

Fictional sample Bill of Indictment provided for illustrative purposes only.

BILL OF INDICTMENT

IN THE SUPERIOR COURT OF JUDICATURE

IN THE HIGH COURT OF JUSTICE

ACCRA - AD 2026

THE REPUBLIC

VRS

BANGA SAMOA

The accused person is charged with the following offence;

COUNT ONE

STATEMENT OF OFFENCE

Murder contrary to section 46 of the Criminal Offences Act, 1960 (Act 29).

PARTICULARS OF OFFENCE

Banga Samoa, Trader: on or about 4th July 2025 at about 11:30pm at Barbie House, Posh Estates in the Greater Accra region intentionally caused the death of Madaline Madal by unlawful harm.

**DATED AT THE OFFICE OF THE ATTORNEY-GENERAL, ACCRA, THIS.....
DAY OF JANUARY, 2026.**

.....

**MANSAH MUSAH ATTAH
PRINCIPAL STATE ATTORNEY
FOR: ATTORNEY-GENERAL**

**THE REGISTRAR
HIGH COURT
ACCRA**

SUMMARY OF EVIDENCE

**THE REPUBLIC
VRS**

BANGA SAMOA

The Prosecution proposes to call the following witnesses at the trial:

1. **ANNA MADAL**
2. **JAKE JOHN PAUL**
3. **JACKSON JACK**
4. **DR. AMA SANTO**
5. **NO. 654321 D/CPL NANA DIASEMPA**

PW1 ANNA MADAL: Will say that she is the complainant in this case. That she is the sister of the deceased. That they live together at Pillar Estates in Accra. That the deceased and the accused were in a romantic relationship. That the deceased and the accused had been together for five months. That the two went out for dinner on 4th July 2025 at about 8:00pm in the accused's vehicle and the deceased never returned home. That the last time she saw the deceased alive was when she left home with the accused. That all calls to the deceased went unanswered. That the next morning, the police informed her that her sister was killed at the parking lot of Barbie House just before midnight on 4th July 2025. That she went with the police to the house of the accused and he was arrested.

PW2 JAKE JOHN PAUL: Will say that he is a waiter at Barbie House at Posh Estates. That on 4th July 2025, he was on duty when he saw the accused and the deceased entering the restaurant at about 9:00pm. That they had dinner and stayed until about 11:00pm. That they started arguing and the deceased walked out of the restaurant. That the accused quickly settled the bill with a visa card and rushed after the deceased. That out of curiosity, he went to the entrance to see what would happen. That the deceased was standing at the passenger side of a red Hyundai Elantra. That the accused went to the vehicle, unlocked it and got in. That while the deceased was still standing at the passenger side, the accused suddenly moved the vehicle, causing the deceased to fall. That the accused then drove the vehicle forward, running over the deceased who was still on the ground and drove off. That he screamed for help and rushed to the deceased, but she was not moving. That she had blood all over her face and was not breathing. That they could not rush her to the hospital because of the terrible condition she was in, as moving her was quite impossible. That the Barbie House manager called the police immediately and they arrived just before midnight. That he told the police everything he had witnessed.

PW3 JACKSON JACK: Will say that he is the Manager at Barbie House. That on 4th July 2025 at about 11:30pm, he heard someone shouting for help. That he rushed out and found the deceased lying down badly injured at the parking lot. That he saw a red Hyundai Elantra

speeding off. That he called the police and they came to the parking lot. That the condition of the deceased made it impossible to lift her into a vehicle for transportation to the hospital. That the parking lot is well lit and they have CCTV cameras both inside and outside Barbie House. That he played the videos for the police and also handed the files over to them. That in the video he played, he saw the accused driving over the deceased.

PW4 DR. AMA SANTO: Will say that she is a Pathologist at the Ghana Police Hospital. That on 5th July 2025, she conducted a post mortem examination on the body of the deceased. That her examination revealed that the cause of death of the deceased was severe head injury following suspected homicide involving a vehicle which is an unnatural manner of death. That she submitted a report of her findings to the police.

PW5 NO. 654321 D/CPL NANA DIASEMPA: Will say that he is a Detective Corporal stationed at Posh Divisional CID, Accra. That on 4th July 2025, the case involving the accused was referred to him for investigations. That the body of the deceased was still at the parking lot when he arrived with two other police officers. That he checked her pulse and did not detect any pulse. That the two officers conveyed the deceased to the hospital where she was confirmed dead. That he stayed behind to interrogate the witnesses at the scene. That he watched surveillance videos at Barbie House and saw that the accused run over the deceased with his vehicle. That Manager of Barbie House handed over the surveillance videos of both inside and outside the building to him on a flash drive. That he also took the printed receipt that was paid by the accused using his Gogo Bank visa card. That he took pictures of the scene including the blood stains. That the next morning on 5th July 2025, he notified the family of the deceased at about 8:00am, and a sister of the deceased Anna Madal led him to the house of the accused at about 9:00am. That he arrested the accused and a cautioned statement was taken from him at the station in the presence of his lawyer. That the waiter and Manager of Barbie House also gave witness statements on 5th July 2025. That on 6th July 2025, the accused was interrogated again and he gave another statement. That he went back to the house of the accused to take pictures of the red Hyundai Elantra which had blood stains on the passenger side front wheel. That his investigations revealed that the accused went for dinner with the deceased at Barbie House. That they had an argument around 11:00pm and exited Barbie House. That the accused ran over the deceased with his red Hyundai Elantra with registration number PP 1234 T. That a charge statement was taken from the accused on 30th December 2025 when the Attorney-General's Office recommended his prosecution on a murder charge.

LIST OF EXHIBITS TO BE TENDERED AT THE TRIAL

1. Investigation Cautioned Statement of the accused dated 5th July 2025.
2. Further Investigation Cautioned Statement of the accused dated 6th July 2025.
3. Charge statement of the accused dated 30th December 2025.
4. Post Mortem report of the deceased dated 5th July 2025.
5. Photograph of the scene of the crime with blood stains.

6. Photographs of the body of the deceased.
7. Photographs of the accused's Hyundai Elantra with registration number PP 1234 T.
8. Surveillance videos from the crime scene.
9. Barbie House customer receipt dated 4th July 2025.

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**MANSAH MUSAH ATTAH
PRINCIPAL STATE ATTORNEY
FOR: ATTORNEY-GENERAL**

**THE REGISTRAR
HIGH COURT
ACCRA**

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