



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

WRIT ISSUED FROM ACCRA 2026

SUIT NO. 91/0867/2026

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

1. KWEKU AGYENIM BOATENG
10 BLOCK C
AGOGO KUMASI

PLAINTIFFS/APPLICANTS

2. SETH APPIAH RICHARD BROWN
29 MENSAH ANTEH AVENUE

VRS

1. KRISTO ASAFO MISSION OF GHANA
ADJACENT FBN BANK NSAWAM ROAD
ACHIMOTA

DEFENDANTS/RESPONDENTS

2. ISRAEL KWADWO SAFO
(NANA KWADWO SAFO AKOFENA)
ACCRA

3. FESTUS OWUSU BADU
ACCRA

4. DR. KWADWO ADDO ODURO
ACCRA

5. ROBERT NTIFUL
ACCRA

To

(defendants)

AN ACTION having been commenced against you by the issue of this writ by the above-named Plaintiffs.

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 19th day of June 2026

P. 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 defendants may appear hereto by filing a notice of appearance either personally or by a lawyer in Form 5 at the Registry of the Court of issue of the writ at High Court, Accra. A defendant appearing personally may, if he desires, give notice of appearance by post.

HIGH COURT ACCRA

STATEMENT OF CLAIM

The Plaintiff's claim is for:

- a. A declaration that the Constitution of The Kristo Asafo Mission of Ghana, established in 2017 and duly executed by the Council of Elders and the Amended Constitution as established in 2024, are the supreme laws governing the affairs of the Kristo Asafo Mission of Ghana.
- b. A declaration that the succession to the office of Leader of Kristo Asafo Mission of Ghana must be conducted strictly in accordance with the Constitution of the Church as established in 2017 and the Amended Constitution of the Kristo Asafo Mission as established in 2024.
- c. A declaration that, upon a true and proper meaning of Article 26(1)(a) of the Kristo Asafo Mission of Ghana as established in 2017 and Article 12(2)(a) of the Constitution of Kristo Asafo Mission of Ghana as amended in 2024, the 2nd Defendant is not qualified to be appointed, installed, presented or recognized as Leader of Kristo Asafo Mission of Ghana.
- d. An order directed at the 2nd Defendant not to hold himself out or allow himself to be held out or conduct any activity whatsoever as the head or leader of the Kristo Asafo Mission of Ghana.
- e. An order of perpetual injunction restraining the Defendants, the Council of Elders or any member of the Kristo Asafo Mission of Ghana, their agents, assigns, servants, privies, or howsoever described from appointing, installing, presenting, recognising, or holding out the 2nd Defendant as the Leader of Kristo Asafo Mission of Ghana.
- f. An order directing the Defendants to comply strictly with the provisions of the Constitution of the Kristo Asafo Mission of Ghana in relation to the succession to the office of Leader of the Kristo Asafo Mission of Ghana.
- g. Any further other orders that this Honourable Court may deem fit.
- h. Costs.

DATED AT NYAMEKYE & PARTNERS, PLOT NO. 3 & 5, OTINSHIE STREET, EAST LEGON, ACCRA-GHANA
THIS 17th DAY OF JUNE, 2026.



LAWYER FOR THE PLAINTIFFS
LIC NO. eGAR 00198/26
TIN: P0004038215
CHAMBER LIC NO. ePP00188/26

SYLVESTER NYAMEKYE, ESQ.
NYAMEKYE & PARTNERS
PLOT NO. 3 & 5 OTINSHIE
EAST LEGON -ACCRA, GHANA
TEL: 0270 682 979

This writ was issued by

whose address for service is
Agent for
Lawyer for the plaintiffs
ACCRA.....

PLAINTIFFS
DR. SYLVESTER NYAMEKYE, who resides at

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).

filed on 19-06-2026
at 11:00 am/pm
Registr...

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

SUIT NO: CJ/0864/2026

1. KWEKU AGYENIM BOATENG
10 BLOCK C
AGOGO KUMASI

PLAINTIFF/APPLICANT

2. SETH APPIAH RICHARD BROWN
29 MENSAH ANTEH AVENUE

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5. KRISTO ASAFO MISSION OF GHANA
ADJACENT FBN BANK NSAWAM ROAD
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DEFENDANTS/RESPONDENTS

6. ISRAEL KWADWO SAFO
(NANA KWADWO SAFO AKOFENA)
ACCRA

7. FESTUS OWUSU BADU
ACCRA

8. DR. KWADWO ADDO ODURO
ACCRA

5. ROBERT NTIFUL
ACCRA

STATEMENT OF CLAIM

1. The Plaintiffs have been prominent members of the Kristo Asafo Mission of Ghana (hereinafter referred to as the "church") for many years.
2. The 1st Plaintiff is the former Deputy General Secretary of the church.
3. The 2nd Plaintiff has been a member for over forty years and served as an appointed Executive Assistant to the leader of the church for four years.
4. The Plaintiffs have, over the years, assisted the Founder and Leader of the Church in propagating the mission and objectives of the Church.
5. The Plaintiffs bring this action for themselves as prominent members with profound in the church and on behalf of numerous concerned members of the Kristo Asafo Mission

of Ghana who have authorized and consented to the institution of this action in the interest of the Church.

6. The Kristo Asafo Mission of Ghana is governed by its Constitution established on 26th August 2017, as amended by the Kristo Asafo Mission of Ghana Constitution (Amendment, 2024), which constitutes the supreme governing instrument of the Church.
7. The Founder and Leader of the Church, Apostle Kwadwo Safo, passed away on or about September 2025.
8. Following the passing of the Founder, a dispute has arisen concerning the lawful succession to the office of Leader of the Kristo Asafo Mission of Ghana.
9. Under Article 26(1)(a) of the Constitution of the Church, a successor to the Leader is to be appointed within three clear calendar months after the death of the Leader.
10. Article 26(1)(a) further provides that only a male child of the Founder or a male child of a male child of the Founder may succeed to the office of Leader of the Church.
11. The Plaintiffs state that at one point during his lifetime, the Founder designated the 2nd Defendant as his successor pursuant to the Constitution then in force.
12. The Plaintiffs say that during the lifetime of the Founder, the Constitution of the Church was amended through the Kristo Asafo Mission of Ghana Constitution (Amendment, 2024).
13. The Plaintiffs contend that the effect of the 2024 Amendment was to remove the 2nd Defendant from the designated line of succession and thereby render him ineligible to assume the office of Leader of the Church.
14. The Plaintiffs further say that the 2024 Amendment represents the final and deliberate wishes of the Founder regarding succession to the leadership of the Church.
15. The Defendants have nevertheless sought and intend to install, present and announce or otherwise recognise the 2nd Defendant as the Leader of the Kristo Asafo Mission of Ghana.
16. The Plaintiffs are aware that the Defendants have planned a public ceremony for the installation and presentation of the 2nd Defendant as Leader of the Church.
17. The Plaintiffs say that any installation, recognition or presentation of the 2nd Defendant as Leader of the Church would be contrary to the Constitution of Kristo Asafo Mission of Ghana and therefore unlawful, null, void and of no effect.
18. The Plaintiffs further say that the intended installation of the 2nd Defendant has generated uncertainty, division and anxiety among members of the Church and threatens the unity and stability of the Church.
19. The Plaintiffs say that unless restrained by this Honourable Court, the Defendants will proceed with the installation of the 2nd Defendant and thereby undermine the constitutional governance structure of the Church.

20. The Plaintiffs therefore seek the intervention of this Honourable Court for declarations and consequential orders to preserve the constitutional order of the Kristo Asafo Mission of Ghana and ensure compliance with the Constitution of the Church.

WHEREFORE, the Plaintiffs claim against the Defendants jointly and severally as follows:

- a. A declaration that the Constitution of The Kristo Asafo Mission of Ghana, established in 2017 and duly executed by the Council of Elders and the Amended Constitution as established in 2024, are the supreme laws governing the affairs of the Kristo Asafo Mission of Ghana.
- b. A declaration that the succession to the office of Leader of Kristo Asafo Mission of Ghana must be conducted strictly in accordance with the Constitution of the Church as established in 2017 and the Amended Constitution of the Kristo Asafo Mission as established in 2024.
- c. A declaration that, upon a true and proper meaning of Article 26(1)(a) of the Kristo Asafo Mission of Ghana as established in 2017 and Article 12(2)(a) of the Constitution of Kristo Asafo Mission of Ghana as amended in 2024, the 2nd Defendant is not qualified to be appointed, installed, presented or recognized as Leader of Kristo Asafo Mission of Ghana.
- d. An order directed at the 2nd Defendant not to hold himself out or allow himself to be held out or conduct any activity whatsoever as the head or leader of the Kristo Asafo Mission of Ghana.
- e. An order of perpetual injunction restraining the Defendants, the Council of Elders or any member of the Kristo Asafo Mission of Ghana, their agents, assigns, servants, privies, or howsoever described from appointing, installing, presenting, recognising, or holding out the 2nd Defendant as the Leader of Kristo Asafo Mission of Ghana.
- f. An order directing the Defendants to comply strictly with the provisions of the Constitution of the Kristo Asafo Mission of Ghana in relation to the succession to the office of Leader of the Kristo Asafo Mission of Ghana.
- g. Any further other orders that this Honourable Court may deem fit.
- h. Costs.

DATED AT NYAMEKYE & PARTNERS, PLOT NO. 3 & 5, OTINSHIE STREET, EAST LEGON, ACCRA-GHANA THIS 17TH DAY OF JUNE, 2026.

entmfe

LAWYER FOR THE PLAINTIFF

LIC NO. eGAR 00198/26

TIN: P0004038215

CHAMBER LIC NO. ePP00188/26

**SYLVESTER NYAMEKYE, ESQ.
NYAMEKYE & PARTNERS
PLOT NO. 3 & 5 OTINSHIE
EAST LEGON -ACCRA, GHANA
TEL: 0279 682 979**

THE REGISTRAR
HIGH COURT
LAW COURT COMPLEX
ACCRA

AND A COPY FOR SERVICE ON THE ABOVE-NAMED DEFENDANTS OR THEIR
LAWYER.