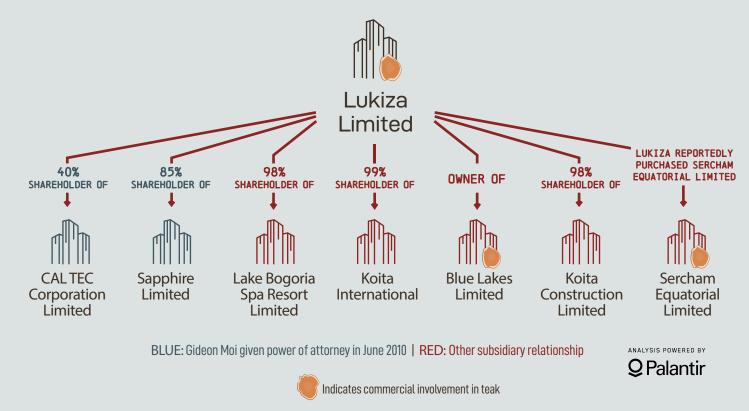
CASE STUDY LUKIZA LIMITED



Powerful foreign actors are able to exploit underregulated and profitable natural resource trades such as teak because of deficiencies in how the sector is managed. The following case study illustrates the involvement of Kenyan elites in South Sudan's teak sector.

Lukiza Limited and two of its reported subsidiaries have operated teak companies in Eastern and Western Equatoria since 2005, and have exported teak through at least February 2019. According to South Sudanese corporate records, Kenyan Senator Gideon Moi, the son of former Kenyan President Daniel Arrap Moi, was a 60% shareholder in Lukiza Limited between 2010 and 2016. Because Kenya is a gateway for South Sudanese teak entering global markets, Gideon Moi's political stature may lend him undue influence in South Sudan's teak trade.

The Moi Family and the Lukiza Limited Network

According to South Sudanese corporate filings from 2010, Gideon Moi was the founder and majority shareholder (60%) of Lukiza Limited, alongside his wife Zahra Moi (38%).¹⁹⁶ While a shareholder of Lukiza, Moi held various political positions, including Vice Chairman of the Kenya African National Union (2008 – 2013) and Senator for Baringo County (2013-2017).¹⁹⁷

Lukiza Limited's corporate relationships within South Sudan and abroad only become apparent through examining corporate records from South Sudan, Kenya, and Uganda. Through at least seven subsidiaries, Lukiza Limited has operated in half a dozen industries in South Sudan including real estate, ¹⁹⁸ financial services, ¹⁹⁹ waste management, ²⁰⁰ and airplane services. ²⁰¹ In addition, Lukiza Limited and its reported subsidiaries also have affiliates incorporated in Kenya and Uganda.

South Sudanese corporate records show that Gideon Moi played a role in the Lukiza network, including in June 2010. In addition to being the majority shareholder, corporate records from June 2010 state that Moi was appointed by Lukiza Limited's Board of Directors "to be our true and lawful attorney." This appointment reportedly enabled him to hold shares on behalf of Lukiza Limited in five South Sudanese companies, including two involved in the teak sector: Blue Lakes Limited and Sercham Equatorial Limited.²⁰²

Kenyan and UK corporate records further state that the Kenyan affiliate of Lukiza Limited is 50% held²⁰³ by a business partner of Gideon and Daniel Arrap Moi in a separate UK company, Zehrabanu Mohamedtaki Janmohamed.²⁰⁴

Corporate records reviewed by C4ADS show that Moi was removed as a shareholder in 2016.²⁰⁵ In October 2019, Gideon Moi denied owning Lukiza Limited, saying, "I am not a shareholder of the company"²⁰⁶ ²⁰⁷ after The Sentry reported that he continued to hold shares in Lukiza Limited. It is unclear if his statement was intended to refute any former ownership or role in the company.

