

"PV32"

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LEGAL RESOURCES CENTRE

NPO No. 023-004

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Our Reference: J Brickhill/ 10261/09J

25 August 2009

Khabisi Mosunkutu
Community Safety MEC
Fax: 011-6893660

T Williams
Acting National Commissioner
South African Police Service
Fax: 012-393-1715

Perumal Naidoo
Provincial Commissioner of Police

Chris Ncgobo
Head of the Metro Police

Fax: 011-2747312

Fax: 011-7589200

BY FAX

Dear Sirs

**RAID ON DESTITUTE PERSONS RESIDING OUTSIDE AND AROUND CENTRAL
METHODIST CHURCH ON 3 JULY 2009**

1. We act on behalf of Lawyers for Human Rights (LHR) and the Central Methodist Church, Johannesburg. LHR instructs us that on 6 July 2009, a letter was sent to you in response to the raids carried out on 3 July 2009. LHR further instructs us that they have not received a written response from you to their letter. LHR's letter of 6 July 2009 demanded a written undertaking from the South African Police Service ("SAPS") and the Johannesburg Metropolitan Police Department ("JMPD") to desist from carrying out further raids. A copy of the letter is annexed hereto for ease of reference.
2. In the interim, police action at the Church has continued, in particular raids by JMPD. Most recently, during August 2009, JMPD members have raided the area outside the church on several occasions, confiscating the goods being sold by vendors operating near the church entrance. These raids have often been


National Office:
Cape Town:
Durban:
Grahamstown:
Johannesburg:
Constitutional Litigation Unit:

J Love (National Director), K Reinecke (Director: Finance), A Reed (Donor Liaison)
JW Pienaar (Director), A Andrews, CM Fortun, S Kahanovitz, WR Kerfoot, C May, HJ Smith
MR Chetty (Director), S Samuel
S Sephton (Director), K Govender
N Gobodo (Acting Director), S Dhever, N Fakir, Z Sujee
G Bizos SC, A Friedman, J Brickhill

accompanied by the use of pepper spray on the vendors and other people present outside the church. Two such raids took place during the week of 10 August, and the JMPD conducted daily raids during the week of 17 August 2009. The raid during the evening of 20 August involved more than 6 JMPD vehicles and approximately 50 JMPD members. No one was arrested, but goods belonging to vendors were again confiscated.

3. We are instructed to demand, as we hereby do, a written undertaking from the SAPS and JMPD that such raids will be discontinued. Kindly forward a written undertaking to us by close of business on 31 August 2009. Should we fail to receive an undertaking from you, we may approach a court for appropriate relief without further notice.

Yours faithfully,



LEGAL RESOURCES CENTRE:
Jason Brickhill



*** TX REPORT ***

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RESULT	OK	

250

*** TX REPORT ***

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*** TX REPORT ***

251

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CONNECTION ID		
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*** TX REPORT ***

252

TRANSMISSION OK

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SUBADDRESS		
CONNECTION ID		
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PGS. SENT	4	
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