

**IN THE REPUBLIC OF KENYA
IN A DOMESTIC ARBITRATION**

BETWEEN

CAROLINE ATIENO ANDITI – CLAIMANT

AND

THE ESTATE OF CHARLES ORINDA OWINY (DECEASED) - 1st RESPONDENT

THE ESTATE OF JULIUS OLUOCH MBOM (DECEASED) - 2nd RESPONDENT

ARBITRATION AWARD

Juridical Seat: Kenya

Arbitrator: Isaac Aluochier, FCIArb

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The Parties

1. The Claimant, Caroline Atieno Anditi, resides on and farms about 0.47 hectares (1.16 acres) of land parcel Kamagambo/Kanyamamba/603, which measures about 1.40 hectares. She has been residing and farming on that parcel, together with her three children, Roney Anditi, Oscar Anditi and Gideon Anditi, since 2009, the year her late husband and father to her three children, Raphael Anditi Othoo, died and was buried on the said land parcel.
2. The Respondents are the Estates of two deceased persons, Charles Orinda Owiny and Julius Oluoch Mbom, who are the registered joint owners of land parcel Kamagambo/Kanyamamba/603. Charles Orinda Owiny died in the year 2002, while Julius Oluoch Mbom died in the year 2012. The Estate of Charles Orinda Owiny has an administratrix, his widow, Carren Akeyo Owiny. The Estate of Julius Oluoch Mbom is understood not to have an administrator that has been lawfully appointed.

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Claimant's Case

3. The Claimant states that on 10th October, 2023 the administratrix to the Estate of Charles Orinda Owiny, seemingly acting together with a neighbour named Mr Ojuka Andhoga, laid an oral claim to recover Kamagambo/Kanyamamba/603, measuring 1.4 hectares, and registered jointly in the names of Charles Orinda Owiny and Julius Oluoch Mbom, the registration having been made on 25th November, 1980. If the administratrix's oral claim was sustained in law, it would mean that the Claimant and her three children would have to move out of the property, where they have been living and farming peacefully, openly, continuously and without interruption since 2009 – over 14 years. The Claimant states that upon her family's entry onto the property, she had not sought the permission or authority of the registered owners or their representatives. She states that it is her belief that title to the

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land under her occupation and use, about 0.47 hectares of the total land parcel area of 1.4 hectares, was cancelled by the operation of law upon her and her children having lived on the said portion under her occupation and use for a period of at least 12 years. She is therefore praying that the law formally recognises that the land under her occupation and use had its title registered in the names of the Respondents cancelled, and that she should now be formally registered as the owner of 0.47 hectares of Kamagambo/Kanyamamba/603.

Authority For Arbitration

4. In bringing this Claim for arbitral administration by Aluochier Dispute Resolution, she did not provide evidence of any arbitration agreement between herself and the Respondents. She instead asserted her Article 50(1) of the Constitution right that provides that every person has the right to have any dispute that can be resolved by the application of law decided in a fair and public hearing before a court or, if appropriate, another independent and impartial tribunal or body. She believes that as it is the right of every person to institute legal proceedings before an independent and impartial tribunal or body, whether or not that independent and impartial tribunal or body is a court, she does not need a separate arbitration agreement with the Respondents, or the permission of the Respondents, in order for her to institute arbitration proceedings against the Respondents, just as she does not need the same to institute court proceedings against them. Her right under Article 50(1) applies to any independent and impartial tribunal or body, including both courts and others that are not courts, such as arbitral tribunals.

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Respondents Aware Of The Arbitration

5. The Respondents, through the administratrix to the Estate of the 1st Respondent, were made aware on 24th November, 2023 of the institution of the arbitration proceedings, together with details of the Claimant's case. They were requested to submit their Statement of Defence by 15th December, 2023, pursuant to Rule 15.3 of the Aluochier Dispute Resolution Arbitration Rules (ADRA Rules), with a copy of the ADRA Rules sent to them as part of the communication. Supplementary documents from the Claimant were sent to the Respondents on 3rd December, 2023, by way of Kenya Gazette notices touching upon the deceased

Respondents, a mutation form for the subdivision of Kamagambo/Kanyamamba/125 which was subdivided into Kamagambo/Kanyamamba/602 and 603 and a Certificate of Official Search for Kamagambo/Kanyamamba/603. On 25th January, 2024 all the documents that had previously been served electronically by WhatsApp were sent physically by registered post to the Respondents, and again by WhatsApp – as the Respondents had still not formally responded to the Statement of Claim.

6. On the afternoon of 24th January, 2024, at about 15:36 hours, a phone call was received from one Keith Mbom, a son to the 2nd Respondent. He informed that his father had died in 2012 and that his estate does not yet have a lawfully appointed administrator, with his mother only managing the estate informally. I advised him that a response from the Estate of the 2nd Respondent was needed within about 14 days, to facilitate the arbitration progressing with the benefit of the 2nd Respondent's input. I also advised him to consult with the family's lawyers, upon which they would have a basis for responding in the arbitration. I then informed the Claimant that the 2nd Respondent's family member had now made contact in the arbitration, and were fully aware of the arbitration and the documents in it. 10
7. It is now over two months since the last communication to the parties. All parties are fully seized of the arbitration, and have been given more than adequate time to file whatever documents that they intended to file, if indeed they intended to file any. It turns out that only the Claimant has filed her Statement of Claim, while the Respondents, despite being fully aware of the Claim, have chosen not to respond to the same. 20

Ex Parte Arbitration Proceedings

8. Article 50(1) of the Constitution provides that every person has the right to have any dispute that can be resolved by the application of law decided in a fair and public hearing before an independent and impartial tribunal or body. As the Claimant has this right, and an independent and impartial tribunal – this arbitral tribunal – has been constituted for the resolution of her dispute, in fulfilling her dispute resolution right, the arbitral tribunal must proceed with the resolution of her dispute by the application of law.

Issue For Determination

9. The single issue to be determined in this arbitration is whether or not the Claimant is entitled to her prayer to be registered as the lawful owner of 0.47 hectares of Kamagambo/Kanyamamba/603 on account that she has been in peaceful, open, continuous and uninterrupted occupation of and farming since 2009 without the permission of the registered owners.
10. In answering the Claimant's prayer, the rights of all the parties in this arbitration need to be considered in accordance with the law. This will be done as much as possible in a chronological fashion.

Registered Joint Proprietors Rights

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11. On 25th November, 1980 Charles Orinda Owiny and Julius Oluoch Mbom were registered as the joint owners of Kamagambo/Kanyamamba/603. The law applicable at the time was the Registered Land Act (Cap. 300). Section 101(1) of this Act provides that an instrument made in favour of two or more persons, and the registration giving effect to it, shall show – (a) whether those persons are joint proprietors or proprietors in common; and (b) where they are proprietors in common, the share of each proprietor. The Certificate of Official Search issued by the Land Registrar, Migori County, dated 21st June, 2023 shows that the proprietors of Kamagambo/Kanyamamba/603 are Charles Orinda Owiny and Julius Oluoch Mbom. As the shares of these two proprietors is not separately shown, it is implied that their proprietorship is NOT proprietorship in common, but is joint proprietorship.

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12. Section 102(1) of the Registered Land Act provides that where the land, lease or charge is owned jointly, no proprietor is entitled to any separate share in the land, and consequently – (a) dispositions may be made only by all the joint proprietors; and (b) **on the death of a joint proprietor, his interest shall vest in the surviving proprietor** or the surviving proprietors jointly.
13. Section 118 of the Registered Land Act provides that if one of two or more joint proprietors of any land, lease or charge dies, the Registrar, on proof to his satisfaction of the death, shall delete the name of the deceased from the register.

Rights Upon The Death Of The First Respondent

14. Going by the evidence of Gazette Notice No. 7781, dated 12th November, 2002, and signed by J M Munguti, Deputy Registrar, Kisumu, and published in the Kenya Gazette dated 29th November, 2002 on page 2897, Charles Orinda Owiny died at Ahero on 10th September, 2002. Pursuant to section 101(1)(b) of the Registered Land Act, upon his death his interest in Kamagambo/Kanyamamba/603 vested in his fellow joint proprietor, Julius Oluoch Mbom. Meaning that **as from 10th September, 2002 Julius Oluoch Mbom was the sole proprietor of Kamagambo/Kanyamamba/603.**

Rights Upon The Death Of The Second Respondent

15. As reported by his son Keith Mbom on 25th January, 2024, Julius Oluoch Mbom died 10 in the year 2012. Gazette Notice No. 10643 dated 22nd October, 2007 and signed by A C Ong'injo, Deputy Registrar, Kisumu, and published in the Kenya Gazette of 2nd November, 2007 at page 3223, proves that Julius Oluoch Mbom was indeed still alive as at 2007, and therefore survived his joint proprietor to Kamagambo/Kanyamamba/603, Charles Orinda Owiny.
16. Section 119(1) of the Registered Land Act provides that if a sole proprietor or a proprietor in common dies, his personal representative, on application to the Registrar in the prescribed form and on production to him of the grant, shall be entitled to be registered by transmission as proprietor in the place of the deceased with the addition after his name of the words “as executor of the will of deceased” or “as administrator of the estate of 20 deceased”, as the case may be. The Land Registration Act (LRA), which repealed the Registered Land Act (Cap. 300), commenced on 2nd May, 2012. Section 2 of the LRA provides that “transmission” means the passing of land, a lease or a charge from one person to another by operation of law on death, insolvency or otherwise. Section 61(1) of the LRA provides that if a sole proprietor or a proprietor in common dies, the proprietor's personal representative shall, on application to the Registrar in the prescribed form and on production to the Registrar of the grant, be entitled to be registered by transmission as proprietor in the place of the deceased with the addition after the representative's name of the words “as executor of the will of [deceased]” or “as administrator of the estate of [deceased]”, as the case may be. 30

17. As at the present, no grant of representation has been issued with respect to the Estate of Julius Oluoch Mbom, no representative has been entitled to be registered as proprietor of Kamagambo/Kanyamamba/603 in the place of Julius Oluoch Mbom, and so only the name of Julius Oluoch Mbom has been entitled to be in the register with respect to ownership of Kamagambo/Kanyamamba/603.

Commencement Of Adverse Possession

18. In 2009 the Claimant and her three sons moved into occupation and use of 0.47 hectares of Kamagambo/Kanyamamba/603, without any permission or authority from Julius Oluoch Mbom, who was still alive at the time. At the time when the 2nd Respondent died, in 2012, the Claimant was still in occupation and use of the said portion of the land, and has remained in continued, peaceful, open and uninterrupted occupation and use of the same right up to the present, with her occupation and use continuing. 10

Recovery Of Land After 12 Years Of Adverse Possession

19. Section 7 of the Limitation of Actions Act provides that an action may be brought by any person to recover land **after the end of twelve years from the date on which the right of action accrued to him** or, if it first accrued to some person through whom he claims, to that person. The preamble to the Limitation of Actions Act provides that it is an Act of Parliament to prescribe periods for the limitation for actions and arbitrations, and to make provision for the acquisition of easements by prescription, and for matters incidental thereto and matters connected therewith. 20

Limitation Of Actions Act Applies Equally To Actions And Arbitrations

20. Section 2 of the Limitation of Actions Act provides that “arbitration” means an arbitration on a submission or under a written law; “award” means an award of an arbitrator for the purposes of the Arbitration Act (Cap. 49) or a foreign award within the meaning of the Arbitration (Foreign Awards) Act (Cap. 50).

21. Section 34(1) of the Limitation of Actions Act provides that this Act and any other

written law relating to the limitation of actions apply to arbitrations as they apply to actions.

22. Consequently, reading together the above provisions of the Limitation of Actions Act, especially sections 7 and 34(1), the Claimant **may** indeed have a right to institute an arbitration for the recovery of the 0.47 hectares of Kamagambo/Kanyamamba/603 that she and her sons have been in occupation and use of since 2009 – a period of over 14 years. It will be shown below that the Claimant indeed has a right to institute arbitration for the recovery of the said 0.47 hectares.

Adverse Possessor Must Be In Possession Upon Instituting Arbitration

23. Section 13(1) of the Limitation of Actions Act provides that a right of action to recover land does not accrue unless the land is in the possession of some person in whose 10
favour the period of limitation can run (which possession is in this Act referred to as adverse possession), and, where under sections 9, 10, 11 and 12 of this Act a right of action to recover land accrues on a certain date and no person is in adverse possession on that date, a right of action does not accrue unless and until some person takes adverse possession of the land. As the Claimant has been in possession of 0.47 hectares of Kamagambo/Kanyamamba/603 for a period in excess of 12 years, and remains in possession to the present, a right of action or arbitration to recover land indeed accrues to her.

Title Of Adversely Possessed Land Extinguished After 12 Years

24. Section 17 of the Limitation of Actions Act provides that subject to section 18 of this Act, **at the expiration of the period prescribed by this Act for a person to bring an 20
action to recover land** (including a redemption action), **the title of that person to the land is extinguished**. Consequently, at the expiration of the 12 years provided for in section 7 of this Act, the Estate of Julius Oluoch Mbom's title to the 0.47 hectares under the Claimant's occupation and use was extinguished! Meaning that in law this 0.47 hectares ceased to belong to the Estate of Julius Oluoch Mbom.

Limitation Of Actions Act Applies To Registered Land

25. Section 37 of the Limitation of Actions Act provides that this Act applies to land registered under the Government Lands Act (Cap. 280), the Registration of Titles Act (Cap. 281), the Land Titles Act (Cap. 282) or the Registered Land Act (Cap. 300), in the same manner and to the same extent as it applies to land not so registered. Pursuant to section 109 of the LRA and the Second Schedule to the LRA, these stated Acts were all repealed by the LRA, and were replaced by the LRA.

Remedy For Adverse Possessors Seeking Registration As Owners

26. Section 38(1) of the Limitation of Actions Act provides that where a person claims to have become entitled by adverse possession to land registered under any of the Acts cited in section 37 of this Act, or land comprised in a lease registered under any of those Acts, **he may apply to the High Court for an order that he be registered as the proprietor of the land or lease in place of the person then registered as proprietor of the land.** Section 38(2) provides that an order made under subsection (1) of this section shall on registration take effect subject to any entry on the register which has not been extinguished under this Act. 10

Can Adverse Possessors Obtain Remedy In Arbitration?

27. In the instant arbitration the Claimant has made application for an order that she be registered as the proprietor of 0.47 hectares of Kamagambo/Kanyamamba/603 in place of the currently registered proprietors, Charles Orinda Owiny and Julius Oluoch Mbom, on account of having been in adverse possession of the said land for a period in excess of the 12 years provided for in section 7 of the Limitation of Actions Act. Her application has been made in arbitration, rather than in court, as provided for in section 38 of this Act. Is her application in arbitration, and not in court, valid in law? 20

Judicial Authority Delegated To Courts And Independent Tribunals

28. Article 1(1) of the Constitution of Kenya provides that all sovereign power belongs

Aluochier Dispute Resolution Arbitration Award	<i>C A Anditi v Estates of C A Owiny & J O Mbom (Both Deceased)</i>	<i>Page 9</i> <i>31st March, 2024</i>
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to the people of Kenya and shall be exercised only in accordance with this Constitution. Article 1(3)(c) provides that sovereign power under this Constitution is **delegated to** State organs, which shall perform their functions in accordance with this Constitution, and include **the Judiciary and independent tribunals**. Article 159(1) provides that **judicial authority** is derived from the people and vests in, and **shall be exercised by, the courts and tribunals** established by or under this Constitution. Article 50(1) provides that every person has the right to have **any dispute that can be resolved by the application of law** decided in a fair and public hearing before **a court or, if appropriate, another independent and impartial tribunal or body**. Judicial authority, involving the resolution of any dispute capable of resolution by the application of law, has been delegated to courts and tribunals established by or under this Constitution, and such courts or tribunals must be independent and impartial. 10

Resolution Of Any Dispute By The Application Of Law

29. Pursuant to Article 50(1) of the Constitution, the jurisdiction for dispute resolution granted non-court independent and impartial tribunals relates to **ANY** dispute that is not inappropriate for such to resolve. Which begs the question – which, if any, are the disputes that are not appropriate for resolution by non-court independent and impartial tribunals or bodies?

Exclusion Of Criminal Proceedings

30. Article 50(2)(d) of the Constitution provides that it is **the right of every accused person** to a fair trial, which includes **the right to a public trial before a court established under this Constitution**. Article 50(2)(d) restricts criminal proceedings to “a court established under this Constitution”, and does not provide for “another independent and impartial tribunal or body” as provided for in Article 50(1). Consequently, it is implied that it is not appropriate to institute criminal proceedings for resolution before non-court independent and impartial tribunals or bodies, on account of not contravening the right of an accused person to a public trial before a court established under this Constitution. 20

Exclusion Of Presidential Election Petitions

31. Article 163(3)(a) of the Constitution provides that the Supreme Court shall have **exclusive** original jurisdiction to hear and determine disputes relating to the elections to the office of President arising under Article 140. Article 140(1) provides that a person may file a petition in the Supreme Court to challenge the election of the President-elect within seven days after the date of the declaration of the results of the presidential election. Consequently, as the determination of presidential election disputes pursuant to Article 140 is the exclusive preserve of the Supreme Court, a non-court independent and impartial tribunal or body does not have the jurisdiction to hear and determine the same, and so it is not appropriate for such to purport to hear and determine such a dispute.

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All Other Disputes Appropriate

32. Outside these two categories of disputes, the Constitution does not provide for any other type of dispute that is inappropriate for non-court independent and impartial tribunals or bodies to hear and determine by the application of law. Which implies that it is indeed appropriate for an arbitral tribunal, which is a non-court independent and impartial tribunal, to hear and determine any other type of dispute, including the type of dispute provided for in section 38 of the Limitation of Actions Act.

Construing Section 38(1) Of The Limitation Of Actions Act

33. Article 2(1) of the Constitution provides that the Constitution is the supreme law of Kenya and binds all persons and all State organs at both levels of government. Section 7(1) of the Sixth Schedule of the Constitution provides that all law in force immediately before the effective date continues in force and shall be construed with the alterations, adaptations, qualifications and exceptions necessary to bring it into conformity with this Constitution. The Constitution became effective on 27th August, 2010, while the Limitation of Actions Act commenced on 1st December, 1967. Therefore, construing section 38(1) of the Limitation of Actions Act – an existing law when the Constitution became effective, providing that a person may apply to the High Court, as read together with Article 50(1) of the Constitution, providing that non-court independent and impartial tribunals may determine **ANY** dispute

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that can be resolved by the application of law unless it is inappropriate for such to do so, and Articles 162(2)(b) and 165(5)(b), removing the jurisdiction over environment and land disputes outside that of the High Court, section 38(1) of the Limitation of Actions Act should be construed to read:

Where a person claims to have become entitled by adverse possession to land registered under any of the Acts cited in section 37 of this Act, or land comprised in a lease registered under any of those Acts, he may apply to the Environment and Land Court or to another independent and impartial tribunal or body that he be registered as the proprietor of the land or lease in place of the person then registered as proprietor of the land.

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Arbitral Tribunal Has Jurisdiction Over Section 38(1) Claims

34. The Claimant therefore acted lawfully in bringing her claim that she be registered as proprietor of part of Kamagambo/Kanyamamba/603 in place of the currently registered proprietors, Charles Orinda Owiny and Julius Oluoch Mbom, before this arbitral tribunal – an independent and impartial tribunal pursuant to Articles 1(3)(c), 50(1) and 159(1) of the Constitution, as this arbitral tribunal has the constitutionally bestowed jurisdiction to resolve her type of dispute.

Summary Of Findings

35. In summary, I make the following findings:

35.1. On 25th November, 1980 Charles Orinda Owiny and Julius Oluoch Mbom were registered as the proprietors of Kamagambo/Kanyamamba/603 measuring 1.40 hectares.

35.2. Pursuant to section 101(1)(b) of the Registered Land Act (Cap. 300), upon Charles Orinda Owiny's death on 10th September, 2002, his interest in Kamagambo/Kanyamamba/603 vested in his fellow joint proprietor, Julius Oluoch Mbom.

35.3. In 2009 the Claimant and her three sons took possession of part of Kamagambo/Kanyamamba/603, being 0.47 hectares of it, peacefully, without permission from Julius Oluoch Mbom, and have been living and farming upon the same peacefully,

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openly, continuously and without interruption from then to the present.

35.4. Despite information that Julius Oluoch Mbom died in 2012, his estate is still without lawfully appointed representation. Consequently, his estate was not represented before the instant arbitration.

35.5. As the Claimant has satisfied the requirements for obtaining title by way of adverse possession to 0.47 hectares of Kamagambo/Kanyamamba/603, she had and has indeed become entitled to the same. The remaining portion of Kamagambo/Kanyamamba/603, being about 0.93 hectares, remains unaffected by the Claimant's entitlement to the 0.47 hectares that she has become entitled to.

Costs Of The Arbitration

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36. With respect to the costs of the arbitral tribunal and the administering institution, as the Respondents did not participate in the arbitration, all of the said costs are to be borne by the Claimant, pursuant to section 32B of the Arbitration Act, 1995, that provides that unless otherwise agreed by the parties, the costs and expenses of an arbitration, being the legal and other expenses of the parties, the fees and expenses of the arbitral tribunal and any other expenses related to the arbitration, shall be as determined and apportioned by the arbitral tribunal in its award under this section, or any additional award under section 34(5). Each party is to bear its own legal and other expenses of the arbitration.

37. The estimated minimum value of the 0.47 hectares of Kamagambo/Kanyamamba/603 is Kshs 2,350,000/-. Pursuant to Part 4 of the First Schedule to the ADRA Rules, arbitral tribunal fees, for *ex parte* proceedings, should be 50% of Kshs 163,500/-, the fee for defended proceedings, and so amount to **Kshs 81,750/-**. Administrative costs amount to **Kshs 32,700/-**. So total costs of the arbitral tribunal and the administration of the arbitration amount **Kshs 114,450/-**. Pursuant to Rule 26.6 of the ADRA Rules, this amount shall be a first charge over the 0.47 hectares that the Claimant is entitled to, in favour of the administering arbitral institution – Aluochier Dispute Resolution, collecting the same on behalf of itself and the arbitral tribunal. Interest on these dues shall accrue at the rate of 12% per annum compounded monthly until fully settled, assessed as from the date of the arbitral award.

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Final Orders

38. In concluding, I make the following orders to give effect to the above:

38.1. The Land Registrar, Migori County, to facilitate the subdivision of Kamagambo/Kanyamamba/603 into two parcels measuring 0.93 hectares and 0.47 hectares, and registration in the joint names of Charles Orinda Owiny and Julius Oluoch Mbom for 0.93 hectares, and the sole name of Caroline Atieno Anditi for 0.47 hectares. The Claimant to bear the costs of the subdivision of Kamagambo/Kanyamamba/603 and registration of 0.47 hectares in her own name.

38.2. The Claimant to pay Aluochier Dispute Resolution, the arbitral institution administering this arbitration, the total of the arbitral tribunal fee and arbitration administration fee amounting to Kshs 114,450/-. This amount, while any of it remains unpaid, attracts interest at the rate of 12% per annum compounded monthly until fully settled. Until the arbitral tribunal and arbitration institution fees are fully settled, Aluochier Dispute Resolution shall have a first charge on the 0.47 hectares of Kamagambo/Kanyamamba/603 entitled to the Claimant. 10

Dated and signed at Rongo on 31st March, 2024

With the arbitration juridical seat being Kenya



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Arbitrator

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