

AFFIDAVIT

I, the undersigned;

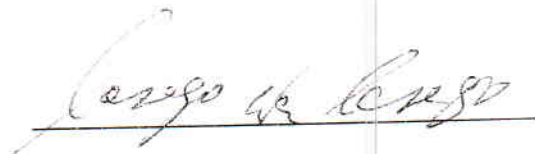
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do hereby make oath and say;

1. I am an adult male businessman and a qualified attorney. I am presently not in practice.
2. I reside at No. [REDACTED]
3. The facts contained in this affidavit are within my personal knowledge and belief and are both true and correct.
4. On 04 September 2012, I met with Mike Stainbank who questioned me about my position as a Director and/or Member and/or Subscriber in a Section 21 Company incorporated under the name The South African Apartheid Museum at Freedom Park, Registration Number: 2001/019108/8.
5. I told him that I was never a Director in a Section 21 Company incorporated or to be incorporated under the name The South African Apartheid Museum at Freedom Park, Registration Number: 2001/019108/8.
6. He asked whether I was ever a Member or a Subscriber. I told him that I was never a Member or a Subscriber in a Section 21 Company incorporated or to be incorporated under the name The South African Apartheid Museum at Freedom Park, Registration Number: 2001/019108/8.

7. He then produced a file, showing on the first page, marked by hand "**CA AF1**" an explanation about the file having been secured through the assistance of the Public Protector.
8. The next page marked by hand "**CA AF2a**" turned out to be a Special Power of Attorney consent form. My name was included on this page, among the names of Solly Krok, Sidney Abramowitch, Steven Joffe, Christopher Kroese, Kim Feinberg, Richard Moloko and Christopher Till.
9. The next page is marked "**CA AF2b**" This showed signatures above names, signifying that the seven persons mentioned above had appended their signatures to the names.
10. Above my name is a signature purporting to show that I too signed this second page "**CA AF2b**" of the Special Power of Attorney form giving my consent to the incorporation of the Company to be known as The South African Apartheid Museum at Freedom Park.
11. I read the CM29 form; the Contents of register of Directors, Auditors and Officers, marked by hand "**CA AF3a**" I particularly read the section attested to by Sidney Abramowitch, in which he says that he has my written consent on a CM27 form.
12. I have never given Sidney Abramowitch or anybody else my Special Power of Attorney to incorporate a Section 21 under the name The South African Apartheid Museum at Freedom Park.
13. Mike Stainbank told me that Richard Moloko had sworn under oath that the said Section 21 Company was initiated by Abramowitch and Solomon Krok.
14. I was never asked by either Abramowitch or Solomon Krok to become a Member, Subscriber or a Director of a Section 21 Company incorporated, or to be incorporated as The South African Apartheid Museum at Freedom Park.


15. I was never asked by Sidney Abramowitch to become a Member, Subscriber or a Director of a Section 21 Company to be incorporated as The South African Apartheid Museum at Freedom Park.
16. I deny that I placed my signature on that page which, by way of a handwritten insertion, shows that it was signed in Johannesburg on 08 August 2001 **(CA AF2b)**
17. By way of background, I can confirm that I was employed as a Consultant to Akani Egoli (Pty) Ltd, in the period 1999 to 2001 and I assisted in developing the concept for a project called Freedom Park.
18. Freedom Park formed part of the Akani Egoli bid for the Gold Reef City Casino Licence and that we had a deadline to complete it.
19. I explained to Mike Stainbank, that, as a consultant to Akani Egoli (Pty) Ltd, I worked closely with, among others, Sydney Abramowitch and Christopher Kroese, John Kani, Kim Feinberg on the Freedom Park project.
20. Around about mid 1999, we were at the offices of Christopher Kroese in Melville when Solly Krok arrived with an instruction that we immediately scrap everything concerning Freedom Park because he suddenly wanted this to be The Apartheid Museum.
21. We were fairly advanced in our work with Freedom Park and many, including Ms Claude Grundmann were livid about the sudden, unexplained change.
22. I confirm that everything, said to Mike Stainbank as with everything else contained in this affidavit is, to the best of my personal knowledge, both true and correct.



DEPONENT

I CERTIFY THAT the deponent has acknowledged that he knows and understands the contents of this Founding Affidavit which was SIGNED and SWORN TO at JOHANNESBURG BEFORE ME this 05th day of SEPTEMBER 2012, the regulations contained in Government Notice Number R1258 of the 21st July 1972 and R1648 dated 19th August 1977 as amended having been duly complied with.



L. J. COLE

COMMISSIONER OF OATHS