

THE RE-OPENED INQUEST INTO THE DEATH OF DR NEIL HUDSON AGGETT:**LIST OF F EXHIBITS – INVESTIGATING OFFICER**

| Exhibit | Description |
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| FGK1(1) | Newspaper articles |
| FGK 1(2) | Documents from Bell, Dewar and Hall |
| FGK 1(3) | Supplementary argument -Aggett family |
| FGK 1(4) | Third supplementary report by Bell, Dewar and Hall |
| FGK 1(5) | Confidential correspondence - Bell, Dewar and H, dated all 4 October 1982 |
| FGK 1(6) | Correspondence Bell, Dewar and Hall, dated 31 March 1983 |
| FGK 1(7) | Correspondence Raymond Tucker, dated 24 May 1982 |
| FGK 1(8) | Affidavit of Auret Van Heerden, dated 20 September 1982 |
| FGK 1(9) | Documentation from Supreme Court, Case no: 6533/82 |
| FGK 1(10) | Heads of Argument in 139\82 |
| FGK 1(11) | Affidavit of Paj Kotze |
| FGK 2(10) | Calendar 1982 |
| FGK 2(2) | Telephone list of police officials WLD |
| FGK 2(3) | Security File Dr N H Aggett |
| FGK 2(4) | Human Rights Violation Protocol |
| FGK 2(5) | Dipale EM file |
| FGK 2(6) | Other |
| FGK 3 | Letter Colonel Edwards |

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| FGK 4 | Letter Heidi Venter |
| FGK 5 | Department of Justice: Destruction Policy, dated 13 June 1986 |
| FGK 6 | Consolidated list regarding Exhibits A to E |
| FGK 7(1) | Photograph of Dr Aggett |
| FGK 7(2) | Photograph of Dr Aggett |
| FGK 7(3) | Photograph of Dr Aggett |
| FGK 7(4) | Photograph of Dr Aggett |
| FGK 8(1) | Inquests Act 58 of 1959 |
| FGK 8(2) | The suppression of Communism Act, 44 of 1950 |
| FGK 8(3) | The General Law Amendment Act, 37 of 1963 |
| FGK 8(4) | The Terrorism Act, 83 of 1967 |
| FGK 8(5) | The General Law Amendment Act, 76 of 1962 |
| FGK 8(6) | The Internal Security Act, 79 of 1976 |
| FGK 8(7) | The Promotion of National Unity and Reconciliation Act, 34 of 1995 |
| FGK 9 | Photo Album CST Mothupi, LCRC |
| FGK 10 | Plans JVS |
| FGK 11(1) | No one to Blame by George Bizos |
| FGK 11(2) | Detention and Torture in South African by Don Foster |
| FGK 11(3) | Newspaper articles |
| FGK 11(4) | Political Imprisonment in SA |
| FGK 12(1) | Death certificate of James Agenbang |
| FGK 12(2) | Death certificate of Mosoeu Paule Sehloho |

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| FGK 12(3) | Death certificate of Stephen Peter Whitehead |
| FGK 12(4) | Death certificate of Michael Christoffel Joubert |
| FGK 12(5) | Death certificate of Andries Abraham Struwig |
| FGK 12(6) | Death certificate of Daniel Dennis Mahoney |
| FGK 12(7) | Death certificate of Theunis Jacobus Swanepoel |
| FGK 12(8) | Death certificate of Christiaan Stephanus Scholtz |
| FGK 12(9) | Death certificate of Johannes Stephan Us Marais |
| FGK 12(10) | Death certificate of Daniel Gert Oosthuizen |
| FGK 12(11) | Death certificate of Johannes J Acobus Steyn |
| FGK 12(12) | Death certificate of Andre Martin |
| FGK 12(13) | Death certificate of Arthur Benoni Cronwright |
| FGK 13 | Letter to legal services, dated 16 September 2019 |
| FGK 13(1) | Police File: MP Sehloho |
| FGK 13(2) | Police File: MS Joubert |
| FGK 13(3) | Police File: MC Joubert |
| FGK 13(4) | Police File: CH Van Der Merwe |
| FGK 13(5) | Police File: MG Makhetha |
| FGK 13(6) | Police File: NJ Deetlefs |
| FGK 13(7) | Police File: MJ Naude |
| FGK 13(8) | Police File: J Agengab |
| FGK 14 | Receipt: Capt Nel, January 2019 |
| FGK 14(1) | Detainee File: Firoz Cahcalia |

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| FGK 14(2) | Detainee File: Frank Chikane |
| FGK 14(3) | Detainee File: Keith Coleman |
| FGK 14(4) | Detainee File: Ernest Dipale |
| FGK 14(5) | Detainee File: Alan Fine |
| FGK 14(6) | Detainee File: Elizabeth Catherine Floyd |
| FGK 14(7) | Detainee File: Babara Hogan |
| FGK 14(8) | Detainee File: Thabo Samson Lerumo |
| FGK 14(9) | Detainee File: Eric Mntonga |
| FGK 14(10) | Detainee File: Ismail Momoniat |
| FGK 14(11) | Detainee File: Pramanathan Naidoo |
| FGK 14(12) | Detainee File: Shirish Nanabhai |
| FGK 14(13) | Detainee File: Gabriel Jabulani Ngwenya |
| FGK 14(14) | Detainee File: Sisa Njikelana |
| FGK 14(15) | Detainee File: Maurice Peter Smithers |
| FGK 14(16) | Detainee File: Auret Van Heerden |
| FGK 14(17) | Detainee File: Neil Hudson Aggett |
| FGK 15 | Photograph of Kikoi from Paul Erasmus |
| FGK 16 | List of detainees who died in detention |
| FGK 17 | TRC amnesty applications / rep |
| FGK 17(1) | Roelof Jacobus Venter |
| FGK 17(2) | Wikus Johannes Loots and 8 Others |
| FGK 17(3) | Paul Francis Erasmus and 3 Others |

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| FGK 17(4) | Paul Francis Erasmus |
| FGK 17(5) | William Charles Cecil Smith |
| FGK 17(6) | Elizabeth Floyd |
| FGK 17(7) | Dr Coleman |
| FGK 17(8) | The Judiciary |
| FGK 17(9) | Charles Alfred Zeelie |

LIST OF G EXHIBITS - AGGETT FAMILY EXHIBITS

| Exhibit | Description |
|--------------|--|
| G1 | Affidavit of George Bizos, signed 16 October 2018 |
| G2 | Affidavit of Jill Burger, signed 20 January 2020 |
| G3 | Affidavit of David Dison, signed 21 January 2020 |
| G4 | Affidavit of Liz Floyd, signed 22 January 2020 |
| G5 | Affidavit of Joe Nyampule, signed 16 August 2018 |
| G6 | Affidavit of Mohane Gerden Makhetha, signed 9 July 2018 |
| G7 | Affidavit of Firoz Cachalia, signed 14 July 2018 |
| G8 | Affidavit of Parmananthan Naidoo, signed 26 July 2018 |
| G9 | Affidavit of Maurice Smithers, signed 15 July 2018 |
| G10 | Photographs of John Vorster Square cells and staircases and floor plan of floor 2 of John Vorster Square |
| G11.1 | English Translation of 1978 SAP circular regarding treatment of detainees in terms of security legislation |
| G11.2 | Original of 1978 SAP circular regarding treatment of detainees in terms of security legislation |
| G12 | Calendar of 1981 and 1982 |
| G13 | Affidavit of Barbara Hogan, signed 28 January 2020 |
| G14 | Affidavit of Frank Chikane, signed 29 January 2020 |
| | G15. Exhibits on Rooi Rus Swanepoel |
| G15.1 | Judgment by Mothle J in the matter of the re-opened inquest into the death of Ahmed Essop Timol |

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| G15.2 | Pages 194 to 196 (Volume 2) of the Truth and Reconciliation Commission of South Africa (" TRC ") Report |
| G15.3 | Pages 540 to 542 (Volume 3) of the TRC Report |
| G15.4 | Pages 568 to 571 (Volume 3) of the TRC Report |
| G15.5 | Pages 137 to 142 of JZ Van Niekerk Police file in the re-opened inquest into the death of Ahmed Essop Timol |
| G15.6 | Page 687 (volume 9) of the transcript of the re-opened inquest into the death of Ahmed Essop Timol |
| G15.7 | Page 1052 (volume 15) of the transcript of the re-opened inquest into the death of Ahmed Essop Timol |
| G16 | Supplementary affidavit of Parmananthan Naidoo, signed 30 January 2020 |
| G17 | Affidavit of Ismail Momoniat, signed 10 June 1982 |
| G18 | Affidavit of Ismail Momoniat, signed 2 February 2020 |
| G19 | Section 22 from the General Law Amendment Act, 1966 |
| G20 | Affidavit of Sisa Njikelana, signed 3 February 2020 |
| G21 | Independent Medico-legal Report by Dr Steve R Naidoo, dated 4 February 2020 |
| G22 | Affidavit of Ronald Kasrils, signed 22 January 2020 |
| G23 | Affidavit of Jabulane Ngwenya, signed 4 February 2020 |
| G23.1 - G23.3 | Pictures of windows and corridors on the second floor of John Vorster Square |
| G24 | LCRC Photobook of inspection in loco on 21 January 2020 |
| G25 | Missing documents from the Gluckman Archive |
| G26 | Judgment in Essop v The Commission of the South African Police, case no M1804/71 |

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| G27 | Affidavit of Keith Coleman, signed 9 February 2020 |
| G28 | Affidavit of Keith Coleman, signed 10 June 1982 |
| G29 | Affidavit of Paul Erasmus, signed 11 February 2020 |
| G30 | Transcript of the testimony of William Charles Cecil Smith, application AM5469/97 at the Truth and Reconciliation Commission |
| G31.1 | Photograph bundle of Security Branch Members, taken outside of Auret Van Heerden's damages claim hearing |
| G31.2 | Key to photograph bundle of Security Branch Members, labelled by Paul Erasmus |
| G32.1 | Powerpoint Presentation by Savage & Dodd Architects on John Vorster Square |
| G32.2 | Architectural drawings of John Vorster Square 1 |
| G32.3 | Architectural drawings of John Vorster Square 2 |
| G32.4 | Architectural drawings of John Vorster Square 3 |
| G32.5 | Curriculum Vitae of Colin Savage |
| G33.1 | Report by Sietze Albertse |
| G33.2 | Curriculum Vitae of Sietze Albertse |
| G34 | Affidavit of Gavin Andersson, signed 12 February 2020 |
| G35 | Affidavit of Jan Theron, signed 17 February 2020 |
| G36 | Handwritten unsigned statement / notes by Deetlefs given to Torie Pretorius in 2018 |
| G37 | Government notice on the suppression of communism |
| G38 | History online extract on Oscar Mpetha |
| G39 | Programme for Inspection in loco that took place on 21 January 2020 |

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| | (For court use only - not to be distributed to the media) |
| G40 | Page from Deetlefs personnel file missing from FGK13(6) |
| G41 | Affidavit of Jonathan Joffe, signed 15 February 2020 |
| G42 | Affidavit of Beverley Naidoo, signed 13 February 2020 |
| G43 | Affidavit of Richard Wragg, signed 19 February 2020 |
| G44 | Supplementary affidavit of David Dison, signed 26 May 2020 |
| G45 | Supplementary Independent Medico-legal Report by Dr Steve R Naidoo, dated 23 March 2020 |
| G46 | Supplementary affidavit of Firoz Cachalia, dated 20 November 2020 |
| G47 | Second supplementary affidavit of Parmananthan Naidoo, dated 5 January 2021 |
| G48 | Affidavit of Parmananthan Naidoo, dated 18 June 1982 |
| G49 | TRC decision AC/2001/119 |
| G50 | TRC decision AC/2001/228 |
| G51 | TRC Final Report, Volume 5, Chapter 6, Subsection 77 – 83: Finding of "realm of criminality" |
| G52 | TRC Special Hearing on Armed Forces – Johan Velde van der Merwe (quote highlighted on page 5) |
| G53 | Amnesty Committee Hearing – Stanza Bopape (Johan Velde van der Merwe quote highlighted at page 90) |
| G54 | Application AM3767/96 – Transcript of amnesty Hearing of Eugene Fourie regarding the burning of a safe house near Oshoek Border Post (Thami Zulu matter) (Highlighted at page 1 and page 2) |
| G55 | TRC Decision AC2000/089 – Decision relating to Conspiracy and Murder of the Chand family (Highlighted at page 3) |

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| G56 | Application AM5001/97 – Transcript of amnesty hearing of Christo Petro Deetlefs regarding the De Kock 6 - Abduction of Glory Sedibe (Highlighted at page 14 and 15) |
| G57 | TRC Decision AC/2001/094 – Decision relating to the abduction of Glory Sedibe |
| G58 | TRC Final Report, Volume 2, Pages 1 to 3; 275 to 289; 313 to 317 (Highlighted at Page 275 para 457; Page 278 para 468, 469; Page 281, Page 287 para 509; para 479, 481; Page 317, paras 17 – 19) |
| G59 | Transcript of Eugene Fourie in relation to amnesty application for De Kock 6 – Various incidents (highlighted at Page 3, Page 10, Page 11) |
| G60 | The interaction between the work of the human rights violations committee and the amnesty committee: the former South African Government & its Security Forces, Vol 6, Sec 3, Chapt 1, Pages 194 – 195 (Highlighted at para 60) |
| G61 | Personnel file of Aletta Gertruda (Visser) (previously Blom) as received from SAPS |
| G62.1 | Handwritten statement of Jabulane Ngwenya to Sergeant Blom, dated 14 June 1982 (from missing B2 folder in 1982 Record – sourced from sussex) |
| G62.2 | Typed statement of Jabulane Ngwenya to Sergeant Blom, dated 14 June 1982 (from missing B2 folder in 1982 Record – sourced from sussex) |
| G63 | Personnel file of Joseph Petrus Woensdregt as received from SAPS |
| G64 | Table of deaths in Security Branch detention during Apartheid Era |
| G65 | Document detailing amnesty decisions linked to the Soweto Security Branch according to the TRC Records |
| G66 | Pleadings in Auret Van Heeden V Cronwright & 9 others |
| G67 | Van Heerden v Cronwright & 9 others 1985 (2) SA 342 (T): Granting of leave to appeal |
| G68 | Christopher Merritt, "Detention without trial in South Africa: The abuse of human rights as state strategy in the late 1980s" (updated version of an article which appeared in Africa Today 37(2) 1990, pp. 53-66) |

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| G69 | Ergun Cakal, "Befogging reason, undermining will: Understanding sleep deprivation as torture and other ill-treatment in international law" in TORTURE Volume 29, Number 2 (2019) |
| G70 | Roelof Venter's application for amnesty to the TRC |
| G71 | SAPA press statement from 27 October 1996 "Former Vlakplaas Operative Reveal Secret Unit" |
| G72.1 | Report by Thivash Moodley from TMI Dynamics, dated 14 May 2018 |
| G72.2 | Confirmatory affidavit of Thivash Moodley, dated 9 February 2021 |
| G73 | Supplementary affidavit of Jabulane Ngwenya, dated 9 February 2021 |
| G74 | Pau Pérez-Sales, "Drawing the fine line between interrogation and torture: towards a Universal Protocol on Investigative Interviewing" in TORTURE Volume 27, Number 2 (2017) |
| G75 | Affidavit of Frank Kennan Dutton, dated 10 February 2021 |

LIST OF H EXHIBITS – SAPS EXHIBITS

| Exhibit | Description |
|----------------|---|
| H1 | Affidavit of Eleanor Groenewald, signed February 2020 |
| H2 | Photographs of Cell B10 |

LIST OF J EXHIBITS – NATIONAL PROSECUTING AUTHORITY EXHIBITS

| Exhibit | Description |
|---------|---|
| J1 | Affidavit of Carl Niehaus, signed 11 February 2020 |
| J2 | Affidavit of Haroon Aziz, signed 12 February 2020 |
| J3 | Affidavit of Elizabeth Rosalia Abrahams, dated 11 February 2020 |
| J4 | Affidavit of Benjamin Nel, dated 17 February 2020 |
| J5 | Unabridged death certificate of Stephen Whitehead |
| J6 | Supplementary affidavit of Jan Theron, dated 10 February 2021 |

LIST OF K EXHIBITS – FORMER SECURITY BRANCH POLICE OFFICER EXHIBITS

| Exhibit | Description |
|---------|--|
| K1 | Affidavit of Nicolaas Johannes Deetlefs, signed 17 February 2020 |
| K2 | Affidavit of Roelof Jacobus Venter, signed 11 February 2020 |
| K3 | Case books of Nicolaas Johannes Deetlefs |

LIST OF L EXHIBITS – FORMER SECURITY BRANCH POLICE OFFICER EXHIBITS

| Exhibit | Description |
|----------------|--|
| L1 | Affidavit of Joseph Petrus Woensdregt, dated 22 January 2021 |
| L2 | Affidavit of Joseph Petrus Woensdregt, dated 26 March 1982 |
| L3 | Personnel file of Johannes Nicolaas Visser |