

FUNMILAYO OLANREWAJU (As generated by truecaller) 10th of June, 2026
(AKINTAYO MEDIA TEAM)
08033112242.

Dear Sir/Ma,

**DEMAND FOR PUBLIC APOLOGY AND RETRACTION OF YOUR
DEFAMATORY PUBLICATION AGAINST MAYOR DELE
OSHINOWO(MDO); PRE-ACTION NOTICE**

We are Solicitors to Hon. Mayor Oladele Oshinowo (hereinafter "our Client"), on whose express instruction we write.

It is our brief that you authored, published, and/or actively circulated a document titled "A Call for Order, Unity and Respect within APC Kosofe Federal Constituency" containing the following false, malicious, and defamatory statements against our client:

- I. That our client "embezzled" funds during his tenure as chairman. for ease of reference, your exact words are hereby reproduced;

*"He appears to believe that the money he **EMBEZZLED** from being chairman will help him get APC ticket for House of Reps....."*

- II. That our client "hijacked" and disrupted the APC primary election of 16th May 2026 and "declared himself winner" of an election that never held, your exact words are hereby reproduced;

*"They came out en masse to vote but Hon. Mayor Oladele Oshinowo (MDO) **DISRUPTED** the whole*



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election and **HIJACKED** the primaries. NO ELECTION TOOK PLACE IN KOSOFE and subsequently **DECLARED HIMSELF** the winner of the primary election that never took place”.

III. That our client engaged in "land-grabbing" and unlawful demolition of properties, your exact words are hereby reproduced;

*“he was busy **DEMOLISHING PROPERTY AND GRABBING LAND** across Agboyi Ketu, and living an extravagant lifestyle, while abandoning the good people of Agboyi....”*

IV. That our Client sponsored an opposition (NNPP) candidate against the APC in the 2023 general elections, your exact words are hereby reproduced;

*“Please note that this Dele Osinowo was one of the people who **SPONSORED NNPP CANDIDATE** Abdulwaheed odunnuga during the 2023 House of Representatives elections”.*

V. That our client is engaged in "bribery" and the spreading of falsehoods. your exact words are hereby reproduced;

*“..running helter-skelter **BRIBING PEOPLE** all over ...”*

All of the above allegations are false, malicious, and without any foundation in fact. They were made with the clear and deliberate intent to damage our client’s hard-earned reputation, harass, bully, intimidate him, and to undermine his political standing within the All Progressives Congress and among the good people of Kosofe Federal Constituency.

We are not unmindful of the right to freedom of expression as enshrined under section 39 of the 1999 constitution of the Federal Republic of Nigeria (as amended), It is, however, trite law that this right does not extend to the publication of falsehoods that are calculated to injure the reputation of another. The Supreme Court of Nigeria has affirmed, in a long line of authorities, that libel being a



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defamatory statement made in a permanent or written form is actionable per se; that is, the law presumes damage in favour of the claimant upon proof of publication to a third party, without more. The wide circulation of your publication to party leaders and members of the public within Kosofe Federal Constituency plainly satisfies the element of publication recognized by the Supreme Court in ***Standard Chartered Bank (Nig.) Ltd. v. Ameh (2022) 15 NWLR (Pt. 1854) 559*** and the classic exposition in ***Sketch Publishing Co. Ltd. v. Ajagbemokeferi (1989) 1 NWLR (Pt. 100) 678***, which sets out the elements of defamation recognized in Nigerian jurisprudence.

Taken in their ordinary meaning, your statements impute embezzlement (a criminal offence), electoral fraud, land-grabbing, financial corruption, and partisan treachery to our client, each of which, individually and collectively, lowers him in the estimation of right-thinking members of society and exposes him to hatred, ridicule, and contempt. No defence of justification, fair comment, or qualified privilege is available to you on the facts of this matter, particularly given the plainly malicious tone and purpose of the publication.

In light of the foregoing, we hereby demand that you, within SEVEN (7) DAYS of receipt of this letter:

- a) IMMEDIATELY cease and desist from further publishing, circulating, repeating, or causing others to publish the said defamatory statements in any form.
- b) Issue and publish an UNRESERVED PUBLIC APOLOGY to our client in the same platforms and channels through which the offending publication was disseminated.
- c) RETRACT, completely and publicly, every false allegation contained in the said publication.
- d) Furnish our office with a written UNDERTAKING that you will not, directly or through your agents, make further defamatory



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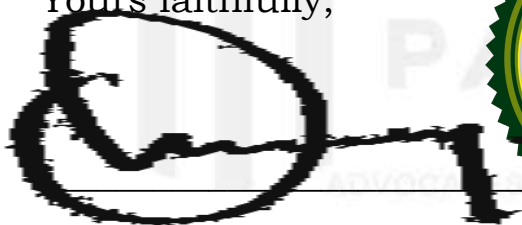
statements, engage in cyberstalking, or take any action intended to harass or intimidate our client.

Take notice that failure to comply with the above demands within the stipulated time shall leave our Client with no option but to:

- (i) Institute civil proceedings against you for general and aggravated damages for libel, without further notice;
- (ii) Report your conduct to the Nigeria Police Force for criminal prosecution under the applicable statutes;
- (iii) File a formal complaint under the Cybercrimes Act, 2015 with the Nigeria Police Force Cybercrime Unit.

We trust that the gravity of the legal exposure you face is not lost on you and that you will act swiftly and responsibly in compliance with the foregoing demands.

Yours faithfully,



A.A OLOYEDE, ESQ



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