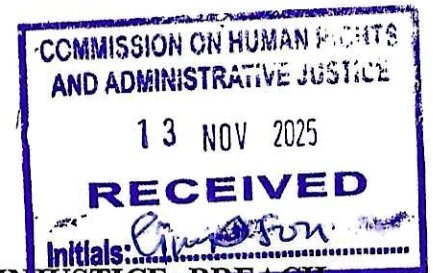


12<sup>TH</sup> November 2025

Commission of Human Rights and Administrative Justice (CHRAJ),  
Head Office Old Parliament House,  
High Street, Accra  
Post Box AC 489,  
Accra



**PETITION FOR INVESTIGATION INTO ADMINISTRATIVE INJUSTICE, BREACH  
OF FAIR ADMINISTRATIVE PROCESS, AND VIOLATIONS OF HUMAN RIGHTS**

**1.0 INTRODUCTION AND JURISDICTION**

1.1 The Petitioner, Strategic Mobilisation Ghana Limited is a limited liability company duly incorporated under the laws of Ghana, engaged by the Ghana Revenue Authority to provide transactional audit and revenue assurance services. (hereinafter referred to as "Petitioner")

1.2 The Respondent is the Office of the Special Prosecutor (OSP), a statutory body established under the Office of the Special Prosecutor Act, 2017 (Act 959), mandated to investigate and prosecute corruption and corruption-related offences. (hereinafter referred to as "Respondent")

1.3 This Petition is filed pursuant to Article 218 of the 1992 Constitution of Ghana and Section 7 of the Commission on Human Rights and Administrative Justice Act, 1993 (Act 453), seeking relief for administrative injustice, abuse of power, violation of fair administrative process, and breaches of the Petitioner's constitutional rights to administrative fairness and protection of property.

**2.0 CHRONOLOGICAL STATEMENT OF FACTS**

**2.1 The West Blue Era and Systemic Failures (2017)**

2.1.1 During 2017, the West Blue system, then operational system used by the Custom Division for Pre-Arrival to CCVR generations, experienced severe operational control failures that permitted large-scale exploitation, resulting in significant revenue leakages. These failures included the repeated approval of undervalued FOB entries, misclassification of goods, and systemic under-declarations.

2.1.2 On 16 May 2017, **Mr. Isaac Crentsil**, then Commissioner of Customs, revoked the Customs House Agent licences of **His Majesty Freight Services Ltd.** and **J.B.S. Haulage & Construction** due to regulatory infractions that occurred during the period of West Blue's operational failures. *Please find attached Appendix 'A'.*

2.1.3 At that material time, **Mr. Albert Akurugu**, who currently serves as the Lead Investigator of the OSP for the SML case, was a functional Customs Officer involved in port operations and part of technical team to ensure the smooth running of the Ghana National Single Window which was being handled by West Blue. *Please find attached Appendix 'B'.*

**2.2 SML's Engagement and Demonstrated Performance (2018)**

2.2.1 Following the exposure of West Blue's shortcomings, the Ghana Revenue Authority engaged the Petitioner to provide transactional audit and revenue assurance services to rectify the systemic lapses.

2.2.2 Within the first two months of its assignment, the Petitioner identified and documented the deficiencies of the existing system, resulting in fiscal recoveries exceeding USD 1.35 million, as validated in assurance reports. *Please find attached USB for Appendix 'C'.*



### **2.3 Development of Retaliatory Animosity (2017 and Ongoing)**

2.3.1 Mr. Isaac Crentsil, former Commissioner of Customs, stated at the interrogation that Mr. Albert Akurugu accused him of "allowing SML to take the job of West Blue," and declared his intent to ensure that neither **Mr. Evans Adusei** (Petitioner's CEO) nor SML "ever works again."

2.3.2 In a boastful display of extreme arrogance, Mr. Albert Akurugu posited that he brought in West Blue and the Petitioner had come to take over their work. This was the conclusion the Respondent reached in the published OSP report.

2.3.3 It is clearly at variance with the facts on the ground. If any company were to be accused of having taken over another company's job, then ICUMS would have borne that accusation and not SML. The fact is that West Blue contract not renewed when it expired was because GRA was introducing the single-window platform operated by Ghana Link.

### **2.4 Pre-Raid Threatening Communications (Immediately Prior to Raid)**

2.4.1 Days before the OSP's raid on the Petitioner's offices, the Director of **His Majesty Freight Services Ltd.** and **J.B.S. Haulage & Construction** sent threatening WhatsApp messages to former Commissioner Customs Division, Mr Isaac Crentsil. These messages included statements such as "What goes round comes around," "SML is in the waiting," and "What did you gain for suspending these companies," directly referencing the 2017 regulatory actions. *Please find attached Appendix 'D'.*

### **2.5 The Unlawful Raid and Mishandling of Evidence (10<sup>th</sup> June 2025)**

2.5.1 The OSP conducted unlawful raids on the Petitioner's Osu and Tema offices, during which servers, firmware, firewalls, and SCADA components were destroyed and seized. *Please find attached for Appendix 'E'.*

2.5.2 Prior to the commencement of the search, the Respondent's agents deliberately dismantled the CCTV infrastructure at the premises, constituting a willful attempt to obstruct potential evidentiary material and shield the agents from accountability.

2.5.3 The seizure and handling procedures violated nationally and internationally recognized standards/statutes on chain-of-custody, forensic imaging, evidence preservation, and the handling of digital systems, demonstrating a preconceived plan to inflict operational harm and compromise proprietary systems.

2.5.4 During the interrogation of the Petitioner's CEO, Mr. Evans Adusei, **Mr. Albert Akurugu** declared that because SML had "ended the job of West Blue," he would personally ensure that Mr. Evans Adusei "never works again." And that "The petitioner's servers would not work again"

2.5.5 **Mr. Albert Akurugu** comments cited above during interrogation to both Mr. Evans Adusei and former Commissioner, Customs Division Mr. Isaac Crentsil were captured on the Respondents own video recording system and remain in the custody of the Respondent.

### **2.6 Publication of the Biased OSP Report (Post-Raid)**

2.6.1 Despite the availability of extensive documentary and technical evidence from statutory institutions (GRA, NPA, MoF, Standard Authority etc.) that disproved the allegations, the Respondent proceeded to publish a report that is demonstrably inaccurate and damaging.

2.6.2 The Report repeatedly praised the **West Blue** system and downplayed the necessity of the Petitioner's work, adopting an inexplicably favourable narrative of West Blue while discrediting the Petitioner's contributions. *Please find attached for Appendix 'F'.*



2.6.3 The Report deliberately suppressed evidence of West Blue's systemic failures and the Petitioner's fiscal recoveries, instead portraying West Blue as competent and the Petitioner as unnecessary. *Please find attached for Appendix 'C'.*

2.6.4 The Report deliberately mischaracterised the Petitioner's founder as inexperienced and the Petitioner as an incapable entity, despite the Respondent's possession of extensive documentary records detailing the founder's over thirty-year track record of legitimate entrepreneurial activity across regulated sectors. *Please find attached USB for Appendix 'G'.*

### 2.7 Subsequent Actions by the Petitioner

- 2.7.1 The Petitioner re-submits all documentary and technical evidence previously available to the OSP, validated by statutory institutions, to support a fair reconsideration. *Please find attached files labelled Appendix 'H'.*
- 2.7.2 Sometime in March 2025, the Petitioner received a letter requesting information and production of documents from one Mr Emmanuel A. Basintale, Director of Investigations at the OSP. The Petitioner duly supplied the information and corresponded with the said Emmanuel A. Basintale.
- 2.7.3 Strangely, on the 10<sup>th</sup> June 2025, there was a raid by the OSP at the offices of SML (Osu and Tema) which raid was led by the Mr. Albert Akurugu himself. But for inexplicable reasons, subsequent correspondences and investigations were taken over by Mr. Albert Akurugu.
- 2.7.4 From the first day of interrogation, Mr. Albert Akurugu never hid his bias so far as this investigation was concerned. Mr. Albert Akurugu having close ties with West Blue took on the role as the Lead Investigator of the SML case showing clear conflict of interest in his conduct of the investigations.
- 2.7.5 Given the scale, coordination, and institutional posture of the misconduct, the Petitioner reasonably believes that the Special Prosecutor, **Mr. Kissi Agyebeng**, may have been aware of, acquiesced in, or acted in concert with **Mr. Albert Akurugu's** conduct.

## 3.0 GROUNDS OF PETITION

**3.1 Abuse of Power and Administrative Injustice:** The Respondent's actions constitute a gross abuse of discretionary power, driven by personal vendetta rather than lawful investigative purpose, in violation of the principles of natural justice and fair administrative process.

**3.2 Bias and Compromised Neutrality:** Mr. Akurugu's personal animus, prior involvement in the West Blue operationalisation and open declarations of hostility, disqualified him from acting as a neutral investigator, rendering the entire investigative process compromised.

**3.3 Violation of Digital Forensic Standards:** The deliberate mishandling of digital evidence and destruction of servers breached national and international recognized forensic protocols and the Petitioner's rights to protection of property.

**3.4 Unlawful Interference with Business Operations:** The preconceived plan to inflict operational harm, dismantle technical infrastructure, and destroy business operations constitutes an unprofessional interference with the Petitioner's legitimate economic interests.

**3.5 Suppression of Evidence and Misrepresentation:** The Respondent's suppression of documentary proof, mischaracterisation of verified business credentials, and distortion of factual records demonstrate bad faith and prejudice.

**3.6 Obstruction of Justice:** The deliberate dismantling of CCTV infrastructure prior to the raid constitutes obstruction of potential evidence and shields agents from accountability.

**3.7 Threats and Intimidation:** The explicit threats made by the Lead Investigator to permanently destroy the Petitioner's business and professional reputation constitute psychological torture and intimidation, prohibited under Article 15 of the Constitution.

#### **4.0 REQUEST OF THE PETITIONER TO CHRAJ**

**4.1 Investigate and Find** that the OSP's investigation and report were tainted by bias, personal animus, and retaliatory motives, constituting administrative injustice.

**4.2 Investigate and Find** that **Mr. Albert Akurugu** engaged in a conduct unbecoming of a public officer, abused his power, and compromised the integrity of the investigative process.

**4.3 Expand its inquiry** to include the possible involvement, oversight failures, or complicity of the Special Prosecutor, **Mr. Kissi Agyebeng**, in the misconduct complained of.

**4.4 Order** the OSP to produce the video recordings of interrogation sessions where threats were made, for independent review.

**4.5 Recommend** appropriate sanctions against all public officers found to have engaged in misconduct, abuse of power, or administrative injustice.

**4.6 Make** such further orders or directions as the Commission may consider just and equitable in the circumstances.

#### **5.0 VERIFICATION**

The Petitioner verifies that the facts stated herein are true and correct to the best of its knowledge and belief.

**DATED** at SML Osu Office this 12 day of November, 2025.



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**EVANS ADUSEI**  
CEO





**LIST OF ANNEXURES:**

1. Appendix A - Revocation of Agent Licence Letters
2. Appendix B - Ghana National Single Window Brochure
3. Appendix C - June and July 2018 Transaction Performance Report
4. Appendix D - Screenshot of WhatsApp messages
5. Appendix E - Pictures of Post Raid and Police Report
6. Appendix F - Paragraph of pages in the OSP report that promoted West Blue
7. Appendix G - CEO Profile
8. Appendix H – Response Dossier to all OSP Allegations