



WRIT OF SUMMONS

(Order 2 rule 3(1))

CJ/098/2021

WRIT ISSUED FROM ACCRA 03/06/2021 SUIT No.

IN THE HIGH COURT OF JUSTICE GENERAL JURISDICTION, ACCRA - A.D. 2021

BETWEEN **EDWARD AKUFO-ADDO**
NO. 2 MASERU STREET, EAST LEGON
ACCRA Plaintiff *

AND

- | | | |
|--|---|------------|
| <ol style="list-style-type: none"> 1. CLASS MEDIA GROUP (CMG)
ACCRA 3. MENSAH THOMPSON
ACCRA | <ol style="list-style-type: none"> 2. KWABENA BOBIE ANSAH
ACCRA 4. LISTOWELL NANA KUSI-POKU
ACCRA | Defendants |
|--|---|------------|

To: *Plaintiff will direct service*

AN ACTION having been commenced against you by the issue of this writ by the above-named Plaintiff.

EDWARD AKUFO-ADDO

YOU ARE HEREBY COMMANDED that within EIGHT DAYS after service of this writ on you inclusive of the day of service you do cause an appearance to be entered for you.

CLASS MEDIA GROUP (CMG) AND 3 OTHERS

AND TAKE NOTICE that in default of your so doing, judgment may be given in your absence without further notice to you.

Dated this 03 day of JUNE, 2021...



ANTIN YEBOAH

NB: This writ is to be served within twelve calendar months from the date of issue unless, it is renewed within six calendar months from the date of that renewal.

The defendant may appear hereto by filing a notice of appearance either personally or by a lawyer at Form 3 of the Registry of the Court of issue of the writ at [] A defendant appearing personally may, if he desire give notice of appearance by post.

State name, place of residence or business address of plaintiff if known (not P.O. Box number).
State name, place of residence or business address of defendant (not P.O. Box number).

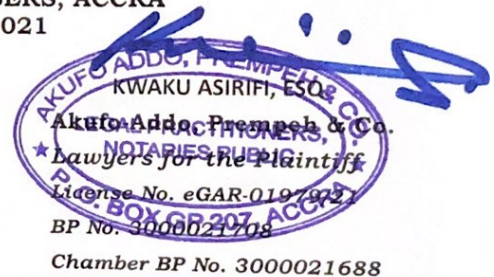
SEAL: 03/06/2021
HIGH COURT ACCRA

STATEMENT OF CLAIM

The Plaintiff claims against the Defendants jointly and severally as follows:

- a) Ten Million Ghana Cedis (GH¢10,000,000.00) damages for defamation contained in the publication by Defendants on 29/05/21 and more particularized in paragraph 9 of this Statement of Claim.
- b) An apology and retraction of the words complained of particularly in paragraph 9 of the Statement of Claim with the same prominence as the impugned publication.
- c) Perpetual injunction restraining the Defendants whether by themselves, their servants, agents or assigns from repeating same or other similar words of and concerning Plaintiff.
- d) Cost inclusive of legal fees.

DATED AT KWAKWADUAM CHAMBERS, ACCRA
THIS 1ST DAY OF JUNE, 2021



This writ was issued by **KWAKU ASIRIFI, ESQ.**

whose address for service is **MESSRS AKUFO-ADDO, PREMPEH & CO.
67 KOJO THOMPSON ROAD, ADABRAKA, ACCRA**

Agent for **PLAINTIFF**

Address Number and date of lawyer's current licence.

Lawyer for the plaintiff **EDWARD AKUFO-ADDO** who resides at **EAST LEGON, ACCRA**

Indorsement to be made within 3 days after service

This writ was served by me at

on the defendant

on the _____ day of _____

endorsed the _____ day of _____

Signed.....

Address.....

NOTE: If the plaintiff's claim is for a liquidated demand only, further proceedings will be stayed if within the time limited for appearance the defendant pays the amount claimed to the plaintiff, his lawyer or his agent or into court as provided for in Order 2 rule 3(2).

IN THE SUPERIOR COURT OF JUDICATURE
IN THE HIGH COURT OF JUSTICE
GENERAL JURISDICTION
ACCRA - A.D. 2021



BETWEEN

EDWARD AKUFO-ADDO
No. 2 Maseru Street,
East Legon, Accra.

...

PLAINTIFF

AND

1. **CLASS MEDIA GROUP (CMG)**
Accra.

...

DEFENDANTS

2. **KWABENA BOBIE ANSAH**
Accra

3. **MENSAH THOMPSON**
Accra

4. **LISTOWELL NANA KUSI-POKU**
Accra

(Plaintiff shall direct service)

STATEMENT OF CLAIM

1. Plaintiff is a Ghanaian businessman and the Managing director of Amaadi Cold Stores Limited and affectionately referred to by friends as Bompty.
2. Plaintiff is the only biological brother of the current President of Ghana, His Excellency Nana Addo-Dankwa Akufo-Addo, son of the former President of Ghana, H.E. Edward Akufo-Addo and grandson of Sir Nana Ofori Atta I — all of whom are well known for their public service in Ghana spanning several decades.
3. 1st Defendant is a Ghanaian business entity that owns several radio stations in Ghana including Accra FM which operates the frequency 100.5 in Accra.
4. 2nd Defendant is a media presenter and the host of a program dubbed "The Citizen Show" which is aired on 1st Defendant's Accra FM.

5. 3rd Defendant touts himself as the Executive Director of a group called Alliance for Social Equity and Public Accountability (ASEPA).
6. 4th Defendant also touts himself as the Executive Director of a group called Good Governance and Advocacy Group Ghana.
7. Plaintiff avers that on 29/05/2021, 2nd defendant hosted and aired on 1st Defendant's Accra FM, a program dubbed "The Citizen Show" with 3rd and 4th Defendants as panelists. The program was also broadcasted live on Accra FM's facebook page, Sunyani FM (88.1) and Taadi FM 99.1 — all of which are owned by 1st Defendant.
8. Plaintiff avers that in the course of the program, the 3rd and 4th Defendants, aided and encouraged by 2nd Defendant published of and concerning false and malicious statements about Plaintiff's alleged use of the Ghana Presidential Jet, also known as "the Falcon".
9. The following are the verbatim reproduction of the impugned parts of the statements made by the 2nd, 3rd and 4th Defendants using 1st Defendant's radio station.

"Mensah: No, but we cannot continue to allow these people to take us to ransom. That presidential jet he has rejected, he says it cannot fly and all that, while he was traveling with the rented one, his sibling Bompty is the one who now uses the presidential jet.

Bobie: You don't mean it.

Mensah: I am telling you, that's a fact. Bompty uses the presidential jet, he uses it. The presidential jet is at the disposal of Bompty, your brother. It is the one he travels in wherever he goes. When you have wasted the resources of the country to rent the private jet then your brother would be cruising in this one.

Bobie: Master, are you sure?

Mensah: It is the fact, I am telling you. I am saying this on authority that the presidential jet, the Falcon, is at the disposal of Bompty.

Listowell: Yes, his younger brother.

Mensah: That's the one his younger brother is cruising in around. We don't know what he is doing. It is the country fueling it (presidential jet). Commander (referring to Bobie Ansah), all this information, it's the embassies who give us this information

because they track the flight radar of the Falcon. So when the presidential jet, having gone to hire a private jet, the Falcon would be in Abuja. Who was using the Falcon in Abuja? Bompty! What are we confronted with in this town? You see, all these are there and Ghanaians we are not angry enough! This Falcon was bought by President Kufour, who used it.

Bobie: Kufour bought it at the tail end of his administration.

Mensah: When Mills came, he used it. Mahama came and also used it. You came just 2018, you have spent monies to change the interior of the Falcon, wasted the country's funds and afterwards you say you don't have need for it. You are spending the country's money to charter flights traveling around and have given the Falcon to your sibling as if it were a family property. Is the Falcon a property of the family? Is the Falcon your family property to put it at the disposal of your brother?"

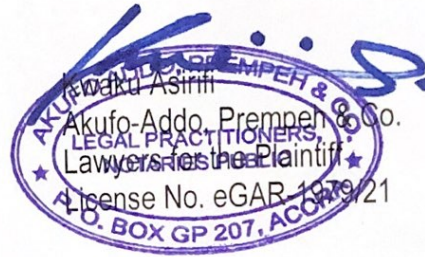
10. In their natural and ordinary meaning, the words complained of meant and were understood to mean that:
 - a. Even though Plaintiff is not the President of Ghana, he has at his disposal and use, the Presidential Jet (the Falcon) by virtue of his relationship as a brother to the President of Ghana.
 - b. Plaintiff at the expense of the state and the Ghanaian tax payer who bought and fuels the jet, uses the Presidential Jet for his personal business unrelated to the official state duties.
 - c. Plaintiff travelled on the Presidential Jet to Abuja for his personal business while the President of Ghana was in France on official duty.
 - d. Plaintiff uses and treats the Presidential Jet as if same were his family property.
 - e. Plaintiff's conduct is an affront to the Ghanaian public.
11. Plaintiff says that the words complained of are utterly false and a product of the Defendants' malicious imagination and were calculated solely to disparage him and bring his name into opprobrium.
12. Plaintiff says that save that the President of Ghana is his brother, he holds no public office and has never had personal use of the Presidential Jet (the Falcon).

13. Plaintiff says in point of fact that, even though members of his family played paramount roles in public service in Ghana, he has throughout his life endeavoured to live a private life devoid of public eyes and has succeeded until the impugned publication by the Defendants.
14. By reason of the impugned publication, Plaintiff's reputation and character has been severely damaged and he has suffered considerable embarrassment, emotional torment and distress. The Plaintiff has been brought into public odium and contempt.
15. Plaintiff says that the damage caused to his reputation is substantial as a result of his several years of education out of Ghana and extensive business dealings with partners outside Ghana.
16. Plaintiff says that the impugned publication by Defendants has received huge circulation on social media platforms causing Plaintiff to receive several calls from concerned friends, business partners and family members in the country and abroad.
17. In seeking aggravated damages, the Plaintiff shall contend and so prove that the Defendants in publishing or causing to be published the statements complained of, were actuated by malice, in that they knew the words complained of to be utterly false, yet, 1st and 2nd Defendants looked on as 3rd and 4th Defendants make the statements without exacting any form of proof.
18. Plaintiff says that 2nd Defendant particularly, repeated the impugned publication on another radio station and could not defend same when probed by the host.
19. Plaintiff says that unless otherwise restrained by this Honourable Court, Defendants will continue to publish similar and other defamatory statements about the Plaintiff.

WHEREFORE, Plaintiff claims against the Defendants jointly and severally as follows;

- a) Ten Million Ghana Cedis (GH¢10,000,000.00) damages for defamation contained in the publication by Defendants on 29/05/21 and more particularized in paragraph 9 of this Statement of Claim.
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- c) Perpetual injunction restraining the Defendants whether by themselves, their servants, agents or assigns from repeating same or other similar words of and concerning Plaintiff.
- d) Cost inclusive of legal fees.

DATED AT KWAKWADUAM CHAMBERS, ACCRA,
THIS 1ST DAY OF JUNE 2021



The Registrar
High Court
General Jurisdiction
Accra

AND FOR SERVICE ON THE ABOVE - NAMED DEFENDANTS