

ETAH-NAN & C<sup>o</sup>

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Douala - CAMEROON

THE STATE COUNSEL  
COURT OF FIRST INSTANCE  
MUNDEMBE  
NDIAN DIVISION

Dear Sirs,

Re : COMPLAINT BY HERAKLES FARMS (S.G. SUSTAINABLE OILS CAMEROON "SGSOC") AGAINST NASAKO BESINGI

On behalf of our clients Herakles Farms (S.G. SUSTAINABLE OILS CAMEROON "SGSOC"), we are filing a criminal complaint against NASAKO BESINGI who resides in Mundemba and who is the Founder and Manager of an NGO called Struggle to Economise Future Environment (SEFE).

The facts giving rise to this complaint are as follows:-

Over the past few months, Mr NASAKO BISINGI has persistently circulated information in Cameroon and within International NGOS abroad and on internet that Herakles Farms (SGSOC) have illegally taken farm lands within Mundemba Sub Division and exploiting the land in violation of several court orders.

Mr NASAKO BISINGI's campaign to intoxicate the public and to raise ill feelings and resentment against the project initiated by Herakles Farms with the full support of the Government of the Republic of Cameroon, came to head on the 31<sup>st</sup> of August 2012 when he circulated an email captioned "Herakles organised first ambush against SEFE along Mundemba - Toko road". A copy of the said email is herein attached. This email addressed to several International NGOS was meant to portray Herakles Farms (SGSOC) as a lawless and terrorist entity. The circulation of the said email has had and is still having severe consequence on the integrity and good intentions of Herakles Farms (SGSOC) within the local and international business community. Mr NASAKO BISINGI's assertions as contained in his email of August 31<sup>st</sup> 2012 are unfounded and completely devoid of truth. The acts and conduct of NASAKO BISINGI constitute offences punishable under sections 219, 239 and 240 of the Penal Code.

We are therefore requesting for and on behalf of Herakles Farms (SGSOC) that criminal investigations be opened against NASAKO BISINGI for the offences cited above. Our clients are ready to furnish you with any other relevant information you may require and would also be forwarding to you details of their civil claim for damages suffered.

Accept, Sir, our regards.

D. ETAH-NAN