

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
SPRINGFIELD DIVISION

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SEXUAL MINORITIES UGANDA

Plaintiff,

CIVIL ACTION

v.

NO. 3:12-CV-30051-MAP

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

JUDGE MICHAEL A. PONSOR

Defendant.

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DECLARATION OF JAY MULUCHA

I, Jay Mukucha, hereby declare as follows:

1. I am a citizen and resident of Uganda.
2. I am a founder and Executive Director of Fem Alliance Uganda.
3. Fem Alliance is a non-governmental organization that was founded in 2011 to support the human rights of lesbian, bisexual, and transgender groups to help eradicate cultural and societal bias against minority groups. Fem Alliance is based in Kampala, Uganda.
4. Fem Alliance is a member of Sexual Minorities Uganda (SMUG). SMUG plays a critical role in organizing and leading the LGBTI community in Uganda. Its efforts building capacity among the community is essential to Fem Alliance's work.
5. One evening shortly after the passage of the Anti-Homosexuality Act (AHA) in early March 2014, a fellow staff member and I were present at the Fem Alliance office when three men came and asked for me by name. The men began to say threatening things, such as "this is the office; you're the people," and referenced the AHA.

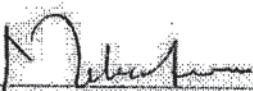
6. The men then picked up one of the computers at the reception desk and threw it to the floor. They continued to destroy things in the office, and repeated disparaging statements, including accusations that we degrade and "spoil" the culture, and that "even white people in America are not with this." The staff member and I fled the office.

7. We returned to the office later that evening and found that it had been further ransacked, and an external hard drive had been taken.

8. Following the office raid, Fem Alliance was forced to move locations. In the new location, we continued to feel threatened and decided to close that office and began operating remotely for a time.

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, Uganda, on this August/03 / 2016.

  
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Jay Mwanga