

REGISTRAR
HIGH COURT
ACCRA



WRIT OF SUMMONS
(Order 2 rule 3(1))

WRIT ISSUED FROM ACCRA 27/08/2025 SUIT No. EJ/1125/2025

IN THE HIGH COURT OF JUSTICE
ACCRA

BETWEEN

DR. RANSFORD ANERTEY ABBEY
Cocoa House, 41 Kwame Nkrumah Avenue
Accra

PLAINTIFF

AND

KWAME BAFFOE ALIAS ABRONYE

DEFENDANT

(Plaintiff shall direct service)

To
AN ACTION having been commenced against you by the issue of this writ by the above-named Plaintiff DR. RANSFORD ANERTEY ABBEY

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 KWAME BAFFOE ABRONYE

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

Dated this 26th day of

Aug.

2025

Chief Justice of Ghana

P. BAFFOE-BONNIE
(AG, CHIEF JUSTICE)

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 5 at the Registry of the Court of issue of the writ at ACCRA. A defendant appearing personally may, if he desire give notice of appearance by post.

SEALED

*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).

HIGH COURT ACCRA

FORM 1

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STATEMENT OF CLAIM
WORDS DEFAMATORY OF PLAINTIFF
BROADCASTED AND PUBLISHED AND/OR CAUSED TO BE
BROADCASTED AND PUBLISHED BY THE DEFENDANT ON 23RD AUGUST 2025

Particulars of Defamation pursuant to Order 57 Rule 2 of C.I 47 are endorsed as follows:

"Nyɛ wawa sɛ Randy Abbey ɔɔko inspection ewo cocoa farm a ɔsoa akɔnyua edi firi Accra na ɔde aka na w'ako ako tɛna so Randy Abbey for you, dwɛɛ ne ahantan because cocoa fuo no wɔmo na etua Randy Abbey ka no wɔ mo akɔnyua no Randy Abbey antenna so, antena so ɔmo akɔnyua no ɛtan...

Randy Abbey naa ɔyɛ COCOBOD Chief Executive Officer no o, ɔɔko cocoa farmers no ho a, ɔsoa akɔnyua firi ne office Accra na Land Cruiser a separate Land cruiser, asoa akɔnyua no, a Land cruiser o asoa a Land Cruiser nkoaa fa Randy Abbey akɔnyua na ako Ghana COCOBOD atɔ petrol agu land cruiser naa ekuta CEO no akɔnyua no na CEO no nso land cruiser baako na personal aid foɔ nso land cruiser baako, na n'akɔnya nso afa land cruiser baako, na cocoa akuafoɔ no a y'afa ɔmo sika edie no, yɛ di ɔmo sika atɔ petrol agu saa land cruiser wei nyinaaa mu. Na ɔde ako cocoa farm ho. Nti ɔduru a na yɛ yi n'akɔnyua abɛ si ho na w'atɛna ase because cocoa kuafoɔ no a wɔmo na edi cocoa ba ma yɛdi tua ne ka, ne sisi noa akyia no, yɛdi tua ne ka, wɔmo akɔnyua no ɛso ɛtan nti antenna so. That is Randy Abbey for you.....

Na CEO a ɔɔko cocoa kuani no ho akɛta n'akɔnyua dea wo firi sɛ saa CEO no ɔɛbu wo sɛ wo cocoa kuani no yɛ yie? ɔbɛ dwene woo ho sɛ yɛ yie? daabi ɔndweni wo ho....

Ena baako aba sɛɛ n'aban na aba ena Randy Abbey akɔfa no aba sɛ "wodie yɛ firi sɛ wo yɛ NDC nii nti yɛ ni wo ɛtumi abo korɔnoo because ɔmo a ɔɔmo wɔ ho no me nagyi ɔmo ndi, nti sika a ɛɛ sɛ ne wia no, me ntumi nwia nti ma me mfa another Director of Finance mmra na me ns no nwia sika"

Die enti a Randy Abbey asesa Director of Finance ama n'akɔtɛna fie eni sɛɛ ɔpɛ nɛɛ ɔni no ɛɛ wia sika. Nyi w'ako akɔfa ɔnoo ni ho nipa edi no aba aba abɛyɛ no Director of Finance. Nti ɔne no na ɛɛtumi awia COCOBOD sika no at the detriment of the poor cocoa farmer because w'aba nti ɔpɛ sika ako fie. Nti Director noa na ɔwɔ ho na na ɔyɛ Director of Finance no ɔnko tɛna fie bosome ɔɔngye n'akatua mɛ appoint another Director of Finance na yɛ di the same cocoa akuafoɔ no a mo see cocoa boɔ nnye nti no ɔmo rigye 128 Ghana cedis mo ntie ne, cocoa akuafoɔ mo ntie me, Randy Abbey for you. ɔɔɔa boɔ no a ɛnye no Director of Finance sɛ ɔgye 18000 a month a plus allowances ni biibibiaa a ɛnko si 25000 no, wɔ ti fie. 250million bosome ni n'allowances a ne fuel allowances ne nyinaa no ɔti fie."

The words translated in English are as follows:

"Is it not surprising that when Randy Abbey goes for inspection on the cocoa farms, he has a chair he brings from Accra that he sits on it. That is Randy Abbey for you. Pride and arrogance, because the cocoa farmers who pay Randy Abbey, Randy would not sit on their chair because it is ugly.

Randy Abbey is the CEO of COCOBOD, when he is going to see the cocoa farmers, he carries a chair from his office in Accra inside a land cruiser, a separate land cruiser for the chair that carries Randy Abbey's chair, Ghana COCOBOD buys petrol into that land cruiser. So the CEO has one Land Cruiser, his personal aide also has one Land Cruiser and his chair also takes one Land Cruiser. And the cocoa farmers whose monies have been spent, it is their monies that are used to buy petrol for these Land

Cruisers and that is what he takes to the cocoa farms. So when he gets there, they then remove the chair so that he can sit on it because the cocoa farmers who farm the cocoa so that he can be paid his crooked waist, that is what they use to pay him, their chair is very ugly so he cannot sit on it. That is Randy Abbey for you.

A CEO who when he visits the cocoa farmers has his own chairs, do you think he would respect you the cocoa farmers? or think about you for you to prosper? No he would not think about you.

The phenomenon now is that my government is in power and so Randy has brought someone "you, we believe that you are a proper NDC so we can work with you to steal because those who were here previously, I do not trust them, so the money that I want to steal, I cannot steal it so let me take another Director of Finance so that we can steal money". The reason why Randy Abbey has changed the Director of Finance and told him to go and stay at home is that he wants someone he can steal money with so he has gone to take his own personal preference and made the person Director of Finance because he is the one he can steal COCOBOD money with to the detriment of the poor cocoa farmer because he has come to steal money and go home. So the former Director who was there as the former Director of Finance, was told to go and stay home for a month and receive pay whilst another Director of Finance is appointed and the same cocoa farmers who you told that the price of cocoa is not good so they should take 128 Ghana cedis (listen to me cocoa farmers, listen to me) Randy Abbey for me. The cocoa price that you said is not good, the Director of Finance takes 18,000 a month plus allowances and everything costs around 25,000, he is at home. 250 million a month in allowances together with fuel allowance despite all these he is sitting at home."

The Plaintiff claims against the Defendant the following reliefs:

- a. A declaration that the complained broadcasts/ publications by the Defendant 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.
- b. An order for an unconditional retraction, unqualified apology and complete removal from the internet of the said defamatory broadcasts/publications doing so on all of the Defendant's platforms including his social media platforms.
- c. An order for the publication as in relief (b) to be carried out within 14 days from date of judgment.
- d. An order for the publications as in relief (b) to be given prominence on all said platforms for a period of one (1) month.
- e. An order that the contents of relief (b) be subject to the prior approval of the Plaintiff.
- f. An order of perpetual injunction restraining the Defendant either by himself or his agents or assigns from further publishing and or broadcasting and or

distributing films and or videos containing the following defamatory words or like words.

- g. General damages in the amount referred to in paragraph 34 of the Writ of Summons against the Defendant in favour of the Plaintiff for the defamatory publications or broadcasts posted by the Defendant online.
- h. Punitive damages against the Defendant in favour of the Plaintiff as punishment for the defamatory broadcasts/publications made online.
- i. Compensatory damages against the Defendant in favour of the Plaintiff as punishment for the defamatory broadcast/publication made online.
- j. Costs including legal fees
- k. Any other order(s) that this Honourable Court may deem fit to make in the circumstances.

This writ was issued by **LEGAL DEPARTMENT, COCOBOD.**
whose address for service is **Cocoa House, 41 Kwame Nkrumah Avenue**
Accra

Agent for
Address Number and date of lawyer's e

Lawyer for the plaintiff resides at **ACCRA**
.....

Indorsement to be made
This writ was served
on the defendants

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).

Words or

Filed on 26/08/25
at 3:00 [Signature] am/pm
Registrar
GENERAL JURISDICTION LCC-ACCRA

IN THE SUPERIOR COURT OF JUDICATURE
IN THE HIGH COURT OF JUSTICE
ACCRA-A.D.2025

SUIT NO:

DR. RANSFORD ANERTEY ABBEY
Cocoa House, 41 Kwame Nkrumah Avenue
Accra

PLAINTIFF

Vrs

KWAME BAFFOE ALIAS ABRONYE
H/No. D20/2, Odumase
Sunyani

DEFENDANT

Plaintiff shall direct service

STATEMENT OF CLAIM

1. The Plaintiff, a citizen of the Republic of Ghana, and presently the acting Chief Executive of the Ghana Cocoa Board.
2. The Defendant is presently the Bono Regional Chairman of the New Patriotic Party (NPP), the largest opposition party in Ghana and operates OHIA TV, an online television station with a very wide circulation and accessed both locally and abroad.
3. The Plaintiff avers that his professional career commenced with his occupation of various positions spanning from Director of News, Current Affairs and Sports at Metro Tv from September 2001 to December 2002 and held the same position as Director of News, Current Affairs and Sports at Metro Tv from 2001 to 2003, General Manager of Choice FM from February 2003 to June 2005.
4. The Plaintiff known for his football acumen was the Non -Executive Director of the Ghana Football Association (GFA) from 2006 to 2015.
5. The Plaintiff was also Concept Developer and Host of Good Morning, Ghana at Metro Tv from January 2002 to January 2025 and a Non-Executive Director of Metro Tv from 2017 to date

6. He was also the Board Chairman of the Peduase Valley Resort (4 Star Resort) from January 2016 to Date, President and owner of the Heart of Lions FC Limited from January 2014 to date. Board Chairman of Commercial and Allied Services Cluster, JGC from January 2022 to June 2023, Managing Director of Ignite Media Group from February 2022 to December 2024 until his recent appointment as acting Chief Executive Officer in January 2025.
7. The Plaintiff, with a professional career spanning twenty (20) years at a managerial level has achieved a number of academic laurels. He holds a Doctorate Degree in Business Administration from the Swiss Business School, Switzerland, a master's degree in applied business research from the Swiss Business School, Switzerland.
8. The Plaintiff also holds a Post-graduate Certificate in Contemporary Management from the Nobel International Business School, a Masters Degree in Business Administration (General Management) from the Australian Institute of Business, Australia, a Post-graduate Diploma in Management from the Australian Institute of business, Australia, a Post-graduate Certificate in Management from the Australian Institute of Business, Australia, a certificate in Human Resources Management from the Ghana Institute of Management and Public Administration and Advance Certificate in Public Relations, Advertising and Marketing from the Ghana Institute of Journalism.
9. The Plaintiff holds a professional qualification as an Accredited Public Relations Practitioner from the Institute of Public Relations, Ghana, an Executive Master of Appropriate Dispute Resolution from Gamey & Gamey Academy, an affiliate of Pulse Institute, Calgary-Canada and an Executive Diploma in Appropriate Dispute Resolution from Gamey & Gamey, an affiliate of Pulse Institute, CALGARY-Canada.
10. The Plaintiff belongs to a number of professional bodies including the Institute of Public Relations, the Chartered Institute of Governance and Leadership and the Ghana Journalists Association. Plaintiff is currently the President of Heart of Lions FC Limited, he is also the Board Chairman of Peduase Valley Resort (4 Star Resort), the Executive Council Member of Ghana Football Association and a member of

the Club Licensing and Competition Committee of the Confederation of African Football (CAF).

11. The Plaintiff says that by virtue of the positions he has occupied and presently occupies, he is well known both in Ghana and internationally as an accomplished professional and definitely not an embezzler, a dishonest and or fraudulent person and or a thief.
12. The Plaintiff says that OHIA TV has on its programme schedule, a show known as "The Evidence", which is broadcast in both English and Twi languages.
13. The Plaintiff says that whilst the English language is the official language of Ghana and also a language which is globally spoken and or understood the Twi language is either spoken and or understood by a significant majority of persons living and or residing in Ghana and or of Ghanaian heritage or percentage worldwide.
14. The Plaintiff says that by virtue of OHIA TV being on internet platforms such as YouTube, Facebook and TikTok, OHIA TV has a permanent presence worldwide and all its programmes are broadcast to the whole world and can be accessed on any smart electronic device including mobile phones and tablets.
15. The Plaintiff says that on the 23rd day of August, 2025, the Defendant, regularly in the jurisdiction of this Court, caused to be broadcast and published, the following defamatory words in a mixture of Twi and English.

PARTICULARS OF DEFAMATORY STATEMENTS BY THE DEFENDANT

"Nyɛ wawa sɛ Randy Abbey ɔkɔ inspection ewɔ cocoa farm a ɔsoa akɔnyua ɛdi firi Accra na ɔde aka na w'akɔ akɔ tena so Randy Abbey for you, dwɛɛ ne ahantan because cocoa fuo no wɔmo na etua Randy Abbey ka no wɔ mo akɔnyua no Randy Abbey antenna so, antena so ɔmo akɔnyua no ɛɛtan..."

Randy Abbey naa ɔyɛ COCOBOD Chief Executive Officer no o, ɔkɔ cocoa farmers no hɔ a, ɔsoa akɔnyua firi ne office Accra na Land Cruiser a separate Land cruiser, asoa akɔnyua no, a Land cruiser o asoa a Land Cruiser nkoa fa Randy Abbey akɔnyua na akɔ Ghana COCOBOD atɔ petrol agu land cruiser naa ekuta CEO no akɔnyua no na CEO no nso land cruiser baako na personal aid foɔ nso land cruiser baako, na n'akɔnya nso afa land cruiser baako, na cocoa akuafɔɔ no a y'afa ɔmo sika ɛdie no, yɛ di ɔmo sika atɔ

petrol agu saa land cruiser wei nyinaaa mu. Na ɔde akɔ cocoa farm hɔ. Nti ɔduru a na ye yi n'akonyua abe si hɔ na w'atena ase because cocoa kuafoɔ no a wɔmo na edi cocoa ba ma yedi tua ne ka, ne sisi noa akyia no, yedi tua ne ka, wɔmo akonyua no eso estan nti antenna so. That is Randy Abbey for you.....

Na CEO a ɔkɔ cocoa kuani no hɔ ɔketa n'akonyua dea wo firi se saa CEO no ɔbebu wo se wo cocoa kuani no ye yie? ɔbe dwene woo ho se ye yie? daabi ɔndweni wo ho....

Ena baako aba see n'aban na aba ena Randy Abbey akɔfa no aba se "wodie ye firi se wo ye NDC nii nti ye ni wo betumi abɔ korɔnoo becauze ɔmo a ɔmo wo hɔ no me nagyi ɔmo ndi, nti sika a ese se ne wia no, me ntumi nwia nti ma me mfa another Director of Finance mmra na me ns no nwia sika"

Die enti a Randy Abbey asesa Director of Finance ama n'akɔtena fie eni see ɔpe nee ɔni no be wia sika. Nyi w'akɔ akɔfa ɔnoa ni ho nipa edi no aba aba abeye no Director of Finance. Nti ɔne no na ebetumi awia COCOBOD sika no at the detriment of the poor cocoa farmer because w'aba ntii ɔɔpe sika akɔ fie. Nti Director noa na ɔwo hɔ na na ɔye Director of Finance no ɔnkɔ tena fie bosome ɔngye n'akatua me appoint another Director of Finance na ye di the same cocoa akuafoɔ no a mo see cocoa boɔ nnye nti no ɔmo ngye 128 Ghana cedis mo ntie ne, cocoa akuafoɔ mo ntie me, Randy Abbey for you. Cocoa boɔ no a enye no Director of Finance se ɔgye 18000 a month a plus allowances ni biibibiaa a enkɔ si 25000 no, wɔ ti fie. 250million bosome ni n'allowances a ne fuel allowances ne nyinaa no ɔti fie."

16. The words translated in English are as follows:

"Is it not surprising that when Randy Abbey goes for inspection on the cocoa farms, he has a chair he brings from Accra that he sits on it. That is Randy Abbey for you. Pride and arrogance, because the cocoa farmers who pay Randy Abbey, Randy would not sit on their chair because it is ugly.

Randy Abbey is the CEO of COCOBOD, when he is going to see the cocoa farmers, he carries a chair from his office in Accra inside a land cruiser, a separate land cruiser for the chair that carries Randy Abbey's chair, Ghana COCOBOD buys petrol into that land cruiser. So the CEO has one Land Cruiser, his personal aide also has one Land Cruiser and his chair also takes one Land Cruiser. And the cocoa farmers whose monies have been spent, it is their monies that are used to buy petrol for these Land Cruisers and that is what he takes to the cocoa farms. So when he gets there, they then remove the chair so that he can sit on it because the cocoa farmers who farm the cocoa so that he can be paid his crooked waist, that is what they use to pay him, their chair is very ugly so he cannot sit on it. That is Randy Abbey for you.

A CEO who when he visits the cocoa farmers has his own chairs, do you think he would respect you the cocoa farmers? or think about you for you to prosper? No he would not think about you.

The phenomenon now is that my government is in power and so Randy has brought someone "you, we believe that you are a proper NDC so we can work with you to steal because those who were here previously, I do not trust them,

so the money that I want to steal, I cannot steal it so let me take another Director of Finance so that we can steal money". The reason why Randy Abbey has changed the Director of Finance and told him to go and stay at home is that he wants someone he can steal money with so he has gone to take his own personal preference and made the person Director of Finance because he is the one he can steal COCOBOD money with to the detriment of the poor cocoa farmer because he has come to steal money and go home. So the former Director who was there as the former Director of Finance, was told to go and stay home for a month and receive pay whilst another Director of Finance is appointed and the same cocoa farmers who you told that the price of cocoa is not good so they should take 128 Ghana cedis (listen to me cocoa farmers, listen to me) Randy Abbey for me. The cocoa price that you said is not good, the Director of Finance takes 18,000 a month plus allowances and everything costs around 25,000, he is at home. 250 million a month in allowances together with fuel allowance despite all these he is sitting at home."

17. The Plaintiff says that the words in the publications which referred to him directly, particulars of which are stated in paragraphs 9 and 10 are defamatory to him as it is understood to mean that:

- a. The Plaintiff is incompetent and lacks knowledge in the cocoa business to be the Chief Executive Officer of the Ghana Cocoa Board.
- b. The Plaintiff is a thief who is plotting with other associates to defraud COCOBOD.
- c. The Plaintiff is using his capacity as the acting Chief Executive Officer of Ghana Cocoa Board (COCOBOD) to mismanage and misuse the finances of COCOBOD for his personal interest.
- d. The Plaintiff is an arrogant and proud person who does not have respect for cocoa farmers.

18. The Plaintiff denies that he has engaged in wrongful act(s) and states that he has not acted illegally and or fraudulently in any way whatsoever and or however neither has he taken steps to defraud Ghana Cocoa Board as alleged in the publication.

19. The Plaintiff says that his family, friends, associates, well-wishers and persons making direct contact with him for the very first time were stunned to hear the complained defamatory statements of outright falsehood by the Defendant.

20. The Plaintiff says that he shall contend, at trial, that the complained defamatory statements were calculated to cause maximum damage to the 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.
21. The Plaintiff says that the false and defamatory broadcast/publication inspired, motivated and attracted similar comments from followers of the Defendant including on social media with rebroadcasts/republications by various bloggers without care to verify the comments.
22. The Plaintiff states that the false and defamatory broadcasts/publications, as detailed herein, portrayed the Plaintiff as a thief, a liar, a corrupt individual, and someone involved in or engaged in criminal acts such as bribery, extortion, and unethical or unprofessional conduct in his role as the Chief Executive Officer of Ghana Cocoa Board. These statements were understood to refer to the Plaintiff.
23. The Plaintiff says that the defamatory broadcasts/ publications, understood to refer to Plaintiff, were disseminated to a substantial number of unquantifiable persons through the internet including YouTube, Facebook, TikTok and other persons who continue to further propagate the defamatory comments.
24. The 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 hold him in high regard.
25. The Plaintiff says that he has interacted and interfaced with a large number of unquantified people globally including through his Good Morning Ghana which he has hosted since 2002 to 2025 and that his conduct, both public and private, leaves his family, friends, associates and well-wishers an expectation contrary to the complained comments and publication.
26. The Plaintiff, inter alia, shall rely on the following to assert the said reputation for damages:

PARTICULARS OF PROFESSIONAL REPUTATION

- a. The Plaintiff is the owner and President of Hearts of Lions FC Limited.

- b. The Plaintiff was the Managing Director of Ignite Media Group
 - c. The Plaintiff was the Board Chairman of the Commercial and Allied Services Cluster- Jospong Group of Companies.
 - d. The Plaintiff is the Board Chairman of Peduase Valley Resort (4 Star Resort).
 - e. The Plaintiff is the Executive Council Member of Ghana Football Association.
 - f. The Plaintiff was the Director of News, Current Affairs and Sports on Metro TV.
 - g. The Plaintiff was a member of the Metro TV Board of Directors till his appointment as Chief Executive Officer of the Ghana Cocoa Board.
 - h. The Plaintiff was a non-executive director and spokesperson for the Ghana Football Association from 2006 to 2015.
 - i. The Plaintiff was a member of the Confederation of African Football Legal and Governance Committee.
 - j. The Plaintiff is a member of the Confederation of African Football legal and Governance Committee.
27. The Plaintiff says that by reason of the publications of the said words and also the graphic broadcast particulars of which are contained in paragraphs 7 and 8, the Plaintiff has been seriously injured in his reputation and has been brought into public scandal odium and contempt.
28. The Plaintiff says that since the publication and broadcast, the Plaintiff has been inundated with numerous calls asking very embarrassing questions and inquiries from different people including colleagues, business associates and colleagues worldwide together with friends and acquaintances both in Ghana and abroad
29. The Plaintiff says that the Defendant acted maliciously in publishing and broadcasting the said defamatory words which were designed to cause hatred, ridicule and public odium and has also tarnished Plaintiff's hard-earned reputation in Ghana and abroad.
30. The Plaintiff says that the Defendant knew and or ought to have known that his publication would cause maximum damage especially when the Defendant

states that the Plaintiff is a thief who has appointed a Director of Finance to assist the Plaintiff steal money from the Ghana Cocoa Board (COCOBOD)

31. The Plaintiff says that the Defendant's conduct in publishing and broadcasting the said defamatory broadcast and publication was malicious and deliberate to cause more injury to the Plaintiff in that before the publication Defendant was and should have been aware that the said publication and broadcast could not be true.

PARTICULARS OF MALICE

- a. The Defendant made the defamatory statements with a clear and deliberate intent to harm the Plaintiff's personal and professional reputation knowing that such statements would cause substantial damage to the Plaintiff's standing in society particularly as the acting Chief Executive Officer of Ghana Cocoa Board.
- b. That the Defendant published the defamatory statements with reckless disregard for the truth, failing to take any reasonable steps to verify the accuracy of the allegations made about the Plaintiff before broadcasting them to the Public.
- c. The Defendant made and disseminated the defamatory statements without any attempt to investigate or substantiate the claims.
- d. The Defendant made the defamatory statement with the ulterior motive of undermining the Plaintiff's position as the acting Chief Executive Officer of the Ghana Cocoa Board with the specific intent to damage the Plaintiff's reputation thereby hindering his ability to effectively perform his duties in office.
- e. The broadcasts/publications made by the Defendant were entirely unfounded, unsubstantiated and made without any lawful excuse or justification, reflecting a malicious intent to harm the Plaintiff's personal dignity, professional integrity and public image.

- f. That the Defendant knowingly endorsed and propagated false and malicious claims including the false accusation that the Plaintiff was involved with allegedly plotting with associates to defraud COCOBOD.
 - g. The Defendant's actions were undertaken with the intention of eroding the public trust and confidence that the Plaintiff has built in his professional career fully aware that such false statements would result in irreparable harm to the Plaintiff's personal dignity.
32. The Plaintiff will rely on the following facts and matters in support of his claim for damages including punitive damages for defamation:

PARTICULARS OF DAMAGES

- a. The complained defamatory broadcasts/ publications were made by the Defendant maliciously or recklessly not caring to verify their truth or accuracy.
 - b. The complained-of defamatory broadcasts/publications were made by the Defendant, knowing fully well or without a reasonable basis to believe they were not false.
 - c. The complained defamatory broadcasts/publications were made without any regard whatsoever for the damage to Plaintiff's reputation.
 - d. The Defendant has caused grave damage to the Plaintiff's reputation as right-thinking people have, in spite of Plaintiff's denial, continued to rely on the same broadcasts/ publications to pour scorn on and holding Plaintiff as incompetent, unethical, unprofessional, corrupt, a criminal/criminally minded and a dishonest person.
33. The Plaintiff says that the Defendant published and broadcast the said words with the knowledge that the publication was untrue neither was it a fair comment and yet opted to embark on this injurious publication to the detriment of the Plaintiff.

34. The Plaintiff puts his reputational value at approximately Twenty Million Ghana Cedis (Ghc20 million) which has been injured by the publication of Defendant.
35. The Plaintiff says that the Publication by the Defendant has exposed him to ridicule and has reduced his reputation before the right thinking of the society.
36. The Plaintiff says that unless restrained by this Honourable Court, the Defendant will continue to publish and broadcast the said words complained of and or similar words as those complained of particulars of which are contained in paragraphs 7 and 8.

WHEREFORE the Plaintiff claims against the Defendant the following reliefs on the Writ of Summons

- a. A declaration that the complained broadcasts/ publications by the Defendant 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.
- b. An order for an unconditional retraction, unqualified apology and complete removal from the internet of the said defamatory broadcasts/publications doing so on all of the Defendant's platforms including his social media platforms.
- c. An order for the publication as in relief (b) to be carried out within 14 days from the date of judgment.
- d. An order for the publications as in relief (b) to be given prominence on all said platforms for a period of one (1) month.
- e. An order that the contents of relief (b) be subject to the prior approval of the Plaintiff.
- f. An order of perpetual injunction restraining the Defendant either by himself or his agents or assigns from further publishing and or broadcasting and or

distributing films and or videos containing the following defamatory words or like words.

- g. General damages in the amount referred to in paragraph 34 of the Writ of Summons against the Defendant in favour of the Plaintiff for the defamatory publications or broadcasts posted by the Defendant online.
- h. Punitive damages against the Defendant in favour of the Plaintiff as punishment for the defamatory broadcasts/publications made online.
- i. Compensatory damages against the Defendant in favour of the Plaintiff as punishment for the defamatory broadcast/publication made online.
- j. Legal costs
- k. Any other orders that this Honourable Court deems fit to make.

DATED IN ACCRA THIS 26TH DAY OF AUGUST, 2025

**The Registrar,
High Court
Accra.**

AND FOR SERVICE ON THE ABOVE-NAMED DEFENDANT