

DECISION

Date of ruling	: 18 February 2022
Case number	: 2021/01
Appellant	: Albers Mijdrecht Assurantiën B.V.
Respondent	: Foundation for Internet Domain Registration in the Netherlands
Appeal against	: Decision by the Foundation for Internet Domain Registration in the Netherlands dated 15 June 2021
Regarding	: Refusal of a request to annul a change to the registrant of the domain name albersmijdrecht.nl

Introduction

- 1.1 In an e-mail sent at 13:37 CEST on 9 July 2021, legal counsel representing the Appellant appealed to the Complaints and Appeals Board for .nl Domain Names (referred to below as "the C&AB") against the decision of the Foundation for Internet Domain Registration in the Netherlands (referred to below as "SIDN") dated 15 June 2021 to refuse the Appellant's request to annul a change to the registrant of the domain name albersmijdrecht.nl (referred to below as "the contested decision"). The contested decision was communicated to legal counsel representing the Appellant by means of an e-mail sent by SIDN at 11:13 CEST on 15 June 2021.
- 1.2 The contested decision concerned a change to the registrant of the domain name albersmijdrecht.nl (referred to below as "the contested domain name") from Albers Mijdrecht Assurantiën B.V. to the current registrant, made on 31 August 2017 on the basis of Article 9 of the General Terms and Conditions for .nl Registrants (referred to below as "the Terms and Conditions").

Appeal proceedings

- 1.3 The parties submitted the following documents:
- Appeal document from the Appellant, received on 9 July 2021, with two attachments
 - Response document from SIDN dated 26 August 2021 with nine accompanying submissions
 - Supplementary appeal document from the Appellant dated 16 September 2021, with one attachment
 - Supplementary response document from SIDN dated 30 September 2021
 - E-mail from legal counsel representing the Appellant dated 25 November 2021
 - E-mail from SIDN dated 26 November 2021
- 1.4 The appeal was considered at the C&AB hearing of 30 November 2021. Prior to the hearing, the Parties had indicated that they did not wish to attend the hearing or make further representations in person.

Appellant's case

- 2.1 In the appeal document, the Appellant petitions the C&AB to annul the contested decision and to honour the Appellant's request (understood by the C&AB to mean the request to annul the registrant change), thus recognising the Appellant as the 'rightful' registrant of the contested domain name.
- 2.2 In support of that petition, the Appellant makes the arguments summarised below.
- 2.3 The change to the registrant of the contested domain name in 2017 was an irregular procedure, insofar as it did not involve the Appellant's cooperation, as required. The Appellant asserts that SIDN recognises the irregularity in the contested decision. SIDN's decision not to reverse the registrant change cannot be justified by SIDN's argument that reversal of the registrant change would be socially unacceptable.

- 2.4 The Appellant takes the view that very strict criteria must be met for reversal to be deemed "socially unacceptable". The applicable provisions are intended for use only in exceptional circumstances. The Appellant argues that such circumstances do not exist in this case. The Appellant additionally asserts that, in its justification of the contested decision, SIDN makes certain incorrect assumptions regarding the circumstances of the case. It is not correct, the appeal document continues, that the Appellant does not have (or no longer has) a substantial interest in the registration of the contested domain name, due to the domain name's correspondence to the trading name of the current registrant, who claims to have acquired it under a purchase contract. Under the contract in question, it is asserted, the current registrant merely has a (non-exclusive) right to use the trading name in question. The trading name itself was and remains the property of the Appellant. In support of that assertion, the Appellant submitted a recent extract from the Chamber of Commerce Trade Register, which mentions both the Appellant's trading name and the contested domain name.
- 2.5 SIDN's counterargument is that the registrant change took place several years ago, in 2017, and that no objection to the change was made at that time. However, the Appellant claims not to have been made aware that the contested domain name had been transferred to the current registrant. The reason for that, according to the Appellant, is that the change was made in contravention of the applicable rules, without the cooperation of the former registrant. The Appellant asserts that someone acting for the current registrant arranged the change, without informing the Appellant. The Appellant adds that, until December 2020, the Appellant was able to make unfettered use of the contested domain name, with the result that there was no reason for the Appellant to suppose that the contested domain name had been transferred to another registrant. It was not until the Appellant was denied access to e-mail by the current registrant on 12 January 2021 that the Appellant began investigating and discovered that the contested domain name was no longer registered to the Appellant. Hence, the time interval between the Appellant's discovery of the registrant change and the steps taken to secure reversal do not, the Appellant contends, support the conclusion that the Appellant accepted the change.
- 2.6 In response to SIDN's argument that the current registrant made a substantiated claim to have been using the contested domain name since 2017, the Appellant argues that, insofar as that claim was valid, the Appellant could make a similar claim. The Appellant, the Appellant's director/principal shareholder and affiliated companies use (and have been using) the contested domain name for all their activities and are completely dependent on the contested domain name. The Appellant's business associates have been using an e-mail address linked to the contested domain to contact the Appellant for more than twenty years. Even if it were the case that the current registrant makes more intensive use of the contested domain name than the Appellant, it does not follow that reversal of the registrant change would be socially unacceptable. According to the Appellant, SIDN has provided no evidence to support the claim of social unacceptability.
- 2.7 The Appellant accordingly argues that the possibility of the current registrant experiencing inconvenience as a result of no longer being recognised as registrant of the contested domain name does not constitute grounds for deeming reversal of the change to be

"socially unacceptable", even if the current registrant should reasonably be regarded as the registrant of the domain.

- 2.8 In the supplementary appeal document, the Appellant makes the arguments summarised below.
- 2.9 The circumstances of the case do not qualify as exceptional, in the sense of Article 28 of the Terms and Conditions. SIDN has been unduly influenced by the current registrant's account of the situation. It is apparent from SIDN's response document that the contested decision is based on a flawed assessment framework. SIDN is not entitled to rely on Article 28 of the Terms and Conditions to arbitrarily subordinate the primary rules to its own comparative assessment of the respective interests of the parties contesting control of the domain name. SIDN's response clearly departs from the original argument that the trading name had been legitimately purchased by the current registrant.
- 2.10 With regard to SIDN's assertion that the Appellant did not object when the registrant change was made in 2017, and the further assertion made in SIDN's response that the Appellant had been notified of the registrant change, the Appellant argues that SIDN has drawn an unjustified conclusion from an e-mail of September 2017. According to the Appellant, it was not apparent that the e-mail in question was sent for the reason of notifying the Appellant of a change to the registrant of the contested domain name. Hence, the Appellant was completely unaware of the registrant change. According to the Appellant, there was no reason to suppose that a registrant change had been made. In support of that assertion, the Appellant points out that the Appellant made unfettered use of the domain name until the end of 2020.
- 2.11 Moreover, according to the Appellant, the current registrant made virtually no use of the domain name in the period 2017 to 2020. In support of that assertion, the Appellant draws attention to the website linked to the contested domain name. The website in question, the Appellant argues, has no functionality and is nothing more than an electronic name board. By contrast, the Appellant has been using the contested domain name since 2017 to communicate with various business associates regarding investments in realty and investment funds. Until December 2020, all such communications made use of the contested domain name. Since then, the Appellant has been obliged to rely on e-mail addresses at other domains, which has caused problems. It is accordingly argued that the Appellant's interest in the contested domain name is just as substantial as that of the current registrant.

SIDN's case

- 3.1 In response, SIDN petitions the C&AB to dismiss the appeal.
- 3.2 In support of that petition, SIDN makes the arguments summarised below.
- 3.3 The contested decision states that, on 26 March 2021, SIDN received the Appellant's request to reverse the change to the registrant of the contested domain name. The basis for the Appellant's request was that the change was made without the consent of the Appellant as former registrant. In response, SIDN conducted an investigation to establish

whether the change was made in accordance with the applicable rules. As part of that investigation, documentation was requested from the registrar that had arranged the registrant change, in order to establish whether the Appellant's consent was given. SIDN observed that it was not possible to determine from the documentation that the registrant change was made on the Appellant's behalf.

3.4 Hence, SIDN concluded that the registrant change was not made in accordance with the correct procedure. However, when considering whether the registrant change should therefore be reversed, SIDN additionally took account of "particular circumstances that meant that the implications of reversing the registrant change, as provided for in the applicable rules, would have socially unacceptable consequences". SIDN accordingly took the view that the Appellant had no substantial interest (any longer) in being recorded as the registrant of the contested domain name and based the contested decision on that view. In arriving at that decision, SIDN took account of the following:

- (i) The contested domain name corresponds to the trading name of the current registrant, who acquired the trading name 'Albers Mijdrecht Assurantiën' and other rights from the Appellant under the terms of a purchase contract concluded between the two in September 2016.
- (ii) The registrant change took place in 2017 and no objection to it was made at the time.
- (iii) The current registrant made a substantiated claim to have been using the contested domain name since 2017.

3.5 In its response document, SIDN makes the arguments summarised below.

3.6 The contested domain name was registered to the Appellant, though the registrar KPN Telecom B.V., from 1999 to 31 August 2017. On 31 August 2017, the contested domain name was transferred to the registrar TransIP B.V. using a valid token, after which a registrant change was made, transferring the registration to the name of the current registrant.

3.7 In the context of the investigation referred to in 3.3, SIDN contacted the registrar TransIP B.V. by e-mail on 2 April 2021, asking for evidence that the registrant change was made on the instructions of the Appellant. In response, TransIP B.V. provided SIDN with a copy of an e-mail from the Appellant to the current registrant, dated 1 September 2017. The e-mail's contents included the text of an automated message sent by SIDN's Domain Registration System on 31 August 2017, the subject of which was "Name of registrant of albersmijdrecht.nl has been changed". The message went on to say that TransIP BV had changed the registrant of albersmijdrecht.nl.

3.8 On 7 April 2021, SIDN received an e-mail from the current registrant explaining the circumstances of the registrant change. In the e-mail, the current registrant stated that, under a purchase contract dated September 2016, the current registrant had acquired the right to use the trading name. The contested domain name's registration was accordingly transferred to the current registrant in August 2017, at the Appellant's request. From the e-

mail (a copy of which was appended to SIDN's response), it is also apparent that the current registrant no longer has copies of the documents in which the Appellant requested transfer of the contested domain name. The only evidence of such a request that the current registrant could provide was the Appellant's e-mail of 1 September 2017, namely the e-mail that TransIP B.V. provided to SIDN.

- 3.9 In the aforementioned e-mail to SIDN, the current registrant claimed to have a substantial interest in retaining the registration of the contested domain name. According to the current registrant, the contested domain name is used in the running of an insurance brokerage: numerous policy holders, insurance companies and suppliers use addresses at the contested domain.
- 3.10 SIDN stated that its regulations on and procedures for the registration of .nl domain names are based on the principle that SIDN should not be put in the position of needing to decide who has the right to a domain name. Hence, when considering requests pertaining to the registration of domain names and the subsequent processing of register amendments, SIDN does not consider who has the right to a domain name. SIDN considers only whether the rules and procedures applicable to its contractual relations with registrants and registrars have been adhered to.
- 3.11 SIDN takes the view that, in light of the evidence that the Appellant did not consent to the registrant change, the registrar should in principle have reversed the change. However, in exceptional circumstances, SIDN is entitled to depart from the Terms and Conditions or the defined procedures and to decide not to reverse an irregular register amendment on the basis of a "comparative assessment of marginal interests". SIDN is entitled to do so under the terms of Article 28 of the Terms and Conditions. SIDN contends that such circumstances exist in this case. The circumstances of the case led SIDN to arrive at the contested decision, namely to depart from the procedure and not to reverse the irregular register amendment.
- 3.12 SIDN also states that, following receipt of the appeal, an administrative error occurred, which led to a draft version of the contested decision being sent to the Appellant rather than the finalised version. The draft version of the contested decision includes certain phraseology that SIDN does not stand by. However, SIDN does stand by the essential import of the contested decision. According to SIDN, the contested decision's reference to "socially unacceptable" consequences mis-describes the comparative assessment of marginal interests made by SIDN in practice. As part of these appeal proceedings, SIDN provided a copy of the finalised version of the contested decision, which should have been sent in place of the draft version.
- 3.13 SIDN states that the comparative assessment of marginal interests was carried out because of the very great practical importance of being recorded as the registrant of a domain name. That importance relates to the fact that it is the registrant to whom SIDN has a contractual service obligation, and who has the exclusive right to make use of a domain name.
- 3.14 On the basis of the information available to it concerning the domain name albersmijdrecht.nl, SIDN concluded that the potential adverse consequences for the

current registrant of reversing the registrant change were "disproportionate to" (which the C&AB interprets as: "outweigh") the Appellant's interest in being recorded as the registrant of the contested domain name. That conclusion was based principally on the three considerations set out in the contested decision and summarised in 3.4 (i) to (iii), above.

- 3.15 In its supplementary response document, SIDN makes the arguments summarised below. SIDN asserts that the Appellant is accountable and liable for the Appellant's misinterpretation of SIDN's e-mail of 1 September 2017 and consequent failure to object to the registrant change. From the Appellant's assertion that, for the last several years, the contested domain name has been used by both the Appellant and the current registrant, SIDN assumes that the two parties chose to use the same domain name and thus accepted the risk associated with mutual dependency. It appears that a disagreement later arose, in consequence of which the Appellant lost the ability to use the contested domain name.

Consideration

- 4.1 The C&AB received the appeal document in good time. Moreover, the appeal fee referred to in Article 4.4 of the Complaints and Appeals Regulations was duly paid.
- 4.2 In accordance with Article 3.7 of the Complaints and Appeals Regulations, the C&AB has accordingly considered whether the contested decision was within the bounds of the law and the applicable rules defined by SIDN (the Terms and Conditions and the published procedures), and whether, taking all circumstances into account, it was reasonable for SIDN to arrive at the decision it made.
- 4.3 In the context of these appeal proceedings, the C&AB has based its opinions on the version of the contested decision presented by SIDN in its e-mail of 15 June 2021, as referred to in 1.1. Notwithstanding that SIDN had apparently intended the decision to be formulated otherwise, the decision was in fact formulated and communicated to the Appellant as stated in the above-mentioned e-mail, and it is against the decision thus formulated that the Appellant has appealed. Nevertheless, the C&AB has taken account of the intended formulation and SIDN's associated explanations, and has treated them as part of SIDN's argument for upholding the contested decision.
- 4.4 The starting point for the C&AB's consideration is SIDN's conclusion that the change to the registrant of the contested domain name on 31 August 2017 was irregular, insofar as, according to SIDN's own investigation, no evidence could be found that the change was made on the Appellant's behalf.
- 4.5 The C&AB therefore considers that, in principle, SIDN should have fulfilled the Appellant's request to annul the registrant change, in accordance with the provisions of Article 13.1 (introduction and subparagraph ii) of the Terms and Conditions. The said provisions allow SIDN, in response to a request from a third party, to annul a register amendment if SIDN is satisfied that the amendment was requested by someone who did not at that time have the authority to act on behalf of the registrant. Although the relevant provisions state that SIDN 'can' annul a register amendment, a reasonable interpretation of Article 13.1 in the context of the Terms and Conditions and of SIDN's role as the exclusive administrator of .nl domain names implies that – at least in the circumstances referred to in subparagraph

ii of that article – SIDN must annul a register amendment, except under the circumstances referred to in Article 28 of the Terms and Conditions. From the arguments presented in the context of this appeal, the C&AB concludes that SIDN's interpretation of Article 13.1(ii) is consistent with the C&AB's interpretation.

4.6 Article 28 of the Terms and Conditions reads as follows:

We are entitled to (i) apply additional rules and decide matters in circumstances not foreseen by these General Terms and Conditions, and (ii) depart from these General Terms and Conditions (or the associated procedures) under exceptional circumstances, if we consider such action to be reasonable under the circumstances in question (because, for example, the action is necessary to enable us to discharge our responsibilities properly or to enable the domain name system to function properly).

4.7 No party to this case has suggested, and the facts of the case do not suggest, that Article 28(i) (circumstances not foreseen by the Terms and Conditions) applies in this case. The contested decision is therefore defensible only if SIDN, having considered the Appellant's request, could reasonably conclude that exceptional circumstances of the kind referred to in Article 28(ii) existed.

4.8 The C&AB starts from the observation that the nature and wording of Article 28 of the Terms and Conditions imply that the article is intended to cover exceptional situations and should be applied with caution, where solid grounds for application exist. The fact that SIDN operates on the basis of detailed rules governing the assignment and administration of .nl domain names (obtainable exclusively via SIDN), which rules (at least those provided for in the Terms and Conditions) are integral to the contract between SIDN and every registrant, implies that any party that has rights as a registrant or former registrant is entitled to assume that SIDN will depart from those rules only in exceptional cases, which SIDN can present clear and compelling reasons for regarding as exceptional in the sense of Article 28.

4.9 Article 28 does not contain an explicit definition of the exceptional circumstances to which it applies, but does contain two examples, namely circumstances where departure from the rules is necessary to enable SIDN to discharge its responsibilities properly and circumstances where departure is necessary to enable the domain name system to function properly. Those examples indicate that Article 28 is intended to apply to exceptional circumstances where fulfilment of SIDN's normal rules (by or against a particular party) would inevitably be contrary to the (wider) interest of the proper functioning of the domain name system or of SIDN as a registry. The existence of such exceptional circumstances was not stated by SIDN as the basis of the contested decision, nor has SIDN asserted the existence of such circumstances in the context of these proceedings, nor is the existence of such circumstances apparent to the C&AB from the facts of the case.

4.10 As indicated, the provisions of Article 28 do not preclude its application in other exceptional circumstances. However, in view of the considerations set out above, the C&AB's opinion is that it is not readily plausible that, in isolation, a comparative assessment of the 'marginal' or other interests of two individual parties in dispute over a domain name might support the conclusion that exceptional circumstances exist, which would reasonably justify SIDN

departing from the rules that regulate the rights of those parties. Indeed, that opinion is consistent with SIDN's own interpretation of its role, as described in the context of these proceedings, namely that the rules and procedures governing domain names are based on the principle that SIDN does not decide who has the right to a domain name, but confines itself to application of the rules and procedures governing its contractual relations with registrants and registrars.

- 4.11 From the foregoing, it follows that, insofar as the contested decision was based on (the outcome of) a comparative assessment of the respective interests of the current registrant of the contested domain name and the Appellant, it was not reasonable for SIDN to rely on Article 28 of the Terms and Conditions. Notwithstanding the Appellant's presentation of reasoned grounds for disputing some of the current registrant's assertions regarding the trading name Albers Mijdrecht Assurantiën, regarding the acquisition of the right to use that name in September 2016 under the terms of a sale contract, and regarding (the extent of) the use of the contested domain name subsequently made by the Appellant and the current registrant, those assertions do not imply the existence of exceptional circumstances, as referred to in Article 28 of the Terms and Conditions, justifying departure from the rules governing (the annulment of) registrant changes.
- 4.12 The contested decision was additionally based on the consideration that "the registrant change took place in 2017 and no objection to it was made at the time". The C&AB observes that neither the Terms and Conditions nor any of SIDN's other procedures or rules place a time limit on the right to request the reversal of a register amendment. Insofar as SIDN's reasoning must be understood to imply that, by 2021, the Appellant had forfeited the right to request the reversal of an irregular registrant change made in 2017, the C&AB takes the following into consideration.
- 4.13 General contract law does not exclude the possibility that a right arising out of a domain name registration contract with SIDN may be legally forfeited. That may be the case if exercise of the right is unacceptable by prevailing standards of reasonableness and fairness. However, Supreme Court jurisprudence implies that a cautious approach must be taken to such curtailment of contractual rights. Neither the mere passage of time nor mere inaction are sufficient to assume the legal forfeit of a contractual right. The assumption of legal forfeit requires either that the creditor (in this case, the Appellant) has given the counterparty (in this case, SIDN) reasonable grounds to believe that the right in question will no longer be exercised, or that exercise of the right by the creditor would unreasonably disadvantage the counterparty.
- 4.14 The C&AB is of the opinion that it does not appear that the Appellant gave SIDN reasonable cause to believe that the Appellant had conceded the right to request the reversal of an irregular registrant change. The mere fact that the Appellant failed to respond to SIDN's e-mail of 31 August 2017, in which SIDN informed the Appellant of the registrant change arranged by the registrar, does not constitute reasonable cause for such a belief. That failure merely constitutes inaction. Furthermore, the e-mail advises the Appellant to contact TransIP BV, not SIDN, if anything is amiss. Therefore, if the Appellant had understood that something was not in order and had wished to object, that objection would, in compliance with SIDN's advice, have been made to TransIP. The Appellant cannot be blamed for not objecting to the change until 2021. In this case, it is of particular significance that, as the

Appellant attests, the Appellant continued to make unfettered use of the contested domain name after August 2017 for purposes such as e-mail correspondence with clients, meaning that there was no practical cause to suppose that another party had become registrant of the contested domain name until early 2021, when the current registrant prevented the Appellant's continued use of the contested domain name for e-mail purposes. As SIDN considers that the current registrant had also been making use of the contested domain name since 2017, that implies that, until early 2021, both the Appellant and the current registrant, apparently on the basis of tacit or other agreement, or at least the (tacit) consent of the current registrant, made use of the contested domain name and the associated e-mail addresses.

- 4.15 SIDN's confirmation that a valid transfer token was used for the transfer of the contested domain name to the current registrar TransIP does not alter that implication. First, as SIDN itself explains, a transfer token is required only for the transfer of a domain name from one registrar to another, not for a registrant change. Second, SIDN has not advanced (adequate) grounds for assuming that the Appellant made the transfer token available to the current registrant. The circumstances of the case do not provide SIDN with reasonable grounds for supposing that the Appellant had accepted an irregular registrant change.
- 4.16 Moreover, the C&AB is not of the opinion that SIDN was unreasonably disadvantaged in its relations with the current registrant or otherwise by the fact that the Appellant did not request reversal of the registrant change until 2021. In reaching its opinion on that matter, the C&AB has referred to the evidence presented by SIDN in the context of these proceedings. SIDN has not asserted that it is disadvantaged by the delayed submission of a reversal request. With regard to SIDN's relationship with the current registrant, the primary consideration in these proceedings is that, in the context of that relationship, it must be assumed that the contested domain name's registration was amended in an irregular manner and that, in principle, SIDN is therefore entitled to annul the amendment. SIDN's assertion that the current registrant has been using the contested domain name for several years does not support an alternative conclusion. The C&AB observes that, with regard to use of the contested domain name, SIDN itself argues (see 3.15) that it seems that both the Appellant and the current registrant chose to use the same domain name and thus accepted the risk associated with mutual dependency.
- 4.17 A further significant consideration in that context is that SIDN's role in the requested registrant change – and therefore the outcome of these appeal proceedings – is limited to application of the existing rules and procedures governing the assignment and administration of domain names; SIDN's actions are not legally relevant to the question of who (the Appellant or the current registrant) has the right to the contested domain name under the terms of the contractual relationship between those parties.
- 4.18 The C&AB is therefore of the opinion that the contested decision could not reasonably be based on the consideration that the registrant change took place in 2017 and that no objection to it was made at that time.
- 4.19 The foregoing leads to the conclusion that the Appellant's appeal must be upheld. As provided for in Article 7 of the Complaints and Appeals Regulations, the C&AB accordingly upholds the appeal and understands that SIDN shall reverse the register amendment in

accordance with the provisions of Article 7.4 (introduction and subparagraph b.) of the Complaints and Appeals Regulations. In accordance with the provisions of Article 13.2 of the Terms and Conditions, SIDN must therefore immediately notify the current registrant and the Appellant of the C&AB's decision and freeze the contested domain name until thirty days after notice is given.

- 4.20 The C&AB additionally draws the following considerations to the Appellant's attention. As explained above, the outcome of these proceedings has no legal bearing on the question of whether the Appellant or the current registrant ultimately has the right to the contested domain name. If necessary, that question must be decided by proceedings under the Dispute Resolution Regulations for .nl Domain Names and/or by a civil court. If the Appellant and the current registrant reached an agreement in 2016 and there was "peaceful coexistence" between them for several years thereafter (until early 2021), the C&AB considers it advisable to explore the scope for an amicable solution that would spare both parties the time and expense of Dispute Resolution proceedings and/or civil court proceedings. The C&AB accordingly asks SIDN, when notifying the current registrant of this ruling, to consider also informing the current registrant of the supporting considerations.

Decision

The Complaints and Appeals Board of the Foundation for Internet Domain Registration in the Netherlands

- upholds the appeal of Albers Mijdrecht Assurantiën B.V.;
- understands that, in accordance with Article 7.4(b) of the Complaints and Appeals Regulations, SIDN shall annul the change made to the registrant of the contested domain name albersmijdrecht.nl on 31 August 2017.

This ruling was made on 18 February 2022 by C&AB Chair Meester H Struik and C&AB members Professor Meester PH Blok, Meester SM Huydecoper and Meester TJM de Weerd, in the presence of C&AB Secretary Meester HJM Gardeniers.

Signed

H Struik

Signed

HJM Gardeniers