

---

**AFFIDAVIT**

---

I, the undersigned

**MANDLA MAJOLA**

hereby make affirm and state as follows.

1. I live in Gugulethu. I am the Khayelitsha District Organiser for the Treatment Action Campaign (“TAC”).
2. The facts contained herein are true and correct, are within my personal knowledge and are based on my personal experience.
3. I have been an active member of TAC since late 1999.
4. I have served as a volunteer, Western Cape Co-ordinator and National Organiser. In 2003, I was elected National Secretary of TAC, though I have since resigned from this position to concentrate on organising.
5. I have been involved in the organisation of numerous TAC events and most major marches that have taken place in the Western Cape.
6. On Saturday 16 April, I attended a meeting addressed by the Minister of Health in Site C, Khayelitsha. Copies of the pamphlet marked annexure “**ZA24**” were handed out.
7. This leaflet is false and defamatory of TAC. I am advised that most of the allegations in the leaflet have been dealt with in our papers, and therefore I will not detail the falsehoods. The leaflet is harmful and incites people.
8. The affidavit of Ralf Langner at paragraph 10 alleges about the TAC march to Parliament on 16 February that “the bussed in people from the townships seemed clueless about the intention of

the picket and that they were led like sheep by young white youths, who kept the mob together like shepherd dogs.”

9. The allegation that white youths led the marchers is false. At TAC marches, designated marshals are responsible for keeping order. By far the majority of marshals were black at the 16 February march, as with almost all TAC marches.
10. I disagree with Langner's view that people did not understand the purpose of the march. TAC members are generally well-informed about issues related to TAC and it is my view that nearly all people who came to the march did so because of their belief in the need for government to treat at least 200 000 people by the beginning of 2006.
11. It is my view that Langner's allegations and tone are racist and paternalistic. His suggestion that our members are a black mob directed by white dogs is tantamount to hate speech. He does not see poor and working class black people as independent, intelligent and moral agents.

---

**MANDLA MAJOLA**

I CERTIFY THAT THE DEPONENT ACKNOWLEDGED TO ME THAT HE KNOWS AND UNDERSTANDS THE CONTENT OF THIS DECLARATION, THAT HE HAS CONSCIENTIOUS OBJECTIONS TO TAKING THE PRESCRIBED OATH AND CONSIDERS THIS AFFIRMATION BINDING ON HIS CONSCIENCE.

THUS SIGNED AND AFFIRMED TO BEFORE ME AT CAPE TOWN ON THIS DAY OF APRIL 2005.

---

**COMMISSIONER OF OATHS**