

URA
ULRICH ROUX
AND ASSOCIATES

Our reference: UR/POS/100925

Your reference: A. Sing

10 October 2025

URGENT

A Sing and Associates Attorneys

FOR THE ATTENTION OF : A. SING

PER EMAIL : arthi@asinglaw.com

Dear Sirs

RE: OUR CLIENT – MR PAUL O’SULLVAN

1. We act for and on behalf of and Mr Paul O’Sullivan (“our client”).
2. We refer to the summons issued on or about **2020-09-15** in the Johannesburg High Court under case number 2025-164426 against Mr O’Sullivan by your client, Nhlanhla Mkhwanazi.
3. We confirm that a copy of the summons was served on our client on 2025-09-16 and that a plea is due to be filed on or before 2025-10-29.
4. Notwithstanding the aforesaid, we are instructed to inform you, as we hereby do, of the following:

Johannesburg Head Office:

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Registration Number 2018/054794/21

Directors:

Ulrich Andre Roux B.Com LLB | JP Venter LLB

Senior Associates:

Storm Roux BSocSci, LLB (Cape Town) | Clarisa Vermaak LLB | Geri Erasmus LLB | Cameron Phillips B.Com LLB

Associates:

Bradon Wolmarans LLB | Bongiwe Radebe B.Com, LLB | Christiaan Small LLB (*Cum Laude*)

Conveyancer:

Tarryn Venter B.Com LLB (*Cum Laude*)

Consultant:

Ian Small-Smith B.Proc



4.1. On the dates specified below, before our client had an opportunity to file his plea in response to the abovementioned defamation action, your client, while acting in his official capacity as the Provincial Commissioner of the South African Police Service, Kwazulu-Natal, made several false and defamatory statements about our client at the widely publicised Madlanga Commission and at a Parliamentary Ad-Hoc Committee looking into allegations of police corruption. The false and defamatory statements included the following:-

4.1.1. On 19 September 2025 (Day 3 of the Madlanga Commission) your client intentionally made a false statement about our client to the Madlanga Commission, in that:-

4.1.1.1. Your client falsely alleged that our client has committed some or other unspecified crime that he has *“picked up”* and that your client has *“registered a case”* and that *“case is being investigated in KZN”* (Kwazulu-Natal).

4.1.2. The statement is false and defamatory of our client as our client has not committed any crimes and has not been charged with the commission of any crimes.

4.1.3. On 8 October 2025, your client intentionally made several false statements about our client to the publicised Parliamentary Ad-Hoc Committee looking into allegations of police corruption, including:-

4.1.3.1. your client falsely alleging that our client could be an agent working for someone else, or perhaps another government;



4.1.3.2. your client falsely alleging that *“operations of IPID (the Independent Police Investigative Directorate) were planned, coordinated, and executed at Robert – Paul O’Sullivan’s house”* or that members of IPID were *“operating guided by Paul O’Sullivan”*;

4.1.3.3. your client falsely alleging that *“it is time this country must not sit back and be run by Mr Paul O’Sullivan”* and that our client has *“got control all over”*.

4.1.4. These statements are all false and defamatory of our client who earns his own income through a property investment portfolio and the running of various business activities, both here and overseas, which have nothing to do with your client. Our client does not run any police operations, including IPID’s operations, and he certainly does not run the country. These intentionally false allegations were unsubstantiated by any evidence whatsoever.

4.1.5. On 8 October 2025, your client intentionally made a public statement to the publicised Parliamentary Ad-Hoc Committee looking into allegations of police corruption, which was intended to incite violence against our client, as follows:-

4.1.5.1. *“But, it is time that this country must not sit back and be run by Mr. Paul O’Sullivan. And if government fails to act on it, the men and women in this country, they’re going to take it*



upon themselves to do something drastically on it”;

4.1.6. The above statement, is an intentional call to the South African public to take the law into their own hands and commit violence against our client, your client knowing that he, your client, is a public figure with a wide following of supporters, and knowing that this country has a history of members acting violently at the instance of a public figure, like your client.

4.2. The abovementioned statements were intentionally made at widely publicised events, in the presence of the media, and were further published on 9 October 2025 by several media houses, including, inter alia:-

4.2.1. SABC News: *“Mkhwanazi calls for parliamentary probe into Paul O’Sullivan”;*

4.2.2. The Cape Times: *“Mkhwanazi drops another Mchunu Bombshell”;*

4.2.3. EWN: *“Mkhwanazi urges Parliament to probe forensic investigator O’Sullivan”;* and

4.2.4. IOL: *“Mkhwanazi calls for investigation into former IPID boss Robert McBride, Paul O’Sullivan”.*

4.3. The false and defamatory statements about our client were made with the intention of harming our client’s good name and reputation and his dignity. Furthermore, your client’s intentional statement inciting violence against our client has had the intended effect, because members of the



public have made threats of violence against our client and are calling for the arrest of our client without any lawful charge, purely as a result of your client's unlawful incitement to violence.

5. As a result of the harm to the good name and reputation and the dignity of the our client, he has suffered damages in the amount of **R10,000,000.00 (ten million Rand)** including patrimonial damages due to financial losses caused to our client's businesses, our client being a businessman; and/or non-patrimonial damages due to harm to our client's reputation and injuria.
6. We are therefore instructed to demand, as we whereby do, that your client formally:-
 - 6.1. retract all such defamatory statements and allegations made against our client and that he issues a public apology to our client; and
 - 6.2. retract his statement inciting the public to commit violence against our client, including any violence committed in response to your client's false allegations, or in any violence in support of your client's name and standing with the public concerned; alternatively
 - 6.3. that he pays the sum of **R10,000,00.00 (ten million Rand)** to our client for the damages occasioned by our client,
 - 6.4. either alternative being made within **two (2) business days** of date of transmission hereof, failing which a counterclaim of **R10,000,00.00 (ten million Rand)** will be delivered against your client.
7. We reserve our client's rights.
8. Our clients will not be adhering to your client's extortive demands.

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Conveyancer:	Tarryn Venter B.Com LLB (<i>Cum Laude</i>)
Consultant:	Ian Small-Smith B.Proc



9. Any legal action which your client may embark upon will be opposed by our client, accompanied by a request for a punitive cost order against your client.

Yours faithfully

A handwritten signature in black ink, appearing to be 'Ulrich Roux', written over the printed name and company name.

ULRICH ROUX | MANAGING DIRECTOR
ULRICH ROUX & ASSOCIATES

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