

THE EXECUTIVE GOVERNOR  
OF LAGOS STATE,  
GOVERNOR'S OFFICE,  
LAGOS STATE SECRETARIAT,  
ALAUUSA, IKEJA, LAGOS.

ATTENTION: **HIS EXCELLENCY – GOV. AKINWUNMI AMBODE**

Your Excellency,

**RE: DEMOLITION OF 16 RESIDENTIAL BUILDINGS (COMPLETED AND UNCOMPLETED) AT LAGOON VIEW ESTATE, BY AKINSON BUS STOP, ALONG IBESHE ROAD, IKORODU, LAGOS STATE ALLEGEDLY BY THE OFFICERS OF LAGOS STATE GOVERNMENT**

**DEMAND FOR INTERVENTION, INVESTIGATION/ENQUIRY TO DETERMINE THOSE RESPONSIBLE AS WELL AS REDRESS TO RIGHT THE WRONG AND FORESTALL FUTURE OCCURRENCE**

We are Solicitors to 16 affected properties owners at Lagoon View Estate, along Ibeshe Road, by Akinson Bus Stop, Ikorodu, Lagos State represented by (1) **MR. VICTOR ARMSTRONG** (2) **MR. SEGUN SOLARIN** (3) **MRS. GRACE DIAI** (4) **MR. OLADIPUPO ALABI** and (5) **MRS. ADEJOKE ALABI** (“our Clients”) on whose instruction we now petition your good offices for succour in respect of the above captioned.

It is our brief that our Clients are properties owners (with some completed and inhabited while others are at various levels of development works) at the above Estate. Further that the land of the Estate to the best of the knowledge of our Clients is not subject to litigation or liable to Judgment execution.

Notwithstanding the foregoing, on Wednesday the 16<sup>th</sup> day of August 2017 after majority of our Clients have left for their places of work and businesses, a team of men and officers of the Lagos State Government Ministry of Physical Planning and Urban Development stormed our Clients Estate of Ikorodu with *36 fully armed Mobile Policemen and about 50 members-strong Army of Thugs and Hoodlums* forcibly entered upon and took possession of the Estate land in a warlike manner to take position and carried out massive demolition of our Clients’ properties including the ones already inhabited as dwelling houses with possession of the properties purportedly taken or recovered without following the due process of the law.

The said men and officers of the said Ministry stormed the Estate in the following vehicles;

- i. 2 Rav4 Sport Utility Vehicles.
- ii. 6 Toyota Hiace Buses (3 private and 3 with the inscription “Lagos State Ministry of Physical Planning and Urban Development”).
- iii. 3 Excavators loaded on Long Trailers that conveyed them.
- iv. 2 “Black Maria” with the inscription “Lagos State Environmental Sanitation Task Force”.

All of the said vehicles were deliberately unmarked so as to conceal the Culprits identities in the course of carrying out the illegal demolition exercise in the name of Lagos State Government; whereas they were actually acting at the prompting and instigation of an individual who applied for, processed and financed the illegal demolition on the alleged ground that he has a Global Certificate of Occupancy which covers the entire Estate land and without any formal notice and or hearing our Clients or people in lawful occupation thereof.

Furthermore, the said properties owners are at various level of compliance with relevant State Laws; a few of them have obtained Certificates of Occupancy with Building Approvals, Certificates of Occupancy of some of them are under processing with full payment and publication already made, while the remainder have obtained Land Information with record copies of their Survey Plans lodged with the relevant department and agency of the government.

.../2

**JOSIAH CHAMBERS  
AKIN DUYILEMI & CO.,  
LEGAL PRACTITIONERS**

- 2 -

According to our Clients, physical possession of landed properties are imperative and germane in Lagos State for which reasons they have commenced development works at the site in order to establish possession with the clear intention to continue with the

processing of relevant approvals and certification in full compliance with relevant State Laws as law abiding citizens.

.../3

**JOSIAH CHAMBERS  
AKIN DUYILEMI & CO.,  
LEGAL PRACTITIONERS**

- 3 -

In the aftermath of the illegal exercise, the said men and officers of the said Ministry left 16 properties at various level of development as Rubbles; the Residents together with their belongings were stranded and remain in anguish and untold hardship (including one of them with a new born baby) thereby willfully wasting properties cumulatively worth over N500,000,000.00 (FIVE HUNDRED MILLION NAIRA) in a manner that clearly showed that caution was thrown to the winds, due process was not followed and the rule of law jettisoned.

The descriptions of the demolished properties are as follows:

1. 2 Nos. 5 Bedroom Flat all en suite on ground floor and first floor at roofing level with swimming pool on 2 plots of land, property of (i) Mr. Oladipupo Alabi and (ii) Mrs. Adejoke Alabi.
2. 3 plots of land fenced with gate belonging to Mr. Victor Armstrong.
3. 6 plots of land with 3 Rooms Office at foundation level which property Barrister Adebowale Kamoru acquired for Mr. Abdulganiu Salako.
4. 3 Bedroom Bungalow and 1 Mini Flat on half a plot of land completed and belonging to Mr. Ayinla Azeez Niyi.
5. 4 Bedroom Flat Bungalow belonging to Mr. Lucas Olatunji Gafar on a plot of land.
6. Storey building on half a plot of land with 3 Bedroom Flat on each floor belonging to Mr. Animashaun Akeem.
7. 2 Bedroom Bungalow with an Attic on a plot of land completed and inhabited belonging to Mr. Silva Ajalaye and Mrs. Nelly Ajalaye
8. 3 Bedroom Flat at foundation level and 3 Bedroom Flat at window level on one plot of land belonging to Mr. Segun Solarin.
9. 3 Bedroom Flat Bungalow fully completed and inhabited on half a plot of land belonging to (i) Mr. Abiodun Olaiya and (ii) Mrs. Adijat Olaiya.

**JOSIAH CHAMBERS  
AKIN DUYILEMI & CO.,  
LEGAL PRACTITIONERS**

- 4 -

10. 2 Bedroom Flat Bungalow at lintel level on a half plot of land with bags of cement abandoned by fleeing workers belonging to Mr. LateefOjebiyi
11. 3 Bedroom Bungalow completed, furnished and inhabited together with 5 Bedroom Duplex at roofing level on one and a half plots of land belonging to Mr. Chris Ojemeke.
12. 7 Bedrooms plus 3 Living Rooms Mansion 90% completed with Security House on one plot of land belonging to Prince AbayomiBalogun.
13. 3 Bedroom Flat Bungalow completed on one plot of land belonging to Mrs. AdesanyaAdejokeOluwafisayo.
14. 2 Nos. of 2 Bedroom Flats with 1 Bedroom Mini Flat at decking level on one plot of land belonging to Mr. SanniSikiruAdetoye.
15. Bungalow Building on 2½ plots of land already fenced with gate with 3 foundations at the rear, whose identity is yet to be ascertained.
16. 3 Bedroom Duplex and 2 Bedroom Penthouse together with 2 Nos. of 3 Bedroom Flatat the back belonging to Mrs. Grace Dai.

We attach herewith a pictorial evidence of the massive destruction of standard structures that can only be carried out by very mean persons of inestimable wickedness.

As our Clients feel very strongly that even as citizens of this country; they can receive the foregoing treatment from men and officers of Lagos State Government in a democratic society with political office holders voted into power by them at the helm of affairs. The said action is contrary to Section 43 of the 1999 Constitution (as Amended) which clearly provided for their rights to acquire and own immovable property anywhere in Nigeria.

According to our Clients, those involved are tools in the hands of a Land Speculator who merely hid under the umbrella of the State Ministry in order to grab land belonging to another in view of the existence of the Lagos State Properties Protection Law 2016, the Lagos State Special Taskforce and Land Grabbers Tribunal.

**JOSIAH CHAMBERS  
AKIN DUYILEMI & CO.,  
LEGAL PRACTITIONERS**

- 5 -

It is our humble view that an Order of a Court of competent jurisdiction after full hearing afforded all parties concerned ought to have been obtained before such action could be taken because it is dangerous to allow the said trend to continue as it portends a reign of terror, lawlessness, as well as a return to Stone age for any public officer to be allowed to wield such enormous power of destruction without notice and hearing of persons whose interests are affected.

Therefore, we hereby pray as Solicitors on behalf of our Clients for a full blown investigation and or inquiry to be carried out with respect to the incident under consideration and with a view to unmasking those behind it, take remedial steps to redress the injustice as well as ensuring that no such incident ever repeats itself in this age and time of our development.

We have assured our Clients that the Lagos State Government we know has listening ears as well as stand for justice to be done to the oppressed for which reasons we now humbly urge your Excellency Sir, to urgently wade into the foregoing matter with a view to bringing succour to the affected persons.

We extend to you Sir, the courtesies that your Excellency's office deserve.

We remain.

Yours faithfully,

**AKIN DUYILEMI ESQ.**

ENC.

AD/RPO/LSCO/P/01/2017

AUGUST 22, 2017

THE LAGOS STATE COMMISSIONER OF POLICE  
LAGOS STATE POLICE COMMAND HEADQUARTERS,  
OBA AKINJOBI WAY  
BESIDE OLD SECRETARIAT  
IKEJA, LAGOS.

Dear Sir,

**RE: FORCIBLE ENTRY/POSSESSION, WILFUL DAMAGE TO PROPERTIES,  
REIGN OF TERROR AND LAWLESSNESS AND COMPLAINT  
AGAINST MISUSE OF MOBILE POLICEMEN BY THE OFFICERS OF  
LAGOS STATE MINISTRY OF PHYSICAL PLANNING AND URBAN  
DEVELOPMENT CONTRARY TO SECTIONS 52, 53, 56, 337, 348 AND 349  
OF THE CRIMINAL LAW OF LAGOS STATE AND THE POLICE ACT**

### **A SAVE OUR SOUL PETITION**

We are Solicitors to the Residents and Property Owners of Lagoon View Estate, along Ibeshe Road, by Akinson Bus Stop, Ikorodu, Lagos State represented by their CDA Chairman and Secretary respectively – Messrs Dickson Okechukwu and TaiwoOmojokun (“our Clients”) on whose instruction we now petition your good offices for succour in respect of the above captioned.

It is our brief that our Clients are properties owners with some completed and inhabited while others are at various level of development. Further that to the best of their knowledge and belief, their Estate land is not subject to any land litigation or liable to judgment execution.

Notwithstanding the foregoing, on Wednesday the 16<sup>th</sup> day of August, 2017 after majority of our Clients have left for their places of work and businesses, a team of men and officers of the Lagos State Government Ministry of Physical Planning and Urban Development stormed our Clients Estate at Ikorodu with 36 fully armed Mobile Policemen and about 50 members - strong *Army of Thugs and Hoodlums* forcibly entered upon and took possession of the Estate land for the benefit of a faceless

.../2

person who claimed that he has global Certificate of Occupancy in respect of the entire estate land without any notice or hearing of the affected persons.

The team together with their Policemen and army of thugs and hoodlums proceeded to take position in a warlike manner and wilfully damaged by way of massive demolition of our Clients properties together with the ones already inhabited as dwelling houses with possession of the properties taken and or recovered without the due process of the law.

The said men and officers of your said Ministry were at the Estate with the following vehicles;

- i. 2 Rav4 Sport Utility Vehicles.
- ii. 6 Toyota Hiace Buses (3 private and 3 with the inscription "Lagos State Ministry of Physical Planning and Urban Development").
- iii. 3 Excavators loaded on Long Trailers that conveyed them.
- iv. 2 "Black Maria" with the inscription "Lagos State Environmental Sanitation Task Force".

All of the said vehicles were deliberately unmarked so as to conceal the Culprits identities in the course of carrying out the illegal demolition exercise in the name of Lagos State Government; whereas they were actually acting at the prompting and instigation of an individual who applied for, processed and financed the illegal demolition on the alleged ground that he has a Global Certificate of Occupancy which covers the entire Estate land and without any formal notice to and or hearing our Clients or people in lawful occupation thereof.

In the aftermath of the illegal exercise, the said men and officers of the said Ministry left 16 properties at various level of development as Rubbles; the Residents together with their belongings were stranded and remain in anguish and untold hardship (including one of them with a

new born baby) thereby willfully wasting properties cumulatively worth over N500,000,000.00 (FIVE HUNDRED MILLION NAIRA) in a manner that clearly showed that caution was thrown to the winds, due process was not followed and the rule of law jettisoned.

The descriptions of the demolished properties are as follows:

1. 2 Nos. 5 Bedroom Flat all en suite on ground floor and first floor at roofing level with swimming pool on 2 plots of land, property of (i) Mr. OladipupoAlabi and (ii) Mrs. AdejokeAlabi.
2. 3 plots of land fenced with gate belonging to Mr. Victor Armstrong.
3. 6 plots of land with 3 Rooms Office at foundation level which property Barrister AdebowaleKamoru acquired for Mr. Abdulganiu Salako.
4. 3 Bedroom Bungalow and 1 Mini Flat on half a plot of land completed and belonging to Mr. AyinlaAzeezNiyi.
5. 4 Bedroom Flat Bungalow belonging to Mr. Lucas OlatunjiGafar on a plot of land.
6. Storey building on half a plot of land with 3 Bedroom Flat on each floor belonging to Mr. Animashaun Akeem.
7. 2 Bedroom Bungalow with an Attic on a plot of land completed and inhabited belonging to Mr. Silva Ajalaye and Mrs. Nelly Ajalaye
8. 3 Bedroom Flat at foundation level and 3 Bedroom Flat at window level on one plot of land belonging to Mr. SegunSolarin.
9. 3 Bedroom Flat Bungalow fully completed and inhabited on half a plot of land belonging to (i) Mr. AbiodunOlaiya and (ii) Mrs. AdijatOlaiya.



10. 2 Bedroom Flat Bungalow at lintel level on a half plot of land with bags of cement abandoned by fleeing workers belonging to Mr. LateefOjebiyi

.../4

**JOSIAH CHAMBERS  
AKIN DUYILEMI & CO.,  
LEGAL PRACTITIONERS**

- 4 -

11. 3 Bedroom Bungalow completed, furnished and inhabited together with 5 Bedroom Duplex at roofing level on one and a half plots of land belonging to Mr. Chris Ojemeke.
12. 7 Bedrooms plus 3 Living Rooms Mansion 90% completed with Security House on one plot of land belonging to Prince AbayomiBalogun.
13. 3 Bedroom Flat Bungalow completed on one plot of land belonging to Mrs. AdesanyaAdejokeOluwafisayo.
14. 2 Nos. of 2 Bedroom Flats with 1 Bedroom Mini Flat at decking level on one plot of land belonging to Mr. SanniSikiruAdetoye.
15. Bungalow Building on 2½ plots of land already fenced with gate with 3 foundations at the rear, whose identity is yet to be ascertained.
16. 3 Bedroom Duplex and 2 Bedroom Penthouse together with 2 Nos. of 3 Bedroom Flat at the back belonging to Mrs. Grace Dai.

We attach herewith a pictorial evidence of the massive destruction of standard structures that can only be carried out by very mean persons of inestimable wickedness.

As our Clients feel very strongly that even as citizens of this country; they can receive the foregoing treatment from men and officers of Lagos State Government in a democratic society with the cover up provided by 36 fully armed Mobile Policemen who should ordinarily protect them as well as provide cover for them to get away with the heinous atrocities aforesaid.

According to our Clients, those involved are tools in the hands of a Land Speculator who merely hid under the umbrella of the State Ministry in order to grab land belonging to another in view of the existence of the

Lagos State Properties Protection Law 2016, the Lagos State Special Taskforce and Land Grabbers Tribunal.

It is our humble view that an Order of a Court of competent jurisdiction after full hearing afforded all parties concerned ought to have been

.../5

**JOSIAH CHAMBERS  
AKIN DUYILEMI & CO.,  
LEGAL PRACTITIONERS**

- 5 -

obtained before such action could be taken because it is dangerous to allow the said trend to continue as it portends a reign of terror and lawlessness as well as a return to Stone age for any public officer to be allowed to wield such enormous power of destruction without notice and hearing of persons whose interests are affected.

Our concern as Legal Practitioners is that such action save for the fact that our Clients have gone for work may lead to the breakdown of law and order in the society and return the Country to the state of anarchy.

It is for the foregoing reason that we have further instruction from our Clients to request that you intervene in the foregoing matter with a view to carrying out discrete investigation in respect of the same and ensuring that the culprits are brought to book.

We extend to you Sir, the courtesies that your esteemed office deserve.

We remain.

Yours faithfully,

**AKIN DUYILEMI ESQ.**

**JOSIAH CHAMBERS  
AKIN DUYILEMI & CO.,  
LEGAL PRACTITIONERS**

- 5 -

obtained before such action could be taken because it is dangerous to allow the said trend to continue as it portends a reign of terror and lawlessness as well as a return to Stone age for any public officer to be allowed to wield such enormous power of destruction without notice and hearing of persons whose interests are affected.

Our concern as Legal Practitioners is that such action save for the fact that our Clients have gone for work may lead to the breakdown of law and order in the society and return the Country to the state of anarchy.

It is for the foregoing reason that we have further instruction from our Clients to request that you intervene in the foregoing matter with a view to carrying out discrete investigation in respect of the same and ensuring that the culprits are brought to book.

We extend to you Sir, the courtesies that your esteemed office deserve.

We remain.

Yours faithfully,

**AKIN DUYILEMI ESQ.**

CC:

THE ATTORNEY GENERAL &  
COMMISSIONER FOR JUSTICE,  
ATTORNEY GENERAL'S CHAMBERS,  
LAGOS STATE MINISTRY OF JUSTICE,  
LAGOS STATE SECRETARIAT,  
ALAUUSA, IKEJA, LAGOS.

Dear Sir,

The above is for your information and necessary action.

Yours faithfully,

AKIN DUYILEMI ESQ.

ENC.