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IN THE CONSTITUTIONAL COURT OF SOUTH AFRICA

Case No: CCT52/21

In the matter between:

JACOB GEDLEYIHLEKISA ZUMA	Applicant
and	
THE COMMISSION OF INQUIRY INTO STATE CAPTURE, FRAUD AND CORRUPTION IN THE PUBLIC SECTOR, INCLUDING ORGANS OF STATE	First Respondent
RAYMOND MNYAMEZELI ZONDO NO.	Second Respondent
THE MINISTER OF POLICE	Third Respondent
MINISTER OF JUSTICE AND CORRECTIONAL SERVICES	Fourth Respondent

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FILING SHEET

Filing of Applicants' Replying Affidavit.

DATED AT JOHANNESBURG ON THIS THE 7TH DAY OF JULY 2021.

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APPLICANT'S COMPOSITE REPLYING AFFIDAVIT

I, the undersigned,

GEDLEYIHLEKISA JACOB ZUMA

do make oath and state:

1. I am the former President of the Republic of South Africa, residing in the village of Kwa-Nxamalala at Nkandla. I deposed to a founding affidavit in this application and as such am authorised to depose to this replying affidavit.

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2. The facts contained in this affidavit are, unless the contrary appears from the context or is so stated, within my own knowledge and are true and correct. The facts of which I do not have personal knowledge are to the best of my knowledge and belief both true and correct. Where I make submissions of a legal nature, I do so on the strength of legal advice which my legal advisers have provided to me.

3. I have read the answering affidavits filed on behalf of the Commission, the Acting Chief Justice and the HSF (respectively 1st, 2nd and 5th respondents). I wish to respond thereto as set out hereunder. Due to the urgency of the matter and to avoid unnecessary prolixity, I wish to deal in this single composite replying affidavit with all three answering affidavits.

4. For the same reasons, I will only do an *ad seriatim* traversal of the HSF affidavit and only deal with the Commission's affidavit in more general and broader terms. This is partly because the HSF affidavit was received earlier and also due to the many overlaps in the factual and legal issues raised in both affidavits.

5. For the record, I stand by my founding affidavit and will therefore try to resist the temptation to repeat the averments detailed therein. That said, any allegations which are not specifically dealt with hereunder must be taken as having been denied insofar as they are in conflict with my version as contained in this and my founding affidavit.

6. Before dealing with the HSF affidavit, I wish to make a few general remarks, which are directed at the Commission's affidavit but are also of application to my application as a whole.

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COMMISSION'S RESPONSE: THE AFFIDAVIT OF PROF MOSALA

7. The themes which run through the Commission's report may be summed up and listed as follows:

7.1. Voluntary non-participation;

7.2. Election and/or waiver;

7.3. The meaning of *"with such modifications as are necessary"* in Rule 29;

7.4. The requirements of Rule 42 have not been met; and

7.5. Selected constitutional errors and/or omissions.

Voluntary non-participation

8. The binding theme of the issues or defences raised by the Commission is the idea and refrain that I deliberately chose not to participate in the relevant court proceedings and that I am thereby automatically disentitled to bring the present application. I dispute this assertion.

9. I have never denied that I took a conscious and deliberate decision not to oppose the Constitutional Court contempt application for the reasons articulated in the founding affidavit, but also as a form of protest and conscientious objection against perceived abuse and bias.

10. I have been at pains to point out that I was not in wilful and/or *bona fide* contempt of court. I stand firmly by this assertion, which will be further elaborated upon during legal argument.

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11. However, the thrust of this application is that even if I were to be found guilty of contempt and convicted, the orders which have been made in respect of my direct imprisonment are still liable to be rescinded, varied and/or reconsidered in terms of Rule 42 and/or the common law, as pleaded.

12. I therefore reject the notion that simply because my non-participation was voluntary, that fact would *ipso facto* non-suit me in the present application, even if there are rescindable errors and omissions established.

Election / Waiver

13. Closely aligned to the above is the Commission's notion that due to my conscious and/or voluntary non-participation and the election not to participate, I have somehow waived my constitutional rights, which form the backbone of the present application.

14. I am advised that it will be argued that my constitutional rights cannot be waived, either at all or in the present circumstances of this matter.

Rule 29 "modifications"

15. I am further advised that it will be argued that the words *"with such modifications as are necessary"*, contained in Rule 29, must be given the meaning that, in addition to the usual considerations set out in Rule 42, a specific brand of rescindable errors and omissions, which will be termed "*constitutional errors and/or omissions*", need to be distilled.

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The requirements of Rule 42 have not been met

16. It is this section which lies at the core of this replying affidavit and which will characterise the mainstay of legal arguments to be made on my behalf.

17. My departure point will be to seek to define the notions of rescindable errors and/or rescindable omissions. This is due to my steadfast belief that the respondents have totally missed the essence of my application, which is partially but certainly not totally in agreement with the minority judgment.

18. I am advised that the abovementioned legal terms will be defined in contradistinction to appealable errors. This is important because the respondents have all incorrectly characterised my application as a "disguised appeal", which it is not.

19. Having done so, I then propose to hone in onto the specific errors and/or omissions which are inexhaustively listed in my founding affidavit.

Brief outline of some of the asserted constitutional rescindable errors and/or omissions

20. Without repeating what has already been said in my founding affidavit, I wish to deal with a few selected key grounds for this application:

20.1. First, I wish to flag the issue of the admission of hearsay evidence as a legal or constitutional error, which is mostly answerable for the erroneous granting of the impugned orders;

20.2. Second, I will deal with the limitation of my right to adduce evidence in mitigation before conviction;

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20.3. Third, the right of appeal in the context of direct access;

20.4. Fourth, the role of section 34 of the Constitution;

20.5. Fifth, detention without trial;

20.6. Sixth and crucially, the omission or failure to apply a section 36 treatment in this matter.

21. Drawing from local and international case law, I am of the view that the abovementioned issues will combine to justify the granting of the relief sought in the notice of application.

22. Lastly and in keeping with the undertaking made at paragraph 100 of my founding affidavit, I wish to give this Honourable Court an update of the parallel High Court proceedings which I had instituted in respect of seeking an order for the suspension of the arrest and committal orders pending the finalisation of this application. For ease of reference, a copy of the relevant notice of motion is annexed hereto marked "**JGZR1**":

22.1. The matter was set down for hearing and was heard on 6 July 2021 in the Pietermaritzburg High Court before Honourable Mnguni J; and

22.2. Judgment was reserved until Friday 9 July 2021.

23. Depending on the outcome thereof and/or any further developments, there exists a possibility that:

23.1. fresh or consequential proceedings may be brought before this Honourable Court with a view to governing the interim situation between

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the granting of the previous order of this court and the final determination of this application;

23.2. alternatively, this court will be approached as part of its relief, to grant an interim order in respect of the aforesaid period in terms of Rule 172 and/or Rule 173 of the Constitution.

24. In any event, this Honourable Court will be kept appraised of any latest developments.

25. Insofar as I do not deal *ad seriatim* and/or directly with the allegations made on behalf of the Commission, I do so because it raises a host of irrelevant factual disputes, controversies and unnecessary invective and provocation, all of which have no real bearing on the legal and constitutional issues raised in this rescission application. Save as aforesaid and insofar as it may become necessary, I dispute the factual averments made by or on behalf of the Commission as far-fetched and untenable. They should accordingly be rejected.

26. I do not deem it necessary or appropriate to trade insults with the Commission, its Secretary and/or its Chairperson.

27. Suffice to state that it is this kind of unsolicited and gratuitous acrimony and belligerence which is unbefitting of these parties, which made it inadvisable and virtually impossible for me to regard this Commission as a place in which there was any likelihood of being treated fairly. This issue lies at the heart of the events surrounding this matter, presently and historically. I am advised that further argument will be advanced at the hearing in this regard.

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28. I now turn to dealing with the HSF affidavit, on the basis described earlier.

Ad paragraphs 1 to 3 of the HSF affidavit

29. Save to deny that this organisation's objective is to "promote respect for human rights" the allegations in the paragraphs are uncontentious. If this was HSF's objective, it would not oppose this and other applications where my constitutional rights are undermined and violated. My experience of HSF is that it is a sponsor of the antipathy that has become more and more entrenched in our public discourse on how my beliefs, views and opinions about the judiciary and judges ought to be treated.

Ad paragraphs 4 to 9

30. To the extent that the HSF contends that I am seeking to appeal the orders of the Constitutional Court, it is a distortion of my case. I do not seek to appeal the judgment of the Constitutional Court. There are facts and circumstances that I am entitled to present before the Constitutional Court to seek a reconsideration and rescission of the orders that were granted erroneously and on facts that the Chairperson of the Commission failed to present to the Constitutional Court.

31. I deny that I do not meet the requirements of a rescission. The HSF's as well as the Commission's view that because I elected not to participate in the Commission's application, I am no longer entitled to invoke the Constitution to seek an order reversing orders that impact on my constitutional rights is wrong. I had reasons why I elected not to participate in the application by the

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Commission. Those reasons, good or bad, do not, under our Constitution, result in my loss of constitutional protection by the Court.

32. Let me elaborate. The Commission had a duty, given that I was not opposing its application to present all the relevant facts to its knowledge that would assist the Constitutional Court to evaluate whether I had committed a crime for which I should be punished by the Constitutional Court. The Commission failed to present some of the relevant and material facts. It is irrelevant what the motive is for not presenting these facts, with which I now deal.

CHAIRPERSON'S RULING ON SUBMISSION REGARDING MY MEDICAL CONDITION

33. The genesis of our dispute which the Commission decided to have resolved by the Constitutional Court is the Chairperson's ruling of 14 January 2020. The Chairperson said the following:

CHAIRPERSON: "*The Commission's legal team will deliver a replying affidavit on or before close of business on Friday the 24 January.* ***That is one. With regard to what is going to happen in regard to this application and the further appearance before the commission of the former President what has been agreed in the discussion involving myself and counsel on both sides is that this application is to be adjourned to a date to be arranged and I hasten to say arranged does not mean agreed.*** *That is one.*

2. I have accepted with some reluctance but I have accepted the offer made by the former President that the leader of his medical team should see me and in confidence convey to me information that may assist in

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understanding the medical reasons relating to his failure to appear at some stage in the past before the commission as well as information relating to the future concerning up to when he might not for medical reasons be able to appear before the commission to give evidence and when there would be no medical reasons for him not to appear. It has been accepted that with regard to this 27 to the 20 – to the 31 January the former President need not appear before the commission because of the medical reasons that he has given. The consultation or meeting that the leader of his medical team will have with me will – it is hoped assist in looking at dates when his medical condition would not prevent him from appearing before the commission. So this application will then stand adjourned to a date that will be arranged at the right time. Now before we finalise I just want to check with Mr Pretorius and Mr Masuku whether I have covered everything that needs to be said publicly that we discussed. Mr Pretorius."

34. The Chairperson was unequivocal that my appearances at the Commission would be subject to his ruling above which made it clear that such scheduling would consider and be informed by my medical team's medical report. It was only when the Chairperson sought my attendance by way of summons outside the conditions that he had made in his ruling that I began to fear that he was biased against me. Had he informed the Constitutional Court about his ruling on the scheduling of my appearances based on my medical report, it may well have accepted that the Chairperson had a duty to first comply with his own orders before he could adopt the coercive steps that he took against me. He failed to do so as he does in his answering affidavit in this application. The

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fact of the matter is that nothing demonstrates incurable prejudice and bias against me than a presiding officer who rules treats my medical issue in the manner that the Chairperson did.

35. The Chairperson of the Commission failed to inform the Constitutional Court that he had specifically ruled that he would schedule my appearances after receiving a report from my medical team. This failure to comply with his own ruling to meet my medical team and to disclose such failure to the Constitutional Court, resulted in the Constitutional Court making a decision that was clearly unconstitutional and wrong.

36. To make the bias point clearer, the Chairperson of the Commission subsequently changed his ruling and insisting that he would only meet my medical team in the presence of his own chosen doctors giving the impression that he did not trust me or my medical team to give a truthful account of my medical condition. This was the beginning of our dispute on the issue of bias. I have a right to appear before a Commission of Inquiry that is not biased. When a Chairperson of Commission says that he would do something and then fails to do so, or changes the undertaking to impose conditions that violate my constitutional rights, it gives a reasonable basis to believe that such a person is prejudiced and biased against me. My medical situation is a sensitive matter going to the core of my inherent dignity. I would not likely disclose it and where I do so, I expect that the Chairperson would treat the situation with dignity and sensitivity. His conduct appeared to me to suggest that he did not trust my word on the reasons for my failure to appear before him or to present the information that he wanted from me.

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37. The Constitutional Court was told about my review application but was not told that the Commission would not be taking any steps to have the hearing of that application expedited. The only submission that was made at the hearing was that my application to review the recusal ruling was "hopeless". What was not conveyed was more important than whether my review application was be hopeless. It was that the Commission had deliberately decided that it would not file a rule 53 record and any papers to have that issue resolved. Resolving the issue of my review application expeditiously was as important as demanding my appearance before the Commission. I should not be expected to appear before a biased Commission because to do so violates my constitutional rights in section 34 of the Constitution. Had the Commission informed the Constitutional Court that it was not going to do anything to resolve the issue of my reasonable apprehension of bias, the Constitutional Court may well have taken a view that the attitude of the Commission justified my failure to appear. In my view, the Chairperson or Commission's attitude towards my review application (that it was going to file a notice to oppose and thereafter do nothing to ensure that the application is argued on its merits) should have been disclosed to the Constitutional Court.

38. Having refused or failed to respond to my review application to determine questions relating to his impartiality, he instead embarked on highly prejudicial procedural violations that should rightly be regarded as an abuse of power and the courts. They are the following:

38.1. First, he publicly announced that he would invoke his powers under the Commissions Act as required to report my alleged conduct as a criminal

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offense to the SAPS. This procedure under the Commissions Act is mandatory and had it been followed, my constitutional rights would have been protected in so far as it prescribed a criminal trial for my conviction and sentence. He failed to disclose to the Courts his failure to comply with his own rulings based on the Commissions Act.

38.2. Second, instead of complying with his rulings in relation to my non-appearance at the Commission (in terms of the Commissions Act), he appears to have received legal advice that the Commissions Act process was inconvenient to force me to appear before the Commission. The Commission told the Constitutional Court that following the Commissions Act under the circumstances of its hearing programme was inconvenient but did not tell the Court that this position was a deviation from its own ruling conveyed to the public and me during open hearings.

38.3. Third, his decision to abandon his ruling to deal with my non-appearance at the Commission in accordance with the procedure of the Commissions Act is in itself unlawful, irrational and violates the subsidiarity principle. Having informed me and the public that he was invoking the Commissions Act to address my non-appearance at the Commission, he was simply not entitled to approach the Constitutional Court as a court of first and last instance on the grounds that he advanced therein.

38.4. The abuse of Court is that he abandoned a prescribed process in the Commissions Act (which he was aware of and which he had made a specific Commission ruling on) to approach the Constitutional Court. He also did not tell the Constitutional Court why he was entitled to abandon

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the process prescribed in the Commissions Act for a direct access urgent application to the Constitutional Court. Had he told the Constitutional Court about his ruling that my non-appearance at the Commission would be dealt with in terms of the Commissions Act, the Constitutional Court may well had deferred to that statutory process and ruling of the Commission.

38.5. The facts above are not reflected in his affidavits before the Constitutional Court. Given that he was essentially asking for a 'default judgment' based on an unopposed application against me, the Chairperson of the Commission was obliged to make a full disclosure of all the material facts and circumstances, including those that could hurt his own case against me. He failed to do so and that is partly why I am seeking a rescission judgment in the Constitutional Court based on the facts and circumstances that he omitted to present to the Court.

39. Based on the facts that were not disclosed to the Constitutional Court by the Commission itself, I am advised that I have met the requirements of a rescission of the orders. More importantly, had the Commission indicated to the Constitutional Court that it had ruled to follow the process prescribed in the Commissions Act, there would have been no contempt of court proceedings in relation to the Constitutional Court as that Court would have retained its original constitutional jurisdiction as the final court of appeal on all constitutional matters. I would have been afforded the opportunity to present my case before the criminal courts and whatever contempt I would have faced

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would have been the criminal contempt and not the civil contempt that I now face.

Ad paragraphs 10 to 23

40. The HSF's legal submissions are based on an error of law. The Constitution clearly does not require that I am discriminated against in terms of the law, because I held the position of President. I am entitled, whether as President or not, to hold beliefs, views and opinions on our judges and the judiciary. The arguments of the HSF are political rhetoric which supports the view that I should keep quiet and, in a supine manner, permit a discriminatory application of the law towards me simply because I was the President. Section 9 of the Constitution makes it clear that I am entitled to the equal treatment and equal protection and benefit of the law. This means that where I have disobeyed summons from a Commission of Inquiry, I am subjected to the prescribed process of the Commissions Act and not yanked to appear before the Constitutional Court without following the prescribed processes of the Commissions Act.

41. I am not seeking to avoid accountability at all and it is not in my interests to plunge South Africa in constitutional crises as the HSF alleges. All I ask is that I am treated no less than any ordinary person and in accordance with the law. There should be no exception created for me because I was President. In fact, if the Commission had complied with its rulings on the Commissions Act, the Constitutional Court would not have been placed in this 'extraordinary' or exceptional situation of having to fashion a special law for me. The Commissions Act creates a process that is designed to avoid that a person is

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convicted and sentenced without a criminal trial. What the Commission did was to treat me differently to other persons in my situation. I am not the first person to have had a dispute with a Commission of inquiry and our history on the Commissions Act is replete with very clear examples of more egregious violations of the Commissions Act. All I ask is that I should be treated in accordance with the Constitution and if that is done, no Court would have to create new legal principles based on exceptional circumstances.

42. A mockery of legal process is where Courts are not given the opportunity to re-evaluate extraordinary rulings that impact on people's constitutional rights. I deny that I am making a mockery of the legal process and then judiciary by approaching it to resolve a genuine dispute of law. This is the essence of our constitutional democracy – that where there are disputes that may be resolved by the application of law, the courts are approached. To scandalise my approach to the Constitutional Court in the circumstances of these extraordinary ruling, is irresponsible. I have not done anything that is not permitted in our law and for a human rights organisation to speak as the HSF demonstrates underlying political antipathy towards me. That is prejudice I cannot help the HSF with but I can assure it that I will exercise my rights responsibly as I have to ensure that they are protected, promoted and, given effect to.

Ad paragraphs 24 to 35

43. The Constitutional Court has not ordered that I should take steps to purge the contempt. It has sentenced me to serve a term of imprisonment. To purge the contempt would mean to abandon my right to have the judgment and

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orders of the Constitutional Court corrected. The argument of the HSF makes no sense in that it suggests that if an accused person is sentenced incorrectly, they must first comply with that order to purge the contempt before approaching the court for a correction of the order. That cannot be consistent with the law.

44. Obeying the orders of the Constitutional Court is no longer possible because I am not facing prison and not the Commission.

45. My views about the Constitutional Court orders are not contempt even if they were to be wrong. This is the essence of section 15 and 16 of the Constitution – that I am entitled to hold the belief, opinion and view that the Court was wrong to convict me of contempt without such a position being criminalised. A wrong belief is not contemptuous of the Court. The minority judgment held the view that the orders against me were unconstitutional even if it had found that I was in contempt of court. In the political theory of the HSF, that position of the minority judges – who are very critical of the majority judgment – is contempt of the court. I hold very strong views about the judgment because I believe that I was sentenced without a criminal trial prescribed in the Commissions Act. I am entitled to express that belief without any fear of reprisal by the HSF arguments of contempt. In essence, the HSF want to muzzle me into silence so as to achieve a dominance in the discourse over society's views on the judges and the judiciary.

Ad paragraphs 36 to 42

46. The legal submissions on the law of rescission will be dealt with more correctly in legal submissions to be filed with the Court.

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Ad paragraphs 43 to 47

47. My election not to participate in proceedings has been explained. I am not disentitled to approach the Court because of that position. In any event, it is an inaccurate position of law to suggest that a court's rescission power is limited only in cases of where ex parte applications are granted. The power is wider than that and includes where there had been active participation of all the parties. In this case, the Commission was in a position of an applicant for an ex parte application because I was not participating in the proceedings. This does not mean that a court will no rescind an order where the evidence shows that it was granted on the incorrect facts to the knowledge of the unopposed applicant.

Ad paragraph 48

48. It is not unusual for a party to adopt the position that I opted for. I did not wish to oppose the application but that does not mean that I wanted the Court to decide the case on an incomplete or inaccurate facts. That position did not entitle the Commission to submit wrong or inaccurate facts regarding my non-compliance with the Commission summons.

Ad paragraph 49

49. The HSF's belief that I pre-empted my rights to approach the Court is self-serving and incorrect. I do not do so. I am entitled to the rights in the Constitution which I exercise vigorously. In essence what the HSF says is that I should be punished for leaving the matter in the hands of the Court.

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There is something troubling about that reasoning for an organisation that believes in human rights.

50. I never consented to have my rights taken away and my position in relation to the Commission's application to the Constitutional Court does not justify the inferences drawn from it. I am entitled not to participate in any court process but that does not mean that when I have elected not to participate in such proceedings and a wrong order is made, I must live with the consequences of such a position. My current position in this Court is entirely consistent with my earlier position. All I ask is for the Court to examine the facts that the Commission did not present – to its knowledge – for the purpose of determining if the orders granted are correct. If the Constitutional Court examines the new facts and decides that they do not alter its position, then I will live with that.

Ad paragraphs 50 to 52

51. The allegation on my standing to bring this application are nonsensical.

Ad paragraphs 53 to 71

52. The legal submissions relating to whether I meet the standard for a rescission of the order will be dealt with at the hearing of this application. They are denied.

Ad paragraphs 72 to 74

53. I deny that the precedence I seek to establish will result in any of these. Where the orders have been erroneously granted, it is irrelevant that the party

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seeking a recusal had elected not to participate. The Court has a duty to ensure that its orders are given on the correct facts and evidence irrespective of whether all the parties are participant to the process. Where it is shown by a party who did not participate that there was an error in its orders, it is entirely consistent with the constitutional duties of the Courts to hear and adjudicate the matter on that basis to correct the error.

54. The arguments about direct access are interesting. They are relevant for a different reason. Where the procedure is adopted that limits the right of appeal, the Court should be flexible with a rescission hearing that is well grounded.

55. It is denied that my approach would frustrate the principle of finality in litigation. The allegations that my approach would do so are alarmist and far-fetched as they do not address the basic principle of rescission application in constitutional litigation. Where constitutional rights are involved, there is a higher requirement for the Courts to be self-reflecting in dealing with rescission application in respect of orders and judgments that were granted without opposition.

Ad paragraph 75

56. I stand by my allegations on Justice Pillay. She should have excused herself from sitting and adjudicating this matter because of her conduct in relation to a warrant of arrest that she granted against me in circumstances where there was a medical record for explaining my absence from my criminal court. There are gratuitous remarks that are also made by her in a judgment involving a defamation matter by one Mr. Hanekom which makes her unsuitable to

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preside in matters involving a determination of whether I have any integrity at all. The gratuitous insults by the HSF are unworthy of a response. They simply demonstrate its desperate political agenda of silencing any discourse that is inconsistent with its oppressive ideology clothed as liberal constitutional democracy.

Ad paragraphs 76 to 84

57. The allegations in these paragraphs are a repetitive refrain that I am not entitled to a rescission because I have not met the jurisdictional requirements. I deny these. The legal submissions will be addressed at the hearing of this application. The gratuitous insults are unworthy of my response and an insidious attempt to bolster an argument of oppression rather than the protection of human rights.

Ad paragraph 85

58. I have set out the facts that were not disclosed to the Constitutional Court by the Commission which were relevant to the issue of contempt and sentence. I stand by those.

Ad paragraphs 86 to 91

59. I stand by my allegations against the Commission. It is biased against me and no factor demonstrates this aptly than its approach to this case. I am entitled to a fair and impartial tribunal. That is the hallmark of our legal system. It is relevant that the Commission is biased because that explains why it excluded certain critical facts from its narration to the Constitutional Court. That I was not well; that the Chairperson had undertaken to receive a medical report from

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my medical team; that he had scheduled my appearances in a manner that was inconsistent with his ruling; that he failed to comply with his rulings on my appearances, and failed to file appropriate responses to the review application all combine to demonstrate an appearance of bias.

CONCLUSIONS

60. It is denied that I am not entitled to be heard as applied for. I do not believe it is a responsible position for the HSF to seek a punitive cost order against me as it is unjustified and mean. It is an abuse of the cost orders against me but I will leave this to the discretion of the Court.

WHEREFORE I pray that it may please this Honourable Court to grant the relief sought in the notice of application to which this affidavit is attached.

DEPONENT

I HEREBY CERTIFY that the deponent has acknowledged that he knows and understands the contents of this affidavit, which was signed and sworn before me at MKONDA on this the 07 day of **JULY** 2021, the regulations contained in Government Notice No R1258 of 21 July 1972, as amended, and Government Notice No R1648 of 19 August 1977, as amended, having been complied with.

SOUTH AFRICAN POLICE SERVICE
PRESIDENTIAL PROTECTION SERVICE
2021 -07- 07
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COMMISSIONER OF OATHS