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# AFFIDAVIT

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I, the undersigned,

**STEFANIE FICK**

do hereby make oath and state:

1.

I am an adult female employed as Head of Legal Affairs by the Organisation Undoing Tax Abuse ("OUTA") with its business address as 10<sup>th</sup> Floor, O'Keeffe & Swarts Building, 318 Oak Street, Ferndale, Randburg, Gauteng.


2.

The contents of this affidavit fall within my personal knowledge, unless stated otherwise and are in all aspects true and correct.

**MANDATE**

3.

The Organisation Undoing Tax Abuse ("OUTA") is a proudly South African non-profit civil action organisation, comprising of and supported by people who are passionate



about improving the prosperity of our nation. OUTA was established to challenge the abuse of authority with regards to taxpayers' money in South Africa.

4.

In recent months, South Africa has been rocked by the Gupta emails and documents ("Gupta emails") which were retrieved from the server of SAHARA Computers Pty (Ltd). These Gupta emails have substantiated most of the allegations pertaining to state capture and have unveiled evidence of misconduct by the Gupta family and many high-ranking government officials. OUTA received a copy of these emails from an unknown source, established the authenticity of such and released an extensive report on State Capture titled "No Room To Hide – A President Caught in the Act."

5.

Amongst the Gupta emails were evidence of misconduct on the part of Azwihangwisi Faith Muthambi ("Muthambi") that constitutes crimes of Corruption and High Treason. Muthambi is the Minister of Public Service and Administration of the Republic of South Africa. This misconduct occurred during Muthambi's tenure as Minister of Communication.

**BACKGROUND**

SABC

6.

On 25 May 2014, President Jacob Zuma appointed Muthambi to the Cabinet as Minister of Communications. In the Cabinet reshuffle of 30 March 2017, President Jacob Zuma retained Muthambi as a member of Cabinet, appointing her as Minister of the Public Service and Administration.

7.

On 24 February 2017, the National Assembly's *ad hoc* Committee (headed by the Hon. Mr Vincent Smith MP) found that Muthambi "...displayed incompetence in carrying out her responsibilities as Shareholder Representative [of the SABC]". The Committee noted that the evidence suggested "major shortcomings" in Muthambi's conduct, particularly in relation to the amendment of the SABC's Memorandum of Incorporation (MOI) and her role in Hlaudi Motsoeneng's ("Hlaudi") permanent appointment as Chief Operating Officer (COO). It concluded that "...the Minister interfered in some of the Board's decision-making and processes and had irregularly amended the MOI to further centralise power in the minister..." and condemned all political interference in the SABC Board's operations by Muthambi.

8.

The Committee recommended that: "The President should seriously reconsider the desirability of this particular Minister retaining the Communications portfolio".



9.

The Final Report of the *ad hoc* Committee into the Fitness of the SABC Board is annexed hereto and marked "SF1".

10.

*In Democratic Alliance v South African Broadcasting Corporation SOC Ltd and Others 2016 (3) SA 468 (WCC)*, the High Court found that Muthambi acted irrationally and unlawfully in appointing Hlaudi as Chief Operations Officer of the SABC in the face of the Public Protector's damning findings against him of abuses of power, fraud and maladministration. The court held that "*the [Minister's] decision to appoint Mr Motsoeneng, when there was a manifest need for a transparent and accountable public institution such as the SABC to exhaustively examine all of the disputes raised about his integrity and qualifications, cannot be considered as a rational decision*".

11.

The aforementioned judgement is annexed hereto and marked as "SF2".

12.

*In South African Broadcasting Corporation Soc Ltd and Others v Democratic Alliance and Others 2016 (2) SA 522 (SCA)*, the Supreme Court of Appeal made the same (albeit *prima facie*) findings against the Minister. It also criticised Muthambi for "treat[ing] with disdain" the allegation that Hlaudi's appointment was irrational and unlawful, and for raising technical objections rather than furnishing the court with an explanation of her actions. The Court advised both the Minister and the SABC that

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*"the overriding public interest obliged them to make full and frank disclosure rather than shield themselves from scrutiny by resorting to technical points in opposition.*

13.

The aforementioned judgement is annexed hereto and marked as "SF3".

14.

In *Electronic Media Network Limited and Others v E.TV (Pty) Limited and Others* 2017 (1) SA 17 (CC), the Constitutional Court expressed its concern at Muthambi's "evasive" and 'suspicious' responses or lack thereof to pertinent questions raised by E.TV, as regards consultations that she had with undisclosed parties. Chief Justice Mogoeng stated:

*"We live in a constitutional democracy, whose foundational values include openness and accountability. It is thus inappropriate for the Minister to not have volunteered the identities of those she consulted with and what the consultation was about, as if she was not entitled to solicit enlightenment or did so in pursuit of an illegitimate agenda. This conduct must be frowned upon and discouraged..."*

15.

The aforementioned judgement is annexed hereto and marked as "SF4".



*THE SAHARA EMAIL LEAKS*

16.

The Gupta emails obtained from the Sahara computer server show that between July and August 2014 – shortly after President Zuma appointed her to the Cabinet as Minister of Communications – Muthambi sent a series of emails to Tony Gupta on confidential matters of executive policy and matters in the scope of her ministerial powers. The correspondence suggests either –

- a. that the transfer of powers to her national portfolio in 2014 was influenced and vetted by the Guptas; or
- b. that Minister Muthambi used her relationship with the Guptas to influence the manner in which the President transferred powers into her portfolio.

17.

These emails were either sent directly from Muthambi to Tony Gupta or indirectly, from Muthambi to the Sahara company's CEO, Mr Ashu Chawla. Mr Chawla, in turn, forwarded Muthambi's correspondence to Tony Gupta and Duduzane Zuma, President Zuma's son. The latter appears to have acted as a conduit between the Guptas and President Zuma.

18.

On 18 July 2014, Muthambi emailed a copy of the President's Proclamation on the transfer of administration and powers to certain Cabinet members (published as



Proclamation 47 of 2014 in Government Gazette No. 37839 of 15 July 2014) to Ashu Chawla who, in turn, forwarded the email to Tony Gupta.

19.

Proclamation 47 of 2014 provided *inter alia* that all powers under the Electronic Communications Act 36 of 2005 and the Sentech Act 63 of 1996 were to be assigned to the Minister of Telecommunication and Postal Services, Minister Cwele. Previously, it was assigned to the Minister of Communications.

20.

A few minutes after emailing the Proclamation 47 of 2014 to Mr Chawla, Muthambi sent him a second email attaching a document describing the effect of the proclamation. The document contained the following statement:

*"The ability to make broadcasting policy and issue broadcasting policy directions are set out in section 3 of this Act. These powers have been transferred from the Minister of Communications to the Minister of Telecommunications and Postal Services. It is therefore the Minister of Telecommunications and Postal Service who will make policy and issue policy directives to ICASA for broadcasting, including public service broadcasting."*

21.

On 25 July 2014, Muthambi sent two emails to Mr Chawla. In the first e-mail, with the subject line "Proclamation New July 18", she wrote: "These sections must be



*transferred to the Minister of Communications.*" A document describing the statutory provisions to which she referred was attached to the e-mail under the file name "proclamtion (sic) new 18 July 2014 (clean).docx".

22.

The document named "proclamtion (sic) new 18 July 2014 (clean).docx" proposed the re-transfer of certain powers under the Electronic Communications Act 36 of 2005 from the Minister of Telecommunications and Postal Services to the Minister of Communications.

23.

In a second e-mail sent minutes later, with the subject line "*Responsibility for InfraCo and Sentech*", Muthambi wrote: "*Sentech's signal distribution must rest with the Ministry of Communications*". The attached document motivates for the transfer of powers and functions over Sentech (which is responsible for broadcasting signal distribution to the SABC and commercial broadcasters) from the Minister of Telecommunications and Postal Services to the Minister of Communications (under the Sentech Act No. 63 of 1996).

24.

Both e-mails of 25 July 2014 were subsequently forwarded by Ashu Chawla to Tony Gupta and Duduzane Zuma, in separate emails.



25.

The use by Muthambi of the word "must" in both of her emails is particularly disturbing.

It suggests one of two possibilities:

- a. Either she was conveying to Tony Gupta that these changes had to take place if the interests of the Gupta family were to be protected; or,
- b. She was instructing Tony Gupta and / or Duduzane Zuma to use his influence with President Zuma (the only person who could reassign the functions in question) to ensure that the proposed changes did take place.

26.

Included in the powers which "proclamation new 18 July 2014 (clean).docx" proposed to have retransferred to Muthambi, was the power under section 3 of the Electronic Communications Act to make national policy for the information, communications and technology sector *"to the extent that it deals in any way with a broadcasting service or an electronic communications network service used for or in the provision of broadcasting service."*

27.

On 6 December 2013, Muthambi's predecessor as Minister of Communications, Minister Carrim had started the process of exercising his power under section 3 of the Electronic Communications Act 36 of 2005, by issuing for public comment draft amendments to the broadcast digital migration technology under Government Notice

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954 of 2013.194 For present purposes, we emphasize two features of the amendments proposed by Minister Carrim:


- a. The first is that it proposed fixed dates for certain stages in the digital migration process; and,
- b. The second is that it proposed that the Government would subsidise set top boxes capable of receiving encrypted signals. This proposal was in accordance with ANC policy on the issue.

28.

As pointed out in the document that Muthambi had forwarded to Mr Chawla on 18 July 2014, in terms of the assignment of functions in Proclamation 47 of 2014, responsibility for broadcast digital migration policy now lay not with Muthambi, but with Minister Cwele. On 29 July 2014, Muthambi sent an e-mail to Chawla, with the following message: *"Despite my request, the cde is determined to table the matter in cabinet tomorrow ... He called me that he was coming to Cape Town this morning ... I hope he still on his way."*

29.

Muthambi attached a memorandum that she had sent, as Minister of Communications, to the Minister of Telecommunications and Postal Services, to Mr Cwele. In the memorandum, Muthambi noted that Minister Cwele proposed to table final amendments to the Broadcasting Digital Migration Policy in Cabinet and expressed concerns about the proposed amendments.



30.

The forwarding of this document to Mr Chawla was a gross violation of Cabinet confidentiality. Mr Chawla forwarded the e-mail and the document to Tony Gupta later that day.

31.


Minister Cwele did not obtain Cabinet approval for his proposed final amendments to the Broadcasting Digital Migration Policy, either at the cabinet meeting of 30 July 2014 or at any time thereafter.

32.

On 1 August 2014, Muthambi sent an email to Mr Chawla, to which she attached a draft of a proclamation in the name of the President for the transfer of administration, powers and functions under the Electronic Communications Act from the Minister of Telecommunications and Postal Services to the Minister of Communications. The emailed message was: "See attached Proclamation that President must sign". Again, the use of the word "must" in the email from Muthambi relating to the proposed exercise of a presidential power is disturbing.

33.

On 8 August 2014, "Ellen" of Fortune Holdings emailed Muthambi in reply, thanking her for the proposed proclamation that the President "must" sign. The email was signed by "Zandile". "Zandile" is presumably Zandile Ellen Tshabalala, the Chairperson of the SABC at the time. "Zandile" copied Mr Chawla and a certain Khumalo at the SABC on this correspondence.



34.

The draft Presidential proclamation was never promulgated in the self-contained form attached to the emails between Muthambi, Mr Chawla and Tony Gupta. However, on 2 December 2014 the President Promulgated Proclamation 79 of 2014 which transferred to the Minister of Communications a range of powers including the power to make national policy on information, communications and technology under section 3 of the Electronic Communications Act insofar as it relates to broadcasting.

35.

The aforementioned emails and the related promulgations are attached in a bundle and marked as "SF5".

36.

With policy on Broadcast Digital Migration safely now under her control, Muthambi published her amendments to the policy on 18 March 2015 under Government Notice 232 of 2015. The final policy included neither of the two features mentioned above in Minister Carrim's published draft of December 2013:

- a) The policy no longer tied the Government to any dates for the digital migration process; and,
- b) The policy provided that Government subsidised set top boxes would not be capable of receiving encrypted signals. It thus reversed Minister Carrim's proposal which had been in accordance with ANC policy, and replaced it with a decision that was contrary to ANC policy. In changing



the policy in this manner, Muthambi provoked criticism in a public statement issued by the Tri-Partite Alliance in February 2015.

37.

As pointed out above, when Muthambi was taken to Court by e-TV for her failure to consult publicly in relation to the changed provisions regarding encryption, the Constitutional Court commented on her "evasive and suspicious" responses relating to the identity of the persons with whom she had consulted in relation to the changes that she made (see paragraph 14 *supra*). In the light of the emails described above, the reasons for this evasiveness are evident.


38.

The communications described above between Muthambi, Mr Chawla and Tony Gupta amount to an abuse of her office. There is no reasonable explanation for communications of this nature between the Minister of Communications and members of the Gupta group who control a television station subject to her regulatory jurisdiction.

*THE MINISTER'S APPOINTMENT OF HLAUDI MOTSOENEG AS COO OF THE SABC*

39.

On 8 July 2014, Muthambi appointed Hlaudi as permanent COO of the SABC, despite the Public Protector's findings and remedial action. The High Court and Supreme Court of Appeal found that the Minister's decision was, on the face of it, irrational and unlawful.



40.

The Public Protector's Report, "*When Governance and Ethics Fail*", is annexed hereto and marked as "SF 6".

41.

The explanation for Muthambi's protection and promotion of Hlaudi – notwithstanding his abuses of power at the SABC – appears to lie, at least in part, in the Minister and Hlaudi shared improper relationship with the Guptas.

42.

As Group Chief Executive of Stakeholder Relations at the SABC (April 2011-November 2011), and later as acting COO (November 2011-July 2014) and permanent COO (July 2014 – November 2015) of the SABC, Hlaudi promoted the SABC's so-called "business relationship" with the Gupta's media company, TNA Media Group (Pty) Ltd.

43.

Under Hlaudi, the SABC concluded agreements with TNA Media in terms of which the SABC would broadcast the New Age "Business Breakfasts" at a loss to the SABC, while TNA Media amassed considerable profits and media exposure from the broadcasts.

44.

Parliament's *ad hoc* Committee on the SABC noted in its report that –

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- a. SABC producer, Mr Vuyo Mvoko gave evidence that SABC resources were diverted to fund ANN7, the Gupta-owned news channel. He indicated that the SABC's Morning Live resources were diverted to pay for the production costs associated with the TNA Business Breakfasts. The SABC did not generate any revenue from the briefings.
- b. The former acting Group CEO of the SABC (between July 2011 to January 2012), Mr Phil Molefe *"corroborated evidence that the SABC bore costs associated with the Business Breakfasts. In his submission he indicates that the shows came at a huge cost to the SABC. Technical equipment for one production could cost R1 million or more. In addition, the SABC had to cover the flights, accommodation and subsistence of its production staff when the briefings took place outside of Johannesburg. Mr Molefe confirms that while the SABC carried the production costs, the TNA Media Group earned the revenue exclusively."*

45.

In addition, the SABC paid huge subscriptions to the Gupta-owned New Age newspaper. This escalated from R238,356 in 2011 to close to a R1 million in 2015/2016.

46.

During the Parliamentary inquiry into the SABC, Mr Molefe made a serious allegation that, in November 2011, he was pressured by Hlaudi and then Chairperson of the SABC, Dr Ben Ngubane to increase Hlaudi's salary by R500,000. When he refused, Hlaudi allegedly said to Dr Ben Ngubane: *"Chair, I told you that this is not our man. So*



*I'm going to Pretoria tonight". This reported conversation suggests that Hlaudi was protected not only by Muthambi, but also by President Zuma.*

47.

Hlaudi's gross abuses of power at the SABC – which included diverting public resources vested in the SABC to benefit the Gupta's rival media company – appear to have been sanctioned by both Muthambi and President Zuma.

## **CHARGES**

### **High Treason**

48.

In terms of **Section 96** of our Constitution:

- "(1) Members of the Cabinet and Deputy Ministers must act in accordance with a code of ethics prescribed by national legislation.*
- (2) Members of the Cabinet and Deputy Ministers may not-*
- (a) undertake any other paid work;*
  - (b) act in any way that is inconsistent with their office, or expose themselves to any situation involving the risk of a conflict between their official responsibilities and private interests; or*



- (c) *use their position or any information entrusted to them, to enrich themselves or improperly benefit any other person.*"

49.

Furthermore, each Minister must swear/affirm before the Chief Justice or another judge designated by the Chief Justice, as follows:

*"I, \_\_\_\_\_, swear/solemnly affirm that I will be faithful to the Republic of South Africa and will obey, respect and uphold the Constitution and all other law of the Republic; and I undertake to hold my office as Minister/Deputy Minister with honour and dignity; to be a true and faithful counsellor; **not to divulge directly or indirectly any secret matter entrusted to me**; and to perform the functions of my office conscientiously and to the best of my ability."*

50.

We allege that Muthambi's conduct, as detailed above, constitutes high treason as it violated, threatened and endangered the existence, independence and security of the Republic of South Africa, or had the effect or potential effect of changing the Constitutional structure of the Republic of South Africa.

51.

Muthambi, as a citizen of the Republic of South Africa and Minister of Communications, unquestionably owed her allegiance to the Republic. She intentionally and unlawfully participated in email exchanges with Ashu Chawla, Tony



Gupta and Duduzane Zuma which violated, threatened and endangered the existence, independence and security of the Republic.

52.

In terms of **Section 51(1)** of the Criminal Law Amendment Act 105 of 1997 (subject to subsections (3) and (6)), a Regional Court or a High Court shall sentence a person it has convicted of High Treason, to imprisonment for life.

### **Corruption**

53.

We allege that Muthambi's conduct, as detailed above, constitutes contraventions of the following sections of The Prevention and Combating of Corrupt Activities Act 12 of 2004 ("POC"):

1. **Section 3** of the POC, which states:

*"Any person who, directly or indirectly-*

- (a) accepts or agrees or offers to accept any gratification from any other person, whether for the benefit of himself or herself or for the benefit of another person; or*
- (b) gives or agrees or offers to give to any other person any gratification, whether for the benefit of that other person or for the benefit of another person, in order to act, personally or by influencing another person so to act, in a manner-*

- (i) *that amounts to the-*
  - (aa) *illegal, dishonest, unauthorised, incomplete, or biased; or*
  - (bb) *misuse or selling of information or material acquired in the course of the, exercise, carrying out or performance of any powers, duties or functions arising out of a constitutional, statutory, contractual or any other legal obligation;*
- (ii) *that amounts to-*
  - (aa) *the abuse of a position of authority;*
  - (bb) *a breach of trust; or*
  - (cc) *the violation of a legal duty or a set of rules,*
- (iii) *designed to achieve an unjustified result; or*
- (iv) *that amounts to any other unauthorised or improper inducement to do or not to do anything, is guilty of the offence of corruption."*

2. **Section 4** of the POC, which states:

*"(1) Any-*

- (a) *public officer who, directly or indirectly, accepts or agrees or offers to accept any gratification from any other person, whether for the benefit of himself or herself or for the benefit of another person; or*



(b) *person who, directly or indirectly, gives or agrees or offers to give any gratification to a public officer, whether for the benefit of that public officer or for the benefit of another person, in order to act, personally or by influencing another person so to act, in a manner-*

(i) *that amounts to the-*

(aa) *illegal, dishonest, unauthorised, incomplete, or biased; or*

(bb) *misuse or selling of information or material acquired in the course of the, exercise, carrying out or performance of any powers, duties or functions arising out of a constitutional, statutory, contractual or any other legal obligation;*

(ii) *that amounts to-*

(aa) *the abuse of a position of authority;*

(bb) *a breach of trust; or*

(cc) *the violation of a legal duty or a set of rules;*

(iii) *designed to achieve an unjustified result; or*

(iv) *that amounts to any other unauthorised or improper inducement to do or not to do anything, is guilty of the offence of corrupt activities relating to public officers.*



(2) Without derogating from the generality of section 2 (4), 'to act' in subsection (1), includes-

- (a) voting at any meeting of a public body;
- (b) performing or not adequately performing any official functions;
- (c) expediting, delaying, hindering or preventing the performance of an official act;
- (d) aiding, assisting or favouring any particular person in the transaction of any business with a public body;
- (e) aiding or assisting in procuring or preventing the passing of any vote or the granting of any contract or advantage in favour of any person in relation to the transaction of any business with a public body;
- (f) showing any favour or disfavour to any person in performing a function as a public officer;
- (g) diverting, for purposes unrelated to those for which they were intended, any property belonging to the state which such officer received by virtue of his or her position for purposes of administration, custody or for any other reason, to another person; or
- (h) exerting any improper influence over the decision making of any person performing functions in a public body."



3. **Section 7** of the POC, which states:

*"(1) Any-*

*(a) member of the legislative authority who, directly or indirectly, accepts or agrees or offers to accept any gratification from any other person, whether for the benefit of himself or herself or for the benefit of another person; or*

*(b) person who, directly or indirectly, gives or agrees or offers to give any gratification to a member of the legislative authority, whether for the benefit of that member or for the benefit of another person, in order to act, personally or by influencing another person so to act, in a manner-*

*(i) that amounts to the-*

*(aa) illegal, dishonest, unauthorised, incomplete, or biased; or*

*(bb) misuse or selling of information or material acquired in the course of the, exercise, carrying out or performance of any powers, duties or functions arising out of a constitutional, statutory, contractual or any other legal obligation;*

*(ii) that amounts to-*

*(aa) the abuse of a position of authority;*


*(bb) a breach of trust; or*



- (cc) *the violation of a legal duty or a set of rules;*
- (iii) *designed to achieve an unjustified result; or*
- (iv) *that amounts to any other unauthorised or improper inducement to do or not to do anything,*

*is guilty of the offence of corrupt activities relating to members of the legislative authority.*

(2) *Without derogating from the generality of section 2 (4), 'to act' in subsection (1) includes-*

- (a) *absenting himself or herself from;*
  - (b) *voting at any meeting of;*
  - (c) *aiding or assisting in procuring or preventing the passing of any vote in;*
  - (d) *exerting any improper influence over the decision making of any person performing his or her functions as a member of; or*
  - (e) *influencing in any way, the election, designation or appointment of any functionary to be elected, designated or appointed by, the legislative authority of which he or she is a member or of any committee or joint committee of that legislative authority."*
- 

4. **Section 21** of the POC, which states:

*"Any person who-*

- (a) attempts;*
- (b) conspires with any other person; or*
- (c) aids, abets, induces, incites, instigates, instructs, commands, counsels or procures another person, to commit an offence in terms of this Act,*

*is guilty of an offence."*

5. **Section 34** of the POC, which states:

*"(1) Any person who holds a position of authority and who knows or ought reasonably to have known or suspected that any other person has committed-*

- (a) an offence under Part 1, 2, 3 or 4, or section 20 or 21 (in so far as it relates to the aforementioned offences) of Chapter 2; or*



- (b) *the offence of theft, fraud, extortion, forgery or uttering a forged document, involving an amount of R100 000 or more;*

*must report such knowledge or suspicion or cause such knowledge or suspicion to be reported to the police official in the Directorate for Priority Crime Investigation referred to in section 17C of the South African Police Service Act, 1995, (Act 68 of 1995)."*

54.

In terms of **Section 26** of POC:

*"(1) Any person who is convicted of an offence referred to in-*

*(a) Part 1, 2, 3 or 4, or section 18 of Chapter 2, is liable-*

- (i) in the case of a sentence to be imposed by a High Court, to a fine or to imprisonment up to a period for imprisonment for life;*
- (ii) in the case of a sentence to be imposed by a regional court, to a fine or to imprisonment for a period not exceeding 18 years; or*
- (iii) in the case of a sentence to be imposed by a magistrate's court, to a fine or to imprisonment for a period not exceeding five years.*

- (3) *In addition to any fine a court may impose in terms of subsection (1) or (2), the court may impose a fine equal to five times the value of the gratification involved in the offence."*

55.

With reference to the contents of this affidavit, I humbly request that the elements of criminal activities such as, but not limited to, high treason and corruption be thoroughly investigated by the SAPS and other relevant law enforcement authorities.

Signed at **RANDBURG** on this 17<sup>TH</sup> day of **JULY 2017**.



A large, stylized handwritten signature in black ink, appearing to read 'Stefanie Fick', is written over a horizontal line.

STEFANIE FICK

I certify that the deponent has acknowledged that she understands the contents of the above declaration and has no objections to taking the prescribed oath or affirmation and that she considers the prescribed oath or affirmation binding on her conscience.



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Signed and sworn before me, at Randburg on this 17<sup>th</sup> day of July 2017.



Commissioner of Oaths

Name: \_\_\_\_\_

Office: \_\_\_\_\_

Address: \_\_\_\_\_

**LERISSA GOVENDER**  
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