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24th January, 2025

TO MESSRS:

- i. **THE INTEGRITY YOUTH ALLIANCE, ABUJA**
Suite 2/3, 5th Floor, Merit House, 22 Aguiyi Ironsi
Street, Maitama, Abuja.
- ii. **TROJAN INSIGHT NEWS**
- iii. **SAHARA REPORTERS MEDIA GROUP**

Dear Sirs,

**DEMAND FOR RETRACTION OF DEFAMATORY STATEMENTS
MADE AGAINST DCP SIMON LOUGH, SAN, IN THE PETITION
DATED 6TH JANUARY, 2025 WHEREIN THE DCP SIMON LOUGH,
SAN WAS LISTED AMONG THE POLICE PERSONNEL THAT
ENGAGED IN UNETHICAL PRACTICE OF BACKDATING THEIR
HISTORY RECORDS**

1.1. **INTRODUCTION**

1.2. We are instructed by **DCP SIMON LOUGH, SAN** ("Our Client"), a Deputy Commissioner of Police and the first police officer in Nigeria elevated to the rank of Senior Advocate of Nigeria (SAN) in 2021 and we have his instructions to write this Letter.

1.3. Our Client's attention has been drawn to the above referenced story, to wit: **NAMES OF POLICE PERSONNEL THAT ENGAGED IN UNETHICAL PRACTICE OF BACKDATING THEIR HISTORY RECORDS** and which has been published by different online media houses; like the *TROJAN INSIGHT* which tagged the defamatory statement thus: **"SIMON LOUGH, NIGERIA POLICE LEGAL HEAD, OTHERS UNDER INVESTIGATION FOR BACKDATING RECORDS TO DELAY RETIREMENT."** published online on the 19th January, 2025 via - <https://trojaninsights.com/simon-lough-nigeria-police-legal-head-others-under-investigation-for-backdating-records-to-delay-retirement/>

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- 1.4. The Sahara Reporters also headlined the defamatory statement as: **Simon Lough, Nigeria Police Legal Head, Others Under Investigation For 'Backdating Records To Delay Retirement'** via <https://saharareporters.com/2025/01/19/simon-lough-nigeria-police-legal-head-others-under-investigation-backdating-records>.
- 1.5. It is our client's express instruction that the above captioned story as it relates to him at the material time is false.
- 1.6. Our Client was born 14th of May, 1969. He joined the Police as a Cadet ASP on the 1st of May, 2000.
- 1.7. Our client was never enlisted into the Nigeria Police Force on January 8, 1987 and therefore could not have retired on January 8, 2022 as maliciously published by you, with the intention to besmirch his reputation.
- 1.8. You published the defamatory and injurious story against our client without seeking his side of the story in accordance with the media principle and ethical responsibility of news balancing.
- 1.9. The defamatory statements which are as published by you on the 6th January, 2025 goes thus:

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Suit 2/3, 5th Floor, Merit House, 22 Aguiyi Ironsi Street, Matama. Abuja
08166240846, 08123608662
Integrityyouthalliance2015@gmail.com

IGP Olukayode Adeolu Egbetokun, PhD, NPM,
2025

Inspector General of Police.
Louis Edet House,
Shehu Shagari W
Abuja.

6th January,

Dear Sir,

Names Of Police Personnel That Engaged In Unethical Practice Of Backdating Their History Records

It is pertinent to note that "Force Entrant" is a scheme by the Nigeria Police Force where deserving officers with requisite educational records are upgraded

to a higher cadre after a brief training period at the Police Academy or at any approved Police College, and as such, it is not a fresh appointment.. Essentially, this implies that the service duration of such officers continues counting and does not automatically restart.

Therefore, according to the Public Service Rules (7 Rule 020810 of Chapter two), the under-listed, having served in the public service and received salaries as required by law, cannot remain in service beyond the legally permitted period.

Regarding our letter dated 30th December 2024, below are some of the names of police personnel who engaged in the unethical practice of backdating their history records:

- 1) AIG Abdul Yari*
- 2) AIG Idowu Owohunwa*
- 3) AIG Ben Igwe*
- 4) CP Peter Ukachi Opara*
- 5) CP Obo Obo Ukani*
- 6) DCP Simon Asamber Lough (SAN)*
- 7) ACP Akpan Brown*

2.1.No doubt, by way of direct express statements and innuendoes in the above defamatory and injurious statements in your publication against our client, you have recklessly and maliciously, maligned with impunity the name and reputation of our client without any basis or justification and without making effort to hear our client's side of the story before publication of the defamatory statements against our client to the world. The obvious implication of the imputation in the above statements published against our client by different media Houses like *Sahara Reporters* and *Trojan Insight* is to taint our client with allegation of cheating, corruption, fraud and lack of integrity. These allegations are serious, damaging and highly defamatory when there is no factual basis for such malicious publication. The publication ridiculed our client's untainted integrity, which he has worked so hard to build over the decades. By the reckless, ill-conceived, offensive and libelous publications in your Letter of 6th of January, 2025, you portrayed our client as:

- (i) A dishonest legal practitioner and Senior Advocate of Nigeria who has no integrity.
- (ii) A morally bankrupt lawyer and Senior Advocate of Nigeria, who is totally lacking in transparency and accountability.

- (iii) An unscrupulous public officer who habitually betrays his oath of office and cannot be entrusted with ethical responsibilities.
- (iv) A man of unfit and unworthy character to hold public office.
- (v) A public officer who destroys public confidence in the government.
- (vi) A selfish public officer who maneuvers the system for his own interest
- (vii) A fraudulent and lawless lawyer and public officer who has no regard for rules and regulations guiding his official conducts;

2.2. Since these malicious and defamatory publications, our client has been completely disorientated and traumatized as he has been receiving calls from different quarters, especially those who know him as a man of impeccable integrity, a renowned legal practitioner and Senior Advocate of Nigeria. Our client considers these false, defamatory and malicious statements published in the letter to the Inspector General of Police Olukayode Adeolu Egbetokun, **“Names Of Police Personnel That Engaged In Unethical Practice Of Backdating Their History Records”** by the Integrity Youth Alliance and published by *Sahara Reporters* and *Trojan Insights* as a way to manipulate the unsuspecting public and surreptitiously turned our client into a villain while making huge commercial gains at the expense of our client’s reputation which is global.

3.1. RELIEFS/REMEDIES TO BE SOUGHT IN COURT:

3.2. We have our client’s instructions to institute an action against you at the appropriate Court, seeking the following reliefs:

- (i) The sum of N 1,000,000,000.00 (One Billion Naira) being damages jointly and severally for the libelous publications against DCP SIMON LOUGH, SAN as contained in the Letter **“Names Of Police Personnel That Engaged In Unethical Practice Of Backdating Their History Records”** dated 6th January, 2025.
- (ii) An order directing the Defendants to retract the libelous publications and tender an unreserved apology to DCP SIMON LOUGH, SAN in three National Newspapers with wide circulation in Nigeria;

- (iii) An Order stopping forthwith further production/publication and circulation of the defamatory publication made in the letter dated 6th January, 2025 and published by *Sahara Reporters* and *Trojan Insight* on their websites on the 19th of January, 2025
- (iv) An order of injunction restraining the Defendants from repeating or engaging in a similar publication against DCP SIMON LOUGH, SAN.
- (v) An order compelling the Defendants to pay Claimant's Counsel fees in the sum of N100,000,000.00 (One Hundred Million Naira) being the cost of prosecuting the suit.

4.1. PROPOSAL FOR SETTLEMENT:

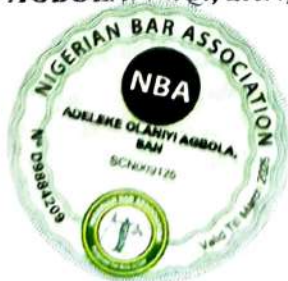
- i. Our client is open to amicable settlement of this matter, and is prepared to shelve the impending action if your good selves and your company meet the following demands on or before the 15th day of February, 2025:
- ii. All the Defendants shall publish a retraction of the subject defamatory words in three National Newspaper with wide circulation in Nigeria not later than 15th day of February, 2025. The text of the retraction to be agreed with our Law Firm in writing;
- iii. All Defendants shall tender an unreserved apology to our Client and publish same conspicuously in three National Newspapers with wide circulation in Nigeria not later than 15th day of February, 2025. The text of the apology to be agreed with our Law Firm in writing;
- iv. All Defendants shall give an undertaking to refrain from further similar publications against our Client;

5.2 Please note that you all have a period 10 days to respond to this letter and our proposal for settlement.

Please accept our highest professional esteem.

Yours faithfully,


ADELEKE.O. AGBOLA, FSO., SAN, FCARB




OBIORA OKENCHI, ESQ.

