

WRIT OF SUMMONS

(Order 2 rule 3(1))

....2025 ..... SUIT NO WRIT ISSUED FROM. IN THE SUPERIOR COURT OF JUDICATURE IN THE HIGH COURT OF JUSTICE GENERAL JURISDICTION DIVISION KUMASI - A.D. 2025

BETWEEN

SAMSON LARDY ANYENINI C/0 H/NO. D36 DANSOMAN ACCRA

VRS-

WONTUMI MULTIMEDIA COMPANY LTD. (OPERATORS OF WONTUMI TV & WONTUMI RADIO) OLAM RD., ASOKWA, KUMASI

KWAKU KYEREMANTENG NKANSAH WONTUMI TV & RADIO OLAM RD., ASOKWA, KUMASI

KWAME BAFFOE ALIAS ABRONYE H/NO. D20/2, ODUMASE, SUNYANI PLAINTIFF SHALL DIRECT SERVICE

AN ACTION having been commenced against you by the issue of this Writ by the above-named plaintiff SAMSON LARDY ANYENINI

YOU ARE HEREBYCOMMANDED 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.

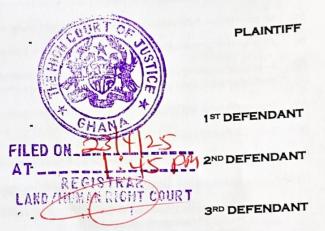
1. WONTUMI MULTIMEDIA COMPANY LTD.

- 2. KWAKU KYEREMANTENG NKANSAH
- 3. KWAME BAFFOE ALIAS ABRONYE

AND TAKE NOTICE that in default of your so doing, judgment may be given in your absence without further notice to you. 1. WONTUMI MULTIMEDIA COMPANY LTD. 2. KWAKU KYEREMANTENG NKANSAH 3. KWAME BAFFOE ALIAS ABRONYE

Dated this 27KD PRIL 20.25 day of P. BAFFOR-BONNIE **ACTING C.J** This writ is to be served within twelve calendar months from the date of issue unless, it is renewed within six Chief Justice of Ghana NB: 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 5 at the Kumasi A defendant appearing personally may, if he desire give notice of Registry of the Court of issue of the writ at

\*State name, place of residence or business address of plaintiff if known (not P. O. Box number). appearance by post. I trans of defendant (not P. O. Box number).



954 13 2025

# STATEMENT OF CLAIM

WHEREFORE Plaintiff claims against Defendants jointly and severally the following reliefs endorsed on the Writ of Summons:

- (i) A declaration that the complained broadcasts/publications by Defendants, endorsed on the Writ of Summons and particularised in the Statement of Claim, are defamatory of Plaintiff, and same have injured Plaintiff's hard-earned reputation.
- (ii) An order for an unconditional retraction, unqualified apology and complete removal from the internet of said defamatory broadcasts/publications, doing so on all of Defendants' platforms including their individual social media platforms, and in the Daily Graphic newspaper.
- (iii) An order for the publication as in relief (ii) to be carried out within 14 days from the day of judgment.
- (iv) An order for the publication as in relief (ii) to be given prominence on all said platforms for a period of one month.
- (v) An order that the contents of relief (ii) be subject to the prior approval of Plaintiff.
- (vi) An order of perpetual injunction restraining Defendants whether by themselves or their agents, assigns or servants from any further publication of said complained defamatory statements.
- (vii) General damages of GHC 5,000,000.00 for injury to reputation against 1<sup>st</sup> Defendant.
- (viii) General damages of GHC 2,000,000.00 for injury to reputation against 2<sup>nd</sup> Defendant.
- (ix) General damages of GHC 4,000,000.00 for injury to reputation against 3<sup>rd</sup> Defendant.
- (x) Punitive and exemplary damages of GHC 6,000,000.00 for malicious and reckless publication against 1<sup>st</sup> Defendant.
- (xi) Punitive and exemplary damages of GHC 3,000,000.00 and GHC 5,000,000.00 for malicious and reckless publication against 2<sup>nd</sup> and 3<sup>rd</sup> Defendants respectively.
- (xii) Costs, including legal fees and cost of the suit.
- (xiii) Further or other reliefs as the Court may deem fit.

This Writ was issued by A-PARTNERS @ LAW

Whose address for service is PLOT NO. D36 DANSOMAN HOUSING ESTATE, ADOTED MINGLE ST., GHANAPOST GPS GA-565-0851, OPP. NEW CENTURY CAREER TRAINING INSTITUTE, BY DANSOMAN CLUSTER OF SCHOOLS, SAHARA-DANSOMAN, ACCRA.

Lawyer for the Plaintiff ETORNAM CALEB AFUTU, ESQ. SOL. ILC:: NO. eGAR04089/25 SOL. TIN: GHA-0024164010-0 CH. REG. NO.: ePP00168/24 FIRM TIN: C0003203867 FIRM BP 3000025470 A-PARTNERS @ LAW SOLICITORS FOR PLAINTIFF

Who resides at ACCRA

Endorsement 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 liquidated 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 DIVISION KUMASI – A.D. 2025

URE FILED ON 23 425 AT REGISTRAR LAND HUMAN RIGHT COURT SUIT NO. GJ 42004

SAMSON LARDY ANYENINI C/O H/NO. D36 DANSOMAN ACCRA -VRS-

WONTUMI MULTIMEDIA COMPANY LTD. (OPERATORS OF WONTUMI TV & WONTUMI RADIO) OLAM RD., ASOKWA, KUMASI

KWAKU KYEREMANTENG NKANSAH WONTUMI TV & RADIO OLAM RD., ASOKWA, KUMASI

KWAME BAFFOE ALIAS ABRONYE H/NO. D20/2, ODUMASE, SUNYANI 1ST DEFENDANT

PLAINTIFF

2NDDEFENDANT

**3**RDEFENDANT

### INDORSEMENT ON WRIT OF SUMMONS: WORDS DEFAMATORY OF PLAINTIFF BROADCASTED AND PUBLISHED AND/OR CAUSED TO BE BROADCASTED AND PUBLISHED BY DEFENDANTS ON APRIL 7, 2025

- a. ...That thief at Joy FM ... (Host laughs)... He is a thief. He was given 50,000 Friday night... \$50,000 to call Ntim Fordjour on News File and disgrace him.
- b. I have already told you that Sampson (Inaudible name) is a liar. His law job does not pay him much. So, he just moves from one Minister to another and collects money from them.
- c. He' produced fake text messages according to Ntim Fordjour... He's dishonest... Yes, he is dishonest according to Rev. Ntim Fordjour.... oh, then he's a thief!... then he's still a thief... that's it... If you agree with me, then that's it. Listen, they gave him \$50,000 so that, that very Saturday, he will call Ntim Fordjour and disgrace him.
- d. Sampson himself took his own phone and drafted the messages on Friday evening. He and the NDC people who gave him the money and drafted the message on WhatsApp.
- e. Now, on Saturday, people from America and all over were calling me and saying, "Ei, that man you called a thief from the News File is indeed a thief". Because we were all watching on Facebook, and the messages he was reading were not available till now....
- f. They were messages on his phone... he was reading from his phone, which had been drafted for him from the chat section of those who gave him the

money, so that Ghanaians would believe there is no truth in what Reverend said.

- g. It is the Holy Spirit that inspired the producers to forward the messages to the Reverend. As a result of that, Ghanaians got to know that Sampson had taken a bribe to produce his own messages. The reason why his law firm is no longer active, and his books are covered in dirt, is that when he goes to court, he doesn't win any case. So, he lives off the News File, so when he goes around collecting his bribes, then on Saturdays, he says I will do the work for you. Any case that Sampson (Inaudible name) is seriously involved with means some negotiations have taken place ... he's sold the case because Kwaku Sakyi Addo never did such. He doesn't sell the show for money. But I'm saying on authority that Sampson could sell the Saturday programme and get more money than Joy FM itself could get from adverts in 6 months... The bribe he takes on one Saturday will be more than the money Joy FM will make from adverts in six months. He goes to take it secretly and comes to sit innocently on the programme. The producers got to know the he had sold the show, and therefore they decided that if you've gone to take the bribe alone, I'm telling you that when the producers saw that he was reading text messages that weren't from them, they had a gut feeling that he had done something fishy and decided to expose him ...
- h. And the producers are saying if you have sold the programme...and you always sell the programme and pocket the money... you sell the programme and pocket the money, then we will produce the real message. As for Sampson, the News File should charge him for advertising because he has sold the programme to all the panel members coming to the programme...
- i. So, if you have sold the programme, we will also make the truth prevail. He has wicked intentions. No wonder he is not even able to win the simplest of cases... the simplest of cases... Because he has no knowledge of the law profession. And by kind courtesy of cheap suits sold at Kantamato...
- j. Your command of the English language often falters there; why? ... Why? Because his mind is corrupt...

### IN THE SUPERIOR COURT OF JUDICATURE IN THE HIGH COURT OF JUSTICE GENERAL JURISDICTION DIVISION KUMASI – A.D. 2025

SUIT NO. . GJ/ /2025

REGISTRAR

KUMASI

PLAINTIFF

SAMSON LARDY ANYENINI C/O H/NO. D36 DANSOMAN ACCRA

-VRS-

WONTUMI MULTIMEDIA COMPANY LTD. (OPERATORS OF WONTUMI TY & WONTUMI RADIO) OLAM RD., ASOKWA, KUMASI

KWAKU KYEREMANTENG NKANSAH WONTUMI TV & RADIO OLAM RD., ASOKWA, KUMASI

KWAME BAFFOE ALIAS ABRONYE H/NO. D20/2, ODUMASE, SUNYANI 3RD DEFENDANT

2NDDEFENDANT

PLAINTIFF SHALL DIRECT SERVICE

#### STATEMENT OF CLAIM

- 1. Plaintiff has been the substantive host of NewsFile since resigning from the employ of the Multimedia Group Limited sometime after being called to the Bar in 2010 whereupon he began active practice as a Lawyer.
- 1<sup>st</sup> Defendant is incorporated under the laws of Ghana and operates the radio and television stations known as Wontumi TV and Wontumi 101.3 FM, all in the jurisdiction of this Court.
- 2<sup>nd</sup> Defendant is engaged by 1<sup>st</sup> Defendant as host of a programme by name *The Ghana Talk Show* simulcast on said radio and television stations and streamed and uploaded on virtual platforms including WONTUMI TV LIVE on YouTube, Facebook and <u>www.wontumionline.com</u>.
- 4. 3<sup>rd</sup> Defendant is the Bono Regional Chairman of the New Patriotic Party, a regular guest on 1<sup>st</sup> Defendant's media platforms and whose interviews are often culled for publication by other news media including www.ghanaweb.com.
- On Monday the 7<sup>th</sup> day of April, 2025, 3<sup>rd</sup> Defendant, regularly in the jurisdiction of this Court, was guest on 1<sup>st</sup> Defendant's said programme on said TV and Radio platforms where he uttered defamatory statements about Plaintiff.

6. The defamatory statements were uttered with *malice aforethought* with 2<sup>nd</sup> Defendant actively contributing and encouraging 3<sup>rd</sup> Defendant to continue in the conduct while occasionally play-acting to urge restraint, neither sincerely disclaiming nor requiring retraction and apology as expected by the standard ethics in the exercise of professional journalism.

## PARTICULARS OF MALICE

- Paragraphs 6, 13, 15 and 21 together with its subparagraphs herein are repeated.
- (ii) Paragraphs 9 and 11 together with the subparagraphs therein, especially subparagraph (e) of paragraph 11 are also repeated.
- (iii) 3<sup>rd</sup> Defendant had previously made similar statements broadcast/published by 1<sup>st</sup> and 2<sup>nd</sup> Defendants in similar fashion.
- (iv) 1<sup>st</sup> and 2<sup>nd</sup> Defendants encourage and enable 3<sup>rd</sup> Defendant in making for broadcast/publication said defamatory statements without restraint or any effort whatsoever at verifying same.
- 1<sup>st</sup> Defendant's news media has wide reach relying also on the numerous virtual platforms as it did use on said day to give audiences anywhere in the world access to its broadcast of the defamatory content.
- In fact, <u>www.ghanaweb.com</u> also recklessly culled a publication from said defamatory statements and published same on Tuesday the 8<sup>th</sup> day of April 2025 with the heading "NDC allegedly paid Samson Anyenini \$50,000 in 'showdown' on Newsfile with Ntim Fordjour Abronye DC." without any attempt at verifying the allegations.
- Further to paragraph 8 above, the particulars of said publication, though subsequently deleted upon indication of a suit by Plaintiff, included the following:

#### PARTICULARS OF PUBLICATION BY GHANAWEB

- i. The Bono Regional Chairman of the New Patriotic Party (NPP), Kwame Baffoe, popularly known as Abronye DC, has made allegations against legal practitioner and journalist, Samson Lardy Anyenini.
- *ii.* He claims that the National Democratic Congress (NDC) paid Anyenini \$50,000 to downplay the ongoing cocaine plane saga and publicly discredit the Member of Parliament for Assin South, Rev John Ntim Fordjour.
- iii. That thief at Joy FM ... (Host laughs)... He is a thief. He was given 50,000 Friday night... \$50,000 to call Ntim Fordjour on News File and disgrace him.

- iv. Speaking during an interview on Wontumi TV on April 7, 2025, Abronye accused the journalist of colluding with unnamed NDC members to undermine Rev Fordjour's credibility during a recent appearance on JoyNews' Newsfile programme.
- v. "Samson Anyenini was given \$50,000 to disgrace Ntim Fordjour. He was tasked with calling Ntim Fordjour onto the show and doing everything possible to discredit him and water down the cocaine saga.
- vi. "He even prepared messages with the NDC members who gave him the money and read those messages on air," Abronye alleged...
- 10. The defamatory statements by Defendants about Plaintiff are contained in a 1:41:10 recording of said programme (15 minutes - from the 29<sup>th</sup> - the 44<sup>th</sup> minutes or thereabouts) as translated and transcribed by the Ghana Institute of Languages Transbureau.
- 11. The defamatory words, mostly in Twi, among other comments translate in the English language essentially as follows:

# PARTICULARS OF DEFAMATORY STATEMENTS BY DEFENDANTS

- a. That thief at Joy FM ... (Host laughs)... He is a thief. He was given 50,000 Friday night... \$50,000 to call Ntim Fordjour on News File and disgrace him.
- b. I have already told you that Sampson (Inaudible name) is a liar. His law job does not pay him much. So, he just moves from one Minister to another and collects money from them.
- c. He produced fake text messages according to Ntim Fordjour... He's dishonest... Yes, he is dishonest according to Rev. Ntim Fordjour.... oh, then he's a thief!... then he's still a thief... that's it... If you agree with me, then that's it. Listen, they gave him \$50,000 so that, that very Saturday, he will call Ntim Fordjour and disgrace him.
- d. Sampson himself took his own phone and drafted the messages on Friday evening. He and the NDC people who gave him the money and drafted the message on WhatsApp.
- e. Now, on Saturday, people from America and all over were calling me and saying, "Ei, that man you called a thief from the News File is indeed a thief". Because we were all watching on Facebook, and the messages he was reading were not available till now....
- f. They were messages on his phone... he was reading from his phone, which had been drafted for him from the chat section of those who gave him the money, so that Ghanaians would believe there is no truth in what Reverend said.
- g. It is the Holy Spirit that inspired the producers to forward the messages to the Reverend. As a result of that, Ghanaians got to know that

Sampson had taken a bribe to produce his own messages. The reason why his law firm is no longer active, and his books are covered in dirt, is that when he goes to court, he doesn't win any case. So, he lives off the News File, so when he goes around collecting his bribes, then on Saturdays, he says I will do the work for you. Any case that Sampson (Inaudible name) is seriously involved with means some negotiations have taken place... he's sold the case because Kwaku Sakyi Addo never He doesn't sell the show for money. But I'm saying on did such. authority that Sampson could sell the Saturday programme and get more money than Joy FM itself could get from adverts in 6 months... The bribe he takes on one Saturday will be more than the money Joy FM will make from adverts in six months. He goes to take it secretly and comes to sit innocently on the programme. The producers got to know the he had sold the show, and therefore they decided that if you've gone to take the bribe alone, I'm telling you that when the producers saw that he was reading text messages that weren't from them, they had a gut feeling that he had done something fishy and decided to expose him ...

- h. And the producers are saying if you have sold the programme...and you always sell the programme and pocket the money... you sell the programme and pocket the money, then we will produce the real message. As for Sampson, the News File should charge him for advertising because he has sold the programme to all the panel members coming to the programme...
- i. So, if you have sold the programme, we will also make the truth prevail. He has wicked intentions. No wonder he is not even able to win the simplest of cases... the simplest of cases... Because he has no knowledge of the law profession. And by kind courtesy of cheap suits sold at Kantamato...
- *j.* Your command of the English language often falters there; why? ... Why? Because his mind is corrupt.
- 12. Plaintiff, his family, friends and associates, clients, well-wishers and persons making direct contact with him for the very first time were stunned to hear the complained defamatory statements of outright falsehoods by Defendants.
- 13. Plaintiff shall contend, at trial, that the complained defamatory statements were calculated to cause maximum damage to Plaintiff's hard-earned reputation and professional standing, and that same were circulated to and accessed by a large mass of unquantified number of viewers and readers worldwide to achieve the purpose of the broadcast/publication.
- 14. Plaintiff shall contend further that said false and defamatory broadcast/publication inspired, motivated and attracted similar comments from followers of Defendants including on social media with rebroadcasts/republications by various bloggers without care to verify the comments.

- 15. Plaintiff shall contend further that said false and defamatory broadcasts/publications, as particularised herein, held Plaintiff out as a thief, a liar, a corrupt person and one in the habit of and engaging in or involvement in the criminal acts of bribery, extortion and unethical or unprofessional conduct in his practice of journalism and law, and that same were understood to refer to Plaintiff.
- 16. That said defamatory broadcasts/publications, understood to refer to Plaintiff, were disseminated to a substantial number of unquantifiable persons through the internet including Facebook, and Defendants' followers and other persons continue to further propagate the defamatory comments.
- 17. Plaintiff is of high moral character and proven integrity and has built an exceptional personal and professional reputation on the back of which friends, associates and respected lawyers and judges have repeatedly urged he joins the bench.
- 18. Plaintiff has interacted and interfaced with a large mass of unquantified number of people globally including through his NewsFile programme (which he has played host since 2008 and as substantive host since 2013), and that his conduct, both private and public, leaves his family, friends, associates and well-wishers an expectation contrary to the complained comments and publication.
- 19. Plaintiff, inter alia, shall rely on the following to assert said reputation for damages:

# PARTICULARS OF PROFESSIONAL REPUTATION

- Plaintiff was in Christian leadership throughout his senior secondary and first degree education, having been brought up as a devotee in a fashion taught in church and the Scripture Union.
- Plaintiff underwent training and was a preacher, part of a team including from the USA evangelising in various parts of the country, and also working for the Scripture Union and the Bible Society.
- Plaintiff worked as a pupil teacher, and later as a journalist including as correspondent for the BBC African Service.
- Plaintiff co-founded A-PARTNERS @ LAW after resigning from Multimedia Group Limited as News Editor soon upon being called to the Bar and later from GAISIE ZWENNES HUGHES & CO.
- Plaintiff's LL.B is his second degree and he has an LL.M and only recently paused a PhD in Law studies.
- Plaintiff has represented, assisted to advice, and represents/advises numerous clients local and foreign, and has successfully conducted some landmark cases.
- Plaintiff has consulted for and delivered special papers for professional institutions and special organizations including the UNESCO, the Judicial

Service of Ghana, the Ghana Audit Service, the Ghana Integrity Initiative (now Transparency International Ghana) and the Ghana Anti-Corruption Coalition, CDD-Ghana/CODEO.

- 8) Plaintiff has collaborated with the Judicial Service, CHRAJ, NCCE, CDD-Ghana, GII, GACC, CHRI-Ghana and others to promote good governance, and was a major crusader for the passage of the Right To Information Act, and originator of the campaign against a referendum to make the office of DCEs elective by political partisanship.
- 9) Plaintiff has been legal counsel for/served/serves on committees/boards including of the University of Education – Winneba, Law School and School of Languages of the University of Ghana, Chairman of the GFA NC Disciplinary C'ttee.
- 10) Plaintiff was one of two Africans appointed to the Board of International Lawyers Assisting Workers (ILAW) Network headquartered in Brussels.
- 11) Plaintiff has consulted for media organisations and projects including Reporters Without Borders, DW Akademie, MFWA, provided tailored training for practitioners and staff including of the Graphic Communications Group Limited and the Multimedia Group Limited.
- 12) Plaintiff has for many years been involved in training professionals including journalists and lawyers, including through internship and pupillage for law students and those freshly called to the Bar.
- 13) Plaintiff has been invited to contribute to course modules and as guest lecturer at faculties (esp. of law) at home and abroad including University of Ghana, GIMPA, UPSA and Smith College (Northampton, MA).
- 14) Plaintiff has received awards including being adjudged the GJA Journalist of the Year – 2019 and Journalist of the Year – 2022 by the Millennium Excellence Foundation.
- 15) Plaintiff is a fellow of the African Leadership Initiative West Africa and the ASPEN Global Leadership Network.
- 16) Plaintiff has been Publicity Secretary of the African Bar Association (AFBA) - Ghana Chapter.
- 20. Plaintiff shall contend that while he has assured his associations above and the public generally that he was on the occasion only exercising his profession by probing a serious allegation, the complained comments and publications have injured his reputation despite same being completely false.
- 21. Plaintiff shall contend that the complained comments and publications diverted his attention affecting his valuable billable hours of work including preparation for lectures to be presented at the University of Ghana while attending to concerns about same and working on repairing the damage caused.
- 22. Further to paragraph 21 above, Plaintiff lost focus in meeting a crucial deadline and lost out on an ongoing consultancy procurement process by a reputable international body for which he could have earned several hundred of Euros daily over a month.

- 23. Further to paragraph 22 above, Plaintiff on that 7<sup>th</sup> day of April, 2025 when the defamatory broadcasts were carried, had actually received correspondence regarding said consultancy to partner an international consultant, and for which he was headhunted more or less.
- 24. Plaintiff will rely on the following facts and matters in support of a claim for damages, including punitive damages for defamation:

# PARTICULARS OF DAMAGES

- The complained defamatory broadcasts/publications were made by Defendants maliciously or recklessly not caring to verify their truth or accuracy.
- (ii) The complained defamatory broadcasts/publications were made by Defendants knowing fully well or without reasonable basis to believe they were not false.
- (iii) The complained defamatory broadcasts/publications were made without any regard whatsoever for the damage to Plaintiff's reputation.
- (iv) Defendants have caused grave damage to Plaintiff's reputation, as right-thinking people have, in spite of Plaintiff's denial, continued to rely on same broadcasts/publications to pour scorn on and holding Plaintiff as incompetent, unethical, unprofessional, corrupt, a criminal/criminally-minded and a dishonest person among the meanings in paragraph 15 above.
- (v) 1<sup>st</sup> and 2<sup>nd</sup> Defendants made the complained defamatory broadcasts/publications spurning basic journalistic etiquettes and professional conduct.
- 25. Plaintiff shall rely on the above, audio-visual recordings, print and such ocular evidence of the matters aforesaid and associated certified transcriptions and translations to contend that he is deserving of reliefs including damages for the tort committed against him by Defendants.
- 26. Plaintiff shall contend that the complained defamatory broadcasts/publications were unmistakably understood by right-thinking members of society to refer to Plaintiff and that same have reduced Plaintiff in the estimation of right-thinking members of society.
- **WHEREFORE** Plaintiff claims against Defendants jointly and severally the following reliefs endorsed on the Writ of Summons:

(i)

- A declaration that the complained broadcasts/publications by Defendants, endorsed on the Writ of Summons and particularised in the Statement of Claim, are defamatory of Plaintiff, and same have injured Plaintiff's hard-earned reputation.
- An order for an unconditional retraction, unqualified apology (ii) and complete removal from the internet of said defamatory broadcasts/publications, doing so on all of Defendants' platforms including their individual social media platforms, and in the Daily Graphic newspaper.
- An order for the publication as in relief (ii) to be carried out (iii) within 14 days from the day of judgment.
- An order for the publication as in relief (ii) to be given (iv)prominence on all said platforms for a period of one month.
- An order that the contents of relief (ii) be subject to the prior (v) approval of Plaintiff.
- An order of perpetual injunction restraining Defendants whether (vi) by themselves or their agents, assigns or servants from any publication of said complained defamatory further statements.
- General damages of GHC 5,000,000.00 for injury to reputation (vii) against 1<sup>st</sup> Defendant.
- General damages of GHC 2,000,000.00 for injury to reputation (viii) against 2<sup>nd</sup> Defendant.
- General damages of GHC 4,000,000.00 for injury to reputation (ix)against 3rd Defendant.
- Punitive and exemplary damages of GHC 6,000,000.00 for (x) malicious and reckless publication against 1st Defendant.
- Punitive and exemplary damages of GHC 3,000,000.00 and GHC (xi)5,000,000.00 for malicious and reckless publication against 2<sup>nd</sup> and 3<sup>rd</sup> Defendants respectively.
- Costs, including legal fees and cost of the suit. (xii)
- (xiii) Further or other reliefs as the Court may deem fit.

# DATED AT A-PARTNERS @ LAW, ANYENINI CHAMBERS, PLOT NO. D36 DANSOMAN HOUSING ESTATE, ADOTEY MINGLE ST., GHANA POST GPS GA-565-0851, OPP.

NEW CENTURY CAREER TRAINING INSTITUTE, BY DANSOMAN CLUSTER OF SCHOOLS, SAHARA - DANSOMAN, ACCRA, THIS 17H DAY OF APRIL 2025.



ETORNAM CALEB AFUTU, ESQ. SOL. LIC.: NO. eGAR04089/25 SOL. TIN: GHA-00241640100 CH. REG. NO.: ePP00168/24 FIRM TIN: C0003203867 FIRM BP 3000025470 A-PARTNERS @ LAW SOLICITORS FOR PLAINTIFF

THE REGISTRAR HIGH COURT OF JUSTICE GENERAL JURISDICTION DIVISION – KUMASI

AND FOR SERVICE ON THE ABOVE-NAMED DEFENDANTS:

- WONTUMI MULTIMEDIA COMPANY LTD. (OPERATORS OF WONTUMI TV & WONTUMI RADIO) OLAM RD., ASOKWA, KUMASI
- KWAKU KYEREMANTENG NKANSAH WONTUMI TV & RADIO OLAM RD., ASOKWA, KUMASI
- KWAME BAFFOE ALIAS ABRONYE H/NO. D20/2, ODUMASE, SUNYANI