



Femi Atoyebi & Co.
SOLICITORS & NOTARIES

September 25, 2019

The Managing Director
Google Global Services Nigeria Ltd
39 Alfred Rewane Rd
Ikoyi, Lagos

Original copy received by me.
L. O. Igabari
25/09/19

Dear Sir,

PRE-ACTION NOTICE - DEFAMATION OF HIS EXCELLENCY, PROF YEMI OSINBAJO, SAN IN THE YOUTUBE/ONLINE PUBLICATION OF SEPTEMBER 20, 2019

We are solicitors to His Excellency, Prof. Yemi Osinbajo, SAN (*our Client*) on whose instruction we write in connection with the publication/broadcast disseminated through a YouTube account/platform.

It is our understanding that you have provided a platform through which an account holder named RootsTV Nigeria, an online news platform that is available through this link <https://www.youtube.com/watch?v=pl1xPwC6aUE> (last accessed as at September 24, 2019) is able to continuously broadcast defamatory contents. In the broadcast published on the account of RootsTV Nigeria on September 20, 2019, the following incorrect statements and untruths were made:

- a. Our Client was stacking up public funds from agencies directly under his supervision, with a strong insinuation that the Federal Inland Revenue Service (FIRS) was the principal organ by which the alleged fraud was perpetrated.
- b. Our Client was unable to explain the alleged imbalance and discrepancies on the account of the FIRS on the interrogation of the Chief of Staff to the President, Mr. Abba Kyari.
- c. Our Client was unable to explain the alleged failed disbursement to all beneficiaries under the Social Investment Programme of the Federal Government in Adamawa State.

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Ack

This entire broadcast is ill-founded, false and untrue. The Publication is undoubtedly a barefaced attempt to unfairly discredit and expose our Client to contempt and ridicule in the estimation of right-thinking members of the society.

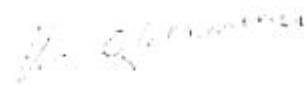
Since causing the publication to be published on your platform, our Client has been inundated with the barrage of telephone calls from professional and personal acquaintances; all shocked and disappointed by our Client's alleged activities referenced in the said publication. Our Client is a public officer and entrusted by the Constitution of the Federal republic of Nigeria to perform functions that require explicit and implicit trust from the public. The publication on your platform is mischievously calculated to erode that trust. It suffices to state that the false and malicious publication has occasioned injury and reputational damage to our Client.

As you may be aware, our Client has built his reputation as a distinguished scholar, legal practitioner and clergyman. In recognition of his distinction in legal practice, our Client was elevated to the highly coveted rank of a Senior Advocate of Nigeria in 2002. Prior to becoming the Vice President in 2015, he had meritoriously served as a distinguished Attorney General of Lagos State for eight years. In his decades in private and public services, never was there any time that he has been linked with any act of corruption. It is therefore an untruth that our Client was illegally stacking monies for agencies to finance his alleged 2023 presidential ambition.

Our Client therefore demands that you immediately remove and/or suspend the publication/broadcast of the defamatory publication on the account of RootsTV Nigeria on the platform of YouTube. Please note that if Google fails, refuses or neglects to remove the publication immediately, we will be compelled to consider legal options open to our Client.

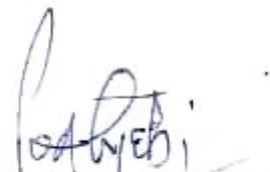
Thank you.

Yours faithfully,



Osaro Eghobamien, SAN
Perchstone & Graeys LP

Managing Partner



Femi Atoyebi, SAN
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Managing Partner



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