



DA

ONE NATION. ONE FUTURE

DA HIGH COURT APPLICATION

**APPLICATION TO HAVE SECTION 33 (1) (e) OF
THE ELECTORAL ACT DECLARED
UNCONSTITUTIONAL**

Democratic Alliance
26 January 2009

BUILDING AN OPEN, OPPORTUNITY SOCIETY FOR ALL

BOX NO **93**

**IN THE HIGH COURT OF SOUTH AFRICA
(CAPE OF GOOD HOPE PROVINCIAL DIVISION)**

In the matter between:

THE DEMOCRATIC ALLIANCE

ROY HOWARD TIPPER

and

THE MINISTER OF HOME AFFAIRS

THE ELECTORAL COMMISSION

THE DIRECTOR-GENERAL OF HOME AFFAIRS

First Applicant

Second Applicant

First Respondent

Second Respondent

Third Respondent

CASE NO.

1270/09

NOTICE OF MOTION

PLEASE TAKE NOTICE that the abovenamed Applicants intend to make application to this Honourable Court on Tuesday 10 February 2009 at 10h00 or as soon thereafter as the matter can be heard for orders:

1. declaring the application to be a matter of urgency and dispensing insofar as is necessary in terms of Rule 6(12) with the usual forms and service provided for in the Uniform Rules of Court;
2. declaring section 33(1)(e) of the Electoral Act 73 of 1998 to be inconsistent with the Constitution of the Republic of South Africa and

invalid to the extent that it limits the entitlement of a registered voter to a special vote in the case of temporary absence from the Republic to those limited categories of temporary absentees referred to in the section, who have in addition furnished notice as prescribed within 15 days after the proclamation of the date of the election in question;

3. directing the Respondents to ensure that all South African citizens who are precluded from voting in the forthcoming 2009 elections only by reason of their temporary absence from South Africa are afforded a reasonable opportunity to vote in the elections;
4. granting the Applicants further and/or alternative relief;
5. directing First Respondent to pay Applicants' costs of suit including costs of two counsel, and in the event of any other Respondent opposing this application, directing that such costs be paid on a joint and several basis by the Respondents opposing.

TAKE NOTICE FURTHER that the affidavits of **James Selfe** and **Roy Howard Tipper** annexed hereto will be used in support of the application.

TAKE NOTICE FURTHER that Applicants have appointed Minde Schapiro & Smith, Tyger Valley Office Park, Building No 2, Cnr Willie van Schoor and Old Oak Roads, Belville, Cape Town (Ref: Mr. Mervyn Smith/Ms S Solomons), care of **GERALD SHNAPS**, Suite 902, 47 on Strand, 47 Strand Street, Cape Town as the address referred to in Rule 6(5)(b) at which it will accept notice and service of all process in these proceedings.

TAKE NOTICE FURTHER that if you intend opposing this application you are required to notify Applicants' attorneys in writing on or before 16h00 on Friday 30 January 2009 and to file your answering affidavits, if any, by 15h00 on Monday 2 February 2009 and further that you are required in your notice of intention to oppose the application to appoint an address referred to in Rule 6(5)(b) at which you will accept notice and service of all documents in these proceedings.

KINDLY ENROLL THE MATTER FOR HEARING ON 10 February 2009.

DATED AT CAPE TOWN THIS

23rd

DAY OF JANUARY 2009

MINDE SCHAPIRO & SMITH

PER:

Mr. Mervyn Smith

Applicants' Attorneys

Tyger Valley Office Park

Building No 2

Cnr Willie van Schoor & Old Oak Roads

BELVILLE

(REF:MR M SMITH/MS S SOLOMONS)

c/o GERALD SHNAPS

Suite 902

47 on Strand

47 Strand Street

CAPE TOWN

TO: The Registrar
High Court
CAPE TOWN

AND TO: The Minister of Home Affairs

First Respondent
c/o State Attorney
Liberty Life Centre
22 Long Street
CAPE TOWN

AND TO: The Electoral Commission

Second Respondent
Mutual Centre
52-54 Voortrekker Road
Bellville
CAPE TOWN

AND TO: The Director-General of Home Affairs

Third Respondent
56 Barrack Street
CAPE TOWN

DEPARTMENT OF HOME AFFAIRS
PRIVATE BAG X9048 CAPE TOWN 8000
2009 -01- 23
RSA
DIRECTOR-GENERAL'S SECRETARIAT

23 JAN 2009
@15:15
STATE ATTORNEY: CAPE TOWN

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23/01/09

**IN THE HIGH COURT OF SOUTH AFRICA
(CAPE OF GOOD HOPE PROVINCIAL DIVISION)**

CASE NO.

In the matter between:

THE DEMOCRATIC ALLIANCE

First Applicant

ROY HOWARD TIPPER

Second Applicant

and

THE MINISTER OF HOME AFFAIRS

First Respondent

THE ELECTORAL COMMISSION

Second Respondent

THE DIRECTOR-GENERAL OF HOME AFFAIRS


Third Respondent

FOUNDING AFFIDAVIT

I, the undersigned

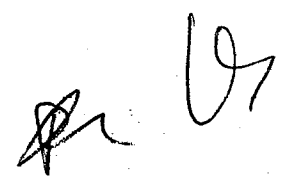
JAMES SELFE,

do hereby make oath and say:

 1977

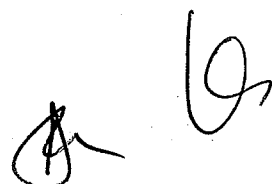
INTRODUCTION

1. I am a Member of the National Assembly of the Parliament of the Republic of South Africa, representing the Democratic Alliance (the First Applicant). My offices are at 242 Marks Building, Parliament, Cape Town, Western Cape. I am the Chairperson of the Federal Executive Council of the First Applicant, and I am duly authorised by it to make this affidavit.
2. The facts set out in this affidavit are true and correct and within my personal knowledge and belief, unless indicated to the contrary. Where I make legal averments, I do so on the advice of the legal representatives of the First Applicant.
3. This application challenges the constitutionality of parts of section 33(1)(e) of the Electoral Act 73 of 1998 ("the Electoral Act"), on the grounds that such parts create arbitrary and irrational distinctions and that they unjustifiably limit section 19 of the Constitution of the Republic of South Africa, 1996 ("the Constitution").
4. Section 19 of the Constitution sets out the rights of citizens to participate in the political process, in particular by voting.
5. Section 33(1)(e) of the Electoral Act in part unjustifiably limits these rights by setting out an inadequate and irrational system for voters who are temporarily absent from South Africa. In this connection I would add that although the present application confines itself to the unconstitutionality of parts of section 33(1)(e) of

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the Electoral Act and does not address the question of the right of South African citizens no longer ordinarily resident in South Africa to vote, the First Applicant reserves the right to raise a challenge in this connection in due course in further proceedings.

6. The effect of this system is that an arbitrarily-defined number of persons who should be entitled to vote – by virtue of being South African citizens who are ordinarily resident in South Africa and are registered as voters – are effectively denied their rights simply because of a temporary absence from the country, while temporary absentees not falling within the excluded categories retain their right to vote.
7. The First Applicant is the Democratic Alliance, a registered political party with elected representatives in local, provincial and national spheres of government and duly registered as contemplated by section 26 of the Act. Its principal offices are at Theba Hosken House on the corner of Breda and Mill Streets in Gardens, Cape Town.
8. As a registered political party the First Applicant has an interest, *inter alia*, in ensuring that no South African citizen is unconstitutionally prohibited from casting his or her vote and accordingly it has standing. The First Applicant has standing in its own right, as well as on behalf of the class of persons whose rights are affected by the unconstitutional law, on behalf of its members and in the public interest.

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9. The Second Applicant is one of an uncounted number of South Africans who will probably be temporarily absent from South Africa on the day of the elections and who but for such temporary absence would have been entitled to vote.
10. The First Respondent is the Minister of Home Affairs, who is cited in her official capacity as the political head of the department responsible for giving effect to the Electoral Act. She is cited care of the State Attorney, Liberty Life Centre, 22 Long Street, Cape Town.
11. The Second Respondent is the Electoral Commission (the Commission), an independent body set up in terms of section 190 of the Constitution and the Electoral Commission Act 51 of 1996, of Mutual Centre, 52-54 Voortrekker Road, Bellville, Cape Town. The purpose of the Commission is to manage government elections within South Africa and to ensure that those elections are free and fair. The Commission is the body that is tasked with the implementation of section 33 of the Electoral Act, and therefore has an interest in the relief sought in the notice of motion.
12. The Third Respondent is the Director-General of the Department of Home Affairs, who is cited in his official capacity. No relief is sought against him, unless he opposes this application. He is cited because of any interest he may have in the relief sought in this application.

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THE NATURE OF THIS APPLICATION

13. The First Applicant contends that section 33(1)(e) of the Electoral Act is inconsistent with the Constitution by inhibiting or preventing citizens from voting while temporarily absent from South Africa. Section 33(1)(e) does this in two ways:

13.1 First, by creating a number of arbitrary distinctions between citizens who may or may not vote while temporarily absent from South Africa; and

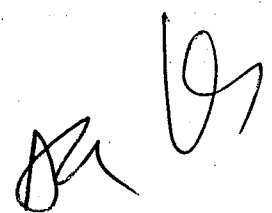
13.2 Secondly, by creating an unreasonably abbreviated time period within which the prescribed form of notification is to be given to the Commission.

14. Based on the above, section 33(1)(e) not only unjustifiably limits a citizen's right to vote in terms of section 19(3)(a) of the Constitution, but also infringes on the requirement of rationality inherent in the rule of law and the Constitution.

15. For these two reasons, the First Applicant submits that section 33(1)(e) must be struck down in part.

LEGAL BACKGROUND

16. The right to vote, or the denial thereof, has played a critical role in South Africa's history. The edifice of apartheid, which marginalised and oppressed the majority



of South Africa's population over many years was based squarely upon the refusal of the white minority to allow non-whites the right to vote.

17. This refusal was an implicit recognition of the immense importance of the vote: the vote is a citizen's primary method of participating in the political process and of holding his or her political leaders to account.

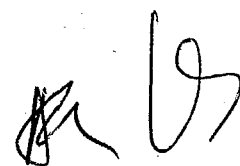
The Constitution

18. This history was recognised in the interim Constitution of 1993 (Act 200 of 1993) and the Constitution of 1996.
19. The right of South African citizens to vote is protected by section 19(3) (a) of the Constitution, which provides:

"Every adult citizen has the right—

(a) to vote in elections for any legislative body established in terms of the Constitution, and to do so in secret"

20. Universal adult suffrage on a common voters' roll is one of the foundational values of the Constitution, and is enshrined as such in section 1(d) of the Constitution.
21. The importance of the right to vote is reinforced by sections 2 and 172(1)(a) of the Constitution, which provide that the Constitution is the supreme law of South Africa and that law inconsistent with it must be held to be invalid. Furthermore,

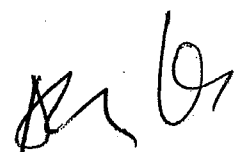


section 39(2) requires every court, when interpreting legislation, to promote the spirit, purport and objects of the Bill of Rights, including the right to vote contained in section 19 of the Constitution.

22. From this basis it is not overstating the importance of the right to vote to say that it is foundational to a functioning democracy.
23. The vote of each and every citizen is a badge of dignity and personhood. Quite literally, it says that everybody counts.

The relevant legislation

24. The overarching piece of legislation that regulates elections, and thus sets up the framework in which votes are cast, is the Electoral Act. The Electoral Act came into effect on 16 October 1998 and replaced the Electoral Act 202 of 1993. Section 2(a) of the Electoral Act requires that it be interpreted in a way that gives effect to the declarations, guarantees and responsibilities contained in the Constitution.
25. Central to the administration of an efficient, legitimate and secure election is the existence of a national common voters' roll, containing the details of all persons who are registered, and thus permitted, to vote.



26. In terms of sections 6 and 8 of the Electoral Act, in order to be allowed to registered on the national common voters' roll a person must:

26.1 be a South African citizen;

26.2 be of at least 18 years of age; and

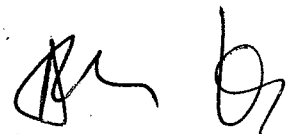
26.3 be in possession of a valid identity document.

27. In terms sections 7(3)(a) and 8(3) of the Electoral Act, a person's name must be entered in the voters' roll only for the area where the person lives and to which that person regularly returns after any temporary absence.

That is the area in which the person is "ordinarily resident", although it should be interpreted in a way which facilitates constitutional and legislative objectives. The scheme of the Electoral Act assumes that, in the vast majority of cases, a person will vote in the same place as he or she is ordinarily resident.

28. According to section 24(1) of the Electoral Act, the cut-off date for additions or amendments to the voters' roll is the date upon which the election is proclaimed. Thus registration of voters must happen prior to that date.

29. Sections 24A(1) and 33(1) set out the procedure to be followed when a person is voting in a district in which he or she is not registered as a voter. Section 24A(1) deals with a voter who is voting within South Africa but outside his or her voting district, and section 33(1) deals with voters who are outside South Africa entirely.



Both sections will be set out in full as useful comparisons can be drawn between them:

“24A Voting in voting district where not registered

(1) A person whose name does not appear on the certified segment of the voters' roll for a voting district and who applied for registration as a voter before the date the election was proclaimed may submit to the presiding officer of the voting station for that voting district-

- (a) his or her identity document;**
- (b) a sworn or solemnly affirmed statement in the prescribed form containing-**
 - (i) his or her full name, identity number and date of birth;**
 - (ii) his or her finger print;**
 - (iii) the address where he or she ordinarily resides;**
 - (iv) a declaration that he or she applied for registration as a voter before the date of publication of the proclamation proclaiming the election;**
 - (v) a request that his or her name should be included in the certified segment of the voters' roll for that voting district for the purposes of the election for the National Assembly and also for the purposes of the election for the provincial legislature if he or she had so applied for registration in the province in which that voting district is situated; and**
 - (vi) a declaration that he or she is a South African citizen, is 18 years of age or older and is not disqualified from voting in the election in question; and**
- (c) proof that he or she applied for registration as a voter before the date of publication of the proclamation.**

(1) The Commission must allow a person to apply for a special vote if that person cannot vote at a voting station in the voting district in which the person is registered as a voter, due to that person's-

- (a) physical infirmity or disability, or pregnancy;
- (b) absence from the Republic on Government service or membership of the household of the person so being absent;
- (c) absence from that voting district while serving as an officer in the election concerned; or
- (d) being on duty as a member of the security services in connection with the election.
- (e) temporary absence from the Republic for purposes of a holiday, a business trip, attendance of a tertiary institution or an educational visit or participation in an international sports event, if the person notifies the Commission within 15 days after the proclamation of the date of the election, of his or her intended absence from the Republic, his or her intention to vote, and the place where he or she will cast his or her vote."

30. A comparison of the two sections shows that section 33(1)(e) requires a great deal more from a citizen before he or she is allowed to vote than does section 24A, despite the sections applying to situations comparable in many respects.

THE VIOLATION OF THE CONSTITUTIONAL RIGHT TO VOTE

31. The right to vote guaranteed to South African citizens in the Constitution may only be limited by a law of general application that satisfies the test set out in section 36 of the Constitution.

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32. The First Applicant submits that the provisions of the Electoral Act in relation to ordinary residents who are temporarily absent from South Africa on the date of an election do not satisfy the section 36 limitation enquiry.

33. Section 36 provides:

“36 Limitation of rights

(1) The rights in the Bill of Rights may be limited only in terms of law of general application to the extent that the limitation is reasonable and justifiable in an open and democratic society based on human dignity, equality and freedom, taking into account all relevant factors, including-

- (a) the nature of the right;**
- (b) the importance of the purpose of the limitation;**
- (c) the nature and extent of the limitation;**
- (d) the relation between the limitation and its purpose; and**
- (e) less restrictive means to achieve the purpose.**

(2) Except as provided in subsection (1) or in any other provision of the Constitution, no law may limit any right entrenched in the Bill of Rights.”

Nature of the right

34. The First Applicant has already explained above the critical nature of the right to vote. This has been confirmed by the Constitutional Court in the cases of **August and Another v Electoral Commission and Others 1999 (3) SA 1 (CC)**, **New National Party of South Africa v Government of the Republic of South Africa and Others 1999 (3) SA 191 (CC)**, and **Minister of Home Affairs v NICRO and Others 2005 (3) SA 280 (CC)**.

The importance of the purpose of the limitations

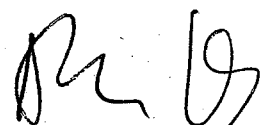
35. The First Applicant assumes from the wording of section 33(1)(e) of the Electoral Act that its purpose is to ease the administrative burden that might otherwise fall upon the Commission. While this is an understandable governmental objective, it is not as important as the right of South African citizens to vote and to participate in the determination of who should represent them, as well as to hold their elected government accountable.
36. The Commission exists solely to undertake the difficult administrative task of giving all adult South African citizens the opportunity to vote; to use that selfsame complexity as a reason to avoid the obligation of facilitating the exercise of the rights of citizens to vote would nullify the Commission's purpose and duty.

The nature and extent of the limitation

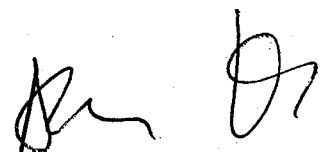
37. The limitations imposed by section 33(1)(e) are both drastic and arbitrary.

Of the otherwise-eligible voters who may be outside South Africa on the day of elections, only those that fall into the listed categories – business trips, international sporting events, and so on – may vote.

Persons outside those categories, such as a person attending the funeral of a parent or attending a sporting event that is not between two countries, are completely denied their right to vote.



38. Even persons who do fall into the listed categories must comply with additional requirements before they may vote. These persons must notify the Commission, within 15 days of the proclamation of their intended absence from the Republic, of their intention to vote, and of the place where they intend to cast their vote.
39. Once again, if citizens fail to fulfil these requirements, which in some cases amounts to prophesying the future, their constitutional and democratic right to vote is annulled.
40. It be accepted that notification of intended absence, of the intention to vote and of the contemplated place of voting is reasonably necessary in the case of temporary absentees, to assist the Commission in its task of providing special voting facilities for such voters, any deadline for furnishing such notification must be as generous and accommodating as possible in the circumstances.
41. Requiring such notification to be given to the Commission within 15 days after the proclamation is unreasonable and operates to disqualify unnecessarily persons otherwise entitled to vote. In many cases those temporarily absent from South Africa on the day of the elections will have been unaware during the fifteen day period that this would be the case. In addition, in the ordinary course there will inevitably be people who for any number of reasons fail to comply with what is a short notice period. It is respectfully submitted that, in order to promote enfranchisement rather than disenfranchisement, the notification period should be

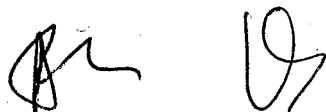
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as generous and as extended as possible. The 15 day period is unreasonable and unnecessarily obstructive of the process of enfranchisement.

The relation between the limitations and their purpose

42. There is no rational and justifiable link between the limitations and their purpose. Assuming that the purpose of section 33(1) (e) is to avoid placing excessive burdens on the Commission, there appears to be no reason why it is more difficult for the Commission to grant a special vote to person on holiday as opposed to a person attending a funeral, a person at an inter-club sporting event (such as a Super 14 rugby match) opposed to an international sporting event (such as Tri-nations rugby match), or a person on a temporary work visa as opposed to a business trip.
43. Nor, as stated above, does there appear to be any good reason why so unnecessarily limited a time period is afforded to prospective temporary absentees to give the prescribed notification to the Commission.
44. The categories and limitations section 33(1)(e) creates are arbitrary and thus, by their very nature, demonstrate that there is no link between them and the purpose the section seeks to serve.

Less restrictive means to achieve the purpose

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45. The First Applicant submits that there are a number of common-sense ways in which the process of protecting the right to vote could be enhanced. These include:

45.1 scrapping the arbitrary distinctions between categories or classes of temporary absentees;

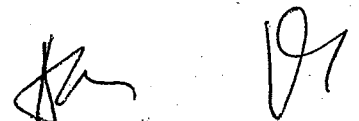
45.2 if it is not possible to follow a procedure analogous to that provided for in section 24A of the Electoral Act, by at least providing as generous and extended a notification period as possible in the circumstances.

46. The First Applicant accepts that it is the Commission's task to develop, in accordance with the Constitution and the law, its own procedures for this process. Accordingly the First Applicant does not in the relief sought attempt in any way to prescribe to the Commission how it should respect and protect the right to vote.

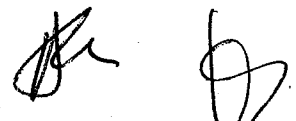
IRRATIONALITY/ARBITRARINESS OF SECTION 33(1)(e)

47. Not only does section 33(1)(e) of the Electoral Act violate the right to vote contained in section 19 of the Constitution, but it is unconstitutional for another reason.

48. The provision is inconsistent with the rule of law and the principle of legality because it makes irrational and arbitrary distinctions within the class of South African citizens who are temporarily absent from South Africa on the election day.



49. The absence of a rational relationship between a scheme adopted by government and a legitimate governmental purpose renders that scheme unconstitutional.
50. There are two forms of irrational distinctions drawn by section 33. The first form is seen in the categories of persons in section 33(1)(e) who are allowed to vote while temporarily absent from South Africa.
51. A few examples suffice to show the arbitrariness of these distinctions:
 - 51.1 If the Springboks (the South African rugby team) and the Stormers (a provincial rugby team) were both playing in Australia during the election, the Springboks could vote but the Stormers could not.
 - 51.2 A person who was sent by his firm on business trip to New York could vote, but a person who went there to be a temporary worker could not.
 - 51.3 A person who visited Zimbabwe on holiday could vote, but a person who went there to bury his dead father could not.
52. There is no rational reason why, above, the one person should be allowed to vote and the other not.
53. This is particularly true given that the rationale for denying a citizen the right to vote is to minimise administrative burden on the Commission.

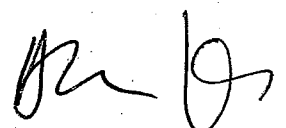


54. It is axiomatic that the administrative burden will be the same no matter the reason for the person's presence in the foreign country.
55. The second form of irrational distinction is between the persons who are allowed to vote in foreign country in terms of section 33(1)(e) and those allowed to vote in a foreign country in terms of section 33(1)(b). Section 33(1)(b) allows persons on government service and their household members to cast a special vote, without any of the restrictions.
56. Section 33(1)(b) demonstrates that it is practically possible for the Commission to grant a person a special vote without the extra burdens that are created in section 33(1)(e).
57. A person on government service may have a close connection with an embassy in a foreign country, but there is no rational reason why other people, such as those there on temporary work permits, cannot visit the embassy with the required documentation.
58. The First Applicant respectfully submits that section 33(1)(e) is therefore arbitrary and in violation of the rule of law contained in the Constitution, as it creates a series of distinctions that are not rationally connected to the legitimate government objective of streamlining the voting process.

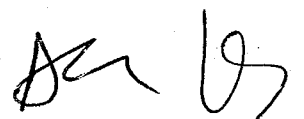
URGENCY



59. The Applicants seek to have this matter heard on an urgent basis. The Applicants submit that not only is this matter urgent, but that it will be impossible for the Applicants to gain substantial redress at a hearing in due course.
60. The primary reason for the urgency is obvious: this matter must be resolved before the 2009 elections.
61. The 2009 elections for the national and provincial legislatures have not yet been proclaimed, but in terms of the Constitution they are effectively required to be held during the first half of 2009.
62. If the elections take place prior to the resolution of this application, a significant number of South African citizens who under the Constitution had the right to vote would have been precluded from exercising their democratic and constitutional right to vote by virtue of the unconstitutional legislation.
63. This state of affairs is unsatisfactory because not only would those persons' rights have been irrevocably and unjustifiably violated but the representivity of the body politic will have been affected, in that a number of persons whose democratic voice should have been heard, will not have been permitted to vote.
64. An election involves more than a great deal of administrative, logistical, and financial effort – it is also a pivotal date for political and governmental affairs.



65. It flows from this that an election cannot, save in the most extreme of circumstances, be repeated.
66. If the rights of those who are entitled to vote but are precluded from doing so by the unconstitutional legislation are not protected prior to the forthcoming 2009 elections, there is no realistic possibility that there can be another round of elections in which those rights could be protected, or the violation of those rights in any way vindicated.
67. The second premise of the Applicants' case for urgency is equally clear: there is no method other than elections by which the rights of a South African citizen who was entitled to vote but could not vote, could be vindicated. A vote is special. It is by the counting of votes that Parliament is elected, and through Parliament the President. It cannot be equated with or replaced by any of the other rights of political participation that a citizen possesses.
68. This becomes clear if one considers a hypothetical example: a country in which citizens are all granted sweeping powers of political participation – such as the rights of association, to stand as a candidate, to attend Parliament and so on – but denied the vote. Such a country would not be a democracy, because the citizens would not possess the most fundamental tool for enforcing government accountability: the vote.



69. If the Second Applicant in this case, and the many others in a similar situation, are denied the vote, there is no other, later method by which their disenfranchisement can be remedied. This is constitutionally unacceptable and requires urgent consideration.

70. On these bases the First Applicant is advised that this application meets the requirements of Rule 6(12)(b) of the Uniform Rules for urgent applications.

Conclusion

71. The First Applicant submits that a proper case has been made and that it is entitled to the relief sought in the Notice of Motion to which this affidavit is annexed.

72. In particular, in as far as the declaratory order in paragraph 2 of the Notice of Motion is concerned, this Court, by virtue of section 172(1)(a) of the Constitution, is enjoined to grant such relief, and, as far as the order in paragraph 3 is concerned, the First Applicant submits that it would be just and equitable, as that term is used in section 172(1)(b) of the Constitution, to make such an order.

James Selfe

JAMES SELFE

[Handwritten signature]

I certify that the above affidavit was signed and sworn to at **Cape Town** before me on this the 23rd day of **JANUARY 2009** by the deponent after he declared that he knew and understood the contents of this affidavit, that he had no objection to taking the prescribed oath which he regarded as binding on his conscience, and after he uttered the words: "*I swear that the contents of this affidavit are true, so help me God*".

BEFORE ME



COMMISSIONER OF OATHS

FULL NAME:

DESIGNATION:

AREA OF JURISDICTION

Commissioner of Oaths
David Melunsky
Practising Advocate of the Cape Bar
7th Floor, Huguenot Chambers
40 Queen Victoria Street
Cape Town, 8001

