Treasury Sanctions Four Ugandans for Involvement in False Adoption Scam

August 17, 2020

Washington – Today, the U.S. Department of the Treasury’s Office of Foreign Assets Control (OFAC) sanctioned four Ugandans pursuant to Executive Order (E.O.) 13818, which builds upon and implements the Global Magnitsky Human Rights Accountability Act, for their involvement in an adoption scam that saw many Uganda-born children victimized by the participants in the scheme.

“Deceiving innocent Ugandan families into giving up their children for adoption has caused great suffering,” said Deputy Secretary of the Treasury Justin G. Muzinich. “The individuals involved in this corrupt scam deliberately exploited the good faith of Ugandans and Americans to enrich themselves. The United States remains committed to seeking out and exposing individuals violating human rights across the world.”

ADOPTION SCAM

Ugandan judges Moses Mukiibi (Mukiibi) and Wilson Musalu Musene (Musene), Ugandan lawyer Dorah Mirembe (Mirembe), and Mirembe’s husband, Patrick Ecobu (Ecobu), participated in a scheme whereby, in certain instances, young children were removed from Ugandan families under promises for “special education” programs and study in the United States, and were subsequently offered to U.S. families for adoption. The adoption agency organizing the scheme used Mirembe’s law firm to handle the legal aspects of the adoptions, in some cases through the manipulation or falsification of court documents. Further, Mirembe’s law firm at times hired or used the services of intermediary parties to seek out vulnerable families in remote Ugandan villages to manipulate parents — who often could not read or write English — into giving their children up for adoption under false pretenses. Mirembe’s law firm, directly or through its intermediaries, promised parents that their children would be moved to Kampala, Uganda, and looked after by missionaries while being educated. Once removed from their homes, many of the children were placed primarily into one unlicensed children’s home in Kampala, and many were made to appear before
courts as though they were in fact orphans. Unwitting American prospective adoptive
parent(s) would then arrive in Uganda to adopt the children and bring them back to America.

In order to arrange the adoption of the children, Mirembe, with the assistance of Ecobu,
facilitated multiple bribes to Ugandan judges Mukiibi, Musene, and other Ugandan
government officials, either directly or through an interlocutor. Mirembe had negotiated with
Musene a flat fee for processing adoption cases. In at least one case, Mirembe met directly
with Musene to arrange an additional amount of money required for Musene to expedite the
date of a pending adoption case on Musene’s court calendar. Following Musene’s transfer to
a different court division, Mirembe arranged to get cases steered to Mukiibi, to whom at
least one individual paid cash bribes at the direction of Mirembe.

MOSES MUKIIBI and WILSON MUSALU MUSENE

Mukiibi and Musene are current or former government officials, or persons acting for or on
behalf of such an official, who are responsible for or complicit in, or who have directly or
indirectly engaged in corruption, including the misappropriation of state assets, the
expropriation of private assets for personal gain, corruption related to government contracts
or the extraction of natural resources, or bribery.

DORAH MIREMBE and PATRICK ECOBU

Mirembe and Ecobu have materially assisted, sponsored, or provided financial, material, or
technological support for, or goods or services to or in support of, corruption, including the
misappropriation of state assets, the expropriation of private assets for personal gain,
corruption related to government contracts or the extraction of natural resources, or bribery.

SANCTIONS IMPLICATIONS

As a result of today’s action, all property and interests in property of the individuals named
above, and of any entities that are owned, directly or indirectly, 50 percent or more by them,
individually, or with other blocked persons, that are in the United States or in the possession
or control of U.S. persons, are blocked and must be reported to OFAC. Unless authorized by
a general or specific license issued by OFAC or otherwise exempt, OFAC’s regulations
generally prohibit all transactions by U.S. persons or within (or transiting) the United States
that involve any property or interests in property of designated or otherwise blocked
persons. The prohibitions include the making of any contribution or provision of funds,
goods, or services by, to, or for the benefit of any blocked person or the receipt of any
contribution or provision of funds, goods or services from any such person.
GLOBAL MAGNITSKY

Building upon the Global Magnitsky Human Rights Accountability Act, the President signed E.O. 13818 on December 20, 2017, in which the President found that the prevalence of human rights abuse and corruption that have their source, in whole or in substantial part, outside the United States, had reached such scope and gravity that it threatens the stability of international political and economic systems. Human rights abuse and corruption undermine the values that form an essential foundation of stable, secure, and functioning societies; have devastating impacts on individuals; weaken democratic institutions; degrade the rule of law; perpetuate violent conflicts; facilitate the activities of dangerous persons; and undermine economic markets. The United States seeks to impose tangible and significant consequences on those who commit serious human rights abuse or engage in corruption, as well as to protect the financial system of the United States from abuse by these same persons.

For more information on the individuals designated today, click here.

In addition to their designation pursuant to E.O. 13818, the Department of State imposed visa restrictions on Mukibi and Musene under Section 7031(c) of the Department of State, Foreign Operations, and Related Programs Appropriations Act, 2020 (Div. G, P.L. 116-94).

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