



# ANTHONY EYO & ASSOCIATES

(Legal Practitioners)

Chief Anthony A. Eyo, LL.B. (Hons.) BL  
(Head of Practice)  
Emmanuel Eyonsa Esq. LL.B. (Hons.) BL  
Elder ImeAnsa, Esq. LL.B. (Hons.) BL  
Patrick M. Akpan Esq. LL.B. (Hons.) BL

## Seat of Wisdom Chambers

#100 Dan Archibong Street (formerly White House)  
(by #44 Wilkie Street), Calabar  
Cross River State - Nigeria  
Phone: +2348038334844, +2348189353985  
Email: anthonyeyoandassociates@yahoo.com

30<sup>th</sup> September, 2020.

The Registrar,  
Trinity College of Nursing and Midwifery  
Otukpo-Enugu Road,  
Olongbecho-Ekeh,  
Okpokwu Local Government Area,  
Benue State.

Sir,

**DEMAND FOR A WRITTEN APOLOGY AND IMMEDIATE RETRACTION, CESSATION AND DESISTENCE FROM THE OFFENSIVE OUTDOOR ADVERTISEMENT FOR ADMISSIONS INTO TRINITY COLLEGE OF NURSING AND MIDWIFERY OKPOKWU, BENUE STATE PURPORTING TO BE IN AFFILIATION WITH ARTHUR JARVIS UNIVERSITY, AKPABUYO, CROSS RIVER STATE.**

We write as Solicitors to Arthur Jarvis University, Akpabuyo, Cross River State hereinafter referred to as our client. Our client is a private institution of higher learning duly approved, accredited and licensed by the National Universities Commission to operate as an educational institution in Cross River State.

Sometime in June, 2020, our client's attention was drawn to an outdoor advertisement for admission into Trinity College of Nursing and Midwifery, Okpokwu, Benue State purporting same to be in affiliation with Arthur Jarvis University, Akpabuyo, Cross River State. The purported offensive advertisement was made without the prior knowledge and/or consent of our client.

In reaction to the purported advertisement, our client published a Public Notice dated 15<sup>th</sup> June 2020 to the general public and the Nursing and Midwifery Council of Nigeria disclaiming any affiliation or any other relationship with Trinity College of Nursing and Midwifery, Okpokwu, Benue State and the same was communicated to the Registrar of the aforesaid College.

Unfortunately, in utter disregard to the disclaimer published by our client, Trinity College of Nursing and Midwifery proceeded to issue Letters of Offer of Provisional Admission into Trinity College of Nursing and Midwifery, Okpokwu, Benue State to various persons for Bachelor Degree Programme in Nursing Science for the 2020/2021 Academic Session purporting same to be in affiliation with our client's University without the prior knowledge, approval and consent of our client. Our client is in possession of these letters signed and issued by a certain Dr. Adah Francis John after extorting the sum of N13,000.00 (Thirteen Thousand Naira) from each of these persons.

We advise, that the aforesaid advertisement for admission and the admission letters issued by Trinity College of Nursing and Midwifery, Okpokwu, Benue State purported to be in affiliation with our client's University is tantamount to a false representation calculated to deceive, induce and defraud the general public, particularly candidates seeking admission into the University, under the pretext of offering them admission using the registered and patented name of our client's University.

We state emphatically that our client is a responsible and law abiding corporate citizen and the unlawful and criminal acts perpetuated by Trinity College of Nursing and Midwifery has caused our client to suffer a heavy embarrassment, injury, goodwill and loss of integrity as a result of the negative perception by the general public capable of causing the blacklisting of our client as an academic institution and a possible withdrawal of our client's operational license by the National Universities Commission.

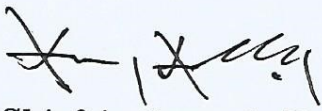
In total consideration of the foregoing, we have our client's instructions to strongly demand unequivocally as follows:

- (a) A retraction of the aforesaid offensive advertisement for admission to be published in all media types including, but not limited to the internet, print, broadcast and outdoor media;
- (b) A total cessation and desistence from any form of advertisement, publication and issuance of any documents in relation to the offer of admission purportedly as an affiliate of our client's University; and
- (c) A letter of apology addressed to our client and copied to the National Universities Commission and the Nursing and Midwifery Council of Nigeria to be published in four national dailies circulating within Nigeria preferably The Guardian, This Day, The Nation and Punch Newspapers.

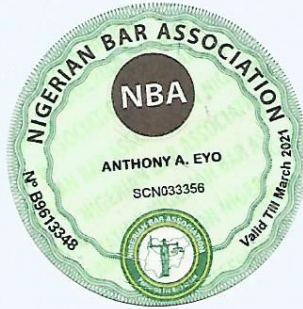
**TAKE NOTICE** that, in the event of your failure to comply with our client's demands within seven (7) days of the service of this letter on you, we have our client's firm instructions to commence legal proceedings against Trinity College of Nursing & Midwifery, Okpokwu, Benue State for passing-off as well as obtaining punitive damages for the injuries suffered by our client. We shall also not hesitate to lodge a criminal complaint against the College to the Nigeria Police Force for fraud in addition to reporting this misconduct to the Nursing and Midwifery Council of Nigeria.

Be advised accordingly!

Yours Faithfully,



Chief Anthony A. Eyo



- Cc:
1. The Executive Secretary,  
National Universities Commission,  
Aja Nwachukwu House,  
No. 26, Aguyi Ironsi Street,  
Maitama District  
Federal Capital Territory – Abuja.
  2. The Registrar/Secretary General,  
Nursing And Midwifery Council of Nigeria,  
733, Cadastral Way,  
Gwarimpa,  
Federal Capital Territory – Abuja.