

IN THE CONSTITUTIONAL COURT OF SOUTH AFRICA

CASE No.: CCT 48/2017

In the matter between:

BLACK SASH TRUST Applicant

FREEDOM UNDER LAW NPC Intervening Party

And

MINISTER OF SOCIAL DEVELOPMENT First Respondent

**CHIEF EXECUTIVE OFFICER OF THE
SOUTH AFRICAN SOCIAL SECURITY
AGENCY** Second Respondent

**SOUTH AFRICAN SOCIAL SECURITY
AGENCY** Third Respondent

MINISTER OF FINANCE Fourth Respondent

NATIONAL TREASURY Fifth Respondent

**CASH PAYMASTER SERVICES (PTY)
LIMITED** Sixth Respondent

INFORMATION REGULATOR Seventh Respondent

And

CORRUPTION WATCH (NPC) RF First Amicus Curiae

**SOUTH AFRICAN POST OFFICE SOC
LIMITED** Second Amicus Curiae

**AFFIDAVIT OF THE AUDITOR-GENERAL: THIRD REPORT OF THE PANEL IN TERMS
OF PARAGRAPH 12.4 OF COURT ORDER DATED 17 MARCH 2017**

FW

I, the undersigned,

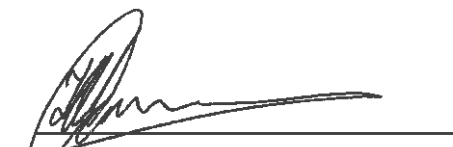
Thembekile Makwetu

do hereby make oath and state that:

- 1 I am an adult male who is the Auditor-General of South Africa. I make this affidavit on my behalf and on behalf of the expert panel appointed by this Court in terms of paragraph 1 of the Directions issued by the Chief Justice dated 6 June 2017 jointly with me ("the Panel").
- 2 In terms of paragraph 12.4 of the Court Order, the Panel (jointly with me) is required to file reports on affidavit with this Court every three months setting out steps that the Panel has taken to evaluate matters referred to in paragraph 12.1 to 12.3 of the Court Order, the results of the Panel's evaluation and any recommendation the Panel considers necessary.
- 3 I attach the third report of the Panel ("the Report") to this Court as Annexure "A".
- 4 The Report sets out the results of the evaluations of certain matters referred to in paragraphs 12.1 to 12.3 of the Court Order and lists recommendations the Panel considers necessary.
- 5 The Report contains –
 - 5.1 facts that are within my personal knowledge unless indicated otherwise, and which are, to the best of my knowledge and belief, true and correct;
 - 5.2 information provided to the Panel by other parties, the accuracy of which the Panel could not verify;

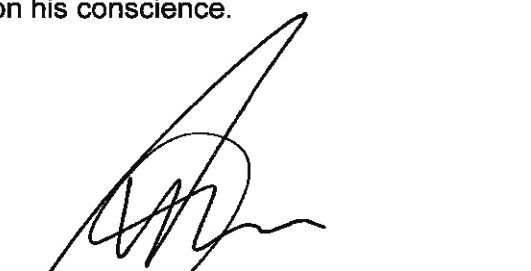


- 5.3 references to views and opinions expressed by third parties; and
- 5.4 assessments, findings, conclusions and recommendations made by individual members or groups of members of the Panel with relevant expertise, and in respect of which I do not have relevant expertise and rely on the expertise of the other members of the Panel, and which have been adopted by the Panel.
- 6 I refer in this regard to confirmatory affidavits of each member of the Panel, which are filed together with my affidavit and the Report.



DEPONENT

SIGNED and SWORN to BEFORE ME at Pretoria on this the 25th day of JANUARY 2018, the deponent having acknowledged that he knows and understands the contents of this affidavit, that he has no objection to taking the prescribed oath and that he considers the oath to be binding on his conscience.



COMMISSIONER OF OATHS

WASEEM GANI
 Macrobert Incorporated Attorneys
 C/o Jan Shoba & Justice Mahomed St. Brooklyn, PT
 Commissioner Of Oaths / Kommissaris Van Ede
 Ex Officio
 Practising Attorney / Praktiserende Prokureur
 Republic Of South Africa / Republiek Van Suid-afrika

IN THE CONSTITUTIONAL COURT OF SOUTH AFRICA

CASE No.: CCT 48/2017

In the matter between:

BLACK SASH TRUST Applicant

FREEDOM UNDER LAW NPC Intervening Party

And

MINISTER OF SOCIAL DEVELOPMENT First Respondent

**CHIEF EXECUTIVE OFFICER OF THE
SOUTH AFRICAN SOCIAL SECURITY
AGENCY** Second Respondent

**SOUTH AFRICAN SOCIAL SECURITY
AGENCY** Third Respondent

MINISTER OF FINANCE Fourth Respondent

NATIONAL TREASURY Fifth Respondent

**CASH PAYMASTER SERVICES (PTY)
LIMITED** Sixth Respondent

INFORMATION REGULATOR Seventh Respondent

And

CORRUPTION WATCH (NPC) RF First Amicus Curiae

**SOUTH AFRICAN POST OFFICE SOC
LIMITED** Second Amicus Curiae

CONFIRMATORY AFFIDAVIT

J.
B.


I, the undersigned,

Angela Bester

do hereby make oath and state that:

- 1 I am an adult female consultant with extensive expertise in social assistance policy, organisational development and monitoring and evaluation. I am a member of the expert panel appointed by this Court in terms of paragraph 1 of the Directions issued by the Chief Justice dated 6 June 2017 ("the Panel").
- 2 I have read the affidavit of Thembekile Makwetu attaching the third report of the Panel. I confirm that it is the third report of the Panel.
- 3 I also confirm that the report contains –
 - 3.1 facts that are within my personal knowledge unless indicated otherwise, and which are, to the best of my knowledge and belief, true and correct;
 - 3.2 information provided to the Panel by other parties, the accuracy of which the Panel could not verify;
 - 3.3 references to views and opinions expressed by third parties; and
 - 3.4 assessments, findings, conclusions and recommendations made by individual members or groups of members of the Panel with relevant expertise, and in respect of which I do not have the relevant expertise and rely on the expertise of the other members of the Panel, and which have been adopted by the Panel.

A handwritten signature in black ink, followed by a circular stamp or seal, also in black ink, located in the bottom right corner of the page.



DEPONENT

SIGNED and SWORN to BEFORE ME at Clanwilliam on this the 25th day of JANUARY 2018, the deponent having acknowledged that she knows and understands the contents of this affidavit, that she has no objection to taking the prescribed oath and that she considers the oath to be binding on her conscience.



COMMISSIONER OF OATHS

GRANT SPAMMER
BLC. LLB
ATTORNEY AT LAW
COMMISSIONER OF OATHS
MAIN ROAD, P.O. BOX 277
CLANWILLIAM, 8135

IN THE CONSTITUTIONAL COURT OF SOUTH AFRICA

CASE No.: CCT 48/2017

In the matter between:

BLACK SASH TRUST Applicant

FREEDOM UNDER LAW NPC Intervening Party

And

MINISTER OF SOCIAL DEVELOPMENT First Respondent

**CHIEF EXECUTIVE OFFICER OF THE
SOUTH AFRICAN SOCIAL SECURITY
AGENCY** Second Respondent

**SOUTH AFRICAN SOCIAL SECURITY
AGENCY** Third Respondent

MINISTER OF FINANCE Fourth Respondent

NATIONAL TREASURY Fifth Respondent

**CASH PAYMASTER SERVICES (PTY)
LIMITED** Sixth Respondent

INFORMATION REGULATOR Seventh Respondent

And

CORRUPTION WATCH (NPC) RF First Amicus Curiae

**SOUTH AFRICAN POST OFFICE SOC
LIMITED** Second Amicus Curiae

CONFIRMATORY AFFIDAVIT



I, the undersigned,

Anthony Felet

do hereby make oath and state that:

- 1 I am an adult male accountant and a partner in the competition and regulatory economics division of Genesis Analytics with regulatory financial expertise. I am a member of the expert panel appointed by this Court in terms of paragraph 1 of the Directions issued by the Chief Justice dated 6 June 2017 ("the Panel").
- 2 I have read the affidavit of Thembekile Makwetu attaching the third report of the Panel.
I confirm that it is the third report of the Panel.
- 3 I also confirm that the report contains –
 - 3.1 facts that are within my personal knowledge unless indicated otherwise, and which are, to the best of my knowledge and belief, true and correct;
 - 3.2 information provided to the Panel by other parties, the accuracy of which the Panel could not verify;
 - 3.3 references to views and opinions expressed by third parties; and
 - 3.4 assessments, findings, conclusions and recommendations made by individual members or groups of members of the Panel with relevant expertise, and in respect of which I do not have the relevant expertise and rely on the expertise of the other members of the Panel, and which have been adopted by the Panel.






DEPONENT

SIGNED and SWORN to BEFORE ME at Hyde Park on this the 25 day of JANUARY 2018, the deponent having acknowledged that he knows and understands the contents of this affidavit, that he has no objection to taking the prescribed oath and that he considers the oath to be binding on his conscience.

CERTIFIED A TRUE COPY OF THE ORIGINAL



COMMISSIONER OF OATHS (RSA)
Mike Oliver
Chartered Accountant (SA)
Membership No: 03095041

Office No: 3, 50 Sixth Road,
Durbanville, 7801
South Africa, 2196

COMMISSIONER OF OATHS

25/1/2018



IN THE CONSTITUTIONAL COURT OF SOUTH AFRICA

CASE No.: CCT 48/2017

In the matter between:

BLACK SASH TRUST Applicant

FREEDOM UNDER LAW NPC Intervening Party

And

MINISTER OF SOCIAL DEVELOPMENT First Respondent

**CHIEF EXECUTIVE OFFICER OF THE
SOUTH AFRICAN SOCIAL SECURITY
AGENCY** Second Respondent

**SOUTH AFRICAN SOCIAL SECURITY
AGENCY** Third Respondent

MINISTER OF FINANCE Fourth Respondent

NATIONAL TREASURY Fifth Respondent

**CASH PAYMASTER SERVICES (PTY)
LIMITED** Sixth Respondent

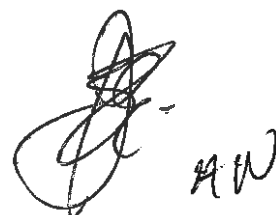
INFORMATION REGULATOR Seventh Respondent

And

CORRUPTION WATCH (NPC) RF First Amicus Curiae

**SOUTH AFRICAN POST OFFICE SOC
LIMITED** Second Amicus Curiae

CONFIRMATORY AFFIDAVIT




I, the undersigned,

Dr Barend Taute

do hereby make oath and state that:

- 1 I am an adult male electrical engineer employed as a manager in information, communication and technology – research and development at the Council for Scientific and Industrial Research (CSIR) with extensive expertise in cyber security. I am a member of the expert panel appointed by this Court in terms of paragraph 1 of the Directions issued by the Chief Justice dated 6 June 2017 (“the Panel”).
- 2 I have read the affidavit of Thembekile Makwetu attaching the third report of the Panel. I confirm that it is the third report of the Panel.
- 3 I also confirm that the report contains –
 - 3.1 facts that are within my personal knowledge unless indicated otherwise, and which are, to the best of my knowledge and belief, true and correct;
 - 3.2 information provided to the Panel by other parties, the accuracy of which the Panel could not verify;
 - 3.3 references to views and opinions expressed by third parties; and
 - 3.4 assessments, findings, conclusions and recommendations made by individual members or groups of members of the Panel with relevant expertise, and in respect of which I do not have the relevant expertise and rely on the expertise of the other members of the Panel, and which have been adopted by the Panel.



A N.

[Signature]
DEPONENT

SIGNED and SWORN to BEFORE ME at Pretoria on this the 25th day of JANUARY 2018, the deponent having acknowledged that he knows and understands the contents of this affidavit, that he has no objection to taking the prescribed oath and that he considers the oath to be binding on his conscience.

COMMUNICAFICAN POLICE SERVICE
GARCFONTEN
2018 -01- 25
COMMUNITY SERVICE CENTRE
SUID-AFRIKAANSE POLISIEDIENS

[Signature]
COMMISSIONER OF OATHS

IN THE CONSTITUTIONAL COURT OF SOUTH AFRICA

CASE No.: CCT 48/2017

In the matter between:

BLACK SASH TRUST Applicant

FREEDOM UNDER LAW NPC Intervening Party

And

MINISTER OF SOCIAL DEVELOPMENT First Respondent

**CHIEF EXECUTIVE OFFICER OF THE
SOUTH AFRICAN SOCIAL SECURITY
AGENCY** Second Respondent

**SOUTH AFRICAN SOCIAL SECURITY
AGENCY** Third Respondent

MINISTER OF FINANCE Fourth Respondent

NATIONAL TREASURY Fifth Respondent

**CASH PAYMASTER SERVICES (PTY)
LIMITED** Sixth Respondent

INFORMATION REGULATOR Seventh Respondent

And

CORRUPTION WATCH (NPC) RF First Amicus Curiae

**SOUTH AFRICAN POST OFFICE SOC
LIMITED** Second Amicus Curiae

CONFIRMATORY AFFIDAVIT




I, the undersigned,

Doris Lebogang Johanna Tshepe

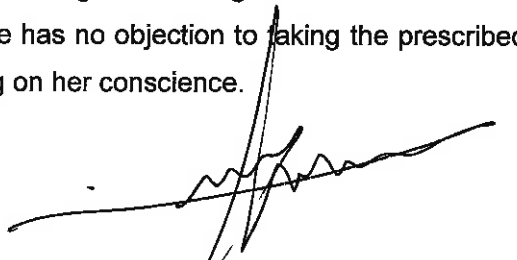
do hereby make oath and state that:

- 1 I am an adult female employed as a practising attorney at Cheadle Thompson & Haysom Inc. I am a member of the expert panel appointed by this Court in terms of paragraph 1 of the Directions issued by the Chief Justice dated 6 June 2017 ("the Panel").
- 2 I have read the affidavit of Thembekile Makwetu attaching the third report of the Panel. I confirm that it is the third report of the Panel.
- 3 I also confirm that the report contains –
 - 3.1 facts that are within my personal knowledge unless indicated otherwise, and which are, to the best of my knowledge and belief, true and correct;
 - 3.2 information provided to the Panel by other parties, the accuracy of which the Panel could not verify;
 - 3.3 references to views and opinions expressed by third parties; and
 - 3.4 assessments, findings, conclusions and recommendations made by individual members or groups of members of the Panel with relevant expertise, and in respect of which I do not have the relevant expertise and rely on the expertise of the other members of the Panel, and which have been adopted by the Panel.




DEPONENT

SIGNED and SWORN to BEFORE ME at Johannesburg on this the 25th day of JANUARY 2018, the deponent having acknowledged that she knows and understands the contents of this affidavit, that she has no objection to taking the prescribed oath and that she considers the oath to be binding on her conscience.


COMMISSIONER OF OATHS

FREDERIK ADRIAAN GROBLER
Commissioner of Oaths
Ex Officio Practising Attorney R.S.A.
12th Floor, East Wing, Libridge Building
25 Ameshoff Street, Braamfontein
Johannesburg, 2001
(011) 628 8600

IN THE CONSTITUTIONAL COURT OF SOUTH AFRICA

CASE No.: CCT 48/2017

In the matter between:

BLACK SASH TRUST Applicant

FREEDOM UNDER LAW NPC Intervening Party

And

MINISTER OF SOCIAL DEVELOPMENT First Respondent

**CHIEF EXECUTIVE OFFICER OF THE
SOUTH AFRICAN SOCIAL SECURITY
AGENCY** Second Respondent

**SOUTH AFRICAN SOCIAL SECURITY
AGENCY** Third Respondent

MINISTER OF FINANCE Fourth Respondent

NATIONAL TREASURY Fifth Respondent

**CASH PAYMASTER SERVICES (PTY)
LIMITED** Sixth Respondent

INFORMATION REGULATOR Seventh Respondent

And

CORRUPTION WATCH (NPC) RF First Amicus Curiae

**SOUTH AFRICAN POST OFFICE SOC
LIMITED** Second Amicus Curiae

CONFIRMATORY AFFIDAVIT



I, the undersigned,

Heinz Weilert

do hereby make oath and state that:

- 1 I am an adult male consultant with extensive expertise in banking and information technology and accounting, business development and business integration. I am a member of the expert panel appointed by this Court in terms of paragraph 1 of the Directions issued by the Chief Justice dated 6 June 2017 ("the Panel").
- 2 I have read the affidavit of Thembekile Makwetu attaching the third report of the Panel. I confirm that it is the third report of the Panel.
- 3 I also confirm that the report contains –
 - 3.1 facts that are within my personal knowledge unless indicated otherwise, and which are, to the best of my knowledge and belief, true and correct;
 - 3.2 information provided to the Panel by other parties, the accuracy of which the Panel could not verify;
 - 3.3 references to views and opinions expressed by third parties; and
 - 3.4 assessments, findings, conclusions and recommendations made by individual members or groups of members of the Panel with relevant expertise, and in respect of which I do not have the relevant expertise and rely on the expertise of the other members of the Panel, and which have been adopted by the Panel.




DEPONENT

SIGNED and SWORN to BEFORE ME at Johannesburg on this the 25th day of JANUARY 2018, the deponent having acknowledged that he knows and understands the contents of this affidavit, that he has no objection to taking the prescribed oath and that he considers the oath to be binding on his conscience.


COMMISSIONER OF OATHS

FREDERIK ADRIAAN GROBLER
Commissioner of Oaths
Ex Officio Practising Attorney R.S.A.
12th Floor, East Wing, Libridge Building
25 Ameshoff Street, Braamfontein
Johannesburg, 2001
(011) 628 8600

IN THE CONSTITUTIONAL COURT OF SOUTH AFRICA

CASE No.: CCT 48/2017

In the matter between:

BLACK SASH TRUST

Applicant

FREEDOM UNDER LAW NPC

Intervening Party

And

MINISTER OF SOCIAL DEVELOPMENT

First Respondent

**CHIEF EXECUTIVE OFFICER OF THE
SOUTH AFRICAN SOCIAL SECURITY
AGENCY**

Second Respondent

**SOUTH AFRICAN SOCIAL SECURITY
AGENCY**

Third Respondent

MINISTER OF FINANCE

Fourth Respondent

NATIONAL TREASURY

Fifth Respondent

**CASH PAYMASTER SERVICES (PTY)
LIMITED**

Sixth Respondent

INFORMATION REGULATOR

Seventh Respondent

And

CORRUPTION WATCH (NPC) RF

First Amicus Curiae

**SOUTH AFRICAN POST OFFICE SOC
LIMITED**

Second Amicus Curiae

CONFIRMATORY AFFIDAVIT

 MIM


I, the undersigned,

Mavuso Msimang

do hereby make oath and state that:

- 1 I am an adult male independent consultant with extensive expertise in financial oversight, business leadership, corporate management and governance. I am a member of the expert panel appointed by this Court in terms of paragraph 1 of the Directions issued by the Chief Justice dated 6 June 2017 ("the Panel").
- 2 I have read the affidavit of Thembekile Makwetu attaching the third report of the Panel. I confirm that it is the third report of the Panel.
- 3 I also confirm that the report contains –
 - 3.1 facts that are within my personal knowledge unless indicated otherwise, and which are, to the best of my knowledge and belief, true and correct;
 - 3.2 information provided to the Panel by other parties, the accuracy of which the Panel could not verify;
 - 3.3 references to views and opinions expressed by third parties; and
 - 3.4 assessments, findings, conclusions and recommendations made by individual members or groups of members of the Panel with relevant expertise, and in respect of which I do not have the relevant expertise and rely on the expertise of the other members of the Panel, and which have been adopted by the Panel.

 MIM


DEPONENT

SIGNED and SWORN to BEFORE ME at Pretoria on this the 26 day of JANUARY 2018, the deponent having acknowledged that he knows and understands the contents of this affidavit, that he has no objection to taking the prescribed oath and that he considers the oath to be binding on his conscience.


COMMISSIONER OF OATHS

Mufhati Munyangane
Commissioner of Oaths
Practising Attorney, Gauteng
Diale Mogashoa Attorneys
Brookfield Office Park
Ground Floor, South Block
272 Bronkhorst Street
Nieuw Muckleneuk, 0181

IN THE CONSTITUTIONAL COURT OF SOUTH AFRICA

CASE No.: CCT 48/2017

In the matter between:

BLACK SASH TRUST

Applicant

FREEDOM UNDER LAW NPC

Intervening Party

And

MINISTER OF SOCIAL DEVELOPMENT

First Respondent

**CHIEF EXECUTIVE OFFICER OF THE
SOUTH AFRICAN SOCIAL SECURITY
AGENCY**

Second Respondent

**SOUTH AFRICAN SOCIAL SECURITY
AGENCY**

Third Respondent

MINISTER OF FINANCE

Fourth Respondent

NATIONAL TREASURY

Fifth Respondent

**CASH PAYMASTER SERVICES (PTY)
LIMITED**

Sixth Respondent

INFORMATION REGULATOR

Seventh Respondent

And

CORRUPTION WATCH (NPC) RF

First Amicus Curiae

**SOUTH AFRICAN POST OFFICE SOC
LIMITED**

Second Amicus Curiae

CONFIRMATORY AFFIDAVIT

M.E.
J.M.

I, the undersigned,

Mmamolatelolo Ezekiel Mathekga

do hereby make oath and state that:

- 1 I am an adult male electrical engineer employed as a senior researcher in biometrics at the Council for Scientific and Industrial Research (CSIR). I am a member of the expert panel appointed by this Court in terms of paragraph 1 of the Directions issued by the Chief Justice dated 6 June 2017 ("the Panel").

- 2 I have read the affidavit of Thembekile Makwetu attaching the third report of the Panel. I confirm that it is the third report of the Panel.

- 3 I also confirm that the report contains –
 - 3.1 facts that are within my personal knowledge unless indicated otherwise, and which are, to the best of my knowledge and belief, true and correct;
 - 3.2 information provided to the Panel by other parties, the accuracy of which the Panel could not verify;
 - 3.3 references to views and opinions expressed by third parties; and
 - 3.4 assessments, findings, conclusions and recommendations made by individual members or groups of members of the Panel with relevant expertise, and in respect of which I do not have the relevant expertise and rely on the expertise of the other members of the Panel, and which have been adopted by the Panel.

M.E.
J.M.

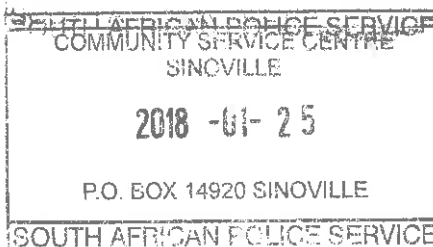
[Handwritten signature]

DEPONENT

SIGNED and SWORN to BEFORE ME at SINOVILLE SAPS on this the 25 day of JANUARY 2018, the deponent having acknowledged that he knows and understands the contents of this affidavit, that he has no objection to taking the prescribed oath and that he considers the oath to be binding on his conscience.

710109076
[Handwritten signature]

COMMISSIONER OF OATHS



IN THE CONSTITUTIONAL COURT OF SOUTH AFRICA

CASE No.: CCT 48/2017

In the matter between:

BLACK SASH TRUST Applicant

FREEDOM UNDER LAW NPC Intervening Party

And

MINISTER OF SOCIAL DEVELOPMENT First Respondent

**CHIEF EXECUTIVE OFFICER OF THE
SOUTH AFRICAN SOCIAL SECURITY
AGENCY** Second Respondent

**SOUTH AFRICAN SOCIAL SECURITY
AGENCY** Third Respondent

MINISTER OF FINANCE Fourth Respondent

NATIONAL TREASURY Fifth Respondent

**CASH PAYMASTER SERVICES (PTY)
LIMITED** Sixth Respondent

INFORMATION REGULATOR Seventh Respondent

And

CORRUPTION WATCH (NPC) RF First Amicus Curiae

**SOUTH AFRICAN POST OFFICE SOC
LIMITED** Second Amicus Curiae

CONFIRMATORY AFFIDAVIT



I, the undersigned,

Piet Madimetja Timothy Masela

do hereby make oath and state that:

- 1 I am an adult male employed as the Head of the National Payment System Department of the South Africa Reserve Bank. I am a member of the expert panel appointed by this Court in terms of paragraph 1 of the Directions issued by the Chief Justice dated 6 June 2017 ("the Panel").

- 2 I have read the affidavit of Thembekile Makwetu attaching the third report of the Panel. I confirm that it is the third report of the Panel.

- 3 I also confirm that the report contains –
 - 3.1 facts that are within my personal knowledge unless indicated otherwise, and which are, to the best of my knowledge and belief, true and correct;
 - 3.2 information provided to the Panel by other parties, the accuracy of which the Panel could not verify;
 - 3.3 references to views and opinions expressed by third parties; and
 - 3.4 assessments, findings, conclusions and recommendations made by individual members or groups of members of the Panel with relevant expertise, and in respect of which I do not have the relevant expertise and rely on the expertise of the other members of the Panel, and which have been adopted by the Panel.



WG


DEPONENT

SIGNED and SWORN to BEFORE ME at Pretoria on this the 25th day of JANUARY 2018, the deponent having acknowledged that he knows and understands the contents of this affidavit, that he has no objection to taking the prescribed oath and that he considers the oath to be binding on his conscience.


COMMISSIONER OF OATHS

WASEEM GANI
Macrobert Incorporated Attorneys
C/o Jan Shoba & Justice Mahomed St. Brooklyn, PT 1
Commissioner Of Oaths / Kommissaris Van Ede
Ex Officio
Practising Attorney / Praktiserende Prokureur
Republic Of South Africa / Republiek Van Suid-afrika

IN THE CONSTITUTIONAL COURT OF SOUTH AFRICA

CASE No.: CCT 48/2017

In the matter between:

BLACK SASH TRUST

Applicant

FREEDOM UNDER LAW NPC

Intervening Party

And

MINISTER OF SOCIAL DEVELOPMENT

First Respondent

**CHIEF EXECUTIVE OFFICER OF THE
SOUTH AFRICAN SOCIAL SECURITY
AGENCY**

Second Respondent

**SOUTH AFRICAN SOCIAL SECURITY
AGENCY**

Third Respondent

MINISTER OF FINANCE

Fourth Respondent

NATIONAL TREASURY

Fifth Respondent

**CASH PAYMASTER SERVICES (PTY)
LIMITED**

Sixth Respondent

INFORMATION REGULATOR

Seventh Respondent

And

CORRUPTION WATCH (NPC) RF

First Amicus Curiae

**SOUTH AFRICAN POST OFFICE SOC
LIMITED**

Second Amicus Curiae

CONFIRMATORY AFFIDAVIT



I, the undersigned,

Werner Krull

do hereby make oath and state that:

- 1 I am an adult male legal practitioner with extensive expertise in constitutional and public law, and in particular social assistance legislation. I am a member of the panel of experts appointed by this Court in terms of paragraph 1 of the Directions issued by the Chief Justice dated 6 June 2017 ("the Panel").
- 2 I have read the affidavit of Thembekile Makwetu attaching the third report of the Panel. I confirm that it is the third report of the Panel.
- 3 I also confirm that the report contains –
 - 3.1 facts that are within my personal knowledge unless indicated otherwise, and which are, to the best of my knowledge and belief, true and correct;
 - 3.2 information provided to the Panel by other parties, the accuracy of which the Panel could not verify;
 - 3.3 references to views and opinions expressed by third parties; and
 - 3.4 assessments, findings, conclusions and recommendations made by individual members or groups of members of the Panel with relevant expertise, and in respect of which I do not have the relevant expertise and rely on the expertise of the other members of the Panel, and which have been adopted by the Panel.

R. JK

[Handwritten signature]

DEPONENT

SIGNED and SWORN to BEFORE ME at BROOKLYN SAPS on this the 26 day of JANUARY 2018, the deponent having acknowledged that he knows and understands the contents of this affidavit, that he has no objection to taking the prescribed oath and that he considers the oath to be binding on his conscience.

SOUTH AFRICAN POLICE SERVICE
COMMUNITY SERVICE CENTRE
BROOKLYN
2018 -01- 26
GEMEENSKAPSDIENSSENTRUM
BROOKLYN
SUID-AFRIKAANSE POLISIEDIENS

[Handwritten signature]
70455395
C/O MALOMA RAYMOND
COMMISSIONER OF OATHS

R. D!