

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,

Defendant.

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**DECLARATION OF KATHERINE ROUBOS**

I, Katherine Roubos, hereby declare as follows:

1. I am a citizen and resident of the United States.
2. From approximately June through September 2007, I did a journalism internship at the Daily Monitor, one of the major newspapers in Uganda with national circulation.
3. A Ugandan Editor at the Daily Monitor asked me to complete an article about a court case brought by Victor Mukasa in the Ugandan High Court and was then asked to cover other issues and events related to lesbian, gay, bisexual, and transgender (LGBT) people and groups in Uganda.
4. I covered and wrote about the press conference held by Sexual Minorities Uganda in August 2007 when they launched a "Let Us Live in Peace Campaign."
5. After some of these stories were published, I was called into an editor's office for a meeting with several others, who were other editors and colleagues, during which I was questioned about my sexual orientation. They then read from a letter that Ssempe sent to people in government and at the Daily Monitor in which he accused me of importing homosexuality and

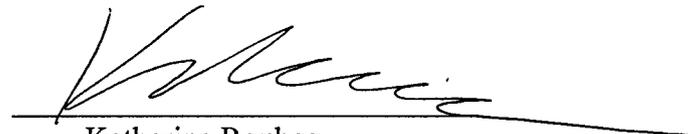
demanding that I be punished and deported.

6. Shortly after this, Ssemu organized a rally against homosexuality in response to the press conference held by Sexual Minorities Uganda that I attended and covered for the Daily Monitor. The article, entitled "Rally denounced homosexuality," published on Aug. 22, 2007, annexed hereto as Exhibit A, is a true and correct copy of the article I wrote about the event and related developments and accurately reflects what occurred.

7. The statements attributed to the persons quoted in the article accurately reflect what they said.

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

Executed on July 31, 2016 in Northampton, Massachusetts

  
Katherine Roubos

# **EXHIBIT A**

Daily Monitor, August 22,2007

## **Rally denounces homosexuality**

By KATHERINE ROUBOS  
KAMPALA

ABOUT 100 people gathered on the grounds of Kyadondo Rugby Club in Kampala yesterday to rally against homosexuality.

Members of the Interfaith Rainbow Coalition Against Homosexuality delivered a document to Minister of Ethics and Integrity Nsaba Buturo, calling for stronger government action against what Pastor Martin Ssempe described as "a well-orchestrated effort by homosexuals to intimidate the government". Born-again Pastor Ssempe of Makerere University Community Church was the key organizer of the event. The rally was convened in response to a news conference held last week by Sexual Minorities Uganda at which gay, lesbian, and transgender Ugandans asked the government to let them live in peace. Gays have reported various forms of harassment, especially from the police.

Placards with a variety of slogans ranging from "God hates Homosexuality, He loves Homos", to "Government Fight Homosexuals and Lesbians", "Homosexuality causes Aids", and even "Homosexuals are not ready for Chogm" were pasted along the fence outside the demonstration venue. Inside, protestors chanted and shouted similar slogans to each other and spoke to the swarming media. The rally was originally planned as a march from Wandegaya to the rugby grounds, but police denied the protesters permission, saying they could not organize sufficient security for the march at short notice. Pastor Ssempe said he convened the protest to urge more government officials to speak out against homosexuality.'

He condemned outside pressure from Canada and the Netherlands to change Ugandan laws or increase rights for homosexuals, calling it an "imposition of Western values"; At the rally, Pastor Sempa warned protesters that every empire in history fell after homosexuality emerged in its culture. However, he regularly argues that homosexuality is a recent phenomenon with no historical roots. He did not comment on this inconsistency. Homosexuality is generally frowned upon in Uganda and is illegal. Minister Buturo, who is a born-again Christian and is actively opposed to homosexuality, came to show his support at the rally. "Must press freedom be used to subvert one of our cardinal founding laws?" the minister said in reference to the recent string of articles published on homosexuality.

The Interfaith Coalition document delivered to Dr Buturo declares that homosexuality breaks three laws at once: it is against the law of God, the law of nature, and the law of the land.

The document claims that "the majority of Ugandans consider homosexuality culturally repugnant and hostile to civilized society, equity, morality, and the dignity of human nature".

Former Anglican Bishop Christopher Ssenyonjo said he supported everyone's right to publicly voice

concerns, but felt that the language used at the rally was inappropriately threatening. "Their use of threatening language is very un-Christian said Bishop Ssenyonjo, who has ministered to gays. "We are no longer in the era of an eye for an eye. The Lord taught us to respect each person, however different, as full human beings."

On Aids and homosexuality, Dr Paul Semugoma said that "Aids is not a homosexual disease, but homophobia keeps gays from seeking health services, which hurts everyone".

He rejected the idea that homosexuality causes HIV/Aids. He said that Aids treatment programs should provide outreach specifically to homosexuals. Said Dr Semugoma: "Are we saying that Uganda has the most homosexuals in Africa because our HIV/Aids rate used to be one of the highest in the world? No!"

Meanwhile, Deputy Attorney General Fred Ruhindi has denied reports that he had ordered the arrest of homosexuals as some FM radio stations were reporting in Kampala yesterday afternoon.

"I said the law says [homosexuality] is an offence, but the power to arrest is with the police," Mr Ruhindi said, adding that "if anyone wishes to have a different position on the law, they can go through the normal legal channels to pass an amendment".