



[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.south-african-lodges.com

I wish to lodge a complaint against the above website for copying verbatim from my site, www.game-reserve.com, a total of 4779 words and replicating them on 8 different pages, which are identical to the copy on 10 pages on www.game-reserve.com.

As a result of this, www.South-African-Lodges.com has gained very valuable placing in google SERPS, and is clearly using the content to drive customers to its site and thereby generate revenue, as well as to appear to be an authoritative source of reference, to the detriment of our company which developed www.game-reserve.com and its entire contents. Our site is copyrighted on every page, and the historical claim to the content on www.game-reserve.com can be validated at the Web Archive (<http://www.archive.org>).

Details of the infringements as follows:

1. Affected 10 affected URL's on www.game-reserve.com are:

- (i) http://www.game-reserve.com/south-africa_kruger-park.html
- (ii) http://www.game-reserve.com/south-africa_sabi-sand.html
- (iii) http://www.game-reserve.com/south-africa_st-lucia.html
- (iv) http://www.game-reserve.com/south-africa_phinda.html
- (v) http://www.game-reserve.com/south-africa_addo.html
- (vi) http://www.game-reserve.com/south-africa_garden-route.html
- (vii) http://www.game-reserve.com/south-africa_cedarberg.html
- (viii) http://www.game-reserve.com/south-africa_pilanesberg.html
- (ix) http://www.game-reserve.com/south-africa_welgevonden.html
- (x) http://www.game-reserve.com/south-africa_madikwe.html

2. The copyrighted work at issue is the text appearing at the following 8 URL's on **www.south-african-lodges.com**:

- (i). **<http://www.south-african-lodges.com/area-kruger-national-park.php>**
444 words & matching text, copied verbatim.
- (ii) **<http://www.south-african-lodges.com/area-kruger-national-park.php>**
971 words & matching text, copied verbatim.
- (iii) **<http://www.south-african-lodges.com/area-kwazulu-natal.php>**
316 words & matching text, copied verbatim.
- (iv). **<http://www.south-african-lodges.com/area-kwazulu-natal.php>**
278 words & matching text, copied verbatim.
- (v) **<http://www.south-african-lodges.com/area-eastern-cape.php>**
575 words & matching text, copied verbatim.
- (vi) **<http://www.south-african-lodges.com/area-garden-route.php>**
752 words & matching text, copied verbatim.
- (vii). **<http://www.south-african-lodges.com/area-cederberg-karoo.php>**
589 words & matching text, copied verbatim.
- (viii) **<http://www.south-african-lodges.com/area-sun-city.php>**
473 words & matching text, copied verbatim.
- (ix) **<http://www.south-african-lodges.com/area-waterberg-welgevonden.php>**
326 words & matching text, copied verbatim.
- (x). **<http://www.south-african-lodges.com/area-madikwe.php>**
333 words & matching text, copied verbatim.

3. For Web Search on Google, www.game-reserve.com has ranked extremely well for searches for information on the particular wildlife parks and regions detailed in the plagiarised pages, but its listings now appear to have been replaced by results from www.south-african-lodges.com.

Instead, www.south-african-lodges.com is deriving hits from the following search terms for content which has been lifted from our site, as is evident from the details below:

Search Query: Infringing Web Pages:	kruger national park area information (position 14) www.south-african-lodges.com/area-kruger-national-park.php
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Search Query: Infringing Web Pages:	kwazulu natal area information (position 1) www.south-african-lodges.com/area-kwazulu-natal.php
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Search Query: Infringing Web Pages:	greater addo national park information (position 5) www.south-african-lodges.com/area-eastern-cape.php
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Search Query: Infringing Web Pages:	Garden Route Area Information (position 5) www.south-african-lodges.com/area-garden-route.php
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Search Query: klein karoo area information (position 1)
Infringing Web: www.south-african-lodges.com/area-cederberg-karoo.php
Pages:

Search Query: pilanesberg area information (position 1)
Infringing Web: www.south-african-lodges.com/area-sun-city.php
Pages:

Search Query: welgevonden area information (position 1)
Infringing Web: www.south-african-lodges.com/area-sun-city.php
Pages:

Search Query: madikwe area information (position 1)
Infringing Web: www.south-african-lodges.com/area-madikwe.php
Pages:

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

Contact Person: [REDACTED]

Address:

[REDACTED]

Cape Town, South Africa

Tel: [REDACTED]

Mobile: [REDACTED]

Fax: [REDACTED]

E-mail: [REDACTED]@golfing-safaris.com

WHOIS DETAILS:

Owner Contact:

[REDACTED]
The Forge Web Creations

[REDACTED]
Cape Town, Cape Town, 7708, South Africa

RACE Name: south-african-lodges.com
Punycod Name: south-african-lodges.com
Unicode Name: south-african-lodges.com
Status: ACTIVE

Admin Contact

[REDACTED] (RM1100-ABC)
South African Golfing And Safari Tours
[REDACTED]@golfing-safaris.com
[REDACTED]
Cape Town, Za, 7700, South Africa

phone: [REDACTED]

Technical Contact, Zone Contact
Domain Administrator (DA1-ABC)
Hetzner Africa
[REDACTED]@hetzner.co.za

Durbanville, South Africa, 7551, South Africa
phone: [REDACTED]
fax: [REDACTED]

Record last updated on: 2005-03-29 11:13:06
Record expires on: 2005-11-13 01:19:18

Domain servers in listed order:

ns4a.your-server.co.za 196.7.147.4
nsa.second-ns.co.za

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]

[REDACTED]@greenlife.co.za

Tel: [REDACTED]

Fax: [REDACTED]

[REDACTED]

Greenlife