



A. L. Sachs-
MCH 91-6a-9-7

FURTHER FURTHER PARTS
SUPPLIED.

IN THE SUPREME COURT OF SOUTH AFRICA.
(CAPE OF GOOD HOPE PROVINCIAL DIVISION)

In the matter of

THE STATE

versus

1. EDWARD JOSEPH DANIELS
2. DAVID GUY DE KELLER
3. ANTONY ANDREW TREW
4. ALAN BROOKS
5. STEPHANIE KEMP

FURTHER PARTICULARS AT FURTHER REQUEST BY ACCUSED
NOS. 2, 4 AND 5.

A. Ad Main Charge.

1. It is alleged that the said organization had as its aim the overthrow of the South African Government or the coercion thereof to change its policies of apartheid and limited franchise for Non-Whites. The State will rely on both documents and other evidence. It is not proposed to attach these documents to the indictment but they may be inspected by the defence.
2. It is submitted that when accused No. 2 joined the said organization he knew that it had as its aim the overthrow or coercion as aforesaid of the South African Government. It is submitted that this is a matter of evidence which will include inferences from all the facts of the case and the conduct of the accused Nos. 2, 4 and 5 during the period covered by the charge, conduct subsequent thereto and their conduct at the trial.

3(a) It is not known to the State whether accused Nos. 2, 4 and 5 compiled or in any way assisted in compiling any of the said documents.

(b) It is not known to the State whether accused Nos. 2, 4 and 5 procured or in any way assisted in the procuring of the said documents.

(c) It is not known to the State whether accused Nos. 2, 4 and 5 at any time possessed any of the said documents.

(d) It is not known whether accused Nos. 2, 4 and 5 were aware of any of the said documents.

4(a) The programme of the said organization included:-

(1) Violent resistance to the present South African Regime.

(2) An aim to rid South Africa of so-called White domination and bringing about rule by a government elected on the basis of universal adult suffrage.

(3) Dedication and commitment to achieving the overthrow of the whole system of apartheid in South Africa and to establishing a democratic society in terms of basic principles of Socialism.

(4) Unification of all forces fighting for a new social, political and economic order in South Africa.

(5) A full social and political revolution.

(6) To recruit, train and jointly lead a National Freedom Army.

4(b) It is alleged that accused Nos. 2, 4 and 5 were aware of the said programme. It is submitted that this is a matter of evidence which will include inferences from all the facts of the case and the conduct of the said accused during the period covered by the charge, conduct subsequent thereto and their conduct at the trial.

B. Ad the Alternative charge.

The following persons were office bearers or officers of the said organization in the Cape Peninsula as members of the Regional Committee:

Accused No. 1, Robert Watson, Randolph Vigne, Neville Rubin, Adrian Leftwich and Michael Schneider.

The following persons were office bearers or officers of the said organization in the Cape Peninsula as members of the Planning Committee:-

Accused No. 1, Michael Schneider, Adrian Leftwich and Lynette van der Riet.

- (b) As set out in paragraph 4(a). These aims and objects are set out in documents which may be inspected by the defence.
- (c) It is unknown by whom the organization was established.
- (d) The advice of the change of name was received from Johannesburg but the State is unable to state which executive body of the organization changed the name.

C. It is alleged that accused Nos. 2, 4 and 5 and the co-conspirators had as their common object the overthrow of the South African Government or the coercion thereof to change its policies of apartheid and limited franchise for Non-Whites and that they by their acts of malicious injury to property endeavoured to achieve this common object. The State will inter alia rely on documents for these allegations but does not propose to attach them to the indictment. They may be inspected by the defence.

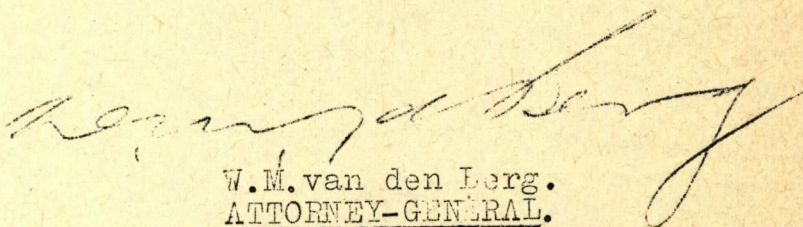
2. It is alleged that accused No. 2 knew that accused Nos. 1 and 4, Adrian Leftwich, Lynette van der Riet, Michael Scheinder, Nevell Hillman, Livingstone Mrwetyana and Neville Rubin were members or active supporters of the said organization.

Whether he knew any others is unknown to the State. It is alleged the accused No. 4 knew that accused Nos. 2 and 5, Adrian Leftwich and Livingstone Mrwetyana were members or active supporters of the said organization.

Whether he knew any others is unknown to the State.

It is alleged the accused No. 5 knew that Adrian Leftwich, Michael Schneider, Accused No. 4 and Accused No. 3 were members or active supporters of the said organization.

Whether she knew any others is unknown to the State.



W.M. van den Berg.
ATTORNEY-GENERAL.

TO:

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