



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



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POLITICAL INTERFERENCE AND CORRUPTION
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INDEX TO IN-CAMERA APPLICATION OF WITNESS M

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**IN THE JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF
CRIMINALITY, POLITICAL INTERFERENCE AND CORRUPTION IN THE
CRIMINAL JUSTICE SYSTEM
HELD AT PRETORIA**

In the application of:

WITNESS M

Applicant

And

**THE SECRETARY OF THE JUDICIAL COMMISSION OF
INQUIRY INTO ALLEGATIONS OF CRIMINALITY, POLITICAL
INTERFERENCE AND CORRUPTION IN THE CRIMINAL
JUSTICE SYSTEM**

Respondent

**NOTICE OF MOTION
APPLICATION FOR THE EVIDENCE TO BE HELD *IN CAMERA***

KINDLY TAKE NOTICE that the Applicant hereby applies to the Chairperson of the Commission, in terms of Rules 4.2 and 4.3, read with Rule 11 of the Commission's Rules, for the relief set out below:

1. Condoning any non-compliance with the Rules of the Commission regarding the timeframes set for making applications of this nature.
2. Directing, in terms of the Rules of the Commission, that the Applicant's appearance before the Commission, and any subsequent appearance before the Commission, be held *in camera*;
3. Directing that the Applicant's testimony, including any transcript, recording, or documentation, be treated as confidential, and that all persons present during the

in camera proceedings be prohibited from disclosing any information arising the hearing, subject to the directions of the Chairperson.

4. That the Chairperson shall specify in the order those persons who will be permitted to attend the *in camera* proceedings.
5. That such further and/or alternative relief be granted as the Chairperson of the Commission may deem fit.

TAKE FURTHER NOTICE that that the accompanying affidavit of **WITNESS M** will be used in support of this application.

DATED AT [REDACTED] **ON THIS** [REDACTED] **DAY OF JULY 2026.**

APPLICANT
WITNESS M

**TO: THE CHAIRPERSON OF THE JUDICIAL COMMISSION OF INQUIRY
 INTO CRIMINALITY, POLITICAL INTERFERENCE, AND
 CORRUPTION IN THE CRIMINAL JUSTICE SYSTEM.**

**AND TO: THE SECRETARY OF THE JUDICIAL COMMISSION OF INQUIRY
 INTO CRIMINALITY, POLITICAL INTERFERENCE AND
 CORRUPTION IN THE CRIMINAL JUSTICE SYSTEM.**

**FOUNDING AFFIDAVIT
IN SUPPORT OF THE APPLICATION FOR *IN CAMERA* HEARING**

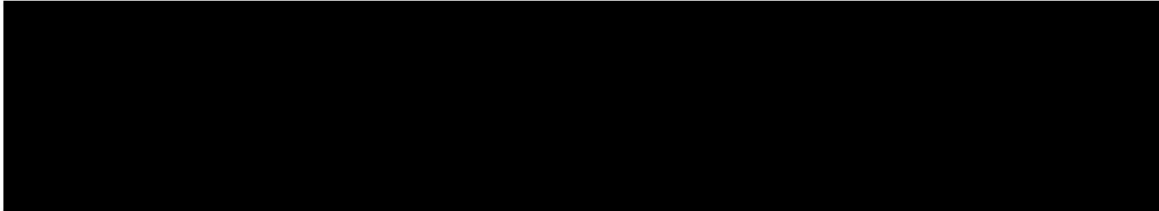
I, the undersigned,

WITNESS M

Do hereby make oath and state that:

1. I am an adult male businessman.
2. The facts contained herein are, unless otherwise stated or the context indicates otherwise, within my personal knowledge and are to the best of my belief both true and correct.

PURPOSE OF THIS APPLICATION

3. I am humbly requesting permission from the Commission to testify *in camera* and not to have same televised or be heard in public. The request stems from the fact that I would be providing evidence that is of a sensitive nature and could jeopardise my safety, that of my family and it could have an adverse effect on the reputation of my business.
4. 
5. I make this application in good faith to showcase my willingness to assist the Commission and to place important information before it for the Commissioners' consideration.

REASONS TO HAVE THE *IN CAMERA* APPLICATION



Nature of the Evidence

6. On [REDACTED], I received a subpoena, requiring me to appear before the Commission to give evidence and answer questions about matters that the Commission is investigating.
7. I have been directed to give evidence about events relating to a drug bust that occurred on the [REDACTED] and related incidents.
8. Part of the evidence that I was directed to relay at the Commission relates to: (i) the genesis of my knowledge about the shipment of drugs that was discovered ; (ii) my surveillance and monitoring of the said shipment [REDACTED] [REDACTED]; (iii) my involvement and interest in following up on the said shipment; (iv) my relationship with law enforcement officers, (v) my relationship with the owner or person interested in the shipment; and (vi) my role and general involvement in the drug bust, in particular, my presence at the crime scene.

Safety Concerns

9. The information contained in my witness statement dated [REDACTED] is of highly sensitive nature as it involves: (i) heads of state; (ii) drug syndicates and crime families; (iii) terrorist organisations; (iv) politically linked individuals; and (v) law enforcement officers. I firmly believe that if my evidence emanating from my further supplementary statements is made public, I will be placed at serious personal risk. I also believe that this could increase the chance of harm being done to me and/or my family, including the possibility that we could be killed.
10. I record that after my first engagements with the Commission, I became increasingly concerned about my personal safety and the safety of my family. The nature of the evidence I am giving, and the persons implicated by it, caused me to believe that if this evidence is given publicly it could expose me and my family to serious risk.

11. In addition to the above, on [REDACTED] I noticed that there were two vehicles surveilling my house. I was very concerned because these people, who I do not know, had managed to find my residence. I then sent the number plates to the Commission's Head of Security, Mr October.
12. I then made arrangements for my wife to be removed from our residence. The two cars gained entry to a secure estate. I still do not know how they were able to access the estate.
13. I have also received phone calls from persons whose identities were not immediately apparent to me. Given the surrounding circumstances and the sensitive nature of the matters addressed in this affidavit, those calls contributed to my concern that attempts were being made to monitor, intimidate, or locate me.
14. While I am willing to assist the Commission, I cannot risk my life and importantly the lives of my family members who were not involved in my past conduct.
15. As appears from my statement which has been made available to the Commission, in my evidence, will deal with various criminal syndicates, complicity of law enforcement and the transportation of illicit drugs and weapons into the country. [REDACTED]
[REDACTED] The contents of my statement speak for himself – complete disclosure will have devastating consequences on my life and my loved ones.
16. I respectfully submit that the interest of justice supports the granting of this application. Allowing me to testify *in camera* will protect me and my family, will not prejudice the Commission or any other party, and will help me give my evidence in a manner that is conducive to my wellbeing, honestly and without fear. This request is not an attempt to avoid testifying, as I remain willing to assist the Commission fully.

17. I accordingly request that the Chairperson grants the relief sought in the Notice of Motion.

[REDACTED]
WITNESS M

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JUDICIAL COMMISSION OF INQUIRY INTO CRIMINALITY, POLITICAL INTERFERENCE AND CORRUPTION IN THE CRIMINAL JUSTICE SYSTEM ARISING FROM THE SPECIFIC ALLEGATIONS MADE PUBLIC BY LIEUTENANT GENERAL NHLANHLA MKHWANAZI ON 6 JULY 2025

NOTICE IN TERMS OF RULE 4 OF THE RULES GOVERNING THE PROCEEDINGS OF THE COMMISSION

TAKE NOTICE THAT the witness said to testify during the week of 6 -10 July 2026, has brought an application before the Commissioners for an order in the following terms:

1. Directing that the testimony of a further, unidentified witness, in the Drug Busts Stream scheduled to testify during and any of the days of the week of 6 - 10 July 2026 be heard in-camera.

PLEASE TAKE NOTE THAT the witness will rely on the founding affidavit attached hereto in support of the order sought.

TAKE NOTICE FURTHER THAT, should same be opposed the media has 24 hours within which to note their opposition to the Commission.

DATED AT **PRETORIA** ON THIS **3 JULY 2026**.



DIALE MOGASHOA ATTORNEYS

ATTORNEYS FOR COMMISSION

1ST AND 2ND FLOORS

MENLYN CORNER

87 FRIKKIE DE BEER STREET

MENLYN

PRETORIA

TELEPHONE: (012) 346 5436

Email:

TO: THE APPLICANT
WITNESS M

AND TO: ALL MEDIA