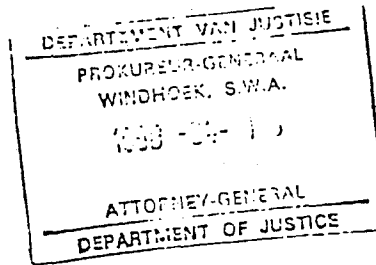


ACHESON

IN THE HIGH COURT OF NAMIBIA



In the matter between:

THE STATE

and

DONALD ACHESON

---

REQUEST FOR FURTHER PARTICULARS

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THE ACCUSED REQUIRES THE FOLLOWING FURTHER PARTICULARS  
TO THIS CHARGE:-

1.

✓ Where exactly did the accused allegedly shoot the  
deceased in Windhoek?

2.

✓ At precisely what time did the alleged shooting occur  
on the 12th of September 1989?

3.

Is it alleged that the accused personally shot and  
killed the deceased? If so, did the shooting occur

...

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while the accused was on foot or while he was in a motor vehicle? If he was in a motor vehicle, was he alone or accompanied by another person/s?

4.

If it is not intended to allege that the accused personally shot and killed the deceased, who is in that instance responsible for the shooting and killing of the deceased? The name/s of the person/s responsible therefore is/are required.

5.

What type of automatic rifle was used in order to shoot the deceased? How many shots were fired with the said automatic rifle and how many struck the deceased?

6.

Is it alleged that a common purpose existed between the accused and any other person/s or that the accused conspired with any person/s to commit the alleged offence. If the answer is in the affirmative:-

(a) With whom did the accused form a common purpose or conspiracy to commit the said offence?

- (b) Precisely when and where was the said common purpose or conspiracy formed?
- (c) Precise details are required indicating the manner in which it arose, in other words whether there was an express or tacit agreement to commit the said offence.
- (d) If a tacit agreement is alleged, full particulars and facts upon which this allegation is based, are required.
- (e) If an express agreement is alleged, precisely when and where was the said agreement formed between the persons involved and what was the precise details thereof.

7.

Did the accused make a statement to any official? If so, a copy/ies thereof is/are required.

...

/6

8.

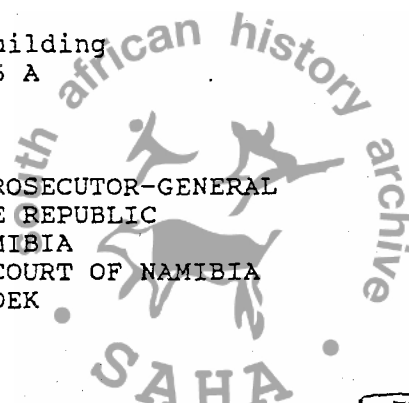
A copy of the report of post mortem examination which had been carried out on the deceased, is required.

DATED AT WINDHOEK ON THIS 9TH DAY OF APRIL 1990.

*[Handwritten signature]*

VAN DER MERWE-GREEFF  
ATTORNEYS FOR ACCUSED  
Second Floor  
Kock & Schmit Building  
Garten Street 26 A  
WINDHOEK

TO: THE PROSECUTOR-GENERAL  
OF THE REPUBLIC  
OF NAMIBIA  
HIGH COURT OF NAMIBIA  
WINDHOEK



1990/4/10  
9h35  
*[Handwritten signature]*

DEPARTMENT VAN JUSTISIE  
PROKUROR-GENERAAL  
WINDHOEK, S.A.A.  
ATTORNEY-GENERAL  
DEPARTMENT OF JUSTICE

*[Handwritten mark]*