

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

**CASE NO: 2024-10607**

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

**ACTING SPEAKER OF THE NATIONAL ASSEMBLY**

Fourth Respondent

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**FILING SHEET**

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Documents present for filing:

1. The Third Respondents' Answering Affidavit

**DATED at JOHANNESBURG on this the 16<sup>th</sup> day of MAY 2024.**

  
**STATE ATTORNEY, JOHANNESBURG  
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**TO: THE REGISTRAR OF THE ABOVE COURT  
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**AND TO: WEBBER WENTZEL  
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**IN THE HIGH COURT OF SOUTH AFRICA  
(WESTERN CAPE DIVISION, CAPE TOWN)**

**CASE NO.: 10607/24**

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**

**ACTING SPEAKER OF THE NATIONAL ASSEMBLY**

**Fourth Respondent**

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**THIRD RESPONDENT'S ANSWERING AFFIDAVIT**

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I, the undersigned

**LIVHUWANI TOMMY MAKHODE**

do hereby make oath and state that:



*L.T.*

1. I am the Director-General in the employ of the Department of Home Affairs ("DHA"), with offices at Hallmark Building, 230 Johannes Ramokhoase, Pretoria, Gauteng Province.
2. The facts contained herein are, unless the context clearly indicates the contrary, within my personal knowledge and are true and correct.
3. I am the accounting officer of the DHA and, as such, I am competent and duly authorized to depose to this affidavit on behalf of the third respondent ("Minister").
4. Where I rely on information communicated to me by third parties (who are identified hereunder) I verily believe such information to be true and correct. Where I make submissions of a legal nature, I do so on the advice of my legal representatives which advice I believe to be true and correct.
5. I have read the application and respond thereto as set out herein below. To the extent that the founding affidavit may contain inconsistent averments with the content of this affidavit, all such allegations are disputed. Similarly, if I do not deal with any averment in the application, such omission is not to be regarded as an admission on the part of the Minister.



K.T.

6. Before I address the merits of the application, I first wish to address certain background facts and raise preliminary points to this application.

## **THE BACKGROUND TO THE BRINGING OF THIS APPLICATION**

7. The applicant ("MVC") launched these proceedings on severely truncated timelines on 9 May 2024. Ostensibly, MVC brought these proceedings after the enactment of the Electoral Matters Amendment Act 14 of 2024 ("EMAA") which was assented to by the first respondent ("President") and came into effect on Wednesday, 8 May 2024. The MVC( on a future date) specifically seek to challenge the constitutionality of the provisions of the EMAA and its effect on regulations 7 and 9 of schedule 2 of the Political Party Funding Act ("PPFA").
8. The application was then apparently drafted and launched on Thursday, 9 May 2024. At a consideration of the founding papers, a copy of the unsigned papers which had not as yet been issued, as evidenced by "FA1A", was sent by way of email communications to the Office of the State Attorney, Cape Town on 9 May 2024 at approximately 15:50. The application was not served electronically on the Minister. The email address [carmen.h@dha.gov.za](mailto:carmen.h@dha.gov.za) appearing on the notice of motion does not exist in the DHA's records.

9. I am advised that a copy of the signed and issued papers were then served on the offices of the State Attorney, Cape Town on Friday, 10 May 2024 after the opening of its offices at 08:00
10. The urgent application served on the State Attorney, Cape Town, was served on severely truncated timelines in which the state respondents were required to file their notice of opposition by 09h00 (i.e. within an hour of being served with the issued papers) and thereafter to file their answering papers by no later than 11:00 (i.e. within two hours after being served with the issued papers). Such terse timelines would have implied that it would have been near impossible for the Minister to consider the papers, provide instructions to the State Attorney and to procure the services of counsel to appear in a matter of significant importance and in which MVC seeks far-reaching relief against the state respondents.
11. Moreover, I am advised the applicant had by then, not served the National Assembly, as required in terms of the prescripts of section 5 of the Powers, Privileges and Immunities of Parliament and Provincial Legislatures Act, 4 of 2004. Thus, when the matter came before court at 14:00 on Friday, 10 May 2024, the Acting Speaker and, thereby also, the National Assembly had not had any sight of the application nor was he aware of the relief sought against the National Assembly.

12. As a result of these shortcomings in proper service of the papers, this Court postponed the matter for hearing to Friday, 17 May 2024. Whilst, the Minister is grateful for this indulgence granted by the Court, it is bears mentioning that this answering affidavit had to be drafted and deposed to with an extreme degree of alacrity, especially in circumstances where most of the time the Minister and I operate from offices in Pretoria. Furthermore, the Minister is also traveling around the country due to the upcoming general elections on 29 May 2024. The deadlines given were extremely unreasonable.

13. The opposition by the Minister is, however, of crucial importance given the role played by the DHA and Minister in the legislative process leading to the enactment of EMAA. Much of the opposition to the relief sought by MVC is premised on very important legal and constitutional principles which would be implicated should the relief be granted as prayed for.

14. I now turn to the points *in limine*.

#### **FIRST POINT *IN LIMINE*: THE LACK OF URGENCY**

15. The timelines outlined in paragraphs 9 to 12 above, is indicative of the extraordinarily short notice provided to the Minister and the other state respondents to answer to the extraordinary application of MVC.

16. It is also apparent from the papers that the MVC was well aware of the passing of the Electoral Matters Amendment Bill, which was passed by the National Assembly on 12 March 2024 and thereafter by the NCOP on 19 March 2024. It then embarked on a series of demands directed\* to the Presidency, to not assent to the EMAA but to rather remit it back to Parliament (for what the MVC believed to be) that certain provisions of EMMA are unconstitutional.
17. The Minister will not address the issue of the communications between MVC and the Presidency and defers any allegations regarding this to the Presidency and its legal team. Suffice to state that the thrust of the objection to EMAA is misconceived. There is no unconstitutionality regarding the amendments brought about to the upper limit and thresholds of the PPFA and amended regulations in terms of section 29 (g) and (h) of EMAA. MVC has not challenged the constitutionality of the impugned provisions and electing rather to bring the constitutional challenge within 20 days of the date of the order.
18. Furthermore, the constitutionality of the amendments brought about to the PPFA, and its regulations are already the subject of a constitutional challenge in this Court under case number 7630/2023. This is evident on the MVC's own version<sup>1</sup>.
19. Thus, whilst the MVC may have engaged the Presidency in the manner which it did following the passing of the Bill in March 2024, it had already indicated of its

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<sup>1</sup> See para 12 of the FA.

instructions to approach this Court on an urgent basis should its demands not be met. This is evident from the content of "FA5".

20. Instead, the MVC opted to bring this application on an extremely truncated timelines of literally two hours' notice to the Minister and the other state respondents. In fact, as stated above, the Speaker and Parliament were not even properly served at the time of the hearing of the matter on 10 May 2024.

21. Thus, on a conspectus of all of the facts, it is evident that the extreme urgency on which the MVC brought this application, was orchestrated to take the Minister and other state respondents by surprise in order to secure an order that would have been tantamount to an *ex parte* order. The application also served the secondary purposes of seeking an Urgent Court to deliberate and determine what is essentially the merits of the application under case number 7630/2023, which is currently opposed and to be heard in the normal course.

22. The Minister's position regarding the lack of urgency is bolstered by the fact that the alleged reasons advanced by MVC for its urgent approach this Court, is rendered meaningless by the provisions of section 11 of the Interpretation Act 33 of 1957, which clearly entails that the pre-amendment limits and thresholds would remain in place during the *interregnum* period. The same applies to section 27 (5) of EMAA (amendment of section 24 of PPFA) which reads:

***"(5) Each regulation in Schedule 2 is a transitional regulation and shall become inoperative on the date that a regulation replacing the said regulation made by the President in terms of subsection (1) becomes effective".***

23. Section 27 (5) of EMAA must be subjected to proper interpretation and read in harmony with section 11 of the Interpretation Act. There is, therefore, no *lacuna* as alleged by MVC. Absent any such *lacuna* the application would lack any semblance of urgency.
24. For all of the reasons set out in this affidavit, it is glaringly evident that the urgency of the application was contrived and is tantamount to an abuse of court process. The application accordingly falls to be struck off the roll, alternatively, dismissed outright, for this reason alone, with costs.

#### **SECOND POINT IN LIMINE: THE NON-JOINDER OF INTERESTED PARTIES**

25. MVC seeks to challenge the PPFA and certain provisions of EMAA and specifically the amended regulations 7 and 9 of schedule 2. The very essence of the PPFA and EMAA is to regulate certain donations received from private donors and the reporting duties imposed on political parties and independent candidates where such donations exceeded the upper limit set by the President. Where such donations trigger the provisions of the PPFA, political parties are to report this to

the IEC, who records and preserves the information of donations for purposes of possible public enquiries.

26. On a proper reading of the relevant provisions of the PPFA and EMAA and the reporting duties imposed on the political parties as well as the recording and preservation of information by the Independent Electoral Commission ("IEC"), any order sought by MVC would directly impact on IEC and political parties currently represented in Parliament.

27. However, notwithstanding the substantial and direct interest in the outcome of the matter, MVC has failed to cite or even serve the political parties and the IEC. The Democratic Alliance ("DA") had to bring an intervention application to be heard. The Minister will not oppose the intervention application brought by the DA. However, its alternative relief will be opposed.

29. The non-joinder of the political parties and the IEC, who stand to be impacted by any order issued by this Court is in stark contrast, to the position adopted by MVC who cited all the state respondents, together with the political parties and the IEC in the pending application under case number 7630/2023. Thus, MVC cannot escape the consequences of this obvious defect in its application, which cannot be condoned under any circumstance. The MVC has made its own bed and it must lie on it.

30. In view of the foregoing, the application falls to be dismissed with costs, for this reason alone.

**THIRD POINT *IN LIMINE*: THE PERSONAL KNOWLEDGE OF THE DEPONENT AND/OR LACK OF ANY RESOLUTION BY MVC**

31. The Minister notes that the deponent to the founding affidavit is a certain Mr Qaasim Akbar Ganey ("Mr Ganey"). Mr Ganey describes himself as a trainee attorney in the employ of Webber Wentzel.

32. Mr Ganey then proceeds to state that the information contained in the founding affidavit falls within his personal knowledge. He also states that he relies on the advice of MVC's legal representatives.

33. Whilst some of the content of the affidavit relates to correspondence between the offices of Webber Wentzel and the Presidency, the main thrust of the affidavit relates to the history of MVC and encapsulates a historical account of litigation in which MVC has challenged private funding of political parties. Moreover, the correspondence between Webber Wentzel and the Presidency was authored by Mr Vlad Movshovich, a director of Webber Wentzel. More recently, communications between Webber Wentzel and the Office of the State Attorney, Cape Town, was authored by a Mr Ahmed Rajan ("Mr Rajan"), a senior associate of Webber Wentzel.

34. However, notwithstanding this, no confirmatory affidavit/s are deposed to by Messrs. Movsovich or Mr Rajan. Moreover, no confirmatory affidavit is deposed to any director and/of authorized office bearer of MVC.

35. For the above reasons, the Minister takes issue with the founding affidavit deposed to by Mr Ganey. Absent the confirmatory affidavits and/or confirmation of the content of Mr Ganey's submissions, the content of the founding affidavit falls to be regarded as hearsay.

36. Furthermore, there is no resolution of the MVC in support of the application.

37. Accordingly, the application falls to dismissed with costs for this ground alone.

#### **RELIEF SOUGHT BY MVC IS INCOMPETENT AND UNCONSTITUTIONAL**

38. The MVC, *inter alia*, seeks a relief<sup>2</sup> which in essence is geared towards interfering in the legislative and regulatory process currently undertaken by the National Assembly and President.

39. Furthermore, MVC requires this Court to usurp the statutory functions of the President and issue an order to revive the repealed provisions of regulations 7 and 9 in respect of the upper limit of R15 million and disclosure threshold of R100

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<sup>2</sup> Notice of Motion, prayer 2.1

000. This Court has no power to revive the repealed provisions and does even have the power to revive a lapsed court order. The legislature has in its wisdom removed the upper limit and disclosure threshold and gave that power to the President to determine these amounts on the basis of guidelines provided in the amendment regulations.

40. Furthermore, such an order would be unconstitutional in that this Court is required to issue an extraordinary order that would constitute the most serious violation of the sacrosanct principle of separation of powers

#### **RESPONSE TO THE FOUNDING AFFIDAVIT**

41. **Paragraphs 1 to 3**

The Minister refers to its third point *in limine* and repeats the reasons set out therein. It accordingly challenges the extent of the deponent's personal knowledge and the veracity of the founding affidavit.

41. **Paragraphs 4 to 6.3**

The contents hereof are noted

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**42. Paragraphs 7 to 7.2**

**42.1** The Minister admits the content of these paragraphs insofar as it correctly records the constitutional provisions referred to.

**42.2** However, for the reasons advanced herein, the Minister denies that any reasons existed for MVC to approach this Court for the relief that it seeks.

**42.3** The relief sought by MVC is rendered nugatory given the prescripts of section 11 of the Interpretation Act, read with section 27 (5) of EMAA, and therefore there is no basis for the relief sought.

**43. Paragraph 8**

**43.1** The contents hereof are denied.

**43.2** MVC misinterprets the ambit and its reliance on section 172 of the Constitution. The section reads as follows:

*"172. Powers of courts in constitutional matters*

*1. When deciding a constitutional matter within its power, a court*

*a. must declare that any law or conduct that is inconsistent with the Constitution is invalid to the extent of its inconsistency; and*

**b. may make any order that is just and equitable, including**

**i. an order limiting the retrospective effect of the declaration of invalidity; and**

**ii. an order suspending the declaration of invalidity for any period and on any conditions, to allow the competent authority to correct the defect.**

**2. a. The Supreme Court of Appeal, the High Court of South Africa or a court of similar status may make an order concerning the constitutional validity of an Act of Parliament, a provincial Act or any conduct of the President, but an order of constitutional invalidity has no force unless it is confirmed by the Constitutional Court.**

**b. A court which makes an order of constitutional invalidity may grant a temporary interdict or other temporary relief to a party, or may adjourn the proceedings, pending a decision of the Constitutional Court on the validity of that Act or conduct.**

**c. National legislation must provide for the referral of an order of constitutional invalidity to the Constitutional Court.**

**d. Any person or organ of state with a sufficient interest may appeal, or apply, directly to the Constitutional Court to confirm or vary an order of constitutional invalidity by a court in terms of this subsection (Underlining supplied).**

**43.3 Section 172, therefore, has a double pronged requirement, namely, that the court declare certain legislation or conduct inconsistent with the Constitution and, thereupon, make an order that is just and equitable including unconstitutional and, thereupon, to make an order (i) limiting the retrospective effect of its declaration or (ii) suspending the operation of it**

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declaration for a period to allow the competent authority to remedy the defect.

43.4 The MVC does not seek the declaration of unconstitutionality of the PFFA or EMAA. It cannot do so in any event, as any such challenge is subject to proceedings which are already before this Court under case number 7630/2023. Furthermore, I have already outlined the principle of separation of powers and the legal impediment of reviving the repealed provisions.

43.4 Therefore, MVC's reliance on section 172 of the Constitution is misplaced.

**44. Paragraphs 9 to 13**

The contents of these paragraphs are admitted insofar as they relate to the official capacities of the state respondents as cited.

45. I further also refer to what has been stated above regarding the truncated service on the state respondents.

**46. Paragraphs 14 to 17**

The contents of these paragraphs are noted.

**47. Paragraphs 18 to 21**

**47.1** The content of these paragraphs is admitted insofar as it relates to the statutory provisions and the amendments effected to regulations 7 and 9 of schedule 2 of the PPFA following upon the enactment of the EMAA. Any other allegations are denied. I must add that a resolution by the National Assembly is provided for section 24 of the PPFA.

**47.2** Any such promulgation of these regulations by the President would be made by the President after the resolution of the National Assembly. The President exercises the discretion based on clear guidelines provided for in the amended regulations. Such a discretion would be exercised properly and lawfully.

**47.3** Furthermore, I am informed that the National Assembly will sit on Thursday, 16 May 2024 to consider and pass the resolution. Thus, besides the fact that MVC seeks to use the Court to interfere in the parliamentary processes, it may very well be that the National Assembly had passed a resolution by the time of the hearing of this matter.

**48. Paragraph 22**

**48.1** The allegations contained in this paragraph are denied.

**48.2 Regulations 7 and 9, prior to the enactment of the EMAA remain enforce until the promulgation of the new regulations by the President. This interpretation accords with section 11 of the Interpretation Act, read with section 27 (5) of EMAA.**

**48.3 MVC is reminded of the Constitutional Court judgment in *My Vote Count II* to the effect that any order seeking to dictate to the legislature and/or the executive of how to conduct themselves in the legislative process, is impermissible and infringes on the separation of powers. In any event, this Court is not seized with the issue of constitutionality. That issue is already before a court in due course in the matter under case number 7630/2023.**

**49. Paragraph 23**

**The Minister bears no knowledge of these communications and defers to the Presidency to address this in its papers.**

**50. Paragraph 24**

**The issues of unconstitutionality are clearly misplaced and borders on being frivolous to say the least.**



**51. Paragraphs 25 and 26**

These paragraphs are admitted.

**52. Paragraph 27**

**52.1 The Minister accepts that submissions were made by MVC to the select committee.**

**52.2 The said submissions were considered and in event, they are incorrect. First, when the President embarks on a legislative and regulatory process, he does not do so as a *"political actor or head of a political party"*. He acts in that capacity as the head of government clothes with constitutional and legislative powers. His role cannot be seen through the lens of a political party. Second, the so-called *"apprehension of personal and institutional bias"* only exists in the mind of MVC.**

**53. Paragraphs 28 to 33**

**53.1 The Minister and I bear no knowledge of these communications and/or interactions and accordingly defers to the Presidency and/or the Office of the Acting Speaking to address these issues.**



53.2 I have however read annexure "FA6", I could not find the allegation that the Presidency "*expressly requested the applicant not to approach the court*". The rather states (in particular context) that the "*Presidency therefore submits that any litigation would at this stage be premature and unnecessary*".

54. **Paragraph 34**

"FA9" is, in fact, the Proclamation of the President enacting the EMAA and not a media statement as referred to.

55. **Paragraph 35**

Save to deny that any *lacuna* exists, the Minister and I bear no knowledge of the remaining allegations relating to the communications with the Presidency. Accordingly, it defers to the Presidency to address these allegations in its papers.

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**56. Paragraphs 36 and 37**

I reiterate that there is no *lacuna* in the law as alleged by MVC. For the remainder of these paragraphs, I defer to the Office of the Acting Speaker to address in his papers. However, the draft resolution was not discussed by the National Assembly. It is only having its sitting today on Thursday, 16 May 2024.

**57. Paragraph 38**

57.1 The contents of this paragraph are denied.

57.2 The essence of the relief sought by MVC infringes on powers vested in Parliament to pass a resolution and the President to promulgate regulations in accordance with such legislation. It is clearly untenable to seek such relief from this Court under the guise of an interim interdict.

**58. Paragraphs 39 to 42**

58.1 I have exhaustively addressed the fact that no *lacuna* exists, and I refer this Court to what has previously stated in this regard.

58.2 Furthermore, there is no constitutional challenge which the MVC seeks in these urgent proceedings. The constitutional challenge is to be addressed in the opposed application under case number 7630/2023.

58.3 MVC's suggestions of impropriety on the part of political parties and donors are speculative at best. This Court should not be approached on the mere whim and speculation of the MVC on scant evidence and then seeking far-reaching relief on matters of national importance. Such conduct should be dissuaded in the strongest of terms. MVC has not provided any shred of evidence regarding the alleged undue conduct by political parties and donors whether in the past or now. It is improper for MVC to impugn the integrity of political parties and donors in this way.

59. **Paragraph 42**

59.1 These allegations are denied as, once again, being speculative in nature.

59.2 The elections are scheduled to take place in about two weeks from the date of this affidavit being deposed to. The nature of election campaigning and funding would entail that any election donations, be they large or small would have been made far in advance of the enactment of the EMAA. In any event, I reiterate that there is simply no *lacuna* as alleged by MVC.



K.T.

**60. Paragraphs 43 and 44**

60.1 These allegations are denied. I reiterate what has previously been said regarding the application and remedy provided for by section 172 (1) of the Constitution. MVC is misguided in its insistence that this Court can act in terms of section 172 when no constitutional challenge to any act or conduct is sought as part of the relief in this application.

60.2 The essence of the relief sought by MVC also infringes on powers vested in Parliament to adopt a resolution and the President to promulgate regulations in accordance with the amendment legislation.

60.3 On its own version, MVC admits that Parliament is scheduled to resume its adjourned sitting where the only item on the Order Paper is to consider and to pass a resolution for the President to proclaim the regulations. Thus, the relief now being sought by MVC is an impermissible attempt to pre-empt the sitting of Parliament where a resolution is to be passed.

**61. Paragraphs 45 to 49**

61.1 I deny that this application was urgent, and I refer this Court to the reasons advanced for lack of urgency.



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61.2 Furthermore, MVC premises its urgency on an alleged *lacuna* as well as the speculative suggestions of untrammelled donations being made for nefarious reasons. These allegations are simply incorrect, for the reasons previously advanced herein. As such, the approach for relief to Court is legally incompetent and more so, on the grounds of extreme urgency with which the MVC launched these proceedings.

61.3 For the above reasons, any inkling of urgency falls away completely.

### CONCLUSION

62. In view of the foregoing and especially the lack of any merit in the application brought by the MVC, the Minister prays that the application be dismissed with costs, including the costs of two counsel where so employed. MVC cannot enjoy the protection of **Blowatch** principle as the application has nothing to do with a constitutional challenge and has no merit whatsoever.



LIVHUWANI TOMMY MAKHODE

I certify that the above mentioned signature is the true signature of the Deponent and that: he acknowledged to me that he knows and understands the contents of the foregoing Affidavit, which Affidavit was signed and attested to at the under mentioned address of

this the 16<sup>th</sup> day of **MAY 2024**, in accordance with the provisions of Regulation R1258 dated 27 July 1971, as amended by Regulation R1648 dated 19 August 1977, and as further amended by regulation R1428 dated 11 July 1980.



**COMMISSIONER OF OATHS**

**RAMAKWYA AENEEO MOLEKANE  
COMMISSIONER OF OATHS  
PRACTISING ATTORNEY (RSA)  
SUITE 0008, GROUND FLOOR  
PROTEA TOWERS  
248 PAUL KRUGER STREET  
PRETORIA**

*h.T.*

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**MINISTER OF HOME AFFAIRS**

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**ACTING SPEAKER OF THE NATIONAL ASSEMBLY**

Fourth Respondent

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**CONFIRMATORY AFFIDAVIT**

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I, the undersigned

**DR AARON PAKISHE MOTSOLEDI**

  
h.T.

do hereby make oath and state that:

1. I am the Minister of Home Affairs appointed as such by the President of the Republic of South Africa on 30 May 2019. Since 1994, I held various political positions as a Member of the Executive Council ("MEC") in the Limpopo Province and I also served as Minister of Health for ten years (2009-2019). The current work address is at 909 Arcadia Street, Hatfield, Pretoria. I am cited as the third respondent in this matter.
2. I confirm having read the answering affidavit of the Director-General, **LIVHUWANI TOMMY MAKHODE** who is duly authorized by an executive authority to depose to the answering affidavit on my behalf in this matter.
3. I further confirm the correctness of the answering affidavit insofar as it relates to me, the Department of Home Affairs and its officials and all steps taken in furtherance of any official duties. I wish to add that I have been actively involved in the legislative process leading to the enactment of the Electoral Matters Amendment Act 14 of 2024.

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**DR AARON PAKISHE MOTSOLEDI**

I certify that the above mentioned signature is the true signature of the Deponent and that: he acknowledged to me that he knows and understands the contents of the foregoing Affidavit, which Affidavit was signed and attested to at the under mentioned address of this the \_\_\_\_\_ day of **MAY 2024**, in accordance with the provisions of Regulation R1258

dated 27 July 1971, as amended by Regulation R1648 dated 19 August 1977, and as further amended by regulation R1428 dated 11 July 1980.

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**COMMISSIONER OF OATHS**

*[Handwritten signature]*  
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