



# **EXHIBIT CC 1(g)**

**RAJESH SUNDARAM**

**SUPPLEMENTARY  
AFFIDAVITS  
1 AND 2**



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

2<sup>nd</sup> floor, Hillside House  
17 Empire Road,  
Parktown  
Johannesburg  
2193  
Tel: (010) 214 to 0651  
Email: [inquiries@sastatecapture.org.za](mailto:inquiries@sastatecapture.org.za)  
Website: [www.sastatecapture.org.za](http://www.sastatecapture.org.za)

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

**AN INVESTIGATION INTO THE SOUTH AFRICAN BROADCASTING CORPORATION**

**SWORN SUPPLIMENTARY AFFIDAVIT**

I, the undersigned,

**RAJESH SUNDARAM**

hereby declare under oath as follows:

1. I am the son of K C Sundaram and resident of B2/301, Satyam Apartments, Vasundara Enclave, New Delhi- 100096, India.

2. I have been approached by investigators associated to the Commission of Inquiry into State Capture ("the Commission") and have been requested to provide an affidavit as to my knowledge as to the events which relate to meetings that took place between President Zuma and the Gupta's, during the establishment of a TV channel named ANN7.

3. The content of this affidavit is true and correct and falls within my own personal knowledge, unless the contrary clearly appears from the context or is otherwise stated.

4. I am the author of the book 'Indentured Behind the Scenes at Gupta TV'

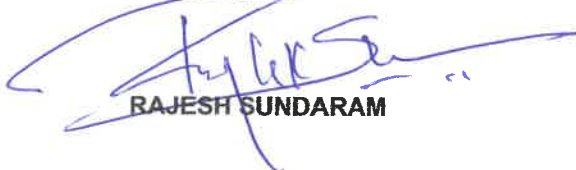


*[Handwritten signature]*

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published in March 2018 by Jacana Media, Johannesburg, South Africa.

5. The book is a true account of my experiences while working as 'Editor' during the setting up of ANN7 in 2013.
6. All quotations used in the book are not verbatim the words used in conversation by the people they are attributed to.
7. However, they convey an accurate gist of what was spoken by the individual quoted at that time to the best of my knowledge and memory.
8. I confirm that I started writing the book immediately on my arrival to India in 2013 and the events and conversations are accurately documented in the book.
9. All the information contained in this affidavit are true and to the best of my knowledge.
10. This is all I wish to declare.

  
RAJESH SUNDARAM



**ATTESTED**  
  
**NOTARY PUBLIC DELHI**

**22 JAN 2020**

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

**SUPPLEMENTARY AFFIDAVIT**

I, the undersigned,

**RAJESH SUNDARAM**

hereby declare under oath as follows:

1. I am the son of K C Sundaram and resident of B2/301, Satyam Apartments, Vasundara Enclave, New Delhi- 100096, India.
2. I have been approached by investigators associated to the Commission of Inquiry into State Capture ("the Commission") and have been requested to provide an affidavit as to my knowledge to the events which relate to meetings that took place between President Zuma and the Gupta's, during the establishment of a TV channel named ANN7.
3. The content of this affidavit is true and correct and falls within my own personal knowledge, unless the contrary clearly appears from the context or is otherwise stated.
4. This has reference to the affidavit filed by Mr. Moegsien Williams ("Mr. Williams"), deponent, before the commission dated 3<sup>rd</sup> June 2019.



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5. Paragraph's 1 through to 15 do not need a comment as they are not directly related to my statement or affidavits. I do however deny anything in these paragraphs that are contrary to the statements I have made.
6. In response to Paragraph's 16, I affirm that Mr. Williams was part of the meetings with then President Zuma as I have described in my supplementary affidavit.
- 6.1 Mr. Williams did not conduct any interviews or do any work that would contribute to the editorial content of the newspaper he edited at that time 'The New Age'. No other member of 'The New Age' editorial team was part of the meeting, furthermore:
- 6.2 Mr. Williams contributed in the meeting that reviewed for Mr. Zuma the status of the project and stayed on to discuss business and revenue for his newspaper after the TV presentation was over;
- 6.3 Apart from the people I have included in my supplementary affidavit, the meetings with Mr. Zuma mentioned in my statement and supplementary affidavits which were attended by Mr. Williams were also attended by Mr. Ajay Gupta, Mr. Atul Gupta and Mr. Nazeem Howa apart from the people I have described in my supplementary affidavit.
- 6.4 Mr. Williams omitted to mention that that he served as a director on the board of Infinity Media and had an interest in the commercial wellbeing and revenue growth of the company.



7. In response to Para 17, I would say that I firmly confirm all facts I have placed before the commission in the form of my oral statement, my affidavits and the contents of my book.
8. In response to Para 18 and 19, I absolutely endorse Mr. William's point that all evidence and 'allegations' made by me be 'properly tested with the view of determining the credibility and veracity of the allegations made.' I request the commission to also put all of Mr. Williams allegations through a proper test for the same reason.
- 8.1 As far as cross-examination by Mr. Williams or his legal team is concerned, I hereby state that I have no objections to being cross examination by him or any of the other deponents.
- 8.2 If the commission so requires, I am willing to appear for cross-examination through video conference or even in person at any time.
- 8.3 I strongly affirm all facts given in my oral statement, affidavits and book, "Indentured Behind the Scenes at Gupta TV"
9. I endorse Mr. William's view in Para 19, the section reads as
- 9.1 "I have confidence in the Evidence Leaders in that they will present all relevant evidence to the commissioner and that such evidence will be presented to the commission fairly and objectively."



A handwritten signature in blue ink, appearing to be "S. K. Bandyopadhyay", written over a horizontal line.

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10. Refer Para 20. I would urge Mr. Williams to reinforce the averments and claims made in his affidavit by giving evidence before the commission. The credibility of his averments and claims are in serious doubt if he refuses to do so.
11. Refer Para 20.1. As a director in Infinity media and being part of the team that included other directors of the company who discussed use of the presidents influence to boost revenues of the company and influence officials to benefit and favour 'The New Age' and 'ANN7', Mr. Williams in my view has committed a crime as I understand it. I am sure the commission will examine and investigate and unravel the truth.
12. Refer Para 20.2 I stand by all facts given to the commission during my oral statement, contained in my affidavits and book 'Indentured Behind the Scenes at Gupta TV.'
13. Refer 20.3 If Mr. Williams does not have any evidence, I would like to know on what basis he is denying the affidavits and evidence submitted by me.
14. Refer Para 21. I see Mr. Williams affidavit in reference to the facts submitted by me to the commission as a bundle of half-truths and absolute lies. The fact that he has refused to cross-examine me himself and give evidence to the commission or be cross examined himself speaks volumes about his intent and his dubious strategy. I see this as a





diversionary tactic to move the focus away from the real issues and serious changes.

15. Para 22 through to 36 are not in any way related to me. I deny anything in these paras that are contrary to anything in my oral statement, affidavits and contents of my book.
16. Refer Para 37 Mr. Williams has not revealed his so called 'reputation of professional and personal integrity' to me while I worked at Infinity media. I found him to be a close business associate of the Gupta brothers and Mr. Howa who never objected to any of the unethical and illegal dealings.
- 16.1 Mr. Williams was actively part of meetings with President Zuma and the Gupta brothers Ajay and Atul.
- 16.2 All details given in my book 'Indentured Behind the Scenes at Gupta TV' and my supplementary affidavit about these meetings is true to the best of my knowledge.
17. Refer para 38. Mr. Williams has incorrectly stated that the book was published shortly after I left South Africa in 2013. The fact is the book was published in March 2018.
18. Refer Para 38. These are bunch of lies spoken with an intention of misleading the commission. These allegations go against claims of 'personal integrity'.



- 18.1 I previously set up and ran two large television news stations after I resigned ANN7. These are News7Tamil based in Chennai, India and Cauvery News also based in Chennai, India. I worked as a consultant for various media clients in Mumbai and Jaipur during this time, furthermore I was an editorial consultant for Washington DC based Newspaper 'India America Today'.
- 18.2 I resigned from Cauvery News as 'News Director' in July 2018 to prepare for a kidney transplant that took place in January 19. I did this on medical advice.
- 18.3 However even during this time I was no dearth of offers for part time consultancy.
- 18.4 Mr. Williams lies show the desperation to somehow weave a web of lies to discredit a witness. His reluctance to give evidence or cross examine me or subject himself to cross examination should be seen in this light.
- 18.5 The disastrous launch of ANN7 had nothing to do with me. I have already explained in detail the circumstances and facts that led to the launch in my book 'Indentured Behind the Scenes at Gupta TV' and in my affidavits and oral statement.
- 18.6 My professional reputation has not been dented a bit by the launch of ANN7. I have a standing in the industry and years of hard work and good



will to back me.

- 18.7 My relationship with the Guptas is no secret and has been described in detail in my book and also in my oral statement and affidavits.
- 18.8 The number of copies of the book sold and the money I have made is a fraction of the money I make annually and had no impact on my financial stability. I have clearly stated the reason for me to write the book was to tell the South African people of the violations of laws and abuse I saw first-hand while launching ANN7 and to warn them to be vigilant about the contents of the news station, given that it was launched with the intention of being a propaganda station launched by a family that operated in violation of South African laws.
19. Refer Para 40. Mr. Williams knew the circumstances and conditions in which myself and the entire team at ANN7 were working during the launch. At that time he made no efforts to help me. Even when my life was under threat from the Gupta brother's, he chose not to help me. My phone calls pleading for his help went unheeded. I am a little perplexed by the contents of this para, as they are contrary to the sentiments and sensibilities of the Mr. Williams I knew in 2013.
20. Refer Para 41, Mr. William's affidavit in relation to my affidavits and the contents of my book 'Indentured Behind the Scenes at Gupta TV' are a bunch of misleading half-truths and absolute lies. I stand by all the facts given by me.



21. Para 43, 44, 45, 46,47 has no relevance to my submissions.

22. This is all I wish to declare.

  
RAJESH SUNDARAM



**ATTESTED**  
  
NOTARY PUBLIC DELHI

22 JAN 2020