

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

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CHARGE NO:.....

FEDERAL REPUBLIC OF NIGERIA

LA/1711C/2015

v.

1. GOODIE MINABO IBRU
2. ASSOCIATED VENTURES INTERNATIONAL LIMITED
3. IHL SERVICES LIMITED
4. CLEARVIEW INVESTMENT LIMITED

INFORMATION

DATED THIS 13TH DAY OF July 2015

At the Criminal Division of the High Court of Lagos State holden at Lagos on theday of.....2015, the Court is informed by the Executive Chairman of Economic and Financial Crimes Commission on behalf of the Federal Republic of Nigeria that:

1. GOODIE MINABO IBRU
2. ASSOCIATED VENTURES INTERNATIONAL LIMITED
3. IHL SERVICES LIMITED
4. CLEARVIEW INVESTMENT LIMITED

are charged with the following offences:

STATEMENT OF OFFENCE - 1ST COUNT

Conspiracy to steal contrary to Section 516 of the Criminal Code Cap C.17, Vol.11, Laws of Lagos State of Nigeria, 2003.

PARTICULARS OF OFFENCE

Goodie Minabo Ibru, Associated Ventures International Limited, IHL Services Limited and Clearview Investment Limited between January and December, 2010 at Lagos within the Lagos Judicial Division conspired amongst yourselves to steal by fraudulently converting the sum of N867,700,990 (Eight hundred and sixty seven million, seven hundred thousand, nine hundred and ninety Naira) property of Ikeja Hotels Plc.

STATEMENT OF OFFENCE – 2nd COUNT

Stealing by fraudulent conversion contrary to Sections 370(7)(b) and 9 of the Criminal Code Cap. C.17, Vol.11, Laws of Lagos State of Nigeria, 2003.

PARTICULARS OF OFFENCE

Goodie Minabo Ibru, Associated Ventures International Limited, IHL Services Limited and Clearview Investment Limited between January and December 2010 at Lagos within the Lagos Judicial Division, with intent to defraud, fraudulently converted to your own personal use the sum of N867,700,990 (Eight hundred and sixty seven million, seven hundred thousand, nine hundred and ninety Naira) property of Ikeja Hotels Plc which sum of money you received through Starwood Limited (Managers of Sheraton Hotels, Ikeja) as profit due to Ikeja Hotels Plc.

STATEMENT OF OFFENCE – 3rd COUNT

Stealing by fraudulent conversion contrary to Sections 370(7)(b) and 9 of the Criminal Code Cap. C.17, Vol.11, Laws of Lagos State of Nigeria, 2003.

PARTICULARS OF OFFENCE

Goodie Minabo Ibru, Associated Ventures International Limited, IHL Services Limited and Clearview Investment Limited between June and October 2010 at Lagos within the Lagos Judicial Division, with intent to defraud, fraudulently converted to your own personal use the sum of N55,102,485.00 (Fifty five million, one hundred and two thousand, four hundred and eighty five Naira) property of Ikeja Hotels Plc which sum of money you received through Starwood Limited (Managers of Sheraton Hotels, Ikeja) as profit due to Ikeja Hotels Plc.

STATEMENT OF OFFENCE – 4th COUNT

Stealing by fraudulent conversion contrary to Sections 370(7)(b) and 9 of the Criminal Code Cap. C.17, Vol.11, Laws of Lagos State of Nigeria, 2003.

PARTICULARS OF OFFENCE

Goodie Minabo Ibru, Associated Ventures International Limited, IHL Services Limited and Clearview Investment Limited between May and October 2010 at Lagos within the Lagos Judicial Division, with intent to defraud, fraudulently converted to your own personal use the sum of £10,075 (Ten thousand and seventy five Pounds) property of Ikeja Hotels Plc which sum of money you received through

Starwood Limited (Managers of Sheraton Hotels, Ikeja) as profit due to Ikeja Hotels Plc.

STATEMENT OF OFFENCE – 5th COUNT

Stealing by fraudulent conversion contrary to Sections 370(7)(b) and 9 of the Criminal Code Cap. C.17, Vol.11, Laws of Lagos State of Nigeria, 2003.

PARTICULARS OF OFFENCE

Goodie Minabo Ibru, Associated Ventures International Limited, IHL Services Limited and Clearview Investment Limited between March and October 2010 at Lagos within the Lagos Judicial Division, with intent to defraud, fraudulently converted to your own personal use the sum of \$13,373 (Thirteen thousand three hundred and seventy three United States Dollars) property of Ikeja Hotels Plc which sum of money you received through Starwood Limited (Managers of Sheraton Hotels, Ikeja) as profit due to Ikeja Hotels Plc.

STATEMENT OF OFFENCE – 6th COUNT

Stealing by fraudulent conversion contrary to Sections 370(7)(b) and 9 of the Criminal Code Cap. C.17, Vol.11, Laws of Lagos State of Nigeria, 2003.

PARTICULARS OF OFFENCE

Goodie Minabo Ibru, Associated Ventures International Limited, IHL Services Limited and Clearview Investment Limited sometime in February 2011 at Lagos within the Lagos Judicial Division, with intent to defraud, fraudulently converted to your own personal use the sum of N27,508,766.25 (Twenty seven million, five hundred and eight thousand, seven hundred and sixty six Naira and twenty five Kobo) property of Ikeja Hotels Plc which sum of money you received through Clearview Investment Limited proceeds of the sale of Ikeja Hotels Property.

STATEMENT OF OFFENCE – 7th COUNT

Stealing by fraudulent conversion contrary to Sections 278(1)(b) and 285(8) and 9(b) of the Criminal Law of Lagos State of Nigeria, 2011.

PARTICULARS OF OFFENCE

Goodie Minabo Ibru, Associated Ventures International Limited, IHL Services Limited and Clearview Investment Limited between January and February, 2015 at Lagos within the Lagos Judicial Division, dishonestly converted to your own personal use the sum of N21,366,013.00 (Twenty one million, three hundred and sixty six thousand and thirteen Naira) property of Ikeja Hotels Plc which sum

of money you received through Starwood Limited (Managers of Sheraton Hotels, Ikeja) as profit due to Ikeja Hotels Plc.

STATEMENT OF OFFENCE – 8th COUNT

Stealing by fraudulent conversion contrary to Sections 278(1)(b) and 285(8) and 9(b) of the Criminal Law of Lagos State of Nigeria, 2011.

PARTICULARS OF OFFENCE

Goodie Minabo Ibru, Associated Ventures International Limited, IHL Services Limited and Clearview Investment Limited between April and October, 2011 at Lagos within the Lagos Judicial Division, dishonestly converted to your own personal use the sum of N120,550,661 (One hundred and twenty million, five hundred and fifty thousand, sixty six Naira) property of Ikeja Hotels Plc which sum of money you received through Starwood Limited (Managers of Sheraton Hotels, Ikeja) as profit due to Ikeja Hotels Plc.

STATEMENT OF OFFENCE – 9th COUNT

Stealing by fraudulent conversion contrary to Sections 370(7)(b) and 9(b) of the Criminal Code Cap C.17, Vol.11, Law of Lagos State of Nigeria, 2003.

PARTICULARS OF OFFENCE

Goodie Minabo Ibru, Associated Ventures International Limited, IHL Services Limited and Clearview Investment Limited on or about 17th day of February, 2011 at Lagos within the Lagos Judicial Division, with intent to defraud, fraudulently converted to your own personal use the sum of €2,400 (Two thousand four hundred Euros) property of Ikeja Hotels Plc which sum of money you received through Starwood Limited (Managers of Sheraton Hotels, Ikeja) as profit due to Ikeja Hotels Plc.

STATEMENT OF OFFENCE – 10th COUNT

Stealing by fraudulent conversion contrary to Sections 278(1)(b) and 285(8) and 9(b) of the Criminal Law of Lagos State of Nigeria, 2011.

PARTICULARS OF OFFENCE

Goodie Minabo Ibru, Associated Ventures International Limited, IHL Services Limited and Clearview Investment Limited between February and December, 2011 at Lagos within the Lagos Judicial Division, dishonestly converted to your own personal use the sum of £50,609 (Fifty thousand six hundred and nine Pounds) property of Ikeja Hotels Plc which sum of money you received through Starwood Limited (Managers of Sheraton Hotels, Ikeja) as profit due to Ikeja Hotels Plc.

STATEMENT OF OFFENCE - 11th COUNT

Stealing by fraudulent conversion contrary to Sections 278(1)(b) and 285(8) and 9(b) of the Criminal Law of Lagos State of Nigeria, 2011.

PARTICULARS OF OFFENCE

Goodie Minabo Ibru, Associated Ventures International Limited, IHL Services Limited and Clearview Investment Limited between May and October, 2011 at Lagos within the Lagos Judicial Division, dishonestly converted to your own personal use the sum of \$20,603 (Twenty thousand six hundred and three United States Dollars) property of Ikeja Hotels Plc which sum of money you received through Starwood Limited (Managers of Sheraton Hotels, Ikeja) as profit due to Ikeja Hotels Plc.

Dated this 13th day of July 2015

**ABC OZIOKO ESQ.
FOR: EXECUTIVE CHAIRMAN
ECONOMIC AND FINANCIAL CRIMES COMMISSION**



[Handwritten signature and date]
17/7/15

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HOLDEN AT LAGOS

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PROOF OF EVIDENCE

ABC Ozioko
ABC OZIOKO ESQ.
FOR: EXECUTIVE CHAIRMAN
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:

1. Orji Okechukwu
2. S. Bala
3. Ahmed Ghali
4. Mr. Kadiri
5. Danladi Yatah
6. Goog Isaac
7. Kanu Idagu
8. Toke Alex Ibru
9. Olawale Makinde
10. Oyinda Akinyemi
11. Lucky Odogun
12. Olutosin Odejimi
13. Olawale Makinde
14. Representative(s) of
Oma Investment Limited
And Omamo Investment
Corporation
15. Representative(s) of
Diamond Bank Plc
16. Representative(s) of Zenith Bank Plc
17. Representative(s) of Ikeja Hotels Plc
18. Representative(s) of Starwood Limited

INFORMATION

1. Conspiracy to steal contrary to Section 516 of the Criminal Code Cap C.17, Vol.11, Laws of Lagos State of Nigeria, 2003.
2. Stealing by fraudulent conversion contrary to Sections 370(7)(b) and 9 of the Criminal Code Cap. C.17, Vol.11, Laws of Lagos State of Nigeria, 2003.
3. Stealing by fraudulent conversion contrary to Sections 278(1)(b) and 285(8) and 9(b) of the Criminal Law of Lagos State of Nigeria, 2011.