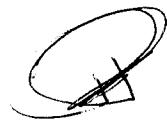


AFFIDAVIT

I, the undersigned, PATRICK CHARLES PRIOR (ID: 5403045088086) state under oath as follows:

1. I am an advocate of the High Court of South Africa practicing as such from the Intsika Group of Advocates, 13th Floor, The Marine Building, Durban.
2. I reside at 97 Ridgeside Road, Durban North, Durban.
3. I depose to this affidavit at the request of the TRC commission of enquiry as per email dated 28 October 2025 and simply convert the contents of my email into affidavit format.
4. I was employed by the TRC firstly as an evidence leader in the Amnesty Committee and later during 2000, as its Legal Officer.
5. As I have already explained to Ms Yasmin Sooka and Ms Thembekile Graham, when I was first contacted by them, *inter alia* that:
 - (a) The enquiries and/or subject matter regarding the matters listed in the attached schedule, occurred more than twenty years ago and due to effluxion of time my memory is not clear.


KVM

(b) In addition, I was not the author of the schedule to which reference is made and for which I am regarded as being supposedly responsible.

(c) When the work of the TRC came to an end and when I left the Commission, all documents in the possession of the Legal Department was handed over to the Department of Justice (Archive Dept).

(d) Save that my handwriting appears on document FA14, in manuscript format, I do not have any independent recollection of any factual details of the matters referred to in the schedule pertaining to the two hundred and twenty-six TRC cases.

(e) I never personally dealt with or was involved in any Amnesty Hearing concerning the subject matter of the cases referred to in the attached schedule. I point out that the Human Rights Investigations Section of the TRC was headed by Advocate Dumisa Ntsebeza and his professional team of investigators. In fact, a perusal of the TRC records of those matters and TRC files would indicate who was involved.

(f) The procedure as I recall, was that the application for amnesty for violations of human rights (such as Murder) would be identified according to the information provided in the written Application for



2
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Amnesty. The hearings would be then linked to a specific geographical region by themes such as political grouping and/or perpetrators. This process would be handled by the investigation Unit. The public amnesty hearings would then be managed by the Amnesty Department of the TRC who would then schedule hearings in the areas where the violations took place.

- (g) I was appointed as Legal Officer of the TRC, only after the resignation of Mr Haneef Vally who relocated to the United Kingdom.
- (h) In June 2022, I was contacted by Ms. Yasmin Sooka who was one of the Commissioners about this matter. She said that she had done so because it appeared that I had apparently dealt with these individual matters as there was correspondence between myself and Adv Ferreira of the NPA. I told her that I had no recollection of drafting such a document.
- (i) I informed her that my memory after such a long time was patchy, however the email appeared to be a photocopy of a document that had contained my handwriting in the manuscript portions.
- (j) The email marked FA 14 is undated but refers to receipt of correspondence by the TRC dated 31 August 2000.



KVM

(k) The email is purportedly signed on my behalf by someone with the initials RB, (as a CC -carbon copy) this indicates that I was either not available nor present at the time when the email was composed and/or the information was forwarded to Adv Ferreira. The initials RB were the initials of the late Robin Brink who was also an evidence leader with the TRC.

(l) I find the format of the email unusual. It was not the usual way my Office as the Legal Officer of the TRC would communicate with the National Prosecuting Authority, which I submit would have been in the nature of a more formal letter.

(m) The word “Files” in the heading of the email was mis-spelled and clumsily corrected in manuscript.

6. Unless specific questions or matters are identified, I cannot be of any assistance in respect of any the matters listed in the attached schedule.



DEPONENT

KVM

I CERTIFY THAT the deponent has acknowledged that he knows and understands the contents of this affidavit which was signed and sworn to before me at DURBAN on this 4TH day of OCTOBER 2025 under compliance with the Regulations contained in Government Notice No. R. 1258 published in the Government Gazette No. R.3619 dated 21 July 1972 as amended.



COMMISSIONER OF OATHS