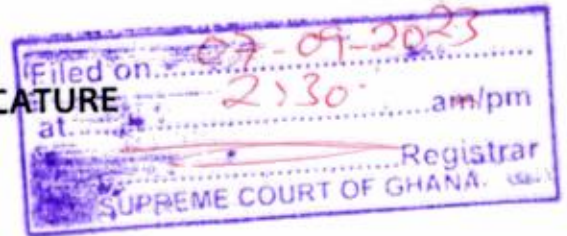


IN THE SUPERIOR COURT OF JUDICATURE
IN THE SUPREME COURT
ACCRA - A.D. 2023



**WRIT TO INVOKE THE ORIGINAL JURISDICTION OF THE SUPREME COURT
PURSUANT TO ARTICLES 2(1) AND 130(1) OF THE 1992 CONSTITUTION AND RULE
45(1) AND (2) OF THE SUPREME COURT RULES (1996) C.I 16**

SUIT NO.....

J1/22/2023

BETWEEN

1. **THE NATIONAL DEMOCRATIC CONGRESS (NDC)**
H/NO 12, ADAMA STREET
ADABRAKA, ACCRA
PLAINTIFFS
2. **CONVENTION PEOPLE'S PARTY(CPP)**
3. **ALL PEOPLE'S CONGRESS (APC)**
4. **LIBERAL PARTY OF GHANA(LPG)**
5. **GREAT CONSOLIDATED PEOPLE'S PARTY(GCPP)**

AND

ELECTORAL COMMISSION
HEAD OFFICE, 8TH AVENUE
RIDGE, ACCRA
DEFENDANT

IN THE NAME OF THE REPUBLIC OF GHANA, you are hereby commanded within fourteen (14) days after the service on you of the statement of the Plaintiffs' case inclusive of the day of service, that you are to file or cause to be filed for you a statement of the Defendant's case in an action at the suit of:

1. **THE NATIONAL DEMOCRATIC CONGRESS (NDC)**

2. CONVENTION PEOPLE'S PARTY(CPP)
3. ALL PEOPLE'S CONGRESS (APC)
4. LIBERAL PARTY OF GHANA(LPG)
5. GREAT CONSOLIDATED PEOPLE'S PARTY(GCPP)

The nature of the reliefs sought are as follows:

- A. *A declaration that upon a true and proper interpretation of Articles 42 and 45 (a) and (e) of the 1992 Constitution of the Republic of Ghana and Regulation 2 sub-regulation 2(a) and (b) and Regulation 30(1) of the Public Elections (Registration of Voters) Regulations 2016 – C.I 91 (as amended by C.I 126), the Electoral Commission of Ghana, the Defendant herein in registering voters, shall designate registration centres that are suitable and accessible to every eligible Ghanaian who is desirous of exercising his/her constitutional right to be registered as a voter;*
- B. *A declaration that on the strength of relief (a), the decision by the Electoral Commission of Ghana, the Defendant herein, to limit the 2023 continuous/limited registration of voters to its district offices as the designated registration centres instead of the electoral areas violates Articles 42 and 45 (a) and (e) of the 1992 Constitution of the Republic of Ghana read together with Regulation 2 sub-regulation 2(a) and (b) and Regulation 30(1) of the Public Elections (Registration of Voters) Regulations 2016 – C.I 91(as amended by CI 126) and is to that extent unconstitutional, null and void and of no legal effect;*
- C. *A declaration that upon a true and proper interpretation of articles 45(a), 45(e) and 42 of the Constitution, the decision of the 2nd Defendant to undertake the 2023 limited/continuous voter registration at the District Offices of the 2nd Defendant instead of undertaking same on the basis of electoral areas will result in voter suppression particularly in rural constituencies of the country, and*

is thus unconstitutional as it violates the rights of first-time voters to register and vote;

- D. *A declaration that the decision by the Electoral Commission of Ghana, the Defendant herein, to limit the 2023 continuous/limited registration of voters to its district offices as the designated registration centres instead of the electoral areas as required under Regulation 30(1) of CI 91 as amended by CI 126 violates Article 296(a) and (b) of the 1992 Constitution and is to that extent unconstitutional, null and void and of no legal effect;*
- E. *A declaration that the decision by the Electoral Commission of Ghana, the Defendant herein, to limit the 2023 continuous/limited registration of voters to its district offices as the designated registration centres instead of electoral areas as required under Regulation 30(1) of CI 91 as amended by CI 126 violates the right of prospective applicants to be registered as voters as stipulated in Article 42 of the 1992 Constitution of Ghana and is to that extent unconstitutional, null and void and of no legal effect;*
- F. *An Order directed at the Electoral Commission of Ghana, the Defendant herein to designate electoral areas in addition to its district offices as registration centres that are suitable and accessible to every Ghanaian who is desirous of exercising his/her constitutional right to be registered as a voter.*
- G. *Any other consequential orders the Court may deem meet.*

The Capacity in which the Plaintiffs are bringing this action is as follows:

The Plaintiffs bring this action in their capacity as registered political parties in Ghana for the enforcement of the provisions of the Constitution under Articles 2(1) (b) and 130(1) (a) thereof.

The address for service for the Plaintiffs is as follows:

NATIONAL DEMOCRATIC CONGRESS

H/NO 12, ADAMA STREET

ADABRAKA, ACCRA

The address for service of Counsel for the Plaintiff is as follows:

AYINE & PARTNERS, HSE. NO. C808/29

1ST CLOSE LILY STREET, EAST LEGON, ACCRA

The name and address of the person affected by this writ is as follows:

THE ELECTORAL COMMISSION, 8TH AVENUE RIDGE ACCRA.

DATED AT AYINE & PARTNERS, HSE. NO. C808/29 1ST CLOSE LILY STREET, EAST LEGON, ACCRA, PHONE NUMBER 0302542092/93, THIS 7TH DAY OF SEPTEMBER, 2023.



.....
GODWIN KUDZO TAMEKLO ESQ

LIN NO: eGAR 00174/23

LAWYER FOR THE PLAINTIFF

AND FOR SERVICE ON THE DEFENDANT, HEAD OFFICE, 8TH AVENUE RIDGE, ACCRA