CHARGE NO FHELMEN CON 297/15

BETWEEN

FEDERAL REPUBLIC OF NIGERIA

) COMPLAINANT

AND

- 1. STEPHEN ORONSAYE
- 2. OSARENKHOE AFE
- 3. FREDRICK HAMILTON
 GLOBAL SERVICES LIMITED

ACCUSED PERSONS

CHARGE

FEDERAL HIGH COURT

ABUJA

CAISHIER

Signature...

COUNT 1

That you STEPHEN ORONSAYE, ABDULRASHEED ABDULLAHI MAINA (now at large) OSARENKHOE AFE and FREDRICK HAMILTON GLOBAL SERVICES LIMITEDon or about 2nd July, 2010 in Abuja, within the jurisdiction of this Honourable Court collaborated in disguising genuine nature of the sum of N161, 472, 000 (One Hundred and Sixty-One Million, Four Hundred and Seventy Two Thousand Naira) derived from an illegal act to wit; conducting procurement fraud by means of fraudulent and corrupt acton the contract extension of biometric enrolment purportedly awarded to Innovative Solutions Limited by the Office of the Head of Service of the Federation without following due process and you thereby committed an offence punishable under Section 14 (1) (b) of the Money Laundering (Prohibition) Act, 2004.

COUNT 2

That you STEPHEN ORONSAYE, ABDULRASHEED ABDULLAHI MAINA (now at large) OSARENKHOE AFE and FREDRICK HAMILTON

GLOBAL SERVICES LIMITED between June and July, 2010 in Abuja, within the jurisdiction of this Honourable Court collaborated in disguising genuine nature of the sum of N63, 375, 000 (Sixty-Three Million, Three Hundred and Seventy-Five Thousand Naira) derived from an illegal act to wit; conducting procurement fraud by means of fraudulent and corrupt acton the contract of biometric enrolment purportedly awarded to Innovative Solutions Limited by the Office of the Head of Service of the Federation without following due process and you thereby committed an offence punishable under Section 14 (1) (b) of the Money Laundering (Prohibition) Act, 2004.

COUNT 3

That you STEPHEN ORONSAYE, ABDULRASHEED ABDULLAHI MAINA (now at large) OSARENKHOE AFE and FREDRICK HAMILTON GLOBAL SERVICES LIMITED on or about 2nd July, 2010 in Abuja, within the jurisdiction of this Honourable Court collaborated in disguising genuine nature of the sum of N119, 398, 500 (One Hundred and Nineteen Million, Three Hundred and Ninety-Eight Thousand, Five Hundred Naira) derived from an illegal act to wit; conducting procurement fraud by means of fraudulent and corrupt acton the contract of biometric enrolment purportedly awarded to Fredrick Hamilton Global Services Limited by the Office of the Head of Service of the Federation without following due process and you thereby committed an offence punishable under Section 14 (1) (b) of the Money Laundering (Prohibition) Act, 2004.

COUNT 4

That you STEPHEN ORONSAYE, ABDULRASHEED ABDULLAHI MAINA (now at large) and XANGEE TECHNOLOGIES LIMITED (now facing another charge) between July and December, 2011 in Abuja, within the jurisdiction of this Honourable Court, collaborated in disguising genuine nature of the sum of N153, 146, 719.99 (One Hundred and Fifty-Three Million, One Hundred and Forty-Six Thousand, Seven Hundred and Nineteen Naira, Ninety-Nine kobo) derived from an illegal act to wit; conducting procurement fraud by means of fraudulent and corrupt actor the contract of biometric enrolment purportedly awarded to Xangee

of the Head of Service of the Federation without following due process and you thereby committed an offence punishable under Section 14 (1) (b) of the Money Laundering (Prohibition) Act, 2004

COUNT 13

That you STEPHEN ORONSAYE and ABDULRASHEED ABDULLAHI MAINA (now at large) between June, 2010 and July, 2010, in Abuja, within the jurisdiction of this Honourable Court, by false pretence and with intent to defraud, induced the delivery of an aggregate sum of N161, 472, 000 (One Hundred and Sixty-One Million, Four Hundred and Seventy Two Thousand Naira), from the Federal Government of Nigeria to one Innovative Solution Project Ltd. purporting same to be several contract sums for biometric data capture project which you know to be illegal and you thereby committed an offence contrary to Section 1(1) of the Advance Fee Fraud and Other Fraud Related Offences Act, 2006 and punishable under Section 1 (3) of the Advance Fee Fraud and Other Fraud Related Offences Act, 2006.

COUNT 14

That you STEPHEN ORONSAYE and ABDULRASHEED ABDULLAHI MAINA (now at large) on or about 7th July, 2010, in Abuja, within the jurisdiction of this Honourable Court, by false pretence and with intent to defraud, induced the delivery of the sum of N119, 398, 500 (One Hundred and Nineteen Million, Three Hundred and Ninety-Eight Thousand, Five Hundred Naira) from the Federal Government of Nigeria to one Frederick Hamilton Global Services Ltd. purporting same to be contract sums for biometric data capture project which you know to be illegal and you thereby committed an offence contrary to Section 1(1) of the Advance Fee Fraud and Other Fraud Related Offences Act, 2006 and punishable under Section 1 (3) of the Advance Fee Fraud and Other Fraud Related Offences Act, 2006.

COUNT 15

That you STEPHEN ORONSAYE and ABDULRASHEED ABDULLAHI MAINA (now at large) between August, 2010 and December, 2010, in

Technologies Limited by the Office of the Head of Service of the Federation without following due process and you thereby committed an offence punishable under Section 14 (1) (b) of the Money Laundering (Prohibition) Act, 2004.

COUNT 5

That you STEPHEN ORONSAYE and ABDULRASHEED ABDULLAHI MAINA (now at large) on or about 2nd November, 2010 in Abuja, within the jurisdiction of this Honourable Court, collaborated in disguising genuine nature of the sum of N7, 650, 000 (Seven Million, Six Hundred and Fifty Thousand Naira) derived from an illegal act to wit; conducting procurement fraud by means of fraudulent and corrupt acton the contract of biometric enrolment purportedly awarded to Fatideck Ventures by the Office of the Head of Service of the Federation without following due process and you thereby committed an offence punishable under Section 14 (1) (b) of the Money Laundering (Prohibition) Act, 2004.

COUNT 6

MAINA (now at large) on or about 23rd August, 2010 in Abuja, within the jurisdiction of this Honourable Court, collaborated in disguising genuine nature of an aggregate sum of N14, 000, 000 (Fourteen Million Naira) derived from an illegal act to wit; conducting procurement fraud by means of fraudulent and corrupt acton the contract of biometric enrolment purportedly awarded to Fatideck Ventures by the Office of the Head of Service of the Federation without following due process and you thereby committed an offence punishable under Section 14 (1) (b) of the Money Laundering (Prohibition) Act, 2004.

COUNT 7

That you STEPHEN ORONSAYE and ABDULRASHEED ABDULLAHI MAINA (now at large) on or about 23rd August, 2010 in Abuja, within the jurisdiction of this Honourable Court, collaborated in disguising genuine nature of an aggregate sum of N62, 525, 400 (Sixty-Two Million, Five Hundred and Twenty Five Thousand, Four Hundred Naira) derived from

an illegal act to wit; conducting procurement fraud by means of fraudulent and corrupt acton the contract of biometric enrolment purportedly awarded to Obalando Nigeria Enterprises by the Office of the Head of Service of the Federation without following due process and you thereby committed an offence punishable under Section 14 (1) (b) of the Money Laundering (Prohibition) Act, 2004.

COUNT 8

That you STEPHEN ORONSAYE and ABDULRASHEED ABDULLAHI MAINA (now at large) on or about 2nd November, 2010 in Abuja, within the jurisdiction of this Honourable Court, collaborated in disguising genuine nature of an aggregate sum of N34, 240, 000 (Thirty Four Million, Two Hundred and Forty Thousand Naira) derived from an illegal act to wit; conducting procurement fraud by means of fraudulent and corrupt acton the contract of biometric enrolment purportedly awarded to Obalando Nigeria Enterprises by the Office of the Head of Service of the Federation without following due process and you thereby committed an offence punishable under Section 14 (1) (b) of the Money Laundering (Prohibition) Act, 2004.

COUNT 9

That you STEPHEN ORONSAYE and ABDULRASHEED ABDULLAHI MAINA (now at large) between April and May, 2010 in Abuja, within the jurisdiction of this Honourable Court, collaborated in disguising genuine nature of an aggregate sum of N131, 038, 425 (One Hundred and Thirty One Million, Thirty-Eight Thousand, Four Hundred and Twenty Five Naira) derived from an illegal act to wit; conducting procurement fraud by means of fraudulent and corrupt acton the contract of biometric enrolment purportedly awarded to Moshfad Enterprises by the Office of the Head of Service of the Federation without following due process and you thereby committed an offence punishable under Section 14 (1) (b) of the Money Laundering (Prohibition) Act, 2004.

COUNT 10

That you STEPHEN ORONSAYE and ABDULRASHEED ABDULLAHI MAINA (now at large) between March and December, 2010 in Abuja, within the jurisdiction of this Honourable Court, collaborated in disguising genuine nature of an aggregate sum of N37, 113, 088 (Thirty-Seven Million, One Hundred and Thirteen Thousand, Eighty-eight Naira) derived from an illegal act to wit; conducting procurement fraud by means of fraudulent and corrupt acton the contract of biometric enrolment purportedly awarded to Fesbee Global Resources Limited by the Office of the Head of Service of the Federation without following due process and you thereby committed an offence punishable under Section 14 (1) (b) of the Money Laundering (Prohibition) Act, 2004.

COUNT 11

That you STEPHEN ORONSAYE and ABDULRASHEED ABDULLAHI MAINA (now at large) on or about 23rd August, 2010 in Abuja, within the jurisdiction of this Honourable Court, collaborated in disguising genuine nature of an aggregate sum of N20, 198, 400 (Twenty Million, One Hundred and Ninety-Eight Thousand, Four Hundred Naira) derived from an illegal act to wit; conducting procurement fraud by means of fraudulent and corrupt acton the contract of biometric enrolment purportedly awarded to Jolance Integrated Concept Limited by the Office of the Head of Service of the Federation without following due process and you thereby committed an offence punishable under Section 14 (1) (b) of the Money Laundering (Prohibition) Act, 2004.

COUNT 12

That you STEPHEN ORONSAYE between March and May, 2010 in Abuja, within the jurisdiction of this Honourable Court, collaborated in disguising genuine nature of an aggregate sum of N79, 681, 130 (Seventy-Nine Million, Six Hundred and Eighty-One Thousand, One Hundred and Thirty Naira) derived from an illegal act to wit; conducting procurement fraud by means of fraudulent and corrupt acton the contract of biometric enrolment purportedly awarded to M.O.F Investment Limited by the Office

Abuja, in Abuja, within the jurisdiction of this Honourable Court, by false pretence and with intent to defraud, induced the delivery of an aggregate sum of N153, 146, 719.99 (One Hundred and Fifty-Three Million, One Hundred and Forty-Six Thousand, Seven Hundred and Nineteen Naira, Ninety-Nine kobo) from the Federal Government of Nigeria to one Xangee Technologies Ltd. purporting same to be several contract sums for biometric data capture project which you know to be illegal and you thereby committed an offence contrary to Section 1(1) of the Advance Fee Fraud and Other Fraud Related Offences Act, 2006 and punishable under Section 1 (3) of the Advance Fee Fraud and Other Fraud Related Offences Act, 2006.

COUNT 16

That you STEPHEN ORONSAYE and ABDULRASHEED ABDULLAHI MAINA (now at large) on or about 2nd November, 2010, in Abuja, within the jurisdiction of this Honourable Court, by false pretence and with intent to defraud, induced the delivery of an aggregate sum of N7,650,000.00 (Seven Million, Six Hundred and Fifty Thousand Naira) from the Federal Government of Nigeria to one Fatidek Ventures, purporting same to be contract sum for biometric data capture project which you know to be illegal and you thereby committed an offence contrary to Section 1(1) of the Advance Fee Fraud and Other Fraud Related Offences Act, 2006 and punishable under Section 1 (3) of the Advance Fee Fraud and Other Fraud Related Offences Act, 2006.

COUNT 17

That you STEPHEN ORONSAYE within the jurisdiction of this Honourable Court, while serving as the Head of Service of the Federal Government of Nigeria on or about 2nd November, 2010, by false pretence and with intent to defraud, induced the delivery of an aggregate sum of N34,240,000.00 (Thirty-Four Million, Two Hundred and Forty Thousand Naira) from the Federal Government of Nigeria to one Obalando Nigeria Enterprises. with the Diamond Bank Plc Account purporting same to be contract sum for biometric data capture project which you know to be illegal and you thereby committed an offence contrary to Section 1(1) of the Advance Fee Fraud and Other Fraud Related Offences Act, 2006 and punishable under Section 1 (3) of the Advance Fee Fraud and Other Fraud Related Offences Act, 2006.

COUNT 18

That you STEPHEN ORONSAYE, between April andMay, 2010,in Abuja, within the jurisdiction of this Honourable Court, by false pretence and with intent to defraud, induced the delivery of an aggregate sum of N131, 038, 425.00 (One Hundred and Thirty-One Million, Thirty-Eight Thousand, Four Hundred and Twenty-Five Naira) from the Federal Government of Nigeria to one Moshfad Enterprises. Account purporting same to be several contract sums for Computer Accessories & biometric data capture project which you know to be illegal and you thereby committed an offence contrary to Section 1(1) of the Advance Fee Fraud and Other Fraud Related Offences Act, 2006 and punishable under Section 1 (3) of the Advance Fee Fraud and Other Fraud Related Offences Act, 2006.

COUNT 19

That you STEPHEN ORONSAYE, between March, 2010 and December, 2010, in Abuja, within the jurisdiction of this Honourable Court, by false pretence and with intent to defraud, induced the delivery of an aggregate sum of N97, 113,088.00(Ninety Seven Million, One Hundred and Thirty Thousand, Eighty-Eight Naira) from the Federal Government of Nigeria to one Fesbee Global Resources Ltd. purporting same to be several contract sums for biometric data capture project which you know to be illegal and you thereby committed an offence contrary to Section 1(1) of the Advance Fee Fraud and Other Fraud Related Offences Act, 2006 and punishable under Section 1 (3) of the Advance Fee Fraud and Other Fraud Related Offences Act, 2006.

COUNT 20

That you STEPHEN ORONSAYE and ABDULRASHEED ABDULLAHI MAINA (now at large) between March, 2010 and May, 2010, in Abuja, within the jurisdiction of this Honourable Court, by false pretence and with intent to defraud, induced the delivery of an aggregate sum of N79,681,130.00(Seventy-Nine Million, Six Hundred and Eighty-One Thousand, One Hundred and Thirty Naira) from the Federal Government of Nigeria to one M.O.F Investment Ltd. purporting same to be several contract sums for Computer Accessories which you know to be illegal and

you thereby committed an offence contrary to Section 1(1) of the Advance Fee Fraud and Other Fraud Related Offences Act, 2006 and punishable under Section 1 (3) of the Advance Fee Fraud and Other Fraud Related Offences Act, 2006.

COUNT 21

That you STEPHEN ORONSAYE, between 15th March, 2010 and 16th March, 2010, in Abuja, within the jurisdiction of this Honourable Court, by false pretence and with intent to defraud, induced the delivery of an aggregate sum of N66, 847, 000.00 (Sixty-Six Million, Eight Hundred and Forty-Seven Thousand Naira) from the Federal Government of Nigeria to one M.O.F. Investment Ltd. purporting same to be several contract sums for Computer Accessories which you know to be illegal and you thereby committed an offence contrary to Section 1(1) of the Advance Fee Fraud and Other Fraud Related Offences Act, 2006 and punishable under Section 1 (3) of the Advance Fee Fraud and Other Fraud Related Offences Act, 2006.

COUNT 22

March, 2010, in Abuja, within the jurisdiction of this Honburable Court, by false pretence and with intent to defraud, induced the delivery of an aggregate sum of N28, 490, 550.00 (Twenty-Eight Million, Four Hundred and Ninety Thousand, Five Hundred and Fifty Naira) from the Federal Government of Nigeria to one Innovative Solution Project Ltd. purporting same to be several contract sums for biometric data capture project which you know to be illegal and you thereby committed an offence contrary to Section 1(1) of the Advance Fee Fraud and Other Fraud Related Offences Act, 2006 and punishable under Section 1 (3) of the Advance Fee Fraud and Other Fraud Related Offences Act, 2006.

COUNT 23

That you OSARENKHOE AFE and FREDRICK HAMILTON GLOBAL SERVICES LIMITED on or about 2nd July, 2010 in Abuja, within the jurisdiction of this Honourable Court, by false pretence and with intent to defraud, obtained an aggregate sum of N119, 398, 500 (One Hundred and

Nineteen Thousand, Three Hundred Ninety-Eight Thousand, Five Hundred Naira), from the Federal Government of Nigeria purporting same to be several contract sums for biometric data capture project which you know to be illegal and you thereby committed an offence contrary to Section 1(1) of the Advance Fee Fraud and Other Fraud Related Offences Act, 2006 and punishable under Section 1 (3) of the Advance Fee Fraud and Other Fraud Related Offences Act, 2006

COUNT 24

That you STEPHEN ORONSAYE on or about 30th June, 2010 in Abuja, within the jurisdiction of this Honourable Court, transferred an aggregate sum N113, 638,980.70 (One Hundred and Thirteen Million, Six Hundred and Thirty-Eight Thousand, Nine Hundred and Eighty Naira, Seventy kobo) derived from an illegal act to wit; breach of trust by authorizing the movement of the said sum from the account of the Head of Service of the Federation with Union Bank to a Unity Bank Plc. Account belonging to Principal Private Secretary to the President of Nigeria (Contingency Account) and to which account (Unity Bank Plc. Account) you were the sole signatory and you thereby committed an offence punishable under Section 14 (1) (a) of the Money Laundering (Prohibition) Act, 2004

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Dated this	ί (Ο	day of	·/ 2015
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YUSUF ALIYU, IM

AG. DEPUTY DIRECTOR OF LEGAL,

LEGAL & PROSECUTION DEPARTMENT,

ECONOMIC AND FINANCIAL CRIMES COMMISSION

ABUJA.

CHARGE	NO:	 	

BETWEEN

FEDERAL REPUBLIC OF NIGERIA

) COMPLAINANT

AND

- 1. STEPHEN ORONSAYE
- 2. OSARENKHOE AFE
- 3. FREDRICK HAMILTON GLOBAL SERVICES LIMITED

ACCUSED PERSONS

AFFIDAVIT IN SUPPORT OF CHARGE

- I, MOHAMMED GOJI, Male, Nigerian Citizen of 5, Formella Street, Off Adetokunbo Ademola Crescent, Wuse Zone II, Abuja do make oath and state as follows:
 - 1. That I am an Operative with Economic and Financial Crimes Commission (the Commission).
 - 2. That I am a member of the investigative team assigned by the Commission to investigate the complaints against the Accused Persons herein and by virtue of my position, I am familiar with the facts of this case.
 - 3. That I have the consent and authority of the Chairman of the Economic and Financial Crimes Commission to depose to this Affidavit.
 - 4. That the facts deposed to hereunder are those derived by me in the course of performing my official duties.
 - 5. That investigation into this case has been concluded.
 - 6. That I am of the opinion that a prima facie case has been made out against the accused persons herein

- 7. That the prosecution is ready to immediately commence trial
- 8. That the prosecution witnesses are ready and willing to come to court.
- 9. That I depose to this Affidavit in good faith and believing same to be true and correct in accordance with the Oaths Act, Laws of the Federation of Nigeria 2004.

DEPONENT

SWORN to at the Federal High Court Registry, Abuja.

BEFORE ME OATES

COMMISSIONER FOR OATHS

CHARGE NO:...

BETWEEN

FEDERAL REPUBLIC OF NIGERIA

) COMPLAINANT

AND

- 1. STEPHEN ORONSAYE
- 2. OSARENKWE AFE
- 3. FREDRICK HAMILTON GLOBAL SERVICES LIMITED

ACCUSED PERSONS

LIST OF WITNESSES

- 1. PDS ALIYU HABIBU.
- 2. SDS GOJI MOHAMMED.
- 3. SDS SULAIMAN NURUDEEN.
- 4. SDS YUSUF MUSTAPHA.
- 5. SDS SALIU KADIRI.
- DDS ROUQAYYA IBRAHIM.
- 7. ADS SIMON IORZUA.
- 8. ADS ATTEB GODWIN.

INVESTIGATING OFFICERS
TO GIVE EVIDENCE OF
THEIR INVESTIGATION
AND TENDER NECESSARY
DOCUMENTS.

- CHARLES BONAT
- 10. KARAMOT LAWAL
- 11. ROBERT IKAZOBOH
- 12. GARBA YUSUF
- 13. SALAMI KAREEM ADESOKAN
- 14. KELANI TAJUDEEN
- 15. GANIYU OWOLABI RASAKI
- 16. JOAN JOLAADE ADEPONLE
- 17. REPRESENTATIVE OF FIDELITY BANK
- 18. REPRESENTATIVE OF DIAMOND BANK

- 19. REPRESENTATIVE OF ZENITH BANK
- 20. REPRESENTATIVE OF ACCESS BANK
- 21. REPRESENTATIVE OF UNION BANK
- 22. REPRESENTATIVE OF UNITY BANK

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Dated this	$\{O^{\dagger}\}$	day of	2015
		adj di	

YUSUF ALIYU, M

AG. DEPUTY DIRECTOR OF LEGAL,

LEGAL & PROSECUTION DEPARTMENT,

ECONOMIC AND FINANCIAL CRIMES COMMISSION

ABUJA.

CHARGE	NO:	 						•							
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BETWEEN

FEDERAL REPUBLIC OF NIGERIA

) COMPLAINANT

AND

- 1. STEPHEN ORONSAYE
- 2. OSARENKWE AFE
- 3. FREDRICK HAMILTON GLOBAL SERVICES LIMITED

ACCUSED PERSONS

PROOF OF EVIDENCE

Dated this day of DULY 2015

YUSUF ALIYU, [™]
AG. DEPUTY DIRECTOR OF LEGAL,
LEGAL & PROSECUTION DEPARTMENT,
ECONOMIC AND FINANCIAL CRIMES COMMISSION
ABUJA.

CHARGE NO:....

BETWEEN

FEDERAL REPUBLIC OF NIGERIA

) COMPLAINANT

AND

- 1. STEPHEN ORONSAYE
- 2. OSARENKWE AFE
- 3. FREDRICK HAMILTON GLOBAL SERVICES LIMITED

ACCUSED PERSONS

LIST OF WITNESSES

- 1. PDS ALIYU HABIBU.
- 2. SDS GOJI MOHAMMED.
- 3. SDS SULAIMAN NURUDEEN.
- 4. SDS YUSUF MUSTAPHA.
- 5. SDS SALIU KADIRI.
- 6. DDS ROUQAYYA IBRAHIM.
- 7. ADS SIMON IORZUA.
- 8. ADS ATTEB GODWIN.

INVESTIGATING OFFICERS TO GIVE EVIDENCE OF THEIR INVESTIGATION AND TENDER NECESSARY DOCUMENTS.

- 9. CHARLES BONAT
- 10. KARAMOT LAWAL
- 11. ROBERT IKAZOBOH
- 12. GARBA YUSUF
- 13. SALAMI KAREEM ADESOKAN
- 14. KELAN TAJUDEEN
- 15. GANIYU OWOLABI RASAKI
- 16. JOAN JOLAADE ADEPONLE
- 17. REPRESENTATIVE OF FIDELITY BANK
- 18. REPRESENTATIVE OF DIAMOND BANK

- 19. REPRESENTATIVE OF ZENITH BANK
- 20. REPRESENTATIVE OF ACCESS BANK
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Dated this	-		dovest	\mathcal{M}'	〜 /	2045
Dated till	5		. uay or	(بهست		2010

YUSUF ALIYU, M.

AG. DEPUTY DIRECTOR OF LEGAL,
LEGAL & PROSECUTION DEPARTMENT,
ECONOMIC AND FINANCIAL CRIMES COMMISSION
ABUJA.