
In Connection with
Abuses and Human Rights Violations and Election Irregularities of
the Government of Uganda and Its Officials in the Campaign for the
Presidency of Uganda

REPORT ON GOVERNMENTAL ABUSE, VIOLATIONS, AND
MISCONDUCT IN ADVANCE OF THE JANUARY 14, 2021
PRESIDENTIAL ELECTION AND ITS AFTERMATH

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EXECUTIVE SUMMARY¹

Uganda's presidential election was held January 14, 2021 preceded by weeks of government-sponsored violence; the arrest of opposition candidates; the kidnapping of party and campaign staff held at undisclosed military locations; the repeated arrest of opposition leader Robert Kyagulanyi (a/k/a/ Bobi Wine) in particular;² the killing by the military of at least 54 protestors and bystanders between November 18-20, 2020 and the wounding and mutilation of hundreds; (children, in particular, were targeted as shown in this report). Such violence was accompanied by the arrest and detention of lawyers working for opposition candidates. Two days before the election, the military fanned out throughout Uganda's towns and cities, giving rise to an atmosphere of terror and coercion that compelled many, perhaps most, voters to stay home.

Extensive evidence of election tampering, pre-marking of ballots for General Museveni, ballot-stuffing, coercion of voters by the military, shutdown of all communications prior to the election, arrest of campaign staff and candidates, the lack of voter privacy, illegal casting of votes before voters arrived at polling stations, reports of 100%, 99% and 98% vote for Museveni at large numbers of polling sites, entire districts reporting 100% vote for Museveni, and other fraudulent acts and irregularities, are addressed at Part III "Irregularities In Connection with the January 14, 2021 Election" at pp. 29-48.

In the week prior to the election, the Electoral Commission banned campaigning in most of Kampala and other towns. The pretextual purpose of such ban was to prevent gatherings due to COVID-19 but the regulation was applied only to urban strongholds of Bobi Wine or

¹ Video and audio links are included (where possible) in this document; alternately, please view links here: https://youtube.com/playlist?list=PLv9abktBZkGrreuFgQEdkU6_0HxrgmPoe. Go to "Elections Irregularities" folder and then to "Evidence of Citizens" folder.

² Mr. Wine's given name is Robert Kyagulanyi and he is a member of Uganda's parliament. At certain points his given name and professional name are occasionally used interchangeably.

his National Unity Platform (NUP). <https://www.ec.or.ug/news/ec-suspends-campaign-meetings-specified-districts>. The Economist noted that the purpose of such regulations was to burden the Wine campaign. <https://www.economist.com/middle-east-and-africa/2021/01/02/after-34-years-ugandas-president-has-no-intention-of-retiring>.

The election itself was held in an atmosphere of repression and coercion. Military personnel and police fanned out throughout Uganda beginning the day before the election. Trains of armed personnel carriers and other military vehicles snaked through Kampala and other towns and cities, as seen on this excerpted video. https://youtu.be/ZQ8_8GyFOKA. The purpose of such deployment was to coerce Ugandans by a show of force from engaging in protest following the election and to fear turning out to vote. Soldiers routinely beat civilians who supported Bobi Wine or carried opposition signs, as seen in this video taken in Kampala in which two uniformed men repeatedly beat a man with batons who was wearing NUP red; as the video shows, he had committed no illegal act or wrongdoing. <https://twitter.com/PatriqKanyomozi/status/1348963681065971717?s=20>.

In a typical example of the government's brutal treatment of the opposition, on December 27, 2020 a Bobi Wine campaign aide was chased by soldiers and severely beaten by four soldiers with batons, as seen in this video. <https://www.dropbox.com/s/5vg31gfvkuorqll/VIDEO%20Man%20Beaten%20by%20Soldiers%20-2020%20-12-28-10.mp4?dl=0> Soldiers, armed or with batons, patrolled nearly all polling places; in many cases large groups of soldiers voted en masse at polling places though they normally would vote at their barracks, the purpose being to maintain a military presence at civilian voting stations. For example, at one polling station four soldiers drag an elections agent for NUP out of the polling premises. <https://youtu.be/mZGHJaFRqzY>.

The election failed all norms of voting privacy. Voting frequently took place in the presence of government officials and often police and soldiers who, surrounding a voter, told them how to vote. See e.g. <https://www.facebook.com/www.bobiwine.ug/posts/10160595683603012>. Officials often closed polling places early, directed voters to vote only for parliament members or handed voters ballots pre-marked for General Museveni, the incumbent whose name conveniently was last on the column to facilitate easy and rapid check-off en masse. <https://www.facebook.com/www.bobiwine.ug/videos/477864099873168/>. Blank ballots were randomly distributed and, in many cases, large pads of ballots were freely available to officials to premark. Ballot boxes were not locked and secured. Instead, they contained removable lids and large openings to facilitate ballot stuffing, as shown on some videos. An example of these abuses can be seen from the Bulambuli polling station where dozens of ballots are shown being pre-marked for Museveni. <https://youtu.be/TggSh1kUvTo>. These abuses are documented in Part III of this Report at 29-48.³

³ If only one hundred ballots were pre-marked in this manner at each of Uganda's 34,000 polling stations, this would mean an additional 3.4 million votes for Museveni. This would more than make up the difference between the Electoral Commission's claim that Museveni received 6,042,898 votes to Kyagulanyi's 3,631,437 votes. <https://www.ec.or.ug/news/publishing-final-results-presidential-elections-2021>. In other words, the extensive evidence of pre-marking of ballots for Museveni demonstrates that the election result lacks validity and should be overturned.

Cameras and phones were banned officially from polling places, depriving citizens in most cases of the capacity to document abuses. As a result, few videos have been smuggled out of Uganda via the internet and the election largely took place in darkness. Uganda's normal practice of allowing citizens to witness the counting of votes at the nationwide 4 PM close of voting was banned by order of the Electoral Commission. <https://www.independent.co.ug/voters-will-not-be-allowed-to-witness-vote-counting-ec/>. National Unity Platform (NUP) party agents and poll watchers, along with other staff were taken into custody by the military immediately before the election. The NUP is the party formed by Hon. Kyagulanyi, who emerged as the leading opposition candidate. Those NUP staff and leadership detained have not been and have not been brought before Uganda's courts within 48 hours as the Constitution of Uganda requires. Instead, they have been transferred to military custody to avoid civil process.

Prior to the election, vast numbers of Uganda registered NGO's were decertified or delisted by government order, the purpose being to prevent pollwatching organizations from obtaining funds to manage and finance ballot supervision. <https://www.independent.co.ug/ngo-bureau-suspends-operations-of-national-election-watch-uganda/>. NGO's, voters and party observers were unable to observe the vote count and identify abuses. Such civil liberties abuses have been noted in the international community. See e.g. <https://www.civicus.org/index.php/media-resources/news/4817-uganda-egregious-measures-threaten-free-and-fair-elections> (Civicus International); <https://www.hrw.org/news/2021/01/21/uganda-elections-marred-violence> (Human Rights Watch).

Compounding the absence of observers, Uganda ordered its telecommunications authority to close all social media apps and platforms immediately prior to the election, <https://www.reuters.com/article/idUSL1N2JN0SH>, eventually extending such closure to the entire internet, shutting all internet service in Uganda from Wednesday, January 13, 2021 through at least Monday, January 18, 2021. Such strategy was intended to prevent citizens from documenting voting abuses on the internet and to prevent campaigns from moving poll watchers to voting stations and to prevent candidates from motivating their supporters to vote. A nation of 45 million people lost all modern communications the day before the election, continuing for nearly a week after the election. Government-controlled broadcast media was not impeded. A letter ordering closure from the Uganda Communications Commission (UCC) gave no reason for the shutdown. <https://twitter.com/nbstv/status/1349404534536351744/photo/1>. The internet shutdown was arbitrary and did not come about through any factfinding or rule making procedure on public notice or with hearings. The UN Special Rapporteur has noted the internet shutdown's impact on the election process. <https://twitter.com/cvoule/status/1349308270058614784>.

Loss of the internet shutdown prevented private media from covering the election and its aftermath. As the Committee to Protect Journalists (CPJ) noted, private websites such as Uganda's Observer (<https://www.observer.ug/>) stopped publishing news and tweets, while state-owned Uganda Broadcasting Corporation (UBC) was able to continue updating its websites. <https://cpj.org/2021/01/internet-access-cut-social-media-banned-during-uganda-elections/>.

The internet shutdown interfered with the prompt collating of voting results. Ordinarily, Uganda uses an internet-based system for collecting and forwarding voting responses but could not due to the Internet shutdown. No evidence has been presented as to how the vote tally was conducted in the absence of the internet. The Electoral Commission claimed “We are not using local internet to transmit our results, we are using our own system” but did not identify any other voting transmission system or method in operation, <https://www.reuters.com/article/us-uganda-election-idUSKBN29K0Q5>, nor has any been identified in the Commission’s regulations. The lack of internet access also prevented use of biometric scanning machines to identify voters, further delaying voting, <https://findbiometrics.com/biometric-voter-machines-fail-after-ugandan-president-shuts-down-internet-during-election-011407/>, a process that discouraged voter turnout, prejudicing the opposition.

The Electoral Commission disclosed that at least 1,200 polling stations were not counted because the Commission claimed it had a 48-hour period to report a result and could not obtain such information in time from these polling stations. These uncounted stations were situated in Kampala and other communities where Bobi Wine was otherwise polling 75% of the returns that were counted. <https://www.monitor.co.ug/uganda/special-reports/ec-excludes-results-from-over-1-200-polling-stations-3260542>. As to the 1,200 stations, the Electoral Commission conceded their exclusion only when confronted by the Daily Monitor news organization; it is unclear how many other polling stations in NUP strongholds were ignored by the Electoral Commission and not counted.

Following the election, a reign of terror has descended upon Uganda’s opposition, primarily the NUP and Bobi Wine. NUP staff and officials have been hunted down throughout the nation, including its Assistant General Secretary who was arrested; the party’s General Secretary escaped custody but a laptop containing Declaration Returns (DR’s), the duplicate of voting data provided to each campaign that allows a cross-reference between the number of persons registered and those voting, was taken by security forces and not returned to the NUP. Security forces raided the NUP’s party headquarters on or about January 18, 2021, arrested its remaining personnel, confiscated all files and locked the facility. The purpose of such raids and arrests was to obtain the DR’s that were in the lawful possession of the NUP and that could identify election abuses throughout the country. <https://www.monitor.co.ug/uganda/news/national/police-army-cut-off-bobi-offices-home-3261406>

The NUP and the Wine campaign cannot document excess votes at polling stations above the registered voters because the government raids resulted in the loss of such data.

In the most notorious post-election act, after voting on Thursday, January 14 Mr. and Mrs. Kyagulanyi, along with their gardener and a single remaining campaign aide, and their 18-month old niece, were placed on house arrest, their compound surrounded by hundreds of soldiers and at least a dozen military vehicles. For 11 days (until January 26, 2021) no visitors were permitted except lawyers on a single occasion (and only after the Kyagulanyis’ food supply had run out). Soldiers and police patrolled inside the perimeter of their compound. The Kyagulanyis were forcibly brought back into their home each time they have attempted to leave. Barbara Kyagulanyi was manhandled and hauled back into

the house by soldiers after she attempted to bring in food from their garden. See Part III of this Report .

In sum, a leading opposition candidate and a member of Parliament and his family were kept in custody and isolation for 11 days after the election, a critical time for any political party to be able to reach supporters, lawyers and researchers. Even the U.S. Ambassador Natalie E. Brown was barred from entering. <https://www.voanews.com/africa/uganda-accuses-us-meddling-after-ambassador-tries-visit-opposition-candidate>. The military even prohibited the father of Barbara Kyagulany's 18-month old niece (who had been staying with them) from picking up his baby daughter. She, too, was held in house arrest. <https://twitter.com/HEBobiwine/status/1351501734569529345>. The Uganda government claims it took such action to prevent rioting. Despite this brutal treatment, no charges were lodged against them. On January 25, 2021, the Uganda court ordered the military to stand down. <https://www.voanews.com/africa/uganda-court-orders-opposition-leader-released-house-arrest>.

Extensive evidence has emerged, despite the limitations imposed by the government, that the election was fraudulent. Videos smuggled out of Uganda document repeated instances of literal ballot stuffing, premarking of ballots, destruction of Kyagulanyi ballots, the absence of voter privacy, the direction by soldiers that voters should mark their ballots for Museveni, the high military presence at polling places, among other irregularities. In addition the Electoral Commission's final report on the outcome of the election demonstrates openly that in multiple districts the vote was listed as 100% for Museveni. In fact, in 348 polling stations the vote was 100% for Museveni while in hundreds of other stations, equally impossible voting returns of 99% and 98% were commonplace. These matters are addressed at Part III of this Report.

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PART I: VIOLENCE AND COERCIVE MEASURES PRECEDING THE UGANDA ELECTION

Beginning November 18, 2020 the Uganda government initiated a pattern of violence and abuses designed to intimidate voters and opposition parties, particularly Bobi Wine and the NUP. On this date Bobi Wine was arrested by Uganda security forces for allegedly violating anti-COVID regulations for appearing at a political rally and was charged with spreading a communicable disease.

From November 18, 2020 to November 20, 2020, when he was released on bail, at least 54 protesters (demanding Bobi Wine's release) and bystanders were killed by the Uganda military and police who acted under "shoot to kill" orders from Uganda Security Minister Elly Tumwine. Hundreds of others were grievously wounded, including persons mutilated by bullets and tear gas canisters fired wildly into crowds or who were run over by military or campaign vehicles.

These actions interfered with a neutral and civil election process, to impose an atmosphere of terror upon the electorate before the election and to create an appearance of danger for those who engage in political participation to favor the ruling party and General Museveni, in particular. These are addressed below.

"SHOOT TO KILL" ORDERS ISSUED BY SECURITY MINISTER TUMWINE

Uganda Security Minister Tumwine issued the "shoot to kill" orders directed against civilian demonstrators. Widespread use of shoot to kill, beatings and other violence have been practiced by the Uganda police and military since 2018 and, in particular, since the November 18, 2020 arrest of Bobi Wine at a campaign event.

Security Minister Tumwine stated broadly and generally that "police have a right to shoot you and kill you if you reach a certain level of violence" without defining the point at which police could use deadly force. Tumwine stated: "Can I repeat? Police have a right to shoot you and you die for nothing....do it at your own risk." See <https://www.bbc.com/news/world-africa-55016519>. No guidelines or regulations were released by Tumwine or any agency under his authority governing or restraining the "shoot to kill" authority.

On November 20, 2020 Tumwine directly threatened political protestors:

"We can act in a very short time...those who think they can cause a disruption even if you take us by surprise as was on the 18th, when we organize we shall put you in your place." See NTV <https://youtu.be/hOUTmbAkka28?t=79>

Minister Tumwine's "shoot to kill" instructions are part of a regularized pattern and practice of the Uganda government. In late 2019, Colonel Felix Abucha, the deputy commander of the Local Defense Units [LDU] in Kampala publicly stated that shoot to kill orders would be applied even to non-violent offenses such as "stealing":

"We want a very free Kampala, we want our people to enjoy peace throughout and for us **we are not like the police sincerely speaking; we fire to kill, if you want to steal, you will die; sincerely speaking we shall kill you. We are here, we shall kill you.** Whether you are our friend, whether you are with us in uniform but

we get you stealing, **we shall not spare your life, we shall take your life** and that's the order; people should know that."

"We have started and you have seen on television. For us we shoot to kill. We are not breaking people's legs. We shall shoot to kill; the head and the chest are our target. If you play around with our Ugandans, we shall kill you. If you prepare to come and steal at night, you will lay down in your blood..."

Colonel Abucha's statement was first aired on BBS Terefayina, a Buganda kingdom-owned television station in the Buganda subdivision of Uganda, and reported on January 1, 2020 in The Observer, a Uganda based media outlet. See <https://observer.ug/news/headlines/63062-army-gives-ldus-shoot-to-kill-orders> [emphasis added].

INCITEMENT BY GENERAL YOWERI MUSEVENI

The violence directed at protestors beginning in or about November 18, 2020 is also the product of incitement by General Museveni.

On August 18, 2020 in a speech given at an on-line conference of Museveni's National Resistance Movement, his political party, the General stated that opposition protestors would "be crushed". He stated: "You will see what NRM means. We are going to crush those criminals." <https://youtu.be/UYI2LQegDu4>.

Museveni's Endorsement of Police Beatings of Bobi Wine

At a graduation ceremony on August 21, 2020 for 4,809 new police recruits Museveni told the recruits that the August 2018 beating of Bobi Wine was correct and appropriate, a direct act of incitement to violence against a sitting member of the Uganda Parliament and candidate for president. On this occasion Museveni directly endorsed beatings and violence upon Bobi Wine:

"The other day there was a fracas in West Nile where our young friend Bobi Wine was ... fighting with security people and I think they beat him a bit... And then they came and said, oh, a member of parliament was beaten. Well, I said, OK let me study how he was beaten. Now when I studied I found the men had beaten properly, in the right way." [Laughter and applause are heard at this point, and others, on the tape].

Museveni's comments, in full, describing his validation of the beating of at the Hon. Kyagulanyi, a member of Uganda's parliament have been publicly recorded at the graduation ceremony and a video file is available. See <https://youtu.be/vMTAawsHC-TU>.

Museveni: "Nobody has more guns than us."

On November 2, 2020 while he was accepting his National Resistance Movement's nomination, Museveni stated openly that his government would use force against political opponents and protestors:

"They are planning all sorts of stupid things to disrupt the election process. The ones who want to disturb our peace, don't try because we shall deal with you. Whoever tries will regret. Nobody should be intimidated by these crooks. I am already president and want to come back. The ruling party fought to bring peace in

this country. ***Nobody has more guns than us.*** See <https://pearlradio.co.ke/2020/11/04/uganda-opposition-candidate-arrested-after-presidential-nomination/>.

The Associated Press reported identical comments. <https://apnews.com/article/yoweri-museveni-elections-bobi-wine-arrests-uganda-cbbbe0c26dfca3485f0a99b5f35296b6> [emphasis added].

Museveni's November 19, 2020 threat to opposition parties

On November 19, 2020 Museveni threatened protestors again, this time describing them as being the work of foreigners who do not like “our stability. . . but they will discover what they are looking for. . .they will soon lose that appetite...whoever started it will regret...”. In this same speech, Museveni describes the Bobi Wine campaign as financed by foreigners, and, in particular, foreign “homosexuals”, appealing to a latent prejudice in Uganda as a further means of inciting violence against NUP and its supporters. Museveni's statements are recorded at the following video: <https://youtu.be/A0MAf0znaec>; see also <https://www.matookerepublic.com/2020/11/20/those-attacking-nrm-people-in-riots-will-soon-lose-appetite-we-area-fighters-and-they-are-entering-an-are-we-understand-museveni/>.

Museveni calls opposition parties “criminal gangs” Cites Biblical threat of death to sinners November 30, 2020

In a November 30, 2020 speech, following the violence that left 54 civilians dead and hundreds wounded, many mutilated for life, Museveni condemned all opposing political parties, calling them “criminal gangs”. He made the following statement relative to the use of force on civilians participating in the political process:

“In the book of Romans Chapter One, Verse 32, it says, ‘Who, knowing the righteous judgement of God, that those who practice such things are deserving of death, not only do the same, but also approve of those who practice them.’”

<https://www.voanews.com/africa/uganda-president-quotes-bible-ominous-message-opposition>. In giving this address, Museveni directly threatened the civilian population with military reprisals if it voted to support the opposition. He delivered the speech wearing a military flack jacket. Such statement was designed to enhance an atmosphere of fear and terror to influence the election against the opposition candidates and to validate the use of violence by the military and police.

PRE-ELECTION VIOLENCE DIRECTED AT BOBI WINE

These threats of violence are not abstract but have been carried out by the government of Uganda during the election campaign. Bobi Wine, in particular, has been subject to multiple arrests, beatings and attempted murder in connection with his campaign for the presidency of Uganda.

THE NOVEMBER 3, 2020 ARREST OF BOBI WINE AND CANDIDATE PATRICK AMURIAT

On November 3, 2020, Bobi Wine was arrested, detained and tortured for several hours after he filed his papers for candidacy at the Election Commission in Kampala.

He was pulled out of his vehicle and forced into a police van where he was beaten and physically abused. The brutality of the arrest can be seen in the attack on Mr. Wine's campaign vehicle by at least a dozen armed riot police who viciously began destroying the car, as seen in this NBS video: <https://www.facebook.com/watch/?v=678644892674996>. Mr. Wine was eventually driven to his home while police remained heavily deployed in the neighborhood. Wine has made the following public statement concerning the arrest and abuse:

"The torture, the beating took place in the police vehicle where I was detained for close to three hours.

"They sprayed me with tear gas... hot metal was placed in my hands, I have scars all over, my whole body hurts."

These comments were reported by Agent France Presse (AFP). See <https://www.barrons.com/news/uganda-s-bobi-wine-detained-after-filing-presidential-candidacy-01604410207>.

Also arrested when attempting to register was Patrick Amuriat of the opposition Forum for Democratic Change, another leading opposition candidate. Mr. Amuriat has been arrested nine times since his nomination, all under the pretext of traffic violations. On one occasions while campaigning he was arrested for "riding on top of a vehicle contrary to the Road Safety and Traffic Act", a pretextual charge against a campaigning politician. <https://www.monitor.co.ug/uganda/news/national/police-detain-amuriat-four-days-to-election-3252776>.

The police justified such arrests on the ground that they "feared" the candidates had "plans of holding illegal processions," as reported by the Associated Press. <https://apnews.com/article/yoweri-museveni-elections-bobi-wine-arrests-uganda-cbbbe0c26dfca3485f0a99b5f35296b6>.

THE NOVEMBER 18, 2020 ARREST OF BOBI WINE GOVERNMENT SHOOTINGS OF PROTESTERS AND BYSTANDERS

Video released on 11-19-20 by AFP shows Bobi Wine being forcibly arrested and forced into a personnel carrier. .

Following Wine's arrest, the AFP video depicts military figures patrolling Kampala; one is seen loading a machine gun and others are seen firing randomly towards civilians.

The AFP video depicts multiple instances of military figures firing upon civilians. None of the civilians are shown to be armed. See <https://youtu.be/DTPGBwre4Ow>.

INDISCRIMINATE FIRING AT CIVILIANS ON NOVEMBER 24, 2020

A CNN Video Report, released November 24, 2020 states that police and military fired at populated crowds to force their dispersion:

"Witnesses described a chaotic scene with police, the military and plainclothes gunmen firing rifles in heavily populated areas to try and disperse the protestors."

A police spokesman whose face was masked at a press event at the government-owned Uganda Media Center confirmed abusive and excess use of force against civilians, stating,

“That there were quite a number of incidents where the officers “allegedly conducted themselves unprofessionally”.

CNN Video Link: <https://youtu.be/VOIJOZYRhJM>. A typical example of indiscriminate firing appears in this video in which plainclothes officers fired randomly and indiscriminately into the air in civilian areas. <https://twitter.com/observerug/status/1329335187126280193>.

UGANDA GOVERNMENT REFUSES TO RELEASE RECORDS OF CIVILIAN CASUALTIES

Hundreds of civilians are believed to have been shot or beaten by police and military personnel from November 18-20 but the exact number is not known as records have not been released by Uganda. Dr. Joyce Kaducu, State Minister for Primary Health Care reported that at Mulago Hospital in Kampala 48 gunshot victims were admitted to this single facility on November 18, 2020, the date of Mr. Wine’s arrest, with 14 more victims admitted the following morning. <https://youtu.be/ULFsoVR5Vfs>. It is believed that several hundred persons were injured between November 18 and 20, 2020 but the government has not released figures for other hospitals. As the photographic and video evidence below shows, victims of grievous and mutilating wounds were left unattended in the streets.

ARREST AND BEATING OF *GHETTO TV* JOURNALIST ASHRAF KASIRYE

During the November 18, 2020 arrest of Mr. Wine, Ghetto TV journalist Ashraf Kasirye was left unconscious after being pepper sprayed by police officers during Bobi Wine’s arrest in Luuka District. A photograph depicting the arrest of Mr. Kasirye in which he is manhandled by three uniformed soldiers appears below:



<https://www.monitor.co.ug/uganda/news/national/police-beat-up-journalists-covering-bobi-wine-campaign-trail-3226432>. As set forth below, Mr. Kasirye was shot in the head at another campaign event on December 27, 2020.

ATTEMPTED MURDER OF BOBI WINE AND FRANCIS ZAAKE ON DECEMBER 1, 2020

On December 1, 2020 Bobi Wine and his close political associate, Uganda MP Francis Zaake, were fired upon by the military in the vicinity of Kayunga while driving toward Jinja, a campaign destination. MP Zaake is a leading member of Uganda's parliamentary opposition.

Police fired into the windshield, narrowly missing Mr. Zaake and Mr. Wine's driver who were in the front seat of the passenger vehicle.

In these photographs, Mr. Wine can be seen pointing to the bullet entry points on the windshield.



The second image in the set depicts the bullet entry in the windshield immediately to the side of MP Zaake while he is positioned in the front passenger seat; the entry point demonstrates the military's intent to kill the occupants of the car.

Multiple shots were fired at the campaign vehicle. For instance, the lower left hand image depicts a second bullet entry on what appears to be the wheel frame. The lower right-hand image depicts a destroyed passenger side front tire from a bullet.

As the windshield images plainly depict, the bullet was fired in a manner intended to cause the death of M.P. Zaake and comprises attempted murder of Zaake, the driver and/or Robert Kyagulanyi.

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BEATING OF SIX JOURNALISTS BY SECURITY FORCES

December 11, 2020

On December 11, in Lira, Uganda government security personnel violently beat a group of six or more journalists covering MP Kyagulanyi's campaign.

Busoga One FM reporter Moses Waiswa; BBS Terefayina reporter/anchor Ssesanga Batte; NTV Uganda reporter John Cliff Wamala; Bukedde TV Reporter David Tamale; Pearl of Africa Radio Atusingwize Jonan; Ghetto Media reporter Ronald Mugenyi were among the journalists beaten by security personnel.

Accordingly to reports and statements by the journalists, they were beaten with the butts of guns and batons. The reporters suffered head injuries, broken bones, brain injuries, and lacerations and bruising throughout their bodies.

The beatings were covered by multiple media organizations including Daily Monitor, HMJ Uganda and CPJ. See <https://www.monitor.co.ug/uganda/news/national/police-beat-up-journalists-covering-bobi-wine-campaign-trail-3226432>; <https://www.hrnjuganda.org/journalists-covering-presidential-candidate-kyagulanyi-brutally-attacked-by-security-forces/>; <https://cpj.org/2021/01/police-beat-detain-journalists-covering-opposition-candidates-ahead-of-uganda-elections/>.

Moses Waiswa, a reporter for Busoga 1-FM, was severely beaten in the head and rushed to hospital in critical condition and hospitalized for two days as a result of the severity of his head injuries. He, too, was beaten while covering the Wine campaign outside Lira; according to reports he still suffers from headaches and complications of the beatings. In this photograph showing his head and facial injuries, Mr. Waiswa's press pass identifying him as a reporter for Bosugo 1-FM is plainly visible:



Photographs showing journalist Waiswa's injuries while receiving triage appear below:



These experiences have been common to many journalists covering the campaign. See <https://www.monitor.co.ug/uganda/special-reports/elections/monitor-journalists-share-their-experiences-on-campaign-trail-3257874>. The regime has used a practice and policy of abuse of journalists to discourage coverage of opposition candidates' campaigns, especially Bobi Wine.

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ATTACK BY UGANDAN MILITARY POLICE

December 27, 2020

On December 27, 2020, during a peaceful campaign rally, Mr. Kyagulani's bodyguard Francis Senteza, was murdered by Military Police in central Uganda during a campaign stop.

According to reports and witness statements, Mr. Senteza died from wounds sustained after being crushed and run over by a Military Police truck. Reports confirm Senteza was attempting to aid Ashraf Kasirye, the journalist, who sustained a serious head injury after MP's shot him in the head with a tear gas canister. Bobi Wine announced the killing of Senteza and identified the number plate of the military vehicle that killed him:

"I regret to announce the murder of my security team member Francis Senteza Kalibala aka Frank. He was deliberately run over by military-police truck, No. H4DF 2382, which blocked us in Busega on our way to Rubaga to get Kasirye Ashraf emergency medical attention." Source: Reuters, December 27, 2020 retrieved from: <https://ca.news.yahoo.com/ugandas-bobi-wine-says-bodyguard-170638095.html>.

On this same occasion, Mr. Wine's media consultant and also journalist Ashraf Kasirye were shot in the head, as per the photograph of Kasirye below:



A video depicting the injury to Mr. Kasirye and the efforts by NUP security to bring him to an ambulance can be accessed at: <https://youtu.be/zwRHFprM4DE>.

During this same incident, Ali Mivule, a journalist from television station NTV, was struck by a tear gas canister fired on civilians and journalists by Ugandan Military Police. Mr. Mivule survived the incident. See Rodney Mhumuza, Associated Press, December 27, 2020, <https://apnews.com/article/kampala-coronavirus-pandemic-uganda-bobi-wine-6d9d870f0da33e44dbb108863144301e>.⁴

⁴ See also <https://www.pmldaily.com/news/2020/12/bobi-wine-visits-frail-ghetto-media-journalist-Ashraf-kasirye-in-hospital.html> ; Rodney Mhumuza, Associated Press, December 27, 2020, <https://apnews.com/article/kampala-coronavirus-pandemic-uganda-bobi-wine-6d9d870f0da33e44dbb108863144301e> .

ARREST, DETENTION AND ATTACK ON KALANGALA ISLAND

December 30, 2020

As a prelude to destabilizing the campaign, on December 30, 2020, while on a routine campaign stop in Kalangala Island, Lake Victoria, Uganda, Bobi Wine was arrested along with his campaign staff and transported via helicopter to Kampala where he was released with no charges filed.

All 124 campaign staff members were arrested, separated from M.P. Kyagulanyi (Bobi Wine) and detained at an unknown location for an indeterminate period; to date the status of these and other detained NUP staff is unknown. A court ordered bail for 85 staff members but none have been released and it is believed they were transferred to military custody. A court ordered bail for 85 staff members but none have been released and most have been transferred to military custody. This week a military court set a bail application for at least 49 of these civilians for February 8, 2021, 40 days after the date of arrest. <https://www.monitor.co.ug/uganda/news/national/nubian-li-eddie-mutwe-and-47-other-bobi-supporters-further-remanded-3276214>

On January 8, 2021, 49 of the campaign staff arrested in Kalangala were produced in a military court and charged with possessing Ugandan army weapons, as reported by Human Rights Watch. <https://www.hrw.org/news/2021/01/21/uganda-elections-marred-violence>. The remainder of the 124 campaign staff have not been seen or produced by the government.

After being separated from his staff, Kyagulanyi was forcibly escorted to his home by helicopter by at least ten soldiers; his home was then surrounded by the Ugandan military. Once they had removed Kyagulanyi, the Ugandan Police fired tear gas into civilians who had gathered for the campaign event on Kalangala Island.

These events occurred during a peaceful campaign rally in which the only violence was perpetrated by Ugandan Police on unarmed civilians, as reported by Reuters and Voice of America. <https://www.reuters.com/article/us-uganda-politics/uganda-opposition-candidate-bobi-wine-arrested-police-fire-tear-gas-at-protesters-idUSKBN29419V?edition-redirect=uk>; <https://www.voanews.com/africa/uganda-authorities-arrest-bobi-wine-during-campaign-stop>.

As reported in the Daily Monitor, January 9, 2021, many of the arrested campaign staff showed signs of abuse and torture when they appeared in court:

“When they appeared in court after five days of detention, dozens of them appeared to be limping as they hopped out of the prison truck at Masaka Magistrate’s Court. They later displayed wounds on various parts of their bodies before the court as they pleaded for mercy, saying they had been tortured.”⁵

The attack and arrest on Kalangala were a premeditated and planned assault on the campaign. Police were observed bringing vans and personnel onto the island’s ferry ahead of the rally, as the Economist’s correspondent reported. <https://www.economist.com/middle-east-and-africa/2021/01/02/after-34-years-ugandas-president-has-no-intention-of-retiring>.

⁵ <https://www.monitor.co.ug/uganda/special-reports/elections/bobi-wine-s-lonely-walk-to-election-day-3251966>

ARRESTS OF OTHER POLITICAL FIGURES ON CHARGES OF TREASON

Former Olympic boxer Justin Juuko was arrested on December 12, 2020 and detained for 19 days in army custody on charges of treason. See <https://www.monitor.co.ug/uganda/news/national/former-boxer-justin-juuko-released-3244322> .

Mr. Juuko was arrested with a colleague, Mr Garrypaul Mayanja; both were supporters of the Opposition Forum for Democratic Change that, along with Mr. Wine's party, opposes the Museveni regime.

They had been arrested by the Chieftaincy of Military Intelligence (CMI) on charges of treachery under Section 129(C) of the Uganda People's Defence Force (UPDF) Act and illegal possession of firearms, the same charges ultimately used to continue the detention of Mr. Wine's staff.

The two were accused of allegedly training and mobilising youth from Kyengera, Kamnengo, Lukaya, Masaka, Kyabakuza and Lyantonde "on how to use martial arts, small arms (pistol and SMG) and catapults against Ugandans after the January 14, 2021 elections."

No apparent basis existed for these charges and none was offered in court and their detention appears to have arisen from their role in a political opposition party.

Mr. Juuko and Mr. Mayanja were released after 19 days without charges being lodged against them.

[CONTINUED NEXT PAGE]

ASSAULT AND TEAR GASSING OF BOBI WINE BY UGANDAN POLICE DURING INTERNATIONAL PRESS CONFERENCE January 7, 2021

On January 7, 2020 MP Kyagulanyi convened a press conference with most of the world's major media via video conference to announce the filing of a Criminal Complaint with the International Criminal Court against President Yoweri Museveni and other officials relative to human rights abuses, violence, unlawful arrests, torture, political oppression and killings. An international event, it was attended by the Associated Press, Reuters, The Wall Street Journal, CNN, The New York Times, Vice News, Al Jazeera and The Guardian, among others, along with representatives of NGO's.

During the press conference, conducted from Mr. Kyagulanyi's campaign vehicle, Ugandan Military Police with their nameplates and badges removed, pulled a troop transport alongside Mr. Kyagulanyi's vehicle and followed at a close range.

Multiple times during the press conference this military vehicle fired tear gas canisters at and into Mr. Kyagulanyi's vehicle and fired bullets in the air over and in front of the campaign vehicle.

At one occasion, Mr. Kyagulanyi's vehicle stopped on the roadside, and Ugandan police approached demanding the vehicle be moved from its parked location. After refusing to move the car (that was on a rural road and not obstructing traffic), Ugandan Police, with badges and nameplates removed, forced entry into Mr. Kyagulanyi's vehicle and dragged him by the head and neck onto the roadside onto his knees. Police proceeded to tear gas and assault Hon. Kyagulanyi, and then fired dozed of bullets into the air and ground as he was held down on the roadside.

After approximately five (5) minutes, MP Kyagulanyi returned to his vehicle, where he resumed his press conference with video before global media. This event was widely reported on by Reuters, the Associated Press and others. See <https://www.reuters.com/article/uk-uganda-election-bobi-wine/ugandas-bobi-wine-asks-icc-to-investigate-rights-abuses-idUSKBN29C2JI?edition-redirect=in>; <https://www.vice.com/en/article/k7an9z/ugandan-opposition-leader-bobi-wine-tear-gassed-during-zoom-call>; <https://apnews.com/article/bobi-wine-yoweri-museveni-courts-elections-east-africa-f558e3f678c47f0e6a26a97bc015d5ab>.

Video footage of the press conference in which Kyagulanyi is forcibly dragged out of the vehicle and repeatedly fired upon appears on the following link: https://m.facebook.com/story.php?story_fbid=4100400283304725&id=1059157787460669.

This incident occurred during a private, press conference held via video conference from Mr. Kyagulanyi's vehicle. No crowds were present. Mr. Kyagulanyi and his staff were peacefully driving through villages in the surrounding areas of Kampala when they were violently attacked.

During the press conference, Mr. Kyagulanyi stated that earlier on the same day, January 7, 2021, his campaign and vehicles were stopped by Ugandan Police and twenty-three (23) of his staff were unlawfully arrested, with no provocation or illegal activities.

This incident demonstrates the repeated pattern of unlawful violence, arrest and individuation undertaken by the Museveni Regime against his electoral opponent, Mr. Kyagulani, a sitting Member of Parliament.

PART II: SHOOTINGS, MUTILATIONS AND BEATINGS OF UGANDAN CIVILIANS BEGINNING NOVEMBER 18, 2020

In the eight weeks preceding the election, following the “shoot to kill” orders described above and with the intention to maintain an atmosphere of terror during the campaign, the Ugandan police and military fired indiscriminately at protestors and bystanders. This occurred at protests beginning November 18, 2020 following Bobi Wine’s arrest on that date. This atmosphere of violence and intimidation was designed to create a sense of coercion and fear to suppress opposition political activity and set the stage for suppression of political protest after the January 14, 2021 election. Four representative cases follow:

DEATH OF AMOS SESEGAWA, HIGH SCHOOL STUDENT

Amos Sesegawa, a senior in Lubiri High School, Buloba, was home from school due to closing for COVID 19 and was aiding his mother in her Kampala shop. At 11 AM on November 19, 2020 his mother closed the shop and walked with her son to Cornerstone Plaza on the way to their transport home. Gunshots were heard, Amos was struck and fell to the ground. No ambulance appeared. No police or military officials rendered aid to Amos who was bleeding heavily and was left unattended. A nearby journalist placed him on a motor scooter to be driven to hospital where he later died. See Video, NTV, released November 24, 2020; <https://youtu.be/aBECRHzvcE>.

BEATING OF CIVILIANS FORCED OUT OF A LOCKER BY SMOKE GRENADE

A video depicts two unarmed male protestors, seeking protection by removing themselves to a large metal locker, closing the door behind and closing a switch plate that would prevent viewing of the interior.

Seconds later, a soldier in uniform opens the switch plate from the outside and drops a tear gas or smoke grenade into the locker. Three seconds later there is an explosion and smoke shoots out of the locker.

The soldier then reappears as approximately six occupants emerge while smoke continues to emit from the locker. All of the occupants are unarmed civilians. They walk out of the locker with their hands in the air or outspread but the video depicts the soldier repeatedly beating two of the individuals with a wooden object **as they sit on the ground**.

After this initial beating, the soldier resumes beating the individuals. The civilians had placed their arms in the air to demonstrate surrender at the time of the beatings. The video of the beatings appears on the computer screen on the following Twitter post: <https://mobile.twitter.com/kizzabesigye1/status/1330440056209895425?s=24>.

MURDER OF KAMIYAT NANGOBI AS SHE SERVED FOOD TO CUSTOMERS

Kamiyat Nangobi, one of the first reported deaths, was a waitress shot in the head while she was serving customers food. A witness reported that Ms. Nangobi “was shot by soldiers on a police patrol truck which was driving in a zig-zag way up and down Kampala Road. There were three policemen and three soldiers on the truck.” Two other people were shot next door, at Little Bee Restaurant, but they survived. From <https://www.monitor.co.ug/uganda/special-reports/dreams-cut-short-by-bullets-3250006>.

WOMAN FATALLY ATTACKED BY MUSEVENI CAMPAIGN VEHICLE

What follows is a photograph of a woman, Kevina Nalwadda, at the scene of the protest with her left foot and ankle approximately 90 percent detached after an attack by a yellow Museveni campaign vehicle. The campaign vehicle drove intentionally through a group of protesters and onlookers at the side of the road in Kampala. She is lying in a central square. The first video shows the wreck of the campaign vehicle and that she is moving and attempting to cover the destroyed limb. <https://www.dropbox.com/s/ilpb4sfx75nmel8/VIDEO%20Woman%20With%20Severed%20Limb%20-2020-11-18.mp4?dl=0>. The video, dated November 18, 2020, the date the protests began, shows that no assistance from police or other officials was provided; the woman lays alone with her severed limb in a pool of blood. She later died. A second video shows the Museveni campaign vehicle running deliberately off the road and through the crowd. <https://youtu.be/unHwqlk4KD4>.



INSTITUTIONALIZED PATTERN OF DELIBERATE HEAD, EYE AND OTHER WOUNDS INFLECTED BY MILITARY ON CIVILIANS

Injuries sustained by the wounded all depict the use of blunt instruments on the head, neck, arms, hands and torso or gunshots, typically presenting with a severe injury on the head above either the left or right eye. These are demonstrative of an institutional police practice of using batons to the victims' head. The following images and videos are typical of the beatings and violence inflicted on hundreds of Uganda civilians by police and military beginning November 18, 2020.

[Continued Next Page]

The first photograph below depicts a young man with severe facial injuries incurred at the protests following Bobi Wine's November 18, 2020 arrest:



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The following photograph depicts a young woman severely beaten on November 18, 2020 on the head, face and the left arm and hand:



The next photograph is an image of a middle-aged man with a severe wound to the head above the right eye being escorted for medical help; Bobi Wine is in the image escorting the individual along with other campaign officials:



This is a severely beaten man lying, apparently dead, in the street at the protest of November 18, 2020:



Following is an image of a young man with gunshot wounds on the face, eye and head, lying prone in the street, apparently dead; the head trauma is consistent with the institutionalized practice of the Uganda military and police in striking above and on the eye.



Below is a photograph of a young man, probably below the age of 15, killed with gunshot entry to the chest and severe gash on the left side of his head, lying in a pool of blood, killed at the November 18 protests:



On December 12, 2020 Emmanuel Bwambale, Amuru District Police Commander ordered local police to fire tear gas canisters and live ammunition at crowds supporting Mr. Wine in Elegu, Amuru District.

Ms Yasiin Zubeda, 26, a resident of Lorikowo Village, Elegu Sub-county, Amuru District, lost her left leg when a tear gas canister fired by police landed on her leg as she was waving at Bobi Wine's convoy. Ismail Buga, her husband, has said that doctors told him that the leg, seen dangling, had to be amputated:



(PHOTO/DAVID LUBOWA, Daily Monitor; <https://www.monitor.co.ug/uganda/news/national/woman-loses-left-leg-as-police-block-bobi-wine-rally-in-elegu-3225930>):

Each of these individuals was killed, beaten or mutilated as part of the shoot to kill orders issued by General Museveni and his subordinate officials prior to the election, including General Tumwine, Police Chief Achola and Colonel Abucha, among others, as discussed above. As General Museveni himself made clear, the purpose of the indiscriminate shooting was to create an understanding that force would be used following the election and that the government regarded the opposition parties as, in Museveni's words, "criminal

gangs” to be extirpated. Museveni’s statement to this effect appears at: <https://www.voanews.com/africa/uganda-president-quotes-bible-ominous-message-opposition>. A series of articles by the Daily Monitor outlines some of the lives lost in by the actions of the police and military during the period November 18-20, 2020. Links to these articles appear below:

<https://www.monitor.co.ug/uganda/news/national/november-protests-mechanic-shot-while-buying-food-3251308>

<https://www.monitor.co.ug/uganda/special-reports/lives-we-lost-fruit-seller-hit-while-entering-store-3251032>

<https://www.monitor.co.ug/uganda/special-reports/was-the-guinness-bottle-ssendagire-s-achilles-heel--3248966>

<https://www.monitor.co.ug/uganda/special-reports/lives-we-lost-bullet-hit-eye-of-people-power-fan-3247954>

<https://www.monitor.co.ug/uganda/special-reports/lives-we-lost-27-year-old-lived-for-her-daughter-3248756>

<https://www.monitor.co.ug/uganda/special-reports/lives-we-lost-dream-of-escaping-poverty-cut-short-by-bullet-3247144>

<https://www.monitor.co.ug/uganda/special-reports/lives-we-lost-killed-on-fifth-day-of-his-new-job-3247940>

<https://www.monitor.co.ug/uganda/special-reports/dreams-cut-short-by-bullets-3250006>

<https://www.monitor.co.ug/uganda/special-reports/many-protest-victims-were-below-30-years-says-survey-3246742>

<https://www.monitor.co.ug/uganda/special-reports/how-riots-ended-many-lives-3249970>

<https://www.monitor.co.ug/uganda/special-reports/lives-we-lost-herdsman-shot-during-riots-3251104>

<https://www.monitor.co.ug/uganda/special-reports/lives-we-lost-she-died-protecting-her-merchandise-3248990>

<https://www.monitor.co.ug/uganda/special-reports/lives-we-lost-father-of-nine-died-after-bullet-tore-his-stomach-3251118>

<https://www.monitor.co.ug/uganda/special-reports/lives-we-lost-shot-in-the-back-on-his-motorbike-3251018>

<https://www.monitor.co.ug/uganda/special-reports/lives-we-lost-25-year-old-loses-life-after-prayers-3251120>

<https://www.monitor.co.ug/uganda/special-reports/lives-we-lost-ssekyanzi-was-an-inspiration-to-the-youth-back-home-3249012>

<https://www.monitor.co.ug/uganda/special-reports/lives-we-lost-shot-on-way-home-3248930>

<https://www.monitor.co.ug/uganda/special-reports/lives-we-lost-he-was-a-committed-boda-boda-rider--3249020>

<https://www.monitor.co.ug/uganda/news/national/he-was-targeted-for-wearing-a-red-jersey-3251356>

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PART III: IRREGULARITIES IN CONNECTION WITH THE JANUARY 14, 2021 ELECTION

On January 8, 2021, as part of a campaign to intimidate independent news coverage of Uganda's election, Uganda's Police Chief Martin Okoth Ochola warned that journalists who sought to cover election or campaign matters would be beaten: "You are insisting you must go where there is danger. Yes, we shall beat you for your own sake to help you understand that you do not go there. Yes, we shall use reasonable force to ensure that you don't go where there is a risk. Actually, I have no apology," he said. His comments were reported by Reuters. <https://www.reuters.com/article/us-uganda-election/ugandas-police-chief-beating-of-reporters-for-their-own-good-idUSKBN29D17V>.

Beginning January 9, 2021, the Uganda government began a series of arrests, detentions, media shutdowns, imposition of military presence at all towns and cities, closure of the internet, intimidation of political party staff and other acts designed to impede a fair election, including detention of opposition aides and staff and inhibiting campaign communications. These acts were designed to create an atmosphere of fear to discourage voters and to prevent opposition parties and voters from documenting election abuse and fraud. In their totality, these acts destroyed the semblance of a fair and neutral election process.

PRE-ELECTION ARREST OF REMAINING WINE CAMPAIGN STAFF January 9, 2021

On January 7, 2021, police arrested the last remaining members of Bobi Wine's campaign staff still at liberty following the December 20, 2020 arrests on Kalangala Island:

"These 17 remaining staff members had escaped prior capture and were arrested at Kakoli Village in Budaka District, handcuffed and taken to Mbale Central Police Station.

A week ago, police had waylaid and arrested 126 Bobi Wine supporters in the islands of Kalangala District. When they appeared in court after five days of detention, dozens of them appeared to be limping as they hopped out of the prison truck at Masaka Magistrate's Court. They later displayed wounds on various parts of their bodies before the court as they pleaded for mercy, saying they had been tortured."

<https://www.monitor.co.ug/uganda/special-reports/elections/bobi-wine-s-lonely-walk-to-election-day-3251966>.

ASSAULT AND RAID ON KYAGULANYI HOME AND COMPOUND January 12, 2021

On January 12, 2021, Bobi Wine reported that his long-time private security service was ordered by the government to stand down and he remained without protection two days prior to the election. <https://mobile.twitter.com/mmusimaimane/status/1349039011503898625?prefetchtimestamp=1611531394386>. Later this same day, the military raided his home and removed his two remaining guards who were beaten and

arrested. <https://metrowatchonline.com/ugandan-army-raids-home-of-musevenis-main-challenger-bobi-wine-2-days-to-election/>.

The raid on January 12, 2021 is significant as this date was designated by the Uganda Electoral Commission as the final day for campaigning prior to the election on January 14, 2021.

According to reports and statements given by Mr. Kyagulani, the Ugandan military assaulted and severely beat his personal bodyguard; two gardeners on the premises were arrested and kidnapped during the raid; to date their status and whereabouts are unknown. <https://www.voanews.com/africa/ugandas-bobi-wine-reports-police-raid-home-two-days-presidential-election>.

These actions were a prelude to the house arrest and encirclement of his home by the military that went into effect after Kyagulanyi and his wife Barbara returned to their home after voting on January 14, 2021.

ARREST OF NUP PARTY OFFICIALS IMMEDIATELY PRIOR TO ELECTION DAY January 12, 2021

Also on January 12, 2021, a NUP party official, Herman Ainebyona, was arrested and removed to an unknown location. A clandestine video depicts his abduction and arrest and the accompanying physical abuse. <https://m.facebook.com/100009330734014/posts/2847455412242122/?d=n>. Mr. Ainebyona was the NUP Diaspora Coordinator who was tasked with organizing support for the Wine campaign and the NUP candidates from Ugandans abroad; he had arrived in Uganda only 24 hours before his arrest.

On January 12, 2021, NUP official Luke David Bwanika was arrested during a raid at his home in Magere. He was a close associate of Bobi Wine in the music industry and in the NUP and has not been heard from for more than two weeks. A report of his disappearance can be found at Opera News, a professional website for musicians in Uganda, <https://ke.opera.news/tags/lule-david-bwanika>, and in The InformerUG; <https://theinformerug.com/bobi-wine-pens-down-an-emotional-letter-to-his-muko-selector-davie/>.

GOVERNMENT SHUTDOWN OF ALL SOCIAL MEDIA PLATFORMS January 12, 2021

On January 12, 2021, all social media applications were ordered closed by the Uganda Communications Commission, as noted by the Hon. Clement Voule, UN Special Rapporteur on Freedom of Association and Peaceful Assembly, who stated:

“I am receiving worrying allegations of internet shutdown & blocking of access to social media platforms ahead of tomorrow's general elections in #Uganda. Access to information & communication tools is critical for fair, transparent & peaceful elections @DefendDefenders @accessnow”. <https://twitter.com/cvoule/status/1349308270058614784>

Rapporteur Voule's statement followed the Uganda Communications Commission order of January 12, 2021 directing all social media providers to close all internet service and, in particular, that they must

“immediately suspend any access and use, direct or otherwise, of **ALL** social media platforms and online messaging applications...until further notice.”

See Letter, January 12, 2021, Uganda Communications Commission (UCC), reproduced below [emphasis in original]. Notably, no administrative findings were made to support the UCC order. No statement of reasons accompanied the order.⁶ A copy of the UCC letter closing all social media platforms is reproduced below:



**UGANDA
COMMUNICATIONS
COMMISSION**

UCC House
Plot 42-44 Spring Road
Bugolobi
P.O. Box 7376
Kampala, Uganda

Our Ref.: C

12th January 2021

Dear Sir,

SUSPENSION OF THE OPERATION OF SOCIAL MEDIA

In exercise of its functions under section 5(1) of the Uganda Communications Act of 2013, Uganda Communications Commission hereby directs you to immediately suspend any access and use, direct or otherwise, of **ALL** social media platforms and online messaging applications over your network until further notice.

Thank you for your cooperation

Yours faithfully


Irene Kaggwa Sewankambo
AG. EXECUTIVE DIRECTOR

⁶ As of January 18, 2021 internet was partly restored but social media remained blocked. <https://www.bbc.com/news/world-africa-55705404>.

**UGANDAN GOVERNMENT DENIAL OF AMERICAN, INTERNATIONAL AND
DOMESTIC ELECTION OBSERVERS
January 13, 2021**

Compromising the election even further, the Ugandan Electoral Commission refused to accept American elections observers, denying all but 15 permits without reason or explanation. On January 13, 2021, the United States cancelled its election observers after the Government of Uganda and the Electoral Commission had denied the accreditation of nearly all U.S., international and nongovernmental observers.

U.S. Ambassador to Uganda, Natalie E. Brown, issued the following statement on the cancellation of the U.S. observer mission:

“It is with profound disappointment that I announce U.S. Mission in Uganda’s decision to cancel our diplomatic observation of Uganda’s January 14 elections due to the decision by the Electoral Commission of Uganda to deny more than 75 percent of the U.S. election observer accreditations requested. With only 15 accreditations approved, it is not possible for the United States to meaningfully observe the conduct of Uganda’s elections at polling sites across the country.

Despite multiple requests, the Electoral Commission provided no explanation for its decision, which it communicated mere days before the elections. The purpose of a diplomatic observation of elections is to demonstrate our interest in a free, fair, peaceful, and inclusive electoral process. Diplomatic observers are not participants or advisors in the electoral process. Rather, they informally observe the conduct of elections, following strict standards of impartiality, non-interference, and compliance with local laws. The Government of Uganda has supported such U.S. observer efforts in multiple previous Ugandan elections. This makes the decision now to deny accreditation to all but a small, randomly selected handful of our observers all the more troubling.

As we have stated previously, the United States takes no side in Uganda’s upcoming elections. We support a free, fair, peaceful, and inclusive electoral process. For Uganda’s 2016 elections, the U.S. Mission dispatched 88 diplomatic election observers. For the January 14 election, the U.S. Mission complied with all Electoral Commission accreditation requirements, as we had in previous elections in Uganda, but the vast majority of our requests for 2021 were not approved.”
<https://ug.usembassy.gov/statement-by-u-s-ambassador-natalie-e-brown-on-cancellation-of-u-s-diplomatic-observer-mission-of-ugandas-elections/>.

Of the 1,900 NGO and Ugandan applications for elections observers, only ten (10) were granted according to Reuters. Considering that Uganda has 34,344 polling stations,⁷ the government’s grant of ten permits was a palpable effort to avoid independent observers and allowed full scope for election abuses. In addition, the European Union and the United Nations have issued statements condemning the use of violence and the infringement on basic freedom leading up to the election and the veracity of the election results as a result of categorical denial of non-partisan observers. <https://www.reuters.com/>

⁷ As reported by the Uganda Electoral Commission; <https://www.ec.or.ug/electoral-commission-statistics>.

[article/us-uganda-election/u-s-cancels-its-observation-of-ugandas-presidential-election-idUSKBN29I1C0](https://www.reuters.com/article/us-uganda-election/u-s-cancels-its-observation-of-ugandas-presidential-election-idUSKBN29I1C0). As is well-known, the EU cancelled its observer mission this year because the Uganda government had failed to implement reforms the EU observers had recommended after the 2016 election. <https://www.reuters.com/article/uk-uganda-politics-idUKKBN27W1H5>

GOVERNMENT-ORDERED NATIONWIDE INTERNET SHUTDOWN

January 14, 2021

The ban on social media platforms was immediately followed on Election Day, January 14, 2021, by a complete shutdown of the entire Internet in Uganda, an order that paralyzed all communication in the country and was not lifted until Monday, January 18, 2021 when sporadic service was restored. The Internet shutdown was widely reported internationally. See e.g. <https://www.reuters.com/article/uganda-internet-rights/corrected-100-hours-in-the-dark-how-an-election-internet-blackout-hit-poor-ugandans-idUSL4N2JU2YQ>. The intent of the Internet shutdown, as well as the military presence in all towns and cities and the arrest and detention of opposition staff and aides, was to prevent opposition figures from reporting elections law violations and to interfere with evidence gathering as to election fraud. At this same time NUP staff were rounded up and arrested, further interfering with the gathering of evidence for a judicial challenge.

1200 POLLING STATIONS NOT COUNTED BY ELECTORAL COMMISSION IN AREAS OF STRONG SUPPORT FOR BOBI WINE

When confronted by the Daily Monitor, the Electoral Commission acknowledged that votes from more than 1200 polling stations were not counted. These were from urban areas such as Kampala where Bobi Wine polled more than 75% of the vote in those districts that were counted. The Electoral Commission claimed that the uncounted districts would not change the result and that it was seeking to declare a winner within 48 hours. It is not clear how many other polling stations were left out of the count; the Commission conceded the uncounted districts only when confronted by the Daily Monitor. The districts most affected by the undercount were Kampala and Wakeso with the first and second highest number of registered voters in the country. The newspaper reported that only districts where Bobi Wine was ahead were excluded from the vote count. <https://www.monitor.co.ug/uganda/special-reports/ec-excludes-results-from-over-1-200-polling-stations-3260542>.

“NATIONAL ELECTION WATCH UGANDA” BANNED PRIOR TO ELECTION

A consortium of 61 poll watching groups, National Election Watch Uganda, was banned from operating in Uganda beginning in October 2020 and continuing through the January 14, 2021 election. As noted above, almost the entire U.S. observer mission was denied admission to Uganda forcing the U.S. embassy to cancel the program. Patrick Onen Ezaga, the senior communications officer of Uganda’s NGO Bureau claimed the operations of National Election Watch Uganda were illegal because it is not registered in the country; no other reason was given. <https://www.independent.co.ug/ngo-bureau-suspends-operations-of-national-election-watch-uganda/>. As a result of these combined actions by the Ugandan government, there were no independent poll watchers for more than 34,000 polling stations in this heavily contested and controversial election.

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VIDEOS REPRESENTATIVE OF BALLOT AND ELECTION FRAUD SUPPLIED BY UGANDA CITIZENS/VOTERS

Despite the severe disabilities imposed by the internet and social media shutdown, as well as the banning of phones and cameras at polling stations and other acts of coercion, a limited number of videos (some produced by dissenting police and military officers) have emerged from Uganda demonstrating voting fraud, the illegal pre-marking of ballots, ballot box stuffing, multiple voting by single voters and related irregularities.

Among other violations, the videos show that polling places were typically non-private with voters are surrounded by elections officials, in many cases soldiers, who direct how they should vote. It is partly for this reason — i.e., the coercion at the point of voting — that the returns in much of Uganda show virtually unanimous (100%, 99% or 98%) vote for Museveni. It is undoubtedly for these same reasons, that the Uganda Electoral Commission rejected virtually all permits for domestic and international observers.

In the first video, voters come to a table and are given a ballot. They are asked to dip their finger in ink and officials then point to a place on the ballot where they are to mark their vote. In this video, the officials plainly point to the bottom of the ballot where General Museveni's name appears as the last candidate. The video can be accessed at: <https://www.facebook.com/www.bobiwine.ug/posts/10160595683603012>.

In this next video, the privacy bin — an open plastic bin used to allow the voter to mark their ballot — is also in direct view of elections officials. Soldiers actually watch the voter mark his ballot. This is a typical practice in much of Uganda and violates norms for fair and neutral elections. Here, a gentleman bends over the bin in full view of a soldier who examines the marked ballot before it is turned into a ballot box. The voter's choice of candidate is clearly visible to the soldier who actually picks up and inspects the ballot. https://m.facebook.com/story.php?story_fbid=443882076767451&id=130737598011.

A video sent to the NUP by a member of the Uganda Police Defense Forces (UPDF) depicts the pre-marking of ballots by police. The video depicts a stack of pre-printed presidential ballots bound together, all checked for Museveni, whose name appears as the last in the column to facilitate rapid pre-checking. Bobi Wine has tweeted that the informant has said he and others were directed to pre-mark the ballots by their commanding officers. The video link can be accessed at: <https://www.facebook.com/www.bobiwine.ug/posts/10160598781843012>.⁸

Next we see an example of military domination of the polling places. In this video four soldiers physically drag a man, against his will, from a polling place while he protests that he is an "elections agent". In this instance, the man was an agent for Mr. Wine's party,

⁸ Readers are advised that where the video link is sent via Mr. Wine's campaign Facebook account, a request to join the public page appears; please click "Not Now" and the screen will return immediately to the video that will play upon a mouse click. It has not been possible to redact the campaign reference.

NUP, who was to be present to observe and report irregularities. This practice took place through Uganda and, as a result, virtually no independent officials (not employed by the government) were present at polling places. The video can be accessed at: <https://youtu.be/mZGHJaFRqzY>.

In the next video exhibit, a police officer is depicted at a polling station in Ksoro, Western Uganda, stuffing ballots into a ballot box. An official stands next to her, supervising. Visible under her left arm is a black bag from which she is withdrawing ballots to force into the opening of the ballot box. The officer is shown having difficulty forcing the ballots into the box that is already stuffed. The video can be accessed here: <https://www.facebook.com/222499281227781/videos/418312356146125/>.

Elections officials in this video are shown pre-marking ballots. A woman and man (in purple toned shirt) then bring the ballots to the ballot box station where, despite protest by bystanders, the man opens the box and throws in multiple pre-marked ballots. It appears that several dozen marked ballots were thrown in together. The video not only demonstrates pervasive, illegal marking of ballots but also shows that there is no elections security in Uganda as the man is free to simply go to the ballot box, open it and throw in dozens of votes. <https://www.facebook.com/jbmuwonge/videos/other-tactics-m7-used-to-rig-the-votes-this-wasnt-an-election-no-way-rigging-rig/869193073649446/>.

In Kazo District, a video depicts a woman being presented by election officials with multiple ballots and she then proceeds towards the ballot box to the right of the screen. It appears that she was given upwards of ten or 12 individual ballots that were then combined together. She is sent by an election official towards the ballot box. <https://youtu.be/2Exd-zFrU90>.

Such practices appear to be common throughout the Uganda elections system. For example, in Isingiro, where Museveni is reported to have a 100% vote, a clandestine video depicts a voting station. At approximately 15 seconds into the video a man emerges from a building with multiple ballots that he proceeds to insert in one group into the ballot box. No effort is made to hide the distribution of multiple ballots. The video can be accessed at: <https://twitter.com/KalyowaRashid/status/1351219390344257539>.

The following video depicts elections staff under supervision of an armed soldier pre-ticking dozens of ballots. A man is situated on the ground with stacks of printed ballots and is rapidly checking off ballot after ballot. A second man, standing, is folding each ballot as if it were folded by the voter. He then hands the folded ballots to a third man seated to the left. A man with a grey suit jacket and black slacks holding a folder enters the video from the right, replenishes the ballots and directs the seated man where to mark the ballots. In this frame, there appear to be approximately 200 printed ballots on the ground and held by the various individuals. An armed soldier patrols in the foreground. The video can be accessed at <https://youtu.be/-UZdqF5pp3Q>.

Pre-marking of ballots was common throughout Uganda. In this video at a polling station in Bulambuli, the head city of Bulambuli District, a man in a bright yellow shirt, the colors of the Museveni campaign, is seen marking ballot after ballot for General Museveni. The man is seen repeatedly checking off the last place on the ballot sheet, the place for Museveni. The Uganda ballot is plainly visible. Notably, he is accompanied by at least six other people supplying him with new blank ballots to mark. All of this activity takes place in the open on top of the ballot boxes that are apparently unprotected and unsecured by any election official. <https://youtu.be/TggSh1kUvTo>.

At a ballot location reported as Teyabbye, Uganda by BMTV Africa, a video clandestinely taken through the grill of the polling station, depicts a poll worker (wearing the yellow shoulder vest worn by Uganda poll workers) seated in the center of the frame. She is rapidly pre-marking ballots. As the video advances she marks dozens of ballots and when finished with one group, places it down, picks up another ballot bundle and begins marking again. <https://www.facebook.com/bmtvafrica/videos/747572676171101/>.

As these videos show, this was a pervasive practice. If an average of 100 ballots were illegally pre-marked at each of the 34,440 polling stations, as is seen in these videos, then a minimum of 3.4 million ballots would be illegally cast for Museveni, far more than his margin of victory over Kyagulanyi. This practice of pre-marking, as documented, in itself is sufficient to require a new election with international observers.

In Kiruhura District, a video documents a man (in red jacket) seen marking ballots in a bundle at he stands next to a polling station. He is seen rapidly checking off ballot after ballot in the presence of at least six other individuals who appear to be operating the election station. At the speed at which he is marking ballots, hundreds could be pre-marked in a short time. The video can be accessed at: <https://youtu.be/Ghbr0waqRrE>.

In the following video released by the NUP Media Live TV, dozens of marked ballots remain discarded at a polling station. As the video focuses in the ballot is plainly marked with a check next to candidate Robert Kyagulanyi (Bobi Wine). Dozens of discarded ballots from this polling station are shown abandoned and not included in the sealed ballot boxes. The video, with the NUP Media logo, can be accessed at: <https://www.facebook.com/nuplivemediatv/videos/761956504424667/>. It is a universal irregularity for ballots to be discarded and not included in the sealed box or accounted for as unused ballots.

Incidents of stolen and pre-marked ballots abound. For example, the Daily Monitor reported on 15 Jan 2021 that ballots were re-marked at Rushenyi in Ntungamo District and Kashari in Mbarara District. In this report, witnesses state that blank ballots were stolen and voters were given pre-ticked ballots and told to vote for General Museveni:

“In Rushenyi County in Ntungamo District, a box containing ballot papers was stolen in transit to a polling station while in Kashari County in Mbarara District voters were reportedly given pre-ticked ballots for president at a polling station,

sparkling protests. The stolen box contained voting materials for Kacerere Polling Station in Nyarwanya Parish in Rushenya constituency.”

“In Mbarara, at Amabaare Central Church of Uganda Polling Station in Nyabisirira parish in Kashare Sub-county in Kashari Constituency, some local council officials who were serving as candidate Yoweri Museveni’s agents reportedly announced that voters would be given pre-ticked ballots for president [...] The commanding officer, a tall man dressed in Khaki uniform, reportedly asked people who were lining up that whoever was not willing to vote President Museveni should get out of the queue. The voter further alleged that the police officer ordered pre-ticking of all ballot papers for president and stayed at the presiding officer’s desk as pre-ticked ballots in favour of candidate Museveni were being issued to voters.”

“At another polling station called Mutoozo in the neighbouring parish voters were reportedly not given ballots for president and the ballot box for president was not there. They were reportedly given only ballots for Members of Parliament.”

See <https://www.monitor.co.ug/uganda/special-reports/elections/ballot-box-stolen-voters-protest--3257914>.

In some districts voters reported that their votes had *already* been cast before they even arrived at the polling stations. For example, in Isingiro District a voter told *The Observer* that when she went to her polling station at Busingye pentecostal church at around 11 am, she was told she'd already voted yet she still had in her possession her voter location slip and National IDs, the two main documents that used for voter verification: "I thought I was the only one until when a boda boda [taxi-cyclist] rider also told me the same had happened to him at a nearby polling station. Later in the evening, we discovered that many people in the area had already been voted for," Nyakato said. https://observer.ug/news/headlines/68280-statistical-impossibilities-museveni-scored-100-at-348-polling-stations?fbclid=IwAR33DiHLOESvhnwR9KfYKtfEoiGujsEvkR1p8WDhZkvl_wBtJBqqVdopoRc.

Audio Reports Documenting Irregularities

Incident reports have been made by audio documenting pre-marking of ballots and other indicia of election irregularities.

AUDIO testimony by Gomba Supervisor on election fraud

BWINE-AA-00013; <https://youtu.be/3BPwPiilG84>.

Summary of translation:

At some polling stations in Gomba, UPDF army came and chased away all election agents and placed the results they wanted already in the morning. Kilasi Maddy Subcounty, Kyayi, Kisoga. In other polling stations, a person called Wamala Kisakyamukama came with soldiers escorting him. They grabbed all the voting material, then threatened the NUP

supporters around by telling them they would shoot. Kisakyamukama was a civilian that came with guns and threatened voters away.

At [] the soldiers came and took the ballot papers and threw it in the church toilet. On 13th January, on the eve of election day, the whole district of Gomba was surrounded by UPDF army and they were arresting and threatening NUP supervisors. NUP supervisors were not able to sleep in their houses.

Transcript of rough translation:

1.13 I was the supervisor for the whole district of Gomba

1.39 Night before election there were cars without number plates with soldiers arresting the suspected NUP agents or supporters. Most NUP supporters slept in the bush. The NUP agents who survived this operation because they were tipped off, resorted to hiding and could not return to their homes.

1.50 There were many soldiers across the night and they would take the NUP agents. On the polling day in Gomba Western Region we (the agents) were kept away arrested and beaten.

2.47 [then the example of Kilasi] some were beaten, others sent away.

3.05 For example in Buyanja. The police and army were shooting bullets at PS. In the middle of the day, there's a gentleman called Wamala Kisakyamukama who came with guns, he's a civilian, so he came when supporters of NUP are around to keep the vote safe. He threatened to shoot and people ran away and then he took the voting material. He took the material to an unknown place.

4;31. This was the situation in Gomba, it was not a free election. There was a lot of beating and arresting. At night at 3 am the soldiers came, took ballots, and poured them into the church toilet.

5:44 I don't know how they got the ballot papers. They have a recording of a polling assistant. A gentleman called Mugyenyi came with soldiers and took the ballot papers and they put them in the church toilet.

- It is recorded?

Yes, we were getting evidence from all these places - generally it was intimidation & threats.

At certain Polling Station people were chased away and kept from voting. They came in with the vote, just NRM. In such a station NUP got 0.0. All NUP candidates got 0, and NRM got all the votes.

At certain places the number of votes are higher than the number of registered voters. Example: 300 registered voters, but NRM got 750.

9.40 - This is Gomba district

AUDIO testimony in a local dialect of woman who witnessed pre-ticked ballot papers

BWINE-AA-00012; <https://youtu.be/VCeWtCL0mD0>

English Summary:

The woman says that she witnessed pre ticked presidential ballots being shoved into the boxes. She tried to make inquiries about the pre ticked ballots but was threatened by the military officers/police at the polling site. She objected to the announced results by election officials but was threatened and reminded that Mr. Kyagulanyi (Bobi Wine) is a Muganda. [NOTE: This video is in Runyankole, so it is traceable to Western Uganda, a place that General Museveni claims to have won.]

AUDIO testimony by Gomba Woman MP on election fraud

BWINE-AA-00014; <https://youtu.be/UGGVPtHwUpk>.

Transcript:

There was violence, we registered a lot of ... that happened during the election process until they declared the so called winner.

People woke up very early to vote, especially in Gomba west. At 5am it was registered that there were already slips that were pre-ticked, by the time people started voting. When the agents started to occupy the place, they realized the slips were there.

During the day, a man called Wamala Kisakyamukama went from one place to another chasing away observers and agents, especially from NUP. He pointed guns who tried to observe.

No-one could stop him. I asked the consulting officer. I asked what role Wamala was taking in the electoral process. They beat people, they chased people, they teared DOR forms, or appointment letters. Only of the opposition, to get new DOR forms so they can refill it with whatever they want.

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District Votes Reflecting Nearly 100% Vote for Museveni

In multiple voting districts, direct evidence of falsified voting returns has been documented by the Electoral Commission's "Results Tally Sheet" for each Uganda District. In a significant number of cases the Tally sheets for entire districts reflect a virtually unanimous vote, ranging from 95% to 100% in many cases. Whole districts reflect a 100% return for Museveni while many others reflect an equally improbable 98-99% return for Museveni. Such pattern is pervasive among up to approximately 20% of the polling stations. Such voting pattern is reflective of direct manipulation and falsification of the vote count by the Electoral Commission or coercion of voters at the polling place. This pattern is reflective of the old Soviet style voting returns that generally showed 97.8% or similar such figures vote for the ruling Communist Party candidates.

The existence of any such pattern undermines the validity and credibility of the vote and calls into question the validity of the remainder of the Electoral Commission's tally for Museveni in which he is generally reported in most districts to have overwhelmingly large majorities.

Amudat District No. 081:

In this district consisting of 44 Parishes with dozens of voting districts, the Results Tally Sheets reflect that out of 118 parishes in Amudat District all but 13 reported votes for Museveni in the amount of between 96% and 100% with most reporting between 98% and 99% and many stations reporting a 100% vote for Museveni. The only exception to this pattern are 13 parishes that reported 95% or less. Thus, the Tally for Amudat district reflects a virtually universal pattern of voting fraud.

Bukwo District No. 059:

In this district virtually all recorded votes are above 85% for Museveni, in itself suspect. In three sub counties in Bukwo District there is clear fraud in which the voting pattern is universally above 95% and in many voting stations is 100%. These subcounties include: Mutashet, Lwongon and Brim.

Isingiro District No. 062:

In this district nearly half of the reported stations in dozens of parishes and counties describe Museveni as receiving 100% of the vote. Specifically, in Isingiro District the Electoral Commission reported that Museveni received 100% of the vote in 87 voting stations and between 96% and 99% in an equal number of stations. In total, in Isingiro at least 65 parishes reported a vote for Museveni of between 95% and 100%, while 66 parishes reported votes between 89% and 94%.

Kamwenge District No. 046:

In this district more than half of the 61 parishes show vote totals reflecting a manipulated pattern in many polling stations. In two stations the percent for Museveni was 100%, in one station 99%, at 7 stations 98%, at five stations 97%, at five stations 96%, at three stations 95%, at four stations 94% and at four stations 93%, for a total of 31 stations above the 93rd percentile; in most cases the reported vote is virtually unanimous vote for Museveni. This voting pattern in Kamwenge District reflecting multiple instances of alleged votes between 95%-100% is indicative of manipulated and fraudulent voting practices.

Karenga District No. 130:

In this district, 13 out of 35 parishes report vote totals for Museveni at a level of 95% and higher, including: one parish with 99% of the vote; two parishes with 98%, five parishes with 97%, four parishes with 96% of the vote for Museveni and one parish at 95%. Four additional parishes were between 91 and 93 percent voting for Museveni. Approximately two dozen individual voting stations in Karenga reported vote totals at between 96% and 100% of the vote for Museveni. This pattern reflects the synthetic and engineered voting seen in other districts.

Kazo District No. 131:

This entire district was engineered to return virtually every vote for Museveni. Museveni received 98.04% (73,043 votes) while Kyagulanyi received 1.18% (879 votes). The vote was plainly engineered as literally dozens of voting stations reported 100% of the vote for Museveni. Specifically, at least 111 voting stations reported 100% vote return for Museveni, while nearly every polling station reported vote totals of between 96% and 100% for Museveni.

The falsification of the vote was so complete that 15 parishes reported 100% of their vote for Museveni, nine reported 99%, seven reported 98%, five reported 97%, six reported 96% for Museveni and two reported 95% vote for Museveni. A total of 42 parishes out of 50 reported vote totals of at least 95% for Museveni. Only eight parishes reported votes below 95% for Museveni and the lowest of these was 87%. District Kazo is a falsified and engineered voting return.

Kiruhura District No. 065:

As with Kazo District, District Kiruhura was engineered to return its entire vote for Museveni. Museveni received 75,483 (98.76%) while Kyagulanyi received 616 votes (1%).

Virtually every polling station in Kiruhura District was listed as returning votes of 100% or 99% for Museveni, resulting in virtually all votes being awarded to the ruling incumbent.

Out of approximately 189 polling stations in this District, 143 reported 100% of their votes for Museveni, a plainly manipulated report.

Out of 56 parishes, 45 reported 100% or 99% of the vote for Museveni.

Kiruhura District was fraudulently manipulated to return virtually all votes for Museveni. No pattern of voting can explain the reported return.

Kyankwanzi District No. 093:

In this district, multiple parishes show returns of 100% (or near to it) for Museveni. These parishes all reflect returns of between 96% and 100% for Museveni. See Tally Sheet, Kyankwanzi at pp. 14-15.

Mbarara District No. 027:

This district contains several polling reports for stations at 100% for Museveni and multiple stations reporting 98%-99%.

Nabilatuk District No. 128:

In this district virtually all polling stations, almost without exception, reported vote counts of between 98% and 100% for Museveni. In this district 17 out of 24 parishes reported vote totals of at least 97% and ranging to 100% for Museveni.

Museveni is reported to have received 16,038 votes (97.82%) while Kyagulanyi is reported by the Commission to have received 272 votes (1.66%). This pattern is again a demonstration of an engineered vote in which nearly 100% of the District's vote has been directed to Museveni.

Nakapiripirit District No. 056:

Virtually all votes in this district were reported by the Electoral Commission for Museveni who was awarded 22,029 (94.36%) to 978 (4.19%) for Kyagulanyi. Nearly every polling station in the district reported results of between 97% and 99% for Museveni.

Nakaseke District No. 069:

A continuing pattern of fraud is exhibited in this district where 43 polling stations were reported to have cast either 100% or 99% of their vote for Museveni. In addition, dozens of polling stations within this district cast votes of 96% to 98% for Museveni reflecting the same pattern of fraudulent voting. This resulted in Museveni being awarded 38,009 (53.51%) compared to Kyagulanyio's reported vote of 32,063 (45.14%) but because of the evident manipulation in the vote, it is clear that the majority favored Kyagulanyi, a pattern that almost certainly replicates in districts throughout Uganda.

Napak District No. 107:

In Napak District the Electoral Commission reported vote totals of between 95% and 99% for approximately two-thirds of the polling stations, again reflecting either pre-marking ballots or coercion at the polling place. As a result, Kyagulanyi received virtually no votes: Museveni was awarded 32,490 (94.06%) while Kyagulanyi was awarded only 912 votes (2.64%). Virtually every polling station awarded nearly all of its votes to Museveni, a impossible voting pattern explainable only by manipulation or fraud.

Ntungamo District No. 34:

Dozens of polling stations in this district also reflect an unrealistic and unattainable 95%-100% of the vote awarded to Museveni, with some stations showing slightly lower returns. This includes multiple districts with 100% or 99% of the vote given to Museveni.

In Ntungamo, Museveni is listed as taking a vote of 161,655 to Kyagulanyi's vote of 12,503, a massive differential that is explainable only by voting manipulation.

The above districts demonstrate a consistent pattern of fraud and manipulation that resulted in nearly 100% of the vote being directed to a single candidate, General Museveni. The vote distribution in such magnitude is explainable only by alteration of vote totals or coercions of voters. Other districts, including but not limited to, Buhweju, Kakumiro, Moyo Sheema, Rukiga, Kisoro, Kotido, Rubirizi, Kween, Ntungamo, Rwampara, Kakumiro, Kamwenge, Bukwo, Budibigyo, have high vote counts for Museveni that can have just as easily have been manipulated in the same manner as the districts discussed above.

Similarly, the pervasive pre-marking of ballots and other coercive measures, see Part III, along with repression of political parties and campaigns, the use of violence to discourage voter turnout, the control of polling places by the military, the government's domination of the Electoral Commission, the arrest of campaign lawyers, the arrest of candidates, the closure of the internet, the ban on campaigning and other factors, see Parts I and II, taint the honesty and integrity of Uganda's election and demonstrate a substantial basis on which the election certification must be regarded as the product of fraud, coercion, manipulation or structural devices designed to alter the vote to retain General Museveni in office beyond his existing tenure of 34 years.

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PART IV: POST-ELECTION ARRESTS OF NUP AND CAMPAIGN PERSONNEL

RAID AND SIEGE OF NUP HEADQUARTERS BY UGANDAN MILITARY UNLAWFUL ARREST OF HUNDREDS OF NUP STAFF January 16 - 18, 2021

Two days after the election, on or about January 16, 2021, the Ugandan Military raided and laid siege to the NUP party headquarters located in Kamwokya District.

NUP offices were raided and surrounded by the Ugandan Military; the offices were then closed, locked and staff members attempting to re-enter were prevented by soldiers.

Over 110 members of Mr. Kyagulanyi's staff were arrested in the days following the January 14th election. <https://www.reuters.com/article/uk-uganda-election/ugandan-opposition-says-troops-raid-its-offices-amid-election-challenge-idUSKBN29N13X>. As of this date, approximately 600 NUP associates have been arrested and others, including the party's General Secretary, have been forced into hiding; at least 2,000 staff members are missing. A list of missing high NUP officials is annexed to this Report.

The purpose of these attacks and arrests has been to disrupt the operation of the NUP and to prevent coordination and gathering of evidence of election irregularities.

MILITARY OCCUPATION OF ROBERT KYAGULANI'S HOME January 15, 2021 - January 26, 2021

On election day, January 14, 2021, Mr. Kyagulanyi's home was overrun and occupied by Ugandan military and security forces. Mr. Kyagulanyi's personal security force was beaten and assaulted, and forced to disperse.

For 11 days, Mr. Kyagulanyi was held in his home with his wife, a single staff-member and an eighteen (!8) month old infant, his niece, surrounded by hundreds of troops, military vehicles and overhead helicopters.

Mr. Kyagulanyi repeatedly attempted to speak with the occupying troops and issued a statement on Twitter that none would say a word to him or his family.

On one occasion Mr. Kyagulanyi's wife attempted to collect food from the garden and was beaten by security forces. The military repeatedly threatened the family at gunpoint. <https://youtu.be/cpu2Rz43sK8>.

Mr. Kyagulanyi's cell phone was shut off by the Ugandan Communications Commission, and he remained a political prisoner with no charges against him through January 26, 2021.

Mr. Kyagulanyi's home had run out of food approximately four days into the eleven day siege and military forces would not allow him to receive food or aid from the outside.

U.S. Ambassador Natalie E. Brown attempted to enter the premises of Mr. Kyagulanyi's home to deliver food and aid and was denied entry by Ugandan forces. <https://www.facebook.com/U.S.EmbassyKampala/posts/3628148443901304>. By this time, Mr. Kyagulanyi and his wife had been captive for five (5) days, and had run out of provisions. Military forces would not permit him and his family to receive food or outside aid of any kind.

The military presence at the Kyagulanyi home ultimately terminated after the Uganda Court ordered his release on January 25, 2021.

The purpose of such encirclement was to prevent Kyagulanyi from communicating with party and campaign staff, from instructing counsel in connection with legal challenges to the election, and from speaking with the Ugandan people following the election. The government offered no explanation as to his detention except the claim that it was seeking to protect him. <https://www.monitor.co.ug/uganda/news/national/oponde-slams-us-envoy-over-attempted-visit-to-bobi-wine-3262292>.

At no time were any charges lodged against him nor was he informed of any violation of law to support the home detention. A report from Sky News demonstrates the encirclement at the compound when his lawyers attempted to reach him through a military gauntlet <https://youtu.be/i44OMLrh8zE>

Amnesty International noted that MP Kyagulanyi and his wife and staff were being held illegally for political purposes. <https://www.amnesty.org/en/latest/news/2021/01/uganda-end-politically-motivated-detention-of-robert-kyagulanyi-and-his-wife/>.

BEATING OF FRANCIS ZAAKE, MP January 18, 2021

On Saturday January 17, 2021 MP Francis Zaake attempted to visit Mr. Kyagunalini's home which was under illegal military occupation and while Mr. Kyagunlani was held without charges by military forces, as described above.

MP Zaake attempted to enter Mr. Kyagulani's home and was viciously beaten by military forces, and was then arrested by the Kampala Metropolitan Police.

NTV Uganda journalist Cliff Wamala was also denied access to Mr. Kyagulani's home and arrested.

MP Zaake was taken to the Kasangati Police Station, where he was released and then admitted into in Rubaga Hospital, Kampala as a result of the severity of his injuries sustained in the beating by Ugandan authorities. <https://www.ntv.co.ug/ug/news/national/mp-zaake-arrested-as-bobi-wine-can-t-leave-his-home-3259318>.

The sole basis for the attack on Mr. Zaake was his political association with Robert Kyagulanyi.

POST-ELECTION ARREST OF MORE THAN 3,000 NUP SUPPORTERS AND KYAGULANYI STAFF VIA UNMARKED VEHICLE

Since the election the government of Uganda has hunted down and arrested at least 3,000 NUP staff and campaign staff. Ugandans report frequent break-ins and arrests by plain clothes agents using unmarked white vehicles, known to the populace as "drones". Hon. Kyagulanyi reports that at least 3,000 staff have disappeared, none have been brought to court, and they are apparently being held at undisclosed locations throughout Uganda. NUP Secretary General David Lewis Rubongoya told Reuters wire service that people had begun to disappear on Nov. 18, the start of two days of protests: "The state started conducting operations across the country, picking people and taking them away," he said. <https://www.reuters.com/article/uk-uganda-election-idUSKBN2A222P>.

Uganda's police have confirmed the practice of using unmarked white Toyotas to arrest individuals and that at least 1,100 people were arrested between Nov. 18-20, 2020. On January 5, 2021 Police spokesperson Fred Enanga confirmed that the police had been using unmarked vehicles with number plates concealed and that the arrests violated arrest and detention standards. <https://www.monitor.co.ug/uganda/news/national/gen-lokech-issues-new-orders-on-arrests--3247658>.

The purpose of such mass arrests is to depopulate the opposition's professional staff and eliminate and neutralize its ability to mount public protest and legal challenge to the January 14, 2021 election certification.

MILITARY COURT APPEARANCE OF KYAGULANYI CAMPAIGN STAFF FEBRUARY 1, 2021

After weeks in detention, Mr. Kyagulanyi learned on February 2, 2021 that his campaign staff, see Addendum to this Report, were brought to a military court for a bail hearing. This violates Uganda law under which defendants are to be brought within 48 hours to a civilian court for bail and other procedural matters. Mr. Kyagulanyi reports that the bail hearing was then deferred for another eight (8) days, keeping his staff in military custody without any civil charge. Photographs by the Daily Monitor annexed to the Tweet show detained persons being carried due to apparent ill health while in military custody. <https://pbs.twimg.com/media/EtJmtRQXUAla3x?format=jpg&name=900x900>. The kidnappings have continued through the date of this Report; on January 30, 2021 an NUP aide, Mukassa Kenneth was kidnapped and taken to an unknown location.

Approximately 3000 NUP staff and aides are missing, have not been produced in civilian courts and have not been heard from, in many cases since mid-November. The purpose of such attacks has been to demoralize and destabilize the opposition, to prevent public protest, to prevent development of a legal strategy to challenge the election results and to prevent Bobi Wine, in particular, from reaching out to the international media and sympathetic foreign governments.

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CONCLUSION

This Report is intended as a representative discussion to demonstrate the fundamental corruption and taint of the election process in Uganda. We believe the facts described in this Report give rise to a substantiated basis on which to set aside the certification of General Museveni as the winner of Uganda's presidential election and the requirement of a new election under which there will be adequate domestic safeguards, along with the barracking of all soldiers, the release of all opposition figures and the presence of observer teams from Uganda NGO's, the United States, the European Union and other interested State observers.

Respectfully submitted,

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Counsel for Robert Kyagulanyi, M.P.
National Unity Party

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ADDENDUM TO REPORT

LIST OF DETAINED NUP MEMBERS:

List of 133 NUP Members or Supporters detained in the run up to the 2021 Ugandan Elections.⁹

Members of Hon. Kyagulanyi's Campaign Team arrested in Kalangala District on 30th December 2020.

1. Ali Buken, aka Nubian Li (Bobi Wine's singing partner and close aide)
2. Daniel Oyerwot (Bobi Wine's music producer and close aide)
3. Edward Ssebuufu, aka Eddie Mutwe (Bobi Wine's personal bodyguard)
4. Hadija Nalubega
5. Joy Namuyimba
6. James Mubiru
7. Monica Tushemereirwe
8. Oliver Lutaya
9. Maureen Nabukeera
10. Maria Tracy Nakimuli
11. Tasha Nakalema
12. Charles Mpangi
13. Patrick Nsereko
14. Moshin Kakande
15. John Bosco Sande
16. John Lukyamuzi
17. Regan Lule
18. Ivan Kigundu
19. William Muteeba
20. Faisal Kigongo
21. Musa Mulimira
22. Bashir Mulisa
23. Abubaker Nsubuga
24. Nelson Dyasiima
25. Sam Mutumba
26. Richard Kalema
27. Julius Mwanje
28. Muzafalu Mwanga
29. Ismail Kaddu Nyanzi
30. Stanley Kafuko
31. Achileo Kivumbi
32. Geoffrey Onzima
33. Anthony Agaba
34. Robert Kivumbi
35. Bonny Obicho
36. Samson Ssebiranda
37. Shakira Namboozo
38. Sulait Bukenya
39. Deo Mugambe
40. Lawrence Sserwanja
41. Henry Martin Ssekiswa
42. Richard Ntambi
43. Vincent Kiggo

⁹ This addendum does not include the up to 600 NUP staff that have been detained since the election and whose location and condition are unknown.

44. Geoffrey Ssempijja
45. Abudallah Kawuki
46. Ismail Mugaga
47. Ivan Mubiru
48. Samuel Matovu
49. Ibrahim Tamale
50. Kazore Elijah Bikubi
51. Mutwalibi Ssempijja
52. Hussein Mukisa
53. Brian Semanda
54. Hassan Katumba
55. Sharif Najja
56. Sam Okanya
57. Ibrahim Kizza
58. Enos Tuhame
59. Sam Ssenyimba
60. John Kabengwa
61. Charles Mumbere Mariro
62. Peter Sentuma
63. Peter Kiwanuka
64. Robert Katumba
65. Enock Muwanguzi
66. Fred Mukose
67. Hajalah Kalidi Nakyinda
68. Racheal Akiiki
69. Saphina Nansove
70. Jamila Kalyango Mwanje
71. Rihanah Kemigisha
72. Shamira Nabukalu
73. Lamech / Lameka Ssentamu
74. Swaliki Zafa Ssegirinya
75. Paddy Kalungi
76. Chris Zzali
77. Kennedy Kyalimpa
78. Robinson Ntambi Mudde
79. Lukman Kampala Mwijukye
80. Hassan Kasaga
81. Muhammad Nsubuga
82. William Nsubuga
83. Adam Matovu
84. Muhamad Mugerwa
85. Patrick Muwanula
86. Henry Sseunkuma
87. Abdallah Katumba
88. Hajjara Karid
89. Tusiime Rachael Akiki
90. Kalyango Jamirah Namwanje
91. Dema Kemigisha
92. Hassan Ssemakula
93. Ivan Bukenya
94. Johnson Katende
95. Dorothy Nalumansi
96. Katende Maddi
97. John Miiro
98. Nabiru Mukiibi
99. Fahad Tamale
100. Yesu Kya Kyuma Ntege
101. Geoffrey Mugalya

102.Bossa Musa
103.Juliet Nakayiza
104.Sasha Musagala
105.Kalyango Baker
106.Joyce Namuyimbwa
107.Abdul Muhammad Kawooya
108.Fatuma Namubiru

NUP Polling Day Volunteers arrested in advanced of Election Day

109.Ashraf Lukwago
110.Lawrence Kiryow
111.Martin Ntambi
112.Said Yeka
113.DK Ratib I'did
114.Juma Tella
115.Nyolima Jurugo
116.Innocent Nyanda
117.Ainebyona Herman

List of Further NUP detainees recorded on Uganda Court Production Warrant, 21 Jan 2021

118.Yasin Waswa Kawooya
119.Ronny Ssekabira
120.Hakim Nsubuga
121.Vicent Mayombwe
122.Nuru Abudu Kabuya
123.Gadafi Mugumia
124.Fred Munyakwa
125.Paul Kafeero
126.Ramthan Kabenge
127.Muhammed Kyazze
128.Steven Sserunjogi
129.Kakulu Muwonge
130.Sharon Mutesi
131.Derrick Okello
132.Alex Kayiwa
133.Martin Magembe

[and James Mubiru - already named in list from arrests on 30th Dec 2020]