

IN THE SUPERIOR COURT OF JUDICATURE
IN THE HIGH COURT OF JUSTICE
(GENERAL JURISDICTION 8)
ACCRA-GHANA
A. D. 2025

SOLOMON DAVID ABOAGYE
PEACE FM, ABEKA JUNCTION
ACCRA.

SUIT NO. GJ 0909/2024

vs.

PLAINTIFF/APPLICANT

1. VALENTINA NANA AGYEIWAA
ALIAS AFIA SCHWARZENEGGER
COMMUNITY 18, TEMA
2. CHARLES NII ARMAH MENSAH JR.
ALIAS SHATTA WALE
H/NO. J211
BENJAMIN SOWAH AVENUE
ADJIRINGANOR, ACCRA

... DEFENDANTS

(SGD)

**H/L ELLEN L. S. MIREKU
JUSTICE OF THE HIGH COURT**

ORDER FOR SUBSTITUTED SERVICE

UPON READING the affidavit of **ADAM DANSO NYARKO** of Accra in the Greater Accra Region sworn to and filed on the 1st Day of July, 2025 in Support of Motion Ex-parte for Order for Substituted Service:

AND UPON HEARING AMESIKA APPREY with
AMA GYAPOMAA NKUAH holding brief for SAMSON
LARDY ANYENINI ESQ., Counsel for and on behalf of the
Plaintiff/Applicant herein;

IT IS HEREBY ORDERED THAT a copy of this ORDER, MOTION ON NOTICE FOR JUDGMENT IN DEFAULT OF APPEARANCE filed on 7th April, 2025 and a HEARING NOTICE for 13th August, 2025 be served on Defendants by Substituted Service by posting copies thereof at the following locations namely:

1. The Notice Board of the Law Courts Complex Building at Accra

Where they shall remain posted for Ten (10) days

shall remain posted for Ten (10) days.

1

PI. 30125 DEPUTY REGISTRAR
ERVICE OF HIGH COURT
FEDERAL JURISDICTION, 1961

2. By sending copies to 1st Defendant at owontaa@gmail.com
3. By sending copies to 1st Defendant on TikTok: @queenschwarz
4. By sending copies to 2nd Defendant at Instagram: shattawalegh/shattawalenima
5. By sending copies to 2nd Defendant's Snapchat @ shattawalenima2
6. By serving copies on Nkrabeah & Associates, Citizens Chambers, H/No. C688/3 Kaanyemi Crescent Link, Asylum Down, Accra.

GIVEN UNDER MY HAND AND THE SEAL OF THE
HIGH COURT, GENERAL JURISDICTION DIVISION,
ACCRA ON THE 21ST DAY OF JULY, 2025.

(SGD)
DORIS DANSOWAAH
(REGISTRAR)

07/07/25
CERTIFIED TRUE COPY
DEPUTY REGISTRAR
HIGH COURT
GENERAL JURISDICTION LCC-ACCRA,

IN THE SUPERIOR COURT OF JUDICATURE
IN THE HIGH COURT OF JUSTICE
(GENERAL JURISDICTION 8)
ACCRA-GHANA
A. D. 2024

SUIT NO. GJ 0909/2024

SOLOMON DAVID ABOAGYE
PEACE FM, ABEKA JUNCTION
ACCRA.

... PLAINTIFF/APPLICANT

VS.

1. VALENTINA NANA AGYEIWA
ALIAS AFIA SCHWARZENEGGER
COMMUNITY 18, TEMA
2. CHARLES NII ARMAH MENSAH JR.
ALIAS SHATTA WALE
H/NO. J211
BENJAMIN SOWAH AVENUE
ADJIRINGANOR, ACCRA

... DEFENDANTS

(SGD)

H/L ELLEN L. S. MIREKU
JUSTICE OF THE HIGH COURT

ORDER FOR SUBSTITUTED SERVICE

UPON READING the affidavit of **SOLOMON DAVID ABOAGYE** of Peace FM Abeka Junction, Accra in the Greater Accra Region sworn to and filed on the 23rd Day of October, 2024 in Support of Motion Ex-parte for Order for Substituted Service;

AND UPON HEARING ETORNAM CALEB AFUTU ESQ. with NANA AKOSUA AMPADU-ABABIO holding brief of SAMSON LARDY ANYENINI ESQ., Counsel for and on behalf of the Plaintiff/Applicant herein;

IT IS HEREBY ORDERED THAT a copy of this ORDER, WRIT OF SUMMONS AND STATEMENT OF CLAIM filed on 24th July, 2024 be served on Defendants by Substituted Service by posting copies thereof at the following locations namely:

1. The Notice Board of the Law Courts Complex Building at Accra.

[Handwritten signature]
CERTIFIED TRUE COPY
REGD
HIGH COURT
GENERAL JURISDICTION 8 ACCRA
Put [initials]

2. By posting copies at the last known place of abode of the 1st Defendant at Community 18, Tema. **(PLAINTIFF TO DIRECT SERVICE)**

3. By posting copies at the last known place of abode of the 2nd Defendant at H/No. J211, Benjamin Sowah Avenue, Adjiringanor, Accra. **(PLAINTIFF TO DIRECT SERVICE)**

Where they shall remain posted for Fourteen (14) days.

4. By sending copies to owontaa@gmail.com

5. By sending copies to TikTok: @queenschwarz

6. By serving copies on Nkrabeah & Associates, Citizens Chambers, H/No. C688/3 Kaanyemi Crescent Link, Asylum Down, Accra.

7. By sending copies to Instagram: shattawalegh/shattawalenima

8. By sending copies to Snapchat @ shattawalenima2

9. One-time Newspaper Publication in any of the National Dailies.

GIVEN UNDER MY HAND AND THE SEAL OF THE HIGH COURT, GENERAL JURISDICTION DIVISION, ACCRA ON THE 29TH DAY OF OCTOBER, 2024.

[Handwritten signature]
CERTIFIED TRUE COPY
REGISTRAR
HIGH COURT
GENERAL JURISDICTION, LEG. ACCRA
ee

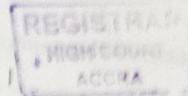
(SGD)
PATRICK BONI
(AG. REGISTRAR)



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

WRIT ISSUED FROM

Accra 24th



20.24

SUIT NO.

51099/2024

IN THE SUPERIOR COURT OF JUDICATURE
IN THE HIGH COURT OF JUSTICE
GENERAL JURISDICTION DIVISION
ACCRA - A.D. 2024

BETWEEN

SOLOMON DAVID ABOAGYE

PEACE FM ABEKA JUNCTION
ACCRA

-VRS-

PLAINTIFF

1. **VALENTINA NANA AGYEIWAA**, ALIAS AFIA SCHWARZENEGGER
COMMUNITY 18, TEMA. (INSTAGRAM: QUEENAFIASCHWARZENEGGER/
TIKTOK: @QUEENSCHWAR/EMAIL: OWONTAA@GMAIL.COM)

DEFENDANTS

2. **CHARLES NII ARMAH MENSAH JR.**, ALIAS SHATTA WALE
H/NO J211 BENJAMIN SOWAH AVENUE, ADJRINGANOR, ACCRA,
GD-239-B108 (INSTAGRAM: SHATTAWALEGH/SHATTAWALENIMA2)
SNAPCHAT @ SHATTAWALENIMA2

(ALSO BY ELECTRONIC SERVICE INCLUDING BY WHATSAPP)

(Plaintiff will direct service)

To

AN ACTION having been commenced against you by the issue of this Writ by the above-named
plaintiff **SOLOMON DAVID ABOAGYE**

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.
VALENTINA NANA AGYEIWAA & CHARLES NII ARMAH MENSAH JR.

AND TAKE NOTICE that in default of your so doing, judgment may be given in your absence without
your notice to you. **VALENTINA NANA AGYEIWAA & CHARLES NII ARMAH MENSAH JR.**

Dated this

24th day of

July

20.24

Chief Justice of Ghana

G. SACKY TURKSON (MRS.)

(B) 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).

FORM I

STATEMENT OF CLAIM

WHEREFORE Plaintiff claims against Defendants jointly and severally the following reliefs:

- (i) A declaration that the complained comments by 1st Defendant are defamatory of Plaintiff, and same have gravely injured Plaintiff's hard-earned reputation and family.
- (ii) A declaration that 2nd Defendant made defamatory comments, aided, encouraged, or participated in the broadcast/publication of the complained comments against Plaintiff, and same have gravely injured Plaintiff's hard-earned reputation and family.
- (iii) A declaration that the republication and further circulation on/by other media platforms of the complained comments against Plaintiff, have gravely injured Plaintiff's reputation and family.
- (iv) An order for an unconditional retraction and an unqualified apology for said defamatory comments/publications, doing so separately and in the Daily Graphic newspaper and on all social media handles of Defendants including on YouTube, and for same to be given equal prominence as the complained comments/broadcasts/publications within 14 days from the day of judgment.
- (v) An order that the contents of relief (iv) above be subject to the prior approval of Plaintiff, and for Defendants to personally and separately read out same on all outlets named in (iv) above.
- (vi) An order of perpetual injunction restraining Defendants whether by themselves, their agents, assigns or servants from any further comments of said complained defamation.
- (vii) General damages for defamation.
- (viii) Compensatory and Exemplary damages of GHC 8,000,000.00 for injury to character, integrity and reputation against Defendants.
- (ix) Costs, including legal fees and cost of the suit.
- (x) Further or other reliefs as the Court may deem fit.

This Writ was issued by A-PARTNERS @ LAW

Whose address for service is PLOT NO. D36 DANSOMAN HOUSING ESTATE, ADOTEY MINGLE ST., GHANAPOST GPS GA-565-0851, OPP. NEW CENTURY CAREER TRAINING INSTITUTE, BY DANSOMAN CLUSTER OF SCHOOLS, SAIARA-DANSOMAN, ACCRA.



Agent for

Lawyer for the plaintiffs

SAMSON LARDY ANYENINI, ESQ.
SOL. LIC. NO. eGAR 01733/24
SOL. TIN: P0003195791
CH. REG. NO.: eP00168/24
FIRM TIN: C0003203867
FIRM BP 3000025470
A-PARTNERS@LAW
SOLICITORS FOR PLAINTIFF

Who resides at ACCRA

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 plaintiff's claim is for liquidated 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 DIVISION
ACCRA-A.D. 2024

SOLOMON DAVID ABOAGYE
PEACE FM ABEKA JUNCTION
ACCRA

Filed on 24/5/24
at 10:00 am pm
Hansen Register
Hansen
ACCRA

SUIT NO.

PLAINTIFF

-VRS -

VALENTINA NANA AGYEIWAH ALIAS AFIA SCHWARZENEGGER
COMMUNITY 18, TEMA. (INSTAGRAM: QUEENAFIASCHWARZENEGGER/
TIKTOK: @QUEENSCHWAR/EMAIL: OWONTAA@GMAIL.COM)

CHARLES NII ARMAH MENSAH JR. ALIAS SHATTA WALE
H/NO J211 BENJAMIN SOWAH AVENUE, ADJIRINGANOR, ACCRA.
GD-233-9105 (INSTAGRAM: SHATTAWALEGH/SHATTAWALENIMA/
SNAPCHAT @ SHATTAWALENIMA2)

(ALSO BY ELECTRONIC SERVICE INCLUDING BY WHATSAPP)

DEFENDANTS

STATEMENT OF CLAIM

1. Plaintiff is an award-winning Broadcast Journalist and host of a very popular entertainment show on Peace 104.3 FM of the Despite Group of Companies.
2. Plaintiff is well known as Kwasi Aboagye in the entertainment industry in Ghana wherein he enjoys considerable respect by virtue of his engagements therein for well over twenty-five years.
3. 1st Defendant, popularly known as AFIA SCHWAR, also works in the entertainment industry as actress and show host on radio and television in Accra, and is regularly running verbally abusive commentary on social media with an unquantifiable number of people and bloggers consuming and spreading same.
4. 2nd Defendant is a famous musician with considerable following in Ghana and beyond.
5. Defendants have been known to live and/or ordinarily carry on business within the jurisdiction of this Honourable Court, and the complained publications/publications also available to and consumed by numerous people ordinarily within the jurisdiction of this Honourable Court.
6. Plaintiff avers that Defendants, without provocation, acting together with a common purpose to defame, on or about the 6th of May 2024, went live on TikTok, a social media app, and made defamatory statements about him.

7. Plaintiff avers that in said TikTok video or publication, 1st Defendant falsely accuses Plaintiff of the criminal conduct of defiling minors and makes imputations of impotency and infidelity.

8. Plaintiff avers, further to the preceding paragraph, that 2nd Defendant is heard in said defamatory publication encouraging, repeating, explaining, deriding and adding on to the defamatory comments of 1st Defendant.

9. Plaintiff avers that said defamatory publication was circulated to, republished by many including bloggers on various social media platforms including YouTube, and attracting numerous similar adverse and reproachful comments by an unquantifiable number of people.

10. Plaintiff avers that the particulars of four of the complained publication/republications, mostly in the Asante-Twi language, are in the following titles or headlines:

- i. Afia Schwar Bl@st MzGee, Ola Michael, Kwasi Aboagye & Andy Dosty Over Medikal Interview on UTV + Shatta;
- ii. Kwesi Aboagye is Very Small – Afia Schwarzenegger
- iii. Asem Asi...Afia Schwar reacts to lawsuit over claims of impotence, d3filem3nt by Kwesi Aboagye
- iv. You Slept With Me When I Was A Minor - Afia Schwar Fire Back At Kwasi Aboagye

11. Plaintiff avers that the complained publications/republications shall be tendered at trial and that each lasts a duration of 15 minutes/35 seconds, 3 minutes/32 seconds, 11 minutes/47 seconds and 14 minutes/1 second.

12. Plaintiff avers that in the complained publication/republication in subparagraph (i) of paragraph 10 above, 1st Defendant alleges in the essential parts which translates as follows:

"Akwasu Aboagye, I was in a relationship with him 23 years ago. I am 42 years. I was 19 years old. He took me to Rexmar Hotel in Kumasi and wasted my time. He could not penetrate me. He could not make love to me even though I offered myself to him. He is incapable of an erection without taking in pills or Viagra. I know his manhood is very small. How could such an impotent man father twins. Is that not a marvel?"

13. Plaintiff avers that in the complained publication/republication in subparagraph (ii) of paragraph 10 above, 1st and 2nd Defendants are in conversation, the essential parts of which comments are as follows:

1st Defendant: "Do not worry when he talks about you because his manhood is very small"

2nd Defendant: "Ah. You are tell me."

1st Defendant: "Oh. I was 19 years old when I saw it. So now that I am 42 years, it should be like a pin."

2nd Defendant: "Hahaha. Ah! Ei."

1st Defendant: "Yes, he could not penetrate me. I was barely 19 years old. So I say he is a defiler."

2nd Defendant: "How I wish a girl below 18 years would come out to expose him."

1st Defendant: "They are afraid. But truth when he had an affair with me I was 19 years old. His manhood was small. We fought. I gave him a scandal because as for me you cannot take me into the room without penetrating me. I gave it to him but he could not chop it."

2nd Defendant: "Ah! That is why he jealous of me. He will compose a song about his manhood like a pimple."

14. Plaintiff avers that the complained publications/republications remain on numerous social media platforms including as found on pages known and referred to as Daily Watch TV, Yes Ghana Online, ADEPA TV, 360 GHNEWS, Daily View GH.

15. Plaintiff avers that the defamatory comments were and are understood to refer to him, meant and mean Plaintiff is immoral, irresponsible, impotent, unfaithful to his partner with whom he has children, and that said partner must also be unfaithful to Plaintiff because he is incapable of impregnating her to be father of their children, and that Plaintiff is in the habit of committing the crime of defilement and consequently a danger to society.

16. Plaintiff shall contend that the complained publications/republications were calculated, with malice, to, and have gravely injured his reputation in the eyes of right-thinking members of society.

17. Plaintiff avers that on 16th May 2024, he caused his lawyers to write to demand a retraction and apology for the defamatory statements but 1st Defendant would, without hesitation, rather make further defamatory publications, and daring Plaintiff to meet her in a "stupid court".

18. Plaintiff avers that soon after 1st Defendant's conduct in paragraph 17 above, her lawyers delivered a reply to said demand notice by letter dated 20th May 2024 confirming 1st Defendant's said election.

19. Plaintiff shall contend, at trial, that the complained defamatory comments were actuated by malice aforethought and calculated to cause maximum damage to his hard-earned reputation, and were broadcast or circulated to a large mass of unquantified number of viewers and listeners worldwide to achieve said malicious mission as:

- a) the complained defamatory statements meant and were/are naturally and ordinarily understood by right thinking members of society to mean Plaintiff was promiscuous, immoral, a criminally-minded person who was engaged or involved in the criminal offence of defiling minors.
- b) the complained defamatory statements meant and were/are naturally and ordinarily understood by right thinking members of society to mean Plaintiff was impotent, less of a man and unable to engage in sexual activities and have children of his own.
- c) the complained defamatory statements meant and were/are naturally and ordinarily understood by right thinking members of society to mean Plaintiff's partner was unfaithful and had children outside their relationship.
- d) the complained defamatory statements meant and were/are naturally and ordinarily understood by right thinking members of society to mean Plaintiff's relationship is a sham and that his children are the product of unfaithful sexual affairs.

20. Plaintiff will rely on the following facts and matters in support of a claim for damages, including aggravated and punitive damages for defamation and malicious defamation:

- (i) The defamatory comments which were broadcast/publicized variously were made by Defendants recklessly.

- (ii) The defamatory comments which were broadcast/publicized variously were made by Defendants knowing full well that they were false, inaccurate and untrue.
- (iii) The defamatory comments which were broadcast/publicized variously subsequently even upon caution were made by 1st Defendant maliciously in a manner calculated to cause maximum damage and hurt to Plaintiff's reputation and family.
- (iv) The defamatory comments which were broadcast/publicized variously originally and subsequently even upon/despite caution, were actuated by malice aforethought and intended to cause maximum damage and hurt to Plaintiff's reputation and family.
- (v) Defendants have caused grave damage to Plaintiff's reputation, as right-thinking people have, in spite of Plaintiff's denial, continued to rely on same comments to ridicule and pour scorn on Plaintiff among others, holding Plaintiff as a criminal/criminally-minded, immoral and promiscuous, a sexual predator among the meanings in paragraphs 15 and 19 above.
- (vi) That while Plaintiff regrets a brief encounter with 1st Defendant once while they were both unmarried over 20 years ago (as variously proclaimed and admitted by 1st Defendant), Plaintiff denies all her allegations and imputations of crime as *completely false* and malicious.

21. Plaintiff shall rely on the above, audiovisual recordings, print and such ocular evidence of the matters aforesaid and associated certified transcriptions and translations to contend that he is deserving of reliefs including damages for the tort committed against him by Defendants.

WHEREFORE Plaintiff claims against Defendants jointly and severally the following reliefs endorsed on his Writ of Summons:

- (i) A declaration that the complained comments by 1st Defendant are defamatory of Plaintiff, and same have gravely injured Plaintiff's hard-earned reputation and family.
- (ii) A declaration that 2nd Defendant made defamatory comments, aided, encouraged, or participated in the broadcast/publication of the complained comments against Plaintiff, and same have gravely injured Plaintiff's hard-earned reputation and family.

- (iii) A declaration that the republication and further circulation on/by other media platforms of the complained comments against Plaintiff, have gravely injured Plaintiff's reputation and family.
- (iv) An order for an unconditional retraction and an unqualified apology for said defamatory comments/publications, doing so separately and in the Daily Graphic newspaper and on all social media handles of Defendants including on YouTube, and for same to be given equal prominence as the complained comments/broadcasts/publications within 14 days from the day of judgment.
- (v) An order that the contents of relief (iv) above be subject to the prior approval of Plaintiff, and for Defendants to personally and separately read out same on all outlets named in (iv) above.
- (vi) An order of perpetual injunction restraining Defendants whether by themselves, their agents, assigns or servants from any further comments of said complained defamation.
- (vii) General damages for defamation.
- (viii) Compensatory and Exemplary damages of GHC 8,000,000.00 for injury to character, integrity and reputation against Defendants.
- (ix) Costs, including legal fees and cost of the suit.
- (x) Further or other reliefs as the Court may deem fit.

DATED AT A-PARTNERS @ LAW, ANYENINI CHAMBERS, PLOT NO. D36 DANSOMAN HOUSING ESTATE, ADOTEY MINGLE ST., GHANA POST GPS GA-565-0851, OPP. NEW CENTURY CAREER TRAINING INSTITUTE, BY DANSOMAN "A" CLUSTER OF SCHOOLS, SAHARA – DANSOMAN, ACCRA, THIS 24TH DAY OF JUNE, 2024.



THE REGISTRAR
HIGH COURT OF JUSTICE
ACCRA

SAMSON LARDY ANYENINI, ESQ.

SOL. LIC.: NO. EGAR 01733/24

SOL. TIN: P0003195791

CH. REG. NO.: ePP00168/24

FIRM TIN: C0003203867

FIRM BR: 30000025470

A-PARTNERS @ LAW
SOLICITORS FOR PLAINTIFF

AND FOR SERVICE ON:
DEFENDANTS, AND ALSO BY ELECTRONIC SERVICE INCLUDING BY WHATSAPP