

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
SPRINGFIELD DIVISION

SEXUAL MINORITIES UGANDA,

Plaintiff,

v.

SCOTT LIVELY, individually and as
President of Abiding Truth Ministries,

Defendant.

CIVIL ACTION

NO. 3:12-CV-30051-MAP

JUDGE MICHAEL A. PONSOR

DECLARATION OF DIANE SYDNEY BAKURAIRA

I, Diane Sydney Bakuraira, hereby declare as follows:

1. I am a citizen and resident of Uganda.
2. I am the Office Administrator at Sexual Minorities Uganda (SMUG), and have worked in this position since 2013. Prior to taking this position at SMUG, I was affiliated with SMUG since its founding in 2004, as a member of one of SMUG's member organizations, Freedom and Roam Uganda (FARUG), a lesbian, bisexual, and transgender organization.
3. The staff of SMUG has faced a significant number of ongoing threats and attacks in recent years. I personally was outed by the *Helto* tabloid in March 2014. The *Helto* article displayed my name and photograph, and multiple false allegations about me. The article also mentioned that I worked for SMUG.
4. I was also outed in a February 25 2014 issue of the *Red Pepper* tabloid entitled "EXPOSED! Uganda's 200 Top Homos Named." The *Red Pepper* article also contained my

home address, and I subsequently received threats at my home and was forced to move after having lived there for five years.

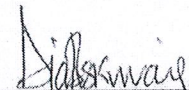
5. Being publicly outed in these tabloids made me fear for my safety and took a significant and lasting toll on my wellbeing.

6. Due to the harassment I faced following the outings, I faced difficulty in traveling to SMUG's office. Instead of being able to move freely to and from work as I had done prior to being outed, I had to limit the timing of my travel and start going by car because of the security concerns. SMUG covered the extra costs of my transportation. These security concerns also prevented me from traveling to the office outside of daylight hours, making it difficult to fulfill all of my work for the organization. As a result, other SMUG staff members assisted by taking over some of my responsibilities, which pulled them away from their own work for the organization.

7. The impact of the trauma of being outed, threatened, and harassed on my mental and physical health also hampered my performance at work.

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 on ^{August} ~~July~~ 2016 in Kampala, Uganda.


DIANE BAKURAIRA