

**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 N

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 LED *IN CAMERA***

KINDLY TAKE NOTICE that the Evidence Leaders and Legal Team hereby applies to the Chairperson of the Commission, in terms of Rules 4.2 and 4.3 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 testimony of the witness scheduled to appear before the Commission on 10 July 2026 be, and any subsequent appearance before the Commission, be held partially in camera.
3. Directing that no person shall publish, broadcast, transmit or otherwise disseminate any photograph, image, likeness or visual depiction capable of identifying the witness.
4. Directing that the witness be referred to during the proceedings only by such designation as the Chairperson may determine.
5. Directing, in terms of Rule 4.3, that no person may directly or indirectly disclose the identity of the witness.
6. Directing that the witness' 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.
7. That the Chairperson shall specify in the order those persons who will be permitted to attend the in-camera proceedings.
8. 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 supporting affidavit will be used in support of this application.

DATED AT PRETORIA ON THIS 9TH DAY OF JUNE 2026.



DIALE MOGASHOA ATTORNEYS

Attorneys for the Commission

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**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.**

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

SUPPORTING AFFIDAVIT

I, the undersigned,

CURWIN NICHOLAS POKPAS

hereby make oath and state that:

- 1 I am an adult male admitted attorney of the High Court of South Africa, practising as such at Diale Mogashoa Attorneys, located at number 87 Frikkie de Beer Street, Menlyn, Pretoria ("DM Inc."). DM Inc are the attorneys on record for the Commission. I am duly authorised to depose to this affidavit.
- 2 The facts deposed to by me below are within my personal knowledge, unless otherwise stated or indicated by the context, and are, to the best of my belief, both true and correct.
- 3 The purpose of this affidavit is to bring an application for a partial in-camera hearing for a witness scheduled to appear before the Commission on 10 July 2026.



INTRODUCTION

- 4 The Evidence Leaders will, on 10 July 2025, commence with hearings relating to the Investigative Directorate Against Corruption (IDAC). To this end, various witnesses will be presented on 10 July on matters pertaining to the conduct of IDAC as an entity and/or of some of its investigating officers and management.
- 5 The witness is an adult female employed by the South African Police Service ("SAPS") as a Detective. The witness holds the rank of Sergeant and is a member of the Political Killings Task Team ("PKTT") deployed to the Eastern Cape province to investigate matters relating to the University of Fort Hare. In addition to her assignment to the PKTT, the witness is a Detective in the KZN: Anti-Corruption Unit.
- 6 The witness is scheduled to give evidence before Commission on 10 July 2026. I confirm that she has consulted with and tendered a statement to the Commission.

APPLICATION FOR PARTIAL IN CAMERA

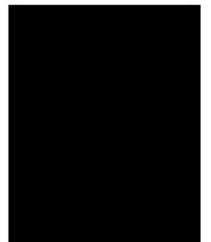
- 7 The witness' testimony before the Commission relates to information that she received regarding alleged criminal conduct on the part of Mr [REDACTED], a senior investigator at the Investigating Directorate Against Corruption ("IDAC").
- 8 The witness will testify that around January 2026, while conducting unrelated investigations in the Eastern Cape, she was introduced to a [REDACTED] [REDACTED] a foreign national who complained that he, along with other [REDACTED]

immigrant shop owners in East London, were being extorted for money in exchange for protection by [REDACTED].

- 9 She will testify that not only does [REDACTED] claim that he was extorted but he claimed he had been assaulted by [REDACTED] during September 2025 and has provided a statement (with a photograph of himself reflecting alleged injuries suffered as proof) and that despite laying a criminal complaint as per East London CAS [REDACTED] [REDACTED] has not been assisted.
- 10 The witness will explain that [REDACTED] made further allegations of criminal activity by [REDACTED], including the sale of counterfeit cigarettes, provision of fraudulent South African identity documents to undocumented immigrants in East London and loaning money at exorbitant interest to undocumented immigrants in East London. Two further associates of [REDACTED] [REDACTED] have signed statements corroborating the claims advanced by [REDACTED] [REDACTED] in so far as they relate to [REDACTED] loaning of money to vulnerable immigrant business owners in East London at exorbitant rates and on an exploitative basis.

GROUND FOR THE APPLICATION

- 11 In her statement, the witness indicates that she has come forward to assist the Commission and to provide information related to [REDACTED] of IDAC.
- 12 She however requests that her name and face be withheld for the following reasons:



- 12.1 Due to her deployment to the Eastern Cape province to investigate matters relating to the University of Fort Hare, the witness is engaged in high-profile investigations. These investigations have exposed corruption involving senior politicians and members of the university faculty. These investigations have made news headlines due to murders that have occurred and the attempted assassinations of those who are party to the investigations.
- 12.2 The witness is part of the PKTT deployed to the Eastern Cape. The manner in which they operate, requires them to work together and to attend to their investigative duties collectively. Whilst members of the general public are aware of the existence of the team, they are not aware of the individual identities of the members of the team. This level of anonymity is essential to allowing the witness and her team to do their work.
- 12.3 Should the identity of the witness become known, it will by association expose the other members of the PKTT. Therefore when the witness is seen in public along with other members of her Investigative Team, the public will through knowledge of her identity be able to identify the other members of the PKTT.
- 12.4 The anonymity protects the witness, the other members of the team, their families and their investigations.
- 12.5 The witness explains that she relies on information sourced from informants in her work. It is because the witness is relatively unknown that informers are comfortable to approach her, to be seen with her and to provide her with necessary and relevant information. Should her identity be made public,
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informers will be dissuaded from being seen with her (a known law enforcement officer) in public. Because by being seen with the witness, the identity of the informer risks being exposed. It is for this reason, that informers will be dissuaded from providing her with information.

- 12.6 Finally, the witness conducts her investigations alongside members of the Tactical Response Team or National Intervention Unit for protection. These members dress in plain clothes so as to not be identified. If the identity of the witness is made public, this carries the risk that the identities of her Protectors will also by extension be revealed.

THE REQUIREMENT FOR PUBLIC HEARINGS

- 13 The legal team is mindful of the default position as prescribed by the Regulations, that the Commission hearings are public unless there otherwise determined by the Chairperson on good cause shown. The witness' stated concerns, in our considered view, warrant a favourable consideration of the application.

- 14 Rule 4 provides as follows:

4.1. Subject to rule 4.2, the hearings of the Commission will be held in public and there must be physical attendance of all parties involved.

4.2. In an appropriate case, the Chairperson may make an order that a hearing be held in camera or via electronic means. In such a case, the Chairperson shall specify in the order those persons who will be permitted to attend the hearing in camera or by some other means.



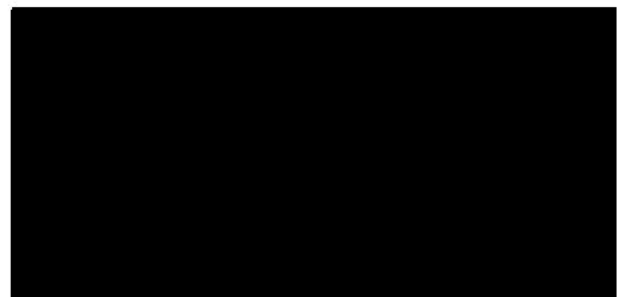
4.3. At the request of the witness whose evidence is to be heard in camera, or, mero motu, the Chairperson must order that nobody may, directly or indirectly, disclose the identity of the witness who is to give evidence in camera.

15. The Rules of the Commission therefore expressly recognise that there may be circumstances in which it is appropriate for hearings to be conducted otherwise than in public with the witness in physical attendance.

16. The legal team is of the considered opinion that the application meets the requirements of Rule 4 and therefore respectfully request that the Chairperson make an order in terms of Rule 4.2 directing that the testimony of this witness scheduled for 10 July 2026 conducted partially in-camera, where:

16.1. The witness will testify virtually with the voice heard and undistorted;

16.2. The identity of the witness will not be publicly disclosed and pictures and images of the witness will not be publicly distributed as contemplated in Rule 4.3 of the Rules of the Commission.



DEPONENT

I certify that the deponent has acknowledged that she knows and understands the contents of this affidavit, which was signed and sworn to before me at CAPE TOWN on this the 9 JULY 2026, the regulations contained in Government Notice No.



1258 of 21 July 1972, as amended by Government Notice No. 1648 of 17 August 1977, as amended having been complied with.



COMMISSIONER OF OATHS



Name:
Address:
Designation:
Capacity:



**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 legal team have brought an application before the
Commissioners for an order in the following terms:

1. Directing that the testimony of an unidentified witness whose testimony is
scheduled for 10 July 2026 be heard in-camera.

PLEASE TAKE NOTE THAT the legal team will rely on the supporting affidavit
attached hereto in support of the order sought.

DATED AT PRETORIA ON THIS 08 JULY 2026.


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TO: ALL MEDIA