

OJUKWU CHIKAOSOLU & CO.

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

REF: OC/ABJ/EXT/ /2026

27th July, 2026.

The Managing Director

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
PUBLICATIONS 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 (NNPC) and, most recently, as the **Commission Chief Executive** of the **Nigerian Upstream Petroleum Regulatory Commission (NUPRC)**. 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 on him at the **Global Sustainable Education and Leadership (G-SEL) Conference 2025**, held at the House of Lords, Palace of Westminster, United Kingdom by the International Business School of Scandinavia.

Throughout his illustrious public service career, our client discharged his duties with unquestionable integrity, probity, professionalism and without any modicum of impropriety. Having completed his tenure in public office, he has since resumed life as a private citizen and has never been indicted, charged or convicted in respect of any allegation of corruption or financial impropriety whatsoever.

The Offending Comments

It has, however, come to our client's attention that your organization, Voice of the People, recently aired and broadcast live to audiences across the world a programme in which you hosted one **Barr. Darlington Agomou**, who is reputed to be your in-house "Legal Analyst."

During the course of that programme, your guest made several scandalous, malicious, reckless and highly defamatory statements concerning our client. Specifically, he 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 way of innuendo, the foregoing words unequivocally convey to the reasonable listener that our client corruptly diverted, stole, looted and personally absconded with the staggering sums of **₦5 Trillion** and **US\$1.4 Billion** belonging to the Nigerian State and was deliberately allowed to escape accountability for those alleged acts.

We are informed by our client and we verily believe him that the said allegations are entirely false, malicious, reckless, baseless and unsupported by any credible evidence whatsoever. They were manufactured from thin air and presented to the public as though they were established facts.

For the avoidance of doubt, our Client has never been indicted by any investigative agency, never been charged before any court of law, and has never been convicted of any offence involving corruption, fraud, theft, embezzlement, financial misconduct or abuse of office, much less allegations involving the mind-boggling sums maliciously attributed to him by your guest.

Your organization nevertheless elected to broadcast these outrageous allegations to the public without undertaking even the most elementary journalistic due diligence to ascertain their veracity, verify the purported facts, seek documentary support or afford our client the elementary right of response before disseminating such damaging accusations.

The inevitable consequence of your broadcast is that the ordinary viewer and listener has been led to believe that our client is a thief, a looter of public funds, a corrupt public officer and a person who single-handedly stole sums approximating almost ten percent of Nigeria's 2026 national budget.

Your Organization's Violation of the Nigeria Broadcasting Code

Your conduct is not merely inconsistent with accepted standards of responsible journalism; it constitutes a clear infraction of the extant Nigeria Broadcasting Code (6th Edition) as amended.

In particular:

- a. Paragraph 3.3.1(a)** of the Nigeria Broadcasting Code mandates that every programme must be accurate and credible. The allegations aired against our client were presented to the viewing public as statements of fact without any evidential foundation whatsoever. No investigative report, forensic audit, judicial finding or official indictment was identified or produced in support of the extraordinary allegation that our client "went away" with **₦5 Trillion** and **US\$1.4 Billion**.
- b. Paragraph 3.3.1(b)** requires that all sides to an issue be equitably presented, preferably within the same broadcast. Your organisation neither contacted our client before the programme nor afforded him any opportunity to respond to, deny or explain the allegations before broadcasting them to a global audience. The programme was therefore manifestly one-sided, unfair and contrary to the elementary requirement of balance imposed by the Code.
- c. Paragraph 3.3.1(c)** guarantees a Right of Reply to every person or body with a genuine claim to misrepresentation. Our client undoubtedly falls within that category. Rather than proactively according him the opportunity contemplated by the Code, your organisation elected to continue disseminating the

defamatory programme through its online platforms, thereby compounding the injury to his reputation.

- d. Paragraph 3.3.1(e)** expressly requires broadcasters to ensure that all programmes comply with extant laws relating to, amongst others, libel. The publication complained of is *prima facie* defamatory, exposes our client to hatred, ridicule and contempt and is plainly inconsistent with the obligation imposed by the Code that broadcasts comply with the law of libel.

Furthermore, the Code requires broadcasters, where a mistake or misrepresentation has occurred, to implement the Right of Reply promptly and accord such reply the same prominence as the original broadcast. It equally contemplates appropriate corrective action by the broadcaster where necessary. Your continued publication of the offending material without correction or retraction is wholly inconsistent with these regulatory obligations.

The Damage to our Client's Reputation

The injury occasioned by these publications cannot be overstated. Our client has painstakingly built an impeccable professional and personal reputation over several decades of distinguished service to the nation. Your publication has exposed him to public hatred, ridicule, contempt, opprobrium and has gravely lowered him in the estimation of right-thinking members of society.

Indeed, since the broadcast, our client has continued to receive 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 these scandalous allegations.

The reputational damage inflicted upon our Client has therefore been widespread, immediate and substantial. We further observe that your liability has not ceased with the initial broadcast.

Rather, you have continued to publish and republish the defamatory material by maintaining the programme on various online platforms, including YouTube and Facebook, thereby ensuring that the defamatory statements remain continuously

accessible to viewers worldwide. In particular, the programme remains publicly available on Facebook at: <https://www.facebook.com/share/v/18zv5tN8KA/?mibextid=wwXIfr>, where it has continued to attract viewers, comments, shares and republication, thereby compounding the injury suffered by our client each passing day.

It is trite that every fresh access, publication, viewing and dissemination of defamatory material constitutes a continuing publication, thereby aggravating the damage occasioned to the reputation of the victim.

Your conduct constitutes a gross violation of established principles governing responsible journalism, media ethics and fair comment. No responsible media organisation ought to provide its platform for the dissemination of grave criminal allegations against a citizen without undertaking reasonable verification or affording the affected individual an opportunity to respond before publication.

Our Demands

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

1. An immediate public retraction of all the defamatory statements made concerning our client on your programme, such retraction to be published and broadcast with the same degree of prominence, reach and publicity as the original publication, **within forty-eight (48) hours** of your receipt of this letter.
2. A written and unreserved apology addressed to our Client, expressly acknowledging the falsity of the allegations, referencing the retraction and containing an unequivocal undertaking that neither your organisation nor its representatives shall publish or permit the publication of similar defamatory statements concerning our Client in future. This apology shall be delivered within **seventy-two (72) hours** of your receipt of this correspondence.
3. The immediate removal of the offending programme and every excerpt thereof from all platforms under your control, including but not limited to Facebook, YouTube and any other digital or social media platform through which the defamatory publication continues to be disseminated.

Evidence of compliance with the foregoing demands should be delivered to our Chambers at:

OJUKWU CHIKAOSOLU & CO.

No. 60, Gaborone Street,

Wuse Zone 2, Abuja.

or electronically via: louisbectec@yahoo.com or ocandco.legal@gmail.com.

TAKE NOTICE that should you fail, refuse and/or neglect to comply fully with these demands within the time stipulated, we have our client's irrevocable instructions to commence proceedings against your organisation and all other responsible persons before a court of competent jurisdiction without any further reference to you.

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

- a. Damages in the sum of **₦10,000,000,000.00 (Ten Billion Naira)** for defamation;
- b. Aggravated and exemplary damages;
- c. Perpetual injunctive reliefs restraining any further publication of the defamatory allegations;
- d. A mandatory order directing the removal of all offending publications from every platform upon which they appear;
- e. A public apology and retraction in terms to be approved by the Court;
- f. Costs of the action and all consequential reliefs.

Our client also reserves the right to petition the appropriate regulatory and broadcasting authorities to investigate your organization's conduct and to seek all sanctions available under the law for breaches of the applicable broadcasting and journalistic codes, including the withdrawal of your license.

Govern yourselves accordingly.

Accept the assurances of our warmest esteemed regards, please.

CHIKAOSOLU OJUKWU, SAN, MCI Arb(UK)

Principal Partner