

## SWORN STATEMENT

I, the undersigned Robert John McBride ID No. 630706 5082 086 state under oath as follows:

1

I am, since March 2014, a civil servant and the Executive Director of the Independent Police Investigative Directorate 'IPID', previously known as the 'ICD'. This statement relates to various criminal cases opened by a certain Mr Paul O'Sullivan 'O'Sullivan' at either the ICD or its successor, the IPID.

### COMMISSIONER JS SELEBI 'Selebi'

2

There can be no doubt that Selebi's conviction and 15 year prison sentence, was the end result of many years of hard work and the doggedness and determination of O'Sullivan. His role was pivotal.

### LT GENERAL V MOONOO 'Moonoo'

3

In and during 2014 and 2015, O'Sullivan laid serious criminal complaints with IPID against Lt General Vinesh Moonoo, who at that time was the Divisional Commissioner Detective Services. The complaints of O'Sullivan related to various alleged corrupt activities of Moonoo and in respect of certain questionable characters, who appear to have strong connections with the underworld. One of the few remaining items that delayed our investigation was the steadfast refusal of Moonoo to hand over certain dockets, which had become 'seized' by his office. Despite repeated requests from the IPID, Moonoo refused to cooperate with our investigations. Moonoo effectively stymied the investigations. I raised the issue of Moonoo's stifling with both General Phiyega and General Sithole. I seem to think we may have had to resort to issuing Section 205 subpoena's to compel handing over of the dockets in question, but I do not recall what the outcome was.

### MAJOR GENERAL MB NTLEMEZA 'Ntlemeza' (now Lt General)

4

In and during early 2015, O'Sullivan spent several days interviewing and gathering evidence against then acting head of Hawks, Major General Ntlemeza, and caused the opening of a docket against him, with IPID. At the time I was unlawfully suspended on 25 March 2015 I had satisfied myself that Ntlemeza had a case to answer, but that there were a few more things outstanding, before we could bring the matter to finality. In January 2015, I met with the Minister of Police Nkosinathi Nhleko at his home in the Ministerial village and briefed him about the cases pertaining to Ntlemeza. I should mention that the Minister has since conceded that my suspension was unconstitutional.

### OTHER CASES

5

O'Sullivan supplied a multitude of other sworn statements and evidence of payments to various police officials, that he managed to obtain, that implicated a whole host of police officials in Johannesburg, between the ranks of Captain and Colonel, in what can best be described as 'systemic and institutionalised corruption' that appears to have permeated the police service. These cases pertained to an alleged tax-fraud of a certain Edrees Hathurani. I have no doubt that no other citizen, of his own volition, has taken the time and energy to raise complaints about corruption in the police in the same manner that O'Sullivan has.



**FAILURE TO BRING TO CONCLUSION**

6

Since my unlawful suspension, along with junior colleagues at IPID, I am aware that most, if not all of the investigations mentioned above have ground to a halt. The persons of interest in those investigations appear to have mounted a fight-back strategy, which includes the bringing of false criminal charges against myself and my subordinates. As a result, the increase in criminality of the police is unavoidable. I also note, that the prosecutor in the false charges against myself and my subordinates is Adv Sello Maema, the same prosecutor with the O'Sullivan's matters.

7

I cannot rule out a link, between the cases opened by O'Sullivan with IPID, the investigations carried out by IPID, my suspension and false criminal charges, and the criminal charges brought against O'Sullivan.

Prior to me signing this statement, I have carefully read through it and am satisfied that the facts are correctly and accurately recorded. The following questions were put to me in person by the commissioner of oaths and I entered the answers thereto in my own handwriting:

'Do you know and understand the contents of this statement?'

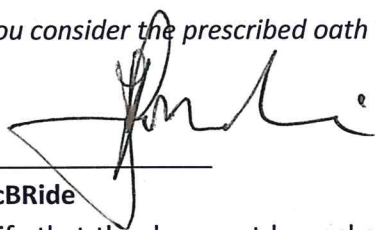
Y

'Do you have any objection to taking the prescribed oath?'

N

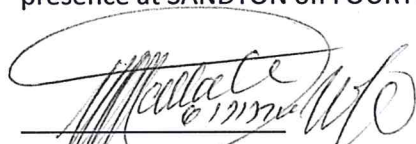
'Do you consider the prescribed oath binding on your conscience?'

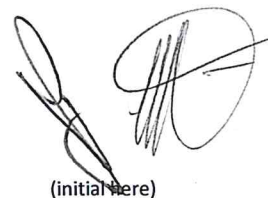
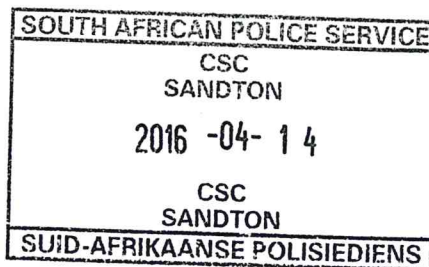
Y



RJ McBride

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 deponents signature was placed thereon in my presence at SANDTON on FOURTEENTH day of April 2016

  
Commissioner of Oaths  
Methelo Methelo  
W/O  
5115 Sandton



(initial here)