REPUBLIC OF MURIMA

IN THE HIGH COURT OF MURIMA

PETITION NO. E005 OF 2025

IN THE MATTER CONCERNING THE VIOLATION OF HUMAN RIGHTS

BETWEEN

MURIMA HUMAN RIGHTS COMMISSION ……APPLICANT

VERSUS

ATTORNEY GENERAL.....1ST RESPONDENT

CABINET SECRETARY, INFORMATION, COMMUNICATIONS AND THE DIGITAL ECONOMY.....2ND RESPONDENT

CABINET SECRETARY, TREASURY AND NATIONAL PLANNING…….3RD RESPONDENT

INSPECTOR GENERAL OF THE NATIONAL POLICE SERVICE..... 4TH RESPONDENT

1. The Republic of Murima is a sovereign state in the continent of Anguka known for its evolutionary legal system guided by its Constitution promulgated in 2010. It prides itself in being a democratic state where fundamental rights and freedoms are protected and upheld in tandem with the International System of Human Rights. Murima is located on the Eastern side of Anguka Continent, bordered by Kamu to the North, Bara to the South, and Mbuva to the West. It is also a Member of the East Anguka Community which is composed of 7 other states. Its capital city, Buruke is a metropolitan city booming with a vast population of 3 million out of the 60 million people in Murima. Buruke also houses Murima's economic hub.
2. Murima is a Member of the **United Nations** and has ratified most of the human rights treaties in the UN framework. These include; **the International Covenant on Civil and Political Rights (ICCPR), the International Covenant on Economic, Social and Cultural Rights (ICESCR)** and the **Anguka Charter on Human and People's Rights (ACHPR)** together with its protocols, which are analogous to the African Charter, **the East Anguka Community (EPC) Treaty, the Paris Agreement to the United Nations Framework Convention on Climate Change,** and the **Anguka Youth Charter.** It is also a Member of the **International Monetary Fund** and the **World Bank.**
3. Murima, like other states in the Continent of Anguka has affirmed its commitment to addressing the harsh effects of climate change globally, through its Constitution, the Climate Change Act, the Environmental Management and Coordination Act and policy. With a forest cover of 8%, the state has ensured the protection of its forests from deforestation, logging and has also ensured preservation of its water catchment areas. Additionally, the state has invested in urban waste management mechanisms as a means of reducing pollution and preserving the environment. Additionally, Murima's Constitution has enshrined rights and freedoms which address issues of enforced disappearances, torture and extrajudicial killings which plagued the country before its enactment.

4. Murima has an internet penetration rate of 65%, fostering widespread internet usage in the country. The high internet connectivity has facilitated various digital platforms where the Government provides over 1,700 essential services including digitised systems of filing tax returns, health, agriculture and registration of companies. One of the biggest internet and network service providers in the Country is the Zafu Telecommunications Company. In order to subscribe to Zafu, Murimans must agree to a Privacy Statement that includes consent to verify personal data against government databases and permits the sharing of information with regulatory authorities. The widespread connectivity has facilitated social media engagement where platforms like TikTok, X, WhatsApp and Instagram are used for political discussions and social connections.
5. Murima's Gross Domestic Product is 75.3 Billion shillings, with an estimated annual growth of 5.74%. Despite being a lower middle class economy, Murima has enjoyed a long period of economic growth and political stability since its independence. This is attributed to the acquisition of concessional loans from both international and bilateral donors whose financial assistance would be used to finance megaprojects. These would in turn facilitate revenue generation through the growth of infrastructure and creation of employment. The loans would additionally service various sectors in Murima such as health and education. One of Murima's creditors is the International Monetary Fund, an organisation which Murima joined in 1964 as a solution to poverty and inequality which it had been grappling with since it attained self-rule.
6. Despite this economic growth, there have been shocks to the country's economy which have contributed to its GDP decrease. For instance, the emergence of the Wanana-19 Pandemic in 2020, caused the gradual decline of prime sectors such as agriculture and manufacturing greatly reducing their profitability. The formal sector also suffered a large blow with many Murimans losing their jobs. This also

reduced revenue collection thus setting back the State's obligations in servicing a Eurobond loan amounting to approximately two billion shillings.

7. The Muriman economy further dwindled as a result of various natural calamities such as extreme droughts that were being experienced in the Northern parts of the country and raging floods in its Central and Great Rift regions. This was further exacerbated by global oil supply cuts and increased debt service costs on account of inflation and high exchange rates. These high rates limited access to credit and as a result, the country's shilling continued to depreciate against the US Dollar.
8. In the face of these domestic and international shocks, the Government of Murima embarked on economic reforms. President Mtukufu Lais and his Pamoja Murima Administration (hereinafter referred to as PM Administration), were determined to reduce public borrowing which had been a trademark of his predecessor in what came to be known as the 'Jayden effect'. Mtukufu prioritised debt servicing by expanding Murima's tax base allowing for more revenue to be collected. Additionally, due to improved weather conditions and a subsequent recovery of the agricultural sector, the country's GDP grew to 5.5% in 2024. This helped cushion the country against inflation due to the increased commodity prices, especially oil prices.
9. The economic growth was further reinforced by the introduction of the Bottom-Up Economic Transformation Agenda popularly referred to as the BETA. It focused on increasing employment opportunities, equal distribution of income and expansion of the tax revenue base. It also focused on increasing private sector investments and development projects such as the Affordable Housing Programme. It further aimed at strengthening the Murima Shilling to maintain price stability and government intervention in improving food supply and lowering cost of production.
10. Additionally, in the fiscal year 24/25, the Cabinet Secretary for Treasury and Planning, Mr. Kera Bado promised to ensure that BETA worked for every citizen

in the country. The budget was thus unveiled in a highly publicised event where Mr. Kera highlighted the different sectors that the budget accommodated such as improvement of the health sector, protection of the environment and natural resources as a response to the dire effects of climate change, boosting of manufacturing to reduce importation of goods and development of better infrastructure in rural areas. The budget stood at 3.3 Trillion shillings, with a deficit of 346.7 Billion shillings which would be raised through revenue collection.

11. Part of the Murima government's overarching agenda in BETA was the Green Agenda, which aimed to combat environmental degradation and promote sustainable development across various sectors of the economy. Central to this initiative was a commitment to reduce pollution, enhance waste management and mitigate climate change. The Cabinet Secretary for Environment was particularly keen on enforcing these policies, focusing not only on households but also on industries and corporations. The government further targeted industrial polluters, mandating stricter environmental impact assessments and compliance with international environmental standards. While the government championed these policies as necessary steps toward a sustainable future, critics argued that they disproportionately affected low-income families and small businesses, sparking national debate about the balance between economic survival and environmental responsibility.
12. The PM Administration was also committed to upholding transparency, accountability and good governance which are enshrined in Article 10 of Murima's Constitution. As a testament to their commitment, Mtukufu Lais and his Deputy Usiguze Mwene, unveiled the launch of its Open Government Partnership (OGP) Action Plan. This action plan focused on key areas such as public participation, anti-corruption efforts, and access to information, data protection and inclusive governance. During the launch, the President emphasised his vision for leveraging technology for job creation and fostering

inclusivity across all sectors. He added that the country was witnessing the transformative power of digitization in democratising access to government services and information. Through the OGP, the government set guidelines and boundaries on the scope of data being collected by organisations and state corporations with an aim of increasing transparency in how data was collected and used to reassure the privacy of the people in the state which would also curb exploitation of their data. Through digitization of over 1,700 government services, the administration aimed to ensure seamless delivery of public services and foster greater transparency in the management of public resources.

13. The OGP Action Plan also involved providing more access to parliamentary information and the use of technology to conduct civic education and increase civic engagement. This was done through the use of web addresses through which citizens could keep up with legislations at both the national and county levels, thus increasing the level of legislative transparency in the country in compliance with its duty to grant access to information under the Access to Information Act. Reports drafted by various Parliamentary Committees that considered public petitions and memoranda sent by citizens were also uploaded to the website.
14. The PM Administration also catered for marginalised groups in Murima. Through the implementation of the Hasora fund, the government sought to offer capital to unemployed youth and women that would enable them to start businesses and fund their livelihoods. The Hasora Fund was available on digital platforms and could thus be accessed via phone. As a result, 2 million citizens applied for the fund and received it through their mobile banking platforms. Additionally, the government increased the amounts allocated to the Constituencies Development Fund (CDF) and National Government Affirmative Action Fund (NGAAF) to ensure that children who could not afford education were catered for through bursaries. The initiative was successful in disbursing a total of 12 million shillings to 22 million beneficiaries.

15. In the year 2024, the Auditor General's annual fiscal report noted that there were missing funds in the CDF and NGAAF that could not be accounted for. Despite the Government claiming that these funds had reached many beneficiaries, there were increased reports of citizens camping outside the Members of Parliament homes and offices saying that they had been promised that these funds would be disbursed to them. The funds were issued on a first come first serve basis, instead of being granted on application basis. Additionally, there were no records indicating the criteria by which funds were disbursed to people, the amounts issued or how these funds were alternatively put to use by the MPs.
16. While citizens grappled with their MPs' failure to account for the use of the funds, an expose was published in a nationally circulated newspaper called Mambo Taiga, claiming that the funds had been granted to close family members and friends of most of the MPs. Additionally, the funds had been electronically transferred from the County Government accounts to the MPs' personal offshore accounts of MPs. Evidence of these transactions was published in the newspaper as well, with the MPs using pseudonyms to transfer funds.

17. In spite of claims of misappropriated funds, the PM Administration was still committed to improving the economic state of Murima. In an attempt to cover the 2024/2025 budget's deficit, the Finance Bill 2024 was tabled in Parliament, proposing to broaden the tax base through various measures, including increased taxation on digital content and motor vehicles. One of the most debated proposals was the Eco Levy, introduced as part of the government's Green Agenda aimed at reducing micro-pollution and electronic waste (e-waste). The Eco Levy imposed a Ksh150 per kilogram charge on a range of imported plastic and electronic goods, including household essentials like sanitary towels, diapers, cooking oil containers, and electronic devices like smartphones and televisions. The government argued that the levy was critical for addressing Murimas's rapid waste generation, estimated at 22,000 tonnes daily, with a focus

on managing plastic waste, which contributed significantly to environmental degradation. With only 70% of waste collected, the rest often ended up in landfills, exacerbating pollution.

18. The Eco Levy was promoted as a way to fund waste management programs and encourage sustainable practices, particularly in waste collection, recycling, and environmental stewardship. However, the measure faced significant backlash from both the public and manufacturers. Concerns were raised about the socio-economic implications of the levy, particularly its impact on the cost of living for ordinary citizens. For example, the levy would raise the price of a 400-gram loaf of bread by Ksh9, from Ksh65 to Ksh74, and the cost of 1 litre of cooking oil by Ksh16.81, from Ksh300 to Ksh316.81. Similarly, a 1 kilogram package of laundry detergent would increase in price by Ksh30, from Ksh200 to Ksh230, adding to the financial strain on households already grappling with inflation and other rising costs under the Finance Bill 2024.

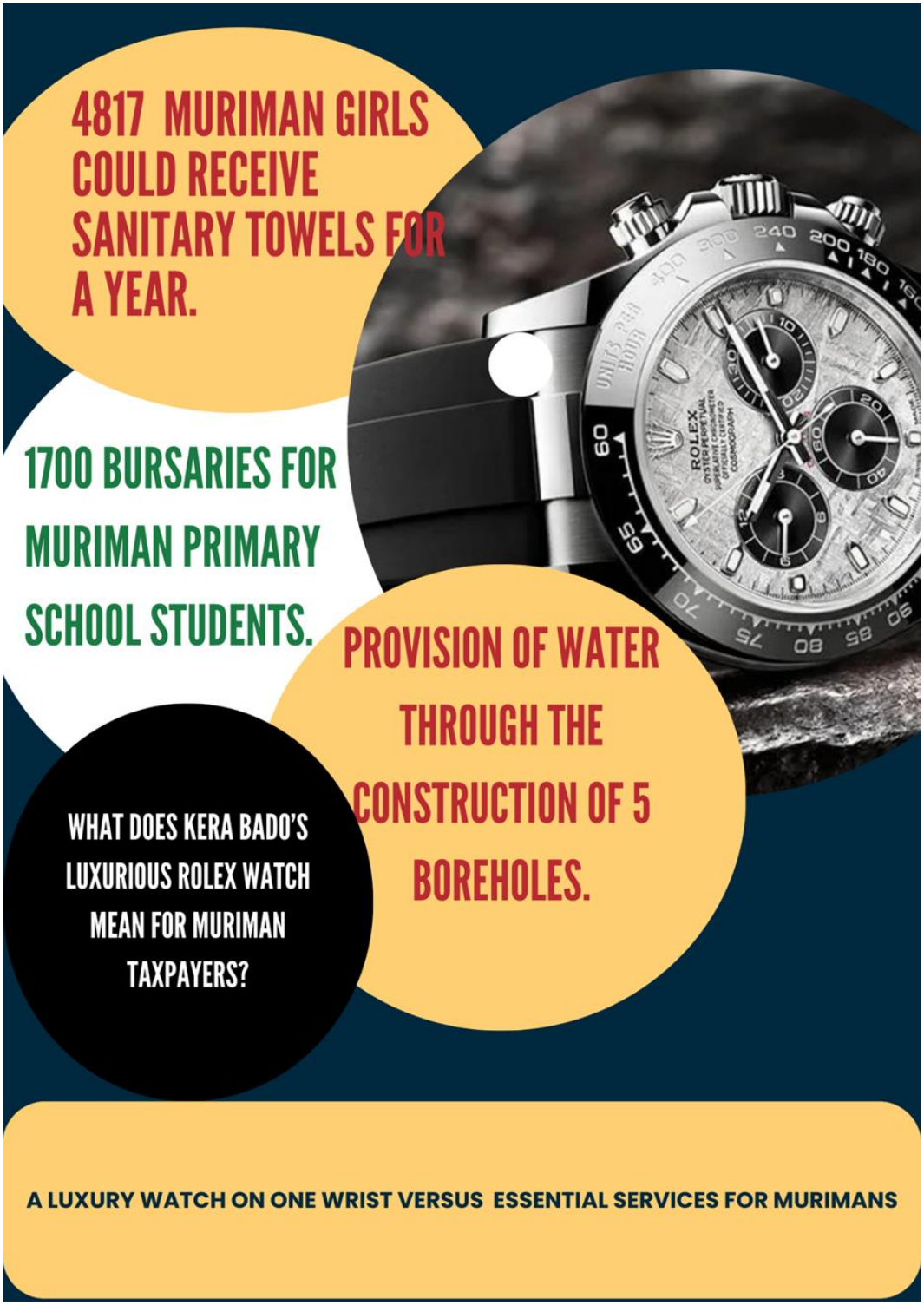
19. Manufacturers also warned that the Eco Levy would lead to higher production costs, which could affect product pricing and disrupt supply chains, especially for industries heavily reliant on plastic packaging. Companies like KAKA KALA Bottlers voiced concerns that the increased cost of goods would hurt low-income households and lead to long-term job losses in plastic-reliant industries. Furthermore, they pointed out that the higher costs for sanitary products, like sanitary pads, could exacerbate existing socio-economic inequalities, particularly for school-going girls, many of whom already miss school due to the unaffordability of menstrual products.

20. The government argued that the levy would incentivize innovation in sustainable packaging, encouraging companies to adopt eco-friendly materials that could enhance their competitiveness in a market that is increasingly conscious of environmental sustainability. Additionally, manufacturers could

collaborate with waste management companies to invest in recycling infrastructure, promoting a circular economy that would reduce waste and create new economic opportunities. These investments could also boost brand reputation, as consumers increasingly prioritise environmentally responsible businesses. The Principal Secretary for the Environment defended the Eco Levy at public fora, emphasising that it was not merely a tax but a strategic policy necessary to balance environmental sustainability with economic realities.

21. The debate surrounding the Eco Levy intensified, coinciding with a devastating period of heavy rains and flash floods that swept across Murima in March, April and May. The National Disaster Operations Centre (NDOC) reported that as of late April, over 150,000 people were displaced, 103 people killed, 21 missing and nearly 191,000 individuals affected by floods. The disaster also wreaked havoc on livestock, croplands, businesses and educational institutions, with a dam burst in Maji Moto region, resulting in further fatalities. These calamities sparked heated debates on X (formerly Twitter) regarding the government's accountability in mitigating the effects of climate change and its disaster response mechanisms. Critics highlighted the government's failure to implement timely mitigation measures, despite warnings from the Murima Meteorological Department as early as July 2023 about the intensifying El Niño weather patterns.
22. The Murima Human Rights Commission (MHRC) filed a lawsuit against various government officials and entities before the Environment and Land Court, accusing them of negligence in managing the flood disaster. The MHRC demanded compensation for flood victims, citing the government's failure to protect citizens from preventable harm, and called for urgent reforms to disaster preparedness and response systems. The eviction of residents in the Mukuru Kwa Reuben and Kwa Njenga slums during the floods further increased public anger, with accusations that the government exacerbated the crisis by displacing already vulnerable populations.

23. Aside from the Eco Levy, the Finance Bill 2024 also granted the Murima Revenue Authority (MRA) expanded powers to access financial records, targeting both individuals and businesses to improve tax collection. This included the right to examine financial transactions without prior consent, particularly aimed at reducing tax evasion and enforcing compliance, especially in the informal sector and the digital economy. The Bill also amended Section 51 of the Data Protection Act, exempting the MRA from certain data protection provisions when processing personal data for tax purposes, a move that sparked privacy concerns. Despite the criticism, the government defended these changes as necessary for addressing the country's growing debt, which had reached 71% of its GDP by 2025.
24. However, an article published online on a popular website known as Pulse Murima, revealed that the harsh economic policies that the Bill advocated for were a result of austerity measures proposed by the IMF with a view to cutting back on Government expenditure and raising additional revenue to pay off IMF loans. This led to public uproar as it was also claimed in the article that the Bill cushioned high ranking Government officials against its effects by significantly increasing their salaries. This increased the tension between ordinary citizens and those governing them, especially when political leaders began to flaunt their lavish lifestyles online. Proactive citizens on social media highlighted the gap between the political elite and ordinary citizens by making posters that compared the political class' luxurious items to the ordinary citizen's expenditure as illustrated below by ***Fig. 1.1***



25. On the flipside, some citizens maintained trust in the PM administration and put the online article's veracity into question especially since the Government had not responded to the accusations contained therein. They especially felt assured by the PM Administration's promises that the Bill was geared towards

improving the livelihoods of Murimans and reducing the public debt. In a speech made by Mtukufu Lais on 5th June 2024, he stated that *"**The Finance Bill is meant to salvage the dire situation in the country and take it back from our creditors. We are merely rectifying the mistakes of our predecessors and taking control of our macroeconomy.**"* As such his supporters took to X to defend his administration.



26. The Finance Bill, 2024 then underwent its first reading on 13th May, 2024 after which the Finance and National Planning Committee undertook public participation. The Committee placed adverts in print media including the local newspaper, Murima Daily, on 15th May, inviting the public and relevant stakeholders to submit their views on the Bill. As a result the Committee received 203 memoranda from stakeholders and 401 online submissions through the Parliament email. The Committee then drafted a report at the close of the public participation exercise where it highlighted the views it had collected and how such views had been considered. For instance, it agreed with a stakeholder memoranda suggesting the deletion of clauses that proposed the increment of the tax payable on online money transfers from 15% to 20%.
27. The implications of the proposed Bill on the cost of living led to a wide civilian led social media campaign dubbed #RejectFinanceBill2024. The campaign involved educating the public on the implications of the Bill on an X Space as well as TikTok Live. A simplified version of the Bill was also created by citizens

through the use of Artificial Intelligence Tools to help educate the public more on its implications. This was dubbed Finance Bill GPT and was a less technical version of the Bill. The Bill was also transcribed through this AI technology into local languages to accommodate those who were not conversant with English and Swahili which were the official languages in Murima. The campaign reached its peak at the Bill's public participation phase where an online petition to reject the Bill was launched. The petition collected 124,000 signatures.

28. However, despite the movement seeking to reject the Bill, through rushed proceedings in Parliament, the Bill was passed into law by a majority vote. This information was then leaked to the public which caused further uproar. To demonstrate their displeasure with the contentious provisions within the Act, a protest was organised, with most of the mobilisation happening online on X. The protests were to be held in Buruke's Central Business District and the relevant Officer Commanding Station was issued with one week's notice. As such police officers were dispatched on the day of the protests to provide security. The protests mostly consisted of the youth who had shown up in large numbers. They marched within the CBD, carrying small Muriman flags, placards, whistles and bottles of water. They also sang songs and made chants signifying their displeasure with the proposed taxes.
29. Although the protests began peacefully, a number of protesters engaged in a violent confrontation with the police in which they began to throw stones at the police. In response, the police used teargas canisters, water cannons and live bullets to disperse the protesters. In the chaos that erupted, one of the protesters, Mwana Madredi, was shot and fatally wounded. A policeman and 35 protesters were injured.
30. A few days later after the protests, during a public Baraza held by the Murima First Movement, a Member of Parliament addressed the public on the positive implications of the Finance Bill 2024 such as reducing Murima's public debt and collecting revenue that the Government would use in making its development

agenda come into fruition. The MP, also mocked the youth protests, claiming that the youth had a narrow understanding of the Finance Bill. He further claimed that they did not understand the hardships faced by common citizens since they were of a higher economic status. Following these sentiments, his phone number was leaked on X. He then received insulting messages from hundreds of people who were displeased with the comments he made during the Baraza. The incident was part of a string of occurrences where Politicians' contacts and personal information was leaked to the public under the hashtag **#SalimiaMheshimiwa** by a notorious hacker named Incognito. In one incident, the daughter of an MP was attacked in her university hostel after her personal information was revealed on X.

31. In response to Mwana Madredi's death, the youth declared a 7 day campaign in his honour. The campaign's agenda included demanding accountability for Mwana Madredi's death from IPOA as well as a march to Parliament to confront Members of Parliament who had voted "Yes" to the Bill which had subsequently been approved for its second reading. The march to Parliament was dubbed **#OccupyParliament** and was to take place on the 25th of June, 2024. As opposed to the previous protest, it was not clear who the organisers of the **#OccupyParliament** protests were. However, online mobilisation was still occuring on social media spaces with an aim of getting one million people to march to Parliament.
32. A few individuals with large followings on social media were responsible for amplifying the March and encouraging Murimans to attend. Murimans responded enthusiastically to the proposal of demanding accountability from their elected Parliamentary representatives. However, a few expressed their intention to engage in a violent confrontation with their representatives in their pursuit of accountability. As a result, Murima's Intelligence Unit advised officers to stay vigilant on the day of the march since there was a high risk of violence ensuing. Furthermore, the Intelligence Unit arrested the key mobilisers of the

march on the morning of the intended protests with the hope that this would prevent what they termed a security risk from occurring.



33. On the same morning, the Police placed road blocks on the main entry points into the Central Business District. This prevented vehicles, especially those carrying protesters from entering the CBD. However, protesters alighted and continued on foot to Parliament. As the march reached its climax with thousands of assembled protesters approaching the entry to Parliament carrying placards and flags, the police began to engage by throwing teargas at the protesters. One canister landed on a protester's head, blowing it into bits. The protesters remained determined and attempted to breach the Parliament gates and gain entry. At this point, a live bullet was fired by a sniper from a building close to Parliament and it lodged into a protester's head killing him on the spot. The protesters who were now charged breached all of Parliament's entry points and made their way into the building. Members of Parliament who were in the building fled the premises. The Protesters set the building on fire and those who had gained entry left with the mace. Two members of Parliament had been caught by the protesters and were thoroughly beaten and kicked. One of them was later admitted to the Intensive Care Unit.
34. News of the successful entry into Parliament had spread to other counties, where smaller groups had assembled to protest against the consideration of the Finance

Bill, 2024. The groups reacted by bursting into the homes and business premises of their respective Members of Parliament. They engaged in destruction of property, vandalism and stealing. In one county, a night club belonging to a Member of Parliament was broken into and goods worth 6 million shillings were stolen. To further aggravate the situation, the building was torched as protesters continued to chant their displeasure with their government.

35. At this point, the entire CBD erupted into chaos with Police officers shooting live bullets to disperse the protesters. The media who had been covering the protests thus far reported that they had received threats not to cover the protests any further. A few reporters on the ground had been subjected to violence in the hands of police officers as teargas and live bullets were repeatedly fired in their direction. When they failed to disperse, officers hit them with batons and broke a few cameras in the process. To add insult to injury, a female journalist who tried to escape from the police's clutches was shot in her thigh. In response to the chaos, a State Press Conference was scheduled for that night where the Head of State would address the nation. During the conference, the Head of State deployed the Murima Defence Forces claiming that the protests had been infiltrated by organised criminals.
36. From around 7:00 PM to 11.30 PM, while protesters were heading to their homes there was an Internet and Mainstream media shutdown with only one state owned TV station remaining to broadcast the State press conference. When the internet connectivity was restored, citizens took to social media to express their outrage at the failure by the Head of State to condemn the excessive use of force by the police on protesters and the excessive measure of deploying the army. A new hashtag of #**OccupyStateHouse** emerged to urge civilians to march to State house and demand the resignation of their president who had failed to address their demands. A petition was then lodged in the High Court of Murima seeking a declaration that the deployment of the army was unconstitutional.

37. On the day of the march to the State house, the streets were filled with members of the armed forces. Murimans were reluctant to participate in the march to State house due to the heavy army presence within the CBD which was meant to serve as the mobilisation point. A few youths who had played a central role in mobilising protesters online for the #OccupyParliament march had urged people to remain home as a safety precaution. As a result the march did not take place. However, in the days that followed Mtukufu Lais offered to engage with Murimans on X space in a bid to listen to and address their grievances. The space had over 100,000 participants and was hosted by Sultani, a member of the youth who had been instrumental in mobilising people for the OccupyParliament march but dissuaded them from participating in the OccupyStatehouse march. The host worked in collaboration with the Government spokesman to ensure that participants had a chance to air their views. A few action points arose from the online engagement with Mtukufu Lais promising to reconstitute his Cabinet which had been termed as incompetent and to abolish the offices of the First Lady and Deputy First Lady which had been termed as unnecessary and wasteful.
38. Within the next month, Mtukufu Lais had reconstituted his Cabinet. However, one of the fresh candidates who occupied the position of Cabinet Secretary had been dismissed by the previous regime on grounds of corruption, embezzlement and incompetence. The specific report stated that a total of 3.5 Billion Shillings had been unaccounted for when he ran the State Department for Mining. Despite this the National Assembly approved his appointment. Mtukufu also suspended the offices of First Lady and Deputy First Lady. In addition, he had declined to sign the controversial Finance Bill into law and instead had sent it back to Parliament recommending that the contentious provisions be reconsidered.
39. Meanwhile in Parliament, a new Bill, the Assembly and Demonstrations Bill, had been introduced and had undergone its First Reading. The Bill aimed at providing a comprehensive legal framework for the exercise of the Freedom of Assembly. Under the Bill, protesters would be held jointly liable for any damage

to property occurring during a protest. Furthermore, they would be prohibited from wearing masks while protesting and would be held liable for carrying placards, singing, chanting or uttering words that could be interpreted as inciting violence against certain people. The Bill would also empower police officers to prohibit protests which could only be reversed by the High Court. Calls for public participation were spearheaded by Patriotwatch, a civic organisation that explained the implications of the Bill on the right to assemble. The organisation directed Murimans to express any views or concerns via the parliamentary email.

40. A month later, reports of missing people began to flood social media spaces. In some instances, people were picked up by unidentified individuals in unmarked vehicles. In other instances, people disappeared from their homes or places of work without a trace. Some of the individuals would be found in police cells, tea plantations, river beds and other inconspicuous areas. It was rumoured through information shared by bloggers via X, that the mysterious disappearances occurring in the hands of unidentified police officers was being facilitated by information acquired from Zafu. According to these rumours, Zafu was providing personal data about the protesters who breached Parliament on 25th June 2024, especially those who had posted pictures and videos of themselves in Parliament. In addition, it was believed that Zafu and the Government had orchestrated the internet shutdown on 25th June 2024, when a number of Muriman protesters were allegedly executed.

41. An example was Deni, who had last been seen near his university campus. He was in the company of individuals who forced him into an unmarked vehicle. Posters of his disappearance were made and distributed online. It was believed that he was in the custody of police officers who had taken a few other individuals in a similar manner in the preceding weeks but had released them. An individual on X posted that Deni's disappearance must have been connected to the Occupy Parliament march during which he had posted a video of himself within the Parliament Premises. After a 3 week search, Deni's body was

discovered floating in a quarry. An autopsy done by a government pathologist revealed that he had been unconscious when he was put into the water and that he drowned afterwards. The report also showed that he died as a result of blunt force trauma due to being hit by a blunt object several times on his head. His death left both his family and fellow university students devastated.

42. Murima Human Rights Watchdogs, an independent organisation, had prepared a report on the aftermath of the protests. The report stated that there had been 230 deaths during the protests. Specifically, 100 had succumbed to bullet wounds, 39 had succumbed to bludgeoning using police batons, 91 had suffocated from inhaling teargas fumes in enclosed areas, 5 of whom were primary school students, and 121 were still receiving treatment for injuries sustained during the protests. The report further disclosed that the Independent Policing Oversight Authority was yet to take action against any police officer for excessive use of force.
43. In response to the heinous accusations, Zafu released an official statement on X. They completely denied orchestrating the internet shutdown especially since Zafu had been experiencing connectivity problems the entire year. On the day in question, they claimed that one of their undersea internet cables had malfunctioned thus resulting in the cut of the internet supply. In response to the claim that they had revealed Murimans' information to the government, they stated that they were required to surrender personal information where it was necessary to do so under Law in light of national security concerns.
44. Following massive complaints nationwide brought against the government by the People and other civil society organisations in the country, the Murima Human Rights Commission filed a case before the High Court of Murima on 11th March, 2025 seeking adjudication over the following matters:

a. **Whether the Eco Levy strikes a justifiable balance between the government's environmental objectives and the socio-economic rights of the people of Murima,**
b. **Whether the Government violated the principles of Public Finance under Article 201 of the Constitution of Kenya through the Finance Act 2024,**
c. **Whether the government adhered to the Constitution and data protection regulations and violated the citizens' right to privacy,**
d. **Whether the police violated their Constitutional and International Human Rights Obligations through the abductions and extrajudicial killings in Murima during the protests.**

TAKE NOTICE;

1. **All Laws in the Republic of Murima are analogous to the Laws of Kenya.**
2. **All Laws in Anguka and East Anguka Continent are analogous to the Laws of Africa and East Africa.**
3. **You are required to prepare cogent submissions for both the petitioner and the respondents addressing the issues of jurisdiction and admissibility.**