


LORD & TEMPLE

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24th June, 2021

The Editor-in-Chief/Publisher
Daily Independent Newspaper
8, Wempco Road,
Ogba Ikeja,
Lagos State


Sandra
24/6/21

Dear Sir,

REQUEST FOR A RETRACTION, AN APOLOGY, AND PAYMENT OF DAMAGES FOR THE LIBELOUS PUBLICATION MADE OF AND CONCERNING THE PERSON OF HON. JAMES ABIODUN FALEKE IN YOUR PUBLICATION DATED JUNE 23, 2021 AND TITLED "GROUP CONDEMNS FALEKE OVER ALLEGED COMMENTS ON APC LEADERSHIP"

We are Solicitors to Hon. James Abiodun Faleke, a two-term Chairman of Ikeja Local Government, and a current member of the Federal House of Representatives representing Ikeja Federal Constituency, on whose instruction we write in relation to the above subject.

Our instruction is that in your publication of June 23, 2021, you made a libelous and defamatory statement of and concerning our Client, Hon. James Abiodun Faleke in the following terms:

"Recall that Asiwaju is the National leader of APC, his wife Oluremi is the Senator representing Lagos Central and her sister Lola Akande is the Commissioner representing Ikeja after having served as MHA for 3 terms. His daughter is the Iyaloja General of Lagos, his nephew, Damola represents Ikeja in the House of Assembly Const 2. Lai Mohammed, currently a Minister and a former Chief of Staff in Lagos state has his son representing Ikeja Const 1. Alhaji Tajudeen Olusi, the leading GAC member has his son as Chairman of Lagos Island L.G. Hon Oladele Ajomale's son was defeated at the general elections in 2015, if not, he

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would also have been a member of the State Assembly while his father was the sitting state chair of the party.”

Our Client has informed us that your publication is not only false and without factual basis but malicious in all material respect. It is by the reckoning of our Client, a deliberate attempt sponsored and/or designed to malign his image, political stature, and to cause rancour between the National Leader of the All Progressives Congress (APC), Asiwaju Bola Ahmed Tinubu, Jagaban Borgu, who is the benefactor of our Client, leaders of the party in Lagos State, and our Client.

The said libelous publication which is in relation to the recently conducted primary election of the APC for aspirants seeking to represent the party in the forthcoming Local Government Election in Lagos State is malicious, unfounded, and nothing but an attempt to create disaffection within the ranks of the APC in Ikeja Local Government and Lagos State in general.

We wish to state that our Client is a devoted member of the APC both in Lagos State and in the Federal Republic of Nigeria. He is a thoroughbred and loyal party stalwart, and a political son of the National Leader of the APC, Asiwaju Bola Ahmed Tinubu. Our Client will never make disparaging comments about his political godfather, Asiwaju Bola Ahmed Tinubu, his wife, Distinguished Senator Oluremi Tinubu, his family members, and leaders of the party in Lagos State to wit, Alhaji Lai Mohammed (the current Federal Minister of Information), Alhaji Tajudeen Olusi, and Hon Oladele Ajomale, all who our Client holds in esteem.

The emphasis on the political status of our Client in your publication i.e. LG chairman twice and now third time House of Reps member, is only a confirmation of our Client's conviction that the publication was sponsored by his political detractors. The intent of your publication is to cast unwarranted, unjustifiable, and unsustainable malicious aspersion on our Client's integrity in the eyes of right-thinking members of the public and your medium became a veritable tool for the achievement of their sinister purpose.

Our Client has consequently directed us to request for a retraction of the said publication within Forty Eight (48) hours and an apology to be published in two major newspapers and several online news outlets not later than Fourteen (14) days

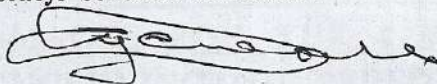
of the delivery of this letter, and also the payment of the sum of ₦3,000,000,000.00 (Three Billion Naira) as damages for the malicious publication against our Client.

TAKE NOTICE that if you fail to heed the request of our Client within Fourteen (14) days of the receipt of this letter, we shall be constrained to proceed to the court of law against your organisation for exemplary damages for injurious falsehood and malicious publication made of and concerning our Client.

Thank you.

Yours faithfully

PP: Lords and Temple
Attorneys*Solicitors*Arbitrators



Gboyega Oyewole, SAN

