
AFFIDAVIT

I, the undersigned, ROLAND ATHOL PRICE TROLLIP, do hereby make oath and state:

1. I am a municipal councillor in the Nelson Mandela Bay Metropolitan Municipality and I am resident in Port Elizabeth.
2. The facts herein deposed to are within my direct knowledge unless it appears from the context or is stated to the contrary and are to the best of my knowledge true and correct.
3. I was the former Executive Mayor within the aforesaid council between the period August 2016 to 27th of August 2018.
4. During the aforesaid period an extended investigation into fraud and corruption within the Integrated Public Transport System (IPTS) project was ongoing. Said investigation was launched by the now suspended city manager, Mr Johann Mettler, with assistance from National Treasury.

5. During this time the administration worked very closely with law enforcement agencies so as to ensure that all information relating to fraudulent and/or suspicious activities or transactions within the IPTS project was readily available so that no investigation would be obstructed.
6. It has now come to my attention through various media reports that the current Executive Mayor of Nelson Mandela Bay, Cllr Mongameli Bobani, has been implicated in alleged fraud and/or corruption within the IPTS project as he allegedly solicited and/or received funding and/or unlawfully benefitted from public funds.
7. Cllr Bobani has recently been responsible for initiating disciplinary action against City Manager, Johann Mettler. Said disciplinary action has seen Mettler being placed on cautionary suspension as from September 2018 already. It is my believe that this move by Cllr Bobani was motivated by the fact that Mettler was the driving force behind the investigation into the alleged corruption and/or fraud within the IPTS project in Nelson Mandela Bay.

8. I therefore wish to institute criminal charges against Cllr Mongameli Bobani in respect of the Prevention and Combatting of Corrupt Activities Act, 2004.
9. Furthermore, various media reports have also brought to light the fact that Mr Zandisile Qupe, former ANC regional secretary, has also been implicated in alleged fraud and/or corruption within the IPTS project as he allegedly solicited and/or received funding and/or unlawfully benefitted from public funds.
10. I therefore also wish to institute criminal charges against Mr Zandisile Qupe in respect of the Prevention and Combatting of Corrupt Activities Act, 2004.
11. In reference to the Prevention and Combatting of Corrupt Activities Act, 2004 I specifically refer you to Section 3 of said act which reads as follows-

Any person who, directly or indirectly-

(a) accepts or agrees or offers to accept any gratification from any other person, whether for the benefit of himself or herself or for the benefit of another person;

in order to act, personally or by influencing another person so to act, in a manner -

(ii) that amounts to-

(aa) the abuse of a position of authority;

(bb) a breach of trust; or

(cc) the violation of a legal duty or a set of rules;

is guilty of the offence of corruption

ROLAND ATHOL PRICE TROLLIP

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 on this 13th day of March 2019 at Port Elizabeth. In administering the oath, the requirements of Regulation R2477 dated 16 November 1984, as amended, have been complied with.

COMMISSIONER OF OATHS