

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

PAUL B. ORHII

Plaintiff

VS.

SOWORE OMOYELE, DBA  
SAHARAREPORTERS.COM

Defendant

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CIVIL ACTION NO. \_\_\_\_\_

**PLAINTIFF’S ORIGINAL COMPLAINT**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Paul B. Orhii (“Dr. Orhii”), Plaintiff, complaining of Sowore Omoyele, Defendant, and for cause of action would respectfully show the following:

1. Plaintiff is a resident citizen of Houston, Harris County, Texas. Defendant is an individual residing in Englewood, New Jersey, where service may be perfected upon him pursuant to Rule 4(d) of the Federal Rules of Civil Procedure.

**JURISDICTION**

2. This Court has jurisdiction in this case pursuant to 28 U.S.C. § 1332(a)(1) in that this is an action between citizens of different states and the matter in controversy exceeds the minimal jurisdictional amount for this Court.

## **VENUE**

3. Pursuant to the provisions of 28 U.S.C. § 1391(a), the proper venue of this case is in the Southern District of Texas because a substantial part of the events or omissions giving rise to this claim occurred therein.

## **CLAIM**

4. This claim and cause of action is instituted to recover damages from the Defendant for irreparable, actual and exemplary or punitive damages caused and resulting from the publishing and uttering of untruths and falsehoods by the Defendant concerning the integrity and character of the Plaintiff. The Plaintiff, a native of Nigeria, is a naturalized U.S. citizen. Following the completion of his public education, Dr. Orhii obtained a West African School Certificate from St. Francis College Otukpo in Nigeria. Thereafter, he was awarded a medical degree from the State Medical Institute in Stavropol, Russia. He then received a PhD in Medicine (Neuropharmacology) from the State Medical Institute in Stavropol, Russia and a Juris Doctor degree from the Thurgood Marshall School of Law at Texas Southern University. Dr. Orhii has practiced medicine and law and has worked extensively in the fields of biomedical and pharmacological research; including teaching Pharmacology to medical students at the University of Jos in Nigeria. Between 1993 and 2003 Dr. Orhii worked as a scientist with the University of Texas Health Science Center at San Antonio, conducting research into novel treatments for post-menopausal osteoporosis, fetal alcohol syndrome, prostate cancer, etc. Dr. Orhii has authored and

co-authored more than 20 scientific publications. Those academic achievements and his work history have resulted in both social acceptability and economic gain for Dr. Orhii. There is attached to and incorporated herein a publication made by the Defendant upon his Internet site, "Sahara Reporters," on or about May 13, 2008, an article entitled "Pfizer Case Settlement: Aondoakaa Plans Big Payday Through Cousin." That publication was made in Houston, Texas; in Nigeria and elsewhere. Such publication contains blatant falsehoods concerning Dr. Orhii. Specifically, the publication falsely states that Dr. Orhii is the cousin of Michael Aondoakaa, the current Attorney General of the Federation and Minister of Justice of the Federal Republic of Nigeria. It furthermore states, falsely, that Attorney General Aondoakaa undertook to settle a lawsuit brought by the government of Nigeria against Pfizer for \$1 billion "so that he could pay himself \$10 million through his first cousin, Dr. Paul Botwev Orhii;" i.e. collect a bribe to be paid through the Plaintiff, a criminal offense. Such statements are blatantly false.

5. These clearly false statements and the inferences that can be drawn from them state plainly that Dr. Orhii, an accomplished scientist, medical doctor and attorney, engaged in a criminal conspiracy with the Attorney General of Nigeria to accept a bribe in connection with the settlement of the Pfizer litigation in Nigeria. Such false statements are libel, per se. These false statements were made with total malice as that term is understood in law, and in utter and reckless disregard of the

Plaintiff's rights. These false charges will live with Dr. Orhii for the balance of his life.

6. While the full extent of Dr. Orhii's damages is not yet fully known, they are clearly in excess of \$15 million. He has already suffered extensive actual damages and losses, not including the mental anguish and suffering brought about by such false charges. Even though he is a permanent resident of the United States, Dr. Orhii has engaged in business transactions, from time to time, within Nigeria. These false charges were visited upon Dr. Orhii at the peak and zenith of his economic life and at a time when he could have looked forward to the enjoyment of harvesting the benefits of his extensive education and professional experience, both in Nigeria and in Houston where he resides. In addition to his actual damages, Dr. Orhii should be awarded exemplary damages. It is also believed that the truth concerning the reckless failure and even refusal of Defendant to inquire as to the truth or falsity of his charges and allegations against Dr. Orhii will suggest to the Court and trier of fact that an even higher sum of punitive or exemplary damages should be awarded.

In addition to the payment of money damages, Dr. Orhii is entitled to an order of the Court directing that the Defendant publicly apologize for the defamatory publication, withdraw it and cease and desist causing similar publications concerning Dr. Orhii in the future.

WHEREFORE, PREMISES CONSIDERED, Plaintiff, Dr. Paul B. Orhii respectfully prays that the Defendant, Sowore Omoyele, be cited to appear and answer

herein and that upon final trial and hearing hereof, he be awarded \$25 million as his actual and exemplary or punitive damages. Additionally, Dr. Orhii is praying that the court awards him prejudgment and post-judgment interests, costs of court, and for such other and further relief to which he may show himself justly entitled, either at law or in equity.

Plaintiff respectfully demands a trial by jury.

Respectfully submitted,

THE COOK LAW FIRM

By: \_\_\_\_\_

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