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Scoping Report:
Independent Review regarding allegations
of the disappearance of new Liberian Dollar
banknotes

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Contents

1.	Introduction.....	4
2.	Methodology.....	5
2.1	Introduction.....	5
2.2	Requesting and obtaining relevant information.....	5
2.3	Interaction with key stakeholders.....	5
2.4	Physical walkthrough assessments.....	5
2.5	Currency conversion.....	6
2.6	Limitation of Scope.....	6
3.	Executive Summary.....	8
3.1	Introduction.....	8
3.2	Summary of key findings.....	9
4.	Legislature approval for printing new banknotes.....	17
4.1	Introduction.....	17
4.2	Approval for new banknotes totaling LRD 5.0 billion.....	18
4.3	Approval for new banknotes totaling LRD 10.0 billion.....	22
4.4	Conclusion.....	24
5.	Procurement and contracting of Crane AB.....	26
5.1	Introduction.....	26
5.2	Procurement of Crane AB.....	26
5.3	Contract between CBL and Crane AB dated May 6, 2016.....	30
5.4	Contract between CBL and Crane AB dated June 12, 2017.....	36
5.5	Evaluation of contract price.....	41
5.6	Conclusion.....	42
6.	Shipping and delivery of new banknotes.....	44
6.1	Introduction.....	44
6.2	Shipping of new Liberian Dollar banknotes.....	44
6.3	Delivery of new Liberian Dollar banknotes.....	45
6.4	Potential discrepancies in shipping/delivery documentation.....	46
6.5	Conclusion.....	51
7.	Fund movements within the CBL.....	53
7.1	Overview of vaults.....	53
7.2	Summary of other reconciliations performed.....	60
7.3	Conclusion.....	63
	Appendices.....	65

1. Introduction

In August 2018, the Government of Liberia received reports about suspicious activities concerning the shipment of new Liberian Dollar (hereafter “**LRD**”) banknotes totaling LRD 15.506 billion to the Central Bank of Liberia (hereafter the “**CBL**”) that had allegedly gone missing, and subsequently requested the Liberia National Police (hereafter the “**LNP**”) and the National Security Agency (hereafter the “**NSA**”) to investigate the allegations.

Based on initial findings from the LNP and NSA, the Government of Liberia established a Presidential Investigation Team (hereafter the “**PIT**”) comprised of members of the LNP, NSA and the Financial Intelligence Unit of Liberia (hereafter the “**FIU**”) to investigate the circumstances surrounding the printing and shipment of new banknotes from January 2016 to August 2018.

On September 24, 2018 the Government of Liberia expanded the members of the PIT to include the Liberia Anti-Corruption Commission (hereafter the “**LACC**”) and reconfigured the PIT by establishing a Technical Committee comprising of the LACC (as Chairperson), LNP (as Co-Chairperson) and FIU (as Coordinator).

On October 1, 2018 Nathaniel Patray, the Executive Governor of the CBL issued a public statement that, based on an internal assessment, all LRD 15.506 billion of the new banknotes had been placed in the CBL’s reserve vaults and that no new banknotes were missing.

At the request of the Government of Liberia, the United States Agency for International Development (hereafter “**USAID**”) issued a tender to contract an independent forensic investigation firm to conduct a scoping report engagement to ascertain the basic facts of the alleged disappearance of the new banknotes, and to determine to what extent a broader investigation would be required into the matter to help achieve a clearer understanding of the currency situation.

Kroll Associates, Inc. (hereafter “**Kroll**”) was engaged by USAID on November 21, 2018 to undertake a scoping report (hereafter the “**Independent Review**”) into the alleged disappearance of new banknotes. The allegations relate to new banknotes ordered by the CBL from Crane AB, a Swedish banknote manufacturer. Crane AB operates as a subsidiary of a US corporation, Crane and Co. Inc.

For confidentiality purposes, Kroll has redacted commercially sensitive information and removed the names of non-elected or confirmed persons in this report.

2. Methodology

2.1 Introduction

The methodology for conducting the Independent Review was categorized into three key phases:

1. A concise information gathering phase;
2. A detailed forensic audit procedures phase; and
3. A reporting phase, with recommendations for possible further investigations.

Kroll completed Phase 1 in Monrovia, Liberia, from December 2, 2018 to December 13, 2018. Kroll liaised with representatives from the Government of Liberia, the CBL and Crane AB in the subsequent period after the fieldwork to request and obtain relevant information and to address queries and gaps in documentation.

2.2 Requesting and obtaining relevant information

Throughout the Independent Review Kroll obtained detailed briefings from members of the CBL senior management team and representatives from Crane AB in relation to the contracts between the two parties for new banknotes.

Kroll requested and obtained relevant information from the CBL relating to the procurement and contracting of Crane AB, the receipt of new banknotes from Crane AB and the movement of the new banknotes into and out of the CBL. Kroll separately requested and obtained relevant information from Crane AB, relating to the contracting, shipment and delivery of the new banknotes.

2.3 Interaction with key stakeholders

As part of the Independent Review, Kroll held meetings and conference calls with a wide-ranging group of individuals from the Government of Liberia, including the CBL, Crane AB and logistics companies.

2.4 Physical walkthrough assessments

Kroll completed several physical walkthrough assessments of the internal and external surroundings of the CBL Headquarters (and a separate offsite reserve vault in the Waterside area of Monrovia,

Liberia) during the Independent Review to assess the physical security controls established to safeguard new and legacy banknotes.¹

Specific recommendations to enhance the physical security controls are not enclosed in this report to protect the confidentiality of the overall security environment at the CBL.

2.5 Currency conversion

Throughout this document, Kroll converted LRD to USD values for certain financial data and supporting documentation where appropriate using data obtained from Oanda.²

Kroll used a blended three-year average rate of exchange to the year ending December 31, 2018 for all conversions of LRD to USD. The rate used is USD 1 = LRD 112.16.

2.6 Limitation of Scope

USAID tasked Kroll to conduct a scoping report engagement to ascertain the basic facts of the alleged disappearance of new Liberian Dollar banknotes, and to determine to what extent a broader investigation would be required into the matter.

Kroll undertook an initial two-week scoping phase in Monrovia, Liberia to request and gather relevant information and to obtain debriefs from CBL personnel. The scoping report engagement relied upon Kroll being provided with complete documentation by representatives of the CBL. A number of Kroll's requests for documentation remain outstanding.

Certain information provided by the CBL in respect of the movements of new banknotes into and out of the CBL vaults was not immediately available, contained inaccuracies and was incomplete.

In order to fully complete the agreed scope of work, Kroll used the four-week period following the initial two-week scoping phase to explore certain issues in further detail to obtain clarity on the key findings set out in this report.

Due to gaps in the documentation provided by the CBL, Kroll also requested and obtained information from Crane AB regarding two banknote printing contracts that the CBL entered into with the company.

This scoping report sets out the basic facts in relation to the movement of Liberian Dollar banknotes based on documentation currently provided, and highlights gaps in the documentation that warrant further understanding.

¹ Note: 'Legacy' banknotes are those issued by the CBL prior to the 'New' banknotes manufactured by Crane AB.

² Source: www.oanda.com/

Kroll's scope of work covered the period January 1, 2016 to December 7, 2018 (unless explicitly stated when discussing the time period of information provided).

3. Executive Summary

3.1 Introduction

Kroll has identified discrepancies at every stage of the process for controlling the movement of banknotes into and out of the CBL during the Independent Review, including: the Legislature approval for printing new banknotes; the procurement and contracting of Crane AB; the shipping of new banknotes to Liberia; the delivery of new banknotes to the CBL, and; the movement of funds within and out of the CBL's vaults.

Kroll's Independent Review has identified the following key findings, based on the documents provided during the scoping phase of work:

- The CBL ordered new currency totaling LRD 15.0 billion from Crane Currency in two tranches in 2016 and 2017. Communications between the CBL and the Legislature indicate that there was no clear or consistent strategy driving the process to circulate new banknotes from inception to conclusion. As a result, this raised the risk of unintended negative economic effects, including high inflation and the rapid depreciation of the LRD.
- Legislature approval was granted on May 17, 2016 for the CBL to print new banknotes totaling LRD 5.0 billion. However, Crane AB was awarded an initial contract on May 6, 2016 by the CBL to print new banknotes totaling LRD 5.0 billion, eleven days before the Legislature approval was granted.
- Legislature approval was not granted in the same manner as 2016 for the CBL to print a second tranche of new banknotes totaling LRD 10.0 billion in 2017.
- Crane AB was awarded the second contract in June 2017 by the CBL to print new banknotes totaling LRD 10.0 billion, four weeks before two officials from the Legislature requested that the CBL replace all legacy banknotes.
- The CBL procured the services of Crane AB for both contracts without adhering to its own internal tendering policies for procurement.
- The actual value of new banknotes printed by Crane AB to Liberia totaled LRD 15.506 billion, therefore new banknotes totaling LRD 0.506 billion were printed by Crane AB above the initial contractual amount of LRD 15.0 billion.
- Records provided by Crane AB and its logistics company provided a documentation trail for new banknotes totaling LRD 15.506 billion having been shipped by Crane AB. Records also show that the CBL paid Crane AB for new banknotes totaling LRD 15.506 billion. However, delivery

documentation provided by the CBL indicated that Crane AB printed and shipped a greater quantity of banknotes to Liberia.

- Of the new banknotes printed and shipped by Crane AB totaling LRD 15.506 billion, the CBL had injected new banknotes totaling LRD 10.146 billion into the Liberian economy without removing from circulation (and destroying) the equivalent quantity/value of legacy banknotes.
- Under the direction of the Minister of Finance, the President's Economic Management Team conducted a separate USD 25.0 million exercise to "mop-up" excess LRD banknotes with USD banknotes. At the time of Kroll's review, this resulted in LRD 2.3 billion (USD 15.0 million)³ being purchased by the CBL from local businesses and foreign exchange bureaus, in an attempt to address the depreciation of the Liberian Dollar. This action was undertaken by the CBL without a clearly documented strategy.
- Kroll's independent counts of the physical cash balances in each of the CBL's three operational vaults could not be reconciled with the CBL's corresponding financial accounting records.

The aforementioned key findings are summarized in more detail in the subsequent sections below.

3.2 Summary of key findings

3.2.1 Discrepancies in Legislature approval and Contract approval for new banknotes

3.2.1.1 Legislature approval for new banknotes totaling LRD 5.0 billion

On May 17, 2016 the Legislature granted approval for the CBL to print new banknotes totaling LRD 5.0 billion. The Legislature approval was provided in a document titled 'Senate Resolution #002'.

Senate Resolution #002 sets out the denominations, quantities and amounts of the new banknotes to be printed, and states that the printing of new banknotes was to "...address the acute shortage of Liberian Banknotes on the market and the corresponding financial crisis associated with it that could border on the national security of the country."

However, Kroll has established that the CBL entered into a contract with Crane AB on May 6, 2016 to print new banknotes totaling LRD 5.0 billion: eleven days prior to the CBL receiving full Legislature approval to print new banknotes.

³ Note: The CBL used the exchange rates set out in Section 7.1.2.1 to calculate USD values for this exercise.

3.2.1.2 Legislature approval for new banknotes totaling LRD 10.0 billion

Following on from the May 2016 Legislature approval to print new banknotes totaling LRD 5.0 billion, the CBL requested in May 2017 that the Legislature approve a second request to print new banknotes totaling LRD 10.0 billion.

The Legislature did not grant approval for the CBL to print new banknotes totaling LRD 10.0 billion.

Instead, a letter dated July 19, 2017 from Honorable Mildred Sayon, Chief Clerk of the House of Representatives, and Nanborlor Singbeh Sr., Secretary of the Senate, provided an instruction to the CBL to “...replace the legacy notes completely with newly printed banknotes” but with a clear caveat that the CBL provide the Legislature with details of the quantity and denominations of the new banknotes “...prior to the printing” of the new banknotes.

The CBL did not provide the Legislature with details of the quantity and denominations of the new banknotes prior to the printing and shipping of new banknotes.

Notwithstanding the lack of Legislature approval, the CBL proceeded to enter into a contract with Crane AB on June 12, 2017 to print new banknotes totaling LRD 10.0 billion: four weeks prior to the letter dated July 19, 2017 from the Legislature.

3.2.2 Discrepancies in the CBL process to procure Crane AB

Kroll was not provided with adequate supporting documentation to demonstrate that the CBL adhered to its internal tendering policies in the procurement of the external banknote manufacturer Crane AB.

Despite CBL Management stating in Board of Governors meeting minutes that two other vendors also submitted proposals to print and supply new banknotes, Kroll has only been provided with limited email correspondence that does not demonstrate that either company had an opportunity to submit a formal proposal for services, and it appears that a competitive procurement process did not take place.

CBL Management subsequently explained to Kroll that due to the urgency for new banknotes, the CBL did not follow its own internal tendering policies for the procurement of Crane AB. The explanation of urgency for new banknotes provided by CBL Management was inconsistent with letters sent several months prior to the initial procurement of Crane AB. A letter dated December 2015, sent by the then Executive Governor Joseph Mills Jones, and a letter dated February 2016, sent by the then Acting Executive Governor Charles Sirleaf, to the then President of Liberia, Ellen Johnson Sirleaf, set out that new banknotes were urgently required. Therefore it is possible that the CBL could have commenced preparations to complete a competitive procurement process several months before Crane AB was contracted to print new banknotes in May 2016.

3.2.3 Discrepancies in quantity/value of new banknotes shipped by Crane AB to Liberia

Kroll's analysis of shipping documentation provided by Crane AB (i.e., those records detailing the physical movement of new banknotes from the point of manufacture in Sweden, to either the Freeport of Liberia or Roberts International Airport in Monrovia) has confirmed that the company ultimately printed new banknotes totaling LRD 15.506 billion: this equated to the over-printing of new banknotes totaling LRD 0.506 billion more than the contractually agreed quantity/value.

The first contract in May 2016 for LRD 5.0 billion included a clause that permitted a fluctuation in the actual quantity of banknotes delivered of $\pm 1.5\%$ for each denomination, subject to side letters being mutually agreed between the CBL and Crane AB. The actual overall variance in the quantity of banknotes shipped was 5.11%. No formal side letters were provided by Crane AB or the CBL to show that the over-printing of new banknotes was mutually agreed between the two parties.

The second contract for LRD 10.0 billion did not have any fluctuation clause.

Documentation shows that the CBL did pay for the printing of all new banknotes totaling LRD 15.506 billion.

3.2.4 Discrepancies in quantity/value of new banknotes delivered to the CBL vaults

The mandate for Kroll's Independent Review was in part prompted by Liberian and international media reports covering the alleged disappearance of the new banknotes, which included allegations that a container of new banknotes shipped by Crane AB to Liberia and subsequently delivered from either the Freeport of Liberia or Roberts International Airport to the CBL was missing.

Kroll's analysis of delivery documentation provided by the CBL (i.e., those records detailing the physical movement of new banknotes from the Freeport of Liberia or Roberts International Airport to the CBL) records that new banknotes totaling LRD 15.506 billion were received at either the CBL Headquarters reserve vault (hereafter the "**HQ Reserve Vault**") or at an additional reserve vault at the former National Housing and Savings Bank (hereafter the "**Waterside Reserve Vault**").

The CBL Internal Audit Department provided Kroll with delivery documentation in the form of CBL Internal Audit Memorandums (hereafter "**IA Memorandums**") and appended Crane AB packing lists. The Crane AB packing lists were used by the CBL Internal Audit Department to reconcile the receipt of new banknotes from either the airport or seaport into the CBL reserve vaults.

The IA Memorandums stated that Crane AB printed and shipped new banknotes totaling LRD 15.506 billion, yet the appended Crane AB packing lists provided to Kroll by the CBL indicated that Crane AB printed and shipped new banknotes totaling LRD 17.450 billion, a difference of LRD 1.944 billion. The issue specifically related to an IA Memorandum dated December 10, 2017 which stated new banknotes

totaling LRD 1.173 billion were delivered to the CBL, whereas the appended Crane AB packing lists stated new banknotes totaling LRD 3.117 billion were shipped to the CBL, the same LRD 1.944 billion difference.

The CBL Internal Audit Department subsequently explained that the Crane AB packing lists provided to Kroll were communicated by Crane AB in draft format for the purposes of preparing customs documentation. The CBL Internal Audit Department also stated that certain IA Memorandums may have included appended draft format Crane AB packing lists in error.

The CBL Internal Audit Department commented that owing to a series of shipping delays in December 2017 the Crane AB packing lists provided to Kroll were therefore not reflective of the actual value of new banknotes delivered to the CBL which totaled LRD 15.506 billion. Crane AB has categorically stated that new banknotes totaling LRD 15.506 billion were printed and shipped to Liberia.

As noted in Section 2.6, the overall accuracy and completeness of the CBL's internal records was considered to be inadequate. Nonetheless, there was an inconsistency in shipping records provided by Crane AB stating that new banknotes totaling LRD 15.506 billion were shipped to Liberia, compared to the Crane AB packing lists appended to IA Memorandums provided to Kroll by the CBL, which indicated that new banknotes totaling LRD 17.450 billion were delivered to the CBL.

3.2.5 Discrepancies in payments made by CBL for over-printing of new banknotes

In December 2016 the CBL made a supplemental payment of [REDACTED] to Crane AB for the over-printing of 4,250,000 pieces of new banknotes for the first contract, equivalent to the contractual rate in relation to the original order (i.e., [REDACTED] per banknote).⁴ It was not clear whether CBL Board of Governors or Legislature approval was required for the additional payment made by the CBL to Crane AB.

In March 2018 the CBL made a payment of [REDACTED] to Crane AB for the over-printing of 2,730,000 new banknotes for the second contract.⁵ The supplemental payment for the over-printing of new banknotes for the second contract was calculated *without* deducting the cost of 750,000 new LRD 20 denominated banknotes which were not delivered to the CBL (contract quantity 50,000,000 banknotes, actual quantity printed 49,250,000 banknotes).

The cost of printing 750,000 banknotes at the contractual rate (i.e., [REDACTED] per banknote) was [REDACTED]: this amount therefore represented an over-payment by the CBL to Crane AB.⁶ Again, it was

⁴ Note: 4,250,000 banknotes multiplied by [REDACTED] equals [REDACTED].

⁵ Note: 2,730,000 banknotes multiplied by [REDACTED] equals [REDACTED].

⁶ Note: 750,000 banknotes multiplied by [REDACTED] equals [REDACTED].

not clear whether CBL Board of Governors or Legislature approval was required for the additional payment made by the CBL to Crane AB.

3.2.6 Discrepancies in the intended purpose of new banknotes

3.2.6.1 First contract for LRD 5.0 billion

The first contract in May 2016 for LRD 5.0 billion received Legislature approval to address a shortage of LRD banknotes on the market, and for the new banknotes to be “*infused*” into the Liberian economy.

As of December 2018, the CBL had circulated all of the new banknotes printed in relation to the first contract (including the over-printed new banknotes), of which LRD 3.759 billion had been injected into the Liberian economy *without* removing from circulation and destroying the equivalent quantity/value of legacy banknotes. Table 1 summarizes this information.

Table 1: Summary of new banknotes from first contract for LRD 5.0 billion injected into economy

Description	Amount (LRD)
Value of new banknotes received by CBL for First Contract	5,146,250,000
Value of legacy Liberian Dollars (destroyed in period Feb. 2017 to Aug. 2017)	-1,386,750,000
Total increase in value of banknotes in circulation as a result of First Contract	3,759,500,000

3.2.6.2 Second contract for LRD 10.0 billion

As of December 2018, the CBL had circulated LRD 9.302 billion (or 90%) of the new banknotes from the second contract for LRD 10.0 billion (including the over-printed new banknotes), of which LRD 6.387 billion had been injected into the Liberian economy *without* removing from circulation and destroying the equivalent quantity/value of legacy banknotes. Table 2 summarizes this information.

Table 2: Summary of new banknotes from second contract for LRD 10.0 billion injected into economy

Description	Amount (LRD)
Value of new banknotes received by CBL for Second Contract	10,359,750,000
Value of legacy Liberian Dollars collected (destroyed in period Oct. 2017 to Aug. 2018)	-2,672,400,000
Value of legacy Liberian Dollars collected (pending destruction)	-243,550,315
Total increase in value of banknotes in circulation as a result of Second Contract	6,386,949,685

Notwithstanding the lack of clear Legislature approval in 2017 to print new banknotes, the letter dated July 19, 2017 from the Legislature to the CBL stated that all legacy banknotes (whether mutilated or good-quality banknotes) should be replaced with new banknotes in the Liberian economy. The CBL reiterated this intended purpose in a Board of Governors resolution (‘Resolution No. BR-06-/2017’) which stated that “*The Legislature has expressed to the CBL, through its letter dated July 19, 2017, its*

full consent for the printing and subsequent issuance of new L\$ bank notes; the simultaneous replacement of all legacy L\$ banknotes; and the introduction of L\$ coins in lower denominations”.

The CBL did not use all the new banknotes for the intended purpose of replacing all legacy banknotes with new banknotes.

Therefore, new banknotes totaling LRD 6.387 billion from the second contract for LRD 10.0 billion were injected by the CBL into the Liberian economy without Legislature approval. Combined with the new banknotes totaling LRD 3.759 billion from the first contract injected by the CBL into the Liberian economy, it is possible that new banknotes totaling LRD 10.146 billion were injected into the Liberian economy in total.

Despite repeated requests from Kroll, the CBL has not provided an explanation as to which individual(s) within the organization, or the Government of Liberia, approved the injection of the new banknotes into the Liberian economy, without effectively removing from circulation the equivalent quantity/value of legacy banknotes.

Kroll has sought to obtain information from the CBL regarding the end recipient of the new banknotes (e.g., commercial banks, Liberian Ministries etc.) however the CBL has not been able to provide this information. Consequently, there is a risk that significant funds were (and remain) unaccounted for by the CBL, and Kroll therefore recommends that this matter merits further understanding.

3.2.7 Discrepancies in relation to the USD “Mop-Up” Exercise

In July 2018, President George Weah (hereafter “**President Weah**”) announced that USD 25.0 million would be “*infused*” into the Liberian economy to “*mop-up*” excess LRD banknotes in an attempt to address the depreciation of the Liberian Dollar (hereafter the “**USD Mop-Up Exercise**”).⁷

Kroll’s open-source research showed that President Weah mandated an Economic Management Team chaired by the Honorable Samuel Tweah, the Minister of Finance and Development Planning, and the CBL to implement the USD Mop-Up Exercise.

The CBL advised Kroll that the USD Mop-Up Exercise involved CBL Banking Department representatives undertaking the physical purchase of LRD banknotes from local businesses and foreign exchange bureaus, with the seller being reimbursed for the value of purchased LRD banknotes with new USD banknotes. Kroll was not provided with documentation setting out how the USD Mop-Up Exercise was structured or implemented, or which organizations were targeted by the CBL.

⁷ Note: The term “mop-up” was used extensively in CBL documentation to describe the exchange of LRD banknotes with USD banknotes.

Kroll has reviewed documentation that showed an order was placed on July 10, 2018 to draw down funds totaling USD 20.0 million from the CBL's Federal Reserve Bank of New York account to fund the USD Mop-Up Exercise. The date of the order (July 10, 2018) was made several days in advance of the Board of Governors decree (July 16, 2018). It is not clear if the draw down was made earlier than approval was provided for the USD Mop-Up Exercise.

Kroll's analysis of information provided by the CBL identified that LRD banknotes totaling LRD 2.3 billion (USD 15.0 million) were purchased for the USD Mop-Up Exercise between July 2018 and October 2018.

Kroll was informed by the CBL that the remaining USD 5.0 million was put into circulation as part of normal banking operations, and not retained for continuance of the USD Mop-Up Exercise.

According to a CBL Board of Governors decree dated July 16, 2018, the purchased LRD banknotes should have been sorted and "sterilized" by the CBL prior to recirculation for a minimum period of one year.⁸ Instead, LRD banknotes totaling LRD 1.2 billion (USD 7.8 million) of the total banknotes removed from circulation as part of the USD Mop-Up Exercise have subsequently been reintroduced back into circulation within six months. The CBL has not provided Kroll with evidence that the Board of Governors had authorized the banknotes to be reintroduced back into circulation before the period of one year had elapsed.

The approach taken by the CBL to implement the USD Mop-Up Exercise, whereby small teams of bank personnel directly purchased LRD banknotes from local businesses and foreign exchange bureaus in exchange for USD notes, created an enhanced level of risk with respect to: i) potential misappropriation of banknotes, ii) potential opportunities for money laundering and iii) potential execution of transactions with illegal businesses. Consequently, there is a risk that significant funds were unaccounted for by the CBL, and Kroll therefore recommends that this matter merits further understanding.

3.2.8 Discrepancies in Kroll and Internal Audit reconciliations of vault balances

The CBL Headquarters house four vaults: the HQ Reserve Vault for storing new banknotes not yet put into circulation; and three operational vaults, for managing day to day requirements for banknotes.

The process for maintaining documentation for the physical movement of new and legacy LRD denominated and USD denominated banknotes within the CBL were based on handwritten forms used to document banknotes into and out of the operational vaults, without checks and balances to independently verify accurate data entry.

⁸ Note: "Sterilized" refers to banknotes that have been assessed by CBL staff as being of sufficient quality for recirculation.

The issue was compounded by the CBL not having the specialist electronic systems in place to provide access to real-time management information (i.e., software that enabled the CBL to record and produce details of all financial transactions). Therefore, the process to record the movements of banknotes in and out of the operational vaults was susceptible to error and/or intentional falsification. As a result, key operational reports were not available without significant manual manipulation of data by the CBL Banking Department.

Kroll has undertaken independent counts of the physical cash balances in each of the CBL's three operational vaults. Kroll was unable to reconcile the quantity/value of legacy banknotes stored in the operational vaults with the CBL's corresponding financial accounting records.

Report structure

The aforementioned findings summarized in this Executive Summary are explored in further detail in separate sections of this Independent Review report (hereafter the "**Report**"):

- **Section 4:** Legislature approval for printing new banknotes
- **Section 5:** Procurement and contracting of Crane AB
- **Section 6:** Shipping and delivery of new banknotes
- **Section 7:** Fund movements within the CBL

The sections above are ordered to provide a chronological timeline and account of the process to: i) obtain Legislature approval for the new banknotes, ii) procure and contract Crane AB, iii) take receipt and physically secure the new banknotes, and iv) move the new banknotes (and also legacy banknotes) into circulation.

4. Legislature approval for printing new banknotes

4.1 Introduction

The Legislature of Liberia (hereafter the “**Legislature**”) consists of the Senate (the *Upper House*), and the House of Representatives (the *Lower House*). The Senate has 30 members, with two senators serving from each of the 15 counties in Liberia. The House of Representatives contains 73 seats, with each county in Liberia being apportioned seats based on population.

The ‘*Constitution of Liberia*’ and the ‘*Act to Authorize the Establishment of the Central Bank of Liberia*’ included clauses setting out the process of approval for printing new banknotes: in summary, the Legislature ultimately has to provide approval for printing new banknotes.

4.1.1 Relevant extracts from Constitution of Liberia

The Constitution of Liberia is the supreme law of the Republic of Liberia and came into force on January 6, 1986. Subsection (ii) of Article 34(d) of the Constitution of Liberia addresses the subject of currency and stated the following [*bold emphasis added*]:

*“The Legislature shall have the power: to levy taxes, duties, imposts, excise and other revenues, to borrow money, **issue currency**, mint coins, and to make appropriations for the fiscal governance of the Republic, subject to the following qualifications:*

- (ii) *no monies shall be drawn from the treasury except in consequence of appropriations made by legislative enactment and upon warrant of the President; **and no coin shall be minted, or national currency issued except by the expressed authority of the Legislature.** An annual statement and account of the receipt and expenditure of all public monies shall be submitted by the office of the President to the Legislature and published once a year; and,*

The extract from Article 34(d) of the Constitution of Liberia “...and no coin shall be minted or national currency issued except by the expressed authority of the Legislature” clearly sets out that new banknotes cannot be “issued” by the CBL without the express authority of the Legislature.

4.1.2 Relevant extracts from Central Bank Act

The legislation governing the operations of the CBL is set out in the ‘*Act to Authorize the Establishment of the Central Bank of Liberia*’, approved October 18, 1999 (hereafter the “**Central Bank Act**”).

Part II, Section 4, Functions of the Central Bank of the Central Bank Act stated: “*The Central Bank shall have functional independence, power and authority to (1) issue legal tender banknotes and coins*”.

An amendment was made to Part II, Section 4 of the Central Bank Act on March 4, 2014 to state [*bold emphasis added*]: “Issue legal tender and banknotes and coins **upon the approval of the Legislature**”.⁹

4.2 Approval for new banknotes totaling LRD 5.0 billion

The following letters and documentation were provided to Kroll by the CBL in relation to obtaining House of Representative and Senate approval for printing new banknotes totaling LRD 5.0 billion.

4.2.1 Letter from CBL to President Sirleaf (December 23, 2015)

A letter dated December 23, 2015 from Joseph Mills Jones (hereafter “**Mills Jones**”), the then Executive Governor of the CBL to Ellen Johnson Sirleaf, the then President of Liberia (hereafter “**President Sirleaf**”) set out that the CBL was unable to meet the market demand for LRD banknotes.

Mills Jones also stated that the CBL was using USD banknotes from the CBL reserves to make direct purchases of LRD banknotes, as the LRD reserve had been “...*totally depleted*”.

4.2.2 Letter from CBL to President Sirleaf (February 19, 2016)

A letter dated February 19, 2016 from Charles Sirleaf, the then Acting Executive Governor of the CBL to President Sirleaf set out that the LRD reserve had been “...*almost depleted*” and requested urgent attention to avoid problems for the economy. The letter also set out that the LRD depletion was “...*largely on account of the revised amendments to the CBL Act of 1999, requiring the CBL to issue legal tender and banknotes upon the approval of the Legislature.*”

4.2.3 Letter from President Sirleaf to the House of Representatives (March 1, 2016)

A letter dated March 1, 2016 from President Sirleaf addressed to the Honorable Alex Tyler (hereafter “**Tyler**”), Speaker of the House of Representatives set out the following:

- The CBL had sent President Sirleaf two letters advising that the due to a lack of local currency national transactional needs may not be met.
- Printing new banknotes would require a period of “...*some five months*”.
- The underlying reason for the delay [in obtaining Legislature approval to print new banknotes] related to “...*the interpretation of Article 34(d) of the Constitution and of the Act to Authorize the Establishment of the Central Bank of Liberia as amended*”.

⁹ Note: The motion to enact the amendment was passed by the Senate on February 13, 2014 and the House of Representatives on February 18, 2014.

- The CBL was of the opinion that by the Article referenced above, the Legislature had granted implicit approval to the CBL to issue banknotes, but that the Legislature had issued a contrary view.
- The Acting Executive Governor of the CBL was seeking an opportunity to discuss the matter with Tyler and his committees.

4.2.4 Resolution #001/2016 (April 21, 2016)

A document dated April 21, 2016 detailed that ‘*Resolution #001/2016*’ was “...adopted by two-third members of the total membership of The House of Representatives and Senate of the Legislature of the Republic of Liberia authorizing the Central Bank of Liberia to print additional five billion Liberian bank notes [sic] in order to meet the demand of the Liberian economy.” The document was attested by the Honorable Mildred Sayon, as the Chief Clerk of the House of Representatives, and approved by Tyler as the Speaker.

It appeared from subsequent communications (detailed in Section 4.2.5) that whilst Resolution #001/2016 provided approval to print new banknotes totaling LRD 5.0 billion in value (not “*five billion Liberian bank notes*” as referenced in the quote), the CBL was still obliged to provide to the Senate Standing Committee on Banking & Currency details of the actual denominations of new banknotes to be printed.

The document included a caveat that the “*Central Bank of Liberia adheres to a comprehensive audit by the General Auditing Commission (GAC)*”. Kroll has not observed evidence that the General Auditing Commission has undertaken a comprehensive audit of the CBL since Resolution #001/2016 was adopted.

The appended pages to the document set out the names of 72 members¹⁰ of the House of Representatives, with signatures from 60 members approving the resolution (equivalent to 82% of the total number of members of the House of Representatives): several signatures appear to be dated *after* the date of the document (as late as June 19, 2016).

4.2.5 Letters between the Senate and the CBL (May 6, 2016 and May 9, 2016)

A letter dated May 6, 2016 from Senator Marshall Dennis (hereafter “**Dennis**”) on behalf of the Senate Standing Committee on Banking & Currency to Charles Sirleaf as the Acting Executive Governor of the CBL requested that the CBL provide the total value and the corresponding denomination of the new banknotes. The letter stated that the information was required to enable a decision to be made on the request for printing new banknotes.

¹⁰ Note: There are in law 73 seats in the House of Representatives.

In a letter dated May 9, 2016 Charles Sirleaf responded to Dennis stating that LRD 5.0 billion was required in six denominations, including LRD 500 denominated banknotes (a new currency denomination which had not previously been printed or circulated into the economy). The letter stated that the LRD 500 denominated banknotes were required to “...support high-volume transactions while at the same time fostering greater use of the Liberian dollars.” Table 3 summarizes the denominations, quantities and amounts of the new banknotes requested.

Table 3: Summary of denominations, quantity and amounts for LRD 5.0 Bn Contract

Denomination	Quantity (banknotes)	Amounts
500	2,000,000	1,000,000,000
100	26,250,000	2,625,000,000
50	20,000,000	1,000,000,000
20	10,000,000	200,000,000
10	10,000,000	100,000,000
5	15,000,000	75,000,000
Total	83,250,000	5,000,000,000

4.2.6 Senate Resolution #002 (May 17, 2016)

A document dated May 17, 2016 titled ‘Senate Resolution #002’ set out the authorization to print new banknotes totaling LRD 5.0 billion in accordance with the letter dated May 9, 2016 from Charles Sirleaf to Dennis. The document reaffirmed the denominations, quantities and amounts of the new banknotes as stated in the letter dated May 9, 2016.¹¹

Senate Resolution #002 also set out that the ‘Committee and Plenary of the Liberian Senate’ would monitor and supervise the quantity of money supply and distribution as part of monetary and fiscal measures. The document concluded by granting the request of the CBL to print new banknotes totaling LRD 5.0 billion to “...address the acute shortage of Liberian Banknotes on the market and the corresponding financial crisis associated with it that could border on the national security of the country.” The document was attested by J Nanborlor F Singbeh Sr. as the Secretary of the Senate.

The appended pages to the document set out the names of the 30 members of the Senate with signatures from 22 members approving the resolution (equivalent to 73% of the total number of members of the Senate).

¹¹ Note: Resolution #001/2016 and Senate Resolution #002 are linked documents: Resolution #001/2016 provided approval to print new banknotes, and Senate Resolution #002 provided the approval for specific quantities/denominations.

4.2.7 Letter from President Sirleaf to the CBL (July 14, 2016)

A letter dated July 14, 2016 from President Sirleaf addressed to Milton Weeks (hereafter “**Weeks**”), the then Executive Governor of the CBL set out the following:¹²

- President Sirleaf was in receipt of Resolution #001/2016 and Senate Resolution #002 authorizing the CBL to print new banknotes to address the shortage of legacy banknotes in the market.
- Approval was granted to print LRD 5.0 billion (in the denominations set out in Table 3).
- That President Sirleaf trusted the CBL to act “...*timely and appropriately*” to have the approved new banknotes printed to meet market demand.

4.2.8 CBL Press Release regarding introduction of new banknotes (October 6, 2016)

In a press release on July 27, 2016 the CBL stated that a new series of banknotes would be introduced into the Liberian economy: the total amount of new banknotes was not specified.

On October 6, 2016 a further press release was made which stated the following [*bold emphasis added*]:¹³

“The Central Bank of Liberia (CBL), Thursday, October 6, 2016, commenced the distribution and issuance of the newly printed Liberian dollar banknotes.

*The new Liberian dollar banknotes are being distributed to commercial banks and other financial institutions throughout the country to serve **customers who may wish to exchange mutilated notes for the new Liberian dollar banknotes.** The Central Bank of Liberia will commence the retrieval of mutilated bank notes from commercial banks in line with a schedule designed by the Banking Department of the CBL. The public is advised not to rush to exchange mutilated notes for new ones because the process is ongoing, without a deadline. Both the old and new denominations of Liberian Dollar banknotes will circulate simultaneously with equal monetary value.*

The Central Bank tellers’ windows for the collection of mutilated notes will continue to serve the public daily. The Central Bank is also encouraging all commercial banks to accept mutilated notes from the public and bring said notes to the CBL for deposit.

The press release indicated that the distribution and issuance of new banknotes was only to enable the exchange of mutilated legacy banknotes. Kroll was not provided with a copy of the schedule

¹² Note: Weeks was appointed as Executive Governor of the CBL on May 13, 2016.

¹³ Source: https://cbl.org.lr/2press.php?news_id=71&related=7&pg=sp

referenced in the press release setting out the approach to retrieving mutilated bank notes from commercial banks.

4.3 Approval for new banknotes totaling LRD 10.0 billion

The following letters and documentation were provided to Kroll by the CBL to evidence Legislature approval (which was ultimately not granted) for printing new banknotes totaling LRD 10.0 billion.

4.3.1 Letter from the CBL to the Liberian Senate (May 24, 2017)

A letter dated May 24, 2017 from Weeks to Senator Armah Zolu Jallah (hereafter “**Jallah**”), President Pro-Tempore of the Liberian Senate set out that:

- A presentation dated May 2, 2017 by the CBL to the ‘Honorable Senate Plenary Executive Session’ discussed the proliferation of mutilated banknotes.
- During the presentation, a proposal for the replacement of the remaining legacy banknotes was received positively: the proposal was to print new banknotes to cleanse the system of all mutilated banknotes and “*flush out*” any large holders of legacy banknotes which may be adversely impacting the CBL’s attempts at economic stabilization.
- The Senate requested a communication from the CBL outlining the cost of replacing all of the legacy banknotes with a series of “*better quality*” new banknotes.
- The process to replace the remaining legacy banknotes totaling “...*about LRD 10.0 billion Liberian dollars*” was estimated by the CBL to cost USD 10.4 million.
- The estimated cost of printing new banknotes was not factored into the CBL’s three-year budget plan; therefore the cost should be included in the national budget of the Government of Liberia.
- The banknote replacement exercise would fully address the proliferation of mutilated banknotes in the economy and would identify individuals or firms that were in the habit of hoarding large sums of legacy banknotes.

4.3.2 Letter from House of Representatives to the CBL (July 19, 2017)

A letter dated July 19, 2017 on from the House of Representatives¹⁴ to Weeks, signed by the Honorable Mildred Sayon of the House of Representatives, as the Chief Clerk and Nanborlor Singbeh Sr. as the Secretary of the Senate. The letter summarized the output from plenaries of the Senate and the House

¹⁴ Note: The July 19, 2017 letter was headed “House of Representatives”.

of Representatives respectively in discussions on the declining state of the Liberian economy, with the Legislature making the following decisions:

1. *“That the Government of Liberia should continue to use the United States Dollars and Liberian Dollars until such time when the Country’s export base has increased significantly;*
2. *That the Central Bank of Liberia is hereby requested to replace the legacy notes (Liberty) completely with the newly printed banknotes so that there will be a single type of Liberian currency, thus facilitating proper control of the money supply; and*
3. *That the Central Bank of Liberia is authorized to introduce coins in lower denomination into the economy to allow fractional transaction [sic] which could help to minimize inflation.”*

The letter further stated: *“In view of the above, and with the power assigned to the Legislature under Article 35(d) [sic] of the Constitution of the Republic of Liberia, this shall constitute your legal and sufficient authority.”*¹⁵

The letter concluded with a request that the CBL provide the Legislature with the quantity and denominations of the new banknotes *prior* to the commencement of the printing process. Kroll was not provided with documentation to demonstrate that this request was fulfilled by the CBL.

4.3.3 Letter from the CBL to President Sirleaf (July 28, 2017)

The content of an unsigned letter dated July 28, 2017 from Weeks to President Sirleaf stated the following points:

- The Legislature had requested that the CBL completely replace all legacy banknotes with new banknotes so that there would be a single type of currency and *“...thus facilitating proper control of the money supply.”*
- That a request for printing new banknotes be included in the national budget was rejected due to tight fiscal constraints, and that as an alternative the CBL should fund the cost of printing new banknotes from its reserves.
- That CBL projections on the amount of foreign currency that would be generated from a 25% conversion scheme for inward personal remittances would accrue sufficient foreign currency to be able to fund printing of the new banknotes without impacting the CBL’s reserve targets set under an International Monetary Fund Extended Credit Facility program.

¹⁵ Note: Article 35(d) stated in letter, should read Article 34(d).

4.3.4 Letter from President Sirleaf to the CBL (August 7, 2017)

The content of a signed letter dated August 7, 2017 from President Sirleaf to Weeks stated the following points:

- That President Sirleaf was in accordance with the decision of the Legislature and that she was pleased that the CBL would cover the cost of printing new banknotes.
- That in concurrence with the Legislature, details of the quantity and denominations of the new banknotes should be provided to the office of President Sirleaf (it is not known if President Sirleaf received further communications regarding the quantity and denominations of the new banknotes).

Attached to the letter provided to Kroll was a CBL Board of Governors document titled '*Resolution No. BR-06-/2017*' which set out that the Legislature, through the letter dated July 19, 2017 had provided full consent for the printing and subsequent issuance of new banknotes and the simultaneous replacement of all legacy banknotes. Resolution No. BR-06-/2017 did not set out the quantity or value of the new banknotes.

The letter also reiterated that the CBL was authorized to introduce coins in lower denominations to allow fractional transactions in an attempt to minimize inflation. The document was signed by Weeks, David Farhat, Melisa Emeh, Else Badio and Kolli Tamiba (all as Members of the CBL Board of Governors).

4.4 Conclusion

4.4.1 Approval for new banknotes totaling LRD 5.0 billion

Based on the documentation provided to Kroll, the Legislature clearly approved a CBL request to print new banknotes totaling LRD 5.0 billion to address a shortage of legacy banknotes in the Liberian economy.

The Legislature approval documentation reviewed by Kroll states that the new banknotes were to be "*infused*" into the Liberian economy, but did not clearly state whether the new banknotes were printed to i) exclusively replace mutilated legacy banknotes or ii) also be circulated directly into the economy in addition to existing legacy banknotes.

4.4.2 Approval for new banknotes totaling LRD 10.0 billion

Based on the documentation provided to Kroll, the Legislature requested that the CBL print new banknotes totaling LRD 10.0 billion, but with the strict stipulation that the CBL provide the Legislature with the quantity and denominations of the new banknotes *prior* to the commencement of the printing

process. Kroll was not provided with documentation to demonstrate that this request was fulfilled by the CBL. Therefore, based on the documentation provided to Kroll, the Legislature did not ultimately approve the CBL to print new banknotes totaling LRD 10.0 billion.

Kroll was not provided with documentation by the CBL that demonstrated how the quantity or denomination of new banknotes totaling LRD 10.0 billion was assessed as sufficient to replace the total quantity/value of legacy banknotes in circulation. According to the CBL Audited Financial Statements for the year ended December 31, 2016 the value of banknotes in circulation was LRD 13.6 billion.

Kroll was not provided with evidence that a documented strategy was formulated by the CBL to integrate new banknotes into circulation, whilst at the same time removing legacy banknotes from circulation (for example, how the CBL would identify individuals or firms that were “...*hoarding large sums of legacy banknotes*” as referenced in the letter from the CBL to the Liberian Senate on May 24, 2017).

Finally, the CBL confirmed to Kroll that no coins were introduced into the economy to minimize inflation (per the letter from the House of Representatives to the CBL dated July 19, 2017). In contrast, the CBL ordered 5,740,000 new LRD 500 denominated banknotes totaling LRD 2,870,000,000 (USD 25,588,445).

5. Procurement and contracting of Crane AB

5.1 Introduction

On April 29, 2016 Charles Sirleaf, the then Acting Executive Governor of the CBL, sent a letter to a Crane AB Representative titled “*Subject: Award of Procurement Contract*”.

The letter set out that, in response to proposals made by Crane AB and two other companies, the CBL had awarded Crane AB a procurement contract “...for the printing of our Liberian Dollar banknotes as most Responsive Selective Bidder”. The letter also stated that Crane AB was awarded the procurement contract as the company had offered the best price and terms and conditions of payment, and for ensuring that “...we [the CBL] meet our target date for the printing and delivery of at least one fifth (1/5) of the total production by July 15, 2016.”

The CBL subsequently entered into two contracts with Crane AB:

1. **May 6, 2016:** contract for printing of new banknotes totaling LRD 5.0 billion; and,
2. **June 12, 2017:** contract for printing of new banknotes totaling LRD 10.0 billion.

5.2 Procurement of Crane AB

5.2.1 Relevant legislation and policies

The Public Procurement and Concessions Act of 2005 enabled the formation of a Public Procurement and Concessions Commission with oversight for all public procurement and concessions in Liberia to ensure that public procurement is conducted in a fair and transparent manner.

Part I of the Public Procurement and Concessions Act of 2005 stated that the scope and application of the legislation would not apply to: “*Agreements executed by the Central Bank of Liberia relating to the implementation of monetary policy or procurement related to the production of coins or currency.*”

Despite there being no legal requirement for the CBL to observe the provisions of the Public Procurement and Concessions Act of 2005, the CBL had its own internal policies setting out how to procure goods and services.

The CBL Procurement Policy applies to the procuring of services to print new banknotes and has therefore formed the basis of Kroll’s review. The CBL Procurement Policy provided to Kroll was not dated or signed, however, CBL Management advised Kroll that this policy was applicable at the time of the procurement and contracting of Crane AB.

5.2.2 Procurement File for Crane AB

During the onsite visit in December 2018, Kroll was provided with the procurement file for Crane AB. The procurement file contained the following documentation:

- Letters from the CBL to President Sirleaf in relation to the receipt of Legislature approval for printing new banknotes (refer to Section 4).
- Email correspondence between various CBL and Crane AB representatives.¹⁶
- A letter of proposal from Crane AB, dated April 25, 2016.

The CBL Procurement Policy set out guidance for tendering, evaluating and selecting a new vendor. Section 3 to Section 50 of the policy prescribe the procedures to be followed when procuring goods and services - these sections are summarized in the following sub-sections:

5.2.2.1 Procurement Policy: Pre-bidding procedures

- **Section 3 to Section 6** referred to the establishment of a Procurement Committee and Procurement Unit. Section 3(i) stated that the Procurement Committee “...shall be chaired by the Executive Governor. Other standing members of the procurement Committee shall be the Deputy Governor, the Director of Administration and the Director of Finance.”
- **Section 5(a)** stated that “...a separate, functional unit, reporting directly to the Director of Administration” would be established.
- **Section 5(b)** stated that “...the Procurement Unit of not less than two (2) who shall be charged with the responsibility of budgeting, expenditure, and the administration of all procurement of the Bank.”
- **Section 7 to 13** outlined the process for reviewing potential bidders and the administration of bids.
- **Section 14 to 16** outlined the planning process to be undertaken by the Procurement Unit in accordance with the CBL’s budget.
- **Section 17** of the Procurement Policy stated that “...all contracts shall be monitored by the General Services Section (GSS) in collaboration with Internal Audit”.

Kroll was not provided with evidence that any of the aforementioned criteria was observed by the CBL for the procurement of Crane AB for either the first or second contract.

¹⁶ Note: Kroll was provided with hard copies of emails, the authenticity of these communications cannot be verified.

5.2.2.2 Procurement Policy: Bidding and post-bidding procedures

CBL Management stated that the procurement of Crane AB was classified under ‘*Section 27: Restricted bidding*’, whereby “...*the goods, works or services are only available from a limited number of bidders.*” The following criteria was set out for ‘*Restricted bidding*’:

- **Section 29:** The CBL should solicit a minimum of five bidders if possible, and under the ‘*Request for proposal*’ method, quotations should be requested from at least three candidates. The CBL should outline the requirements, in terms of quality, quantity and delivery time, and the selection should be based on cost and ability to meet the CBL requirements.
- **Section 37:** An invitation to bid “...*shall be published in the procurement gazette, notional print media of wide circulation and electronic media, when feasible, and in the case of international competitive bidding, also in selective international media.*”
- **Section 39:** Bidding documents should be prepared by the Procurement Unit outlining specific requirements of the tender.
- **Section 40:** Bids should be submitted in writing and duly signed in a sealed envelope.
- **Section 45:** No negotiations should take place with a supplier without the authorization of the Procurement Committee.

Kroll has not seen evidence of the CBL adhering to any of the aforementioned requirements outlined in the Procurement Policy.

Kroll was informed by CBL Management that two international currency printing companies also submitted proposals to the CBL for consideration: aside from limited email correspondence with the two international currency printing companies no further information was available to demonstrate that either company had any opportunity to submit a formal proposal for services, or that either company had declined the opportunity.

Kroll was not provided with documentation to demonstrate that any due diligence of Crane AB was undertaken by the CBL prior to entering into either contract.

5.2.3 Summary of email correspondence between CBL and Crane AB

Kroll reviewed several emails which provided background to the relationship between the CBL and Crane AB. The relationship between the CBL and Crane AB was established through personal email introductions.

Weeks was introduced to a senior member of Crane Currency based in their Boston office through a personal introduction from a commercial banking contact,

After the initial introduction between the CBL and Crane Currency, a meeting was organized in Washington DC on April 17, 2016 between Charles Sirleaf and a Sales Director at Crane Currency. Charles Sirleaf, together with the Honorable Amara Konneh, the then Minister of Finance and Development Planning, were reportedly in Washington DC attending meetings at the International Monetary Fund and the World Bank.

The meeting between the CBL and Crane AB in Washington DC on April 17, 2016 was prior to the House of Representatives and Senate approval of Resolution #001/2016 dated April 21, 2016.

5.2.4 Board of Governors Resolution (April 28, 2016)

A Board of Governors Resolution (reference BR-08/2016) dated April 28, 2016 confirmed the selection of Crane AB as the vendor selected to print new banknotes. The Resolution stated that a detailed presentation was made by three banknote manufacturers: Crane AB, and two other international currency printing companies.

The Resolution was approved at a ‘*Special Called Meeting*’ on April 28, 2016. The corresponding signed minutes of the Special Called Meeting do not mention the detailed presentations, nor do the minutes reference a banknote printing contract with Crane AB. The Resolution was signed by David Farhat, Acting Chairman of the Board of Governors; Melisa Emeh, Member of the Board of Governors; Weeks, as a Member of the Board of Governors and Charles Sirleaf, as the then Acting Executive Governor.

5.2.5 Award of the procurement contract to Crane AB (April 29, 2016)

Kroll reviewed a CBL letter dated April 29, 2016 titled ‘*Subject: Award of Contract.*’ The letter stated:¹⁷

“Based on presentation of proposals by you and two other companies made to the Management of the Central Bank of Liberia (CBL) and the Minister of Finance and Development Planning, and pursuant to our review and analysis, the Management of the CBL is pleased to award you the procurement contract for the printing of our Liberian Dollar banknotes.”

The letter referenced other proposals presented to the CBL by two international currency printing companies. Kroll requested copies of these proposals but no documentation was provided by the CBL.

The CBL only provided one ‘proposal’ which was a letter dated April 25, 2016 from Crane AB to Charles Sirleaf setting out details of the company’s understanding of the CBL requirements and a proposed

¹⁷ Note: Letter reference CBL/A-E GOV/CES/0000218/2016.

response to print new banknotes totaling LRD 5.0 billion. The letter made no reference to responding to a 'Request for proposal' per the CBL Procurement Policy criteria summarized at Section 5.2.2.2.

5.2.6 Board of Governors Special Meeting (May 13, 2016)

Minutes from the Board of Governors Special Meeting dated May 13, 2016 included the following extract:

“AG Sirleaf briefed the Board on the status of the proposed printing of new bank notes. AG Sirleaf said, the CBL originally met with [REDACTED] and expressed the urgency and need for printing. According to Mr. Sirleaf, [REDACTED] declined CBL's offer and cited capacity issues of their plant.

DG [sic] Sirleaf also said, while in Washington DC, he met with 2 other printing companies, [REDACTED] and Crane. Mr. Sirleaf said [REDACTED] charged US\$7.5 million and wanted 100 percent down payments to print the L\$5.0 billion. The Acting Governor said, the Company informed him that they could not make available the L\$1.0 billion urgently needed by the CBL in July, 2016.

As for Crane. AG Sirleaf said, the company charged [REDACTED] for the printing of the same L\$5.0 billion and is willing to take installment payments. According to him, Crane is willing to make available the L\$1.0 billion by July, 2016.”

The Minutes from the Board of Governors Special Meeting dated May 13, 2016 reference that Charles Sirleaf met (either individually or with the Minister of Finance and Development Planning) with each of the three potential vendors.

5.3 Contract between CBL and Crane AB dated May 6, 2016

5.3.1 Summary of contract

On May 6, 2016 the CBL signed a contract with Crane AB for the printing of new banknotes totaling LRD 5.0 billion (hereafter the “**LRD 5.0 Bn Contract**”).

The LRD 5.0 Bn Contract was signed by Charles Sirleaf on behalf of the CBL, and by a Crane AB Representative . The LRD 5.0 Bn Contract was witnessed by a secretary for the CBL and appeared to be initialed on each page by Charles Sirleaf. The LRD 5.0 Bn Contract was subsequently notarized on May 10, 2016 by a Liberian Notary Public.

Kroll identified that there was a discrepancy in the timing of the signing of the contract between the CBL and Crane AB for printing new banknotes totaling LRD 5.0 billion (May 6, 2016) and the final Senate approval (Senate Resolution #002) for printing new banknotes totaling LRD 5.0 billion (May 17,

2016): this eleven day variance between the contract signing date and the final Senate approval date indicated that the LRD 5.0 Bn Contract was agreed prior to final Senate approval.

For clarity, Resolution #001/2016 (which was approved by the House of Representatives and the Senate on April 21, 2016) was the approval to print new banknotes totaling LRD 5.0 billion *subject to* the CBL providing further details of the denominations, quantity and amounts of the order to the Senate. Senate Resolution #002 was approved by the Senate on May 17, 2016 and provided the supplementary approval for the denominations, quantity and amounts of the order.

5.3.2 Summary of terms and conditions

The key terms and conditions of the LRD 5.0 Bn Contract, included as various ‘Articles’, are summarized in the following paragraphs.

Article I: Banknote Production and Prices set out that the designs, specifications and prices of the new banknotes were per Appendix A and Appendix B of the LRD 5.0 Bn Contract.

Article I also stated that the agreement included delivery to the Freeport of Monrovia only, and that additional air freight fees would be charged at cost in addition to and separately from the prices quoted in Appendix B of the LRD 5.0 Bn Contract.

Article II: Quantities and Denominations set out the denomination and respective quantities of the order per Appendix B of the LRD 5.0 Bn Contract.

Article II also stated that the LRD 5.0 Bn Contract allowed for a +/- 1.5% fluctuation in the actual quantity of banknotes to be printed due to the practicalities of banknote printing, and that the CBL and Crane AB would treat such instances by mutual consent through the establishing of side letters.

Article VI: Payment set out that the CBL would make a down payment equivalent to the contract price at the time of signature, and that the balance would be settled pro rata against shipping documentation or air waybills prior to each delivery per Appendix D of the LRD 5.0 Bn Contract.

Article XIV: Shipment set out that *“The Company [Crane AB] shall arrange freight dispatches on behalf of the [Central] Bank, acting as its agent. Once arrangements are in place, the Company undertakes to send to the Bank a Notification of Shipment by electronic mail (email) not more than forty eight (48) hours after completion of loading aboard vessel or seventy-two (72) hours before flight date of each assignment.”*

Appendix A: Technical Specifications summarized the composition of the new banknotes, including size, paper quality, print, ink, signatures, watermark and numbering (this information has not been reproduced in this Report).

Appendix B: Quantities and Prices summarized the quantities and prices of the new banknotes (refer to Section 5.3.3).

Appendix C: Delivery Schedule with Key Milestones summarized the estimated delivery schedule for each denomination of banknote (refer to Section 5.3.4).

Appendix D: Payment Schedule summarized the planned amounts and dates for payment of the printed banknotes (refer to Section 5.3.5).

5.3.3 Summary of contractual quantities and actual quantities printed

Appendix B: Quantities and Prices to the LRD 5.0 Bn Contract set out the denomination, quantity, unit price (in USD) and total price (in USD) of the banknotes: this information is reproduced in Table 4.

Table 4: Summary of denominations, quantity and amounts for LRD 5.0 Bn Contract

Denomination	Quantity (banknotes)	Unit price (per 1000)	USD price total	LRD banknote value total ¹⁸
500	2,000,000	██████████	██████████	1,000,000,000
100	26,250,000	██████████	██████████	2,625,000,000
50	20,000,000	██████████	██████████	1,000,000,000
20	10,000,000	██████████	██████████	200,000,000
10	10,000,000	██████████	██████████	100,000,000
5	15,000,000	██████████	██████████	75,000,000
Total	83,250,000	██████████	██████████	5,000,000,000

5.3.3.1 Variances calculated by quantity of banknotes

Kroll's analysis of documentation provided by the CBL and Crane AB showed that a greater quantity of new banknotes were printed by Crane AB than the agreed contractual amount.

In total 87,500,000 new banknotes were printed, compared to a contractual total of 83,250,000 new banknotes, an increase of 4,250,000 new banknotes: this information is summarized in Table 5.

Table 5: Summary of contract quantity vs. actual quantity of banknotes printed under LRD 5.0 Bn Contract

Denomination	Contract quantity (banknotes)	Actual quantity (banknotes)	Difference (banknotes)	Difference (%)
500	2,000,000	2,050,000	50,000	2.50
100	26,250,000	26,650,000	400,000	1.52
50	20,000,000	21,000,000	1,000,000	5.00

¹⁸ Note: 'LRD banknote value total' column added by Kroll to illustrate total LRD value of contract vs. USD price total.

Denomination	Contract quantity (banknotes)	Actual quantity (banknotes)	Difference (banknotes)	Difference (%)
20	10,000,000	10,900,000	900,000	9.00
10	10,000,000	10,750,000	750,000	7.50
5	15,000,000	16,150,000	1,150,000	7.67
Total	83,250,000	87,500,000	4,250,000	5.11

Article II: Quantities and Denominations of the LRD 5.0 Bn Contract stated that the agreement allowed for +/- 1.5% fluctuation in the actual quantity of banknotes to be printed due to the practicalities of banknote printing, and that the CBL and Crane AB would treat such instances by mutual consent through the establishing of side letters.

The analysis illustrates that the fluctuation in the actual quantity of banknotes printed was greater than the contractual allowance of +1.5% for each denomination, and 5.11% overall. Kroll was not provided with side letters by Crane AB or the CBL to show that the fluctuation in the actual quantity of banknotes printed had been mutually agreed.

5.3.3.2 Variances calculated by value of banknotes

In total new banknotes totaling LRD 5,146,250,000 (USD 45,663,113) were printed by Crane AB in respect of the LRD 5.0 Bn Contract: this represented the over-printing of banknotes totaling LRD 146,250,000 (USD 1,303,941) compared to the agreed contractual value.

Table 6 summarizes the contracted value of new banknotes compared to the actual value of new banknotes.

Table 6: Summary of contract value vs. actual value of banknotes printed under LRD 5.0 Bn Contract

Denomination	Contract value (LRD)	Actual value (LRD)	Difference (LRD)	Difference (%)
500	1,000,000,000	1,025,000,000	25,000,000	2.50
100	2,625,000,000	2,665,000,000	40,000,000	1.52
50	1,000,000,000	1,050,000,000	50,000,000	5.00
20	200,000,000	218,000,000	18,000,000	9.00
10	100,000,000	107,500,000	7,500,000	7.50
5	75,000,000	80,750,000	5,750,000	7.67
Total	5,000,000,000	5,146,250,000	146,250,000	2.93

5.3.4 Summary of contractual delivery schedule and actual delivery schedule

Appendix C: Delivery Schedule with Key Milestones set out the order award date, proof approval date, start of production date and delivery date for each denomination of banknote.

In a letter dated April 29, 2016 sent by Charles Sirleaf to a Crane AB Representative (refer to Section 5.1) it was stated that Crane AB was awarded the procurement contract as the company had ensured that “...we [the CBL] meet our target date for the printing and delivery of at least one fifth (1/5) of the total production by July 15, 2016.”

The requirement to fulfil the delivery of at least one-fifth of the total production by July 15, 2016 was not enclosed in the contract between the CBL and Crane AB. Whilst Crane AB did not fulfil the delivery of at least one fifth of the total production by July 15, 2016, the criteria was met by July 24, 2016.

The date of delivery for the final shipment of new banknotes for the LRD 5.0 Bn Contract was estimated to be December 31, 2016: all shipments were documented as having been delivered to the CBL by this date.

5.3.5 Summary of contractual payment schedule and actual payment schedule

Appendix D: Payment Schedule set out the contractual dates and amounts of the payments for printing new banknotes: this information is reproduced in Table 7.

Table 7: Summary of contractual payment schedule for LRD 5.0 Bn Contract

Payment description	Due date	Amount (USD)
40% down payment	May 6, 2016	██████████
First installment	July 25, 2016	██████████
Balance	September 15, 2016	██████████
Total		██████████

Kroll reviewed documentation provided by the CBL and Crane AB detailing the amounts and dates of payments in respect of the LRD 5.0 Bn Contract: this information is summarized in Table 8.

Table 8: Summary of actual payment schedule for LRD 5.0 Bn Contract

Payment description	Payment date	Amount (USD)
40% down payment	May 9, 2016	██████████
First instalment	June 27, 2016	██████████
Air freight payment (not in contract)	July 19, 2016	██████████
Air freight (not in contract)	September 16, 2016	██████████
Balance	December 5, 2016	██████████
Total		██████████

5.3.5.1 Payments in respect of printing new banknotes

Documentation provided by the CBL showed that payments made to Crane AB were made via an account held with the Federal Reserve Bank of New York.

The analysis has not identified any discrepancies between the contractual payment amounts and the actual payment amounts for printing new banknotes.

Discrepancies in the contractual payment dates were identified, specifically that the first installment was paid by the CBL 28 days earlier than the contractual date.

5.3.5.2 Payments in respect of air freight

The LRD 5.0 Bn Contract specified that additional fees would be payable in respect of banknotes delivered by air freight. Kroll was provided with documentation by both the CBL and Crane AB for payments in respect of air freight.

The documentation provided for payments in respect of air freight did not include the original invoice from the respective airline, therefore the cost of the transport cannot be fully analyzed in terms of accuracy. Further, it was not possible to confirm if the following transactions represented all payments in respect of air freight:

July 19, 2016 (payment for USD [REDACTED])

- A CBL authorization form described the payment as: *“Transfer payment represents the cost of Air Freight for printed materials shipped through Bank of Ghana as per invoice #042271.”*

September 16, 2016 (payment for USD [REDACTED])

- The documentation provided to Kroll detailed a payment to the Bank of Ghana on or around September 16, 2016. The payment of [REDACTED] was for the cost of *“...insurance premium and handling of valuable cargo on behalf of the Central Bank of Liberia...”*
- The payment was made in respect of air waybill 176-2445-3000, which matched the Kenya Airlines air waybill number for the first delivery of new banknotes to Liberia on July 14, 2016.

5.3.5.3 Payments in respect of over-printing

The payment made by the CBL to Crane AB on December 5, 2016 for [REDACTED] was in respect of i) the balance owed for printing new banknotes ([REDACTED]), and ii) a payment for the over-printing of new banknotes ([REDACTED]).

The payment for the over-printing of 4,250,000 new banknotes for the first contract (corresponding to new banknotes totaling LRD 146,250,000) was calculated based on the contractual rate for the original

order (i.e., ██████ per banknote).¹⁹ It was not clear whether CBL Board of Governors or Legislature approval was required for the additional payment made by the CBL to Crane AB.

5.4 Contract between CBL and Crane AB dated June 12, 2017

5.4.1 Summary of contract

On June 12, 2017 the CBL signed a contract with Crane AB for the printing of new banknotes totaling LRD 10.0 billion (hereafter the “**LRD 10.0 Bn Contract**”).

The LRD 10.0 Bn Contract was signed by Weeks on behalf of the CBL, and by a Crane AB Representative. The LRD 10.0 Bn Contract was witnessed by an Assistant Solicitor on behalf of Crane AB. The LRD 10.0 Bn Contract was subsequently notarized on July 28, 2017 by a Liberian Notary Public.

Kroll identified that the contract between the CBL and Crane AB dated June 12, 2017 to print new banknotes totaling LRD 10.0 billion was signed four weeks prior to a letter dated July 19, 2017 sent by the Legislature to the CBL requesting that all legacy banknotes in the Liberian economy be replaced with new banknotes: this represented a four-week variance between the contract signing date and letter of request date. The letter dated July 19, 2017 included a caveat that the CBL provide the Legislature with details of the quantity and denominations of the new banknotes “...*prior to the printing*” of the new banknotes - no documentation was provided to Kroll to evidence that the CBL had provided the Legislature with details of the quantity and denominations of the new banknotes.

5.4.2 Summary of terms and conditions

The key terms and conditions of the LRD 10.0 Bn Contract, included as various ‘*Articles*’, are summarized in the following paragraphs.

Article I: Banknote Production and Prices set out that the designs, specifications and prices of the new banknotes were per Appendix A and Appendix B of the LRD 10.0 Bn Contract.

Article I also stated that the agreement included delivery to the Freeport of Monrovia only, and that additional air freight charges would be charged at cost in addition to and separately from the prices quoted in Appendix B of the LRD 10.0 Bn Contract.

Article II: Quantities and Denominations set out the denomination and respective quantities of the order placed per Appendix B of the LRD 10.0 Bn Contract.

¹⁹ Note: 4,250,000 banknotes multiplied by ██████ equals ██████.

In contrast to the LRD 5.0 Bn Contract, Article II did not state that the LRD 10.0 Bn Contract allowed for +/- 1.5% fluctuation in the actual quantity of banknotes to be printed due to the practicalities of banknote printing.

Article VI: Payment set out that the CBL would make a down payment equivalent to the total contract price at the time of signature, and that the balance would be settled pro-rata against shipping documentation or air waybills prior to each delivery per Appendix D of the LRD 10.0 Bn Contract.

Article XIV: Shipment set out that *“The Company [Crane AB] shall arrange freight dispatches on behalf of the [Central] Bank, acting as its agent. Once arrangements are in place, the Company undertakes to send to the Bank a Notification of Shipment by electronic mail (email) not more than forty eight (48) hours after completion of loading aboard vessel or seventy-two (72) hours before flight date of each assignment.”*

Appendix A: Technical Specifications summarized the composition of the new banknotes, including size, paper quality, print, ink, signatures, watermark and numbering (this information has not been reproduced in this Report).

Appendix B: Quantities and Prices summarized the quantities and prices of the new banknotes (refer to Section 5.4.3).

Appendix C: Delivery Schedule with Key Milestones summarized the estimated delivery schedule for each denomination of banknote (refer to Section 5.4.4).

Appendix D: Payment Schedule summarized the planned amounts and dates for payment of the printed banknotes (refer to Section 5.4.5).

5.4.3 Summary of contractual quantities and actual quantities delivered

Appendix B: Quantities and Prices to the LRD 10.0 Bn Contract set out the denomination, quantity, unit price (in USD) and total price (in USD) of the banknotes: this information is reproduced in Table 9.

Table 9: Summary of denominations, quantity and amounts for LRD 10.0 Bn Contract

Denomination	Quantity (banknotes)	Unit price (per 1000)	USD price total	LRD banknote value total ²⁰
500	5,740,000	██████████	██████████	2,870,000,000
100	50,000,000	██████████	██████████	5,000,000,000
50	15,000,000	██████████	██████████	750,000,000
20	50,000,000	██████████	██████████	1,000,000,000

²⁰ Note: ‘LRD banknote value total’ column added by Kroll to illustrate the total LRD value of contract vs. USD price total.

Denomination	Quantity (banknotes)	Unit price (per 1000)	USD price total	LRD banknote value total ²⁰
10	35,000,000			350,000,000
5	6,000,000			30,000,000
Total	161,740,000			10,000,000,000

5.4.3.1 Variances calculated by quantity of banknotes

Kroll's analysis of documentation provided by the CBL and Crane AB showed that a greater quantity of new banknotes were printed by Crane AB for the CBL than the agreed contractual amount.

In total 163,720,000 new banknotes were printed, compared to a contractual total of 161,740,000 new banknotes, an increase of 1,980,000 new banknotes: this information is summarized in Table 10.

Table 10: Summary of contract quantity vs. actual quantity of banknotes printed under LRD 10.0 Bn Contract

Denomination	Contract quantity (banknotes)	Actual quantity (banknotes)	Difference (banknotes)	Difference (%)
500	5,740,000	6,150,000	410,000	7.14
100	50,000,000	51,500,000	1,500,000	3.00
50	15,000,000	15,320,000	320,000	2.13
20	50,000,000	49,250,000	-750,000	-1.50
10	35,000,000	35,250,000	250,000	0.71
5	6,000,000	6,250,000	250,000	4.17
Total	161,740,000	163,720,000	1,980,000	1.22

Kroll was not provided with any documentation by Crane AB or the CBL to demonstrate that the fluctuation in the actual quantity of banknotes printed had been mutually agreed.

5.4.3.2 Variances calculated by value of banknotes

In total, new banknotes totaling LRD 10,359,750,000 (USD 92,365,817) were printed by Crane AB in respect of the LRD 10.0 Bn Contract: this represented the over-printing of banknotes totaling LRD 359,750,000 (USD 2,921,070) compared to the agreed contractual amount.

Table 11 summarizes the contracted value of new banknotes compared to the actual value of new banknotes printed.

Table 11: Summary of contract value vs. actual value of banknotes printed under LRD 10.0 Bn Contract

Denomination	Contract value (LRD)	Actual value (LRD)	Difference (LRD)	Difference (%)
500	2,870,000,000	3,075,000,000	205,000,000	7.14
100	5,000,000,000	5,150,000,000	150,000,000	3.00
50	750,000,000	766,000,000	16,000,000	2.13
20	1,000,000,000	985,000,000	-15,000,000	-1.50
10	350,000,000	352,500,000	2,500,000	0.71
5	30,000,000	31,250,000	1,250,000	4.17
Total	10,000,000,000	10,359,750,000	359,750,000	3.60

5.4.4 Summary of contractual delivery schedule and actual delivery schedule

Appendix C: Delivery Schedule with Key Milestones set out the order award date, proof approval date, start of production date and delivery date for each denomination of banknote.

The date of delivery for the final shipment of new banknotes for the LRD 10.0 Bn Contract was estimated to be January 26, 2018: the final shipment was not delivered to Liberia until March 28, 2018.

5.4.5 Summary of contractual payment schedule and actual payment schedule

Appendix D: Payment Schedule set out the contractual dates and amounts of the payments for printing new banknotes: this information is reproduced in Table 12.

Table 12: Summary of contractual payment schedule for LRD 10.0 Bn Contract

Payment	Due date	Amount (USD)
40% down payment	On contract signing	██████████
First installment	On first delivery	██████████
Balance	One month after final delivery	██████████
Total		██████████

Kroll reviewed documentation provided by the CBL and Crane AB detailing the amounts and dates of payments in respect of the LRD 10.0 Bn Contract: this information is summarized in Table 13.

Table 13: Summary of actual payment schedule for LRD 10.0 Bn Contract

Description	Payment date	Amount (USD)
40% down payment	August 11, 2017	██████████
Air freight (not in contract)	October 23, 2017	██████████
First instalment	October 31, 2017	██████████
Balance	March 1, 2018	██████████
Additional payment	March 8, 2018	██████████
Air freight (not in contract)	March 14, 2018	██████████
Total		██████████

5.4.5.1 Payments in respect of printing new banknotes

Documentation provided by the CBL showed that payments made to Crane AB were made via an account held with the Federal Reserve Bank of New York.

The final balance was due to be paid by the CBL to Crane AB one month after the final delivery of the new banknotes, which was documented as March 28, 2018. The final payment was made four weeks prior to the final delivery on March 1, 2018.

5.4.5.2 Payments in respect of air freight

The LRD 10.0 Bn Contract specified that additional fees would be payable in respect of banknotes delivered by air freight.

Kroll was provided with documentation by both the CBL and Crane AB for payments in respect of air freight - it was not possible to confirm if the information provided represented all payments for air freight:

October 23, 2017 (payment for ██████████)

- The Crane AB invoice stated that the fees related to air freight delivered on October 20, 2017 and October 22, 2017.

March 1, 2018 (payment for ██████████)

- The air freight fees were included in the payment for ██████████ in respect of the final balance of ██████████. A CBL authorization form described the payment as: *“Payment represents air freight cost for delivery of 15 million of Liberia 50 and 5.74 million of Liberia 500 in December 2017 and balance payment on contract. Translation rate.”*²¹

²¹ Note: The CBL document records air freight fees of ██████████, equivalent to ██████████ at EUR 1:USD 1.221400.

March 14, 2018 (payment for [REDACTED])

- The Crane AB invoice stated that the fees related the “*Cost of delivery of 2.73 mBn [sic] Liberian banknotes ... in March 2018*”.²²

5.4.5.3 Payments in respect of over-printing

A payment in March 2018 was made by the CBL to Crane AB for [REDACTED] for the over-printing of 2,730,000 new banknotes under the LRD 10.0 Bn Contract (corresponding to new banknotes totaling LRD 359,750,000). A CBL authorization form described the payment as: “*Payment represents additional cost to ship printed materials on behave [sic] of Central Bank of Liberia.*” The CBL stated to Kroll that the payment was in respect of over-printing, not the actual shipping cost.

The payment for the over-printing of new banknotes for the LRD 10.0 Bn Contract was calculated without deducting the cost of 750,000 new LRD 20 denominated banknotes which were not delivered to the CBL (contracted quantity 50,000,000 banknotes, actual quantity 49,250,000 banknotes).²³

The cost of printing 750,000 banknotes at the contractual rate (i.e., [REDACTED] per banknote) was [REDACTED]: this amount therefore represented an over-payment by the CBL to Crane AB.²⁴

5.5 Evaluation of contract price

5.5.1 Reasonableness of contract price

In order to evaluate the reasonableness of the costs for the two contracts between the CBL and Crane AB, Kroll considered the contract price in comparison to i) other competing bids for the two banknote printing contracts; ii) previous banknote printing contracts for the CBL and iii) open source information available for equivalent contracts.

The procurement file did not include full proposals from Crane AB or other two international currency printing companies: therefore, it was not possible to complete a meaningful analysis of competing bids.

Kroll was informed by the CBL that prior to the Crane AB contracts, the previous banknote printing contract was entered into with [REDACTED] in 2011. Kroll requested copies of the contract between the CBL and [REDACTED]: no documentation was provided by the CBL, therefore it was not possible to undertake a comparison of prices between the previous [REDACTED] contract and the Crane AB contract.

²² Note: The Crane AB invoice records air freight fees of [REDACTED], equivalent to [REDACTED] at EUR 1:USD 1.23596.

²³ Note: LRD 20 denominated banknotes were underdelivered by 1.5%, refer to Table 11.

²⁴ Note: 750,000 banknotes multiplied by [REDACTED] equals [REDACTED].

The availability of open source information for equivalent contracts was limited, due to the confidentiality of pricing information available from banknote manufacturers. The U.S. Federal Reserve website provided details of the printing costs for each denomination of USD banknote, which range from US 5.5 cents for a USD 1 banknote, to US 14.2 cents for a USD 100 banknote. Therefore the Crane AB cost of [REDACTED] per banknote was within this range.

5.6 Conclusion

5.6.1 Procurement of Crane AB

Kroll was not provided with adequate supporting documentation to demonstrate that the CBL adhered to its internal tendering policies for the procurement of the external banknote manufacturer Crane AB.

Kroll was informed by the CBL that two international currency printing companies also submitted proposals for consideration: aside from limited email correspondence with these two firms, no further information was provided to Kroll to demonstrate that either company had an opportunity to submit a formal proposal for services.

The CBL file for the procurement of a banknote manufacturer did not include any communications or proposals other than a Crane AB letter setting out a proposed approach to meeting the CBL's requirements, and no evidence was included to demonstrate the consideration or analysis of other tender submissions.

5.6.2 Contract between CBL and Crane AB dated May 6, 2016

The contract between the CBL and Crane AB dated May 6, 2016 to print new banknotes totaling LRD 5.0 billion was agreed eleven days prior to the CBL receiving final approval through Senate Resolution #002 dated May 17, 2016 to print new banknotes totaling LRD 5.0 billion.

The LRD 5.0 Bn Contract included a clause that permitted a fluctuation in the actual quantity of banknotes printed of +/-1.5% for each denomination, subject to side letters being mutually agreed between the CBL and Crane AB. Ultimately, a total of 4,250,000 additional banknotes were printed, valued at LRD 146,250,000 (USD 1,303,941) which represented a 5.1% overprinting compared to the contractual quantity of banknotes to be printed.

Kroll was not provided with side letters to show that the overprinting in the actual quantity of banknotes had been mutually agreed between the CBL and Crane AB.

5.6.3 Contract between CBL and Crane AB dated June 12, 2017

The contract between the CBL and Crane AB dated June 12, 2017 to print new banknotes totaling LRD 10.0 billion was agreed four weeks prior to the CBL receiving a letter dated July 19, 2017 sent by the Legislature requesting that the CBL replace all legacy banknotes in the Liberian economy with new banknotes.

The LRD 10.0 Bn Contract did not include a clause that permitted a fluctuation in the actual quantity of banknotes printed. Ultimately, a total of 1,980,000 additional banknotes were printed, valued at LRD 359,750,000 (USD 3,207,471) which represented a 1.2% overprinting compared to the contractual quantity of banknotes to be printed.

Kroll was not provided with documentation to show that the fluctuation in the actual quantity of banknotes printed had been mutually agreed between the CBL and Crane AB.

6. Shipping and delivery of new banknotes

6.1 Introduction

The mandate for Kroll's Independent Review was prompted by Liberian and international media reports covering the alleged disappearance of new banknotes. Kroll considered the content of relevant media reports, which included allegations that a container of banknotes was missing, to inform the approach to reviewing the available documentation for the shipping and delivery of the new banknotes.

Kroll obtained documentation from the CBL, Crane AB and APC Logistics (a freight forwarder for Crane AB). Separate requests for information to JVS Incorporated Inc. (the customs agent for the CBL in Liberia) were not answered.

6.2 Shipping of new Liberian Dollar banknotes

6.2.1 Summary of shipping documentation provided by Crane AB

Kroll reviewed documentation provided by Crane AB and APC Logistics to verify the shipping of new banknotes from Sweden to Liberia between July 2016 and March 2018. The documentation reviewed included: Crane AB invoices, Crane AB packing lists, supplementary shipping documents from APC Logistics and the corresponding bills of lading or air waybills.

The Crane AB invoices outlined the sales order quantity and the banknote denomination, the Crane AB packing lists detailed the number of pallets and the total gross weight of the shipments, and the bills of lading or air waybills set out the number of pallets and the total gross weight.²⁵

Based on the documentation provided to Kroll, there were six shipments made by Crane AB to the CBL in relation to the LRD 5.0 Bn Contract (two shipments by air and four shipments by sea). The shipments were made between 14 July 2016 and 22 December 2016.

A summary of shipments for the LRD 5.0 Bn Contract is provided at Appendix A.

Based on the documentation provided to Kroll, there were fourteen shipments made by Crane AB to the CBL in relation to the LRD 10.0 Bn Contract (seven shipments by air and seven shipments by sea). The shipments were made between 20 October 2017 and 28 March 2018.

A summary of shipments for the LRD 10.0 Bn Contract is provided at Appendix B.

²⁵ Note: Wooden 'pallets' are used to transport up to 25 wooden boxes of banknotes by sea freight or airfreight.

The documentation provided by Crane AB showed a total of LRD 15.506 billion as being shipped to Liberia between July 2016 to March 2018:

- LRD 5,146,250,000 (USD 45,883,113) was documented as being shipped by Crane AB to Liberia in respect of the LRD 5.0 Bn Contract.
- LRD 10,359,750,000 (USD 92,365,817) was documented as being shipped by Crane AB to Liberia in respect of the LRD 10.0 Bn Contract.

Kroll's analysis identified potential discrepancies in two shipments, which are explored in further detail in Section 6.4.

6.3 Delivery of new Liberian Dollar banknotes

6.3.1 Summary of delivery documentation provided by the CBL

The CBL Internal Audit Department explained to Kroll that Crane AB would notify the CBL in advance of each shipment of new banknotes scheduled for delivery to the Freeport of Liberia or Roberts International Airport.

Kroll was informed that a CBL party, comprised of representatives from the CBL Internal Audit Department, Banking Department and General Services Department, would visit either the Freeport of Liberia or Roberts International Airport to independently check the security of the delivered container(s). The CBL would subsequently form part of a security contingent to escort the new banknotes from the respective port to the HQ Reserve Vault or Waterside Reserve Vault.

The CBL Internal Audit Department stated that the delivered containers were opened for the first time within the perimeters of the HQ Reserve Vault, or outside of the Waterside Reserve Vault, and that the actual cases containing the new banknotes were not opened at any point in this process.

6.3.1.1 Discrepancies in quantity/value of new banknotes delivered to the CBL vaults

Records provided by Crane AB and its logistics company provided a documentation trail for new banknotes totaling LRD 15.506 billion having been shipped by Crane AB. However, delivery documentation provided by the CBL indicated that Crane AB printed and shipped a greater quantity of banknotes to Liberia.

The CBL Internal Audit Department provided Kroll with delivery documentation in the form of IA Memorandums and appended Crane AB packing lists to evidence the delivery of new banknotes from the Freeport of Liberia or Roberts International Airport in Monrovia, into the HQ Reserve Vault or Waterside Reserve Vault between July 2016 and March 2018.

The Crane AB packing lists were used by the CBL Internal Audit Department to independently reconcile the receipt of new banknotes from either the Freeport of Liberia or Roberts International Airport into the CBL reserve vaults, with reference to the number of individual cases within each delivery.

The IA Memorandums stated that Crane AB printed and shipped new banknotes totaling LRD 15.506 billion, yet the appended Crane AB packing lists provided to Kroll by the CBL Internal Audit Department indicated that Crane AB printed and shipped new banknotes totaling LRD 17.450 billion: if accurate, this could equate to over-printing of new banknotes totaling LRD 1.944 billion more than Crane AB and the CBL stated was printed and delivered (LRD 15.506 billion).

The issue specifically related to an IA Memorandum dated December 10, 2017 which stated new banknotes totaling LRD 1,173,500,000 were delivered to the CBL, whereas the appended Crane AB packing lists stated new banknotes totaling LRD 3,117,500,000 were shipped to the CBL, a difference of LRD 1,944,000,000. Appendix C summarizes the information provided to Kroll.

The CBL Internal Audit Department subsequently explained that the Crane AB packing lists provided to Kroll were communicated by the company in draft format for the purposes of preparing customs documentation. The CBL Internal Audit Department also stated that certain IA Memorandums may have included appended draft format Crane AB packing lists in error.

The CBL Internal Audit Department commented that owing to a series of shipping delays in December 2017, the Crane AB packing lists provided to Kroll were not reflective of the actual value of new banknotes delivered to the CBL, which totaled LRD 15.506 billion.

For clarity, Crane AB has categorically stated that new banknotes totaling LRD 15.506 billion were printed and shipped to Liberia. Records also show that the CBL paid Crane AB for new banknotes totaling LRD 15.506 billion.

In addition, the CBL Finance Department provided internal reports and downloads of general ledger accounts to evidence the receipt of new banknotes from either the Freeport of Liberia or Roberts International Airport into the HQ Reserve Vault or Waterside Reserve Vault. These records stated that new banknotes totaling LRD 15.506 billion were received by the CBL.

6.4 Potential discrepancies in shipping/delivery documentation

6.4.1 Potential discrepancy for a July 2016 shipment

Kroll identified inconsistencies in relation to the first shipment of banknotes on July 14, 2016 as part of the LRD 5.0 Bn Contract:

- The Crane AB packing list stated that a shipment dated July 14, 2016 of twelve pallets had a total gross weight of 5,675kg.
- An Emirates air waybill (reference number 176-24450300) dated July 14, 2016 detailed the shipment of the new banknotes between Sweden and Ghana. The Bank of Ghana was listed as the consignee.
- The Emirates air waybill stated that the shipment of twelve pallets had a total gross weight of 5,826kg, which was 151kg more than the weight stated in the Crane AB packing list.
- A Kenya Airways air waybill (reference number 705-2555-7103) dated July 17, 2016 detailed the shipment of the new banknotes between Ghana and Liberia. The Kenya Airways air waybill stated that the shipment had 100 'pieces' (i.e., boxes) and a total gross weight of 5,675kg, the same weight as stated in the Crane AB packing list.

No explanation was provided by the CBL for the weight discrepancy, and Kroll recommends this discrepancy merits further understanding.

Further, the CBL paid total fees of ████████ in respect of the delivery of the new banknotes from Sweden to Liberia. ████████ of the total fees were paid to the Bank of Ghana for insurance premiums, air freight and handling fees (refer to Section 5.3.5.2). It was not possible to consider the accuracy of these fees, as original invoices were not provided by the CBL to Kroll.

The CBL explained that at this time of the shipment there was a critical shortage of available LRD banknotes available for circulation in the operational vaults. The CBL explained that it had a '*Cash Custody Agreement*' with the Bank of Ghana, which enabled the importation of United States Dollars, and that in view of this relationship, the CBL approached the Bank of Ghana to receive the initial consignment in an effort to expedite the delivery of new banknotes (compared to using sea freight).

6.4.2 Potential discrepancy for a December 2017 shipment

Kroll identified a potential discrepancy in relation to a shipment of banknotes in December 2017 as part of the LRD 10.0 Bn Contract.

A Crane AB invoice dated December 17, 2017 and the corresponding Crane AB packing list stated that three pallets weighing 1,430kg had been shipped, in contrast to the corresponding SN Brussels air waybill which indicated that twelve pallets of new banknotes weighing 6,096kg had been shipped.²⁶ Furthermore, customs documentation provided by the CBL indicated that twelve pallets as detailed in the SN Brussels air waybill had been received in Liberia.

²⁶ Note: SN Brussels was acquired by Lufthansa in January 2017 and is now known as Brussels Airlines.

The three pallets detailed in the Crane AB invoice and Crane AB packing list consisted of 1,240,000 new LRD 500 denominated banknotes with a value of LRD 620,000,000 (USD 5,527,817). The SN Brussels air waybill did not specify the actual contents of the pallets, only an overall weight.

Neither Crane AB or the CBL could immediately provide an explanation for this discrepancy. Crane AB introduced Kroll to APC Logistics, the freight forwarder for the shipment, who subsequently provided additional documentation to Kroll. The following paragraphs set out in detail the information and explanations provided by the CBL, Crane AB and APC Logistics in relation to the issue.

6.4.2.1 Summary of Crane AB invoice and Crane AB packing list

A Crane AB invoice, number 171217, dated December 17, 2017 set out an order for 1,240,000 banknotes in LRD 500 denomination equal to LRD 620,000,000.

The corresponding Crane AB packing list set out details of three pallets numbered 10, 11 and 18, which contained twenty-five boxes of new banknotes. The boxes contained 1,240,000 banknotes with a total gross weight of 1,430kg.

6.4.2.2 Summary of SN Brussels air waybill

An SN Brussels air waybill, number 082-71509200, dated December 5, 2017 set out an order for twelve pallets of “*printed matter*” with a total gross weight of 6,096kg.

In contrast to the Crane AB invoice and Crane AB packing list, the nine additional pallets detailed in the air waybill weighed 4,666kg (the denomination of the banknotes was not detailed in the air waybill).

The air waybill detailed the CBL as consignee and APC Logistics as logistics agent.

6.4.2.3 Summary of CBL Finance Department documentation

The CBL Finance Department provided two extracts from the ‘Reserve Vault Ledger’, the first dated December 14, 2017 and the second dated December 17, 2017 to verify the quantity and denominations of new banknotes received in relation to the shipment.

The first extract dated December 14, 2017 showed the total balance of new banknotes stored in the HQ Reserve Vault as LRD 71,250,000. The second extract dated December 17, 2017 showed the total balance of new banknotes stored in the HQ Reserve Vault as LRD 696,250,000, an increase of LRD 625,000,000.

The increase in value of new banknotes was LRD 5,000,000 greater than the value of new banknotes set out in the Crane AB invoice and Crane AB packing list (i.e., LRD 620,000,000). This discrepancy has subsequently been clarified by the CBL as an error in internal documentation (refer to Section 6.4.3).

The Reserve Vault Data ledger stated that twenty-five boxes (serial numbers F0079 to F0096 and F0151 to F0157) were placed into the HQ Reserve Vault on December 17, 2017, which corresponded with the total numbers of boxes detailed in the Crane AB packing list.

6.4.2.4 Summary of CBL customs documentation

The CBL General Support Service Department provided copies of the following customs documentation relating to SN Brussels air waybill, number 082-71509200:

- An air waybill, number 082-71509200, marked as *'Draft'* which matched the SN Brussels air waybill provided by Crane AB (aside from the *'Draft'* marking).
- A Bureau of Customs document titled *'Application for special permit'* which was dated December 7, 2017 which corresponded with the details enclosed in the SN Brussels air waybill. This document stated that the application was for a "...*special permit for delivery of perishable and other articles, immediate delivery of which is necessary*".
- The Bureau of Customs document had a section which stated *"To the Collector: Articles released as described above"* which had been signed by an unknown individual and dated December 8, 2017, indicating that the contents of the air waybill were released and collected.
- A Liberia Revenue Authority document titled *'Assessment Notice'* which was dated December 11, 2017 and corresponded with the details enclosed in the SN Brussels air waybill. The document showed that no taxes were due in respect of the shipment.
- A Liberia Revenue Authority document titled *'Single Administrative Document'* which was dated December 11, 2017 and corresponded with details in the SN Brussels air waybill.

The CBL stated that the aforementioned documents were considered final versions. However, the CBL provided Kroll with three separate Crane AB invoices for the December 2017 shipment, each with variations regarding the number and denomination of new banknotes, therefore it was not possible to ascertain which of the three invoices, if any, represented the actual final version.

6.4.2.5 Explanation for discrepancies from Crane AB

Crane AB provided Kroll with the following information and explanations for the discrepancies:

- Crane AB sent twelve pallets of new LRD 500 denominated banknotes to Brussels Zaventem Airport, which matched SN Brussels air waybill. The pallets should have been transferred on a SN Brussels commercial flight: Crane AB stated that it had cautioned the CBL against putting the pallets on a commercial flight, but CBL Management had insisted on this approach due to high demand for new banknotes.

- SN Brussels intended to place all twelve pallets on one flight, but there was insufficient cargo capacity. Therefore, three pallets were dispatched on one flight consisting of 1,240,000 new LRD 500 denominated banknotes, which was the amount recorded as received by the CBL Internal Audit Department on December 17, 2017.
- Crane AB provided a letter from SN Brussels which corroborated this information. Crane AB explained that SN Brussels did not create a new air waybill to reflect the fact that only three boxes were transported and the remaining nine were transported on a separate flight.
- Crane AB also provided a manifest document which stated: “3 pallets arrived ROB [Roberts International Airport] SN241/17 [Brussels Airlines flight on December 17, 2017]. Rest part 9 pallets booked on flight Dec. 20 to ROB.”.

6.4.2.6 Explanation for discrepancies from APC Logistics

Crane AB provided permission for Kroll to liaise with APC Logistics, who informed Kroll that late changes had been made to the shipments, and provided the following documentation to evidence the amendments:

- A copy of the flight manifest for SN Brussels flight SN241 on December 17, 2017.
- An amended copy of the SN Brussels air waybill (reference 082-71509200) which detailed three pallets corresponding to the Crane AB invoice and Crane AB packing list.
- A copy of a Ukraine Air Alliance air waybill (reference UKL-10019284) which detailed the remaining nine pallets being shipped.
- A letter from SN Brussels explaining the reasons for the shipment delay, together with an email documenting the changes to the shipments.

The amended SN Brussels air waybill (reference 082-71509200) and the Ukraine Air Alliance air waybill (reference UKL-10019284) confirm that all twelve pallets had been transported to Liberia. The nine pallets transported by Ukraine Air Alliance form part of the total number of shipments of new banknotes totaling LRD 15.506 billion delivered to the CBL.

6.4.2.7 Inconsistencies in SN Brussels documentation

For the same shipment, a copy of the SN Brussels flight manifest stated that three pallets with a total weight of 1,524kg were shipped from Brussels to Liberia.

The corresponding Crane AB packing list stated that three pallets with a total weight of 1,430kg were shipped from Brussels to Liberia: a difference of 96kg.

Kroll was not able to determine the reason for this discrepancy.

6.4.3 Discrepancy with CBL documentation

The CBL Internal Audit Department provided Kroll with a Memorandum dated December 18, 2017. The Memorandum set out a summary of the review undertaken by the CBL Internal Audit Department for “...minted banknotes received on December 17, 2017 via Roberts International Airport.” Table 3 of the Memorandum summarized that 1,250,000 new LRD 500 denominated banknotes with a value of LRD 625,000,000 were delivered.

The CBL Finance Department provided two extracts from the ‘Reserve Vault Ledger’, the first dated December 14, 2017 and the second dated December 17, 2017. The first extract dated December 14, 2017 showed the total balance of new banknotes stored in the CBL Headquarters Reserve Vault as LRD 71,250,000. The second extract dated December 17, 2017 showed the total balance of new banknotes stored in the CBL Headquarters Reserve Vault as LRD 696,250,000, an increase of LRD 625,000,000, which matched the information in Table 3 of the Memorandum.

The increase in new banknotes as recorded in the CBL Internal Audit Memorandum and the CBL Finance Department Reserve Vault Ledger was LRD 5,000,000 more than the order set out in the Crane AB invoice and Crane AB packing list (i.e., LRD 620,000,000).

Kroll subsequently established that this discrepancy was due to one box of new banknotes containing a quantity of 40,000 banknotes, compared to the standard quantity of 50,000 banknotes (i.e., LRD 5,000,000). The quantity of 40,000 new banknotes in the box agreed with the expected quantity of new LRD 500 denominated banknotes to be shipped and delivered by Crane AB in total. However, this discrepancy provided further evidence of the inaccurate and incomplete nature of the documentation provided by the CBL to Kroll during the Independent Review.

6.5 Conclusion

6.5.1 Shipping of new Liberian Dollar banknotes

Based on documentation provided by Crane AB, the total value of new banknotes shipped by Crane AB to Liberia between July 2016 to March 2018 totaled LRD 15.506 billion.

6.5.2 Delivery of new Liberian Dollar banknotes

Based on documentation provided by the CBL, in the format of IA Memorandums with appended Crane AB packing lists, the total value of new banknotes shipped by Crane AB to Liberia between July 2016 to March 2018 totaled LRD 17.450 billion, which would equate to over-printing of new banknotes totaling LRD 1.944 billion.

The CBL Internal Audit Department subsequently explained that shipping delays in December 2017 meant that the Crane AB packing lists provided to Kroll were not reflective of the actual value of new banknotes delivered to the CBL, which totaled LRD 15.506 billion. This discrepancy merits further understanding.

6.5.3 Potential discrepancies in shipping/delivery documentation

Kroll identified inconsistencies in relation to the first shipment of banknotes on July 14, 2016 as part of the LRD 5.0 Bn Contract, whereby the Crane AB packing list stated that a shipment dated July 14, 2016 of twelve pallets had a total gross weight of 5,675kg and an Emirates air waybill dated July 14, 2016 stated that the shipment of twelve pallets had a total gross weight of 5,826kg, 151kg more than the weight stated in the Crane AB packing list. No explanation was provided by the CBL for the weight discrepancy, and Kroll recommends this discrepancy merits further understanding.

Explanations have been provided by Crane AB and APC Logistics for a potential discrepancy relating to a December 2017 shipment of new banknotes whereby the Crane AB invoice and Crane AB packing list did not tally with the corresponding air waybill. However, questions remain regarding the accuracy of customs documentation provided by the CBL which differed in total for the same shipment.

7. Fund movements within the CBL

7.1 Overview of vaults

7.1.1 Introduction

The CBL Headquarters houses four vaults: three Operational Vaults and the HQ Reserve Vault. In addition, the Waterside Reserve Vault is located at the former National Housing and Savings Bank.

An overview of the purpose of each Operational Vault and Reserve Vault, as provided by CBL employees, is summarized in this section, together with the output from Kroll's independent verification and reconciliation of physical cash balances for each vault. In summary, the vaults were used as follows:

1. **Operational Vault 1:** Banknotes classed as “sterilized” from a USD 25 million “Mop-Up” Exercise
2. **Operational Vault 2:** Banknotes classed as “mutilated” from the exchange of legacy banknotes
3. **Operational Vault 3:** Banknotes classed as “operational” awaiting circulation
4. **Reserve Vaults:** HQ Reserve Vault/Waterside Reserve Vault for banknotes not yet in circulation

7.1.2 Operation Vault 1: Banknotes from USD 25 million “Mop-Up” Exercise

Kroll was informed by the CBL Banking Department that Operational Vault 1 was used exclusively to store the proceeds of “sterilized” banknotes that had been purchased during a USD 25 million “mop-up” exercise initiated in July 2018 (hereafter the “**USD Mop-Up Exercise**”).²⁷

7.1.2.1 Background to USD Mop-Up Exercise

In a July 16, 2018 address to the nation, President Weah announced that USD 25.0 million would be “infused” into the Liberian economy to “mop-up” excess LRD banknotes in an attempt to address the “...harsh economic situation fueled by steep rise [sic] in the exchange rate between the Liberian and United States dollars”.²⁸

Kroll's open-source research showed that President Weah mandated an Economic Management Team (hereafter the “**EMT**”) chaired by the Honorable Samuel Tweah (hereafter “**Tweah**”), the Minister of Finance and Development Planning, and the CBL to implement the USD Mop-Up Exercise.

Kroll reviewed the ‘Minutes of the 8th Call Meeting of the Board of Governors of the Central Bank of Liberia’ dated July 16, 2018 which stated that a presentation was made by an Assistant Director of the

²⁷ Note: “Sterilized” refers to banknotes removed from circulation, and assessed as being of sufficient quality for recirculation.

²⁸ Source: https://www.emansion.gov.lr/2press.php?news_id=4594&related=7&pg=sp

CBL to the Board of Governors titled *'Policy Response Matrix to Address the Exchange Rate Depreciation'*.

The Minutes stated that the purpose of the USD Mop-Up Exercise was to “...*mop up excess liquidity, stabilize and reduce the exchange rate, given that 90% of currency in circulation remains outside the banking system.*”

The Minutes also stated that the Board of Governors approved the policy actions and noted the following [*bold emphasis added*]:

*“The FX auctions will be conducted periodically over the period over the course of one year. **The L\$ currency mopped up will be sterilized for a one-year period.** This had been done before, but the mopped-up currency was put back into the system by the Government shortly after, instead of being sterilized.*

The CBL must put in place monitoring measures to ensure the funds are used for the intended purposes.”

On July 17, 2018 the Finance Department, under the direction of the CBL Financial Stability Committee (formerly the *'Money Management & Policy Review Team'*)²⁹ provided the CBL Banking Department with a memorandum authorized by Charles Sirleaf to commence the purchase of LRD banknotes. The memorandum authorized the purchase of LRD banknotes using the proceeds from a USD 25 million reserve fund “...*throughout the week beginning today July 17, 2018, to Major importers, Small Liberian Business and FX Bureau through the foreign exchange auction No.509*”.

The CBL Banking Department informed Kroll that USD banknotes were sold at predetermined exchange rates during the USD Mop-Up Exercise:

- USD 1 = LRD 155 for the period July 17, 2018 to August 6, 2018.
- USD 1 = LRD 152 for the period August 7, 2018 to October 26, 2018.

Kroll was informed by the CBL that there was a broad concern that local businesses would seek to “*hoard*” legacy banknotes until the exchange rate recovered (as an example, the exchange rate was USD 1 = LRD 94 on March 30, 2017).

Kroll was also informed by the CBL that there were insufficient banknotes in the HQ Reserve Vault and Waterside Reserve Vault at the time of the USD Mop-Up Exercise to fulfil large withdrawal requests from commercial banks. The CBL Banking Department advised Kroll that in a practical sense, one of the aims of the USD Mop-Up Exercise was intended to enable the CBL to introduce sterilized LRD

²⁹ Note: The FSC comprises the Executive Governor, the two Deputy Governors, and all Directors.

banknotes purchased during the project back into circulation after a period of one year. Kroll was further advised that the USD 25 Million Mop-Up Exercise was initiated to help stabilize the LRD exchange rate against the USD, and would strengthen the liquidity position of the CBL.³⁰

On July 10, 2018 the CBL submitted a request to Travelex Global and Financial Services for a drawdown of USD 20.0 million from a bank account held with the Federal Reserve Bank of New York. The request was made prior to the announcement by President Weah on July 16, 2018. Based on the documentation provided, the USD banknotes were dispatched by air freight on July 11, 2018.

The CBL Banking Department advised Kroll that the USD Mop-Up Exercise involved CBL representatives in six small teams undertaking the physical purchase of legacy banknotes from local businesses and foreign exchange bureaus from August 2018, with the seller being reimbursed for the value of legacy banknotes purchased with new USD banknotes. Kroll was advised that all banknotes, whether legacy or new banknotes, were accepted during the USD Mop-Up Exercise.

7.1.2.2 Independent physical cash verification count

The CBL provided Kroll with a spreadsheet titled *'USD During Auction'* dated October 26, 2018 which set out the total purchases of legacy and new banknotes as part of the USD Mop-Up Exercise.

The spreadsheet stated that LRD 2,303,363,898 (USD 15.0 million)³¹ of the initial USD 20.0 million drawdown by the CBL had been used to purchase legacy and new banknotes. Table 14 summarizes the status of banknotes purchased.

Table 14: Status of USD Mop-Up Exercise as at December 7, 2018

Description	Amount (LRD)	Amount (USD)
Sterilized banknotes (recirculated)	1,281,100,500	8,274,583
Sterilized banknotes (in storage)	1,022,263,400	6,725,417
Total	2,303,363,898	15,000,000

The data in the spreadsheet titled *'USD During Auction'* matched the values in the corresponding general ledger account (named *'CBL Special MOP-UP Exercise Escrow'*).^{32/33}

Kroll was informed by the CBL that the remaining USD 5.0 million of the initial USD 20.0 million drawdown was put into circulation as part of normal banking operations, and not retained for

³⁰ Note: By July 2018 both legacy and new banknotes were circulating in the Liberian economy: the purpose of the USD Mop-Up Exercise was not to permanently remove legacy banknotes from circulation.

³¹ Note: The CBL used the exchange rates set out in Section 7.1.2.1 to calculate USD values for this exercise.

³² Note: The CBL use the Temenos licensed T24 Transact core banking system.

³³ Note: Complete ledger number/name: LRD1000101140001 CBL Special MOP-UP Exercise Escrow

continuance of the USD Mop-Up Exercise. Kroll was informed by the CBL Banking Department that the remaining USD 5.0 million of the USD 25.0 million available had not been withdrawn from the Federal Reserve Bank of New York by the CBL.

The CBL stated that sterilized banknotes were stored in Operational Vault 1. Kroll observed that sterilized banknotes were also stored in the HQ Reserve Vault due to limitations with storage space. Kroll completed an independent physical cash verification count of the sterilized banknotes. Based only on a count of the bags and corresponding information tags there were no reconciliation discrepancies, although the actual contents of each bag of sterilized banknotes was not independently verified by Kroll. Kroll was unable to determine what quantity of the banknotes purchased were legacy or new banknotes or the extent to which any of the sterilized banknotes in storage were mutilated banknotes.

7.1.2.3 Absence of authorization for recircularization of sterilized LRD banknotes

The *Minutes of the 8th Call Meeting of the Board of Governors of the Central Bank of Liberia* dated July 16, 2018 specifically stated that the “...L\$ currency mopped up will be sterilized for a one-year period.”

As at December 7, 2018 sterilized banknotes totaling LRD 1,281,100,500 (USD 8,274,583) had been recirculated into the economy, within six months of being purchased by the CBL as part of the USD Mop-Up Exercise. Kroll was not provided with documentation to evidence that the EMT or the CBL Board of Governors had approved the recirculation of the sterilized banknotes within this time period.

Kroll recommends that further enquiries are undertaken to establish the current status and planned strategy for continuing the USD Mop-Up Exercise.

7.1.3 Operation Vault 2: Banknotes classified as “mutilated”

Kroll was informed by CBL Banking Department that Operational Vault 2 was used exclusively to store mutilated banknotes prior to destruction. Kroll was further advised that mutilated legacy banknotes exchanged for new banknotes were counted, verified and re-bagged onsite, prior to being stored in Operational Vault 2 to await physical destruction.

7.1.3.1 Process for determining status of banknotes

Kroll was informed by CBL Banking Department that there was no formal documented guidance or criteria for classifying a banknote as “mutilated” and that the decision was the responsibility of the individual employee inspecting the banknote. CBL Banking Department stated that the understood definition of a mutilated note was as follows:

- *“Weak paper quality and/or extremely dirty banknotes, where the features were unidentifiable; or,*

- *Partially destroyed/mutilated, with at least one serial number or signature visible on the banknote.”*

Kroll was advised that there were supervisory staff available to assist bank employees reviewing the quality of banknotes who had queries regarding the condition of banknotes and their correct classification.

The individual serial numbers of mutilated banknotes were not recorded by CBL staff, therefore no system existed to ensure that mutilated banknotes were not recirculated back into the economy.

7.1.3.2 Independent physical cash verification count

The CBL provided Kroll with a spreadsheet dated December 19, 2018 that set out the total quantity and denominations of legacy banknotes destroyed in the period February 2017 to December 2018.^{34/35}

Table 15 summarizes the value of mutilated legacy banknotes destroyed or awaiting destruction in the period February 2017 to December 2018.³⁶

Table 15: Status of mutilated banknotes destroyed/awaiting destruction as at December 19, 2018

Description	Status	Amount (LRD)	Amount (USD)
Legacy banknotes purchased (Feb. 17 to Aug. 18)	Destroyed	4,059,150,000	36,190,710
Legacy banknotes purchased (Sept. 18 to Dec. 18)	Pending destruction	243,550,315	2,171,454
Total		4,302,700,315	38,362,164

The CBL Banking Department recorded the receipt and movement of mutilated legacy banknotes in a general ledger account (named *'Mutes in Vault & Cash. Off.'*).³⁷ Kroll completed an independent physical cash verification count on December 7, 2018 to assess the accuracy of the *'Mutes in Vault & Cash. Off.'* general ledger account.

The independent physical cash verification count identified an unreconciled difference of LRD 11,079,510 (USD 98,783) between the value of mutilated legacy banknotes in Operational Vault 2 and the value of mutilated legacy banknotes in the *'Mutes in Vault & Cash. Off.'* general ledger account balance.

Table 16 summarizes the details of Kroll's independent physical cash verification count.

³⁴ Note: Complete ledger number/name: LRD1000101020001 - Mutes in Vault & Cash. Off.

³⁵ Note: No banknotes were destroyed in the period after the first shipment of new banknotes and prior to February 2017.

³⁶ Source: LRD1000101020001 - Mutes in Vault & Cash. Off.

³⁷ Note: "Mutes" refers to mutilated banknotes and "Cash Off" refers to Cash Office.

Table 16: Summary of independent physical cash verification count for Operation Vault 2

Description	Amount (LRD)	Amount (USD)
Mutilated legacy banknotes in Operational Vault 2	██████████	██████████
Mutilated legacy banknotes per general ledger account	██████████	██████████
Difference in values	11,079,510	98,783

Kroll liaised with the CBL Banking Operations team to investigate the discrepancy but has not been able to determine the reason for the difference between the general ledger account balance and the physical cash verification count balance.

7.1.3.3 Concerns regarding the intended purpose of new banknotes (LRD 10.0 Bn Contract)
 Kroll's analysis to assess and validate the status of legacy banknotes either destroyed or pending destruction in Operation Vault 2 raised a separate concern regarding the intended purpose of new banknotes from the LRD 10.0 Bn Contract.

The CBL had proceeded to enter into a contract dated June 12, 2017 with Crane AB to print new banknotes totaling LRD 10.0 billion without obtaining Legislature approval. However, in a subsequent letter dated July 19, 2017 from the Legislature to the CBL it was stated that all legacy banknotes should be replaced with new banknotes in the Liberian economy.

Kroll analyzed information provided by the CBL in respect of legacy banknotes either destroyed or awaiting destruction in the period in which the new banknotes from the LRD 10.0 Bn Contract had been circulated into the Liberian economy: the total value of legacy banknotes destroyed or awaiting destruction was LRD 2.915 billion. Yet in the same period, the CBL had circulated LRD 9.302 billion of the new banknotes from LRD 10.0 Bn Contract.

Therefore, the CBL did not use all new banknotes for the intended purpose of replacing all legacy banknotes with new banknotes. As a result, new banknotes totaling LRD 6.387 billion from the LRD 10.0 Bn Contract were potentially injected by the CBL into the Liberian economy without Legislature approval. Table 17 summarizes this information.

Table 17: Summary of new banknotes from second contract for LRD 10.0 billion injected into economy

Description	Amount (LRD)
Value of new banknotes received by CBL for Second Contract	10,359,750,000
Value of legacy Liberian Dollars collected (destroyed in period Oct. 2017 to Aug. 2018)	-2,672,400,000
Value of legacy Liberian Dollars collected (pending destruction)	-243,550,315
Total increase in value of banknotes in circulation as a result of Second Contract	6,386,949,685

Kroll has sought to obtain information from the CBL regarding the end recipient of the new banknotes (e.g., commercial banks, Liberian Ministries etc.) however the CBL has not been able to provide this information at either a summary or detailed transactional level.

7.1.4 Operational Vault 3: Banknotes classified as “operational”

Kroll was informed by CBL Banking Department that Operational Vault 3 was used exclusively to store operational LRD banknotes, including new banknotes and sanitized legacy banknotes. Operational Vault 3 was also used to store USD denominated banknotes and deposits on hold from commercial banks.

Kroll was informed that new banknotes were not classified as “operational” until they were physically transferred from the HQ Reserve Vault or Waterside Reserve Vault to Operational Vault 3.

7.1.4.1 Independent physical cash verification count

The CBL Banking Department is responsible for the physical movement of new banknotes between Operational Vault 3 and the Front Office Bank Tellers, and records the receipt and movement of operational LRD banknotes in a general ledger account (named ‘*Bk Notes in Vault & Cash. Off.*’).³⁸

Kroll completed an independent physical cash verification count on December 7, 2018 to assess the accuracy of the ‘*Bk Notes in Vault & Cash. Off.*’ general ledger account.

The independent physical cash verification count identified an unreconciled difference of LRD 21,210,579 (USD 189,110) between the value of operational banknotes in Operational Vault 3 and the value of operational banknotes in the ‘*Bk Notes in Vault & Cash. Off.*’ general ledger account.

Table 18 summarizes the details of Kroll’s analysis.

Table 18: Summary of independent physical cash verification count for Operation Vault 2

Description	Amount (LRD)	Amount (USD)
Operation banknotes in Operation Vault 3	██████████	██████████
Operational banknotes per general ledger account	██████████	██████████
Difference in values	-21,210,579	-189,110

Kroll liaised with the CBL Banking Operations team to investigate the discrepancy but has not been able to determine the reason for the difference between the general ledger account balance and the physical cash verification count balance.

³⁸ Note: Complete ledger number/name: LRD1000101000001 - Bk Notes in Vault & Cash.

On a separate note, there were inadequate controls over the storage of new banknotes in Operation Vault 3: Kroll observed loose new banknotes during its independent physical cash verification count, and the CBL could not immediately ascertain if the loose banknotes formed part of the general ledger balance.

7.1.5 Reserve Vaults: CBL Headquarters and Waterside

The Finance Department controls the physical movement of cash from the HQ Reserve Vault or Waterside Reserve Vault to Operational Vault 3, based on replenishment requests prepared by the CBL Banking Department and approved by the Executive Governor.

The primary reasons for replenishment relate to demand for new banknotes from commercial banks, the National Legislature, and Government Ministries and Agencies.

The CBL Banking Department was responsible for the physical movement of new banknotes between the HQ Reserve Vault/Waterside Reserve Vault and Operational Vault 3 and recorded the receipt and movement of operational LRD banknotes in a 'Reserve Vault' spreadsheet.³⁹

Kroll completed an independent physical cash verification count on December 7, 2018 which identified that new banknotes with a total value of LRD ██████ (USD ██████) were stored in the HQ Reserve Vault, and new banknotes with a total value of LRD ██████ (USD ██████) were stored in the Waterside Reserve Vault. Both balances corresponded to the balances in the Reserve Vault spreadsheet.

Kroll observed that the HQ Reserve Vault was also used to store sterilized new and legacy banknotes, which could not be physically stored in Operational Vault 1 due to physical limitations on storage capacity. Kroll was advised by the CBL Banking Department that approval was obtained from the Finance Department to temporarily use space within the HQ Reserve Vault to store sterilized banknotes from the USD Mop-Up Exercise: no evidence of these approvals was provided.

7.2 Summary of other reconciliations performed

7.2.1 Summary of CBL disbursements to external organizations

Kroll was provided with reports from the CBL Banking Department detailing the disbursements paid from the CBL for the period January 2016 to December 2018.

The disbursements information was provided initially on an annual basis, and latterly on a quarterly basis, and split by individual entities (i.e., by individual commercial banks). Kroll requested that the

³⁹ Note: The reserve vault balance is an off-balance sheet item, therefore no general ledger account is retained by the CBL.

CBL provide transactional-level data for a sample period of disbursements between April 2017 and June 2017: this transactional-level data has not been provided to Kroll. The CBL Banking Department manually created the disbursement reports for Kroll, as automated management reports were not available from the CBL’s internal systems. Therefore, Kroll had limited confidence in the accuracy and completeness of the information provided by the CBL in respect of total disbursements.

Kroll analyzed the disbursements information provided by the CBL Banking Department, and grouped recipients into several distinct categories. Table 19 summarizes Kroll’s analysis of the disbursements by the distinct categories for the period January 2016 to December 2018.

Table 19: Summary of disbursements for the period January 2016 to December 2018

Recipient	Amount (LRD)
Commercial Bank Disbursements	██████████
CBL Official Check Account Disbursements	██████████
Ministries & Agencies	██████████
GoL Pension Payroll	██████████
CBL Rural Payment Centers	██████████
GoL Payroll	██████████
Total Disbursements Paid from the CBL per the CBL Banking Department	██████████

Kroll was unable to reconcile the total value of disbursements, as set out in Table 19, for the period January 2016 to December 2018 with the total value of legacy and new banknotes disbursed for the corresponding period. Kroll recommends that a full forensic audit of disbursements from the CBL for the period January 2016 to December 2018 is undertaken, which should include an exercise to verify, that disbursements from the CBL have actually been received in full by the stated recipients (using a risk-based approach).

7.2.2 Internal Audit operation vault reconciliations

Kroll was provided with three internal audit reports, dated December 31, 2017 (Q4 2017), March 31, 2018 (Q1 2018) and June 30, 2018 (Q2 2018): all three reports identify variances between the ‘*Bk Notes in Vault & Cash. Off.*’ general ledger account balance and the physical cash balance in the Operational Vaults, which was consistent with Kroll’s findings.

Internal Audit gave the CBL Banking Department a “*Below Satisfactory*” opinion in each report which was defined by the CBL Internal Audit Department as: “*System of internal controls generally is in place but can be improved upon so as to provide reasonable assurance that significant control objectives*

are achieved efficiently and economically, and risks can be further reduced. Problems may occur if control is not improved, implemented and monitored.”

Table 20 summarizes the variances identified by Internal Audit:

Table 20: Summary of vault balance variances per CBL Internal Audit reports:

Period	LRD Operational Vault overage / (shortage) (LRD)	LRD Mutilated Notes Vault overage / (shortage) (LRD)
Q4 2017	██████████	██████████
Q1 2018	██████████	██████████
Q2 2018	██████████	██████████

In the Q2 2018 report, Internal Audit stated “When the amount reported as overage or shortage is not constant from period to period, it becomes difficult to determine the cause of the overage or shortage, especially when the amount is changed from shortage to overage which is now the case of the overage of L\$42,435,390.03 in clean banknotes. This imbalance in the vault remains unresolved.”

The CBL Internal Audit Department conducted a further physical cash verification count of Operational Vault 2 on December 3, 2018 to assess the accuracy of the ‘Mutes in Vault & Cash. Off’ general ledger account balance. The CBL Internal Audit Department physical cash verification count identified an unreconciled difference of LRD 510 (USD 5), yet Kroll’s independent physical cash verification count identified an unreconciled difference of LRD 11,079,510 (USD 98,783) four days later.

Table 21 summarizes the unreconciled differences identified by the CBL Internal Audit Department.

Table 21: Summary of Operational Vault 2 balance as at December 3, 2018

Description	Amount (LRD)
Banknotes physically verified	██████████
General Ledger balance as at December 3, 2018	██████████
Variance	(510)

The CBL Internal Audit Department conducted a further physical cash verification count of Operational Vault 3 on December 4, 2018 to assess the accuracy of the ‘Bk Notes in Vault & Cash. Off.’ general ledger account balance. The CBL Internal Audit Department physical cash verification count identified an unreconciled difference of LRD 20,393,179 (USD 181,822.21).

Table 22 summarizes the unreconciled differences identified by the CBL Internal Audit Department.

Table 22: Summary of Operational Vault 3 balance as at December 4, 2018

Description	Amount (LRD)
Banknotes physically verified	██████████
General Ledger balance as at December 4, 2018	██████████
Variance	(20,393,179)

The Q2 2018 Internal Audit report also identified that Bank Teller general ledger account balances had a combined uncleared balance of ██████████ as at June 30, 2018: the balance should be zero in accordance with the 'Banking's Department's operational manual'.

Kroll reviewed the Bank Teller general ledger for account (named '*General Teller Cash(NOTES)*')⁴⁰ which details cash movements between Operational Vault 3 and individual bank tellers. Kroll identified an unreconciled balance in this general ledger account throughout the period from January 2016 to December 2018. The balance at December 18, 2018 was ██████████: this represents a significant unreconciled cash balance. Kroll was advised by CBL Banking Department that the CBL Banking Department was aware of the variance and was currently investigating the matter.

7.3 Conclusion

7.3.1 Overview of vaults

A July 2018 USD 25.0 million exercise announced by President Weah was initiated to "mop-up" excess LRD banknotes in an attempt to address the rise in the exchange rate between the Liberian Dollar and the United States Dollar.

Based on the documentation provided to Kroll, the CBL had used LRD 2,303,363,898 (USD 15.0 million)⁴¹ of the initial USD 20.0 million drawdown by the CBL to purchase legacy and new banknotes. As at December 2018 banknotes totaling LRD 1,281,100,500 (USD 8,274,583) had been recirculated back into the economy within six months of being purchased by the CBL, apparently without EMT or CBL Board of Governors approval.

Of the new banknotes printed and shipped by Crane AB for the LRD 10.0 Bn Contract, the CBL has currently injected new banknotes totaling LRD 6.387 billion into the Liberian economy without removing from circulation (and destroying) the equivalent quantity/value of legacy banknotes, potentially without Legislature approval.

⁴⁰ Note: Complete ledger number/name: LRD1000100710001 - General Teller Cash(NOTES)

⁴¹ Note: The CBL used the exchange rates set out in Section 7.1.2.1 to calculate USD values for this exercise.

The increase of banknotes in circulation may be a factor in the current rate of inflation in Liberia. An International Monetary Fund press release in March 2018 stated that “...inflation, which at 14 percent, remains at a relatively elevated level.” Kroll understands that the rate of inflation (as at January 31, 2019) is approximately 25%. Further, the increase of banknotes in circulation may be a factor in the rapid depreciation of the LRD exchange rate between January 2018 and July 2018.

7.3.2 Summary of other reconciliations performed

Kroll’s reconciliations of the physical cash balances in Operational Vault 2 and Operation Vault 3 identified unreconciled differences with the corresponding general ledger accounts.

Further, the CBL Internal Audit Department has also been unable to reconcile the physical cash balances in the Operational Vaults with the corresponding general ledger accounts for the past three quarterly audits.

Appendices

Appendix A: Summary of shipments for LRD 5.0 Bn Contract

Summary of shipments for the LRD 5.0 Bn Contract⁴²

No.	Arrival Date (Crane AB)	Denom.	Quantity	Value (LRD)	Via	Invoice	Weight (kg)	Bill of Lading / Air Waybill
1	14/07/2016	100	5,000,000	500,000,000	Air	042260	5,826.0	176ARN24450300
2	24/07/2016	100	21,650,000	2,165,000,000	Air	042270	25,169.8	574-31692091
3	07/09/2016	50	21,000,000	1,050,000,000	Sea	042272	24,242.0	570422072
4	29/09/2016	10	4,950,000	49,500,000	Sea	042280	17,382.0	710775940
	29/09/2016	20	10,900,000	218,000,000	Sea	042280	17,382.0	710775940
5	03/10/2016	5	16,150,000	80,750,000	Sea	042286	24,190.0	710779058
	03/10/2016	10	5,800,000	58,000,000	Sea	042286	24,190.0	710779058
6	22/12/2016	500	2,050,000	1,025,000,000	Sea	161203-3	2,361.0	710799198
Total			87,500,000	5,146,250,000				

⁴² Source: Crane AB.

Appendix B: Summary of shipments for LRD 10.0 Bn Contract

Summary of shipments for the LRD 10.0 Bn Contract⁴³

No.	Arrival Date (Crane AB)	Denom.	Quantity	Value (LRD)	Via	Invoice	Weight (kg)	Bill of Lading / Air Waybill
1	20/10/2017	20	11,250,000	225,000,000	Air	171011-1	12,175.0	082-71416811
2	22/10/2017	20	11,250,000	225,000,000	Air	171011-2	12,175.0	082-71416822
3	14/11/2017	10	16,200,000	162,000,000	Sea	171016	17,549.0	710871683
4	22/11/2017	20	26,750,000	535,000,000	Sea	171026	28,955.0	710873539
5	22/11/2017	10	8,100,000	81,000,000	Sea	171027	8,768.0	710871902
6	29/11/2017	10	10,700,000	107,000,000	Sea	171103	18,129.0	710871912
	29/11/2017	5	6,000,000	30,000,000	Sea	171103	18,129.0	710871912
7	13/12/2017	500	450,000	225,000,000	Air	171210	6,204.0	082-71290800
	13/12/2017	50	4,950,000	247,500,000	Air	171210	6,204.0	082-71290800
8	17/12/2017	500	1,240,000	620,000,000	Air	171217	6,096.0	082-71509200
9	20/12/2017	500	4,050,000	2,025,000,000	Air	171220-1	4,572.0	UKL-10019284
10	20/12/2017	50	5,400,000	270,000,000	Air	171220-2	6,203.0	UKL-10019295
11	20/12/2017	50	4,650,000	232,500,000	Air	171220-3	5,366.0	UKL-10019306
12	18/01/2018	100	36,000,000	3,600,000,000	Sea	171224	41,435.0	GDY0187685
13	04/02/2018	100	14,000,000	1,400,000,000	Sea	180108	16,180.0	574810618
14	28/03/2018	5	250,000	1,250,000	Sea	19022018	3,155.0	770367707
	28/03/2018	10	250,000	2,500,000	Sea	19022018	3,155.0	770367707
	28/03/2018	50	320,000	16,000,000	Sea	19022018	3,155.0	770367707
	28/03/2018	100	1,500,000	150,000,000	Sea	19022018	3,155.0	770367707
	28/03/2018	500	410,000	205,000,000	Sea	19022018	3,155.0	770367707
Total			163,720,000	10,359,750,000				

⁴³ Source: Crane AB.

Appendix C: Summary of IA Memorandums and Crane AB Packing Lists

Summary of information provided by CBL⁴⁴

CBL Internal Audit Memorandum		Appended Crane AB Packing List		Difference
<u>Date</u>	<u>Amount (LRD)</u>	<u>Date</u>	<u>Amount (LRD)</u>	<u>Amount (LRD)</u>
July 22, 2016	500,000,000	July 14, 2016	500,000,000	-
July 27, 2016	2,165,000,000	July 24, 2016	2,165,000,000	-
September 13, 2016	1,050,000,000	August 15, 2016	1,050,000,000	-
October 3, 2016	267,500,000	September 3, 2016	267,500,000	-
January 4, 2016	1,025,000,000	December 3, 2016	1,025,000,000	-
October 10, 2016	138,750,000	September 17, 2016	138,750,000	-
October 24, 2017	450,000,000	October 11, 2017	450,000,000	-
October 16, 2017	162,000,000	October 16, 2017	162,000,000	-
December 20, 2017	535,000,000	October 26, 2017	535,000,000	-
December 1, 2017	137,000,000	November 3, 2017	137,000,000	-
December 10, 2017	1,173,500,000	December 10, 2017	2,700,000,000	1,526,500,000
		December 12, 2017	417,500,000	417,500,000
December 28, 2017	2,527,500,000	December 20, 2017	2,527,500,000	-
January 25, 2018	3,600,000,000	December 24, 2017	3,600,000,000	-
February 8, 2018	1,400,000,000	January 8, 2018	1,400,000,000	-
April 4, 2018	374,750,000	February 19, 2018	374,750,000	-
Total	15,506,000,000		17,450,000,000	1,944,000,000

⁴⁴ Source: CBL.



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