JONAHCAPITAL NIGERIA LIMITED

8th December, 2025

Hon. Muktar Tolani Shagaya
House of Representatives,
National Assembly Complex,
3 Arm Zone, Abuja,
FCT, Nigeria.

HON. MUKTAR TOLANI SHAGAYA
Member Representing Abaji/Kwali/Kuje
Federal Constituency, Abuja
DEPUTY CHAIRMAN
COMMITTEE ON BASIC EDUCATION

Dear Honourable,

PETITION ON THE UNLAWFUL EXPROPRIATION OF SHARES, EXTRAJUDICIAL REMOVAL OF DIRECTORS AND RETROSPECTIVE INVALIDATION OF CORPORATE FILINGS OF JONAHCAPITAL NIGERIA LTD AND HOUSES FOR AFRICA NIGERIA LTD BY THE REGISTRAR-GENERAL OF THE CORPORATE AFFAIRS COMMISSION (CAC), MR. HUSSAINI ISHAQ MAGAJI, SAN

We are foreign investors and nationals of the Republic of Ghana who have, for almost two decades, invested in Nigeria through our companies **JonahCapital Nigeria Ltd** and **Houses For Africa Nigeria Ltd**.

Our investments, particularly in the development of River Park Estate, Lugbe, represent substantial foreign direct investment and a long-term commitment to Nigeria's economy. It is therefore with deep concern that we bring this petition before the Honourable Chairman and Members of the House Committee on Public Petitions, as the recent actions of the Registrar-General of the Corporate Affairs Commission (CAC) threaten not only our lawful investments but also the security upon which foreign investors rely when doing business in Nigeria.

Our Petition is against the Registrar-General of the Corporate Affairs Commission (CAC), Mr. Hussaini Ishaq Magaji SAN, over the expropriation of our companies' shares, removal of duly registered directors, and retrospective invalidation of corporate filings in JonahCapital Nigeria Ltd and Houses For Africa Nigeria Ltd.

By way of background, JonahCapital Nigeria Ltd is the Head Lessee and Developer of River Park Estate, Lugbe, while Houses For Africa Nigeria Ltd is its development partner.

Sometime in 2023, we observed that two former directors were illegally developing and selling the properties of the company within River Park Estate. Consequently, we briefed our attorneys, who instituted several cases with suit numbers **CV/4221/24, CV/4222/24, CV/4223/24, FCT/HC/CV/1789/2025, and CV/2330/25**. On their part, rather than file a defence on the merits, the defendants made criminal allegations aimed at weakening our cases in court. Eventually, they succeeded in manipulating law enforcement agents, which led to the filing of a criminal charge against the directors of our company.

Consequently, we approached the Office of the Honourable Attorney General of the Federation after losing confidence in the handling of the matter by the Nigerian Police.

The Honourable Attorney General of the Federation took over the case and directed the Nigerian Police to halt further action.

In anticipation of possible interference with our corporate records by the adverse claimants, we wrote to the Corporate Affairs Commission requesting that a caveat be placed on our files to preserve the integrity of our records. This request was granted.
[Copies of our letters are attached]

On 20th August 2025, we received a letter from the CAC referencing a report signed by one DCP Akin Fakorede, requesting the expungement of our companies' filings spanning nearly fifteen (15) years, on the basis of that police report.

We submitted our response on the 23rd September 2025.
[A copy of our response is attached]

In addition to forwarding our response, we instituted an action against the Corporate Affairs Commission, Suit No. **FHC/ABJ/CS/2391/2025: JonahCapital Nigeria Ltd & Anor v. Corporate Affairs Commission & Anor.** The purpose of this suit was to preserve the companies' records while the corporate dispute was pending, as only the Federal High Court has jurisdiction over company

and shareholder disputes. The Court processes and the Motion for Injunction were duly served on the Registrar-General.

To our utter shock, on Monday, 8th December 2025, upon checking the company status report, we discovered that the entire corporate records of our companies had been cancelled by Mr. Magaji SAN. The implication is that we have now been reduced to minority shareholders in JonahCapital Nigeria Ltd, while our shares in Houses For Africa Nigeria Ltd have been effectively expropriated.

From the inception of the ownership dispute, only three (3) filings were ever in contention, and these very filings are the subject of the pending suit before the Federal High Court. The Registrar General was duly served with the processes weeks before he took the administrative actions complained of. **[Proof of service is attached]**

Despite this knowledge, the Registrar-General reversed even filings that had existed for almost twenty (20) years and were never in dispute.

The Nigerian Constitution is clear that all issues relating to corporate governance and disputes arising from it fall squarely within the exclusive jurisdiction of the Federal High Court pursuant to Section 251(1)(e) of the 1999 Constitution (as amended).

By unilaterally cancelling filings, altering directorship records, and expropriating shareholdings, the Registrar-General exercised judicial powers that the Constitution reserves exclusively for the Courts.

As a Senior Advocate of Nigeria, the Registrar-General is fully aware of the settled legal position that once a party is served with an application for injunction, that party must maintain the status quo and refrain from taking actions capable of rendering the Court's eventual decision nugatory.

The consequences of the Registrar-General's actions are grave, and we respectfully enumerate them below:

1. Mr. Magaji's action is likely to have far-reaching adverse implications on our investment in River Park Estate, destabilising the ownership and management structure of the companies and creating the risk of unprecedented economic losses.

2. The unilateral cancellation of filings is likely to undermine the companies' banking and financial relationships, thereby destabilising their operations.

3. In the pending civil matters instituted by our legal representatives on behalf of the companies, the Registrar-General's actions may now render the companies incapable of defending themselves. The result is that the adverse party may now be artificially positioned as both Plaintiff and Defendant.

4. By his actions, the Registrar-General has effectively granted administrative victory to one side of a dispute that is already before the Court.

5. The CAC had, in 2023, expressly directed all companies with foreign participation to increase their share capital to ₦100 million, which we promptly complied with to avoid penalties and regulatory sanctions.

6. By cancelling filings dating back nearly two decades, the companies have now been placed in automatic default of the CAC's own regulatory requirements, as their share capital now reads as only 1 million shares, exposing them to penalties and operational disruption.

7. The abrupt cancellation compromises our ability to manage ongoing projects and safeguard our subscribers, land, and other assets.

8. It also exposes our staff both local and foreign to the risk of wrongful termination by individuals whom the Registrar-General has now administratively positioned as managers of the companies.

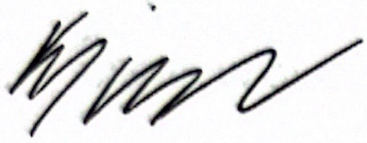
In addition to the foregoing, following the unconstitutional and unlawful alterations made by the Corporate Affairs Commission to the corporate records of our companies, the adverse claimants have embarked on acts of clear vindictiveness and unlawful interference with our operations by writing to our bankers using our company letterhead without authorization to instruct them to close our corporate accounts, and have further written to the Honourable Minister of the Federal Capital Territory seeking official recognition as the owners and developers of River Park Estate.

In view of the above, we respectfully urge the Honourable Committee, pursuant to its constitutional and parliamentary oversight powers under the Constitution (as amended), to thoroughly investigate this matter, intervene appropriately, and direct the Registrar-General of the Corporate Affairs Commission to immediately reverse the administrative actions and restore the companies' records to their lawful and original status retroactive to the date of incorporation.

We trust this Honourable Committee to protect us from administrative overreach and abuse of office.

Kindly accept the assurances of our highest regards.

Sincerely,



.....

Kojo Ansah Mensah

MD/CEO

FORM 3
(O.3, R.9)

IN THE FEDERAL HIGH COURT OF NIGERIA
IN THE ABUJA JUDICIAL DIVISION
HOLDEN AT ABUJA

SUIT NO: FHC/ABJ/CS/ 2391 /2025

FEDERAL HIGH COURT ABUJA
PAID
CASHIER:

BETWEEN:

1. JONAHCAPITAL NIGERIA LIMITED
2. HOUSES FOR AFRICA NIGERIA LIMITED } **PLAINTIFFS**

AND

1. CORPORATE AFFAIRS COMMISSION
2. ADENIRAN OLATOKUNBO OGUNMUYIWA } **DEFENDANTS**

ORIGINATING SUMMONS

LET the **Corporate Affairs Commission of Plot 420, Tigris Crescent, Off Aguiyi Ironsi Street, Maitama, Abuja,** and **Adeniran Olatokunbo Ogunmuyiwa** of Plot 1088, River Park Estate, Lugbe Abuja, FCT, within thirty (30) days after service of this summons on them, inclusive of the day of such service cause an appearance to be entered for them to this Summons which is issued upon the application of **JonahCapital Nigeria Limited and Houses for Africa Nigeria Limited** of C3/259, Richard Jonah Crescent, Off Shehu Musa Yar'adua Way, Airport Road, Abuja, FCT, who claim the reliefs set out in this Originating Summons, and who seeks the determination of the following questions, to wit:

QUESTIONS FOR DETERMINATION:

1. **WHETHER** by the combined effect of a Shareholders' Agreement executed in 2007, Heads of Agreement executed on 1st June 2012, the 2nd Defendant's letter dated 1st July 2017, Letters of Relinquishment of Shares filed on 27th August 2008, an Agreement of Sale attached as Annexure A to the Shareholders' Agreement dated 5th December, 2007,

[illegible]

Name :
Designation :
Address :
Date & Time :
Signature / Stamp :

[illegible]

Name :
Designation :
Address :
Date & Time :
Signature :

CT+

IN THE FEDERAL HIGH COURT OF NIGERIA
IN THE ABUJA JUDICIAL DIVISION
HOLDEN AT ABUJA

SUIT NO: FHC/ABJ/CS/2391/2025

FEDERAL HIGH COURT
ABUJA
CASHIER

BETWEEN:

1. JONAHCAPITAL NIGERIA LIMITED
2. HOUSES FOR AFRICA NIGERIA LIMITED

} **PLAINTIFFS/ APPLICANTS**

AND

1. CORPORATE AFFAIRS COMMISSION
2. ADENIRAN OLATOKUNBO OGUNMUYIWA

} **DEFENDANTS/ RESPONDENTS**

MOTION ON NOTICE

SECTIONS 6(6)(B) AND 36 OF THE CONSTITUTION OF THE FEDERAL REPUBLIC OF NIGERIA, 1999 (AS AMENDED), ORDER 26 RULES 1 AND 2 OF THE FEDERAL HIGH COURT (CIVIL PROCEDURE) RULES 2019 AND UNDER THE INHERENT JURISDICTION OF THIS HONOURABLE COURT

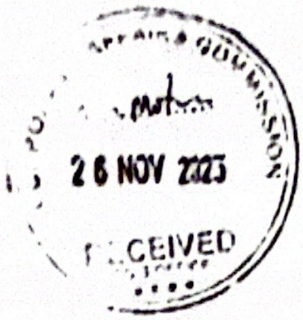
TAKE NOTICE that the Honourable Court will be moved on the _____day of_____, 2025, at the hour of 9 O'clock in the forenoon or so soon thereafter as Counsel may be heard on behalf of the Plaintiffs/Applicants praying the Honourable Court for the following reliefs:

1. **AN ORDER OF INTERLOCUTORY INJUNCTION** restraining the 1st Defendant, the Corporate Affairs Commission (CAC), from taking any step whatsoever to alter the current records or status of the Plaintiffs/Applicants' Companies domiciled with it or to change the Plaintiffs' share capital, alter the particulars of its current shareholders and directors or do anything that would undermine or that is capable of undermining, eroding and or diluting the Plaintiffs' shares capital and the interest of the current shareholders of the Plaintiffs' companies, pending the hearing and determination of the substantive Suit.

CamScanner

1st DEFENDANT

Name —
Designation —
Address —
Date / Time —
Signature / Stamp —

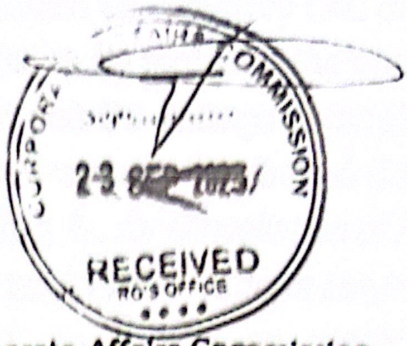


2nd DEFENDANT

Name —
Designation —
Address —
Date / Time —
Signature / Stamp.

S. I. AMEH (SAN) & CO.
Legal Practitioners, Notaries Public & Arbitrators

22nd September, 2025



The Registrar-General,
Corporate Affairs Commission,
Tigris Crescent, Maitama
Abuja, FCT.

Attention: **Salisu Abubakar**
Compliance Unit, Corporate Affairs Commission,

Sir,

RE: REQUEST FOR CANCELLATION OF FRUADULENT FILINGS IN JONAHCAPITAL NIG. LTD. RC 669754; AND HOUSES FOR AFRICA NIGERIA LIMITED PURSUANT TO THE FORESIC REPORT.

We act as Solicitors to **JONAHCAPITAL NIG. LTD. AND HOUSES FOR AFRICA NIGERIA LIMITED** (hereinafter referred to as "Our Clients") on whose behalf and instructions we write.

Your letter dated 20th August 2025 but received by our clients on the 22nd day of September 2025 in respect of the above subject matter, refers.

May we start by observing that the letter our clients received did not have any petition attached to it as stated in the said letter. The documents attached to the letter are two purported unilaterally and surreptitiously obtained forensic reports. Our clients have also not had the benefit of reading the contents of the said petition to enable them respond directly to issues raised therein. If our clients are availed a copy of the petition, our clients' reaction to issues raised in the petition would be forwarded to you for your necessary consideration.

We further have our clients' instruction to draw the Commission's attention to the fact that the two purported forensic reports attached to your letter under reference have been subjected to a thorough investigation/review by a Special Investigation Panel (SIP) set-up by the Inspector General of Police, to specifically investigate allegation of forgery and the purported forensic reports concerning the filed CAC documents under contention.

JUBILEE CHAMBERS
12 Dennis Osadebey Crescent, Zone A, Apo Legislative Quarters, Apo FCT, Box 5151, Garki, Abuja
Fax:09-2731164, Tel: 08161111602. E-mail: jubileelaw_office@yahoo.com; info@siamehsanandco.org

In carrying out their mandate, the SIP took the pain to interview and obtain the statements of the lawyers who presented all necessary CAC documents effecting the various changes now alleged to be forged to the Commission. It is instructive to bring to your attention that the findings of the SIP on the alleged forged CAC documents (which interestingly has formed the basis of the unholy request by the petitioners calling "*... for cancellation of fraudulent filings in Jonah Capital Nig Ltd; and Houses for Africa Nigeria Ltd pursuant to a forensic report*") is that there was no forgery as alleged by the Petitioners/Complainants. One is therefore at sea as to how and why the petitioners are still holding on to the said forensic reports that have been discredited by the SIP set-up by the IGP. This fact is verifiable from the office of the Honourable Attorney General of the Federation who has taken over the entire case file from the police.

Let us make haste to state for the record that in the course of the SIP investigation, they obtained statements from the Solicitors who presented for filing the documents at CAC and in their statements, they categorically stated that it was Adeniran Ogunmuyiwa and John Townley-Johnson were the ones that gave them those documents for filing. The making of the documents in the circumstance is strictly between the Solicitors (**L.D. Shwarkuka & Associates**), Adeniran Ogunmuyiwa and John Townley-Johnson. They must both swim and sink with those documents.

However, DCP Akin Fakorede, of the IGP Monitoring Unit single-handedly jettisoned what the ten-man SIP panel painstakingly investigated and hurriedly generated a second Investigation Report (without interviewing the lawyers who presented the allegedly forged documents for filing at CAC) which was released via a telecast on June 27, 2025. The said report shockingly indicted principal officers of our clients of forgery contrary to the findings of the SIP.

May we also inform the Commission that the Office of the Honourable Attorney General of the Federation has taken over the case file from the police in respect of the alleged forensic report, the SIP report, the DCP. Akin Fakorede's reviewed report, and has further instructed the Nigeria Police to

immediately stay any further action or investigation on the issue. Essentially, the office of the Chief Law Officer of the Federation is now in charge of the allegation of forgery to the notice of persons suspected to be the petitioners but have brazenly chosen in their typical manner to undermine constituted authority. **Attached as Annexure 1 is a copy of the said Letter.**

At this juncture, may we respectfully draw your attention to the fact that there is pending before the Federal High Court, Abuja Division coram: Egwuatu J. a Suit filed on the 6th day of March 2025, against the Corporate Affairs Commission (CAC) and our clients have applied to be joined as interested parties. The subject matter of the said suit is the same allegation of forgery of CAC documents in respect of JonahCapital Nigeria Ltd 669754 and Houses for Africa Nigeria Ltd RC 729760. The Particulars of the said Suit is ***Suit No.: FHC/ABJ/CS/16/2024 between 1. Dr. Adeniran Olatokunbo Ogunmuyiwa 2. Houses for African Holdings Inc. V. Corporate Affairs Commission.*** **Attached as Annexures 2 and 3 are copies of relevant processes in the Suit.**

The record of the Court clearly indicated that your Commission was duly served with the originating and subsequent processes in the suit but CAC is yet to take any step in defence of the Suit.

We respectfully state that the present petition on the allegation of forgery and the forwarding of forensic reports by DCP. Fakorede to the Commission is an attempt clearly targeted at prompting the Commission to take steps that may undermine the integrity of the Court before which the issue and subject matter of the Commission's current investigation is pending and scheduled for hearing on the 9th day of October 2025.

It is also an attempt to invite the Commission to prejudicially pre-empt the outcome of a matter that was filed by persons suspected to be the petitioners in requesting the Commission to take the place of a judex, make far reaching decision reserved only for the judex who is constitutionally *dominus* litis of Suit No.: FHC/ABJ/CS/16/2024 to cancel legitimately filed returns by our

clients **(JONAHCAPITAL NIG. LTD. RC 669754: AND HOUSES FOR AFRICA NIGERIA LIMITED).** The request of the petitioners and DCP Fakorede if acceded to will certainly put the Commission on a collision course with the Court.

It is also very worrisome and reprehensible to say the least that the persons suspected to be the petitioners instituted Suit No.: FHC/ABJ/CS/16/2024 but do not also have the courage to wait through the entire judicial process they have set in motion but have through the back door ran to the Commission to make far reaching decisions.

It is imperative to respectfully inform the Commission that in addition to the above referenced suit, the suspected petitioners and the police have charged some officers of our clients to court in Charge NO: CR/402/2025 on the same allegation of fraudulently altering company documents at the Commission. This Charge is pending at the High Court of the Federal Capital Territory Coram: Osho-Adebiyi J., and without waiting for the court to determine the issue of forgery alleged in the said Charge and or finding anybody guilty of forgery have gone to town screaming forged documents.

What is discernible to a wary mind is to what end would a party who has instituted a civil suit and orchestrated the filing of a criminal charge in respect of their allegation that certain company documents and returns at the Commission were fraudulently forged not await the outcome of the judicial processes they have set in motion. What are they afraid of?

Given the circumstances of this case as commented above, it would respectfully be the most prudent step by the Commission to forthwith stay action on any petition pending before it in respect of JonahCapital Nigeria Ltd 669754 and Houses for Africa Nigeria Ltd (HFANL) RC 729760 pending the outcome of the actions in court; as anything to the contrary would be pre-emptive of these cases and the outcome of the review of the Attorney General of the Federation.

FURTHER COMMENTS ON THE ALLEGATION OF FORGERY/FORENSIC REPORTS:

We make haste to state categorically that the allegation of forgery purportedly backed by some forensic reports is horrendously false. Little wonder they have no faith in their baseless court actions but have resorted to hoodwink the Commission into taking steps which will be injurious to our clients' interests.

At incorporation, JonahCapital Nigeria Ltd with RC No. 669754 (JCNL) had three (3) shareholders – Samuel Esson Jonah, KBE was the majority shareholder of JCNL with **400,000 Ordinary Shares**, (representing 40% equity shareholding in the company); Adeniran Ogunmuyiwa with **300,000 Ordinary Shares** (representing 30% equity) **and Olakitan Ogunmuyiwa** with **300,000 Ordinary Shares** (representing 30% equity). ***The incorporation documents of JonahCapital at the time of incorporation are attached as Annexure 4.***

It is our further brief that in 2007, **JonahCapital** invited a US based foreign investor (Houses for Africa Holdings Inc., USA, a Delaware Company) to invest in its operations. Consequently, Houses for Africa Nigeria Limited (HFANL) was incorporated on February 7, 2008 in accordance with extant Laws.

By virtue of a Shareholders Agreement executed in 2007, the first shareholders of JonahCapital Nigeria Ltd., being the trio of **Sir Samuel Esson Jonah** 40%, **Adeniran Ogunmuyiwa** 30%, and **Olakitan Ogunmuyiwa** 30%, all voluntarily relinquished their shares in JonahCapital Nigeria Limited in favour of Houses for Africa Nigeria Limited. By the above-mentioned Shareholders Agreement, 80% shares in Houses for Africa Nigeria Limited was allotted to **Houses for Africa Holdings Inc., USA**; while 20% shares were allotted to **Adeniran Ogunmuyiwa** in consideration for the relinquishment of his and **Olakitan Ogunmuyiwa's** shares in JCNL. *See* ***Annexure 5 for the Shareholders Agreement and the relinquishment of shares.***

Furthermore, by a further corporate restructuring, the Board of JCNL, resolved to re-allot 999,999 of its shares to Houses for Africa Nigeria Limited; while Adeniran Ogunmuyiwa continue to retain one (1) unit of shares in JCNL to meet up with the minimum legal requirement of at least 2 shareholders. Effectively, Houses for Africa Nigeria Limited became the majority shareholder of JonahCapital Nigeria Ltd. ***Attached as Annexure 6 are companies resolutions dated 25th and 26th of August 2009 respectively, Shareholders Agreement and relevant CAC documents.***

In 2012, **Adeniran Ogunmuyiwa** voluntarily relinquished his **2,000,000 Ordinary Shares** in HFANL in exchange for **94.8 Hectares** of land in River Park Estate vide an Agreement titled 'Heads of Agreement' dated 1st June 2012; a Board Resolution dated 4th June, 2012; and a letter dated 6th June, 2012. ***The Heads of Agreement, the Board Resolution dated 4th June, 2012, Concept Document dated May 25, 2012, all prepared by Adeniran (and an email originating from Adeniran detailing the terms of the Heads of Agreement) and the letter dated 6th June, 2012 are attached as Annexure 7.***

Let us state for the records that none of the parties alleging forgery have come out to deny that these emails did not emanate from them.

A circumspective review of the documents attached to our comments as annexures above, will clearly show beyond doubt that the parties we suspect are the petitioners were the same people who voluntarily resigned their appointments as directors at JCNL and HFANL; voluntarily relinquished their shares in JCNL and HFANL; sent supporting emails; briefed the law firm of **L.D. Shwarkuka & Associates** to present for filings CAC documents reflecting the corporate restructuring at the Commission.

For emphasis the resignations are as follows:

a. Olakitan Aramide Ogunmuyiwa from **JonahCapital Nigeria Ltd** dated **26th November 2009.**

b. Adeniran Ogunmuyiwa from **JonahCapital Nigeria Ltd and Houses for Africa Nigeria** on the **1st of July 2017.**

c. John Townley Johnson from **Houses for Africa Nigeria Limited dated 26th of November 2013** including email trails.

d. Paul Odili in **Houses for Africa Nigeria Limited dated 11th August, 2014.** ***Attached as Annexure 8 are various letters of resignation.***

It is noteworthy that the persons suspected to be the petitioners have not denied the fact that they resigned from these companies, sent supporting emails, prepared relevant CAC forms and more importantly briefed the Law Firm of **L.D. Shwarkuka & Associates** to effect the filings to evidence the changes at the Commission. The said Solicitors confirmed to the SIP and other public agencies that the duly signed corporate documents which they filed at the CAC (subject matter of this Petition) were duly signed by the duo of Adeniran Ogunmuyiwa and John Townley-Johnson and handed over to them for filing at the CAC.

The above stated fact is further verifiable at **paragraph 6 of the Completion Agreement which is attached as Annexure 9 for ease of reference.** The said paragraph 6 is hereunder reproduced:

"The following original documents have been seen by representatives of Jonah and are being held by the company secretaries of HFA Nigeria and JCN, for release to Jonah or action by the company secretaries as instructed by Jonah once the first payment has been made:

a. ***The signed documentation, comprising directors and shareholders resolutions and signed transfer forms necessary to carry out the transfer of the Sale shares to Jonah;***

b. ***The original corporate document of HFA Nigeria and JCN and all documents, including plans and approvals, relevant to the River Park and Kaba site;***

c. ***The signed resignation of Messrs. J Townley-Johnson and A. Ogun from the Board of HFA Nigeria and its subsidiaries;"***

It is noteworthy that this Completion Agreement was duly executed by one of the Complainants and suspected Petitioners, John Townley-Johnson and

none of the petitioners have denied this important document in all their petitions before the police. It is also interesting to note that Adeniran Ogunmuyiwa (one of the suspected Petitioners) categorically stated in his letter written in 2017 that he no longer has any interest in JCNL and HFANL, and also attached '***pre signed C02 and C07 forms***' to the letter. **Attached as annexures 10 is the said letter and emails** further confirming that the allegation of forgery is a mere ruse and smoke screen.

Our clients further briefed us that it has also come to their attention that there has been a lot of fuss regarding the increase in shares to N100Million and change in the nationality of officers of our clients. Their simple response is that the increase in shares to N100Million was done in compliance with the Commission's directive mandating companies with foreign investors/shareholders to shore up their share capital to N100Million minimum.

The officers of our clients never change their nationality at any time. When the filings were done at CAC, their nationalities were stated to be Ghanaians. For some inexplicable reasons, the status report of our clients as at January, 2025 changed their nationalities from Ghanaians to Nigerians. Upon noticing this error committed by the Commission, our clients applied for correction of the CAC records which was done by the Commission correcting the error in their nationalities from Nigerians to Ghanaians. **Attached as Annextures 11^{1-3} are the CAC documents filed 24th February, 2014, Status Report of the company as at January, 2025 and the status report generated on Thursday,15th May, 2025.**

Our clients had to increase their shares to N100 Million and paid the requisite fees payable by non-Nigerians. It therefore beats our clients imagination how it can be alleged that their officers indicated Nigeria as their nationality.

It is also instructive to note that our clients have duly paid their Annual Returns since 2013 to date and it is surprising that persons claiming ownership have not bothered to pay Annual Returns on the companies they

purport to own since 2013 to date. **Attached as Annextures 12[1-12] are the Acknowledgment of the payment of the Annual Returns.**

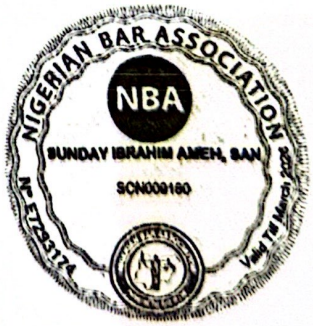
In conclusion, the allegation of forgery of corporate documents despite being manifestly false and mischievous, is the subject of the suit before the Federal High Court in Suit: FHC/ABJ/CS/16/2024 which for all intent and purposes is sub judice and the subject forensic reports the petitioners are urging the CAC to act upon and cancel the corporate documents duly filed is currently being reviewed by the office of the Attorney General of the Federation and makes the report and conclusion of the DCP. Akin Fakorede's report inchoate and premature to be acted upon.

Consequently, from the foregoing, we most respectfully urge the Commission not to accede to the request of DCP Akin Fakorede/the Police and the Petitioners under consideration as the said request are baseless, frivolous, forum shopping, gold digging and an attempt to undermine the integrity of the Courts and the office of the Attorney General of the Federation.

We are available to provide any further documentation or clarification as may be required.

Yours faithfully,

PP: S. I. Ameh (SAN) & Co.
(Solicitors)



S. I. Ameh, SAN, FCIArb., FICMC, OFR.
(Head of Practice)

CC:

1. **Director of ICT**
   Corporate Affairs Commission,
   Tigris Crescent, Maitama
   Abuja, FCT.

2. **Director of Compliance**
   Corporate Affairs Commission,
   Tigris Crescent, Maitama
   Abuja, FCT.