

REGISTRAR
HIGH COURT
ACCRA



REPUBLIC OF GHANA
WRIT OF SUMMONS
(Order 2, rule 3 (1))

WRIT ISSUED FROM... ACCRA 28/03/2025 SUIT NO GT/0640/2025

IN THE SUPERIOR COURT OF JUDICATURE
IN THE HIGH COURT OF GHANA
ACCRA, A. D 2025

TINA MENSAH
ASHIAMAN- ACCRA

=== PLAINTIFF

VRS

1. ABIGAIL KWARTENG
KUMASI

=== 1st DEFENDANT

2. NANA AMA DOKUA ASIAMAH-ADJEI
12TH DOVE STREET
ACHIMOTA, ACCRA

=== 2nd DEFENDANT

(PLAINTIFF SHALL DIRECT SERVICE)

To ABIGAIL KWARTENG, NANA AMA DOKUA ASIAMAH-ADJEI

AN ACTION having been commenced against you by the issue of this writ by the above-named plaintiff(s) TINA MENSAH

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 28th day of March 2025

Chief Justice of Ghana

G. SAGKEY TORBORRDO (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 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 the residence or business address of defendant [not P. O. Box number].

FORM 1

SEAL

CHIEF JUSTICE OF GHANA

STATEMENT OF CLAIM

Wherefore, the Plaintiff claims against the defendants jointly and severally:

- a) A declaration that the video of the Plaintiff published by the 1st and 2nd Defendants on various social media platforms including TikTok and Facebook and pleaded in paragraph 16, 17, 18 and 19 of the statement of claim are defamatory of the Plaintiff.
- b) An order directed at the Defendants. Compelling them to cause to be published conspicuously and with prominence through the Defendants social media platform an unqualified apology to the Plaintiff.
- c) Aggravated Damages of Twenty Million Ghana Cedis (GH¢ 20,000,000.00) against the Defendants
- d) An award of general damages against the Defendants for defamation.
- e) Costs (Including legal Fees)
- f) Any further orders this Honorable court may deem fit

This writ is issued by: BRIGHT APRAKU ESQ

**Whose address for service is: H/NO. D 47/2, SUNYANI
BEHIND THE SCOREBOARD, CORONATION PARK, AREA 3, SUNYANI**

Agent for THE PLAINTIFF

Lawyer for the plaintiff: **BRIGHT APRAKU, ESQ**
SOLICITOR'S LIC. NO. eBAR02528/25

**Who resides at
“HENEWAA CHAMBERS” SUNYANI**

Endorsement 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 plaintiffs claim is for 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 rule3 (2).

**BRIGHT APRAKU
BARRISTER & SOLICITOR
HENEWAA CHAMBERS
SUNYANI
024 915 9315**

Filed at 28/03/25
at 12:30
Registrar
HIGH COURT
ACCRA

IN THE SUPERIOR COURT OF JUDICATURE
IN THE HIGH COURT OF GHANA
ACCRA, A. D 2025

SUIT NO:

BETWEEN

**TINA MENSAH
ASHIAMAN- ACCRA**

== PLAINTIFF

AND

**1. ABIGAIL KWARTENG
KUMASI**

==1st DEFENDANT

**2. NANA AMA DOKUA ASIAMAH-ADJEI
12TH DOVE STREET
ACHIMOTA, ACCRA**

==2nd DEFENDANT

STATEMENT OF CLAIM

1. The Plaintiff is domiciled in Ghana but ordinarily resident in Germany and a mother of three (3) children.
2. The Plaintiff is a model, an advertiser and a brand ambassador for many reputable companies, brands and products.
3. The plaintiff as a model, contracts with reputable companies including but not limited to Skin cold product, Sasa hair, Ghanaba organist for the purposes of advertising their products through traditional and various social media platforms including Facebook, TikTok and Instagram.
4. The Plaintiff is very active on social media and has a huge following on platforms like TikTok, Facebook and Instagram, of which she has about 102,000 followers on Facebook.
5. The 1st Defendant is a resident of Kumasi in the Ashanti Region of the Republic of Ghana and a foster-daughter of the 2nd Defendant.
6. The 1st Defendant is very active on social media and has a huge following on social media Platforms including TikTok and Facebook , where she hosts most online live streams.

7. The 2nd Defendant is a citizen of Ghana and a former Member of Parliament for the Akuapem North Constituency having served for two successive terms and a defeated Parliamentary Candidate for the Okaikwei North Constituency in the 2024 parliamentary elections.
8. The 2nd Defendant is the immediate past Deputy Minister for Information and Trade and Industry during the period from 2017 and 2024.
9. The 1st Defendant is regarded as a foster daughter of the 2nd Defendant.
10. The Plaintiff avers that in and around 13th February, 2025, she visited the 1st Defendant at his residence in Kumasi, where she spent 5 days.
11. The Plaintiff further avers that, during her stay in Kumasi there were several instances where she heard and saw the 1st and 2nd Defendant having a video communication via Whatsapp.
12. The Plaintiff repeats the immediate preceding paragraph and further avers that, during these calls there were instances where both Defendants were naked.
13. The Plaintiff avers that on the 18th day of February, 2025 around the hours of 9:39Am, she was in the bathroom when the 1st Defendant who was in the bedroom intimated to her that she has been informed of the Plaintiff taking some amount of monies from some individuals to facilitate their Germany visa application.
14. The Plaintiff avers that upon hearing the allegation as spewed by the 1st Defendant she quickly rushed out of the bathroom considering the gravity of such untrue allegation made against her.
15. The Plaintiff repeats paragraph 14 above and avers that at the time she came out of the bathroom she was completely naked.
16. The Plaintiff avers that it is at that point that the 1st Defendant secretly took a video recording of her nakedness and forwarded same to the 2nd Defendant.
17. The Plaintiff further avers that the 2nd Defendant upon receipt of the Plaintiff's naked video as recorded by the 1st Defendant published same to her contacts and instructed them to publish the videos on other social media platforms

including TikTok where the Plaintiff has huge following and conduct her business.

18. The Plaintiff avers that she received the said videos on her phone by an unknown number, thereafter she confronted the 1st Defendant and she admitted to having taken the video and forwarded same to the 2nd Defendant ONLY.
19. The Plaintiff asserts that the Defendants recorded and published the said video of the plaintiff's nakedness without her consent with the purpose to defame her and to lower her in the estimation of right-thinking members of the society.

PARTICULARS OF DEFAMATION

- A. The naked video of the Plaintiff was maliciously recorded and published by the Defendants without her consent.
 - B. The Defendants deliberately published the said video to occasion hatred and contempt to the plaintiff and her profession.
 - C. The Defendants deliberately and with malicious intent published the said video containing the Plaintiff's nakedness to cause her to be shunned and exposed her to public ridicule.
 - D. The Publishing of the Plaintiff's naked video has impaired possession of the Plaintiff's reputation and good name.
 - E. The Defendants caused other individuals to publish the said video on several other social media platforms and same has become a subject of discussion even in the traditional media.
20. The Plaintiff further avers that the matter was reported to the "Suntreso" Police for investigation to be conducted. At the police station the 1st Defendant admitted taking the video and forwarded same to the 2nd Defendant.
 21. The Plaintiff further avers that, when the 1st Defendant was arraigned before the Circuit court, Kwadaso-Kumasi, she was remanded to appear before the court on a later date.
 22. The Plaintiff avers that the police have invited the 2nd Defendant for interrogations but she has willfully refused to honor the police invitation.
 23. The Plaintiff avers that the Defendants acted maliciously in publishing the said video which were designed to cause and did in fact caused her profound distress, anxiety, derision and public odium in Ghana and abroad.

24. The Plaintiff avers that she has been injured in her reputation and has lost her goodwill among the Ghanaian society and the world by reason of publishing her nakedness since same has been shared across the world.

25. The Plaintiff will rely on the following facts and matters in support of her claim for aggravated damages:

- a. The Plaintiff's contracts with various companies and individuals have been abrogated due to the action of the Defendants.
- b. The Plaintiff relationship with her fiancé who resides outside Ghana has collapsed.
- c. The Defendant's action has impeded the Plaintiff's future possible contracts since no reputable brand will want to be associated with such public ridicule.
- d. The Plaintiff's children are being mocked and ridiculed among their colleagues both in school and in public places causing severe derision, anxiety and mental distress.

26. In consequence, the Plaintiff's reputation as a model and an advertiser has been egregiously damaged and she has suffered debilitating distress and embarrassment.

27. WHEREFORE, the Plaintiff claims against the Defendants as follows:

- a. A declaration that the video of the Plaintiff published by the 1st and 2nd Defendants on various social media platforms including TikTok and Facebook and pleaded in paragraph 16, 17, 18 and 19 of the statement of claim are defamatory of the Plaintiff.
- b. An order directed at the Defendants. Compelling them to cause to be published conspicuously and with prominence through the Defendants social media platform an unqualified apology to the Plaintiff.
- c. Aggravated Damages of Twenty Million Ghana Cedis (GH¢ 20,000,000.00) against the Defendants.
- d. An award of general damages against the Defendants for defamation.
- e. Costs (Including legal Fees)
- f. Any further orders this Honorable court may deem fit.

DATED AT "HENEWAA CHAMBERS", SUNYANI, THIS 28TH DAY OF
MARCH, 2025



BRIGHT APRAKU
COUNSEL FOR THE PLAINTIFF
SOLICITOR'S LIC. NO. BAB02528/25
BRIGHT APRAKU
BARRISTER & SOLICITOR
HENEWAA CHAMBERS
SUNYANI
0249159316

THE REGISTRAR,
HIGH COURT
ACCRA

COPY FOR SERVICE ON THE DEFENDANTS