

**IN THE HIGH COURT OF SOUTH AFRICA
(WESTERN CAPE DIVISION, CAPE TOWN)**

CASE NO.: 10607/24

In the matter between:

THE DEMOCRATIC ALLIANCE

Applicant

and

MY VOTE COUNTS NPC

First respondent

PRESIDENT OF THE REPUBLIC OF SOUTH AFRICA

Second respondent

**MINISTER OF JUSTICE AND
CORRECTIONAL SERVICES**

Third respondent

MINISTER OF HOME AFFAIRS

Fourth respondent

ACTING SPEAKER OF THE NATIONAL ASSEMBLY

Fifth respondent

In re:

MY VOTE COUNTS NPC

Applicant

and

PRESIDENT OF THE REPUBLIC OF SOUTH AFRICA

First respondent

**MINISTER OF JUSTICE AND
CORRECTIONAL SERVICES**

Second respondent

MINISTER OF HOME AFFAIRS

Third respondent

ACTING SPEAKER OF THE NATIONAL ASSEMBLY

Fourth respondent

NOTICE OF MOTION: APPLICATION TO INTERVENE

TAKE NOTICE THAT the applicant (the Democratic Alliance, hereafter "**the DA**") intends to make application to this Court for an order in the following terms:

1. The DA is granted leave to intervene in the application brought under the above case number by My Vote Counts NPC ("**MVC**" and "**the main application**") as the fifth respondent.
2. The main application is dismissed.
3. In the alternative to prayer 2 above, in the event that the main application is not dismissed, and with retrospective effect from 8 May 2024 —
 - 3.1. it is declared that the limit ("**the donation limit**") referred to in section 8(2) of the Political Funding Act 6 of 2018 as amended by the Electoral Matters Amendment Act 14 of 2024 ("**the Act**") is R15 000 000 (fifteen million rand), for as long as the President does not set a different donation limit in terms of regulation 7 of Schedule 2 to the Funding Act; and
 - 3.2. it is declared that the threshold referred to in section 9(1)(a) of the Act ("**the disclosure threshold**") is R100 000 (one hundred thousand rand), for as long as the President does not set a different disclosure threshold in terms of regulation 9 of Schedule 2 to the Funding Act.
4. MVC shall pay the DA's costs on Scale B.
5. Further and/or alternative relief.

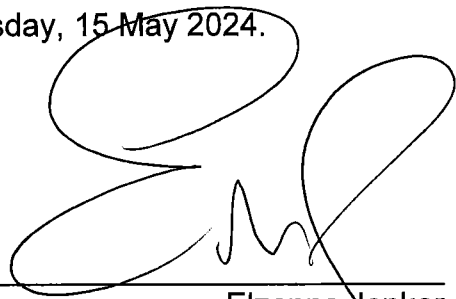
TAKE NOTICE FURTHER THAT the accompanying affidavit of **ELZANNE MUREEN JONKER** will be used in support thereof.

TAKE NOTICE FURTHER THAT the DA has appointed the address of its attorneys of record set out below at which it will accept notice and service of all process in these proceedings, and that the DA consents to service via email.

TAKE NOTICE FURTHER THAT if you intend opposing this application you are required to —

- a) file a notice of intention to oppose by 17h00 on Tuesday, 14 May 2024; and
- b) file your answering papers by 17h00 on Wednesday, 15 May 2024.

Dated at Cape Town this Tuesday, 14 May 2024.



Elzanne Jonker

MINDE SCHAPIRO AND SMITH INC.

Applicant's attorneys

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Building 1

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Belville

CAPE TOWN

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TO THE REGISTRAR OF THE ABOVE COURT

AND TO: WEBBER WENTZEL
First Respondent's Attorney
90 Rivonia Road
Sandton

Johannesburg

Tel: 011 530 5867

Email: vlad.movshovich@webberwentzel.com;

daniel.rafferty@webberwentzel.com;

ahmed.rajana@webberwentzel.com

gaasim.ganey@webberwentzel.com

C/O Webber Wentzel

15th Floor Convention Tower

Heerengracht

Foreshore

Cape Town

8001

AND TO: **PRESIDENT OF THE REPUBLIC OF SOUTH AFRICA**
Second Respondent

Tuynhuys Building, Parliament Street, Cape Town

Private Bag X1000, Cape Town, 8000

Email: president@po.gov.za / presidentrsa@po.gov.za

Tel: 021 464 2184

Fax: 021 461 2838

AND TO: **MINISTER OF JUSTICE AND CORRECTIONAL SERVICES**
Third Respondent

Room 510, 5th Floor, 120 Plein Street, Cape Town

Private Bag X256, Cape Town, 8000

Email: Ministry@justice.gov.za / LKgasi@justice.gov.za

Tel: 021 467 1700

Fax: 021 467 1730

AND TO: **MINISTER OF HOME AFFAIRS**
Fourth Respondent

Hallmark Building, 230 Johannes Ramokgoase Street, Pretoria

Email: Carmen.h@dha.gov.za

AND TO: **STATE ATTORNEY, PRETORIA**
Authorised to accept service on behalf of the second to fourth respondents

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Cape Town

P.O Box 9001, Cape Town, 8000

Tel: 012 441 9200

Email: skarjiker@justice.gov.za; fmbeki@justice.gov.za

AND TO:

THE SPEAKER OF THE NATIONAL ASSEMBLY

Fifth Respondent

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Cape Town

Email: speaker@parliament.gov.za; pmasiza@parliament.gov.za

IN THE HIGH COURT OF SOUTH AFRICA
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CASE NO.: 10607/24

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ACTING SPEAKER OF THE NATIONAL ASSEMBLY

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SUPPORTING AFFIDAVIT: APPLICATION TO INTERVENE

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I, **ELZANNE MUREEN JONKER**, declare under oath:

1. I am an adult female attorney and a director at Minde Schapiro and Smith Inc., the applicant's attorneys of record. I am duly authorised to depose to this affidavit on behalf of the applicant (the Democratic Alliance, hereafter "**the DA**"), which has resolved to bring this application to intervene in the main application and to oppose it.
2. The facts contained in this affidavit are to the best of my belief both true and correct. They fall within my personal knowledge or are apparent from documentation under my control, including the papers filed in this matter and in related proceedings.
3. Where I make legal submissions, I do so on the basis of my own knowledge and legal advice received from counsel, which I believe to be correct; without any waiver of privilege.

INTRODUCTION

4. This is an application to intervene, as the fifth respondent, in the main application launched under the above case number by My Vote Counts NPC ("**MVC**").
5. In respect of the main application:
 - 5.1. The DA opposes the main application and seeks that it be dismissed. The reason the main application falls to be dismissed is that there is no lacuna in the law – because section 11 of the Interpretation Act 33 of 1957 operates to keep alive the donation limit and the disclosure

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threshold which existed prior to the coming into force of the Electoral Matters Amendment Act 14 of 2024 (“**the Amendment Act**”), for as long as the President does not set a new donation limit and disclosure threshold in terms of regulations 7 and 9 of Schedule 2 of the amended Political Funding Act 6 of 2018 (“**the Funding Act**”).

- 5.2. *In the alternative*, the DA seeks that this Court issue a declaratory order stipulating that the pre-amendment *status quo* remains in the manner set out in the previous paragraph.
6. This affidavit serves as the founding affidavit to the DA’s intervention application, as well as the DA’s answering affidavit to the main application.
7. The notice of motion in the main application required answering papers to be filed by last Friday, 10 May 2024. Given that the DA only learned of this application on Monday, 13 May 2024, it was not possible for the DA to comply with this deadline. The DA has filed this affidavit as soon as it could, given when it learned of the application (as set out below). To extent that condonation is required and not agreed to by MVC, it will be sought from the bar at the hearing.
8. MVC’s application is an exercise in hysterics. It seeks to stoke panic where there is no basis for it. Instead of interpreting legislation to avoid unconstitutionality, it adopts an obviously absurd interpretation in order to justify this self-serving application.

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THE DA HAS A DIRECT AND SUBSTANTIAL INTEREST IN THE MAIN APPLICATION

9. The DA is a duly registered political party with its main offices at 2nd Floor, Theba Hosken House, 16 Mill Street, Gardens, Cape Town. Under its federal constitution, the DA is a body corporate with perpetual succession, capable of suing in its own name.
10. The DA is contesting the national and provincial elections to be held on 29 May 2024, in every province.
11. The DA plainly has a direct and substantial interest in the main application:
 - 11.1. As a registered political party, it is required to comply with the donation limit in section 8(2) of the Funding Act (“**the donation limit**”) and the disclosure threshold in section 9(1)(a) thereof (“**the disclosure threshold**”). The relief sought in the main application relates to the donation limit and disclosure threshold.
 - 11.2. Moreover, MVC seems in the main application to intend to make broad arguments relating to the extent to which the Constitution (a) prohibits large private donations and (b) requires the disclosure of small private donations. These are issues in which the DA has a direct and substantial interest, given that it receives substantial sums in private donations every year. Any findings this Court makes in respect of these arguments will be marshalled by MVC in other litigation which the DA is opposing (more about this below).
12. MVC cannot seriously deny that the DA has the requisite interest:

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- 12.1. In paragraph 12 of its founding papers in the main application, MVC makes an oblique reference to “*a related matter, dealing with a challenge to similar provisions of [the Funding Act] (under WCC case no 7630/2023)*”. This “*related matter*” (which I call “**the 2023 application**”) is of importance to this application and it is regrettable that MVC did not take this Court into its confidence and make full disclosure of the details relating to this application.
- 12.2. In the 2023 application, MVC asks that *inter alia* sections 8(2) and 9(1)(a) of the Funding Act (i.e., the provisions that contain the donation limit and disclosure threshold) be declared unconstitutional. I annex a copy of the notice of motion in the 2023 application marked “**DA1**”.
- 12.3. It is MVC’s argument in the 2023 application that the Constitution requires (a) that the donation limit be lower than R15 million and (b) that the disclosure threshold be done away with altogether, the effect being that all donations, no matter how small, must be disclosed to the public.
- 12.4. MVC cited the DA as the sixth respondent in the 2023 application (and cited in addition all other political parties currently represented in the National Assembly). The DA is opposing the 2023 application and has filed a comprehensive answering affidavit. The 2023 application is also being opposed by ActionSA and the Economic Freedom Fighters (in addition to by the State).
- 12.5. Given that MVC accepts that the DA has the requisite interest to be cited in the 2023 application, it is baffling why MVC failed to cite the DA (or

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any other political party) in the main application, given that they deal with substantially overlapping issues.

13. Indeed, it is difficult to escape the conclusion that MVC is attempting to steal a march on the DA (as well as the other parties cited in the 2023 application, all of whom have an interest in the main application) by failing to cite them. It knows that have an interest, given that (a) this is self-evident, for the reasons stated above (b) MVC cited represented political parties in the 2023 application and (c) the DA and other political parties are opposing the 2023 application. Yet MVC failed to cite any political parties in the main application, including the DA, or even to notify them. This conduct is inexplicable and should be deprecated.
14. The DA only learned of this application fortuitously at around 9h30 on Monday, 13 May 2024, when one of its counsel briefed in the 2023 application saw an update by MVC relating to the main application on X (formerly Twitter). This application was prepared shortly thereafter.

THE MAIN APPLICATION FALLS TO BE DISMISSED

15. The main application rests on the proposition that there is a lacuna in the law. Specifically, that the amendments to regulations 7 and 9 of Schedule 2 to the Funding Act have the effect that —
 - 15.1. there is currently no donation limit, meaning that political parties are free to accept donations of any size (including donations above the R15 million donation limit imposed by the pre-amendment regulation 7);
and

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- 15.2. there is currently no disclosure threshold, meaning that political parties do not have to disclose any donations (including donations above the R100 000 disclosure threshold imposed by the pre-amendment regulation 9).
16. As a matter of law, this proposition is incorrect. There is no lacuna. This is because the pre-amendment regulations 7 and 9 of Schedule 2 of the Funding Act (and thus the pre-amendment donation limit and disclosure threshold) remain in effect by operation of section 11 of the Interpretation Act, which provides as follows:
- “11 Repeal and substitution**
- When a law repeals wholly or partially any former law and substitutes provisions for the law so repealed, the repealed law shall remain in force until the substituted provisions come into operation.”
17. The effect of section 11 in this context is that the pre-amendment donation limit and disclosure threshold remain in effect until new ones are imposed in accordance with the procedure stipulated in the post-amendment regulations 7 and 9 (i.e., by Presidential proclamation on the advice of the National Assembly).
18. This is also the interpretation that saves s 9(1)(a) from unconstitutionality. The DA accepts that the Constitution requires that parties must disclose some category of donations. If the amendment had the drastic and bizarre effect MVC contends for, it would violate that constitutional principle. But it is possible to interpret the provision to avoid that outcome, and to save it from unconstitutionality. This Court must adopt that interpretation.

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19. The DA does not accept that the Constitution requires a donation limit. The Constitutional Court has never addressed this issue. Whether the Constitution requires a disclosure limit at all and, if so, whether R15 million is too low, is an issue in dispute between it and MVC in the 2023 application. It would be pre-empt the dispute in that application to decide it in this one. MVC is precluded from advancing that argument while it is also litigating the same issue in parallel in the 2023 application. In any event, the issue does not arise because, properly interpreted, the amendments do not create a lacuna on the donation limit.
20. Given that there is no lacuna, there is no basis for the relief sought in the main application. Properly interpreted, the donation limit and the disclosure threshold remain in place until the President and Parliament adopt new ones. The application falls to be dismissed for that reason.
21. An additional reason that the main relief should not be granted is material non-joinder. All registered political parties and independent candidates contesting the 2024 elections, as well as the Electoral Commission, have an interest in the relief sought. Yet MVC has joined none of them. The Electoral Commission is the entity responsible for monitoring and enforcing the Funding Act. MVC cited it in the 2023 application. Yet it has not cited it here.

ALTERNATIVE DECLARATORY RELIEF

22. In the event that this Court is not minded to dismiss the main application, it would be appropriate for this Court to issue declaratory relief stipulating that the pre-amendment donation limit and disclosure threshold remain in effect until changed under the post-amendment procedure. The only difference between this and the

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DA's primary argument is that the Court would declare the effect of its interpretation in its order, rather than only in its judgment.

23. It is submitted that the requirements for declaratory relief are satisfied:

23.1. The declaratory relief would reflect the correct legal position, as set out in the previous section.

23.2. The DA has an interest in the obligations imposed by section 8(2) and section 9(1)(a) of the Funding Act.

23.3. Should this Court not dismiss the main application, it would be an appropriate case for declaratory relief to be granted. It would resolve a live issue of relevance to the parties and of public importance in the lead-up to the elections on 29 May – whether, after the Amendment Act, a donation limit of R15 million and a disclosure threshold of R100 000 continue to apply to political parties and independent candidates.

SERIAM RESPONSE

24. I turn to respond to the founding affidavit *seriatim*. I do not repeat myself. Any allegation in the founding affidavit that is inconsistent with any allegation in this affidavit must be taken to be denied. I also do not respond to all legal argument. Any legal argument not conceded is contested.

Ad para 7 (inclusive)

25. The DA does not contest MVC's standing.

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Ad paras 18 to 20

26. I deny that it is the President's "*sole discretion*" to determine the donation limit and disclosure threshold post-amendment. The President does so on the advice of the National Assembly.
27. In any event, whether it is constitutional for the President to determine the donation limit and disclosure threshold is at issue in the 2023 application. It is inappropriate for this issue to be considered by this Court, given that MVC is litigating the same issue under a different case number, these are urgent proceedings, and given that all interested parties (including those cited in the 2023 application) have not been joined.

Ad para 22

28. I deny each allegation in this paragraph. Without limitation, I deny that there is any lacuna, for the reasons set out above.
29. The extent to which it would be unconstitutional for there to be no donation limit at all, and the level at which the Constitution requires the disclosure threshold to be, are already before this Court in the 2023 application. It is not appropriate for this Court to consider these issues, given (a) they are before this Court in the 2023 application, a matter that is not being considered urgently and to which all interested parties are joined and (b) this application can be resolved without considering them.

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Ad para 23

30. The National Assembly and the President's understanding of the law is, with respect, incorrect. There is no lacuna in the law.

Ad para 24

31. I deny each allegation and conclusion of law in this paragraph. There is no lacuna.

32. The reference to "*undue influence by certain companies and actors in South Africa's political and governance system*" is so vague so as to have no evidentiary weight. I deny that South Africa's constitutional democracy is in any peril by virtue of the impugned provisions in the Amendment Act. It provides no evidence whatsoever for its hyperbolic claims.

33. I can state expressly that the DA has interpreted the Amendment Act in the manner set out above, will continue to disclose all donations above R100 000, and will not accept cumulative donations above R15 million.

Ad para 27

34. MVC does not incorporate the quoted portion by reference, and so it is not necessary for me to respond to it. For the avoidance of doubt, I deny each allegation in the quoted portion.

Ad para 39

35. I deny that there is any lacuna, as set out above.

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Ad paras 40 to 42

36. For the reasons set out above, I deny that there is any prospect of unchecked secret funding of political parties in the lead-up to the elections by virtue of the impugned portions of the Amendment Act. As MVC has chosen not to cite any political party, it makes the allegation without any risk of being contradicted by political parties that – like the DA – continue to adhere to the obvious and reasonable meaning of the law: the donation limit and the disclosure threshold remain in place.

Ad paras 43 to 44

37. There is no basis for the granting of the relief sought. This is because the state of the law is already what MVC seeks to have implemented through the interim relief it seeks.

Ad paras 45 to 49

38. The DA does not take a stance on whether the application is urgent. But the time it has permitted for opposition is far too short to justify the weighty relief sought – the indefinite suspension of legislation.

39. I have advised the DA that, while this Court may have the power to suspend the operation of legislation, it is a power that will be exercised with extreme caution and only to avoid a constitutional crisis. As MVC puts up no evidence at all of a crisis, the relief is plainly not just and equitable.

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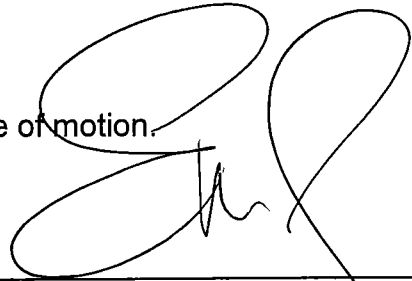


40. If MVC is entitled to an urgent hearing, then the intervention application is similarly entitled to an urgent hearing so as to facilitate the DA's participation in the main application.

COSTS

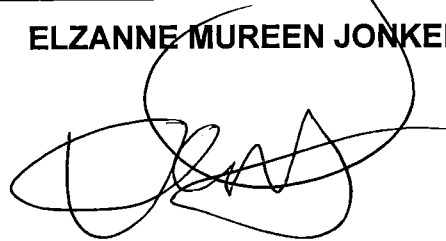
41. Should the DA be successful, costs should follow the result. Should the DA be unsuccessful, the DA should not be mulcted in costs by virtue of the *Biowatch* principle. MVC should recover its costs from the state respondents that are responsible for any unconstitutionality.

WHEREFORE I pray for the relief sought in the notice of motion.



ELZANNE MUREEN JONKER

Signed and sworn before me at Cape Town on Tuesday, 14 May 2024, the deponent having acknowledged that she knows and understands the contents of the affidavit, that she has no objection to taking the prescribed oath and that she considers it binding on her conscience.



COMMISSIONER OF OATHS

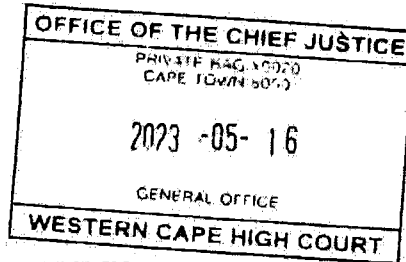
KAYLA VAN DER VENT
Commissioner of Oaths
Practising Attorney R.S.A
43 Old Oak Road, Bellville, 7530

**IN THE HIGH COURT OF SOUTH AFRICA
WESTERN CAPE DIVISION, CAPE TOWN**

CASE NO: 7630/23

In the matter between:

MY VOTE COUNTS NPC



Applicant

and

**PRESIDENT OF THE REPUBLIC OF SOUTH
AFRICA**

First Respondent

**MINISTER OF JUSTICE AND
CORRECTIONAL SERVICES**

Second Respondent

MINISTER OF HOME AFFAIRS

Third Respondent

INDEPENDENT ELECTORAL COMMISSION

Fourth Respondent

AFRICAN NATIONAL CONGRESS

Fifth Respondent

DEMOCRATIC ALLIANCE

Sixth Respondent

ECONOMIC FREEDOM FIGHTERS

Seventh Respondent

INKATHA FREEDOM PARTY

Eighth Respondent

NATIONAL FREEDOM PARTY

Ninth Respondent

UNITED DEMOCRATIC MOVEMENT

Tenth Respondent

FREEDOM FRONT PLUS

Eleventh Respondent

CONGRESS OF THE PEOPLE

Twelfth Respondent

AFRICAN CHRISTIAN DEMOCRATIC PARTY

Thirteenth Respondent

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AFRICAN INDEPENDENT CONGRESS	Fourteenth Respondent
PAN AFRICANIST CONGRESS	Fifteenth Respondent
AFRICAN TRANSFORMATION MOVEMENT	Sixteenth Respondent
GOOD PARTY	Seventeenth Respondent
AL JAMA-AH	Eighteenth Respondent

NOTICE OF MOTION

TAKE NOTICE THAT the applicant intends to make application to the above Honourable Court on a date to be determined by the Registrar, for an order in the following terms:

1. declaring sections 8(2), 9(1)(a), 9(2), 12(2)(d)(ii), 12(3)(c), 22 and 24(1) of, and regulations 7 and 9 in Schedule 2 to, the Political Party Funding Act, 2018 ("**the PPFA**") to be inconsistent with the Constitution and invalid;
2. to the extent necessary, declaring the PPFA and the Promotion of Access to Information Act, 2000, to be inconsistent with the Constitution and invalid to the extent set forth in the founding affidavit of Minhaj Jeenah dated 11 May 2023, *alternatively* the Court's judgment;
3. suspending the above declarations of invalidity, save to the extent set forth in 3.1 and 3.2 below, for 12 months ("**the suspension period**") and directing Parliament to remedy the defects in the PPFA (including Schedule 2 thereto), in accordance with the Court's judgment, within the suspension period:

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- 3.1 the declaration of invalidity of section 9(1)(a) of, and regulation 9 of Schedule 2 to, the PPFA shall be effective as from the date of the Court's order with full retrospective effect;
- 3.2 during the suspension period, section 9(2) of the PPFA shall read as follows: "*A person or entity that makes a donation must disclose that donation to the Commission in the prescribed form and manner.*"
4. In the event that Parliament does not remedy the constitutional defects in accordance with the Court's order and/or judgment, within the suspension period, paragraphs 3.1 and 3.2 shall continue to apply;
5. directing the first to third respondents, jointly and severally with any other respondent who may oppose the relief sought in this application, to pay the applicant's costs, including the costs of two counsel;
6. ordering further and/or alternative relief.

TAKE NOTICE FURTHER that the accompanying affidavit of **MINHAJ JEENAH** will be used in support of this application.

TAKE NOTICE FURTHER that the applicant has appointed **Webber Wentzel** as its attorneys of record, and **c/o Webber Wentzel, 15th Floor, Convention Tower, Heerengracht, Foreshore, Cape Town**, as the address at which the applicant will accept notice and service of all documents in these proceedings.

TAKE NOTICE FURTHER that, if you intend opposing this application, you are required:

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- (a) within 15 days after receipt of this notice of motion, to deliver notice to the applicant that you intend to oppose and in such notice to appoint an address within 15 kilometres of the office of the Registrar at which you will accept notice and service of all documents in these proceedings; and
- (b) within 15 days of giving notice of your intention to oppose the application, to deliver your answering affidavit(s), if any.

TAKE NOTICE FURTHER that if no such intention to oppose is given, application will be made to the above Honourable Court for an order in terms of the notice of motion on _____ at 10h00 or so soon thereafter as counsel may be heard.

Dated at Johannesburg on 15 May 2023.

Kubi

A handwritten signature in black ink, consisting of a stylized, cursive 'K' followed by a large, circular flourish.

**WEBBER WENTZEL****Applicant's attorneys**

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2196

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To:
THE REGISTRAR
Cape Town

And to:
PRESIDENT OF THE REPUBLIC OF SOUTH AFRICA
First Respondent
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Email: president@po.gov.za / presidentrsa@po.gov.za
Tel: 021 464 2184
Fax: 021 461 2838

BY SHERIFF

KJVV

