

MAX CONSOLIDATED LAW FIRM
2ND FLOOR PALMER HOUSE ADABRAKA, ACCRA
TEL: 0247110864/0202811685

1st July 2021

THE GENERAL SECRETARY
CONVENTION PEOPLES PARTY (CPP)
ASYLUM DOWN
ACCRA

Dear Madam,

IN THE MATTER OF CHAPTER 10 ARTICLE 93 CLAUSES (C), (E) AND (F) OF THE
CONSTITUTION OF THE CONVENTION PEOPLES PARTY (CPP)

- PETITION FOR COMPLIANCE WITH CONSTITUTIONAL REQUIREMENT

We act as solicitors for Thomas Abroni and Isaac K. Annan our clients, who are members of the Convention Peoples Party (CPP) in good standing, for and on whose behalf we write this letter to you in respect of the named subject

We are informed by our clients that pursuant to the aforementioned Chapter 10, Article 93 (c), (e) and (f) of the Constitution of the Convention Peoples Party (hereinafter referred to as the Party) whenever there is an election for the position of a National Chairman, the requirement is that upon the failure of a candidate to obtain Fifty Percentum (50%) the election should be re-run, provided that the candidates who contested it are more than one (1).

Please for the avoidance of doubt and for ease of reference we deem it prudent to quote the aforesaid Constitutional provisions here:

ARTICLE 93: "The National Chairperson/Leader"

ARTICLE 93 (c) "The National Chairperson and Leader of the Party shall be elected by secret ballot without debate by members present at the National Delegates Congress, under the supervision of the Electoral Commission"

ARTICLE 93 (e): "A candidate for election to the office of National Chairperson and Leader shall be deemed to have been duly elected if more than 50% of the members of Congress present and voting, voted in his favour."

ARTICLE 93 (f): "Where at the election of the National Chairman and Leader there are two candidates and no candidate obtains the votes specified in clause (e) of this Article, another election shall be held between the two candidates who obtained the highest number of votes, to select the winner".

We are informed by our clients to remind your goodself and the august Party to the effect that at the last Congress held on or about the 24th August 2020 four (4) candidates contested for the position of Chairmanship/Leader namely: 1. Hajia Hamdatu 2. Oduro Kwarteng 3. Nana Akosua Frimpomaa Sarpong Kumankoma and 4. Mr. Quansah.

We are further informed that in the said election, Nana Akosua Frimpomaa Sarpong Kumankoma came first with 915 votes representing about 46% of the total votes cast followed by Hajia Hamdatu with 682 votes.

From the foregoing, it is clear that no one thus becomes the Chairperson and Leader of the Party until the provision in clause (f) above has been complied with.

Our clients inform us that since the aforesaid date (24th August 2020) the Party has not organised another election between the two leading candidates to wit; Nana Akosua Frimpomaa Sarpong Kumankoma and Hajia Hamdatu.

Our clients further say that even though as aforesaid, no election has yet been held pursuant to the relevant provisions of the Constitution, the Electoral Commission has sworn in candidate Nana Akosua Frimpomaa Sarpong Kumankoma which said act conspicuously sins against the Party's Constitution.

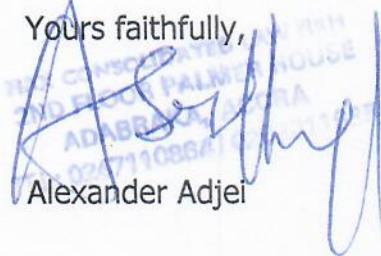
We are instructed by our clients to notify you that to the extent that a mandatory provision of the Party's Constitution was not followed, the swearing in notwithstanding, candidate Nana Akosua Frimpomaa Sarpong Kumankoma cannot lawfully act as the chairperson and leader of the Party.

We are instructed by our clients to demand the holding of an election within one month from the date this letter is served upon your goodself to elect a candidate as the Party's Chairman and Leader.

Please take notice and notice is hereby served upon you to the effect that upon your refusal, failure or neglect to comply with our humble demand as hereinabove stated, we shall not hesitate to file a lawsuit against the Party to compel it to do so. In that case the Party should anticipate washing its dirty linen in public in addition to the obligation to pay our legal fees and damages among other court costs.

Be advised accordingly. Thank you.

Yours faithfully,



Alexander Adjei

CC:

1. The Chairman
Council of Elders of the CPP
2. Central Committee of the CPP
3. The Chairman
Legal and Constitutional Affairs
4. The Administrator
CPP Headquarters
Asylum Down
Accra
5. Comrade Nana Akosua Frimpong Sarpong Kumankoma
6. Thomas Abroni
7. Isaac K. Annan