

SS/S2/101/20

8<sup>th</sup> June, 2020

## THE CHAIRMAN

Screening Committee for  
Edo State Gubernatorial Election,  
All Progressive congress (APC),  
C/o National Secretariat,  
40 Blantyre Street,  
Wuse 2, Abuja.



Dear Sir,

### PETITION FOR THE DISQUALIFICATION OF GODWIN OBASEKI FROM PARTICIPATING IN THE GUBERNATORIAL PRIMARY ELECTION FOR EDO STATE

We are solicitors to **Edobor Williams, Ugbesia Abudu Godwin** and **Amedu Dauda Anakhu** (hereinafter referred to as our clients) and have their instructions to enter this petition.

Our clients are loyal members of the All Progressives Congress and are passionate about the success of the party in the forthcoming Governorship election in Edo State. Arising from this, our clients conducted discreet investigations unto the background of Godwin Obaseki, the Governor of Edo State who has openly boasted that his second term was not negotiable. Arising from the said investigations, our clients found the following;

#### 1) FALSE AFFIDAVIT

- i) That Godwin Obaseki submitted false Affidavit to INEC on 12<sup>th</sup> July, 2016 contrary to the provisions of Section (5) and (6) of the Electoral Act.
- (ii) That the Peoples Democratic Party suspected the Affidavit to be false and got their Lawyers to write to the FCT High Court requesting for a Certified True Copy of the Affidavit on 2<sup>nd</sup> September, 2016.

- iii) That FCT High Court replied on 28<sup>th</sup> October, 2016 that the "Affidavit of loss deposed to by one **Godwin Nogheghase Obaseki** and dated 7<sup>th</sup> June, 2016 does not emanate from the High Court of Justice, Abuja, FCT".
- iv) That the letter from FCT High Court clearly established the element of false Affidavit on the part of Godwin Obaseki which makes him disqualified.
- v) That any political party that fields such a disqualified candidate would be fined under **Section 31(8) of the Electoral Act**.
- vi) That the said Godwin Obaseki has not only expressed his intention to run for the post of Governor of Edo State, he has obtained the nomination form from APC.
- vii) That our client has initiated the appropriate legal processes to have Godwin Obaseki investigated for his conduct in forging/falsifying a public document and submitting same to INEC for official use.

## **2. FALSE/FORGED EDUCATIONAL CERTIFICATES**

- i) Godwin Obaseki submitted his Form CF.001 to INEC on 12<sup>th</sup> July, 2016 wherein he stated that he obtained a Degree in Classical Studies in the University of Ibadan in three (3) years after gaining admission from Eghosa Grammar School with only 3 credits in his Ordinary Level Certificate scores in 1976.
- ii) It is indeed very questionable when one imagines how Mr. Obaseki secured admission into University of Ibadan with just three (3) credits in his Ordinary Level Certificate at a time when the educational system was purely on merit.
- iii) The three (3) years degree program for Classical Studies at the University of Ibadan was and is still applicable to only students with Advanced Level Certificate/Diploma/NCE. How then did Mr. Obaseki who claimed that he was admitted into the University from Eghosa Grammar School after securing his Ordinary Level Certificate with three (3) credits?
- iv) The course duration for students admitted with Ordinary Level Certificate is four (4) years and not three (3) years as claimed by Godwin Obaseki.

- v) Mr. Obaseki has never publicly claimed that he has A Level Certificates in any of his Affidavits or INEC form.
- vi) The problem with Mr. Obaseki's educational history is that it appears fraudulent as no explanation has been reasonably offered why a four (4) years academic program was completed in three (3) years against the established course requirement for the completion of a Degree Program in Classical Studies.

### 3. EXHIBITS

The following are attached as Exhibits;

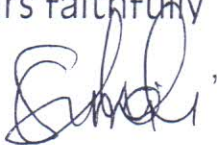
- a) Affidavit dated sworn to on 7<sup>th</sup> June, 2016.
- b) Letter from Ferdinand Orbih, SAN, dated 2<sup>nd</sup> September, 2016.
- c) Letter from FCT High Court dated 28<sup>th</sup> October, 2016.
- d) Form CF. 001 submitted to INEC on 12<sup>th</sup> July, 2016.
- e) University of Ibadan revised/New Requirement for U.T.M.E and Direct entry.

### 4. PRAYER

We wish to draw the attention of the Committee to the decision of the Supreme Court in **SC.1/2020; PDP & Ords. V. Degi-Eremienyo & Ords**, delivered on 13<sup>th</sup> February, 2020 (unreported). The Supreme Court held that an Affidavit or declaration amounts to a certificate and given false information on oath and presenting same to INEC is equivalent of presenting a forged or false certificate to INEC. The sanction for this is a disqualification of such candidate.

We therefore, respectfully, urge you to disqualify Mr. Godwin Obaseki from participating in the said primary election for the reasons hereinbefore given.

Yours faithfully



**Chisimdi M. Chima**





THE HIGH COURT OF THE FEDERAL CAPITAL TERRITORY  
IN THE ABUJA JUDICIAL DIVISION  
HOLDEN AT ABUJA

AFFIDAVIT OF LOSS OF ORIGINAL PRIMARY, SECONDARY,  
UNIVERSITY AND NATIONAL YOUTH SERVICE CORPS  
CERTIFICATES

I **GODWIN NOGHEGHASE OBASEKI** male, Christian a Nigerian Citizen from Edo State of No. 8, Commercial Avenue Benin City do hereby make oath and state as follows.

1. That I attended **ST MATHEWS ANGLICAN PRIMARY SCHOOL SAKPONBA ROAD BENIN CITY FROM 1963 TO 1968**, where I obtained my primary school leaving certificate in 1968.
2. That after I finished my primary school education at St Mathews Anglican primary school, I proceeded to **EGHOSA ANGLICAN GRAMMAR SCHOOL** where I sat for the West African Examination Council Examination and obtained my Secondary School leaving certificate in June 1973.
3. That after I finished my secondary school education at **EGHOSA ANGLICAN GRAMMAR SCHOOL**, I proceeded to the great **UNIVERSITY OF IBADAN** where I obtained my degree of Bachelor of Arts in classical studies in 1976.
4. That as a good Nigerian citizen I also proceeded to serve my country under the compulsory **National Youth Service Corps (NYSC) Program** between 7<sup>th</sup> of August 1979 to 6<sup>th</sup> of August 1980 where I obtained my NYSC certificate discharge dated 6<sup>th</sup> of August, 1980.

5. That all originals of my above said certificate are kept in safe custody in my office but unfortunately during the process of relocating from one office to another I misplaced the Original of the above said Original Documents.
6. That I have applied to my primary school, my secondary school, my university and the National Youth Service Corps(NYSC) for re-issuance of the said certificates or a Certified True Copy (CTC) of the Original certificates.
7. That what I have with me now are photocopies of the secondary school leaving certificate, university leaving certificate and the NYSC discharge certificate.
8. That I make this oaths for record purpose pending the re-issuance of the original certificate or the Certified True Copy (CTC).
9. That I depose to this affidavit in good faith believing same to be true in accordance with the oaths Act 2004.

  
.....  
DEPONENT

SWORN TO AT  
The FCT High Court Registry

Dated this 7 day of June 2016

BEFORE ME

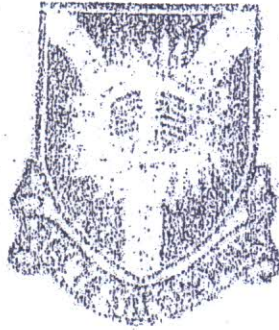
COMMISSIONER FOR OATHS

*Handwritten:*  
7/6/16

*Handwritten:*  
1010424509  
Date 7/6/2016



# University of Ibadan



**Godwin Nygheghase Obaseki**

having fulfilled all the requirements of the University  
and passed the prescribed examinations has this  
day been admitted to the degree of

**Bachelor of Arts**

**Classical Studies**

with Second Class Honours (Lower Division)

INEC HQTRS ABUJA  
RECEIVED  
12 JUL 2016  
Legal Services Dept. Clearance  
Sign.....

CERTIFIED TRUE COPY  
INEC HQTRS ABUJA  
25 AUG 2016  
SABARA O.O. (MRS)  
As Director  
Sign.....

*[Signature]*  
VICE-CHANCELLOR

July 6, 1979

*[Signature]*  
REGISTRAR

# FERD ORBIH (SAN) & CO.

ABUJA BRANCH OFFICE

Plot 2, Plot 1802

DRIVE,

Ilshu, Gase, Area 3, Garki,

ABUJA.

Federal Capital Territory.

Tel 07097676597, 08124679824, 08098608092,

E-mail: ferdorbih@san.abuja@gmail.com

LEGAL PRACTITIONERS AND CHARTERED ARBITRATORS

LAGOS BRANCH OFFICE

25 Fola Osika Road,

Off Adebayo Doherty Street, Lekki,

PHASE 1, Lagos.

Tel: 01-2695054

BENIN HEAD OFFICE

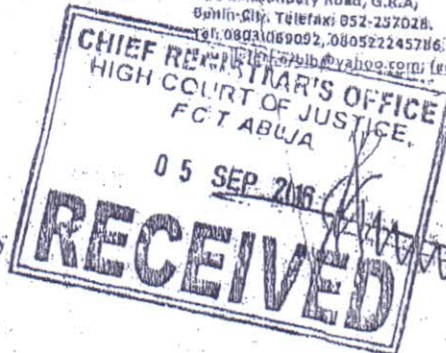
Chief M.C.K. ORBIH LAW CENTRE, CHRISTIANA ORBIH

By 66A Boundary Road, G.R.A

Benin City. Telefax: 052-257028.

Tel: 0809169092, 080522245786.

E-mail: ferdorbih@yahoo.com; ferdorbih@gmail.com



2<sup>nd</sup> September, 2016

The Chief Registrar  
High Court of the Federal Capital Territory  
Maitama - Abuja

Dear Sir,

**RE: AFFIDAVIT OF LOSS OF ORIGINAL PRIMARY, SECONDARY, UNIVERSITY AND NATIONAL YOUTH SERVICE CORPS CERTIFICATES DEPOSED TO BY GODWIN NOGHEGHASE OBASEKI**

**APPLICATION FOR CERTIFIED TRUE COPY OF THE AFFIDAVIT PURSUANT TO THE RELEVANT PROVISIONS OF THE FREEDOM OF INFORMATION ACT**

The above subject matter refers.

On the 7<sup>th</sup> day of June, 2016, one Godwin Nogheghase Obaseki deposed to an Affidavit titled "AFFIDAVIT OF LOSS OF ORIGINAL PRIMARY, SECONDARY, UNIVERSITY AND NATIONAL YOUTH SERVICE CORPS CERTIFICATES" before Commissioner for Oath of the High Court of the Federal Capital Territory, Abuja. Attached herewith is a copy of the said Affidavit of Godwin Nogheghase Obaseki dated 7<sup>th</sup> day of June, 2016, marked as ANNEXURE A for your kind attention.

We, hereby, apply for the Certified True Copy of the said Affidavit under the Freedom of Information Act.

We have paid the requisite fee for the requested service and attached herewith and marked ANNEXURE B is a copy of the receipt of payment.

While thanking you for your usual cooperation, we anticipate your kind, prompt and favourable consideration of our application.

Please accept the assurances of our highest regards.

Yours Faithfully,

For: Ferd Orbih (SAN) &

CHIEF FERDINAND ORBIH, SAN, FCIARB.

C. P. ANINWOTA, ESQ





OFFICE OF THE CHIEF REGISTRAR  
HIGH COURT OF THE  
FEDERAL CAPITAL TERRITORY  
Plot 426, Tigris Crescent, Wajirama, P.M.B. 85, Abuja



FERD ORBIT (SAN) & CO  
FLAT 2, PLOT 1692,  
DRIVE ILESHA CLOSE,  
AREA 3, GARKI, ABUJA

ATTENTION: C.P. ANINHOYA, ESQ

Sir,

AFFIDAVIT OF LOSS OF ORIGINAL PRIMARY, SECONDARY,  
UNIVERSITY AND NATIONAL YOUTH SERVICE CORPS  
CERTIFICATES DEPOSED TO BY GODWIN NOGHEGHASE  
OBASEKI - APPLICATION FOR CERTIFIED TRUE COPY OF  
AFFIDAVIT PURSUANT TO THE RELEVANT PROVISIONS OF  
THE FREEDOM OF INFORMATION ACT

With reference to your letter dated the 2<sup>nd</sup> September 2016 in respect of the  
above subject matter, we write to inform you that the attached copy of  
affidavit of loss deposed to by one **GODWIN NOGHEGHASE OBASEKI**  
and dated 7<sup>th</sup> June 2016 does not emanate from the High Court of Justice,  
Abuja FCT.

Accept the assurances of the Chief Registrar, regards, please.

ALHASSAN SALIHU ZUBA  
HOD (ENFORCEMENT)



**INDEPENDENT NATIONAL  
ELECTORAL COMMISSION**

**Affidavit in support of Personal  
Particulars of persons seeking election to the  
Office/Membership of**

*Governor*

**CONSTITUENCY:** *FDO STATE*

**STATE:** *FDO*

STATE GOVERNMENT ABUJA  
RECEIVED  
LEGAL COUNSEL  
Legal Services Dept. Clearance  
Sign: *[Signature]*



**Affidavit in support of Personal Particulars of persons seeking election to the office of Chairman, Vice Chairman or Councilor of Area Council, Membership of State House of Assembly, House of Representatives or Senate, Office of Governor, Deputy Governor, President or Vice President.**



I, GODWIN NOGHEGHASE OBASEKI

hereby make oath and declare that I am the person seeking election into the office of GOVERNOR in the OREDO (EDO STATE) Constituency and the particulars given hereunder are true and to the best of my knowledge.

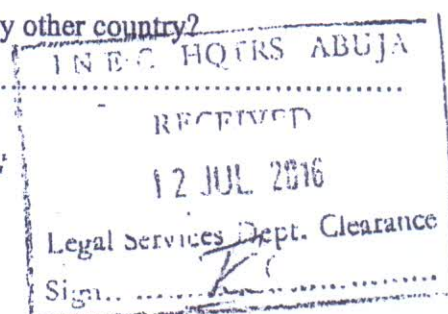
**PART A**

Office being contested for: GOVERNOR  
 Name of Constituency: OREDO - EDO STATE  
 Code of Constituency: .....  
 Name of Political Party: ALL PROGRESSIVES CONGRESS (APC)  
 Party membership No. 0348713  
 (Please attach a copy of the membership card)

**PART B**

**A PERSONAL PARTICULARS**

1. Surname (in block letters) OBASEKI
2. Other names (in block letters) GODWIN NOGHEGHASE
3. Former name(s) N/A
4. Residential Address NO 8 COMMERCIAL AVENUE GRA  
BENIN CITY
5. Telephone No. +234 803 308 0644
6. E-mail Address gobaseki@gmail.com
7. Nationality NIGERIAN
8. Did you change nationality in the past? If so, what was your former nationality? NO
9. Have you voluntarily acquired citizenship of any other country? (If yes, what country?) NO





10. Have you made a declaration of allegiance to that or any other country (If yes, specify the country) ..... NO .....

11. Date of birth 01 JULY - 1957 Age (last birthday) 59 YEARS .....

(Attach evidence)

12. Place of Birth BENIN CITY .....

13. Occupation STOCKBROKER .....

**B EDUCATIONAL INSTITUTIONS ATTENDED WITH DATES:**

1. Primary Schools ST MATTHEWS ANGLICAN PRIMARY SCHOOL, BENIN CITY (1963-1968) .....

2. Secondary Schools (including Teachers, Commercial, Technical and equivalent institutions) EGHOSH ANGLICAN GRAMMER SCHOOL (BENIN CITY (1969-1973)) .....

3. Tertiary institutions (including Universities and Colleges)

1) UNIVERSITY OF IBADAN, IBADAN NIGERIA (1976-79)

2) PACE UNIVERSITY GRADUATE SCHOOL OF BUSINESS, NEW YORK

**C. EDUCATIONAL QUALIFICATIONS WITH DATES:**

1) WEST AFRICAN SCHOOL LEAVING CERTIFICATE (1973) .....

2) BACHELOR OF ARTS, (B.A HONS) CLASSICAL STUDIES (1976)

3) MASTERS IN BUSINESS ADMINISTRATION MBA (1994) .....

Attach evidence of all educational qualifications.

**D (i) WORKING EXPERIENCE WITH DATES:**

Name of Employer	Period of work	Reasons for leaving (Please attach evidence)
CAPITAL TRUST BROKERS LTD	1984 - 1986	MOVED TO ANOTHER JOB
INTERNATIONAL MERCHANT BANK	1986 - 1988	MOVED TO ANOTHER JOB
THE FUNDS LIB, LAGOS	1988 - 1989	LEFT FOR GRADUATE SCHOOL
AFRINVEST LIMITED	1994 - 2016	

INEC HQS ABUJA

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(ii) Have you ever been dismissed from the Public Service of the Federation, State or Local Government/Area Council? If yes, give details:

NO

**E. GENERAL:**

1. Have you ever been adjudged a lunatic or declared to be of unsound mind? If yes, give details:

NO

2. Are you under a sentence of death, imprisonment or fine, for any offence involving dishonesty or fraud or any offence imposed by a Court or Tribunal?

NO

3. Have you in the last ten years been convicted and/or sentenced for an offence involving dishonesty? (If so, give details including charge No., place of trial, etc?)

NO

4. Have you ever been involved in any bankruptcy proceedings? If so, state where proceedings took place and the findings of the inquiry.

NO

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Sign. <i>K.S.</i>



5. Have you ever been convicted by the Code of Conduct Tribunal? If yes, state details ..... NO

6. Have you ever presented a forged Certificate to INEC? If yes, give details:..... NO

7. (a) State with full details the names and addresses of Clubs, Societies, Associations or Unions you belong to or have belonged to in the past (use additional sheets if necessary)

- 1) F.B.O. RENAISSANCE GROUP, LAGOS
- 2) IKOYI CLUB, LAGOS
- 3) BENIN CLUB, BENIN CITY
- 4) JUNIOR ACHIEVEMENT OF NIGERIA

(b) Do you or have you ever belonged to a Secret Society? If yes, give the details ..... NO

8. Give any other information about your person .....

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 Sign. [Signature]



**F. DECLARATION BEFORE A COMMISSIONER FOR OATHS, IN THE HIGH COURT.**

I hereby declare that all the answers, facts and particulars I have given in this Form are true and correct and I have to the best of my knowledge fulfilled all the requirements for qualification into the office I am seeking to be elected.

  
DEPONENT

Sworn to at the High Court Registry, Benin-City

This 11<sup>th</sup> Day of July, 2016

BEFORE ME



COMMISSIONER FOR OATHS:  
BARR. (MRS) F. A. IDEHEN  
ASSISTANT DIRECTOR  
HIGH COURT REGISTRY  
BENIN CITY

*John P. 200*

*Ans 5797488*  
HIGH COURT REGISTRY  
BENIN CITY, EDO STATE  
NIGERIA - 16  
DATE.....

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Sign... *Ks*

**UNIVERSITY OF IBADAN**  
**IBADAN**

**REVISED / NEW REQUIREMENTS FOR THE U.T.M.E. AND DIRECT ENTRY**

SN	Faculty	Programme	REVISED REQUIREMENTS			Special Consideration (Waiver) Remarks
			Direct Entry	UTME Subjects	UTME	
5	Arts	Arabic Studies 10402F	Two 'A' level passes in Arabic and any other Arts or Social Science subjects	English Language, Arabic and any other two from Arts, Science or Social Sciences	5 'O' level subjects at one sitting or 6 'O' level subjects at two sittings to include: English Language, Arabic and any other subjects from Arts or Social Sciences.	IBADAN accepts: (i) NCE with at least merit in Arabic and other Arts or Social Science subjects. (ii) Diploma in Arabic and Islamic Studies from U.I. and other Nigerian Universities.
6	Arts	Archaeology 10425D	2 'A' level passes in any two Arts subject.	English Language and any 3 subjects from the following: Government, History, Religious Studies, Literature in English, Hausa/Igbo/Yoruba, Geography and Economics	5 'O' level subjects at one sitting or 6 'O' level subjects at 2 sittings to include English Language, History, Government, Lit-In-English, Religious Studies, Economics, Biology, Hausa/Igbo/Yoruba.	IBADAN accepts Geography, Economics, and Sociology at Advanced level.
7	Arts	Archeology Combined Degrees in any of the Followings: History, Classics, Religious Studies 10525G	Same as Above	Same as Above	Same as Above	Same as Above
8	Arts	Classics 10460K	(i) Two 'A' level passes including Lit-In-English or History. (ii) NCE in relevant subjects	English Language, Literature in English or History and any other two subjects.	5 'O' level Credits at one sitting or 6 'O' level Credit at two sittings to include English Language, Literature in English or History, one Arts or Social Science subjects and any other subjects.	