

Deadly Profits

Illegal Wildlife Trafficking through
Uganda and South Sudan

By Ledio Cakaj and Sasha Lezhnev
July 2017





Cover: The carcass of an elephant killed by militarized poachers.
Garamba National Park, DRC, April 2016. Photo: African Parks

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Executive Summary

Countries that act as transit hubs for international wildlife trafficking are a critical, highly profitable part of the illegal wildlife smuggling supply chain, but are frequently overlooked. While considerable attention is paid to stopping illegal poaching at the chain's origins in national parks and changing end-user demand (e.g., in China), countries that act as midpoints in the supply chain are critical to stopping global wildlife trafficking. They are needed way stations for traffickers who generate considerable profits, thereby driving the market for poaching. This is starting to change, as U.S., European, and some African policymakers increasingly recognize the problem, but more is needed to combat these key trafficking hubs.

In East and Central Africa, South Sudan and Uganda act as critical waypoints for elephant tusks, pangolin scales, hippo teeth, and other wildlife, as field research done for this report reveals. Kenya and Tanzania are also key hubs but have received more attention. The wildlife going through Uganda and South Sudan is largely illegally poached at alarming rates from Garamba National Park in the Democratic Republic of Congo, South Sudan, points in West Africa, and to a lesser extent Uganda, as it makes its way mainly to East Asia. Worryingly, the elephant population in Congo has decreased by an estimated 75 percent since 1996 mainly due to poaching, according to park officials in Congo.¹ Since conflict broke out in South Sudan in December 2013, South Sudanese poachers and armed groups have increasingly crossed into Garamba park in Congo, for example, through the little monitored Lantoto National Park in South Sudan, and likely now make up the majority of poachers there, according to park officials and United Nations experts.² Joseph Kony's Lord's Resistance Army (LRA), armed Sudanese poachers, and Mbororo pastoralists in Congo also continue to poach in Garamba.³

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South Sudanese poachers in Congo appear to be a mix of soldiers, former soldiers, police officers, and civilians, based on Enough Project field interviews. They traffic ivory and other wildlife to foreign markets via smuggling routes, mainly through South Sudan, particularly Juba International Airport and/or by road through neighboring Uganda, an important transit point for trafficked animals and ivory tusks originating from Congo and South Sudan. Insecurity in South Sudan has helped create an ivory trafficking route from the southwest of South Sudan eastward to Juba. From there, it is either flown out of the country via Juba Airport or driven south to Uganda via the border crossings at Nimule or Oraba.⁴ Over five tons of ivory was seized at Juba's airport in 2014-15 alone.⁵

Based on estimates from seizures in Uganda and interviews with experts in Congo, South Sudan, and Uganda, large amounts of ivory from Garamba are transported to Uganda either through South Sudan or via Congo-Uganda border crossings.⁶ Elephant ivory fetches up to \$250 per kilogram (\$113 per pound) in



Despite new reforms, Uganda continues to be used as a wildlife trafficking hub. One ton of ivory was seized at Entebbe airport from alleged smugglers from West Africa in February 2017. Photo: Natural Resources Conservation Network/EAGLE.

the Ugandan black market, a significant amount of money locally.⁷ The wildlife is then trafficked to either Entebbe International Airport or the border crossings between Uganda and Kenya and to the Kenyan port of Mombasa, which is another exit point of illicit goods destined for Asian markets, or to the port of Dar es Salaam, Tanzania.⁸

International authorities increasingly recognize Uganda as a wildlife trafficking hub. Although the Ugandan government has taken several key anti-poaching and trafficking steps within the last year, much remains to be done to combat trafficking. Uganda was listed as one of ten countries worldwide “linked to the greatest illegal ivory trade flows since 2012,”⁹ including those from Central Africa, according to the global body that tracks poaching and trafficking, the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). Trafficking through Uganda appeared to worsen with CITES listing it for the first time in 2013 as a country of “primary concern.”¹⁰

The Ugandan government has recently taken important measures to address the problem. Recent efforts include setting up a court dedicated to wildlife crimes, ordering investigations into the leadership of the Uganda Wildlife

Authority (UWA) for the alleged theft of ivory from its storerooms and other alleged offenses, completing the review of the 20-year-old Uganda Wildlife Act that will now be sent to the Parliament of Uganda, beefing up penalties for poaching and trafficking, and increasing the number of wildlife seizures, arrests, and prosecutions in recent years. However, organized criminal groups are likely still involved in trafficking in Uganda.¹¹ International traffickers continue to use Uganda as a waypoint, as evidenced by the February 2017 seizure of over one ton of ivory suspected to be from neighboring countries and the arrest of three West Africans near Kampala.¹² Also, UWA officials are accused of attempted bribery of banks, which UWA

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denies.¹³ And while a new court dedicated to wildlife prosecutions is an important step, there is only one such court in the country, and prosecutions of high-level traffickers have been limited to date. One problem has been the storage of seized wildlife and the subsequent trafficking of it. For example, in October 2014 an internal audit of the Uganda Wildlife Authority's stock room found that 1.35 metric tons of elephant ivory had gone missing from 2009 to 2014.¹⁴

Furthermore, there have also been several cases of state-affiliated actors involved in wildlife trafficking in Uganda and South Sudan. Some of these cases have been prosecuted, e.g., a February 2017 conviction of mid-level Ugandan army officers for ivory trafficking. However, several cases have either not been prosecuted or have lingered in the Ugandan court system for years, and there have been no convictions to date for the missing 1.35 tons of ivory first reported three years ago. In South Sudan and Uganda, there has been little accountability to date for high-level cases of officials involved in trafficking. In some cases, in South Sudan, traffickers were released or never charged. In addition, storerooms in Uganda for wildlife artifacts confiscated from smugglers appear, in some instances, to be sources for further black-market trade.

Understanding and combating trafficking in South Sudan and Uganda should be of primary importance to policymakers aiming to curb the frenzied levels of poaching in one of Central Africa's remaining sanctuaries for wildlife, Garamba National Park. To this end, the following authorities and offices should fully consider and implement wherever possible the recommendations as follows:

Recommendations

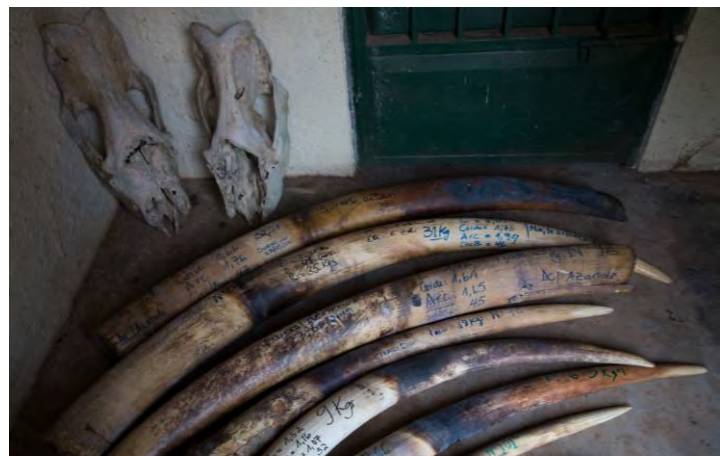
1. **Increase accountability.** The United States and European nations should urge the Ugandan government to follow up on high-level cases of wildlife trafficking in Uganda's military, anti-corruption, or wildlife courts, as well as cases in South Sudanese courts, to help ensure that the cases move forward in their respective justice systems. U.S. Agency for International Development (USAID), the United Kingdom's Department for International Development (DFID), Denmark's Danida, and other donors should provide assistance to the Ugandan Ministry of Justice to expand the wildlife court and train judges in wildlife crimes. Training should include how to properly value wildlife, such that judicial sentences are appropriate to the scope of crimes committed.
2. **Combat poaching in and around Garamba.** With U.S. Congressional support, the U.S. Department of Defense should authorize funding to support Garamba National Park rangers and African Parks (the NGO which manages the park) to help interdict the illegal poaching and wildlife trade from Congo to South Sudan and Sudan. For example, with additional funding, AFRICOM could help provide technology to augment park rangers' interdiction capability, such as night vision, thermal recognition, camera traps, and night-flying panels for helicopters over Garamba park. European military personnel and contractors, MONUSCO, and the U.S. Fish and Wildlife Service could also provide assistance. MONUSCO peacekeepers could also, in collaboration with FARDC military or Congolese police, conduct 'stop and search' operations of trucks suspected of transporting ivory by road.

3. **Follow the money.** Justice authorities in the European Union, the United States, Uganda, and elsewhere with jurisdiction over individuals and companies suspected of high-level involvement in illegal ivory trafficking should investigate the most serious cases of trafficking, money laundering, and other related crimes. Financial intelligence units in the United States and Europe, banks, and other financial institutions should build on the study produced in mid-2016 by the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG)¹⁵ to combat the laundering of the proceeds of trafficking through the international financial system. Sanctions authorities such as the U.S. Department of Treasury’s Office of Foreign Assets Control (OFAC) should pursue and designate key traffickers and their criminal networks.
4. **Maintain wildlife stocks.** The U.S. Fish and Wildlife Service and European states should provide technical assistance to the Uganda Wildlife Authority (UWA) to ensure that wildlife stocks are kept safely in one or two depots, under the sole control and responsibility of UWA executives.
5. **Pass legislation with harsher penalties.** The Parliament of Uganda should pass the revised Wildlife Act, which includes stiffer penalties for wildlife trafficking, that the Ugandan cabinet has now finished reviewing.
6. **Support local anti-trafficking groups.** International donors and conservation authorities should increase support to local organizations in Congo, South Sudan, and Uganda that carry out investigations of wildlife trafficking. Public-private partnerships may be applicable here.

South Sudanese Armed Poachers in Congo’s Garamba Park—“the biggest threat”

The United Nations Office on Drugs and Crime World Wildlife Crime Report of 2016 stated that, “Corruption, rather than conflict, is the primary enabler of elephant poaching.”¹⁶ While armed conflict in South Sudan and the Democratic Republic of Congo are important drivers of poaching and the pursuant trafficking, corruption in neighboring states, such as Uganda, is indeed a driver that has received far less attention.

Just over the border from South Sudan in northeast Congo, there is a large contingent of poachers of elephants, pangolins, and other animals in and around Garamba Park. This contingent includes armed groups, corrupt military units, and individuals living around the park. As documented in the 2015 Enough Project report, “Tusk Wars,” the Lord’s Resistance Army (LRA) is one such group that has poached elephants for their tusks in recent years.¹⁷ There are also other important armed actors involved in poaching in and around Garamba.¹⁸ Another group is made



Some of 113 elephant tusks recovered by wildlife rangers in Garamba National Park in the northern Democratic Republic of Congo, November 18, 2015. Photo: African Parks/Jerome Starkey.

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up of Sudanese poachers, who are as dangerous, if not better trained and armed, than LRA fighters. But park officials believe that South Sudanese poachers now carry out a majority of the poaching in Garamba. As the U.N. Group of Experts on the DRC noted in 2016:

The [Garamba] Park authorities consider one of the greatest threats to be groups of armed poachers from South Sudan. While South Sudanese military and police uniforms have been retrieved following clashes with poachers, it remains unclear whether these belonged to regular SPLA or South Sudanese police units, or deserters, or had simply been acquired as easily obtainable clothing. Given the flux in authority across the border and the wide availability of weapons, it is likely that this will remain a very significant threat to the Park's elephant population.¹⁹

Data on poaching in this area is incomplete and must be taken with approximation. A U.N. research study estimated that roughly 500 elephants were killed in Garamba National Park between 2012 and 2015.²⁰ Park officials believe the majority of elephant killings in Garamba were done by armed actors other than the LRA, although U.N. researchers also note that the LRA often does not take credit for its poaching attacks, so they may be responsible for a higher percentage.²¹

Indeed, as the conflict in South Sudan drags on, there is evidence the nation is becoming an increasing center for animal poaching and wildlife trafficking. In South Sudan, authorities estimate more than 500 elephants have been poached since the current conflict began in December 2013.²² Other reports are more dire, suggesting the South Sudanese elephant population has been cut in half in three years, from 5,000 to less than 2,500.²³ The country's parks, game reserves, and migration routes are the scenes of

In South Sudan, authorities estimate more than 500 elephants have been poached since the current conflict began in December 2013.

brutal slayings of the creatures, including at least 15 adult elephants killed in January 2016 between Unity and Warrap states²⁴ and 10 elephants, along with zebras and giraffes, poached at Lantoto National Park.²⁵ Park rangers arrested 19 government soldiers at Bandingilo National Park in February 2016 with 21 sacks of bush meat sourced from 62 antelopes.²⁶ Countless other incidents have occurred involving civilians, security forces, and armed groups operating in an environment where people suffer from hunger and law enforcement is impeded from enforcing wildlife protection laws.²⁷

South Sudanese poachers in Garamba Park in Congo appear to be a mix of armed fighters and local poachers. African Parks'

Garamba Park Manager Erik Mararv said in an interview for a March 2016 news article that "the biggest threat to Garamba's elephants was neither LRA rebels, nor Janjaweed horsemen, nor mysterious helicopters, but gangs from South Sudan, some wearing national army uniforms."²⁸ A particularly violent incident on June 27, 2015, which led to the killing of two Garamba park rangers and one Congolese soldier, might have also been carried out by a well-organized group of South Sudanese soldiers.²⁹ Park officials also say South Sudanese militias have been responsible for poaching.³⁰ A group of South Sudanese "Arrow Boys," a local militia that operated in Mundri, South Sudan, were likely involved in some cases of poaching in Garamba as well as in Lantoto Park in South Sudan.³¹

According to the U.N. Group of Experts on the DRC:

...[P]oachers from South Sudan can easily enter the Democratic Republic of the Congo illegally through the Lantoto National Park, a prolongation of the Garamba savannah in South Sudan, which is not patrolled by South Sudanese forces. The last of a series of clashes between Ouda poachers and FARDC and rangers was reported as recently as 2 October 2016 in the Azande hunting range. In addition, in August 2016, 900 armed elements from SPLM/A in Opposition crossed this border without meeting any resistance. The elements from SPLM/A in Opposition interviewed by the Group confirmed that they had travelled as far as 150 km south of the border before encountering park rangers.³²

International conservation experts and South Sudanese park officials interviewed by Enough in Yambio, James Diko, and Juba, South Sudan, spoke about the participation of South Sudanese security forces poaching in Garamba Park, a practice that has a long history.³³ The Garamba Park head ranger described how a common practice particularly taking place in 2014 and 2015 involved Sudan People's Liberation Army (SPLA) soldiers attacking park rangers in order to intimidate them and allow civilian poachers to chase the animals unhindered.³⁴

While most of the wildlife is poached and trafficked for profit out of East and Central Africa, interviews with wildlife officials indicate that at least some South Sudanese poaching in Garamba is focused on finding bush meat.³⁵ A wildlife ranger in Yambio, South Sudan, said that security forces in civilian garb are known to frequently hunt wild animals in Garamba. "The current civil war has left everyone to do anything for survival, people have not received their cash for months and some of the soldiers go hunting animals for survival, but not in uniform."³⁶

Wildlife Trafficking Routes Through South Sudan

Based on estimates from seizures and interviews with experts in DRC, South Sudan, and Uganda, large amounts of ivory—possibly hundreds of tons annually—from Garamba are transported through South Sudan and Uganda.³⁷ Elephant tusks, rhino horns, pangolin scales, hippo teeth, and various other wild animal by-products are smuggled from Uganda to Arab and Asian markets, out of the Entebbe International Airport and the border crossing between Uganda and Kenya to the Kenyan port of Mombasa, another exit point of illicit goods destined for Asian markets.³⁸

Juba International Airport

Insecurity and increased external demand for ivory have created an ivory trafficking route from the southwest of South Sudan eastward to Juba, where it is either flown out of the country via Juba International Airport, or driven south to Uganda via the border crossing at Nimule.³⁹ Both Enough Project research and wildlife officials in South Sudan have analyzed these two routes.⁴⁰ Specifically for ivory tusks from Congo, the U.N. Group of Experts on Congo in December 2016 noted that "SPLM/A in Opposition combatants and other sources familiar with the ivory trade told the Group that one route for ivory from the national park was through Juba."⁴¹

In 2014-15, South Sudanese authorities confiscated more than five tons of ivory at Juba International Airport.⁴² Today, the Juba airport remains an exit point for wildlife, including elephant ivory and pangolins. Security officials and others have been involved in smuggling there.⁴³ There were three wildlife seizures in a three-week period in mid-2016 alone at Juba airport. For example, on May 24, 2016, an SPLA major was caught trying to smuggle 16 elephant tusks cut into smaller pieces, in a cargo plane destined for Paloich, Upper Nile, the country's only functioning oil fields. The ivory was destined for Sudan, likely via the border town of Renk.⁴⁴ A day later, on May 25, 2016, sniffer dogs at Juba Airport discovered 10 kilograms (more than 20 pounds) of frozen pangolin meat, reportedly belonging to a Chinese national working in the oil fields of Paloich.⁴⁵ The suspected smuggler, a Chinese oil engineer, was released shortly after his arrest, together with the pangolin meat.⁴⁶ Similarly, the SPLA major was also freed without charges or explanation.⁴⁷ This again highlights the problems of army involvement in wildlife trafficking and the impunity for smugglers in South Sudan.

Another major smuggling incident just three weeks later is an example of the broader pattern at Juba Airport. On June 17, 2016, authorities at the airport seized a very large amount of ivory, 1.2 tons in 25 crates.⁴⁸ At least two people, identified as Ugandan and South Sudanese, were arrested on suspicion of smuggling. The ivory arrived in an Ethiopian Airlines cargo plane from Entebbe, Uganda, and was scheduled to then go to Cairo and on to Malaysia with EgyptAir.⁴⁹ According to conservation groups, the Ugandan suspect was released soon thereafter without explanation.⁵⁰ This case is indicative of the extensive networks of traffickers and the lengths to which they will go to smuggle wildlife. The ivory had been flown from Entebbe to Juba in an international commercial airliner and at least half of the declared stock went missing, possibly surreptitiously already en route, or already at its destination. According to wildlife conservation sources, the ivory was part of old stocks from Burundi's depots, confiscated over the years from poachers killing elephants in Tanzania.⁵¹ Months later, in December 2016, South Sudanese authorities and their dogs detected 500 kilograms (1,100 pounds) of ivory on a flight arriving from Addis Ababa.⁵² They arrested three people. The ivory, allegedly wrapped in clothes, was again reportedly bound for Cairo and eventually Asia.

From South Sudan to Uganda by road: border crossings and army trucks

Illegally trafficked wildlife is also smuggled out of South Sudan and into Uganda by road. Both international and national conservation experts in South Sudan and Uganda claimed that ivory, pangolin scales, and rhino horns enter Uganda from formal and informal border crossings with Congo and at least two major formal border crossings with South Sudan at Oraba and Nimule.⁵³ The Nimule border crossing connects Uganda's Acholi sub-region with South Sudan's Central Equatoria State, including the capital Juba.⁵⁴ One Ugandan source claimed to the Enough Project that he was driven to Nimule in 2015 on a Ugandan army truck to view ivory for sale. The source claimed that the Ugandan officer, a lieutenant colonel, worked alongside an SPLA general selling ivory and other wildlife to Kenyan and Ugandan traffickers.⁵⁵

Another ivory trafficking route appears to pass through the South Sudan-Uganda border crossing at Oraba in the West Nile region. This crossing is frequented by convoys made up of trucks hired by the Ugandan army and other commercial trucks. The trucks travel via the Khaya-Yei-Nzara axis in South Sudan's Western Equatoria. Due to growing insecurity, trucks increasingly use the route that connects Yambio, South Sudan to Arua, Uganda. The trucks, which provide supplies for the Ugandan army personnel in

South Sudan and the Central African Republic, are escorted by Ugandan soldiers. Their presence has provided added security to the Yambio/Nzara–Arua axis, which other drivers also use.⁵⁶ Truck drivers in the region claimed that drivers pay up to \$3,000 per truck to be included in the Ugandan army convoy, which heads northwest from Uganda for South Sudan once a month.⁵⁷

South Sudanese and Ugandan wildlife officials alleged that ivory and other wildlife has been trafficked along these routes, including by the Ugandan army trucks. Enough was not able to independently verify these claims. However, a key point to note is that Ugandan army trucks are not checked as they travel through South Sudan, Uganda, or the border crossing. A South Sudanese wildlife official said, “We have had information that UPDF trucks carry back timber, ivory, and we even heard cases of live chimpanzees, but we cannot check their cars.”⁵⁸ A former Uganda Wildlife Authority (UWA) employee said that in two different instances in 2013 and 2014, UWA had intelligence of wildlife being carried on UPDF trucks coming from South Sudan to Arua and in both cases UWA authorities and the police were not allowed to check the trucks.⁵⁹ For more discussion of the UWA, see page 12.

Separately, a Uganda Revenue Authority official interviewed by Enough claimed that URA employees cannot search army trucks at border crossings, because they would be “disclosing army secrets.”⁶⁰ Given the apparent lack of oversight of cross-border shipments, it would be important for Uganda and South Sudan to allow independent, third-party checking of the trucks. This could potentially discourage an international smuggling route and ensure the military trucks are used for their intended purposes.

Wildlife Smuggling Through Uganda

In recent years, Uganda has become a major transit point in the global illegal ivory trade, according to CITES.⁶¹ Uganda emerged as a wildlife trafficking risk in the CITES rankings in 2013, going from a country of secondary concern for ivory trafficking in 2009 to a country of primary concern in 2013 and remained so in 2016.⁶² CITES noted in 2016 at its major international conference that Uganda was “an important entrepôt/export centre in East Africa with clear links to Central African ivory trade flows.”⁶³ The CITES report stated that since 2013, “organised criminal elements operating in Kenya, Tanzania and Uganda have continued to move large quantities of ivory into, between, and out of these three East African countries, which collectively constitutes the greatest illicit ivory trade flows out of Africa in the period 2009 through 2014.”⁶⁴



63kg (139 lbs) of ivory recovered from a bust in Uganda in February 2017 after the alleged smuggler attempted to bribe police. Photo: Natural Resources Conservation Network/EAGLE.

Corruption is a key driver of trafficking in Uganda and the other East African countries, according to several wildlife trafficking studies cited and synthesized in

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the CITES report, with numerous problems at exit and entry ports, and “corruption ... within government institutions charged with protecting wildlife, and by political and economic elites in these countries, including ivory stock thefts, and various judicial failings such as ordering the release of seized ivory or suspects on bail, or imposing mediocre penalties.”⁶⁵

Uganda has conducted a number of seizures in recent years, indicating that traffickers are actively using the country to smuggle wildlife. There were four major seizures of nearly three tons of elephant ivory and two tons of pangolin scales in 2015, worth roughly \$2 million in total,⁶⁶ an increased number of seizures in 2016, and a seizure of over one ton of ivory in February 2017 already.⁶⁷ In all these cases, no arrests of the actual owners of the cargo were made.⁶⁸ Sources in the region believe that the seizures are likely only

a small amount compared to wildlife that is smuggled out successfully.⁶⁹



Three traffickers were arrested in Uganda with one live pangolin and two skinned pangolins. One of them is a police officer. April 21, 2017. Photo: Natural Resources Conservation Network/EAGLE.

On the judicial side, dozens of arrests of direct wildlife smugglers have been made in connection with seizures.⁷⁰ Until recently, seizures and arrests were rarely accompanied by high-level prosecutions, but this has started to change. In 2016, there were three cases of Ugandan security officials, including army and police officers, caught trying to sell or

buy ivory, in addition to dozens of other cases of Congolese and non-state Ugandan smugglers trafficking wildlife through Uganda. However, these cases did not reach the smuggling networks' kingpins. CITES notes that, “Some progress is being made [in East Africa]... since 2013, Kenya, Tanzania and Uganda seem to have met with greater success in interdicting large-scale movements of ivory prior to export abroad. Moreover, criminal suspects have been arrested in conjunction with some of these seizures. Of note, Chinese nationals have been arrested in all three countries.”⁷¹

Local activists believe some of the change has come because of the greater media attention paid to wildlife trafficking in Uganda, as well as more direct international and embassy support for anti-trafficking efforts. Since a 2014 loss of 1.35 tons of ivory from UWA discussed later in this report, a spate of stories about wildlife trafficking has appeared in Uganda media, including *The New Vision*, *The Monitor*, and other newspapers. One reporter, Gerald Tenywa of *The New Vision*, was nominated for an award by the African Centre for Media Excellence after writing several headline stories on the theft of the UWA ivory.⁷² However, it is noteworthy that Tenywa was threatened after writing the stories, and other reporters have been scared to write stories on trafficking for this reason.⁷³

Until recently, there was little progress in arrests of higher-level traffickers and enforcement of cases involving members of the Ugandan security services. Before 2016, there was little movement in the judicial system of high-profile trafficking cases involving state security personnel, and most were either exonerated or freed on bail. Government officials were arrested, but soon released and not charged. For example, following the 2014 discovery of the large ivory theft from UWA, Executive Director Dr. Andrew Seguya was suspended for two months but was then reinstated, did not face charges, and is still UWA's director.⁷⁴ Prior to his suspension, Seguya wrote an open letter saying he "had instituted the audit team to do regular ivory stockpiling" and that "it was absurd that he was being at the same time accused of stealing ivory."⁷⁵ He was then reinstated because his suspension did not follow the UWA human resource manual.⁷⁶ There were other cases of officers that were not prosecuted, other cases stalled in the court system, and judges were reportedly harassed over wildlife cases.⁷⁷

Another interesting ivory seizure took place on May 17, 2016, when Julius Mugume, a Uganda Special Forces Command officer, was arrested trying to sell ivory in a Kampala suburb, along with a bar manager. Interviews with individuals involved in this case, who did not want to be identified for fear of retaliation by the army, stated that soldiers swiftly took Mugume out of police custody, allegedly to prosecute him in court-martial proceedings, thus barring him from giving any statements.⁷⁸ According to Ugandan anti-wildlife trafficking organization Natural Resource Conservation Network then-spokesman Laban Muhindo, the police later appeared reluctant to expose Mugume, alleging that revealing his identity would jeopardize investigations. Muhindo went on to say that they had experienced such incidents in the past and have received threatening messages from high-ranking security officers. "The biggest foreign exchange earner is tourism yet you don't want people to know those involved in illegal business," Muhindo said.⁷⁹

The sources claimed that Mugume provided security for the alleged seller of ivory and that phone records between Mugume and the middleman, who arranged meetings between buyers and sellers of ivory, indicate that the business had been going on for a while.⁸⁰ In addition, this case led to the capture of

Along with the military, there are also cases of alleged police involvement in ivory smuggling.

another man in possession of a firearm as well as \$40,000 in fake denominations, indicating a connection between ivory smuggling and other nefarious businesses.⁸¹ The weapon allegedly belonged to a Ugandan policeman, also involved in the illegal deals. Both the man with the pistol and the policeman were arrested by the police and taken to an unknown detention facility inaccessible to the public and held.⁸²

Along with the military, there are also cases of alleged police involvement in ivory smuggling. One such case from early 2016 concerned two police officers based in Kampala. According to official records, on January 13, 2016, two men were arrested with 69 kilograms (152 pounds) of ivory that was reportedly part of a larger, hidden consignment of 200 kilograms (441 pounds). In a statement to police, one of the men caught with ivory, Robert Kasita, implicated two police officers. Kasita initially stated that an assistant inspector of police in the Criminal Investigations Department (CID) gave him the ivory to sell.⁸³ Kasita was convicted on February 27, 2017, and sentenced to a fine of 2 million Uganda shillings (about \$560) or one year in jail.⁸⁴

According to a confidential source, who is familiar with the case but refused to be identified because of fear of repercussions from the police, Kasita claimed at first that the CID officer also ordered a police constable to accompany Kasita when selling the ivory, to provide security. Police initially arrested the constable alongside Kasita, but his record was expunged after he was taken to the Central Police Station on Buganda Road, in Kampala.⁸⁵ Furthermore, the CID officer was exonerated while Kasita was awaiting trial as of the time of writing, his case seemingly buried.⁸⁶ Despite Kasita's case implicating a senior CID officer, a government inspector general declined to conduct an independent investigation and instead referred the case to the CID, where it has apparently not moved forward.⁸⁷

One particularly intriguing piece of evidence from Kasita's original statement—later amended after a visit in jail by the CID officer—regards the provenance of ivory, which according to Kasita, was the police headquarters stockrooms.⁸⁸ This would mean that some government officials have reintroduced stocks of wildlife impounded by Ugandan governmental authorities into the black market. Rather than being safe spaces for storing wildlife, such depots become aggregators of large amounts of wildlife, collected from small time poachers and smugglers, and then sold for profits while low-level poachers pay hefty fines or serve jail time.

Judicial reforms

However, Uganda has taken important steps toward ending the impunity of state-affiliated traffickers over the past year. There are signs of meaningful efforts to pursue and crack down on wildlife smuggling with the installation of a dedicated wildlife court in October 2016 and the beginnings of increased convictions in early 2017, which included state officials. First, on March 24, 2016, police forces arrested two Ugandan army soldiers, Maj. Allan Rutagira and Cpl. Collins Kamugisha. Police statements allege the



For years, state-affiliated actors escaped prosecution in Uganda, but with the advent of the new wildlife court in late 2016, this is changing. Here, two army officers and four others were arrested for ivory trafficking in Uganda in March 2016. Photo: Natural Resources Conservation Network/EAGLE.

two men were about to sell 22 kilograms (nearly 50 pounds) of raw elephant ivory when they were arrested.⁸⁹ Rutagira worked for the Ugandan Special Forces Command, temporarily assigned to the Chieftaincy of Military Intelligence (CMI), which is the Ugandan army military intelligence headquarters. Kamugisha was an active Special Forces Command officer.⁹⁰ Subsequent police investigations revealed that Rutagira and Kamugisha allegedly had a larger quantity of ivory hidden.⁹¹ Rutagira and Kamugisha were accused of working with a half-dozen others in a smuggling ring. The two were convicted of illegal possession of

ivory by the new wildlife court on February 21, 2017, and sentenced to a fine of 4 million Ugandan shillings (approximately \$1,100). They are serving a two-year prison sentence in lieu of paying the fine. The court magistrate, Gladys Kamasanyu, stated at their sentencing hearing, “As UPDF soldiers, the convicts were charged with the responsibility of protecting our motherland with all her resources. What they did in trading in ivory was betrayal.”⁹²

In May 2017, Ugandan President Yoweri Museveni ordered a new investigation into the Uganda Wildlife Authority (UWA) and its executive director, Andrew Seguya. This is a potential sign Uganda is turning a page in the wildlife trafficking arena. In his letter⁹³ to the Inspector General of Government, Museveni ordered the IGG to investigate UWA for eight different possible crimes and/or illicit activities, including the loss of wildlife from its storeroom (see page 13), attempted bribery (see endnotes 13 and 110), licensing to sell pangolin scales in contravention of international conventions (see page 14), and other violations.⁹⁴ It should be noted that Seguya survived the initial investigation in 2015 and was never charged. Nevertheless, an investigation ordered by the president himself, combined with the new wildlife court, may mark a policy shift. It will be important to watch what happens with these investigations and if indeed prosecutions and convictions result from them.

The loss of elephant ivory from the stockroom of Uganda Wildlife Authority (UWA) in 2014, which is described below, is a good example of how some government officials have allegedly facilitated, rather than fought, the trafficking of wildlife.

Uganda Wildlife Authority: Smuggling and Storerooms

There have been several instances of alleged wildlife trafficking involving ivory and rhino horn storerooms, the employees who work there, and military officers associated with the Uganda Wildlife Authority (UWA). Four of these cases are now being prosecuted in the Ugandan court system. UWA, whose motto is “conserving for generations,” is “a semi-autonomous government agency that conserves and manages Uganda’s wildlife for the people of Uganda and the whole world.”⁹⁵ UWA deploys rangers to Uganda’s national parks and manages wildlife tourism, including issuing permits to view mountain gorillas in Bwindi and Mgahinga national parks. UWA is also responsible, in tandem with the Ministry of Tourism, for issuing hunting and breeding permits for various animal species.

UWA also manages anti-wildlife trafficking programs. It set up a law enforcement intelligence unit—where informers pose as wildlife buyers—comprised of rangers and army personnel, and a legal office in charge of prosecuting cases of poaching and trafficking.⁹⁶ The Ugandan army controls law enforcement within UWA. Initially a civilian position, the UWA head of law enforcement was taken over by the Ugandan army at the rank of colonel, who then added a deputy position at the rank of major.⁹⁷

UWA law enforcement is linked to smuggling cases. According to an internal UWA investigative report from September 2014, two UWA informants—civilians used by UWA to gather evidence on wildlife smugglers—were involved in selling stolen elephant and rhino ivory while on UWA’s payroll.⁹⁸ The investigation alleged that the informers conducted illegal deals including the sale of two pieces of rhino horn they had stolen from an impounded seizure in May 2014 at Entebbe International Airport. One of the informers was forthcoming with information concerning the theft of rhino horns and ivory from the Entebbe airport, and the UWA investigation confirmed the rhino horn theft.⁹⁹

Then on October 24, 2014, an internal audit of the UWA's stockroom found that at least 1.35 metric tons (nearly 3,000 pounds) of elephant ivory had gone missing from 2009 to 2014.¹⁰⁰ The ivory in UWA's stockrooms, some of it likely originating from Garamba National Park, had reportedly been seized from various small-time traffickers.

Despite the massive loss of ivory, and the security risk involved as the storeroom also held rangers' weapons and ammunition, there have not been real consequences for those responsible. The internal UWA report from September 22, 2014, recommended an investigation into the matter carried out jointly by the police, UWA, and the army, as well as a series of other measures designed to punish the culprits and increase the security of the stockroom.¹⁰¹ A whistleblower then took the case to the police offices of the Criminal Investigations Department (CID) and Inspector General of Government (IGG), only to be allegedly told that neither department had the resources nor the time to investigate the matter.¹⁰² At the police station, the whistleblower was reportedly told, "Who cares? These are just dead elephants."¹⁰³ Frustrated, the whistleblower went to the media. On November 10, 2014, the story ran on the front page of the daily newspaper *New Vision*.¹⁰⁴ It apparently caught the attention of President Museveni who allegedly ordered the IGG to open an investigation.¹⁰⁵

The UWA internal report implicated six UWA employees in total, including Ugandan army officers. The Inspector General of Government charged four people in January 2016, including former UWA head ranger Moses Sikuku, former assistant warden enforcement officer Prosper Wasike, head of law enforcement Moses Olinga, and armory clerk John Lapeyo.¹⁰⁶ Sikuku's case was dropped for reported lack of evidence, but the other three cases were ongoing, and a hearing was scheduled for June 2017. All three maintain their innocence. Their cases have gone on for more than a year and a half in the Ugandan High Court's Anti-Corruption Division (ACD) court with no judgment yet.¹⁰⁷ Despite UWA claims of "high level UWA officials punished"¹⁰⁸ for the massive theft of ivory, there have been as of yet no consequences for people in charge, although the theft was reported three years ago.

No charges were brought against the army officers accused in the UWA report. UWA's executive director, Seguya, was asked to take leave for two months by the Ministry of Tourism but was then reinstated because the ministry, according to its Permanent Secretary Ambassador Patrick Mugoya, "could not carry out the investigations successfully when the UWA chief was unfairly out of office and that failure to reinstate him could only be construed as obstructing investigations."¹⁰⁹ However, Seguya is now under investigation again per President Museveni's letter to the IGG on May 2, 2017. He denies the charges.¹¹⁰

For the other investigations, it has been close to two years since the IGG opened its cases, and its findings have not been made public or shared with defense lawyers as the law requires. The cases of the accused men are stalled, according to some. "I had to take my children out of school," Olinga told the Enough Project in an interview. "I have been made a scapegoat so that the big guys can go free."¹¹¹

It remains unclear what happened to the ivory stolen from UWA storerooms. It could have been shipped out of Uganda via Entebbe International Airport in smaller consignments. Authorities seized approximately 700 kilograms (1,500 pounds) of ivory at the airport in January 2015. It could have been the stolen ivory, as some of it matched previously marked samples.¹¹²

This is where “follow the money” investigations may be particularly helpful. Now that some individuals have been convicted of ivory trafficking, and others are under investigation, following the trail to determine who they sent money to and received money from would help identify the real profiteers of the poaching and ivory trafficking supply chain. Those profiteers should be the targets of further prosecution. Ugandan and other foreign courts, including those in the European Union and the United States, with jurisdiction over individuals and companies suspected of high-level involvement in illegal ivory trafficking should investigate the most serious cases of trafficking, money laundering, and other related crimes. Financial intelligence units in the United States and Europe, banks, and other financial institutions should build on the study produced in mid-2016 by the Eastern and Southern Africa Anti-Money Laundering Group¹¹³ to combat the laundering of the proceeds of trafficking through the international financial system.

A license to kill – the Pangolin scales deal

The smuggling of another species, the pangolin, which is an endangered scaly mammal, also occurs in Uganda, and UWA officials appear to have been implicated in its smuggling at times. Pangolins are endangered, according to CITES, of which Uganda is a signatory.¹¹⁴ There were a number of seizures and arrests for pangolin smuggling in Uganda in 2016 and into 2017,¹¹⁵ which is a positive development. However, in 2014-15, an extensive arrangement for the collection of pangolin scales allegedly involving UWA officials likely led to pangolin poaching in the region. In the January 2015 ivory seizure at Entebbe’s airport described above, two tons of pangolin scales were also seized, hidden in cartons labeled as electronic equipment destined for the Netherlands.¹¹⁶ The seizure’s timing was interesting as it coincided with a legal case concerning seven tons of pangolin scales destined for export to China. When the ivory theft from UWA stores became public, an article appeared in the Ugandan press claiming that the UWA executive director had issued a permit to a local dealer to export over seven tons of pangolin scales.¹¹⁷



Pangolins, two species of which are endangered, are increasingly smuggled from Congo through South Sudan and Uganda. Photo: Valerius Tygart/Wikimedia.

In July 2014, a local company, Smico Skin Crafts Industries Limited, was granted a permit by UWA, signed by UWA’s executive director Seguya, to collect 7,310 kilograms (more than 16,000 pounds) of so-called Giant Pangolins (*Manis Gigantea*), from communities throughout Uganda.¹¹⁸ In January 2015, lawyers from the local environmental organization Greenwatch Uganda brought a civil suit against UWA arguing that by issuing such a permit, UWA acted against its own stated interest of protecting animals, essentially giving out a ‘license to kill’ pangolins.¹¹⁹

According to court documents, UWA lawyers responded that the license was only valid for pangolin scales from dead pangolins, collected by communities over the years.¹²⁰ There was, however, no supervision of

how the scales were collected by UWA employees. It is hard to believe that over seven tons of scales from pangolins, wild animals described as reclusive and avoiding contact with humans, were easily available to be collected by community members. By Ugandan law, citizens are not allowed to possess wildlife, a fact ignored by UWA in the issuance of this license.¹²¹

According to a Ugandan lawyer, the Smico's owner was granted the license without a legal tender, an illegal act under Ugandan law.¹²² In addition, UWA handed Smico over 150 kilograms (330 pounds) of pangolin scales from UWA stores even though some of the scales were exhibits in an ongoing legal case against pangolin poachers.¹²³ UWA priced the scales at \$50 per kilogram (\$23 per pound) even though black market rates amounted to \$600 per kilogram (\$272 per pound).¹²⁴



In a separate case, rangers from Congo's ICCN (Institut Congolais pour la Conservation de la Nature) and Garamba National Park, managed by the conservation NGO African Parks, intercepted an attempt to traffic 73 kilograms of illicit giant pangolin scales in February 2017. Photo: African Parks/Naftali Honig.

According to internal UWA communications, by the end of December 2014, Smico had not paid UWA for the scales or other wildlife its owner had taken out of UWA stores more than six months prior.¹²⁵ Court documents showed that Seguya ignored warnings by other UWA officials handwritten in the margins of correspondence between Smico and Seguya that the pangolin license would encourage the killing of pangolins.¹²⁶ Seguya reportedly swore an affidavit that the export of pangolin scales is legal and poses no danger to wildlife population, "since stringent guiding measures are in place for sustainability" and that the Smico transaction was legal because the pangolin scales were from a collection of old trophies and diseased animals from the 1960s.¹²⁷ Smico's lawyers responded by saying, "It is averred that the rationale for issuance of the licence is to ensure that wildlife resources are utilised sustainably under the supervision of the defendant in fulfillment of the principle of sustainable development."¹²⁸

In March 2015 the Ugandan courts temporarily stopped UWA from issuing pangolin export licenses. Then in June 2015, Ugandan Judge Elizabeth Musoke dismissed the Greenwatch lawsuit, allowed Smico to export the scales—about one metric ton—for which it had already secured an export permit from the Ministry of Agriculture, but ordered that certain measures be implemented in the future to avoid the "illicit killing by avaricious and rapacious individuals."¹²⁹ The measures included carrying out a census of pangolins in the country, effective and credible supervised collection and provision of annual quotas, or what UWA should have done as part of their mandate in the first place. The judge also ordered Smico to pay to UWA the amount of money it owed, a full year after it had received the scales.¹³⁰

It is unclear what Smico did with the more than six tons of pangolin scales it had collected. UWA officially claimed that it had won the court case even though the ruling clearly states that UWA had failed to carry out its mandate.

Alleged higher-level interference in Uganda

UWA's top leadership have not yet been held accountable for the scandals on its watch, including the permitting of pangolin scales and the massive loss of ivory, which apart from being detrimental to Uganda's environment had also a tangible cost for the Ugandan taxpayer. The amount of ivory lost from its stores was roughly valued at \$1.1 million while the pangolin scales were valued at more than \$4 million in total.¹³¹

Conservation experts and other knowledgeable sources in Uganda claimed that in addition to corruption, UWA's top leadership may have also been motivated by fear from high-level government officials, who pressure UWA directors into handing out illegal permits or turning a blind eye to the wildlife smuggling.

Two former senior UWA officials said they quit after being unable to deal with the governmental pressure.¹³² "I had to deal with a few [corrupt businesses]," one told the Enough Project, "but every time we would catch them or refuse them illegal permits for things like tortoises or hippo teeth, I would get a call from State House [the president's office] asking me to do it."¹³³ The other former UWA executive in a separate interview with the Enough Project claimed, "We [at UWA] had a government minister who wanted to take the funds from the gorilla permits, which are paid two years in advance and are not technically ours until the visits to see the gorillas are completed, to run his own personal campaign for a high position in the NRM [National Resistance Movement - the ruling party]."¹³⁴

The ivory theft and pangolins deal were not the first times that UWA was implicated in some form of morally and legally questionable behavior. In 2010, UWA executives were fired, allegedly, over issuing unlawful permits as a result of pressure from government officials. As a newspaper article at the time stated, "According to our investigations [by the newspaper *Daily Monitor*], the award of lucrative contracts in the wildlife agency often depended on political directives with the Vice President [of the Ugandan government] cited among others."¹³⁵ A Ugandan journalist and political commentator observed, "Personal influence in government affairs is pervasive in this country." Kalundi Serumaga continued, "People close to power use governmental agencies, such as UWA, as private fiefdoms and their bank accounts, a clear example of state capture."¹³⁶

There was a sense of despair, if not outright surrender, from many conservationists interviewed for this report in South Sudan and Uganda. "Protecting animals in this part [of Africa] is a losing battle," claimed a U.S. government official, who did not wish to be identified because of fear it would jeopardize relationships between the United States and Uganda, adding that, "many people in the government [of Uganda] are implicated in trafficking of wildlife and we cannot realistically shame them all."¹³⁷ The Enough Project was not able to independently verify these claims.

Conclusion

Uganda and South Sudan appear to be increasingly important trafficking way stations for illegally poached wildlife from the Democratic Republic of Congo, particularly Garamba National Park. There has been significant anti-trafficking work done in neighboring Kenya and Tanzania in recent years. For example, a high-level task force arrested hundreds of ivory poachers, including the Chinese smuggler Yang Feng Glan, aka “Ivory Queen” in 2015, who reportedly confessed to ivory trafficking in October 2016.¹³⁸ Yang’s lawyer and daughter both denied that Yang was guilty of ivory smuggling.¹³⁹ It has also led to several convictions, including those of two other significant Chinese smugglers in 2016.¹⁴⁰ Uganda has only recently begun to take increased action against traffickers, e.g., with its new dedicated wildlife court, prosecutions and sentences for traffickers, including security officers, and work on reforming its 20-year-old wildlife law. Arrests for wildlife trafficking have risen over the past two years in Uganda. USAID and the U.S. Department of Interior have begun to provide technical assistance, for example, providing crime scene investigation kits to Ugandan authorities in January 2017, and, as discussed above, Ugandan President Museveni has now ordered a high-level investigation into wildlife trafficking.¹⁴¹ Moreover, the U.K. government and the U.S. Fish and Wildlife Service have aided local anti-trafficking groups, which is helpful.

Despite these positive developments, there is a longer recent history marked by a lack of high-level policy action and prosecutions related to trafficking in Uganda. International traffickers still use Uganda to smuggle wildlife, and so there remains an uphill battle to combat this. Meanwhile, across the border, the South Sudanese government has not yet seen high-level action that has led to positive results. In March 2017, South Sudanese President Salva Kiir announced a ban on the ivory trade in South Sudan in an attempt to curb poaching.¹⁴² In South Sudan, the situation is exacerbated by the continuing conflict. Greater attention and action is needed to deal with traffickers in these countries, who are often affiliated with or part of security services.

More must also be done on the ground where poaching is occurring in and around Garamba Park, e.g., by providing thermal recognition, night vision, or other technology to park rangers to help increase their interdiction capabilities, and/or the United Nations Organization Stabilization Mission in the Democratic Republic of the Congo (MONUSCO) working more closely with the rangers, who are employed by African Parks. But long-term and effective solutions require engagement at the highest levels of government and continued follow-up by the justice systems in Uganda, South Sudan, and the region to ensure that government protection is not afforded to poachers and traffickers alike. The United States, Europe, and the United Nations have an important role to play in combating wildlife trafficking in these countries, particularly in helping ensure that high-level smuggling cases are prosecuted, and to help follow the money with international investigations into the major profiteers of the wildlife trade in East and Central Africa. Finally, financial intelligence units and banks can implement the recommendations presented by the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG) in a comprehensive typology study in 2016, including through awareness-raising and capacity building as well as focusing on specific cases based on the examples presented in the report. These policy actions, and others detailed in this report’s executive summary, are the types of actions governments and authorities can take to disrupt wildlife trafficking and the corruption associated with it before the elephants, pangolins, and other poached animals become extinct from the region.

Endnotes

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- ¹² Rodney Muhumuza, “Uganda seizes ton of ivory, arrests 2 West African suspects,” Associated Press, February 18, 2017, available at <https://apnews.com/ebd7c6990d52412f85c2fe29dc36c7f0/uganda-seizes-ton-ivory-arrests-2-west-african-suspects>.
- ¹³ President Museveni in a letter to the Inspector General of Government dated May 2, 2017, stated that the IGG should investigate UWA Executive Director Andrew Seguya for “trying to get bribes from Centenary Bank, DFCU and Crane Bank so as to maintain the Shs. 28 billion deposits in those banks. When the banks refused to bribe him, he withdrew the money and caused loss of Shs. 1.5 billion. Even without causing financial loss, it is criminal enough for a public officer to ask for a bribe.” Seguya denied this allegation, stating that money that is fixed in banks is earned through sale of gorilla permits which is done in up to two years in advance of actual gorilla tracking by tourists. “The decisions related to fixing such funds are vested in the board of trustees and not the executive director. I don’t have powers to deposit or withdraw this money. There is no basis for soliciting a bribe and this allegation is false,” Seguya said, adding that such decisions are done through a transparent bidding process that eventually awards the bank with the best interest rates. See, UWA Executive Director on President Yoweri Museveni, letter to Inspectorate General of Government, May 2, 2017, found in Namugerwa Martha, “Museveni Directs IGG to Suspend UWA Boss Seguya Over Corruption, Smuggling, Mismanagement of Wildlife Body,” Business Guide Africa, June 1, 2017, available at <https://businessguideafrica.com/museveni-directs-igg-to-suspend-uwa-boss-seguya-over-corruption-smuggling-mismanagement-of-wildlife-body/>; and Sadab Kitatta Kaaya, “Ivory Scam Claims - China Piles Pressure On Uganda,” The Observer (Kampala), June 5, 2017, available at <http://allafrica.com/stories/201706050298.html>.
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- ²¹ Enough Project interview with former U.N. Group of Experts on the DRC researcher, January 17, 2017.

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⁷⁴ According to the Uganda *Daily Monitor* newspaper, in a January 14 letter from the Ministry of Tourism the Inspector General of Government was advised that Seguya was sent on leave without following the “human resource manual” of both the ministry and the wildlife agency. The tourism minister Maria Mutagamba said “her office could not carry out the investigations successfully when the UWA chief was unfairly out of office and that failure to reinstate him could only be construed as obstructing investigations.” Seguya did not respond to requests for comment from *The Monitor* on this story. See, Paul Tajuba “Seguya Returns to UWA,” *Daily Monitor*, January 26, 2015, available at <http://mobile.monitor.co.ug/News/Seguya-returns-to-UWA/2466686-2602056-format-xhtml-iixbx4z/index.html>.

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⁷⁷ Enough Project interview with a source who was not identified to protect their security, February 2017.

⁷⁸ Police statements with Enough Project and author interviews, Kampala, June 2016.

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⁹⁰ Betty Ndagire, “Uganda: Soldiers Fined Shs4 Million for Stealing Ivory,” *Daily Monitor*, February 28, 2017, available at <http://allafrica.com/stories/201703010085.html>; Police statements with Enough Project.

⁹¹ Ibid.

⁹² Ndagire, “Uganda: Soldiers Fined Shs4 Million for Stealing Ivory,” *Daily Monitor*.

⁹³ The *Uganda Observer* also states that the letter may have originated from an internal rivalry between the Uganda Tourism Board and the Uganda Wildlife Authority.

⁹⁴ One of the allegations in the letter has turned out to be incorrect, that of Chinese diplomats smuggling wildlife, for which the Ugandan Foreign Affairs Ministry apologized to the Chinese embassy. See, Sadab Kitatta Kaaya, “Ivory Scam - Shame As Uganda Apologises to China,” *The Observer* (Kampala), June 12, 2017, available at <http://allafrica.com/stories/201706120682.html>

⁹⁵ UWA official documents and website, available at <http://www.ugandawildlife.org>.

⁹⁶ Enough interview with Gerald Tenywa, March 13, 2016.

⁹⁷ UWA internal report with Enough Project.

⁹⁸ Uganda Wildlife Authority, “Report on Alleged Ivory and Rhino Horn Theft,” Internal Memorandum, September 22, 2014, viewed by the Enough Project.

⁹⁹ UWA, “Report on Alleged Ivory and Rhino Horn Theft,” September 22, 2014.

¹⁰⁰ UWA internal report and audit report with Enough Project.

¹⁰¹ UWA internal report with Enough Project.

¹⁰² Author interviews with the whistleblower who is not named to protect their security, March and June 2016.

¹⁰³ Author interviews with whistleblower, March and June 2016.

¹⁰⁴ See, “Gerald Tenywa, “Sh3b ivory goes missing at UWA,” *New Vision*, November 11, 2014, available at <https://www.scribd.com/document/261950098/Environment-reporting-Runner-up-Gerald-Tenywa-New-Vision#>.

¹⁰⁵ Author interview with Gerald Tenywa, March 13, 2016.

¹⁰⁶ Michael Odeng, “UWA officials at center of missing ivory case granted bail,” *New Vision*, January 21, 2016, available at http://www.newvision.co.ug/new_vision/news/1415393/uwa-officials-center-missing-ivory-granted-bail

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- ¹⁰⁸ Various statements by UWA officials; and Enough interview with Jossy Muhangi, UWA Press Office, June 6, 2016.
- ¹⁰⁹ Paul Tajuba, “Seguya Returns to UWA,” Daily Monitor, January 26, 2015, available at <http://www.monitor.co.ug/News/National/Seguya-returns-to-UWA/688334-2602056-14ibdxz/index.html>
- ¹¹⁰ President Museveni in a letter to the Inspector General of Government dated May 2, 2017 stated that the IGG should investigate UWA Executive Director Andrew Seguya for “trying to get bribes from Centenary Bank, DFCU and Crane Bank so as to maintain the Shs. 28 billion deposits in those banks. When the banks refused to bribe him, he withdrew the money and caused loss of Shs. 1.5 billion. Even without causing financial loss, it is criminal enough for a public officer to ask for a bribe.” Seguya denied this allegation, stating that money that is fixed in banks is earned through sale of gorilla permits which is done in up to two years in advance of actual gorilla tracking by tourists. “The decisions related to fixing such funds are vested in the board of trustees and not the executive director. I don't have powers to deposit or withdraw this money. There is no basis for soliciting a bribe and this allegation is false,” Seguya said, adding that such decisions are done through a transparent bidding process that eventually awards the bank with the best interest rates.” See, UWA Executive Director on President Yoweri Museveni, letter to Inspectorate General of Government, May 2, 2017, found in Namugerwa Martha, “Museveni Directs IGG to Suspend UWA Boss Seguya Over Corruption, Smuggling, Mismanagement of Wildlife Body,” Business Guide Africa, June 1, 2017, available at <https://businessguideafrica.com/museveni-directs-igg-to-suspend-uwa-boss-seguya-over-corruption-smuggling-mismanagement-of-wildlife-body/>; and Sadab Kitatta Kaaya, “Ivory Scam Claims - China Piles Pressure On Uganda,” The Observer (Kampala), June 5, 2017, available at <http://allafrica.com/stories/201706050298.html>.
- ¹¹¹ Author interviews with Moses Olinga, March and June 2016.
- ¹¹² Author interviews with conservation experts, Kampala, March and June 2016, and “NRCN Monthly Activity Report,” July 2015.
- ¹¹³ Eastern and Southern Africa Anti-Money Laundering Group, “A Special Typologies Project Report on Poaching and Illegal Trade in Wildlife and Wildlife Products and Associated Money Laundering in the ESAAMLG Region,” June 2016.
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- ¹¹⁵ See the Eagle Enforcement Network News site for more information about dozens of such arrests. Available at <http://www.eagle-enforcement.org/news/>
- ¹¹⁶ Agence France-Presse, “Uganda seizes massive ivory and pangolin haul,” found in The East African, January 26, 2015, available at <http://www.theeastafrican.co.ke/news/Uganda-seizes-massive-ivory-and-pangolin-haul/-/2558/2602708/-/dbavr1z/-/index.html>.
- ¹¹⁷ The New Vision, “UWA clears export of sh11b pangolin scales,” January 21, 2015, available at http://www.newvision.co.ug/new_vision/news/1319347/uwa-clears-export-sh11b-pangolin-scales.
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- ¹¹⁹ Court documents with Enough Project.
- ¹²⁰ Ibid.
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- ¹²² Author interview with Ugandan lawyer, Kampala, June 7, 2016.
- ¹²³ Author interview with conservation expert, Kampala, June 8, 2016, and UWA employee handwritten note on margins of internal UWA documents with Enough Project.
- ¹²⁴ Court documents viewed by the Enough Project.
- ¹²⁵ Court documents viewed by the Enough Project.
- ¹²⁶ Court documents viewed by the Enough Project.
- ¹²⁷ New Vision, “Why court endorsed businessman’s pangolin scales export,” June 12, 2015, available at http://www.newvision.co.ug/new_vision/news/1328167/court-endorsed-businessmans-pangolin-scales-export; Halima Abdallah, “Countries agree on upgrade of threat level facing the pangolin and ban its trade,” East African, October 11, 2016, available at <http://www.theeastafrican.co.ke/news/Countries-agree-on-upgrade-of-threat-level-facing-the-pangolin/2558-3411484-4snvyx/index.html>.
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