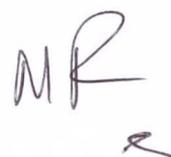

**AFFIDAVIT IN THE SECTION 194 ENQUIRY INTO THE REMOVAL OF THE
PUBLIC PROTECTOR, ADV B MKHWEBANE**

I, the undersigned,

NDITSHENI RAEDANI

do hereby make oath and say that:

1. I am a practising advocate and a member of the Limpopo and Johannesburg Bars.
2. The contents of this affidavit are to the best of my recollection true and correct and fall within my personal knowledge, unless otherwise stated or clear from the context.
3. The evidence leaders have provided me with access to some of my emails from my time at the Office of the Public Protector ("**OPP**"). I refer to some of those emails below. However, I have not had access to all of my emails. If further correspondence becomes available, I may have to depose to a supplementary affidavit.



A. MY EXPERIENCE AT THE OPP**(i) My roles within the organisation**

5. I was employed at the OPP from October 2008 to December 2018, during which time I was promoted from investigator to senior investigator and worked in various parts of the organisation.

6. As far as I can recall, in 2017 I was transferred to the office of the current Public Protector, Adv Busisiwe Mkhwebane (“**the PP**” or “**Adv Mkhwebane**”), which was known as the private office. Amongst other things, I was involved in the quality assurance of investigation reports, together with a small team. As far as I can recall, this team comprised senior and junior investigators, including (at one time or another) Adv Isaac Matlawe, Mr Tebogo Kekana, Ms Matau Sefako (a junior investigator) and later Mr Muntu Sithole (who was then a very junior member of the team). All of us reported to the Senior Manager: Executive Support or, later, to the Chief of Staff. A trainee investigator – Ms Nandi Muridili – also reported to me.

7. To the best of my recollection, our quality assurance function entailed:
 - 7.1. Checking whether the complaint was brought in terms of the correct statute, and whether the complaint had been accurately captured and addressed in the report;

 - 7.2. Checking to see whether proper statutory processes had been complied with, including the issuing of notices in terms of section 7(9)

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of the Public Protector Act 23 of 1994 ("**the PP Act**"), or whether the provisions of the Executive Members Ethics Act, if applicable, had been complied with;

- 7.3. Considering whether the evidence collected had been reasonably assessed;
 - 7.4. Checking whether the conclusions drawn from that evidence were reasonable;
 - 7.5. Considering whether avenues that should have been explored were ignored or insufficiently pursued by the investigators;
 - 7.6. Checking that the report recorded the relevant law correctly;
 - 7.7. Assessing whether the recommended remedial actions were appropriate and lawful; and
 - 7.8. Scrutinising the report to determine whether it disclosed any reviewable irregularities.
8. Depending on the nature of the case, we would consider not only the report itself, but also all of the supporting evidence. For example, in respect of the Vrede investigation (discussed below), we considered not only the draft report, but also the entire file of evidence and supporting documentation.
9. During my time in the private office I worked closely with the PP, as did the other members of the private office.

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10. I was also actively involved in union activities. The Public Servants' Association ("PSA") became the majority union representing employees of the OPP. I was a shop steward, which entailed dealing with various staff disputes and grievances that would arise. I remained a shop steward until 2018.

(ii) My departure from the OPP

11. I resigned from the OPP towards the end of 2018 in order to do pupillage (i.e. the year of unpaid training that individuals do in order to become advocates) during 2019. I have always wanted to become a practising advocate.

12. My application to do pupillage had already been submitted mid-way in 2018, at which point I was not facing any form of disciplinary charges. Given the unpleasant climate prevailing at the OPP (discussed in greater detail below), it seemed an appropriate time for me to apply to do pupillage as it was in any event my long-term goal.

13. At some point during 2018 I was given an "audi letter", requesting that I provide reasons why I should not be charged with misconduct for my alleged failure to complete certain work on time. I responded that this was a performance-related issue and not a misconduct matter. I further pointed out that, in any event, the requisite disciplinary policies were not being followed. I heard nothing further in relation hereto and was not subjected to any disciplinary action.

14. Part of the reason that I regarded the OPP as being an unpleasant working environment was my perception that I had become a target for the PP.

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15. The evidence leaders asked me as to why I would be a target. In my view I was a target because of my involvement in the activities of the PSA, my professional disagreements with the PP and my known good working relationship with the former Public Protector, Prof Madonsela. I had a strong sense (again, in my view, although I believe it was shared with others), that Adv Mkhwebane had been advised, or had decided, to purge the private office and elsewhere in the OPP of those who were perceived as having been close to Prof Madonsela. Indeed, a number of persons either left or were forced to leave after Adv Mkhwebane took over.
16. Those of us who had been investigators in the Private Office (including Adv Matlawe, Mr Kekana, Mr Sithole, Ms Sefako and myself) were moved out and placed in the Provincial Investigations branch under Mr Reginald Ndou. We were simply informed that we were being moved by the CEO. I was not provided with reasons for the move. At the time I did not ask for reasons.
17. Mr Ndou and Adv Matlawe were subject to disciplinary action. I am informed that they will be giving evidence to the Committee and would be best placed to relay their own stories.
18. So this in my view reflected that union personnel were being targeted: Adv Matlawe, Mr Kekana and I were the PSA leaders in the OPP and had been vocal about certain issues, most pertinently at that time the appointment of Mr Vussy Mahlangu, who was perceived as being tainted by corruption allegations.

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19. I must point out that I never had personal disagreements with the PP. I routinely gave the PP independent – and what I believed to be sound – advice, which did not always align with her wishes or objectives. I believe that this caused some consternation.
20. The PP at times arrived, in my view, with a particular outcome in mind, and then sought to justify that outcome, irrespective of the relevant evidence or arguments, or other people’s perspectives. This, too, caused her to get upset at the fact that I would not align my advice or my work to the pre-determined outcome sought. I always operated from the point of view of the institution’s mandate, not in order to achieve any preconceived conclusion. Of course if the PP wanted a report amended in a particular manner there was nothing much I could do about it.
21. For example, in respect of the Vrede report, the PP insisted on various changes being made that significantly watered down the report’s conclusions (as discussed below). I did not support the changes. They were materially different from the earlier versions of the report and the evidence on hand. I informed the PP that these changes would have serious and adverse consequences for the OPP, but she was indifferent. I clearly recall that “*Anginandaba*” was her response to me when I raised these concerns.
- (iii) Changes in the OPP under Adv Mkhwebane
22. There were numerous changes that came about when the PP took office. Whilst I appreciate that each incumbent in the OPP is at liberty to manage the

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office as they wish, the changes that Adv Mkhwebane made were, in my view, not always in the best interests of the OPP.

23. Furthermore, I got the sense that the PP was creating an impression that her predecessors had not done things properly, or as well as they could have. For example, Adv Mkhwebane collapsed the Think Tank structure (a quality-assurance body that comprised all of the provincial and senior investigative managers, who would gather on a regular basis to scrutinise reports), which structure had been created by Adv Mushwana and continued by Prof Madonsela, in favour of a small committee consisting of the PP, the PP's Chief of Staff, the Chief Executive Officer ("CEO"), the PP's spokesperson and some of us investigators in the private office, to conduct quality assurance.
24. There was no formal communication around the dissolution of the Think Tank. I just heard that there would be no more Think Tank meetings (I cannot now recall precisely when this occurred). When I asked my manager for the justification, I was simply informed that the PP did not want the Think Tank anymore.
25. In my view, the new smaller committee was not properly constituted, and could not (and did not) adequately replace the purpose sought to be achieved by the Think Tank in that:
- 25.1. It included the Chief of Staff, who had no legal qualifications, and who was also a junior staff member;

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- 25.2. It excluded the Deputy PP, even though previously he had participated in quality-assurance initiatives (including the Think Tank);
- 25.3. It included the CEO, even though his responsibilities in the organisation were not related to the OPP's core functions of investigating and reporting, and even though it appeared that he had no investigation experience and little or no contribution to make to investigations;
- 25.4. It included the PP's spokesperson, who also had no legal (or otherwise relevant) qualifications; and
- 25.5. It excluded the persons with the relevant investigation experience and legal knowledge, including the various Executive Managers and Provincial Representatives and the Knowledge Manager.
26. I accept that the PP ultimately decides what must go into each report that the OPP produces, and bears responsibility for the shortcomings of any report issued by the OPP. For that reason she is entitled to make decisions of this nature given that she is fully and ultimately responsible for the contents of reports. But the change in approach may well have also contributed to the quality of reports and the increase in reviews thereof.
27. Furthermore, it was not clear to me why a structure that was aimed at strengthening reports would be abandoned and replaced with a smaller team which lacked the collective investigative experience of those who sat in the

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Think Tank. My own experience and those of the constituted quality assurance committee would clearly not equate to the experience that senior management brought to bear in interrogating these reports.

28. There were also other issues in the office that concerned me. Through my union activities, and from colleagues involved in the Supply Chain Management and Finance Department, I had begun to hear more and more complaints about the OPP's rising expenditure on lawyers' fees. It could well be that increasing legal fees were adversely affecting the organisation's other operations. For example, our Head Office building was set up to accommodate approximately 100 employees. Later the staff complement had grown to approximately 150 – 160, if not more, and the building was excessively congested – there was a desperate need for more space. Staff were forced to share small offices that were not meant to be shared.
29. Accordingly, a process was undertaken to procure additional office space in the same commercial precinct as our existing headquarters. However, before I resigned in 2018, the lease for the new building was terminated. We were told that this was because the OPP could not afford the additional accommodation.
30. There was a high turnover of staff under the PP and it was apparent that important institutional memory was being lost. In addition, the PP's managerial style was not, in my view, conducive or beneficial to comprehensive investigations which could give rise to complete and full reports with succinct and appropriate remedial action.

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B. THE VREDE INVESTIGATION

31. I was part of the team that dealt with the Vrede Dairy report which was issued by the PP on 8 February 2018.
32. The matter involved a complaint by a member of the Free State Provincial Legislature who raised concerns in 2013 about the Free State Provincial Government's Vrede Dairy Project. The initial investigation was done at the provincial level and the matter was later transferred to head office. By that time there were several versions of the report. This is not unusual as the report writing process can be dynamic.
33. A Task Team was established late in 2017 to fast track and finalise the investigation and the report. I was a member of this Task Team, together with Mr Kekana (a seasoned senior investigator in the private office), Mr Sithole, as a junior member and Mr Ndou as the Task Team leader. Mr Kekana had been involved in the Vrede investigation at an earlier stage, even before the site visit in April 2017, and had had various interactions with the Free State office as it progressed with the investigation. Mr Ndou also had previous involvement, as the Executive Manager to whom the Free State office reported.
34. As far as I can recall, my first involvement with the Vrede investigation was towards the end of 2017, after the provincial officials had completed their investigations and the file had been handed over to the Provincial Investigations branch at head office.

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35. On 16 November 2017 Mr Ndou circulated a draft of the Vrede report (“**the November 2017 draft**”) to the other members of Task Team. A copy of his email correspondence is annexed marked “**NR1**”. It reads:

“As you are aware the Public Protector has approved the Task Team to finalise Vrede Dairy Project matter. Attached hereto are the following:

1. *The final version of the Report*
2. *Copies of letters directed to the Ministers Agriculture and DTI*
3. *Copy of a letter directed to the Premier: Free State*
4. *Legal Opinion from Nemasisi pertaining to the issue of the nature of the project (whether it's a PPP or not)*

Junia will provide you with copies of files with invoices received from the Premier and those received from the Department of Agriculture in the Free State. The latter are contained in the Cream white arch lever files.

The Public Protector's instructions are the following:

- a) *To write reminders to the two Ministers for her signature; her view is that what we have requested from the two ministers will give us a good idea of how a project such as the Vrede project should be properly run, and then benchmark Vrede against that;*
- b) *To do a comparison of the two sets of invoices to see if payments were done in after submission of proper invoices.*

You will notice in the report that there is just a one liner about the Gupta emails. I raised the issue with the Public Protector but did not receive a response. When I checked the Amabhungane website there are various allegations pertaining to monies from this project. For example there are allegations that R84M was siphoned off to a Gupta offshore account and that the Gupta wedding in Sun City was paid for from funds in this project.”

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36. Mr Ndou's email correspondence referred to the Gupta-leaks emails. However, the PP was adamant that those should not be included in the investigation.
37. By the time I received this correspondence and saw the draft, the section 7(9) notices (i.e. notices offering implicated parties the opportunity to make representations regarding the OPP's possible findings against them) had already been sent and responses received. The email therefore includes a draft letter of response to Ace Magashule, the then Premier of the Free State, highlighting the documentation and information that is still outstanding notwithstanding his response to the section 7(9) notice.
38. I was also aware, when I received the November 2017 Report, that there had been numerous versions of the draft report in circulation previously. By then the whole of the file had been handed over to Head Office by the Free State Provincial Office.
39. A copy of the November 2017 Report is annexed marked "**NR2**". Although the report is dated "*September 2017*" in the header, I have referred to it as "*the November 2017 Report*" because that is when it was circulated with Mr Ndou's edits. The findings contained therein were largely the same as those set out in an earlier version of the report, circulated by the Free State office in September 2017 ("**the September 2017 Report**").
40. The evidence leaders provided me with my email correspondence of September 2017, which includes the September 2017 Report. The cover page and executive summary circulated by Mr Ndou are annexed marked

"NR3". Whereas the September 2017 Report had concluded that the Accounting Officer was guilty of financial misconduct in respect of the inflated prices for animals, equipment and infrastructure, the November 2017 Report omitted that finding. I do not recall on whose instructions that particular finding was removed, or what the motivation for the omission was. As far as I can recall, through the duration of the investigation and the report-writing process, the investigation team was of the view that there had been financial misconduct.

41. From the evidence on record available at the time:

41.1. Premier Ace Magashule and Mr Mosebenzi Zwane ("**Mr Zwane**"), the Member of the Executive Council for Agriculture ("**the MEC**"), had taken no steps to put into effect the recommendations of the National Treasury in respect of the procurement irregularities associated with the Vrede Project. The Premier and the MEC were clearly involved in the Vrede Project.

41.2. There was sufficient evidence to justify findings of maladministration against the Premier and the MEC. I recall such findings being in at least one version of the draft report that I saw, although I cannot now recall which one.

42. Towards the end of 2017 a meeting was held between Mr Mmusi Maimane ("**Mr Maimane**"), the former leader of the Democratic Alliance (a political party), and the PP to discuss the Vrede Report. The meeting was held at the OPP

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Head Office in Pretoria. Mr Maimane brought some of the intended beneficiaries of the Vrede project with him, unannounced.

43. I attended the meeting, although I did not participate in the discussions. I recall there being around 50 men and women who were in attendance. They discussed their dissatisfaction with the manner in which the investigation was being conducted, and the length of time it had taken to complete, given Prof Madonsela's undertaking to complete the investigation much earlier. At the conclusion of the meeting, it was agreed that the OPP would issue a report within a few months, which is ultimately what happened at the beginning of February 2018.
44. At the meeting Mr Maimane undertook to provide the OPP with details and statements from the beneficiaries. I cannot recall if this information was ever submitted. However, at the time I did not think it was necessary for purposes of the investigation, as the information contained in such statements would not have clarified any of the alleged wrongdoing (procurement irregularities) and the OPP would have avoided publishing the individuals' details.
45. In January 2018 a memorandum on the status of the investigation was prepared on behalf of the Task Team investigators – Mr Kekana, Mr Sithole and myself – and submitted to Mr Ndou. Copies of the email correspondence, and the draft memorandum, are annexed marked “NR4”. The draft memorandum included, inter alia, the following findings (which reflected the views of the Task Team investigators):

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- 45.1. The conclusion of the agreement violated the relevant procurement prescripts, including section 217 of the Constitution;
- 45.2. The conduct of the Accounting Officer was improper;
- 45.3. The prices for goods and services for construction, processing equipment, procurement of cows and administration costs were inflated; and
- 45.4. The prices of the milking equipment, the gate, guard house and the cows were considerably higher than the prevailing market prices.
46. The memorandum also noted that various aspects of the investigation still had to be concluded, including: considering the recent submission from the Premier's office; considering the legal opinion regarding the public-private partnership; evaluating the evidence in respect of the project's intended beneficiaries; and awaiting the further evidence from Mr Maimane. Once these issues were attended to, we were of the view that a report could be submitted for consideration.
47. As far as I am aware, the memorandum was duly submitted to the PP. I do not recall ever seeing a response thereto.
48. In the week of 5 February 2018, Mr Ndou summoned Adv Matlawe, Mr Kekana and me, and advised us that the PP wanted to sign the Vrede report shortly. I recall that I had to work very hard during that week to comply with the PP's wishes, working very late hours.

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49. The draft was also circulated to Mr Nemasisi, the Senior Manager: Legal Services, who provided his input. At the time, it was standard practice for reports that had been through the quality-assurance process to be submitted to Mr Nemasisi, so that he could advise on whether there were any reviewable irregularities in the draft under consideration.
50. On one of the mornings during that week of 5 February 2017, Mr Kekana and I were called into a meeting with the PP. She indicated that she was not pleased with our work on the draft report, because it did not reflect her instructions. She then gave us a series of instructions on how to amend the report. Mr Nemasisi was also required to provide input and make changes. Mr Ndou was not very much involved in the redrafting the PP required, because he was on leave for a portion of that week. Even though Mr Sithole and Adv Matlawe were part of the Vrede Task Team, as far as I can recall they also did not have much involvement in finalising the report.
51. On 8 February 2018, at 16h17, Mr Kekana circulated a draft of the Vrede report to myself, Messrs Matlawe and Nemasisi, and Ms Cleopatra Mosana ("**Ms Mosana**") (at that stage she was still the PP's spokesperson). His email noted that he had effected amendments in respect of: "*1. The Complaint*"; "*2. Issues not investigated*"; "*3. Issue and observations*"; and "*4. Remedial action*". These were the changes that the PP had directed him to make.
52. Mr Kekana asked me to revise the document further and send it on to Adv Matlawe. Ms Mosana was copied in as it was her responsibility to prepare

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a media statement in respect of the report, thus indicating that the release of the final report was imminent.

53. Approximately 20 minutes later, at 16h35, Mr Kekana circulated another version of the report, noting that *“the paragraphs in the remedial action regarding referring the matter were not deleted”*. A copy of Mr Kekana’s email correspondence is annexed marked **“NR5”**.

54. A copy of the second version of the report (**“the Kekana Version”**) is annexed, marked **“NR6”**. The Kekana Version contains many tracked changes, mostly from Mr Kekana, but also changes that Mr Nemasisi had made.

54.1. For the first time, the report records that certain issues were not investigated *“due to capacity and financial constraints experience [sic] by the Office of the Public Protector”*. These include: *“[i]ssues emanating from the complainant sent on 10 May 2016”*; how the money was spent by Estina; who the beneficiaries were; and the *“Guptaleaks”* emails.

54.2. Also under the heading of issues that were not investigated were the recordals that the *“complaint did not have allegations against the former MEC for the Free State Department of Agriculture, Mr Mosebenzi Zwane”* and the *“complaint did not raise any allegations against the Premier of the Free State Province, Mr Ace Magashule”*.

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- 54.3. Notable changes included removing the findings of gross irregularity, improper conduct, abuse of power, infringement of the Constitution and maladministration in respect of the Accounting Officer's procurement activities. Whereas the previous versions of the draft had recorded that the Department had failed to comply with applicable procurement prescripts, the report now concluded that the Department never entered a public-private partnership with Estina.
55. The abovementioned changes were all amendments that the PP had expressly directed should be made.
56. The findings of inflated prices and overcharging were maintained, and Mr Nemasisi in fact re-inserted the finding of financial misconduct.
57. The section setting out the OPP's findings on alleged non-compliance with environmental legislation was completely removed.
58. Mr Nemasisi remained concerned that the OPP had failed to obtain invoices and receipts from Estina. He was also concerned that the OPP did not conclude that the environmental legislation had been infringed.
59. The changes described in paragraphs 54.1 – 54.3 above were not, to the best of my recollection, changes that members of the Task Team agreed with. However, the PP instructed that they be made, and ultimately, as she was the constitutional office-bearer and the executive authority, her instructions were implemented.

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60. After Mr Kekana's email, I circulated another version of the draft report, which reflected additional changes that the PP had required me to effect.

60.1. A copy of my email correspondence is annexed, marked "NR7".

60.2. A copy of the revised report is annexed, marked "NR8".

60.3. As will be noted from the revised report, both the findings of financial misconduct, and the findings that the prices had been inflated / overcharged, were removed. As with the changes referred to in paragraphs 54.1 – 54.3 above, I did not agree with these amendments, but implemented them at the PP's insistence.

61. At 17h15 on 8 February 2018, just after I had circulated the revised version of the draft, Mr Nemasisi circulated a further version of the draft with his "*preliminary comments*" to me and Mr Kekana ("**the Nemasisi Version**").

61.1. A copy of the email correspondence is annexed marked "NR9".

61.2. A copy of the version with Mr Nemasisi's changes is annexed marked "NR10".

61.3. Mr Nemasisi made various changes to the draft, including inserting findings that the Accounting Officer had not followed the procurement processes prescribed by the Constitution and the applicable national legislation.

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- 61.4. Mr Nemasisi also noted various concerns. He was concerned that the report made no reference to interviewing the Accounting Officer and the director of Estina, who were material. He suggested that bank statements should be obtained, so that the OPP could make findings in respect of money laundering. He recorded concerns that the OPP had failed to obtain necessary warrants, and that further documents should at least have been requested from Estina. He also pointed out that the report's conclusions actually required a finding that there had been non-compliance with environmental prescripts.
- 61.5. Mr Nemasisi recommended that the items whose prices had been inflated should be expressly set out in the report's findings.
62. In response to my abovementioned email, Ms Linda Molelekoa ("**Ms Molelekoa**"), who was the PP's Acting Chief of Staff ("**ACOS**") responded as follows:
- "Hi Ntsu [i.e. Mr Nemasisi]*
- Seeing that Matlawe is gone and PP is now left alone – she asked that you assist her in checking it for her she will be back shortly.*
- Nditsheni – why is this report still showing inputs of others – were you not supposed to consolidate this and submit to Matlawe to finalize QA?*
- Please help guys – PP wants this report"*
63. A copy of the above email correspondence is annexed, marked "**NR11**".

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64. I informed the ACOS that Adv Matlawe ought to have consolidated the report, and cleaned it up, before it was submitted to the PP. A copy of my email correspondence is annexed, marked "NR12".
65. Out of the Task Team members, I was the only one still left in the office. I got called in to the PP's office. I was joined by Ms Mosana and the ACOS. I think that Ms Motsitsi may also have been in attendance, at least for some of the time, but I am not entirely sure of this.
66. I was informed by the PP that we would be finalising the draft report. Using my laptop, the report was projected onto a screen, and we went through it paragraph by paragraph. The PP would dictate to me what she wanted me to type. Towards the end, the PP took my laptop and typed herself.
67. I did not agree with the changes the PP was effecting. I am not the sort of person who just takes instructions, so I cautioned the PP as to what legal commentators would say about the final report, and warned her that her changes would cause trouble. However, it was quite clear that the PP had made up her mind as to what was going into the report, no matter how significant and unreasonable a departure it was from the conclusions in the previous iterations of the report and the evidence that had been discovered.
68. It was in response to my concerns that the PP said "*anginandaba*" (which translates loosely as "*I don't care at all*").
69. After we were done, I even warned Ms Mosana not to come into work the next day. Previously, after the CIEX report had been issued, the OPP had received

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scathing criticism from commentators – it was so bad that Mr Mzwanele Manyi had to call the PP to console her. I informed Ms Mosana that, as the spokesperson for the OPP, she could receive a similar backlash.

70. By the time I left the office that night, the PP was in high spirits.
71. The final version of the Vrede report was signed by the PP late on the night of 8 February 2018 (“**the Final Report**”).
- 71.1. The Final Report found that the Department had not infringed the regulations regarding public-private partnerships, but recorded the OPP’s “*concurrence*” with the Accountant General’s conclusions that there had been procurement irregularities.
- 71.2. Like the February 2018 Report, the Final Report concluded that there was gross negligence, improper conduct and maladministration in the management and monitoring of the Vrede Dairy project.
- 71.3. The Final Report did away with both the conclusion of financial misconduct that Mr Nemasisi had recommended, and the findings of inflated prices and overcharging that had been consistently carried through numerous versions of the draft report (and was supported by reliable evidence).
72. I am advised by the Evidence Leaders that the Final Report is part of the record before the Committee.

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73. On 6 March 2018 the Portfolio Committee: Justice and Correctional Services raised concerns about the report and requested the PP to consider the role of politicians in the Vrede Dairy Project. Shortly thereafter, the PP instructed me to reinvestigate the matter with a focus on the role of politicians.
74. I started the investigation afresh. The first person I arranged to speak to was Mr Magashule. The PP, Mr Ndou and I met with him during October 2018. As the investigators, I expected Mr Ndou and I to be allowed to ask Mr Magashule lots of questions. However, the meeting was rushed – I think it may not even have lasted for 30 minutes. I hardly got anything of what I needed from Mr Magashule, as the PP did most of the talking. Before I could persist with questions, Mr Ndou and I were informed by the PP that we were excused from the meeting and directed to leave. The PP indicated that she wanted to “*have a constructive discussion with the SG*”, which she did by herself.
75. Mr Ndou and I left Mr Magashule and the PP alone. I do not know what they discussed – I was not subsequently informed, even though I was the lead investigator on the case. The meeting should have been recorded, as it was related to an investigation. However, I was not provided with a recording for purposes of compiling the report.
76. The second Vrede report was issued after I left the OPP.

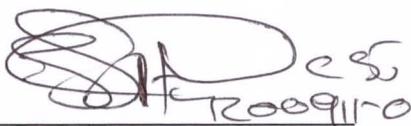
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I certify that the above signature is the true signature of the deponent and that he has acknowledged that he knows and understands the contents of this affidavit which affidavit was signed and sworn to before me in my presence at Wierdabrug on this 26 day of **JULY 2022**, in accordance with Government Notice No R1258 dated 21 July 1972, as amended by Government Notice No R1648 dated 19 August 1977, as further amended by Government Notice No R1428 dated 11 July 1980, and by Government Notice No R774 of 23 April 1982.

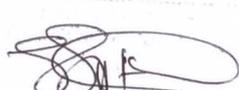


COMMISSIONER OF OATHS

SOUTH AFRICAN POLICE SERVICE
COMMUNITY SERVICE CENTRE
2022 -07- 26
WIERDABRUG SAPS
SUID-AFRIKAANSE POLISIEDIENS

(Faint text in Afrikaans and English regarding affidavit procedure)

Wierdabrug 2022-07-26 13:47



FULL NAME: Sandra Sibole

LETTERS: SIBOLE

RESIDENCE ADDRESS: 45 Lindheer road

RANK: Constable

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SA POLICE SERVICE

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