



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

15 February 2005

Google, Inc.

Attn: [REDACTED]

Dear Google

DCMA complaint against www.wydahtours.com.com

I wish to lodge a complaint against the above website for copying verbatim from my site, www.game-reserve.com, a total of 4316 words on 6 different pages, which are identical to the copy on 7 pages on www.game-reserve.com.

As a result of this, Wydah Tours has gained very valuable placing in google SERPS, and is clearly using the content to drive customers to its site and thereby generate revenue, to the detriment of our company, which developed www.game-reserve.com and its entire contents, including all written copy. The site is copyrighted on every page.

Details of the infringements as follows:

1. Affected URL's on www.game-reserve.com are:

- (i) www.game-reserve.com/botswana_okavango-moremi.html
- (ii) www.game-reserve.com/botswana_chobe.html
- (iii) www.game-reserve.com/botswana_linyanti.html
- (iv) www.game-reserve.com/botswana_makgadikgadi.html
- (v) www.game-reserve.com/botswana_mashatu.html
- (vi) www.game-reserve.com/botswana_nxai-pan.html
- (vii) www.game-reserve.com/botswana_nxai-pan.html

2. The copyrighted work at issue is the text reproduced verbatim on the following URL's on **www.wydahtours.com**

(i).

www.wydahtours.com/countryinfo/okavango%20and%20moremi%20information.htm

1239 words matching text from www.game-reserve.com/botswana_okavango-moremi.html

(ii)

www.wydahtours.com/countryinfo/chobe%20information.htm

674 words matching text from www.game-reserve.com/botswana_chobe.html

(iii)

www.wydahtours.com/countryinfo/linyanti%20and%20savuti%20information.htm

456 words matching text from www.game-reserve.com/botswana_linyanti.html

(iv).

www.wydahtours.com/countryinfo/makgadikgadi%20information.htm

844 words matching text from www.game-reserve.com/botswana_makgadikgadi.html

(v)

www.wydahtours.com/countryinfo/the%20tuli%20block%20information.htm

638 words matching text from www.game-reserve.com/botswana_mashatu.html

(vi)

www.wydahtours.com/countryinfo/

www.wydahtours.com/countryinfo/makgadikgadi%20information.htm

465 words matching text from www.game-reserve.com/botswana_nxai-pan.html

3. For Web Search on Google, www.game-reserve.com has ranked well on Google SERPS for a variety of search terms.

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

Search Query:	okavango moremi information (position 1)
Infringing Web	www.wydahtours.com/countryinfo/
Pages:	okavango%20and%20moremi%20information.htm

Search Query:	Chobe information (position 1)
Infringing Web	www.wydahtours.com/countryinfo/chobe%20information.htm
Pages:	

Search Query:	Linyanti information (position 4)
Infringing Web	www.wydahtours.com/countryinfo/
Pages:	linyanti%20and%20savuti%20information.htm

Search Query:	Makgadikgadi information (position 1)
Infringing Web	www.wydahtours.com/countryinfo/
Pages:	makgadikgadi%20information.htm

Search Query: Tuli block information (position 1)
Infringing Web www.wydahtours.com/countryinfo/
Pages: the%20tuli%20block%20information.htm

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

Tel: [REDACTED]
Fax: [REDACTED]
E-mail: [REDACTED]@wydahtours.com
Website: www.wydahtours.com

IP Address: 66.98.148.72 (ARIN & RIPE IP search)
IP Location: [REDACTED] Texas - Houston - Everyones Internet Inc
Name Server: DNS8.WEBONLINE.BIZ DNS2.WEBONLINE.BIZ
ICANN Registrar: NETWORK SOLUTIONS, LLC.
Created: 10-aug-2000
Expires: 10-aug-2005
Status: REGISTRAR-LOCK

Registrant:
Wydah Tours (WYDAHTOURS-DOM)
[REDACTED]
Retreat
Cape Town, Western Cape 7965
ZA
Domain Name: WYDAHTOURS.COM
Administrative Contact:
Domain Registration Service (DR1793-ORG)
[REDACTED]@wildnetafrica.com

Domain Registration Service

[REDACTED]
Pretoria, Gauteng 0040
ZA

Technical Contact:
Network Solutions, LLC. (HOST-ORG)
[REDACTED]@networksolutions.com

[REDACTED]
Herndon, VA 20171-3025
US

Record expires on 10-Aug-2005.
Record created on 10-Aug-2000.
Domain servers in listed order:
DNS8.WEBONLINE.BIZ
DNS2.WEBONLINE.BIZ

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:



Greenlife