REGISTRAR
HIGH COURT
ACCRA

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

WRIT ISSUED FROM ACCRA 2026 SUIT No. GJ/0032/2027

IN THE SUPERIOR COURT OF JUDICATURE
IN THE HIGH COURT OF JUSTICE
GENERAL JURISDICTION DIVISION
ACCRA - A. D. 2026

JOSEPH VAN VICKER — **PLAINTIFF**
3 Boysenberry St.
Batsonaa, Spintex
Accra.

VERSUS

KWADWO NKANSAH — **DEFENDANT**
Aka Lil Win
Mile 7 Achimota Accra.

To **KWADWO NKANSAH**

AN ACTION having been commenced against you by the issue of this writ by the abovenamed 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 12th day of OCTOBER, 2026.

P. BAFFOE-BONNIE
CHIEF JUSTICE

SEALED
Chief Justice of Ghana

HIGH COURT ACCRA

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 Accra 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).*

FORM 1

STATEMENT OF CLAIM

The Plaintiff claims severally and jointly against Defendants is for:

a) A declaration that the words published by Defendant in the said video particulars of which are provided in paragraphs 16 and 17 of the statement of claim are libelous and defamatory.

b) Exemplary damages in the sum of GH¢10,000,000.00 (Ten million Ghana Cedis) for the defamatory publication particulars of which are provided in paragraphs 16 and 17 of the statement of claim.

c) General Damages for libel contained in the Defendant's publication particulars of which are provided in paragraphs 16 and 17 of the statement of claim.

d) A retraction and apology on news portals with the same prominence as the publications for four (4) consecutive weeks

e) Costs, inclusive of legal fees.

This writ was issued by **EBENEZER ASARE ESQ.**

COUNSEL FOR PLAINTIFF

whose address for service is **TROTH LEGAL**
WESTLAND BLVD, RD
WEST LEGON, ACCRA.

Address Number and date of lawyer's current license **NO.: EGAR3320/26**

Lawyer for the plaintiffs same as above 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(2).

IN THE SUPERIOR COURT OF JUDICATURE
IN THE HIGH COURT OF JUSTICE
GENERAL JURISDICTION DIVISION
ACCRA - A. D. 2026

12/10/2026 12:45 am/pm
GENERAL JURISDICTION LCC-ACC

SUIT NO:

JOSEPH VAN VICKER
3 Boysenberry St.
Batsonaa, Spintex
Accra.

PLAINTIFF

VERSUS

KWADWO NKANSAH
Aka Lil Win
Mile 7 Achimota Accra.
(Plaintiff Shall Direct Service)

DEFENDANT

STATEMENT OF CLAIM

1. Plaintiff is an astute and a distinguished Ghanaian pan - African actor, film director and is the chief executive officer of Sky + Orange production, a film production house with international recognition. Plaintiff also holds a degree in Law (LLB) from Wisconsin International University College in 2026.

2. Plaintiff is also a prominent Ghanaian actor Van Vicker, primarily known for his cross-industry dominance across both Ghallywood and Nollywood, he (Plaintiff) has also frequently crossed over into the Kumasi-based Twi film industry (Kumawood), blending English-style romance or drama with popular local comic actors

3. Plaintiff started out his career in the entertainment world as a television personality for TV3 (1997-1999), radio presenter at Groove 106.3 Fm (1999-2000) and Vibe 91.9 Fm (2001-2004) and Metro TV (2000-2006).

4. Plaintiff has appeared in numerous Ghallywood films alongside prominent and notable stars include Majid Michel, Jackie Appiah, Chris Attoh, Nadia Buari, John Dumelo, Yvonne Nelson, Yvonne okoro and Juliet Ibrahim amongst others. Ghallywood is known as the English-language film industry of Ghana, which has produced numerous prominent actors who have achieved massive regional and continental acclaim.

5. Plaintiff has appeared in numerous Nollywood films alongside prominent Nollywood actors, including Genevieve Nnaiji, Mercy Johnson, Stephanie Okereke, Chika Ike and Desmond Elliot amongst others. Some of Plaintiff's popular Nollywood movies include; My Soul Mate, Heart of Fire, Popular King, Gambling with Marriage, Harvest of Love, Stolen Will, The Joy of a Prince, Discovered, The Kingdom and Against the law amongst others.

6. Plaintiff has directed, starred in, and produced major films under his (Plaintiff's) Sky + Orange Productions since 2008. Plaintiff's major foray into producing and

starring in a dedicated Kumawood-collaborative project was in the movie titled Joni Walker sometime in 2014.

7. Plaintiff also stared in the movie titled Broni Wawu in 2015 which is a comedy-drama directed by Frank Garbin featuring Van Vicker alongside Kumawood icons like Kyeiwaa and Kwaku Manu and subsequently landed various roles in other movies titled "Black Monkey" (2016) which is a comedy film pairing Plaintiff with Kwadwo Nkansah (Defendant) and Big Akwess. In "Sika Sei Yonkoo", also a local Kumasi production, Plaintiff featured alongside Defendant, Vivian Jill, and Akrobeto.

8. Plaintiff has been nominated for and won numerous awards from Africa to the Caribbean. Awards include Ghana Movie Awards, ACRAG awards and the Nollywood Academy Films Critics' Awards. In 2009, Plaintiff won the Best African Caribbean Actor and Best Actor African American and in 2011, Plaintiff won the Pan African creative actor. In 2013, Plaintiff won the Best International Actor award at the Papyrus Magazine Screen Actors Awards (PAMSAA) 2013, which was held in Abuja, Nigeria.

9. As a result of Plaintiff's industry, sometime in 2012, Plaintiff's production house, earned him the NAFCA Best Actor and Director Awards for his comedy movie, Joni Waka. Further, by virtue of the positions Plaintiff has occupied, and his role in the development of the movie industry in Ghana, Nigeria and Globally, Plaintiff is well-known both in Ghana and internationally as a man of virtue.

10. Plaintiff has throughout his professional career featured in over one hundred and fifty films worldwide and has built a solid reputation for himself nationwide and also internationally.

11. Plaintiff bridged the gap between Ghana's English-language "Gollywood" sector and the Kumasi-based "Kumawood" industry by bringing mainstream glamour cross-overs to local Twi productions. Plaintiff crossed the traditional divide between Accra glamour films and Kumasi productions by starring in local Kumawood movies like Joni Waka (featuring Agya Koo) and Sika Sei Yonkoo alongside stars like Defendant, Akrobeto, and Vivian Jill among others.

12. Plaintiff has publicly championed the development of the Kumawood as to the Ghanaian film sector, helping validate and raise the national profile of Twi-language cinema during periods when the wider movie industry faced decline in Ghana.

13. Plaintiff has played various mentorship role for young talent in the Kumawood movie industry and has championed the need to set up standards by adopting a structured script practices in an industry historically reliant on scenario-based ad-libbing.

14. Defendant is a Ghanaian artist, musician, actor, comedian and is the founder and director of Great Minds International School in Kumasi, in the Ashanti Region of Ghana. As a result of Defendant's popularity in Ghana, Africa and globally, Defendant has a large number of following on various social media platforms with the result that whatever Defendant says and or publishes spreads like wildfire across the globe.

15. Plaintiff states that on the 13rd day of August 2026, Plaintiff's attention was drawn to a viral video circulating on various social media platforms including Tiktok and

Facebook, which had been published or and caused to be published by Defendant under a screaming headline boldly written in white and yellow ink ***"LIL WIN BANS VAN VICKER FROM ACTING IN KUMASI!"***

16. Defendant published and caused to be published in the said video, which had been authored in the Twi language, and which has been transcribed as such, the following defamatory words about Plaintiff:-

"Yen nuabarima Van Vicker atwa ntoro ato me so. Na saa mmera a megyina ha yi dee pye me nana, me wofase, me ba, makolaa na me no rekasa. Woaye adez atia wo nana mua, for Wizy Empire Production. Mama me mma atumi afre wo, director ne wo adi nkommo about movie a yewo evidence, wo chat, audio biribiara a yede abakyere me. As a producer, me bo amfu, na matu wo fo se w'adaworoma movie no ako fam. Yen mpagya adwuma no enna maka egya agu wo so. Aya se ne ho na chychye no ara ma ode mmirika abeyi ano wo GhanaWeb. GhanaWeb yi nso, meso sen no, mewo din sen no. Kyere se oreko ho akope mmoa se mommoa no na oncounter. Oboa! Woanye adee. PM nie, director nie, woammeye adwuma no. Woadi nkommo. Nea mereka ne se worenye a, Enye bone na mmom ka sæ 'Merennya ho.' Wogye tom nso a, se woaba.

Enye fe. Woreye na woatwa ntoro ato me so se enye nokore. Mebaa wiase, menhuu broni a otwa ntoro da se me ara me nana, Van. Nanso ne nyinaa mu no, mese me nana ne wo, abofra sebe, ogya ne nan gu wo sre so a, yentwa na mmom yepopa.

Atwetann biara ne atwetann na enam. Me ba nono, me nua nono, mepe n'asem. Onya abotre tena ase hunu se dee meyee yi manye adee na otexte me just whatsup keke, Kojo, me nua sorry. Asa! Movie no a yerebetwa no oka ho bi. Na mmom, message amma ankyera se sorry a - Kojo fa kye me. Biribi sei nti na mantumi amma. Biribi sei na mantumi amfa wo call. Five missed calls mansan anreturne back. Mede bekye no. Yaye anuafoo. Na movie kesee a ereba so wo Ghana yi, Hollywood movie no, international movie no a eye Jurney to Africa no, obaka yen ho bi. Kyawpa amma dee a, meka mekyere wo, orentwa movie no bi. Mommisa no se ne fon no so wanhu five missed calls wo so?

(From the background: enye wo ara na wofree no?) Me ara ne mefree no. Anye biara no wonim se wo colleague ne me anaa wo nua kumaa ne me, anaa wo papa ne me. Woahu missed calls, anka ne yie mu no, ewo se wofa. Sebe se biribi na ereto me, se mehia mmoa bi, se meyare, woantumi anreturn the call no back. Almost a week ni. Enye buo. Ne nyinaa merekasa wo nnidie mu, agoro mu, odo mu. Worebetwa ato me so se obiara mfree wo a, eye ntoro. OK, me call emmaa ne fon so? Aden na wanreturn no back. Enye ade pa. Me nua no retwa ntoro. (From the backgroung: Ose owo ho ara na motweree story faa ne ho)

Daabi, enye fe se wode chat no ...

Biribiara wo ha. Wowie a mema director de akyere mo. Audio, nkommo biara wodiie biara wo ho, Whatsup. Biribiara wo so a mewo evidence. Enti me nua Van tumi pa me kyaw se, Kojo, fa kye me. Mfomsoo, asochyee nti. Mede bakye no nne yi ara ama movie no a greba no ako director Frank Fifi Gabby ho. Ono nso ne nua nono. Ope n'asem pa ara. Enye hwee, yanya

adwuma mma Ghana. Industry no nkosoo na yerepe. Na mmom se call amma a ..."

17. The said video, which had been authored in the Twi language, and which was transcribed as such, was also translated into the English language as follows:-

"Our own brother, Van Vicker has lied again against me. As I am standing here now, he is my grandson, my nephew, my son, my own boy that I am addressing. You have offended your own grandfather of all people, dishonored Wizy Empire Production. I instructed my workers to call you - director has had discussion with you about the movie that we have evidence of; your chats, audio. Every evidence is here to prove what I am saying as a producer. In all these, I did not get offended, fraternally, I prompted you that the film shooting is experiencing a nose dive so we should be proactive enough. In the process I started putting intense pressure on you to get things done quickly. I believe that the heat he is experiencing from me has made him to run to Ghana Web to seek public sympathy. I am bigger than that so called Ghana Web. I am popular than the Ghana Web. So, he is running to seek refuge in Ghana Web. That is a lie! He is going to seek people's sentiments in other to counter me. He is lying.

You did not try at all. That is PM and Director. Ask them. You failed to do the work. You have had discussions. All I am saying is that, if you can't do the job, that is not a problem, but openly say that 'I can't'. If you agree to do it, then you must show up. That attitude is bad. You are rather fabricating lies against me.

Since I was born till date, I have never seen a white man that lies so much like my own grandson, Van before. But in all these, as our elders say, that when your child defecates on your lap, you don't cut it off rather you wash it. Know that it is litigant that drags issues with litigants. He is my son, my brother, I like him so much. If he patiently reasons through that his attitude was bad and shows remorse and texts me on WhatsApp saying - Kojo, my brother I am sorry. That's all!

As for the movie, he is part of the cast. But if I do not hear or see any message explaining why he did not answer or return my calls - my five drop calls. If he does that, I will forgive him. We are friends. The new movie we are about to show, that Hollywood movie, international movie - Journey to Africa, he will be part. However, if no remorse is shown, I tell you frankly he will not be part of the cast.

Ask him whether he did not see my calls on his phone. (From the background: isn't you who called him?) I called him personally! If nothing at all, you know me as your colleague, or a younger brother, or I being your father you see my calls. Curtesy demands that you return it. What if I was going through some form of difficulty that I urgently need help, maybe sickness and you do this. Is almost a week now. It doesn't show respect. In the nutshell, I am addressing him honorably, friendly, and with love.

And you lie against me that nobody called you. Okey, he should check his phone to see whether I have not called him severally. Why didn't he return those calls? This is dishonor. My brother is lying. (From the background: He says he just realized you people were making stories about him.)

No! is not advisable to show chats ...

Everything is here. When we are done, I will let director show them to you. Audio, every conversation we have had is here, WhatsApp. I have every evidence. So, if my brother is able to show remorse by saying that, Kojo, forgive me, is an error on my part, I was busy, I will forgive him now. So that our new movie will go to Director Frank Fifi Gabby. He is his brother; he likes him so much. There are no qualms at all. We should work for Ghana. It is the growth of the industry we all seek. But if he fails to call ..."

18. Plaintiff states that the words in the said video particulars of which are contained in paragraphs 16 and 17 (supra), meant and were understood to mean that, Plaintiff in the practice of his profession as an actor, a film producer, and a director is a lair, dishonest and a disrespectful individual who lies about every situation, disrespect, and belittles the Kumawood industry as a whole, together with the industry players including all directors.

19. Plaintiff states that in their natural and ordinary meaning, the words in the video as contained in paragraphs 16 and 17 (supra), meant and were understood to mean that as a result of Plaintiff's deceitful behavior, he accepts rolls in films but fails to show up to perform those roles, and would not respond to calls from producers for accountability.

20. By way of innuendo, the words complained of contained in paragraphs 13 and 14 (supra) meant, and were understood to mean that Plaintiff is a liar, deceitful, pompous, fraudulent and incompetent actor, film producer, and director who has no remorse for his mistakes.

Particulars of Innuendo

a. That Plaintiff has a habit of accepting roles in films but fails to show up to carry out his role as agreed.

b. That Plaintiff is a liar, deceitful, disrespectful, pompous and avoidant individual

c. That Plaintiff is involved in various questionable behaviors.

d. Plaintiff has been banned from taking and or playing any role in the Kumawood movie industry.

21. Plaintiff denies that he has ever engaged in any of the activities being alleged by Defendant, and states that he (Plaintiff) is an upright film producer, and director who abides by the rules governing the film industry and conducts himself professionally at all time.

22. Plaintiff states that by reason of the publication of the said defamatory words, Plaintiff has been seriously injured in his reputation, and has been brought into public scandal, odium, contempt and ridicule as an actor, a film producer, and a director of no moral uprightness, fraudulent, and deceitful.

23. Plaintiff states that since the publication, Plaintiff has been inundated with numerous calls and has had to answer very embarrassing questions and inquiries from different people, including prominent actors, film producers, and directors

globally, and Plaintiff family members in Ghana and abroad who came across the publication.

4. Plaintiff states further that since the publication was made by Defendant, anytime any person undertakes a simple name search on any of the online search platforms including, google, from any part of the world, the said defamatory publications would be shown.

25. Plaintiff contends that Defendant acted maliciously in publishing the said defamatory words which were designed to cause hatred, ridicule and public disaffection, and also to injure Plaintiff's hard-earned reputation. Further, the words complained of were made with malice and characterized by drama and sensationalism, and calculated to whip public hatred against Plaintiff.

Particulars of Malice

Defendant deliberately caused this publication to whip up public sentiments against Plaintiff knowing very well that the facts contained in the publication is false and without any basis.

26. Plaintiff shall rely on the following facts and matters in support of his claim for exemplary damages:-

a. The publication was made in a sensational manner with the intention of causing maximum damage to the reputation of Plaintiff.

b. The publication was made in the sensational manner to attract attention to Defendant thereby increasing his circulation, ratings and viewership on carious social media platforms globally.

c. The publication was made deliberately to draw Plaintiff's name and fame to Defendant's movie project titled "Journey to Africa" for public expectation and anticipation.

d. Defendant knew or ought to have known that the words contained in the publication, the subject matter of this suit, were false.

27. Plaintiff will contend that Defendant published the said publication having knowledge that they were reckless and or with a reckless disregard as to whether or not they were libelous.

28. Plaintiff states that a continued presence of the said publication on the various news platforms and online portals of the Defendant will cause great damage to the Plaintiff's reputation which damage has already commenced.

29. Plaintiff states further that not only did Defendant made the defamatory publication about him, but also, Defendant in the said publication threatened and vowed to barn Plaintiff from either traveling to Kumasi, or practicing his profession an actor, film producer, and director in the Kumawood movie industry.

30. Plaintiff contends that this constitutes a breach of his economic right and right to movement guaranteed under the 1992 Constitution of Ghana. Further as result of this said publication, Plaintiff has lost various roles in the Kumawood movie industry because producers who had previously engage Plaintiff are uncertain about Plaintiff's availability to perform those roles in Kumasi. This is moreso when Defendant who claimed to be acting for the movie association had banned

plaintiff from playing any role in films directed in Kumasi and by the Kumawood film industry players, also from traveling to Kumasi.

Plaintiff states that he (Plaintiff) lives in constant fear and anxiety and had to cancelled all his planned business trips to Kumasi. This is more so when Defendant who has a large following especially in Kumasi has geared up the public against Plaintiff which can result in some attacks on Plaintiff's person.

2. Plaintiff further states that unless restrained by this Honorable Court, Defendant will continue to publish the said words and or similar words complained of.

33. WHEREFORE, Plaintiff claims against the Defendant for:

f) A declaration that the words published by Defendant in the said video particulars of which are provided in paragraphs 16 and 17 of the statement of claim are libelous and defamatory.

g) Exemplary damages in the sum of GH¢10,000,000.00 (Ten million Ghana Cedis) for the defamatory publication particulars of which are provided in paragraphs 16 and 17 of the statement of claim.

h) General Damages for libel contained in the Defendant's publication particulars of which are provided in paragraphs 16 and 17 of the statement of claim.

i) A retraction and apology on news portals with the same prominence as the publications for four (4) consecutive weeks

j) Costs, inclusive of legal fees.

DATED AT TROTH LEGAL, WESTLAND BLVD, RD, WEST LEGON - ACCRA, 10TH DAY OF OCTOBER 2026.

EBENEZER ASARE
Counsel for Plaintiff
Solicitor's License No. eGAR3320/26

The Registrar
High Court
General Jurisdiction
Accra.

And a copy to be served on:

The Above-Named Defendant.