Our Ref: A&C/RC/L- 08/07/2023 Friday, July 14, 2023

Mr. Ikechukwu Iroha,
Room 26, Felix Eshisanya Compound,
Umuakpu Umuohu Ndume
By Conoil,
Umudike Road,
Umuahia,
Abia State.

Dear sir,

## RE: MALICIOUS AND LIBELLIOUS PUBLICATION AGAINST KENNETH AHIA, SAN

# DEMAND FOR APOLOGY AND DAMAGES OF ONE BILLION NAIRA

We are solicitors to Mr. Kenneth Ahia, SAN, (hereafter referred to as "Our Client") on whose behalf and instructions we write this letter to you. He is hereinafter called our client.

Our Client's complaint relates to your Facebook post of July 10th 2023 titled "PAYMENT OF LEGAL FEES THROUGH CONTRACT AWARD?" wherein you published to the whole world that our Client is involved in a dishonest and spurious heist of fleecing Abia State under the guise of executing road construction contracts. As you well know, the said Facebook post enjoyed wide circulation and was read by numerous persons across the world, as you intended by the said publication.

In the said publication, you falsely wrote of and concerning our Client as follows:

"In what seems like an attempt at organized heist, Gov Otti has been caught up in another scandal involving award of road project contracts in Aba ...We have just received information that Mr Otti allegedly awarded all or most of these contracts to a company where his election petition tribunal lead counsel, Kenneth Ahia, SAN has major shareholding interest ...

The said offending post further stated as follows:

#### LEKKI LAW CENTER®

Jesus Arena, 'Kogun Chambers

Itedo / Freedom Way, Off Admiralty Way | Lekki Phase 1, Lagos - Nigeria.

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"Are these jobs meant to defray the cost of legal representation at the tribunal as the SAN, who is a major shareholder of Solberg and major stakeholders of Labour Party is in charge of all the labour candidates legal matters in Abia? Does the electoral law permit Otti to pay for legal services through spurious contract awarded to cronies and his personal lawyer..."

You further published that:

"The most scary (sic) implication of the above is that the cost of these jobs will likely be inflated to make up for the cost of these litigations which is allegedly the main consideration in awarding the fraudulent jobs."

By their ordinary and intended meanings, the above words published by you meant and were understood to mean that our Client is a person who lacks integrity, who is corrupt, fraudulent and or a co-plunderer of Abia State resources. The words also mean and were understood to mean that our Client is a pathetically dishonest man who is involved in professional misconduct and money laundering.

These words complained of, meanwhile, are false, untrue, and defamatory of and concerning our Client and were written maliciously to ridicule our Client and have him exposed to hatred, scandal, public odium, contempt, and similar feelings in the minds of persons who read the post. The post was also meant to besmirch his sterling public record, diminish his professional standing in Nigeria, amongst the legal community and elsewhere across the world.

You have dealt an invisible but serious dent and have also maliciously tarnished his hard-earned dignity and established reputation, appurtenant to his position as a Senior Advocate of Nigeria.

In consequence of this libelous publication, our Client has been exposed to public ridicule, opprobium and odium, as clearly indicated from the comments of some of those who read the post as contained on the same page as the post.

Our Client is an accomplished legal practitioner of repute, a responsible father, employer of labour and mentor to several persons who has served Abia State, Nigeria and his profession without blemish. He has earned international and local awards in his profession and for his selfless services to his community. He is currently the co-chairman of the Ethics and Privileges Committee of Lagos Branch of Nigerian Bar Association and therefore must not allow his reputation to be tarnished. Indeed,

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people of means and reputation who were our Client's friends have called him to express their dismay based on the post.

In all the circumstances, this post and or publication is reckless in the extreme, and without justification whatsoever and it is clearly actionable for defamation agasint our Client. You aggravated the damage done to our Client's reputation by showing no remorse when he reached out to you not to bring his name in to the political brick bats.

Our instructions are that you:

- a. Immediately **RETRACT** the offensive publication.
- b. **REFRAIN** forthwith from any further and or similar post or publication of and concerning our Client, in any manner whatsoever and howsoever.
- c. **PUBLISH** a full withdrawal and an unreserved **APOLOGY** in the same manner as the offensive post.
- d. Pay the sum of N1,000,000,000.00 to our Client through our office, as aggravated damages.

**TAKE NOTICE** therefore, that unless there is a full compliance with the above stated demands within 7 (seven) days from the date hereof, we shall proceed further with our Client's instructions to seek redress against you in court.

Yours faithfully,

Original Signed By:

EBUN-OLU ADEGBORUWA, SAN

EBUN-OLU ADEGBORUWA, SAN