

REPUBLIC OF LIBERIA)
MONTSERRADO COUNTY)

IN THE FIRST JUDICIAL CIRCUIT CRIMINAL
ASSIZES "A" FOR MONTSERRADO COUNTY,
SITTING IN ITS' FEBRUARY TERM A.D. 2026

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

Republic of Liberia by and thru the Ministry of s
Justice and Assets Recovery & Property Retrieval
Task Force (AREPT).....Plaintiff

CRIMES

- 1.Theft of Property
2. Economic Sabotage (Misuse of Public Money Property or Records)
3. Misapplication of Entrusted Property
4. Criminal Conspiracy

VERSUS

Mawine G. Diggs, Former Minister, Ministry of
Commercnce and Industry, Wilfred Bangura, Former
Deputy Minister/ Adm., Ministry of Commercnce
And Industry, Gudi J.N. Neufville, Financial
Comptroller, Ministry of Commercnce and Industry,
Joseph Yado Howe, Former Senior Policy Adviser,
Ministry of Commerce and Industry, Kebah
Monger, President National Rural Women Structure
of Liberia, Elizabeth Finda Sambulah, President
Liberia Marketing Association (LMA), Josephine
Handful Greeves, Former Secretary, National Rural
Women Structure of Liberia and Kemmoh Borbor
Cashier, Ministry of Commerce and Industry, to be
identified of the City of Monrovia, Liberia.....Defendants

INDICTMENT

Count One (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, You Defendants, Mawine G. Diggs, Former Minister, Ministry commerce and Industry, Wilfred Bangura, Former Deputy Minister, Ministry of Commercnce and Industry, Gudi J.N. Neufville, Financial Controller, Ministry of Commercnce and Industry, Joseph Yado Howe Haward, former Consultant/ Policy Adviser, Ministry of Commerce and Industry, Kebah Monger, President National Rural Women Structure of Liberia, Elizabeth Finda Sambulah, President Liberia Marketing Association, (LMA), Josephine Handful Greeves, former Secretary, National Women Structure of Liberia, and Kemmoh Borbor Cashier, Ministry of Commerce and Industry, did knowingly take, misappropriate, convert or exercise unauthorized control over, or make unauthorized transfer of monies and or use of monies with purpose of depriving the owners (Rural Women and the Government of Liberia); and thereafter, conspired, connived, facilitated by committing the Crime, 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, against the Statutory Law of the Republic of Liberia; a felony of the second degree to wit:

1. That, between the time interval of January A.D. 2023, up to and including December, A. D. 2023, in the City of Monrovia, Montserrado County, and in the bailiwick of the Republic of Liberia, You Defendants Mawine G. Diggs, Former Minister, Ministry of Commerce and Industry, Wilfred J.S. Bangura, former Deputy Minister, Ministry of Commerce and Industry, Gudi Neufville, Financial Controller, Ministry of Commerce and Industry, Joseph Yado Howe, former Senior Policy Adviser, Ministry of Commerce and Industry, Kebah Mongar, President National Rural Women Structure of Liberia, Kebbeh Monger, President National Rural Women Structure of Liberia, Elizabeth Finda Sambulah, President Liberia Marketing Association, (LMA), Josephine Handful Greeves, former Secretary, National Rural Women Structure of Liberia, and Kemmoh Borbor Cashier Ministry of Commerce and Industry, in one accord, knowingly connived, conspired and thereafter, took, misappropriated, converted or exercised unauthorized control over and criminally carried away USD\$493,669.38 (Four Hundred Ninety Eighty Three Thousand Six Hundred Sixty Nine United States Dollars Thirty Eight Cent) out of USD\$5,000,000.00 plus LRD\$190,345,28. 26 (One Hundred Ninety Million Three Hundred Four Five Thousand Twenty Eight Liberian Twenty Six Cent), out of the total of LRD\$246,661,614.54, thus depriving the Liberia Rural Women and the Government of Liberia.

2. That, during the fiscal year of A.D. 2023, the then Government of Liberia, made a budgetary allotment of USD\$2,000,000 (Two Million United States Dollar), through the Ministry of Finance to Central Bank of Liberia, representing Rural Women empowerment funds. That herein mentioned funds was intended to support Rural Women Empowerment programs to include and not limited to farmers, marketers, village saving and loan, small & medium enterprise (SME's) among other aspects.

3. That, out the of USD\$2 Million, the Government thought the Ministry of Finance and Development Planning (MFDP), deposited USD\$500,000. 00 (Five Hundred Thousand United States Dollars), plus LRD\$246,661, 614.54 (Two Hundred Forty-Six Million, Six Hundred Sixty-One Thousand, Six Hundred Fourteen Liberian Fifty-Four Cent), into Rural Women Empowerment's funds two (2) separate accounts at the Central Bank of Liberia, as showeth in the below chart for the purpose of monitoring and control by aforesaid Bank.

Account #	Currency	CHQ#	Amount Deposited	Date of Deposit
150-101-138-1	LRD\$	LRD027-899-1	246,661,614.54	Aug 23, A.D.2023
150-202-480-2	USD\$	USD027-899-0	USD\$500,000.00	Aug 23, A.D. 2023

4. That, the aforesaid amount having been deposited, Co-Defendants Mawine G. Diggs, Wilfred J.S. Bangura, and Gudi Neufville, instead of using the identical accounts own and belonging to Rural Women's, opened four (4) separate accounts, at four commercial banks to include; SIBLL (opened August 25, 2023), Ecobank (opened August 25, 2023), GT-Bank (opened August 14, 2023) and LBDI (opened August 23, 2023) with approval from the Ministry of Finance and Development Planning (MFDP). That, all three (3) officials of the Ministry of Commerce and

Industry were made signatories to the accounts in categories, (A, B and C) herein below:

Account #	Currency	Bank	Amount Deposited
001-112-0577-7702	LRD\$	SIBLL	50,025.00LRD
6103033371	LRD	Ecobank	50,000.00LRD
203329112110	LRD	GT Bank	50,270.00LRD
001LRD213-0485-0102	LRD	LBID	50,0000.00LRD
	Grand	Total	LRD\$200,174,395.00

5, That it was established during investigation that, you Defendant's criminal purpose transfer huge portion of monies from Rural Women's Empowerment account with account number;1502024802 at Central of Liberia Bank into Ministry of Commerce and Industry's operation account at the same Bank of Liberia in the below chart.

Account's Number	Date of Transfer/Check	Amount/Currency
150-202-224-8	10/28/2023/274883	USD\$181,938.99
150-202-224-8	9/4/2023/000000001	USD\$61,730.39
N/N	Grand Toal:	USD\$243,669.38

6. Accordingly, AREPT investigation established that, Co-Defendant Mawine G. Diggs, former of Ministry of Commerce and Industry (MOCI), was the sole authorized and approved person with respect to the Commercial Bank accounts from which checks for Rural Women Empowerment Funds were being issued. Hence, authorized all payments and disbursement of said funds.

7. That, AREPT investigation uncovered that, in furtherance to the Defendants' criminal scam involving the theft of the Rural Women Empowerment funds in the FY2023 budget, crafted a purported project Guide contrary to the Rural Women Empowerment's Project Operational Guide Banking Matrix. As mentioned below, indicating the manner and form in which the entity should operate with respect to any donations or allotment of funds

RURAL WOMEN EMPOWERMENT BANKING MARTRIX		
REGION	COUNTIES	BANK
REGION 1	Bomi, Grand Cape Mount, and Gbarpolu	LBDI, SIB
REGION 2	Montserrado, Margibe, and Grand Bassa	ECOBANK, GTBANK
REGION 3	Nimba, Lofa and Bong	LBDI, GTBANK, ECOBANK
REGION 4	Sinoe, Grand Gedeh, and River Cess	SIB BANK
REGION 5	Marylan, Grand Kru and River Cess	ECOBANK

8. That, during AREPT investigation established that Rural Women Empowerment of Liberia original Operational Guide carries the below column referred to as Project Administrative expense.

Property	Description	Amount USD\$
Vehicle/Fifteen (15) Counties	One Toyota SUV	43,000.00
Motorbikes Fifteen (15) pieces	1,000.00 per bike	15,000.00

Fuel	Lumpsum	25,000.00
Local travel DSA	Lumpsum	20,000.00
Publicity	Lumpsum	15,000.00
Office Supplies	Lumpsum	10,000.00
Communication	Lumpsum	5,000.00
Vehicle Insurance	Lumpsum	5,000.00
Grand Total	N/N	USD\$ 140,000.00

9. That, instead of Rural Women's Empowerment of Liberia project administrative expense, you Co- Defendants' Mawine G. Diggs, Wilfred J.S. Bangura and Gudi Neufville to be identified, created additional column and used USD\$77,950.00 (Seventy-Se(Seventy and Nine Hundred Fifty, United States) to illegally purchased the items as showeth below in the chart which was not use by aforesaid Defendants in the implementation of the program.

Vehicles description	Equipment	Purchase Amount USD\$
JACLHD PICKUP T8,4X4	N/N	30,000.00
	VIP-VSA, U8 antenna ACU	47,950.00
	I direct IQ, Muti-Van device,	Total USD\$77,950.00

10. That further investigation report revealed that You Co- Defendant Mawine G. Diggs, along with Defendants, Wildfred J.S. Bangura, Joseph Yado Howe, and Gudi Neufville, to be identified in concert engaged non-beneficiaries, specifically the below listed foreign exchange bureaus and other institutions to include and limited to Mason N Son Business Inc and K. Paris. And thereafter, you Defendants 'began to use these foreign exchange bureaus in conversion of Liberian dollars portion of the monies to United States. That, herein named Defendant's acted contrary to the sole purpose of the Rural Women Empowerment Funds.

Date	Bank	Entity	Currency	Amount	Exchange Rate
19/10/2023	Ecobank	Gateway Forex EX	LRD	10,000,000	USD\$187.44
10/11/2023	GTbank	" " " " " " "	LRD	7,260,000.00	USD\$187.44
19/10/2-23	SIBLL	Zest Group	LRD	14,000.000.00	USD\$187.44
19/10/2023	SIBLL	Zest Group	LRD	14,000.000.00	USD\$187.44
22/11/2023	Ecobank	Gateway Forex Ex	LRD	1,000.000.00	USD\$187.44
18/9/2023		Grand	Total	LRD\$46,260.00	

11. That, as the direct result of the You Defendants' act, the above-mentioned foreign bureaus and institutions received the highest disbursement from Rural Women's funds in the sum of LRD\$28,000.000.00 and LRD\$18,000.000.00, respectively totaling LRD\$53,680,000.00 (Liberian Dollars Fifty-Three Million, Eight Hundred Sixty Thousand) was exchange into United States Dollars. Hence, these entities were purposely, knowingly, criminally and intentionally included with sole purpose to have unauthorized currency exchange control which was in violation of the Rural Women Empowerment established eligibility requirements.

12, Investigation report revealed that You Co- Defendant, Sambulah Elizabeth Finda, President of Liberia Marketing Association (LMA), received and encashed a Central Bank check number: 00000101 in the sum of LRD\$934,700.00 (Nine Hundred Thirty-

Four Thousand Seven Liberian Dollars), on account number: 0010011501011838, under the Rural Women Empowerment Fund maintained at the said bank of Liberia.

13, That, you Co-Defendant having encashed and received the herein amount, without any records of disbursement criminally diverted same into your personal use and benefit, contrary to the sole intent and mandate of the Rural Women Empowerment funds.

14. That, on the 11th day of the month November A.D. 2023, you Co- Defendant Kebah Monger, President of National Rural Women Structure of Liberia, received, encashed a Central Bank check number: 000000263 in the sum of USD\$5,000.00 (Five Thousand United States Dollars), on behalf of said entity for onward disbursement to beneficiaries. Investigation gathered that instead of said disbursement, you Co-Defendant converted same to your personal use out of the detriment of its' much-needed beneficiaries.

15. Further investigation discovered that, You Co-Defendant Kebah Monger, again, knowingly stole, took, carried away and misapplied additional LDR\$51,000, 000.00(Five- One Million Liberian Dollars), from the finance office of the Ministry of Commerce and Industry (MOCI), under the Rural Women Empowerment program. Hence, misused and misapplied side monies contrary to its intended purpose.

16. That, investigation uncovered that on the 19th day of September A.D. 2023, You Co- Defendant Josephine H. Greaves, Secretary of National Rural Women Structure of Liberia signed for three (3) checks from the Ministry of Commerce and Industry (MOCI), as indicated herein.

Check Numbers	Date	Bank	Amount
400275802	Sept.18, 20203	GTBANK	LRD\$3,000,000.00
400275803	Sept. 18, 2023	GTBANK	LRD\$9,000,000.00
000027852	Sept. 18, 2023	SIBLL	LRD\$3,000,000.00
N/N	Grand Total:	N/N	LRD\$15,000,000.00

17. That, you Co- Defendant Josephine H. Greaves, having encashed the total of LDR\$15,000,000.00 (Fifteen Million Liberian Dollars), on behalf of the below Rural Women Structure of Liberia and Counties, criminally demanded 10% from each beneficiary during disbursement.

County	Amount Disubstituted	Percentage Demanded	Amount
Nimba	LRD\$9,000,000.00	10%	LRD\$900,000.00
Maryland	LRD\$3,000,000.00	10%	LRD\$300,000.00
River -Gee	LRD\$3,000,000.00	10%	LRD\$300,000.00
Sinoe	LRD\$3,000,000,00	10%	LRD\$300,000.00
River -Cess	LRD\$3,000.000.00	10%	LRD\$300,000.00
N/N	Grand Total	N/N	LRD\$2,100,000

18. That, you Co-defendant Josephine H. Greaves have therefore willfully and criminally diverted from recipients' money in the total sum of LRD\$2,100,000.00 (Two Million One Hundred Thousand Liberian Dollars), thereby depriving the owners thereof.

19. That, AREPT investigation gathered that, You Co-Defendant Joseph Yado Howe, to be identified, on the 1st day of January A.D. 2023, was hand-picked by Co-Defendant Mawine G. Diggs. And thereafter, signed a "Contractors" agreement with the said Ministry in the position as Senior Policy Advisor for the period of Twelve (12) months from the date mentioned herein up to and including December 31, A.D.2023. Accordingly, while in said position and or capacity, connived and conspired with Co- Defendants; Mawine G. Diggs, Wilfred Bangura J.S., and Gudi J. N. Neufville, and thereafter, stole, took and carried away the above-mentioned monies, thereby depriving the owners thereof.

20. That, the total amount of physical cash that You Defendants Mawine G. Diggs, Wilfred Bangura J.S., Gudi J. N. Neufville, Joseph Yado Howe, Kebbeh Monger, Elizabeth Finda Sambulah, and Josephine H. Greeves, knowingly took misappropriated, converted or exercised unauthorized control over, did steal and carried away the amount of USD\$493.669.38 plusLRD\$190,345,28.26, thereby depriving the Liberia Rural Women and the Government of Liberia.

21. Additionally. Co- defendant, Kemmoh Borbor, cashier at the Ministry of Commerce and Industry on the 27th day of the month of September A.D. 2023, withdrew the amount of LRD\$2,046.000.00 (Two Million Four Six Thousand Liberian Dollars form Rural Women Empowerment Fund. That herein named Co- Defendant used a Central Bank of Liberia check number#00000108. That, investigation found no documentation or explanation indicating the purpose of the withdrawal by Defendant's Borbor.

22, There and then the crime of Theft of Property, you Defendants' Mawine G. Diggs, Wilfred Bangura J.S, Gudi J.N. Neufville, Joseph Yado Howe, Kebbeh Monger, Elizabeth Finda Sambulah, and Josephine Handful Greeves to be identified, did do and commit against the peace and dignity of the Republic of Liberia. That, the herein named Defendants have no affirmative defense.

Chapter 10. Inchoate Offenses: 2.2 Kinds of Culpability

23. 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 it is his purpose to do so.

THEFT OF PROPERTY

24. 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.

25. 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.

26. "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.

27." 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.

28. 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.

29. "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.

30. 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.

31. That, the Defendants' act is contrary to and in violation of Chapter 10. Inchoate Offenses: 2.2 Kinds of Culpability and Chapter 15, Subchapter D, Section 15.51(a)(b)(c) of the new panel of Law.

COUNT TWO: ECONOMIC SABOTAGE: (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 Defendants, Mawine G. Diggs, Former Minister, Ministry commerce and Industry, Wilfred J.S Bangura, and Gudi J. N. Neufville, knowingly stole, took, purloined converted and thereafter, disposed of, used and transferred monies belonging to Liberia Rural Women and the Government of Liberia thereby committing the crime of Economic Sabotage: (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:

32. That, during the period of A.D. 2023, in the City of Monrovia, Montserrado County, the therein supra-Defendants met and knowingly stole, took, purloined converted and thereafter, disposed of, used and transferred the amount of USD UD\$493.669.38 plus LRD\$190,345,28. 26 , belonging to Liberia Rural Women and the Government of Liberia, while serving in various position overlapped and misused and took complete control over the disbursements of the Rural Women Empowerment funds.

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 it is his purpose to do so.

Misuse of Public Money, Property or Record

33-. " 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;

(b) 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.

34. There and then the crime of Misuse of Public Money, Property or Record, the Defendants did do and commit contrary to the peace and dignity of the Republic of Liberia.

35. That, the Defendants' act is contrary to and in violation of Chapter 10. Inchoate Offenses: 2.2 Kinds of Culpability and Chapter 15, Subchapter F, Section 15. 81(a)(b)(c) of the new panel of Law.

COUNT THREE: (MISAPPLICATION OF ENTRUSTED PROPERTY)

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 Defendants, Mawine G. Diggs, Former Minister, Ministry commerce and Industry, Wilfred J.S Bangura, former Deputy Minister, Ministry of Commerce and Industry, Gudi J.N. Neufville, Financial Controller, Ministry of Commerce and Industry, Joseph Yado Howe, former Senior Policy Adviser, Kebbeh Monger, President National Rural Women Structure of Liberia, and Josephine H. Greeves, former Secretary, National Women Structure of Liberia disposed of, used and transferred, monies entrusted to them thereby committing the crime of Misapplication of Entrusted Property, in violation of Chapter 15. , Subchapter D, Section 15. 36 of the new panel of Law, a Misdemeanor of first degree, to wit:

36. That, in A.D. 2023, the above mentioned named Defendants, all officials of the Government of Republic of Liberia at the time, were entrusted with custody of USD\$5000,000 but converted to their personal used and benefit the amount of USD\$493.669.38 (Four hundred ninety Three Thousand United States Dollars) including LRD\$190,345,28. 26 (One Hundred Ninety Million Three Hundred Four Five Thousand Liberian Dollars Twenty Eight Cent), belonging to Liberia Rural

Women from the Government of Liberia intended for Rural Women Empowerment Program.

37. There and then the crime of Misapplication of Entrusted Property, You Defendants, Mawine G. Diggs, Wilfred J.S Bangura, Udi J.N. Neufville, Joseph Yado Howe, Kebbeh Monger, and Josephine Handful Greeve to be identified, did do Commit against the Republic of Liberia.

38. That, the herein named Defendants have no affirmative defense.

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 it is his purpose to do so.

Misapplication of Entrusted Property

39. A person is guilty of a misdemeanor of the first if he disposes of uses or transfers any interest in property which has been entrusted to him as a fiduciary or his capacity as a public Servant or an office of a financial institution, in manner that he knows is not authorized and that he knows to involve a risk of loss or detriment to the owner of the property or to the Government or other person whose benefit the property was entrusted.

40. That, the Defendants' act is contrary to and in violation of Chapter 10. Inchoate Offenses: 2.2 Kinds of Culpability and Chapter 15, Subchapter D, Section 15.

56(a)(b)(c) of the new panel of Law.

COUNT FOUR: (CRIMINAL CONSPIRACY)

That, the special Grand Jury for Montserrado County, Republic of Liberia, upon their oath does Herby, find, more probably than not that, you defendants, Mawine G. Diggs, Former Minister, Ministry commerce and Industry, Wilfred J.S Bangura, Gudi J.N. Neufville, Joseph Yado Howe,, Kebbeh Monger, President National Rural Women Structure of Liberia, and Josephine Handful Greeves, conspired and agreed with one another to the Crimes of Theft of Property, Economic Sabotage: (Misuse of Public money, property or record), and Misapplication of entrusted property did commit 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;

41. That, during the period of A.D. 2023, in the City of Monrovia, Montserrado County, the therein supra-Defendants met, planned, connived and in joined accord, did steal, take and carried away the amount of USD\$ USD\$493.669.38, including LRD\$190,345,28.26 (One Hundred Ninety Million Three Hundred Four Five Thousand Twenty Eight Liberia Dollars Twenty Six Cent), belonging to Liberia Rural Women, entrusted into the Defendant's care for onward disbursement. While serving in various positions at the Ministry of Commerce and Industry (MOCI).

Chapter 10. Inchoate

42. 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 it is his purpose to do so.

Criminal Conspiracy:

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

44. That, the Defendants have no affirmative defense.

45. That, the Defendants' act is contrary to and in violation of Chapter 10. Inchoate Offenses: 2.2 Kinds of Culpability and Chapter 10, Subchapter D, Section 10.4(1)(2) (3)(4) of the new panel of Law.

AND THE GRAND JURORS AFORESAID, UPON THEIR OATH AFORESAID DO PRESENT THAT THE HEREINABOVE NAMED DEFENDANTS AFORESAID, DO SAY THAT THE CRIMES OF THEFT OF PROPERTY, ECONOMIC SABOTAGE: (MISUSE OF PUBLIC MONEY, PROPERTY OR RECORD), MISAPPLICATION OF ENTRUSTED PROPERTY AND CRIMINAL CONSPIRACY, 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.

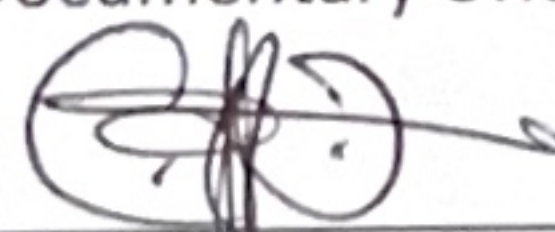
- 1. True Bill (Theft of Property)
TRUE BILL/IGNORAMUS
- 2. True Bill (Economic sabotage/Misuse of Public Money, Property or records)
TRUE BILL/IGNORAMUS
- 3. True Bill (Misapplication Entrusted of Property)
TRUE BILL/IGNORAMUS
- 4. True Bill Criminal Conspiracy)
TRUE BILL/IGNORAMUS

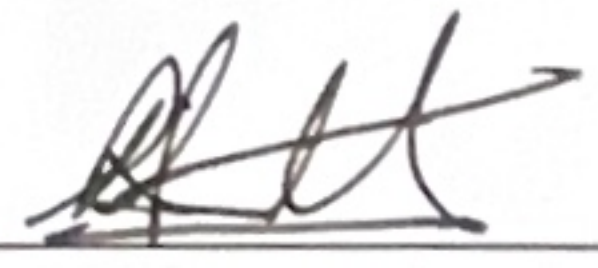
WITNESSES

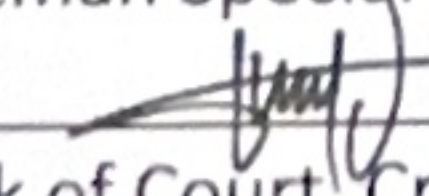
- 1. Augustine Mehn
- 2. Jonh D. Kumeh
- 4. Darlington Dahn
- 5. Others
- 6. Documentary evidence

ADDRESSES

- AREPT
- AREPT
- LRA/AREPT


 Daniel Kerkulah
 Foreman Special Grand Jurors


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


 Clerk of Court, Criminal
 Court "A"

Dated this 13th day of March A.D. 2026.