

AMENDED CHARGE SHEET

IN THE GREATER ACCRA CIRCUIT COURT, ACCRA CIRCUIT COURT, ACCRA

SIU/CID/HQRS CASE

R.O. NO: 182 /2023

C-6-1
20/2/2023
D4/155/2023
COURT CASE NO.....

THE REPUBLIC

VRS.

- 1. PATIENCE BOTWE**
- 2. SARAH AGYEI**
- 3. BENJAMIN SOWAH**
- 4. KWAKU BOTWE**
- 5. MALIK DAUDA**

COUNT ONE

STATEMENT OF OFFENCE

CONSPIRACY TO COMMIT CRIME TO WIT: STEALING: CONTRARY TO SECTIONS 23(1) AND 124 (1) OF THE CRIMINAL OFFENCES ACT OF 1960, ACT 29

PARTICULARS OF OFFENCE

PATIENCE BOTWE: Age: 18 Yrs, Hairdresser 2. SARAH AGYEI Age:30 Years, Unemployed: Between the period of a July and October 2022 at Abelemkpe in the Greater Accra Region and within the jurisdiction of this court did agree or acted together with common purpose to commit crime to wit: Stealing.

COUNT TWO

STATEMENT OF OFFENCE

STEALING: CONTRARY TO SECTION 124 (1) OF THE CRIMINAL OFFENCES ACT OF 1960, ACT 29

PARTICULARS OF OFFENCE

PATIENCE BOTWE: (Age: 18 Yrs, Hairdresser): 2. SARAH AGYEI Age:30 Years, Unemployed Between the period of July and October 2022 at Abelemkpe in the Greater Accra Region and within the jurisdiction of this court, did dishonestly appropriate cash the sum of One Million Dollars (\$1,000,000 USD) the property of Cecilia Abena Dapaah.

COUNT THREE
STATEMENT OF OFFENCE

**STEALING: CONTRARY TO SECTION 124 (1) OF THE CRIMINAL OFFENCES
ACT OF 1960, ACT 29**

PARTICULARS OF OFFENCE

PATIENCE BOTWE: (Age: 18 Yrs, Hairdresser), 2. SARAH AGYEI Age:30 Years,
Unemployed Between the period of July and October 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 (€300,000,000) the property of
Cecilia Abena Dapaah.

COUNT FOUR
STATEMENT OF OFFENCE

**STEALING: CONTRARY TO SECTION 124 (1) OF THE CRIMINAL OFFENCES
ACT OF 1960, ACT 29**

PARTICULARS OF OFFENCE

PATIENCE BOTWE: (Age: 18 Yrs, Hairdresser): 2. SARAH AGYEI Age:30 Years,
Unemployed: Between the period of July and October 2022 at Abelemkpe in the Greater
Accra Region and within the jurisdiction of this court, did dishonestly appropriate
cash the sum of Three Hundred and Fifty Thousand Ghana Cedis (GH¢ 350,000,000)
the property of Cecilia Abena Dapaah.

COUNT FIVE
STATEMENT OF OFFENCE

**STEALING: CONTRARY TO SECTION 124 (1) OF THE CRIMINAL OFFENCES
ACT OF 1960, ACT 29/60**

PARTICULARS OF OFFENCE

PATIENCE BOTWE Age: 18 Yrs, Hairdresser: 2. SARAH AGYEI Age:30 Years,
Unemployed Between the period of July and October 2022 at Abelemkpe, in the Greater
Accra Region and within the jurisdiction of this court, did dishonestly appropriate
assorted clothes valued Ninety-Five Thousand Ghana Cedis (GH¢95,000.00),
assorted handbags valued Thirty-Five Thousand Dollars (\$35,000.00 USD) and

assorted perfumes valued One Thousand Four Hundred Dollars (\$1,400.00 USD) the property of Cecilia Abena Dapaah.

COUNT SIX
STATEMENT OF OFFENCE

**STEALING: CONTRARY TO SECTION 124 (1) OF THE CRIMINAL OFFENCES
ACT OF 1960, ACT 29**

PARTICULARS OF OFFENCE

PATIENCE BOTWE Age: 18 Yrs, Hairdresser: 2. SARAH AGYEI Age:30 Years, Unemployed Between the period of July and October 2022 at Abelemkpe, in the Greater Accra Region and within the jurisdiction of this court, did dishonestly appropriate assorted Jewelries valued at Ninety-five Thousand Dollars (\$95,000.00) the property of Cecilia Abena Dapaah.

COUNT SEVEN
STATEMENT OF OFFENCE

**STEALING: CONTRARY TO SECTION 124 (1) OF THE CRIMINAL OFFENCES
ACT OF 1960, ACT 29**

PARTICULARS OF OFFENCE

PATIENCE BOTWE Age: 18 Yrs, Hairdresser: Between the period of July and October 2022 at Abelemkpe, in the Greater Accra Region and within the jurisdiction of this court, did dishonestly appropriate six (6) pieces of assorted kente clothes valued at Ninety Thousand Ghana Cedis (GH¢90,000.00) and six (6) sets of men suit valued at Three Thousand Dollars (\$3,000.00USD) the property of Daniel Osei Kuffour.

COUNT EIGHT
STATEMENT OF OFFENCE

**DISHONESTLY RECEIVING: CONTRARY TO SECTION 146 OF THE CRIMINAL
OFFENCES ACT OF 1960, ACT 29**

PARTICULARS OF OFFENCE

BENJAMIN SOWAH Age: 29 Yrs, Plumber: For that you during the year 2023 at Accra in the Greater Accra Region and within the jurisdiction of this court, you dishonestly received One Hundred and Eighty Thousand Ghana Cedis

(GH¢180,000.00) the property of Cecilia Abena Dapaah, which you knew have been obtained by means of crime to wit stealing.

COUNT NINE
STATEMENT OF OFFENCE

**DISHONESTLY RECEIVING: CONTRARY TO SECTION 146 OF THE CRIMINAL
OFFENCES ACT OF 1960, ACT 29**

PARTICULARS OF OFFENCE

KWAKU BOTWE Age: 65 Yrs, Trader: During the year 2023 at Accra in the Greater Accra Region and within the jurisdiction of this court, you dishonestly received Fifty Thousand Ghana Cedis (GH¢50,000.00) the property of Cecilia Abena Dapaah, which you knew have been obtained by means of crime to wit stealing.

COUNT TEN
STATEMENT OF OFFENCE

**DISHONESTLY RECEIVING: CONTRARY TO SECTION 146 OF THE CRIMINAL
OFFENCES ACT OF 1960, ACT 29**

PARTICULARS OF OFFENCE

MALIK DAUDA Age: 34 Unemployed: During the year 2022 at Accra in the Greater Accra Region and within the jurisdiction of this court, you dishonestly received One Hundred Thousand Ghana Cedis (GH¢100,000.00) the property of Cecilia Abena Dapaah, which you knew have been obtained by means of crime to wit stealing.

DATED AT CID HEADQUARTERS, ACCRA THIS 20TH DAY OF JULY, 2023.


EMMANUEL NYAMEKYE

**THE REGISTRAR
CIRCUIT COURT,
ACCRA**

NO. 48537 D/CPL. RICHARD ADDAI I/C CASE

BRIEF FACTS: - Complainants in this case are Daniel Osei Kuffour 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 a former house help to the complainants. Third accused (A3) Benjamin Sowah is a boyfriend to A1. Fourth accused (A4) Kwaku Botwe is A1's father. Fifth accused (A5) Malik Dauda is A1's former boyfriend. Sometime in June 2023, the complainants reported a theft of cash and some personal effects as indicated on the face of the charge sheet. Prior to that A1 who was a house help to the complainants was caught to have opened and entered the bedroom of the complainants with a duplicate key. Upon intelligence, A1 and A3 were arrested at their hide out in Tamale in the Northern Region. A search conducted in their room revealed \$40,000 USD and GH¢72,619.70. Police investigation revealed that, sometime in October 2022, complainant Daniel Osei Kuffour 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 the door therein. Subsequently, the complainants detected theft of properties indicated on the face of the charge sheet. Further investigations revealed that A1 used part of the stolen money to buy a three-bedroom house at Amrahia at a cost of Seventy Thousand Dollars (\$70,000) UDS. 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. A1 and A3 also indicated that they 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 at Tamale 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 store room at Tamale at a total cost of One Hundred Twenty Thousand Ghana Cedis (120,000.00). A1 admitted the offence and 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-contained house at Budumburam. A1 also gave Fifty Thousand Ghana Cedis (GH¢50,000.00) 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 A5 who also admitted same. Case is still under investigation.



INVESTIGATOR