



SEBANJA
& CO. ADVOCATES

CHAMBERS

Plot No 47 Kampala Road
Mabuna Complex Level 6 Office AP11
PO Box 71190 Kampala
Tel +256752632393

Our Ref: SCA/18/01
Your Ref:.....

Date: 18th JANUARY, 2022

TO:

NAMEERE JUSTINE
(CEO) TM TV
MASAKA
P.O BOX 220043 – MASAKA

RE: **NOTICE - CUM- NOTICE OF INTENTION TO SUE**

WE act for and on behalf of Tushabe Bruce Nzabanita the president VOLUNTEER UGANDA EXTRA LTD here in referred to as our client on whose instructions we address you as here under as per the letter and the spirit of the subject herein above captioned but briefly in terms here below articulated for your consumption and most urgent attention.

1. That Tushabe Bruce Nzabanita is a president of Volunteer Uganda Extra Ltd a corporate "persona" (body) incorporated under the company Act 2012 Laws of Uganda encapsulated with the mandate *to fight corruption, protection of human rights, ensuring transparency and accountability of public funds, Legal protection and the rule of laws*. Our client as a president of volunteer Uganda, no doubt is a person of high moral character, with proven undisputable integrity and his name for the last couple of years has never had a dent.
2. That our client being a highly gifted orator, a renowned NRM mobiliser and political analyst, he was admired by the CEO TM TV and requested him to render TM TV services as presenter POLITICAL TALK SHOWS and on that account he was given an appointment to that effect dated 27th /10/2021 whose effective date is 1st Dec 2021 to date. However, TM TV station has never been on air although our client's contract with her is still running. It is a known fact and within the

knowledge of Nameere Justine (CEO) that at the time of executing a contract of employment with our client, he was still and still a serving officer at the position of president volunteer Uganda Extra Ltd.

3. To be precise and unfold the source of vendetta and the bad blood that is seemingly flowing between Tushabe Bruce Nzabanta and Nameere Justin even before they start to working together and for the public not to be misled and diverted, came as follows;

4. That on 17th January 2022 the **MM Advocates** (with no specific address) as agent of TM TV acting under the instructions of its CEO herein Madam (Nameere Justine) who contains the living soul of TM TV LTD issued illegal public notices on Whatsup as social media, publically damaging the respected reputation of our client, alleging he has been going around in public extorting money from the unsuspecting members of the public in the name of TM TV whereas it is within your knowledge that the allegations are baseless and untrue but only acting in bad faith as a mercenary to damage our clients good reputation. Surprisingly, even you personally involved in the same. How can anyone extort in the name of a TV that is not on air, no channel etc.

5. That Volunteer Uganda through a whistle Blower allegedly got information connected with corruption and abuse of office at Lwengo district local government wherein the former chief Administration office in collusion with the district engineer, district service commission made an illegal internal submission with intention of irregularly recruiting an assistant engineering officer in the names of **NAKIBUUKASULAINA** who was previously working with Lwengo on alleged contract as headman road gang(casual worker) whose contract had since expired and had already been appointed by Masaka District as assistant engineering officer.

6. That on the basis of that allegation volunteer Uganda wrote to the CAO for access to public information pursuant to Article 41 of the constitution and Access to

public information Act 2005 and its attendant regulations 2011 concerning illegal recruitment, a copy herein attached dated 28/12/2021. REF VUEL/GEN/255.

7. It is alleged that the impugned public officer that was intended to be illegally recruited herein **Nakibuuka sulaina** is allegedly a fiancée to a one Kayando Muas Bahat who has been confronting our client on many occasions claiming that he had failed his fiancée to get a job irregularly at Lwengo.
8. That on Friday madam Nameere Justine called our client several times between 8:00pm – 9:00pm and even sent several messages on workers whatsapp group for TM TV son 14th Jan 2022 calling him to meet at **solo Height Hotel Kyotera road Masaka City** wherein he could not meet you at night and you made an appointment to meet on the next day Saturday 15th January 2022 at your office at 1.30pm.
9. That on Saturday our client met you at your office, at TM TV at Kizunga Masaka City at 3:00pm as agreed in presence of Kayondo Musa Bahat although he did not have plans of meeting Kayondo Musa Bahat.
10. That Kayondo Musa Bahat had allegedly reported our client to Nameere Justine CEO TM TV reportedly being the employer to our client wanted to use employer - employee relationship and allegedly being a presidential adviser to the president and purportedly being a daughter to a minister wanted to duress him to withdraw the letter of access to public information volunteer Uganda had written to CAO on the recruitment of Nakibuuka Sulaina the alleged purported fiancée to Kayondo Musa Bahat who is alleged to be a friend to Nameere Justine.

The CAO had refused to sign the appointment letter of Nakibuka Sulayina because of alleged irregularities and illegalities complained about by Volunteer Uganda Extra and was still pending on his table this as the reason for causing forceful withdraw.

11. That when our client met you on Saturday at 3:00pm at your offices in presence of Kayondo Musa Bahati you unfairly and terribly duressed, forced/compelled our

client withdraw the letter volunteer Uganda had previously written to CAO Lwengo on the said alleged illegal recruitment which he ostensibly declined to comply with at your annoyance the reason being that the work of the organisation cannot be compromised with.

12. That we are concerned, bewildered and flabbergasted by the wanton conduct of Nameere Justine who is a person at such a level of leadership and management magnitude and to the extreme an allegedly appointed senior presidential advisor, to harbour intention of compromising corruption Acts and abuse of public office by alleged officials of Lwengo district in form of protecting illegal recruitment of public officer who is an alleged fiancée to Kayond Musa by irrationary issuing defamatory public notices over TM TV official employee in the names of Tushabe Bruce Nzabanita, in respect to extortion claims when it is within Your knowledge that you are doing it as a punishment / reward/ sanction for not withdrawing a claim in alleged corruption and abuse of office pertaining to illegal recruitment of a public officer connected to your friend.
13. We are reasonably informed that on several instances you have perpetuated harassment and threats on our client in all forms but most importantly claiming that being a presidential advisor and presumably an alleged daughter to the most respected and disciplined minister in this government honorable Bamulangaki Ssempijja you promised to put the life of our client at stake.
14. Without prejudice to the foregoing being a public official and an alleged daughter to the cabinet minister does not equip you with the locus to interfere with any persons rights to liberty and right to life. It does not justify your wanton conduct whatsoever in disturbing our client's peace by hurling all sorts of insults, threats and witch hunt. That you should bear in mind that the contract of employment between TM TV and our client is still running and no notice of termination has ever been communicated to him as provided in the terms of contract for that reason it still if force.
15. That you should be informed that despite Tushabe Bruce Zabanita being an employee of TM TV under your supervision the work of volunteer Uganda Extra limited is distinct from the work of TM TV and there should no over up and the

management of TM TV have no rights whatsoever to intermeddle or influence the practice of volunteer Uganda LTD

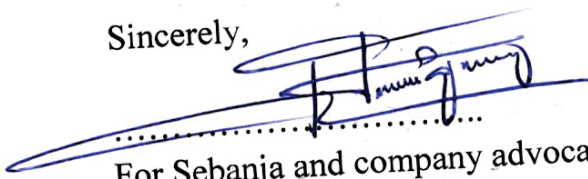
16. Finally but not least our client highly expects all this in pursuit of executing the mandate of the organization. However, it is regrettable that officers of government who would be giving a helping hand to enable the organization execute its mandate are the same people used to fight it. That notwithstanding, this will make the organization stronger.

TAKE NOTICE that you have been given 14 days from the date of receipt whereof to communicate an apology to our client, publicise in public media retracting /withdrawing you heinous and un justified allegations of extortion by our client in the name of TM TV, failure of which we have very strict instructions to institute both criminal and civil suit in defamation against you and your alleged agent MM advocates if she exists and TM TV in its corporate name and be condemned in paying colossal sums of money inform of damages to compensate our client for damaged reputation since your **actions were intended to bring hatred, ridicule and to demean/ lower the esteem of our client in the right thinking minds of the public.**

TAKE FURTHER NOTICE that, Legal redress shall be preferred at your c peril, cost and in addition to subjecting you to perpetual ridicule and public embarrassment.

Hoping for quick and positive response.

Sincerely,



For Sebanja and company advocates.

Cc . Office of the presidency.

Cc. INSPECTOR General of Government Masaka

Cc .CAO Lwengo.

Cc. Chairperson LC5 Lwengo.