

THE REPUBLIC OF UGANDA
IN THE HIGH COURT OF UGANDA AT KAMPALA
(CIVIL DIVISION)

MISCELLANEOUS CAUSE NO. _____ OF 2022

- 1. **INITIATIVE FOR SOCIAL AND ECONOMIC RIGHTS (ISER) LTD** :.....: **APPLICANTS**
 - 2. **THE UNWANTED WITNESS (U) LIMITED**
 - 3. **HEALTH EQUITY AND POLICY INITIATIVE LIMITED**
- VERSUS**
- 1. **THE ATTORNEY GENERAL**
 - 2. **NATIONAL IDENTIFICATION REGISTRATION AUTHORITY (NIRA)** :.....: **RESPONDENTS**

AFFIDAVIT IN SUPPORT

I KIIRA BRIAN ALEX, of c/o ALP Advocates, Lotis Towers, 5th Floor, Plot 16 Mackinnon Road, P.O. Box 28611 Kampala, do solemnly swear or (affirm) as hereunder;

- 1. THAT I am a male adult Ugandan of sound mind, the Program Officer, Business and Human Rights, Initiative for Social and Economic Rights (hereinafter referred to as 'ISER'), the 1st Applicant herein, and I affirm this affidavit in that capacity.
- 2. THAT the 1st Applicant is a local independent, not-for-profit human rights Non-Governmental Organisation (NGO) registered under the laws of Uganda whose objective is to promote the effective understanding, monitoring, implementation, and realization of Economic and Social rights in Uganda. [**The Certificate of Registration of the Applicant is attached and marked "A-1"**].
- 3. THAT the 1st Applicant fulfils its objectives on promotion of the Economic Social Rights including the Right to health and social protection as stipulated in domestic, regional and international human rights instruments through a combination of legal advocacy, strategic litigation, action-oriented research, monitoring and documentation; public information; capacity building; and community outreach, sensitization and empowerment.
- 4. THAT the 1st Applicant also engages in legal advocacy at a regional and international level. At the regional and international level, the Applicant has observer status with the African Commission on Human and Peoples' Rights (African Commission) and the African Committee of Experts on the Rights and Welfare of the Child (ACERWC); which mandates allow for it to monitor the implementation of economic and social rights under the African Charter on Human and Peoples' Rights (ACHPR) and African Charter on the Rights and Welfare of the Child (ACRWC) including the Right to health and Social Protection.
- 5. The 1st Applicant has also been active in monitoring the right to health and social protection in Uganda and reporting to international mechanisms including the Universal Periodic Review (UPR). In 2021, the applicant coordinated the preparation and drafting of the Civil

Society Organizations (CSOs) Alternative Report for the Universal Periodic Review (UPR) on the status of implementation of economic and social rights including the Right to health and social protection.

6. That the 1st Applicant has played a notable and influential role in monitoring, examining and studying the use of Uganda's National ID system in Uganda from 2019 to 2022, and undertook a joint in-depth qualitative research on the impact of this national ID system on the human rights to health and social security for women and older persons and developed a report based on research undertaken between November 2020 and May 2021 [**Attached is the Report titled "Chased Away and Left to Die" marked "AA"**],
7. The research focused primarily on the human rights impact of requiring National Identity Card, Number, or Register for access to health care and social benefit programs, and more specifically how this requirement, with its basis in the 2015 Registration of Persons Act (ROPA), affected women and older persons living in extreme poverty.
8. That in 2014, Uganda commenced the national ID card project with a mass enrolment exercise which sought to collect the biographic and biometric information of all adult's citizens. [See Neema Iyer, [Digital Identity in Uganda: Case Study Conducted as Part of a Ten-country exploration of Socio-digital ID Systems in Parts of Africa, 2021](https://www.africaportal.org/publications/digital-identity-uganda-case-study-conducted-part-ten-country-exploration-socio-digital-id-systems-parts-africa/) accessed at <https://www.africaportal.org/publications/digital-identity-uganda-case-study-conducted-part-ten-country-exploration-socio-digital-id-systems-parts-africa/> last accessed 22nd April 2022]
9. That previously, Ugandans relied on a wide variety of functional IDs, such as Voter's ID cards, drivers' licenses baptism cards, graduated tax slips, and letters from the LC1 Chairperson; refugees were issued cards through a partnership between the Ugandan Office of the Prime Minister and the United Nations High Commission for Refugees (UNHCR).
10. That the National Identification and Registration Authority (NIRA) issued two credentials—the National ID Card (NIC) and the National ID Number (NIN)—and also built a central database, the National Identification Register (NIR) and long after the initial mass registration, people in Uganda continue to interact with NIRA to register; collect cards; replace lost, stolen, or damaged IDs; and correct errors.
11. Today, those who missed out on a mass registration drive must either travel to registration points at NIRA's newly established district offices (currently in 117 out of 146 districts in Uganda) or to NIRA headquarters in the capital of Kampala. Otherwise, they must wait until NIRA conducts one of its irregular mop-up drives—onetime registration or issuance exercises where NIRA staff travel to local communities to try and enrol those who have not yet signed up or to issue cards that have been printed. [**Attached is the Statement to Parliament on the Decentralisation of NIRA Services, March 2020 marked "A-2"**].
12. That there is little flexibility in when and where individuals could come and register because they had to wait for NIRA to visit an accessible location. The process often required returning to the registration point multiple times, sometimes five or six days in a

row due to limited registration officers or sound equipment to serve the long queues. Repeated travel meant that individuals needed to incur significant costs and were unable to engage in normal livelihood activities for periods of time.

13. That by establishing few registration points, accommodations for those who were elderly, sick, disabled, or had limited mobility are insufficient. Difficulties registering are also common among those who were illiterate or not able to understand the registration forms, which were available only in English, requiring additional costs.
14. During the registration process, many had difficulty submitting their biometric information, in the form of fingerprint scans and facial photographs. Others were not able to provide sufficient documentation, such as birth certificates or baptism certificates, in order to register.
15. That the processing of data by NIRA and the verification of citizenship has led to significant delays, and that many who attempted to register have still not received a NIN or NIC despite having submitted their information. Members of certain tribal groups, including the Maragoli, and those unable to provide sufficient documentation have also been unable to complete the registration process. Since individual information is held centrally by NIRA, it is difficult for these individuals to determine the status of their registration unless they are able to travel to Kampala. **[Attached is the Report of the Auditor General on the Financial Statements of the National Identification and Registration Authority for the Year Ended 30th June 2019 marked “A-3”].**
16. As at 2019, only 12.7 million cards had been issued according to an audit of NIRA’s accounts by the Office of the Auditor General. **[Attached is the Auditor General’s Value for Money Audit Report on the Identification and Registration of Persons by the National Identification and Registration Authority (NIRA), 2018 marked “A-4”].**
17. That based on an adult population of about 18.9 million people in 2019, using national population projections by the Uganda Bureau of Statistics (UBOS), this means that only 67% of the adult population had a National Identity Card in 2019, leaving 33% of Ugandans without a National Identity Card.
18. That the Minister of Internal Affairs released figures to the effect that National Identification Regulatory Authority had printed 18.32 million cards as of March 2020, and of those, only 15.23 million had actually been issued. As a result, assuming an adult population that Uganda Bureau of Statistics projected to reach 19.7 million in 2020, this means that at least 23% of Ugandans were without a National Identity Card. This figure does not include those who have significant errors in their particulars, or those whose card has been lost or stolen. **[Attached is the Acceptance Speech of Ms. Rosemary Kisembo, Executive Director of NIRA, May 2021 marked “A-5” and accessed at <https://www.nira.go.ug/about-nira/edz-message/acceptance-speech-of-the-executive-director> last accessed 22nd April 2022]**

19. While NIRA offered guidance on how to estimate an individual's age using historical events, many older persons report that the younger officials were not familiar with local history (and often did not appear interested in achieving accuracy). As a result, errors in respect to age, especially of older persons have been reported and impeded access to social protection.
20. The Ministry of Gender, Labour and Social Development (MGLSD) is mandated to promote and protect the rights of older persons in Uganda. In 2010, MGLSD began piloting the Expanding Social Protection Programme (ESP) with the support of Irish Aid, DFID, and UNICEF.
21. That Uganda's National Policy for Older Persons, 2009, sets out the guiding principles of equal treatment, social inclusion and the provision of livelihood support for older persons. It further identifies the provision of direct income support and social insurance as key social protection instruments for older persons. **[Attached is the National Policy for Older Persons, 2009 marked "A-6"]**.
22. The SCG has been a popular and promising programme with impact evaluations suggesting that it brings about reductions in extreme poverty; increases household expenditure; improves children's educational attainment; improves food security, access to markets, and savings; and stimulates marketplaces. **[Attached is the Quantitative Impact Evaluation of the SAGE programme marked "A-7"]**.
23. At the commencement of the program, data from Uganda Registration Services Bureau (URSB) was done in partnership with UBOS to register births and deaths in the country was utilised. The URSB shared lists of potential beneficiaries with the SAGE programme staff who could then use these lists to identify all older people above a certain age threshold in each district it was working in.
24. That in addition, the programme made use of community targeting by facilitating meetings with Local Council (LC1) chairpersons to validate an older person's age. Everyone was asked to bring any form of ID they had, such as birth certificates, voter ID cards, or even baptism cards. In the absence of any form of ID, the LC1 would verify the age of the person using references to widely known local or historical events. The LC1 would then generate lists, and attach his or her signature, which would be submitted to local Community Development Officers, who in turn shared them with the SAGE programme management staff.
25. That in 2015, during the second phase of the ESP, the operating procedures of the Programme Management Unit (PMU) were restructured. This included automating the process of identifying eligible beneficiaries for the SCG and relying exclusively on data from NIRA's National Identification Register (NIR). **[Attached is the Minister of Gender Labour and Social Development, "SAGE Operations Manual June 2016," June 2017 marked "A-8"]**.

26. That the PMU also verifies the identity of individual beneficiaries using the NIR data (before COVID-19) and fingerprint scanners at different points in the registration, enrolment, and payment process. Therefore, Older persons therefore must be included in the NIR, with accurate details, if they want to access the SCG. They sometimes must also biometrically authenticate using a fingerprint scanner. **[Attached is the Statement on the National Roll Out of the Senior Citizens Grants Under the Social Assistance Grants for Empowerment marked “A-9”]**.
27. That participating in the SCG cash transfer programme now requires a triple registration process: first, registration with NIRA for a national ID; second, registration and enrolment with the ESP for the programme itself, which is only possible if the first registration has been completed; and third, registration with the payment service provider who will be issuing the actual cash. **[Attached is the Response to Parliament on a Question Raised by Hon. Kamateeka Jovah on Verification and Enrolment of New Eligible Beneficiaries under the Social Assistance Grants for Empowerment (SAGE) marked “A-10”]**
28. That Government of Uganda’s policy through the Ministry of Health requiring presentation of a National Identity Card and / or National Identification Number to access to public health facilities and services has become a significant barrier to accessing health services to which individuals are entitled and leads to exclusion of some individuals who are unable to present their National Identity Cards or National Identity Numbers.
29. That subsequently, the Government of Uganda established the Expanding Social Protection (ESP) programme and introduced the Senior Citizens Grant (SCG) as part of the Social Assistance Grants for Empowerment (SAGE) scheme, followed subsequently by the official National Social Protection Policy, 2015. As a result, the Government through the Ministry of Gender Labour and Social Development pays a regular monthly pension of UGX 25,000 (approximately US\$ 6.70) per month to over 150,000 older persons in bi-monthly instalments.
30. That when the Senior Citizens Grant (SCG) was first piloted, the majority of recipients did not hold identity cards as they were born at a time when there was no birth or Identity registration system in place and as a result had to register for the National identification for the first time in their lives in order to access SAGE grants.
31. That to become a new beneficiary of SAGE you must have completed the registration process for the national ID and have been successfully included in NIRA’s National Identity Register (NIR). That the mandatory requirement of use of National Identity Cards or National Identification numbers to receive social protection services affects vulnerable people who have not enrolled on the National Identification Register.
32. That it was often those in the lowest wealth quintiles who were least likely to have a national ID. **[Attached is the Committee on Defence and Internal Affairs, “Report of the Committee of Defence and Internal Affairs on the Registration of Persons Bill, 2014 (Including Minority Report) marked “A-11”]**.

33. The State of Older Persons Report, 2020 highlights that over 60 per cent of persons aged 65 years and above in pilot districts of the SCG are receiving the pension, increasing to over 80 per cent benefiting in nine of the pilot districts. In contrast, coverage of SCG is much lower in roll-out districts, where the SCG is not universal, with less than 40 per cent of older persons reached in most of the districts and faces challenges including; difficulties in identifying and registering beneficiaries, timely and regular payments, and the accessibility of payment points for older persons [**Attached is the State of Older Persons Report, 2020 marked “A-12”**].
34. According to the State of Older Persons Report, 2020, the highest poverty rates are found among older persons aged above 75 years at 21 per cent. Almost 45 per cent of older persons live under the international extreme poverty line of US\$ 1.90 (PPP) per day, or UGX 2,700, whereas only less than 4 per cent older persons would be classified as ‘non-poor’, in other words living on at least US\$10 PPP and above per day—or UGX 13,700.
35. That the biometric verification through fingerprint scanners regularly fails and affects the rights of older persons who are beneficiaries under the SCG whose fingerprints have been worn away due to years of manual labour and have to travel to pay points to verify their identity and finger prints. This leads to painful scenes where frail older persons are literally carried to payment points to verify their fingerprints.
36. That by the Government of Uganda’s reliance of the National identity system database as the single source “gospel truth” to confirm the beneficiaries of the SCG leads to violation of right to social protection and security.
37. That in 2019, the Ministry of Health (MOH) began announcing that the NIC would be a mandatory requirement to access any public health services, however strictly enforcing the national ID requirement would result in people being denied health care, including ‘deserving’ beneficiaries.
38. That local health workers and community officials rarely have access to equipment such as fingerprint scanners or card readers. For those who are rejected or chased, trying to access care often means spending money. This could involve the cost of traveling back and forth to the health centre, soliciting the LC1 Chairperson to travel with you to beg for access, or getting family members to bring you the necessary documents.
39. That the lack of accountability and redress mechanisms in registration for IDs is an impediment to the registration of persons and leads to violation of human rights. In Uganda An accountability mechanism specific to the National Identification system, as foreseen in Section 83 of ROPA, appears to be non-existent at present.
40. That whatever is stated hereinabove is true and correct to the best of my knowledge and belief save for paragraphs whose source of information is disclosed herein.

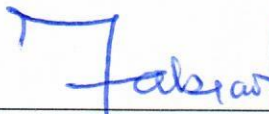
SWORN at _____ KAMPALA this 25th day of 04 2022.

By the said **KIIRA BRIAN ALEX.**

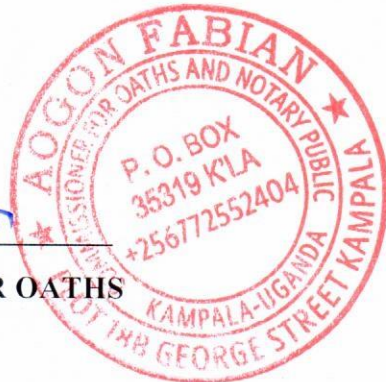


DEPONENT

BEFORE ME



A COMMISSIONER FOR OATHS



Drawn and Filed by:

M/s ALP Advocates,
Lotis Towers, 5th Floor,
Plot 16 Mackinnon Road, Nakasero,
P.O Box 28611
Kampala, Uganda.
Email: Info@alp-ea.com

THE REPUBLIC OF UGANDA
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MISCELLANEOUS CAUSE NO. _____ OF 2022

- 1. **INITIATIVE FOR SOCIAL AND ECONOMIC RIGHTS (ISER) LTD** **APPLICANTS**
- 2. **THE UNWANTED WITNESS (U) LIMITED**
- 3. **HEALTH EQUITY AND POLICY INITIATIVE LIMITED**

VERSUS

- 1. **THE ATTORNEY GENERAL**
- 2. **NATIONAL IDENTIFICATION REGISTRATION AUTHORITY (NIRA)** **RESPONDENTS**

AFFIDAVIT IN SUPPORT

I **DOROTHY MUKASA**, of c/o ALP Advocates, Lotis Towers, 5th Floor, Plot 16 Mackinnon Road, P.O. Box 28611 Kampala, do solemnly swear or (affirm) as hereunder;

- 1. THAT I am a female adult Ugandan of sound mind, the Executive Director of Unwanted Witness (Hereinafter referred to as UW), the 2nd Applicant herein, and I swear this affidavit in that capacity.
- 2. THAT the 2nd Applicant is a local independent, not-for-profit human rights Civil Society registered under the laws of Uganda whose objectives are to inter alia; Contribute to entrenchment of effective, and efficient operational environment for enjoyment of human rights through highlighting the challenges facing human rights; Establish and promote initiatives necessary for effective advocacy in human rights through utilizing various media platforms; Encourage close collaboration and networking among human rights activists through opportunity creation, sharing forums and information exchange on human rights. **[The Certificate of Registration of the Applicant is attached and marked "AB -1"]**.
- 3. THAT the 2nd Applicant executes its objectives through the effective and efficient use of the internet/ online activism, through networking, and strengthening capacities of citizens for collective Advocacy and Synergy.

4. THAT the 2nd Applicant has been following the evolution and development of the digital Identity system in Uganda since its inception and has conducted research, written legal opinions, reports and Briefs on Uganda's Digital ID to document its impact on the rights of Ugandans.
5. THAT in November 2020 and May 2021, the 2nd Applicant together with Digital Welfare State and Human Rights Project at the Center for Human Rights and Global Justice (CHRGJ) based at NYU School of Law in New York City, United States of America, and the Initiative for Social and Economic Rights (ISER) undertook research on the impacts mandatory requirement of the National IDs to access public welfare services and developed a comprehensive report named "Chased Away and Left to Die". **(See copy of the research report is attached marked general annexure "AA")**
6. THAT the research indicated that the mandatory requirement of National IDs has caused the severe exclusion of Ugandans especially women and the older persons to access Health and the Social Assistance Grant for Empowerment (SAGE) benefits respectively.
7. THAT the Uganda National Digital Identity System processes have deviances that impact greatly on the lives of Ugandans proportionately limiting the enjoyment of citizens' fundamental human rights which exacerbate the already existing inequalities in social and economic status among the majority poor population.
8. THAT the 2nd Applicant also conducted research that covered the areas of Kampala, Wakiso, and Kasese, where interviews were obtained from respondents who were above 18 years, to establish; the impact of the National ID system on the protection of fundamental human rights; and the impact of the National ID on citizen's enjoyment of services in Uganda.
9. That a report was developed and named "Uganda's Digital ID System: A cocktail of Discrimination", which indicated that 70% of the respondents said that they were required to present a National ID and 85% of these respondents were denied a public service for not having a National ID. **(A copy of the report is attached hereto and marked "AB-2 ")**
10. That I swear this Affidavit in support of an application for enforcement of enjoyment of the rights to health and the right to social protection for older persons.
11. That whatever is stated hereinabove is true and correct to the best of my knowledge and belief save for paragraphs whose source of information is disclosed herein.

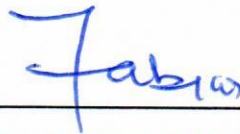
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By the said **DOROTHY MUKASA**

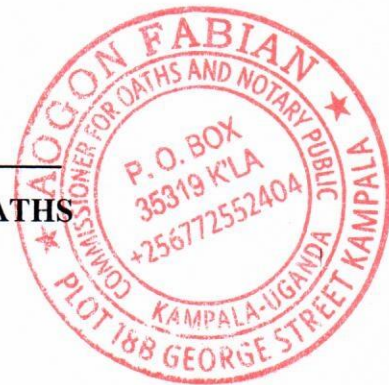


DEPONENT

BEFORE ME



A COMMISSIONER FOR OATHS



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M/s ALP Advocates,
Lotis Towers, 5th Floor,
Plot 16 Mackinnon Road, Nakasero,
P.O Box 28611
Kampala, Uganda.
Email: Info@alp-ea.com

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- 3. HEALTH EQUITY AND POLICY INITIATIVE (HEAPI) LTD]===APPLICANTS

VERSUS

- 1. THE ATTORNEY GENERAL]
- 2. NATIONAL IDENTIFICATION REGISTRATION AUTHORITY (NIRA)]==RESPONDENTS

AFFIDAVIT IN SUPPORT

I, ODUR ANTHONY of c/o, M/s ALP Advocates, Lotis Towers, 5th Floor, Plot 16 Mackinnon Road, Nakasero, P.O. Box 28611, Kampala, do solemnly swear and state as follows that:

- 1. THAT I am a male adult Ugandan of sound mind, a human rights lawyer passionate about health justice, and the Executive Director of the 3rd Applicant whose objective is to ensure that laws and policies are used as primary tools for the promotion and protection of health and human rights in Uganda, and do swear this affidavit in that capacity. (A copy of HEAPI's Certificate of Incorporation is attached and marked "OA 1")
- 2. THAT I am an active member of the Health and Disability Rights Working Groups of the Network of Public Interest Lawyers (NETPIL), School of Law, Makerere University; and a fellow working with the Centre for Strategic Litigation, (CSL), a Tanzania based not for profit organisation that seeks to advance the vision of a just and tolerant society, and a vibrant and inclusive democracy grounded in respect for the rule of Law and justice for all.
- 3. THAT I know that government is the primary provider of medical services for most individuals in Uganda and has approximately 3,133 public health facilities spread across the country. (A screenshot of Ministry of Health Hospital Information accessed on

20th April 2022 at <https://www.health.go.ug/hospitals/>) is attached hereto and marked "OA 2")

4. THAT by policy I also know that the Ministry of Health as per its Health Management Information System all patients are required to be identified by the National Identification Number (NIN) for the sole purpose of eliminating multiple issuance of same medications to same patients at different service points. **(A copy of the Presentation on Integration of Services with the National Identification System, Uganda's case by the 2nd Respondent's Director Registrations and Operations delivered at the 3rd Annual Conference for the ID4Africa Movement Windhoek, Namibia April 2017 is attached hereto and marked "OA 3"; page 9)**
5. THAT on the 11th March 2020, Government of Uganda through the Minister of State for Internal Affairs also reaffirmed the requirement of the physical National ID as a primary form of identification persons accessing the public services including health. **(A Copy of the Addendum to the Statement made to Parliament On 3rd March 2020 on Statement to Parliament on Decentralization of NIRA Services is attached hereto and marked "OA 4"; See, page 4)**
6. THAT I also know that the Auditor General on the 30th December, 2020 acknowledged that the delayed issuance of cards to the owners implied that they would not be able to access a number of services including health that require an Identity card. **(A copy of the Auditor General's Report on the Audit of Financial Statements of National Identification and Registration Authority for the Year Ended 30th June 2020 is attached hereto and marked "OA 5"; See, page 12)**
7. THAT from the feedback I got from our community mobilizer Aryemo Anna and a regular user of Lira Regional Referral Hospital, I noted that patients with National IDs at the aforementioned facility are given priority over those without.
8. THAT as a lawyer who avidly advocates for increased access to healthcare services for the benefit of all persons, I know that the aforementioned practice of only considering patients in possession of National IDs is discriminatory and offends a bundle of rights that include the fundamental rights to life, health, equal treatment, and human dignity set out in the

Ugandan constitution and the different International Human Rights Instruments for Uganda is signatory.

9. THAT I also know that Government has admitted that there are inherent challenges of the registration processes regarding National ID system which caused some of the older persons especially the frail and sick to miss out on being registered thus exacerbating inequity and inequality for those entitled to benefit from social protection programmes. **(A copies of the State of Uganda Population Report 2019 and statement of the Minister of State for Elderly Affairs dated 17th February 2022 are respectively attached and marked "OA 6" & "OA 7" See: pages 49 & 3 respectively)**
10. THAT in addition to the above, I also know that threat to insist and/or the insistence of the use of the National ID as the only source of identification inhibits the implementation of the progressive interventions for improving population health in addition to impeding the set target for increasing the proportion of the population accessing universal healthcare from 44% in 2018 to 60% as laid out in the **Third National Development Plan (NDP III) 2020/21 – 2024/25. (A copy of the Third National Development Plan (NDP III) 2020/21 – 2024/25 is attached hereto and marked "OA 8"; See; pages 156 & 161)**
11. THAT I also know the Government's failure to allow the use of other means and forms of identification in the promotion, respect and upholding of the rights to social protection of older persons under the SAGE Program and access to health services is contrary to the Constitutional mandate of the Respondents under **Articles 8A, 20, 21, 22, 33 (1), 35 & 45 of the Constitution, and Objectives 7, 14 & 20 of the National Objectives and Directive Principles of State Policy.**
12. THAT I know that the Government of Uganda through Ministry of Health (MoH) is duty bound under **Objectives I(i), XI(i), XIV, & XX of National Objectives and Directive Principles of State Policy; and Articles 8A, 20, 21, 24, & 45 of the Constitution of the Republic of Uganda, 1995, as amended** to ensure that all developmental efforts are directed at guaranteeing maximum social well-being of the people which includes facilitating direct provision of basic medical services without discrimination.
13. THAT it is interest of justice all the reliefs sought in this Application be granted.
14. THAT Whatever I have stated herein is true to the best of my knowledge and belief save for the paragraphs whose source of information is disclosed therein.

SWORN at _____ KAMPALA this 25th day of 04 2022.

By the said ODUR ANTHONY.

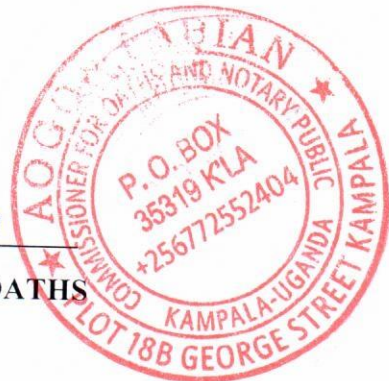


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| 3. HEALTH EQUITY AND POLICY INITIATIVE (HEAPI) LTD | | |
| | | ===APPLICANTS |

VERSUS

- | | | |
|---|--|-----------------------|
| 1. THE ATTORNEY GENERAL | | |
| 2. NATIONAL IDENTIFICATION REGISTRATION AUTHORITY (NIRA) | | |
| | | ===RESPONDENTS |

AFFIDAVIT IN SUPPORT

I, **ARYEMO ANNA** of c/o, M/s ALP Advocates, Lotis Towers, 5th Floor, Plot 16 Mackinnon Road, Nakasero, P.O. Box 28611, Kampala, do solemnly swear and state as follows that:

1. THAT I am a female adult Ugandan of sound mind, community mobiliser working with the 3rd Applicant, holder of National ID No. CF5103103HNTH and do swear this affidavit in that capacity.
2. THAT I am a mother of 8 children, grandmother of 4, a resident of Anai Pida cell, Anai Ward, Lira City West Division, Lira City living with HIV, and a crusader for the right of people living with HIV to access life-saving HIV treatment free from stigma and discrimination.
3. THAT I am very keen on the welfare and interests of persons living with HIV and my work involves informing and organizing community members for awareness meetings on patients' rights and health related issues on behalf of the 3rd Respondent.
4. THAT because of my HIV status, I am a regular patient of Lira Regional Referral Hospital where I go for monthly medical and viral load checkups. This exercise involves continuous engagement in HIV care services which includes general diagnosis, blood tests, weight and

height examinations and speaking to a medical officer who then prescribes drugs to be taken in the course of the month.

5. THAT I have been observant that during the routine checkups at LIDC, Lira Regional Referral Hospital, nursing officers on duty call out patients to first present their National IDs and then forward their prescription and record book.
6. THAT on such occasions I have witnessed nurses considering patients with National IDs and attending to them first and asking those without to wait.
7. THAT I also know that the habit of conditioning persons living with HIV by nurses at Lira Regional Referral Hospital to wait for care services on account of not having National IDs exacerbates the existential stigma and discrimination.
8. THAT the aforementioned practice encourages persons living with HIV to disregard strict adherence to medication in addition to causing them to shy away from seeking medical attention for fear of being discriminated which in turn causes depression and uncalled for deaths among persons living with HIV.
9. THAT from the patients' rights trainings, I have received from facilitators 3rd Applicant, I know that the requirement to present National IDs impedes access to healthcare services for persons living HIV and as such violating their right to health contrary to **Articles 8A, 20, 21, 22, & 45 of the Constitution, and Objective XX of the National Objectives and Directive Principles of State Policy.**
10. THAT I know that it is difficult to process a National ID as is the case with my brother in law's son Onapa Jonathan who is equally living with HIV and has encountered challenges in obtaining a National ID from 2nd Respondent.
11. THAT it is the constitutional mandate of the Respondents to respect, uphold and promote the inherent human rights guaranteed by the constitution, including the right to social protection older persons, and the right to access to health services.
12. THAT it is interest of justice all the reliefs sought in this Application be granted.
13. THAT Whatever I have stated herein is true to the best of my knowledge and belief save for the paragraphs whose source of information is disclosed therein.

SWORN at LIRA by the said

|

ARYEMO ANNA

this 22nd day of

April

2022

|

|

Amma
DEPONENT

CERTIFICATE OF TRANSLATION

I, OKELLOWANGE ANNE being fluent in both English and Leb Lango have explained to ARYEMO ANNA, the contents of her Affidavit and she appears to me to have understood the same before signing.

[Signature]

TRANSLATOR

BEFORE ME:



Drawn & Filed By: -

M/s ALP Advocates,
Lotis Towers, 5th Floor,
Plot 16 Mackinnon Road, Nakasero
P.O. Box 28611, Kampala
info@alp-ea.com.

THE REPUBLIC OF UGANDA
IN THE HIGH COURT OF UGANDA AT KAMPALA
(CIVIL DIVISION)

MISCELLANEOUS CAUSE NO. _____ OF 2022

- 1. INITIATIVE FOR SOCIAL AND ECONOMIC RIGHTS (ISER) LTD** **APPLICANTS**
- 2. THE UNWANTED WITNESS (U) LIMITED**
- 3. HEALTH EQUITY AND POLICY INITIATIVE LIMITED**
VERSUS
- 1. THE ATTORNEY GENERAL**
- 2. NATIONAL IDENTIFICATION REGISTRATION AUTHORITY (NIRA)** **RESPONDENTS**

AFFIDAVIT IN SUPPORT

I **CHEPURAI LOMOR**, of c/o ALP Advocates, Lotis Towers, 5th Floor, Plot 16 Mackinnon Road, P.O. Box 28611 Kampala, do solemnly swear or (affirm) as hereunder;

1. That I am a female adult Ugandan of sound mind, a resident of Alakas Village, Amudat Sub county, Amudat District unemployed and swear this affidavit in that capacity.
2. That I am unaware of my exact date and month of birth but my memory begins the year Chief Lorika was killed in **1953** and I was only a small girl when it happened, but old enough to be aware of events around me.
3. That I am over **96 years old** and meet the eligibility requirement for SAGE programme for Karamoja region.
4. That I got to know about the SAGE Programme through the Local Chairperson 1 of my village, who informed us that the government will be paying old people monthly.
5. That at the time of registering the beneficiaries for SAGE, I was informed that I could not enroll as I did not have a national ID.
6. Since 2019, I have tried to register for a National Identity card at Amudat Sub County but I have not yet received the card. I have continued to go to NIRA offices always find long queues and I am not attended to.
7. That at the point of registration of my National ID, the enrolment officers were unaware of Pokot history and didn't understand Pokot language and have erroneously registered **03.03.1959** as my date of birth.
8. That I can't read nor write and I am unaware of the process to follow to have my age corrected on my National ID registration form and get enrolled on SAGE programme.
9. That on **23rd February 2019**, I went to the Chairman LC 1-Komole Lonica Chero in verification of my citizenship for purposes of processing a national ID.
10. That my friends in the same age bracket staying in the same village are enjoying the money from the SAGE Programme and I feel excluded since I have no National ID.
11. That whatever is stated hereinabove is true and correct to the best of my knowledge and belief save for paragraphs whose source of information is disclosed herein.

SWORN at Amudat this 16^m Day of March2022

By the said **CHEPURAI LOMOR**



DEPONENT

SWORN at Amudat this __16th Day of_ March, _2022, before me, and I certify that this affidavit was read over in my presence to the deponent **CHEPURAI LOMOR** being illiterate and the nature and contents of the exhibits referred to in the affidavit explained to **CHEPURAI LOMOR** in the POKOT language. The deponent appeared perfectly to understand the same and made his mark thereto in my presence.



COMMISSIONER FOR OATHS

Drawn and filed by:

ALP Advocates

Lotis Tower, 5th floor

Plot No. 16 Mackinnon Road

P.O.Box 28611

Kampala, Uganda.

Tel: +256414671997

Email: info@alp-ea.com

THE REPUBLIC OF UGANDA
IN THE HIGH COURT OF UGANDA AT KAMPALA
(CIVIL DIVISION)

MISCELLANEOUS CAUSE NO. _____ OF 2022

1. **INITIATIVE FOR SOCIAL AND ECONOMIC RIGHTS (ISER) LTD** APPLICANTS
2. **THE UNWANTED WITNESS (U) LIMITED**
3. **HEALTH EQUITY AND POLICY INITIATIVE LIMITED**
VERSUS

1. **THE ATTORNEY GENERAL** RESPONDENTS
2. **NATIONAL IDENTIFICATION REGISTRATION AUTHORITY (NIRA)**

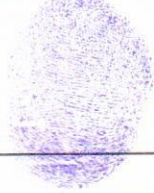
AFFIDAVIT IN SUPPORT

I LOPETA PAUL KICHODA, of c/o ALP Advocates, Lotis Towers, 5th Floor, Plot 16 Mackinnon Road, P.O. Box 28611 Kampala, do solemnly swear or (affirm) as hereunder;

1. That I am a male adult Ugandan of sound mind, a resident of Kasikiroi Village, Amudat Sub county, Amudat District unemployed and swear this affidavit in that capacity.
2. That I am unaware of my exact date and month of birth but my memory begins at the time when Chief Lorika was killed in **1952** and I was only a small boy when it happened, but old enough to be aware of events around me.
3. That I am over **70 years** old and meet the eligibility requirement for SAGE programme for Karamoja region.
4. That I got to know about the SAGE Programme through the Local Chairperson 1 of my village, who informed us that the government will be paying old people monthly.
5. That at the time of registering the beneficiaries for SAGE, I was informed that I could not enroll as I was too young.
6. That I registered for a National Identity card but the National Identity card came back with inconsistencies in age as the National ID reflects **22.04.1958** as my date of birth.
7. That at the point of registration of my National ID, I was escorted by my father who informed the NIRA officials that I was born before the death of the famous Chief Lorika. The enrolment officers were unaware of Pokot history and erroneously registered **22.04.1958** as my date of birth.
8. That I have never tried to engage the NIRA officials to have my National Identity card corrected, as I can't read nor write and I am unaware of the process to follow to have my age corrected on my National ID.
9. That my friends in the same age bracket staying in the same village are enjoying the money from the SAGE Programme and I feel excluded since my National Identity has errors.
10. That whatever is stated hereinabove is true and correct to the best of my knowledge and belief save for paragraphs whose source of information is disclosed herein.

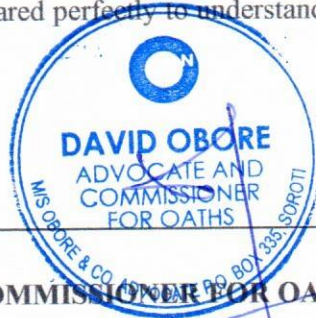
SWORN at Amudat this 16^m Day of March 2022

By the said **LOPETA PAUL KICHODA**



DEPONENT

SWORN at Amudat this 16th Day of March, 2022, before me, and I certify that this affidavit was read over in my presence to the deponent **LOPETA PAUL KICHODA** being illiterate and the nature and contents of the exhibits referred to in the affidavit explained to **LOPETA PAUL KICHODA** in the POKOT language. The deponent appeared perfectly to understand the same and made his mark thereto in my presence.



COMMISSIONER FOR OATHS

Drawn and filed by:

ALP Advocates

Lotis Tower, 5th floor

Plot No. 16 Mackinnon Road

P.O.Box 28611

Kampala, Uganda.

Tel: +256414671997

Email: info@alp-ea.com

THE REPUBLIC OF UGANDA
IN THE HIGH COURT OF UGANDA AT KAMPALA
(CIVIL DIVISION)

MISCELLANEOUS CAUSE NO. _____ OF 2022

- 1. INITIATIVE FOR SOCIAL AND ECONOMIC RIGHTS (ISER) LTD** **APPLICANTS**
2. THE UNWANTED WITNESS (U) LIMITED
3. HEALTH EQUITY AND POLICY INITIATIVE LIMITED
VERSUS
- 1. THE ATTORNEY GENERAL**
2. NATIONAL IDENTIFICATION REGISTRATION AUTHORITY (NIRA) **RESPONDENTS**

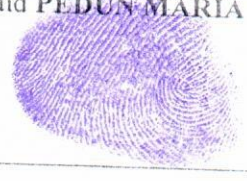
AFFIDAVIT IN SUPPORT

I, **PEDUN MARIA TERESA**, of c/o ALP Advocates, Lotis Towers, 5th Floor, Plot 16 Mackinnon Road, P.O. Box 28611 Kampala, do solemnly swear or (affirm) as hereunder;

1. That I am a female adult Ugandan of sound mind, a resident of Kumi Town Council, Kumi District, unemployed and depone this affidavit in that capacity.
2. That I am **84 years old** and eligible for enrollment for the Social Assistance Grant for Empowerment (SAGE) Programme as a citizen of Uganda.
3. That I got to know about the SAGE Programme through the Local Chairperson 1 of my village, who informed us that the government will be paying old people monthly.
4. That at the time of registering the beneficiaries I did not have a National ID and I was informed that I could not enroll for not having a National ID.
5. That I have never registered for a National Identity card because during the period of mass registration as at the time I was in Kampala for medication.
6. That my friends in the same age bracket staying in the same village are enjoying the money from the SAGE Programme and I feel excluded since I don't have a National Identity card.
7. That whatever is stated hereinabove is true and correct to the best of my knowledge and belief save for paragraphs whose source of information is disclosed herein.


SWORN at Kumi this 17th Day of March 2022

By the said PEDUN MARIA TERESA



DEPONENT

SWORN at KUMI this 17th Day of March 2022, before me, and I certify that this affidavit was read over in my presence to the deponent PEDUN MARIA TERESA being illiterate and the nature and contents of the exhibits referred to in the affidavit explained to PEDUN MARIA TERESA in the ATESO language. The deponent appeared perfectly to understand the same and made his mark thereto in my presence.


COMMISSIONER FOR OATHS

Drawn and filed by:

ALP Advocates
Lotis Tower, 5th floor
Plot No. 16 Mackinnon Road
P.O.Box 28611
Kampala, Uganda.
Tel: +256414671997
Email: info@alp-ea.com

THE REPUBLIC OF UGANDA
IN THE HIGH COURT OF UGANDA AT KAMPALA
(CIVIL DIVISION)

MISCELLANEOUS CAUSE NO. _____ OF 2022

- 1. INITIATIVE FOR SOCIAL AND ECONOMIC RIGHTS (ISER) LTD** **APPLICANTS**
2. THE UNWANTED WITNESS (U) LIMITED
3. HEALTH EQUITY AND POLICY INITIATIVE LIMITED
VERSUS

- 1. THE ATTORNEY GENERAL**
2. NATIONAL IDENTIFICATION REGISTRATION AUTHORITY (NIRA) **RESPONDENTS**

AFFIDAVIT IN SUPPORT

I **OTAJAR JOHN**, of c/o ALP Advocates, Lotis Towers, 5th Floor, Plot 16 Mackinnon Road, P.O. Box 28611 Kampala, do solemnly swear or (affirm) as hereunder;

1. That I am a male adult Ugandan of sound mind, a resident of Bazaar Village, Kumi Town Council, Kumi District, unemployed and swear this affidavit in that capacity.
2. That I am **83 years old** born on **5th October 1939** and eligible for enrollment for the Social Assistance Grant for Empowerment (SAGE) Programme as a citizen of Uganda.
3. That I got to know about the SAGE Programme through the Local Chairperson 1 of my village, who informed us that the government will be paying old people monthly.
4. That I registered for a National Identity card vide **NIN CM49058100PQJG** but the National Identity card came back with errors in respect to my age as it reflected **1949** instead of **1939**, as my year of birth.
5. That I engaged with the LC 1 chairperson who agreed that my national ID does not reflect my true year of birth and he forwarded this information to NIRA officials in the 8th month of 2021, but NIRA officials refused to change the date of birth.
6. That I tried to engage the NIRA officials at Kumi Town Council to have my National Identity card corrected, went to the sub-county where I have been once but never had the errors corrected.
7. That even my wife, Igei Madelena who is in the same age bracket and staying in the same village is enjoying the money from the SAGE Programme and I feel excluded since **my National Identity has errors**.
8. That whatever is stated hereinabove is true and correct to the best of my knowledge and belief save for paragraphs whose source of information is disclosed herein.

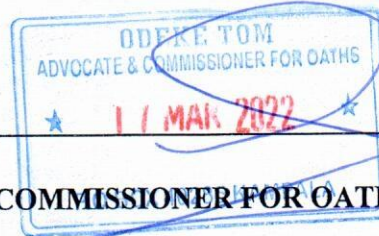
SWORN at Kumithis 17^m Day of MARCH.....2022

By the said **OTAJAR JOHN**



DEPONENT

SWORN at KUMI this 17^m Day of MARCH 2022, before me, and I certify that this affidavit was read over in my presence to the deponent **OTAJAR JOHN** being illiterate and the nature and contents of the exhibits referred to in the affidavit explained to **OTAJAR JOHN** in the ATESO language. The deponent appeared perfectly to understand the same and made his mark thereto in my presence.



COMMISSIONER FOR OATHS

Drawn and filed by:

ALP Advocates

Lotis Tower, 5th floor

Plot No. 16 Mackinnon Road

P.O.Box 28611

Kampala, Uganda.

Tel: +256414671997

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THE REPUBLIC OF UGANDA
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MISCELLANEOUS CAUSE NO. _____ OF 2022

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2. THE UNWANTED WITNESS (U) LIMITED
3. HEALTH EQUITY AND POLICY INITIATIVE LIMITED
VERSUS

- 1. THE ATTORNEY GENERAL**
2. NATIONAL IDENTIFICATION REGISTRATION AUTHORITY (NIRA) **RESPONDENTS**

AFFIDAVIT IN SUPPORT

IIMALING ROSE, of c/o ALP Advocates, Lotis Towers, 5th Floor, Plot 16 Mackinnon Road, P.O. Box 28611 Kampala, do solemnly swear or (affirm) as hereunder;

1. That I am a female adult Ugandan of sound mind, a resident of Abubur Village, Atatur Sub County, Kumi District, unemployed and therefore competent to swear this affidavit.
2. That I am **81 years** born on **13th December 1941** and eligible for enrollment for the Social Assistance Grant for Empowerment (SAGE) Programme as a citizen of Uganda.
3. That I got to know about the SAGE Programme through the Local Chairperson 1 of my village, who informed us that the government will be paying old people monthly.
4. That I registered for a National Identity card vide **NIN CF4702110178FG** but the National Identity card came back with errors in age and reflected that I was born on **13. 12. 1947** instead of **13.12.1941**.
5. That upon delivery of my National ID, I noticed the error and I tried to engage the NIRA officials at Abubur Ward –Abubur Mango Tree Polling Station where I had registered and they just apologized but didn't rectify the error.
6. That my friends in the same age bracket staying in the same village are enjoying the money from the SAGE Programme and I feel excluded since my National Identity card has errors.
7. That I feel terrible that I am unable to get money from the SAGE Programme that would have helped me buy some basic necessities that I don't have currently.
8. That whatever is stated hereinabove is true and correct to the best of my knowledge and belief save for paragraphs whose source of information is disclosed herein.

SWORN at Kumi this 17th Day of March 2022

By the said **IMALING ROSE**



DEPONENT

SWORN at KUMI this 17th Day of March 2022, before me, and I certify that this affidavit was read over in my presence to the deponent **IMALING ROSE** being illiterate and the nature and contents of the exhibits referred to in the affidavit explained to **IMALING ROSE** in the ATESO language. The deponent appeared perfectly to understand the same and made his mark thereto in my presence.



COMMISSIONER FOR OATHS

Drawn and filed by:

ALP Advocates

Lotis Tower, 5th floor

Plot No. 16 Mackinnon Road

P.O.Box 28611

Kampala, Uganda.

Tel: +256414671997

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THE REPUBLIC OF UGANDA
IN THE HIGH COURT OF UGANDA AT KAMPALA
(CIVIL DIVISION)

MISCELLANEOUS CAUSE NO. _____ OF 2022

- 1. INITIATIVE FOR SOCIAL AND ECONOMIC RIGHTS (ISER) LTD** **APPLICANTS**
2. THE UNWANTED WITNESS (U) LIMITED
3. HEALTH EQUITY AND POLICY INITIATIVE LIMITED
VERSUS

- 1. THE ATTORNEY GENERAL**
2. NATIONAL IDENTIFICATION REGISTRATION AUTHORITY (NIRA) **RESPONDENTS**

AFFIDAVIT IN SUPPORT

I **AKELLO IRENE**, of c/o ALP Advocates, Lotis Towers, 5th Floor, Plot 16 Mackinnon Road, P.O. Box 28611 Kampala, do solemnly swear or (affirm) as hereunder;

1. That I am a female adult Ugandan of sound mind, a resident of Aburbur Village, South Division Sub-county, Kumi District, unemployed and swear this affidavit in that capacity.
2. That I was born on **1st January, 1930** and my voters card **No. 07317158** issued on **23rd August-2004** also reflects the same as my date of birth.
3. That I am **92 years old** and I am informed by my son, Achoroi John Peter of Aburbur Village, South Division Sub-county, Kumi District my current caretaker that I should be getting UGX 25,000 monthly that is paid by the government to old people above 80 years under its Social Assistance Grants for Empowerment (SAGE) Programme.
4. That I got to know about the SAGE Programme through my son, Achoroi John Peter who heard that the government will be paying old people in Kumi District who are above 80 years monthly.
5. That at the time of registering the beneficiaries for SAGE Programme, I did not have a National ID and I was informed that I could not access the money government was paying

old people like me because I was not on the list of beneficiaries because I don't have a National ID.

6. I have made attempts to register for a National Identity card but I have never received one.
7. In 2020, whilst I was under the care of my Late Brother I was taken to the NIRA officials and commenced the process of registering for a national ID. Upon my brother's death, I was unable to continue the process on my own as I could not transport myself to the sub-county offices and due to old age I could not walk to the place where they conduct registration.
8. Towards the end of 2021 when I came to stay with my son, he took me to register for a National ID at South Division Sub County, Kumi District where we were informed to wait and come back in January, 2022 as at the time there were no NIRA officials. We are still waiting to be informed when we can go back and register for the National ID.
9. That I tried to engage the LC 1 Chairperson at Aburbur Village to help register for my my National Identity card, but I was informed to wait for the NIRA enrolment exercise to commence and follow up with the NIRA officials at the sub county.
10. That I never registered for a National Identity card because during the period of mass registration I was sick, and could not walk to the registration centre due to old age.
11. That most of my friends in the same age bracket staying in Aburbur village are enjoying the money from the SAGE Programme and I feel excluded since I don't have a National Identity card.
12. That I feel left out because others are getting their SAGE money and am not getting money that would help me get medication for sickness so that I can get relief of the pain.
13. That whatever is stated hereinabove is true and correct to the best of my knowledge and belief save for paragraphs whose source of information is disclosed herein.

SWORN at Kumi.....this 17^m Day of MARCH.....2022

By the said **AKELLO IRENE**



DEPONENT

SWORN at KUMI this 17^m Day of MARCH 2022, before me, and I certify that this affidavit was read over in my presence to the deponent **AKELLO IRENE** being illiterate and the nature and contents of the exhibits referred to in the affidavit explained to **AKELLO IRENE** in the ATESO language. The deponent appeared perfectly to understand the same and made his mark thereto in my presence.



Drawn and filed by:

ALP Advocates

Lotis Tower, 5th floor

Plot No. 16 Mackinnon Road

P.O.Box 28611

Kampala, Uganda.

Tel: +256414671997

Email: info@alp-ea.com

THE REPUBLIC OF UGANDA
IN THE HIGH COURT OF UGANDA AT KAMPALA
(CIVIL DIVISION)

MISCELLANEOUS CAUSE NO. _____ OF 2022

- | | |
|---|----------------------------|
| 1. INITIATIVE FOR SOCIAL AND ECONOMIC RIGHTS (ISER) LTD | :.....: APPLICANTS |
| 2. THE UNWANTED WITNESS (U) LIMITED | |
| 3. HEALTH EQUITY AND POLICY INITIATIVE LIMITED | |
| VERSUS | |
| 1. THE ATTORNEY GENERAL | |
| 2. NATIONAL IDENTIFICATION REGISTRATION AUTHORITY (NIRA) | :.....: RESPONDENTS |

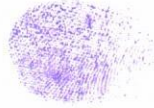
AFFIDAVIT IN SUPPORT

I **ACOM SARAH**, of c/o ALP Advocates, Lotis Towers, 5th Floor, Plot 16 Mackinnon Road, P.O. Box 28611 Kampala, do solemnly swear or (affirm) as hereunder;

1. That I am a female adult Ugandan of sound mind, a resident of Gorja Village, Kadami Sub county, Kumi District unemployed and swear this affidavit in that capacity.
2. That in **March, 2021** I went to Nyeru Health Centre III to receive medical services since I was ill.
3. That when I reached Nyeru Health Centre III the medical officer at the point of intake and registration requested for my National Identity card which I did not possess one at that time.
4. That I was informed by medical officer that I would not receive any medical services since I did not present my National ID.
5. That I was informed by the medical officer that in the alternative, I must present my spouse's or any one of my parents' National ID to access medical services.
6. That I went back home to look for my spouse's National Identity card, I had to wait until my husband got back so that I could access the health centre.
7. That I was attended to and provided with medical services only after I was able to present my husband's national ID.
8. That since then I fear going to Nyeru Health Centre III for treatment, if I am sick I buy some drugs from a nearby drug shop to get some relief.
9. That when my child gets sick, if I am also required to present a National ID, because I don't have one, I take the child to a clinic and not Nyeru Health Centre III.
10. That whatever is stated hereinabove is true and correct to the best of my knowledge and belief save for paragraphs whose source of information is disclosed herein.

SWORN at Kumi this 17^m Day of MARCH 2022

By the said **ACOM SARAH**



DEPONENT

SWORN at KUMI this 17^m Day of MARCH 2022, before me, and I certify that this affidavit was read over in my presence to the deponent **ACOM SARAH** being illiterate and the nature and contents of the exhibits referred to in the affidavit explained to **ACOM SARAH** in the ATESO language. The deponent appeared perfectly to understand the same and made his mark thereto in my presence.



Drawn and filed by:

ALP Advocates

Lotis Tower, 5th floor

Plot No. 16 Mackinnon Road

P.O.Box 28611

Kampala, Uganda.

Tel: +256414671997

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- 1. INITIATIVE FOR SOCIAL AND ECONOMIC RIGHTS (ISER) LTD** ::::::::::::::: **APPLICANTS**
- 2. THE UNWANTED WITNESS (U) LIMITED**
- 3. HEALTH EQUITY AND POLICY INITIATIVE LIMITED**
- VERSUS**
- 1. THE ATTORNEY GENERAL**
- 2. NATIONAL IDENTIFICATION REGISTRATION AUTHORITY (NIRA)** ::::::::::::::: **RESPONDENTS**

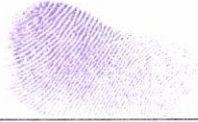
AFFIDAVIT IN SUPPORT

I **MADUDU MARY**, of c/o ALP Advocates, Lotis Towers, 5th Floor, Plot 16 Mackinnon Road, P.O. Box 28611 Kampala, do solemnly swear or (affirm) as hereunder;

1. That I am a female adult Ugandan of sound mind, a resident of Gorja Village, Kadami Sub county, Kumi District unemployed and swear this affidavit in that capacity.
2. That in **October, 2021** I went to Nyeru Health Centre III to receive medical services since I was ill.
3. That when I reached Nyeru Health Centre III the medical officer at the point of intake and registration requested for my National Identity card which I did not possess one at that time.
4. That I was informed by medical officer that I would not receive any medical services since I did not present my National ID.
5. That I was informed by the medical officer that in the alternative, I must present my spouse's or any one of my parents' National ID to access medical services.
6. That I went back home to look for my spouse's National Identity card, I had to wait until my husband got back so that I could access the health centre.
7. That I was attended to and provided with medical services only after I was able to present my husband's national ID.
8. That since then I fear going to Nyeru Health Centre III for treatment, If I am sick I buy some drugs from a nearby drug shop to get some relief.
9. That when my child gets sick, If I am also required to present a National ID, because I don't have one, I take the child to a clinic and not Nyeru Health Centre III.
10. That I applied for my National ID vide Application ID No. 11208500059XV at Mukongoro Sub county and haven't yet received my National ID.
11. That whatever is stated hereinabove is true and correct to the best of my knowledge and belief save for paragraphs whose source of information is disclosed herein.

SWORN at KUMI.....this 17^m.....Day of MARCH.....2022

By the said **MADUDU MARY**



DEPONENT

SWORN at KUMI this 17^m Day of MARCH . 2022, before me, and I certify that this affidavit was read over in my presence to the deponent **MADUDU MARY** being illiterate and the nature and contents of the exhibits referred to in the affidavit explained to **MADUDU MARY** in the ATESO language. The deponent appeared perfectly to understand the same and made his mark thereto in my presence.



Drawn and filed by:

ALP Advocates

Lotis Tower, 5th floor

Plot No. 16 Mackinnon Road

P.O.Box 28611

Kampala, Uganda.

Tel: +256414671997

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2. THE UNWANTED WITNESS (U) LIMITED
3. HEALTH EQUITY AND POLICY INITIATIVE LIMITED
VERSUS

- 1. THE ATTORNEY GENERAL**
2. NATIONAL IDENTIFICATION REGISTRATION AUTHORITY (NIRA) **RESPONDENTS**

AFFIDAVIT IN SUPPORT

I ASEGE MARABU, of c/o ALP Advocates, Lotis Towers, 5th Floor, Plot 16 Mackinnon Road, P.O. Box 28611 Kampala, do solemnly swear or (affirm) as hereunder;

1. That I am a female adult Ugandan of sound mind, a resident of Abubur Village, Atatur Sub County, Kumi District unemployed and swear this affidavit in that capacity.
2. That I am **81 years old**, born on **12th May 1941** and holder of **National ID No. CF41021103QWKE**, and eligible for enrollment for the Social Assistance Grant for Empowerment (SAGE) Programme as a citizen of Uganda.
3. That I got to know about the SAGE Programme through the Local Chairperson 1 of my village, who informed us that the government will be paying old people monthly.
4. That I registered for a National Identity card and my National ID correctly reflects my date of birth as **12.05.1941**.
5. That in November 2021 at the time of registering the beneficiaries for SAGE at South Division, Boma Grounds, Kumi District they noted my name, but I haven't yet gotten the money.
6. That I have not yet heard of a SAGE enrolment exercise being conducted this year at South Division, Boma Grounds, Kumi District.
7. That my friends in the same age bracket staying in the same village are enjoying the money from the SAGE Programme and I feel excluded.
8. That whatever is stated hereinabove is true and correct to the best of my knowledge and belief save for paragraphs whose source of information is disclosed herein.

SWORN at Kumi.....this 17^m Day of MARCH.....2022

By the said ASEGE MARABU



DEPONENT

SWORN at KUMI this 17^m Day of MARCH 2022, before me, and I certify that this affidavit was read over in my presence to the deponent ASEGE MARABU being illiterate and the nature and contents of the exhibits referred to in the affidavit explained to ASEGE MARABU in the ATESO language. The deponent appeared perfectly to understand the same and made his mark thereto in my presence.



Drawn and filed by:

ALP Advocates

Lotis Tower, 5th floor

Plot No. 16 Mackinnon Road

P.O.Box 28611

Kampala, Uganda.

Tel: +256414671997

Email: info@alp-ea.com

THE REPUBLIC OF UGANDA
IN THE HIGH COURT OF UGANDA AT KAMPALA
(CIVIL DIVISION)

MISCELLANEOUS CAUSE NO. _____ OF 2022

- 1. INITIATIVE FOR SOCIAL AND ECONOMIC RIGHTS (ISER) LTD** **APPLICANTS**
2. THE UNWANTED WITNESS (U) LIMITED
3. HEALTH EQUITY AND POLICY INITIATIVE LIMITED
VERSUS

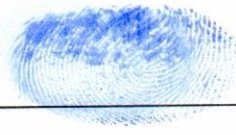
- 1. THE ATTORNEY GENERAL**
2. NATIONAL IDENTIFICATION REGISTRATION AUTHORITY (NIRA) **RESPONDENTS**

AFFIDAVIT IN SUPPORT

I, **AKUMU SOFIA**, of c/o ALP Advocates, Lotis Towers, 5th Floor, Plot 16 Mackinnon Road, P.O. Box 28611 Kampala, do solemnly swear or (affirm) as hereunder;

1. That I am a female adult Ugandan of sound mind, a resident of Pulaka Village, Padolo Parish, Erussi Sub County in Nebbi district, unemployed and swear this affidavit in that capacity.
2. That I am **83 years old** and eligible for enrollment for the Social Assistance Grant for Empowerment (SAGE) Programme as a citizen of Uganda.
3. That I got to know about the SAGE Programme through the Local Chairperson 1 of my village, who informed us that the government will be paying old people monthly.
4. That I registered for a National Identity card but it returned with an error – stating that I was born in **1952** whereas I'm 83 years old.
5. That I tried to rectify the error at Erussi Parish Hall enrolment centre in 2017.
6. That my picture was taken afresh and I was advised by the registration officials to change my name if my National Identity card was to come back corrected as I wanted.
7. That I changed my name to Ruzalia Acoka and date of birth to the correct one of 8th March 1939.
8. That I haven't received the rectified National Identity card to date.
9. That my friends in the same age bracket staying in the same village are receiving the money from the SAGE Programme and I feel excluded since my age was captured wrongly on the National Identity card.
10. That whatever is stated hereinabove is true and correct to the best of my knowledge and belief save for paragraphs whose source of information is disclosed herein.

SWORN at Nebbi this^{17th}.....Day of ^{March}.....2022 by the said AKUMU SOFIA



DEPONENT

SWORN at Nebbi this^{17th}.....Day of ^{March}.....2022, before me, and I certify that this affidavit was read over in my presence to the deponent she being illiterate and the nature and contents of the exhibits referred to in the affidavit explained to her in the Alur language. The deponent appeared perfectly to understand the same and made her mark/signature thereto in my presence.



COMMISSIONER FOR OATHS

Drawn and filed by:

ALP Advocates

Lotis Tower, 5th floor

Plot No. 16 Mackinnon Road

P.O.Box 28611

Kampala, Uganda.

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THE REPUBLIC OF UGANDA
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(CIVIL DIVISION)

MISCELLANEOUS CAUSE NO. _____ OF 2022

- 1. INITIATIVE FOR SOCIAL AND ECONOMIC RIGHTS (ISER) LTD** **APPLICANTS**
- 2. THE UNWANTED WITNESS (U) LIMITED**
- 3. HEALTH EQUITY AND POLICY INITIATIVE LIMITED**
- VERSUS**
- 1. THE ATTORNEY GENERAL**
- 2. NATIONAL IDENTIFICATION REGISTRATION AUTHORITY (NIRA)** **RESPONDENTS**

AFFIDAVIT IN SUPPORT

I, **ACEN ANNA**, of c/o ALP Advocates, Lotis Towers, 5th Floor, Plot 16 Mackinnon Road, P.O. Box 28611 Kampala, do solemnly swear or (affirm) as hereunder;

1. That I am a female adult Ugandan of sound mind, a resident of Opano Village, Central Zone Ward, Nebbi Town Council in Nebbi district, unemployed and swear this affidavit in that capacity.
2. That I am **85 years** born on **10th February 1937**, holder of National ID No. **CF61087103WE1A**, and eligible for enrollment for the Social Assistance Grant for Empowerment (SAGE) Programme as a citizen of Uganda.
3. That I got to know about the SAGE Programme through the Local Chairperson 1 of my village, who informed us that the government will be paying old people monthly.
4. That I registered for a National Identity card but it came back showing that I'm younger than I actually am, stating a wrong year of birth of **1961**.
5. That I thought of trying to rectify the error on my year of birth but I'm very weak to start moving to where they correct these things from.
6. That my friends in the same age bracket staying in the same village are getting the money from the SAGE Programme but I'm not because my National ID shows that I'm not old enough.
7. That whatever is stated hereinabove is true and correct to the best of my knowledge and belief save for paragraphs whose source of information is disclosed herein.

SWORN at Nebbi this17th.....Day ofMarch.....2022 by the said ACEN ANNA

DEPONENT

SWORN at Nebbi this17th.....Day ofMarch.....2022, before me, and I certify that this affidavit was read over in my presence to the deponent she being illiterate and the nature and contents of the exhibits referred to in the affidavit explained to her in the Alur language. The deponent appeared perfectly to understand the same and made her mark/signature thereto in my presence.



COMMISSIONER FOR OATHS

Drawn and filed by:

ALP Advocates

Lotis Tower, 5th floor

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P.O.Box 28611

Kampala, Uganda.

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THE REPUBLIC OF UGANDA
IN THE HIGH COURT OF UGANDA AT KAMPALA
(CIVIL DIVISION)

MISCELLANEOUS CAUSE NO. _____ OF 2022

- 1. INITIATIVE FOR SOCIAL AND ECONOMIC RIGHTS (ISER) LTD** **APPLICANTS**
- 2. THE UNWANTED WITNESS (U) LIMITED**
- 3. HEALTH EQUITY AND POLICY INITIATIVE LIMITED**
- VERSUS**
- 1. THE ATTORNEY GENERAL**
- 2. NATIONAL IDENTIFICATION REGISTRATION AUTHORITY (NIRA)** **RESPONDENTS**

AFFIDAVIT IN SUPPORT

I, **USUTHO FULABIA**, of c/o ALP Advocates, Lotis Towers, 5th Floor, Plot 16 Mackinnon Road, P.O. Box 28611 Kampala, do solemnly swear or (affirm) as hereunder;

1. That I am a female adult Ugandan of sound mind, a resident of Ajigo Village, Muvule Parish, Ngwedo Sub County in Buliisa district, unemployed and swear this affidavit in that capacity.
2. That I am **90 years old** and I am eligible for enrollment for the Social Assistance Grant for Empowerment (SAGE) Programme as a citizen of Uganda.
3. That I got to know about the SAGE Programme through fellow old women in my village who are already benefitting from the programme.
4. That I was not able get registered for a National Identity card because during the period of mass registration, since I was sick and could not get to the registration centre.
5. That my friends in the same age bracket staying in the same village are receiving the money from the SAGE Programme and I am not.
6. That whatever is stated hereinabove is true and correct to the best of my knowledge and belief save for paragraphs whose source of information is disclosed herein.

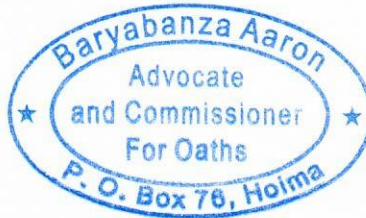
SWORN at Hoima this 22nd Day of March 2022 by the said **USUTHO FULABIA**



DEPONENT

SWORN at Hoima this 22nd Day of March 2022, before me, and I certify that this affidavit was read over in my presence to the deponent she being illiterate and the nature and contents of the exhibits referred to in the affidavit explained to her in the Alur language. The deponent appeared perfectly to understand the same and made her mark/signature thereto in my presence.

COMMISSIONER FOR OATHS



Drawn and filed by:

ALP Advocates
Lotis Tower, 5th floor
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THE REPUBLIC OF UGANDA
IN THE HIGH COURT OF UGANDA AT KAMPALA
(CIVIL DIVISION)

MISCELLANEOUS CAUSE NO. _____ OF 2022

- 1. INITIATIVE FOR SOCIAL AND ECONOMIC RIGHTS (ISER) LTD** **APPLICANTS**
2. THE UNWANTED WITNESS (U) LIMITED
3. HEALTH EQUITY AND POLICY INITIATIVE LIMITED
VERSUS

- 1. THE ATTORNEY GENERAL**
2. NATIONAL IDENTIFICATION REGISTRATION AUTHORITY (NIRA) **RESPONDENTS**

AFFIDAVIT IN SUPPORT

I, **NYIRUCIBA LUCIA**, of c/o ALP Advocates, Lotis Towers, 5th Floor, Plot 16 Mackinnon Road, P.O. Box 28611 Kampala, do solemnly swear or (affirm) as hereunder;

1. That I am a female adult Ugandan of sound mind, a resident of Kisomere Village, Nile Parish, Ngwedo Sub County in Buliisa district, unemployed and swear this affidavit in that capacity.
2. That I cannot tell my exact age but I know I was older than my late husband.
3. That I know that my late husband was born in 1933.
4. That I did not know if I was eligible for enrollment for the Social Assistance Grant for Empowerment (SAGE) Programme as a citizen of Uganda.
5. That I got to know about the SAGE Programme from people around who tell me that some old people are getting money from the government.
6. That I was not registered for a National ID during the period of mass registration because I was sick and admitted at Buliisa General Hospital at the time.
7. That when the NIRA officials came back to Kisomere in January this year [2022], my son [OKUMU ETHIEN) tried having them take my details but they said it wasn't yet time and that they would come back later to take mine.
8. That I am paralyzed from the waist downwards and it's hard travelling from Kisomere to Buliisa town where the NIRA offices are.
9. That whatever is stated hereinabove is true and correct to the best of my knowledge and belief save for paragraphs whose source of information is disclosed herein.

SWORN at Hoima this 22nd Day of March 2022 by the said NYIRUCIBA LUCIA



DEPONENT

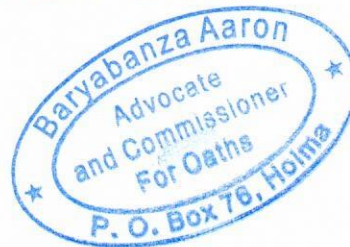
SWORN at Hoima this 22nd Day of March 2022, before me, and I certify that this affidavit was read over in my presence to the deponent she being illiterate and the nature and contents of the exhibits referred to in the affidavit explained to her in the Alur language. The deponent appeared perfectly to understand the same and made her mark/signature thereto in my presence.



COMMISSIONER FOR OATHS

Drawn and filed by:

ALP Advocates
Lotis Tower, 5th floor
Plot No. 16 Mackinnon Road
P.O.Box 28611
Kampala, Uganda.
Tel: +256414671997
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THE REPUBLIC OF UGANDA
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MISCELLANEOUS CAUSE NO. _____ OF 2022

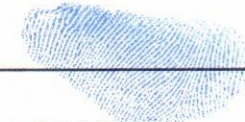
- 1. INITIATIVE FOR SOCIAL AND ECONOMIC RIGHTS (ISER) LTD** **APPLICANTS**
- 2. THE UNWANTED WITNESS (U) LIMITED**
- 3. HEALTH EQUITY AND POLICY INITIATIVE LIMITED**
- VERSUS**
- 1. THE ATTORNEY GENERAL**
- 2. NATIONAL IDENTIFICATION REGISTRATION AUTHORITY (NIRA)** **RESPONDENTS**

AFFIDAVIT IN SUPPORT

I, **OYIKONYINGA YULIAN**, of c/o ALP Advocates, Lotis Towers, 5th Floor, Plot 16 Mackinnon Road, P.O. Box 28611 Kampala, do solemnly swear or (affirm) as hereunder;

1. That I am a female adult Ugandan of sound mind, a resident of Kilyango Village, Nile Parish, Ngwedo Sub County in Buliisa district, unemployed and swear this affidavit in that capacity.
2. That I am **97 years** old, born on **10th October 1924** holder of **National ID No. CF24087109Q94J** and eligible for enrollment for the Social Assistance Grant for Empowerment (SAGE) Programme as a citizen of Uganda.
3. That I got to know about the SAGE Programme through the Local Chairperson 1 of my village, who informed us that the government will be paying old people monthly.
4. That I have never received SAGE money and yet I am 97 years.
5. That whenever SAGE distribution happens, I go to Kisomere trading centre to see if I will be added to the list of beneficiaries but I have never been.
6. That I registered for a National Identity card but I have never received SAGE money.
7. That my age mates staying in the same village are receiving the money from the SAGE Programme but I am not and I feel I am being left out.
8. That whatever is stated hereinabove is true and correct to the best of my knowledge and belief save for paragraphs whose source of information is disclosed herein.

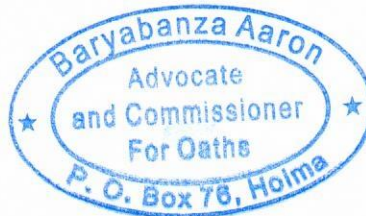
SWORN at Hoima this 22nd Day of March 2022 by the said OYIKONYINGA YULIAN



DEPONENT

SWORN at Hoima this 22nd Day of March 2022, before me, and I certify that this affidavit was read over in my presence to the deponent she being illiterate and the nature and contents of the exhibits referred to in the affidavit explained to her in the Alur language. The deponent appeared perfectly to understand the same and made her mark/signature thereto in my presence.

COMMISSIONER FOR OATHS



Drawn and filed by:

ALP Advocates

Lotis Tower, 5th floor

Plot No. 16 Mackinnon Road

P.O.Box 28611

Kampala, Uganda.

Tel: +256414671997

Email: info@alp-ea.com

THE REPUBLIC OF UGANDA
IN THE HIGH COURT OF UGANDA AT KAMPALA
(CIVIL DIVISION)

MISCELLANEOUS CAUSE NO. _____ OF 2022

- 1. INITIATIVE FOR SOCIAL AND ECONOMIC RIGHTS (ISER) LTD** **APPLICANTS**
2. THE UNWANTED WITNESS (U) LIMITED
3. HEALTH EQUITY AND POLICY INITIATIVE LIMITED
VERSUS
- 1. THE ATTORNEY GENERAL**
2. NATIONAL IDENTIFICATION REGISTRATION AUTHORITY (NIRA) **RESPONDENTS**

AFFIDAVIT IN SUPPORT

I, **BITEHE JANE**, of c/o ALP Advocates, Lotis Towers, 5th Floor, Plot 16 Mackinnon Road, P.O. Box 28611 Kampala, do solemnly swear or (affirm) as hereunder;

1. That I am a female adult Ugandan of sound mind, a resident of Kibambura Village, Ngwedo Parish, Ngwedo Sub County, in Buliisa district, unemployed and swear this affidavit in that capacity.
2. That I am over 100 years old and I am informed by our Parish Chief that I am eligible for enrollment for the Social Assistance Grant for Empowerment (SAGE) Programme as a citizen of Uganda.
3. That my husband is John Mwakali who is also over 100 years old.
4. That both my husband and I have never heard about any money that is given to older persons.
5. That I was not able to register for a National Identity card during the period of mass registration because I was too weak to travel to the registration centre by myself.
6. That whatever is stated hereinabove is true and correct to the best of my knowledge and belief save for paragraphs whose source of information is disclosed herein.

SWORN at Hoima this 22nd Day of March 2022 by the said JANE BITEHE


DEPONENT

SWORN at Hoima this 22nd Day of March 2022, before me, and I certify that this affidavit was read over in my presence to the deponent she being illiterate and the nature and contents of the exhibits referred to in the affidavit explained to her in the Lugungu language. The deponent appeared perfectly to understand the same and made her mark/signature thereto in my presence.


COMMISSIONER FOR OATHS



Drawn and filed by:

ALP Advocates

Lotis Tower, 5th floor

Plot No. 16 Mackinnon Road

P.O.Box 28611

Kampala, Uganda.

Tel: +256414671997

Email: info@alp-ea.com

**THE REPUBLIC OF UGANDA
IN THE HIGH COURT OF UGANDA AT KAMPALA
(CIVIL DIVISION)
MISCELLANEOUS CAUSE NO. _____ OF 2022**

1. INITIATIVE FOR SOCIAL AND ECONOMIC RIGHTS (ISER) LTD APPLICANTS
2. THE UNWANTED WITNESS (U) LIMITED
3. HEALTH EQUITY AND POLICY INITIATIVE LIMITED
VERSUS
1. THE ATTORNEY GENERAL
2. NATIONAL IDENTIFICATION REGISTRATION AUTHORITY (NIRA) RESPONDENTS

AFFIDAVIT IN SUPPORT

I **AUME KETULA**, of c/o ALP Advocates, Lotis Towers, 5th Floor, Plot 16 Mackinnon Road, P.O. Box 28611 Kampala, do solemnly swear and state on oath that;

1. THAT I am a female adult Ugandan of sound mind, a resident of Munda 'B' village, Dabani Sub-county, Busia District, unemployed and swear this affidavit in that capacity.
2. THAT I am **84 years** old born on 9th June 1938, and eligible for enrollment for the Social Assistance Grant for Empowerment (SAGE) Programme as a citizen of Uganda.
3. THAT I got to know about the SAGE Programme in my district about three years ago through the Local Chairperson 1 of my village, who informed us that the government will be paying elderly persons over 80 years old monthly.
4. THAT I was told to add my name on a list of beneficiaries with my National Identity card details. I have never been issued a national Identity card because at the time of mass registration I was hospitalized at Dabani hospital. Then at the time of the second mass registration, I did not learn about the process from my Local Council Chairperson.
5. THAT, later in 2021, I registered under the Application for Registration and National Identification Card - Application ID No. 11438500038WU, and photographs taken for a National Identity card but I have never received the National Identity card nor a national identification number.
6. THAT I went to Busia headquarters for inquiries but the officers on duty did not find my information in the system when they checked.
7. THAT the distance from my home to the place of National Identification registration is very long of about 4 Kilometers which costs around four thousand shillings via boda boda, I cannot transport to the place due to old age.
8. THAT whatever is stated hereinabove is true and correct to the best of my knowledge.

SWORN at Busia District this 15th day of March 2022.

By the said **Aume Ketula**.



DEPONENT

SWORN at Busia this 15th Day of March 2022, before me, and I certify that this affidavit was read over in my presence to the deponent **Aume Ketula**, being illiterate and the contents of the exhibits referred to in this affidavit explained to **Aume Ketula** in the Samia language. The deponent appeared perfectly to understand the same and made their mark thereto in my presence.

SANYA BRIMAYI

0789 39 86 41

BEFORE ME

KHARURI ANNET GYABI
ADVOCATE AND

COMMISSIONER FOR OATHS

A COMMISSIONER FOR OATHS

Drawn and Filed by:

M/s ALP Advocates,
Lotis Towers, 5th Floor,
Plot 16 Mackinnon Road, Nakasero,
P.O Box 28611
Kampala, Uganda.
Email: Info@alp-ea.com

THE REPUBLIC OF UGANDA
IN THE HIGH COURT OF UGANDA AT KAMPALA
(CIVIL DIVISION)

MISCELLANEOUS CAUSE NO. _____ OF 2022

- | | |
|---|----------------------------|
| 1. INITIATIVE FOR SOCIAL AND ECONOMIC RIGHTS (ISER) LTD | :.....: APPLICANTS |
| 2. THE UNWANTED WITNESS (U) LIMITED | |
| 3. HEALTH EQUITY AND POLICY INITIATIVE LIMITED | |
| VERSUS | |
| 1. THE ATTORNEY GENERAL | |
| 2. NATIONAL IDENTIFICATION REGISTRATION AUTHORITY (NIRA) | :.....: RESPONDENTS |

AFFIDAVIT IN SUPPORT

I, **BITEHE JANE**, of c/o ALP Advocates, Lotis Towers, 5th Floor, Plot 16 Mackinnon Road, P.O. Box 28611 Kampala, do solemnly swear or (affirm) as hereunder;

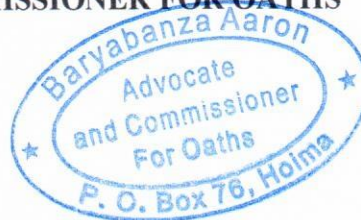
1. That I am a female adult Ugandan of sound mind, a resident of Kibambura Village, Ngwedo Parish, Ngwedo Sub County, in Buliisa district, unemployed and swear this affidavit in that capacity.
2. That I am over 100 years old and I am informed by our Parish Chief that I am eligible for enrollment for the Social Assistance Grant for Empowerment (SAGE) Programme as a citizen of Uganda.
3. That my husband is John Mwakali who is also over 100 years old.
4. That both my husband and I have never heard about any money that is given to older persons.
5. That I was not able to register for a National Identity card during the period of mass registration because I was too weak to travel to the registration centre by myself.
6. That whatever is stated hereinabove is true and correct to the best of my knowledge and belief save for paragraphs whose source of information is disclosed herein.

SWORN at Hoima this 22nd Day of March 2022 by the said JANE BITEHE


DEPONENT

SWORN at Hoima this 22nd Day of March 2022, before me, and I certify that this affidavit was read over in my presence to the deponent she being illiterate and the nature and contents of the exhibits referred to in the affidavit explained to her in the Lugungu language. The deponent appeared perfectly to understand the same and made her mark/signature thereto in my presence.


COMMISSIONER FOR OATHS



Drawn and filed by:

ALP Advocates

Lotis Tower, 5th floor

Plot No. 16 Mackinnon Road

P.O.Box 28611

Kampala, Uganda.

Tel: +256414671997

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**THE REPUBLIC OF UGANDA
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VERSUS
1. THE ATTORNEY GENERAL
2. NATIONAL IDENTIFICATION REGISTRATION AUTHORITY (NIRA) RESPONDENTS

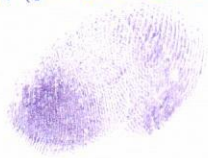
AFFIDAVIT IN SUPPORT

I **AUME KETULA**, of c/o ALP Advocates, Lotis Towers, 5th Floor, Plot 16 Mackinnon Road, P.O. Box 28611 Kampala, do solemnly swear and state on oath that;

1. THAT I am a female adult Ugandan of sound mind, a resident of Mundaa 'B' village, Dabani Sub-county, Busia District, unemployed and swear this affidavit in that capacity.
2. THAT I am **84 years** old born on 9th June 1938, and eligible for enrollment for the Social Assistance Grant for Empowerment (SAGE) Programme as a citizen of Uganda.
3. THAT I got to know about the SAGE Programme in my district about three years ago through the Local Chairperson 1 of my village, who informed us that the government will be paying elderly persons over 80 years old monthly.
4. THAT I was told to add my name on a list of beneficiaries with my National Identity card details. I have never been issued a national Identity card because at the time of mass registration I was hospitalized at Dabani hospital. Then at the time of the second mass registration, I did not learn about the process from my Local Council Chairperson.
5. THAT, later in 2021, I registered under the Application for Registration and National Identification Card - Application ID No. 11438500038WU, and photographs taken for a National Identity card but I have never received the National Identity card nor a national identification number.
6. THAT I went to Busia headquarters for inquiries but the officers on duty did not find my information in the system when they checked.
7. THAT the distance from my home to the place of National Identification registration is very long of about 4 Kilometers which costs around four thousand shillings via boda boda, I cannot transport to the place due to old age.
8. THAT whatever is stated hereinabove is true and correct to the best of my knowledge.

SWORN at Busia District this 15th day of March 2022.

By the said **Aume Ketula**.



DEPONENT

SWORN at Busia this 15th Day of March 2022, before me, and I certify that this affidavit was read over in my presence to the deponent **Aume Ketula**, being illiterate and the contents of the exhibits referred to in this affidavit explained to **Aume Ketula** in the Samia language. The deponent appeared perfectly to understand the same and made their mark thereto in my presence.

SANYA BRIMAYI

0789 39 86 41

BEFORE ME

KHARURI ANNET GYABI
ADVOCATE AND

COMMISSIONER FOR OATHS

A COMMISSIONER FOR OATHS

Drawn and Filed by:

M/s ALP Advocates,
Lotis Towers, 5th Floor,
Plot 16 Mackinnon Road, Nakasero,
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2. **THE UNWANTED WITNESS (U) LIMITED**
3. **HEALTH EQUITY AND POLICY INITIATIVE LIMITED**

VERSUS

1. **THE ATTORNEY GENERAL**
2. **NATIONAL IDENTIFICATION REGISTRATION AUTHORITY (NIRA)** **RESPONDENTS**

AFFIDAVIT IN SUPPORT

I **NAFULA JESCA**, of c/o ALP Advocates, Lotis Towers, 5th Floor, Plot 16 Mackinnon Road, P.O. Box 28611 Kampala, do solemnly swear and state on oath as hereunder;


1. That I am a female adult Ugandan of sound mind, a resident of Munda 'A' village, Nangwe Parish, Dabani Sub-county, Busia District, unemployed and swear this affidavit in that capacity.
2. That I am **82 years** old born on **21st December 1940** and eligible for enrollment for the Social Assistance Grant for Empowerment (SAGE) Programme as a citizen of Uganda.
3. That I got to know about the SAGE Programme about 8 years back through the Local Chairperson 1 of my village- Manda 'A', who informed us that the government will be paying old people monthly. The Local Chairperson first informed us that the program would benefit elderly persons aged 65 years but sadly Busia district was not eligible.
4. That, years after, my Local Chairperson informed me at Busia was now considered for SAGE and only elderly persons aged 80 years and above would benefit.
5. That I was told to add my name on a list with my National Identity card details which I did, but on the day of receiving the money, my name was not on the list, and missed getting paid.
6. That I registered for a National Identity card but it came back with errors. My date of birth was erroneously entered as **08.05.1947** instead of **21.12.1940** as it reads on my voters national Id issued 10th September 2004.
7. That I tried to engage the NIRA officials at Dabani sub-county and I was told to inquire from the district headquarters, where I have been twice but the errors have never been corrected.
8. That the distance from my home to Busia headquarters is very long of about 4 Kilometers, I cannot do regular follow ups due to old age and muscle leg cramps.
9. That my friends in the same age bracket staying in the same village are enjoying the money from the SAGE Programme and I feel left out and discriminated against since my age on the National Identity card was wrongly captured.
10. That whatever is stated hereinabove is true and correct to the best of my knowledge.

SWORN at Busia this 1st day of March 2022.

By the said **NAFULA JESCA**.

DEPONENT

SWORN at Busia this 1st Day of March 2022, before me, and I certify that this affidavit was read over in my presence to the deponent **NAFULA JESCA** being illiterate and the contents of the exhibits referred to in this affidavit explained to **NAFULA JESCA** in the Samia language. The deponent appeared perfectly to understand the same and made their mark thereto in my presence.

QJAMBO RASHID OLUWANDU  - 078266214

BEFORE ME

KHARURI ANNET GYABI
ADVOCATE AND
COMMISSIONER FOR OATHS

A COMMISSIONER FOR OATHS

Drawn and Filed by:

M/s ALP Advocates,
Lotis Towers, 5th Floor,
Plot 16 Mackinnon Road, Nakasero,
P.O Box 28611
Kampala, Uganda.
Email: Info@alp-ea.com

THE REPUBLIC OF UGANDA
IN THE HIGH COURT OF UGANDA AT KAMPALA
(CIVIL DIVISION)

MISCELLANEOUS CAUSE NO. _____ OF 2022

1. INITIATIVE FOR SOCIAL AND ECONOMIC RIGHTS (ISER) LTD APPLICANTS
 2. THE UNWANTED WITNESS (U) LIMITED
 3. HEALTH EQUITY AND POLICY INITIATIVE LIMITED
- VERSUS

1. THE ATTORNEY GENERAL
2. NATIONAL IDENTIFICATION REGISTRATION AUTHORITY (NIRA) RESPONDENTS

AFFIDAVIT IN SUPPORT

I **AJAMBO BULUMA**, of c/o ALP Advocates, Lotis Towers, 5th Floor, Plot 16 Mackinnon Road, P.O. Box 28611 Kampala, do solemnly swear and state on oath as hereunder;

1. That I am a female adult Ugandan of sound mind, a resident of Munda 'A' village, Dabani Sub-county, Busia District, unemployed and swear this affidavit in that capacity.
2. That I am 89 years old and eligible for enrollment for the Social Assistance Grant for Empowerment (SAGE) Programme as a citizen of Uganda.
3. That I got to know about the SAGE Programme in my district about three years ago through the Local Chairperson 1 of my village, who informed us that the government will be paying elderly persons over 80 years old monthly.
4. That I was told to add my name on a list of beneficiaries with my National Identity card details but I have never been issued with a national identity card.
5. That, on **14 July 2014**, I registered for a National Identity card at Busia headquarters on the NSIS – Mass Enrollment Form Bar Code No. HIU5GAE, but my photograph was not taken by the NIRA officer who informed me that he had closed for the day. I was advised by him to return the following day and have my photograph taken. This was frustrating and tiring having spent the whole day at the registration center.
6. That, I also missed registration at the time of mass registration at Busia headquarters because I was ill and unable to travel to the registration center.
7. That the distance from my home to the place of National Identification registration is very long of about 4 Kilometers which costs around four thousand shillings via boda boda, I cannot transport to the place due to old age and high cost of transport.
8. That whatever is stated hereinabove is true and correct to the best of my knowledge.

SWORN at Busia this 12th day of March 2022.

By the said **AJAMBO BULUMA**.

DEPONENT

SWORN at Busia this 12th Day of March 2022, before me, and I certify that this affidavit was read over in my presence to the deponent **AJAMBO BULUMA**, being illiterate and the contents of the exhibits referred to in this affidavit explained to **AJAMBO BULUMA** in the Samia language. The deponent appeared perfectly to understand the same and made their mark thereto in my presence.

Rev. Esau Wandera Wandera 0772938822/0702128217

BEFORE ME

KHARURI ANNET GYABI
ADVOCATE AND

Kharuri **COMMISSIONER FOR OATHS**

A COMMISSIONER FOR OATHS

Drawn and Filed by:

M/s ALP Advocates,
Lotis Towers, 5th Floor,
Plot 16 Mackinnon Road, Nakasero,
P.O Box 28611
Kampala, Uganda.
Email: Info@alp-ea.com

THE REPUBLIC OF UGANDA
IN THE HIGH COURT OF UGANDA AT KAMPALA
(CIVIL DIVISION)

MISCELLANEOUS CAUSE NO. _____ OF 2022

1. **INITIATIVE FOR SOCIAL AND ECONOMIC RIGHTS (ISER) LTD** **APPLICANTS**
2. **THE UNWANTED WITNESS (U) LIMITED**
3. **HEALTH EQUITY AND POLICY INITIATIVE LIMITED**
VERSUS

1. **THE ATTORNEY GENERAL**
2. **NATIONAL IDENTIFICATION REGISTRATION AUTHORITY (NIRA)** **RESPONDENTS**

AFFIDAVIT IN SUPPORT


I **ANYANGO MALISELA**, of c/o ALP Advocates, Lotis Towers, 5th Floor, Plot 16 Mackinnon Road, P.O. Box 28611 Kampala, do solemnly swear and state on oath as hereunder;

1. That I am a female adult Ugandan of sound mind, a resident of Mundaa 'B' village, Dabani Sub-county, Busia District, unemployed and therefore competent to swear this affidavit.
2. That I am **83 years** old, born on **1st January 1939**, and eligible for enrollment for the Social Assistance Grant for Empowerment (SAGE) Programme as a citizen of Uganda.
3. That I got to know about the SAGE Programme in my district about three years ago through the Local Chairperson 1 of my village, who informed us that the government will be paying elderly persons over 80 years old monthly.
4. That I was told to add my name on a list of beneficiaries with my National Identity card details. I did not have a national Identity card then because at the time of mass registration I was sick.
5. That, later in 2021, I registered for a National Identity card under **Application ID No. 11438500038vW** but I have never received the National Identity card nor a national identification number.
6. That the distance from my home to the place of National Identification registration is very long of about 4 Kilometers which costs around four thousand shillings via boda boda, I cannot transport to the place due to old age.
7. That whatever is stated hereinabove is true and correct to the best of my knowledge.

SWORN at Busia this 18th day of March 2022.


By the said **ANYANGO MALISELLA**.

DEPONENT

SWORN at Busia this 18th Day of March 2022, before me, and I certify that this affidavit was read over in my presence to the deponent **ANYANGO MALISELLA**, being illiterate and the contents of the exhibits referred to in this affidavit explained to **ANYANGO MALISELLA** in the Samia language. The deponent appeared perfectly to understand the same and made their mark thereto in my presence. OWDA SAMUEL M. 0779768153 

BEFORE ME

KHARURI ANNET GYABI
ADVOCATE AND

 **COMMISSIONER FOR OATHS**

A COMMISSIONER FOR OATHS

Drawn and Filed by:

M/s ALP Advocates,
Lotis Towers, 5th Floor,
Plot 16 Mackinnon Road, Nakasero,
P.O Box 28611
Kampala, Uganda.
Email: Info@alp-ea.com

THE REPUBLIC OF UGANDA
IN THE HIGH COURT OF UGANDA AT KAMPALA
(CIVIL DIVISION)

MISCELLANEOUS CAUSE NO. _____ OF 2022

- 1. INITIATIVE FOR SOCIAL AND ECONOMIC RIGHTS (ISER) LTD** **APPLICANTS**
- 2. THE UNWANTED WITNESS (U) LIMITED**
- 3. HEALTH EQUITY AND POLICY INITIATIVE LIMITED**
- VERSUS**
- 1. THE ATTORNEY GENERAL**
- 2. NATIONAL IDENTIFICATION REGISTRATION AUTHORITY (NIRA)** **RESPONDENTS**

AFFIDAVIT IN SUPPORT

INANSUBUGA ZUELANCE, of c/o ALP Advocates, Lotis Towers, 5th Floor, Plot 16 Mackinnon Road, P.O. Box 28611 Kampala, do solemnly swear and state on oath as hereunder;

1. That I am a female adult Ugandan of sound mind, a resident of Mafumbe village, Kitimbwa Town Council Sub-county, Kayunga District, unemployed and swear this affidavit in that capacity.
2. That I am **93 years old** born on **2nd May 1929**, holder of a **National ID No. CF2904710E0DND** and eligible for enrollment for the Social Assistance Grant for Empowerment (SAGE) Programme as a citizen of Uganda.
3. That I got to know about the SAGE Programme over the radio and community mega phone. I have also seen my fellow elderly in close neighborhood people receive money at Kitimbwa Town Council.
4. That my name has never appeared on the list of beneficiary and officials from the Kitimbwa Town Council took my photograph and information on the national identity card. Every time the issue money, my name is never on the list and I do not know why.
5. That the distance from my home to Kitimbwa Town Council costs about 2000 Uganda Shillings only yet I can not afford it.
6. That whatever is stated hereinabove is true and correct to the best of my knowledge.

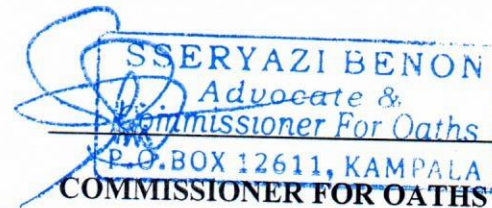
SWORN at Kayunga this 14^m day
of March 2022, by the said NANSUBUGA ZEULENCE .



DEPONENT

BEFORE ME:

SWORN at Kayunga this 17^m day of
March 2022, before me, and I certify that this affidavit was read over in
my presence to the deponent she being illiterate and the nature and contents of the exhibits
referred to in the affidavit explained to her in the Luganda language. The deponent appeared
perfectly to understand the same and made her mark/signature thereto in my presence.



Drawn and filed by:

ALP Advocates
Lotis Tower, 5th floor
Plot No. 16 Mackinnon Road
P.O.Box 28611
Kampala, Uganda.
Tel: +256414671997
Email: info@alp-ea.com

THE REPUBLIC OF UGANDA
IN THE HIGH COURT OF UGANDA AT KAMPALA
(CIVIL DIVISION)

MISCELLANEOUS CAUSE NO. _____ OF 2022

1. INITIATIVE FOR SOCIAL AND ECONOMIC RIGHTS (ISER) LTD **APPLICANTS**
2. THE UNWANTED WITNESS (U) LIMITED
3. HEALTH EQUITY AND POLICY INITIATIVE LIMITED
VERSUS

1. THE ATTORNEY GENERAL
2. NATIONAL IDENTIFICATION REGISTRATION RESPONDENTS
AUTHORITY (NIRA)

AFFIDAVIT IN SUPPORT

I **NAKAGIRI NAKATO**, of c/o ALP Advocates, Lotis Towers, 5th Floor, Plot 16 Mackinnon Road, P.O. Box 28611 Kampala, do solemnly swear and state on oath as hereunder;

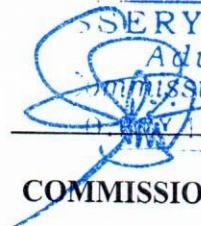
1. That I am a female adult Ugandan of sound mind, a resident of Bwamilamila Obwa Mayanja village, Kitimbwa Sub-county, Kayunga District, unemployed and swear this affidavit in that capacity.
2. That I am **81 years** old born in **October 1940** and eligible for enrollment for the Social Assistance Grant for Empowerment (SAGE) Programme as a citizen of Uganda.
3. That I got to know about the SAGE Programme over the radio and community mega phone.
4. That I learnt about the mass registration of the national identity card about two years ago from the community mega phone at Misanga Village, Bbale Town Council- Kayunga District at the time I was taking care of my brother. Unfortunately, I also fell ill shortly after and missed out on the registration.
5. That I have never been told of any other information for registration.
6. That it costs me about 7000 Uganda shillings to get to the Town Council for any follow ups an amount that I cannot afford.
7. That whatever is stated hereinabove is true and correct to the best of my knowledge.

SWORN at Kayunga this 18th day
of March 2022, by the said NAKAGIRI NAKATO.


R
H
/ of NAKAGIRI NAKATO
DEPONENT

BEFORE ME:

SWORN at Kayunga this 18th day of
MARCH 2022, before me, and I certify that this affidavit was read over in
my presence to the deponent she being illiterate and the nature and contents of the exhibits
referred to in the affidavit explained to her in the Luganda language. The deponent appeared
perfectly to understand the same and made her mark/signature thereto in my presence.


SERYAZI BENON
Advocate &
Commissioner For Oaths
P.O. Box 28611, KAMPALA
COMMISSIONER FOR OATHS

Drawn and filed by:

ALP Advocates
Lotis Tower, 5th floor
Plot No. 16 Mackinnon Road
P.O.Box 28611
Kampala, Uganda.
Tel: +256414671997
Email: info@alp-ea.com

THE REPUBLIC OF UGANDA
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MISCELLANEOUS CAUSE NO. _____ OF 2022

- 1. INITIATIVE FOR SOCIAL AND ECONOMIC RIGHTS (ISER) LTD APPLICANTS
 - 2. THE UNWANTED WITNESS (U) LIMITED
 - 3. HEALTH EQUITY AND POLICY INITIATIVE LIMITED
- VERSUS**

- 1. THE ATTORNEY GENERAL
- 2. NATIONAL IDENTIFICATION REGISTRATION AUTHORITY (NIRA) RESPONDENTS

AFFIDAVIT IN SUPPORT

I **NAFULA HENDERIKA**, of c/o ALP Advocates, Lotis Towers, 5th Floor, Plot 16 Mackinnon Road, P.O. Box 28611 Kampala, do solemnly swear and state on oath as hereunder;

- 1. That I am a female adult Ugandan of sound mind, a resident of Nasuma 'B' village, Buswale Sub-county, Namayingo District and swear this affidavit in that capacity.
- 2. That I am physically disabled.
- 3. That I am 83 years old and eligible for enrollment for the Social Assistance Grant for Empowerment (SAGE) Programme as a citizen of Uganda.
- 4. That I got to know about the SAGE Programme from John Mbuga Local Chairperson then and I was registered using my voter's ID but I have never received any money. To-date, I do not know the amount given out because I have never received any money.
- 5. That no one ever shared any updates nor informed me about re-registering at the time of mass registration for the national identity card.
- 6. That I know one other elderly person in my Nasuma 'B' village that receives SAGE grants.
- 7. That whatever is stated hereinabove is true and correct to the best of my knowledge.


SWORN at Namayingo this 21st day
of March 2022, by the said NAFULA HENDRIKA.



DEPONENT

BEFORE ME:

SWORN at Namayingo this 21st day of
March 2022, before me, and I certify that this affidavit was read over in
my presence to the deponent she being illiterate and the nature and contents of the exhibits
referred to in the affidavit explained to her in the Lusoga
language. The deponent appeared perfectly to understand the same and made her
mark/signature thereto in my presence.



COMMISSIONER FOR OATHS
Nkuuti shaban
Commissioner for
oaths

Drawn and filed by:

ALP Advocates

Lotis Tower, 5th floor

Plot No. 16 Mackinnon Road

P.O.Box 28611

Kampala, Uganda.

Tel: +256414671997

Email: info@alp-ea.com