



REPUBLIC OF KENYA

**NATIONAL CRIME RESEARCH CENTRE**

*Fighting Crime Through Research*



# AN ABRIDGED REPORT OF THE STUDY ON THEFT AND ILLEGAL TRADE IN DONKEY SKINS AND RELATED PRODUCTS IN KENYA



*Photo Source: Photos Shared by Key Informants During Data Collection*

*Dr. Dickson Gitonga Njiru  
Phyllis Muriuki*



# EXECUTIVE SUMMARY

The theft and illegal trade in donkey skins and related product in Kenya and in the African region, has evolved into a sophisticated criminal enterprise that undermines both rural livelihoods and national biosecurity. Driven by an insatiable international demand for hides, illegal networks operate through covert slaughter and cross-border smuggling, often bypassing formal veterinary and leather industry regulations. The illegal extraction of donkeys not only depletes a vital draft animal population, which declined from 1.8 million in 2009 to 1.1 million in 2019, but also introduces significant public health risks due to the unhygienic conditions of clandestine processing sites.

The general objective of the study was to explore the current dynamics of theft and illegal trade in donkey skins and related products in the country with a view to informing relevant evidence-based strategic interventions to curb the illegal trade. The specific objectives of the study were to: establish the current patterns of theft and illegal trade in donkey skins and related products: examine the mode of operation (modus operandi) of theft and illegal trade in donkey skins and related products: assess the impacts of theft and illegal trade in donkey skins and related products, and evaluate the effectiveness of the measures for curbing the theft and illegal trade in donkey skins and related products. The study was conceptually grounded in the Routine Activity Theory and the Political Economy Theory. The former explains how the convergence of motivated offenders, suitable donkey targets, and the absence of capable guardianship creates opportunities for donkey theft, while the latter elucidates the broader political and economic forces, market dynamics, and capital interests that sustain the illegal trade in donkeys and donkey-derived products.

The study adopted a qualitative research design aimed at gaining in-depth understanding of the dynamics of theft and illegal trade in donkey skins and related products in Kenya. The study was carried out in nine purposively selected counties where incidences of theft and illegal trade in donkey skins and related products have been most prevalent in Kenya namely: Machakos, Kajia-do, Mombasa, Embu, Kitui, Nakuru, Narok, Turkana and Kiambu.

The study population comprised key stakeholders involved in the donkey value chain, as well as institutions responsible for animal welfare, law enforcement, and the regulation of trade. These included the Association of Donkey Owners in Kenya (ADOK) which brings together donkey



owners across the country, Farming Systems Kenya (FSK) ; Inades-Formation Kenya (IFK) which provides oversight on donkey welfare and monitors community impacts of the illicit trade; Institute of Pastoralism Development and Research (IPDR); Kenya Society for the Protection and Care of Animals (KSPCA); Brooke East Africa; Donkey Sanctuary of Kenya; law enforcement officers (National Police Service); officers from the Office of the Director of Public Prosecutions (ODPP); officers from the Judiciary; National Government Administrative Officers (chiefs and assistant chiefs); County government officials in charge of livestock and agriculture, donkey slaughterhouse operators and middlemen; and community leaders and opinion shapers among others.

Data were collected through face-to-face key informant interviews, focus group discussions, and direct field observations of issues related to the study. Key Informant Interview (KII) and Focus Group Discussion (FGD) guides were developed in line with the study objectives and pre-tested in a non-sampled county to ensure their clarity, relevance, and reliability. Primary data were obtained from a total of 205 respondents through Key Informant Interviews (KIIs) and eight Focus Group Discussions (FGDs).

The qualitative data were analyzed using thematic analysis to identify emerging patterns, themes, and relationships. The findings provide an evidence base for strategic policy and programmatic recommendations aimed at preventing and combating donkey theft and the illegal trade in donkey skins and donkey-derived products, thereby addressing an emerging national security, animal welfare, and socio-economic concern.



## KEY FINDINGS

### CURRENT PATTERNS OF THEFT AND ILLEGAL TRADE IN DONKEY SKINS AND RELATED PRODUCTS

The study found that current patterns of donkey theft have evolved from isolated opportunistic incidents to increasingly coordinated and organized criminal activities targeting free-grazing donkeys in rural and peri-urban areas. Most thefts occur at night or in locations with limited surveillance and inadequate security. The findings further indicate a growing trend of cross-border smuggling of live donkeys and donkey skins, driven by sustained market demand and facilitated by porous borders, weak enforcement, and established illicit trade networks. The Key findings of the study are as follows:

#### 1. Shift from Live Donkey Theft to Clandestine Bush Slaughter

The study established that the nature of donkey-related crime has evolved from stealing live animals for local labor to immediate "bush slaughter" for skins and meat. Respondents noted that owners frequently discover carcasses of their stolen animals, indicating that criminals are prioritizing the high-value skin for the international market over the live animal.

#### 2. Regional Concentration of Donkey Theft and Illegal Slaughter

Research showed that theft and illegal slaughter were most acutely reported in Mwingi East, Mwingi Central, Kiambu, Machakos, and Kajiado. In these regions, stakeholders noted growth in cases, reaching over 200 reported donkey thefts, according to veterinary and welfare officers in the mentioned counties

#### 3. High International Demand for Donkey Skins as a Primary Driver

The driving force behind the illegal trade is the lucrative international market, particularly in China, for donkey skin gelatin (ejiao). This demand makes the skin the most "prized asset," overshadowing the donkey's traditional value as an animal for domestic work

#### 4. Emergence of Bush Slaughter Houses to Evade Detection

Illegal slaughterhouses are evolving at a high rate, shifting to mobile "bush" sites to remain hidden from public health and security officials. Research findings indicated that large numbers donkeys are now being divided into small clusters and driven into the bush rather than being loaded onto trucks to avoid suspicion.



## MODE OF OPERATION (MODUS OPERANDI) OF THEFT AND ILLEGAL TRADE IN DONKEY SKINS AND RELATED PRODUCTS

The theft and illegal trade in donkeys typically follow an organized chain involving theft from farms or grazing areas, often at night or in remote locations with limited security. In some instances, the donkeys are bought from markets. The animals are quickly transported to hidden or illegal slaughter sites, bypassing veterinary inspection and regulatory oversight. Intermediaries then move the skins and other products through informal networks, sometimes using forged documents or corrupt facilitation, before smuggling them across borders via established trafficking routes.

### 1. Strategic Use of Nocturnal Operations and Environmental Conditions

Research findings established that syndicates strategically time their operations often between **12:00 am** and **4:00 am** to exploit the silence of the night. Furthermore, evidence showed that these groups often coordinate raids with heavy rains to mask the noise of the operation and wash away blood trails, thereby minimizing the risk of forensic detection.

### 2. Sophisticated Daytime Reconnaissance and Deceptive Tactics

The findings from the study indicated that "spotters" often disguise themselves as ordinary citizens, water vendors, or charcoal sellers during the day. This reconnaissance phase allows criminal networks to monitor security patrol movements and identify homes with high donkey populations and minimal security before striking at night.

### 3. Targeted Neutralization of Physical and Animal Security

The research findings showed a calculated approach to disabling security, including the poisoning or killing of guard dogs in homesteads near major highways. This established pattern ensures that the theft of animals can occur without alerting the owners or the community.

### 4. Logistical Innovation through the System

Evidence from the research findings shows the use of a professionalized value chain. In this process, criminal perpetrators across different villages coordinate the movement of animals in distinct stages, ensuring that no single individual is linked to the entire theft-to-market process. In this specific context of livestock theft, perpetrators across different villages coordinate the transport of animals through distinct,



compartmentalized stages, intentionally ensuring that no single individual is linked to the entire theft-to-market sequence. This clandestine structure stands in direct contrast to legitimate agricultural markets, where animal owners voluntarily engage in transparent transactions with verified traders, maintaining formal documentation and adhering to established market protocols. The illicit model is characterized by the deliberate avoidance of these formal channels to obscure the origin of the animals, whereas legitimate trade relies on traceability and owner consent.

### **5. Use of Specialized "Luring" and "Silent Slaughter" Techniques**

Research findings also established that thieves use salt or fodder to lure donkeys quietly from their pens. To avoid the noise associated with moving live animals, syndicates increasingly prefer "bush slaughtering," where animals are processed on-site and only the high-value hides are evacuated.

### **6. Market-Driven "Order-to-Delivery" Planning Models**

The study also established a demand-driven model where some meat suppliers source orders in restaurants and institutions or urban markets. Once an order is received, criminal groups are recruited to steal, slaughter, and transport the meat in sacks via boda bodas to unsuspecting customers in areas like Burma or Ndunyu meat markets of Nairobi.

### **7. Exploitation of High-Speed Transport and "Toyota Probox" Logistics**

Research findings indicated that logistical speed is maintained by using small, fast vehicles like "Toyota Probox" positioned at strategic road junctions. This established method allows for the rapid evacuation of carcasses or hides before dawn, often by-passing major checkpoints through "panya routes."

### **8. Establishment of Deep "Insider" and Informant Networks**

From the study, it emerged that syndicates establish robust networks with local residents who provide "insider" knowledge on vulnerable herds. These informants also mislead recovery efforts by providing false information to search parties, ensuring the successful exit of the stolen livestock.

### **9. High-Level Cartel Coordination and Security Neutralization**

Research findings established the existence of a "cartel" structure that coordinates the entire supply chain from sourcing to slaughter. Disturbingly, reports indicated that some illegal processing is done under the "guard" of rogue security elements, suggesting the planning phase includes the recruitment of officials to protect slaughter sites.



## **IMPACTS OF THEFT AND ILLEGAL TRADE IN DONKEY SKINS AND RELATED PRODUCTS**

The study found that donkey theft and the illegal trade in donkeys and donkey-related products have significant socio-economic, animal welfare, and public health consequences. The loss of donkeys deprives many rural households of a critical source of labour and income, thereby reducing agricultural productivity, limiting access to markets and essential services, and increasing household vulnerability. The impacts are particularly severe for women, children, older persons, and other vulnerable groups who rely heavily on donkeys for transportation and livelihood activities.

The findings further indicate that the illegal slaughter and trafficking of donkeys result in considerable animal suffering and undermine animal welfare standards. If left unchecked, these activities may contribute to a decline in donkey populations, thereby threatening the sustainability of donkey-dependent livelihoods and the resilience of rural economies. In addition, the operation of unregulated slaughter sites without veterinary inspection poses potential public health risks through poor hygiene, inadequate waste disposal, and the circulation of animal products outside established regulatory and food safety systems.

### **1. Severe Environmental and Resource Contamination**

It was established that the illegal disposal of rotten carcasses into the environment finds its way into water sources hence leading to the contamination. Also decaying remains abandoned in remote thickets cause severe air pollution. When decomposing organic matter leaches into the water flow used by humans and livestock, it turns waterways into active health hazards while persistent foul odors are not merely a nuisance but also present risks to the respiratory well-being of local residents.

### **2. Public Health Risks from Uninspected Meat**

Research findings established that the clandestine nature of "bush slaughter" bypasses all veterinary oversight. Data showed that consumers are exposed to diseases and bacterial contamination, such as anthrax and worm infestations due to the unsanitary conditions of slaughter and the lack of necessary health inspections by public health experts.

### **3. Transport Logistics Disruption**

The study finding also indicated that the theft of donkeys results in a severe disruption in rural logistics for affected communities. Research findings showed that small-scale farmers are unable to move harvests to trade centers before they perish, effectively leading to loss of investments in months of agricultural labor and inputs.



#### **4. Increased Labour Burden on Women**

It was established that the loss of donkeys places a disproportionate physical burden on women and children. Evidence showed that tasks previously handled by donkeys such as fetching water now require half a day of back-breaking manual labor, leading to "time poverty" that prevents women from engaging in other productive activities.

#### **5. Increase in Child Labour and Disruption of Education**

The research study findings indicated that when donkeys are stolen, the burden of labor often shifts to children. Research findings showed that school going pupils and students are frequently forced to drop out of school to assist with fetching water and manual chores, trapping the next generation in a cycle of structural poverty.

#### **6. Disruption of Agricultural Planting and Irrigation Cycles**

Research findings established that donkeys are vital for plowing and transporting water for irrigation. Established data showed that the theft of a single animal can disrupt the entire planting cycle, leading to crop failure because farmers lack the means to ferry water from distant riverbeds during dry spells.

#### **7. Erosion of Social Fabric and Communal Trust**

Evidence from focus group discussions established that the scarcity of donkeys triggers a "culture of borrowing" that leads to social friction between communities. Research findings indicated that as owners become increasingly protective of their remaining animals, traditional mutual aid systems dissolve, replaced by a climate of suspicion and anxiety.

#### **8. Permanent Biological "Extinction Stage" Warnings**

Research findings have indicated a grave warning that the species is approaching an "extinction stage." Data showed that because the donkey's biological recovery (a 3-to-4-year cycle) cannot match the current rate of theft and slaughter, the long-term sustainability of donkey-reliant livelihoods is under immediate threat.

#### **9. Psychological Trauma and Loss of Household Security**

It emerged from the finding that owners experience significant emotional distress, viewing donkeys as "household partners" rather than mere tools. Furthermore, research findings showed a loss of immediate security, as the donkey historically served as an alert system against night-time intruders.



## **EFFECTIVENESS OF THE MEASURES FOR CURBING THEFT AND ILLEGAL TRADE IN DONKEY SKINS AND RELATED PRODUCTS**

This is a critical indicator of the success of legal, institutional, and community-based interventions being implemented to protect donkey populations and safeguard livelihoods. This includes multi-agency enforcement operations, border controls, public awareness campaigns, and regional cooperation mechanisms. Assessing the effectiveness of these interventions is essential in determining the extent to which they have reduced incidences of donkey theft, disrupted illegal trade networks, strengthened compliance with existing laws, and contributed to the sustainable protection and welfare of donkeys.

### **1. Inadequacy of Oversight and Regulations**

The study established that veterinary departments are responsible for enforcing animal health acts and monitoring movement permits. Evidence showed that there is a significant weakness in monitoring and enforcement due to a lack of proper legislation specifically tailored to deter the illegal slaughtering of donkeys. A critical gap exists in the Meat Control Act, which primarily focuses on traditional livestock (cattle, goats, and sheep) and lacks stringent, specific penalties for the clandestine slaughter of donkeys. Furthermore, current laws do not adequately address the unique logistics of the donkey skin trade; for instance, there is a legislative vacuum regarding the possession and transportation of donkey hides without corresponding meat inspection certificates. This legal ambiguity allows smugglers to exploit loopholes where penalties are often minimal fines that do not reflect the high market value of the hides, thereby failing to serve as an effective deterrent against organized criminal networks.

### **2. Enforcement Challenges by the National Police Service (NPS)**

Research findings indicated that while communities provide information, the police are responsible for investigations and arrests. A primary operational gap driving poor police response is the acute lack of holding facilities for recovered donkeys. Unlike smaller livestock, donkeys require significant space and resources for maintenance during the duration of a case; consequently, police are often reluctant to respond to reports because they cannot secure the "exhibit" (the live animal) without incurring logistical burdens they are not equipped to handle.

Furthermore, the research established that the current legal framework contributes to this inaction. While the theft of a donkey is a crime, the act of unauthorized slaughter is often treated as a regulatory or veterinary infraction rather than a high-priority punishable criminal offense under the Penal Code.

### **3. Centralized Coordination from Chiefs**

The study established that that National Government Administration Officers provides the essential high-level coordination required for integrated security operations. Data indicated that this coordination is critical for mobilizing response support from the police and technical departments and frontline defense via the "Nyumba Kumi" for early-warning to create a unified front against illegal operations.



#### **4. Prosecution gaps and the Push for Deterrent Sentencing**

Research findings established that the primary challenge with prosecution is reliance on outdated animal welfare laws that are scattered across several statutes. For example, the Prevention of Cruelty to Animal Act (Cap.360) (1962), the Animal Diseases Act (Cap 364) and Animal Disease Rules, 1968 that regulate animal movements, import/export and disease outbreak response. The Penal Code (Cap 63) Laws of Kenya Section, 289 criminalizes the killing of an animal with intent to steal the carcass or skin. However, these aging laws contain loopholes that limit real protection for animals.



## CONCLUSION

In conclusion, the illicit donkey trade in Kenya has evolved from localized, petty theft into a highly organized, clandestine enterprise driven by global demand for ejiao and the pursuit of rapid financial gain. The data reveal a shift toward a sophisticated "zero-waste" commodity model where criminal networks systematically exploit environmental stressors, porous borders, and institutional gaps such as the contradiction between licensed exports and criminalized slaughter to maintain a steady supply chain of skins, meat, and specialized equine parts for both local and international shadow markets.

The persistence of these criminal activities is further entrenched by a systemic "enforcement gap," where well-capitalized syndicates utilize flexible logistics and industrial-scale storage to bypass localized, often under-resourced, law enforcement. This creates a high-profit, low-risk environment that effectively leverages urban protein demand and systemic corruption to insulate operations from judicial scrutiny, leaving rural households to bear the brunt of the socioeconomic and productive losses caused by the continuous depletion of their essential livestock assets.

The research findings showed that the illicit donkey trade functions through a highly adaptive and tiered hierarchy that effectively integrates local reconnaissance with high-level institutional and political protection. This operational structure relies on a "division of labor" model, where localized actors such as youth groups, scouts, and compromised officials perform the high-risk tasks of theft and clandestine processing, while financial controllers and urban brokers manage the supply chain to minimize personal exposure. By leveraging "legal mimicry," forged documentation, and systemic bribery, these syndicates successfully bypass regulatory frameworks, allowing the trade to persist despite periodic enforcement efforts.

The prevention and oversight of the illicit donkey trade rely on a complex, multi-agency framework involving National Government Administration Officers, the National Police Service, and veterinary departments, which coordinate alongside community-led initiatives such as the Nyumba Kumi and non-governmental organizations like Brooke East Africa and KENDAT. While interventions such as community surveillance clusters, night vigils, and the integration of technological platforms like "Punda-Wangu" have demonstrated effectiveness in specific regions, many enforcement efforts remain hampered by inconsistent implementation and systemic resource deficits. Strategic measures, including highway intercepts and public health disposal protocols, often face limitations, as criminal syndicates exploit the absence of species-specific legislation and the lack of unified, real-time intelligence sharing between state and non-state actors.

The effectiveness of current strategies is further undermined by profound legal, structural, and socio-economic challenges that continue to facilitate the trade. Enforcement is severely constrained by the lack of gazetted holding grounds for recovered animals, insufficient forensic infrastructure, and "toothless" legal frameworks that rely on outdated statutes, which fail to provide meaningful



deterrents or clear mechanisms for proving ownership once animals are slaughtered. Beyond these logistical barriers, deep-seated systemic issues including institutional infiltration, the "culture of silence" fostered by intimidation, and regional cultural beliefs regarding the utility of donkey products create a hostile environment for frontline officers. Ultimately, as documented in," the current enforcement model remains largely reactive, struggling to transition from disjointed, localized responses toward the centralized policy and operational cohesion required to dismantle the industrial-scale exploitation of donkey populations.

This crisis is compounded by the erosion of social cohesion, as resource scarcity dissolves traditional mutual aid systems and replaces them with a climate of suspicion, vigilantism, and instability. As the donkey population faces a real risk of regional extinction due to theft rates far outpacing biological recovery, the resulting demographic drain manifested through rural-to-urban migration strips the agricultural sector of its labor force. Ultimately, the illegal trade acts as a permanent destabilizer, dismantling the rural micro-economy and leaving communities without the foundational transport and agricultural support necessary for long-term viability and development.

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## KEY RECOMMENDATIONS

To strengthen the prevention, and enforcement of measures on theft and the illegal trade in donkeys and related products, the study makes the following recommendations addressed to specific state and non-state actors:

### **1. Ministry of Agriculture & Livestock Development): /Directorate of Veterinary Services/County Government Veterinary Services):**

- i. Enact a comprehensive Donkey Protection Law to strengthen donkey welfare, regulate the donkey value chain, promote sustainable reproduction, and establish specific offences and penalties.
- ii. Declare donkeys a threatened livestock species and fully domesticate and enforce the African Union moratorium on donkey slaughter for skins, including revoking illegal slaughter operations and strengthening regulatory oversight.
- iii. Implement a national donkey identification and traceability system, strengthen livestock movement controls through verified certificates of origin, and support enforcement with holding grounds, rescue centres, and veterinary services for recovered donkeys.
- iv. Promote sustainable donkey-based livelihoods, including milk and other non-extractive value chains.
- v. Strengthening cross-border collaboration through the East African Community (EAC) and partnerships with wildlife authorities to combat links between donkey trafficking, wildlife crime, and bushmeat trade.
- vi. Standardize and digitize livestock movement permits and dispatch notes, including a mandatory no-objection clearance system for inter-county donkey movements to prevent document fraud and illegal transport.
- vii. Strengthen routine and unannounced inspections of meat processing facilities and hide and skin collection centres to improve compliance, traceability, and detection of illegal donkey products.

### **2. National Government (Ministry of Interior & National Administration); National Police Service (NPS) & Directorate of Criminal Investigations (DCI)**

- i. Domesticate and implement the Rapid Response Initiative (RRI) model in collaboration with the Ministries responsible for Livestock and Public Health to strengthen coordinated prevention and response to donkey theft and illegal slaughter.
- ii. Recognize donkey theft and bush slaughter as emerging forms of organized crime by recording donkey theft alongside cattle rustling statistics and prioritizing reporting, investigation, and response at all police stations.



- iii. Strengthen intelligence-led, multi-agency enforcement by enhancing coordination between the NPS, DCI, and Veterinary Services, targeting criminal syndicates across the entire illegal trade chain rather than only low-level offenders.
- iv. Intensify public awareness on donkey protection and welfare through village barazas, community policing forums, and security meetings.
- v. Strengthen anti-corruption and accountability measures at transit checkpoints through enhanced oversight, digital surveillance, and internal integrity systems to prevent collusion and the illegal movement of donkeys.

### **3. Office of the Director of Public Prosecutions (ODPP) & Judiciary**

- i. Build the capacity of prosecutors and judicial officers on livestock-related offences and the applicable legal framework to ensure effective prosecution and the imposition of appropriate deterrent penalties.
- ii. Apply maximum statutory penalties, asset forfeiture, and asset recovery measures to remove the financial incentives for donkey theft and the illegal skin trade.
- iii. Strengthen community awareness on donkey protection and welfare through the Court User Committees (CUCs) and other public outreach initiatives.

### **4. Kenya Revenue Authority (Customs) & Border Control Agencies**

- i. Strengthen inspection and verification of animal products at all import and export points through mandatory declarations and inter-agency collaboration to prevent the laundering of donkey skins through legitimate trade channels.
- ii. Enhance border surveillance and intelligence sharing with neighboring countries and relevant enforcement agencies to disrupt cross-border donkey theft and illegal trade networks.
- iii. In line with the national moratorium on donkey slaughter for skins, review Kenya's export classification and remove donkeys and donkey products as export commodities to eliminate opportunities for illegal trade through formal export channels.

### **5. Civil Society Organizations**

- i. Strengthen grassroots awareness on responsible donkey ownership, welfare-based management, natural reproduction, and donkey security.
- ii. Promote community policing, rapid reporting mechanisms, and collaboration with local leaders and the National Police Service to prevent donkey theft and illegal trade.



*Photo Source: Photos Shared by Key Informants During Data Collection*

#### **NATIONAL CRIME RESEARCH CENTRE**

**ACK Garden Annex - Ground Floor,  
1st Ngong Avenue, Off Bishop's Road  
P.O. Box 21180-00100 Nairobi, Kenya  
Tel: +254-20-2714735**

**Email: [director@crimeresearch.go.ke](mailto:director@crimeresearch.go.ke)**

**Website: [www.crimeresearch.go.ke](http://www.crimeresearch.go.ke)**