



Decision

ZA ZA2015-0209

**.ZA ALTERNATE DISPUTE
RESOLUTION REGULATIONS**

(GG29405)

ADJUDICATOR DECISION

CASE NUMBER:	ZA2015-0209
DECISION DATE:	29 September 2015
DOMAIN NAME	FLYSAAEXPRESS.CO.ZA SAAEXPRESS.CO.ZA SAAAIRLINES.CO.ZA SAAAIRWAYS.CO.ZA SAAAIRLINK.CO.ZA FLYMAMGO.CO.ZA SAALINK.CO.ZA
THE DOMAIN NAME REGISTRANT:	RYZHOV VOLODYMYR
REGISTRANT'S LEGAL COUNSEL:	N/A
THE COMPLAINANT:	SOUTH AFRICAN AIRWAYS (PTY) LIMITED
COMPLAINANT'S LEGAL COUNSEL:	ADAMS & ADAMS
2 nd LEVEL ADMINISTRATOR:	ZA CENTRAL REGISTRY (CO.ZA)

1 Procedural History

a) The Dispute was filed with the South African Institute of Intellectual Property Law (the "SAI IPL") on **22 July 2015**. On **28 July 2015** the SAI IPL transmitted by email to the ZA Central Registry (ZACR) a request for the registry to suspend the domain name(s) at issue, and on **28 July 2015** ZACR confirmed that the domain name had indeed been suspended. The SAI IPL verified that the Dispute satisfied the formal requirements of the .ZA Alternate Dispute Resolution Regulations (the "Regulations"), and the SAI IPL's Supplementary Procedure.

b) In accordance with the Regulations, the SAI IPL formally notified the Registrant of the commencement of the Dispute on **29 July 2015**. In accordance with the Regulations the due date for the Registrant's Response was **27 August 2015**. On the **03 August 2015**, the Registrant contacted the Domain Name Dispute Case Administrator, Mrs Thabelo Mulaudzi, setting out a reply to the Complainant's founding complaint and evidence. The Case Administrator informed the Registrant that the response received was not a proper response as required by Regulation 18.

Subsequent to the Registrant's response, on **21 August 2015**, the Complainant's attorneys, Adams and Adams, requested that the appointment of an adjudicator being postponed in light of the possible settlement of the matter between the parties. The settlement agreement due date was set for **4 September 2015**. On **2 September 2015**, the Complainant's attorneys informed the Case Administrator that the negotiations between the parties had broken down and therefore requested that the Case Administrator appoint an Adjudicator accordingly.

Despite the Case Administrator's notification to the Registrant on **3 August 2015**, the Registrant failed to submit a proper response as required by Regulation 18 by **27 August 2015**.

c) The Complainant did not submit any formal Reply.

d) The SAI IPL appointed **NOLA BOND** as the Adjudicator in this matter on **14 September 2015**. The Adjudicator has submitted the Statement of Acceptance

and Declaration of Impartiality and Independence, as required by the SAIPL to ensure compliance with the Regulations and Supplementary Procedure.

2 Factual Background

2.1 The Complainant is SOUTH AFRICAN AIRWAYS (PTY) LIMITED, the owner of the South African Airways. The airline was founded in 1934 and according to the Complainant's uncontested facts is the national flag carrier and largest airline in South Africa. The company, Mango Airlines (Pty) Limited, is a subsidiary of the Complainant and was founded in 2006.

2.2 The Complainant and its subsidiary, Mango Airlines (Pty) Limited, are the proprietors of the following pertinent South African trade mark registrations:

- Trade mark registration no. 2002/03773 SOUTH AFRICAN AIRWAYS in class 39
- Trade mark registration no. 2002/03771 SAA in class 39
- Trade mark registration no. 2006/05638 FLY MANGO in class 39

2.3 The Complainant is the proprietor of the following relevant domain names:

- flysaa.com
- flymango.com

From the respective domain names and hosted webpages, visitors may book flights and manage travel schedules. The Complaint averred that the www.flysaa.com receives 40 000 visitors per day and 1.2 million visitors per month.

The Complainant in addition to the above domain names also operates in the social media arena, where it was averred that the Complainant's Facebook page has approximately 175 000 likes and 80 000 Twitter followers.

2.4 It was submitted by the Complainant that as a result of their extensive advertising and history in South Africa and internationally, in all forms of media including radio, television and internet, the trade marks SOUTH AFRICAN AIRWAYS, SAA and FLYMANGO are classified as well-known marks within the meaning as provided for

by the South African Trade Marks Act No 194 of 1993.

In addition, the Complaint claims common law rights to the marks SOUTH AFRICAN AIRWAYS, SAA and FLYMANGO.

- 2.5 In and during April 2015, it was brought to the Complainant's attention that the Registrant had registered the domain name **FLYMAMGO.CO.ZA**

The Complainant upon becoming aware of the registration of the domain name dispatched a letter of demand to the Registrant on 29 April 2015 claiming transfer of the domain name on the basis of the Complainant's trade mark rights and that the Registrant's registration of the domain name was an abusive registration. No response was received from the Registrant.

A further letter of demand concerning the domain name FLYMAMGO.CO.ZA was addressed to the Registrant on 18 May 2015.

On 5 June 2015, the attorneys for the Complainant addressed a further letter of demand to the Registrant dealing with the domain names FLYSAAEXPRESS.CO.ZA; SAAEXPRESS.CO.ZA; SAAAIRLINES.CO.ZA; SAAAIRWAYS.CO.ZA; SAALINK.CO.ZA and SAAAIRLINK.CO.ZA

On 29 July 2015, the Registrant forwarded a response to the attorneys for the Complainant wherein the Registrant averred that no correspondence was ever received from the attorneys for the Complainant and requested that the Complainant furnish them with their grounds of objection.

The attorneys for the Complainant advised the Registrant that the letters had been forwarded to the email address RYZHOV@HOTMAIL.COM which was the email address provided on the WHOIS information sheet for the disputed domain names.

- 2.6 On 03 August 2015 the Registrant forwarded a response to the Case Administrator, wherein he stated that he had never received any correspondence from the Complainant prior to the being served with the Complainant's founding complaint and evidence. In the Registrant's response they denied that the domain name registrations were abusive or were being used in bad faith. The Registrant further

averred that the attorneys for the Complainant had fabricated evidence and were attempting to mislead the Adjudicator.

Whilst the Registrant failed to submit a formal reply to the Complaint's founding complaint and evidence, the Adjudicator will, in the interest of natural justice, deal with the Registrant's contentions as contained in his response of 3 August 2015.

3 Parties' Contentions

3.1 Complainant

- a) The Complainant contends that the Registrant's domain names FLYSAAEXPRESS.CO.ZA; SAAEXPRESS.CO.ZA; SAAAIRLINES.CO.ZA SAAAIRWAYS.CO.ZA; SAAAIRLINK.CO.ZA ; SAALINK.CO.ZA; FLYMAMGO.CO.ZA are identical and/or confusingly similar to the Complainant's registered trade marks, SOUTH AFRICAN AIRWAYS, SAA and FLYMANGO as the domain names are visually and phonetically similar and wholly incorporate the Complainant's trade marks, in particular, SAA and FLYMANGO.

The Complainant also contends that the domain names are identical or similar to marks in which they have common law rights. Such rights fall within the Regulation 3(1)(a) as held in ZA2007-0001.

Furthermore, the Complainant submits that the Registrant's disputed domain names make use of words such as FLY, EXPRESS, AIRLINK and AIRWAYS which relate to air transportation services which are offered by the Complainant.

With regard to the domain name, FLYMAMGO.CO.ZA, the Complainant contends that the domain name is virtually identical to the trade mark FLY MANGO and the domain name FLYMANGO.COM.

- b) The Complainant contends that as a result of its extensive use , reputation and registered rights in the marks, SOUTH AFRICAN AIRWAYS, SAA and FLYMANGO, the registration of the domain name by the Registrant constitutes an abusive registration in terms of Regulation 3(1)(a) in that the Registrant has registered the domain name primarily to:
- 1) Disrupt unfairly the business of the complainant [Regulation 4(1)(a)(iii)] by misleading potential users by means of using confusingly similar domain names, typo-squatting and advertising transportation services similar to the Complainant;
 - 2) Registered, the domain name in a way that leads people or businesses to believe that the domain name is registered to, operated or authorised by, or otherwise connected with the complainant [Regulation 4(1)(b)]
- c) The Complainant, furthermore, submits that the domain name is abusive in that it is unfairly detrimental and takes unfair advantage of the Complainant's rights. In this regard the Complainant submits that the Registrant is deriving advertising revenue by deliberately attempting to attract internet users by creating confusion using the Complainant's trade marks. The Complainant contends that the Registrant's advertising revenue service does not amount to a good faith offering of goods or services.
- d) Finally the Complainant drew the Adjudicator's attention to the SAIPL case no. ZA2011-00100 wherein the Registrant in the dispute was in fact the same Registrant in the present matter. In this regard the Complainant relies upon Regulation 4(1)(c) in that the registration of a domain name may be considered to be abusive where the Registrant is engaged in a pattern of registering domain names.

3.2 Registrant

- a) The Registrant contends that he had no knowledge of the Complainant's intellectual property prior to 29 July 2015.

The Registrant, furthermore, contends that the domain names are not being used in bad faith or in a way that would harm the intellectual property rights of the Complainant. It can therefore be inferred that the Registrant relies on the defence in Regulation 5(i)(a) which states:

"Factors, which may indicate that the domain name is not an abusive registration, include (a) before being aware of the complainant's cause for complaint, the registrant has (i) used or made demonstrable preparations to use the domain name in connection with a good faith offering of goods or services"

The Registrant submits that the domain names consist of English words and cannot be recognised as domain names which are related to the Complainant. In particular the Registrant submits that the domain name FLYMAMGO.CO.ZA consists of the three ordinary English words FLY, MAM (being a synonym for "mother") and GO. The Registrant contends that as the Complainant does not have a trade mark for the combination of the words FLYMAMGO, the domain name cannot be recognised as being associated or confusingly similar to the Complainant's registered trade mark FLYMANGO. In this regard it may be inferred that the Registrant relies on the defence in Regulation 5(b) which states:

"Factors, which may indicate that the domain name is not an abusive registration, include (b) the domain name is used generically or in a descriptive manner and the registrant is making fair use of it."

From the Registrant's response it may be further inferred that he submits that his use of the domain name is fair as provided for by Regulation 5(c) which states:

"Factors, which may indicate that the domain name is not an abusive registration, include that the registrant has demonstrated fair use, which use may include web sites operated solely in tribute to or fair criticism of a person or business..."

The Registrant in dealing with the factual background of the dispute put

forward that he did not receive any correspondence prior to 29 July 2015 and that the Complainant is attempting to mislead the Adjudicator by presenting falsified letters of demand. As the Regulations do not require that prior notification be sent before the institution of domain name dispute proceedings, the submission will not be dealt with by the Adjudicator. The Respondent had sufficient notification of the dispute and failed to file a proper response, as such the Adjudicator finds that the Registrant was not prejudiced.

The Adjudicator furthermore, is not in a position, and it would not be proper to do so, to deal with the allegation that the Complainant is attempting to mislead the Adjudicator. The founding papers as filed by the Complainant comply with the Regulations and are found to be in proper order. As such, the Registrant's allegation is found to be without merit.

In summary, the Registrant contends that:

- 1) The ownership of the domain names is bona fide;
- 2) That the Registrant has not violated the rights of the Complainant;
- 3) The domain names, although similar, are not confusingly similar to the Complainant's trade marks SAA, SOUTH AFRICAN AIRWAYS or FLYMANGO;
- 4) That the registration of the domain names was not abusive.

4.1 Complainant's Rights

- 4.1.1 The Complainant, and its subsidiary Mango Airlines (Pty) Limited, submit that they own the trade marks, SOUTH AFRICAN AIRWAYS, SAA and FLYMANGO which are registered and that a reputation subsists in the business to which the trade marks are applied.

- 4.1.2 The dominant element of the domain names, FLYSAAEXPRESS.CO.ZA; SAAEXPRESS.CO.ZA; SAAAIRLINES.CO.ZA SAAAIRWAYS.CO.ZA; SAAAIRLINK.CO.ZA and SAALINK.CO.ZA is identical to the Complainant's trade mark registration for the trade mark, SAA. The domain names do contain further elements, namely the words FLY, EXPRESS, AIRLINES, AIRWAYS and AIRLINK. However, the elements are descriptive and the memorable feature of the domain names remains SAA.
- 4.1.3 In terms of Regulation 5(c) states "*the burden of proof shifts to the registrant to show that the domain name is not an abusive registration if the domain name (not including the first and second level suffixes) is identical to the mark in which the complainant asserts rights, without any addition;*"
- In decision ZA2012-0114, the Adjudicator held that although the domain name WALTONSJHB.CO.ZA incorporated the registered mark, WALTONS, the addition of the abbreviation JHB was a further addition and therefore the burden remained with the Complainant to show that the registration was abusive.
- In the circumstances, the addition of the words FLY, EXPRESS, AIRLINES, AIRWAYS and AIRLINK are further additions in terms of Regulation 5(c) and, as such, the burden remains with the Complainant to show that the registrations of the domain names FLYSAAEXPRESS.CO.ZA; SAAEXPRESS.CO.ZA; SAAAIRLINES.CO.ZA SAAAIRWAYS.CO.ZA; SAAAIRLINK.CO.ZA is abusive.
- 4.1.4 The Complaint's subsidiary, Mango Airlines (Pty) Limited, is the proprietor of the mark FLYMANGO. It should be pointed out at this junction that the subsidiary, Mango Airlines (Pty) Limited, was not cited in the heading as a Complainant although in the body of the Complaint they are fully listed and discussed.

As stated above, in terms of Regulation 5(c) the burden only shifts to the Registrant where the domain name is identical without any further

addition. As the domain name FLYMAMGO.CO.ZA is not identical to the Complainant's subsidiary's registered trade mark, FLYMANGO, the burden remains with the Complainant to show that the registration of the domain name FLYMAMGO.CO.ZA is abusive.

4.2 Abusive Registration

4.2.1 An abusive registration means a domain name which either:-

- (i) Was registered or otherwise acquired in a manner which, at the time when the registration or acquisition took place, took unfair advantage of or was unfairly detrimental to the Complainants' rights; or
- (ii) Has been used in a manner that takes unfair advantage of, or is unfairly detrimental to the Complainants' rights.

The Complainant is required to prove, on a balance of probabilities, that the required elements are present.

4.2.2 In terms of Regulation 4(1), factors which may indicate that the Domains are abusive registrations include circumstances indicating that the registrations were primarily to:-

- (a)
 - (i) ...
 - (ii) ...
 - (iii) Disrupt unfairly the business of a Complainant;
 - (iv) ...
- (b) Circumstances indicating that the registrant is using, or has registered, the domain name in a way that leads people or businesses to believe that the domain name is registered to, operated or authorised by, or otherwise connected with the Complainant.
- (c) Evidence, in combination with other circumstances indicating that the domain name in dispute is an abusive registration, that the registrant is engaged in a pattern of making abusive registrations.

4.2.3 **Regulations 4(1)(a)(iii)**

No evidence was submitted that the registration of the domain names was done with the primary intention of disrupting the Complainant's business. Furthermore, no evidence was submitted that showed that the domain names actually disrupted or disrupt the business of the Complainant. However, the effect of the registration of the domain names FLYSAAEXPRESS.CO.ZA; SAAEXPRESS.CO.ZA; SAAAIRLINES.CO.ZA; SAAAIRWAYS.CO.ZA; SAAAIRLINK.CO.ZA; SAALINK.CO.ZA and FLYMAMGO.CO.ZA by the Registrant has the effect that internet users are unable to reach or are diverted away from the Complainant's legitimate domain names, FLYSAA.COM and FLYMANGO.COM. Furthermore, the advertising of competitor links on the websites hosted on the domain names has the effect of diverting internet traffic which is intended for the Complainant to Competitors. The diversion of such traffic disrupts the business of the Complaint and logically will result in a loss of sales revenue. Given that the registration of the domain names unfairly disrupts the business of the Complainant, the disputed domain names are found to be abusive registrations.

In support of the above findings, in decisions ZA ZA2014-0161 and ZA2014-0187 the Adjudicators found that the diversion of traffic away from the Complainants was sufficient to show that the registration unfairly disrupted the Complainants' businesses.

4.2.4 **Regulation 4(1)(b)**

Regulation 4(1)(b) states "*factors which may indicate that the domain name is an abusive registration includes circumstances indicating that the registrant is using, or has registered, the domain name in a way that leads people or businesses to believe that the domain name is registered to, operated or authorised by, or otherwise connected with the Complainant.*"

The Complainant is the proprietor of the domain names FLYSAA.COM and FLYMANGO.COM.

The websites hosted on the disputed domain name contain a number of click-through advertisements relating to cheap flights in South Africa and Europe. The website hosted on FLYMAMGO.CO.ZA furthermore makes specific reference to Mango Flights and Mango Airline Bookings.

It is a well established legal principle that a domain name that comprises of a trade mark coupled with a generic term is still confusingly similar to the trade mark. In this regard, the Adjudicator agrees with the findings in SAIPL decisions ZA2007- 0003 Telkom SA Limited v Cool Ideas 1290 CC and ZA2007-0004 Telkom SA Limited and TDS Directory Operations (Pty) Ltd v The Internet Corporation.

In case no. ZA2007/0003, it was held that actual confusion is not necessary and that the potential or likelihood of confusion would be sufficient. In this regard the Adjudicator therein referred to, with approval, the foreign decisions in WIPO/D2000-0777, WIPO/D2000-878, NAF/FA95033 and NAF/FA95402. It was further held that confusion may be inferred in situations where the Registrant registered a domain name containing the Complainant's name or mark together with a generic term.

In *Plascon-Evans Paints Ltd v Van Riebeeck Paints (Pty) Ltd* 1984 3 SA 623 (A) 640 the court stated:

"In an infringement action the onus is on the plaintiff to show the probability or likelihood of deception or confusion. It is not incumbent upon the plaintiff to show that every person interested or concerned (usually as customer) in the class of goods for which his trade mark has been registered would probably be deceived or confused. It is sufficient if the probabilities establish that a substantial number of such persons will be deceived or confused. The concept of deception or confusion is not limited to inducing in the minds of interested persons the erroneous belief or impression that the goods in relation to which the defendant's mark is used are the goods of the proprietor of the registered mark, i.e. the plaintiff, or that there is a material connection between the defendant's

goods and the proprietor of the registered mark; it is enough for the plaintiff to show that a substantial number of persons will probably be confused as to the origin of the goods or the existence or non-existence of such a connection.”

The Registrant put forward that the domain names FLYSAAEXPRESS.CO.ZA; SAAEXPRESS.CO.ZA; SAAAIRLINES.CO.ZA SAAAIRWAYS.CO.ZA; SAAAIRLINK.CO.ZA; incorporated common English words and that the domain FLYMAMGO.CO.ZA was not confusingly similar to the registered mark FLYMANGO when broken down into its various syllables. The Adjudicator fails to see firstly how the element SAA may be a considered to be a common English word. Whilst the words EXPRESS, AIRLINES, AIRWAYS and AIRLINK are English words, these words are generic and/or descriptive and do not serve to mitigate the likelihood of confusion which arises as a result of the incorporation of the Complainant’s registered trade mark, SAA. In this regard see South African decisions ZA2012-0114 & ZA2010-0061 and WIPO case no. D20020810 *Benetton Group SpA v Azra Khan*.

Secondly, on a balance of probabilities, internet users are unlikely to view the domain name FLYMAMGO.CO.ZA in its separate elements, but rather will view the domain name as a whole. In this regard see *Cowbell AG v ICS Holdings Ltd* [2001] ZASCA 18, wherein the Supreme Court held that trade marks must be globally appreciated. The same principles are equally applicable to domain names.

The addition of the letter “M” to the domain name is insufficient to differentiate the domain name FLYMAMGO.CO.ZA from the registered trade mark FLYMANGO and its addition appears to a straightforward case of “typo-squatting”. This is especially in light of the fact that the letter M is located immediately adjacent to the letter N on a standard QWERTY keyboard. Typo-squatting has been found in a number of cases to constitute an abusive registration. See for instance local case decisions ZA 2012 – 0107 and ZA2007-0006.

It is likely that a substantial number of persons when entering the Registrant's websites hosted on the disputed domain names will be confused or be deceived into believing that the Registrant's websites and domain names are associated or connected in some manner with the Complainant or that the advertisements, as appearing on the website, are placed there with the approval of the Complainant.

In light of the above, the Adjudicator finds that in terms of Regulation 4(1)(b) the Registrant has both registered the domain names and is using the domain name in such a manner that it is likely to lead people or businesses to believe that the domain name is registered to, operated or authorised by, or otherwise connected with the Complainant or its subsidiary.

The registration of the domain name is therefore abusive in terms of Regulation 4(1)(b).

4.2.5 **Regulation 4(1)(c)**

Regulation 4(1)(c) states "*factors which may indicate that the domain name is an abusive registration includes evidence, in combination with other circumstances indicating that the domain name in dispute is an abusive registration, that the registrant is engaged in a pattern of making abusive registrations.*"

It was submitted by the Complainant that the Registrant in this matter, namely one, **RYZHOV VOLODYMYR**, was the Registrant in case no. ZA2011-0100 *Pick n Pay Retailers (Pty) Limited v Ryzhov Volodymyr*. In this case the Registrant had registered the domain name PICKNPAYHYPER.CO.ZA. The domain name dispute was settled between the parties and a notice of withdrawal of the complaint was issued on 1 December 2011. The Adjudicator further notes that the Registrant was involved in an earlier domain name dispute, namely case ZA2010-0062, wherein the Registrant had registered the domain name KWIKHOT.CO.ZA.

Despite the fact that the cases were both settled and complaints withdrawn, it is necessary to take cognisance of the fact the Registrant has previously been involved in domain name disputes in South Africa regarding well known South African trade marks.

In WIPO case D2008-1560, the Panel took into account the conduct of the Respondent and the fact that he was or had been involved in a number of domain name disputes. In holding that the Respondent had registered and was using the domain name in bad faith, the Panel stated that the Respondent "*has engaged in a pattern of conduct involving the disregard of the trademark rights of others.*" In Nominet case DRS 002806 the Expert found that the Registrant's conduct in registering multiple domain names which contained a registered trade mark constituted a pattern of conduct.

From the evidence presented by the Complainant, it appears that the Registrant has previously registered domain names incorporating well-known South African registered trade marks. The registration of domain names incorporating well known trade marks cannot simply be ignored or put down to pure co-incidence. The Registrant therefore appears to be engaging in a practice of registering domain names which contain well-known South Africa trade marks with the view to generating revenue from click through advertising. The pattern of conduct can be said to take unfair advantage of the reputation or distinctive character of the trade marks concerned. Such conduct is abusive and the Adjudicator therefore finds on a balance of probabilities that the registration is abusive taking into account Regulation 4(1)(c).

5. The Registrant's defences in terms of Regulations 5(1)(a); 5(b) and 5(c)

5.1 As the Adjudicator has already found that the domain names FLYSAAEXPRESS.CO.ZA; SAAEXPRESS.CO.ZA; SAAAIRLINES.CO.ZA; SAAAIRWAYS.CO.ZA; SAAAIRLINK.CO.ZA; SAALINK.CO.ZA and FLYMAMGO.CO.ZA are abusive registrations it is not necessary to deal with the Registrant's inferred

defences in detail.

However, it is important to note that in terms of Regulations 5 (1)(a) and 5(c) the Registrant failed to put forward any evidence as to how the domain names were being fairly used or were being used in connection with a good faith offering of goods or services. As pointed out by the Complainant, the only websites hosted upon the disputed domain names related to other competitor services and generated income for the Registrant by means of click-through advertising. In WIPO Case No. D2007-1856 *Shaw Industries Group Inc. and Columbia Insurance Company v. Rugs of the World Inc*, the Adjudicator found that generating revenue by means of click-through advertising "*does not constitute use of the disputed domain name in connection with a bona fide offering of goods or services within the meaning of paragraph 4(c)(i) of the Policy.*" The principle of the decision is equally applicable in the present circumstances.

With regard to Regulation 5(b) the Adjudicator has already dealt with the fact that domain names are not being used generically or in a descriptive manner and the registrant is furthermore using the domain names in such a manner that they are taking unfair advantage of or are using the domain names in a manner which unfairly detrimental to the Complainant's and their subsidiary's rights in their registered trade marks SAA and FLYMANGO.

DECISION

6.1 For all the foregoing reasons, and in accordance with Regulation 9, the Adjudicator orders that the domain names, FLYSAAEXPRESS.CO.ZA; SAAEXPRESS.CO.ZA; SAAAIRLINES.CO.ZA; SAAAIRWAYS.CO.ZA; SAAAIRLINK.CO.ZA; SAALINK.CO.ZA and FLYMAMGO.CO.ZA be transferred to the Complainant.

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NOLA BOND

SAIPL SENIOR ADJUDICATOR

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