



Law Office of E. L. Reid, LLC
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SPOLIATION / LITIGATION-HOLD NOTICE

May 2, 2026

Attention:

Mr. Samuel Okudzeto Ablakwa, in his personal capacity,
The Republic of Ghana,
The President of the Republic of Ghana, Mr. John Dramani Mahama, in his official capacity,
Foreign Minister, Mr. Samuel Okudzeto Ablakwa, in his official capacity,
The Embassy of the Republic of Ghana in the United States,
Counsel for the above-named parties,
And all agents and assigns thereof.

C/o:

Embassy of The Republic of Ghana
3512 International Drive NW
Washington, D.C. 20008

Notice of Publication Online:

For the benefit of providing proper notice to all possible parties involved in this matter, especially as it relates to this matter and to any defendants or their agents and assigns that have not been apprised of this matter, or have been transported or reassigned to other diplomatic posts, or have been deported by or in cooperation with Ghana, this letter has been posted online at: elreidesq.com/public-notices

Matter:

Fred Kwarteng d/b/a Travel Ghana / Secure Data Center v.
Foreign Minister Samuel Okudzeto Ablakwa (personal and official capacities);
The Republic of Ghana; The President of Ghana John Dramani Mahama (official capacity); and
The Embassy of the Republic of Ghana in the United States.

Venue:

U.S. District Court for the District of Maryland

Claims:

Defamation; Intentional Infliction of Emotional Distress (IIED); Fraudulent Misrepresentation;
Breach of Contract by Fraudulent Misrepresentation; Interference with First Amendment Rights;
Related Torts and Statutory Violations



I. PURPOSE OF THIS NOTICE

This letter serves as a formal litigation-hold and spoliation notice. You are hereby notified that actual litigation will soon be pending in the U.S. District Court for the District of Maryland involving the above-captioned parties. You are legally obligated to preserve all documents, data, communications, and electronically stored information (“ESI”) relevant to the claims and defenses in this matter.

Your preservation obligations arise under: Federal Rules of Civil Procedure 26, 34, and 37, Federal common law governing spoliation, The Foreign Sovereign Immunities Act (FSIA), 28 U.S.C. §§ 1602–1611, Local Rule 104.7 in the United States District Court for the District of Maryland, and applicable U.S. federal statutes governing electronic communications.

These obligations apply regardless of your perception of your sovereign status in this matter, and extend to all individual agents, agencies, ministries, and instrumentalities within your control.

II. SCOPE OF INFORMATION TO BE PRESERVED

You must preserve all materials—regardless of location, format, or custodian—that relate to or reference:

A. Defamatory Statements and Publications

- Statements made by Samuel Okudzeto Ablakwa, or individual agents of The Republic of Ghana concerning Fred Kwarteng, Travel Ghana, Secure Data Center, or any of their agents or assigns.
- Any publications, broadcasts, social-media posts, interviews, speeches, or digital content referencing Plaintiff.
- Drafts, edits, metadata, and internal communications regarding such statements.

B. IIED and Harassment-Related Conduct

- Communications evidencing intent, malice, recklessness, or knowledge of falsity.
- Internal discussions regarding targeting, discrediting, or harming Plaintiff and/or his businesses.

C. Fraudulent Misrepresentation and Contract-Related Materials

- Negotiations, agreements, proposals, or representations made to Plaintiff.
- Communications regarding business dealings, promises, or inducements.
- Records showing knowledge of falsity or intent to deceive.

D. Interference with First Amendment Rights

- Communications or directives concerning suppression, retaliation, intimidation, or interference with Plaintiff’s speech or business activities in the United States.
- Any involvement of Ghanaian governmental bodies or officials.



E. FSIA-Relevant Materials

- Documents showing the scope of official duties, authority, or governmental involvement.
- Communications between Ghanaian officials, ministries, or diplomatic personnel relating to Plaintiff.

F. All ESI and Physical Documents

This includes, but is not limited to:

1. Electronic Communications

- Emails (governmental and personal accounts)
- WhatsApp, Signal, Telegram, SMS, iMessage, or any similar messaging services employed by any and all defendants, or agents or assigns of defendants
- Facebook, Instagram, X/Twitter, TikTok, YouTube, LinkedIn messages, or any similar platforms that incorporate messaging services employed by any and all defendants, or agents or assigns of defendants
- Internal ministry communications, from any and all possible channels of communication
- Embassy communications with the Republic of Ghana or U.S. officials, or with the public, including but not limited businesses who provide(s/d) business services to the defendants

2. Digital Content and Metadata

- Social-media posts, comments, drafts, deletions
- Website content, edits, and server logs
- Audio/video recordings
- Cloud-stored data
- Device-stored data (phones, tablets, laptops, desktops)

3. Physical Documents

- Notes, memoranda, briefing documents
- Diplomatic cables
- Ministry or embassy files
- Contracts, agreements, and drafts

4. Third-Party Platform Data

You must take immediate steps to prevent deletion by:

- Meta (Facebook/Instagram)
- Google/YouTube
- X Corp.
- WhatsApp
- TikTok
- Any Ghanaian government IT systems
- Any personal devices used for official or unofficial communications



G. The Scope of Civil Discovery Is Broad in U.S. Courts

Under the Federal Rules of Civil Procedure, the defendant does not ultimately decide the scope of discovery. Although this notice is detailed and specific to this case, the scope of discovery in U.S. civil jurisprudence is all things that could reasonably be expected to lead to relevant and material information, and U.S. judges have the final say in making those determinations.

III. IMMEDIATE PRESERVATION ACTIONS REQUIRED

You must immediately:

1. Suspend any and all auto-delete functions on email, messaging apps, and servers.
2. Disable data-purge policies on government systems, embassy systems, and personal devices used for relevant communications.
3. Instruct all personnel—including aides, ministry staff, embassy staff, contractors, and IT administrators—to preserve all relevant materials.
4. Secure all devices used by any custodian.
5. Preserve all backups, including cloud backups and server logs.
6. Prevent overwriting of metadata, logs, and device histories.

Failure to take these steps may constitute **spoliation**, subject to sanctions under Fed. R. Civ. P. 37(e), including adverse-inference instructions, evidentiary preclusion, monetary sanctions, or default judgment. **Plaintiff will seek the complete range of damages recoverable in this action as permitted by law.**

IV. PRESERVATION OF GOVERNMENTAL AND SOVEREIGN MATERIALS

Several defendants are foreign sovereigns or officials. This notice applies to:

- Ministries, agencies, and instrumentalities of the Republic of Ghana
- The Office of the President of the Republic of Ghana
- The Embassy of the Republic of Ghana in the United States
- Any official or unofficial channels used by government personnel

FSIA does **not** excuse spoliation or failure to preserve evidence relevant to U.S. litigation.

V. CERTIFICATION OF COMPLIANCE

Within **14 days**, please provide written confirmation that:

1. This litigation-hold notice has been circulated to all relevant custodians.
2. All auto-delete and purge functions have been suspended.
3. All relevant ESI and physical documents are being preserved.
4. You have identified the individuals and departments responsible for preservation.



VI. CONTINUING OBLIGATION

Your preservation obligations are **ongoing**. If additional relevant information is discovered, you must preserve it immediately.

VII. CONTACT INFORMATION

All communications regarding this litigation hold should be directed to:

Counsel for Plaintiff

E. L. Reid, Esq.
Law Office of E. L. Reid, LLC
309 Lord Byron Lane, Apt 204
Cockeysville, MD 21030

VIII. METHOD OF SERVICE OF THIS LETTER

Plaintiff recognizes that the Foreign Sovereign Immunities Act, 28 U.S.C. § 1608, prescribes the exclusive methods by which service of process may be effected upon a foreign state and its political subdivisions, agencies, and instrumentalities, and further acknowledges that the Republic of Ghana is not a party to the Hague Service Convention or any comparable multilateral treaty governing the transmittal of judicial documents.

Accordingly, this correspondence is not tendered as service of process, nor is it intended to satisfy any statutory requirement under § 1608. It is transmitted **via certified mail solely for the purpose of providing formal notice of Plaintiff's preservation demands** and to ensure that all recipients are fully apprised of their independent obligations under United States law to preserve documents, electronically stored information, and all other materials potentially relevant to the pending litigation.

Sincerely,

E. L. Reid, Esq.
Law Office of E. L. Reid, LLC
309 Lord Byron Lane, Apt 204
Cockeysville, Maryland 21030
United States of America