



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



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

INDEX TO IN-CAMERA APPLICATION OF WITNESS J

ITEM	DESCRIPTION	PAGE NO.
1.	Notice of Motion	1 - 2
2.	Founding Affidavit of Witness J	3 - 7
3.	Rule 4 Notice	8 - 9
4.	Letter to Media and All	10 - 11

**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:



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 from 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. 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 [REDACTED] [REDACTED] will be used in support of this application.

**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,



Do hereby make oath and state that:

1. I am an adult [REDACTED] and employed as a [REDACTED] in the South African Police Service, and in service of the Directorate for Priority Crime Investigation with persal number [REDACTED]. I am attached to the Priority Crime Management Centre [REDACTED] as an Analyst.
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 provide evidence *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 current and/or future investigations.
4. Should my physical attendance be required and have my testimony heard in public, it could seriously affect my safety, the safety of my family, and the progress of my investigations and the investigation itself for the reasons I will explain below.

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 10 June 2026, I received a call requiring me to appear before the Commission to give evidence and answer questions concerning matters under investigation by the Commission.
7. I have been directed to give evidence concerning the analysis of data extracted from the suspects' cellular phones and related devices, including messages and text communications, call records, contact information, geolocation data, movement patterns, and other digital information relevant to determining whether the suspects were linked to one another and to the offence charged under Booyens CAS [REDACTED]
8. The analysis also extends to various communication platforms and applications used by the suspects, including encrypted messaging applications and ordinary cellular platforms. This includes, where relevant, Threema, WhatsApp, Telegram and other applications used to communicate, coordinate movements, share information, or facilitate conduct relevant to the Commission's investigation.
9. The purpose of this analysis is not limited to identifying isolated communications. It also involves examining the broader digital footprint of the suspects in order to identify possible links, associations, patterns of communication and movement, and the potential criminal network within which the suspects may have operated. This analysis is intended to assist in unearthing potential role players and understanding their respective roles in the matters under investigation.

10. The evidence I have been asked to present indicates that:

10.1 Mr. Tumelo Nku played an active role in monitoring, facilitating and communicating about the movement of the container of drugs from the Port of Durban, Kwa-Zulu Natal to Johannesburg, Gauteng, and that communication, call and movement data linked him to other persons relevant to Booyens CAS [REDACTED]

10.2 The digital evidence supports the existence of a coordinated network of individuals communicating through encrypted messaging applications, ordinary cellular platforms and other applications in relation to container movements, transport arrangements and the suspected retrieval of illicit goods.

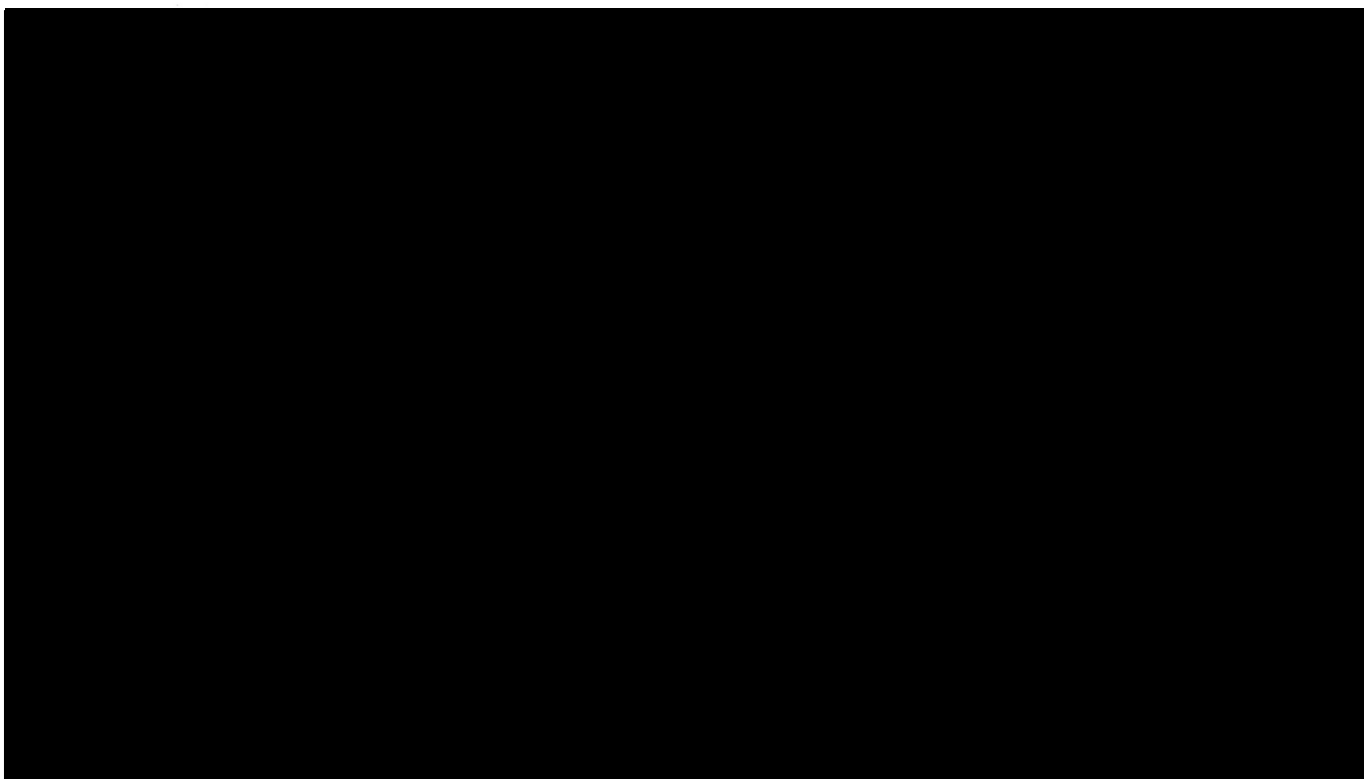
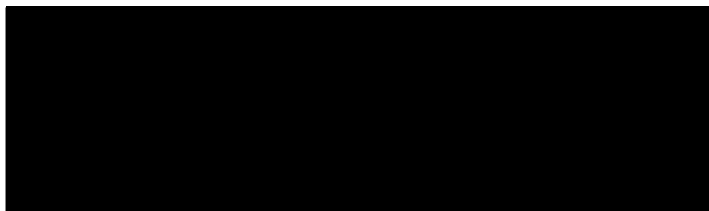
11. The evidence includes analysis that has already been made public, through Lt Col Sebola; as well as further analysis that is new and, to the best of my knowledge, is not yet known to the suspects or to the public. The disclosure of the new analysis in open proceedings will compromise investigative leads, alert persons who may be implicated, and prejudice ongoing or future investigations.

12. I therefore request that the evidence that has not been disclosed publicly, be heard in camera to preserve the integrity of the investigation and to safeguard the investigative leads generated through the analysis.

Safety Concerns

13. I am employed as an analyst and am not ordinarily at the forefront of investigations or public-facing investigative operations. My role is primarily to analyse information, identify links, interpret communication and movement data, and assist investigators by providing intelligence and analytical support. For that reason, having my name and face placed in the public domain would expose me in a manner that is inconsistent with the nature of my duties and would compromise my personal safety and the safety of my family.

14. I firmly believe that if my identity is revealed publicly, including my name and/or face, I will be placed at serious personal risk. The risk extends to my family, who may also be exposed to intimidation, threats, retaliation or physical harm as a result of my evidence and the nature of the analysis I have conducted.
15. The new analysis points to the potential involvement of a wider network of persons and entities, including possible links to persons within law enforcement agencies. These links had not previously been made or disclosed. Once revealed, they may alert persons who may be implicated and may increase the danger to me, particularly because the analysis identifies possible role players who may not yet be aware that they have been linked to the matters under investigation.
16. In addition, I do not wish to expose the analytical methods and investigative techniques used to identify illegal movements, communication patterns and the wider network of implicated persons. Disclosure of these methods, together with the new links identified through the analysis, could compromise current investigative leads, undermine ongoing and future investigations, and place me and my family at further risk.
17. I respectfully submit that the interests of justice support 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 allow me to give my evidence honestly, fully and without fear. This request is not an attempt to avoid testifying, as I remain willing to assist the Commission fully.
18. For clarity, insofar as certain aspects of the analysis have already been made public, that evidence may be presented publicly by a member of the investigation team. My request is that my evidence, which primarily concerns new leads and undisclosed analysis, be heard *in camera*.
19. I accordingly request that the Chairperson grants the relief sought in the Notice of Motion.



**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 in the week of 17 -19 June 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 for 17 - 19 June 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 **15 JUNE 2026**.



DIALE MOGASHOA ATTORNEYS

ATTORNEYS FOR COMMISSION

1ST AND 2ND FLOORS

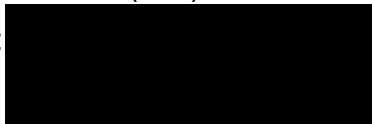
MENLYN CORNER

87 FRIKKIE DE BEER STREET

MENLYN

PRETORIA

TELEPHONE: (012) 346 5436

Email: 

TO: WILLIAM DE KLERK ATTONNEYS
ATTORNEYS FOR DAILY MAVERICK AND NEWS24
GREENSIDE 2034
LE VAL NORTH BLOCK
45 JAN SMUTS AVE
WESTCLIFF JOHANNESBURG
TELEPHONE: (011) 486 0242/3
FAX 086 610 4240
EMAIL: 

AND TO: ALL MEDIA

PRETORIA

1st and 2nd Floors | Menlyn Corner | No.87 Frikkie de Beer Street | Menlyn | Pretoria | 0181
Postal: Postnet Suite 101 | Private Bag X15 | Menlo Park | 0102 | **Docex** 49 | Brooklyn
Tel: (012) 346 5436/5939 | **Fax:** (012) 346 5962 / (086) 260 7135 | **Email:** dm@dm-inc.co.za | **Web:** www.dm-inc.co.za

CAPE TOWN: 9th Floor | Convention Tower | Cnr of Heerengracht & Walter Sisulu Avenue | Foreshore | Cape Town
8000 | **Postal:** Postnet Suite 027 | Private Bag X100 | Cape Town | 8000 | **Docex** 76 | Cape Town
Tel: (021) 100 3530 | **Fax:** (021) 100 3561 / (086) 260 7135 | **Email:** info@dm-inc.co.za



ALL MEDIA & TO WHOM IT MAY CONCERN

17 JUNE 2026

Dear All,

RE: THE JUDICIAL COMMISSION OF INQUIRY INTO CRIMINALITY, POLITICAL INTERFERENCE, AND CORRUPTION IN THE CRIMINAL JUSTICE SYSTEM ("THE COMMISSION")- APPLICATION BY EVIDENCE LEADERS FOR TESTIMONY OF WITNESS SCHEDULED FOR 18 JUNE 2026 TO BE IN – CAMERA.

1. We confirm we act for and on behalf of the Commission of Inquiry.
2. We refer to the above matter and as well as the attached application brought by the witness scheduled to appear on Thursday, 18 June 2026, supported by the evidence leaders and legal team.
3. Accordingly, please find attached the redacted application and supporting affidavit of "**Witness J**", the said application is before the Chairperson and Commissioner's for a ruling and further directives, however same is being brought to your attention to allow you an opportunity to oppose same should you wish to do so.
4. In the circumstances, should you wish to oppose same, such opposition must be within 24 hours and be delivered to the Commission, thus allowing a reply for the chair to consider and provide a ruling by **Thursday, 18 June 2026.**
5. Accordingly, please see attached application, together with founding affidavit and supporting affidavit in support of the said application.

Directors:

Madimpe Mogashoa (Chairperson)
Donald Diale
Mari Wilsnach
Tammy Jantjies
Geraldine Burger
Curwin Pokpas

Consultants:

Samvu Gumede
Ian Petherbridge
Senior Associates:
Yajana Kilawan
Vumile Vundla
Mundia Mbao
Idah Maake

Associates:

Janet Ramokoka
Vongani Nghonyama
Sebushi Lelaka
Debrah Shamuyarira
Kutloello Magoro
Basimane Poee
Miranda Mtsweni
Lefa Maphopha
Nondumiso Ngcobo
Thabiso Lesufi
Izahn Burger

Chief Operations Officer:

Michelle Morgan
Office Managers: Nelisiwe Monashane
Mapule Boikanyo
Dimakatso Molekwa
Tarryn Hendricks

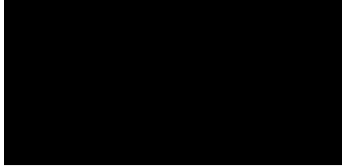
Finance Manager:

Karen Greyling
ICT Manager: Clement Tala

Co. Reg.: 2012/007603/21
VAT Reg.: 4640260487

6. We trust the above is in order.

Yours faithfully,



Geraldine Burger

Email: 