



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

WRIT ISSUED FROM 2026..... SUIT NO:

IN THE SUPERIOR COURT OF JUDICATURE
IN THE HIGH COURT OF JUSTICE
GENERAL JURISDICTION
ACCRA - AD 2026

SUIT NO:

OSAHEN ALEXANDER AFENYO-MARKIN

PLAINTIFF

HOUSE No. 54

ABELEMKPE STREET 3000096131

VRS

SAMUEL ADU GYAMFI

1ST DEFENDANT

A.K.A SAMMY GYAMFI

HSE. NO. UNKNOWN

ACCRA

MULTIMEDIA GROUP LIMITED

2ND DEFENDANT

NO. 1 FARRAR AVENUE

ADABRAKA

***(PLAINTIFFS SHALL DIRECT SERVICE
ON THE DEFENDANTS)***

- g. An order directing the Defendants to cause the retraction and apology to be broadcast on JoyNews and published on the relevant electronic and social-media platforms through which the defamatory publication was disseminated
- h. An order of perpetual injunction restraining the Defendants, their servants, agents, assigns and/or any persons acting under their authority from further publishing the defamatory words or any words to the same or substantially similar effect concerning the Plaintiff
- i. Costs of Fifteen million Ghana cedis (GH15,000,000.00) as compensation thereof
- j. Costs, including legal costs; and
- k. Any further or other reliefs as this Honourable Court may deem fit.

**DATED AT DEHYENA CHAMBERS, NO 25, ONYANSIA STREET, WEST
LEGON, ADJACENT BEULAH METHODIST CHURCH, ACCRA THIS
24th DAY OF AUGUST 2026.**


F. PAA KWESI ABAIDOO, ESQUIRE
BARISTER / SOLICITOR
SUPERIOR COURTS - GHANA 

**F. Paa Kwesi Abaidoo, Esq.
SOLICITOR FOR PLAINTIFF
LICENSE No. eGAR No. 05268/26
CHAMBER LICENCE No. ePP00366/26**

This Writ was issued by F. PAA KWESI ABAIDOO, ESQ
whose address for service is DEHYENA CHAMBERS, NO 25, ONYANSIA
STREET, WEST LEGON, ADJACENT BEULAH METHODIST CHURCH,
ACCRA.

Agent for

Lawyer for the Plaintiff F. PAA KWESI ABAIDOO, ESQ,

F. PAA KWESI ABAIDOO, ESQUIRE
BARISTER / SOLICITOR
SUPERIOR COURTS . GHANA



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(3).

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ACCRA - AD 2026**

SUIT NO.

**OSAHEN ALEXANDER AFENYO-MARKIN
HOUSE No. 54
ABELEMKPE STREET**

PLAINTIFF

VRS

**SAMUEL ADU GYAMFI
A.K.A SAMMY GYAMFI
HSE. NO. UNKNOWN
ACCRA**

1ST DEFENDANT

**MULTIMEDIA GROUP LIMITED
NO.1 FARRAR AVENUE
ADABRAKA**

2ND DEFENDANT

STATEMENT OF CLAIM

1. The Plaintiff is a Ghanaian citizen and a legal practitioner. He is also a prominent public figure and a fourth-term Member of Parliament having risen to become the Majority Leader in the past and currently Minority Leader of Parliament of the Republic of Ghana. Needless to state that the Plaintiff is also a traditional leader in Effutu Traditional area.
2. The Plaintiff has, over the years, built and maintained a reputation for integrity, honesty, professionalism and competence in his legal and public life which culminated in his election as the Third Deputy Speaker of the ECOWAS Parliament. Therefore, the Plaintiff is of both national and international repute.

3. The 1st Defendant is an adult Ghanaian citizen, a legal practitioner and presently the Chief Executive Officer of the Ghana Gold Board (GoldBod). The 1st Defendant is amongst those who qualified in the recent past to practice law in Ghana and is fortunate to find himself as the Chief Executive officer of the Ghana Gold Board (GoldBod).
4. The 2nd Defendant is a private radio and TV broadcast station designated as Joy 99.7 radio and Joy News TV on television and some of their flagship programmes are carried out live on both media.
5. The 2nd Defendant current programme, Newsfile is of wide scope and speculation and has listenership all over Ghana and abroad

BACKGROUND TO DEFAMATION ACTION

6. On Saturday 22 August 2026 edition of the Newsfile hosted by Samson Lardy Anyenini on both radio and TV and other social media channels, the 1st Defendant appeared as a discussant and elected on his own to pour series of defamation on the Plaintiff without any just cause or provocation.
7. In an answer to a question from the host as to why his establishment Ghana Gold Board (GoldBod) applauded itself for making huge profit but denies losses arising from its operations as its liability, the 1st Defendant veered into an unscathing attack on the plaintiff describing him derogatorily as an extortionist.
8. Much more eyebrows were raised when the 1st Defendant justified this awful description by the fact that he seldomly makes attacks on his critics and it was on the first time he was calling someone an extortionist because it was true.
9. Perhaps, the uncharitable words used on the plaintiff could not have hit him more until the 1st Defendant dared him to challenge him or threaten to sue castigating the NPP supporters of the Plaintiff as ignorant of the activities of the Plaintiff.

10. Out of the abundance of caution, the host of the programme, offered the 1st Defendant the opportunity to confirm as to whether he stands by his viewpoint in calling the Plaintiff an Extortionist.
11. Realizing that the entire discussion concerning the Plaintiff was unfair in view of the fact that the Plaintiff was not present to give his view point on the matter, the host seem to have given a frantic apology about the accusation of the Plaintiff by the 1st Defendant but this was not done on behalf of the 1st Defendant as he rendered no apology himself and all the same it did not also take away the fact that the 2nd Defendant medium was used as a tool for dissemination, publication and widespread of this untruth about the Plaintiff.

**PRECISE EXTRACT OF DEFAMATORY WORDS/SENTENCES
UNLEASHED BY 1ST DEFENDANT AGAINST PLAINTIFF**

- a. The 1st Defendant emboldened himself on the programme by boasting as having held more press conference on political issues than anybody, yet he has never ever used the word extortion against any of his critics.
- “You see, my brother, there are many underlining issues between I and Afenyo Markin that you don’t know and those watching don’t know. I have appeared on Newsfile many times. Perhaps in this country, I have held more press conferences on Political issues than anybody. I have ever heard me used the word ‘Extortion’ against any of my critics? Have you ever heard me?”*
- b. To accentuate these derogatory remarks the 1st Defendant continued to say
- “Why would I use this word now? And why have you not heard Afenyo said anything about that, or challenged me or threatened to sue?”*
- c. The incendiary remarks of the 1st Defendant about the Plaintiff on this call became tear provoking when the 1st Defendant implicated the NPP supporters of the Plaintiff to be ignorant about the activities of the Plaintiff and just lending blind support and dared all of them for a

debate calling himself a consummate democrat. The exact words of the 1st Defendant stand as follows

“so, the NPP people talking, there are things you do not know. I will not just me. I am a consummate democrat; I eat and drink debate. I am not worried if you criticize me.”

- d. To exculpate himself, from these clear words of defamation by the 1st Defendant against the Plaintiff, the host Samson Lardy Anyenini asked out of abundance of caution whether the 1st Defendant starkly calls the Plaintiff the Minority Leader an ‘*Extortionist*’ as the responsorial words did not smack of any remorsefulness. It’s on records as follows

“Interrupts YES”. And that is why he cannot comment on that or even challenge me. He cannot because he knows that what I said is true. So, there are many things that you may not have the benefit of”.

- e. Surprisingly, the host did not find the concluding words of the 1st Defendant as chicanery but indeed they were when without any cause, he dared the host a lawyer by profession to take the Plaintiff’s brief and sue him so that he substantiates his claim. Clearly as if his medium is used to solicit for clients. The least said about outward display of power the better. The extract reads;

“Tell him that you want to be his lawyer so that he sues Sammy Gyamfi to substantiate that claim. Tell him. Or tell him that you will give him an interview here and Sammy Gyamfi will come and that he should dare Sammy Gyamfi”.

- f. Perhaps, the 1st Defendant as a lawyer nascent as he may be, is aware that justification is a defense to an act of defamation and therefore concludes that in as much as he concedes his utterances against the plaintiff to be an insult he was speaking about what has happened and the Plaintiff knows. This therefore puts the 1st defendant to the strictest prove thereof. This culled bit of the conversation stands as follows:

“That is not an insult; I am speaking about what has happened and he knows”.

PARTICULARS OF DEFAMATION

12. The Plaintiff states that the words and statements, phrases and description made individually and collectively by the 1st Defendant on him are defamatory of him. The import and essence reflect in the underneath manner.

- a. The categorical statement that Plaintiff is an Extortionist without stating when, where and from whom the Plaintiff has extorted anything fit squarely into defamation.
- b. The statement made by the 1st Defendant as the basis for his attack on the Plaintiff describing same as an underlying issue between him and the plaintiff without disclosing same makes his attacks baseless and sheer vituperations.
- c. The self-presumption by the 1st Defendant that he never called anybody an extortionist before in any political interview and calling the Plaintiff as such for the 1st time means it is true is highly fallacious as 1st time does not connote truthfulness.
- d. The 1st Defendant knows that what he was saying about the Plaintiff was not true and without proof yet he went ahead to make those representations to the unsuspecting public.
- e. Again, the self-presumption that the Plaintiff has not responded to his derogatory attacks means the Plaintiff concedes same to be true. It is very sickening because the 1st mark of dignity is to ignore and respond when it is becoming conspicuously repetitive.
- f. Again, the self-style posture of drinking and eating debate or better still being a consummate democrat is never known in annals of law to be a defense for defamation or justification thereof.
- g. That justification to the tort of defamation does not lie in insistence or repetition of the defamatory piece and that the 1st Defendant refusal to retract and show remorsefulness simply shows how steep and

unflinching he was burnt on damaging the integrity of the Plaintiff regardless of the consequences of his words to the Plaintiff's reputation.

- h. That daring a 3rd party lawyer to represent an injurious party in the law of tort does not in the least mean that the tortfeasor holds sufficient defense, such streetiest approach is known to politics but not law.
- i. That the 1st Defendant demonstrated in the said media session that he was intentional about his conduct since he knew same to be an insult on the Plaintiff. Yet he went ahead to unleash them, and this has reduced the reputation, image and stature of the Plaintiff in the eyes of right-thinking members of the society.

13. Consequently, the Plaintiff says that the words unleashed by the 1st Defendant and broadcast by the 2nd Defendant has been understood by the person who heard, viewed or listened to the publication that

- a. The Plaintiff is an extortionist.
- b. Habitually engages in extortion.
- c. Uses his political position and influence to mount improper pressure on public institutions and public officials.
- d. engages in secret or behind-the-scenes negotiations with public institutions for improper purposes.
- e. improperly intervenes in the affairs of public institutions.
- f. abuses the influence and authority associated with his position as a public figure and political leader.
- g. conducts himself in a manner inconsistent with the standards of honesty and integrity expected of a legal practitioner; and
- h. is a person lacking in the honesty, integrity and probity expected of a person occupying public office.

14. The Plaintiff avers that the derogatory words complained of referred expressly and unmistakably to the Plaintiff.
15. In particular, the 1st Defendant initially referred to Kwamena Afenyo-Markins and when corrected by the host to Markin repeatedly referred to “Afenyo” while making the allegations complained of.
16. The context of the programme made it clear to the host, the other participants and the listening public that the person being referred to be no other than the Plaintiff.
17. The defamatory words were published by the 1st Defendant to the host of the programme, the other participants and the listening public of JoyNews.
18. The said publication was further made available to persons who subsequently watched, listened to, downloaded, shared and/or otherwise accessed recordings of the programme.
19. The Plaintiff says that a video recording containing the defamatory statements has subsequently been widely circulated on social media platforms X, Facebook and YouTube and other electronic platforms.
20. The publication has therefore reached a substantial number of persons and continues to cause damage to the Plaintiff’s reputation.

DENIAL OF ALLEGATION OF EXTORTION

21. The Plaintiff avers that the words complained of are false.
 - a. The Plaintiff is not an extortionist and has never engaged in extortion as alleged by the 1st Defendant.
 - b. The Plaintiff has not engaged in any conduct of the nature alleged by the 1st Defendant.

1ST DEFENDANT ACTUATED BY MALICE

22. The Plaintiff says that the defamatory words were published maliciously.

PARTICULARS OF MALICIOUS PUBLICATION

- a. the deliberate use of the grave and pejorative word “extortionist” against the Plaintiff because of his criticism against the financial losses of Ghana Gold Board of which the 1st defendant is the head;
- b. the repetition of the allegation after the host had cautioned/questioned the 1st Defendant without disclosing same just to create disaffection for the Plaintiff;
- c. the 1st Defendant’s repeated assertion that he possessed evidence against the Plaintiff;
- d. the 1st Defendant’s repeated challenge to the Plaintiff to “dare” him;
- e. were presented as established facts rather than opinions; and
- f. the publication of the allegations in circumstances calculated to expose the Plaintiff to public contempt, ridicule, disrepute and opprobrium rustica.

23. The Plaintiff says that the conduct of the 1st Defendant was calculated to injure the Plaintiff’s reputation and standing.

DAMAGE TO THE PLAINTIFF’S REPUTATION

- a. The Plaintiff is a legal practitioner and a senior political figure whose professional and public reputation is of considerable importance.
- b. An allegation that the Plaintiff is an extortionist is particularly grave when made against a legal practitioner and a person occupying a senior position in Parliament of Ghana.

- c. The publication has exposed the Plaintiff to hatred, ridicule, contempt and public disapprobation.
 - d. The publication has also created the false impression that the Plaintiff uses his public position and political influence to extort and improperly negotiate with public officials.
 - e. The Plaintiff says that the allegations have caused serious injury to his character, reputation, professional standing and public image.
 - f. The Plaintiff shall rely upon the wide circulation of the publication and the subsequent viral dissemination of the recording in proof of the extent of the damage caused.
24. The Plaintiff says that the defamatory words were broadcast through the 2nd Defendant's TV station during the programme "Newsfile".
25. The 2nd Defendant thereby published and/or caused/or facilitated the publication of the defamatory words to its listening audience.
26. The 2nd Defendant knowing the legal consequences of the words unleashed by the 1st Defendant through its medium took no step to stop him or failed to deactivate his microphone but allowed him to continue unabated.
27. WHEREFORE the Plaintiff claims against the Defendants, jointly and severally, the following reliefs:
- a. General damages for libel
 - b. Aggravated damages
 - c. Exemplary damages
 - d. An order directing the Defendants to publish a full, unconditional and unequivocal retraction of the defamatory statements
 - e. An order directing the Defendants to publish a full, unconditional and unequivocal public apology to the Plaintiff

- f. An order directing that the retraction and apology be published and/or broadcast with substantially the same prominence and reach as the original publication
- g. An order directing the Defendants to cause the retraction and apology to be broadcast on JoyNews and published on the relevant electronic and social-media platforms through which the defamatory publication was disseminated
- h. An order of perpetual injunction restraining the Defendants, their servants, agents, assigns and/or any persons acting under their authority from further publishing the defamatory words or any words to the same or substantially similar effect concerning the Plaintiff
- i. Costs of Fifteen million Ghana cedis (GH15,000,000.00) as compensation thereof
- j. Costs, including legal costs; and
- k. Any further or other reliefs as this Honourable Court may deem fit.

DATED AT DEHYENA CHAMBERS, NO 25, ONYANSIA STREET, WEST LEGON, ADJACENT BEULAH METHODIST CHURCH, ACCRA THIS

24th DAY OF AUGUST 2026.


 F. PAA KWESI ABAIDOO, ESQUIRE
 BARISTER / SOLICITOR
 SUPERIOR COURTS - GHANA 

**F. Paa Kwesi Abaidoo, Esq.
 SOLICITOR FOR PLAINTIFF
 LICENSE No. eGAR nO. 05268/26
 CHAMBER LICENCE No. ePP00366/26**

**THE REGISTRAR
 THE HIGH COURT OF JUSTICE
 (GENERAL JURISDICTION)
 ACCRA**

AND TO THE ABOVE-NAMED DEFENDANTS