



WRIT OF SUMMONS

(Order 2 rule 3(1))

WRIT ISSUED FROM ACCRA 24/11/2025

SUIT No. GJ/0169/2026

IN THE SUPERIOR COURT OF JUDICATURE

IN THE HIGH COURT OF JUSTICE

ACCRA - A.D. 2025

BETWEEN

ERIC ADJEI

PLAINTIFF

4th Circular Street, Cantonments Accra

Nii Armah Olennu Street

AND

PRINCE PRAH

DEFENDANT

(Unnumbered House, Accra)

(Plaintiff shall direct service)

To

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 24th day of November,

2025

Chief Justice of Ghana

P. BAFFOE-BONNIE
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 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).

HIGH COURT ACCRA

STATEMENT OF CLAIM

Plaintiff claims against the defendant as follows:

- a. A declaration that the publications complained of, and in particular the headline words **“Is Eric Adjei in charge of NEIP?”** and **“Coming Up: Visa Racketeering Scandal Hits NEIP”**, together with the prominent display of the Plaintiff’s photograph and identification as Chief Executive Officer of NEIP, as published by the Defendant in the **“Daybreak Newspaper”** in print and online, are defamatory of the Plaintiff.
- b. An order by this Honourable Court directing the Defendant forthwith to remove and/or cause to be removed all the offending publications concerning the Plaintiff that are the subject matter of this action, from all his social media pages and platforms, websites and all digital archives under his control.
- c. An order directing the Defendant to render and publish a full, unqualified and unequivocal retraction and apology to the Plaintiff via the same print and online media, social media platforms and digital archives that were used to post and circulate the offending publications, with the same or similar prominence as the offending publications.
- d. An order of perpetual injunction restraining the Defendants, whether by himself, agents, servants, privies or assigns, from further writing, printing, publishing or causing to be written, printed or published the same or any similar defamatory words concerning the Plaintiff.
- e. An order directing the Defendant to sign and file an undertaking, in terms to be approved by this Honourable Court, that they will cease and desist from publishing, circulating or causing to be published any further defamatory statements about the Plaintiff.
- f. General damages in the sum of Five Million Ghana Cedis (GHC 5,000,000.00) for defamation.

- g. Aggravated damages for the Defendant's malicious and/or reckless conduct, including his refusal to retract and apologise and his continued maintenance of the defamatory publications.
- h. Exemplary damages to punish the Defendant and to deter him and others from repeating such malicious and reckless conduct.
- i. Costs, including the legal costs of the Plaintiff's Counsel.
- j. Interest on any monetary awards at the prevailing court or commercial rate from the date of judgment until final payment.
- k. Any further or other reliefs which this Honourable Court may deem fit.



This Writ was issued by

CECIL METTLE-NUNOO ESQ.

Who address of service is
PARTNERS

METTLE-NUNOO, QUARTEY &

PLOT NO.154, TESHIE LINK ROAD
TESHIE-LEKMA, ACCRA.



Agent for PLAINTIFF

Address Number and date of lawyer's current licence. eGAR 02069/25

Lawyer for Plaintiff xxxxxxxx

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 on the day of

Signed.....

Address..... NOTE:

if the plaintiff's 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 be the plaintiff, his lawyer or his agent.

24/11/25
Filed on.....
at 3:00 am/pm
Registrar
GENERAL JURISDICTION LCC-ACCRA

IN THE SUPERIOR COURT OF JUDICATURE
IN THE HIGH COURT OF JUSTICE
ACCRA - A.D. 2025

SUIT NO.

ERIC ADJEI

4th Circular Street, Cantonments Accra
Nii Armah Olennu Street

PLAINTIFF

AND

PRINCE PRAH

(Unnumbered House, Accra)

(Plaintiff shall direct service)

DEFENDANT

STATEMENT OF CLAIM

1. The Plaintiff is a Lawyer and a Civil Servant who has been at the helm of the National Entrepreneurship and Innovation Programme (NEIP) as its Chief Executive Officer since 24th Januar, 2025 and has, at all material times, enjoyed a good name and reputation in Ghana and beyond.
2. The Defendant is, and was at all material times, a journalist and the Editor-in-Chief of a newspaper called "Daybreak Newspaper" published and circulated in Accra and throughout Ghana, and is sued as the person responsible for the content of the said newspaper in print and online.
3. The Plaintiff avers that on or about the 4th day of November 2025 and the 11th day of November 2025, the Defendant authored and/or approved, printed and published, or caused to be printed and published, two defamatory articles about the Plaintiff in the "Daybreak Newspaper", which were given headline prominence with the Plaintiff's photograph prominently displayed on the front page of the newspaper, and replicated on the Defendant's online and social media platforms, without any factual basis.

PARTICULARS OF DEFAMATION

- i. On the 4th of November 2025, the Defendant falsely and maliciously printed and published, or caused to be printed and published, on the front page of the

“Daybreak Newspaper” and on his online platforms, of and concerning the Plaintiff, the following headline words: “Is Eric Adjei in charge of NEIP?”

- ii. On the 11th of November 2025, the Defendant falsely and maliciously printed and published, or caused to be printed and published, on the front page of the “Daybreak Newspaper” and on his online platforms, of and concerning the Plaintiff, the following headline words: “Coming Up: Visa Racketeering Scandal Hits NEIP”.
 - iii. The Plaintiff avers that the said words, taken in their natural and ordinary meaning and in the context of the publications as a whole, together with the use of his name, photograph and office, were understood to mean, and were intended and understood by right-thinking members of the public to mean, that the Plaintiff:
 - a. is engaged in visa racketeering and other criminal conduct;
 - b. is abusing and/or has abused his high public office as Chief Executive Officer of NEIP for corrupt and improper purposes; and
 - c. is dishonest, corrupt, untrustworthy and unfit to hold public office.
 - iv. The Plaintiff avers that by giving the impugned publications headline/front page prominence, attaching his photograph and circulating the same widely in print and on online and social media platforms, the Defendant ensured that the defamatory material received very wide coverage in Ghana and beyond.
4. The Plaintiff avers that the said publications complained of constitute libel and are wholly false, unjustified and without any lawful or factual basis whatsoever.
 5. The Plaintiff avers that the defamatory publications made by the Defendant are offensive, were published recklessly and/or were actuated by malice, and were calculated to injure and have in fact gravely injured his hard-won reputation as a Lawyer and Chief Executive Officer of NEIP.

PARTICULARS OF MALICE

- i. The Defendant published the said defamatory words knowing them to be false and/or recklessly without caring whether they were true or false.
 - ii. The Defendant published the said defamatory words with full knowledge of the damage and injury that such allegations of “visa racketeering” and abuse of public office would cause to the Plaintiff’s reputation as a public officer and Lawyer.
 - iii. The Defendant deliberately gave the said publications sensational headline and front-page prominence, with the Plaintiff’s photograph, and caused the same to be widely disseminated online, in order to maximise publicity for the defamatory allegations and thereby exacerbate the damage to the Plaintiff’s reputation.
6. By a letter dated the 11th of November 2025, the Plaintiff, acting through his Solicitors, demanded that the Defendant ceases and desists from such defamatory publications, remove the offending material, and publish a full and unequivocal retraction and apology, but the Defendant has ignored and/or deliberately refused to comply.
 7. The Plaintiff avers that, by reason of the matters aforesaid, the actions of the Defendant has caused him severe reputational damage.
 8. The Plaintiff avers that, by reason of the publication and wide circulation of the said articles in print and online, his character and reputation have been gravely damaged and he has suffered considerable damage, distress, humiliation and embarrassment.

PARTICULARS OF DAMAGE

- i. The Plaintiff states that, as a result of the publications made by the Defendant, the following categories of persons have viewed and continue to view the Plaintiff in a poor light:
- ii. Members of the Ghanaian public and beyond who have read or had sight of the publications and who now consider or are likely to consider the Plaintiff to be engaged in criminal, corrupt and dishonest activities.

- iii. Professional colleagues, business and development partners, public officials and other esteemed members of society who previously held the Plaintiff in high regard, but who now doubt his integrity and fitness to hold high public office.
9. Plaintiff avers that the said publications, in their natural and ordinary meaning and (where applicable) by innuendo, portray and have been understood to portray the Plaintiff as dishonest, corrupt, criminally minded and unfit to hold public office.
10. Plaintiff avers further that the defamatory and maliciously false information contained in the said publications has subjected him to public odium, contempt and ridicule and has caused, and continues to cause, serious harm to his reputation, dignity and professional standing, including potential and actual harm to his present and future career prospects.
11. It is the contention of the Plaintiff that despite having caused his Solicitors to write to the Defendant on the 11th of November 2025 to cease and desist from such defamatory publications, to remove the same and to retract and apologise, the Defendant has ignored and/or deliberately refused to take down the offensive publications or offer any apology.
12. Plaintiff also avers that the said letter, which requested a full retraction and an unqualified apology for the injurious and defamatory statements published by the Defendant, has not yielded any results.
13. Plaintiff avers further that unless this Honourable Court makes the necessary orders to restrain and deter the Defendant, he will continue to cause irreparable damage to the Plaintiff's reputation and dignity.
14. WHEREFORE the Plaintiff has suffered damage and claims against the Defendant as follows:
 1. A declaration that the publications complained of, and in particular the headline words "Is Eric Adjei in charge of NEIP?" and "Coming Up: Visa Racketeering Scandal Hits NEIP", together with the prominent display of the Plaintiff's

photograph and identification as Chief Executive Officer of NEIP, as published by the Defendant in the “Daybreak Newspaper” in print and online, are defamatory of the Plaintiff.

- m. An order by this Honourable Court directing the Defendant forthwith to remove and/or cause to be removed all the offending publications concerning the Plaintiff that are the subject matter of this action, from all his social media pages and platforms, websites and all digital archives under his control.
- n. An order directing the Defendant to render and publish a full, unqualified and unequivocal retraction and apology to the Plaintiff via the same print and online media, social media platforms and digital archives that were used to post and circulate the offending publications, with the same or similar prominence as the offending publications.
- o. An order of perpetual injunction restraining the Defendant, whether by themselves, his agents, servants, privies or assigns, from further writing, printing, publishing or causing to be written, printed or published the same or any similar defamatory words concerning the Plaintiff.
- p. An order directing the Defendants to sign and file an undertaking, in terms to be approved by this Honourable Court, that they will cease and desist from publishing, circulating or causing to be published any further defamatory statements about the Plaintiff.
- q. General damages in the sum of Five Million Ghana Cedis (GHC 5,000,000.00) for defamation.
- r. Aggravated damages for the Defendant’s malicious and/or reckless conduct, including his refusal to retract and apologise and his continued maintenance of the defamatory publications.
- s. Exemplary damages to punish the Defendant and to deter them and others from repeating such malicious and reckless conduct.

- t. Costs, including the legal costs of the Plaintiff's Counsel.
- u. Interest on any monetary awards at the prevailing court or commercial rate from the date of judgment until final payment.
- v. Any further or other reliefs which this Honourable Court may deem fit.

DATED AT METTLE-NUNOO, QUARTEY AND PARTNERS, THIS 14TH DAY OF NOVEMBER 2025.



.....
CECIL METTLE-NUNOO ESQ.

LAWYER FOR PLAINTIFF

PRACTISING LICENSE No eGAR 02069/25

THE REGISTRAR
HIGH COURT,
ACCRA



AND COPY FOR SERVICE ON THE DEFENDANT HEREIN