

IN THE EQUALITY COURT AT THE MAGISTRATE'S COURT
HELD AT LOUIS TRICHARDT

Case number: 01/2020

In the application of:

MEDIA MONITORING AFRICA TRUST

Applicant for admission
as an amicus curiae

In the matter between:

**MAVHIDULA, AZWIDINI VICTOR (ON BEHALF OF
THE SOUTH AFRICAN HUMAN RIGHTS COMMISSION)**

Complainant

and

MATUMBA, ANTHONY

Respondent

**NOTICE OF MOTION:
APPLICATION FOR ADMISSION AS AN AMICUS CURIAE**

KINDLY TAKE NOTICE THAT the applicant for admission as an amicus curiae applies to this Court for an order in the following terms:

1. Admitting Media Monitoring Africa as an amicus curiae;

2. Granting Media Monitoring Africa —

2.1. the opportunity to file written submissions; and

2.2. the opportunity to present oral argument at the hearing of the appeal,

provided that such argument does not repeat matters set forth in the arguments of the parties;

3. Costs against any party that opposes this application;

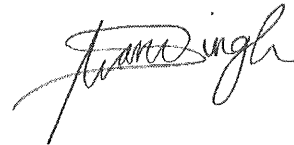
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4. Further and/or alternative relief.

TAKE FURTHER NOTICE that the affidavit of **WILLIAM ROBERT BIRD** and the annexures thereto will be used in support of this application.

TAKE FURTHER NOTICE that the applicant for admission as an amicus curiae has appointed the address of its correspondent attorneys, **COXWELL STEYN VISE & NAUDE INC.**, at 31 Songowezi Street, Louis Trichardt, 0920, as the address at which it will accept notice and service of all process in these proceedings. Electronic service will also be accepted at avani@powersingh.africa.

DATED AT JOHANNESBURG ON THIS 20TH DAY OF JULY 2021



POWER SINGH INC.

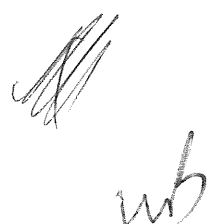
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**TO: THE CLERK OF THE
ABOVE HONOURABLE COURT**



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and

MATUMBA, ANTHONY

Respondent

FOUNDING AFFIDAVIT

I, the undersigned,

WILLIAM ROBERT BIRD

hereby make oath and state:

1. I am an adult male, and the Director of Media Monitoring Africa ("MMA"), a not-for-profit organisation with registered offices at Suite No. 2, Art Centre, 22 6th Street, Parkhurst, Johannesburg.
2. I am duly authorised to bring this application and to depose to this affidavit on behalf of the MMA Trust.


mb

3. The facts to which I depose are true and correct and are within my personal knowledge, except where it is apparent from the context that they are not. Where I make submissions of law, I do so on the advice of MMA's legal representatives.
4. This is an application in terms of regulation 10(5)(c)(iv) of the Regulations Relating to the Promotion of Equality and Prevention of Unfair Discrimination Act, 2000 ("the Regulations"), in terms of which MMA seeks leave to be admitted as an *amicus curiae* in this matter.
5. In line with MMA's particular areas of interest and expertise, and fully cognisant of the duty of an amicus not to repeat any of the submissions that have already been canvassed by the parties, MMA's proposed submissions are narrowly tailored to three key issues of relevance to the present matter:
 - 5.1. **First**, the appropriate balance to be struck between the right to freedom of expression, on the one hand, and other competing rights and interests (such as the rights to dignity and reputation), on the other, with a specific focus on the particular context of speech on social media platforms.
 - 5.2. **Second**, the nature of harassment online, given the speed with which it spreads and the amplification of the audience, and how the effects of such harassment may be exacerbated in circumstances where this is coupled with the dissemination of false information (i.e. mis- and/or disinformation).
 - 5.3. **Third**, the appropriate remedy in such proceedings, including the elements of a swift and effective remedy, the factors to be taken into account in respect of online publications, and the importance of an apology as a remedy.
6. In this affidavit, I begin by dealing with the interest that MMA has in this matter, followed by a brief overview of the submissions that MMA seeks to advance.

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7. Prior to filing this application, MMA wrote a letter to the parties requesting consent for MMA to be admitted as an *amicus curiae* in this matter. This letter is attached hereto marked “**WRB1**”.

7.1. On 16 July 2021, the complainant provided MMA with consent to its request to be admitted as an *amicus curiae*. This letter is attached hereto marked “**WRB2**”.

7.2. No response has been received from the respondent. If one is provided, this will be placed before this Court via a supplementary affidavit.



MMA’S INTEREST IN THE PROCEEDINGS

8. MMA is a not-for-profit organisation that operates in the public interest to promote the development of a free, fair, ethical and critical media culture in South Africa and the rest of the continent. To avoid unduly burdening these papers, I have not attached the MMA Trust Deed, but it can be provided should the need arise.
9. In the last 28 years, MMA’s work has consistently related to key human rights issues, always with the objective of promoting democracy, human rights, and encouraging a just and fair society. MMA has and continues to play an active role in media monitoring and seeks to proactively engage with media, civil society organisations, state institutions and citizens, and in doing so advocates for freedom of expression and the responsible free flow of information to the public on matters of public interest.
10. MMA has a keen interest in navigating the appropriate balance to be struck between freedom of expression and other competing rights and interests, as is evidenced by its involvement in a range of policy, legislative and advocacy processes. Notably, MMA has made a variety of submissions that relate to the triad of information rights which include the rights to privacy, freedom of expression and access to information. These include submissions to:

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- 10.1. The Department of Justice and Constitutional Development the draft bill on the Prevention and Combatting of Hate Crimes and Hate Speech Bill;
 - 10.2. The Information Regulator on the Draft Regulations of the Personal Information Act 4 of 2013;
 - 10.3. The Select Committee on Security and Justice of the National Council of Provinces on the Cyber Crimes Bill;
 - 10.4. The Portfolio Committee on Justice and Correctional Services on the Promotion of Access to Information Amendment Draft Bill;
 - 10.5. The Competition Commission on the Data Services Market Inquiry;
 - 10.6. ARTICLE 19 on the consultation paper regarding Social Media Councils; and
 - 10.7. The Independent Communication Authority of South on the Discussion Document on the Market Inquiry into Mobile Broadband Services in South Africa.
11. Further to this, MMA has participated in numerous matters as a party or an amicus curiae, including the following:
- 11.1. As an applicant before the Constitutional Court in *Centre for Child Law v Media 24 Limited*,¹ in which the best interest of the child and their rights to equality, privacy and dignity were balanced against freedom of expression and the principle of open justice;

¹ [2019] ZACC 46.

- 11.2. As an amicus curiae before the Supreme Court of Appeal in *Van Breda v Media 24; National Director of Public Prosecutions v Media 24 Limited and Others*,² where it advanced arguments the regarding appropriate circumstances under which the right to freedom of expression can be limited, particularly when it is necessary to protect the rights of vulnerable persons, especially children;
- 11.3. As an amicus curiae before the Constitutional Court in *South African Human Rights Commission on behalf of South African Jewish Board of Deputies v Masuku*,³ where it considered section 16 of the Constitution, and the interplay with the right to offend, shock and disturb, taking into account South Africa's repressive history of speech regulation; and
- 11.4. As an amicus curiae before the Constitutional Court in *Amabhungane Centre for Investigative Journalism NPC and Another v Minister of Justice and Correctional Services and Others*,⁴ where it advanced arguments for the protection of children and civil society actors in the context of South Africa's current surveillance regime which unjustifiably infringes on the right to privacy and associated constitutional rights, including freedom of expression.
- 11.5. As an amicus curiae before the Supreme Court of Appeal in *Economic Freedom Fighters and Others v Manuel*,⁵ where it advanced submissions on the unique content created by social media platforms, with a particular focus on the harmful nature of disinformation distributed via such platforms.
12. In addition to this, I have spoken on numerous occasions about issues pertaining to the exercise of freedom of expression online and the appropriate limits that are applicable thereto. This has included, for instance, participating in an expert group on disinformation hosted by the University of Essex along with academics, civil society and

² [2017] ZASCA 97.

³ Case No. CCT 14/19.

⁴ [2021] ZACC 3.

⁵ [2020] ZASCA 172.

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United Nations (UN) bodies, as well as speaking at a workshop hosted by the Independent Electoral Commission and the UN Development Programme on combatting online harms during election periods in Africa.

13. The present matter raises important questions related to new media platforms, in particular social media platforms, and the tension between freedom of information and harassing content. Social media platforms facilitate the exchange of information and ideas from diverse sources and create space for people to exercise their right to freedom of expression. However, with these new platforms, new challenges have arisen in terms of the spreading of wrongful and harmful publications. As a result of these challenges, there is a need for courts to grant appropriate, effective and expeditious remedies for persons who have been harmed online and in the broader public interest.
14. MMA respectfully submits that it well-placed to provide this Court with assistance regarding the legal issues that arise in this regard in the context of the present appeal.
15. Moreover, given MMA's established track record of acting in the public interest in matters relating to the advancement of the constitutional right to freedom of expression and competing rights and interests, MMA respectfully submits that it would be of assistance to the Court for it to be provided with legal submissions that do not emanate from only the parties to this dispute.

SUBMISSIONS TO BE ADVANCED BY MMA

16. If admitted as an amicus curiae, MMA seeks to focus on three discrete issues, which MMA respectfully submits will be of use to the Court in its adjudication of this matter. MMA's submissions in this regard are briefly summarised below, and will be expanded upon in the event that MMA is granted leave to file written submissions and present oral argument at the hearing of this matter.



Appropriate balance to be struck between the right to freedom of expression and other competing rights and interests

17. The right to freedom of expression is a crucial right, both in itself and as an enabler of a range of other rights. Provided for in section 16 of the Constitution of the Republic of South Africa, 1996 (“the Constitution”), it has been described by the Constitutional Court as “a *sine qua non* for every person’s right to realise his or her full potential as a human being”.⁶ In *South African National Defence Union v Minister of Defence and Another*, the Constitutional Court held:⁷

“Freedom of expression lies at the heart of a democracy. It is valuable for many reasons, including its instrumental function as a guarantor of democracy, its implicit recognition and protection of the moral agency of individuals in our society and its facilitation of the search for truth by individuals and society generally. The Constitution recognises that individuals in our society need to be able to hear, form and express opinions and views freely on a wide range of matters.”

18. According to Milo and Singh, the broad formulation contained in section 16(1) of the Constitution applies regardless of the medium through which the expression is conveyed; this includes the typical forms of communication, such as publishing and broadcasting, as well as newer forms, such as blogging and tweeting.⁸ The Constitutional Court has further accepted that the right to receive or impart information or ideas is applicable “not only to ‘information’ or ‘ideas’ that are favourably received or regarded as inoffensive or as a matter of indifference, but also to those that offend, shock or disturb”.⁹ According to the Constitutional Court, freedom of expression extends “even where those views are controversial. The corollary of the freedom of expression and its related rights is tolerance by society of different views. Tolerance, of course, does not require

⁶ *Case and Another v Minister of Safety and Security and Others; Curtis v Minister of Safety and Others* [1996] ZACC 7 at para 26.

⁷ [1999] ZACC 7 at para 7.

⁸ Milo and Singh “Freedom of expression” in Brickhill (ed.) *Public Interest Litigation in South Africa* (2018).

⁹ *De Reuck v Director of Public Prosecutions (Witwatersrand Local Division) and Others* [2003] ZACC 19 at para 49.



approbation of a particular view. In essence, it requires the acceptance of the public airing of disagreements and the refusal to silence unpopular views”.

19. The right to freedom of expression is, however, not absolute, and any limitation of the right requires a careful balance of competing rights and interests in accordance with section 36 of the Constitution. According to Milo and Singh, a three-part test can be distilled when assessing whether a limitation to the right to freedom of expression can pass constitutional muster:¹⁰

“Step 1: Is the expression excluded in terms of s 16(2) of the Constitution? If yes, that is the end of the enquiry. If not, then the expression is protected under s 16(1) and it is necessary to move on to the next step.

Step 2: Is there a common law rule or statutory provision that limits the protection of freedom of expression? If yes, then it is necessary to move on to the next step. If not, that is the end of the enquiry.

Step 3: Is the limitation of freedom of expression reasonable and justifiable, as contemplated under the general limitations clause in s 36 of the Constitution? If yes, the law permissibly limits freedom of expression. If not, then the law is an impermissible limitation of freedom of expression.”

20. In determining whether the impugned tweets constitute harassment in terms of the Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000 (“PEPUDA”), this Court will necessarily be called upon to determine the appropriate balance to be struck between the respondent’s right to freedom of expression, weighed against the broader public interest in the protection from harassment online. In doing so, the Court will also be asked to grapple with the unique context presented by social media platforms in the dissemination of content online.

¹⁰ Milo and Singh, above n 8.



21. Accordingly, MMA seeks to assist the Court by making submissions on the limitations analysis that will need to be conducted in line with sections 16 and 36 of the Constitution, when read together with PEPUDA.

Nature of harassment online

22. The prohibition against harassment contained in PEPUDA is technology-neutral, in that it applies equally whether such harassment is committed on- or offline. However, the reality is that, in the digital era, harassment online raises nuanced and complex considerations when regard is had to the speed with which the content is spread and the amplified audience to which it is addressed. MMA accordingly seeks to make submissions on these unique considerations in determining the impact that the impugned tweets had on the public discourse and in the public interest.
23. A further consideration that arises is in respect of who constitutes the so-called reasonable reader on a social media platform. MMA submits that this is a critical question, and will rely on comparative law from other jurisdictions to assist the Court in answering this question. For instance, in the United Kingdom judgment of *Stocker v Stocker*, it was held that:¹¹

“The advent of the 21st century has brought with it a new class of reader: the social media user. The judge tasked with deciding how a Facebook post or a tweet on Twitter would be interpreted by a social media user must keep in mind the way in which such postings and tweets are made and read.”

24. The court in that matter relied on *Monroe v Hopkins*, which provided guidance on engaging with Twitter posts, wherein the Court noted:¹²

“The most significant lessons to be drawn from the authorities as applied to a case of this kind seem to be the rather obvious ones, that this is a conversational medium; so it would be wrong to engage in elaborate analysis of a 140

¹¹ [2019] UKSC 17 at para 41.

¹² [2017] EWHC 433 (QB).

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character tweet; that an impressionistic approach is much more fitting and appropriate to the medium; but that this impressionistic approach must take account of the whole tweet and the context in which the ordinary reasonable reader would read that tweet. That context includes (a) matters of ordinary general knowledge; and (b) matters that were put before that reader via Twitter.”

25. The Supreme Court in *Stocker v Stocker* endorsed this and held:¹³

“The imperative is to ascertain how a typical (i.e. an ordinary reasonable) reader would interpret the message. That search should reflect the circumstance that this is a casual medium; it is in the nature of conversation rather than carefully chosen expression; and that it is pre-eminently one in which the reader reads and passes on.”

26. There are varying considerations regarding how courts, in the context of online harassment, should understand the reasonable reader. MMA submits that there are three considerations that could inform this understanding: (i) the actual platform as well as the community of users of the platform; (ii) the users who “follow” the original publisher of the potentially harassing statement; and (iii) shared interests with the person responsible for the initial publication.
27. A further argument that MMA seeks to advance is that harassment is exacerbated when coupled with false information, namely mis- and/or disinformation. In the present matter, such false information also impacts the reputation, dignity, credibility and integrity of the persons at whom the tweets were directed in a manner that undermines the exercise of the right to freedom of expression. Through the creation of a false identity, coupled with the falsehoods contained in the impugned tweets, the respondent appears to have manufactured a discourse that was both harmful and impermissible when read in the relevant context.

¹³ *Stocker v Stocker* above n 11 at para 43.

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Appropriate remedy

28. It is well-established in our law that litigants are entitled to a swift and effective remedy where they have successfully proven their claim. This is all the more applicable when dealing with publications online, given the speed with which the publication may be spread and the amplification of the audience. MMA is therefore of the view that courts need to adopt a robust and creative approach towards online harms and, in particular, must ensure that appropriate, effective and expeditious remedies are available in relation to harassment online.
29. In the context of the need for a swift and effective remedy, MMA will seek to draw on international and comparative law to expound the argument that, in the context of harassment online, particularly where there is the reasonable likelihood of this being harmful in nature and coupled with mis- and/or disinformation, a multi-pronged remedy can often be appropriate and necessary. Furthermore, MMA will seek advance arguments on the relevant consideration that the Court should take into account when determining when such an order would be appropriate, and further the measures to be considered in ensuring that any such order is both practicable and effective when dealing with content published on social media platforms.
30. With regard to the importance of an apology, regard will be had to the weight that our courts have placed on such a remedy. For instance, in *Dikoko v Mokhatla*, the Constitutional Court drew a link between the import of an apology and the idea of *ubuntu* or *botho*, stating that:¹⁴

“In our constitutional democracy the basic constitutional value of human dignity relates closely to *ubuntu* or *botho*, an idea based on deep respect for the humanity of another. Traditional law and culture have long considered one of the principal objectives of the law to be the restoration of harmonious human and social relationships where they have been ruptured by an infraction of community norms. It should be a goal of our law to emphasise, in cases of

¹⁴ [2006] ZACC 10 at paras 68-69.

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compensation for defamation, the re-establishment of harmony in the relationship between the parties, rather than to enlarge the hole in the defendant's pocket, something more likely to increase acrimony, push the parties apart and even cause the defendant financial ruin. The primary purpose of a compensatory measure, after all, is to restore the dignity of a plaintiff who has suffered the damage and not to punish a defendant. A remedy based on the idea of *ubuntu* or *botho* could go much further in restoring human dignity than an imposed monetary award in which the size of the victory is measured by the quantum ordered and the parties are further estranged rather than brought together by the legal process. It could indeed give better appreciation and sensitise a defendant as to the hurtful impact of his or her unlawful actions, similar to the emerging idea of restorative justice in our sentencing laws.

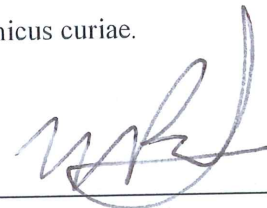
The focus on monetary compensation diverts attention from two considerations that should be basic to defamation law. The first is that the reparation sought is essentially for injury to one's honour, dignity and reputation, and not to one's pocket. The second is that courts should attempt, wherever feasible, to re-establish a dignified and respectful relationship between the parties. Because an apology serves to recognize the human dignity of the plaintiff, thus acknowledging, in the true sense of *ubuntu*, his or her inner humanity, the resultant harmony would serve the good of both the plaintiff and the defendant."

31. It is apparent from our case law that there is a myriad of factors to be taken into account when determining an appropriate remedy, which are all the more complicated when dealing with online harms. MMA seeks to assist this Court by drawing attention to these factors and making submissions on the weight to be attached to each in determining the appropriate remedy in the present matter.

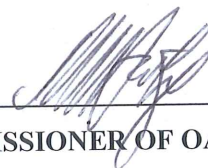


CONCLUSION

32. In the light of the submissions above, MMA requests that this Court grant MMA's application for intervention as an amicus curiae in the present matter. MMA respectfully submits that the arguments MMA that it intends to make are relevant to this matter and will be of assistance to this Court. Accordingly, MMA reserves the right to seek costs against any party that opposes MMA's admission as an amicus curiae.

**WILLIAM ROBERT BIRD**

I hereby certify that the deponent stated that he knows and understands the contents of this affidavit and that it is to the best of his knowledge both true and correct. This affidavit was signed and sworn to before me at Parkhurst on this the 20 day of July 2021. The Regulations contained in Government Notice R.1258 of 21 July 1972, as amended, have been complied with.

**COMMISSIONER OF OATHS**

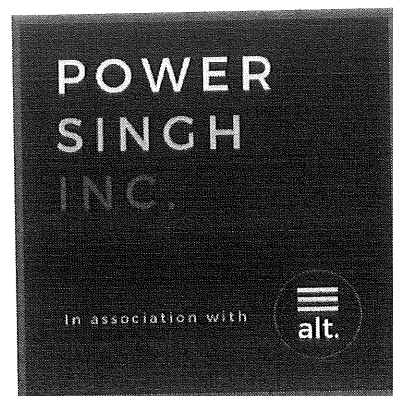
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// POWER SINGH INCORPORATED
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Date: 12 July 2021

Your ref: Case No. 01/2021

Our ref: PSIMM-201912

TO: AZWIDINI VICTOR MAVHIDULA
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c/o DDKK Attorneys
Attorneys for the complainant
By email: mdk@dkkk.co.za / tn@dkkk.co.za

ANTHONY MATUMBA
c/o Tshilidzi Makuya Attorneys
Attorneys for the respondent
By email: antenlegal2@gmail.com

Dear Sir / Madam,

MAVHIDULA (ON BEHALF OF THE SOUTH AFRICAN HUMAN RIGHTS COMMISSION) //
MATUMBA (CASE NO. 01/2021): REQUEST FOR CONSENT TO BE ADMITTED AS AN AMICUS
CURIAE

// Directors: A Singh B.Comm., LL.B. (UP), M] Power B.A., LL.B., LL.M. (Wits) | **Senior Associate:** T Power B.A., LL.B., LL.M. (Wits).
Associates: T Davis B.A. (RU), LL.B. (UCT), S Khumalo LL.B. (Wits) | **Office Manager:** J Rashid | **Technology Officer:** K Nwana.
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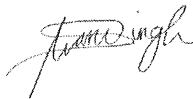
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1. We act for Media Monitoring Africa (“MMA” or “our client”), a not-for-profit organisation that operates in the public interest to promote the development of a free, fair, ethical and critical media culture in South Africa and the rest of the continent. In the last 28 years, MMA’s work has consistently related to key human rights issues, always with the objective of promoting human rights and democracy.
2. MMA has engaged in a range of legislative and advocacy processes relating to the triad of information rights, which include the rights to privacy, freedom of expression and access to information. This has included, for instance, on issues pertaining to data protection, online content regulation, cybercrimes, copyright, public broadcasting, and various other matters relevant to the exercise of these rights, both on- and offline.
3. MMA has further participated in various litigious proceedings pertaining to the right to freedom of expression, and the appropriate balance to be struck between freedom of expression and other competing rights and interests. This has included, for instance, participating as an applicant before the Constitutional Court in the matter of *Centre for Child Law and Others v Media 24 Limited and Others* [2019] ZACC 46, and as an amicus curiae before the Supreme Court of Appeal in *Van Breda v Media 24 Limited and Others; National Director of Public Prosecutions v Media 24 Limited and Others* [2017] ZASCA 97 and in *Economic Freedom Fighters and Others v Manuel* [2020] ZASCA 172.
4. In line with MMA’s particular areas of interest and the work that it pursues, MMA has a clear interest in the present matter, and wishes to participate as an amicus curiae as contemplated in regulation 10(5)(c)(vi) of the Regulations Relating to the Promotion of Equality and Prevention of Unfair Discrimination Act, 2000. Accordingly, we hereby request your client’s consent that our client be admitted as an amicus curiae with the opportunity to file an application and make written submissions, as well as to present oral argument, in this matter.
5. MMA does not intend to repeat any matter set forth in the argument of the other parties, and we emphasise that MMA seeks only to address issues that may be useful to the Court in the determination of this matter. In doing so, MMA intends to canvass the following issues, which it submits are relevant to the proceedings and different from those of the other parties to the litigation:
 - 5.1. **First**, MMA seeks to address the appropriate balance to be struck between the right to freedom of expression, on the one hand, and the rights to dignity and reputation, on the other, with a specific focus on the particular context of speech on social media platforms.
 - 5.2. **Second**, MMA seeks to address the nature of harassment online, given the speed with which it spreads and the amplification of the audience, and how the effects of such harassment may be exacerbated in circumstances where this is coupled with the dissemination of intentionally false information (i.e. mis- and/or disinformation).



- 5.3. **Third**, MMA seeks to address the appropriate remedy in such proceedings, including the elements of a swift and effective remedy, the factors to be taken into account in respect of online publications, the particular factors that arise when dealing with dignity and reputation, and the importance of an apology as a remedy.
6. Based on the foregoing, MMA submits that these issues are relevant to the Court in its full consideration of this matter. In making its submissions, MMA will draw on international and comparative law, and seek to offer assistance to the Court in assessing how to deal with the pressing – and global – challenges of balancing competing rights and interests online.
7. In order to enable MMA to properly prepare its application, we request that you advise, in writing, whether you consent to MMA's intervention as an amicus curiae **by no later than 16h00 on Wednesday, 14 July 2021**.
8. We look forward to hearing from you.
9. All our client's rights are reserved.

Yours faithfully,



POWER SINGH INC.

Per: Avani Singh | *Director*

E-mail: avani@powersingh.africa





DDKK

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Ons verw: / Our ref: M.C DE KLERK/TN/
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POWER SINGH INC

1ST Floor,
20 Baker Street,
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South Africa
2196

16 July 2021

By e-mail: avani@powersingh.africa

Dear Madam,

**MAVHIDULA (ON BEHALF OF THE SOUTH AFRICAN HUMAN RIGHTS
COMMISSION) // MATUMBA (CASE NO. 01/2021)**

1. We refer to the above matter and your letter dated 12 July 2021.
2. We act for and on behalf of the South African Human Rights Commission ("our client").
3. We confirm that our client has no objection to Media Monitoring Africa being admitted as amicus curiae in this matter.
4. All our client's rights remain reserved.

Yours faithfully


Thulani-Ngcobo
DDKK ATTORNEYS INC.

Member of the phatshoanehenney group of associated firms.
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firms, not practising in partnership and with separate liability

phatshoanehenney
ASSOCIATED LAW FIRMS

Directors/ Direkteure: Magdaleen de Klerk, Gert Ehlers, Monja Page
Non-executive director / Nie-uitvoerende direkteur: Matloane John Mophethe
Assisted by / Bygestaan deur: Thulani Ngcobo

Members of the Turnaround Association of South Africa and of
the South African Restructuring and Insolvency Practitioners Association

