

Filed on 21/03/2024
at 3:00 am/pm
Amu Registrar

IN THE SUPERIOR COURT OF JUDICATURE
IN THE HIGH COURT OF JUSTICE
ACCRA- A.D. 2024

SUIT NO: HR/0089/2024

IN THE MATTER OF AN APPLICATION UNDER ARTICLE 33 OF THE 1992
CONSTITUTION OF GHANA AND ORDER 67 OF THE HIGH COURT (CIVIL
PROCEDURE) RULES, 2004 (CI 47)

BETWEEN

DEMOCRACY HUB 1ST APPLICANT
Co. Reg. No.: CG225551021
Hse No 195/10, Otinkorang Street Kaneshie, Accra.
GA-260-1118

OTHER APPLICANTS 2nd to 34TH APPLICANTS
(Refer to Annexure A)

AND

THE INSPECTOR GENERAL OF POLICE 1ST RESPONDENT
Police Headquarters
Cantonment, Accra.

THE ATTORNEY-GENERAL 2ND RESPONDENT
Attorney General's Department
Ministries, Accra.

ORIGINATING MOTION ON NOTICE FOR THE ENFORCEMENT OF THE
APPLICANTS' FUNDAMENTAL HUMAN RIGHTS TO PERSONAL LIBERTY,
TO ASSEMBLY, TO FREEDOM AGAINST TORTURE, TO FREEDOM OF
MOVEMENT, ADMINISTRATIVE JUSTICE, FREEDOM FROM CRUEL AND
INHUMANE OR DEGRADING TREATMENT, AND FREEDOM OF
ASSOCIATION

TAKE NOTICE that pursuant to the provisions of article 33 of the 1992
Constitution and Order 67 of the High Court (Civil Procedure) Rules,

2004(C.I 47), this Court will be moved on the day of at o'clock
in the forenoon or so thereafter as Counsel for and on behalf of the
Applicant herein, praying the Court to, on the ground set forth in the
accompanying affidavit,

1. Adjudge and declare as follows:

- I. That by publishing the notice (Exhibit DH4) on September 20, 2023, seeking to proscribe the OccupyJulorbiHouse Protest, the Police violated the Applicants' rights to administrative justice and freedom of assembly.
- II. That by arresting, detaining, stripping, and subjecting the Applicants to beatings and other harsh and severe physical and verbal abuse on September 21, 2023, the Respondents have violated the rights of the Applicants to personal liberty, fair trial, and freedom from cruel, inhuman, or degrading treatment and punishment.
- III. That by demanding and ensuring that the Applicants are stripped half naked before being put behind the cells, the Respondents have violated the rights of the Applicants to human dignity and freedom from cruel, inhuman, and degrading treatment.

IV. That by preventing the Applicants on September 21, 2023, from embarking on the OccupyJulorbiHouse Protest, the Respondents have violated their rights to administrative justice, freedom of assembly, freedom of association, and freedom of movement.

2. Make an order for special damages of:

- I. Sixty-five thousand and four hundred and thirty cedis (GHC 65,430.00) being the value of the equipment, materials, and other resources of the 1st Applicant that were destroyed or wasted as a result of the police activities regarding the Occupy Julorbi House Protest on September 21, 2023.
- II. Five Thousand Ghana cedis only (GHC 1,500.00) being monies unlawfully collected from the Applicants while detained.

3. Make an order for general damages, jointly or severally, against the Respondents.

4. Make an order of cost (including the cost of legal services) and

5. Any other remedies that this honorable Court may deem fit.



COURT TO BE MOVED on the 4th day of APRIL 2024 at 9 O'clock in the forenoon or so soon thereafter as Counsel for and on behalf of the Applicant may be heard.

DATED THIS

DAY of

2024



JAMALDEEN TONZUA

Merton & Everett LLP

Chamber Registration No: ePP00812/23

Partnership TIN: C0063476185

Solicitors License No: eGAR01293/24

Solicitors BP Number: 3000079557

Solicitor for the Applicants

TO:
The Registrar
High Court
Accra.

AND FOR SERVICE ON:

The **INSPECTOR-GENERAL OF POLICE**, whose address of service is Ghana Police Headquarters, Cantonment, Accra.

The **ATTORNEY GENERAL's address of service** is the Attorney General's Department, Ministries, Accra.

Filed on 21/03/2024
at 3:00 am/pm
Registrar
HIGH COURT, ACCRA

IN THE SUPERIOR COURT OF JUDICATURE
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DEMOCRACY HUB

1ST APPLICANT

Co. Reg. No.: CG225551021

Hse No 195/10, Otinkorang Street Kaneshie, Accra.

GA-260-1118

OTHER APPLICANTS

2ND to 34TH APPLICANTS

(Refer to Annexure A)

AND

THE INSPECTOR-GENERAL OF POLICE

1ST RESPONDENT

Police Headquarters

Cantonment, Accra.

THE ATTORNEY-GENERAL

2ND RESPONDENT

Attorney General's Department

Ministries, Accra.

AFFIDAVIT IN SUPPORT OF ORIGINATING MOTION ON NOTICE FOR THE
ENFORCEMENT OF THE APPLICANTS' FUNDAMENTAL HUMAN RIGHTS
TO PERSONAL LIBERTY, TO ASSEMBLY, TO FREEDOM AGAINST
TORTURE, TO FREEDOM OF MOVEMENT, ADMINISTRATIVE JUSTICE,
FREEDOM FROM CRUEL AND INHUMANE OR DEGRADING TREATMENT;
AND FREEDOM OF ASSOCIATION

I, BENJAMIN AKUFFO DARKO, social worker of Marlejour, GD-320-7226, in the Greater Accra Region of Ghana, do hereby make an oath and say as follows:

1. That I am the deponent, the 2nd Applicant herein, a director at the 1st Applicant company, and convener of the Occupy Julorbi House Protest, by which capacity I have the consent of the 1st Applicant and the other Applicants herein to depose to this Affidavit jointly for myself and on behalf of all the other Applicants.
2. That the facts deposed to herein are matters within my personal knowledge, information, and belief.
3. That at the hearing of this application, my counsel shall seek the leave of this Honorable Court to refer to all the processes filed in this matter as if the same were set out *in extenso* herein and sworn to on oath.
4. That the 1st Respondent, the head of the Ghana Police Service (the Police), is the person who is responsible for the Police's operational control and administration, and on whose behalf the police officers whose actions are the subject matter of this motion acted or purported to have acted in respect of me and the other Applicants.
5. That the 2nd Respondent is the principal legal advisor to the government (including the Police) and the person against whom all proceedings against the Police may be brought.
6. That by a letter dated August 21, 2023, the 1st Applicant notified the Greater Accra regional command of the Police of

its plan to embark on a public demonstration, which they named and styled "OccupyJulorbiHouse" Protest.

Particulars Of the Protest Plan

- a. **Nature of Protest:** Procession and Picketing
- b. **Dates:** Thursday, September 21, through to Saturday, September 23, 2023.
- c. **Place of Convergence:** 37 Trotro Station, Accra
- d. **Route:** The Liberation Road, Accra
- e. **Destination:** The forecourt of Jubilee House, Off the Liberation Road.
- f. **Expected Number of Protesters:** Twenty thousand people (20,000).
- g. **Time:** The protest march will begin at 10 am, and the event will close at 5 pm.

It is attached and marked as Exhibit DH1, a copy of the said protest notification letter.

7. That on September 1, 2023, the Police had a meeting with us—the officials of the 1st Applicant and conveners— at which the plans and modalities of the OccupyJulorbiHouse Protest were discussed.
8. That by a letter dated 4 September 2023, and after considering the demands the Police raised at the September 1, 2023,

meeting being a change of location considering the traffic conditions on the road leading to the Flagstaff House, the 1st Applicant notified the Greater Accra Regional command of the Police of a revised protest plan.

Particulars of the Protest Plan

- a. **Nature of Protest:** Picketing only.
- b. **Dates:** Thursday, September 21, through to Saturday, September 23, 2023
- c. **Place:** Forecourt of the Jubilee House, off the Liberation Road, Accra.
- d. **Expected Number of Protesters:** Twenty thousand people (20,000)
- e. **Time:** Picketing will start at 6 am and end at 9 pm.

Attached and marked as **Exhibit DH2** is a copy of the said revised notification letter.

9. That the 1st Applicant had relied on the arrangements they had with the Police to expend time, money, and effort in procuring the equipment, materials, and other resources for the purpose of the OccupyJulorbiHouse protest.

Particulars of Procured Items and Expenses:

- a. That five hundred cedis (Ghc 500.00) only paid for photography.
- b. That one thousand and five hundred cedis (Ghc 1500.00) was spent on the rental of a Truck.
- c. That eight hundred and fifty cedis (Ghc 850.00) was spent on the PA system and Generator Rentals.
- d. That one thousand and six hundred cedis (Ghc 1600.00) was spent on fuel for the Generator and the truck.
- e. That five thousand cedis only (Ghc 5000.00) was spent on transporting protesters from Kumasi to Accra.
- f. That six thousand cedis only (Ghc 6000.00) was spent on transporting protesters from Takoradi to Accra.
- g. That two thousand and two hundred and eighty cedis only (Ghc 2280.00) was spent transporting protesters from Tamale to Accra.
- h. That four hundred cedis only (Ghc 400.00) was spent on buying Ghana flags to be used by demonstrators.
- i. That five thousand and eight hundred and eighty cedis (Ghc 5880.00) was spent on food, water, and medication for the arrested protesters.

- j. That one thousand cedis (Ghc 1000.00) was spent on transport by the media engagement team.
- k. That two thousand and five hundred cedis (Ghc 2500.00) was spent as fuel for vehicles used to commute from one police station to the other.
- l. That one thousand and four hundred cedis (1400.00) was spent on food and water for Marshalls.
- m. That seven thousand and six hundred cedis (Ghc 7600.00) was spent on designing T-shirts for the protest.
- n. That three thousand and nine hundred and twenty cedis (Ghc 3920.00) was spent as transport costs to return arrested persons to their destination.
- o. That twenty-five thousand cedis (Ghc 25,000.00) was spent as vehicular cost to convey persons from vantage points to the protest ground.

Attached and marked as **Exhibit DH3** is the 1st Applicant's revenue and expenditure statement for the protest.

- 10. That the 1st Applicant did not receive any communication from the Police until the evening of **September 20, 2023** (the eve of the scheduled Occupy Julorbi House Protest), when the Police published a notice on social media in which they claimed that they

had filed an application in a court to prevent the Occupy Julorbi House Protest from happening on the scheduled dates.

Attached and marked as Exhibit DH4 is a copy of the Police public notice dated **September 20, 2023**

11. That assuming (without admitting) that they truly filed an application in the courts to prevent us from embarking on the OccupyJulorbiHouse Protest, by filing such an application or seeking to notify the public of it a few hours before the protest, the Police have acted unreasonably and unfairly since they had notice of the protest at least a month to the date of the protest.
12. That I am advised by Counsel, and I verily believe the same to be true, that by publishing the notice in Exhibit DH4 at the time and in the manner they did, the Police have violated my right and the rights of the other Applicants to administrative justice and freedom of assembly.
13. That on the morning of 21 September 2023, on the agreed time for the commencement of the OccupyJulorbiHouse Protest, I and the other Applicants arrived at the 37 Trotro Station at around 7:30 a.m. and began to make our way to the forecourt of the Jubilee House the picketing location, only to be confronted by several dozens of heavily armed police officers in uniform.
14. That without any information or discussion whatsoever, the police officers pounced on us, wrestled as many persons (including passers-by) as they could to the ground, and – amidst jostling, truncheoning, and hand blows to several parts of our bodies and

other forms of physical and verbal abuses – began to forcibly throw us into several buses which were parked nearby.

Attached and marked as **Exhibit DH5** is a video copy of the incident on the bus described above.

15. That as a result of wrestling us down to the ground, jostling, and heavy fist blows which the police officers administered to us, several of us – the Applicants and other protesters – suffered several degrees of physical injury.

Particulars of injury to Applicants

- a. Amelia Amedela Amemate, the 24th Applicant, suffered injuries, including injury to her arm caused by a metal bar used by a police officer in plain uniform to hit her.
16. That upon the unlawful arrest, the police drove us in buses and trucks to various unknown places and, eventually, brought us to the premises of the Regional Police Command
 17. That on arriving at the Police station, we were, with physical assault and abuse, forced into a room where heavily built men, wearing earrings and of unkempt dispoession numbering about ten(10) were unleashed on us by the Police to attack us; and that they repeatedly beat us, choked us, and continuously threatened to kill us.

Particulars of Assault.

- a. The Applicants were pushed, bullied, and forced into a holding room.

- b. Applicants were threatened to suffer unlawful harm and abuse if they failed to comply with the directive of the police officers to sit on the floor.
 - c. The 13th Applicant was physically assaulted and beaten in the holding room for being identified as the leader of the protesters.
18. That after about two (2) hours of subjecting us to beatings, the police drove us in the buses and trucks to various unknown places and, eventually, threw several of us – the Applicants and other protesters – into several police cells across the city of Accra, where they detained us amidst sustained severe physical and verbal abuse.

Particulars of the Verbal Abuse

- a. That the Applicants are children of animals who deserve no respect.
 - b. That the Applicants are evil people who wish to embarrass and make the government look bad.
 - c. That the Applicants are a bunch of imbeciles.
 - d. That the Applicants are hooligans who wish to destabilize the country.
 - e. That the Applicants are a bunch of lazy drug addicts who are doing the bidding of opposition political parties.
19. That at the various police cells, I and the other Applicants were forcefully stripped half-naked before we were detained at the police

cells, and this treatment is inhumane and offends our constitutionally guaranteed right to human dignity.

Particulars of Persons held at the various cells.

A. Railways Police Station

- I. Oliver Barker-Vormawor

B. Shukura Police Station

- I. Yunus Koray
- II. Kwame Opoku
- III. Kwasitsu Wohorm
- IV. Mawunyo Kojo Amata
- V. Divine Agbenyo
- VI. Frank Mensah
- VII. Michael Amofa
- VIII. Daniel Duncan Bodjona

C. Dansoman Police Station

- I. Nii Quaye Manu
- II. Nurudeen Ibrahim
- III. Adams Hamid
- IV. Rasheed Ali
- V. Joseph Tiibe

D. Bravo SWAT Cell

- I. Raphael Afful Williams
- II. Kelvin Nana Boakye

- III. David Kekesi
- IV. Kevin Mawunyega
- V. Amakye Patrick
- VI. Felix Donkor
- VII. Eugene Ashatey
- VIII. Mark Aryee

E. Accra Central Police Station

- I. Benjamin Akuffo Darko
- II. Selikem Timothy Donkor
- III. Wise Worlali
- IV. Albert Tetteh
- V. Emmanuel Osei-Kwame Bonsu
- VI. Frederick Adongo
- VII. Kirchuffs Atengble

F. Adabraka Police Station

- I. Yao Dzeketey
- II. Ewoenam Akahoho
- III. Richard Ajao
- IV. Albert Akwasi Owusu

G. Korle-Bu Police Station

- I. David Derah Eberechukwu
- II. William Jirakor
- III. Samuel Gyamfi-Bonsu
- IV. Amemate Leo Atsu
- V. Prince Aful

H. Ministries Police Station

- I. Darlington Desmond Okunor
- II. Fidel Agagle
- III. Mabel Benewaa Tawiah
- IV. Samira Abdullah
- V. Jerry Aidoo
- VI. Delali Adorglah Bissa
- VII. Rexford Ativor

I. Chokor Police Station

- I. Amelia Amedela Amemate
- II. Belinda Osei Mensah
- III. Bubu Sedanu

20. That while in detention at the cells, the Police exposed me and the other Applicants to extortion. That sums of money ranging from two hundred Ghana cedis (Ghc 200.00) to one thousand Ghana cedis (Ghc 1000.00) was unlawfully demanded and forcefully collected by inmates in the cells from the Applicants while the Police ignored, tolerated, supervised, and supported these acts of extortion.

Particulars of monies extorted.

1. Eight hundred Ghana cedis (Ghc 800.00) taken from the 15th Applicant.
2. Five hundred Ghana cedis (Ghc 500.00) taken from the 22nd Applicant.
3. Two hundred Ghana cedis (Ghc 200.00) taken from the 23rd Applicant.

21. That the Police continued to administer harsh and severe physical and verbal abuse to us throughout the day until about 9 o'clock in the evening, the same day when they (the Police) began to release us in batches from the various police detention centers and cells.
22. That I am advised by counsel, and I verily believe the same to be true, that by the arrest, detention without access to counsel, the forceful half-naked stripping, and the above-mentioned harsh and severe physical and verbal abuse which they administered to me, the other Applicants, and other protesters, the Respondents have violated my right and the right of the other Applicants to personal liberty, fair trial, freedom from cruel, inhumane and degrading treatment and punishment and, human dignity.
23. That I am, again, advised by counsel and verily believe the same to be true that having duly notified the Police of the OccupyJulorbiHouse Protest, it is only a court of competent jurisdiction (not the Police) which may, by an express order, prohibit us the protesters – from embarking on the protest.
24. That I am further advised by counsel, and I verily believe the same to be true, that by preventing me and the other Applicants and other protesters from embarking on the OccupyJulorbiHouse Protest of which the Police were duly notified, the Respondents have violated my right and the right of the other Applicants to administrative justice, freedom of assembly, freedom of association, and freedom of movement.

25. That, finally, I am advised by counsel, and I verily believe the same to be true, that this is a proper case where this court ought to exercise its jurisdiction to:

a. Adjudge and declare as follows:

- I. That by publishing the notice (Exhibit DH4) on September 20, 2023, seeking to proscribe the OccupyJulorbiHouse Protest, the Police violated the Applicants' rights to administrative justice and freedom of assembly.
- II. That by arresting, detaining, stripping, and subjecting the Applicants to beatings and other harsh and severe physical and verbal abuse on September 21, 2023, the Respondents have violated the rights of the Applicants to personal liberty, fair trial, and freedom from cruel, inhumane, or degrading treatment and punishment.
- III. That by demanding and ensuring that the Applicants are stripped half naked before being put behind the cells, the Respondents have violated the rights of the Applicants to human dignity and freedom from cruel, inhumane, and degrading treatment.
- IV. That by preventing the Applicants on September 21, 2023, from embarking on the OccupyJulorbiHouse Protest, the Respondents

have violated their rights to administrative justice, freedom of assembly, freedom of association, and freedom of movement.

- b. Make an order for special damages of:
 - I. Sixty-five thousand and four hundred and thirty cedis (GHC 65,430.00) being the value of the equipment, materials, and other resources of the 1st Applicant that were destroyed or wasted as a result of the police activities regarding the Occupy Julorbi House Protest on September 21, 2023.
 - II. Five Thousand Ghana cedis only (GHC 1,500.00) being monies unlawfully collected from the Applicants while detained.
6. Make an order for general damages, jointly or severally, against the Respondents.
7. Make an order of cost (including the cost of legal services) and
8. Provide any other remedies that this honorable Court may deem fit.

WHEREFORE, I swear to this affidavit in support of the motion.

SWORN AT ACCRA THIS 25th DAY OF MARCH 2024



DEPONENT

SAMUEL KPAKPO ADDO
COMMISSIONER FOR OATHS
BEFORE ME
705 ...
MAMPROBI-ACCRA
TEL: 011-7780004
02485530

COMMISSIONER FOR OATHS

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Amma Registrar
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Co. Reg. No.: CG225551021

Hse No 195/10, Otinkorang Street Kaneshie, Accra.

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OTHER APPLICANTS

2nd to 34th APPLICANTS

(Refer to Annexure A)

AND

THE INSPECTOR GENERAL OF POLICE

1ST RESPONDENT

Police Headquarters
Cantonment, Accra.

THE ATTORNEY-GENERAL

2ND RESPONDENT

Attorney General's Department
Ministries, Accra.

CERTIFICATE OF EXHIBITS

I, Samuel Kpakpo Adbo Commissioner for
Oaths/Magistrate/Registrar of Court/Notary, do hereby certify that the
following documents have been attached to the Applicant's Affidavit in

support of the Motion on Notice for an Order to Disjoin the Plaintiff and exhibited before me.

No.	EXHIBIT MARK	DESCRIPTION
1	Exhibit DH1	A copy of the Occupy Juloorbi Protest notification letter.
2	Exhibit DH2	A copy of the revised Occupy Juloorbi Protest notification letter.
3	Exhibit DH3	1 st Applicant's revenue and expenditure statement for the protest.
4	Exhibit DH4	A copy of the Police public notice dated September 20, 2023.
5	Exhibit DH5	A video copy of the 21 st of September incident in the bus.

SAMUEL KPAKPO ADDO
COMMISSIONER FOR OATHS
BEFORE ME
MAMFRIBI-41004
TEL: 012 7780004
COMMISSIONER FOR OATHS

ANNEXURE A: LIST OF APPLICANTS

1. DEMOCRACY HUB, 1ST APPLICANT
2. BENJAMIN AKUFFO DARKO, 2ND APPLICANT
3. BENTIL CONSTANT AMEMATE, 3RD APPLICANT
4. KWABENA SAMUEL GYAMFI-BONSU, 4TH APPLICANT
5. ATSU LEO AMEMATE, 5TH APPLICANT
6. SELIKEM TIMOTHY DONKOR, 6TH APPLICANT
7. MAWULI ALBERT TETTEH, 7TH APPLICANT
8. FREDERICK ADONGO, 8TH APPLICANT
9. KOJO MAWUNYO AMATA, 9TH APPLICANT
10. KEKELI YAO GILBERT DZEKETEY, 10TH APPLICANT
11. KOJO MAWUNYO AMATA, 11TH APPLICANT
12. WOHORM KWASITSU, 12TH APPLICANT
13. OLIVER BARKER-VORMAWOR, 13TH APPLICANT
14. RAPHAEL AFFUL WILLIAMS, 14TH APPLICANT
15. MABEL BENEWAA TAWIAH, 15TH APPLICANT
16. CYRIL EDEM ASSEM, 16TH APPLICANT
17. REXFORD ETSEY ATIVOR, 17TH APPLICANT
18. MARK ARYEE, 18TH APPLICANT
19. OWUSU ALBERT BOADU, 19TH APPLICANT
20. DAVID DERAH EBERECHUKWU, 20TH APPLICANT
21. RICHARD AJAO, 21ST APPLICANT
22. FIDEL AGAGLE, 22ND APPLICANT
23. BOAKYE KELVIN, 23RD APPLICANT
24. AMELIA AMEDELA AMEMATE, 24TH APPLICANT

EXHIBIT DHA



DEMOCRACY HUB

Monday August 21, 2023
the documents referred to the Office of B.A. Danfo and marked DHA
Accra this 21st day of August 2023
before me.

Accra Regional Police Headquarters
Ghana Police Service
Accra,

Dear Commander,

NOTICE OF INTENTION TO EXERCISE CONSTITUTIONAL RIGHT UNDER ARTICLE 21(1)(d) and (e) OF THE 1992 CONSTITUTION

We, Democracy Hub, a civil society organization based in Accra, write with reference to Section 1 of the Public Order Act (Act 491), which provides that any person who desires to hold any special event within the meaning of that Act in any public place shall notify the Police of their intention not less than 5 days before the date of the special event. Pursuant to this, we wish to notify you that:

- a) **Purpose:** We will be holding a picketing event calling on the President and members of the Economic Management Team to #FixTheCountry in light of the level of economic mismanagement and theft that has engulfed our government from the highest levels. The picketing will also allow citizens to express their opposition to the proposed military intervention in Niger as well as any other government policy decisions or initiatives.

The theme of the Picket is "Occupy Julohe House"

- b) **Date and Time:** The special event will on the 21st September 2023 from 6am in the Morning to 6pm in the afternoon.
- c) **Significance of the Date:** The date 21st September 2023, has been set aside as Kwame Nkrumah Memorial Day to remember the spirit of resilience and resistance that led the struggle against oppression and dispossession. As such we consider that this date for its national significance and direct connection to the purpose of the protest is vital to the message, we want our protest march to express.

In effect, if we were to be asked to change the date, this will gravely and unjustifiably interfere with our freedom of expression.

- d) **Format and proposed route and destination:** The demonstration will entail both an initial assembly at 37 Troto Station, a procession over a short distance and an eventual picketing at the forecourt of the Jubilee House.

Email: Secretariat@democracyhubgh.org

Tel: +233-303-959-661