

permission to operate a medical School. Three documents were attached to the letter of invitation:

- a. The Article of Incorporation from the Ministry of Foreign Affairs
- b. An Act of Legislature legitimizing the establishment of the School
- c. A letter of Attestation from the Commission on Higher Education, Ministry of Education.

allowing preparatory activities for the establishment of the School.

6. On Friday, March 18, 2005, three members of the Board visited what was supposed to be the "Campus of the St. Luke Medical School".

Those who visited were:

Assoc. Prof. Horatius Brown, MD, MSc, FWACS
Deputy Chief Medical Officer/JFK MC
Chairman, Liberia Medical Board

Assoc. Prof. Samuel Dopoe, MD, MSc (Specialist in
Otorhinolaryngology), Chairman, Department of ENT
Chief Medical Officer of JFK MC & Chairman of the Accreditation
Committee of the Board and

Prof. S. Benson Barh, BSc, MD, MPH, FWACP
Deputy Minister/Chief Medical Officer-RL and Secretary, LMB.

The findings of the Board were as follows:

- a. The Board had difficulties in locating the so-called "Campus" due to an uneasy access to a building in obscurity .
- b. The building was a run-down dwelling home under major renovation by a few workers.

c. The immediate surrounding of the building blends with the yards of dwelling homes in close proximity.

d. Inside the building for the so-called "St. Luke Medical School", the Board observed that there were:

- No Electricity
- No Running water
- No Library
- No Laboratory
- No Offices for faculty
- No student launch
- No class rooms -
- No staff list
- No faculty list
- No curriculum /No catalog
- No student hand book
- No rules governing aspects of the various academic domains.
- There was actually nothing in any form, shape or color of a medical school except for a few microscopes packed on one table in the living room, copies of books on the floor in one tight room, and a few arm chairs in the living room with an unpainted hard board inartistically hung up for a black board.

7. In disgust, the Board returned and convened a regular session at 4:00p.m., on Friday, March 18, 2005.

8. After a brief discussion of the findings of the requested visit, the Chairman of the Board was told to reply the letter of invitation.

The Chairman's letter written March 22, 2005, noted that:

- The Building for the School is still under major renovation.
- There is no document on the academic and administrative plans of the School.
- There is no Library, no Laboratory

- The site is not representative of a Medical School Campus.

The Chairman ended his letter by saying, "when these concerns are addressed, the Board shall revisit the site to determine if the school can be granted a permit to start the admission process".

Ladies and Gentlemen, these are the facts. The position of the Board on this issue is:

- There is no Medical School in Liberia called St. Luke Medical School.
- The Board can not and shall not discuss application of any "Doctor" from St. Luke Medical School unless it is accredited .
- Any attempt henceforth to abuse and insult the integrity and professionalism of the Liberia Medical Board will leave the Board with no alternative but to turn perpetrators and their collaborators over to the Justice Ministry for prosecution.

SIGNED: _____

Prof S. Benson Barh, BSc, MD, MPH, FWACP
DEPUTY MINISTER/CHIEF MEDICAL OFFICER-RL &
SECRETARY, LIBERIA MEDICAL BOARD

APPROVED: _____

Assoc. Prof. Horatius Brown, MD, MSc, FWACS
Deputy Chief Medical Officer JFK MC and
CHAIRMAN, LIBERIA MEDICAL BOARD

Exhibit 38 – Benson Barh Contract with SLSOM from 2004

**Exhibit 39 – Benson Barh Receipt of Payment from 2004
(reserved)**

**Exhibit 40 - "Secret Letter" sent by Benson Barh to W.H.O.,
the National Accreditation Board, and Medical and Dental
Council of Ghana (reserved)**

**Exhibit 41 – George Gollin’s Power Point Presentation that is
Linked at Least 7 Times On the Internet (reserved)**

Exhibit 42 – The First 5 Pages of the 91-page Document George Gollin Sent to the Ghana National Accreditation Board

**Exhibit 43 – The 91-page Document George Gollin Published
on his University of Illinois Website (reserved)**

See http://www.hep.uiuc.edu/home/g-gollin/pigeons/SLSOM/pacer_document_1_modified_version_electronic_exhibit_41.pdf

**Exhibit 44 – “Exhibit 1” from the Previous Lawsuit CV-01791-
RGK**

**Exhibit 45 – “Exhibit 1” George Gollin Published on his
University of Illinois Website (reserved)**

See

http://www.hep.uiuc.edu/home/g-gollin/pigeons/SLSOM/pacer_document_1_first_version_paper.pdf

Exhibit 46 – List of False Statements made in the 91-page document authored by George Gollin (reserved)

**Exhibit 47 – Letter from National Accreditation Board to the
Attorney General of Republic of Ghana submitted to Court
of Appeal**

"AG 7"

In case of reply the number and date of this letter should be quoted

My Ref. No. NAB/A/02/PTE/114
Tel. No.: 021 - 518629/518370/286013-4
Fax No.: 021 - 518629
E-mail: nabsec@nab.gov.gh
Website: www.nab.gov.gh



Filed on 15-12-2009
2:55 PM
Republic of Ghana

National Accreditation Board
Ministry of Education
P. O. Box CT 3256
Accra

December 11, 2009

THE HON. ATTORNEY-GENERAL &
MINISTER FOR JUSTICE
ATTORNEY-GENERAL'S DEPARTMENT
ACCRA

Dear Madam,

RE: IN THE MATTER OF THE REPUBLIC VS. NATIONAL ACCREDITATION BOARD
& ANOR EX PARTE: ST LUKE SCHOOL OF MEDICINE

We forward herewith, copies of letters we have received from the Dean of the University of Illinois College of Medicine, the Administrator of the Oregon Student Assistance Commission, Office of Degree Authorisation and a covering letter to the letter from the Ministry of Foreign Affairs and Regional Integration with regard to the pending case.

We would be grateful if you consider these letters in your further applications and submissions to the Court.

Yours faithfully,

RICHARD K. ADJEI
SENIOR ASSISTANT SECRETARY
FOR: EXECUTIVE SECRETARY

**Exhibit 48 – Caution Letter from Ministry of Foreign Affairs,
Republic of Ghana as a Result of Office of Degree
Authorization Letter, submitted to Court of Appeal**

In Case of reply the number and date of this letter should be quoted

TEL: 664951-3/664970/663750/
676765/664650/675027
FAX: 665363/667823

My Ref. No.
Your Ref. No.



REPUBLIC OF GHANA

MINISTRY OF FOREIGN AFFAIRS
AND REGIONAL INTEGRATION,
P. O. BOX M 53,
ACCRA, GHANA.

DATE: 20TH NOVEMBER, 2009.

**CAUTION AGAINST GRANTING OF APPROVAL/ACCREDITATION TO
ST. LUKE SCHOOL OF MEDICINE TO ISSUE MEDICAL DEGRESS IN GHANA**

I have been directed to forward, herewith, for your attention and urgent action, letter reference No. WA/INF/4 dated 17th November, 2009 and its attachment received from our Mission in Washington DC.

2. The Oregon Student Assistance Commission Office of Degree Authorization is by the letter cautioning the National Accreditation Board, (NAB) of Ghana against granting approval to St. Luke "School of Medicine", to enable the latter to Issue medical degrees to Ghanaians due to the fact that the activities the school do not confirm with foreign degrees accreditation practices of the U.S.A.
3. It would be most appreciated if the National Accreditation Board (NAB) could take urgent action to avert possible sanction against Ghanaian educational institutions.

Gloria Poku
For: MINISTER FOR FOREIGN AFFAIRS
& REGIONAL INTEGRATION
GLORIA POKU (MRS)
DEPUTY DIRECTOR/AMERICAS BUREAU

**MR. KWAME DATTEY,
NATIONAL ACCREDITATION BOARD (NAB),
NO. 6 BAMAKO STREET, EAST LEGON,
P. O. BOX CT 3256,
ACCRA.**

Encl.

**Exhibit 49 – Defamation Letter from Alan Contreras to
Republic of Ghana (faxed version) Submitted to Ghana
Court of Appeals**



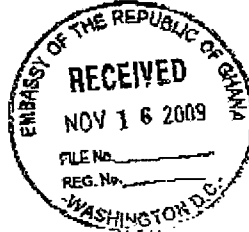
Oregon
Theodore R. Kulungozaj, Governor

18-11-89 17:38 Pg: 2

Oregon Student Assistance Commission
Office of Degree Authorization
1500 Valley River Drive, Suite 100, Eugene, OR 97401
(541) 687-7452; Fax: (541) 687-7419
www.osac.state.or.us/ODA

October 30, 2009

Mr. Kwame Dattay
National Accreditation Board (NAB)
No. 6 Bamako Street, East Legon
P. O. Box CT 3256
Accra
GHANA



Dear Mr. Dattay:

It has come to our attention that your agency may be about to issue an approval or accreditation to the notorious entity that does business under the name St. Luke "School of Medicine" or the like. We are concerned that an entity with the unsavory history of the St. Luke business might be allowed to issue so-called "medical degrees" that could be used by unscrupulous people around the world to practice medicine on unsuspecting patients.

We are concerned about what such a decision would mean to the reputation of Ghanaian colleges around the world. Oregon banned the use of St. Luke degrees several years ago, and we would have to ban the use of all Ghanaian degrees if St. Luke is approved. The reason for this is that Oregon law requires us to base acceptance of foreign degrees on the accreditation practices of the nation in question.

If the government of Ghana authorizes St. Luke to issue "medical degrees" we will have no choice but to conclude that Ghana does not have a meaningful postsecondary approval process, in which case degrees issued by the 23 colleges now operating in Ghana would no longer be usable in Oregon.

Oregon is a small state far from Ghana and it may be that a ban on all degrees issued in Ghana would not affect your country very much. However, we urge you to consider the consequences of other states and nations making similar decisions if you issue an approval to grant medical degrees to the entity called St. Luke.

It is possible that decision-makers in Ghana simply did not have all of the information about St. Luke's past practices and its desperate search for a government willing to allow it to sell degrees from a site outside the United States, where it began operating illegally in California some years ago. St. Luke is not and has never been a legitimate provider of medical degrees.

Sincerely,

Alan Comveras
Administrator

Mr. Adolphus K. Arthur, Deputy Chief of Mission, Embassy of Ghana, Washington, D.C.
Akumso Cook, Desk Officer for Ghana, U.S. Department of State, Washington, D.C.
Dr. E. Stephen Hunt, USNIE, International Affairs, U.S. Department of Education, Washington, D.C.
Mary Sebold, Public Affairs Officer, Embassy of the United States, Accra, Ghana



**Exhibit 50 – Defamation Letter from Alan Contreras to
Republic of Ghana (mail version) Submitted to Ghana
Court of Appeals**



Oregon
Theodore B. Kulungoshi, Governor

Oregon Student Assistance Commission
Office of Degree Authorization
1500 Valley River Drive, Suite 100, Eugene, OR 97401
(541) 687-7452; Fax: (541) 687-7419
www.osac.state.or.us/ODA

October 30, 2009

Mr. Kwame Dattey
National Accreditation Board (NAB)
No. 6 Barnako Street, East Legon
P. O. Box CT 3256
Accra
GHANA

Dear Mr. Dattey:

It has come to our attention that your agency may be about to issue an approval or accreditation to the notorious entity that does business under the name St. Luke "School of Medicine" or the like. We are concerned that an entity with the unsavory history of the St. Luke business might be allowed to issue so-called "medical degrees" that could be used by unscrupulous people around the world to practice medicine on unsuspecting patients.

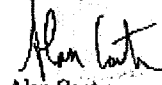
We are concerned about what such a decision would mean to the reputation of Ghanaian colleges around the world. Oregon banned the use of St. Luke degrees several years ago, and we would have to ban the use of all Ghanaian degrees if St. Luke is approved. The reason for this is that Oregon law requires us to base acceptance of foreign degrees on the accreditation practices of the nation in question.

If the government of Ghana authorizes St. Luke to issue "medical degrees" we will have no choice but to conclude that Ghana does not have a meaningful postsecondary approval process, in which case degrees issued by the 23 colleges now operating in Ghana would no longer be usable in Oregon.

Oregon is a small state far from Ghana and it may be that a ban on all degrees issued in Ghana would not affect your country very much. However, we urge you to consider the consequences of other states and nations making similar decisions if you issue an approval to grant medical degrees to the entity called St. Luke.

It is possible that decision-makers in Ghana simply did not have all of the information about St. Luke's past practices and its desperate search for a government willing to allow it to sell degrees from a site outside the United States, where it began operating illegally in California some years ago. St. Luke is not and has never been a legitimate provider of medical degrees.

Sincerely,


Alan Contreras
Administrator

- cc: Mr. Adolphus K. Arthur, Deputy Chief of Mission, Embassy of Ghana, Washington, D.C.
- Abonma Cook, Desk Officer for Ghana, U.S. Department of State, Washington, D.C.
- Dr. E. Stephen Hues, USNEI, International Affairs, U.S. Department of Education, Washington D.C.
- Mary Scholl, Public Affairs Officer, Embassy of the United States, Accra, Ghana



**Exhibit 51 – Defamation Letter from Brad Schwartz to
Republic of Ghana (mail version) Submitted to Ghana
Court of Appeals**

UNIVERSITY OF ILLINOIS COLLEGE OF MEDICINE

Office of the Regional Dean
at Urbana-Champaign

190 Medical Sciences Building, MC-714
506 South Mathews Avenue
Urbana, IL 61801-3618

November 16, 2009

Mr. Kwame Dattey
National Accreditation Board (NAB)
No. 6 Bamako Street, East Legon
P.O. Box CT 3256
Accra
GHANA

Dear Mr. Dattey:

As the Dean of a medical school that recruits from the most accomplished graduates of non-U.S. medical schools into its residency, I have concerns about the impending accreditation decision for what purports to be the St. Luke School of Medicine. I have had the opportunity to review data in the public domain about this alleged school, and about individuals who claimed to have earned a medical degree from it. There is no evidence whatsoever that this alleged school really exists, or that there are adequate facilities for the most rudimentary components of a medical curriculum. In fact, all evidence says that only a small empty unimproved room is at the location advertised for the St. Luke's School of Medicine.

Understanding that high quality is not absolutely dependent upon physical structures, I took the opportunity to review the publicly available records of individuals who claim to have graduated from this alleged school for evidence of a bona fide education. There are records of twelve individuals who claim to have degrees from St. Luke's. None of these people are licensed to practice medicine, and at least two have been incarcerated for practicing medicine without a license.

I bring this to your attention because accreditation or approval of the alleged St. Luke School of Medicine by officials in Ghana would make medical schools in the United States worry about the quality of any medical school in Ghana. As a result, such approval of St. Luke would put the graduates of legitimate medical schools in your country at a distinct disadvantage when attempting to gain advanced medical training.

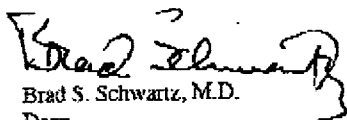
Hence, by denying accreditation to St. Luke School of Medicine you will protect the reputations of legitimate medical school graduates from Ghana. Moreover, by denying St. Luke any hint of legitimacy you will protect innocent patients from abuse at the hands of potential pseudo-graduates.

Telephone: (217) 333-5465 / Fax: (217) 333-8668 / Email: comacc@med.uiuc.edu / www.med.uiuc.edu

UIC • Chicago • Peoria • Rockford • Urbana-Champaign

The entity that passes itself off as the St. Luke School of Medicine has never been a legitimate educator of medical practitioners, and I urge you to make the owners of this entity own up to their dishonesty.

Sincerely,



Brad S. Schwartz, M.D.
Dean
Professor of Biochemistry and Medicine