
Request for Arbitration in Case Number ADRC2025-001 - Four Sons Holdings (K) Limited v County Government of Migori

Aluochier Dispute Resolution <aluochierdisputeresolution@gmail.com>

31 January 2025 at 09:43

To: procurement@migori.go.ke, migoricountygov@gmail.com, Gradus Oluoch Adis <countyattorney@migori.go.ke>, "foursonsholdings@gmail.com" <foursonsholdings@gmail.com>

Cc: Isaac Aluochier <aluochier@gmail.com>

Dear Four Sons Holdings (K) Limited and the County Government of Migori

Find attached a letter from the arbitral institution informing you of the appointment of an arbitral tribunal to hear and determine your dispute.

Regards

Aluochier Dispute Resolution

Arbitral Institution


Arbitration & Mediation

P O Box 436-40404, Rongo, Kenya

Telephone: +254114712433

Email: aluochierdisputeresolution@gmail.comWebsite: www.aluochier.co.ke

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 **ADRC2025-001-appointment-of-arbitral-tribunal-20250131.pdf**
372K

Aluochier Dispute Resolution

Arbitral Institution | Arbitration | Mediation

*P O Box 436-40404, Rongo, Kenya
Telephone: +254 114 712433
info@aluochier.co.ke | www.aluochier.co.ke
Registration No: BN-BGCLBG7
Proprietor: Serveyah Limited
KRA PIN: P052390407R*

31st January, 2025

1. **Four Sons Holdings (K) Limited, P O Box 405-40404, Rongo. Telephone: 0720 862 439 / 0732 862 439. Email address: foursonsholdings@gmail.com**
2. **County Government of Migori, P O Box 195-40400, Suna-Migori. Email addresses: procurement@migori.go.ke / migoricountygov@gmail.com / countyattorney@migori.go.ke**

Dear Parties

CASE NUMBER 001 OF 2025: FOUR SONS HOLDINGS (K) LIMITED v COUNTY GOVERNMENT OF MIGORI
APPOINTMENT OF ARBITRAL TRIBUNAL

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Pursuant to Rule 7, and specifically Rule 7.3, of the Aluochier Dispute Resolution Arbitration Rules (ADRA Rules), the Institute hereby appoints an arbitral tribunal comprised of the following sole arbitrator – **Isaac Aluoch Polo Aluochier**, FCI Arb, of P O Box 436-40404, Rongo; Telephone: 0716446500 and email address aluochier@gmail.com.

**Yours faithfully
For and on behalf of
Aluochier Dispute Resolution**



**Isaac Aluochier
Chief Executive**

Aluochier Dispute Resolution

Arbitral Institution | Arbitration | Mediation

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KRA PIN: P052390407R*

31st January, 2025

**Isaac Aluochier, FCI Arb
P O Box 436-40404
Rongo**

Email: aluochier@gmail.com

Dear Mr Aluochier

**CASE NUMBER 001 OF 2025: FOUR SONS HOLDINGS (K) LIMITED v COUNTY
GOVERNMENT OF MIGORI
APPOINTMENT OF ARBITRAL TRIBUNAL**

Following a request for arbitration as provided for above, and your standing availability to act as an arbitrator for disputes administered by the arbitral institution, to facilitate formal appointment: 10

1. Please send us your written resume of your past and present professional positions, as required by rule 8.3.1 of the ADR Arbitration Rules;
2. Confirm that you agree to the rates on fees in accordance with the First Schedule of the ADR Arbitration Rules, as per rule 8.3.2; and
3. Declare to the effect that there are no circumstances known to you that are likely to give rise to any justifiable doubts as to your impartiality or independence, other than in any circumstances that you disclose in your declaration – as per rule 8.3.3.

I look forward to hearing from you shortly.

**Yours faithfully
For and on behalf of
Aluochier Dispute Resolution**



**Isaac Aluochier
Chief Executive**

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Isaac Aluochier

*FCI Arb, CPM
Arbitration | Mediation | Representation*

*P O Box 436-40404, Rongo, Kenya
Telephone: +254 716 446 500
aluochier@gmail.com | www.aluochier.co.ke*

31st January, 2025

**Aluochier Dispute Resolution
P O Box 436-40404
Rongo**

Email: info@aluochier.co.ke

Dear Sir

APPOINTMENT OF ARBITRATOR

CASE NUMBER 001 OF 2025: FOUR SONS HOLDINGS (K) LIMITED v COUNTY GOVERNMENT OF MIGORI

Further to your letter dated 31st January, 2025, attached to this letter of acceptance is my CV, pursuant to rule 8.3.1 of the ADR Arbitration Rules. I also agree to the rates on fees in accordance with the First Schedule of the ADR Arbitration Rules, as per rule 8.3.2.

Pursuant to rule 8.3.3, there are no circumstances known to me that are likely to give rise to any justifiable doubts as to my impartiality or independence.

I trust that I have furnished you with all the requisite information.

Yours sincerely



Isaac Aluochier, FCI Arb

Isaac Aluoch Polo Aluochier, FCI Arb, CPM

P O Box 436-40404, Rongo, Kenya

+254 716 446 500

aluochier@gmail.com

PROFILE AS AT JANUARY 2025

A Fellow of the London headquartered Chartered Institute of Arbitrators, the world's most reputable international association of professionals involved in disputes resolution, Aluochier is an effective disputes arbitrator, mediator, party representative, litigator, manager, consultant and incisive analyst producing excellent results in the fields of: disputes resolution – commercial, property, construction, employment, family, politics and governance, competition and co-operatives; construction project management; construction financial management; financial trading and investment fund management. These skills were developed in the disputes resolution, construction, and financial services industries over several years, in both the United Kingdom and Kenya.

WORK EXPERIENCE

DISPUTES RESOLUTION AND CONSTRUCTION INDUSTRY CONSULTANT

(Arbitration, Mediation, Litigation, Claims, Project Management and Construction Financial Management), *Kenya and United Kingdom*, from February 2003 to the present. Undertaken a broad range of activities spanning the entire spectrum of quantity surveying, commercial management, construction finance, claims and litigation consulting, and alternative disputes resolution for a number of clients, including the following highlights:

1. September 2018 to the present: *Alternative dispute resolution proceedings*. Predominantly succession – probate and inheritance, property, construction, and co-operatives disputes in Migori County, Kenya, and competition abuses in the refrigerated and controlled atmosphere containers industry in Kenya, involving the world's major international shipping lines.
2. June 2012 to the present: *Litigation proceedings*. Parties: Kenya state organs and officers, Kenya. Notable cases include, in the High Court, Court of Appeal and Supreme Court: successfully stopping the unconstitutional Building Bridges Initiative (BBI) constitutional change process championed by the President of Kenya and the former Prime Minister of Kenya – 2020 to 2022; successfully securing court orders affirming contravention of Chapter 6 of the Constitution of Kenya by a sitting President and Deputy President; contributing richly to Kenya's legal jurisprudence in presidential election petitions, constitutional conduct of State officers and public assets recovery arising from illegal conduct by public officers.
3. February 2012 to July 2012: *Project programming and quantity surveying*. Client: Gilbi Construction Co. Limited, Kenya. Project: Chania Gardens Housing Scheme, Kiboko, Thika, Kenya (New build residential development of about 136 semi-detached houses; USD 8.36 million).
4. November 2007 to May 2010: *Claims management and all aspects of quantity surveying*. Client: John Laing Partnership Limited, United Kingdom. Project: Chalkhill Combined Facilities Building, Wembley, Middlesex, United Kingdom (Mixed development including multi-storey residential flats, health centre, offices and a community centre; GBP 12.5 million).
5. August 2009 to September 2010: *Public private partnership (PPP) / private finance initiative (PFI) bidding, project finance arrangements and pre-construction set-up*. Client:

- Kenya Diaspora Limited, United Kingdom. Projects: mixed real estate developments including mass housing, commercial offices, educational, social and leisure facilities, and supporting road, water, drainage and electricity infrastructure, for 4 different projects in Nairobi, Kenya (Pangani: USD 70 million; Starehe: USD 70 million; Park Road: USD 35 million; and Kibera: USD 87 million).
6. June 2008 to October 2008: *Claims management and all aspects of quantity surveying*. Client: Stent Foundations Limited, United Kingdom. Project: Riverbank House, City of London (Offices; GBP 5 million).
 7. May 2005 to October 2007: *Quantity surveying – all aspects*. Client: Cubitt Building & Interiors Limited, United Kingdom. Projects: (a) Colchester Garrison, Colchester, Essex, United Kingdom (3 packages totalling GBP 10 million, part of a GBP 550 million PFI (private finance initiative) contract, new build; profitability improvement over target – about 4%); (b) 200 Aldersgate Street, London, United Kingdom (Toilet fit-out package, GBP 2.9 million, multi-storey office block refurbishment; estimated profitability improvement over target – about 3%); (c) 240 Regent Street, London, United Kingdom (Builderswork package, GBP 2.4 million, mixed retail and office block refurbishment; estimated profitability improvement over target – about 11%).
 8. May 2003 to June 2004: *Quantity surveying – all aspects*. Client: Conamar Building Services, United Kingdom. Projects: numerous projects ranging in value between GBP 5,000 and GBP 1 million.
 9. February 2003 to May 2003: *Quantity surveying – all aspects*. Client: McCabe Builders (UK) Limited, United Kingdom. Project: 15 Kean Street, WC2 (GBP 2.6 million; new build mixed offices and residential development, commercial client for offices and developer for residential apartments).

EMPLOYMENT

1. October 2001 to February 2003: *Contracts Manager/Quantity Surveyor/Estimator*. Company: T H Kenyon & Sons Plc, *England*.
2. June 2001 to September 2001: *Estimator*. Company: Michael Brady Limited, *England*.
3. December 1995 to September 2000: *Managing Director*. Company: Piedmont Limited, *England*, financial trading.
4. June 1994 to December 1995: *Chief Executive*. Companies: Fedha Multi-Purpose Co-operative Society Limited, *Kenya*, micro-finance; Polo Money Services Limited, *Kenya*, investment management.
5. 1993 to 1995: *Chief Executive*. Company: Polo Financial Reports, *Kenya*, financial analysis.
6. 1988 to 1991: *Assistant Quantity Surveyor*. Company: WT Partnership, *England*.

EDUCATION, TRAINING AND QUALIFICATIONS GAINED

1. Peace & Mediation Africa, Nairobi, *Kenya*; CPM
2. Chartered Institute of Arbitrators, London, *England*; FCI Arb.
3. Cranfield School of Management, Cranfield University, Bedford, *England*. MSc in Project Management.
4. Royal Institution of Chartered Surveyors, *England*. Test of Professional Competence.
5. Reading University, *England*. BSc (Hons) in Quantity Surveying.

ADDITIONAL INFORMATION

1. Highly computer literate in spreadsheets, word processing and project scheduling, in addition to a good working knowledge of most Windows and Android based programs.
2. Currently authoring two books: *Arbitration Revolution – Spearheaded from Kenya* and *Succession Arbitration in Kenya – Past, Present and Future*.

SIGNATURE

Isaac Aluochier