



WRIT OF SUMMONS, NOTICE OF WHICH IS TO BE SERVED OUTSIDE OF THE JURISDICTION AND ISSUED PURSUANT TO LEAVE OF THE COURT DATED 23RD

JULY 2025 (Order 7 rule 7(5))

WRIT ISSUED FROM... ACCRA 23/07/2025 GJ/1038/2025 SUIT No.

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

BETWEEN

.....
SAMUEL GYAMFI ... **PLAINTIFF**
[Also Known as "Sammy Gyamfi"]
7 MANGO LK GL-051-4872
TSE-ADDO - ACCRA

To

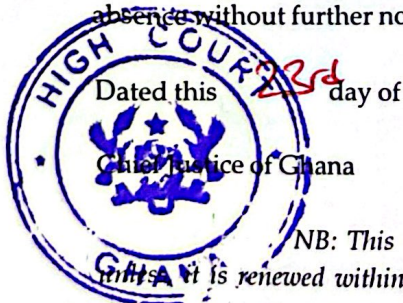
AND

VALENTINA NANA AGYEIWAA ... **DEFENDANT**
[A.K.A. AFIA SCHWARZENEGGER]
3650 BRONX BLVD APT 6H,
BRONX, NEW YORK, 10467,
UNITED STATES OF AMERICA

AN ACTION having been commenced against you by the issue of this writ by the above-named Plaintiff. **SAMUEL GYAMFI (ALSO KNOWN AS "SAMMY GYAMFI")**

YOU ARE HEREBY COMMANDED that within EIGHT DAYS (8) after service of this writ on you inclusive of the day of service you do cause an appearance to be entered for you **VALENTINA NANA AGYEIWAA [A.K.A. AFIA SCHWARZENEGGER]**

AND TAKE NOTICE that in default of your so doing, judgment may be given in your absence without further notice to you.



P. BAFFOE-BONNIE
(AG. CHIEF JUSTICE)

NB: This writ is to be served within twelve calendar months from the date of issue
It is renewed within six calendar months from the date of that renewal.

SEALED.....
.....
.....
HIGH COURT ACCRA

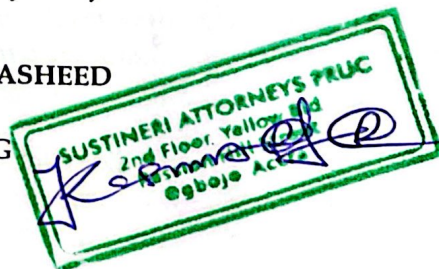
STATEMENT OF CLAIM

The Plaintiffs' claim against Defendants is for:

- a. A declaration that the Defendant's publication which contained the following statements in the Asante Twi language "...Mo nkankyere Sammy Gyamfi yere se merekyea no. Ne kunu gusu ereto cars ema girls ewo Legon. Me kura list no. Nea ebama wo ahunu se mekura list no, mere be fre me informant no. Mere fre me informant. Akumaa, ye wild, ye wild, Sammy Gyamfi girl no, ne din no meyere afe, sane fa send me, aane, na fa list no nyinaa bra, aane fa send me, fa ni nyinaa. Me retwen.... Enti monka nkyere Sammy Gyamfi yere no se ne kunu no ereye adwuma wo Legon paa, oreya adwuma yie paa. Na agya, ne yere no koraa eden na obeka, naano yie ara, neyere no nua Vida yi, se wabeto fie wo US. Aane, ne yere no nua ketewa kora abeto fie wo US..." to wit "...Tell Sammy Gyamfi's wife that I am greeting her. Her husband is still buying cars for girls in Legon. I am holding the list. What will make you know that I am holding the list is that I am going to call my informant...I am calling my informant. Akumaa be wild, be wild, that Sammy Gyamfi's girl, I have forgotten her name, send it to me again, yes and add all the list. Yes, send it to me. Send everything. I am waiting. So, tell Sammy Gyamfi's wife that her husband is doing a lot of work at Legon, he is really working there. But truly, what will his wife even say. Just a few days ago, his wife's sister Vida, came to buy a house in the US. Yes, even his wife's younger sister has bought a house in the US..." constitutes defamation of Plaintiff's character.
- b. General Damages against the Defendant herein for defamation of character.
- c. An order of this Honourable Court in the nature of a perpetual injunction restraining the Defendant herein from making any further publication and/or causing to be printed, published, distributed, and/or otherwise circulated same and/or other similar defamatory words touching and/or otherwise concerning the Plaintiff herein.
- d. Exemplary damages of Ten Million Ghana Cedis (GHS 10,000,000.00) against the Defendant.
- e. A retraction and an unqualified apology by the Defendants to be published on the front and back pages of *The Daily Graphic Newspaper* on three (3) consecutive occasions and same to be published on the TikTok mobile application platform in addition to any and all other media platforms that the impugned publication was made by the Defendant and give it the same prominence as the statements complained of.
- f. Costs inclusive of Counsel's fees.
- g. Any such further or other orders as this Honourable Court may deem fit.

This writ was issued by
whose address for service is

SAANI MAHMOUD ABDUL-RASHEED
SUSTINERI ATTORNEYS PRUC
2ND FLOOR, YELLOW BUILDING
PASSION HILL STREET
OGBOJO - ACCRA



Agent for

Address Number and date of lawyer's current licence.

BP: 3000047438

TIN: P0009505040

LIN: eGAR03351/25

Lawyer for the Plaintiff **SAANI MAHMOUD ABDUL-RASHEED** whose address is **SUSTINERI**

Filed on 23/07/25
at 1:00 pm Registrar
GENERAL JURISDICTION LCC-ACCRA

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

SUIT NO:.....

BETWEEN:

SAMUEL GYAMFI	]	PLAINTIFF
[Also Known as "Sammy Gyamfi"]	]	
7 MANGO LK GL-051-4872	]	
TSE-ADDO - ACCRA	]	

AND

VALENTINA NANA AGYEIWAA	]	DEFENDANT
[A.K.A. AFIA SCHWARZENEGGER]	]	
3650 BRONX BLVD APT 6H,	]	
BRONX, NEW YORK, 10467,	]	
UNITED STATES OF AMERICA	]	

STATEMENT OF CLAIM

1. Plaintiff is a Ghanaian, a lawyer, an economic policy analyst and the Chief Executive Officer of the Ghana Gold Board (GoldBod).
2. Defendant is a Ghanaian citizen and a popular social media personality.
3. Plaintiff repeats paragraph 2 above and aver that by reason of the Defendant's popularity on social media she has considerable following on various social media platforms especially on *TikTok* where she has about Five Hundred and Twenty-Six Thousand (526.5k) followers.
4. Plaintiff avers that in addition to his current role as the Chief Executive Officer of the Ghana Gold Board (GoldBod), he is the National Communications Officer of the governing political party, the National Democratic Congress (NDC).
5. Plaintiff repeats paragraph 4 above and say that in the past, he has served as the President of the Student Representative Council of the Ghana School of Law, the Communications Director for Exton Cubic Limited, the Spokesperson of the Former Mayor of Kumasi and has held various roles in social and political leadership in Ghana.

6. Plaintiff avers that apart from his various academic pursuits in Ghana, he is also an alumnus of the Harvard Kennedy School having undergone Executive Education Training in various Public Leadership modules at the said school.
7. Plaintiff avers that due to his distinguished service to the National Democratic Congress and his role in public advocacy, he has a huge following and is regarded as an inspiring young leader of integrity and a leading voice in public advocacy within the Ghanaian political space.
8. Plaintiff further avers that his consistent engagements in national discourse and political advocacy has earned him widespread recognition as a credible and influential voice within Ghana's socio-political landscape.
9. Plaintiff avers that on 16th July 2025, his attention was drawn to a video publication by the Defendant which contained certain defamatory materials about the Plaintiff.
10. Plaintiff repeats paragraph 9 above and aver that the Defendant operating under the TikTok handle "*Queen Afia Kande Schwar @queen schwar*" published the following statement touching and concerning the Plaintiff's reputation:

"...Mo nkankyere Sammy Gyamfi yere se merekyea no. Ne kunu gusu ereto cars ema girls ewo Legon. Me kura list no. Nea ebama wo ahunu se mekura list no, mere be fre me informant no. Mere fre me informant. Akumaa, ye wild, ye wild, Sammy Gyamfi girl no, ne din no meyere afi, sane fa send me, aane, na fa list no nyinaa bra, aane fa send me, fa ni nyinaa. Me retwen.... Enti monka nkyere Sammy Gyamfi yere no se ne kunu no ereye adwuma wo Legon paa, oreye adwuma yie paa. Na agya , ne yere no koraa eden na obeka, naano yie ara, neyere no nua Vida yi, se wabeto fie wo US. Aane, ne yere no nua ketewakora abeto fie wo US..." to wit "...Tell Sammy Gyamfi's wife that I am greeting her. Her husband is still buying cars for girls in Legon. I am holding the list. What will make you know that I am holding the list is that I am going to call my informant...I am calling my informant. Akumaa be wild, be wild, that Sammy Gyamfi's girl, I have forgotten her name, send it to me again, yes and add all the list. Yes, send it to me. Send everything. I am waiting. So, tell Sammy Gyamfi's wife that her husband is doing a lot of work at Legon, he is really working there. But truly, what will his wife even say. Just a few days ago, his wife's sister Vida, came to buy a house in the US. Yes, even his wife's younger sister has bought a house in the US..."

11. Plaintiff repeats paragraph 10 above and says further that the Defendant published the said defamatory statements in the honest belief and reasonable expectation that same was going to be republished, distributed and/or otherwise circulated by others on various social media platforms to defame Plaintiff.
12. Plaintiff repeats paragraph 11 above and says that the said defamatory statement was subsequently republished on various social media platforms.

13. Plaintiff avers that the Defendant, with full knowledge that the above statements were palpably false, published and/or otherwise allowed others to republish, circulate and distribute the said publication so as to achieve her desired aim of defaming Plaintiff.
14. Plaintiff avers that the publication by the Defendant complained of and particularized in paragraph 10 above was meant to be and was actually understood by the Ghanaian public to mean that
 - a. *Plaintiff is immoral, unfaithful to his wife and to his marital vows, wasteful and irresponsible in the use of his finances, corrupt and unworthy of public trust.*
 - b. *Plaintiff is an adulterous man, for which reason he has a list of girlfriends on the campus of the University of Ghana despite being married.*
 - c. *Plaintiff is a person who abuses his position and resources to indulge in inappropriate relationships with young women on university campuses.*
 - d. *Plaintiff has acquired properties for his wife's sister in the United States of America.*
 - e. *Plaintiff is driven by lust, vanity, and immorality and to that extent a bad example to the youth and the society at large.*
15. Plaintiff repeats paragraphs 10, 11, 12, 13 and 14 above and says further that the publications complained of are not only false but are also malicious and deliberately contrived to damage his hard-earned reputation and cause the Ghanaian public to see him as morally depraved and without any scruples.
16. Plaintiff avers that he has no girlfriend(s) at the University of Ghana and has not at any time purchased vehicles for any so-called girlfriends as claimed by Defendant.
17. Plaintiff avers further that he has not purchased any property in the United States of America or anywhere else for his wife or his wife's sister.
18. Plaintiff avers that his wife does not even have any sister called "Vida" as published by the Defendant, and shall contend further that any reasonable enquiry would have disclosed this fact to the Defendant.
19. Plaintiff further avers that the Defendant published the impugned defamatory statements with the full knowledge that the said statements were false and defamatory and/or with an unpardonably reckless disregard for the truth.
20. Plaintiff avers that since the impugned publications were made by the Defendant, he has been inundated with numerous calls and has had to answer very embarrassing and difficult questions and inquiries from different persons, including high ranking officials of the Office of the President, very distinguished members of the NDC , associates, friends, concerned family members and many others both in Ghana and abroad as to the contents of the defamatory statements referred to in paragraphs 10 above.

21. Plaintiff avers that by reason of the publication complained of and the matters particularized in paragraph 10 above, his reputation has seriously been sullied, and he has been made a subject of public ridicule, opprobrium, derision, and contempt.
22. Plaintiff avers that the Defendant acted maliciously in publishing the said defamatory words which were designed to cause and did in fact cause Plaintiff profound distress, anxiety, embarrassment, hatred, ridicule, derision, and public odium.

PARTICULARS OF MALICE

- a. *The Defendant deliberately published the said defamatory statements and caused same to be widely circulated and distributed, knowing very well that same were false and/or with no honest belief in the truthfulness of the claims, in order to whip up public sentiments against the Plaintiff.*
 - b. *The Defendant's choice of language and platform, as well as the sensational manner in which the statements were presented, points to a deliberate and targeted attempt to damage the Plaintiff's reputation.*
 - c. *The Defendant's conduct was informed by ill-will, spite and personal animosity, and was designed to cause maximum damage to the Plaintiff.*
23. Plaintiff will rely on the following facts and matters in support of his claim for exemplary damages:
- a. *Defendant knew or ought to have known that the allegations contained in paragraph 10 above and authored by her were false, malicious, and consequently defamatory.*
 - b. *Defendant published the said defamatory statements and by that, permitted other persons and media organizations to republish and/or circulate same in order to achieve her desired maximum aim of defaming the Plaintiff.*
 - c. *Defendant knew and/or ought to have known that the defamatory publication she published concerning the Plaintiff could potentially sully Plaintiff's reputation.*
 - d. *Defendant had no honest belief in the truthfulness of the statements she made and knew she had no evidence to prove same at the time she made the impugned publications referred to in paragraph 10.*
 - e. *Defendant acted with deliberate malice and sought to exploit the Plaintiff's status as a public figure to generate maximum scandal and by that benefit from a growth*

in her social media standing in terms of following and related commercial advantages that comes with such increase in following.

24. Plaintiff contends that as a direct consequence of the false and malicious publication by the Defendant referred to in paragraph 10 above, his personal and professional reputation has suffered significant harm as it has caused right-thinking members of society, including professional colleagues, associates, and members of the public, to question his morality, integrity, and character.
25. Plaintiff avers that unless restrained by this Honourable Court in the terms prayed for in the instant suit, the Defendant will continue to publish and/or cause to be published the said words complained of and/or words of similar tenor, nature and effect to defame him.

WHEREFORE Plaintiff claims against Defendant as follows:

- a. *A declaration that the Defendant's publication which contained the following statements in the Asante Twi language "...Mo nkankyere Sammy Gyamfi yere se merekyea no. Ne kunu gusu ereto cars ema girls ewo Legon. Me kura list no. Nea ebama ma wo ahunu se mekura list no, mere be fre me informant no. Mere fre me informant. Akumaa, ye wild, ye wild, Sammy Gyamfi girl no, ne din no meyere afi, sane fa send me, aane, na fa list no nyinaa bra, aane fa send me, fa ni nyinaa. Me retwen.... Enti monka nkyere Sammy Gyamfi yere no se ne kunu no ereye adwuma wo Legon paa, oreye adwuma yie paa. Na agya, ne yere no koraa eden na obeka, naano yie ara, neyere no nua Vida yi, se wabeto fie wo US. Aane, ne yere no nua ketewakora abeto fie wo US..." to wit "...Tell Sammy Gyamfi's wife that I am greeting her. Her husband is still buying cars for girls in Legon. I am holding the list. What will make you know that I am holding the list is that I am going to call my informant...I am calling my informant. Akumaa be wild, be wild, that Sammy Gyamfi's girl, I have forgotten her name, send it to me again, yes and add all the list. Yes, send it to me. Send everything. I am waiting. So, tell Sammy Gyamfi's wife that her husband is doing a lot of work at Legon, he is really working there. But truly, what will his wife even say. Just a few days ago, his wife's sister Vida, came to buy a house in the US. Yes, even his wife's younger sister has bought a house in the US..." constitutes defamation of Plaintiff's character.*
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- e. A retraction and an unqualified apology by the Defendants to be published on the front and back pages of **The Daily Graphic Newspaper** on three (3) consecutive occasions and same to be published on the TikTok mobile application platform in addition to any and all other media platforms that the impugned publications were made by the Defendant and give it the same prominence as the statements complained of.
- f. Costs inclusive of Counsel's fees.
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**DATED AT SUSTINERI ATTORNEYS PRUC, 2ND FLOOR, YELLOW BUILDING,
PASSION HILL STREET, OGBOJO, ACCRA, THIS 25TH FEBRUARY 2024**


SAANI MAHMOUD ABDUL-RASHEED
LAWYER FOR PLAINTIFF
LIN: eGAR03351/25
BP: 3000047438
TIN: P0009505040

**THE REGISTRAR
THE HIGH COURT
GENERAL JURISDICTION
ACCRA**

AND FOR SERVICE ON THE ABOVE-NAMED DEFENDANT