THE REPUBLIC OF KENYA IN THE SUPREME COURT OF KENYA AT NAIROBI PRESIDENTIAL ELECTION PETITION NO. 5 OF 2022

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| RAILA AMOLO ODINGA | |
| MARTHA WANGARI KARUA2ND PETITIONER | |
| VERSUS | |
| INDEPENDENT ELECTORAL AND BOUNDARIES COMMISSION157 RESPONDENT | |
| WANYONYI WAFULA CHEBUKATI | 10 |
| BOYA MOLU | -10 |
| PROF. ABDI YAKUB GULIYE | |
| JULIANA WHONGE CHERERA | |
| JUSTUS NYANG'AYA | |
| | |
| FRANCIS WANDERI | |
| IRENE MASSIT | |
| WILLIAM SAMOEI RUIO | |
| WITNESS AFFIDAVIT OF VERONICA W. NDUATI | -20 |
| (In Support of the 9th Respondent's Case) | |
| DATED at NAIROBI this26THday ofAugust2022 | |
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| A DIVIGORATIC FOR THE OTH PESPONDENT | |

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REPUBLIC OF KENYA IN THE SUPREME COURT OF KENYA AT NAIROBI PRESIDENTIAL ELECTION PETITION NO. 5 OF 2022 BETWEEN:

| RAILA AMOLO ODINGA | |
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| INDEPENDENT ELECTORAL AND BOUNDARIES COMMISSION. 1ST RESPONDENT WANYONYI WAFULA CHEBUKATI. 2ND RESPONDENT BOYA MOLU. 3RD RESPONDENT PROF. ABDI YAKUB GULIYE. 4TH RESPONDENT JULIANA WHONGE CHERERA 5TH RESPONDENT JUSTUS NYANGAYA. 6TH RESPONDENT FRANCIS WANDERI. 7TH RESPONDENT IRENE MASSIT. 8TH RESPONDENT WILLIAM SAMOEI RUTO. 9TH RESPONDENT | 10 |
| WITNESS AFFIDAVIT OF VERONICA W. NDUATI (In Support of the 9th Respondent's Case) | —20 |
| I, VERONICA W. NDUATI of Post Office 37500-00100 NAIROBI in the Republic of Kenya do hereby make oath and state: - THAT I am an adult Kenyan citizen of sound mind, an advocate of the High Court of Kenya and the Secretary General of United Democratic Alliance (UDA). THAT I served as a Deputy Chief Agent of the 9th Respondent during the presidential elections held on 9th August 2022, | 30 |
| hence I am familiar with the matters herein, competent and duly authorized to swear this affidavit. | |

- 3. **THAT** I have read the Petition dated 21st August 2022, the affidavits in support and the witness affidavits. I have also sought legal counsel from my advocates on record, and wish to state as follows in opposition to the Petition:
- 4. THAT the averments at paragraph 9 of the Petition to the effect that "this court was shy to, and spared the 2nd Respondent" are baseless, uncalled for and calculated not only to embarrass the 2nd Respondent, but also to demean the Honorable Court.
- 5. THAT the assertions at paragraphs 10 to 16 of the Petition are hypothetical, unsubstantiated and without significance to the August 9 2022 elections which were conducted within the four corners of the law. Indeed, the 2nd Respondent has evidently been hospitable to fellow commissioners as discernible from pages 135 and 139 of the supporting affidavit of Martha Wangari Karua.
- 6. **THAT** the electoral principles enunciated at paragraphs 17 to 21 were observed through the electoral process running up to 9th August 2022 as opposed to the falsehoods expressed at paragraphs 22 to 35 of the Petition. The

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election was conducted substantially in compliance with the applicable Constitutional and statutory principles.

7. THAT contrary to the allegations at paragraphs 37 and 38 that the election was presided by a rogue chairperson, the material annexed to the affidavit of Martha Wangari Karua (Pages 99-111) reveals that the 2nd Respondent involved the Petitioners and their teams at all stages of the electoral process and meticulously responded to their concerns from time to time. Throughout the period of engagement, the 1st Respondent made serious efforts to address emergent matters raised by the Petitioners.

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8. THAT there was no false declaration of outcome of the presidential election as alleged at paragraph 39 of the Petition. There was compliance with the principles enunciated at Article 81 (e) (iii) (iv) and iv. The purported disowning of the results by the four disaffected commissioners has no basis in law as the 2nd Respondent as the Returning Officer is appropriately clothed with jurisdiction to declare presidential election results.

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9. <u>THAT</u> the 2nd Respondent proceeded to declare the results of the election of the President in accordance with Article 138(10) of the Constitution as mandated by section 39 (1H) of the Elections Act, 2011. The alleged denouncing of the final results by some of the commissioners was an improper attempt to overturn the order/process envisaged by the Constitution and Elections Act. It borders on abdication of duty and is untenable.

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misapprehension on the institutional character of the 1st Respondent as a body corporate which constitutes the various staff and election officials. Construing the commission to include only the commissioners would absurdly mean the commissioners would be absurdly imply that the commissioners would be under a strict and personal duty to count the votes, collate, tally and announce the same at each of the 46232 polling stations, 290 constituency tallying center as well as the national tallying center. This reality is humanly impractical. It is disingenuous for the Petitioners to assert that the 2nd Respondent "in isolation and by himself" carried out the task that involved hundreds of thousands of personnel.

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11.THAT the 27 constituencies cited at paragraph 40 of the Petition were indeed tallied and verified (with the participation of the four (4) commissioners) prior to the final declaration. The 1st Respondent conducted the counting, tallying and verification of the votes cast at the polling station, Constituency tallying centers and the National -10Tallying Centers and declared the results. Further, the results in the Forms 34B were verified to confirm that they reflect the results from Forms 34A and thereafter announced the results from each constituency. The final election results were supplied to the Chief agents, observers, media and members of the public. (Annexed hereto and marked **—20** "VNM1" are true copies of the handover reports of Forms 34B).

12.THAT the approach taken by the 1st and 2nd Respondent in discharging its mandate in relation to the election held on 9th August 2022, resonates with the excerpt of the Court of Appeal decision in <u>Independent Electoral and Boundaries</u>

Commission v Maina Kiai & 5 others [2017] eKLR cited at paragraph 41 of the Petition. There was absolutely no violation of the principles of the electoral system.

13. THAT contrary to the averments at paragraph 42 of the Petition, the public display of running results remained on course through various screens throughout the verification period, capturing diverse results as periodically announced by the Commission. Section 39 (1F) of the Elections Act, 2011 provides that "any failure to transmit or publish the election results in an electronic Format shall not invalidate the result as announced and declared by the respective presiding and returning officers at the polling station and constituency tallying center, respectively.

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14. THAT the arguments raised at paragraphs 43 to 47 of the Petition are anchored on imaginary figures which have no basis in law since The only results recognized are those contemplated by Regulation 83 (4) of the Election (General) Regulations, 2012 as read with Article 138 (10) of the Constitution, whereby the 2nd Respondent is mandated to declare the results after tallying and verification of the results as provided by law.

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15.THAT equally flawed are the consequential averments at

paragraphs 44 to 48 alleging failure to meet the 50% plus 1 vote requirement. Having been premised on unofficial

election results as declared at the polling station, the said arguments bear no weight of persuasion.

16.THAT the contention in relation to lack of security of IEBC election materials advanced at paragraphs 49 to 61 of the Petition is sensational and unsupported by evidence From the wilderness, the Petitioners have repeatedly made heavy weather of the dramatic arrest of Venezuelans, coupled with the cinema like press statements made by the Director of Criminal Investigations (DCI). The make believe press statement by the DCI is plainly a long shot and a futile expedition that is miserably incapable of sustaining the false narrative intended to impugn the integrity of the systems in use during the presidential election. The Petitioners fail to 2nd Respondent's give appropriate weight to the unconverted statement decrying harassment of personnel and confiscation of items belonging to IEBC. (see pages 90-91 of the supporting affidavit of Martha Wangari Karua).

17. IHAI the DCI's obsession with laptops and the Petitioners' technology paranoia is evidenced by the subsequent confiscation and scripting of an investigation around the laptop belonging to one Koech Geoffrey Kipsongos. To the

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minds of the Petitioners, every computing device they sight is capable of compromising or indeed compromised the August 9, 2022 presidential election. By using phrases to allege interference and penetration of IEBC systems, the Petitioners misguidedly hope to win sympathy from this Honorable Court based on spurious claims to the effect that the election was technologically compromised.

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18. THAT the petitioners' intention at paragraph 65 of the Petition to seek an order directing the National Police Service and in particular the DCI to produce the laptop purportedly retrieved from Koech Geoffrey Kipsongos smacks of mischief and a pathetic attempt to treat the Honorable Court to a wild goose chase. Strikingly, the DCI illegally took possession, access and control of the said computer without authority and in utmost disregard of numerous constitutional protections. There is nothing left to the imagination in relation to the synergetic relationship that subsists between the Petitioners and the DCI, epitomizing the worst Form of misuse of state agencies and public resources to advance the Petitioners' political cause.

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- 19. THAT the evidence alluded to at paragraphs 66 to 69 of the Petition and said to be contained in the further affidavit of Benson Wesonga extremely falls below requisite legal thresholds on account of the following:
 - i. Without any factual foundation, the deponent avers that there was a temporary storage of Forms 34A in an external address not belonging to IEBC. If such a storage existed, it could only have been set up by the deponent alongside the Petitioners.
 - ii. The "staging" platForm where Forms were allegedly

 "converted, manipulated and unlawfully dumped

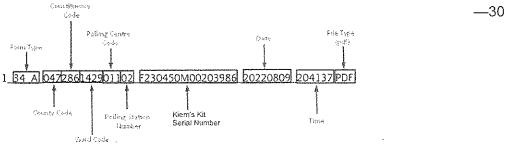
 into the IEBC portal" is to a rational mind imaginary

 and nonexistent.
 - iii. The deposition to the effect that the 1st Respondent dumped 11,000 Forms 34A on 11th August 2022 between 1101hrs-1109hrs contained at paragraph 70 of the Petition is wild, spurious and unsupported by evidence. It is in public knowledge that Form 34As were streamed randomly into the public portal as the counting process concluded at the polling stations.

- iv. The emails attributed to one Paul Wachanga Mugo are unauthentic and uncorroborated.
- 20. THAT I am aware that apart from the 1st Respondent's security features, all documents uploaded/downloaded from the IEBC Public Portal had a unique file naming Format that constituted of the following constituent parts;

i. Form type —10

- ii. County Code
- iii. Constituency Code
- iv. Ward Code
- v. Polling Centre Code
- vi. Polling Station Number __20
- vii. Kiems Kit Serial Number
- viii. Date
- ix. Time
- x. File Type



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21. THAT paragraphs 72 to 75 of the Petition are anchored on hearsay and conjecture and are of no probative value.

22. THAT the allegations at paragraphs 76 to 80 of the Petition relating to the sabotage, criminal and/or fraudulent interference, deliberate tampering and manipulation of election results were adequately addressed by the 1st Respondent through various correspondences exchanged between the Petitioners' and the Respondent. Matters relating to ballot papers and election material were protractedly litigated upon and settled prior to the general election, and cannot be cunningly reopened through the instant Petition. (see pages 68-73; 90-92; 99-111; 114-158) of the supporting affidavit of Martha Wangari Karua).

23. THAT the 1st and 2nd Respondents delivered a credible presidential election against the backdrop of multiple hardships and adversities calculated to undermine its mandate. (see pages 94-97 of the supporting affidavit of —30 Martha Wangari Karua).

24. THAT assertions at paragraphs 81 to 94 alleging manipulation and deliberate tampering of Forms 34A are based on peculiar "physical copies of Forms 34A"

purportedly issued to the petitioners' agents at the polling stations, which differ from Forms 34A uploaded onto the IEBC portal. The said Forms can only be deemed as having been fabricated and falsified by the Petitioners to cast doubts on the presidential elections. The Petitioners admit as much at paragraph 89 (iv) of the Petition where they affirm the existence of software that "allows one to alter or change contents of a PDF." Using the aforesaid software, the Petitioners have generated bogus Forms 34A which they are now using to anchor a false narrative of hacking, digital manipulation and stealing of votes.

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25. THAT the supporting affidavit sworn by one Susan Wambugu on 20th August 2022 in support of the averments at paragraphs 84 to 102 is laden with perjury and is based on matters outside the deponent's knowledge to the following extent:

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i. Notwithstanding the lack of basic credentials, Susan Wambugu, falsely deposes at paragraph 3 of her affidavit that she is a forensic expert. Her only known qualification is a degree of Bachelor of Science in Horticulture conferred upon her by Moi University on

19th October 2007. The rest of the purported credentials are seminar attendances which cumulatively amount to less than 30 days in total and out-rightly incapable of conferring valid professional recognition or competence as a document examiner.

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the affidavit that she prepared the report, the forensic document examiner's report features two examiners and is signed by CI Susan Wambugu and CI Daniel M Gutu. It is not true that Susan Wambugu prepared and submitted the forensic report to the Petitioners as at paragraph 5 of the affidavit dated 20th August 2022.

26. THAT the petitioners' case is predicated upon counterfeit documents, fake Forms 34A and a bogus document examiner.

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27. THAT nevertheless, it is self-evident that the results declared by the 1st and 2nd Respondents are those contained in original and verified Forms 34A. The eccentric affidavit of John Mark Githongo sworn in support of the foregoing

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allegations is purely grounded on hearsay and unfit for purpose. Apart from the spurious computations based on fake Forms originated by the Petitioner, there is nothing worth the inquiry of the Honorable Court.

28. THAT with regard to the depositions on vote differentials at paragraphs 95 to 106, I wish to state as follows:

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The figures presented at paragraph 96 do not disclose any material variances. Even where discrepancies are observed, they cannot be blindly and solely attributed to the presidential election.

The variances between the presidential tally and those of other elective positions may accrue from numerous factors including the aspects of stray ballots and rejected ballots, which are not uniForm across the elective positions, as well as the inclusion of prison votes which are exclusive to the presidential

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election.

The mere existence of electoral figures per se cannot iii. be the basis for inferring all manner of speculations in order to discredit the presidential election.

29.THAT the comparisons, computations and variances borne in the affidavits of Celestine Onyango and Arnold Ochieng Oginga have manifest errors and humongous numerical distortions. The authenticity of the Forms 34A cited is in serious doubt. Besides, the ostensible comparison of Forms 34A drawn from the polling stations against County based Forms 34B is strange and misguided.

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30. THAT contrary to arguments at paragraphs 103 to 106 of the Petition, that the cancellation of gubernatorial elections for ulterior motives, section 55B (1) (b) of the Elections Act, 2011 and Regulation 64A (1) (b) of the Elections (General) Regulations, 2012 mandate the 1st Respondent to postpone the election in a constituency, county or ward for such period as it may consider necessary based on a range of stipulated considerations.

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31. THAT the contention at paragraph 105 of the Petition that the Counties where elections were postponed are areas where the 1st Petitioner has a strong base and support is speculative, self-serving and factually unfounded. All candidates stood equal chance and suffered equivalent prejudice, if any. Nothing would have prevented a willing

voter from turning up at a polling station to vote for a preferred presidential candidate notwithstanding the postponement of elections relating to other elective positions.

32. THAT failure of the KIEMS kits was not confined to specific areas as alleged at paragraphs 107 to 112 of the Petition, but rather occurred randomly based on diverse factors which affected the retrieval of voter data. Minor delays in attending to voter queues is an issue that cuts across the entire country possibly due to large numbers of voters arriving at similar intervals. No evidence has been tendered to show that there were voters in the queue who were not allowed to vote, hence the allegation of voter suppression is immaterial.

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33. THAT the e-forensics analysis alluded to at paragraphs 113 to 114 is produced by one Prof. Walter Richard Membrane, a publicly acclaimed die-hard supporter of the Petitioners, hence is grossly tainted with partiality and subjectivity. The theoretical conclusions drawn therefrom are fallacious and statistically unsupported. Despite the glaring errors and inconsistencies bedeviling the analysis, the report still

concedes that the 9th Respondent won the presidential contest on 9th August 2022.

34. THAT with regard to the alleged offences and ethical breaches committed by the 2nd Respondent, the Petitioners are riding on fantasy. Section 15 of the Independent Electoral and Boundaries Commission Act, 2011 provides that "nothing done by a member of the Commission or by any electoral officer shall, if done in good faith for the purpose of executing the powers, functions or duties of the Commission under the Constitution or this Act, render such member or officer personally liable for any action, claim or demand."

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35. THAT the protection availed to the 2nd Respondent by section 15 of the Independent Electoral and Boundaries Commission Act, 2011 renders paragraphs 115 to 127 of the Petition otiose and absolutely idle.

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- **36.** <u>THAT</u> the issues framed by the Petitioners for determination by the court are rhetorical.
- **37. IHAT** the reliefs sought by the Petitioners are incongruent, contradictory, res judicata and incapable of being granted

by the Honorable Court. Hence, it is in the in the interest of justice, that the Petition herein be dismissed forthwith.

38.THAT on various dates between 13th and 15th August 2022, the Petitioners' Chief agent, Saitabao Kanchory, while assisted by Ledama ole Kina, Babu Owino, Phelix Odiwuor, Rachael Shebesh and Gladys Wanga and others attacked ---10 and caused injuries to Commissioners and officials of the 1st Respondent namely: Wafula Chebukati; Abdi Yakub Guliye and Marjan Hussein Marjan; Ann Mwanzia; and further destroyed and attempted to snatch and destroy election materials with a view to paralyzing and crumbling the ---20 presidential election and possibly foment a constitutional crisis. The violent incidents are actively pending at Lang'ata Police Station under OB Numbers 03/13/08/2022, 30/13/08/2022. 02/14/08/2022, 04/14/08/2022, 08/14/08/2022, 15/14/08/2022, 20/15/08/2022, 29/15/08/2022 and 31/15/08/2022. The aforementioned --30 offenders are expected to be arraigned in court to answer charges relating to multiple criminal transgressions. It is patently clear that the Petitioners have approached this Honorable Court with unclean hands and are estopped

from approaching this court by among others, the time honoured doctrine of ex turpi causa non oritur actio.

- 39. THAT indeed, I should not close this affidavit without stating clearly that the Petitioners come to this Court seeking relief which is not due to them, on account of their misuse of state resources and state officers throughout the electoral process, as well as their commission of electoral offences during the campaign period and at the National Tallying Center. In an apparent extension of the illegal BBI process, this election cycle has been replete with the abuse of state power. The Court should not view the instant petition in a vacuum void of its political and historical context.
- 40. This context and related particulars are critical in four regards. First, the Petitioner has lost a general election five times yet he has never accepted election results, always attempting instead to forge a position of personal power by fomenting violence or forcing the courts to entertain his complaints, even where they are fanciful or false. The substance and purpose of the current petition is no different. Secondly, the state apparatus, controlled by the Commander-in-Chief, who has doubled up as the

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Chairperson of the Azimio la Umoja One Kenya Coalition, has unashamedly spared no effort to ensure that the 9th Respondent is not sworn in as the Fifth President of the Republic of Kenya. Thirdly, the Petitioner has requested relief involving the Directorate of Criminal Investigations and its conduct of forensic audits of various electronic devices, despite the partisan weaponization of the DCI throughout the campaign period and tallying process. Finally, the Petitioner has requested scrutiny of the votes, an upshot of which, leaving aside the question of Constitutionality, may be that the Supreme Court makes a declaration as to the winner has not committed an election offence.

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without considering that the same Petitioner does not come to Court with clean hands. The 9th Respondent through his political party, the WSR Presidential Campaign Secretariat have consistently raised concerns about the blatant use of state officers on the campaign trial In this regard, the outgoing President has with bravado encouraged state officers and public servants, from Cabinet Secretaries, to

Chiefs, to County Commissioners, to engage in intimidation and harassment of supporters of the 9th Respondent.

42. THAT given the outgoing President's succession plan for the Petitioner, he emboldened Cabinet Secretaries to publicly pledge their loyalty to the opposition candidate and to warn voters that they should follow their lead or else.

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43. THAT in the weeks prior to the election, the Head of State implemented a widespread and systematic plan to engage Chiefs and County Commissioners in extortion and voter suppression tactics. The Directorate of Criminal Investigations based on 'orders from above' undertook a series of false arrests, confiscation of electronic equipment from people related to the party and the candidate, and illicit surveillance of supporters of the 9th Respondent; targets were politicians, IT personnel, Party and Secretariat premises, and technical staff.

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44. THAT despite this, and against all odds, the general election on the 9th of August was free and fair and met every metric of credible, transparent and verifiable elections. Yet, this misuse of and stranglehold on state institutions and personnel culminated in the near coup witnessed at Bomas,

the National Tallying Center, during the verification and declaration of election results. The Chief Agent for Azimio eerily predicted and ensured that Bomas was a crime scene. The Petitioner and his agents should not be rewarded for their misdeeds.

- **45. THAT** I swear this affidavit in utmost opposition to the Petition herein and pray that the 2nd Respondent's declaration of the 9th Respondent as the President elect be upheld.
- **46. THAT** what is deposed herein is true to the best of my knowledge, information and belief, save where otherwise stated and sources thereof disclosed.

(Deponent)

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