

REGISTRAR  
HIGH COURT  
ACCRA

BP-3000088811



**WRIT OF SUMMONS**

(Order 2 rule 3(1))

WRIT ISSUED FORM ACCRA 23/2/2026 SUIT No. GJ/0450/2026

**IN THE HIGH COURT OF JUSTICE  
ACCRA- A.D. 2026**

BETWEEN

**HON. KOJO OPPONG NKRUMAH  
HOUSE NO. 72 AKIM ANYINASE  
AKYEMANSA DISTRICT  
EASTERN REGION**

\*\*\*\*\*

**PLAINTIFF**

VRS

**MR. JAMAL KONNEY  
COCOA MARKETING COMPANY OF GHANA  
3<sup>RD</sup> FLOOR, GPS: GA-105-0175  
COCOA HOUSE, KWAME NKRUMAH AVENUE,  
ACCRA, GHANA.**

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**DEFENDANT**

**TO: MR. JAMAL KONNEY**

**AN ACTION** having been commenced against you by the issue of this writ by the above-named Plaintiff; **HON. KOJO OPPONG NKRUMAH**

**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; MR. JAMAL KONNEY**

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

Dated this 23rd day of Feb, 2026.

Chief Justice of Ghana

**P. BAFFOE-BONNIE  
CHIEF JUSTICE**

*[Handwritten signature]*  
ACCRA

Filed on... 23/12/26  
at... 10:55 am/pm  
Registrar  
GENERAL JURISDICTION L.C. ACCRA

IN THE SUPERIOR COURT OF JUDICATURE  
IN THE HIGH COURT OF JUSTICE  
ACCRA-A.D. 2026

SUIT NO:

HON. KOJO OPPONG NKRUMAH  
HOUSE NO. 72 AKIM ANYINASE  
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DEFENDANT

STATEMENT OF CLAIM

1. The Plaintiff is a distinguished Ghanaian statesman, legal practitioner, and former media practitioner of national and international repute, and the duly elected Member of Parliament for the Ofoase-Ayirebi Constituency in the Eastern Region of the Republic of Ghana.
2. The Plaintiff has served the Republic of Ghana with distinction as Minister for Information and as the immediate past Minister for Works and Housing, offices of the highest public trust involving stewardship over sensitive national matters.
3. Prior to entering frontline politics, the Plaintiff built a formidable professional career as a lawyer, corporate advisor, and broadcast journalist, earning widespread admiration for integrity, intellectual discipline, and commitment to truth, accuracy, and responsible public communication.
4. By reason of his extensive background in journalism and public communications, the Plaintiff's reputation is inextricably linked to credibility, trustworthiness, and public confidence in his integrity.

5. The Plaintiff says that false allegations disseminated through the media ecosystem are uniquely and exceptionally injurious to him, as they strike directly at the foundation of the professional ethos upon which his public life has been built.
6. The Defendant is the Deputy Managing Director (Operations) of the Cocoa Marketing Company of Ghana and the Regional Secretary of the National Democratic Congress (NDC) in the Eastern Region of the Republic of Ghana.
7. By virtue of these influential positions, the Defendant is a public figure whose statements are reasonably perceived as authoritative, informed, and capable of shaping public opinion.
8. On or about the 13<sup>th</sup> day of February 2026, the Defendant appeared as a guest on a live radio programme broadcast on Okay FM, a station with extensive nationwide listenership and global online streaming reach.
9. During the said live broadcast, the Defendant authored, uttered, and caused to be published concerning the Plaintiff the following words in the Twi language, or words to the same effect:

**Twi Transcription**

**“Yewo kurom ha na Oppong Nkrumah yi ara de Chinafoɔ kɔguu Akyemansa a wɔresɛe kokoofuo de tu galamsey. Yewo kurom ha o! na ɔno ara de nkorɔfoɔ kɔguu Akyemansa mansini mu a, na wɔretu galamsey resɛe kokoofuo.”**

**English Translation**

**“We were in this town when Oppong Nkrumah brought Chinese workers to Akyemansa to destroy cocoa farms through galamsey. We were also here when he brought people to Akyemansa to engage in galamsey on cocoa farms.”**

10. The Plaintiff says that the Defendant deliberately presented the said statements as assertions of fact personally known to him and not as opinion, conjecture, or political rhetoric.
11. The Plaintiff shall say that, the Defendant thereby accused the Plaintiff of orchestrating, facilitating, or sponsoring illegal mining operations that resulted in the destruction of cocoa farms and livelihoods.

12. The Plaintiff shall say that, Illegal mining (“galamsey”) constitutes a serious criminal offence under the laws of Ghana and is widely condemned as an activity that devastates the environment, water bodies, agriculture, and rural economies.

13. Plaintiff avers that, the words uttered by the Defendant in their natural and ordinary meaning, and by innuendo, meant and were understood to mean that:

- a. The Plaintiff is complicit in criminal illegal mining activities in Ghana
- b. The Plaintiff imported or deployed foreign nationals to engage in unlawful resource exploitation
- c. The Plaintiff abused high public office to facilitate environmental destruction
- d. The Plaintiff is corrupt, dishonest, and morally unfit for public office
- e. The Plaintiff is responsible for the destruction of cocoa farms and the livelihoods of farmers in Ghana and
- f. The Plaintiff is an enemy of the national interest and unworthy of public confidence.

14. The Plaintiff categorically denies each and every allegation and states that the accusations are wholly false, baseless, reckless, and malicious.

15. The Plaintiff further avers that both parties are prominent political figures originating from the Eastern Region of Ghana, and that the alleged misconduct was said to have occurred within that same region, thereby magnifying the credibility and damaging impact of the publication.

16. The Defendant’s assertion that “**we were in this town**” conveyed to listeners that the alleged acts were personally witnessed and locally verifiable, lending the false allegations an appearance of authenticity and immediacy.

17. The Plaintiff states that, as the sitting Member of Parliament for a constituency (**OFOASE - AYIREBI Constituency**) comprising significant cocoa-growing communities, the allegations portray him as a betrayer of his own constituents and a destroyer of their economic lifeline.

18. The Plaintiff shall say that, the Defendant made the statements without any investigation, verification, or reasonable grounds for belief in their truth.

19. The Plaintiff avers that, the Defendant knew the allegations were false or was recklessly indifferent as to their falsity and the grave harm they would occasion.

**20.** The Plaintiff shall say that, the publication was actuated by malice, political hostility, or improper motive and was calculated to inflict maximum reputational damage on the Plaintiff.

**21.** The Plaintiff avers that the defamatory statements were broadcast live on Okay FM radio. It was also streamed live on social media and later distributed via whatsapp.

**22.** The Plaintiff shall say that, by reason of his prior career as a prominent media practitioner, the said publication has had an especially devastating impact, as allegations transmitted through media channels are accorded heightened credibility and permanence in the public domain.

**23.** The Plaintiff says that the false allegations directly undermine the very professional standards of truth and accountability that defined his media career, thereby compounding the reputational injury.

**24.** The Plaintiff shall say that, as a direct and proximate consequence of the Defendant's publication, the Plaintiff has suffered grave, extensive, and continuing injury to his reputation, dignity, standing, and well-being.

**25.** In particular, the Plaintiff has sustained:

- I.** Severe damage to his personal, professional, and political reputation locally, nationally, and internationally
- II.** Emotional distress, anxiety, humiliation, and mental anguish
- III.** Public ridicule, contempt, hostility, and derision
- IV.** Erosion of public trust among constituents, political stakeholders, and the electorate
- V.** Impairment of diplomatic, professional, governmental, and institutional relationships developed over many years of service
- VI.** Disruption of family life, privacy, peace of mind, and personal well-being
- VII.** Widespread reputational injury across traditional and digital media platforms where the allegations have been reproduced and archived
- VIII.** Exposure to unwarranted criminal suspicion and association with illegal mining activities and
- IX.** Lasting harm with profound political and social consequences.

**26.** The Plaintiff further avers that the said injuries are aggravated by the Defendant's high public office, the authoritative manner in which the allegations were delivered, and the Defendant's failure or refusal to retract or apologise.

27. The Plaintiff says that the harm occasioned is continuing, cumulative, and incapable of precise quantification.

28. Despite the gravity of the allegations, the Defendant has failed, refused, or neglected to issue any retraction, correction, or apology.

29. The Plaintiff says that the Defendant's conduct constitutes a grave abuse of freedom of expression and an unjustifiable assault on the Plaintiff's honour, character, and public standing.

**WHEREFORE THE PLAINTIFF CLAIMS AGAINST THE DEFENDANT JOINTLY AND SEVERALLY AS FOLLOWS:**

- I. **A declaration** that the words: "We were in this town when Opong Nkrumah brought Chinese workers to Akyemansa to destroy cocoa farms through galamsey. We were also here when he brought people to Akyemansa to engage in galamsey on cocoa farms." published and/or caused to be published by the Defendant on the 13<sup>th</sup> day of February 2026 concerning the Plaintiff are false, malicious, and defamatory of the Plaintiff.
- II. General damages for defamation in the sum of **GHS 20,000,000.00** for injury to the Plaintiff's reputation, dignity, and standing.
- III. Aggravated and exemplary damages in the sum of **GHS 10,000,000.00** to reflect the malicious nature of the publication, the Defendant's high public office, the wide dissemination of the defamatory matter.
- IV. An order directing the Defendant to publish a full, unconditional, and prominently displayed apology and retraction, with equal prominence to the original publication, on Okay FM, in at least three nationally circulated newspapers, and across all digital and social media platforms where the defamatory statements were disseminated.
- V. Perpetual injunction restraining the Defendant, whether by himself, his servants, agents, assigns, or privies, from further publishing, repeating, broadcasting, or causing

to be published any of the said defamatory allegations or any words to the like effect concerning the Plaintiff.

- VI. An order compelling the Defendant to remove and procure the removal of all defamatory material relating to the Plaintiff from radio archives, online publications, websites, blogs, and social media platforms under his control or influence.
- VII. Costs, including solicitor's professional fees, to be assessed in accordance with the Ghana Bar Association Scale of Fees.
- VIII. Any further or other reliefs that this Honourable Court may deem fit, just, and equitable in the circumstances

**DATED AT KOJO OPPONG NKUMAH & ASSOCIATES, NO. 22 SAPELE LOOP,  
KOKOMLEMLE, ACCRA, THIS 22<sup>ND</sup> DAY OF FEBRUARY 2026**



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**DANIEL MARTEY ADDO ESQ.  
LAWYER FOR THE PLAINTIFF  
LICENCE NO. eGAR/03114/26  
CHAMBER LICENCE NO. ePP099933/25  
BP: 3000076700**

**DANIEL MARTEY ADDO ESQ.  
BARRISTER & SOLICITOR  
SUPREME COURT OF GHANA  
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**THE REGISTRAR  
HIGH COURT  
ACCRA**

**AND A COPY FOR SERVICE ON THE DEFENDANT**