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27th July, 2026.

The Director-General,
State Security Service,
1, Maitama Avenue
Abuja.

*Received by Jomwee
22/7/2026*

[Signature]

PETITION AGAINST BARR. DARLINGTON AGOMOU ARISING FROM HIS
PUBLIC BROADCAST ALLEGING THAT MR. GBENGA KOMOLAFE, FNSE,
"WENT AWAY" WITH ₦5 TRILLION AND US\$1.4 BILLION IN PUBLIC
FUNDS, AND REQUEST FOR AN URGENT SECURITY INVESTIGATION
INTO THE SOURCE, AUTHENTICITY, MOTIVATION AND NATIONAL
SECURITY IMPLICATIONS OF THE SAID ALLEGATIONS

We act as Solicitors to Mr. Gbenga Komolafe, FNSE (hereinafter referred to as "our Client") and write on his firm instructions.

2. Our client is a legal practitioner, a renowned petroleum engineer and a highly accomplished career public servant whose professional career has been marked by decades of exemplary service to the Federal Republic of Nigeria. He served with distinction in several strategic capacities within and outside the Nigerian National Petroleum Corporation (NNPC) and, most recently, as the Commission Chief Executive of the Nigerian Upstream Petroleum Regulatory Commission (NUPRC) from September 2021 until December 2025.
3. During this period, he occupied one of the most sensitive regulatory positions within Nigeria's petroleum industry, serving under the administrations of both His Excellency, the late President Muhammadu Buhari, GCFR, and His Excellency, President Bola Ahmed Tinubu, GCFR.
4. Throughout his public service, our client discharged his duties with professionalism, integrity and fidelity to the law. At no time has he ever been indicted, charged before any court of competent jurisdiction or convicted of any offence involving corruption, diversion of public funds, fraud, financial

impropriety or abuse of office. It is against this background that we respectfully present this Petition.

BACKGROUND

5. Our client recently became aware of a programme broadcast by **Voice of the People**, during which **Barr. Darlington Agomou** made the following categorical statement concerning him:

"Gbenga Komolafe of the oil sector, after forensic examination of his department, 5 trillion Naira and 1.4 billion dollars was discovered to be missing. What are you supposed to do if you are actually looking for money? But he was asked to go away with that money. Meanwhile, you now turn around oh, to go and borrow 568 million dollars to go and do Badagry-Sokoto highway. Meanwhile, somebody went away with 1.4 billion dollars. Please, where is the sense in all these things? Where is the wisdom in all these things? Tell me. Eh? It is just a waste. Wasting money right, left, and center. And you are telling me that eh... In fact, it is unthinkable. Don't even go there, because I didn't see one—one single effort of any reform here. No reform here."

6. The statement was presented to millions of viewers not as speculation, opinion or commentary, but as an established fact supposedly arising from a forensic examination. No investigative agency was identified. No forensic report was produced. No audit was cited. No judicial decision or official finding was referenced.
7. In addition, the programme remains publicly available on Facebook at: <https://www.facebook.com/share/v/18zv5tN8KA/?mibextid=wwXlfr>, where it has continued to attract viewers, comments, shares and republication, thereby compounding the injury suffered by our client each passing day.

NATIONAL SECURITY DIMENSION

8. Ordinarily, it is settled that defamatory publications are matters for civil redress. However, this publication transcends a private dispute and raises issues which, in our respectful view, directly engage the statutory mandate of the Service.
9. The allegation concerns a former Chief Executive of Nigeria's principal upstream petroleum regulatory institution and attributes to him the disappearance of **₦5 trillion** and **US\$1.4 billion**, figures of extraordinary national significance which amount to close to 10% of Nigeria's 2026 National Budget.

10. If such allegations are true, they undoubtedly disclose matters of profound national importance requiring immediate security attention. Conversely, if they were deliberately fabricated or recklessly disseminated without any factual foundation, the implications are equally grave. The deliberate circulation of false allegations of this magnitude against the former head of a critical national regulatory institution is capable of:
- a. undermining public confidence in the integrity of strategic government institutions responsible for the regulation of Nigeria's petroleum industry;
 - b. diminishing domestic and international confidence in Nigeria's regulatory and investment environment;
 - c. provoking unnecessary public distrust, suspicion and anxiety concerning the management of national petroleum resources;
 - d. damaging Nigeria's international reputation by portraying its strategic institutions as having tolerated the disappearance of trillions of Naira and billions of United States Dollars without investigation or accountability;
 - e. encouraging the dissemination of misinformation capable of eroding confidence in governmental institutions and national economic governance.
11. As your office is aware, the petroleum sector remains the backbone of Nigeria's economy and constitutes one of the country's most strategic national assets. Statements alleging the disappearance of public funds on the scale asserted by **Barr. Darlington Agomou** cannot reasonably be dismissed as ordinary political rhetoric. They possess the potential to influence public perception, investor confidence and national discourse in a manner warranting careful security assessment.
12. The issue before your Service is therefore not merely whether the allegations have injured our client's reputation. It is whether allegations of such magnitude were responsibly made upon credible intelligence or official information, or whether they were knowingly fabricated or recklessly disseminated in circumstances capable of undermining public confidence in institutions critical to Nigeria's economic security.

OUR PRAYERS

Our client welcomes every lawful investigation into his stewardship in public office and has nothing whatsoever to conceal. Indeed, if **Barr. Darlington Agomou** possesses any authentic forensic report, intelligence assessment, investigative finding

or official document establishing the disappearance of **₦5 trillion and US\$1.4 billion** into our client's personal purse as alleged, such information ought properly to be made available to the appropriate authorities.

If, however, no such material exists, it becomes imperative to ascertain the origin, purpose and circumstances surrounding the publication of allegations of such exceptional gravity against a former public officer who occupied a sensitive national office.

In the foregoing circumstances, we respectfully request that the State Security Service urgently conduct a discreet investigation into the following matters:

- a. The source, authenticity and credibility of the information relied upon by **Barr. Darlington Agomou** in publicly asserting that a forensic examination established the disappearance of **₦5 trillion and US\$1.4 billion** under our client's stewardship, including whether any such forensic report, intelligence assessment, investigative report or official record exists.
 - b. Whether **Barr. Darlington Agomou** possessed any credible documentary or other evidential basis for making the allegations at the time of the broadcast, or whether they were knowingly false or recklessly disseminated without verification.
 - c. The circumstances surrounding the preparation, authorization, broadcast and continued dissemination of the programme by **Voice of the People**, including whether the publication formed part of any coordinated effort to disseminate false information capable of undermining confidence in strategic public institutions.
13. To what extent the acts of **Barr. Darlington Agomou** are capable of igniting public uproar and incitement that can endanger the life of our client and his family.

Our client undertakes to make himself available to provide any statement or documentation that may assist your Service in the discharge of its statutory responsibilities. *We have also taken the liberty of extracting the video in question and annexing it in the flash drive attached to this correspondence, for ease of reference.*

Given the seriousness of the allegations and their potential implications for public confidence in strategic national institutions, we respectfully request that this Petition be accorded urgent attention.

Accept the assurances of our warmest esteemed regards, please.



CHIKAOSOLU OJUKWU, SAN, MCI Arb. (UK)
Principal Partner



Encl.:

- Flash Drive containing video recording of Barr. Darlington Agomou taken on "VOP This Morning" available here:
<<https://www.facebook.com/share/v/18zv5tN8KA/?mibextid=wwXIfr>>