



AFFIDAVIT

I, the undersigned

MOHGAMAD YAASEEN ABRAHAMS
(ID 9807065122086)

Do hereby make oath in English and state that:

1. I am an adult male Inspector employed as such by the Cape of Good Hope Society for the Prevention of Cruelty to Animals ("SPCA") at corner of 1st Avenue and First Road, Grassy Park with contact telephone number/s 021 700 4158/9 and with email address inspectorate@spca-ct.co.za.
2. The facts contained herein fall within my personal knowledge, unless the contrary appears from the context or is expressly indicated otherwise, and are, to the best of my knowledge and belief, both true and correct.
3. The Cape of Good Hope SPCA received a complaint alleging that a dog was being kept in poor and unhygienic conditions at a property situated at 15 Bellevliet Road, Observatory, Cape Town.
4. Inspector Nakita Sutter was assigned to investigate the complaint. She attended the property on 25 May 2026, 5 June 2026, and again on 8 June 2026 in an attempt to conduct an inspection. On each occasion, Inspector Sutter was unable to gain access to the property or make contact with any occupants. Contact notices and warning notices were left at the premises requesting that the occupants contact the SPCA.
5. On 9 June 2026, the matter was allocated to me for further investigation and action. On the same day, I attended the property to conduct an inspection. Upon my arrival, I knocked on the front door, announced my presence, and called out to any occupants, but received no response. I observed that the notices previously left at the property had been removed from the front gate.
6. From my vantage point alongside the house, I observed the dog that was the subject of the complaint. The dog appeared to be in fair body condition and was free-roaming within the property. The dog was lying amongst accumulated refuse. I further observed significant quantities of rubbish scattered throughout the yard, together with a large accumulation of old faeces.
7. From where I was standing, I could not observe any shelter or a readily available source of clean drinking water for the dog.
8. Based on my observations, I formed the reasonable belief that the animal's living conditions were unsanitary and potentially detrimental to its welfare. I therefore believed there were sufficient grounds to apply for a warrant to enter the premises for the purposes of inspection and, if necessary, seizure of the animal.

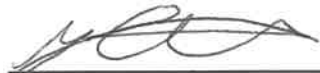
I, **Mohgamad Yaaseen Abrahams**, further state under oath and in English that:

9. On 11 June 2026, I obtained a search and seizure warrant from the Cape Town Magistrate's Court. I proceeded to the property accompanied by members of the City of Cape Town Law Enforcement Department.
10. Upon arrival, I again knocked, announced our presence, and attempted to make contact with any occupants. No one responded.
11. A locksmith, AAA Locksmiths, was contacted to gain lawful access to the premises in execution of the warrant. The front gate and front door were opened without causing damage.
12. We conducted a systematic inspection of the residence to determine whether any persons or additional animals were present. Three rooms within the house were locked. I inspected these rooms through the exterior windows and confirmed that no animals were present inside.
13. Inside one of the accessible rooms, I located one of the warning notices previously issued by the SPCA, confirming that the occupants of the property had received the notices.
14. We then proceeded to the backyard where the dog was located. The dog appeared to be in fair body condition and was free-roaming. I observed that suitable shelter was available in the form of a kennel. A container containing water was present; however, the water was visibly dirty and unsuitable for drinking.
15. The yard itself was in an extremely unhygienic condition. There was a substantial accumulation of old faeces throughout the area together with various hazardous objects, including exposed nails and sharp pieces of metal, which posed a foreseeable risk of injury to the dog.
16. Based on these observations, I formed the opinion that the dog was being kept in conditions contrary to acceptable standards of animal welfare. I therefore seized the dog in terms of the warrant under Seizure Notice No. 02958 and transported the animal to the Cape of Good Hope SPCA for safekeeping.
17. Upon completion of the search, the premises were secured. No damage was caused to the existing locks and no locks were replaced.
18. Copies of the search warrant, founding affidavit, and seizure notice were affixed to the front door of the property.
19. The execution of the warrant and seizure were subsequently reported to Woodstock SAPS and recorded under Occurrence Book (OB) 1142/06/2026.
20. On 15 June 2026, I received a telephone call from Taliku Isaacs (cell number 061 820 8052) regarding Seizure Notice No. 02958.
21. Mr Isaacs advised that he had received the warning notices issued in respect of 15 Bellevliet Road, Observatory, and identified himself as the owner of the dog.
22. He explained that after relocating to another residence, he had left the dog in the care of a man and woman who remained at the property because he was unable to keep the dog at his new residential complex.

I, **Mohgamad Yaaseen Abrahams**, further state under oath and in English that:

23. Mr Isaacs further informed me that the landlord had instructed all occupants to vacate the premises after the sub-landlord allegedly failed to pay the rental agent.
24. On 18 June 2026, Mr Isaacs attended the Cape of Good Hope SPCA to claim the dog.
25. I required him to complete the claimant section of the animal admission documentation and advised him to return on 22 June 2026 with his original identity document or asylum seeker documentation, certified copies thereof, and an affidavit confirming his ownership of the dog.
26. On 22 June 2026, Mr Isaacs failed to return with the required documentation. He was afforded an additional 48 hours to complete the ownership verification process.
27. On 24 June 2026, Mr Isaacs had still not returned to complete the claim process. It was therefore decided that a criminal docket would be prepared. His personal particulars were obtained from the admission documentation completed during his visit to the SPCA.
28. On 29 June 2026, Mr Isaacs had still not completed the ownership verification process.
29. During my previous interaction with him, he admitted that despite having moved from the property, he remained the primary caretaker and owner of the dog. He stated that he visited the property daily to feed and exercise the dog.
30. When questioned about the unhygienic conditions in which the dog was kept, specifically the accumulated faeces and refuse, Mr Isaacs admitted that he had not attended to cleaning the area. When asked whether he had requested the remaining occupants of the property to maintain a clean environment for the dog, he stated that he had not done so.
31. Mr Isaacs further advised that he accepted full responsibility for the condition in which the dog had been kept and understood the potential legal consequences of his actions.
32. Subsequent attempts to contact Mr Isaacs telephonically have been unsuccessful.
33. Mr Isaacs identified himself as an asylum seeker and advised that his current residential address is 21 Hely Street, Maitland.
34. Based on my investigation and the admissions made by Mr Isaacs, I am of the opinion that there are reasonable grounds to believe that he contravened section 2(1)(e) of the Animals Protection Act 71 of 1962 by permitting the dog to be kept in dirty and unhygienic living conditions.
35. I respectfully request that the City of Cape Town Law Enforcement Department issue Mr Taliku Isaacs with the appropriate infringement notice for contravening section 2(1)(e) of the Animals Protection Act 71 of 1962.
36. **I know and understand the content of this declaration.**
I have no objection to taking the prescribed oath.
I consider the prescribed oath to be binding on my conscience.

I, **Mohgamad Yaaseen Abrahams**, further state under oath and in English that:



DEPONENT

The deponent has acknowledged that he knows and understands the contents of this affidavit/declaration, which was signed and sworn to before me at GRASSY PARK on this the 23 day of JULY 2026, 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.



J De Vos
40004230

COMMISSIONER OF OATHS

Full names:

Designation:

Business address:



JUSTIN DE VOS

COMMISSIONER OF OATHS
Peace Officer - Law Enforcement
City of Cape Town Sta No. 40004230
101 Old Strandfontein Rd, Ottery, Cape Town, 7808

CITY OF CAPE TOWN
23 JUL 2026
LAW ENFORCEMENT