

Executive Summary

Pretoria High Court Case Lustres Spotlight on Unlawful Recruitment – Genocide and War Crimes in Gaza to Terrorism related Activities of South Africans Nationals and Citizens in Israeli Defence Forces with complicity of Zionist institutions

RELEASE DATE: 24 November 2025

Glossary of Terms:

- **DIRCO** – Department of International Relations and Co-operation
- **IDF** – Israel Defence Forces
- **ICC** – International Criminal Court
- **ICJ** – International Court of Justice
- **JNF** – Jewish National Fund
- **NCACC** - National Conventional Arms Control Committee
- **OPT** – Occupied Palestinian Territories
- **(PCLU-NPAS)** - Priority Crimes Litigation Unit, National Prosecuting Authority Service
- **POCDATARA or SA Anti-Terrorism Laws** - Protection of Constitutional Democracy against Terrorism and related Activities Act
- **RFMAA** – Regulation of Foreign Military Assistance Act
- **(SAPS DPCI - Hawks)** - Directorate for Priority Crimes Investigation in South African Police Service
- **SA's ICC ACT** - Implementation of the Rome Statute of the International Criminal Court Act
- **SAZF** – South African Zionist Federation
- **TELFED** – South African Zionist Federation, Israel

Johannesburg, October 2025 – A landmark case was filed before the Gauteng Division of the High Court, Pretoria, which has revealed extensive allegations that South African nationals and citizens have been unlawfully serving in the Israeli Defence Forces (IDF), supported by South African Zionist institutions.

The voluminous bundles over 12 200 pages in law and evidence were served on the Presidency and respective Government Ministries, South African Investigative and Prosecutorial Authorities, the National Director of Public Prosecutions (NDPP), the South African Police Services and various organs of state.

The High Court application raises serious questions about the serious disconnect in enforcement of South African law, the country's constitutional obligations, and its international responsibilities.

Who are the Parties?

Applicants:

1. **Safoudien Bester a Palestinian Solidarity Activist, a trained paramedic and former first responder.**
2. **Ziyaad Ebrahim Patel, South Africa** (International Human Rights Defender, South African Attorney & Lawfare Advocate).

Respondents:

1. **National Director of Public Prosecutions (NDPP)**
2. **Priority Crimes Litigation Unit, National Prosecuting Authority Service (PCLU-NPAS)**
3. **President of the Republic of South Africa**
4. **Minister of Justice and Constitutional Development**
5. **National Commissioner of South Africa Police Service**
6. **Directorate for Priority Crimes Investigation in South African Police Service (SAPS DPCI - Hawks)**

7. **Minister of Defence and Military Veterans**
8. **Minister of International Relations and Cooperation**
9. **Minister of Home Affairs**
10. **Department of Home Affairs**

Background

This significant case stems from a series of criminal complaints filed against South African nationals/citizens who are alleged to have joined and militarily served in the IDF. The Applicants contend that such military service is **unlawful under South African law** and undermines both domestic security and South Africa's credibility as a champion of international justice.

At the heart of this particular matter is the **Regulation of Foreign Military Assistance Act (RFMAA)**, which strictly prohibits South African nationals and citizens from providing military assistance to foreign states without applying for explicit authorisation.

Both the record of evidence submitted through engagement with the specialised organs of the National Prosecuting Authority Service over the years and the **National Conventional Arms Control Committee (NCACC)**, have confirmed no such authorisations have been granted to South Africans serving in the IDF between the period 2006 emanating from Israel's war in Lebanon to its present wars and military operations in Gaza since 2023 and the broader middle east region.

The Applicant's Attorneys have included findings which include, *inter alia*:

- i) No recommendations by the National Conventional Arms Control in terms of *s 2 of the National Arms Control Act*; ¹
- ii) No decisions were/have been made by the Minister of Defence in terms of *s 4(3) 5(3) and 5(1) of the Regulation of Military Assistance Act*; ²

¹ (Act 41 of 2002, as amended)

² (Act 15 of 1998)

- iii) No Copies of extracts from the Register of Authorisations made by the Minister of Defence in terms of *s 4, 5 and 6 of the Regulation of Military Assistance Act*,³
- iv) No Copies of Quarterly Reports in terms of *s6 (2) of the Foreign Military Assistance Act*.⁴

The Applicants contend that Government silence and this disconnect by its national law enforcement authorities and organs of state is not merely an oversight but rather evinces an endemic and/or systemic problem, whereby these authorities and organs of state remain captured by pro Zionist influences.

What is exposed in the application is the stark failure by our authorities to deter crime coupled with frugal resources and weak law enforcement mechanisms to uphold the Republics law without fear, favour and prejudice.

The continuing ability for South African nationals and citizens, procured and facilitated by Zionist institutions in South Africa to render foreign unlawful military service in the IDF and/or provide mercenary activities demonstrates blatant violation of the laws of the Republic of South Africa.

Amongst the grave violation of National laws also include South Africa's ratification and Implementation of the Rome Statute of the International Criminal Court Act. The State of Israel is now considered globally an ultra-right ethnocratic State and stands accused of perpetration of egregious crimes against the people of Palestine and Gaza.

Thousands of innocent civilians and children have become afflicted in the middle east region, in the perpetration of war crimes, crimes of aggression and crimes against humanity including apartheid, torture of Palestinian prisoners, ethnic cleansing, genocide and globally sponsored fascist Israeli state terrorism.

³ (Act 15 of 1998)

These violations of proscribed crimes and the real time genocide and war crimes perpetrated in Gaza are aided and abetted by a complex network of Zionist institutions and even schools which promote Zionist ideological indoctrination. These institutions and its networks require comprehensive investigations which are actively facilitating the unlawful recruitment of young impressionable Jewish South Africans into the IDF in contravention of the **Protection of Constitutional Democracy against Terrorism and related Activities Act (POCDATARA - SA anti-terrorism laws)**.

Evidence Submitted to Authorities in previous Criminal Complaints

- The criminal case lodged by the First Applicant, Safoudien Bester in the criminal complaint against **Dean Samuel Goodson** with the South African Police Services and still awaiting a decision with prosecutorial authorities and the NDPP. Goodson is a decorated trained IDF soldier (Combat Engineers Man) earning him the grey beret in the IDF, and by his own admission was in military service of the IDF in the 2014 war in Gaza, **Operation ‘Protective Edge’, where the IDF stands accused of extensive war crimes perpetrated against the civilian population in the Gaza Strip.**
- **The South African Zionist Terrorism Corridor Probe (amongst the Complainants are the First Applicant Safoudien Bester, Media Review Network and the Palestine Solidarity Campaign – Cape Town:** Lodged in February 2022 and repeatedly supplemented. This extensive probe duly prepared and represented by **Ziyaad E Patel Attorneys** collates evidence of unlawful recruitment, financing, and participation of South Africans in the IDF; a violation of South Africa’s security laws referenced in the Executive Summary.
- **Joint List of Complaints:** In November 2023, at the request of the National Prosecuting Authority Service (PCLU-NPAS), the Second Applicant’s firm submitted a consolidated list of criminal complaints which include the extensive **Gaza Docket** that was lodged in 2008-2009, emanating from Israel’s war in Gaza, “Cast Lead” where the IDF stand accused of war crimes. The Joint List of Complaints was lodged in

collaboration with **Yousha Tayob Attorneys**, detailing breaches of the **RFMAA** and South Africa's ratification of the Rome Statute (SA's ICC ACT).

- **Expanded Scope of SA Zionist Terrorism Corridor Probe:** By July 2024, the Probe had been broadened to explicitly include the crime of **genocide**, aligned with South Africa's referral to the International Court of Justice (**ICJ**) which invoked the Genocide Convention for the protection in part or whole of a civilian Population in the Gaza Strip enduring genocide since the start of the October 2023 war in Gaza. It is important to note that the Second Applicant has previously also referenced incremental genocide and acts of genocide being perpetrated by the IDF on Gaza's civilian population and the historical belligerent occupation of the West Bank and Palestinian territories on previous probes lodged with the authorities.
- **Referral to the International Criminal Court in the extended scope:** Reference is also made to South Africa's referral in November 2023 to the ICC of egregious crimes including war crimes and crimes of aggression perpetrated by the State of Israel through the IDF in a comprehensive dossier lodged with the UN Secretary General on 27 February 2025.
- The broader Probe also linked unlawful military service with wider international crimes being perpetrated by the IDF in Gaza and in the middle east region, maintaining Israel's *status quo* of belligerent occupation, apartheid practices and settler colonial imposition. This would be including war crimes by unlawful expansion of Israeli settlements and crimes against humanity being perpetrated in the occupied West Bank. The comprehensive Report **Human Rights Watch "A threshold Crossed – Israeli Authorities and crimes of apartheid and persecution"**, is also evidenced in the application.

The Applicants submit that these Probes go beyond merely just *prima facie* evidence but are supported by comprehensive and incontrovertible evidence which have been previously lodged with South African Authorities. At the heart of this damning evidence are South African nationals and citizens and Israeli accused suspects serving in the IDF, Israeli Knesset /

executive members, who are political actors, agents and instruments of aggression in the present genocide in occupied Palestine.

The Alleged Role of Locally based Zionist Institutions

Beyond individual participation, the case points to **South African based Zionist organisations** which allegedly aid and abet these activities of unlawful recruitment. According to the Applicants, such organisations assist in **recruiting South African nationals** and facilitate their departure and re-entry through South Africa's borders and ports of entry.

The Applicants contend that this exposes the **permeability of South Africa's borders**, creating **serious security risks**, and compromises the country's sovereignty by allowing its nationals and citizens to take part in foreign conflicts without state oversight.

Furthermore, the *Prevention of Organised Crime Act* further stipulates the States responsibility for law enforcement authorities in this instance to prevent offences in terms of SA's anti-terrorism laws, whereby Zionist Israeli institutions such as the Jewish National Fund ('JNF') are alleged to be involved and complicit in illicit schemes of funding and money laundering, which dispossess Palestinian families from their land and homes in the occupied West Bank neighbourhoods through the 'Palestinian absenteeism laws'.

Expansion of unlawful settlements in the West Bank constitute a war crime. The vigorous policies of ethnically cleansing in the West Bank by the Israeli State or even such JNF funding of the Israeli military / IDF makes them accessory or co-perpetrator. This also extends to the war in Gaza where there are war crimes and genocide being perpetrated. The JNF's support of settler colonial apartheid practices and the IDF's belligerent occupation in the West Bank thereto also constitutes crimes against humanity.

Prevention is also necessary regarding the Keren Kayemeth LeIsrael Jewish National Fund, (KKL-JNF) programme which money launders unlawful occupation to Jewish settler occupiers. The participants' financial role in organised crime obligates South African Authorities to prevent, deter and punitively sanction such acts according to the laws of the Republic.

Broader Humanitarian Context

The Applicants present their case within the catastrophic humanitarian crisis unfolding in Gaza and across the middle east. They argue that the IDF, emboldened by policies of the current Israeli government, is committing some of the **gravest crimes in international law and international humanitarian law**, including:

- **Genocide and famine:** The starvation of civilians, particularly children have reached catastrophic proportions.
- **Targeted attacks:** Hospitals, medical workers, aid responders, and journalists have been attacked with utter impunity.
- **Regional destabilisation:** IDF operations have extended to Yemen, Syria, Lebanon, and the Islamic Republic of Iran, including reported airstrikes on nuclear facilities used for civilian purposes, raising the risk for human health disasters and an affected environment.

South Africa's Moral and Legal Obligations

The Applicants contend that South Africa, as a nation with a strong anti-apartheid legacy and a signatory to the **Rome Statute of the International Criminal Court**, has an intrinsic moral and legal duty to prevent its nationals and citizens from being participants in such crimes, either directly or indirectly.

Furthermore, as of 1998, South Africa ratified the **Convention on the Prevention and Punishment of the Crime of Genocide** which obligates the nation to not only prevent genocide where possible, but further, to punish it.

The Applicants argue that failure to enforce the Republic's laws not only weakens South Africa's constitutional democracy but also diminishes its credibility in international forums where it has consistently called for accountability in global conflicts.

Moreso, there is specific legislation mandating that South Africa prevent egregious acts of terrorism and related activities thereto which has led to this genocide. An example of this would

be the *Protection of Constitutional Democracy against Terrorism and Terror Related Activities Act*.

The continued allowance of South African nationals and citizens, facilitated by Zionist institutions for the recruitment and procurement of young impressionable Jewish youth, men and women to actively participate in the genocide carried out by the IDF is a flagrant violation of the country's anti-terrorism laws.

Our laws empower South Africa to implement the necessary sanctions contemplated in the Act, against violators and to prevent and deter these terror related activities being committed by an enabled IDF. In failing to do so, the country has, of its own accord, failed to meet its legal obligations.

The Applicants' Submissions

Attorney Ziyaad Patel stresses that this case is equally about upholding accountability and protecting South Africa's integrity. As an international human rights defender and lawfare advocate for almost two decades, Attorney Patel posits that South Africans cannot be allowed to participate in atrocities abroad while our authorities look the other way.

The evidence has thus been placed before the State Authorities. Now, our courts must ensure that the law is enforced, and that South Africa plays its role in protecting and promoting international peace and justice.

This application also bears on Israel's contemptible terrorism policies on the present genocide including the unlawful targeting and assassination of political leaders like Ismail Haniyeh in Tehran undermining the territorial sovereignty of another State.

The pager attack in Lebanon in September 2024, where Israel's Netanyahu accepted responsibility of the attack is reflective of the IDF's indiscriminate attacks in its attempt to target Hezbollah resistance fighters in support of Palestinian rights to self – determination had caused civilian fatalities and thousands more innocent victims were injured with life altering disabilities.

Booby trapped devices which had exploded indiscriminately in public marketplaces is a serious violation of international law and constitutes a war crime. This is but one example of the cruelty in Israel's state terror inflicted on a civilian population in violation of international conventions and instruments dealing with terrorist and related activities and also a breach of South Africa's anti-terrorism laws.

Offences relating to explosive or other lethal devices in POCDATARA

- **Section 5:** *Any person who intentionally delivers, places, discharges or detonates an explosive or other lethal device in, into or against a place of public use, a state or government facility, a public transport facility, a public transportation system, or an infrastructure facility. with the purpose, amongst others, of causing-*
 - (a) *death or serious bodily injury; or*
 - (b) *extensive damage to, or destruction of such a place, facility or system, where such destruction results in or is likely to result in major economic loss, is guilty of an offence relating to explosive or other lethal devices.*

The Applicants make comprehensive submissions wherein armed struggle like in South Africa during the anti-apartheid struggle, is a legitimate legal right under international law of a colonised and oppressed peoples' right to self-determination.⁵ This resolution reaffirms the legitimacy of the struggle of peoples for independence, territorial integrity, national unity and liberation from colonial domination. It further characterises the struggle against apartheid and foreign occupation by all available means necessary, including armed struggle.

⁵ UN General Assembly Resolution 45/130 - **Importance of the universal realization of the right of peoples to self-determination and of the speedy granting of independence to colonial countries and peoples for the effective guarantee and observance of human rights**

A recent UN report ⁶ confirms the case that South Africa had already been put at the ICJ, when provisional measures were sought by a state party against another state party, Israel in the protection of rights of a civilian population in Gaza by invoking the genocide convention.

The apex court found the commission of plausible genocide in Gaza by Israeli state actors and agents. Benjamin Netanyahu and his former defence Minister Yoav Galant are already sought after at the International Criminal Court where warrants of arrests have been issued.

The gross acts of terrorism perpetrated by the IDF in its unprovoked and unlawful air strikes on Iranian nuclear facilities further, jeopardising the environment and civilian population is also referenced in the application. The IDF's impunity goes unhindered as air strikes in Iran also hit the **Shahid Rajaee Girls School in Region 3, Tehran** causing child civilian fatalities.

The scope of the investigations into complicit Zionist institutions must extend to the present global military industrial complex, which include politicians, bankers, global financiers and arms manufacturers and multinational corporations who continually breed war mongering. These provocateurs fuel the violation of fundamental human rights by way of arming and weaponizing the IDF in the commission of its crimes in Gaza, occupied Palestine and the middle east region.

This was further addressed by UN special rapporteur, Francesca Albanese in a recent report ⁷, which entailed the complicity of influential third states, must be held to account for the genocidal war being perpetrated on the civilian Palestinian population.

Francesca Albanese's Report on 20 October 2025

*"The ongoing genocide in Gaza is a collective crime, sustained by the complicity of influential Third States that have enabled longstanding systemic violations of international law by Israel. **Framed by colonial narratives that dehumanize the Palestinians, this live-***

⁶ A/HRC/60/CRP.3 - Legal analysis of the conduct of Israel in Gaza pursuant to the Convention on the Prevention and Punishment of the Crime of Genocide

⁷ A/80/492: "Gaza Genocide: a collective crime" – Report of the Special Rapporteur, F. Albanese on the situation of human rights in the Palestinian territories occupied since 1967. – 20 October 2025.

streamed atrocity has been facilitated through Third States' direct support, material aid, diplomatic protection and, in some cases, active participation. It has exposed an unprecedented chasm between peoples and their governments, betraying the trust on which global peace and security rest. The world now stands on a knife-edge between the collapse of the international rule of law and hope for renewal. Renewal is only possible if complicity is confronted, responsibilities are met, and justice is upheld."

Reference is also made in the advisory opinion relating to the legal consequences arising from the Policies and Practices of Israel in the Occupied Palestinian Territory, including East Jerusalem

In July 2024, an advisory opinion from the ICJ was delivered regarding the legal consequences arising from the policies and practices of Israel in the occupied Palestinian territory, including east Jerusalem.

The ICJ handed down a ruling that Israel's military occupation of the Palestinian territories is illegal, that Israel enforces systemic discrimination between the legal and governance treatment of Israeli settlers and occupied Palestinians.

This is in contravention of the *1965 International Convention on the Elimination of All Forms of Racial Discrimination*.

Israel has to end its military occupation as soon as possible.

What is the Relief Sought?

The applicants are seeking for the following order/s to be granted by the above High Court:

1. That the delay and prevarication in the NPA's decision whether or not to prosecute **Dean Samuel Goodson** is **unlawful**;
2. That the **NPA** must **provide a decision** as to whether they will prosecute **Goodson** within two months of the court order being granted;

3. The Respondents, headed by the Presidency as the head of the national security cluster must develop an efficient national safety and security strategy framework to include complicitous Israeli / Zionist institutions involved in unlawful recruitment of South African nationals and citizens into the IDF. The Presidency must further report to the Pretoria High Court of the deterrent measures to be implemented within **2 (TWO)** calendar months of granting this order, to also include, *inter alia*:
 - a) The curtailment, restriction of South African nationals, citizens either placed under investigation or under alleged suspicion, where factual circumstances warrant to exist or where there is *prima facie* evidence of such persons intending to leave the territorial borders of the Republic of South Africa to enter the state of Israel either directly, or indirectly through another State, to render unlawful military service, and/or mercenary activities in the IDF; and,
 - b) The reconnaissance and surveillance of both South African and Israeli nationals and citizens entering the territorial borders of the Republic of South Africa who are either under suspicion and/or under investigation and/or alleged to have been serving in the IDF, who are perpetrating egregious crimes in Gaza, the occupied Palestinian territories and the middle east region.

Should the above relief be granted by the High Court, it would limit South African nationals/ citizens involvement in the perpetuated genocide by Israel and the IDF. Moreso it would ensure South Africa's domestic laws are enforced and aligned with its foreign policy for accountability in attaining regional peace and harmony and meeting its legal obligations in the Rome Statute, international humanitarian law and the Genocide Convention.

The application also bears on investigations lodged with the Authorities for the following accused suspects alleged to have violated the laws of the Republic of South Africa in rendering unlawful military service for the IDF in Gaza and the OPTS from or on about the period 2014 to present.

This shall include such investigation of their alleged participation in recent Israeli regional aggression and conflict in wars waged by the IDF in Lebanon, Iran and Yemen.

Evidence of South African nationals / citizens in the IDF

1. **Dean Samuel Goodson** – Admitted to serving in the IDF in his early twenties and it is alleged alongside a number of his siblings. Dean served as a Combat engineers man and a decorated ‘grey beret’ in the IDF.
2. **Joseph Vaughn Enna** – Twenty-Two years old at the time and admitted to having served as a “combat soldier” in Tzanchanism for the IDF in 2019.
3. **Tali Pitluk** – Admitted to having served as a “lone soldier” in the IDF in 2019.
4. **Jordyn Scop** – Twenty-One years old at the time alleged to have served in the IDF from on or about May 2021. His mother Kim Scop corroborates Jordyn’s Scops military service in the IDF.
5. **Gina De Abreu** – Admitted to having served in the IDF from around April 2018.
6. **Nicole Verreyne** – Twenty-One years old at the time having admitted to serving in the IDF during 2020.
7. **Ariel Lipshitz** - Admitted to having served in the IDF as a “lone soldier in 2018 in the Golani Brigade” and studied at the **King David High School in Linksfield, Johannesburg.**
8. **Dean Unterslak** – Alleged to have served in the IDF in the Paratroopers Brigade, participated in the Tzuk Eitan [Operation Protective Edge in Gaza in 2014].
9. **Yaron Eisenburg** – Admitted to serving as a “lone soldier” in the IDF between 2017 - 2018.
10. **Adam Ross** – Published images indicating his service in the IDF during the period 2014 Operation Protective Edge in Gaza in 2014 – 2015. Evidence of him returning to South Africa with a surprise visit to his family.
11. **Dylan Padowitz** - He was from Cape Town who studied at **Hoëskool Hoogenhout and Cedar House School.** Published images indicating his service in the IDF in 2018 with the Golani Brigade.

12. **Talya Osenndryver** – From Johannesburg alleged to have served in the IDF in 2012 to be investigated during 2012 Gaza War, “Pillar of Defence”. She was recruited and trained as an IDF fighter pilot. This is corroborated by her mother Corrine Osenndryver and was supported through the Garin Tzabar recruitment organisation for lone soldiers, intending to make Aliyah to Israel.
13. **Annali Harmse** – A **DIRCO official** alleged to be facilitating diplomatic assistance to SA nationals / citizens who unlawfully serve in the IDF.
14. **Kelly Odes** – From **King Davids School, Linksfield**, it was reported in 2021 by the Jewish Report, of her active service as an IDF Spokespersons Unit as a military communicator. Also chosen by the IDF’s operations division commander as an “outstanding soldier”.
15. **Josh Rod** – Nineteen years at the time, serving in the IDF, from Johannesburg South Africa. Graduated from **Yeshiva College, South Africa**. Admitted to serving as Platoon Sergeant in the IDF from February 2013 to August 2015. It is alleged he served as a team commander of basic training and then later as a platoon sergeant in the Shimshon Battalion, Kfir Brigade of the IDF Infantry. Experience with working in a leadership position in high pressure situations. , “*Outstanding Commander Award - Shimshon Battalion IDF (Apr 2015)*”. Community Volunteer for the Telfed-South African Zionist Federation (Israel) from October 2015 to August 2020.
16. **Leroi Taljaard** – Reported to have joined in 2019 his first jump as a paratrooper in 2019 in postings by his mother Sarie Taljaard. Alleged to have been in active IDF service since the October 2023. Sarie Taljaard also references her other son **Eben Taljaard** in active service with the IDF, October 2023. Also, confirmation of his induction in the into the IDF by his sister Nady Kelly Wentzel.
17. **Zara-Lee Maloon** – Aged twenty-two years during service as a “lone soldier”. Operations Sergeant from August 2019 to November 2021 having served in special forces Golani in 2019. Furthermore, received best soldier award. Also, another South African, **Eden Shalkoff** from Cape Town, South Africa, co-chairs with Zahra-Lee Maloon Co-head of Telfed Youth Committee. Both having served in the IDF Golani Brigade.

18. **Gavriel Labe** – During the period 10 March 2023 evidence where he also completed the “Hovshim” course training to be a combat medic. On or about the period August 2024 serving in the paratroopers.
19. **Josh Jackson** – Went to **King David High School, Johannesburg**. As of April 2023, he was in military service with the IDF. A post on 22 January 2023 on the Yeshivat Eretz Ha Tzvi Facebook Group congratulates the suspect on his marriage referring to him as a Beis2Base soldier.
20. **Ben Rattle** – From Hermanus, Cape Town, Admitted to serving in the IDF in 2022, Active duty with the IDF in Gaza Strip since November 2023.
21. **Aaron Bayhack** – In an X documentary video post, 04 October 2024 by a Palestinian journalist, Younis Tirawi, an unprecedented investigation into war crimes in Gaza, was exposed by an elite and secretive IDF sniper battalion, the Ghost Unit, ‘Refaim’ in Hebrew. Bayhack is clearly identified as being part of the IDF’s Paratroopers Battalion 202.

Investigations exposed cold blooded executions of unarmed civilians near schools, places of shelter and hospitals from the Al Quds Hospital in Tel al-Hawa, Gaza City to Al Nasser Hospital in Khan Younis.⁸

In one of the two execution videos illustrated in thermal vision targeted executions was near the Al Nabulsi junction, in South Gaza City, known from the time period between January and April 2024, where several mass executions were committed by Israeli troops of Palestinians waiting for flour bags and humanitarian aid on Gaza City’s coastal road.

Another one of the executions was by **Daniel Raab** of the Ghost Unit which was committed right behind the Al Jalil Secondary school in Tel Hawwa, Barcelona Park, where many families were sheltering inside.

⁸ X video post by Younis Tirawi 1/19 Exclusive– The Ghost Unit documentary –
<https://x.com/ytirawi/status/1842242729436201158/video/1>

Extract Transcript of Modus Operandi of the IDF Ghost Unit

“One is that there is a red line that the Palestinians don’t know about. Endangering in a real way is a matter of proximity. It is a matter of distance, that this is the line defined. Palestinians don’t know what the line is, but we know.

Two is that the Palestinians are unaware of the presence of an Israeli force in the area.

Three is that there was a procedure to open fire on anyone above the military age.”

Tirawi exposes the truth of the Ghost Unit in which South African, Bayhack is an elite IDF sniper:

“Palestinian unarmed individuals, many simply trying to flee or retrieve the bodies of their loved ones. And yet, even as they tried to recover the dead, the snipers continued to fire. What we discovered mirrors the same brutal tactics used by the Ghost unit in Khan Younis. These were not acts of defence. They were calculated acts of violence against people who cannot defend themselves.”

The alleged accessories and co-perpetrators list of complicit Zionist Institutions implicated in violation of the RFMAA, SA’s ICC Act and contravention of anti-terrorism laws and organised crime are inter alia:

1. **The Israel Centre - Cape Town** which co-ordinates with the Garin Tzaber Organisation for the recruitment of lone soldiers.
2. **The South African Zionist Federation** which works and is closely associated with **TELFED**, involved in the facilitation of IDF recruitment. The SAZF also promotes an ideology that is fundamentally racist and discriminatory in nature, presently evinced by the ethnocratic Zionist policies of the Israeli government. The SAZF supports institutionalised apartheid practices in the occupied Palestinian territories and breeds

Jewish settler colonialism, which dispossesses Palestinians of their land. The SAZF must be investigated for alleged complicity in the commission of a war crime in the unlawful expansion of settlements in the Palestinian territories.

3. **The Zionist Federation of South Africa – Israel (TELFED)** acts an active conduit for recruitment in Southern Africa into the IDF through the Lone Soldier programme.
4. **The Jewish National Fund (JNF)** dispossesses Palestinian families of their land and homes in the West Bank through the Keren Kayemeth LeIsrael (KKL) programme. The JNF has a long history of funding illegal military occupation of Palestine and seizing Palestinian land while benefiting financially from tax breaks in Canada,” Palestinian human rights organisation Al-Haq disclosed.

The JNF must also be investigated for its complicity in a war crime, by greenwashing the occupation, where among the ruins of a destroyed Palestinian village of Lubyia, a group of South African Jews publicly apologize to the descendants of Lubyia refugees for their donations to the Jewish National Fund of South Africa, which were used to plant part of a forest on Palestinian land.

The Internationally based accused suspects included herein are the architects of the Gaza genocide with genocidal intent executed through the State Executive / Knesset of Israel in the perpetration of egregious crimes including *inter alia*: crimes of aggression, war crimes, crimes against humanity - ethnic cleansing, torture of Palestinian detainees through the Israeli prison Services, apartheid practices and settler colonialism which dispossesses Palestinians of their civil liberties and fundamental human rights.

1. **Isaac Herzog** – President, Israel
2. **Benjamin Netanyahu** – Prime Minister, Israel
3. **Bezalel Smotrich** – Finance Minister, Israel
4. **Yoav Gallant** – Minister of Defence, Israel
5. **Itamar Ben Gvir** – Minister of National Security, Israel
6. **May Golan** – Minister of Social Equality and the Advancement of the Status of Women, Israel

7. **Israel Katz** – Minister of Energy and Infrastructure, Israel
8. **Amichai Eliyahu** – Minister of Heritage, Israel
9. **The Incumbent Knesset of Israel**
10. **Herzi Halevi** – Chief of the General Staff of the IDF, Israel
11. **Arik Maslawi** – Travelled to South Africa for a holiday in December 2023 / January 2024, after having served as a **combat engineer in the 7086 Battalion of Golani Brigade**. He has boasted online about “Breaking Gaza” in January 2024.
12. **Uri Shay Haddad** – Has served in an IDF unit in Gaza. There are images of him in combat gear and military fatigues in the ongoing genocide. It was reported that he was vacationing and socialising freely in Cape Town, South Africa. He also attended a service at the South African Jewish Museum in Cape Town and was acknowledged for his combat service in the IDF on or about the period November 2024. Included is also evidence of his presence in a Palestinian home / building with others in his unit, who are celebrating the destruction of civilian infrastructure in Gaza where the IDF’s has committed genocide on Gaza’s civilian population.
13. **The Incumbent Generals and Commanders of the Israeli Defence Force**

The IDF perpetration of War Crimes, use of white phosphorous and DIME (Dense Inert Metal Explosives and Flechettes Bombs / other banned munitions in a densely populated civilian areas during the 2008-2009 war in Gaza, “Operation Cast Lead”

The UN Fact finding mission report,⁹ condemned Israel’s actions and the high number of civilian casualties and children killed. Amongst its findings indiscriminate attacks by Israeli forces resulted in the loss of life and injury to civilians.

An extensive complaint, known as the ‘**Gaza Docket**’ was lodged evincing the IDF’s war crimes during the war known as ‘Operation Cast Lead’.

Part of the record contained already then disclosed Israeli apartheid practices, belligerent occupation and settler colonial imposition in formal submissions made by the former Minister

⁹ A/64/490 - Report of the Independent International Fact-Finding Mission on the Gaza Conflict

of Intelligence and anti-apartheid stalwart Ronnie Kasrils to the Authorities, who was duly represented by the Applicants' Attorneys.

IDF Perpetration of War Crimes 2014 in the Gaza Strip - "Operation Protective Edge"

In the 2014 war in Gaza, the UN Fact Finding Mission, found that in the war in Gaza, under the auspices 'Protective Edge' in 2014, the scale of devastation and human fatalities, injuries and destruction of civilian infrastructure was unprecedented and disproportional. The reported death toll of 2,251 Palestinians including 1,462 Palestinian civilians, of whom 299 were women and 551 children. At least 11,231 Palestinians, including 3,540 women and 3,436 children were injured of whom 10 per cent suffered permanent disability as a result thereof.¹⁰

On 5 February 2021, Pre-Trial Chamber I of the International Criminal Court (ICC) decided by majority, that the Court's territorial jurisdiction in the Situation in Palestine, a State Party to the ICC Rome Statute extends to the territories occupied by Israel since 1967, namely Gaza and the West Bank, including East Jerusalem.

The ICC ruled it has jurisdiction over the situation in the OPTs, paving the way for the tribunal's prosecutor to open a war crimes investigation.

This decision was based on jurisdictional rules in The Hague-based court's founding documents and does not imply any attempt to determine statehood or legal borders.

The ICC prosecutor, Fatou Bensouda, in December 2019 stated in conclusion of a preliminary examination, that she is satisfied there is a reasonable basis to proceed with an investigation into the situation in Palestine, pursuant to *article 53(1) of the Statute*.

In brief, the ICC prosecutor is satisfied *(i) war crimes have been or are being committed in the*

¹⁰ UN A/HRC/29/52, UN Report of the independent commission of inquiry established pursuant to Human Rights Council resolution S-21/1, Part V, Principal Findings and Conclusions, paragraph 20, p 6

West Bank, including East Jerusalem, and the Gaza Strip ("Gaza") (for specifics, see paras. 94-96)¹¹; (ii) potential cases arising from the situation would be admissible; and (iii) there are no substantial reasons to believe that an investigation would not serve the interests of justice.¹²

Following the decision by the ICC to exercise territorial jurisdiction, Palestinians have asked the court to look into Israeli actions during its 2014 assault against Palestinians in the besieged Gaza Strip, as well as to investigate Israel's unlawful construction of settlements in the occupied West Bank and annexed East Jerusalem.

Respected political commentator **Norman Finkelstein's** analysis of the UN Fact Finding Mission Report Unequivocally delineates IDF actions are well intended (*dolus directus*), orchestrated and planned. Their actions are blameworthy and bear criminal responsibility upon Israeli state leaders and military commanders for their part and control in indiscriminate bombing, devoid of military distinction of targets and proportionality in use of force towards achieving a military objective, but to impose the severest collective punishment on the residents of Gaza.

Recent interception of the Sumud Flotilla and previous Humanitarian Aid Missions

The *Global Sumud Flotilla*, a civilian-led humanitarian mission, comprised of dozens of vessels from many countries, aiming to deliver aid to Gaza and break the Israeli naval blockade. However, on or about **October 1-2, 2025**, Israeli naval forces intercepted several of the flotilla's vessels in international waters.

It was confirmed that South Africans among those abducted and detained included **Nkosi Zwelivelile "Mandla" Mandela** (Nelson Mandela's grandson), **Zukiswa Wanner**, and **Reaaz Moolla**. South Africa's President **Cyril Ramaphosa** has condemned the interception and abduction, saying it violates international law, including the United Nations Convention on the

¹¹ Prosecution requests pursuant to article 19(3) for a ruling on the Court's territorial jurisdiction in Palestine <https://www.icc-cpi.int/Pages/record.aspx?docNo=ICC-01/18-9>

¹² Statement of ICC Prosecutor, Fatou Bensouda, on the conclusion of the preliminary examination of the Situation in Palestine, and seeking a ruling on the scope of the Court's territorial jurisdiction (icc-cpi.int)

Law of the Sea, and infringes on the sovereignty of nations whose flags are flown on the flotilla's vessels.

This incident has drawn outrage across South Africa, echoing the country's historical resistance to apartheid and its commitment to international justice. Civil society organisations have labelled Israel's conduct as "piracy on the high seas," denouncing it as a continuation of the state's broader pattern of impunity and disregard for international norms.

It further echoes the past interception of the *Madleen* vessel. On 09 June 2025, the IDF committed a flagrant act of state piracy in international waters by storming the *Madleen*, a British-flagged civilian vessel *en route* to Gaza. The *Madleen* sailed in international waters, under a recognized flag.

Under the *San Remo Manual on International Law Applicable to Armed Conflicts at Sea* (1994), interference with such a vessel is only permitted under a lawful blockade. Israel's siege of Gaza, in place since 2007, is not lawful—it is collective punishment in violation of *Article 33 of the Fourth Geneva Convention*, as confirmed by the UN Fact-Finding Mission on the *Mavi Marmara* in 2011.

The *Mavi Marmara* was a similar vessel as part of the Gaza Freedom Flotilla aid mission in 2010 which Israel unlawfully intercepted as well.

At least nine Turkish and one Turkish / American humanitarian activist were killed and many more abducted including Cape Town journalist Gadija Davids. Due to the inhumane treatment suffered while she was held captive by IDF forces, Ms Davids represented by the Applicants' Attorneys, laid a formal criminal complaint with South African Authorities.

An investigation was called into alleged violations of international law. In 2012, the office of the **PCLU-NDPP** stated there were "reasonable grounds" to investigate where jurisdictional grounds were met pertaining to the events aboard the *Mavi Marmara*.

Further investigations led to a decision from a process in the Istanbul, Republic of Turkey, Seventh High Criminal Court, whereby warrants of arrest were issued for the four naval

commanders for the commission of murder and war crimes on the Mavi Marmara¹³, whereby the suspects were circulated on the border control system and submitted to Interpol Pretoria for a red notice to be issued by their Turkish counterparts.

Should these suspects enter the territory of the Republic of South Africa, they would be arrested and either extradited or face criminal prosecution within the territory of the Republic of South Africa.

The above explicitly serves as evidence of the ongoing violation of international law being committed by Israel with utter impunity.

As above, and on numerous occasions the IDF have created unlawful sea blockades, starved Gaza's civilian population and desisted through military force naval humanitarian aid missions to reach the people of Gaza. International humanitarian law and the Genva conventions and maritime law strictly prohibit such land, air and sea blockades.

Conclusion

This High Court case demands individual and collective responsibility. It strikes at the intersection of South Africa's domestic law, international legal commitments, and foreign policy priorities.

By placing evidence of unlawful foreign military service before the court, the Applicants are demanding decisive action against criminal impunity, both at home and abroad.

Should no action be taken there is serious risk and threat to our own national sovereignty and intervention of the court is paramount in ensuring sanctity of our constitutional imperatives founded on our democratic values and protection of our sovereign borders from both internal and external existential threats accompanied by brazen violation and recruitment into the IDF, carrying out the genocidal policies of the present Israeli regime.

¹³ **Rau Aluf Gabiel Ashkenazi, Eliezer Alfred Marom, Avishay Levi, Amos Aydlin IDF Naval Commanders**

In essence, South Africa's posturing on the global stage by challenging the Israeli regime both at the ICC and the ICJ is at risk of appearing merely performative if nothing is done within its own national jurisdiction.

While the South African Government does positively create the impression in the international community that it is actively advancing the protection of Palestinian rights, our authorities are refusing to prevent the participation of their very own nationals and citizens in Israel who are serving in the IDF and perpetrating egregious war crimes and gross human rights violations which impute dereliction of duty in their oath of office to uphold the constitution of the Republic and the rule of law.

As such, the outcome of this case could have significant implications for South Africa's national security interests, its constitutional legal system, the rule of law, and South Africa's role in global efforts to uphold international humanitarian law in the midst of the Palestinian genocide in Gaza and the IDF's unlawful belligerent occupation of Palestine.

Provisions of the RFMAA

- **Section 1 (iii):** *“foreign military assistance” means military services or military-related services, or any attempt, encouragement, incitement or solicitation to render such services, in the form of—*
 - *(a) military assistance to a party to the armed conflict by means of— (i) advice or training;*
 - *(ii) personnel, financial, logistical, intelligence or operational support;*
 - *(iii) personnel recruitment;*
 - *(iv) medical or para-medical services; or*
 - *(v) procurement of equipment;*
- **Section 2:** *No person may within the Republic or elsewhere recruit, use or train persons for or finance or engage in mercenary activity.*

- **Section 3:** *No person may within the Republic or elsewhere—*
 - *(a) offer to render any foreign military assistance to any state or organ of state, group of persons or other entity or person unless he or she has been granted authorisation to offer such assistance in terms of section 4;*
 - *(b) render any foreign military assistance to any state or organ of state, group of persons or other entity or person unless such assistance is rendered in accordance with an agreement approved in terms of section 5.*

- **Section 7(1):** *An authorisation or approval in terms of sections 4 and 5 may not be granted if it would—*
 - *(a) be in conflict with the Republic's obligations in terms of international law;*
 - *(b) result in the infringement of human rights and fundamental freedoms in the territory in which the foreign military assistance is to be rendered;*
 - *(c) endanger the peace by introducing destabilising military capabilities into the region where the assistance is to be, or is likely to be, rendered or would otherwise contribute to regional instability and would negatively influence the balance of power in such region;*
 - *(d) **support or encourage terrorism in any manner;***
 - *(e) contribute to the escalation of regional conflicts;*
 - *(f) prejudice the Republic's national or international interests;*
 - *(g) be unacceptable for any other reason.*

Provisions of POCDATARA

PRE-AMBLE

AND WHEREAS terrorist and related activities, in whichever form, are intended to achieve political and other aims in a violent or otherwise unconstitutional manner, and thereby undermine democratic rights and values and the Constitution; AND WHEREAS terrorist and related activities are an international problem, which can only be effectively addressed by means of international co-operation;

- **Section (1)(iv):** *“engages in a terrorist activity”*. with reference to sections 2 and 3, includes-
 - (a) *the commission, performance or carrying out of*
 - (b) *the facilitation of, participation or assistance in, or contribution to the commission, performance or carrying out of;*
 - (c) *the performance of an act in preparation for or planning of; or*
 - (d) *instructing, directly or indirectly, the –*
 - (i) *commission, performance, carrying out of;*
 - (ii) *facilitation of, participation or assistance in, or contribution to the commission, performance or carrying out of; or*
 - (iii) *performance of an act in preparation for or planning of, a terrorist activity, and the expressions “to engage in a terrorist activity”, “engaging in a terrorist activity” and “engagement in a terrorist activity” shall be construed accordingly;*

- **Section (1)(xxv):** *“terrorist activity”*, with reference to this section and sections 2, 3 and 17(2), means –
 - (a) *any act committed in or outside the Republic, which –*
 - (i) *involves the systematic, repeated or arbitrary use of violence by any means or method;*
 - (ii) *involves the systematic, repeated or arbitrary release into the environment or any part of it or distributing or exposing the public or any part of it to –*
 - (aa) *any dangerous, hazardous, radioactive or harmful sub- stance or organism;*
 - (bb) *any toxic chemical; or*
 - (cc) *any microbial or other biological agent or toxin*
 - (iii) *involves the systematic, repeated or arbitrary release into the environment or any part of it or distributing or exposing the public or any part of it to–*
 - (aa) *any dangerous, hazardous, radioactive or harmful sub- stance or organism;*
 - (bb) *any toxic chemical; or*

- (cc) any microbial or other biological agent or toxin
 - (iv) causes serious risk to the health or safety of the public or any segment of the public;
 - (v) causes the destruction of or substantial damage to any property, natural resource, or the environmental or cultural heritage, whether public or private;
 - (vi) is designed or calculated to cause serious interference with or serious disruption of an essential service, facility or system, or the delivery of any such service facility system, whether public or private, including, but not limited to –
 - (aa) a system used for, or by, an electronic system, including an information system;
 - (bb) a telecommunication service or system;
 - (cc) a banking or financial service or financial system;
 - (dd) a system used for the delivery of essential government services; transport provider;
 - (ee) a system used for, or by, an essential public utility or transport provider
 - (ff) or an essential infrastructure facility; or
 - (gg) any essential emergency services, such as police, medical or civil defence services;
 - (vii) causes any major economic loss or extensive destabilisation of an economic system or substantial devastation of the national economy of a country; or
 - (viii) creates a serious public emergency situation or a general insurrection in the Republic,
- whether the harm contemplated in paragraphs (a)(i) to (vii) is or may be suffered in or outside the Republic, and whether the activity referred to in subparagraphs (ii) to (viii) was committed by way of any means or method; and

- *(b) which is intended, or by its nature and context, can reasonably be regarded as being intended, in whole or in part, directly or indirectly, to –*
 - *(i) threaten the unity and territorial integrity of the Republic;*
 - *(ii) intimidate, or to induce or cause feelings of insecurity within, the public, or a segment of the public, with regard to its security, including its economic security, or to induce, cause or spread feelings of terror, fear or panic in a civilian population; or*
 - *(iii) unduly compel, intimidate, force, coerce, induce or cause a person, a government, the general public or a segment of the public, or a domestic or an international organisation or body or intergovernmental organisation or body, to do or to abstain or refrain from doing any act, or to adopt or abandon a particular standpoint, or to act in accordance with certain principles,*
 - *whether the public or the person, government, body, or organisation or institution referred to in subparagraphs (ii) or (iii), as the case may be, is inside or outside the Republic; and*
 - *(c) which is committed, directly or indirectly, in whole or in part, for the purpose of the advancement of an individual or collective political, religious, ideological or philosophical motive, objective, cause or undertaking;*
- **Section (1)(xxvi):** *“terrorist and related activities” means any act or activity related to or associated or connected with the commission of the offence of terrorism, or an offence associated or connected with a terrorist activity, or a Convention offence, or an offence referred to in sections 11 to 14.*

Provisions of the Implementation of the Rome Statute of the International Criminal Court Act 27 of 2002

- **Section 2: Applicable law**
 - *In addition to the Constitution and the law, any competent court in the Republic hearing any matter arising from the application of this Act must also consider and, where, appropriate, may apply*
 - *(a) conventional international law, and in particular the Statute;*
 - *(b) customary international law; and*
 - *(c) comparable foreign law.*
- **Section 3: Objects of Act**
 - *The objects of this Act are*
 - *(a) to create a framework to ensure that the Statute is effectively implemented in the Republic;*
 - *(b) to ensure that anything done in terms of this Act conforms with the obligations of the Republic in terms of the Statute;*
 - *(c) to provide for the **crime of genocide, crimes against humanity and war crimes**;*
 - *(d) to enable, as far as possible and in accordance with the principle of complementarity as referred to in Article 1 of the Statute, the national prosecuting authority of the Republic to prosecute and the High Courts of the Republic to adjudicate in cases brought against any person accused of having committed a crime in the Republic and beyond the borders of the Republic in certain circumstances; and*
 - *(e) in the event of the national prosecuting authority declining or being unable to prosecute a person as contemplated in paragraph (d), to enable the Republic to cooperate with the Court in the investigation and prosecution of persons accused of having committed crimes or offences referred to in the Statute, and in particular to*
 - *(i) enable the Court to make requests for assistance;*

- (ii) *provide mechanisms for the surrender to the Court of persons accused of having committed a crime referred to in the Statute;*
 - (iii) *enable the Court to sit in the Republic; and*
 - (iv) *enforce any sentence imposed or order made by the Court*
- **Chapter 2: Jurisdiction of South African courts in respect of crimes**
 - (1) *Despite anything to the contrary in any other law of the Republic, any person who commits a crime, is guilty of an offence and is liable on conviction to a fine or imprisonment, including imprisonment for life, or such imprisonment without the option of a fine, or both a fine and such imprisonment.*
 - (2) *Despite any other law to the contrary, including customary and conventional international law, the fact that a person*
 - (a) *is or was a head of State or government, a member of a government or parliament, an elected representative or a government official; or*
 - (b) *being a member of a security service or armed force, was under a legal obligation to obey a manifestly unlawful order of a government or superior, is neither*
 - (i) *a defence to a crime; nor*
 - (ii) *a ground for any possible reduction of sentence once a person has been convicted of a crime.*
 - (3) *In order to secure the jurisdiction of a South African court for purposes of this Chapter, any person who commits a crime contemplated in subsection (1) outside the territory of the Republic, is deemed to have committed that crime in the territory of the Republic if*
 - (a) *that person is a South African citizen; or*
 - (b) *that person is not a South African citizen but is ordinarily resident in the Republic; or*
 - (c) *that person, after the commission of the crime, is present in the territory of the Republic; or*
 - (d) *that person has committed the said crime against a South African citizen or against a person who is ordinarily resident in the Republic.*

Referenced Reports, Case Judgements and Other Sources in the High Court

Application

- Submission by Attorney ZEP at 31st Session of Human Rights Council, United Nations Held at Geneva, Switzerland.
- HRW – Human Rights Watch “A threshold Crossed – Israeli Authorities and crimes of apartheid and persecution”
- UN Resolution 242 of 1967 which was the unanimously supported resolution under Chapter VI of the UN Charter denoting the borders between the Palestinian State and Israel
- UN Resolution 2334 of 2016 which concerns the Israeli settlements in Palestinian territories since 1967, including East Jerusalem.
- South Africa’s referral in November 2023 to the ICC dossier of egregious crimes by the State of Israel in a comprehensive dossier lodged with the UN Secretary general, 27 February 2025.
- Application of the Convention on the Prevention and Punishment of the Crime of Genocide in the Gaza Strip ICJ judgements and orders on the provisional measures (South Africa v State of Israel)
 - Urgent Request For Additional Measures Under Article 75(1) Of The Rules Of Court Of The International Court Of Justice issued on 12 February 2024 as a follow up to the abovementioned Application.
 - Further request for modification of the above orders on 24 May 2024 regarding the famine being witnessed near the Rafah Border crossing.
- ICJ advisory opinion Legal consequences arising from the policies and practices of Israel in the occupied Palestinian Territory, including East **Jerusalem**.
- 21 November 2024 Press statement by the ICC rejecting Israel’s challenge based on jurisdiction and issues warrants of arrest for Benjamin Netanyahu and Yoav Gallant.
- Public Dossier by SA on acts of genocide - Letter dated 27 February 2025 from the Permanent Representative of South Africa to the United Nations addressed to the President of the Security Council

- Open Letter penned and supported by Judges and Lawyers in the United Kingdom Concerning the Occupied Palestinian Territory.
- Article 51 of the UN charter which provides UN Security Council's stance on Acts of Aggression
- Article 56 Protocol of the Geneva Convention which protects works and installations that contain dangerous works such as nuclear and similar energy facilities.
- Legal Consequences Arising From The Policies And Practices Of Israel In The Occupied Palestinian Territory, Including East Jerusalem – The advisory opinion summary provided by the International Court of Justice on 19 July 2024
- 18 December 2023 statement in the media by DIRCO denouncing the recruitment of South African citizens and permanent residents to the IDF
- The request to circulate warrants of arrest for those individuals found to be responsible for the attack on the Mavi Maramara vessel, issued by the SAPS in November 2015.
- A/80/492: "Gaza Genocide: a collective crime" – Report of the Special Rapporteur, F. Albanese on the situation of human rights in the Palestinian territories occupied since 1967. – 20 October 2025.
- *The Regulation of Foreign Military Assistance Act* 15 of 1998
- *Protection of Constitutional Democracy Against Terrorist and Related Activities Act* No. 33 of 2004.
- *Prevention of Organised Crime Act* 121 of 1998
- *South Africa's Implementation of the Rome Statute of the International Criminal Court Act* 27 of 2002
- *Rome Statute of the International Criminal Court* of 1998