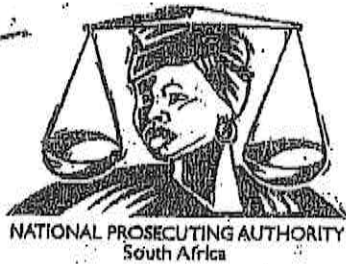


ANNEXURE 'POS-11'

~~XXXXX7~~

OFFICE OF THE NATIONAL DIRECTOR OF PUBLIC PROSECUTIONS

Victoria & Griffiths Mxenge Building
123 Westlake Avenue, Weavind Park, Silverton,
Pretoria, 0001

Private Bag X752, Pretoria, 0001

Contact number: 012 845 6758

Email: ndpp@npa.gov.za
www.npa.gov.za

INTERNAL MEMORANDUM

TO: ADV N. JIBA

COPY TO: DR J.P. PRÉTORIUS SC
ACTING SPECIAL DIRECTOR OF PUBLIC
PROSECUTIONS: PCLU

FROM: ADV S.K. ABRAHAMS
NATIONAL DIRECTOR OF PUBLIC PROSECUTIONS

REFERENCE: NDPP/JL/01/2016

DATE: 12 APRIL 2016

SUBJECT: REFERRAL OF CASES TO THE PRIORITY CRIMES
LITIGATION UNIT

Dear Adv Jiba,

1. Over and above all the matters I have referred to the PCLU in my previous memorandum dated 18 November 2015, I also refer all matters relating to:

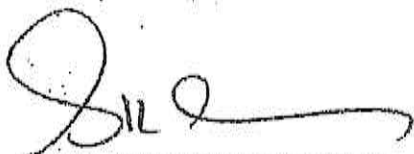
Paul Robert O'Sullivan,

to this unit, which investigations and prosecutions must be managed and directed by the Acting Special Director of Public Prosecutions and Head, Priority Crimes Litigation Unit (PCLU).

justice in our society so that people can live in freedom and security

2. The PCLU should deal with all offences relating to the above named as well as all prosecutorial functions incidental to the management of investigations and prosecutions relating to the above named.

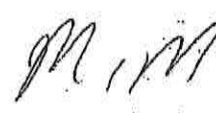
Yours sincerely



ADV. S. K. ABRAHAMS

NATIONAL DIRECTOR OF PUBLIC PROSECUTIONS

DATE: 12-04-2016



Justice in our society so that people can live in freedom and security.



E-M

POS-12

AFFIDAVIT

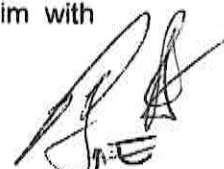
I, the undersigned,

PETRUS JACOBUS VILJOEN

IDENTITY NUMBER 690203 5068 00 7

DO HEREBY MAKE OATH AND SAY THAT:

1. I am an adult male businessman with my address at Menlyn Woods Office Park, Sprite Avenue, Menlyn Pretoria. My telephone number is 082 042 2410. I make this statement without any threat of fear or promise of favour and do so willingly.
2. I am one of the accused under Johannesburg Central case number 1094/05/2010. I have consistently stated that I am innocent of all charges and am wrongly accused.
3. I was contacted on or about September or October 2016 by Mike Bolhuis, for a meeting with a certain Colonel Kobus Vlok 'Vlok'. I was introduced to Vlok, by Mike Bolhuis, a so-called private investigator based in North-West Pretoria. I met Vlok at Bolhuis' house in Kameeldrift around about that time. I had known of Mike Bolhuis for a number of years, and came to know him when he threatened a client of mine many years ago. Only Bolhuis and Vlok were present, together with myself. I subsequently discovered, the colonel was in fact a Warrant Officer.
4. Bolhuis told me that Vlok wanted to meet with me, as some of the cases I had made, had not properly been investigated or had been unlawfully closed. These cases included charges against senior police officials and other prominent persons which related to unlawful dealings in state owned property. The cases had been opened in 2013 and/or 2014. At the meeting, Vlok had documents with him, and Vlok made it clear he had been investigating the matters and he declared that I had been 'set up'. He also said he had the original of my dockets and that he had hidden them away, so that no-one could get to them.
5. After this initial meeting, Vlok would call me from his phone with numbers 082 470 3282 or 082 728 7616. Vlok tried to persuade me that Mr Paul O'Sullivan, 'O'Sullivan' had taken control of the Hawks, he stated as much and included Zunaid Moti and Shadrack Sibiya in O'Sullivan's 'control' of the Hawks. He then said a project was being registered against Paul O'Sullivan. I should mention at this point that I had previous dealings with O'Sullivan in or about 2013 and/or 2014, when I supplied him with



E.M

information on one of the cases he was working on. There was never any contractual relationship between O'Sullivan and myself.

6. Vlok called sometime in late September or early October and went on to tell me that he was busy with an urgent application by Paul O'Sullivan. He said that O'Sullivan was causing chaos in the Hawks with all his allegations and that this would lead to further problems for them. He later came to see me at Menlyn Woods Office Park, and at that meeting he told me, he was going ahead with the investigations on the cases I had opened. He told me that he had taken the cases to the Attorney General and that he would look at all the cases together.
7. One evening, probably around mid-November 2016, Vlok phoned me to say that he had just come from the Minister of Police and that the Minister had authorised a project along the lines of what I mentioned above, and the project would specifically target Paul O'Sullivan and others involved with O'Sullivan.
8. Vlok was of the opinion that my cases would lead to Paul O'Sullivan, because my cases were predominantly implicating Zunaïd Moti and others, and Vlok said he was of the opinion that O'Sullivan was working closely with Moti, and that they were involved in crime together. He mentioned that there was some investor involving a fish and chip shop, franchise network, where O'Sullivan and Moti defrauded someone out of millions. I got the impression from Vlok, that O'Sullivan would lure people to Moti and Moti would fleece them out of millions, according to what Vlok told me. He also told me that Paul O'Sullivan owes Zunaïd Moti R4.5 million. He also said, and my wife Mel, was present when he said this, that the JPC (Johannesburg Property Company) case against me, will be finally withdrawn and it will never be reinstated against anybody for two reasons. One, it implicates a lot of ANC big-shots, and two, if it goes ahead, then other people that should have been charged will not be able to be charged. He told me the attorney general had told him this.
9. He also told me that a letter had been written to the prosecutor, Adv Dries van Rensburg, by the attorney general, after looking at all the cases of mine, to halt the prosecution against me, in terms of the above mentioned case. This sounded right to me, as the appearance on or about the end of November 2016, the prosecutor had to rush off to a meeting with the minister.
10. On or about 25 November 2016, I got a call from Chad Thomas, he told me it was five years since we had met. In a later telephone call, Vlok told me he was about to arrest Chad Thomas, for the offence of 'Impersonating a Police Officer' in that Thomas had

allegedly gone out in public saying to people that he's investigating them, as a member of the Hawks. Vlok said he would arrest Thomas, in order to get Thomas to give evidence against O'Sullivan. He said he would arrest anyone in order to get to O'Sullivan. I then told Vlok, why does he not let me set up a meeting with Chad Thomas, to see if I can get him to talk to him (Vlok). He agreed, and we agreed to meet on 2016-11-29 at 09h30 at Hawks ofcs in Silverton. I went there.

11. I should mention that sometime in the middle of November 2016, I was contacted out of the blue, by a woman, 'Candice' telephone No. 082 410 8488 and 083 659 7793 and her female friend' who's name I do not now recall, 083 309 7805. She called me to say that she knew of people that wanted to kill me, and she also said that someone linked to Krejcir had killed her daughter. She said that O'Sullivan was also linked. I gave her Vlok's number and also called Vlok and told him about her. I left it at that.
12. Present at the 2016-11-29 meeting was Chad Thomas, Vlok, and an African male, whose name I do not know, but was stated by Vlok to be a Captain. Thomas then said that he had been investigating O'Sullivan for some time. Thomas also said that George Darmanowic was working for Paul O'Sullivan. Thomas also alleged that Paul O'Sullivan is a spy for the UK and he, Thomas, would adduce evidence to that effect eventually. Whilst at this meeting, Vlok telephoned to General Mokotedi, and I heard him say he needed to have an urgent meeting with all the role players working on Paul O'Sullivan, to discuss all the matters pertaining to Paul O'Sullivan. It was agreed that there would be a meeting soon, and in the meantime, everyone should keep secret about it all. Vlok said the police could not go to the papers and discredit Paul O'Sullivan. After offering to do so, it was agreed at this meeting, that Chad Thomas would use his connections in the media to discredit Paul O'Sullivan. I should also mention that, at this meeting, Thomas made it clear he was best friends with General Mokotedi.
13. Vlok later sent me an SMS on 2016-12-01 to set a meeting on 2016-12-05, at 09h30 at the Hawks Headquarters in Silverton, Pretoria. At the last minute, ie 09h28 on 2016-12-05 I got a further SMS from Vlok to change the meeting location to a guest house, located at 1170 Breyer Avenue Waverley, Pretoria. The owner is Sharon Very.
14. After arriving at the meeting Vlok introduced me to the following people, some of whom are known to me:

Major General Prince Mokotedi – he was in charge

Another General whose name is unknown to me, but is an African male

A Brigadier, whose name is unknown to me, but is an African male

A femal white Colonel, whose name is unkown to me Blonde, skinny, about 45 years of age, with bright finger nails.

Chad Thomas – private investigator previously mentioned No. 076 631 7007

Glenda Paul - the wife and partner of Chad Thomas

Mike Bolhuis – private investigator No. 082 447 6116

Hugo Wolmorans – Private Investigator No. 083 265 1804

Lance Epstein – private investigator (claimed to be representing Shawn Abrahams, when I met with him outside, before the meeting commenced. He told me that his brother is senior counsel acting for Shawn Abrahams– Epstein also told me he would be paid by the police out of this project) His No. 083 600 0006

Nicola ????? – assistant to Lance Epstein No. 072 120 0034

15. When I was introduced by Vlok, some discussions took place about my role in the meeting. Vlok reported to the whole meeting that I was to be his star-witness against O'Sullivan and others (involved with O'Sullivan) and that a letter had been issued stopping the prosecution against me. I took this to mean that there was a *quid pro quo* insofar as I would help them with O'Sullivan matters and the cases against me were already gone. The generals present were clearly in agreement with this.
16. I should mention that by this stage it was clear to me the ONLY purpose of the meeting was to seek possible ways of 'taking down Paul O'Sullivan'. I can honestly say that I have never seen such desperation as I saw that day, to target and nail one person. It is for this reason that I have reflected on it, and have decided to come forward. The other reason I have decided to come forward, is that I was 'promised' that the charges against me had been dropped and that a letter to that effect had been issued. It was only when I demanded a copy of that letter, it became apparent to me, that, because I had not offered to give tangible evidence against Paul O'Sullivan and did not offer to give false testimony against Paul O'Sullivan, that I was no longer needed in this 'special project' and it became apparent to me that the promises made to me, about the charges being withdrawn may in fact be false, and therefore amount to the offence of fraud, in that the promise was made in order to subsequently induce me to make criminal allegations about O'Sullivan.



E-m

17. The following discussions took place by the following people at this meeting:

First there were the introductions, by Vlok as I previously mentioned.

Then Bolhuis, saying he was speaking on behalf of himself and Thomas, said that I should not be at the the meeting, even though I was an honest person. Thomas then denied that he had previously introduced me to O'Sullivan, some five years prior. Bolhuis said that for fear of their lives and the connections between Paul O'Sullivan, as alleged boss of the underworld, they would prefer not to have me present. It became clear to me that Bolhuis and Thomas realised that I would expose them if they lied or gave false evidence to bring about the downfall of O'Sullivan. Bolhuis also alluded that I would leak sensitive information outside of the meeting. In this regard, I later recall Vlok telephoning me, to say that Zunaïd Moti had called him one hour after the meeting.

After Bolhuis had spoken, Thomas said he had never acted for me, and had never introduced me to Paul O'Sullivan.

At that point Vlok admitted that they, being the whole of those present had nothing on O'Sullivan and could not find any case that would stick. I had previously discussed this with Vlok several times and asked him how they were able to register projects, if they had nothing on him. Vlok seemed bothered by the association of O'Sullivan and Afriforum. However, it was stated by Vlok, that action had to be taken against O'Sullivan as he was 'destabilising' the country. All present were in agreement with what Vlok was saying.

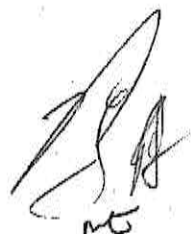
I then said to the General that I was the only person with nothing to gain in this meeting. These two people (referring to Bolhuis and Thomas) could not catch me out on any lie and I only want to tell the truth. I was then given the floor to talk, without interruption.

I made it clear that I had been informed that my case had been withdrawn. No-one disputed this. I also made it clear that I would only tell the truth. I then said, that I could not be complimentary to Bohuis, as I had known of him for many years and he acted unlawfully for example, threatens and extorts people. Bolhuis wanted to interrupt, but was not allowed to. I stated that Bolhuis is currently acting for a co-accused of Radovan Krejcir (Andre Smit) and is taking huge amounts of money from him. I also said that Bolhuis had done business dealings with Hugo Ras, whilst he is supposed to be investigating him. Vlok told me after the meeting, that Bolhuis acknowledged taking money from Andre Smit.

In respect of Chad Thomas, I made it clear to the meeting that Thomas was not being truthful about not introducing me to O'Sullivan, nor was he being truthful about never working for me. I pointed out that he had agreed in taking my car, a VW Tuareg, as payment for exposing the real culprits of the JPC scam, for which I had been charged. I also said that Chad Thomas investigates things for the Democratic Alliance, which are clearly political matters, and had introduced me to leaders of the DA and we together exposed the illegal sale of JPC land on Carte Blanche. I told them that when I would not give him my car before he had completed the task, he used his media connections to discredit me in the papers.

After this discussion, I then left the meeting and went away, as it was clear that Bolhuis and Thomas did not want me present.

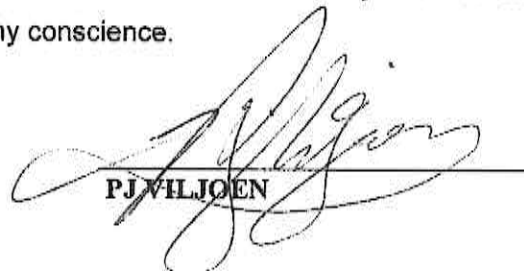
18. Later in the day, (on 2016-12-05) Vlok phoned me to apologise for Bolhuis' and Thomas' behaviour and said it was frowned upon by everyone there. I also got a call from Nicola, Lance Epstein's PA and she was very keen for me to meet with Epstein, for further discussions. However, I was about to go on leave and the matter would have to await my return.
19. Whilst I was away, at Plettenberg, on 2016-12-24, I sent a greeting message for christmas to Vlok. He wrote back and said *'It's a pleasure, I will maybe give you even better news when you're back'*.
20. Upon my return, I have tried to contact Vlok. I invited him to coffee, as I wanted to get a copy of the letter he was telling me about. I eventually sent him a long message on 2017-01-26, wherein I made clear the history of things and the letter that was issued to stop the prosecution. I did this, because I wanted a proveable audit trail of the various meetings and discussions, particularly concerning stopping my prosecution and the things they wanted to do with O'Sullivan.
21. I attach copies of the various SMS's between the parties hereto, which speak for themselves and need no explanation. I have initialled same for identification purposes. These are exchanges between myself and Vlok and between myself and Epstein and his PA, Nicola. I am also handing over tape recordings of calls for transcription and, once transcribed will check and sign same as evidence of the calls.
22. I therefore wish IPID to carry out an investigation against all the persons involved, particularly Vlok for the offences of:



E.M

- 22.1 **FRAUD**, in that an unlawful and intentional misrepresentation was made to me that the charges against me had been withdrawn, in the hope that I would testify against O'Sullivan, whereas at all material times, Vlok and the others involved, knew that the charges had NOT been withdrawn and they therefore committed the offence of fraud.
- 22.2 **DEFEATING THE ENDS OF JUSTICE**, in that on or between September and/or October 2016, and 2016-12-05 at Head office of the Hawks, and at a place and/or places unknown and at Waverley, Pretoria, an attempt or attempts were made to induce me to become part of a special project aimed at adducing false evidence against Paul O'Sullivan for the purpose of criminally charging him.

I know and understand the contents of this statement. I have no objection to taking the prescribed oath, with I consider binding on my conscience.


PJ VILJOEN

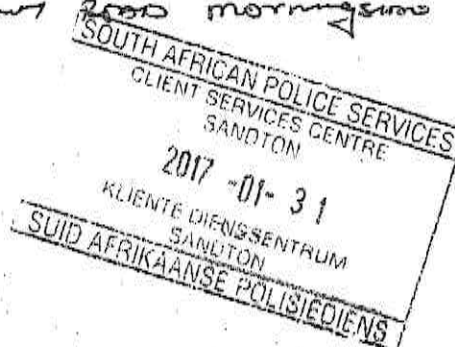
SIGNED and SWORN to before me at **GALLO MANOR** on this **THIRTY FIRST** day of **31 JANUARY 2017**, the Deponent having acknowledged that he/she knows and understands the contents of this Affidavit, which is deposed to in accordance with the regulations governing the administration of an oath as more fully set out in Government Notice R 1258 of the 21st July 1972, as amended by Government Notice 1648 dated the 19th of August 1977 and Government Notice 903 dated the 10th July 1998.


COMMISSIONER OF OATHS

Full Names: *Maimela Moeiso*

Status: *constable*

Street address: *PO 2 Summit Road Morningstar Sandton*



E.M.



73% 11:12

← Kobus Vlok 2 ▼
+27827287616

CALL MORE

Thursday, 01 December 2016



Morning
Arrangements for a
meeting as discussed.
Place: DPCI Head Office
Silverton
Date: [2016-12-05](#)
Time: 10:00.
Pls confirm if it's in
order for everyone to be
present.
Thx
Vlok.

09:31

09:43

Confirmed

Monday, 05 December 2016



Breyer Avenue 1170,
Waverley. Owner is
Sharon Vrey

09:28

Tuesday, 24 January 2017



Sorry, I can't talk right

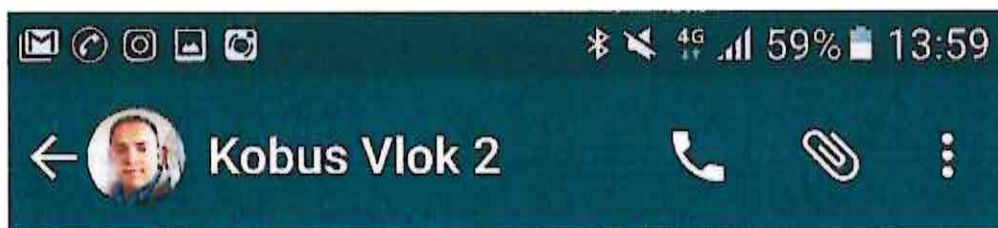


Enter message



E.M

[Handwritten signature]



12:11 ✓✓

24 DECEMBER 2016



20:11 ✓✓

Sien. Landrovers val nie vas nie 😂

20:11 ✓✓

Lol 😂😂😂

20:12

Dankie vir al jou hulp Kobus. Ek sal dit nooit vergeet.

20:13 ✓✓

Dit is 'n groot plesier, sal jou dalk beter nuus gee as jy terug is

20:14



Type a message



E.M.

[Handwritten signature]



Sien. Landrovers val nie vas nie 🤔

20:11 ✓✓

Lol 🤔🤔🤔

20:12

Dankie vir al jou hulp Kobus. Ek sal dit nooit vergeet.

20:13 ✓✓

Dit is 'n groot plesier, sal jou dalk beter nuus gee as jy terug is

20:14

Kan nie wag nie. 20:14 ✓✓



20:15

30 DECEMBER 2016

Ek is terug in pta. Laat weet wanne jy tyd het vir koffie.

09:24 ✓✓

Ek kamp nog, sal laat weet. 09:26

Geniet die kamp. 09:28 ✓✓



Type a message



E.M

[Handwritten signature]



14:02



Nicola Task Te...

+27721200034

CALL

MORE

Thursday, 26 January 2017

Hi Nicola. When can we
fit in coffee ? Regards
Peet.

07:18

N

I'm in a meeting. Will call
you back later.

08:50

08:51

Thanks

N

Hi Peet. Skies ek kom jou
eers terug na jou toe. Ons
is uit Gauteng provinsie
op n saak so dinge dol
hier. Ek is nie seker hoe
lank ons nog hier gaan
wees nie maar behoort
nie meer as 2 weke uit
kantoor te wees nie. Kan
ons reel wanneer ons
terug is?

10:42

Sal lekker wees. Ek wag
vir jou oproep. Ek is net



Enter message



E.M

Handwritten signature



4G 58% 14:02



Nicola Task Te... ▼

+27721200034

CALL

MORE

10:42

Sal lekker wees. Ek wag vir jou oproep. Ek is net bietjie gefrustreerd. Jy sal onthou in die 5dec meeting dat Kobus Vlok genoem het dat daar opdrag vanaf die P.G gestuur is om vervolging in my saak te staak. Ek probeer nou n afskrif kry van die brief. Dit voel of Kobus my vermy. Dalk is hy net besig. Wou maar net hoor of julle iets verder weet. Sal maar gesels as jy terug is. Sterkte.

10:59



Hi Peet! Ek weet Kobus is op die stadium baie besig en het vir Lance gese hy sal hom eers oor n paar weke weer sien want is oor die hele land besig

13:04



Enter message



E-m

ME



🔒 Messages you send to this chat and calls are now secured with end-to-end encryption. Tap for more info.

Hallo Lance. We met with Kobus Vlok last year. Please call at your convenience. Regards Peet.

18:06 ✓✓

TODAY

2017-01-31

Hallo Lance. It is my understanding that the table has turned. Vlok declared to genl Mokotedi that prosecution against me has been stopped, and a letter to that effect was issued. Since i requested a copy of that letter, Vlok became busy. Never taking my calls, and pretends to be in police protection. You and Nicola were keen to meet with me, but it seems i was the only fool not understanding, if i won't make up stories against o'Sullivan, I have no use to the project. Was nice meeting you, you struck me as straight forward. Regards.

07:32 ✓✓



Type a message



E.M

[Handwritten signature]



not understanding,if i won't make up stories against o'Sullivan, I have no use to the project. Was nice meeting you,you struck me as straight forward. Regards.

07:32 ✓✓

Morning Peet; I left you a message to say we were in Marikana on a matter and as soon as we have a gap we can meet. Unfortunately I have seen Vlok maybe twice since our meeting. To put our involvement into context, we were assisting Vlok - no one paying us and no mandate. Under the circumstances we are not actively involved and in fact have no idea of what is transpiring. Im not sure how we can assist as our line is through Vlok. I trust this clarifies our situation and involvement. Unlike the other people attending we have never met nor intend meeting your nemesis.

08:14

Thank you. Please have coffee at your earliest convenience.

08:37 ✓✓



Type a message



E.M

[Handwritten signature]
ME

POS-13

AFFIDAVIT

I, the undersigned,

PETRUS JACOBUS VILJOEN IDENTITY NUMBER 690203 5068 00 7

DO HEREBY MAKE OATH AND SAY THAT:

1. I am giving this affidavit, to supplement the affidavit I have made on 2017-01-31. The purpose hereof is to present the transcripts of the phone calls between myself and Kobus Vlok. The dates and times of each call, are listed thereon. For identification purposes I have initialled each page.
2. I now wish to mention my previous affidavit, of 2017-01-31. In that affidavit I stated that I had been contacted by Vlok in September or October of 2016. Having seen the calls and transcripts, it is now clear to me that I made a mistake in that the contact with Vlok first took place at the office of Mike Bolhuis, sometime in early July 2016. I was telephoned by Bolhuis and advised by Bolhuis that he had a cop in his offices, that I should meet. I met with Vlok at Bolhuis' office in Kameeldrift a few days later. It was a few days after this was when Vlok called me the first time, which I can now see was 2016-07-11.
3. Then I should mention that Vlok has repeatedly told me that he is in possession of the original Boschkop CAS 49/6/2013 and would not allow anyone else to get near it. This is the docket he refers to when he says it is in a secure place that is hard for him to get into. In this regard I refer to page 16 of the transcript attached. I also distinctly recall that on the 29th November 2016, when I met with Vlok at Silverton with Chad Thomas, and a black male Captain or Colonel that Vlok reports to, Vlok repeatedly calling Mokotedi in my presence, and told Mokotedi that 'We must meet urgently, this evening' However, Mokotedi could only make it on 2016-12-05.
4. I should repeat, as it has been alleged in the media that the purpose of the 2016-12-05 meeting was to facilitate an improved relationship between the police and certain private investigators. This is simply not true. The sole purpose of the meeting, as discussed on 2016-11-29 was to discuss taking down Paul O'Sullivan, which is why Vlok called Mokotedi on 2016-11-29. Vlok made it clear at the outset of the meeting, that the route to take down Paul O'Sullivan was through others, such as Zunaid Moti, Sibiya, Col Frik Smit and so on.

E.M

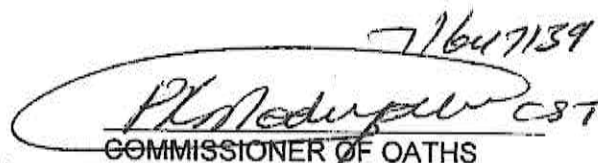


5. I also wish to mention, as further evidence of the fact that the meeting was about Paul O'Sullivan, some SMS or whatsapp exchanges between myself and Lance Epstein, which I attached to the previous affidavit. Although Epstein makes it clear there, that he has no mandate and is not being paid, this is in contradiction of what he told me at 1170 Breyer Avenue on 2016-12-05, where he made it clear that he was being paid by 'the project' and 'the project' was to take down Paul O'Sullivan, for allegedly 'destabilising the country'. If anyone alleges differently, they are lying.

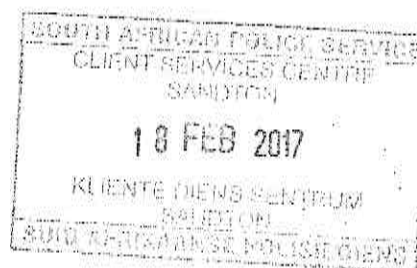
I know and understand the contents of this statement. I have no objection to taking the prescribed oath, with I consider binding on my conscience.


PJ VILJOEN

SIGNED and SWORN to before me at **GALLO MANOR** on this **EIGHTEENTH** day of **FEBRUARY 2017**, the Deponent having acknowledged that he/she knows and understands the contents of this Affidavit, which is deposed to in accordance with the regulations governing the administration of an oath as more fully set out in Government Notice R 1258 of the 21st July 1972, as amended by Government Notice 1648 dated the 19th of August 1977 and Government Notice 903 dated the 10th July 1998.

71647139

COMMISSIONER OF OATHS

Full Names: **PHUTU Raymond MADUPELA**
Status: **CONSTABLE**
Street address: **114 Bowling RD**



E.M.



POS-14

SWORN STATEMENT

Krejcir - Conspiracy to Commit Murder- Paul O'Sullivan – attempt No.7

1

I, the undersigned Paul O'Sullivan, ID No. 550826 5700 085 state under oath as follows:

2

I am an adult male businessman with my address as 7 Janine Road, Sandown, JOHANNESBURG and with telephone number 082 821 1666. The purpose of this statement is to ask the police to investigate and bring to a halt to, yet another attempt by Radovan Krejcir to have me murdered.

3

On 2016-05-10, I was contacted by a friend who wanted to see me urgently. He then took me to see another person, who said he had information that I was to be murdered. We then arranged to meet a person, who's details are now known to the police, but whom I shall just refer to herein as 'Source'. We then went to the New Road bridge over the M1 freeway in Midrand where we met with source, who then outlined the plan to have me murdered, which I set out below:

4

An under-cover agent (employed by Source) was approached in Pretoria and told that 'they' were looking for someone who could kill Paul O'Sullivan and the persons that could do this would be paid R200,000 in cash. The agent passed the information back up the line, resulting in a meeting with the agent's boss, 'Source', and the person looking for a hitman. This meeting took place at Bosman Street in Pretoria on the afternoon of 2016-05-10. Present at the meeting, were the Agent, the Source and the Suspect. The suspect only identified himself as 'G3'. He did however give out his telephone number, which was established as 071 582 8457. This number was traced by me back to a certain Gregory Mtimkulu ID No. 860213 5996 085, who's last known address was stated to be 1572 BLOCK H, SOSHANGUVE, GAUTENG, 0152. I have attached a copy of a forensic enquiry I have carried out on Mtimukulu as Annexure 'POS-1'.

5

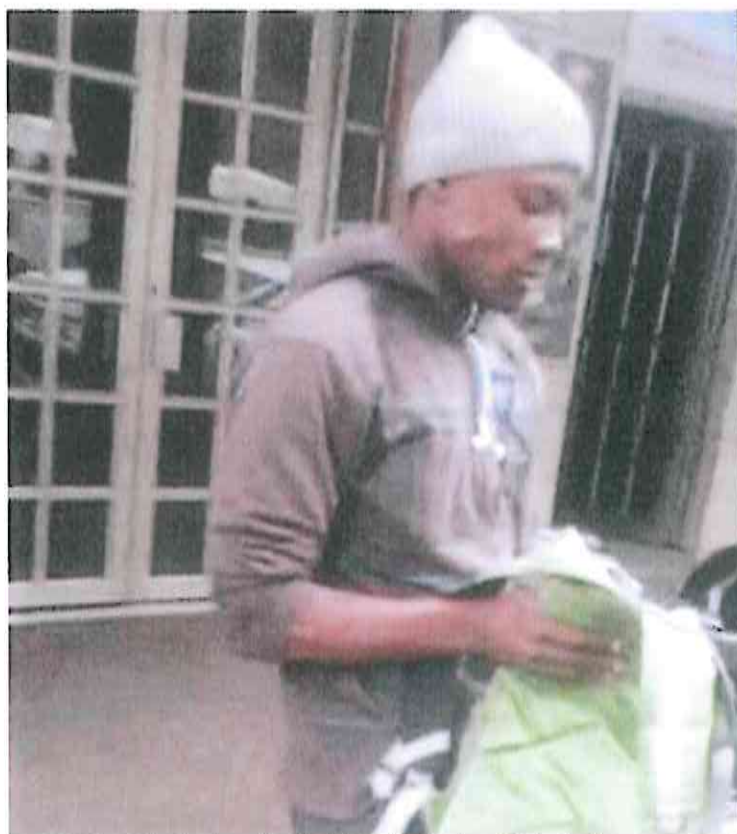
I wish to draw attention to the forensic enquiry, particularly to page 1 thereof, where it is clear that Mtimkulu uses the e-mail address 3GROXI.81@GMAIL.COM. It is clear that this e-mail address fits the exact name that Mtimkulu has announced as his nick-name when speaking to the undercover agent. The forensic enquiry also confirms the use of the telephone number 071 582 8457. I am therefore satisfied that the person attempting to recruit some to murder me, is the same Gregory Mtimkulu, that has been identified in the forensic enquiry.

6

Just prior to the meeting with Mtimkulu, the Source managed to surreptitiously take a short video utilising his smart phone. I have received that video and e-mailed it to the investigating officer. The person in the video standing next to the car and talking on the phone is the undercover agent and should be ignored and not referred to. The other person wearing a mauve hoodie and grey coloured beanie hat, and carrying the green coloured back-pack, is the suspect, Mtimkulu. From this video, I have played it several times and stopped and started it and have been able to produce what is known as a 'frame-grab'. That frame grab is copied and pasted below. It will be noted Mtimkulu appears to have a distinguishing cheekbone:

E.M

[Signature]



Frame grab of video depicting Mtimkulu

7

Just after Source and Agent met with the suspect, the suspect went to an internet café nearby, to print pictures of the 'target'. The video was made just after he returned from printing these pictures. The suspect then got into the car of the Agent and the Source. The Source sat in the driver's seat and the agent in the back. The suspect then produced the two pictures he had printed and showed them to the Source. The source then, using his cellular phone took a photograph of the pictures, being held by the suspect. That photograph is depicted below, but is also available digitally.



E.M

R.A. 22

8

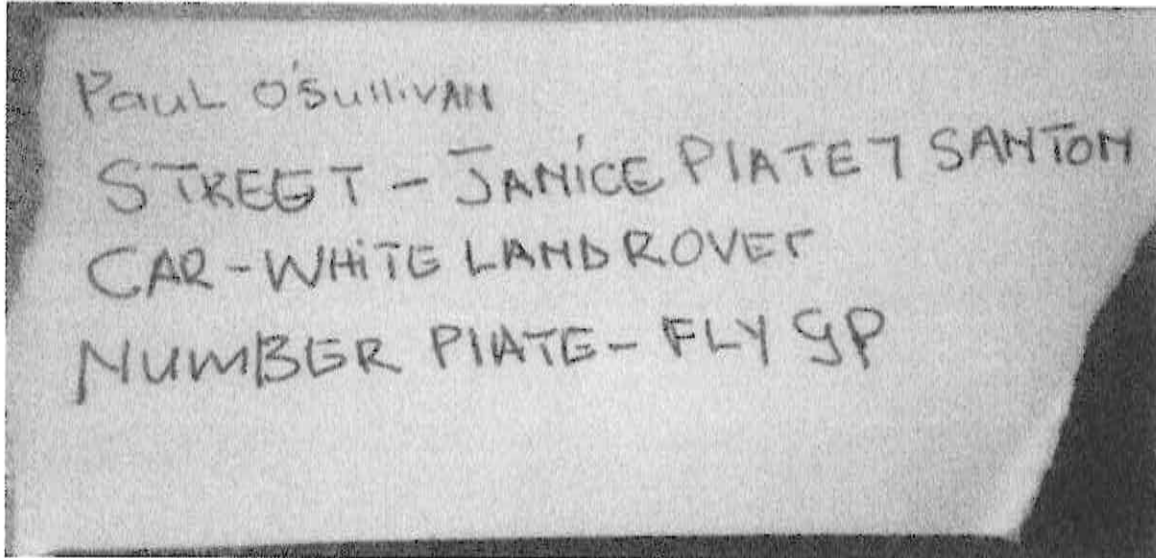
In the picture can be clearly seen, the hand of the suspect and the knee of the Source, as they are sitting in the car. The quality of the picture is such that the left thumb of the suspect can be forensically proven to be the same thumb as that in the picture.

9

It was then established, by Source and Agent that the suspect was getting his instructions from notorious criminal, **William Mashobane Mbatha**, (aka King of Bling) who is connected to Radovan Krejcir and they are both serving time together at Zonderwater Prisoen, where it was previously discovered that Mbatha was assisting Krejcir to escape. It was also discovered that Mbatha uses phone number **076 974 7234**. However, Mbatha is subjected to regular searches, so does not carry the phone himself. When the suspect wishes to speak to Mbatha, he sends an SMS that says Please call 3GROXI, this will result in the phone carrier, now known to be a fellow prisoner **Thabo Makgonyana** bringing the phone to Mbatha and making a call back to the suspect to continue with the conspiracy to murder me.

10

The source was also shown a piece cigarette packet, with handwriting on it. The handwriting was the details of the target, ie myself. Although not completely accurate, the details are sufficient for anyone to be able to deduce the correct details. He took a photo of that handwriting, which is reproduced below.



11

All of the above information was brought to the police team dealing with Krejcir on the afternoon of 2016-05-11, along with the Source, who was interviewed by the police, at Johannesburg Central Police Station. In the presence of the police, the Source arranged for his agent to call the Suspect, at which time the suspect confirmed the following to the agent, whilst on speaker phone so that the police officer could hear same:

- Paul O'Sullivan is the first target
- If this is done (and they want it done quickly) there will be four others to be killed
- Three of the others to be killed are in Johannesburg and one is in Pretoria.
- The price has now increased from R200,000 for the hit, to R250,000 as they need it done urgently.
- They agreed to pay R250,000 for each of the four remaining hits.
- The details of the four remaining hits will only be revealed when the first target (O'Sullivan) has been done.

12

As a result of the above, the police advised they will register a docket and proceed to obtain a Section 252A authority, to proceed with a trap. On the morning of 2016-05-12, I was advised by Lt

E.M

Colonel Ramuhala, that the docket had been opened, the 252A authorised and they are in the process of putting the operation together, to arrest the suspect.

13

On 2016-05-12 at 12h15 I received a call from Source, who advised me that he has been told the money is now ready and they have also put another 'team' on the job, due to the fact that Source did not come back to them to confirm the job, and whoever does the hit first, will get the money, on a first-come first paid basis. The suspect has confirmed that the other 'team' are happy to do the job now and get paid later, because they trust Mbatha, who has a reputation for meeting his commitments in such matters.

14

Source and Agent are no longer able to assist with the investigation, as they have both had to go up to the Modimolle on another assignment and will only be back late tomorrow, by which time the other team may have found its target. I therefore request URGENT intervention by the police, failing which it is inevitable that I should have to take steps to neutralise the threat myself.

15

Prior to me signing this statement, I have carefully read through it and am satisfied that the facts are correctly and accurately recorded. The following questions were put to me in person by the commissioner of oaths and I entered the answers thereto in my own handwriting:

'Do you know and understand the contents of this statement?'

Yes

'Do you have any objection to taking the prescribed oath?'

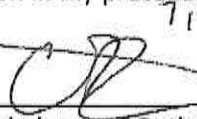
No

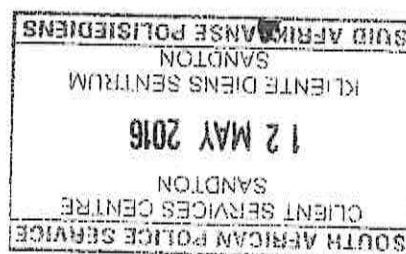
'Do you consider the prescribed oath binding on your conscience?'

Yes


Paul O'Sullivan

I certify that the deponent has acknowledged that he knows and understands the contents of this statement which was sworn to before me and the deponent's signature was placed thereon in my presence at GALLO MANOR on this TWELFTH day of MAY 2016


Commissioner of Oaths



E.M.

A