

REPUBLIC OF LIBERIA)
MONTSERRADO COUNTY)

IN THE FIRST JUDICIAL CIRCUIT CRIMINAL
ASSIZES “A” FOR MONTSERRADO COUNTY,
SITTING IN ITS’ MAY TERM A.D. 2025

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

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

- CRIMES:**
- 1.Theft of Property,
 - 2. Economic Sabotage (Misuse of Public Money, Property or Records; Theft and/or illegal disbursement and expenditure of public money (b)(c),
 - 3. Misapplication of entrusted Property, 4. Abuse of office
 - And 5. Criminal Conspiracy

VERSUS
Mary Broh, former Director General
General Services Agency, Dee-Maxwell
Saah Kemayah, former Minister of Foreign
Affairs, Varney A. Sirleaf, Former Minister
Of Internal Affairs, Thelma Sawyer, former
Deputy of Foreign Affairs/Administration,
Augustine Tamba, Deputy Director for Ops.,
NDMA, Augustine Kollie, Director for Disaster
Victims, NDMA, Henry O. Willaims, former
Executive Director, NDMA, Edward S. Konneh,
Employee, NDMA, Archievego M. Doe, NDMA
Communications Director, Edris Bility, former
GSA Deputy Director/Ops, Mamie Davies,
Assistant Director, GSA, Momolu Johnson,
Deputy Minister of Internal Affairs/Adm.,
Rosetta L. Gbassay Bowah, Logistics Officer,
NDMA, Wayfa Ciapha, purported CEO, Group of
Seventy-seven, Evelyn Gbee, Warehouse
Manager and others to be identified, **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 do hereby find more probably than not, that, the Defendants, Dee-Maxwell Saah Kemayah, former Minister of Foreign Affairs, Mary Broh, Former Director General, General Services Agency, Varney A. Sirleaf, former Minister of Internal Affairs, Thelma Sawyer, former Deputy of Foreign Affairs/Administration

Augustine Tamba, Deputy Director for Ops., NDMA, Augustine Kollie, Director for Disaster Victims, NDMA, Henry O. Willaims, former Executive Director, NDMA, Edward S. Konneh, Employee, NDMA, Archievego M. Doe, NDMA Communications Director, Edris Bility, former GSA Deputy Director/Ops, Mamie Davies, Assistant Director, GSA, Momolu Johnson, Deputy Minister of Internal Affairs/Administration, Rosetta L. Gbassay Bowah, Logistics Officer, NDMA, Wayfa Ciapha, purported CEO, Group of Seventy-seven, Evelyn Gbee, Warehouse Manager and others to be identified, 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, between the period of February 21, up to and including April A.D. 2025, Defendants Dee- Maxwell Saah Kemayah, Henry O. Williams, Varney A. Sirleaf, Archievego M. Doe, Edward S. Konneh, Augustine Kollie, Momolu Johnson, Memie Davis, Edris Bility, and Rosetta L. Gbassay Bowah, to be identified. That the herein Defendants were invited by special investigation team of Assets Recovery and Property Retrieval Task Force (AREPT), acquainted with their Constitutional Rights, represented by their various legal Counsels, thoroughly investigated and subsequently charged for the collective involvement into the commission of the crimes of Theft of Property, Economic Sabotage, Criminal Conspiracy, Criminal Facilitation, Misapplication of Entrusted Property and Misuse of Public Money, Property or record, respectively.

2.That, the Defendants’ collective involvement caused the Government of Liberia to sustain the loss of 25,054 bags value at USD\$425,918, (Four Hundred Twenty Thousand Nine Hundred Eighteen United States Dollars). Out of the 29, 412(25kg bags of the rice), donated to the Government of Liberia by the Kingdom of Saudi Arabia through Fouta Corporation INC, during the time interval of April A.D. 2023, intended for disaster communities and their its victims.

3. The, Kingdom of Saudi Arabia on April 4, A.D. 2023, saw the need and donated to the Government of the Republic of Liberia, (29, 412), 25kg bags of rice valued at USD\$500,000. And after the said donation, the rice was placed into three (3) separate warehouses as follows:

1. warehouse # 1 GSA.....	11,200 25kg bags
2. warehouse #2 NDMA.....	12,292, 25kg bags
3.warehouse #3 NDMA.....	<u>5,920 25kg bags</u>
	29, 412, (25kg bags)

4. That, 11,200 bags of the rice were transferred to one of G.S.A. warehouses, intended for onward safe keeping and gradual distribution by National Disaster Management Agency (N.D.M.A), inclusive of the 18,212 bags at the time in the warehouses of NDMA. That, while gradual distribution was being done by NDMA authority, Co- Defendant, Dee- Maxwell Saah Kamayah and Thelma Sawyer, left their respective offices at the Ministry of Foreign, overlapped their functions and or positions as Minister and Deputy Minister respectively by usurping the

functions of the Board of the National Disaster Management Agency (NDMA) and making decisions regarding the said donation.

5. Thereafter, called and held three (3) meetings in the compound of GSA, UN Drive, with Defendants, Mary Broh, former Director General, General Services Agency (GSA), Varney A. Sirleaf, former Minister of Internal Affairs (MIA), Henry O. Williams, former Executive Director National Disaster Management Agency (NDMA) and Momolu S. Johnson, former Deputy Minister for Administration, Ministry of Internal Affairs (MIA).

6. That, at one of the Defendants' purported meetings, it was agreed and decided that (13,895), Thirteen Thousand Eight Hundred Ninety-Five bags of the rice be transferred to GSA warehouse. The second transferred was done through the influenced and agitation of Co- Defendants' Dee-Maxwell Saah Kamayah and Thema E. Sawyer, with the purpose and intent to have same wrongfully distributed to Defendants' personal interest and benefit.

7. Assets Recovery and Property Retrieval Task Force (AREPT) investigation's report revealed that herein named Defendants having taken control over the 25,095 bags, Co-Defendant Dee-Maxwell Saah Kamayah, instructed and unlawfully diverted said distribution from NDMA and placed Co-Defendant Varney A Sirleaf to be identified in charged. Thus, left the National Disaster Management Agency, charged with the statutory responsibility to manage and control all disaster related activities in the Republic of Liberia out of its functions and the functions of the Board of said entity.

8. In furtherance to the commission of the crime of theft, Co-Defendant Varney A. Sirleaf, under the direct instructions of Defendants; Dee- Maxwell Saah Kamayah and Thelma Sawyer, began to wrongfully authorized the distribution of the (25,095 bags) from GSA warehouse to individuals and or persons of their interest to the detriment of the Government of Liberia, and disaster victims as well.

9. That, Co-Defendant Mary Broh to be identified, former GSA Director General, while in possession of the 25,054 bags, overlapped her function and went into the warehouses at the said entity. And therefrom, stole, took and carried away 1,050 (One Thousand Fifty bags) under the pretext of distributing same to disaster victims, without documentary evidence to account with regards to the recipient's and or records to indicate the rightful distribution as per the purpose of the donation.

10. That, both Co-defendants, Edris Bility, former Deputy Director for Operation, General Services Agency (G.S.A.) and Augustine Tamba, former Deputy Executive Director for Operation, National Disaster Management Agency (N.D.M.A), took and carried away 4,000.00 (Four Thousand bags of the rice) from GSA warehouse under the scheme of distribution and same cannot be accounted for. Additionally, Co-Defendant Edward S. Konneh criminally took and carried away 5,595 bags of rice under the pretense of distributing them to communities without any records to show that the distributions were rightful.

11. More besides, after the 13,895 bags as mentioned above was transferred to G.S.A, Co- Defendant Henry O. Williams, former Executive Director of NDMA, was left in charge of 4,317 bags. Investigation report further revealed that, the now Executive Director, Ansu Dolley, accordingly met only 720 bags upon taking over. Therefore, Co-Defendant Henry O. Williams to be identified, misapplied, stole, took and carried away the 4,317 bags, as mentioned herein.

12. That, you Co- Defendant Archievego M. Doe to be identified, while serving within the employ of the National Disaster Management Agency, as Communication Director or media officer, went beyond said responsibility and wrongfully, received, took, carried away and or misapplied 250 bags under the pretext of distributing thereof.

13. That, on the 19th day of month of March A.D. 2025, Co-Defendant Augustine M. Kollie to be identified, appeared before the Assets Recovery and Property Retrieval Task Force special investigation team, along with his counsel, Cllr. T. Joseph Debblay. That during the investigation, Co-Defendant Augustine M. Kollie, to be identified, admitted to unjustifiable distribution of 4,282 bags, without beneficiaries' records of rightful distribution.

14. Additionally, the herein named Co-Defendant Augustine M. Kollie, in his statement, admitted to order, supervise and pre-position the released and or removal of 5,000.00 bags out of which 4,000.00 bags were squandered by both Edris Bility and Augustine Tamba. Accordingly, Co-Defendant Augustine M. Kollie, informed the investigation that after the 5,000 bags were released, the said Defendant was instructed by Co- Defendant Augustine Tamba, to recuse himself from the process that led to the status of same.

15. That, at the same time, Co-Defendant Rosetta Gbassay Bowah, serving as logistic officer, took and carried away 1,000 bags out the 5000 bags pre-position by Augustine M. Kollie, thereby depriving disaster victims and or the Republic of Liberia out of the gainful use and benefit of said property.

16. That, Co-Defendant, Wayfa Ciapha criminally took and carried away 1,760 bags under false pretext of distributing same to Group 77 communities or members without any records of distribution and same cannot be accounted for.

17. That, the total value the of properties and or rice jointly stolen, misapplied, taken and carried away illegally and criminally by Defendants' Mary Broh, Dee-Maxwell Saah Kamayah, Varney A. Sirleaf, Henry O. Williams, Edris Bility, Augustine Tamba, Augustine Kollie, Momolu Johnson, Archievego M. Doe, Thema E. Sawyer, Wayfa Ciapha and Edward S. Konneh, Memie Davis and Rosetta Gbassay Bowah, Evelyn Gbee and others to be identified, is 25,054 Saudi Arabia's donated rice, valued at USD\$425, 918.00 (Four Hundred Twenty-Five Thousand Nine Hundred Eighteen United States Dollars).

18. There and then, the crime of Theft of Property, Defendants' Mary Broh, Dee-Maxwell Saah Kamayah, Varney A. Sirleaf, Henry O. Williams, Edris Bility, Augustine Tamba, Augustine Kollie, Momolu Johnson, Archievego M. Doe, Thema E. Sawyer, Wayfa Ciapha and Edward S. Konneh, Memie Davis, Rosetta

Gbassay Bowah, Evelyn Gbee and others to be identified, did do and commit against the peace and dignity of the Republic of Liberia.

19, 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.

20. 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.

21. “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.

22.” 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.

23. 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.

24. “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.

25. 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 TWO

ECONOMIC SABOTAGE-Theft and/or illegal disbursement and expenditure of public money (b)(c)

That, the Special Grand Jurors for Montserrado County, Republic of Liberia upon their oath do hereby find more probably than not, that the defendants, Dee-

Maxwell Saah Kemayah, former Minister of Foreign Affairs, Mary Broh, Former Director General, General Services Agency, Varney A. Sirleaf, former Minister of Internal Affairs, Thelma Sawyer, former Deputy of Foreign Affairs/Administration Augustine Tamba, Deputy Director for Ops., NDMA, Augustine Kollie, Director for Disaster Victims, NDMA, Henry O. Williams, former Executive Director, NDMA, Edward S. Konneh, Employee, NDMA, Archievego M. Doe, NDMA Communications Director, Edris Bility, former GSA Deputy Director/Ops, Mamie Davies, Assistant Director, GSA, Momolu Johnson, Deputy Minister of Internal Affairs/Administration, Rosetta L. Gbassay Bowah, Logistics Officer, NDMA, Wayfa Ciapha, purported CEO, Group of Seventy-seven, Evelyn Gbee, Warehouse Manager and others to be identified, did conspire, and did commit the Crime of Economic Sabotage (**Misuse of Public Money, Property or Record; Theft and/or illegal disbursement and Expenditure of Public Money (b)(c)**), in flagrant violation of 4 LCLR, Title 26, Section 15.81 (c); and 4 LCLR, Title 26, Section 2.2 (a) and (b); and 4 LCLR, Title 26, Section 15.82 (b), of the Statutory Law of the Republic of Liberia.

26. That, Co-Defendants' Dee-Maxwell Saah Kemayah, Mary Broh, Varney A. Sirleaf, Augustine Tamba, Henry O. Williams, Edward S. Konneh, Archievego M. Doe, Edris Bility, Momolu Johnson, and Thema E. Sawyer to be identified, while within the employ of the Government of Liberia and assigned in various positions at the Ministry of Foreign Affairs, Ministry of Internal Affairs, National Disaster Management Agency (NDMA) and General Services Agency (GSA) respectively. Did not maintain records and or documentation, with regards to whether or not their involvement into the Saudi Arabia donated 500,000.00 25kg bags of rice had any legal and justifiable reason and or reasons.

27. That, during the period of A.D. 2023, in the City of Monrovia, Montserrado County, Republic of Liberia, Defendants' Dee-Maxwell Saah Kemayah, Mary Broh, Varney A. Sirleaf, Augustine Tamba, Henry O. Williams, Edward S. Konneh, Archievego M. Doe, Edris Bility, Momolu Johnson, Evelyn Gbee and Thema E. Sawyer, interfered into the distribution of 25,054 bags out of the 29,412 Saudi Arabia donated rice to Liberia, intended for disaster victims. That, the Defendants overlapped their various functions, connived, colluded, designed and developed scheme, diverted therefrom the purposed of the donated rice, hence, transferred, knowingly, steals, purloin, or converts to their own and benefit or the use of another person properties 25,054 bags of rice at USD\$425,918.00.

28. In addition to the defendant's criminal scheme, multiple transferred were made to several individuals and other purported localities accordingly without any end- users records indication. Thereby depriving disaster communities, victims, and Government of Liberia (GOL), out of its' much-needed transparency distribution of said rice.

29. There and then the crime of Economic Sabotage, you defendants' Dee-Maxwell Saah Kemayah, Mary Broh, Varney A. Sirleaf, Augustine Tamba, Henry O. Willaims, Edward S. Konneh, Archievego M. Doe, Edris Bility, Momolu Johnson and Thema E. Sawyer to be identified, did do and commit during the period as mentioned above.

Economic Sabotage- Theft and/or illegal disbursement and expenditure of public money (b)(c)

A person is guilty of a first-degree felony, if he

b); knowing takes, misappropriates, converts, or exercises unauthorized control over; or makes unauthorized transfer of an interest in the property of another or the Government of Liberia, with the purpose of depriving the owner thereof or purposely deprives another of his property by deception, or by treats;

c) Disposes of, uses or transfer any interest in property which has been entrusted to him as a fiduciary, and in his capacity as a public servant or nay officer of an institution, in a manner he knows is not authorized and that he knows to involve risk of loss or detriment of the owner of the property or the Government of Liberia or other person for whose benefit the property was entrusted.

30. A person engages in conduct purposely 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.

ECONOMIC SABOTAGE-MISUSE OF PUBLIC MONEY, PROPERTY OR RECORD (a)(b)

31. That, you defendants, Dee-Maxwell Saah Kemayah, former Minister of Foreign Affairs, Mary Broh, Former Director General, General Services Agency, Varney A. Sirleaf, former Minister of Internal Affairs, Thelma Sawyer, former Deputy of Foreign Affairs/Administration Augustine Tamba, Deputy Director for Ops., NDMA, Augustine Kollie, Director for Disaster Victims, NDMA, Henry O. Willaims, former Executive Director, NDMA, Edward S. Konneh, Employee, NDMA, Archievego M. Doe, NDMA Communications Director, Edris Bility, former GSA Deputy Director/Ops, Mamie Davies, Assistant Director, GSA, Momolu Johnson, Deputy Minister of Internal Affairs/Administration, Rosetta L. Gbassay Bowah, Logistics Officer, NDMA, Wayfa Ciapha, purported CEO, Group of Seventy-seven, Evelyn Gbee, Warehouse Manager and others to be identified, 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.

32. That, the above-mentioned Defendants Knowingly stole, took, purloined, or converted to their own use and benefit or the use rice denoted to the Liberian for disaster victims and or overlapped and misused their various

positions, took complete control over the Saudi's rice distribution, transferred, steal, take and carried away bags of rice valued USD426,898.00.

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.

Economic Sabotage-Misuse of Public Money, Property or Record (a)(b)

"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 or 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.

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

34. That, the Defendants have no affirmative defense.

COUNT THREE (3)- (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, Dee-Maxwell Saah Kemayah, former Minister of Foreign Affairs, Mary Broh, Former Director General, General Services Agency, Varney A. Sirleaf, former Minister of Internal Affairs, Thelma Sawyer, former Deputy of Foreign Affairs/Administration Augustine Tamba, Deputy Director for Ops., NDMA, Augustine Kollie, Director for Disaster Victims, NDMA, Henry O. Willaims, former Executive Director, NDMA, Edward S. Konneh, Employee, NDMA, Archievego M. Doe, NDMA Communications Director, Edris Bility, former GSA Deputy Director/Ops, Mamie Davies, Assistant Director, GSA, Momolu Johnson, Deputy Minister of Internal Affairs/Administration, Rosetta L. Gbassay Bowah, Logistics

Officer, NDMA, Wayfa Ciapha, purported CEO, Group of Seventy-seven, Evelyn Gbee, Warehouse Manager and others to be identified, did do and commit 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:

35.That, during the period of April A.D. 2023, the Kingdom of Saudi Arabia saw the need for an assistant to the Government and people of the Republic of Liberia. And such donated to the Republic of Liberia, through Fouta Corporation INC, 29,412 (25kg bags of rice), valued at USD\$500,000.00 (Five Hundred Thousand United States Dollars). That, the aforesaid rice was turnover to Co-Defendant Henry O. Williams, former Executive Director of National Disaster Management Agency (NMDA).

36.That, Co- Defendant, Henry Williams, having received the 29,412 bags, same were placed into three warehouses as follows:

- a) Warehouse # 1 GSA.....11,200 25kg bags
- b) 2. warehouse #2 NDMA.....12,292, 25kg bags
- c) 3.warehouse #3 NDMA.....5,920 25kg bags
- d) Total: 29, 412, (25kg bags),**
for onward gradual distribution to disaster victims as per the intended purpose in which said rice was being donated.

37.That, while the rice was in these warehouses, Defendant Mary Broh, Henry O. Willaims, Augustine Tamba, Augustine M. Kollie, Edward S. Konneh, Archievego M. Doe, Edris Bility, Momolu Johnson, Memie Davis Rosetta Gbassay Bowah, Wayfa Ciapha, Everlyn Gbee, and Varney A. Sirleaf to be identified, serving within the employ of the Government of Republic in various fiduciary capacity, misapplied and disposed of 25,054 bags out of the 28.412 bags valued at USD\$425,918.00.

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.

Misapplication of Entrusted Property

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.

COUNT FOUR (ABUSE OF OFFICE)

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, Dee-Maxwell Saah Kemayah, former Minister of Foreign Affairs, Mary Broh, Former Director General, General Services Agency, Varney A. Sirleaf, former Minister of Internal Affairs, Thelma Sawyer, former Deputy of Foreign Affairs/Administration and others to be identified, did do and commit the crime of Abuse of Office, in violation of Chapter 12., Subchapter E, Section 12. 70 (b) a of the new panel of Law, a Misdemeanor of first degree, to wit:

38. That, during the time interval of April A.D. 2020, in the City of Monrovia, Montserrado County, Republic of Liberia, Defendants' Dee-Maxwell Saah Kemayah, former Minister of Foreign Affairs, Mary Broh, Former Director General, General Services Agency, Varney A. Sirleaf, former Minister of Internal Affairs, Thelma Sawyer, former Deputy of Foreign Affairs/Administration and others to be identified, committed the herein mentioned crime against the peace and dignity of the Republic. That Co-Defendants Dee-Maxwell Saah Kamayah, Thelma Sawyer and others to be identified, at the time serving as Minister of Foreign Affairs and Deputy Minister respectively, overlapped and abused the function of said office, called three meetings, along with Defendants Mary Broh, Momolu Johnson and Varney A. Sirleaf, former Minister of Internal Affairs regarding the rice donated to Government of Liberia for disaster victims by the Saudi Government. A meeting that was outside and or violated the Act establishing the National Disaster Management Agency that is managed and operated by a Board's decision.

39. Thereafter, you Defendant Dee- Maxwell Saah Kamayah, transfer and diverted the distribution of 13,895 bags of the Saudi donated rice from National Disaster Management Agency NMDA to GSA. Hence, placed Co-defendant Varney A. Sirleaf, in charge of the distribution process. There and then the crime of Abuse of Office, the herein named Defendants did do and commit. Against the peace and dignity of the Republic of Liberia.

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.

Official Oppression

A person acting or purporting to act in an official capacity of taking advantage of such actual or purported capacity commits a first-degree misdemeanor if he

knowingly. (b) Denies or impedes another in the exercise of enjoyment of any right, privileges, power of immunity.

COUNT FIVE (5)- (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, Dee-Maxwell Saah Kemayah, former Minister of Foreign Affairs, Mary Broh, Former Director General, General Services Agency, Varney A. Sirleaf, former Minister of Internal Affairs, Thelma Sawyer, former Deputy of Foreign Affairs/Administration Augustine Tamba, Deputy Director for Ops., NDMA, Augustine Kollie, Director for Disaster Victims, NDMA, Henry O. Willaims, former Executive Director, NDMA, Edward S. Konneh, Employee, NDMA, Archievego M. Doe, NDMA Communications Director, Edris Bility, former GSA Deputy Director/Ops, Mamie Davies, Assistant Director, GSA, Momolu Johnson, Deputy Minister of Internal Affairs/Administration, Rosetta L. Gbassay Bowah, Logistics Officer, NDMA, Wayfa Ciapha, purported CEO, Group of Seventy-seven, Evelyn Gbee, Warehouse Manager and others to be identified, conspired with one another collectively and or severally to have 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;

40. That, some time ago, 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, makes several transferred of 25,054 bags out of the 29,412 Saudi Arabia donated rice valued at USD\$425,918.00 (Four Hundred Twenty-Five Thousand Nine Hundred Eighteen United States Dollars. There and then the crime of Criminal Conspiracy, you defendant, did do and commit. 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.

Criminal Conspiracy:

A person is guilty to commit 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.

41. That, the Defendants have no affirmative defense.

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 (MISUES OF PUBLIC MONEY, PROPERTY OR RECORD; THEFT AND/OR ILLEGAL DISBURSEMENT AND EXPENDITURE OF PUBLIC MONEY (b)(c)) MISAPPLICATION OF ENTRUSTED PROPERTY, ABUSE OF OFFICE 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. _____ (Theft of Property)
TRUE BILL/IGNORAMUS
2. _____ (Economic Sabotage (Misuse of Public Money,
TRUE BILL/IGNORAMUS Property or record; **Theft and/or illegal disbursement
and expenditure of public money)**
3. _____ (Misapplication of Entrusted Property)
4. _____ (Abuse of office)
TRUE BILL/IGNORAMUS
5. _____ (Criminal Conspiracy)
TRUE BILL/IGNORAMUS

- WITNESSES
- 1.Insp. John D. Kumeh
2.C/Insp. Augustine Mehn
3. Darlington Dahn
4. ACP. Rafell A. Wilson
5.Others
6. Documentary evidence

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

Alethelia Grasco Korvah
Forelady/ Special Grand Jurors

Cllr. Jerry D. K. Garlawolu
Assistant Minister of Justice for
Litigation/MOJ

Clerk of Court, Criminal
Court “A”

Dated this _____ day of _____ A.D. 2025.

