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Registrar

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

=====

IN THE MATTER OF CASE No. CR 904/17 INTITULED REPUBLIC v
EUGENE BAFFOE BONNIE AND FOUR OTHERS.

AND

IN THE MATTER OF AN APPLICATION BY KEVIN TAYLOR FOR AN
ORDER OF CERTIORARI TO BRING UP INTO THIS COURT TO
BE QUASHED AND FOR PURPOSES OF QUASHING THE WARRANT OF
ARREST ISSUED BY THE HIGH COURT [COMMERCIAL DIVISION -7],
ACCRA DATED THE 16TH OF JANUARY 2020 FOR THE ARREST OF THE
APPLICANT (KEVIN EKOW TAYLOR).

AND

IN THE MATTER OF:

THE REPUBLIC

v.

HIGH COURT (COMMERCIAL DIVISION) ... RESPONDENT.

EX PARTE KEVIN EKOW TAYLOR. ... APPLICANT.

ATTORNEY-GENERAL INTERESTED PARTY. ... INTERESTED PARTY.

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MOTION ON NOTICE TO INVOKE THE SUPERVISORY JURISDICTION OF
THE SUPREME COURT PURSUANT TO ARTICLE 132 OF THE
CONSTITUTION, 1992 AND RULE 61(1) OF THE SUPREME COURT
RULES, 1996 (C.I. 16).

=====

PLEASE TAKE NOTICE that pursuant to the provisions of article 132 of the
1992 Constitution of the Republic of Ghana, this Court will be moved on

the 22nd day JULY, 2025 at 9am

of 2025 at 9 o'clock in the forenoon or so soon thereafter as Counsel for
and on behalf of the Applicant may be heard on an application for an order of
certiorari directed at the High Court, Commercial Division, to bring up into
this Court for purposes of being quashed and the quashing of the warrant of
arrest issued by His Lordship Eric Kyei Baffour JA (Sitting as an additional
Justice of the High Court) dated the 16th day of January, 2020 in the case
intituled the *Republic v Eugene Baffoe-Bonnie & Four Others* (Case No.
CR/904/17) for the arrest of the Applicant and for a declaration that the High
Court has no jurisdiction to issue a warrant for the arrest of the Applicant
without first giving the Applicant an opportunity to answer any charges
against him

Upon the grounds set out below and upon the facts deposed to in the accompanying affidavit.

GROUND OF APPLICATION

- a. The High Court acted in breach of the rule of natural Justice *audi alteram partem* when it issued the warrant for the "apprehension of the body of" the Applicant without first hearing the Applicant on the allegations based on which the High Court issued the said warrant of arrest.
- b. The High Court's warrant for the "apprehension of the body of" the Applicant was not made in accordance with any procedure sanctioned by law.
- c. The High Court committed an error of law when by its order directed the Applicant's be first apprehended before being heard when there was no previous order for the Applicant to appear before the High Court to show cause which the Applicant did not comply with.

And for such further or other order(s) as this Honourable Court may deem fit.

COURT TO BE MOVED on the ... day of ... 2025 at 9:00 O' clock in the forenoon or so soon thereafter as Counsel for the 1st Defendant may be heard.

DATED AT ACCRA THIS 2ND DAY OF JULY 2025.



PETER OKUDZETO ESQ.
COUNSEL FOR APPLICANT.
SOLICITOR'S LICENSE NO. eGAR00298/25.
CHAMBER NO: ePP09183/24.
TIN- P0016476050.

AND FOR SERVICE:

1. THE ATTORNEY-GENERAL,
ATTORNEY-GENERAL'S DEPARTMENT,
MINISTRIES, ACCRA.
2. THE INSPECTOR GENERAL OF POLICE,
POLICE HEADQUARTERS,
ACCRA.
3. NATIONAL SECURITY CO-ORDINATOR,
NATIONAL COUNCIL SECURITY SECRETARIAT,
ACCRA.

**IN THE SUPERIOR COURT OF JUDICATURE,
IN THE SUPREME COURT OF GHANA,
ACCRA - A. D. 2025.**

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**IN THE MATTER OF CASE No. CR 904/17 INTITULED REPUBLIC v
EUGENE BAFFOE BONNIE AND FOUR OTHERS.**

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**IN THE MATTER OF AN APPLICATION BY KEVIN TAYLOR FOR AN
ORDER OF CERTIORARI TO BRING UP INTO THIS COURT TO
BE QUASHED AND FOR PURPOSES OF QUASHING THE WARRANT OF
ARREST ISSUED BY THE HIGH COURT [COMMERCIAL DIVISION -7],
ACCRA DATED THE 16TH OF JANUARY 2020 FOR THE ARREST OF THE
APPLICANT (KEVIN EKOW TAYLOR).**

AND

**IN THE MATTER OF:
THE REPUBLIC**

v.

**HIGH COURT (COMMERCIAL DIVISION).
RESPONDENT.**

...

EX PARTE KEVIN EKOW TAYLOR.

...

APPLICANT.

ATTORNEY-GENERAL INTERESTED PARTY. ... INTERESTED PARTY.

=====

**AFFIDAVIT OF KEVIN EKOW TAYLOR [THE APPLICANT] IN SUPPORT
OF MOTION FOR CERTIORARI AND DECLARATION IN RESPECT OF
WARRANT OF ARREST DATED 16TH JANUARY 2020.**

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I, KEVIN EKOW TAYLOR, of the United States of America, do hereby make
oath and say that:

1. I am the deponent herein and the Applicant in the above intituled application.
2. I therefore depose to this affidavit for and on my own behalf in support of the application before the Court.
3. The facts I depose to in this affidavit, unless otherwise deposed to are within my personal knowledge, information and honest belief.
4. I acquired knowledge of the facts I depose to in my present affidavit based on media information and also a copy of the order the subject of my instant application made available to me by my lawyers.

5. In the event that any statement I depose to in this affidavit state matters of law, such deposition is based on my lawyer's advice to me which advice I verily believe.
6. My counsel shall, if necessary, at the hearing of my application seek leave of the court to refer to any processes filed in relation to the matters which are relevant to my application.
7. For quite sometime friends and relatives in Ghana have informed me that the High Court of the Republic of Ghana has issued a warrant for my arrest but none of such relatives and friends have ever made available to me a copy of the High Court's order despite several requests.
8. Indeed, friends and relatives in Ghana have drawn my attention to several social media discussions of the said warrant for my arrest but none was able to provide a copy to me for my attention.
9. Because I do not ordinarily reside in Ghana, I have not paid attention to it especially that no one ever showed me a copy of the order even though I always asked for copies each time a friend or relative mentions it to me in a conversation or when I hear social media discussions on it.
10. Given the frequency of the reference to the order and the discussions I have heard about it on social media, I engaged the services of my present solicitor sometime in April this year 2025 who after about a month (that is sometime at the end of May) of search, sent me a copy of the order which is exhibited hereto and marked A.
11. My lawyer explained the difficulty in obtaining a copy of the court order because although I instructed him to find the order if any, I did not know which court issued it.
12. The order says that it is issued for the arrest of a certain **Kelvin Taylor** which is not my name but given its close resemblance with my name and the information I have received from my friends and relatives in Ghana, the order is believed to refer to me because all media discussions I have heard on the subject all point to me as the subject of the order.
13. The order refers to a "scandalous video circulating on social media... which video contains an extremely scandalous and prima facie contemptuous speak that scandalises the Judge, the Court and the whole administration of justice."
14. The order however did not direct that I be served with a copy of the said video to enable me to appear before the Court to explain whether

the video was generated by artificial intelligence or doctored or even my thinking based on which the video was made before directing that I be arrested.

15. My lawyer has also confirmed that the registry of the High Court did not have a copy of the video to enable him to advise me on the video.
16. In any event, the order for my arrest was made in breach of my right to be heard before any order is made against me and also contrary to law because the order for my arrest was made without first giving me a hearing.
17. In terms of of paragraph 14 of my affidavit I say that the order of the High Court clearly undermines the High Court's own obligation to protect my fundamental human right to liberty because I have not on invitation of the High Court refused to appear before the court to answer the court's charges of contempt against me for which reason there is no legal basis for the warrant for my arrest before my appearance in court to answer to the contempt charge.
18. In all instances in which the courts are minded to summon persons to appear before them to show cause why they should not be convicted for contempt, appearing before the court to answer the contempt charges is not preceded by an order for the arrest of the suspected contemnor who has not indicated their intention to refuse to show up in court voluntarily to answer the charge.
19. The warrant for my arrest therefore even before I am given a hearing constitutes a real threat to my fundamental human rights and must not be executed unless I am given the opportunity to voluntarily appear before the court to answer the contempt charge.
20. The High Court's power to make orders to deprive any person of their liberty must be made in accordance with law but no law sanctions depriving me of my liberty before hearing me out.
21. WHEREFORE I depose to my present affidavit in good faith.

.....
DEPONENT.

SWORN AT ACCRA
THIS 21st DAY OF
JULY 2025.

BEFORE ME,



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

=====

IN THE MATTER OF CASE No. CR 904/17 INTITULED REPUBLIC v EUGENE
BAFFOE BONNIE AND FOUR OTHERS.

AND

IN THE MATTER OF AN APPLICATION BY KEVIN TAYLOR FOR AN ORDER OF
CERTIORARI TO BRING UP INTO THIS COURT TO BE QUASHED AND FOR
PURPOSES OF QUASHING THE WARRANT OF ARREST ISSUED BY THE HIGH
COURT [COMMERCIAL DIVISION -7], ACCRA DATED THE 16TH OF JANUARY 2020
FOR THE ARREST OF THE APPLICANT (KEVIN EKOW TAYLOR).

AND

IN THE MATTER OF:

THE REPUBLIC

v.

HIGH COURT (COMMERCIAL DIVISION)

... RESPONDENT.

EX PARTE KEVIN EKOW TAYLOR.

... APPLICANT.

ATTORNEY-GENERAL INTERESTED PARTY.

... INTERESTED
PARTY.

CERTIFICATE OF IDENTIFICATION OF EXHIBIT.

This is to certify that the document exhibited to the affidavit in support
deposed to by KEVIN EKOW TAYLOR hereto and marked **A** is the document
mentioned in the affidavit, the details of which documents are as follows:

1. A copy of an order exhibited and marked **A**.

BEFORE ME,


COMMISSIONER FOR OATHS.


EXH A

IN THE SUPERIOR COURT OF JUDICATURE
IN THE HIGH COURT OF JUSTICE
(COMMERCIAL DIVISION)
ACCRA-GHANA

CASE NO. CR 904/17

THE REPUBLIC

VERSUS

1. EUGENE BAFFOE-BONNIE
2. WILLIAM MATTHEW TETTEH TEVIE
3. NANA OWUSU-ENSAW
4. ALHAJI SALIFU MIMINA OSMAN
5. GEORGE DEREK OPPONG



SGD.

ERIC KYEI BAFFOUR (JA)
JUSTICE OF THE COURT OF APPEAL
SITTING AS ADDITIONAL
HIGH COURT JUDGE

WARRANT FOR THE ARREST OF KELVIN TAYLOR

WHEREAS the above-named case is pending before the High Court, Accra.

AND WHEREAS, the Court's attention has been drawn to a scandalous video circulating on social media in relation to this case, which video contains an extremely scandalous and prima facie contemptuous speech that scandalizes the Judge, the Court and the whole administration of justice.

AND WHEREAS, the said scandalous video is purported to have been made by a scoundrel who styles himself as **Kelvin Taylor**, who is not a party to this case.

AND THE COURT, finding it necessary to invoke the powers vested in it under Article 126(2) of the Constitution, 1992, to proceed against the said scoundrel, **Kelvin Taylor** for contempt.

CERTIFIED TRUE COPY
[Signature] PP REGISTRAR
HIGH COURT
COMMERCIAL DIVISION ACCRA

S.M.

HIS IS THE INSTRUMENT MARKED
AS EXHIBIT..... REFERRED
TO IN THE AFFIDAVIT.....
SWORN BEFORE ME THIS.....
DAY OF.....
COMMISSIONER FOR OATH

NOW THEREFORE, the Court orders the issuance of this Warrant for the **apprehension** of the body of **Kelvin Taylor**, and for him to be produced before the court, to answer to the question why he should not be committed to prison for making such contemptuous statements which are totally a fabrication by him, in the said video.

IT IS HEREBY FURTHER ORDERED, that this Warrant is directed at the **Inspector-General Police (IGP)** and the **Ghana Police Service**, the **Bureau of National Investigations (BNI)** and the **National Security**, to take appropriate steps for the apprehension and production of the said **Kelvin Taylor** before the court.

IT IS FURTHER ORDERED, that this Warrant remains in force until the said **Kelvin Taylor** is arrested, and shall lapse the day the said **Kelvin Taylor** expires from the surface of the earth.

**GIVEN UNDER MY HAND AND SEAL OF THE HIGH COURT OF JUSTICE (COMMERCIAL DIVISION),
ACCRA THIS 16TH DAY OF JANUARY, 2020**

**SGD.
STEPHEN AFOTEY
(REGISTRAR)**

ENTERED THIS 16TH DAY OF JANUARY 2020
[Signature]
REGISTRAR
HIGH COURT
COMMERCIAL DIVISION ACCRA

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

=====

IN THE MATTER OF CASE No. CR 904/17 INTITUTED REPUBLIC v
EUGENE BAFFOE BONNIE AND FOUR OTHERS.

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IN THE MATTER OF AN APPLICATION BY KEVIN TAYLOR FOR AN
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ARREST ISSUED BY THE HIGH COURT [COMMERCIAL DIVISION -7],
ACCRA DATED THE 16TH OF JANUARY 2020 FOR THE ARREST OF THE
APPLICANT (KEVIN EKOW TAYLOR).

AND

IN THE MATTER OF:

THE REPUBLIC

v.

HIGH COURT (COMMERCIAL DIVISION). ... RESPONDENT.

EX PARTE KEVIN EKOW TAYLOR. ... APPLICANT.

ATTORNEY-GENERAL INTERESTED PARTY. ... INTERESTED PARTY.

=====

STATEMENT OF CASE IN SUPPORT OF MOTION FOR CERTIORARI AND
DECLARATION IN RESPECT OF WARRANT OF ARREST OF KEVIN
EKOW TAYLOR [THE APPLICANT] DATED 16TH JANUARY 2020.

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Introduction.

The Applicant invokes the supervisory jurisdiction of the Court pursuant to the provisions of article 132 of the 1992 Constitution of the Republic of Ghana, for an order of certiorari directed at the High Court, Commercial Division, to bring up into this Court for purposes of being quashed and the quashing of the warrant of arrest issued by His Lordship Eric Kyei Baffour JA (Sitting as an additional Justice of the High Court) dated the 16th day of January, 2020 in the case intituled the *Republic v Eugene Baffoe-Bonnie & Four Others* (Case No. CR/904/17) for the arrest of the Applicant.

The Applicant also prays the Court to declare that the High Court has no jurisdiction to issue a warrant for the arrest of the Applicant without first giving the Applicant an opportunity to answer any charges against him

The grounds for which a person can invoke the Supervisory Jurisdiction of the

In the case of *Republic vs High Court, Kumasi; Ex Parte Appiah And Others* [1997-98] 1 GLR 503 at page 591, the Court held that power is given to the Supreme Court to exercise supervisory jurisdiction over all courts (including the High Court) and any adjudicating authority and may in the exercise of such jurisdiction issue orders and directions for the purpose of enforcing or securing the enforcement of its supervisory power-vide article 132 of the Constitution, 1992.

The Court further held that based on its supervisory jurisdiction, if it is found that the High Court in exercising its jurisdiction has breached any of the rules of natural justice or on the face of its orders erred in law, or has acted in excess of its jurisdiction or lacks jurisdiction in the matter it has acted on, this court would have power to order the removal of those proceedings before it for the purpose of having those proceedings quashed.

In the case under discussion, the Court also held that an application of the kind before the Court must be considered from a very broad perspective and that being a discretionary power, it must be shown that there is a real justification for its grant.

It is submitted that the application before the Court satisfies the criteria set out by the Court in the case cited above.

Timing of the Application.

The Court will very easily observe that the application has been made outside the statutory period specified by Rule 62 of the Supreme Court Rules, 1996, C. I. 16, as amended which says that any application to invoke the supervisory jurisdiction of the Supreme Court ought to be filed within 90 days. It provides thus:

“An application to invoke the supervisory jurisdiction of the Court shall be filed within 90 days of the date when the grounds for the application first arose unless the time is extended by the Court”.

The Court has however explained that the time from which to reckon the 90 days is not the date of the order but the time when the Applicant became aware of the order. It was therefore held in the case of *Republic v High Court (Fast Track Division) Accra; Ex Parte State Housing Co Ltd (No 2) (Koranten-Amoako)* [2009] SCGLR 185 per Georgina Wood CJ page 192 as follows:

“Under the amended rule, the statutory period of ninety days was determinable by reference to the “date when the grounds for the application first arose” and not the “date of the decision against which the jurisdiction is invoked” as existed under the old rule

62. a plain reading of the amended rule presupposes that the legislature envisages a situation where the grounds could even arise a second or some other subsequent time, but clearly, the time limit beings to run from the "date when the grounds for the application first arose."

See also the cases of *Republic v High Court, Accra Ex parte Addae-Atchewerebuo III & Others (Asare Baah III & Others Interested Parties) (Attorney-General & Electoral Commission-Third Parties)* [2010] SCGLR 359, *Republic v. High Court, Kumasi; Ex parte Mobil Oil (Ghana) Ltd (Hagan Interested Party)* [2005-2006] SCGLR 312, *Republic v High Court, Accra, Ex parte Charge D'affaires (Land Title Registry & Others-Interested Parties)* Civil Motion No.J5/34/2015 dated 24th February 2016.

In this case, the Applicant has deposed that he was not aware of the order until his lawyer procured it sometime in May of this year. The month of May this year is therefore the valid period from which to reckon the timing of the present application. In any event, it is submitted that the Court has also held that where the order which is the subject of the application is a nullity then the time limits provided for in the rules do not apply. See the cases of *Republic v High Court (Fast Track Division) Accra Ex parte Speedline Stevedoring Co Ltd (Dolphyne Interested Party)* [2007-2008] 1 SCGLR 102, *Republic v High Court, Accra, Ex parte Nii Nueh Odonkor*. Unreported Ruling in Civil Motion No J5/26/2014 dated the 10th day of July 2014, *Republic v 1. The High Court, Accra 2. Nana Yaa Konadu Ex parte Alhaji Abdul Rashid*, CM J5/13/2014 dated 13/2/2014,

The Applicant's case in this instance is that since the order was made against him in breach of the rules of natural justice the order is timelessly a nullity as held by the Court in the plethora of cases.

Grounds of the application.

As submitted in the introduction to the statement of case, the grounds for which a person can invoke the Supervisory Jurisdiction of the Supreme Court are breach of the rules of natural justice, error on the face of the record, and excess of jurisdiction or lack of jurisdiction. See *Republic v High Court, Cape Coast, Ex parte Sey (University of Education, Winneba-Interested Party)* [2019-2020] 2 SCLRG 575 [Adaare] at page 591 and *Republic vs High Court, Kumasi; Ex Parte Appiah And Others* [1997-98] 1 GLR 503, *Republic v High Court (Commercial Division) Ex parte Environ Solutions & Others (Dannex Limited & Others-Interested Parties)* [2019-2020] 1 SCLRG 1 [Adaare] at page 37, *Republic v Court of Appeal, ex-parte Tsatsu Tsikata* [2005-2006] SCGLR 612 at page 619 per Wood JSC (as she then was) *Republic v High Court Accra, Ex-parte Commission on Human rights and Administrative Justice (CHRAJ) (Addo Interested party)* [2003 – 2004] 1 SCGLR 312 at 345 – 346 and *Republic v High Court (Land Division) Accra, Ex-parte Al-Hassan Ltd. (Thaddeus Sory,*

Interested Party) [2011] 1 SCGLR 478 at 487 and *Republic v High Court, Commercial Division, Accra; Ex-parte The Trust Bank Limited (Ampomah Photo Lab Ltd and Three Others – Interested Parties)* [2009] SCGLR 164 at 170 –

Breach of the rules of natural justice.

In the affidavit in support of the application, the Applicant makes it clear that no order was first made for the Applicant to appear before the High Court to show cause why he should not be committed for contempt of court. As a result of the omission to first order that he appear before the High Court to show cause, no order was served on him to appear. The High Court therefore made an order depriving him of his liberty without giving him a hearing. This is the clearest case of a court treating with levity a person's right to be heard.

In terms of the submission just made, the practice is that the Court first issues an order for the person alleged to be in contempt to appear before the Court. The Court does not first direct the arrest of the alleged contemnor before they are given the opportunity to first appear before the court. On the submission just made, reference is made to the decision of the Court in Civil Motion No. J8/108/2016 dated 27th July 2016 in the case entitled *In Re The Owner of the Station-Montie FM and Others, Abu Ramadan and Anor v Electoral Commission and Anor*.

In that case the Court issued a summons for the contemnors to appear before the Court to show cause first before the orders of the Court pertaining to their liberty was made. The law has never been that the alleged contemnor be first deprived of their liberty before they are given a hearing. It is based on the submissions just made that it is contended that the order for the Applicant's arrest was made in breach of the rules of natural justice.

In the case of *In Serbeh-Yiadom v Stanbic Bank (Gh) Ltd* [2003-2005] 1 GLR 86 the Court stated that:-

“It is a salutary and well-known principle of law that a person should be given the opportunity of being heard when he is accused of any wrong doing before any action is taken against him”.

The effect of the failure to hear a person was stated in *The Republic v High Court, Accra Ex-Parte Salloum (Senyo Coker (interested party))* [2011] 1 SCGLR 574 where the Supreme Court stated thus:

“Equally so, if a party is denied the right to be heard as in this case, it should constitute a fundamental error for the proceedings to be declared a nullity. The courts in Ghana and elsewhere seriously frown upon breaches of the audi alteram partem rule to

the extent that no matter the merits of the case, its denial is seen as a basic fundamental error which should nullify proceedings made pursuant to the denial."

The Court had no jurisdiction

The submission on this point will be very brief. It has already been established that the Applicant was not given a hearing before he was heard.

The law is that no tribunal has jurisdiction to make an order affecting the right of a person without giving the person so affected a hearing. To hold otherwise, would be a clear violation of the audi alteram partem rule and the resultant decision will be a nullity. See the cases of *Nana Ampofo Kyei Barfour (suing per his lawful Attorney Nana Antwi Fosuhene I, Asawasehene Asem Kyidomhene of Asem Palace, Kumasi) v Justmoh Construction Co. Ltd & 4 Others*. Civil Appeal No. J4/51/2016, dated the 14th day of June 2017, *Republic v Court of Appeal & Thomford; Ex parte Ghana Chartered Institute of Bankers* [2011] 2 SCGLR 941. *Republic v Judicial Committee of the Gomoa Akyempem Traditional Council, Ex parte Opanyin Pobee (E. R. Kojo Yoyoo-Interested Party.)* Unreported Judgment of the Supreme Court in Civil Appeal, No J4/40/2012, dated the 6th day of February, 2013.

Error of law on the face of the record.

In so far as the liberty of the subject is concerned, the first rule is that everyone is entitled to their liberty. Such liberty is only interfered with in circumstances specified in the provisions of article 14(1) of the 1992 Constitution. In addition to specifying the circumstances under which a person may be deprived of their liberty, article 14(1) of the Constitution also says that depriving a person of their liberty under the circumstances allowed by law **"must be prosecuted in accordance with law."**

The article therefore provides as follows:

"Every person shall be entitled to his personal liberty and no person shall be deprived of his personal liberty except in the following cases and in accordance with **procedure permitted by law...**"

The effect of the highlighted provisions is that even where there is justification to deprive a person of their liberty, the procedure permitted by law must be followed otherwise the interference with the person's liberty is unlawful. This is the effect of the decision of the Court in the case of *Republic v High Court Accra; Ex parte Osafo* [2011] 2 SCGLR 966 the Supreme Court affirmed the provisions of article 14(1) of the 1992 Constitution. The Court held that to commit a person for contempt of court this Court should ensure that the

procedures leading to the committal proceedings have been strictly complied with.

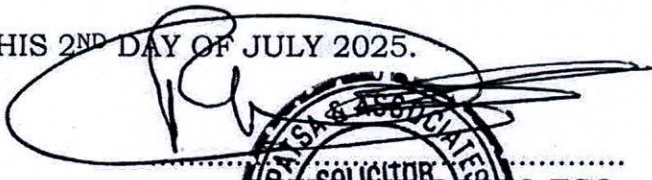
In that case Gbadegbe JSC held as reported in page 970 as follows:

"However, since the matter touched on the right of a citizen to be confined by an order of court and, in particular, the provisions of article 14 of the 1992 Constitution that guarantees the right to personal liberty, we ordered the application to be proceeded with. Reference is made to the constitutional provision contained in article 14(1) (b)..."

As already pointed out the Montie case referred to above, makes it clear that the liberty of a person in matters of the kind that the High Court dealt with is preceded by a summons for the alleged contemnor to appear, but not to arrest him instantly before they show cause.

It is therefore prayed that the Court grant the application.

DATED AT ACCRA THIS 2ND DAY OF JULY 2025.


PETER OKUDZETO ESQ.
COUNSEL FOR APPLICANT.
SOLICITOR'S LICENSE NO. eGAS/298/25.
CHAMBER OF COMMERCE, ACCRA
P.O. BOX 16476050.

AND FOR SERVICE:

1. THE ATTORNEY-GENERAL,
ATTORNEY-GENERAL'S DEPARTMENT,
MINISTRIES, ACCRA.
2. THE INSPECTOR GENERAL OF POLICE,
POLICE HEADQUARTERS, ACCRA.
3. NATIONAL SECURITY CO-ORDINATOR,
NATIONAL COUNCIL SECURITY SECRETARIAT, ACCRA.