

Temp 33150/2017

IN THE HIGH COURT OF LAGOS STATE
IN THE IKEJA JUDICIAL DIVISION
HOLDEN AT IKEJA

CHARGE NO.....

FEDERAL REPUBLIC OF NIGERIA **COMPLAINANT**

V.

1. INNOSON NIGERIA LIMITED }
2. DR. INNOCENT CHUKWUMA } **DEFENDANTS**
3. CHARLES CHUKWUMA }

INFORMATION

DATED THIS 30TH DAY OF NOVEMBER 2017

At the Criminal Division of the High Court of Lagos State holden at Ikeja on the Day of 2017, the Court is informed by the Executive Chairman of Economic and Financial Crimes Commission on behalf of the Federal Republic of Nigeria that:

- 1. INNOSON NIGERIA LIMITED
- 2. DR. INNOCENT CHUKWUMA
- 3. CHARLES CHUKWUMA

are charged with the following Offences:

STATEMENT OF OFFENCE - 1ST COUNT

Conspiracy to obtain property by false pretence contrary to Sections 8(a) and 1(3) of the Advance Fee Fraud and Other Related Offences Act, No 14 of 2006.

PARTICULARS OF OFFENCE

Innoson Nigeria Limited, Dr. Innocent Chukwuma and Charles Chukwuma between 2009 and July 2011, in Lagos within the jurisdiction of this honourable Court, with intent to defraud, conspired amongst yourselves to obtain by false pretence, containers of motorcycles spare parts and raw

materials from Mitsui O.S.K Lines Limited, Apapa, Lagos, property of Guaranty Trust Bank Plc, Lagos.

STATEMENT OF OFFENCE - 2ND COUNT

Obtaining property by false pretence contrary to sections 1(1)(b) and 1(3) of the Advance Fee Fraud and Other Related Offences Act, No 14 of 2006.

PARTICULARS OF OFFENCE

Innoson Nigeria Limited, Dr. Innocent Chukwuma and Charles Chukwuma between 2009 and July 2011, in Lagos within the jurisdiction of this honourable Court, with intent to defraud, induced the staff of Mitsui O.S.K Lines Limited, Apapa, Lagos and Maersk Line Limited to deliver to you through your clearing agents, containers of motorcycle spare parts moulds of plastic parts and steel structures and raw materials called polyvinylchlorid, property of Guaranty Trust Bank Plc imported into Nigeria from China in the name of the said Bank as the consignee, by falsely pretending that you were authorized by the said Guaranty Trust Bank Plc to clear the goods and took delivery of same.

STATEMENT OF OFFENCE - 3RD COUNT

Stealing contrary to Sections 388 and 309(9) of the Criminal Code, Cap. C17 Vol. 11, Laws of Lagos State, 2003.

PARTICULARS OF OFFENCE

Innoson Nigeria Limited, Dr. Innocent Chukwuma and Charles Chukwuma sometime in 2009 and July 2011, at Apapa Port, Lagos within the jurisdiction of this honourable Court, fraudulently stole containers of motorcycle spare parts, moulds of plastic parts and steel structures and raw materials called polyvinylchloride, property of Guaranty Trust Bank Plc. being the consignee of the said goods.

STATEMENT OF OFFENCE 4th - COUNT

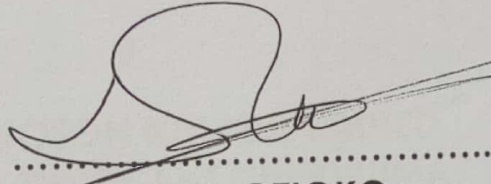
Forgery contrary to section 465 and 467(I)(J) of the Criminal Code, Cap. C17 Vol. Law of Lagos State, 2003.

PARTICULARS OF OFFENCE

Innoson Nigeria Limited, Dr. Innocent Chukwuma and Charles Chukwuma sometime in 2009 and July 2011, at Apapa Port, Lagos within the jurisdiction of this honourable Court, with intent to defraud and in order to facilitate your obtaining goods by false pretence, forged bill of lading No. 598286020 of Maersk Line Limited and No. Molu 11007950841 of Mitsui O.S.K. Lines Limited by knowingly putting a false Guaranty Trust Bank Plc stamp signature of its staff on the said bill of lading with intent that they might be

used or acted upon as genuine to the prejudice of any person whether within Lagos State or elsewhere.

DATED 30th THIS DAY NOVEMBER 2017



A.B.C. OZIOKO
HEAD OF LEGAL AND PROSECUTION, LAGOS
FOR: ECONOMIC AND FINANCIAL CRIMES COMMISSION



IN THE HIGH COURT OF LAGOS STATE
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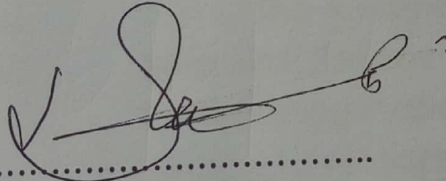
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PROOF OF EVIDENCE



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A.B.C. OZIOKO
HEAD OF LEGAL AND PROSECUTION, LAGOS
FOR: ECONOMIC AND FINANCIAL CRIMES COMMISSION



THE EXECUTIVE CHAIRMAN,
ECONOMIC AND FINANCIAL CRIMES COMMISSION
15A AWOLOWO ROAD,
IKOYI, LAGOS.

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LIST OF WITNESSES

INFORMATION

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| 1. Mr. Dabi Gideon Dahgod (Forensic Doc. Exam Officer) | 1.) Conspiracy to Obtain property by false pretences contrary to sections 8(a) and 1(3) of the Advance Fee Fraud and Other Related Offences Act, No. 14 of 2006. |
| 2. Rep.(s) of GT Banks. | |
| 3. Rep.(s) of Mitsui O.S. | |
| 4 Rep.(s) of Maersk Line Ltd, Lagos | 2.) Obtaining Property by False Pretence contrary to sections 1(1)(b) and 1(3) of Advance Fee Fraud and Other Related Offences Act, No. 14 of 2006 |
| 5. Adesola Amusan | |
| 6. Monday Deekor | |
| 7. .Shuaib Shehu | 3.)Stealing contrary to Sections 388 and 309 (9) of the Criminal Code, Cap C.17 Vol. 11, Laws of Lagos State, 2003 |
| 8. Sanusi Mohammed | |
| 9. Idowu Martins | |
| 10. Gideon Kura | 4) Forgery, contrary to sections 465 and 467 (I)(J) of Criminal Code, Cap C.17 Vol. 11, Laws of Lagos State, 2003 |