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

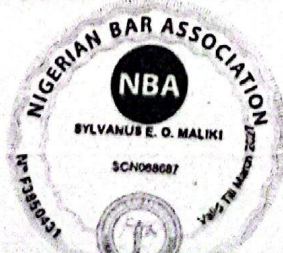
FHC/ABJ/CS/1432/2026
SUIT NO:

IN THE MATTER OF AN APPLICATION BY EGBOGU-ONYEKA DORIS OGOCHUKWU AND DORIGOLD ENTERPRISES LIMITED, FOR AN ORDER FOR THE ENFORCEMENT OF THEIR FUNDAMENTAL RIGHTS TO DIGNITY OF HUMAN PERSON, PERSONAL LIBERTY, PRIVATE AND FAMILY LIFE, FREEDOM OF EXPRESSION, RIGHT TO FAIR HEARING, MOVEMENT AND ASSOCIATION AS GUARANTEED BY SECTIONS 34, 35, 36, 37, 39, 41 AND 46(1) OF THE CONSTITUTION OF THE FEDERAL REPUBLIC OF NIGERIA, 1999, AS ALTERED, AND ARTICLES 5, 6, 8, 9, 10, 12 & 14 OF THE AFRICAN CHARTER ON HUMAN AND PEOPLES' RIGHTS (RATIFICATION AND ENFORCEMENT) ACT CAP A9 LAWS OF THE FEDERATION OF NIGERIA 2004 AND UNDER THE INHERENT JURISDICTION OF THIS HONOURABLE COURT.

BROUGHT PURSUANT TO:

- 1. SECTIONS 34 (1), 35 (1), (4) & (6), 36 (1), 37, 39, 41 (1) AND 46 (1) OF THE 1999 CONSTITUTION OF THE FEDERAL REPUBLIC OF NIGERIA, AS ALTERED;**
- 2. SECTIONS 1 (1), (2), 30 (1), (2), 31 (1), 32 (1), (2), (3), 159 & 314 (1) OF THE ADMINISTRATION OF CRIMINAL JUSTICE ACT, 2015;**
- 3. ARTICLES 2, 3 (1), (2), 5, 6, 7 (1) (a), (b), (d), 12 (1), 14, OF THE AFRICAN CHARTER ON HUMAN AND PEOPLES' RIGHTS (RATIFICATION AND ENFORCEMENT) ACT, CAP A9 LAWS OF THE FEDERATION OF NIGERIA 2004;**
- 4. ORDER 2, RULES 1, 2, 3, 4 AND 5 OF THE FUNDAMENTAL RIGHTS (ENFORCEMENT PROCEDURE) RULES 2009;**

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5. **AND UNDER THE INHERENT JURISDICTION OF THIS HONOURABLE COURT AS PRESERVED BY SECTION 6(6A) OF THE 1999 CONSTITUTION OF THE FEDERAL REPUBLIC OF NIGERIA, AS ALTERED.**

BETWEEN

1. **EGBOGU-ONYEKA DORIS OGOCHUKWU**
2. **DORIGOLD ENTERPRISES LIMITED.....APPLICANTS**

AND

1. **INSPECTOR GENERAL OF POLICE**
 2. **DEPUTY INSPECTOR GENERAL OF POLICE, FORCE CRIMINAL INVESTIGATION DEPARTMENT (FCID)**
 3. **NIGERIAN POLICE FORCE**
 4. **POLICE SERVICE COMMISSION**
 5. **MRS. ESTHER NKAMA ANIMASHAUN (TRADING UNDER THE NAME AND STYLE OF ELSH LUXURY DESIGN**
 6. **MISS OBIAGELI NKAMA**
- RESPONDENTS**

**NOTICE OF APPLICATION
FOR AN ORDER ENFORCING FUNDAMENTAL RIGHTS PURSUANT TO
ORDER 2 RULES (1), (2), (3), (4) AND (5) OF THE FUNDAMENTAL
RIGHTS (ENFORCEMENT PROCEDURE) RULES, 2009 AND
UNDER THE INHERENT JURISDICTION OF THIS
HONOURABLE COURT.**

TAKE NOTICE that this Honourable Court will be moved on the day of 2026, at 9 0'clock in the forenoon or so soon thereafter as counsel to the Applicants shall be heard praying this Honourable Court for the following reliefs:

1. **A DECLARATION** that the serial acts of intimidation, incessant invitations and persistent threats of the 1st to 4th Respondents to invite, witch-hunt, **EGBOGU-ONYEKA DORIS & 1 VS IGP & 5 ORS FUNDAMENTAL RIGHTS APPLICATION.** Page 2 of 55

arrest, detain, embarrass and humiliate the Applicants herein, on the prompting and instigation of the 5th and 6th Respondents, amount to a violation of the Applicants' fundamental rights as enshrined in *sections 34, 35, 36, 37, 39, and 41 of the Constitution of the Federal Republic of Nigeria, 1999, as altered, and Articles 5, 6, 8, 9, 10, 12 & 14 of the African Charter on Human and Peoples' Rights (Ratification and Enforcement) Act, Cap A9, Laws of the Federation of Nigeria, 2004.*

2. **A DECLARATION** that the serial acts of intimidation, incessant invitations and persistent threats of the 1st to 4th Respondents to invite, witch-hunt, *arrest*, detain, embarrass and humiliate the Applicants herein except for the purpose of invitation and or arrest to bring the Applicants before a court of competent jurisdiction in accordance with *section 35(1) (c) and (5) (a) and (b)* of the Constitution of the Federal Republic of Nigeria 1999 as altered, on the prompting and instigation of the 5th and 6th Respondents, over a civil relationship between the Applicants and the 5th and 6th Respondents is illegal, unlawful, wrongful, unconstitutional and constitute a blatant violation of the Applicants fundamental rights as enshrined in *sections 35, 37, 39, and 41 of the 1999 Constitution of the Federal Republic of Nigeria; as altered, and Articles 5, 6, 8, 9, 10, 12 & 14 of the African Charter on Human and Peoples' Rights (Ratification and Enforcement) Act Cap A9 Laws of the Federation of Nigeria 2004.*

3. **A DECLARATION** that the violent invasion, *viet armis* of the Applicants' residence at *House D38B, Alwadood Ali Lassa Boulevard Kuchiyako Annex, Kuje, Federal Capital Territory, Abuja*, by operatives of the 1st to 4th Respondents, at the instigation of the 5th and 6th Respondents, on the 20th day of June 2026 around 8:50am to harass and arrest the 1st Applicant, and the subsequent packing away of the Applicants' properties without a warrant or a court order to that effect, is ultra vires the powers of the 1st to 4th Respondents, is illegal, unconstitutional and constitutes a violation of the Applicants' fundamental rights to privacy and dignity of human person as guaranteed by *sections 34 and 37 of the Constitution of the Federal Republic of Nigeria 1999 (as altered) and Articles 3, 4 and 5 of the African Charter on Human and Peoples' Rights (Ratification and Enforcement) Act Cap A9, LFN 2004.*

4. **A DECLARATION** that the Applicants are entitled to a public apology and adequate compensation from the Respondents as provided for in *sections 35 (6) and 46 (1) of the 1999 Constitution of the Federal Republic of Nigeria, as altered, Sections 314 (1) and 323 (1), (2) of the Administration of Criminal Justice Act, 2015*, for the blatant violation of the Applicants' fundamental rights, over a civil relationship.
5. **AN ORDER** directing the Respondents jointly and severally, to pay to the Applicants the sum of *N20,000, 000, 000.00 (Twenty Billion Naira)* only as exemplary damages for the wanton and grave violation of the Applicants' fundamental rights, without following the due process of the law.
6. **AN ORDER** directing the *1st* and *4th* Respondents to return to the Applicants all the properties carted away on the *20th* day of June 2026 around *8:50am* from the *1st* Applicant' Apartment *viet armis* at *House D38B, Alwadood Ali Lassa Boulevard Kuchiyako Annex, Kuje, Federal Capital Territory, Abuja*, by operatives of the *1st* to *4th* Respondents, at the instigation of the *5th* and *6th* Respondents as itemized in paragraph *ap-(a) to (j)* of the Affidavit in support of this application.
7. **AN ORDER OF THIS HONOURABLE COURT** directing the Respondents to tender a public apology in at least, three national dailies, to the Applicants for the blatant violation of the Applicants' fundamental rights without following the due process of law.
8. **AN ORDER OF PERPETUAL** injunction, restraining the Respondents, their agents, servants, privies or howsoever called, from furthering the serial acts of intimidation, incessant invitations and persistent threats of the *1st* to *4th* Respondents to invite, **WITCH-HUNT**, arrest, detain, embarrass and humiliate the Applicants herein, on the prompting and instigation of the *5th* and *6th* Respondents with respect to anything connected to this subject matter, or anything related thereto, except for the purpose of bringing the Applicants before a court of competent Jurisdiction in accordance with *section 35(1) (c)* and *(5) (a) and (b)* of the Constitution of the Federal Republic of Nigeria 1999 as altered.

9. **AND FOR SUCH FURTHER OR OTHER ORDERS** as this Honorable Court may deem fit to make in the circumstances of this application.

AND TAKE FURTHER NOTICE that at the hearing of this Application, the said Applicants shall rely on the affidavit in support of this application.

DATED THIS DAY OF, 2026.

.....
REGISTRAR



✓ **OKUEYELEGBE S.E MALIKI ESQ.**
APPLICANTS' COUNSEL,
SYLVANUS E.O.B MALIKI & CO,
(OXYGEN CHAMBERS),
SUITES 8 & 9, HOUSE 2,
2ND FLOOR (ALSO KNOWN AS LAST FLOOR),
TRINITY TOWER, PLOT 943,
CADASTRAL ZONE B06,
(BEHIND MINISTRY OF WORKS),
MABUSHI, FEDERAL CAPITAL TERRITORY,
ABUJA.
MALICKSS@YAHOO.COM
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08094465054

FOR SERVICE ON:

THE 1ST RESPONDENT,
THE INSPECTOR GENERAL OF POLICE,

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**NIGERIA POLICE FORCE,
FORCE HEAD QUARTERS,
LOUIS EDET HOUSE,
FEDERAL CAPITAL TERRITORY,
ABUJA.**

**2ND RESPONDENT,
DEPUTY INSPECTOR GENERAL OF POLICE,
FORCE CRIMINAL INVESTIGATION DEPARTMENT,
(FCID),
SHEH U SHAGARI WAY,
AREA 10, GARKI,
FEDERAL CAPITAL TERRITORY,
ABUJA.**

**THE 3RD RESPONDENT,
NIGERIAN POLICE FORCE
FORCE HEAD QUARTERS,
LOUIS EDET HOUSE,
FEDERAL CAPITAL TERRITORY,
ABUJA.**

**4TH RESPONDENT,
POLICE SERVICE COMMISSION,
PLOT 64, CADASTAL ZONE B16,
SECTOR CENTRE B, JABI,
FEDERAL CAPITAL TERRITORY,
ABUJA.**

**5TH RESPONDENT,
MRS. ESTHER NKAMA ANIMASHAUN,
NO.1, ABSI ESTATE, EL RUFAl, KUJE,
FEDERAL CAPITAL TERRITORY,
ABUJA.**

**6TH RESPONDENT,
MISS OBIAGELI NKAMA,**

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**NO.1, ABSI ESTATE, EL RUFAI, KUJE,
FEDERAL CAPITAL TERRITORY,
ABUJA.**

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