

**JUDICIAL COMMISSION OF INQUIRY INTO ALLEGATIONS REGARDING  
EFFORTS OR ATTEMPTS HAVING BEEN MADE TO STOP THE  
INVESTIGATION OR PROSECUTION OF TRUTH AND RECONCILIATION  
COMMISSION CASES**

**INDEX TO ANNEXURES \_AFFIDAVIT OF NDPP – ADV S BATOHI**

<b>NO.</b>	<b>PARA NO.</b>	<b>DESCRIPTION</b>	<b>PAGE</b>
1	3	Letter to Adv S Batohi from Chief Evidence Leader, dated 23 September 2025	SB 00001 – SB 00002
2	10-16	National Prosecuting Authority Act, No 32 of 1998	SB 00003- SB 00023
3	18	NDPP Directive for matters falling outside of core PCLU mandate to be returned to DPPs (including TRC matters), 3 April 2019	SB 00024- SB 00025
4	20	Brief Notes on TRC matters from meeting between NPA and DPCI on 31 January 2020.	SB 00026
5	23	Invitation to FHR Workshop on 17 February 2021	SB 00027- SB 00029
6	23	NPA TRC Case Management Plan presented at FHR Workshop on 17 February 2021	SB 00030- SB 00037
7	23	Letter by NDPP to FHR following Workshop on 17 February 2021, dated 8 March 2021	SB 00038- SB 00039
8	24	DPSA Approval for Appointment of Additional Capacity to Prosecute TRC matters, 07 September 2021.	SB 00040- SB 00041
9	25	Appointment of Adv Singh as Acting State Advocate to assist with coordination of TRC Matters, 7 September 2021	SB 00042
10	25	Letter from DNDPP: NPS to Head DPCI informing him of establishment of TRC Component, dated 10 September 2021	SB 00043- SB 00044
11	28	Joint Media Statement issued by the NPA and DPCI, 27 June 2021	SB 00045- SB 00048
12	30, 43	NPA Presentation to PC on Justice and Correctional Services on TRC Prosecutions, 1 June 2022	SB 00049- SB 00062
13	31	Letter to NDPP from I Cajee, dated 31 January 2019	SB 00063- SB 00064
14	32	Minutes of meeting between NDPP and FHR and others on 17 April 2019	SB 00065- SB 00068
15	35	PMG Minutes from Portfolio on Justice and Correctional Services Meeting:	SB 00069- SB 00089

NO.	PARA NO.	DESCRIPTION	PAGE
		TRC prosecutions: NPA Progress Report, 1 June 2022.	
16	36	Internal Memo: TRC Matters – Communication with Victims and Families, dated 20 June 2022.	SB 00090-SB 00091
17	45	NPA Presentation to PC on Justice and Correctional Services on TRC Prosecutions, 25 November 2022	SB 00092-SB 00117
18	46	NPA Presentation to PC on Justice and Constitutional Development on TRC Prosecutions, 17 September 2024	SB 00118-SB 00159
19	48	NPA Response to FHR Submissions to the PC on Justice and Constitutional Development dated 27 March 2025.	SB 00160-SB 00199
20	49	NPA Presentation to PC on Justice and Constitutional Development on its response to FHR Submissions, dated 20 May 2025.	SB 00200-SB 00234
21	51-53	Rodrigues v National Director of Public Prosecutions of South Africa and Others (76755/2018) [2019]	SB 00235-SB 00279
22	55	Legal Opinion from Branch: Court Services, Department of Justice and Constitutional Development entitled: Appointment of Investigative Panel to Investigate Alleged Interference in the Prosecution of Cases Emanating from the Truth and Reconciliation Commission, (Joao Rodrigues vs NDPP of SA and Others), dated 2 April 2022	SB 00280-SB 00285
23	56	Memorandum from NDPP to Minister Lamola entitled: Appointment of Investigative Panel to investigate the alleged interference in the prosecution of TRC Cases (Joao Rodrigues vs NDPP of SA and Others), dated 18 May 2022	SB 00286-SB 00288
24	57	Legal Opinion: Implications of the High Court and SCA Judgments regarding Joao Rodrigues, dated 29 July 2022	SB 00289-SB 00298
25	58	Letter from Minister Lamola to NDPP entitled: Discussions on TRC Matters, dated 29 August 2022.	SB 00299-SB 00300
26	59	Memo from NDPP to Minister Lamola entitled: Discussion and Proposal on the Rodrigues TRC Matter, dated 5 October 2022.	SB 00301-SB 00305
27	60	NPA Press Release dated 13 January 2023	SB 00306-SB 00307
28	61	Final Opinion on the NPA's TRC Component and TRC Prosecutions by Adv Ntsebeza SC, received by the NPA on 2 November 2023.	SB 00308-SB 00387