



REGISTRAR
HIGH COURT
ACCRA

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

WRIT ISSUED FROM... ACCRA 21/01/2025

SUIT No:

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

GD/0382/2025

BETWEEN

ABDUL KARIM
(A.K.A NANA ROMEO)
17 MANHIA ST, ABELEMKPE
ACCRA

PLAINTIFF

VRS

1. SALLY FRIMPONG MANN
@ SALLY MANN
2. XYZ BROADCASTING
(POWER FM)
3. AGYEMANG PREMPEH
4. CLEMENT ASAMOAH
ALL OF ACCRA

DEFENDANTS

PLAINTIFF TO DIRECT SERVICE

To 1. SALLY FRIMPONG MANN 2. XYZ BROADCASTING 3. AGYEMANG PREMPEH 4. CLEMENT ASAMOAH

AN ACTION having been commenced against you by the issue of this writ by the above –named Plaintiff.

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 21st day of JAN, 2025

Chief Justice of Ghana

G. SACKY TORKORNOO (MRS)

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 desires 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).

HIGH COURT ACCRA

STATEMENT OF CLAIM

The Plaintiff claims against the Defendants jointly and severally as follows:

- a. A declaration that the words spoken by 1st Defendant, which are reproduced in paragraph 8 of the accompanying Statement of Claim and republished by the 4th Defendant are defamatory of Plaintiff's character.
- b. An order directing the Defendants to retract the defamatory statements and issue an unqualified apology to Plaintiff, to be published in the Daily Graphic and on all social media platforms where the defamatory statements were published.
- c. General damages for defamation in the sum of GHS 1,000,000.00.
- d. Aggravated damages for the malicious and reckless publication of the defamatory statements.
- e. An injunction restraining the Defendants, whether by themselves, their agents, or assigns, from further publishing or causing to be published any defamatory words against Plaintiff.
- f. Costs, including legal fees.
- g. Any further relief(s) the Court deems fit.



SAMUEL KISSIEDU, ESQ.
LAWYER FOR PLAINTIFF.

ECAM LAW CONSULT PROF.
3RD FLOOR COCOSHE/LETSHEGO HOUSE
B.28A AGOSTINO NETO CLOSE
OPPOSITE CITY ESCAPE HOTEL
AIRPORT RESIDENTIAL AREA
GPS ADDRESS: GA-057-0980
ACCRA - GHANA

This writ was issued by SAMUEL KISSIEDU, ESQ.
Whose address for service is ECAM LAW CONSULT,
3RD FLOOR COCOSHE, OPP SILVER STAR TOWER,
AIRPORT RESIDENTIAL AREA, ACCRA.

Agent for
Address Number and date of lawyer's current license. eGAR02124/25
Lawyer for the Plaintiff who resides at ACCRA

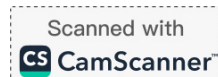
Indorsement to be made within 3 days after service

This writ was served by me at
on the 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).



IN THE SUPERIOR COURT OF JUDICATURE
IN THE HIGH COURT OF JUSTICE
GENERAL JURISDICTION
ACCRA – A.D 2025

Filed on 21/01/25
10:35 am/pm
SUIT NO.: ACCRA
PLAINTIFF

ABDUL KARIM
(A.K.A NANA ROMEO)
17 MANHIA ST, ABELEMKPE
ACCRA

VRS

1. **SALLY FRIMPPONG MANN**
@ SALLY MANN
2. **XYZ BROADCASTING**
(POWER FM)
3. **AGYEMANG PREMPEH**
4. **CLEMENT ASAMOAH**
ALL OF ACCRA

DEFENDANT

PLAINTIFF TO DIRECT SERVICE

STATEMENT OF CLAIM

1. Plaintiff is a renowned radio presenter in Accra and resides in Abelemkpe, Accra.
2. The 1st Defendant, Sally Frimpong Mann, is an entertainment pundit/analyst and show host affiliated with Adom TV. The 2nd Defendant, XYZ Broadcasting (operating as Power FM), is a company duly registered under the laws of Ghana. The 3rd Defendant, Agyemang Prempeh, is a radio host on Power FM, and the 4th Defendant, Clement Asamoah, is a social media blogger.
3. The Plaintiff avers that he has built a reputable career over the years without blemish and has never been charged or convicted of any criminal offense.
4. Plaintiff says he has won several accolades and recognition both local and international including winning the Best Male Radio host at Time Ghana Arts and Entertainment Awards, 2021 and being appointed a board member of Ohio African Community Excellence Awards, USA.
5. Plaintiff says that he first encountered the 1st Defendant in 2021, after which they became acquaintances. They subsequently met at various programs due to their shared presence in the entertainment industry.

6. Plaintiff says that in 2023, 1st Defendant embarked on a public criticism campaign targeting another industry professional, Nana Ama McBrown, on personal and professional grounds. The Plaintiff, as a friend of Nana Ama McBrown, publicly advised the 1st Defendant to desist from these attacks, which led to a breakdown in their relationship.
7. On Saturday, 14th December 2024, during a live show titled “Power Entertainment” broadcast from the 2nd Defendant’s studio and hosted by the 3rd Defendant, the 1st Defendant made defamatory statements about the Plaintiff. These statements included allegations that the Plaintiff had been convicted of raping two women, that Plaintiff is “weak” and “weak-minded,” and that the 1st Defendant had previously defended the Plaintiff but ceased contact upon discovering the Plaintiff’s purported guilt.
8. Plaintiff states that the defamatory remarks were further reinforced by the 1st Defendant’s use of biblical references, such as Psalm 26:4, to label the Plaintiff as deceitful and hypocritical.

PARTICULARS OF DEFAMATORY WORDS

“...the person I’m talking about today 3y3 Nana Romeo...”

“...Nana Romeo, you are weak, wo y3 weak-minded”

“...de3 nti a me Sally, ma decide s3 you are not fit s3 me medi wo b3kasa nkasa 3ne s3, mamenma wo scenario, Agyengo, s3 wo tenaho ei, obi di rape case etowso, rape, case etowoso, na me Sally a metenaho ei, me nim wo kakra, na me defendi, onimpa koro no si ob3 gu wanim asi, na me defendi wo, in that process thinking s3, wo Agyemang a wotenaho ei, woy3 industry person nti I do not feel se mmaa mmienu can gang up on you, to bring your disgrace; na se me middle mawo, na se asem no tumitwa na se later me findi out se you are guilty of that crime a, I will never talk to you again.

Mama scenario, ne3)w) aso nu, ontie”.

To wit;

“...The person I’m talking about is Nana Romeo...”

“...Nana Romeo, you are weak, you are weak-minded...”

“...The reason I, Sally, have decided that you are not fit for me to have any discussions with you is this: let me give you a scenario, Agyengo. Imagine someone gets involved in a rape case, a repeated rape case, and I, Sally, who knows the person a little, decide to defend the person. Thinking that, as an industry colleague, I don't believe two women can gang up on you to bring disgrace to you, I stand in

the middle to support you. But if later I find out that you are guilty of that crime, I will never talk to you again.

I've given a scenario, and if you don't listen, that's on you."

9. The Plaintiff contends that the words spoken by 1st Defendant, in their plain and ordinary meaning, imply that the Plaintiff is a convicted criminal guilty of a first-degree felony, thereby tarnishing his reputation.
10. Plaintiff says that the above words spoken by the 1st Defendant on 2nd Defendant's platform are completely false and only calculated to tarnish his well-established reputation as a distinguished and highly regarded figure in the media industry.
11. The Plaintiff avers that these defamatory statements have caused significant damage to his reputation in the eyes of right-thinking members of society, particularly as a respected media personality with a substantial following on social media and traditional airwaves.
12. Plaintiff says that the words spoken by 1st Defendant are defamatory in both their plain and ordinary meaning as well as their contextual meaning.
13. Plaintiff says that the words spoken by 1st Defendant by way of her purported analogy in their plain meaning means Plaintiff is a criminal who has been convicted of rape, a first-degree felony.
14. Plaintiff says that the words complained about by the 1st Defendant constitute an imputation of a felonious crime against Plaintiff.
15. Plaintiff says that as a media mogul, he has a large following who listen to his show both on the airwaves and on social media. The words spoken by 1st Defendant have thus caused significant negative reactions and disaffection toward him.
16. Plaintiff avers that these statements have been widely circulated on various platforms, including Facebook, TikTok, Instagram, and YouTube, through republications by the 4th Defendant, who operates social media channels such as "Gossip 24 Avenue" and "Gossip24 TV.
17. Plaintiff says the words spoken by 1st Defendant has marred Plaintiff's relationship with his longtime partner and their relationship is on the verge of collapsing.

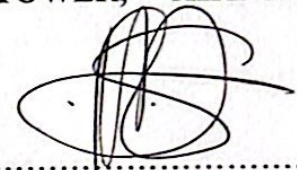
Additionally, the Plaintiff and his daughter have been subjected to embarrassment and public ridicule.

19. Plaintiff says that 2nd Defendant and 3rd Defendants gave 1st Defendant the platform to make the defamatory statements against him. 3rd Defendant particularly failed to prompt 1st Defendant about the derogatory and defamatory words but rather urged 1st Defendant on.
20. Plaintiff says that the 2nd and 3rd Defendants have, to date, failed or neglected to issue an apology to him, and the 1st Defendant has similarly refused to retract the defamatory words spoken about the Plaintiff, despite being demanded to do so.
21. Plaintiff says that 4th Defendant who is a social media blogger also republished the defamatory words spoken by 1st Defendant on his Youtube channel "*Gossip 24 Avenue*" and Tiktok blog account "*Gossip24 TV*" and purported to explain it further, thereby causing a wide circulation of the defamatory words.
22. Plaintiff says that although demanded to retract and delete the video on his platform, 4th Defendant has remained adamant and completely disregarded the Demand Notice issued by Plaintiff's solicitors.
23. Plaintiff says that Defendants will not retract and apologize to Plaintiff for defaming him on national radio without justification, neither will the Defendants compensate Plaintiff for the damage caused to his name and reputation unless compelled by this Honorable Court to do so.
24. WHEREFORE the Plaintiff claims against the Defendants jointly and severally as follows:
 - a. **A declaration that the words spoken by the 1st Defendant which are reproduced in paragraph 8 of the accompanying Statement of Claim and republished by the 4th Defendant are defamatory of Plaintiff's character.**
 - b. **An order directing the Defendants to retract the defamatory statements and issue an unqualified apology to Plaintiff, to be published in the Daily Graphic and on all social media platforms where the defamatory statements were published.**
 - c. **General damages for defamation in the sum of GHS 1,000,000.00.**

Aggravated damages for the malicious and reckless publication of the defamatory statements.

- e. An injunction restraining the Defendants, whether by themselves, their agents, or assigns, from further publishing or causing to be published any defamatory words against Plaintiff.**
- f. Costs, including legal fees.**
- g. Any further relief(s) the Court deems fit.**

DATED THIS 20TH DAY OF JANUARY, 2025 AT ECAM LAW CONSULT, 3RD FLOOR COCOSHE/AFB BANK, OPPOSITE SILVER STAR TOWER, AIRPORT RESIDENTIAL AREA, ACCRA.



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SAMUEL KISSIEDU, ESQ.
LAWYER FOR PLAINTIFF
LICENSE NO: eGAR02124/25
CHAMBER REGISTRATION: ePP00036/25

**THE REGISTRAR
GENERAL JURISDICTION
LAW COURT COMPLEX
ACCRA.**

ECAM LAW CONSULT PRUC.
3RD FLOOR COCOSHE/LETSHEGO HOUSE
B.28A AGOSTINO NETO CLOSE
OPPOSITE CITY ESCAPE HOTEL
AIRPORT RESIDENTIAL AREA
GPS ADDRESS: GA-057-0980
ACCRA - GHANA

AND COPY FOR SERVICE ON THE DEFENDANTS AT THEIR ADDRESSSES STATED ABOVE.