

29th October 2026

**By Email: momohjimah8@gmail.com
info@naijaonpoint.com.ng**

By WhatsApp No: +44(738)9673342

The Publisher/Editor-in-Chief,
NaijaOnPoint/NOP Media Ltd
14, Universal Street,
Off Medical Stores Road,
Benin City,
Edo State.

Dear Sir/Madam,

CEASE AND DESIST DEMAND: UNLAWFUL PUBLICATION OF DEFAMATORY ARTICLE CONCERNING THE PERSON OF PROFESSOR FOLASHADE TOLULOPE OGUNSOLA (VICE CHANCELLOR OF UNIVERSITY OF LAGOS)

We are Solicitors to Professor Tolulope Ogunsola FAS, CON ("our Client") and write on her express instructions in respect of your publication titled "*Citadel of Criminals: Under VC Folashade Ogunsola, UNILAG Staff Pocketed N397million In Irregular Payments While N434million In Cash Advances Went Unretired*", accessible via the following link: <https://x.com/naijaonpoint/status/2113920439349117419?s=46> which was published on your website: NaijaOnPoint.com, X's account (formerly known as Twitter) @NaijaOnPoint and LinkedIn Account with Profile Name: NaijaOnPoint.

Our Client has drawn our attention to your said publication, which associates her name and office with allegations of substantial financial irregularities at the University of Lagos. The publication further attributes direct responsibility to our Client, for alleged financial infractions by some unidentified staff of University of Lagos.

In their natural and ordinary meaning, the headline and content of your said publication conveys to the ordinary reasonable minded reader that our Client presides over and condones the misappropriation of public funds. Your said publication was designed to convey and did convey the false impression, that our Client is a fraudulent and dishonest Chief Executive who also presides over the affairs of a University that is populated by criminals.

For avoidance of doubt, our Client does not object to legitimate investigative journalism, fair comment or responsible reporting on matters of public interest. However, our Client takes serious exception to baseless allegations and unverified conclusions (as established facts) which unjustifiably injures her well earned and richly deserved reputation.

Our Client categorically denies allegations or insinuations of having been engaged in, authorized, participated in, or knowingly facilitating criminal conduct and/ financial impropriety. Our Client maintains that the publication is materially false, misleading, malicious and gravely injurious to her personal and professional reputation.

Kindly be reminded that under Nigerian Law, the publication of false and unverified statements that lower a person's standing in the estimation of right thinking members of society will trigger an actionable tort of libel. Further, by virtue of Section 24 of the Cybercrimes (Prohibition, Prevention, Etc) Act (as amended), the intentional transmission of false messages intended to cause breakdown of public order, annoyance, or damage to reputation attracts criminal sanctions.

In view of the foregoing, we have our Client's instruction to demand and we do hereby demand, that you immediately take the following steps within 48hours of receipt of this Letter;

- i. Immediately remove and disable access to the impugned publication across your website, social media platforms and every other medium under your control.
- ii. Publish an unequivocal retraction and apology to our Client, with prominence and visibility comparable to the original publication.
- iii. Cease and desist from further publishing, reproducing, circulating or republishing the defamatory allegations concerning our Client.
- iv. Provide a written undertaking that the offending allegations will not be published and that appropriate corrective measures will be taken to prevent any republication by your organization.

TAKE NOTICE THEREFORE that failure to comply with the above demands within the stipulated period will leave our Client with no other alternative but to institute legal proceedings against you, your organization and any other person responsible for the circulation of the defamatory and maliciously injurious publication, without further to your company. Our Client would also refer the matter to the appropriate law enforcement agency for investigation and appropriate criminal prosecution.

AND TAKE FURTHER NOTICE that at the expiration of 48hours of the receipt of this Letter, based on our standing instruction, we shall commence a civil Suit against your Company and persons responsible for the publication claiming the following reliefs:

- (1) A DECLARATION that the Defendant's publication titled "*Citadel of Criminals: Under VC Folashade Ogunsola, UNILAG Staff Pocketed N397million In Irregular Payments While N434million In Cash Advances Went Unretired*" published on the Defendant's website is defamatory and maliciously injurious of the Claimant.
- (2) A MANDATORY ORDER directing the Defendant to pull down and delete the offending publication concerning the person of the Claimant which is presently posted on the Defendant's website and social media platforms.

- (3) Sum of N500,000,000.00 (Five Hundred Million Naira) being general damages for defamatory and injuriously false publication made by the Defendant against the person of the Claimant.
- (4) The sum of N500,000,000.00 (Five Hundred Million Naira) being exemplary damages for defamatory and injuriously false publication by the Defendant against the person of the Claimant.
- (5) PERPETUAL INJUNCTION restraining the Defendant from further publishing of the defamatory and/or maliciously false statements on her website or social media platforms against the person of the Claimant.

We trust that you will treat this Letter of demand with the urgency and seriousness it deserves by taking appropriate steps.

Yours faithfully,
FOR: BAYO OSIPITAN AND CO.

PROF. TAIWO OSIPITAN SAN, FC Arb, FNIALS

