

**THE REPUBLIC OF UGANDA**  
**IN THE HIGH COURT OF UGANDA AT KAMPALA**

**CIVIL DIVISION**

**MISCELLANEOUS CAUSE NO. 250 OF 2022**

**MUKULA SAM** \_\_\_\_\_ **APPLICANT**

**VERSUS**

- 1. CHRISTIAN LIFE MINISTRIES**
- 2. PASTOR JACKSON SSENYONGA**
- 3. WANYAMA IVAN**
- 4. OJULONG ALIAS PETER**
- 5. MAWANDA GEOFREY ALIAS KEFA**
- 6. WASSWA ISRAEL** \_\_\_\_\_ **RESPONDENTS**

**AFFIDAVIT IN REPLY**

I, **JACKSON SSENYONGA** C/O M/S Ojambo & Ojambo Advocates, Naigaga Complex, Plot 42, Luthuli Rise, Bugolobi, P.O. Box 21920, Kampala, affirm and state as follows:

1. That I am a male adult of sound mind, Lead/Head pastor of the 1<sup>st</sup> Respondent and I affirm this affidavit on my own behalf and on behalf of the 1<sup>st</sup> Respondent.
2. That I have perused the Notice of Motion of the Applicant dated 1<sup>st</sup> September 2022 together with the supporting affidavit of the Applicant of the same date and respond thereto as follows:
3. That the contents of the Notice of Motion application and the supporting affidavit are denied and the same shall be put to strict proof.
4. That neither the 1<sup>st</sup> Respondent nor I are employers of the 3<sup>rd</sup> to 6<sup>th</sup> Respondents as alleged in para 3 of the affidavit of the Applicant.
5. That in reply to para 4 & 5 & 6 of the affidavit of the Applicant, I state that the Applicant is unknown to me, and is not and has never been a member of the 1<sup>st</sup> Respondent church. Neither are the 3<sup>rd</sup> and 4<sup>th</sup> Respondents members of the 1<sup>st</sup> Respondent church. I challenge the Applicant to prove his alleged membership of the church since all members of the church are issued membership certificates.
6. That it is only the 5<sup>th</sup> and 6<sup>th</sup> Respondents who volunteer once in a while as usher and security help respectively on some days of large gatherings but have never been employed by the 1<sup>st</sup> Respondent or myself.

7. That in response to para 6 of the affidavit in support, I categorically state that there is no chapatti maker at the 1<sup>st</sup> Respondent church as alleged by the Applicant and further affirm that no one is allowed to sell any items or food at the church.
8. That in further response to para 6 of the affidavit in support I affirm that the 4<sup>th</sup> Respondent is not a member of the 1<sup>st</sup> Respondent's security team and the 6<sup>th</sup> Respondent is not the head of security in the 1<sup>st</sup> Respondent church and is not my personal body guard as alleged. I challenge the Applicant to furnish proof thereof.
9. That in response to para 9 & 10 of the affidavit of the Applicant I state that I never recorded or made the alleged statement attached as Annexure 'C' and affirm and or state that the signature on that statement is not my signature and that the statement is consequently a forgery and or fabrication. That I accordingly categorically deny the allegations in para 9 of the affidavit of the Applicant.
10. That I further categorically deny the allegations in para 10 of the affidavit of the Applicant and the same be subjected to strict proof thereof.
11. That the contents of para 11, 12, 13, 14, 15, 16, 17, 18, 19 are unknown to the 1<sup>st</sup> Respondent and I and were in any event, if at all, not committed by the 1<sup>st</sup> Respondent and I or with our authority.
12. That the claims in this application are alleged crimes which are personal in nature and as such the 1<sup>st</sup> Applicant and I cannot be held vicariously liable for criminal actions of the 3<sup>rd</sup> to 6<sup>th</sup> Respondents if at all.
13. That I have read through the judgment against the 3<sup>rd</sup> to 6<sup>th</sup> Respondents attached as annexure "B" to the application which judgment reveals that the 6<sup>th</sup> Respondent completely was not at the scene and was not stated to have robbed or to have beaten the Applicant and was only talked about at the police station.
14. That I have further upon being served with this application learnt that 5<sup>th</sup> and 6<sup>th</sup> Respondents have appealed against the said Judgment and conviction in the Court of Appeal.

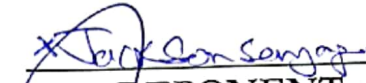
15. That para 20 is denied and I state that the application is malicious, frivolous and baseless and ought to be dismissed with costs.

16. That whatever is stated herein is true to the best of my knowledge and belief.

Dated at Kampala this 8 day of Apr 2023

Sworn this 8<sup>th</sup> day of Apr 2023

By JACKSON SSENKONGA

  
\_\_\_\_\_  
DEPONENT

Before me:

\_\_\_\_\_  
COMMISSIONER FOR OATHS

Drawn & filed by:

M/s Ojambo & Ojambo Advocates,

Naigaga Complex, Plot 42, Luthuli Rise, Bugolobi,

P.O.Box 21920, Kampala

