

[OFFICE]
e**SOUTH AFRICAN POLICE SERVICES AND DEPARTMENT OF JUSTICE AND****CONSTITUTIONAL DEVELOPMENT****AFFIDAVIT****REF.:****CASE NO.:** Cds 143/2/2025 (BVP)

**CRIMINAL CHARGES – KIDNAPPING / EXTORTION / THEFT / ASSAULT WITH
INTENTION TO DO GRIEVOUS BODILY HARM / MALICIOUS DAMAGE TO
PROPERTY / CORRUPTION / DEFEATING THE ENDS OF JUSTICE**

in the matter between:

ESMAEL MAULIDE RAMOS NANGY1st Complainant**STEFANE PEREIRA DA COSTA BRITES**2nd Complainant

and

MOHAMMED INIATH RAOOF*Durban Metro Police**Telephone number 083 261 4315***YASEEN ASHRAF THEBA ID****NUMBER 8001035242080****AND VISION TACTICAL****Reg. No.: 2014/226522/07****VISION TACTICAL****HOLDINGS****Reg. No.: 2019/387408/07****VISION TACTICAL NORTH****Reg. No.: 2019/386245/07***Director and employee at Vision Tactical, Vision Tactical Holdings and Tactical Vision North Who had all material times acted within the course and scope of his employment with these companies.**Cell number: 084 222 2222**Telephone number: 011 014 4700**Email address: info at [vision@tactical.co.za](mailto:info@vision@tactical.co.za)**Physical address: 23 W. Street, Houghton 2198***YACOOB YUSUF DESAI***Director of Extreme Defence with business address situated at 1756 Mahatma Gandhi Street Stanga Central,*S.B
E.M

ID NUMBER 8304015070087 AND ETREAM DEFENCE PTY LTD Reg. No.: 2022/862453/07	<i>KwaDukuza, KwaZulu Natal. Who had all material times acted within the course and scope of his employment with this company. Telephone number: 0875633914 Email address: admin@extremedefence.co.za</i>
CAPTAIN AZILE ENOCH	<i>Directorate of Priority Crimes KZN</i>
CONSTABLE SINGH	<i>Stanga Detectives SAPS</i>
COLONEL ISMAIL DAWOOD	<i>identity number 7512145095086 Anti kidnapping unit Couter State Security Crime intelligence Head Office</i>
NHLANHLA LUCKY MKHWANAZI	<i>KwaZulu Natal Provincial Police Commissioner Telephone number: 031 325 4825 Email address: provcomm.kzn@saps.gov.za</i>
COLONEL DEENA GOVENDER	<i>Directorate of Priority Crimes KZN</i>

CRIMINAL CHARGES

FIRST OFFENCE: KIDNAPING

That on or about 19 November 2024 to 22 January 2025 the complaints were unlawfully and intentionally deprived of their freedom of movement by the accused in that they were without lawful cause taken to a premises controlled by a company called vision tactical they were held against their will and then taken to Stanga polices station where the accuse unlawfully and intentionally abuse their possessions as Police offices by unlawfully and intentionally using and or manipulating the criminal justice system to hold the complainants against their will at Stanga Police Station. In addition, the first complainant wife was unlawfully and intentionally taken by the accused to Stanga Police station where she was not charged.

S.B
E.1

CRIMINAL CHARGES**SECOND OFFENCE: EXTORTION**

That from 19 November 2024 to 22 January 2025 the complainants were unlawfully and intentionally subjected to unlawful arrest and physical abuse by the accused with the sole aim of which was to extort from the complainants wife's the whereabouts of one Zakariyya Desai and his alleged captors under the threat of physical harm to the complainants and their family members and which induced a fear in the complainants wives that harm would come to the complainants if the whereabouts of Zakariyya Desai were not disclosed to the accused.

CRIMINAL CHARGES**THIRD OFFENCE: THEFT**

It that on or about the November 2024 at or near Kraft Road Edenvale, Captain Enoch Enoch of the Hawks unlawfully and intentionally appropriated the complainants their iPhones, R18 000 (eighteen thousand Rand,) wallet, passports, drivers licences, laptop, Mercedes Benz with registration number BH25SDGP, file folder with car papers and bank cards. Additionally, and during or about 19th of November 2024 at 18 Marylebone Street Midstream Estate, Centurion, the accused unlawfully and intentionally appropriated R35 000.00 (Thirty-Five Thousand Rand) which was in the bedside drawer of the first complainant's wife, Naziah Nangy, at the said premises. Additionally, that the accused unlawfully and intentionally appropriated a bolted safe by removing the bolts from the wall, causing damage to the wall and which contained 6 (five) genuine Rolex watches belonging to the first complainant and his wife, each with an estimated value from upwards of USD13 000 as well as diamond and gold jewellery and other items of value in addition to the first complaint's wife's genuine Rolex watch with an estimated value of USD13 000 as well as her Silver Visage Bracelet with an estimated value of USD1 900.

S.B.
E-17

CRIMINAL CHARGES

FOURTH OFFENCE: ATTEMPTED MURDER ALTERNATIVELY, ASSAULT WITH THE INTENTION TO DO GRIEVOUS BODILY HARM

That the accused unlawfully and intentionally attempted to murder (take the life of) both complainants by means of physical beatings and choking them with evidence bags filled with water which assaults took place against both the first and second complainants at Vision Tactical in Houghton, Johannesburg, Gauteng as well as against the first complainant at a farm in or around the Stanger area, after they were booked out of the Stanger Police Station. Alternatively, to attempted murder, the assaults inflicted on the complainants resulted in the complainants' bodily impairment in addition to unlawfully and intentionally inspiring a belief in the complainants that their bodily integrity would be immediately infringed which is what transpired despite the accused having a legal duty as Police officials to protect the complainants property and person. This happened on 19 and 20 November 2024 at Tactical Vision and on the 9 December 2024, where the first complainant was booked out of the Stanger Police Station by one Silver Naidoo, where he was unlawfully taken to the abovementioned farm and assaulted by the accused.

COMMON ASSAULT:

That on about 21 November 2024, the first complainant's wife's pregnant domestic helper Vania Muloche was unlawfully and intentionally assaulted by the accused at the first complainant's wife's, Naziah Nangy, residence situated at 18 Old Kent Gate, Midstream Estate, Centurion, Gauteng, Naziah Nangy was also assaulted by the police present on the day, by means of slapping her, kicking her, throwing her to the floor and pulling her up by the hair, until her braided hair came out. In addition, and at the premises at 18 Old Kent Gate, Midstream Estate, Centurion, Gauteng was ransacked.¹ This assault took place by the accused in front of the first complainant's minor children who, as at the date of this affidavit, still are traumatised and will be receiving counselling. More particularly, they are unable to sleep at night and only sleep during the day.

¹ attached to these papers are the pictures of Mrs Nangy and the ransacked house substantiating the allegations.

S.B.
Em

CRIMINAL CHARGES

FIFTH OFFENCE: MALICIOUS DAMAGE TO PROPERTY

That between November 2024 and 22 January 2025 the accused caused malicious damage to the first complainants Mercedes Benz with registration number BH25SDGP in that despite the complainants arrest , and the accused legal duty as members of the Police services, to protect and preserve the first complainants Mercedes Benz with registration number BH25SDGP, the accused acting with common purpose did not book the Mercedes in at the relevant police station where the complainants were arrested on the 19 November 2024, but unlawfully and intentionally took the Mercedes Benz to Stanga where the burn the vehicle with the intention to conceal evidence pf their unlawful conduct.

CRIMINAL CHARGES

SIXTH OFFENCE: DEFEATING THE ENDS OF JUSTICE

That 19 November 2024 to January 2025 the accused despite their legal duty as members of the Police Services and duty towards the complainants unlawfully and intentionally utilised and abused their positions as Police officials to hold in captivity the complainants by unlawfully and intentionally manipulating the provisions of the Criminal Procedure Act and Criminal Justice system in order to please the Dessi family that those allegedly responsible their sons kidnapping where being apprehended included in this that the accused unlawfully and intentionally tampered with evidence (being the Mercedes Benz with registration number BH25SDGP) by not booking the vehicle to the correct police impound in Johannesburg but by driving it to in or around Stanga where they , all acting with a common purpose, "burnt the vehicle out" in order to conceal evidence .

In each of the aforementioned criminal charges, the accused all acted with common purpose

S.B.
En

I, the undersigned,

ESMAEL MAULIDE RAMOS NANGY

(ID No.: 730126 5530 183)

do hereby make oath and say that:

1. I am an adult male businessman of Mozambican descent with a valid permanent residence permit, entitling me to reside in the Republic of South Africa. I reside at 18 Marylebone Street, Old Kent Gate, Midstream, Centurion. My legal representative's contact details are (012) 923 0603, (012) 004 2823, cell number 082 680 5226 and email address ricardo@ricardoarcangeli.co.za.
2. The facts contained herein are within my personal knowledge and belief both true and correct.
3. In this complaint I, together with the second complainant, would like to lay a criminal charge against all the accused, pursuant to the charges referred to above the details of which I will refer to hereinbelow. Additionally, we would like to lay a criminal complaint against the accused for assaulting our family members as more fully described in our bail applications to which reference will be made later on in the affidavit. The content of that affidavit ought to be read in conjunction with this complaint and form part thereof.

S B
G n

4. The second complainant will in the presence of the police officer depose to a confirmatory affidavit supporting what I say in this affidavit where it applies to him.
5. We were arrested on 19 November 2024 and, after various abuses suffered at the hands of the Police at Tactical Vision which is as far as I can understand in Houghton, Johannesburg and during our detention after we were booked out of the Stanger Police Station on 9 December 2024 after the court appearance, at around 12h00 to 01h00 the following morning, where we were beaten at, what appeared to be, a farm, as more fully set out in my bail application. We were then taken to the second appearance, where the Magistrate ordered that we would be detained at Westville Prison and that we were not to be detained at Stanger Police Station, after it was apparent to the Magistrate that we had been assaulted while in police custody. I was released on 22 January 2025, after the State withdrew its charges against me and I have the notes of the Magistrate that indicate that the Police were not to interfere with us, without our legal representative present, as per **Annexure "1"** attached hereto.
6. The background to our arrest and the circumstances of which, which I submit support the charges that we are laying against the accused, which are to a large extent dealt with in the bail application that we were going to submit to the Court at the time of our bail hearing which was scheduled to take place on 22 January 2025. However, since the State withdrew the charges against us, we never submitted the bail applications formally in court. The prosecutor at the time, Ms S Siverpersad (telephone number 031 334 5057 NPA reference number 10/3/5/1-85/2024), was furnished with a copy of my bail application. The reason I mention this is that a large amount of the facts leading to my unlawful arrest and detention and various other crimes perpetrated against us are contained in the affidavits in support of bail as well as the annexures thereto, a copy

S.B.E.M

of which I submit herewith marked as **Annexure "2" (Both Complainants bail applications)**.

7. I request that the content of that affidavit together with the attached be incorporated into this criminal charge.
8. The rest of this statement will deal with facts not contained in the bail application, but for purposes of the charges I wish to bring against the accused I now tender the further details as presented hereinbelow.
9. The second complainant and I were on our way back from Mpumalanga on the N4 to Johannesburg on 19 November 2024, where I stopped at Nelspruit to have breakfast (I think the name was at Nelspruit Crossing). Thereafter we left and went straight to Johannesburg as I was rushing to Home Affairs. At approximately 14h30 I passed the Delmas interchange passing Benoni where there was an accident. So, I had taken the Snake Road off-ramp and we went and came out at either Tom Jones Road or Atlas Road in Benoni, Johannesburg. When we got back on the freeway, we drove until Craft Road at all times the second complainant and I were driving my Mercedes Benzes with registration number BH 25 SD GP. While approaching Craft Road I said to the second complainant that he should take this money (in the amount of R600.00) and that he must drop me off at my house, situated at 18 Marylebone Street, Midstream Estate and return with the car for a service.
10. In the glove compartment of the Mercedes Benz, with registration number BH 25 SD GP, I had a folder with my car papers and R18 000.00 cash. I am also the owner of the car, as is evidenced by the invoice where I purchased the vehicle from Woodmead Auto. See **Annexure 3**.

S B
E 1

11. We were just past the Craft Road interchange by the bridge of Craft Road, where I saw a white Golf 8 next to me with all guns out of the car and in front was a BMW, which I cannot recall the color. The accused pulled our car over and put us on the floor. As they jumped out of the car, they were pointing their guns at us. They proceeded to put, what seemed to be some type of cover over our heads, so that we could not see where they were taking us. At no stage were we shown a warrant for our arrest.
12. We then went to a house. I am unfamiliar as to the exact location of the house. As will be seen in the bail application, the LPR footage demonstrates that the house was in Houghton and we suspect that the place we were taken to belonged to Vision Tactical, but I will return to this later in this statement.
13. The house that we were taken to was most definitely not a police station. It also bears mention that, at this point, nobody identified themselves as policemen to me and I was not presented with a warrant of arrest by anyone wielding guns towards me or putting my head in the bag.
14. Upon arriving at the house, the people who arrested us ripped off our clothes using a knife whilst we were handcuffed, causing significant pain on the body, particularly the hands where the clothes met the chains of the handcuffs. Neither of us or our possessions were taken into any station to be booked in the SAP13 or out as I understand is required.
15. At this house, the persons YASEEN THEBA, MOHAMED INIATH RAOOF, YUSUF DESAI CAPTAIN ENOCH, CONSTABLE SINGH and COLONEL DAWOOD kept on asking me where the whereabouts of the kidnapped victim. I was shown a photo of

S.B.
E.N.

myself where I was sitting at a restaurant while eating, but was early in November 2024 maybe 6 November 2024. I do not remember the exact date. I was then asked whether I know the man in the picture. There were two people, the other man being Juminho's. I answered, yes it is me. They then asked what I was doing there and I told them that we stopped at the restaurant to buy food from where I was to go and buy a bus. I was going to Durban to go and look for busses and for taxis, for instance a 32-seaters. They call it a Toyota Coaster and Toyota Quantum. I was coming to look and buy, because in Mozambique we are not allowed to come up with cash and buy the vehicles, because they are imported. You have to pay in Mozambique and then they deliver the vehicle/s from South African to Mozambique via truck. This is what I told them. They said that they saw that I was on the camera and I went to look at the bus, but they asked me why else I came to KwaZulu Natal, Durban, and specifically why I was at the restaurant in Overpoort. I could not answer them, because I did not know what they were talking about.

16. They accused me of buying airtime so that airtime could be used to phone and try and extort money out of the victim's family which I denied at the time and continue to deny.
17. They kept beating me and asking me for the whereabouts of the victim. I said I did not know, but they continued beating me and they were torturing me in my private parts, they manhandled me, they put scissors that one uses to cut the grass and poked me in the private parts. That was on Tuesday, 19 November 2024, where they got my phone, which was an iPhone. At first, I did not want to open my phone, because it has my private things on it, however I opened the phone because of the abuse. Initially, when I had refused to open the phone, I got choked, they put a plastic evidence bag with a hosepipe over my head and filled it with water. Eventually, after more than what felt like two hours, I opened my phone and they started to ask questions. At the time,

S B N
D N

they said *"tell your wife to tell her brother (with reference to Juminho) to release the victim."* I then phoned Naziah. The details of that conversation and the recording thereof, which has been transcribed, are reflected in the bail application which is already attached hereto. They phoned my wife and then threatened to harm me and send me back in pieces if she did not tell them where Juminho was. It was apparent that Juminho allegedly had something to do with the kidnapping, which I bear no knowledge of. As will be demonstrated in the bail application for the second complainant, a similar phone call happened where the accused phoned his wife and threatened her in much the same way the details of which are canvassed in the bail application which the State is referred to.

18. On 19 November 2024 and before I was taken to the Stanger Police Station Kwadekuza and subjected to further ill-treatment at that farm mentioned earlier, the second complainant was taken to Mpumalanga to show them where he was staying, which was at or near Samkeliso Honest Mlotshwa's house. During this time, they kept me at the place in Houghton, Johannesburg, where I was continuously subject to abuse. The following morning, 20 November 2024, the second complainant and myself were still being tortured intermittently until the early hours of the morning. They would hang me upside down and, at that point, it was very bad I thought that I was going to die and then they began to place the evidence bag with the hosepipe of water inside, so that I choke in and out of consciousness.
19. It is also important to note that I had two handsets that don't match the telephone calls made to the victim's family. I have also not been provided my property back and my legal representative has attempted to make various phone calls to Captain Enoch to obtain my property, namely the Mercedes Benz, which I will return to later, as well as my two cell phones on which we can see that those numbers, could not have been

S.B.
Gⁿ

matched the telephone calls made to the victim's family together with my watches and other affects, referred to hereinabove. That letter sent to Captain Enoch's email address and his Whatsapp is attached as **Annexure 4**.

20. Both myself and the second complainant were transported to Stanger, KwaDukuza, where we were transported in a white Huyndai H1, which I am led to believe is not a State vehicle but it belongs to a company of which Mr Desai is a director of, called Extreme Defence. As it stands now, the State allowed myself to be transported in a private vehicle, not only a private vehicle, but a vehicle which belonged to the family of the alleged kidnapped victim.
21. When I was tortured, it was by the Police and civilians of Vision Tactical and Mr Desai, who can be heard speaking on the audio. The audio is referred to in the bail application between the Police, myself and my wife where they threatened to send me back in pieces if she did not tell them where Juminho was.
22. At present, I do not have the medical records. I am still waiting for them to be released from Westville Prison to substantiate the injuries that I had, but as can be seen on the attachment, referred to in the bail application, being colour photos of the injuries that I sustained. Even at my first appearance where I took my shirt off in Court the Magistrate was shocked and that is, I think, the reason why I was sent to Westville Prison. These injuries were sustained when I was booked out of Stanger Police Station with the knowledge of all of the accused who are named in this statement to a farm where I was subjected to more torture and abuse by those present, being Captain Enoch, Constable Ndlovu, Yusuf Desai, Colonel Dawood Singh, Raoof, Colonel Govender and Nhlanhla Lucky Mkhwanazi. Even Samkeliso Mlotshwa was tortured with us where at

S.B.
B

the time Mr Mkhwanazi said that Mr Mlotshwa ought to have committed suicide, because this is Natal.

23. After the withdrawal of charges against me, on 22 January 2025, I went straight to the Stanger Police Station -Kwadekuza where I attempted to collect our possessions, being our wallets, our bank card/s, our identity documents and our passports, but we were unable to because I was never issued with a SAP13 slip by Captain Enoch, who was, despite assurances to my legal representative at Court, not available to sign the SAP13 register at Stanger Police Station to enable us to collect our possessions, which also included my cell phones. Further telephone calls have been attempted to Captain Enoch directly but, save for one instance where my legal representative did get hold of him and was furnished with his email address, further attempts have been unsuccessful in reaching him to try and restore my property. I reserve my civil rights in civil action in this regard.

24. That is the property of mine that should be at the Stanger Police Station. I also had my Midstream house raided by the Hawks, without a warrant, and my daughter was ill-treated and manhandled as was my wife, who was also unlawfully and with out a warrant taken to Stanga Police station – Kwadekuza where she was never charged and then eventually released we can at a later stage provide the SAP14 in this regard. The accused removed my safe and caused some damage as I had mentioned as well as my Mercedes Benz which was taken in Johannesburg as well as the R18 000.00 cash which was in file folder with the car papers, etcetera, have also not been returned to me. Neither has my son's computers and laptops or my wife's R35 000.00 (Thirty Five Thousand Rand) Rolex watches and jewelry be returned. At the Police Station where the vehicle was meant to be stored, Sergeant Monama (who can be contacted on 064 958 4445) stated that the vehicle was not logged into the system on 19 nor 20

S.B
B7

November 2024. The SAP 13 number was not recorded at the premises (vehicle identification and safeguarding JHB) on these dates or any other date. Sergeant Monama said that a search of the registration number revealed that the vehicle was impounded on the 22 December 2024 and that the SAP 13 number 987-2024 reflects that the vehicle was held at Alexander Road, Pietermaritzburg where the details on the system indicate that there is a statement on the circumstances surrounding its impound and that the vehicle was found abandoned by the SAPS and was reported as being burned out. This in itself is quite shocking, because at the time after I was arrested in that vehicle that vehicle was in and around Houghton, as can be seen by the LPR footage, which I have already demonstrated was last seen at or near Vision Tactical. The only conclusion I can draw from this is that the accused maliciously damaged my property and have tried to conceal the evidence pertaining to my arrest. I have proof that I bought the car from Woodmead Auto, as already mentioned herein.

25. As mentioned, none of my property or person was entered into the SAP 13 of any Police Station exercising jurisdiction in relation to area.
26. As can be seen from my bail application my previous legal representative was also assaulted.

FINAL PLEA

27. To the South African police Services. To assist me in the criminal matter and to take into consideration all of the above stated facts and proof thereof as per the documents of records attached. If further information is needed from me in substantiation or clarification of the above. Then the relevant police official is requested to contact my

SB
BN

legal representative so that the necessary arrangements can be made. I can identify all those whom i have made accusations against.

ESMAEL MAULIDE RAMOS NANGY

I HEREBY CERTIFY THAT THE DEPONENT HAS ACKNOWLEDGED:

- (a) he knows and understands the contents of this affidavit;
- (b) he has no objection to taking an oath;
- (c) he considers the oath to be binding on his conscience.

THUS, signed and sworn before me, at _____ on this the ____ day of **FEBRUARY 2025**, the Regulations contained in Government Notice No. R1648 of 19 August 1977 (as amended) having been fully complied with.

COMMISSIONER OF OATHS

FULL NAMES:
BUSINESS ADDRESS:
DESIGNATION:
AREA / OFFICE:

Selafine Pereira de Costa Brites




REPUBLIC OF SOUTH AFRICA

LARGE SHEET

Make an X in the appropriate block

Case No. A2190/24 Date

Review Case No. Date

Police station <u>KwDulenge</u>	CAS/OR/MAS/MR No. <u>230/09/2024</u>	Investigation officer <u>Capt Enoch</u>
District/Division <u>Ilembe</u>	Place of trial <u>KwDulenge District A</u>	Date of first appearance <u>22/11/2024</u>

Particulars of court officials must be furnished on the minutes of proceedings.

THE STATE VERSUS :

Particulars of accused

Name	<u>ESMAE Maulide Romas. Nanyu</u>				
Address	<u>1 B Marleborn Estate, Centurion, Gauteng</u>				
Male	☒	Female	☐	Nationality	<u>Mozambican</u>
Age	<u>51 yrs</u>				
*In custody	☒	On bail	☐	Warned	☐
Date of arrest	<u>2</u>	<u>0</u>	<u>2</u>	<u>4</u>	<u>1</u> <u>1</u> <u>2</u> <u>0</u>
Name	<u>Stefane Pereira Da Costa Brites</u>				
Address	<u>House No 20, Orkido Road, Primrose, Johannesburg</u>				
Male	☒	Female	☐	Nationality	<u>South African/Mozambican</u>
Age	<u>57 yrs</u>				
*In custody	☒	On bail	☐	Warned	☐
Date of arrest	<u>2</u>	<u>0</u>	<u>2</u>	<u>4</u>	<u>1</u> <u>1</u> <u>2</u> <u>0</u>

(hereinafter called the accused) charged with the offence(s) as set out in Annexure(s) A to as attached.

Plea (Date)

Judgement

Sentence on

20.01.25

Date

Magistrate

Date of appointment to the rank of Magistrate

Direction with regard to revision of sentence

Direction with regard to filing of case record

CLERK OF THE COURT

Private and confidential KOUR
KwDulenge 4450

2025-01-22

KLERK VAN DIE HOF



ADDITIONAL ACCUSED

3. Name/Naam : <u>Samkeliso Honest Mlotshwa</u>			
Address/Adres : <u>1384 Matsulu A, Nelspruit, Mpumalanga</u>			
Sex/Geslag <u>Male</u>	Nationality <u>South Africa</u>	Age/Ouderdom <u>39 yrs</u>	
* In Custody <u>X</u>	On Bail	Warned	Date of Arrest
In Hegtenis	Op Borgtog	Gewaarsku	<u>2024-11-29</u> Datum van arres
4. Name/Naam :			
Address/Adres :			
Sex/Geslag	Nationality	Age/Ouderdom	
* In Custody	On Bail	Warned	Date of Arrest
In Hegtenis	Op Borgtog	Gewaarsku	Datum van Arres
5. Name/Naam :			
Address/Adres :			
Sex/Geslag	Nationality	Age/Ouderdom	
* In Custody	On Bail	Warned	Date of Arrest
In Hegtenis	Op Borgtog	Gewaarsku	Datum van Arrest
6. Name/Naam :			
Address/Adres :			
Sex/Geslag	Nationality	Age/Ouderdom	
* In Custody	On Bail	Warned	Date of Arrest
In Hegtenis	Op Borgtog	Gewaarsku	Datum van Arrest
7. Name/Naam :			
Address/Adres :			
Sex/Geslag	Nationality	Age/Ouderdom	
* In Custody	On Bail	Warned	Date of Arrest
In Hegtenis	Op Borgtog	Gewaarsku	Datum van Arrest
Sex/Geslag	Nationality	Age/Ouderdom	

ANNEXURE/AANHANGSEL ACase no/ Saak nr A2190/24
Count No/Aanklag nr 01

THE STATE versus/DIE STAAT teen

Esrae Malide Renee Nelly
Stefanie Pereira Da Costa Brito

(Hereinafter referred to as the accused/Hierina die beskuldigde genoem)

KIDNAPPING

THAT the accused ~~is~~ are guilty of the crime of Kidnapping

IN THAT upon the 10/09/2024 and at or
 near Rwodziwa in the
 District/Regional Division of Ilaka
 and intentionally deprive Zakaria Desai, the accused did unlawfully
 of his/her freedom of movement by means of restraining him and forcing him
into a vehicle during Friday mask, the accused are part of
a syndicate and acting in concert in the furtherance of a common purpose

MENSEROOF

DAT die beskuldigde(s) skuldig is aan die misdaad van Menseroof

DEURDAT op of omtrent die _____ en te of naby
 _____ in die Distrik/Streekafdeling van
 _____, die beskuldigde(s) wederregtelik en opsetlik vir
 ontneming het deur _____ van sy/haar die vryheid van beweging

ANNEXURE TO CHARGE SHEET

COUNT NO. 02CASE NO. A2490/24THE STATE
versus.Esmad Maulide Ramus Nony + Another
(hereinafter called the accused)

The accused is guilty of the crime of

EXTORTION

In that on or about 17/09/2024 and at or near
KwaDukuze in the District of
Ilembe / Regional Division of KwaZulu/Natal, the accused did
 unlawfully and intentionally induce or subject to pressure or inspire fear in the mind of
Yusuf Desai by

informing him that his son Zakariyah Desai was being held
 captive and will be killed unless a ransom in the amount
 of R35 000 000-00 is paid for his release

and did then by means of the said threat,
 inducement or pressure, obtain or attempt to obtain an advantage not due to him / her, to
 wit

to attempt to raise the funds of R35 000 000-00 in
 order to get the accused to release the victim. The accused
 are part of a syndicate operating in concert in the furtherance
 of a common purpose

ANNEXURE/AANHANGSEL A

Case no/ Saak nr A 2190/24Count No/Aanklag nr C3

THE STATE versus/DIE STAAT teen

Esmiel Mulide Ruyos Nangy + Others

(Hereinafter referred to as the accused/Hierna die beskuldigde genoem)

ATTEMPTED MURDER

are
 THAT the accused is guilty of the crime of Attempted Murder

IN THAT upon or about 10/09/2024 to date and at or near
an unknown location in the Regional Division of KwaZulu Natal the accused
 did unlawfully and intentionally attempt to kill Zakariya Desai a female/male
 person, striking him with a cane and/or sjambok type instrument by
repeatedly over his entire body inflicting grievous bodily harm. The
accused acted in concert and as part of a syndicate in the
furtherance of a common purpose.

ANNEXURE/AANHANGSEL _____

Case no/ Saak nr _____
 Count No/Aanklag nr _____

THE STATE versus/DIE STAAT teen

Esmael Mawliche Roman Nangy
Stefane Pereira Da Costa Brito

(Hereinafter referred to as the accused/Hierna die beskuldigde genoem)

KIDNAPPING

THAT the accused is/are guilty of the crime of Kidnapping

IN THAT upon the _____ and at or
 near _____ in the
 District/Regional Division of _____, the accused did unlawfully
 and intentionally deprive _____
 of his/her freedom of movement by means of _____

MENSEROOF

DAT die beskuldigde(s) skuldig is aan die misdaad van Menseroof

DEURDAT op of omtrent die _____ en te of naby
 _____ in die Distrik/Streekafdeling van
 _____, die beskuldigde(s) wederregtelik en opsetlik vir
 _____ van sy/haar die vryheid van beweging
 ontnem het deur _____

DUPLICATE



J15 (81/801118)

REPUBLIC OF SOUTH AFRICA

CHARGE SHEET

* Make an X in the appropriate block

Police station <u>Kwa-Dukuza</u>	CAS/CR/MAS/MR No. <u>230/09/2024</u>	Case No. <u>A2190/24</u> Date
District/Division <u>Heath</u>	Place of trial <u>Kwa-Dukuza</u>	Review Case No. Date
		Investigation officer. <u>Dlcopt Enoch</u>
		Date of first appearance <u>2024/11/22</u>

Particulars of court officials must be furnished on the minutes of proceedings.

THE STATE VERSUS

Particulars of accused

Name <u>Esmael Mausile Ruvio Nangy</u>			
Address <u>13 Marleborn Estate, Centurion, Gauteng</u>			
Male ☒	Female ☐	Nationality <u>Mozambican</u>	Age <u>51</u>
*In custody ☒	On bail ☐	Warned ☐	Date of arrest <u>20112024</u>
Name <u>Stefane Pereira Da-Costa Brites</u>			
Address <u>20 Olander Road, Primrose, Johannesburg</u>			
Male ☒	Female ☐	Nationality <u>Mozambican</u>	Age <u>57</u>
*In custody ☒	On bail ☐	Warned ☐	Date of arrest

(hereinafter called the accused) charged with the offence(s) as set out in Annexure(s) A to as attached.

Plea (Date)
.....
.....

Judgement (Date)
.....
.....

Sentence on
.....
.....
.....
.....

Date

Magistrate

Date of appointment to the rank of Magistrate

Direction with regard to revision of sentence

Direction with regard to filing of case record

ANNEXURE TO CHARGE SHEET

COUNT NO. 2

CASE NO. _____

THE STATE
versus

Esmiel Mawide Nangy + 1
(hereinafter called the accused)

The accused is guilty of the crime of

EXTORTION

In that on or about _____ and at or near
_____ in the District of
_____/ Regional Division of KwaZulu/Natal, the accused did
unlawfully and intentionally induce or subject to pressure or inspire fear in the mind of
_____ by

_____ and did then by means of the said threat,
inducement or pressure, obtain or attempt to obtain an advantage not due to him / her, to
wit

ANNEXURE/AANHANGSEL _____

Case no/ Saak nr _____
Count No/Aanklag nr 3THE STATE versus/DIE STAAT teen
Esmail Maulide Ramas Nany + 1(Hereinafter referred to as the accused/Hierina die beskuldigde
genoem)**ROBBERY WITH AGGRAVATING CIRCUMSTANCES AS INTENDED
IN SECTION 1 OF ACT 51 OF 1977**THAT the accused is/are guilty of the crime of Robbery with aggravating circumstances
(read with the provisions of Section 51(2), 52(2), 52A and 52B of the Criminal Law
Amendment Act 105 of 1997)IN THAT upon or about _____ and at or near
District/ Regional Division of _____, in the
unlawfully and intentionally assault _____, the accused did
and did then and with force take the following items from him/her, to wit

his/her property or property in his/her lawful possession, aggravating circumstances being

FIRST APPEARANCE SHEET

Annexure A

Case number: _____

STATE VS _____

Accused before Court

1. Rights with regard to Legal Representation explained.

2. Accused elects: Accused 1 _____

Accused 2 _____

Accused 3 _____

Accused 4 _____

3. The right to bail and the provisions of section 60(11) B explained. Accused indicates he/she/they understand and elects to:-
 3.1 apply for bail
 3.2 not to apply for bail.

3.1 Accused discloses the following previous convictions/pending charges in terms of section 60(11) B: See Annexure B
 3.2 Accused discloses no previous convictions or pending charges

4. Accused linked to the offence: _____

5. State opposed to bail/ not opposed to bail, State deems this a schedule _____ offence. Defense agrees/do not agree

6. 6.1 State requires bail be set

6.2 Matter adjourned for Bail investigations in terms of section 50(6) of the Criminal Procedure Act 51 of 1977.

7. Accused in custody and matter adjourned to _____ for

Setting of Bail

8. Accused personal details

9. Bail set in the amount of

10. Bail conditions:

10.1

10.2

10.3

11. Matter adjourned to

for

12. Accused in custody: If bail is paid the Accused is warned for

court.

8h30 on:

warned for:

or Accused released on warning and

Court 08h30 on:

B van ZEDEN

DATE:

Annexure B

Case number

ACCUSED NAME:

PREVIOUS CONVICTIONS

OFFENCE	COURT	YEAR	SENTENCE

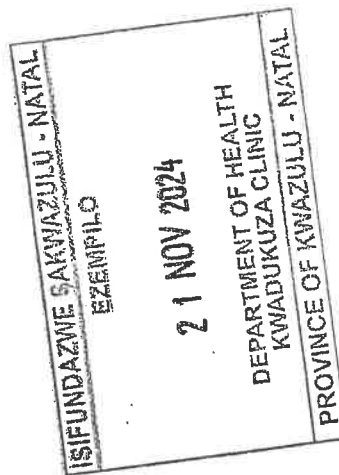
XXXXXXXXXXXXXXXXXXXX

PENDING CHARGES

OFFENCE	COURT	ON BAIL/IN CUSTODY	NEXT APPEARANCE DATE

Assault
KOC
Steph Perenn de Castro
Brith

661219



KWAZULU - NATAL PROVINCIAL ADMINISTRATION - KWAZULU - NATALSE PROVINSIALE ADMINISTRASIE

Ward / Sal

Male Surgical
General Jacky Greyse
Umanza Regional
Hospital

I.P. No./B.P. Nr

HOSPITAL / HOSPITAAL

22/12/2022

H 159858

Re / Insake

Decoste Stefane. [661219]

Herewith report on the abovenamed patient who was sent to hospital on 22/11/2022 by

Aangeheg is 'n verslag oor bogenoemde pasiënt wat op na di hospitaal gestuur is.

Report / Verslag:

Please kindly note that the above mentioned person is currently admitted in ward of facility here on the 22nd of November 2024. He will therefore not be able to attend to court today.

Sincerely,
[Signature]
MBCHE
UP0881302

ISIFUNDAZWE SAKWAZULU - NATAL

EZEMPILO

2024 - 11 - 22

DEPARTMENT OF HEALTH
GAMA REGIONAL HOSPITAL
OPD CLERKS

PROVINCE OF KWAZULU-NATAL

AF

ike

e

ic

ic

ic

ANNEXURE/AANHANGSEL _____

Case no/ Saak nr _____

Count No/Aanklag nr _____

THE STATE versus/DIE STAAT teen

Esmael Mawlidie Romani Nangay
Stefane Pereira Da Costa Brito

(Hereinafter referred to as the accused/Hierna die beskuldigde genoem)

KIDNAPPING

THAT the accused is/are guilty of the crime of Kidnapping

IN THAT upon the _____ and at or
 near _____ in the
 District/Regional Division of _____
 and intentionally deprive _____, the accused did unlawfully
 of his/her freedom of movement by means of _____

MENSEROOF

DAT die beskuldigde(s) skuldig is aan die misdaad van Menseroof

DEURDAT op of omrent die _____ en te of naby
 _____ in die Distrik/Streekafdeling van
 _____, die beskuldigde(s) wederegterlik en opsetlik vir
 ontnem het deur _____ van sy/haar die vryheid van beweging

DATE: ~~29/11/2024~~ 02/12/2024
 PRESIDING OFFICER: MS. Van Eeden
 PROSECUTOR: MS. Dlamini / Mr. Ndlovu
 DEFENCE: Ms. Yaka
 INTERPRETER: MS Mxhosa

CASE NO: A 2170/2020

Acc 3 Added today - Arrested
 on 29/11/2024 at the Border
 between SA & Mozambique.
 Rafts explained - Accused
 about his own A.H.
 wish to apply for bail. Indicated
 after S 60(1)(B) were expi - NO
 PC, NO Pending Charges.
 State opposed. Making an Application
 i.t.o Sec 50(6) - Schs.
 Adj to 4/12/2024 for DPP for
 Investigations relating to the Dependant
 of Acc to SA. from Mozambique.
 Acc 710. (Kwadolukwana, (Ellis))

MAGISTRATE

MAGISTRATE	
DATE	
Private Bag X802, Stanger 4458	
	2024-12-02
	
FIVE	
STANGER MAGISTRATE'S COURT	

SUID-AFRIKAANSE POLISTIEDIENS



SOUTH AFRICAN POLICE SERVICE

Privaatsak/Private Bag
Posbus/Post Office x 10659

Verwysing Reference	KWADUKUZA CAS 230 / 09 / 2024
Navrae Enquiries	Col MB Mazibuko
Telefoon Telephone	(032) 551 8200
Faksnommer Fax number	(032) 551 3405
E-Mail	MazibukoM2@saps.gov.za

OFFICE OF THE SECTION
COMMANDER
DETECTIVE SERVICES
S.A. POLICE SERVICE
KWADUKUZA
4450

DATE: 2024 / 12 / 02

THE SENIOR PUBLIC PROSECUTOR
KWADUKUZA MAGISTRATES COURT
ILEMBE DISTRICT

REQUEST FOR REMAND OF PRISONERS TO POLICE CELLS: KWADUKUZA SAPS.
KWADUKUZA CAS 230 / 09 / 2024
CHARGE: KIDNAPPING, Armed Robbery
INVESTIGATING OFFICER: CAPTAIN A. ENOCK

1. Please remand the following accused/s back to KwaDukuza Police Cells for further investigation/bail investigation

Accused 1: SAM KÉISO HONEST MLOTSHWA
Accused 2: _____
Accused 3: _____
Accused 4: _____
Accused 5: _____

2. Reasons:

2.1. Bail (Intestigation)

2.2. Recover Victim

3. Your co-operation is highly appreciated.

MB Mazibuko CAPT : COLONEL
DETECTIVE SECTION COMMANDER: KWADUKUZA SAPS
Date: 2024 / 12 / 02

CASE NO: A2190/24

DATE:

4 DECEMBER 2024

PRESIDING OFFICER:

MS B VAN EEDEN / Ms Mthiyane

PROSECUTOR:

MR B. MBHAMALI / Mr Nel

DEFENCE:

MS YAKA

INTERPRETER:

MS MXHOSA

Acc 3 hours on

PP: Dangerous by DPP

Have been down

Bail still open

by one

Acc not mess

to reach his 9th

Ady to 09/12/2024 F

appear at the court

Acc MC - To be done
in the Police Cells

MAGISTRATE:

DATE

MAGISTRATE	
PRIVATE BAG X602	
2024-12-04	:
REMARKS	
LAUDENCE	

On 09 December 2024 in KwaDukuza District Court A

Case No: A2190/2024

PO : Mr Mchunu
PP : Adv Nel
Int : Ms Mthembu
Def : Mr K Tirivanhu - Accused 1 + 2

Accused 3 -

The three before court
pp: Mr Amos 1's co. for
accused 1 + 2 and
Mr Tirivanhu was not
represented. As attorney
on record. Amos
3 about where the
attorney yet.

Court: Suggest was all 3
yet the attorney &
Mr Tirivanhu to withdraw
as attorney on record.

Adj to 11/12/2024 for
attorney of all 1 + 2 to
withdraw as attorney on
record. All three, in
custody. Returned KOP
police cells

11/12/24

SUID-AFRIKAANSE POLISIEDIENS



SAP 21

SOUTH AFRICAN POLICE SERVICE

 Privaatsak/Private Bag
 Posbus/Post Office Box X 10659

 Verwysing
 Reference

 Navrte
 Enquiries

 Telefoon
 Telephone

 KWA DUKUZA CAS
 COL T MGWABA

230-09-2024

(032) 5518200

 Faksnommer
 Fax number

(032) 5513405

 OFFICE OF THE BRANCH
 COMMANDER
 S.A. POLICE SERVICES
 KWA DUKUZA
 4450

2024/12/09

 THE PUBLIC PROSECUTOR
 MAGISTRATE COURT
 KWADUKUZA

 REMAND OF PRISONER(S) TO POLICE CELLS SAPS KWADUKUZA
 KWADUKUZA CAS

CHARGE

/OFFICER

 1. Please remand the following accused back to kwaDukuza Police Cells for
 further investigation

Accused 1 : ESTHAEL MAULIDE RAMOS NABBY

Accused 2 : STEFANE PEREIRA DA COSTA BRITES

Accused 3 : SAMKELE MLOTSIWA

Accused 4 :

Accused 5 :

2. Reasons : BAIL INVESTIGATION

FURTHER INVESTIGATION

: Recover victim

F/STATION COMMISSIONER : SAPS KWA DUKUZA

Case No: A2190/2024

On 11 December 2024 in KwaDukuza District Court A

PO : ~~Ms Sepeng~~ / Mr Mchunu

PP : Mr Nel

Int : Ms Mthembu

Def : Mr. Lombard

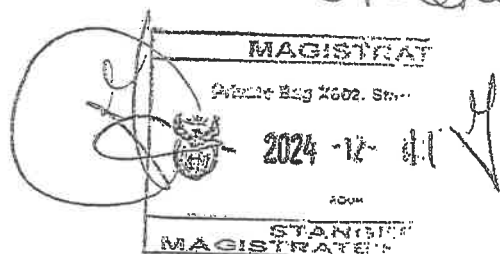
AU ~~Accused (all 3)~~ before court 1/c,
~~Accused 1 & 2~~ represented by
 Mr. Lombard, instructed by
 Nadd Nadeem Mohamed Idr. Boun
 Jhb.

PP: Postponed to 17/12/2024
 for formal bail application.
 B Ad remanded 1/c into Westville
 Prison.

Def: Request that all accused be
 detained at Westville prison,
 and that members of SAPS
 should refrain from
 interrogating the accused,
 without the presence of their
 legal representatives.

Ordered as prayed!

Siswati interpreter required
 for accused 3.



IN THE MAGISTRATES COURT FOR THE DISTRICT OF KWADUKUZA
HELD AT ILEMBE

CAS No: 230/09/2024
CASE No: A2190 /2024

In the matter between:

THE STATE

And

ESMAEL MALIDE RAMOS NANGY

1st ACCUSED

STEFORO PAREIRA da COSTA BRITES

2nd ACCUSED

NOTICE OF WITHDRAWAL AS ATTORNEYS OF RECORD

BE PLEASED TO TAKE NOTICE that PHORA ATTORNEYS hereby withdraw as Attorneys of Record for both Accused in the aforementioned criminal matter.

KINDLY FURTHER TAKE NOTICE THAT both accused last address is known as 1B Marleborn Estate, Centurion, Pretoria, Gauteng Province and a copy of this notice was sent to both accused

DATED at PRETORIA on this the 10th day of DECEMBER 2024.

(sgd. O PHORA)

PHORA & ASSOCIATES INC. ATTORNEYS
ATTORNEYS FOR 1 & 2 ACCUSED
1430 CROCOSMIA STREET
CENTURY MANOR
PRETORIA
TEL: 082 858 7618
e-MAIL: parabile@pa-inc.co.za

TO: THE CLERK OF THE ABOVE HONOURABLE DISTRICT COURT
ILEMBE

(ELECTRONICALLY SIGNED AND SERVED)

G.P.S. 01/02

A 2
 Su Esme
 Wain
 P. 21 (81/143)
 & Otis

17. 12. 2024

P/O : Mr Jephery

PP : M. V. Mthambo

DO : Adv. Volmarani

Acc 1 not present.

Acc 2 + 3 before court.

Proceeding mechanically recorded

PP: counsel for the 3 accused has been man-handled before he attended or came to the building. Accused 1 also not present. If so would we didn't respond to his name in prison. Request matter be postponed to 27/12/2024 for accused 1 to be requisitioned and for attorney all accused

R/W to 27/12/24 for all 1 to be requisitioned and for attorney (all accused)

17.12.24

ON

27/12/2024

CASE NO: A2190/24

PRESIDING OFFICER MS Mahayle / Mr. MchunuPUBLIC PROSECUTOR MS Mlamaili / Ms. S. Siveressod

INTERPRETER

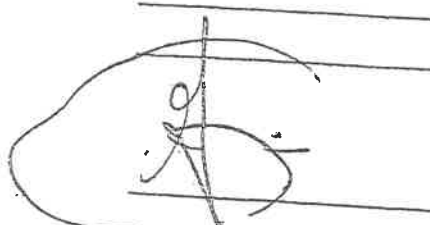
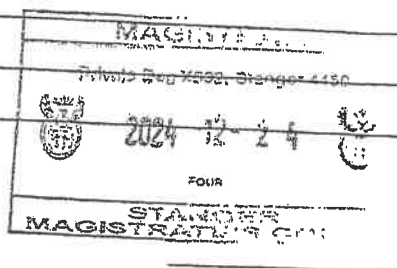
Ms. Mthembu / Mr. Marenghula / Mr. Nkomo

DEFENCE

MS Mkhwenza / Adv. E. ArangeriAbdu 3 accused before court 1/C.

PP. I'm in possession of a Notice of
 Withdrawal as attorneys of record
 from Nadeem Mohamed I/C. Adv
 R. Arangeri. (first account Adv is
 before court. State is still going to add another
 count of robbery - Therefore bail will be to Sch 1
 postponed to 22/01/2025 for bail
 application. All 1/C at Westville
 prison.

Date arranged with both Mr. Marenghula (Portg)
 and Mr. Ncampholala (Siswati)


 MAGISTRATE


DATE

ON: 22/01/2025

CASE NUMBER A 2190 / 24

PRESIDING OFFICER : MS VAN EEDEN R. SEPENG
PROSECUTOR : MS MURUGAS / MR. M. NAIDUINTERPRETER : S/A

DEFENCE

: MISS YAKA /

ACC 192 - MR. R. ARCHANGELI
ACC 3 - MR. CS MATHOCHOAAll three accused appearing
court.

Pr. interrogatories charged

ind - all 3 accused.

Mr Archangeli - NO objection

Mr MATHOCHOA - NO uCharges introduced in to.
all (3) accused.

MAGISTRATE

22. 01. 25.

IN THE MAGISTRATES COURT FOR THE DISTRICT OF ILEMBE

HELD AT KWADUKUZA

CASE NO.: A2190/2024

In the matter between:

ESMAEL MAULIDE RAMOS NANGY

1st Applicant /accused No.1

SETEFANE PEREIRA DA COSTA BRITES

2nd Applicant / accused No.: 2

SAMKELISO MLOTSHWA

3rd Applicant / accused No.: 3

and

THE STATE

Respondent

In re the matter between

THE STATE

and

ESMAEL MAULIDE RAMOS NANGY

1st Accused

SETEFANE PEREIRA DA COSTA BRITES

2nd Accused

SAMKELISO MLOTSHWA

3rd Accused

**SUPPLEMENTARY AFFIDAVIT IN SUPPORT OF APPLICATION FOR BAIL
IN TERMS OF THE PROVISIONS OF SECTION 60(11) OF
THE CRIMINAL PROCEDURE ACT, NO. 51 OF 1977 (as amended)**

KFV

E-n

I, the undersigned,

ESMAEL MAULIDE RAMOS NANGY

do hereby make oath and say that:

1. I am the first accused and my full particulars appear at paragraph 1 of the affidavit deposed to by me on 9 December 2024, to which will refer to in detail later on in this affidavit. It is attached here to as Annexure "A1". My legal representative will have color photos, where available of the pictures of the injuries sustained by me that appear as annexures to A1 at the hearing of the matter which I would request the Honourable Court to have regards to.
2. The facts contained herein are within my personal knowledge and are both true and correct, save where I indicate otherwise, or it is apparent from the context herein.
3. Submissions made are on the advice of my legal representative which advise I accept as correct.

purpose of this affidavit

4. In this affidavit I seek to supplement the allegations I make in my affidavit entitled *"affidavit in support of an application for bail in terms of the provisions of Section 60(11) of the Criminal Procedure Act, 51 of 1977 (as amended)"* (*"the main affidavit"*) which I deposed to on 9 December 2024. The main affidavit has not been served on the State or submitted to court and it was prepared by my previous legal representative.

KEV

KEV

5. I respectfully contend that the Honourable Court should take judicial notice of the fact that my previous legal representatives were manhandled outside court on previous occasions, which resulted in my current legal representative coming on record on 27 December 2024, following the withdrawal of my previous legal representative and the reason why the main affidavit was not produced in court.
6. At the hearing on the 27 December 2024 the matter was then postponed until 22 January 2025 for purpose of bail.
7. Although being furnished with the main affidavit before the 27 December 2024 by my previous attorney, my new legal representative had not personally consulted with me or had the opportunity to specifically consult with me in relation to the terms as deposed to in my main affidavit.
8. After various interactions following 27 December 2024 with my legal representative, it was determined that there is further information that ought to be brought to the attention of the Honourable Court to substantiate why it is in the interest of justice and that there are exceptional circumstances which permit my release on bail.

State's case against me

9. I have been advised, which advice I accept to be correct, that in order to successfully challenge the merits of the State's case against me in bail proceedings, I must prove on a balance of probabilities that I would be acquitted of the charge. I do this while being advised that for purpose of bail the court is not *per se* concerned with whether or not I am guilty that question being left to the trial court.

AV

E-7

10. It respectfully submit that I will be acquitted of the charge levelled against me for the reasons set out hereinbelow, read together with what I have already stated in my main affidavit.
11. My legal representative will advance further legal argument on legal points that may arise herein at the hearing of my bail application should the need arise.
12. I pause to mention that the main affidavit presented to the Court is a true copy of the original that I signed. Unfortunately, my current legal representative is not in possession of the original, but I confirm that the copy, as presented, accords in every respect with the original.

States non-existent case against me

13. Although I wish to exercise my right to remain silent, what follows I submit will give the Honourable Court the context needed to justify my release on bail.
14. I have not had access to the police docket in order for me to ascertain what the States case is against me. I am advised that I would only be permitted access to the docket after the necessary investigations are complete and the matter is ready for trial.
15. I submit that even though I may not be entitled to access to the police docket I ought to still be afforded a reasonable opportunity to adduce evidence as to why I should be granted bail. For this purpose, and on 8 January 2025, my legal representative

RFV

E.7

sent a letter to the Prosecutor. The crux of the letter requested further particulars regarding the crimes that I am allegedly guilty of and in relation thereto, as to what allegedly happened and what I had alleged to have done in respect to what had happened. The purpose hereof was to seek information for my bail application.

16. This letter is attached hereto and marked **Annexure "A"**.
17. On 9 January 2025, the State replied. The essence of the reply was that the State allege that on 10 September 2024 Mr Z Desai was kidnapped and robbed of his wallet containing both cash and cards of a personal nature, such as but not limited to bank cards, identity cards and medical aid cards. During the said incident, the state alleges that firearms were wielded. Subsequently, ransom was made for the release of Mr Desai in the amount of R35 000 000.00. The State alleged further that persons unknown to the State as well as myself (and the other accused) acted in furtherance of a common purpose to commit the aforementioned offences. In support hereof, the letter as received from the State is attached hereto and marked **Annexure "B"**.
18. On 10 January 2025 a letter was sent to the State, in reply to their letter of 9 January 2025, indicating that that letter did not contain the required particularity for my bail application and a request was made for the State to reconsider its position in order to limit the potential postponement and, by implication, any prejudice that I may suffer as a result of the State's failure to provide such particularity.
19. The letter of 10 January 2025 is attached hereto and marked **Annexure "C"**.

xlv

E-11

20. The State subsequently replied on the 14 January 2025 where the State informed my legal representative that I (as well as the other accuse) are active participants in the kidnapping of the victim and his continued unlawful captivity. This letter is attached hereto and marked **Annexure "D"**. I find this rather bizarre since how I could be an active participant if I am incinerated. In fact, I deny that allegation.
21. Thereafter, and in preparation for my bail hearing (on the 22 January 2025), on or about 17 January 2025, my current legal representative received the following documents from my previous legal representative:
- 21.1. Charge Sheet, incorrectly and purposefully indicating that the date of my arrest was on 20 November 2024, which is attached hereto and marked **Annexure "C"**;
- 21.2. Annexure A – Count 1 – kidnapping which is attached hereto and marked **Annexure "D"**;
- 21.3. Annexure to the Charge Sheet – Count 2 – Extortion which is attached hereto and marked **Annexure "E"**;
- 21.4. photos of a cell phone screen, which indicates that the voice recordings I referred to in the main affidavit were made on 19 November 2024. These are attached hereto and marked **Annexure "F"**;

HV

E-7

- 21.5. various "LPR" photos containing information pertaining to the location of my Mercedes Benz, with registration number BH 25 ST GP, which is attached hereto and marked **Annexure "G"**.
- 21.6. The audio recording referred to in my main application was also received but could not be opened however my legal representative was then subsequently forwarded by Whatsapp the said audio and I verify that this audio accords with what transpired. As far as i am aware the victim's brother was present and also can be heard in the audio.
22. I incorporate the content of each of these annexures as if specifically referred to.
23. What is apparent is that the Charge Sheet is dated 20 November 2024 which is not true, as the date reflecting my arrest. I was arrested on the 19 November 2024 where I was subject to the treatment that I describe in my main affidavit. In substantiation of this allegation, I refer the Honourable court to the Images from my wife's cell phone (**Annexure "H"**) which indicates that the recording that was taken, and referred to in paragraph 73 and Annexure "EN23" of my main affidavit, demonstrating that I was arrested on 19 November 2024.
24. I would request that the Honourable court listen to the audio (EN23) and when the Honourable Court listens, (main application ,paragraph 73, transcribed at Annexure "EN23"), the Honourable court will realise that the Police did not in fact think that I had taken the victim. In fact, if one listens to the audio, the impression is that they were trying to negotiate the victim's release with my own release. This is, with

H/V

E-1

respect in itself unlawful and constitutes extortion on the part of those police officers and other individuals involved as is a misconduct on their part.

25. As indicated in the main application there were various calls between the police and my wife.

26. As a side note, my medical records evidencing the brutality that I have subjected to have been requested, but at the time of this affidavit have not yet been received. As at the time of this affidavit I am experiencing problems with my ear where water was forced into it by the police and where they would at close range discharge their weapons during the ordeal which is more fully set out in the main affidavit. In substantiation hereof, I refer the Honourable Court to Annexures "H" and "I". The Honourable Court would appreciate the buracrassy that is faced when requesting such records in these circumstances. *This happened on the 14/12/2024. N.V.*

27. Returning to the issue pertaining to my arrest, the LPR (Annexure G) photographs shows that I left Midstream on 18 November 2024 and that my car was taken during the arrest between 19 and 20 November 2024 in and around Norwood area in Johannesburg and a business called Vision Tactical. This is where, I think, I was tortured and where the audio between my wife and the authorities took place. *E-1*

when my legal representative presented this affidavit to me for signature he

28. *My legal representative* has shown me a printed copy of Vision Tactical's website where it appears that they have been involved in, what appears to be, multiple other incidents revolving around kidnapping where they say that they work closely with the authorities. While the articles do not seem to refer to this incident specifically the

reason why I mention it is because it shows that it is not farfetched for me to allege,

When I read through Annexure "J" I recognised the picture of one of my assailants being Yaseen Tleby of Vision tactical

N.V.

N.V.

E-1

As is demonstrated by the VPR footage as well as the screen of the cell phone taken by my wife, that I was held there and subject to the brutality already canvassed in my main application at a "black site".

29. In this respect the procedure relating to arrest was not followed as I was not presented with a warrant of arrest or brought to court within 48 hours of my arrest.

30. I attach hereto a copy of an extract from the website of Vision Tactical printed from their website, marked as Annexure "J".

31. The above unlawful arrest is in violation of my rights and a gross infringement of my constitutional rights. Further legal argument will be presented at my hearing in this regard, should the need arise, but I have also instructed my legal representative to lay the necessary complaints to:

31.1. IPID;

31.2. the Public Protector;

31.3. the National Commissioner for Police; and

31.4. the Human Rights Commission.

32. I do not attach these letters to this application because I do not want to unnecessarily burden the court papers but the letters will be made available (if these letters have been sent at the time of hearing) at the bail application hearing of this matter.

16/12

D-1

33. The inference is that the Police knew that I did not have anything to do with the kidnapping, but they thought that my wife's brother did and that they were trying to extort that information from my wife, under threat of my own physical bodily integrity which is clearly on the recording.
34. I respectfully submit that what can be heard on the recording does not tally up to the charges as the state now appears to allege against me. Which I also understand from my last appearance the State wants to add a further charge of robbery with aggravating circumstances.
35. At the time of deposing to this affidavit the State has not furnished me with any particularity on why they are going to oppose bail.
36. The impression that I have and which I submit is the only inference that the court can draw is that my continued detention is a form of anticipatory punishment.
37. As a last point to substantiate this, it is clear that the State is attempting to put a "migrating version" on my involvement in this whole ordeal. For instance, Annexure A, in respect of Count 1, indicates that the I and accused number 2 are guilty of kidnapping in that upon the ^{11th September 2024} 10th of November 2024 and at or near Kwadukuza in the district Regional Division of Ilembe that we did unlawfully and intentionally deprive ^{B-1} Zakaria Desai of his freedom of movement by means of restraining him and forcing ^{11th} him into a vehicle during Friday mosque, the we are part of a syndicate and acting in the furtherance of a common purpose.
38. Then, on Count 2 which is also an Annexure to the Charge Sheet, it is alleged that that on or about the 17th November 2024 and at or near Kwadukuza in the district of

11

B-1

Ilembe Regional Division of KwaZulu-Natal that I (and accused number 2) did unlawfully and intentionally induced or subject pressure or inspire fear in the mind of Yusuf Desai, by informing him that his son Zakaria Desai was being held captive and will be killed unless ransom in the amount of R35 000 000.00 is paid for his release and then did then by means of the said threat induce or pressure, obtain or attempt to obtain an advantage not due to him/her to attempt to raise the funds of R35 000 000.00 in order to get the accused to release the victim and that we are part of a syndicate going in concert in the furtherance of a common purpose.

39. I deny my cell phone or any cell phone that I own can be linked to any sort of demand and put the State to the proof thereof. My daughter Jessica also informs me that her aunties and her grandmother's phones were taken by the police (after they were also subject to appalling treatment) but none of those phones either "connect" me to any crime that i have been alleged to have committed.
40. As I have already stated the allegations, which seem to have morphed from my and the second accused direct involvement to that we act in the furtherance of a common purpose, but it would be noted from the audio that and with respect on a balance of probabilities the state will not be able to sustain such a charge against us. Against i reiterate I am still incinerated and deny any involvement or participation at all in the matter.
41. As mentioned, I intend to plead not guilty, and I will take the court into my full confidence. I am confident that I will be acquitted, and I will instruct my legal team after the States case is presented at trial to apply for a Section 174 discharge.

M S /

E-H

42. Lastly I disclose to the court that on I think the 10, 11, or 6 November 2024 I did ⁸⁻⁷ come to Durban but that was because I wanted to purchase a 32-seater ^{OLOSTON} Toyota ^{KEAT} Quantum for business purposes. Other than that, I wish to exercise my constitutional right to silence.

Why I should be granted bail

43. In addition to what I have stated in my main application.
44. With the exception of possibly Juninho who is a relative I do not know the identity of any of the witnesses and as such I will not intimidate or threaten any of the States witnesses. Additionally, I do not want anything to do with Juninho, so I undertake not to have anything to do with him.
45. My release on bail will not endanger public safety.
46. I will not commit any offence while I'm on bail.
47. I will not undermine the proper functioning of the criminal justice system.
48. My release on bail will not disturb public order or undermine peace and security.
49. My release on bail will allow me to take see what is happening with my business and to evaluate the damages that have occurred at my Midstream home.
50. I have been advised that the conditions of bail are within the discretion of the court, but my family has raised R10 000 ⁵⁻⁷ ^{14.4} for payment of bail.
51. I confirm that I have had no previous convictions, there are no pending charges against (including anything relating to harassment and domestic violence) and I confirm that I am not out on bail in respect of any other matter.

10/11

5-7

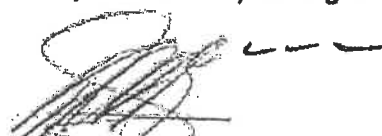
WHEREFORE I humbly request this Honourable Court to admit me to bail subject to the terms, conditions and amount that this Honourable Court in the exercise of judicious discretion, deems appropriate as exceptional circumstances exist that in the interests of justice warrant my release on bail.

E M RAMOS NANGY
ESMAEL MAULIDE RAMOS NANGY

I HEREBY CERTIFY THAT THE DEPONENT HAS ACKNOWLEDGED:

- (a) he knows and understands the contents of this affidavit;
- (b) he has no objection to taking an oath;
- (c) he considers the oath to be binding on his conscience.

THUS, signed and sworn before me, at Westville Prison on this the 21 day of **JANUARY 2025**, the Regulations contained in Government Notice No. R1648 of 19 August 1977 (as amended) having been fully complied with.


COMMISSIONER OF OATHS

FULL NAMES:

BUSINESS ADDRESS:

DESIGNATION:

AREA / OFFICE:

WESLEY VINCENT MEYER

Durban Westville Prison

Correctional Officer - C131-3

Durban Medium-A Charge Office

INVESTIGATION:
DURBAN REMAND DETENTION FACILITY
21-01-2025
PRIVATE BAG X1, DURBAN, WESTVILLE, 3630
CORRECTIONAL SERVICES

WV.

IN THE MAGISTRATE'S COURT FOR THE DISTRICT OF ILEMBE
HELD AT KWADUKUZA

CASE NO:

In the matter between:

THE STATE

VERSUS

ESMAEL MAULIDE RAMOS NANGY

1st APPLICANT

STEFANE PEREIRA DA COSTA BRITES

2ND APPLICANT

SWORN AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR BAIL, IN TERMS OF
THE PROVISIONS OF SECTION 60 (1-1) OF THE CRIMINAL PROCEDURE ACT 51
OF 1977, AS AMENDED

I, the undersigned,

ESMAEL MAULIDE RAMOS NANGY

do hereby make oath and state as follows:

B 7
Ncom

B 7

1. I am an adult male businessman of Mozambican descent with a valid permanent residence to reside in South Africa with a South African identification document.

2. The facts herein contained are within my own personal knowledge and belief and unless stated otherwise, and are both true and correct.

3. Where any statements made are of a legal nature, I submit that I make such statements on the advice of my attorneys of record.

PERSONAL DETAILS

4. I am an adult male of Mozambican descent, 51 years of age, and currently hold permanent residence in South Africa. A copy of my renewed identification document, which reflects my correct particulars, is annexed hereto and marked annexure "EN0".

5. I reside at 1B Marylebone Street, Old Kent Gate, Midstream, Centurion, a property which I own. The deed of transfer for this property is annexed hereto and marked as Annexure "EN1".

6. Supporting documentation, including a levies statement in my name and tax invoices from Midstream Electrical Supplies and the City of Ekurhuleni, are annexed hereto and marked as Annexures "EN2", "EN3", and "EN4", respectively.

6.4
N/A
5

E m

NSO

B-1

10/1

13. We aim to demonstrate to this Honorable Court that our continued detention is neither in the interests of justice nor warranted under the circumstances, given the exceptional violations of our constitutional rights and our commitment to stand trial of the charges against me.
12. This application is made to secure my release on bail pending the finalization

PURPOSE OF THIS APPLICATION

11. The Second Applicant is my brother-in-law, married to my sister Selma Brites, named Stefane Pereira Da Costa Brites ("Stefane").
10. I am the First Applicant.

THE PARTIES

9. We have three children: Rayhanne Esmael Nangy (12), Esmael Maulide Ramos Nangy Junior (11), and Jasmine Esmael Nangy (3). Additionally, I have a 26-year-old daughter, Jessica Nangy, from a previous marriage. All my children are resident in South Africa and consider South Africa to be there permanent and fixed address.
8. I am married to Naziah Nangy for approximately ten years. A copy of our marriage certificate is annexed hereto and marked as Annexure "EN5." Additionally, a copy of my wife's Mozambican passport is annexed and marked as Annexure "EN6."
7. I have owned this property for the past eight years and am heavily invested in the Republic of South Africa.

3.7
1.1.1
5.1

11

CIRCUMSTANCES OF ARREST

17. I have been informed that I am to be charged with offenses related to alleged kidnapping.
18. I intend to plead NOT GUILTY to all charges, as I maintain that I have no involvement in the alleged crimes.
19. My legal representatives are preparing a robust defence, and I fully intend to stand trial to clear my name.

CHARGES AND ALLEGATIONS

16. I am the sole breadwinner for my family, which includes my wife, children, and extended family members who solely depend on me for their livelihood.
15. I am employed by Transnangy Ltd in Mozambique, earning a monthly salary of approximately R57,000.00. I also am a director and employee of Transnangy (Pty) Ltd in South Africa.

EMPLOYMENT AND FINANCIAL CIRCUMSTANCES

14. The purpose of this affidavit is to provide the court with sufficient information regarding personal circumstances, the conditions of arrest and detention, and the reasons why release on bail is justifiable and appropriate, and in the interests of justice.

20. Photographic evidence of the injuries I sustained during the assault and torture is attached hereto as Annexures "EN7" to "EN21".

21. Additional evidence, including phone call recordings and transcripts detailing the threats and coercion imposed on my family, are annexed as "EN23". This evidence will be used to elaborate and prove what I intend to set out below being the circumstance of arrest and subsequent detention.

22. Myself and Stefane, further referred collectively herein as "We" and / or "Our" have been and remain so detained at the facility of the Second Respondent albeit, currently in and out of hospital, since Tuesday the 19th of November 2024.

23. The full and further details of our arrest and detention as well as our medical conditions will be elaborated upon hereinunder.

24. By way of background to this arrest, I submit as follows:

UNLAWFUL ARREST, TORTURE AT SECURITY BLACK SITE AND UNLAWFUL DETENTION

25. On Tuesday 19 November 2024, I was travelling from the Kaapmuiden tollgate in Mpumalanga on the N12 and towards my home in Midstream.

26. Upon leaving Kaapmuiden at approximately 10:15, I travelled towards Johannesburg and reached Stefane en route. Together we made our way towards Johannesburg.

27. Stefane lives in Primrose, Johannesburg with his wife Selma Brites ("Selma") and 2 children. He has 3 children in total, 1 child does not reside with him and his wife.

6.7
26.00

6.7

6.7

36. I was placed in the white Golf and had a black hood placed over my head. Stefane was taken to another vehicle, I could not see which vehicle it was.
37. The occupants of the vehicle were shouting to one another that my head and eyes must be covered so that I do not see where we were going.
38. The vehicle travelled for about 30 (thirty) minutes before coming to a stop. At that point the hood was removed from my head and I saw that we had arrived at a house. The gate was dark grey and automated. The walls were medium height and cream to white in colour. It was an old house. There was no number on the outside of the house.
39. Approximately 1 (one) minute after I arrived at this house, Stefane arrived.
40. I was then taken out of the vehicle and walked through what seemed to be a lounge area and into a kitchen area.
41. Stefane had not arrived there. I was not sure where he was taken.
42. I was made to stand, still with my hands restrained but now in steel hand cuffs.
43. The men, still unidentified to me and with no identification documents, badges nor cards and with no other documentation whatsoever, began interrogating me.
44. At no stage prior hereto nor anytime thereafter did any individual identify themselves to me nor Stefane as police officers.
45. None of the individuals were in police uniform and their vehicles were not marked however, I was able to see a white BMW police marked vehicle that was serving as an escort whilst we were making our way to the interrogation house.
46. The men were wearing either blue or grey jeans or cargo pants.

B-1
N20x

ELV
E-1

47. After being placed in the kitchen approximately 12-13 more men arrived at the house and all of them came into the kitchen where I was standing, now restrained by the hand cuffs.

48. One of the men, now identified as Colone (Dawood) of the South African Police anti-kidnapping unit, began speaking to me. He showed me a photograph on his mobile phone of myself and my brother-in-law in Overport, Durban. The photo depicted myself and my brother-in-law eating at a take away restaurant.

49. The photo was a screen shot of a video taken of us by the restaurant's CCTV cameras.

50. He asked if I knew who the people in the photo were and I responded that it was me and my brother in-law.

51. He began questioning me on what we were doing there, who the other person was; and if I was aware that someone was kidnapped 2 (two) months ago. I said I did not know.

52. He then told me the name of the alleged kidnap victim is Zakariya Desai. Again I insisted that I did not know who that was.

53. He began telling me that my brother-in-law came to Durban to buy airtime so that he can call the family of Desai to ask for a ransom. He made no allegations against me at all.

54. I insisted that I never saw my brother-in-law buying airtime nor making any calls to anyone especially not for ransom.

55. As I began explaining to him what I was doing in Durban on that date, he began assaulting me.

56. He first punched me in the face just below my right eye. Immediately the other men in the room followed suit. I was beaten for approximately 25 (twenty-five) minutes and I was stripped naked. My clothes were removed while my hands were still restrained, resulting in severe pain to my hands and my clothes being ripped apart. During this 25 (twenty) minute ordeal, Dawood placed an SAP marked plastic bag on my head; he then fastened the bag at the bottom and inserted a hosepipe therein.
57. Three to four men then held the bag tightly around my head and the hosepipe was turned on. Soon the bag filled with water and I began drowning. I fell to the floor and the bag opened. I had passed out momentarily.
58. While I was on the floor the 4 (FOUR) men sat on top of me and my feet were now restrained.
59. The men were demanding that I speak and asking me questions regarding my brother in law and the alleged victim. I was not able to speak coherently but muttered that I did not know anything of what they were asking me.
60. This torture continued randomly for about two days until Wednesday 20 November 2024.
61. The torture would endure for approximately 20 - 30 minutes at a time. They would stop only to ensure that we would not die.
62. I passed in and out of consciousness randomly during the 48 (forty - eight) hour ordeal.
63. During the ordeal on Tuesday and while they were in one of their torture sessions, they called my wife Naziah from one of their phones. I am told by my wife that the

number has been identified as Captain Mohammed Inath Racot, a Captain in the South African Police Service ("SAP"). A copy of this verification is annexed hereto and marked "EN24".

65. While I was getting tortured they called Naziah and started asking Naziah questions and making threats to her. I was in and out of consciousness at this time but I was crying and screaming for Naziah to help me. Dawood told Naziah something to the effect that if she ever wanted to see me again she must tell him where her brother is.

66. She insisted that she didn't know and that I had nothing to do with her brother.

67. Dawood said that if Naziah did not tell them where her brother was, Dawood was "going to cut me up into pieces and deliver me to her in a box".

68. The phone calls continued and I was also forced to speak to her. I was told that I must beg her to tell the police officers about the whereabouts of her brother and tell them that they were going to kill me if she didn't.

69. I cannot recall all the phone calls but can recall that there were a number of calls between Tuesday and Wednesday.

70. During the ordeal, myself and Stefane were substituted with one another. Every 30 minutes or so and during our "break times", I would be taken out of the kitchen and left to lie naked on the floor in another room while they began or continued with the torture and assault of Stefane.

71. We were almost never in the same room except once where they brought Stefane in to show him what they were doing to me and what they were going to do to him.

photographs annexed as above. These acts resulted in serious physical injuries and psychological trauma.

- 74.3. Unlawful Detention: I was held at a black site for over 48 hours without being informed of my rights, allowed access to legal counsel, or provided medical treatment. My detention during this period was unconstitutional and in direct violation of the Criminal Procedure Act.
- 74.4. As stated supra, we were arrested on 19 November 2024; taken to a black site, tortured; then driven around Johannesburg and to our homes; made to sit in the car while the police raided, ransacked and pillaged our homes; then driven out of the province to Mpumalanga and then eventually driven to Kwa-dukuzi to be placed in detention in a police cell.
- 74.5. Then, only 4 (four) days later on 22 November 2024, we were officially read our rights. A copy of our Certificate of rights is annexed hereto and marked annexure "EN25" and "EN26" respectively.
- 74.6. Impact on Family: The unlawful actions against me have caused significant distress to my wife and children, who have been left without their primary provider. The detailed account of these impacts is outlined in the confirmatory affidavit of Naziah Nangy, attached hereto. My wife has faced intimidation and threats, forcing her into hiding. Eventually however and on Friday 29 November 2024, the same police officers who threatened to harm my wife, did in fact arrest my wife Naziah.
- 74.7. I only became aware of this when I was told by my sister – in-law on Monday 2 December 2024. Whilst she has since been released, it is

E. M.
N. S. P.

E. M.

14/11/24

Indicative that the Police are willing and able to follow through on any and all threats that they have made thus far.

74.8. **Violation of Due Process:** Despite being arrested on 19 November 2024, I was only presented before a court four days later, contrary to the legal requirement to be brought to court within 48 hours.

75. I submit that these circumstances highlight egregious violations of my constitutional rights and warrant the court's serious consideration in granting bail.

Section 60(4) of the Criminal Procedure Act (CPA):

76. I submit that there is no likelihood that my release on bail will:

- 76.1. Endanger the safety of the public or any person;
- 76.2. Pose a flight risk;
- 76.3. Result in interference with the State's witnesses or evidence.

Family and Community Ties:

77. I have deep-rooted family and community ties in South Africa, as evidenced by my long-standing residence and employment. My wife and children depend on me for their financial and emotional well-being.

No Prior Convictions or Pending Cases:

E-1
NSA

E-11

10/1/24

78. I have no prior criminal convictions or pending cases against me, either in South Africa or Mozambique. I further submit that I have no Domestic Violence nor
- Harassment orders filed against me.

Commitment to Stand Trial:

79. I am committed to attending all court appearances and cooperating fully with the judicial process. My travel documents, including my passport, will be surrendered to the court or investigating officer to alleviate any concerns of flight risk.

CONDITIONS OF RELEASE

80. I am willing to comply with any reasonable bail conditions imposed by this Honourable Court, including but not limited to:

- 80.1. Reporting to a designated police station at regular intervals;
- 80.2. Restricting my movements within a specified geographic area;
- 80.3. Abstaining from any contact with State witnesses.
- 80.4. I am also prepared to provide a monetary assurance as determined by the court to secure my release on bail.

RELIEF REQUESTED

FM
N.S.K.
EM

ALL

81. I respectfully request this Honourable Court to grant bail in the interests of justice, considering my personal circumstances, commitment to the trial, and the absence of any risk factors associated with my release.

CONCLUSION

82. I humbly submit that the denial of bail would severely prejudice me and my family, particularly as I am the sole breadwinner and my prolonged incarceration will cause undue hardship.

83. In light of the above, I request that this Honourable Court considers my application favourably.

DATED AT Worcester ZA ON THIS THE 09th DAY OF December 2024

E M PAME NANCY
DEPONENT

THUS DEPOSED TO AND SWORN TO BEFORE ME AT 11:00 ON THIS 09 DAY OF December 2024, THE DEPONENT HAVING ACKNOWLEDGED THAT HE KNOWS AND UNDERSTANDS THE CONTENTS OF THIS DECLARATION, THAT HE HAS NO OBJECTION TO TAKING THE PRESCRIBED OATH AND THAT HE ACCEPTS SUCH OATH TO BE BINDING ON HIS CONSCIENCE. AFTER

E M

NSP

1-11-

E M

16

ESTABLISHING THIS, I PLACED THE DEPONENT UNDER OATH BY CAUSING
THE DEPONENT TO DECLARE THE FOLLOWING: -

"I SWEAR THAT THE CONTENTS OF THIS DECLARATION ARE TRUE AND
CORRECT SO HELP ME GOD."

 *Shutob & Co
NBP Xulu*

COMMISSIONER OF OATHS

FULL NAMES:

Nokulunga Siphwe Precious Xulu

FULL BUSINESS ADDRESS:

*106 CHIEF ALBERT LUTHULI STREET
KWADUKUZA*

DESIGNATION AREA:

EST

*E-1
NSP*

E-11

NSP

number has been identified as Captain Mohammed Inlath Ragof, a Captain in the South African Police Service ("SAP"). A copy of this verification is annexed hereto and marked "EN24".

65. While I was getting tortured they called Naziah and started asking Naziah questions and making threats to her. I was in and out of consciousness at this time but I was crying and screaming for Naziah to help me. Dawood told Naziah something to the effect that if she ever wanted to see me again she must tell him where her brother is.
66. She insisted that she didn't know and that I had nothing to do with her brother.
67. Dawood said that if Naziah did not tell them where her brother was, Dawood was "going to cut me up into pieces and deliver me to her in a box".
68. The phone calls continued and I was also forced to speak to her. I was told that I must beg her to tell the police officers about the whereabouts of her brother and tell them that they were going to kill me if she didn't.
69. I cannot recall all the phone calls but can recall that there were a number of calls between Tuesday and Wednesday.
70. During the ordeal, myself and Stefane were substituted with one another. Every 30 minutes or so and during our 'break times', I would be taken out of the kitchen and left to lie naked on the floor in another room while they began or continued with the torture and assault of Stefane.
71. We were almost never in the same room except once where they brought Stefane in to show him what they were doing to me and what they were going to do to him.

E 7
N 50x

E 7

72. I cannot attest as to what they did with Stefane but have been told by him that the treatment was the same. He also has suffered irreversible injury and has now lost the use of his voice from his larynx being crushed by the police officers.

73. I submit that my wife had the necessary wit to record the telephone calls made to her and which she made to the police officers directed through my phone. These recordings have been transcribed by my attorneys of record and are annexed hereto as annexure "EN23". I also have a memory stick of the actual recording and same will be presented at the hearing of this matter.

BAIL CONSIDERATIONS

EXCEPTIONAL CIRCUMSTANCES

74. I respectfully submit that the following exceptional circumstances justify my release on bail:

74.1. **Unlawful Arrest:** I was arrested under conditions that violated my constitutional rights. The individuals involved in my arrest did not identify themselves properly as law enforcement officers, and no valid arrest warrant was presented.

74.2. **Torture and Assault:** During my detention, I was subjected to inhumane treatment, including severe physical assaults, torture techniques such as waterboarding, and threats against my life. These incidents are corroborated by the confirmatory affidavits of Naziah Nangy, Selma Pereira Da Costa Brites, and Jessica Ismael Nangy, as well as the

B-7

NSDx

E-7

H.V.

photographs annexed as above. These acts resulted in serious physical injuries and psychological trauma.

- 74.3. Unlawful Detention: I was held at a black site for over 48 hours without being informed of my rights, allowed access to legal counsel, or provided medical treatment. My detention during this period was unconstitutional and in direct violation of the Criminal Procedure Act.
- 74.4. As stated supra, we were arrested on 19 November 2024; taken to a black site, tortured; then driven around Johannesburg and to our homes; made to sit in the car while the police raided, ransacked and pillaged our homes; then driven out of the province to Mpumalanga and then eventually driven to Kwa-dukuza to be placed in detention in a police cell.
- 74.5. Then, only 4 (four) days later on 22 November 2024, we were officially read our rights. A copy of our Certificate of rights is annexed hereto and marked annexure "EN25" and "EN26" respectively.
- 74.6. Impact on Family: The unlawful actions against me have caused significant distress to my wife and children, who have been left without their primary provider. The detailed account of these impacts is outlined in the confirmatory affidavit of Naziah Nangy, attached hereto. My wife has faced intimidation and threats, forcing her into hiding. Eventually however and on Friday 29 November 2024, the same police officers who threatened to harm my wife, did in fact arrest my wife Naziah.
- 74.7. I only became aware of this when I was told by my sister – in-law on Monday 2 December 2024. Whilst she has since been released, it is

G M
Nopx

E M

14/11/24

Indicative that the Police are willing and able to follow through on any and all threats that they have made thus far.

74.8. **Violation of Due Process:** Despite being arrested on 18 November 2024, I was only presented before a court four days later, contrary to the legal requirement to be brought to court within 48 hours.

75. I submit that these circumstances highlight egregious violations of my constitutional rights and warrant the court's serious consideration in granting bail.

Section 60(4) of the Criminal Procedure Act (CPA):

76. I submit that there is no likelihood that my release on bail will:

76.1. Endanger the safety of the public or any person;

76.2. Pose a flight risk;

76.3. Result in interference with the State's witnesses or evidence.

Family and Community Ties:

77. I have deep-rooted family and community ties in South Africa, as evidenced by my long-standing residence and employment. My wife and children depend on me for their financial and emotional well-being.

No Prior Convictions or Pending Cases:

E-1
NSA

E-11

NSA

14

78. I have no prior criminal convictions, or pending cases against me, either in South Africa or Mozambique. I further submit that I have no Domestic Violence nor Harassment orders filed against me.

Commitment to Stand Trial:

79. I am committed to attending all court appearances and cooperating fully with the judicial process. My travel documents, including my passport, will be surrendered to the court or investigating officer to alleviate any concerns of flight risk.

CONDITIONS OF RELEASE

80. I am willing to comply with any reasonable bail conditions imposed by this Honourable Court, including but not limited to:
- 80.1. Reporting to a designated police station at regular intervals;
 - 80.2. Restricting my movements within a specified geographic area;
 - 80.3. Abstaining from any contact with State witnesses.
 - 80.4. I am also prepared to provide a monetary assurance as determined by the court to secure my release on bail.

RELIEF REQUESTED

TF
Nelson
EM

LL

15

81. I respectfully request this Honourable Court to grant bail in the interests of justice, considering my personal circumstances, commitment to the trial, and the absence of any risk factors associated with my release.

CONCLUSION

82. I humbly submit that the denial of bail would severely prejudice me and my family, particularly as I am the sole breadwinner and my prolonged incarceration will cause undue hardship.

83. In light of the above, I request that this Honourable Court considers my application favourably.

DATED AT ~~WINDHOLDS~~ ZA ON THIS THE 9th DAY OF ~~December~~ 2024

B M PAMELA NANCY
DEPONENT

THUS DEPOSED TO AND SWORN TO BEFORE ME AT 11:30 ON THIS 09 DAY OF ~~December~~ 2024, THE DEPONENT HAVING ACKNOWLEDGED THAT HE KNOWS AND UNDERSTANDS THE CONTENTS OF THIS DECLARATION, THAT HE HAS NO OBJECTION TO TAKING THE PRESCRIBED OATH AND THAT HE ACCEPTS SUCH OATH TO BE BINDING ON HIS CONSCIENCE. AFTER

B M

NSP

1-11-

B M

16

ESTABLISHING THIS, I PLACED THE DEPONENT UNDER OATH BY CAUSING
THE DEPONENT TO DECLARE THE FOLLOWING: -

"I SWEAR THAT THE CONTENTS OF THIS DECLARATION ARE TRUE AND
CORRECT SO HELP ME GOD."


24/11/08
N.S.A. Xulu

COMMISSIONER OF OATHS

FULL NAMES: *Nokulunga Sipahwe Precious Xulu*
FULL BUSINESS ADDRESS: *106 CHIEF ALBERT LUTHULI STREET*
DESIGNATION AREA: *KwaDukuza*
EST

B-1
NSA
E-M

NSC

From: Uber Receipts noreply@uber.com
Subject: Your Tuesday afternoon order with Uber Eats
Date: 18 February 2025 at 15:12
To: cindibennett65@gmail.com

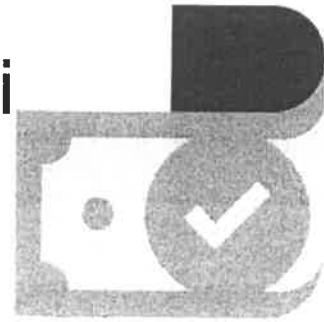
UR

Uber Eats

Total ZAR 158.46
February 18, 2025

Thanks for ordering, Cindi

Here's your receipt for The Lucky
Bread Company, Menlyn Maine.



Total

ZAR 158.46

Ⓢ You saved ZAR 14.82 on this order with Uber One and promos

📄 To view your full receipt go to [Uber Eats](#) , or [download this PDF](#)

Payments

**Visa ••••2286**

2/18/25 3:12 PM

ZAR 158.46

[Visit the order page](#) for more information, including invoices (where available).

Switch Payment Method >

home affairs

Department:
Home Affairs
REPUBLIC OF SOUTH AFRICA

1 1312917

83/DHA-5

"ENO"

PARTICULARS FROM THE POPULATION REGISTER NO.
IDENTITY/IDENTITEIT

IDNO.:
IDNR.: 730126 5530 18 3

SURNAME:
VAN: RAMOS NANGY

FIRST NAME:
VOORNAME: ESMARL MAULIDE

DATE OF BIRTH:
GEBORTE DATUM: 1973-01-26

DATE ISSUED:
DATUM UITGEREIK: 2024-05-09

OFFICE CODE:
KANTOORKODE: YCG



ISSUED BY:
UITGEREIK DEUR: YCG306

(VALID FOR 2 MONTHS FROM DATE OF ISSUE)
(GELDIG VIR 2 MAANDE NA UITREKINGSdatum)

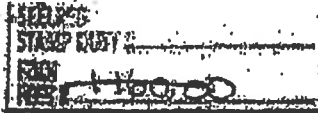
SFA

8-7

E-M

EUI

85



VAN DER MERWE DU TOIT INC
BROOKLYN PLACE
Cnr. BRONKHORST & DEY STREETS
BROOKLYN
(012) 452 1300

R1 200-00

Prepared by Mrs.

CONVEYANCER
JOHAN LIEBENBERG

T 16 24374

DEED OF TRANSFER

BE IT HEREBY MADE KNOWN THAT

RIGARDT BARNARD

appeared before me, REGISTRAR OF DEEDS at PRETORIA, in the said
Apparator being duly authorized thereto by a Power of Attorney signed at
SANDTON on 24 FEBRUARY 2018 and granted to him by

1. GERHARDUS VAN ROOYEN
Identity Number 770430 5049 08 2
Married out of community of property
2. NIKI VAN WYK
Identity Number 770228 0221 05 0
Married out of community of property

dated 13.7.18

K.V.

B-7
NEX
E-7

Page 2

And the Appraiser declared that his said principal had truly and legally sold on 15 January 2016 and that he, the said Appraiser, in his capacity aforesaid, did, by these presents, cede and transfer to and on behalf of

ESMAEL MAULIDE RAMOS NAIROY
Identity Number 730126 5530 18 3
Unmarried

his Heirs, Executors, Administrators, or Assigns, in full and free property

PORTION 7 OF ERF 57 MIDSTREAM ESTATE TOWNSHIP
REGISTRATION DIVISION J.R., PROVINCE OF GAUTENG

MEASURING 470 (FOUR HUNDRED AND SEVENTY) SQUARE METRES

FIRST TRANSFERRED BY DEED OF TRANSFER T85328/2004 WITH
GENERAL PLAN L.G. 1155-1/2003 RETALING THERETO AND HELD BY
DEED OF TRANSFER T104173/2013

SUBJECT TO THE FOLLOWING CONDITIONS:

- A. Property hereby transferred shall be subject to the following conditions imposed by the Local Authority in terms of the provisions of the Town Planning and Townships Ordinance, 1956:
 - 1 (a) The erf is subject to a servitude, 2 m wide, in favour of the local authority, for sewerage and other municipal purposes, along any two boundaries other than a street boundary and in the case of a panhandle erf, an additional servitude for municipal purposes, 2 m wide across the access portion of the erf, if and when required by the local authority. Provided that the local authority may dispense with any such servitude,
 - (b) No building or other structure shall be erected within the aforesaid servitude area, and no large-rooted trees shall be planted within the area of such servitude or within 2 m thereof.
 - (c) The local authority shall be entitled to deposit temporarily on the land adjoining the aforesaid servitude such material as may be excavated by it during the course of the construction, maintenance or removal of such sewerage mains and other works as it, in its discretion, may deem necessary, and shall further be entitled to reasonable access to the said land for the aforesaid purpose, subject to any damage done during the process of the construction, maintenance or removal of such sewerage mains and other works being made good by the local authority.
2. The erf is entitled to a right-of-way servitude over Erf 147 and 148 as indicated on the General Plan S.G. No. 1816/2003

Obastefny: 15.7.4.2.

6-7
NABOK

E-17

162/

Page 3.

3. No drilling of boreholes will be permitted for the abstraction of groundwater on the erf.

B. ONDERHEWING AAN die volgende voorwaardes ten gunste van Middelburg Home Owners Association NPC. (Registrasienommer 2002/017983/08) (hierna genoem die Vereniging):

- (a) Elke eienaar van die erf of enige onderverdeling daarvan, sal outomaties by registrasie van die oordrag, 'n lid word en 'n lid bly van die Vereniging en sal gebonde wees aan die bepalinge van die Vereniging as Akte van Oprigting en Statute en die Huiseienaars Reguleerder tot dat hy ophef om eienaar te wees. Geen erf of enige onderverdeling daarvan of enige belang daarin sal aan enige persoon oorgedra word nie indien daardie persoon nie vooraf homself verbind het tot die bevestiging van genoemde Vereniging om lid van die Vereniging te word nie.
- (b) Die eienaar sal nie geregtig wees om die erf of enige onderverdeling daarvan oor te dra sonder 'n oorklaringseertifikaat van die Vereniging waarin die Vereniging sertifiseer dat alle gelde verskuldig aan die Vereniging betaal is en daar voldoen is aan die bepalinge van die Akte van Oprigting en Statute van die Vereniging nie.

C. Subject to the following conditions imposed in favour of ERF 57 AND 488 HOMEOWNERS ASSOCIATION NPC:

- (i) The owner of the erf or any subdivision thereof or of any sectional title thereof or of any interest therein, shall not be entitled to transfer the erf or any subdivision thereof or any unit or any interest therein without the prior written confirmation of the association that all amounts due to the association by the owner have been paid.
- (ii) Every owner of the erf or any subdivision thereof or of any sectional title unit erected thereof, or of any interest therein, shall automatically become and shall remain a Member of the Association and be subject to its memorandum of articles of association until he/she/it ceases to be an owner as aforesaid. Neither the erf nor any subdivision thereof, nor any unit erected thereon, nor any interest therein, shall be transferred to any person who has not bound himself/herself to the satisfaction of the Association to become a member thereof.
- (iii) No improvements of any nature may be effected to the erf without the written approval of the association and any building plans in respect of any improvements to be erected on the erf shall be subject to the prior written approval of the association.

Sharon Harvey 13.7.12

S-7
NAR

E M

ALC

Page 4.

The term "Association" in the aforesaid conditions of title shall mean the ERF 57 AND 498 HOMEOWNERS ASSOCIATION NPC

- D. This portion is subject to a servitude represented by the figures A.C.D.E.F.G. a b c d e f g h for municipal purposes in favour of the Ekurhuleni Metropolitan Municipality as indicated on General Plan S.G. 11681/2003.

SUBJECT to such conditions as are mentioned or referred to in the aforesaid Deeds.

WHEREFORE the Appearer, renouncing alright and title which the said

1. GERHARDUS VAN ROOYEN, Married as aforesaid
2. NIKI VAN WYK, Married as aforesaid

heretofore had to the premises, did in consequence also acknowledge them to be entirely dispossessed of, and disentitled to the same, and that by virtue of these presents, the said

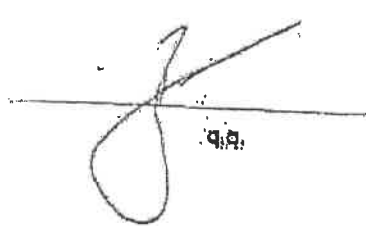
ESMAEL MAULIDE RAMOS NANGY, Unmarried

his Heirs, Executors, Administrators or Assigns, now is and henceforth shall be entitled thereto, conformably to local custom, the State, however reserving its rights, and, finally acknowledging the purchase price to be the sum of R2 280 000,00 (TWO MILLION TWO HUNDRED AND SIXTY THOUSAND RAND).

IN WITNESS WHEREOF, I the said Registrar, together with the Appearer a.d., have subscribed to these presents and have caused the Seal of Office to be affixed thereto.

THUS DONE AND EXECUTED at the Office of the REGISTRAR OF DEEDS at PRETORIA on

05 APR 2018


R.A.

In my presence.


REGISTRAR OF DEEDS

Charlton 13.7.18

07
NIXON

E 07

KX.

EN2

Invoice

Date: 01/11/24
Page: 1

INC24938



Midstream Home Owners Association

1 Old Mill Drive
MIDSTREAM ESTATE
1892Tel. No: 012 110 4550
Bank: ABSA Capitec
Branch Code: 430445
Account No: 305 398 7845
hib@midstream.co.za

Biltel: 00577

Mr. E.M. Rasmus Nkomo
18 Mayibane Street
MIDSTREAM ESTATE
1892

Stand: 577

Due By: 01/11/24

Your Reference: 00577

Payment Terms: 8 days

Incl/Excl
Inclusive

Code	Description	Qty	Unit	Unit Price	Disc%	Tax	Net Price
1000001	Levy - November 2024					0.00%	1,671.25
9000003	CSOS Levy - November 2024					0.00%	23.44
1000005	Recycling - November 2024					0.00%	13.50
1000009	Paramedical Service - November 2024					0.00%	48.11

Please use your account number as reference.
Account Number: 00577

All orders in 30 days+ will be charged 2% interest per month.

120 Days	90 Days	60 Days	30 Days	Sub Total	
0.00	0.00	354.04	1,758.00	Amount Excl Tax	1,758.00
		Current	Total Due	Tax	0.00
		1,758.00	3,516.04	Total	1,758.00

© Sage South Africa (Pty) Ltd

00577

G 7
NEX

E 17

ALV

EN4

www.ezikhuleni.gov.za



City of Ekurhuleni

www.ezikhuleni.gov.za

Stykhokhe Portal
stykhokhe@ekurhuleni.gov.za

Phone: 011 553 000

Email: cityofekurhuleni@ekurhuleni.gov.za
Toll-free 0800 000 000

COPY TAX RECEIPT

VAT Reg No: 4280133493

Taxpayers Number: 1700133493/10/02

a partnership that works

Name	EMK NANGV	Account Number	1700133493
Ward Number	1	Payments Included Until	2024-10-23
Street Address		Facility / Water Deposit	
18 THE AVONDALE STREET		Cash	2024-10-23
Township		Valuation	
MIDSTREAM ESTATE		214	2024-10-23
SFP Number		700 000 000 000 000 000	2024-10-23
Portion		00007 0000 0000	2024-10-23
Area m ²		470	2024-10-23

Date	Item	Details	Charge (incl. VAT)	VAT	Charge (incl. VAT)
09/23		BALANCE BROUGHT FORWARD	13732.58		13732.58
		SUBTOTAL	13732.58		13732.58
10/21		INTEREST ON ARREARS	60.89		60.89
		PROPERTY RATES			
10/21		PROPERTY RATES RESIDENTIAL	3200.40		3200.40
10/21		VA-VALUE EXCLUSION	144.00		144.00
		REFUSE REMOVAL			
10/21		REFUSE DOMESTIC 24L BIN	225.89	33.42	259.31
		WATER SERVICE			
10/21		METER AND TAP 149 TAPERS WATER-RESIDENTIAL			
		Curr = 7240 Prev = 7156 Done = 415			
		Reading dates: Curr 24/10/23 Prev 24/09/23			
		WATER 45 M	1099.42	164.91	1264.33

30 Days	60 Days	90 Days	90 + Days	Total Charge (incl. VAT)	Total VAT	Total Charge (incl. VAT)
6404.24	6744.33	588.01	0.00	19493.60	595.37	19988.97
Amount in Advance				0.00	Due Date	2024-11-18
				Amount Payable		19988.97

M1553106

www.ezikhuleni.gov.za



City of Ekurhuleni

www.ezikhuleni.gov.za

Stykhokhe Portal
stykhokhe@ekurhuleni.gov.za

Phone: 011 553 000

Email: cityofekurhuleni@ekurhuleni.gov.za
Toll-free 0800 000 000



REMITTANCE ADVICE

VAT Reg No: 4280133493

a partnership that works



1700133493



145441707139510

Name	EMK NANGV
Account Number	1700133493
Due Date	2024-11-18
Amount Payable	19988.97

C-7

N-80

E-17

1043

ENS



BOLETIM DE CASAMENTO

...do Registo Civil

1. The first step is to identify the problem or question that needs to be answered. This involves understanding the context and the specific requirements of the task.

7-1-1947

... 20 ...

SECRET

1940

...the ...

2-14-1944 Inter-Service

1970-1971

MAYNARD

De Salzburger Hofmannen

Urdu to Urdu

100-443887-100

[Faint handwritten notes at the bottom of the page, likely bleed-through from the reverse side.]

... ..

NLS

72

古

(Translation)

B No.: 1D
And: 2021
Reg.: 12



REPUBLIC OF MOZAMBIQUE

MARRIAGE CERTIFICATE

The First Civil Registry Office of Maputo, the Port of.....
On the Fifteen January of 2021, at Palácio Hotel.
Polana
Got Marriage Esmel Maulide Ramos Nangy resident at
Maputo
Born to: Maulide Momade Nangy and to Maria Inês Ramos
With: Nazia Moïda Abdul Romane, residents in Maputo....
Born to: Abdul Romane Amade and to Safira Mafidana
Jafar.....

Maputo, 09th June 2021

The Registrar

Illegible Signature

12/1

12/1

12/1

Sworn Translator and
Interpreter
Tradutor Oficial Ajuramentado
Inglês-Português
Francês-Português e vice-versa

Delfo João Marindze
Sworn Translator and Interpreter
Tradutor Oficial Ajuramentado
Mozambique Av, No. 27/35
Phone Number 846257730/876267730/824959039
E-mail: delfojosomarin@icloud.com

AFFIDAVIT/DECLARAÇÃO

To whom it may concern

I, the undersigned, Official Translator and Interpreter, from English into Portuguese and vice-versa, Mozambican, resident in Maputo City, Sworn in by the Maputo City Judicial Court Lord Chief Justice, duly authorized by the same, to...translate, interpret, legalize and witness to translated documents, hereby solemnly declare that the attached Document, translated from English into Portuguese, consisting in (1) page/s, fully legalized with the translator license stamp I officially use, is to the best of my knowledge and belief and to the best accuracy translated.

A quem se dirige

Eu, abaixo-assinado, Tradutor Oficial e Interpretador, de Inglês/Português e vice-versa, Moçambicano, residente na Cidade de Maputo, ajuramentado pelo Tribunal Judicial da Cidade de Maputo, e autorizado pelo mesmo, a traduzir, interpretar, legalizar documentos traduzidos, venho por meio desta solenemente declarar que o Documento cuja cópia encontra-se em anexo, traduzido do Inglês para Português, que consiste em (1) página/s, foi traduzido com precisão, ao melhor do meu

DELO JOÃO MARINDZE
I, Delfo João Marindze, Sworn Translator and Interpreter, from English into Portuguese and vice-versa, Mozambican, resident in Maputo City, Sworn in by the Maputo City Judicial Court Lord Chief Justice, duly authorized by the same, to...translate, interpret, legalize and witness to translated documents, hereby solemnly declare that the attached Document, translated from English into Portuguese, consisting in (1) page/s, fully legalized with the translator license stamp I officially use, is to the best of my knowledge and belief and to the best accuracy translated.

1-11

57
1-11

57

EN6

Visitors / Visitors

PR 1 IV 1102

RENANE NAYON

NAZIA NADA ABDUL

MOZAMBIQUE

08/12/1988

MAPUTO

10/12/2022

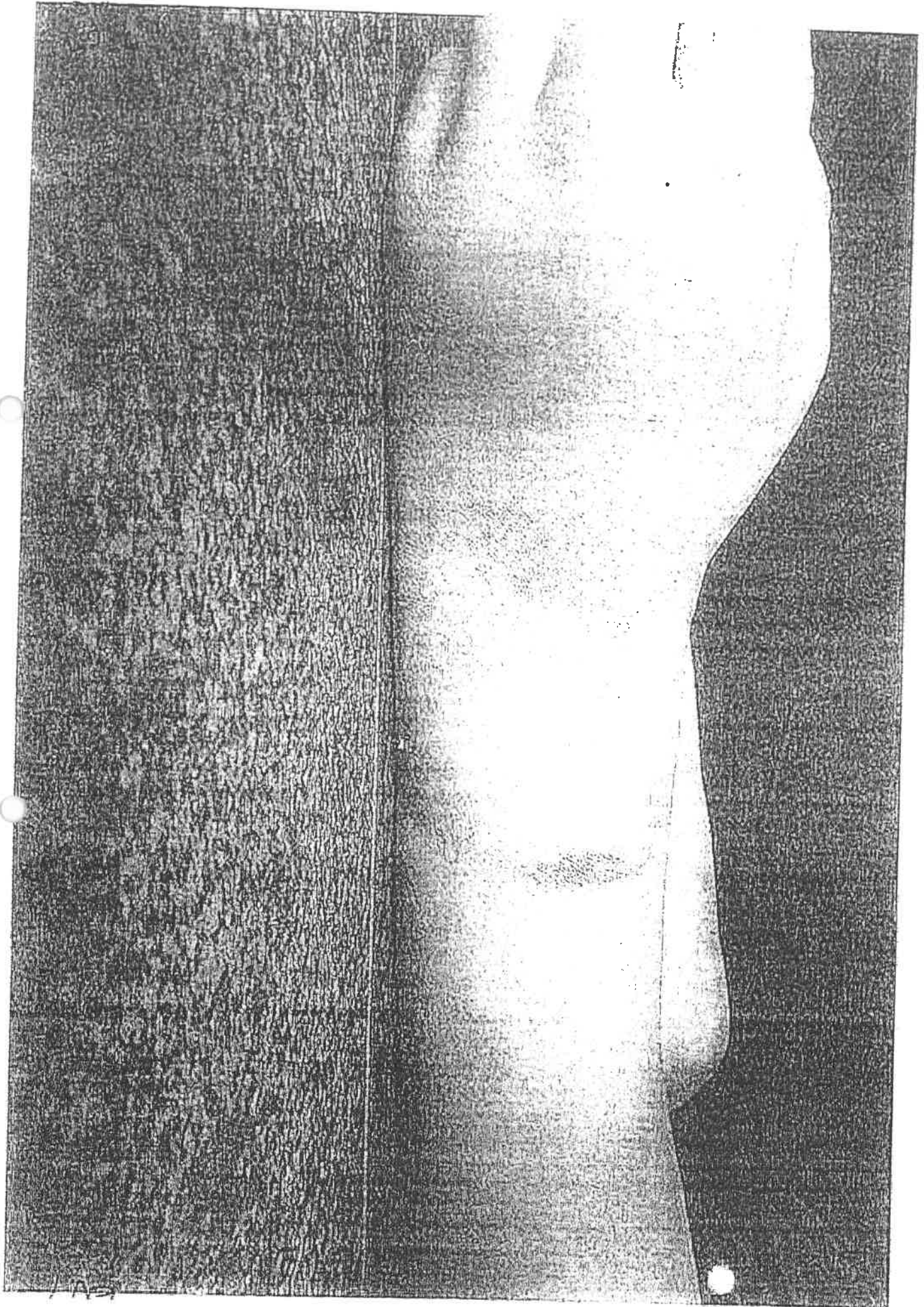
10/12/2022

1-161

07
NEX
E-17

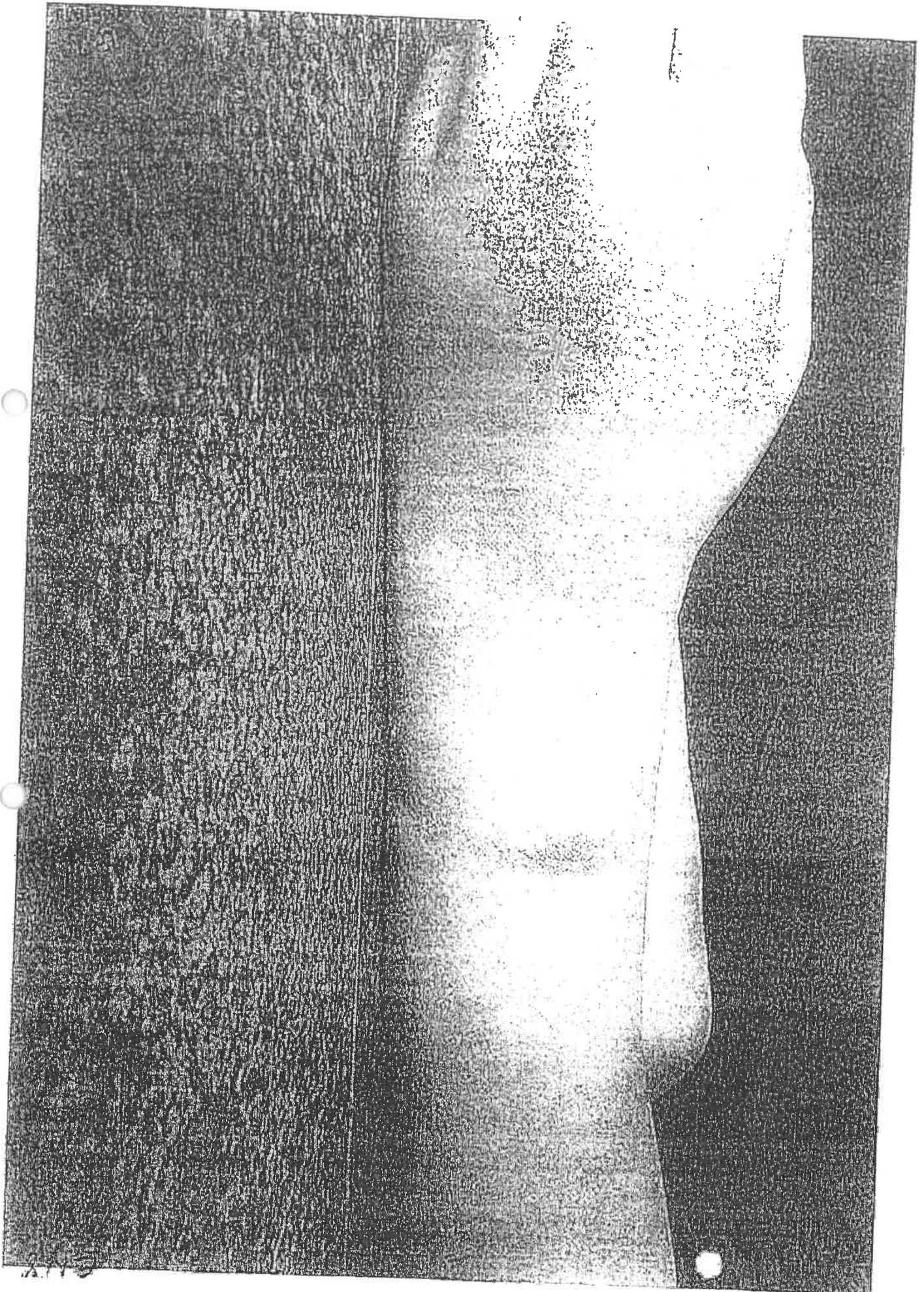
AH

E3



12/11

F.M.



W 7

JAN

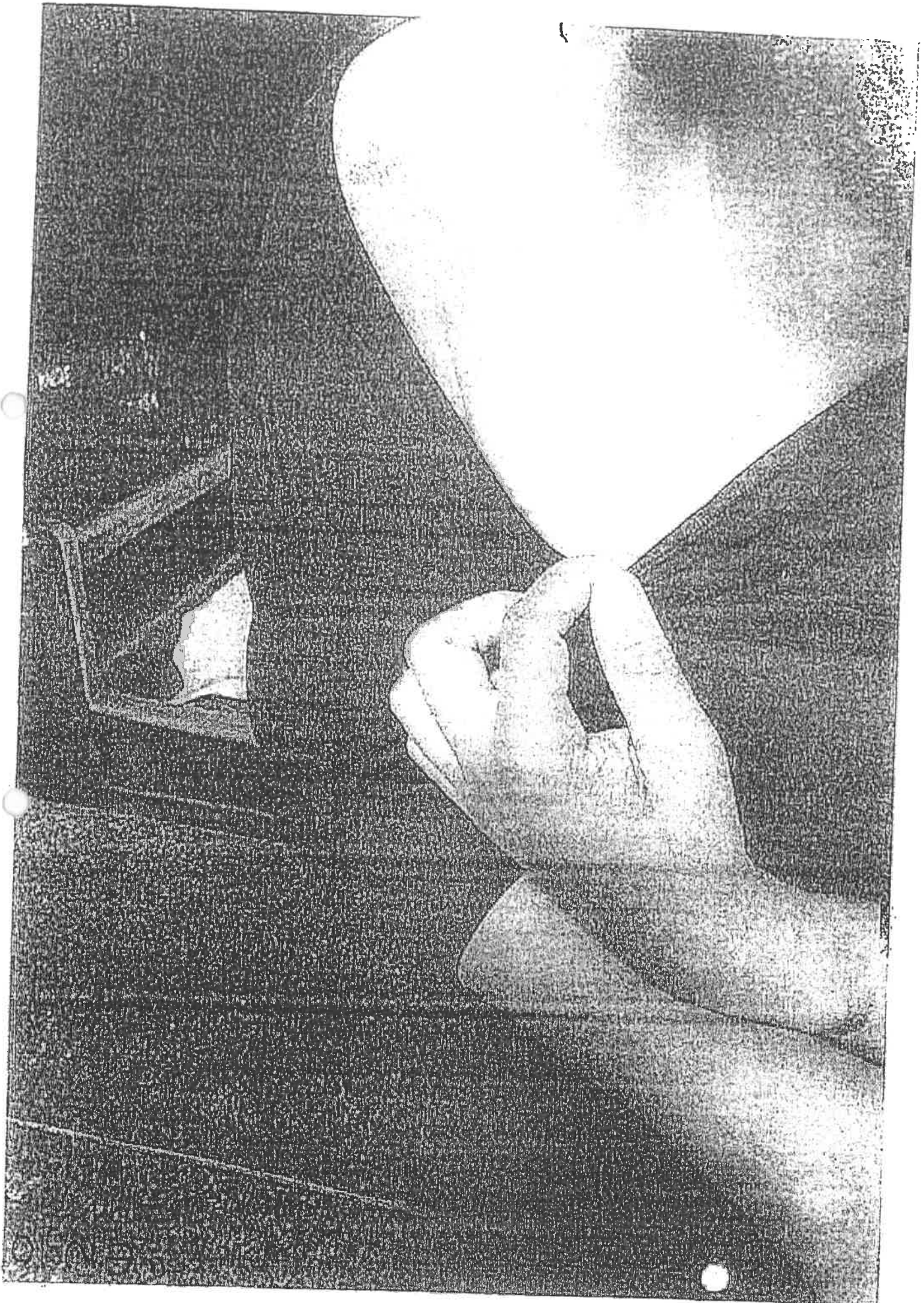
EN 4



b. 1. 2.

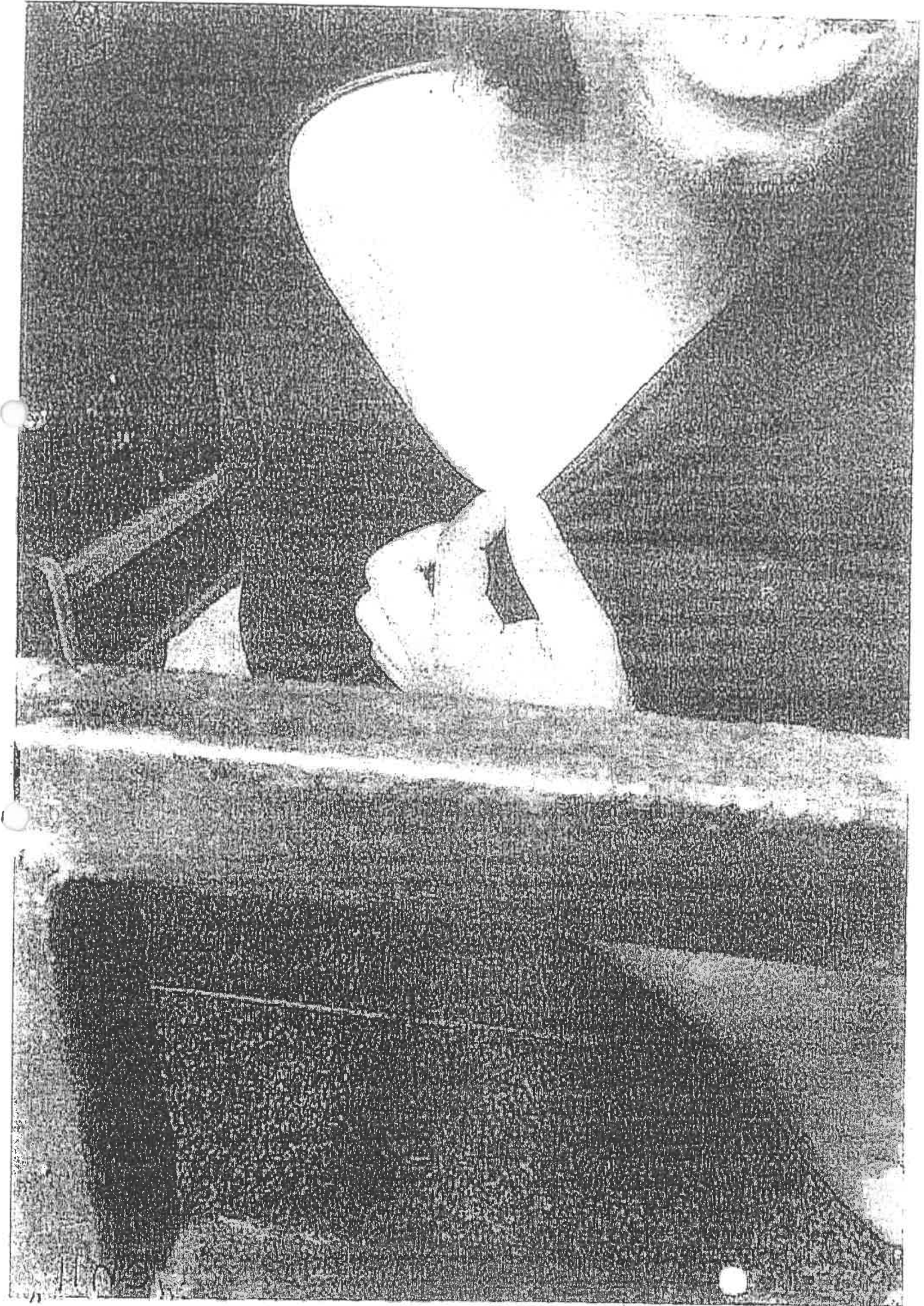
M

51



/Xm/

15. 5



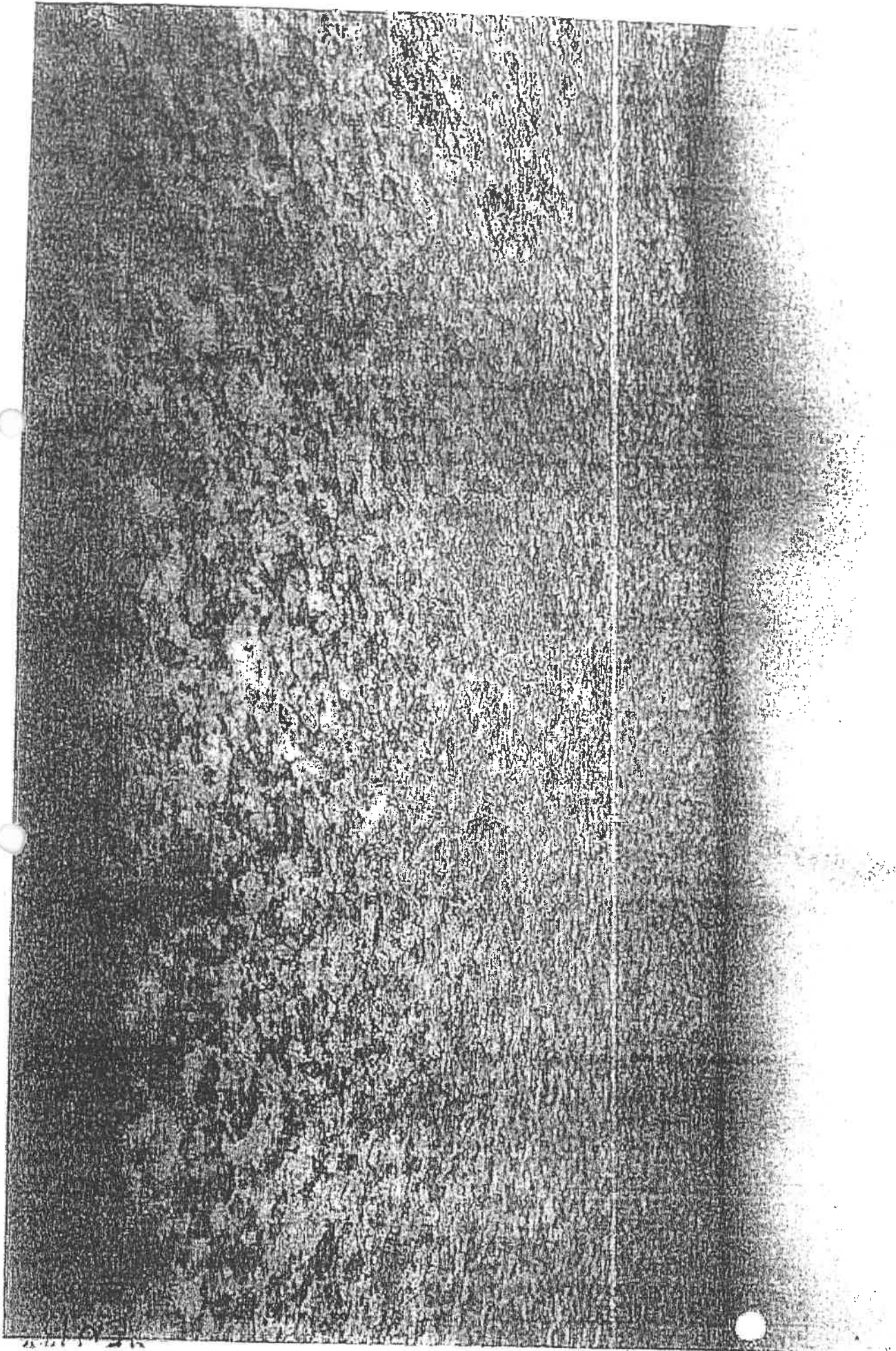
120

L9



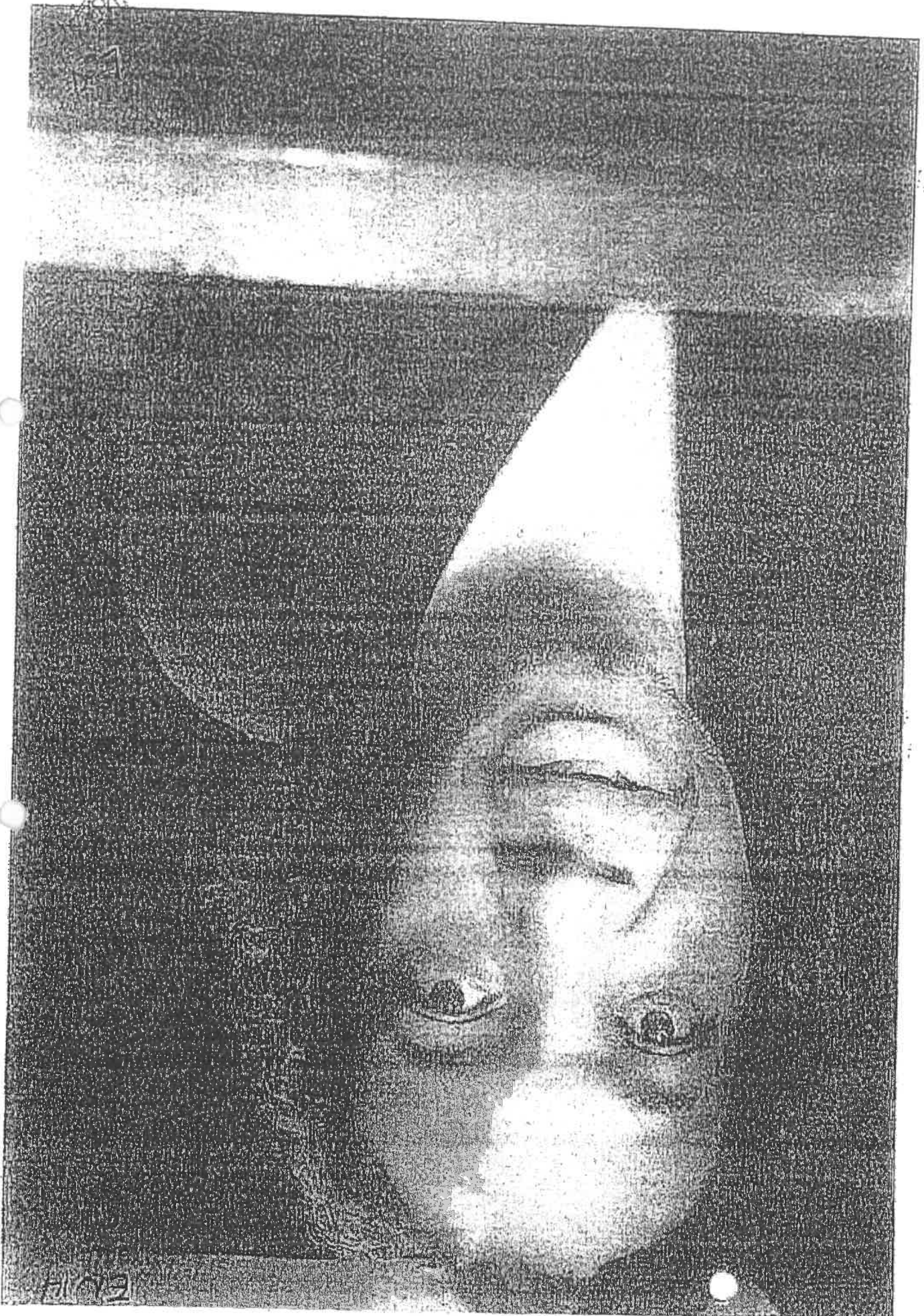
w 4

222



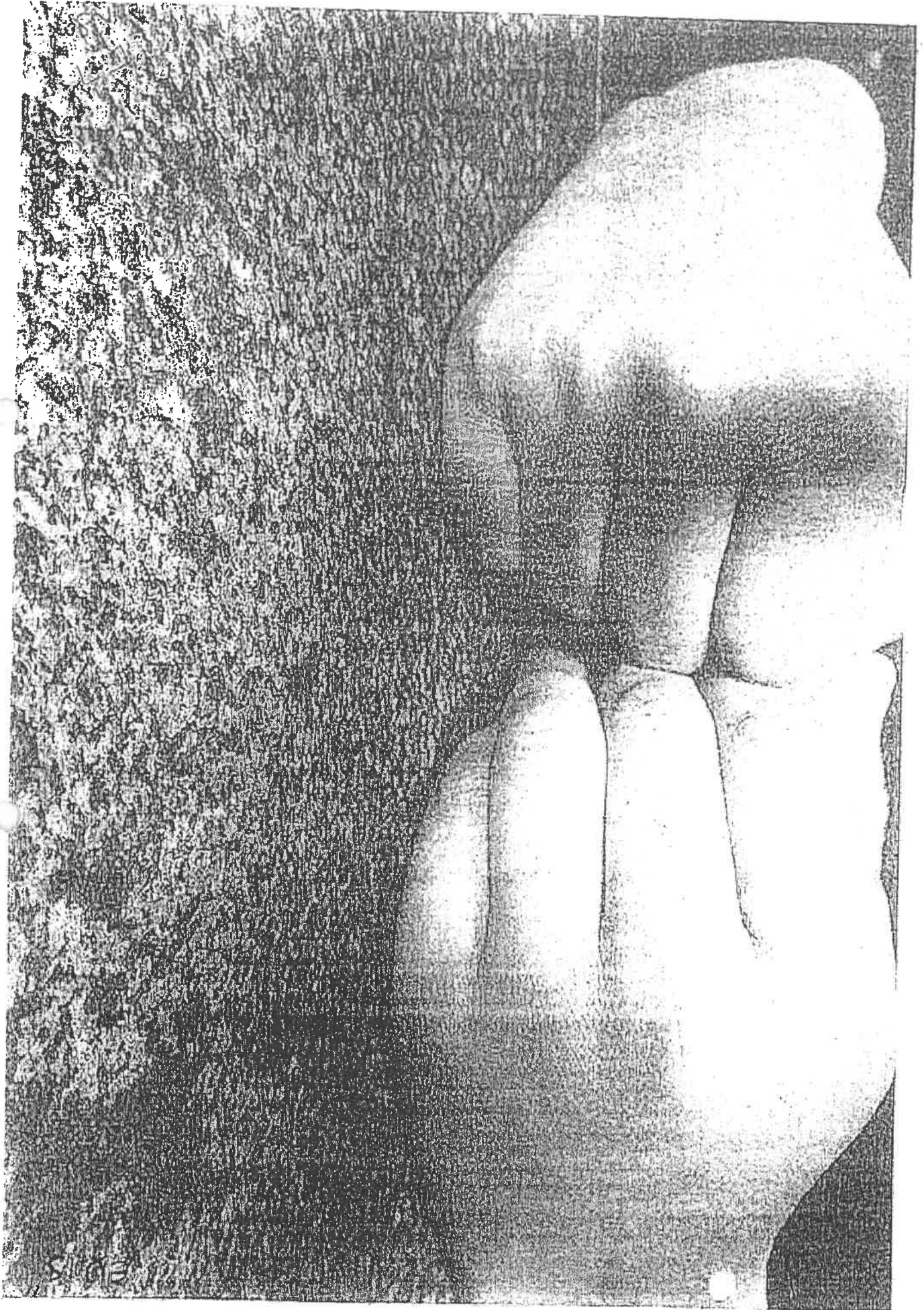
1971

W 5



ms

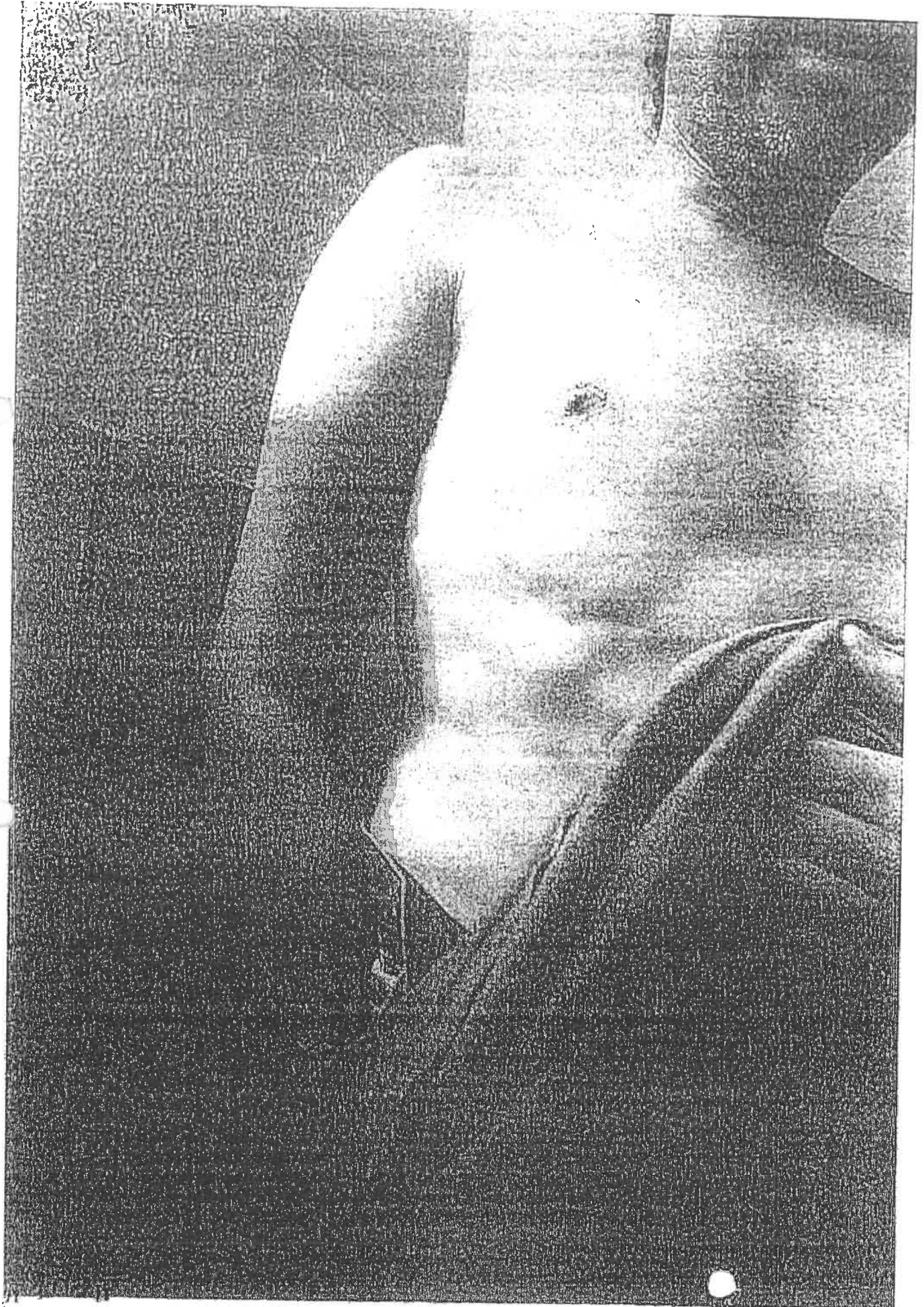
W 4



Slide 17

M.

67



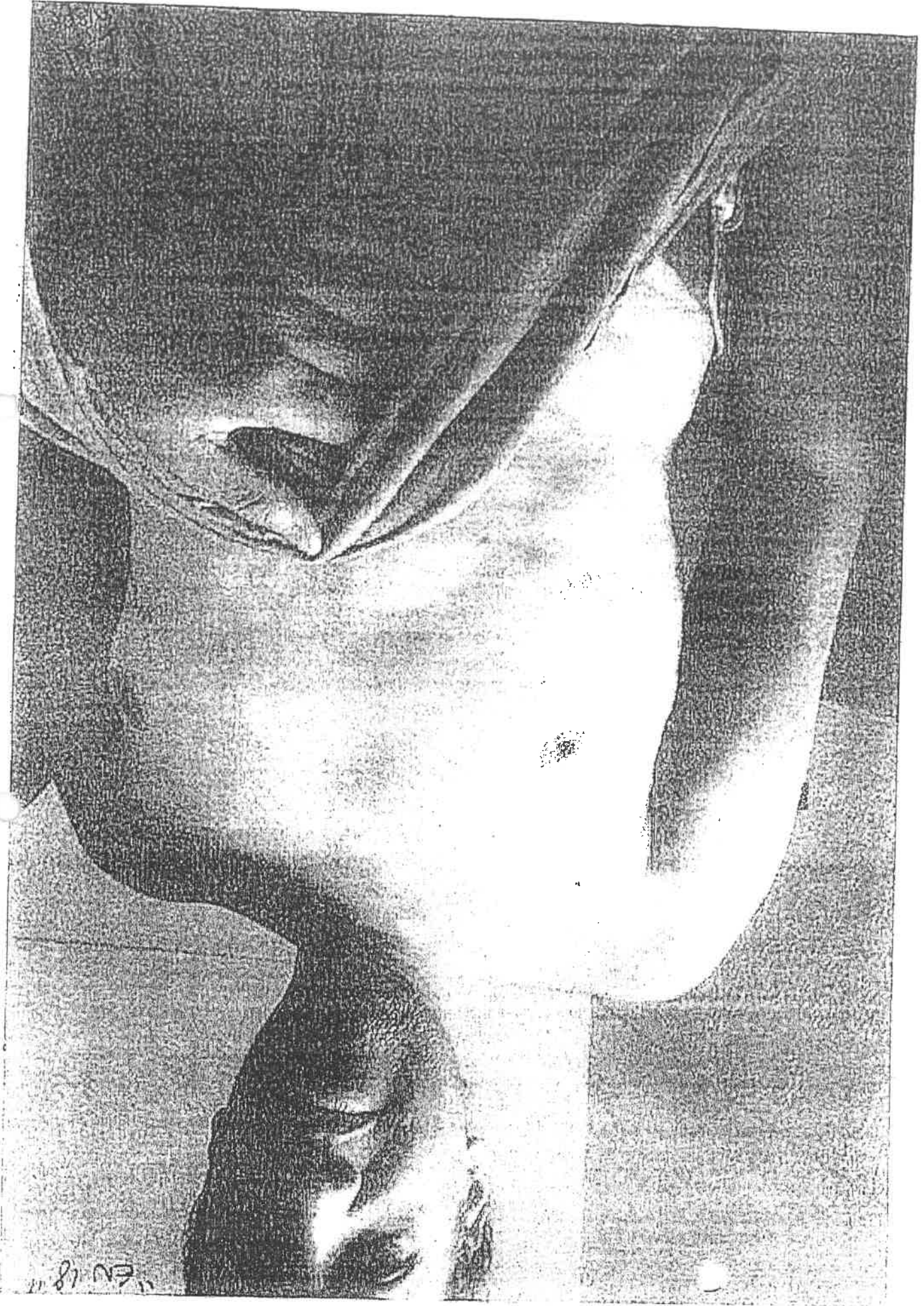
147

147



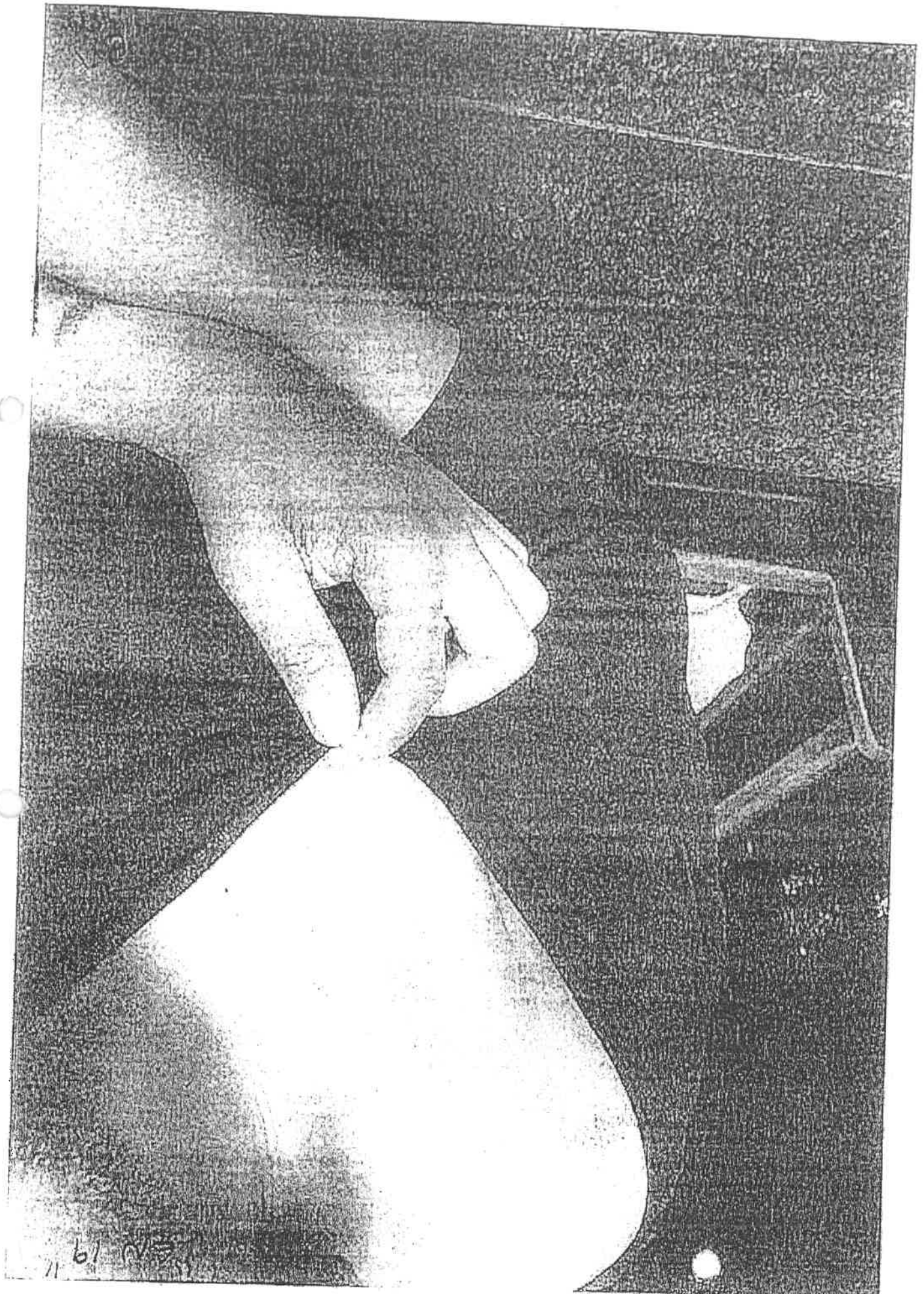
1931

W. B.



1931

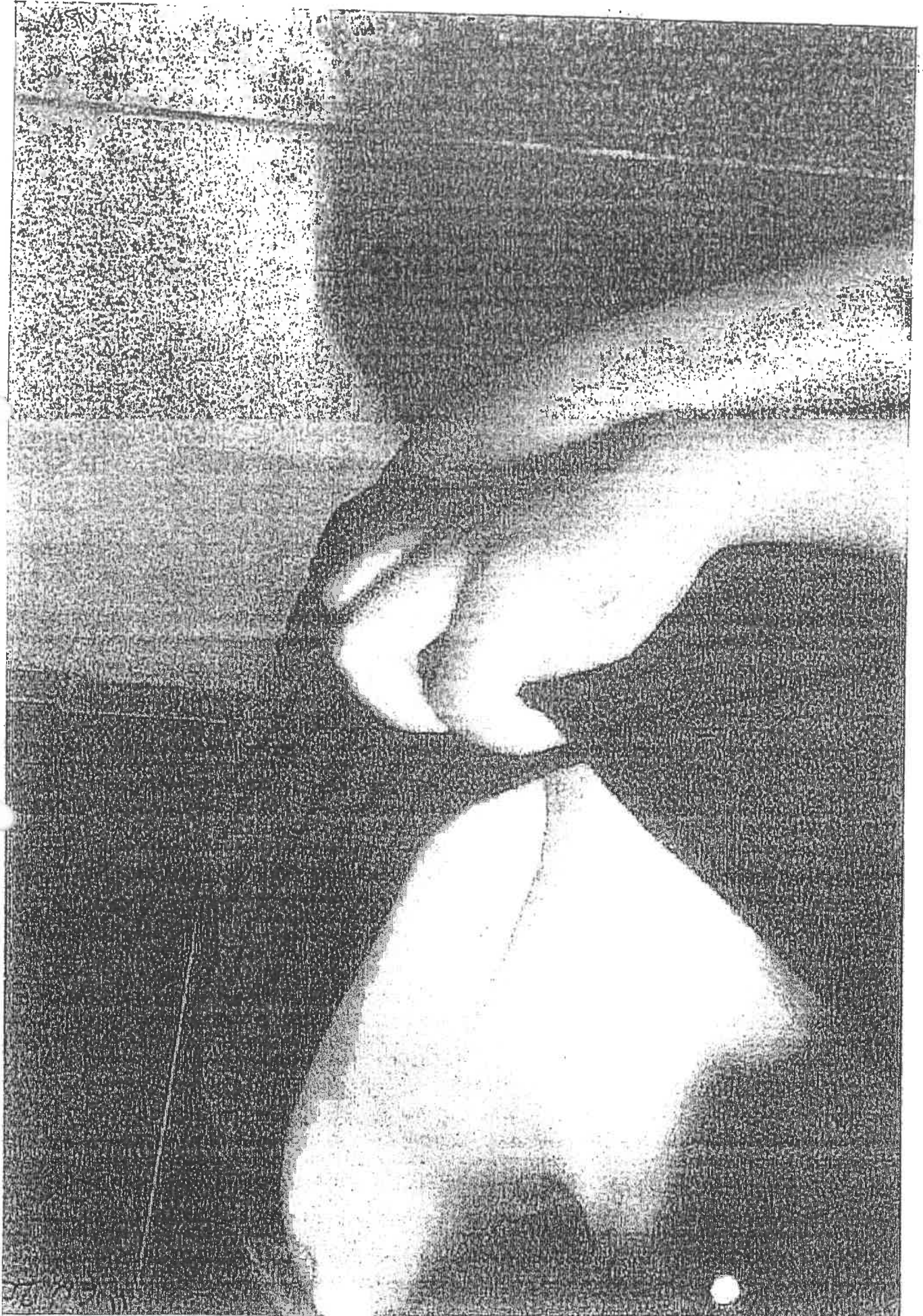
K/U.

 $\sqrt{4}$ 

61 2/3

-241

4



4

Am



NEW 23

Transcript

Speaker 1

Please. We. OK. I'll call you.

Naazla

Yes. Bye.

Speaker 1

Yes.

Naazla

Hello.

Speaker

Please Naazla *Inaudible* tell Mr Zakriya I am suffering too much here, I'm getting hiding

Naazla

I know, I know my husband, but the problem is Janino doesn't even know what they're talking about. I spoke to him. I spoke to him. I spoke to him and I said my husband is suffering. If you did something wrong, yes.

Speaker 1

Naazla Yes, yes, yes. Wait, wait, wait, wait, wait, wait. I. Spoke to Janino. He's telling me that he doesn't know nothing he even swears so please man.

Speaker 3

Yes.

Speaker 1

You hear me? He's told him the same thing. He doesn't know nothing. You tell him even say Jeremy also. You understand? So please, ma'am.

Naazla

You think he's lying to me?

Speaker 1

he's lying to you. He's lying to you. Ask her where she is. Where are you? Where? Home, Where you. Where? You not at home?

B-1
-har

B-1

hkh

Speaker 1

You were not there for two days.

Nazila

I'm. I'm at home. I just left. No, I just. I just left early. But I'm at home.

Speaker 3

see here listen Ask your brother to release the victim.

Nazila

I did that, you know.

Speaker 3

He's lying to you. He's got the victim.

Nazila

You know something? I will never leave my husband suffering. I put my husband the wall, I said. Listen to me. I will not allow my kids to to have their father in jail for things that he didn't do, you know? And I told him if you have someone, if you did something wrong, just present yourself. Otherwise I'm going to tell all the family what's going on here because my. My husband? No, my kids, now are crying.

Speaker 1

I'm giving you. Listen. Yeah, listen. Yeah. Listen. Yeah, I'm. I'm giving you one hour. And then well fucken send your husband to you in pieces in a box. I'm giving you one hour, you understand? Tell her what he told you?

Speaker 1

Nazila he told me last month that he did. He told me you someone two months ago, he told me like that. I'm asking why you did that. This is not because the motorbikes in Maputo they are

Nazila

Hello. Yes.

Speaker 1

OK.

Speaker 1

Hello.

Nazila

Hello. Hello. Yes, yes. Sorry, I was receiving a call. It's a client.

EM
100

B-7

122

Speaker 1

OK, Naazia please. He knows about this. He told me. He told me. Please Naazia, I'm suffering.

Naazia

But why? He's lying to me. Why? Because I told.

Speaker 1

Don't know why.

Naazia

OK, so tell me what must I do? Because I I've been calling him and telling him. Like, listen here. My husband is responding things like.

Speaker 3

Yeah. Listen, listen, listen, listen, listen, listen, listen, listen. We're wasting time over and over, over and over again. And again and again, your brother told. Your husband himself that he took a Muslim guy. All what we're asking for is he release. If you love your husband and he love your husband.

Naazia

But, Sir, Sir, listen to me. Listen to me. If you guys already know it's my brother, who did it, why are you having? Why you? Why? What? My husband you have with that?

Speaker 1

No, he's because he's my brother-in-law. And you are? You can't. Because I came to Durban with him. So for them to release me, they have to release the victim. Just leave him on the street somewhere safe that they can pick him up and then come home. Then, you.

Naazia

I don't know what to do now. You the only thing maybe I will try to trap him because I don't know now what to do because my husband is with you guys. But I know my husband is the innocent. You innocent.

Speaker 1

No, no, no, no, don't say it is you feel guys you must respect.

Naazia

sorry my English is not good Sir, but my husband doesn't have nothing involved with those things.

Speaker 1

You understand? Yeah. Please, Yeah, Please, Yeah.

Naazia

Yeah.

End

14/11

73 17

Speaker 1

Yeah. Please man, just sort this thing out telling. Me my must do these things. Man must not play with my life, man. I'm 52 years old now, 53 years old. Come on then. Right. OK.

Naazla

I know, I know, I know, I know, I know, I know. OK, run. Let's run, Run, run.

Speaker 3

OK, when last you when you spoke to Janino your brother?

Speaker 1

Hello.

Naazla

Sorry. Yes, Sir. Yes, Sir. Yes, Sir.

Speaker 1

Naazla. Naazla. Naazla. Yeah. Naazla. When did you last speak to Janino but why is not?

Naazla

Yesterday

Speaker 1

Why isn't he answering rangys calls?

Naazla

Did you try to call him?

Speaker 1

We are trying to call him. You send me the. Number that you're using. What number are you using for him to talk to you?

Naazla

OK, let me send you the number, OK.

Speaker 1

No no no don't send it to me You need to to give it to me.

Speaker 3

Give it now. Give it now while you on the call.

Speaker 1

6.12

1411

2-7

Don't send it. Give it to me.

Speaker 3

Put it on speaker and give the number now.

Naazla

OK, but how I'm going to give you the number if we have.

pld.

B7
100x

B-7

EU 28

S 3956797

English

NOTICE OF RIGHTS IN TERMS OF THE CONSTITUTION

(SECTION 35 OF ACT NO. 108 OF 1996)

(1) You are being detained for the following reason:

1. Kidnapping

2. 27-02-2018

3. Arrest Robbery

(2) As a person who is detained you have the following rights:

- (a) you have the right to consult with a legal practitioner of your choice or, should you so prefer, to apply to the Legal Aid Board to be provided by the State with the services of a legal practitioner;
- (b) you have the right to challenge the lawfulness of your detention in person before a court of law and to be released if such detention is unlawful;
- (c) you have the right to be detained under conditions consonant with human dignity, which shall include at least the provision of adequate accommodation, nutrition, reading material and medical treatment at state expense; and
- (d) you have the right to be given the opportunity to communicate with, and be visited by, your spouse or partner, next-of-kin, religious counsellor and a medical practitioner of your choice.

(3) As a person arrested for the alleged commission of an offence, you have the following rights:

- (a) You have the right to remain silent and anything you say may be recorded and may be used as evidence against you;
- (b) you are not compelled to make a confession or admission which could be used in evidence against you;
- (c) you have the right to be brought before a court as soon as reasonably possible, but not later than 48 hours after your arrest or the end of the first court day after the expiry of the 48 hours, if the 48 hours expire outside ordinary court hours or on a day which is not an ordinary court day;
- (d) you have the right, at the first court appearance after your arrest, to be informed of the reason for your continued detention, or to be released; and
- (e) you have the right to be released from detention if the interests of justice permit, subject to reasonable conditions.

(4) You can exercise all the abovementioned rights at any stage during your detention.

CERTIFICATE BY DETAINEE

I, ESRAEL MUYISE Damos Nang (name of detainee) hereby certify that I have been informed in ENGLISH (State language) of my rights in terms of the Constitution as set out above by CSG T. SINGH (name of Person who informed the detainee) and that I understand the contents thereof.

DATE: 2024/11/22
(Informed)TIME: 10:15
(Informed)PLACE: Kwa Dukuza
(Informed)

E. M. DAMOS NANG
SIGNATURE/THUMBPRINT OF DETAINEE

T. SINGH
SIGNATURE OF PERSON WHO INFORMED THE DETAINEE

CERTIFICATE BY THIRD PERSON AS WITNESS (If required)

I, _____ (name of person) hereby certify that _____ (name of detainee) has been informed in my presence in _____ (State language) of his/her rights in terms of the Constitution as set out above by _____ (name of person who informed the detainee) and that the contents thereof has been explained to him/her but that he/she refuses to sign the above certificate.

DATE: _____
(Informed)TIME: _____
(Informed)PLACE: _____
(Informed)

SIGNATURE OF THIRD PERSON

MS.

B7

"EN 26" S 3956797

English

NOTICE OF RIGHTS IN TERMS OF THE CONSTITUTION

(SECTION 35 OF ACT NO. 108 OF 1996)

(1) You are being detained for the following reasons:

1. KIDNAPPING

2. EXTORTION

3. Armed Robbery

(2) As a person who is detained you have the following rights:

- (a) you have the right to consult with a legal practitioner of your choice or, should you so prefer, to apply to the Legal Aid Board to be provided by the State with the services of a legal practitioner;
- (b) you have the right to challenge the lawfulness of your detention in person before a court of law and to be released if such detention is unlawful;
- (c) you have the right to be detained under conditions consonant with human dignity, which shall include at least the provision of adequate accommodation, nutrition, reading material and medical treatment at state expense; and
- (d) you have the right to be given the opportunity to communicate with, and be visited by, your spouse or partner, next-of-kin, religious counsellor and a medical practitioner of your choice.

(3) As a person arrested for the alleged commission of an offence, you have the following rights:

- (a) You have the right to remain silent and anything you say may be recorded and may be used as evidence against you;
- (b) you are not compelled to make a confession or admission which could be used in evidence against you;
- (c) you have the right to be brought before a court as soon as reasonably possible but not later than 48 hours after your arrest or the end of the first court day after the expiry of the 48 hours, if the 48 hours expire outside ordinary court hours or on a day which is not an ordinary court day;
- (d) you have the right, at the first court appearance after your arrest, to be informed of the reason for your continued detention, or to be released; and
- (e) you have the right to be released from detention if the interests of justice permit, subject to reasonable conditions.

(4) You can exercise all the abovementioned rights at any stage during your detention.

CERTIFICATE BY DETAINEE

I, EMANUEL MARCOS RAMOS NANCY (name of detainee) hereby certify that I have been informed in ENGLISH (State language) of my rights in terms of the Constitution as set out above by CS T. SINGH (name of Person who informed the detainee) and that I understand the contents thereof.

DATE: 2024/11/22 TIME: 10:15 PLACE: Kwa Dukuza
(Informed) (Informed) (Informed)

EMANUEL MARCOS RAMOS NANCY
SIGNATURE/THUMBPRINT OF DETAINEE

T. SINGH
SIGNATURE OF PERSON WHO INFORMED THE DETAINEE

CERTIFICATE BY THIRD PERSON AS WITNESS (if required)

I, _____ (name of person) hereby certify that _____ (name of detainee) has been informed in my presence in _____ (State language) of his/her rights in terms of the Constitution as set out above by _____ (name of person who informed the detainee) and that the contents thereof has been explained to him/her but that he/she refuses to sign the above certificate.

DATE: _____ TIME: _____ PLACE: _____
(Informed) (Informed) (Informed)

SIGNATURE OF THIRD PERSON

EN
NSOX

ALL

27

IN THE HIGH COURT OF SOUTH AFRICA
KWA-ZULU NATAL LOCAL DIVISION, DURBAN

CASE NO:

In the matter between:

ESMAEL MAULIDE RAMOS NANGY

1ST APPLICANT

STEFANE PEREIRA DA COSTA BRITES

2ND APPLICANT

And

THE STATE - C/O THE DIRECTOR OF
PUBLIC PROSECUTIONS, DURBAN -

1ST RESPONDENT

THE DEPARTMENT OF CORRECTIONAL SERVICES
- WESTVILLE

2ND RESPONDENT

THE MINISTER OF POLICE

3RD RESPONDENT

CONFIRMATORY AFFIDAVIT

I, the undersigned,

SELMA PEREIRA DA COSTA BRITES
(ID NO: 770725 0246 08 2)

do hereby make oath and state that

[Signature]
S.B.
G-1 1/80

ACV

E-7

-2-

1. I am an adult female of full legal capacity and the wife of the Second Applicant.
2. The facts herein contained are within my personal knowledge and unless stated to the contrary, they are both true and correct.
3. I have read the Affidavit and Supporting Affidavit of the 1st and 2nd applicant respectively and confirm the contents thereof insofar as they relate and/or refer to me.
4. Further thereto, this affidavit is made to support the affidavit of my husband, **STEFANE PEREIRA DA COSTA BRITES**, and to provide my account of the events that transpired on and after 19 November 2024, involving his arrest, the extortion attempt, and the violations of our rights by members of the South African Police Service (SAPS).
5. On 19 November 2024, I received a phone call from my husband at 10:08 PM informing me that he and his brother had been arrested by members of the SAPS.
6. During the call, my husband stated that they were being tortured and assaulted by the police officers. He sounded distressed and in pain, and I was unable to ascertain the full extent of his injuries.
7. My husband informed me in addition to this that the torture commenced on Tuesday and continued unabated up until Wednesday the 20th of

S B
B 7
2600

N.Y.

E.7

- 3 -

November 2024. Further thereto my husband was blindfolded and also corroborates the same treatment that had occurred to the first applicant as set out in the first applicant's affidavit.

8. On 20 November 2024, my niece informed me that members of the SAPS had raided hers and my brothers-in-law residence at Midstream Estate.
9. According to my niece during the raid, the officers caused significant property damage while allegedly searching for evidence related to the alleged offence. Furniture was overturned, and several items were broken or removed without explanation. The individuals present at the raid arrived in a variety of vehicles, including Golf 8s, Golf 7s, and several 4x4s. Among the vehicles at the raid was a Hyundai H1, an unmarked vehicle without police license plates, which we believe was used to transport my husband and brother-in-law to KZN.
10. Despite repeated requests by our attorneys and family, the estate management refused to release CCTV footage of the raid, leaving us without critical evidence to corroborate the incident.
11. On 21 November 2024, I received a phone call at 6:58 AM from the number 083 261 4315. The caller was a male who did not identify himself.

SB
G-1
NBPX

14/11

B7

- 4 -

12. The caller began the conversation by saying: "I kidnapped your husband, and the ransom is 10 billion dollars, and I need the money now."
13. When I explained that I did not have such an amount and that I was a housewife, the caller responded: "I am joking. We have your husband; he was arrested, and we are now taking him to KZN."
14. Upon investigating the phone number using Truecaller, I discovered that it was registered to Mohammed Infath Raof, a Captain in the SAPS. When I asked if I could provide our lawyer with this number, the caller refused, stating that he was merely informing me of the arrest as a favor.
15. Neither my husband nor his brother were permitted visitation, access to legal counsel, or any of their constitutional rights available to arrested or detained persons.
16. I attempted to check on my husband's condition at the detention facility but was denied access by the officers present.
17. I confirm that the above statement was done freely and voluntarily without any force or duress, and I have no objection in taking the prescribed oath herein.

B. S.

DEPONENT

SB

E. M. K. D. K.

FL 11

37

- 5 -

SIGNED AND SWORN TO BEFORE ME AT Brakpan ON THIS THE
30th DAY OF November 2024, THE DEPONENT HAVING
 ACKNOWLEDGED IN MY PRESENCE THAT HE KNOWS AND UNDERSTANDS
 THE CONTENTS OF THIS AFFIDAVIT, THE PROVISIONS OF GOVERNMENT
 GAZETTE R1476 OF 11 JULY 1980 AS AMENDED BY GOVERNMENT
 GAZETTE R774 OF 20 APRIL 1982, CONCERNING THE TAKING OF THE
 OATH, HAVING BEEN COMPLIED WITH.



 COMMISSIONER OF OATHS

CAPACITY: Director

FULL NAMES: Surita Ford

PHYSICAL ADDRESS:

COMMISSIONER OF OATHS (RSA)

Surita Ford

Ref no: RO-1870/2020

Shop 48, Mall@Germiston

Off Airport & Midway Road

Dalpark Ext 5, Brakpan



S B

E. 1
2100x

B or

IN THE HIGH COURT OF SOUTH AFRICA
KWA-ZULU NATAL LOCAL DIVISION, DURBAN

CASE NO:

In the matter between:

ESMAEL MAULIDE RAMOS NANGY

1ST APPLICANT

STEFANE PEREIRA DA COSTA BRITES

2ND APPLICANT

And

THE STATE - C/O THE DIRECTOR OF
PUBLIC PROSECUTIONS, DURBAN -

1ST RESPONDENT

THE DEPARTMENT OF CORRECTIONAL SERVICES
- WESTVILLE

2ND RESPONDENT

THE MINISTER OF POLICE

3RD RESPONDENT

CONFIRMATORY AFFIDAVIT

I, the undersigned,

NAZIAH NANGY

do hereby make oath and state that:

1. I am an adult female of full legal capacity and the wife of the First Applicant.
2. The facts herein contained are within my personal knowledge and unless stated to the contrary, they are both true and correct.

LESLIE

6-1
NSAAN AM

57

- 2 -

3. I have read the Affidavit and Supporting Affidavit of the 1st and 2nd applicant respectively and confirm the contents thereof insofar as they relate and/or refer to me.
4. Further thereto, I record as follows:
5. On or about 19 November 2024 at approximately 15h30 I received a phone call from a number unknown to me and described as 060 etc etc.
6. I answered the phone call and could hear a commotion in the background which sounded as though certain individuals were arguing or fighting.
7. I could not make out coherently what the voices were saying but I heard my husband shout out to me on the phone and said Nazlyia Rashid.
8. The call lasted approximately fifteen seconds and then the call was disconnected.
9. Approximately one hour after the first call and at 16h30 I received another call from the same number as recorded above.
10. The voice on the other side which sounded to me like an Indian accent told me the following : Listen here if you don't release the victim Zakariyya, I should tell Dombé that they will cut my husband into pieces and throw him in the bush.
11. I was not even able to respond before the call was disconnected.
12. Approximately 15 - 20 minutes after the second call, I then contacted the number and began recording the calls. The threats continued as can be heard from the recording which has been transcribed and attached hereto marked RN1.
13. I further submit that the recording will be presented on a memory stick for the benefit of the court which can be played at the hearing of this matter.

KUSA

 BM
 box
 BM

BM

- 3 -

14. The calls were chilling and frightening and I wholly believe that they did inflict harm my husband and brother-in-law.
15. The total calls between myself and the number were easily in excess of 15 calls and the recordings presented to this Honourable Court reflects the series of phone calls which took place between 15h30 on Tuesday the 19th of November 2024 until around 10h00 on Wednesday the 20th of November 2024. The phone calls continued well into the early hours of the morning and my husband was forced to speak to me telephonically and I was forced to hear them torture my husband while he begged and pleaded for them to stop and pleaded for me to give them any information relating to my brother.
16. Neither myself nor my husband nor brother have any information related to the allegations of kidnapping of any individuals by the name of Zakariyya, who is unknown to me or any kidnapping whatsoever.
17. In addition thereto, I was asked by the police officers who were torturing my husband to provide them with the cell phone number of my brother named Josphino, and that I was to inform him to release this person named Zakariyya. I repeatedly expressed grave concern at this and told them that I was not aware of any kidnapping, nor any person named Zakariyya, and that I have made numerous attempts to call my brother but to no avail. I then forwarded the number to the police officers in fear that they would continue harming and possibly kill my husband as they have threatened.
18. The inhumane treatment and punishment continued as stated above until Wednesday the 20th of November 2024 where I was forced to listen, and in one of the phone calls on the same day, my husband contacted me again from his WhatsApp number with the police officers listening again closely and begged again to provide any information relating to my brother to the police officers. I once again state that neither myself nor my husband have any knowledge relating to any kidnapping relating to any persons and moreover it is telling that the allegations are not even allegations made against my husband but against my brother whose whereabouts are unknown to me.

EX-11
JOK

104.

57

- 4 -

19. The kidnapping of my husband was used in order to gain leverage as they believed that I had information relating to this alleged kidnapped person.
20. I submit that at no stage whatsoever did I have any information but I am also advised by my attorneys of record that even if I did have the necessary information, the correct procedure would have been for the police officers to simply charge me with regards to withholding information and only in the event that they had relevant evidence of such a case. Again, I submit that neither myself nor my husband have any information relating to the allegations against my brother nor any person alleged to be kidnapped whatsoever.
21. At approximately 14h00 on Wednesday the 20th of November 2024, I was contacted by my 12-year-old minor son who was traumatized by the fact that whilst in the home situated at 18 Old Kent Gate in Midstream on stand number 5777 my minor child who was with two of our domestic workers at the property reported that a number of armed police, some who were uniformed and some who were not uniformed, who did not identify themselves but who bore certain paraphernalia of the SAPS raided our home. I confirm that I was not present at the house and naturally my husband was not present either.
22. As the lawful owner of the property, I confirm that consent was never given to the police, and I confirm that no search or seizure warrant was ever presented to any person and certainly no person who was in control of the property or who was the owner of the property. The police conducted an illegal raid and ransacked our home destroying numerous rooms, furniture and appliances and even committed theft of the following items:
23. The police stole a wall bolted safe by removing the bolts from the wall which contained 5 genuine Rolex watches, some diamond and gold jewellery and other items of extremely high value. In addition, thereto, my Rolex kept on my bedside counter was also stolen, along with money to the value of approximately R50 000.00 (Fifty Thousand Rand) which was kept in my closet.

BY
N.N.
N.N.

10/11/24

E-1

- 5 -

24. I pause to mention that during the entire ordeal my 12-year-old son was forced to watch them and forced to watch them assault my domestic helper when she demanded that they identify themselves to her.
25. I can confirm that the evidence of this raid is in fact contained in the video footage held by the estate's security and confirmed by the necessary security on duty who failed to identify themselves and which estate security has refused to provide the documentary evidence to us.
26. I submit that all of this evidence may easily be obtained by a simple request from by a simple request from the SAPS.
27. I submit that the exact same treatment and incident occurred at my Husband's daughters' home which is situated at number 24 midlands in midstream. I confirm that she informed me that she only became aware of this upon arriving home to find that the power has been disconnected from the property and that the property had been ransacked. The front door had been forced open as can be seen from the various pictures and video footage.
28. Again, I submit that the security on duty can attest to what had transpired and moreover can confirm of the individuals who raided our home were in fact police officers acting without any authority and unlawfully. Following the raid and phone calls on Wednesday I immediately contacted my attorney of record and immediately explained the situation to him and he convinced both myself as well as Jessica to open charges of kidnapping and theft, housebreaking and extortion and we have done so.
29. I submit that on the same day that I found out I attended at the Ollantsofentein police station to report charges of kidnapping and theft, housebreaking and extortion, however the charge officers in Ollantsofentein refused to open the case of kidnapping and said I have to wait 48hrs before opening a case of kidnapping. At approximately 11pm on Thursday 21st November 2024 accompanied by my attorney who, after engaging extensively with the charge office obtained the case number for the above complaints attached as follows: CAS208/11/2024, CAS 209/11/2024.

ACI-

E^m
N
NOR

BTI

-6-

30. I had no contact from any investigating officer in respect to these case numbers. And my husband and Jessica's father (husbands' brother-in-law) remain detained unlawfully and remain subjected to inhumane torture treatment without any hope of it coming to an end.
31. I can confirm that I have been informed by Jessica as well as the first applicants' wife, that the applicants have been continuously tormented, tortured and subjected to painful unending and inhumane treatment.
32. I submit that after I opened the case on Thursday the 21st of November 2024, I became petrified as it then became known to me that the police officers now intended to do harm to myself and my children. Accordingly I turned my phone off and went into hiding until I was notified by my sister-in-law that she had spoken to my husband and that they were in fact in KwaDukuza and were scheduled to make a first appearance on Friday.
33. I, at the time, was unaware of what had transpired but was being informed that their formal bail application had been postponed to the 9th of December 2024.
34. I reiterate that under no circumstances can my husband endure even another minute of the inhumane torture and punishment and his brother in law, the second applicant, have been receiving and accordingly I have been advised by attorney of record that even one minute of unlawful detention is urgent in nature and this honourable court will view it as urgent and require its immediate and permanent end which may lead the first and second applicants immediate release from the unlawful detention.

Nazim M A R Hossain
DEPONENT

E-7
n/k/m

ALV.

5-7

SIGNED AND SWORN TO BEFORE ME AT Centurion ON THIS THE
02 DAY OF NOVEMBER 2024, THE DEPONENT HAVING ACKNOWLEDGED
 IN MY PRESENCE THAT HE KNOWS AND UNDERSTANDS THE CONTENTS
 OF THIS AFFIDAVIT, THE PROVISIONS OF GOVERNMENT GAZETTE R1478
 OF 11 JULY 1980 AS AMENDED BY GOVERNMENT GAZETTE R774 OF 20
 APRIL 1982, CONCERNING THE TAKING OF THE OATH, HAVING BEEN
 COMPLIED WITH.

COMMISSIONER OF OATHS

Magdeline Makhubela
 Reference No: KM201/10
 2123 Hendrik Verwoerd Drive,
 Hennepark, 0157
 Tel: 012 365 3664

COMMISSIONER OF OATHS

CAPACITY: Commissioner

FULL NAMES: Magdeline Makhubela

PHYSICAL ADDRESS: 2123 Hendrik Verwoerd

Hennepark

Centurion 0157

E
 a. 10/11/24

10/11/24

10/11/24

IN THE HIGH COURT OF SOUTH AFRICA
KWA-ZULU NATAL LOCAL DIVISION, DURBAN

CASE NO:

In the matter between:

ESMAEL MAULIDE RANOS NANGY

1ST APPLICANT

STEFANE PEREIRA DA COSTA BRITES

2ND APPLICANT

And

THE STATE - C/O THE DIRECTOR OF
PUBLIC PROSECUTIONS, DURBAN

1ST RESPONDENT

THE DEPARTMENT OF CORRECTIONAL SERVICES
- WESTVILLE

2ND RESPONDENT

THE MINISTER OF POLICE

3RD RESPONDENT

CONFIRMATORY AFFIDAVIT

I, the undersigned,

JESSICA ISMAEL NANGY

do hereby make oath and state that:

JU

E-7
20.06

1-191

E-7

-2-

1. I am an adult female of full legal capacity and the daughter of the First Applicant.
2. The facts herein contained are within my personal knowledge and unless stated to the contrary, they are both true and correct.
3. I have read the Affidavit and Supporting Affidavit of the 1st and 2nd applicant respectively and confirm the contents thereof insofar as they relate and/or refer to me.
4. Further thereto, this affidavit is made to provide my account of the events that transpired during the raid at our residence on 20 November 2024, and to support the affidavits of my father and uncle regarding the conduct of the South African Police Service (SAPS).
5. My father was arrested by members of the SAPS on 19 November 2024 between Kraft Road and the Edenvale off-ramp. He informed me that he was severely assaulted and tortured whilst in police custody.
6. My father called my mother at approximately 10:08 PM on the night of his arrest, describing the assault and torture he was enduring at the hands of the police.
7. Despite his deteriorating condition and difficulty breathing due to the assault, my father was not afforded medical attention, unlike my uncle, who was also assaulted but transported to the hospital only after medical staff insisted.

JPB
 11-11
 NOK

11/11

E-1

-3-

8. On 21 November 2024, my aunt, Selma Pereira Da Costa, received a call at 6:58 AM from the number 083 261 4315.

Remembered called later, 02:00, 11:00, 12:00 on

9. The caller, who did not identify himself initially, stated the following: "I kidnapped your husband and the ransom is 10 billion dollars, and I need the money now." When my aunt explained that she did not have such money and was a housewife, the caller responded: "I am joking. We have your husband; he was arrested and we are now taking him to KZN."

Remembered called later, 03:00 on

10. Using a telephone identification application, Truecaller, the number was identified as belonging to one Mohammed Intath Raof, a Captain in the SAPS.

11. On the 22nd of November 2024, upon arriving at home at approximately 8:00pm, I noticed that my front door had been forced open and that the power had been cut from my house. I entered the property and noticed that my house had been raided, searched and ransacked, and various cupboards and furniture had been broken.

12. In addition thereto, a certain amount of money, approximately R35 000 (Thirty-Five Thousand Rands), that was in my bedside drawer had been stolen. I immediately contacted security, who confirmed that the police were conducting a raid and that it was a police operation in which they could not be involved. When I enquired with the security as to why they did not inform me of this, they responded that the police had instructed them not to contact anyone regarding the raid, as it was a police-sanctioned operation. The security also confirmed that helicopters

JN
E. 17
NSC

HN

B-1

- 4 -

had accompanied the police, who included both plain clothed and uniformed officers, as well as members of a private security company known as Vision Tactical. We were also informed by the security about the vehicles present on the day, which included several Golf 7s, Golf 8s, a Hyundai H1, multiple 4x4s, and Rangers.

13. Following the raid, I immediately informed my aunt, **BELMA PEREIRA DA COSTA BRITES** about the incident. I described the extensive damage caused to our property and the intimidating conduct of the officers.
14. After the raid, I approached the estate management to request access to the CCTV footage of the incident to share with our attorneys. However, my request was denied, and no reasons were provided for their refusal to release the footage.
15. The raid caused significant emotional distress to me and our family. The aggressive manner in which the officers conducted themselves left me feeling unsafe and violated within my own home.
16. The damage to our property has also placed a financial burden on our family, as many of the damaged items are essential to our daily lives.
17. I have been particularly distressed by the treatment of my father during his arrest and detention, as well as the lack of communication and transparency from the authorities regarding his well-being.

UK

B. 7
2150X

PLU

E-7

-5-

18. I confirm that the above statement was done freely and voluntarily without any force or duress, and I have no objection in taking the prescribed oath herein.

Jessica Nongy
DEPONENT

SIGNED AND SWORN TO BEFORE ME AT Brakpan ON THIS THE 30th DAY OF November 2024, THE DEPONENT HAVING ACKNOWLEDGED IN MY PRESENCE THAT HE KNOWS AND UNDERSTANDS THE CONTENTS OF THIS AFFIDAVIT, THE PROVISIONS OF GOVERNMENT GAZETTE R1478 OF 11 JULY 1980 AS AMENDED BY GOVERNMENT GAZETTE R774 OF 20 APRIL 1982, CONCERNING THE TAKING OF THE OATH, HAVING BEEN COMPLIED WITH.

COMMISSIONER OF OATHS
CAPACITY: Director
FULL NAMES: Sunila Ford
PHYSICAL ADDRESS:

COMMISSIONER OF OATHS (RSA)
Sunila Ford
Ref no: RO-19/07/2020
Shed 48, Alamo Camlhal
Chr Airport & Holdings Road
Dalpark Ext 1, Brakpan

Ja
E M
N/A

N/A

E-1

Tel: 012 361 2916
 Fax: 012 368 2966
 Cell: 992 690 5226
 Email: rrcy33@gmail.com



ADVOCATE
**RICARDO
 ARCANGELI**

Centaur Chambers
 38 Ingersoll Avenue
 Lynwood Glen
 Pretoria

DATE : 8 January 2025
YOUR REF : State v Esmeal Maulide Ramos Nangy and two others case no A2190/2024
MY REF : State v Esmeal Maulide Ramos Nangy and two others case no A2190/2024
TO : National Prosecuting Authority

E-mail : ssilverpesaad@npa.gov.za

"PER EMAIL"

Dear Mrs / Miss Silverpesaad,

IN RE: STATE V ESMEAL MAULIDE RAMOS NANGY AND TWO OTHERS MAGISTRATES' COURT FOR THE DISTRICT OF KWADUKUZA CASE NUMBER A2190/2024

1. We trust that you are well.
2. With reference to the above matter which is set down on 22 January 2025 for the purpose of the accused applying for bail. We confirm our arrangement in court at the previous hearing that you would be prepared to receive copies of all three accused's applications for bail via the aforementioned email address and that the accused would receive service of all correspondence and process at ricardo@ricardoarcangeli.co.za (please copy in the email address: info@ricardoarcangeli.co.za).
3. Ideally, we would like to have all three applications served on your office by 14 January 2025.
4. For purpose of the bail applications, we require you to furnish our offices with sufficient information upon which the State relies relating to:
 - 4.1. what allegedly happened?
 - 4.2. what did each of the accused allegedly do in what has alleged to have happened, which caused them to be arrested for allegedly committing the offences?
 - 4.3. what are the exact charges being brought against the accused?

ADVOCATE RICARDO ARCANGELI

1 | Page

Member of the

14/1

2-7

Tel: 012 361 2916
 Fax: 012 365 2906
 Cell: 082 680 5226
 Email: ray33@gmail.com



ADVOCATE
**RICARDO
 ARCANGELI**

Censor Chambers
 35 Ingersoll Avenue
 Lynnwood Glen
 Pretoria

We respectfully contend that this information is necessary to enable each of the accused to be afforded a reasonable opportunity to adduce evidence which satisfies the court that there are exceptional circumstances that exist which in the interest of justice permit their release.

5. At the previous hearing it was indicated that the State would oppose bail. Could you please provide more clarity on the State's position for the purposes of the accused's bail applications.
6. We await to hear from you under full reservation of our clients' rights.

Kind Regards,
Adv. Ricardo Arcangeli
 Direct Tel.: 012 004 2823
 Cell: 082 680 5226
 Email: ricardo@ricardoarcangeli.co.za

ADVOCATE RICARDO ARCANGELI

2 | Page

HLX.

EL

DIRECTOR OF PUBLIC PROSECUTIONS

Organised Crime Component: KwaZulu-Natal
 Tel: +27 31 334 5055 , 88 Joe Slovo Street, 5th floor.
 Southern Life Building, Durban, 4001
 P/Bag X54342, Durban, 4001



Reference: 10/3/5/1-85/2024

Enquiries: S Silverpsad

Tel: 031 - 334 5057

9 January 2025

ADV RICARDO ARCANGELI
CENTAUR CHAMBERS

THE STATE // E.M.R NANGY AND 2 OTHERS
CASE NO: A 2190/2024
CAS NO: KWADUKUZA 230/09/2024

1. The above matter and your letter dated 8 January 2025 refers.
2. The State alleges that on 10 September 2024 Mr. Z. Desai was kidnapped and robbed of his wallet containing both cash and cards of a personal nature such as, but not limited to: bank cards, ID card medical aid card etc. During the said incident firearms were wielded. Subsequently, ransom demands were made for the release of Mr. Desai in the amount of R 35 million. Persons unknown to the State at this stage as well as the accused acted in furtherance of a common purpose to commit the aforementioned offences.
3. In light of the above, the charges preferred against the accused are that of kidnapping, robbery with aggravating circumstances as well as extortion, committed in the furtherance of common purpose.
4. The State is opposed to the accused persons being released on bail as there are factors present that fall within the provisions of Section 60(4)(a)-(e). The bail

Independence Professionalism - Accountability - Credibility

MS

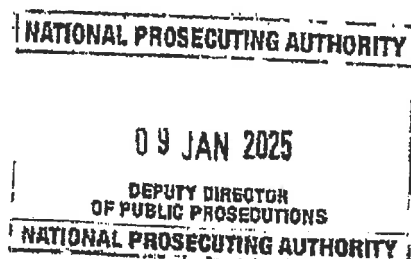
to

application is a Schedule 6 application and will be heard in terms of Section 60 (11)(a) of Act 51 of 1977.

5. With regards to your request in terms of paragraph 4.1 and 4.2, we refer you to Section 60 (14) of Act 51 of 1977.
6. Kindly forward a certified copy of your rights of appearance to appear in the Kwa-Zulu Natal Division, for our records.

Your faithfully,

KS Mawanda
**FOR: DIRECTOR OF PUBLIC PROSECUTIONS
 ORGANISED CRIME COMPONENT
 KWAZULU-NATAL**



Tel: 012 361 2916
 Fax: 012 358 2966
 Cell: 082 680 3326
 Email: ricard33@gmail.com



ADVOCATE
**RICARDO
 ARCANGELI**

Centaur Chambers
 88 Ingersoll Avenue
 Lynnwood Glen
 Pretoria

DATE : 10 January 2025
YOUR REF : 10/3/5/1-85/2024
MY REF : State v Esmeal Maulide Ramos Nangy and two others case no A2190/2024
TO : National Prosecuting Authority

E-mail : ssiverpersad@npa.gov.za and mahendra.naidu@npa.gov.za

"PER EMAIL"

Dear Mrs Siverpersad,

IN RE: STATE V ESMEAL MAULIDE RAMOS NANGY AND TWO OTHERS MAGISTRATES' COURT FOR THE DISTRICT OF KWADUKUZA CASE NUMBER A2190/2024

1. Your email dated 9 January 2025 refers.
2. Our request as contained in our letter dated 8 January 2025 (paragraphs 4.1 and 4.2) was not a request for disclosure of the docket. We respectfully submit that the particulars that you have provided in paragraph 2 of your correspondence dated 9 January 2025 (to which as far as we are aware the accused have not been formally charged with) lack the required particularity the accused reasonably require for purpose of the adjudication their bail applications. We respectfully and collegially refer you to the judgement by Thulare J delivered out of the High Court Western Cape 25 May 2022, reported as *Motsi v S [2022] JOL 54942 (WCC)* from paragraph 8 (attached for your convenience) which deals with similar contentions that we have. Perhaps after considering the judgment, you might reconsider your position in respect of this issue and to limit potential and prejudicial postponements of the bail applications relating hereto.
3. In relation to your request for the writer's right of appearance which entitles appearance in the Kwa-Zulu Natal Division kindly find attached a valid copy of our latest Fidelity Fund Certificate ("the certificate") which *inter alia* confirms that the writer is an advocate in terms of Section 34 (2) (b) ("Trust advocate") of the Legal Practice Act, 28 of 2014 ("the Act"). You can scan the QR code on the certificate to verify the authenticity of the certificate. You would then be aware that in terms of Section 25 (1) and (2) of the Act and the Code of Conduct applicable

ADVOCATE RICARDO ARCANGELI

1 | Page

Ma

[Handwritten signature]

[Handwritten signature]

Tel: 012 361 2916
 Fax: 012 365 2966
 Cell: 082 680 5226
 Email: ricy83@gmail.com



ADVOCATE
**RICARDO
 ARCANGELI**

Contour Chambers
 38 Ingersol Avenue
 Lynnwood Glen
 Pretoria

to all legal practitioners (Government Gazette Notice 29 March 2019) regulation / code 39.1
 that writer is entitled to practice throughout the Republic.

4. We await to hear from you under full reservation of our clients' rights.

Kind Regards,
Adv. Ricardo Arcangeli
 Direct Tel.: 012 004 2823
 Cell: 082 680 5226
 Email: ricardo@ricardoarcangeli.co.za

ADVOCATE RICARDO ARCANGELI

2 | Page

HLL

E-1

DIRECTOR OF PUBLIC PROSECUTIONS

Organised Crime Component: KwaZulu-Natal
 Tel: +27 31 334 5055 88 Joe Slovo Street, 5th floor
 Southern Life Building, Durban, 4001
 P/Bag XS4342, Durban, 4001



Reference: 10/3/5/1-85/2024

Enquiries: S Siverpersad/ Adv M Naidu

Tel: 031 – 334 5057

14 January 2025

ADV RICARDO ARCANGELI
CENTAUR CHAMBERS

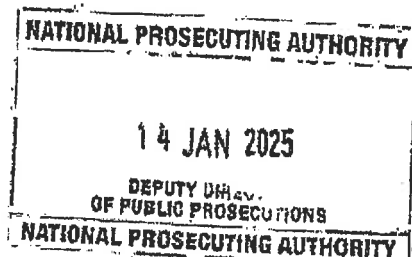
THE STATE v E.M.R NANGY AND 2 OTHERS
CASE NO: A 2190/2024
CAS NO: KWADUKUZA 230/09/2024

1. The above matter and your letter dated 10 January 2025 has reference.
2. The State alleges that the accused are active participants in the kidnapping of the victim and his continued unlawful captivity.

Your faithfully,

KD Arcangeli

FOR: DIRECTOR OF PUBLIC PROSECUTIONS
ORGANISED CRIME COMPONENT
KWAZULU-NATAL



Independence Professionalism Accountability Credibility

NK

8-1

REPUBLIC OF SOUTH AFRICA

CHARGE SHEET

* Make an X in the appropriate block

Police station <i>Kwa-Dukuza</i>	CAS/CR/MAS/IR No. <i>230/01/2024</i>	Case No. _____ Date _____
District/Division <i>Ekurhuleni</i>	Place of trial <i>Kwa-Dukuza District X</i>	Review Case No. _____ Date _____
		Investigation officer <i>Capt. Enoch</i>
		Date of first appearance <i>22/11/2024</i>

Particulars of court officials must be furnished on the minutes of proceedings.

Particulars of accused

THE STATE VERSUS

Name	<i>ESMAD Maudie Renee Ntshing</i>				
Address	<i>16B Marleborn Estate, Centurion, Gauteng</i>				
Male ☒ Female ☐	Nationality	<i>Malawian</i>			Age <i>51 yrs</i>
In custody ☒ On bail ☐ Warned ☐	Date of arrest	<i>20</i>	<i>24</i>	<i>11</i>	<i>20</i>
Name	<i>Stefano Perere De Costa Brites</i>				
Address	<i>House No 20, Orkney Road, Finsbury, Johannesburg</i>				
Male ☒ Female ☐	Nationality	<i>South African</i>			Age <i>57 yrs</i>
In custody ☒ On bail ☐ Warned ☐	Date of arrest	<i>20</i>	<i>24</i>	<i>11</i>	<i>20</i>

(hereinafter called the accused) charged with the offence(s) as set out in Annexure(s) A to _____ as attached.

Place _____ (Date) _____

Judgment _____ (Date) _____

Sentence on _____

Date _____ Magistrate _____ Date of appointment to the rank of Magistrate _____

Direction with regard to return of certificate _____

Direction with regard to filing of case record _____

K11

B-1

ANNEXURE TO CHARGE SHEET

COUNT NO. 02

CASE NO. _____

THE STATE
versus

Faust Muthle Ruvu + Akil
(hereinafter called the accused)

The accused is guilty of the crime of

EXTORTION

In that on or about 17/09/2011 and at or near
Illovo in the District of
Illovo / Regional Division of KwaZulu/Natal, the accused did
unlawfully and intentionally induce or subject to pressure or inspire fear in the mind of
Yusuf Dlamini by
stating to him that he was a Zulu and that he was a member of the Inkatha Freedom Party and that he would be killed unless a ransom in the amount of R300 000 000 was paid for his release

and did then by means of the said threat, inducement or pressure, obtain or attempt to obtain an advantage not due to him / her, to wit

to attempt to raise the funds of R300 000 000 in order to get the ransom to release the victim. The ransom is a part of a syndicate operating in order in the furtherance of a common purpose

K.S.

5-1

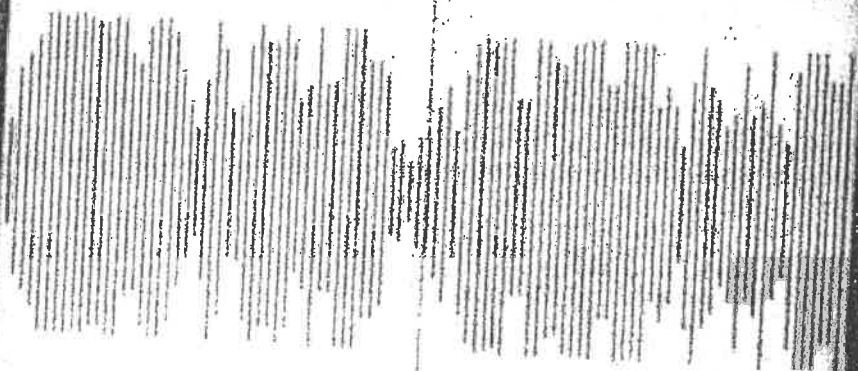


50

00:35

00:54

00:56



00:53

Details

intimidation1.mp3

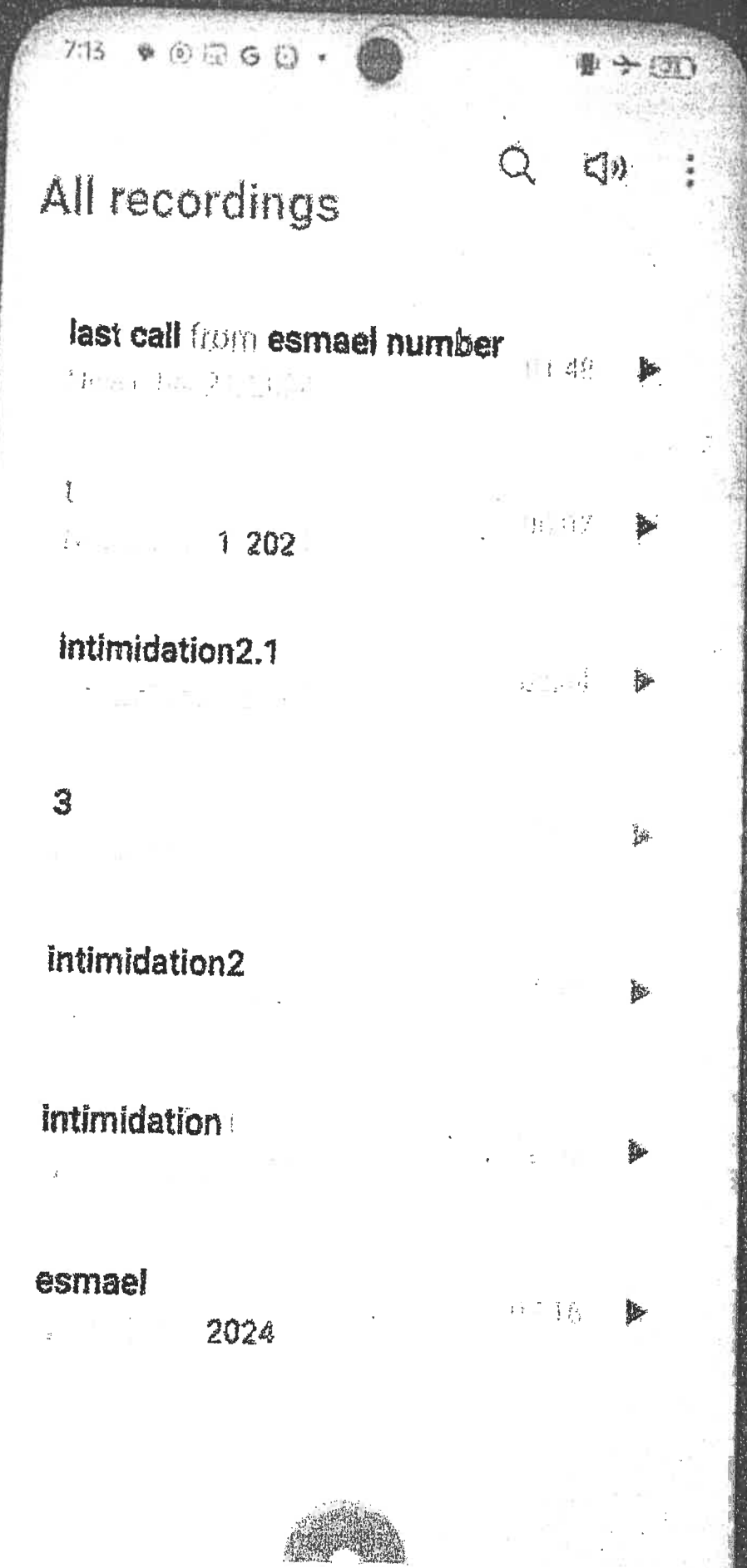
November 19, 2014 10:08:48 PM

6MB

Phone Storage/Music/Recordings/Standard
Recordings/intimidation1.mp3

11/19

EM



1951

EJ

Camera

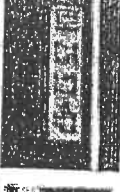
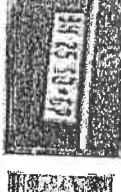
Generated On: 2024-11-22 20:20:05

Camera	Vehicle Licence	Created At	Licence Check	Images
Xfor - Vision Tactical LPR 02	BH25SDGP	2024-11-20 14:05:00	NA	 
Vision Tactical - Norwood Business Forum LPR03	BH25SDGP	2024-11-20 14:01:48	NA	 
Vision Tactical - Norwood Business Forum LPR01	BH25SDGP	2024-11-20 14:01:36	NA	 
Vision Tactical - Norwood Business Forum LPR01	BH25SDGP	2024-11-20 12:58:19	NA	 
Vision Tactical - Norwood Business Forum LPR03	BH25SDGP	2024-11-20 12:58:07	NA	 
Vision Tactical - Norwood Business Forum LPR04	BH25SDGP	2024-11-19 15:33:12	NA	 
Vision Tactical - Norwood Business Forum LPR02	BH25SDGP	2024-11-19 15:33:08	NA	 
Artforum Benoni - Lakeland Ave	BH25SDGP	2024-11-19 14:54:07	NA	 
ALZU - Patroport N4 - Cam 1	BH25SDGP	2024-11-19 13:05:17	NA	 

1021

67

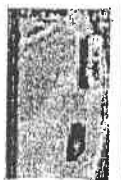
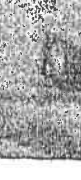
Generated On: 2024-11-22 20:20:05

ALZU - Petroport NA - Cam 2	BH25SDGP	2024-11-18 12:57:10	NA		
XFOR- GRAPHTE SECURITY - RIETPONTEN ROAD	BH25SDGP	2024-11-18 16:42:57	NA		
GID - Site 11 - Spar LPR01	BH25SDGP	2024-11-18 16:18:05	NA		
GID - Site 7 - Alexander Mall LPR01	BH25SDGP	2024-11-18 16:16:03	NA		
GID - Site 7 - Alexander Mall LPR02	BH25SDGP	2024-11-18 16:15:50	NA		
GID - Site 7 - Alexander Mall LPR02	BH25SDGP	2024-11-18 13:14:23	NA		
GID - Site 7 - Alexander Mall LPR01	BH25SDGP	2024-11-18 13:13:58	NA		
GID - Site 11 - Spar LPR01	BH25SDGP	2024-11-18 13:11:12	NA		
LGEP - JBR Cam 1	BH25SDGP	2024-11-18 12:53:12	NA		

112

57

Generated On: 2024-11-22 20:20:05

Xfor - Bredell - Engen Avonlea 3rd Rd	BH26SDGP	2024-11-18 11:22:57	NA		
Xfor - Bredell - Engen Avonlea Motors 2	BH25SDGP	2024-11-18 11:22:14	NA		
CNS - Bredell Plantcor	BH26SDGP	2024-11-18 11:13:16	NA		
CNS - Bredell Plantcor	BH26SDGP	2024-11-18 10:52:39	NA		
Xfor - Bredell - Engen Avonlea 3rd Rd	BH26SDGP	2024-11-18 10:40:58	NA		
VERIFIER/GCJ_MIDSTREAM_RIDGE_TOWER_OUT	BH26SDGP	2024-11-18 10:28:42	NA		
VERIFIER/GCJ_MIDSTREAM_MIDFIELD_TO_RIDGE	BH26SDGP	2024-11-18 10:24:49	NA		
VERIFIER/GCJ_MIDSTREAM_ASCEND_TOWER_IN	BH26SDGP	2024-11-18 10:18:42	NA		
VERIFIER/GCJ_MIDSTREAM_MIDSTREAM_DRIVE_TO_MIDLANDS	BH26SDGP	2024-11-18 10:18:59	NA		

1651

L.B.M.

27

26

Generated On: 2024-11-22 20:20:05

VERIFIER/GCJ_MIDSTREAM_MIDSTREAM_DRIVE_IN	BH25SDGP	2024-11-18 10:18:08	NA		
---	----------	---------------------	----	---	---

Tel: 012 364 2916
 Fax: 012 366 2926
 Cell: 082 680 5226
 Email: rccy32@gmail.com



ADVOCATE
**RICARDO
 ARCANGELI**

Centur Chambers
 38 Ingersol Avenue
 Lynwood Glen
 Pretoria

DATE : 15 January 2025
YOUR REF :
MY REF : State v Esmeal Maulde Ramos Nangy and two others case no A2190/2024
TO : GJGM REGIONAL HOSPITAL

E-mail : Thokozile.Fynn@kznhealth.gov.za; rewan.kanhai@kznhealth.gov.za **"PER EMAIL"**

Good day,

IN RE: STATE V ESMEAL MAULIDE RAMOS NANGY AND TWO OTHERS MAGISTRATES' COURT FOT THE DISTRICT OF KWADUKUZA CASE NUMBER A2190/2024

1. We confirm that we act on behalf of Mr Nangy with Westville prison number 224168821 and Mr Brites with Westville prison number 224169065 ("our clients") who have instructed us to obtain copies of their medical records held at the prison hospital.
2. Kindly find together with this letter our clients signed consent form for purposes thereof in respect of Mr Nangy and Mr Mlotshwa.
3. Our clients instruct that as far as they can remember they were brought to the hospital between 15 November 2024 – 10 December 2024
4. We request that the records be dispatched at your earliest convenience sine our clients intend to use those records at their bail application hearings set down for the 22 January 2025.
5. We await to hear from you.
6. Should you require any further information please contact the writer.

Kind Regards,
Adv. Ricardo Arcangeli
 Direct Tel.: 012 004 2823
 Cell: 082 680 5226

ADVOCATE RICARDO ARCANGELI

1 | Page

mf.

5-9

Tel: 012 361 2916
Fax: 012 365 2866
Cell: 082 680 5226
Email: rcy33@gmail.com



ADVOCATE
**RICARDO
ARCANGELI**

Centaur Chambers
38 Imperial Avenue
Lynnwood Glen
Pretoria

Email: ricardo@ricardoarcangeli.co.za

ADVOCATE RICARDO ARCANGELI

2 | Page

Handwritten signature

Handwritten initials

Ricardo Arcangeli

From: Kader, Adilla <Adilla.Kader@dcs.gov.za>
Sent: Friday, 17 January 2025 07:40
To: Info - Ricardo Arcangeli
Cc: Ricardo Arcangeli; 'Ricardo Arcangeli'
Subject: RE: STATE V ESMEAL MAULIDE RAMOS NANGY AND TWO OTHERS MAGISTRATES' COURT FOT THE DISTRICT OF KWADUKUZA CASE NUMBER A2190/2024:Request for medical records

Morning

Your email is noted.

Please be advised that this office will compile a memorandum and submit to the Regional Coordinator legal services Mr Hlongwane. Mr Hlongwane then forwards his memorandum to the Regional Executive for approval.

Approval is only provided by the Regional Commission KZN. Once we receive the approval we shall compile the documents and contact you accordingly.

We trust the above is in order.

Regards
 A Kader

From: Info - Ricardo Arcangeli <info@ricardoarcangeli.co.za>
Sent: Wednesday, 15 January 2025 13:14
To: Kader, Adilla <Adilla.Kader@dcs.gov.za>
Cc: Ricardo Arcangeli <Ricardo@ricardoarcangeli.co.za>; 'Ricardo Arcangeli' <riccy33@gmail.com>; Info - Ricardo Arcangeli <Info@ricardoarcangeli.co.za>
Subject: STATE V ESMEAL MAULIDE RAMOS NANGY AND TWO OTHERS MAGISTRATES' COURT FOT THE DISTRICT OF KWADUKUZA CASE NUMBER A2190/2024:Request for medical records

Good day ,

With reference to the above matter kindly find the attached:

- correspondence for your urgent attention.
- 2x request for access to records
- Copy of the writer's ID
- The accused consent forms

Our clients require the information so requested for the purpose of their bail application hearing set down for the 22 January 2025.

We await your reply.

Kind regards

Adilla

BT

RICARDO ARCANGELI

LLB - Member of the Bar of the High Court of South Africa

**RICARDO
ARCANGELI**

Tel: 012 381 2918

Cell 082 680 5226

Email: ricardo@ricardoarcangeli.co.za

Centaur Chambers

38 Ingersol Avenue

Lynnwood Glen

Pretoria

***** The Information contained in this e-mail is confidential and may be subject to legal privilege. If you are not the intended recipient, you must not use, copy, distribute or disclose the e-mail or any part of its contents or take any action in reliance on it. If you have received this e-mail in error, please e-mail the sender by replying to this message. All reasonable precautions have been taken to ensure no viruses are present in this e-mail and the sender cannot accept responsibility for loss or damage arising from the use of this e-mail or attachments. If you regard this message as spam, please inform us immediately by sending an email to ITSecurity@dcs.gov.za.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by Mimecast, a leader in email security and cyber resilience. Mimecast integrates email defenses with brand protection, security awareness training, web security, compliance and other essential capabilities. Mimecast helps protect large and small organizations from malicious activity, human error and technology failure; and to lead the movement toward building a more resilient world. To find out more, visit our website.

N/A.

b1

Email Us: Info@Visiontactical.Co.Za



CONTROL
ROOM

084

222

2222

011

014

4700

CONTACT VISION TACTICAL

At Vision Tactical, We're
Passionate About
Security and we will love
to get in contact with you.

E-

Mail: info@visiontactical.co.za

Address: 23 West Street,
Houghton, 2198

Stay informed about your
surroundings as well as
security.

For more information and
to stay informed,
download the [VTAC App](#).

You can also visit [ER24](#)

Get In Touch

Name *

E-Mail *

Subject *

Message *

Email Us: Info@Visiontactical.Co.Za



**SALES - NEW BUSINESS
DEVELOPMENT**

Sameer Cassim

E : sameer@visiontactical.co.za

T : +27 11 014 4700

M : +27 74 332 4000

ACCOUNTS / DEBTORS

Accounts Team – Stacey Born

E : stacey@visiontactical.co.za

T : +27 11 014 4700

E : accounts@visiontactical.co.za

**PAYROLL ADMINISTRATOR -
HR OFFICE**

Salmaan Seedat

E : salmaan@visiontactical.co.za

T : +27 11 014 4700

M : +27 61 467 0828

**COMMUNICATIONS
MANAGER - BRAND &
MARKETING**

Mohamed Ameen Dabhella

E : comms@visiontactical.co.za

T : +27 11 014 4700

M : +27 74 772 3333

ML

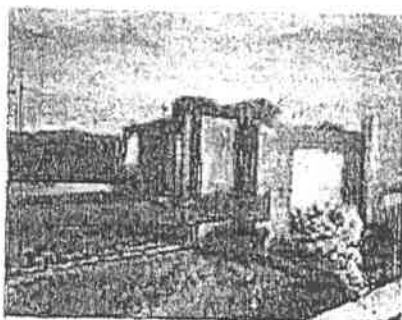
6-1



All / Company News / Crime Update / Events / Success Report



**Vision Tactical: 2024
Year In Review**
December 24, 2024



**PORTUGUESE
BUSINESSMAN
RESCUED, ONE
ARRESTED**
July 2, 2024

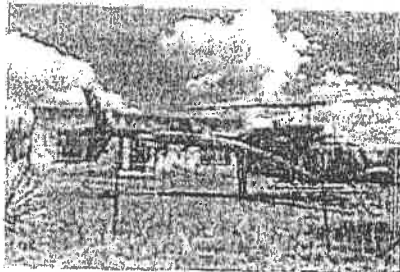
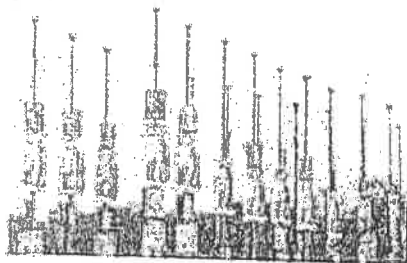
**VISION TACTICAL
JOINS FORCES WITH
CCIN FOR ENHANCED
COMMUNITY SAFETY**

June 8, 2024



**The NatJOINTS
together with the
ProvJOINTS to deploy
ten multi-disciplinary
airborne surveillance
helicopters and drones
for election monitoring
in Gauteng**

May 30, 2024



<https://visiontactical.co.za/news-media-vision-tactical/>





May 25, 2024

19/01/2024



Hijacking, Kidnapping & Murder of Mr. Tinus Van Lingen

February 23, 2024

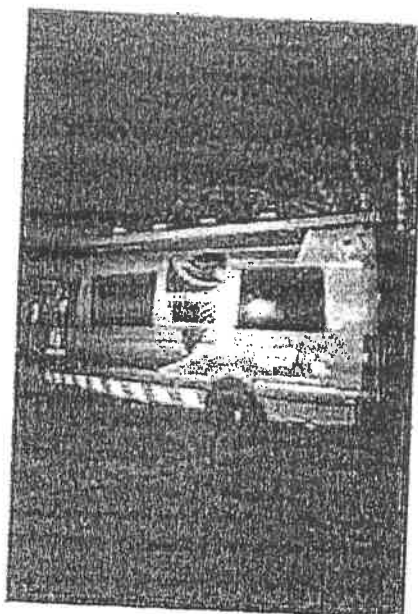


1949. 1950. 1951. 1952. 1953. 1954. 1955. 1956. 1957. 1958. 1959. 1960. 1961. 1962. 1963. 1964. 1965. 1966. 1967. 1968. 1969. 1970. 1971. 1972. 1973. 1974. 1975. 1976. 1977. 1978. 1979. 1980. 1981. 1982. 1983. 1984. 1985. 1986. 1987. 1988. 1989. 1990. 1991. 1992. 1993. 1994. 1995. 1996. 1997. 1998. 1999. 2000. 2001. 2002. 2003. 2004. 2005. 2006. 2007. 2008. 2009. 2010. 2011. 2012. 2013. 2014. 2015. 2016. 2017. 2018. 2019. 2020. 2021. 2022. 2023. 2024. 2025. 2026. 2027. 2028. 2029. 2030. 2031. 2032. 2033. 2034. 2035. 2036. 2037. 2038. 2039. 2040. 2041. 2042. 2043. 2044. 2045. 2046. 2047. 2048. 2049. 2050. 2051. 2052. 2053. 2054. 2055. 2056. 2057. 2058. 2059. 2060. 2061. 2062. 2063. 2064. 2065. 2066. 2067. 2068. 2069. 2070. 2071. 2072. 2073. 2074. 2075. 2076. 2077. 2078. 2079. 2080. 2081. 2082. 2083. 2084. 2085. 2086. 2087. 2088. 2089. 2090. 2091. 2092. 2093. 2094. 2095. 2096. 2097. 2098. 2099. 2100. 2101. 2102. 2103. 2104. 2105. 2106. 2107. 2108. 2109. 2110. 2111. 2112. 2113. 2114. 2115. 2116. 2117. 2118. 2119. 2120. 2121. 2122. 2123. 2124. 2125. 2126. 2127. 2128. 2129. 2130. 2131. 2132. 2133. 2134. 2135. 2136. 2137. 2138. 2139. 2140. 2141. 2142. 2143. 2144. 2145. 2146. 2147. 2148. 2149. 2150. 2151. 2152. 2153. 2154. 2155. 2156. 2157. 2158. 2159. 2160. 2161. 2162. 2163. 2164. 2165. 2166. 2167. 2168. 2169. 2170. 2171. 2172. 2173. 2174. 2175. 2176. 2177. 2178. 2179. 2180. 2181. 2182. 2183. 2184. 2185. 2186. 2187. 2188. 2189. 2190. 2191. 2192. 2193. 2194. 2195. 2196. 2197. 2198. 2199. 2200. 2201. 2202. 2203. 2204. 2205. 2206. 2207. 2208. 2209. 2210. 2211. 2212. 2213. 2214. 2215. 2216. 2217. 2218. 2219. 2220. 2221. 2222. 2223. 2224. 2225. 2226. 2227. 2228. 2229. 2230. 2231. 2232. 2233. 2234. 2235. 2236. 2237. 2238. 2239. 2240. 2241. 2242. 2243. 2244. 2245. 2246. 2247. 2248. 2249. 2250. 2251. 2252. 2253. 2254. 2255. 2256. 2257. 2258. 2259. 2260. 2261. 2262. 2263. 2264. 2265. 2266. 2267. 2268. 2269. 2270. 2271. 2272. 2273. 2274. 2275. 2276. 2277. 2278. 2279. 2280. 2281. 2282. 2283. 2284. 2285. 2286. 2287. 2288. 2289. 2290. 2291. 2292. 2293. 2294. 2295. 2296. 2297. 2298. 2299. 2300. 2301. 2302. 2303. 2304. 2305. 2306. 2307. 2308. 2309. 2310. 2311. 2312. 2313. 2314. 2315. 2316. 2317. 2318. 2319. 2320. 2321. 2322. 2323. 2324. 2325. 2326. 2327. 2328. 2329. 2330. 2331. 2332. 2333. 2334. 2335. 2336. 2337. 2338. 2339. 2340. 2341. 2342. 2343. 2344. 2345. 2346. 2347. 2348. 2349. 2350. 2351. 2352. 2353. 2354. 2355. 2356. 2357. 2358. 2359. 2360. 2361. 2362. 2363. 2364. 2365. 2366. 2367. 2368. 2369. 2370. 2371. 2372. 2373. 2374. 2375. 2376. 2377. 2378. 2379. 2380. 2381. 2382. 2383. 2384. 2385. 2386. 2387. 2388. 2389. 2390. 2391. 2392. 2393. 2394. 2395. 2396. 2397. 2398. 2399. 2400. 2401. 2402. 2403. 2404. 2405. 2406. 2407. 2408. 2409. 2410. 2411. 2412. 2413. 2414. 2415. 2416. 2417. 2418. 2419. 2420. 2421. 2422. 2423. 2424. 2425. 2426. 2427. 2428. 2429. 2430. 2431. 2432. 2433. 2434. 2435. 2436. 2437. 2438. 2439. 2440. 2441. 2442. 2443. 2444. 2445. 2446. 2447. 2448. 2449. 2450. 2451. 2452. 2453. 2454. 2455. 2456. 2457. 2458. 2459. 2460. 2461. 2462. 2463. 2464. 2465. 2466. 2467. 2468. 2469. 2470. 2471. 2472. 2473. 2474. 2475. 2476. 2477. 2478. 2479. 2480. 2481. 2482. 2483. 2484. 2485. 2486. 2487. 2488. 2489. 2490. 2491. 2492. 2493. 2494. 2495. 2496. 2497. 2498. 2499. 2500. 2501. 2502. 2503. 2504. 2505. 2506. 2507. 2508. 2509. 2510. 2511. 2512. 2513. 2514. 2515. 2516. 2517. 2518. 2519. 2520. 2521. 2522. 2523. 2524. 2525. 2526. 2527. 2528. 2529. 2530. 2531. 2532. 2533. 2534. 2535. 2536. 2537. 2538. 2539. 2540. 2541. 2542. 2543. 2544. 2545. 2546. 2547. 2548. 2549. 2550. 2551. 2552. 2553. 2554. 2555. 2556. 2557. 2558. 2559. 2560. 2561. 2562. 2563. 2564. 2565. 2566. 2567. 2568. 2569. 2570. 2571. 2572. 2573. 2574. 2575. 2576. 2577. 2578. 2579. 2580. 2581. 2582. 2583. 2584. 2585. 2586. 2587. 2588. 2589. 2590. 2591. 2592. 2593. 2594. 2595. 2596. 2597. 2598. 2599. 2600. 2601. 2602. 2603. 2604. 2605. 2606. 2607. 2608. 2609. 2610. 2611. 2612. 2613. 2614. 2615. 2616. 2617. 2618. 2619. 2620. 2621. 2622. 2623. 2624. 2625. 2626. 2627. 2628. 2629. 2630. 26

VISION TACTICS • IMAGE DYNAMICS
 10000 10000 10000 10000 10000
 Time: 9:00 - 4:00 PM
 Date: 7th February 2025

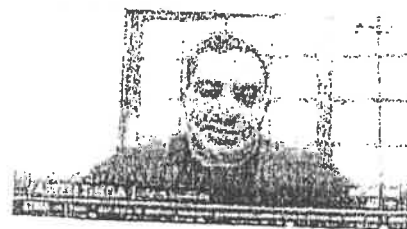
Vislon Tactical – Blood Drive

February 18, 2024



**VISION TACTICAL
TAKES STRONG
STANCE ON SAFETY
AND SECURITY AMID
SOUTH AFRICA'S
LOAD SHEDDING
CRISIS**

February 12, 2024



Crime In SA | Kidnappings on the rise despite task team

February 8, 2024

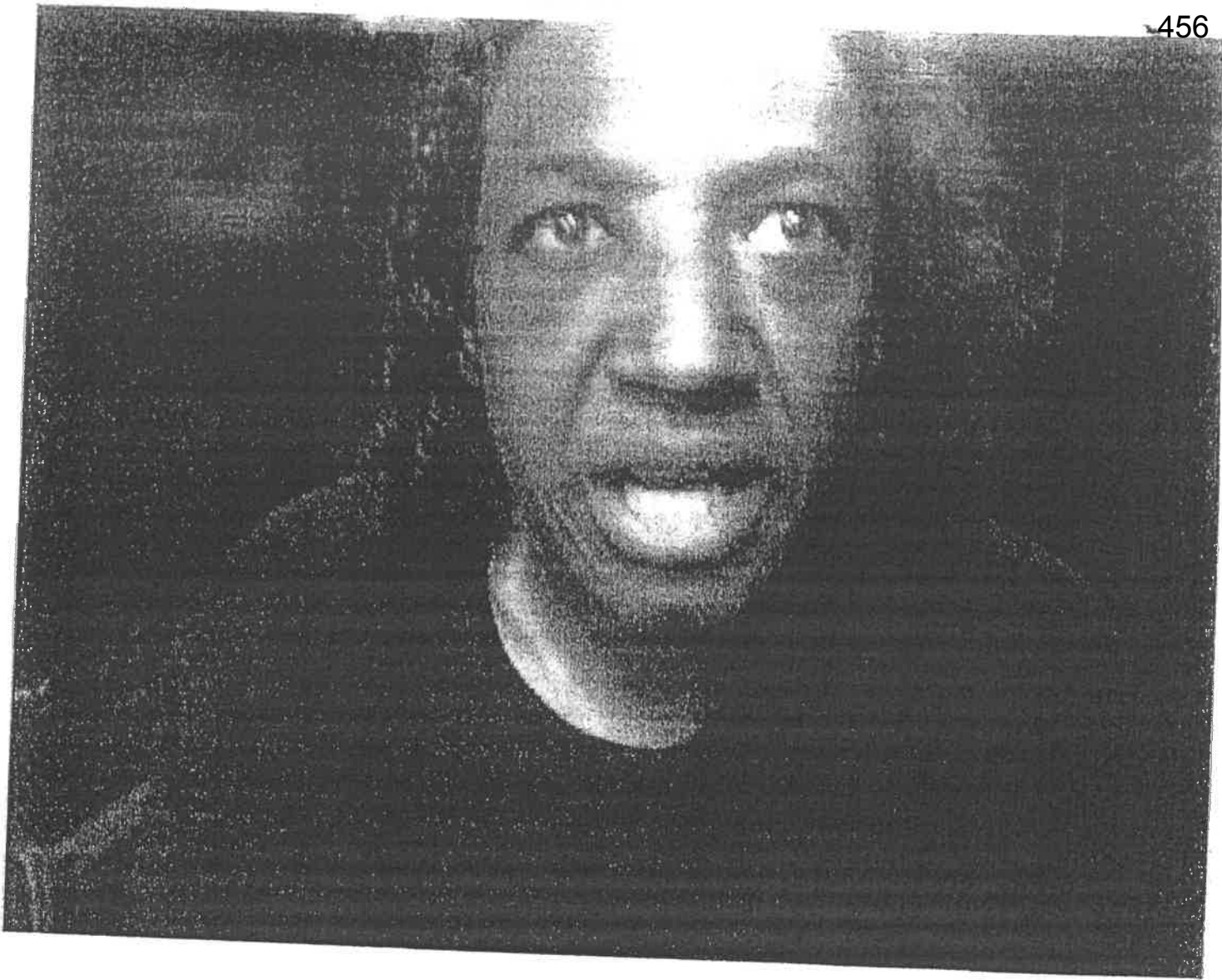
45

5



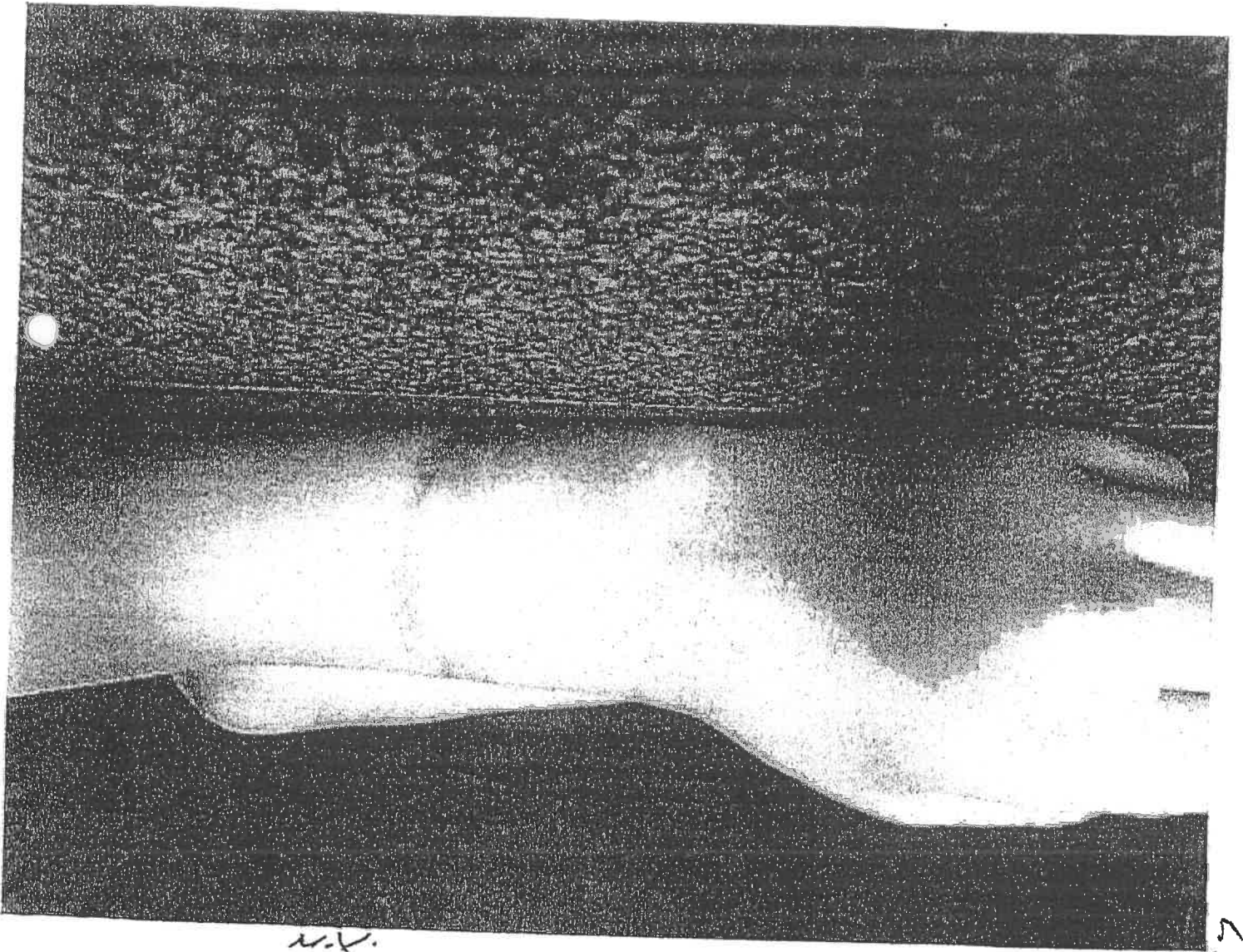
Handwritten signature

Handwritten initials 'TS' with a checkmark



HS.

5

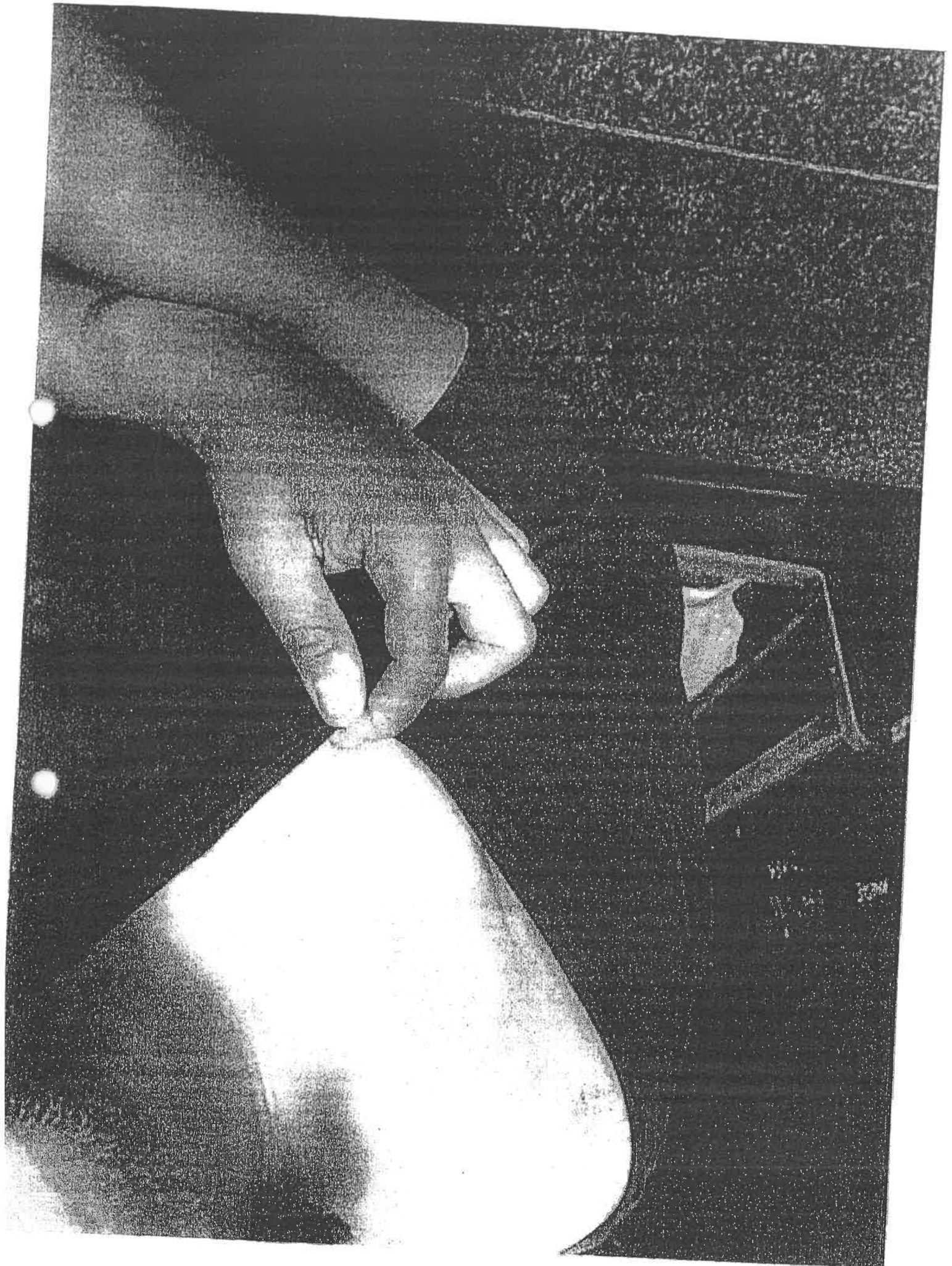


W.H.

72

/H

k 2





URGENT!!!

DATE : 17 February 2025

YOUR REF : SAP 13

MY REF : State v Esmeal Maulide Ramos Nangy and Two Others Case No A2190/2024
TO : "Captain Enoch"

E-mail : enocha@saps.gov.za (Directorate of Priority Crimes)

"PER EMAIL"

WhatsApp : 071 481 2822

E-mail : Shika S. Siverpersad SSiverpersad@npa.gov.za (Public Prosecutor)

Dear Captain Azile Enoch,

ESMAEL MULIDE RAMOS NANGY & 2 OTHERS
CASE NO.: A2190/2024: RETURN OF ACCUSED'S PROPERTY

1. We act on behalf of:

- 1.1. **ESMAEL MAULIDE RAMOS NANGY;**
- 1.2. **SETEFANE PEREIRA DA COSTA BRITES; and**
- 1.3. **SAMKELISO MLOTSHWA;**

(hereinafter referred to as "**the clients**") in this matter, who have instructed that we direct this letter to you.

2. As you are aware, the criminal charges against our clients were withdrawn on 22 January 2025 at the KwaDukuza Magistrates Court.
3. After their release and on the same day, we attempted to obtain the return of our clients' property which was taken by the Police pursuant to their unlawful arrest, detention and prosecution. We communicated this with you on the 22 January 2025 and you agreed that you

ADVOCATE RICARDO ARCANGELI

Tel: 012 361 2916
 Fax: 012 365 2966
 Call: 082 680 5226
 Email: riccy33@gmail.com



ADVOCATE
**RICARDO
 ARCANGELI**

Centaur Chambers
 38 Ingersol Avenue
 Lynnwood Glen
 Pretoria

would provide the necessary consent to (to the Policewoman dealing with the SAP 13's) enable us to obtain our clients property, more fully described hereinbelow.

4. However, when we attended the Stanger Police Station during which attempts were made to get hold of you via cell phone, because our clients did not have the requisite slips for the return of the property (which they inform us they were not furnished with), you were unreachable.
5. We are instructed that the property that was seized under your command consists of:
 - 5.1. cellular phones – iPhone 12 “gold”
 - 5.2. Brown wallet – Selim
 - 5.3. Passports
 - 5.4. Drivers licence
 - 5.5. Bank cards – Black ABSA
 - 5.6. identity documents
 - 5.7. R18 000.00 (“Eighteen Thousand Rand”) cash that was in a folder inside the Mercedes Benz.
 - 5.8. Mercedes Benz, with registration number BH25SDGP together with the “car papers”.
 - 5.9. Mr Nangy’s safe
 - 5.10. 4 Rolex watches each valued at approximately \$ 16 000 USD
 - 5.11. Versace bracelet valued at \$ 1900 USD
 - 5.12. bank cards.
 - 5.13. Mrs Nangy’s R 35 000.00 (“Thirty Five Thousand Rand”)
 - 5.14. Mts Nangy’s MacBook pro
 - 5.15. Mr Brites cell phones
 - 5.16. Mr Molotshwas cell phone
 - 5.17. Mr Molotshwa’s sons PlayStation 5 and joy stick
 - 5.18. Mr Molotshwa’s service pistol with two magazines
 - 5.19. Mr Molotshwa’s Guess watch
 - 5.20. Mr Molotshwa’s Laptop Hp Elietebook x 360

Tel: 012 361 2916
 Fax: 012 365 2966
 Cell: 082 680 5226
 Email: riccy33@gmail.com



ADVOCATE
**RICARDO
 ARCANGELI**

Centaur Chambers
 38 Ingersol Avenue
 Lynnwood Glen
 Pretoria

5.21. Mr Molotshwa's Tag Heuer watch

6. Our clients reserve their rights to amplify and add to the aforementioned list should it be necessary.
7. Save for when the on the one occasion answered your phone which you indicated you were on leave and that you provided us with your email address, all further attempts to telephonically contact you to arrange to uplift our clients' property have come to zero.
8. The impression that we are left with is that you are purposefully avoiding dealing with the issues pertaining to our clients' property particularly the Mercedes Benzes.
9. We therefore demand that you, within 5 ("Five") days from date of this letter, indicate to us when we may collect our clients' aforementioned property, failing which and without further notice to you or the State we will bring an application to the Durban High Court for return of the said property with the appropriate cost's orders.
10. Naturally all of our clients' rights in their totality remain strictly reserved.


 Kind Regards,

Adv. Ricardo Arcangeli

Trust Account Advocate

LPC Firm Number: 65466

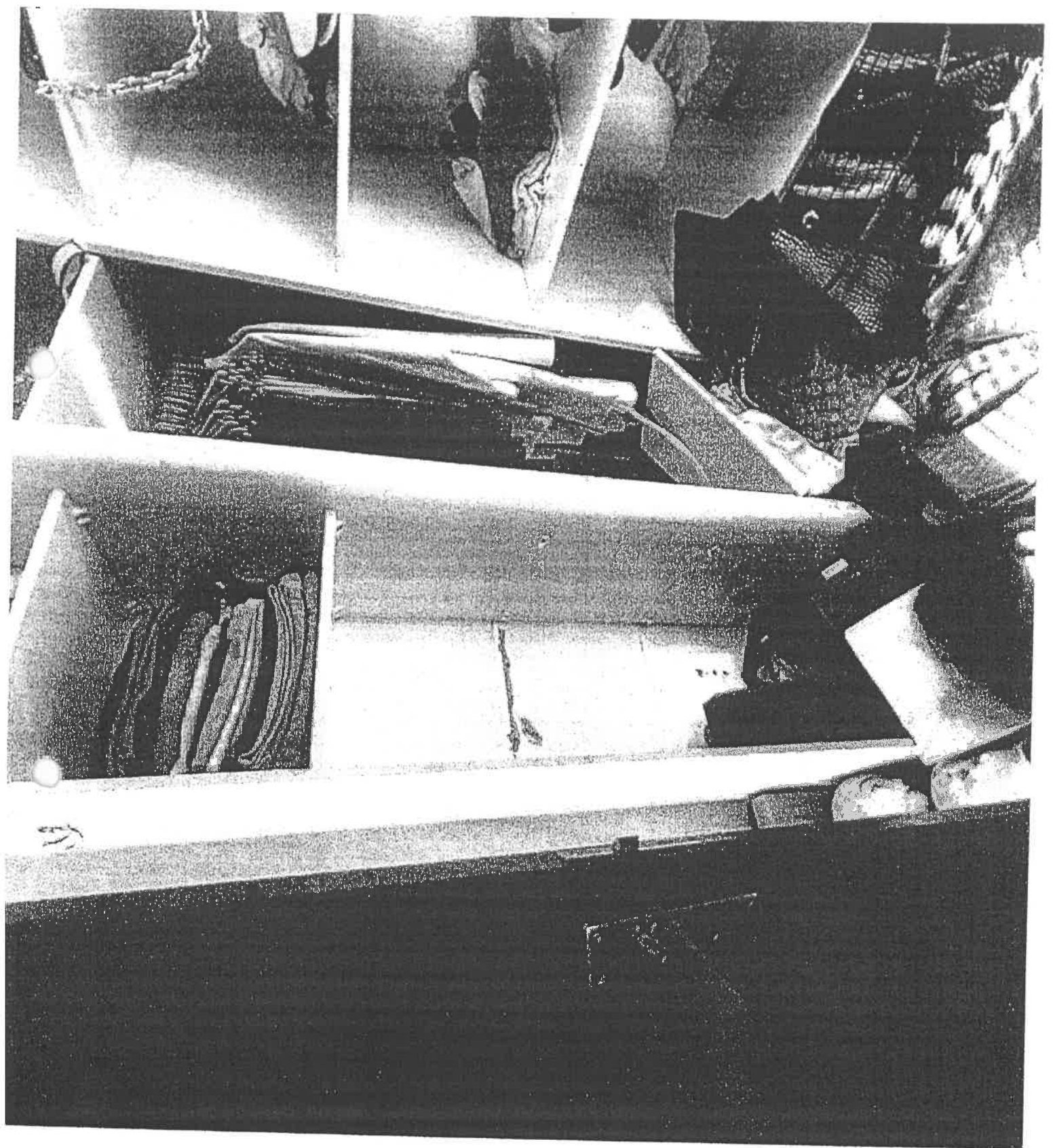
LPC Member Number: 27169

Direct Tel.: 012 004 2823

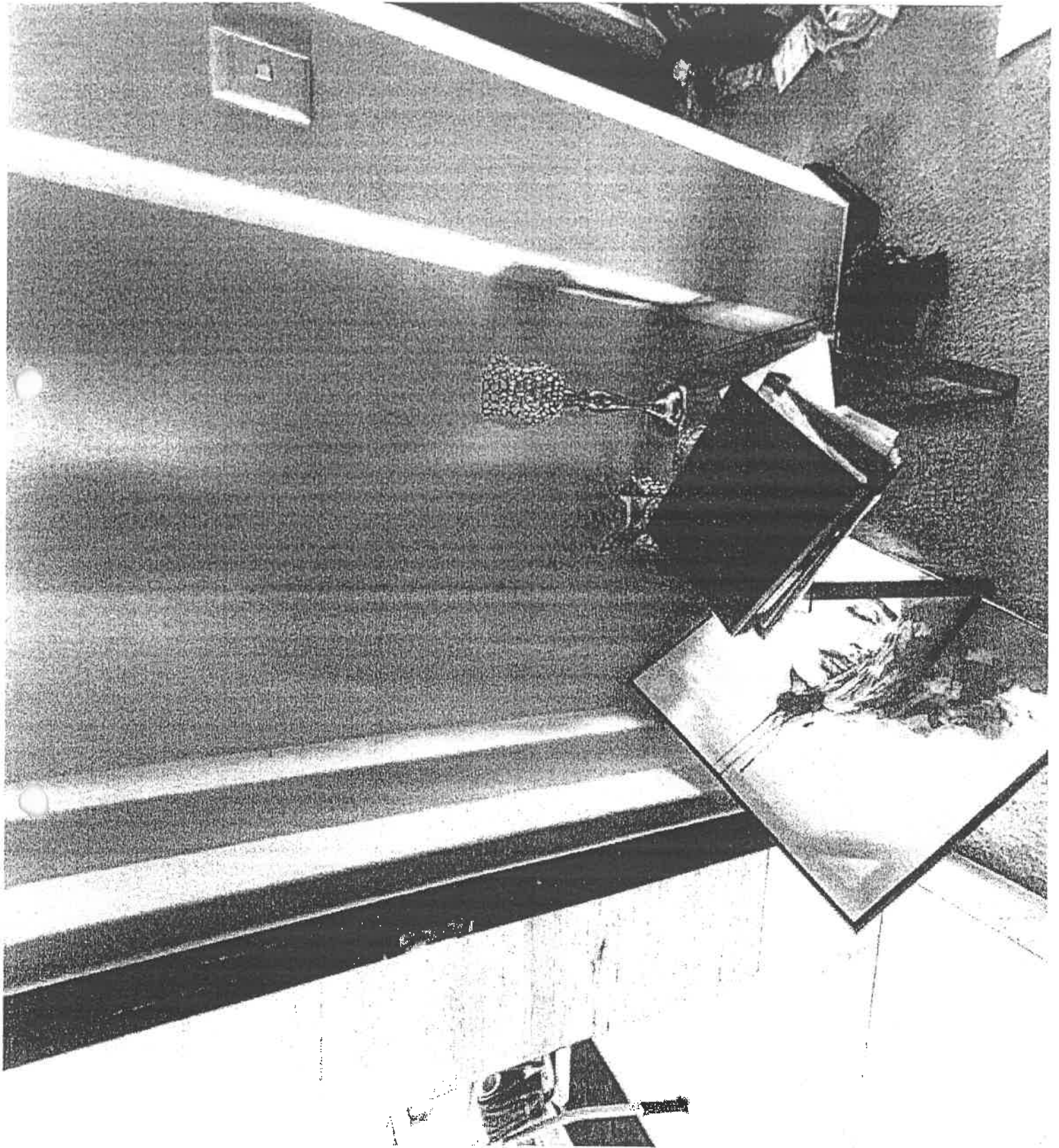
Cell: 082 680 5226

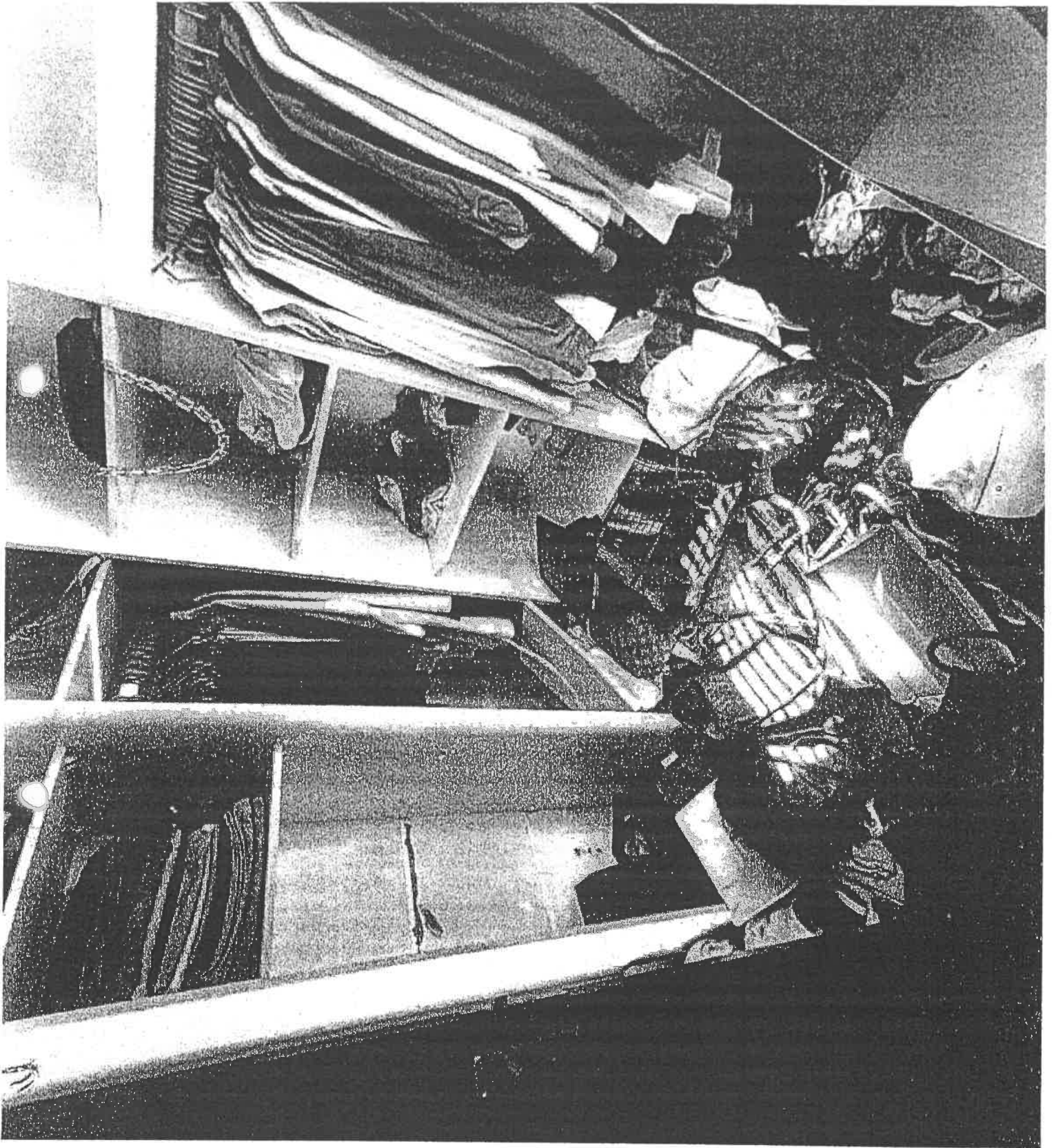
Email: ricardo@ricardoarcangeli.co.za (preferred method)

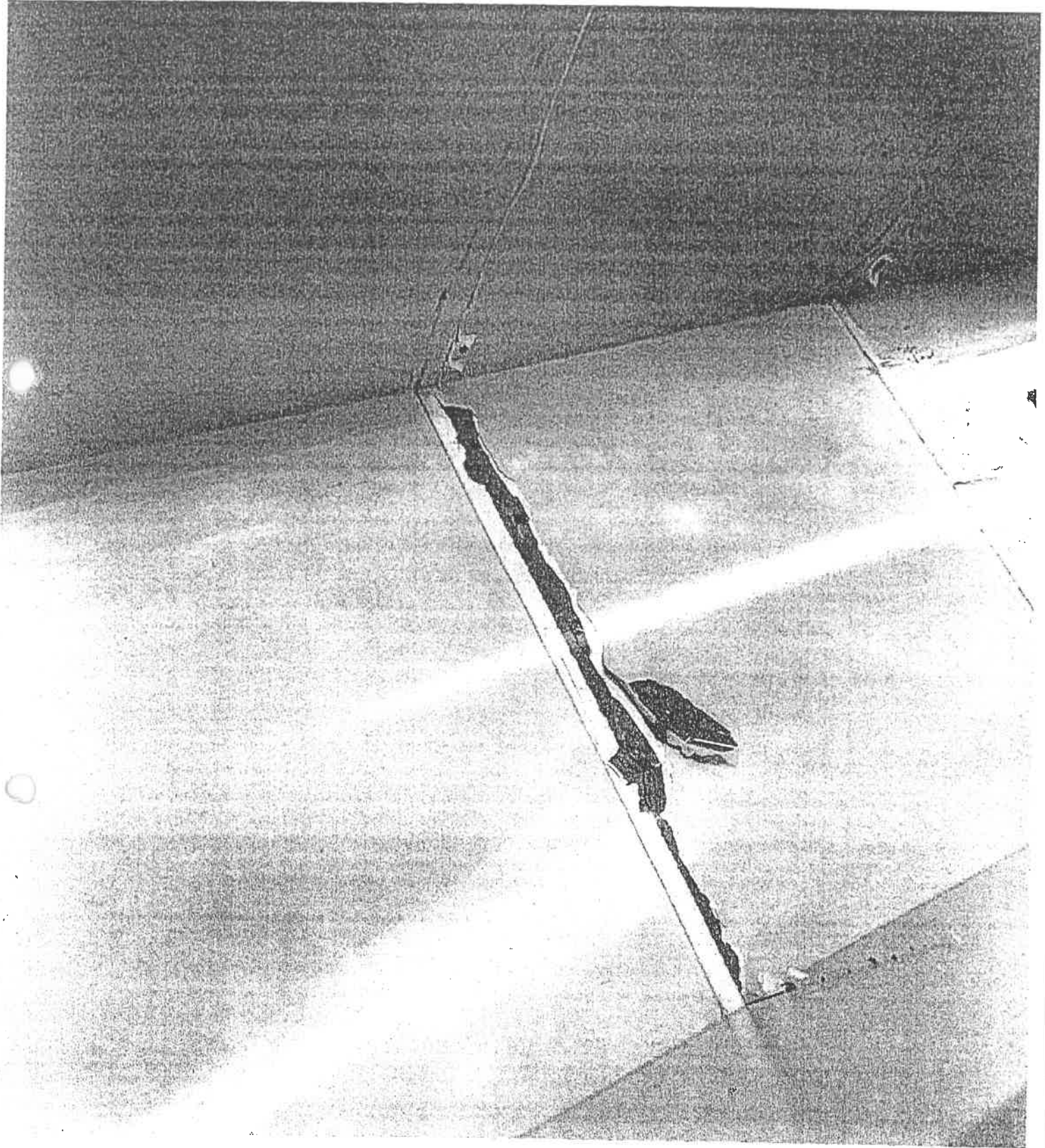
PS. The Republic of South Africa is one sovereign, democratic state founded on inter alia the Supremacy of the constitution and the rule of law. Any conduct inconsistent with the constitution is invalid and the obligations imposed by the constitution must be fulfilled.



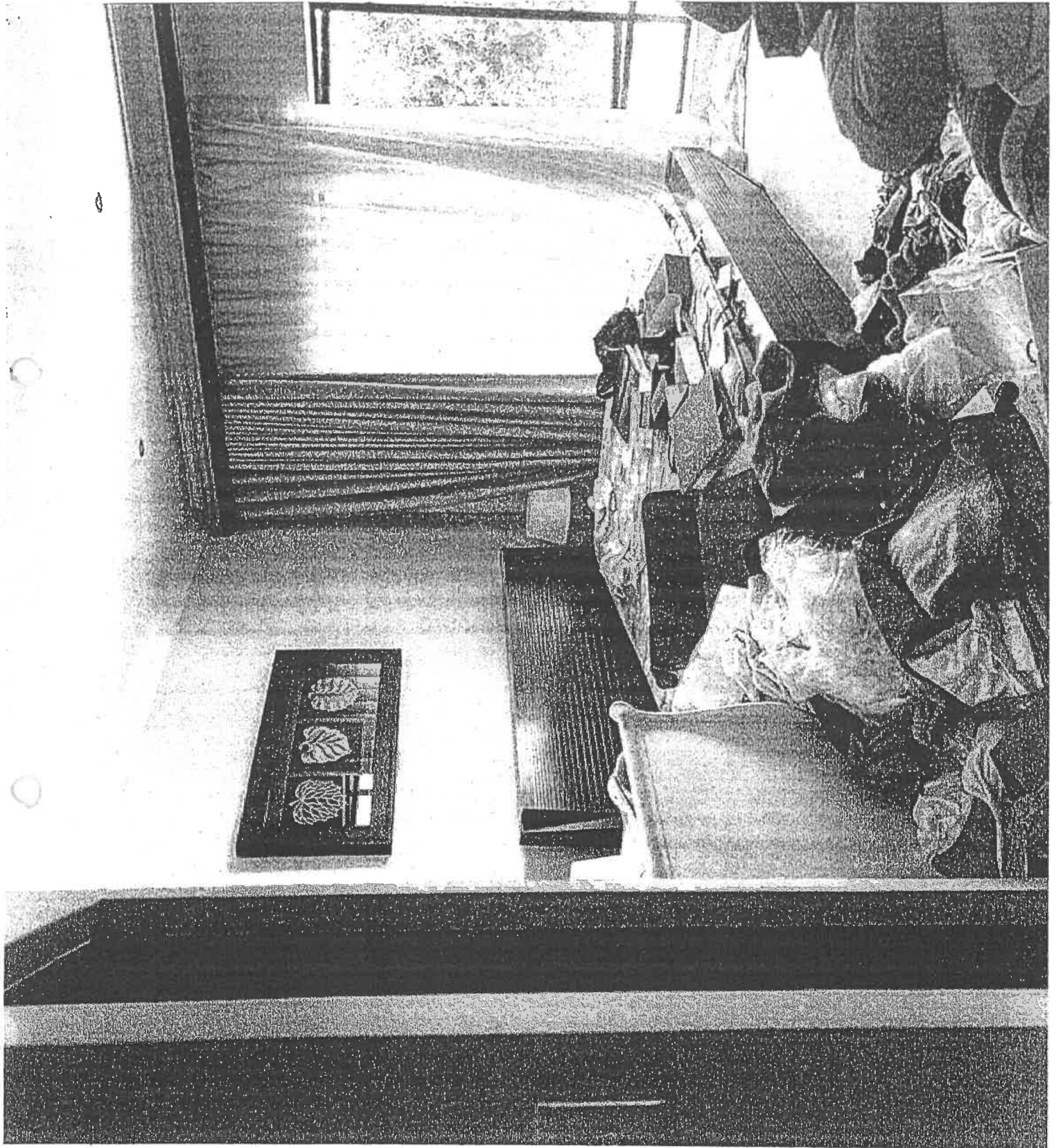




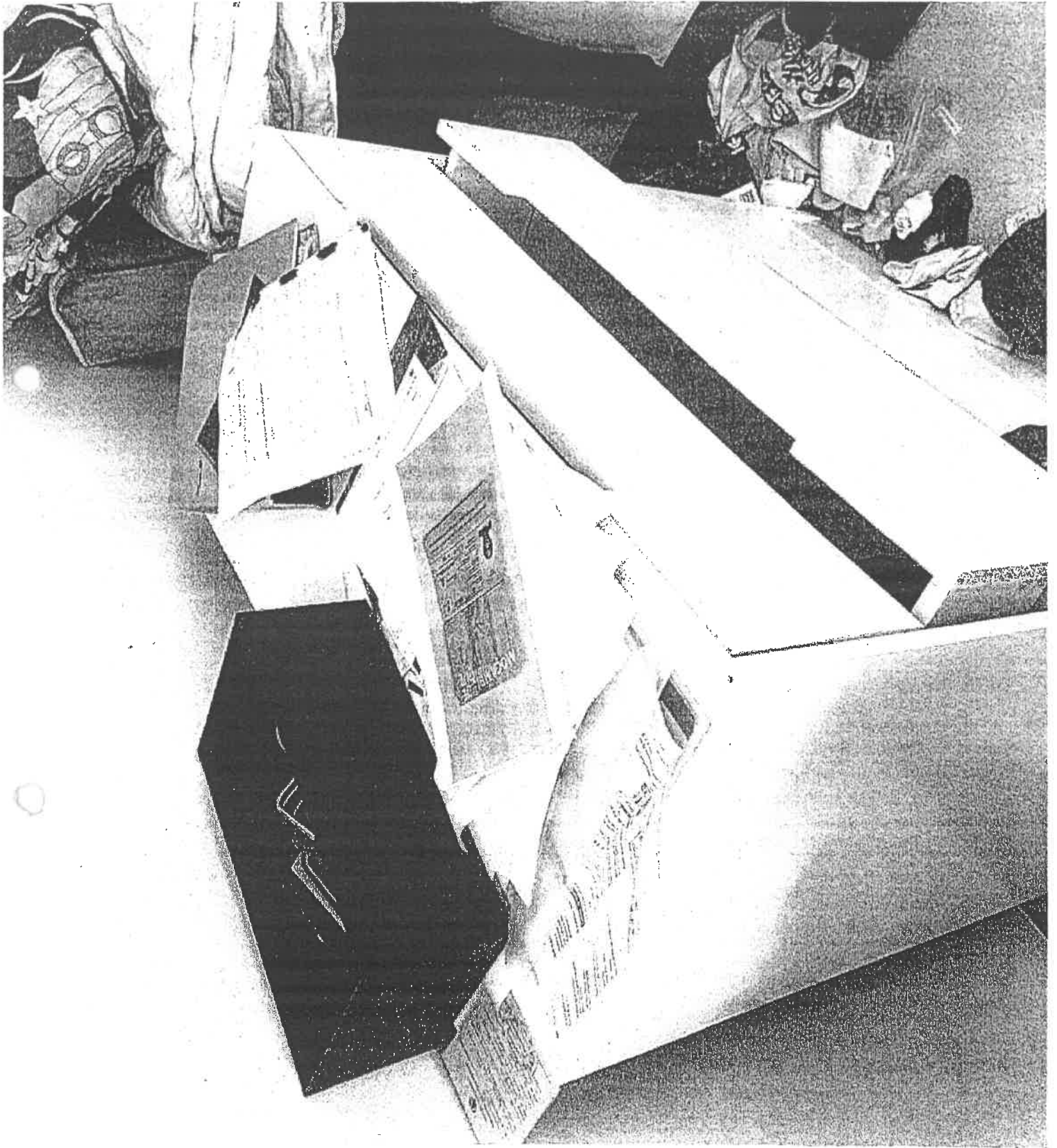


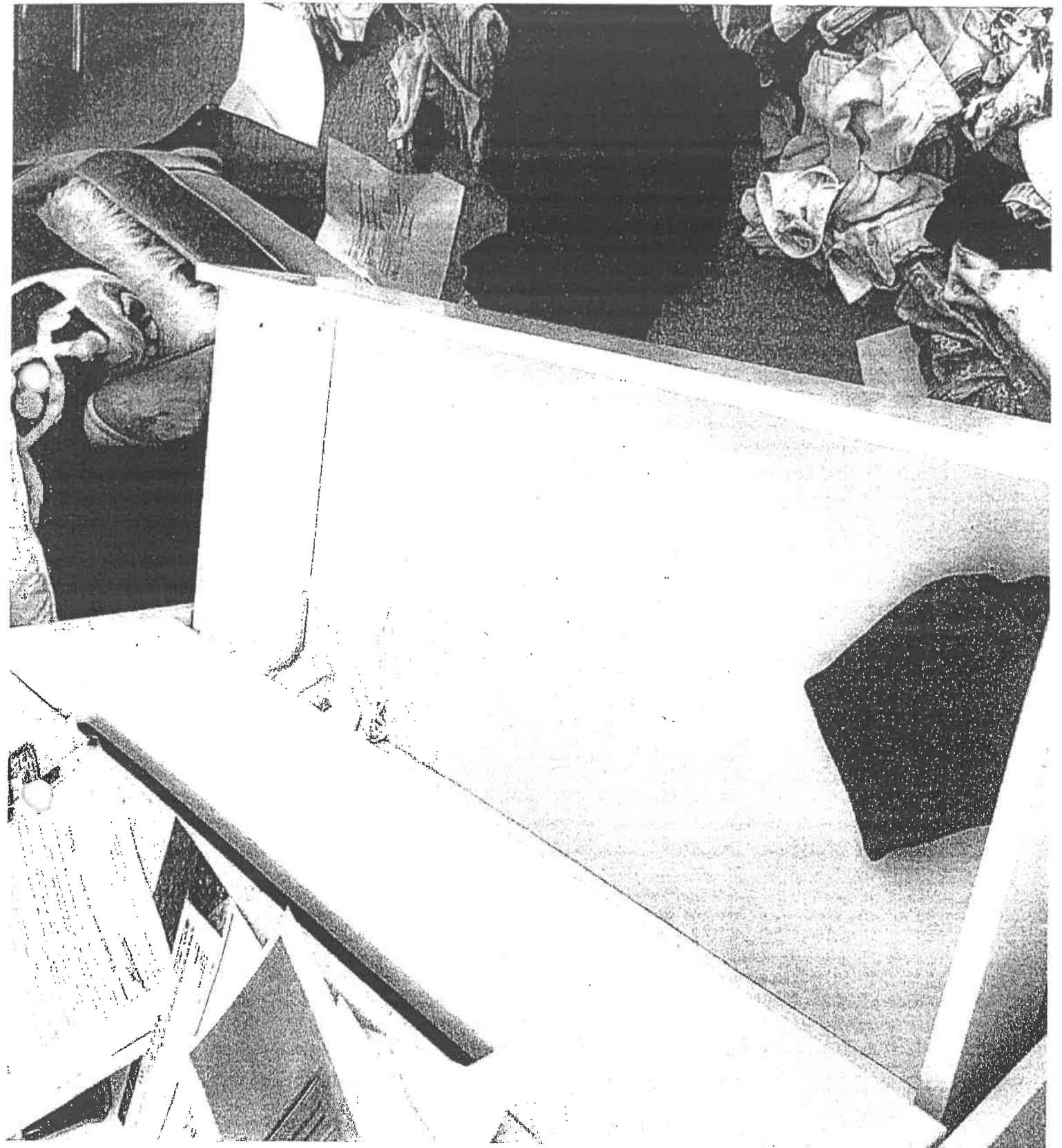


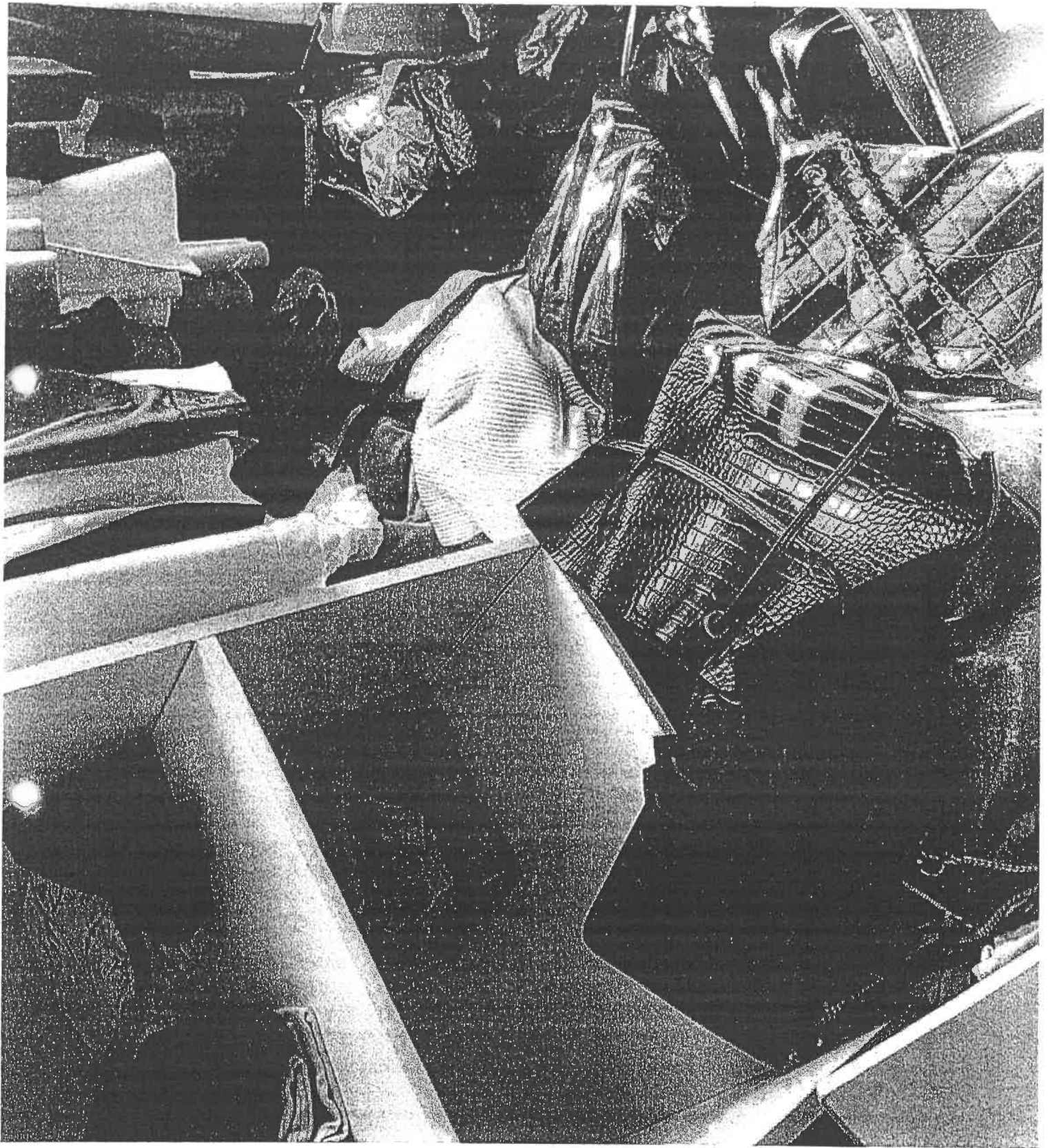




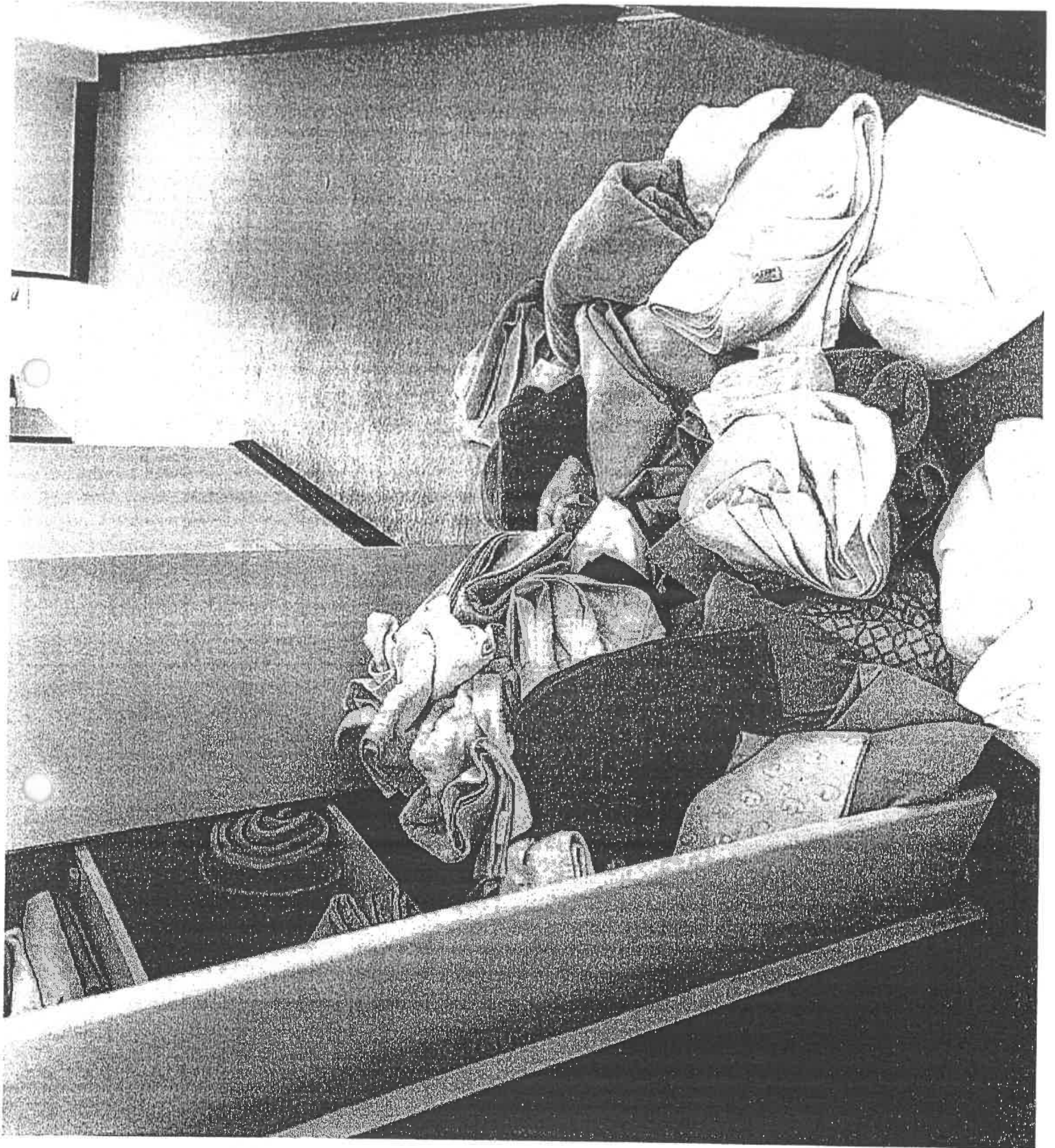


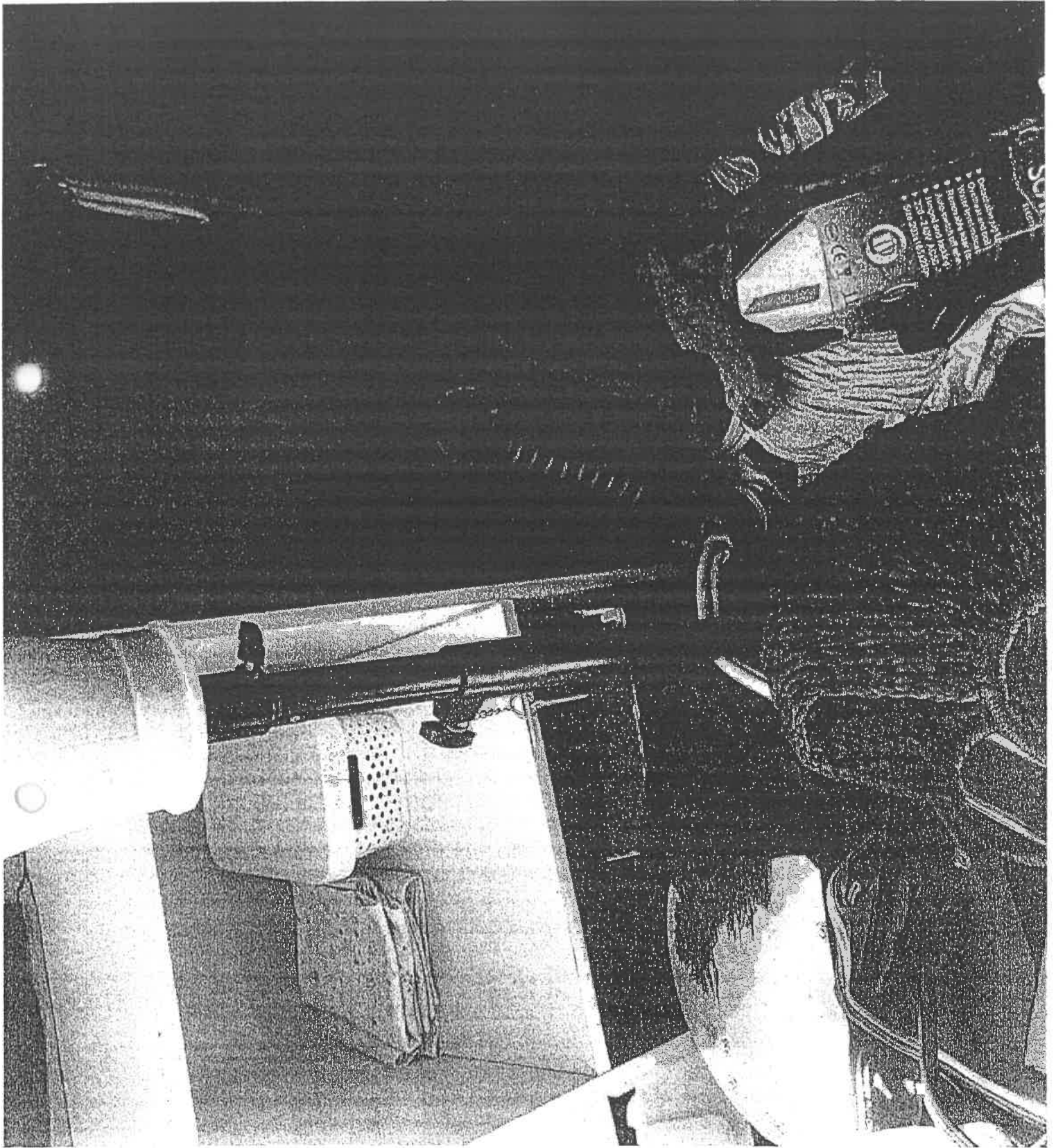




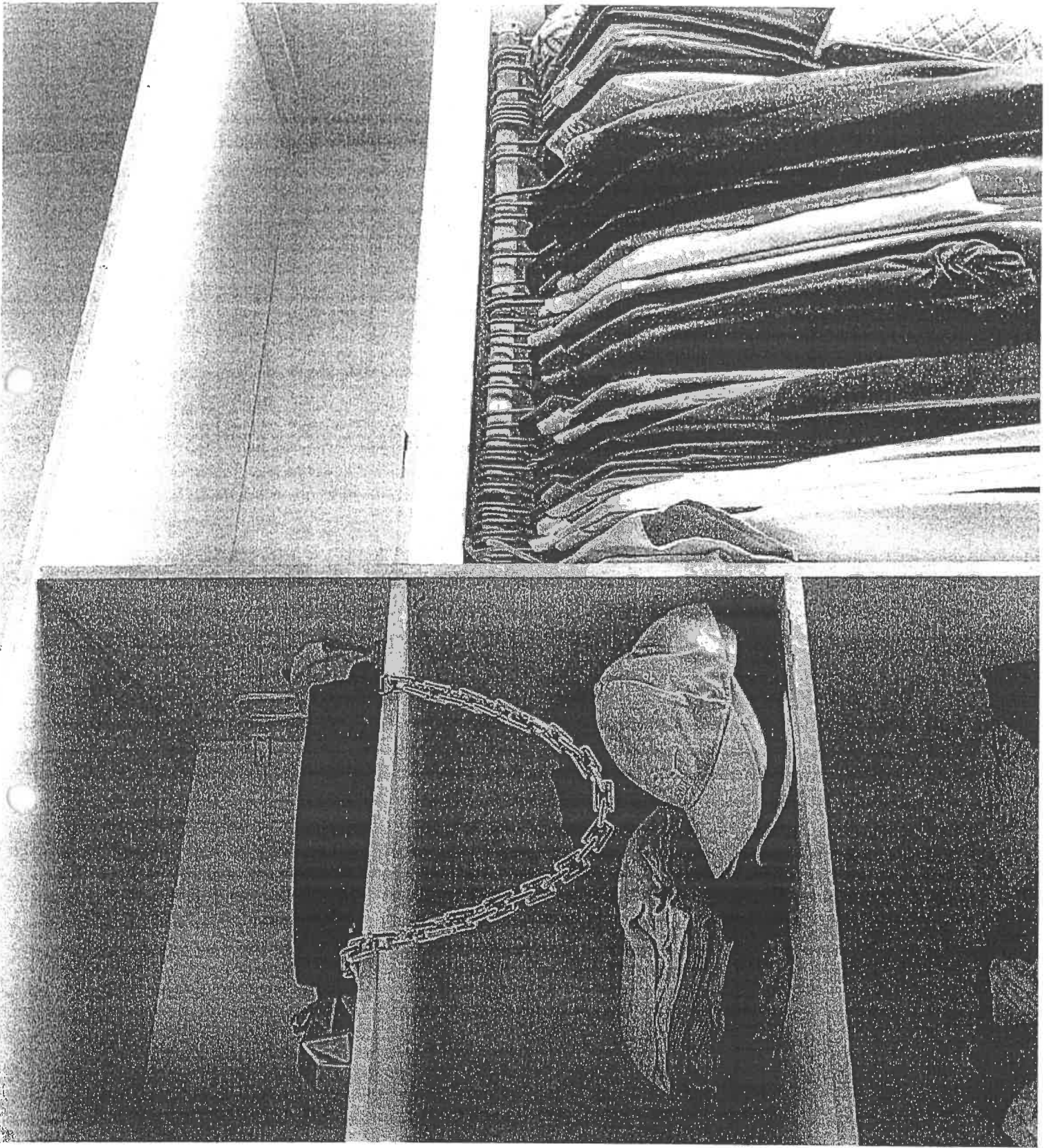


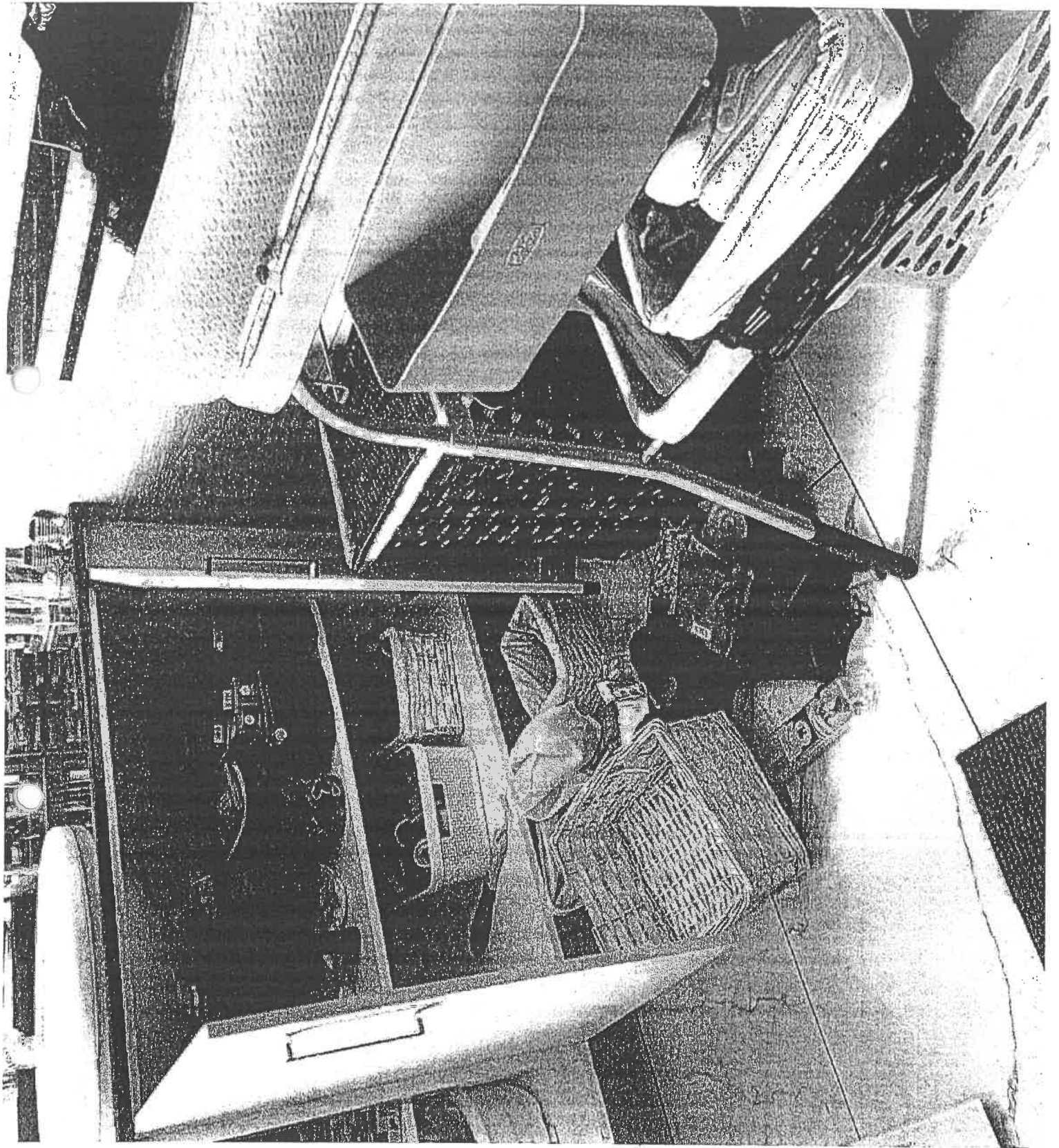


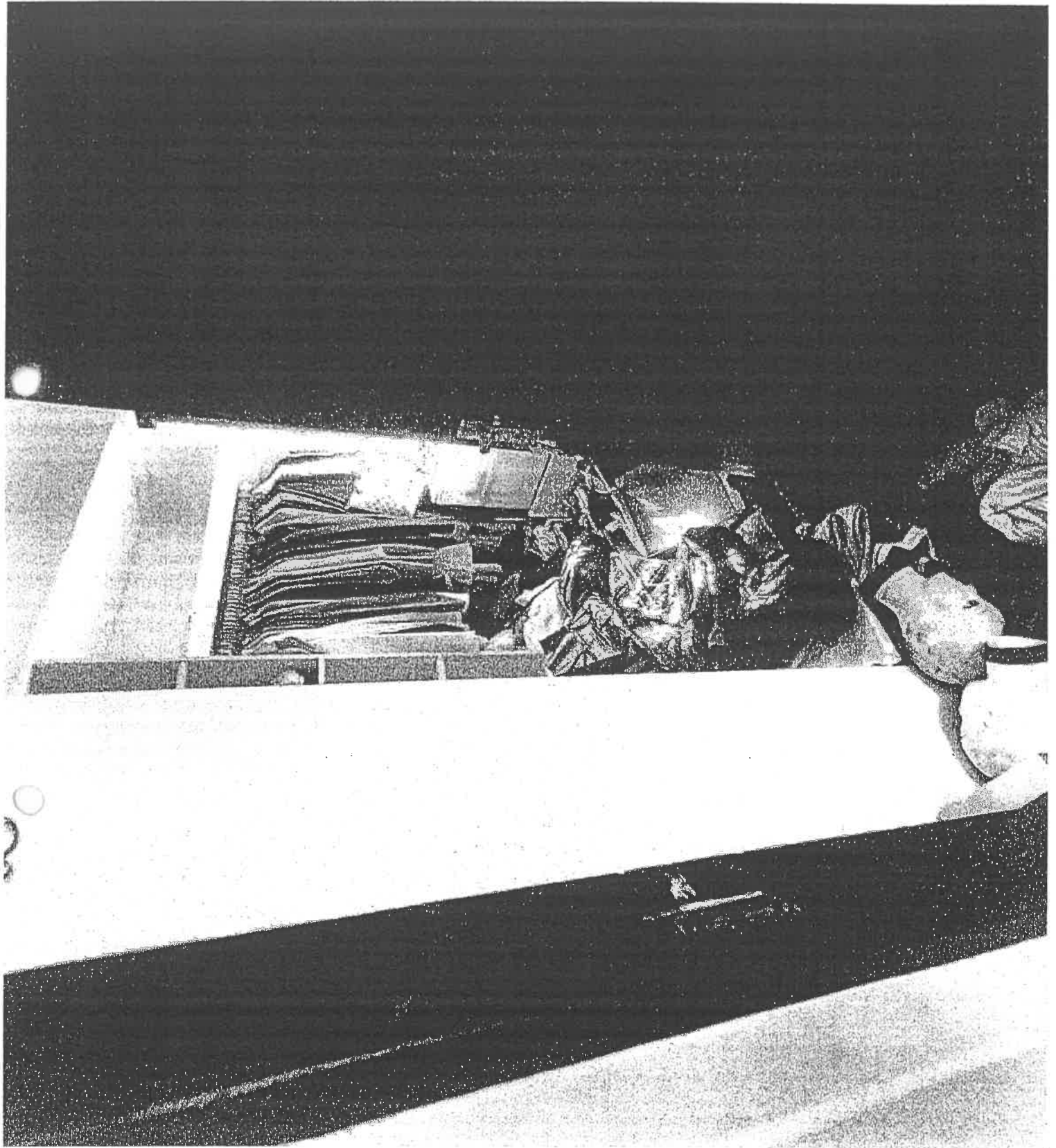




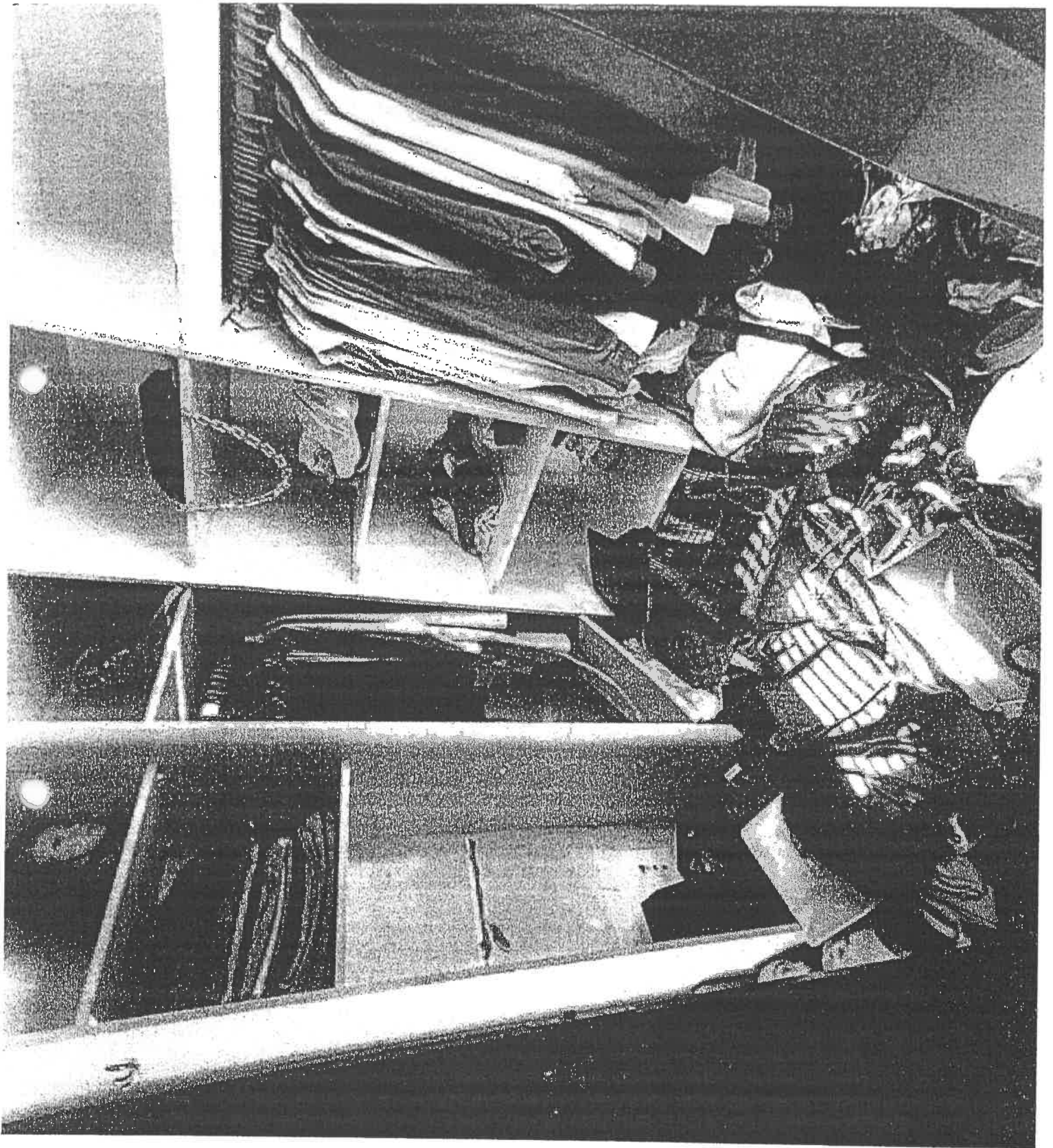












I, the undersigned,

SETEFANE PEREIRA DA COSTA BRITES

(Passport No.: CC594207)

do hereby make oath and say that:

1. I am an adult male of 58 years of age, not 47 years of age as stated erroneously in the affidavit deposed to by me on 9 December 2024 which affidavit was prepared by my previous legal representative, titled Sworn Affidavit in Support of Application for ~~Bail in terms of the Provisions of Section 60(11) of the Criminal Procedure Act, 51 of 1977 (as amended)~~" (hereinafter referred to as "***the main affidavit***"). Attached hereto as **Annexure "A"**. Unfortunately, I do not have the original affidavit but i confirm that this copy attached hereto accords with the original.
2. As is evident from copies of my passport I am permitted to be in South Africa by virtue of my spousal visa valid from 10/06/2024 to 10/06/2026 I only have photographs of the passport that were furnished to my legal representative . Attached hereto as **Annexure "B"**. My wife informs me that my Permanent Residence permit is ready for collection at home affairs. S.B. A.N
3. The facts contained herein are within my personal knowledge and belief both true and correct, save where I indicate otherwise or it is apparent from the context herein.
4. Submissions made are on the advise given to be by my legal representative which advice I accept as correct.

purpose of this affidavit

A.M

S.B

10. The first applicant / accused number one has already referred to the audio recording that we would like to have the Honourable court hear at the hearing of our bail application. I am not even mentioned in that audio, there is no inkling whatsoever therefrom as to what part I am alleged to have played in this whole ordeal (which I deny any part of in any event) and why I have even been arrested. The closest that I have come to know about what I am accused of is the notices referred to at Annexure SB1 to my main application. Thereafter I was informed in court on the 27 December 2024 and thereafter while consulting with my representative thereafter in the holding cells that the State wants to add a further charge that being robberies with aggravated circumstances.
11. From the outset I intend to plead not guilty to the charges. I intend to exercise my right to silence. I have not yet seen the police docket containing the evidence against me. I understand that is because procedurally I am not permitted to. However, I am entitled to a reasonable opportunity to adduce evidence as to why I should be released on bail. That has not happened. The first accused has set out in his affidavit the correspondence between our legal representative and the State. In essence that correspondence demonstrates that we have not been provided with sufficient particularity on what the charge and what my involvement in that crime is alleged to be so that I can meet the requirement for bail, which has been explained to me as that it must be in the interest of justice and that there must be exceptional circumstances as to why I should be released on bail.
12. In light of how we came to be incarcerated as detailed it's no wonder the State does not disclose further information. I respectfully submit that the state does not have a case against me and that I would be acquitted of the charges. In fact I will request my legal representative at the appropriate time apply for my discharge in terms of the

A.M

S.B

applicable provisions. I understand from the latest correspondence between my legal representative and the State that they allege I (as well as the other accused) are active participants in the alleged kidnapping of the victim and his continued unlawful captivity. However this simply can be because , not withstanding that I indent to plea not guilty, I have been incarcerated and remain incarcerated so I really don't understand who the State can sustain an allegation (with regard to the States letter dated the 14 January 2025) that I'm an active participant in the kidnaping. The correspondence to which I refer is already attached to the supplementary affidavit of the first applicant and not attached herein so as to avoid duplication and the papers becoming unduly burdened.

13. As far as I can remember I was at home on all relevant dates provided by the State in the allegations against me.
14. The exceptional circumstance comes down to this. The state has trampled on my rights I was arrested and detained at a "black site" and tortured.
15. In my main affidavit I made mention of the damage that was caused to my body pursuant to such torture, specifically that I had a crushed larynx as well as injury to the groin area. My legal representative has requested the hospital records from , and Westville Prison, as evidenced by Annexure "B" and which, at the time of this affidavit, has not yet been furnished with those records. I do, however, have a document titled "discharge summary" which indicates that I was admitted to GJGMRH Hospital on 22 November 2024 and discharged on 23 November 2024, with the medical diagnosis being mild crush to my larynx and urethral injury, with the final diagnosis being a mild crush injury.

A.M

C.B

S.B
A.M
I was taken to the clinic at Stoney on 21 November then transferred to hospital

16. This is all what I had at the moment as independent documentary evidence to substantiate my allegations, but it should be apparent when my legal representative receives the full medical record that what I say is the truth. It seems though the records at GJGMRH Hospital are *"tied up in bureaucracy"* in support hereof I refer to the acknowledgment of receipt we received from them. Attached hereto as **Annexure "C"**. At present we have not even received the curtesy of a reply from Westville Prison.
17. These injuries, as I indicated in my main affidavit, were pursuant to my arrest, I was subjected to force and sustained several physical injuries, including damage to my jaw and my private parts, because I could not urinate. When I went to the hospital, they put a catheter in and this is because it was only blood that was coming out of my system and, as far as I recall, I had four pints of blood to replace my lost blood. This was at Stanger, because when we went to the clinic from Stanger, they transferred me to the hospital. Despite my critical condition, I was denied medical treatment and for an extended period I was only transferred to GJGMRH Hospital after I persisted and pleaded with my captives.
18. The first applicant has already put forward to this court that we intend to lay complaints against the police with IPID, the Public Protector, the National Commissioner for Police; and the Human Rights Commission.

Why I should be granted bail

19. In addition to what I have stated in my main application.

A.M

S.B

20. I do not know the identity of any of the witnesses and as such I will not intimidate or threaten any of the States witnesses.
21. My release on bail will not endanger public safety.
22. I will not commit any offence while I'm on bail.
23. I will not undermine the proper functioning of the criminal justice system.
24. My release on bail will not disturb public order or undermine peace and security.
25. My release on bail will allow me to take see what damage was sustained to my residence and the rooms that I rent out pursuant to the police raid there. *Like college. S.B A.M*
26. I have been advised that the conditions of bail are within the discretion of the court, but my family has raised 5000 for payment of bail. *S.B A.M*
27. I confirm that I have had no previous convictions, there are no pending charges against (including anything relating to harassment and domestic violence) and I confirm that I am not out on bail in respect of any other matter.

WHEREFORE I humbly request this Honourable Court to admit me to bail subject to the terms, conditions and amount that this Honourable Court in the exercise of judicious discretion, deems appropriate as exceptional circumstances exist that in the interests of justice warrant my release on bail.

Setefane Pereira da Costa
ESMAEL MAULIDE RAMOS NANGY *Writer*

I HEREBY CERTIFY THAT THE DEPONENT HAS ACKNOWLEDGED:

A M

S.B

- (a) he knows and understands the contents of this affidavit;
- (b) he has no objection to taking an oath;
- (c) he considers the oath to be binding on his conscience.

THUS, signed and sworn before me, at Westville Prison on this the 21 day of **JANUARY 2025**, the Regulations contained in Government Notice No. R1648 of 19 August 1977 (as amended) having been fully complied with.

Zulu A.M.

COMMISSIONER OF OATHS

FULL NAMES: Zulu Alson Muaiwanele

BUSINESS ADDRESS: No. 01 Harro Gwala Rd

DESIGNATION: COG III

AREA / OFFICE: Westville Durban

28.

| |
|--|
| <p>INVESTIGATION:</p> <p>DURBAN REMAND DETENTION FACILITY</p> <p>21-01-2025</p> <p>PRIVATE BAG X1, DURBAN, WESTVILLE, 3630</p> <p>CORRECTIONAL SERVICES</p> |
|--|

SETEFANE PEREIRA DA COSTA BRITES

I HEREBY CERTIFY THAT THE DEPONENT HAS ACKNOWLEDGED:

- (d) he knows and understands the contents of this affidavit;
- (e) he has no objection to taking an oath;
- (f) he considers the oath to be binding on his conscience.

A.M

S.B

IN THE MAGISTRATE'S COURT FOR THE DISTRICT OF ILEMBE
HELD AT KWADUKUZA

CASE NO:

In the matter between:

THE STATE

VERSUS

ESMAEL MAULIDE RAMOS NANGY

1st APPLICANT

STEFANE PEREIRA DA COSTA BRITES

2ND APPLICANT

SWORN AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR BAIL, IN TERMS OF
THE PROVISIONS OF SECTION 60 (11) OF THE CRIMINAL PROCEDURE ACT 51
OF 1977, AS AMENDED

I the undersigned,

STEFANE PEREIRA DA COSTA BRITES
(PASSPORT NO: CC594207)

do hereby make oath and say that:

1. I hereby confirm the affidavit composed by ESMAEL MAULIDE RAMOS NANGY insofar as it relates to me and wish to extend thereon with what I set out herein below.

PERSONAL DETAILS

- 1.1 am an adult male, 47 years of age, holding a Mozambican passport (Passport No: CC594207).

A.M

SB
NSP

S.B

2. I reside in Primrose, Johannesburg, where I have lived with my wife and children for many years. I have attached a copy of my title deed here to marked "SB0"

3. I am married to Selma Pereira Da Costa Brites.

PURPOSE OF APPLICATION

4. This application is made to secure my release on bail pending the finalization of the charges against me. I aim to demonstrate to this Honourable Court that my continued detention is neither in the interests of justice nor warranted under the circumstances, given the exceptional violations of my constitutional rights and my commitment to stand trial.

5. The purpose of this affidavit is to provide the court with sufficient information regarding my personal circumstances, the conditions of my arrest and detention, and the reasons why my release on bail is justifiable and appropriate.

EMPLOYMENT AND FINANCIAL CIRCUMSTANCES

6. I am retired and no longer formally employed. My wife and children depend on me for their financial and emotional well-being.

CHARGES AND ALLEGATIONS

7. I have been informed that I am to be charged with offenses related to alleged kidnapping.

A.M

S.B
100m

S.B

8. I intend to plead NOT GUILTY to all charges, as I maintain that I have no involvement in the alleged crimes.

9. I fully intend to stand trial to clear my name.

CIRCUMSTANCES OF ARREST

10. On 19 November 2024, I was arrested alongside my brother-in-law, Esmael Maulide Ramos Nangy, by individuals identifying themselves as members of the South African Police Service (SAPS) and private security personnel.

11. During the arrest, I was subjected to undue force and inhumane treatment, resulting in severe physical injuries, including damage to my jaw, larynx, and urethra.

12. Despite my critical condition, I was denied medical treatment for an extended period. I was only transferred to GJGMRH Hospital after persistent pleas and was kept handcuffed during my hospitalization.

13. The conditions of my arrest and detention are corroborated by the confirmatory affidavits of Selma Pereira Da Costa Brites, Naziah Nangy, and Jessica Ismaeel Nangy, attached hereto.

BAIL CONSIDERATIONS

EXCEPTIONAL CIRCUMSTANCES

14. I respectfully submit that the following exceptional circumstances justify my release on bail:

A.M

SB
NSDx

S.B

- 14.1. **Unlawful Arrest:** I was arrested under conditions that violated my constitutional rights. The individuals involved did not identify themselves properly as law enforcement officers, and no valid arrest warrant was presented.
- 14.2. **Torture and Assault:** During my detention, I was subjected to severe physical assaults and inhumane treatment. These incidents are corroborated by the confirmatory affidavits of Selma Pereira Da Costa Brites, Naziah Nangy, and Jessica Ismaeel Nangy.
- 14.3. **Unlawful Detention:** I was held for over 48 hours without being informed of my rights, allowed access to legal counsel, or provided medical treatment. My detention during this period was unconstitutional and in direct violation of the Criminal Procedure Act.
- 14.4. **Impact on Family:** The unlawful actions against me have caused significant distress to my wife and children, who have been left without their primary provider. The detailed account of these impacts is outlined in the confirmatory affidavit of Selma Pereira Da Costa Brites, attached hereto.
- 14.5. **Violation of Due Process:** Despite being arrested on 19 November 2024, I was only presented before a court four days later, contrary to the legal requirement to be brought to court within 48 hours. A copy of our Certificate of rights is annexed hereto and marked annexure "SB1".
- 14.6. I submit that these circumstances highlight egregious violations of my constitutional rights and warrant the court's serious consideration in granting bail.

Section 60(4) of the Criminal Procedure Act (CPA):

15. I submit that there is no likelihood that my release on bail will:

- 15.1. Endanger the safety of the public or any person;
- 15.2. Pose a flight risk;
- 15.3. Result in interference with the State's witnesses or evidence.

SB

NSP

A.M

S.B

Family and Community Ties:

16. I have deep-rooted family and community ties in South Africa, as evidenced by my long-standing residence and employment. My wife and children depend on me for their financial and emotional well-being.

No Prior Convictions or Pending Cases:

17. I have no prior criminal convictions or pending cases against me, either in South Africa or Mozambique. I further submit that I have no Domestic Violence nor Harassment orders filed against me.

Commitment to Stand Trial:

18. I am committed to attending all court appearances and cooperating fully with the judicial process. My travel documents, including my passport, will be surrendered to the court or investigating officer to alleviate any concerns of flight risk.

CONDITIONS OF RELEASE

- 19.1. I am willing to comply with any reasonable bail conditions imposed by this Honourable Court, including but not limited to:
- 19.2. Reporting to a designated police station at regular intervals;
- 19.3. Restricting my movements within a specified geographic area;
- 19.4. Abstaining from any contact with State witnesses.
- 19.5. I am also prepared to provide a monetary assurance as determined by the court to secure my release on bail.

RELIEF REQUESTED

20. I respectfully request this Honourable Court to grant bail in the interests of justice, considering my personal circumstances, commitment to the trial, and the absence of any risk factors associated with my release.

SB
NSPX

A.M

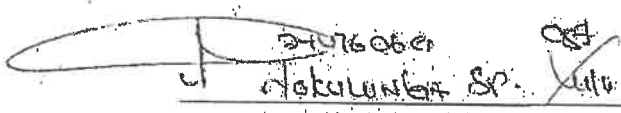
S.B

CONFIRMATORY AFFIDAVITS AND ANNEXURES

- 21.1. I rely on and incorporate by reference the following confirmatory affidavits, which provide crucial support and corroboration for my application:
- 21.2. **Confirmatory Affidavit of Selma Pereira Da Costa Brites:** Supporting the account of my arrest and detention, the raid on her residence, and the violations of her and her husband's rights.
- 21.3. **Confirmatory Affidavit of Naziah Nangy:** Detailing the threats, harassment, and unlawful actions she experienced during and after my arrest, as well as the illegal raid and theft at our family home.
- 21.4. **Confirmatory Affidavit of Jessica Ismaeel Nangy:** Providing evidence of the unlawful raid on her property, the emotional distress caused to her and her family, and her corroboration of the details regarding my arrest and torture.


DEPONENT

SIGNED AND SWORN TO BEFORE ME AT KWAJALUZA ON THIS 09 DAY OF DECEMBER 2024, THE DEPONENT HAVING ACKNOWLEDGED IN MY PRESENCE THAT HE KNOWS AND UNDERSTANDS THE CONTENTS OF THIS AFFIDAVIT, THE PROVISIONS OF GOVERNMENT GAZETTE R1478 OF 11 JULY 1980 AS AMENDED BY GOVERNMENT GAZETTE R774 OF 20 APRIL 1982, CONCERNING THE TAKING OF THE OATH, HAVING BEEN COMPLIED WITH.


COMMISSIONER OF OATHS

CAPACITY: CST

Nokulunga Siphe Precious Xulu

A.M

S.B

FULL NAMES: Nokulunga Sipho P. M.
PHYSICAL ADDRESS: KwaDukuza
MAGISTRATE COURT
KwaDukuza
4450

S.B.
nsa

A.M

S.B

S 20

VELLE TINTO &
ASSOCIATES INC
Prokureur/Attorney

623

TEL: 012-607 3368

DEED OF TRANSFER

In favour of

BETERANE PEREIRA DA COSTA BRITES and
SELMA PEREIRA DA COSTA BRITES

over

ERF 1762 PRIMROSE TOWNSHIP

VELLE TINTO & ASSOCIATES INC
P.O. BOX 733
WAPADRAND
0080
Tel: 012-607 3368

GhasiConvey 13.9.5.8

S.B.

NBDx

A.M

S.B

Page 2

AND the Appearer declared that her said principal the Trustees in the Insolvent Estate of GIDEON JOHANNES WAIT, Number G 676/2016, and Trustees in the Insolvent Estate of COLLEEN EILEEN VAN ROOYEN-WAIT, Number G 677/2015, had truly and legally sold on 16 January 2017 and that she, the said Appearer, in her capacity aforesaid, did by these presents, cede and transfer to and on behalf of

SETEFANE PEREIRA DA COSTA BRITES

Born on 19 December 1969 and

SELMA PEREIRA DA COSTA BRITES

Identity Number 7707250246082

Married in community of property to each other

their Heirs, Executors, Administrators or Assigns, in full and free property

ERF 1762 PRIMROSE TOWNSHIP

REGISTRATION DIVISION I.R. THE PROVINCE OF GAUTENG

MEASURING 991 (NINE HUNDRED AND NINETY ONE)

SQUARE METRES

HELD BY DEED OF TRANSFER T 35712/2004

SUBJECT to such conditions as are mentioned or referred to in the aforesaid Deed/s.

WHEREFORE/...

S.B.

NSC

Ghosi Convey 12.9.2017

A.M

S.B

Page 3

WHEREFORE the Appearer, renouncing all rights and title which the said

1. Trustees in the Insolvent Estate of
GIDEON JOHANNES WAIT
Number G 876/2015
2. Trustees in the Insolvent Estate of
COLLEEN EILEEN VAN ROOYEN-WAIT
Number G 877/2015

heretofore had to the premises, did in consequence also acknowledge them to be entirely dispossessed of and disentitled to the same, and that by virtue of these presents, the said

SETEFANE PEREIRA DA COSTA BRITES and
SELMA PEREIRA DA COSTA BRITES

their Heirs, Executors, Administrators or Assigns, now are and henceforth shall be entitled thereto, conformably to local custom, the State, however, reserving its rights, and finally acknowledging the purchase price to be the sum of R450 000,00 (FOUR HUNDRED AND FIFTY THOUSAND RAND).

IN WITNESS WHEREOF, I the said Registrar, together with the Appearer, q.q. have subscribed to these presents and have caused the Seal of Office to be affixed thereto.

THUS DONE AND EXECUTED at the Office of the REGISTRAR OF DEEDS at JOHANNESBURG on

2017-03-08

In my presence

REGISTRAR OF DEEDS

GhosiConvey 15.9.5.4

A.M

SB

623

VELILE TINTO & ASSOCIATES INC,
P.O. BOX 733
WAPADRAND
0050

| | |
|------------|----------|
| Fees/Foole | R 359,00 |
| Exempted | Cal |
| Vrygestel | Kal |

Prepared by me

CONVEYANCER
MADELYN KRUGER

DEED OF TRANSFER

T 000007094 / 2017

BE IT HEREBY MADE KNOWN THAT

ELMARIE BORMAN

mar Borm

appeared before me, REGISTRAR OF DEEDS at JOHANNESBURG, she the said
Apparater, being duly authorised thereto by Powers of Attorney signed
at PRETORIA on 6 FEBRUARY 2017, at PRETORIA on 17 FEBRUARY 2017 and
at PRETORIA on 3 FEBRUARY 2017, granted to her by

1. The Trustees in the Insolvent Estate of
GIDEON JOHANNES WAIT
Identity Number 631121 5031 08 4
Married out of community of property
Number G 676/2015
2. The Trustees in the Insolvent Estate of
COLLEEN EILEEN VAN ROOYEN-WAIT
Identity Number 641014 0106 08 4
Married out of community of property
Number G 677/2015

AND

GlossConvey 15.9.5.6

A.M

SB

You are being detained for the following reason:

SB1

1. KIDNAPPING

2. ARREST

As a person who is detained, you have the following rights:

- (a) you have the right to consult with a legal practitioner of your choice or, should you so prefer, to apply to the Legal Aid Board to be provided by the State with the services of a legal practitioner;
- (b) you have the right to challenge the lawfulness of your detention in person before a court of law and to be released if such detention is unlawful;
- (c) you have the right to be detained under conditions consonant with human dignity, which shall include at least the provision of adequate accommodation, sanitation, clothing, medical treatment at State expense; and
- (d) you have the right to be given the opportunity to communicate with, and be visited by, your spouse or partner, next-of-kin, religious counsellor and a medical practitioner of your choice.

As a person arrested for the alleged commission of an offence, you have the following rights:

- (a) You have the right to remain silent and anything you say may be recorded and in of by used in evidence against you;
- (b) you are not compelled to make a confession or admission which could be used in evidence against you;
- (c) you have the right to be brought before a court as soon as reasonably possible, but not later than 48 hours after your arrest or the end of the first court day after the expiry of the 48 hours, if the 48 hours expire outside ordinary court hours or on a day which is not an ordinary court day;
- (d) you have the right, at the first court appearance after your arrest, to be informed of the reason for your continued detention, or to be released; and
- (e) you have the right to be released from detention if the interests of justice permit, subject to reasonable conditions.

You can exercise all the abovementioned rights at any stage during your detention.

CERTIFICATE BY DETAINEE

STEFANE PEREIRA DA COSTA BATES

(name of detainee) hereby certify that I have been

informed in ENGLISH

(State language) of my rights in terms of the Constitution as set out above by

CS 7-SINGH

(name of Person who informed the detainee) and that I understand the contents

thereof.

DATE: 2024/11/22

TIME: 10H15
(Informed)

PLACE: Kwa Dukuza
(Informed)

SIGNATURE/THUMBPRINT OF DETAINEE

SIGNATURE OF PERSON WHO INFORMED THE DETAINEE

CERTIFICATE BY THIRD PERSON AS WITNESS (if required)

(name of person) hereby certify

(name of detainee) has been informed in my presence

(State language) of his/her rights in terms of the Constitution as set out above by

(name of person who informed the detainee) and

the contents thereof has been explained to him/her but that he/she refuses to sign the above certificate.

DATE:
(Informed)

TIME:
(Informed)

PLACE:
(Informed)

SIGNATURE OF THIRD PERSON

SB
NXP

SB

IN THE HIGH COURT OF SOUTH AFRICA
KWA-ZULU NATAL LOCAL DIVISION, DURBAN

CASE NO:

In the matter between:

ESMAEL MAULIDE RAMOS NANGY

1ST APPLICANT

STEFANE PEREIRADA COSTA BRITES

2ND APPLICANT

And

THE STATE - C/O THE DIRECTOR OF
PUBLIC PROSECUTIONS, DURBAN -

1ST RESPONDENT

THE DEPARTMENT OF CORRECTIONAL SERVICES
- WESTVILLE

2ND RESPONDENT

THE MINISTER OF POLICE

3RD RESPONDENT

CONFIRMATORY AFFIDAVIT

I, the undersigned,

SELMA PEREIRA DA COSTA BRITES
(ID NO: 770725 0246 08 2)

do hereby make oath and state that


S.B
NSD

A.M

S.B

- 2 -

1. I am an adult female of full legal capacity and the wife of the Second Applicant.
2. The facts herein contained are within my personal knowledge and unless stated to the contrary, they are both true and correct.
3. I have read the Affidavit and Supporting Affidavit of the 1st and 2nd applicant respectively and confirm the contents thereof insofar as they relate and/or refer to me.
4. Further thereto, this affidavit is made to support the affidavit of my husband, **STEFANE PEREIRA DA COSTA BRITES**, and to provide my account of the events that transpired on and after **19 November 2024**, involving his arrest, the extortion attempt, and the violations of our rights by members of the South African Police Service (SAPS).
5. On **19 November 2024**, I received a phone call from my husband at **10:08 PM** informing me that he and his brother had been arrested by members of the SAPS.
6. During the call, my husband stated that they were being tortured and assaulted by the police officers. He sounded distressed and in pain, and I was unable to ascertain the full extent of his injuries.
7. My husband informed me in addition to this that the torture commenced on Tuesday and continued unabated up until Wednesday the 20th of

S B
Nsepo

A.M

S.B

- 3 -

November 2024. Further thereto my husband was blindfolded and also corroborates the same treatment that had occurred to the first applicant as set out in the first applicants affidavit.

8. On 20 November 2024, my niece informed me that members of the SAPS had raided hers and my brothers-in-law residence at Midstream Estate.
9. According to my niece during the raid, the officers caused significant property damage while allegedly searching for evidence related to the alleged offence. Furniture was overturned, and several items were broken or removed without explanation. The individuals present at the raid arrived in a variety of vehicles, including Golf 8s, Golf 7s, and several 4x4s. Among the vehicles at the raid was a Hyundai H1, an unmarked vehicle without police license plates, which we believe was used to transport my husband and brother-in-law to KZN.
10. Despite repeated requests by our attorneys and family, the estate management refused to release CCTV footage of the raid, leaving us without critical evidence to corroborate the incident.
11. On 21 November 2024, I received a phone call at 8:58 AM from the number 083 261 4315. The caller was a male who did not identify himself.

S.B.
N.B.

A.M

S.B

- 4 -

12. The caller began the conversation by saying: "I kidnapped your husband, and the ransom is 10 billion dollars, and I need the money now."
13. When I explained that I did not have such an amount and that I was a housewife, the caller responded: "I am joking. We have your husband; he was arrested, and we are now taking him to KZN."
14. Upon investigating the phone number using Truecaller, I discovered that it was registered to **Mohammed Inhiath Raoof**, a Captain in the SAPS. When I asked if I could provide our lawyer with this number, the caller refused, stating that he was merely informing me of the arrest as a favor.
15. Neither my husband nor his brother were permitted visitation, access to legal counsel, or any of their constitutional rights available to arrested or detained persons.
16. I attempted to check on my husband's condition at the detention facility but was denied access by the officers present.
17. I confirm that the above statement was done freely and voluntarily without any force or duress, and I have no objection in taking the prescribed oath herein.

B. J. Les

DEPONENT

SB
NSPX

A.M

SB

- 5 -

SIGNED AND SWORN TO BEFORE ME AT Brakpan ON THIS THE
30th DAY OF November 2024, THE DEPONENT HAVING
 ACKNOWLEDGED IN MY PRESENCE THAT HE KNOWS AND UNDERSTANDS
 THE CONTENTS OF THIS AFFIDAVIT, THE PROVISIONS OF GOVERNMENT
 GAZETTE R1478 OF 11 JULY 1980 AS AMENDED BY GOVERNMENT
 GAZETTE R774 OF 20 APRIL 1982, CONCERNING THE TAKING OF THE
 OATH, HAVING BEEN COMPLIED WITH.



 COMMISSIONER OF OATHS
CAPACITY: DirectorFULL NAMES: Surita Ford

PHYSICAL ADDRESS: _____

COMMISSIONER OF OATHS (RSA)

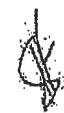
Surita Ford

Ref no: RO-19/07/2020

Shop 48, Mall@Carnival

Chr Alroff & Heidelberg Road

Dalpark Ext 5, Brakpan



 S.B.
 NSOX

A.M

S.B

- 2 -

3. I have read the Affidavit and Supporting Affidavit of the 1st and 2nd applicant respectively and confirm the contents thereof insofar as they relate and/or refer to me.
4. Further thereto, I record as follows:
5. On or about 19 November 2024 at approximately 15h30 I received a phone call from a number unknown to me and described as 060 etc etc.
6. I answered the phone call and could hear a commotion in the background which sounded as though certain individuals were arguing or fighting.
7. I could not make out coherently what the voices were saying but I heard my husband shout out to me on the phone and said Nazliya Rashid.
8. The call lasted approximately fifteen seconds and then the call was disconnected.
9. Approximately one hour after the first call and at 16h30 I received another call from the same number as recorded above.
10. The voice on the other side which sounded to me like an Indian accent told me the following : Listen here if you don't release the victim Zakariyya, I should tell Dornbe that they will cut my husband into pieces and throw him in the bush.
11. I was not even able to respond before the call was disconnected.
12. Approximately 15 - 20 minutes after the second call, I then contacted the number and began recording the calls. The threats continued as can be heard from the recording which has been transcribed and attached hereto marked RN1.
13. I further submit that the recording will be presented on a memory stick for the benefit of the court which can be played at the hearing of this matter.

A.M

SB
NBR
NN
S.B

- 3 -

14. The calls were chilling and frightening and I wholly believe that they did inflict harm my husband and brother-in-law.
15. The total calls between myself and the number were easily in excess of 15 calls and the recordings presented to this Honourable Court reflects the series of phone calls which took place between 15h30 on Tuesday the 19th of November 2024 until around 10h00 on Wednesday the 20th of November 2024. The phone calls continued well into the early hours of the morning and my husband was forced to speak to me telephonically and I was forced to hear them torture my husband while he begged and pleaded for them to stop and pleaded for me to give them any information relating to my brother.
16. Neither myself nor my husband nor brother have any information related to the allegations of kidnapping of any individuals by the name of Zakariyya, who is unknown to me or any kidnapping whatsoever.
17. In addition thereto, I was asked by the police officers who were torturing my husband to provide them with the cell phone number of my brother named Joninho, and that I was to inform him to release this person named Zakariyya. I repeatedly expressed grave concern at this and told them that I was not aware of any kidnapping, nor any person named Zakariyya, and that I have made numerous attempts to call my brother but to no avail. I then forwarded the number to the police officers in fear that they would continue harming and possibly kill my husband as they have threatened.
18. The inhumane treatment and punishment continued as stated above until Wednesday the 20th of November 2024 where I was forced to listen, and in one of the phone calls on the same day, my husband contacted me again from his WhatsApp number with the police officers listening again closely and begged again to provide any information relating to my brother to the police officers. I once again state that neither myself nor my husband have any knowledge relating to any kidnapping relating to any persons and moreover it is telling that the allegations are not even allegations made against my husband but against my brother whose whereabouts are unknown to me.

A.M

SB
14/8/24 MN

S.B

- 5 -

24. I pause to mention that during the entire ordeal my 12-year-old son was forced to watch them and forced to watch them assault my domestic helper when she demanded that they identify themselves to her.
25. I can confirm that the evidence of this raid is in fact contained in the video footage held by the estate's security and confirmed by the necessary security on duty who failed to identify themselves and which estate security has refused to provide the documentary evidence to us.
26. I submit that all of this evidence may easily be obtained by a simple request from by a simple request from the SAPS.
27. I submit that the exact same treatment and incident occurred at my Husband's daughters' home which is situated at number 24 midlands in midstream. I confirm that she informed me that she only became aware of this upon arriving home to find that the power has been disconnected from the property and that the property had been ransacked. The front door had been forced open as can be seen from the various pictures and video footage.
28. Again, I submit that the security on duty can attest to what had transpired and moreover can confirm of the individuals who raided our home were in fact police officers acting without any authority and unlawfully. Following the raid and phone calls on Wednesday I immediately contacted my attorney of record and immediately explained the situation to him and he convinced both myself as well as Jessica to open charges of kidnapping and theft, housebreaking and extortion and we have done so.
29. I submit that on the same day that I found out I attended at the Olifantsfontein police station to report charges of kidnapping and theft, housebreaking and extortion, however the charge offices in Olifantsfontein refused to open the case of kidnapping and said I have to wait 48hrs before opening a case of kidnapping. At approximately 11pm on Thursday 21st November 2024 accompanied by my attorney who, after engaging extensively with the charge office obtained the case number for the above complaints attached as follows- CAS208/11/2024. CAS 209/11/2024.

A.M

S.B
N/A
N/A

S.B

- 6 -

30. I had no contact from any investigating officer in respect to these case numbers. And my husband and Jessica's father (husbands' brother-in-law) remain detained unlawfully and remain subjected to inhumane torture treatment without any hope of it coming to an end.
31. I can confirm that I have been informed by Jessica as well as the first applicants' wife, that the applicants have been continuously tormented, tortured and subjected to painful unending and inhumane treatment.
32. I submit that after I opened the case on Thursday the 21st of November 2024, I became petrified as it then became known to me that the police officers now intended to do harm to myself and my children. Accordingly I turned my phone off and went into hiding until I was notified by my sister-in-law that she had spoken to my husband and that they were in fact in KwaDukuza and were scheduled to make a first appearance on Friday.
33. I, at the time, was unaware of what had transpired but was being informed that their formal bail application had been postponed to the 9th of December 2024.
34. I reiterate that under no circumstances can my husband endure even another minute of the inhumane torture and punishment and his brother in law, the second applicant, have been receiving and accordingly I have been advised by attorney of record that even one minute of unlawful detention is urgent in nature and this honourable court will view it as urgent and require its immediate and permanent and which may lead the first and second applicants immediate release from the unlawful detention.

Nancy KAR Nangy
DEPONENT

A.M

SB
NBR

S.B

-7-

SIGNED AND SWORN TO BEFORE ME AT Centurion ON THIS THE
03 DAY OF NOVEMBER 2024, THE DEPONENT HAVING ACKNOWLEDGED
 IN MY PRESENCE THAT HE KNOWS AND UNDERSTANDS THE CONTENTS
 OF THIS AFFIDAVIT, THE PROVISIONS OF GOVERNMENT GAZETTE R1478
 OF 11 JULY 1980 AS AMENDED BY GOVERNMENT GAZETTE R774 OF 20
 APRIL 1982, CONCERNING THE TAKING OF THE OATH, HAVING BEEN
 COMPLIED WITH.

 COMMISSIONER OF OATHS

Magdeline Makhubela

Reference No: KM201/10

2123 Hendrik Verwoerd Drive,

Hennapspark, 0157

Tel No: (012) 659-7880/1

 COMMISSIONER OF OATHS

CAPACITY: Commissioner

FULL NAMES: Magdeline Makhubela

PHYSICAL ADDRESS: 2123 Hendrik Verwoerd

Hennapspark

Centurion 0157

A.M

SB
 NSAK

S.B

- 2 -

1. I am an adult female of full legal capacity and the daughter of the First Applicant.
2. The facts herein contained are within my personal knowledge and unless stated to the contrary, they are both true and correct.
3. I have read the Affidavit and Supporting Affidavit of the 1st and 2nd applicant respectively and confirm the contents thereof insofar as they relate and/or refer to me.
4. Further thereto, this affidavit is made to provide my account of the events that transpired during the raid at our residence on 20 November 2024, and to support the affidavits of my father and uncle regarding the conduct of the South African Police Service (SAPS).
5. My father was arrested by members of the SAPS on 19 November 2024 between Kraft Road and the Edenvale off-ramp. He informed me that he was severely assaulted and tortured whilst in police custody.
6. My father called my mother at approximately 10:08 PM on the night of his arrest, describing the assaults and torture he was enduring at the hands of the police.
7. Despite his deteriorating condition and difficulty breathing due to the assaults, my father was not afforded medical attention, unlike my uncle, who was also assaulted but transported to the hospital only after medical staff insisted.

SB

JN
NSX

A.M

SB

- 3 -

8. On 21 November 2024, my aunt, Selma Pereira Da Costa, received a call at 8:58 AM from the number 083 261 4315.

Formatted: Indent: Left: 0.5 cm, Right: 1.25 cm

9. The caller, who did not identify himself initially, stated the following: "I kidnapped your husband and the ransom is 10 billion dollars, and I need the money now." When my aunt explained that she did not have such money and was a housewife, the caller responded: "I am joking. We have your husband; he was arrested and we are now taking him to KZN."

Formatted: Indent: Left: 0.25 cm

10. Using a telephone identification application, Truecaller, the number was identified as belonging to one Mohammed Iniaty Radof, a Captain in the SAPS.

11. On the 20th of November 2024 upon arriving at home at approximately 8:00pm I noticed that my front door had been forced open and that the power had been cut from my house. I entered the property and noticed that my house had been ~~raided~~ sacked and ~~ransacked~~ ransacked, and various cupboards and furniture had been broken.

12. In addition thereto, a certain amount of money, approximately R35 000 (Thirty-Five Thousand Rands), that was in my bedside drawer had been stolen. I immediately contacted security, who confirmed that the police were conducting a raid and that it was a police operation in which they could not be involved. When I enquired with the security as to why they did not inform me of this, they responded that the police had instructed them not to contact anyone regarding the raid, as it was a police-sanctioned operation. The security also confirmed that helicopters

SB

JN 1/29/20

SB

A.M

- 4 -

had accompanied the police, who included both plain clothed and uniformed officers, as well as members of a private security company known as Vision Tactical. We were also informed by the security about the vehicles present on the day, which included several Golf 7s, Golf 8s, a Hyundai H1, multiple 4x4s, and Rangers.

13. Following the raid, I immediately informed my aunt, **SELMA PEREIRA DA COSTA BRITES** about the incident. I described the extensive damage caused to our property and the intimidating conduct of the officers.
14. After the raid, I approached the estate management to request access to the CCTV footage of the incident to share with our attorneys. However, my request was denied, and no reasons were provided for their refusal to release the footage.
15. The raid caused significant emotional distress to me and our family. The aggressive manner in which the officers conducted themselves left me feeling unsafe and violated within my own home.
16. The damage to our property has also placed a financial burden on our family, as many of the damaged items are essential to our daily lives.
17. I have been particularly distressed by the treatment of my father during his arrest and detention, as well as the lack of communication and transparency from the authorities regarding his well-being.

S.B.

Jn

NSP

A.M

S.B.

- 5 -

18. I confirm that the above statement was done freely and voluntarily without any force or duress, and I have no objection in taking the prescribed oath herein.

Jessica Nancy
DEPONENT

SIGNED AND SWORN TO BEFORE ME AT Brakpan ON THIS THE 30th DAY OF November 2024, THE DEPONENT HAVING ACKNOWLEDGED IN MY PRESENCE THAT HE KNOWS AND UNDERSTANDS THE CONTENTS OF THIS AFFIDAVIT, THE PROVISIONS OF GOVERNMENT GAZETTE R1478 OF 11 JULY 1980 AS AMENDED BY GOVERNMENT GAZETTE R774 OF 20 APRIL 1982, CONCERNING THE TAKING OF THE OATH, HAVING BEEN COMPLIED WITH.

[Signature]
COMMISSIONER OF OATHS

CAPACITY: Director

FULL NAMES: Surita Ford

PHYSICAL ADDRESS:

[Signature]
COMMISSIONER OF OATHS (RSA)

Surita Ford

Ref no: RO-18/07/2020
Shop 4B, Mall @ Carnival
Cnr Airport & Heidelberg Road
Dalpark Ext 5, Brakpan

SB

Jn ASB

A.M

S.B

Tipo tipo
PC

Código do País: **000**
PRT

CC594207

1. Apellido(s) *Suriname* *Nam*

PEREIRA DA COSTA BRITES

SETEFANE

3. Nacionalidade Nacionalidade Nacionalidade

PORTUGUESA

1.78

5. Data de nascimento do(a) do(a) birth Date de naissance de

18.12.1966

6. No additional funds provided for 2007-2008
12957879

T. E. Corp. & Son

5. Local de nascimento: *Place of birth* (how do you know?)

ed
TV

MOÇAMBIQUE

04. Dated 4th July 2019 Date of issue: Dec'd de ceterantio

10. Autoridades Authority Authorities

20.05.2022

JOANESBURGO (ÁFRICA DO SUL)

| Sl. No. | Particulars | Amount | Date of expiry | Date of withdrawal |
|---------|-------------|--------|----------------|--------------------|
| 1 | ... | ... | ... | ... |
| 2 | ... | ... | ... | ... |
| 3 | ... | ... | ... | ... |
| 4 | ... | ... | ... | ... |
| 5 | ... | ... | ... | ... |
| 6 | ... | ... | ... | ... |
| 7 | ... | ... | ... | ... |
| 8 | ... | ... | ... | ... |
| 9 | ... | ... | ... | ... |
| 10 | ... | ... | ... | ... |
| 11 | ... | ... | ... | ... |
| 12 | ... | ... | ... | ... |
| 13 | ... | ... | ... | ... |
| 14 | ... | ... | ... | ... |
| 15 | ... | ... | ... | ... |
| 16 | ... | ... | ... | ... |
| 17 | ... | ... | ... | ... |
| 18 | ... | ... | ... | ... |
| 19 | ... | ... | ... | ... |
| 20 | ... | ... | ... | ... |
| 21 | ... | ... | ... | ... |
| 22 | ... | ... | ... | ... |
| 23 | ... | ... | ... | ... |
| 24 | ... | ... | ... | ... |
| 25 | ... | ... | ... | ... |
| 26 | ... | ... | ... | ... |
| 27 | ... | ... | ... | ... |
| 28 | ... | ... | ... | ... |
| 29 | ... | ... | ... | ... |
| 30 | ... | ... | ... | ... |
| 31 | ... | ... | ... | ... |
| 32 | ... | ... | ... | ... |
| 33 | ... | ... | ... | ... |
| 34 | ... | ... | ... | ... |
| 35 | ... | ... | ... | ... |
| 36 | ... | ... | ... | ... |
| 37 | ... | ... | ... | ... |
| 38 | ... | ... | ... | ... |
| 39 | ... | ... | ... | ... |
| 40 | ... | ... | ... | ... |
| 41 | ... | ... | ... | ... |
| 42 | ... | ... | ... | ... |
| 43 | ... | ... | ... | ... |
| 44 | ... | ... | ... | ... |
| 45 | ... | ... | ... | ... |
| 46 | ... | ... | ... | ... |
| 47 | ... | ... | ... | ... |
| 48 | ... | ... | ... | ... |
| 49 | ... | ... | ... | ... |
| 50 | ... | ... | ... | ... |
| 51 | ... | ... | ... | ... |
| 52 | ... | ... | ... | ... |
| 53 | ... | ... | ... | ... |
| 54 | ... | ... | ... | ... |
| 55 | ... | ... | ... | ... |
| 56 | ... | ... | ... | ... |
| 57 | ... | ... | ... | ... |
| 58 | ... | ... | ... | ... |
| 59 | ... | ... | ... | ... |
| 60 | ... | ... | ... | ... |
| 61 | ... | ... | ... | ... |
| 62 | ... | ... | ... | ... |
| 63 | ... | ... | ... | ... |
| 64 | ... | ... | ... | ... |
| 65 | ... | ... | ... | ... |
| 66 | ... | ... | ... | ... |
| 67 | ... | ... | ... | ... |
| 68 | ... | ... | ... | ... |
| 69 | ... | ... | ... | ... |
| 70 | ... | ... | ... | ... |
| 71 | ... | ... | ... | ... |
| 72 | ... | ... | ... | ... |
| 73 | ... | ... | ... | ... |
| 74 | ... | ... | ... | ... |
| 75 | ... | ... | ... | ... |
| 76 | ... | ... | ... | ... |
| 77 | ... | ... | ... | ... |
| 78 | ... | ... | ... | ... |
| 79 | ... | ... | ... | ... |
| 80 | ... | ... | ... | ... |
| 81 | ... | ... | ... | ... |
| 82 | ... | ... | ... | ... |
| 83 | ... | ... | ... | ... |
| 84 | ... | ... | ... | ... |
| 85 | ... | ... | ... | ... |
| 86 | ... | ... | ... | ... |
| 87 | ... | ... | ... | ... |
| 88 | ... | ... | ... | ... |
| 89 | ... | ... | ... | ... |
| 90 | ... | ... | ... | ... |
| 91 | ... | ... | ... | ... |
| 92 | ... | ... | ... | ... |
| 93 | ... | ... | ... | ... |
| 94 | ... | ... | ... | ... |
| 95 | ... | ... | ... | ... |
| 96 | ... | ... | ... | ... |
| 97 | ... | ... | ... | ... |
| 98 | ... | ... | ... | ... |
| 99 | ... | ... | ... | ... |
| 100 | ... | ... | ... | ... |

12. Assinatura do titular

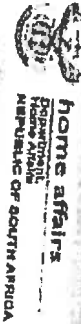
20.05.2027

Holder's alternative Signorini structure

16.12.1995

P<PRTPEREIRA<DA<COSTA<BRITES<<SETEFANE<<<<<<<<
CC594207<3PRT6612197M270520612957879<<<<<<<26

VISTOS VISAS



Control No. AA0569185

DHA-1635

RELATIVE'S VISA (SPOUSE)
TRC3560391

Ref No: KBL 139325/2024/TRUC

Name: PEREIRA DA COSTA BRITES SETEFANE

Passport No: CC594207

No. of Entries: MULTIPLE

Issued at: HEAD OFFICE

VISA Expiry Date: 2026-06-10

Valid From: 2024-06-10

Conditions:

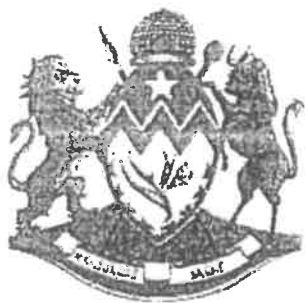
- (1) To reside with SA citizen or PR holder. ID/PRP number: 770725 0246 082.
- (2) May not conduct work
- (3) Subject to Reg. 3(7)

for Director-General: Home Affairs



A.M

S.B



DEPARTMENT OF HEALTH
PROVINCE OF KWAZULU-NATAL
GJGMRH HOSPITAL
DEPARTMENT OF SURGERY
 Private Bag X10609, Stanger, 4450
 Tel.: 032 4376172 / 032 4376173

DISCHARGE SUMMARY

| | |
|------------------------|---|
| PATIENT NAME | Stephen Dlamini |
| WARD | MALE SURGICAL |
| HOSPITAL IP NUMBER | 27570 27570 |
| OP NUMBER | 661719 |
| DATE OF ADMISSION | 22 / 11 / 2024 |
| DATE OF DISCHARGE | 23 / 11 / 2024 |
| FOLLOW UP DATE SOPD | PRN |
| PROVISIONAL DIAGNOSIS | Mild crush injury w ? urethral injury. |
| FINAL DIAGNOSIS | Mild crush injury. |
| PROCEDURE | |
| DATE | |
| SURGEON | N/A |
| FINDINGS | |
| COMPLICATIONS | |
| BLOODS | AFIM? 741 R |
| SPECIAL INVESTIGATIONS | KUB u/s
H NAD |
| CT
US
ENDOSCOPY | |
| ADVICE TO LOCAL CLINIC | PRN follow up |
| TTO | (1) Paracetamol 1g QID PO. (1/52)
(2) Tramadol 50mg QID PO. (1/52) |
| HEALTH EDUCATION | (1) |

Medical officer in charge:

DR TE Makhoba

Consultant in charge:

MR V Pillay

Intern in charge:

Dr P Ramekhal

AM

S.B

Tel: 012 361 2916
 Fax: 012 365 2966
 Cell: 082 680 5223
 Email: rcc33@gmail.com



ADVOCATE
**RICARDO
 ARCANGELI**

Centaur Chambers
 38 Ingersol Avenue
 Lynnwood Glen
 Pretoria

DATE : 15 January 2025

YOUR REF :

MY REF : State v Esmeal Maulide Ramos Nangy and two others case no A2190/2024

TO : GJGM REGIONAL HOSPITAL

"PER EMAIL"

E-mail : Thokozile.Fynn@kznhealth.gov.za; revan.kanhai@kznhealth.gov.za

Good day,

IN RE: STATE V ESMEAL MAULIDE RAMOS NANGY AND TWO OTHERS MAGISTRATES' COURT FOT THE DISTRICT OF KWADUKUZA CASE NUMBER A2190/2024

1. We confirm that we act on behalf of Mr Nangy with Westville prison number 224168821 and Mr Brites with Westville prison number 224169065 ("our clients") who have instructed us to obtain copies of their medical records held at the prison hospital.
2. Kindly find together with this letter our clients signed consent form for purposes thereof in respect of Mr Nangy and Mr Mlotshwa.
3. Our clients instruct that as far as they can remember they were brought to the hospital between 15 November 2024 – 10 December 2024
4. We request that the records be dispatched at your earliest convenience sine our clients intend to use those records at their bail application hearings set down for the 22 January 2025.
5. We await to hear from you.
6. Should you require any further information please contact the writer.

Kind Regards,
Adv. Ricardo Arcangeli
 Direct Tel.: 012 004 2823
 Cell: 082 680 5226

ADVOCATE RICARDO ARCANGELI
 115

1 | Page

Member of the Gauteng Society of Advocates

A.M

S.B

Tel: 012 361 2916
Fax: 012 365 2966
Cell: 082 690 5228
Email: rcy33@gmail.com



ADVOCATE
**RICARDO
ARCANGELI**

Centaur Chambers
38 Ingersol Avenue
Lynnwood Glen
Pretoria

Email: ricardo@ricardoarcangeli.co.za

ADVOCATE RICARDO ARCANGELI
LLB

Member of the Gauteng Society of Advocates

2 | Page

A.M

S.B

Ricardo Arcangeli

From: Kader, Adilla <Adilla.Kader@dcs.gov.za>
Sent: Friday, 17 January 2025 07:40
To: Info - Ricardo Arcangeli
Cc: Ricardo Arcangeli; 'Ricardo Arcangeli'
Subject: RE: STATE V ESMEAL MAULIDE RAMOS NANGY AND TWO OTHERS MAGISTRATES' COURT FOT THE DISTRICT OF KWADUKUZA CASE NUMBER A2190/2024:Request for medical records

Morning

Your email is noted.

Please be advised that this office will compile a memorandum and submit to the Regional Coordinator legal services Mr Hlongwane. Mr Hlongwane then forwards his memorandum to the Regional Executive for approval.

Approval is only provided by the Regional Commission KZN. Once we receive the approval we shall compile the documents and contact you accordingly.

We trust the above is in order.

Regards
 A Kader

From: Info - Ricardo Arcangeli <info@ricardoarcangeli.co.za>
Sent: Wednesday, 15 January 2025 13:14
To: Kader, Adilla <Adilla.Kader@dcs.gov.za>
Cc: Ricardo Arcangeli <Ricardo@ricardoarcangeli.co.za>; 'Ricardo Arcangeli' <riccy33@gmail.com>; Info - Ricardo Arcangeli <info@ricardoarcangeli.co.za>
Subject: STATE V ESMEAL MAULIDE RAMOS NANGY AND TWO OTHERS MAGISTRATES' COURT FOT THE DISTRICT OF KWADUKUZA CASE NUMBER A2190/2024:Request for medical records

Good day ,

With reference to the above matter kindly find the attached:

- correspondence for your urgent attention.
- 2x request for access to records
- Copy of the writer's ID
- The accused consent forms

Our clients require the information so requested for the purpose of their bail application hearing set down for the 22 January 2025.

We await your reply.

Kind regards

A.M

S.B

SOUTH AFRICAN POLICE SERVICES AND DEPARTMENT OF JUSTICE AND
CONSTITUTIONAL DEVELOPMENT

AFFIDAVIT

REF.:

CASE NO.:

**CRIMINAL CHARGES – KIDNAPPING / EXTORTION / THEFT / ASSAULT WITH
 INTENTION TO DO GRIEVOUS BODILY HARM / MALICIOUS DAMAGE TO
 PROPERTY / CORRUPTION / DEFEATING THE ENDS OF JUSTICE**

in the matter between:

ESMAEL MAULIDE RAMOS NANGY

1st Complainant

STEFANE PEREIRA DA COSTA BRITES

2nd Complainant

and

MOHAMMED INIATH RAOOF

Durban Metro Police

Telephone number 083 261 4315

YASEEN THEBA AND

VISION TACTICAL

Reg. No.: 2014/226522/07

VISION TACTICAL

HOLDINGS

Reg. No.: 2019/387408/07

VISION TACTICAL NORTH

Reg. No.: 2019/386245/07

Director and employee at Vision Tactical, Vision Tactical Holdings and Tactical Vision North Who had all material times acted within the course and scope of his employment with these companies.

Cell number: 084 222 2222

Telephone number: 011 014 4700

Email address: info at [vision@tactical.co.za](mailto:info@vision@tactical.co.za)

Physical address: 23 W. Street, Houghton 2198

| | |
|--|--|
| YUSUF DESAI AND ETREAM
DEFENCE PTY LTD Reg.
No.: 2022/862453/07 | <i>Director of Extreme Defence with business address situated at 1756 Mahatma Gandhi Street Stanga Central , KwaDukuza , KwaZulu Natal. Who had all material times acted within the course and scope of his employment with this company.</i>
<i>Telephone number: 0875633914</i>
<i>Email address: admin@extremedefence.co.za</i> |
| CAPTAIN AZILE ENOCH | <i>Director of Priority Crimes KZN</i> |
| CONSTABLE SINGH | <i>Stanga Detectives SAPS</i> |
| COLONEL DAWOOD | <i>identity number 7512145095086</i>
<i>Commander of the anti kidnapping unit</i>
<i>Couter State Security</i>
<i>Crime intelligence Head Office</i> |
| NHLANHLA LUCKY
MKHWANAZI | <i>KwaZulu Natal provincial police Commissioner</i>
<i>Telephone number: 031 325 4825</i>
<i>Email address: provcomm.kzn@saps.gov.za</i> |
| COLONEL DEENA
GOVENDER | <i>Directorate of Priority Crimes KZN</i> |

CONFIRMATORY AFFIDAVIT

I, the undersigned,

STEFANE PEREIRA DA COSTA BRITES

(Passport No.: CC594207)

do hereby make oath and say that:

S.B

1. I am an adult 58-year old male, with my residential address situated at Primrose, Johannesburg. My legal representative's contact details are (012) 923 0603, (012) 004 2823, cell number 082 680 5226 and email address ricardo@ricardoarcangeli.co.za.
2. The facts deposed to here by me are within my personal knowledge and believe both true and correct, save where I indicate otherwise or is apparent from the context.
3. I have read the affidavit of Esmael Maulide Ramos Nangy and confirm the content thereof insofar as it applies to me.
4. Further to that, during the times where Mr Nangy himself indicates that he was subject to abuse and torture, I was with him and I was also arrested at the same time. It being recalled that I was going to take his car to the mechanic to be repaired, as alluded to by Mr Nangy at the point when we were arrested.
5. In respect of the torture, I was alongside him (but not at the Farm in Stanga) and suffered the same fate as him, except, in addition to what he said, I am also at the moment suffering partial paralysis on the throat after being severely choked at the "black site". I would like to draw attention to the fact that substantial damage was caused to my body, pursuant to the torture as particularised in Mr Nangy's affidavit, specifically that I had a crushed larynx as well as injuries to my groin area and my right wrist. My legal representative has requested the hospital records from the Westville Prison, but has not been furnished with those records as yet, so I cannot attach them to this affidavit. I do, however, have a document titled "*discharge summary*", which indicates that I was admitted to GJGMRH Hospital on 21 November 2024, where I was first taken to the clinic at Stanger and, on 21 November 2024, transferred to the hospital

S.B

| |
|--|
| ISIFUNDAZWE SAKWAZULU - NATAL |
| EZENPILLO |
| 21 NOV 2024 |
| DEPARTMENT OF HEALTH
KWADUKUZA CLINIC |
| PROVINCE OF KWAZULU - NATAL |

661219

Assist
KOC
Steph
Dr H de Galle