

[REDACTED] Cape Town, South Africa.
Tel: [REDACTED] Fax: [REDACTED]
E-mail: [REDACTED]@greenlife.co.za

14 February 2005

Google, Inc.

Attn: [REDACTED]

Dear Google

DCMA complaint again www.namibiaturism.com

I wish to lodge a complaint against the above website for copying verbatim from my site, www.honeymoon-safari.net, a total of 965 words, 36 images, comments from our past clients as well as design and layout of 3 pages, which is identical to 3 pages on my site.

As a result of this, it appears that google has penalized www.honeymoon-safari.net as the site has disappeared from your SERPS, after holding top positions for over 2 years. I would appreciate if you could please remove any penalty from this site asap, as I have never plagiarised or lifted any work or content from others...ever!

Details of the infringements as follows:

1. Affected URL's on www.honeymoon-safari.net are:

- (i) www.honeymoon-safari.net/index.html
- (ii) www.honeymoon-safari.net/love.html
- (iii) www.honeymoon-safari.net/honeymon_tips.html

2. The copyrighted work at issue is the text, design, layout and images appearing at the following 3 URL's on www.namibiaturism.com

- (i). www.namibiaturism.com/where_to_stay/honeymoon_namibia.asp
197 words matching text, including 2 client comments of our past travelers, 5 images, design & table layout,
- (ii) www.namibiaturism.com/where_to_stay/african_love_food.asp
383 words matching text, 13 images (including one of a director of our company), and complete design and layout.
- (iii) www.namibiaturism.com/where_to_stay/honeymoon_tips.asp
385 words matching text, 18 images, design and layout

3. For Web Search on Google, www.honeymoon-safari.net has ranked between positions 1 and 3 for the keywords "honeymoon safari", "African honeymoon", "African honeymoon safari". The site now does not appear in the google results.

Instead, www.namibiatourism.com is deriving hits from the following search terms for content which has been lifted from my site, as is evident from the details below:

Search Query: african honeymoon (position 15)
Infringing Web www.namibiatourism.com/where_to_stay/honeymoon_namibia.asp
Pages:

Search Query: africa love food (position 2)
Infringing Web www.namibiatourism.com/where_to_stay/african_love_food.asp
Pages:

Search Query: african honeymoon safari (position 12)
Infringing Web www.namibiatourism.com/where_to_stay/honeymoon_namibia.asp
Pages:

Search Query: Honeymoon tips Africa (position 15)
Infringing Web www.namibiatourism.com/where_to_stay/honeymoon_tips.asp
Pages:


4. The owners of the offending site can be contacted at:

Scent of Namibia Tours & Safaris (PTY) Ltd.

[REDACTED] (NAMIBIA)

Tel. [REDACTED] - Fax [REDACTED]

IP Address: 195.137.140.57 (ARIN & RIPE IP search)

IP Location:  England - London - National Italian Network For Terzomillennio

Registrant:

[REDACTED]

Ome, BS 25050

IT

Domain Name: NAMIBIATOURISM.COM

Administrative Contact:

[REDACTED]

Ome, BS 25050

IT

[REDACTED]

[fax]

[REDACTED]@diessenet.com

Technical Contact, Zone Contact:

[REDACTED]
Brescia, BS 25125
IT

[REDACTED] [fax]

[REDACTED]@tzm.it

5. I have a good faith belief that use of the copyrighted materials described above on the allegedly infringing web pages is not authorized by the copyright owner, its agent, or the law.

6. I swear, under penalty of perjury, that the information in the notification is accurate and that I am the copyright owner or am authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.

I trust that the matter will be dealt with in terms of google's commitment to the DMCA to weed out offenders and plagiarists on the web.

Kind regards

[REDACTED]
[REDACTED]@greenlife.co.za

Tel:

Fax:

[REDACTED]
Greenlife