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**AFFIDAVIT OF FACTS**

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I, the undersigned,


**EMMANUEL SERETSE MOHALODI**

Do hereby make an oath and state that:

1. I am an adult male of full legal capacity residing at [REDACTED] Ward in [REDACTED] Constituency.
2. I aver that I am a bona fide life member of the Botswana Democratic Party (hereinafter referred to as "the BDP").
3. I aver that all the facts stated hereunder are within my personal knowledge and belief and are true and correct, unless the context depicts otherwise.

**BDP VOTE RIGGING TEAMS**

4. I am entitled to depose to this affidavit on my own behalf and by virtue of being a member of one of the BDP Teams set up to carry out a vote rigging operation in the just ended 23<sup>rd</sup> October 2019 General elections.
5. There were several Teams set up and headed by different members of the Botswana Democratic Party. One such Team was headed by Moemedi Dennis Baikalafi, who is a member of the Botswana Democratic Party (BDP) Communications Support Sub Committee.
6. I and Sekati Selaledi and other BDP trusted activists were involved in the operation. All Teams were given targets per ward in each Constituency. The target was **600** voters per ward for Gantsi North and South, Kgalagadi North & South, Takatokwane-Dutlwe Constituency, Jwaneng-Mabutswane, Kanye North & South, and all other rural based Constituencies.
7. In other wards the target was not reached but a substantial number of voters were trafficked.
8. I aver that the target for Gaborone Constituencies was **500** voters per ward and in some wards we exceeded the target.
9. I aver that the aforesaid operation was supervised by BDP Secretary General, Mpho Balopi, and BDP Chairperson, His Honour the Vice-President, Mr. Slumber Tsogwane.
10. His Excellency the President, Dr Mokweetsi Eric Masisi, coordinated the entire operation as Chief Campaigner of the BDP.

  
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## **DISS SLASH FUND**

11. Directorate of Intelligence and Security Services (hereinafter referred to as DISS) was involved with logistics and provision of slash-fund. DISS contributed **P15, 000 000.00** (Fifteen million Pula) to carry out the vote rigging exercise.
12. DISS coordinated the said operation from each region. We were provided with transport, accommodation and allowance by DISS whenever we were in their regions.
13. In Central District Region, it was coordinated by **Trouser**, who is the DISS Regional overseer of Central District Region.
14. Maphakwane, a Private Secretary to the President worked closely with DISS Director to ensure that the operation ran smoothly.

## **DOUBLE REGISTRATION OF VOTERS**

15. I aver that from 3<sup>rd</sup> September 2018 up to 28<sup>th</sup> April 2019, I together with Sekati Selaedi and other BDP Teams, were engaged by BDP leadership aforesaid to ferry thousands of people to register in all five (5) Gaborone Constituencies from the following villages and towns:
  - a) Ditshegwane village to Gaborone North & Vice-versa
  - b) Lobatse
  - c) Kanye South
  - d) Kanye North
  - e) Goodhope –Mabule
  - f) Mmathethe-Molapowabojang
  - g) Molepolole North & South
  - h) Kgatleng West
  - i) Kgatleng East
  - j) Mahalapye East
  - k) Mahalapye West
  - l) Thamaga-Kukwane
  - m) Mogoditshane
  - n) Tlokweng
  - o) Ramotswa
  - p) Lephephe-Letlhakeng
  - q) Shoshong to Tati-West
  - r) Serowe to Boteti West
  - s) Boteti West to Serowe
  - t) Palapye to Boteti East & Vice-versa
16. I aver that we trafficked voters from Lobatse residing at Peleng Central, Peleng East (Beirut), Botoka, and Tsopeng South to register them in Gaborone South.
17. I further aver that we trafficked about **500** people into each ward at Gaborone South Constituency. We trafficked about **3000** voters into

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Gaborone South and majority of these **3000** voters resided and voted in Lobatse Constituency as well.

18. I aver that other voters came from Mochudi to vote in Gaborone South at Babusi ward. They were trafficked by Mr. Phuthego Modise and they were registered using expired identity cards. Mr. Modise and I took a lot of people to omang headquarters to get new identity cards on the day of the elections, 23<sup>rd</sup> October 2019.
19. I aver that we ferried people from Ditshegwane village to Gaborone North and they voted in Phakalane ward. The said people voted in Takwatokwane-Dutlwe Constituency. In all, they voted twice, both at Gaborone North and Takatokwane-Dutlwe.
20. I aver that we (Selaledi and I) ferried people from Tsabong to Mabutsane and vice-versa.
21. We also ferried from Kang to Jwaneng-Mabutshane Constituency and vice-versa.
22. I further aver that voters were ferried from Ngami Constituency to Ghanzi North Constituency and vice-versa.
23. We ferried people from Kanye Constituencies to Gaborone and vice-versa.
24. We also ferried people from Good-Hope Mabule Constituency to Lobatse and vice-versa.
25. Voters from Molepolole Constituencies were ferried to vote in Kgatleng Constituencies and vice-versa.
26. Voters from Kopong- Lentsweletau were trafficked to Tlokweng and vice-versa.
27. People were trafficked from Selibe-Phikwe East & West to Shashe West and Tati West.
28. Shoshong voters were trafficked to Lephephe-Letlhakeng. It is imperative to state that nothing was trafficked into Shoshong because Phillip Malekgalemele was viewed as anti-Masisi.
29. Maun voters were trafficked into Boteti West constituency and none were taken from Boteti West to Maun East since Constas Maricos was viewed as pro- Venson Moitoi.
30. Keaboka Mbulawa was never assisted, save that he might have traficked on his own volition. He was not trusted. He was considered as pro- Moitoi candidate masquerading as Masisi guy.

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31. People were also trafficked from Francistown South to Tswapong South. No people were trafficked into Francistown South from outside Francistown South by our teams.
32. People were also trafficked from Tonota Constituency to Tswapong South.
33. People were trafficked from three wards Nkange Constituency to Chobe Constituency. People also trafficked people from Nata-Gweta to Chobe Constituency.
34. People were trafficked from Jwaneng-Mabutsane to Gabane-Mmankodi. Others were ferried from Mmathethe -Molapowabojang.
35. People from Moshupa-Manyana and Kopong-lentsweletau were trafficked to Gaborone Bonnington North.
36. I aver that voters would first vote at their place of origin and be transport to the second constituency to vote. For instance, voters from Ditshegwane and surrounding villages voted at Takatokwane Constituency before transported to Gaborone North.
37. Similarly, voters from Kanye Constituencies voted first at Kanye constituencies and be ferried to Gaborone Constituencies to vote for the second time.
38. I aver that the foregoing modus operandi was repeated in all constituencies were voters would vote at their home villages or towns and then move to the second Constituency to vote for the second time.
39. In constituencies were Parliamentary candidates were viewed as Anti-Masisi, voters would leave their home constituencies without voting and only vote in Constituencies deemed pro-Masisi only.
40. I aver that I am privy to all these operations because I and Sekati Selaledi were Team leaders.
41. I aver that they were many Team leaders covering the whole country in carrying out the rigging operation.
42. I aver that we would meet every week at State House II being the residence of His Excellency the Presidency, Dr Mokweetsi Eric Masisi, to report on the progress made. His Excellency the President was coordinating these meeting and operation.

#### **IEC ROLE IN ASSISTING BDP**

43. In executing our mandate we needed a mole at Independent Electoral Commission (IEC).

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44. The **IEC** moles or inside job operators were at two (2) levels. We had paid moles during registration exercise and at Headquarters after registration.

#### **DURING REGISTRATION EXERCISE**

45. As stated above, the BDP had verbal agreements with officials of the **IEC** who were hired to partake in the registration of voters from 3<sup>rd</sup> September 2018 to 11<sup>th</sup> November 2018, 17<sup>th</sup> December 2018 to mid-March 2019 and 15<sup>th</sup> April 2019 to 28<sup>th</sup> April 2019.

46. During the first registration which covered 3<sup>rd</sup> September 2018 to 11<sup>th</sup> November 2018, we realized that certain officials were not co-operative with BDP agents and were not re-hired in the subsequent registration exercise.

47. The terms of the verbal agreements were as follows:

- a) A BDP agent would bring a list of **25, or 30, or 50 or 100** people together with their National Identity Cards (hereinafter called **Omang**) to the registration point.
- b) The owners of these omang cards would not appear at the registration point.
- c) Some of these omang cards had expired but the **IEC** officials would register their owners as voters nonetheless.
- d) Food parcels and sums of money would exchange hands between BDP agents and **IEC** officials during registration exercise.
- e) Other names were submitted at the homes of these **IEC** officials to enter into the registration books after hours.
- f) The same lists of voters registered in, say Gaborone District, and would be registered again either at Tlokweng or Kanye or Lobatse or Ramotswa depending on whether these voters came from a nearby District.
- g) For instance, we would take voters from Lobatse District to Gaborone District or South East District to Gaborone District and vice-versa to avoid rejection of the said voters.
- h) The Russian system installed and operated by Omang office was such that if a voter had registered twice in the same District, that voter would be rejected. But if a voter registered in Kweneng District was to be registered in Gaborone or South East District or Kgatleng District the system would register him or her as a valid voter for the second time.

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- i) In light of the above explanation, all teams were drilled and advised that we should traffic voters from one District to another to avoid rejections aforesaid.

### **IEC HEADQUARTERS MOLES**

48. At the Independent Electoral Commission (**IEC**) our contact person was Dintle Rapoo stationed at the IEC Headquarters.
49. Initially a certain Toteng at IEC was giving us goose bumps and not trusted. This Toteng guy was later transferred because he was deemed a stumbling block. We also had District Commissioners doing our bids in various Districts.
50. For instance, Lee Lesetedi, former BDP Executive Secretary and current Gantsi District Commissioner, helped BDP a great deal in ensuring that our operation was smooth including on the voting day.
51. BDP Parliamentary Candidates and their Campaign Managers would visit the IEC, notably Mr. Dintle Rapoo, in possession of names of voters in memory sticks/cards to be inserted in the IEC data base/election rolls.
52. These visits were carried out after verification and certification of elections rolls. The aim and objective of the said visits were to add more voters in the election rolls under the guise that they were omitted during verification of voters' rolls period.
53. At the Gaborone District Commissioner's Office our anchor person was Principal Elections Officer, Mrs Ndlovu. The same goes to other District Commissioners' offices, majority of whom are BDP members and Returning Officers.

### **TRANSPORT DURING AND BEFORE ELECTIONS**

54. Buses, seven seaters' cars, mini-buses, Epsom 7 seaters were provided to Team leaders. Team leaders were also assisted by the Members of Parliament in concerned areas with cars to execute their mandate diligently.
55. During Election Day transport was provided to ferry voters who voted at Kanye Constituencies to go and vote in Gaborone Constituencies and vice-versa.
56. Team leaders would book queues at **3am** on the 23<sup>rd</sup> October 2019 and once the polling stations opened our voters voted first and transported them to another District to vote for the second time. They were plenty of buses and many other varieties of vehicles performing the functions of busing voters around the constituencies to vote twice.

### **MULTIPLE VOTING ON 23<sup>rd</sup> OCTOBER 2019 GENERAL ELECTIONS**

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57. I aver that I, Emmanuel Seretse Mohalodi, hereby confirm that in implementing the plan to vote twice in the just ended 2019 General Elections, I also voted twice. I voted at Madiba ward in Mahalapye West as well as in Lotlhakane East ward in Kanye South Constituency.
58. Our teams as aforesaid were set up to ensure that multiple voting takes place largely from South of Dibete up to Gantsi North. We selected few Constituencies North of Dibete, such as Shashe West, Boteti West, Tati West, Tati East, Tswapong South and Chobe. The other remaining constituencies north of Dibete were neglected since there was a strong view that Candidates in those affected Constituencies were Anti-Masisi.
59. I aver that voters who formed part of our lists and voted in Lobatse, Kanye Constituencies, Moshupa-Manyana Constituency, Ramotswa, Tlokweng, Kweneng Constituencies, Kgatleng Constituencies also voted in all Gaborone Constituencies for the second time.
60. We also ferried voters from Gaborone constituencies to vote in Molepolole constituencies and vice-versa.
61. As stated before, the said trafficked voters would vote early in the morning between **06:30am to 8am** and be transported to their second destination to vote for the second time. Hence big margins in South of Dibete Constituencies accrued from multiple voting orchestrated by the BDP leadership and team leaders aforesaid.
62. I strongly aver and confirm that BDP did not win 2019 general elections but rigged same through multiple voting.

#### **SNNUBBING OF ANTI-MASISI CAMP**


63. BDP members of Parliament who lost elections did so because they were viewed as Anti-Masisi. For instance, Makgato, Master Goya, Phillip Makgalemele, Thapelo Olopeng, Francisco Kgoboko, Lesedi Phuthego, and Bernard Bolele. Voters were not trafficked into their constituencies since they were viewed as anti-Masisi.

#### **DISTRIBUTION OF NATIONAL IDENTITY CARDS ON ELECTION DAY**

64. I aver that the BDP had an arrangement with the office producing and issuing out National Identity Cards to assist our teams in replacing lost omang cards as well as renew expired ones.
65. On the 22<sup>nd</sup> November 2019 national identity cards (Oman cards) for far flung constituencies were issued to BDP agents in thousands. Such constituencies in South of Dibete included Gantsi North, Kgalagadi North and South, Takatokwane and Letlhakeng-Lephephe Constituencies.
66. On the 23<sup>rd</sup> November 2019, I aver that I collected brown envelopes containing thousands of omang cards to deliver at the Lobatse omang Regional Office. I was using a government vehicle, notably Izuzu Bakker, to deliver omang cards at Lobatse.

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67. Upon arriving at Lobatse Regional Offices aforesaid, I found all BDP council candidates and Parliamentary Candidate, Dr Thapelo Matsheka, together with hundreds and hundreds of voters queuing for omang cards. There were neither single UDC or AP candidates nor their supporters at the said Regional Offices since this was a covert operation known to BDP leadership and their candidates.
68. Molapowabojang- Mmathethe, Goodhope- Mabule, Kanye North, Kanye South, and Jwaneng- Mabutsane also collected their omang cards from Lobatse Regional Office. This was exclusively for BDP candidates' benefit.
69. Prior to departing for Lobatse to deliver the said omang cards, I left Mr. Phuthogo Modise, then Council candidate for BDP at Babusi ward in Gaborone South, waiting to renew and replace omang cards in excess of **300**.
70. I aver that each Constituency in Gaborone renewed, replaced and collected over a thousand omang cards per constituency. All greater Gaborone constituencies renewed and collected hundreds of omang cards from the Headquarters
71. I repeat I was driven around in government vehicle bearing **Bx** registration numbers and letters to deliver the said omang cards in Lobatse for distribution to BDP candidates.
72. I confirm that I am neither an employee of government nor a parastatal employee. I further confirm that I am not working for any government structure. I was simple executing a BDP mission using government resources.
73. I confirm that the BDP rigged the 23<sup>rd</sup> October 2019 general elections by circulating voters from one constituency to another to vote twice contrary to the principle of one man one vote.
74. Finally, I confirm that the results ascribed to the BDP from the just ended general elections, especially south of Dibete, do not reflect the will or choice of the voter contrary to section **13** of the Constitution as read with section **31(2)** of the Electoral Act (Cap. 02:09).

  
 DEPONENT

THIS DONE AND SWORN BEFORE ME AT GABORONE THIS 26<sup>th</sup> DAY OF NOVEMBER 2019 AT 5:30 A.M./P.M. BY THE DEPONENT HAVING ACKNOWLEDGED THAT HE KNOWS AND UNDERSTANDS THE CONTENTS OF THIS AFFIDAVIT AND CONSIDERS SAME BINDING UPON HIS CONSCIENCE.

  
 COMMISSIONER OF OATHS

JORAM J. MATOMELA  
 ATTORNEY - AT - LAW  
 COMMISSIONER OF OATHS