



21<sup>ST</sup> JUNE, 2025.

23/6/25

**REPUBLIC OF GHANA  
IN THE GENERAL LEGAL COUNCIL  
IN THE MATTER OF A PETITION AGAINST LEGAL MISCONDUCT**

**BETWEEN:**

**NANA KWESI OSEI BONSU**

(Appellant and Principal Member of the Huahj Achama Tutuwaa Royal Family of Boadi, and Lawful Attorney of the Incapacitated Head of Family)

**...PETITIONER**

**AND**

**MUJEEB RAHMAN AHMAD, ESQ.**

(Moomin & Botta Solicitors, Kumasi, Ashanti Region. Lic No. eASH00029)

**...RESPONDENT**

**PETITION TO THE GENERAL LEGAL COUNCIL PURSUANT TO  
LEGAL PROFESSION ACT, 1960 (ACT 32)**

**SUBJECT: PETITION FOR DISCIPLINARY INQUIRY INTO BREACH OF  
LEGAL ETHICS, CONFLICT OF INTEREST, ABUSE OF CLIENT  
CONFIDENCE, AND PROFESSIONAL MISCONDUCT BY MUJEEB  
RAHMAN AHMAD, ESQ.**

**TO: The Secretariat**

General Legal Council

2nd Floor, Ghana Law School, Accra

**FROM:** Nana Osei Bonsu

(Appellant / Lawful Representative of the Huahi Achama Tutuwaa Royal Family of Boadi)

(Currently domiciled in the United States under humanitarian parole granted in 2023, with political asylum proceedings pending before the Immigration Court)

## **I. INTRODUCTION**

I, Nana Kwesi Osei Bonsu, the Petitioner herein, bring this formal petition pursuant to the Legal Profession Act, 1960 (Act 32), the Legal Profession (Professional Conduct and Etiquette) Rules, 1969 (L.I. 613), and the disciplinary authority vested in the General Legal Council, seeking an inquiry into the grave misconduct and ethical breaches committed by the Respondent, Mujeeb Rahman Ahmad, Esq., a practicing solicitor and advocate of the Superior Courts of Ghana.

This petition arises from the Respondent's flagrant and willful violation of core principles of legal ethics, including the sacred duty of client confidentiality, the prohibition against representing conflicting interests, and the obligation to avoid conduct likely to bring the legal profession into disrepute. Specifically, the Respondent—after having been consulted in confidence by me in a professional capacity and having rendered legal advice based on privileged information—subsequently acted in direct opposition to my interests in the same subject matter by representing an adverse party in a court proceeding rooted in the very facts, documentation, and legal context discussed during the prior consultation.

The Respondent's conduct, which includes the unauthorized use of confidential information, improper interference with judicial proceedings, misrepresentation of

his authority, and alleged collaboration with non-legal actors to intimidate and undermine my lawful rights, not only violates the foundational tenets of professional responsibility but also undermines public trust in the integrity of the Bar and the administration of justice in Ghana.

I submit this petition as a matter of professional accountability and public interest, with the aim of ensuring that no advocate of the Superior Courts is permitted to compromise the dignity and ethical integrity of the legal profession with impunity. I respectfully urge the General Legal Council to give this matter the serious attention it deserves and to initiate immediate disciplinary inquiry into the Respondent's conduct.

## **II. FACTUAL BACKGROUND**

1. On or about the 27th day of March 2021, I, Nana Kwesi Osei Bonsu, acting in my capacity as the lawful attorney for the Head of the Huahi Achama Tutuwaa Royal Family of Boadi, retained the legal services of Mujeeb Rahman Ahmad, Esq., the Respondent herein. The purpose of this engagement was to seek legal advice and representation in connection with the administrative execution of a judgment delivered in my favour by the High Court, Kumasi, in a land dispute involving family property. **(See Exhibit A)**
2. During this consultation, which occurred in confidence and in the expectation of professional discretion, I submitted to the Respondent a full complement of sensitive legal documents and evidence, including certified judgments, court processes, land search reports, and personal affidavits. The Respondent expressed willingness to act on my behalf and undertook to

provide legal representation in matters before the Lands Commission Secretariat, Kumasi, to facilitate the registration of title to the subject lands.

3. The relationship progressed over a considerable period during which the Respondent not only reviewed and studied my case in detail but also provided concrete legal opinions and recommendations. At no point did the Respondent disclose any potential or actual conflict of interest, nor did he recuse himself from the matter. To the contrary, he led me to reasonably believe that he was acting solely and faithfully in my best legal interest.
4. To my profound dismay, I later discovered that the same Respondent had, without my knowledge or consent, filed an application for substitution at the High Court, Kumasi, seeking to replace me—lawfully substituted as plaintiff after the death of my uncle—with a third-party individual unconnected to my family lineage. This application, filed after the trial court had become *functus officio*, was procedurally improper, factually misleading, and calculated to undermine a subsisting judgment in my favour.
5. The Respondent, with full knowledge of the legal and factual history of the case, misled the court and attempted to relitigate a matter already adjudicated, thereby frustrating post-judgment enforcement and subjecting me to prolonged and vexatious proceedings. His actions not only contravened the principle of finality in litigation but also grossly violated the professional obligation not to act against the interest of a former client in a related matter.
6. Matters further deteriorated on the 30th of August 2021, when the Respondent invited me to his chambers under the pretext of discussing the

pending motion. Present at that meeting was a legal officer from the Lands Commission. During the meeting, the Respondent brazenly attempted to coerce me to withdraw my opposition to his substitution application. He claimed that he was acting under the instructions of His Royal Majesty Otumfuo Osei Tutu II—then overseas in the United Kingdom—and that failure to comply would incur serious personal consequences. He stated, ominously, that “a fly that does not heed advice follows the corpse to the grave,” a threat clearly designed to instill fear and suppress my lawful claims. **(An evidence will be provided on or before the trial)**

7. Shockingly, on the same day, Ms. Rhodaline Amoah Darko, a Lands Commission officer who had earlier issued an official search report (Search Report No. KSI. 23/2021) affirming my family’s legal interest in the disputed land, was reported missing. Her disappearance remains unresolved, and its timing in relation to the threats I received and the ongoing land dispute raises alarming concerns about the safety of civil servants involved in land administration. **(See Exhibit B)**
  
8. Subsequently, the judgment granted in my favour by the High Court on 18th September 2021 was controversially set aside on 27th September 2021, despite the **pendency of an interlocutory appeal** challenging the Respondent’s earlier procedural misconduct. On the very day the judgment was overturned, I was arrested by officers of the Ghana Police Service, allegedly acting on complaints instigated by the Respondent and his affiliates at the Kumasi Traditional Council. I was held in police custody for six days, during which I was subjected to degrading treatment and psychological intimidation. I was charged with the criminal offence of

“selling land without title,” and although I was eventually acquitted and discharged after a full trial, the ordeal caused severe emotional and reputational harm. **(See Exhibit C)**

9. In response to my unlawful arrest and mistreatment, I filed a human rights suit (HR/0026/2022) against the Ghana Police Service. Judgment was entered in my favour by Her Ladyship Barbara Tetteh Charway, J., confirming the violation of my constitutional rights. However, no tangible enforcement or disciplinary measures were taken against the state actors involved, allegedly due to pressure and interference by the Manhyia Palace.
10. As a result of continued threats to my safety and liberty, I fled Ghana and currently reside in the United States under humanitarian protection granted in 2023. I remain under credible fear of persecution and torture pursuant to the United Nations Convention against Torture (UNCAT), and the Respondent’s unethical conduct forms part of the broader pattern of judicial abuse and institutional intimidation I have suffered. **(See Exhibit D)**

### **III. LEGAL GROUNDS FOR DISCIPLINARY ACTION**

The actions of the Respondent, Mujeeb Rahman Ahmad, Esq., constitute grave violations of the legal profession’s ethical and professional standards as set out under Ghanaian law, binding regulations of the General Legal Council, and universally accepted norms of legal practice. The following are the specific legal grounds on which disciplinary action is warranted:

1. **Conflict of Interest and Representation of Adverse Party (Rule 9 – Professional Conduct and Etiquette Rules, 1969)**

The Respondent, having been previously consulted by the Petitioner in a

confidential and professional capacity concerning the very same matter in which he later appeared for an adverse party, committed a fundamental breach of Rule 9 of the Legal Profession (Professional Conduct and Etiquette) Rules, 1969. This Rule expressly prohibits a lawyer from acting in a matter where there is a conflict of interest or from representing a party whose interest is adverse to that of a former client, particularly in matters arising from the same facts or transactions, without the client's informed and written consent.

In this case, the Respondent accepted instructions from a third party to file an application for substitution in a suit where he had already been privy to the Petitioner's legal strategy, documentation, and confidential discussions. This constitutes not only a professional conflict of interest but also a calculated attempt to subvert the due administration of justice.

**2. Breach of Confidentiality (Rule 10 – Professional Conduct and Etiquette Rules, 1969)**

Rule 10 provides that a lawyer shall not use, disclose, or act upon confidential information obtained from a client without the client's prior consent. The Respondent, after reviewing privileged material, including title documentation, search reports, judgment records, and instructions regarding enforcement of judgment, proceeded to act directly against the Petitioner in the same matter.

This act of using confidential information obtained in a fiduciary context to advance the interests of a rival party constitutes a flagrant breach of attorney-client privilege and severely undermines the public's trust in the legal profession. It also creates a chilling effect that discourages citizens from fully disclosing facts to their lawyers for fear of betrayal.

**3. Professional Misconduct and Abuse of Process (Section 19 – Legal Profession Act, 1960 [Act 32])**

Section 19(1) of Act 32 empowers the General Legal Council to discipline a lawyer who “has been guilty of grave misconduct in a professional respect.” The Respondent’s conduct in this matter—especially his forum shopping, abuse of the court’s processes, and filing of an application before a *functus officio* court—amounts to an intentional perversion of the course of justice and abuse of judicial machinery.

Additionally, by initiating frivolous applications aimed at reversing a lawfully obtained judgment, and using those proceedings as a pretext for coercion and intimidation, the Respondent has demonstrated a pattern of legal conduct incompatible with the honour and integrity of the legal profession.

**4. Threats, Coercion and Ethical Misconduct (Canon of Honourable Conduct – Ghana Bar Association)**

The Ghana Bar Association’s Code of Ethics enjoins every legal practitioner to act with independence, honesty, and fairness, and to uphold the dignity of the profession at all times. The Respondent’s conduct on 30th August 2021, wherein he threatened the Petitioner during a professional meeting, citing directives allegedly from His Royal Majesty and warning the Petitioner with fatalistic language, constitutes conduct unbecoming of a barrister.

Such threats, made in the presence of a Lands Commission officer and under the colour of authority, amount to undue influence, coercion, and abuse of client trust. These actions are not only unethical but also potentially criminal, and they undermine the sanctity of the lawyer-client relationship.

## **5. Dishonourable Conduct Causing Reputational Harm to the Profession**

The cumulative impact of the Respondent's unethical representation, betrayal of confidential information, manipulation of legal proceedings, and intimidation of the Petitioner has resulted in tangible personal harm, legal delay, and public scandal. His actions have directly contributed to the wrongful arrest, detention, and trial of the Petitioner, culminating in the latter's displacement from Ghana and pursuit of international protection. The legal profession must be insulated from individuals who use their position to advance vendettas, pursue political or traditional influence, or engage in acts that weaponize the judicial system against vulnerable parties. The Respondent's conduct, if left unpunished, would set a dangerous precedent and erode public confidence in lawyers and the justice system as a whole.

## **IV. PRAYER FOR RELIEF**

In view of the foregoing grave breaches of legal ethics, professional impropriety, and misconduct detailed herein, I, Nana Kwesi Osei Bonsu, humbly and respectfully pray that the General Legal Council exercises its full regulatory authority under the Legal Profession Act, 1960 (Act 32), and related ethical rules, to take decisive action in the interest of justice, accountability, and the dignity of the legal profession.

Accordingly, I respectfully request the Council to:

### **1. Commence Formal Disciplinary Proceedings**

Immediately initiate a disciplinary inquiry and formal proceedings against Mujeeb Rahman Ahmad, Esq., for professional misconduct, breach of client confidentiality, conflict of interest, and ethical violations under the Legal

Profession (Professional Conduct and Etiquette) Rules, 1969, and Section 19 of the Legal Profession Act, 1960 (Act 32).

**2. Suspend or Disbar the Respondent if Found Culpable**

Should the inquiry substantiate the misconduct alleged herein, impose appropriate disciplinary sanctions, including but not limited to temporary suspension or permanent removal (disbarment) of the Respondent from the Roll of Lawyers, to uphold the integrity of the Bar and protect future clients from similar harm.

**3. Issue a Public Reprimand or Advisory if Warranted**

Where the evidence supports misconduct but falls short of warranting disbarment, issue a written reprimand and/or public advisory outlining the ethical breach, serving as a deterrent to similarly situated practitioners and a reaffirmation of professional standards.

**4. Refer to the Attorney-General or Relevant Authority for Criminal Investigation**

Where applicable, refer the Respondent's conduct—particularly the threats, coercion, and complicity in the abuse of process—to the Attorney-General's Department, the Ghana Police Service, or other competent authority for investigation into possible criminal or contemptuous behaviour against the administration of justice.

**5. Provide Protective Guidance and Systemic Recommendations**

Issue guidance or policy recommendations to prevent future recurrence of such ethical violations, including:

- a. Procedures for screening potential conflicts of interest;
- b. Reinforcement of confidentiality protocols for former-client

representation; and

c. Advisory mechanisms for complainants to report threats, coercion, or abuse by legal practitioners.

**6. Acknowledge Receipt and Notify of Intended Steps**

Formally acknowledge receipt of this petition and inform the Petitioner in writing of the actions being taken, including timelines for investigation and hearing, as well as any preliminary inquiries or document requests.

**7. Permit Virtual Hearing or Sworn Affidavit**

Permit the Petitioner to present oral evidence or file a sworn affidavit, and/or provide access to supporting documents, including:

- a) The High Court judgment and subsequent setting aside order;
- b) The petitioner's application for title registration;
- c) Proof of the prior legal consultation with the Respondent;
- d) other relevant witnesses.

**8. Protect the Integrity of Judicial Institutions from Traditional or Political Interference**

The Council is urged to reinforce the autonomy of the legal profession by ensuring that no lawyer may lawfully rely on alleged instructions from traditional authorities, such as the Manhyaia Palace, to justify misconduct, threats, or improper legal action. Such behavior not only violates ethical duties but also threatens the independence of the Bar and the rule of law.

**V. CONCLUSION**

This petition is filed not merely to vindicate personal rights, but to protect the legal profession from reputational damage and to affirm that no legal practitioner,

regardless of influence or affiliations, is above the law. The Respondent's conduct, left unchecked, poses a continuing threat to clients, litigants, and the justice system.

I therefore respectfully submit this petition to the General Legal Council and trust that Your Honourable Office will treat it with the urgency, impartiality, and seriousness it deserves.

Respectfully submitted,



**Nana Kwesi Osei Bonsu**

(Appellant / Principal Member and Lawful representative of the Huahi Achama Tutuwaa Royal Family of Boadi)

United States Address:

**C/O Land Rights Defenders Inc.**

**846 Wilson Ave, Columbus, OH 43206**

**Email: mfgbonsu@gmail.com**

**Phone: +1 614-740-6668**

## **NOTARY ACKNOWLEDGMENT**

**A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.**

State of Ohio

County of Franklin

On June 21<sup>st</sup>, 2025 before me, Matthew Mayer, personally appeared

Nana osei Bansi, who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of Ohio that the foregoing paragraph is true and correct.  
WITNESS my hand and official seal.

Signature: 



"Exhibit A"

EXHIBIT "NANA 2"  
This is Exhibit Number  
Referred to in the Affidavit  
of  
[Signature]  
[Signature]

IN THE HIGH COURT  
LAND DIVISION  
KUMASI.

13/09/21  
10:21 AM  
REGISTRAR  
SUIT NO. CI/65/20

ABUSUAPANYIN KWAME KONADU YIADOM  
VERSUS

) PLAINTIFF  
FILED IN 1-6-2022  
1:48 PM  
) DEFENDANTS

- 1. YAW ACHEAMPONG
- 2. LANDS COMMISSION

AND

NANA AWUAH NIMFOUR II  
H/NO. PLOT I BOADI, KUMASI.

) APPLICANT

**AFFIDAVIT IN OPPOSITION OF PLAINTIFF  
TO MOTION FILED BY THE APPLICANT ON THE  
8<sup>TH</sup> OF SEPTEMBER, 2021**

I, NANA OSEI BONSU, of H/NO. OB 14 BOADI, KUMASI, BUSINESSMAN,  
make oath and say as follows:

- 1. That I am the deponent and plaintiff herein.
- 2. That my attention has been drawn to a motion filed by the Applicant on the 8<sup>th</sup> of September, 2021 and I am opposed to same.
- 3. That I will contend through Counsel that the Solicitor who filed the motion cannot purport to act for any person against me because on the 27<sup>th</sup> of March, 2021 I consulted him in respect of this very case.
- 4. That I repeat the immediately preceding paragraph and state that as a result of the said consultation the solicitor requested all my documents, extensively studied and perused same, gave the requisite advice and was due to represent me at Lands Commission Secretariat, Kumasi in respect of matters relating to administrative steps to perfect the title delivered in my favour by the High Court, Kumasi.

5. That these various steps recounted in the immediately preceding paragraph took place over a considerable period of time and to my utter surprise the same solicitor filed an application for substitution when the court had become functus officio trying to substitute another person with full knowledge of my own substitution for the original plaintiff and faced with insuperable legal obstacles, file the instant application with the sole aim of putting me to unnecessary and interminable legal proceedings. I annex a copy of the said motion as Exhibit 'A'.

6. That in the light of the abuse of process engaged in by the Applicant and his Counsel we are faced with the incongruous situation where there is a pending application by one and the same person for substitution as plaintiff and for setting aside the judgment in the very case.

7. That I am advised by Counsel and verily believe same to be true that the Honourable Court has a duty to ensure that its processes are not abused and that whenever the processes of the court are abused as in the instant case there is an inherent jurisdiction to stem the abuse of process.

8. That I will contend through Counsel that the motion is fundamentally-flawed contrary to settled legal principle and authority and ought to be dismissed at the threshold.

9. That I deny paragraphs 1, 2, 3, 4, 5, 6, 7, 8, 10, 11, 12, 13, 14, 15, 16, 17, 18, 20 and 21 of the affidavit in support of the application.

10. That I will contend through Counsel that the Applicant has no locus standi to make the instant application.

11. That I will again contend through Counsel that the application falls well short of the yardstick with which to set aside the judgment of a court of record more so when the Applicant has at all times material known of the pendency of the suit which resulted in the judgment. Indeed by his own showing in paragraphs 4 and 5 of the affidavit in support he knew of the suit even before the commencement of same thus making the instant application belated, tardy and mala fide.

Verily

12. That it is clear that the Applicant is abusing the processes of the Honourable Court which abuse ought to be halted in line with the court's duty to prevent multiplicity of applications aimed at unnecessary vexing me and my family unduly.

*Not in the order*

13. That the falsehood in the depositions purporting to support the affidavit is exposed by the fact that the Applicant claiming to be a member of the family in whose favour judgment has been entered is the self-same person seeking to set aside judgment in favour of the family he claims to belong.

14. That I am advised by Counsel and verily believe same to be true that it has never been the law that a person who cannot demonstrate any interest and who does not even know the capacity in which he is connected to the suit as evidenced by irreconcilably-divergent and inconsistent applications, would be permitted to set aside judgment entered a year ago when he had knowledge of the institution pendency and adjudication of the matter from the beginning.

15. That in SUIT NO C1/176/2021 ODEHYIE NANABA KWABENA BADU v. YAW AWUAH & 3 ORS pending before the High Court, Kumasi, the Applicant herein has been restrained from having any dealing with the land the subject matter of the suit in the present case. I annex the relevant writ as Exhibit "B" and order as Exhibit 'C'.

16. That the judgment of the Honourable Court dated 18<sup>th</sup> September, 2020 cannot be faulted in the manner the Applicant is seeking to do because the position of the law is that an admission requires no proof. The alleged error in the entry of judgment does not vitiate the judgment itself and can legitimately be corrected to reflect the judgment which is in line with the rules of court and fundamental legal principles.

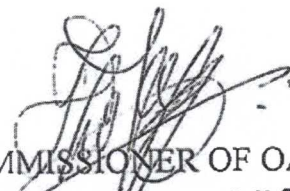
*Not in the order*

17. That I am advised by Counsel and verily believe same to be true that any process which is abusive of the processes of the court is a nullity and ought not be entertained.

18. Wherefore I swear to this affidavit in opposition to the application.

Sworn before me at Kumasi this 9th )  
day of September, 2021. )

  
DEPONENT

  
COMMISSIONER OF OATHS  
JOHN SAGOE  
COMMISSIONER FOR OATHS  
E. I. NO. 25-1994  
P. O. BOX 1733  
KUMASI-A.S.H.

THE REGISTRAR  
HIGH COURT  
LAND DIVISION, KUMASI.

AND TO THE 1<sup>ST</sup> DEFENDANT OR HIS SOLICITOR:  
NASHIRU YUSSIF ESQ  
GYEABOUR & CO CHAMBERS  
ACCRA.

AND TO THE 2<sup>ND</sup> DEFENDANT OR ITS SOLICITOR:  
NANA YAA ASANTE NNURO  
LANDS COMMISSION SECRETARIAT  
KUMASI.

AND TO THE APPLICANT OR HIS SOLICITOR:  
MUJEEB RAHMAN AHMED ESQ  
MOOMIN & BOTTA  
KUMASI.

"Exhibit B"



**LANDS COMMISSION**



ASHANTI REGION  
P. O. Box 43  
Kumasi, Ghana  
Tel: 03220 26492  
Fax: 03220 26492  
E-Mail: ashlandscom@gmail.com  
Web: www.landscommission.org

My Ref: S. 75687/

Your Ref:

29<sup>th</sup> JANUARY, 2021

**MR. BASHIRUDEEN BONSU**  
**P. O. BOX KS 85**  
**KASOA**

**KUMASI – PLOT OF LAND SHEWN EDGED PINK - BOADI**  
**(CERTIFICATE OF SEARCH NO. KSI. 239/2021)**

We write with reference to your letter dated 29<sup>th</sup> January, 2021 and wish to furnish you with particulars of records on the above-mentioned plot.

The plot falls on Stool land Part II and forms part of Judgement (Suit No. C1/65/2020) dated 18<sup>th</sup> September, 2020 granted by the High Court of Justice (Land Division) in favour of Abusuapanyin Kwame Konadu Yiadom suing for and on behalf of Huahi Achamaa Tutuwaa Royal Family of Boadi (Plaintiff) against Yaw Acheampong and Lands Commission (Defendants).

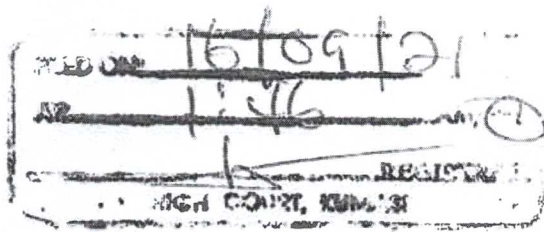
It was plotted on 18<sup>th</sup> January, 2021 under Property No. A. 8673 with Document No. ASH 63/01/2021.

It does not affect any other recorded transaction and the Planning Scheme of the area does not cover the subject plot.

**RHODALINE AMOAH-DARKO**  
**(LAND ADMN. OFFICER)**  
for: **REGIONAL LANDS OFFICER**

\*lob\*

“Exhibit C”



IN THE COURT OF APPEAL  
KUMASI.

SUIT NO. ....

ABUSUAPANYIN KWAME KONADU YIADOM )  
SUING FOR AND ON BEHALF OF ) PLAINTIFF/  
HUAHI ACHAAMA YIADOM ROYAL FAMILY ) APPELLANT  
OF BOADI SUBSTITUTED BY NANA OSEI BONSU  
HOUSE NO. 14, BOADI, KUMASI.

VERSUS

1. YAW ACHEAMPONG )  
2. LANDS COMMISSION ) DEFENDANTS

AND

NANA AWUAH NIMFOUR II )  
H/NO. PLOT I BOADI, KUMASI. ) RESPONDENT

**NOTICE OF INTERLOCUTORY APPEAL**

PLEASE TAKE NOTICE that the Plaintiff/Appellant herein dissatisfied with and aggrieved by the Ruling of the High Court, Kumasi, presided over by Justice Francis Obiri dated 16<sup>th</sup> September, 2021, do hereby appeal to the Court of Appeal, Kumasi, upon the grounds set forth in paragraph 3 below and will at the hearing of the appeal seek the reliefs set forth in paragraph 4 below.

2. **PART OF THE RULING COMPLAINED OF:**

The Ruling dismissing the legal objection to the withdrawal of the Applicant/Respondent's motion for substitution as plaintiff when there was a pending objection to same on Record which objection the Honourable Court was under a duty to rule upon as well as the failure of the Honourable Court to recognize that the simultaneous filing of an application to be substituted as Plaintiff and an application to set aside the judgment dated 18<sup>th</sup> September, 2020, in favour of the Plaintiff was an abuse of the process of Court by the Applicant/Respondent herein.

0712279  
16/09/21 - 20

3.  GROUNDS OF APPEAL

- a. In the light of the pending objection of Plaintiff/Appellant against the said motion for substitution by the Applicant/Respondent the ruling/order of the Honourable Court is subversive of the due and proper administration of justice and intrusive of the principle governing pending objections.
- b. The decision of the Honourable Court cannot be supported having regard to the facts and the law.
- c. The decision of the Honourable Court has no basis in law and has occasioned a substantial miscarriage of justice to the Plaintiff/Appellant whose iron-cast contention that the Applicant/Respondent was abusing the processes of court was thereby destroyed by the order of the Honourable Court.
- d. Assuming, without admitting, that the Honourable Court had a discretion in the matter, the discretion was not exercised in accordance with law and the reasons proffered for the exercise are completely misconceived.
- e. Additional grounds may be filed upon receipt of a certified true copy of the Ruling.

4.  NATURE OF RELIEF(S) SOUGHT

An order setting aside the ruling/order of the Honourable Court dated 16<sup>th</sup> September, 2021, and a further order that the Applicant/Respondent's conduct in filing an application to be substituted as Plaintiff and another application to set aside the judgment in favour of the Plaintiff is an abuse of the process of Court.

5.  NAME AND ADDRESS OF PERSON AFFECTED BY APPEAL

NANA AWUAH NIMFOUR II  
H/NO. PLOT I BOADI, KUMASI.

DATED AT KUMASI THIS 16<sup>TH</sup> DAY OF SEPTEMBER, 2021.

KWASI AFRIFA ESQ  
SOLICITOR'S LICENCE NO. GASH 01736  
O & A LEGAL CONSULT  
CHAMBERS REGISTRATION NO. ePP00070/21  
TIN PP0008672822  
SOLICITOR FOR PLAINTIFF/APPELLANT

THE REGISTRAR  
COURT OF APPEAL  
KUMASI.

**O & A LEGAL CONSULT  
BARRISTERS, SOLICITORS &  
NOTARIES PUBLIC  
P. O. BOX 6376  
H/No. NTER 301, AMAKOM**

THROUGH:  
THE REGISTRAR  
HIGH COURT  
KUMASI.

AND TO THE APPLICANT/RESPONDENT HEREIN.  
NANA AWUAH NIMFOUR II  
H/NO. PLOT I BOADI, KUMASI.

"Exhibit D"

10<sup>TH</sup> NOVEMBER 2023

THE REGISTRAR  
COURT OF APPEAL  
KUMASI-ASHANTI  
GHANA  
EMAIL: [appealregistryksi@jsg.gov.gh](mailto:appealregistryksi@jsg.gov.gh)



Dear Sir,

**IN THE MATTERS OF CIVIL APPEAL MOTION ENTITLED SUIT**

**NOS: H3/204/2023 & H3/217/2023**

**ABUSUAPANYIN KWAME KONADU YIADOM  
(SUBSTITUTED BY) NANA OSEI BONSU  
SUING FOR AND ON BEHALF OF HUAHI ACHAMA  
TUTUWAA ROYAL FAMILY (BOADI)**

**VRS**

- 1. YAW ACHEAMPONG**
- 2. LANDS COMMISSION**

**AND**

**NANA YAW AWUAH NIMFUO II**

**APPLICATION FOR ADJOURNMENT**

*please  
my lord,  
above submitted  
for your stn.  
13-11-2023*

I write as the Plaintiff herein, who is currently domiciled in the **United States 1279 POPLAR CREEK CT. BLACKLICK, 43004, OH** due to persecution and torture connected to the original suit that gave rise to the civil appeal motions titled above.

I recently learned the sudden demise of my lawyer **SAMMY AGBODO ESQ.** All attempts made to find a new lawyer in Kumasi for this case have proven futile.

In the light of this development, we would be very grateful if this case could be adjourned.

Thanks in anticipation.

Yours faithfully,

*[Handwritten signature]*  
NOTARY PUBLIC

*[Handwritten signature]*  
.....  
**NANA OSEI BONSU**



.....  
**THERESA WORKMAN**  
Notary Public, State of Ohio