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16 September 2026

THE DIRECTOR-GENERAL
CRIMINAL INVESTIGATION DEPARTMENT
GHANA POLICE SERVICE
CID HEADQUARTERS
ACCRA

Dear Sir/Madam,

PETITION FOR THE INVITATION AND INVESTIGATION OF HON. DOMINIC ADUNA BINGAB NITIWUL, MEMBER OF PARLIAMENT FOR BIMBILLA, IN RESPECT OF PUBLIC STATEMENTS CAPABLE OF PROVOKING ETHNIC SENTIMENTS, CAUSING FEAR AND ALARM AND DISTURBING THE PUBLIC PEACE

We, **Solomon Owusu and Andrew Appiah-Danquah**, both citizens of the Republic of Ghana, respectfully submit this petition to the Criminal Investigation Department of the Ghana Police Service for the urgent invitation and investigation of **Hon. Dominic Aduna Bingab Nitiwul, Member of Parliament for Bimbilla**, concerning statements made by him in a video recording presently circulating in the public and electronic media.

This petition is submitted out of genuine concern for the preservation of public peace, national cohesion and harmonious relations among the different ethnic communities living and conducting business in Accra.

We respectfully state that the statements attributed to the Honourable Member of Parliament go materially beyond legitimate criticism of a governmental policy or redevelopment programme. They introduce an inflammatory ethnic dimension into a matter relating to the proposed redevelopment of the Konkomba Yam Market and the establishment of a 24-hour market at Agbogbloshie.

The statements are capable of creating fear among members of the Konkomba community, engendering resentment against the Government and the Accra

Metropolitan Assembly, and creating an atmosphere in which confrontation between affected traders and public officers may occur.

1. THE IMPUGNED PUBLICATION

On or about 16 September 2026, a video recording containing a public address by Hon. Dominic Aduna Bingab Nitiwul came to our attention.

The recording has since been circulated through social-media platforms and other electronic channels and has consequently reached, or is capable of reaching, a substantial section of the Ghanaian public.

In the recording, the Honourable Member of Parliament repeatedly portrayed the proposed redevelopment exercise as a deliberate governmental action directed specifically against members of the Konkomba ethnic group.

Among other statements, he stated substantially as follows:

“We don’t see what the Konkomba tribe has done against the Government, that they have only come to the centre of Agbogbloshie, where the Konkombas reside, and decided to site the 24-hour market there.”

He continued:

“They left the site this way; they left the site behind; they left the site at the other side—but only marked where the Konkomba people are. We feel that it is targeted at just removing the Konkombas from Accra.”

He further asserted:

“Why is it that only where the Konkombas are are the places that he marked?”

The Honourable Member also stated:

“What did they do that you have decided to come to the centre where the Konkombas are?”

He further alleged:

“You left all the other areas and came to where only the Konkombas are—where they have their market. You have marked every store in the market to be demolished. You have also marked where they sleep to be demolished and left every other person.”

He then asked:

“What crime have they committed? Are they not Ghanaians? So why? Why are they being targeted?”

The Honourable Member proceeded to address the President in the following terms:

“So, Mr President, stop your Mayor. Mr President, let him stop targeting the Konkomba tribe.”

Of particular concern are his further declarations:

“They are not moving tomorrow.”

And:

“Who was afraid to bring his yams before they said they would demolish? Let them know that they should continue to bring their yams.”

He also warned:

“It will be politically suicidal for the President to allow the Mayor to touch them and to do what he is thinking of doing.”

The cumulative effect of these statements is the public representation that the Government and the Accra Metropolitan Assembly have conceived and are implementing a programme deliberately calculated to discriminate against, displace and remove members of the Konkomba ethnic group from Accra.

2. THE ETHNIC CHARACTERISATION OF THE MATTER

We recognise and affirm the constitutional right of every person, including a Member of Parliament, to criticise governmental policies and advocate for affected persons.

Our complaint is not founded upon the mere fact that Hon. Nitiwul criticised the Government, the Mayor of Accra or the proposed redevelopment exercise.

Our concern arises from the deliberate and repeated presentation of the matter as an organised governmental attack upon a particular ethnic group.

The Honourable Member did not merely allege that traders, tenants, occupiers or market operators were being affected by a redevelopment exercise. He repeatedly invoked the identity of the **Konkomba tribe** and alleged, expressly or by necessary implication, that:

1. the Government and the Mayor had deliberately selected the area occupied by Konkombas;
2. adjoining areas occupied by persons outside that ethnic community had intentionally been excluded;
3. the real purpose of the exercise was to remove Konkombas from Accra;
4. the affected persons were being treated as though they were not Ghanaians;
5. the redevelopment exercise was an instance of ethnically targeted discrimination; and
6. the affected traders should remain at the location and continue bringing their goods despite the intended exercise.

These are exceptionally grave allegations. If untrue, they are capable of causing fear and alarm among members of the Konkomba community, creating hostility towards the Government and the Accra Metropolitan Assembly, and undermining peaceful relations between the community, public officials and other persons within the affected area.

The repeated suggestion that the Government is attempting to drive an ethnic community out of the national capital is not an ordinary disagreement about planning policy. It is an allegation capable of awakening ethnic suspicions and mobilising resistance upon an ethnic basis.

3. IMMEDIATE RISK TO PUBLIC PEACE

The statements must be assessed in the context in which they were made.

The proposed exercise was presented as imminent. The statement that the traders “are not moving tomorrow,” coupled with the instruction that they should “continue to bring their yams,” is capable of being understood as an invitation to remain at the disputed location and defy the intended exercise.

Where affected traders have been told by a prominent Member of Parliament that the Government is deliberately targeting their tribe and seeking to remove them from Accra, any subsequent arrival of public officers, police personnel or demolition equipment could be perceived by members of the community as the execution of an ethnic agenda rather than an administrative or redevelopment exercise.

That perception creates a real danger of:

1. confrontation between traders and public officers;
2. resistance to the implementation of lawful administrative measures;
3. damage to public or private property;
4. injury to traders, public officers or innocent bystanders;

5. mobilisation of persons along ethnic lines;
6. retaliatory political or ethnic rhetoric; and
7. a general disturbance of the public peace.

Ghana's history and social composition demand considerable responsibility from public officers and political leaders when discussing matters affecting identifiable ethnic communities. Statements capable of transforming a planning dispute into an allegation of ethnic persecution must be treated with the seriousness they deserve.

Article 35(5) of the Constitution requires the State actively to promote the integration of the peoples of Ghana and prohibit discrimination and prejudice on the ground of ethnic origin. Article 35(6)(a) further requires appropriate measures to foster loyalty to Ghana above sectional and ethnic loyalties.

The Ghana Police Service consequently has a legitimate preventive and investigative interest in determining whether the statements were founded upon verified facts and whether their publication constitutes a criminal offence.

4. POSSIBLE OFFENCE UNDER SECTION 207 OF ACT 29

Section 207 of the Criminal Offences Act, 1960 (Act 29) provides:

"A person who in a public place or at a public meeting uses threatening, abusive or insulting words or behaviour with intent to provoke a breach of the peace or whereby a breach of the peace is likely to be occasioned commits a misdemeanour."

We respectfully submit that the statements warrant investigation under this provision.

The investigation should determine:

1. the exact location and circumstances in which the statements were made;
2. whether the statements were made in a public place or at a public meeting;
3. the composition, disposition and reaction of the audience;
4. whether tensions already existed between the traders and the relevant authorities;
5. whether public officers were expected to undertake an enforcement or demolition exercise imminently;
6. whether the declarations that the traders would not move and should continue bringing their yams were intended or reasonably likely to encourage resistance;
7. whether the repeated allegation of deliberate ethnic targeting was likely to provoke hostility or a breach of the peace; and

8. whether any conduct, agitation or mobilisation followed the publication. Section 207 does not require the Police to wait until violence actually occurs. Where words or behaviour used publicly are reasonably likely to occasion a breach of the peace, the Police have a duty to investigate and, where appropriate, intervene before the threatened disorder materialises.

5. POSSIBLE OFFENCE UNDER SECTION 208 OF ACT 29

Section 208(1) of the Criminal Offences Act, 1960 (Act 29) provides:

“A person who publishes or reproduces a statement, rumour or report which is likely to cause fear and alarm to the public or to disturb the public peace knowing or having reason to believe that the statement, rumour or report is false commits a misdemeanour.”

Section 208(2) further places material importance upon whether reasonable measures were taken to verify the accuracy of the published statement, rumour or report.

The video constitutes, at the very least, a publication or reproduction of statements and reports concerning the purpose, scope and intended effect of the proposed redevelopment exercise.

The following factual representations are capable of objective investigation:

1. that only the area occupied by members of the Konkomba community was marked;
2. that comparable adjoining areas were deliberately excluded;
3. that every store within the Konkomba Yam Market was marked for demolition;
4. that the places where the traders sleep were marked for demolition while the premises of other persons were left untouched;
5. that the size of the land demarcated substantially exceeded what was reasonably required for the proposed 24-hour market;
6. that the purpose of the exercise was to target members of the Konkomba ethnic group;
7. that the Government or the Mayor intended to remove Konkombas from Accra; and
8. that the redevelopment exercise was not genuinely intended to establish a 24-hour market.

The truth or falsity of these representations should not be determined through competing political statements. It should be established through an impartial investigation involving site inspections, official plans, notices, maps, photographs, interviews and all relevant documentary evidence.

If the official redevelopment plans, site markings and affected-property schedules establish that the exercise is not confined to members of the Konkomba community, the allegation that the Government is deliberately targeting that ethnic group would be materially misleading.

The CID should therefore investigate:

1. the source of the Honourable Member's information;
2. the documents, site plans, notices or briefings upon which he relied;
3. whether he personally inspected the entirety of the proposed project area;
4. whether he sought information or clarification from the Accra Metropolitan Assembly;
5. whether he knew that persons outside the Konkomba community were also affected;
6. whether he had reason to believe that any material part of his representations was false;
7. what reasonable measures he took to verify the accuracy of the statements before publishing them; and
8. whether the publication was likely to cause fear and alarm or disturb the public peace.

A public allegation that the Government is pursuing an ethnic group from Accra is inherently capable of causing fear among members of that community. It is equally capable of disturbing public peace, particularly when connected to an imminent enforcement exercise and accompanied by declarations that the affected persons will not move.

6. STATUS OF THE PERSON WHO MADE THE STATEMENTS

Hon. Nitiwul is not merely a private individual expressing an opinion in an informal conversation. He is a sitting Member of Parliament, a former Minister of Defence and a person whose public statements carry substantial influence and are likely to be taken seriously by his constituents, supporters and members of the affected community.

That status does not deprive him of his right to freedom of speech. It does, however, increase the reasonably foreseeable impact of his public statements and the corresponding need for factual responsibility where allegations capable of provoking ethnic sentiment are made.

The statements under consideration were not made in the course of parliamentary proceedings. They were made publicly and have been widely circulated outside Parliament. They should therefore be investigated in the same manner as any other public communication potentially falling within the criminal law.

7. FREEDOM OF EXPRESSION AND RESPONSIBLE INVESTIGATION

We are mindful of article 21(1)(a) of the Constitution, which guarantees freedom of speech and expression.

This petition does not invite the Ghana Police Service to suppress criticism, punish dissent or interfere with lawful political advocacy. Neither do we invite the CID to presume the guilt of the Honourable Member.

Freedom of expression is indispensable to Ghana's constitutional democracy. However, it must be exercised consistently with the rights and freedoms of others and the public interest, as contemplated by article 12(2) of the Constitution.

The protection of political speech does not prevent the Police from investigating whether material factual representations were knowingly or recklessly published in circumstances likely to generate ethnic fear, hostility or public disorder.

An impartial investigation will protect both the public interest and the Honourable Member. If his statements are supported by verified facts, the investigation will establish that fact. If they are not, the criminal law must be permitted to take its course without fear, favour or political consideration.

8. RELIEFS AND ACTION REQUESTED

In view of the foregoing, we respectfully request the Criminal Investigation Department to:

- 1. formally receive and register this petition and provide us with the relevant case or reference number;**
- 2. secure, preserve and forensically authenticate the complete and unedited video recording and all material electronic publications of the statements;**
- 3. invite Hon. Dominic Aduna Bingab Nitiwul to assist the investigation and provide the factual and documentary basis for his representations;**
- 4. obtain statements from the relevant officials of the Accra Metropolitan Assembly, including the Mayor and the officers responsible for the proposed redevelopment;**
- 5. obtain and examine the approved redevelopment plan, site plan, affected-property schedule, demolition or relocation notices and all relevant maps and documents;**
- 6. undertake an independent inspection of the affected area to determine which structures, stores and adjoining areas were marked;**
- 7. interview the leadership and members of the Konkomba Yam Market and other persons occupying adjoining areas;**

8. determine whether the proposed exercise was ethnically selective or whether persons and structures outside the Konkomba community were equally affected;
 9. investigate what reasonable measures, if any, the Honourable Member took to verify the accuracy of his statements before publication;
 10. assess the public dissemination, reach and effect of the statements, including whether they generated fear, hostility, mobilisation or threats of resistance;
 11. investigate whether the statements and the circumstances of their publication disclose offences under sections 207 and 208 of the Criminal Offences Act, 1960 (Act 29), or any other applicable law;
 12. take all lawful preventive measures necessary to avert confrontation, ethnic tension or a breach of the peace at the affected location; and
 13. take such further lawful action as the evidence and the outcome of the investigation may warrant.
- 9. CONCLUSION**

The repeated invocation of the Konkomba ethnic identity and the allegation that the Government is deliberately seeking to remove members of that community from Accra are matters of grave national concern.

The statements are capable of converting an administrative and redevelopment dispute into a confrontation founded upon ethnic fear and resentment. The danger is aggravated by the declaration that the traders will not move and the encouragement that they should continue bringing their goods to the affected location.

The Ghana Police Service should not wait for confrontation, injury or public disorder before examining whether the statements were false, recklessly published or likely to provoke a breach of the peace.

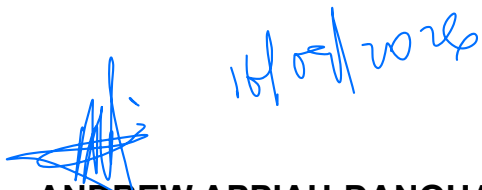
We accordingly request the CID to treat this petition with the urgency and seriousness it deserves, invite Hon. Dominic Aduna Bingab Nitiwul to assist with investigations, establish the truth or otherwise of the factual representations and take appropriate action in accordance with law.

We affirm our readiness to provide the electronic recording, transcript and any additional information reasonably required for the investigation.

Yours faithfully,



SOLOMON OWUSU
PETITIONER

Handwritten signature in blue ink and the date "18/07/2024" in blue ink.

ANDREW APPIAH-DANQUAH, ESQ.
PETITIONER

ENCLOSURES

1. Electronic copy of the video recording containing the impugned statements.
2. Written transcript of the material portions of the recording.
3. Screenshots or links showing the public circulation of the recording, where available.
4. Any other relevant documentary material.

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