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Your Ref: Mr. Dyantyi
Our Ref: TNS/PUB1/0028

7 March 2023

Mr QR Dyantyi MP

Chairperson: Committee of the Section 194 Enquiry
Parliament Building
Parliament Street
Cape Town

Per Email: tngoma@parliament.gov.za

Dear Chairperson,

RE: WITNESSES TO BE CALLED ON BEHALF OF THE PUBLIC PROTECTOR

1. We write to you as a follow up on the vexing questions of outstanding witnesses which the Public Protector wishes to call.
2. As you will recall and in terms of our letter dated 28 February 2023 we had identified three categories of witnesses which the Public Protector wishes to call namely: -
 - (a) Witnesses to be summoned on the basis of being refused to testify voluntarily (i.e. President Ramaphosa, Mr Gordhan and Ms Mazzone);

Directors: Theophilus Noko Seanego BProc, LLM (Corporate Law); Maribe Malope BA Law, LLB, Dip. (Labour Law). **Senior Associate:** Phiwokuhle Mnyandu LLB, Dip. (Labour Law), LLM (International Commercial Law). **Associates:** Nondumiso Nsibande LLB; Nqubeko Makhanya LLB; Nafeesa Patel LLB, LLM (International Commercial Law). **Candidate Attorney:** Rebecca Chimuka LLB, LLM (Tax Law). **Consultant/Conveyancer:** Sampson Shadung BProc, LLB.

- (b) Witnesses to be recalled to complete their cross-examination (i.e. Mr Van Loggerenberg, Mr Pillay and Ms Baloyi); and
- (c) Witnesses who had been approached for voluntary participation (i.e. Mr Maimane, Adv Maema and Mr Linda).

3. This letter only concerns the witnesses under category (c) above.

Mr Maimane

4. We are delighted to inform you that following our request to him to testify voluntarily, Mr Maimane has now agreed to avail himself in respect of the two relevant and key reports where he was involved i.e. the CR17/BOSASA and Vrede reports.

Adv Maema

5. Adv Maema has agreed in principle to attest in respect of the so-called “Rogue-Unit” report, subject to permission by the NDPP granted in terms of section 41(6) of the NPA Act.

Mr Linda

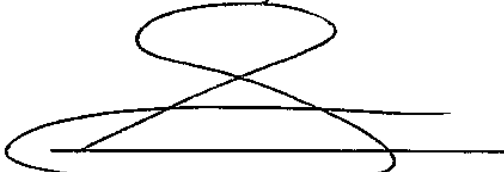
6. Given the evidence of Ms Mvuyana and Mr Mataboge there will be no need to call Mr Linda to the witness stand.

Request

- 7. Accordingly and in line with the requirements of fairness we are instructed to request the Committee to schedule the calling of Mr Maimane and to be alerted of the possible permission to call Adv Maema.
- 8. Please schedule the calling of Mr Maimane accordingly. We will keep you posted on the other potential witnesses as soon as possible, failing which we may have to abandon our intention to call them.
- 9. Please respond urgently with the scheduling of Mr Maimane so that we can proceed to prepare his statement, as agreed.

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Yours faithfully

A handwritten signature in black ink, consisting of a large, stylized loop that crosses itself, followed by a horizontal line.

SEANEGO ATTORNEYS INC.

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