



**The Full Gospel Church of God**  
**Die Volle Evangelie Kerk van God**

IN SOUTHERN AFRICA / IN SUIDELIKE AFRIKA

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To: **The Standing Committee on Finance**  
For attention: Mr Allen Wicomb and Ms Teboho Sepanya  
Per email: [awicomb@parliament.gov.za](mailto:awicomb@parliament.gov.za); [tsepanya@parliament.gov.za](mailto:tsepanya@parliament.gov.za)

**Re: General Laws (Anti-Money Laundering and Combating Terrorism Financing) Amendment Bill [B18-2022]**

From: Organisation: **THE FULL GOSPEL CHURCH OF GOD IN SOUTHERN AFRICA**

Contact persons: **MADELEIN SONÉ BOTHA**

*Legal Advisor*

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**PASTOR S PETERSEN**

*Moderator of the Full Gospel Church of God in Southern Africa*

E-mail: [moderator@fgcsa.co.za](mailto:moderator@fgcsa.co.za)



Date: **07 October 2022 (Deadline for comments: 10 October 2022)**

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1. The Full Gospel Church of God in Southern Africa (hereinafter referred to as “the FGC”) is a voluntary association not for gain that serves as the administrative center of the organisation for:

- 1.1. existing assemblies;
- 1.2. workers;

**USA OFFICE**

25th at Keith street, Cleveland, USA

- 1.3. ministers, including evangelist, missionaries, probationary and ordained pastors;
  - 1.4. local preachers, lay preachers, licensed ministers and Christian workers.
2. The Full Gospel Church of God in Southern Africa is also tasked to establish local churches, organized upon a sound Scriptural basis; Sunday schools and Bible training institutions for the training of potential ministers and Christian workers.
  3. The operation of the Full Gospel Church of God in Southern Africa and all members, assemblies and workers are governed by the Constitution of the Full Gospel Church of God. A copy of same will be made available on request.
  4. The leadership of the Full Gospel Church of God in Southern Africa is as follows:
    - 4.1. Pastor SC Petersen (Moderator);
    - 4.2. Pastor R Pelsler (Secretary-General);
    - 4.3. Pastor TI Mufamadi (First Deputy Moderator);
    - 4.4. Pastor JZ Mvelase (Second Deputy Moderator);
    - 4.5. Pastor DD Enslin (Third Deputy Moderator);
    - 4.6. Pastor EJ Moodley (Executive Council);
    - 4.7. Pastor GM Taff (Executive Council);
    - 4.8. Pastor JP Calitz (Executive Council);
    - 4.9. Pastor J Theron (Executive Council);
    - 4.10. Pastor EJ Govender (Executive Council);
    - 4.11. Pastor B Moodley (Executive Council);
    - 4.12. Pastor PA Buckley (Executive Council);
    - 4.13. Pastor L Sanabria (Executive Council) and
    - 4.14. Pastor NM Bowers (Executive Council).
  5. The Full Gospel Church of God in Southern Africa is an established church organisation and has been in existence for more than 110 years. FGC currently has about 1 400 assemblies across Southern Africa serving approximately 1 000 000 members across all demographic and cultural groupings.
  6. The vision of the FGC arises from the understanding of what the sovereign GOD purposes to do for and through His Church.

7. The FGC is to be a movement committed to the authority of the Holy Scripture for faith and direction. A fellowship whose worship brings God's power into life of the church and extends that power through the lives of believers into the marketplace of life. A body that is directed by the Spirit fully understanding that baptism in the Holy Spirit is both a personal blessing and an endowment of power for witness and service in fulfilling the Great Commission. A people who hunger for God, experience the presence of God, and stand in awe of His holiness as He transforms believers into conformity with Christ, in character and purpose.
8. A New Testament church which focuses on the local congregation where the pastor nurtures and leads all members to exercise spiritual gifts in ministry. A church that loves all people and stands opposed to any action or policy that discriminates against any group or individual because of race, colour, or nationality. A movement that evidences love and concern for the hurts and loneliness of the unsaved through aggressive evangelistic, discipling and nurturing ministries. A church that is Christ-centered, people-orientated and needs sensitive in all its programmes and ministries. A movement that promotes policies and ministries which reflect an open, sincere effort to remain relevant to each generation. A prophetic people who herald our Lord's return and a coming Kingdom.
9. As a faith-based institution, we are concerned that the General Laws (Anti-Money Laundering and Combating Terrorism Financing) Amendment Bill [B18-2022] ("the Bill") **violates our constitutional rights** as religious persons / a religious organisation **to religious freedom**, which includes the right to manifest religious belief without fear of hindrance or reprisal, (section 15), **freedom of association** (section 18) and **as a religious community to practise our religion together** (section 31).
10. We hereby lodge our objection to the unreasonably brief time frame given by Parliament for public comments on the Bill. The prescribed period (from 27 September 2022 until 12h00 noon on 10 October 2022 - a mere 9,5 days) is totally inadequate for this purpose, given the significant amendments proposed by the Bill, including a jail sentence for non-compliance.
11. It is insufficient to say that because a second public participation process will occur in front of Parliament's second house, the National Council of Provinces ("NCOP"), the

above process followed by the Committee was reasonable and allowed effective public participation as required by law.

12. We specifically oppose:
  - 12.1. Clause 10 of the Bill that proposes making registration as a Nonprofit Organisation (“NPO”) compulsory; and
  - 12.2. Clause 14 of the Bill (read with section 30 of the NPO Act, 1997), which will make failure to comply with these provisions is a criminal offence with a sanction of an unspecified fine and/or jail sentence.
  
13. We call for:
  - 13.1. NPO registration remain voluntary, given the duplication of registration/reporting/compliance duties considering most NPOs already being registered with other state institutions<sup>1</sup> and already having to comply with various tax reporting requirements imposed by SARS.

*Alternatively, that:*

**13.2.** Section 12(3) of the NPO Act be amended to specify that DSD cannot require changes to religious organisations’ founding document that would interfere with the religious organisations’ doctrines / tenets / beliefs; ***and that***

13.3. Section 30 of the NPO Act be amended to remove the threat of imprisonment and/or a limitless fine.

Yours faithfully,



**Pastor Stafford Petersen**  
*Moderator of the Full Gospel Church in Southern Africa*

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<sup>1</sup> E.g. as nonprofit companies with the Companies and Intellectual Property Commission (“CIPC”), trusts with the Master’s Office and with SARS for trusts, NPCs and voluntary associations.