

SUPPORTING AFFIDAVIT

I, Ayanda Ngcobe, hereby make oath and declare in English as follows: -

1. I am an adult female employed as an Inspector by the Cape of Good Hope Society for the Prevention of Cruelty to Animals ("SPCA") at c/o First Road and 1st Avenue, Grassy Park, Cape Town with contact telephone/s 021 700 4158/9.
2. The facts contained in this affidavit fall within my personal knowledge unless indicated otherwise or unless it appears so from the context. The facts are also, to the best of my knowledge and belief, both true and correct.
3. On this day, 17 September 2025 at approximately 10:40, I received a message from the controllers informing me of a vagrant man who had been apprehended in possession of protected species - ten angulate tortoises - without a permit at the following coordinates: 33°34'12.1"S 18°28'54.3"E, Witsand Atlantis.
4. Upon arrival on scene at approximately 11:43, I met with members of the City of Cape Town, namely Ntlahla Nomsobo, Luke Linde from Cape Nature, as well as members of Law Enforcement. They briefed me on their findings and explained what had occurred.
5. They informed me that during their patrol

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of the nature reserve, they found the suspect - later identified as Mr. Salie Jacobs (ID: 7719105068082) - in possession of ten (10) angulate tortoises. The tortoises were found confined in a basket which severely restricted their movement, stacked on top of each other, restricted their movement, with no access to water. The living environment inside the basket and around it was extremely dirty, with accumulated debris and faeces.

6. Upon inspection:

- a) two tortoises were found dead beneath the others.
- b) Several were found infested with ticks.
- c) One tortoise escaped.
- d) The remaining nine tortoises were confiscated by Cape Nature with OB no: 1880/2025 and booked in SAPS 13/2613/2025. They then surrendered to the SPCA.

7. I hereby wish to lay charges of Animals Cruelty in terms of Sections 2(1)(a), (b), (c), (e), (g) and (r) of the Animals Protection Act no 71 of 1962 against Mr. Salie Jacobs (ID: 7719105068082) for:

- Ill-treating the tortoises;
- Failing to provide them with veterinary treatment, adequate water and shelter;
- Confining and securing them unnecessarily under conditions and in a manner that caused them unnecessary suffering.

8. I know and understand the contents of this declaration.

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I have no objection to taking the prescribed oath.
I consider the prescribed oath to be binding on my conscience.

Yes

Ek bevestig dat boeiende verklaring deur my
gelees is en dat verklaarder erken dat
hy/sy vertoed is met die inhoud van hierdie ver-
klaring en dit begryp. Hierdie verklaring is
voor my bevestig/bevestig en verklaarder se
handtekening/merk/duimafdruk is in my teen-
woordigheid daarop aangebring.

I certify that the above statement was
read by me and that the deponent has
admitted that he/she knows and understands
the contents of this statement. This statement was
sworn to/affirmed before me and deponent's
signature/mark/thumbprint was placed thereon
in my presence.

to ATLANTIS op 2025-09-17 om 14:26
at on al

[Signature]

(HANDTEKENING) KOMMISSARIS VAN EDE
(SIGNATURE) COMMISSIONER OF OATHS

SANDRINE MADABALALA
VOLLE VOORNAME EN VAN IN DRUKSKRIF
FULL FIRST NAMES AND SURNAME IN BLOCK LETTERS

WESFLEUR CIRCLE

BESIGHEIDSADRES (STRAATADRES)
BUSINESS ADDRESS (STREET ADDRESS)

ATLANTIS

CONSTABLE

RANG/RANK

SA POLISIEDIENS
SA POLICE REF