COMMISSION OF INQUIRY INTO CRIMINALITY, POLITICAL INTERFERENCE AND CORRUPTION IN THE CRIMINAL JUSTICE SYSTEM

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THE JUDICIAL COMMISSION OF INQUIRY

into Alleged Criminality, Political Interference and Corruption in the Criminal Justice System.

(“the Commission”)

SWORN SUBMISSION TO THE COMMISSION

BY

PAUL O’SULLIVAN

DATED THIS 17th DAY OF JUNE 2026

SWORN STATEMENT

I, the undersigned Paul Robert O'Sullivan, state under oath as follows: -

INTRODUCTION

I am an adult forensic investigator and the founder of Forensics for Justice. My abbreviated profile is attached as **ANNEXURE 'A'**.

This is a revised and shortened version of the draft submission made to the Commission in January 2026, and the submission made to parliament in February 2026.

This revised version will deal with the following subject areas: -

1.1 Penetration of the Criminal Justice System by Organised Crime is Not New

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1.3 Radovan Krejcir – General Mabasa and Colonel Steyn

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1.1 PENETRATION OF THE CRIMINAL JUSTICE SYSTEM BY ORGANISED CRIME IS NOT NEW

Despite General Mkhwanazi's dramatic press conference where he purported to blow the whistle on infiltration of the criminal justice system by organised crime, criminals have been able to successfully penetrate the criminal justice system, long before **6 July 2025**. There are many instances of such, and I will deal with some very well-known matters below. <u>The point needs to be clear;</u> This is not a new phenomenon! It has been going on for very many years. Not only is it not new, but it will also be my evidence that General Mkhwanazi has known about the links between organised crime and SAPS, for many years, it's not something he suddenly became aware of last year. I will also testify that one of the cornerstones of General Mkhwanazi's complaint; interference by the Minister of Police, is something that happened way back in 2011, at which time, General Mkhwanazi elected to unlawfully comply with said ministerial interference, in stark contrast to his 06 July 2025 public media complaint. By way of just one very historic example, in the late 1990's then KZN Provincial Head of SAPS' Organised Crime Unit, Senior Superintendent Piet Meyer, was protecting known criminals including drug traffickers and in 2002 was sentenced to ten years in Prison, after a Scorpions investigation, uncovered his links to the underworld. I knew about that case because I had also lodged a complaint against Senior Superintendent Meyer.

1.2 GLENN AGLIOTTI - COMMISSIONER JACKIE SELEBI

1.2.1 While General Mkhwanazi made widespread allegations about the capture of the entire criminal justice system by organised crime, the only evidence (as opposed to conjecture) that he produced, suggested that some high-ranking police officers may have been compromised by criminal networks.

1.2.2 The example of Senior Superintendent Meyer mentioned above, illustrates that there was nothing new about this phenomenon. Quite aside from the case of Senior Superintendent Meyer, it is common knowledge that we have had a National Commissioner of Police who was captured by organised crime. I refer in this regard to the case of the National Commissioner, Jackie Selebi and Mr Glen Agliotti, a case I am extremely knowledgeable about, as I was the complainant that exposed the corruption.

1.2.3 Mr Agliotti made his immoral living out of importing and exporting narcotics and counterfeit cigarettes. He often moved drugs and/or counterfeit cigarettes, with a police escort, arranged by a certain Captain Paul Stemmett. Captain Stemmet was not even a real police officer. He had been appointed by Commissioner Selebi, at Mr Agliotti's request. He was not even on the police's payroll system and had never undergone any police training or fitting out of uniform. He did not even know how to salute.

1.2.4 Mr Agliotti's other accomplices included security company owner, Mr Clinton Nassif. Mr Nassif also bribed Commissioner Selebi, so that he could expedite the issue of firearm licences for his security company. Mr Nassif later supplied the same firearm that was used to murder Mr Brett Kebble in September 2005. Commissioner Selebi interfered in

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the investigation, by allowing Mr Kebble's Mercedes, in which he was murdered, to be removed from Norwood Police Station by a brother-in-law of one of the murderers, to a car body workshop, where it was cleaned of all forensic trace evidence.

1.2.5 I spent over eight years investigating Commissioner Selebi, after he unlawfully had me removed from my position as head of aviation security at all state-owned civilian airports in South Africa. I was removed from ACSA because I had previously cancelled a R300 million security contract run by one of Selebi's friends and had also arrested Commissioner Selebi's friend, Mr Agliotti for importing counterfeit goods.

1.2.6 As a result of the unlawful conduct of Commissioner Selebi, I started an investigation in 2001, which ended in his prosecution in 2008, with conviction and sentencing in 2010.

1.2.7 In relation to the Selebi / Agliotti investigation, I must address a now redacted document that was unlawfully bandied around at the ad-hoc committee of parliament, unredacted, by Ms Dereleen James, an Action SA MP, in March 2026. The document is attached as **ANNEXURE 'B'**. Ms James refused to state where she had obtained same from, but it is clear that she has broken the law in publishing documents that name secret informers. She should be brought to justice for her conduct in obtaining unlawful access to classified documents and then abusing the cover of Parliamentary privilege to publish them to the country at large, thereby exposing a key witness to harm.

1.2.8 To explain the above payment, I disclose that I spent millions of Rand of my own money investigating Selebi, Agliotti, Nassif and the drug cartel they enabled. At one stage, I was asked by the Scorpions to cover the urgent costs of a certain witness's protection, pending them sorting out a permanent arrangement. I did this and requested repayment of some of the monies I had spent. The R100 000 to which the document refers was received by me in this regard and reimbursed only a tiny fraction of my expenses in assisting the criminal investigation that led to the successful prosecution of Commissioner Selebi and his many associates. I hold the opinion that Ms James and other members of the ad-hoc committee need to be brought to justice for their conduct, which clearly demonstrates unlawful access to classified documents, for nefarious reasons, or to advance their own hidden agenda.

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1.2.9 Ultimately, Messrs Agliotti, Nassif and many others were convicted of drug trafficking. Commissioner Selebi was convicted of six offences of corruption and defeating the ends of justice. One of the convictions, pertained to an inquiry from the UK's National Crime Agency, which requested intelligence on Agliotti. Agliotti testified at the corruption trial, that Selebi had provided him with a copy of the confidential enquiry from the UK, and secret e-mails of mine, which were found in his possession when the Scorpions executed a search warrant at his home. Given that Agliotti was convicted of drug trafficking and was known to also be involved in counterfeit goods and cigarettes, it means that his criminal syndicate had penetrated to the office of the national commissioner of police.

1.2.10 The facts of the capture of Commissioner Selebi by Mr Agliotti are well known. For present purposes I attach the following annexures in this regard:

1.2.10.1 **ANNEXURE 'B-1':** The first draft confession made by Mr Agliotti to the Scorpions in his attempt to obtain indemnity in return for implicating Commissioner Selebi;

1.2.10.2 **ANNEXURE 'B-2':** The judgment of the High Court on sentencing Commissioner Selebi;

1.2.10.3 **ANNEXURE 'B-3':** The judgment of the Supreme Court of Appeal dismissing the appeal of Commissioner Selebi against his sentence

1.3 RADOVAN KREJCIR – GENERAL MABASA and COLONEL STEYN

In this section, I will first give some background information on Krejcir. Then I will deal with senior police officials who were on Krejcir's payroll. I refer to the case of Krejcir for three reasons. First, it is another obvious example showing that the issue, of criminals infiltrating the police, ostensibly prompting the press conference of General Mkhwanazi is nothing new. Second, it involved multiple attempts on my life. Third, it involved a corrupt police officer who resurfaced as a witness at this Commission claiming the moral high ground in respect of other officers involved in the Aeroton drug bust.

BACKGROUND

1.3.1 One of the many public interest investigations I have carried out, was in respect of a gangster by the name of Mr Radovan Krejcir. Initially, I was not looking at Mr Krejcir at all. I was busy with a public interest investigation into human trafficking in the sex industry. My focus was on so-called *Gentleman's Clubs*, which were nothing more than strip-clubs. I had obtained *prima facie* evidence of human trafficking by Mr Lolly Jackson , who ran a chain of clubs under the style "*Teazers*".

1.3.2 I had personally ascertained Mr Jackson's *modus operandi* as being to arrange for young ladies, in the age range 18 to 25, to be brought into the country from Eastern Europe, to work at his clubs, serving drinks. Upon arrival, the girls would be placed at one of the houses owned by Mr Jackson, and their passports would be taken away from them. Each girl would be assigned a 'mentor', who would be other girls that had been working in the sex trade, at Teazers, for several years already.

1.3.3 It would then be explained to these girls, that they had to repay a large sum of money, before they could get their passports back. The sum would include the flight tickets and the exorbitant finder's fee, paid to an 'agent' in the country of origin. In addition, the girls would have to pay high rent for accommodation and work fees, to be able to work at the clubs. It soon became clear that the only way these girls could get out of the hole they were in, would be to strip-dance and offer sex to customers at the clubs to make money, so they could pay off their 'loans' and get their passports back. They would also be offered drugs, such as cocaine and heroin, which led them deeper into the hole. Jackson's operations ticked all the boxes for what is defined as "*human trafficking*".

1.3.4 In the course of the Teazers investigation, I found a witness, who was a bank manager with a Cypriot bank, who was engaged in money-laundering for Mr Jackson, but was by then very scared, as he had been threatened and assaulted by Mr Krejcir's people. Vast sums of money were involved. I took detailed statements from this man, which statements were supplied to the DPCI. This witness implicated Mr Krejcir, as one leg of the money-laundering triangle. I then added Mr Krejcir into the case, as one of the main persons of interest. I also discovered a link to a well-known underworld figure in the

Western Cape, by the name of Mr Cyril Beeka. Mr Beeka's main area of activity was running protection rackets in Cape Town, as well as trafficking in drugs and arms.

MR KREJCIR AND GENERAL MABASA

1.3.5 My investigations into the crime syndicate, started with Jackson in 2006. By 2009, the investigation had expanded to include Mr Krejcir and Mr Cyril Beeka. I shared the outputs of my investigation with then DPCI Gauteng Provincial Head, Major General Shadrack Sibiya. In late February 2010, about two weeks after the disappearance of a German businessman, Mr Uwe Gemballa , I received an unsolicited telephone call from Major General Joey Mabasa, the Gauteng provincial head of Crime Intelligence. He said he needed an urgent meeting with me. I met him at his offices in Diagonal Street, Johannesburg. He informed me that he had been tasked to go after Mr Krejcir and wanted as much information as I could give him. I provided General Mabasa with a large part of the information I had in relation to Mr Krejcir.

1.3.6 About one hour after leaving General Mabasa's office, I got a call from a source, who was familiar with Mr Krejcir's operations. The source informed me that Mr Krejcir was having lunch at the Harbour Restaurant at Bedford Centre, and he (the source) was one of a group of people sitting there. My source informed me that Mr Krejcir received a telephone call and, when he put the call down, he bragged that General Mabasa was on his way to see him, with a file he had obtained from Paul O'Sullivan and that O'Sullivan was so dumb, not to know that General Mabasa was on his payroll. I then investigated and discovered that General Mabasa's wife, Dorcas, and Mr Krejcir's wife Ms Katerina Krejcirova were, both co-directors of a company called Radlochron (Pty) Limited, since 2009-10-10. A company search in respect of Radlochron is attached as **ANNEXURE 'C'**. The registered address of the company is shown as 64 First Avenue, Edenvale. The following dates should be considered significant:

2009-10-10 The date Mr Krejcir acquired Radlochron (Pty) Limited, from a company warehouse, and appointed his own wife, Ms Katerina Krejcirova and General Masbasa's wife Ms Dorcas Maria Mabasa.

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It must have been in the minds of both Mr Krejcir and General Mabasa, that by having their wives as co-directors, it would never be picked up. They were wrong, because I did pick it up, and placed it in the public domain.

2010-06-30 The date Ms Dorcas Mabasa is shown as having resigned as a director. This took place soon after publication by the Mail & Guardian, of a story which exposed the link. I attach a copy of the Mail & Guardian media article dated **11 June 2011**, as **ANNEXURE 'D'**. I confess to giving information to the Mail & Guardian and other media, to keep the heat on police management.

At the trial of the murderers of Mr Gemballa, 64 First Avenue, Edenvale was shown to be the address where Mr Gemballa was held after kidnapping on 8 February 2010 and at which he was murdered on or about 18 February 2010. I note from the company records that Dorcas Mabasa resigned as a director, on 30 June 2010, which would have been soon after the first arrest of Radovan Krejcir and the murders of Mr Jackson and Mr Beeka, as well as the public exposure of the link, as seen in the media on 11 June 2011.

1.3.7 In early May 2010, Mr Lolly Jackson was murdered. General Mabasa was later at that crime scene as part of a conspiracy, to cover the fact that Mr Krejcir himself had murdered Jackson, in the presence of Mr George Louca, a.k.a. George Smith, **"Mr Smith"**. General Mabasa later dishonestly claimed that Mr Smith had called him to confess that he had shot Mr Jackson. A copy of an affidavit of Mr Smith is attached as **ANNEXURE 'E'**.

1.3.8 I later found further evidence of the corrupt relationship between General Mabasa and Mr Krejcir, including the details of the Toyota Hilux double cab, bought by Krejcir and supplied to General Mabasa. I handed over my evidence to General Sibiya and General Anwar Dramat of the DPCI. General Mabasa was then suspended from Crime Intelligence. However, he was never dismissed and was reported to have been offered special dispensations that enabled him to increase his pension payout by R3.5 million. I refer to an article published on News 24 at the time and attached as **ANNEXURE 'F'**.

1.3.9 In summary, I find it apposite to state that Mr Krejcir, because of his corrupt friends in the police, considered himself above the law, and therefore free to engage in any criminal

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activity he chose, including, but not limited to, murder. I should record that Krejcir has been sent to prison for 35 years and is still to be tried in respect of multiple attempts to murder me. In this regard, I refer to a sworn statement of a Mr Milosh Potiska, a one-time associate of Krejcir, attached hereto as **ANNEXURE 'G',** dealing with a conspiracy to murder me, and a further statement, attached as **ANNEXURE 'H'**, which explains in detail, his knowledge of the corrupt relationship between Mr Krejcir and General Mabasa. The ineluctable conclusion is that if Mr Krejcir did not have so many corrupt senior police officials on his payroll, I would not have had to take very costly evasive action to avoid multiple attempts on my life. I will later explain how, one of these assassination avoidance actions, was used by corrupt police officials, to unlawfully arrest and harass me.

MR KREJCIR & COLONEL STEYN

1.3.10 In early June 2011, I received a call from a friend of mine, who had previously been assisting me with surveillance on a house, where it was believed Mr Krejcir may be hiding. This surveillance was during March 2011, on the day when a 100-man team of DPCI, led by General Sibiya, went to arrest Mr Krejcir, as mentioned above. My friend, whose name must remain anonymous for his own safety, informed me as follows, using his words:-

> *"Paul, I got a call from Krejcir. He demanded that I come and see him at the Harbour Restaurant at the Bedford Centre. When I got there, I saw him sitting with Colonel Sambo, who was in full uniform. Krejcir told me to sit down facing him. He asked me why I had about 25 telephone calls with you, on the day the police raided his house. I asked how he knew that and he said he had your phone records. I lied and told him that I was trying to get you to buy a car from me, and the calls were negotiations about that. He leaned over the table and put his forefinger to my forehead and said "If I find out you are lying, I can put a bullet through your head right there". Sambo just sat there and kept quiet."*

Colonel Sambo was then the station commander of the Bedfordview Police Station.

1.3.11 I later established that the SAPS had been unlawfully obtaining my cellular phone records from Vodacom to monitor who I was communicating with in relation to my investigations into Mr Krejcir. The facts in this regard are set out in a founding affidavit that I prepared for an application to compel Vodacom to disclose the relevant details in this regard. A copy of that affidavit is attached hereto as **ANNEXURE 'J'**. At the time I prepared that affidavit, I suspected it was a corrupt police official but could not put my finger on a possible suspect.

1.3.12 However, in or about November 2013, I received a tip-off from the (now late) Warrant Officer Steenkamp of the DPCI, Organised Crime, in Germiston. Warrant Officer Steenkamp informed me that his boss, a Colonel Francois Steyn, had arranged for my telephone number to be unlawfully dropped into investigative Section 205's on very serious cases being investigated by DPCI Germiston, Organised Crime Investigation Unit, of which Col Steyn was the commander. This was done so that my cellular records could be unlawfully obtained from Vodacom and handed to Mr Krejcir by Col Steyn. Another source also provided information that there was a loan made by Mr Krejcir, to Col Steyn, which was paid into Steyn's mortgage bond account. The amount of the payment was stated to be R408,000.

1.3.13 These facts are recorded in an e-mail that I sent to Krejcir's attorney on **2013-11-21** and forwarded to General Sibiya and General Dramat, requesting Steyn to be criminally charged and fired. I attach a copy of the e-mail chain hereto as **ANNEXURE 'K'**. In that mail to General Sibiya, it will be seen that I have stated the following; *"As you will see, Col Francois Steyn admitted to a Mail & Guardian Journalist today….."* I use the expression, *"As you will see"* because I knew that the Mail & Guardian would run the story the following day, because I had involved them, in order to publicly expose Colonel Steyn.

1.3.14 A copy of the Mail and Guardian article referred to in the e-mail chain is attached as **ANNEXURE 'L'.** As appears from that article, Col Steyn admitted to receiving the loan in question but claimed not to have been aware that the company providing it was linked to Mr Krejcir. His story was not only feeble, but it could also not be reasonably possibly true.

1.3.15 Col Steyn inexplicably managed to avoid being charged criminally or even disciplined by the SAPS in relation to this misconduct. However, I was truly shocked when I saw him testifying at the Commission on **2026-05-11**, and claiming the moral high ground in relation to a dodgy drug bust that took place in Aeroton, Johannesburg. I could not believe that years ago, Colonel Steyn was working for a drug trafficker, and now he claims to be working against such people.

1.4 MAJOR GENERAL FEROZ KHAN

1.4.1 In or about April or May 2021, after a call to Forensics for Justice's whistleblowing line, I met an informer who provided very specific information concerning alleged criminal activity by General Khan. On **2021-05-24** I sent an e-mail reporting the information, to General Sithole, then Commissioner of Police, as well as to Lt General Lebeya, the Head of DPCI. A copy of my complaint is attached as **ANNEXURE 'M'**. My complaint raised allegations of General Khan's involvement with persons involved in the illegal tobacco trade. It also pointed out the extraordinary conflict of interests presented by General Khan's position as a director of multiple companies including two motor spares businesses while he was a General in crime intelligence:

> *"We find it should be impossible for a full-time Major General in the police, to be moonlighting as a director of 10 businesses and at least two of those businesses indicate a trade in spare car-parts, an activity diametrically opposed to the work of crime intelligence, given the high levels of vehicle crime in Gauteng."*

1.4.2 Nothing was done about my complaint. I am now informed by the Commission that, on 24 June 2021, General Khan shared with Mr Mohamed Sayed, a co-founder of the Carnilinks tobacco company that is regularly accused of evading its tax obligations, a letter that General Khan's attorneys addressed to the National Commissioner demanding details of any investigation by the DPCI, and threatening to take action against the DPCI in relation to my complaint. A copy of the letter sent by General Khan's attorneys to the National Commissioner, and shared by General Khan with Mr Sayed, is attached as **ANNEXURE 'N'**. I find it disconcerting, as well as ironic, that my complaint about General Khan's links to the illegal tobacco industry prompted him to send a lawyer's letter to the National Commissioner, which letter he shared with someone alleged to be part of the illegal tobacco industry. It demonstrates to me, the close proximity of a Major General in Crime Intelligence, and the allegedly illegal tobacco trade. I find it even more disconcerting that police management did nothing about my complaint, which I believe has become standard practice, in protecting corrupt police officers from sanction.

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1.4.3 On **2023-07-30**, I saw a news 24 article with the headline :

> ***"Top cop attending EFF gala a 'shameful, offensive' slap in face of South Africans - Public Interest SA"***

And with sub-headlines that directly raised the relationship of General Khan with Mr Sayed:

- ***"Public Interest SA described Major-General Feroz Khan's attendance at the EFF's gala dinner as shameful.***
- ***Khan's ticket was bought by Adriano's Mazzotti's business partner and Khan's close friend, Mohammadh Sayed"***

A copy of the article is attached as **ANNEXURE 'O'**

1.4.4 After reading the article, I decided to again raise the allegations I had made to General Sithole on 2021-05-24. Since General Sithole was no longer National Commissioner, I decided to place my complaint on record with then National Commissioner General Masemola. I therefore sent an e-mail to General Masemola on **2023-07-31**, the day after seeing the above story. A copy of my email to General Masemola, having seen the *EFF Gala Dinner* story is attached as **ANNEXURE 'P'**. To avoid repetitiveness and prolixity, I have not attached a full copy of my Annexure 'M', to Annexure 'P', but I can confirm it was all included with the e-mail to General Masemola. Thus far, I have received no feedback and seen no evidence that anything was done by General Masemola, or anyone else within SAPS in relation to my allegations. I remain of the view that this clearly demonstrates that successive police leaders look the other way, when they should be acting against corrupt officers, unless it suits their agenda to do something about it, then they take action very quickly, sometimes unlawfully quickly.

1.4.5 I'm not saying the action taken against General Sibiya was unlawful, and I don't say General Sibiya has done nothing wrong, as I have no knowledge of such matters. However, comparing the speed of his suspension, to the seven Crime Intelligence officers, who were NOT suspended, despite being charged with corruption, demonstrates different rules for different situations, which is morally reprehensible.

1.5 ERSTWHILE ACTING COMMISSIONER – LT GENERAL PHAHLANE

1.5.1 It is a matter of public record that between 2015 and 2017, I carried out extensive investigations and lodged various criminal complaints against General Phahlane with IPID. I supplied copies of my criminal complaint to then Deputy President of South Africa, now President, Cyril Ramaphosa. As a result of the complaints I made against General Phahlane, I was singled out for unlawful action, by corrupt police officials, at the instance of both General Phahlane and other senior officers. The crimes against me included; multiple arrests; multiple raids on my home and offices; kidnapping; torture; unlawful imprisonment; and multiple attempts at murder, by proxy. I was unlawfully arrested and detained, (over two years later) for using my Irish passport, to avoid being detected entering South Africa, at a time, when I had knowledge of Mr Krejcir's intention to have me murdered as soon as I entered the country. He had police at the airport in his pocket for such information.

1.5.2 I do not intend to labour this submission with the full details of the corrupt crimes I allege were carried out by General Phahlane, save to say, he was eventually arrested, charged and is facing multiple trials for corruption, with many other accused persons, some of them erstwhile generals in the police. The cumulative value of the corruption allegedly carried out by General Phahlane and his accomplices, exceeds R500 million and relates to procurement of police forensic goods and services, as well as crime scene management and evidence management software. One of the private parties who allegedly corrupted General Phahlane and who is on trial with him is Mr Inbanathan Kistiah, a serial corruptor, whom I will come back to later.

1.5.3 Following a detailed complaint from me, the DPCI judge issued a substantive report, which found the police had consistently violated my Constitutional rights, in its ongoing attacks against me, which lasted for four years and resulted in multiple raids on my offices, being arrested and dragged off a plane, and assaulted in front of my minor children, torture, and having to endure six criminal trials, consisting of trumped up charges. A copy of the DPCI Judge's Report, dated **2022-10-06** is attached as **ANNEXURE 'Q'**. I wish to record that I laid my complaint in July 2026, so the DPCI Judge report took six years to be issued.

1.5.4 To assist the Commission to remain focussed, it is best for me to give a brief explanation of the navigation of sections in the report.

1.5.4.1 Page 1 through 19 outlines in some detail, the nature of my complaint.

1.5.4.2 Page 20 through 38 is General Mokotedi's dishonest response to my complaint.

1.5.4.3 Page 40 through 48 is Colonel Hoosen's dishonest response to my complaint.

1.5.4.4 Pages 48 through 52 is the dishonest response of lower ranked police officers.

1.5.4.5 Pages 52 through 88 amounts to the DPCI Judge's assessment of evidence and findings against General Mokotedi.

1.5.5 I wish to draw attention to specific aspects of the DPCI Judge report, at paragraphs numbered; 22 on page 55; paragraph 26 on page 57; paragraph 30 on page 59; paragraph 35 on page 61, paragraph 45 on page 68 and the DPCI Judge's findings being paragraphs 59 through 64 on pages 74 and 75. The following very important extracts of paragraphs 59 through 64, which have never been made public, yet demonstrate the wholly egregious nature of the unlawful conduct of corrupt senior police officers insofar as they went to any lengths in desperately trying to silence me:

THE FOLLOWING FINDINGS AGAINST MAJOR GENERAL MOKOTEDI ARE MADE

59. *In respect of Mr O'Sullivan's arrest and the manner it was carried out at OR Tambo International Airport on 01 April 2016, in the presence of his children, needlessly detained for several days for what is a minor infraction of having allegedly contravened s26B of the South African Citizens Act and his dubious prosecution in* ***State v/s O'Sullivan: Case No B803/2016****, Kempton Park, for which he was acquitted in terms of s174 of the Criminal Procedure Act, 51 of 1977 (CPA),* ***Maj Gen Mokotedi is found Guilty*** *of having seriously and unlawfully infringed the rights of Mr O'Sullivan as contemplated in s17L(4)(a) of the SAPS Act, 68 of 1995.*

60. *As far as the cold cases against Mr O'Sullivan that Maj Gen Mokotedi unearthed and re-investigated are concerned is certainly permissible for the major general to have done so. What he has made himself guilty of is falsely claim under oath, as the DPCI Judge observes in para 26 (above) of this Report:*

61. *"(26) One has to be extremely gullible to accord any credence to Mokotedi's averment that pursuant to O'Sullivan's arrest on 01 April 2016 at OR Tambo International Airport all the complainants in the "cold cases" magically came out of the woodwork and urged that charges they laid against O'Sullivan years before be resuscitated or reopened. Such coincidence defies credulity and I reject his explanation as a figment of his fertile imagination. A conspectus of the facts and circumstances strongly militate against it."* *All nine re-investigated cases proved to have been moribund and none of them survived, as far as it could be determined. See paras 24 – 26 above.* **62.** *It is common cause that the relationship between O'Sullivan and Mokotedi was and remains strained, if not acrimonious. I am acutely alive to the fact that Mokotedi may have harboured an ulterior motive for re-opening the aforesaid cold cases. However, such motive in and of itself does not render the re-opening of the cases unlawful. See:* ***National Director of Public Prosecutions v Zuma (Mbeki and another intervening) 2009 (2) SA 277 (SCA)*** *at para 37 where the court held: "The motive behind the prosecution is irrelevant." However, I am satisfied that the re-investigation of the cases was meant to and did harass O'Sullivan. It was designed to have a chilling effect on his forensic investigations and to fight corruption. Sometimes, it appears, he acted unconventionally but so far, as the DPCI Judge could discern, not unlawfully.* **63.** ***To put Mr O'Sullivan to such unwarranted great expense to defend the unmeritorious cases was prejudicial to him and seriously and wrongfully infringed his constitutional rights as contemplated in s 17L(4)(a) of the SAPS Act, 68 of 1995.*** **64.** *The failure by Mokotedi to obtain a security clearance for almost three years is unlawful and a transgression of s 17E of the South African Police Service Act and s2A of the National Strategic Intelligence Act, No 39 of 1994. Mokotedi disgracefully tried to shield behind his employer. However, he had a concomitant duty and responsibility to obtain the clearance. In addition, his appointment (set out in para 44.2, (above)) was "subject to (b) a security clearance of Top Secret."*

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65. *Nevertheless, no direct connection can be made or line drawn between Mokotedi's spurious appointment as Provincial Head of the Hawks and the woeful treatment meted out to O'Sullivan. Be that as it may, he should never have been appointed to such a lofty position, least of all he should not have been given a permanent contract of employment under the sketched prevailing circumstances.*

1.5.6 The final and important reference to the DPCI Judge Report, is referred to as a "*Conclusion*" and can be seen on page pages 86/87, where it states: -

(A) This is an appropriate DPCI Judge's Report deserving the attention of the National Commissioner of Police, General Sehlahle Fannie Masemola, where Maj Gen Prince Mokotedi is currently based by virtue of what Section 205 (3) of the Constitution of the Republic of South Africa, 108, 1996, enjoins. The referral is also imperative in that Maj Gen Mokotedi has left the Hawks and is currently attached to SAPS (simpliciter). Section 205 (3), we are reminded reads:

"205 (3) The objects of the police service are to prevent, combat and investigate crime, to maintain public order, to protect and secure the inhabitants of the Republic and their property, and to uphold and enforce the law."

1.5.7 The relevance of the conclusion in the DPCI Judge's Report, mentioned above is not lost on me and should not be lost on the Commission. General Mokotedi, was never, from the date of his unlawful appointment, lawfully in his post. Instead of dismissing him, General Lebeya, unlawfully agreed with General Masemola, that he could simply be moved, from DPCI to SAPS. He was moved to the division known as the 'Inspectorate', which functions, or is supposed to function, as the internal standards monitoring of the police. It can be likened to hiring mice to guard the cheese.

1.5.8 Moreover, General Masemola did not lift a finger to implement the recommendations of the DPCI Judge. Such conduct by successive police leaders, merely begets a senior management structure that is top heavy with people of low ethics, or no ethics. It was only when I kicked up a fuss, that General Masemola eventually dismissed General Mokotedi, but not on anything to do with the guilty findings by the DPCI Judge.

GENERAL MKHWANAZI'S UNLAWFUL ASSISTANCE TO GENERAL PHAHLANE

1.5.9 Finally, with regards to General Phahlane, I am informed by that I do not need to go into details of the unlawful prosecutable conduct of General Mkhwanazi, pertaining to General Phahlane, relating to offences I believe were committed in 2017 and 2018, when General Mkhwanazi was involved in unlawful attempts to prevent the investigations and prosecution of General Phahlane. I will not therefore canvass the matter, save to say that I feel very strongly that the evidence of Mr Humbulani Khuba, in this regard, should be tested, as it will reveal the prosecutable and underhanded manner in which General Mkhwanazi attempted to derail the criminal case against General Phahlane.

1.6 GENERAL MKHWANAZI, MR KISTIAH & THE LOUIS VUITTON BAGS

1.6.1 As pointed out earlier, Mr Inbanathan Kistiah is currently on trial with former Acting National Commissioner, General Phahlane, and several other senior SAPS officers on charges of fraud and corruption in relation to a SAPS contract.

1.6.2 Mr Kistiah is also alleged to have gifted expensive Louis Vuitton Bags to General Mkhwanazi and General Masemola as a gratification in return for the appointment of his company, I-View Integrated Systems to provide apparently overpriced (5 times actual price) high visibility bullet proof vests to SAPS. The first I heard of this, was when I read about it in the media. In this regard I refer to the attached article **ANNEXURE 'R'**, which was posted on the Sunday World website on **2022-11-06**. However, I was able to later confirm the allegations from a source. It seems a female brigadier was on the trip to Europe and also received a bag, which she then handed to IDAC.

1.6.3 After, I was sued by Mkhwanazi, in November 2026, in a futile attempt to silence me, for making public allegations of corruption by him, I served a *subpoena duces tecum*, on IDAC, to obtain copies of the relevant documentation. Although IDAC refused to supply what was requested in my subpoena, they did unwittingly confirm that the case was still an active investigation.

The wording in IDAC's response stated: -

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"These are criminal matters that remain active and IDAC cannot share any of the information and/or documentation requested in paragraphs 1-4 of the subpoena."

A copy of my subpoena and IDAC response are attached as **ANNEXURES 'S-1' and 'S-2'** respectively. The Brigadier I believe to be female Brigadier Leonie (Helena) Ras.

1.6.4 I cannot assume that IDAC lied in response to my subpoena. Accordingly, I have to believe that that there is an IDAC investigation into the provision of Louis Vuitton bags to General Mkhwanazi and General Masemola by a SAPS supplier currently standing trial on charges of corrupt conduct in relation to SAPS contracts as reported in Annexure 'R'.

1.6.5 General Mkhwanazi's own conduct pertaining to the allegations that he received a Louis Vuitton bag is, itself, highly suspicious. Whilst testifying at the Commission, and without the Louis Vuitton bags being mentioned, he volunteered the following after defaming me; "*At least my wife now knows what a Louis Vuitton bag is valued at.*", or words to that effect. He does not dispute that the German trip was in relation to a contract with Mr Kistiah who is currently standing trial on corruption charges relating to SAPS contracts and, after failing to deny receipt of the Louis Vuitton Bag, from Mr Kistiah in his evidence before Parliament and before the Commission last year, he only belatedly did so in his last appearance before Parliament in March this year.

1.7 GENERAL MKHWANAZI, POLITICAL PRESSURE AND LT GEN RICHARD MDLULI

1.7.1 The two central themes of General Mkhwanazi's press conference of 6 July 2025 were organised crime's infiltration of the criminal justice system and political interference in the SAPS by the Minister of Police. The examples cited above show that organised crime's infiltration of the criminal justice system in 2025 was definitely nothing new and has been going on for decades. Nor was political interference in the SAPS new. The irony of the latter fact is that, during his period as acting National Commissioner in 2012, General Mkhwanazi himself turned a blind eye to unlawful political interference relating to the then Divisional Commissioner of Crime Intelligence, Lt Gen Richard Mdluli. In fact, General Mkhwanazi not only turned a blind eye, but he also acquiesced to patently unlawful instructions, then later helped cover it up.

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1.7.2 Many of the basic facts of this case are undisputed and are admitted by General Mkhwanazi in his witness statement to the Commission that attaches the affidavit he submitted to the State Capture Commission. The affidavit to the State Capture Commission is attached as **ANNEXURE 'T'** The common cause facts are the following:

1.7.2.2 General Mdluli appears to have enjoyed special protection under the administration of former President Zuma.

1.7.2.3 General Mkhwanazi's appointment by President Zuma as Acting National Commissioner, raised eyebrows. At the time, General Mkhwanazi was a Major General and only 38 years of age. He was first promoted to Lt General and then leap-frogged many senior Lt Generals to become acting Commissioner, having many generals who were his senior, overnight becoming his junior.

1.7.2.4 When General Mkhwanazi was appointed Acting National Commissioner in October 2011, upon the suspension of Commissioner Cele, General Mdluli was already on suspension and facing criminal charges in two separate matters. The first involved a murder charge, with related kidnapping and assault charges and the second concerned fraud and corruption relating to the Secret Service Account.

1.7.2.5 SAPS disciplinary charges had been instituted against General Mdluli, by Commissioner Cele, in relation to the murder, kidnapping and assault charges but not the fraud charges. After a DPCI investigation into the fraud and corruption allegations, involving the Secret Service Account, which I refer to as a slush fund, criminal and disciplinary charges were also instituted against General Mdluli in this regard.

1.7.2.6 The NPA then unlawfully withdrew; first the fraud and corruption charges and then the murder, kidnapping and assault charges against General Mdluli. The unlawfulness of these decisions of the NPA was established by the High Court and confirmed by the Supreme Court of Appeal in a review application brought by Freedom Under Law. Copies of the High Court judgement dated

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2013-09-23 and Supreme Court of Appeal judgment dated 2014-04-17 are attached as **ANNEXURES 'U' and 'V'**. I request permission to read into the record, highlighted sections of paragraphs 203 through 221, of Annexure 'U'.

1.7.2.7 Following the unlawful withdrawal of the murder, kidnapping and assault charges against General Mdluli, General Mkhwanazi took an unlawful decision to withdraw the SAPS disciplinary proceedings against him, which he did on 29 February 2012. However, General Mdluli remained on suspension for a further few days.

1.7.2.8 Under pressure from the Presidency, the Inspector General of Intelligence's office took a succession of contradictory steps in relation to the criminal proceedings against General Mdluli. First, on 8 March 2012, the Inspector General issued an opinion recommending that all disciplinary proceedings against General Mdluli should be withdrawn. She did so, without considering the contents of the criminal dockets against General Mdluli, and for the spurious reason that the allegedly partisan nature of the investigation against General Mdluli, voided that investigation. Then, on 19 March 2012, having considered the contents of the criminal dockets, the Inspector General withdrew the 8 March 2012 opinion and the recommendation. Finally, under pressure from the Minister of Police at a meeting to which he called the Inspector General and General Mkhwanazi, the Inspector General reinstated the opinion and the recommendation. I cannot think of a more blatant demonstration of unlawful executive overreach.

1.7.2.9 At the meeting with Minister Mthethwa and the Inspector General of Intelligence, the Minister instructed General Mkhwanazi to uplift the suspension of General Mdluli. General Mkhwanazi later claims to have informed Minister Mthethwa at the meeting that his instruction was illegal. Nevertheless, he acquiesced. General Mkhwanazi has always been deliberately vague about the dates and times of such meetings. Given the importance of same, there can be no legitimate reason for vagueness.

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1.7.2.10 Following the meeting with the Minister of Police and the unlawful reinstatement of the Inspector General's opinion, General Mkhwanazi uplifted the suspension of General Mdluli on 27 March 2012 and he returned to work, where he was also handed the additional responsibility of Protecting the President and Ministers.

1.7.2.11 On 15 May 2021, after the Freedom Under Law urgent application was launched, new disciplinary proceedings were instituted against General Mdluli and on 25 May 2012, General Mkhwanazi recanted his earlier decision and suspended General Mdluli again. Public pressure was building.

1.7.2.12 At the start of June, General Mkhwanazi met with President Zuma and appears to have been pressurised to withdraw the new disciplinary proceedings against General Mdluli and his suspension. At the meeting, it was agreed that General Mkhwanazi would not continue as Acting National Commissioner beyond the few remaining weeks that were required to appoint a new National Commissioner. General Phiyega, with zero policing experience, was duly appointed on 12 June 2012.

1.7.2.13 Shortly after her appointment, General Phiyega instructed General Mkhwanazi to return to his home in KwaZulu Natal and informed him that she would call him if she needed him for any work purposes. For most of the next two years, General Mkhwanazi drew his full salary and benefits without performing any tangible work, because General Phiyega did not assign any duties to him.

1.7.2.14 General Mdluli was able to delay his criminal and disciplinary proceedings until after he retired with a generous pension in 2018.

1.7.2.15 General Mdluli was ultimately convicted and sentenced to imprisonment for five years for kidnapping and assault in 2020.

1.7.2.16 General Mdluli has not yet been tried for the fraud, theft and corruption charges.

1.7.3 On its own terms, the narrative of General Mkhwanazi shows that he readily succumbed to political pressure and implemented the illegal instruction of the Minister to uplift the suspension of General Mdluli, whilst at all material times knowing that this instruction was illegal.

1.7.4 In fact, when regard is had to the facts of the Freedom Under Law application, General Mkhwanazi's collusion with the illegal interference of the Minister and the President is even more stark. The chronology of the Freedom Under Law matter is the following:

1.7.4.2 While General Mkhwanazi was still Acting National Commissioner, Freedom Under Law instituted an urgent application to interdict General Mdluli from performing any SAPS functions pending an application to review and set aside the decisions of the NPA and General Mkhwanazi to withdraw the prosecution against him, and the disciplinary proceedings against him

1.7.4.3 The urgent application was heard on 5 and 6 June 2012 and resulted in an order issued by Makgoba J, interdicting General Mdluli from performing any police functions pending finalisation of the review application in Part B of the proceedings.

1.7.4.4 On 23 September 2013 the High Court upheld the review application in Part B and set aside the decisions of the NPA to withdraw the prosecution against General Mdluli and of General Mkhwanazi to withdraw the disciplinary proceedings against General Mdluli.

1.7.4.5 In its judgment of 17 April 2014, the Supreme Court of Appeal confirmed the orders of the High Court reviewing and setting aside the decisions of the NPA and General Mkhwanazi.

1.7.5 There are two noticeable aspects of General Mkhwanazi's conduct in relation to the Freedom Under Law litigation that show he assisted to cover up the executive interference in the SAPS, which he knew to be unlawful.

1.7.5.2 First, in the face of the founding affidavit from Freedom Under Law that specifically alleged executive interference in an attempt to pressurise him to

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withdraw the disciplinary action against General Mdluli and his suspension, General Mkhwanazi did not admit the relevant facts. Instead, he deposed to an affidavit which did not respond to the allegations but nevertheless opposed (on spurious grounds) the urgent interdict sought to prevent General Mdluli from executing police functions pending finalisation of Part B (see paragraph 49 of the SCA judgment and paragraph 211 of the High Court judgment); I regret I can no longer find General Mkhwanazi's answering affidavit.

1.7.5.3 Second, he appears to have colluded in allowing SAPS to put up a dishonest version in their answering affidavit to Part B where then Commissioner Phiyega falsely stated that there had been no instructions to General Mkhwanazi from above (see paragraph 209 of the High Court judgment). In the face of a clear attempt by General Phiyega to mislead the Court, General Mkhwanazi failed to set the record straight.

1.7.6 In contrast, General Mkhwanazi claims in his affidavit to the State Capture Commission that he was completely unaware of the contents of General Phiyega's affidavit because he was in his (apparently enforced) period of rest at home in KwaZulu Natal at the time. I find this claim unconvincing because:

1.7.6.2 General Mkhwanazi was aware of the allegations in the FUL application because the founding affidavit in the urgent application had been served on SAPS while he was Acting National Commissioner and he had deposed to the initial answer in that application, but chose to side-step the unlawful instruction allegation, and simply not comment. General Mkhwanazi therefore knew that the allegation of an unlawful instruction to him was at the centre of the application and the reply from General Phiyega would have to admit to that central allegation, if she was not going to perjure herself.

1.7.6.3 The FUL proceedings were a matter of widespread news coverage and the specific issue of General Phiyega's denial that General Mkhwanazi had been pressurised from above was, itself, covered extensively. Even if General

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Mkhwanazi was not aware of the news coverage himself, it is inconceivable that none of his close colleagues in the police would have drawn General Phiyega's denial to his attention.

1.7.7 In any event, whatever General Mkhwanazi may or may not have known in relation to what was attributed to him in the SAPS answering affidavit, he was well aware of what was said in the founding affidavit in the urgent application, yet he chose not to disclose that he had been subjected to illegal pressure to terminate the suspension of General Mdluli. Such failure to disclose, could be read as an intention to deceive the court, or cover up the instructions from above. It may even amount to the prosecutable offence of defeating the ends of justice, which is a very serious offence.

1.7.8 Moreover, by 2015, General Mkhwanazi was aware of what was contained in the FUL papers because he lodged a complaint of perjury against General Phiyega for her answering affidavit in those proceedings. General Mkhwanazi's complaint of perjury was widely reported at the time. Significantly, however, it did not relate to the issue of political interference in his decisions, but rather to the less controversial issue of what he had informed General Phiyega about the role he played in the disciplinary processes and the fact that he was not asked to furnish a confirmatory affidavit in the FUL proceedings. I attach in this regard, a copy of the presentation made by the Minister of Police to Parliament on 13 November 2015 as **ANNEXURE 'W'**. The complaint of General Mkhwanazi and the finding in relation thereto appear at page 14 of the document, which I have extracted for ease of reading, it states the following:

Lt General Mkhwanazi lodged a grievance against the National Commissioner for lodging false affidavits in court regarding Lt General Mdluli's case. Contrary to the National Commissioners affidavit, Lt General Mkhwanazi alleges that he was not consulted by the National Commissioner to submit confirmatory affidavit in the case of Lt Gen Mdluli and Freedom Under Law.

- *Lt Gen Mkhwanazi had informed the National Commissioner about the initiation of disciplinary steps against Lt Gen Mdluli, however to his surprise, the National*

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Commissioner told Court such steps were not initiated by him and the Court found that there was a dereliction of duty by Lt General Mkhwanazi.

FINDING

- *The national commissioner informed the Court wrongly with regard to Lt General Mkhwanazi actions on Mdluli matter as well as his availability for submitting to Court confirmatory affidavit.*
- *The National Commissioner could have been truthful to Court and could have taken appropriate action.*

RECOMMENDATION

- *The National Commissioner committed a criminal act of perjury and misconduct by bringing the SAPS into disrepute.*

1.7.9 Accordingly, even after he was fully aware of the contents of General Phiyega's affidavits in the FUL proceedings, General Mkhwanazi continued to cover up the illegal instruction he had been given by Minister Mthethwa and the political interference of both Minister Mthethwa and President Zuma in decisions that he ought to have been able to take, free of any political interference. He could have at that time, and indeed should have, approached the court with the truth. He failed to do so. He only finally came (partly) clean when he was interviewed by the investigators at the State Capture Commission, led by Justice Zondo, even then, his version was a cover up of the truth and he fobbed them off, by blaming others.

1.7.10 Given General Mkhwanazi's own collusion, in an illegal process of political interference designed to keep General Mdluli in charge of the Division of Crime Intelligence and its regularly stolen secret funds, it is difficult to take seriously his complaints of political interference that he made in his infamous speech on 6 July 2025. In fact, General Mkhwanazi's own unlawful conduct in 2011/12 make the current complaint he has made, pale into insignificance, whilst still sharing commonalities. For example, in 2011/12 General Mkhwanazi's conduct was intended to unlawfully protect crime intelligence divisional head, much the same as his conduct in 2025, is intended to protect the crime intelligence divisional head and those under him.

1.8 JULY 2026 MEDIA CONFERENCE – WAS IT A SMOKESCREEN TO PROTECT CRIMINALS?

1.8.1 In my detailed submission to the ad-hoc committee of parliament, I made the allegation that the epicentre of crime in the police, is the Crime Intelligence Slush Fund. I stand firmly behind that assertion. In 2012, when General Mkhwanazi was acting commissioner, the slush fund budget stood at R98m per annum. By 2024, this budget had increased to R600m per annum. That's an increase of 512%. That's five-times the rate of inflation, with no concomitant decrease in organised crime. In fact, theft of slush funds has increased, year on year, with the budget being increased to meet the theft.

1.8.2 On **2025-06-26**, Lt General Khumalo, was charged together with Major General Philani Lushaba (CFO at Crime Intelligence), Major General Nosipho Precious Madondo (Component Head of Intelligence Analysis and Co-ordination), Major General Josias Lekalakala (Gauteng Provincial Head: Crime Intelligence), Major General Zwelithini Gabela (Technical Management Services), Brigadier Phindile Ncube (Section Head: Personnel Security – Vetting and Brigadier Dineo Mokwele, hereinafter referred to as **"the Crime Intelligence Seven"**.

1.8.3 Their charges relate to the irregular employment of Ms Mokwele in a senior ranking position of Brigadier in the Technical Support Services of Crime Intelligence. This relates back to a case I reported against Brigadier Dineo Mokwele and General Khumalo on 05 January 2025, having investigated same since November 2024. I reported the complaint to IDAC, Lt General Sibiya and copied the Minister of Police, Mchunu. I do not believe I was alone in reporting the matter, even if I was first, as I also published it widely in January 2025, to ensure the matter would not be swept under the carpet.

1.8.4 After the Crime Intelligence Seven were arrested and charged on **2025-06-27**, I caused the attorney of Forensics for Justice, to send a harshly worded letter to General Masemola, dated **2025-07-01**. That same evening, General Masemola replied to FFJ's attorney, with a duff response which seems to have been calculated to make it impossible to launch an urgent application against him, to have the Crime Intelligence Seven suspended.

1.8.5 I attach copies of the two letters as **ANNEXURE 'X-1'** and **ANNEXURE 'X-2'**.

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1.8.6 It was clear by that stage, that General Masemola was intentionally protecting the Crime Intelligence Seven. I therefore sent a harshly worded e-mail directly to General Masemola, on **2025-07-05**, after having received a tip-off from a confidential source, that he had been engaged in a two-day secret meeting with General Mkhwanazi, which I kept quiet about. Although I knew about a secret meeting between Generals Mkhwanazi and Masemola, at that stage I had no idea of the next day's planned media briefing, which I now describe as a Smoke Screen. I refer to **ANNEXURE 'Y'**, being a true copy of my 2025-07-05 mail to General Masemola. Despite posing some very difficult questions, General Masemola merely ignored the mail, again proving that he has something to hide, over and above his unlawful protection of the Crime Intelligence Seven.

1.8.7 I deal with the secret meeting between Generals Mkhwanazi and Masemola, below.

1.8.8 General Masemola, was not alone in his protection of the Crime Intelligence Seven. I had been reliably informed that Generals Mkhwanazi and Masemola engaged in a secret strategic planning meeting, at the Pretoria Police Training Centre, which started on **2025-07-03** in the evening and ended early on **2025-07-04**. By the time the meeting had ended, the following was clear:

1.8.8.2 General Mkhwanazi was to call an urgent media briefing, back on his home turf of KZN, in order to shock the nation and lay down a smoke screen that would be used to distract public attention away from the Crime Intelligence Seven, by claiming at the media conference that he, General Mkhwanazi, was now a whistle blower and was acting alone in exposing ongoing corruption between police officials and criminals. However, as previously stated, the ongoing corruption between criminals and the police is not a new phenomenon, it has been going on for decades.

1.8.8.3 To add some excitement to his media conference, General Mkhwanazi surrounded himself with balaclava clad police officials, heavily armed and looking like they were ready for war. General Mkhwanazi himself, dressed

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up in combat uniform of the police's Task Force Unit, even though he ceased to be a member of that unit many years before.

1.8.9 In my submission to the ad-hoc committee, which was ignored by them, I pointed out that the PowerPoint presentation used by Mkhwanazi, had meta data, which showed it had been created on a SAPS computer, which is NOT Mkhwanazi's computer. It would be wise for the Commission to establish the user of said computer and who typed and where they typed, the presentation to the media. At the media conference, journalists asked for copies of the presentation, so it was pdf'd and sent to the journalists, there and then. One of the journalists, forwarded it to me. I could therefore forensically examine the file and look for the meta data.

The meta data is as follows:

```
Producer          : Microsoft┬« PowerPoint┬« for Microsoft 365
Title             : PowerPoint Presentation
Creator           : saps731043
Creator Tool      : Microsoft┬« PowerPoint┬« for Microsoft 365
Create Date       : 2025:07:06 12:02:54+02:00
Modify Date       : 2025:07:06 12:02:54+02:00
Document ID       : uuid:79940BF2-9738-466B-86CB-F74A979B2EC7
Instance ID       : uuid:79940BF2-9738-466B-86CB-F74A979B2EC7
Author            : saps731043
```

1.8.10 I believe it is in the public interest for the computer user's details, to be obtained and the person interviewed to establish who instructed him/her, what he/she was instructed and where and when he/she typed out the presentation.

1.8.11 What is of importance is, despite my attorney having written to General Masemola on 2025-07-01 and my email to General Masemola of 2025-07-05, it is clear that Generals Masemola and Mkhwanazi had privately discussed my involvement in trying to have the Crime Intelligence Seven, suspended. As evidence of this allegation, I refer to **ANNEXURE 'Z'**, attached hereto. Annexure 'Z' is a transcription of the media briefing by General Mkhwanazi on 6 July. I refer to the following extract from page 24 of Annexure 'Z', which proves General Mkhwanazi could only be referring to me.

"That's why there's a call in public from a person that I will not necessarily mention his name, that the national commissioner must bypass the disciplinary regulations

of the service, must simply suspend these people because they are [inaudible] [0:59:25.4]. Why is that call? It's a call that is putting more pressure, to make sure that the country, hence, the handing over to the criminal syndicate. That's what it's about."

1.8.12 For General Mkhwanazi to have uttered the above words, he must have been discussing the annexes attached hereto as Annexure 'X-1', Annexure 'X-2' and Annexure 'Y', with General Masemola and therefore to have been very aware of my demand for the suspension of the Crime Intelligence Seven. Since the above discussion must have taken place between General Masemola and General Mkhwanazi, it follows that the 6 July Media briefing was nothing more than a well-orchestrated smokescreen, aimed at protecting the Crime Intelligence Seven, with the common denominator, or perhaps the motive, being the easy accessibility of the crime intelligence Slush Funds. The said slush funds were not only easily accessible for personal gain, but the funds also allow criminal enterprises within the police, to operate below the radar, and with no accountability. Much has been said in public about the so-called PKTT members staying in five-star hotels and driving fancy cars. Where does the cash come from?

I confirm that I know and understand the contents of this statement, that I have no objection to taking the prescribed oath, and that I consider the prescribed oath binding on my conscience.

PAUL O'SULLIVAN

I certify that the deponent has acknowledged that he knows and understands the contents of this statement which was sworn to before me, and the deponent's signature was placed thereon in my presence at GALLO ~~MANOR,~~ **JOHANNESBURG** on this **SEVENTEENTH** Day of **JUNE 2026**

COMMISSIONER OF OATHS

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