

So is your evidence that the police threw certain teargas cannisters into the crowd and when they ran away they were cold-bloodedly shot? -- That is my evidence.

And did these events take place at your school or at any other school in Orlando West? -- At our school in Orlando West.

Was there any activity going on at the Orlando West Junior Secondary School on that specific day? -- No, I do not know what happened at the junior secondary school, I was attending school at the Orlando West High School. (10)

And how far away from your high school is the junior secondary school of Orlando West? -- They are not very far apart, just across the fence.

Did you read any newspaper reports relating to the events during the riots in 1976? -- Yes, at times I did.

And were you satisfied with the way in which the events were reported in the Rand Daily Mail? -- I read the World.

Nevertheless, I am going to read to you from a report in the Rand Daily Mail of the 17th June, 1976 and I want to know whether you want to comment upon this report. This is (20)
a report by Nat Serate, the well known journalist, dealing with the events of the 16th June, 1976:

"About 30 000 pupils ranging in age from 7 to 19 from most of the secondary and high schools in Soweto, together with a few primary schools, marched from different points in Soweto to Orlando West Junior Secondary School. Senior pupils on several occasions warned the boys and girls not to be violent." (30)

-- Yes.

"About/...

"About 10 000 had assembled outside the school and was singing "Moreno deloka setshaba" when police arrived in vans and with dogs."

-- Yes.

"I did not hear the police give any order to disperse before they threw teargas cannisters into the crowd of singing school children. The children scattered in all directions while some were dazed and blinded by the teargas. The pupils then regrouped and when the police charged again, they threw stones at the police."

(10)

Did you see this happen that before shots were being fired the students threw stones at the police? -- No.

But you say that you were on the scene on that particular day. -- I was there, yes.

"The police then fired a few shots, some in the air and others into the crowd. I saw four school children fall to the ground."

(20)

-- Yes.

That you did see. -- What I saw is immediately the police arrived, they let loose the dogs. One dog bit a school child on the thigh. The others then returned to rescue the child who has being bitten by the dog, by hitting the dog. That was when the police started shooting. It was thereafter that the children started dispersing, they ran in different directions.

Let us return to Mr Serate's story.

(30)

"The mob then charged the shooting

policemen/...

policemen and when the police dog was let loose, it was stabbed with knives. As it lay already on the ground, it was beaten with stones and bricks."

-- I do not dispute that the dog was stoned, but it was let loose by the police on the school children.

And do you deny that the mob charged the shooting policemen?

-- Was it after the shooting?

After the shooting, yes. -- They were running in different directions. (10)

"A White man was dragged from a West-Rand Board vehicle, beaten with stones, clubbed with sticks and left dead. He was later picked up by students and thrown into a rubbish-bin; some remarked: 'That is where he belongs.' "

Did you see that? -- I was going home when I saw a White man who had been killed, but this was far away from school.

What were your thoughts when you saw this dead man lying down there? Who did you deem to be responsible for it? (20)

-- I did not see who killed him, I was not present when he was killed.

And did you think that his death had anything to do with the uprisings on that particular day? -- Yes, I did think so.

Then you testified about the arrests that took place in Soweto, that when students would alight from their various means of transport, they would be arrested by the police. -- That is so.

For no reason whatsoever? -- I do not know of any reason why they were being arrested. (30)

Did you see such arrests taking place? -- Yes, I did.

So/...

So they were just taken from the trains or the buses and arrested. -- Immediately they alighted from these buses, the police would be standing there and they would be immediately taken to the vehicles.

Now these students were they going to their schools? -- Yes, children going to school.

In order to study in a calm and peaceful way. -- Well, I would not know whether they had gone to study but one thing is, they were on their way to school.

Then you testified about the events during the mid- (10)
city march, that was in September, 1976 and that shops were fired without any warning and your girlfriend got killed. -- No, I said the police ordered us to disperse and it was when we were dispersing, going in different directions, that the shots were fired.

Without any provocation of any kind. -- Nothing that I saw. Dr Buthelezi also came there, he addressed us. He said to us he had been to the police station and that the police told him they would not release the people whose release we are going to demand because these people had committed (20)
crimes such as murder.

And what was your reaction to that? -- Whilst Dr Buthelezi was addressing us, still on the platform, the police arrived. We were told to disperse immediately and teargas was shot.

But did you, when you listened to Dr Buthelezi's speech, did you then decide to drop your demands for the release of the students held by the police? -- I do not know what the others thought at that stage, but I had come to the conclusion that our going there was fruitless because this has been (30)
said by the police.

But/...

But did you still want the police to release these students?
-- We wanted some to be released because we had not seen them
commit murder.

So despite the fact that you learned some were suspects
in murder cases, you still demanded their release? -- We
wanted them released because we had not seen them committing
crimes they were alleged to have committed.

But do you know or you are supposed to know that people
who are charged with certain crimes, common law crimes such
as murder, culpable homicide, they are charged in court (10)
in a proper way. -- That is true.

Why didn't you let justice take its course in this parti-
cular instance where people were held for murder? -- One
person had been murdered. There was one reported murder at
the time and it was impossible for the students to believe that
all the other students who had been taken into custody, were
held responsible for that one reported man's murder.

But didn't you demand the release of all students held
by the police? -- We said we demanded the release of the
students. (20)

In other words all students held by the police. -- We
did not specify, we did not say we wanted the release of so
and so and so and so, we only said we wanted the release of
students.

Regardless of the fact th at some of them had committed
crimes or allegedly had committed crimes. -- As I have already
said we had not seen them commit the alleged crimes.

Then you testified about the events of the funeral. -- Yes.
And you say that Jim Xebe also attended this funeral
which was denied by him. -- He was there. He is denying (30)
what he knows.

And/...

And that this funeral was held at the Doornkop Cemetery.

-- Yes, it was at the Doornkop Cemetery.

Was this the funeral of Dumisane Mbata? -- No.

Whose funeral was it then? -- It was a boy, I think his surname was Mabilane.

And then you testified about the events at your school while you were busy studying the police came there. -- Yes, we were studying when the police came.

And without any reason or provocation they took the children from their classes, assaulted them and when they (10) ran away, they were shot in cold blood. -- Yes, that is what I am still saying.

Now, you say in your evidence-in-chief that while you were in Swaziland you read newspaper reports regarding a certain amnesty given by the Minister of Police. -- Yes.

That people who had left the country, that is South Africa, illegally could return without being punished for doing that. -- No, students.

Yes, and that was the sole reason for your return to South Africa. -- I gave two reasons. The first one was (20) that we were idling in Swaziland.

Yes, and the other one, this amnesty given by the Minister of Police. -- And the amnesty given by the Minister of Police.

Now, do you want to say that after you had witnessed all these police atrocities and brutalities that you were prepared to go on the word of the Minister of Police? -- He had given us the assurance, yes.

You read about it in the newspapers. -- Yes, and also heard this over the radio. (30)

But you had seen the way in which the police of this Minister/...

Minister had acted. -- Yes, I had seen it.

They tell people to disperse and then they shoot them while they are busy dispersing. -- Exactly, yes.

And they assault and shoot school children without any reason or provocation. -- Without any reason that I had seen.

And now you were all of a sudden prepared to accept the word of the Minister of this police. -- This assurance was given by the Minister of Justice.

Certainly he was the Minister of Police and you knew it. -- Yes, he had promised that he would stop the police from (10) doing this.

Now I have a report from the Rand Daily Mail here, the Rand Daily Mail of the 22nd November, 1976 and this report clearly indicates that this amnesty expired on this very day, the 22nd November, 1976. And if I may add, that was even before you first went to Swaziland according to your evidence. -- My evidence is, I read, the amnesty I read of was given in December, 1976 in Swaziland. And also heard of this in Swaziland over the radio.

Furthermore, this amnesty only pertained to people (20) who had left South Africa illegally. -- I said the report I read was by Mr Kruger, saying that all the students who had left South Africa should come back.

Well, I put it to you that this amnesty only pertains to students or people who had left South Africa illegally. -- That report did not specify students who had left illegally, but it said students who were in exile should come back.

And it did not pertain to people who had committed crimes before their departure. -- The report I read did not specify, it only said students who were in exile should (30) come back home.

But/...

But how did you know that you would be safe in South Africa because you had been sought for by the police before your departure, before your illegal crossing of the Swaziland border.-- But here was the Minister promising that none of those things would be repeated.

Do you still say that in view of your earlier experiences that you trusted the Minister that he would keep his word? -- Yes, he is the man in authority.

And you would return with complete impunity? -- Yes, if the Minister said so, I would. (10)

Now let us deal with the first trip to Swaziland and your relation with Jim Xebe. Who paid for this first trip? -- I do not know.

Didn't you pay? -- No, I did not.

Didn't Xebe pay? -- He did not.

Did you have any money with you in order to be able to pay? -- No, I did not.

Nor did Xebe as far as you knew at that stage. -- I do not know whether Xebe had any money with him.

You did not ask him whether he had? -- I did not. (20)

Now, certain questions were put during the course of his cross-examination by your Counsel which tended to show that he must have been a bad type of person. First of all he had disputes with his father concerning girls. -- Yes.

He had given a certain Zodwa a hiding with a sjambok. -- Yes.

He was involved in fights concerning girls. -- Yes.

And in such a fight he was stabbed in the face by one Bibisa. -- That is right.

He was involved in beating up and robbing a hostel inmate. -- Yes. (30)

And/...

And he also beat up his girlfriend Knotty. -- That is so. But nevertheless you associated with this bad type of person. -- He was a friend of mine.

And you went to great lengths in order to ensure his departure to Swaziland against the wishes of accused No. 2. -- Yes, he was a friend of mine.

You went to Swaziland for better education? -- Yes.

William Legodi? -- That is correct.

All the others on this first trip. -- That is so.

But your friend Jim Xebe, who also left on this first (10) trip, was a sort of an educational dropout because he only made standard 3. -- That is so.

Now what was he to do in Swaziland? -- Jim Xebe had been employed by an electrician and in Swaziland he could have gone to a school there, a trade school and further his knowledge in electricity.

BY THE COURT: Did he tell you that? -- No, that is what I thought. I had planned to encourage him to take up this course.

I just want to know what gave you the idea that he (20) was going to Swaziland to join a trade school and further his trade of electrician? Did he indicate to you that he would like to do that? -- I gained the impression he would be willing because he had been attending technical college where they learn this electricity trade.

All I want to know is did he indicate to you that he would like to go to Swaziland to continue his training as an electrician there? -- No, not to me. He did not say that to me.

Then what gives you the right to say that he was (30) going there for that purpose? -- No, I am not saying that. I say/...

say I would have encouraged him on his arrival in Swaziland to take up this course.

But you had not said a word to him, do I understand, about this before you left, when you discussed that you were going out for education? -- I did not discuss it.

Did you tell your Counsel this? -- Yes, I did.

MR ACKERMANN: Now, your evidence was that you went to Park Station where you found accused No. 7. -- That is so.

And you asked him as to the time of his departure and he said that he was still waiting for certain women to arrive. -- That is so. (10)

Then you returned to fetch your friend Jim Xebe. -- That is correct.

And he went along. -- That is so.

How did you know that he would be paid for, in other words that he could make use of this transport of No. 7? -- Jim Xebe had been working, he had money.

But you told me right now that you were not aware of any sum of money as far as he was concerned. -- What I knew was that he was a working man, but I did not know how much he had in his pockets then. (20)

And you also told me that you had not asked him whether he had money available for this transport. -- Yes, I did not ask.

So how did you know that he would be able to pay? -- He would have talked to the driver of the vehicle.

Did he talk to the driver? -- Not in my presence.

I put it to you that you are lying. -- Well, if you would be able to tell me the truth.

The truth is Xebe's evidence and you heard it here in court. -- There is no truth in Xebe's evidence. (30)

That/...

That both of you were going out for military training.

-- I did not go for military training.

Now in Swaziland you say you decided to return to South Africa in order to fetch some students. -- That is so.

Now, why was it necessary for you to get a person to accompany you on this venture? -- I was scared of crossing the border alone.

Scared of crossing the border alone? -- Yes.

What gave you that fear? -- In case anything happened to me along the way, then nobody would know what has happened (10) to me.

And why did you decide to take Xebe along? -- Because Xebe was a friend of mine, I have already said so.

You knew that you would run into accused No. 2, Ganya, or Dr Ntshuntsha. -- That he would meet Dr Ntshuntsha?

That you would on your return in South Africa run into accused No. 2, because accused No. 2 was involved in taking these students out to Swaziland. -- No, I had come to fetch friends of mine in the Republic.

Who would pay for their trip to Swaziland? -- We would (20) have seen that later when we arrived here.

Are you serious in giving that answer? -- Yes.

That they would board the taxi of accused No. 7 and Moloto and then you would see whether there would be any payment on your arrival in Swaziland? -- No, I did not say that.

What do you say then? -- I said that would have been decided on our arrival in the Republic, in South Africa.

In South Africa. Sorry, I misunderstood you. Now you were not able to go out without the assistance of accused No. 2. -- That is correct. (30)

And the obvious man to approach as far as the second trip/...

trip was concerned, was accused No. 2. -- I could have gone to accused No. 2 or Dr Ntshuntsha.

And both of them knew of the position of Jim Xebe. -- What position?

That he was not entitled, according to your evidence, that he was not entitled to go along on the first trip because he was not a student. -- No, but they did not know that Jim Xebe had gone.

But he was accompanying you back to South Africa. -- That is so. (10)

And he had to come back to Swaziland. -- That is so.

Now weren't you afraid that he would run into accused No. 2 or Dr Ntshuntsha? -- I decided that I was going to explain to them that I took Xebe along and for the reasons I have already given.

Why didn't you take William Legodi along? -- I was not used to William Legodi, he was not a friend of mine.

Now you say that the people you were to get here in South Africa were SSRC members. -- Yes, the people with whom we were sleeping outside in the veld. (20)

Now Jim Xebe was not a student, he had no contact with the SSRC. -- No, he had contact with me who was a member of the SSRC.

By the way, you told us in-chief that accused No. 2 and Ntshuntsha wanted to know whether Jim Xebe was a student or not. -- Yes, they did.

And you could not persuade accused No. 2 or Dr Ntshuntsha to let Xebe join you on this first trip. -- That is so.

And you had to take him along in a secret way. -- I did.

Why didn't you tell accused No. 2 or Ntshuntsha (30) about the possibility of Xebe going to a technical school

in Swaziland; that he in fact would further his education in Swaziland as far as technical education was concerned? -- I tried to persuade them in many ways that they should allow Jim Xebe to go along, but they refused.

But you did not make use of this reason? -- I did mention this.

Did you mention this? -- Yes, that was one of the reasons.

That Jim Xebe would go to a technical school in Swaziland? -- Yes, I remember mentioning this to accused No. 2.

And that was in the presence of Xebe? -- No, my (10) evidence was that Jim Xebe was coming at the back, coming behind us together with the girls and I was alone with accused No. 2 in front when I pleaded that Jim be allowed to go out.

But Xebe was with you when you talked to Dr Ntshuntsha in this regard. -- He was standing quite a distance away from us.

And did you mention this possibility of Xebe going for technical education to Dr Ntshuntsha? -- I do not remember whether I mentioned that to Dr Ntshuntsha.

I do not think that you did mention it to Dr Ntshuntsha or to accused No. 2. -- I did mention it to accused No. 2. (20) I do not remember whether I mentioned it to Dr Ntshuntsha because I had been pleading with him for some time and I had grown tired of pleading further.

You can remember other things that were said between you and Dr Ntshuntsha on that occasion. -- Not everything that I spoke to Dr Ntshuntsha.

But this possibility of Xebe's further education in Swaziland must have been the most important thing in your mind at that stage, because this was a disqualifying factor that he was not a student and you wanted your good friend to go (30) along. -- That is so.

And/...

And this would have been the first thing that you would have mentioned to Dr Ntshuntsha. -- As I say, I do not remember whether I said it or not.

Now, you had made through many hardships, if I may put it this way, together with the other SSRC people, that is before your first departure to Swaziland. -- Yes.

And you knew that these people wanted to go for further education. -- Which people?

The other SSRC members sleeping at the hill. -- Well, I knew that they wanted to further their education. (10)

But this must have been a common aspiration as far as you SSRC members were concerned, those running away from the police. -- That we wanted to further our education?

Yes. -- Yes, we wanted to.

Now why didn't you tell accused No. 2 before your first departure to Swaziland, why didn't you tell him then that there were other people as well wanting to go for further education?

-- On the day that Jebe took me to accused No. 2 to go and talk to him, I had been with the other students out in the veld and since I went alone to go and talk to accused No. (20) 2 they could have also done the same.

Did you ask accused No. 2 whether the others had approached him? -- That the other?

SSRC members had approached him. -- No, I did not ask him about members of the SSRC.

Why not? -- I wanted to go away immediately.

But what about your good friends, your fellow SSRC members who also wanted to go for further education? -- I was not used to accused No. 2 then and I do not think it would have been proper for me to ask him questions as to whether (30) other people had been to see him.

But/...

But nevertheless whether you were used to him or not, you had the audacity to approach him in connection with Jim Xebe's position. -- Jim Xebe was a close friend of mine and he is a person I wanted to go along with then.

And you had enough courage to mislead accused No. 2 in order to get Jim Xebe away. -- Misled him in what way?

In taking him secretly along on this trip organised and apparently sponsored by accused No. 2, without his permission. -- He did not want me to take Jim along.

But you still say that you did not think of it to (10)
take your fellow SSRC members along on this first trip ..
(intervenes) .. -- On the day accused No. 2 said we are leaving,
the other members of the SSRC were not present. The person
present was Jim Xebe, the person I wanted to go along.

A certain message was conveyed to Joe Makwanazi in Swaziland in the form of a letter.

BY THE COURT: On the first trip with Jim how many of you went into Swaziland? -- We were five. Me, Jim, Legodi, Keith and Jane.

No more? -- Just the five of us. (20)

Did you tell your Counsel that? -- Yes, I did.

MR ACKERMANN: Now this message that was carried along in the form of a letter on this first trip to Swaziland. -- Yes, it was.

And it was from Ganya and Dr Ntshuntsha to Joe Makwanazi? -- I said the letter was given to me by Ntshuntsha. And that this letter was to be given to the person whose name appeared on the envelope.

And did you ever find out what the contents of this letter was? -- Yes, I did. (30)

How did you find out? -- It was in my presence, in our presence/...

presence that the letter was opened by Joe and read by him.

And what did he read out? -- He read the letter himself. When he was through, he said the doctor wanted some money.

And what impression did you gain from this message you had taken to Makwanazi? -- Nothing. I was only asked to hand that letter over.

Yes, but did you get the impression that these people were working together, Ganya, Ntshuntsha and Makwanazi? -- No, how did Ganya feature there because I said the letter was given to me by the doctor for Makwanazi. (10)

You know that he worked together with Ntshuntsha. -- Yes, but then he did not give me a letter. The letter was given by Ntshuntsha.

Nevertheless you got the impression that there was a close connection between Makwanazi and Ntshuntsha. -- I did not see any connection there, excepting that I took a letter from one to the other.

And a fairly large sum of money was sent by Makwanazi to Ntshuntsha.-- Yes.

Now did you find out what Makwanazi was doing in Swaziland, what his position was? -- Yes, I came to hear of that. (20)

That? -- That he is the manager of the Coca-Cola Company.

What did this have to do with the refugees' position in Swaziland? -- I do not know, but one thing is he usually came with the Swaziland officials to the camp, the refugee camp.

Did you ever ask anybody? -- No, I did not.

Why not? -- Ask why Makwanazi was there?

Yes, as the manager of the Coca-Cola Factory dealing with refugees from South Africa. -- Well, I did not know what connection/... (30)

connection he had with the Swaziland officials.

Now to deal with the proposed second trip. You say that one vehicle diverted to Benoni. -- Yes.

As a security measure, you said. -- That was what was being done.

Whose idea was this that you should meet at Benoni? -- Accused No. 2, together with Dr Ntshuntsha went to talk to Moloto and when they came back they told us that we would be driving through Benoni.

Where was accused No. 7 at that stage when that (10) discussion took place? -- I am speaking under correction, but I think at that stage he had already driven off in his Combi.

And you say that on this trip Lindane Xaba was supposed to go along? -- Not supposed to, he went along.

He went along with the other vehicle? -- In the Combi.

Then you waited for a week until the next trip to Swaziland.

BY THE COURT: Is that John Xaba? -- Yes.

He is also called Lindane. -- He is also known as Lindane.

Did he go on that second trip? -- Yes, he did. (20)

Am I right in saying that Jim called him John Xaba first of all, this is in evidence?-- He referred to him by both names.

That is right. It is the same person though, John and Lindane. -- The same person.

Now you can correct me. Jim said, I think, that you and he - that Dr Ntshuntsha came to see you and Jim and then you and Jim went to fetch John Xaba or Lindane. -- Yes, this is what Jim said.

Is that correct? -- No, it is not correct. (30)

And then he said that you found Lindane, that you had

a conversation with him and then you went back I think and waited for Dr Ntshuntsha. -- We had been to Dr Ntshuntsha the day before Lindane came to me.

So what Jim says is incorrect. -- What Jim says is incorrect.

Did you tell your Counsel that? -- I did, yes.

MR ACKERMANN: And you said that you waited for a week until you took this next trip to Swaziland. -- We left on a Friday.

So that was the same week of this abortive trip. -- Yes, if I am not mistaken, it was in the same week. (10)

Did you have any contact with either Dr Ntshuntsha or accused No. 2 during this week? -- When we took Lindane along, yes, I had contact with Dr Ntshuntsha.

BY THE COURT: Sorry, can you just explain, Mr Ackermann, when you talk about the abortive trip, do you mean that that is the one where they went to Benoni?

MR ACKERMANN: Benoni. -- Yes.

BY THE COURT: Well, what I would like to know though is, did Lindane actually go in the Combi then? Did he arrive, get to Swaziland, John Xaba or Lindane? -- Yes, he left in the (20) Combi and did arrive in Swaziland.

He is one of them that - on that trip he was in the Combi and he got to Swaziland, did he? -- That is correct.

But you and Jim and some others were in the group that went to Benoni. -- That is so.

And that group then had to come back, it did not get any further. -- That is so.

MR ACKERMANN: You say that you had contact with Dr Ntshuntsha when you took along Lindane Xaba. -- Yes, accused No. 2.

But this was before this trip that you had intended (30) to undertake on the Monday. -- Yes, I had contact the day before the/...

the Monday on which we had to leave and again I met them on the Monday on which we were to go.

Yes, but then you went to Benoni. -- Yes.

And you did not manage to get to Swaziland. -- Yes.

This was on the Monday. -- It was either a Monday or a Wednesday, I am not very certain.

Now the Friday of that very same week you departed, according to your evidence, together with Matsoge and the others to Swaziland. -- That is so.

Now what I want to know, did you have any contact (10) with either Dr Ntshuntsha or accused No. 2 between the period between the Benoni affair and your departure on Friday? -- The Friday on which we left, yes.

Did he come to you or did you go to accused No. 2? -- They came to me.

And did they tell you that there were other people who also wanted to leave? -- Accused No. 2 came first, this was before Dr Ntshuntsha arrived. He said, this is accused No. 2, that Dr Ntshuntsha had gone to arrange transport, that he would be coming. (20)

But didn't you inform accused No. 2 or Dr Ntshuntsha of this failure at Benoni? -- They were there.

Were they in the vehicle at Benoni when you missed the other vehicles? -- Yes, they were present.

And did you then come to an arrangement as to the next trip? -- No arrangement was made then. They dropped us just along the way.

Now to deal with accused No. 2. Do you know he managed to make a living? In other words whether he had any employment or profession? -- I did not ask him. (30)

Nobody else told you? -- Nobody did.

And/...

And did he ever instruct you to guide people across the border to Swaziland? -- No.

Did you know whether he had been attached to the PAC?
-- I did not know.

Or whether he had spent some time on Robben Island? -- I did not know that.

And you say that one of the reasons for your return, your final return to South Africa was the unsatisfactory state of affairs in Swaziland; that people were idling and were doing nothing. -- Yes, that was the reason. (10)

Now, did you tell accused No. 2 of this state of affairs after you had returned from Swaziland? -- Yes, I think it was after three weeks. It was the day we met and when he questioned me about the money that he asked me why I had come back and I told him.

And what was his reaction? -- Well, he only reprimanded me, because he is always that kind of a person. He said I was just playing about with them when I wanted to go to Swaziland.

Let us have more details. You say he reprimanded you.
-- Yes. (20)

Exactly what did you tell him? -- I told him that we were just walking up and down the streets in Swaziland, we were idling and we were doing nothing. I further told him that what I had heard on the radio and what I had read in the paper that I then decided to come back.

Yes? -- He then told me he had been to Park Station and that he met Moloto at the station, that Moloto had given me money to take to the wife of Dr Ntshuntsha. He asked me where that money was. I told him that I had taken the money. Again he rebuked me and said this was supposed to have been done (3) by a grownup.

Did he say that you were just playing around in giving this explanation as to why you had returned from Swaziland? -- No, that. He said he was of the opinion that my asking him to take me along was playing about with them because firstly he did not know why I had come back in the first instance from Swaziland.

Did you tell him that you had been informed in Swaziland that the schools would only open in September, 1977? -- Yes, I explained that to him. I said after hearing the schools would only be opening in September, I got tired of idling (10) in Swaziland because I realised I would have to be idling the whole time.

And what did he have to say about these schools? -- He said nothing about schools, he reprimanded me about coming back.

Now you say that these activities involving you going to and from Swaziland, terminated before the 16th December, 1976? -- Yes.

And that you had this discussion with accused No. 2 before the 16th December, 1976? -- No, I said after about (20) three weeks. Three weeks after I had come from Swaziland. I do not know what the date is.

Now, this discussion regarding the position of Dr Ntshuntsha, was it before or after the 16th when you had this fight with the other youngsters? -- It was long thereafter. I said it was after 3 weeks, it was between 3 and 4 weeks that I had come back from Swaziland, that I met accused No. 2.

Was it still in December? -- I do not know. It could have been in January.

BY THE COURT: What are we talking about now? (30)

MR ACKERMANN: M'Lord, this discussion with accused No. 2 regarding/...

regarding the money for Dr Ntshuntsha's wife. Now, as far as accused No. 7 is concerned, you say that you conversed with him on this first occasion when you first left for Swaziland. -- I asked him when he would be leaving.

And he replied.

BY THE COURT: Is that when you - is that the time that you - you mean that is when he said he has got to wait for some other passengers? -- That is so.

And is that when you went back to fetch Jim? -- That is the time. (10)

MR ACKERMANN: What language did you make use of? -- I was speaking a mixture of Swazi and Zulu.

So you were understanding each other. -- Well, I took it he understood me because he gave me an answer.

Did you have any discussion with him .. (intervenes)

BY THE COURT: Did you ask him to wait for you? -- I asked him when they would be leaving. He said to me they were still waiting for some women getting to Swaziland who were still at work and I understood him to mean later.

MR ACKERMANN: Did you have any discussion with him during (20) one of these trips to and from Swaziland? -- Inside the car?

Yes. -- No, I do not remember speaking to Ntshali-Tshali. He used to play music tapes there and we listened to the tapes and we would discuss amongst ourselves but not with him.

Now you had a discussion with Moloto regarding the position of Ntshuntsha. -- Yes, at the time about Ntshuntsha we did.

And was accused No. 7 present at that stage? -- No, he was not present.

Are you able to say whether he was aware of the fact (30) that Dr Ntshuntsha had been arrested? -- I do not know. I did not/...

not discuss this with him.

Now it is so that the State witness Morgan Matsoge's evidence was not disputed on your behalf. -- That is correct.

Your evidence is that after he had gone along to Swaziland, you returned together with Xebe. -- After whose departure to Swaziland?

Morgan Matsoge's departure. -- We came back with Morgan.

So Morgan did come back? -- Yes, he did.

Together with you and Xebe? -- Yes.

And what was the reason for his return to South Africa? -- He did not give me his reasons for coming back. (10)
There were many others who came back who did not give reasons for coming back.

But what was the general feeling amongst the students coming back? Were they also coming back for the same reason as you had come? -- Well, they did not give their reasons for coming back, they did not say why they were coming back.

Did they also - or was there any discussion pertaining to this amnesty by the Minister of Police? -- Well, everybody who was at the camp at the time of the news would hear what (20)
the radio said because it is in the camp.

And then all of a sudden there was this outflow of students back to South Africa? -- Yes, they did come back.

And what impression did you have as to Matsoge's return to South Africa? -- I think he came back because of what he heard over the radio or what was read in the papers.

In other words for the same reason. -- That is what I think. I cannot say it is so.

Yes, but that was your impression at that stage. -- That is the impression I had. (30)

Did you tell your Counsel that that was your impression?

-- No, Counsel did not ask me this question. I am giving the reason because you are asking me the reasons.

Now, Matsoge and Kau testified that their going to Swaziland or Matsoge's going to Swaziland had something to do with military training. -- That I do not know.

So you are not able to dispute that Matsoge's departure for Swaziland and his presence in Swaziland for some time had something to do with military training? -- When we were in Swaziland a Mr MacNamara came to us there and he spoke about schooling. No mention was made of military training. (10)

BY THE COURT: Just tell me something. Morgan, was he at that party that was held that Makwanazi invited you to? -- Yes, I think he was there.

Well, I think he said so. I think he testified that thereafter, just after the party, Makwanazi spoke to you and him and the question of money was raised and he said you must tell them back in South Africa that I haven't even got money for myself. Now is that so? -- I do remember that Makwanazi was present at the party, but what was discussed between .. (intervenes) (20)

Please listen carefully. I have the impression and your Counsel will tell me if I am wrong, that Morgan said after the party Makwanazi spoke to you and Morgan and there you or Morgan asked for money for No. 2 and Makwanazi said to you both: I haven't got money yet, it has not arrived from Tanzania, I haven't even got money for myself. -- Yes, I heard Morgan say this.

Now is that correct? Is that the truth what Morgan said? -- What I say is this did not come from me, it was not me who was saying this to Makwanazi .. (intervenes) (30)

Well, is Morgan then telling a lie when he says you were/...

were present and that Makwanazi spoke to you and Morgan about this? -- I did not say it. If Morgan said this to Makwanazi and this was a reply to him from Makwanazi, then I cannot deny that, but I did not say that.

I want to know whether this conversation that Morgan testified about took place in your presence. -- I do not remember that.

Did you tell your Counsel this? -- That I do not remember?

Yes. -- Yes, I did. I said to my Counsel I do not remember everything that was discussed there. (10)

But now surely if this had been said, this was completely the opposite to anything of your intention to going there to Swaziland, surely you would remember if that had been said. -- What I say is I never discussed this with Makwanazi but if this was discussed by Morgan and Makwanazi and was not said by me, I do not remember. That I cannot deny it was discussed.

MR ACKERMANN: Now I want to put it to you again that Matsoge testified that his presence in Swaziland and his departure for Swaziland had to do with military training. -- That is what he says. (20)

Now is this possible? -- What Matsoge told me when he arrived at home, was that he was running away from the police in South Africa and that he was a student. No military training was discussed.

Did he then tell you the reason for going to Swaziland? -- Yes, he had said he wanted to further his education.

Did you tell your Counsel this? -- I did.

I want to read to you a certain passage from Jim Xebe's evidence-in-chief. The reference is Volume 58, page 2 348 as from line 21: (30)

"Two weeks went by without my seeing

Ganya/...

Ganya. He came there. He had come to tell us that Dr Ntshuntsha had been arrested."

-- I heard him say that.

Is this correct? -- No, I am the person who told Jim Xebe that Dr Ntshuntsha had been arrested and that he had died in detention.

Then he proceeded: He was asked:

"What do you mean by us? -- Myself and Michael. I then said to Michael: Michael, you see now this job is no good, we will also get arrested. The best is for us to leave."

(10)

Is this true? -- I was not working. He did not say this and I was not working.

So this is absolutely false. -- What he said there is not the truth because I was not working.

"Michael agreed. He said: Yes, you are right."

Did you say that? -- No, this discussion did not take place. I am the person who told him that Dr Ntshuntsha had died. (20)

"After three days rather after three weeks Michael came to me, he had with him a newspaper. He showed me a story there and said: You see, Dr Ntshuntsha is late, he has died."

-- That I went to tell him Dr Ntshuntsha had died is the truth.

"I again drew Michael's attention to this. I said: Michael, you see this job is no good. Michael left me and

(30)

went/...

went to his parents' place."

-- He is lying if he says so, because I was not working.

Now did you tell your Counsel that?

BY THE COURT: Did you tell Counsel that was all lies? -- Yes, I told my Counsel that what Jim says here is not the truth, that he had been working is not the truth; that I am the person who told him about the arrest and the death of Dr Ntshuntsha.

THE COURT ADJOURNS FOR TEA. THE COURT RESUMES.

MR PITMAN ADDRESSES THE COURT - not into the microphone (10)

THE COURT ADJOURNS.

THE COURT RESUMES ON THE 5th MARCH, 1979.

BY THE COURT: Mr Wilson, apropos my notes which ..(inaudible) . correct and I think this was on Friday where you pointed out to me some things were incorrect in my notes, this was in relation to Jim's evidence.

MR WILSON: About the money being given to Dr Ntshuntsha.

BY THE COURT: Yes. Now, what I would like to do please, so that I have clarity because my notes could be wrong, I just want to go through that particular, what I might call episode and ask you exactly what in fact is put in dispute and (10 where. Let me just find the place. Now, I am reading, you have your volume, this is Volume 58. Do you have it there?

MR WILSON: Yes, M'Lord.

BY THE COURT: Now if you look at page 2 340, line 13, it starts 'MR ACKERMANN'. Now, it starts with what one could call this episode:

"Yes, I did."

That is after he had been asked if he saw Ganyz.

"I was at home at my parents' home, still asleep in the morning, when Michael, (20 accompanied by Ganya came along."

Now just pausing there. Can you show me in your cross-examination where that was put in dispute if it was? I can help you by referring to the page where you actually now dealt on one occasion with, perhaps it refers to this incident, I do not know, that was the page you referred me to, 2 362, but now that does not take it any further. But there is no place as far as I can see and that is why I want to make quite clear on my notes where what I have just read was put in dispute.

MR WILSON: No, it was not specifically put to him that (30 he did not see Ganya. What was put to him was that the money was/...

was handed over to Dr Ntshuntsha.

BY THE COURT: Yes, now I just - let us just go along there. Am I correct therefore in saying that nowhere in the cross-examination on behalf of No. 6 was this statement put in dispute that:

"I was at home at my parents' home, still asleep in the morning, when Michael, accompanied by Ganya came along."

MR WILSON: No, M'Lord.

(10)

BY THE COURT: Then:

"Ganya asked us how the journey to Swaziland was. We reported to him.."

That also was not disputed.

MR WILSON: Not disputed.

BY THE COURT: "We reported to him that we have received an amount of R200 in Swaziland which money we were instructed to hand over to him. Michael produced the R200 which he handed over to Ganya."

(20)

Now that you say, we will come back then to page 2 362 later, that is the passage you referred to where you say it is put in dispute.

MR WILSON: Yes.

BY THE COURT: Then:

"Ganya said it was O.K., he would see us some other time. Ganya left us there."

Now that was not put in dispute.

MR WILSON: No.

BY THE COURT: "After Ganya's departure, whilst we were still at my parents' home,

(30)

Dr Ntshuntsha came."

Now can you show me any place where that was put in dispute by you on behalf of No. 6?

MR WILSON: No, M'Lord.

BY THE COURT: It was not.

MR WILSON: What was put, was saying that the money was handed to Dr Ntshuntsha.

BY THE COURT: No, but what I mean is that that was not put in dispute.

MR WILSON: Not directly, no. (10)

BY THE COURT: Well, is it anywhere indirectly put in dispute?

MR WILSON: Well when we say, it was put to him that the money was in fact handed to Dr Ntshuntsha, it disputes his version that Dr Ntshuntsha was merely told the R200 had been brought back.

BY THE COURT: What I mean is that there was no dispute, it was not put in dispute that:

"After Ganya's departure, whilst we were still at my parents' home, Dr Ntshuntsha came."

(20)

MR WILSON: No, M'Lord.

BY THE COURT: Right, that was not disputed.

"He also asked us how the journey was to Swaziland. We reported to him that an amount of R200 was received by us in Swaziland and that money had already been handed over to Ganya."

Now we will come back, that you say is covered by 2 362.

MR WILSON: Yes, M'Lord.

BY THE COURT: Well, we will come back to that. (30)

"Dr Ntshuntsha then told us that on that day/...

day there were children who were leaving."

I could not find anywhere where that was put in dispute.

MR WILSON: No, M'Lord.

BY THE COURT: "Michael told him that we can unfortunately not go on that day because we had just arrived."

Again, can you show me anywhere where that is put in dispute?

MR WILSON: No, M'Lord.

BY THE COURT: It was not, in other words.

MR WILSON: No, M'Lord. (10)

BY THE COURT: "Michael also said that he had also got a boy who was interested in leaving, that that boy was also interested in undergoing training."

Now, is there any place where that was put in dispute?

MR WILSON: No, M'Lord.

BY THE COURT: "Dr Ntshuntsha then said we should fetch that boy so that when he comes he should find him with us and that we will have to accompany these children up to Johannesburg Station, Park Station." (20)

Was there any place in your cross-examination on behalf where that was put in dispute?

MR WILSON: No, M'Lord.

BY THE COURT: "Dr Ntshuntsha left us there."

Is there any place where that was put in dispute?

MR WILSON: No, M'Lord.

BY THE COURT: "Me and Michael left to go and fetch Michael's boy."

Is that any place where that was put in dispute? (30)

MR WILSON: I do not think so, M'Lord. I speak subject to/...

to correction there.

BY THE COURT: Well that was my impression too because I got the volumes after what you told me on Friday and I couldn't find anywhere where that was put in dispute. Then:

"We arrived at this boy's home."

I could not find anywhere where that was put in dispute. Am I correct?

MR WILSON: Yes, M'Lord.

BY THE COURT: "It so happened that it was a boy I knew. His name was John Xaba .."

(10)

MR WILSON: Lindane.

BY THE COURT: Lindane, that is what I asked No. 6, your client - the same person. I could find nowhere where that was put in dispute.

MR WILSON: No, M'Lord.

BY THE COURT: "I heard Michael talking with this boy."

I could not find anywhere where that was put in dispute.

MR WILSON: Yes, M'Lord.

BY THE COURT: Am I correct?

(20)

MR WILSON: Yes, M'Lord.

BY THE COURT: "Lindane was saying that he was very much interested in going for training."

Now that I think you will say - I think the passage that you will say that that was put in dispute was page 2 363. Is that correct?

MR WILSON: Yes, M'Lord.

BY THE COURT: Line 10:

"I suggest to you that Michael never told you that Lindane was interested in undergoing training, nor did Lindane ever say that he was."

(30)

-- We had this discussion ..."

Then you asked him:

"Did you take any part in this discussion? -- No."

But leave that for the moment.

"We came back with Lindane and in the street not far away from my home we went to sit down, waiting for Dr Ntshuntsha."

As far as I know that was not put in dispute.

MR WILSON: No, M'Lord.

(10)

BY THE COURT: "The Ford Cortina driven by Dr Ntshuntsha came along , followed by a van."

I could find no place where that was put in dispute.

MR WILSON: No, M'Lord.

BY THE COURT: It was not.

MR WILSON: It was not disputed that this incident took place.

BY THE COURT: I am just trying to find out exactly, you see, this may have caused me some - because these matters were not in dispute, I was trying to find out why my notes were incorrect. This is the point. That is why I wanted to go over the whole of this. (20)

"And inside Dr Ntshuntsha's vehicle were school children and .."

No, sorry:

"The Ford Cortina driven by Dr Ntshuntsha came along, followed by a van."

Now that was not put in dispute.

MR WILSON: No, M'Lord.

BY THE COURT: "And inside Dr Ntshuntsha's vehicle were school children and also (30)

in/...

in the van were school children."

That, so far as I know, was not put in dispute.

MR WILSON: No, M'Lord.

BY THE COURT: "Ganya was in the cab in the front of the van. Dr Ntshuntsha told me, Michael and John to go into the van, the back of the van."

That was not put in dispute.

MR WILSON: No, M'Lord.

BY THE COURT: "We did so, the three of us (10) went into the van at the back. We proceeded to Park Station."

That episode then at that particular spot, because then they got to Park Station.

MR WILSON: Yes, M'Lord.

BY THE COURT: Now that was not put in dispute.

MR WILSON: No, M'Lord.

BY THE COURT: Then let me just turn now to your page 2 362 to which you had referred me. You then asked him:

"And that he produced R200 of which (20) R100 was given to you and R100 to Michael. -- No, the whole R200 was handed over to Michael."

MR WILSON: Yes, M'Lord.

BY THE COURT: Now:

"And I suggest to you that you took R100 across the border and when you got back to your place in Johannesburg, you then handed it over to Michael. -- No, the whole R200 was in Michael's possession." (30)

Then:

"And/...

"And that this money was later given to Dr Ntshuntsha. -- No, it was handed over to Ganya."

Now, what I wanted just to find out from you, to make it quite clear, is do you say that the word "And that this money" is part of the original sentence as it were:

"And I suggest to you that this money was later given .."

MR WILSON: Yes, M'Lord.

BY THE COURT: Is that the point? (10)

MR WILSON: Yes, M'Lord.

BY THE COURT: The 'and' is, what happened really, as we have it sometimes, is that the Interpreter interpreted your first sentence or rather the first part of it from say line 10 to 12 and then before you had really completed, the answer came.

MR WILSON: Yes, M'Lord.

BY THE COURT: And you went on: "And that this money .."

MR WILSON: Yes, M'Lord, it was one transaction.

BY THE COURT: One transaction - "And I suggest", in other words that the word should be "And I suggest that this (20) money was later given to Dr Ntshuntsha."

MR WILSON: Yes, M'Lord.

BY THE COURT: Because you have used the words 'I suggest' above, you said in line 10 and the word 'And' you intended to, as it were, complete the sentence.

MR WILSON: That is so.

BY THE COURT: Now, finally, have you used, throughout this case the word 'suggest' as synonymous with 'put'?

MR WILSON: Yes, M'Lord.

BY THE COURT: You have? (30)

MR WILSON: Yes, M'Lord. There are one or two places where/...

where obviously it is where I am putting a contradiction to them where I say: 'I suggest to you you are lying' or something of that nature, but in the main I have used 'suggest' as 'put'.

BY THE COURT: Well you see, this is what - this is why my notes, apart from what I have just discussed before about the whole transaction not being disputed really, my notes - you see I had an impression that fairly on in the case you had used the word 'suggest' and I had said to you are you putting it to the witness. (10)

MR WILSON: And I said yes.

BY THE COURT: No, you said no on that particular occasion.

MR WILSON: Oh, I found another passage where I said yes.

BY THE COURT: No, that is alright, but what I want to know, you see, because my impression was and there of course you can correct me during argument, we will leave it at that, my impression was that you had used 'suggest' not as synonymous (and Mr Pitman as well) with 'put'.

MR WILSON: With respect, M'Lord, my intention was in, I can say almost 100%, to mean it as 'put'. There are one or (20) two passages where 'suggest' was used in another sense but normally it is as 'put'. If Your Lordship looks at the top of that page, for example, there is another 'suggest' there.

BY THE COURT: Well, you see, one has to be - that may have led to my note which I was a bit worried about because I put something - I asked rather you or your client something that was not correct, but this may have - you say that you have substantially used the word 'suggest' as synonymous with 'put'.

MR WILSON: Yes, M'Lord. Where I put to the witness I suggest something happened in almost instance that is 'put'. (30)

BY THE COURT: Where you have used the word 'I suggest' you have/...

have used it as synonymous with 'I put to you'.

MR WILSON: Yes, M'Lord.

BY THE COURT: Throughout the case?

MR WILSON: There may be one or two isolated incidents but my recollection is that that is the position. The intention was, there may be, as I say I do not want to say that every time I use the word 'suggest' it means that, but in the main when I in cross-examination say to a witness 'I suggest to you this' that is 'I am putting it'.

BY THE COURT: Yes, I accept what you tell me, but what (10)
does worry me is that you see because it caused some confusion in my mind... (intervenes)

MR WILSON: I apologise, M'Lord.

BY THE COURT: .. wrong note because I talked with you because you have used the word 'put' as well.

MR WILSON: I have on occasions, yes.

BY THE COURT: Yes, and what - not that it is at this stage all that important, but it appeared to me that you were drawing a distinction between 'suggest' and 'put'.

MR WILSON: That was not intended. If Your Lordship for (20)
example will look at page 2 365 at line 22.

BY THE COURT: Yes, "I suggest to you"

MR WILSON: "that none of this happened".

BY THE COURT: Well you see, what always perturbed me about that was that .. (intervenes)

MR WILSON: And then at the bottom of the page:

"I put it to you that nothing .."

BY THE COURT: Well, that is what perturbed me that you have -
and as Senior Counsel I expect obviously that you pick your words with care and I assume you do. You say there: (30)

"I suggest to you that none of this
happened/...

happened.."

whereas the bottom you say:

"I put it.."

Now it appears to me here that what you - you were using the word 'suggest' because what you were relying upon as is clear in another part of your cross-examination is not so much what your client told you, but upon what Sammy or rather Morgan and Sammy said. In fact you say so. You say 'because' and I must confess that I was firmly under the impression that you had used 'suggest' there because it was something (10) as opposed to where you put something at the bottom, where that came directly of course from you in the sense that it was your client's instruction, whereas this 'I suggest' was somewhat weaker because you had got it from Morgan and Sammy.

MR WILSON: That has happened - my intention was to use it as synonymous with 'put'.

BY THE COURT: It makes it very difficult for me, doesn't it?

MR WILSON: I had not appreciated it, M'Lord, but the change in using both of them has caused this confusion.

BY THE COURT: Well it does, you see, because you know I (20) have to take - I mean I take Counsel as I find them, I take senior experienced Counsel as I find them and when I find that in specific cases where 'put' is used then I can understand because of the context that that would be something on instruction whereas - may I just show you what I mean by that at page 2 364. You will see there towards the bottom:

"Because you see ..."

"Ephraim and Patrick and Morgan."

You are now asking him a question. You see that near the bottom? (30)

MR WILSON: Yes, M'Lord.

BY THE COURT: "Ephraim and Patrick and Morgan.

And didn't Ganya come along alone after that?"

You see, that is a question.

MR WILSON: Yes.

BY THE COURT: He says:

"No, they came together."

Then you say:

"Because you see Morgan has given evidence to this court ..."

(10)

A, B and C.

MR WILSON: Yes, M'Lord.

BY THE COURT: And:

"He remembers coming to your house ..."

You see that?

MR WILSON: Yes, M'Lord.

BY THE COURT: Now that was also, you will find, tied up with this question of when then - whether, you know, I think No. 6 and Ntshuntsha went off again. Do you remember?

MR WILSON: Yes, M'Lord.

(20)

BY THE COURT: Now therefore, to me when you had referred to this evidence of Morgan and Kau, then you came back here:

"I suggest to you .."

Now this is concerning, you know, whether there was a little trip or something like that -

"that none of this happened."

It appears to be perfectly clear that what you were doing there was not so much on your client - obviously on your client's instructions but upon what Morgan and Sammy had said about the incident. That appears to be .. (intervenes) ..

(30)

when you use thereafter this about Michael, there was nothing said/...

said to Michael about it, you put it then because that is obviously something that Michael only was concerned with.

MR WILSON: Yes, I think Your Lordship will find that wherever I have used 'suggest' in that sense it is then when it is entirely consistent with my instructions that I suggest and some other witness. It is where I could have used 'suggest' or 'put', but where it is consistent with what I have been told.

BY THE COURT: Well that I cannot go into of course because your client's instructions to you are privileged in any (10) event, but I only say, we will take this matter up further obviously at the argument stage, but you can understand perhaps why, if you see that we went through the whole episode, you know, of this when they came back and these two people - nothing was disputed but then when I saw in my notes the word obviously 'suggest' or something that R200 was given to Ntshuntsha, the word 'suggest' there did not appear to me that you were putting it. You can understand now .. (intervenes)

MR WILSON: Yes, I appreciate .. (intervenes) (20)

BY THE COURT: .. the context of everything had not been admitted but because there appeared to me clearly that you were drawing a distinction between the two: a 'put' and a 'suggest'. But that we can clear up. The point is that here you say in any event, I will just correct my notes there, that on that page 2 362 firstly the word "And that this money" was later handed to Dr Ntshuntsha, is qualified and follows really the words 'I suggest'.

MR WILSON: Yes, it is part and parcel of the same suggestion.

BY THE COURT: And that there the word 'suggest' is used (30) synonymous with 'put'.

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