

COPY

**IN THE EQUALITY COURT OF SOUTH AFRICA
SITTING ALSO AS THE HIGH COURT OF SOUTH AFRICA
(GAUTENG LOCAL DIVISION, JOHANNESBURG)**

CASE NO. EQ2/18

In the matter between:

NELSON MANDELA FOUNDATION TRUST

Applicant

and

AFRIFORUM NPC

First Respondent

ERNST ALEX ROETS

Second Respondent

In re:

NELSON MANDELA FOUNDATION TRUST

First Applicant

SOUTH AFRICAN HUMAN RIGHTS COMMISSION

Second Applicant

and

AFRIFORUM NPC

First Respondent

**MINISTER OF JUSTICE AND
CORRECTIONAL SERVICES**

Second Respondent

**DEPARTMENT OF JUSTICE AND
CORRECTIONAL SERVICES**

Third Respondent

with

JOHANNESBURG PRIDE NPC

First Amicus Curiae

**FEDERASIE VAN AFRIKAANSE
KULTUURVERENIGINGE NPC**

Second Amicus Curiae

2019-09-23
JOHANNESBURG 2000
ISSUING OFFICE
REGISTRAR OF THE HIGH COURT

NOTICE OF MOTION: CONTEMPT OF COURT

TAKE NOTICE that the applicant intends to apply to the above Honourable Court on ~~MONDAY 26 AUGUST 2019~~ *TUESDAY 3 SEPTEMBER 2019*

~~MONDAY 26 AUGUST 2019~~ at 10h00, or so soon thereafter as counsel may be heard, for an order in the following terms:

1. This application is heard as one of urgency in accordance with Rule 6(12), the requirements of the Rules of Court in respect of notice, service and time periods being dispensed with and the applicant's departure therefrom being condoned;
2. A rule nisi is issued requiring the first respondent and the second respondent to show cause, on a date to be determined by this Court, why an order should not be made on a final basis --
 - 2.1. declaring that the first respondent, **AFRIFORUM NPC**, and the second respondent, **ERNST ALEX ROETS**, are in contempt of paragraph (2) of this Court's order dated 21 August 2019 under Case No EQ2/2018;
 - 2.2. imposing a fine, such as is deemed appropriate by this Court, on the first and second respondents, jointly and severally;
 - 2.3. imposing a period of imprisonment, such as is deemed appropriate by this Court, on the second respondent, **ERNST ALEX ROETS**, suspended on conditions deemed appropriate by this Court;
 - 2.4. directing the first and second respondents to bear the costs of this application, jointly and severally, on the attorney and own client scale.

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

TAKE NOTICE FURTHER that the applicant has appointed **RUPERT CANDY ATTORNEYS INC** as its attorneys of record, at whose addresses (including the email address), set out hereunder, the applicant will accept service of all documents in this application.

TAKE NOTICE FURTHER that, if you intend to oppose this application:

- (a) you must, by **TUESDAY 27 AUGUST 2019**, deliver notice of such intention (and appoint an address within fifteen kilometres of the office of the Registrar at which you will accept notice and service of all documents in this matter), as well as your answering affidavit(s), if any; and
- (b) the applicant shall then, by **12h00** on **THURSDAY 29 AUGUST 2019**, deliver its replying affidavit(s) and present the indexed and paginated file to the Registrar.

SIGNED at Johannesburg on 23 August 2019



RUPERT CANDY ATTORNEYS INC
Applicant's Attorneys
Block 4, Rivonia Office Park
150 Rivonia Road, Sandton
Tel: 010 035 0867
Email: rupert@rupercandy.co.za
Ref: R Candy/N0001

TO:

THE REGISTRAR
of the above Honourable Court

AND TO:

HURTER SPIES INC.

First Respondent's attorneys

C/O NELSON BORNMAN & PARTNERS

3rd Floor, 288 on Kent

Cnr Kent and Harley Street

Ferndale

Randburg

Tel: 012 941 9239

Fax: 012 644 1997

E-mail: deloff@hunterspies.co.za

Ref: DJ Eloff/MAT 1976

*Service by e-mail BY AGREEMENT
between the legal representatives*

MR ERNST ALEX ROETS

Second Respondent

c/o **AFRIFORUM NPC**

58 Union Ave,

Kloofsig, Centurion,

Tel: 086 10 200 30

E-mail: ernst@afirforum.co.za

*Service by e-mail BY AGREEMENT
between the legal representatives*

**IN THE EQUALITY COURT OF SOUTH AFRICA
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In re:

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**MINISTER OF JUSTICE AND
CORRECTIONAL SERVICES** **Second Respondent**

**DEPARTMENT OF JUSTICE AND
CORRECTIONAL SERVICES** **Third Respondent**

with

JOHANNESBURG PRIDE NPC **First Amicus Curiae**

**FEDERASIE VAN AFRIKAANSE
KULTUURVERENIGINGE NPC** **Second Amicus Curiae**

SUPPORTING AFFIDAVIT


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I, the undersigned,

SELLO HATANG

hereby state under oath as follows:

INTRODUCTION

1. I am an adult male, employed by the applicant as its Chief Executive Officer, at 107 Central Street, Houghton, Johannesburg.
2. I deposed to the applicant's founding affidavit in the main application under this case number ("**main application**"), and I am likewise duly authorised to depose to the present affidavit on behalf of the applicant.
3. Unless otherwise indicated, the facts in this affidavit fall within my personal knowledge and, to the best of my belief, are true and correct. The limited legal submissions I make are based on the advice of the applicant's legal representatives, which I believe to be correct.

SYNOPSIS

4. This is an urgent application for a rule nisi, requiring the respondents to show cause why they should not be declared in contempt of court, and sanctioned accordingly.

PARTIES

5. The applicant is the Nelson Mandela Foundation Trust ("**the applicant**"), an inter vivos trust registered with the Master of the High Court of South Africa under

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registration number IT 9259/99, with its principal place of operations situated at 107 Central Street, Houghton, Johannesburg.

6. The Foundation was established by former President Nelson Rolihlahla Mandela in 1999, shortly after he retired from public office. Its vision is *"a society that remembers its past, listens to all its voices, and pursues social justice"*. Its mission is *"to contribute to the making of a just society by promoting the legacy of Nelson Mandela, providing an integrated public information resource on his life and times, and convening dialogue around critical social issues"*.
7. The first respondent is AfriForum NPC (*"AfriForum"*), a non-profit company duly incorporated under the registration number 2005/042861/08, with its principal place of operations situated at the corner of DF Malan Drive and Union Avenue, Kloofsig, Centurion.
8. According to its website, AfriForum is a non-governmental organisation whose vision is *"that Afrikaners – who have no other home – are able to lead a meaningful and sustainable existence, in peace with other communities, here on the southernmost tip of Africa"*. Its stated mission is as follows:

AfriForum works to ensure that the basic prerequisites for the existence of Afrikaners are met, by acting as a credible Afrikaner interest organisation and civil rights watchdog - as part of the Solidarity Movement - outside the workplace on national and local level to handle the impact of the current political realities facing Afrikaners, and to influence those realities, while working simultaneously to establish sustainable structures through which Afrikaners are able to ensure their own future.

9. The second respondent is Ernst Alex Roets (*"Mr Roets"*), an adult male attorney, at all relevant times employed as AfriForum's Deputy Chief Executive Officer and



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"Head of Policy and Action". Mr Roets deposed to AfriForum's opposing affidavit in the main application.

10. This applicant will be served on AfriForum through its attorneys of record in the main application, Hurter Spies Inc, by hand and by email, as well as on Mr Roets, by email at ernst.roets@afriforum.co.za, and by hand at his place of work: corner of DF Malan Drive and Union Avenue, Kloofsig, Centurion.

BACKGROUND

11. On 21 August 2019, around 12h00, this Honourable Court, per the Honourable Deputy Judge President Mojapelo, made the following order ("the Order"):

(1) *In terms of section 21(1) of the Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000 ("the Equality Act"), it is determined that the display of the old national flag of South Africa, introduced from 31 May 1928, and used throughout apartheid until it was abolished on 27 April 1994 ("the Old Flag"), at the 'Black Monday' demonstrations on 30 October 2017 constituted:*

- a. *hate speech, in terms of section 10(1) of the Equality Act;*
- b. *unfair discrimination on the basis of race, in terms of section 7 of the Equality Act;*
- c. *harassment in terms of section 11 of the Equality Act.*

(2) *In terms of section 21(2) of the Equality Act, it is declared that subject to the proviso in section 12 of the Equality Act, any display of the Old Flag constitutes:*

- a. *hate speech in terms of section 10(1) of the Equality Act;*
- b. *unfair discrimination on the basis of race, in terms of section 7 of the Equality Act;*
- c. *harassment in terms of section 11 of the Equality Act.*

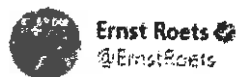
12. The Honourable Mojapelo DJP read the Judgment and Order out in full, in open court, in the presence of both myself and Mr Roets, among many other people and the media (including media that live broadcast the reading of the Judgment).



13. Outside Court, minutes later, I stood next to Mr Roets in front of the media and extended an olive branch to AfriForum. I told the media inter alia that: *"We are hoping to join hands with AfriForum... to say our woundedness should not wound the future. We should not be poisoning the future through the gratuitous display of the Old Flag."*

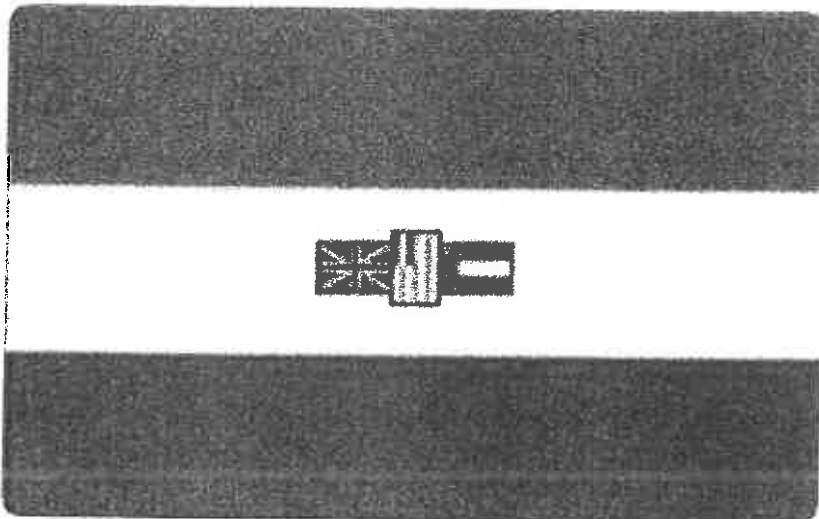
CONTEMPT

14. Only hours after the Judgment was handed down, at approximately 19h50 on 21 August 2019, Mr Roets published a Tweet on his Twitter account (@ErnstRoets), displaying the image of the Old Flag under the comment *"Did I just commit hate speech?"* ("the First Tweet"). A true copy of the First Tweet is pasted below:



Ernst Roets
@ErnstRoets

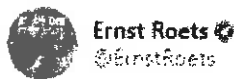
Did I just commit hate speech?



7:50 PM - Aug 21, 2019 - Twitter for iPhone

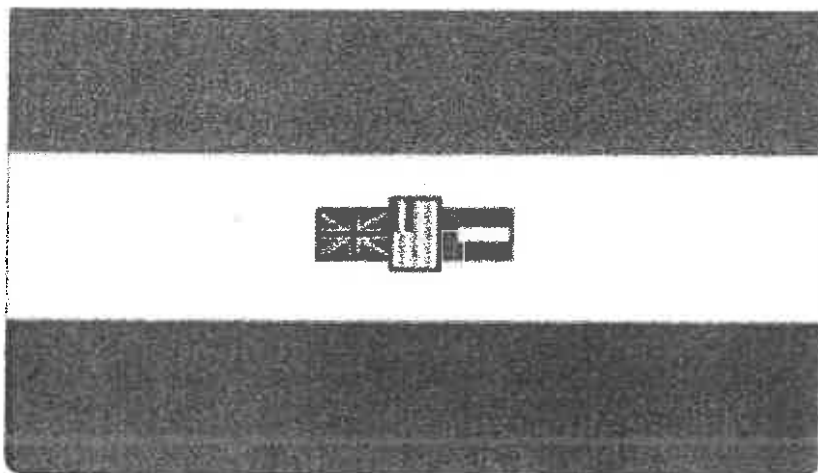
Ver
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15. The following day, 22 August 2019, at approximately 09h13, Mr Roets published a second tweet ("the Second Tweet") containing the First Tweet (with the image of the Old Flag), under the comment: *"The reaction to this tweet is as expected. The judgment said the flag may be used for academic purposes. I am a scholar of Constitutional Law, currently doing my doctorate. This is an academic question. It seems the NMF's quest for apartheid style censorship & banning continues."* A true copy of the Second Tweet is pasted below:



The reaction to this tweet is as expected. The judgment said the flag may be used for academic purposes. I am a scholar of Constitutional Law, currently doing my doctorate. This is an academic question. It seems the NMF's quest for apartheid style censorship & banning continues.

Ernst Roets @ErnstRoets · 15h
Did I just commit hate speech?



9:13 AM Aug 22 2019 Twitter Web App

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16. When publishing the First Tweet and the Second Tweet (“the Tweets”), Mr Roets was plainly acting both in his personal capacity and as a representative of and spokesperson for AfriForum. Indeed, he never indicated that he was not acting in such capacities, and AfriForum has never distanced itself from the Tweets.
17. By the time of preparing this affidavit –
- 17.1. Mr Roets’ Twitter account had over 49,200 “followers” (subscribers);
- 17.2. the First Tweet had received “likes” (endorsements) from 862 Twitter users and had been “retweeted” (republished) by 345 Twitter users;
- 17.3. the Second Tweet had received “likes” from 210 Twitter users and had been “retweeted” by 56 Twitter users.
- 17.4. The tweet had been repeated on the websites of News24 and IOL, which have a wide distribution in South Africa and internationally.
18. It is impossible to know how many people have been (and will still be) exposed to the Tweets, and the gratuitous displays of the Old Flag that they contain. It is clear, however, that the Tweets have already caused considerable hurt to many South Africans and considerable harm to national unity. Pasted below is a small sample of reactions to the First Tweet by Twitter users:



Faatimah Shandu Mohamed @faatimah_Moh 5h

Replying to @ErnstRoets

@MYANC You failed us!!

It hurts to see our oppressors offsprings free to post symbols and say things that remind us of a regime that took away our dignity and killed many of our people. They display it to our faces each day and we are made to accept it for “rainbow nation”

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Sharon Peetz @SharonPeetz · 4h

Replying to @ErnstRoets

For me .. yes you did!!! The question is why?? Why would you want to hurt people who suffered atrocities under this flag? Did this make you feel happy???



Linda Manamela @MmakgoshiLinda · 6h

Replying to @ErnstRoets

Yes, what do you think? This apartheid flag of yours, is full of black people's blood. It stinks blood. Remember millions of blacks who died during the apartheid regime, do you feel proud of that? If you still have a nerve to lift that flag higher, it clearly shows how behind you are.



Tony Walnuts @Kreative_Konsep · 4h

Replying to @ErnstRoets and @Julius_S_Malema

This clearly shows that this country is very far from healing. Our "rainbow nation" guise is a sham. It's people like @ErnstRoets who feel like they can do whatever they want and get away with it. Racism still exists and will never end until our leaders take a stand.



Nick Khoza @khozagn1 · 4h

Replying to @ErnstRoets

Not only that, provocative as well, but you know what keep going, you are not worth our attention. You're just a disgruntled little afrikaner boy, interimly enjoying white privileges soon to be cut by the unity of purpose of the black power



Jean @JeanFPretorius · 17h

Replying to @ErnstRoets

man.... you can disagree with government infringing on non violent expression/ speech without resorting to deliberately arousing pain in others!! Delete this shit!



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19. Later that day, during the afternoon of Thursday 22 August 2019, Mr Roets was interviewed on Radio 702, in the course of which sought to justify his Tweets inter alia in the following respects:

- 19.1. Mr Roets repeated his claim that he published the Tweet as an academic, pursuing a doctorate in constitutional law.
- 19.2. Mr Roets stated: *"AfriForum will decide whether we will appeal the ruling. The fact of the matter is courts can be wrong."*
- 19.3. When asked by the interviewer whether he was *"trying to disrespect this court ruling"*, Mr Roets stated: *"Well, that's a very legal positivistic argument – to say, because the law says so it has to be right – we must remember that Nelson Mandela was illegal according to the laws of the time, that the apartheid system was legal according to the laws of the time and according to the courts of the time. So we shouldn't simply say, because the court says so therefore it's the right thing to do."*
- 19.4. *"You seem to suggest that courts are always right. Courts are not always right. Courts are judged by humans, judges are also human, judges can also be wrong. And yes, we do respect the rule of law, we believe the rule of law should be respected, but some of the greatest – not some of the greatest – the greatest – atrocities of the last century were all committed with government consent and with the consent of the courts."*
- 19.5. Mr Roets was completely unmoved, unsympathetic and unrepentant when a black caller broke down into tears and pleaded with him not to display the Old Flag, saying to Mr Roets *"I still, when I look at [the Old Flag], still feel pain for the fact that my parents went through the pain of the apartheid government, and now you want to say it's an academic thing for some black South African – it's a painful thing, Ernst, it's a painful thing that you are doing for us as black South Africans, and you've got to start appreciating*

that black South Africans went through pain... So Ernst, I ask you, as a young black South African, please – please – please, stop posting the flag, it is painful for us as black South Africans, I don't care how academic it is – it is painful for us."

20. The unmistakable intent and effect of the Tweets was to mock and provoke all those South Africans – black and white – who were celebrating the Judgment, and felt vindicated and protected by the Judgment. Mr Roets even inadvertently admits as much, by saying, in the Second Tweet, that the public reaction to the First Tweet was "*as expected*".
21. Mr Roets claimed, in the Second Tweet and on Radio 702, that his display of the Old Flag should not fall foul of the Judgment and the Order because it was "*for academic purposes*". He is alluding to the proviso in section 12 of the Equality Act, which states that "*bona fide engagement in artistic creativity, academic and scientific inquiry, fair and accurate reporting in the public interest or publication of any information, advertisement or notice in accordance with section 16 of the Constitution, is not precluded*".
22. But the Tweets clearly cannot enjoy the protection of the proviso, for at least the following reasons:
 - 22.1. First, despite Mr Roets' claims, they are plainly not academic works. They were not presented on an academic platform nor addressed to an academic audience. Rather, they were, deliberately, published on a lay platform to a lay audience, consisting of ordinary South Africans.

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- 22.2. Second, if the respondents genuinely wished to critique the Judgment in a spirit of academic inquiry, they could easily have done so without including the image of the Old Flag. Such inclusion was gratuitous and could not add any meaning to any academic inquiry.
- 22.3. Third, conducting a cruel experiment on black people, knowingly exploiting their pain and anguish to make some or other political point, can never be regarded as a legitimate academic exercise.
- 22.4. Fourth, the publication of the Tweets was not "*bona fide*". On the contrary, it was unmistakably *mala fide*. By publishing the Tweets, the respondents openly mocked the Order, the Judgment (and the Judge personally), the applicant (and me personally), and all South Africans who welcomed the Judgment.
23. The respondents' sneering contempt – not only for this Honourable Court but for Mojapelo DJP personally – is demonstrated by their rejection of the invitation in para 202 of the Judgment:

AfriForum, which no doubt believed in the correctness of its submissions, has informed the Court that it is a reluctant opponent in these proceedings; that it has no love for the Old Flag and what it represents; that it is aware that most South Africans recoil from the Old Flag; it also says that it is committed to taking active steps to combat genuine hate speech. Now that the judgment has set out in some detail the extremely dehumanising and hurtful violations that flow from the gratuitous display even in current society, one expects AfriForum to live up to its own words, and thus help to build an inclusive South Africanness of all citizens united in their diversity based on mutual respect and genuine acknowledgment of equal dignity, despite the superficial differences in the skin colour.

24. In AfriForum's opposing affidavit in the main application, Mr Roets testified that "*AfriForum is committed to upholding the right to freedom of expression, while*

taking active steps to combat genuine hate speech" (para 4, emphasis added).

Yet, within hours of this Honourable Court declaring that displays of the Old Flag indeed constitute "genuine" hate speech, they have not taken any active steps to "combat" such displays, but have actually taken active steps to promote such displays. The respondents seem to feel that this Honourable Court (even when presided over by one of the most experienced and respected senior judges in the country) has no authority to tell them what constitutes "genuine hate speech", and that they have the supreme prerogative to decide this for themselves and for all South Africans, including black South Africans.

25. Mr Roets also testified (at para 6) that "we have no particular love for the flag or what it represents. In the exceptionally rare instance that anyone participating in one of our events brings on old flag with them, we ask them to put it away." The Tweets prove this testimony to have been a lie all along, and that the Honourable Court was too generous to them in the Judgment (para 179, emphasis added):

AfriForum is aware of the negative effect of the display of the Old Flag. It states as a fact that most people recoil from the display of the flag, but it (Afriforum) does not wish to support declaring its gratuitous display as hate speech and thus limiting it to instances reserved by the proviso in section 12. Why would they not support the curbing of its hateful, hurtful, harmful and inciteful effect towards black people (their fellow men and women)? Instead it chooses to pose as a champion of freedom of expression and chose not to engage with the hurt or reason behind the feelings of those who recoil from it.

26. We now know why. The Tweets reveal that AfriForum still – even in spite of the Judgment, with all its detail – has absolutely no interest or inclination to engage, let alone empathise, with the sincere hurt experienced by black South Africans when they are exposed to gratuitous displays of the Old Flag.

27. Finally, the Tweets also betray a profound hypocrisy on the part of the respondents. AfriForum sought, and celebrated, the judgment of this same Honourable Court in *AfriForum and Another v Malema and Others* 2011 (6) SA 240 (EqC), which concerned an African struggle song that was deemed to constitute hate speech against white Afrikaners. In that case, this Honourable Court (per Lamont J), held *inter alia* as follows (with emphasis added):

[110] It was submitted that the law might be unable to enforce its order in the form of an interdict as people are passionate about the right to sing the song and will ignore the order. They will sing the song in private or in circumstances where it is difficult or impossible to prevent its singing (e.g. where people unexpectedly and spontaneously burst into song). The answer is that such people must pursue new ideals and find a new morality. They must develop new customs and rejoice in a developing society by giving up old practices which are hurtful to members who live in that society with them. The Equality Act does not only seek to prohibit conduct. It seeks in the very prohibition to open avenues of conciliation; to confer dignity upon all members of society by assisting them to find the building blocks necessary to shape their ability to make the judgments which will regulate their future conduct. The Equality Act seeks to drive this process forward by setting the moral standard to which members of society must adhere. The wide powers the Equality Act provides enable a Court to craft its order so as to meet this difficulty. Court orders must be strictly enforced and obeyed. There is a criminal sanction for breach in the form of contempt. ...

[111] Parties to the proceedings can be directed to comply with provisions of the Equality Act. Such parties can be dealt with by way of contempt proceedings for non-compliance. Persons who are not parties to the proceedings must be dealt with by way of structuring the order so that society knows what conduct is acceptable. Persons who are aware of the line which has been drawn by the Court are as a matter of both law and ubuntu obliged to obey it. There may be no immediate criminal sanction. Their breach of the standard set by this Court will however surely result in the appropriate proceedings under the Equality Act being taken against them. Non-participants are bound by orders setting such standards. The Equality Act contemplates that they will be so bound. The orders of the Court which set the law are no different from any order of any Court which determines what the law is. The course open to a non-participant who is aggrieved is to try to persuade the Court hearing his particular matter that the order of the other Court is clearly wrong.



28. AfriForum never once complained that Lamont J's order went too far or infringed the right to freedom of expression. Quite the reverse, they had expressly asked for it, in the hope that their members would thenceforth enjoy wide prospective protection from speech that caused them pain. They expected, rightly, that black South Africans would have enough respect for the Court and their white Afrikaner compatriots, to refrain from singing the song. I am unaware of any instance of that song having been sung in protest or even critique of Lamont J's judgment.
29. But now, when all South Africans who believe in justice and the rule of law, have sought, obtained and celebrated the same type of order from the same Honourable Court, the respondents cry that such an order goes too far. They display the Old Flag in self-styled protest or critique of Mojapelo DJP's Judgment. They refuse to accord the Court and their black countrymen the same respect that they expected, and enjoyed, in response to Lamont J's judgment.
30. For all of the above reasons, it is clear that the respondents' publication of the Tweets constitutes wilful and mala fide contempt of the Judgment and Order of this Honourable Court.

URGENCY

31. I am advised that, if this Court's Rules and Practice Manual are followed to the letter, and each party delivers its documents on deadline, an opposed application can only be heard at least 71 court days after it is instituted. Even if the applicant were to take only one day to deliver all its documents at once (i.e. replying affidavit, index, and heads of argument), the application can still only be heard at least 46 court days after it is instituted.



32. Such a period of time would deny the applicant substantial redress, as the breach of the Order by the respondents would continue unimpeded. The Judgment and Order would be considered by the respondents and their followers (as well as by the wider public) to be a dead letter, a damp squib, an unenforceable farce. Their flagrant, wilful and mala fide contempt for this Court and its Order would have been rewarded rather than punished. And they would have succeeded in their strategy to make a joke out of the Judgment and this Honourable Court.
33. I am advised, in any event, that contempt proceedings are inherently urgent, as it is intolerable to the rule of law in a constitutional dispensation that court orders can be treated as optional. For every passing day that the Order is disregarded, the dignity and authority of the judiciary is demeaned, and public confidence in the judiciary is undermined.
34. In setting the timetable for this application to be heard, however, the applicant has taken abundant care to ensure that the respondents are afforded reasonable opportunities to state their case, and that the urgent Court will be seized with a case that is ripe and properly presented, in both form and substance.

COSTS

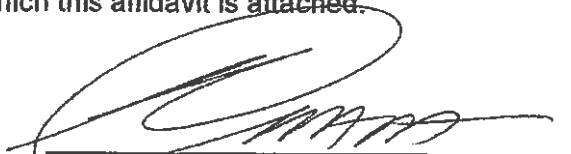
35. There is no reason for the applicant to be at all out of pocket for having to bring this contempt application.
36. Moreover, by its nature, contempt of court should attract a punitive costs order. Afriforum and Mr Roets have demonstrated utter disrespect and disregard for the authority of this Honourable Court.



37. The applicant should thus be awarded costs on the attorney and own client scale.

CONCLUSION

38. For the reasons set out above, the applicant respectfully prays for an order in terms of the notice of motion to which this affidavit is attached.



DEPONENT

The Deponent has acknowledged that he knows and understands the contents of this affidavit, which was signed and sworn to or solemnly affirmed before me at Cape Town on this the 23 day of August 2019, the regulations contained in Government Notice No R1258 of 21 July 1972, as amended, and Government Notice No R1648 of 19 August 1977, as amended, having been complied with.



COMMISSIONER OF OATHS

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