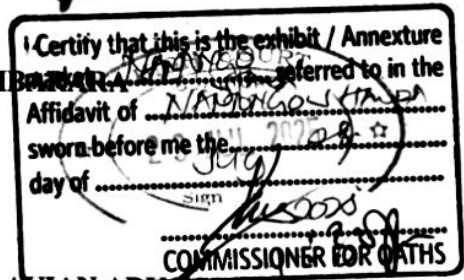


THE REPUBLIC OF UGANDA
IN THE HIGH COURT OF UGANDA AT MUBALABA

CIVIL SUIT NO. 89 OF 2025



1. GOD REMEMBERS E.V
2. EICKER LEA KATHARINA
(SUING THROUGH THEIR LAWFUL ATTORNEY AVIAN ADVOCATES)
3. GOD REMEMBERS MINISTRIES INTERNATIONAL (GRM) LIMITED
: : : : : PLAINTIFFS

VERSUS

1. NDYAGAMBA LAUBEN
2. NAMAGANDA WINFRED
3. MUKIIBI CATHERINE
4. ASINGWIRE MARION
5. AINEMBABAZI RACHAEL : : : : : DEFENDANTS

PLAINT

1. The 1st Plaintiff is a body Corporate and a Non- profit Organization based in Germany. The 2nd Plaintiff is a female adult Germany national of sound mind and a director of both the 1st and 3rd Plaintiffs. The 3rd Plaintiff is a Company limited by guarantee registered under the laws of Uganda with capacity to sue and be sued. The 1st and 2nd Plaintiffs are suing through their Lawful Attorney M/s Avian Advocates whose address of service for purposes of the suit is Plot 98/100, Bukoto Street and P.O BOX 161840, Kampala. Photocopies of the power of attorney and formal authorization from the majority subscribers of the 3rd Plaintiff to file this suit are attached hereto and marked as Annexure "A"
2. The Defendants are male and female adult Ugandans presumed to be of sound mind and the Plaintiffs' Advocates undertake to effect service of Court process upon them.
3. The Plaintiffs' cause of action against the Defendants is for Fraud, breach of fiduciary duty and duty of care, unjust enrichment, money, restitution, a permanent injunction against the Defendants, special, general, exemplary and aggravated damages, interest and costs of the suit. The Plaintiffs bring this suit against the Defendants jointly and severally seeking the order for;
 - a) A declaration that the 1st, 2nd, 3rd and 4th Defendants are in breach of their fiduciary duties as directors by acting contrary to the interests of the Plaintiffs

- b) A declaration that the 1st and 2nd Defendants' actions of registering the 3rd Plaintiff's school **REVIVAL FAITH PRIMARY SCHOOL** in their names and generating an income from the said school amount to fraud and unjust enrichment.
- c) A declaration that the 1st Defendant's actions of overvaluing the land comprised in **BLOCK 35 PLOTS 1361,1357,1355 and 1358**, in NTUNGAMO District, RWAMPARA at KYAMATE vide Lease hold tenure measuring approximately 2(two) Acres amount to fraud
- d) A declaration that the 1st Defendant's actions of failing to disclose his ownership of land comprised in **BLOCK 35 PLOTS 1361,1357,1355 and 1358**, in NTUNGAMO District, RWAMPARA at KYAMATE vide amount to fraud
- e) A declaration that the 1st Defendant's actions of refusing to effect transfers for the four untitled plots into the names of the 3rd Plaintiff without reasonable cause are fraudulent and unlawful
- f) A declaration that the 1st and 2nd Defendant's actions of amending the company tax identification number details and registering themselves as the only Directors and members of the 3rd Plaintiff with the Uganda Revenue Authority amount to Fraud
- g) An Order directing the 1st and 2nd Defendant to correct the TIN details with Uganda Revenue Authority by submitting the correct details
- h) An order for a permanent injunction restraining the Defendants, their agents, legal representatives or any other person acting under their authority from dealing or transacting on property comprised in **BLOCK 35 PLOTS 1361,1357,1355 and 1358** and the four untitled plots in NTUNGAMO District, RWAMPARA at KYAMATE in anyway and selling the properties belonging to the 3rd Plaintiff
- i) A declaration that the Defendants actions of removing some subscribers as Directors and members of the 3rd Plaintiff and appointment of unknown individuals as Directors are fraudulent and unlawful.
- j) An Order compelling the Defendants to avail a clear accountability and audited books of account for all the funds received from the 1st and 2nd Plaintiffs for the benefit of the 3rd plaintiff.
- k) An Order for the refund of UGX 11,000,000/= (Uganda Shillings Eleven Million) fraudulently withdrawn from the account of the 3rd Plaintiff by the 1st, 4th and 5th Defendants
- l) An Order for the refund and recovery of all the money received by the 1st, 2nd and 3rd Defendants for the school project from the year 2022-2024

- m) An Order for the dissolution of the 3rd Plaintiff Company
- n) An Order for the transfer of the assets funded and financed by the 1st and 2nd Plaintiffs to another Non-Governmental Organization
- o) An Order for special damages
- p) An Order for exemplary and aggravated damages to be issued against the Defendants
- q) General Damages
- r) Costs for the suit
- s) Any other relief this Court deems fit

4. The facts constituting the Plaintiffs' cause of action are as follows;

- i) In 2016, while in Uganda for a missionary visit, the 2nd Plaintiff met the 1st Defendant who claimed to be a Pastor with a vision of helping deserving destitute and orphaned children.
- ii) The 1st Defendant showed the 2nd Plaintiff photographs of a small project that he had started with an American friend, Michael Paul Fiedler which included a borehole, foundation of a children's home, a brick and wattle nursery school and a church constructed with poles and mats.
- iii) Following several requests from the 1st Defendant to the 2nd Plaintiff, the 2nd Plaintiff supported the said charity work for the first two and a half years with her personal income that she was earning while working as a nurse in Germany and usually sent the money via Western Union and World Remit.
- iv) In 2017, the 2nd Plaintiff visited Kyamate, Ntungamo to see the projects that were being handled by the 1st Defendant and a one MUGWANYA RONALD, and was touched by the necessitous conditions that the children were going through which prompted her to share the said plight with her family, church and community back in Germany, who began to support the projects and charity work.
- v) The 2nd Plaintiff and her community in Germany could only support the said charitable works through an organization and upon the 2nd Plaintiff extending funds to the 1st Defendant in 2018, the 3rd Plaintiff was incorporated as a Company Limited by Guarantee without a share Capital on the 9th day of March 2018, with objectives of preaching the gospel of Jesus Christ, helping the neediest of the needy and to build vocational training centers and orphanages among others. (A *Photocopy of the Certified Certificate of Incorporation is attached hereto and marked Annexure "B"*)
- vi) The 2nd Plaintiff, the 1st, 2nd and 3rd Defendants together with MUGWANYA RONALD, DAVID EICKER and DINA EICKER became the founding members and

first Directors of the company. (*A Photocopy of the said Form 20 is attached hereto and marked Annexure "C"*).

vii) The said incorporation was followed by a resolution registered on the 6th day of August 2018 naming the 1st, 2nd and 3rd Defendants as signatories to the company DFCU Bank Uganda Shillings Account via Account Number **01031026284525**, MASAKA BRANCH, which was to be used as the official means of sending money or funds from Germany to Uganda. (*A Photocopy of the said Certified Certificated resolution is attached hereto and marked Annexure "D"*)

viii) It was agreed between the 2nd Plaintiff and the 1st, 2nd and 3rd Defendants that the 2nd Plaintiff's work was to mobilize funds which were to be availed via the 3rd Plaintiff's Bank Account.

ix) Between the years of 2018-2019, the 2nd Plaintiff availed funds that she was able to earn and get through her personal efforts while working as a nurse in Germany, and the 3rd Plaintiff Company was able to build offices and a conference Hall in Lukaaya, KALUNGU District. The said offices are currently being used by the 2nd Defendant to run her personal projects at the expense of the 2nd and 3rd Plaintiffs (*Photos of the construction process are attached hereto and marked annexure "E"*)

x) On the 29th day of July 2020, the 2nd Plaintiff together with JOSIA EICKER and HARLE JOHANEES incorporated **GOD REMEMBERS E.V** the 1st Plaintiff, aimed at partnering and fundraising all the necessary funds and essentials which were to be extended to the 3rd Plaintiff for purposes of carrying out charity works and support of the needy and orphaned children.

xi) The 1st Plaintiff upon its registration in Germany opened up a bank account and appointed several employees including financial officers who were to ensure that the funds were collected and effectively sent to the 3rd Plaintiff through the 1st, 2nd and 3rd Defendants.

xii) The 3rd Plaintiff was eventually registered as a Foreign Non-Governmental Organization with the National Bureau for Non-Governmental Organizations on the 27th day of June, 2022, by virtue of it being solely funded by the 1st and 2nd Plaintiffs. (*A Photocopy of the Certificate of Registration is attached hereto and marked Annexure "F"*)

xiii) Between the year 2020 to October 2021, the 1st and 2nd Plaintiffs would send money on a monthly basis to support the activities of the 3rd Plaintiff directly to the 1st Defendant via World remit due to the general lockdown and also because the 3rd

Plaintiff had not yet opened up a Bank account much as they had registered a resolution.

- xiv) Between the months of June and October 2021, a total of approximately UGX 130,060,328/= (Uganda Shillings One Thirty Million Sixty Thousand Three Hundred Twenty Shillings) was sent to the 3rd Plaintiff by the 1st Plaintiff through its financial officer then, DAVID EICKER via world remit upon several requests by the 1st Defendant who collected the same. **(Copy of emails from World remit confirming sending and collection of funds by the 1st Defendant are attached hereto and marked group annexure “G”)**
- xv) The 1st and 2nd Plaintiffs aver that a lot of unrecorded funds were sent via World Remit even before the month of June 2021 much as their accounts were eventually closed because of sending huge sums of money to the 1st Defendant.
- xvi) To date, the 1st Defendant with the intention of defrauding the 1st and 2nd Plaintiffs has refused to avail a clear breakdown and accountability as to how the said amount was expended and the 2nd Plaintiff's efforts to cause the said Defendant to avail accountability for the said money have been futile.
- xvii) The 1st and 2nd Plaintiffs fundraised finances for the daily running of the 3rd Plaintiff, and in the year 2021, the 3rd Plaintiff received UGX 40,371,500/= from the 1st Plaintiff on the DFCU Bank Account for the months of November and December (Uganda Shillings Forty Million Three Hundred Seventy-One Thousand Five Hundred Shillings) which receipt of funds was acknowledged by the 1st Defendant. **(Photocopy of the acknowledgment of receipt of funds by the 1st Defendant is attached hereto and marked Annexure “H”)**
- xviii) In the year 2022, the 3rd Plaintiff received a sum of approximately UGX 470,102,3000/= (Uganda Shillings Four Hundred Seventy Million, One Hundred Two Thousand Three Hundred) from the 1st Plaintiff whose receipt was acknowledged by the 1st Defendant. **(Photocopy of the acknowledgment of receipt of funds by the 1st Defendant is attached hereto and marked Annexure “I”)**
- xix) In the year 2023, the 3rd Plaintiff received a sum of approximately UGX 517,669,040 (Uganda Shillings Five Hundred Twelve Million, Six Hundred Ninety-Six Thousand Forty) from the 1st Plaintiff whose receipt was acknowledged by the 1st Defendant. **(Photocopy of the acknowledgment of receipt of funds by the 1st Defendant is attached hereto and marked Annexure “J”)**

to effect transfer to the 3rd Plaintiff despite funds being fully availed by the 1st Plaintiff. *(Photocopies of the said agreements are attached hereto and marked group Annexure "N")*

- xxviii) Around October 2024, the 1st and 2nd Plaintiffs started questioning the conduct of the 1st and 2nd Defendants which was characterized by ambiguous accountability of the funds, mismanagement of office and unwillingness to let the 1st and 2nd Plaintiff access the 3rd Plaintiff's documents, books of accounts and other important files.
- xxix) Additionally, the 2nd Plaintiff also received numerous complaints from various ladies, some of whom were beneficiaries of the 3rd Plaintiff, and those who came for job interviews, alleging that the 1st Defendant, who is the acting CEO had sexually harassed them.
- xxx) The 2nd Plaintiff could not take the said serious allegations lightly and informed the Board members in Uganda about the same, asked them to conduct independent investigations with the aim of protecting the 3rd Plaintiff's reputation.
- xxxi) The 1st, 2nd and 3rd Defendants appointed Counsel **WEKESA PROSSY** and several investigations were conducted, after which it was concluded that there was indeed sexual harassment by the 1st Defendant as per the evidence presented by several victims. *(Photocopy of the report is attached hereto and marked Annexure "O")*
- xxxii) The said allegations created a rift between the 2nd Plaintiff and the 1st and 2nd Defendants who started threatening her and all the volunteers and representatives from the 1st Plaintiff who had come to monitor the sponsored projects.
- xxxiii) When the 1st and 2nd Plaintiffs plus some members of the 3rd Plaintiff requested for the updates, breakdowns and explanations on the usage of the funds received and withdrawn, the Defendants started extending threats to the 2nd Plaintiff and the 1st Plaintiff's representative who had come to follow up on the accountability and usage of the funds, which was for purposes of acquiring tax waivers for the sponsors that had contributed the funds in Germany.
- xxxiv) The failure of the 1st, 2nd and 3rd Defendants to avail the necessary documentation prompted the Plaintiffs to conduct a Company search with the Uganda Registration Services Bureau and noticed that several illegal and fraudulent changes and entries had been made by the Defendants contrary to the provisions of the Companies Act cap 106 and the Memorandum and Articles of Association of the Company.

- xxxv) On the 16th October 2023 contrary to the provisions of the Company's Memorandum and Articles of Association, members including MUGWANYA RONALD, DINA EICKER and DAVID ECKER were not only removed as Directors of the company, but also as members of the company without any notices and meetings to that effect yet they continued working and sponsoring the activities of the 3rd Plaintiff. *(Photocopy of the certified resolution is attached hereto and marked Annexure "P")*
- xxxvi) On the 30th day of January 2025, without any notice to the Plaintiffs, the 1st, 2nd and 3rd Defendants unlawfully appointed KAMOGA JOHN, MUHWEZI BOAZ, SSERUWU STEVEN through an Ordinary resolution as Directors.
- xxxvii) The said resolution further appointed the 2nd Defendant NAMAGANDA WINFRED as a Director despite her already being among the initial directors appointed at the incorporation of the 3rd Plaintiff. *((Photocopy of the resolution is attached hereto and marked Annexure "Q")*
- xxxviii) The 1st and 2nd Defendants further submitted another resolution forging the 2nd Plaintiff's signature purporting that she had resigned from the company, which resolution was rejected by the URSB and the 1st Defendant admitted having made the said forgeries. *(Photocopy of the said document is hereto and marked Annexure "R")*
- xxxix) Between the years 2022-2024, the 1st Defendant proposed that the 1st and 2nd Plaintiff avail funds for construction of extra classrooms at REVIVAL FAITH PRIMARY SCHOOL, a school which has always been fully sponsored by the said Plaintiffs.
- xl) Indeed, several funds amounting to a total of approximately UGX 236,205,000/= (Uganda Shillings Two hundred Thirty-Six Million, Two hundred Thousand Five Thousand) was invested and expended in the year 2024 and the same was meant to facilitate for salaries, benches, tables, supporting school children, building classrooms amongst others. *(Photocopy of the budget for the said funds and reflection on the bank Statement is attached hereto and marked Annexure "S")*
- xli) Upon conducting search with the URSB, the 1st, 2nd and the majority members of the 3rd Plaintiff were astonished when they noticed and learned that the said school was registered in the names of the 1st and 2nd Defendant together with a one KIRABO ESTHER who is a daughter of the 1st and 2nd Defendants. *(Photocopy of the said search is hereto and marked Annexure "T")*

- xlii) When questioned why the school had been registered in their personal names, the 1st and 2nd Defendant responded by stating that the 3rd Plaintiff was their Organization and were therefore not answerable to the 1st and 2nd Plaintiffs.
- xliii) In addition to the 1st and 2nd Defendant's refusal to register the school into the names of the 3rd Plaintiff, they insisted that the land where the said school was constructed belongs to their Family despite the Certificate of Title clearly indicating that the said land belongs to the 3rd Plaintiff.
- xliv) Several efforts to register the school under the 3rd Plaintiff were futile due to the 1st and 2nd Defendants' refusal to sign the relevant documents despite several reminders.
- xlvi) The actions of the 1st and 2nd Defendants were an eye opener to the 1st and 2nd Plaintiffs who also discovered that the said Defendants had misused the funds donated by the volunteers and sponsors who would use the Guest House whenever they would come to Uganda to follow up on the 3rd Plaintiff's projects. *(Photocopy of the breakdown availed is attached hereto and marked Annexure "U")*
- xlvi) The 1st, 2nd, 3rd and 4th Defendants have continued with their chaotic behavior of threatening the 2nd Plaintiff and also recently ordered for the burial of a homeless woman in one of the plots belonging to the 3rd Plaintiff which was bought for agricultural purposes.
- xlvi) The 1st and 2nd Defendants through an ordinary resolution dated 2nd of June 2025, while forging signatures of other members and without their consent, appointed their relatives and friends as directors and these include KAMOGA JOHN MUKASA, KIRUNDA ALI and AINEMBABAZI RACHEAL. *(Photocopy of the resolution is attached hereto and marked Annexure "V")*
- xlviii) In another resolution dated 2nd June 2025, the 1st Defendant fraudulently appointed himself as a principal signatory to the bank account cosigning with the 4th and 5th Defendant in a bid to steal the sum of 11,000,000/= (Uganda Shillings Eleven Million only) which was indeed stolen and withdrawn by the said Defendants on 13th day of June 2025. *(Photocopy of the resolution and withdraw notification is attached hereto and marked Annexure "W")*
- xlvi) To date, the said Defendants have resorted to threatening the 1st and 2nd Plaintiffs with legal action if they do not avail the bank statements for the 1st Plaintiff. *(Photocopy of the Letter is attached hereto and marked Annexure "X")*

- l) Additionally, the 1st and 2nd Plaintiff shall aver that whereabouts of the children and beneficiaries who were being sponsored by the 3rd Plaintiff are unknown as the Defendants have allegedly taken them to their own homes, leaving the constructed children homes empty and the money and farming land apportioned for the benefit of the said beneficiaries is currently being exploited by the said Defendants.
5. The Plaintiffs shall aver that the actions of the Defendants of registering the 3rd Plaintiff's school in their names, overvaluing land purchased by the 3rd Plaintiff, refusing to give a clear accountability of the funds, forging signatures, submitting false information with to the Uganda Revenue Authority, effecting unlawful changes and registration on the 3rd Plaintiff's Company Registry without notices and proper procedures are fraudulent for which the Plaintiffs shall pray for exemplary damages from the Defendants jointly and severally.

PARTICULARS OF FRAUD BY THE DEFENDANTS;

- a) Registering Revival Faith Primary School in the 1st and 2nd Defendant's name and a one KIRABO ESTHER without the knowledge and consent of the Plaintiffs.
- b) Deceiving the 1st and 2nd Plaintiffs that the school could not be registered in the name of the 3rd Plaintiff
- c) Fraudulently purchasing the untitled plots in the names of the 1st Defendant instead of the names of the 3rd Plaintiff despite the funds being availed by the 1st Plaintiff for the benefit of the 3rd Plaintiff
- d) Fraudulently overvaluing land comprised **BLOCK 35 PLOTS 1361,1357,1355 and 1358**, In NTUNGAMO District, RWAMPARA land at KYAMATE Lease hold tenure that was sold by the 1st Defendant to the 3rd Plaintiff
- e) Continuously receiving funds from the 1st Plaintiff for the support and running of the school which is registered in the 1st and 2nd Defendant's names.
- f) Over pricing of the monthly budgets of the 3rd Plaintiff
- g) Amending the TIN details of the 3rd Plaintiff with Uganda Revenue Authority insisting that the 1st and 2nd Defendants are the only Directors of the 3rd Plaintiff
- h) Submission of the 1st and 2nd Defendant's personal details as the 3rd Plaintiff's login details to the Uganda Registration Service Bureau and continuously changing passwords and controlling the operations of the 3rd Plaintiff in an unlawful manner
- i) Forging signatures on several resolutions in a bid to personalize the 3rd Plaintiff and avoid accountability

- j) Deliberately refusing to provide the 1st and 2nd Plaintiffs with clear accountability for the funds and sums extended to the 3rd Plaintiff.
 - k) Effecting unlawful and fraudulent changes to the 3rd Plaintiffs company registry such as removal of the subscribers as directors and members of the 3rd Plaintiff without notices or meetings.
 - l) Continuously receiving funds and sponsorship from some subscribers after their removal as members and directors
 - m) Withdrawing money from the 3rd Plaintiff's account despite the discontinuance of most programs.
 - n) Unlawfully appointing new Directors of the 3rd Plaintiff without notice and knowledge of the Plaintiffs.
6. The 1st and 2nd Plaintiffs aver and contend that due to the Defendants' fraudulent actions, the said Plaintiffs lost and incurred financial loss which shall herein be claimed as special damages.

Particulars of special damages claimed by the Plaintiffs

- i. Claim compensation sum ----- UGX 130,060,328/= (Uganda Shillings One Thirty Million Sixty Thousand Three Hundred Twenty Shillings)
Proof of payment is marked as Annexure "G"
7. The actions of the Defendants are unlawful, misleading, fraudulent and aimed at not only removing the 1st and 2nd Plaintiffs from the activities of the 3rd Plaintiff in totality, but also a clear ploy by the Defendants to turn the 3rd Plaintiff Organization to their personal aggrandizement, enjoyment and profit whilst utilizing the efforts and resources of the 1st and 2nd Plaintiffs.
8. The Plaintiffs were astonished when the Defendants refused to rectify the illegalities conducted but rather went ahead and started calling sponsors and giving them false and misleading information about the Plaintiffs. (*messages to be adduced during hearing*)
9. The Defendants breached their fiduciary duty to the Plaintiffs while conducting their foresaid activities as directors of the 3rd Plaintiff by conducting themselves in a manner prejudicial to the interests and success of the 3rd Plaintiff.
10. The 1st and 2nd Defendants' actions of registering the school in their names, receiving continuous support for the same from the 1st and 2nd Plaintiffs, using the 3rd Plaintiff's vans and fuel provided for by the 2nd Plaintiff under the guise that the school belonged to the 3rd

- Plaintiff to run school activities and running several projects by the 2nd Defendant on the Lukaya offices amount to unjust enrichment at the expense and detriment of the Plaintiffs.
11. Currently, the activities of the 3rd Plaintiff are on hold as the Defendants have denied the Plaintiffs accountability for the funds extended by the and also denied the Plaintiffs access to vital and important documentation, and have rather resorted to tarnishing the Plaintiffs' names before Sponsors and the locals or residents of Ntungamo where the 3rd Plaintiff operates its activities. *(Termination letter of the relationship between the 1st Plaintiff and 3rd Plaintiff is attached hereto and marked Annexure "Y")*
 12. The actions of the Defendants have clearly established that the 1st and 2nd Plaintiff plus some members/ subscribers of the 3rd Plaintiff cannot continue operating the 3rd Plaintiff Company with the Defendants thus the prayer for dissolution and deregistration of the said Company.
 13. The Plaintiffs instituted criminal proceedings against the Defendants for embezzlement, fraud, forgery and sexual harassment currently undergoing investigations at the Uganda Police Criminal Investigations Department.
 14. The Plaintiff shall contend that a notice of intention to sue was duly served upon the Defendants and the same was ignored.
 15. The cause of action arose in Ntungamo, well within the jurisdiction of this Honourable Court.

WHEREFORE the Plaintiffs pray for the following remedies;

- a) A declaration that the 1st, 2nd, 3rd and 4th Defendants are in breach of their fiduciary duties as directors by acting contrary to the interests of the 3rd Plaintiff
- b) A declaration that the 1st and 2nd Defendants' actions of registering the 3rd Plaintiff's school REVIVAL FAITH PRIMARY SCHOOL in their names amount to fraud.
- c) A declaration that the 1st Defendant's actions of overvaluing the land comprised in **BLOCK 35 PLOTS 1361,1357,1355 and 1358**, in NTUNGAMO District, RWAMPARA at KYAMATE vide Lease hold tenure measuring approximately 2(two) Acres amount to fraud
- d) A declaration that the 1st Defendant's actions of failing to disclose that he was the owner of the land comprised in **BLOCK 35 PLOTS 1361,1357,1355 and 1358**, in NTUNGAMO District, RWAMPARA at KYAMATE vide amount to fraud

- e) A declaration that the 1st Defendant's actions of refusing to effect transfers for the four untitled plots into the names of the 3rd Plaintiff without reasonable cause are fraudulent and unlawful
- f) A declaration that the 1st and 2nd Defendant's actions of amending the company tax identification number details and registering themselves as the only Directors and members of the company with the Uganda Revenue Authority amount to Fraud
- g) An Order directing the 1st and 2nd Defendant to correct the TIN details with Uganda Revenue Authority by submitting the correct details
- h) An order for a permanent injunction restraining the Defendants, their agents, legal representatives or any other person acting under their authority from dealing or transacting on property comprised in **BLOCK 35 PLOTS 1361,1357,1355 and 1358 and the four untitled plots** in NTUNGAMO District, RWAMPARA at KYAMATE in anyway and selling the properties belonging to the 3rd Plaintiff
- i) A declaration that the Defendants actions of removing some subscribers as Directors and members of the 3rd Plaintiff and appointment of unknown individuals as Directors are fraudulent and unlawful.
- j) An Order compelling the Defendants to avail a clear accountability and audited books of account for all the funds received from the 1st and 2nd Plaintiffs for the benefit of the 3rd plaintiff.
- k) An Order for the refund of UGX 11,000,000/= (Uganda Shillings Eleven Million) fraudulently withdrawn from the account of the 3rd Plaintiff by the 1st, 4th and 5th Defendants
- l) An Order for the refund and recovery of all the money received by the 1st, 2nd and 3rd Defendants for the school project from the year 2022-2024
- m) An Order for the dissolution of the 3rd Plaintiff
- n) An Order for the transfer of the assets funded and financed by the 1st and 2nd Plaintiffs to another Non-Governmental Organization
- o) An Order for special damages
- p) An Order for exemplary and aggravated damages to be issued against the Defendants
- q) General Damages
- r) Costs for the suit
- s) Any other relief this Court deems fit

DATED at KAMPALA this 10th day of JULY, 2025



M/S AVIAN ADVOCATES
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