



# WRIT OF SUMMONS

(Order 2 rule 3(1))

WRIT ISSUED FROM Accra - 25th 2025

SUIT No. \_\_\_\_\_

## IN THE HIGH COURT OF JUSTICE

GENERAL JURISDICTION - ACCRA

Hugh Clement A. Brown  
House Number 16  
Ofori Adofordey Avenue  
East Adenta  
Accra

:::

Plaintiff

97/1849/2025

Vrs

1. Impact Media Limited  
Kwabinya Point I Junction  
Accra  
Telephone number 0594597593

:::

Defendants

2. Nana Yaw Asante a.k.a Dakyehene  
No. 24, Oak Street,  
Kwabinya, Accra  
Telephone number 0241233096

To  
AN ACTION having been commenced against you by the issue of this writ by the abovenamed Plaintiff.

Hugh Clement A. Brown

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.

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

Dated this 25th day of July 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 \_\_\_\_\_ A defendant appearing personally may, if Accra he desires 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

**STATEMENT OF CLAIM**

SEE ATTACHED

This writ was issued by Samuel M. Codjoe, Esq.

LAW TRUST COMPANY  
No. 43 Castle Road, Adjacent  
The Holy Spirit Cathedral,  
Old O'Reilly Senior High School  
Opposite The National Archives  
Adabraka, Accra

\_\_\_\_\_  
LAWYER FOR PLAINTIFF

whose address for service is

LAW TRUST COMPANY  
NO. 43 CASTLE ROAD,  
ADJACENT THE HOLY SPIRIT CATHEDRAL,  
OPPOSITE THE NATIONAL ARCHIVES,  
ADABRAKA, ACCRA.

Address Number and date of lawyer's current licence

SOL. LIC. NO. eGAR 00575/25  
FIRM'S BP. NO. 3000000859

Lawyer for the plaintiff

same as above

who resides at 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).

Plaintiff claims against Defendants jointly and severally for:

- a) Perpetual injunction restraining Defendants either by themselves or their agents or assigns from further publishing and or broadcasting and or distributing films and or videos containing the following defamatory words or like words and specifically the following:

*"Fine gentleman, what a fine face! Nanso nriipa no, adwene ɔde te, korɔnoo adwene; ekwan a yebefa so na Ghanafoɔ yen effort a yereye to make sure se galamsey no ano aberɛ ase no, ɔno enam kwan so pe se galamsey no, ɔhyɛ mu kena. Yɛwo ho yi, wama companies mmako maako f-o-u-r! Forest a, aban baeɛ a ɔse wagye yi, ede afiri nkurofoɔ yi nsa yi, papa yi nam hwɛbuada kwan so eresensane nkrataa ama nkurofoɔ se wɔɔmo nsan nko saa forest no a yeagyɛ yi ara yi, saa forest no ɛrebo yen ho ban yi, wɔɔmo nsane nko na wɔɔmo nkɔsɛe no. Papa wei, papa no a ɔda so no na mereka yi. Ko Facebook, wobɛhu papa ne mfonɛ. New 88.3 Extra.*

*Kɔ ho na kɔhwɛ adeɛ, wobɛhunu papa no mfonɛ wɔ ho. Watwerɛ nkrataa de ama nkurofoɔ se wɔɔmo nko. Ena ɔwɛɛɛ no, nkrataa no, wohyɛɛ da backdate no. Wahyɛ da abackdate no, ɔkaa se ɔwo nyansa, ɔkaa se n'adwene so. (01:00) obiara ahunu. But Nyankopɔn, hwɛwoabu nkotodwe a woerehwɛ obi to, na yɛfrɛ no sɛn, amoatia aka no rehwe wo to. Woahu se wokɔɔɔ bepo so afuo, woahu se obi ahu w'ahaa mu! ɔyɛɛ n'adwene se anka ɔbackdate adeɛ no, sɛdeɛ ɛbɛyɛ a obiara nhunu; yede bɛhyɛ erstwhile administration na yeaka se eye Nana Addo pen so, CEO na ɔda Forestry Commission ano ena yede permit no maa papa no se ɔnko forest reserve a President no ankasa agyina simpie so aka se yeagyɛ de afiri legal miners nsa no, yensan mma wɔɔmo nsane nko ho na wɔɔmo nsane nkɔyɛ adeɛ no bio wɔ ho; because ɔse ɔno ɔnsuro minister. Ne HR, ɔmfa no nye hwee.*

*Enti, agye se Alfred Mahama na waka na watie. (02:00) Nti minister twere nkrataa a, ɔno ɔbebu so, ɔmfa nye adwuma. Yɛkaaeɛ wo ha, obiara anka ho hwee. Wagoo ahead to issue a permit for people to go into a forest reserve a President no ankasa agyina simpie so aka akyerɛ yen se saa forest ahodoɔ no nyinaa, yeagyɛ ne nyinaa afiri galamseyfoɔ nsam. Enti, the forest is now free. Ennɛ, your Forestry Commissioner, wahyɛ aseɛ issue permit to people for them to go into that forest reserve. President, Your Excellency, John Dramani Mahama, this, wei, enye se ebia, eye eye eye bɔsrɛmuka o, there are documents to that effect!*

*Madi kan aka akyerɛ wo, ɔretwerɛ letter no, ɔretwerɛ letter no, on the letterhead of Forestry Commission no, ɔdateɛ no 16th of May 2024. Saa time no na ɔnye CEO. Saa time no, na wo John Dramani Mahama, wonyɛ, yɛfrɛ no sɛn? President na woama no appointment. (03:00) Enti your effort to make sure se we are banning illegal mining in our forest reserves no, papa wei se asem no a woreka, ɔse, ɔno ɔntee. ɔse, ɔnteeɛ o! Enti ɔno deɛ, baabi a yese yenko no, ɔse, mɛfiri ho na ɛreba yi. Ansa na meko through the four documents no mu, madi kan aka akyerɛ wo se nnɛ, akɔpim se Friday a mede the details of everything bebrɛ wo, including se papa no baa ɔtakee over from*

*the CEO a ɔwo ho, office ho, sika dodoo a ɔde renovate ne office nyinaa mede bema wo. I have all the documents. Me na mereka akyere wo! Na se saa papa wei, Dr.. Brown, se yeampamo no a, I will demonstrate against the President. Medemon... I will do (04:00) one-man demonstration ewo kurom ha against His Excellency John Dramani Mahama. Se papa wei yema kwan ma no da so te office, bere a woreko akyire aissue permit into a forest reserve and intentionally backdating it. ɔbackdate wieee no, ne were afiri se ɔno na ɔnsignee. ɔbackdate wieee no, ena ɔsignee. Na ɔkae se Ghanafoɔ, sebi eburu, sebi anyan, yeye agyimifoɔ. Ghanafoɔ yenkenkane, enti yenhunu. But wei, yeahunu. Abusua, wei des yeahunu. Wei, eye first one."*

The words translated in English are as follows:

*"Fine gentleman, what a fine face! But, the person, the mind he holds, the mind of stealing; the steps Ghanaians are taking in our effort to make sure that the galamsey reduces, he is using some means to make sure that the galamsey is rather sustained. As we sit here, he has issued permission to as many as f-o-u-r companies! The forest which when the government came into power has claimed to have taken back from the hands of people, this man, through dubious means, is signing papers for people to go back into the same forest which has been taken over and protecting us, they should go and destroy it. This man, I'm referring to the man who is on the screen. Go to Facebook, you will see his picture. New 88.3 Extra! Go there and observe things, and you will see that the man's picture there is there.*

*He has written letters to people for them to go. And when he finished writing the letters, he intentionally backdated them. He intentionally backdated them, he thought he was wise, he thought he has a big mind. (01:00) No one saw it. But God, look, when you kneel down to study someone, how do you call it, then how do you call it, the remaining dwarfs will also be observing your buttocks. Do you realise that because you made your farm on the hill, do you realise everyone has seen your details! He made his mind to backdate the thing, so that nobody would find out; it would be blamed on the erstwhile administration for us to say that it was during the reign of Nana Addo, the CEO who was in charge of the Forestry Commission, when the permit was given to the man to enter the forest reserve which the President himself stood on a platform and said we have taken from the hands of legal miners, we should let them go there again, and allow them to do the same thing there; because he says he is not afraid of a minister. His HR, he doesn't respect him. So, he will listen only when Alfred Mahama has spoken. (02:00) So, if a minister writes a letter, he will ignore it; he won't go by it. We said it here, no one said anything about it. He has gone ahead to issue a permit for people to go into a forest reserve which the President himself has stood on a platform and told us all those forest reserves have been taken over from the hands of galamseyers.*

*So, the forest is now free. Today, your Forestry Commissioner, has intentionally started to issue permit to people for them to go into that*

*forest reserve. President, Your Excellency, John Dramani Mahama, this, this is not maybe, it is not a figment of someone's imagination oh, there are documents to that effect! I have already told you that when he was writing the letter, when he was writing the letter, on the letterhead of the Forestry Commission, he dated it 16th of May 2024. At that time, he was not the CEO. At that time, you John Dramani Mahama, you were not how do you call it? President to have given him an appointment. (03:00) So, your effort to make sure that we are banning illegal mining in our forest reserves, this man says what you are saying, he says he hasn't heard it. He says he hasn't heard it, oh! So, as for him, where we are forbidden to go, he says I'm coming from there. Before I will go through the four documents, I have already told you that, from today, until I will bring you details of everything on Friday, including the fact that, when the man came and took over from the CEO who was there, the office, the amount of all the money he used to renovate the office, I will reveal it to you. I have all the documents. I am telling you! But if this man, Dr. Brown, if he is not removed, I will demonstrate against the President. I will demo... I will do (04:00) one-man demonstration here in this country against His Excellency John Dramani Mahama; if this man is allowed to stay be at the office, when he has gone back and issued permit into a forest reserve and intentionally backdating it. When he finished backdating it, he forgot it was he who signed it. When he finished backdating it, he signed it. He thought Ghanaians, excuse my language, we were fools. Ghanaians, we do not read, so, we will not find out. But we have seen this. Family, as for this one, we have seen. This is the first one."*

- b) Damages of GH¢15,000,000.00 (Fifteen Million Ghana Cedis) for libel contained in NEW 88.3 FM's 'Morning Show' radio programme published and or broadcast by Defendants on the 16<sup>th</sup> day of July 2025, particulars of which are contained in relief (a) supra.
- c) Exemplary Damages of GH¢5,000,000.00 (Five Million Ghana Cedis).
- d) Costs, inclusive of counsel's fees.
- e) A retraction and apology, 6 (six) consecutive times on Ghana Television (GTV), TV3, JOY TV, GH ONE TV, NEW 88.3 FM, JOY FM, ADOM FM, PEACE FM, and RADIO Ghana.
- f) A written retraction and apology on the website and all social media handles of NEW 88.3 FM including on Facebook, X, Instagram, TikTok, and YouTube, together with 4 (four) publications on the front and back pages of the Daily Graphic Newspaper for 4 (four) consecutive weeks.

In the Superior Court of Judicature  
In the High Court of Justice  
General jurisdiction Division  
Accra – A.D 2025

Suit No. \_\_\_\_\_

Hugh Clement A. Brown  
House Number 16  
Ofori Adofordey Avenue  
East Adenta  
Accra

::: Plaintiff

vs

1. Impact Media Limited  
Kwabinya Point I Junction  
Accra  
Telephone number 0594597593

:::

Defendants

2. Nana Yaw Asante a.k.a Dakyehene  
No. 24, Oak Street,  
Kwabinya, Accra  
Telephone number 0241233096

Filed on 25 July

at 10:55 am/pm

Registrar

COURT, ACCRA

(Plaintiff will direct service)

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Statement of claim

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1. Plaintiff, a Ghanaian national, and presently the acting Chief Executive of the Forestry Commission (Commission) commenced working in the Commission in 1993 where he did his national service from September 1993 to August 1994. Plaintiff was retained and employed in the Commission (then Forestry Department) and has occupied various positions rising from a District Forest Officer from September 1995 to July 2004, Operations Manager from July 2004 to November 2012, Director of Operations from November 2012 to June 2022 and the Executive Director of the Forest Service Division from June 2022 to January 2025, until his recent appointment as acting Chief Executive Officer in January 2025.
2. Plaintiff, a chartered professional forester with over 30 (thirty) years' service in the Commission has achieved a number of academic laurels. He holds a PhD in Tropical Forest Ecology from the University of Helsinki, Finland, a Master's degree in Forestry from Yale University in the United States of America, a Master of Business Administration degree, and a Bachelor of Science degree from the Kwame Nkrumah University of Science and Technology, Ghana.
3. Plaintiff has in addition, published a number of scientific articles in some reputable scientific journals such as the Forest Ecology & Management, IFRO World Series, Geoderma Regional, International Journal of applied Earth Observation and Geo information and also in the Current Forestry Reports.

4. Plaintiff belongs to a number of professional bodies including Ghana Institute of Foresters, Society of American Foresters, and Society for Ecological Restoration. Plaintiff is currently the Chairperson of the steering committee of TEAKNET, an international network of institutions, companies and individuals involved in the cultivation, research, harvesting, processing, and marketing of teak timber, and co-chairs with Indonesia the Broader Market Recognition Coalition (BMRC) for tropical timber producing countries advocating for national sustainable forest management systems.
5. 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.
6. 1<sup>st</sup> Defendant is a limited liability company and is the owner and operator of NEW 88.3 FM, an online radio broadcast station with a reach in the whole of Ghana and entire world. 2<sup>nd</sup> Defendant is a well-known radio presenter and TV presenter.
7. 2<sup>nd</sup> Defendant, until he joined NEW 88.3 FM, had worked as a presenter on ADOM TV and ONUA FM which are well known TV and frequency modulation stations respectively in Ghana. 2<sup>nd</sup> Defendant is a well-experienced media personnel and well-known in Ghana. He (2<sup>nd</sup> Defendant) is presently the host and presenter of the morning show on NEW 88.3 FM.
8. Plaintiff says that NEW 88.3 FM has as its flagship programme, its morning show which is broadcast in English and Twi language. Whilst English language is the official language of Ghana and also a language which is globally spoken and or understood, 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 parentage worldwide.
9. Plaintiff adds that by virtue of NEW 88.3 FM being on an online radio broadcast station and also on social media platforms including Facebook, YouTube, X, Instagram, and TikTok, has a permanent presence worldwide and all its programmes are broadcast to the whole wide world and can be accessed on any smart electronic device including mobile phones and tablets.
10. Plaintiff says that on or about the 16<sup>th</sup> day of July 2025, Defendants caused to be broadcast and published, the following defamatory words in a mixture of Twi and English:

*"Fine gentleman, what a fine face! Nanso nnipa no, adwene ɔde te, korɔnoo adwene; ekwan a yɛbɛfa so na Ghanafoɔ yen effort a yereye to make sure se galamsey no ano abere ase no, ɔno enam kwan so pɛ se galamsey no, ɔhyɛ mu kena. Yɛwɔ ho yi, wama companies mmako mmako maako f-o-u-r! Forest a, aban baɛɛ a ɔse wagye yi, ɛde afiri nkurofoɔ yi nsa yi, papa yi nam hwebuada kwan so eresensane nkrataa ama nkurofoɔ se wɔwɔmo nsan nkɔ saa forest no a yɛagyɛ yi ara yi, saa forest no ɛrebo yen ho ban yi, wɔwɔmo nsane nkɔ na wɔwɔmo nkɔsɛɛ no. Papa wei, papa no a ɔda so no na mereka yi. Kɔ Facebook, wobɛhu papa ne mfonɔ. New 88.3 Extra.*

Ko ho na kɔhwe adee, wobɛhunu papa no mfonɔ wo ho. Watwere nkrataa de ama nkurɔfoɔ se wɔkɔmo nkɔ. Ena ɔwiee no, nkrataa no, wohyee da *backdate* no. Wahye da *backdate* no, ɔkaa se ɔwo nyansa, ɔkaa se n'adwene so. (01:00) obiara anahunu. *But* Nyankopɔn, hwewoabu nkotodwe a woerehwe obi to, na yefre no sen, amoatia aka no rehwe wo to. Woahu se wokɔdɔ bepo so afuo, woahu se obi ahu w'ahaa mu! ɔyee n'adwene se anka ɔ*backdate* adee no, sɛdeɛ ebeye a obiara nhunu; yede behye *erstwhile administration* na yeaka se eye Nana Addo pen so, *CEO* na ɔda *Forestry Commission* ano ena yede *permit* no maa papa no se ɔnko *forest reserve* a *President* no ankasa agyina simpie so aka se yeagyɛ de afiri *legal miners* nsa no, yensan mma wɔkɔmo nsane nkɔ ho na wɔkɔmo nsane nkɔye adee no bio wo ho; *because* ɔse ɔno ɔnsuro *minister*. Ne *HR*, ɔmfa no nye hwee.

Enti, agye se *Alfred Mahama* na waka na watie. (02:00) Nti *minister* twere nkrataa a, ɔno ɔbɛbu so, ɔmfa nye adwuma. Yekaaee wo ha, obiara anka ho hwee. *Wagoo ahead to issue a permit for people to go into a forest reserve a President* no ankasa agyina simpie so aka akyere yen se saa *forest* ahodoɔ no nyinaa, yeagyɛ ne nyinaa afiri *galamsey*foɔ nsam. Enti, *the forest is now free*. Enne, *your Forestry Commissioner*, wahye aseɛ *issue permit to people for them to go into that forest reserve. President, Your Excellency, John Dramani Mahama, this*, wei, enye se ebia, eye eye eye ɔsɛremuka o, *there are documents to that effect!*

Madi kan aka akyere wo, ɔretwere *letter* no, ɔretwere *letter* no, *on the letterhead of Forestry Commission* no, ɔdatee no *16th of May 2024*. Saa *time* no na ɔnye *CEO*. Saa *time* no, na wo John Dramani Mahama, wonye, yefre no sen? *President* na woama no *appointment*. (03:00) Enti *your effort to make sure se we are banning illegal mining in our forest reserves* no, papa wei se asem no a woreka, ɔse, ɔno ɔntee. ɔse, ɔnteeɛ o! Enti ɔno deɛ, baabi a yese yenko no, ɔse, mɛfiri ho na ereba yi. Ansa na meko *through the four documents* no mu, madi kan aka akyere wo se nne, akɔpim se *Friday* a mede *the details of everything* bebre wo, *including* se papa no baa ɔtakee over from the *CEO* a ɔwo ho, *office* ho, sika dodoɔ a ɔde *renovate* ne *office* nyinaa mede bema wo. *I have all the documents*. Me na mereka akyere wo! Na se saa papa wei, *Dr. Brown*, se yeampamo no a, *I will demonstrate against the President*. Mɛdemon... *I will do* (04:00) *one-man demonstration* ewɔ kurom ha *against His Excellency John Dramani Mahama*. Se papa wei yema kwan ma no da so te *office*, bere a woreko akyere a *issue permit into a forest reserve and intentionally backdating it*. ɔ*backdate* wiee no, ne were afiri se ɔno na ɔnsigneeɛ. ɔ*backdate* wiee no, ena ɔsigneeɛ. Na ɔkae se *Ghana*foɔ, sebi eburu, sebi anyan, yeaye agyimifoɔ. *Ghana*foɔ yenkenkane, enti yenhunu. *But* wei, yeahunu. Abusua, wei deɛ yeahunu. Wei, eye *first one*."

11. The words translated in English are as follows:-

*"Fine gentleman, what a fine face! But, the person, the mind he holds, the mind of stealing; the steps Ghanaians are taking in our effort to make sure that the galamsey reduces, he is using some means to make sure that the galamsey is rather sustained. As we sit here, he has issued permission to as many as f-o-u-r companies! The forest which when the government came into power has claimed to have taken back from the*

*hands of people, this man, through dubious means, is signing papers for people to go back into the same forest which has been taken over and protecting us, they should go and destroy it. This man, I'm referring to the man who is on the screen. Go to Facebook, you will see his picture. New 88.3 Extra! Go there and observe things, and you will see that the man's picture there is there.*

*He has written letters to people for them to go. And when he finished writing the letters, he intentionally backdated them. He intentionally backdated them, he thought he was wise, he thought he has a big mind. (01:00) No one saw it. But God, look, when you kneel down to study someone, how do you call it, then how do you call it, the remaining dwarfs will also be observing your buttocks. Do you realise that because you made your farm on the hill, do you realise everyone has seen your details! He made his mind to backdate the thing, so that nobody would find out; it would be blamed on the erstwhile administration for us to say that it was during the reign of Nana Addo, the CEO who was in charge of the Forestry Commission, when the permit was given to the man to enter the forest reserve which the President himself stood on a platform and said we have taken from the hands of legal miners, we should let them go there again, and allow them to do the same thing there; because he says he is not afraid of a minister. His HR, he doesn't respect him. So, he will listen only when Alfred Mahama has spoken. (02:00) So, if a minister writes a letter, he will ignore it; he won't go by it. We said it here, no one said anything about it. He has gone ahead to issue a permit for people to go into a forest reserve which the President himself has stood on a platform and told us all those forest reserves have been taken over from the hands of galamseyers."*

12. Plaintiff says that the words in the publications, particulars of which are stated in paragraphs 10 and 11 supra, meant and were understood to mean that:
- a) Plaintiff is a dishonest person who has a mind of a thief and has embarked on ensuring that galamsey (illegal mining) in forest reserves is sustained, an act which is a crime.
  - b) Plaintiff is a criminal who has issued permits to illegal persons who were sacked from the forest reserves when the government took over the reins of powers in January 2025 to return to the forest to engage in their criminal act of illegal mining which is a crime against the state.
  - c) Plaintiff is a criminal and has intentionally backdated letters which he has written granting permits to persons to engage in illegal mining in forest reserves.
  - d) Plaintiff is a criminal who deliberately backdated letters granting permits to persons to engage in illegal mining in order to hide his fraudulent act and rather blame the previous administration of the New Patriotic Party for his illegal and criminal acts of granting permits to illegal miners to mine in forest reserves.
  - e) Plaintiff does not respect the President of the Republic of Ghana, His Excellency John Mahama and has gone contrary to the directive of the

President by granting permits to illegal persons to engage in illegal mining in forest reserves.

- f) Plaintiff does not respect Ghanaians and underestimates the intelligence of Ghanaians believing that Ghanaians are daft and do not read and will therefore not discover his fraudulent and criminal act of granting permits to illegal miners to mine in forest reserves.
13. Plaintiff denies that he engaged and or has engaged in any wrongful act(s) and states that he has not acted illegally and or fraudulently in any way whatsoever and or howsoever.
  14. Plaintiff states that he has not granted any licence and or permits to any person(s) to mine in any forest reserve. The letters referred to in the broadcast were approvals granted by him (Plaintiff) to the Executive Director, Forest Services Division, and not the actual entry permits, which are the preserve of the Executive Director of the Forest Services Division.
  15. Defendants knew and or ought to have known that by the provisions of law, including the Environmental Protection (Mining in Forest Reserves) Regulation 2022, LI 2462 (LI 2462) any person who intends to engage in mining in a forest reserve is required to obtain licenses in sequential order as contained in the first schedule of the said LI 2462, namely a mineral right permit from the Ministry of Lands and Natural Resources, an Environmental Permit from the Environmental Protection Agency, a water use permit from the Water Resources Commission, and a Mining Operating Permit from the Minerals Commission, after which the Forestry Commission issues an entry permit.
  16. Defendants further knew and or ought to have known that it is impossible for Plaintiff and or the Forestry Commission to issue any licenses and or permits to any person to engage in legal mining in a forest reserve. Defendants therefore knew and ought to know that Plaintiff cannot issue any permits and or licenses and or grant access in any way whatsoever and or howsoever to any person(s) to engage in any illegal mining in a forest reserve.
  17. The approvals referred to in the 4 (four) separate letters were effected in line with existing laws including particulars as stated in paragraphs 14 and 15 above and following due consultation with the sector minister, who was officially copied in each case and the said letters were not written covertly.
  18. Plaintiff states that the Forestry Commission in a rejoinder dated the 14<sup>th</sup> day of July 2025 and issued by its Corporate Affairs & Media Relations Unit, explained that the year '2024' in the said letters was an error and should have read '2025'.
  19. The rejoinder further explained the circumstances under which the letters were written and debunked any notion of any fraud, and wrongful act on Plaintiff's part. Defendants, though in possession of the rejoinder, have failed, neglected and or refused to publish and broadcast same, thereby causing and continuing with defamatory words against Plaintiff.
  20. Plaintiff states that in the specific case of 2<sup>nd</sup> Defendant, he (Plaintiff) together with the Manager, Corporate Affairs and Media Relations of the Forestry Commission met with him (2<sup>nd</sup> Defendant) on the 15<sup>th</sup> day of July 2025 at the

premises of the Forestry Commission and gave a detailed explanation of the fact that these letters were not backdated and also provided detailed responses to other issues raised by 2<sup>nd</sup> Defendant.

21. By reason of the publications of the said words and also the graphic broadcast, particulars of which are contained in paragraphs 10 and 11 supra, Plaintiff has been seriously injured in his reputation and has been brought into public scandal, odium, and contempt.
22. Since the publication and broadcast, Plaintiff has been inundated with numerous calls and has had to answer very embarrassing questions and inquiries from different people, including colleagues, business associates, and professional colleagues worldwide together with friends and acquaintances both in Ghana and abroad.
23. Plaintiff contends that the Defendants 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 both in Ghana and abroad. Defendants knew and or ought to have known that the publication would cause maximum damage, especially when they (Defendants) state as a fact that Plaintiff had engaged in criminal acts of forgery and or backdating of letters with the intent to commit crime and committing the crime of forgery.
24. Plaintiff will contend that Defendants' conduct in publishing and broadcasting the said defamatory broadcast and publication was malicious and deliberate to cause more injury to Plaintiff, in that before the publication, Defendants were and or should have been aware that the publication and broadcast could not be true.

*Particulars of Malice*

- a) Defendants deliberately caused the said broadcast and publication to be made at prime time and on the flagship programme which is the morning show to ensure that this broadcast and publication would be broadcast worldwide and nationwide and intended same to have maximum effect on its listenership in Ghana.
  - b) A simple inquiry and or investigation by Defendants from Plaintiff and or the Forestry Commission would have shown that there was no truth in the information which formed the basis of the wrongful publication.
  - c) Defendants knew and or ought to have known that it is inconceivable and impossible for Plaintiff to backdate letters granting permits to persons to engage in illegal mining in forests in an established institution such as the Forestry Commission.
  - d) Defendants knew and ought to have known that mining leases and or licences and or permits are not granted by the Forestry Commission but by the Minerals Commission.
25. Plaintiff will rely on the following facts and matters in support of his claim for exemplary damages:

- a) The broadcast and publication was made in a sensational manner at prime time and specifically on the Morning Show which is the flagship programme of NEW 88.3 FM, knowing very well that it is impossible for Plaintiff to backdate letters granting permission to persons to engage in illegal mining in a forest reserve.
  - b) Defendants deliberately published and broadcasted the alleged grant of permits by Plaintiff to persons to engage in illegal mining in forest reserves to maintain and increase the listenership of the said NEW 88.3 FM and its social media handles including Facebook, YouTube, X, Instagram, and TikTok in order to attract listenership and visitors to their said platforms so as to be attractive to advertisers and thereby increase revenue. Defendants acted with reckless disregard for the truth of the broadcast and publication.
  - c) 2<sup>nd</sup> Defendant who is a known media personality deliberately caused this broadcast and publication to increase his influence and standing in the media landscape.
26. Plaintiff will contend that Defendants published and or broadcasted the said words with the knowledge that they were being reckless and or with reckless disregard as to whether or not they were libellous.
  27. Plaintiff says that unless restrained by this honourable court, Defendants 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 10 and 11 supra.
  28. Wherefore, Plaintiff claims against Defendants jointly and severally for:
    - a) Perpetual injunction restraining Defendants either by themselves or their agents or assigns from further publishing and or broadcasting and or distributing films and or videos containing the following defamatory words or like words and specifically the following:

*"Fine gentleman, what a fine face! Nanso nnipa no, adwene ɔde te, korɔnoo adwene; ekwan a yɛbɛfa so na Ghanafoɔ yɛn effort a yɛreye to make sure sɛ galamsey no ano aberɛ ase no, ɔno enam kwan so pɛ sɛ galamsey no, ɔhyɛ mu kena. Yɛwɔ hɔ yi, wama companies mmako maako f-o-u-r! Forest a, aban baɛɛ a ɔsɛ wagye yi, ɛde afiri nkurofoɔ yi nsa yi, papa yi nam hwɛbuada kwan so ɛresensane nkrataa ama nkurofoɔ sɛ wɔwɔmo nsan nkɔ saa forest no a yɛagye yi ara yi, saa forest no ɛrebɔ yɛn ho ban yi, wɔwɔmo nsane nkɔ na wɔwɔmo nkɔsɛɛ no. Papa wei, papa no a ɔda so no na mereka yi. Kɔ Facebook, wobɛhu papa ne mfonɪ. New 88.3 Extra.*

*Kɔ hɔ na kɔhwɛ adeɛ, wobɛhunu papa no mfonɪ wɔ hɔ. Watwɛrɛ nkrataa de ama nkurofoɔ sɛ wɔwɔmo nkɔ. ɛna ɔwɛɛɛ no, nkrataa no, wohyɛ da backdate no. Wahyɛ da abackdate no, ɔkaa sɛ ɔwɔ nyansa, ɔkaa sɛ n'adwene so. (01:00) obiara anhunɔ. But Nyankopɔn, hwɛwoabu nkotodwe a woerhwe obi to, na yɛfrɛ no sɛn, amoatia aka no rehwe wo to. Woahu sɛ wokɔɔwɔ bɛpɔ so afuo, woahu sɛ obi ahɔ w'ahaa mu! ɔyɛɛ n'adwene sɛ anka ɔbackdate adeɛ no, sɛdɛɛ ɛbɛyɛ a obiara nhunu; yɛde bɛhyɛ erstwhile administration na yɛaka sɛ ɛyɛ*

*Nana Addo pen so, CEO na ɔda Forestry Commission ano ena yede permit no maa papa no se ɔnko forest reserve a President no ankasa agyina simpie so aka se yeagye de afiri legal miners nsa no, yensan mma wɔwɔmo nsane nko ho na wɔwɔmo nsane nkoye adee no bio wo ho; because ɔse ɔno ɔnsuro minister. Ne HR, ɔmfa no nye hwee.*

*Enti, agye se Alfred Mahama na waka na watie. (02:00) Nti minister twere nkrataa a, ɔno ɔbebu so, ɔmfa nye adwuma. Yekaaee wo ha, obiara anka ho hwee. Wagoo ahead to issue a permit for people to go into a forest reserve a President no ankasa agyina simpie so aka akyere yen se saa forest ahodoɔ no nyinaa, yeagye ne nyinaa afiri galamseyfoɔ nsam. Enti, the forest is now free. Enne, your Forestry Commissioner, wahye aseɛ issue permit to people for them to go into that forest reserve. President, Your Excellency, John Dramani Mahama, this, wei, enye se ebia, eye eye eye bɔsrɛmuka o, there are documents to that effect!*

*Madi kan aka akyere wo, ɔretwere letter no, ɔretwere letter no, on the letterhead of Forestry Commission no, ɔdatee no 16th of May 2024. Saa time no na ɔnye CEO. Saa time no, na wo John Dramani Mahama, wonye, yefre no sen? President na woama no appointment. (03:00) Enti your effort to make sure se we are banning illegal mining in our forest reserves no, papa wei se asem no a woreka, ɔse, ɔno ɔntee. ɔse, ɔntee o! Enti ɔno dee, baabi a yese yenko no, ɔse, mefiri ho na ereba yi. Ansa na meko through the four documents no mu, madi kan aka akyere wo se nne, akɔpim se Friday a mede the details of everything bebɛre wo, including se papa no baa ɔtakee over from the CEO a ɔwo ho, office ho, sika dodoɔ a ɔde renovate ne office nyinaa mede bema wo. I have all the documents. Me na mereka akyere wo! Na se saa papa wei, Dr.. Brown, se yeampamo no a, I will demonstrate against the President. Medemon... I will do (04:00) one-man demonstration ewo kurom ha against His Excellency John Dramani Mahama. Se papa wei yema kwan ma no da so te office, bere a woreko akyire aissue permit into a forest reserve and intentionally backdating it. ɔbackdate wieee no, ne were afiri se ɔno na ɔnsigneeɛ. ɔbackdate wieee no, ena ɔsigneeɛ. Na ɔkae se Ghanafoɔ, sebi eburu, sebi anyan, yeys agyimifoɔ. Ghanafoɔ yenkenkane, enti yenhunu. But wei, yeahunu. Abusua, wei dee yeahunu. Wei, eye first one."*

The words translated in English are as follows:

*"Fine gentleman, what a fine face! But, the person, the mind he holds, the mind of stealing; the steps Ghanaians are taking in our effort to make sure that the galamsey reduces, he is using some means to make sure that the galamsey is rather sustained. As we sit here, he has issued permission to as many as f-o-u-r companies! The forest which when the government came into power has claimed to have taken back from the hands of people, this man, through dubious means, is signing papers for people to go back into the same forest which has been taken over and protecting us, they should go and destroy it. This man, I'm referring to the man who is on the screen. Go to Facebook, you will see his picture. New 88.3 Extra! Go there and observe things, and you will see that the man's picture there is there.*

*He has written letters to people for them to go. And when he finished writing the letters, he intentionally backdated them. He intentionally backdated them, he thought he was wise, he thought he has a big mind. (01:00) No one saw it. But God, look, when you kneel down to study someone, how do you call it, then how do you call it, the remaining dwarfs will also be observing your buttocks. Do you realise that because you made your farm on the hill, do you realise everyone has seen your details! He made his mind to backdate the thing, so that nobody would find out; it would be blamed on the erstwhile administration for us to say that it was during the reign of Nana Addo, the CEO who was in charge of the Forestry Commission, when the permit was given to the man to enter the forest reserve which the President himself stood on a platform and said we have taken from the hands of legal miners, we should let them go there again, and allow them to do the same thing there; because he says he is not afraid of a minister. His HR, he doesn't respect him. So, he will listen only when Alfred Mahama has spoken. (02:00) So, if a minister writes a letter, he will ignore it; he won't go by it. We said it here, no one said anything about it. He has gone ahead to issue a permit for people to go into a forest reserve which the President himself has stood on a platform and told us all those forest reserves have been taken over from the hands of galamseyers.*

*So, the forest is now free. Today, your Forestry Commissioner, has intentionally started to issue permit to people for them to go into that forest reserve. President, Your Excellency, John Dramani Mahama, this, this is not maybe, it is not a figment of someone's imagination oh, there are documents to that effect! I have already told you that when he was writing the letter, when he was writing the letter, on the letterhead of the Forestry Commission, he dated it 16th of May 2024. At that time, he was not the CEO. At that time, you John Dramani Mahama, you were not how do you call it? President to have given him an appointment. (03:00) So, your effort to make sure that we are banning illegal mining in our forest reserves, this man says what you are saying, he says he hasn't heard it. He says he hasn't heard it, oh! So, as for him, where we are forbidden to go, he says I'm coming from there. Before I will go through the four documents, I have already told you that, from today, until I will bring you details of everything on Friday, including the fact that, when the man came and took over from the CEO who was there, the office, the amount of all the money he used to renovate the office, I will reveal it to you. I have all the documents. I am telling you! But if this man, Dr. Brown, if he is not removed, I will demonstrate against the President. I will demo... I will do (04:00) one-man demonstration here in this country against His Excellency John Dramani Mahama; if this man is allowed to stay be at the office, when he has gone back and issued permit into a forest reserve and intentionally backdating it. When he finished backdating it, he forgot it was he who signed it. When he finished backdating it, he signed it. He thought Ghanaians, excuse my language, we were fools. Ghanaians, we do not read, so, we will not find out. But we have seen this. Family, as for this one, we have seen. This is the first one."*

- b) Damages of GH¢15,000,000.00 (Fifteen Million Ghana Cedis) for libel contained in NEW 88.3 FM's 'Morning Show' radio programme published

and or broadcast by Defendants on the 16<sup>th</sup> day of July 2025, particulars of which are contained in relief (a) supra.

- c) Exemplary Damages of GH¢5,000,000.00 (Five Million Ghana Cedis).
- d) Costs, inclusive of counsel's fees.
- e) A retraction and apology, 6 (six) consecutive times on Ghana Television (GTV), TV3, JOY TV, GH ONE TV, NEW 88.3 FM, JOY FM, ADOM FM, PEACE FM, and RADIO Ghana.
- f) A written retraction and apology on the website and all social media handles of NEW 88.3 FM including on Facebook, X, Instagram, TikTok, and YouTube, together with 4 (four) publications on the front and back pages of the Daily Graphic Newspaper for 4 (four) consecutive weeks.

Date at Law Trust Company, No. 43, Castle road, Adabraka, Accra this 25<sup>th</sup> day of July 2025.

LAW TRUST COMPANY  
No. 43 Castle Road, Adjacent  
The Holy Spirit Cathedral,  
Old O'Reilly Senior High School  
Opposite The National Archives  
Adabraka, Accra

Lawyer for Plaintiff  
Samuel M. Codjoe, Esq.  
Law Trust Company  
Lic. No. eGAR00575/25

The Registrar  
High Court  
Accra

And for service on the above-named 1<sup>st</sup> Defendant

And for service and on the above-named 2<sup>nd</sup> Defendant