

Ian Levitt

ATTORNEYS & CONVEYANCERS

Writer's Email : ian@ianlevitt.co.za

Your Ref : GENERAL SITOLE
Our Ref : I Levitt
Date : 24 June 2021

**NATIONAL COMMISSIONER
SOUTH AFRICAN POLICE SERVICES
PRIVATE BAG X94
PRETORIA
0001**

**ATTENTION: GENERAL SITHOLE
PER EMAIL: sitolek@saps.gov.za**

Dear Mr Commissioner

RE: MAJOR GENERAL F KHAN // PAUL O SULLIVAN

1. We act for Major General F Khan ("our client") who has instructed us as set out herein.
2. Our client is justifiably concerned that Mr Paul 'O Sullivan (Sullivan), a Private Investigator of sorts, has initiated an unlawful and malicious inquiry (the "Sullivan inquiry") by the Directorate for Priority Crime Investigation ("DPCI") into the private affairs of and concerning our client and his business interests.
3. Over the past several days our client has been made aware by several of his sources that Sullivan has made it widely known that he has instituted criminal charges against our client and was being supported in his endeavours by the DPCI.



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CONVEYANCER: IN ASSOCIATION WITH MICHELLE CHAVKIN ATTORNEYS

IN ASSOCIATION WITH DARRYL LEVITT LAW | Deloitte Building, 400 Applewood Crescent Suite 100, Vaughan, Canada, ON, L4K 0C3

For service in terms of Rule 4A(1)(c) email copy to: info@ianlevitt.co.za

4. Our client, unaware of the full details of the Sullivan inquiry decided to approach Sullivan to obtain clarity thereof. Pursuant thereto a meeting took place between our client and Sullivan at Sullivan's Sandton offices on 15 June 2021. At the meeting Sullivan strenuously denied any involvement in any inquiry into our client or his affairs, and even offered to confirm this under oath. Our client declined this overture.
5. Pursuant to the meeting, our client made further enquiries and reliably ascertained that Sullivan was not being truthful and that in fact not only had Sullivan laid criminal charges with the DPCI, but that Sullivan had accessed our client's personal information in doing so and in contravention of the Protection of Personal Information Act ("POPI").
6. Bearing in mind the above, our client, a very senior and well-respected member of the SAPS, is justifiably concerned about the conduct of the DPCI, at the behest of Sullivan.
7. What details our client does have, is that the Sullivan inquiry apparently involves our client allegedly not having disclosed his business interests as he was obliged to do. Our client however records that he commenced his business, in respect of which the Sullivan inquiry apparently relates, in 1999 and these interests have been declared ever since and in full compliance of our client's obligations to do so. In fact, our client has received approval of his latest 2020/2021 declaration of interests from the Divisional Commissioner of Crime Intelligence.
8. The purpose of this letter, besides bringing to your attention the possibility of unlawful conduct by members of the DPCI, is to enquire from you as we hereby do:
 - 8.1 If there is in fact an inquiry into our client and his affairs;
 - 8.2 If so:
 - 8.2.1 what does the inquiry pertain to;
 - 8.2.2 does the DPCI have a mandate to carry out this inquiry;
 - 8.2.3 why was our client not informed thereof.

9. Our client places on record that he is available and tenders his full cooperation into any lawful inquiry into him and his business affairs. If however any inquiry into our client or his affairs are unlawful, our client will take such action against such conduct with the full resources of the law that are available to him. Needless to say, any unlawful inquiry into our client will have serious repercussions for the parties involved and due particularly to the high-profile nature of the parties involved, any unlawful conduct by the DPCI would bring serious disrepute to the SAPS at a time when it certainly does not need it.
10. We look forward to hearing from you as per our request stated in paragraph 9 *supra* by close of business 1 July 2021.
11. All our client's rights are reserved.

Yours faithfully,

IAN LEVITT ATTORNEYS

PER: IAN LEVITT

SENT ELECTRONICALLY AND THEREFORE UNSIGNED