

IN THE CONSTITUTIONAL COURT OF SOUTH AFRICA**CASE NO: CCT 103/25
CCT 144/25**

In the matter between:

PREMIER OF THE WESTERN CAPE GOVERNMENT First Applicant**AMABHUNGANE CENTRE FOR INVESTIGATIVE
JOURNALISM NPC** Second Applicant

and

SPEAKER OF THE NATIONAL ASSEMBLY First Respondent**CHAIRPERSON OF THE NATIONAL COUNCIL OF
PROVINCES** Second Respondent**MINISTER OF FINANCE** Third Respondent

And in the matter between:

THE CITY OF CAPE TOWN Applicant**AMABHUNGANE CENTRE FOR INVESTIGATIVE
JOURNALISM NPC** Second Applicant

and

THE SPEAKER OF THE NATIONAL ASSEMBLY First RespondentHandwritten signatures in black ink, appearing to be initials or names, located at the bottom right of the page.

THE CHAIRPERSON OF THE NATIONAL COUNCIL OF PROVINCES	Second Respondent
THE MINISTER OF FINANCE	Third Respondent
THE PRESIDENT OF THE REPUBLIC OF SOUTH AFRICA	Fourth Respondent
THE SPEAKER OF THE EASTERN CAPE PROVINCIAL LEGISLATURE	Fifth Respondent
THE SPEAKER OF THE FREE STATE PROVINCIAL LEGISLATURE	Sixth Respondent
THE SPEAKER OF THE GAUTENG PROVINCIAL LEGISLATURE	Seventh Respondent
THE SPEAKER OF THE KWAZULU-NATAL PROVINCIAL LEGISLATURE	Eighth Respondent
THE SPEAKER OF THE LIMPOPO PROVINCIAL LEGISLATURE	Ninth Respondent
THE SPEAKER OF THE MPUMALANGA PROVINCIAL LEGISLATURE	Tenth Respondent
THE SPEAKER OF THE NORTHERN CAPE PROVINCIAL LEGISLATURE	Eleventh Respondent
THE SPEAKER OF THE NORTH WEST PROVINCIAL LEGISLATURE	Twelfth Respondent

A. h. 7.

**THE SPEAKER OF THE WESTERN CAPE
PROVINCIAL LEGISLATURE**

Thirteenth Respondent

**ANSWERING AFFIDAVIT IN RESPONSE TO SECOND APPLICANT'S
CONSOLIDATED FOUNDING AFFIDAVIT**

A. h. T.

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8 a 2.

I, the undersigned

ANGELA THOKOZILE DIDIZA

hereby state under oath:

1. I am an adult female. I am the Speaker of the National Assembly of the Republic of South Africa. I am duly authorized to depose to this answering affidavit on behalf of –
 - 1.1. the first to third respondents in the application brought by the Premier of the Western Cape Government under case number CCT 103/25 (**“Premier’s application”**); and
 - 1.2. the first, second, third, fifth, sixth, tenth, eleventh and twelfth respondents in the application brought by the City of Cape Town under case number CCT 144/25 (**“City’s application”**).
2. For the sake of convenience, where I refer to these respondents collectively in this affidavit, I will refer to them as **“the respondents”**.
3. I am advised that a separate confirmatory affidavit deposed to on behalf of the Minister of Finance, the third respondent in both the Premier's application and in the City's application, will be filed. That affidavit will confirm the allegations that fall within the personal knowledge of the Minister of Finance and/or National Treasury.



4. Unless the context indicates otherwise, the facts to which I depose in this affidavit fall within my personal knowledge or are obtained from official records of Parliament and the provincial legislatures, and, to the best of my belief, are both true and correct. The statements of law that I make in this affidavit are made on the advice of the respondents' legal representatives, which I believe to be correct.
5. In this affidavit, I use the same abbreviations and nomenclature as those used in the answering affidavits in the Premier's application and the City's application.
6. I have read the consolidated founding affidavit, deposed to by Lungelo Caroline James, filed on behalf of the second applicant. I respond to its contents below. I humbly request that the Court considers this affidavit together with the respondents' main answering affidavits in the Premier's application and the City's application. I therefore do not repeat the allegations made in those affidavits, but respond only to the new issues raised and new allegations made by the second applicant.
7. To this end, I address the following topics below:
 - 7.1. First, I address the privilege that attaches to comments made by members of Parliament in the course of their official duties;

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- 7.2. Second, I deal with why comments made by individual members of Parliament cannot be attributed to Parliament as a whole;
- 7.3. Third, I outline the remedies available to the second applicant should it wish to pursue a grievance regarding any statements or remarks made in Parliament by individual members;
- 7.4. Fourth and finally, I provide paragraph-by-paragraph responses to the second applicant's consolidated founding affidavit.

PARLIAMENTARY PRIVILEGE

8. The second applicant makes reference to statements made by a number of individual members of Parliament. Relying on these alleged individual statements, the second applicant asks the Court to draw inferences regarding the sufficiency of the public participation process followed by Parliament, as a whole.
9. I am advised and submit that the second applicant's attempted reliance on individual parliamentary statements cannot properly serve the second applicant's intended objectives:
 - 9.1. As an evidentiary matter, specific individual statements, which are recorded as having been made by individual members within a parliamentary context, cannot stand as proof of the truth of the content of those statements. From a probative perspective, such statements can rarely rise higher than mere assertion.

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- 9.2. As a matter of logic, to use specific individual statements as the basis for reaching general conclusions concerning the adequacy of the process of Parliament, as a whole, is to use a 'bottom-up' (or inductive) mode of reasoning which is inherently unreliable, particularly in the context of assessing national legislation with respect to its constitutional validity. It is submitted that the *dictum* of the SCA in its decision in ***Natal Joint Municipal Pension Fund v Endumeni Municipality 2012 (4) SA 593 (SCA)***, at para 20, is instructive in this regard:

"Taking Parliament by way of example, legislation is drafted by legal advisers in a ministry, redrafted by the parliamentary draftsmen, subjected to public debate in committee, where it may be revised and amended, and then passed by a legislative body, many of whose members have little close acquaintance with its terms and are motivated only by their or their party's stance on the broad principles in the legislation. In those circumstances to speak of an intention of parliament is entirely artificial".

- 9.3. The second applicant's allegations concerning the specific, individual statements on which attempts to rely fall short of the requirements applicable to the drawing of judicial inferences in such circumstances. Individual statements may be made for a number of reasons and motivated by a number of factors that threaten their accuracy. The second applicant has not shown that the inferences it advocates are the most readily apparent and acceptable inferences that can be drawn from the existing inferences. The allegations permit more than one inference. There is no basis laid for this Court to find that the most plausible or probable inference to be drawn is the insufficiency of Parliament's public participation process.

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10. Over and above these reasons, I am advised and submit that the second applicant's assertions should be rejected for an interrelated reason which is even more fundamental: its attempt to attach legal consequences to remarks made by members of Parliament in the course of the parliamentary process is in breach of the constitutional and statutory protection of parliamentary privilege.

11. Section 58 of the Constitution provides in relevant part as follows:

- (1) Cabinet members, Deputy Ministers and members of the National Assembly –*
 - (a) have freedom of speech in the Assembly and in its committees, subject to its rules and orders; and*
 - (b) are not liable to civil or criminal proceedings, arrest, imprisonment or damages for –*
 - (i) anything that they have said in, produced before or submitted to the Assembly or any of its committees; or*
 - (ii) anything revealed as a result of anything that they have said in, produced before or submitted to the Assembly or any of its committees.*
- (2) Other privileges and immunities of the National Assembly, Cabinet members and members of the Assembly may be prescribed by national legislation.*
- (3) . . .*

12. The legislation contemplated in section 58(2) of the Constitution is the Powers, Privileges and Immunities of Parliament and Provincial Legislatures Act 4 of 2004 ("**Powers and Privileges Act**"). Section 22 of the Powers and Privileges Act provides as follows:

No person is liable for damages or otherwise for any act done in good faith in terms of this Act, or under the authority of a House or committee and within the legal powers of the House or committee, or under any order or summons issued by virtue of those powers.

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13. Section 28 of the Powers and Privileges Act provides that section 22 applies to the provincial legislatures as well.
14. The purpose of this parliamentary privilege is to enable members of Parliament to discuss and debate the issues before them freely and openly, without being constrained by the possibility of adverse consequences. This freedom of speech is a cornerstone of our constitutional democracy, preserving the integrity of parliamentary discussion and debate without the chilling effect of the threat of litigation. It preserves the political process and encourages members to speak freely and openly on behalf of their constituents.
15. I am advised that, for this reason, the Courts have interpreted and applied the above provisions as an immunity against legal consequences for comments made by members of Parliament in their official capacities. If members of Parliament are constrained in their discussions and interactions, this would have a profound impact on their essential function, undermining our constitutional democracy.
16. The second applicant's attempt to place direct reliance on comments made by individual members of Parliament in support of its challenge to the Procurement Act is therefore precluded by parliamentary privilege. The remarks made by members and referred to in the second applicant's consolidated founding affidavit were part of a rigorous and robust debate. This is, in fact, indicative of

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Parliament's appreciation of the gravity and importance of the Procurement Act and the diverse interests and considerations to take into account.

STATEMENTS BY INDIVIDUAL MEMBERS CANNOT BE ATTRIBUTED TO PARLIAMENT AS A WHOLE

17. It is trite that at the heart of our constitutional democracy is robust parliamentary debate: members of Parliament represent different political parties and different constituencies, each with their own political perspectives and interests. The democratic constitutional design is such that the diversity of South African people is represented in Parliament, and that their views are expressed and interests advanced by their elected representatives.
18. An inevitable consequence of this is that there will be a diversity of views and opinions among members of Parliament. It is through rigorous discussion and debate that these views and opinions are effectively ventilated, and that informed decisions throughout the legislative and other processes, which decisions reflect the majority will, may be taken.
19. With this in mind, the second applicant's attempts to attribute comments made by individual members to Parliament as a whole are mistaken, for reasons including those I have already foreshadowed. In some cases, those members' views may be shared; in other cases, they will not. But the statements made by individual members will never be an accurate representation of the attitude adopted by Parliament as a whole.

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20. The best reflection of Parliament's attitude and approach is the legislation that is ultimately enacted after public comments have been given due consideration. That said, I reiterate the statement in my main answering affidavit in the Premier's application and the City's application that Parliament is bound to consider – but not necessarily incorporate – comments received from stakeholders during the public participation process.
21. The second applicant's apparent painstaking identification of individual comments made by individual members of Parliament, therefore, cannot be relied on in support of a challenge to the process as a whole. While the views expressed may or may not indicate an individual's approach to certain interest groups, they certainly cannot be extrapolated to paint a clear picture of what the second applicant describes as apparent widespread resistance to submissions from civil society organisations.
22. What these comments do illustrate is open and frank discussion among members with different perspectives. I am advised and submit that this is precisely what ought to happen in the course of enacting legislation, particularly legislation of such significance.
23. For this reason, I do not in this affidavit provide detailed responses in defence or otherwise of the statements made during the process of enactment of the Procurement Act. To do so would be to undermine the importance of ventilation by all members of all views, rather than the selective endorsement of only those views that promote a particular agenda.

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REMEDIES ARISING FROM THE POWERS AND PRIVILEGES ACT

24. The basis of the second applicant's approach to the Court is comments made by individual members of Parliament during the course of the public participation process.
25. The second applicant's remedy, however, does not lie in a constitutional challenge before this Court, but rather in the Powers and Privileges Act.
26. Section 25 of the Powers and Privileges Act provides as follows:

Protection of members of public

- (1) A person, other than a member, who feels aggrieved by a statement or remark made by a member or a witness in or before a House or committee about that person, may submit a written request to the Secretary to have a response recorded.*
- (2) The committee referred to in section 12 (2) must, subject to the standing rules, consider the request and, if approved, publish the response of the aggrieved person in the appropriate parliamentary paper.*

27. I am advised and submit that this constitutes an adequate remedy for any grievance raised by the second applicant in respect of the conduct of individual members of Parliament. Where such a remedy exists, it would, I respectfully submit, be inappropriate for this Court to undermine that process by granting the relief sought by the second applicant. The subsidiarity principle would also apply.

PARAGRAPH-BY-PARAGRAPH RESPONSES

28. I now turn to respond *ad seriatim* to the content of the second applicant's consolidated founding affidavit. In doing so, I have done my utmost to respond



to each and every allegation made by the second applicant. Where I have not responded to a particular allegation, and where it is inconsistent with what is stated elsewhere in this affidavit, that allegation is denied.

Ad paras 1 – 4

29. Save to deny that the content of the consolidated founding affidavit is true and correct, the content of these paragraphs is admitted.

Ad paras 5 – 9

30. Save to deny that Parliament and the provincial legislatures failed to facilitate meaningful public participation in the passing of the Procurement Act, the content of these paragraphs is noted.

Ad para 10

31. For the reasons set out above and in the main answering affidavits in the Premier's application and the City's application, I deny that there is merit to any of the assertions in this paragraph.

Ad para 11

32. The content of this paragraph is admitted.

Ad para 12

33. For the reasons set out above and in the main answering affidavits in the Premier's application and the City's application, I deny that it was necessary to

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embark on a further round of public comments after the amendments to Chapter Four were made.

Ad para 13

34. I deny that there is a legal duty on Parliament to demonstrate that it gave serious consideration to each of the submissions it received. The respondents' main answering affidavits in the Premier's application and the City's application deal with the standard applicable to Parliament's public participation process.
35. In any event, and for the reasons set out above and in the main answering affidavits in the Premier's application and the City's application, I submit that Parliament has demonstrated compliance with its meaningful public participation obligations, including the consideration of submissions received from all stakeholders.

Ad paras 14 – 19

36. The content of these paragraphs is admitted.

Ad paras 20 – 24

37. The content of these paragraphs is admitted.

Ad paras 25 – 29

38. For the reasons set out above, I deny that the individual comments made by Mr Manyi and Ms Abraham are reflective of a general resistance by Parliament to input from civil society organisations. The second applicant's contention that

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this is the case amounts to a fundamental misunderstanding of the applicable legal principles, the democratic process required under the Constitution and the role of parliamentary privilege.

Ad paras 30 – 31

39. The second applicant's suggestion that Mr Maswanganyi ought to "*call members to order*" and discourage the debate about the submissions made by stakeholders is concerning. As I have addressed above, the parliamentary process depends on members' - openly debating matters without fear of legal repercussions therefor.

Ad paras 32 – 51

40. The contention that National Treasury did not consider all of the submissions received is addressed in the main answering affidavits in the Premier's application and the City's application. I stand by what is stated in those affidavits. I deny that National Treasury and Parliament failed to consider adequately the submissions received.

Ad paras 52 – 55

41. I admit the content of these paragraphs.

Ad paras 56 – 59

42. I have addressed the time-sensitivities in my main answering affidavits in the Premier's application and the City's application. To the extent that the

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allegations in these paragraphs are inconsistent with that allegation, they are denied.

43. I further reiterate what I stated above regarding statements by members of Parliament and the privilege attached thereto. The second applicant's attempt to attach legal consequence to the statements referred to ought, for the reasons set out above, to be rejected.

Ad paras 60 – 65

44. The content of these paragraphs is admitted.
45. I point out that the reason that the second applicant was not invited to the briefing held on 19 March 2024 is that it opted not to make oral submissions; only those stakeholders who wished to make oral submissions were invited.
46. I further reiterate what I stated above regarding the weight of comments made by individual members. I deny that the comment referred to in paragraph 62 of the consolidated founding affidavit supports the assertion of resistance against civil society organisations.

Ad para 66

47. I admit that stakeholders were able to offer important insights into the subject matter of the Procurement Act. Many of them did so. I deny, however, that this obliges Parliament to amend its draft legislation to incorporate all such insights; as I have addressed in my main answering affidavits in the Premier's application

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and the City's application, Parliament's duty is to consider those submissions and nothing more.

Ad paras 67 – 68

48. I reiterate what I have stated above regarding statements by members of Parliament and the privilege attaching thereto. The second applicant's attempt to attach legal consequence to the statements referred to ought, for the reasons set out above, to be rejected.

Ad para 69

49. As I have addressed above, the second applicant was not invited to the briefing because it had opted not to make oral submissions. Only those who wished to make oral submissions received an invitation to the briefing.

50. There was, however, nothing precluding the second applicant from attending the briefing, which was open to the public in any event. Moreover, there was nothing precluding the applicant from requesting leave to make supplementary written submissions. As is clear from paragraph 75 of its affidavit, it asked for, and was granted, leave to do so.

Ad paras 70 – 71

51. I do not dispute the content of these paragraphs. It must be kept in mind, however, that the allegations relate to supplementary submissions made by civil society. In other words, all of those who made supplementary submissions had



already had the opportunity to make full submissions. Therefore, the decision to limit the length of the supplementary submissions was reasonable.

Ad paras 72 – 74

52. I have addressed the time sensitivities in my main answering affidavits in the Premier's application and the City's application. I deny the allegations of a rushed process and self-created urgency.

53. I further reiterate what I stated above regarding statements by members of Parliament and the privilege attaching thereto. The second applicant's attempt to attach legal consequence to the statements referred to ought, for the reasons set out above, to be rejected.

Ad para 75

54. The content of this paragraph is admitted.

Ad paras 76 – 78

55. I deny that the content of these paragraphs has any probative value for reasons I have already traversed. I furthermore deny that it is relevant and admissible evidence on which a Court will rely in order to reach the conclusion intended by the second applicant.

Ad paras 79 – 80

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56. I admit the content of these paragraphs to the extent they are consistent with the letter to which reference is made in the paragraphs under reply and the report attached to the second applicant's affidavit as annexure CFA5.

Ad paras 81 – 82

57. For the reasons set out above, I deny that the individual comments made by Mr Carrim are reflective of a general dismissive approach by Parliament of input from civil society organisations, and I deny that they may competently be considered as such.

Ad para 83

58. I deny that the public participation process followed by Parliament was inadequate. I further deny that Parliament was required to supplement the public participation process in any way.

Ad paras 84 – 85

59. For the reasons set out above, I deny that the individual comments made by Mr Carrim are reflective of a general dismissive approach by Parliament of input from civil society organisations, and I deny that they may be competently considered as such.

Ad para 86

60. The content of this paragraph is admitted.

Ad paras 87 – 88



61. The content of these paragraphs is admitted.

Ad paras 89 – 90

62. For the reasons set out above, I deny that the individual comments made by Mr Carrim are reflective of a general dismissive approach by Parliament of input from civil society organisations, and I deny that they may be competently considered as such.

Ad paras 91 – 92

63. While I admit that the meetings referred to in the paragraphs under reply occurred, and I admit the allegations in these paragraphs to the extent they are consistent with the content of the report attached to the second applicant's affidavit as annexure CFA7, I deny the meaning or outcome the second applicant seeks to attribute to them.

Ad paras 93 – 94

64. For the reasons set out above, I deny that the individual comments made by Mr Carrim are reflective of a general dismissive approach by Parliament of input from civil society organisations, and I deny that they may be competently considered as such.

Ad paras 95 – 96

65. While I admit that the events referred to in the paragraphs under reply occurred, and I admit the allegations in these paragraphs to the extent that they are consistent with the content of the report attached to the second applicant's

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affidavit in its intervention application as annexure FA20, I deny the meaning or outcome the second applicant seeks to attribute to them.

Ad paras 97 – 99

66. Sections 76(1)(c) and (d) of the Constitution provide that, where the NCOP refers an amended Bill back to the NA, the NA has the power only to pass the amended Bill and submit it to the President for assent, or to reject the amended Bill and refer the matter to the Mediation Committee. The suggestion by the second applicant that the NA could take any steps other than those contemplated in section 76 of the Constitution is denied.

Ad paras 100 – 101

67. The content of these paragraphs is admitted.

Ad para 102

68. For the reasons set out above, the content of this paragraph is denied.

Ad paras 103 – 111

69. I deny that there was a failure by National Treasury to consider all submissions. I refer to what was stated in the main answering affidavits in the Premier's application and the City's application.

Ad paras 112 – 117

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70. I deny that National Treasury's engagement with submissions received from members of the public was weak, and I refer to what is stated in the main answering affidavits in the Premier's application and the City's application.

Ad paras 118 – 122

71. The content of these paragraphs is denied. I refer to what is stated in the main answering affidavits in the Premier's application and the City's application.

Ad para 123

72. I deny that the second applicant has made out a case for the relief sought.

CONDONATION

73. On 2 October 2025 this Court issued directions in terms of which the second applicant was to file its founding affidavit by 23 October 2025, and the respondents were to file their answering affidavits by 13 November 2025.

74. This affidavit will be filed on 19 November 2025, four court days late. I submit with respect that the delay is not significant and that there is a reasonable explanation therefor.

75. I am advised and submit that the overriding consideration in considering an application for condonation is the interests of justice, which is informed by the following factors:

75.1. The extent of the delay;

75.2. The reasons for the delay;

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- 75.3. Any prejudice arising from the delay; and
- 75.4. The respondents' prospects of success in the main application.
76. I submit that a consideration of these factors favours condonation being granted.
77. At the outset, it is necessary to emphasise my sincere apologies to the Court and to the second applicant for the delay in filing this affidavit and any inconvenience that may have arisen as a result thereof. The delay did not arise from any wilful disrespect for this Court or the second applicant.
78. The second applicant's affidavit was served on the respondents' attorneys on 23 October 2025 and circulated to the respondents and to counsel the following morning. Following receipt of the affidavit and perusal of its contents, it was necessary for the respondents' counsel to take detailed instructions for the purpose of this affidavit, and in doing so to collate the instructions and documents received from the NA, the NCOP and National Treasury.
79. While every effort was made to meet the deadline of 13 November 2025, the extent and breadth of the instructions required, and the number of people whose input was necessary, rendered it impractical to do so. I confirm that this affidavit was drafted and finalised as soon as reasonably possible after all the necessary instructions had been collated.
80. I submit that the second applicant cannot meaningfully claim any prejudice if the application for condonation is successful. The Procurement Act has not yet



been brought into operation, nor is its commencement imminent. The main application has also not been set down for hearing.

81. On the other hand, if condonation is refused, the respondents would not be able to put their case before the Court, despite the substantial impact that any relief granted by this Court may have.
82. In addition, a refusal of condonation would not only cause prejudice to the respondents, but it would also have a negative impact on the Court's ability to assess the process followed by them in enacting the Procurement Act. I am advised and submit that this is a particularly relevant factor when Courts are faced with constitutional challenges to legislation.
83. I further submit, for the reasons set out above and in the main answering affidavits in the Premier's application and the City's application, that the respondents have good prospects of success in opposing the relief sought.
84. Arising from the above, I submit that the respondents have demonstrated that the interests of justice warrant condonation for the late filing of this affidavit.

WHEREFORE the respondents persist in seeking an order dismissing the Premier's application and the City's application with costs, including the costs of three counsel.



DEPONENT



SIGNED AND SWORN TO BEFORE ME AT *Cape Town* ON THIS *19* DAY OF *November* 2025, THE DEPONENT HAVING ACKNOWLEDGED IN MY PRESENCE THAT SHE KNOWS AND UNDERSTANDS THE CONTENTS OF THIS AFFIDAVIT, THE PROVISIONS OF GOVERNMENT GAZETTE R1478 OF 11 JULY 1980 AS AMENDED BY GOVERNMENT GAZETTE R774 OF 20 APRIL 1982, CONCERNING THE TAKING OF THE OATH, HAVING BEEN COMPLIED WITH.

[Signature]
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J.W.S Smuts
COMMISSIONER OF OATHS

CAPACITY: *WO*
FULL NAMES: *James Wallace Sleigh Smuts*
PHYSICAL ADDRESS: *Goat Hope Builders*
Parliament.

SOUTH AFRICAN POLICE SERVICE
UNIT COMMANDER PARLIAMENT
PROTECTION AND SECURITY SERVICES
WESTERN CAPE
2025 -11- 19
PRIVATE BAG X1 STALPLEIN 8015
CAPE TOWN
SOUTH AFRICAN POLICE SERVICE

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