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KS/G/23/4244

8th February 2023

Mr. Abiaz Rwamiri,
The Public Relations Manager,
National Drug Authority,
Plot 19 Lumumba Avenue,
P.O BOX 23096,
KAMPALA.

Dear Sir,

RE: DEMAND NOTICE CUM NOTICE OF INTENTION TO SUE

We act for and on behalf of Pastor Robert Kayanja of Miracles center cathedral (hereinafter referred to as our Client') upon whose instructions we address you hereunder;

Our Client is the Founding and Senior Pastor at Miracle Center Cathedral, a well-respected senior citizen of Uganda with a national and international reputation.

We have been informed by Our Client that Mr. Abiaz Rwamiri you published defamatory remarks about Our Client through your Twitter Account @AbiazRwamiri on the 11th of January 2023 at 9:26 AM EAT while relying on video of one of Our Client's church sessions alleging that Our Client had stated that he 'has superpowers of killing ticks in animals' a statement that was not contained in the attached video. (Attached is the twitter publication and the Video collectively marked as annexure A)

That you republished the said defamatory tweet 5(Five) days later through your twitter handle @AbiazRwamiri. (Attached is the twitter publication marked as annexure B)

On the 7th of February 2023, as the Public Relations Manager of Uganda National Drug Authority you published a press release titled 'Counterfeit Tickoff Arcaricide being Promoted by Pastor Robert Kayanja' wherein you stated that 'Pastor Kayanja was using his advantaged position to lure desperate farmers and that his intention was not only criminal but also intended to cheat Ugandans, It was further alleged that over 100 samples had been impounded from his church stores and had tested positive of contamination with dangerous and

NATIONAL DRUG AUTHORITY REGISTRY	
Date Received	10/2/23
Time:	1645hr
Registry No.	985/23
Received by:	Daniel
Dept.	SA

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banned chemicals (Attached is the publication marked as annexure C).

Relying on this defamatory press release, several articles have been published in the Daily Monitor, Nile Post websites and social media platforms forms dated 7th February 2023 and 8th February 2023 with headlines 'Police, NDA raid Pastor Kayanja church, seize fake drugs' and 'Drug authority warns public over pastor Kayanja medicine. (Attached is the publications collectively marked as annexure D)

It should be noted that the contents in these articles were drawn from the defamatory allegations made in your press release to our Client's detriment.

These false statements alleging that Our Client is involved in '**production and distribution of counterfeit arcaricides**' were unfounded as Our Client is not a director or a shareholder of the product in issue and there was no report from NDA to confirm the said findings save for the tweets.

The said defamatory allegations were only intended to damage his reputation as a man of God among reasonable members of the society.

The defamatory tweets on your personal twitter account clearly shows that you had a personal vendetta against our client and it is only after being challenged by the public on twitter that an official statement was released on the 7th February 2023.

(a) Take note that the chemicals you referred to as banned by NDA are among the approved chemicals under the National Drug Register of Uganda - veterinary medicines April 2022 as explained below;

(i) Fipronil.

According to the NDA register, as of February 2022, Fipronil is actually an authorized active ingredient in pestigon (Fipronil 100MG) an approved drug for pesticide control Reg No. NDA/MAL/VDP/15949 made in Uk)

(ii) Benalaxyl.

There are a number of products registered with this as an active ingredient for example, DUOPIP 50:5% Reg. No. NDA/MAL/VDP/2 881 (Made in UK), PROTAID, NDA/MAL/VDP/5 982 (Made in Italy)

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(iii) DIAZINON

(b) Take further notice that by the time our client started interaction with NDA, he had earlier contacted a couple of laboratories both locally and internationally whose findings are contrary to Mr. Abiaz Rwamiri's statements.

It is therefore our conclusion that it is clearly malicious and defamatory that NDA has not shared their so called findings or report with our client or anyone else.

TAKE NOTICE that we hereby demand for the following;

(a) That you publically withdraw the said defamatory statements from your official Social Media Platforms inclusive of the twitter accounts within 72 hours from the date of issue of this notice.

(b) That you issue a public apology to Our Client both in the Daily Monitor News Paper and Nile Post Online News Platform as well as on all the Social Media Platforms where your defamatory statements were published within 72 hours from the date of issue of this notice.

(c) In the event that you fail to adhere to this demand, we have further instructions to institute legal proceedings against you for the recovery of compensation for the damage caused to Our Client's Reputation as a good standing person in society to your own peril and detriment.

STAND DULY WARNED!!!

Yours faithfully,

**FOR: MESSRS KATENDE, SSEMPEBWA AND COMPANY
ADVOCATES, SOLICITORS AND LEGAL CONSULTANTS**

TED/SES