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OFFICE OF THE ATTORNEY-GENERAL AND MINISTRY OF JUSTICE
PROSECUTIONS DIVISION
P. O. BOX MB 60
ACCRA

IN THE SUPERIOR COURT OF JUDICATURE
IN THE HIGH COURT
(GENERAL JURISDICTION)
ACCRA – A.D. 2025.

SUIT NO.: CR/0418/2025

THE REPUBLIC

VERSUS

KWABENA ADU-BOAHENE	**1ST ACCUSED PERSON**
ANGELA ADJEI BOATENG	**2ND ACCUSED PERSON**
MILDRED DONKOR	**3RD ACCUSED PERSON**
ADVANTAGE SOLUTIONS LIMITED	**4TH ACCUSED PERSON**

NOTICE OF WITHDRAWAL FROM PROSECUTION

TAKE NOTICE that the Honourable Attorney-General has, pursuant to Section 59 of the Criminal and other Offences (Procedure) Act, 1960 (Act 30), withdrawn MILDRED DONKOR, the 3rd Accused Person herein, from prosecution in respect of all the charges brought against her in this case.

DATED AT THE OFFICE OF THE ATTORNEY-GENERAL, THE LAW HOUSE, LIBERIA ROAD, ACCRA, THIS 15TH DAY OF OCTOBER, 2025.

....
HON. DR. JUSTICE SREM-SAI
Deputy Attorney-General

AND FOR THE SERVICE ON THE ABOVE-MENTIONED ACCUSED PERSONS OR THEIR LAWYERS.

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THE REPUBLIC

VERSUS

KWABENA ADU-BOAHENE	**A1**
ANGELA ADJEI BOATENG	**A2**
ADVANTAGE SOLUTIONS LIMITED	**A4**

PROSECUTION WITNESS STATEMENT OF MILDRED DONKOR

1. My name is MILDRED DONKOR. I live at Oyarifa. Oyarifa is a suburb of Accra. Currently, I am self-employed. Immediately before I became self-employed, I worked with **A1** and **A2**, helping them to run the affairs of their businesses (including **A4**'s businesses). Immediately before working with the Accused Persons, I worked at the Universal Merchant Bank Limited (hereinafter known as "UMB") in Accra. I worked there from **July 2007**, up until sometime in **July 2018**. I worked there, first, as a teller and, later, as a salesperson.

2. I know **A1** and **A2**. I also know **A4** – the company. I got to know them at the Cedar Mountain Assembly of the Assemblies of God Church (hereinafter known as the "Church"). The Church is in East Legon, Accra. **A1**, **A2** and I are members of the Church. I am also a Treasurer at the Church. I first met **A1** at the Church on his 30th birthday. That was about bout 14 years ago. Rev. Wengam, the Head Pastor of the Church, introduced **A1** to me. At the time, Rev. Wengam wanted me to assist **A1** to pay his thanksgiving offering to the Church. At the time, I didn't know the work that **A1** did.

3. Subsequently, **A1** and I became friends. I later introduced banking products from my bank, UMB, to him and consequently convinced him to open accounts with the bank. **A1** opened a personal bank account for himself. He also opened a corporate account for his company – **A4**. This was sometime in the year 2010. At the time of opening the account (for **A4**), **A4** could not meet the minimum requirement for two directors. **A4** had only one director, as the other director on

A4's record was deceased. To satisfy the minimum directorship requirement **for A4**, **A1** requested that I become the second director, which I consented to. I put my name down as the second director. That is how I became a director of **A4**.

4. In **July 2018**, I resigned from UMB after I was transferred from the Legon branch to the Tema branch. I have a copy of the transfer letter with me. It is dated **November 13, 2017**. I wish to tender it in evidence (**INDEX V**). I resigned because I had been experiencing health issues including severe migraines. So, my husband and I decided that I resign since the bank was not willing to post me to a location closer to Oyarifa. Upon resignation, I informed **A1** that I was no longer working with UMB. I told him I needed a new job. **A1** agreed to assist by involving me in the operations of **A4**. I combined the duties which **A1** assigned to me at **A4** with my treasurer duties in the Church.

5. However, I never received a letter of employment or appointment at **A4**. Therefore, I was not given specific duties nor formal terms of employment. I only acted on *ad hoc* instructions from **A1** and **A2**. However, I was paid a monthly stipend. For instance, I was paid Three Thousand One Hundred and Thirty-Seven Ghana cedis (**GHC 3,137**) up to January 2021. I have copies of some of my pay slips with me. I wish to tender them in evidence (**INDEX W Series**). I received stipend payments until the commencement of investigations in this case this year. Most of my work was done remotely from home, and I sparingly visited **A4**'s offices. On average, I visited the office once every three weeks.

6. Along the line in 2018, **A1** and **A2** introduced me to another company – B.N.C Communications Bureau Limited. A1 called me on the phone that we should open a new company. The company registration documents were brought to me at home to sign. A1 also said we needed to open a new bank account for the company. He instructed me to get the account opening done. **A1** did not discuss with me or made me aware of the operations of B.N.C Communications Bureau Limited. The only tasks I undertook in the name of the company was to make payments and withdrawals as instructed by **A1** or **A2**.

7. As I mentioned, **A1** and **A2**, from time to time, instructed me to carry out tasks on their behalf in respect of **A4**. For example, they had, on occasion, instructed me to facilitate the payment of cheques signed by **A1** and **A2** to third parties. These bank instructions were usually sent to me directly through email. On other occasions, **A1** sent such emails directly to the bank and put me in copy. I have copies of such emails. I wish to tender them in evidence (**INDEX X SERIES**). Additionally, **A1** sometimes instructed me to make cheque withdrawals from **A4**'s accounts with UMB and, sometimes, also from the accounts of BNC Communications Bureau Limited. When I withdrew such cheques, I delivered the

monies to either **A1** or **A2**. Sometimes, too, I transfer the monies to MADAM MARGARET ABA DONKOR at her request. MADAM MARGARET ABA DONKOR is **A1**'s mother. I have a screenshot of one of such requests to transfer monies to MADAM MARGARET ABA DONKOR. I wish to tender it in evidence (**INDEX Y**). I also sent the monies I withdrew from the bank directly to other persons. In this respect, I have a record of the monies that I have delivered to the third parties. I updated this list till sometime in 2021. It is hand-written notes of people to whom **A1** instructed me to deliver the withdrawn monies to. I wish to tender them in evidence (**INDEX Z Series**).

8. I kept the **A4**'s cheque books. **A1** gave the cheque books to me to keep. The cheque leaves were pre-signed by **A1** and **A2**. I have some of the pre-signed cheque books with me. I wish to tender them in evidence and make them available for inspection (**INDEX AA**). **A1** and **A2** are signatories to **A4**'s bank accounts and, also, the bank account of BNC Communications Bureau Limited at UMB. I do not recall personally signing any of the cheques. I am not a signatory to the bank account. **A1** or **A2** also often instructed me to make cheque payments to named individuals or companies. In such cases, I filled in the pre-signed but blank cheques with the amounts which **A1** or **A2** dictated to me. The amounts of money I withdrew from these bank accounts varied between Two Thousand Ghana cedis (**GHC 2,000.00**) to One Million Ghana cedis (**GHC 1,000,000.00**). I am a third-party to the bank account. Nonetheless, I am allowed to personally draw on the account by sending an email to the bank and copying **A1** or **A2**. This was allowed because **A1** had lodged an indemnity letter with the bank to that effect. I have a copy of such indemnity letter. I wish to tender it in evidence (**INDEX BB**). Sometimes, I go to the bank to personally make the withdrawals and deliver them directly to **A1** or **A2.** Other times, too, I send FRANK ANANE DEKPEY to, either deliver the money I have withdrawn, or to, by himself, make the withdrawals from the bank. FRANK ANANE DEKPEY is **A1**'s driver. He is also an employee of Vertex Solutions Limited – another company which I know **A1** and **A2** own.

9. Throughout my work with **A1** and **A2**, I took no major decisions – whether financial, operations or strategic – on my own. I followed the decisions and instructions of **A1** or **A2**. Throughout my works with **A4**, I was never invited to, neither did I ever attend a board of directors' meeting. I was never a signatory to any bank account – whether for **A4** or for BNC Communications Bureau Limited. I was, however, a signatory to the Consolidated Bank Ghana account of **A4**. The account number for that account is **0512-3110-59961**. To the best of my knowledge, from around 2019, that account was used for salary payments. **A1** did not make me aware of the purpose of most of the withdrawals he made from the Advantage Solutions bank account.

10. After opening the bank account for BNC Communications Limited, the bank did not issue cheque books on the account immediately. While waiting for the cheque books, we withdrew money by, first, transferring the amount from the BNC Communications Limited account to **A4**'s account; and, then, using **A4**'s cheques to effect the withdrawal. These transfers were done by letters attached to emails, authored by either **A1** or me upon **A1**'s instructions – requesting the transfer of the monies from the BNC bank account to the Advantage Solutions Account. So, monies from BNC Communications Limited were withdrawn via **A4**'s bank account.

11. The investigators have told me that **A1** and **A2** have built and own many houses. They also told me that **A1** and **A2** deal in real estate. I am aware that **A1** and **A2** are engaged in a building project which is the Dorchester apartment in Kumasi. I am aware of this building project because **A1** instructed me on many occasions to withdraw money from the bank which I was instructed to send to **A1**'s mother, MADAM MARGARET ABA DONKOR, to pay vendors and staff on that project. **A1** and her mother often referred to the project as the "Kumasi Project". I have withdrawn and sent monies from the bank accounts of **A4** and BNC Communications Bureau Limited for the purposes of the Kumasi Project.

12. The investigators have told me that **A1** and **A2** own, have interests in or control other companies. I do not know much about the operations of other companies. This is because I was never involved in their activities. **A2** managed most businesses all by herself. I only received company registration documents to sign to become a director when new companies are incorporated. **A1** and **A2** gave me no further information on the companies. I have never attended a directors' meeting for any of the companies.

13. Apart from being a director on **A4**'s board, I am also a director on the boards of some companies which I believe belong to **A1** and **A2**. The companies include VERTEX SOLUTIONS LIMITED, VERTEX PROPERTIES LIMITED, ENTERPRISE DREAM COLLECTIONS LIMITED, FOOD PLAN LIMITED, KREAM AUTO COLLECTIONS LIMITED, SECURIGENCE LIMITED, and URBAN KID LIMITED.

14. Again, I am aware the **A1** sent huge sums of monies from the bank account of BNC Communications Bureau Limited to some friends and business. One of such friends or business interest is RASHIDA SAANI. RASHIDA SAANI is the proprietor of ALHAJI'S WIFE WAAKYE food line and the owner and CEO of I-ZAR LIMITED. Particualrly, I am aware that **A1**, on **April 29, 2020**, caused an amount of Two Million, Five Hundred thousand Ghana cedis only (**GHC 2,500,000.00**) to be transferred from the account of BNC Communications Bureau Limited to I-ZAR

LIMITED. I have a copy of the transfer instruction with me. I wish to tender it in evidence (**INDEX CC**).

....
MILDRED DONKOR

STATEMENT OF TRUTH

I, MILDRED DONKOR, verify that the statements contained in this witness statement are true to the best of my knowledge and belief.

....
MILDRED DONKOR

DATED AT THE OFFICE OF THE ATTORNEY-GENERAL, THE LAW HOUSE, LIBERIA ROAD, ACCRA, THIS 15TH DAY OF OCTOBER 2025.

TO:
THE REGISTRAR
HIGH COURT (GENERAL JURISDICTION)
ACCRA

AND TO THE ABOVE-NAMED ACCUSED PERSONS OR THEIR LAWYERS