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NOTE:

All the charges are compiled from information obtained from:-

- ❖ *EFCC: Letters, Exhibit Records 2003 to 2013, Reports*
- ❖ *Accountant General of the Federation*
- ❖ *EFCC's Bankers*
- ❖ *CBN*
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Relevant documents are available to support all the charges.

1.00. MALLAM NUHU RIBADU

- 1.01. That you Mallam Nuhu Ribadu, during your tenure as EFCC executive chairman, between the year 2003-2007, recovered the sum of **₦989 Billion** as proceeds from financial crimes but declared only **₦142 Billion**, thereby concealing the recovery of the proceeds from financial crimes of **₦847 Billion**
- 1.02. That you Mallam Nuhu Ribadu, as the executive chairman of EFCC between 2003 and 2007, conspired with your Director of Operations, Mr. Ibrahim Lamorde, now executive chairman, to stash away recovered proceeds of financial crimes in several unofficial accounts operated by you between 2003-2007, which enabled you to divert the sum of over **₦142 Billion** in breach of EFCC Establishment Act, 2004 and Extant laws.
- 1.03. That you Mallam Nuhu Ribadu as the executive chairman of EFCC between 2003-2007, conspired with Unity Bank Plc to divert the proceeds from two bank cheques in September 2005 valued at **₦580,407,332.23** and **₦586,211,466.95**, totaling **₦1,166,618,799.18**, which you purportedly claimed to have transferred to CBN but which CBN did not reflect in the EFCC Recovery Account with it.
- 1.04. That you Mallam Nuhu Ribadu, as executive chairman of EFCC between 2003-2007, conspired with Mr. Ibrahim Lamorde, (then your Director of Operations but now the executive chairman), Spring Bank of Nigeria Plc now Mainstream Bank and Access Bank Plc, to divert the

sum of ~~₦779,155,004.62~~, being part of Tafa Balogun's forfeited funds in various accounts in Spring Bank, which should have been transferred as ~~₦3,037,255,521.60~~ from Spring Bank but Access Bank recorded a receipt of only ~~₦2,258,100,516.98~~.

1.05. That you Mallam Nuhu Ribadu, conspired with Mr. Ibrahim Lamorde and Diya Fatimilehin & Co (Estate Surveyors), to divert the sum of ~~₦875 Million~~ vide GT Bank cheque No. 10608377 of 29/1/2007, being part of the proceeds from the disposal of assets forfeited by Tafa Balogun in 2006.

1.06. That you Mallam Nuhu Ribadu, conspired with Mr. Ibrahim Lamorde and Unity Bank Plc, ^{on or} about September, 2005, to divert the proceeds of three (3) Bond Bank drafts Nos. 00032632, 00032633 and 00032634 valued at ~~₦1,169,050,000.00~~.

1.07. That you Mallam Nuhu Ribadu, at sometime in 2004, diverted the sum of ~~₦31,800,000.00~~ being bribe money you claimed was offered to you by Emmanuel Ofulue, Bar. Obum Ogakwe and Amaka Anajemba on the Emmanuel Nwude's case. The said amount is not traceable to any Recovery Account operated by EFCC during your tenure.

1.08. That you Mallam Nuhu Ribadu, conspired with Mr. Ibrahim Lamorde, Diya Fatimilehin & Co (Estate Surveyors), to understate and conceal the actual number of real estate properties seized from Tafa Balogun in 2006 and the number sold, having seized 20 real estate properties but declared only 10 properties; having sold 18 properties but

declared that you sold only nine (9) and by so doing concealed and diverted over **₦2.0 Billion** that should have been remitted to the Consolidated Revenue Fund (CRF) since 2006.

1.09. That you Mallam Nuhu Ribadu, as the executive chairman of EFCC between 2003 and 2007, conspired with Mr. Ibrahim Lamorde and other headships of EFCC investigation units to cause some seized/recovered funds from criminal activities to be transferred to your office to the tune of **₦395 Million**, contrary to EFCC Establishment Act and other financial regulations which require you to transfer recovered funds to the Consolidated Revenue Fund (CRF) within 30 days.

1.10. That you Mallam Nuhu Ribadu, as the executive chairman of EFCC between 2003-2007, conspired with some persons indicted for financial crimes and some banks, to derive benefits from some monetary instruments in cheques and bank drafts and thereafter dumped in your exhibit rooms, the cheques and bank drafts valued at over **₦3.4 Billion** as stale and therefore worthless. This fact is contained in a report of an internal committee in EFCC set up by your successor, Mrs. Farida Waziri in 2009.

1.11. That you Mallam Nuhu Ribadu, conspired with some persons in Central Bank of Nigeria (CBN) to withdraw illegally the sum of over **₦814 Million** from an account which you know to be non-chequing and only transferable to the Consolidated Revenue Fund (CRF).

- 1.12. That you Mallam Nuhu Ribadu, as the executive chairman of EFCC claimed to have recovered the sum of **N55,000,000.00** in cash from Professor Fabian Osuji about March, 2005 and claimed to have lodged the said amount of **N55,000,000.00** into EFCC Recovery Account domiciled with Intercity Bank Plc, now Unity Bank Plc, on 3/4/2006. The said amount which you kept for more than one year (21/3/2005 to 3/4/2006) is not traceable to the said account as you may have diverted same.
- 1.13. That you Mallam Nuhu Ribadu, as executive chairman of EFCC, conspired with Mr. Ibrahim Lamorde, your Director of Operations then and now the EFCC Chairman and some other persons, to divert the sum of **N609,435,626.54**, being amount you claimed Sakaguchi (the victim in the much celebrated Emmanuel Nwude's case) paid to the Federal Government through EFCC and which Lamorde claimed was remitted to the FGN/CBN on 10/7/2008 i.e after more than 3 years and which is not traceable to such account in CBN.
- 1.14. That you Mallam Nuhu Ribadu, as executive chairman of EFCC, conspired with former CBN Governor, Professor Chukwuma Charles Soludo and Mr. Ibrahim Lamorde to divert the sum of over **N22 Billion** belonging to 13 companies owned by on Mr. Patrick S. Fernandez.
- 1.15. That you Mallam Nuhu Ribadu, as executive chairman of EFCC, conspired with some persons in the Nigerian Customs Service (NCS), under the guise of Presidential Task Force on Port Decongestion, in 2005, to divert the sum of **N44.522 Billion**, an amount that has not been duly accounted for up to date.

1.16. That you Mallam Nuhu Ribadu, as executive chairman of EFCC, sometime in April 2006, diverted the sum of **₦200,000,000.00** through the Executive Secretary of PTDF vide an account with Intercity Bank Plc now Unity Bank Plc.

1.17. That you Mallam Nuhu Ribadu, as executive chairman of EFCC, claimed to have recovered the sum of **₦8,183,969,961.72** from the sale of 733,264,280 units of Afribank Plc shares belonging to Delta State Government and released the said amount on 22nd May, 2007 to an unknown person.

1.18. That you Mallam Nuhu Ribadu, as executive chairman of EFCC, diverted the under listed recovered funds, totaling **₦2.676 Billion** by claiming that the funds were released to persons you could not identify as confirmed by your former director of operations, now the EFCC Chairman.

Page	Reference	Details	Date of Release	Amount Released (N)
15	199/2003	GTB cheque No. 0093117 dated 3/11/2003, STB cheque No. 00224320	4/11/2003	50,000,000.00
15	138/2003	3 GTB cheque No. 13285, 13289, 13291	5/11/2003	20,000,000.00
20	011/2004	Prudent bank draft No. 078232, Inland bank No. 00053514 Union bank No. 02087302	7/1/2004	42,274,856.00
28	167/2004	Prudent, Fidelity, GTB, International Trust bank, UBA, Inland cheques in favour of FGN	10/3/2004	39,118,642.00
34	348/2004	Bank of the North cheques Nos. 03478987, 10213836, 677637	24/05/2004	150,300,000.00
50	830/2004	Zenith bank cheque No. 0015, 0016	4/10/2004	150,000,000.00
54	910/2004	Fortune trust bank cheque No. 00010326 dated 30/11/2004	27/10/2004	120,000,000.00
56	970/2004	Afri Bank cheque No. 0366833 dated 8/1/2004, Nigerian Passport No. A1686268 for Henry	18/01/2008	60,000,000.00
58	1007/2004	FSB draft No. 00081829, 00081828, FSB booklet, photocopy of custom duty, photocopy of proof of ownership, complimentary card	22/11/2004	79,840,000.00
80	399/2005	Hall mark bank draft No. 00008990, Intercontinental bank draft No. 00007808, NAL bank draft No. 0000642, First Atlantic bank draft No. 0057979 dated 3/3/2005	7/4/2005	60,823,315.00
86	556/2005	Zenith bank cheque No. 00000002, No. 00000003	9/5/2005	90,000,000.00
89	633/2005	Zenith bank cheques	20/5/2005	615,381,620.00
103	1003/2005	NNb Bank draft No. 0013300 and Access bank draft No. 00014438	13/7/2005	155,000,000.00
125	1579/2005	Standard trust bank draft No. 01747674, Diamond bank draft No. 01765473 and Intercontinental bank booklet	28/9/2005	50,000,000.00
142	2050/2005	Diamond bank draft No. 01766041	23/11/2005	70,000,000.00
153	3314/2005	Bond bank draft No. 0000069	21/12/2005	100,000,000.00
155	2903/2007	Sterling Bank draft No. 00010708 dated 13/12/2007 valued N200,000,000	31/12/2005	200,000,000.00
251	951/2006	UBA Bank cheque No. 0001 dated 4/01/2006	24/4/2006	289,125,000.00
252	992/2006	FCMB cheque No. 1926 dated 24/4/2006	28/4/2006	288,000,000.00
259	1207/2006	Lion Bank cheque No. 4730 dated 5/09/2003	30/5/2006	46,682,737.50
				2,676,546,170.50

1.19. That you Mallam Nuhu Ribadu, while you held sway as the executive chairman of EFCC between 2003-2007, conspired with GT Bank in 2007 to divert the underlisted cheques and drafts valued at **N7.684 Billion** viz:

G.T.B draft No. 00074139 dated 24/10/2007	N 609,435,626.54
G.T.B draft Nos. 00001104, 00001105, 00127508	3,000,000,000.00
G.T.B draft No. 00001103 dated 24/9/2007	200,000,000.00
G.T.B draft No. 00127171 dated 24/9/2007	3,000,000,000.00
G.T.B draft No. 002 dated 29/01/2007	<u>875,000,000.00</u>
	<u>7,684,435,626.54</u>

1.20. That you Mallam Nuhu Ribadu, as executive chairman of EFCC, conspired with Mr. Ibrahim Lamorde about the year 2006, to conceal the details of shares in Skye Bank Plc, forfeited by Tafa Balogun, which you not only failed to disclose the number but only assigned arbitrary amounts to them totaling **N310,001,888.00**, which you also falsely claimed to have remitted to FG̃N/CBN as the said funds are not traceable to the said accounts.

	N
Shares converted to cash (Skye)	160,051,888.00
Shares converted to cash (Skye)	17,500,000.00
Shares converted to cash (Skye)	<u>132,450,000.00</u>
	<u>310,001,888.00</u>

1.21. That you Mallam Nuhu Ribadu, as executive chairman of EFCC, between 2003 and 2007, conspired with one Mustapha Abba Gana, to use the platform of one EFCC Recovery Account in Unity Bank Plc to launder the sum of **N25,800,000.00** on 7/05/2007 through forex purchase.

1.22. That you Mallam Nuhu Ribadu, as executive chairman of EFCC, between 2003 - 2007, conspired with Mr. Ibrahim Lamorde, one

Nagberi Helen and Unity Bank Plc, to steal the sum of ~~N~~5,184,780.00 through a counter cheque on 16/10/2007, a transaction which you did approve of knowing full well that the said account is 'non-chequing' and only transferable to victims of crime or CRF of the Federal Government.

1.23. That you Mallam Nuhu Ribadu, sometime in 2005, diverted the sum of ~~N~~426,974,288.40 out of the ~~N~~964,803,481.20 recovered from Basil Okolie & Others. While you held sway as the executive chairman of EFCC, you recovered the sum of ~~N~~964,803,481.20 from Basil Okolie & Others, on behalf of some Asian nationals. While you refunded the sum of USD 4,481,909.94, an equivalent of ~~N~~537,829,192.80 to the victims named Vivian & Juliania Ching, you were unable to account for the balance of ~~N~~426,974,288.40 as the said amount is not traceable to any EFCC Recovery Account maintained by EFCC.

1.24. That you Mallam Nuhu Ribadu, conspired with Mr. Ibrahim Lamorde and Unity Bank Plc between 16/08/2007 and 31/10/2007 to divert the sums of USD 52,200.00 and USD 5,000.000 being sums laundered by you and the accomplices through EFCC Recovery - Domiciliary account No. 20411933802004100.

1.25. That you Mallam Nuhu Ribadu, as executive chairman of EFCC, between 2003 and 2007, conspired with your director of operations then, Mr. Ibrahim Lamorde and now the Chairman EFCC, to divert the sum of Euro 32 Million and another USD 32.288 Million which both

of you confirmed were recovered in 2006 but the amounts are not traceable to any of EFCC's Recovery Accounts either in 2006 or beyond.

- 1.26. That you Mallam Nuhu Ribadu, recovered huge sums of money running into several billions of naira from politicians and government agencies between 2003 and 2007 but conspired with your director of operations then Mr. Ibrahim Lamorde to conceal and divert the recovered funds as they are not traceable to any Recovery Account operated/maintained by EFCC. You confirmed to the whole world at page 28 of EFCC Magazine called "Zero Tolerance" that you made the underlisted recoveries totaling **₦10.41 Billion** between 2003 and June 2006 which no known EFCC Recovery Account warehoused.

<u>Institution</u>	<u>Recovery</u>
Banks	727,919,064.00
Non-oil Sector companies	941,613,423.82
Oil sector Companies	2,249,265,960.00
States and L.Gs	6,500,000,000.00
	<u>10,418,798,447.82</u>

- 1.27. That you Mallam Nuhu Ribadu, conspired with Mr. Ibrahim Lamorde to divert and indeed diverted the funds recovered from Joshua Dariye while serving as governor of Plateau State. Despite the fact that Lamorde was part of the plot to divert the recovered funds, he released the sum of **₦105,827,614.00** to Plateau State Government on 23/11/2011 vide EFCC Recovery Account in CBN which never received any such funds.

1.28. That you Mallam Nuhu Ribadu conspired with Mr. Ibrahim Lamorde between 2005 and 2007 to conceal the actual recoveries from the much celebrated Emmanuel Nwude's case involving Nwude, Anajemba and one Nzeribe, having recovered over **N12.6 Billion** but falsely claimed that Sakaguchi (the victim of the scam) managed his funds in Nigeria, despite the fact that you handed over the sum of **USD 17 Million** to Sakaguchi few days after the case was disposed off in court in 2005. You were unable to disclose how much cash in foreign accounts was forfeited to EFCC then on the case under reference.

2.00. FARIDA WAZIRI

- 2.01. That you, Farida Waziri, as executive chairman of EFCC, between May, 2008 and November 2011, caused the sum of **₦1,031,823,841.88** in manager's cheque No. 00872573 dated 7/11/2008, being recovered funds kept in EFCC Recovery Account with Unity Bank Plc, to be diverted to EFCC Operations Account with Afribank (now Mainstreet Bank) and thereby misappropriated the said sum of recovered funds in violation of EFCC Establishment Act and Extant Financial Regulations.
- 2.02. That you, Farida Waziri, between 2008 and 2009, as executive chairman of EFCC, caused the sum of **₦1,094,498,611.91** and **\$25,700**, being recovered funds, to be wrongfully released to "EC's Office Abuja", i.e Executive Chairman's Office Abuja, being your office, instead of Consolidated Revenue Fund (CRF) of the Federation as required by EFCC Establishment Act and Extant Financial Regulations 2006.
- 2.03. That you, Farida Waziri, in 2010, as executive chairman of EFCC caused the sums of **₦364,831,615.68**, **\$30,440**, **£1,200** and **Euro 3,600**, being recovered funds to be wrongfully released to unidentifiable persons contrary to EFCC Establishment Act 2004.
- 2.04. That you, Farida Waziri in 2011 as executive chairman of EFCC caused the sum of **₦549,564,240.81**, **\$239,577.00**, **£10,000.00** and **Euro 32,747.08**, being recovered funds to be wrongfully released to unidentifiable persons in violation of EFCC Establishment Act 2004.

2.05. That you, Farida Waziri, between 2009 and 2011, as Executive chairman of EFCC, with intent to engage in corrupt enrichment, usurped the statutory functions of Federal Inland Revenue Service (FIRS) and conducted "tax investigation and assessment" of some companies, collected various sums as taxes for remittance to FIRS but FIRS could not confirm the receipt of remittances amounting to **₦1,767,594,842.65**, which has not been accounted for in violation of EFCC Establishment Act 2004.

2.06. That you, Farida Waziri, as executive chairman of EFCC abetted Spring Bank (now Mainstreet Bank), which warehoused the sum of **₦3,037,255,521.60**, being part of seized funds from Tafa Balogun, from disclosing the interest generated on the said funds between 2006 and 2008, estimated at over **₦546 Million**, in contravention of EFCC Establishment Act 2004 and Extant Financial regulations 2006.

2.07. That you, Farida Waziri, as executive chairman of EFCC, in conspiracy with Spring Bank and Access Bank, caused the transfer in June 2008 of the sum of **₦2,258,100,576.98** instead the sum of **₦3,037,255,521.60** from Spring Bank to EFCC Recovery Account with Access Bank and thereby wrongfully diverted the sum of **₦779,155,004.62** in violation of EFCC Establishment Act 2004.

2.08. That you Farida Waziri, in the bid to conceal this illegal interest revenue of over **₦546 Million** and other similar and related transactions, conspired with some officers in Access Bank to expunge the transactions between 30 July 2009- 7 Sept. 2010, in the relevant

accounts as if the Recovery Accounts recorded no transactions within the period of thirteen (13) months 30/7/2009-7/9/2010). The similar transactions which took place within that period include:-

- (i) Transfer of **₦9,500,000.00** on 22 April 2010, from Intercontinental A/c No. 0100193867 to the manipulated a/c No. 0005399921.
- (ii) This period was when taxes of over **₦2.9 Billion** was purportedly recovered on behalf of FIRS and over **₦1.7 Billion** could not be acknowledged as recovered by FIRS.
- (iii) Recoveries from Banks on Non-Performing loans of **₦199,639,859,766.00** which took place within this period.
- (iv) The sum of **₦300 Million** transferred to CBN A/c on 9 Sept. 2009 and withdrawn the same day may have been moved out of the Access Bank Account No. 0005399921.
- (v) All the purported releases to non identifiable persons amounting to over **₦1.7 Billion**, were within this same period which may have been expunged.

2.09. That you Farida Waziri, as executive chairman , EFCC set up a Committee between 2008 and 2009 to investigate how your predecessor Mallam Nuhu Ribadu, mismanaged seized funds and assets. The Committee made mind-bugling revelations which included discovery of **₦3.4 Billion** in stale cheques, **₦484,385,904.69** in uncashed drafts and **\$554,878.78** in Lagos Exhibit Room alone, but you negligently continued with the illegality as the said stale cheques

and drafts are still lying in EFCC's Exhibit room up to the time of your exit as chairman.

- 2.10. That you, Farida Waziri between 2009 and the time of your exit as the executive chairman of EFCC, through acts of omission or commission or collusion, negligently failed and or refused to take legal steps to void the illegal sales by Diya Fatimilehin & Co, of some landed assets forfeited by Tafa Balogun, to the "six (6) fictitious companies" (names ?) indicted by the Internal Committee you set up in 2008 to investigate how your predecessor Mallam Nuhu Ribadu managed forfeited assets and you thereby breached your oath of office.
- 2.11. That you, Farida Waziri on 15/11/2010 and 15/12/2010 as executive chairman of EFCC, with intent to steal, fraudulently made two payments based on garnishee order in favour of one Comrade Romanus Egis and others viz:- On 15/11/2010 the sum of ~~N~~49,470,400 through the EFCC Recovery Account No. 00200873-41-01-7 with CBN, and the exact amount was purportedly also paid out to the same persons on 15/12/2010 through EFCC Recovery Account NO. 0100193867, with Access Bank and thereby contravened the EFCC Establishment Act 2004.
- 2.12. That you, Farida Waziri, as the executive chairman of EFCC, with intent to conceal and misappropriate recovered funds, dishonestly wrote a letter Ref. No. EFCC/Account/006 dated 30th June, 2008 to the AGF seeking "clearance to open Accounts" with Intercontinental

Bank and Access Bank at the time EFCC already had multiple Recovery Accounts with the aforesaid banks viz: Access Bank A/c Nos. 0005399921, 0016624944, 0005444508 (dollars) 0005449682 (euro), 0005447705 (GBP) and Intercontinental Bank A/c 0100193867, and thereby breached your oath of office.

2.13. That you, Farida Waziri, as the executive chairman of EFCC, between 2008 and 2011, did conspire with Mohammed Kabir, DET. Sulaiman and Unity Bank Plc and diverted USD 22,984.70 on 19/3/2010, USD 9,993.10 on 6/4/2010 and USD 9,993.10 on 24/5/2010.

2.14. That you, Farida Waziri, after closing EFCC accounts with Unity Bank Plc, continued to operate some accounts-illegally to enable you have a smooth way in your money laundry activities.

2.15. That you, Farida Waziri, conspired with some officers in CBN to cause the sum of N53,314,102.00 to be transferred illegally from EFCC Recovery Account in CBN to Access Bank Recovery Account for the refund to Persianas Nig., on 4/12/2008, when there was no evidence in any of EFCC's Recovery Accounts that such money was ever recovered from Persianas Nig. and lodged in Recovery Account and therefore no basis to make such a refund.

2.16. That you, Farida Waziri, while you held sway in EFCC as executive chairman, conspired with some persons in the Nigeria Judicial Institute (NJI) about September 2008, to divert and indeed diverted several cheques and drafts valued at N1,678,345,000.00 but claimed

they were "lodged into EFCC Recovery Account, CBN". Some of the said cheques and drafts, as listed below and which were recoveries from NJI on 18/4/2008, are not traceable to any of EFCC's Recovery Accounts:

N

Cheque	184,316,745.11
Cheque	30,157,348.07
Draft	400,000,000.00
Cheque	985,123,668.20
Cheque	3,000,000.00
Cheque	450,000.00

3.00. IBRAHIM LAMORDE

3.01. That you Mr. Ibrahim Lamorde, as the executive chairman of EFCC in March 2013, in the bid to conceal a fraud of ~~N~~779,155,004.62, being the diverted amount from the forfeited funds by Tafa Balogun, falsified documents in response to the request made on you by duly constituted authorities, wherein you fraudulently stated the total of 13 bank balances as ~~N~~2,258,100,576.98 instead of ~~N~~3,037,255,521.60.

3.02. That you Mr. Ibrahim Lamorde, as the Director of operations, conspired with Mallam Nuhu Ribadu and some officers in EFCC, to manipulate the forfeitures and recoveries from DSP Alamsieyesigha, which events took place between 2006 and 2007, as if it took place about July 2008, with a view to shifting responsibilities to the regime or tenure of Mrs. Farida Waziri. By this act, you traded with the recoveries amounting to over ~~N~~3.7 Billion for almost 2 years before formerly documenting the transaction.

3.03. That you Mr. Ibrahim Lamorde, conspired with Mrs. Farida Waziri to transfer a lower amount of ~~N~~3,128,230,294.83 to the government of Bayelsa State on 18/1/2010 instead of ~~N~~4,257,503,009.23 being proceeds from the recoveries from DSP Alamieyesigha.

3.04. That you Mr. Ibrahim Lamorde, as the Director of operations between 2003 to 2007, Acting Chairman of EFCC between the period June 2007 to May 2008, a period your Chairman went on course to NIPSS, you conspired with some banks, especially Access Bank Plc and

Intercontinental bank Plc, to doctor and manipulate EFCC Recovery Accounts and expunge ALL entries relating to the recovered funds lodged in the said accounts between 2003 to May 2008, amounting to over **N800 Billion**.

3.05. That you Mr. Ibrahim Lamorde, conspired with Mrs. Farida Waziri and your External Auditors: Aminu Ibrahim & Co, (Chartered Accountants), to operate and conceal a Recovery Account in CBN and excluded the balances from your audited financial statements between 2005 and 2011, thereby deceiving the users of the financial statements, including the Executive, legislative and Judicial arms of government. The said balances excluded from the annual reports and accounts and which understated the balances of Seized Funds at the end of the respective years include:

Bal. at 31.Dec. (N)

2005	374,310,391.66
2006	533,804,882.45
2007	533,804,882.45
2008	486,990,780.45
2009	6,081,135,678.26
2010	3,306,936,863.43
2011	106,334,466.45

3.06. That you Mr. Ibrahim Lamorde, conspired with Mrs. Farida Waziri, about 11/3/2011 to under-remit the proceeds from Tafa Balogun's forfeitures to the Consolidated Revenue Fund A/c by **N3,200,306,084.93** on the actual amount alone. Instead of the

actual amount of **₦5,850,908,481.91** remittable to CRF, you conspired to remit only **₦2,650,602,396.98**, leaving behind a balance of **₦3,200,306,084.93**. Mr. Lamorde, you confirmed that as at March 2013, you are still holding back the sum of **₦2,409,380,875.67**.

3.07. That you Mr. Ibrahim Lamorde, conspired with Mrs. Farida Waziri to trade with the aforesaid proceeds from Tafa Balogun's forfeitures between 2008 and 2013 at interest of 12% per annum, amounting to **₦2,154,625,556.37**, an amount you have been unable to account for, thereby making you liable to remit the total sum of **₦5.354 Billion** to the CRF viz:

	N
Actual unremitted balance	3,200,306,084.93
Accrued interest not remitted	<u>2,154,625,556.37</u>
	<u>5,354,931,641.30</u>

3.08. That you Mr. Ibrahim Lamorde, as the executive chairman of EFCC on the 17th day of January, 2012, withdrew or caused to be withdrawn, the sum of **₦183,124,185.95** vide an instruction Ref. EFCC/Access/PS/01/01/ January 09, 2012, from EFCC Recovery Account in Access Bank Plc knowing full well that remittances from Recovery Account should go to either the victims of crime or the Consolidated Revenue Fund of the Federal Government. This you did in breach of of EFCC Establishment Act, 2004 and Extant Laws.

3.09. That you Mr. Ibrahim Lamorde, as the executive chairman of EFCC, have continued to conceal the details of the unsold properties

forfeited by both Tafa Balogun and DSP Alamiyesigha despite receiving rent revenues from some estate agents on the said properties. For examples

Date	Estate Agent	Amount Received (N)	Bank
28/3/2012	Etudo & Co	70,655,872.47	Access
13/9/2012	Etudo & Co	99,063,241.75	Access
6/3/2013	Etudo & Co	<u>15,944,222.40</u>	Access
		<u>185,663,336.62</u>	

3.10. That you Mr. Ibrahim Lamorde, as head of operations, in EFCC conspired with Mrs. Farida Waziri and one Mukhtar on 12/1/2011 to divert the sum of ~~N~~50,000,000 vide mandate Ref. EFCC/ACCESS/RCV/01/01/2011, being proceeds from five (5) FBN drafts (Nos. 7230418-7230422)

3.11. That you Mr. Ibrahim Lamorde, conspired with one Mustapha Abba Gana and Unity Bank Plc, about January 2008 to divert the sum of USD 25,000.00, laundered through EFCC Domiciliary Account with Unity Bank Plc, knowing full well the account, being a Recovery account is transferable only to the Consolidated Revenue Fund with CBN and no other.

3.12. That you Mr. Ibrahim Lamorde, while you held sway in EFCC as acting chairman, while your boss, Mallam Nuhu Ribadu was on course at NIPSS, conspired with certain persons in the Nigeria Judicial Institute in September 2008, to divert several cheques and drafts valued at ~~N~~1,678,345,000.00 but claimed they were "lodged into

EFCC Recovery Account, CBN". Some of the said cheques and drafts as listed below, and which were recoveries from NJI on 18/4/2008 are not traceable to any of EFCC's Recovery Accounts.

	N
Cheque	184,316,745.11
Cheque	30,157,348.07
Draft	400,000,000.00
Cheque	985,123,668.20
Cheque	3,000,000.00
Cheque	450,000.00

3.13. That you Mr. Ibrahim Lamorde, conspired with PAM INVESMENT PROPERTIES LTD to conceal some of the proceeds from the sale of forfeited properties, which they held on to since 2006-2007 until a dramatic part payment on 29/9/2011 of **N592,019,667.35** through EFCC Recovery Account No 0005399921 with Access Bank.