



EXHIBIT T 27.1

AFFIDAVIT OF SANDY THOMAS



**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING ORGANS OF STATE**

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INDEX: EXHIBIT T 27.1

#	Pages	Pages
1.	Affidavit of Sandy Thomas	31.1 to 31.23
2.	Proof of Service	31

JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS OF STATE
CAPTURE, CORRUPTION AND FRAUD IN THE PUBLIC SECTOR INCLUDING
ORGANS OF STATE

TO: ACTING-SECRETARY OF THE COMMISSION

Ms BRIGITTE SHABALALA

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17 EMPIRE ROAD, PARKTOWN

JOHANNESBURG, 2193

DATE: 28 AUGUST 2020

AFFIDAVIT OF SANDRA THOMAS

I, the undersigned

SANDRA THOMAS

Hereby state as follows under oath:-

1. I am an adult person, with full legal capacity, residing in Johannesburg in the Gauteng Province. The facts herein are within my personal knowledge and to the best of my belief both true and correct.



2. I have been called upon to appear before the Commission to provide information at my disposal related to the work of the Commission. I provide the information at my disposal voluntarily and without any manner of coercion.
3. The information that I present below arises from the factual context of my interactions with officials of the Commission and the various other written correspondence directed to me.
4. Due to the times constraints, this affidavit will not contain a full detail of the information that is set-out. As such, and to the extent necessary, I may orally extent on portions of the information.

FACTUAL BACKGROUND

5. Long before I received the summons directing that I should appear before the Commission, I had interactions with the officials of the Commission responsible for investigations. I do not recall the precise date of the first encounter, but I believe it ought to have been around September 2019.
6. The overall substance of the conversations, which occurred overtime, since September 2019 until January 2020, was that certain people had come-forward with information implicating the Former Minister Mokonyane wrongdoing.

7. The name of Mr Agrizzi was mentioned, was specifically mentioned to me as one of the people that had come forward with some serious allegations against the Former Minister Mokonyane.
8. It was explained to me, that the purpose of interacting with me was to verify the correctness of the information already known to the investigators, which potentially fell into the ambit of my work, as the Personal Assistant of the Former Minister Mokonyane.
9. The discussions ensued from that premise over not less than five occasions. I distinctly recall two instances where the interactions were by physical presence and the other instances were telephonically.
10. As various questions were put to me to confirm or elaborate upon, I obliged and assisted the investigators to the best of my ability and recollection.
11. Each time, over the afore-stated period of the interactions with the investigation officials, I got the distinct impression that each time the answers that I provided seemed not to be what they would have wanted to hear, and the investigators seemed to become a bit agitated.
12. In one of such instances, the conversation took a drastic turn from the initial purpose of the engagement to a point where I was being questioned about my personal affairs. I was specifically astounded when I was questioned

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about my application for home loan finance and ultimately my bank accounts.

13. After mention was made of my personal finances, as aforesaid, the conversation then swiftly returned to the Former Minister Mokonyane as the subject of the discussion. I read the body language, (perhaps incorrectly) as such that I suggested that: *"I should give adverse information about the Former Minister or else I am going to become a subject of investigation..."*.
14. I was baffled and I decided to engage services of an Attorney. From that point, I directed that any future correspondence going forward should be through my legal representatives and I had felt very uncomfortable with the conduct of the investigators which I perceived as intimidatory.
15. On 11 February 2020, I, together with my legal representatives (Attorney and Counsel) attended a meeting with the legal team of the Commission. At the meeting, the leader of the Commission's legal team introduced himself and his team to me and my legal representatives.
16. One of the investigators, who I had engaged with previously as set-out above, was present. As I felt a little comfortable, I took the opportunity to raise my concerns with everyone sitting around the table.

17. The investigator apologized, and point-out that it was not his intention to intimidate nor threaten me, and that if had I perceived his conduct to have been intended to intimidate or threaten me, he apologised. I accepted his apology as genuine and well-intended.
18. The meeting proceeded. The leader of the legal team explained to me that the purpose of the meeting was to establish if at all there was any information, at my disposal, particularly related to events that I would have come to know during my work for the Former Minister Mokonyane, relevant to the work of the Commission, which I wished to share and assist the work of the Commission.
19. My legal representative briefly intervened, and proposed that the legal team of the Commission to ask any question they wished to put to me. The leader of the legal team of the Commission counter proposed that rather a list of questions will be prepared and that I should answer the questions at my leisure.
20. The proposal was accepted and the meeting adjourned. A few days later, the legal team of the Commission directed a list of questions. Surprisingly, the questions were focused towards me, as an individual, and not to the activities surrounding the Former Minister Mokonyane, as had been indicated.

21. My legal representatives responded to the letter and enquired as to why have I become the subject of an investigation, and specifically sought to understand if there had been a person who had implicated me in wrongdoing.
22. For my part, that was the last I had heard anything about the matter, until on 14 August 2020, when I received summons directing that I should appear before the Commission, on 25 August 2020, for reasons set-out in the summons.
23. Whilst anticipating the date of my appearance to the Commission, as aforesaid, on the 19 August 2020 is received a notice in terms of Rule 3 of the Rules of the Commission. I was advised that Ms Gina Pieters would give evidence to the Commission on 1 September 2020, implicating me in wrongdoing.
24. I was referred to specific portions of the affidavit and directed to react thereto, by no later 14 days, from the date of receipt. My legal representative advised that the notice implied that I was deliver my response to the aforesaid affidavit if I so wished by 02 September 2020, noting that Ms Pieters would be testifying on 01 September 2020
25. Upon having considered the allegations raised in Ms Pieters affidavit, my legal representatives advised me that it would be most convenient that we

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deal with the questions raised in the annexure to the summons and Ms Pieters affidavit at the same time. I agreed with the suggestion, and we resolved to communicate the proposal to the legal team of the Commission.

26. To this extent, my legal representatives contacted the lead evidence leader to consider having me excused from attending the proceedings, as I was scheduled for 25 August 2020, so as to enable me deal with all the allegations in one affidavit.
27. I was advised by my attorneys of record that the Evidence Leader directed that a letter should be addressed to the Commission stating the basis for such request and such letter should be transmitted before close of business on Friday, 21 August 2020.
28. My legal representatives addressed a letter to the Commission, as per the directions of the Evidence Leader. I was advised that we should wait for the response of the Commission on whether I should be attending or not by Monday, 24 August 2020.
29. No response was received from the Commission and I understood that to mean that the Commission was amenable to our request.
30. However, on 25 August 2020 I received phone calls from family and friends advising me about allegations on the media that I had failed to appear at the

Commission. I immediately called my attorneys who advised me to come to the Commission.

31. I stopped working immediately and presented myself without any further delays. I apologise for the misunderstanding and the inconvenience that I have occasioned. I honestly believed that there had been some understanding between the legal representatives.

32. I proceed to answer the individual affidavits below.

AFFIDAVIT MR AGRIZZI

Ad paragraph 22.1

33. I was generally aware about an entity called Dyambu but have no specific detail about the nature of business interests held by Mrs. Mokonyane.

Ad paragraph 22.2

34. Save to admit that Mokonyane was an MEC for Safety and Security during 2002/2003, I bear no knowledge of the balance of the allegations herein.

Ad paragraph 22.3 to 22.5

35. According to my recollection, the Mokonyanes were always away on holiday during Christmas, the items mentioned in paragraph 22.3 could not be for their family Christmas needs. The only items I am aware of groceries that were brought for distribution to the needy. The items mentioned in paragraph 22.3 are consistent with what she would distribute to the needy.

36. Save to state that I only had a telephonic discussion with Mr Agrizzi when I was in hospital during 2014 when he wanted to enquire about something work related and I referred him to my colleague.

37. I specifically deny that he called me regarding matters listed in subparagraphs 22.5.1 to 22.5.5. Upon learning that I was at hospital Mr Agrizzi seemingly arranged through his secretary who called me subsequently to arrange for delivery of flowers.

Ad paragraph 22.6 to 22.13

38. I bear no knowledge to the allegations raised in these paragraphs.

Ad SMS message of 01 June 2017

39. I contacted Richard at the request of the Late Mr Serge Mokonyane.

The article title -THE MINISTER, THE GIFTS, THE WATSONS AND THE WIND FARM

40. Save to admit that I had called Richard Le Roux, I bear no knowledge of the allegations contained in this article.

AFFIDAVIT OF RICHARD LE ROUX

41. I admit that I called Mr Le Roux relating to maintenance issues at the request of Mr Mokonyane. I should mention that Ms Mokonyane was hardly at her primary residence as she was allocated ministerial residences in Cape Town and Pretoria during her tenure as the Minister and was in Cape Town for a large part of the year.

42. During her tenure as the Premier as she was residing at the Premier's house in Bryanston.

43. I always discussed maintenance issues about the house in Krugersdorp with her late husband who resided permanently at the house.

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The remainder of the inquiries

44. On day, sometime in 2002/3, the previous Personal Assistant of the Former Minister Mokonyane did not arrive at work. I was literally told: *"go sit in that chair and do what has to be done"*.

45. I was an Administrative Secretary, responsible for other duties at the time. I went to sit in that chair with the understanding that I was being given an opportunity to display my abilities. I appreciated the opportunity, and in a brief conversation that I had with myself, I understood that I would have to learn quickly

46. In the weeks and months that followed, I challenged myself to better each day and make myself indispensable, and I believe I have made good the promise I undertook to myself. Today, as I depose to this affidavit, I am able to humbly say, I am a brilliant PA, and say so without hesitation.

47. The starting point of it all is this:

47.1 When the Principal comes to you as PA, and says I need this or that to be done, the best answer that must follow immediately thereafter is that it has been done. A request that is repeated more than twice, should ordinarily be anticipated.

- 47.2 The next stage of the discipline of being an indispensable PA is that you must be able to deliver upon requests in the spur of a moment. For this to happen, you need to build and maintain relationships.
- 47.3 The above two narrations briefly sums-up the role and responsibility of an indispensable PA.
- 47.4 I have summed-up the foregoing to bring context to the answers that I give broadly below.
48. When I started working for the Former Minister Mokonyane, our relationship was purely that of people working together and each one doing her job. Over time, I seamlessly integrated into the entire family life. I provided support to her late husband and children, working with Female Ministers is very different, your role as a PA extends beyond the boundaries of the office.
49. The gradual integration, as I mention above, occurred mainly (as I assume) because the Former Minister Mokonyane would ask members of her family to call me directly and ask me for something to be attended to. It is in those conversations that I came to know the names of the family members.
50. Upon being appointed Premier, and thereafter Minister, the Former Minister Mokonyane spent more time away from her family residence than when she was Member of Executive Council of Gauteng Provincial Government.

51. Her appointment as Premier drastically changed she schedule. It was during that the time, when she earned the nickname *Mama Action*. Unlike before, when she was MEC, she became more and more unavailable on her cellular phone.
52. The members of her family would call her, sometimes for urgent reasons, only to find that her phone was switched-off. There grew a trend within the family of telephoning me whenever they could not reach her.
53. I would then, depending on why she was needed, make arrangements for her to return the call as soon as it became possible. I was able to do that because I would always be in touch with the security detail. So as and when the need arose, I would simply call someone that I knew you be a meter away from her, and ask the person to relay whatever massage I needed to get through to her.
54. In almost every urgent instance, she would return the call to the particular family member, and as I followed-up with the particular family member, I would be told, thank you she has come back to me.
55. I slowly became the go to person, and as time went by, the members of the family would then call me first and ask that I should get her to call them. It was during this time that I started interacting with her late husband frequently.

56. Our conversations would ordinarily start-off with: *I am looking for the Your Boss or Nomvula, and I can't get hold of her, please get her to call me, and whilst at that please check-up with the children's school and arrange some or the other.*
57. After having attended to the school matters or whatever was needed to be done at the time, and upon report back "*good news, always*", then something else will crop-up. The comment will be something like, "*oh thank you, that was quick, can you please assist with me whatever else*", to which I would respond "*with pleasure Mr Mokonyane no problem, let me get on it*".
58. As aforesaid, I then was gradually integrated into the family fold.
59. The foregoing illustration refers to one side of the job, which for present purposes I wish to characterise as taking instructions from the Principal. The next component of the job involves making things happen.
60. In this regard, with reference to the foregoing example of attending to school matters, I would then pick-up the phone and call the school. A person would answer the phone and say "*Good Morning, this Moon School, you are speaking to Linda, how can I help?*".
61. As I always had a pen and a note-book with me, I would immediately address the person as Linda, and start the conversation. During such

conversations especially if it was after hours, I would then keep my ears wide open to listen to the person's background.

62. If a child were screaming or talking in the background, I would immediately ask who it was, and if he or she needed attention i wouldn't mind calling back. When the speaker on the other-end responds and gives a name and tells what is happening, I would immediately make a note of the name and the relationship.
63. If I ever have to call the person again some other time, I would start the conversation with referring to the person by name and ask how is your child or grandchild who I would mention by name. A conversation that starts in that way will in all probabilities get you the result you desire from the main reason of the telephone call.
64. The foregoing approach has worked for me across the board. Whether a school, clinic, saloon or restaurant. The strategy has worked wonders, and I would always return to the Principal with a better result.
65. Whilst the starting point comprises of tactics to a job done, we ultimately end-up forming real and genuine relationships, with people that we never physically see or ever meet. In some instances, if luck prevails, we would get to physically meet by random occurrence and finally put a name to a face.

66. I mention the foregoing to illustrate that there are people that I have never physically met, with whom I have great relationships. This has become the norm and there are many of these situations it could be hundreds of these over the years
67. Another important aspect of the relationship side of thing's, is that you should be able to make a connection with people you know in that way, as indicated above, with other people they know, who are around you, or who are in the same circle of PA's.
68. An example in this regard is that one Minister would invite another Minister for a meeting or lunch or breakfast at a particular hotel or restaurant. Later that day I would make it my business to ask how was the particular place, so as to determine whether she liked the place and would want to go to the place some other time.
69. The minute I get an indication that she liked the place, I will call the PA of the other Minister who arranged the meeting, and ask for the details of the of that particular place and if there is a contact person.
70. I would then call the contact person at the place and mention to the person that I received your details from *Anna*, because my Principal appreciated your hospitality, so you should expect my call soon to make a booking.

71. If it ever happens that I should call the place for a reservation, I would call the contact person referred to me, and in the exchange of the greeting pleasantries I would strike up a conversation with the person, we would talk about something such as his/her child going to matric dance or birthday or something of relevance also about the contact person's own life very briefly.
72. In that way the relationship is then sealed, and in the form of a network. The next time you need to make an urgent booking, you are guaranteed success. In this way you return to the Principal with good news.
73. Then, there would be people that would want to endear themselves to your Principal. A basic port of call for those people is always the Principal's PA.
74. Such people would for example call you and say: *Kaizer Chiefs and Orlando Pirates are playing this Saturday at FNB stadium. I have tickets, do you think your Principal would like to go?*
75. I would immediately know that FNB stadium is in Gauteng, and the Principal would be in Kwa-Zulu Natal or Limpopo or Cape Town, and therefore she cannot attend even if she had wanted to attend.
76. Some people would say okay goodbye, however the others would say would you like to attend?. Even if I do not accept the invitation to attend for whichever reasons, I would always remember the gesture and I mostly

always endeavour to assist the person the next time with a request for an urgent appointment or some or other thing in the scope of our work.

77. In this abovementioned group of persons, you would always get the sense that there is an element of initiative. An example in this regard, is with reference to birthdays. I would get a telephone call in which the person would ask me: *"what colour flowers does your Principal like or prefer? Do you have a florist that you could perhaps recommend?"*.
78. Now in such case, the person that calls is Mr Watson, for example, who I personally know to be a close friend of the family. When you properly listen to his words, you would understand that he is not asking if he should get flowers, he is clearly communicating that he is getting flowers for my Principal, and all he needs to know from me is the colour of such flowers.
79. Understanding the context of birthday gifts and the element of surprise usually attached thereto, I cannot say to Mr Watson ask her yourself.
80. The man is not a stranger to the family, and he is polite. My automatic reaction is to be of assistance as far as possible.
81. Whilst on this note, I wish to mention an added benefit or advantage that naturally came with working with Former Minister Mokonyane, it is that our birthdays are one day part. Mine comes first, and hers follows two days later.

As such, when people start thinking about what to get for her birthday, and then call me, to know of her preferences, they would usually call a day or so before my birthday and some would call on my birthday.

82. Mr Watson had somehow been aware of my birthday, and he would always call me and wish me a happy birthday.

83. As I became often involved in assisting Mr Mokonyane with his affairs, which at times included liaising Mr Watson on his behalf, Mr Watson then developed a habit of sending me a card or flowers, or a hamper, for my birthdays.

84. Whilst I never solicited his gifts, I warmly received them because I never thought there anything wrong with his intentions. In my mind he was just being kind, as I had known him to be a kind person.

85. One occasion, possibly on the dates mentioned in the affidavit of Ms Gina Pieters, Mr Watson called to make inquiries about the preferences of Former Minister Mokonyane. I remember he telephoned me a day after my birthday and a day before Former Minister Mokonyane's birthday.

86. During the conversation, he independently remembered that my birthday had been a day before, he brought it up with me and apologised for having forgotten about it. I assured him, that I understood that he was a busy man,

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and I even joked about forgetting birthdays of people close to me just to calm him down.

87. As I understood the progression of our conversation from that point going forward, the subject was water under the bridge, and I continued with my work.

88. Surprisingly, I birthday card and a hamper as described in the affidavit of Ms Gina Pieters, was sent. I appreciated the gesture very much, and I thanked Mr Watson.

89. I want to emphasize, nonetheless, that I had in no way reacted angrily towards Mr Watson as suggested in the affidavit of Ms Gina Pieters. To put matters in clear terms, Mr Watson was not my friend, nor a peer to whom I could talk as alleged.

90. Whilst, I have encountered him to be a humbly person, I have always understood that he was not my contemporary and there is no way I would have spoken to him in a raised voice or made demands upon him.

91. Another aspect that warrants specific mention pertains to the large scale groceries, arrangements for the mentioned birthdays and burials of the deceased loved ones of the Mokonyane family.

91.1 The large scale groceries could not have been for the family consumption. I believe this aspect was cleared by the Former Minister herself. My knowledge of the arrangements in the house, objectively conveys the message that the type of large scale groceries could not have been accommodated in the house.

91.2 However, I distinctly remember that there were instances when I corresponded with people, including Mr Agrizzi, relating to such large scale the type of groceries as mentioned, for the community projects for the elderly in Kagiso.

91.3 Even then, Mr Watson would always be the person that initiating the entire process. He would telephone me and intimidatingly, and yet joyfully say: *"now we stop everything and focus on the people of that really need a bright festive season."*

91.4 I would immediately know who to contact and establish the anticipated number of people and the needs. I would also make sure the relevant dates are noted in the calendar.

91.5 Whilst the event planning usually occurred in the early weeks of December, just when I felt my body need to rest, the work around it had a way of revitalizing my energy and I would beam with smiles' as I operated a full throttle, thinking of how happy the grannies and

granddads would be.

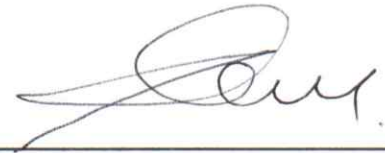
91.6 I would only, again speak with Mr Watson to convey the thanks for the event, and I would joking say, we'll look forward for the next year.

92. In so far as the household maintenance I can confirm that I would be in constant contact with Mr Mokonyane. He would tell me where to go and what to do. In some instances, after having spoken to Mr Mokonyane, another call would follow from Mr Watson, almost as if he was taking over from the point where Mr Mokonyane and I had stopped.

93. This did not surprise me, as I had known that the two were close friends. Again, as I emphasize, the role of PA is not to ask whether your gentlemen were together, or what were you discussing, mine is to listen attentively, make the necessary notes and start co-ordinating, with the aim to please.

94. The foregoing sums-up my participation, involvement and work for the family. I am unable to provide further detail due to the constraints of time.

95. Due to the deadline of filing this affidavit, I will present the information as set-out herein, and deal with any other outstanding issue at the hearing, or by a supplementary affidavit, in due course.



Deponent

I hereby certify that the deponent to this affidavit acknowledges to me that she has read this affidavit and she knows and understands the contents of this declaration. This affidavit was signed and sworn in my presence at La Grange and the deponent's signature was placed on the affidavit on this the 30 day of August 2020.

COMMISSIONER OF OATHS

Full names:

Designation and area:

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