

24th January, 2022

The Judicial Board

Ghana Union of Professional Students

GUPS

Accra- Ghana

PETITION TO IMPEACH MR. STEPHEN ACQUAH THE PRESIDENT OF GHANA UNION OF PROFESSIONAL STUDENTS (GUPS)

1. The petitioner, **HARRIET LANYO ARYEH**, a student at **ACCRA BUSINESS SCHOOL**.
2. **ACCRA BUSINESS SCHOOL** is a member institution of GUPS and participated in the last annual congress of GUPS that elected its current National Executive Officers
3. The petitioners have inherent jurisdiction to defend the integrity of the constitution of GUPS and seek for its enforcement pursuant to Article 5(1) of the GUPS Constitution.
4. The petitioner invokes the explicit provisions of article 38 of the constitution, GUPS to commence the impeachment procedure of Mr. **Stephen Kwesi Acquah**, the GUPS President, for the stated misbehaviors as spelled out in Article 37 (a) (c) (d) and (e) as grounds for which an officer of GUPS shall be impeached.
5. That Mr. **Stephen Kwesi Acquah**, since his assumption as President has not submitted any program or project for the approval of by the General Assembly pursuant to Article 13(6) (b) and (c), yet have organized in the name of GUPS programs, received donations in the name of GUPS and expended same without the approval of any authority
6. That Mr. **Stephen Kwesi Acquah**, has embezzled, misused and misappropriated donations made to the Union by corporate institutions to the accounts of GUPS at Fidelity Bank Limited of Ghana (IPS Branch) to the tune of **Eighty Thousand Ghana**

Cedis (GH¢80,000) a copy of the Union's bank statement has been attached as **Exhibit A**.

7. Mr. **Stephen Kwesi Acquah** has also embezzled, misused and misappropriated donations (cash) for the Union without declaring and accounting for these donations.
8. That the actions of Mr. **Stephen Kwesi Acquah**, since becoming President of GUPS have been arbitrary without recourse to the tenants of the constitution and the limitations placed on the powers he purports to exercise by virtue of his office.
9. That the President of GUPS, have acted and continues to act in a manner which may bring or is likely to bring the name of the Union into disrepute, contempt or ridicule.
10. Mr. **Stephen Kwesi Acquah**, contracted Events4All, to organize the GUPS Awards as result of which sponsorship letters were sent to various corporate organizations such as Ghana Gas, DVLA and others. Consequently, a cheque (**Chq No. 180110000024**) was issued to the union by Ghana Gas Limited amounted to **Thirty thousand Ghana Cedis (GHS 30,000)**. Subsequently, Mr. Stephen Kwesi Acquah made known to the organizers in this case Events4All that the Finance officer of Ghana Gas Limited, demanded a **bribe of 10% (GHS 3,000)** of the aforesaid amount because he could issue the cheque to the Union. After several negotiations with Mr. Stephen Acquah, the organizers paid **One thousand and Ten Ghana Cedis (GHS 1,010)** through Mobile money to Mr. Stephen Kwesi Acquah for the issuance of a cheque donated by the company, in the name of the Union. The point must be underscored that these claims raise very serious criminal liabilities and may cause irreparable damage to the Union. *Evidence of payment* is attached as **Exhibit B**.
11. Through the actions, deliberate omissions and negligence of Mr. Stephen Acquah, he had arbitrarily contracted Events4All supply items and organize the GUPS PRO AWARDS and another organization held to supply citations, plaques and pens at the 3-Day Program. Nevertheless, Mr. the President didn't abide by the terms of these contracts and has refused the aforementioned organizations, whose

subsequently, have threatened to take legal actions against the union to retrieve money owed them from the said engagements and to restrain Mr. Acquah from peddling falsehood against them. *Copies of demand letters by these vendors are attached as Exhibit C and D.*

12. Mr. **Stephen Kwesi Acquah** purports to have made payments of forty thousand Ghana cedis to the administration of University of Professional Studies Accra (UPSA) for the use of its auditorium during a 3-day conference held in the school
13. Our independent checks reveal that no payment to that fact supra was made on behalf of the Union by Mr. **Stephen Kwesi Acquah** as he purports, yet, he has for the purpose drawn the said amount from the Union's account.
14. The President, Mr. **Stephen Kwesi Acquah**, during the 3-day program at UPSA appointed the Judicial Board Chairperson, Mr. **Prince A. A. Sadat** of GUPS to Chair and oversee the execution of the said event. *Appointment notice is attached as Exhibit E.*
15. The aforementioned misbehavior of the President is in clear contravention of the provisions of the constitution as captured in Article 37 (a) (c) (d) and (e) and are inconsistent with Article 17 of the GUPS constitution.
16. Consequently, we invoke Article 38 to commence the impeachment of Mr. **Stephen Kwesi Acquah** as his misbehavior makes him unfit to continue to hold himself as President of the largest Student Professional body in the Republic of Ghana.
17. As clearly stipulated in Article 38 (4) *"The Judicial Board shall have not more than two (2) weeks to conclude its sittings and come out with its independent opinion to the content of the petition"* we expect the Judicial Board to strongly uphold the provisions of the constitution, to protect the integrity of the Union.
18. We believe that the Judicial Board Chairperson, Mr. **Prince A. A. Sadat**, can't be reasonably expected to preside over this petition as he has by the president's appointment to chair and supervise the 3-day program inter alia, which form part of the issues arising out of this petition cannot be expected to superintend over the petition without bias.

19. In line with the principle of nemo judex in causa sua, which is a cardinal rule of natural justice, the Judicial Board Chairperson ought to recuse himself from the hearing as his supervision and involvement in the fact raised supra may come to question in delivering a fair and unbiased outcome.

20. Consequently, Pursuant to Article 38 (3) the deputy Judicial Board Chairperson must take over to ensure a fair and unbiased outcome.

21. The President must Pursuant to Article 38 (6) the President must recuse himself from duty and the Secretary proceeding to act in his stead to ensure that he does not act in a manner that compromises the outcome of the proceedings

Best Wishes,

A handwritten signature in black ink, appearing to read 'Harriet', with a small horizontal line underneath.

HARRIET LANYO ARYEH
PETITIONER

CC: The National Secretariat

NEC/GA

The Alumni

GUPS Patron