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# Nigeria's Journey to Richland: Turning Things Up a Notch with the Federal Competition and Consumer Protection Act

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# Introduction

Let's imagine designing a country from scratch. Suppose the brief was to design 'Richland': a wealthy and prosperous country. What would be the chief characteristics you need to build into this country? What would a country ideally suited to succeed in modern capitalism look like? Traditional economics guides us to eight (8) core requirements for Richland: Military security and law and order; lack of corruption in institutions; low amounts of red-tape around employment, legislation, and taxation; a technically, well educated, mobile, flexible labour-force; high-grade infrastructure and good telecommunications; fair, transparent, and competitive markets; reliably enforceable contracts; and low corporation tax (probably between 10%–15%).<sup>1</sup>

Many Nigerians at home and in the Diaspora firmly believe that Nigeria can—and should be—Richland. Towards achieving economic prosperity for the country, the Nigerian

government has taken a commendable step in developing a fair, transparent, and competitive market by passing a new bill into law, the Federal Competition and Consumer Protection Act ("FCCPA" or "the Act") on 6 February 2019. Before the FCCPA was enacted, there was no comprehensive legislation regulating competition in Nigeria. Before now, competition was regulated through sector-specific laws such as the Electric Power Sector Reform Act 2005, Investment and Securities Act 2007<sup>2</sup>, Nigerian Communications Act 2003<sup>3</sup>, etc.

But is the FCCPA going to open the gateway to a more competitive Nigerian economy? To answer this question, it is vital to consider the scope and application of the Act, the regulatory framework, control of competition and merger, consumer-protection rights, and enforcement mechanisms under the Act.



<sup>1</sup> Transcript from "How to Make a Country Rich" The School of Life YouTube Channel. <https://youtu.be/Y9zThoMjzQU>

<sup>2</sup> Cap I24 Laws of the Federation of Nigeria 2014  
<sup>3</sup> Cap N97 Laws of the Federation of Nigeria 2004

# Scope and Application of the Act

The FCCPA applies to all commercial activities undertaken in the country for profit and satisfaction of public demand. This is regardless of whether these activities are undertaken by privately or publicly held corporate entities, corporate bodies in which either the Federal, State or Local Government has controlling stake, or agencies of the Federal Government.<sup>4</sup>

The FCCPA overrides the provisions of other laws in all matters relating to competition and consumer protection, but subject to the provisions of the Nigerian Constitution.<sup>5</sup>

It repeals the Consumer Protection Act<sup>6</sup> and sections 118–128 of the Investments and Securities Act<sup>7</sup>. It then provides for promotion of fair, efficient, and competitive markets in the Nigerian economy while ensuring the protection and promotion of consumer rights.



# Functions and Powers of the Federal Competition and Consumer Protection Commission

The FCCPA establishes the Federal Competition and Consumer Protection Commission (Commission).

The Commission's functions include administering and enforcing the provisions of the FCCPA and any other competition and consumer protection law; eliminating anti-competitive agreements, misleading, unfair, deceptive, or unconscionable marketing, trading, and business practices; and giving and receiving advice from other regulatory authorities or agencies within the relevant industry or sector on consumer protection and competition matters. Other functions include authorizing, prohibiting, or approving mergers and encouraging trade, industry, and professional associations to develop and enforce in their various fields quality standards designed to safeguard the interest of consumers.<sup>8</sup>

To carry out its tasks efficiently and effectively, the Commission is required to collaborate with other regulatory authorities, and trade, industry, and professional organizations locally and internationally.<sup>9</sup> These collaborations will necessarily involve Ministries, Departments and Agencies (MDAs), especially regulatory bodies such as National Information Technology Development Agency (NITDA), Nigerian Communications Commission (NCC), Standards Organisation of Nigeria (SON),

<sup>4</sup> Section 2 of the FCCPA

<sup>5</sup> Section 104 of the FCCPA

<sup>6</sup> Cap C25, Laws of the Federation of Nigeria 2004

<sup>7</sup> Cap I24, Laws of the Federation of Nigeria 2014

<sup>8</sup> Section 17 of the FCCPA

<sup>9</sup> Section 17 (b),(c), (f), (i), (p), (u), and (w) of the FCCPA

and National Agency for Food Drugs Administration and Control (NAFDAC), and others in competition and consumer protection regulation and related matters.

This brings us to which regulator has power over what and the possible regulatory frictions.

## Superiority of the Act to Other Relevant Laws in Nigeria, Red Flags, and Possible Regulatory Frictions

Regarding competition and consumer protection in Nigeria, the Act is superior to other laws in Nigeria, except the provisions of the Constitution of the Federal Republic of Nigeria (as amended).<sup>10</sup> This is stated in section 104 of the Act.

Having a comprehensive law on competition and consumer protection that cuts across sectors is a welcome idea. This is particularly so for sectors of the economy that have not witnessed adequate regulation in this regard. A good example is Nigeria's entertainment sector, which is largely self-regulated.<sup>11</sup>

But there is bound to be a problem when it comes to the Act regulating sectors already under regulation by virtue of pre-existing legislation, as far as consumer protection is concerned. A number of sectors are already

being regulated in this regard, namely the financial services industry (FSI), food and drugs industry, telecommunications industry, etc. Applying the Act to these sectors might lead to friction or overlapping functions between the relevant regulatory agencies that man these sectors and the Commission. This is a red flag that should not be ignored.

Let's for a second examine the regulatory role that NITDA is required to play regarding data protection and privacy of data subjects under the recently issued Nigerian Data Protection Regulation 2019 (Regulation). Among other things, the Regulation safeguards the rights of data subjects, essentially consumers in the context of consumer protection. The question is how would the Commission adroitly handle the protection of data subjects (consumers) in matters relating to data processing by data controllers and processors who are invariably subjects of the FCCPA? While it is clear that issues relating to competition is within the exclusive jurisdiction of the Commission, does the Commission also enjoy exclusivity over NITDA or the relevant authority on data protection, a critical aspect of consumer protection in today's data-driven economy? Red flags.

The provision of section 105(2) of the Act reveals that the drafters of the Act are not unaware of such red flags. It attempts a solution. In the subsection, it is provided that "[i]n so far as this Act applies to an industry or sector of an industry that is subject to the jurisdiction of any other law, in matters or conducts which affect competition and consumer protection, this Act shall be construed as establishing a concurrent jurisdiction between the Commission and the relevant government agency, with the

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<sup>10</sup> Cap C23, Laws of the Federation of Nigeria

<sup>11</sup> The Entertainment Sector in Nigeria is regulated largely by Intellectual Property Laws: The Nigerian Copyright Act, Cap C28, L.F.N. 2004; The Trademarks Act, Cap T13, L.F.N. 2004 and The Patents and Designs Act, Cap P2, L.F.N. 2004.

Commission having precedence over and above the relevant government agency". The Act defines a government agency as any government or regulatory agency whose mandate includes enforcement of competition and consumer protection law or principle.<sup>12</sup>

## Minimizing Regulatory Frictions through Inter-agency Collaboration and Defining "Public Interest"



In effect, the Commission will have concurrent jurisdiction with NITDA or any other relevant authority in the data-protection space. In the communications sector, the Commission will equally have concurrent jurisdiction with NCC. Similarly, the Commission will have concurrent jurisdiction with the Central Bank of Nigeria (CBN) in the financial sector (regardless of CBN's already existing Consumer Protection Framework)<sup>13</sup>. The Act then literally kicks things up a notch by bestowing on the Commission the power to take precedence over and above the relevant government agency.

While it is a noble idea to have a unified competition and consumer-protection law regulating all sectors, having such a law govern the affairs of all sectors—including sectors already being regulated—is not quite practicable. Making the Act take precedence over sector-specific regulations may result in inefficiency in regulation and consequently defeat the objective of the FCCPA.

Seeing that the superiority of the Act over other relevant laws and regulations on competition and consumer protection—particularly consumer protection—in Nigeria may result in undesired consequences, there is an attempt under the Act to provide a way out through negotiation between the Commission and relevant agency or agencies. Section 104(4) of the Act provides that "[t]he Commission shall negotiate with all government agencies whose mandate includes enforcement of competition and consumer protection for the purpose of coordinating and harmonising the exercise of jurisdiction over competition and consumer

<sup>12</sup> Section 105(3) of the FCCPA

<sup>13</sup>[https://www.cbn.gov.ng/Out/2016/CFPD/Consumer%20Protection%20Framework%20\(Final\).pdf](https://www.cbn.gov.ng/Out/2016/CFPD/Consumer%20Protection%20Framework%20(Final).pdf)

protection matters within the relevant industry or sector, and to ensure the consistent application of the provisions of the Act.” The subsection adopts negotiation as the primary mode of resolving the impasse that may arise between the Commission and the relevant regulatory agency. But it still puts the Commission in a favoured position. The Commission prevails.

It is recommended that during negotiation processes, the Commission should recognize the capabilities, experience, expertise, and technical knowledge of the relevant regulatory agency. There is need for deference on the Commission’s part in the regulatory space otherwise the level of harmonization the Act requires and contemplates will be difficult to attain. Working together with the relevant regulatory authorities with the common aim of promoting competition and protecting consumers, the Commission can indeed achieve its set aims and objectives seamlessly.



If negotiation fails or become inconclusive, section 104(7) of the Act confers on the Attorney General and Minister of Justice the power to advise on areas of disagreement referred to it. In doing so, the Attorney General and Minister of Justice is required to

consider public interest. What amounts to “public interest” is not defined under the Act.

Similarly, section 104(8) requires that “[i]n resolving the areas of disagreement as provided in subsection (7), the Attorney-General of the Federation and Minister of Justice shall take into account the advice of the Tribunal.” Particularly in respect of a sensitive matter such as mergers, there is a danger in using amorphous and ambiguous words such as “public interest” and subjecting this to the whims and caprices of (often) partisan state appointees. Is it not best we leave determination of “public interest” to the courts rather than to partisan politicians, especially considering that the offices of the Attorney General and Minister of Justice are not separate in Nigeria? Ekpu is worried too. With respect, he acknowledges that “the institutions [judiciary] and people that manage it – courts, lawyers and judges are not perfect, but the courts are less imperfect than politicians... Politicians only look after the next election and their sustenance in office... They [courts] have no vested interest to protect. That is not the case with partisan politicians. All partisan politicians have vested interests which make them retain only poor regard for the rule of law...the law courts have an appellate system which guarantees that mistakes made in the courts below have a chance of being rectified at the apex court which are manned by eminently experienced jurists. For partisan politicians you can only appeal to their conscience and if they have no conscience that is the end of the matter.”<sup>14</sup> A food for thought.

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<sup>14</sup> Ray Ekpu “Very Machiavellian” The Guardian, Tuesday, September 4, 2018 page 9

But thankfully, the Act at least requires a quasi-judicial and judicial process for persons aggrieved by the decisions of the Commission. According to the Act, “[a]ny person aggrieved by the Commission’s decision under this Part may file an application for review before the Tribunal and where the decision relates to a decision of the Tribunal, to the Court of Appeal.”<sup>15</sup>

## Competition and Merger Control under the Act

### *Fashion rules.*

In Richland, there are powerful currents of fashion around most things: what thickness your TV screen has; what kind of food you eat and which part of the country it comes from; what models of phone you use, etc. People can get rapidly dissatisfied with their current possessions and quickly get excited by new products (and services). It feels very important to be up to date. It is a serious blow to one’s self-esteem to feel that one is missing a trend. You can get into trouble if your phone is more than three years old. In Richland, it is all about what is trending and who is catching up with the trends.



This makes Nigeria a propitious market for goods and services providers who try to meet the ever-changing consumer demands with new products and services. Consequently, competition abounds. Market capitalism in Richland is very ‘efficient.’ And ‘efficiency’ means constant innovation and rivalry: the weaker players in any field are always driven out of business swiftly and without mercy. The stock market is ruthless about punishing underperformance, typically on a quarterly basis.

The FCCPA prohibits any agreement to restrain competition<sup>16</sup> or abuse of a dominant market position.<sup>17</sup> Indeed, putting an end to monopoly<sup>18</sup> as well as other unfair business practices such as price fixing and bid rigging is one of the Commission’s major statutory functions.<sup>19</sup>

The FCCPA also regulates merger transactions for public and private companies. It repealed sections 121–128 of the ISA and introduced new provisions relating to mergers. But it retained section 121(1)(d) of the ISA. This section allows SEC to continue to determine whether all shareholders are fairly, equitably, and similarly treated and given sufficient information with respect to mergers. Additionally, given that the provisions of ISA on takeovers and acquisitions remain unaffected by the new Act, SEC will also continue to enforce compliance with the takeover provisions in the ISA and monitor acquisition of shares of public companies.<sup>20</sup>

Under the new Act, the definition of mergers has been extended to include “joint venture.”

<sup>16</sup> Part VII, FCCPA

<sup>17</sup> Part IX, FCCPA

<sup>18</sup> Part X, FCCPA

<sup>19</sup> Part VIX, FCCPA

<sup>20</sup> <http://sec.gov.ng/new-merger-regime-frequently-asked-questions/>

This is an interesting addition which could have far-reaching implications for current or proposed joint venture (JV) arrangements, given that the Act did not define what type of joint venture would fall within the purview of the Commission or how a merger could be achieved through a JV arrangement. Isiadinso and Omoju also raised this concern: “It is not clear whether a one-off JV arrangement between business partners or the JV arrangement enshrined in the oil and gas industry where two or more parties combine to fund oil exploration would be deemed a merger transaction. Thus, it is important that the Commission provides guidelines on the type of JV arrangements that would be deemed a merger within the meaning of the Act.”<sup>21</sup>

Another interesting provision is the application of the Act to transactions relating to acquisition of shares or other assets outside Nigeria resulting in the change of control of a business, part of a business, or any asset of a business in Nigeria. A change in the ownership of an offshore parent of a Nigerian entity that results in the change of control of the Nigerian business would typically fall within the purview of the Act. For example, if Company A (a UK multinational) acquires majority shareholding in Company B, another UK company that has a wholly owned subsidiary in Nigeria and this offshore transaction results in the change of ownership or control of the Nigerian subsidiary, this transaction could be deemed a merger under the Act. It is therefore important for companies, particularly multinational entities to pay particular attention to this new development as it could

have major impact on their business activities and decisions.<sup>22</sup>

## Consumer Rights and Consumer Protection

*The consumer is king.*

In Richland, everything is geared towards the needs of consumers. There must be low prices. There must be excellent customer service. Shops must be opened at all hours or risk being closed by customers who prefer to buy from the 24-hour shop. (There can be no sacrosanct holidays or weekends.) It is immaterial that most people are both consumers and producers. In Richland, everyone is taught to think of himself or herself primarily as consumers. Their multiple woes as producers are carefully disassociated from the scale of their expectations as consumers.



In responding to the above demands, the FCCPA in Part XV attempts its best to enumerate consumer rights. These consumer rights include right to good quality goods and services; right to timely notification; right to redress by the court<sup>23</sup>;

<sup>21</sup> Ogochukwu Isiadinso and Emmanuel Omoju, ‘The Federal Competition and Consumer Protection Act 2019: Regulatory Implications for Merger Transactions in Nigeria’, Anderson Tax Digest, 19 March 2019, Business Day Newspaper, 9

<sup>22</sup> Ogochukwu Isiadinso and Emmanuel Omoju, ‘The Federal Competition and Consumer Protection Act 2019: Regulatory Implications for Merger Transactions in Nigeria’, Anderson Tax Digest, 19 March 2019, Business Day Newspaper, 9

right of remedy; right to fair dealings; right to choose suppliers; right to cancel advance reservation, booking, or order; and right to be informed of reconditioned or second hand goods. Others are right to information in plain and understandable language; right to disclosure of price of goods and services; right to choose or examine goods; right to return goods; and right to safe and good quality goods.

Generally, the enforcement regime in Nigeria is not great, to say the least. Therefore, to what extent these consumer rights are enforceable depends largely on the enforcement mechanisms provided under the Act.

and consumer protection in today's consumer market cannot be overemphasized. It can no longer remain the seller's market, but the buyer's.

According to Adeniran, "[t]he states are equipped with formidable powers and properties and to some extent-especially in authoritarian regimes-can repress free markets, as Communist governments have unfortunately shown. The trick then, is to keep up an optimal amount of intervention and regulation over the market to ensure it functions effectively and efficiently. The effective and efficient functioning does not have a specific look but has specific characteristics: free entry and exit of firms;



## Enforcement of the new Competition and Consumer Rights Regime in Nigeria

Enforcement mechanisms provided under any Act or regulation can make or mar it. Particularly in a country like Nigeria where efficient and effective rights enforcement is often a challenge for rights holders, the importance of ensuring an enforcement regime for an Act that governs competition

goods must be identical; and there are not information asymmetries, *inter alia*. The foregoing are what would see to the realization of a perfectly competitive and efficient market."<sup>24</sup>

Therefore, to ensure that the provisions of the Act are efficiently and effectively enforceable, the Act empowers the Commission to take charge of

<sup>24</sup> Ademola Adeniran, 'Competition Policy and Nigerian Commercial Governance' <http://cpparesearch.org/nu-en-pl/competition-policy-nigerian-commercial-governance/>

enforcement.<sup>25</sup> The enforcement powers of the Commission include issuance of warrants<sup>26</sup>, request for information or documents<sup>27</sup>, summons to attend or give evidence or produce documents<sup>28</sup>, prohibition of disclosure of information<sup>29</sup>, destruction of records<sup>30</sup>, and discontinuance of inquiry or investigations.

Apart from the Commission, the Competition and Consumer Protection Tribunal (Tribunal) has a vital role to play in enforcement through adjudication. With a 6-member Tribunal comprising of experienced persons from competition and consumer protection law, commerce and industry, public affairs, economics, finance, or business administration or management, and a Chairman with cognate experience in competition, consumer protection, or commercial and industrial law,<sup>31</sup> the Tribunal is in good hands.

Regarding enforcement of consumer rights, a number of options are available to an aggrieved consumer. First, a consumer may seek to enforce any right provided under the Act, a transaction, or agreement by referring the matter to any of three (3) persons: (a) the entity that supplied the goods or services; (b) the applicable industry regulator over the entity; or (c) the Commission, by filing a complaint.<sup>32</sup> These redress options do not restrict an aggrieved consumer's right to directly approach a court of competent jurisdiction for redress.

Second, for speedy redress, the Commission is empowered to issue a consent order to be

registered in a court of competent jurisdiction without the court having to hear any evidence. This applies whenever the Commission has investigated a matter and reached an agreement with the respondent on the proposed terms of an appropriate order. Surprisingly, the aggrieved party is not mentioned here.<sup>33</sup>

Third, the Act, amongst other things, permits aggrieved consumers to be represented by civil society groups in a court of law. For this purpose, the Commission is required to collaborate with, facilitate, or support civil society groups. Apart from litigation support, the Act makes room for civil society groups to provide consumer advice and education, surveillance and reporting, consumer rights and consumer interests advocacy, alternative dispute resolution through mediation or conciliation, etc.<sup>34</sup>

Under the Act, contravening consumer rights is an offence. In the case of natural persons, the person is liable on conviction to imprisonment for a term not exceeding five (5) years or to a fine not exceeding ten million (10) naira, or to both fine and imprisonment.<sup>35</sup> For a corporate body convicted for contravening consumer rights, the fine is not less than one hundred (100) million naira or 10% of its turnover in the preceding business year, whichever is higher.<sup>36</sup> Additionally, each director of the corporate body is liable to the same penalty that applies to natural persons under section 155(a) of the Act.

On the procedural part, penalties apply for violating any of the provisions of section 159 of the Act. Section 159 applies to violations

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<sup>25</sup> Section 27 of the FCCPA

<sup>26</sup> Section 28 of the FCCPA

<sup>27</sup> Section 32 of the FCCPA

<sup>28</sup> Section 33 of the FCCPA

<sup>29</sup> Section 35 of the FCCPA

<sup>30</sup> Section 36 of the FCCPA

<sup>31</sup> Section 40(1)(a) of the FCCPA

<sup>32</sup> Section 146(1) of the FCCPA

<sup>33</sup> Section 149(1)-(3) of the Act

<sup>34</sup> Section 151(1) of the FCCPA

<sup>35</sup> Section 155(a) of the FCCPA

<sup>36</sup> Section 155(b) of the FCCPA

such as refusing or failing to comply with a notice issued by the Commission; deceiving or knowingly misleading the Commission in relation to any matter before it; failing to appear to give evidence, take oath or affirm as a witness, or produce any document required by the Commission. For natural persons, the penalty is a fine not exceeding one (1) million naira or a term of imprisonment not exceeding three (3) months, or to both fine and imprisonment. And for a corporate body, a fine not exceeding ten (10) million applies.

These are tough penalties.

“Tough words indeed”, quips Adeniran, “but one wonders whether the Nigerian state has the institutional, bureaucratic, and technical capacity to appraise acts of market dominance and power, which can lead to or characterize monopoly.”<sup>37</sup> Tough.

Do the Commission, the Tribunal established by the Act, and relevant sectoral regulators have the capacity and capability to efficiently and effectively enforce the provisions of the Act?

Time will tell. However it is, Nigeria must keep learning, unlearning, and relearning from the process, and do so fast. Red-tapism is a major red flag. Any lack or perceived lack of political will to go the whole hog will not help us. To become Richland, we must be agile. We must bring purpose and innovation to governance and administrative processes. We must grow up.

## Conclusion

We all would at some point in our lives wish to visit, live, or do business in a place like Richland, if we are not already wishing so.

It is true that we cannot simply legislate Nigeria into becoming more competitive. But we can put in place the legislations that will create the enabling environment for stimulating, sustaining, and protecting competition. The FCCPA lays the foundation for an efficient competition and consumer protection regime in Nigeria. The Act holds businesses to a much higher standard in the marketplace, prevents anti-competitive behaviour by businesses, and bolsters consumer rights.

The Commission should leverage on the technical expertise and experience in regulated sectors such as information technology, telecommunications, banking and financial services, amongst others to ensure harmonious inter-agency relationship. It is further recommended that the Commission should consider the peculiarity of each sector and strive to avoid actions that may negatively disrupt the operations of these regulated sectors. The Commission may set up departments comprising experts in the relevant fields or create a provision for an *ad hoc* committee of expert advisers from each sector whose guidance would ensure that the implementation of the Act would help attain the purpose of the Act, not defeat or frustrate it.

Finally, in the present Fourth Industrial Age, no nation can compete effectively in the global market without having an efficient and effective intellectual property (IP) protection

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<sup>37</sup> Ademola Adeniran, ‘Competition Policy and Nigerian Commercial Governance’ <http://cpparesearch.org/nu-en-pl/competition-policy-nigerian-commercial-governance/>

regime. Nigeria is lagging behind, even in Africa and this must be urgently addressed from both policy and legislative angles. Competition today is innovation-driven. And at the heart of these innovations are proprietary components. Nigeria needs to reform its IP laws, particularly industrial property such as laws on industrial design, patent, and trademark. It is also high time Nigeria had a trade secrets law. For comparative advantage in global trade and commerce, we also need to pay attention to geographical indications and traditional knowledge. The time to get the legislations right is now.

But beyond legislation for a competitive economy, more definitive actions in other core areas is required to change the competitive landscape of Nigeria. The country's infrastructure deficit needs to be seriously addressed. Governance needs to be decentralized through a devolution of powers across the states, unleashing innovation at the local level. There must be harmonious collaborations amongst relevant

MDAs of government based on best global practices. There must be rule of law, constitutionalism, and transparency. These measures will significantly aid efficiency and effectiveness, resulting in a more competitive economy. It would ease the burden for businesses—especially small and medium-scale enterprises—who daily grapple with overhead-cost issues such as generating their own power, providing private security, deploying healthcare schemes for their staff. When the government fix such issues, businesses would be able to channel more resources to R&D, ultimately leading to more innovation, economic diversity, and prosperity. Both local and global businesses will become competitive, creating job opportunities for our ever-growing youth population.

Nigeria can become that Richland where the consumer is truly king, if we maximize our potentials, not minimize it. Let the competition begin. Let the consumers be king. Let Nigeria compete.





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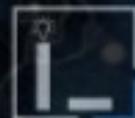
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