

**IN THE HIGH COURT OF SOUTH AFRICA KWAZULU-NATAL LOCAL DIVISION,
HELD AT DURBAN**

CASE NO. : 13149/17

In the matter between:

KOOBENDRAN SAMIE

Applicant

and

SECONA FREIGHT LOGISTICS CC.

First Respondent

**CATO MANOR INDIAN CEMETERY AND
CREMATORIUM ASSOCIATION**

Second Respondent

ETHEKWINI MUNICIPALITY

Third Respondent

**HEAD OF DEPARTMENT: ECONOMIC
DEVELOPMENT, TOURISM AND ENVIRONMENTAL
AFFAIRS: KWAZULU-NATAL**

Fourth Respondent

**MEC FOR ECONOMIC DEVELOPMENT,
TOURISM AND ENVIRONMENTAL AFFAIRS:
KWAZULU-NATAL**

Fifth Respondent

**CHIEF DIRECTOR: KWAZULU-NATAL
DEPARTMENT OF WATER AND SANITATION**

Sixth Respondent

MINISTER FOR WATER AND SANITATION

Seventh Respondent

AMAFA AKWAZULU-NATALI

Eighth Respondent

**SOUTH AFRICAN HERITAGE RESOURCES
AGENCY**

Ninth Respondent

FOUNDING AFFIDAVIT

I, the undersigned

KOOBENDRAN SAMIE

do hereby make oath and say:

1.

I am the applicant in this matter, an adult male of Indian origin, resident at Yellowwood Park, Durban and currently employed as a senior environmentalist with the Environmental Planning and Climate Protection Department of the eThekweni Municipality and stationed at room 200, 2nd floor, City Engineers Building, 166 KE Masinga Road, Durban, 4001.

2.

I confirm that the facts deposed to below are within my own personal knowledge, except where the context suggests otherwise.

3.

I depose to this affidavit in support of this application in my private capacity and in the public interest.

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The Parties

4.

The first respondent is SECONA FREIGHT LOGISTICS CC., a close corporation duly registered in terms of the Close Corporation Act 69 of 1984, with its registered address at suite 7, Dicks Centre, 13 Arbee Drive, Tongaat, 4400, and is currently conducting its business on erf 329 Cato Manor, located at 21 Wenlock Road, Cato Manor, Durban.

5.

The second respondent is the CATO MANOR INDIAN CEMETERY AND CREMATORIUM ASSOCIATION which is the registered owner of the property described as erf 329 Cato Manor, located at 21 Wenlock Road, Cato Manor, Durban, (hereinafter referred to as the "site") and whose full and further particulars are to the applicant unknown.

6.

The third respondent is the ETHEKWINI MUNICIPALITY, a category A municipality as defined in Section 155(1) of the Constitution of the Republic of South Africa and duly established in terms of Section 12 of the Local Government: Municipal Structures Act 117 of 1998. The Municipality is charged *inter alia* with regulating the use and development of land within its jurisdiction, and is further mandated to administer s31A of the Environment Conservation Act 73 of 1989, whereby it may direct any person who causes damage to the environment, to cease such activity and take such steps to eliminate, reduce or prevent such environmental damage.

7.

The fourth respondent is the HEAD OF DEPARTMENT: ECONOMIC DEVELOPMENT, TOURISM AND ENVIRONMENTAL AFFAIRS: KWAZULU-NATAL who is cited in her official capacity, and who, together with the fifth respondent is responsible for administering the National Environmental Management Act 107 of 1998 (NEMA).

8.

The fifth respondent is the MEC for ECONOMIC DEVELOPMENT, TOURISM AND ENVIRONMENTAL AFFAIRS: KWAZULU-NATAL, who is cited in his official capacity.

9.

The sixth respondent is the CHIEF DIRECTOR for KWAZULU-NATAL for the DEPARTMENT OF WATER AND SANITATION and is cited in his official capacity, and who, together with the seventh respondent, is responsible for administering the National Water Act 36 of 1998 (NWA).

10.

The seventh respondent is the MINISTER for WATER AND SANITATION and is cited in her official capacity.

11.

The eighth respondent is AMAFA AKWAZULU-NATALI, the provincial heritage conservation agency for KwaZulu Natal, duly established as a statutory body in terms of Section 5 of the KwaZulu-Natal Heritage Act 4 of 2008, charged with the

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identification; conservation; protection; and administration, of the physical and living or intangible heritage resources of the province of KwaZulu-Natal.

12.

The ninth respondent is the SOUTH AFRICAN HERITAGE RESOURCES AGENCY, a statutory body duly established in terms of Section 11 of the National Heritage Resources Act 25 of 1999, as the national administrative body responsible for the protection of South Africa's heritage resources which are of cultural significance or other special value for the present community and for future generations.

Jurisdiction

13.

The site is located within the jurisdiction of this court and the whole cause of action arose within the jurisdiction of this court. In addition, the applicant and the first, second and third respondents are located within the jurisdiction of this court. I therefore respectfully submit that this Honourable Court has jurisdiction to determine this application.

The Site

14.

The site is owned by the Second Respondent, THE CATO MANOR INDIAN CEMETERY AND CREMATORIUM ASSOCIATION, which site was historically used as a cemetery and crematorium. A copy of the Deeds Office Document accessed through "windeed" is attached hereto as ANNEXURE A as confirmation of ownership.

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15.

From a young age I have known the site to be a cemetery. I regard the site as important from a heritage and historical point of view, as well as an important reflection of the history and culture of the people of Indian origin in South Africa. The area of Cato Manor and in particular Bellair Road (Vusi Mzimela Road) has numerous buildings and temples of historical, cultural and heritage significance. These include, the Umbilo Shri Ambalavanaar Alayam Temple (declared a national monument), the Shree Gengaiamman Temple, the Shri Muthilinganatha Easperar Alayam (located directly opposite the site), the Shri Poongavana Amman Temple, and the recently built Cato Manor Museum which has been built around the tomb of Queen Thomozile Jezangani kaNdwandwe Zulu, King Goodwill Zwelithini's mother. The site is therefore located in an area rich in cultural history of the Indian and African people of South Africa.

16.

The site is approximately 2 hectares in extent and is currently zoned PUBLIC OPEN SPACE RESERVATION. A copy of the certificate confirming the zonation as issued by the third respondent is attached hereto as ANNEXURE B.

17.

The site also falls within the Durban Metropolitan Open Space System (DMOSS). D'MOSS is a system of open spaces, some 74 000 ha of land and water, that incorporates areas of high biodiversity value linked together in a viable network of open spaces.¹ In addition, the site is located within the 1:100 year flood plain. The

¹

http://www.durban.gov.za/City_Services/development_planning_management/environmental_planning_climate_protection/Durban_Open_Space/Pages/-What-is-the-Durban-Metropolitan-Open-Space-System.aspx. Accessed 26th September 2017.

UMKUMBAAN RIVER flows through the south-east corner of the property. I attach an aerial photo of the site indicating the above attributes, sourced from the third respondent, as ANNEXURE C.

18.

The site is currently occupied by the first respondent which operates a container depot for the handling, storage and repairs to freight containers. Photographs of the site are attached hereto as ANNEXURE D.

The Applicable Law

19.

The KwaZulu-Natal Planning and Development Act 6 of 2008 (PDA) applies to all "development" in the province of KwaZulu-Natal, which term is defined in section 1 as:

"in relation to any land, ... the erection of buildings and structures, the carrying out of construction, engineering, mining or other operations on, under or over land, and a material change to the existing use of any building or land for non-agricultural purposes "

20.

In terms of s75(1) of the PDA, a person is guilty of an offence-

- a) *when developing, subdividing or consolidating land contrary to a provision of a scheme;*
- c) *when developing land without prior approval in terms of this Act;*

21.

In terms of clause 10 dated 09/12/2009, of the Durban Town Planning Regulations (Durban Central Scheme):

(4) (a) *No person shall within a D'MOSS controlled area...develop any land, or excavate or level any site, or remove any natural vegetation from, or erect any structure of any nature whatsoever, dump on or in or carry out any work upon such site without having first obtained the prior approval in terms of this sub-clause.*

(b) *No such approval shall be given unless the Head : Development Planning Environment and Management..., is satisfied that any such development...can be carried out without materially and/or temporarily degrading, destroying or negatively impacting on the integrity of the biodiversity and/or environmental goods and services found or generated within the said area.*

22.

In terms of clause 3 dated 28/10/2010 of the Durban Town Planning Regulations (Durban Central Scheme):

(1) (a) *The several pieces of land coloured dark green on the map are reserved for public open space purposes...*

(2) *Save with the special consent of the Council, no person shall erect a building or make excavations or execute any other work on land reserved in terms of sub-clause (1) hereof, or spoil or waste or otherwise use such land so as to destroy or impair its use for the purpose for which it is reserved...*

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23.

In terms of section 33 of the KwaZulu-Natal Heritage Act 4 of 2008 (KZNHA):

- (3) (a) No structure which is, or which may reasonably be expected to be older than 60 years, may be demolished, altered or added to without the prior written approval of the Council having been obtained on written application to the Council.

24.

In terms of s34 of the KZNHA:

No person may damage, alter, exhume, or remove from its original position—

- (a) the grave of a victim of conflict;*
- (b) a cemetery made up of such graves; or*
- (c) any part of a cemetery containing such graves, without the prior written approval of the Council having been obtained on written application to the Council.*

25.

S35 of the KZNHA provides that :

- (1) *No grave—*
 - (a) not otherwise protected by this Act; and*
 - (b) not located in a formal cemetery managed or administered by a local authority,*
may be damaged, altered, exhumed, removed from its original position, or

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otherwise disturbed without the prior written approval of the Council having been obtained on written application to the Council.

26.

In terms of section 15 of the KwaZulu-Natal Cemeteries and Crematoria Act 12 of 1996 (KZNCCA):

(1) Any place which is generally accepted by the local community as being a cemetery or crematorium and which is in existence on the date on which this Act takes effect shall be deemed to have been established in terms of this Act.

27.

Section 19 of the KZNCCA regulates the use of a cemetery or crematorium for other purposes:

(1) The land on which a cemetery or crematorium has been established shall not, without the prior approval of the Minister, be used for any purpose other than a cemetery, crematorium or memorial to deceased persons.

(2) An approval contemplated in subsection (1) shall not be granted until -

a) in the case of a cemetery or portion of a cemetery -

(i) all human remains contained in the graves comprising such cemetery or portion of such cemetery have been exhumed and re-interred elsewhere or cremated;

(ii) any condition by imposed by the Minister has been complied with;

or

- b) *in the case of a crematorium, all memorials and the ashes of cremated human remains have been relocated or otherwise disposed of to the satisfaction of the Minister.*

28.

Section 31 of the KZNCCA provides that:

Any person who -

- (d) *contravenes or fails to comply with any provision of this Act or of the regulations made thereunder, shall be guilty of an offence and shall be liable on conviction to a fine or to imprisonment for a period not exceeding five years or to both such fine and such imprisonment.*

29.

In terms of s36 of the National Heritage Resources Act 25 of 1999 (NHRA):

- (3) *No person may, without a permit issued by SAHRA or a provincial heritage resources authority -*
 - (a) *destroy, damage, alter, exhume or remove from its original position or otherwise disturb the grave of a victim of conflict, or any burial ground or part thereof which contains such graves;*
 - (b) *destroy, damage, alter, exhume, remove from its original position or otherwise disturb any grave or burial ground older than 60 years which*

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is situated outside a formal cemetery administered by a local authority...

30.

Section 51 of the NHRA provides that:

(1) ...any person who contravenes ...s36(3) is guilty of an offence and liable to a fine or imprisonment or both such fine and imprisonment...as set out in item 2 of the Schedule;

(item 2 of the Schedule):

A fine or imprisonment for a period not exceeding three years or to both such fine and imprisonment

31.

The term "environment" is defined under section 1 of the National Environmental Management Act 107 of 1998 (NEMA) as:

...the surroundings within which humans exist and that are made up of-

- (i) the land, water and atmosphere of the earth;*
- (ii) micro-organisms, plant and animal life;*
- (iii) any part or combination of (i) and (ii) and the interrelationships among and between them; and*
- (iv) the physical, chemical, aesthetic and cultural properties and conditions of the foregoing that influence human health and well-being;*

32.

Section 28 of NEMA provides that:

(1) *Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment.*

(2) *Without limiting the generality of the duty in subsection (1), the persons on whom subsection (1) imposes an obligation to take reasonable measures, include an owner of land or premises, a person in control of land or premises or a person who has a right to use the land or premises on which or in which-*

(a) *any activity or process is or was performed or undertaken; or*

(b) *any other situation exists,*

which causes, has caused or is likely to cause significant pollution or degradation of the environment.

33.

In terms of s49A of NEMA:

(1) *A person is guilty of an offence if that person—*

(e) *unlawfully and intentionally or negligently commits any act or omission which causes significant pollution or degradation of the environment or is likely to cause significant pollution or degradation of the environment;*

(f) unlawfully and intentionally or negligently commit any act or omission which detrimentally affects or is likely to detrimentally affect the environment;

34.

The National Water Act 36 of 1998 (NWA) regulates the use of water, and such use, in terms of s21 of the Act, includes:

(c) impeding or diverting the flow of water in a watercourse;

(i) altering the bed, banks, course or characteristic of a watercourse;

35.

Section 22 of the NWA provides that:

(1) A person may only use water –

(a) without a licence –

(iii) if that water use is permissible in terms of a general authorisation issued under section 39;

(b) if the water use is authorised by a licence under this Act...

36.

Section 151 of the NWA provides that:

(1) No person may –

(a) use water otherwise than as permitted under this Act;

(j) unlawfully and intentionally or negligently commit any act or omission which detrimentally affects or is likely to affect a water resource;

(2) Any person who contravenes any provision of subsection (1) is guilty of an offence and liable, on the first conviction, to a fine or imprisonment for a period not exceeding five years, or to both a fine and such imprisonment and, in the case of a second or subsequent conviction, to a fine or imprisonment for a period not exceeding ten years or to both a fine and such imprisonment.

37.

In terms of regulation 2 of the general authorisation (GA) promulgated in terms of section 39 of the NWA for water uses as defined in section 21(c) or section 21(i), and as contained in General Notice 509 in Government Gazette 40229 dated 26 August 2016, the "regulated area of a watercourse" is defined as:

(a) The outer edge of the 1 in 100 year flood line and/or delineated riparian habitat, whichever is the greatest distance, measured from the middle of the watercourse of a river, spring, natural channel, lake or dam;

38.

The purpose of the GA as contained in regulation 1 of the said GA, is to replace the need for a water user to apply for a licence in terms of the NWA provided that the water use is within the limits and conditions of the GA.

39.

The provision of the GA, in terms of regulation 3, do not apply to:

(b) to the use of water in terms of section 21(c) or (i) of the Act within the regulated area of a watercourse where the Risk Class is Medium or High as determined by the Risk Matrix...

40.

In terms of section 15 of the Constitution of the Republic of South Africa (the Constitution):

(1) Everyone has the right to freedom of conscience, religion, thought, belief and opinion.

41.

Section 24 of the Constitution provides that:

Everyone has the right –

(a) to an environment that is not harmful to their health or well-being; and

(b) to have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that –

(i) prevent pollution and ecological degradation;

(ii) promote conservation; and

(iii) secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development.

42.

Section 31 of the Constitution provides that:

- (1) Persons belonging to a cultural, religious or linguistic community may not be denied the right, with other members of that community –*
- (a) to enjoy their culture, practise their religion and use their language...*

The Facts

43.

From about 2009 until present I observed on a number of occasions the infilling and dumping of rubble and soil material, the storage and parking of fuel tankers, trucks and later on, the storage of shipping containers on the said site.

44.

On the 7th August 2013, I sent a complaint regarding the matter to Vanessa Maclou, District Manager for Durban, employed by the fourth respondent, and Mkhanyisi Cele, Biodiversity Enforcement Officer (Environmental Planning and Climate Protection), employed by the third respondent. Then on the 8th August 2013 I submitted a complaint form to Janine Isaac, an Environmental Management Inspector employed by the fourth respondent regarding the activities on the site. I attach a copy of the various correspondence marked ANNEXURE E.

45.

On the 21st of January 2014 I reported the matter to Eric Parker, a Regional Co-ordinator (Land Use Management), employed by the third respondent. I attach a copy of the email as ANNEXURE F.

46.

On 27th January 2014, I reported the matter to Bernadet Pawandiwa, Senior Heritage Officer employed by the eighth respondent. Then on the 17th March 2014 I received a response to my previous complaint. I attach a copy of the correspondence as ANNEXURE G.

47.

On or about the first week of March 2014, during the day, I observed further infilling of the northern part of the site (closer to Vusi Mzimela Road) with soil or rubble. This area (northern part of site) was leveled and compacted and containers were being stored or stacked thereon.

48.

In April 2014 I opened a criminal case at the Cato Manor Police Station and was issued with the case number CAS 134/04/2014. On the 29th September 2015 I was called by the investigating officer, a warrant officer Israel from the Cato Manor Detective Unit, who told me that the case was provisionally withdrawn. I received a call later that day by the prosecutor, advocate Waldo Smit, confirming the provisional *nolle prosequi*. I do not recall being given reasons for the decision.

49.

On the 24th of June 2014 I sent a complaint to the National Environmental Crimes Hotline via email. I received no response. I attach a copy of the complaint as ANNEXURE H.

50.

On the 16th February 2015 I sent a complaint to the National Department of Water and Sanitation enforcement hotline via email. I received no response. I attach a copy of the complaint as ANNEXURE I.

51.

On the 6th October 2015 I had a meeting with officials of the fourth respondent to discuss my complaint and find out the status of the investigation based on my complaint. They undertook to take some form of enforcement action. I received no further response from the officials thereafter.

52.

On the 10th April 2016, I started a Facebook Page entitled SAVE THE CATO MANOR INDIAN CEMETERY. I posted a comment on the Premier of KwaZulu-Natal's Facebook Page and the spokesperson Ndabezinhle Sibiyi contacted me to provide assistance. The officials from the Premier's office thereafter undertook to investigate, but eventually, after a few email responses, no further investigations were done and I received no further response. I attach a copy of the correspondence with the Premier's Office as ANNEXURE J.

53.

On the 22nd August 2016 I wrote to Sibongile Dlamini, Regional Co-ordinator (Environmental Planning and Climate Protection), employed by the third respondent, and I requested that the matter be further investigated. I received no further information or updates on my complaint thereafter. I attach a copy of the correspondence as ANNEXURE K.

53.

On the 25th August 2016 I wrote to the sixth respondent and reminded him of my previous complaint to the enforcement hotline in 2015. The matter was then referred to Kethiwe Methula, an enforcement officer employed by the sixth respondent. After initial investigations and report-backs were done, I received no further response from the officials thereafter. I attach a copy of the correspondence as ANNEXURE L.

54.

On the 19th September 2016 I met with the Deputy Mayor, eThekweni, councillor Fawzia Peer to enlist her help in the matter. She promised to engage with the second respondent. I received no further response from the deputy mayor or her office. I attach a copy of the correspondence as ANNEXURE M.

55.

On or about the 23rd April 2017 I started a petition on the website www.change.org. A number of people came forward to indicate that their family members were buried on the site. The petition was sent to all the respondents, including the provincial and National Ministers for Arts and Culture and the National Minister for Environmental

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Affairs. No responses were received. I attach a copy of the petition documents as ANNEXURE N.

56.

On the 18th June 2017 I submitted the petition and a complaint to the South African Human Rights Commission (SAHRC). They acknowledged receipt of the complaint. I attach a copy of the acknowledgement letter as ANNEXURE O. On the 11th August 2017 I met the case officer Benjamin Ntombela to discuss the complaint. Thereafter, I received no further response from the SAHRC.

57.

On the 3rd July 2017 I wrote to the fourth respondent requesting her to take action in terms of s28 of NEMA, and further giving her notice in terms of s28(12) of NEMA. I attach a copy of the correspondence as ANNEXURE P. Thereafter, on the 20th July 2017, an onsite meeting was held with officials of the third and fourth respondents, wherein Vanessa Maclou (District Manager employed by the fourth respondent), undertook to take the necessary enforcement action against first and second respondents. Thereafter, I received no further response regarding the matter.

58.

On or about the 15th August 2017 I reported the matter as a heritage crime to the ninth respondent by entering information on their website: <http://www.sahra.org.za/sahris/>. I received the case ID 11509.

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59.

On 28th September 2017 I sent email correspondence to Nkosazana Machete (Heritage Inspector) and Simphiwe Mome (Legal Advisor) and Clinton Jackson (Manager: National Inventory Unit), all of whom were employed by the ninth respondent. The email requested feedback on my previous complaint and requested them to urgently investigate the matter. I received no further response from the said officials. I attach a copy of the correspondence as ANNEXURE Q.

The Unlawful Conduct of the First and Second Respondents

60.

The first respondent currently occupies and carries out operations on the said site. The mere presence of the first respondent and its activities and operations thereon, infringes on a number of constitutional rights, specifically section 24 and 31 of the Bill of Rights. The first respondent's continued presence on the site not only poses further damage and harm to environmental resources on and associated with the site, but also desecrates and degrades the historical, heritage and cultural value of the site. The first respondent's continued presence, operations and activities on the site, denies the Indian community of South Africa the right to not only sustain and enjoy their history and culture, but also to protect and conserve their heritage and remnants thereof.

61.

The second respondent, as registered owner of the site, and custodian of the site and its resources, has failed in its obligation to prevent the damage to and degradation of the site. It too, has infringed on the aforementioned constitutional rights.

62.

The first respondent does not have any lawful authorisations to occupy or carry out operations on the site. The first respondent's activities on the site are contrary to the eThekweni (Durban) town planning scheme and the first respondent's operations on the site are therefore unlawful in terms of the PDA.

63.

The second respondent does not have any lawful approvals in terms of the PDA for the current operations on the site. The second respondent did not have any lawful approvals in terms of the PDA when vegetation on the site was removed, and soil and rubble was dumped on the site. The conduct of the second respondent is therefore unlawful.

64.

The second respondent has no lawful approvals in terms of the KZNCCA, the KZNHA or the NHRA for the destruction or removal of graves and tombstones on the site. Furthermore, the first and second respondents have no lawful authorisations in terms of the NEMA and the NWA for any of the activities which took place or are currently taking place on the site.

65.

The first and second respondents have a duty in terms of s28 of NEMA to stop the offensive operations on site and to rectify the damage caused to the said site and its resources, and they have failed to do so. The conduct of the first and second

respondents are thus unlawful and have due to their actions or omissions, caused significant damage to the environment.

Locus standi

66.

I submit that I have *locus standi* by virtue of s38 of the Constitution as well as s32(1) of NEMA. My constitutional rights and those of the public, and in particular the Indian community of South Africa as enshrined in sections 15, 24 and 31 of the Constitution are, and have been, infringed.

Interdict Requirements

67.

I submit that I have a clear right to have the first and second respondents interdicted and restrained from commencing or continuing with any activity on site, and to have the damage caused to the site rectified and rehabilitated at their own expense; and to have the site and its resources protected for posterity.

68.

The past and current conduct of the first and second respondents on the site shows clear disregard for the law and our constitutional rights. There can be no justification for the actions or inactions of the first and second respondents, which have led to the damage to important environmental and historical resources. The conduct of the first and second respondents amount to an ongoing injury.

69.

I have attempted to seek alternative ordinary remedies from the various mandated authorities since 2013, and by contacting and complaining to all the respondents. In addition, I have started a Facebook Page and a petition on the Change.Org website, to compel authorities to act. I have also approached the Deputy Mayor of the third respondent, the Premier of KwaZulu-Natal and the South African Human Rights Commission. To date no action has been taken against the first and second respondents, or alternatively, I have not been informed thereof, and the status quo remains.

70.

In light of the first and second respondents' blatant disregard for the law, the environment, and the South African Indian Community's history, heritage and culture; and in light of the persistent failure by Government authorities to protect and defend our constitutional rights, I have no other choice but to seek the Court's intervention.

Conclusion

71.

WHEREFORE, I humbly pray that this Honourable Court will grant the relief as set out in the Notice of Motion prefixed hereto.



KOOBENDRAN SAMIE

I certify that the deponent has acknowledged that he knows and understands the contents of this affidavit which was sworn to and signed before me at Dun North on this 6th day of November 2017, the regulations contained in Government Notice No. R.1258 dated 21 July 1972 having been complied with.

SOUTH AFRICAN POLICE
COMMUNITY SERVICE CENTRE
2017 - 11 - 07
DURBAN NORTH
REPUBLIC OF SOUTH AFRICA

[Handwritten signature]

COMMISSIONER OF OATHS
Northcote P Stodi
Durban North SAPS.