



AFFIDAVIT

I, the undersigned

**NAKITA SUTTER
(ID 8611260194085)**

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. On 30 July 2026, I investigated a complaint concerning dogs allegedly being kept in poor and unsuitable conditions at 21 Honeysuckle Street, Bridgetown, Cape Town.
4. Upon my arrival at the property, I met with the female owner, who was present at the residence. The owner requested that I enter the property through the gate.
5. Upon the gate being opened, all of the dogs immediately ran out into the roadway. I assisted the owner in safely returning the dogs to the property.
6. Upon entering the yard, I observed that the area was heavily soiled with animal faeces and contained scattered debris. I further observed that there was no food or water available or accessible to the animals at the time of my inspection.
7. The owner informed me that she was the sole breadwinner in the household and that she was unable to adequately care for the number of dogs kept on the property.
8. I observed a total of three adult dogs and nine puppies on the property.
9. Upon closer inspection of the animals, I observed that two of the adult dogs were suffering from visible skin conditions. I further observed that all of the animals were infested with fleas and were actively scratching themselves in my presence.
10. During my inspection, I noticed that two of the puppies did not approach or remain with the rest of the litter. I investigated further and discovered that both puppies were deceased.
11. When I questioned the owner regarding the deceased puppies, she stated that the puppies had been crying extensively during the previous night and had become trapped in an object. She further stated that she assumed the puppies were unharmed because she no longer heard them crying the following day.

I, **Nakita Sutter**, further state under oath and in English that:

12. My arrival at the property was shortly after 13:00 on 30 July 2026. Based on the information provided by the owner, the deceased puppies had therefore remained in that condition since the previous evening without receiving attention, intervention or veterinary care.
13. The condition of the property, the absence of food and water, the flea infestation affecting the animals, the visible skin conditions affecting two of the adult dogs, and the manner in which the deceased puppies had been left unattended were, in my observation, not conducive to the welfare of the animals.
14. I explained to the owner that the conditions in which the animals were being kept were unacceptable and that the circumstances observed could constitute offences in terms of the applicable animal welfare legislation.
15. The owner stated that she did not have the financial means or resources necessary to properly care for the animals and requested that all of the dogs be surrendered to the SPCA.
16. The surviving dogs were subsequently surrendered by the owner and admitted to the SPCA for appropriate care, assessment and treatment.
17. Based on my observations during the investigation, I submit that the animals were neglected and kept in conditions that were detrimental to their welfare. The animals were kept in an excessively dirty environment, were infested with fleas, and were not provided with adequate food or water. In addition, animals displaying apparent medical conditions were not provided with appropriate veterinary attention.
18. I hereby request that Law Enforcement issue the appropriate fine(s) to Matthew Moses and Aliyah Adams, being the persons identified as the owners/responsible persons in respect of the animals, for contraventions of the Animals Protection Act 71 of 1962, specifically;
 - a. Section 2(1)(a) in respect of neglecting the animals and
 - b. Section 2(1)(e) in respect of failing to render or procure veterinary treatment and care where required.
19. The alleged contraventions include, but are not limited to, neglecting the animals, failing to procure or provide necessary veterinary treatment, allowing the animals to remain infested with fleas, and keeping the animals in excessively dirty and unsuitable living conditions.
20. I accordingly request that the circumstances described in this affidavit be considered for the institution of the appropriate enforcement action against Matthew Moses and Aliyah Adams in terms of the Animals Protection Act 71 of 1962.
21. **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.

DEPONENT

The deponent has acknowledged that she knows and understands the contents of this affidavit/declaration, which was signed and sworn to before me at _____

I, **Nakita Sutter**, further state under oath and in English that:

on this the _____ day of _____ 20____, 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.

COMMISSIONER OF OATHS

Full names:

Designation:

Business address: