AFFIDAVIT

I, the undersigned

Jacques Christiaan De Klerk

Hereby make oath and state in English:

1.

I am an adult male with identity number 6807185025089. My mobile number is 0790698398. I am the owner of Zinandi Specialised Investigations.

2.

This affidavit is made by me in my sound and sober senses, freely and voluntarily and without anyone influencing or forcing me to do so. I declare that the information contained in this affidavit is within my personal knowledge and belief true and correct unless otherwise stated.

3.

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3.

A ALL

I am duly authorized to make this statement and to depose to this affidavit. I make this statement out of my own free will and have not been promised any reward, monetary or otherwise, for making this statement. This statement consists of 3 pages. I have initialed each page and read the statement before I signed it.

4

During November 2011 I was tasked by SAAPIL to obtain statements from different persons as set out below:

- A) Funani Beauty Ngobese Id number 6009200777089. Statement was taken on 13/12/2011 at 14:19 PM in Meadowlands Soweto.
- B) Flora Jose Guibomane Passport number AB 164228. Statement was taken on 18/12/2011 at 16:35 in Katlehong.
- C) Khombisile Joyce. Mazibuko ld number 6807110645084. Statement was taken on 8/12/2011 at 15:05 in Mapleton.
- D) Siyabuya Siwepo Id number 8504106283081. Statement was taken on 13/12/2011 at 10:55 in Tsakane.

5

During July 2014 I was informed that the contents of these statements were described as "concocted". I am a duly authorized commissioner of oaths with appointment reference JK 528/11 dated 8/2/2011. I therefore see these allegations of "concocting" evidence in a serious light and I am currently in the process of obtaining legal counsel in this regard.

6

The statements obtained from individuals were made by each in his/her sound and sober senses, freely and voluntarily and without anyone influencing or forcing them to do so. Deponents were duly authorized to make these statements and to depose to these affidavits. Individuals made these statements out of their own free will and were not promised any reward, monetary or otherwise, for making these statements.

2

It needs to be mentioned that Zinandi Specialised Investigations have no vested interest in the outcome of this case. No details of incidents were known prior to interviews and the deponent was therefore the only source of information. Logic dictates that to "concoct" one should at least have knowledge of what you are "concocting" about. The allegations are rejected in the strongest possible terms and will be treated with the contempt it deserves.

8

Do you know and understand the contents of this declaration? Yes

Do you have any objection to taking the prescribed oath? No

Do you consider the prescribed oath to be binding on your conscience? Yes

Deponent's Signature

Deponent's Name

I certify that the Deponent has acknowledged that he/she knows and understands the contents of this affidavit, that he/she does not have any objection to taking the oath, and that he/she considers it to be binding on his /her conscience. This affidavit was sworn to before me and the Deponent's signature was placed hereon in my presence in <a href="https://www.contents.com/www.com/www.contents.com/www.com/www.contents.com/www.contents.com/www.contents.com/www.contents.com/www.contents.com/www.contents.com/www.contents.com/www.co

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Affidavlt

I, Hendrik Roedolf Scholtz states under oath in English.

1

I am an Adult male with ID 740218 5100 089 and employed at Ferlio, Group of Investigators as Investigation Manager, S70 John Scott street, Constantia Park, Pretoria with cell phone numbers 082 . 719 6226.

2

I have been in the SAPS Brooklyn and SAPS Organized Crime specialized driven project unit and a Reservist at Brooklyn SAPS from 1992 until 2006. I have done investigations.

3

On 2013/03/21 I was contacted to do investigation for SAAPIL, whereby a list of names was handed over tro me to obtain statements regarding how the clients got to know about Norman Berger and Partners regarding a clain they instituted against the Road Accident Funds after being involved in an accident.

4

The Following people were interviewed by myself, Jaco Coetzee and Isaac Ndlovu that assisted as a translator whereby Statements as well as attachecments were obtained. The mentioned individuals have not been threatened in any way or manner. The have not been promised any compensation to this regard. The statements was made out of their own free will.

5

- Doreen Phalane 670102 0713 084 and cellphone number 084 703 6730
- Brandle Maboya 740309 5677 083 and cellphone number 073 542 2675
- Corrine Matchumele 730104 0475 084 and cellphone number 082 408 8610
- Mariam Masal 530312 0756 088 and cellphone number 079 110 9934
- Khomisani Constance Hlungwani 771019 0255 080 and cellphone number 073 923 0281
- Mbazima Neison Hlungwani 710917 5392 085 and cellphone number 084 805 52

6

All the above individuals statements was translated to them by Isaac Ndlovu and then signed in front of an SAPS member at a Police station where they were informed again of all the facts stated in this statements as per SAPS stamps on the statements.

7

I know and understand the contents of the above written statement.

MM MG

I have no objection in taking the prescribed oath.

I find the prescribed oath to be binding to my conscience.

Johannesburg

2013/07/09

06:30

Hendrik Roedolf Scholtz

2013 7 . 09