

OJUKWU CHIKAOSOLU & CO.

60 GABORONE STREET WUSE ZONE 2, ABUJA. TEL: 08064097912

REF: OC/ABJ/EXT/ /2026

27th July, 2026.

Barr. Darlington Agomou

C/o Voice of the People

4, Ogbomosho Street,

Area 8, Garki, Abuja.

**DEMAND FOR IMMEDIATE RETRACTION, WRITTEN APOLOGY AND CEASE-
AND-DESIST IN RESPECT OF FALSE, SCANDALOUS AND DEFAMATORY
STATEMENTS MADE AGAINST OUR CLIENT, MR. GBENGA KOMOLAFE,
FNSE**

We act as Solicitors to **Mr. Gbenga Komolafe, FNSE** (hereinafter referred to as “our Client”), on whose firm instructions we write.

Our client is a legal practitioner, a foremost petroleum engineer and a distinguished career public servant who served the Federal Republic of Nigeria meritoriously and with distinction in various capacities within and outside the Nigerian National Petroleum Corporation and, most recently, as the **Commission Chief Executive** of the **Nigerian Upstream Petroleum Regulatory Commission**. He is the recipient of several local and international honours, including a Professional Doctorate in Leadership (Energy Law) and the Global Sustainable Leadership Award conferred upon him at the **Global Sustainable Education and Leadership Conference 2025**, held at the House of Lords, Palace of Westminster, United Kingdom, by the International Business School of Scandinavia.

Throughout his distinguished public-service career, our client discharged his responsibilities with integrity, probity and professionalism and without any finding of impropriety against him. Having completed his tenure in public office, he has since resumed life as a private citizen. At no time has he been indicted, charged or convicted in respect of any allegation of corruption, fraud, financial misconduct or abuse of office.

Your Defamatory Statements

It has come to our client's attention that, during a programme recently broadcast live by **Voice of the People** to audiences within and outside Nigeria, at which you appeared and were presented as a legal analyst, you made several grave, reckless and highly defamatory statements concerning him.

In the course of the said programme, you stated as follows:

"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."

In their natural and ordinary meaning, and by necessary implication and innuendo, those words conveyed to the reasonable viewer and listener that our client corruptly diverted, stole, looted and personally absconded with the sums of **₦5 trillion** and **US\$1.4 billion** belonging to the Federal Republic of Nigeria and was thereafter deliberately permitted to escape accountability.

We are instructed by our client, and verily believe him, that these allegations are entirely false, malicious, reckless, baseless and unsupported by any credible evidence. They were presented by you as established facts notwithstanding the absence of any identified forensic report, investigative finding, indictment, criminal charge or judicial decision linking our client to the alleged disappearance or diversion of the sums attributed to him.

For the record, our client has never been indicted by any law-enforcement or investigative agency, charged before any court, or convicted of any offence involving corruption, theft, fraud, embezzlement, financial impropriety or abuse of office, much less any allegation involving the staggering sums which you publicly accused him of taking.

As a legal practitioner and public commentator, you knew, or ought reasonably to have known, the grave reputational consequences of publicly accusing a named individual of stealing public funds. You were under an elementary obligation to verify the truth and evidential foundation of the allegations before presenting them to the public as facts. You nevertheless proceeded to make the statements without identifying any source, audit report, official record or other credible material capable of substantiating them.

The inevitable meaning conveyed by your publication is that our client is a thief, a looter of public funds, a corrupt former public officer and a person who unlawfully enriched himself with public assets on an extraordinary scale. The statements were plainly calculated to expose him to hatred, ridicule, contempt and opprobrium and to lower him in the estimation of right-thinking members of society.

Your Responsibility for the Publication

Your personal responsibility for the statements is direct and unambiguous. You were not merely reporting allegations made by another person or neutrally commenting upon a published official record. You personally uttered the words complained of and presented them as factual assertions to a global audience.

The fact that the statements were made during a programme hosted by a broadcasting organisation does not absolve you of personal liability as the author and publisher of the defamatory words. Your participation in the programme and the subsequent dissemination and republication of the broadcast through digital platforms have substantially extended the reach and permanence of the publication.

The programme remains accessible through online and social-media platforms, including Facebook, where it continues to attract views, comments, shares and republication. The continued availability of the material compounds the injury suffered by our client and ensures that the allegations remain capable of being encountered and disseminated by new audiences.

Damage Occasioned to Our Client

The injury caused by your statements cannot be overstated. Our client has painstakingly built an enviable professional and personal reputation over several decades of distinguished service to Nigeria. Your publication has exposed him to public suspicion, ridicule, contempt and opprobrium and has gravely lowered him in the estimation of

professional colleagues, associates, family members, friends and members of the wider public.

Since the broadcast, our client has received numerous telephone calls, electronic messages and enquiries from professional colleagues, family members, associates, friends, well-wishers and members of the international community seeking clarification regarding the allegations.

The reputational injury occasioned by your statements has therefore been widespread, immediate and substantial. It is aggravated by the gravity of the alleged offences, the enormous sums mentioned, the reach of the original broadcast and the continued accessibility of the publication online.

Our Client's Demands

In view of the foregoing, we have our client's unequivocal instructions to demand as follows:

1. **An immediate and unequivocal public retraction** of all defamatory statements made by you concerning our client, to be delivered and published with substantially the same degree of prominence, reach and publicity as the original statements, within forty-eight hours of your receipt of this letter.
2. **A written and unreserved apology** addressed to our Client, expressly acknowledging that the allegations made by you were false and unsupported, and containing an unequivocal undertaking that you shall not repeat, publish or cause to be published the same or any similar allegations concerning our Client. The apology must be delivered within seventy-two hours of your receipt of this correspondence.
3. **A recorded public apology and retraction**, suitable for broadcast by Voice of the People and publication on all digital and social-media platforms on which the offending statements were disseminated.
4. **The immediate cessation of any further publication, repetition, endorsement or dissemination** by you of the defamatory allegations, whether orally, in writing, through social media, broadcast media or by any other means.
5. **Your immediate written request to Voice of the People** and every other platform or person within your knowledge or control to remove the offending programme,

excerpts and republications containing your statements from Facebook, YouTube and all other digital platforms.

6. **Written confirmation of full compliance** with the foregoing demands, together with copies or recordings of the retraction and apology, delivered to our Chambers at: **Ojukwu Chikaosolu & Co.**, No. 60, Gaborone Street, Wuse Zone 2, Abuja or electronically through: louisBectec@yahoo.com and/or ocandco.legal@gmail.com.

TAKE NOTICE that should you fail, refuse or neglect to comply fully with the foregoing demands within the stipulated periods, we have our Client's irrevocable instructions to commence appropriate legal proceedings against you, without further notice or correspondence.

In those proceedings, our Client shall seek, among other reliefs:

- a. Damages in the sum of **₦10,000,000,000.00 (Ten Billion Naira)** for defamation;
- b. Aggravated and exemplary damages arising from the gravity, recklessness and extensive dissemination of the publication;
- c. A perpetual injunction restraining you, your agents, associates and persons acting through you from further publishing, repeating or disseminating the defamatory allegations;
- d. A mandatory order compelling the removal of all recordings, excerpts and publications containing the defamatory statements from every platform upon which they appear;
- e. An order directing you to publish a public apology and retraction in terms and in a manner to be approved by the Court;
- f. The costs of the action; and
- g. Such further or consequential reliefs as the Court may consider appropriate.

Our client equally reserves the right to bring your conduct to the attention of the **Nigerian Bar Association** and the **Legal Practitioners Disciplinary Committee** for appropriate disciplinary action, particularly having regard to your status as a legal practitioner and the professional responsibility attendant thereto.

You are therefore advised to treat this letter with the utmost seriousness and urgency.

Please accept the assurances of our esteemed regards.

CHIKAOSOLU OJUKWU, SAN, MCI Arb(UK)

Principal Partner