

SOUTH AFRICA REVENUE SERVICE
299 Bronkhorst Street
Pretoria 0011

CC: FIRST NATIONAL BANK
CC: MR [REDACTED]
OUR REF: 78/9870/989
19/09/2019

Dear Sir,

South Africa has a non-residents tax system which means that individual will be subject to tax only on income that has its source in South Africa as contain in Tax Act, 1962 in terms of South Africa common Law. Since tax systems differ from country to country, there is a chance that a particular amount could be taxed twice. This possibility of double taxation is, however, often alleviated by tax relief contained in various Double Taxation Agreements (DTAs). These DTAs are international agreements contracted between countries to deal with potential competing taxing rights against the income of the same taxpayer. Under the provisions of the DTA, the non-resident's remuneration earned in South Africa may not be subject to normal tax in South Africa where specific requirements are met.

It has come to our notice that the outstanding tax fees of the Loans [\$20M] going into the Bpost Bank with account number BE23 0004 1643 9891 has not being paid. We have received up till date \$00.00.

We must not fail to remind you [Mr. [REDACTED]] beneficiary, to the outgoing funds transfer the consequences of transferring money out of South Africa without duly comply with the Tax Act of 1962 and re-amended in 1995, Section 21 of the Subsection 1V in accordance with the provisions of the DTA, that the non-resident's remuneration source in South Africa may not be subject to normal tax in South.

You are therefore urge to urgently comply with these conditions outlined for the release of the Loans into the receiving Bank account which is to be paid in full.

Total amount expected \$1000,00 [One thousand Dollars] Only.


We will not hesitate to place your funds under exhibit if these conditions are not meant.

ORIGINAL PAYMENT AMOUNT US\$1000,00

AMOUNT RECEIVED TILL DATE US\$00,00

TOTAL OUTSTANDING BALANCE US\$1000,00

Yours sincerely


Mrs Vivian Phillip.