

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

IN THE MATTER FOR THE ENFORCEMENT OF THE APPLICANT'S
FUNDAMENTAL HUMAN RIGHT.

FHC/ABJ/CS/10/2025
SUIT NO.....

BETWEEN:

ERNEST CHUKUEMEKA OKPAGA ESQ..... APPLICANT

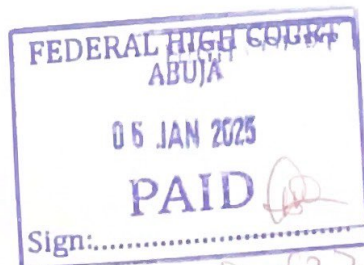
AND

- | | | |
|--|---|-------------|
| <ol style="list-style-type: none">1. ATTORNEY GENERAL OF THE FEDERATION2. POLICE SERVICE COMMISSION3. MINISTER OF POLICE AFFAIRS4. NIGERIA POLICE FORCE5. INSPECTOR GENERAL OF POLICE6. CP UCHE IFEANYI HENRY (THE DIRECTOR
NIGERIA POLICE FORCE NATIONAL
CYBER CRIME CENTRE ABUJA)7. CSP OMAKA UDODINMA CHUKWU8. SUPOL RALIAT IMAM | } | RESPONDENTS |
|--|---|-------------|

ORIGINATING MOTION

Brought Pursuant To Sections 34 and 35 Of The Constitution Of The Federal Republic Of
Nigeria 1999 (as amended), Order 2 Rule (1) Enforcement Of Fundamental Rights
Rules, 2009, Articles 3, 4, 5, 6 And 7 Of African Charter On Human And People's
Right (Ratification And Enforcement) Act Laws Of The Federal Republic Of Nigeria.

TAKE NOTICE that this Honourable court shall be moved onday
of.....2024 at the hour of 9 o'clock in the forenoon or so soon thereafter as Counsel
for the Applicant may be heard praying this Honorable Court for the following orders:-



A DECLARATION of this Honourable Court that the arrest, detention, intimidation and harassment of the Applicant on the 19th day of December, 2024 by the officers of the 4th and the 5th Respondents led by the 7th and 8th Respondents and others who are officers in the office of the 6th Respondent in the cause of representing his client and without committing any offence is against the provisions of the Constitution of the Federal Republic of Nigeria, 1999 as amended and is not justified by any law and amounts to a violation of the Applicant's Fundamental Rights to dignity of his person, Personal Liberty, Freedom of Movement, and the Applicant is therefore entitled to damages.

A DECLARATION of this Honourable Court that the assault and molestation of the Applicant by the Officers of the 4th and the 5th Respondents led by the 7th and 8th Respondents and others who are officers in the office of the 6th Respondent on the 19th day of December, 2024 is a gross violation of the Applicant's Fundamental Rights to respect to the dignity of his person, is illegal and unconstitutional and the Applicant is therefore entitled to damages.

3. **AN ORDER** of this Honourable Court declaring the 6th, 7th and 8th Respondents unfit to hold any public office or employment in Nigeria and directing the 2nd Respondent to dismiss the 6th, 7th and 8th Respondents from the service of the 5th Defendant.

4. **AN ORDER** of this Honourable Court directing the Respondents to jointly and severally pay the sum of **₦500,000,000.00 (Five Hundred Million Naira Only)** damages to the Applicant for his unlawful arrest, detention, assault, molestation and causing of psychological trauma and inconveniences.

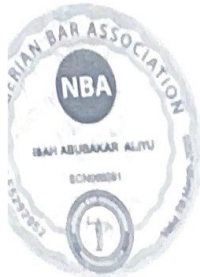
5. **AN ORDER** of this Honourable Court directing the Respondents to jointly and severally tender a written unreserved apology to the Applicant in two National Newspapers with widespread readership.

6. **AN ORDER OF PERPETUAL** injunction restraining the Respondents either by themselves, their servants, agents, privies or whosoever and howsoever from making further attempt to harass, intimidate, assault, molest, arrest or detain the Applicant.

7. General Damages of **₦100,000,000.00 (One Million Naira Only)** jointly and severally against the Respondents.

ANY OTHER ORDER (s) as this Honorable Court may deem fit to make in the interest of justice.

DATED THIS 23rd DAY OF December 2024



[Handwritten signature]

AMA ETUWEWE, SAN
EKO EJEMBI EKO, SAN
IBRAHIM ALIYU NASSARAWA, ESQ.
NIRI DARONG, ESQ.
✓ I.A. ALIYU, ESQ.
DR. S. M. OYEGHE, ESQ.
CHRISTIAN WANCHE, ESQ.
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