



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

WRIT ISSUED FROM: ~~ACCRA~~ 29/10/2025 SUIT No:

**IN THE SUPERIOR COURT OF JUDICATURE
IN THE HIGH COURT OF JUSTICE
ACCRA-GREATER ACCRA REGION**

**CHARLES KWABENA AMPONSAH
H/NO. AF11, AKROKERRI, ASHANTI REGION
VRS** } **PLAINTIFF**

1. GHANA NATIONAL ASSOCIATION OF
TEACHERS (GNAT)
TEACHERS HALL-GNAT HOSTEL, ACCRA
2. REV. ISAAC OWUSU
PRESIDENT, GNAT
ACCRA.
3. THOMAS MUSAH
GENERAL SECRETARY, GNAT
ACCRA.
4. MAHMUD ISSAH ZAKARY
CHAIRMAN OF ELECTION COMMITTEE
GNAT, ACCRA.

} **DEFENDANTS**

PLAINTIFF SHALL DIRECT SERVICE

To: DEFENDANT

AN ACTION having been commenced against you by the issue of this writ by the above-named Plaintiff **CHARLES KWABENA AMPONSAH**

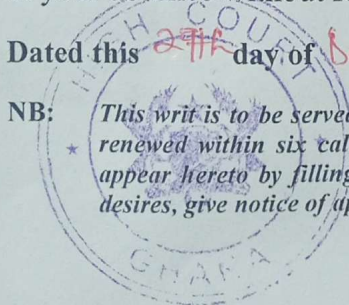
YOU ARE HEREBY COMMANDED that within EIGHT DAYS after service of this Writ on you inclusive of the day of service you do cause appearance to be entered for you. **GHANA NATIONAL ASSOCIATION OF TEACHERS (GNAT), REV. ISAAC OWUSU, THOMAS MUSAH, MAHMUD ISSAH**

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

Dated this ~~27th~~ day of Dec, 2025 Chief Justice of Ghana

**R. 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 filling a notice of appearance either personally or by lawyer may, if he desires, give notice of appearance by post.*



SEALED

HIGH COURT ACCRA

The Plaintiff claims against the defendants the following reliefs;

- a) A declaration that the delegate selection process in the Adansi West district and other relevant parts of the Ashanti Region including Adansi East, Afigya Kwabre, Afigya Sekyere, Ahafo Ano South, Atwima, Sekyere East, Sekyere West and Amansie East districts of the 1st defendant that was used to select delegates for the 1st defendant Association's Regional and National Delegates Conference specifically the National Elections fixed for 7th January, 2026 contravenes the provisions of the 1st defendant Constitution and Rules 2022.
- b) A declaration that the delegates record book intended to be used for the upcoming National Elections at the National Delegates Conference of the 1st defendant is irregular and inconsistent with the 1st defendant Constitution and Rules, 2022 and does not accurately represent the will of the members of the 1st defendant.
- c) An order directed at the defendants to Conduct fresh, transparent elections of delegates at the district levels in Adansi West , Adansi East, Afigya Kwabre, Afigya Sekyere, Ahafo Ano South, Atwima, Sekyere East, Sekyere West and Amansie East districts of the 1st defendant in the Ashanti Region to elect delegates to the Regional and National Conferences of the 1st defendant before the upcoming National Elections can take place.
- d) An order directed at the defendants to review and update the Delegates Record Book intended to be used for the upcoming election of National Officers of the 1st defendant, to accurately represent the true will of the members as stipulated by the 1st defendant Constitution and Rules 2022 before conducting any National Elections of the 1st defendant's association.
- e) An order directed at the defendants to implement corrective measures to redress the consequences stemming from the unconstitutional delegate participation at the 2025 Regional Conferences.
- f) Perpetual injunction restraining the defendants, their agents, assigns, etc from conducting the upcoming National Elections at the National Conference of the 1st defendant fixed for 7th January, 2026 with the current delegates register.
- g) Cost including solicitor's fees in accordance with Ghana Bar Association scale of fees.
- h) Any other relief(s) that the court may deem fit to make in the circumstance of this case.

.....
SOLICITOR FOR PLAINTIFF
CHAMBER REG. NO: epp00102/25
SOLICITORS LICENSE NO: eASH02166/25

This writ was issued by
Whose address for service is:

BILL GRAHAM OSEI AKOMEA, ESQ.
BILL GRAHAM OSEI AKOMEA, ESQ.,
AKOMEA AND ASSOCIATES PRUC
PLOT 5051, BOMSO -KUMASI.

BILL GRAHAM OSEI AKOMEA, ESQ.
(LLB, BL, LLM)
ATTORNEY AT LAW
AKOMEA & ASSOCIATES PRUC
PLOT 5051, BOMSO -KUMASI

Filed on 29/12/25
at 12:02
am/pm
Registrar
ACCRA

IN THE SUPERIOR COURT OF JUDICATURE
IN THE HIGH COURT OF JUSTICE
ACCRA-GREATER ACCRA REGION

CHARLES KWABENA AMPONSAH
H/NO. AF11, AKROKERRI, ASHANTI REGION } **PLAINTIFF**
VRS

1. GHANA NATIONAL ASSOCIATION OF
TEACHERS (GNAT)
TEACHERS HALL-GNAT HOSTEL, ACCRA
2. REV. ISAAC OWUSU
PRESIDENT, GNAT
ACCRA.
3. THOMAS MUSAH
GENERAL SECREATARY, GNAT
ACCRA.
4. MAHMUD ISSAH ZAKARY
CHAIRMAN OF ELECTION COMMITTEE
GNAT, ACCRA. } **DEFENDANTS**
PLAINTIFF SHALL DIRECT SERVICE

STATEMENT OF CLAIM

1. The Plaintiff is a teacher and a member of the 1st defendant association, and it is in that capacity that he institutes this action.
2. The 1st defendant is an association of teachers in Ghana registered under the laws of the Republic of Ghana.
3. The 1st defendant is also a registered Trade Union under section 84 of the Labour, Act, 2003 (Act 651).
4. The 2nd defendant is the President of the 1st defendant Association and it is in that capacity that he has been sued.
5. The 3rd defendant is the General Secretary of the 1st defendant Association and it is in that capacity that he has been sued.
6. The 4th defendant is the Chairman of the 1st defendant Association's Election Committee (GNATEC) and it is in that capacity that he has been sued.

7. The Plaintiff states that he is a dues-paying member of the 1st defendant association.
8. The Plaintiff states that the 1st defendant's constitutional framework dictates that representation must emerge democratically from the grassroots level.
9. The Plaintiff states that the 1st defendant's association is structured in such a way that it is divided into basic units, local branches, district branches, regional branches and the national level.
10. The Plaintiff states that the basic unit of the 1st defendant association is an educational institution or education office where a number of the teachers is registered with the 1st defendant association.
11. The Plaintiff states that a local branch of the 1st defendant consist of all members of the basic units in a local authority area or an educational institution so designated by the Regional Council of the 1st defendant on the recommendation of the District Council of the 1st defendant concerned.
12. The Plaintiff states that membership of a district branch of the 1st defendant consist of all members of the 1st defendant association in the district created by its National Council.
13. The Plaintiff states that the 2022 Constitution of the 1st defendant stipulates that whereas a local conference is the highest decision-making body in a local area, a district conference is the highest decision-making body of a district branch of the 1st defendant association, a regional conference is the highest decision-making body of a regional branch, the national delegates conference is the highest decision-making body of the 1st defendant.
14. It is the Plaintiff's case that per the 1st defendant's Constitution and Rules 2022, Delegates at the District Conference of the 1st defendant are to be elected by the various Local conferences, not appointed or nominated by any individual or executive body.
15. The Plaintiff repeats the immediately preceding paragraph and avers that this established practice is not merely a tradition but

serves as the foundation of the 1st defendant representative governance system, facilitating legitimate passage of authority from the Local levels to the District levels, then to the Region level, and ultimately to the national level.

16. The Plaintiff states that per the 1st defendant's Constitution and Rules that came to force in 2022 each local conference shall elect their representatives to the district conference and the district conferences shall elect their delegates to represent its members at the Regional and National Conferences.
17. The Plaintiff repeats the immediately preceding paragraph and states that, unfortunately the 1st defendant's 2025 Adansi West District Conference did not adhere to these requirements.
18. The Plaintiff avers that instead of allowing the local conferences to elect their representatives to the district conference and the district conferences the opportunity to elect their representatives to the Regional and National conferences as the 1st defendant's Constitution and Rules 2022 provides, the then regional executives took over the process and imposed names on the delegate list by handpicking delegates at the district conferences.
19. The Plaintiff repeats the immediately preceding paragraph and states that, some Locals were assigned two imposed delegates, whilst others were entirely denied representation and the Plaintiff shall tender evidence of same at the hearing of the case.
20. The Plaintiff states that these breaches mentioned above occurred in the Adansi West District and in other designated areas of the Ashanti Region including the Adansi East, Afigya Kwabre, Afigya Sekyere, Ahafo Ano South, Atwima, Sekyere East, Sekyere West and Amansie East districts of the 1st defendant.
21. The Plaintiff repeats the immediately preceding paragraph and avers that such practices are not only unjust but fundamentally undermine the democratic integrity of the defendant and deny members their right to adequate representation.
22. The Plaintiff states that the delegates unlawfully selected/handpicked at the said district levels subsequently

participated in and voted at the 2025 Ashanti Regional Conference, resulting in the election of the current 2025 Regional Executives.

23. The Plaintiff repeats the immediately preceding paragraph and states that the entire regional leadership structure is thus founded upon a constitutionally invalid process.

24. The Plaintiff states that the situation poses further risks, as these same individuals—whose mandate is devoid of constitutional legitimacy—are expected to represent the districts and regions at the forthcoming 2026 National Conference, where new National Executives of the 1st defendant will be elected.

25. The plaintiff states that any election conducted under such a flawed representational framework cannot be deemed legitimate since it undermines the sovereignty of the Local structure of the 1st defendant, disrupts the chain of representation, and presents a direct threat to the credibility of the 1st defendant's impending national elections.

26. The Plaintiff states that, the Delegates Record Book, which is essential for validating delegates, thus lacks credibility, legitimacy, reliability and consistency since its entries do not accurately represent the electoral mandate of the Local structure of the 1st defendant as dictated by its Constitution and, in its current form, may favour individuals while excluding others intentionally.

27. The Plaintiff repeats the immediately preceding paragraph and states that the situation raises the suspicion that the irregularities may have been systematically orchestrated to skew representation in favour of specific interests.

28. The Plaintiff states that one of the then regional executives who spearheaded this said illegality is Prosper Tachie and he is one of the candidates for the position of National President at the forthcoming National elections of the 1st defendant slated for 7th January, 2026 .

29. The Plaintiff states that the above described illegality is also contained in the report of the National GNAT Election Committee

submitted to the National Council Meeting of the 1st defendant in November, 2025.

30. The Plaintiff states that on 7th November 2025 he personally wrote a letter to the 1st defendant through the 3rd defendant requesting the defendants to investigate the matter and ensure equitable and constitutional representation of all members in the region however, no action has been taken by the defendants since that time.

31. The Plaintiff states that on 25th November 2025 he again wrote a letter through his solicitors to the 1st defendant through the 3rd defendant for the defendants to take conscious effort to remedy the imbalance that the unconstitutional selection of delegates has caused and will cause in the upcoming elections, yet no action has been taken by the defendants hence this action.

32. The Plaintiff states that the defendants herein have plans far advanced to hold a national elections on the 7th January, 2026 and he is a candidate for the National President position.

33. The Plaintiff states that the 4th defendant is the chairman of the committee that is tasked to over see the said elections but has failed to act on his said two letters written to the 1st defendant through the 3rd defendant..

34. The Plaintiff states that due to the said illegal actions complained above, he has been denied voting rights in the upcoming National elections of the 1st defendant even though he is a candidate.


35. The Plaintiff states that the said Prosper Tachie stands to benefit from the said illegalities complained above since it is these delegates he handpicked who shall be voting in the upcoming National Elections.

36. The Plaintiff states that unless restrained by orders of this honourable court, the defendants shall go ahead and organise the said National elections with the faulty voters register and the delegates whose selection breaches the 1st defendant Constitution.

37. Wherefore the Plaintiff claims against the defendants the reliefs endorsed on the writ of summons.

- a) A declaration that the delegate selection process in the Adansi West district and other relevant parts of the Ashanti Region including Adansi East, Afigya Kwabre, Afigya Sekyere, Ahafo Ano South, Atwima, Sekyere East, Sekyere West and Amansie East districts of the 1st defendant that was used to select delegates for the 1st defendant Association's Regional and National Delegates Conference specifically the National Elections fixed for 7th January, 2026 contravenes the provisions of the 1st defendant Constitution and Rules 2022.
- b) A declaration that the delegates record book intended to be used for the upcoming National Elections at the National Delegates Conference of the 1st defendant is irregular and inconsistent with the 1st defendant Constitution and Rules, 2022 and does not accurately represent the will of the members of the 1st defendant.
- c) An order directed at the defendants to Conduct fresh, transparent elections of delegates at the district levels in Adansi West , Adansi East, Afigya Kwabre, Afigya Sekyere, Ahafo Ano South, Atwima, Sekyere East, Sekyere West and Amansie East districts of the 1st defendant in the Ashanti Region to elect delegates to the Regional and National Conferences of the 1st defendant before the upcoming National Elections can take place.
- d) An order directed at the defendants to review and update the Delegates Record Book intended to be used for the upcoming election of National Officers of the 1st defendant, to accurately represent the true will of the members as stipulated by the 1st defendant Constitution and Rules 2022 before conducting any National Elections. of the 1st defendant's association.
- e) An order directed at the defendants to implement corrective measures to redress the consequences stemming from the unconstitutional delegate participation at the 2025 Regional Conferences.
- f) Perpetual injunction restraining the defendants, their agents, assigns, etc from conducting the upcoming National Elections at the National Conference of the 1st defendant fixed for 7th January, 2026 with the current delegates register.
- g) Cost including solicitor's fees in accordance with Ghana Bar Association scale of fees.
- h) Any other relief(s) that the court may deem fit to make in the circumstance of this case.

**DATED AT AKOMEA AND ASSOCIATES PRUC THIS 19TH DAY
OF DECEMBER 2025**


.....
SOLICITOR FOR PLAINTIFF
BILL GRAHAM OSEI AKOMEA, ESQ.
CHAMBER REG. NO: Epp00102/25
SOL. LICENCE NO: Eash02166/25

BILL GRAHAM OSEI AKOMEA, ESQ.
(LLB, BL, LLM)
ATTORNEY AT LAW
AKOMEA & ASSOCIATES PRUC
PLOT 5051, BOMSO - KUMASI

IN THE SUPERIOR COURT OF JUDICATURE
IN THE HIGH COURT OF JUSTICE
ACCRA-GREATER ACCRA REGION

29/12/25
2:00 am/pm

CHARLES KWABENA AMPONSAH
H/NO. AF11, AKROKERRI, ASHANTI REGION
VRS

Registrar
GENERAL JURISDICTION LSC-ACCRA
PLAINTIFF/
APPLICANT

- 1. GHANA NATIONAL ASSOCIATION OF
TEACHERS (GNAT)
TEACHERS HALL-GNAT HOSTEL, ACCRA**
 - 2. REV. ISAAC OWUSU
PRESIDENT, GNAT
ACCRA.**
 - 3. THOMAS MUSAH
GENERAL SECRETARY, GNAT
ACCRA.**
 - 4. MAHMUD ISSAH ZAKARY
CHAIRMAN OF ELECTION COMMITTEE
GNAT, ACCRA.**
- PLAINTIFF SHALL DIRECT SERVICE**

GW/0279/2026
DEFENDANTS
RESPONDENTS

MOTION ON NOTICE FOR INTERLOCUTORY INJUNCTION
PURSUANT TO ORDER 25 OF C.I. 47

MOTION ON NOTICE BY BILL GRAHAM OSEI AKOMEA ESQ.
of Akomea and Associates PRUC, Kumasi, Counsel for and on behalf of
Plaintiff/Applicant herein praying this Honourable court for an order of
Interlocutory Injunction restraining the Defendants/Respondents herein,
their agents, assigns, privies and/ or workmen etc. from conducting the 1st
defendant's National Elections fixed for 7th January, 2026 or any National
Elections pending the final determination of the suit as per the grounds
stated in the supporting affidavit.

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

Act COURT TO BE MOVED ON *THURS* the *15TH* day of
JAN 202*6* at 9:00 O'clock in the forenoon or so soon thereafter as
Counsel for the Plaintiff/Applicant may be heard.

DATED AT AKOMEA AND ASSOCIATES PRUC KUMASI THIS
19TH DAY OF DECEMBER, 2025

.....
BILL GRAHAM OSEI AKOMEA, ESQ.
(LLB, BL, LL.M)
ATTORNEY AT LAW
AKOMEA & ASSOCIATES PRUC
PLOT 5051, BOMSO - KUMASI
SOLICITOR FOR PLAINTIFF
SOLICITOR'S LICENCE: eASH002166/25
CHAMBER REG. NO: epp00102/25

THE REGISTRAR
HIGH COURT
ACCRA

AND COPY FOR SERVICE ON DEFENDANTS/RESPONDENTS
HEREIN.

Filed on 29/12/25
at 2:00 am/pm
Registrar
GENERAL JURISDICTION

IN THE SUPERIOR COURT OF JUDICATURE
IN THE HIGH COURT OF JUSTICE
ACCRA-GREATER ACCRA REGION

CHARLES KWABENA AMPONSAH } **PLAINTIFF/**
H/NO. AF11, AKROKERRI, ASHANTI REGION } **APPLICANT**
VRS

**1. GHANA NATIONAL ASSOCIATION OF
TEACHERS (GNAT)
TEACHERS HALL-GNAT HOSTEL, ACCRA**
**2. REV. ISAAC OWUSU
PRESIDENT, GNAT
ACCRA.**
**3. THOMAS MUSAH
GENERAL SECRETARY, GNAT
ACCRA.**
**4. MAHMUD ISSAH ZAKARY
CHAIRMAN OF ELECTION COMMITTEE
GNAT, ACCRA.**
PLAINTIFF SHALL DIRECT SERVICE

**DEFENDANTS
RESPONDENTS**

AFFIDAVIT IN SUPPORT OF MOTION

I, CHARLES KWABENA AMPONSAH of H/NO AF11,
AKROKERRI, in the ASHANTI REGION of the Republic of Ghana do
make oath and say as follows:

1. That I am the deponent herein and the Plaintiff/Applicant hereto.
2. That the matters deposed to are those within my personal knowledge or belief except on matters of law which I have been advised by counsel, and I verily believe same to be true.
3. That at the hearing of the instant application my counsel shall seek leave of this honourable court to refer to all processes filed in this suit as if same had been set out in this affidavit and sworn to on oath.
4. That I commenced the instant action against the defendants for the reliefs endorsed on the writ of summons and a copy of the writ and statement of claim are herewith attached as **EXHIBIT A.**

5. That the defendants are yet to enter appearance and file their statement of defence.
6. That I am a teacher and a member of the 1st defendant association, and it is in that capacity that I institute this action.
7. That the 1st defendant is an association of teachers in Ghana registered under the laws of the Republic of Ghana.
8. That the 1st defendant is also a registered Trade Union under section 84 of the Labour, Act,2003 (Act 651).
9. That the 2nd defendant is the President of the 1st defendant Association and it is in that capacity that he has been sued.
10. That the 3rd defendant is the General Secretary of the 1st defendant Association and it is in that capacity that he has been sued.
11. That the 4th defendant is the Chairman of the 1st defendant Association's Election Committee (GNATEC) and it is in that capacity that he has been sued.
12. That I am a dues-paying member of the 1st defendant association. A copy of my pay slip as proof that my GNAT dues is deducted from my salary is herewith attached as **EXHIBIT B**.
13. That Plaintiff the 1st defendant's constitutional framework dictates that representation must emerge democratically from the grassroots level.
14. That the 1st defendant's association is structured in such a way that it is divided into basic units, local branches, district branches, regional branches and the national level.
15. That the basic unit of the 1st defendant association is an educational institution or education office where a number of the teachers is registered with the 1st defendant association.
16. That a local branch of the 1st defendant consist of all members of the basic units in a local authority area or an

educational institution so designated by the Regional Council of the 1st defendant on the recommendation of the District Council of the 1st defendant concerned.

17. That membership of a district branch of the 1st defendant consist of all members of the 1st defendant association in the district created by its National Council.

18. That the Constitution and Rules of the 1st defendant stipulates that whereas a local conference is the highest decision-making body in a local area, a district conference is the highest decision-making body of a district branch of the 1st defendant association, a regional conference is the highest decision-making body of a regional branch, the national delegates conference is the highest decision-making body of the 1st defendant. A copy of the Constitution is herewith attached as **EXHIBIT C**.

19. That per the 1st defendant's Constitution and Rules 2022 (which is EXHIBIT C herein), Delegates at the District Conference of the 1st defendant are to be elected by the various Local conferences, not appointed or nominated by any individual or executive body.

20. That this established practice is not merely a tradition but serves as the foundation of the 1st defendant representative governance system, facilitating legitimate passage of authority from the Local levels to the District levels, then to the Region level, and ultimately to the national level.

21. That per the the 1st defendant's Constitution and Rules that came to force in 2022, each local conference shall elect their representatives to the district conference and the district conferences shall elect their delegates to represent its members at the Regional and National Conferences.

22. That unfortunately the 1st defendant's 2025 Adansi West District Conference did not adhere to these constitutional requirements.

23. That instead of allowing the local conferences to elect their representatives to the district conference and the district conferences the opportunity to elect their representatives to the Regional and National conferences as the 1st defendant's Constitution and Rules 2022 provides, the then regional executives took over the process and imposed names on the delegate list by handpicking delegates at the district conferences.

24. That some Locals were assigned two imposed delegates, whilst others were entirely denied representation.

25. That some of the delegates imposed on the districts by the said then Regional Executives to represent various districts at the National level include Stephen Agyemang K Duah (Adansi West), Eric Ofori-Ansah (Adansi West), Rose Duun (Adansi West), Emmanuel Ennin (Adansi East), Akosua Frimpomaa (Afigya Kwabre), Diana Berkoh (Afigya Sekyere), Kwadwo Kankam (Ahafo Ano South), Esther Donkor (Atwima), Charles Toku (Sekyere East), Isaac Osei Frimpong (Sekyere West) and Rabiatsu Naah Sigri (Amansie West).

26. That these breaches mentioned above occurred in the Adansi West District and in other designated areas of the Ashanti Region including the Adansi East, Afigya Kwabre, Afigya Sekyere, Ahafo Ano South, Atwima, Sekyere East, Sekyere West and Amansie East districts of the 1st defendant .

27. That such practices are not only unjust but fundamentally undermine the democratic integrity of the defendant and deny members their right to adequate representation.

28. That the delegates unlawfully selected/handpicked at the said district levels subsequently participated in and voted at the 2025 Ashanti Regional Conference, resulting in the election of the current 2025 Regional Executives.

29. That the entire regional leadership structure is thus founded upon a constitutionally invalid process.

30. That the situation poses further risks, as these same individuals—whose mandate is devoid of constitutional legitimacy—are expected to represent the districts and regions at the forthcoming 2026 National Conference, where new National Executives of the 1st defendant will be elected.

31. That any election conducted under such a flawed representational framework cannot be deemed legitimate since it undermines the sovereignty of the Local structure of the 1st defendant, disrupts the chain of representation, and presents a direct threat to the credibility of the 1st defendant's impending national elections.

32. That the Delegates Record Book, which is essential for validating delegates, thus lacks credibility, legitimacy, reliability and consistency since its entries do not accurately represent the electoral mandate of the Local structure of the 1st defendant as dictated by its Constitution and, in its current form, may favour individuals while excluding others intentionally. A copy of the Delegates Record Book is herewith attached as **EXHIBIT D series**.

33. That the situation raises the suspicion that the irregularities may have been systematically orchestrated to skew representation in favour of specific interests.

34. That one of the then regional executives who spearheaded this said illegality is Prosper Tachie and he is one of the candidates for the position of National President at the forthcoming National elections of the 1st defendant slated for 7th January, 2026. A copy of the Notice of Poll is herewith attached as **EXHIBIT E**.

35. That the above described illegality is also contained in the report of the National GNAT Election Committee submitted to the National Council Meeting of the 1st defendant in November, 2025. A copy of the report is herewith attached as **EXHIBIT F**.

36. That on 7th November 2025 I personally wrote a letter to the 1st defendant through the 3rd defendant requesting the

defendants to investigate the matter and ensure equitable and constitutional representation of all members in the region however, no action has been taken by the defendants since that time. A copy of the said letter is herewith attached as **EXHIBIT G**.

37. That on 25th November 2025 I caused my solicitors to write to the 1st defendant through the 3rd defendant for the defendants to take conscious effort to remedy the imbalance that the unconstitutional selection of delegates has caused and will cause in the upcoming elections, yet no action has been taken by the defendants hence this action. A copy of the said letter is herewith attached as **EXHIBIT H**.

38. That the defendants herein have plans far advanced to hold a national elections on the 7th January, 2026 and I am a candidate for the National President position as shown on EXHIBIT E above. A copy of program of activities and Agenda for the National Delegates Conference is herewith attached as **EXHIBIT J**.

39. That the 4th defendant is the chairman of the committee that is tasked to oversee the said elections but has failed to act on his said two letters written to the 1st defendant through the 3rd defendant.

40. That due to the said illegal actions complained above, I have been denied voting rights in the upcoming National elections of the 1st defendant even though I am a candidate.

41. That the said Prosper Tachie stands to benefit from the said illegalities complained above since it is these delegates he handpicked who shall be voting in the upcoming National Elections.

42. That unless restrained by orders of this honourable court, the defendants shall go ahead and organise the the said National elections with the faulty voters register and the delegates whose selection breaches the 1st defendant Constitution.

43. That from all indications the defendants are refusing to act on the said report of the Election Committee as well as my two letters because they want to do everything possible to see that the said Prosper Tachie wins the said upcoming elections.

44. That I shall suffer greater hardship if this application is refused.

45. That the defendants shall not suffer any hardship if this application is granted.

46. That I am willing to compensate the defendants if this application is granted and in the unlikely event that the case is finally determined in favour of the defendants/respondents.

47. That if not restrained by the orders of this honourable court, the defendants/respondents shall go ahead and hold the National elections with the said flawed delegates record book/register.

48. That I have been advised by counsel and I verily believe same to be true that in the circumstance, this honourable court has jurisdiction to grant the present application.

49. That I humbly pray that this application is granted.

50. WHEREFORE I depose to this affidavit in support of the present application.

SWORN AT ACCRA

THIS 25th DAY OF Dec, 2025

DEPONENT

BEFORE ME

COMMISSIONER FOR OATHS

FELIX AKAKPO LAWEK
COMMISSIONER FOR OATHS
P. O. BOX TN 1933
TESHIE NUNGUA EST. ACCRA

IN THE SUPERIOR COURT OF JUDICATURE
IN THE HIGH COURT OF JUSTICE
ACCRA-GREATER ACCRA REGION

29/12/25
2:00 am/pm
Registrar
ACCRA

CHARLES KWABENA AMPONSAH
H/NO. AF11, AKROKERRI, ASHANTI REGION } **PLAINTIFF/**
VRS } **APPLICANT**

1. GHANA NATIONAL ASSOCIATION OF
TEACHERS (GNAT)
TEACHERS HALL-GNAT HOSTEL, ACCRA

2. REV. ISAAC OWUSU
PRESIDENT, GNAT
ACCRA.

3. THOMAS MUSAH
GENERAL SECRETARY, GNAT
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4. MAHMUD ISSAH ZAKARY
CHAIRMAN OF ELECTION COMMITTEE
GNAT, ACCRA.

DEFENDANTS
RESPONDENTS

PLAINTIFF SHALL DIRECT SERVICE

STATEMENT OF CASE IN SUPPORT OF MOTION FOR
INTERLOCUTORY INJUNCTION

My Lord, with the greatest of respect the Plaintiff/Applicant herein issued the instant writ of summons together with the statement of claim against the defendants/Respondents herein seeking the reliefs as endorsed thereon.

Respectfully, my Lord, the Plaintiff/Applicant has applied to this Honourable Court for an order of interlocutory injunction restraining the Defendants/Respondents herein, their agents, assigns, privies and/ or workmen etc. from conducting the 1st defendant's National Elections fixed for 7th January, 2026 or any National Elections pending the final determination of the suit.

My Lord, under Order 25 rule 1 of C.I 47, this Court has the power to grant an interlocutory injunction when it appears to the court to be just and convenient to do so. However, the rules do not define what is or when it is "just and convenient". Nevertheless, the factors to be

considered by the court to determine when it was just and convenient to grant or not to grant an injunction has been settled by decided cases.

My Lord, in the case of *American Cyanamid Co. V Ethicon Ltd* [1975] 1 ALL ER 504 at 509, the House of Lords introduced factors that must be considered by the court in determining an application for interlocutory injunction. The factors discussed in that case have been applied approvingly in Ghanaian cases including *BAIDEN V TANDO* [1991] 1 GLR 98, *CENTRACOOR V BOOHENE* [1992-1993] GBR 1512, CA, *VANDERPUYE V NARTEY* [1977] 1 GLR 428, CA, *FOOD SPECIALITIES GHANA LTD V TECHNICAS DE MULTICONSTRUCTION SA* [1987-88] 1 GLR 25, CA, *OWUSU V OWUSU-ANSAH* [2007-2008] SCGLR 870 SC, remain the test in our courts which with the kind permission of my Lord I quote;

“the object of the interlocutory injunction is to protect the plaintiff against injury by violation of his rights for which he could not be adequately compensated in damages recoverable in the action if the uncertainty were resolved in his favour at the trial; but the plaintiff’s need for such protection must be weighed against the corresponding need of the defendant to be protected against injury resulting from his having been prevented from exercising his or her legal right which he could not be adequately compensated under the plaintiff’s undertaking in damages if the uncertainties were resolved in the defendant’s favour at the trial. The court must weigh one

My Lord, it is trite law that the grant of interlocutory injunction is to preserve the subject matter of the dispute pending the final determination of the substantive suit. It is to ensure that the balance is evenly held as between the parties. It is in the light of these that the courts over the years through decided cases have laid down principles that need to be applied in granting this discretionary remedy.

In *WELFORD QUARCOO V ATTORNEY GENERAL AND ANOTHER* [2012] 1 SCGLR 259 at 260, Dr. Date-Baah, JSC as he then was (sitting as a single Justice of the Supreme Court) held that in granting interlocutory injunction, the following requirements have to be followed:

- (a) First the applicant must establish that there is serious question to be tried and that the suit is not frivolous or vexatious

(b) Secondly, that he or she would suffer irreparable damage which cannot be remedied by the award of damage, unless the interlocutory injunction is granted.

(c) Finally, the balance of convenience of course, means weighing up the disadvantages of granting the relief against the disadvantages of not granting the relief.

My Lord, with respect, the present action and its subsequent application cannot be said to be frivolous or vexatious. Perusing the affidavit in support of the motion for interlocutory injunction, it's obvious that the defendant/respondent is a due paying member of the 1st defendant association.

The crust of the Plaintiff/Applicant's case is the delegates from a number of district of the Ashanti Region who are to vote at the National Elections of the 1st defendant were handpicked by one of the candidates of the elections together with others instead of being elected as stipulated by the 1st defendant constitution. All efforts by the plaintiff to get the right thing to be done have proofed futile.

It is our submission that there is a serious issue to be tried since the plaintiff/applicant alleges that should the elections be done with the current delegate record book, that would amount to a breach of their constitution and it will inure to the benefit of one of the candidates and to his disadvantage.

It is therefore our respectful submission that there is a prima facie case to be tried and that the present action by the plaintiff/applicant is not frivolous as same raises triable issues to be determined by this court.

It is our respectful submission that in order to preserve the status quo, the court exercises its discretion in favour of the plaintiff/applicant and orders the defendant/respondent, his agents or assigns or any other person claiming through him from conducting the elections pending the final determination of the substantive matter.

With regards to the third requirement stated in the case supra, weighing the advantages of granting the relief against the disadvantages of not granting same, it is our respectful submission that the plaintiff/applicant

stands to suffer more if the defendant/respondent is not restrained from conducting the elections pending the final determination of the case.

The Plaintiff/Applicant is prepared to compensate the Defendant/Respondent if this application is granted and in the unlikely event that the case is decided in the defendant's/respondent's favour.

It is in the light of this that the Plaintiff/Applicant humbly prays that this Honourable Court exercises its discretionary powers to restrain the defendants/respondents until final determination of this case.

We respectfully submit.

**DATED AT AKOMEA AND ASSOCIATES, KUMASI THIS 19TH DAY
OF DECEMBER, 2025.**

.....
SOLICITOR FOR PLAINTIFF/APPLICANT
CHAMBER REG. NO: epp00102/25
SOL. LICENSE NO: eASH002166/25

BILL GRAHAM OSEI AKOMEA, ESQ.
(LLB, BL, LLM)
ATTORNEY AT LAW
AKOMEA & ASSOCIATES PRUC
PLOT 5051, BOMSO - KUMASI

**THE REGISTRAR
HIGH COURT
ACCRA**

**AND COPIES FOR SERVICE ON THE DEFENDANT/RESPONDENT
HEREIN.**

Case 10: 84293
EXH A



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

WRIT ISSUED FROM:20.... SUIT No:

IN THE SUPERIOR COURT OF JUDICATURE
IN THE HIGH COURT OF JUSTICE
ACCRA-GREATER ACCRA REGION

CHARLES KWABENA AMPONSAH
H/NO. AF11, AKROKERRI, ASHANTI REGION
VRS

3000017797
PLAINTIFF

1. GHANA NATIONAL ASSOCIATION OF
TEACHERS (GNAT)
TEACHERS HALL-GNAT HOSTEL, ACCRA
2. REV. ISAAC OWUSU
PRESIDENT, GNAT
ACCRA.
3. THOMAS MUSAH
GENERAL SECREATARY, GNAT
ACCRA.
4. MAHMUD ISSAH ZAKARY
CHAIRMAN OF ELECTION COMMITTEE
GNAT, ACCRA.

DEFENDANTS

PLAINTIFF SHALL DIRECT SERVICE

To: DEFENDANT

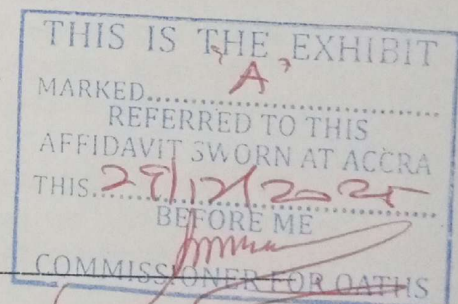
AN ACTION having been commenced against you by the issue of this writ by
the above-named Plaintiff **CHARLES KWABENA AMPONSAH**

YOU ARE HEREBY COMMANDED that within EIGHT DAYS after service
of this Writ on you inclusive of the day of service you do cause appearance to
be entered for you. **GHANA NATIONAL ASSOCIATION OF TEACHERS
(GNAT), REV. ISAAC OWUSU, THOMAS MUSAH, MAHMUD ISSAH**

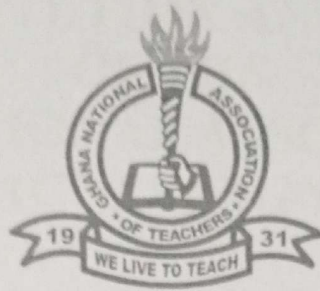
AND TAKE NOTICE that in default of your so doing, judgment may be given
in your absence without further notice to you

Dated this day of , 2025 Chief Justice of Ghana

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 filling a notice of appearance either personally or by lawyer may, if he
desires, give notice of appearance by post.



ExH C



CONSTITUTION AND RULES

OF THE

GHANA NATIONAL ASSOCIATION OF TEACHERS

(GNAT)

THIS IS THE EXHIBIT
MARKED C
REFERRED TO THIS
AFFIDAVIT SWORN AT ACCRA
THIS 29/12/2022
BEFORE ME
[Signature]
COMMISSIONER FOR OATHS

As Amended by
National Delegates Conference
January, 2022

ExH D

ELECTION DELEGATE



Name: STEPHEN AGYEMANG
K. DUAH
Region: Ashanti
District: Adansi West
Metropolitan
Phone: 0245340230
Position: District Delegate
SerialNum: 2026768

GNAT ELECTION DELEGATE



Name: ERIC OFORI-ANSAH
Region: Ashanti
District: Adansi West
Metropolitan
Phone: 0244484735
Position: District Delegate
SerialNum: 2026772

GNAT ELECTION DELEGATE



Name: ROSE DUUN
Region: Ashanti
District: Adansi West
Metropolitan
Phone: 0247131373
Position: District Delegate
SerialNum: 2026767

GNAT ELECTION DELEGATE



Name: DOMINICA TWUM
BOATENG
Region: Ashanti
District: Adansi West
Metropolitan
Phone: 0243488141
Position: District Delegate
SerialNum: 2026771

GNAT ELECTION DELEGATE



Name: BENJAMIN KUSI
Region: Ashanti
District: Adansi West
Metropolitan
Phone: 0542873406
Position: District Delegate
SerialNum: 2026770

GNAT ELECTION DELEGATE



Name: PROSPER MAAR
Region: Ashanti
District: Adansi West
Metropolitan
Phone: 0245141649
Position: District Chairman
SerialNum: 2026769

GNAT ELECTION DELEGATE



Name: LAWRENCIA TWUM
Region: Ashanti
District: Adansie East District
Phone: 0247595481
Position: District Delegate
SerialNum: 2026759

GNAT ELECTION DELEGATE



Name: ERNEST GYIMAH
Region: Ashanti
District: Adansie East District
Phone: 0243243197
Position: District Chairman
SerialNum: 2026758

GNAT ELECTION DELEGATE



Name: TOBIAS MALIK
Region: Ashanti
District: Adansie East District
Phone: 0240643481
Position: District Delegate
SerialNum: 2026762

GNAT ELECTION DELEGATE



Name: EMMANUEL ENNIN
Region: Ashanti
District: Adansie East District
Phone: 0243911262
Position: District Delegate
SerialNum: 2026761

THIS IS THE EXHIBIT
MARKED.....D.....
REFERRED TO THIS
AFFIDAVIT SWORN AT ACCRA
THIS 29th/12/2025
BEFORE ME
[Signature]
COMMISSIONER FOR OATHS

Afternoon - Syndicate Group Sessions
- Venue: UPSA

Evening - Plenary
- Venue: UPSA

Tuesday, 6th January , 2026

- Corporate Governance
- GNATEC Report
- Dissolution of the National Officers
- Presentation of Manifestos
- Venue: UPSA

Wednesday, 7th January , 2026 - Election of National Officers:

- Morning & Afternoon*
- Credentials Committee Report
 - Election arrangements
 - Election

- Evening*
- Investiture of New National Officers
 - Dinner Dance
 - Formal Closing of Conference
 - Venue: UPSA

Thursday, 8th January , 2026

- Morning* - Departure

74th Quinquennial (54th) National Delegates Conference - 2026

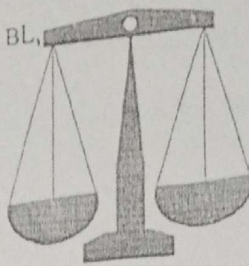
|| xxix ||

KINGDOM LAW CONSULTANTS

Barristers & Solicitors of the Supreme Court of Ghana

Mr. Ekow Arhin Sagoe, LLB (HONS), LLM (UK), BL,
Tel: (233) 55-3142853

Banker
Absa Bank
Obuasi



ADDRESS
P.O. Box 351,
Mangoase-Obuasi

Email:
Sagoeekow90@yahoo.com

LOCATION
Suite Nos. 2&3
Dove House Government
Hospital Road

Our Ref: OB-CC/20/340
Your Ref:

Date: 25TH NOVEMBER 2025

THE GENERAL SECRETARY
GHANA NATIONAL ASSOCIATION OF TEACHERS (GNAT)
NATIONAL HEADQUARTERS
ACCRA

Dear Sir,

UNCONSTITUTIONAL DELEGATE SELECTION AT 2025 DISTRICT
CONFERENCE – ADANSI WEST AND ASHANTI REGION; IMPLICATIONS
FOR 2026 NATIONAL CONFERENCE

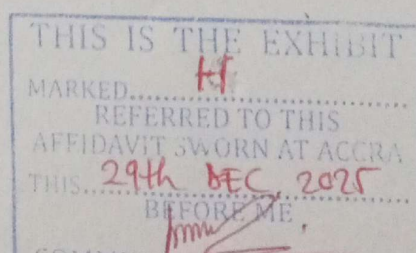
We are writing on behalf of Charles Kwabena Amponsah, a member of the Ghana National Association of Teachers (GNAT), regarding serious issues with the delegate selection process during the 2025 District Conference in Adansi West.

On 7 November 2025, Mr. Amponsah informed your office about the unconstitutional selection of delegates. Despite his communication, no actions have been taken to rectify this.

According to GNAT's constitution, delegates must be elected by their members, not imposed by executives. However, at the 2025 Adansi West District Conference, certain officers imposed names on the delegate list, denying some members representation while others had multiple delegates imposed on them. This undermines the integrity of GNAT's democratic process. This issue is confined to Adansi West and certain areas of the Ashanti Region, making it identifiable and fixable.

The unlawfully selected delegates then participated in the 2025 Ashanti Regional Conference, leading to the election of current Regional Executives based on this invalid process.

The legitimacy of these individuals is questionable, especially since they are set to represent the region at the upcoming 2026 National Conference. Elections conducted under this flawed system cannot be legitimate and threaten GNAT's credibility. Additionally, the Delegates Record Book used to validate delegates is unreliable and does not reflect the true will of the members, raising concerns about potential manipulation.



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CamScanner

To restore credibility and uphold democracy

1. Invalidate all delegates not duly elected by their Districts.
2. Conduct fresh, transparent elections for delegates in Adansi West and affected areas of the Ashanti Region.
3. Update the Delegates Record Book to accurately reflect the members' votes.
4. Address the aftermath of unconstitutional delegate participation in the 2025 Regional Conference.
5. Ensure only validated delegates participate in the 2026 National Conference.

If these concerns are not addressed, Mr. Amponsah will pursue legal action, including seeking an injunction against the 2026 National Conference and a declaration that the delegate selection process is unconstitutional.

We urge your office to treat this matter with utmost urgency.

Yours faithfully,

EROW ARHIN SAGOE ESQ
KINSHAWA LAW FIRM
DOWNTOWN GOMBEH TRD
MANASSA

EKOW ARHIN SAGOE ESQ.
LAWYER FOR CHARLES KWABENA AMPONSAH
SOLICITOR'S L/NO. eASH00163/25
CHAMBERS REG. NO. ePP09954/25

CC: CHARLES KWABENA AMPONSAH

NATIONAL EXECUTIVE COMMITTEE (GNAT)

REGIONAL SECRETARY (ASHANTI REGION)

DISTRICT SECRETARY (ADANSI WEST)

EXH G
ASARE BEDIAKO SENIOR HIGH SCHOOL

P.O. Box 40,

Akrokerri

November 7, 2025

The General Secretary
Ghana National Association of Teachers (GNAT)
Head Office, Accra

Through
The District Secretary
Ghana National Association of Teachers (GNAT)
Adansi West District, Obuasi

Dear Sir,

**UNFAIR SELECTION AND REPRESENTATION OF DELEGATES FOR THE 2026
NATIONAL CONFERENCE**

I write to express my concern and displeasure regarding the unfair and questionable mode of selection of delegates, as well as the lack of fair representation of members in the Adansi West District.

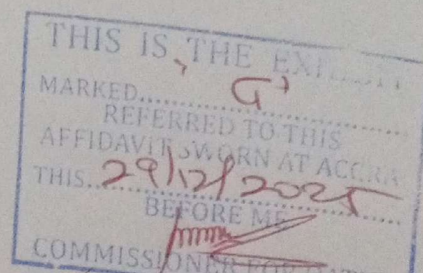
The 2025 District Conference was expected to elect delegates for both the Regional and National Conferences in accordance with the GNAT Constitution, Article 13(4)(c) & (d), which provides that:

“District Conference shall—

(c) elect delegates to the Regional Conference, in accordance with Article 16(3)(c) of the Constitution;

(d) elect delegates to the National Conference, in accordance with Article 20(3)(b) of the Constitution.”

It has been a long-standing tradition for local members (delegates) at the District Conference to elect representatives for both the Regional and National Conferences. During the 2021 District Conference, members (delegates) resolved that each local shall elect a delegate to represent its members at the Regional and National Conferences.



Unfortunately, this resolution was disregarded during the 2025 District Conference when Regional Executives took over the process and handpicked delegates. This action prevented District Conference delegates from exercising their constitutional right to elect representatives for both the Regional and National levels.

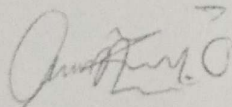
As a result, some locals had two delegates while others had none for the National Conference, creating an imbalance and undermining the democratic principles of the Association. My investigation further reveals that similar irregularities occurred in other districts within the Ashanti Region.

In the interest of fairness, transparency, peace, and strict adherence to the GNAT Constitution, I respectfully request your office to investigate this matter and take appropriate steps to ensure equitable and constitutional representation of all members in the Region.

Attached are:

1. The names and locals of delegates who were not elected by the District Conference but were handpicked from the Adansi West District.
2. A copy of the delegates' list for the Regional Conference, which includes unelected delegates and representatives from Senior High Schools, Senior High Technical Schools, and the District Education Office.

Yours faithfully,



[CHARLES KWABENA AMPONSAH]

(Concerned Member)

0559528548 / 0503351342

hanta83@yahoo.com

CC:

- GNAT Elections Committee (GNATEC)
- National Officers
- National Council
- Regional Secretary
- Regional Council
- Aspirants
- District Council

EXH F

GHANA NATIONAL ASSOCIATION OF TEACHERS
(GNAT)



REPORT OF THE NATIONAL GNAT ELECTIONS COMMITTEE
(GNATEC) TO NATIONAL COUNCIL MEETING - NOVEMBER, 2025

1.0 INTRODUCTION

The Ghana National Association of Teachers (GNAT) as a democratic institution periodically goes through elections to choose her leaders at all levels of the Association - Unit, Local, District, Regional and National levels. To strengthen the procedures for such elections, the National Council of the Association, in 2024 approved a document entitled Guidelines for the Conduct of Elections in GNAT out of which the GNAT Elections Committees (GNATECs) were put in place to regulate the conduct of Elections in GNAT.

This is the report of the National GNATEC which also captures highlights of the activities of the other levels in connection with their operations during the 2025 elections. The report details all the activities of the National GNATEC from the date of its formation till now.

2.0 FORMATION OF NATIONAL GNATEC

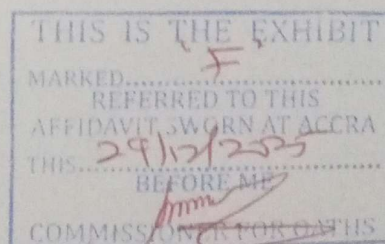
In accordance with section 3.2.1. of the Guidelines for the Conduct of Elections in GNAT (2024), the National Executive at an emergency meeting held on 16th January, 2025 elected the following as members of the National GNATEC:

- i. Mr. Mahmud Issah Zakary - National GNATEC Chairman
- ii. Mad. Yaa Kumi Yeboah - National GNATEC Member
- iii. Mr. David Kattah - National GNATEC Member

The General Secretary appointed the following as his representatives to the committee:

- i. Dr. Nicholas Taylor
- ii. Mr. Emmanuel Kwaboni

Mr. Bede Tuku (Esq.) serves as the Legal Consultant to the committee



However, Districts used different methods in the election of delegates to Regional and National Conferences which needs to be streamlined.

4.0 OBSERVATIONS

- i. In some Districts the issuing and endorsement of ballot papers were not properly done
- ii. Some District Chairmen and Secretaries as well as some Regional Chairmen and Secretaries were influencing the selection of delegates to Regional and National Conferences. Some of the officers names practically hijacked the election of delegates from the GNATECs. This was a worrying trend.
- iii. A GNATEC Chairman who wanted to contest as delegates to National Conference resigned at the Conference.
- iv. Serious cases of Monitisation of elections and vote - buying was becoming a worrying trend in GNAT Elections at even the lower levels. If the National GNATEC and National Council do not nib this unfortunate trend in the bud National Elections and future lower level elections could be won only by the highest bidders.
- v. There were isolated reports of inadequate publication of the elections in some Districts.
- i. Some of the Conferences started as early as 7:30AM with some closing as late as 9:00PM.

4.0 ADDENDUM TO THE AIDE - MEMOIRE AND BRIEFING FOR NATIONAL OFFICERS AND NATIONAL EXECUTIVE

In stead of National Council, the National GNATEC periodically updated the National Officers in two of their meetings. A detailed report with proposed plan of activities was presented by the National GNATEC to the National Executive at their meeting held on 8th July, 2025. The proposals with the action plan was approved for implementation.

The National GNATEC in collaboration with the GNAT Headquarters submitted a codified procedure for the replacement of delegates in a document entitled "*Addendum to the Aide - Memoire on Conference Elections 2025/2026*" which was duly discussed, approved by the National Executive and caused its circulation on 4th March, 2025.

5.0 NOMINATION FORMS

The National GNATEC designed the nominations forms for the National Elections, authenticated them and circulated same to the Basic Unit, Local, District and Regional branches in a letter dated 6th August, 2025. Same was put on all GNAT Platforms at all levels as well as the GNAT Website and the GNAT Social Media Platforms.



NOTICE OF POLL

NATIONAL DELEGATES CONFERENCE, JANUARY 2026 POSITION: NATIONAL PRESIDENT

We hereby give notice that the following persons have been duly nominated to contest the position of National President at the National Delegates Conference, January 2026 of the Ghana National Association of Teachers (GNAT)

| | | |
|---|-----------------------------|---|
|  | ISAAC OWUSU | DUTY POST: AAK DISTRICT EDUCATION OFFICE REGION: CENTRAL REGION |
|  | CHARLES KWABENA AMPONSAH | DUTY POST: ASARE BEDIAKO SHS REGION: ASHANTI REGION |
|  | PROSPER TACHIE | DUTY POST: T.I AHMADIYYA S.H.S REGION: ASHANTI REGION |

We hereby give notice that the poll shall be taken at UPSA Campus,
Legon Accra in the first week of January 2026. GNATEC