



WRIT OF SUMMONS

WRIT ISSUED FROM **ACCRA 13/05/2025**

(Order 2 rule 3(1))

SUIT No.

GT/0774/2025

IN THE HIGH COURT OF JUSTICE
ACCRA

HON. ROCKSON NELSON DAFEAMEKPOR
Parliament House
Accra

PLAINTIFF

VRS

HON. REVEREND JOHN NTIM FORDJOUR
Parliament House
Accra

DEFENDANT

To

AN ACTION having been commenced against you by the issue of this writ by the above-named Plaintiff,
HON. ROCKSON NELSON DAFEAMEKPOR

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 **HON. REVEREND JOHN NTIM FORDJOUR**

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

Dated this **13th** day of **May**, 2025.
Chief Justice of Ghana

P. BAFFOE-BOWEN
(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.

*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).

STATEMENT OF CLAIM

Particulars of Defamation pursuant to Order 57 Rule 2 of the High Court Civil Procedure Rules, 2004 (C.I. 47) are endorsed as follows:

a. That on the 8th of May, 2025, the Defendant made a post about him on "X" formerly known as "Twitter".

b. That in the said post, the following defamatory statements were made of the Plaintiff;

"Hon Rockson Nelson Dafeamekpor MP for South Dayi and Majority (NDC) chief whip in Parliament was vice chairman to the Committee on Subsidiary Legislation at the time Adu Boahen allegedly paid GHC 360,000 to the Committee for passing an L.I.

Is it not fair that a transparent probe is conducted for Hon. Dafeamekpor to appear and answer questions, to confirm or deny the serious allegation levelled against his Committee?

When the probe begins, NDC and every other person indicted will take their turns to explain how much of the GHC 49 million they looted.

The probe is necessary and cannot be evaded. They should therefore get ready with their responses."

c. That the said post of the Defendant on his X formerly Twitter account, is defamatory of the Plaintiff's hard earned reputation as a public servant with several years of service.

d. That the said statements are untrue, were made without any evidence, and were actuated by malice.

e. That the said statement caught the attention of the public and has drawn negative reactions from members of the general public.

f. The Plaintiff avers that the said post of the Defendant on "X" formerly "Twitter" has lowered the reputation of the Plaintiff in the estimation of right thinking members of the public.

g. That by reason of the said defamatory statements, the Plaintiff has suffered serious injury to his character and reputation as a Parliamentary Candidate, and has been brought into public scandal, ridicule, and contempt.

h. The Plaintiff says that the statement by the Defendant is careless and reckless and without any lawful excuse or justification.

i. That the Plaintiff has further suffered economic harm, loss of business, disruption to his professional activities, and extreme emotional distress as a result of the widespread dissemination and continuous accessibility of the defamatory statements.

The Plaintiff claims against the Defendant as follows:

a. A declaration that the statement made by the Defendant against the Plaintiff in paragraph 7 in this Statement of Claim and published on "X" formerly known as "Twitter" is false, malicious and defamatory of the Plaintiff.

- b. An order of Interlocutory Injunction, restraining the Defendant, his assigns, privies, agents and workmen and all persons claiming through the Defendant from publishing the statements made by the Defendant in relation to the Plaintiff pending the final determination of the suit.
- c. An order of perpetual injunction restraining the Defendant from making or in any other way, causing to be published any further defamatory statements about the Plaintiff.
- d. An order directed at the Defendant to retract the said defamatory statement made about the Plaintiff and posted online.
- e. An order directed at the Defendant to publish an apology to the Plaintiff in the following manner;
 - i. By making one publication in a national daily newspaper
 - ii. By posting on the "X" formerly "Twitter" social media platform with the same prominence the defamatory words received within seven (7) days of the judgment being delivered by this Honourable Court.
- f. General damages in the sum of the reputational value of the Plaintiff as stated in paragraph 5 above, against the Defendant in favour of the Plaintiff for the defamatory statement posted by the Defendant online.
- g. Aggravated damages against the Defendant for subjecting the Plaintiff to humiliating and malicious circumstances through his defamatory statement against the Plaintiff posted online.
- h. Punitive damages against the Defendant in favour of the Plaintiff as punishment for the defamatory statement posted online.
- i. Compensatory damages against the Defendant in favour of the Plaintiff for the defamatory statement posted online by the Defendant.
- j. Legal costs.
- k. Any other Orders that this Honourable Court deems fit to make.

This writ was issued by
Whose address for service is

Agent for
Address Number and date of lawyer's current licence.

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

Indorsement to be made within 3 days after service

This writ was served by me at
on the defendants

on the day of
endorsed the day of

Signed.....

Address.....

IN THE SUPERIOR COURT OF JUDICATURE
IN THE HIGH COURT OF JUSTICE
GENERAL JURISDICTION
ACCRA- AD 2025

Filed on	13/05/2025
at	2:04 am/pm
	Registrar
HIGH COURT ACCRA	

SUIT NO

HON. ROCKSON NELSON DAFEAMEKPOR
Parliament House
Accra

PLAINTIFF

VRS

HON. REVEREND JOHN NTIM FORDJOUR
Parliament House
Accra

DEFENDANT

STATEMENT OF CLAIM

1. The Plaintiff is a public servant and serves as a Member of the seventh and eighth Parliament representing the South Dayi constituency in the Volta Region of Ghana on the ticket of the National Democratic Congress (NDC).
2. The Defendant is a Ghanaian politician and a member of the seventh Parliament of the Republic of Ghana representing the Assin South Constituency in the Central Region on the ticket of the New Patriotic Party (NPP).
3. The Plaintiff is a very highly respected by many, both locally and abroad especially as the Plaintiff has by virtue of his work as an Honourable Member of Parliament worked with various individuals, bodies, institutions and organs within and outside Ghana.
4. The Plaintiff has served as a member of NDC and is currently the Chief whip in Parliament of Ghana.
5. The Plaintiff says that his reputational value as a result of his professional and public service is worth in excess of Thirty Million Ghana Cedis (GHC 30,000,000.00) at present.
6. The Plaintiff says that on the 8th of May, 2025, the Defendant made a post about him on "X" formerly known as "Twitter".

7. The Plaintiff says that in the said post, the following defamatory statements were made of the Plaintiff;

"Hon Rockson Nelson Dafeamekpor MP for South Dayi and Majority (NDC) chief whip in Parliament was vice chairman to the Committee on Subsidiary Legislation at the time Adu Boahen allegedly paid GHC 360,000 to the Committee for passing an L.I.

Is it not fair that a transparent probe is conducted for Hon. Dafeamekpor to appear and answer questions, to confirm or deny the serious allegation levelled against his Committee?

When the probe begins, NDC and every other person indicted will take their turns to explain how much of the GHC 49 million they looted.

The probe is necessary and cannot be evaded. They should therefore get ready with their responses."

8. The Plaintiff says that the said post of the Defendant on his "X" formerly "Twitter" account, is defamatory of the Plaintiff's hard-earned reputation as a public servant with several years of service.
9. The Plaintiff says that the defamatory statements made in paragraph 7 above, by its natural and ordinary meaning construed by right-thinking members of society means that:
- a. the Plaintiff is corrupt and accepts bribes to pass a Legislative Instrument.
 - b. the Plaintiff is abusing his office as a public officer as a Member of Parliament.
 - c. the Plaintiff, as a result of these alleged acts, is unfit to hold himself out as a Member of Parliament for the South Dayi Constituency in the Volta Region and is instead a dishonest, untrustworthy, and morally depraved individual whose conduct is detrimental to public interest, undermines the rule of law, and is damaging to public safety and good governance.

10. The Plaintiff states that the statements made by the Defendant in paragraph 7 above were false, malicious and defamatory, calculated to cause hatred, disparage, ridicule and injure the Plaintiff's hard-earned reputation in Ghana in the minds of the right-thinking members of society.

PARTICULARS OF DEFAMATION

- a. That on the 8th of May, 2025, the Defendant made a post about him on "X" formerly known as "Twitter".
- b. That in the said post, the following defamatory statements were made of the Plaintiff;

"Hon Rockson Nelson Dafeamekpor MP for South Dayi and Majority (NDC) chief whip in Parliament was vice chairman to the Committee on Subsidiary Legislation at the time Adu Boahen allegedly paid GHC 360,000 to the Committee for passing an L.I.

Is it not fair that a transparent probe is conducted for Hon. Dafeamekpor to appear and answer questions, to confirm or deny the serious allegation levelled against his Committee?

When the probe begins, NDC and every other person indicted will take their turns to explain how much of the GHC 49 million they looted.

The probe is necessary and cannot be evaded. They should therefore get ready with their responses."

- c. That the said post of the Defendant on his X formerly Twitter account, is defamatory of the Plaintiff's hard-earned reputation as a public servant with several years of service.
- d. That the said statements are untrue, were made without any evidence, and were actuated by malice.
- e. That the said statement caught the attention of the public and has drawn negative reactions from members of the general public.

- d. That the said post of the Defendant on "X" formerly "Twitter" has lowered the reputation of the Plaintiff in the estimation of right thinking members of the public.
 - e. That by reason of the said defamatory statements, the Plaintiff has suffered serious injury to his character and reputation as a Parliamentary Candidate, and has been brought into public scandal, ridicule, and contempt.
 - f. The Plaintiff says that the statement by the Defendant is careless and reckless and without any lawful excuse or justification.
 - g. That the Plaintiff has further suffered economic harm, loss of business, disruption to his professional activities, and extreme emotional distress as a result of the widespread dissemination and continuous accessibility of the defamatory statements.
11. The Plaintiff says that the defamatory statements made by the Defendant and published on "X" formerly "Twitter" are untrue and same was made with calculated malice, aforethought in order to paint the plaintiff as a person who is corrupt and accepts bribes to pass Legislations of Parliament.
12. The Plaintiff says that at the time that the then Attorney General wrote to the Subsidiary Legislation Committee regarding the consideration of the Security and Intelligence Agencies (National Intelligence Bureau Staff) Regulations, 2023, in December, 2023 he was not even a member of the said Committee let alone a Vice Chairperson of the Subsidiary Legislation Committee.
13. The Plaintiff says that since he was neither a member nor the Vice Chairperson of the Subsidiary Legislation Committee at the material time in December 2023, it is wholly false, baseless, and untenable to suggest or infer that he accepted bribes in connection with the consideration or passing of the Security and Intelligence Agencies (National Intelligence Bureau Staff) Regulations, 2023.
14. The Plaintiff says that such an allegation by the Defendant is not only factually inaccurate but was made recklessly and maliciously, with the clear intent to mislead the public and cause maximum reputational harm and were made without any proper inquiry or verification, amounting to a willful disregard for the truth.

15. The Plaintiff says that the defamatory statements proffered by the Defendant have caused constituents and the general public to question his integrity and fitness for public office, thereby undermining his ability to effectively discharge his duties as a legislator and representative of the people.
16. The Plaintiff says that the cumulative effect of these defamatory statements is to unjustifiably portray him as unfit for public office and morally compromised, thereby causing irreparable damage to his political credibility, public confidence, and personal dignity.
17. The Plaintiff says that the defamatory statements made by the Defendant were made carelessly and recklessly and without any lawful excuse or justification.
18. The Plaintiff says that the defamatory statements made by the Defendant are entirely malicious.

PARTICULARS OF MALICE

- a. That on the 8th of May, 2025, the Defendant made a post about him on "X" formerly known as "Twitter".
- b. That in the said post, the following defamatory statements were made of the Plaintiff;

"Hon Rockson Nelson Dafeamekpor MP for South Dayi and Majority (NDC) chief whip in Parliament was vice chairman to the Committee on Subsidiary Legislation at the time Adu Boahen allegedly paid GHC 360,000 to the Committee for passing an L.I.

Is it not fair that a transparent probe is conducted for Hon. Dafeamekpor to appear and answer questions, to confirm or deny the serious allegation levelled against his Committee?

When the probe begins, NDC and every other person indicted will take their turns to explain how much of the GHC 49 million they looted.

The probe is necessary and cannot be evaded. They should therefore get ready with their responses."

- c. That the Defendant made the defamatory statements with a clear and deliberate intent to harm the Plaintiff's personal, professional, and political reputation, knowing that such statements would cause substantial damage to the Plaintiff's standing in society, particularly in his capacity as a Member of Parliament.
 - d. 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.
 - e. That the said statement by the Defendant is without justification and borne out of ill-will and total disregard for the Plaintiff's reputation in society.
 - f. That the Defendant's actions were undertaken with the intention of eroding the public trust and confidence that the Plaintiff has built in his professional and political career, fully aware that such false statements would result in irreparable harm to the Plaintiff's political credibility and personal dignity.
19. The Plaintiff says that the said defamatory post was made with the sole intent of reducing him in the estimation of all right thinking persons reading it in Ghana and all over the world.
20. The Plaintiff says that the defamatory statement made by the Defendant has obtained the nature of permanence as it has provided and permanently stored on "X" formerly "Twitter" with the link address:
<https://x.com/NtimFordjour/status/1920502403742216255?t=TR6xHU5T6xb2TkJT5NzyWQ&s=08>
21. The Plaintiff says that after the publication was made, he received several phone calls and messages from his family, friends, colleagues and business associates, who had read the post.
22. The Plaintiff says that the Defendant's defamatory statement is a calculated attempt on the part of the Defendant to injure the hard-earned reputation of the Plaintiff.

23. The Plaintiff says that the widespread nature of the publication has caused damage to the Plaintiff's reputation and ability to function effectively in his professional and public role as a Member of Parliament of the South Dayi Constituency.

24. The Plaintiff says that the defamatory statements published by the Defendant has subjected him and continues to subject him to grievous damage, distress and embarrassment.

25. **WHEREFORE** the Plaintiff claims against the Defendant as follows;

- a. A declaration that the statement made by the Defendant against the Plaintiff in paragraph 7 in this Statement of Claim and published on "X" formerly known as "Twitter" portal is false, malicious and defamatory of the Plaintiff.
- b. An order of interlocutory injunction, restraining the Defendant, his assigns, privies, agents and workmen and all persons claiming through the Defendant from publishing the statements made by the Defendant in relation to the Plaintiff pending the final determination of the suit.
- c. An order of perpetual injunction restraining the Defendant from making or in any other way, causing to be published any further defamatory statements about the Plaintiff.
- d. An order directed at the Defendant to retract the said defamatory statement made about the Plaintiff and posted online.
- e. An order directed at the Defendant to publish an apology to the Plaintiff in the following manner;
 - i. By making one publication in a national daily newspaper
 - ii. By posting on the "X" formerly "Twitter" social media platform with the same prominence the defamatory words received within seven (7) days of the judgment being delivered by this Honourable Court.

- f. General damages in the sum of the reputational value of the Plaintiff as stated in paragraph 5 above, against the Defendant in favour of the Plaintiff for the defamatory statement posted by the Defendant online.
- g. Aggravated damages against the Defendant for subjecting the Plaintiff to humiliating and malicious circumstances through his defamatory statement against the Plaintiff posted online.
- h. Punitive damages against the Defendant in favour of the Plaintiff as punishment for the defamatory statement posted online.
- i. Compensatory damages against the Defendant in favour of the Plaintiff for the defamatory statement posted online by the Defendant.
- j. Legal costs.
- k. Any other Orders that this Honourable Court deems fit to make.

DATED AT ACCRA THIS 12TH DAY OF MAY 2025.

**The Registrar
High Court
General Jurisdiction
Accra**

AND FOR SERVICE ON THE ABOVE-NAMED DEFENDANT