

IN THE CONSTITUTIONAL COURT OF SOUTH AFRICA

CASE NO: CCT 40/2015

In the matter between:

THE MATABANE COMMUNITY First Applicant

THE MAPHARI COMMUNITY Second Applicant

MLUNGISI AND EZIBELENI DISADVANTAGED GROUP Third Applicant

THE LADY SELBORNE CONCERNED GROUP Fourth Applicant

and

LAND ACCESS MOVEMENT OF SOUTH AFRICA First Respondent

ASSOCIATION FOR RURAL ADVANCEMENT Second Respondent

NKUZI DEVELOPMENT ASSOCIATION Third Respondent

MODDERVLEI COMMUNAL PROPERTY ASSOCIATION Fourth Respondent

MAKULEKE COMMUNAL PROPERTY ASSOCIATION Fifth Respondent

POPELA COMMUNAL PROPERTY ASSOCIATION Sixth Respondent

CHAIRPERSON OF THE NATIONAL COUNCIL OF PROVINCES Seventh Respondent

AND THIRTEEN OTHERS Eighth to Twentieth Respondents
(Second to Fourteenth Applicants in main application)

In re the matter between:

Case no: CCT 40/2015

LAND ACCESS MOVEMENT OF SOUTH AFRICA First Applicant

AND FIVE OTHERS Second to Sixth Applicants

-and-

**CHAIRPERSON OF THE NATIONAL COUNCIL
OF PROVINCES** First Respondent

AND THIRTEEN OTHERS Second to Fourteenth Respondents

FOUNDING AFFIDAVIT

I, the undersigned,

MARABANE ELIAS MTSHWENI

hereby make oath and state:

1. I am an adult male of stand 861, Zaaiplaas, district Groblersdal and the nominated representative of the land claims committee of the Matabane Community, the First Applicant in this matter.

2. The facts herein fall within my personal knowledge unless otherwise stated or apparent and are both true and correct.
3. I am duly authorised to depose to this affidavit on behalf of the First Applicant Community. This is an application for joinder.

THE PARTIES

First Applicant

4. The First Applicant is a traditional African community that historically lived in the Groblersdal area in Limpopo.
5. The Applicant community and its members were dispossessed of the land they occupied and owned in indigenous context as I elaborate on more fully below. The community, despite being scattered have remained a community with a common identity through the continued practice of our traditional customs and ceremonies in community context. More specifically, we have remained a community united by our wish to have our indigenous land restored to us.

6. As a result, we lodged a community claim in the name of the Matabane community prior to the first cut-off date of 31 December 1998 in terms of the Restitution of Land Rights Act 22 of 1994 (the Restitution Act). I annex the claim form hereto as annexure “ST1”.

7. As I elaborate on below, we have been advised that individual members of our community should also have lodged claims as individuals, and that the re-opening of the claims process should be used to lodge all these individual claims. Approximately two hundred such individual claims will be lodged, being the number of households in the community.

8. First Applicant and its members will therefore be seriously negatively affected if any of the relief sought in the notice of motion in the main application is granted, especially paragraph 6.3 of the Notice of Motion. I therefore respectfully submit that the First Applicant has locus standi in this matter to act in its own interests, the interests of its members and all other communities similarly placed.

Second Applicant

9. Second Applicant is the Maphari community, a traditional community of the Waterpoort area, just north of the Soutpansberg mountains in Limpopo.

10. Second Applicant is duly represented herein by Mr Stephens Maphari, the chairperson of the land claims committee of the Second Applicant. For the facts in this affidavit which relate to the Second Applicant community, I refer to the confirmatory affidavit of Mr Stephens Maphari, annexed hereto.

11. The Second Applicant is a community that did not lodge a land claim in terms of the Restitution Act in their own name prior to 31 December 1998, due to the fact that they received incorrect legal advice at the time, as a result of which their claim was incorporated into another community claim.

12. Second Applicant community therefore wants to make use of the re-opening of the claim period to lodge a claim in their own name

over the land which they occupied as a traditional community before their dispossession.

13. Second Applicant and its members will therefore be seriously negatively affected if any of the relief sought in the notice of motion in the main application is granted. I therefore respectfully submit that the Second Applicant has locus standi in this matter to act in its own interests, the interests of its members and all other communities similarly placed.

Third Applicant

14. Third Applicant is the Mlungisi and Ezibeleni Disadvantaged Group. The facts in respect of the Third Applicant and its members are confirmed by the chairperson of the Third Applicant Mr Zwelakhe Hani in his confirmatory affidavit attached hereto.
15. Third Applicant is a voluntary organisation that represents a large number of persons who live in either Mlungisi or Ezibeleni Township, in the local municipality of Lukhanji, Chris Hani district, Eastern Cape Province. Its members are all persons who were entitled to claim restitution of rights in land in terms of the

Restitution Act prior to 31 December 1998, but failed to do so for the reasons set out below.

16. The members of the Third Applicant are all persons who have so-called individual urban claims, in other words, the rights in land originally dispossessed were urban erven or other types of urban tenements that were owned by or allocated to individuals.
17. The members of the Third Applicant were all victims of a forced removal in 1974 in which residents of Mlungisi township next to Queenstown were moved to Ezibeleni in the former Transkei and other areas in the former Transkei and Ciskei.
18. Although the Third Applicant does not have a formal written constitution, it is an organisation with an identifiable membership that meets regularly, has a functioning executive committee and advocates around the single issue of the re-opening of the restitution claims. It has done so since 2004. For purposes of the subject matter of this litigation, Third Applicant should have the necessary *locus standi* in these proceedings.

Fourth Applicant

19. Fourth Applicant is the Lady Selborne Concerned Group, a voluntary association that represents some 125 (one hundred and twenty five) persons who were also entitled to claim restitution of land rights in terms of the Restitution Act, but failed to do so before 31 December 1998 for the reasons that appear below. As with so many other communities and individuals, they received incorrect legal advice prior to 31 December 1998.
20. The facts in respect of Fourth Applicant are confirmed by Mr Hans Cecil Letladi Ntsoko, the chairperson of the Fourth Applicant, in his annexed confirmatory affidavit.
21. The Lady Selborne claims are also urban based individual claims.
22. The Fourth Applicant also has the necessary *locus standi* in these proceedings. It is a voluntary organisation with an identifiable membership that meets regularly and which serves its members by advancing the rights and interests of its members, being a specific group of occupiers in the erstwhile township of Lady Selborne,

some seven kilometres northwest of the Pretoria central business district.

THE PURPOSE OF THIS APPLICATION

23. The purpose of this application is to join First to Fourth Applicants in this application as Fifteenth to Eighteenth Respondents in the main application in which the main Applicants:

23.1 challenge the constitutionality of the parliamentary proceedings in terms of which the Restitution of Land Rights Amendment Act 15 of 2014 (the amendment act) was passed (prayers 1 and 2). I refer to this as the first issue; and

23.2 seek in the alternative direct access to challenge the constitutionality of section 6(1)(g) of this amendment Act, and in consequence, an order that interdicts the Commission for the Restitution of Land Rights to investigate or process any of the new land claims lodged

in terms of the amendment act (prayers 3, 4,5 and 6.1 to 6.3) I refer to this as the second issue.

- 14 Our participation as Fifteenth to Eighteenth Applicants in the main application will be limited to opposing the relief sought by way of direct access, namely the second issue.

- 15 We make common cause with the First to Fourteenth Respondents in the main application on the first issue, however, we do not have any specific personal knowledge of the legislative processes that eventually led to the passing of the amendment act. We will therefore not participate actively in respect of the first issue.

- 16 As it can be accepted that many other new claimants will be similarly placed as our members, we also intend acting in the interests of all other members of the public that wish to lodge restitution claims in terms of the re-opened process provided for by the amendment act. Fifteenth to Eighteenth Respondents will therefore also act in terms of section 38(c) and (d) of the Constitution.

LIMITED PROCEDURAL PARTICIPATION

- 17 The Applicants, if admitted as Fifteenth to Eighteenth Respondents, do not intend to add to the factual allegations made by the other parties in the main application. We only wish to add the facts alleged in this affidavit.

- 18 A substantial volume of affidavits and annexures have already been filed that deal with the relevant facts. We shall present our arguments based on the record as it stands, save for the fact that we wish the facts alleged herein to be accepted as part of the record. These are the facts that relate to the reasons why the Maphari as a community, the individual members of the Matabane community and the members of the Third and Fourth Applicants (in this application) did not lodge land claims prior to 31 December 1998. These facts are dealt with in this affidavit, and they need not be expanded on any further.

- 19 We respectfully submit that these facts fall within our own personal knowledge and cannot be controverted. If, however, any of the other parties wish to answer these allegations, it would be a simple matter

for them to respond thereto in the time allowed for answering this affidavit.

20 I respectfully submit that it is not feasible to analyse the vast volume of facts already placed before this court by the Applicants in the main application and the participating organs of state.

21 The allegations relevant to the second issue, are those that deal with the long delays in the processing of existing claims, the lack of resources committed to the restitution process and the fears that the new claims will create even further delays.

22 We therefore submit that there is sufficient time until the hearing set for this matter on 20 August 2015 to accommodate our joinder and limited procedural participation.

23 Paragraph 3 of the Notice of Motion in this application is therefore framed in a manner that limits the directions we seek to the filing of heads of argument and presentation of oral argument. We do not wish to file any further affidavits in the main matter.

24 By this limited participation, we do not concede that the second issue can or should be dealt with by way of direct access. As I point out below, we oppose the application for direct access both on the merits of the relief sought as well as on the basis that this is not an appropriate matter to be heard by way of direct access. It is essential that the views of the Land Claims Court and the Supreme Court of Appeal be heard in this matter.

25 The issue of direct access is mostly a legal issue, and to the extent that it involves the facts of the case, such facts are adequately dealt with by the Twelfth to Fourteenth Respondents in their answering affidavits.

BACKGROUND FACTS AND REASONS FOR NOT LODGING CLAIMS BEFORE 31 DECEMBER 1998

First Applicant

26 The historical dispossession of the Matabane community of its indigenous ownership of its land, is something which is well known in our oral tradition, and an injustice that we have never forgotten.

27 Although we have remained a single community through the practice of our traditions and the gathering of our members for traditional ceremonies, our community will never be whole again until we have our land returned to us. I am advised that it is not necessary for purposes of this application to explain further the integral link between traditional communities and their land.

28 As a result of the importance of seeking the return of our ancestral land, we lodged a land claim over our land as appears from "ST1".

29 At the time, we were not legally represented, and relied on the advice that we received from the officials of the Commission on the Restitution of Land Rights. They assisted us in lodging the claims.

30 We have since obtained legal representation. We are advised that, as a result of law developed by the Land Claims Court, many believe that community claims and individual claims are mutually excluding, although the issue is probably not finally settled.

31 We are further advised that some parts of our ancestral lands may very well have been dispossessed prior to 19 June 1913, and that it

may as a result be precluded by the Restitution Act. Again, it is not possible to make any final assessment of this aspect, but it would be prudent to consider this aspect of our claim.

32 As a result we have been advised that individual members of our community should also file individual claims on the basis of unregistered rights in land they held as labour tenants. The community claim and the individual claims may then be heard together. We are advised that this is the approach followed in many other claims such as appears from the reported judgment of *Department of Land Affairs v Goedgelegen Tropical Fruits (Pty) Ltd* 2007(6) SA 199 CC at para 2 thereof.

33 It would respectfully be wasteful and irrational to first finalise the community claim, and only thereafter (probably a few years later) deal with the individual claims.

Second Applicant

34 The Second Applicant is an indigenous Venda speaking community from the Waterpoort area, just north of the Soutpansberg mountain range in Limpopo.

35 As was the case with all the indigenous groupings of this area after 1913, they found themselves living on land which the formal law did not recognise as their land. Over a period of time, they and all the surrounding communities were dispossessed of their ancestral land in various ways, all being dispossessions as envisaged by the Restitution Act.

36 Prior to 31 December 1998, the community and their representatives had a number of contacts with officials of the Commission for the Restitution of Land Rights.

37 They were advised that due to their close ethnic and traditional links with the neighbouring Tshivhola and Leshivha communities, these communities should all be included in a single community claim. A subsequent community claim was lodged in the name of the Leshivha community.

38 Initially, certain representatives of the Second Applicant community were represented on the representative structures formed for the

new Leshivha claim. The consolidation of these claims did not work for obvious reasons. The three communities, although they have very close traditional ties, always owned separate land in the indigenous context.

39 The essence of the shared rules in terms of which the land was used, was that these separate communities had relatively clear boundaries between each other.

40 The representatives of the Second Applicant found themselves continuously at odds with the representatives of the other two communities, and the relations eventually broke down to such an extent that the Third Applicant community was effectively excluded from the activities of the consolidated land claims committee.

41 The Second Applicant community therefore wishes to lodge a new land claim in their own name and over their own ancestral land only. This accords with the intentions and purpose of the Constitution and the Restitution Act.

42 They are also advised that lodging such a new claim is legally sound and that the initial “consolidation” of claims was wrong.

Third Applicant

43 During the period of 1965 to 1974 the occupants of Mlungisi, a township of Queenstown, were moved to Ezibeleni which was incorporated into the Transkei. The forced removals were done in terms of the racially discriminating laws of the time. It also involved the loss of citizenship.

44 Before 31 December 1998, many of the people who were so removed, or their descendants, lodged land claims in terms of the Restitution Act. For a variety of reasons, many other did not lodge land claims.

45 Some claims were lodged as community claims, and many individuals thought they would be included in such claims. This eventually appeared to be an incorrect approach to the claims, being individual urban claims.

46 Other individuals, such as the deponent Mr Hanı, were advised by officials of the Commission, that their cases do not constitute “forced removals” and are therefore not covered by the Restitution Act. This was, of course, also completely incorrect.

47 When members of the Third Applicant attempted to submit their names for verification in terms of the community claims, they were advised that they could not do so.

48 As a result of these facts, the members of the Third Applicant were deprived of their right to claim restitution.

49 The Third Applicant and its members have for many years advocated for the re-opening of the claims process. They have had numerous meetings with politicians, departmental officials and members of the national and provincial executive. They have on occasions also protested for such re-opening.

50 Third Applicant’s members therefore intend making use of the re-opened process to lodge new claims. Mr Hanı advises that he

estimates that some three hundred of the members have already lodged new claims in terms of the Amendment Act.

51 The claims of the people who lodged claims prior to 31 December 1998 have all been finalised and they have received restitution, mostly in the form of financial compensation.

52 There exists no reason in logic or fairness why these claims should be further delayed. The facts of the forced removals are well documented, the merits are accepted and all investigations have already been completed.

Fourth Applicant

53 Fourth Applicant's members were all tenants in homes at the Lady Selborne Township, some 7 kilometres northwest of the Pretoria CBD.

54 As they were not owners of properties, they were advised that they didn't have claims in terms of the Restitution Act. This, despite the

fact that their forced relocation caused much the same disruption of their lives, being relocated some 25 kilometres further away to Ga-Rankuwa and thus further removed from the economic opportunities in Pretoria.

55 This advice, they are now advised, was wrong.

56 The Commission and the Department of Rural Development and Land Reform have acknowledged this and have attempted to assist the erstwhile tenants of Lady Selborne by including them as beneficiaries in the newly re-established Lady Selborne housing developments northwest of the Pretoria CBD.

57 However, some ten years after these promises, and formal litigation against the Commission, the Minister and the City of Tshwane, the members of Fourth Applicant are still experiencing problems receiving the promised benefits and many remain completely excluded from the housing developments.

58 As a result, the members of the Fourth Applicant wish to strengthen their legal positions by formally lodging land claims. They believe, on advice, that this will change their position as beneficiaries of a discretionary programme, to being beneficiaries in a rights-based programme. Further delays in their claims, will mean that they will miss out on housing opportunities that are presently being created in Lady Selborne developments.

DIRECT AND SUBSTANTIAL INTEREST

59 The Applicants submit that if any of the relief in the first issue is granted, the Applicants and their members will be deprived of an opportunity to lodge their new claims.

60 More pertinent to their participation in the main application, if any of the relief in respect of the second issue is granted, the Applicants and their members will not be able to make their claims progress for many years to come. The delays could even involve decades.

61 Such a result will be grossly unfair towards the Applicants. They therefore have the right to defend their interests in the main

application. Most of these claims can be processed at same time as the older claims are prioritised. The either-or approach of the Applicants on the main application is with respect wrong.

62 Although the Applicants in this application make common cause with the First to Fourteenth Respondents in the main application, their interests are by no means identical to that of the First to Fourteenth Respondents. The Applicants also differ with these Respondents on some of the legal issues, as I set out below.

63 In the premises, I respectfully submit that the Applicants have a direct and substantial interest in the outcome and the subject matter of the main application.

IT IS JUST AND EQUITABLE TO GRANT LEAVE TO INTERVENE

The new claimants are not represented in these proceedings

64 This matter involves serious issues of great public importance.

65 We accept that all those claimants who are anxious to have their claims resolved speedily, and are frustrated by the long delays, have brought the main application in bona fide pursuit of their constitutional rights. There is, however, another side to this matter, and that is the interests of those who wish to lodge new land claims.

66 These new claimants also have important constitutional rights that they wish to assert. Whatever the outcome of the matter, it is fundamental to legal fairness that the parties that represent the counter side also be heard before judgment is passed.

67 I respectfully submit that this is a matter where justice must not only be done, but must be seen to be done. We are not the “chiefs and their traditional councils” as the Applicants in the main application wishes to make out. We are bona fide communities and individuals who wish to assert our constitutional rights.

68 I submit that it is in the interests of justice that the Applicants, whether as traditional communities or as a collective of individual claimants, be joined in these proceedings. They were unable to lodge their individual claim mainly because they were ill-advised.

They should be afforded an opportunity to lodge same in respect of the land which forms the subject matter of a pending claim, so that all the claims can be finally adjudicated upon.

The Applicants raise different issues

69 Although the Applicants all make common cause with the First to Fourteenth Respondents as to the outcome of the matter, the Applicants will raise a number of different issues, and also do not agree with all the assertions made by these Respondents.

70 Although our interests are aligned with that of the State Respondents, they are not identical. We also remain vulnerable to any concessions that may be made either in negotiations or during the proceedings that we may not wish to align ourselves with.

71 The Twelfth and Fourteenth Respondents assert that the common law maxim *prior in tempore, potior in ius* applies to the provisions in the Amendment Act. In this way, they wish to assert that the older claims will certainly receive priority in all cases, and hence the claim is unjustified. In this regard I invite the Honourable Court's attention

to paragraphs 7.2.1 and 40 of the answering affidavit on behalf of Twelfth and Fourteenth Respondents.

72 We, as Applicants in this application, take issue with this central submission. Not only do we submit that the maxim is not applicable in the present context, but that even applying an analogous principle, would unduly fetter the discretion of the Regional Land Claims Commissioners. In addition, the maxim is at odds with a purposive and contextual interpretation of the Restitution Act.

73 The Thirteenth Respondent correctly points out that the Restitution Act has always required that certain claims be given priority. However, the Thirteenth Respondent fails to explain why, despite these provisions, such a large number of rural land claims have seemingly failed to receive priority.

74 The only real reason advanced by the Thirteenth Respondent is that provisional decisions on the merits are taken on review. In this regard I invite the Honourable Court's attention to paragraph 30 of the Thirteenth Respondent's answering affidavit.

75 The Thirteenth Respondent does not refer to the many other provisions of the Restitution Act that makes it difficult or impermissible for certain claims to proceed until all other claims have been investigated and assessed. Section 12(4) of the Act is only applicable until the final cut-off date. In the present scenario, this provision, as with the initial period up to 31 December 1998, will only be relevant until the next cut-off date, namely 30 June 2019. Restitution claims will still be processed for very long after that.

76 More relevant, is that the requirement to “ensure that priority is given” is limited to the administrative processes of the Commission. The court is required to similarly give priority. The Land Claims Court must ensure that all interested parties have a fair chance of joining proceedings and presenting their respective cases.

77 Nothing stops a claimant from bringing direct access proceedings in terms of chapter IIIA of the Restitution Act. Only in cases envisaged by subsections 38B(1)(a) and (b), is the right to bring direct access proceedings not absolute.

78 Any order or provision that would “ring-fence” older claims, would be in direct conflict with chapter IIIA. The order that seeks to ring-fence

older claims by interdicting the RLCCs from investigating such claims will therefore be of no consequence. It certainly will be of no consequence to claimants who have the ability to pursue their claims independently. The result will be that claimants with insufficient resources will be discriminated against.

79 The Twelfth to Fourteenth Respondents also don't consider the relative merits of "old order claims" and new claims. We respectfully submit that the assessment of the merits of the claims is crucial in deciding which claims to process and allocate resources to. Older claims with relatively poor prospects, should not be prioritised over new claims that have strong merits. For this reason, the Commission cannot simply take new claims to the stage of acceptance, and then ignore them. Although this is the argument advanced by the Applicants in the main application, the Thirteenth Respondent does not consider the issue of the relative merits of the claims.

80 None of the other parties refer to the relative difficulties in investigating claims. This is in fact the real reason why some claims are processed reasonably fast and others seemingly cannot make progress.

81 Neither the Applicants in the main application, nor any of the Respondents, sufficiently distinguishes between rural claims in the sense of community claims, and urban claims in the sense of individual claims. The Thirteenth Respondent only refers to the fact that most of the new claims are for monetary compensation.

82 It can be accepted that these claims for compensation are mostly urban claims. However, it cannot be accepted that all the urban claims will be for monetary compensation. In any event, in both cases, the urban claims will be relatively easy to investigate. Claims for compensation will then be settled similarly quickly and the claims for land will become part of the urban housing processes.

83 First, it can be accepted that almost all urban claims, with a few exceptions, have been settled. There are therefore no claims to be ring-fenced. There is similarly no reason to delay the urban claims such as those of the members of the Third and Fourth Applicants in this application.

84 The requirement of priority is only relevant to rural community claims where the investigation into historically held unregistered

rights poses enormous challenges. In the context of section 6 of the Restitution Act, that provides that the Commission “may”, the issue of priority involves a discretion to be exercised on a case-by-case basis. The justification for discretions in administrative law must be found in the legislative context and purpose, and as such the central issue in the main matter will have to consider the interests of all affected persons, including the new claimants.

The merits of the Applicants’ case

85 I respectfully submit that our opposition to the main application has strong merits.

86 First, the provisions of section 6(1)(g) are not impermissibly vague. They are purposively broad to ensure that the Land Claims Court can make a just and equitable decision as required by sections 33 and 35 of the Restitution Act on a case-by-case basis.

87 Secondly, this is an issue for the Land Claims Court to decide as court of first instance. What it means to give “priority”, is something that the LCC is pre-eminently positioned to decide, as it has a very specific institutional relationship with the Commission.

THE TIMING OF THIS APPLICATION

88 I am advised that an application for joinder may be brought at any time in the proceedings. Even so, I am advised that such an application must be brought within a reasonable time to ensure that sufficient time is allowed for all the necessary litigation processes to be adhered to.

89 At the same time, a party who wishes to join must show that it raises different issues than the other parties.

90 I therefore wish to explain the reason why this application could not be brought at an earlier stage. For confirmation of these allegations I refer to the confirmatory affidavit of Ms Nathaniah Jacobs annexed hereto.

91 Ms Jacobs, our attorney of record, first received a copy of the main application in early May 2015. She realised that many of her clients may be adversely affected by the relief being sought. She wrote a letter to the other parties, which I annex hereto as annexure "ST2". She was informed that the State Respondents would not oppose,

but the Applicants did not want to concede. In this regard I annex annexure “ST3”, the response thereto.

92 At the same time, Ms Jacobs arranged for a number of her clients to travel to Pretoria and consult on 20 and 21 May 2015. After that, the process of considering the content of this application started, but it was kept in abeyance as the parties in the main application was involved in settlement negotiations.

93 As a result, it would appear that the answering affidavits were delayed. Ms Jacobs only received the answering affidavits of the Twelfth and Fourteenth, and the Thirteenth Respondents on Friday 3 July.

94 After that, the affidavits were assessed during the week of 6 to 10 July and our affidavits were then finalised by 13th July. Arrangements were then made for signature and lodgement.

95 I respectfully submit that we as applicants and our attorneys have acted with due diligence in this matter and that there is sufficient time left before the hearing to accommodate our participation. After

all, the Applicants in the main application had some six months to prepare their application.

96 As the time available does not permit the use of the full time periods provided for in Rule 11, especially Rules 11(3)(a)(ii) and 11(3)(b), we ask that non-compliance in this regard be condoned. We submit that the time periods that we allow in the notice of motion are reasonable under the circumstances.

97 We therefore request that the relief sought in the notice of motion be granted and that the Applicants herein be admitted as Fifteenth to Eighteenth Respondents in the main application with the right file written argument and to present oral argument subject to such directions as the honourable Chief Justice may determine.

Deponent

SIGNED and SWORN to BEFORE me at Pretoria on this the ____ day of July 2015, the deponent having acknowledged that he/she understands the contents of this affidavit, has no objection to taking the prescribed oath, considers the oath binding on his/her conscience and that the provisions of the regulations as contained in Government Notice No R1258 dated 21 July 1972 and Government Notice R1648 of 19 August 1977, as amended, have been complied with.

COMMISSIONER OF OATHS

Full names:

Capacity:

Address: