

REPUBLIC 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 thru the Ministry of Justice
..... Plaintiff

Crimes

1. Theft of Property
2. Criminal Facilitation

VERSUS

Thelma Ducan Sawyer former Deputy Minister
For Administration, Ministry of Foreign Affairs,
John S. Youboty CEO(MDMC) Express, Joseph
C. Goodridge's, Project Manager, (MDMC),
Managers, and other Representatives of
(MDMC) of the city of Monrovia, Liberia...Defendants

INDICTMENT

Count One (1) Theft of Property

That, the Special Grand Jurors for Montserrado County, Republic of Liberia upon their oath does hereby find more probably than not, that, the Defendants, John S. Youboty ECO, (MDMC), Joseph C. Goodridge, Project Manager (MDMC), Managers, and other Representatives of (MDMC Express), did conspire, connived, 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:

1.That, during the time interval of September 27, A.D. 2022, up to and including April 4, A.D. 2023, in the City of Monrovia, Montserrado County, Republic of Liberia, you Defendants, John S. Youboty, CEO, Joseph C. Goodridge, Sr, Project Manager and other Representatives of (MDMC Express), in gross violation of the law of above-mentioned Laws, at the same time, with deceptive minds and criminal intent, did connived, colluded, conspired and committed the crime of Theft of property.

2. In that, you the herein named Defendants, criminally, intentionally, stole, took and carried away the amount of USD\$851,136.13 (Eight Hundred Fifty-One Thousand One Hundred Thirty-Six United States Dollars Thirteen-Cent), representing 43.65% out of 65.35% of USD\$1,949,999.72 (One Million Nine Hundred Forty-Nine Thousand Nine Hundred Ninety-Nine United States Dollars Seventy-Two -Cent), received for renovation purpose.

3. That, AREPT investigation report revealed that, on the date and at the placed mentioned above, the Kingdom of Saudi Arabia donated to the Government of the Republic the sum of USD\$2,000,000.00 (Two Million United States Dollars), for the renovation of the 1st, 2nd, 3rd, 4th, 5th floors and including the entire parking lot of the Ministry of Foreign Affairs (MOFA).

4. That, the investigation report established that, the said money mentioned above, was transferred from Kingdom of Saudi Arabia to the Republic of Liberia, through the Saud British Bank with, RFB TTCPMNOVO69, MN, NIFO, in to Ministry of Foreign Affairs (MOFA's), Operations account#1502022183, at Central Bank Liberia (CBL), on November 24, A.D. 2022.

5. Thereafter, Co- Defendant John S. Youboty and other representatives and or managers of MDMC Express, were contracted by Thelma Ducan Sawyer former Deputy Minister for Administration and Acting Minister respectively of the Ministry of Foreign Affairs (MOFA), for renovation process. while already renovating a portion of the aforesaid Ministry, Co-defendant, Thelma Duncan Sawyer to identified, wrote a communication dated July 30, A.D, 2023, to Hon. Bodger Scoot Johnson, former Executive Director, Public Procurement and Concession commission (PPCCC); requesting for "NO Objection."

6. AREPT investigation established that, on August 10 A.D. 2023, Hon. Bodger scoot Johnson of (PPCC), in response to the letter from Thelma Bucan Sawyer, wrote and, approved the "No Objection's request to use sole source method procurement process in the selection of Co- Defendant's John S. Youboty, Joseph C. Goodridge, Sr, Project Manager (MDMC Express).

7. AREPT investigation report additionally revealed that, during the period of August A.D. 2023, a notice of Intend to award the contract with reference RL/MFA/2-3c001/2023 was send to Hon. Bodger Scoot Johnson from Thelma Ducan Sawyer, with reference (MFA/PROJ/SS/001/2023

8. That said notice contained the total of USD\$1,949,999.72 (One Million Nine Hundred Forty-Nine Thousand Nine Hundred Ninety-Nine United States Dollars Seventy-Two-Cen), which represented the price of renovation, including the tenure, or contract duration period of Three (3) moths, from September 12, A.D. 2023, up to and including December 31, A.D. 2023.

9. In furtherance, you Co-Defendant John S. Youboty, ECO, Joseph C. Goodridge, Project Manager, other Managers and representatives of (MDMC Express), having agreed to the renovations' contract and received the sum of USD1,949,999.72), representing 100% value, instead, did 56.35% of the renovation work valued at (USD\$1,098,863.58).

10. That, herein named Defendants, in joined accord, purposely, knowingly and intentionally, misapplied, stole, took and carried away USD\$851,136.13, representing the work undone, as per the Forensic Assessment/ Appraisal report, by Emma Technology & Associate Inc, dated August 31, A.D. 2025.

11. Thereby, exercising an authorized control over same and thus, depriving the Government of the Republic out of its tangible property herein supra. 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 exercise 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.

12. 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.

13. "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.

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

25. 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.

15. "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.

16. 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.

AND THE GRAND JURORS AFORESAID, UPON THEIR OATH AFORESAID DO PRESENT THAT THE HEREINABOVE NAMED DEFENDANTS AFORESAID, DO SAY THAT THE CRIME OF THEFT OF PROPERTY, 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.

Count Two (2) Criminal Facilitation

That, the special Grand Jury for Montserrado County, Republic of Liberia, upon their oath does hereby, find, more probably than not that, you Defendant, Thelma Ducan Sawyer, former Deputy Minister, for Administration, Ministry of Foreign Affairs, 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;

17. That, you Thelma Ducan Sawyer, former Deputy Minister, for Administration, Ministry of Foreign Affairs/acting Minister, (MOFA), without evidence of interim Completion Certificate issued to John S. Youboty and other managers of (MDMC Express) as policy of the said Ministry, through its General Service Office, when ahead and paid to Defendants, John S. Youboty and others be identified of (MDMC Express), USD\$1,949,999.72, representing 100%.

18, That, as the direct of Defendants' Thelma Ducan Sawyer to be identified, act, Co-Defendants John S. Youboty, and others to be identified of (MDMC Express), stole, took and carried away USD\$851,136.13 out of the above mentioned amount without legal justification, That, the Defendants have no affirmative defense.

Offenses: 2.2 Kinds of Culpability:

19. 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

20, Offense A person is guilty of criminal facilitation who, believing it probably 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 a commit a felony.

AND THE GRAND JURORS AFORESAID, UPON THEIR OATH AFORESAID DO PRESENT THAT THE HEREINABOVE NAMED DEFENDANTS AFORESAID, DO SAY THAT THE CRIME OF CRIMINAL FACILITATION, THE SAID DEFENDANT 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 (Theft of Property)

True Bill/Ignoramus

2. TRUE BILL (Criminal Facilitation)

True BILL/Ignoramus

Witnesses

1. Sonja A. Gibson

2. C/Insp. Augustine Mehn

3 Insp. John D. Kumeh

Others

4. Documentary evidence

David K. Kota

Foreman Special Grand Jurors

Addresses

Chief Investigator/AREPT

L.N.P/AREPT

L.N.P/AREPT

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

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Clerk of Court, Criminal
Court "A"

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