

**FINDINGS OF THE SOUTH AFRICAN INSTITUTE FOR DRUG FREE SPORT ACT ("SAIDS") DISCIPLINARY HEARING HELD AT JOHANNESBURG ON THE 12<sup>th</sup> of APRIL and 1<sup>st</sup> of JULY 2012**

**Introduction**

1. An Anti Doping Disciplinary Committee ("the present panel" for clarity) comprising Michael Murphy, Yusuf Carrim, and Dr Sello Motaung, was appointed to consider certain anti doping charges leveled against Mr. Livingstone Jabanga, the chairman of Gauteng Striders Athletics Club and the panel sat on the 12<sup>th</sup> of April 2012 and the 1<sup>st</sup> of July 2012 because the matter could not be concluded at the first sitting.
2. Mr. Jabanga was charged with an anti doping rule violation in terms of Article 2.8 of the 2009 SAIDS Anti-Doping Rules ("the Code"). Put simply SAIDS alleged that Mr. Jabanga had *"provided pills/capsules to Lebogang Phalula before she competed in (a) race."*
3. SAIDS was represented in these proceedings by an advocate Mr. Kock and Mr. Jabanga by an attorney Mr. Rankooa. Both representatives were present on both days that the present panel sat and the present panel was satisfied that the parties were properly represented. The charge referred to was put to Mr. Jabanga and he pleaded not guilty. Mr. Rankooa furthermore explained and expanded upon the plea by stating that Mr. Jabanga had in fact not provided any pills to the athlete in question prior to the race in respect of which the matter arose.
4. The background referred to in the charge sheet served upon Mr. Jabanga and placed before the present panel recorded that *"Upon analysis of her urine sample collected at the completion of her race on the 27 August 2011, the South African Doping Control Laboratory at the University of Free State reported the presence of a prohibited substance in her urine sample. Furthermore the same substance identified in her urine sample was identified in the pills/capsules analysed that she had left from those that were given to her by you. The substance identified was the Stimulant, Methylhexaneamine. Methylhexaneamine is categorized under **Class 6, "Stimulants",** in specific **(b) Specified Stimulants** on the World Anti-Doping Code 2011 Prohibited List International Standard."*
5. Certain housekeeping, common cause, and background circumstances are worth recording for understanding including that-

- 5.1. Ms Phalula (referred to hereafter as Lebogang for reasons of clarity) is an athlete who competed for Striders – along with her twin sister – Lebo (who will be referred to as such) in a Spar Ladies 10km race on 27 August 2011;
- 5.2. It was after this race (“the Spar” hereafter) that Lebogang tested positive and was thereafter suspended, charged, and brought before an Anti Doping Disciplinary Committee (“the Phalula panel” for clarity);
- 5.3. In Lebogang’s hearing she did not dispute the presence of a banned substance in her body. Lebogang was found guilty and sanctioned although her sanction was reduced as the Phalula panel accepted, *inter alia*, her explanation that the pills had been provided by Mr. Jabanga and subsequent testing of remaining pills showed, assuming these were the pills that she had been given, that they would indeed have caused the positive test result in question;
- 5.4. In summary, and more particularity as was provided in an affidavit which she placed before the Phalula panel - which the present panel and the parties had before them in these proceedings – Lebogang contended that she had been unwell before the Spar and that Mr. Jabanga had provided her with certain pills to help her with her chest infection;
- 5.5. The acceptance, by the Phalula panel, of this explanation, meant that Lebogang had been able to establish how the substance had entered her body and together with other factors, including the nature of the substance – being a Specified Substance – this opened the door to a reduction in the sanction imposed upon her in accordance with Article 10.4 of the Code;
- 5.6. Consequent upon the nature of the proceedings before the Phalula panel and in particular the allegation by Lebogang that Mr. Jabanga had given her these pills, Mr. Jabanga was charged in these proceedings with transgressing Article 2.8 of the Code which is in the following terms-

***2.8 Administration or Attempted Administration to any Athlete***

*In-Competition of any Prohibited Method or Prohibited Substance, or administration or Attempted administration to any Athlete Out of Competition of any Prohibited Method or any Prohibited Substance that is prohibited in Out of Competition Testing, or assisting, encouraging, aiding, abetting,*

*covering up or any other type of complicity involving an anti-doping rule violation or any Attempted anti-doping rule violation.*

- 5.7. From the plea explanation provided by Mr. Rankooa, and as later emerged during the cross examination of the SAIDS witnesses the dispute between the parties was not a technical one focusing on the nature of the substance or the period in question, but rather, a very stark difference as to what happened on the day of the Spar;
  - 5.8. SAIDS, and Lebogang, on the one hand, repeated the version placed before the Phalula panel while Mr. Jabanga categorically denies almost everything that Lebogang had to say. Most importantly he says he did not give Lebogang any pills prior to the event and that her entire version of what took place that day is a lie. But more of the detail hereafter.
6. This has not been an easy matter for the present panel to deal with. There are two versions at utter variance one with the other and whichever version is accepted means that a number of individuals are intentionally misrepresenting what happened, and have together concocted a version which – sadly – has involved others who have supported the version in question. So, for example-
- 6.1. Lebogang's version of events was supported and endorsed by her twin sister, Lebo;
  - 6.2. Mr. Jabanga's version was supported by his wife, Mrs. Jabanga, and a young athlete who testified but was a minor and whose name and identity will not be recorded herein as a consequence.
7. Over the course of the two days the present panel heard evidence and submissions the following witnesses gave evidence-
- 7.1. Lebogang Phalula;
  - 7.2. Lebo Phalula;
  - 7.3. Mr. Jabanga;
  - 7.4. Mrs. Jabanga; and
  - 7.5. A minor athlete who will not be identified in this ruling but whose particulars SAIDS obviously has on record ("the minor").

**The proceedings on 12 April 2012**

8. At a procedural level when the hearing commenced Mr. Kock indicated that SAIDS had not been able to secure the physical attendance of the Phalula twins due to prior event commitments they had but that he had asked them to remain available so that they could be called and could testify telephonically.
9. The chairman enquired of Mr. Rankooa whether he had any objection to evidence being dealt with in this way and Mr. Rankooa said he had no objection as long as he was afforded the opportunity to cross examine the witnesses who so testified.
10. Each of the Phalula twins was then called, they identified themselves, were asked to speak separately and not in the presence each of the other and their evidence was led, and they were cross examined, by way of a telephone speaker system which enabled the present panel to hear them and for questions to be put to them.
11. It was during this process that the nature and extent of the difference – as between the versions of the Phalula twins, on the one hand, and Mr. Jabanga - became apparent.

Crisply stated SAIDS contend that Mr. Jabanga gave Lebogang pills to take prior to the Spar. Leaving aside certain matters of detail - which will be dealt with hereafter - SAIDS and the Phalula twins say that Mr. Jabanga collected the Phalula twins on the morning of the Spar and, with others; they travelled together to the Spar in Mr. Jabanga's motor vehicle. Mr. Jabanga then handed Lebogang the pills prior to the Spar commencing.

12. Mr. Jabanga says that this is a complete fabrication. Not only did he not hand Lebogang any pills he did not even travel with her, or Lebo, to the Spar. The Phalula twins were rather transported there and accommodated by the event organizers or sponsors while he, the minor athlete, and Mrs. Jabanga travelled separately in his motor vehicle.
13. These different versions emerged at the first sitting of the present panel during the cross examination of the Phalula twins by Mr. Rankooa. Mr. Rankooa, in the plea explanation, had said that his client had not given anything at all to Lebogang prior to any evidence being led but the true extent of the divergence only became apparent during cross examination when Mr. Rankooa put to each of the twins that they had not traveled to the Spar together with Mr. Jabanga at all.

14. Mr. Rankooa also pointed Lebogang to contradictions in her evidence and the nature and extent of these and the relevant matters emerging from cross examination will be dealt with below when the evidence as a whole is assessed.
15. Lebo then testified and her version was largely that of her sister. Again, the attack on Lebo's testimony, by Mr. Rankooa, and the issues which the present panel put to her, and to Lebogang, will be dealt with the assessment of the evidence hereafter.
16. After the evidence and cross examination of the Phalula twins and questions by the present panel it became apparent that the matter would not conclude that day and the hearing was postponed. The present panel requested, in view of the fact that the matter would not finish, that SAIDS endeavor to procure the attendance of the Phalula twins at the reconvened hearing insofar as the present panel were of the view that it would be far better to actually see the witnesses than rely only on their voices over a telephone system. Mr. Rankooa was also asked to ensure that Mr. Jabanga's witnesses were available to testify on the date the matter reconvened.

#### **The proceedings on 1 July 2012**

17. The present panel reconvened, on 1 July 2012. Mr. Kock advised that Lebogang had not been informed of the time of the hearing and would be arriving an hour or so late; and that Lebo was at an event outside the country and could not attend.
18. The chairman indicated to Mr. Rankooa that the present panel wished to see and hear Lebogang but enquired whether it would be appropriate to continue with the evidence in the meantime. Mr. Rankooa said that he did not have an objection to such an approach but he had been of the understanding that the evidence and cross examination was complete and he was to lead Mr. Jabanga's evidence.
19. The chairman indicated that the present panel had requested Lebogang's presence on the last occasion and wished to put questions to her and that once that had taken place both Mr. Rankooa and Mr. Kock would be afforded an opportunity to ask any questions they wished to. The hearing proceeded.
20. Mr. Jabanga then testified. In summary his evidence was that-
  - 20.1. The Phalula twins had not travelled with him to the Spar. They were transported and accommodated by the event organizers;

- 20.2. He, Mrs. Jabanga, and the minor athlete had travelled to the Spar and had found the Phalula twins already there shortly before the race began;
- 20.3. He had not given Lebogang any substance, at all, prior to the race.
21. Mr. Kock challenged Mr. Jabanga's evidence and, as with the SAIDS evidence, the nature, extent, and effect of this attack and the issues raised by the present panel, as regards the evidence of all the witnesses that testified on 1 July will be dealt with below.
22. Mrs. Jabanga testified largely as did Mr. Jabanga and the question of contradictions will, again, be dealt with below. The same is true of the minor. Both of these witnesses, in essence, said that the Phalula twins had not travelled with them to the Spar and it was rather the three of them in the motor vehicle.
23. The present panel then recalled Lebogang and put certain questions to her. In response to questioning from the panel Lebogang immediately identified the minor as having been in the motor vehicle along with the Phalula twins and Mr. and Mrs. Jabanga. This contradiction with her previous evidence will be dealt with along with matters raised with her by Mr. Kock and Mr. Rankooa hereafter.
24. After the evidence had been concluded the chairman raised with each of Mr. Kock and Mr. Rankooa the questions whether-
- 24.1. They would prefer to submit written argument or argue the matter there and then;
- 24.2. Once the matter had been argued, and on the understanding the present panel had not formed any view of the matter at all, Mr. Jabanga was found guilty, the question of sanction should be dealt with in these written submissions or rather by way of evidence prior to specific representations.
25. Mr. Rankooa suggested that written submissions should be considered, on the question of guilt or innocence but that if Mr. Jabanga were found guilty then he would wish to lead evidence regarding sanction prior to arguing about that. Mr. Kock felt that the relevant evidence had been submitted, that oral argument would suffice as the issue in dispute was crisp, but as with Mr. Rankooa said these were suggestions and the present panel should decide the way forward. The present panel ruled that oral argument on guilt or innocence should be provided while the matter was fresh but that, thereafter, the parties could supplement these arguments in writing if they

believed that to be appropriate or necessary. As it turned out neither party believed that to be necessary after making their arguments to which we now turn.

### **The arguments of the parties**

26. Mr. Kock argued that SAIDS had proved its case and that, while there had been certain contradictions in the evidence of Lebogang, in the main the question of the number of persons in Mr. Jabanga's motor vehicle, this contradiction had been explained by Lebogang on the basis that she had omitted to mention this because she had been thinking first of being picked up at her home, taken to collect Mrs. Jabanga and the minor, and only then had they travelled to the Spar.
27. This aspect aside Mr. Kock submitted that the evidence of the Phalula twins had been consistent. On the contrary, said Mr. Kock, the evidence of Mr. Jabanga was improbable and also contradicted that of Mrs. Jabanga.
28. The improbabilities, in summary, related to the suggestion that – in relation to an elite athlete - he had not checked with Lebogang how she was before the Spar, had no actual knowledge of how she was getting to the Spar and seemed not to have even checked, had not followed up after she tested positive what was happening to her or ensured that he was available to attend the Phalula hearing when it sat.
29. The contradiction with Mrs. Jabanga was that, to excuse his lack of involvement in the Phalula hearing – when, as Mr. Kock put it, Mr. Jabanga could have attended to set the record straight when SAIDS had expressly asked him to respond – Mr. Jabanga said he was in the Eastern Cape (Willowvale to be precise) for some three months and had not known of the hearing particulars when Mrs. Jabanga was very clear that they had only been there for two weeks around Christmas.
30. Mr. Kock pointed to other aspects of the evidence which he felt merited criticism including that-
  - 30.1. Mr. Jabanga said, belatedly, that he believed the proceedings before the present panel to be about charges against Lebogang, while Mrs. Jabanga, and of course Mr. Rankooa, clearly knew this was not so;
  - 30.2. there had been contradictions as to precisely where Mr. Jabanga had parked on the day of Spar and where the start line for the race was as between Mr. and Mrs. Jabanga and the minor;

- 30.3. there was talk of contracts, but no payment, and an attempt, on the one hand, to talk of telling athletes about anti doping – of which Mr. Jabanga had personal experience – but at the same time an avoidance of any actual responsibility for assessing what his athletes were taking when they took it after he had been with them at a Dischem Pharmacy where he paid for substances they procured.
31. According to Mr. Kock the evidence of the minor could not be relied upon insofar as the power relationship between the minor and Mr. Jabanga was clearly such that she had been told to present a version and she did just that but in circumstances in which she had testified that she slept over at Mr. Jabanga's home, clearly felt he was a father figure, and should not have been called upon to testify at all.
32. Mr. Rankooa argued forcibly that SAIDS had failed dismally to meet the onus upon it. SAIDS had brought charges, SAIDS had relied upon the evidence of the Phalula sisters and this evidence was contradictory and should be rejected. Mr. Rankooa pointed specifically to-
- 32.1. the failure on the part of Lebogang – or Lebo - to mention anything about the minor until Lebogang testified on the 1<sup>st</sup> of July;
- 32.2. neither of Lebogang or Lebo mentioning that Mr. Jabanga had first collected the sisters and only then collected Mrs. Jabanga and the minor.
33. Mr. Rankooa had also pointed out, during his cross examination of Lebogang, that there was a conflict as between the number of pills Lebogang referred to in the affidavit provided and in her evidence. Mr. Rankooa said, in relation to Lebo's evidence that she could be expected to, and did, lie in defense of her twin sister. Mr. Rankooa also pointed to the fact that in Lebogang's own affidavit she had referred to her sister, Lebo, "*reminding*" her of the pills given to her by Mr. Jabanga.
34. In the end, said Mr. Rankooa, SAIDS had relied upon a version put forward by Lebogang which was constructed with a view to Lebogang triggering the provisions of the Code which allowed the Phalula panel to reduce the sanction in her case. That was her intention, that was what she achieved, and not only should Mr. Jabanga be found not guilty, the sanction should be revisited.



### Assessment of the evidence

35. As Mr. Rankooa argued it is for SAIDS to establish that an anti-doping violation has occurred. As Article 3.1 of the Code puts it *"SAIDS has the burden of establishing that an anti-doping rule violation has occurred. The standard of proof shall be whether SAIDS has established an anti-doping rule violation to the comfortable satisfaction of the hearing panel bearing in mind the seriousness of the allegation that is made. This standard of proof is greater than a mere balance of probability but less than proof beyond a reasonable doubt."* (The emphasis and underling is added).
36. SAIDS relied upon the evidence of the Phalula twins. And as Mr. Rankooa argued there were contradictions and difficulties in their evidence. The principle difficult related to the presence, in Mr. Jabanga's motor vehicle of the minor. Neither of Lebogang or Lebo mentioned the minor when they first gave evidence and it became apparent, not only from the evidence of Mr. and Mrs. Jabanga, but also Lebogang herself, when physically present, that the minor had been in the motor vehicle.
37. Mr. Rankooa went further and said also that the version of Lebogang when she gave evidence telephonically, on the 12 April was that they had travelled directly from her home to the Spar. They had not, as she testified when physically present, gone from her home to collect the others.
38. While Mr. Rankooa did not focus specifically on the question of the number of pills that had been provided in argument this too was raised by him during cross examination as a criticism. In addition, and this was raised in argument, there was the matter of when Lebogang recalled the matter of pills being handed over and in what circumstances.
39. In addition to these matters the present panel is alive to the fact that the evidence of Lebogang and Lebo must be viewed with caution. As Mr. Rankooa put it Lebogang had ample reason to want to demonstrate how the prohibited substance entered her body and to blame this on someone else. And Lebo, her twin sister, would want to assist her.
40. The present panel found the question of the missing minor to be the most concerning feature in deciding whether to accept evidence as true or not. Lebogang's explanation was that she had been thinking of the first part of the trip which was from her home to that of Mr. Jabanga and that the minor had been present during the

second part of the trip and she had not focused on this because it was not really an issue for her.

41. There are features of Lebogang's evidence, demeanour, and the timing of her explanation regarding the minor which support her-

41.1. Firstly, the questioning by Mr. Kock, Mr. Rankooa, and the present panel, on 12 April focused on where individuals, being the twins vis a vis Mr. and Mrs. Jabanga had been positioned. Put differently the questioning really focused on whether or not they were in the motor vehicle rather than whether someone else was. So, while Mr. Rankooa did mention the minor, at the very end of his cross examination, it was put to Lebogang as part of a version which said Mr. Jabanga had travelled without the twins and a Lerato was mentioned – interestingly he also mentioned another person – by the name of Ms. Phaka but that went no further for some reason;

41.2. Secondly, when Lebogang attended the proceedings on 1 July she, without having any version put to her or knowing what had been said until then, immediately identified the minor, whose name she did not know, as being a person who had been in the car with the Jabanga's and the Phalula twins. She then explained the different trips. This was not under any pressure from anyone and it is difficult to see what reason she could have had for informing the panel of this if she was not being honest;

41.3. Thirdly, Mr. Kock, until then, had been doing his level best to demonstrate, via cross examination, that the minor had not been in the motor vehicle because he clearly thought that was so. While there were contradictions in the evidence of Mr. and Mrs Jabanga and the minor regarding where the motor vehicle was parked vis a vis where the start line was it became apparent when Lebogang testified in person that all of these individuals had clearly been in the vehicle on the day and the contradictions were errors in description. The point is, without suggesting in any way that Mr. Kock would be party to an attempt to mislead, he could not have discussed any of this with Lebogang before the hearing of 1 July because he continued to be under the impression that the minor had not been in the motor vehicle until Lebogang informed the present panel of this;

41.4. Fourthly, despite it being put, bluntly, to Lebogang, by Mr. Rankooa and the present panel, that she was lying, the impression she created was good. The

contradictions raised by Mr. Rankooa other than that of the minor were not of such a nature as to throw real doubt upon her testimony. And the manner in which she, of her own accord, dealt with the matter of the minor, while on the face of it cause for concern was adequately explained and left the panel convinced she, and Lebo, had been telling the truth.

42. Consequently and after applying caution the present panel is of the view that the evidence of the Phalula twins is, to the comfortable satisfaction of the present panel, true. Of course this is not the end of the matter because in proceedings such as these the panel must weigh up the competing version of Mr. Jabanga to establish whether on an overall analysis of the evidence one of the versions is true. If the panel is left in doubt then the question of the burden being upon SAIDS, would mean that Mr. Jabanga should be found not guilty of the charges put to him.
43. A number of the inconsistencies and difficulties with the version of Mr. Jabanga and his witnesses were not directly relevant. For instance he was challenged about the question of a contract with the Phalula twins and even with the minor, it being suggested that he was benefitting from the efforts of these athletes and not performing development in the way he said he was.
44. While this could, if clear to the present panel, be an issue which could perhaps relate to the question of intention or motive for handing over pills, the entire matter was left rather confused and is an issue which the panel, whilst not ruling it inadmissible, has not taken into account in these findings.
45. Another matter which was raised by Mr. Kock as between the respective witnesses related to where Mr. Jabanga's motor vehicle was parked on the day, where the start line for the Spar was, and other matters of consistency such as these. Again as it turned out it was clear that the minor, Mr. Jabanga, and Mrs. Jabanga had certainly been in his vehicle on their version and even the version corrected on 1 July by Lebogang. Consequently these are differences which are clearly simply errors and do not demonstrate a lack of truthfulness.
46. More concerning to the present panel were the following features of the evidence of Mr. Jabanga when he was placed under cross-examination and even when questioned for clarity:
  - 46.1. Mr. Jabanga said he had not received the documentation in respect of the hearing for Lebogang because he had been away in Willovale for three

months. He also said that while he had heard that Lebogang had tested positive and later that she had alleged he had given her certain pills, he did not find it necessary to attend the hearing then (because he was away in Willovale for this lengthy period he said and did not have access to any communication such as email and he could not use his cellular telephone) or even to provide a written statement to SAIDS.

- 46.2. Mrs. Jabanga, however, testified that the Jabangas had indeed gone to Willovale but she was quite certain that they had only been there for two weeks and this was over the Christmas period. This was a serious contradiction because Mr. Jabanga spent a significant amount of time attempting to explain the fact that he had not come to the Phalula hearing to explain himself when, on his version, he had an easier explanation being that he had not even been with the Phalula twins when the pills were allegedly handed to Lebogang.
- 46.3. Mr. Jabanga clearly had significant experience in athletics and also of anti-doping processes and procedures and consequently was well aware of the seriousness of the charges against Lebogang. His failure to take the matter sufficiently serious even to ensure that he was present when an athlete from his club was charged is more than concerning. It suggests he did not want to be there and expose himself in a situation in which he was clearly well aware that allegations had been made against him.
- 46.4. When it comes to the events of the day, it was also very strange that Mr. Jabanga while saying that the event organisers had arranged for the Phalula twins to get to the Spar and for them to be accommodated, then knew no more than this. He also did not seem even to have checked with the Phalula twins how they were getting there, he did not know how they were getting home, and yet he took some of their clothing on the day and put it in his car.
- 46.5. It has to be said that Mr. Jabanga did not make a very good impression with the present panel. His version was, if he was to be believed, a very simple one. One would have expected him to have been able to say that he had checked with particular event organisers in respect of the Phalula twins who he described as his elite athletes, exactly where they were going, where they

were staying, and he would have been able to provide these particulars to the present panel if this was true.

- 46.6. Furthermore one would certainly have expected him to have been present at the proceedings before the Phalula panel and to have taken an avid interest in what was happening, particularly if he was innocent. Once he heard, and it became apparent that he had heard through the evidence of Mrs. Jabanga, that it was being suggested he had given pills to Lebogang it is almost impossible to believe he would not have rushed to the proceedings before the Phalula panel, made every effort to get hold of SAIDS, and done everything in his power to ensure there was no thought that he was in some way involved.
- 46.7. There were also some concerning features about the evidence of the respective witnesses for Mr. Jabanga. They each seemed quite determined to talk about roads they had travelled to on the way to the Spar in order, it appeared, to show that there had been no effort to by-pass, perhaps, the homes of the Phalula twins. That may simply be a perception, but it struck the present panel that there was a degree of contrivance about the evidence that was presented.
- 46.8. Of course the truly concerning aspect of all of this is that, if the present panel is correct, then Mrs. Jabanga and the minor have been prevailed upon to lie in an effort to support Mr. Jabanga. It is concerning enough for Mr. Jabanga to be lying but for this to involve a number of other persons is extremely concerning to the present panel.
- 46.9. For this reason the present panel has done its best to carefully consider the evidence and reach a conclusion. Whilst caution must also of course be applied to evidence of spouses and to minors and as Mr. Kock argued it was apparent that the minor here was significantly under the spell to use a colloquial phrase of the Jabanga's the fact is that even without applying caution to their evidence the contradictions between their aversions and the fact of Mr. Jabanga's attitude to the proceedings before the Phalula panel mean that the present panel is comfortably satisfied even without applying cautionary rules that Mr. Jabanga's version is not a truthful one.

**The findings of the present panel**

The present panel finds Mr. Jabanga guilty of contravening Article 2.8. Mr Rankooa indicated that if there was a guilty finding he would wish to lead evidence in mitigation of sanction and in fairness to Mr. Jabanga that is clearly appropriate in a case such as this. Consequently the matter should be re-convened as soon as reasonably possible to deal with the question of sanction and both SAIDS and Mr. Jabanga, through their respective representatives of course, are requested to ensure that any witnesses they may wish to lead are present and available on the reconvened date.

Dated at

Umhlanga on 11 July 2012



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**Michael Murphy****Legal Representative and Chairperson**

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**Yusuf Carrim****Sports Administrator Representative**

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**Dr Sello Motaung****Medical Representative**