# IN THE EAST AFRICAN COURT OF JUSTICE FIRST INSTANCE DIVISION AT ARUSHA

REFERENCE NO ...... OF 2023.

#### **BETWEEN**

SSEMAKULA ALI ABAAS	1ST APPLICANT
NYINAWUMUNTU LEATITIA	2 <sup>ND</sup> APPLICANT
[suing on their own behalf and representing all parties interested in and being past and present MasterCard Multicurrency cardholders with I&M Bank Rwanda Plc]	
AND	
ATTORNEY GENERAL OF RWANDA	RESPONDENT
I&M BANK (RWANDA)	1ST INTERVENOR
MASTER CARD (EAST AFRICA OFFICE)	2 <sup>ND</sup> INTERVENOR

(Under Articles 6(d), and 7(2), 8(1)(c), 23(1), 27(1), and 30(1) of the Treaty for the Establishment of the East African Community and Rules 1, 4, and 25 of the East African Court of Justice Rules of Procedure, 2019).

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DATED AT NAIROBI THIS......DAY OF......2023

# JOSEPH MCDONALD ADVOCATE FOR THE APPLICANT

Lodged in the Sub-Registry at Nairobi this.....day of......2023

# Registrar East African Court of Justice

## DRAWN AND FILED BY

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#### **I&M RWANDA**

I&M Bank Rwanda PLC KN 03 Avenue/ 9 Nyarugenge CBD Kigali, Rwanda APPENDIX ONE: LIST OF THE VICTIMS

## **APPENDIX ONE**

## LIST OF ALL VICTIMS IN THIS CASE

- 1. ABAYO PASCAL
- 2. ADUHIRE ELIANE
- 3. ANGELIQUE GAHONGAYIRE
- 4. ARIELLE LESLIE GAKUBA
- 5. ASSIEL MWIZERWA
- 6. BAMUKUNDE JANE
- 7. BOSCO GATETE
- 8. BUCYANA HAFIDH
- 9. BURORA RACHIDI
- 10. BYIRINGIRO ELYSE
- 11. CALEB TURATSINZE
- 12. CARINE KALINDA
- 13. CARINE UWASE
- 14. CHANTAL UWIZERA
- 15. CONFIANCE H KAREMERA
- 16. DANIEL IMANIRIHO
- 17. DANIEL NIYOGUSHIMWA
- 18. DAVID BYIRINGIRO
- 19. DAVIS MUGIRA
- 20. DIANE UWIDUHAYE
- 21. DIGNE BRIGITTE KAMUGIRE
- 22. DJADIDA UZAMUKUNDA
- 23. DJIHADI TUYISHIME
- 24. EMELYNE AISHA NYIRANDABARUTA
- 25. EMMANUEL DUSENGIMANA
- 26. EMMY MUDAHEMUKA
- 27. ERNESTINE UWABABYEYI
- 28. ESTHER MUTONI
- 29. FELICIEN NIYIGENA
- 30. FRANCINE UWIMPUHWE
- 31. FRANCOISE MAZIYANYANJA
- 32. GAKARA DJUMA HASSAN
- 33. GASANA UWICYEZA NICOLE
- 34. GATERA THEOGENE
- 35. GATO SAIDATH
- 36. GERARD MPOBERA
- 37. GILBERT MUNYANEZA
- 38. HAGABIMANA JEAN PIERRE
- 39. HAKIZIMANA ISMAIL
- 40. INES UMUBYEYI SENGOGA
- 41. IRADUKUNDA OLIVIER

- 42. JACQUELINE NSANZEMARIYA
- 43. JEAN DAMASCENE MBAZIMITIMA
- 44. JEAN DE DIEU NKAKA
- 45. JEAN MARIE MUTUYEYEZU
- 46. JEANNETTE MUTUYIMANA
- 47. KABARISA ASSOUMANI
- 48. KALINDA BRENDA
- 49. KALISA SWABUL
- 50. KAREMERA SULAIMAN NOURDIN
- 51. KAYINAMURA IBRAHIM
- 52. KUBWIMANA FABRICE
- 53. KWIZERA DELPHINE
- 54. LEODOMIR NSHIMIYIMANA
- 55. LEVIS IRADUKUNDA
- 56. MALUWA NISINGIZWE
- 57. MANZI OMAR
- 58. MAREKE RICHARD
- 59. MARIE GRACE AKIMANA
- 60. MARIE JOE UWIMANA
- 61. MARTIN KUBWIMANA
- 62. MATHIAS HABIMANA
- 63. MBABAZI ALINE
- 64. MUGISHA HIRWA FABRICE
- 65. MUGISHA SAMUEL
- 66. MUHIGIRWA BUSH WILSON
- 67. MUHIRE DAVID
- 68. MUKABALISA JOSEPHINE
- 69. MUKANDEKEZI WARDA
- 70. MUKARWEGO ALPHONSINE
- 71. MULINDABIGWI MUSAFIRI
- 72. MULINDWA YUSUFU
- 73. MULISA RAHM
- 74. MUNEZERO JOSETTE
- 75. MUNYENTWALI ARNAUD
- 76. MURANGWA ABDOUL AZIZ
- 77. MURARA ISMAEL
- 78. MUSHIMIYIMANA LUQMAN
- 79. MUSONI DIEUDONNE
- 80. MUTONI BRIDGET
- 81. MUTONI SINCERE
- 82. MUVUNYI LEE
- 83. NACKIMU RURANGIRWA
- 84. NADIA MUGUNGA
- 85. NADIA NASENGE
- 86. NADIA UWIMBABAZI

- 87. NDAYIZIGIYE ABDOUL RAHMAN
- 88. NDUWUMUREMYI ABDOU
- 89. NETO ABDULQAADIR
- 90. NIWEMUTONI NADINE
- 91. NIYIGENA PATRICK
- 92. NIYONTEGEREJE M EMMANUEL
- 93. NTIHEMUKA JUSTICE
- 94. NURDINE BYAGATONDA
- 95. NYINAWAMAHORO SUMAYA
- 96. NYINAWUMUNTU LEATITIA
- 97. NYIRAMAHIRWE SHAMIMU
- 98. NZAYISENGA MOUSSA
- 99. PASCALINE UWUMUKIZA
- 100. PATRICK ISHIMWE
- 101. PLACIDE NZAYISENGA
- 102. RADJABU MUKIZA
- 103. RUKUNDO DAHRY
- 104. RURANGIRWA ALI
- 105. RUSINE IRIZA CARMELLA
- 106. RUSINE SHEJA ORNELLA
- 107. RUTAYISIRE DIANE
- 108. RWASAMANZI AMON
- 109. RWEMERA NOE
- 110. SAIDI BARISHUKA
- 111. SAMUEL MANIRARUTA
- 112. SEBUHORO ABOUBAKAR
- 113. SERGE MUTUYIMANA
- 114. SHABAN MOHAMMED
- 115. SHEMA YASSIN HASSAN
- 116. SULAIMAN UWITONZE
- 117. SWAMADU UGIRASHEBUJA
- 118. TAKIA NALUGO
- 119. THIERRY UWAMURUTA
- 120. TUMUSIIME PASSY
- 121. TUYISENGE FRANCOISE
- 122. TWAHA BARIHENDA
- 123. UMUHOZA CLEMENTINE
- 124. UMURERWA MARY
- 125. UMUTESI ASSOUMINI
- 126. UMUTESI FILDAUS
- 127. UMUTONI DJANATI
- 128. UMUTONI NADJATI
- 129. UMUTONIWASE HASINA
- 130. UMUVANDIMWE SAUDA
- 131. UMWALI IHIRWE FRANCINE

- 132. UWIMANA UMUSALAMA
- 133. UWIMANIZANYE PASCASIE
- 134. UWITONZE ELYSE
- 135. UWIZEYIMANA SIFA
- 136. VESTINE TUYIZERE
- 137. WAGIRAYEZU YVES
- 138. WARDA JUMA HASSAN
- 139. XAVIER KANYANKORE
- 140. YEZABAYO BENJAMIN NESTOR
- 141. YVONNE TWAGIRAYEZU
- 142. ZUBAIRE NSHIMIYIMANA
- 143. KALISA OMAR
- 144. NYIRANKWANO FATUMA
- 145. UWIMANA RACHEL
- 146. KATABARWA OMAR
- 147. SAMALIYA ASIA
- 148. MUJAWIMANA JASMINI
- 149. NSANZIMFURA DEOGRATIAS
- 150. ISHEMA BEN VENUSTE
- 151. AFUWA NAIGA
- 152. NIBISHAKA EVERGISTE
- 153. NIYOMUFASHA ADJIRA
- 154. SSEMAKULA ALI ABAAS
- 155. NAMAKULA FATUMAH
- 156. RWIRIRIZA ISAAC
- 157. RYAHAMA GILBERT

	Device Number	
No.	(Masked)	NAMES
1	558995*****2580	ABAYO PASCAL
2	558995*****3521	ADUHIRE ELIANE
3	558995*****2654	AMUK INVESTMENTS LTD
4	558995*****2720	AMUK INVESTMENTS LTD
5	558995*****1185	ANGELIQUE GAHONGAYIRE
6	558995*****3083	ARIELLE LESLIE GAKUBA
7	558995*****3843	ASHLEY PAPETERIE LTD
8	558995*****3471	ASSIEL MWIZERWA
9	558995*****4693	BAMUKUNDE JANE
10	558995*****4031	BE FA LTD
11	558995*****2894	BLESSED BROTHERS LTD
12	558995*****2852	BLESSED EMPIRE LTD
13	558995*****2845	BLESSED GANGZ LTD
14	558995*****1368	BOSCO GATETE
15	558995*****4339	BUCYANA HAFIDH
16	558995*****9891	BURORA RACHIDI
17	558995*****2928	BURORA RACHIDI
18	558995*****3331	BYIRINGIRO ELYSE
19	558995*****7019	CALEB TURATSINZE
20	558995*****8546	CARINE KALINDA
21	558995*****0310	CARINE UWASE
22	558995*****0435	CHANTAL UWIZERA
23	558995*****8454	CONFIANCE H KAREMERA
24	558995*****0880	DANIEL IMANIRIHO
25	558995*****9049	DANIEL NIYOGUSHIMWA
26	558995*****0518	DAVID BYIRINGIRO
27	558995*****7043	DAVIS MUGIRA
28	558995*****4419	DIANE UWIDUHAYE
29	558995*****1048	DIGNE BRIGITTE KAMUGIRE
30	558995*****5586	DJADIDA UZAMUKUNDA
31	558995*****2150	DJIHADI TUYISHIME
32	558995*****8348	DM LOGISTICS LTD
		EMELYNE AISHA
33	558995*****1409	NYIRANDABARUTA
34	558995*****0831	EMMANUEL DUSENGIMANA
35	558995*****4453	EMMY MUDAHEMUKA
36	558995*****5039	ERNESTINE UWABABYEYI
37	558995*****1698	ESTHER MUTONI
38	558995*****2084	EXCELLERS GROUP LTD
39	558995*****7837	FELICIEN NIYIGENA

40	558995*****1037	FRANCINE UWIMPUHWE
41	558995*****8090	FRANCOISE MAZIYANYANJA
42	558995*****5823	GAKARA DJUMA HASSAN
43	558995*****3257	GASANA UWICYEZA NICOLE
44	558995*****5294	GATERA THEOGENE
45	558995*****4958	GATO SAIDATH
46	558995*****5897	GERARD MPOBERA
47	558995*****7225	GILBERT MUNYANEZA
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88	558995*****4941	MURANGWA ABDOUL AZIZ
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101	558995*****7571	NETO ABDULQAADIR
102	558995*****5666	NIWEMUTONI NADINE
103	558995*****3158	NIYIGENA PATRICK
104	558995*****6606	NIYONTEGEREJE M EMMANUEL
105	558995*****2770	NTIHEMUKA JUSTICE
106	558995*****0674	NURDINE BYAGATONDA
107	558995*****5005	NYINAWAMAHORO SUMAYA
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123	558995*****6531	SAMUEL MANIRARUTA

124	558995*****6136	SEBUHORO ABOUBAKAR
125	558995*****4511	SERGE MUTUYIMANA
126	558995*****2887	SHABAN MOHAMMED
127	558995*****3646	SHEMA YASSIN HASSAN
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134	558995*****6557	TWAHA BARIHENDA
135	558995*****2275	UGIRASHEBUJA SWAMADU
136	558995*****6391	UMUHOZA CLEMENTINE
137	558995*****4750	UMURERWA MARY
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152	558995*****8207	WARDA JUMA HASSAN
153	558995*****0781	XAVIER KANYANKORE
154	558995*****1086	YEZABAYO BENJAMIN NESTOR
155	558995*****9685	YVONNE TWAGIRAYEZU
156	558995*****6094	ZUBAIRE NSHIMIYIMANA

APPENDIX TWO: ASSESSMENT OF DAMAGES

# **Appendix Two-Assessment of Damages**

## 1. NZAYISENGA MOUSSA

## a) Confiscated properties

They emptied my electronic shop, they took: (200 telephone covers, 20 computer laptops, 12 headsets, 17 smart watches, 9 power banks, 4 external discs, many computer and telephone chargers, 4 modern wireless speakers, 5 wireless computer mouse, 24 Flash discs, 18 screen protectors, 6 new smart phones) (Value: 55,000\$)

## b) Mense profit

 My business of selling electronic equipment was completely closed in January 2023, in which I was making a profit of 3000\$ a month

## c) Emotional damage

 I was detained for 1 month and my family was scattered and because of losing my business, now I can't provide to my family anymore.

#### 2. KALISA OMAR

# a) Confiscated properties:

- He was forced to pay amount of 297,155 \$ to MasterCard escrow account in I&M bank.
- Money frozen on the Bank of Kigali USD account: 10,205\$.
- Money frozen on the Bank of Kigali RWF account: 5,010,000 RWF (Value: 4,900\$).
- A villa house, (UPI 1/02/09/02/8741) located at Kibagabaga, Kigali-Gasabo :(Value: 200,000\$).
- A car garage located at Muhima, Kigali-Nyarugenge: (Value: 70,000\$).
- Land, (UPI 1/03/01/02/4468) at Kigali, Kicukiro-Gahanga (Value: 15,000 \$).

## b) Mense profits

- They ruined my business of Mobile Money Transfer, Banking agencies (Cogebank, Bank of Kigali, Access bank, Equity bank, Ecobank), Western union, Moneygram, Irembo, Mobicash (Estimated profit Value in 6 months: 1,000\*30\*6 = 180,000\$)
- The breach of employees' contract: 3 employees (Contracts Value: 30,000\$)

## c) Emotional damages:

I was detained for 5 months without trial, I was separated from family for that period while my wife was pregnant, and I could not take care of my children (taking kids to school, taking my wife to hospital.

#### 3. UKARWEGO ALPHONSINE

#### a) Confiscated properties:

- Two lands UPI 1/02/01/04/1380 (Value: **20,000\$).**
- I was forced to pay 10,000\$ to MasterCard escrow account in I&M bank.
- My money was confiscated: (Value: **55,000\$).**

#### b) Mense profits

- They ruined my business of Mobile Money Transfer, Banking agencies (Cogebank, Bank of Kigali, Equity bank, Ecobank, BPR bank, Urwego Bank), Western union, Moneygram, (Estimated profit Value in 5 months: 600\*30\*5 = 90,000 \$)
- House rent due to displacement from January 2023 to June 2023:
   500\*6 = 3,000\$

#### c) Emotional damages:

 My family was scattered because my husband also got detained for two months without trial and our 3 years old son was left alone at home.

#### 4. MBABAZI ALINE

#### a) Confiscated properties:

- A land (UPI 5/01/11/04/5000) (Value: 5,000\$)
- Money in cash taken from my workplace 1,860,000 RWF (Value: 1,800\$)

#### b) Mense profits

- My business of banking agencies (Equity bank, Cogebanque, Mobile money) was completely put to an end (estimated profit for 6 months: 50\*30\*6 = 9,000 \$)
- My customer (creditor) has disappeared with my money: 1,900,000 RFW (Value: 1,850\$).
- I lost the renting cost of 3 months that I had paid for my working place (Value: 100\*3 = 300\$)

## c) Emotional damages:

- I was detained for 4 months and I left my brother's 3 years old daughter that I was taking care of, because her mother had gone to UN Peace Mission in South Sudan and the father was working far away from home.
- My mother, a genocide widow got psychological troubles because I was the one who Provides for her (Value: ..........)

#### 5. BURORA RACHIDI

## a) Confiscated properties:

- A house (UPI: 1/03/10/02/3402) located at Kanombe, Kigali-Kicukiro (Value: 80,000\$).
- House furniture: 2 sofa sets, dinning set, (Value: 6,000\$).
- Electronic equipment: Laptop and Samsung Smartphone (Value: **4,000\$).**
- Money frozen on MTN mobile money account: 686,843 RWF (Value: 650\$).

## b) Mense profits

- My two business partner (creditors) got away with an equivalent of 105,000\$.
- They ruined business of foods supply (Value for 6 months 'profit: 60,000\$)
- House rent due to displacement since January 2023: 1,000\$ per month.

#### c) Emotional damages:

 My family (pregnant wife and 2 years old daughter) was scattered, and because of that my wife suffered miscarriage (Value: .....).

## 6. MUKABALISA JOSEPHINE

#### a) Confiscated properties:

 I was forced to pay 60,681\$ to MasterCard escrow account in I&M bank.

#### b) Mense profits

 I was detained for 3 weeks and my business of imports and wholesale was closed for that period (estimated daily loss\* 21 days: 500\*21= 10,500 \$). I was put on stop list and I could not travel to import new products, because of that my business is struggling and I can't earn as it should be (estimated daily loss since March: 100\*30\*5 = 15,000\$)

## c) Emotional damages:

I have been detained for 3 weeks, my family was troubled, I was called fraudster and my reputation was tarnished as an entrepreneur who participates in legal tenders from public and private institutions, my trust to partners was broken (Value: ......)

#### 7. TUYIZERE VESTINE

#### a) Confiscated properties:

- House located in land: UPI 2/04/09/01/1209 (Value: 55,000\$)
- I was forced to pay 25,800 \$ to MasterCard escrow account in I&M bank.
- My house located in Huye district, was confiscated (Value: 50,000\$)

## b) Emotional damages:

I have been detained for 2 months, my family was troubled, I was called fraudster and my reputation was tarnished at my workplace and I was almost dismissed at my job (Value: .....).

## 8. MUNEZERO JOSETTE

#### a) Confiscated properties:

 I was forced to pay 25,621 \$ to MasterCard escrow account in I&M bank.

## b) Mense profits

- House rent due to displacement for January 2023: 500\$.
- I was put on stop list and I could not travel to import new products, because of that my business is struggling and I can't earn as it should be (estimated daily loss since March: 50\*30\*5 = 7,500\$).
- I lost my ticket to Dubai due to my flight dismissal (Value: 650\$)

## c) Emotional damages:

• My family was troubled, I was called fraudster and my reputation was tarnished as an entrepreneur who participates in legal tenders from public and private institutions, my trust to partners was broken (Value: ......).

#### 9. UWIZERA CHANTAL

## a) Confiscated properties:

 My house located at Kigali, Gasabo-Kinyinya district UPI 1/02/10/1310, was confiscated (Value: 47,000\$)

## b) Emotional damages:

• With 5 months old baby I have been detained for a week, my family was troubled, I was called fraudster and my reputation was tarnished at my workplace (Value: .....).

#### 10. UWIMPUHWE FRANCINE

## a) Mense profits

I completely lost my job (Monthly salary: 200\$)

#### b) Emotional damages:

• I was put in the prison for 7 months, and I was the main supporter in family, because I and my sister were both arrested, my mother got heart attack and she is in hospital since February 2023 up to now (Value: .....)

#### 11. MBAZIMITIMA DAMASCENE

## a) Mense profits

- I completely lost my job (Monthly salary: 500\$)
- The breach house (living house at Rubavu district) renting contract: 4 months' rent and 1 month (Value: 150\*5= 750 \$)

## b) Emotional damages:

• I left my family for 6 months, and they struggled because I was the one taking care of them (Value: .....)

#### 12. NIYIGENA FELICIEN

## a) Confiscated properties:

I was forced to pay: 8,433 \$ to MasterCard escrow account

#### b) Mense profits

I was detained for 3 weeks and my business of money transfers through Mobile money agencies (MPesa, MTN, Airtel Uganda, Airtel Congo ...) was closed for that period (estimated daily loss\* 21 days: 100\*21= 2,100 \$)

#### c) Emotional damages:

• I was called fraudster and my reputation was tarnished as an entrepreneur who works with different people, my trust to partners was broken (Value: ......).

#### 13. MANIRIHO DANIEL

## a) Confiscated properties:

My money was confiscated: (Value: 6,600\$)

#### b) Mense profits

- My business of Pork farming was shut down: Estimated profit Value in 6 months: (1,500\*5 = 7,500 \$).
- House rent due to displacement from January 2023 to June 2023:
   200\*6 = 1,200\$

# c) Emotional damages:

• I left my family in loneliness, my wife got arrested and questioned for my absence.

#### 14. NSHIMIYIMANA LEODOMIR

# a) Confiscated properties:

- Land (UPI 5/01/03/07/1877) located at Rwamagana district,
   Gishali sector (Value: 7,000\$)
- Land located at Rulindo district, Rutongo sector (Value: 2,000\$)
- Money in cash taken from me: 2,580,000 RWF Value: 2,450\$)

#### b) Mense profits

 I was detained for 4 months and my business of money transfers through Mobile money agencies (MPesa, MTN, Airtel Uganda, Airtel Congo, Vodacom congo ...) was closed for that period (estimated daily loss\* 30\*4: 30\*30\*4= 3,600 \$)

## c) Emotional damages:

- I was detained for 4 months where I was denied to talk to my family and my lawyers.
- I was called fraudster and I lost my trust to my partners (Value: .....)

#### 15. KALINDA BRENDA

#### a) Emotional damages:

- I was summoned and questioned.
- I was called a fraudster and accomplice in terror activities, due to that, my reputation was ruined at my workplace and got suspended for a week on my work responsibilities.
- My trust to workmates was broken (Value: .....).

#### 16. KALINDA CARINE

## a) Mense profits

 Living allowances since February 2023, due to overstay abroad after finishing my studies because I couldn't go back home fearing to be arrested (Daily living allowances: 50\*30\*6 = 9,000\$).

# 17. GAHONGAYIRE ANGELIQUE

## a) Mense profits

- House rent due to displacement from January 2023 to June 2023: 400\*6 = 2,400\$.
- I sold phone and didn't collect the payment (Price: 300\$)
- My friend who had my money disappeared with it (Value: 5,000\$).

## b) Emotional damages:

- My family was disappointed when RIB informed them that I funded a terrorist group and engaged in criminal activities.
- It has caused the lack of emotional intelligence that has negatively impacted my performance in the workplace.
- I didn't attend the team building in Zanzibar (happened in June) due to being on the travel ban list, which restricted me from leaving the country.

- I missed several in-person meeting with my colleague (workmates) from abroad due to my fear of going outside.
- This situation has greatly diminished my sense of patriotism as I am unable to perceive any justice emanating from my beloved motherland.
- I experienced a period of depression during which I found myself in a vulnerable state, leading me to contemplate and attempt to take my own life.

#### 18. MANIRARUTA SAMUEL

## a) Confiscated properties

- I was forced to pay **4,225**\$ onto the MasterCard escrow account as it was ordered by I&M bank Rwanda Plc.
- An amount of 112,000FRW equivalent to 100\$ is till now blocked on my MTN mobile money account since January.

## b) Mense profit

 I couldn't do my work/business due to this chaos since February till April of which I was earning 1,500\$ per month (a total of 2 months = 3,000\$)

## c) Emotional damages

 Family financial discomfort due to the card and MTN blockage with my money on it plus being detained without trial for 2 months hence not being there for my family when they needed me most.

#### 19. NYIRANDABARUTA AISHA EMILYNE

## a) Confiscated properties

- I was forced to pay 10,025\$ onto the MasterCard escrow account as it was ordered by I&M bank Rwanda.
- An amount of 107,141FRW equivalent to 100\$ is till now blocked on my MTN mobile money account since January.

#### b) Mense profit

• My business stalled for the period I was detained for two months' trial, because of this, I couldn't earn the 6,000\$ per month I used to earn hence a total of 12,000\$ for those 2 month of detention.

## c) Emotional damage

• My family and business fell apart since my husband and I were not able to be there for our children through this chaotic period and till now my husband can't be see. Financial chaos throughout this period and still going on.

# **20. MULISA RAHM JIBRIL**

## a) Confiscated properties

- Mercedes Benz car: RAG 092 G (Value: 22,000\$)
- Mercedes Benz car: RAG 958 E (Value: 22,000\$)
- Range Rover car (Value: 30,000\$)
- House located in land: UPI 1/02/06/06/918 (Value: 150,000\$)
- Money in cash taken on my arrest; 5,900 \$, 130,000 Rwf (Value: 6,000 \$)
- Telephone one plus 10 Pro (Value: 650 \$).
- Telephone Samsung Galax note 20 (Value: 540\$).
- 4 HP laptop (Value: 1,100 \*4 = 4,400\$).

#### 21. SHABAN MOHAMMED

# a) Confiscated properties

- My Mercedes Benz E class (Valued: 35,000\$)
- My family house got searched and 6,000\$
- Laptop valued at 1,000\$

#### b) Mense profit

- I lost a job of 500\$ per month since January till now due to this MasterCard and I&M.
- I have been out of the country since then till now I am spending
   2,000\$ per month on rents and food and it is still on going.

## c) Emotional damage

 Being out of your home country not able to go back sucks to the extent of feeling sad and depressed.

#### 22. SHEMA YASSIN HASSAN

## a) Confiscated properties

- Two land titles worthy a total of **130,000**\$ were confiscated and my 3 bank accounts were frozen together with mobile money account all worthy **5,000**\$.
- Tickets for the holidays worthy 4,000\$ was rendered passive.

## b) Emotion damage

 Having not been able to go back to my parents for school holidays sicken me deep to the nerves. This has led to failure of my campus tests hence the retakes.

#### 23. KABALISA ASSOUMANI

## a) Confiscated properties

- My land title in Kigali valued at 3,000\$ was confiscated and taken.
- My Equity Bank account is blocked with fifteen million RWF on it (Value: 14,000\$)
- My MTN Money account is blocked with 12,000,000RWF on it (Value: 11,000\$)
- My house searched and a total of 5,000\$ was taken.

## b) Mense profit

- My business of cattle plus a job both were earning me an outstanding profit of 4,000\$ per month, and this stop since February and still on going.
- A total expenditure of **4,500**\$ per month is still ongoing since then.

#### c) Emotional damage

 My family got scattered/fell apart due to this whole scenario and can't go back to my family house.

#### 24. RURANGIRWA ALI

#### a) Confiscated properties

 Blockage of my mobile money account with 250,000Frw equivalent to 240\$ by then.

#### b) Mense profit

- My business fell apart since then (January) till now, I was able to get a profit of 10,000\$ per month.
- I have been subjected to an outstanding monthly expenditure of 4,000\$.

## c) Emotional damage

• The situation has forced me to leave without my family which has triggered insomnia and mild headache.

## **25. UWITONZE ELYSE**

## a) Confiscated properties

 I was ordered to pay 2,796,000Frw and 346,936Frw on to master card escrow account in the I&M bank Plc Rwanda (This sums up equivalent to a total of 2,900\$)

## b) Mense profit

- My income of 3,500\$ per month wasn't achieved due to the 2 month detention.
- My business fell apart due this chaos.

# c) Emotional damage

 My image got spoiled which has rendered me a low esteem in the society.

#### 26. HAKIZIMANA ISMAEL

## a) Confiscated properties

- My HOWO Truck car was confiscated (Valued: 55,000\$)
- My I&M bank account got frozen with 6 million Rwf (Equivalent to 5,600\$)

## b) Mense profit

• I have been detained since January till now, I have been able to earn an income of **2,500\$** per month.

## c) Emotional damage

• I have been experiencing an intermittent insomnia, mental stress and nausea since my detention without trial for 3 month and ongoing bail denial resulted in low esteem mental disturbance.

#### 27. A COUPLE OF GASANA UWICYEZA NICOLE & NIYIGENA PATRICK

## a) Confiscated properties

- A villa house in Kibagabaga Kigali with a land title of 1/02/09/02/8649 (Valued at 300,000\$), all the house furniture, 2 laptops utensils plus everything in the house were taken (This coup was getting married in February) hence everything in the house was having an outstanding total value at around 28 million (value: 26,500\$).
- Two Kigali land titles 1/01/03/03/5138 and 1/01/03/03/5139 were confiscated having a total value of **86,000\$**.

• GASANA U. NICOLE was forced 45 million Rwf and my husband to be was forced to pay 20 million Rwf hence a total of 65 million Rwf equivalent to **62,000\$** by then.

## b) Mense profit

- The bride (got detained for 2 months) was earning **3,000\$** per month and the bridegroom (is still detained since January 2023) was earning **4,500\$** per month.
- The payment of the marriage preparations like the host place plus food and beverages which sum up to 7,000\$ nonrefundable.

# c) Emotional damage

• Due to the fact that our marriage was set to be in February 2023, the bride suffered depression after the disappointment and low social confidence. The bridegroom is still now going into mental disturbances that include insomnia and mild intermittent headaches since then.

#### 28. IRADUKUNDA LEVIS

## a) Confiscated properties:

- My money was confiscated: (Value: 13,000\$).
- They took all home materials and furniture from the house we lived in with my family (Value: 5000\$).
- They took Samsung S22 ultra (Value: 2,000\$).

#### b) Mense profits

- My education stopped as I was in jail (value ......)
- Lost business as I was in jail for over 6 month my customers couldn't find me and lost trust (Value: 10,000\$)
- Business house rented from January 2023 to June 2023: 200\*6 = 1,200\$.

## c) Emotional damages:

- I left my family with no help as I was the one who had a job and taking care of them and they stayed in loneliness for over 6 months (Value:..).
- I was detained for 6 months where I was denied to talk to my family and my lawyers.

## 29. RUSINE IRIZA CARNELLA & RUSINE SHEJA ORNELLA (SISTERS)

#### a) Confiscated properties:

- My money was confiscated on my MTN sim card (Carnella's): (Value: 19,000\$).
- Our father's car was taken HYUNDAI/Tcsn plate number RAG947F (Value: 17,000\$).
- Liquid money (Ornella's); (Value: 5000\$).
- Our father's phone Samsung S22plus (Value: 1500\$).
- Our families 2 HOUSES (Value: 160,000\$).

#### b) Mense profit

- Carnella stopped my university studies in middle, second year as I had to leave the country in order not to be jailed (Value: ......)
- Ornella didn't enroll/join university and lost my scholarship as I had to flee the country (Value: .....)
- Ornella lost my job as I left the country (Value: 400\$\*x months=....)

## c) Emotional damages:

- Being called a thief and fraudster and even terrorist supporter, it's terrifying and being welcome in the society again can't be the same from the students and even neighbors (value:...).
- It has affected us mentally to leave our parents for over 6 months.

#### 30. HIRWA MUGISHA FABRICE

#### a) Confiscated properties

- My land UPI 1/01/05/06/2021 Valued at 80,000\$ was confiscated.
- My MTN mobile money account is blocked with a value of 550\$.

## b) Mense profit

I was detained since January till now which rendered my 3,000\$ monthly income impossible.

## c) Emotional damage

 Having detained for 3 months without trial plus denial of bail thereafter with this ongoing long lasting detention has triggered insomnia plus low self-esteem.

#### 31. MWIZERWA ASSIEL

## a) Confiscated properties

- My two confiscated Kigali land titles with UPI 1/01/03/03/5140 and 1/03/03/5141 both value a total of 40,000\$.
- My big printer plus 3 new laptops and a sum sang galaxy note 20 were forcefully taken all value a total of **17,000\$**.

## b) Mense profit

• I was able to earn **3,400\$** per month, I could do so since the January detention till now.

# c) Emotional damage

 A 3-month detention without plus a complete bail denial are enough to leave a considerable mark both in the heart plus mind (detention still on course).

#### 32. ABAYO PASCAL

## a) Confiscated properties

 My 4,500\$ was confiscated cash and my mobile money account is frozen since February with an equivalent of 1,600\$ on it in Rwf.

## b) Mense profit

 My daily business was crippled since January, I was earning 2,000\$ monthly and till now I'm still in prison after bail denial on my side.

## c) Emotional damage

 I was detained without trial for 3 months, and the ongoing bail denial both has left me with mental discomfort plus skin diseases from the detention centers. Bail denial ongoing hence the detention.

#### 33. MUTUYIMANA SERGE

#### a) Confiscated properties

 They invaded and took everything in my liquor store valued at 30,000\$.

## b) Mense profit

• I got detained for three without trial and so my business couldn't go ahead of which my monthly income is **3,500\$** which is a total of **10,500\$** for the 3 months' absence.

## c) Emotional damage

 This 3-month detention without trial plus the current ongoing bail denial has left me with depression and heart discomfort. The detention still on going.

#### 34. NSHIMIYIMANA ZUBAIRE

## a) Confiscated properties

 They confiscated everything in my living room all worthy 1,500\$.

## b) Mense profit

 I am detained since January till now, I used to earn 1,500\$ per month.

# c) Emotional damage

• I have suffered mental nightmare discomfort since the unlawful detention from January plus the ongoing bail denial. A complete total nightmare.

#### 35. SEBUHORO ABUBAKAR

#### a) Confiscated properties

 My 6,000\$ cash was confiscated cash after house searched without court order.

## b) Mense profit

I was detained for 5 months hence a staggering loss of 12,500\$.

#### c) Emotional damage

• The first 3 months without trial instigated maximum fear through our mind.

#### **36. GAKARA JUMA HASSAN**

#### a) Emotional damage

 Being put on an immigration stop list has pushed me away from my parents which is rendering my social status week.

#### **37. NIWEMUTONI NADINE**

#### a) Mense profit

• I lost my job that has an income of **1,000\$** monthly due to this terrified moment where this lasted for 5 months.

## b) Emotional damage

This chaotic life altered my fertility cycle and terrified my life.

#### 38. MUSHIMIYIMANA LUQMAN

## a) Mense profit

I was having an income of 250\$ monthly hence a total of 1,250\$ passed me by.

# b) Emotional damage

- I was jailed for 4 months in very crowded jail where I caught up tuberculosis, and I am on treatment since my release time.
- It was in fact due to this TB that I got bail out.

## 39. NYINAWUMUNTU LEATITIA

## a) Confiscated properties

My 3,700\$ was confiscated cash.

#### b) Emotional damage

• I experience a terrifying moment.

#### 40. NSANZEMARIYA JACQUELINE

## a) Confiscated properties

- My **3,000**\$ was confiscated cash and bank plus mobile money accounts were frozen with a total equivalent amount of **5,000**\$.
- My iPhone 14 pro Max valued at 2,000\$ was confiscated.

#### b) Mense profit

■ I was earning 800\$ monthly hence a total of 4,000\$ was not earned due to the 5 months' detention.

## c) Emotional damage

Three months' detention without trial havoc plus being a duodenal ulcers patient and bail denial gave a big room to depression and stress.

#### 41. SHEMA FAWAZI

## a) Confiscated properties

 My 4,500\$ was confiscated and my father's land title worthy 8,000\$ was confiscated.

#### b) Mense profit

• I was earning **1,000\$** monthly, I was detained for 5 months hence a loss of **5,000\$** due to the absence from the business.

## c) Emotional damage

• I was detained for 3 months without trial plus 2 months after, this was overwhelmingly burdensome in my mind which resulted in loss of appetite with insomnia.

#### 42. GATETE BOSCO

#### a) Mense profit

- I was earning **850\$** monthly hence a total loss of **4,250\$** due the 5 months' absence from my business.
- I was having 2 lawyers that costed me and my family a total of 2,400\$ so far.

## b) Emotional damage

 The feel disgraced in front of my family because I feel like I dragged them into this chaos since they were there for me since January.

#### 43. HABIMANA MATHIAS

## a) Confiscated properties

 My MTN mobile account is blocked till now with 4,800\$ valued from the RWF amount since February.

## b) Mense profit

 I was having an income of 1,600\$ per months, I was detained for 4 months, thus a total of 6,400\$.

#### c) Emotional damage

 My 7-year-old daughter was violated (raped) during the time during this 4-year detention, it was me that was taking and getting her to and fro to school.

## 44. NETO ALI ABDULQAADIR

## a) Mense profit

• The 4-year detention led to a loss of **2,000**\$ for that period of absence since I was getting **500**\$ monthly.

# b) Emotional damage

 My image was tarnished, hence low society interactions due this injustice of 3 months' detention without trial plus one month of bail denial.

#### 45. MURARA ISMAIL

# a) Confiscated properties

My land title was confiscated worthy 5,000\$.

## b) Mense profit

I was detained for a total of 4 months and I was earning 400\$ monthly hence a total of 1,600\$.

## c) Emotional damage

• I was left in fear for this unlawful detention without trial.

#### **46. UMURERWA MARY**

## a) Mense profit

• I was earning 550\$ monthly hence a total of 2,750\$ was lost during the unlawful 4 months' detention.

## b) Emotional damage

• The 3 months' detention without trial instilled fear and luck of safety.

#### **47. MULINDWA YUSUF**

#### a) Confiscated properties

- My house furniture was confiscated worthy 4,000\$.
- They confiscated my 12,800\$ cash.

## b) Mense profit

 I was detained for 5 months hence a total loss of 20,000\$ due to the absence.

## c) Emotional damage

 Detaining an innocent man for 5 months straight and bail denial on the same person usually touches someone's mind heavily, hence it did.

#### 48. UWIMBABAZI NADIA

## a) Mense profit

 I was earning 400\$ monthly hence a total of 2,000\$ was lost due to the 5 months' absence.

## b) Emotional damage

• The fact that I was denied bail after the 3 months' detention without trial knowing fully that I was fully experiencing injustice plus the 2 more months of detention to get bail, this is still haunting me.

#### 49. UWIMANA UMUSALAM

## a) Mense profit

• I was detained for 5 months hence missing 2 college semesters worthy **4,200\$**.

# b) Emotional damage

 I was showered with fear since this outbreak sincerely, since day one till now I feel unsecured.

#### **50. BARIHENDA TWAHA**

## a) Confiscated properties

My house furniture were confiscated worthy 2,000\$.

## b) Mense profit

• I was detained for 5 months hence missing a chance to make a total **3,000\$** in these months since I was making **600\$** monthly.

## c) Emotional damage

Fear was instigated into my whole family till now.

#### 51. NYINAWAMAHORO SUMAYA

#### a) Mense profit

• 5 months' detention cost me a total of **6,500\$** including lawyer payment plus the monthly earning.

## b) Emotional damage

• Life in the detention centers has triggered fear in my heart since the first day in them.

#### **52. TUYISENGE FRANCOISE**

# a) Mense profit

• I was earning **1,200\$** monthly hence a total of **6,000\$** was lost due to the 5 months' detention.

# b) Emotional damage

I honestly lost trustworthy in front of my business partners.

#### 53. ISHEMA BEN VENUSTE

#### a) Confiscated properties:

- Land located in Bugesera district UPI 5/07/09/02/4738 (Estimated value of **20,000 USD**).
- TOYOTA/VAN RAG780F of Ishema Ben Venuste, with estimated value of **16,000 USD**.
- Fridge, Gas cooker, 2 beds, dinning set, 7 seats sofa, clothes, shoes, utensils, and all house equipment of an estimated total value of **16,000 USD**.

## b) Mense Profit:

- They breached house (living house at Kigali, Kicukiro, Kagarama) renting contract: 6 months' rent and 2 months' deposit with value of 1,000 \$.
- They fired my paid home maid: 6 months payment, (Monthly salary: 50\*6= 300\$).
- The breach office (Kigali, Nyarugenge, M Peace Plaza) renting contract: 5 months' rent and 2 months deposit (value **2,450** \$).
- I have lost my office furniture (Kigali, Nyarugenge, M Peace Plaza), was confiscated by the landlord because I went missing and left them in his house (Value: 5,900\$).
- The breach office (DRC-Goma, Quartier BDGL) renting contract: 7 months' rent (Value **2,800** \$).

- I have lost my office furniture (DRC-Goma, Quartier BDGL), was confiscated by Landlord because I went missing and left them in his house (Value: 4,200 \$).
- House rent due to displacement since January 2023: 1,500\$ per month.
- I have lost a car, hyunda KIA K5 2013, RAD 435K, I lent it to a friend and he disappeared with it (Value: **12,000\$)**.
- I have lost a car, hyundai KIA K7 2016 I have order from South Korea because I couldn't follow up (Value: 17,000 \$).
- I have lost a car, hyundai KIA K5 2014 I have order from South Korea because I couldn't follow up (Value: **10,000** \$).
- My business of trading usdt in DRC, ZAMBIA AND Rwanda was shut down because I couldn't do business while I was hiding and two of my staff were detained and one has exiled (Estimated daily loss for 6 months: 550\*30\*6 = 99,000 \$).
- Two of my customers (creditors) have disappeared with my money that I couldn't do follow up on them (value: **76,000\$).**

## c) Emotional damages:

• I was away from my family since January 2023, I was called a fraudster and my trust to my partners and family members was broken, I was accused to betray my sisters, my cousins, my brother, and my friends who were arrested in this case, so my families were scattered (Value: .....)

## 54. UZAMUKUNDA DJADIDAH

#### a) Mense profit

 I was having a monthly income of 400\$ hence a total loss of 2,000\$ due to the 5 months detention.

## b) Emotional damage

I left stressed and depressed.

#### 55. UWAMURUTA THIERRY

## a) Confiscated properties

Land title UPI 2/04/14/04/446 valued at 4,000\$ was confiscated.

## b) Mense profit

• I was detained without trial for one month, I was earning 700\$ monthly.

## c) Emotional damage

 Being accused of fraud together with the money bank agent services I offer has triggered low trust from my customers which triggers mental discomfort.

## **56. XAVIER KANYENKORE**

## a) Emotional damage

• Fear is still running through my body because being summons of what I didn't know.

#### **57. ADUHIRE ELIANE**

## a) Mense profit

• I was getting an income of **600\$** monthly hence a total of 3,000\$ for the 5 months detention.

# b) Emotional damage

• I was left terrified and stressed.

#### 58. ALIERRE LESLIE GAKUBA

## a) Mense profit

• I would have earned a total of 3,000\$ if I was not detained.

## b) Emotional damage

I experienced terrorism accusations.

## 59. BAMUKUNDE JANE

## a) Confiscated properties

• My money was confiscated **1,700\$.** 

## b) Mense profit

I could not do my job because of the 4 months detention of which
I was earning 750\$ monthly hence a total of 3,000\$ for the
absence.

# c) Emotional damage

• I was detained for 3 months without trial. This has left me sunk in bottom in my courage and low esteem.

#### **60. BUCYANA HAFIDH**

# a) Confiscated properties

• An equivalent of **700**\$ was frozen on my mobile money account.

#### b) Mense profit

A loss of my plane tickets to home country Rwanda, total = 2,600\$

## c) Emotional damage

 Spending a year without going back home because of this chaos is honestly terrifying.

#### **61. BYIRINGIRO ELYSE**

## a) Mense profit

• I left everything behind where I was earning 2,200\$ monthly, it couldn't go my way since January.

## b) Emotional damage

Mental distress is so far haunting me.

#### **62. CALEB TURATSINZE**

#### a) Mense profit

I was earning 2,700\$ monthly hence a total loss of 13,500\$ for the
 5 months detention.

## b) Emotional damage

 I suffered mental harassment due to bail denial on an innocent guy.

#### **63. CARINE UWASE**

## a) Mense profit

 My monthly earning of 800\$ was distorted hence a total of 4,000\$ loss so far.

## b) Emotional damage

Intermittent stress has been governing my life since then.

#### 64. CONFIANCE H KAREMERA

# a) Confiscated properties:

- Money in cash taken from my workplace 8,937,000Rwf (Estimated \$7,900).
- Money frozen on Mobile money 573,000Rwf estimated (\$500) with Telephone worth \$600.

#### b) Mense profits

 I lost my job in five months, monthly salary worth \$200 (5\*200= \$1,000).

#### c) Emotional damages:

- I was detained hence separated from my family for 5 months and they struggled for living because I wasn't contributing.
- I was called fraudster and terrorist, my reputation was tarnished and my colleagues in church no longer trust me.

#### 65. DANIEL NIYOGUSHIMWA

## a) Confiscated properties:

 Money frozen on Mobile money 170,000Rwf estimated (\$160) and cash taken from me 400,000Rwf equivalent to 370\$ by then.

#### b) Mense profits

- My business of restaurant went in loss because I was the manager and the owner
- I lost my customers from Japan embassy and I lost the partners (eg; vuba vuba) because I can't respond to their orders (I lost income estimated 7,500,000Rwf (\$7,300)

 My wife lost her job because I was in custody for five months, salary 300,000 Rwf (300,000\*5=1,500,000Rwf) equivalent to 1,400\$.

# c) Emotional damages:

- I was detained for 5 months without trial, I was separated from family for that period, and I could not take care of my kid and my wife.
- I wasn't able to take care of my mother who is old enough.

#### 66. DAVIS MUGIRA

# a) Mense profit

• The earning of 1,500\$ monthly was ceased due to this chaos, hence a 7,500\$ loss for this 5 months.

# b) Emotional damage

• Low esteem has characterized me since then.

#### 67. DJIHADI TUYISHIME

# a) Mense profit

• I was having an income of 1,200\$ monthly hence a total loss of 7,200\$ so far since then.

# b) Emotional damage

 Being not able to visit my parents has triggered mental sickness during this exile.

#### 68. EMMANUEL DUSENGIMANA

# a) Confiscated properties

My money was confiscated value of 250\$.

# b) Mense profit

• I was detained for 2 months hence not earning a total of 600\$.

# c) Emotional damage

 I was detained without trial for 2 months where I left behind a nursing wife which touched heavily my nerves since then.

#### 69. EMMY MUDAHEMUKA

# a) Mense profit

I was earning 950\$ monthly hence a total loss of 4,750\$ in those
 5 months of hunting people down.

#### b) Emotional damage

I was victimized for nothing, this has lowered my esteem.

#### 70. ERNESTINE UWABABYEYI

#### a) Mense profit

My monthly earning of 600\$ was compromised in a way that I lost a total of 3,000\$ in these last 5 months of meandering around.

# 71. HAGABIMANA JEAN PIERRE

# a) Confiscated properties:

 Money frozen on MTN mobile money account: 450,000 RWF (Value: 430).

# b) Mense profits

- My business of money transfer (Bank agents, western union, MoneyGram, RIA, mobile money, M-pesa) was closed in six months \$2,000 per month (6\*2,000= \$12,000).
- I lost my airplane tickets of \$400 from Dubai to Kigali because of flight cancellation.
- House rent due to displacement since January 2023 up to now:
   1,000\$ per month.
- House rent for workplace without working since January 2023 up now, \$300 per month.
- House rent for place of living in Kigali \$200 per month, since January 2023 up to now.

#### c) Emotional damages:

- I was in university and I deserted from my studies.
- I lost all my customers and my partners.
- I was called fraudster and my reputation was tarnished and I was not able to take care for my family.
- I was preparing my marriage and all plans were scattered since my fiancé also left me because of dangerous felonies I was accused of.

#### 72. MAREKE RICHARD

# a) Confiscated properties

Mercedes Benz car/C200 RAD 791G (Value: 21,000\$)

# b) Mense profit

- House rent due to displacement since January 2023: 1,000\$ per month
- I left my job which was giving me salary of 750\$ a month.

#### c) Emotional damage

• I exiled because of fear of going to prison, due to that I left my family which is suffering from my absence and my contribution to their living.

#### 73. MARIE JOE UWIMANA

# a) Confiscated properties

- My 2,700\$ was confiscated and a RG 059X motocycle model HAUJUE valued at 4,600\$.
- They confiscated my 3 land titles UPI 1/02/14/07/7811, UPI 1/03/02/04/8652 and UPI 1/03/02/04/8653 all 3 are totally valued at a sum of 40,000\$.
- My iPhone 14 pro Max valued at 2,000\$.

# b) Mense profit

• My monthly income is 4,000\$, I was detained for 4 month hence a total of 16,000\$ wasn't got.

#### c) Emotional damage

• The 3 months detention without trial created havoc is my mind to the extent that going out in the public is yet to restore, the fear is high.

#### 74. MARTIN KUBWIMANA

#### a) Confiscated properties:

 Money frozen on MTN mobile money account 270,000 Rwf (\$200).

# b) Mense profits

- I left my job since January 2023; monthly salary was 150\$
- House rent due to displacement 100\$ per month since January 2023 up to now.

# c) Emotional damages:

- My school was canceled as student at ELRP.
- I was called fraudster and my reputation was tarnished which destroyed my relationship with friends and family members.

#### 75. MUNYENTWALI ARNAUD

# a) Confiscated properties

My Samsung worthy 700\$ was confiscated.

# b) Mense profit

• I was detained for 4 months hence not earning a total 6,000\$.

# c) Emotional damage

- Total sadness and fear are the moods that were instigated in me.
- My reputation was tarnished by false accusation of funding terrorism and fraudster.

#### 76. YVONNE TWAGIRAYEZU

# a) Confiscated properties

• A Samsung galaxy A30 (Value: 350\$) was confiscated.

# b) Mense profit

• A 2 months detention crippled my way of earning 1,000\$ monthly hence a 2,000\$ total for those months of absence.

#### c) Emotional damage

I was left in instigated with fear.

#### 77. MUSONI DIEUDONE

# a) Confiscated properties

Because I was outside the country, I left my MTN line to my sister which has 480,000 rwfs (450\$) on MTN Mobile money account and that money was frozen. That money was supposed to help my old parents.

# b) Emotional damage

 Ever since these accusations broke up I can no longer go back to my country, I can visit back my family or talk to them on phone calls because of fear of being arrested.

# 78. KATABARWA OMAR (non-card holder)

# a) Confiscated properties

 My house that is in land; UPI 1/03/03/670, was confiscated due to only my relationship with my children who were falsely accused of frauds (Value: 90,000\$)

# b) Emotional damage

- An old man of 75 years old, I was arrested and detained for 24 hours, within that time I was being questioned by many of intelligence agents who wanted me to reveal where my wanted children were.
- Across whole village that I live in, I was called the father of fraudsters and terrorists which was a big shame to me and my whole family, which cut off my relationships with neighbors and friends.

#### 79. NYIRANKWANO FATUMA

#### a) Mense profit

 My absence from my work cost me a staggering 2,000\$ for the 4 months.

# b) Emotional damage

- I was detained for 4 months without trial just because they couldn't find my children, they chose to arrest and detain me on their behalf which violated my rights. I had not requested or used any card and I didn't know anything about cards.
- I was held away from my family and I was denied to be visited.

#### 80. UWIDUHAYE DIANE

#### a) Emotional damage

 I was called fraudster by false allegations and I was denied to do many of my daily life bank transactions.

# 81. UWIMANA RACHEL (non-card holder)

# a) Confiscated properties

They took my 3,700\$ and an iPhone XR worthy 400\$

# b) Emotional damage

 They searched us in the dawn without search warrant and arrested me in that dark night and terrified me to reveal forcefully my husband's whereabouts hence suffered mental torture.

# 82. SAMARIYA ASIA (non-card holder)

#### a) Confiscated properties

- My money 5,600\$ was taken by them.
- They took my new iPhone pro Max and an HP with accessories total valued at 3,000\$.

## b) Emotional damage

I was honestly terrified by this invasion.

# 83. MUJAWIMANA JASMINI (non-card holder)

# a) Confiscated properties

 My in-law's house furniture was all confiscated valued at 6,000\$ and the house's 5 keys were taken by them forcefully.

# b) Emotional damage

• I was detained for a month without trial hence left terrified.

# 84. AFUWA NAIGA (non-card holder)

#### a) Confiscated properties

• All my house furniture were confiscated plus TV and fridge (all valued at 12,000\$).

#### b) Emotional damage

• They broke the bedroom door and forcefully searched the house which left me highly terrified.

#### 85. NSANZIMFURA DEOGRATIAS (non-card holder)

#### a) Confiscated properties

They confiscated my family business money worthy 55,000\$.

• And an iPhone 14 pro Max worthy 2,000\$ by then.

# b) Mense profit

• I was detained for 2 months without trial hence my business earning 4,000\$ per month collapsed since then.

# c) Emotional damage

I was totally terrified by this scenario.

#### 86. NIBISHAKA EVERGISTE

#### a) Mense profit

• I was earning 800\$ monthly, got detained for 4 months hence the value of 3,200\$ total.

# b) Emotional damage

• I was detained for 4 months without trial hence mental discomfort was a must.

# 87. KATABARWA OMAR (non-card holder)

# a) Confiscated properties

My land title with a house UPI 1/03/03/03/670 worthy 100,000\$ was confiscated just because my children were having those cards.

#### b) Emotional damage

• I'm 80 years old, seeing my two sons detained without trial for 3 months and the second one is still detained till now. This has brought about an intermittent dizziness to an extent that I once fell down on the road and got really damaged/ serious wounds.

# **APPENDIX THREE:**

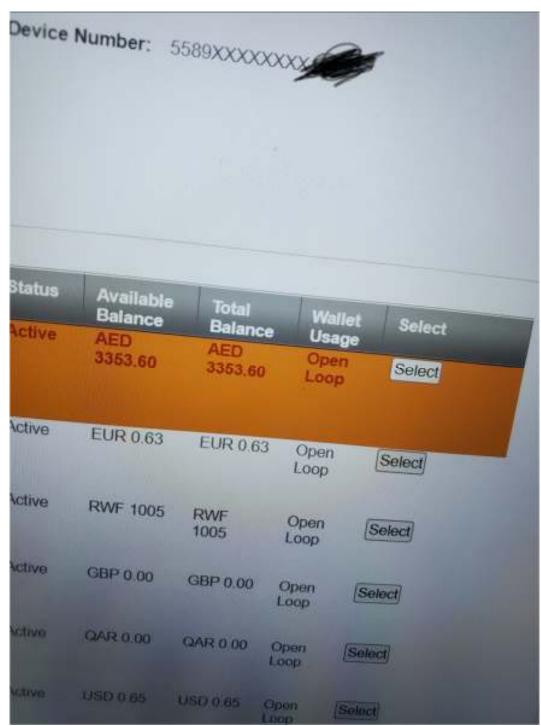
ILLUSTRATION OF TRANSACTIONS ON THE CARD AND PORTAL.

# **APPENDIX 3: ILLUSTRATION OF TRANSACTIONS**

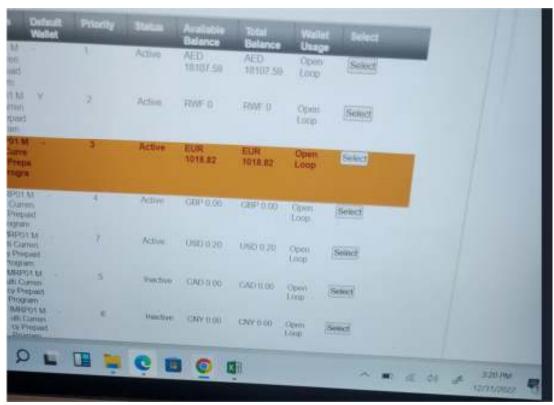
1. This is the email that I&M Bank Rwanda plc sends after they create user credentials to log in mastercard online portal.



2. On one card, you can hold different currencies in different wallets shown in picture bellow:

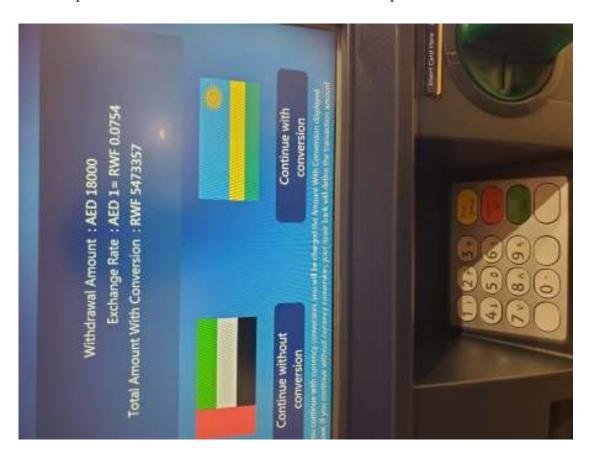


6 currencies are held on this card above (Dirham: AED, Euro, Rwandan Francs: RWF, Pound sterling: GBP, Qatar Riyal: QAR, USD)



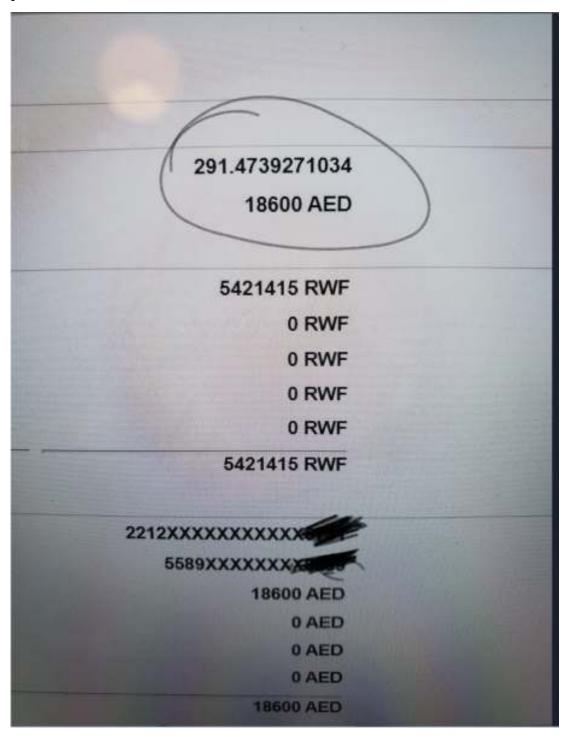
6 different currencies by card holder choice on picture above

3 The comparison of Banks rate to the rate on mastercard platform



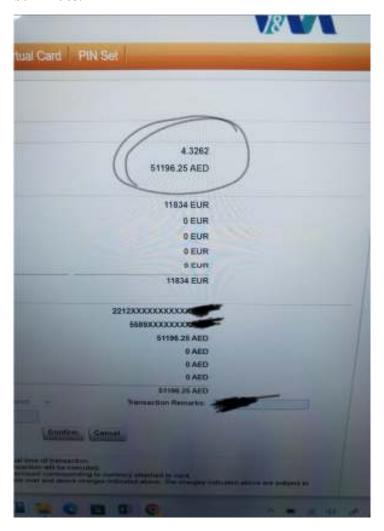
According to the picture above showing how much was bank's rate from RWF to AED was 5,473,357 / 18000 = 304.075, meaning that at bank to get 1 AED you could pay RWF 304.075.

So here bellow was the difference when you sell RWF to AED via MasterCard online portal rate:



It is obvious that in the picture above, the rate of RWF to AED was less, meaning for you to get AED you had to pay much less RWF according to the bank's rate (1 AED = RWF 291.47) compared to the banks rate 304.075. It is now clear that MasterCard rate was around 4.32% less than banks rate which clarify the huge profits were given on this mastercard online portal.

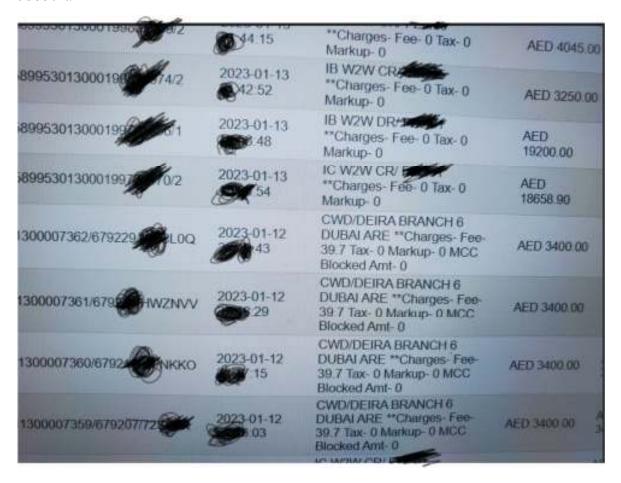
The rate from EURO to AED on MasterCard portal was quite high according to bank rate:



With EUR 1 you get AED 4.3262 and this rate 10% higher than rate at banks and this is where the arbitrage came from, So to shift from AED to EUR, rate was slightly normal around 3.932 (EUR 1 = AED 3.932: you give AED 3.932 to get EUR 1) but backward transaction was totally different (You get AED 4.3262 for only EUR 1) which shows that you get 10% and above by shifting from AED to EUR then back again from EUR to AED.

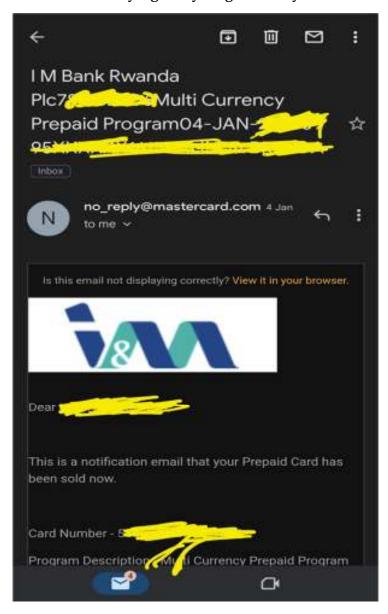
This is what now being lied by Rwanda Investigation Bureau as bank fraud, illegal currencies exchange and arresting more than 100 people over this system rate.

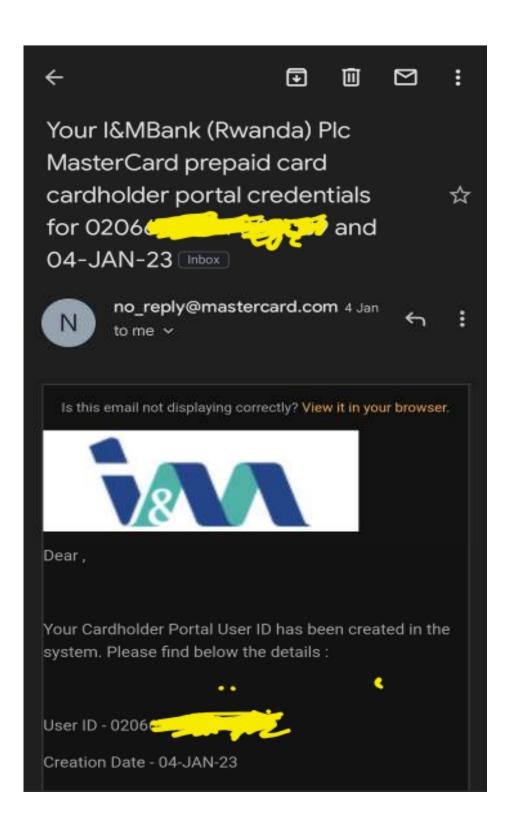
Every single activity done on both physical card (like withdrawing on ATM) and linked online portal (like online currency exchange) is seen by bank and notify the card holder via emails or sms and you can get transactions history in your online portal, meaning that I&M Bank Rwanda and MasterCard were both aware of everything that was being done but now they are trying to lie that they didn't know about it.

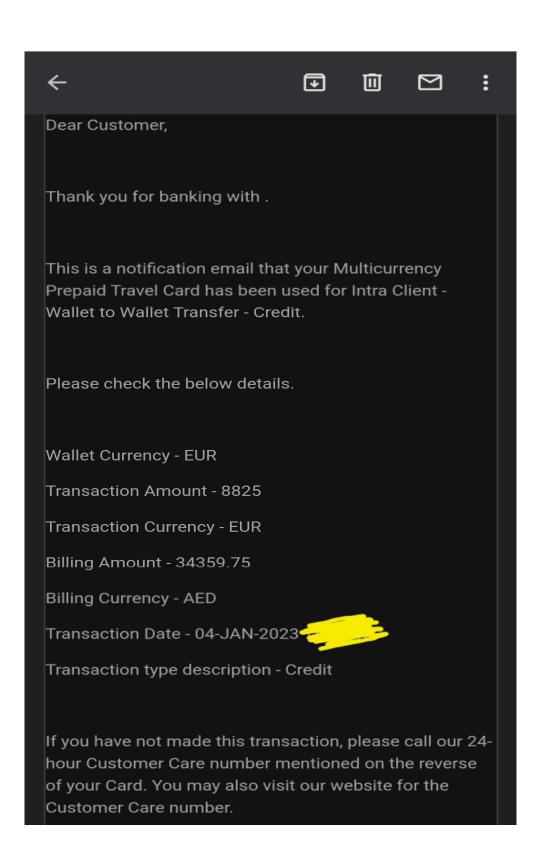


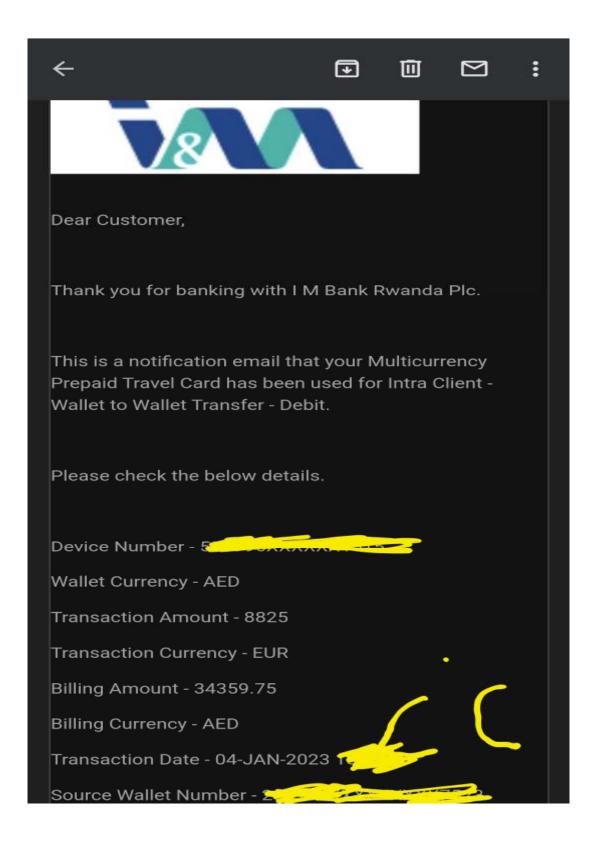
This photo above shows the transaction history from online portal.

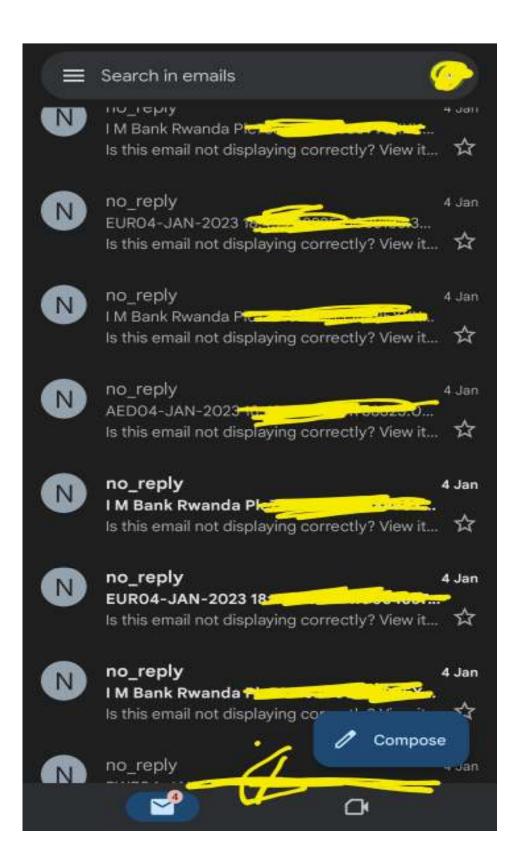
The pictures below are the screenshots of emails sent by I&M bank Rwanda to card holder notifying every single activity on his card

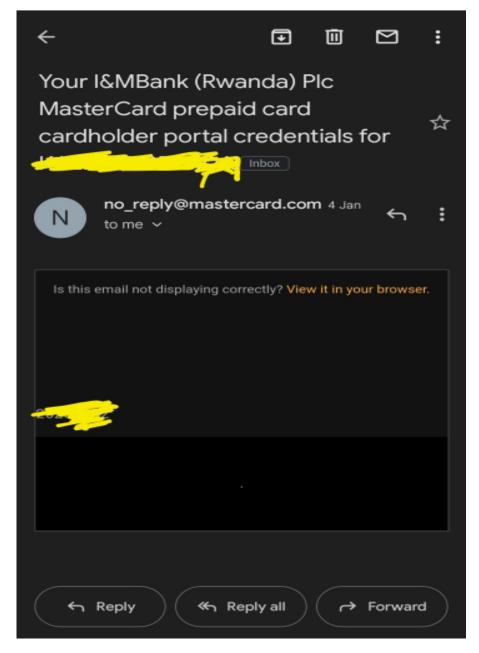








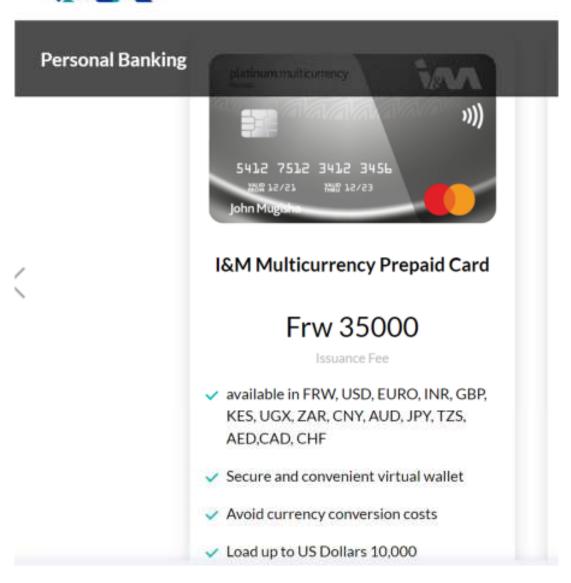




The evidences below, show how the bank advertised the card to lure people visiting their website to take these mastercard multicurrency.

https://www.imbankgroup.com/rw/personal/cards/prepaid-cards/





https://www.imbankgroup.com/rw/cards/im-multicurrency-prepaid-card/

You can see and read all benefits stated by bank themselves.



# Benefits



https://www.imbankgroup.com/rw/wp-content/uploads/sites/2/2021/06/Mastercard-Multicurrency-Application-form.pdf

By this link you can download pdf form to apply for the card and see terms and conditions.

#### Conclusion

Below, are the key reasons that shows the involvement of Mastercard in the human rights violation of the victims and the Applicants which they should be held responsible for victims to get justice:

- 1) Mastercard (a company from USA) gave out this multicurrency card with a technical error by default as said by the bank itself during the court investigation (reference, court hearing on 16/05/2023: Nyarugenge primary court-Rwanda, case number: RDP 004100/2023/TB/NYNGE page 43 article 164 & 165)
- 2) The login and exchange of currencies were both only possible solely with the help of Mastercard portal (<a href="https://sa.cardholder.mastercard.com/">https://sa.cardholder.mastercard.com/</a>). This evidently shows that Mastercard Company is the sole responsible for all these issues as stated by the Nyarugenge primary court-Rwanda (Ref: case number: RDP 004100/2023/TB/NYNGE page 43 article 166 & 167)
- 3) The victims' funds (almost 900,000 USD) are frozen on Mastercard company's platform since mid-January 2023
- 4) Mastercard Company and their agent ( I&M bank ) collaborated to force the victims to pay money (around 500,000 USD) on Mastercard escrow accounts in the I&M bank Rwanda ( 201 ) . They confiscated victims' properties (houses, cars, lands etc ) and with 156 victims, more than 80 of them were put in the jail, among them, 35 people were transferred to prison since mid-January 2023.

# **APPENDIX 4:**

ESCROW ACCOUNTS SET UP WITH RWANDAN INVESTIGATION BUREAU FORCING CARD HOLDERS TO DEPOSIT MONEY IN THAT ACCOUNT OR FACE PERSECUTION: THE ACCOUNT HAS CLOSE TO USD 1M.

Appendix 4: ESCROW ACCOUNTS SET UP WITH RWANDAN INVESTIGATION BUREAU FORCING CARD HOLDERS TO DEPOSIT MONEY IN THAT ACCOUNT OR FACE PERSECUTION: THE ACCOUNT HAS CLOSE TO USD 1M.

# A) ESCROW ACCOUNT DETAILS



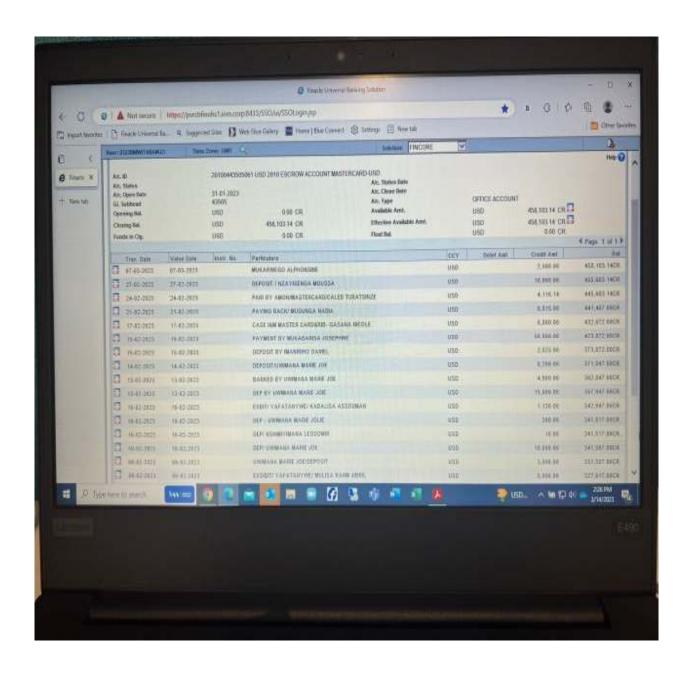
Dear Sir,

Please find below Mastercard escrow accounts in FRW, USD and EUR in I&M Bank (Rwanda) Plc as previously communicated.

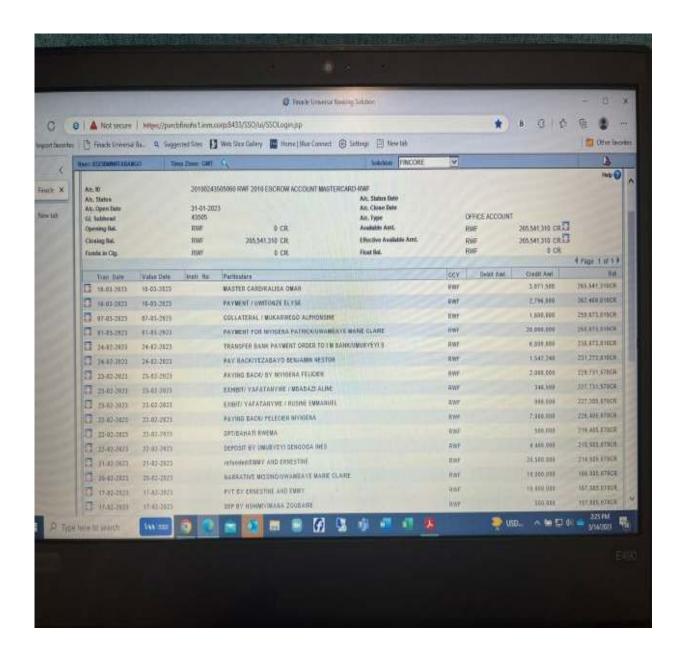
20100243505060	ESCROW ACCOUNT MASTERCARD-RWF
20100443505061	ESCROW ACCOUNT MASTERCARD-USD
20100643505062	ESCROW ACCOUNT MASTERCARD-EUR

Kind regards

# B) LIST OF DEPOSITS IN THE ESCROW ACCOUNT- USD



# C) LIST OF DEPOSITS IN THE ESCROW ACCOUNT-RWF



# D) DEPOSIT SLIP-MUKABARISA JOSEPHINE-USD 50,000



# E) DEPOSIT SLIP-KABARISA ASSOUMAN- USD 297,155



# F) DEPOSIT SLIP- VESTINE TUYIZERE-USD 720



# G) DEPOSIT SLIP- VESTINE TUYIZERE-USD 9698.56

