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REPLY TO

ABUJA C. SAN
LAGOS C. SAN

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 **INDEMNITY**
PARTNERS
Legal Practitioners, Notaries Public

20 September 2024

The Inspector General of Police,
Nigeria Police Force
Force Headquarters,
Louis Edet House,
Abuja, FCT.

Dear Sir,

PETITION OF FRAUD, CRIMINAL BREACH OF TRUST, CRIMINAL CONSPIRACY, OBTAINING THE TOTAL SUMS OF THREE BILLION ONE HUNDRED AND SEVENTY MILLION THREE HUNDRED THOUSAND AND FORTY NAIRA (₦3,170,300,040), AND ONE BILLION SEVEN HUNDRED AND EIGHTY-FOUR MILLION SIXTY THOUSAND NAIRA (₦1,784,060,000) FROM MR. CHINEDU NGWAKA AND MR. UCHENNA EJINDU RESPECTIVELY BY FALSE PRETENSE AND ISSUANCE OF DUD CHEQUES AND FAKE TELEXES AGAINST MRS. TITILAYO OLUFUNMILAYO EBOH AND HER HUSBAND MR. LIVINUS EBOH.

We are Solicitors to Mr. Chinedu Ngwaka and Mr. Uchenna Ejindu hereinafter referred to as "our Clients" on whose express instructions and authority we write to formally bring to your attention a case of Criminal breach of trust, criminal conspiracy and obtaining money by false pretense involving one Mrs. Titilayo Olufunmilayo Eboh and her husband Mr. Livinus Eboh, who deceitfully obtained substantial sums of money from our clients, one of which is a licensed Bureau De Change (BDC) operator.

Details of the Incident:

False Representation: Mrs. Titilayo Olufunmilayo Eboh presented herself to our Clients that she has access to dollars directly from the Central Bank of Nigeria (CBN) through her NGO – Blessed Hope Foundation. Relying on this false representation, our clients agreed to transact with her.



IN CHAMBERS:

B. C. Igwilo, SAN (Partner), Chuks Nwachuku, LL.M. (Partner), O. A. Nwachuku, (Mrs), LL.M., N.B. Adlukwu LL.B, Chldinma Osaji, LL.B, K.B. Ajayi, (Mrs), LL.B, Tochi Uzokwe, LL.B, Obinna S. Nwosu LL.B, Mary-Ann Ekwe, LL.M, T. G. Okechukwu, LL.B, Chika Maduneme LL.B,