REPUBLIC OF LIBERIA)
MONTSERRADO COUNTY)

IN THE FIRST JUDICIAL CIRCUIT, CRIMINAL COURT "C"
FOR MONTSERRADO COUNTY, REPUBLIC OF LIBERIA,
SITTING IN ITS AUGUST TERM, A.D. 2025.

BEFORE HIS HONOUR: OUSMAN F. FEIKA.....ASSIGNED CIRCUIT JUDGE PRESIDING

IN RE: Republic of Liberia by and thru Assets Recovery & Property Retrieval Task Force (AREPT) thru its Chairman, Cllr. Edwin K. Martin, and the Ministry of Justice and thru .....**PLAINTIFF**

VERSUS

Nora Finda Bundoo, former Deputy Minsiter/Chief of Protocol, Francis T. Blamo, Manager, Gracious Ride, Anita Pamela Jallah, Chief Executive Officer, Anita Group of Companies INc., Emmanuel Kollie, General Manager of Antia Business Center, Jimmy Emmanuel Flomo, Manager of Anita Business Center, Anthony Saytue, Manager, Anita Mining and Agriculture Development Cooperative Society; Philip Toe, Assistant Manager, Antia Mining and Atriculture Development Corporative Soceity, Praise Farley, Edwin Kai, Joyce Sawyer, Susannah Nollen, Catherine Satia, Boyd Wah, Gertude Daye, Jartu Tamba, Comfort Saye, Thelma Fanta Kromah, Socrate Weah, Kokulo S. Dorbor, Gayflor Y. Mulbah, Jones Hinneh, Johnson Sumo, Rev. Fallo Fallah, Mohammed Toure, Sophie Petter, Satia NY, Decontee Harris, Julian Wiah, Theo Nagbe, Samuel M. Barrain, Benson T. Wion, Benjimin T. Lathrobe, Seth A. Togba, Miller K. Sumo, Cherish to be Identified, Tokpa Ma to be Identified, Morining to be Identified, Mohammed Sesay to be Cummings, Robertons, Wayne Am, Anderson, Dennis Re, Yankey A, Sheriff A, Morning V, to be identified, Morris V, Sam Weah, all believed to be Staffs of the Anita Group of Companies thorugh its subsidiary, Anita Business Center; Thelma E. Ducan Sawyer, Deputy Minister for Administration, Minsitry of Foreign Affairs, G. Edmund Ponpon, Jr., Policy Analyst, Ministry of Commernce & Industry, and Others to be Identifies of the City of Monrovia, Liberia..... **DEFENDANTS**

CRIMES:

1. Money Laundering
2. Theft of Property
3. Misuse of Public Money, Property or Records
4. Criminal Conspiracy
5. Forgery and
6. Criminal Facilitation

INDICTMENT WRIT OF ARREST

REPUBLIC OF LIBERIA, TO: MAJOR AUSTINE SEINAVULA, SHERIFF, MONTSERRADO COUNTY, R.L. OR HIS DEPUTY, **GREETINGS:**

YOU ARE HEREBY COMMANDED TO **ARREST** THE LIVING **BODIES** OF THE ABOVE NAMED **DEFENDANTS** IN THE ABOVE ENTITLED CAUSE OF ACTION, CHARGED WITH THE COMMISION OF THE ABOVE MENTIONED CRIMES, BASED UPON THE INDICTMENT PREPARED AGAINST **THEM** BY THE GRAND JURY DULY SELECTED, EMPANELLED, AND SWORN TO INQUIRE IN AND FOR THE PEOPLE OF MONTSERRADO COUNTY, REPUBLIC OF LIBERIA, AND TO FORTHWITH BRING **THEM** BEFORE THIS HONORABLE COURT, (FIRST JUDICIAL CIRCUIT, CRIMINAL ASSIZES "C" FOR MONTSERRADO COUNTY), SITTING IN ITS **AUGUST TERM, A.D. 2025**, TO ANSWER TO THE SAID CHARGES MENTIONED SUPRA.

YOU ARE HEREBY FURTHER COMMANDED TO HAVE YOUR OFFICIAL RETURNS ENDORSED ON THE BACK OF THIS WRIT OF ARREST, INDICATING THE MANNER AND FORM OF ITS SERVICE.

AND FOR SO DOING, THIS SHALL CONSTITUTE YOUR LEGAL AND SUFFICIENT AUTHORITY.

AND HAVE YOU THERE THIS WRIT OF ARREST:

SEAL OF COURT:

JUDICIARY
CRIMINAL COURT
05 NOV 2025
TIME: 3:15 pm
C

GIVEN UNDER MY HAND AND SEAL
OF THIS HONORABLE COURT, THIS
5TH DAY **NOVEMBER**, A.D. **2025.**

KNOWLES W. SHAIN
CLERK OF COURT, CRIMINAL COURT "C"

REPUBLIC OF LIBERIA)
MONTSERRADO COUNTY)

IN THE FIRST JUDICIAL CIRCUIT, CRIMINAL COURT "C" FOR MONTSERRADO COUNTY, REPUBLIC OF LIBERIA, SITTING IN ITS AUGUST TERM, A.D. 2025.

BEFORE HIS HONOUR: OUSMAN F. FEIKA.....ASSIGNED CIRCUIT JUDGE PRESIDING

IN RE: Republic of Liberia by and thru Assets Recovery & Property Retrieval Task Force (AREPT) thru its Chairman, Cllr. Edwin K. Martin, and the Ministry of Justice and thru .....**PLAINTIFF**

VERSUS

Nora Finda Bundoo, former Deputy Minsiter/Chief of Protocol, Francis T. Blamo, Manager, Gracious Ride, Anita Pamela Jallah, Chief Executive Officer, Anita Group of Companies INc., Emmanuel Kollie, General Manager of Antia Business Center, Jimmy Emmanuel Flomo, Manager of Anita Business Center, Anthony Saytue, Manager, Anita Mining and Agriculture Development Cooperative Society; Philip Toe, Assistant Manager, Antia Mining and Atriculture Development Corporative Soceity, Praise Farley, Edwin Kai, Joyce Sawyer, Susannah Nollen, Catherine Satia, Boyd Wah, Gertude Daye, Jartu Tamba, Comfort Saye, Thelma Fanta Kromah, Socrate Weah, Kokulo S. Dorbor, Gayflor Y. Mulbah, Jones Hinneh, Johnson Sumo, Rev. Fallo Fallah, Mohammed Toure, Sophie Petter, Satia NY, Decontee Harris, Julian Wiah, Theo Nagbe, Samuel M. Barrain, Benson T. Wion, Benjimin T. Lathrobe, Seth A. Togba, Miller K. Sumo, Cherish to be Identified, Tokpa Ma to be Identified, Morining to be Identified, Mohammed Sesay to be Cummings, Robertons, Wayne Am, Anderson, Dennis Re, Yankey A, Sheriff A, Morning V, to be identified, Morris V, Sam Weah, all believed to be Staffs of the Anita Group of Companies thorugh its subsidiary, Anita Business Center; Thelma E. Ducan Sawyer, Deputy Minister for Administration, Minsitry of Foreign Affairs, G. Edmund Ponpon, Jr., Policy Analyst, Ministry of Commernce & Industry, and Others to be Identifies of the City of Monrovia, Liberia..... **DEFENDANTS**

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AND FOR SO DOING, THIS SHALL CONSTITUTE YOUR LEGAL AND SUFFICIENT AUTHORITY.

AND HAVE YOU THERE THIS WRIT OF ARREST:

GIVEN UNDER MY HAND AND SEAL OF THIS HONORABLE COURT, THIS 5TH DAY **NOVEMBER**, A.D. **2025.**

SEAL OF COURT:

JUDICIARY
CRIMINAL COURT "C"
05 NOV 2025
TIME: 3:15 pm
CLERK OF COURT: C

KNOWLES W. SHAIN
CLERK OF COURT, CRIMINAL COURT "C"

REPUBLICE OF LIBERIA)
MONTSERRADO COUNTY)

IN THE FIRST JUDICIAL CIRCUIT CRIMINAL
ASSIZES "A" FOR MONTSERRADO COUNTY,
SITTING IN ITS' AUGUST TERM A.D. 2025

BEFORE HIS HONOUR: ROOSEVELT Z. WILLIE..... RESIDENT CIRCUIT JUDGE

Republic of Liberia by and thru Assets Recovery & Property Retrieval Task Force (AREPT) and thru its, Chairman, Cllr. Edwin K. Martin; and and thru the Ministry of Justice.....Plaintiff

VERSUS

Nora Finda Bundoo, former Deputy Minister/Chief of protocol, Francis T. Blamo, Manager Gracious Ride, Anita Pamela Jallah, Chief Executive Officer, Anita Group of Companies Inc., Emmanuel Kollie, General Manager of Anita Business Center, Jimmy Emmanuel Flomo, Manager of Anita Business Center, Anthony Saytue, Manager, Anita Mining and Agriculture Development Cooperative Society, Philip Toe, Assistant Manager, Anita Mining and Agriculture Development Cooperative Society; Praise Farley, Edwin Kai, Joyce Sawyer, Susannah Nollen, Catherine Satia, Boyd Wah, Gertrude Daye, Jartu Tamba, Comfort Saye, Thelma Fanta Kromah, Socrate Weah, Kokulo S. Dorbor, Gayflor Y. Mulbah, Jones Hinneh, Johnson Sumo, Rev. Fallo Fallah, Mohammed Toure, Sophie Petter, Satia NY, Decontee Harris, Julian Wiah, Theo Nagbe, Samuel M. Barrain, Benson T. Wion, Benjimin T. Lathrobe, Seth A. Togba, Miller K. Sumo, Cherish to be identified, Tokpa Ma to be Identified, Moring to be identified, Mohammed Sesay to be Identified, Cummings, Robertson, Wayne Am, Anderson, Dennis Re, Yankey A, Sheriff A, Morning V, to be identified, Morris V, Sam Weah, all believed to be staffs of the Anita Group of companies through its subsidiary, Anita Business Center; Thelma E. Ducan Sawyer, Deputy Minister for Administration, Ministry of Foreign Affairs, G. Edmund Ponpon, Jr, Policy Analyst Ministry of Commerce & Industry, and others to be identified of the City of Monrovia, Liberia...
.....DEFENDANTS

CRIMES:
1. Money Laundering
2.Theft of Property
3. Misuse of Public Money, Property or Records
4. Criminal Conspiracy
5. Forgery
6. Criminal Facilitation

INDICTMENT

COUNT ONE (1) MONEY LAUNDERING

That, the Special Grand Jurors for Montserrado County, Republic of Liberia upon their oath do hereby find more probably than not, that, you Defendants, Nora Finda Bundoo, former Deputy Minister/Chief of protocol, Francis T. Blamo, Manager Gracious Ride/ Anita Group of Companies, , Saah Johnson Sr, in your personal capacity and as CEO, Marsaco Auto Services Inc, Emmanuel Kollie, in your

personal capacity and as General Manager of Anita Business Center, Jimmy Emmanuel Flomo, in your personal capacity and as Manager of Anita Business Center, Anthony Saytue, in your personal capacity and as Manager, Anita Mining and Agriculture Development Cooperative Society, Philip Toe, in your personal capacity and as Assistant Manager, Anita Mining and Agriculture Development Cooperative Society; Anita Pamela Jallah, in your personal capacity and as Chief Executive Officer, Anita Group of Companies Inc, Anthony Saytue, in your personal capacity and as Manager, Anita Mining Group, Praise Farley, Edwin Kai, JoyceSawyer, Susannah Nollen, Catherine Satia, Boyd Wah, Gertrude Daye, Jartu Tamba, Comfort Saye, Thelma Fanta Kromah, Socrate Weah, Kokulo S. Dorbor, Gayflor Y. Mulbah, Jones Hinneh, Johnson Sumo, Rev. Fallo Fallah, Mohammed Toure, Sophie Petter, Satia NY, Decontee Harris, Julian Wiah, Theo Nagbe, Samuel M. Barrain, Benson T. Wion, Benjimin T. Lathrobe, Seth A. Togba, Miller K. Sumo, Victor Kar, all believed to be staffs of the Anita Group of companies through its subsidiary, Anita Business Center; Thelma Ducan Sawyer, Deputy Minister for Administration of the Ministry of Foreign Affairs (MOFA), and others be identified, did conspire, connive, facilitate and did commit the Crime of Money Laundering in flagrant violation of 4 LCLR, Title 26, Section 15.2.1 (a), (b) (c) and (f), 4LCLR, Title 26, Section 15. 2.2 (1), and (a); and 4 LCLR, Title 26, Section 2.2 (a) and (b); and 4 LCLR, Title 26, Section 15.6 (a), (b), (e), (g)and (k); and 4 LCLR, Title 26, Section 15.54, of the Statutory Law of the Republic of Liberia; a felony of the first degree to wit:

1.That, between the time interval of A.D. 2018, up to and including January 22, A. D. 2024, in City of Monrovia, Montserrado County and in the bailiwick of the Republic of Liberia, you Co-Defendant Nora Finda Bundoo, at the time, a politically Exposed person (PEP), connived, colluded and conspired with Co-Defendants Emmanuel Kollie, in your personal capacity and as General Manager of Anita Business Center, Jimmy Emmanuel Flomo, in your personal capacity and as Manager of Anita Business Center, Anthony Saytue, in your personal capacity and as Manager, Anita Mining and Agriculture Development Cooperative Society, Philip Toe, in your personal capacity and as Assistant Manager, Anita Mining and Agriculture Development Cooperative Society; Anita Pamela Jallah, in your personal capacity and as Chief Executive Officer, Anita Group of Companies Inc, Anthony Saytue, in your personal capacity and as Manager, Anita Mining Group, Praise Farley, Edwin Kai, JoyceSawyer, Susannah Nollen, Catherine Satia, Boyd Wah, Gertrude Daye, Jartu Tamba, Comfort Saye, Thelma Fanta Kromah, Socrate Weah, Kokulo S. Dorbor, Gayflor Y. Mulbah, Jones Hinneh, Johnson Sumo, Rev. Fallo Fallah, Mohammed Toure, Sophie Petter, Satia NY, Decontee Harris, Julian Wiah, Theo Nagbe, Samuel M. Barrain, Benson T. Wion, Benjimin T. Lathrobe, Seth A. Togba, Miller K. Sumo, Victor Kar, all believed to be staffs of the Anita Group of companies through its subsidiary, Anita Business Center; and others to be identified. And thereafter, you Co-Defendant Nora Finda Bundoo, organized, designed and developed a criminal syndicate, with the purpose and intent to commit a crime, did do and commit the crime of Money Laundering.

2. That, in furtherance to the syndicate and orchestration, you Co-Defendant Nora Finda Bundoo, being involved into conflict of interest, onward, opens multiple accounts at Afriland First Bank Liberia Limited, including other personal and or additional accounts at LBDI, IBLL, and Access Banks respectively. With onward intent to shield, conceal and divert public attention, and with regards to your criminal involvement into multiple suspicious transactions and illicit and criminal activities in aforesaid accounts.

3.That, the accounts thereafter, paved the way, served as a conduit and or were used as medium for several transferred of monies both in and out from one account to another account, amounting to the sum of **USD$ 6,932,089.71 (Six Million Nine Hundred Thirty-Two Thousand Eighty-Nine United States Dollars Seventy-One cent) and LRD$ 871, 381, 307.19 (Eight Hundred Seven One Million Three Hundred Eighty one Thousand Three Hundred Seven Liberian Dollars Nineteen -cent),**

4.That, you the herein named Co- Defendant Nora Finda Bundoo, the for purpose the to commit the above-mentioned crime, criminally, Purposely, knowingly, willfully and intentionally used the total of Twenty-Six (26) bank accounts as listed below for which multiple circular movement of funds and or monies from both United States and Liberia Dollars, using individuals/ Co-Defendants and other corporate entities.

Account Title	Account Numbers	Currency	Bank
Nora Finda Bundoo	8216610187601-01	LRD	IB
Nora Finda Bundoo	0101384606-46	LRD	Afriland
Anita Group of Companies	0100892311-09	LRD	Afriland
Mc2 Sinoe Transfer	0100484802-45	LRD	Afriland
Mc2 Nimba Transfer	0100427202-88	LRD	Afriland
MC2 Tototal Transfer	0100888201-20	LRD	Afriland
MC2 River Cess Transfer	0100888302-08	LRD	Afriland
MC2 Gbarpolu Transfer	0100878102-53	LRD	Afriland
MC2 Grand Kru Transfer	0100672102-66	LRD	Afriland
MC2 Kolahun Transfer	0100601802-88	LRD	Afriland
MC2 River Gee	0100494902-09	LRD	Afriland
Resue and Associate Inc.	0101730708-28	LRD	Afriland
MC River Gee A/C	0100494912-76	LRD	Afriland
Nora Finda Bundoo	8218410187602-02	USD	IB
Nora Finda Bundoo	0201384606-94	USD	Afriland
Nora Finda Bundoo	02242002915-77	USD	Acess Bank
Nora Finda Bundoo	02212002625-27	USD	Acess Bank
Anita Group of Companies	0200892311-57	USD	Afriland
Anita Group of Companies	020092301-87	USD	Afriland
MC2 Tappita (Gol Salary)	100993112-52	LDR	Afriland
MC2Tappitta Transfer	100993101-85	LRD	Afriland
MC2 Tappita (Money Gram	200993101-36	USD	Afriland
MC2 Tappitta (Transfer Account)	200993103-30	USD	Afriland
MC2 Tappita (Ccion Account)	200993177-02	USD	Afriland

5.That, Defendants' Nora Finda Bundoo, while serving within the employ of the Government of the Republic of Liberia; in the capacity as Chief of Protocol, overlapped and misused said Governmental functions. Hence, connived with Co-defendant Anita Pamala Jallah, (CEO) of Anita Group of Companies with its

...AL CIRCUIT, CRIMINAL C... OF LIBERIA,

subsidiary "Gracious Ride. That Anita Group of Companies operated directly under the instruction, supervision and consent of You Co-Defendant Nora Finda Bundoo.

6. That, Gracious Ride as subsidiary branch of Anita Group of Companies was headed by You Co- Defendant, Francis T. Blamo, while both Co-Defendants Emmanuel Kollie, and Alex Jackson, served as managers, respectively for Anita Business Center, while Anthony Saytue, in your personal capacity and as Manager, Anita Mining and Agriculture Development Cooperative Society, Philip Toe, in your personal capacity and as Assistant Manager, Anita Mining and Agriculture Development Cooperative Society, were carrying on Mining activities in Tartu ken, River-Gee County. That, having connived and established said companies, under a criminal scheme and intent, placed Co-Defendant Anita Pamela Jallah, who is believed to be your biological daughter as chief executive officer with 100% as shareholder.

7. That, from indications and analyst, AREPT investigation revealed that, You Co-Defendant Nora Finda Bundoo, was not an Incorporator nor a shareholder of Anita Group of Companies, by virtues of the entity's Articles of Incorporation registered on the 27th day of the month of July A.D. 2021, as per the records from Liberia Business Registry Office and or by any Board resolution neither or authorization. Instead, the herein named Co-Defendant, suspiciously acted as authorized representative of said entity and subsequently opened and used the below listed accounts as mentioned, to serve as criminal medium in the illicit money activities, constituting the commission of the crime of money laundering crime.

Accounts Numbers	Bank	Currency
0100-892-311-09	Afriland	LRD$
0200-892-301- 87	Afriland	USD$
0200-892-312-54	Afriland	USD$
0200-892-311-57	Afriland	USD$

9. That, these accounts above mentioned, were opened on the 14th day of the month of July A.D. 2014, prior to and contrary to the registration date of Anita Group Companies Articles of Incorporation mentioned above. Additionally, investigation report established that, instead of You Co-Defendant Nora Finda Bundoo to use her personal information to include telephone numbers on the account's records, criminally and intentionally used the following telephone numbers as reflected on the accounts' records from Afriland Bank Liberia Limited.

Name of owners	Addresses	Numbers
Koryon Sheriff		0776-339-710
Undisclosed Name		0880-495-457
Undisclosed Name		0886-151-818
Undisclosed Name		0779200200

10. That, investigation also established that, prior to You Co-Defendant Nora Finda Bundoo, appointment in A.D. 2018, You had an account with Access Bank Liberia Limited, with account#0224-200-291-5-77. Accordingly, this account had the sum of USD$7,897.00, credited as a loan on the 22nd of July A.D. 2011, in the same token, said account was left with zero bank balance. On the other hand, herein named Co-Defendant also had another account at International Bank Liberia Limited (IBLL), with account # 008-218-410-187-602-02.

11. In furtherance, AREPT investigation uncovered that, the International Bank Liberia Limited account as slated had a bank balance of USD$ 30,017.46 (Thirty

Thousand Seventeen United States Dollars Forty-Six cents), as of December 30, A.D. 2017. Investigation established further that, while serving in the Chief Protocol position between the period of A.D. 2018, up to and including January 22, A.D. 2024, You Co-Defendant received a monthly Governmental salary of USD$4,343.80 (Four Thousand Three Hundred Forty-Three United States Dollars Eighty Cent). Which amounted to the total of USD$312,753.6 (Three Hundred Twelve Thousand Seven Hundred Thirty-Three United States Dollars, six cent), for the period of Six (6) calendar years and or Seventy-Two (72) months.

12. In the same vein, AREPT investigation established that, prior to You Co-Defendant Nora Finda Bundoo, involvement into suspicious and illicit transactions in all accounts, leading to the money laundering crime, your Six (6) years salary of USD$312,753.6, including closing bank balance as mentioned in the Two (2) separate accounts as of December 30, A.D. 2017, is total as USD$334,874.2 (Three Hundred Thirty-Four Thousand Eight Hundred Seventy-Four Unted States Dollars Two-cent). And the total of LRD$701,099.29 (Seven Hundred One Thousand Ninety-Nine Dollars Twenty-Nine Cent), from the Co-Defendants' IB Liberian Dollars with account Numbers of ;008-216-610-187-601, as of December 30, A.D. 2017.

13. More besides, the herein named You Co-Defendant, misused your official position and therefrom, colluded and connived with Co- Defendants, Praise Fairley, Jimmy Emmanuel Flomo, Joyce Sawyer, Gayflor Y. Mulbah, Jartu Tamba, Jartu Nagbe, Rev. Fallo Fallah, Socrate Weah, Welleh Toe, Jones Hinneh, Johnson Sumo, Susannah Nollen and others to be identified, to carry out various monies' transaction in account#: **0100-892-311-09 a Liberian dollars account at Afriland Bank** own and operated by the Anita Group of Companies. That; transaction done in aforesaid account as mentioned were done during the period of A.D. 2018, up to and including January 22, A.D. 2024, with the intent to deprive the Republic aforesaid.

14. That, the below chat indicates complete transferred, transactions both debits and credits in huge sum by the above named Co-Defendants and others to be identified, amounting to the total of LRD$845,210,457.19 (Eight Hundred Forty Five Million Two Hundred Ten Thousand Four Hundred Fifty Seven Liberian Dollars Nineteen-Cent as credit) and Debited LRD$ LRD$848,229,330.00 (Eight Hundred Forty Eight Million Two Hundred Twenty Nine Thousand Three Hundred Thirty Liberian Dollars) in the account herein supra.

Defendant's Name	Date of Transaction	Total Debit	Total Credit/Deposit
Nora Finda Bundoo	20/6/2019-13/5/2020	LRD$555,449,900 .00	LRD$399,525,977.19
Praise Farley	2/12/2022-24/11/2023	N/N	LRD$115,103,160.00
Gayflor Y. Mulbah	8/10/2022-24/11/2022	N/N	LRD$30,529,835.00
Rev, Fallo Fallah	10/10/2022-7/11/2022	N/N	LRD$15,032,600.00
Jartu Tamba	17/10/2022-29/12/2022	LRD$5,504,060.0 0	LRD$98,609,980.00
Socrates Weah	4/11/2022-11/3/2023	LRD$40,653,845. 00	N/N

Jones Hinneh	2/200/9/2022-1/12/2022	LRD$15,949,100.00	N/N
Joyce W, Sawyer	31/8/2023-2/10.2023	N/N	LRD$78,553,950.00
Johnson Sumo	20/10/2022-6/3/2023	LRD$5,000,000.00	LRD$8,061,160.00
Susannah Nollen	23/11/2022-21/01/2023	LRD$16,287,755.00	N/N
Benson T. Wion	15/12/2022	LRD$3,130,070.00	N/N
Seth A. Togbe	18/8/2023-23/8/2023	N/N	LRD$4,519,500.00
Matherline Y. Seth	19/9/2023	LRD$3,500,000.00	N/N
Jimmy E. Flomo	20/12/2022-5/7/2023	LRD$91,055,500.00	LRD$4,338,000.00
Kokulo S. Dorbor	21/9/2023- 15/9/2023	LRD$6,500,000.00	N/N
Philip Toe	30/1/2023	LRD$775,000.00	N/N
Miller K. Sumo, Jr	10/7/2023	N/N	LRD$4,299,060.00
Angeline W. Zeagbe	6/10/2023	LRD$1,000,000.00	N/N
Mohammed Toure	11/8/2022	N/N	LRD$492,650.00
Sophie Peters	22/8/2022	N/N	LRD$4,000.00
Samul M Barrain	21/9/2023	LRD$1,565,000.00	N/N
Julian Wiah	5/3/2023	LRD$1,030,000.00	N/N
Jartu Nagbe	24/10/2022	N/N	LRD$5,624,000.00
Welleh Toe	16/12023-6/4/2023	N/N	USD$960,000.00
Theo Nagbe	24/10/2022	N/N	LRDS1,738,755.00
Comfort Yeah Saye	12/10/2022-28/8/2023	LRD$100,000,000.00	LRD$77,817,830.00
Grand	**Total**	**LRD$848,229,330.00**	**LRD$845,210,457.19**

15. In Addition, between the periods of January 4, A.D. 2020, up to and including July 17. A.D. 2023, from the money laundering's proceeds, You Co-Defendant Nora Finda Bundoo carried out several transactions and or debited to T.R. H, Trading Corporation Inc, in account,0100-892-311-09, totaling the sum of LRD$381,000,000.00 (Three Hundred Eighty-One Million Liberian Dollars) as mentioned in the sum total of the below chart.

Date of Transaction	Description/	Amount LD$
4/01/2020	TRF ORDER#00027126	20,500,000.00
13/2/2020	,, ,, ,, 00028279	36,000,000.00
2/4/2020	,, ,, ,, 00029710	28,000,000.00

3/4/2020	,, ,, ,,000315750	15,000,000.00
1/8/2020	,, ,, ,,00031578	15,000,000.00
11/6/2020	,, ,, ,,00032566	15,000,000.00
24/7/2020	,, ,, ,, 00029710	15,000,000.00
14/8/2020	,, ,, ,, 00034193	8,000,000.00
4/2/2021	,, ,, ,,00038297	15,000,000.00
8/4/2021	,, ,, ,,00039571	12,000,000.00
27/9/2021	,, ,, ,,00043305	30,000,000.00
23/8/2022	,, ,, ,, 00051087	38,000,000.00
12/1/2023	‘,, ,, ,, 00054099	77,500,000.00
17/7/2023	,, ,, ,, 00058252	55,500,000.00
Grand Total	N/N	LRDS381,000,000.00

16. That, AREPT investigation unearthed with respect to several debits in account #0100-892-311-09, own and belonging to Co-Defendants Anita Pamelia Jallah and Nora Finda Bundoo, in the amount of LRD$101,286, 910.22 (One Hundred One Million, Two Hundred Eighty-Six, Nine Hundred Ten Liberian Dollars Twenty-two cents) in the aforesaid chart mentioned below:

Transaction Date	Check encashed	Amount LD$
7/21/2021	ChKS #0002298	5,700,473.53
7/12/2021	,, ,, ,,00000297	5,080,980.06
7/12/2021	,, ,, ,,00000299	5,698,473.01
21/12/2021	,, ,, ,,	5,699,473.27
25/3/2023	,, ,, ,,00232255	4,967,991.71
22/6/2022	,, ,, ,,00001225	19,971,116.97
28/20/2022	,, ,, ,, 00001643	20,605,288.70
8/8/2022	,, ,, ,,00001309	4,991,751.48
24/3/2023	,, ,, ,,00024896	1.556,616.42
28/3/2023	,, ,, ,,00244902	5,172,205.47
4/4/2023	,, ,, ,,00023934	5,156,539.04
21/6/2023	,, ,, ,, 00244823	16,685,999.93
Grand Total	N/N	LD$99,730,393.17

18. That, Co-Defendant Praise Farley to be identified, carried out several huge deposit into Anita Group of Companies' account as mentioned below, amounting to LRD$115,103,160.00 (One Hundred Fifteen Million, One Hundred Three Thousand One Hundred Sixty Liberian Dollars), between the period of December 2, A.D. 2022, up to and including November 24, A.D. 2023, as indicated in the chart below;

Transaction Date	Depositor's	Amount LD$
2/12/2022	PRAISE FARLEY	660,800.00
2/12/2022	PRAISE FARLEY	1,902,920.00
6/12/2022	PRAISE FARLEY	476,000.00
6/12/2022	PRAISE FARLEY	1,608,500.00
12/4/2023	PRAISE FARLEY	197,990.00
24/4/2023	PRAISE FARLEY	211,200.00
2/5/2023	PRAISE FARLEY	212,900.00
9/5/2023	PRAISE FARLEY	148,240.00
17/5/2023	PRAISE FARLEY	169,550.00
22/5/2023	PRAISE FARLEY	260,480,00
24/5/2023	PRAISE FARLEY	238,370.00

29/5/2023	PRAISE FARLEY	204,300.00
2/6/2023	PRAISE FARLEY	261,500.00
8/6/2023	PRAISE FARLEY	216,050.00
8/6/2023	PRAISE FARLEY	137,700.00
10/6/2023	PRAISE FARLEY	350,500.00
15/6/2023	PRAISE FARLEY	350,500.00
15/6/2023	PRAISE FARLEY	244,950.00
16/6/2023	PRAISE FARLEY	882,700.00
16/6/2023	PRAISE FARLEY	529,700.00
17/6/2023	PRAISE FARLEY	277,350.00
19/6/2023	PRAISE FARLEY	1,134,000.00
19/6/2023	PRAISE FARLEY	310,000.00
21/6/2023	PRAISE FARLEY	424,000.00
21/6/2023	PRAISE FARLEY	1,837,920.00
23/6/2023	PRAISE FARLEY	1,041,460.00
23/6/2023	PRAISE FARLEY	1,817,700.00
28/6/2023	PRAISE FARLEY	5,474,600.00
3/7/2023	PRAISE FARLEY	25,000.00
3/7/2023	PRAISE FARLEY	628,700.00
3/7/2023	PRAISE FARLEY	5,375,110.00
5/7/2023	PRAISE FARLEY	3,000,000.00
5/7/2023	PRAISE FARLEY	2,153,800.00
8/7/2023	PRAISE FARLEY	25,000.00
8/7/2023	PRAISE FARLEY	5,400,030.00
12/7/2023	PRAISE FARLEY	1,050,300.00
12/7/2023	PRAISE FARLEY	2,642,800,00
19/7/2023	PRAISE FARLEY	37,600.00
27/7/2023	PRAISE FARLEY	4,979,300.00
28/7/2023	PRAISE FARLEY	838,320.00
31/7/2023	PRAISE FARLEY	345,000.00
31/7/2023	PRAISE FARLEY	10,000.00
31/9/2023	PRAISE FARLEY	644,630.00
1/8/2023	PRAISE FARLEY	3,500.00
1/8/2023	PRAISE FARLEY	982,000.00
4/8/2023	PRAISE FARLEY	578,790.00
7/8/2023	PRAISE FARLEY	3,459,500.00
15/8/2023	PRAISE FARLEY	1,645,000.00
15/8/2023	PRAISE FARLEY	3,912,060,00
25/8/2023	PRAISE FARLEY	30,000.00
4/9/2023	PRAISE FARLEY	868,650.00
5/9/2023	PRAISE FARLEY	30,000.00
11/9/2023	PRAISE FARLEY	3,000,000,00
11/9/2023	PRAISE FARLEY	2,812,090.00
13/9/2023	PRAISE FARLEY	2,000,000,00
13/9/2023	PRAISE FARLEY	2,453,000.00
14/9/2023	PRAISE FARLEY	155,000.00
14/9/2023	PRAISE FARLEY	994,600.00
18/9/2023	PRAISE FARLEY	1,373,500.00
18/9/2023	PRAISE FARLEY	61,000.00
18/9/2023	PRAISE FARLEY	20,000.00
21/9/2023	PRAISE FARLEY	2,600,000.00
21/9/2023	PRAISE FARLEY	1,236,000.00

29/5/2023	PRAISE FARLEY	204,300.00
2/6/2023	PRAISE FARLEY	261,500.00
8/6/2023	PRAISE FARLEY	216,050.00
8/6/2023	PRAISE FARLEY	137,700.00
10/6/2023	PRAISE FARLEY	350,500.00
15/6/2023	PRAISE FARLEY	350,500.00
15/6/2023	PRAISE FARLEY	244,950.00
16/6/2023	PRAISE FARLEY	882,700.00
16/6/2023	PRAISE FARLEY	529,700.00
17/6/2023	PRAISE FARLEY	277,350.00
19/6/2023	PRAISE FARLEY	1,134,000.00
19/6/2023	PRAISE FARLEY	310,000.00
21/6/2023	PRAISE FARLEY	424,000.00
21/6/2023	PRAISE FARLEY	1,837,920.00
23/6/2023	PRAISE FARLEY	1,041,460.00
23/6/2023	PRAISE FARLEY	1,817,700.00
28/6/2023	PRAISE FARLEY	5,474,600.00
3/7/2023	PRAISE FARLEY	25,000.00
3/7/2023	PRAISE FARLEY	628,700.00
3/7/2023	PRAISE FARLEY	5,375,110.00
5/7/2023	PRAISE FARLEY	3,000,000.00
5/7/2023	PRAISE FARLEY	2,153,800.00
8/7/2023	PRAISE FARLEY	25,000.00
8/7/2023	PRAISE FARLEY	5,400,030.00
12/7/2023	PRAISE FARLEY	1,050,300.00
12/7/2023	PRAISE FARLEY	2,642,800,00
19/7/2023	PRAISE FARLEY	37,600.00
27/7/2023	PRAISE FARLEY	4,979,300.00
28/7/2023	PRAISE FARLEY	838,320.00
31/7/2023	PRAISE FARLEY	345,000.00
31/7/2023	PRAISE FARLEY	10,000.00
31/9/2023	PRAISE FARLEY	644,630.00
1/8/2023	PRAISE FARLEY	3,500.00
1/8/2023	PRAISE FARLEY	982,000.00
4/8/2023	PRAISE FARLEY	578,790.00
7/8/2023	PRAISE FARLEY	3,459,500.00
15/8/2023	PRAISE FARLEY	1,645,000.00
15/8/2023	PRAISE FARLEY	3,912,060,00
25/8/2023	PRAISE FARLEY	30,000.00
4/9/2023	PRAISE FARLEY	868,650.00
5/9/2023	PRAISE FARLEY	30,000.00
11/9/2023	PRAISE FARLEY	3,000,000,00
11/9/2023	PRAISE FARLEY	2,812,090.00
13/9/2023	PRAISE FARLEY	2,000,000,00
13/9/2023	PRAISE FARLEY	2,453,000.00
14/9/2023	PRAISE FARLEY	155,000.00
14/9/2023	PRAISE FARLEY	994,600.00
18/9/2023	PRAISE FARLEY	1,373,500.00
18/9/2023	PRAISE FARLEY	61,000.00
18/9/2023	PRAISE FARLEY	20,000.00
21/9/2023	PRAISE FARLEY	2,600,000.00
21/9/2023	PRAISE FARLEY	1,236,000.00

21/9/2023	PRAISE FARLEY	15,500.00
22/9/2023	PRAISE FARLEY	25,590.00
25/9/2023	PRAISE FARLEY	155,000.00
25/9/2023	PRAISE FARLEY	60,000.00
25/9/2023	PRAISE FARLEY	5,713,600.00
27/9/2023	PRAISE FARLEY	117,750.00
13/10/2023		2,115,000.00
13/10/2023		2,115,000.00
13/10/2023		772, 850.00
14/10/2023		835,250.00
16/10/2023		200,000.00
19/10/2-23.		2,843,500.00
19/10/2023		1,525,220.00
19/10/2023		1,503,900.00
21/10/2023		28,400.00
24/10/2023		3,840,000.00
30/10/2023		1,920,500.00
30/10/2023		2,880,000.00
6/11/2023		77,100.00
6/11/2023		3,068,000.00
10/11/2023		105,000.00
11/11/2023		2,247,340.00
17/11/2023		2,573,200.00
22/11/2023		137,300.00
22/11/2023		212,450.00
24/11/2023		500,000.00
Grand Total	N/N	LRD$115.103,160.00

19. That, in the same Anita Group of Companies' account #0100-892-311-09 LRD$, you Co-Defendant Gayflor Mulbah, between the period of October 10, A.D. 2022, up to and including November 28, A.D. 2022, carried out huge suspicious deposits, which amounted to LDR$30,835, 835.00 (Thirty Million, Five Hundred Twenty-Nine Thousand Eight Hundred Thirty-Five Liberian Dollars), as indicated herein below:

Date of Transaction	Depositor's/Gayflor Mulbah	Amount LDR$
8/10/2022	Gayflor Mulbah	2,314,925.00
10/10/2022		2,883,700.00
11/10/2022		5,710,800.00
13/10/2022		2,436,400.00
17/10/2022		7,430,440.00
20/10/2022		2,735,610.00
26/10/2022		320,000.00
26/10/2022		1,647,350.00
28/10/2022		436,100.00
31/10/2022		825,050.00
31/10/2022		449,950.00
2/11/2022		596,750.00
2/11/2022		220,800.00
24/11/2022		946,550.00
24/11/2022		9,005,850.00
Grand Total		LDR$30,529,835.00

20. That, You Co-Defendant Rev. Fallo Fallah's transaction between the period of October 10, A.D. 2022 up to including July 11, A.D. 2022 amounted to the sum of LDRS15,032,600.00 (Fifteen Million Thirty-Two Thousand Six Hundred Liberian Dollars)

Transaction date	Depositor's	Amount LD$
10/10/2022	Rev. Falloh	5,409,400.00
24/10/2022		2,000,700.00
25/10/2022		2,060,000.00
28/10/2022		2,000,000.00
4/11/2022		3,500,000.00
7/11/2022		62,500.00
Grand Total:		LD$15,032,600.00

21. That, You Co-Defendant Jartu Tamba to be identified deposited in Anita Group of Companies' account LRD$98,609,980 (Ninety-Eighty Million, Six Hundred Nine Thousand Nine Hundred Eighty Liberian Dollars) covering the period from October 17, 2022 to April 5, 2023. Again, the same defendant Jartu Tamba to be identified debited the amount of Five Million, Five Hundred Four Thousand Sixty Liberian dollars.

22. That,You Co-Defendant Socrate Weah to be identified, carried out huge transaction and or debited/withdrew from Anita Group of Companies' account the total of LRD$40,653,845.00 (Forty Million Six Hundred Fifty-Three Thousand Eight Hundred Forty-Five Liberian Dollars) covering the period November 4 AD 2022 to March 3, AD 2023 as indicated in the chart below:

Transaction Date	Check Numbers	Amount LD$
4/11/2022	CHQ,341-003	20,000,000.00
8/12/2022	CHQ362-020	10,653,845.00
11/3/2023	CHQ365-711	10,000,000.00
Grand Total		LRD$40,653,845.00

23. That, Co-Defendant Welleh Toe to be identified, transacted in the same Anita Group of Companies' account with the total deposit of the sum of LRD$960,000.00 (Nine Hundred Sixty Thousand Liberian Dollars) covering the period January 16 AD 2023 to April 6 AD 2023 as indicated in the chart below:

Transaction Date	Depositor's	Amount LD$
16/01/2023	Welleh TOE	630,000.00
6/4/2023		330,000.00
Grand Toal		LD$960,000.00

24. That, You Co-Defendant Joyce W. Sawyer to be identified transacted in the same Anita Group of Companies with the total deposit of LRD$78,553,950.00 (Seventy-Eight Million Five Hundred Fifty-Three Thousand Nine Hundred Fifty Liberian Dollars) covering the period August 31, AD 2023 to October 2, AD 2023 as indicated in the chart below:

Transaction Date	Name	Amount LD$
31/8/2023	Joyce W. Sawyer	23,065,450.00
19/9/2023	" " " " "	40,537,500.00

2/10/2023		14,951,000.00
Grand Total		**LRD$78,553,950.00**

25. That, You Co-Defendant Jones Hinneh to be identified transacted in Anita Group of Companies' account in the amount of LRD$15,949,100 (Fifteen Million Nine Hundred Forty-Nine Thousand one hundred Liberian Dollars covering the period September 20, AD 2022 to December 1, AD 2022 as indicated below:

Transaction Date	Check Numbers	Amount LD$
20/09/2022	361830	10,230,000.00
23/11/2022	347636	4,134,100.00
1/12/2022	341027	1,585,000.00
Grand Total:		LDS$15,949,100.00

26. That, You Co-Defendant Johnson Sumo to be identified deposited in Anita Group of Companies' account in the sum of LRD$8,061,160.00 (Eight Million Sixty-One Thousand One Hundred Sixty Liberian Dollars and debited LRD$5,000,000.00, during the period of October 26, A.D. 2022, to March 3, A.D.2023 LRD$13,061,160 (Thirteen Million Sixty-One Thousand One Hundred Sixty Liberian Dollars) as indicated in the chart below:

Transaction Date	Check Numbers	Amount LD$
26/10/2022	351331	5,000,000.00
27/10/2022	Deposit	7,751,160.00
6/3/2023	Deposit	310,000.00
Grand total		LD$8,061,160

27. That, You Co-Defendant Susannah Nollen to be identified debited in Anita Group of Companies' account in the amount LRD$16,287,755 (Sixteen Million Two Hundred Eighty-Seven Thousand Seven Hundred Fifty-Five Liberian Dollars) covering the period November 23 AD 2022 to January 21, AD 2023 as indicated in the chart below:

Transaction Date	Check Numbers	Amount LD$
23/11/2022	340690	10,787,755.00
21/01/2023	376358	5,500,000.00
Grand Total	N/N	LD$16,287,755.00

28. That, You Co-Defendant Benson T. Wion to be identified deposited in Anita Group of Companies' account the sum of LRD$3,130,070 (Three Million one Hundred Thirty Thousand Seventy Liberian Dollars), on December 15, A.D. 2022 as indicated below:

Transaction Date	Deposit	Amount LD$
15/12/2022	,, ,,	3,130,070.00

29. That, You Co-Defendant Seth A. Togbe to be identified did Four (4) separate deposit in the sum of LRD$4,519,500 (Four Million Five Hundred Nineteen Thousand Five Hundred Liberian Dollars), between August 18, A.D. 2023 to August 23 AD 2023 as indicated below:

Transaction Date	Deposit	Amount LD$
18/8/2023	,, ,, ,,	71,500, 00
18/8/2023	,, ,, ,,	1,532,000.00
23/8/2023	,, ,, ,,	1,400,000.00

23/8/2023	,, ,, ,,	1,516,000.00
		LD$4,519,500,00

30. That, You Co-Defendant Matherline Y. Seth to be identified: LRD$3,500,000(Three Million Five Hundred Thousand Liberian Dollars as debit) on September 19. AD 2023.

Transaction Date	Check Number	Amount LD$	
19/9/2023	CHQ # :382163	3,500,000.00	

31. That, Co- Defendant Jimmy Emmanuel Flomo, in your personal capacity and as Manager of Anita Business Center, deposited in the same Anita group of Companies' account the sum of LRD$ 4,338,000.00 (Four Million Three Hundred Thirty-Eight Thousand Liberian Dollars) plus debit in the sum of LRD$91,055,500.00 (Ninety-One Million Fifty-Five Thousand Five Hundred Liberian Dollars Fifty-Two Cent) covering the period June 20, AD 2020 to October 3, AD 2023 as indicated below:

Transaction Date	Deposit and Debit	Amount LD$
20/6/2020	,, ,, ,,	281,000.00
4/2/2021	,, ,, ,,	152,200.00
20/12/2022	CHQ#65686	3,904,800.00
3/7/2023	,, ,, 406243	5,000,000.00
5/7/2023	,, ,,379999	10,000,000.00
10/7/2023	,, ,,409935	10,000,000.00
13/7/2023	,, ,, 410001	10,000,000.00
7/9/2023	,, ,,425189	6,000,000.00
12/9/2023	,, ,,45198	55,500.00
3/10/2023	,, ,,421481	50,000,000.00
Grand Total, both Debit and Deposit		LRD$91,055,500.00 and 4,338,000.00

32. That, You Co-Defendant Kokulo s. Dorbor to be identified debited in the same Anita Group of Companies' account the sum of LDR$6,500,000 (Six Million Five Hundred Thousand Liberian Dollars) covering the period of September 21 AD 2023 to September AD, 2023 as indicated below:

Transaction Date	Description/Check #	Amount LD$
21/9/2023	CHQ#410043	1,000,000.00
4/10/2023	,, ,, ,, 390408	2,000,000.00
15/9/ 2023	TRF Order	3,500,000.00
Total	N/N	LD$6,500,000.00

34. Defendant's Philip Toe to be identified debited in the same Anita Group of Companies' account the sum of LRD$775,000.00 on January 30, AD 2023.

Date of Transaction	Description/Check#	Amount LD$
30/1/2023	Check#341039	775,000.00

35. That, You Co-Defendant Miller K. Sumo, Jr, deposited in Anita Group of Companies' account the sum of LRD$4,299,060.00 (Four Million Two Hundred Ninety-Nine Thousand Sixty Liberian Dollars) on July 10, A.D. 2023.

Date of Transaction	Description	Amount LRD$
10/7/2023	Deposit	4,299, 060.00

36. That, You Co-Defendant Angeline W. Zeagbe to be identified debited in the same Anita Group of Companies' account the sum LRD$1,000,000.00 (One Million Liberian Dollars) during the period of June 10, A.D. 2023 as indicated below:

Date of Transaction	Description	Amount LRD$
6/10/2023	CK#405121	1,000,000.00

37. That, You Co-Defendant Sophie Peter to be identified deposited in the same Anita Group of Companies' account in the sum of LRD$4,000.00 (Four Thousand Liberian Dollars), August 22, A.D. 2022. That, Defendant Mohammed Toure also deposited LRD$492,650.00 (Four Hundred Ninety-Two Thousand Six Hundred Fifty Liberian Dollars),

38.That, between the period of October 12, A.D. 2022, up to and including August 28, A.D. 2023, you Co-Defendant Comfort Saye to be identified, carried out several transactions both deposits and debits, in the amount of LRD$77,817,830 (Seventy-Seven Eighty Hundred Seventeen Thousand Eight Hundred Thirty as deposit), and debited LDR$55,000,000.00 (Fifty-Five Million Liberian Dollars) all in the same Anita Group of Companies' account as indicated below:

Date of Transaction	Debit and Credit	Amount LRD$
12/10/2022		5,536,550.00
12/10/2022		2,695,750.00
26/10/2022		11,593,550.00
29/10/2022	CHQ#432933	50,000,000.00
15/08/2023		57,991,980.00
28/8/2023	CHQ#432932	50,000,000.00
Grand total		LRD$55,000,000.00 as debit, plus 77,817,830.00

39. That, You Co-Defendant Samuel M. Barrain to be identified debited from Anita Group of Companies' account the sum of LRD$1,565,000,00 (One Million Five Hundred Sixty-Five Thousand Liberian Dollars) on September 21, A.D. 2023. while Jartu Nagbe also deposited LRD$5, 624,000.00 (Five Million Six Hundred Twenty-Four Thousand Liberian Dollars). Additionally, Defendant's Julian Wiah, carried out two (2) separates debit in the amount of LDR$1,030,000.00, on May 3, A.D. 2023, respectively.

40. That, in gross violation of the Money Laundering act and or law, You Co-Defendant Nora Finda Bundoo, criminally, intentionally and willfully connived with Co-Defendants, Praise Fairley, Comfort Saye, Gayflor Y. Mulbah, Dennis Re, Kokulo S. Dorbor, Tokpa Ma, Decontee Harris and carried out numerous money transaction to include Debit and Credit in Anita Group of Companies United States Dollars' account at Afriland Bank #**020089211-57**.

41. That, the total debits done in the account as mentioned in Anita Group of Companies' account is USD$2,599,300 (Two Million Five Hundred Ninety-Nine Thousand Three Hundred United States Dollars) and USD$2,445,741.60 (Two Million Four Hundred Forty-Five Thousand Seven Hundred Forty-One United States Dollars Sixty-Cent, as deposit) and the same herein account had a total debit of the sum of USD$2,599,300.00 as indicated in the chart below:

Defendant's Name	Date of Transaction	Debit	Credit/Deposit
Nora Finda Bundoo	20/10/2019-3/8/2023	USD$2,287,400	USD$1,903,760.6
Praise Farley	12/2/2022-30/10/2023	N/N	USD$19,067.00
Gayflor Mulbah	20/102022-24/11/2022	N/N	USD$7,983.00
Decontee Harris	3/11/2021	N/N	USD$149,900.00
Morning	7/11/2022-12/1/2023	USD$74,000.00	N/N
Emmanuel	22/7/2022-7/10/2022	N/N	USD$9,880.00
Comfort Saye	11/10/2022-30/12/2022	USD$12,000.00	USD$24,351.00
Mohammed Sesay	19/7/2023	UDS$10,000.00	USD$10,000.00
Tolbert	2/6/2022-15/6/2022	UDS$120,000.00	N/N
Cherish S.	10/8/2022	UDS$50,000.00	N/N
Sheriff A	15/2/2022-28/2/2023	USDS5,000.00	USD$200.00
Thelma Fanta Kromah	27/1/2022-6/1/2024	UDS$26,900.00	N/N
Tokpa Ma	11/7/2022	USD$5,000.00	N/N
Dennis Re	30/6/2022	N/N	USD$200.00
Kokulo S. Dorbor	4/10/2023	USD$1,000.00	N/N
Cummings	30/6/2022	N/N	UDS$300.00
Satia Ny	30/6/2022	N/N	USD$300.00
Jimmy E. Flomo	20/9/2019-12/9/2023	USD$8,000.00	USD$319,800.00
Grand Total	**N/n**	**USD$2,599,300**	**USD$2,445,741.60**

42.Additionally, You Co-Defendant Nora Finda Bundoo, made several transfer orders in favor of JICHI Trading Company on 28th day of the July, A.D. 2023, in the sum of USD$36,000.00 (Thirty-Six Thousand United Dollars), including four (4) different deposits between the period March 18, A.D. 2022 to January 1, A.D. 2023, to MC2 RIVER-GEE, purported account in the amount USD$54,000 (Fifty-Four Thousand United States Dollars).

43. That, AREPT investigation revealed that account number 0200892311-57 belonging to You Co-defendant Nora Finda Bundoo had a total credit in encashed checks and transfer of the total of USD One Million, Six Hundred Thirty-Three Thousand Four Hundred Forty United States Dollars (US$1,633,440.06) Six cents while the debit in the same account# USD$020089211-57 amounted to

USD$164,000.00 (One Hundred Sixty Four Thousand United States Dollars) respectively as showed in the below chart between the period of January 26, A.D. 20221 to and including June 21, A.D. 2023.

Date of Transaction	Checks Number	Amount USD$:
10/2/2021	CHQ#00394981	2,500.00
10/2/2021	,, ,, ,,00394979	2,500.00
10/2/2021	,, ,, ,,00394983	2,500.00
10/2/2021	,, ,, ,,00394987	2,500.00
10/2/2021	,, ,, ,,00394984	2,500.00
10/2/2021	,, ,, ,,00394985	2,500.00
10/2/2021	,, ,, ,,00394984	2,500.00
10/2/2021	,, ,, ,,00394985	2,500.00
102/2021	,, ,, ,,00394986	2,500.00
10/2/2021	,, ,, ,,00394982	2,500.00
10/2/2021	,, ,, ,,00394980	2,500.00
8/6/2021	,, ,, ,,00000438	320,000.00
1/7/2021	,, ,, ,,00270386	240,000.00
7/12/2021	,, ,, ,, 00000154	50,012.93
7/12/2021	,, ,, ,,00000157	50,012.93
7/12/2021	,, ,, ,,0000155	50,012.93
7/12/2021	,, ,, ,,00000156	50,012.93
1/2/2022	,, ,, ,,00000826	51,093.50
22/6/2022	,, ,, ,,00000283	197,655.55
25/7/2022	,, ,, ,, 00000346	49,406.98
29/12/2022	Anita Group	12,000.00
8/8/2022	0000425	49406.93
21/6/2023	00396182	115.325.33
10/1/2023	00054074	10,000.00
26/01/2023	00054283	20,000.00
14/03/2023	00055565	3,000.00
21/06/2023	05557681	164,000.00
Grand Total Debit and Credit	N/N	USD$164,000.00 plusUSD$1,633,440.06

44. That, You Co-Defendant Nora Finda Bundoo, again issued other transfer orders both debit and credit in the amount of USD$598,800.00(debit) and USD$90,000.00 (Credit), as indicated in the chart below as referred to non-customers for the purpose to clean illicit monies between the period June 3, AD 2021 to June 6, AD 2022.

Date of Transaction	Transferred Order #	Amount USD$
3/6/2021	TRF Order#00040950	226,800.00
31/8/2021	,, ,, ,, 00042839	82,200.00
30/9/2021	,, ,, ,,00043382	49,800.00
3/11/2021	,, ,, ,,00044301	150,000.00
24/3/2021	,, ,, ,, 00055565	3,000.00

7/9/2022	,, ,, ,, 00049403	500.00
6/6/2022	00043205	4,250.00
	00049403	,90,000.00

45, That, Further investigation reports revealed that You Co-Defendant Praise Farley to be identified, carried out several transactions in the same Anita Group of Companies' account #020089211-57, between the period of February 12, A.D. 2022, up to including October 10, A.D.2023, you herein named Defendant deposited the sum USD$19,067.00 (Nineteen Thousand Sixty-Seven United States Dollars).

46. That, You Co-Defendant Gayflor Y. Mulbah to be identified, also appeared in the same Anita Group of Companies' account #020089211-57; with several transactions between the period of October 10, A.D. 2022, up to and including November 24, A.D.2022, in the sum of USD7,983.00 (Seven Thousand Nine Hundred Eighty-Three United States Dollars).

47. That, You Co- Defendant Comfort Saye to be identified, also transacted in the same Anita Group of Companies' account# 020089211-57, during the time interval of October 11, A.D. 2022, up to and including December 3, A.D. 2022, both and credit in the sum of USD$12,000.00 (Twelve Thousand United States, as debit and USD$24,351,00 Twenty-Four Thousand Three Hundred Fifty-One United States Dollars) also as credit).

48. That, You Co-Defendant Tolbert to be identified, debited in the same Anita Group of Companies' account totaling the amount of USD120,000.00 (One Hundred Twenty Thousand United States Dollars), during the period of June 2, A.D. 2022, up to and including June 15, A.D. 2022 as indicated in the chart below:

Date of Transaction	Transferred Order	Amount USD$
2/6/2022	TRF Order#00049332	30,000.00
15/6/2022	,, ,, ,, , ,00049637	90,000.00
Grand Total	N/N	USD$120,000.00

49. That, on the 11th day of the month of March A.D. 2021, You Co-Defendant Decontee Harris to be identified, also transacted in the same Anita Group of Companies' account# 020089211-57, by depositing the sum of USD$149,900.00 (One Hundred Forty-Nine Thousand Nine Hundred United Sates Dollars) into said account.

50.That, You Co-Defendant Thelma Fanta Kromah to be identified, on January 27, A.D. 2023, and January 6, 2024 respectively, did and or carried out two (2) separates transactions in Anita Group of Companies' account#020089211-57 in the total of USD$26,900.00 (Twenty-Six Thousand Nine Hundred United States Dollars). While Co-Defendant Cherish to be identified did one (1) transaction in the sum USD$50,000.00

Date of Transaction	Depositor/Check	Amount USD$
27/1/2022	CHQ#362201	20,000.00
6/1/2023	Deposit	6,900.00
Grand Total	N/N	USD$26,000.00
Date of Transaction	Def. Cherish	Amount USD$
10/8/2022	CHQ#00050889	50,000.00

51. That, during the period of July 11, A.D. 2022, You Co-Defendant Tokpa Ma to be identified, debited in the same Anita Group of Companies' account which amounted to USD$5,000.00, Defendant's Kokulo Dorbor debited in the sum of USD$1,000.00. At the same time, Defendant Sheriff A to be identified debited USD$5,000.00 and credited of USD$200.00

52. That, in Anita Group of Companies' account #020089211-57, You Co-Defendant Jimmy Emmanuel Flomo, in your personal capacity and as Manager of Anita Business Center, carried out both debit and credit in the aforesaid account, between September 20, A.D. 2019, to up and including June 20, A.D. 2020, with USD$319,800.00 (Three Hundred Nineteen Thousand Eight Hundred United Sates Dollars as credit and USD$800.00 (Eight Hundred United States Dollars), as debit also.

53. That, You Co-defendant Moring to be identified, between the period of November 7, A.D. 2022 up to and including January 12, A.D. 2023, debited USD$74,000.00 (Seventy-Four Thousand United States Dollars), in the same account Anita Group of Companies' account. More besides, You Co-Defendant Emmanuel J, to be identified did two different deposits. In July A.D. 2022 and October 7, A.D. 2022, amounting to USD$9,880.00 (Nine Thousand Eight Hundred Eighty United Dollars) respectively. And that, You Co-Defendant Morning to be identified, debited in the same Anita Group of Companies' account the sum of USD$74,000.00 (Seventy-Four Thousand United States Dollars) while You Co-Defendant Mohammed Sesay, also in the same Anita Group companies' account debited USD$10,000.00 and the same amount of USD10,000.00 as credit on the same date, July 19, 2023.

54. That, in Anita Group of Companies' account# 0200892312-54 (USD), You Co-Defendants, Nora Finda Bundoo, Benjamin T. Lathrobe, Anthony F. Saytue, Jimmy Emmanuel Flomo, Boyd Wah, Dono God, Satiah Ny, Cummings, Robertson, Wayne Am, Anderson, Dennis Re, Yankey A, Sheriff A, Morning V, to be identified, carried in and out numerous transactions and or transferred in the aforesaid account mentioned herein. That, the total transaction, both debit and credit/deposit in account#0200892-312-54, is USD$82,950.00 (Eighty-Two Thousand Nine Hundred Fifty United States Dollars as debit) plus US$89,600.00 (Eighty-Nine Thousand Six Hundred United Staes Dollars) as credits covering the period September 17, Ad 2021 to and including January 23, AD 2023 as indicated below.

Defendant's Name	Date of Transaction	Total Debit	Total Credit/Deposit
Nora Finda Bundoo	17/9/2021-24/3/2023	USD$9, 250.00	USD$3,000.00
Anthony F. Saytue	7/7/2020-11/1/2021	N/N	USD$36,200.00
Satiah Ny	19/8/2021-28/7/2023	USD$5,000.00	USD$7,200.00
Cummings	19/8/2021-14/3/2023	USD$5,000.00	USD$4,500.00
Robertson	21/9/2021-22/12/2022	USD$5,000.00	USD$3,000.00
Wayne An	19/8/2021-24/3/2023	USD$15,000.00	USD$5,000.00

Boyd Wah	21/9/2021-22/12/2022	USD$3,500.00	USD$4,000.00
Anderson	21/9/2022-28/7/2023	USD$5,000.00	USD$5,000.00
Dennis Re	22/9/2021-13/7/2023	USD$3,500.00	USD$3,300.00
Yankey A	22/9/2021-22/12/2022	USD$3,500.00	USD$2,200.00
Sheriff A	6/4/2022-14/3/2023	N/N	USD$2,400.00
Dono God	28/5/2022-30/6/2022	USD$9,500.00	N/N
Morris V.	29/8/2022-14/3/2023	N/N	USD$1,800.00
Jimmy E. Flomo	12/1/2022-22/1/2022	USD$5,000.00	N/N
Victor T.P. Kar	14/9/2020	N/N	USD$4,000.00
Kokulo S. Dorbor	21/9/2023	USD$5,200.00	N/N
Benjamin Lathrobe	1/5/2024	N/N	USD$8,000.00
Morning	27/12/2022	USD$6,000.00	N/N
Susannah Nollen	23/1/2023	USD$2,500.00	N/N
Grand Total	**N/N**	**USD82,950.00**	**US$89,600.00**

55. That, You Co-Defendant Anthony Saytue, Manager, Anita Mining and Agriculture Development Cooperative Society, Transactions in Anita Group of Companies' account 0200892312-54(USD), deposited the amount of USD$36,200.00 (Thirty-Six Thousand Two Hundred United States Dollars) covering the period July 7, AD 2020 to October 8, AD 2021 as indicated below:

Date of Transaction	Depositor's Anthony Saytue	Amount USD$
7/7/2020	,, ,, ,, ,, ,, ,,	3,500.00
28/7/2020	,, ,, ,, ,, ,, ,,	4,150.00
4/8/2020	,, ,, ,, ,, ,, ,,	550.00
21/9/2020	,, ,, ,, ,, ,, ,,	3,500.00
2/10/2020	,, ,, ,, ,, ,, ,,	3,500.00
8/10/2020	,, ,, ,, ,, ,, ,,	3,000.00
27/10/2020	,, ,, ,, ,, ,, ,,	6,500.00
2/11/2020	,, ,, ,, ,, ,, ,,	2,5 00.00
5/1/2021	,, ,, ,, ,, ,, ,,	3,000.00
6/1/2021	,, ,, ,, ,, ,, ,,	2,000.00
11/1/2021	,, ,, ,, ,, ,, ,,	4,000.00
8/10/2021	,, ,, ,, ,, ,, ,,	**UDS$36,200.00**
Grand Total	N/N	N/N

56. That, You Co-Defendant Cummings to be identified, did several transactions in Anita Group of Companies' account between the period October 19, A.D. 2021 to March 3, A.D. 2023, both debit and credit, the amount of USD$4,500.00 (Four Thousand Five Hundred United States Dollars) as credit whereas the amount the of USD$5,000.00 (Five Hundred United States Dollars) as debit in the same account as indicated by the below chart:

Date of Transaction	Transferred Order and number	Amount USD$
19/8/2021	TRF Order#00042604	5,000.00

27/8/2021	,, ,, ,,00042704	300.00
7/10/2021	,, ,, ,, 00043649	300.00
8/12/2021	,, ,, ,, 00045143	300.00
8/12/2021	,, ,, ,,00045142	300.00
30/12/2021	,, ,, ,, 00046062	300.00
5/2/2022	,, ,, ,, 00046912	300.00
30/5/2022	,, ,, ,,00049143	300.00
22/12/2022	,, ,, ,,00053801	300.00
22/12/2022	,, ,, ,, 00053802	300.00
22/12/2022	,, ,, ,,00053803	300.00
22/12/2022	,, ,, ,,00053804	300.00
22/12/2022	,, ,, ,,00053805	300.00
22/12/2022	,, ,, ,, 00053806	300.00
14/3/2023	,, ,, ,, 00055409	300.00
Grand total	N/N	USD$9,500.00

57. That, between the period of September 21 A.D. 2021, up to and including December 22, A.D 2022, You Co-Defendant Robertson to be identified, carried out several transferred both debit and credit in the same Anita Group of Companies' account #0200892312-54, in the sum of USD$3,000.00 (Three Thousand United States Dollars as credit) USD$5,000.00 as debit, while in the commission of the crime of Money Laundering, as reflected.

58. In the same vein, You Co-Defendant Wayne An to be identified, transacted in the same Anita Group of Companies' account several times in the amount of USD$15,000.00 and credit as USD$5,000.00, during the period of October 19, A.D. 2021, up to and including March 24, A.D. 2023.

59. That, You Co-defendant Boyd Wah to be identified, was involved into several transactions both as deposit and debit in the same Anita Group of Companies' account in the sum of USD$4,000.00 as deposit and USD$3,500.00 also as credit in the same account between September 21, A.D. 2021 to December 22, A.D. 2022.

60. That, You Co-defendant Anderson to be identified, transacted in Anita Group of Companies' account both in deposit and debit between the period of September 21, A.D. 2021, up to July 28, A.D. 2023, in the sum of USD$5,000.00 as deposit and USD$5,000.00 as debit, with Co-Defendant Dennis RE to be identified, in the same category with the sum of USD$3,500.00 as debit and USD$3,300.00 as deposit.

61. That, both You Co-Defendants Yankey An in the same Anita Group of Companies' account deposited USD$2,200.00, and USD$3,500.00 as debit, while Sheriff A, to be identified transacted in the same Anita Group of Companies' account deposited USD$2,400.00 between the period of September 22, A.D. 2021, up to including March 3, A.D. 2023.

62. That, You Co-defendant Morris V to be identified deposited in Anita group of Companies' account USD$1,800.00, while Dono GoThat, d to be identified debited in Anita Group of Companies' account the sum of USD$9,500.00 between the period of May 28, A.D. 2022 to June 30, A.D. 2023. That, You Co-defendant in your personal capacity and as Manager of Anita Business Center, also appeared in the same Anita Group of Companies' account and debited US$5,000.00 between January 12, A.D. 2022 to January 22, A.D. 2022.

63. That, You Co-Defendant Benjamin T. Lathrobe to be identified, deposited in the same Anita Group of Companies' account#0200892312-54, on the 1st day of the month of May A.D. 2024, in the sum of USD$8,000.00 (Eight Thousand United States Dollars).

64. That, between the period of August 27, A.D. 2021, up to and including July 28, A.D. 2023, You Co-Defendant Satiah Ny to be identified, carried out transaction in Anita Group of Companies' account 0200892312-54, totaling the sum USD$7,200.00, as deposit and USD$5,000.00 as debit.USD$5,000.00 as debit

65. That, You Co-Defendants Susannah Nollen, Kokulo Dorbor and Moring to be identified debited from the Anita Group of Companies' account the total sum of UDS$13,700.00 (Thirteen Thousand Seven Hundred United Sates Dollars), during the period of December 27, A.D. 2022, up to January 23, A.D. 2023.

66. That, in Anita Group of Companies' account 0200892301-87, You Co-Defendant Nora Finda Bundoo, with criminal intent, purposely, knowingly and intentionally, conspired and colluded with You Co-Defendants Saah Johnson Sr, in your personal capacity and as CEO, Marsaco Auto Services Inc., Thelma Fanta Kroma and Catherine Satia, to carried out several monies transactions to include debits and credits/deposits at Afriland Bank in aforesaid account.

67. Additionally, between the period of January 4, A.D. 2020, You Co-Defendant Nora Finda Bundoo carried out several transactions and or debited to Defendant's Saah Johnson of Marsaco Auto services Inc., between the period of February 21, 2023, to and including March 4. A.D. 2023, in account, 0200-892-301-87, in the sum of US$921,600 (Nine Hundred Twenty-Two Six Hundred United States Dollars) for the sole purpose to launder same.

68. That, instead of Co- defendant Anita Pamela Jallah to be identified, a 100% shareholder of Anita Group of Companies to transact in all of the accounts, own and belonging to Anita Group Companies, You Co-Defendant Nora Finda Bundoo, conducted dubious transactions within all of the accounts, both debits and deposits done in Anita Group of Companies' account# 0200892-301-87, is USD$3,685,200.00(Three Million Six Hundred Eighty- Five Thousand Two Hundred United States Dollars as debit), and USD$4,196,100.14 (Four Million One Hundred Ninety-Six Thousand One Hundred United Sate Dollars Fourteen-cent, as deposits).

Defendant's Name	Date of Transaction	Total Debit	Total: Credit
Nora Finda Bundoo	6/1/2023-23/11/2023	USD$2,931,200.00	USD,3,272,100.14
Saah F. Johnson, Sr			USD400,000.00
Anita Pamelia Jallah			
Thelma Fanta Kromah	20/6/2023-21/6/2023	USD$225,000.00	
Getrude Daye	20/4/2023	USD$524,000.00	USD$524,000.00
Catherine Satia	4/3/2023	USD$5,000.00	

Total		**US$3,685,200.00**	**US$4,196,100.14**

69. That, the below chart show huge transactions, deposits and debits done by You Co-Defendant Nora Finda Bundoo, in your personal account 008216610187601-01 at IB bank to Karim Younes of GBK Motor, thought its' Management to be identified.

70. That, You Co-Defendant Nora Finda Bundoo, debited the sum of USD$921,600.00 (Nine Hundred Twenty-One Thousand Six Hundred United States Dollars), in account 0200892301-87 between the period of February 21, A.D. 2023, up to and including April 4, A.D. 2023, to Co-Defendant Saah F. Johnson. Sr. of Masarco Auto Services as indicated below in the chart:

Date of Transaction	Transferred Order	Amount USD$
21/2/2023	,, ,, ,,to Masarco Auto	57,600.00
24/2/2023	,, ,, ,, ,, ,, ,, ,, ,, ,,	288,000.00
3/3/2023	,, ,, ,, ,, ,, ,, ,, ,,	288,000.00
4/3/2023	,, ,, ,, ,, ,, ,, ,, ,,	288,000.00s
Grand total	N/N	USD$921,600.00

70. That, You Co-Defendant Nora Finda Bundoo debited in the sum of (USD$1,775,000.00 (One Million Seven Hundred Seventy-Five Thousand) in account 0200892301-87 between March 6, A.D. 203, to April 4, A.D. 2023, to T.R.H, Trading Corporation see chart below:

Date of Transaction	Transferred Order to T.R.H	Amount USD$
20/4/2023	,, ,, ,, ,, ,, ,, ,, ,,	775,000.00
20/04/2023	,, ,, ,, ,, ,, ,, ,, ,,	500,000.00
6/3/2023	,, ,, ,, ,, ,, ,, ,, ,,	500,000.00
Grand total	N/N	USD$1,775,000.00

71. That, moreover, the herein named Defendant, debited to JUCHI Trading Corporation and SIB bank, USD$105,000.00, (One Hundred Five Thousand United States Dollars), and USD$129,600.00 in account 0200892301-87 during the period of November 23, A.D. 2022, up to and including June 1, A.D. 2023 see chart below:

Date of Transaction	Transferred Order to JICHI Trading	Amount USD$
20/04/2023	,, ,, ,, ,, ,, ,, ,, ,, ,,	40,000.00
6/1/2023	,, ,, ,, ,, ,, ,, ,, ,, ,,	65,000.00
Grand Total	N/N	USD$105,000.00

Defendant's Nora Finda Bundoo to Transfer order to SIB Bank Liberia Limited

Date of Transaction	Transferred Order to SIB Bank	Amount USD$
November A.D. 23, 2022		129,600.00

72. That, during AREPT investigation, it was also established that the total checks encashed from the periods mentioned below as showed in the chart, were directly done in account number 0200892301-87USD belonging to You Co-Defendant Nora Finda Bundoo see chart below indicating the transactions;

Date of Transaction	Checks Numbers	Amount USD$
12/1/2023	CHKS#00000612	201, 801.60
27/2/2023	,, ,, ,, ,, 00396284	50,444.52
27/2/2023	,, ,, ,, ,, 00396280	151,333.56
4/4/2023	,, ,, ,, ,,00389440	50,445.70
17/7/2023	,, ,, ,, ,,00001830	625,444.72
	N/N	USD$1,079,470.10

73. That, in the same account#0200892301-87, on 27th day of the Month March A.D. 2023, Co-Defendant Saah Johnson, Sr, Manager of Masarco Auto Services Inc, transferred USD$400,000.00 (Four Hundred Thousand United States Dollars), from Masarco Auto Services Inc, account at Afriland Bank with account# 010-001-020215790161, back to Anita Group of Companies account herein. Thus, creating suspicious; and indicating Defendant's Saah F. Johnson, Sr and his entity involvement in the commission of the crime of money laundering, having received the sum of USD$921,600.00, from Anita Business Center of April 3, 2023, on a purported Motor bikes and or tricycles sales.

Defendant's Name	Date of Transaction to Anita Group Acct	Debit
Saah F. Johnson, Sr	27/3/2023	USD$400,000.00

74.That, three (3) separate checks that were debited as reflected below by Co-Defendants Thelma Fanta Kroma and Gertrude Daye to be identified, between the period of June 20, A.D. 2023 up to and including April 4, 2023, in account 0200892301-87 amounted to USD$749,000.00 (Seven Hundred Forty-Nine Thousand United Dollars as debit) see chart below indicating their transactions.

Date of Transaction	Encashed Checks' Numbers	Amount USD$
20/6/2023	CHQ#00135933	200,000.00
21/6/2023	,, ,, ,, ,,0015990	25,000.00
Grand	N/N	USD$225,000.00
20/4.2023	Def. Getrude Day/00056190	524,000.00
Grand total for both Def.	N/N	USD$749,000.00

75. That, Co-Defendant Nora Finda Bundoo as holder with account number 0200892301-87 had several transactions of which the investigation had identified and placed or illustrated in the chart below:

Date of Transaction	Transferred Order	Amount USD$
29/6/2023	,, ,, ,,, ,, ,, ,,,	200,000.00
10/07/2023	,, ,, ,, ,, ,, ,,	116,000.00
	,, ,, ,, ,, ,, ,, ,,	USD$316,000.00

76. AREPT investigation from, the evidence obtained, maintain that Anita Group of Companies had four accounts through which the crime of money laundering and other criminal transactions occurred. The below chart contains the four accounts indicating the banking institutions those accounts were domiciled. See chart below:

Accounts Number	Bank
0100-892-311-09, LRD	Afriland
0200-892-301- 87, USD	Afriland

0200-892-312-54, USD	Afriland
0200-892-311-57 USD	Afriland

77. AREPT Investigation, through diligent search of the records and the transactions, captured additional accounts own and belonging to Nora Finda Bundoo through which several criminal transactions and stolen money were laundered. See chart below:

Account's Numbers:	Currency	Banks
00821661018760101	Liberian Dollars	First International Bank, IBLL
008218410187602-02	USD	,, ,, ,, ,, ,, ,, ,, ,, ,,
02242002915-77	USD	Access Bank
02212002625-27	USD	Access Bank
0201384606-94	USD	Afriland Bank
0101384606-46	USD	Afriland Bank

78.That, investigation further uncovered that, Co-Defendant Edwin Kai to be identified, carried out cash deposit in account# 008218410187602-02-USD$, under the account title; **Nora Finda Bundoo, with address Rehab Community, Paynesville, Montserrado.** The below chat indicates Defendant's Edwin Kai transaction in aforesaid account, deposited the amounted of USD$160,000,00(One Hundred Sixty Thousand United Dollars), between the period of January 9, A.D. 222018, up to and including April 19, A, D.2018.

Date of Transaction	Description Deposit	Amount USD$
Jan- 9, 2018	,, ,, ,, ,, ,, ,, ,, ,, ,,	10,000.00
Jul-11, 2018	,, ,, ,, ,, ,, ,, ,, ,, ,,	40,000.00
Apr-19, 2018	,, ,, ,, ,, ,, ,, ,, ,, ,,	110,000.00
Grand Total:	N/N	USD$160,000.00

79. That, at the same time, in account numbers;0082166101876010-1, a Liberian Dollars account, under the account **Title Nora Finda Bundoo, with account Address Rehab Community, Paynesville, Montserrado County,** Co- Defendant Francis T. Blamo, carried out several transactions, deposited in the said account during the period of May 23, A.D. 2022, up to and including January 15, A.D. 2024, amounted to the total (LRD$24,991,250.00), Twenty-Four Million Nine Hundred Ninety-One Thousand Two Hundred Fifty Liberian Dollars).

See chart below indicating the transactions:

Date of Transaction	Description; Deposit	Amount LRD$
5/23/2022	,, ,, ,, ,, ,, ,, ,,	150,000.00
5/30/2022	,, ,, ,, ,, ,, ,, ,,	140,000.00
6/6/2022	,, ,, ,, ,, ,, ,, ,,	135,000.00
13/6/2022	,, ,, ,, ,, ,, ,, ,,	135,000.00
20/6/2022	,, ,, ,, ,, ,, ,, ,,	135,000.00
27/6/2022	,, ,, ,, ,, ,, ,, ,,	135,000,00
4/7/2022	,, ,, ,, ,, ,, ,, ,,	135,000.00
12/7/2022	,, ,, ,, ,, ,, ,, ,,	135,000.00
18/7/2022	,, ,, ,, ,, ,, ,, ,,	135,000.00
25/7/2022	,, ,, ,, ,, ,, ,, ,,	135,000.00
1/8/2022	,, ,, ,, ,, ,, ,, ,,	135,000.00
8/8/2022	,, ,, ,, ,, ,, ,, ,,	180,000.00
15/8/2022	,, ,, ,, ,, ,, ,,	225,000.00

22/8/2022	,, ,, ,, ,, ,, ,,	225,000.00
29/8/2022	,, ,, ,, ,, ,, ,,	252,000.00
5/9/2022	,, ,, ,, ,, ,, ,,	252,000.00
13/9/2022	,, ,, ,, ,, ,, ,,	237,000.00
20/9/2022	,, ,, ,, ,, ,, ,,	228,000.00
27/9/2022	,, ,, ,, ,, ,, ,, ,,	216,000.00
11/10/2022	,, ,, ,, ,, ,, ,,	264,000.00
18/10/2022	,, ,, ,, ,, ,, ,,	234,000.00
26/10/2022	,, ,, ,, ,, ,, ,, ,,	270,000.00
4/11/2022	,, ,, ,, ,, ,, ,,	264,000.00
10/11/2022	,, ,, ,, ,, ,, ,,	270,000.00
18/11/2022	,, ,, ,, ,, ,, ,,	216,000.00
30/11/2022	,, ,, ,, ,, ,, ,,	233,000.00
6/12/2022	,, ,, ,, ,, ,, ,,	247,000.00
13/12/2022	,, ,, ,, ,, ,, ,,	240,000.00
21/12/2022	,, ,, ,, ,, ,, ,,	230,000.00
1/10/2023	,, ,, ,, ,, ,, ,, ,,	250,000.00
1/23/2023	,, ,, ,, ,, ,, ,, ,,	250,000.00
2/9/2023	,, ,, ,, ,, ,, ,, ,,	225,000.00
2/20/2023	,, ,, ,, ,, ,, ,, ,,	250,000.00
2/28/2023	,, ,, ,, ,, ,, ,, ,,	202,000.00
3/13/2023	,, ,, ,, ,, ,, ,, ,,	240,000.00
3/23/2023	,, ,, ,, ,, ,, ,,	260,000.00
4/4/2023	,, ,, ,, ,, ,, ,,	300,000.00
17/4/2023	,, ,, ,, ,, ,, ,,	270,000.00
22/5/2023	,, ,, ,, ,, ,, ,,	270,000.00
30/5/2023	,, ,, ,, ,, ,, ,,	149,000.00
5/6/2023	,, ,, ,, ,, ,, ,,	170,000.00
19/6/2023	,, ,, ,, ,, ,, ,, ,,	720,000.00
27/6/2023	,, ,, ,, ,, ,, ,, ,,	720,000.00
4/7/2023	,, ,, ,, ,, ,, ,,	720,000.00

11/7/2023	,, ,, ,, ,, ,, ,, ,,	720,000.00
19/7/2023	,, ,, ,, ,, ,, ,, ,,	711,000.00
1/8/2023	,, ,, ,, ,, ,, ,, ,,	720,000.00
8/8/2023	,, ,, ,, ,, ,, ,, ,,	648,000.00
16/8/2023	,, ,, ,, ,, ,, ,, ,,	685,000.00
23/8/2023	,, ,, ,, ,, ,, ,, ,,	640,000.00
30/8/2023	,, ,, ,, ,, ,, ,, ,,	600,000.00
12/9/2023	,, ,, ,, ,, ,, ,, ,,	680,000.00
19/9/2023	,, ,, ,, ,, ,, ,, ,,	630,000.00
27/9/2023 .	,, ,, ,, ,, ,, ,, ,,	630,000.00
17/10/2023	,, ,, ,, ,, ,, ,, ,,	640,000.00
30/10/2023	,, ,, ,, ,, ,, ,, ,	670,000.00
6/11/2023	,, ,, ,, ,, ,, ,, ,	620,000.00
20/11/2023	,, ,, ,, ,, ,, ,,	660,000.00
4/12/2023	,, ,, ,, ,, ,, ,,	555,000.00
8/12/2023	,, ,, ,, ,, ,, ,,	550,000.00
11/12/2023	,, ,, ,, ,, ,, ,, ,,	657,000.00
18/12/2023	,, ,, ,, ,, ,, ,, ,,	640,000.00
26/12/2023	,, ,, ,, ,, ,, ,, ,,	600,000.00
3/1/2024	,, ,, ,, ,, ,, ,, ,,	400,000.00
8/1/2024	,, ,, ,, ,, ,, ,, ,,	500,000.00
15/1/2024	,, ,, ,, ,, ,, ,, ,,	560,000.00
Grand Total	N/N	LRD$24,991,250.00

80. That. on 27th day of the month of February A.D. 2022, under the covered of darkness and through the influenced of Co- Defendant Nora Finda Bundoo, you defendant Francis T. Blamo entered into an agreement with GBK Motors Incorporated Inc, for the purchased of forty-two (42) pieces of SUZUKI Sedan vehicles, valued at USD$424,000.00 (Four Hundred Twenty-Four Thousand United States Dollars).

82. That, instead of Co-defendant, Francis T. Blamo, General Manager of Anita Group of Companies/Gracious Ride to take full responsibility as a direct result of the agreement entered into for payment, You Co-Defendant Nora Finda Bundoo without being authorized by the corporate entity nor being a party or signatory to the payment agreement executed, took upon yourself with the criminal intent to begin gradual payment to GBK Motor Incorporated from your both United States and Liberian Dollars personal accounts, in the sum of LRD$26,000,000.00 (Twenty-Six Million Liberian Dollars) to include USD$110,000.00 (One Hundred Ten Thousand United Sates Dollars), from International Liberia Limited (IBLL) with accounts numbers 008218410187602-02USD and 008216610187601-01 LRD. Investigation maintains that the forty-two vehicles with service name''Gracious Ride'' are criminal proceeds from the crime of money laundering committed by you.

See chart below for payment at International Bank Liberia Limited.

Account Numbers	Date of Payment	*Amount Paid/Currency*
0082166101876010-1	13/1/2024	*LRD$4,000,000.00*
0882166101876010-1	24/11/2023	*LRD$22,000,000.00*
088218410187602-02	24/11/2024	*USD$110,000.00*
Grand Total	N/N	*LRD$26,000,000.00 plus USD$110,000.00*

83.That, between the period of May 3rd to the 16th A.D. 2022, you Co-defendant, Sam Weah to be identified, transacted in the same account#0082166101876010-1, debited the total amount of LRD$450,000.00 (Four Hundred and Fifty Thousand Liberian Dollars) through the influenced of Co-defendant Nora Finda Bundoo.

84. That Co- Defendants, Thelma E. Ducan Sawyer to be identified, former Deputy Minister for Administration of the Ministry of Foreign Affairs (MOFA), at the time, criminally connived and conspired Co-defendant Nora Finda Bundoo to transfer from Anita Business Center account, account 0200892311-57 at the Afriland Bank the amount of USD$50,000.00. to the operational account of the Ministry of Foreign Affairs account 0220630001506 at the Central Bank of Liberia.

That, You Co-Defendant Thelma E. Ducan Sawyer, wrote and approved a communication dated November 16. A.D. 2022, and authorized the transferred of the USD$50,000.00 (Fifty Thousand United States Dollars) that was transferred under the instruction of Co-defendant Nora Finda Bundoo to Paris for a purported purpose of accommodation. The herein defendant, Thelma Duncan Sawyer, acted in gross violation of section 4(1) of the Public Financial Management (PFM) law of the Government of Liberia and the regulation of the Ministry of Foreign Affairs.

There and then, the crime of Money Laundering, the herein named Defendants did do and commit without an affirmative defense.

Offenses: 2.2 Kinds of Culpability:

A person engages in conduct:
(a) "purposely" if when he engages in the conduct, it is his conscious object to engage in conduct of that nature or to cause the result of that conduct
(b)"knowingly" if when he engages in the conduct he knows or has a firm belief unaccompanied by substantial doubt that he is doing so, whether or not it is his purpose to do so.

Money Laundering offense;
(1) Offense of Money Laundering: a person or body corporate or other legal entity commits the offense of money laundering if that person knowing or having reason to believe or suspect that property, is the proceeds of crimes; converts or transfers the property for the purpose of concealing or disguising the illicit origin of that property, or of aiding any person involved in the commission of the criminal conduct to evade the legal consequences of the conduct.

(a) Conceals or disguises the true nature, origin, location, disposition, movement, or ownership of or right respect to, the property

(b) Acquires, possesses or uses the property
(c) engages directly or indirectly in any transaction which involves the property;
(d) participates in, associate with or conspires to commit, attempts to commit or aids abets or facilitates of counsels the commission of any of the above acts.

15.2.2 Predicate offense for Money Laundering:

1) Predicates for money laundering are those criminal offenses and or acts, which result in the generation of proceeds. Predicate offenses include, but are not limited to, the following criminal acts, which may be found in the penal law or other laws of Liberia.
a) participate in an organized criminal group and racketeering;

COUNT TWO (2) THEFT OF PROPERTY

That, the Special Grand Jurors for Montserrado County, Republic of Liberia upon their oath do hereby find more probably than not, that, You Defendants Nora Finda Bundoo, former Chief of Protocol, Francis T. Blamo, Manager Gracious Ride/ Anita Group of Companies, , Saah Johnson Sr, in your personal capacity and as CEO, Marsaco Auto Services Inc, Emmanuel Kollie, in your personal capacity and as General Manager of Anita Business Center, Jimmy Emmanuel Flomo, in your personal capacity and as Manager of Anita Business Center, Anthony Saytue, in your personal capacity and as Manager, Anita Mining and Agriculture Development Cooperative Society, Philip Toe, in your personal capacity and as Assistant Manager, Anita Mining and Agriculture Development Cooperative Society; Anita Pamela Jallah, in your personal capacity and as Chief Executive Officer, Anita Group of Companies Inc, Anthony Saytue, in your personal capacity and as Manager, Anita Mining Group, Praise Farley, Edwin Kai, JoyceSawyer, Susannah Nollen, Catherine Satia, Boyd Wah, Gertrude Daye, Jartu Tamba, Comfort Saye, Thelma Fanta Kromah, Socrate Weah, Kokulo S. Dorbor, Gayflor Y. Mulbah, Jones Hinneh, Johnson Sumo, Rev. Fallo Fallah, Mohammed Toure, Sophie Petter, Satia NY, Decontee Harris, Julian Wiah, Theo Nagbe, Samuel M. Barrain, Benson T. Wion, Benjimin T. Lathrobe, Seth A. Togba, Miller K. Sumo, Victor Kar, all believed to be staffs of the Anita Group of companies through its subsidiary, Anita Business Center; and others be identified, did conspire, connive, facilitate and did commit the Crime of Theft of Property in flagrant violation of 4 LCLR, Title 26, Section 15.51 (a); and 4 LCLR, Title 26, Section 2.2 (a) and (b); and 4 LCLR, Title 26, Section 15.6 (a), (b), (e),(g) and (k); and 4 LCLR, Title 26, Section 15.54, of the Statutory Law of the Republic of Liberia; a felony of the second degree to wit:

86.That, between the time interval of A.D. 2018, up to and including January 22, A. D. 2024, in City of Monrovia, Montserrado County and in the bailiwick of the Republic of Liberia, you Co-Defendant Nora Finda Bundoo to be identified, at the time, a politically Exposed person (PEP), connived, colluded and conspired with Jimmy Emmanuel Flomo, in your personal capacity and as Manager of Anita Business Center, Anthony Saytue, in your personal capacity and as Manager, Anita Mining and Agriculture Development Cooperative Society, Philip Toe, in your personal capacity and as Assistant Manager, Anita Mining and Agriculture Development Cooperative Society; Anita Pamela Jallah, in your personal capacity and as Chief Executive Officer, Anita Group of Companies Inc, Anthony Saytue, in your personal capacity and as Manager, Anita Mining Group, Praise Farley, Edwin Kai, JoyceSawyer, Susannah Nollen, Catherine Satia, Boyd Wah, Gertrude Daye,

Jartu Tamba, Comfort Saye, Thelma Fanta Kromah, Socrate Weah, Kokulo S. Dorbor, Gayflor Y. Mulbah, Jones Hinneh, Johnson Sumo, Rev. Fallo Fallah, Mohammed Toure, Sophie Petter, Satia NY, Decontee Harris, Julian Wiah, Theo Nagbe, Samuel M. Barrain, Benson T. Wion, Benjimin T. Lathrobe, Seth A. Togba, Miller K. Sumo, Victor Kar, all believed to be staffs of the Anita Group of companies through its subsidiary, Anita Business Center; and others to be identified. And thereafter, you, Co-Defendant Nora Finda Bundoo, organized, designed, and developed a criminal syndicate, with the purpose and intent to commit a crime, did do and commited the crime of Theft of Property.

87. That, in addition to the syndicate and orchestration, you, Co- Co-Defendant Nora Finda Bundoo to be identified, being involved in a conflict of interest, onward, opens multiple accounts at Afriland First Bank Liberia Limited, including other personal and or additional accounts at LBDI, IBLL, and Access Banks respectively. With the onward intent to shield, conceal, and divert public attention, and with regard to your criminal involvement into multiple suspicious transactions and illicit and criminal activities in the aforesaid accounts.

89. That, the AREPT, investigation uncovered that, you herein named Defendants used several multiple accounts, thereafter, stole, took and carried away the amount of USD$ 6,731,441.00, and LRD$ 845, 240, 057, between the periods of A.D. 2018 up to and including January 22, A.D. 20224, in the City of Monrovia, Montserrado County, Republic of Liberia.

90. That, the herein-named Defendants have no affirmative defense.

THEFT OF PROPERTY

A person is guilty of theft if he:

a) Knowingly takes, misappropriates, converts, or exercises unauthorized control over, or makes unauthorized transfer of an interest in, the property of another with the purpose of depriving the owner thereof,
b) Knowingly obtains the property of another by deception or by threat with the purpose of depriving the owner thereof.

In relation to the PROPERTY and services," OBTAIN" means to bring about a transfer or purported transfer of an interest in the property, whether to the Defendant or another, and secure performance thereof.

"PROPERTY OF ANOTHER" means property in which a person other than the actor has an interest which the actor is not privileged to infringe without consent regardless of the fact the actor also has an interest in the property and regardless of the fact that the other person might be precluded from civil recovery because the property was used in unlawful transaction or was subject to forfeiture as security interest bearing therein even if legal title is in the creditor pursuant to a conditional sales contract of another security agreement.

" OWNER" means any person or Government with an interest in the property such that it is property of another as far as the Defendant is concerned.

A person engages in conduct purposely if when he engages in conduct, it is his conscious objective to engage in conduct of that nature or to cause the result of that conduct.

"DEPRIVED" means to withhold property or cause it to be withheld either permanently or under such circumstances that a major portion of economic value, or its use and benefit has in fact been appropriated, and withhold property or cause it to be withheld with the intent to restore it only for payment of a reward or other compensation and dispose of property or use it or transfer any interest in it under circumstances that make its restoration impossible.

And that the value of the property stolen was $50,000 or over, and the property was acquired or retained by a first- or second-degree felony.

COUNT THREE (3) FORGERY OR COUNTERFEITING

That the Special Grand Jurors for Montserrado County, Republic of Liberia, upon their Oath does hereby find more probably than not, that, Defendant. Nora Finda Bundoo did commit the Crime of Forgery or Counterfeiting in flagrant violation of Chapter 15, subchapter 15.70(a) (v) and (c), and 4LCLR Title 26, Section 15. 2.2 (1), and (a) ; and 4 LCLR, Title 26, Section 2.2 (a) and (b); and 4 LCLR, Title 26, Section 15.6 (a), (b), (e),(g)and (k); and 4 LCLR, Title 26, Section 15.54, of the Statutory Law of the Republic of Liberia; a felony of the third degree to wit:

91. That, during the period of July A.D. 2014, you, Co-Defendant Nora Finda Bundoo, engaged yourself in opening the Anita Group of Companies' accounts, contrary to the registration date of the Anita Group Companies' Article of Incorporation on July 27, A.D. 2021. That The account records from Afriland First Bank Liberia Limited indicate that you Defendant for criminal purpose used the GSM numbers belonging to others for the criminal opening of these accounts at Afriland Bank Liberia Limited. See the chart below of these numbers and names:

Name of Number Owners	Number#	Addresses
Koryon Sheriff	0776-339-710	
Undisclosed identity/Nam	0779-200-200	
Undisclosed identity	0880-495-457	
Undisclosed identity	0886-151818	

92. That, Defendant's Nora Finda Bundoo has no affirmative defense.

FORGERY OR COUNTERFEITING:

1. Definition. A person has committed forgery or counterfeiting, if, with the purpose of deceiving or harming the Government or another person, or with knowledge that he is facilitating such deception or harm by another, he
a) knowingly and falsely makes, completes or alters any writing or subject; or
b) knowingly utters a forged or counterfeited writing or object.

COUNT FOUR (4)

(MISUSE OF PUBLIC MONEY, PROPERTY OR RECORD)

That, the Special Grand Jurors for the County of Montserrado, Republic of Liberia, upon their Oath do hereby find more probably than not, that, You Co-Defendants Nora Finda Bundoo, and Thelma E. Sawyer (former Deputy Minister for Administration Ministry of Foreign Affairs did do and commit the crime of Misuse of Public Money, Property or Record, in violation of Chapter 15.81(a) (b) and (c) of the new panel of Law, a felony of the first degree, to wit:

93. That, Co-Defendant Nora Finda Bundoo, at the time, being a politically exposed person, misused your official position and established the Anita Group of Companies, opened several accounts, including other personal accounts. And thereafter, took complete control over Anita Group of Companies' entire functions by issuing checks and making transfer orders from one bank account to another.

Chapter 10. Inchoate Offenses: 2.2 Kinds of Culpability

A person engages in conduct:

(a)"purposely" if, when he engages in the conduct, it is his conscious object to engage in conduct of that nature or to cause the result of that conduct
(b)"knowingly" if, when he engages in the conduct, he knows or has a firm belief unaccompanied by substantial doubt that he is doing so, whether or not it is his purpose to do so.

Misuse of Public Money, Property, or Record

"A person is guilty of a first-degree felony if he:
(a) Knowingly steals, takes, purloins, or converts to his own use and benefit or the use of another; or without authority, sells, conveys or disposes of any record, voucher, money or thing of value of the Government of Liberia or any Ministry, or Agency thereof, or public corporation, or any property made of being made under contract for the Government of Liberia or any Ministry, Agency thereof or public corporation;
(c) Disposes of, uses, or transfers any interest in property which has been entrusted to him as a fiduciary, and in his capacity as a public servant or any officer of an institution, in a manner he knows is not authorized and that he knows to involve risk of loss or detriment to the owner of the property or to the Government of Liberia or other person for whose benefit the property was entrusted.
101. There and then, the crime of Misuse of Public Money, Properly or Record, the Defendants did jointly, did do and commit contrary to the peace and dignity of the Republic of Liberia.

Count Five (Criminal Conspiracy)

That, the special Grand Jury for Montserrado County, Republic of Liberia, upon their oath do hereby, find, more probably than not that, You Co-Defendants, Nora Finda Bundoo, for the purpose of promoting or facilitating the commission of the crimes herein, agreed, conspired and connived with Co-Defendants Thelma E. Ducan Sawyer, Parise Farley, Emmanuel Kollie, Francis T. Blamo, Anthony Saytue, Edwin Kai, Joyce Sawyer, Getrude Daye, Gayflor Mulbah, Jones Hinneh, Fallo Fallah, Comfort Saye, Jartu Tamba, Socrate Weah, Thelma Fanta Kromah, Johnson Sumo, Satiah Nyemah, Decontee Harris, Jimmy Emmanuel Flomo, G. Edmond Pompon, Catherine Satia, to be identified, committed the crime of Criminal Conspiracy in Violation of Chapter 10, Subsection "D", Section 10.4(1)(2) (3)(4),

of the New Penal Law of Liberia in the form and manner, a felony of second degree, to wit;

94. That, between the period of A.D. 2018, up to and including A.D. 2024, in the City of Monrovia, Montserrado County and elsewhere in the bailiwick of the Republic of Liberia, You Co-Defendants Nora Finda Bundoo, Thelma E. Ducan Sawyer, Parise Farley, Emmanuel Kollie, Francis T. Blamo, Anthony Saytue, Edwin Kai, Joyce Sawyer, Getrude Daye, Gayflor Mulbah, Jones Hinneh, Fallo Fallah, Comfort Saye, Jartu Tamba, Socrate Weah, Thelma Fanta Kromah, Johnson Sumo, Satiah Ny, Decontee Harris. Jimmy Emmanuel Flomo, G. Edmond Ponpon, Catherine Satia, to be identified, met, planned, connived, and in joined accord, made several criminal deposits and withdrew in huge sum of both USD$6,731,441.00 (Six Million Seven Hundred Thirty One Thousand Four Hundred Forty One United States Dollars) and LRD$845,240,057 (Eight Hundred Forty Five Million, Two Hundred Forty Thousand Five Seven Liberian Dollars) from Afriland First Bank, IBLL, and Access Banks accounts in the commission of the crime of criminal facilitation

95. In addition to the commission of the crime of Criminal Conspiracy, You Co-Defendants Thelma E. Ducan, former Deputy Minister for Administration at the time of the Ministry of Foreign Affairs wrote and approved a communication dated November 16, A.D. 2021 and, authorized the transferred of USD$50,000.00 from Anita Group of Companies' account 0200892311-57 at Afriland First Bank, Liberia limited, to the Liberian Embassy in Paris, France, for balance payment on accommodation expenses related to a Liberian delegation.

96. That, You Co- Defendant G. Edmund Ponpon, Jr., serving within the employ of the Ministry of Commerce and Industry as Policy Analyst, misused said official office, and in the same token, connived and conspired with Co-Defendant Jimmy Emmanuel Flomo of Anita Group of Companies Inc. Thereafter, You Defendant G. Edmund Ponpon, Jr, on three (3) occasions between January 20, 25, A.D. 2021 to and including June 1, A.D. 2021, used your Liberian Citizen ID and official working ID to sign for three (3) checks criminally on behalf on Anita Group of Companies Inc. That, You Co-Defendant G. Edmund Ponpon, Jr, to be identified, as a non-employee of Anita Group Companies, signed for the three (3) checks which amounted to USD$640,000.00 (Six Hundred Forty Thousand United States Dollars), there and then, the crime of criminal conspiracy, you, herein named Defendants, did do and commit.

97. That The Defendants have no affirmative defense.

Offenses: 2.2 Kinds of Culpability:

A person engages in conduct:

(a)"purposely" if, when he engages in the conduct, it is his conscious object to engage in conduct of that nature or to cause the result of that conduct
(b)"knowingly" if, when he engages in the conduct, he knows or has a firm belief unaccompanied by substantial doubt that he is doing so, whether or not it is his purpose to do so.

Criminal Conspiracy:
A person is guilty of committing a crime conspiracy if. With the purpose of promoting or facilitating its commission, he agrees with one or more persons to

engage in or cause the performance of that conduct which constitutes the crime; and any one or more of such persons does an act to affect the objective of the conspiracy.

COUNT SIX (6) CRIMINAL FACILITATION

That, the Special Grand Jury for Montserrado County, Republic of Liberia, upon their oath do hereby, find, more probably than not that, you defendants, Nora Finda Bundoo, Thelma E. Ducan Sawyer, Parise Farley, Emmanuel Kollie, Francis T. Blamo, Anthony Saytue, Edwin Kai, Joyce Sawyer, Getrude Daye, Gayflor Mulbah, Jones Hinneh, Fallo Fallah, Comfort Saye, Jartu Tamba, Socrate Weah, Thelma Fanta Kromah, Johnson Sumo, Satiah Nyemah, Decontee Harris. Jimmy Emmanuel Flomo, Catherine Satia, G. Edmun Ponpon Jr, and others to be identified, committed the crime of Criminal Facilitation in Violation of Chapter 10, Section 10.2 of the New Penal Law of Liberia in the d manner, a felony of second degree, to wit;

98. That investigation gathered that, you Co-Defendants, Thelma E. Ducan Sawyer, Parise Farley, Emmanuel Kollie, Francis T. Blamo, Anthony Saytue, Edwin Kai, Joyce Sawyer, Getrude Daye, Gayflor Mulbah, Jones Hinneh, Fallo Fallah, Comfort Saye, Jartu Tamba, Socrate Weah, Thelma Fanta Kromah, Johnson Sumo, Satiah Nyemah, Decontee Harris. Jimmy Emmanuel Flomo, Catherine Satia, Mohammed Sesay, and others to be identified, in one accord, facilitated and conspired with Co-Defendant Nora Finda Bundoo and began suspicious and or dubious transactions in all of the accounts owned and belonging to and or under the title Anita Group of Companies, to include cash flow in and out of the aforesaid accounts. That you, herein named Defendants, have therefore, purposely, willfully, and criminally committed the crime of Criminal Facilitation against the peace and dignity of the Republic of Liberia.

99. That, you Defendants, Thelma E. Ducan Sawyer, Parise Farley, Emmanuel Kollie, Francis T. Blamo, Anthony Saytue, Edwin Kai, Joyce Sawyer, Getrude Daye, Gayflor Y. Mulbah, Jones Hinneh, Fallo Fallah, Comfort Saye, Jartu Tamba, Socrate Weah, Thelma Fanta Kromah, Johnson Sumo, Satiah Ny, Decontee Harris. Jimmy Emmanuel Flomo, Catherine Satia, and others to be identified have no affirmative defense.

Offenses: 2.2 Kinds of Culpability:

A person engages in conduct:

(a)"purposely" if, when he engages in the conduct, it is his conscious object to engage in conduct of that nature or to cause the result of that conduct
(b)"knowingly" if, when he engages in the conduct, he knows or has a firm belief unaccompanied by substantial doubt that he is doing so, whether or not it is his purpose to do so.

Inchoates Offense

Offense of criminal facilitation:

A person is guilty of criminal facilitation who, believing it is probable that he is rendering aid to a person who intends to commit a crime, engages in conduct which provides such person with means or opportunity for the commission thereof, and which in fact aids such person to commit a felony.

AND THE GRAND JURORS AFORESAID, UPON THEIR OATH AFORESAID DO PRESENT THAT THE HEREINABOVE NAMED DEFENDANTS AFORESAID, DO SAY THAT THE CRIMES OF MONEY LAUNDERING, THEFT OF PROPERTY, FORGERY OR COUNTERFEITING, MISUES OF PUBLIC MONEY, PROPERTY OR RECORD, CRIMINAL CONSPIRACY AND CRIMINAL FACILITATION, THE SAID DEFENDANTS DID DO AND COMMIT CONTRARY TO THE FORM, FORCE AND EFFECT OF THE STATUTORY LAWS OF THE REPUBLIC OF LIBERIA IN SUCH CASES MADE AND PROVIDED AND AGAINST THE PEACE AND DIGNITY OF THE SAID REPUBLIC.

1. TRUE BILL (Money Laundering)
   True Bill/Ignoramus
2. TRUE BILL (Theft of property)
   True BILL/Ignoramus
3. TRUE BILL (Criminal Conspiracy)
   True BILL/Ignoramus
4. TRUE BILL (Misuse of Public Money, Property or record)
   True BILL/Ignoramus
5. TRUE BILL Criminal Facilitation)
   True Bill Ignoramus
6. TRUE BILL Forgery)
   True Bill Ignoramus

WITNESSES
1. Insp. Jonh D. Kumeh
2. C/Insp. Augustine Mehn
3. Darlington Dahn
4. Others
5. Documentary evidence

ADDRESSES
L.N.P/ AREPT
L.N.P/AREPT
LRA/AREPT

David K. Kota
Foreman, Special Grand Jurors

Cllr. Richards J. Scott, Jr
County Attorney/Mont/Co/RL

Clerk of Court, Criminal
Court "A"

Dated this 5th day of Nov. A.D. 2025.