

FURTHER

AMENDED CHARGE SHEET

8/08/2023

9.53

am/pp

IN THE CIRCUIT COURT "1"

Registrar

ACCRA - A.D. 2023

CIRCUIT COURT ACCRA

Case No.:

04/155/2023

THE REPUBLIC

VERSUS

1. PATIENCE BOTWE
2. SARAH AGYEI
3. BENJAMIN SOWA
4. MALIK DAUDA
5. CHRISTIANA ACHAB
6. JOB POMARY
7. YAHAYA SUMAILA
8. FRANKLIN SAKAKPO (AT LARGE)

COUNT 1

STATEMENT OF OFFENCE

Conspiracy to commit crime, namely Stealing, contrary to sections 23(1) and 124 (1) of the Criminal Offences Act of 1960, [Act 29].

PARTICULARS OF OFFENCE

Patience Botwe, (Hairdresser), Sarah Agyei (unemployed), sometime in the year 2022 at Abelemkpe in the Greater Accra Region and within the jurisdiction of this court did agree and act together with common purpose to commit crime to wit: Stealing.

COUNT 2

STATEMENT OF OFFENCE

Stealing, contrary to section 124 (1) of the Criminal Offences Act of 1960, [Act 29].

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PARTICULARS OF OFFENCE

Patience Botwe, (Hairdresser), Sarah Agyei. (unemployed), sometime in the year 2022 at Abelemkpe in the Greater Accra Region and within the jurisdiction of this court, did dishonestly appropriate cash the sum of Eight Hundred Thousand United States Dollars (\$ 800,000 USD) the property of Cecilia Abena Dapaah.

COUNT 3

STATEMENT OF OFFENCE

Stealing, contrary to section 124 (1) of the Criminal Offences Act Of 1960, [Act 29].

PARTICULARS OF OFFENCE

Patience Botwe, (Hairdresser), Sarah Agyei (unemployed), sometime in the year 2022 at Abelemkpe in the Greater Accra Region and within the jurisdiction of this court, did dishonestly appropriate cash the sum of Two Hundred Thousand United States Dollars (\$ 200,000 USD) the property of Cecilia Abena Dapaah.

COUNT 4

STATEMENT OF OFFENCE

Stealing, contrary to section 124 (1) of the Criminal Offences Act of 1960, [Act 29].

PARTICULARS OF OFFENCE

Patience Botwe, (Hairdresser), Sarah Agyei (unemployed), sometime in the year 2022 at Abelemkpe in the Greater Accra Region and within the jurisdiction of this court, did dishonestly appropriate cash the sum of Three Hundred Thousand Euros (€300,000.00) the property of Cecilia Abena Dapaah.

COUNT 5

STATEMENT OF OFFENCE

Stealing, contrary to section 124 (1) of the Criminal Offences Act, 1960 [Act 29].

PARTICULARS OF OFFENCE

Patience Botwe, (Hairdresser), Sarah Agyei (unemployed), sometime in the year 2022 at Abelemkpe in the Greater Accra Region and within the jurisdiction of this court, did dishonestly

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appropriate cash the sum of Three Hundred and Fifty Thousand Ghana Cedis (GH¢350,000,000) the property of Cecilia Abena Dapaah.

COUNT 6
STATEMENT OF OFFENCE

Stealing, contrary to section 124 (1) of the Criminal Offences Act, 1960 [Act 29].

PARTICULARS OF OFFENCE

Sarah Agyei (Unemployed), sometime in the year 2022 at Abelemkpe, in the Greater Accra Region and within the jurisdiction of this court, did dishonestly appropriate assorted Jewelries value at Ninety-five Thousand Dollars (\$95,000.00) the property of Cecilia Abena Dapaah.

COUNT 7
STATEMENT OF OFFENCE

Dishonestly receiving, contrary to section 146 of the Criminal Offences Act, 1960 [Act 29].

PARTICULARS OF OFFENCE

Benjamin Sowah (Plumber), sometime in the year 2023, at Accra in the Greater Accra Region and within the jurisdiction of this court, you dishonestly received cash an amount of One Hundred and Eighty Thousand Ghana Cedis (GH¢180,000.00) from Patience Botwe, the property of Cecilia Abena Dapaah, which you knew have been obtained by means of crime to wit stealing.

COUNT 8
STATEMENT OF OFFENCE

Dishonestly receiving, contrary to section 146 of the Criminal Offences Act, 1960 [Act 29].

PARTICULARS OF OFFENCE

Malik Dauda (unemployed), during the year 2022, at Accra in the Greater Accra Region and within the jurisdiction of this court, you dishonestly received cash of One Hundred Thousand

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Ghana Cedis (GH¢100,000.00) from Sarah Agyei through Patience Botwe, the property of Cecilia Abena Dapaah, which you knew have been obtained by means of crime to wit stealing.

COUNT 9
STATEMENT OF OFFENCE

Dishonestly receiving, contrary to section 146 of the Criminal Offences Act, 1960 [Act 29].

PARTICULARS OF OFFENCE

Malik Dauda (unemployed), during the year 2022 in Accra in the Greater Accra Region and within the jurisdiction of this court, you dishonestly received Five Thousand Ghana Cedis (GH¢5,000.00) from Patience Botwe, the property of Cecilia Abena Dapaah, which you knew have been obtained by means of crime to wit stealing.

COUNT 10
STATEMENT OF OFFENCE

Dishonestly receiving, contrary to section 146 of the Criminal Offences Act, 1960 [Act 29].

PARTICULARS OF OFFENCE

Christiana Achab (trader), Job Pomary (mechanic), during the year 2023 in Accra in the Greater Accra Region and within the jurisdiction of this court, you dishonestly received Three Hundred Thousand Ghana Cedis (GH¢300,000.00) from Patience Botwe, the property of Cecilia Abena Dapaah, which you knew have been obtained by means of crime to wit stealing.

COUNT 11
STATEMENT OF OFFENCE

Dishonestly receiving, contrary to section 146 of the Criminal Offences Act, 1960 [Act 29].

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PARTICULARS OF OFFENCE

Christiana Achab (trader), during the year 2023 in Accra in the Greater Accra Region and within the jurisdiction of this court, you dishonestly received Eight Hundred Thousand Ghana Cedis (GH¢800,000.00) from Patience Botwe, the property of Cecilia Abena Dapaah, which you knew have been obtained by means of crime to wit stealing.

COUNT 12
STATEMENT OF OFFENCE

Dishonestly receiving, contrary to section 146 of the Criminal Offences Act, 1960 [Act 29].

PARTICULARS OF OFFENCE

Christiana Achab (trader), during the year 2022 in Accra in the Greater Accra Region and within the jurisdiction of this court, you dishonestly received Three Hundred Thousand Ghana Cedis (GH¢300,000.00) from Patience Botwe, the property of Cecilia Abena Dapaah, which you knew have been obtained by means of crime to wit stealing.

COUNT 13
STATEMENT OF OFFENCE

Dishonestly receiving, contrary to section 146 of the Criminal Offences Act, 1960 [Act 29].

PARTICULARS OF OFFENCE

Christiana Achab, (Trader), Franklin Sarakpo (at large), during the year 2022 in Accra in the Greater Accra Region and within the jurisdiction of this court, you dishonestly received Three Hundred Thousand Ghana Cedis (GH¢300,000.00) from Patience Botwe, the property of Cecilia Abena Dapaah, which you knew have been obtained by means of crime to wit stealing.

COUNT 14
STATEMENT OF OFFENCE

Dishonestly receiving, contrary to section 146 of the Criminal Offences Act, 1960 [Act 29].

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PARTICULARS OF OFFENCE

Christiana Achab (Trader), Yahaya Sumaila (Excavator Operator), during the year 2023 in Accra in the Greater Accra Region and within the jurisdiction of this court, you dishonestly received Eight Hundred and Fifty Thousand Ghana Cedis (GH¢850,000.00) the property of Cecilia Abena Dapaah, which you knew have been obtained by means of crime to wit stealing.

DATED AT LEGAL & PROSECUTION DEPT., CID HEADQUARTERS, ACCRA THIS
8TH DAY OF AUGUST, 20223.


DSP. Emmanuel Nyamekye

THE REGISTRAR
CIRCUIT COURT
ACCRA

BRIEF FACTS

Complainants in this case are Daniel Osei Kufour and his wife Cecilia Abena Dapaah who resides at Abelemkpe, Accra. First accused (A1) Patience Botwe @ Maabena was a house help to the complainants. Second accused (A2) Sarah Agyei is unemployed and a former house help to the complainants. Third accused (A3) Benjamin Sowah is a boyfriend to A1. Fourth accused (A4) Malik Dauda is A1's former boyfriend. Fifth accused (A5) Christiana Achab is a trader. Sixth accused (A6) Job Pomary is the husband of A5, seventh accused Yahaya Sumaila (A7) is an excavator operator residing at Sagnarigu in the Tamale Metropolis and eighth accused Franklin Sarakpo (A8) who is on the run, is the son of A5.

Sometime in June 2023, the complainants reported theft of their cash and some personal effects as indicated on the face of the charge sheet. Upon the receipt of the complaint, Police commence investigations into the complaint. Police investigations led to the arrest of A1 and A3 at their hide out in Tamale in the Northern Region. A search conducted in their room revealed cash the sum of \$40,000 USD and GH¢72,619.70. Police investigation revealed that, sometime in October 2022, complainant Daniel Osei Kufour returned from town to observe that their bedroom which was locked had been opened and heard an unusual noise therein. He entered the room and found A1 hiding behind Complainants storeroom door with duplicate keys to the complainant's master's bedroom.

Subsequently, the complainants detected theft of properties indicated on the face of the charge sheet. A1 indicated during interrogation that, she gave Seventy Thousand Dollars (\$70,000) UDS out of the stolen money to A5 to buy a three-bedroom house at Amrahia for her. The following brand-new items which A1 used some of the stolen money to buy were also retrieved from the said house: One double decker refrigerator, one television set, one washing machine, one chest freezer, one gas cooker, one water dispenser and related items. Police investigation also established that A1 and A3 used some of the stolen money to buy Hyundai Elantra with registration number GE 9771-23 at a cost of Eighty Thousand Ghana Cedis (GH¢80,000.00). A1 also gave One Hundred and Eighty Thousand Ghana Cedis (GH¢180,000.00) to A3 who used same to purchase an unregistered Honda Civic car with DV plate number 4903-23 which same have been retrieved. Investigation also disclosed that A1 and A3 used parts of the stolen money to rent a three-bed room apartment in Tamalé at a total cost of One Hundred and Five Thousand

Six Hundred Cedis (GH¢105,600.00) for a period of two years. Additionally, A1 and A3 used part of the stolen money to rent a storeroom in Tamale at a total cost of One Hundred Twenty Thousand Ghana Cedis (120,000.00).

A1 also mentioned A2 as her accomplice to the effect that, when they were working in the complainants' house, she used to keep watch of the main gate for A2 to go into the complainants' room to steal their money after which they share the spoil. A2 was subsequently arrested from her hideout in Budumburam a suburb of Kasoa for investigation. Investigation further disclosed that A2 used part of the stolen money to build a three bedroom self-contain house at Budumburam. A1 also gave Five Thousand Ghana Cedis (GH¢5,000.00) out of the stolen money to A4, who admitted the preceding fact during interrogation. A2 also gave One Hundred Thousand Ghana Cedis (GH¢100,000.00) out of the stolen money to A4 through A1 who also admitted same. A5, A6 and A8 who were wanted for their involvement in the case were arrested for investigation.

Further investigation revealed that A1 gave unspecified amount of money in dollars to her deceased brother "Joe" who also parted some of the stolen money to A5 who was living in a wooden structure with her husband within the same locality as A1. A5 who knew that A1 had stolen money from the complainants collected a total amount of Two Million Eight Hundred and Thirty Thousand Ghana Cedis (GH¢2,830,000.00) of the stolen money from A1. A5 upon receipt of the said amount, purchased an eleven-unit chamber and hall self-contain house at Budumburam at the cost of Eight Hundred Thousand Ghana Cedis (GH¢800,000.00) for herself. A5 again purchased a three-bedroom house at Aplaku at the cost of Three Hundred Thousand Cedis (GH¢300,000.00) also for A1. A5 and A6 also purchased a four-bedroom house at Kokrobite at the cost of Two Hundred and Eighty Thousand Cedis (GH¢280,000.00) for A5. A5 called A7 from Tamale and purchased a three bedroom self-contain house at Amrahia at the cost of Eight Hundred and Fifty Thousand Cedis (GH¢850,000.00) in the name of A7.

Investigation further disclosed that, A5 purchased two Honda Acura vehicles with registration numbers GB1407-2022 and GB 1406-22 at the cost of Three Hundred Thousand Ghana Cedis (GH¢300,000.00) each which are registered in the name of A8 and A1 respectively from the proceeds. Case under investigation.

