

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
SPRINGFIELD DIVISION

SEXUAL MINORITIES UGANDA,	)	
	)	
<i>Plaintiff,</i>	)	Civil Action No.
	)	
v.	)	3:12-CV-30051-MAP
	)	
SCOTT LIVELY, individually and as	)	
President of Abiding Truth Ministries	)	
	)	
<i>Defendant.</i>	)	
	)	

**DECLARATION OF SAM GANAFA**

I, Sam Ganafa, hereby declare as follows:

1. I serve as chair of the Board of Plaintiff Sexual Minorities Uganda.
2. As board chair, I have no role in, or direct, personal knowledge of, Plaintiff's day-to-day operations.
3. I have no direct or personal knowledge of the individual acts of persecution set out in the complaint or in Plaintiff's supplemental responses to Defendant's interrogatories, with the exception of a series of media targeting by Ugandan tabloids.
4. I am based in Kampala, Uganda, and employed full-time in a position with a company that is not connected in any way with my service on the board of Sexual Minorities Uganda.
5. Traveling to the United States for a deposition would require me to be away from my job for at least a week, and would result in an extreme hardship and inconvenience.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Kampala on this 14<sup>th</sup> day of June 2015.



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Sam Ganafa