

IN THE SUPERIOR COURT OF JUDICIATURE  
IN THE HIGH COURT OF JUSTICE  
GENERAL JURISDICTION  
ACCRA  
SUIT NO:

**FAUSTINA DJAGBELE ABBEY  
HOUSING DOWN  
ADENTA**

**PLAINTIFF**

**VERSUS**

**GHANA TELECOMMUNICATIONS COMPANY LIMITED  
(TELECEL GHANA)  
MANET TOWER A  
SOUTH LIBERATION LINK  
AIRPORT CITY  
ACCRA**

**DEFENDANT**

**(PLAINTIFF SHALL DIRECT SERVICE)**

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**STATEMENT OF CLAIM**

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1. The Plaintiff is a market woman and mostly sells onions, and resides at Housing Down, Adenta.
2. The Defendant is a well-known entity operating within the tele-communications sector with huge customer base and media visibility.
3. The Plaintiff says she has been selling onions for over forty years, and now sells at the market popularly known as "KwasiaDwaso", near Makola in Accra.
4. The Plaintiff adds she is very much known within and outside the environs of the Makola Market.
5. The Plaintiff says that she has uncountable number of customers some of whom she has known close to forty years.
6. The Plaintiff adds that she is a mother of three adult children.

7. The Plaintiff says that some time in February 2025 some of her customers started complimenting her for her appearances on traditional media, billboards and social media.
8. The Plaintiff adds that around that same time some neighbours of hers started greeting her with amusement. The Plaintiff further adds that members of her church also acted in the same manner.
9. The Plaintiff says that her colleague market women and other persons around began demanding various sums of money from her indicating she is now a rich woman.
10. The Plaintiff says that the development made her very uncomfortable and curious at the same time, and so she began demanding explanations.
11. The Plaintiff says that her enquiries concerning the situation revealed to her that her photograph or image had been used in an advertisement created and sponsored by the Defendant.
12. The Plaintiff says her photograph has been used as the face for projecting, advertising and marketing a product of the Defendant known as the "Telecel Red Save". The Telecel Red Save is a digital savings account within the Telecel Cash Platform which allows users to save money and earn interest.
13. The Plaintiff says that further checks conducted by her children and some friends of hers showed that the advertisement with her photograph had been displayed on billboards, shown on numerous television stations and posted on several social media platforms by the Defendant.
14. The Plaintiff says her photograph or image has been used and exploited by the Defendant without her CONSENT or RECOURSE to her in any form.
15. The Plaintiff says that her photograph has been used to project, advertise and market the Telecel Red Save without her consent since its inception in February 2025 till date.
16. The Plaintiff says the wanton disregard for her privacy and personal space by the Defendant has caused her much inconvenience and she has had to explain herself on countless occasions to her customers and people she interacts with who have seen the advertisements.

17. The Plaintiff adds that her children and other immediate family members of her have gone through the same inconvenient ordeals where they have to respond to several commentaries around the use of her photograph by the Defendant.

18. The Plaintiff says some of her colleagues even do not believe her when she explains to them that she had no idea about the use of her photograph by the Defendant, and this has strained their relationship, causing her pain.

19. The Plaintiff says she deems the use of her photograph by the Defendant without her consent as an affront to her personal liberties.

20. The Plaintiff says the use of her photograph without her consent by the Defendant has unnecessarily exposed her which has impacted heavily on her mental health as she is unable to deal with the enormous publicity she is faced with currently.

21. The Plaintiff says that the conduct of the Defendant is deliberate and calculated as the Defendant finds her to be vulnerable and easily exploitable.

22. The Plaintiff says the Defendant will persist in its conduct unless the Honourable Court intervenes.


23. **WHEREFORE** the Plaintiff claims against the Defendant as follows:

1. **A Declaration that the Defendant has violated and invaded the privacy and personal liberties of the Plaintiff by using the photograph of the Plaintiff to project, market and advertise the Telecel Red Save Product on numerous platforms including social media without the Consent of the Plaintiff.**
2. **A Declaration that the Defendant has violated and abused the image rights of the Plaintiff by using the photograph of the Plaintiff to project, market and advertise the Telecel Red Save Product on numerous platforms including social media without the Consent of the Plaintiff.**
3. **An Order directed at the Defendant to pay an amount of GHC 2,000,000.00 as Compensation to the Plaintiff.**



4. An Order directed at the Defendant to pull down all billboards, social media and traditional media advertisements of the Telecel Red Save which have the photograph of the Plaintiff.
5. Cost, inclusive of Solicitor's fees.
6. Any other relief as the Honourable Court deems fit

DATED THIS 20<sup>TH</sup> DAY OF MAY, 2025 AT THOMPSON LAW CONSULT, ACCRA

  
BERNARD OWIREDU DONKOR  
GAR 03191/25  
LAWYER FOR PLAINTIFF  
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THE REGISTRAR  
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AND TO THE ABOVE-NAMED DEFENDANT