



# DAPO AKINTOMOWO & CO.

(SOLICITORS, ADVOCATES & LEGAL CONSULTANTS)

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Tel: 08157712118

Our Ref: \_\_\_\_\_

Your Ref.: \_\_\_\_\_

Date: 10-02-2026

TO

**OLUYEMI A. OGUNLEYE ATTORNEYS  
(EI CHAMBERS)**

**PORT HARCOURT OFFICE:  
KM 3 SIR CELESTINE OMEHIA ROAD (SARS ROAD),  
OPPOSITE SKYEACH FILLING STATION,  
PORT HARCOURT, RIVERS STATE.**

**SOLICITORS TO:**

**MR. RAYMOND UCHE  
HOST AND PRODUCER, "TOOHEALTHTALK" PODCAST  
VIA SOCIAL MEDIA / ELECTRONIC SERVICE**

Dear Sir,

**RE: RESPONSE TO ALLEGATIONS OF DEFAMATORY PUBLICATION AGAINST  
MR. RAYMOND UCHE HOST OF "TOOHEALTHTALK" PODCAST**

We are Solicitors to **MR. GIRMA NASIR**, also known as "**NURSE\_GIRMA**" on TikTok, (hereinafter referred to as "*our Client*"), and we write on his firm instructions.

At the outset, it is necessary to situate this matter within its proper legal and factual context. Your client is not a medical practitioner, nor is he subject to regulation by any statutory healthcare body. Notwithstanding this, he elected to host, produce, and disseminate a podcast episode addressing "**auxiliary nursing**" in Nigeria. A subject that squarely implicates patient safety, statutory regulation, and criminal liability for unlicensed medical practice.

Prior to the publication of our client's response video, your client was privately and respectfully contacted, not only by our client but by several licensed nursing professionals duly registered with the Nursing and Midwifery Council of Nigeria. These professionals, who have undergone the rigorous training prescribed by law, expressed grave concern that the podcast episode misrepresented the legal position, trivialised professional standards, and presented an unlawful practice in a favourable and reassuring light. Your client was politely requested to either take down the Hiii episode or issue a correction. He declined.

Against this background, our client's public commentary was neither reckless nor malicious. It was a measured response issued in the interest of public health education after private warnings were ignored. For the avoidance of doubt, the legal status of "auxiliary nursing" in Nigeria is not a matter of opinion or professional rivalry; it is a matter of settled law and public record. As reported by **Punch Newspaper on 1 October 2023**, ***"Auxiliary nurses have no place within Nigeria's healthcare system and laws, legal experts, nursing and medical professionals have insisted."*** The same publication further stated, quoting the **National Association of Nigeria Nurses and Midwives (NANNM)** ***"We wish to clarify that the term 'Auxiliary Nurse' has no place within Nigeria's healthcare system or its laws. An individual is either a qualified nurse or an unqualified individual performing tasks beyond their competence."*** And unequivocally, **"A nurse or midwife is either registered by the Nursing and Midwifery Council of Nigeria, or the person is a quack."**

These are not our client's words; they are the words of Nigeria's leading nursing authority as reported in a widely circulated national newspaper. The statutory position is even clearer. **Section 21 of the Nursing and Midwifery (Registration, Etc.) Act provides, *"It shall be an offence for any person without the approval of the Minister, given on the recommendation of the Council, to train or purport to train any person as a nurse or midwife..."***

The Act criminalises unauthorised training and, by necessary implication, unauthorised holding out. There is no statutory category known as "auxiliary nurse" recognised under Nigerian law.

It is therefore particularly troubling that, in the podcast episode in question, your client repeatedly addressed and presented the guest as a "nurse" despite her not being registered or licensed by the Nursing and Midwifery Council of Nigeria at the material time. The use of the protected professional title **"nurse"** in this context goes beyond casual description and enters the realm of misrepresentation and impersonation, which the law expressly seeks to prevent in order to protect the public.

Further, your client's platform allowed statements to the effect that auxiliary nurses **"fill loopholes left by registered nurses"** and also, that **"they are necessary because hospitals allegedly cannot afford qualified nurses."** With respect, such assertions do more than narrate personal experience. They normalise and justify an unlawful practice and risk misleading members of the public into believing that unlicensed nursing is acceptable, necessary, or endorsed. That risk is precisely what prompted our client's intervention.

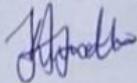
Our client did not publish any false statement of fact concerning your client. His comments were directed at the conduct being promoted and the illegality of the practice being platformed, not at your client's personal life or moral character. Any reference to alleged criminality was expressly tied to unlicensed nursing practice and the promotion thereof, conduct which the law itself treats as unlawful. This constitutes fair comment on a matter of public interest, made in good faith, following ignored private warnings.

Defamation law in Nigeria does not exist to immunise public platforms from criticism where matters of public health, legality, and patient safety are concerned. Public sensitisation on unlawful medical practices does not become defamatory merely because it is uncomfortable or commercially inconvenient.

In the circumstances, your demand for a takedown and apology is misconceived. On the contrary, our client formally calls on your client to immediately take down the episode in question, as it promotes and legitimizes an illegal and unregulated practice, misuses a professional title and poses a continuing risk of public information. That said, and without any admission of liability whatsoever, our client remains professional and solution-oriented.

We trust this response sufficiently clarifies our client's position. Should your client elect to pursue this matter further, we are confident that the courts will readily distinguish between defamation and responsible public-interest advocacy, particularly where prior warnings were issued and deliberately disregarded.

Yours faithfully,



**O. Akinkuehinmi Esq.**  
07060407989

