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4th April, 2023

The Parliamentary Primaries Vetting Committee
National Democratic Congress
Keta Constituency
Keta

Dear Sir/Madam,

**RE: PETITION FOR THE DISQUALIFICATION OF DR. EMMANUEL
KOJO JONES-MENSAH FROM CONTESTING THE 2023 NDC
PARLIAMENTARY PRIMARIES ELECTIONS
IN THE KETA CONSTITUENCY**

We write as lawyers for and on behalf of Dr. Emmanuel Kojo Jones-Mensah.

Our client informs us of the circulation of a document with the above-referenced caption supposed to be a petition against his eligibility to contest for the National Democratic Congress primaries for parliamentary aspirants in the Keta Constituency. Considering the importance of the primaries and his participation, he has instructed us to formally respond despite the fact that he has not yet been formally served with the document. We hereby attach the supposed petition for ease of reference.

The supposed petition, alleges some membership registration irregularities on the part of our client in the Keta and Ashaiman Constituencies but we on behalf of our client categorically deny all the allegations against him and urge the Vetting Committee to dismiss them as being false, malicious and misleading.

We clarify the position of our client within the context of the guidelines issued for use by the Vetting Committee during conduct of the vetting of all parliamentary aspirants as follows:

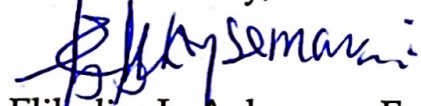
1. Dr. Emmanuel Jones-Mensah is a validly registered member of the National Democratic Congress at VALCO FLAT BASE I branch of the Ashaiman Constituency since 2018. **Attached and marked as Exhibit EJM 1 is a copy of his membership card.**
2. Dr. Emmanuel Jones-Mensah is on record to have denounced and renounced registration of his name as a member of the Keta Constituency and has long dissociated himself from the wrongful insertion of his name in the Register. **Attached and marked as Exhibit EJM 2 is a copy of a letter renouncing the wrongful entry of his name in the Keta register.**
3. Dr. Emmanuel Jones-Mensah therefore filed his nomination papers with the Keta Constituency Office stating therein his membership of the VALCO FLAT BASE I branch of the Ashiaman Constituency and not the Keta Constituency.
4. Paragraph 2.1 (III) of the guidelines for the vetting of all aspirants does not preclude the participation of members of different constituencies in the parliamentary primaries of other constituencies. **Attached and marked as Exhibit EJM 3 is a copy of the Guidelines.**
5. The alleged violations in Ashaiman with regard to Dr. Emmanuel Jones-Mensah's unique identity number are misleading references and complete red herring. Dr. Jones-Mensah as can be seen from the source membership register of the VALCO FLAT BASE I branch of the Ashiaman Constituency is number 3 in the Register with a unique number whilst the person he is alleged to have impersonated in the register is number 4. That person is still validly registered and noted in the VALCO FLAT BASE I branch, Ashaiman Constituency register.
6. Dr. Emmanuel Jones-Mensah's unique membership number is H291100003 whereas Senyo Dumahlor's unique number is H291100004. **Attached and marked as Exhibit EJM 4 is a copy of the membership register of the VALCO FLAT BASE I branch of the Ashiaman Constituency.**

It is palpably clear from the above that our client has not violated any laws be it the Party or national constitution or the Party's guidelines for the vetting of aspirants. It is our prayer that your venerable committee should not entertain vexatious and frivolous allegations against hardworking and dedicated members of the NDC who are ready to serve humanity and improve fortunes of the party.

In the circumstances we humbly request that the supposed petition against our client be dismissed with all the contempt and disdain it deserves.

Respectfully submitted for your kind consideration in the interest of Justice.

Yours faithfully,



Elikplim L. Agbemava Esq.
Lead Counsel

cc: Dr. Emmanuel Kojo Jones-Mensah