

AFFIDAVIT OF NORBERT GLENN AGLIOTTI

I, the undersigned,

NORBERT GLENN AGLIOTTI

do hereby take oath and state:

1. I am an adult male 51 years of age, a businessman by profession residing at 4 The Savoy, Mount Street, Bryanston, Johannesburg.
2. The facts herein contained are within my personal knowledge unless otherwise stated and are both true and correct.
3. I have been shown a document labelled "*Sworn Affidavid*" and wish to explain the circumstances in which I signed it.
4. On 4 January 2008 at approximately 17h00, I was contacted by a certain Dennis to attend a meeting at an office park in Rivonia. This call was made to my mobile telephone but registered on it as being from a private caller.
5. At the time I was at Peacanwood Golf Estate with the knowledge of the DSO. My family and I had partaken of a late lunch and I had drunk a substantial amount of wine.



6. Dennis instructed me to make a statement relating to how the DSO had treated me. A person by the name of Tanya Volschenk was present and known to me. Tanya typed the statement on her laptop. This statement was printed and then carried by Dennis to the Balalaika Hotel in Sandton.
7. Upon Dennis and my arrival at the Balalaika Hotel, we followed a gentleman who requested us to accompany him to a particular room in the hotel. We then did so.
8. Upon arrival in the hotel room, I was introduced to *inter alia* Mr Manzini. Mr Mphego, who is a very high ranking police officer and known to me, was also in the room and I greeted him along with the other people present.
9. I was then advised that if they required any other statements from me they would contact me. It was made clear to me that they did not want me to give them any information or affidavits regarding other matters in which I had made affidavits or where I was to be a witness.
10. This affidavit was signed in the hotel room in Sandton and not in Brixton. The oath was taken by a police officer who was in an

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adjoining room, but came through with the necessary stamp to take my oath.

11. I did not go to Brixton at any time on 4 January 2008. The words written at the end of the affidavit are in my own handwriting but I cannot decipher what I meant at the time.
12. I was not given an opportunity to read the statement in order to verify the allegations made therein but I merely signed same.
13. There are numerous factual errors in the statement. In particular I wish to record that:
 - 13.1. I played no role in the alleged strategising to save the existence of the DSO by bringing down National Commissioner Selebi;
 - 13.2. Adv Gerrie Nel never said that he did not care about the Papparus drug matter or that his sole and prime objective was to prosecute Selebi.
 - 13.3. At no stage was any mention made of a political game which involved the intended demise of Zuma, Manzini, Billy Masetla (to name but a few);



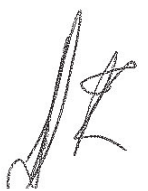
- 13.4. The political project which involved the overthrow of the law enforcement and intelligence agents of this country was something that was told to me by the late Brett Kebble;
- 13.5. At no stage did anybody from the DSO tell me that they acted for the benefit of outside forces such as the CIA and FBI;
- 13.6. The late Brett Kebble told me that Bulelani Ngcuka's wife was Minister of Minerals & Energy Affairs and wanted to control the mining resources of the country as had happened in many other African countries like Nigeria and Angola;
- 13.7. I do not refer to the late Brett Kebble as "*our late comrade*";
- 13.8. During my incarceration at the Sandton Police Station I was never interrogated. All the statements that I made to the DSO were made freely and voluntarily by me with the assistance of my legal representatives and either in my handwriting or that of my advocate, Laurance Hodes;

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- 13.9. The initial approach to co-operate with the DSO was made by my legal representatives upon my instructions and not by the DSO to them;
- 13.10. At no stage was it told to me that the drug matter in question is not important;
- 13.11. Adv Gerrie Nel did not tell me that he had made a mistake embarking on this project or that he had done so with the view to saving the existence of the DSO;
- 13.12. It is a matter of record that I was released on bail in the amount of R500 000.00 and only thereafter paid a further amount of R500 000.00 in a second and unrelated matter;
- 13.13. The first bail amount was paid by means of money and the second bail amount was secured by means of a guarantee;
- 13.14. I did not have personal knowledge of the allegations against Selebi as a result of anything that I had been told by members of the DSO but rather from what I had read in the press;



- 13.15. At all times, as recorded in my plea and sentence agreement, I undertook to testify in any matters in which I was required to do so by the DSO. I have never maintained that I never ever bribed Selebi or that I was not going to testify;
- 13.16. The threats that are referred to in my affidavit are to the effect that if I was incarcerated, I would not spend time with my family. I was also told that if the other charges were laid against me, I could be incarcerated before the birth of my son;
- 13.17. At no stage did the DSO tell me that they together with the NPA were "*the law*" that governed the country as well as justice in South Africa;
- 13.18. My legal fees to date do not come anywhere near R3 million;
- 13.19. Despite the consequences suffered by me personally, at no stage was the planned operation by the DSO intended to destabilize the country.

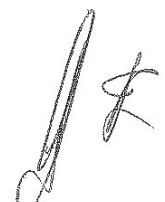
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14. Had I been afforded the opportunity to read my statement, I would have detected the numerous spelling errors and factual inaccuracies.
15. I have always utilised Attorney Robert Kanarek and Adv Laurance Hodes. I have never signed any document relating to this matter or any other matter concerning the DSO without their prior approval.
16. Had I been offered the right to legal representation, I would have insisted on being legally represented and would not have signed the document.
17. I was misled into believing that the document was not to be utilised in any public manner. For this reason, I was told that I could utilise the phrase "*Without Prejudice*" at the top of the document.
18. I am a layman of the law and do not understand the legal consequences of this term but reiterate that I was assured that the document would not be utilised for any purpose whatsoever and that the only reason why they wanted me to sign it was to express my personal grievances with the manner in which I had been prosecuted. I have steadfastly maintained that I was not given a

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fair opportunity to negotiate with the DSO as a result of deals that had previously been concluded with *inter alia* Clinton Nassif.

19. Mr Manzini assured me that he was the most powerful man in the country and would take care of me. I interpreted this to mean that the previously negotiated section 204 deals could be set aside and I might be able to secure an indemnity. I wanted to align myself with him in an attempt to negotiate a better deal for myself and thought that I would be given the opportunity to refine the details of the document at a later stage.
20. On Monday 7 January 2008, I was summoned to another meeting with members of the NIA at Villa Via in Sandton by the aforementioned Mr Mphego. Present at this meeting were Mr Mphego, another member of NIA who is only known to me as Sam and various other people who were not introduced to me by name.
21. This meeting was video taped. I made it clear that I wanted legal representation. I was told that there was no objection to me obtaining legal representation and that the meeting was once again an off the record informal meeting which could later be refined in the presence of and subject to the approval of my legal representatives. This did not occur.

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22. I made it clear during the video interview that I insisted upon my legal representatives verifying any document that I was required to sign. I suspect that my insistence upon legal representation is the reason why the video tape was not utilised.
23. I have been misled and take exception to the utilisation of the "*Sworn Affidavit*" in the public domain when I was assured that it would not be utilised. I reiterate that I did not peruse it prior to signing it. The allegations contained therein are not clearly set out and have been misconstrued for political purposes.
24. I apologise for any inconvenience that might have been caused by my signing the aforementioned document, but wish to explain that:
- 24.1. I was led to believe that I was obliged to sign it because the people from NIA required me to do so;
- 24.2. I was assured that it would not be utilised in the public domain;
- 24.3. I did not verify its contents prior to signing it; and
- 24.4. I always intended to refining it with the assistance of my legal representatives.

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25. I was told by Mr Manzini that if there were any queries relating to my attendance of the meeting, I was to refer such enquiries to him. To this end, I was given his mobile telephone number, which is 078 831 8840.

26. After the aforementioned document was utilised in an application in the above Honourable Court, my legal representatives were approached by members of the DSO and requested to ascertain precisely how it had come about that I signed such a document.

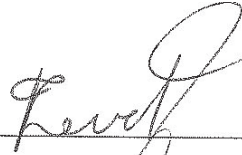
27. This affidavit is intended to explain what transpired prior to my signing of the aforementioned document. Due to the urgency with which it was prepared, I undertake to provide further details relating thereto if I am required to do so.



DEPONENT

I hereby certify that the Deponent has acknowledged that he knows and understand the contents of this affidavit, which was signed and sworn before me at JOHANNESBURG on this 10 day of January 2008, the regulations contained in Government Notice No R1258 of 21 July 1972, as amended, and Government Notice No R1648 of 19 August 1977, as amended, having been complied with.



**COMMISSIONER OF OATHS**FULL NAMES: *Jerome Levitz*BUSINESS ADDRESS: *Flushing
11 Biermann Ave
Rosebank*DESIGNATION: *Attorney*AREA/OFFICE: *JHB*