

4250

ENVIRONMENTAL & LAND COURT  
MACHAKOS  
**RECEIVED**  
19 OCT 2023

**REPUBLIC OF KENYA**

**IN THE ENVIRONMENT AND LAND COURT AT MACHAKOS 90100,  
PETITION NO.....4.....OF 2023 MACHAKOS.**

**IN THE MATTER OF THE CONSTITUTION OF KENYA**

**AND**

**IN THE MATTER OF VIOLATION OF ARTICLES 43(1) (b) (c) AND (d) AND  
ARTICLE 28 OF THE CONSTITUTION OF KENYA**

**AND**

**IN THE MATTER OF ARTICLES 2(6), 19, 20, 22, 23, 29, 35 1(a) (b), ), 40 (1)  
(3), 47 AND 48 OF THE CONSTITUTION**

**AND**

**IN THE MATTER OF ARTICLE 25 OF THE UNIVERSAL DECLARATION OF  
HUMAN RIGHTS (UDHR), ARTICLE 11 OF THE INTERNATIONAL  
COVENANT OF ECONOMIC, SOCIAL AND CULTURAL RIGHT (ICESCR),  
ARTICLE 17 OF THE INTERNATIONAL COVENANT OF POLITICAL AND  
CIVIL RIGHTS AND ARTICLE 18 OF THE AFRICAN CHAPTER OF HUMAN  
AND PEOPLE RIGHTS (ACHPR) AS APPLIED IN KENYA UNDER ARTICLE  
2(5) & (6) OF THE CONSTITUTION OF KENYA**

**AND**

**IN THE MATTER OF THE CONSTITUTION OF KENYA (PROTECTION OF  
RIGHTS AND FUNDAMENTAL FREEDOM) PRACTICE AND PROCEDURE  
RULES 2013, RULE 3, 4, 5, 9 AND 10)**

**BETWEEN**

**KENYA HUMAN RIGHTS COMMISSION ..... 1<sup>ST</sup> PETITIONER  
MAZINGIRA INSTITUTE..... 2<sup>ND</sup> PETITIONER**

**VERSUS**

**EAST AFRICA PORTLAND CEMENT COMPANY..... 1<sup>ST</sup> RESPONDENT  
ATTORNEY GENERAL.....2<sup>ND</sup> RSPONDENT**

**CERTIFICATE OF URGENCY**

I, **KELLY MALENYA**, an advocate of the High Court of Kenya and practicing as such in the firm of **Chimei & Malenya Company Advocates** do hereby certify this matter to be of **utmost urgency** and fit to be heard on priority basis for the following reasons **THAT: -**

1. On 9<sup>th</sup> October 2023 Lady Justice A. Nyukuri struck out **Machakos ELC Case No. 74 of 2014, consolidated with Petition No. 10 of 2018**, and declared the 1<sup>st</sup> Respondent as the legitimate owner of the land designated as LR No. 10424, located within the Athi River in Mavoko, Machakos County.

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8375

2. On 14<sup>th</sup> October 2023, the 1<sup>st</sup> Respondent without any notice commenced demolitions of structures which include homes, churches and schools erected on the said parcel of land;
3. On 17<sup>th</sup> October 2023, as the demolitions were proceeding, the 1<sup>st</sup> Respondent advertised in all the local newspapers its intention to sell
4. The court in delivering its judgment in ELC Case No. 74 of 2014, consolidated with Petition No. 10 of 2018 did not in any way approve of any evictions and demolitions.
5. When the officials of the 1<sup>st</sup> Respondent unlawfully entered and demolished the occupants' houses on the parcel land LR No. 10424 (**hereinafter referred to as the suit premises**), the occupants were never and have never been served with any notice and/or court order authorizing the demolitions of their homes.
6. **Sections 152 C, D & E of the Land Act** make it a mandatory requirement for a notice of at least 3 months to be issued before evictions are conducted on either public, community or private land. Section 152E specifically provides;

**152E. Eviction Notice to unlawful occupiers of private land.**

**(1) If, with respect to private land the owner or the person in charge is of the opinion that a person is in occupation of his or her land without consent, the owner or the person in charge may serve on that person a notice, of not less than three months before the date of the intended eviction.**

7. **Section 152G of the Land Act** provides for mandatory requirements for evictions which include among others; proper identification of persons conducting the evictions, presentation of formal authorization for the eviction, to be carried out in a manner that respects the dignity, right to life and security of those affected;
8. Further, under the **UN BASIC PRINCIPLES AND GUIDELINES ON DEVELOPMENTBASED EVICTIONS AND DISPLACEMENT** any eviction

must be ; authorized by law, carried out in accordance with international human rights law, undertaken solely for the purpose of promoting the general welfare, reasonable and proportional, regulated so as to ensure full and fair compensation and rehabilitation and carried out in accordance with the guidelines;

9. The demolitions occasioned by the 1<sup>st</sup> Respondent on structures erected on the suit premises are a violation of the homeowners' right to inherent human dignity, security of person, and to accessible and adequate housing.
10. The owners of the demolished buildings have suffered an immense loss of their properties, goods, and homes.
11. The continuing demolitions and the actions of the 1<sup>st</sup> Respondent are a gross violation of the occupants' human rights, an attack on their human dignity, and a contravention of their social and economic rights
12. That the 1<sup>st</sup> Respondent is still carrying on with the demolitions and eviction with more members anticipating the destruction of their homes and structures;
13. That unless the Honourable court intervenes, the occupants of the suit premises stand the risk of facing illegal, forceful, and arbitrary demolitions and evictions with great damage to their property.
14. Equally, unless the said Application is heard and disposed of expeditiously, and stay orders granted, this petition together with the accompanying application shall be rendered nugatory.

Dated at **Nairobi** this **18<sup>th</sup>** day of **October** 2023



**CHIMEI & MALENYA COMPANY**  
**ADVOCATES FOR THE PETITIONER**

**DRAWN & FILED BY:-**

CHIMEI & MALENYA CO. ADVOCATES,  
UCHUMI HOUSE, 8<sup>TH</sup> FLOOR,

AGA-KHAN WALK,  
P.O. BOX 19958-00100,  
**NAIROBI.**

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**TO BE SERVED UPON:-**

EAST AFRICA PORTLAND CEMENT COMPANY

ATHI-RIVER OFF NAMANGA ROAD

**MAVOKO**

HONORABLE ATTORNEY GENERAL  
SHERIA HOUSE, HARAMBEE AVENUE  
P.O BOX 40112-00100

**NAIROBI**



**REPUBLIC OF KENYA**  
**IN THE ENVIRONMENT AND LAND COURT AT MACHAKOS**  
**PETITION NO.....4.....OF 2023**

**IN THE MATTER OF THE CONSTITUTION OF KENYA**

**AND**

**IN THE MATTER OF VIOLATION OF ARTICLES 43(1) (b) (c) AND (d) AND  
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**AND**

**IN THE MATTER OF ARTICLES 2(6), 19, 20, 22, 23, 29, 35 1(a) (b), 40 (1)  
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RIGHTS AND FUNDAMENTAL FREEDOM) PRACTICE AND PROCEDURE  
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**BETWEEN**

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**MAZINGIRA INSTITUTE..... 2<sup>ND</sup> PETITIONER**

**VERSUS**

**EAST AFRICA PORTLAND CEMENT COMPANY.....1<sup>ST</sup> RESPONDENT**  
**ATTORNEY GENERAL.....2<sup>ND</sup> RESPONDENT**

**NOTICE OF MOTION**

*(Pursuant to Rule 19 of the Constitution of Kenya (Protection of Human Rights  
and Fundamental Freedoms) Practice and Procedure Rules 2013 and all other  
enabling provisions of the law)*

**TAKE NOTICE** that this Honourable Court shall be moved on the .....  
day of..... 2023 at 9.00 O'clock in the forenoon or so soon

thereafter as Counsel for the Petitioner/Applicant can be heard on an application for **ORDERS THAT:**

1. This Honourable Court be pleased to certify this matter as urgent and direct that the same be heard *ex-parte* on the first instance and thereafter on a priority basis.
2. Pending interpartes hearing of this application, the Honourable Court be pleased to issue an interim conservatory order against the 1<sup>st</sup> Respondent, their agents, and/or anyone acting under their instructions from carrying on with demolitions of the buildings constructed on the suit premises and eviction of the occupants of the premises on the said parcel of land.
3. Pending hearing and determination of this application, the Honourable Court be pleased to issue an interim conservatory order against the 1<sup>st</sup> Respondent, their agents and/or anyone acting under their instructions from carrying on with the demolitions of the buildings constructed on the suit premises and eviction of the occupants of the premises on the said parcel of land.
4. Pending hearing and final determination of this Petition, the Honourable Court be pleased to issue a conservatory order against the 1<sup>st</sup> Respondent , their agents, and/or anyone acting under their instructions from carrying on with the demolitions of the buildings constructed on suit premises and eviction of the occupants of the premises on the said parcel of land.
5. The costs of this application be in the cause.

**WHICH APPLICATION** is based on **GROUND THAT:-**

- a) There was an ongoing case with regard to land parcel LR No.10424 and 9<sup>th</sup> October 2023 Lady Justice A. Nyukuri struck out ELC Case No. 74 of 2014, consolidated with Petition No. 10 of 2018, and declared the 1<sup>st</sup> Respondent as the legitimate owner of the land designated as LR No. 10424, located within the Athi River in Mavoko, Machakos County.
- b) On 14<sup>th</sup> October 2023, just four days after the decision of the court had been delivered, the 1<sup>st</sup> Respondent commenced demolitions of structures and homes constructed on land parcel LR No. 10424.
- c) **Sections 152 C, D & E of the Land Act** make it a mandatory requirement for a notice of at least 3 months to be issued before evictions are conducted

on either public, community or private land. Section 152E specifically provides;

**152E. Eviction Notice to unlawful occupiers of private land.**

**(1) If, with respect to private land the owner or the person in charge is of the opinion that a person is in occupation of his or her land without consent, the owner or the person in charge may serve on that person a notice, of not less than three months before the date of the intended eviction.**

- d) **Section 152G of the Land Act** provides for mandatory requirements for evictions which include among others; proper identification of persons conducting the evictions, presentation of formal authorization for the eviction, to be carried out in a manner that respects the dignity, right to life and security of those affected;
- e) Further, under the **UN BASIC PRINCIPLES AND GUIDELINES ON DEVELOPMENTBASED EVICTIONS AND DISPLACEMENT** any eviction must be ; authorized by law, carried out in accordance with international human rights law, undertaken solely for the purpose of promoting the general welfare, reasonable and proportional, regulated so as to ensure full and fair compensation and rehabilitation and carried out in accordance with the guidelines;
- f) The 1<sup>st</sup> Respondent did not issue either a notice indicating an intention to evict the occupants and demolish their homes or a court order instructing the demolition of the homes and eviction of the homeowners.
- g) The 1<sup>st</sup> Respondent did not precede the demolitions and evictions with proper identification of those assigned to carry out the task.
- h) The 1<sup>st</sup> Respondent omitted, neglected, and/or refused to take into consideration the human rights standards related to forced evictions when carrying out the demolitions and evictions.
- i) Additionally, the 1<sup>st</sup> Respondent's actions of carrying out the violent and brutal demolition of homes is a violation of the homeowners' right to

inherent human dignity, security of person, and to accessible and adequate housing.

- j) That as a result of the demolitions the owners of the demolished buildings have suffered an immense loss of their properties, goods, and homes.
- k) That from the foregoing, it is evident that the 1<sup>st</sup> respondent's actions and the resultant demolitions are devoid of procedural fairness and thus a violation of the homeowners' right to human dignity, fundamental human rights, and fair administrative actions.
- l) That unless the Honourable court issues orders staying the continuing demolitions and evictions the owners of buildings constructed on the suit premises continue to suffer irreparable injury as they will be rendered destitute.
- m) That it is in the interests of justice and fairness that the orders hereinabove are sought.

**WHICH APPLICATION** is further supported by the affidavit of **DAVIS MALOMBE** annexed in the petition and on such further grounds as may be adduced at the hearing hereof.

**DATED at NAIROBI** this **18<sup>th</sup>** day of **October 2023**



**CHIMEI & MALENYA COMPANY**

**ADVOCATES FOR THE APPLICANT/PETITIONER**

**DRAWN & FILED BY:-**

CHIMEI & MALENYA CO. ADVOCATES,  
UCHUMI HOUSE, 8<sup>TH</sup> FLOOR,  
AGA-KHAN WALK,  
P.O. BOX 19958-00100,  
**NAIROBI.**

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**TO BE SERVED UPON: -**

1. EAST AFRICA PORTLAND CEMENT COMPANY



ATHI-RIVER OFF NAMANGA ROAD

**MAVOKO**

2. HONORABLE ATTORNEY GENERAL  
SHERIA HOUSE, HARAMBEE AVENUE  
P.O BOX 40112-00100

**NAIROBI**

ENVIRONMENTAL & LAND COURT  
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**REPUBLIC OF KENYA**  
**IN THE ENVIRONMENT AND LAND COURT AT MACHAKOS**  
**PETITION NO.....A.....OF 2023**  
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**AND**  
**IN THE MATTER OF VIOLATION OF ARTICLES 43(1) (b) (c) AND (d) AND**  
**ARTICLE 28 OF THE CONSTITUTION OF KENYA**

**AND**  
**IN THE MATTER OF ARTICLES 2(6), 19, 20, 22, 23, 29,35 1(a) (b), 40 (1)**  
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**RIGHTS AND FUNDAMENTAL FREEDOM) PRACTICE AND PROCEDURE**  
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**VERSUS**  
**EAST AFRICA PORTLAND CEMENT COMPANY.....1<sup>ST</sup> RESPONDENT**  
**ATTORNEY GENERAL.....2<sup>ND</sup> RESPONDENT**

**PETITION**

**TO:**  
**THE ENVIRONMENT AND LAND COURT,**  
**AT MACHAKOS.**

The humble petition of **KENYA HUMAN RIGHTS COMMISSION & MAZINGIRA INSTITUTE** whose address of service for purposes of this suit is care of **CHIMEI & MALENYA COMPANY ADVOCATES, UCHUMI HOUSE, 8<sup>TH</sup> FLOOR, SUITE NO. 9, AGA KHAN WALK, P.O BOX 19958-00100 NAIROBI. EMAIL: [malenya@cmcadvocates.co.ke](mailto:malenya@cmcadvocates.co.ke) / [chimei@cmcadvocates.co.ke](mailto:chimei@cmcadvocates.co.ke)** in the Republic of Kenya is as follows:-

**A. PARTIES**

1. The 1<sup>st</sup> petitioner is a non-governmental organization (NGO) whose core agenda is the campaign for the entrenchment of observance of human rights and a democratic culture in Kenya.
2. The 2<sup>nd</sup> Petitioner is a civil society organization established in Kenya and an active participant in the local and global social process.
3. The 1<sup>st</sup> Respondent is a body corporate with a common seal and perpetual succession and is registered as such.
4. The 2<sup>nd</sup> Respondent is the Government's principal legal advisor, responsible for representing the national Government in court or any other legal proceedings.
5. The petition is instituted in the public interest.

**B. FACTS**

6. There was an ongoing case with regard to land parcel LR No.10424 and 9<sup>th</sup> October 2023 Lady Justice A. Nyukuri struck out ELC Case No. 74 of 2014, consolidated with Petition No. 10 of 2018, and declared the 1<sup>st</sup> Respondent as the legitimate owner of the land designated as LR No. 10424, located within the Athi River in Mavoko, Machakos County.
7. On 14<sup>th</sup> October 2023 just 4 days after the decision of the court had been delivered, the 1<sup>st</sup> Respondent commenced demolitions of structures and homes constructed on land parcel LR No. 10424.
8. That the 1<sup>st</sup> Respondent did not issue either a notice indicating an intention to evict the occupants and demolish their homes or a court order instructing the demolition of the homes and eviction of the homeowners.
9. That the 1<sup>st</sup> Respondent did not precede the demolitions and evictions with proper identification of those assigned to carry out the task.
10. That the 1<sup>st</sup> Respondent omitted, neglected, and/or refused to take into consideration the human rights standards related to forced evictions when carrying out the demolitions and evictions.

11. The homeowners whose homes were demolished have suffered extensive damages and the owners of homes yet to be demolished live in great apprehension as the demolitions and evictions are currently ongoing.

### **C. LEGAL FOUNDATION**

12. **Article 2** of the Constitution of Kenya provides for the supremacy of the Constitution and that any act or omission in contravention of the Constitution is invalid.

13. **Article 3** of the Constitution behooves every person to respect, uphold and defend the constitution.

14. **Article 19** of the Constitution asserts that the Bill of Rights is an integral part of Kenya's democratic state.

15. **Articles 20, 21, 22, and 23** of the Constitution provide for the application, implementation, and enforcement of the Bill of Rights.

16. **Article 28** of the Constitution provides for respect and protection of the inherent human dignity.

17. **Article 29** of the Constitution provides for freedom and security with the right to not be treated in a cruel, inhuman, or degrading manner.

18. **Article 35** of the Constitution provides for the right of access to information.

19. **Article 40** of the Constitution provides for the protection of the right to property.

20. **Article 43** of the Constitution provides for economic and social rights including the right to accessible and adequate housing, to be free from hunger, and the right to clean and safe water.

21. **Article 47** of the Constitution provides for the right to a fair administrative action that is lawful, reasonable, and procedurally fair.
22. **Article 48** provides for access to justice for all persons.

#### **D. CONTRAVENTION**

##### **I. Economic, social rights and the right to inherent human dignity**

23. The demolition of the houses and the forced eviction of the homeowners on the suit premises resulted in the wanton destruction of their premises and the members of the community being left to live in desolate conditions.
24. The arbitrary evictions were a violation of their fundamental rights to inherent human dignity, security of the person, right to life, accessible and adequate housing, prohibition of forced evictions, reasonable standards of sanitation, health care services, clean and safe water in adequate quantities and to be free from hunger guaranteed by various legal provisions.
25. The 1<sup>st</sup> respondent was duty bound to respect the right to adequate housing and right to dignity of the owners of the demolished buildings, notwithstanding the fact that they did not hold title to the suit premises.

##### **II. Access to information**

26. The 1<sup>st</sup> respondent did not at any point before the demolitions issue a warning to the occupants of the suit premises.
27. Further the 1<sup>st</sup> Respondent did not give the occupants of the suit premises any or reasonable notice in writing or avail them any information regarding the evictions.

##### **III. Fair administrative action**

28. The ***UN Basic Principles and Guidelines on Developed Based Evictions and Displacement*** together with Section 152E of the Land Laws (Amendment) Act 2017, stipulate that evictions cannot be conducted subject to issuance of a three-month notice.

29. The 1<sup>st</sup> Respondent kicked off the demolitions merely 4 days after the court's decisions without taking the appropriate measures as required under the law including giving any or reasonable notice in writing or availing them information and reasons regarding the demolitions and evictions.

#### **IV. Protection of right to property**

30. The 1<sup>st</sup> respondent commenced the demolitions without according the occupants of the demolished homes an opportunity to salvage any of their belongings and this resulted in extensive damages to their various household goods in the process.

#### **E. PRAYERS**

31. The 1<sup>st</sup> Petitioner therefore humbly prays for;

- a. A declaration that the brutal demolition of the homes of the homeowners of the suit premises and leaving them to live in the open exposed to the elements and vagaries of nature is a violation of their fundamental rights to inherent dignity, accessible and adequate housing, reasonable standards of sanitation, healthcare services, freedom from hunger and the right to clean and safe water in adequate quantities.
- b. A declaration that the brutal demolition of homes of the homeowners without warning, any or reasonable notice in writing or availing them information regarding the evictions is a violation of their fundamental right of access to information.
- c. A declaration that the brutal demolition of homes of the homeowners and damage to their household goods in the process, and without according them an opportunity to salvage any of their belongings is a violation of their fundamental right to protection of property.
- d. A declaration that the brutal demolition of homes of the homeowners, any or reasonable notice in writing or availing them information and reasons regarding the demolitions and evictions is a violation of their fundamental right to fair administrative action.
- e. A permanent order of injunction restraining the respondent, its servants, officials, representatives, and/or agents, from intimidating, harassing, threatening, and bullying the homeowners of the suit premises.

- f. A declaration that the 1<sup>st</sup> respondent is liable to the owners of demolished homes for the loss of personal real or other properties or goods.
- g. Order that the 1<sup>st</sup> respondent pays compensation to the owners of the demolished buildings for the loss of personal real or other properties or goods.

**In the alternative and without prejudice to the foregoing,**

- h. Compensation for the loss of personal properties or goods.
- i. Compensation for general, aggravated, exemplary, and punitive damages against the respondent as may be assessed by the Honourable Court.
- j. Costs of the petition and interests thereon.
- k. Any other further relief that this Honourable court shall deem fit to grant.

**WHICH PETITION** is based on the supporting affidavit of **DAVIS MALOMBE** and other further grounds to be adduced at the hearing hereof.

**DATED at NAIROBI this 18<sup>th</sup> day of October 2023**



**CHIMEI & MALENYA COMPANY**

**ADVOCATES FOR THE PETITIONER**

**DRAWN & FILED BY:-**

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**BETWEEN**  
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**MAZINGIRA INSTITUTE..... 2<sup>ND</sup> PETITIONER**  
**VERSUS**  
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**ATTORNEY GENERAL.....2<sup>ND</sup> RESPONDENT**

**SUPPORTING AFFIDAVIT**

I, **DAVIS MALOMBE**, a resident of Nairobi within the Republic of Kenya c/o **CHIMEI & MALENYA ADVOCATES P.O BOX 19958-00100 Nairobi** do hereby make oath and state as follows: -

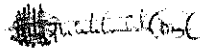
1. That I am a male adult of sound mind, the Executive Director of the 1<sup>st</sup> petitioner herein and I have the authority of the Petitioners to swear this Affidavit support of both the petition and the application.

2. That the 1<sup>st</sup> Petitioner is a non-governmental organization (NGO) whose core agenda is to campaign for the entrenchment of observance and implementation of human rights in Kenya.
3. I am advised by the 1<sup>st</sup> Petitioner's Advocates on record which advice I verily believe to be true that evictions ought to be carried out with due regard to the clear procedures set out in law and with observance of the human rights standards in place.
4. I am also advised by the 1<sup>st</sup> Petitioner's Advocates that the aspect of the occupants lacking title to the suit premises does not absolve the owner of the duty to uphold their right to inherent human dignity.
5. There was an ongoing case with regard to land parcel LR No.10424 and 9<sup>th</sup> October 2023 Lady Justice A. Nyukuri struck out ELC Case No. 74 of 2014, consolidated with Petition No. 10 of 2018, and declared the 1<sup>st</sup> respondent as the legitimate owner of the land designated as LR No. 10424, located within the Athi River in Mavoko, Machakos County.
6. On 14<sup>th</sup> October 2023 just 4 days after the decision of the court had been delivered, the 1<sup>st</sup> Respondent commenced demolitions of structures and homes constructed on land parcel LR No. 10424.
7. That the 1<sup>st</sup> Respondent did not issue either a notice indicating an intention to evict the occupants and demolish their homes or a court order instructing the demolition of the homes and eviction of the homeowners.
8. That the 1<sup>st</sup> respondent did not precede the demolitions and evictions with proper identification of those assigned to carry out the task.
9. That the 1<sup>st</sup> respondent omitted, neglected, and/or refused to take into consideration the human rights standards related to forced evictions when carrying out the demolitions and evictions.
10. That additionally, the 1<sup>st</sup> Respondent's actions of carrying out the violent and brutal demolition of homes was a violation of the homeowners' right to inherent human dignity, security of person, and to accessible and adequate housing.

11. That from the foregoing, it is evident that the 1<sup>st</sup> respondent's actions and the resultant demolitions are devoid of procedural fairness and thus a violation of the suit premises homeowners' right to human dignity, fundamental human rights, and fair administrative actions.
12. That unless the Honourable court issues orders staying the continuing demolitions and evictions the owners of buildings constructed on the suit premises stand to suffer irreparable injury as they will be rendered destitute.
13. Accordingly, unless the Honourable Court intervenes and determines the constitutional violations raised herein on merit, the 1<sup>st</sup> respondent's gross violation of human rights and dignity will go unchecked.
14. That I therefore swear this oath in support of the petition and application herein and the grant of the prayers sought therein.
15. That what is deponed to herein is true to the best of my knowledge, information, and belief save where the source of information is disclosed.

**SWORN** at **NAIROBI** by the said

**DAVIS MALOMBE**  
**This 18<sup>th</sup> day of October 2023**

1-  —

**BEFORE ME KUBAI**  
  
**COMMISSIONER FOR OATHS**

**DRAWN & FILED BY:-**

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**TO BE SERVED UPON: -**

EAST AFRICA PORTLAND CEMENT COMPANY  
ATHI-RIVER OFF NAMANGA ROAD

**MAVOKO**

HONORABLE ATTORNEY GENERAL  
SHERIA HOUSE, HARAMBEE AVENUE  
P.O BOX 40112-00100

**NAIROBI**