

THE HIGH COURT OF SOUTH AFRICA  
NATAL PROVINCIAL DIVISION

CASE NO: CC358/05

In the matter between :

**THE STATE**

and

**JACOB GEDLEYIHLEKISA ZUMA**

**ACCUSED NO. 1**

**THINT HOLDING (SOUTHERN AFRICA) (PTY) LTD**

**ACCUSED NO. 2**

**THINT (PTY) LTD**

**ACCUSED NO. 3**

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**CONFIRMATORY AFFIDAVIT**

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I, the undersigned,

**ROBERT FRANK DRIMAN**

do hereby make oath and say that :



1.

I am an attorney of the above Honourable Court practising as such as a director of Deneys Reitz Incorporated at 82 Maude Street, Sandton, Gauteng. I have been practising as an attorney for 15 years.

2.

Until May 2004 I represented Thales International and its subsidiaries in Southern Africa including Accused Nos. 2 and 3 and their officials and employees in relation to investigations which commenced in May 2001. I acted for Accused No. 3 during the period it had been charged in the criminal case of State vs Schabir Shaik & Others until my instructions ended in the criminal case in May 2004. I continued to act for Thint Holding (Pty) Ltd, Thint (Pty) Ltd and ADS in other civil matters.

3.

I represented Accused No. 3 during the negotiations referred to in the affidavit of PIERRE JEAN MARIE ROBERT MOYNOT, which affidavit I have read, and which led to the conclusion of the agreement set out in the letter by the then National Director of Public Prosecutions, Mr B Ngcuka, dated 4 May 2004.

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4.

My recollection of the events that preceded the conclusion of the agreement is as set out hereunder.

5.

5.1

Shortly before 12 March 2004, I was instructed by Moynot to address a letter to Dr. P.M. Maduna, who was then the Minister of Justice and Constitutional Development, to request a meeting with him. I was informed by Moynot that arrangements had already been made with Maduna for such a meeting and that my letter was to be a formal record of the request for such a meeting. Pursuant to these instructions and on or about 12 March 2004, I addressed a letter to Maduna in which I requested the meeting with him. I annex hereto marked "RFD1" a copy of this letter. It should be noted that "RFD1" was not marked "without prejudice", nor was there a request that the meeting should be regarded as confidential or off-the-record.

5.2

The meeting was considered necessary, according to my instructions, by Accused No. 3 and the other companies in the Thales Group because of the adverse publicity connected with the fact that Accused No. 3 had been

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charged together with Mr Shaik and others in the case which was due to commence on 11 October 2004.

5.3

An additional concern was the warrants of arrest issued in respect of Mr Thetard. At that stage we were aware of the existence of warrants but did not know specifically how many and in respect of which specific charges.

5.4

A further concern was the existence of the Letter of Request for mutual legal assistance that we were aware of that had been made to the French authorities. We were also made aware of similar applications directed at the judicial authorities in Mauritius and Turkey.

6.

I was later informed by Moynot that Maduna had agreed to meet with us at his home on the 5 April 2004 and that I should address a letter to him to confirm the meeting. I did so. Annexed hereto marked "RFD2" is a copy of a letter dated 2 April 2004 confirming the meeting. Again, it should be noted that the letter was not marked "without prejudice", nor did it make any reference to the meeting being confidential or off-the-record.

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7.

On 5 April 2004, I attended the meeting together with Mr Moynot, Mr A Sooklal, an attorney attached to the present attorneys of record for the Applicant, and Ms. C Guerrier, a French lawyer of the Applicant's parent company in Paris. Ngcuka was also present at the meeting with Maduna although he arrived shortly after we had been introduced to Maduna. Nothing about this matter had been discussed before Ngcuka had arrived. No objection was manifested by either Ngcuka or Maduna to the presence of Moynot and Guerrier, who were introduced to them as representing the clients I was acting for.

8.

After our arrival and even after the arrival of Ngcuka, Maduna did most of the talking. The initial stages of the meeting were engaged by pleasantries in relation to matters which are not necessary to mention here.

9.

In neither of my letters which preceded the meeting was there any suggestion that the discussions were expected to be confidential and off-the-record. Maduna never responded to suggest otherwise. Even during the meeting no

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mention was made by either Maduna or Ngcuka about any expectation that the protocol concerning confidential and off-the-record discussions be observed. I was meeting with Maduna and Ngcuka as representatives of their respective offices.

10.

When the meeting commenced, Maduna engaged in informal pleasantries. Thereafter, I briefly summarised the representations on behalf of those that I represented, particularly Thales International, Accused Nos. 2 and 3 and Thetard. I requested that Ngcuka consider withdrawing the charges against Accused No. 3, the warrants of arrest against Thetard and the withdrawal of the application for mutual legal assistance that had been sought for and obtained against Accused No. 3's parent company, viz., Thales International in Paris and its employees, including Thetard.

11.

Maduna then talked for some time referring to the criminal matter and the other matters referred to by Moynot in paragraph 26 of his main affidavit. He seemed to have had a good knowledge about the matter. He stated that on his understanding of the issues he was prepared to recommend to Ngcuka to withdraw the charges and the warrants of arrest in relation to Thetard, whereafter, he referred to Ngcuka and sought his response.

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12.

Ngcuka indicated that he would be prepared to consider the request that I had made if Mr Thetard was willing to provide an affidavit of a brief nature concerning an "encrypted fax". By that time I had known of the existence of an "encrypted fax" which featured in publicity concerning an application which was brought by Accused No. 1 against the State for production of this document. When questioned about what he expected in the affidavit, he stated that he wanted confirmation that Thetard was the author of the handwritten "encrypted fax".

13.

I requested an opportunity to confer with Moynot, Sooklal and Guerrier regarding Ngcuka's request for the affidavit. After taking instructions, I returned to the room and requested Ngcuka arrange to provide me with a copy of the "encrypted fax" so that I could take instructions and revert.

A handwritten signature in black ink, consisting of a large, stylized capital 'A' followed by a smaller, cursive 'a'.

14.

Ngcuka telephonically arranged for McCarthy to provide us with an opportunity to view this document. The next afternoon McCarthy enabled us to see this document. Both Guerrier and I inspected the document. Since I do not understand French I could not consider the contents of it but rather focused on the document itself. I noticed that it was creased as though it had been crumpled. Annexed hereto marked "RFD3" and "RFD4" are copies of letters dated 6 April 2004, which I addressed and despatched to Ngcuka and Maduna, respectively, regarding the meeting that was held the previous day. Neither of them have disputed the contents of these letters. Save for the last paragraph which appears in "RFD4", but not in "RFD3", the contents in each letter are identical.

15.

Regarding "RFD3" and "RFD4" :-

15.1

The "evidence" referred to in the first and third sentences of the second paragraph of this letter, is a reference to the copy of the handwritten "encrypted fax".

15.2

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The "witness" referred to in the second sentence in the second paragraph, is a reference to Thetard.

15.3

The request made in the penultimate sentence in the third paragraph, was a request to be informed about the precise implications for Thetard and the clients I represented, which might arise if Thetard provided the affidavit that was required.

16.

Having received no response from either Ngcuka or Maduna, I was then instructed by Moynot to engage senior counsel to execute the agreement with Ngcuka on the basis of the proposals made and discussed during the meeting at Maduna's home on 5 April 2004, by undertaking to provide an affidavit by Thetard confirming that he was the author of the handwritten "encrypted fax" in exchange for an undertaking from Ngcuka to withdraw the charges against Accused No. 3 once so provided with the affidavit of Thetard.

17.

I instructed Mr H K Naidu SC from the Durban Bar. Naidu SC met with Maduna on the 17 April 2004 at his home in Johannesburg to confirm the proposals agreed between myself and Ngcuka in his presence. This meeting occurred in

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the presence of Sooklal. Thereafter, Naidu SC met Ngcuka on 19 April 2004 at his office in Pretoria. Consequent upon the meeting I was requested to fetch a letter from Ngcuka on the same day. That afternoon I collected from McCarthy annexure "LM31", which recorded Ngcuka's undertaking. Later that evening, I travelled to Paris with Moynot, Naidu SC and Sooklal to consult with Thetard in order to facilitate compliance with the agreement that had been concluded with Ngcuka.

18.

On 20 April 2004 we consulted with Thetard. I first spoke to Thetard alone about the purpose of our visit, and what was requested. After that discussion he consulted with Naidu SC in my presence. Thereafter he executed the affidavit which is annexure "LM32". The annexure "X" referred to in "LM32" is a copy of the handwritten "encrypted fax" which was given to me by McCarthy to facilitate my consultation with Thetard.

19.

A letter dated 4 May 2004, a copy of which is "LM33", was sent by Ngcuka to Naidu SC confirming acceptance of the affidavit.

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20.

I have been shown the responses by the deponents for the State to the affidavit of Moynot.

21.

To my mind, there appeared no doubt that what was sought by my clients from the Ngcuka in exchange for providing the evidence he required in connection with the "encrypted fax", was a withdrawal of the charges against Accused No. 3, the warrants of arrest against Thetard and of the request for mutual legal assistance amongst which we understood was that which was made to the French authorities. Having regard to the discussions at Maduna's home, the contents of my letters dated 6 April 2004 and the agreement finally concluded between Ngcuka and Naidu SC, I was confident that that was the end of the matter as regards Accused No. 3.

22.

At no stage prior to my meeting with Maduna did I have any discussion with him. I had no part in the arrangements for the meeting. I understood from Moynot that the arrangements for the meeting had been made by Sooklal. I was only instructed to write a letter requesting the meeting and then confirming, in

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writing, the date thereof. I have no idea about the involvement of any "intermediaries" prior to my meeting at Maduna's home. At no stage, either prior thereto or during the meeting, did I say anything to create the impression that my meeting with Maduna and Ngcuka was in any way related to any previous approach to them. I therefore disagree that Maduna had any reason to believe that our meeting with him at his home "was a culmination of" other meetings or that he had any reason to say to Ngcuka that I requested to meet with them "again". I did not understand my purpose there was related in any way to assuring Ngcuka and Maduna of the *bona fides* of those I was representing. Furthermore, I dispute Maduna's evidence in paragraph 27 of his affidavit that I approached him or that my clients had sought the meeting because "they were now ready to co operate".

23

I have read Moynot's account of the meeting at Maduna's home as set out in paragraphs 25 to 29 thereof. I agree with the general nature of the discussions as deposed to by Moynot as to what was said and by whom.

  
\_\_\_\_\_  
DEPONENT

I CERTIFY that the Deponent has acknowledged to me that he/she knows and understands the contents of this affidavit which was SIGNED and SWORN to before me at SANDTON on this 21<sup>ST</sup> day of AUGUST 2006, the Regulations contained in Government Notice Nos. R1258 dated 21 July 1972 and R1648 dated 16 August 1977, as amended, having been complied with.



**THEVARANI TIPRU**  
COMMISSIONER OF OATHS  
BY APPOINTMENT - PARALEGAL  
REFERENCE NUMBER: 9/18/2 RANDBURG 27.07.2004  
ABN AMRO HOUSE, 35 MAUDE STREET  
SANDTON,  
JOHANNESBURG 2196

COMMISSIONER OF OATHS

NAME :

CAPACITY :

ADDRESS :

AREA :



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Your Ref  
Dr P M Maduna

Our Ref  
THI20  
Mr R Driman

The Honourable  
Dr P M Maduna  
Minister of Justice and Constitutional Development

12 March 2004

Dear Dr Maduna

## **BUSINESS OF THALES GROUP COMPANIES IN SOUTH AFRICA**

As you are no doubt aware, we have over a period of time been concerned with and about the on-going allegations and accusations made about companies within the Thales Group ("our clients"), and of its officers and employees.

It goes without saying that these allegations and accusations – while treated seriously – are denied.

It is also true that group companies have made great strides in South African industry, which is a matter of pride to our clients' group as a whole. The opportunities in Africa, and for trade from South Africa, remain positive.


We therefore approach you in a spirit of transparency to enquire whether you are amenable to meet with us and our clients to investigate whether an acceptable resolution is possible to the impasse which now exists regarding the allegations and our clients' denial of them.

THI20 LTJUSTICEMIN12MAR04

Directors: MJ Hart (chairman) MH Alexander MS Ash S Barnett C Basson AF Bembridge \*HI Bisset GG Bouwer PA Bracher JNR Caldwell AJ Chappel PM Chronis CM Corke LM Cresswell KR Cron HL Crosby MO Dale BM Denny TJ de Wet D Dinnie AGS Dixon KZ Dlothi RF Driman RJ Erasmus KL Gawith \*\*PFL Geromont AP Gibbs JE Gillmer SWM Gule SD Gwina AB Hardie MC Hartwell DD Hayward RJ Holwill RG Hooker RB Isaacs M Jacobs HJ Janse van Rensburg DS Kapelus M Kapelus L Kek JM Kron MR Kyle \*RDE Lomax TP Mabasa BW Macgregor M Middleton AA Moosajee LA Morphet JRM Mthibeli P Naude JM Neaves HC Nieuwoudt GL Noeth RA Otty AD Parsons \*\*\*BG Patterson M Philippides L Rach DK Reed BK Raw APM Robinson FD Schulz RA Scott LC Shawe P Simkins CI Stevens MT Steyn AP Stiles AK Strachan P Turnbull M van der Westhuizen CL van Heerden C van Loggerenberg PC Viljoen A Visser SHE Voigt L Vorster AP Vos DA Wanblad GN Wentlink St E Wilken C Woolley

French Avocat: PFL Geromont \*British \*\*German \*\*\*Irish

Johannesburg Cape Town Durban



We make ourselves available to meet at your earliest convenience, at any place that may suit you and/or your team.

We look forward to hearing from you.

Yours faithfully

  
DENEYS REITZ



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THI20  
Mr R Driman

The Honourable  
Dr P M Maduna  
Minister of Justice and Constitutional Development

2 April 2004

Dear Dr Maduna

## **BUSINESS OF THALES GROUP COMPANIES IN SOUTH AFRICA**

We refer to our letter of 12 March 2004 and your proposal that we and our client meet with you on Monday, 5 April 2004 at 17h00 at your home in Bryanston.

We confirm that we and our client will meet you then and we thank you for your assistance.

Yours faithfully

  
**DENEYS REITZ**

THI20 LTJUSTICEMIN2APR04

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Mr R Driman

The Honourable  
Dr P M Maduna  
Minister of Justice and Constitutional Development

6 April 2004

Dear Dr Maduna

## BUSINESS OF THALES GROUP COMPANIES IN SOUTH AFRICA

We refer to the meeting at the home of the Minister, and we record our appreciation and that of our client at your being prepared to discuss matters of mutual concern.

We have viewed the evidence that we requested to see and which you facilitated us seeing. You will recall that our request was based on the propositions made to us regarding the idea of co-operation which still may be required from a witness in the employ of our client. We are assisted in taking meaningful instructions from our clients by you having been permitted us to view the evidence.

Upon reflection of the evidence which we saw and consideration with our client, it appears to us that we still require your further indulgence before we may respond more fully. It was mentioned to us that simple evidence of a brief nature— to whatever effect the evidence may be (which we cannot pre-judge because we have not taken an instruction) - may be sufficient to answer the requirements you have. We request that you inform us precisely what it is that you would want to know of the witness. This is because when reviewing the evidence against the charge sheet it appears to us that the evidence of this witness may only be peripherally relevant to the charges now before the court, or maybe not at all.

We point out that if the evidence which it is suggested may be required is asked for, one possible answer (without prejudging what it may be) may have severe consequences other than legal consequences, which our client has had to inform you previously it could not entertain being a party to.

THI20 LTJUSTICEMIN6APR04

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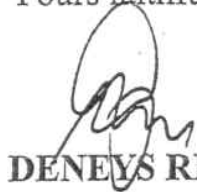


Besides, should our client agree to give such requested evidence, our client will require certain safeguards to ensure no possible further consequences to its international reputation and integrity.

We would accordingly enquire in addition, if the witness gave evidence, what certainty our client may be afforded regarding the finality of the request and its need to give evidence, and what safeguards may be afforded to ensure a finite end to the matter.

Your further indulgence in attempting to resolve this complex matter is greatly appreciated. In this regard, we are under advisement to request that Advocate M Moerane SC and Advocate H K Naidu SC may be able to be of assistance on behalf of the office of the NDPP to attempt to resolve the matter with us.

Yours faithfully



**DENEYS REITZ**



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Your Ref

Adv B Ngcuka

Our Ref

THI20

Mr R Driman

Advocate B Ngcuka  
National Director  
The National Prosecuting Authority of South  
Africa

6 April 2004

Dear Advocate Ngcuka

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Upon reflection of the evidence which we saw and consideration with our client, it appears to us that we still require your further indulgence before we may respond more fully. It was mentioned to us that simple evidence of a brief nature- to whatever effect the evidence may be (which we cannot pre-judge because we have not taken an instruction) - may be sufficient to answer the requirements you have. We request that you inform us precisely what it is that you would want to know of the witness. This is because when reviewing the evidence against the charge sheet it appears to us that the evidence of this witness may only be peripherally relevant to the charges now before the court, or maybe not at all.

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Yours faithfully



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