

IN THE SUPERIOR COURT OF JUDICATURE
IN THE HIGH COURT OF JUSTICE
ECONOMIC AND FINANCIAL DIVISION 2
ACCRA-AD 2025

Filed on 12/12/2025
12:05 am/pm
Registrar
HIGH COURT ACCRA

SUIT NO:

IN THE MATTER OF THE ECONOMIC AND ORGANISED CRIME ACT 2010
(ACT 804)

AND

IN THE MATTER OF AN APPLICATION FOR AN ORDER FOR THE CONFIRMATION OF
FREEZING OF TAINTED BANK ACCOUNTS PURSUANT TO SECTIONS 33, 34 AND 35 OF
THE ECONOMIC AND ORGANISED CRIME ACT, 2010 (ACT 804), REGULATION 13 OF L.I.
2183 AND ORDER 19 OF C.I. 47

THE EXECUTIVE DIRECTOR
ECONOMIC AND ORGANISED CRIME OFFICE
OLD PARLIAMENT HOUSE
HIGH STREET-ACCRA

APPLICANT

VRS

MUNVACO LTD
P.O.BOX 1210
OBUASI, ASHANTI
AO-210-8065

1st RESPONDENT

CBG BANK GHANA LIMITED
HEAD OFFICE
ACCRA

2nd RESPONDENT

MOTION ON NOTICE FOR AN ORDER FOR THE CONFIRMATION OF FREEZING OF
TAINTED BANK ACCOUNTS PURSUANT TO SECTIONS 33, 34 AND 35 OF THE ECONOMIC
AND ORGANISED CRIME ACT, 2010 (ACT 804), REGULATION 13 OF L.I. 2183 AND ORDER
19 OF C.I. 47

MOTION ON NOTICE to be moved by Counsel for and on behalf of the Applicant herein praying for an
order to confirm a freezing order of tainted bank accounts belonging to the 1st Respondent and described
below upon the grounds contained in the accompanying affidavit;

S/N	NAME	ACCOUNT NUMBER	BANK	BALANCE
1	MUNVACO LTD	2267009100001	CBG	228321.78 GHS
2	MUNVACO LTD	2267009640001	CBG	294 USD
3	MUNVACO LTD	2267009100002	CBG	200 USD

AND for any further order(s) as this Honorable Court may deem fit.

FR 19TH
COURT TO BE MOVED ON..... day of December, 2025 at 9'Oclock in the forenoon or so soon thereafter as Counsel may be heard.

DATED AT ACCRA THIS *11TH* DAY OF DECEMBER, 2025



SEDINA GBEVE
SOLICITORS LICENCE: eGAR03159/25
SOLICITOR FOR THE APPLICANT

LEGAL & PROSECUTION
ECONOMIC & ORGANISED CRIME OFFICE

THE REGISTRAR
HIGH COURT
ECONOMIC AND FINANCIAL DIVISION 2
ACCRA

AND COPY FOR SERVICE ON THE ABOVE-NAMED RESPONDENTS WHOSE ADDRESSES ARE AS FOLLOWS:

- 1. MUNVACO LTD**
P.O.BOX 1210
OBUASI, ASHANTI
AO-210-8065

- 2. CBG BANK GHANA LIMITED**
HEAD OFFICE, ACCRA

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**THE EXECUTIVE DIRECTOR
ECONOMIC AND ORGANISED CRIME OFFICE
OLD PARLIAMENT HOUSE
HIGH STREET-ACCRA**

- APPLICANT

VRS

**MUNVACO LIMITED
P.O.BOX 1210
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AO-210-8065**

1st RESPONDENT

**CBG BANK GHANA LIMITED
HEAD OFFICE
ACCRA**

2nd RESPONDENT

AFFIDAVIT IN SUPPORT

I, GODFRED AGU WHITE, of the Economic and Organized Crime Office, do hereby make oath and say as follows:

1. That I am the deponent herein and a Staff Officer of the Economic and Organized Crime Office.
2. That I have the authority and consent of the Applicant herein to swear to this affidavit upon facts that are within my knowledge by virtue of being one of the officers assigned to this case.
3. That the 1st Respondent is a registered corporate entity under the laws of Ghana, which is into the regular business of importing goods into the country.

4. That the 2nd Respondent is a Bank registered under the laws of Ghana.
5. That the 1st Respondent operates bank account domiciled with the 2nd Respondent.
6. That the Applicant pursuant to section 70 of Act 804 in collaboration with Bank of Good, Ministry of Finance, Ghana Revenue Authority (Customs Division) and Financial Intelligence Centre (FIC) is investigating alleged tax fraud, money laundering and other serious offences involving the use of Import Declaration Forms (IDF) and the ICUMS platform to transfer funds outside the country for the purchase of goods without any proof of importation.
7. That preliminary investigations established that the 1st Respondent transferred funds through the 2nd Respondent to the tune of Two million Three-Hundred and Twenty Nine Thousand One Hundred and Thirty Six (USD 2,329,136) between the period of 14th November, 2024 and 26th March 2025 using Import Declaration Forms (IDF) and ICUMS platform.
8. That there is no record on the ICUMS platform indicating that the purported goods have been imported into the country, and it is suspected that the 1st Respondent used the IDFs and the ICUMS platform to launder these funds outside the country to evade its statutory tax obligations.
9. That during the investigation, the Applicant pursuant to section 19 of Act 804 requested the Managing Director of the 1st Respondent to appear before the investigative team and produce documents to assist with investigation on 7th October, 2025. However, the 1st Respondent has failed to honor this request although they were duly served with the request letter.

(Please find attached a copy of the request for information letter dated 30th September, 2025 marked as Exhibit EOCO 1)

10. That the Applicant, upon reasonable suspicion that the 1st Respondent's bank accounts are being used in the commission of a serious offence, particularly money laundering, issued an administrative directive freezing the accounts of the 1st Respondent domiciled with the 2nd Respondent on 28th November 2025.

(Please find attached a copy of the administrative freezing directive marked as Exhibit EOCO 2).

11. That to prevent the Respondents from rendering the outcome of the investigations nugatory and to prevent the disposal of the funds before the final determination of this matter in Court, the Applicant prays this honorable court to confirm the freezing of funds in the account of the 1st Respondent.

WHEREFORE I, swear to this affidavit in support.



DEPONENT

SWORN AT ACCRA THIS ^{17th} .1./... DAY OF DECEMBER, 2025.

BEFORE ME

COMMISSIONER OF OATH



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THE EXECUTIVE DIRECTOR
ECONOMIC AND ORGANISED CRIME OFFICE
OLD PARLIAMENT HOUSE
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AO-210-8065

1st RESPONDENT

CBG BANK GHANA LIMITED
HEAD OFFICE
ACCRA

2nd RESPONDENT

CERTIFICATE OF EXHIBITS PURSUANT TO ORDER 20, RULES 14 (1) (2) AND (3) OF THE
HIGH COURT (CIVIL PROCEDURE) RULE, 2004 (C.I. 47)

I, PETER K. KPODO, Commissioner of Oath hereby certify that the following
Exhibits have been exhibited to the Affidavit sworn before me:

1. EXHIBIT EOCO 1 - Copy of Request Letter dated 30th September 2025
2. EXHIBIT EOCO 2 - Copy of the Administrative Freezing Directive

DATED THIS ¹¹ TH DAY OF DECEMBER, 2025

BEFORE ME



COMMISSIONER OF OATHS

EXHIBIT EOCO 1

CBG



ECONOMIC AND ORGANISED CRIME OFFICE

HEAD OFFICE

P.O. Box AC 80, Accra Ghana. Barnes Rd. Adj. Old Parliament House, High Street.
Tel: +233(0)257044779/ +233 (0)302 664786 WhatsApp: 0579709066 Digital address: GA-143-6271

Our Ref:

ESA/2/162/VII/157

CONFIDENTIAL

Your Ref:

September 30, 2025

The Managing Director
Munvaco Limited
P. O. Box 1210
Obuasi, Ashanti.
AO-210-8065

THIS IS THE DOCUMENT
EXHIBIT EOCO 1
TOP SECRET
11/11/25
DEC 25
WTA

REQUEST FOR INFORMATION PURSUANT TO SEC.19 OF ACT 804/2010

This Office is conducting investigations into alleged Money Laundering and Tax Fraud involving **Munvaco Limited**.

Information available to this Office indicates that from April 2023 to September 2025, Munvaco Limited used Import Declaration Forms (IDFs) to transfer funds, for imports. (Please find attached).

In view of this, you and the Officer in charge of imports are kindly requested to report to EOCO Head Office to meet with the Executive Director or his representative on **Tuesday October 7, 2025 at 2:00 pm** to assist with investigations.

You are also requested to furnish the Office with the following documents to show proof of imports:

1. Import Declaration Forms (IDFs)
2. Commercial Invoices
3. Bill of Lading/ Waybill
4. Bill of Entry

You may contact our investigators on **0579723314** for further information and clarification.

You are further requested to come along with your Lawyer.

Regards.

Benjamin Ndego

Ag. Deputy Executive Director/Operations

For: Executive director

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~~EXHIBIT 2~~
ECONOMIC AND ORGANISED CRIME OFFICE
HEAD OFFICE

P.O. Box AC 80, Accra Ghana. Barnes Rd. Adj. Old Parliament House, High Street.
Tel: +233(0)257044779/ +233 (0)302 664786 WhatsApp: 0579709066 Digital address: GA-143-627:

Our Ref: A/76/76/N.12/172

28th November, 2025

Your Ref:

CONFIDENTIAL

The Managing Director
CBG Bank Ghana Limited
Head Office
ACCRA.

~~EXHIBIT 2~~
~~STARTED WRITE~~
11 DEC 25
WU

ORDER OF FREEZING

PLEASE TAKE NOTICE that pursuant to authority conferred on the Executive Director by Section 33 of the Economic and Organised Crime Act, 2010 (Act 804), the Executive Director of the Economic and Organised Crime Office has directed the freezing of account numbers **below** in pending the final determination of the Court. This order takes immediate effect and shall apply to any accounts and other financial assets held by the within-named person with any branch of your Bank.

S/No.	ACCOUNT NAME	ACCOUNT NUMBER	CURRENCY
1.	BL HOME	471056100001	USD
2.	BL HOME	471056100003	USD
3.	BOAFO HENE COMPANY LIMITED	2110878100001	GHC
4.	MUNVACO LTD	2267009100001 2267009640001 2267009100002	GHC USD USD
5.	YEBBERT 25 ENTERPRISE	2066842160001 2066842640001	GHC GHC
6.	MUNTARI HAMID ENTERPRISE	2082473100001	GHC

Until this order is revoked or lapses your bank shall not allow any transaction on the account without the written authority of the Executive Director, except the following;

- Deposits/credits into the account, including but not limited to cash, transfers from other sources,
- Interest (if any),
- Deposits/credits resulting from the encashment of financial instruments such as treasury bills, bonds, shares, bills of exchange, etc and
- Additions to financial assets from other sources.

Please note that this letter supersedes our letter referenced A/76/76/V.11/202 dated 16th September, 2025.

Please be advised accordingly.

Best regards.



RAYMOND ARCHER
Ag. Executive Director

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