



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



WRIT ISSUED FROM... ACCRA 10/11/ 2025

SUIT No

IN THE HIGH COURT OF JUSTICE
(GENERAL JURISDICTION)

51/0123/2026

STRATEGIC MOBILIZATION GHANA LIMITED

PLAINTIFF

No. 2 Master Barnor Street
Osu, Accra

VRS

THE OFFICE OF THE SPECIAL PROSECUTOR

DEFENDANT

No. 6 Haile Selassie Avenue
South Ridge, Accra

To

THE OFFICE OF THE SPECIAL PROSECUTOR

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

STRATEGIC MOBILIZATION GHANA LIMITED

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.

THE OFFICE OF THE SPECIAL PROSECUTOR

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

Dated this 10th day of

NOVEMBER

2025

Chief Justice of Ghana

P. BAFFOE-BONNIE
(AG. 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 filing a notice of appearance either personally or by a lawyer at Form 5 at the Registry of the Court of issue of the writ at A defendant appearing personally may, if he desire give notice of appearance by post.

*State name, place of residence or business address of plaintiff if known (not P.O. Box number).

**State name, place of residence or business address of defendant (not P.O. Box number).

FOR
M

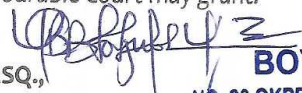
STATEMENT OF CLAIM

The Plaintiff claims against the Defendant the following reliefs:

- a) A declaration that the Defendant's detention of servers, san storage, SML Nova Mineral Analyzer, SML Nova Mineral Scale, CCTV systems, computers, laptops, external hard drives, mobile phones, printers belonging to the Plaintiff is unlawful.
- b) An order directing the Defendant to return the SML Nova Mineral Analyzer, SML Nova Mineral Scale, CCTV systems, computers, laptops, external hard drives, mobile phones, printers currently in the unlawful possession of the Defendant to the Plaintiff.
- c) An order directing the Defendant to pay to the Plaintiff special damages in the sum of Twenty-Eight Million Eight Hundred Fifty Thousand One Hundred Twenty-Five Dollars and Fifty Cents [GH¢28,850,125.50], being the cost of the servers, san storage, installation and reprogramming; all the 25 depots communication layers, transaction audit suite, petroleum upstream Supervisory Control and Data Acquisition (SCADA) system and solid minerals suite to the central server.
- d) General damages in the sum of Twenty Million Ghana Cedis [GH¢20,000,000.00] against the Defendant for the unlawful detention of the servers, san storage, SML Nova Mineral Analyzer, SML Nova Mineral Scale, CCTV systems, computers, laptops, external hard drives, mobile phones, printers belonging to the Plaintiff
- e) An order directing the Defendant to indemnify the Plaintiff against any liabilities from third parties on account of the Defendant's unlawful detention of its equipment.
- f) Costs, including legal fees on a full-indemnity basis
- g) Any other relief(s) as this Honourable Court may grant.

This writ was issued by
whose address for service is

CEPHAS BOYUO ESQ.,
No. 26 OKPELOR ABLORH SOWAH LP
WEST TRASSACO- ACCRA



BOYUO@LAW
NO. 26 OKPELOR ABLORH SOWAH LP
WEST TRASSACO - ACCRA
TEL: +233 256 556 556

Agent for

PLAINTIFF

Address Number and date of lawyer's current license: **eGAR00076/25**

Lawyer for the plaintiff **CEPHAS BOYUO ESQ.,** who resides at Accra

.....
Indorsement to be made within 3 days after service

This writ was served by me at
on the defendant

on the
endorsed the

day of
day of

Signed.....
Address.....

Filed on 10/11/25
at 10:42 am/pm
Registrar
GENERAL JURISDICTION LCC ACCRA

IN THE SUPERIOR COURT OF JUDICATURE
IN THE HIGH COURT OF JUSTICE
GENERAL JURISDICTION
ACCRA-A.D. 2025

SUIT NO.

STRATEGIC MOBILIZATION GHANA LIMITED

PLAINTIFF

No. 2 Master Barnor Street
Osu, Accra

vs

THE OFFICE OF THE SPECIAL PROSECUTOR

DEFENDANT

No. 6 Haile Selassie Avenue
South Ridge, Accra

STATEMENT OF CLAIM

1. Plaintiff is a limited liability company duly incorporated under the laws of the Republic of Ghana and in the business of providing end-to-end validation, data analysis, transaction tracking, revenue assurance, and real-time monitoring services across various sectors, including the transaction audit, petroleum upstream and downstream industry and the solid minerals sector.
2. Defendant is a statutory body established by the Office of the Special Prosecutor Act, 2017 (Act 959) as a specialized independent anti-corruption institution mandated to investigate and prosecute suspected corruption and corruption-related offences in the public and private sectors, on the authority of the Attorney General.
3. Plaintiff avers that it entered into a contract with the Ghana Revenue Authority (GRA) to provide various services, including but not limited to Transaction Audit, External Price Verification, and Real-Time Revenue Assurance Monitoring across the downstream petroleum sector, the upstream petroleum sector, and the solid minerals sector.
4. Plaintiff says that all investment cost, operational cost and incidental cost were borne wholly by the Plaintiff and zero exposure cost to the Ghana Revenue Authority (GRA)

5. Plaintiff avers that since the commencement of its work engagement with the Ghana Revenue Authority (GRA) from June 2018 to date; the Plaintiff has judiciously performed rightly and professionally all its obligations attributed to it under the contract. The Ghana Revenue Authority (GRA) on the other hand has over the years certified all performance reports prior to the payment of the Plaintiff's compensation as specified under the contract.
6. Plaintiff states that on 10th June 2025, the Defendant's officers entered its offices under a purported warrant and conducted a heavily militarized and intrusive search and seizure operation and took away the following;

	ITEM	QUANTITY
1	DELL Server	7
2	Hp All in One 24"	11
3	Hp All in One 27"	11
4	Lenovo Think Centre Neo 30A Gen3 27 AIO System	2
5	HP Server	5
6	HP EliteDesk 800 G2 SFF	2
7	HP ProDesk 400 G4 MT	3
8	Dell Inspiron 16	1
9	Hikvision NVR	2
10	HP Color Laserjet MFB M480	1
11	HP SAN Storage (FCLSE-0801 EU DoC-R23 MSA Storage)	2
12	Macbook Air	1
13	Durabook Tablet	1
14	Apple ipad	1
15	External Hard Drives	11
16	Dell Laptop	1
17	Hp Laptops	2
18	SML Nova Mineral Scale	5
19	SML Nova Mineral Analyzer	1
20	Dell XPS	1
21	Macbook Pro	1
22	Lenovo Laptop	1
23	Dell Durabook	1
24	SML Nova Mineral Scale Printers	3
25	SML Nova Mineral Analyzer Printer	1
26	Mobile Phone Infinix	1
27	Mobile Phone CAT	1

28	Pendrive	1
29	Dell All in One	1

forming the backbone of the nationwide petroleum monitoring system, transaction audit and solid minerals monitoring.

7. Plaintiff avers that its central server infrastructure contains uniquely engineered firmware and software designed to authenticate the operational technology (OT) devices at the Media Access Control (MAC) - address level, preventing unauthorized access, data manipulation, industrial espionage, and signal spoofing for downstream petroleum, upstream petroleum and solid minerals.
8. Plaintiff states further that these firmware, software and security configurations store depot-specific, gold sites, Floating Production Storage and Offloading (FPSO) and device identifiers tailored to each site stated. These components are not generic and cannot be replaced with off-the-shelf hardware, firmware and software.
9. Plaintiff avers that the seizure of the items listed in paragraph 6 caused immediate collapse of the secure communication chain linking all twenty-five (25) depots to the central data center, resulting in total cessation of real-time data flow.
10. Plaintiff further states that depot authentication protocols, FPSO sites and mining sites source-to-server communication layers, calibration libraries, and the proprietary firmware and software became permanently invalidated following the abrupt removals/uprooting and seizure, rendering the entire system inoperable.
11. Plaintiff avers that due to the bespoke nature of the firmware and software, the seized servers cannot be redeployed without triggering widespread authentication conflicts and system failure.
12. Plaintiff avers that, in order not to breach its contractual obligation with GRA, it immediately communicated to GRA on the system downtime as a result of the abrupt removal/uprooting and seizure of its computerized environment by the Defendant.
13. Plaintiff states that the Defendant unlawfully interfered with the Plaintiff's electronic records and computer systems in a manner that completely destroyed the integrity of national petroleum monitoring infrastructure, solid minerals monitoring and transaction audit.

14. Plaintiff states that the SCADA system deployed for national petroleum monitoring infrastructure, solid minerals monitoring and transaction audit qualifies as critical information infrastructure, and the Defendant's manner of uprooting the Plaintiff's SCADA system endangered national revenue systems without safeguards.
15. Plaintiff further avers that the Defendant unlawfully interfered with computer systems by taking both primary servers and backup servers without applying required technical and proportionality standards or preservation procedures.
16. Plaintiff states that investigative actions involving computerized systems are by law required to preserve system functionality and prevent data loss, however the Defendant's militarized actions caused a total system collapse.
17. Plaintiff states that the seizure of its computer data was not carried out by trained or qualified forensic personnel, contrary to the requirements that such operations must be done to minimize operational disruption and preserve electronic evidence.
18. Plaintiff avers that instead of conducting forensic imaging or cloning, which preserves business continuity, the Defendant forcibly uprooted physical hardware, destroying the Plaintiff's operational capacity nationwide.
19. Plaintiff states that the Defendant unlawfully accessed and uprooted systems containing business-sensitive, proprietary, and third-party protected data without implementing necessary safeguards.
20. Plaintiff avers that no measures were employed to prevent data breaches during the seizure, leading to exposure and corruption of protected information.
21. Plaintiff states that electronic evidence must be preserved with integrity, but the Defendant's militarized seizure including disabling CCTV and refusing oversight compromised chain of custody.
22. Plaintiff therefore reconstructed the entire technological environment, at a substantial cost of *Twenty-Eight Million Eight Hundred Fifty Thousand One Hundred Twenty-Five Dollars and Fifty Cents* [\$28,850,125.50].

i.	Cost of servers and firewall equipment	\$144,400.05
ii.	Software replacement and reprogramming	\$28,400,599.85
iii.	Installation and testing	\$200,125.60

iv.	Re-establishment of secure connectivity with client systems	\$105,000.00
	TOTAL	\$28,850,125.50

23. Plaintiff states that after the restoration of its operation as stated in the preceding paragraph, it performed and submitted all backlog reports to GRA.
24. Plaintiff avers that the Defendant's mishandling of the seized computerized environment including servers, firmware, firewalls, and *Supervisory Control and Data Acquisition* (SCADA) components violated both nationally and internationally recognized standards on chain-of-custody, forensic imaging, evidence preservation, and the handling of digital systems.
25. Plaintiff states that the seizure and handling procedures were not executed to preserve evidence but formed part of a preconceived plan to inflict operational harm, compromise proprietary systems, and destroy the Plaintiff's technical environment.
26. Plaintiff states that the Defendant's conduct was premeditated, as evidenced by the deliberate removal of the Plaintiff's CCTV system during the raid, a calculated act intended to eliminate video evidence of the unprofessional, unlawful, and irregular manner in which the operation was carried out.
27. Plaintiff contends that the conduct of the Defendant on 10th June 2025 amounts to unlawful seizure of property, abuse of statutory power, and a gross violation of the privacy rights of the Plaintiff.
28. **WHEREFORE, THE PLAINTIFF** claims against the Defendant as follows:
- A declaration that the Defendant's detention of servers, san storage, SML Nova Mineral Analyzer, SML Nova Mineral Scale, CCTV systems, computers, laptops, external hard drives, mobile phones, printers belonging to the Plaintiff is unlawful.*
 - An order directing the Defendant to return the SML Nova Mineral Analyzer, SML Nova Mineral Scale, CCTV systems, computers, laptops, external hard drives, mobile phones, printers currently in the unlawful possession of the Defendant to the Plaintiff.*
 - An order directing the Defendant to pay to the Plaintiff special damages in the sum of Twenty-Eight Million Eight Hundred Fifty*

Thousand One Hundred Twenty-Five Dollars and Fifty Cents [\$28,850,125.50], being the cost of the servers, san storage, installation and reprogramming; all the 25 depots communication layers, transaction audit suite, petroleum upstream Supervisory Control and Data Acquisition (SCADA) system and solid minerals suite to the central server.

- d) General damages in the sum of Twenty Million Ghana Cedis [GH¢20,000,000.00] against the Defendant for the unlawful detention of the servers, san storage, SML Nova Mineral Analyzer, SML Nova Mineral Scale, CCTV systems, computers, laptops, external hard drives, mobile phones, printers belonging to the Plaintiff
- e) An order directing the Defendant to indemnify the Plaintiff against any liabilities from third parties on account of the Defendant's unlawful detention of its equipment.
- f) Costs, including legal fees on a full-indemnity basis
- g) Any other relief(s) as this Honourable Court may grant.

DATED AT BOYUO@LAW, NO. 26, OKPELOR ABLORH SOWAH LP, WEST TRASACCO, ACCRA
THIS 10TH DAY OF NOVEMBER 2025.

BOYUO@LAW 
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WEST TRASACCO - ACCRA
TEL: +233 256 550 550
EPHAS BOYUO, ESQ
SOLICITOR FOR PLAINTIFF
LICENCE NO.: eGAR00076/25
CHAMBER LICENCE NO.: ePP009345/24
TIN: P0001440217
BP NO.: 3000061054

THE REGISTRAR
HIGH COURT
GENERAL JURISDICTION
ACCRA

AND FOR SERVICE ON THE ABOVE-NAMED DEFENDANT.