



06 November 2022

Webber Wentzel

Per email: [odette.geldenhuis@webberwentzel.com](mailto:odette.geldenhuis@webberwentzel.com)

Reference: TMI19\_R1408V3\_IAHaron

Dear Mrs Odette Geldenhuis

**Technical Assessment by Thivash Moodley of Imam Abdullah Haron's alleged fall down a flight of stairs**

TMI Dynamics received a request in May 2019 to provide a technical assessment of the late Imam Abdullah Haron's (**Haron**) alleged fall down a flight of stairs.

On 26 July 2019 I conducted an inspection of a staircase at Central Cape Town Police Station (formerly Caledon Police Station). This was the staircase that the Security Branch alleged that Haron had fallen down during the night of 19 September 1969, which according to them, caused the injuries detected in the Post Mortem report. I carried out measurements at the scene and took photographs.

I submitted a preliminary report to Webber Wentzel in 2019. Since then, I have undertaken further research, and this final report is informed by such further research.

I am an aeronautical engineer, with 22 years' experience in aeronautical and mechanical engineering projects in the aerospace, defence, maritime, logistics and industrial sectors have used the information provided by the legal team from Webber Wentzel and desk research into fatal falls down stairs to perform the technical assessment of the alleged fall. My CV is attached to this report.

Since 2017, the firm, TMI Dynamics, has been tasked to work on the following persons' deaths whilst in the custody of the South African Police.

1. The alleged jumping of Mr A Timol from the 10<sup>th</sup> floor of the south side of John Vorster Square police station;
2. The alleged suicide by hanging of Dr HM Haffejee whilst in a holding cell at the Brighton Beach police station;
3. The alleged suicide of Dr Neil Aggett whilst in custody at the John Vorster Square police station;
4. The alleged fall of Mr Matthew Mabelane from the 10<sup>th</sup> floor of north side of the John Vorster Square police station.

The following documents were received from Webber Wentzel and were used as inputs to the technical assessment:

1. Webber Wentzel Brief, Reference O Geldenhuys / K Williams 3032726, Date 23 May 2019;
2. Inquest No. 50/70: Deceased Abdullah Haron, held at Cape Town in the district of the Cape, 18 February 1970, the English translation (**Inquest Report**).

It is important to inform Webber Wentzel, that even though the entire Inquest Report was provided and reviewed, the following extracts from the inquest report were specifically used to compile this technical assessment report:

1. Translated statements of Major Genis<sup>1</sup> in the Inquest Report in relation to what occurred at Caledon Police Station on 19 September 1969.

Genis: Myself, Detective-Sergeant van Wyk and the deceased came out my office, we walked down the passage to a wire gate leading to the ground floor, separating the stairs of the other building. When I got to the gate I unlocked it, I walked through and started walking down the stairs. The deceased stayed behind with Detective-Sergeant van Wyk. Van Wyk should have closed the lock. The stairs consist of three parts, three levels I should say, and when I was practically at the bottom of the stairs, as I already said, I heard a splashing sound. Since it is a dark place I could not see what was happening there, and the deceased slid down the last few stairs. I helped him there. The corridor at the bottom of the stairs was badly lit. Right opposite was a switch I wanted to turn on but I did not have the time for that. That was why I went downstairs, I led the way, to illuminate the passage. (page 17, line 2 to line 18)

Cooper questions (Question): You say you saw the deceased slip on the stairs? (page 17, line 19)

Genis: Slip on the last stairs in the passage,. (page 17, line 21)

Question: How did he slip, was it on his backside, as we say? (page 17, line 22 to line 23)

Genis: At that point I first saw his feet, so he was obviously sitting on his bottom. (page 17, line 24 to line 25)

Question: Did the deceased get up himself? (page 18, line 01)

Genis: He was busy getting up and I assisted him (page 18, line 02)

Question: But when he got up, did you immediately ask him if something was wrong? (page 18, line 03 to line 04)

Genis: Yes, I asked him: "What happened? Were you hurt?", Then he said, no, he was not hurt, he just got a fright. (page 18, line to line 6)

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<sup>1</sup> Inquest Report, page 17, line 3 to page 18, line 25

Question: Where was sergeant van Wyk at this stage? (page 18, line 7)

Genis: While I was helping the accused, van Wyk came down the stairs, I heard him come down. I actually could not see him; I could only see his silhouette. (page 18, line 8 to line 10)

Question: Did van Wyk say anything to the deceased or to you? (page 18, line 11 to line 12)

Genis: Did van Wyk say something? (page 18, line 13)

Question: Yes? (page 18, line 14)

Genis: No. (page 18, line 15)

Question: In other words, what you say when the deceased slipped down the stairs on his backside? (page 18, line 16 to line 17)

Genis: Yes. (page 18, line 18)

Question: You observed no external injuries? (page 18, line 19)

Genis: Nothing. (page 18, line 20)

Question: Nothing? (page 18, line 21)

Genis: Nothing. (page 18, line 22)

Question: And the deceased also did not complain about any injuries he sustained? (page 18, line 23 to line 24)

Genis: No. (page 18, line 25)

2. Translated statements of Sergeant JPF van Wyk<sup>2</sup> in the Inquest Report in relation to what occurred at the Caledon Police Station on 19 September 1969:

Cooper: Now describe now, you said you were done talking, or at least the interrogation was finished and it was 9 pm. (page 108, line 14 to line 16)

Van Wyk: Yes. (page 108, line 17)

Cooper: And you, major Genis and the deceased were together and you walked to the stairs. (page 108, line 18 to line 19)

Van Wyk: Yes. (page 108, line 20)

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<sup>2</sup> Inquest Report, page 108, line 6 to page 112, line 7

Cooper: Just explain in your own words what happened after you open the gate? (page 108, line 21 to line 22)

Van Wyk: The gate was opened by Major Genis. He stepped out and gave the keys to me. The deceased followed him. I followed. I locked the gate. The deceased stood behind me on the stairs. We started walking down together. After we walked for a small bit, his foot slipped and it looked as if he lost his balance completely. He slid down to the bottom stairs, half on his side and on his buttocks. (page 108, line 23 to page 109 line 4)

Cooper: Now tell us, Mr van Wyk, could you see it clearly? (page 109, line 5)

Van Wyk: It was dark. A light was burning at bottom of the passage, but I could see, I was with the deceased and could see him slide down. (page 109, line 7 to line 9)

Cooper: And tell me, how many stairs did he slide down? (page 109, line 10)

Van Wyk: I do not know how many stairs there are, it is from the corner. The stairs make a turn, then you go down to a landing again and down. It was at the second set of stairs at the bend. It was about there. (page 109, line 12 to line 15)

Cooper: Can you tell us on how many stairs he slid? (page 109, line 16 to line 17)

Van Wyk: Well, it is the entire last part of the stairs. I don't know how many stairs there are. (page 109, line 18 to line 19)

Van Wyk: Your honour, Exhibit E, I accept it is the bottom part of the of the stairs; then I just want to show that it is where the stairs make a turn, it was more or less there. (page 109, line 21 to line 23)

Cooper: Did he slide on his buttocks? (page 109, line 24)

Van Wyk: Half on his buttocks, half on his side and then again on his buttocks as he tried to get up, he tried to get up. (page 109, line 25 to page 110, line 2)

Cooper: But did he not roll? (page 110, line 3)

Van Wyk: No, he did not roll like that. (page 110, line 4)

Cooper: He did not roll like a spinning top? (page 110, line 5)

Van Wyk: No. (page 110, line 6)

Cooper: Was that all the stairs he fell down? (page 110, line 7)

Van Wyk: It was the bottom part of the steps. (page 110, line 8)

Cooper: As on Exhibit, was it all those steps that we now can see on Exhibit E? (page 110, line 09 to line 10)

Van Wyk: Yes. I won't say to the bottom. Major Genis had come closer to the stairs and most probably he wanted to stop or help up the deceased, I said he came closer ... it was approximately I would say the bottom two, three steps where the deceased was helped up by major Genis. (page 110, line 11 to line 15)

Cooper: Now explain to me and the Court, did he fall, like we see on Exhibit E, at the top where the stairs turn? (page 110, line 16 to line 17)

Van Wyk: At the corner of the bend. Your honour, it was just ... (page 110, line 18 to line 19)

Cooper: At those stairs he fell down? (page 110, line 20)

Van Wyk: Yes. (page 110, line 21)

Cooper: To where? (page 110, line 22)

Van Wyk: I would say virtually to the bottom. (page 110, line 24)

Cooper: Virtually to the bottom? Just now you spoke of the last three? (page 110, line 24 to line 25)

Van Wyk: Yes it could have been the last two, three, he did not role into the passage. It was at the bottom of the stairs where major Genis helped him up. (page 111, line 1 to line 3)

Cooper: So it was the top lot of stairs to the last:? (page 111, line 4 to line 5)

Van Wyk: Yes, there was not a lot of many stairs. (page 111, line 6)

Cooper: See, in your statement you gave a different description about what allegedly happened. 'He tried to keep his balance.'? (page 111, line 7 to line 9)

Van Wyk: That is correct. (page 111, line 10)

Cooper: Where did he try to keep his balance? (page 111, line 11)

Van Wyk: Just as his foot slipped. (page 111, line 12)

Cooper: Where was that? On the bend? (page 111, line 13)

Van Wyk: At the corner there. (page 111, line 14)

Cooper: Or has he already started going down? (page 111, line 15)

Van Wyk: No, it was at the corner. (page 111, line 16 to line 9)

Cooper: On the corner. But he fell, the last few steps to the bottom (page 111, line 17 to line 18)

Van Wyk: Yes, that is correct. (page 111, line 19)

Cooper: But look, he either fell down all the stairs or did he only fall at the bottom? (page 111, line 20 to line 21)

Van Wyk: The position lasted from the moment that he slipped down the steps, as I said, he could have been stopped on the bottom two or three steps by major Genis. (page 111, line 22 to line 24)

Cooper: Just tell me sergeant van Wyk, the deceased walked up those stairs much? (page 111, line 25 to page 112 line 1)

Van Wyk: No. (page 112, line 2)

Cooper: Had he never been on these stairs before? (page 112, line 3)

Van Wyk: Not as far as I know. (page 112, line 4)

Cooper: Was this the only time, the first time in his life that he came down those stairs? (page 112, line 5 to line 6)

Van Wyk: As far as I was aware. (page 112, line 7)

### 3. Post mortem report D.R. 2013/69, 28 September 1969

Haron died 8 days later on 27 September 1969 apparently in his cell in Maitland Police Station. On 28 September 1969, Dr TG Schwär performed the autopsy on the body of the late Haron.

According to the versions of the police, the injuries sustained by Haron and the marks reflected on his body were sustained during the alleged fall down a staircase.

## DISCUSSION OF THE ALLEGED FALL

The salient information from the allegations of Genis and van Wyk, mentioned earlier is summarised below. These allegations were used together with information from the Post Mortem report, and data I gleaned from my inspection at the alleged fall scene to perform the technical assessment.

Genis alleged the following:

1. Heard a splashing sound;
2. The deceased slid down the last few stairs;
3. Haron was obviously sitting on his bottom;
4. Genis assisted Haron to stand. He asked him if he was fine;
5. Genis states Haron said he was not hurt, he just got a fright;
6. Genis stated there was no signs of physical injuries.

Van Wyk alleged the following:

1. Haron slid down to the bottom stairs, half on his side and on his buttocks;
2. It was at the second set of stairs at the bend, it was about there;
3. Haron stops about two or three stairs from the bottom;
4. Haron was sliding from the bend in the stairs when he lost his footing until the second or third step from the bottom.

Analysing the police versions, the following information was considered in the technical analysis about the alleged fall:

1. Lost his footing at the corner of the landing before the next flight of stairs.
  - a. Lost his balance and may have immediately or descended a step before falling backwards onto his buttocks and side.
2. Given the handrail was close by, he may have:
  - a. Free fallen due to gravity in an uncontrolled manner from a standing position onto his side and buttocks and then slid down the stairs;
  - b. In a controlled manner, while attempting to clutch on the handrail or balustrade, tried to regain his balance and engaged in a controlled fall down the stairs .
3. According to Genis, Haron mentioned he did not get hurt, he just got a fright.

From desk research analysing falls down stairs the following types of falls have been identified when a person is descending stairs:

1. Fall forward and tumble down the stairs. This is common when mis-stepping as one descends.
2. Fall backwards when one slips on stairs and your feet go forward under you.

On the versions of Genis and van Wyk, Haron would have fallen backwards, and impacted the stairs with the side of his leg and buttocks and slid down the stairs.

Unlike free falling from heights, where the injuries sustained are well documented and the possibility of a fatality directly correlates with the height the victim has fallen, falling on stairs is more complicated as a person falls a small height from a standing position onto the stairs and then either tumbles or slides down until he/ she comes to a standstill or collides with something before stopping.

The research paper "*Fatal falls down stairs*"<sup>3</sup> documents cases of fatal falls down stairs. The study undertaken in Scotland looked at fatal falls between 1992 and 1997, where 51 individuals comprising 27 men and 24 women, with a combined mean age of 68.9 years died falling down stairs. In these falls, the injuries sustained in the following areas caused the death:

1. Brain/ brainstem injury: 35 people;
2. Cervical spinal cord injury: 8 people;
3. Rib fractures with a flail segment: 6 people;
4. Rib fractures without a flail segment or internal injury: 3 people;
5. Liver injury: 2 people;
6. Rib fractures with massive haemothorax: 1 person;

47 people died from only one of the injuries sustained and only four died from a combination of the injuries.

In another research study<sup>4</sup>, it was found that 57 individuals who died from a fall involving stairs all had skeletal trauma near their cranial base and if the fall was more than half a flight of stairs, fractures to their cervical vertebrae.

An accident advice helpline<sup>5</sup>, states the top three injuries caused by falling down stairs are:

1. Bruising, as result of impacting the step which is typically a hard surface,
2. Sprain and dislocations typically in the wrists. An instinctive reaction to breaking a fall is to put one's hands out. Depending on what the body impacts, the shoulder can sustain dislocations;
3. Head injuries because of the head hitting the stairs.

In these desk research findings and in another case study<sup>6</sup> were a series of experiments were carried out using a dummy. The dummy was located at the top of the stairs and fell forward head first, backwards feet first and was pushed from forward and pushed from behind. In every experiment the dummy sustained head and back injuries. In most of the desk research, whether

<sup>3</sup> Wyatt JP, Beard D, Busuttill, "Fatal falls down stairs", Injury, International Journal of the care of the aged, 4 September 1998, pages 31 to 34.

<sup>4</sup> Rowbotham SK, Blau S, Hislop-Jambrich J, Francis V. "*Fatal falls involving stairs: an anthropological analysis of skeletal trauma*", Forensic Science Medical Pathology, June 2018, page 152 to 164.

<sup>5</sup> <https://www.accidentadvicehelpline.co.uk/blog/> >> Top 3 injuries caused falling down stairs

<sup>6</sup> Nagata H, "Case Study on possible falling patterns of a fatal fall from stairs", Industrial Health Journal, September 2014, pages 432-438.



journal articles or blogs related to people falling down stairs, there are injuries on the back of the head, neck, shoulders, thoracic, buttocks, calves and the rear ankles.

This report aims to determine, the impact velocity/force applied to Haron during the alleged fall. It is evident that the magnitude of the impact had he allegedly slipped and fell on his buttocks did not result in substantial bruising on his rear head, rear neck, shoulders, back, and buttocks. He did not break any bones during the alleged fall.

## Physical Dimensions of Haron

### Haron personal information:

Age: 45 years  
Weight: 64.4 KG (140lb)  
Height: 1.7m (5ft 5in)

### Detention details:

Taken into custody: 28<sup>th</sup> May 1969  
Date of Fall: 19 September 1969  
Date of Death: 27 September 1969<sup>7</sup>

Cause of death (as per Post Mortem Report): Myocardial Ischemia.

## Stair Dimensions

According to Genis and van Wyk, Haron slipped and fell down from the lower level of the stairs. He apparently fell backwards and slid down the last few stairs and landed at the base of the stairs. In this regard please refer to Figure 1, below.

During a site visit to the Cape Town Central Police Station at 28 Buitenkant Street, the stairs were measured and drawn. The height and length of each step was measured to be the same:

riser = 145mm  
thread = 280mm.

Focussing on the lower level of stairs, there are 10 steps from the ground floor to the first landing and the overall height and length from the ground floor to the first landing are 1745mm and 2520mm respectively.

The step construction incorporates a 2.5-degree inclination, see angle measurement shown in Figure 1 to ensure that there is run-off from the steps, where the leading or front edge of the step is slightly lower than the internal corner.

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<sup>7</sup> Autopsy

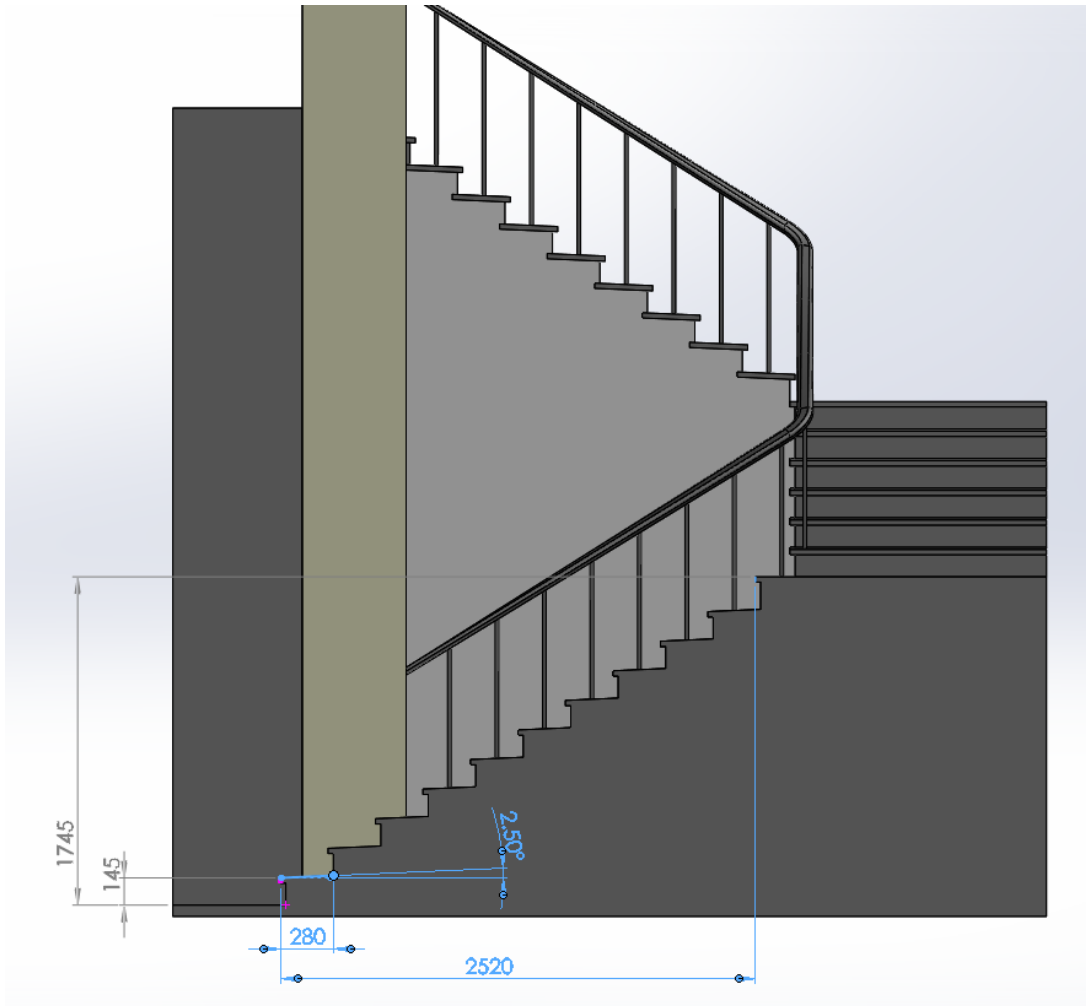


Figure 1: Dimensions of the bottom section of the stairs

## 1 Haron’s Body Structure

To determine the mass of the body segments that allegedly impacted the stairs on the versions provided by van Wyk and Genis, it is important to determine the mass and length distribution of the different parts of the body. There is substantial data on studies performed by doctors, students and investigators that provide the mass of the body segments as a percentage of a person’s overall mass, and similarly the length of the body segment’s as a percentage of the overall height of a person. The average measurements are set out in the table below.

Table 1: Average body segment mass<sup>8</sup> as a percentage of overall mass.

Segment	Males	Females	Average
Head	8.26%	8.2%	8.23%
Whole Trunk	55.1%	53.2%	54.15%

<sup>8</sup> source: <https://www.exrx.net/Kinesiology/segments>

Thorax	20.1%	17.02%	18.56%
Abdomen	13.06%	12.24%	12.65%
Pelvis	13.66%	15.96%	14.81%
Total Arm	5.7%	4.97%	5.335%
Upper Arm	3.25%	2.9%	3.075%
Forearm	1.87%	1.57%	1.72%
Hand	0.65%	0.5%	0.575%
Forearm & Hand	2.52%	2.07%	2.295%
Total Leg	16.68%	18.43	17.555%
Thigh	10.5%	11.75%	11.125%
Leg	4.75%	5.35%	5.05%
Foot	1.43%	1.33%	1.38%
Leg & Foot	6.18%	6.68%	6.43%

*Percentages of Total Body Weight*

Using the above table, the mass of body segments (head, thorax and trunk) of Haron was determined. This was done by applying these average body part percentages to Haron's total body mass.

**Table 2 Mass of body segments**

Body Segments	% of Total Body Mass	Mass of the Body Segment in Kgs
Head	8%	5.152
Torso	47%	30.268
Arms (x2)	10%	6.44
Legs (x2)	35%	22.54
TOTAL	100%	64.4

To determine the amount of the body mass that allegedly impacted the stairs, it is important to know the mass and length of Haron's body segments. This way, one can estimate the impact velocity or force on the body segments and the mass distribution of the body segments. The length of the body segments for a man is provided in the following figure.

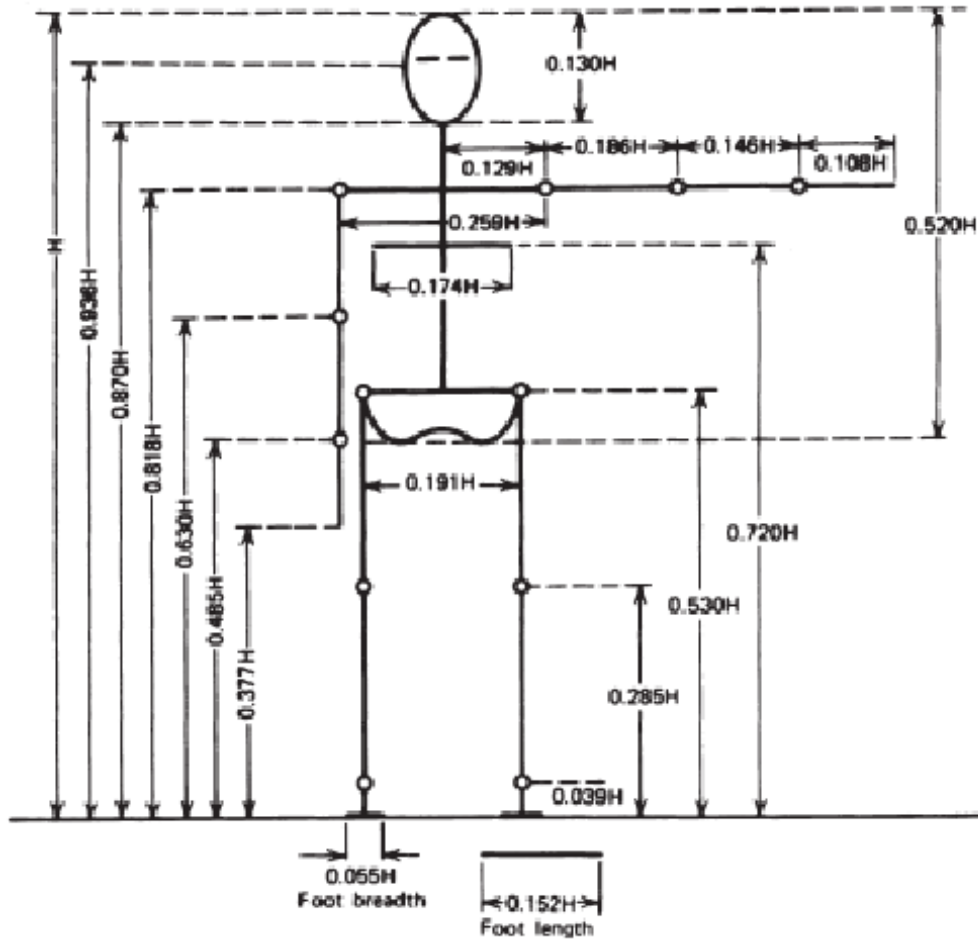


Figure 2: Length and Width proportions of a typical male, source<sup>9</sup>:

Using Figure 2, the length of body segments is presented as a percentage of height, the length of the body segments of the late Haron, who had a total height of 1.7m is provided in the Table 3 below.

Table 3 Length of the body segments for IA Haron (height of 1.7m)

Body Segment	% of Total Height	Length of the Body Segment
Head	12%	0.204
Torso	39%	0.663
Arm	42%	0.714
Leg	49%	0.833
Bi-acromial (Shoulder Width)	25%	0.425
Bi-iliac (Pelvis Width)	19%	0.323

<sup>9</sup> Ghasem Karimi, G and Jahanian, O, *Genetic Algorithm Application in Swing Phase Optimization of AK Prosthesis with Passive Dynamics and Biomechanics Considerations*, in *Genetic Algorithms in Applications*, 2012.

## Analysis of Haron's alleged slip on the stairs

Genis and van Wyk's claimed that Haron slipped, fell backwards and slid down the stairs and stopped two or three stairs from the bottom. If Haron had fallen backwards on the highest step when he supposedly landed, he would have most likely landed on the landing located on the bend, (refer to Figure 1) and may not have slid down the stairs. Van Wyk alleges that Haron lost his footing while turning the corner and as he continued down the stairs he may have fallen backwards and then slid to the lower stairs.

The alleged fall gives rise to two possible scenarios on the police version:

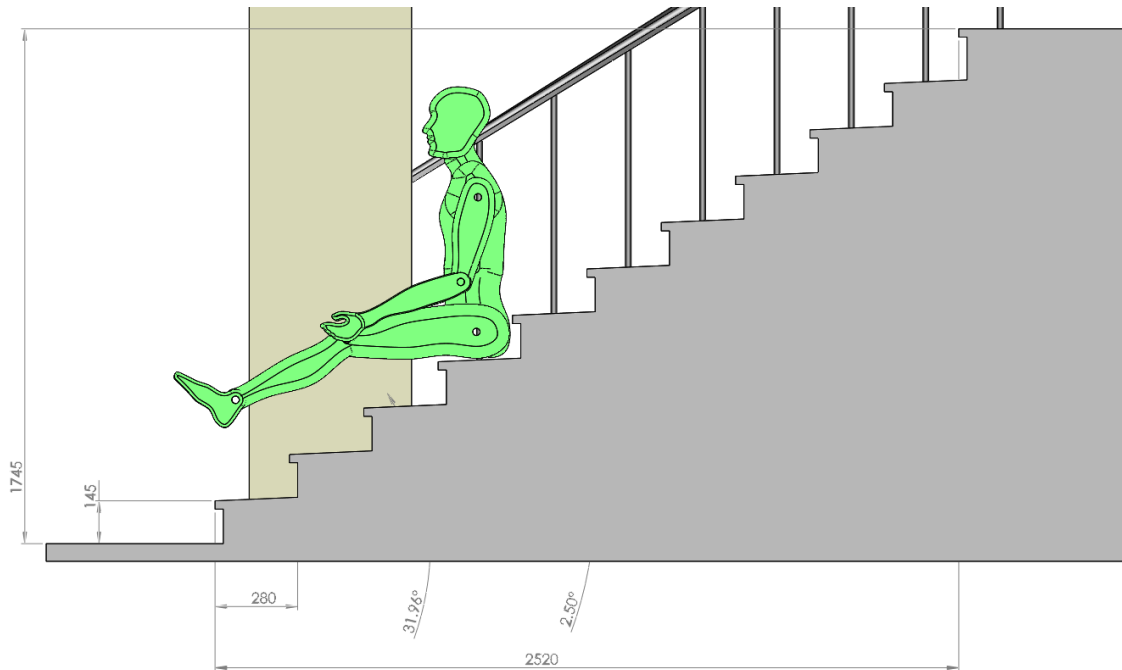
1. Scenario 1: Haron may have attempted to control his fall and landed mostly on his buttocks on the stairs;
2. Scenario 2: Haron may have had no control of his fall and he would have fallen backwards, landing with his buttocks, upper back and shoulders and his neck and/ or head all contacting the edge of the stairs.

Since, on the police version, it is not known exactly from where he allegedly fell, if he fell backwards the potential energy stored in his different body segments would have converted into a kinetic energy and his buttocks, back and shoulders and neck or head would have hit the edge of the stairs at different impact velocities.

The impact velocity at which the buttocks, back and neck or head segments would have impacted the stone stairs could have resulted in injuries like bruising, bone/ rib fractures, cervical vertebrae skeletal fractures at point of impact with the stone step edges.

### Analysis of Scenario 1

Scenario 1, where Haron lands with his buttocks on the same step where he slipped, implies that the torso remained vertical and that he fell vertically when impacting the step. This scenario assumes that the buttocks impacted the step before the legs hit the stairs, meaning that the full initial impact velocity and force was located on the buttocks.



**Figure 3: Illustration of Haron sitting on his buttocks on a step**

In order to assess the impact on the buttocks, both the potential and kinetic energy of the body must be calculated.

Kinetic energy is the energy which a body possesses by virtue of being in motion. Potential energy is stored energy, or the energy possessed by a body by virtue of its displacement from another body.

The Potential Energy was calculated with Haron’s upper body mass,

$$mass = mass_{torso} + mass_{head} + mass_{arms}$$

falling from the height of the buttocks (i.e. length of Haron’s legs) plus one step.

$$E_{potential} = mass * gravity * (LengthLegs + 1Step_{height})$$

$$E_{kinetic} = E_{potential}$$

$$V_{impact} \text{ (impact velocity)} = \text{sqrt}(2 * E_{kinetic} * mass)$$

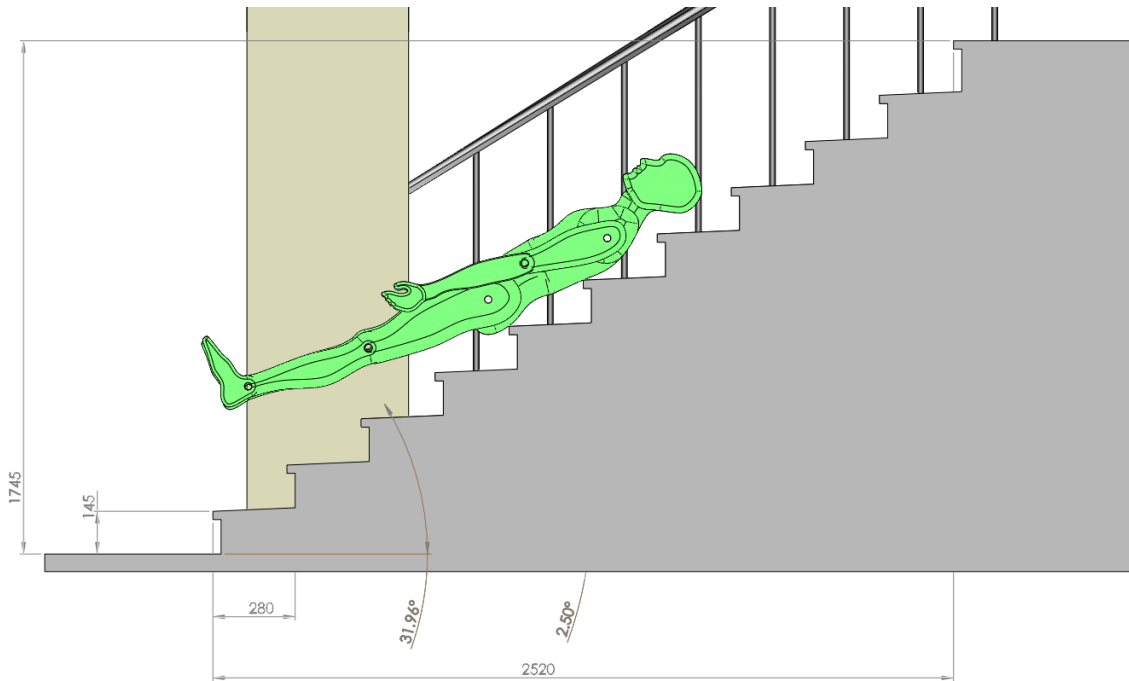
	Potential Energy (J)	Kinetic Energy(J)	Impact Velocity m/s
Initial slip, based on the Centre of Gravity falling 1.1m onto the stair	401.783 J	0	
Buttocks contact with Step	0	401.783 J	3.53m/s

The total potential energy, of Haron’s torso, head and arms, is converted into kinetic energy, in Haron’s buttocks at the point of impact with step. From the kinetic energy, impact velocity can

be determined, this is 3.5m/s or 12km/h. At these speeds there can be injuries sustained to the buttocks.

## Analysis of Scenario 2

As Haron allegedly fell, his torso would likely rotate backwards resulting in his back and head impacting on 3 step edges. This scenario assumes that the back of his torso and head impacted the edge of 3 steps before his legs hit the stairs, meaning that the Potential and Kinetic energy in all three body segments would differ and the impact velocity of each segment would be different.



**Figure 4: Haron falling backwards and sliding down**

As in Scenario 1, the energy of the body must be calculated. In this case, the buttocks, torso and head are assessed separately as they fall different distances vertically. The centre of gravity (CG) for both the torso and the head are assessed at 50% the length of each body part.

The Potential Energy of the buttocks was calculated using half the leg mass and half the torso mass. The Potential Energy of the torso was calculated using half the torso and arm masses, while the Potential Energy of the head was assessed using the head mass.

**Table 4: Inputs to determine the Impact force and the impulse**

	Mass used in calculations (kg)	Step of Impact	Height of each segment above step of impact (mm)
Buttocks	26.40	5	151.11
Torso	21.57	6	308.34
Head	5.15	7	465.56

**Table 5: Summary of Potential Energy per Segment**

Body Segments	Potential Energy above corresponding step in impact (J)	Kinetic Energy (J)	Impact Velocity (m/s)
Buttocks	176.63	176.625	3.658
Torso	181.20	181.199	4.099
Head	57.24	57.235	4.714

## Comparison of location of injuries in autopsy compared to analysis

The autopsy completed by Dr GT Schwär (in the presence of Dr E Slobedman) found the “main autopsy findings in connection with Haron’s body as the following:

1. Coronary atherosclerosis;
2. Pulmonary embolism;
3. Subpleural petechial bleeding;
4. Bruising on legs and chest.

The injuries and bruising are shown, in Figure 5 below, and taken from the Post Mortem Report.



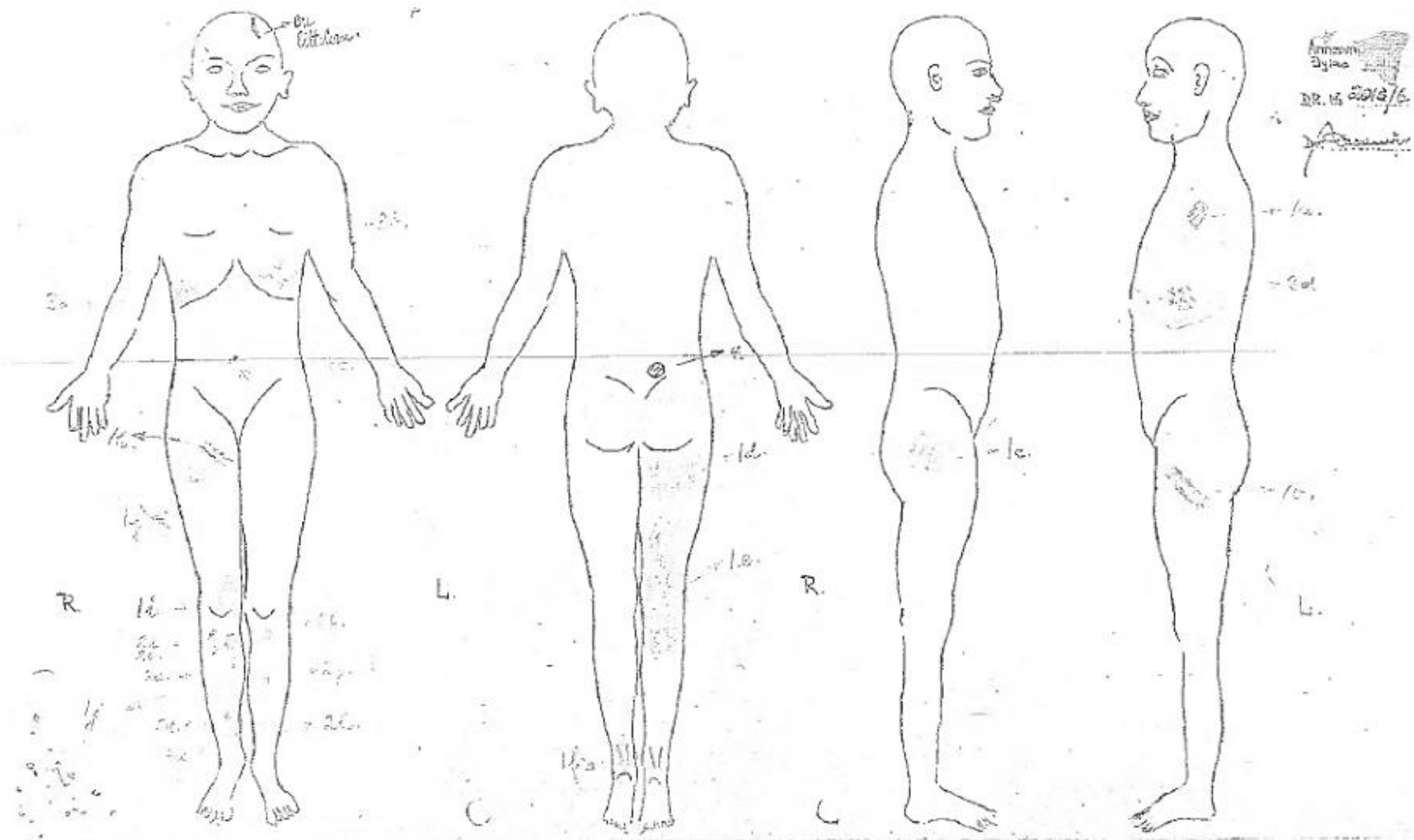


Figure 5 Illustration of the injuries on Haron's body

## Conclusion

The desk research undertaken by TMI Dynamics indicate that in cases where a person slips (loses his footing) while descending stairs, it is common for his feet to come forward from under his body and for the person to then fall backwards and land on one or more of the following body parts, his hands, buttocks, back, shoulders, neck and head.

Genis and van Wyk claimed that the injuries they saw when they inspected the body in the mortuary was a result of his fall down the stairs on 19 September 1969. However, the injury pattern on Haron's body do not reflect those typically seen in falls down stairs. They reveal no injuries to the hands, exposed areas of the back, shoulders, neck and head. Given that Haron allegedly fell backwards it is difficult to understand how there were several injuries on his anterior legs and chest.

An injury that could potentially be connected to a fall, as alleged by the police, is the bruise on the upper right outer thigh, reflected as 1c on Figure 5 taken from the Post Mortem Report. However, if this area impacted the edge of a step, I would have expected to see a longitudinal or rectangular shaped bruise as opposed to large general bruising.

There are no injuries on the buttocks themselves, where one would have expected to see some bruising if there had been a direct impact on the buttocks on the steps.


It is unlikely that the small bruise located in the small (depressed area) of the back (injury 4) could have arisen from a fall as claimed by the police. In my view this area would not have impacted the stairs, on either of the scenarios.

It is unlikely that the parallel longitudinal (or "tramline") injuries on Haron's upper side outer right thigh (1b) and upper back right thigh (1d) arose from a fall down stairs. Such "tramline" injuries are not consistent with an impact to the edge of a stair, as these involve multiple impacts to the same area.

It should also be noted that on Van Wyk's version he claimed that Haron slid down on one side but did not roll over. Yet the Post Mortem report discloses injuries on both outer sides of Haron's thighs (injuries 1c and 1b).

Given that there is no bruising on the buttocks, the back (aside from the small circular bruise on the back), neck or head, and considering the magnitude of the impact velocities that Haron's body parts would have struck the stairs with, the police version that all Haron's injuries were sustained during a fall down a staircase is, in my opinion, not credible. In contrast, there are significant injuries on Haron's chest, inner right thigh and calf, both shins and left hamstring which cannot be connected to the alleged fall.

Sincerely,



Thivash Moodley  
TMI Consultancy Pty/Ltd (t/a TMI Dynamics)