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ECW/CCJ/APP/32/25



**IN THE COMMUNITY COURT OF JUSTICE OF THE ECONOMIC
COURT OF WEST AFRICA STATES (ECOWAS)
HOLDEN AT ABUJA**

SUIT NO:

BETWEEN

GERTRUDE ARABA ESAABA SACKY TORKORNOO

)...APPLICANT

AND

THE REPUBLIC OF GHANA

)...RESPONDENT

**AN APPLICATION FOR ENFORCEMENT OF FUNDAMENTAL HUMAN RIGHTS
PURSUANT TO ARTICLES 9(4) AND 10(d) OF THE PROTOCOL OF THE COMMUNITY
COURT OF JUSTICE 1991 (AS AMENDED)**

A. NAME AND ADDRESS OF THE APPLICANT

The Applicant, Gertrude Araba Esaaba Sackey Torkornoo, is the Chief Justice of the Republic of Ghana and a citizen of Ghana residing at Chief Justice's Residence, Cantonments, Accra, Ghana.

B. DESIGNATION OF THE RESPONDENT

The Respondent, Republic of Ghana, is a Member State of ECOWAS, represented by its Attorney General and Minister of Justice, Ministerial drive, PB 60, Ministries Accra, Ghana.

C. SUBJECT MATTER OF PROCEEDINGS

1. This application is brought against the Republic of Ghana for violating the Applicant's fundamental rights under the African Charter on Human and Peoples' Rights, namely, right to fair hearing and due process (Article 7), right to dignity and protection from arbitrary treatment (Article 5), right to work (Article 15), presumption of innocence (Article 7(1)(b)).
2. These violations arise from the arbitrary suspension of the applicant as the Chief Justice of Ghana, arbitrary composition of a committee to inquire into petitions purportedly for her removal as Chief Justice of the Republic of Ghana and conduct of removal proceedings against the Applicant, in breach of Ghana's constitutional safeguards and international human rights obligations.

D. NARRATION OF FACTS

1. The Applicant is the duly appointed Chief Justice of the Republic of Ghana and has served Ghana's Judiciary with integrity and distinction over twenty years.
2. On 25th March, 2025, the Applicant was shocked to learn via news reports that the Spokesperson to the President of Ghana had released a press statement titled

“President Mahama Consultations with the Council of State on three (3) Petitions for the removal of the Chief Justice.”

3. Prior to this public announcement, the Applicant had not been notified of the existence of any petitions for her removal, nor had she been given any opportunity to respond.
4. Upon obtaining a copy of the press release online, the Applicant discovered that the President had allegedly received three petitions seeking her removal and had forwarded same to the Council of State to commence consultations under Article 146 of the Constitution of Ghana, 1992. (**Annex “GST 1”**)
5. Subsequent developments would show that the President had received two of the petitions in the middle of February, 2025, but waited until 25th March, 2025 (six clear weeks) before disclosing receipt of same via a press release to the public, whilst undertaking consultations with the Council of State. The Applicant viewed this development as a breach of her right to be heard, as well as a serious encroachment on the constitutionally protected independence of the Judiciary.
6. On 27th March 2025, the Applicant wrote to the President, respectfully requesting copies of the petitions to enable her to provide a response. (**Annex “GST 2”**)
7. The President responded on 29th March 2025, providing the Applicant with the requested copies of the petitions. (**Annex “GST 3”**)
8. The Applicant submitted detailed responses to each of the petitions, demonstrating that none of them disclosed valid grounds for her removal under Article 146. (**Annex GST 4**).
9. On the same day that the Applicant made request to the President for copies of the petitions against her – 27th March, 2025 - a Ghanaian citizen and Member of the Ghanaian Parliament, Hon. Vincent Ekow Assafuah, Concerned about the patent disregard for well-established constitutional principles of due process and the violation of the independence of the Judiciary manifest in the action of the President, just like many citizens were, filed a suit invoking the original jurisdiction of the Supreme Court of Ghana, challenging the constitutionality of the process initiated against the Applicant and seeking interim injunctive relief.
10. The suit referred to in the preceding paragraph was duly served on the Government of Ghana through its legal representative, the Attorney-General, who filed processes in the Supreme Court in response to the application for interlocutory injunction to restrain the President and the Council of State from proceeding on the consultation processes for the removal of the Chief Justice under article 146, or in any manner until the hearing and final determination of the instant action.
11. Despite the pendency of the application for injunction, which had actually come up for hearing in court on two occasions on which state attorneys from the Office of the Attorney-General were present (and the application for injunction had been adjourned by the Supreme Court), on 22nd April, 2025, the President issued a press release stating that a prima facie case had been established in respect of the three petitions

against the Chief Justice, following the conclusion of consultations with the Council of State. (**Annex “GST 5”**).

12. Later that same day - 22nd April, 2025 - the Applicant received a letter from the Office of the President, informing her that a prima facie case had been found in respect of the three petitions against her, and that she had been suspended as the Chief Justice of the Republic. A five-member committee was purportedly established to inquire into the matter. (**Annex “GST 6”**) suspension letter and warrant).
13. -The Applicant contends that this sequence of events constitutes multiple constitutional violations, including denial of natural justice, interference with judicial independence in Ghana, and breach of the principles of procedural fairness.
14. Around the same time, a pollster known to be closely aligned with the governing party, the National Democratic Congress (NDC) published an opinion poll in which he alleged that the Applicant was so unpopular that she had to be removed as Chief Justice. The publication of opinion polls on whether the Chief Justice of Ghana had to be removed was alien and offensive to the process of appointment and removal of a Chief Justice laid down in the Constitution of Ghana and the tenets of constitutionalism. (**Annex “GST 7”**).
15. In addition, there were multiple leaks to the media of documents purporting to be the petitions and the Applicant's responses thereto as well as extensive discussions in the media. These leaks, coupled with the pervasive media commentary, particularly by elements of the Government, and reporting across radio, television, and print outlets, caused enormous prejudice to the Applicant and the integrity of the entire process.
16. The Applicant contends that such widespread public discussion has undermined the confidentiality and fairness of the proceedings, rendering a fair inquiry impossible.
17. The Applicant asserts that in the circumstances of this particular case, justice, transparency and the public interest require a public hearing of the petitions to remove her from office rather than in camera proceedings. The Constitution of Ghana, generally, in order to ensure judicial accountability and assure effective justice to the people, requires all judicial proceedings to be in public, except where the concerns of public safety, public morality and public health will require otherwise.
18. The Applicant contends that the initiation of consultation with the Council of State before the Applicant was notified of the existence of the petitions, and invited to comment on them, violated her right to a fair hearing and Article 146 safeguards designed to protect judicial independence and tenure security.
19. The Applicant further contends that the President's purported prima facie determination was unconstitutional and a violation of her right to a fair trial. President's purported prima facie case determination contained no reasons or justification and failed to meet the standard of a judicious and objective assessment and, as such, was arbitrary and capricious.

20. The Applicant submits that the composition of the investigative committee was itself unconstitutional and in violation of the requirements of a justice.
21. The Chairman of the committee of inquiry, Justice Gabriel Scott Pwamang, had previously adjudicated in the Supreme Court, on cases affecting two of the petitioners and those matters were the subject of some of the allegations in two of the petitions against Applicant. Justice Pwamang had also ruled in favour of one of the petitioners in a Supreme Court matter in which the Applicant was a member of the panel. He was thus unqualified to sit as Chairman of a committee to inquire into petitions against the Applicant, emanating from the same matters, which could result in the removal of the Applicant as Chief Justice.
22. Similarly, Justice Samuel Kwame Adibu-Asiedu is disqualified, having already sat on the Supreme Court panel that heard the application for injunction challenging the same Article 146 proceedings.
23. It is also the contention of the Applicant that the other three members of the committee had not taken the constitutionally required oaths at the time of the committee's first sitting on 15th May 2025, before commencing upon the discharge of their functions and were therefore not qualified to undertake the function assigned to them.
24. The applicant further contends that a grave desecration of her constitutional rights to fair trial, dignity, and protection from inhuman and degrading treatment continued at the hearing of the committee.
25. On 15th May 2025, the first day of the committee's sitting, the Applicant's legal counsel who had earlier communicated with the committee and had a hearing notice served on him by the committee, was present before the committee, but the committee excluded him in planning and making arrangements for the hearing of the petitions, simply because the Applicant was not personally present.
26. Shockingly, the committee refused to recognise the very counsel upon whom it had served a hearing notice the previous day, and proceeded to schedule future hearings without involving him.
27. The Applicant was compelled to commence a suit in the Supreme Court against the Attorney-General and the members of the committee itself to challenge the constitutionality of the actions taken against her on 21st May, 2025.
28. The proceedings of the committee were adjourned to Thursday, 22nd May 2025, a day after she filed the present suit.
29. On 22nd May 2025, the applicant appeared before the committee in the company of her lawyers and informed the members of the committee about the suit instituted in the Supreme Court against the Attorney-General and the committee itself.
30. The committee requested copies of the court processes and adjourned its sitting to the next day, Friday, 23rd May 2025.

31. Strangely, on 23rd May 2025, despite being formally served with all the court processes including the application for interlocutory injunction, the committee indicated its firm resolve to continue with the proceedings against the applicant.
32. At the sitting on 23rd May 2025, the committee, contrary to rules regulating proceedings of committees and commissions of inquiry in Ghana, indicated its intention to conduct the hearing not as an inquiry – as directed by article 146 (7) of the Constitution of Ghana, but as a regular litigation in the courts of Ghana by jettisoning the use of the Commissions of Inquiry (Practice and Procedure) Rules, 2010 (C. I. 65), and stating its decision to rely on the High Court (Civil Procedure) Rules 2004 CI 47.
33. The committee proceeded to permit the petitioners not to give evidence themselves, but instead, call other witnesses to testify on their behalf.
34. The Applicant avers that in the absence of evidence on oath from the petitioner(s), the petition(s) cannot be deemed to have been properly admitted into the records of the committee, for any witness to be called to give evidence in support of the petition(s).
35. The Applicant says that she has been subjected to demeaning and discriminatory treatment, including denial of access to the hearing room for her husband and children, body searches conducted on her person and denial of access to mobile phones and laptops.
36. The Applicant also says that the hearings are being held within a high-security zone on the premises of the Castle, Osu a location completely detached from the Judiciary and devoid of judicial decorum and neutrality. This is in stark contrast to all other proceedings for the removal of Judges instituted under the laws of Ghana, which were all held in judicial facilities, particularly the Court Complex, and not in high-security installations.
37. The applicant contends that this choice of venue, combined with the systemic violations of her due process rights, is deliberately calculated to subject her to mental torture, public humiliation, and degrading treatment. The venue known as “Adu Lodge”, has a connection with a dark period in the history of the nation at which three High Court judges and a military officer were gruesomely murdered. The military officer who was murdered on that night happened to be the uncle and guardian of the Applicant with whom the Applicant was living at the time.
38. The Applicant further avers that the proceedings initiated against her are clearly a mockery of justice and a calculated effort to unjustly remove her from office under the guise of due process.
39. The Applicant states that to date, she has not been informed of the basis for the purported determination of a prima facie case against her, nor has she been made aware of the specific allegations forming that basis, which would enable her to determine her legal rights or properly prepare a defence.
40. The applicant contends that allowing the committee to proceed on the basis of these tainted processes will cause irreparable damage to her person, the Judiciary as institution in Ghana, and the entire constitutional order of the country.

41. These multiple procedural and constitutional irregularities render the process null and void, and continuing with it would cause grave injustice.
42. The applicant finally submits that this is a fit and proper case for this Honourable Court to intervene to protect her rights under the African Charter on Human and Peoples' Rights and uphold the constitutional and democratic order of Ghana.

E. JURISDICTION OF THE COURT

1. The ECOWAS Court has jurisdiction over this matter under Article 9(4) of the Protocol on the Court as amended, as the case concerns human rights violations by a Member State. Under Article 9(4) of the Protocol of the Court 1991 (as amended), the Court is granted the jurisdiction to determine cases of human rights violations that occur in any Member State.
2. Regarding material jurisdiction, the Applicant submits that the case concerns violations of the freedom of expression and the right to work, fundamental human rights respectively guaranteed by Articles 9 and 15 of the African Charter.
3. Regarding personal jurisdiction, the Respondent is an ECOWAS Member State which has ratified the Protocol of the Court and the African Charter and is therefore subject to this Court's jurisdiction in human rights cases. See *Ebrima Manneh v the Gambia*, (ECW/CCJ/APP/04/07; ECW/CCJ/ JUD/03/08) [2008] ECOWASCJ 7 (5 June 2008); *The Registered Trustees Of The Socio-Economic Rights & Accountability Project (SERAP) & Others Vs The Federal Republic Of Nigeria & 4 Others* ((Suit No: ECW/CCJ/APP/08/09; Rul. No: ECW/CCJ/APP/07/10); *Chude Mba v Republic of Ghana and Others* [2019] ECOWASCJ 30 (12 March 2019); *HADIJATOU MANI KORAOU V. REPUBI OF NIGER* (2004-2009) CCJELR @ pg. 217.
4. With respect to territorial and temporal jurisdiction of the Court, the Applicant submits that the events and actions of the Respondent forming the basis of the Application occurred in the Respondent state, and within a time period subsequent to the Respondent's ratification of the African Charter and the 2005 Supplementary Protocol of the Court.
5. Therefore, the Court has jurisdiction over the Application in accordance with Article 9(4) of the Protocol of the Court and its jurisprudence including *Isaac Mensah v Ghana* [ECW/CCJ/JUD/30/24] (paras 46-47)

F. ADMISSIBILITY OF THE APPLICATION

1. In line with the Court's jurisprudence, Article 10(d) of the Protocol of the Court requires that an application must satisfy three main admissibility conditions: (a) standing or victim status of the Applicant; (b) non-anonymity of the application; and (c) non- pendency of the Application before another international court. (See ***Kessei Menveinoyou v Togolese Republic*** [ECW/CCJ/JUD/34/24] paras 29-30).
2. The Applicant is the direct victim of the violations and is named and identified in this application. The matter is not pending before any other international court.

3. The application therefore meets the admissibility requirements under Article 10(d) of the Protocol and the Court's jurisprudence.
4. This Honourable Court has repeatedly upheld the human right of several community citizens to dignity of human person and fair hearing guaranteed by Articles 5 and 7 of the African Charter on Human and Peoples Rights.

G. **SUBMISSIONS ON THE MERITS**

(a) Violation of the Right to Fair Hearing, defence, and impartial tribunal (Article 7)

- i. The Applicant was not given a copy of either the prima facie determination or the reasons for the making of a prima facie finding by the President, before she was suspended by the President and a disciplinary committee formed.
- ii. This violates the right to a fair hearing before adverse action is taken. In **Zongo v. Burkina Faso (APP No: 013/2011, 1 HRL 4118 (ACTHPR 2015))** the African Court emphasized the need for fair and transparent proceedings. The arbitrary and opaque determination of a prima facie case against the Applicant without disclosure of reasoning violates the requirements of natural justice, especially the rule against *audi alteram partem*. It also violates her right to a fair trial.

iii. The President's purported prima facie determination, as communicated in the letter to the Applicant dated 22nd April 2025, contained no reasons or justification for stating that a prima case has been established against her, and was entirely devoid of the elements of judicial or quasi-judicial reasoning expected under the Constitution. The Ghanaian Supreme Court had previously held in a case - **Justice Paul Uter Dery v Tiger Eye Pl & 2 Others** [2015-2016] 2 SCGLR 812, that a prima facie determination of a petition against a judge, upon receipt of the responses by the judge, entails an assessment of the available evidence to ascertain whether the petition discloses serious issues that merit further investigation. Critically, the process of making prima facie determination constitutes a quasi-judicial act that must be anchored in due process and fairness.

iv. Fairness implies that the President in making the prima facie determination with the Council of State, must specify the particular charges in respect of which a prima facie case is deemed to have been established and the reasons for same. The President's letter failed to do this. It simply stated that a prima facie has been found against then Applicant without more. To date, the Applicant does not know the reasons for the President stating that a prima case has been established against her. Yet a committee has been formed and is working. The President's purported prima facie determination was no determination at all, as it failed to meet the standard of a judicious and objective assessment and, as such, was arbitrary and capricious.

v. Furthermore, the Applicant was not told the reasons for her suspension. The President's letter of 22nd April, 2025, in addition to stating that a prima facie case has been found against the Applicant and therefore a committee would be set up to inquire into the matter, proceeded to suspend the Applicant. No reasons were given for the suspension. The imposition of suspension is punishment since the Applicant has, to date, been relieved of

the performance of her functions as Chief Justice. The President's letter however, contained no reasons for suspending the Applicant.

vi. The Committee includes individuals with potential bias, which breaches the requirement of independent and impartial tribunals under Article 7(1)(d). The selection of committee members with prior involvement in the subject matter of the petitions offends the principle of *nemo iudex in causa sua* (no one should be a judge in their own cause). In **Justice Aladetoyinbo v Federal Republic of Nigeria** (Suit No ECW/CCJ/APP/27/18 and ECCJ Jud No. ECW/CCJ/JUD/18/20), the Plaintiff alleged that following a judgment he delivered, the dissatisfied judgment debtor wrote a petition against him to the NJC, the defendant's agency responsible for appointment, promotion and discipline of judicial officers, who constituted a committee whose proceedings were marred by irregularities but nevertheless issued him a warning.

vii. The Plaintiff claimed that his fundamental rights were violated as a result of a letter of warning issued to him in 2018 by the NJC and published with distortions in different the media. The plaintiff added that the actions of the defendant through its agent has traumatised and demoralised him and also destroyed his integrity, respect, honour and good name built over three decades of unblemished service to the defendant.

viii. On their part, the defendant – the Federal Republic of Nigeria – raised a preliminary objection challenging the jurisdiction of the Court to hear the matter and contended that the plaintiff was accorded fair hearing and that the committee was properly constituted. The defendant exonerated its agency, NJC, of wrongdoing and urged the Court to dismiss the matter.

ix. In the judgment, a panel of three judges of the Court led by Justice Edward Amoako Asante, contrary to the argument of the government said, the Court found the matter admissible and within its Jurisdiction, and stated that it has clearly established violation of the Applicant's right to fair hearing and right to work. This Honourable Court agreed with the plaintiff that the composition of the NJC committee that conducted the disciplinary investigation was irregular, thus incompetent and its decision null and void as it violates the applicant's right to fair hearing.

x. Consequently, the Court voided the disciplinary measure recommended by the National Judicial Council (NJC) against Justice S. E. Aladetoyinbo in 2018 while he was a judge of the High Court of the Federal Capital Territory (FCT). The court's said while it acknowledged that the plaintiff's right to fair hearing was violated, the plaintiff could not provide evidence of the prejudice suffered, but decided to make the historic award in recognition of the violation. The Plaintiff was therefore awarded N50 (fifty naira) as nominal damage for the violation of his right to fair hearing while undergoing disciplinary investigation for judicial misconduct by NJC, the body responsible for disciplinary issues among Nigerian judges and Justices.

(b) Violation of the Right to Dignity and Protection from Arbitrary Measures (Article 5)

- i. The process adopted is procedurally arbitrary, shrouded in secrecy, and leaked to the media in violation of constitutional confidentiality.
- ii. The reputational harm and emotional distress inflicted constitute a breach of dignity and mental integrity, protected under Article 5. The degrading treatment

of the Applicant in the course of proceedings, including surveillance-like restrictions and security harassment constitutes a violation of her dignity and bodily integrity.

- iii. In **Muhammad Ja'neh v Republic of Liberia** (Suit No ECW/CCJ/APP/33/19 and ECCJ Jud No. ECW/CCJ/JUD/28/20) this Honourable Court held that the Respondent had violated the Applicant's rights to fair hearing and work, coupled with his legitimate expectation by virtue of his appointment to work until retirement and earn pension as an Associate Justice of the Supreme Court of Liberia are subject to protection under all the international human rights instruments applicable and particularly as enshrined in the relevant provisions of the African Charter.
 - iv. Consequently, the Court ordered the Republic of Liberia, to restore, calculate and pay to the Applicant all his withheld entitlements, including salaries, allowances and pension benefits as from the date of his impeachment to the date of notification of this judgment.
 - v. The Court further ordered his reinstatement as an Associate Justice of the Supreme Court or in the alternative, to grant him the right to retire from service on the date of notification of this judgment with full pension benefits as if he had retired at the normal retirement age for justices of the Supreme Court. In addition, it ordered the government to pay the sum of US\$200,000 as reparation for moral prejudice suffered for the violation of his rights.
- (c) (Article 4(g) & (j) of the ECOWAS Democracy and Good Governance Protocol: guarantee of judicial independence and security of tenure.
- i. The Applicant has effectively been removed from her official capacity without a final determination, impairing her right to function and serve in a position she was constitutionally appointed to.
 - ii. The presumption of innocence has been undermined by public actions implying guilt before any determination by a competent body. The overall process represents an abuse of constitutional removal mechanisms as a façade to politically remove the head of the Judiciary, thereby threatening judicial independence, a fundamental cornerstone of democracy.
 - iii. In **Sam Sumana v Republic of Sierra Leone** (Suit No ECW/CCJ/APP/38/16; ECW/CCJ/JUD/19/17) [2017] ECOWASCJ 19 (27 November 2017) alleged that the defendant's Supreme Court betrayed him when it denied him fair hearing, and that President Bai Koroma prevented him from fully exploring the APC's internal dispute resolution mechanism by replacing him before the party's Appeal Committee.
 - iv. The defendant questioned the jurisdiction of the Honourable Court to hear and determine the Plaintiff's case on the grounds that the matter had been dismissed by the Supreme Court of the Republic of Sierra Leone. The Honourable Court dismissed the objection and said that although President

Bai Koroma has the powers to remove the Vice President, such powers must be exercised within the provision of the law.

- v. Justice Nwoke said: The constitution of his political party- APC, provides that any member aggrieved by the decision of the party has the right to appeal within 30 days but that the Plaintiff was sacked by his party on March 6, 2015, and he filed his notice of appeal on March, 26, 2015, the same day he was removed. Accordingly, the Court held that :“The removal of the applicant at a time he has not exhausted his right of appeal amounted to a violation of his right.”
- vi. The ECOWAS Court ruled that the removal of Vice-President Alhaji Sam Sumana (Photo) from office by President Ernest Bai Koroma in 2015 was wrongful and that as such it clearly violated his fundamental human rights to fair hearing and to freely participate in the politics of his country; rights guaranteed by the African Charter on Human Rights, the Revised ECOWAS Treaty, the Protocol establishing the ECOWAS Court and several other international conventions on human rights to all of which Sierra Leone is a signatory. The Court ordered that all the emoluments, allowances and other financial benefits be paid to the former Vice President as it will be calculated by the court's Registry.

H. RELIEFS SOUGHT

The Applicant respectfully prays the Court for the following reliefs:

- a. **A DECLARATION** that the suspension of the Applicant as the Chief Justice of the Republic of Ghana by the President of the Respondent's State on April 22, 2025 violated the Applicant's human rights to fair hearing guaranteed by Article 7 of the African Charter on Human and Peoples Rights.
- b. **A DECLARATION** that the panel instituted by the Respondent to investigate and determine the allegations of misconduct against the Applicant was not constituted to guarantee its independence and impartiality and as such has violated the Applicant's human right to fair hearing guaranteed by Article 7 of the African Charter on Human and Peoples' Rights.
- c. **A DECLARATION** that the purported suspension of the Applicant as the Chief Justice of the Republic of Ghana by the President of the Respondent State on April 22, 2025 constitutes a violation of her human right to fair equitable and satisfactory conditions guaranteed by Article 15 of the African Charter on Human and Peoples' Rights.
- d. **A DECLARATION** that the purported suspension of the Applicant as the Chief Justice of the Republic of Ghana by the President of the Respondent State on April 22, 2025 has exposed her to public ridicule and odium locally and internationally and the said act constitutes a violation of his human right to dignity guaranteed by Article 5 of the African Charter on Human and Peoples' Rights.

- e. **A DECLARATION** that by subjecting the Applicant to an illegal and an unfair investigation and trial since April 2025, the Respondent has inflicted injuries on her professional standing and image, thereby exposing her and her family to immeasurable public ridicule.
- f. **AN ORDER** to the Respondent Republic to act immediately to prescribe the rule of procedure to govern the investigation of allegations of misconduct against the Chief Justice of the Republic of Ghana in conformity with the right to fair hearing guaranteed by the Constitution of Ghana and the African Charter on Human and Peoples' Rights.
- g. **AN ORDER** directing the Respondent to immediately lift the suspension and restore the Applicant to full office until the conclusion of fair constitutional proceedings.
- h. **AN ORDER** restraining the Respondent from continuing with the purported inquiry for the removal of the Applicant as the Chief Justice of the Republic of Ghana in its current form, until it conforms to fair hearing guarantees.
- i. An award of USD 10 million as compensation for moral and reputational damages suffered by the Applicant as a result of her illegal suspension and unfair investigation.
- j. Any other relief(s) as the Honourable Court deems just.

Dated at Abuja this 30th day of June, 2025.




✓ FEMI FALANA, SAN
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