07:00 PM Depart Kings House for ICC

U7:00 PM - 10:00 PM

Address a dimetr in honour of the Indian Disspora Conference to commenworste the 150th

Anniversary of the arrival of Indians in South Africa. (Ref Lainia) contact: Office of the Premier of

KZN Contact Person; Zoderno Mbull 071 854 7183 -- Durban ICC

3 October 2016

89:00 AM - 10:00 AM Depart Kings House for Kings House

10:00 AM - 05:00 PM Meeting with Americasi (Ref Nonhlamble) Contact: Dimbo Maobe 0767475889 -- Nixandia Nixosi

1

Muzemalaka

05:00 PM - 05:30 PM Depart Nicandly for King Shaka International Airport

05:00 PM - 07:00 PM Depart King Shaks Interestionel Alpert for Wateridoof AFB

President Diary (TOP SECRET)

4 - 6-3 PM

07:00 PM - 07:30 PM

Depart Wateridoof AFB for Mahiamisa Ndiopfur

4 October 2010

All Day

End of School Holidays

09:00 AM - 09:30 AM

Depart Mahlemba Mdlopfu for Luthuil House

10:00 AM - 05:00 PM

Officials/NWC

05:00 PM - 05:30 PM

Depart Lutiveli House for Mahlamba Ndiophi

5 October 2010

12:00 AM - 12:00 AM

State visit by President of Botswane, H.E. Lt. General Service Khame Iam Chame

09:00 AM - 12:00 PM

Welcome Ceremony, Blateral Meetings & Press Conference for Bolsswana State Viels -- Union

Building

12:00 PM - 02:09 PM

State Luncheon in honour of the President of Botswana -- Presidential Quest House

03:00 PM - 04:00 PM

Visit to Freedom Park

6 October 2010

12:00 AM - 12:00 AM

State visit by President of Sotswens, H.E. Lt. General Scretze Kharm Ian Khame

10:00 AM - 05:30 PM

Blocked

7 October 2010

09:00 AM - 03:00 PM

Black (Date Calcala)

8 October 2010

Block (Ref: Lakeia)

01:00 PM - 01:30 PM

Depart Bryintirion Estate for De Hoek Country Hotel, Magallesberg (Helicopter)

01:30 PM - 07:00 PM

Block (Ref: taketa)

Asstar Pl

2018/11/20 12:25 PM

THE PRESIDENCY REPUBLIC OF SOUTH AFRICA

2019 -04-2 3

President Diary (TOP SECRET)

.

9 October 2010

09:00 AM - 01:00 PM

Blacked for rest

03:00 PM - 01:30 PM

Depart De Hoek Magalleberg for Waterkloof AFB (Melloopter)

07:30 PM - 08:00 PM

Depart Mahlamba Ndiopfu for Waterkloof AFb

08:00 PM - 09:00 PM

Depart Waterkloof AFB for King Stake International Airport

10 October 2010

09:36 AM - 10:00 AM

Depart Kings House for Claremont

10:00 AM - 05:00 PM

Funeral Service John Mincanu, Contact Shu Sibiya on 072 130 6370 or Sible Zikalah on 082 551 4945.Details to follow - Sugar Ray Yadu Stadium, Claremont

06:30 PM - 67:00 PM

Depart (Gings House for ICC

07:00 PM - 20:00 PM

The President attends Karata Championships Gala Diamer. Contact Khampisani on 083 783 3389 or 082 447 6683 — ICC Sports Arena, Derban

11 October 2010

08:00 AM - 09:00 AM

Depart King Shaka International for Waterbloof AFB

09:00 AM - 10:00 AM

Depart Wateridgo! AFE for Luthuli House

10:00 AM - 05:30 PM

Officials/NWC

05:30 PM - 05:30 PM

Depart Lutholi for Wateridoof Airforce Base

07:00 PM - 09:00 PM

Depart Waterkloof Airforce Base for Cape Town Int'nai Airport

09:00 PM - 09:30 PM

Depart Cape Town International Airport for Genadendael

12 October 2010

10:00 AM - 02:00 PM

Meeting with DG's -- Genedendal

04:00 PM - 05:00 PM

Possible Meeting with DP and Minister of Finance on briefing Re: Division of Revenue Bill --

06:30 PM - 08:00 PM

Meeting with Minister Chabane - Genedendal

President Diary (TOP SECRET)

2018/11/20 12:25 PM

A die

THE PRESIDENCY

REPUBLIC OF SOUTH AFRICA

3

13 October 2010

MA 9E:80 - MA 90:80

08:30 AM - 63:00 OM Cabinet with Premiers/MEC's - Cape Town

03:30 PM - 03:45 PM President attends IShare Cape Town. (Ref Lakels/Ken Terry)

04:00 PM - 04:30 PM SABC Photo shoot. President's office

06:00 PM - 07:00 PM Blocked for briefing on Egypt State visit - Taynhays

07:30 PM - 08:00 PM Depart Toynhuys for Genadendal

14 October 2010

All Day

NOTE: President to welcome back the SA Commonwealth Games Team on their arrival (Exact date

and time TBABC

87:30 AM - 68:00 AM Depart Genedentise for Cape Term International Airport

08:00 AM - 08:30 AM Ospert Cape Yews International Airport for George Airport

08:30 AM - 09:00 AM Depart Searge Airport for Mossellay

09:00 AM - 01:00 PM Visit to Petro SA. (confirmed). Contact Garith on 082 559 1291/ email

tselise.maqubela@energy.gov.za (Ref: Minister of Energy) -- Mosselhay

81:00 PM - 01:30 PM Depart Mosselbay for George Airport

02:00 PM - 03:30 PM Depart George Airport for Wateridoof AFB

03:30 PM - 04:00 PM Depart Wateridoof AFB for Mahlumba Ndlopfu

07:00 PM - 08:00 PM Meeting with Minister Manuel (Ref Lakela) - Mahiamba Ndlop

REPUBLIC OF SOUTH AFRICA

THE PRESIDENCY

2019 -04-2 3 BIGHATURE

SECRETARY

15 October 2010

09:00 AM - 12:00 PM Maeting with Outcomes Coordinating Ministers on Employment, Ministers Patel; Gordinan, Davies.

DP's ettendance TBC -- Mahlamba Ndiopfu

Meeting with Outcomet Coordinating Ministers on Economic Infrastructure, Ministers Ndebele, Hogan, OP's attendence TRC -- Mahlamba Ndiopfu 03:00 PM - 03:00 PM

03:30 PM - 05:30 PM Meeting with Outcomes Coordinating Minister on Education, Ministers Motshekga .DP's attendance

TBC -- Mahlamba Nellopfu

2018/11/20 12:25 PM

Adie #1

President Diary (TOP SECRET)

06:00 PM - 08:00 PM

Meeting with Outcomes Coordinating Minister on Skills, Minister Nationande, OP's attendance TBC --

Mehlamba Ndlopfu

16 October 2010

08:00 AM - 07:30 PM

Blocked to rest (Ref Lakela)

17 October 2010

08:00 AM - 08:00 PM

BLOCKED (Ref Lateria)

08:00 AM - 08:30 AM

st

18 October 2010

09:00 AM - 20:00 AM

Depart Mahhamba Naliopfu for Listhuli House

20:00 AM - 03:00 PM

Officials/NWC

05:00 PM - 05:30 PM

Depart Luthuli House for GM

06:00 PM - 08:00 PM

Blocked (Net Vasi Zuma)

08:00 PM - 08:30 PM

Depart Johannesburg for Mahlamba Ndiopfu

09:00 PM - 09:30 PM

Depart Maidamba Mdlopfe for Waterldoff AFB

10:00 PM - 11:00 PM

Depart Waterkloof AFB for Cairo (\$ hours)

19 October 2010

08:00 AM - 04:00 PM

State visit to Egypt

20 October 2010

08:00 AM - 02:00 PM

State Visit to Egypt

01:00 PM - 03:00 PM

Depart Calso for Waterkloof AFB (9 hours) TBC

ANCE //

President Diary (TOP SECRET)

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2018/11/20 12:25 PM

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THE PRESIDENCY REPUBLIC OF SOUTH AFRICA

> 2019 -04-2 3 DECLASSIFIED

SECRETARY OF THE CABINET

21 October 2010

09:00 AM - 05:00 PM

Block

08:00 PM - 10:00 PM

09:00 AM - 11:00 AM

Blocked (Réf Lakela)

22 October 2010

Meeting with Outcomes Coordinating Minister on Human Settlements, Ministers Securale . DP's attendence TBC -- Mehianite Ndiopfu

13-30 AM - 01-30 OM Blasting with Outcomes Coordinating Minister on Local Government, Ministers Shiceka. DPs attentione TBC — Mahlamba Ndiopfu

01:30 PM - 02:30 PM ety photo shoot (Ref Lakela/ Zanela)

02-30 984 - 04-30 994 Meeting with Outcomes Coordinating Minister on the Environment, Ministers Sonice, DP's

attendance TBC - Makinmba Ndioptu

05:00 PM - 07:80 PM Mosting with Outcomes Coordinating Minister on Rural Development, Minister Mostrei. DP's attendance TBC -- Mahlemba Nellopfu

97:00 PM - 07:39 PM Confirmed meeting with his Marion Sparg, Contact 0824990327 - Mahlamba Nichorfu

23 October 2010

09:00 AM - 09:30 AM Depart Bryntision Estate for Emeric

99:30 AM - 01:00 PM Launch of Comden Power Station Contact Robyn Martin on 012 431 1121 or 882 875 6772 or emails

robyn.martin@dpe.gov.za -- near Emielo

01:00 PM - 02:30 PM Depart Emalo for Malmoth (Helicopter)

02:30 PM - 05:00 PM Blocked for family engagement. Contact Themba on 078 508 3552

05:00 PM - 05:00 PM Depart Melmotil for Kings House

GS:30 PM - 06:00 PM Depart Kings House for ICC

Jacob Zuma RDP Trust Seta learnership graduation ceremony. Contact Nokuthela Ngubane on 071 06:09 PM - 08:30 PM

970 3652 [Ref: Delsey] -- ICC

24 October 2010

07:00 AM - 07:30 AM Depart Kings House for King Shake International Airport

2018/11/20 12:25 PM

1.000

07:30 AM - 08:30 AM Depart King Shaka International for Waterkioof AFB

08:30 AM - 09:00 AM Depart Waterkloof AFB for Mahlamba Ndlopfu

09:00 AM - 12:00 PM Officials Meeting

Depart Maklamba Ndlopfu for Tembisa 12:00 PM - 12:30 PM

12:30 PM - 02:30 PM Banyana Banyana vs Zimbahwa match. More details to follow -- Makudang Stadium, Tembisa.

03-00 PM - 03-70 PM Depart Tembisa for Mahlamba Ndiopfe

05:30 PM - 05:30 PM Depart Mahiamba Ndlopfa for Gallagher Estate

06:00 PM - 09:30 PM The President attends the launch & Gale Dinner of Chess programme. Contact Sendile Xulu on 063

455 4730(Ref: Eugene) -- Gallagher Estate

09:30 PW - 10:00 PW Depart Gallagher Estate for Mahlamba Ndlopfu

25 October 2010

MA OE:30 - MA 00:30 Depart Mahlamba Ndlopfidi for the Union Bulklings

00:30 AM - 03:30 PM Special Cabinet Meeting -- Union Buildings

04:00 PM - 84:30 PM Meeting with Minister Mayende-Sibiya

05:00 PM - 05:30 PM Depart the Union Buildings for Mahlamba Ndlopfu

THE PRESIDENCY REPUBLIC OF SOUTH AFRICA

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SECRETARY OF THE CABINET

25 October 2030

19:00 AM - 10:30 AM Meeting with Senegal Special Envoy. Contact Ambassador of Senegal on 083 289 4605 (Ref: Dolary)

- Wahlamba Ndiopfu

10:30 AM - 17:00 AM Meeting with Palestinian Special Envoy (Ref Delsoy) - Mahiamba Nelloctu

21:00 AM - 21:30 AM Meeting with Tambo family (Ref: Nonhianhie

12:30 PM - 01:00 PM Depart Mahiaraba Ndiopfu for Wateridoof AFB

01:00 PM - 03:00 PM Depart Waterkloof AFB for Cape Town International Airport

03:00 PM - 03:38 PM Depart Cape Town International Airport for Genadendal

2018/11/20 12:25 PM

Add for

President Diary (TOP SECRET)

7

04:00 PM - 04:30 PM Briefing by Minister Gordhan & DDG Nane (093 4437740) in preparation for the teleconference with

the Korean President -- Genadendal

Q5:00 PM - 06:00 PM Pre Cabinet briefing. In attendance : Secretary to Cabinet

27 Gctober 2010

07:00 AM - 07:90 AM Teleconference with His Excellency LEE Myung-Balt, the President of the Republic of Koree, In

attendance DDG Name -- Genadendai

06:00 AM - 08:30 AM Depart Genadeodaal For Tuynhoys

08:30 AM - 02:00 PM Cabinet Chair - President -- Cape Town

03:00 PM - 03:30 PM Depart Tuymhuys for Cape Town International Airport

04:DC PM - 06:00 PM Depart Cape Your International Airport for Waterbloof AFB

THE PRESIDENCY REPUBLIC OF SOUTH AFRICA

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28 October 2016

08:30 AM - 09:00 AM Depart Mahiamba Mdiopfy for the Presidential Guest House

Credentials Gerenomy, Contact Princillo Naidoo (Ref. Delsey) — Presidential Guest House 10:00 AM - 05:00 PM

12:30 PM - 01:30 PM Break for lunch

04:30 PM - 05:00 PM Depart the Presidential Guest House for Maklamba Ndlopfu

29 October 2010

09:00 AM - 09:30 AM Depart Mahlamba Midlapfu for the Presidential Guest House

20:00 AM - 03:00 PM SA / Mozambique Economic Bilateral & Lanchson. Contact at the DTE Calvin Piname, Tel: +27 12

394 3084, Fan: +27 12 394 4084, Email:cphume@thedtl.gov.m -- Presidential Guest House

05:00 PM - 06:00 PM TO BE RESCHEDULED: Interview with Zwelinzina Sizane of Paperpush Productions on the late

national hero Barney Miclokoano (Ref Zanele) -- Mahiamba Niflopfu

30 October 2010

08:00 AM - 08:30 AM Depart Mahlamba Ndipfu for Waterkloof AFB

08:30 AM - 10:30 AM Depart Waterkloof AFB for Cape Town International Airport

2018/11/20 12:25 PM

Presiders Diary (TOP SECRET)

10:30 AM - 11:00 AM Depart Cape Town International Airport for Stellenbosch

11:00 AM - 01:30 PM ANC Youth League Raffy (Rof Zizi/Sibongile Mila) (exact times TBA -- Stellenberch

01:30 PM - 02:00 PM Depart Stellenbush for Cape Town International Airport

92:00 PM - 04:00 PM Depart Cape Town International Airport for Wateridouf AFB

04:00 PM - 04:30 PM Depart Waterkloof AFB for Magaliesberg (Helicopter)

04:30 PM - 05:30 PM Attend the 25th anniversay celebration of Minister & Mrs. Hzimande, Contact: Ngaba Ngandela 0796936829 (Ref Lainte) — Usiba Ladge, Magallesberg

06:30 PM - 10:00 PM Provisionally blocked for the CAF Wamen's championships tournement Gale Direct. (Ref: Lexeto

Philips) -- Maropeng. Krugersdorp

10:00 PM - 10:30 PM Depart Magaillesberg for Bryntinion Estate (Helicopter)

31 October 2010

05:00 PM - 06:00 PM Press Conference re cabinet restruttle -- Presidential Guest Hor

THE PRESIDENCY

SECRETARY OF THE CABINE

A. s. E

GEN-CORRESPONDENCE-057

1 November 2010

10:00 AM - 11:00 AM Depart Mahlamba Ndiophi for Luthuli House

12:00 AM - 01:30 PM Officials/NWC

11:00 AM - 11:00 AM Meeting with IEC to discuss 2011 Local Elections -- Luthuli House

01:30 PM - 02:00 PM Depart Luthuli House for the Presidential Guest House

52:00 PM - 04:00 PM Swearing in Commony of Ministers & Deputy Ministers -- Presidential Guest House

2 November 2010

07:00 AM - 07:30 AM Depart Mablemba Ndiopte

07:30 AM - 09:30 AM Depart Waterkloof AFB for Cape Town International Airport

09:36 AM - 10:00 AM Depart Cape Town International Airport for Tayahuya

10:00 AM - 10:30 AM Cabinet Committee: Governance Administration (GA) Cinir - Dop. President - Cape Town

10:30 AM - 01:00 PM Cabinot Committee: Social Protection, Community and Human Development Cheired - Protection

--- Cape Town

01:00 PM - 01:30 PM Meeting with Deputy Minister Mulder

62:30 PM - 03:30 PM Affecting with Zimbabwa facilitation team (Raf: Delsey)

05:30 PM - 06:00 PM Depart Toynhuys for Genadendal

3 November 2010
SECRETARY OF THE CABINET

08:00 AM - 08:30 AM Depart Genedendal for Tuynhays

08:30 AM - 10:30 AM Cabinet Committee: Economic Sectors, Employment and Mastructure Development (ESSIN)

Chair - President -- Cape Town

10:30 AM - 12:00 PM Cabinet Convenitues: International Coorporation, Trade and Security (ICTS) Chaired - President

-- Cape Town

01:00 PM = 03:00 PM Handover of the 2009 National and Provincial Elections Results Atlas . Contact Misnagist Kelembe on

012 622 5509 or 083 676 6007. (Ref: Delsey) -- Old Assemby Chambers

04:00 PM - 04:30 PM Meeting with Mr Pieter Mulder

President Diary (TOP SECRET)

2018/11/20 12:35 PM

AN:

THE PRESIDENCY

REPUBLIC OF SOUTH AFRICA

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05:00 PM - 05:30 PM

Meeting with Ministers

06:00 PM - 06:30 PM

Depart Toynhoys for Genadendal

4 November 2010

07:00 AM - 07:30 AM

Depart Geradendal for Cope Town International Airport

07:30 AM - 09:00 AM

Depart Cape Town International for Mindhoek, Namible

09:00 AM - 09:30 AM

Depart airport for the Presidential Guest House

10:00 AM - 03:00 PM

SA-Namibia Binational Commission (BNC) - Windhoek, Namibia

04:00 PM - 05:30 PM

Depart Namible for Waterland AFB

05:30 PM - 05:00 PM

Depart Waterbioof AFU for Mahiamba Hidlopfu

07:00 PM - 07:30 PM

Swearing in cerumony

5 November 2010

09:00 AM - 13:00 AM

uting Ministers on Justice. Minister Radabe. MOTE: DP is not

12:30 AM - 01:30 PM

Mosting with Outcomes Coordinating Minister on Public Service, Ministers Euloyi . Note: DP is not

available -- Mahlamba Ndiopfu

92:30 PM - 04:30 PM

Meeting with Outcomes Coordinating Ministers on ICTS, Ministers Nicoana Mashabane & Sicula. Note: DP's attendance confirmed - Mahlamba Ndiopfu

04:30 PM - 05:00 PM

Confirmed: Briefing by Minister Chabana & DG Lubbis on POSAD (Ref Lebala)

06:00 PM - Q6:30 PM

Depart Mahlamba Ndloph; for Saxonworld

06:30 PM - 08:30 PM

Diwali celebrations. (Ref: Delsey) -- Se

08:30 PM - 09:00 PM

Depart Saxonworld for Mahlamba Ndlopfu

6 November 2018

06:30 AM - 07:00 AM

Depart Mahlamb Ndlopfu for Waterkloof AFB

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SIGNATURE

SECRETARY OF THE CABINET

2018/11/20 12:35 PM

President Diary (TOP SECRET)

2

07:00 AM - 10:00 AM Depart Waterkloof AFB for Julius Nyerere Int'l, Dar es Salasm (flight deration = 3 hours) Note: arrivel

is at 11:00 local time

10:00 AM - 04:00 PM Attend the Presidential Inauguration in Dar et Salam, Tanzania

Depart Julius Myerere Int'l for King Shaka Int'l (Note: departure is at 17:00 local time, flight duration 04:00 PM - 07:30 PM

- 3h30)

07:30 PM - (0:00 PM Depart King Shaka Internetional Airport for Kings House

7 November 2010

09:30 AM - 10:00 AM Depart Kings House for Taylor's Halt, Pletermaritabung by Chopper

10:00 AM - 02:00 PM timbinshi Lucainsiane Launch & Cleansing Corespony (Ref Labels) (duration the) Connect Office of the

Premier of ICN 933 3413329 - Vullachda Sports Ground, Materian Roburg

02:00 PM - 62:30 PM Depart Taylor's Halt, Pletermaritaburg for lings House by Geopper

04:30 PM - 05:00 PM Depart Kings House for King Shaka International Airport

05:00 PM - 06:00 PM Depart King Sheks International for Waterbloof AFB

06:00 PM - 06:30 PM Depart Waterkioof AFR for Mahiamba Millopfu

8 November 2010

09:00 AM - 05:00 PM Officials/NWC

9 November 2019

08:00 AM - 05:00 PM Depart Wateridoof AFB for Secut, South Korea (Flying time 18hrs. Refuelling & change of creuc

10 November 2010

10:00 AM - 10:30 AM Arrival in Kersa

11:30 AM - 07:00 PM **Blocked (Ref Lekela)**

11 November 2010

President Diary (TOP SECRET)

09:00 AM - 07:00 PM G20 -- Seout

2018/11/20 12:35 PM

Airi M

THE PRESDENCY REPUBLIC OF SOUTH AFRICA

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SECRETARY OF THE CABINET

JGZ-PROC01/2020-APP-207

GEN-CORRESPONDENCE-060

12 November 2010

10:00 AM - 03:06 PM

Ğ20

10:00 PM - 10:30 PM

Depart Korea for Waterkloof AFB [18 hours]

13 November 2010

MA DE:80 - MA 00:80

Arrival from Korea

E0:00 AM - 10:30 AM

Depart Mahlamba Nellopfu for Gallagher Estate

11:00 AM - 06:00 PM

NEC -- Gallagher Estate

14 November 2010

08:00 AM - 08:50 AM

Depart Mahisashe Ndlopfu for Gallagher Estate

09:00 AM - 10:00 PM

NEC -- Gallagher Estate

05:00 PM - 05:30 PM

Ntate Elles Forewell lunch -- Mahlemba Ndiepha

10:00 PM - 10:30 PM

Depart Gallagher Estate for Mahlamba Ndiopfu

15 November 2010

09:30 AM - 10:00 AM

Depart Mahlamba Ndloofu

10:00 AM - 05:30 PM

Officials meeting -- Luthuil House

05:30 PM - 06:00 PM

Depart Lathull House for Mahlemba Hillopfu

16 November 2010

07:30 AM - 08:00 AM

Depart Mahlamba Ndipfu for Waterkloof AFB

08:00 AM - 10:00 AM

Depart Waterkloof AFB for Cape Town Interzetlanal Airport

10:00 AM - 10:30 AM

Depart Cape Town International Airport for Tuyrhuys

12:30 PM - 01:30 PM

Meeting with Minister Pandor & Deputy Minister Hanskom to discuss the Statesholder Council on Science & Innovation (Ref Lakele). Contact: Thulani Mavuso Chief Director: Ministerial Services; Tel. 012 843 6398 / 082 330 1404 -- President's Office

President Diary (TOP SECRET)

Acres 2018/11/20 12:35 PM

THE PRESIDENCY REPUBLIC OF SOUTH AFRICA

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Meeting with His Grace, Archbishop Ndungane. Contact: Carmel Fielies et 021 7131450 / 0839896965, e-mail: http://distorieschools.org.za -- President's office, Tuynhuye 63-00 PM - 63-30 RM

03:30 PM - 04:00 PM Briefing on Troits Video Conference by Minister of DIRCO & DWA

84-00 PM - 85-06 PM Troiks Video Conference on COF16 -- Room 26, Tayahays

03:00 PM - 05:30 PM Biocked for Meeting Ref Noublanhia)

65:30 PM - 06:00 PM Mosting with Mr Kgaryago.

06:30 PM - 07:00 PM Depart Tayabuys for Stellenbooch

07:00 PM - 10:00 PM acchi Zama Education Trest Dimer, Contact Zithelele Combi on 063 488 6100 , Details to follow --

Stellanbosch, Cape Town

10:00 PM - 10:39 PM Depart Stationhoseh for Genecicadal

17 November 2010

08:00 AM - 08:30 AM Dopert Genadendal for 120 Plain Street

Cobinet Committee: Economic Sectors, Employment and Infrastructure Development (ESEE) Chair - President -- Boardroom of the Ministry of State Security, 18th floor, 120 Piels Street (Ref Hilton Fisher, Cabinet Secretariet) 08:30 AM - 10:30 AM

10:30 AM - 01:00 PM

Cobinet Committee: International Cooperation, Trade and Security (ACTS) Chained - President
- Boardroom of the Ministry of State Security, 18th floor, 120 Plain Street (Ref Hilton Fisher, Cabinet

Secretarist)

03:30 PM - 02:00 PM Meeting with Premier Modifielle

82:00 PM - 86:00 PM Blocked for preparation for questions in Parliament

04:00 PM - 04:30 PM Meeting with Winister Diamini. President's office

04:30 PM - 85:30 PM Courbesy call by Mr JG Huping, Vice President of the People's Republic of Chine (1 + 3) In attendence: Minister of DRCO & SA Assistancier to China — Room 26, Toynhaya

05:30 PM - 06:00 PM Depart Toynhays for Genedendal

06:00 PM - 07:30 PM Meeting with Ministers -- Genedendai

09:30 PM - 09:00 PM Depart Genadendal for Green Point Stadium

THE PRESIDENCY REPUBLIC OF SOUTH AFRICA

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President Diary (TOP SECRET)

09:00 PM - 11:30 PM

Nelson Manuela Cup succer match (Ref Lakele) More info to follow -- Green Point Stadium, Cape

Towns

18 November 2010

97:30 AM - 08:00 AM

Depart Genadendal for Tuynhays

68-00 AM - 10-00 AM

Cabinet Committee: Justice, Crime, Prevention and Security (JCPS) Chair - Dep. President --

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SECRETARY OF THE CABINET

Banquat room, Tuyebuys

10:00 AM - 12:30 PM

AMC Corocus - Old Assembly Chamber

12:30 PM - 02:00 PM

Block Preparations for questions

02:00 PM - 04:00 PM

President's Oral Questions -- National Assembly

04:00 PM - 04:30 PM

Meeting with Minister of Fluence

04:35 PM - 05:50 PM

Briefing by Ministers of DERCO & DAFF and Amb Mithintso

05:90 PM - 06:00 PM

Meeting with Dr. Incount Cloud, DG of UN FAO. In attendance: Ministers of DIRCO, DAFF and DG Lubbi Contact at DIRCO, Mr Pitso Montwell, CD: Human Rights & Humanitarian Affairact 812 351

1540(Ref: Delsey) -- Room 25

06:00 PM - Q6:30 PM

Depart Toyohuys for Genadendal

07:00 PM - 08:00 PM

Dinner meeting with the executive of the Muslim Judicial Council = 16 members (Ref. Lakalo & Zhi), Contact: Moulene Hendricks TEL,0833846973; e-mail: Idearch@rejc.org.se . In attendence: Minister

Manuel - Genadendal

19 November 2010

06:00 AM - 06:30 AM

Depart Gonzdendal for Cape Town International airport

06:30 AM - 08:30 AM

Depart Cape Town International Airport for King Shake International Airport

08:30 AM - 09:30 AM

Depart King Shaka International Airport for Phuthaditjaisa (Helicopter)

10:00 AM - 21:00 PM

Address to the NCOP Sitting at Maketi a Phofung Municipality: -- Charles Mopeli Stadium, Free

State

01-30 PM - 02:30 PM

Depart Phuthaditieba for King Shaka International Airport (Helicopter)

03:00 PM - 04:30 PM

Depart King Shake Internations. Airport for Gaborone

President Diary (TOP SECRET)

05:00 PM - 07:00 PM

SADC Troiks Sthumit -- Gaborone

20 November 2010

10:00 AM - 03:00 PM

Precident to attend the official opening of SADC Headquarters building in Gaberone, Bottomane

04:30 PM - 05:30 PM

Depart Saborone for King Shaka International Airport

03:30 PM - 96:00 PM

Depart King State International for Kings House

21 November 2010

09:00 AM - 09:30 AM

Depart Kings House for Eshoura

30:00 AM - 03:00 PM

Identing Amelthosi Contact: Dibo Mirobe 8767475885 -- Eshows

03:00 PM - 03:30 PM

Depart Eshave for Kings House

04:00 PM - 05:00 FM

Block

05:30 PM - 06:00 PM

Depart iGngs House for ECC

09:00 PM - 09:30 PM

Attend the Third SABC Crown Gospel Husic Awards (Ref Diery Committee) Contact: Shu Bullefeel at 031 3033520 -- ICC Sport Arena, Durbers

09:30 PM - 10:00 PM

Depart ICC for Kings House

22 November 2010

MA 95-90 - MA 99:80

Depart Eings House for King Shaka International Airport

08:30 AM - 09:30 AM

Depart King Shaka International Airport for Waterkloof AFB

09:30 AM - 10:00 AM

Depart Waterbloof AFB for Luthuli House

22:00 AM - 05:00 FM

Officials/NWC

05:00 PM: - 05:30 PM

Depart Lutuli House for Mahlamba Naliopfu

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SECRETARY OF THE CABINET

23 November 2010

10:00 AM - 02:00 PM

Meeting with Ministers on International Relations -- Mahlamba Miliophy Pretoria

Ada /

President Diary (TOP SECRET)

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23 November 2010 Continued

05:00 PM - 06:00 PM

Pro Cabinet briefing. In attendance: Secretary to Cabinet -- Makiemba Milloylu

24 November 2010

08:00 AM - 08:30 AM Depart Mahlamba Ndiopfu for the Union Buildings

08:30 AM - 03:00 PM Cabinet Meeting -- Cabinet Room 145, Union Buildings

03:00 PM - 04:00 PM Depart Union Buildings for Wateridgef AFB

04:00 PM - 05:00 PM Depart Wateridgof AFB for King Shake International Airport

05:90 PM - 05:30 PM Depart King Shaka International Airport for RCC

06:00 PM - 08:00 PM Inhasi Albert Luthuli Lecture, Contact Theodi Luthuli on 083 454 6378 -- Inhasi Albert Luthuli ICC.

Durba

08:00 PM - 08:30 PM Meeting with Dr Intinez Suliman. Contact 083 236 4029

25 November 2010

12:00 AM - 12:00 AM BLOCKED FOR VISIT TO ZIMBABWE, in either Thursday or Friday [Ref Labels & DG Lubbil]

All Day Start of 25 days of Activism of No Violence against Women & Children (25 November - 10 December

2010)

09:30 AM - 10:00 AM Depart Kings House for Pietermanizhung (Pieticopter)

10:00 AM - 12:00 PM Visit to a school -- 100 Villiers Road, Clarendon, Pletermaritaburg

12:00 PM - 12:30 PM Depart Pletermaritzhung for King Shaka International Airport (Helicopter)

12:30 FM - 02:30 PM Depart King Shaka International Airport or Waterkloof AFB

02:30 PM - 03:00 PM Depart Waterkloof AFB for Mahlamba Ndlopfu

03:30 PM - 05:30 PM TO BE RESCHEDULED :Meeting with Outcomes Coordinating Minister on Health, Minister Motsoaledi,

8

DP's attendance TBC -- Mahlamba Adlopfu

05:30 PM - 06:00 PM Capart Mahlamba Ndioph: for Mildrand

06:00 PM - 08:00 PM Meeting of Jacob Zuma Education Trust. Contact Nokthule on 071 979 3652 - Midrand

A. S. O.

President Dlary (TOP SECRET)

08:00 PM - 09:30 PM

Depart Midrand for Mafdamba McRopfu

26 November 2010

12-05 AM - 12-00 AM

BLOCKED FOR VISIT TO ZIMBABWE, ie either Thursday or Friday [Ref Lakele & DG Lubis])

Please See Above

MA 05:80 - MA 00:80

Depart Mahlamba Nellopfu for the Union Buildings

03:30 AM - 22:00 PM

President's Coordinating Council Meeting (PCC) (Ref Norma) Contact at COGTA - Mandy Jacobs @ 012 3340920 email: amanda]@cogta.gov.za -- Cabinet Room

1.2:30 PM - 01:00 PM

Depart Union Bulldings for Wateridoof

02:00 PM - 02:00 PM

Depart Weterldoof for Harare

02:00 PM - 11:30 PM

Blockesk Harara

27 November 2010

08:00 AM - 22:00 FM

Funeral of Mrs Berthe Grown, Contact Manufia Feel 082 333 4285 -- Huntersfield Stadken, Kadi

12:00 PM - 12:30 PM

Depart Katlebong for NASREC

12:30 PM - 02:30 PM

Thouley girling currencery for Ma Mofelega, Contact Mrs Siblys on 083 515 2642 - Master, Hall 6

02:30 PM - 03:00 PM

Depart Masrec for Mehlamba Millopfu

04:00 PM - 06:00 PM

Depart Waterkloof AFB for Cape Town International

97:90 PM - 10:00 PM

Niischeli's Plain festivel. Contact Roserio Brown on 021 397 8000. In attendance: Minister Mans

28 November 2010

08:30 AM - 09:00 AM

Depart Genedendal for Cape Town International Airport

09:00 AM - 05:00 PM

Depart Cape Your International Airport for Lybia

29 November 2010

08:00 AM - 04:00 PM

Africa/EU Summit -- Tripoli

09:00 AM - 02:30 PM

Officials/NWC

President Diary (TOP SECRET)

q

2019 -04-2 3 DECLASSIFIED

THE PRESIDENCY REPUBLIC OF SOUTH AFRICA

SECRETARY OF THE CABINET

JGZ-PROC01/2020-APP-213

GEN-CORRESPONDENCE-066

30 November 2010

08:00 AM - 01:30 PM

Africa/EU Summit - Tripuli

98:30 AM - 10:30 AM

Cabinet Committee: Governance and Administration (GA) Chair Honourable Deputy President (To

10:30 AM - 01:30 PM

Cabinet Constrictive: Social Protection, Community and Human Development (SPCHD) Chair - His Excellency The President(To Apalogise) -- Pretoria

09:00 PM - 12:00 AM

Depart Lybia for Waterkloof AFB

THE PRESIDENCY REPUBLIC OF SOUTH AFRICA

A Kin

President Diazy (TOP SECRET)

10

JGZ-PROC01/2020-APP-214

GEN-CORRESPONDENCE-067

THE PRESIDENCY
REPUBLIC OF SOUTH AFRICA

2019 -04-2 3

SECRETARY OF THE CABINET

1 December 2010

All Day

World AIDS Day (President not attending)

12:00 AM - 05:00 AM

Depart Lybia for Wateridoof AFB

01:30 AM - 02:30 AM

Possible Arrival from Libya

08:00 AM - 08:15 AM

Depart Mahlamba Ndiopfu for Union Buildings

MA 95:20 - MA 05:80

Cabinet Committee ICTS

09:30 AM - 11:06 AM

Cabinet Committee (JCPS)

11:00 AM - 12:30 PM

Cabinet Committee (ESEID)

12:30 PM - 01:30 PM

Cabinet Committee (JCPS)

02:00 PM - 03:00 PM

Meeting with Minister Natmande and Minister Gordhan -- Union Buildings

03:30 PM - D4:00 PM

Depart Mahlamha Midopfu for Bryanston

04:00 PM - 06:00 PM

Jacob Zuma Foundation Bourd Meeting. Contact Dudy on 882 875 4002 (Ref Dubey) — Unit 2, Atterbury House, Bryanston

0.0

06:00 PM - 06:30 PM

Depart Bryanston for Mahlamba Ndiophu

07:68 PM - 68:80 PM

POSTPONED: Meeting with South African National Deaf Association (Red: Lakels as per diary recommendations) -- Mahimba Ndionfu

2 December 2010

09:00 AM - 12:30 PM

Confirmed Incoming State visit by His Excellency Mr Rupish Burezani Banda, Procident of Zambia

12:30 PM - 01:00 PM

Visit to Freedom Park (Exact time the)

83:00 PM - 04:30 PM

Blocked for meeting with Councillor Prinsloo. Contact 011 333 2001 or 082 414 2667. (Ref. Delsey) -- Mahlemba Midlopfu

07:00 PM - 09:00 PM

Olnowr in honour of His Excellency Mr Ruplah Bwezoni Bunda, President of Zambia -- Presidential Guest House

3 December 2010

All Day

International Day for People with Disabilities

President Diary (TOP SECRET)

2018/11/20 12:27 PM

1.3 C

GEN-CORRESPONDENCE-068

3 December 2010 Continued

09:00 AM - 09:30 AM

Depart Mahlamba Ndlopfu for Benont

10:00 AM - 11:00 AM

Wreath laying ceremony at the grave of President Oliver Tambo -- Watville, Benoni

13:00 AM - 11:30 AM

Visit to Adelaide Tambo Skills Development Centre for People with Disabilities to mark International

day of Persons with Disabilities . Contact: Zanele - Senoni

12:00 PM - 02:30 PM

Address Business Forem and Luncheon hosted by the DTI -- Raddison Blu Hetel, Sandton

03:00 PM - 03:30 PM

Deport Sandton for Centurion

43:30 PM - 05:00 PM

12th International Meeting of Communist Workers Party — Suran Lake

05:00 PM - 05:30 PM

Depart Conteriors for Maldamba Nellopfu

4 December 2010

13:00 AM - 01:30 PM

COSATU 25th Anniversary Celebration -- Johannesbury Stadio

84:30 PM - 67:00 PM

07:00 PM - 07:30 PM

Depart Waterkloof AFB for Havena, Cubs. (Ref: Delsey)

5 December 2010

10:00 AM - 06:00 PM

6 December 2010

08:00 AM - 08:30 AM

09:30 AM - 06:00 PM

State visit to Cuba

10:00 AM - 01:00 PM

Officials/NWC

A. N. 2 //

President Diary (TOP SECRET)

2

2018/11/20 12:27 PM

THE PRESIDENCY REPUBLIC OF SOUTH AFRICA

SECRETARY OF THE CABINET

GEN-CORRESPONDENCE-069

7 December 2010

08:00 AM - 06:00 PM

State visit to Cuba

8 December 2010

10:00 AM - 11:00 AM

Depart Cuba for Mexico. Exact time TBC (10:00 are local time)

9 December 2010

08:00 AM - 05:00 PM

Mississ Mississe Visit

08:00 AM - 08:30 AM

06:00 PM - 06:30 PM

Depart Cancus Mexico for Wateridoof AFB

10 December 2010

All Day

Beginning of School Holidays

CE:00 AM - 08:30 PM

Block

49:00 PM - 03:30 PM

Arrival from Mexico

THE PRESIDENCY
REPUBLIC OF SOUTH AFRICA

2019 -04- 2 3 DECLASSIFIED SECRETARY OF THE CA

11 December 2010

All Day

98:30 AM - 11:90 AM

POSTPONEIX NEPAD infrastructure sub committee meeting. Contact Dumiss on GE2 908 4798 --

Presidential Guest House

11:00 AM - 11:30 AM

Depart the Presidential Guest House for Forest Town

07:20 PM - 12:00 AM

Blocked (Ref Duriusle Zuma)

12 December 2010

All Day

NOTE: Request by Duduzile Zuma

12:00 AM - 04:30 AM

Blocked (Ref Duduzile Zuma)

Please See Above

08:00 AM - 08:30 AM

President Diary (TOP SECRET)

2

2018/11/20 12:27 PM

A-34 //

THE PRESIDENCY

REPUBLIC OF SOUTH AFRICA

2019 -04-2 3 DECLASSIFIED

BECRETARY OF THE CABINET

12 December 2010 Continued

10:30 AM - 11:00 AM

Depart Bryntirion Estate for Minubaths

11:00 AM - 01:00 PM

Address to the Young Communist League 3rd National Congress Report back relly. Contact Motahedial Letuka on 983 759 4158 or 911 335 3621 — Mentahloa Stadium, Mmahatho

01:00 PM - 01:30 PM

Depart Mmabatho for Bryntision Estate

02:30 PM - 04:00 PM

PPU End of year party

13 December 2010

09:00 AM - 09:30 AM

Depart Mahlamba Ndiopfu for Lathuil House

12:00 PM - 04:00 PM

Officials/NWC

04:00 PR# - 05:00 PM

Meeting with Mr Biotler and Launch of 2010 FifA World Cap Legacy Trust -- Soccer City

05:00 PM - 08:00 PM

Opening ceremony of 17th World Festival of Youth & Students (WFYS) Contact: Bernice Higgsle, tel-

079892**4828 -- Atteridgeville**

14 December 2010

09:00 AM - 04:00 PM

Incoming state visit by Angola. Refer to Order of Proceedings for Official meeting, Lancheon and visit to Freedom Park

07:00 PM - 08:00 PM

Private direser with President of Ampole -- Madelemba Addoofs

15 December 2016

All Day

Blocked for leave

07:30 AM - 08:00 AM

Depart Mahlamba Ndiopfu for Wateridoof AFB

GB:00 AM - 10:00 AM

Depart Wateraloof AFB for Cape Town International Airport

18:00 AM - 10:30 AM

Depart Cape Town International Airport for Robben Island (Helicopter)

11:00 AM - 01:00 PM

Visit to Robben island

01:00 PM - 01:30 PM

Depart Robben Island for Groote Schuur Estate (Helicopter)

01:30 PM - 02:30 PM

Luncheon for President and Mrs Dos Santos -- Genadendal

President Diary (TOP SECRET)

2018/11/20 12:27 PM

15 December 2010 Continued

03:30 PM - 04:00 PM

Depart Genedendal for Cape Town International Airport

04:00 PM - 06:00 PM

Depart Cape Yown International Airport for Wateridoof AFB

06:00 PM - 06:30 PM

Depart Waterkloof AFB for Mahlemba Ndiopfu

06:30 PM - 07:30 PM

Courtesy call (Ref: Delsey)

16 December 2010

All Day

Day of Reconciliation

10:00 AM - 12:30 PM

Armed Forces Day. Contact General Motumi on 012 671 1212 or General 082 853 3633 (Ref: Delsay) - Thaka Tsheene Military Sports Ground

02:00 PM - 04:00 PM

Wedding celebration, Contact Silas Zuma on 883 734 1687 - Midrand

17 December 2010

12:00 AM - 12:00 AM

Effectional Sea Sugar

09:00 AM - 11:30 AM

NEPAD Infrastructure meeting — Presidential Guest House

10:00 AM - 11:30 AM

Slocked Ref Norblashia - Mahibmha fallopfu

12:30 PM - 02:30 PM

Meeting to discuss the Presidential Hotime. In attendance : Confirmed - Minister Chabene; Deputy

Minister Pule & DG Dr Lubisi -- Mahiamba Miliopfu

06:90 PM - 03:00 PM

Function for Jacob Zerne Foundation. Contact Dudu on 682 875 6902 -- Woodmand

18 December 2010

12:00 AM - 12:00 AM

Blocked for leave

Please See Abov

MA 08:30 - MA 00:50

Depart Maklamba Mdlopfu for Waterideef AFB

08:30 AM - 09:30 AM

Depart Wateridoof AFB for King Shake International Airport

09:30 AM - 10:00 AM

Depart King Shaka International for Bergville (Hellcopter)

30:00 AM - 02:00 PM

Blocked for Marathon. Contact Willy Mitolo on 083 654 0393 (Ref Minister Diamini Zuma) More

President Diary (TOP SECRET)

LAK /1 2018/11/20 12:27 PM

THE PRESIDENCY REPUBLIC OF SOUTH AFRICA

2019 -04-2 3

SECRETARY OF THE CABINET

THE PRESIDENCY REPUBLIC OF SOUTH AFRICA

SECRETARY OF THE CABINET

18 December 2010 Continued

02:00 PM - 02:30 PM

Depart Bergville for Kings House (Helicopter)

83:00 PM - 03:90 PM

Stocked @ King House

19 December 2010

09:00 AM - 09:30 AM Deput Kings house for Nicendia

10:00 AM - 01:00 PM Micholozi Soccer Tournamentent. Contact Dudu on 082 875 6082 - Micandia

02:00 PM - 82:00 PM Depart Micandia for Pine Town (Chapper)

02:00 PM - 03:30 PM Blocked for Gogo party. Therebi Xabe 079 273 5885 or Mr Nxele on 082 825 5686 - Saveta Park.

03:30 PM - 04:30 PM Depart Pine Town for Niumdla

20 December 2010

12:00 AM - 12:00 AM Blocked for Leave

01:00 PM - 01:30 PM Depart Mkandle for King Shake International Airport

02:00 PM - 08:30 PM Depart King Shaka International Airport for Conakry

21 December 2016

All Day Blocked for Leave Please See Above

10:00 AM - 04:30 PM Inauguration of the President of the President of Guinea Conakry

Q5:20 PM - 30:00 PM Depart Conakry for King Shaka International Airport

President Diary (TOP SECRET)

2018/11/20 12:27 PM

Action for

22 December 2010

All Day

Blocked for Leave

Please See Above

10:00 AM - 10:30 AM

Depart Kings house for Mkandla

11:30 AM - 02:30 PM

Chess tournement. Contact Mr Xulu on 0824554730 -- Micandla

23 December 2010

All Day

Blocked for Leave

Dieses Son About

10:00 AM - 04:00 PM

Blocked

24 December 2010

Ali Day

Blocked for Leaves

Please See Above

25 December 2010

All Day

Blocked for Leave

Please See Above

06:30 AM - 07:00 AM

Christman Dave

se See Above

THE PRESIDENCY REPUBLIC OF SOUTH AFRICA

26 December 2010

All Day

Hocked for Leave

Day of Goodwill

....

DECLASSIFIED

SIGNATURE

DECRETARY OF THE CABINET

27 December 2010

05:30 AM - 07:00 AM

All Day

Blocked for Leave

Please See Above

08:00 AM - 08:30 AM

Public Holiday

10:00 AM - 03:00 PM

Gogo party

28 December 2010

All Day

Blocked for Leave

Please See Above

President Diany (TOP SECRET)

A sta

2018/11/20 12:27 PM

28 December 2010 Continued

11:00 AM - 11:30 AM Detail

Depart Nkandia for Kings House (Helicopter)

12:30 PM - 01:00 PM

Depart Kings House for SABC Studios Durban

01:00 PM - 03:00 PM

Recording for New Year's Day Message: Ref Majola -- Durban

03:00 PM - 03:30 PM

Depart SASC Studios for Kings House

04:00 PM - 64:30 PM

Depart Kings House for Alcandla

29 December 2010

All Day

Blocked for Leave

Please See Above

08:00 AM - 08:30 AM

09:00 AM - 62:00 PM

Children's party

30 December 2010

Ali Day

Elected for Leave

Please See Above

10:00 AM - 02:00 PM

Official Opening of Kwahedala Old Age Home, Contact Mr Memela 862 653 \$145 / Thalelani Cele 033 341 3600 -- Nikandia

31 December 2010

All Day

Blocked for Leave

Please See Above

THE PRESIDENCY REPUBLIC OF SOUTH AFRICA

> 2019 -04-2 3 DECLASSIFIED

BIGHATUR

SECRETARY OF THE CABINET

AXX pl

President Diary (TOP SECRET)

2018/11/20 12:27 PM

Shannon S. Van Vuuren

From:

Peter P. Pedlar

Sent:

Friday, 31 May 2019 16:10

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. Pediar

Noting 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: Friday, May 31, 2019 3:14 PM

To: Peter P. Pedlar < Peter P@commissionsc.org.za>

Subject: APPEARANCE OF FORMER PRESIDENT, MR. JACOB ZUMA, BEFORE THE COMMISSION

Importance: High

Pear Sir,

Attached please find a letter for your attention.

Kind regards, Yvonne



First floor Burnside Island | Block 6 | 410 Jan Smuts Ave | Craighall | Johannesburg Tel: 011 781 0099 | Fax: 011 781 0526 | e-mail: Info@lugisanimantshaattomeys.co.za | 80x 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

- We refer to the letters from the Commission dated 30 April and 06 May 2019.
- 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

1

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.
- 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

Shannon S. Van Vuuren

From:

Boipelo B. Ratshikana

Sent:

Friday, 07 June 2019 16:18

To:

dan@lugisanimantshaattorneys.co.za; info@lugisanimantshaattorneys.co.za

Cc:

Peter P. Pedlar, Andre A. Lamprecht; Ouma Thagane; Shannon S. Van Vuuren

Subject:

Letter to Former President Jacob Zuma

Attachments:

Letter to Former President J Zuma dated 07 June 2019 2.pdf

Dear Mr Dan Mantsha

Please receive attached letter on behalf of your client Former President Jacob Zuma.

Kind Regards,

Bołpelo Ratshikana **Executive Assistant to the Secretary** COMMISSION OF INQUIRY INTO STATE CAPTURE

Hillside House, 2rd 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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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

7 June 2019

Lugisani Mantsha Attorneys 1st floor, Burnside Island Block 6, 410 Jan Smuts Ave, Craighalf, Johannesburg Att: Mr Dan Mantsha

dan@lugisanimantshaattorneys.co.za

Dear Sirs

Re: Appearance of former President Zuma before the Commission

- 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 Monyane'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

Shannon S. Van Vuuren

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

LUGISANI MARTSHA ATTORNEYS

The erral and any lies transmited with a re-confidential and planted solely for the use of the redelicial or array to when they are addressed. If you have received this erred is error plante only the system manager. This message continue confidential information and is intended only for the individual named. If you are not the intended entry for the sender introduction or copy the e-mail. Plante notify the sender introductely by e-mail if you have received this e-mail by mistale and deline this e-mail from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any exact in reliance on the contents of this information is strictly prohibited.

STAT



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

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,

APPEARANCE OF FORMER PRESIDENT, MR. JACOB ZUMA, BEFORE RE: 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

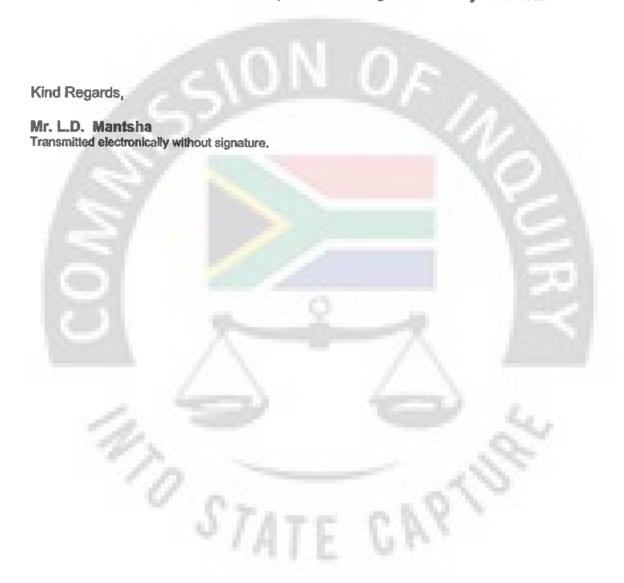
the questions and issues the Commission would like our client, former President Zuma, to deal with.

- 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

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.



Paul Pretorius SC

From: info@lugisanimantshaattorneys.co.za

Sent: 18 July 2019 03:53 PM **To:** Paul Pretorius SC

Subject: APPEARANCE OF FORMER PRESIDENT, MR. JACOB ZUMA, BEFORE THE

COMMISSION

Attachments: Letter to Adv Pretorius 18 July 2019.pdf

Follow Up Flag: Follow up Flag Status: Flagged

Dear Advocate Pretorius,

Please find forwarded herewith, a letter for your urgent attention.

Regards,

Dayna Arnoldi

LUGISAN MANTSHA FTTORNEYS

410 Jan Smuts Ave Burnside Island Office Park Block 6

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From: info@lugisanimantshaattorneys.co.za <info@lugisanimantshaattorneys.co.za>

Sent: Thursday, 18 July 2019 15:33

To: 'Boipelo B. Ratshikana' < BoipeloR@commissionsc.org.za>

Subject: APPEARANCE OF FORMER PRESIDENT, MR. JACOB ZUMA, BEFORE THE COMMISSION

Dear sir/Madam,

Kindly find attached letter for your attention.

Kind regards, Dayna



410 Jan Smuts Ave Burnside Island Office Park Block 6

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First floor | Burnside Island | Błock 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

Att: Adv Pretorius SC Commission of Inquiry

And

Ms K B Shabalala Acting Secretary Commission of Inquiry

Per email: BoipeloR@commissionsc.org.za

Date: 18 July 2019

"PRIVATE AND CONFIDENTIAL" "URGENT"

Dear Adv Pretorius,

RE: APPEARANCE OF FORMER PRESIDENT, MR. JACOB ZUMA, BEFORE THE COMMISSION

- 1. We refer to the above matter.
- As directed by the Chairperson, we have indeed considered our client's position in respect of his engagement with and participation in the further proceedings of the Commission.

3. We therefore address this letter to you to record our client's position, which is informed by his own experience of the Commission having presented himself

at the Commission's invitation, which was described by the Commission as a

courtesy.

4. Our client's misgivings about how the Commission approached him are

recorded in the correspondence exchanged between the Commission and

ourselves.

5. Despite the reservations set out in our correspondence, our client, out of

respect for the citizens of this country and the Commission, felt it was necessary

to honour the invitation. These reservations were repeated by our counsel

during the proceedings on 15 July 2019, when our client appeared before the

Commission.

6. On the second day, our client personally, and through our counsel raised

several objections to the manner in which he was invited and treated. In fact,

his reservations were fortified when he was subjected to relentless cross-

examination. This was despite the undertaking that he would not be cross-

examined.

7. We hold a strong view that it is the Commission that must assure our client that

it is still capable of curing what we view as serious procedural deficiencies.

8. Kindly revert to us with a proposal on how our client's serious complaints and

reservations can still be remedied to safeguard the rights of our client and the

integrity of the Commission.

Yours Faithfully,

Mr. L.D. Mantsha

Transmitted electronically without signature.

Paul P. Pretorius

From: Shannon S. Van Vuuren
Sent: Shannon S. Van Vuuren
Thursday, 18 July 2019 17:25

To: info@lugisanimantshaattorneys.co.za; tmasuku@law.co.za; mpilo@sikhakhane.co.za

Cc:Brigitte Shabalala; Boipelo B. Ratshikana; Warren Redcliffe; Ouma ThaganeSubject:RE: APPEARANCE OF FORMER PRESIDENT, MR. JACOB ZUMA, BEFORE THE

COMMISSION

Attachments: 18 July 2019 - Zuma - LM Attorneys.pdf

Dear Sirs

Please find attached hereto correspondence marked for your attention.

Kindly acknowledge receipt.

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 | lwww.sastatecapture.org.za



From: info@lugisanimantshaattorneys.co.za <info@lugisanimantshaattorneys.co.za>

Sent: Thursday, 18 July 2019 15:33

To: Boipelo B. Ratshikana < Boipelo R@commissionsc.org.za >

Subject: APPEARANCE OF FORMER PRESIDENT, MR. JACOB ZUMA, BEFORE THE COMMISSION

Dear sir/Madam,

Kindly find attached letter for your attention.

Kind regards, Dayna



🖾 info@lugisanimantshaattomeys.co.za 💆 011 781 0099 😩 www.lugisanimantshaattomeys.co.za

410 Jan Smuts Ave Burnside Island Office Park Block 6

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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

18 July 2019

To:

Mr D Mantsha

Lugisani Mantsha Attorneys

E-mail: info@lugisanimantshaattorneys.co.za

Dear Sirs

RE: FORMER PRESIDENT ZUMA: APPEARANCE BEFORE THE COMMISSION

- 1. We acknowledge receipt of your letter of today, 18 July 2019.
- The Commission's Legal Team continues to assert all the powers of the Commission contemplated by the Commissions Act, the Regulations and the Rules.
- The Chairperson of the Commission has the discretion to call witnesses to give oral
 evidence before the Commission. Former President Zuma responded to an invitation
 from the Chairperson to appear.
- 4. Regulation 8(1) provides that no person appearing before the Commission may refuse to answer any question on any grounds other than those contemplated in section 3(4) of the Commissions Act, 1947. Rule 3.2 allows a member of the Commission's Legal Team to put questions to a witness which include "questions aimed at assisting the Commission in assessing the truthfulness of the evidence of a witness." Indeed, that forms part of the duties of the Legal Team.
- The Commission's Legal Team has not made, and does not intend to make, any
 concessions in this regard. All witnesses are equally entitled to fair procedures and to
 fairness in the application of procedures.
- 6. Former President Zuma has not yet been cross-examined. He is still in the process of being asked questions to elicit his full response in detail in respect of the matters

raised by the nine witnesses whose statements implicating him have been furnished to him for purposes of this week's hearings. The process will necessarily have to be continued well beyond the scope of the matters raised by these particular witnesses.

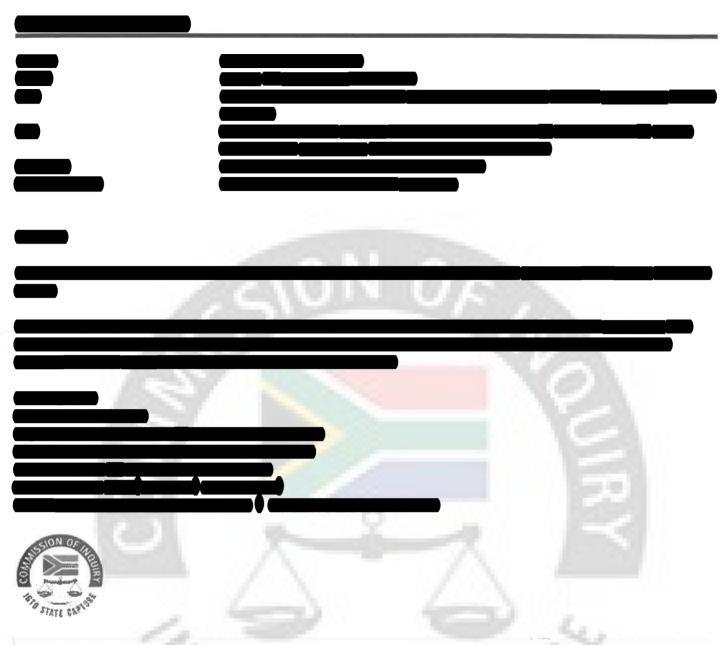
- 7. The need for cross-examination will be addressed in terms of the Rules when it arises.
- 8. It is denied that Mr Zuma's procedural objections, complaints and reservations are valid. His rights and the integrity of the Commission will be fully safeguarded by continued adherence to the Commissions Act, Regulations and Rules. No proposal to deviate from these provisions will be forthcoming.
- 9. Accordingly, the Legal Team's intention is to proceed with the hearing tomorrow.

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



From: info@lugisanimantshaattorneys.co.za [mailto:info@lugisanimantshaattorneys.co.za]

Sent: Wednesday, 04 September 2019 11:32

To: Boipelo B. Ratshikana < Boipelo R@commissionsc.org.za>; Shannon S. Van Vuuren

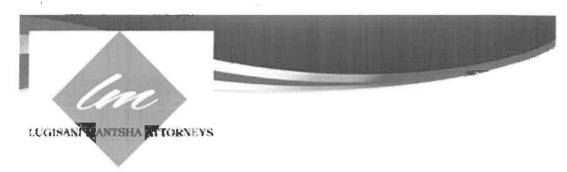
<ShannonV@commissionsc.org.za>; Ppretorius@commissionsc.org.za

Subject: FORMER PRESIDENT, MR. JACOB ZUMA

Dear Sir/Madam,

Please find attached hereto a letter for your attention.

Kind regards, Yvonne



☑ info@lugisanimuntshaattomeys.co.za 💆 011 781 0099 🖶 www.lugisanimantshaattomeys.co.za.

¶ 410 Jan Smuts Ave Burnside Island Office Park Block 6

This amailiand any time transmitted world are confidential and intended totally for the use of the individual or anily to an an they are applicated. If you have received this probable ment places in only the system manager. This makeage contains confidential informations and is selected only for the individual named. If you are not the man of addresses you should not considerate or did but not only the email of the individual named. If you have release so addresses you should not considered in the make the received the man of the probable of the man of the received the man of the received you are notified into object the probable of the man of the individual or an interview or the confidence of the information is sincely profiled.



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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: <u>Ppretorius@commissionsc.org.za</u>
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.
- 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.
- 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 Siphiwe 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

JGZ-PROC01/2020-APP-247

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.

3

Boipelo B. Ratshikana

From:

in fo@lugis animants haat torneys. 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.



OSTA



First floor (Surnside Island | Block 6 | 410 Jan Smuts Ave | Oregnall | Johannesburg Tel: 013, 781 0099 | Fax: 011, 781 0526 | e-mail: <u>Info@lugasormanismaatromeys.cu.za</u> | Box 1217 | Bandburg | 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

- 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

CC: Adv Pretorius SC

Per email: <u>Ppretorius@commissionsc.org.za</u>
And to: <u>ShannonV@commissionsc.org.za</u>



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:

THE COMMISSION

APPLICANT

and

JACOB GEDLEYIHLEKISA ZUMA

RESPONDENT

NOTICE OF INTENTION TO OPPOSE

KINDLY TAKE NOTICE THAT the Respondent hereby gives his notice of intention to oppose the Application.

AND TAKE NOTICE FURTHER THAT the Respondent shall receive all Notices, processes, and pleadings in this matter in the address mentioned herein below.

DATED at Johannesburg on this the 06th day of January 2020.

LUGISANI MANTSHA INCORPORATED

Respondent's Attorneys

No. 410 Jan Smuts Avenue

Burnside Island

Block 6, First Floor

Craighall, Johannesburg

P O Box 1127

Randburg, 2125

Tel: (011) 781 0099

Fax: (011) 781 0526 Our Ref: LW0257/18/c

Email: info@lugisanimantshaattorneys.co.za

TO: MS. K B SHABALALA ACTING SECRETARY OF THE COMMISSION OF INQUIRY

Per email: BoipeloR@commissionsc.org.za

2nd Floor, Hillside House

17 Empire Road

Tr Linpite Road

Parktown

Johannesburg

2193

Tel: 010 214 2651 Tel: 0800 222 097

AND TO: HONOURABLE JUSTICE ZONDO

THE CHAIRPERSON OF THE COMMISSION OF INQUIRY

2nd Floor, Hillside House

17 Empire Road

Parktown

Johannesburg

2193

Tel: 010 214 2651

Tel: 0800 222 097

AND TO: P J PRETORIUS
Head of the Legal Team

2nd Floor, Hillside House 17 Empire Road Parktown Johannesburg 2193

Tel: 010 214 2651 Tel: 0800 222 097

Per email: Ppretorius@commissionsc.org.za



Boipelo B. Ratshikana

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

LUGINARI MANTSHA ATTORNEYS

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First floor | Burnside Island | Block 6 | 410 Jan Smuts Ave | Craighall | Johannesburg Tel: 011 781 0099 | Fax: 011 781 0525 | e-mail: | Info@lugisanimantshaattorneys.co.za | 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: BeipeloR@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: <u>Ppretorius@commissionsc.org.za</u>
And to: <u>ShannonV@commissionsc.org.za</u>

COMMISSIONS ACT NO. 8 OF 1947

[View Regulation]

[ASSENTED TO 1 APRIL, 1947] [DATE OF COMMENCEMENT: 18 APRIL, 1947]

(Afrikaans text signed by the Governor-General)

This Act has been updated to Government Gazette 17477 dated 4 October, 1996.

as amended by

General Law Amendment Act, No. 80 of 1964 [with effect from 24 June, 1964]

General Law Amendment Act, No. 102 of 1967 [with effect from 21 June, 1967]

General Law Amendment Act, No. 49 of 1996 [with effect from 4 October 1996]

ACT

To make provision for conferring certain powers on commissions appointed by the Governor-General for the purpose of investigating matters of public concern, and to provide for matters incidental thereto.

ARRANGEMENT OF SECTIONS

- Application of this Act with reference to commissions appointed by the Governor-General
- 2. Commission's sittings
- 3. Commission's powers as to witnesses
- 4. Sittings to be public
- 5. Hindering or obstructing a commission
- Offences by witnesses
- 6A.
- 7. Short title
- 1. Application of this Act with reference to commissions appointed by the Governor-General.—
- (1) Whenever the Governor-General has, before or after the commencement of this Act, appointed a commission (hereinafter referred to as a "commission") for the purpose of investigating a matter of public concern, he may by proclamation in the *Gazette*
 - (a) declare the provisions of this Act or any other law to be applicable with reference to such commission, subject to such modifications and exceptions as he may specify in such proclamation; and

 [Para. (a) inserted by s. 13 (a) of Act No. 80 of 1964.]
 - (b) make regulations with reference to such commission—
 - (i) conferring additional powers on the commission;
 - (ii) providing for the manner of holding or the procedure to be followed at the investigation or for the preservation of secrecy;
 - (iii) which he may deem necessary or expedient to prevent the commission or a member of the commission from being insulted, disparaged or belittled or to prevent the proceedings or findings of the commission from being prejudiced, influenced or anticipated;
 - (iv) providing generally for all matters which he considers it necessary or expedient to prescribe for the purposes of the investigation.
 - [Para. (b) inserted by s. 13 (a) of Act No. 80 of 1964 and substituted by s. 3 (a) of Act No. 102 of 1967.]
- (2) Any regulation made under paragraph (b) of subsection (1) may provide for penalties for any contravention thereof or failure to comply therewith, by way of—
 - (a) in the case of a regulation referred to in subparagraph (i), (ii) or (iv) of the said paragraph, a fine not

exceeding two hundred rand or imprisonment for a period not exceeding six months: $\begin{array}{c} JGZ-PROCO1/2020-APP-257 \end{array}$

(b) in the case of a regulation referred to in subparagraph (iii) of the said paragraph, a fine not exceeding one thousand rand or imprisonment for a period not exceeding one year.

[Sub-s. (2) added by s. 13 (b) of Act No. 80 of 1964 and substituted by s. 3 (b) of Act No. 102 of 1967.]

(3) Notwithstanding anything to the contrary in any other law contained, a magistrate's court shall have jurisdiction to impose any penalty prescribed by any such regulation.

[Sub-s. (3) added by s. 3 (b) of Act No. 102 of 1967.]

2. Commission's sittings.—A commission may sit at any place in the Union for the purpose of hearing evidence or addresses or of deliberating.

[S. 2 amended by s. 1 of Act No. 49 of 1996.]

3. Commission's powers as to witnesses.—(1) For the purpose of ascertaining any matter relating to the subject of its investigations, a commission shall in the Union have the powers which a Provincial Division of the Supreme Court of South Africa has within its province, 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.

[Sub-s. (1) amended by s. 1 of Act No. 49 of 1996.]

- (2) A summons for the attendance of a witness or for the production of any book, document or object before a commission shall be signed and issued by the secretary of the commission in a form prescribed by the chairman of the commission and shall be served in the same manner as a summons for the attendance of a witness at a criminal trial in a superior court at the place where the attendance or production is to take place.
- (3) If required to do so by the chairman of a commission a witness shall, before giving evidence, take an oath or make an affirmation, which oath or affirmation shall be administered by the chairman of the commission or such official of the commission as the chairman may designate.
- (4) Any person who has been summoned to attend any sitting of a commission as a witness or who has given evidence before a commission shall be entitled to the same witness fees from public funds, as if he had been summoned to attend or had given evidence at a criminal trial in a superior court held at the place of such sitting, and in connection with the giving of any evidence or the production of any book or document before a commission, the law relating to privilege as applicable to a witness giving evidence or summoned to produce a book or document in such a court, shall apply.
- **4. Sittings to be public.**—All the evidence and addresses heard by a commission shall be heard in public: Provided that the chairman of the commission may, in his discretion, exclude from the place where such evidence is to be given or such address is to be delivered any class of persons or all persons whose presence at the hearing of such evidence or address is, in his opinion not necessary or desirable.
- **5. Hindering or obstructing a commission.**—Any person who wilfully interrupts the proceedings of a commission or who wilfully hinders or obstructs a commission in the performance of its functions 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 to both such fine and imprisonment.
- **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 has been required by the chairman of the commission to do so or, having been sworn or having made affirmation, fails to answer fully and satisfactorily 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 has 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 to both such fine and imprisonment.
- (2) Any person who after having been sworn or having made affirmation, gives false evidence before a commission on any matter, knowing such evidence to be false or not knowing or believing it to be true, shall be guilty of an offence and liable on conviction to a fine not exceeding one hundred pounds or to imprisonment for a period not exceeding twelve months, or to both such fine and imprisonment.

6A.

[S. 6A inserted by Proclamation No. 149 of 29 August, 1980 and repealed by s. 1 of Act No. 49 of 1996.]

7. Short title.—This Act shall be called the Commissions Act, 1947.

PROCLAMATIONS • PROKLAMASIES

PROCLAMATION NO. 1 OF 2020

By the

President of the Republic of South Africa

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

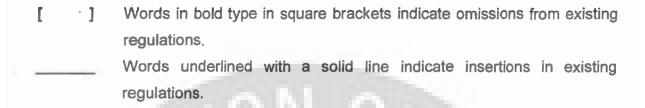
Under the powers vested in me by section 1 of the Commissions Act, 1947 (Act No.8 of 1947), I hereby, with effect from the date of publication of this Proclamation, amend the Regulations of the Commission of Inquiry into allegations of state capture, corruption and fraud in the public sector including organs of state published in the Government Gazette No. 41436 of 9 February 2018 as indicated in the Schedule attached hereto.

PRESIDENT

MINISTER OF THE CABINET

SCHEDULE

GENERAL EXPLANATORY NOTE:



Definition

1. In this Proclamation "Regulations" means the regulations of the Judicial Commission of Inquiry into allegations of State Capture, Corruption and Fraud in the Public Sector including Organs of State published in the Government Gazette No. 41436 of 9 February 2018.

Amendment of regulation 3 of the Regulations

- 2. Regulation 3 is amended by the insertion of the following regulation 3A after the said regulation:
- 3A The remuneration of any person designated by the Chairperson under regulation 3 must be determined in terms of applicable legislation, policies and prescripts relating to the work or service performed by such designated person.
- 3. Regulation 12 is hereby amended by the substitution for subregulation (2) for the following:
- "(2) Any person who -
 - [(a) contravenes regulation 9;
 - (b) willfully hinders, resists or obstructs the Chairperson or any officer in the exercise of any power contemplated in regulation 10;
 - (c) . contravenes regulation 9]
 - (a) appears before the Commission and refuses or fails, on any grounds other than those contemplated in section 3(4) of the Commissions Act.

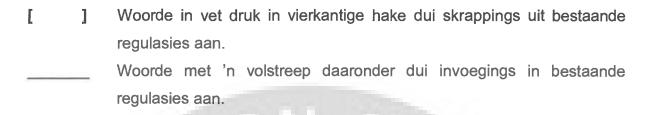
- 1947, to answer, or, to answer fully and satisfactorily, any question lawfully put to him or her;
- (b) contravenes regulation 9;
- (c) willfully hinders, resists or obstructs the Chairperson or any officer in the exercise of any power contemplated in regulation 10 (1) or (2)

is guilty of an offence and liable on conviction -

4. The amendments to the Regulations shall come into effect on the date of publication in the Government Gazette.

BYLAE

ALGEMENE VERDUIDELIKENDE NOTA:



Woordomskrywing

1. In hierdie Proklamasie beteken "Regulasies" die regulasies van die Geregtelike Kommissie van Ondersoek na bewerings van staatskaping, korrupsie en bedrog in die Openbare Sektor met inbegrip van Staatsorgane afgekondig in Staatskoerant No. 41436 van 9 Februarie 2018.

Wysiging van regulasie 3 van die Regulasies

- 2. Regulasie 3 word gewysig deur die volgende regulasies na die gemelde regulasie in te voeg:
- "3A lemand ingevolge regulasie 3 deur die Voorsitter aangewys, is geregtig op gepaste vergoeding of gelde, ooreenkomstig enige toepaslike wetgewing, regulasie of voorgeskrewe tarief, vir bystand in die verrigting van die Kommissie se werksaamhede aan die Kommissie gelewer.
- Indien 'n persoon kragtens regulasie 3 deur die Voorsitter aangewys 'n afgetrede regter is, moet die Voorsitter die Minister nader om te versoek dat die afgetrede regter 'n diens ingevolge paragraaf (d) van die omskrywing van "diens" in die Wet op Besoldiging en Diensvoorwaardes van Regters, 2001 (Wet No. 47 van 2001), lewer deur bystand aan die Kommissie te verskaf soos in die Voorsitter se aanwysing beoog.
- Indien 'n persoon deur die Voorsitter aangewys 'n regspraktisyn is, kan sy of haar dienste deur die Staatsprokureur verkry word.".

Wysiging van regulasie 12 van die Regulasies

- **3.** Regulasie 12 word hierby gewysig deur subregulasie (2) deur die volgende subregulasie te vervang:
- "(2) Enige persoon wat-
 - "[(a) opsetlik die Voorsitter, enige lid of enige beampte in die uitvoering van enige bevoegdheid beoog in regulasie 9, belemmer;
 - (b) 'n bepaling van regulasie 13, 14, 15, of 16 oortree; of
 - (c) 'n bepaling van regulasie 17 oortree]
 - (a) voor die Kommissie verskyn en weier of versuim, op enige gronde behalwe die gronde in artikel 3(4) van die Kommissiewet, 1947, beoog, om enige vraag wat wettig aan hom of haar gestel is, te beantwoord, of ten volle en bevredigend te beantwoord;
 - (b) regulasie 9 oortree;
 - (c) die Voorsitter of enige beampte opsetlik hinder, teenstaan of dwarsboom in die uitvoering van enige bevoegdheid in regulasie 10(1) of (2) beoog;
 - (d) weier of versuim, sonder genoegsame rede, om binne 'n tydperk deur die Voorsitter gegee of enigsins, 'n beëdigde verklaring of bevestiging in navolging van 'n lasgewing kragtens regulasie 10(6) deur die Voorsitter gegee, in te dien; of
 - (e) 'n bepaling van regulasie 11 oortree,

is skuldig aan 'n misdryf en by skuldigbevinding strafbaar met-

- (i) in die geval van 'n misdryf in (a), (c), (d) of (e) bedoel, met 'n boete of met gevangenisstraf vir 'n tydperk van hoogstens 12 maande;
- (ii) <u>in die geval van 'n misdryf in (b) bedoel, met 'n boete, of met</u> gevangenisstraf vir 'n tydperk van hoogstens ses maande.

Inwerkingtreding

4. Die wysigings aan die Regulasies word op die datum van afkondiging in die Staatskoerant. van krag.

PROCLAMATIONS • PROKLAMASIES

PROCLAMATION NO. 3 OF 2018

by the

President of the Republic of South Africa

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

In terms of section 84(2)(f) of the Constitution of the Republic of South Africa of 1996, I hereby appoint a Commission of Inquiry to investigate allegations of state capture, corruption and fraud in the Public Sector including organs of state with the terms of reference in the Schedule attached hereto and appoint Honourable Mr Justice Raymond Mnyamezeli Mlungisi Zondo, Deputy Chief Justice of the Republic of South Africa, as its Chairperson.

on this the 23rd day of January Two Thousand and Eighteen.

President

By Order of the President-in-Cabinet:

Minister of the Cabinet

SCHEDULE

TERMS OF REFERENCE

OF THE

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

A Judicial Commission of Inquiry ("the Commission") is hereby appointed in terms of Section 84(2)(f) of the Constitution of the Republic of South Africa, 1996. The Commission is appointed to investigate matters of public and national interest concerning allegations of state capture, corruption, and fraud.

- 1. The Commission shall inquire into, make findings, report on and make recommendations concerning the following, guided by the Public Protector's state of capture report, the Constitution, relevant legislation, policies, and guidelines, as well as the order of the North Gauteng High Court of 14 December 2017 under case number 91139/2016: -
 - 1.1. whether, and to what extent and by whom attempts were made through any form of inducement or for any gain of whatsoever nature to influence members of the National Executive (including Deputy Ministers), office bearers and/or functionaries employed by or office bearers of any state institution or organ of state or directors of the boards of SOE's. In particular,

the commission must investigate the veracity of allegations that former Deputy Minister of Finance, Mr Mcebisi Jonas and Ms Mentor were offered Cabinet positions by the Gupta family;

- 1.2. whether the President had any role in the alleged offers of Cabinet positions to Mr Mcebisi Jonas and Ms Mentor by the Gupta family as alleged;
- 1.3. whether the appointment of any member of the National Executive, functionary and /or office bearer was disclosed to the Gupta family or any other unauthorised person before such appointments were formally made and/or announced, and if so,

whether the President or any member of the National Executive is responsible for such conduct;

members of his National Executive (including Deputy Ministers) or public official or employee of any state owned entities (SOEs) breached or violated the Constitution or any relevant ethical code or legislation by facilitating the unlawful awarding of tenders by SOE's or any organ of state to benefit the Gupta family or any other family, individual or corporate entity doing business with government or any organ of state;

- 1.5. the nature and extent of corruption, if any, in the awarding of contracts, tenders to companies, business entities or organizations by public entities listed under Schedule 2 of the Public Finance Management Act No. 1 of 1999 as amended.
- 1.6. whether there were any irregularities, undue enrichment, corruption and undue influence in the awarding of contracts, mining licenses, government advertising in the New Age Newspaper and any other governmental services in the business dealings of the Gupta family with government departments and SOE's;
- 1.7. whether any member of the National Executive and including Deputy Ministers, unlawfully or corruptly or improperly intervened in the matter of the closing of banking facilities for Gupta owned companies;
- 1.8. whether any advisers in the Ministry of Finance were appointed without proper procedures. In particular, and as alleged in the complaint to the Public Protector, whether two senior advisers who were appointed by Minister Des Van Rooyen to the National Treasury were so appointed without following proper procedures;
- 1.9. the nature and extent of corruption, if any, in the awarding of contracts and tenders to companies, business entities or organizations by Government Departments, agencies and entities. In

particular, whether any member of the National Executive (including the President), public official, functionary of any organ of state influenced the awarding of tenders to benefit themselves, their families or entities in which they held a personal interest;

- These Terms of Reference may be added to, varied or amended from time to time.
- All organs of State will be required to cooperate fully with the Commission.
- 4. The Commissions Act, 1947 (Act No. 8 of 1947) shall apply to the Commission, subject to such amendments and exemptions as may be specified by proclamation from time to time.
- 5. The Commission shall submit its report and recommendations to the President within 180 days of the commencement of the Commission.
- 6. Regulations shall be made, after consultations with the presiding judge, in terms of the Commissions Act, 1947 and shall apply to the Commission in order to enable the Commission to conduct its work meaningfully and effectively and to facilitate the gathering of evidence by conferring on the Commission powers as necessary, including the power to enter and search premises, secure the attendance of witnesses and compel the production of documents.
- The Commission shall where appropriate, refer any matter for prosecution,
 further investigation or the convening of a separate enquiry to the appropriate

law enforcement agency, government department or regulator regarding the conduct of a certain person/s.

 Regulations contemplated above shall also make provision for the resourcing and employment of staff of the Commission.

PROKLAMASIE NO. 3 VAN 2018

deur die

President van die Republiek van Suid-Afrika

GEREGTERLIKE KOMMISSIE VAN ONDERSOEK TEN EINDE ONDERSOEK NA BEWERINGS VAN STAATSKAPING, KORRUPSIE EN BEDROG IN DIE OPENBARE SEKTOR MET INBEGRIP VAN STAATSORGANE, IN TE STEL

Ingevolve artikel 84(2)(f) van die Grondwet van die Republiek van SuidAfrika, 1996 stel ek hierby 'n Kommissie van Ondersoek aan ten einde
ondersoek in te stel na bewerings van staatskaping, korrupsie en bedrog in
die Openbare Sektor, met inbegrip van staatsorgane, met die opdrag in die
Bylae en stel ek hierby die Agbare Regter Raymon Mnyamezeli Mlungisi
Zondo as Voorsitter, aan.

Gegee onder my Hand en die Seël van die Republiek van Suid-Afrika te Pretoria op hierdie 23ste dag van Januarie 2018.

President

By Las van die President-in-Kabinet:

Minister van die Kabinet

BYLAE

OPDRAG VAN DIE

GEREGTERLIKE KOMMISSIE VAN ONDERSOEK TEN EINDE ONDERSOEK NA
BEWERINGS VAN STAATSKAPING, KORRUPSIE EN BEDROG IN DIE
OPENBARE SEKTOR, MET INBGERIP VAN STAATSORGANE, IN TE STEL

'n Geregterlike Kommissie van Ondersoek ("die Kommissie") word hierby ingevolge artikel 84(2)(f) van die Grondwet van die Republiek van Suid-Afrika, 1996, aangestel. Die Kommissie word aangestel ten einde aangeleenthede van openbare en nasionale belang met betrekking tot bewerings van staatskaping, korrupsie en bedrog, te ondersoek.

- Die Kommissie moet ondersoek instel na, bevindings maak, verslag doen oor en aanbevelings maak met betrekking tot die volgende, met inagneming van die Openbare Beskermer se verslag oor staatskaping, die Grondwet, toepaslike wetgewing, beleid en riglyne, sowel as die bevel van die Noord-Gauteng Hoë Hof van 14 Desember 2017 onder Saak Nr. 91139/2016:
 - of, en die mate waartoe en deur wie, pogings aangewend was deur enige vorm van aansporing of vir enige voordeel van watter aard ookal, om lede van die Nasionale Uitvoerende Gesag (met inbegrip van Adjunk-ministers), ampsdraers en/of funksionarisse wat in diens is, of enige ampsdraers van enige staatsentiteit of staatsorgaan of direkteure van die rade van Staatsbeheerde Ondernemings, te beïnvloed. Die

Kommissie moet in besonder die geloofwaardigheid van bewerings ondersoek dat voormalige Adjunk-minister van Finansies, mnr Mcebisi Jonas, en me Mentor Kabinetsposisies deur die Gupta-familie aangebied was;

- 1.2 of die President enige rol gespeel het in die beweerde aanbod van Kabinetsposisies aan mnr Mcebisi Jonas en me Mentor deur die Gupta-familie, soos beweer;
- 1.3 of die aanstelling van enige lid van die Nasionale Uitvoerende Gesag, funksionaris en/of ampsdraer aan die Gupta-familie of aan enige ander ongemagtigde persoon geopenbaar is voordat sodanige aanstellings formeel gemaak of bekendgemaak is, en indien wel,

of die President of enige ander lid van die Nasionale Uitvoerende Gesag vir sodanige gedrag verantwoordelik is;

1.4 of die President of enige lid van die huidige or voormalige lede van sy Nasionale Uitvoerende Gesag (met inbegrip van Adjunk-ministers) of enige openbare beampte of werknemer van enige Staatsbeheerde Ondernemings die Grondwet of enige toepaslike gedragskode of wetgewing oortree of geskend het deur die onwettige toekenning van tenders deur Staatsbeheerde Ondernemings of enige staatsorgaan te fasiliteer, tot voordeel van die Gupta-familie of enige ander familie,

individu of korporatiewe entiteit wat besigheid met die regering of enige staatsorgaan, doen;

- die aard en omvang van korrupsie, indien enige, in die toekenning van kontrakte, en tenders aan maatskappye, besigheidsentiteite of organisasies deur openbare entiteite wat kragtens Bylae 2 van die Wet op Openbare Finansiële Bestuur, 1999 (Wet No. 1 van 1999), soos gewysig, gelys is.
- 1.6 of daar enige onreëlmatighede, onbehoorlike verryking, korrupsie of onbehoorlike beïnvloeding was by die toekenning van kontrakte, mynlisensies, regeringsadvertering in die New Age koerant en enige ander regeringsdienste in die besigheidshandelinge van die Guptafamilie met Staatsdepartemente en Staatsbeheerde Ondernemings;
- 1.7 of enige lid van die Nasionale Uitvoerende Gesag, met inbegrip van Adjunk-ministers, onwettiglik of op 'n korrupte of onbehoorlike wyse in die sluiting van die bankgeriewe vir Gupta maatskappye, ingegryp het;
- 1.8 of enige adviseurs in die Ministerie van Finansies sonder die nakoming van behoorlike prosedures aangestel is, en in besonder of, en soos beweer in die klagte aan die Openbare Beskermer, twee senior adviseurs wat deur Minister Des van Rooyen .by die Nasionale Tesourie aangestel is, aldus sonder die nakoming van behoorlike prosedures aangestel is;

- die aard en omvang van korrupsie, indien enige, by die toekenning van kontrakte en tenders aan maatskappye, besigheidsentiteite of organisasies deur Staatsdepartemente, agentskappe en entiteite, en in besonder of enige lid van die Nasionale Uitvoerende Gesag (met inbegrip van die President), openbare beampte, funksionaris of enige staatsorgaan die toekenning van tenders beïnvloed het ten einde hulself, hulle families of entiteite waarby hulle 'n persoonlike belang gehad het, te bevoordeel;
- Hierdie Opdrag kan, van tyd tot tyd, aangevul, verander of gewysig word.
- 3. Alle Staatsorgane moet ten volle met die Kommissie saamwerk.
- Die Kommissiewet, 1947 (Wet No. 8 van 1947) is op die Kommissie van toepassing, behoudens sodanige wysigings en vrystellings as wat, van tyd tot tyd, deur proklamasie gespesifiseer mag word.
- Die Kommissie moet sy verslag en aanbevelings binne 180 dae vanaf die aanvang die Kommissie, aan die President voorlê.
- 6. Regulasies moet, na oorleg met die voorsittende regter, ingevolge die Kommissiewet, 1947 gemaak word, wat op die Kommissie van toepassing is, ten einde die Kommissie in staat te stel om sy werk behoorlik en effektief te kan doen en om die insamel van getuienis te vergemaklik deur om op die Kommissie die bevoegdhede op te lê as wat nodig mag wees, met inbegrip

van die bevoegdheid om persele te betree en deursoek, die bywoning van getuies te verseker en die voorlegging van dokumente te vereis.

- 7. Die Kommissie moet, waar toepaslik, enige aangeleentheid vir vervolging, verdere ondersoek of vir die byeenroeping van 'n afsonderlike ondersoek, verwys, na die toepaslike wetstoepassingsagenskap, Staatsdepartement of reguleerder met betrekking tot die gedrag van 'n sekere persoon of persone.
- 8. Bogemelde regulasies moet ook vir hulpmiddele en die indiensneming van personeel van die Kommissie voorsiening maak.