REPUBLIC OF MAMBOLEO

IN THE HIGH COURT OF MAMBOLEO

PETITION NO. E077, E078 & E079 OF 2026 (CONSOLIDATED)

IN THE MATTER OF THE VIOLATION OF HUMAN RIGHTS

BETWEEN

FICHUA SOCIETY ..... 1ST APPLICANT

ANGAZA SOCIETY .....2ND APPLICANT

SISI KWA SISI SOCIETY .....3RD APPLICANT

—AND—

THE ATTORNEY GENERAL ..... 1ST RESPONDENT

CABINET SECRETARY, TREASURY AND NATIONAL PLANNING .....2ND RESPONDENT

CABINET SECRETARY, MINISTRY OF HEALTH ..... 3RD RESPONDENT

CABINET SECRETARY, MINISTRY OF ENVIRONMENT, CLIMATE CHANGE AND FORESTRY ..... 4TH RESPONDENT

1. The Republic of Mamboleo is a democratic state in the Continent of Chapakazi. It exhibits a midrange performance across the four categories of the global state of democracy framework and is considered a democratic hub within the continent. This reputation stems from the promulgation of the Country's 2010 transformative Constitution that ushered in a new era of institutional reforms, accountability, and entrenchment of the Bill of Rights. Mamboleo is located on the Eastern side of the Chapakazi continent, bordered by Wantamu to the North, Kaongo in the South, and Hisia to the West. The Capital, Mavukeni, is often referred to as the Silicon Savannah, due to its vibrant tech ecosystems driven by the young population, high mobile and internet penetration, and significant strides in using Artificial Intelligence (AI) to create jobs and solve local challenges. Sauti Telecommunications PLC is the leading telecommunications company and internet provider in the Country.

2. Mamboleo is a member of the United Nations, the Chapakazi and East Chapakazi regional trading bloc, maintaining amicable relations with neighbouring countries. It has also affirmed its commitment to various international instruments, including the International Covenant on Civil and Political Rights (ICCPR), the International Covenant on Economic, Social and Cultural Rights (ICESCR), and the Chapakazi Charter on Human and People's Rights (MCHPR) alongside its subsequent protocols, such as the Protocol to the Chapakazi Charter on the Establishment of the Chapakazi Court on Human and Peoples' Rights, the East Chapakazi Community (ECC) Treaty, and the ECC Monetary Union Protocol. Further, Mamboleo participates in international meetings organised by the Organisation for Economic

Cooperation and Development (OECD), Chapakazi Tax Administration Forum and East Chapakazi Revenue Authority Technical Committee.

3. Today, Mamboleo is one of the region's economic powerhouses. With a population of just over fifty million people and a nominal GDP of **approximately 17.16 trillion** Mamboleoan shillings (Msh)**,** it ranks as one of the largest economies in sub-Saharan Chapakazi and in recent years, its growth has averaged between 4 and 5% of its GDP annually. This pace has attracted favourable reviews from some international lenders and credit-rating agencies who have revised Mamboleo's debt outlook to "positive" from "negative" citing potential ease in liquidity risks and improving debt affordability over time. International institutions such as the World Bank have projected the country to remain on a solid growth trajectory well into the latter half of this decade.

4. This reputation, however, came at a cost. Before the promulgation of the Constitution, Mamboleo's fiscal framework was dominated by centralisation and a lack of transparency. The decision on revenue allocation was concentrated in the executive with little parliamentary oversight and no channels for citizen input. Indeed, reports and historical analyses suggest that public funds were often perceived to be distributed along political lines, with wealthier and politically connected regions such as Southland Mamboleo and the Coastal region enjoying disproportionate investments in roads, schools, and healthcare. Meanwhile, vast regions in the Northern Drylands, the Eastern Highlands and the Lake Basin region were left largely underdeveloped. Debt contracting was done behind closed doors, and information on public finances was scarce. The result was a system where most citizens felt excluded from the benefits of national wealth, even as the burden of debt repayment fell squarely on them.

5. Similarly, with regard to law enforcement, Mamboleo's policing was widely condemned for its culture of impunity, excessive use of force and overt political manipulation. Security agencies were perceived to operate as instruments of state power, leading to widespread allegations of suppression of opposition voices. High-profile abuses, ranging from extrajudicial killings to violent crackdowns on peaceful assemblies and political dissent, underscored a law enforcement system untethered from constitutional or human rights standards. Civilian oversight mechanisms were ineffective and easily circumvented. Within the ranks, impunity was the norm; senior officers, in particular, were shielded from scrutiny, rarely if ever facing consequences for abuses committed under their command. This system led to a complete breakdown of the constitutional state. The law was therefore replaced with roadside declarations. This led to a fight and struggle for a new Constitution to re-establish this constitutional state.

6. The promulgation of the 2010 Constitution marked a turning point. The new Constitution was hailed across the region as one of Chapakazi's most democratic and progressive constitutions. It sought to transform fiscal governance by entrenching transparency, accountability, equity, and public participation principles. It created structures to ensure equitable sharing of resources between the national and county levels, mandated development expenditure of at least 30% of revenue, and strengthened independent offices such as the Auditor-General to safeguard oversight. These reforms inspired confidence domestically and internationally, with Mamboleo earning a reputation as a country committed to fiscal sustainability and democratic accountability. For a time, the new framework offered real hope, resources equitably distributed, that borrowing would be disciplined, and wastage curtailed.

7. The Constitution also rebranded the police from a force to a service which embedded accountability under Articles 238 and 244. It also established civilian

oversight through the Office of Civilian Oversight and Justice (OCOJ) and the Mamboleo Police Integrity Commission (MPIC) while guaranteeing fundamental rights under the Bill of Rights. These reforms promised professionalism, transparency, and policing grounded in respect for human dignity. As a result of these democratic reforms, Mamboleo has been hailed internationally for its efforts in professionalising policing and aligning its security sector with global human rights standards. Successive administrations have affirmed that police reform is not only a governance priority but also a constitutional obligation under the 2010 Constitution of Mamboleo.

8. But beneath this reputation of progress, the country struggles with its past. Before the promulgation of the 2010 Constitution, unchecked State power enabled and facilitated widespread violations of human rights, including: arbitrary arrests, restriction on media freedom, gender inequality, and political persecutions. The 2010 Constitution was therefore celebrated as a beacon of hope that promised constitutionalism, the rule of law, and good governance. Its promulgation was not merely a legal event, it was a national rebirth. On that August morning, the Mavukeni National Stadium overflowed with citizens draped in the colours of the flag, their voices rising in songs as the new Constitution was unveiled. In that moment, the Constitution was not just unveiled, it was consecrated in the collective spirit of a people determined to never return to the shadows of impunity and exclusion. Yet 15 years later, the promise that once electrified the nation has not fully matured and the implementation of this Constitution has fallen short of the vision its framers so boldly set forth.

9. The constitutional optimism has diminished. Mounting debt obligations now stands at MSh 11.81 trillion, which translates to nearly seventy percent of Mamboleo's MSh 17.16 trillion GDP, leaving little space for meaningful social investment. Even though health, education, and infrastructure appear to receive the largest shares of the national budget, these allocations are drawn

from an already depleted treasury. After debt servicing consumes nearly seventy per cent of total revenue, barely thirty per cent remains for all other expenditures. From this remainder, education takes roughly sixteen per cent, health just under four per cent, and infrastructure about twelve per cent, leaving little for social protection, agriculture, and county transfers. The result is a fiscal scramble in which essential sectors compete for the little that is left, often surviving on delayed disbursements and partial funding.

10. Projects are left incomplete, yet debt remains binding, and must be repaid from taxes of ordinary citizens who continue to face the shortages the loans were meant to cure. Audits have highlighted stalled developments such as the Makuta and Itari Dams, the Kawere County Teaching and Referral Hospital, and the East Chapakazi Renal Institute, all multi-billion-shilling projects abandoned midway despite heavy disbursements. The fiscal landscape has narrowed into a precarious balancing act where every shilling counts, and the country can no longer afford any wastage. The constitutional promise of fiscal sustainability, once a source of national pride, now appears fragile in the face of growing debt pressures and weakening oversight.

11. Beyond its seemingly democratic progress, Mamboleo has been hailed internationally for its pro-climate agenda. From hosting the inaugural Chapakazi Climate Summit in 2023 to spearheading ambitious commitments under its Nationally Determined Contributions. President Mtemi has repeatedly affirmed that climate action is not only an environmental responsibility but also a moral duty. He has repeatedly pledged that Mamboleo will serve as a model for balancing development with environmental protection at the global stage. In pursuit of this ambition, Mamboleo entered into an agreement with an International Climate Organisation (IO) and granted the IO, immunities, including protection from lawsuits, taxation, and domestic oversight. This was celebrated internationally as a sign of investor confidence. This arrangement has drawn criticism from civil society, who argue that such

immunities shield powerful actors from accountability, especially in forced evictions and environmental degradation cases.

12. In a bid to demonstrate its commitment to the climate change mitigation and sustainability agenda, the Government of Mamboleo unveiled the **Chapakazi Arid Lands Adaptation and Carbon Project (CALACP)** as a flagship initiative under its partnership with the International Climate Organisation (ICO). The project was introduced as a comprehensive climate mitigation and land restoration programme aimed at enhancing carbon sequestration and promoting sustainable land use in arid and semi-arid regions. Prior to the project's launch, an Environmental Impact Assessment (EIA) was undertaken and completed within a week. The Project proponents explained that the expedited process was necessary given the urgency posed by the effects of climate change, including recurrent droughts, declining pasture, and rising food insecurity in the affected regions. They maintained that the fast-tracked implementation was essential to conserve the environment.

13. In February 2025, a consultative meeting was held in a nearby town to engage representatives from local pastoralist communities and other stakeholders. The meeting was attended by three stakeholders, including two community elders and a representative from a local conservancy. During the session, the project team outlined the anticipated benefits, including the introduction of modern grazing systems, improved access to water through borehole development, and potential annual stipends once carbon credits were sold. Based on these assurances, the stakeholders present adopted the initiative unanimously, expressing optimism that it would promote environmental restoration. The minutes of the meeting were subsequently included in the official project documentation as evidence of community consultation and stakeholder participation.

14. By March 2025, the CALACP was officially launched across Mamboleo's arid and semi-arid regions, covering approximately two million hectares of communal rangelands. The project sought to restore degraded ecosystems through rotational grazing, soil regeneration, and tree planting, while also generating carbon offsets for sale on international markets. According to official projections, the initiative was expected to remove significant amounts of carbon dioxide over the next three decades, improve grazing conditions, and create new income opportunities for local conservancies and participating communities.

15. Shortly after implementation, reports from civil society organisations and environmental monitoring groups presented differing assessments of CALACP's early impact. Some studies observed positive ecological indicators, including improved vegetation cover and reduced soil erosion, while others pointed to areas where grazing restrictions and fencing had disrupted traditional land use practices. Questions were also raised about the depth of public participation and the adequacy of environmental monitoring mechanisms established under the project.

16. It was against this backdrop that President Mtemi convened one of his routine quarterly press briefings. In his address, he highlighted what he saw as the hallmarks of his administration's progress, pointing first to Mamboleo's fiscal record. He accredited the country's improved debt repayment performance by drawing on reports from international lenders and the Ministry of Treasury and National Planning, noting that Mamboleo had serviced approximately MSh 1.7 trillion in debt obligations during the last financial year which is equivalent to about 15% of its total public debt stock of MSh 11.8 trillion. He pointed to National Treasury's 2025 Fiscal Outlook Report that placed Mamboleo among the most fiscally stable states in the region. "*Our discipline in managing debt,"* he said, "*is proof that we are holding the end of the bargain with our partners, while never losing sight of our duty to the people".* He contrasted this with

what he describes as years of laxity and mismanagement under his predecessors, insisting that his administration had reversed a culture of waste and brought accountability into the heart of government.

17. On his reforms, he pointed to his government's prioritisation of social economic rights despite debt obligations and justified this by noting the increased allocations to education by 1.3% and health 0.1% in the current fiscal year. While acknowledging the persistent gaps in service delivery, he insisted that these were legacies of the old Taifa Health Insurance Fund, a system that he described as having failed the people with delays, mismanagement of funds and exclusions. His administration, he declared, had broken from that past through the newly formed Mawanachi Health Insurance Fund, which he described as a fresh commitment to accessible healthcare and a cure to the weaknesses of the Taifa Health Insurance Fund. '*We are not perfect,"* he admitted, "*but we are building a system that works and those who benefit from chaos would rather see it collapse."*

18. President Mtemi then shifted his focus to what he described as Mamboleo's "technological revival." Praising the country's recognition as the "Silicon Savannah," he cited a recent report by the Mawasiliano Authority showing that mobile subscriptions had surged by 68 per cent from the previous year, pushing penetration rates to an unprecedented 145.3 per cent, with smartphone usage standing at 80 per cent. In response to this exponential growth, he announced that his administration was introducing a metered billing system for internet users, tied to mandatory identity verification. Under the proposal, every user would be assigned a unique internet number, and data from the system would be submitted to the Mawasiliano Authority. Framing it as a matter of national interest, he justified the measure as essential for orderly growth, improved efficiency, and alignment of communications infrastructure with Mamboleo's socio-economic, cultural, and security needs. He revealed plans for a Universal Service Fund designed to expand access to ICT services,

particularly in underserved and marginalised areas to crown this technological vision.

19. The President rounded off his briefing by pointing to what he described as the human face of his administration's agenda. He reiterated his government's "zero-tolerance" policy against extrajudicial killings and arbitrary arrests, commended the empowerment of youth through programs such as the Hazina Fund, a cheaper lending programme for the youth, and affirmed his commitment to inclusivity, prioritising the people and the promotion of rights. Concluding on a triumphant note, he pledged that his regime would continue to uphold the Constitution in both spirit and letter, assuring citizens that the nation was on a trajectory of growth, stability, and constitutional fidelity. At the end, he noted that he would not allow any evil forces to topple the government. He declared that *"Tuko tayari kutoa madoadoa. Serikali iko imara na ukileta nyef nyef utajua sisi ni nani. The police have my full support to deal decisively with any cockroaches."*

20. Following the President's address, independent institutions released reports contradicting his progress claims. The Mwangaza Commission on Rights, the country's recognised National Human Rights Institution (NHRI), painted a very different picture of Mamboleo's governance through its annual report. According to the report, there were concerns over alleged failures in upholding fundamental rights, including reports of extrajudicial killings, unlawful arrests, and intimidation of civil society groups. It further highlighted the government's neglect of fiscal responsibilities, pointing to widespread mismanagement of public resources and a lack of accountability in key ministries such as health and education. While the President had cited increased allocations to education and healthcare as proof of social investment, the report observed that these funds were often misapplied or lost through corruption, leaving the most vulnerable citizens without essential services.

21. In response to NHRI's report, The Treasury, and the Ministry of Health, however, consistently maintained that the apparent shortfalls in service delivery were not a result of deliberate neglect or corruption but rather of global economic shocks, currency fluctuations, and debt restructuring demands beyond Mamboleo's control. In fact, the Minister for treasury was quoted saying in a Television interview that fiscal prudence requires prioritising debt repayment to safeguard the country's creditworthiness, which is in turn essential to sustaining long-term investment in public services.

22. *Amkeni*, another watchdog institution, echoed these concerns in its findings, specifically on media freedom. Its report described a growing culture of censorship and harassment, with journalists facing arbitrary arrests, newsrooms raided, and media outlets threatened with shutdowns whenever they exposed corruption or human rights violations. The government, however, maintained that such interventions were undertaken within the confines of the law citing them as necessary measures to regulate ethical journalism, prevent the spread of false information, and safeguard public order.

23. A significant part of Amkeni's report zeroed in on the administration's ambitious telecommunication agenda, which President Mtemi earlier celebrated in his speech. According to Amkeni, the reforms were being pushed through two draft bills framed as tools for consumer protection. Still, they contained provisions that, in practice, expanded digital surveillance. One of the proposals would compel telecommunications operators to register every SIM card with extensive personal details, including name, ID number, date of birth, gender, and both physical and postal addresses. While the bills mandated that such data be stored confidentially, the confidentiality could be lifted at the request of the government or relevant state organs.

24. Amkeni questioned the broad and undefined scope of these "relevant state organs," warning that such language effectively legalised unrestricted access to private subscriber information under the guise of national interest. In their analysis, this was not merely about streamlining consumer protection, but about laying the legal foundation for systematic surveillance of citizens, particularly those who used digital platforms to hold the state accountable. Coupled with the already hostile environment facing investigative journalism, the watchdog concluded, these developments represented a profound threat to privacy and media freedom in Mamboleo.

25. The reports sparked outrage on social media, where citizens quickly took to digital platforms to question the government's narrative and expose the growing disconnect between official statements and lived realities. Young people, in particular, used online platforms to highlight the government's failures and call out gaps in service delivery. A central point of grievance was the Mwananchi Insurance Fund, which the President had showcased as a reform, but many saw as deeply problematic. Users compared it to the old Taifa Insurance scheme, pointing out that both suffered from the same weaknesses: poor management, delayed reimbursements, and bureaucratic hurdles. Their frustration was amplified by the revelation of the grassroots collective of nurses and activists who, through the **Mamboleo Master Facility Health Registry (MMFHR)**, began tracing suspicious entries and unmasking hundreds of ghost hospitals drawing funds from the Mwananchi Insurance Fund. Screenshots circulated of how some of these non-existent facilities had received disbursements worth hundreds of millions, while legitimate county and private hospitals struggled to stay open. Estimates suggested that the new fund had already bled MSh 20 billion through fraudulent claims, even as genuine hospitals bore the brunt of underfunding.



26. This comes after a report indicating that despite significant public borrowing to operationalise the Mwananchi Health Fund from the former Taifa Health Initiative, access to healthcare for ordinary citizens remains severely constrained. The report indicates that beneficiaries frequently struggle to obtain approval for medical procedures or reimbursement for treatment costs, with many public hospitals declining to honour Mwananchi cards due to delayed remittances from the Fund. The situation has been compounded by revelations of ghost hospitals listed as service providers, drawing allocations from an already overstretched health budget.

27. Alarmed by the mounting public scrutiny, the MMFHR public portal was shut down, blocking further citizen-led tracking of irregular facilities. This intensified the backlash as parliamentarians joined citizens in demanding accountability, while activists accused the government of silencing transparency. In a defensive press statement, the Minister of Health denied any prior knowledge of the ghost hospitals receiving public funds, stating that his ministry had already initiated investigations into the matter and the investigations had now led to the freezing of disbursements MSh 10.6 billion. Still, in a retaliatory twist, he alleged that several of the legislators demanding his resignation were themselves owners of the ghost hospitals. The revelation deepened the outrage and cemented the perception that management of public finances was marred by incompetence and collusion at the highest levels.

28. Critics argued that this was a failure of financial accountability and a direct violation of the constitutional right to health, as citizens continued to pay into a system that failed to provide reliable healthcare. The debate intensified as activists, journalists, and ordinary citizens began to use satire and digital tools to express their discontent. Some resorted to artificial intelligence deepfakes, circulating disturbing images of the President and other leaders depicted in coffins as a metaphor for what they saw as the death of good governance and constitutionalism in Mamboleo. Though controversial, these digital protests captured widespread frustration and amplified calls for deeper accountability, putting the administration on the defensive.

29. Zula Kiwe, a 29-year-old digital activist and freelance journalist, was known for her outspoken posts on social media, often criticising local government corruption and police misconduct. In June, Zula released an exposé on the realities of the **Chapakazi Arid Lands Adaptation and Carbon Project**. Contrary to the government's reports of green growth and community empowerment, the investigation revealed a far darker reality of mass forced evictions, loss of ancestral grazing lands, and dispossession of entire communities under the guise of carbon trading. Families were evicted without resettlement plans, access to water points was restricted, and vast rangelands were fenced off to make way for commercial carbon offset projects. These revelations underscored how the project was not only exploitative but also a direct assault on the communities' constitutional rights, depriving them of sustainable livelihoods and degrading their living conditions. This sparked outrage all over social media on the land and environmental injustices in the country. Amidst this frenzy, Zula shared on her X platform that he had received threatening messages from influential individuals in the government who had instructed him to take down the exposé.

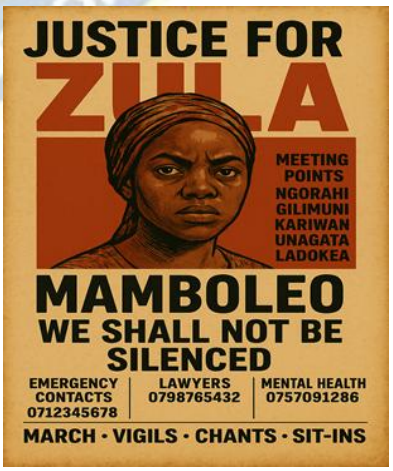
30. Undeterred and unfettered by the threats, she continued his work, and on 3 July 2025, Zula was arrested by police officers after allegedly publishing

defamatory content about a senior county official. According to the initial police report, Zula was detained overnight and found unconscious in her cell the following morning. Authorities claimed she had suffered a seizure and hit her head on the cell wall. However, a post-mortem conducted by an independent pathologist revealed multiple blunt force injuries, fractured ribs, and signs of strangulation, findings inconsistent with the police narrative.

31. News of Zula's death sparked outrage across Mamboleo. Hashtags like *#JusticeForZula* trended nationwide, with civil rights groups, journalists, and the public demanding an immediate investigation. Candlelight vigils were held in major towns, and a viral tweet by *@justicewatchtoday* shared the post-mortem findings with the caption; *"They silenced Zula. We won't be silent."* Within hours, *#JusticeForZula* was trending across Mamboleo. During this wave of online activism, mobile numbers and contact details of several Members of Parliament along with other prominent individuals perceived to support the government were leaked on social media under the hashtag *#Tuwasalimie*. Users were urged to flood them with messages and calls over the alleged impunity within government ranks, further inflaming tensions.

32. Activists launched a Telegram channel called 'Zula's Voice,' which quickly gained over 50,000 members. Google Docs circulated with protest logistics, meeting points, safety tips, and legal aid contacts.





33. Coordinated through Twitter Spaces and WhatsApp groups, simultaneous protests broke out across various parts of the country early in the morning, primarily led by the youth. In the run-up to and during the demonstrations, civil society organisations warned of a heightened risk that women participating in the protests could be specifically targeted, and social media later contained posts in which some users boasted of sexual assaults committed during the unrest. These warnings and online posts proved tragically prophetic. One of the most notable demonstrations occurred in the capital, where young people turned out in large numbers carrying whistles, the national flag, and placards with messages voicing their grievances. As the day progressed, the crowds swelled, and chants of dissent filled the air in the central business district.

34. Meanwhile, the police focused on crowd control, seeking to contain the demonstrations and protect property around the city. However, as the hours passed, the protests, which were initially peaceful, escalated into chaos. Around midday, a group of youths armed with clubs and crude weapons appeared and began harassing the demonstrators. Strikingly, these agitators seemed to be coordinating with some police officers on the ground to disperse the crowds.

35. Elsewhere, some protesters were seen breaking into shuttered business premises in the busy shopping districts. Live coverage from a leading media house captured the break-in of a supermarket, the subsequent looting, and the eventual burning of the store. This incident sparked further break-ins across the city, spreading to other businesses in the city centre. Live coverage also showed shocking images of packed vehicles, some of which were police owned, burning after being set ablaze by masked men. Reports of daylight robberies

also emerged from all over the city. Later reports from business owners quantified the loss at over Msh 21 billion.'

36. In response, the Deputy Inspector General of Police ordered the use of any means necessary to disperse the protesters and clear them from the city. Reinforcement units, including water cannons, were deployed downtown and across the city centre. Police fired warning shots, but as protesters gathered along major streets chanting "we are peaceful," officers advanced while firing directly at them, as evidenced from live broadcasts by the media. Teargas canisters were also launched, some landing inside business premises.

37. Journalists covering the protests were harassed, cameras smashed, and arrested in a move justified under the pretext of national security. The Mawasiliano Authority of Mamboleo ordered all media houses to cease the live broadcasts for the protests, and as a result, several media houses had their broadcasts shut down. Amid this silencing of the press, a darker form of violence unfolded. Women were deliberately targeted. They were singled out not merely by pushing or detaining them but also by dragging many into alleys, stairwells, and vans where they were sexually assaulted and, in multiple reported cases, raped as dozens of onlookers filmed the encounters on their phones.

38. What began as acts of physical violence gradually took on a digital dimension, as recordings of assaults on women circulated widely across online platforms. The resulting exposure amplified fear, discouraged reporting, and affected the ability of protesters to organise. Rights groups such as *Mulika* issued reports documenting incidents of sexual and gender-based violence (SGBV) during the demonstrations. Within one week, *Mulika* reported approximately 150 confirmed cases of rape and sexual assault in Mavukeni and other towns. However, it reiterated that the estimated total number could exceed **400 cases nationwide**, noting that many survivors did not come forward due to fear of stigma. Based on the reports, one victim who chose to remain anonymous,

recounted that the perpetrators recorded the entire ordeal, promising to circulate the video if she dared to report. She painfully recounts the mocking and the taunting, informing her that even if she reports *"tuko kwa serikali"* and how some perpetrators took it to social media platforms and bragged about assaulting and raping Women, highlighting that they would not face any consequences.

39. International observers described the incidents as serious violations of human rights and called on the Government to act swiftly. In response, the Government established a **Commission of Inquiry on Sexual and Gender-Based Violence** to investigate the reported incidents, identify perpetrators, and recommend reforms to prevent recurrence. The Ministry of Interior also announced interim administrative measures, including the suspension of several officers pending the outcome of the inquiry. Up to date the Commission is yet to finalise its findings.

40. In the country's western region, protests stretched into the evening. Despite continuous dispersal efforts, the crowds grew, with demonstrations in one area peaking around 7:00 p.m. Later reports revealed that under orders from the Deputy Inspector General, the regional police command deployed reinforcements with explicit instructions to end the protest. Officers pushed demonstrators into the Mukuru residential estate using live bullets, teargas, and water cannons. As the operation intensified, teargas canisters were indiscriminately hurled into the residential area. According to accounts later shared with the media by Mr Muhozi, police broke into his house, where he, his wife, and their three-year-old daughter, Baby Mel, were sheltering. The officers assaulted him, accusing him of being among the protesters and threatening to shoot him. Before leaving, they fired a teargas canister inside the house. When the smoke cleared, Mr Muhozi realised, to his horror, that the canister had exploded near his young daughter, injuring her head. She was

rushed to the hospital with severe trauma, but later succumbed to her injuries while undergoing treatment at the Western Region Level Five Hospital.

41. Additionally, the reports revealed alarming statistics on the fatalities that followed the protests and subsequent police operations. A total of 65 people were confirmed dead, most from gunshot wounds or blunt force trauma. In many cases, the victims were declared dead on arrival at hospitals, a clear indication that they had succumbed to their injuries while still in the streets. Furthermore, hospitals across the country recorded over 168 cases of injuries, including gunshot wounds, blunt force trauma from rubber bullets, and respiratory complications caused by excessive exposure to tear gas.

42. Different civil society groups such as Fichua, Angaza and Sisi kwa Sisi, all non-registered civil societies in Mamboleo filed different petitions challenging the persistent human rights violations in Mwangaza. The societies seek to hold the government responsible for the alleged violations of the Constitution and the Bill Rights. They are convinced that only the Constitutional Court will be able to render complete justice. The Court, pursuant to Civil Procedure Rules ordered the petitions to be consolidated into one case. The Chief Justice, thereafter appointed a bench of judges of the Constitutional Court to hear and determine the consolidated petition.

43. Prepare arguments for and against the case on the following issues, noting that: The Mamboleo laws and Constitution are similar to the Kenyan legal framework, and the Mamboleo Constitutional Court has equal status and powers as Kenya's High Court.

    1. **Whether the State violated the right to health through mismanagement of public debt?**

    2. **Whether the State violated the right to a clean and healthy environment, and its obligation in respect to the environment in**

establishing the Chapakazi Arid Lands Adaptation and Carbon Project (CALACP)?

3. Whether the actions of the state, regulatory bodies and law enforcement agencies constitute unlawful limitations on media freedom?

4. Whether the sexual and technology-facilitated attacks on women amid the protests constituted violations of their constitutional rights and whether the State met its constitutional obligations?

TAKE NOTICE;

1. All Laws in the Chapakazi and East Chapakazi Continent are analogous to the Laws of Africa and East Africa.

2. You are required to prepare cogent submissions for both the petitioner and the respondents addressing the issues of jurisdiction and admissibility.