CLINTON CONSULTANCY

9th Floor, Emporium Building, Movenpick Ambassador. Independence Avenue, Ridge, Accra, Ghana Tel: +233 27-252-2695 | Tel: + 233 55-630-9637 | 057 726 7008 |Email: info@clintonconsultancy.com www.clintonconsultancy.com

15th February 2021

Mrs. Sanja Anita Morrison The Managing Partner Morrison, Twumasi & Partners 12 Nii Armah Ollenu St, Airport West

DEMAND LETTER DEFAMATION

Dear Madam,

We are a firm of solicitors based in Accra that act for Chantel Kudjawu in connection with the identification and pursuit of identified instances of libelous statements across the internet. We have been made aware of the divorce petition your law firm filed on behalf of a client, Mrs. Gloria Arhin, on Wednesday 10th February 2021.

The allegation which will be the subject of a possible court action is in summary as follows: Paragraph 14(a) of your client's divorce petition filed in the High Court of Justice, was carried globally through the internet in the form of being published on online platforms from Thursday February 11, 2021 to date.

For ease of reference, paragraph 14(a) of the divorce petition states "Particulars of adultery: a. The Respondent has other women in his life with whom he has extramarital affairs, including one **Chantel Kudjawu (Gertrude Gbajo)** whom the Respondent continues to have extramarital affairs with."

Had your law firm undertaken even the most basic due diligence assessment as to the veracity of your client's assertion, you would have realized that she was just playing to the gallery and her statement was not true.

Our claim

Our client denies that she has ever engaged in the activities alleged by Mrs. Arhin. This defamatory statement has by the 15th February 2021 attracted thousands and thousands of comments, majority of which are negative and judgmental about my client despite the fact that she has not engaged in a sexual manner with Mr. Arhin.

Do note that our client is a principled and law abiding professional who works as a private investigator in Canada, with three children who does not compromise on the integrity and dignity of her marriage. She also has a Master's Degree in Political Science from a reputable University in Canada, and holds a Certificate from Harvard University.

Mrs. Arhin's defamatory words have meant that our client has been publicly ridiculed, scandalized and held in contempt by countless strangers in an unprecedented manner. This serious, untrue and highly defamatory statement towards our Client is malicious falsehood. Furthermore, this defamatory comment has been being communicated to thousands of people throughout the world, posing a serious threat to the reputation of our Client.

Legal proceedings

In order to protect our Client's interests, we are considering proceedings against Mrs. Arhin in the High Court. These proceedings would seek remedies including but not limited to the following:

- Substantial damages
- A perpetual injunction restraining Mrs. Arhin from further publishing any defamatory material about our client; and
- Costs

Next steps

Within 24 hours (from 10 am) of the date of this letter, we hope that Mrs. Arhin will be better advised to agree to do the following:-

- remove from her divorce petition in its entirety the defamatory statement to prevent further harm to our Client
- produce an apology and a declaration that the allegations referred to are false and defamatory and cause such apology to be published in an unqualified retraction and an apology on Ghanaweb, Yen, Facebook, Twitter, Instagram and Daily Graphic (online) with the same prominence the defamatory words received.

We await your response by return.

Yours faithfully,

AMANDA CLINTON ESQ.