

**NEW PATRIOTIC PARTY
NADOWLI/KALEO CONSTITUENCY
DISCIPLINARY COMMITTEE**

**REPORT ON PETITION AGAINST
MR ELVIS BANOEMULENG
BOTAH**

**SUBMITTED TO:
CHAIRMAN, NPP
NADOWLI/KALEO CONSTITUENCY
NADOWLI, UWR**

SEPTEMBER 9, 2018

1.0 INTRODUCTION

On August 5, 2018, the Executive Committee of the NKC forwarded, to the DC of the constituency a petition (Appendix1) from two members of the NPP (Messrs Kanlariba and Mornah, against MR Elvis Banoemuleng Botah the immediate past Parliamentary Candidate of the constituency.

Brief profiles of the petitioners is as follows:

- 1. Felix Kalariba, Nadowli Market ‘A’ Polling Station, Nadowli; NPP membership card no. UW152410007K**
- 2. Raymond Ankubo Mornah, Town Hall Polling Station, Sankana; NPP membership card no. UW163810003R**

In line with its mandate (as spelt out in the NPP constitution (Article 4.3), the DC set out to investigate the allegations contained in the petition.

This document represents the Committee’s findings and recommendations on the said petition, duly submitted to the Executive Committee.

2.0 PROCEDURE

Following the receipt of the petition, the DC convened a total of 11 meetings to interrogate relevant parties and undertake other related activities. Appendix 2 shows the schedule of the Committee’s activities during the period of investigations.

During its sittings, the Committee interrogated the petitioners, elected constituency executives and leaders of constituency election campaign teams. Some witnesses were also contacted to seek evidences or provide necessary information. Appendix 3 contains the list of people interrogated/contacted.

The defendant failed to appear before the committee even though he was duly invited (after more than two weeks to establish contact with him), and he personally pledging to honour the invitation on his preferred date.

Appendices 4 and 5 are direct communications with the defendant regarding his invitation to appear before the committee.

3.0ALLEGATIONS/CHARGES

After a critical perusal of the full petition, the allegations/charges against the defendant were summarized into three main ones, viz,

- 1. Undermining party unity and cohesion**
- 2. Dishonest posture about social status**
- 3. Illegal issuance of party membership Cards**

4.0 INTERROGATIONS

On the basis of he who alleges, must prove, the petitioners were the first to appear before the committee, to substantiate each stated allegation, and provide all necessary evidences and witnesses in each case.

The interrogations revolved around the identified allegations, as contained in the follow sections:

4.1 Undermining party unity and cohesion

4.1.1 Disrespecting and undermining the authority of the constituency chairman

The petitioners alleged that the defendant, by his actions and inactions, positions himself as though the constituency chairman was his contemporary. As such, they further alleged he has succeeded in splitting the loyalties of executive committee members between himself and the chairman.

With the exception of the Treasurer (Peter Nanzonige)all the members who were interrogated said there was division within the executive along the lines of the the chairman and the defendant respectively. This situation, according to petitioners is causing disharmony in the executive and thus making them functionally ineffective. Some of the executive committee members agreed with the petitioners that their performance has been dismal and something needed to be done about it.

Petitioners further explained that there was some bad blood between Botah and the Chairman. To support their claim

they tended in , as evidence ,a radio recording in which the chairman was heard denigrating the defendant as a liar and unfit for political office.

When interrogated on the subject, the chairman confirmed his outbursts and said he was called by a local radio Station(Tumpani fm) in Nadowli to speak to an issue regarding the issuance of party membership cards in the constituency . He said the exercise was something he had no knowledge of and therefore had to be blunt about the character of the defendant, whom he said was the direct sponsor of the illegal exercise.

According to the chairman, his radio discourse sparked off a reaction from the defendant's loyalists on the committee. Apart from issuing a disclaimer to the chairman's utterances. they also petitioned the Regional Disciplinary Committee requesting for the suspension of the chairman.

According to some executive officers (Chairman, Youth organiser, Ag Secretary and Women Organiser), these developments have further widened the cracks within the executive. The Youth Organiser in particular said if the situation persists, our political fortunes will seriously dwindle in any future elections.

In responding to the situation , one Joachim Bonseu, immediate past first vice chairman and leader one of the constituency election campaign teams, said our opponents have been given some ammunitions to nail the party during

the general election, especially if the defendant is the party's candidate.

4.1.1 Sabotach of a 'thank you' tour in Charikpong Zone

On the above allegation, petitioners explained that after the last constituency elections the elected executives embarked on a tour of the constituency to thank delegates for electing them into office. They said whilst the visit was successful in all other zones the exercise was abortive in the Charikpong zone. According to petitioners, when the chairman and his entourage arrived at the venue for the meeting on the scheduled day and time, they were confronted with the question 'where is Botah? And went further to chant that 'no Botah, no meeting'. Petitioners further alleged that the constituency chairman's attempt to explain Botah's absence fell on death ears and was rather met with boos and walkouts. After fruitlessly trying to convince the delegates to stay, the meeting was aborted.

Petitioners said they later heard that it was the defendant who had earlier instructed the delegates in the zone not to entertain the chairman and the team if they ever came there, without him. This was corroborated by the chairman and Ag. Secretary who were both part of the visting team. Both said they were privy to information that the defendant and two of his loyalists ie, the former Secretary(Gado Ali) and former communication officer(Joseph Kontomoh), who were

allegedly in a hideout in the community had earlier instructed the delegates to decline meeting the team (without the defendant).

Quizzng the constituency chairman on the reasons for the exclusion of the defendant on the tours (when he was an integral part of his campaign team), he said they decided not to include him on the tour because that would send the wrong signal that the executive committee was supporting and promoting the defendant's political agenda.

The chairman added that the defendant's actions have splitted the constituency into two, that is nadowli-charikpong on the one hand and the kaleo area on the hand. He said all the defendant's loyalists were from the Nadowli-Charikpong area, where he hails from.

4.1.3 Openly Supporting one team during constituency election

Petitioners expressed dismay at the defendant's open support for one of the campaign teams (incumbent chaiman's team) during the constituency executive elections in February 2018. They said he assumed the role of a campaign manager, mounted platforms and openly declared support for the said team with the explanation that it was only a win for that particular team that would guarantee his endorsement as a parliamentary candidate for the 2020 general elections. This, according to the petitioners, angered the candidates and supporters of the other competing teams,

with some members of the losing teams vowing to campaign against his candidature in any elections. This, according to petitioners, will once again cost the party the parliamentary seat, as well as reduce the fortunes of the party's presidential candidate.

The constituency chairman acknowledged the defendant's role in his team's campaign. He opined that he played a key role not only in his victory, but also that of the other team members. This was corroborated by some of his team members on the executive notably the Ag. Secretary and the Nasara Coordinator.

On their part, leaders of the two losing teams acknowledged that the defendant played a key role in their loss by moving around and commending Team Martin whilst at the same time discrediting their teams as evils. They exhibited clear bitterness over what they called the unethical behavior of the defendant. One said the harm he has caused by this singular act is irreparable and posited that 'Botah is my totem'.

From their disposition and utterances, it was evident that the two defeated leaders and their supporters are looking forward to paying back the defendant for his role in their defeat at the constituency elections.

4.1.4 Interference with appointment of some office holders

Petitioners said the defendant's open disapproval of the constituency chairman's list of government appointees to the Nadowli/Kaleo District Assembly (NKDA.) and also appointive positions in the executive committee, undermined the authority of the Constituency chairman.

The constituency chairman said defendant's open confrontation with him led to his dropping of some names and replacing them with names of his (defendant's) choices in both the DA and the constituency executive committee

According to some of the executive officers (Youth and Women Organizers, the chairman strangely appointed their deputies without seeking their opinion.

4.1.5 Objection to DCE's Nomination and Confirmation

Petitioners also had an issue with the defendant over the nomination and confirmation of the president's nominee for DCE for the NKDA.

They alleged that he mobilised, mostly the youth, and sponsored a press conference at Nadowli, against the nomination and approval of Md Kate Lankonno, the president's nominee for DCE. They claim the press conference as well as the press release tendered in evidence were the handiworks of the defendant. The press statement

read at the press conference is captured by Starrfm (starrfonline.com of 24/4/17.)

4.1.6 Planned interference in chieftaincy affairs

The petitioners said the defendant is on record to have promised one of the feuding factions (Dambaa) in the Nadowli chieftaincy dispute that he will ensure that they ascended the vacant skin, if he became the MP for the Nadowli/Kaleo constituency.

According to the petitioners, this has not gone down well with members of the Nadowli community who are privy to the alleged promise.

They said interfering in chieftaincy matters, the way he plans to do,, is a recipe for chaos and will affect the NPP negatively in the Nadowli area.

Even though petitioners said a voice recording on the pledge was available they could not tender it in evidence. There is therefore no evidence to rely on to draw any logical conclusion.

4.1.7 Preventing the use of party office in Nadowli

Petitioners alleged that because of a purported misunderstanding between the defendant and one Issahaku Dapila, the donor of the existing office space to the party, in Nadowli, the said office is not adequately utilized. They claim the defendant instructed that no party activity should take place in the party office. According to the chairman, Ag

Secretary and Women organizer, the defendant's loyalists refused to attend meetings in the said office.

To further display his hatred for the office, the petitioners alleged the defendant declined to allow the then Ag national chairman (Hon Freddie Blay) to stopover (whilst on his way to Jirapa) and address waiting party executives and supporters at the office premises.

The defendant, who claimed to be Ag. Chairman's campaign manager for the UWR defied all pleas to reconsider his stand. Petitioners alleged he said, as coordinator, he had planned a joint meeting for Jirapa and Nadowli, at Jirapa and so people should find their way to Jirapa to be addressed by the chairman there. This caused dissatisfaction and anger among assembled supporters, most of whom refused to make the trip to Jirapa. Only executives purported to be loyal to the defendant were assisted to make the trip.

This was corroborated by the chairman and Ag. Secretary and supported the petitioners claim that the attitude of the defendant demonstrates his gross disrespect for constituency executives in particular, and party supporters in general.

According to the Ag Secretary, at one point there were indications that the defendant had identified an alternative office space for an annual rent of GHC1500.00 , but when the matter came up at a meeting, the rationale and

conditions were questioned, and the intent looks shelved. The existing office has since been refitted and put to good use

4.2 Display of Dishonesty about social status

Petitioners alleged that prior to the 2016 parliamentary primaries, the defendant made certain pronouncements about himself which later turned out to be false. They listed them as follows:

- i. that he is a professional lawyer**
- ii. that he holds a First Degree**
- iii. that he holds a PhD from a foreign university**
- iv. that he is an international consultant**
- v. that he is a Director with an international NGO in Accra**

According to petitioners, their underground checks have revealed that the defendant holds only a Diploma certificate in International Relations, and is also unemployed.

Except the chairman and Ag Secretary who said the defendant personally told them about those credentials, the Youth Organiser said he also heard same several times from the then secretary(Ali Gado)on campaign platform on which the defendant was always present. Others, including the Nasara Coordinator and Treasurer however said they never heard such a thing, either personally from him directly or on a campaign platform.

According to the petitioners, these false claims about himself, which are now an open secret in the constituency and beyond, puts the defendant and party in bad light. They claim, our political opponents have begun mocking at the party, and waiting eagerly to make political capital out of the defendant's alleged dishonesty if he's ever presented as the party's candidate for any elections.

The evidence on this allegation is scanty since the committee had no access to any document from either the petitioners or defendant, to form a basis for any conclusion

3. Supporting the issuance of fake party membership cards

Petitioners alleged that the defendant arranged and supported the issuance of what turned out to be fake party membership cards to unsuspecting polling station executives and other party supporters. Petitioners tendered in a number of the said cards as evidence. A comparison of the features of the cards with an authentic membership card (those issued by the party headquarters) revealed the following deficiencies in the defendant-supported cards:

- i. No expiry date**
- ii. Questionable General Secretary's signature**
- iii. Passport size picture of defendant embossed at the rear with the inscription 'Thank You for 2016'**

According to the petitioners, upon hearing of the exercise in the constituency, the IT Director at the Party's headquarters instructed that the exercise be discontinued immediately and all already-issued cards recalled. In an audio recording submitted as evidence to confirm the illegality of the exercise, the IT Director was clearly heard saying (to the defendant):

'..... but who told you that he's a vendor?.

.... all the cards that he's issuing is fake. Is fake

..... but who told you he's a vendor?

.... all the cards that he's issuing is fake..

...That guy! I'll get him arrested. Am not joking.This is the second time he's done the same thing

... I need all the cards.

..... Listen. Whatever you've done there, retrieve them . I need every single of the cards. ...

....Retrieve all the cards'

The defendant was heard in the background attempt to plead for time to re-engage the IT Officer on the issue.

On how they came by the cards, two cardbearers, (Mark Jebuni and Iddrisu Fuseini) said they heard an announcement to the effect that the PC had arranged for

the issue of party membership cards to all PSEs and other supporters without membership cards, for free. They said they actually paid nothing to acquire the cards.

Both said they were later requested to remove the picture of the defendant at the rear of the card, which they decline. Mark added that it was at that point he suspected there was something wrong with the cards

The Constituency Chairman confirmed the narrations of the submission. He said he had no prior knowledge of the exercise and further confirmed that he was instructed to get the defendant and the vendor arrested.

On whether the instructions to him to get the defendant and vendor arested was effected, he responded in the negative and explained that the arrest of the defendant in particular,would have put the party in bad light. He revealed that the instruction to the defendant to recall the cards has been ignored, with impunity, and all the cards are still with the beneficiaries. This, the chairman considers as gross disrespectful to authority.

When asked whether the vendor had paid any monies to the constituency, as required, he said he had no information to that effect. The Treasurer said he was never aware of such an arrangement.

5.0 GENERAL CONCLUSION

The committee carefully considered the allegations in the light of the totality of the evidence adduced, and in accordance with the provisions of the NPP Constitution, and concluded that there is sufficient evidence against the conduct of THE DEFENDANT in respect of the following areas:

- i. Creating disharmony within the party by his actions related to**
 - ✓ Aligning with and campaigning for a one of the competing teams in the February 2018 constituency elections**
 - ✓ Attempting to establish an alternative party office.**
- ii. Organizing and Supporting the issuance of fake party membership cards**
- iii. Organizing and sponsoring a press conference against the confirmation of the president's nominee for DCE for Nadowli/Kaleo constituency, Kate Lankono.**
- iv. Gross disrespect for party structures, evidenced by his refusal to appear before the Constituency Disciplinary committee, with impunity**

The committee also concludes that there is no credible or sufficient evidence to incriminate the defendant with regard to the following allegations:

- i. Influencing abortive meeting in Charikpong**
- ii. Dishonesty about his social status**

iii. Planned interference in Nadowli chieftaincy affairs

6.0 RECOMMENDATIONS

- 1. Having concluded that the defendant is guilty of some misconduct in his actions and inactions, we recommend that he be suspended from the party indefinitely to serve as a deterrent to other party members contemplating committing same or similar acts of misconduct.**
- 2. Members to desist from attacking and counterattacking each other on media platform. The party's internal structures such as party elders and patrons should be utilised in addressing misunderstandings between members.**
- 3. There is no need for an alternative (rented) office. The party should instead strive to acquire land and construct its own permanent office**
- 4. There is the need for party members to exhibit humility in their dealings with each other and with appropriate authorities.**

Appendix1: Petition

Appendix2: Schedule of Committee’s Activities

DATE	ACTIVITY	PURPOSE	REMARKS
Sunday, 12/8/18	Full Committee sitting	Review Petition and set agenda for deliberations	
Sunday, 19/8/18	Full Committee sitting	Build consensus on allegations/charges	
Monday, 20/8/18	Full Committee sitting	Interrogate petitioners	Both petitioners appeared
Tuesday, 21/8/18	Full Committee sitting	Interrogate defendant	Defendant failed to appear because all efforts by the DC to contact and invite him failed. Rescheduled to 24/8/18
24/8/18	Full Committee sitting	Interrogate defendant	Defendant unable to turnup, without apology. Rescheduled to 31/8/18
Friday, 31/8/18	Full Committee sitting	Interrogate defendant	Defendant unable to turnup, with apology. Rescheduled to 7/9/18 at his request
Friday, 7/9/18	Full Committee sitting	Interrogate defendant	Defendant failed to appear, without any apology
Saturday, 8/9/18	Full Committee sitting 1(am) Full Committee sitting 2(pm) Subcommittee meeting(pm)	Interrogate members of the executive committee Interrogate leaders of constituency election campaign teams Prepare Report	All elected executives except 1st and 2nd vice appeared Joachim Bonseu and Isaac Bondana appeared Worked overnight

Sunday 9/9/18	Full committee sitting	Review Report Edit and Submit Report to EC-NKC	
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Appendix 3: List of Persons Interrogated/Contacted

S//NO	NAME	POSITION	CONTACT
1	Felix Kanlariba	Petitioner	0205110365
2	Raymond Ankubo Mornah	Petitioner	
3	Adama Amadu	Youh Organiser	0541258729
4	Anthony Blandy	Ag Secretary	0203516020
5	Christiana Bokunoba	Women Organiser	0205006087
6	Peter Nanzonige	Treasurer	0245355585
	Martin Nawaama Andonye	Chairman	0209383060
7	Ernest Yendeme	Organiser	0244055888
8	Majeed Elewe	Nasara Coord	0209313309
9	Joachim Bonseu	Campaign Team leader	0208034734
10	Isaac Bondana	Campaign Team leader	0540040198
11	Mark Jebuni	Polling Stn Chairman	0248573156
12	Bornas Hemas	PS Organiser	NA
13	AsataKonkoh	PS Women Organiser	NA
14	Tabuorononbo JaneFrances	Youth Organiser	NA

Appendix 4: Whatsapp communication with defendant on invitation (27/8/18)

Committee chairman (CC): you are invited to appear before the disciplinary committee of the nkc to respond to allegations in a petition we received from some members of our party

Date;

Time: 10.00am prompt

Please confirm your appearance

Defendant(D): What date? May I know date to enable me check out my availability. It is also proper that I am served with written notice with copies of allegations made against me . Good day, Sir.

CC: Sorry for the omission. Its Friday, 31/8/18. Good day. Am fine and hope it's same with you. We were made to understand you have been duly served a copy of the petition. Nonetheless, we will serve you a copy. Kindly provide appropriate contact.

D: Will revert on this. It appears impromptu. I am fine

CC: Please give us a definite position on appearance

D: I am confused here.....I could only be served the petition by your committee, so its surprising if another quarters are those claiming to have served me the said petition otherwise than your committee. Nonetheless, its fine....I will respond as appropriate when I officially receive my copy of petition, and will respectfully submit to necessary proceedings in respect of same with critical and constructive attention to matters therein. #till then, I only remain expectant. regards, Sir.

CC: Please, remember to furnish us with your contact for delivery of necessary correspondences

Appendix 5: Email Communication With Defendant on Invitation

Re: Invitation to appear before Disciplinary Committee

BE

BOTAH B. ELVIS <kingbotjnr@yahoo.com>

Reply

Thu 8/30, 12:08 PM

You;

Kingbotjnr@yahoo.com (kingbotjnr@yahoo.com)

You replied on 9/3/2018 7:12 PM.

Dear Sir,

My attention has been drawn to your official mail last night inviting me in respect of the subject above. However, I will be unable to turn up on the said date following some critical schedules am engaged in at the moment. With much respect to the committee, I like to suggest next week Friday for the purpose. This will enable me make time off schedules to appear.

I must also indicate that I received a copy of the petition yesterday from the Nadowli Post office, and also had social media pictures of same from Mr Dambia this morning.

Kindly expect my cooperation. Regards!

Elvis Banoemuleng BOTAH
(2016 PC, Nadowli-Kaleo)

[Sent from Yahoo Mail on Android](#)

On Mon, 27 Aug 2018 at 13:07, Boye Bandie
<BBandie@hotmail.com> wrote:

Invitation to appear before Disciplinary Committee

Dear Mr. Botah,

You are cordially invited to appear before the Disciplinary committee of the Nadowli -Kaleo Constituency, to respond to allegations contained in a petition submitted to us by two members of the New Patriotic Party in the Nadowli-Kaleo constituency. We are reliably informed you are duly served with the petition.

Date: August 31, 2018

Venue: Residence, Disciplinary Committee Chairman (Dr Boye Bandie)

Time: 10.00am prompt

Please, acknowledge receipt of this mail asap.
We look forward to seeing you on the scheduled date and time
Best Regards

Signed
Dr Boye Bandie
(Chairman, Disciplinary Committee, Nadowli-Kaleo Constituency)

DISCIPLINARY COMMITTEE MEMBERES

S/N	NAME	STATUS	SIGNATURE
1	DR BOYE BANDIE	CHAIRMAN	
2	MR MOSES DONNEYONG	MEMBER	
3	MADAM BEATRICE JATOE-KALEO	MEMBER	
4	MADAM MARY ELEDI	MEMBER	
5	MR OSBERT DAMBIA	SECRETARY	

