

**AD HOC COMMITTEE ESTABLISHED BY THE NORTH WEST PROVINCIAL LEGISLATURE TO
INQUIRE INTO THE AUTHENTICITY OF THE ALLEGATIONS MADE BY THE MAYOR OF
NALEDI LOCAL MUNICIPALITY: WITNESS BUNDLE No.2: "WB2"**

INDEX: MR THABO SEJAKE'S AFFIDAVIT

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TO: AD HOC COMMITTEE ESTABLISHED BY THE NORTH-WEST PROVINCIAL
LEGISLATURE TO ENQUIRE INTO THE AUTHENTICITY OF THE
ALLEGATIONS MADE BY THE MAYOR OF NALEDI LOCAL MUNICIPALITY

STATEMENT UNDER OATH.

I, the undersigned

THABO SEJAKE

Hereby state as follows under oath:

1. I am an adult person, with full legal capacity. I am employed by the Naledi Local Municipality, at its address of administration, 19A Market Street, Vryburg, in the Dr Ruth Segomotsi Mompati District, North-West Province. The facts narrated and deposed hereunder are within my personal knowledge, and are, to the best of my belief both true and correct.
2. I have been approached and invited by Tlou Attorneys Inc, acting on behalf of the North-West Provincial Legislature as Evidence Leaders, in the Ad-hoc Committee established to enquire into the authenticity of the allegations made by the Mayor of Naledi Local Municipality, to depose to an affidavit attesting to my knowledge (if any) of the matters arising for investigation.
3. I have not been compelled to depose to this affidavit, and I have not been induced in any manner to provide an account I set out below. I make this affidavit freely and voluntarily, guided only by my conscience and the truth.

The contents of this affidavit.

4. Mr Lazarus Mokgosi invited me to accompany him to a meeting he was scheduled to attend with Mr Thabo Appolus, on Sunday 02 April 2023, at Ganyesa in the Dr Ruth Segomotsi Mompati District. I obliged the request, and I accordingly accompanied Mr Mokgosi to the meeting. I sat-in the meeting and heard the discussions over the subject matter of the meeting.
5. I narrate hereunder, the foregoing two (2) issues:
 - (i) the basis for the invitation to attend the meeting, and
 - (ii) the content of the discussions in my presence.

INVITATION TO ATTEND THE MEETING.

6. Early morning, on Sunday 02 April 2023, I received a telephone call from Mr Mokgosi, a friend and colleague in the ANC. He advised me that he had organizational business to attend in the Dr Ruth Segomotsi Mompati District regarding the administration of the affairs of the Naledi Local Municipality.
7. At the time of the telephonic discussion, Mr Mokgosi was the Deputy Chairperson of the ANC in the North-West Province (Provincial Executive) and he was also the Chairperson of the Deployment Committee. I was a member of the Executive Committee for Dr Ruth Segomotsi Mompati Region.
8. I derived and deduced from the discussion that Mr Mokgosi was intending to visit in the Dr Ruth Segomotsi Mompati District, in an official capacity as

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member of the Provincial Executive Committee, to attend to activities of the Deployment Committee, insofar as they related to Naledi Local Municipality.

9. As a result, given that I was a member of the Dr Ruth Segomotsi Mompati District Regional Executive Committee, I did not consider the request to be unusual. My impressions were affirmed when Mr Mokgosi arrived at my residence together with Ms Doreen Mariri, and Mr Aobakwe Mathontshi, who were at the time also a members of the Regional Executive Committee, residing at Vryburg.
10. We [Ms Mariri, Mr Aobakwe Mathontshi, Mr Mokgosi and I] drove together, in a vehicle driven by Mr Mokgosi, to Mr Appolus's residence. The trip was relatively short, and nothing was discussed in the vehicle about the scheduled meeting with Mr Appolus. We arrived at Mr Appolus's residence, and we were warmly received. We exchanged pleasantries and ushered inside the principal dwelling at the residence, and the meeting ensued.

THE DISCUSSIONS AT THE MEETING.

11. As the discussions unfolded, and as I listened to the conversation between Mr Mokgosi and Mr Appolus, the primary focus of the meeting related to the appointment of Mr Modisenyane Segapo as the Municipal Manager for the Naledi Local Municipality.
12. The tenor of the meeting commenced on the tone that Mr Mokgosi was unhappy with the appointment of Mr Modisenyane Segapo as the Municipal Manager for the Naledi Local Municipality.

13. Mr Mokgosi, as he put it, was unhappy with the appointment because the Naledi Local Municipality had went against the political directive of the ANC Deployment Committee in appointing Mr Segapo.
14. Ms Mariri, Mr Aobakwe Mathontshi, and I, sat quietly throughout the discussions, and made no contributions to the discussion.
15. A brief account of the discussions appears below:
 - 15.1 When the discussions between Mr Mokgosi and Mr Appolus commenced, Mr Mokgosi produced a draft report from the North-West Provincial Department of Co-operative Governance, Human Settlements and Traditional Affairs (CoGHSTA).
 - 15.2 Mr Mokgosi informed Mr Appolus that he was worried that the draft report of CoGHSTA was approving the appointment of Mr Segapo as the municipal manager, despite that (according to Mr Mokgosi) Mr Segapo did not possess minimum qualifications.
 - 15.3 The initial focus of the discussion was around the status of the B Juris (Baccalaureus Iuris) degree and that of Vista University. Mr Mokgosi probed whether the degree was recognised as a qualification by the South African National Qualifications Framework.
 - 15.4 He also questioned whether the University which awarded the degree was considered as a credible university. Mr Appolus immediately raised the same questions telephonically with an unknown person, who confirmed that both the degree and university were credible, and approved by South African Qualifications Authority.

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- 15.5 Mr Mokgosi then suggested to Mr Appolus to try find anything that could obstruct the appointment of Mr Segapo, which would also assist Mr Appolus in his pending review application in the North West High Court. Mr Appolus assured Mr Mokgosi that he will do so.
16. I stepped outside, and a short-while later everyone came outside, indicating that the meeting had concluded. I never heard anything of the progress of the undertakings between Mr Mokgosi and Mr Appolus, nor did I hear from either of the parties until April 2025.

The publications by Mr Appolus.


17. On 02 April 2025, Mr Appolus published text messages between him and Mr Mokgosi. In those published texts, Mr Appolus made it known that (i) there occurred a meeting, on 02 April 2023 and (ii) provided a further account as to events post the meeting.
18. I have no knowledge of the events which Mr Appolus narrates as having occurred after the meeting of 02 April 2023, as neither he (Mr Appolus) nor Mr Mokgosi ever reported or advised me of the progress of their undertakings.
19. Second, after Mr Groep came to know of the publications of Mr Appolus, he approached me and asked if at all I was aware of the publications. I confirmed to him that I was aware of the publications, and further confirmed to him that the content of the publications was correct to the extent that I was aware of the events of the meeting of 02 April 2023.
20. I subsequently deposed to an affidavit setting out the same facts. A copy of the affidavit is attached hereto and marked Annexure A.

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CONCLUSION.

21. I have been provided with the transcript which sets out the assertions of the Mayor of Naledi Local Municipality, regarding the challenges to the appointment of Mr Segapo, investigated by the Ad hoc Committee of the North-West Provincial Legislature.
22. I have carefully considered the assertions of the Mayor, together with the statements and/or publications of Mr Appolus. I confirm that the assertions of the Mayor are true, and I also confirm that the assertions of Mr Appolus regarding the discussions at the meeting are correct, to the extent that they accord with the contents of this affidavit.



DEPONENT

I hereby certify that the deponent declares that the deponent knows and understands the contents of this affidavit and that it is to the best of the deponent's knowledge both true and correct. This affidavit was signed and sworn to before me at Sandton SAPSA on this 13 day of **November 2025** and that the Regulations contained in Government Notice R1258 of 21 July 1972, as amended, have been complied with.



COMMISSIONER OF OATHS

FULL NAMES: Lusanela Masendo

CAPACITY: Constable

AREA: Sandton SAPS
or Sandton City
Morningside

SOUTH AFRICAN POLICE SERVICE
CLIENT SERVICE CENTRE SANDTON
2025 -11- 13
KLIENTE DIENSSENTRUM SANDTON
GUID-APRIKAANSE POLISIEDIENS

AFFIDAVIT

I, the undersigned,

THABO SEJAKE

do hereby make oath and state that:

1. I am an adult male assistant manager in the occupational health and safety department of the Naledi Local Municipality ("the municipality"), at 19A Market Street, Vryburg in the Dr Ruth Segomoti Mompoti District, North West Province.
2. The facts contained in this affidavit are within my personal knowledge unless it appears otherwise from the context herein, and are to the best of my belief, both true and correct.
3. I have personal knowledge of the facts of the matter by virtue of the events that I depose below in this affidavit.

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4. I have conveyed the facts stated in this affidavit below to Mr Groep and Mr Segapo on 3 September 2025.
5. The respondents in the present pending appeal in the Supreme Court of Appeal, under case number 122/2024 approached the Mahikeng High Court to seek the review and setting aside of the fifth appellant's appointment as the municipal manager of the municipality. The matter was struck off from the roll with costs on 17 March 2023.
6. After the matter had been struck off from the roll with costs (as against the respondents), I received a telephone call from the then Chief Whip of the African National Congress ("ANC") in the North West Province, Mr Lazy Mokgosi ("Mr Mokgosi"). Mr Mokgosi was, at the time, the head of the deployment committee of the ANC in the North West Province.
7. Mr Mokgosi subsequently became the Premier of the North West Province, and he still remains as such and also the head of the deployment committee of the ANC of the North West Province.
8. Mr Mokgosi asked me to accompany him to see Mr Thabo Appolus regarding the pending High Court matter involving the appellants and respondents in the Mahikeng High Court.

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9. Mr Mokgosi was a close friend of mine, and we worked together in the political affairs of the ANC within the province. He came to fetch me at my place of residence at no. 155 Mackenzi Street, Vryburg on Sunday, 2 April 2023.
10. Mr Mokgosi was accompanied by one Doreen Mariri and a certain Aobakwe Mathontshi. We all proceeded to visit Mr Thabo Appolus at his place of residence in Ganyesa, North West. We were driven by Mr Mokgosi, in his car.
11. The Mr Appolus welcomed us at his home and a meeting then commenced. Mr Mokgosi was in possession of Mr Segapo's Curriculum Vitae, a check list for the recruitment process of the municipal manager at the municipality, the fifth appellant's academic records and qualifications and all other supporting documents that formed part of Mr Segapo's application for the post of the municipal manager.
12. Mr Mokgosi was not in possession of the application documents of other applicants to the post of the municipal manager. At the time, the concern by Mr Mokgosi was not whether Segapo had submitted all the documents, since he had.
13. Mr Mokgosi was unhappy with the appointment of Mr Segapo as the municipal manager. His reasoning was that the municipal council of the municipality had defied the ANC's political directive that Mr Segapo should not have been appointed as the municipal manager, as aforesaid.

14. The purpose of the meeting was, therefore, to seek Mr Appolus's assistance to derail the appointment of Mr Segapo as the municipal manager. At the time, Mr Appolus was the municipality's Director: Corporate Services, and all human resource and recruitment functions fell under him (the first respondent).
15. Mr Mokgosi sought to discredit Mr Segapo's appointment, as aforesaid, notwithstanding the existence of an internal legal opinion that the Department of Co-operative Governance Human Settlements and Traditional Affairs ("CoGHSTA") had prepared and advised that there was no procedural or substantive irregularities in the manner Mr Segapo had been appointed as the municipal manager.
16. Mr Mokgosi then asked Mr Appolus to try and find anything that could assist him (Mr Mokgosi) to ensure that the appointment of Mr Segapo is reviewed and set aside. Mr Appolus then agreed.
17. During the said meeting, Mr Appolus and Mr Mokgosi went through the check list for the appointment of a municipal manager.
18. Mr Mokgosi further stated that the MEC's report would then be used as the basis and/or opinion as to why the appointment of Mr Segapo should be reviewed and set aside. Shortly before the meeting ended, I left the room and waited outside and few minutes later Mr Mokgosi, Doreen Mariri and Aobakwe

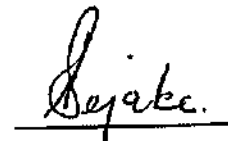
Mathontshl joined me, and we left Ganyesa for Vryburg.

19. I must also record that Mr Mokgosi was in constant telephonic communication with a legal representative who advised Mr Mokgosi on how the urgent application that had been struck off from the roll on 17 March 2023 would be reinstated and re-argued on the basis that the MEC would not have concurred on the appointment of Mr Segapo as the municipal manager.

CONCLUSION

20. The reason why I am volunteering this information late in the day is because as early as April 2025, Mr Appolus had sent to me, via WhatsApp, a screenshot WhatsApp communication between Mr Appolus and Mr Mokgosi in which the first respondent, *inter alia*, recorded that the purported MEC's report was not authored by the MEC for CoGHSTA Nono Maloyi but had been prepared in the circumstances that I have explained above.
21. I annex a copy of Mr Appolus's WhatsApp screenshot communication between him and Mr Mokgosi annexed hereto as "TS1".
22. It is clear to me that Mr Mokgosi has used Mr Appolus to achieve his political goal of discrediting Mr Segapo. Mr Appolus apologised to me for having included my name in the said annexure ("TS1") on social media and informing the whole world of the meeting of 2 April 2023 as aforesaid.

23. I have been following the Court proceedings involving the parties and my conscience does not allow me to hide the true facts and for the Courts to make decisions that are based on incorrect facts.
24. In addition, I witnessed Mr Groep's recent address, on national television that was aired on Wednesday, 3 September 2025, in which he explained to the National Portfolio Committee on Co-operative Governance and Traditional Affairs that there is evidence that has recently surfaced which points to the tampering of the MEC's report that was submitted in Court as the basis of reviewing and setting aside Mr Segapo's appointment as municipal manager of the municipality.



THABO SEJAKE

I certify that this Affidavit was signed and sworn to before me at 72 Vuy street on this the 10 day of **SEPTEMBER 2025**, by the Deponent after he declared that he knew and understood the contents of this declaration, that he had no objection to taking the prescribed oath and has taken the prescribed oath which he considered binding on his conscience, having complied with the regulations contained in Government Notice R1258 of 21 July 1972, as amended.

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COMMISSIONER OF OATHS

Full names:

Haroon Gqwe

Capacity:

Syb

Designation:

72 Vryburg street.

Address:

TIRELO YA MAPODISI A AFRIKA BORWA	
2025 -09- 10	
VRYBURG	
SUID AFRIKAANSE POLISIEDIENS SOUTH AFRICAN POLICE SERVICE	

Handwritten: 7176150-1, 564, Gqwe

Handwritten: Sandton, 2025-10-13, 23 25

(HANDTEKENING) KOMMISSARIS VAN EDE
(SIGNATURE) COMMISSIONER OF OATHS

Handwritten: Lusanda R. Masambo

VOLLE VOORNAAM EN VAN IN DRUKSKRIJF
FULL FIRST NAMES AND SURNAME IN BLOCK LETTERS

Handwritten: 02 Sunnithroad

BERIGHEIDSAFRES (STRAATAFRES)
BUSINESS ADDRESS (STREET ADDRESS)

Handwritten: Morningside

Handwritten: 02

SA POLISIEDIENS
SOUTH AFRICAN POLICE SERVICE

SOUTH AFRICAN POLICE SERVICE	
CLIENT SERVICE CENTRE SANDTON	
2025 -11- 13	
KLIENTE DIENSSENTRUM SANDTON	
SUID-AFRIKAANSE POLISIEDIENS	

