

2ND RESPONDENT

FOR SERVICE

IN THE HIGH COURT OF THE FEDERAL CAPITAL TERRITORY ABUJA
IN THE ABUJA JUDICIAL DIVISION
HOLDEN AT ABUJA

SUIT NO: *W/7043/23*

IN THE MATTER OF AN APPLICATION FOR THE ENFORCEMENT OF THE APPLICANT'S FUNDAMENTAL RIGHT

BETWEEN:
IBRAHIM LAWAL (AKA MALAM USAMA).....APPLICANT

AND

- 1. SENATOR MOHAMMED ALI NDUME**
- 2. MANSUR JARKASA**
- 3. CSP, IBEH CHUKWUDI AP/NO: 87678.....RESPONDENTS**

ORIGINATING MOTION

BROUGHT PURSUANT TO ORDER 2 RULES 1 & 4; ORDER 6 RULE 1 OF THE FUNDAMENTAL RIGHTS ENFORCEMENT PROCEDURE RULES, CAP 62 LAWS OF THE FEDERATION 1990 ARTICLE 6 & 7 (B) OF THE AFRICAN CHARTER ON HUMAN AND PEOPLES RIGHTS (RATIFICATION AND ENFORCEMENT) ACTS CAP 10 LAWS OF THE FEDERATION 1990 SECTIONS 34(1),35(1)(4), 37, 41(1), 43 & 46(1) OF THE CONSTITUTION OF THE FEDERAL REPUBLIC OF NIGERIA 1999 (AS AMENDED) AND UNDER THE INHERENT JURISDICTION OF THIS HONOURABLE COURT.

TAKE NOTICE THAT this Honourable Court will be moved on the..... day of....., 2023 at the hour of 9 O'clock in the forenoon or so soon thereafter as Counsel on behalf of the Applicant may be heard praying for the following: -

- a. **A DECLARATION** that the humiliation, assault, beating, grievous bodily harm and injuries inflicted on the Applicant by mobs mobilized by the 1st and 2nd Respondents constitutes a violation of the Applicant's right to dignity of human person guaranteed by Section 34 (1) of the 1999 Constitution of the Federal Republic of Nigeria (As amended).
- b. **A DECLARATION** that the detention of the Applicant for six (6) days before arraignment, molestation, humiliation, harassment, intimidation and threat by the 3rd Respondent which was sponsored by the 1st and 2nd Respondents from the 20th day of June, 2023 to 26th day of June, 2023 is unlawful, unconstitutional, illegal and a violation of the Applicant's fundamental rights

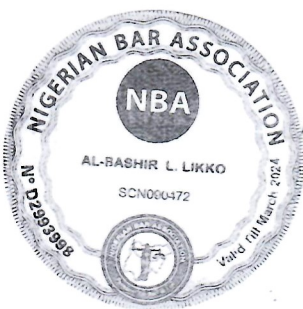
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guaranteed by Section 35(1) & (4) of the 1999 Constitution of the Federal Republic of Nigeria (As amended).

- c. **A DECLARATION** that the re-arrest and detention of the Applicant for three (3) days from **12th to 14th day of July, 2023** by the 3rd Respondent on account of a similar fact pending before a Magistrate Court Karu, in FIR-CR/09/23 is unlawful, unconstitutional and direct infraction of the rights of the Applicant to freedom of movement as guaranteed by section 41 of the Constitution of the Federal Republic of Nigeria, 1999 (As amended).
- d. **A DECLARATION** that the restriction, harassment, intimidation and threat of re-arrest of the Applicant by the 3rd Respondent and mobs mobilized by the 1st and 2nd Respondents on account of the case pending before the Magistrate Court Karu, Abuja in FIR-CR/09/23 is unlawful, unconstitutional and direct infraction of the rights of the Applicant to freedom of movement as guaranteed by section 41 of the Constitution of the Federal Republic of Nigeria, 1999 (As amended).
- e. **A DECLARATION** that the act of trespass into the Applicant's residence and destruction of his properties by mobs mobilized by the 1st and 2nd Respondents constitutes a violation of the Applicant's right to private and family life, therefore, is unlawful, unconstitutional, illegal and a violation of the Applicant's fundamental rights guaranteed by Section 37 of the 1999 Constitution of the Federal Republic of Nigeria (As amended).
- f. **A DECLARATION** that the prevention of the Applicant to re-unite with his family and threat of re-arrest him by the 3rd Respondent and threat of grievous harm by mobs mobilized by the 1st and 2nd Respondents on account of a case pending before Magistrate Court, constitutes a deprivation of the Applicant's right to family life therefore is unlawful, unconstitutional and an infraction of the Applicant's rights as guaranteed by section 35(3) of the Constitution of the Federal Republic of Nigeria 1999 (As amended).
- g. **AN ORDER OF INJUNCTION** restraining the Respondents whether by themselves, assigns, privies, agents or whosoever purporting to act on their behalf from violating or further violating the fundamental rights of the Applicant as guaranteed by section 34 (1), 35, (1) & (4), 37, 39 (1), 41 (1) 43 and 46 (1) of the Constitution of the Federal Republic of Nigeria 1999(As amended).
- h. **AN ORDER OF PERPETUAL INJUNCTION** restraining the Respondents whether by themselves, assigns, privies, agents or whosoever purports to act on their behalf from violating or further violating the fundamental rights

- i. of the Applicant or upon such terms as this Honourable Court may deem appropriate in the circumstances, pending the determination of this suit.
- j. **AN ORDER** of Court restraining the 3rd Respondent whether by himself, assigns, privies, agents or whosoever purporting to act on his behalf from re-arresting the Applicant as a result of the 1st and 2nd Respondents' instigation and fabrication in respect of the subject matter pending before the Magistrate Court Karu, as well as restraining the Respondents from interfering with the personal liberty of the Applicant.
- k. **AN ORDER** directing the 1st and 2nd Respondents to unconditionally pay the sum of **₦20,000,000.00 (Twenty Million Naira)** only as special damages for the destruction of the Applicant's properties, medical bills and hotel bills among other expenses incurred/suffered by the Applicant as a result of the mobbed action mobilized and sponsored by the 1st and 2nd Respondents.
- l. The sum of **₦500, 000, 000. 00 (Five Hundred Million Naira)** only as general, exemplary and aggravated damages jointly and or severally against the **Respondents** to the **Applicant** for unlawful, unconstitutional arrest and detention, humiliation, assault, beating, causing grievous bodily harm and injuries.
- m. **AND FOR SUCH FURTHER ORDER (S)** as this Honourable Court may deem fit to make in the circumstances of this suit.

Dated this 20th day of July, 2023



[Handwritten signature]
AL-BASHIR LAWAL LIKKO, NP, FNILA, FICMC, AIIFP ✓
ISYAKU SALEH, ESQ.
IBRAHIM AL-HASSAN, ESQ.
MUHAMMAD NOOR ALIYU, ESQ.
GABRIEL CHIKWADO EZE, ESQ.
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FOR SERVICE ON:

1. THE 1st RESPONDENT,

Senator Mohammed Ali Ndume,
National Assembly Complex,
Senate Building
Three Arms Zone
Central Business District,
FCT-Abuja.

OR

House 56, Chuba Okadigbo Street
Zone B, Apo Legislative Quarters
FCT-Abuja.

2. THE 2nd RESPONDENT,

Mansur Jarkasa,
No. 1, Abubakar Rimi Crescent,
Apo Legislative Quarters,
Zone B, FCT-Abuja.

3. THE 3rd RESPONDENT,

CSP, Ibeh Chukwudi AP/No.87678,
DPO, Apo Divisional Police Station
Apo, Legislative Quarters
FCT-Abuja.

IN THE HIGH COURT OF THE FEDERAL CAPITAL TERRITORY ABUJA
IN THE ABUJA JUDICIAL DIVISION
HOLDEN AT ABUJA

SUIT NO:

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APPLICANT'S FUNDAMENTAL RIGHT***

BETWEEN:

IBRAHIM LAWAL (AKA MALAM USAMA).....APPLICANT

AND

- 1. SENATOR MOHAMMED ALI NDUME**
- 2. MANSUR JARKASA**
- 3. CSP, IBEH CHUKWUDI AP/NO: 87678.....RESPONDENTS**

**STATEMENT OF FACTS FILED PURSUANT TO SECTION 46(1) & (2), 35(1)
& (4) OF THE 1999 CONSTITUTION OF THE FEDERAL REPUBLIC OF
NIGERIA, ORDER 1 RULE 2(3) FUNDAMENTAL RIGHTS (ENFORCEMENT
PROCEDURE) RULES CAP 62 LAWS OF THE FEDERATION OF NIGERIA
1990**

1. NAME AND DESCRIPTION OF THE APPLICANTS:

IBRAHIM LAWAL (AKA MALAM USAMA), Male, Muslim, Nigerian citizen, Chief Imam of Zone B, Mosque, No. 5, Abubakar Rimi Crescent, Apo Legislative Quarters, FCT-Abuja.

2. NAMES AND DESCRIPTION OF THE RESPONDENTS:

- i. **SENATOR MOHAMMED ALI NDUME**, is the 1st Respondent in this suit. He is the Chief Whip of the 10th Senate of the Federal Republic of Nigeria. Senator, representing Borno South, Senate building, National Assembly Complex, Three Arms Zone, FCT-Abuja with a home address situate at House 56, Chuba Okadigbo Street Zone B, Apo Legislative Quarters, FCT-Abuja.
- ii. **MANSUR JARKASA**, is the 2nd Respondent in this suit, whose address is No. 1, Abubakar Rimi Crescent, Apo Legislative Quarters, FCT-Abuja. Contact number: 08033202056.
- iii. **CSP, IBEH CHUKWUDI AP/No.:87678 (DPO, APO Legislative Quarters)** is the 3rd Respondent and person in charge of Apo Legislative

Quarter 1 Divisional Police Station, Apo FCT-Abuja, where the Applicant was arrested and detained. Contact number: 08033763506.

3. RELIEFS SOUGHT:

- a. **A DECLARATION** that the humiliation, assault, beating, grievous bodily harm and injuries inflicted on the Applicant by mobs mobilized by the 1st and 2nd Respondents constitutes a violation of the Applicant's right to dignity of human person guaranteed by Section 34 (1) of the 1999 Constitution of the Federal Republic of Nigeria (As amended).
- b. **A DECLARATION** that the detention of the Applicant for six (6) days before arraignment, molestation, humiliation, harassment, intimidation and threat by the 3rd Respondent which was sponsored by the 1st and 2nd Respondents from the **20th day of June, 2023 to 26th day of June, 2023** is unlawful, unconstitutional, illegal and a violation of the Applicant's fundamental rights guaranteed by Section 35(1) & (4) of the 1999 Constitution of the Federal Republic of Nigeria (As amended).
- c. **A DECLARATION** that the re-arrest and detention of the Applicant for three days from **12th to 14th day of July, 2023** by the 3rd Respondent on account of a similar fact pending before Magistrate Court Karu, in FIR-CR/09/23 is unlawful, unconstitutional and direct infraction of the rights of the Applicant to freedom of movement as guaranteed by section 41 of the constitution of the Federal Republic of Nigeria, 1999 (As amended).
- d. **A DECLARATION** that the restriction, harassment, intimidation and threat of re-arrest the Applicant by the 3rd Respondent and mobs mobilized by the 1st and 2nd Respondents on account of the case pending before the Magistrate Court Karu, Abuja in FIR-CR/09/23 is unlawful, unconstitutional and direct infraction of the rights of the Applicant to freedom of movement as guaranteed by section 41 of the Constitution of the Federal Republic of Nigeria 1999 (As amended).
- e. **A DECLARATION** that the act of trespass into the Applicant's residence and destruction of his properties by mobs mobilized by the 1st and 2nd Respondents constitutes a violation of the Applicant's right to private and family life, therefore, is unlawful, unconstitutional, illegal and a violation of the Applicant's fundamental rights guaranteed by Section 37 of the 1999 Constitution of the Federal Republic of Nigeria (As amended).
- f. **A DECLARATION** that the prevention of the Applicant to re-unite with his family and continues threat of re-arrest by the 3rd Respondent and threat of

grievous harm mobilized by the 1st and 2nd Respondents on account of a case pending before Magistrate Court, constitutes a deprivation of the Applicant's right to family life therefore is unlawful, unconstitutional and an infraction of the Applicant's rights as guaranteed by section 35(3) of the Constitution of the Federal Republic of Nigeria 1999 (As amended).

- g. **AN ORDER OF INJUNCTION** restraining the Respondents whether by themselves, assigns, privies, agents or whosoever purporting to act on their behalf from violating or further violating the fundamental rights of the Applicant as guaranteed by section 34 (1), 35, (1) & (4), 37, 39 (1), 41 (1) 43 and 46 (1) of the Constitution of the Federal Republic of Nigeria 1999(As amended).
- h. **AN ORDER OF PERPETUAL INJUNCTION** restraining the Respondents whether by themselves, assigns, privies, agents or whosoever purports to act on their behalf from violating or further violating the fundamental rights of the Applicant or upon such terms as this Honourable Court may deem appropriate in the circumstances, pending the determination of this suit.
- i. **AN ORDER** of Court restraining the 3rd Respondent whether by himself, assigns, privies, agents or whosoever purporting to act on his behalf from re-arresting the Applicant as a result of the 1st and 2nd Respondents' instigation and fabrication in respect of the subject matter pending before the Magistrate Court Karu, as well as restraining the Respondents from interfering with the personal liberty of the Applicant.
- j. **AN ORDER** directing the 1st and 2nd Respondents to unconditionally pay the sum of **₦20,000,000.00 (Twenty Million Naira)** only as special damages for the destruction of the Applicant's property, medical bills and hotel bills among other expenses incurred/suffered by the Applicant as a result of the mobbed action mobilized and sponsored by the 1st and 2nd Respondents.
- k. The sum of **₦500, 000, 000. 00 (Five Hundred Million Naira)** only as general, exemplary and aggravated damages jointly and or severally against the **Respondents** to the **Applicant** for unlawful, unconstitutional arrest and detention, humiliation, assault, beating, causing grievous bodily harm injuries among other things.
- l. **AND FOR SUCH FURTHER ORDER (S)** as this Honourable Court may deem fit to make in the circumstances of this suit.


4. GROUNDS UPON WHICH THE APPLICATION IS BROUGHT:

- A.** That being a Nigerian Citizen, the rights of the Applicant as guaranteed by the constitution cannot be taken away save in a manner prescribed by the Constitution;
- B.** Detention of the Applicant as well as the beating, threats, humiliation, insults and psychological torture meted out to the Applicant by the Respondents is unconstitutional and a violation of the Applicant's right as guaranteed by the Constitution of the Federal republic of Nigeria, 1999 (As amended).
- C.** The rights of the Applicant as guaranteed by the Constitution of the Federal Republic of Nigeria 1999 (As amended) is sacrosanct and cannot be violated save in a manner prescribed by the law.
- D.** To keep threatening, humiliating, depriving, insulting and psychologically intimidating and oppressing the Applicant with threats of arrest while the matter is still pending before the court is unconstitutional, illegal and an infraction of his constitutional rights.
- E.** It is unlawful and unconstitutional for the 1st and 3rd Respondents to use the coloration of their offices or position to seek to deprive the Applicant of his legally guaranteed right to deal with his family and students within his residence or Zone B, mosque where he is the Chief Imam/leader in Apo legislative Quarters or anywhere.
- F.** The Applicant's right to dignity of human person, right to personal liberty, right to private and family life are being threatened by the Respondents jointly and severally.

5. FACTS UPON WHICH THE RELIEFS ARE SOUGHT

The facts here are the same as those deposed to in the affidavit supporting this application and which said facts are most humbly adopted here as well.

Dated this 20th day of July, 2023



AL-BASHIR LAWAL LIKKO, NP, FNILA, FICMC, AIIFP
ISYAKU SALEH, ESQ.
IBRAHIM AL-HASSAN, ESQ.
MUHAMMAD NOOR ALIYU, ESQ.

**GABRIEL CHIKWADO EZE, ESQ.
MUS'AB AWWAL MU'AZ, ESQ.
MUBARAK AHMAD DANTATA, ESQ.
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AFFIDAVIT IN SUPPORT OF ORIGINATING MOTION

I, **SHAMSIYYAH IBRAHIM**, female, adult & Nigerian citizen of No. 5, Abubakar Rimi Crescent, Zone B Mosque, Apo Legislative Quarters, FCT-Abuja hereby make oath and state as follows:

1. That I am the Applicant's first wife by virtue of which I am conversant with the facts deposed to in this affidavit;
2. That the facts deposed to in this Affidavit are from my personal knowledge and those supplied to me by the Applicant.
3. That the Applicant is the Chief Imam of Zone B, Mosque, Abubakar Rimi Crescent, Apo Legislative Quarters, FCT-Abuja, for over 20 years.
4. That the Applicant is a strong stakeholder of Zone B, Mosque at Apo Legislative Quarters, Abuja.
5. That the Applicant is a responsible and well-respected Imam in Apo Legislative Quarters, Abuja.
6. The 1st Respondent is a Senator of the Federal Republic of Nigeria representing southern Borno State with an office at Senate building, National Assembly Complex, Three Arm Zone FCT-Abuja.

7. The 2nd Respondent is a retired Civil servant of No. 1, Abubakar Rimi Crescent, Apo Legislative Quarters, FCT-Abuja.
8. The 3rd Respondent is the Divisional Police Officer, Divisional Police Station, Apo, Legislative Quarters, FCT-Abuja.
9. That on the 16th day of June, 2023 I was told by the Applicant in our matrimonial home at No. 5, Abubakar Rimi Crescent, Zone B mosque, Apo Legislative Quarters, Abuja around 2200 hours of the following facts which I verily believe to be true and correct as follows:
 - a. That the 1st Respondent made an announcement in the mosque, henceforth, they will be closing the mosque after afternoon prayers every day.
 - b. That the Applicant admonished people on the importance of seeking knowledge and practicing it in accordance with the holy book and authentic tradition of the holy prophet.
 - c. That the 1st Respondent furiously left the mosque because he suspected that the admonishment was directed against him.
 - d. That the 1st Respondent later came back to the mosque and started insulting and harassing the Applicant despite the fact that those around in the mosque, explained to the 1st Respondent that the admonishment was never directed or against him. Thereafter, the 1st Respondent angrily left the mosque.
 - e. That the 1st Respondent mobilized his son (Baba) and his friends to come and dealt with the Applicant. When they reached the mosque, they found many people sympathizing with the Applicant on the 1st Respondent insult, those people narrated to them the whole incidence and they left immediately.
 - f. That the next day, on the 17th day of June, 2023 the 1st Respondent conspired with the 2nd Respondent and organized a meeting early morning in the mosque. The Applicant was inside the mosque while the 2nd Respondent ordered him to go out. When he refused to go out being the leader and the Chief Imam, the 2nd Respondent started pushing out from the mosque and ordered his son and his friends to push the Applicant out by force, beat and assaulted him. As a result of that the youths torn up his clothes and maltreated him in the presence of the congregation.
 - g. That the Applicant and one Kasimu Isa reported the incident to the 3rd Respondent's Division at Apo Legislative Quarters. The picture of the said torn

clothes were snapped at the Apo, Divisional Police Station by a photographer one Sulaiman with Nikon D60 camera on the 17th day of June, 2023 around 20:00 hours am and printed the said picture via a Canon Printer in the ordinary cause of activities and at that material time both the camera and the Printer were operating properly to have processed and print the said picture. **Copies of the said pictures are hereby attached and marked as Exhibit U1.**

- h. That to the Applicant's surprise the 3rd Respondent neither invited the 1st and 2nd Respondents and their sons nor arrested the mobs mobilized/instructed by the 1st Respondent who insulted and humiliated the Applicant.
- i. That the Applicant went back to the 3rd Respondent office for the second time on Sunday morning to know the status of the police investigation, but the officers present informed him that they cannot do anything until the 3rd Respondent give them instruction. They later said "it is a fight between big men".
- j. That on the same day, Sunday the 18th day of June, 2023 while the Applicant was about to lead evening prayer, the 1st and 2nd Respondents mobilized mobs to came to the mosque and held the microphone, telling the Applicant that he should not lead the prayers because their bosses (1st and 2nd Respondents) had suspended him.
- k. That the Applicant was flabbergasted on the whole incidence therefore, he insisted on leading the prayers, but one of the elderly members of the mosque advised him to leave the mosque and he left immediately.
- l. That the Applicant reported this development to the Apo Divisional Police Station and drew their attention to the fact that their inaction birthed this continued crisis.
- m. That the Applicant was driving back to his house when he heard the mobilized mobs chanting; "he is the one, he is the one". That before he knew it, the mobs on the instruction of the 1st and 2nd Respondents attacked him by hitting him on the head which caused a serious injury to his head.
- n. That the Applicant managed to seek for medical attention at Garki Hospital, Area 8, Abuja. The pictures showing the injury on his head with the blood stain on his cloth was snapped by one Umar with Tecno Spark 10 phone camera on the 18th day of June, 2023 around 10:30pm at Garki Hospital, Area 8, Abuja and printed the said picture via a Canon Printer in the ordinary cause of activities and at that material time when the Phone and the Printer

were operating properly to have processed and print the said picture. **Copies of the said pictures are hereby attached and marked as Exhibit U2.**

- o. That on Monday, the 19th day of June, 2023, while the Applicant still at the Garki hospital for treatment, a police officer called and informed him that the 1st Respondent is at their Divisional Police Station and asked him to come over so that everything would be settled there. The Applicant managed to leave the hospital to attend the Divisional Police Station. On getting there, he did not meet the 1st Respondent. Instead, met 2 (two) of his visitors who were attacked and injured by the mobs on Sunday evening, and they informed him that they were there to lodge a complaint with regards to their assault the previous day, but the 3rd Respondent ordered for their arrest and detention.
- p. That while the Applicant was at the Garki Hospital, receiving treatment, the mobs mobilized/instructed by the 1st and 2nd Respondents entered our house, attacked everyone in the house, destroyed and steal the household items including; electronic gadgets, cell phones, furniture, kitchen utensils, our clothes and other personal belongings, chased us away from the house and locked it up. The pictures showing the destruction and the way they burgled some doors was snapped by me with the Applicant cell Samsung Note 9 camera on the 12th day of July, 2023 around 5:00pm and printed the said picture via a Canon Printer in the ordinary course of activities and at that material time when the Phone and the Printer were operating properly, to have processed and print the said picture. **Copies of the said pictures are hereby attached and marked as Exhibit U3.**
- q. That the Applicant went straight to the 3rd Respondent's office, where the 3rd Respondent informed him that the 1st Respondent wants the matter to be settled and he will compensate all that the Applicant spent on treatment and pay for the losses he incurred as a result of the mobs attacked. While the Applicant told the 3rd Respondent that the matter could not be resolved without arresting the 1st and 2nd Respondents' children and their friends who took mobs action, stole and destroyed his belongings. **Copies of the receipts for the treatment received at Garki Hospital, Area 3, Garki Abuja are hereby attached and marked as Exhibit U4.**
- r. That on the 20th day of June, 2023 we received relatives from Katsina State who came to sympathize with us over the unfortunate incident that happened. While the Applicant was with them (our relatives from Katsina) in our house the Applicant heard their driver shouting outside, seeking for help, because mobs were beating him. The Applicant and six other persons

went out to see what was happening, while they were there in front of the Applicant house, the 3rd Respondent came with his colleagues and arrested him and the six of our visitors that came to sympathize with us and took them to the Police Station and detained all of them.

- s. That thereafter, the 1st and 2nd Respondents mobilized the same mobs to come and attacked the remaining 4 of our relatives who came to sympathize with us and injured them seriously. Then the 3rd Respondent sent police officers to our house and arrest our relatives who were injured by the mobs mobilized by the 1st and 2nd Respondents and took them to the police station instead of taking them to the hospital. When the Applicant saw them lying unconscious, he told the police "If these people died, we would hold you responsible". Thereafter, they were taken to the National Hospital Abuja by the police. Among them is one Suleiman Mansur who suffered a lot of injuries in his body. **Copy of the receipt for the treatment received at National Hospital Abuja is hereby attached and marked as Exhibit U5.**
 - t. That the Applicant and six (6) other of his relatives were arrested and detained by the 3rd Respondent in the Apo Divisional Police station's cell and held in detention for two (2) days from the 20th day of June, 2023 to 22nd day of June, 2023 without anyone stating in clear terms the offence for which they were detained.
 - u. That on the 22nd day of June, 2023 the 3rd Respondent took the Applicant and the six other persons to the FCT-Command and detained all of them at SARS for four (4) days from 22nd to 26th day of June, 2023.
 - v. That on the 26th day of June, 2023 the Applicant and the Six (6) other persons were charged to a Magistrate Court, Karu for conspiracy and inflicting public disturbances via FIR-CR/09/23. They all pleaded not guilty. Court granted them bail after fulfilling the condition they were released on bail. **Copy of the said FIR receipt is hereby attached and marked as Exhibit U6.**
 - w. That the Applicant was released on bail by the court, the case was adjourned to the 25th day of July, 2023 for hearing. Thereafter, the 3rd Respondent warned the Applicant that if he dares go back to his house, police will arrest and detained him. As a result of fear of arrest, the Applicant cannot go to his house. **Copies of the receipts of Sheikh Abubakar Mahmud Gumi Guest inn where the Applicant lodged for some time are hereby attached and marked as Exhibit U7.**
10. That on the 12th day of July, 2023 the Applicant was advised to go back to his house and continue leading prayers in the mosque. On getting there he

led prayer successfully without any hitches and people followed him. After the prayers some sympathized with him. unknown to him, the 1st and 2nd Respondents instigated/facilitated the 3rd Respondent to come and re-arrest the Applicant and detained him in the police custody for three (3) days from 12th to 14th day of July, 2023 despite the fact that the matter is pending before the Magistrate Court, Karu, and the court granted him bail.

11. That the Applicant was later released by the police on bail after he provided a surety. However, was directed to report on the 17th day of July, 2023. Before he left, one CSP, Aliyu Umar Ruwandorawa warned the Applicant that if he dares go back to his house, police will arrest and detained him again.
12. That the Applicant reported to the FCT Police Command as instructed on the 17th day of July, 2023. A police officer, one ASP Bulus kept him hosted for hours thereafter took him to the same Magistrate Court, Karu with a fabricated charge against him. The Magistrate rejected the new FIR on the ground that the case is pending before him and it was adjourned to the 25th day of July, 2023 for hearing.
13. That the Applicant remain far away from his house to avoid giving the Respondents reason to achieve their ill motive of arresting and humiliating him.
14. That the Applicant have been lodging in a hotel and guest house to avoid harassment, intimidation and arrest by the Respondents.
15. That on the 17th day of July, 2023 the 1st Respondent sent some youths to entered our house without permission to threatened us with 24 hours' notice to vacate the house or else face serious humiliation and arrest by the police.
16. That I and my mate with all our children have been consistently and seriously been intimidated and harassed by the mobs mobilized by the 1st and 2nd Respondents. As such, we are in a serious hardship and pain due to the absence of the Applicant.
17. That the Applicant's children (our children) cannot go to school for fear of harassment and humiliation by the youths sponsored by the 1st and 2nd Respondents. As a result of that our children missed their 3rd term examination in school.
18. That without the order of this honorable court restraining the Respondents, the Applicant will never come back and re-unite with his family freely and peacefully.

19. That the Applicant is a family man, a father, husband, brother and breadwinner of his immediate and extended family and his abrupt detention has devastated his family.
20. The Applicant believes that it is only this court that has the power to protect him and his family.
21. That it is in the interest of justice to grant the reliefs sought by the Applicant.
22. That the Respondents will not be prejudiced if the Applicant's application is so granted.
23. That I, **SHAMSIYYAH IBRAHIM**, make this solemn declaration on oath in good faith believing same to be true and correct and in accordance with the **Oath Act**.



DEPONENT

ILLITRATE JURAT

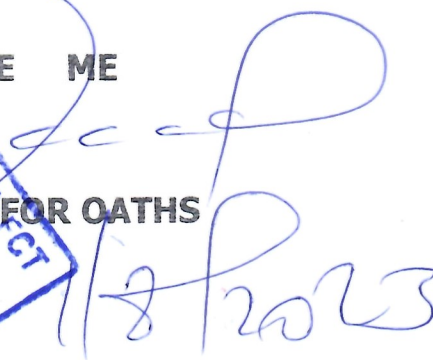
The above Affidavit in support of the Origination Motion having been first read and interpreted by me, **Mus'ab Awwal Mu'az, Esq.** from English language to Hausa language when **Shamsiyyah Ibrahim** appeared to have perfectly understood the contents as represented her deposition in Hausa language before affixing her signature.

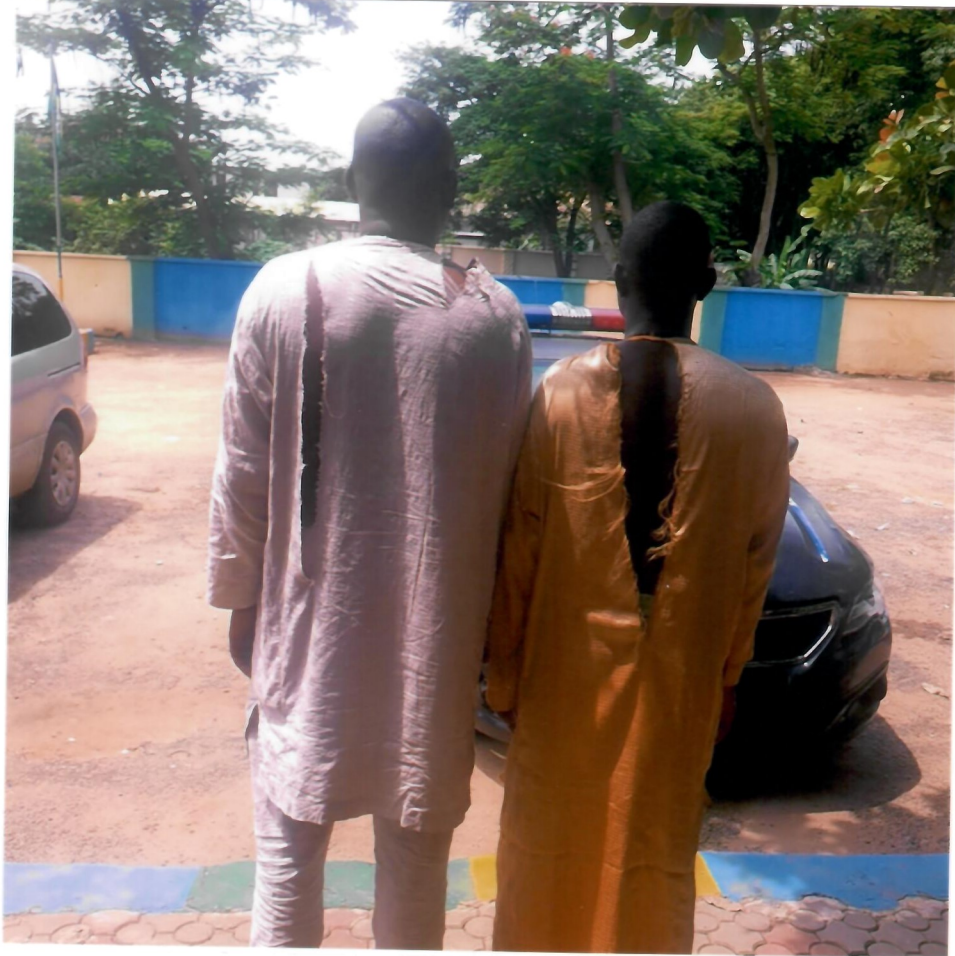


 Signature of **Mus'ab Awwal Mu'az, Esq.** (Interpreter)

Sworn to at the Registry of the FCT High Court Maitama, Abuja

Dated this 15th **day of** August **, 2023**

BEFORE ME

COMMISSIONER FOR OATHS
15/8/2023



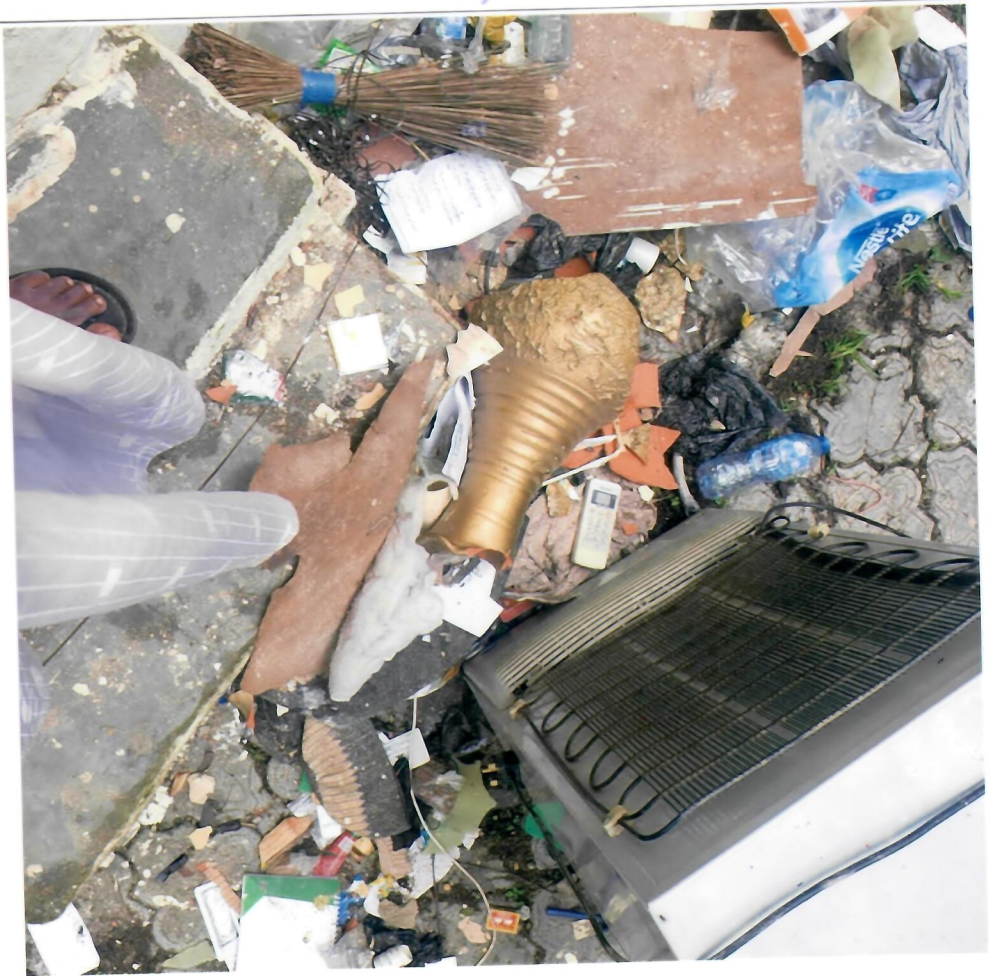


12/12/2019



















Garki Hospital

Tafawa Balawa Way Area 8, Garki

09-2349221

Payment Receipt

Patient's Name:
Patient's FMR ID:
Transaction Date:
Amount:
Transaction Number:
Payment Method:
Remaining Balance:

IBRAHIM LAWAL
00000228755
2023-07-22 11:19:16
N2000
00015636678
Cash
Cash
N-8.00

Served By: Buti Sunday Mngemshima
Thanks for your patronage!



Garki Hospital

Tafawa Balewa Way, Area 8, Garki

09-2349221

Payment Receipt

Patient's Name:
Patient's EMR ID:
Transaction Date:
Amount:
Transaction Number:
Payment Method:
Narration:
Outstanding Balance

ISRAHIM LAWAL
00000228755
2023-07-11 09:53:27
N2000
00015549941
Cash
Cash
N-8.00

Served By: Ladi Ibrahim
Thanks for your patronage!



Garki Hospital

Tafawa Balawa Way, Area 8, Garki

09-2349221

Payment Receipt

Patient's Name:
Patient's EMR ID:
Transaction Date:
Amount:
Transaction Number:
Payment Method:
Narration:
Outstanding Balance

IBRAHIM LAWAL
00000228755
2023-07-11 09:52:01
N2000
00015549928
Cash
Cash
N1992.00

Served By: Ladi Ibrahim
Thanks for your patronage!



Garki Hospital

Tafawa Balawa Way, Area 8, Garki

09-2349221

Bill Statement For IBRAHIM LAWAL (EMR #: 228755)

PERIOD: [All]

Filters: None

Item	Date	Type	Amount (₦)		Balance	Aut
			DR (₦)	CR (₦)		
Theatre Cost: Minor Wound Dressing/Sessionid15524506	07/07/2023 10:58AM	CREDIT	-	0.00	1,992.00	
Anaesthesia: Minor Wound Dressing/Sessionid15524505	07/07/2023 10:58AM	CREDIT	-	0.00	1,992.00	
Anaesthetist Fee: Minor Wound Dressing/Sessionid15524502	07/07/2023 10:58AM	CREDIT	-	0.00	1,992.00	
Surgical Fee: Minor Wound Dressing/Sessionid15524501	07/07/2023 10:58AM	CREDIT	-	2,000.00	1,992.00	
FollowUp Consultancy charges: Surgeon [Medical Officer]jid15524097	07/07/2023 10:29AM	CREDIT	-	0.00	-8.00	
Cashid15466815	29/06/2023 1:58PM	DEBIT	2,000.00	-	-8.00	
Theatre Cost: Minor Wound Dressing/Sessionid15466628	29/06/2023 1:41PM	CREDIT	-	0.00	1,992.00	
Anaesthesia: Minor Wound Dressing/Sessionid15466627	29/06/2023 1:41PM	CREDIT	-	0.00	1,992.00	
Anaesthetist Fee: Minor Wound Dressing/Sessionid15466626	29/06/2023 1:41PM	CREDIT	-	0.00	1,992.00	
Surgical Fee: Minor Wound Dressing/Sessionid15466625	29/06/2023 1:41PM	CREDIT	-	2,000.00	1,992.00	
Cashid15466367	29/06/2023 12:44PM	DEBIT	2,500.00	-	-8.00	
Consultancy charges: Family Medicine GOPDjid15466314	29/06/2023 12:34PM	CREDIT	-	2,500.00	2,492.00	
Clinical Services Chargeid15394321	19/06/2023 4:13PM	CREDIT	-	0.00	-8.00	
Bank -S/kyeid15389260	19/06/2023 9:49AM	DEBIT	30,500.00	-	-8.00	
Lab charges: Packed Cell Volume [PCV] [181-103]jid15388953	19/06/2023 9:30AM	CREDIT	-	2,500.00	30,492.00	
Acetaminophen (Tab. Paracetamol 500mg) at 9.00 eachid15388691	19/06/2023 9:11AM	CREDIT	-	162.00	27,992.00	
Ascorbic Acid (Tab. Vitamin C 100mg (per tab)) at 4.00 eachid15388690	19/06/2023 9:11AM	CREDIT	-	80.00	27,830.00	
Ampicillin + Cloxacillin (Cap. Ampicillin + Cloxacillin 500mg (1)) at 50.00 eachid15388689	19/06/2023 9:11AM	CREDIT	-	1,250.00	27,750.00	
Radiology charges: Skull [xray]jid15387926	19/06/2023 7:32AM	CREDIT	-	6,000.00	26,500.00	
IVF: Normal Saline [Used in Tasks-]jid15387916	19/06/2023 7:28AM	CREDIT	-	1,000.00	20,500.00	
A & E: Nursing Care [Used in Tasks-]jid15387905	19/06/2023 7:27AM	CREDIT	-	1,000.00	19,500.00	
Injections: T.T. [Used in Tasks-]jid15387902	19/06/2023 7:27AM	CREDIT	-	500.00	18,500.00	
Wound Dressing (Minor) [Used in Tasks]jid15387676	19/06/2023 6:10AM	CREDIT	-	1,000.00	18,000.00	
A & E: Suturing of Laceration (MO) [Used in Tasks]jid15387675	19/06/2023 6:09AM	CREDIT	-	7,500.00	17,000.00	
IVF: Normal Saline [Used in Tasks]jid15387674	19/06/2023 6:08AM	CREDIT	-	1,000.00	9,500.00	
Injections: Diclofenac [Used in Tasks]jid15387673	19/06/2023 6:08AM	CREDIT	-	500.00	8,500.00	
A & E: Gloves [Used in Tasks]jid15387672	19/06/2023 6:08AM	CREDIT	-	1,000.00	8,000.00	
A & E: RBS [Used in Tasks]jid15387671	19/06/2023 6:07AM	CREDIT	-	1,000.00	7,000.00	
A & E: Setting Up of IV Line [Used in Tasks]jid15387670	19/06/2023 6:07AM	CREDIT	-	1,000.00	6,000.00	
Ward Fee: ACCIDENT & EMERGENCYjid15387669	19/06/2023 6:05AM	CREDIT	-	5,000.00	5,000.00	
Bed charged: (Stretcher 1)jid15387668	19/06/2023 6:05AM	CREDIT	-	0.00	0.00	

Bank -Skyeid15387313	18/06/2023 10:09PM	DEBIT	2,000.00	-	0.00
Beneficiary enrollment charge - id15387311	18/06/2023 10:06PM	CREDIT	-	2,000.00	2,000.00
TOTALS			37,000.00	38,992.00	

STATEMENT TOTAL: One Thousand Nine Hundred And Ninety Two N

PATIENT OUTSTANDING BALANCE: One Thousand Nine Hundred And Ninety Two N



DATE: 17-06-2023
NAME: LAWAL IBRAHIM
SEX: MALE
AGE: 42 YEARS
EXAMINATION: CHEST XRAY (PA View)
INDICATION: ASSAULT

REPORT

The cardiac size and shape are within normal limits.
The rest of the mediastinal shadow is intact.
The trachea is central.
No hilar adenopathy is seen.
No active focal or diffuse lung lesion is seen.
Both costophrenic sulci are intact.
The demonstrated bony thorax is intact. No fracture line is seen.
The overlying soft tissue shadow is intact.

IMPRESSION: No significant abnormality is seen.

Normal Study.

KIV Myalgia

N.B: Clinical correlate is advised.



DR S.S AKINDOKUN
CONSULTANT RADIOLOGIST (MBBS, FWACS, FICS)

Abuja Branch:

No. 2 Fez Street off Kumas Crescent,
Wuse 2, FCT, Abuja.
Tel: 08155515100, 08108484623

Kaduna Branch:

Plot 153 Gado Nasco Road
beside Chezio Supermarket,
Phase 4 Kubwa, Abuja
Tel: 09136604419

Lagos Branch:

No 86 Ojo Drive Alaba Int'l Market Road,
beside Ojo Police Station, EVERIGHT BUS STOP Ojo Lagos
Tel: 08091800773 09095062446 08090053663

Owerri Branch I



29 Bark Road Opp. Garden Park
Beside Ebere Lines Filling Station Owerri, Imo State
Tel: 08168812732 0811982961 0816700131

Owerri Branch II

Shop No 7 Owerri Mall (Shoprite)
Egwa Road, Owerri Imo State.
Tel: 09066306001, 0811982965

everightlab.com

info@everightlab.com

everightlab  



Garki Hospital

Tafawa Balawa Way, Area 8, Garki

09-2319221

Payment Receipt

Patient's Name:	IBRAHIM LAWAL
Patient's EMR ID:	00000228755
Transaction Date:	2023-06-29 12:44:28
Amount:	N2500
Transaction Number:	00015466367
Payment Method:	Cash
Narration:	Cash
Outstanding Balance:	N-8.00

Served By: Igbolukwu Amanda Chidubem
Thanks for your patronage!

THIS IS THE DOCUMENT REFERRED
TO AS EXHIBIT..... IN PARAGRAPH
..... OF THE AFFIDAVIT

[Faint, illegible text, possibly a stamp or signature]





NATIONAL HOSPITAL, ABUJA

Interim Invoice

Name: SULEIMAN MANSUR
 Number: 793650
 VisitId: ADM1071439
 Address: ZARIA ROAD FATOUWA BY MARKET, KASTINA STATE.
 Scheme: null
 Id Number: null

Ward: TRAUMA RESUSITATION
 Visit Date: 21/6/2023 3:02 am
 Discharge Date: null
 Number of Days: 1 dy
 Diagnosis: null

S/N	Date	Service/Drug Description	Qty	Disc%	Invoice Number	Amount	Running Amount	Receipt	Billed By
1	21/6/2023 4:15 am	XRAY OF THE LEFT TIBIA	1.00	0.00	KRY2450944	3,500.00	3,500.00		basseyjohn
2	21/6/2023 4:15 am	Chest Xray (PA only) (Adult)	1.00	0.00	KRY2450944	5,000.00	8,500.00		basseyjohn
3	21/6/2023 7:10 am	AMOXICILLIN+CLAVULANIC ACID 1.2G INJECTION AMOKSIKLAV 1.2G	2.00	0.00	PHM2450947	2,444.00	10,944.00		femiogun
4	21/6/2023 7:10 am	TETANUS TOXOID 0.5ML INJECTION GENERIC 0.5ML	1.00	0.00	PHM2450947	266.76	11,210.76		femiogun
5	21/6/2023 7:10 am	PENICILLIN 300MG INJECTION generic 300MG	3.00	0.00	PHM2450947	912.60	12,123.36		femiogun
6	21/6/2023 7:10 am	PARACETAMOL 300MG INJECTION GENERIC 150MG/ML	6.00	0.00	PHM2450947	273.00	12,396.36		femiogun
7	21/6/2023 7:10 am	SODIUM CHLORIDE 0.9% INJECTION 500ml JUHEL 0.9%	4.00	0.00	PHM2450947	2,191.04	14,587.40		femiogun
8	21/6/2023 10:45 am	ASPIRIN	1.00	0.00	IN2451659	6,500.00	21,087.40		basseyjohn
9	21/6/2023 3:48 pm	Registration After working hours	1.00	0.00	IN2452573	2,500.00	23,587.40		abahrnabe
10	21/6/2023 3:48 pm	Bed Space & bedded (adult)	1.00	0.00	IN2452573	5,000.00	28,587.40		abahrnabe
11	21/6/2023 3:48 pm	Medical care (GENERAL)	1.00	0.00	IN2452573	2,500.00	31,087.40		abahrnabe
12	21/6/2023 3:48 pm	Nursing care (GENERAL)	1.00	0.00	IN2452573	2,500.00	33,587.40		abahrnabe
13	21/6/2023 3:48 pm	consumables weekly	1.00	0.00	IN2452573	10,000.00	43,587.40		abahrnabe

TOTAL BILL: 43,587.40

Date	Number	Total Amount
TOTAL RECEIPT(S) PAID : 0.00		

Total Discount	0.00
Total Waived Amount	0.00
Total Receipt Amount	0.00
Total Refunds	0.00
Total Drug Returned	0.00
Net Total	43,587.40

ANIRAC CID

20th June 2023

CRIMINAL CONSPIRACY AND UNLAWFUL
 BANKING CONTRACTS TO SECURE
 AND 114 OF THE PENAL CODE LAW - ON
 20th June 2023, A transferred case from Apo
 Legislative Quarters Division to the Commission
 of Police for Kenya was assigned to CID
 Kenya for further investigation. Reported by
 one Mansur Jarkaya M of NO.1, Arabaker
 Rami Crescent, Apo Legislative Quarters, Kenya
 against you Ibrahim Lawal M of N.E.S. Mombasa
 Rami Crescent Apo Kenya that on 20th
 June 2023, at about 21:30hrs you criminally
 conspired with one Nasira Abeh, Aliyu Amman,
 Nura Nasira, Babangida Umar, Yahya Abdul and
 Ibrahim Idris all M of Funtua, Katsina State,
 infiltrated Apo legislative quarters Kenya and
 acted in a manner that endangers and caused
 panic to the inhabitants of the above stated residence

And over to information by me: Ndangari Ukong Sign of Information
 Rank and Number: INSPR KIDIAWAKAST 211016

Directions of Officer in charge: Police State (if case referred state reasons)

Signed: Charge to Court Rank: CSP

Date J.R. Submitted to Court: _____ Date Warrant issued (if any): _____

Name, Age, Occupation and Address of person(s) arrested: Mansur Jarkaya M of NO.1, Arabaker Rami Crescent, Apo Legislative Quarters, Kenya

- ① Nasira Abeh ② Aliyu Amman ③ Nura Nasira
- ④ Babangida Umar ⑤ Yahya Abdul and ⑥ Ibrahim Idris all M and adult of Funtua, Katsina State

The accused brought before courts: _____
 Rank and Number: _____

Court's Order regarding investigation (if any): _____

Court File No: _____
 Signed: _____
 Court: _____

with the quick intervention ~~by~~ the men
of Nigeria Police Force For Kano. During
Police investigation, it was discovered
that you Ibrahim Kawaal criminally invited
things from Katsina state to caused mayhem
at the above mentioned address. you thereby
committed the above mentioned offences.



THE NIGERIA POLICE

STATEMENT OF SUSPECT/ACCUSED

080362

AS
54033 Bay. Osho
Police D19

STATION..... STATE..... DATE.....
NAME: Mansur Jarkasa (Sec. Mosque Committee) NATIONALITY/TRIBE: Nigerian / Hausa
AGE/SEX: 67 yrs OCCUPATION: Retired Civil Servant RELIGION: Islam
ADDRESS: No. 1, Abubakar Rimi Crescent, NASSI PHONE NO: 08033202056

I have decided to make complain against you before the Police, do you wish to make any statement? You are not obliged to say anything or answer any question or endorse or write any statement without your lawyer or any other person of your choice been present unless you wish to do so, but whatever you say shall be taken down in writing and may be given in evidence.

SIGN: *Mansur*

DATE: 21 June, 2023

On Friday 16th June, 2023 just before the night (Ashi) ^{prayer} there were some religious explanations about cleanliness of the Mosque where it was stated that the place should be kept clean and neat and should be closed after prayers and opened at another. The Chairman of the Mosque Management Committee accordingly said that some renovation works would be carried out in the Mosque and thereafter it will be locked at the end of each prayer and opened at another. The Imam of the Mosque jumped to say that the mosque must remain open all the time to allow worshippers with access all the time. The Chairman and indeed all other worshippers in the Mosque were not happy with the Imam's statement. The Chairman asked why was the Imam always against good decisions after all the sanctity of the Mosque was at stake if it will remain open all the time. In addition, our equipment and other facilities in the Mosque are not safe. There was exchange of words between the Imam, Chairman and other worshippers. The matter was closed that night. The following morning 17/6/23 after early prayers, a meeting of the Mosque Committee was convened to discuss what happened ~~at~~ the previous night. The Chairman told the meeting that under ~~normal~~ normal circumstance if an issue is being discussed in a meeting which affects a member ~~that~~ the person should keep away until the matter is decided. The Chairman therefore asked the Imam to stay off the meeting. He refused and the Chairman said he was going to leave. The Imam was moved out ~~by~~ after exchange of harsh words. The Chairman said since the atmosphere was tense the meeting could continue another time. Unhappy with the attitude of the Imam, the meeting decided to suspend the Imam from his functions. The Imam refused to accept the decision of the Committee. That evening he led the sunset prayer against the wish of the people, but at

He was moved out of the mosque. At about 2100hrs that night the Imam mobilised thugs with dangerous weapons into the NASS Qtrs. estate and was showing the thugs houses of the Committee ^{members} hitting on their gates with machets and other weapons asking them to come out. I immediately informed the police that came and made some arrests of the thugs. Some ran away including the Imam. The following morning, the Committee sat again to discuss the situation. It was noted the Imam was suspended so that he can show some ~~repentance~~ remorse and apologise. Instead, he brought thugs with dangerous weapons into the estate to cause unrest. This was view with serious concern by the Committee and eventually decided to dismiss him from the Imamship. He did not take it lightly and accordingly brought another set of thugs in the night at about 2130hrs. Police were informed again and they responded immediately. Out of the crisis, the Police made some arrest of the thugs and the Imam including dangerous weapons brought to the scene. Some Many of the thugs escaped through the backyard wall of the Mosque.

Mark

Interpreted by me

Mark
Signature/Mark of Complaint/witness/Accused/Suspect

Signed Mark
21-06-2023

This statement was taken in English Language and read over and translated in the Signature/Mark of Complaint/witness/Accused/Suspect in English Language in my presence and hearing.

Recorded by:.....
Date:.....
Time taken of statement:.....

ASB



THE NIGERIA POLICE

STATEMENT OF COMPLAINANT/WITNESS

Police P19

STATION.....COMMAND.....

NAME Mansur Jarkasa (Sec. Mosque Committee) NATIONALITY/TRIBE Nigerian

AGE/SEX: 67 yrs OCCUPATION/PROFESSION Retired Civil Servant

ADDRESS: No. 1, Abubakar Rimi Crescent, Zone B, WASS Qrts, Abuja RELIGION Islam

DATE OF COMPLAIN/WITNESS 23/06/2023 PHONE NO. 08033202056

I FREELY ELECT TO STATE AS FOLLOWS: Today 23/06/2023 at about 9:30hrs

the Mosque ^{Committee} sat down to ~~review~~ review the prevailing case of the former Imam. After considering an appeal ~~for~~ from the Imam's parents deliberated by a delegate expressing displeasure exhibited by their child (former Imam) and tendering apology to all and promised that they will ensure that he will at the end they will ~~take~~ him leave the Qrts entirely and no longer an Imam of that Mosque. The Committee expressed sadness on the whole episode and accordingly made the following resolutions ~~that~~ if and if and only if the Imam (former) agrees to the terms: They are (1) He is no longer the Imam of that Mosque (2) that he packs out of the Estate (3) that he should not be seen in the WASS Qrts, Estate, Apo ~~anywhere~~ or its vicinity any more, and (4) that he should sign ~~undertaking~~ with ~~that~~ the authorities on those conditions in addition to any attack on any Committee members and their families in and outside the Estate he will be held responsible. His ~~gu~~ The Committee asked his guardian to see him and ~~to~~ seek his consent ~~on~~ on the conditions. ~~They~~ The guardian later came back to us to inform us that he has agreed. The Committee finally resolved that if authorities will get the former Imam sign the conditions, it will have no objection suspending the case. The Committee's resolutions will have to be endorsed in writing and hereafter further process on the case should be stopped. This statement is made by me being the Secretary of the Mosque Committee that directed me to do. The name of the Imam's guardian that met with the Committee is Isdag who said to be a junior brother to the father of the former Imam.

Mansur Jarkasa 23/06/2023



THE NIGERIA POLICE
STATEMENT OF COMPLAINANT/WITNESS

Ab

Police P 19

STATION.....

PROVINCE.....

NAME: W/sgt Joy Ayodele NATIONALITY/TRIBE: Nigerian

AGE: Adult OCCUPATION: NPF SEX: Female RELIGION: Christian

ADDRESS: APO legislative quarters Police Station Fet Olaya

TEL: 07036209086 DATE: 22/06/2023

I FREELY ELECT TO STATE AS FOLLOWS:

What actually appeared was that on Saturday been 17/06/2023 at about 0730hrs One Imam Ibrahim Lawal im of NO5 Abubakar Rimi crescent APO legislative quarters came to the Station to report that he was inside the mosque at the early hour of that same date, Senator Ali Ndume told the Committee to wait behind for a special discussion, in that meeting Senator Ali Ndume told the Committee that Imam Ibrahim Lawal is no longer the Imam of this mosque again, he said when he ask why Ali Ndume call his boys and order them to beat and kill him, after his statement we went to meet Senator Ali Ndume, he was not available at that moment, our DCO Sp Sunday Adams who was only Senior officer on ground pleaded with Imam Ibrahim Lawal to go and Mentam Peace till we get Ali Ndume, he was also taking to hospital for medical treatment, after that he left, on Sunday 18/06/2023 evening prayer for the muslim, the said Imam whom the Committee suspended him wanted to lead the prayer and the people said (NO) that he can't lead, Imam call his boys from APO Panfakar, Durumi and Garki to fight any one that want to stop him from leading the prayer, the action lead to riot, we intervened

Furtua Katsina State to come and help him fight, Imam started showing those people that came from Katsina State, those came with two vehicles, and those people started making trouble! Some youth of the mosque said no, they can no longer take what Imam is doing any more that was how fight started in the mosque again about four of the boys from Katsina state was seriously injured and they were taken to National hospital for treatment and about six including Imam Ibrahim Lawal making seven were arrested, from the scene of crime, so many weapon were discovered from the boys from Katsina, the weapon are as follow, knives, Cater punt, Chams, daggers, one Gulf car with Reg No BWR 318 AJ, that was the vehicle we could gather before coming here.

~~20~~ 22/06/23

W/sgt Joy Ayodele
INTERPRETED BY THE I.P.O:

Sign: 

SIGNATURE/MARK OF WITNESS/ACCUSED

This statement was taken in the present English Language and read over and translated to the Accused/Witness English Language in my presence and hearing

Recorded by W/sgt Joy A.
22/06/2023

Time taken the statement to commence _____



THE NIGERIA POLICE
STATEMENT OF SUSPECT

B/A

Police P 19

PHONE NO: 08033233090

STATE CD STATION FIT PROVINCE
NAME Ibrahim Lawal NATIONALITY/TRIBE NIG/HAUSA
AGE 42 OCCUPATION IMAM SEX M RELIGION ISLAMIC
ADDRESS: APO LEGISLATIVE QUARTERS, ABUJA
TEL: 08033233090 DATE: 22/06/2023
I. Ibrahim Lawal

having
Been duly cautioned in English language that I am not obliged to say anything in answer to the charge
unless I wish to do so, but whatever I say will be taken down in writing and may be given in Evidence.
I voluntarily elect to State as follows:

SIGN *[Signature]* 22-06-23

I hail from Funtua village, Funtua L.G.A of Kaduna state. I attended Maikata primary school and later proceeded to Institute of Islamic Studies Gado in Kaduna state. I came to Abuja in the year 1999 and since then till date (I am) remain an Islamic clergy where I presently serve as an Imam of APO Legislative Quarters Mosque. On the 17/06/2023 at around 1230 noon I reported against Senator Ali Ndume at APO Legislative Quarter police station when he sent his boys including his children to come to the Mosque where I serve and beat me up after the prayer and thereafter, the same Senator Ali Ndume took up the Mosque and as the result of the beating they hit me with wood to the extent that I sustained a serious injury on my head and when my boys saw how I was beaten by Senator Ali Ndume

I warned them not to do so which they obeyed me, and on the following day, I managed to come out in the afternoon for prayers I did my ablution and went into the Mosque to call for prayers but surprisingly, the same Senator Ali Adnan's boys came in again and attacked me to the extent of tearing my microphone forcefully and pushed me inside and disallowed me to call for prayers where I was until after the prayer and that was when I went back to the police station to report to the police again but the D.O was not around though he was informed of + I developed a boy on phone. Then on the 20/6/2023 when I returned from the hospital, some of my relatives and well-wishers both from K. Dima and within A.D. visited me. I on the process of our discussion, Senator Ali Adnan's boys came into my view within the Mosque premises and I attacked us with weapons in kindling matchsticks and sticks and a police was invited to my house, a boys who were sent by Senator

INTERPRETED BY ME:

signed: _____

SIGNATURE/MARK OF WITNESS/ACCUSED

This statement was taken in the _____

English

Language and read

over and translated to the Accused/Witness

English

Language, in my presence and bearing

Recorded by _____

Time taken of statement Commenced _____



THE NIGERIA POLICE

B P.

STATEMENT OF SUSPECT/ACCUSED

Police D19

SCS STATION FCT STATE Abuja DATE 22/06/2023
NAME: Ibrahim Lamsal NATIONALITY/TRIBE NIG. HAUSA
AGE/SEX: 40/M OCCUPATION IMAM RELIGION ISLAM
ADDRESS Abu Legislature OTS PHONE NO: 08033233090

I have decided to make complain against you before the Police, do you wish to make any statement? You are not obliged to say anything or answer any question or endorse or write any statement without your lawyer or any other person of your choice been present unless you wish to do so, but whatever you say shall be taken down in writing and may be given in evidence.

SIGN: Cms

DATE: 22-06-23

Ali Ndume over-powered the police and my visitors were beaten and injured. It is also interesting to note that as result of my earlier report to the police at Abu Legislature Quarters Division, Senator Ali Ndume was invited to the station where he refused to appear before the police and even when the police got an information that he was in his office but before they got there, he had nowhere to be found and since then had refused to honour police invitation along with his boys. On the day of my attack, it was Senator Ali Ndume who shouted "Baba" beat him and kill him and on the process myself and some of my brothers got serious injuries and were taken to the hospital by the police where they are presently on admission, and at the moment, I do not know the state of their health and their whereabouts, while Senator Ali Ndume and his boys who attacked me and my brothers are still moving freely without being arrested by the police. I have served as an Imam at the Abu Legislature

problem until recently when Senator Ali Ndume agitated that I should be suspended for no reason which is the cause of the crisis. (I do not know) Senator Ali Ndume does not know how the Mosque was built and who built it, he only came in and joined us to worship in the Mosque. In addition, the people who came from Katsina did not come to my house but came to visit their brothers who are politicians in different part of the FCT, but it was when they heard of what happened to him that they decided to visit me in APO Legislative Quarters where Senator Ali Ndume and his boys invaded us in my house. The son of Mansur Jarkas who is the secretary of the Mosque was among those who attacked me and my visiting brothers, and his name is Dibi Mansur Jarkas.

Interpreted by me

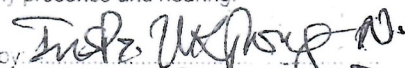


Signature/Mark of Complainant/Witness/Accused/Suspect

Signed:

This statement was taken in English Language and read over and translated in the Signature of of
Complainant/Witness/Accused/Suspect in English Language in my presence and hearing.

Recorded by



Date

02-06-2023



THE NIGERIA POLICE

B2

STATEMENT OF SUSPECT/ACCUSED

Police D19

SCED STATION: FIT STATE: ABUJA DATE: 22/06/2023
NAME: NASIRU ABBA NATIONALITY/TRIBE: NIGERIAN/HAUSA
AGE/SEX: 44YRS/M OCCUPATION: DRIVER RELIGION: ISLAMIC
ADDRESS: FUNTUA, KATINA PHONE NO: 08069222331

I have decided to make complain against you before the Police, do you wish to make any statement? You are not oblige to say anything or answer any question or endorse or write any statement without your lawyer or any other person of your choice been present unless you wish to do so, but whatever you say shall be taken down in writing and may be given in evidence.


SIGN: 

DATE: 22-06-23

I am an indigene of Funtua in Katsina state and a driver who applies for journey usually Katsina to Abuja. I am married with children. On the 22/06/2023, I was at Funtua Motor Park washing my car where one of the Union members approached me that there were some passengers who wanted to head towards Abuja and when I met with them, we bargained and agreed on the sum of ~~fourty~~ forty thousand naira "₦40,000.-". Only and I drove them Saely to Aho bridge in Abuja about nine of them and on getting to Aho bridge, one of the passengers made a phone call to who I did not know and they were asked to come to Aho Police Station Quarters where I took them there by one Mosque where they all came down and went into the Mosque and on the process of trying to turn my car to go out of the gate, I was held from behind by a man in plain cloth who asked me what I was doing there and I explained to him that I brought some passengers to the area and that I was not

Identify one of those who attacked
me by name Dini Mounsi and he
came with a cutlass

Interpreted by me

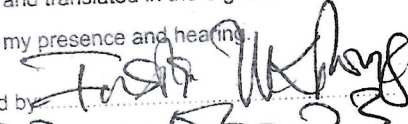

Signature/Mark of Complaint/witness/Accused/Suspect

Signed.....

20.....

This statement was taken in.....^{English} Language and read over and translated in the Signature/Mark of

Complaint/witness/Accused/Suspect in.....^{English} Language in my presence and hearing

Recorded by 

Date: 22-06-25

Time taken of statement commenced.....



THE NIGERIA POLICE

B3

STATEMENT OF SUSPECT/ACCUSED

Police D19

STATION..... STATE..... DATE.....
NAME: ALIJU ANAMAN NATIONALITY/TRIBE: NIG./HAUSA
AGE/SEX: 26YRS/M OCCUPATION: DRIVING RELIGION: ISLAMIC
ADDRESS: FUSILLA KATSINA PHONE NO: 08144108404

I have decided to make complain against you before the Police, do you wish to make any statement? You are not oblige to say anything or answer any question or endorse or write any statement without your lawyer or any other person of your choice been present unless you wish to do so, but whatever you say shall be taken down in writing and may be given in evidence.

SIGN: [Signature]

DATE: 22-06-23

I am an indigene of fusilla village in Katsina state. I attended both primary and secondary school in fusilla, Katsina state. I am a driver by profession and married with two kids. On the 20/06/2023 at about 2pm, myself and eight of my brothers left fusilla in Katsina state to Abay to visit one of our brothers by name Mallam Usama who is bearing Imam Ibrahim Lawal as a result of an injury he sustained and on our arrival at the FCT, we put a phone call to Jim who came and met us and as we were discussing, the police came and met with the Imam and both of them were discussing but I did not pay any attention to what they were discussing and after few minutes, we were asked to follow them to the police station and while at the station, we saw the police bringing other of our people with injuries to the station. We did not collect money from anybody to come to Abay but to come and greet the Imam for the injury he sustained because he used to be very good to

THE NIGERIAN POLICE
STATEMENT OF ACCUSED*

B4
Police D 19

SCU
Name: NURA NASIRU Station: Date:
Age/Sex: 32-MS/M Nationality/Tribe: NIG/HAUSA
Occupation: BARBER Religion: ISLAMIC
Address: FUNTUA, KATSINA STATE
Marital Status: MARRIED Phone Number: 08162894643

NURA NASIRU having been duly cautioned in English Language that I am not obliged to say anything unless I wish to do so, but whatever I say will be taken down in writing and may be given in evidence. I freely elect to state as follows:

Signed: 

I am an indigene of Funtua village in Funtua L.G.A of Katsina State. I attended both primary and secondary school both in Funtua in Katsina State. I am married with eight children and a barber by profession. On the 20/06/2023, I was on my shop at Funtua where one Kabiru called me that we will be going to Abujah to meet one of their brothers who is an Imam who was injured by some people and immediately they arrived the Imam's house in Abujah, some group of people came and attacked them including the Imam and before we knew, police came and arrested all of us to the station and we were detained. He did not come to Abujah with any weapon, it was the Secretary of the mosque and his boys who used the recovered machetes and daggers to attack us, and.

also brought them the following day
to the Station while we were
all in the detention. The D.P.O
of the Station properly searched us
and our vehicle without recovering
any weapon. It was the Secretary
of the Mosque who came with his
black vehicle and brought out all
those weapons and handed over
to the police ~~and~~

Interpreted by me:


Signature/Mark of Witness/Accused

Signed:.....

This statement was taken in the..... language and read over and
translated to the Accused/Witness..... language in my presence and
hearing

Recorded by.....

22-06-23

Time taking of statement commenced.....

Time taking of statement completed.....

25

THE NIGERIAN POLICE
STATEMENT OF ACCUSED*

SCW Station 22-06-23 Date
Name BABANGIDA Umar Nationality/Tribe NIG/HAUSA
Age/Sex 20yrs/M Occupation TRADING Religion ISLAMIC
Address FUNTUA, KATSINA
Marital Status MARRIED Phone Number:

I, BABANGIDA Umar having been duly cautioned in English Language that I am not obliged to say anything unless I wish to do so, but whatever I say will be taken down in writing and may be given in evidence. I solemnly elect to state as follows:

Signed: N

I am an indigene of Funtua village in Funtua L.G.A of Katsina state. I attended Islamic school in Funtua, and I am into trading and also married with two kids. On 20/06/2023 myself and eight others came to Abuja from Funtua to meet Imam Usman Ghouse we were told sustained injuries and we were informed by one Kabon which as a result we picked a taxi to come and visit him and on our arrival got into his house but so surprisingly some people in a large number came in and attacked all of us before the police came and took us to the station. N

B 6

THE NIGERIA POLICE



STATEMENT OF SUSPECT/ACCUSED

Police D19

SCD STATION FCT COMMAND ABUJA
 NAME YADAYA ABDEL NATIONALITY/TRIBE NIG./HAUSA
 AGE/SEX 35/M OCCUPATION/PROFESSION P.O.P
 ADDRESS FUTUA KATSINA RELIGION ISLAM C

SUSPECTED/ALLEGED OFFENCE

DATE OF ARREST.....PHONE NO. 08131915664

I YADAYA ABDEL Having been duly cautioned in English Language that I am not obliged to say anything in answer to the charge(s) unless I wish to do so, but whatever I say will be taken down in writing and may be given in Evidence. I voluntarily elect state as follows:

Sign: [Signature] Date: 22-06-23

I am an indigene of Futuwa in Katsina state and attended both primary and secondary school in Futuwa, Katsina state. I am married with three kids. On the 20/06/2023 myself and eight of my brothers took a taxi from Futuwa to Alays to come and greet one of our brothers by name Ahmad Ibrahim and on getting to his house, a large number of persons with weapons come in and attacked him and all of us who were there including our bodies. An after few minutes, some police officers came and took us to the station where other people who were injured were also brought to the station.



SHEIKH ABUBAKAR MAHMUD GUMI GUEST INN

Plot 853 Cadastral Zone co² Life Camp Abuja FCT
TEL: 08033023134, 08057043070

CASH RECEIPT

AN 08

Date: 21-07-23

No. 1572

Received from Imam Ibrahim Lawal

The sum of Twenty eight thousand

Naira Twenty Kobo

Being payment for Accommodation for four nights
to expire on 25-07-23 By 12:30 pm

N 28,000 :00K


Authorized Signature



SHEIKH ABUBAKAR MAHMUD GUMI GUEST INN

Plot 853 Cadastral Zone co² Life Camp Abuja FCT
TEL: 08033023134, 08057043070

CASH RECEIPT

RN 08

Date: 17-07-23

No. 1570

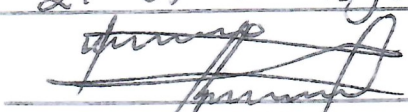
Received from Imam Ibrahim Lawal

The sum of Twenty eight thousand

Naira Only Kobo

Being payment for Accommodation for four
nights to expire on 21-07-23 By 12:30

N 20,000 : 00K


Authorized Signature

STATE OF CALIFORNIA
OFFICE OF THE ATTORNEY GENERAL

RECEIVED FROM: [Faint text]

REV 07/09
1569

DATE: 05-07-23

RECEIVED FROM: Inman Ibrahim Lawal

THE SUM OF: Fifty Five thousand noona

FOR: Accommodation of 2 rooms
for 4 nights to expire on 10-07-23

BY: [Signature]

55,000.00

[Signature]
[Faint text]

01-07-23

AN 07,09
1566

Inam (Galian) Laxar

Eighty thousand rupees

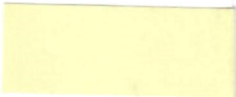
Accumulation of Rupees
for 9 months

80,000 00

[Signature]

THIS IS THE DOCUMENT REFERRED
TO AS EXHIBIT IN PARAGRAPH
OF THE RESOLUTION

RECEIVED
1923
OFFICE OF THE
COMMISSIONER
OF LAND REVENUE
MADRAS



IN THE HIGH COURT OF THE FEDERAL CAPITAL TERRITORY ABUJA
IN THE ABUJA JUDICIAL DIVISION
HOLDEN AT ABUJA

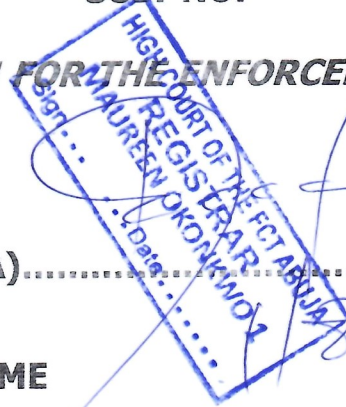
SUIT NO:

IN THE MATTER OF AN APPLICATION FOR THE ENFORCEMENT OF THE APPLICANT'S FUNDAMENTAL RIGHT

BETWEEN:

IBRAHIM LAWAL (AKA MALAM USAMA).....APPLICANT
AND

- 1. SENATOR MOHAMMED ALI NDUME**
- 2. MANSUR JARKASA**
- 3. CSP, IBEH CHUKWUDI AP/NO.:87678.....RESPONDENTS**



WRITTEN ADDRESS IN SUPPORT OF THE MOTION ON NOTICE

1.00 INTRODUCTION

1.01 This is an application for the grant of the Applicant's Fundamental Right to personal liberty, dignity of human person, freedom of movement and right to family life brought pursuant to Order 4 Rules 3 & 4 (c) of the Fundamental Rights (Enforcement Procedure) Rules, 2009.

2.0 BRIEF FACTS

2.01 The facts here are the same as those deposed to in the affidavit supporting this application and which said facts are most humbly adopted here as well.

3.00 ISSUE FOR DETERMINATION

3.0.1 The Applicant respectfully submit a lone issue for determination, that

'Whether the Respondents' arrest, intimidation, harassment, assault, beating and threat of re-arrest and detention of the Applicant constitute a violation of his Fundamental Right to liberty, dignity of human person, right to private and family life as guaranteed under section 34 (1), 35 (1) & (4), 37 (1), 41 (1), 43 and 46 (1) of the 1999 Constitution of the Federal Republic of Nigeria'

4.00 ARGUMENTS

4.01 Respectfully my lord, we have filed a 23-paragraph affidavit in support of this application.

4.02 We humbly rely on all the averments in the paragraphs of the said affidavit.

4.03 We urge my noble lord to resolve the lone issue in favour of the Applicant.

4.04 The law is settled that every person is entitled to his fundamental rights enshrined in chapter IV of the Constitution and any person who alleges that such right has been, is being, or likely to be contravened can go to Court to enforce same.

4.05 Order 2(1) of the Fundamental Rights (Enforcement Procedure) Rules, 2009 provides thus:

"1. Any person who alleges that any of the Fundamental Rights provided for in the Constitution or the African Charter on Human and Peoples' Rights (Ratification and Enforcement) Act and to which he is entitled, has been, is being, or is likely to be infringed, may apply to the Court in the State where the infringement occurs or is likely to occur, for redress"

4.06 The Court of Appeal held thus in the case of **Onyirioha v. I.G.P. (2009) 3 NWLR (Pt. 1128) Pg. 342 at 362 para-H:**

"It has to be noted as I have said elsewhere, that by the provision of section 35(1) and (6) of the 1999 Constitution of the Federal Republic of Nigeria, every citizen of the country is entitled to his personal liberty and no person shall be deprived of his liberty except as stipulated by the Constitution or statute."

4.06 We submit most respectfully my lord, that the Applicant's right to personal liberty as enshrined under section 35 of the constitution and Article 6 of the African Charter is violated. The facts deposed to in the affidavit supporting this application showered there was an arrest and detention for nine (9) days. We refer my lord to paragraphs 9 to 10 of the Applicant's affidavit in support of this application.

4.07 Article 6 of the African Charter on Human and Peoples' Rights (Ratification and Enforcement) Act, Chapter A9 (Chapter 10 LFN 1990) provides thus:

"Every individual shall have the right to liberty and to the security of his person. No one may be deprived of his Freedom except for reasons

- 4.11 My lord, the Applicant deposed in paragraphs 9 to 10 of his affidavits in support of the application thus;
- a. *"...That the Applicant and six (6) other of his relatives were arrested and detained by the 3rd Respondent in the Apo Divisional Police station's cell and held in detention for two (2) days from the 20th day of June, 2023 to 22nd day of June, 2023 without anyone stating in clear terms the offence for which they were detained.*
 - b. *That on the 22nd day of June, 2023 the 3rd Respondent took the Applicant and the six other persons to the Police FCT-Command and detained all of them at SARS for four (4) days from 22nd to 26th day of June, 2023.*
 - c. *That on the 26th day of June, 2023 the Applicant and the Six (6) other persons were charged to a Magistrate Court, Karu for conspiracy and inflicting public disturbances via FIR-CR/09/23. They all pleaded not guilty. Court granted them bail, after fulfilling the bail conditions, they were released on bail...*
 - d. *That on the 12th day of July, 2023 the Applicant was advised to go back to his house and continue leading prayers in the mosque. On getting there, he led prayer successfully without any hitches and people followed him. After the prayers some community members sympathized with him. unknown to him, the 1st and 2nd Respondents instigated/facilitated the 3rd Respondent to come and re-arrest the Applicant and detained him in the police custody for three (3) days from 12th to 14th day of July, 2023 despite the fact that the matter is pending before the Magistrate Court, Karu, and the court granted him bail.*
 - e. *That the Applicant was later released by the police on bail after he provided a surety. However, was directed to report on the 17th day of July, 2023. Before he left, one CSP, Aliyu Umar Ruwandorawa warned the Applicant that if he dares go back to his house and re-unite with his family, police will re-arrest and detained him again..."*
- 4.12 Arising from the foregoing facts as established by the Applicant in his affidavit, we humbly submit that the Applicant has established the facts that his right has been violated by the Respondents.
- 4.13 My lord, we further submit that the Applicant has established by his affidavit that the Respondents mobilized mobs that have beaten and assaulted him, inflicted injury on his head thereby caused him intense pain to his body. He also established that the continues harassment as well as threat of arrest and harm on his person deprived him of access or opportunity to re-unite

with his family as a result of fear of physical cruelty which may endanger his life or health from the Respondents or mobs as mobilized by them.

4.14 We submit with respect, therefore, that the arrest and detention of the Applicant by the 3rd Respondent for nine (9) days and threat to re-arrest and humiliate the Applicant is a gross violation of the Applicant's Fundamental Right to Personal Liberty and we urge my lord to so hold.

4.15 We further submit, my lord, that where the right of an individual has been infringed and is likely to be trampled upon, as in the instant case, the Court is enjoined to step in and protect that individual from any such abuse. In **Nama V. Attorney General of Cross Rivers State** (2008) All FWLR Pt. 401 Pg. 818 the Court held thus:

"It is the duty of the Court to safeguard the Rights and liberties of the individual and to protect him from any abuse or misuse of power."

4.16 In **Akeluga V. B.S.C.S.C.** (2002) All FWLR Pt. 123 Pg. 262, the Court held thus:

"Where fundamental rights are clearly enacted in the Constitution, as in Nigeria, the provisions take precedence over all other statutes or legislations on the same matters, including any rules or regulations. Where a citizen or a person in Nigeria runs to the Court of the land to cry that his fundamental rights of fair hearing have been infringed, by the Government or its organs or agencies or any person in authority over him, the Court is bound to look into and address the matter judicially and judiciously. The Constitution gives an open and unrestricted access to the Courts to every person."

4.17 We further refer to the case of **Abacha V. Fawehinmi** (2000) All FWLR (Pt. 4) Pg. 547 where the Court held thus:

"The African Charter, like Chapter IV of the 1979 and 1999 Constitutions of Nigeria, gives to the citizens of member states of the organization of the African Unity Rights and obligations. These Rights and obligations are to be enforced by our Courts if they must have meaning."

4.18 We submit most humbly that, what the Applicant has gone through and is facing from the action of the Respondents are violation of his rights to dignity of human person among other rights duly protected by the 1999 constitution. In **Abubakar v. Nasamu (No. 1) (2012) 17 NWLR (Pt. 1330) 407**. The Court of Appeal held thus;

"... portion of the above stated provision relevant to the complaint of the Respondent before the lower Court is Section 34(a) "no person shall be subjected to torture or to inhuman or degrading treatment". The authors of the 5th Edition Black's Law Dictionary defined the word "torture" as "to inflict intense pain to body or mind for purposes of punishment, or to extract a confession or information, or for sadistic pleasure", "inhuman treatment" as "such mental or physical cruelty or severity as endangers the life or health of the party to whom it is addressed or creates a well-founded apprehension of such danger" and "degrading" treatment as "reviling; holding one up to public obloquy; lowering a person in the estimation of the public; exposing to disgrace, dishonor or contempt". Thus, any action which inflicts intense pain to the body or mind of a person or any act of physical cruelty which endangers the life or health of a person or creates a well-founded apprehension of such danger or an act done in such a manner as to bring a person to public ridicule, disgrace, dishonor or contempt comes within the provision of Section 34(a) of the 1999 Constitution - Uzuokwu vs Ezeonu II (1999) 6 NWLR (Pt.200) 778. In Alhaja Mogaji & Ors Vs Board of Customs and Excise & Anor (1982) 2 NCLR 522.

4.19 It is our contention that the facts and circumstances of this case have clearly denoted the innocence of the Applicant. We submit that the continue intimidation and harassment of the Applicant pursuant to the 1st and 2nd Respondent's instigation, constitutes a grave violation of the Applicant's Fundamental Right.

4.20 We submit further, my lord, that the Courts, this Honourable Court inclusive, have always ensured citizen's rights are protected and prevented from being abused or breached except in the circumstances permitted by the law. The Supreme Court in the case of **Inusa Saidu V. The State** (1982) 4 SC Pg. 41 at 66-70 held thus:

"It does not give the Court any joy to see offenders escape the penalty they deserve, but until they are proved guilty under appropriate law in our Courts, they are entitled to walk about in our streets and tread the Nigerian soil and breathe the Nigerian air as free and innocent men and women."
(Underline mine for emphasis).

4.21 The Court of Appeal also held in the case of **Comptroller of Nigerian Prisons V. Adekanye** (1999) 10 NWLR (Pt. 623) Pg. 400 at 426 paras G-H:

"Freedom is no doubt the greatest gift or heritage of man. Omnipotence created man and accorded him with divine freedom. Men are born free with liberty to think what they will, to say what they will and to go where they like, all in a lawful manner, without let or hindrance from any persons, private or governmental authorities. It therefore follows that, generally, detention of a man by a fellow man is in violation of the law of God and man. I am not oblivious of the fact that there are checks and balances to the series of freedom given to man."(Underline mine for emphasis)

4.22 We submit in the light of the foregoing authority that a person whose fundamental right has been infringed upon by a private individual can maintain an action under the Fundamental Rights (Enforcement Procedure) Rules. Victims of human rights infringement inflicted by private persons are not precluded from seeking redress under the fundamental rights as redress that may be pursued under that procedure is not limited to infringement committed by Government agencies. See **Cletus Madu v. J.S. Neboh (2002) 2 CHR 67.**

5.00 CONCLUSION

5.01 We submit in conclusion my lord, that the action of the Respondents and the barbaric action they took on the Applicant is oppressive, arbitrary and abuse of office and powers and consequently unconstitutional and unlawful. See **Odogwu v. AG Federation (1996)6 NWLR (Pt. 456) P. 508 @ 519.**

5.02 We urge my lord to so hold and grant this application as prayed.

6.00 LIST OF AUTHORITIES

6.01 STATUTORY

6.1.1 The Constitution of the FRN, 1999 (as amended)

6.1.2 African Charter on Human and Peoples' Rights (Ratification and Enforcement) Act, Chapter A9 (Chapter 10 LFN 1990)

6.1.3 The Fundamental Right (Enforcement Procedure) Rules 2009.

6.02 JUDICIAL

6.2.1 Onyirioha v. I.G.P. (2009) 3 NWLR (Pt. 1128) P. 342

6.2.2 Nama v. Attorney General of Cross Rivers State (2008) All FWLR Pt. 401 P. 818

6.2.3 Akeluga v. B.S.C.S.C. (2002) All FWLR Pt. 123 P. 262

6.2.4 Abacha v. Fawehinmi (2000) All FWLR Pt. 4 P. 547

6.2.5 Inusa Saidu v. The State (1982) 4 SC Pg. 41

6.2.6 Comptroller of Nigerian Prisons v. Adekanye (1999) 10 NWLR (Pt. 623) P. 400

6.2.9 McLaren V. Jennings (2003) 3 NWLR (Part 808) page 470 at 484 CA.

6.2.10 Afribank Nig. Plc V. Onyima (2004) 2 NWLR (part 858) page 654 at 680

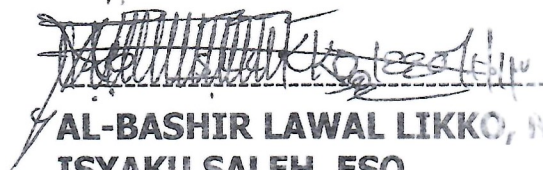
6.2.11 P. & C.H.S. Co. Ltd v. MIGFO (NIG) LTD (2012)18 NWLR (Pt. 1333), Pg. 555.

6.2.12 CPC v. LADO (2011) 14 NWLR (Pt. 1266) Pg. 40, @ 74 Paras G-H,

6.2.13 Cletus Madu v. J.S. Neboh (2002) 2 CHR 67.

6.2.14 Odogwu v. AG Federation (1996)6 NWLR (Pt. 456) P. 508 @ 519.

Dated this 20th day of July, 2023



**AL-BASHIR LAWAL LIKKO, NP, FNILA, FICMC, AIFP
ISYAKU SALEH, ESQ.
IBRAHIM AL-HASSAN, ESQ.**

**MUHAMMAD NOOR ALIYU, ESQ.
GABRIEL CHIKWADO EZE, ESQ.
MUS'AB AWWAL MU'AZ, ESQ.
MUBARAK AHMAD DANTATA, ESQ.
APPLICANT'S COUNSEL,
LIKKO & ASSOCIATES
ITF HOUSE, 4TH FLOOR, SUITE 4, LEFT WING,
ADETOKUNBO ADEMOLA CRESCENT OFF,
AGUIYI IRONSI STREET MAITAMA,
FCT-ABUJA.
+23480-3721-5278, 23480-9354-7936
allikko339@nigerianbar.org
meetlikkoandco.office@q.m.pii.com
likkoassociates.lawfirm@gmail.com
likkoandco.officeabuja@yahoo.co.uk**

FOR SERVICE ON:

1. THE 1st RESPONDENT,

Senator Mohammed Ali Ndume,
National Assembly Complex,
Senate Building
Three Arms Zone
Central Business District,
FCT-Abuja.

OR

House 56, Chuba Okadigbo Street
Zone B, Apo Legislative Quarters
FCT-Abuja.

2. THE 2nd RESPONDENT,

Mansur Jarkasa,
No. 1, Abubakar Rimi Crescent,
Apo. Legislative Quarters,
Zone B, FCT-Abuja.

3. THE 3rd RESPONDENT,

CSP, Ibeh Chukwudi AP/No.87678,
DPO, Apo Divisional Police Station
Apo, Legislative Quarters
FCT-Abuja.