

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 SANDRA NTEBI**

I, Sandra Ntebi, hereby declare as follows:

1. I am a citizen of Uganda, currently residing and working in Kampala, Uganda.
2. I am a research associate and advocate for the rights of lesbian, gay, bisexual, transgender, and intersex (LGBTI) persons.
3. I serve as a member of the board of the LBT organization, Freedom and Roam Uganda (FARUG), which is a member organization of Sexual Minorities Uganda.
4. I am a responder on a security hotline for the LGBTI community in Kampala. In April 2014, I received a call on the hotline from someone informing me that the Makerere University Walter Reed Clinic, based in Kampala, was raided by police. I later saw news reports of this incident as well.
5. The Walter Reed clinic is a medical research facility that conducts HIV research and at the time of the raid, provided health services to LGBTI people. Following the raid, I



contacted the management of the clinic who told me that they suspended its operations for a while.

6. Following the raid, numerous men in the LGBTI community sought my assistance in obtaining health services elsewhere as they believed they could no longer obtain them at Walter Reed or were afraid to return to the clinic.

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 July 31, 2016.



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Sandra Ntebi