AD HOC COMMITTEE ESTABLISHED BY THE NORTH WEST PROVINCIAL LEGISLATURE TO INQUIRE INTO THE ALLEGATIONS MADE BY THE MAYOR OF NALEDI LOCAL MUNICIPALITY

INDEX: MR OABAKWE MATHONTSHI'S AFFIDAVIT

WITNESS BUNDLE No.: "WB6"

TLOU
Attorneys & Associates

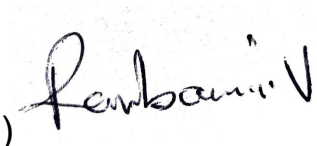
AD HOC COMMITTEE -NORTH WEST PROVINCE

FILING NOTICE

BE PLEASED TO TAKE notice that MR AOBAKWE MATHONTSHI AND DOREEN MARIRI present the following documents for filling:

1. AFFIDAVIT OF MR AOBAKWE MATHONTSHI : PAGE 1-10
2. CONFIRMATORY AFFIDAVIT OF MS DOREEN MARIRI : PAGE 1-2

SIGNED AND DATED AT PRETORIA ON THIS 21 DAY OF NOVEMBER 2025.



(SGN)

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AFFIDAVIT OF
MR OABAKWE MATHONTSHI

I the undersigned:

MR AOBAKWE MOTHONTSI

do swear under oath and state that:

1.1. I am an adult male Special Advisor to the Executive Mayor of Dr Ruth Segomotsi Mompati District Municipality. My chosen address for purposes of service is that of my attorneys of record.

1.2. Unless explicitly stated to the contrary, the contents of this affidavit fall within my own personal knowledge and are to the best of my knowledge both true and correct.

1.3. I received a call from the evidence leader requesting me to depose to an affidavit for purposes of the investigation being conducted by the ad hoc committee.

2. **The allegations made by Mr Groep and Mr Sejake pertaining to our visit to Mr Thabo Appolus' place in april 2023.**

2.1. I was gobsmacked when I heard the Mayor's allegations at the Portfolio Committee. I am therefore enjoined to explain briefly our visit to Mr Thabo Appolus's place on the 2nd of April 2023.

2.2. On or about the 10th of March 2023, the Council of Naledi Local Municipality unlawfully appointed Mr Segapo as its accounting officer. The irregularities committed during the recruitment process and the Mayor's close affiliation to Mr Segapo which he never disclosed was public knowledge.

2.3. When Thabo Appolus, Vuyiswa Morakile, Lorato Sethlake and Lebogang Jacobs lodged an urgent application challenging the appointment of Mr Segapo. The Applicant received a loud acclamation from almost all ANC formations in the Northwest in general and DR RSM in particular.

2.4. There is no ANC cde or member who supported this appointment without them being politically biased due to politics of the stomach. It is for this reason that when the urgent application was heard on the 24th of March 2023, a lot of people (ANC and non ANC members) attended court in support of the Applicants. I was one of the people who attended court on this day. Unfortunately the matter was deemed premature and struck off from the roll.

2.5. We all awaited for the MEC to make a decision in terms of the Act before the matter could be re – enrolled. This was a matter of public interest and hence we were making regular follow ups with the Applicants on the progress of the matter.

2.6. Even though the matter was of public interest, Mr Sejake was more interested than all of us. To my knowledge, the reasons for his interest in the matter were as follows: -

2.6.1. He was a sworn enemy of Mr Segapo whose leadership he described as being *gang star.*

2.6.2. He was on the brink of being suspended and he was certain that his dismissal was also looming as he had been served with a notice of intention to suspend him.

2.6.3. He had a close proximity to Mr Appolus as they were both being victimised by Mr Segapo and by virtue of his wife having been the personal assistant of Mr Appolus.

2.7. Mr Sejake was thus determined to have Mr Segapo removed from office hence he was supportive of the application. It is known by a lot of Cdes that most of the documents used in the application emanated from Mr Sejake. Mr Thabo Appolus must either deny or confirm this allegation.

3. On or about the 1st of April 2023, Mr Sejake called me and Ms Doreen Mariri requesting us to accompany him to go and see Thabo Appolus at his place of residence in Vryburg. We suggested that we be accompanied by our senior Mr Mokgosi who was the Chief Whip of the Provincial Legislature then.

4. Mr Mokgosi agreed to accompany us and we drove together to Mr Appolus' place on the 2nd of April 2023. In paragraph 10 of his affidavit, Mr Sejake correctly stated

that nothing much was said on the way as the journey was relatively short. It was rather Mr Sejake who did most of the talk expressing his hatred for Mr Segapo and how he feared losing his job. He boasted having "a bomb" which would destroy Mr Segapo.

5. Noone of us knew of this bomb but however, knowing that he had been supplying Mr Appolus with documents, I personally believed that he was capable of proving the irregularities in the appointment of Mr Segapo. At this point I must applaud him for the job well done. The Applicants could never have made it without the support of Mr Sejake.

6. When we arrived, we were well received as alleged in paragraph 10 of Mr Sejake's affidavit. However, Mr Sejake stated in paragraph 11 that discussions unfolded and he listened to the conversation between Mr Mokgosi and Mr Appolus which related to the appointment of Mr Segapo. Whereas the purpose of the visit was the unlawful appointment of Mr Segapo, it is not true that Mr Sejake sat as mainly a spectator listening to the conversation between Hon Mokgosi and Mr Appolus. This was his visit; we had accompanied him. He did most of the talking himself and I must say he loves the sound of his voice.

7. It was clear to us that Mr Appolus and Mr Sejake had met several times before by the nature of their conversation. There was nothing unusual about this as we all knew that Mr Sejake was a secret hand and voice behind the application to have the Appointment of Mr Segapo set aside. Even though Mr Sjake's motive of helping Mr Appolus was somehow motivated by personal vendetta against Mr Segapo, it does not take away the fact that the appointment was indeed marred with irregularities which have been confirmed by the courts.

8. Mr Sejake reached into his envelope and unleashed what perhaps was the proverbial *bomb* he claimed to possess. He was in possession of a letter he claimed had come from anonymous. Attached to this letter was a B Uris certificate and an academic record which allegedly belongs to Mr Segapo. We are not in possession of this letter and its accompanying documents. Either Mr Sejake of Mr Segapo must be able to provide the Committee with these documents.

9. From my memory, the academic record had only 14 modules and Mr Sejake remarked that: -

   a) these modules were mainly First and Second year modules.

   b) There was only 1 module which appeared to be a Third Year module.

   c) It was impossible for a degree to be completed with only 14 modules.

   d) The documents were seemingly fraudulent.

   e) Even if the degree was not a product of forgery, it is not an equivalent of LLB.

   f) The mayor had not sent Mr Segapo's tertiary qualification for verification as required by the Regulations.

10. We all agreed with his assessment as we still do to this present day. The adverse findings made against the mayor by the Supreme Court of Appeal in its judgment does not come to us as surprise. Instead of investigating this issue, the committee is constituted to investigate corridor gossip and the Mayor's speculatory remarks

which are clearly meant to put the Premier on the guillotine. Mr Groep must disclose the political players behind his allegations and the motive.

11. The real question was whether the qualifications in possession of Mr Sejake are the qualifications used by Mr Segapo when he applied for the position. Mr Sejake regretted that he had not been able to obtain a copy of the recruitment report before it was submitted to the MEC. He remarked further that the manner in which the report was being kept a secret may reveal a sinister agenda. This suspicion was confirmed by the contents of the letter allegedly received from a whistle blower which stated unequivocally that Mr Segapo had no qualifications which legitimately allowed him to be appointed as an accounting officer. I cannot remember the exact wording of the letter but it centred upon Mr Segapo's qualifications. There was never a CV of Mr Segapo in this meeting as alleged by Mr Sejake otherwise it would have formed part of the documents filed by the Applicants.

12. Hon Mokgosi never brought any documents to this meeting nor did he express a keen interest in the outcome of this matter. He also did not display any personal feelings on the matter nor did he hunger for an adverse finding against mr Segapo. Rather he commended Mr Appollus for grabbing the bull by the horns and encouraged him to fight against the rot in the Municipality. It is true that myself and Doreen were quiet in the meeting and said nothing as alleged in paragraph 11 of Mr Sejake's affidavit. The dialogue was mainly between Mr Sejake and Mr Appollus.

13. In paragraph 15.1, Mr Sejake alleged that Mr Mokgosi produced a draft report from Coghsta. This is not true and I challenge Mr Sejake to produce a copy of the alleged report. In his earlier affidavit per paragraph 11, Mr Sejake mentioned that Mr Mokgosi was in possession of: -

    i. *Mr Segapo's CV*
    ii. *A check list for the recruitment process.*
    iii. *Mr Segapo's academic records and qualifications*
    iv. *supporting documents which Mr Segapo used in his application.*

14. In paragraph 15, he stated that Mr Mokgosi sought to discredit the appointment of Mr Segapo notwithstanding the existence of an **internal legal opinion** from coghsta which stated that there were no irregularities in the appointment of Mr Segapo.

15. It must be noted that in this affidavit he mentions an **internal legal opinion** and in the other he mentions a **draft report**. Lip service is paid to these documents without annexing the same. The premier brought nothing with him and was holding his car keys throughout the meeting. Mr Sejake must not be allowed to blow hot and cold in his two affidavits.

16. Mr Thabo Appollus stated that his lawyers had refused to make use of Mr Sejake's letter as it lacked credibility being evidence from the street. I have observed the following paragraphs from Mr Groep's affidavit which contradict the case Mr Sejake is trying to corroborate . In paragraph 10, he stated that;

"On the 2 May of May 2023 the MEC, PDM Maloyi addressed a letter to me dated the 11th of April 2023, *which was electronically transmitted to me, in response to the report that was served on his office under a covering letter dated 23 March 2023 which was duly signed by myself.* I attach the MEC's letter hereto marked Annexure "CG1".

16.1. There cannot be claims that the MECs report was forged when the Mayor positively states that he received the report from the MEC. This contradicts what is alleged by Mr Sejake in paragraph 20 of his first affidavit (stating that the Report of the premier was prepared at Mr Appolus' place.

16.2. Furthermore, the whole meeting discussed the qualifications of Mr Segapo and we were all convinces, as we still are, that he does not have the requisite qualifications. If Mr Mokgosi had the power to fodge/alter or temper with the report of the MEC, how then did he certify that Mr Segapo has the qualifications as stated in the MEC report which refused concurrence. This alone defies logic.

17. In paragraph 20 Mr Groep went on:

"On the 28th of May 2025 the *MEC Maloyi again addressed a letter to me expressing his "disappointment" regarding the content of my response to him. He further claimed that my letter "translates into a completely new report to the recruitment process of the municipal manager". He then requested reasons why a comprehensive report was not submitted from the onset as required.*"

18. Once again, he acknowledge discussing the contents of the report submitted to the coghsta with the MEC. He also claims that this report was tempered with and yet it features nowhere in Mr Sejake's affidavits.

19. We were present when the meeting happened, we did not witness any forgery as alleged by Mr Groep and Mr Segapo. There were no laptops, computers or printers in the room where the meeting occurred.

20. As far as I know, the suspension of Mr Sejake was lifted and there was never any disciplinary hearing. Mr Sejake must tell this committee the price he had to pay or he is still paying for the favours his received from Mr Segapo and Mr Groep.

21. I still do not understand the evidence which is before the committee which prove the allegations. Mr Groep and Mr Segapo must be accountable and take full responsibility for their actions without dragging names of innocent people through the mud.

22. There is no truth in both Mr Sejake and Mr Groep's affidavits filed before the commission. I hope this evidence shall be of assistance to the committee which in my view is another waste of tax payer's money caused by Mr Sejake and Mr Groep who are desperate to save Mr Segapo. I attach hereto a copy of Ms Mariri's confirmatory affidavit as annexure **"BB"**.

Deponent

Thus signed and sworn to before me at Mahikeng **on this the** 20 **day of NOVEMBER 2025**

The deponent having acknowledged that he: -

1. Knows and understands the contents of this affidavit;
2. Has no objection to taking the prescribed oath; and
3. Considers the prescribed oath binding on his conscience.

The administration of the prescribed oath having complied with the Regulations as prescribed in government gazette number R1258 of the 21st day of July 1972, as amended.

Commissioner of oaths

Full Names: LESLEY CAMEBOE

Full Address: 2098 MOSIALOA STREET

Designation: CONSTABLE

Area for which appointed:

TIRELO YA MAPOLISA A AFRIKA BORWA
2025 -11- 20
SUID AFRIKAANSE POLISIEDIENS
SOUTH AFRICAN POLICE SERVICE

CONFIRMATORY AFFIDAVIT OF
MS DOREEN MARIRI

I the undersigned:

DOREEN MARIRI

do swear under oath and state that:

1.1. I am an adult female Laison Officer at Dr Ruth Segomotsi Mompati District Municipality. My chosen address for purposes of service is that of my attorneys of record.

1.2. Unless explicitly stated to the contrary, the contents of this affidavit fall within my own personal knowledge and are to the best of my knowledge both true and correct.

2. I have read the affidavit deposed to by Mr Mathontsi I wish to confirm that the facts deposed to in his affidavit are a true account of the events whuch transpired when we visited Mr Thabo Appollus at his place of residence in Ganyesa.

3. I also fully align myself with the contentions pertaining to the allegations made by Mr Groep and Mr Sejake.

Deponent

Thus signed and sworn to before me at Huhudi **on this the** 20 **day of**
NOVEMBER 2025

The deponent having acknowledged that he: -

1. Knows and understands the contents of this affidavit;
2. Has no objection to taking the prescribed oath; and
3. Considers the prescribed oath binding on his conscience.

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Full Address: 2098 MOSIAPOA STR

Designation: CONSTABLE

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2025 -11- 20
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SOUTH AFRICAN POLICE SERVICE