

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

Exhibit	Description
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

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

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 Agenbag
FGK 14	Receipt: Capt Nel, January 2019
FGK 14(1)	Detainee File: Firoz Cachalia

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

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 Mothele J in the matter of the re-opened inquest into the death of Ahmed Essop Timol

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

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

	(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)

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)

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