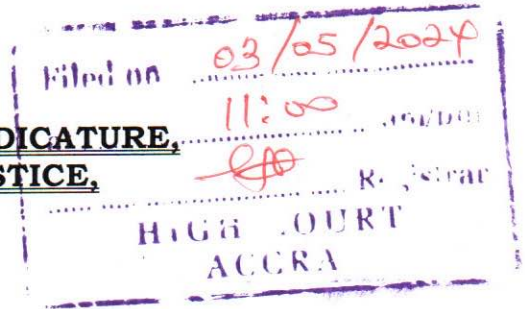


IN THE SUPERIOR COURT OF JUDICATURE,
IN THE HIGH COURT OF JUSTICE,
ACCRA - A.D. 2024.



CASE NO: CR/0045/2023.

THE REPUBLIC

VRS

MICHAEL NYINAKU

WITNESS STATEMENT OF OKBELL MAJDOUB

I. PRELIMINARY.

A. Introduction, Background & Work Experience

1. My name is Okbell Majdoub. I reside at GPS GE-0655584 at Abla Adjei at Old Ashongman, Accra in the Greater Accra Region of the Republic of Ghana.
2. I am currently an entrepreneur engaged in the setup of businesses for profit. Prior to my entrepreneurship career, I was a banker. My banking experience started with Fidelity Bank in 2006. At Fidelity Bank, I was head of Quality Assurance till I left the bank.
3. I joined BEIGE in 2016 as the head of Service Quality. When I joined Beige, it had a lot of subsidiaries in the financial services industry therefore my role was to oversee service quality assurance across all the financial service subsidiaries of The BEIGE Group [TBG]. In the hierarchy of the organization, I reported to the CEO of TBG.
4. The key responsibility of the Service Quality department was to ensure consistency in the service flow across the sub-units. This required training, brand standardization [look and feel] and service measures.

5. My appointment with TBG came to an abrupt end following the receivership of the bank.

B. My Witness Statement

6. In March 2024, the accused contacted me to ask if I could testify to the proceedings pending before this court. The accused asked if I could testify to matters concerning the activities I performed with TBG and its relationship with the Beige Bank [the bank].

7. The accused also informed me that the court needed to understand the role of TBG in the evolution of the bank from a savings and loans to a universal bank and the activities undertaken by TBG in that respect. I agreed to the accused's appeal and he entreated that I meet with his lawyer who will explain the nature of the proceedings to me.

8. I met with the accused person's lawyer, Mr. Thaddeus Sory. I confirm that all the statements in my present witness statement result from my conversations with Mr. Sory who asked me questions concerning my work with TBG, the role that the Service Quality [SQ] team played in these activities and expenditures done by TBG if (any) for the bank, the relationship it had with the bank as well as my involvement with the receiver (if any), and TBG's operations after the bank's receivership.

9. Mr. Sory also referred me to documents that he said were tendered in evidence by other witnesses and my present witness statement reflects the answers I gave to Mr. Sory during our interactions on the various questions he asked me.

II. BCSL to TBB

C. Transition from Savings and Loans to a universal bank

10. As part of preparations towards the transition of BCSL into universal banking the bank undertook a lot of branch expansion projects all over the country.

11. These projects involved the refurbishments of all the **previously existing branches** to reflect the institution's newly acquired status and the construction of **completely new offices**.

D. The nature of the works that took place

12. The execution of the bank's projects involved the collaboration of a lot of departments. I recall that it involved particularly the **projects, brands, service quality** and **procurement** departments. The procurement department was also known as the Central Business Support department [CBS]. During the expansion process of the bank, Babel Limited [BBL] a subsidiary of TBG was the main entity that built offices for the bank. The IT, banking operations and admin departments of the bank were also involved in these activities.
13. Every department involved in the process had specific responsibilities and these were delineated as follows:
 - a. **The Projects team** coordinated and supervised the physical construction works executed by the contractors. I recall again that the main contractor for these projects was Babel Ltd. The first stage of the project involved constructing the building, which had to be completed before proceeding with branding and set-up works. The building construction works consisted of various aspects such as architectural design, physical property, vaults, security, electrical and electronic installations, lighting, painting, compound landscaping and all other necessary installations required to complete the building. Moreover, I remember that the projects team was headed by an officer named Freddie Wuddah.
 - b. **The CBS team** was responsible for procuring and providing furniture, computers, generators and other miscellaneous equipment that were required for use in the office. The CBS team was led by an officer named Anthony Owusu Ansah and the CBS was a unit within BBS Logistics, a subsidiary of TBG.
 - c. **The Service Quality team** [SQ] was responsible for setting up the office. This task involved coming up with the architectural impression of what the interior of the office should look like, placing and positioning all the items provided by CBS [furniture, waste bins, writing pads, computers, etc] in their exact positions where they should be in the offices – in conformity with the design. Besides the items that were usually received from CBS [which have already been listed above], SQ was responsible for procuring décor items such as **flower vases, books, bookshelves** and **specialised décor items** that would be placed at the branch to give each branch the look and feel that had been conceived for that branch. As mentioned already, I was the leader of the SQ team.

- d. **The Brands team** was responsible for installing external and internal signage, branding of ATMs, and installation of all material that communicated the name of the brand, vision and mission, motivational messages and staff watchwords, etc. Brands were also responsible for the provision of all branded merchandise that would be used by the branch, the installation of all directional signs that led customers to the location of the branch as well as all tasks relating to advertising. The brands team was led by Michael Djanie.
- e. **The IT & banking operations teams** of the bank would then come in to install software on all the computers and other electronic installations that had been placed at the branch and check to ensure that the vaults especially were secure in accordance with the standards expected by the branch as well as ensure that all security installations were proper and ready for use, etc.

14. The sequence in which the works happened was as follows:

- a. the design and construction of the property itself [by Babbel Ltd],
- b. the supply of furniture and office installations including power generators [by BBS/CBS],
- c. the actual setting up of the office [by SQ department],
- d. the installation of branded and communication material [by brands department],
- e. the cleaning of the office [by SQ team]
- f. the installation of software and set-up of computers [by the office bank's IT staff],
- g. the installation of final décor items [by SQ team]
- h. the final cleaning of the space and [by SQ team]
- i. the handing over of the office to TBB.

15. Once every department has performed their task and the branch is deemed ready to be handed over to the bank, the bank is informed and the bank takes the branch from there to commence operations in it. Consequently, we then moved on to the next branch to prepare the same for the bank. We performed these tasks routinely and repetitively for so many branches around the country. I recall

that on a lot of occasions, the CEO himself as well as other officials of the bank conducted spot checks to inspect our work and provide feedback.

16. For each office that we worked on, there were standard architectural designs and layouts that served as a guide on how the office should be set up. We had also developed a **standard look and feel concept** [or décor theme] for every branch and that is what we all worked to achieve. Key ingredients of this décor theme were the use of particular colours for guest lounges, particular colours of sofas, a mini library [bookshelves with books arranged in them] and a unique feature that we described as a **"kokonsa window"** or a splash window. The intent behind this design concept was to make the branch look uniquely attractive and to keep the branch in the minds of all passers-by.

17. I can confirm that as of today, these *kokonsa windows* still exist at these locations which have now become branches of CBG. I am particularly referring to CBG branches located at Spintex, Atomic and Weija. To confirm the statement I have just made, I have attached to my present statement, images of the *kokonsa windows* for the Spintex, Atomic Junction and Weija branches of CBG. They have been marked as **exhibits OM-1, OM-1A, and OM-1B**. I have also attached the *kokonsa window* we did for the Airport West branch to my statement and it is marked as **exhibit OM-1C**.

18. The level of detail and decoration that went into each branch varied depending on their size. Smaller branches had limited space, so their decor was minimal. On the other hand, larger branches had more space to work with, resulting in more extensive decor. Some examples of larger branches included Labone, Airport West, Atomic Junction, Tesano, Osu, Weija, Tamale, and Adum (in Kumasi). These branches were premium branches and they received extensive décor. My attention has been drawn to documents **marked 76 and 77** which are images of the Airport West and Atomic Junction that have already been tendered in evidence. I am familiar with these branches because as I already stated, I led the team that was responsible for setting them up these branches.

E. How the projects were funded

19. The SQ team was a department that operated under TBG. As a result, our funding came from the finance office of TBG. Within the hierarchy of the TBG office, I reported directly to the CEO. Whenever my department required funds, I would submit a request to the office of the CEO. Upon approval, I would then present it to the finance office, which would process it as instructed by the CEO.

20. I must add also that there were several occasions where I had to take advances directly from the CEO's office because it took a bit of time for the finance department to process checks and there were occasions where the items we needed to procure were such fast moving items that if you wasted time, they would be gone by the time the check was ready. Besides, some of these vendors were way-side vendors who would not accept checks anyway.
21. At SQ, we accounted for the funds that came to us using expenditure reports. Once a request made by us was approved [by the CEO], we sent the request showing the evidence of its approval to the finance department. The finance department then generated pay vouchers which were the standard documents they used to process the disbursement of the funds to us or a designated vendor so that the activity could take place. Therefore, at SQ, when we complete an activity, the manner in which we account for or show evidence of work done is through **an expenditure report** [which usually is a memo or email] to which would be attached schedules of the activities and possibly images concerning the activity or confirming its execution. Another form through which we do this is by way of a form that we called '**Customer Acceptance/Work Completion Form**' which would be signed by us and filed in our office.
22. Thus, whether it is a work completion form or an expenditure report, it was most likely to have attached to it other documents such as a service order, invoices received from vendors or contractors, emails or memos confirming the requisitions we made for the activities and the approvals received amongst others. A copy of the work completion form or expenditure report which would have all the documents just referred to above attached to it, would also be sent to finance for them to add to their vouchers. Pay vouchers were kept by the finance department and not by the SQ department. We also made it a policy that all vendors that we dealt with were automatically caused to open accounts with the bank so their payments would be credited to their accounts. By this action, they became automatic customers of the bank.
23. In putting together expenditure reports in respect of works done by my department, we usually attached images to them. The reason for which we did this was to provide further physical evidence of the activities we had undertaken and in respect of which we were submitting the expenditure reports. That way, when the audit team reviewed our activities, they were able to relate our reports to actual evidence on the ground. It was also the practice of management to request pictorial evidence of works done by us as they could not be everywhere to conduct a physical verification by themselves.
24. As evidence of the statement I have just made above, I have attached a document **marked OM-2**. This is a set of documents that confirm that bookshelves had

been installed at the then-upcoming Labone branch of the bank in the course of setting up that branch. The document includes:

- a. A customer Acceptance/Work completion form. This form was dated May 8th 2018 and had been signed by Esther Charway, one of my subordinates and approved by myself. It signified that we had inspected and were satisfied with the work done by the contractor with respect to the bookshelves for the Labone branch.
- b. Attached to this form is a form labelled "Service Order". This form was dated April 25th 2018. It was signed by Esther Charway, myself and several other officers. The essence of this form was to register the contract as a service due for payment in the future when executed.
- c. It also included a document labelled "procurement requisition voucher" dated April 25th 2018. It was signed by Esther Charway and myself, approved by one Augustine Boakye and authorised by the CEO.
- d. There were several invoices attached to this document.
- e. It also had a memo from me to the CEO dated April 23rd 2018. In that memo, I was requesting his approval to undertake interior fit-out works for the Labone branch which was one of the branches we were working on at the time.
- f. My memo requested a budget of GHS130,972 however the CEO approved an amount of GHS128,000. He further stated in his approval that "*deliver within 4 weeks*".
- g. Attached to this voucher are the pictures of the shelves as had been installed and I must add for emphasis that the work completion form was signed on May 8th 2018 after the work had been done and images taken.

25. I recall that at SQ when we finished setting up a branch, we generated an inventory report on books in the mini library. This was because we were very particular about the security of books in the mini-libraries. For each of these inventory reports, we got officials of the branch to confirm the inventory by signing the report. I have attached and marked **OM 3, OM3-A, OM3-B, OM3-C, OM3-D, OM3-E, OM3-F** and **OM3-G**, copies of such library inventory reports

generated for **Adenta Main, Atomic Roundabout, Tesano, Abeka Lapaz, Mallam Junction, Madina Zongo Junction, Kwabenya** and **Nima No. 2** branches respectively after they had been set up and handed over to the branch. The court will note that these inventory reports have all been signed by officials of the branch, as was the practice.

26. Sometime in June 2018, the CEO requested that we provide him with an expenditure report on all the work we had done in respect of the re-modelling projects done for the bank. In putting together this report we had to engage the finance department because as I have stated earlier, it was the finance department that kept payment vouchers. Besides, this exercise comprised a multitude of little projects and tasks that had been going on for almost 2 years and we needed the finance team to assist us with this data.

27. We also had to engage officials of the CEO's secretariat because in the course of our work, there were occasions where we took advances from their department as well. From the CEO's secretariat, we obtained copies of all the vouchers supporting the advances obtained from them. The finance team then assisted us by putting together all these costs and also allocating them amongst the branches that we worked on and after that, we added the library inventory records.

28. In compiling this expenditure report, it was practically impossible to provide an inventory of every item. For example, we would not know how to itemize plastering work done by a mason on a cracked wall or brick tiling work done on walls with dampened surfaces. What we could state was the cost of it but one could not add it to any inventory. Besides, the wall would have already been plastered and painted and therefore it would be difficult to show the extent of the crack before it was fixed. The same could be said for sanitary ware that was replaced, washrooms that were re-tiled and banking halls that were re-tiled, amongst others. There were also so many little pieces of décor items and civil works that it was just practically impossible to put together an inventory for all of them. Therefore, what we did was to support the expenditure report with as many images as evidence of the work done. We also added to this report, the original budget that had been submitted to and approved by the CEO before the commencement of these projects.

III. EXPENDITURE REPORT

F. Exhibit 66B

29. I am told that the expenditure report we submitted to the CEO in respect of the office set-up work we did is part of documents already tendered in evidence and marked **Exhibit 66B**. I am familiar with this document because it originated from my department. Exhibit 66B is made up of over 180 pages and I would proceed to explain this document to the court as follows;

- a. **On page 1 of Exhibit 66B** is the memo in which we communicated to the CEO the total cost incurred on the **remodelling of existing BCSL offices**. This memo was dated June 15th 2018. Remodelling of existing BCSL offices included **civil works, interior fit-out works and branding works**.
- b. Civil works are purely brick-and-mortar works or what is commonly described as masonry works. Interior fit-out works are essentially decorative works to enhance the appearance of the branch. They include specially designed ceilings, specially designed teller cubicles, flooring works, etc. Branding works are information communicational material that are affixed and displayed to advertise the brand and its various products as well as messages to motivate staff.
- c. **On pages 2 and 3 of Exhibit 66B** is a schedule listing all the branches where refurbishment and rebranding works took place. These branches were **71 in number**. All these branches were **existing branches** of Beige Capital Savings & Loans [BCSL]. Most of them had been in existence for over 5 years. All of these 71 branches had to be re-branded before universal banking operations would commence in them. All of them needed minor civil engineering works to be done on them to give them an enhanced new look and make them suit the new status of the bank. Again, on page 2 of exhibit 66B, details had been **itemized** of what works would make up **branding works** and that would make up the **civil works**.
- d. **On pages 4, 5 and 6 of exhibit 66B**, the type of works that would be involved in the remodelling exercise had been described in a memo written to the CEO by the head of brands and team leader for projects of all TBG. This memo was dated November 12th 2016. To this memo was attached a budget for the 71 offices to be worked on. The entire project had been estimated to cost GHS30,568,000. In response to this memo, the CEO approved an amount of GHS28M. His exact words were *"Work with 28M"*.

The CEO further directed the CFO of TBG to *“facilitate the disbursement of these funds in piecemeal and to treat as priority at all times”*.

- e. **On pages 7 and 8 of exhibit 66B**, were the work plan or the project implementation timetable. The work plan spanned December 2016 to September 2017.
- f. **On pages 9 – 64 of exhibit 66B**, I attached the inventory reports of all books in the mini-libraries at the respective branches. Each report had the name of the specific branch on it.
- g. **On page 65 of exhibit 66B** is an image of the front of the Kwabenya branch. I am familiar with this branch because of the frontage look. The essence of this image is to report on the following to the CEO;
 - i. The exterior of the branch has been re-painted to reflect the new colours [beige, red and white].
 - ii. The front signage bearing the new name “The BEIGE Bank” has been installed.
 - iii. Remittance product labels have been installed on the front arch of the entrance.
 - iv. The ATM machine has been installed.
 - v. The ATM booth has been branded.
- h. **On page 66 of Exhibit 66B** is an image of a teller counter in a particular branch. The essence of this image is to report on the following to the CEO;
 - i. The teller counter had been re-cladded but not branded.
 - ii. The backdrop logo of “The BEIGE Bank” has been fixed behind the teller counter. This was a standard feature in the interior look and feel of every branch.
 - iii. The BCE’s office has been wrapped and branded for privacy and security purposes.
 - iv. The remittance product display for Vodafone cash had been placed on the teller counter. We were informed that the bank had a financial services distribution partnership with Vodafone which required that this feature be prominently displayed at the teller counters together with feedback boxes.

- i. **On page 68 of Exhibit 66B** is an image of a teller counter in a particular branch. The essence of this image is to report on the following to the CEO;
 - i. The teller counter has been re-cladded but not branded.
 - ii. The backdrop logo of "The BEIGE Bank" has been fixed behind the teller counter. This was a standard feature in the interior look and feel of every branch.
 - iii. The logo of "The BEIGE Bank" has been pasted on the teller counter.
 - v. The remittance product display for Vodafone cash had been placed on the teller counter together with feedback boxes.

- j. **On pages 70, 72-78 of Exhibit 66B** are images of works happening at the Osu branch of the bank. The essence of these images was to report on the following to the CEO with respect to the progress of work at that branch;
 - i. Page 72 shows the installation of "staff watch words" at the branch.
 - ii. Pages 73 and 74 show the cladding of the teller cubicle and the customer writing counters.
 - iii. Pages 75, shows back office workstations installed.
 - iv. Page 76 shows banking hall customer waiting chairs positioned, wood-cladding of the pillar in front of the teller cubicle.
 - v. Page 77 shows the guest lounge being set-up but not completed at all.
 - vi. Page 78 shows the frontage of the branch. The image shows that the painting has been done as specified, stone cladding works done, blinds installed, front signage installed, remittance product labels installed on the front arch, ATM installed and ATM booth branded.

- k. **On page 82 of Exhibit 66B** is an image of the front of the **Spintex branch**. I am familiar with this branch because of the frontage look. The essence of this image is to report on the following to the CEO with respect to the progress of work at the branch;

- i. The exterior of the branch has been re-painted to reflect the new colours [beige, red and white].
- ii. The front signage bearing the new name "The BEIGE Bank" has been installed.
- iii. Remittance product labels have been installed on the front arch of the entrance.
- iv. The ATM machine has been installed.
- v. *Kokonsa* lounge had been set-up.
- vi. Grass bed planted.

1. **On page 84 of Exhibit 66B** is an image of the frontage of the **Weija branch**. I am familiar with this branch because of the frontage look. The essence of this image is to report on the following to the CEO with respect to the progress of work at the branch;

- i. The exterior of the branch has been re-painted to reflect the new colours [beige, red and white].
- ii. The front signage bearing the new name "The BEIGE Bank" has been installed.
- iii. Remittance product labels have been installed on the front arch of the entrance.
- iv. The ATM machine has been installed.
- v. ATM booth has been re-branded.
- vi. *Kokonsa* lounge had been set-up.
- vii. Stone cladding works done.
- viii. Grass bed planted.
- ix. Installation of blinds for top floor pending.

m. **On page 85 of Exhibit 66B** is an image of a section of the banking hall of the Weija branch. The image seeks to convey the following information;

- i. The teller cubicles have been clad.

- ii. TBB logos have been fixed on the teller cubicle and behind the tellers.
 - iii. Fire extinguishers have been fixed in the banking hall.
 - iv. BCE's office has been wrapped
- n. **On pages 86 – 97 of Exhibit 66B** are images confirming the same types of work done for other branches as have already been discussed above.
- o. **On page 101 of Exhibit 66B** is an image of the frontage of the **Tamale Branch**. I am familiar with this branch because of the frontage look. The essence of this image is to report on the following to the CEO;
 - i. The exterior of the branch has been re-painted to reflect the new colours [beige, red and white].
 - ii. The front signage bearing the new name "The BEIGE Bank" has been installed.
 - iii. Remittance product labels have been installed on the front arch of the entrance.
 - iv. The ATM machine has been installed.
 - v. ATM booth has been re-branded.
 - vi. Blinds have been installed for all windows.
 - vii. Stone cladding works done.
- p. **On pages 107, 108, 109 and 110 of Exhibit 66B** show images of furniture items being delivered for set-up works at branches.
- q. **On page 131 of Exhibit 66B** is an image of a mini-library set up at a branch.
- r. **On pages 133, 136-141, 181-182 of Exhibit 66B** are images showing internal fit-out works ongoing at the Airport West branch of the bank. Images of these works as were completed I am told have already been tendered in evidence and marked exhibit **77**.
- s. **On pages 142 – 145 of Exhibit 66B** are images of internal fit-out works ongoing at the Atomic Junction branch of the bank. A careful reading of

page 143 will reveal the dropped and curved ceiling, the sports lights, the white teller counters and partitioned floors. Pages 144 and 145 show the guest lounge viewed from different positions. I recall that most of the works – including key civil works - that were done at the Atomic branch got destroyed as a result of a fire explosion that occurred at a gas station situated opposite the branch. Thus we had to re-do all that again with more re-enforcements.

- t. **On page 180 of Exhibit 66B** is an image of the Adenta main office of the bank after it had been painted to reflect the new colours of the bank. I am told by Mr. Sory that Mr. David Sogbordjor made mention of the re-painting of this branch in his witness statement. As with all branches that existed prior to the transition into universal banking, this branch was originally painted in red and white. Attached and marked **OM 3-H** is an image of this branch prior to it being rebranded.

30. As further evidence concerning these projects, I have provided and attached to my present statement, different categories of evidence that are arranged in this order;

- a. Evidence confirming procurements made in the course of executing these projects.
- b. Evidence of items procured actually being delivered to offices of BEIGE.
- c. Evidence of items being distributed by officers of TBG to various branches being set up for the bank.
- d. Evidence of set-up work actually happening.

IV. PAYMENT VOUCHERS

G. Items and Services procured using funds secured from the Finance department of TBG.

31. In this section of my statement, I will provide **samples of payment vouchers** which provide evidence of payments made for works done and supervised by the SQ department. As I stated earlier, the payments for activities usually came from the finance office of TBG. However, there were occasions when we had to obtain funds from the CEO's secretariat. The pay vouchers listed below were in respect of **payments made from the finance office of TBG**. These vouchers have been

marked as the **OM 4, OM 4-A, OM 4-B, OM 4-C, OM 4-D, OM 4-E, OM 4-F, OM 4-G and OM 4-H.**

Voucher Ref	Amount
OM 4	91,909.88
OM 4 - A	15,608.28
OM 4 - B	36,000.00
OM 4 - C	35,793.00
OM 4 - D	14,784.00
OM 4 - E	83,517.00
OM 4 - F	67,900.00
OM 4 - G	55,457.93
OM 4 - H	13,572.24

32. The payment voucher marked **OM 4** was a part-payment for the interior fit-out works done at the **Airport West branch** of the bank and details are as follows;

- a. This payment was dated February 22nd 2017 and made to a contractor named Belbedz Interiors. The payment was for an amount of GHS 91,909.88.
- b. As per a service order attached to this pay voucher, the contract sum was GHS194,848.94. This figure can also be found in a memo dated February 13th 2017 which was attached to the pay voucher. The exact details of the fit-out works involved have been detailed in this memo.
- c. A copy of the check issued to the contractor is also attached to this voucher.

33. Payment voucher marked **OM 4 - A** was a final payment for the interior fit-out works done at the **Atomic Junction branch** of the bank and details are as follows;

- a. This payment was dated March 20th 2017 and made to a contractor named Bellbedz Interiors. The payment was for an amount of GHS 15,608.28.
- b. As per a service order attached to the Pay voucher, the contract sum was GHS67,861.20. This figure can be found in a memo dated January 20th 2017 which was attached to the memo. The exact details of the fit-out works involved have been detailed in this memo.

- c. Copies of checks in respect of previous payments made to this contractor were also attached to this voucher.

34. Payment voucher marked **OM 4 - B** was a part payment for the interior fit-out works done at the **Osu branch** of the bank and details are as follows;

- a. This payment was dated May 8th 2017 and made to a contractor named Bellbedz Interiors. The payment was for an amount of GHS 36,000.
- b. As per a service order attached to the Pay voucher the contract sum was GHS60,000. This figure can also be found in a memo dated April 24th 2017 which was attached to the memo including architectural impressions of the concept. The exact details of the fit-out works involved have been detailed in this memo.

35. A comparison of the architectural impressions attached to exhibit OM 4-B with the images on pages 73, 74, 76 and 79 of exhibit 66B would reveal that the actual interior fit-out work done at the Osu branch was exactly the same as the impression attached to OM 4-B.

36. Payment voucher marked **OM 4 - C** was a final payment for the supply of neckties and lapel pins staff for staff of the bank and details are as follows;

- a. This payment was dated February 6th 2018 and made to a contractor named Rajova Ventures. The payment was for an amount of GHS 35,793.00
- b. As per a service order attached to the Pay voucher the contract sum was GHS123,000. This figure can also be found in a memo dated January 10th 2018 which was a sequel to an earlier memo approved by the CEO and dated September 12th 2017.
- c. Also attached to the voucher were a waybill and goods received note confirming the actual delivery of these merchandise by the contractor.
- d. A copy of the check issued to the contractor has also been attached to this voucher.

37. The Payment voucher marked **OM 4 - D** was payment for a specialized training program organized for frontline service staff of the bank's premium branches and details are as follows;

- a. This payment was dated March 23rd 2017 and made to a contractor named JPCANN Associates. The payment was for an amount of GHS 14,784.
- b. As per a service order attached to the Pay voucher the contract sum was GHS15,792. This figure can also be found in a memo dated March 13th 2017.
- c. Also attached to the voucher was an email detailing the staff selected to participate in this training program.

38. The Payment voucher marked **OM 4 - E** was part payment for the supply of neckties and lapel pins staff for staff of the bank and details are as follows;

- a. This payment was dated October 4th 2017 and made to a contractor named Rajova Ventures. The payment was for an amount of GHS 83,517.
- b. As per a service order attached to the Pay voucher the contract sum was GHS123,000. This figure can also be found in a memo dated January 10th 2018 [attached to OM 4-C] which was a sequel to an earlier memo approved by the CEO and dated September 12th 2017.
- c. Also attached to the voucher was an email detailing the staff selected to participate in this training program.
- d. A copy of the check issued to the contractor has also been attached to this voucher.

39. The Payment voucher marked **OM 4 - F** was part payment for the supply of scarves for the staff of the bank and details are as follows;

- a. This payment was dated October 4th 2017 and made to a contractor named Pamoni Clothing. The payment was for an amount of GHS 67,900.
- b. As per a service order attached to the Pay voucher the contract sum was GHS100,000. Also attached to the service order was the invoice from the contractor on which I had made notes on how the final contract figure was derived. This figure can also be found in a memo dated September 12th 2017.
- c. A copy of the check issued to the contractor has also been attached to this voucher. I recall that as of the time of the

receivership, we still owed this contractor for some of the work we contracted him to do.

40. The Payment voucher marked **OM 4 - G** was part payment for the interior fit-out works done at the **Airport West branch** of the bank and details are as follows;

- a. This payment was dated May 17th 2017 and made to a contractor named Bellbedz Interiors. The payment was for an amount of GHS 55,457.83.
- b. As per a service order attached to the Pay voucher the contract sum was GHS194,848.94. This figure can be found in memos dated February 9th and 13th 2017 which were attached to the voucher. The exact details of the fit-out works involved have been detailed in these memos.
- c. A copy of the check issued to the contractor has also been attached to this voucher.
- d. A work completion form confirming the performance of the service has also been attached to this voucher.

41. The Payment voucher marked **OM 4 - H** was a part payment for the interior fit-out works done at the **Atomic Junction branch** of the bank and details are as follows;

- a. This payment was dated January 20th 2017 and made to a contractor named Bellbedz Interiors. The payment was for an amount of GHS 13,572.24.
- b. As per a service order attached to the pay voucher, the contract sum was GHS67,861.20. This figure can be found in a memo dated January 20th 2017 which was attached to the memo. The exact details of the fit-out works involved have been detailed in this memo.
- c. A copy of the check issued to the contractor has also been attached to this voucher.

H. Items and Services procured using funds secured from the CEO's Secretariat.

42. In this section of my present statement, I will continue to provide **samples of payment vouchers** which provide evidence for payments made for works done and supervised by the SQ department. As I have said earlier, the payments for our activities usually came from the finance office of TBG. However, there were occasions when we had to obtain funds from the CEO's secretariat. The pay

vouchers listed below were in respect of **payments made from funds obtained from the CEO's Secretariat**. These vouchers have been marked as the **OM 5, OM 5-A, OM 5-B, OM 5-C, OM 5-D, OM 5-E and OM 5-F**.

Voucher Ref	Amount in GHS
OM 5	2,800.00
OM 5 - A	560.00
OM 5 - B	52,000.00
OM 5 - C	2,320.00
OM 5 - D	5,469.20
OM 5 - E	8,000.00
OM 5 - F	16,400.00

43. The payment voucher marked **OM 5** was a disbursement made to me. The amount involved is GHS2,800 and it occurred on May 11th 2017. According to the narration on the voucher and a memo attached to it, this disbursement was meant to cover transportation expenses for my team members.
44. The payment voucher marked **OM 5-A** was a disbursement made to me. The amount involved is GHS560 and it occurred on August 4th 2017. According to the narration on the voucher and documents attached to it, this disbursement was meant to cover the difference in cost incurred on decals and furniture pieces procured for set-up work.
45. The payment voucher marked **OM 5-B** was a disbursement made to me. The amount involved is GHS52,000 and it occurred on October 19th 2017. As per the narration on the voucher and the documents attached to it, this disbursement was for the purchase of furniture items for set-up purposes.
46. The payment voucher marked **OM 5-C** was a disbursement made to me. The amount involved is GHS2,320 and it occurred on October 30th 2017. As per the narration on the voucher and the documents attached to it, this disbursement was for the purchase of flowers and a flower plant.
47. The payment voucher marked **OM 5-D** was a disbursement made to me. The amount involved is GHS5,469.20 and it occurred on October 31st 2017. As per the narration on the voucher and the documents attached to it, this disbursement was for the purchase of floor tile carpets for a lounge at the Airport West branch of the bank

48. The payment voucher marked **OM 5-E** was a disbursement made to me. The amount involved is GHS8,000 and it occurred on November 1st 2017. As per the narration on the voucher and the documents attached to it, this disbursement was for the purchase of furniture items for set-up purposes.

49. The payment voucher marked **OM 5-F** was a disbursement made to me. The amount involved is GHS16,400 and it occurred on November 9th 2017. As per the narration on the voucher and the documents attached to it, this disbursement was for the purchase of boardroom furniture for the Airport West branch of the bank.

I. Items procured being delivered to BEIGE offices by the vendors

50. The documents **marked OM 6, OM 6-A and OM 6-B** provide evidence of several correspondence generated between my department and several other departments all of whom were playing different roles in the delivery of the projects. I will proceed to explain all of them to the court to the best of my memory.

51. The document marked **OM 6** is an email from me dated October 20th 2017. In that email, I informed Anthony Ansah [head of CBS] that my department had purchased some furniture that would be delivered to his unit. CBS, the unit that was headed by Anthony Ansah was located at Ayi Mensah near Aburi. Several other officials are copied in the email all of whom played different roles in the process. The CEO is also copied to keep him updated on the activities being undertaken. It was important to copy other officials in the emails because some of their tasks started when other persons tasks ended so it was important for us all to be informed so that together, we could achieve our goals.

52. The document marked **OM 6-A** is an email from me dated November 2nd 2017. In that email, I informed Anthony Ansah [head of CBS] that my department had purchased some furniture that would be delivered to his unit. As usual, several other officials were copied so they were all informed of the activities taking place.

53. The document marked **OM 6-B** is a trail of emails dating from June 5th – June 6th of 2018. The emails originated from me and were addressed to one Prince Appiah-Kubi. In that email, I informed Prince that my department had procured some items that were being delivered to the warehouse at CBS. In this email, I described the tiles as “Bella Caldera [brick effect tiles]”. I must say here that because my department was mainly in charge of set-up and décor, the kind of items we usually procured were specialized in nature. Examples include flower pots, special floor rugs and miscellaneous décor pieces. Some of these brick-effect tiles were used for tiling work on the frontage of the Tamale Branch. An image of this can be seen on page 101 of exhibit 66B.

J. Evidence of several items being distributed to several branches of TBB for set-up work

54. I recall that Prince Appiah-Kubi had taken over from Anthony Ansah as the new head of department of CBS. As earlier mentioned, the CBS unit was part of another subsidiary called BBS Logistics. BBS Logistics provided fleet management, procurement and warehousing services for the entire group. Due to the warehousing function that they performed, they had a large warehouse that served as a central warehouse for several vehicles and all manner of resources and logistics for moving items around. Therefore, when procurement is made of items that are plenty and bulky in nature, they are first of all sent to BBS for initial storage.
55. Thus, it is from BBS's warehouse that we planned how to distribute various items to the various branches we were working on and when items are distributed by CBS, they would normally be supported by **waybills which show which branch the items are being delivered to**. Also, because these items were being used to set up branches and my department was the team responsible for setting up the branches, the officials of my department received the items at their points of delivery. The items could also be received by officials of the projects team.
56. To confirm the statement I have just made above, I have attached and marked as exhibits **OM-7, OM 7-A, OM 7-B, OM 7-C, OM 7-D, OM 7-E, OM 7-G and OM 7-H** waybills covering items delivered from BBS to different offices that we were being set up. I would proceed to explain them in more detail as follows;
- i. The exhibit **marked OM 7** is a waybill dated 20th November 2017. It describes items being delivered to Airport West, East Legon, Dansoman roundabout and Ashaley Botwe branches. It was requested by me, signed as dispatched by Khris Hesse of BBS and signed as received by Esther Charway.
 - ii. The exhibit **marked OM 7-A** is a waybill dated 11th December 2017. It describes items being delivered to the Airport West branch. It was requested by me, signed as dispatched by Samuel Mante of BBS and signed as received by Enock Dinkyine.
 - iii. The exhibit **marked OM 7-B** is a waybill dated 18th December 2017. It describes items being delivered to the Data Centre. The location described as Data Centre was not a branch. It was another office of the bank where the ICT infrastructure of the bank was situated. The waybill was requested by me, signed as dispatched by Samuel Mante of BBS and signed as received by Osei Kuffour Ameyaw.

- iv. The exhibit **marked OM 7-C** is a waybill dated 18th January 2018. It describes items being delivered to the Kasoa Main branch of the bank. It was requested by me, signed as dispatched by Khris Hesse of BBS and signed as received by Esther Charway.
- v. The exhibit **marked OM 7-D** is a waybill dated 1st February 2018. It describes items being delivered to the Osu branch of the bank. It was requested by me, signed as dispatched by Khris Hesse of BBS and signed as received by Esther Charway.
- vi. The exhibit **marked OM 7-E** is a waybill dated 3rd February 2018. It describes items being delivered to the Anyaa branch of the bank. It was signed as dispatched by Samuel Mante of BBS and signed as received by John Maanu and requested by Esther Charway on my behalf.
- vii. The exhibit **marked OM 7-F** is a waybill dated 23rd February 2018. It describes items being delivered to the Tesano branch. It was signed as dispatched by Khris Hesse of BBS. This waybill was not signed by any recipient because perhaps none of my team members were there at the time the items arrived.
- viii. The exhibit **marked OM 7-G** is a waybill dated 11th March 2018. It describes items being delivered to the Anyaa branch. It was requested by me, signed as dispatched by Khris Hesse of BBS and signed as received by Kwame Safo.
- ix. The exhibit **marked OM 7-H** is a waybill dated 15th March 2018. It describes items being delivered to the Anyaa branch. It was requested by me and signed as received by Esther Charway.

K. Evidence of branch set-up work happening including engagements amongst the various teams involved in the projects

57. As reiterated earlier, working on the branches and making them ready for occupation by the bank involved the collaboration of a lot of departments within TBG and even the bank itself. The work had been scheduled such that each department knew when to finish their work for another department to take over. On a lot of occasions, some departments had to work hand in hand at the same time.

58. To confirm the statements I have just made above, I have attached to my present statement, documents marked **OM-8, OM 8-A, OM 8-B, OM 8-C, OM 8-D, OM 8-E, OM 8-G, OM 8-H, OM 8-J, OM 8-K, OM 8-L, OM 8-N, OM 8-P and OM 8-**

Q. These documents are emails providing evidence of several correspondence generated during the course of our work. These correspondences were amongst my department and several other departments all of whom were playing several roles in the delivery of the projects. I will proceed to explain them in more detail as follows;

- i. Exhibit **marked OM 8** is an email dated 29th September 2017 addressed to Anthony Ansah. In that email, I am asking Anthony Ansah [head of BBS] to provide my department with vehicles as my team goes around to perform finishing set-up work for branches due to be handed over to the bank. In previous sections of my present statement, I have introduced who Anthony Ansah was as well as the nature of the business of BBS. As was usual, the CEO is copied in this email so he is kept abreast with the activities ongoing.
- ii. Exhibit **marked OM 8-A** is an email dated 29th September 2017 addressed to Jeffrey Lamptey. Jeffrey Lamptey is an officer in the CEO's secretariat. I must add that the CEO's secretariat was responsible for buying and stocking all the books that were to be distributed to the mini-libraries in all the branches. In that email, I am asking Jeffrey to provide my department with books that would be placed on shelves that have been installed in **twenty-four [24]** branches.
- iii. Exhibit **marked OM 8-B** is an email dated 10th October 2017 addressed to Osei Kuffour Ameyaw. This mail was actually intended for Eunice Sika who was also an officer in the CEO's secretariat. In that email, I am asking for more books for branch set-up activities.
- iv. Exhibit **marked OM 8-C** is an email dated 23rd October 2017 addressed to Osei Kuffour Ameyaw, Erica Kyere and Wilhemina Opare-Ayeh. All of these officers were officials of the SQ team. Wilhemina is the SQ team leader for the bank in the Greater Accra Region whilst Erica is the SQ team leader of the bank in the Ashanti and Northern regions. This email is copied to Edwin Randolph [Chief Operations Officer of TBB], Charles Odonkor [Deputy Managing Director of TBB] and the CEO. This email was originated by Freddie Wuddah [head of projects at TBG] and he was seeking approval from the CEO for individuals from several different teams to conduct a recce of some upcoming branches of the bank located outside Accra. The trip was going to involve officials of both the bank and TBG.

- v. Exhibit **marked OM 8-D** is an email dated 20th November 2017 from me to Freddie Wuddah, Anthony Ansah and Michael Djanie [head of brands at TBG]. In this mail, I was requesting for cleaning works to be done on the Airport West Branch for final set-up work to be completed by November 23rd 2017 and I must add that the Airport West branch of the bank was the bank's new head office. The property was commissioned on December 15th 2017, the same day that the bank launched its universal banking operations. Thus, requesting for the clean-up to be done by November 23rd 2017 was to ensure that the property was ready for commissioning ahead of its launch date.
- vi. Exhibit **marked OM 8-E** is an email dated 28th November 2017 from me to Freddie Wuddah and Anthony Ansah. In this email, I was asking if cleaning works could commence on the Atomic branch of the bank.
- vii. Exhibit **marked OM 8-F** is an email dated 28th November 2017 from me to Anthony Ansah, Bernard Solomon [an IT officer at TBB], Pauline Preprah [a member of the CBS team], Freddie Wuddah, Alex Opoku [An IT Manager at the bank], and Charles Odonkor. This mail was simply to inform all concerned that the Airport West branch was ready to be handed over to the bank and this indeed happened because the branch was eventually commissioned by the bank on December 15th 2017.
- viii. Exhibit **marked OM 8-G** are two emails dated January 24th and 13th February 2018. In the first email, I was expressing my frustration to a vendor who had been contracted to produce suggestion boxes which were to be used as part of the set-up work. In the second email, I brought the attention of all departments involved to the need for some final cleaning work to be done on the Tabora and Kokompe branches before their planned date of handover.
- ix. Exhibit **marked OM 8-H** is an email dated 19th February 2018 from me Seyram Agbeve [an officer in the CEO's secretariat] requesting books to fill up the mini library at the Tesano branch.
- x. Exhibit **marked OM 8-J** is an email dated 1st March 2018 from me to Prince Appiah-Kubi requesting for furniture to be delivered to the Anyaa branch. I recall that in previous sections of my present statement, I made the court understand that when items were procured especially in bulk and they were first sent to BBS for storage. When a branch is ready for set-up the specific items

required for the branch were then delivered by BBS to that branch so they would be used by the SQ team in doing the set-up. Attached to this email is the architectural layout of the branch the details of which correspond to the list of furniture requested from BBS.

- xi. Exhibit **marked OM 8-K** is an email dated 14th May 2018 from me. In this email, I am informing the team at BBS of a procurement request that has been approved by the CEO. Attached to this email is a memo dated May 10th 2018. In offering his approval, the CEO had specifically stated that the procurement be “dealt with by the Procurement committee [PC]”, hence the need for me to inform BBS about this.
- xii. Exhibit **marked OM 8-L** is an email dated 5th June 2018 from me to Seyram Agbeve. In this email, I am requesting for 2 Espresso machines to be procured for the Labone branch which was at the time being worked on. I must add that the Labone branch was a premium service branch and we were very particular about how these branches were set up. Some of the items that were installed in these premium branches were selected and procured by the CEO’s secretariat. One of these was a very **sophisticated self-service coffee vending machine**. It was one of these that I was requesting for the CEO’s office to purchase and provide for me to install at the Labone branch. The images attached to exhibit OM 8-L are **2 such coffee vending machines** that were installed in separate guest lounges at the Airport West branch.
- xiii. Exhibit **marked OM 8-M** is an email trail that commenced on 5th June 2018. In that trail of emails, I was requesting for BBS to purchase a TV for my department as part of the items being used for the set-up of the Labone branch.
- xiv. Exhibit **marked OM 8-N** is three emails dated September 26th, October 6th and October 12th of 2017 respectively. All these correspondences relate to the setup of the ‘*kokonsa lounge*’ at the Airport West branch of the bank. In previous sections of my present statement, I have described the concept of the *kokonsa lounges* as part of our décor themes for premium branches of the bank. I have also already attached images of the *kokonsa lounges* of Spintex, Atomic Junction, Weija and Airport West branches of the bank which were marked **OM-1, OM-1A, OM-1B and OM-1C** respectively. Also attached and marked **OM 8-N1** are images taken of myself and Wilhemina Opare [then head of SQ at the bank] at a location somewhere in a forest area around Akropong when we were looking

for artisans to work on the features of the kokonsa lounge for Airport West branch.

- xv. Exhibit **marked OM 8-P** is an email dated November 20th 2017. In that email, I informed Bernard Solomon about the observations made by the CEO when he inspected work ongoing at the Airport West branch. Bernard Solomon was a member of the bank's IT team and he had gone to install computers at the branch.
- xvi. Exhibit **marked OM 8-Q** is an email from me dated November 16th 2017. I recall mentioning in previous paragraphs the importance attached to the mini libraries installed in all the branches. In that email, I had to draw the attention of all front office staff to the need to manage the libraries responsibly.

L. Events after the Receivership of TBB

59. Following the receivership of the bank, the bank accounts of TBG and its subsidiaries were frozen. This brought in its wake a lot of frustration as the office could barely run without funds. Eventually, the office of TBG was closed down and we all had to be laid off.

IV. CONCLUSION

60. I know that Beige Capital Savings & Loans undertook a lot of branch expansion work as part of activities marking its transition into becoming The BEIGE Bank. I know this because I was head of the Service Quality Department of TBG and my department was responsible for setting up all the branches as part of the transition of BCSL into TBB.

61. These upgrades of branches involved branches that existed prior to BCSL obtaining the universal banking license and new ones that were acquired during the transitional period. I can confirm that all the activities that were undertaken by my department as part of the transitional projects were funded by TBG using funds either received from the finance office of TBG or from the CEO's secretariat.

62. I can also confirm that the pay vouchers attached to my present statement represent a sample of many such pay vouchers evidencing payments being made for activities undertaken by the department as part of the transitional projects.

63. I can confirm that the expenditure report submitted by my department together with its related attachments were indeed the expenditures that accounted for funds received from the office [finance office of TBG and CEO's secretariat] to be utilized in executing SQ's scope of work within the projects that were being executed on behalf of the bank and I can further confirm that a lot of these projects were still ongoing at the time the bank was placed under receivership.


.....
OKBELL MAJDOUB

STATEMENT OF TRUTH.

I, **OKBELL MAJDOUB** do hereby verify the contents of my present statement as true to the best of my knowledge and honest belief.


.....
OKBELL MAJDOUB

DATED AT SORY @ LAW, ACCRA THIS 2nd DAY OF MAY 2024.

THE REGISTRAR,
HIGH COURT,
ACCRA.

AND FOR SERVICE ON THE ATTORNEY-GENERAL, ATTORNEY GENERAL'S
DEPARTMENT, MINISTRIES, ACCRA.