

for SERVICE COPY

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

CHARGE NO: FHC/FHC/C/03/2019

BETWEEN

Inspector General of Police

!!! Complainant

AND

1. Ezeimo Anthony Prince (alias Ikenga;
alias Oriji Osinachi)
2. Amaechi Benedict
3. Owghonda Karaka Badaziri
4. Nnamani Chijioke Michael
(alias C.J. Pyramid)
5. Abuno Jonathan C.
6. Blackson Nwokeoma
7. Opara Harmelson Nnamdi



AMENDED CHARGE

COUNT I:

That you Ezeimo Anthony Prince (alias Ikenga; alias Oriji Osinachi) "M", Amaechi Benedict "M"; Owghonda Karaka Badaziri "M"; Nnamani Chijioke Michael (alias C.J. Pyramid) "M"; Abuno Jonathan C; Blackson Nwokeoma and others now at large sometime between 1st January, 2018-31st December, 2018 at Madonna University, Okija Campus within the jurisdiction of this Honourable Court did conspire to commit felony to wit: sending false messages or causing false messages that you knew to be false to be sent by means of computer system or networks for the purpose of causing annoyance, inconvenience, danger, insult, injury, criminal intimidation, enmity, bodily harm, harm to reputation, hatred, ill-will or needless anxiety to Mr. Titus Ugwu (Chief Security Officer of Madonna University, Nigeria) and Madonna University, Nigeria and you thereby committed an offence punishable under section 27(1) (b) of the Cybercrimes (Prohibition, Prevention, etc) Act, 2015.

COUNT II:

That you Ezeimo Anthony Prince (alias Ikenga; alias Oriji Osinachi) "M" on or about November, 2018 at Madonna University Okija Campus within the jurisdiction of this Honourable Court knowingly sent a message on a social media network which you created known as Great Madonnites by means of computer system or networks to wit:

"Information reaching me now confirms that Yobo the madman who became the CSO of Madonna University has kidnapped Kaka again.

He did this last Friday in collaboration with officers of SARS. Kaka was abducted from his residence at Okija town."

which message you knew to be false for the purpose of causing annoyance, inconvenience, danger, insult, injury, criminal intimidation, enmity, hatred, ill will or needless anxiety to Mr. Titus Ugwu (Chief Security Officer of Madonna University, Nigeria), the Madonna University, Nigeria and its management and staff and you thereby committed an offence punishable under **section 24(1)(b) of the Cybercrimes (Prohibition, Prevention, etc) Act, 2015.**

COUNT III:

That you **Ezeimo Anthony Prince (alias Ikenga; alias Oriji Osinachi) "M"** on or about November, 2018 at Madonna University Okija Campus within the jurisdiction of this Honourable Court knowingly sent a message on a social media network which you created known as Great Madonnites by means of computer system or networks to wit:

"MADONNA UNIVERSITY IS A DEATH TRAP

Whenever I say the management of this University is evil minded people seem not to understand. We have just been informed that some students were brought from Okija campus and locked up in a room at security department at Elele. For two days they were denied food and water. I think the intention is to kill them. Please, parents and guidance if you have a ward in that campus call and find out their whereabouts."

which message you knew to be false for the purpose of causing annoyance, inconvenience, danger, insult, injury, criminal intimidation, enmity, hatred, ill will or needless anxiety to the Madonna University, Nigeria and its management and staff and you thereby committed an offence punishable under **section 24(1)(b) of the Cybercrimes (Prohibition, Prevention, etc) Act, 2015.**

COUNT IV

That you **Amaechi Benedict "M" and Owhonda Karaka Badaziri "M"** on or about the 12th day of December, 2018 at Madonna University Okija Campus within the jurisdiction of this Honourable Court knowingly sent or caused to send a message on

a social media platform which you created known as Itz Madonna by means of computer system or networks to wit:

"Information reaching me now confirms that Yoba the madman who became the CSO of Madonna University has kidnapped Kaka again. He did this last Friday in collaboration with officers of SARS. Kaka was abducted from his residence at Okija town..."

which message you knew to be false for the purpose of causing annoyance, inconvenience, danger, insult, injury, criminal intimidation, enmity, hatred, ill will or needless anxiety to Mr. Titus Ugwu (Chief Security Officer of Madonna University, Nigeria), the Madonna University, Nigeria and its management and staff and you thereby committed an offence punishable under section 24(1)(b) of the Cybercrimes (Prohibition, Prevention, etc) Act, 2015.

COUNT V:

That you Amaechi Benedict "M" and Owhonda Karaka Badaziri "M" on 26th day of November, 2018 at Madonna University Okija Campus within the jurisdiction of this Honourable Court knowingly sent or caused to send a message on a social media platform which you created known as Itz Madonna by means of computer system or networks to wit:

"THE YOUNG MISS STEPHANIE DIED OF DIABETIC COMPLICATIONS ON THE 26TH OF NOVEMBER 2018 AT MADONNA UNIVERSITY OKIJA CAMPUS.

UNTIL HER DEATH SHE WAS A FINAL STUDENT OF BUSINESS ADMINISTRATION.

ALTHOUGH THE STORY COULD HAVE BEEN BETTER IF THE "S.S.U" HAD SIGNED EXEAT FOR HER WHEN SHE REQUESTED FOR IT BUT NO THEY DECIDED TO KILL HER WITHOUT A GUN..."

which message you knew to be false for the purpose of causing annoyance, inconvenience, danger, insult, injury, criminal intimidation, enmity, hatred, ill will or needless anxiety to Madonna University, Nigeria and its management and staff and you thereby committed an offence punishable under section 24(1)(b) of the Cybercrimes (Prohibition, Prevention, etc) Act, 2015.

COUNT VI:

That you Amaechi Benedict "M" and Owhonda Karaka Badaziri "M" on 27th day of November, 2018 at Madonna University Okija Campus within the jurisdiction

of this Honourable Court knowingly sent or caused to send a message on a social media platform which you created known as Itz Madonna by means of computer system or networks to wit:

"...At this point one begins to wonder if NUC actually have a standard an institution have to meet before accrediting their various departments. You don't expect a prestigious faculty of Law having just four lecturers, an e-library made up of borrowed computers from various departments which were returned after accreditation with outdated legalpedia, unsubscribed lexis and nexis (which are the only law e-research books or platforms they have). The only institution where law student source their information from Wikipedia. where else does this happen if not in Madonna University. As we speak, Madonna University has only four (4) lecturers at the Faculty of Law. The fifth lecturer one Barr. David Onyemata was sacked by CSO called Yobo for admitting a student who has tattoo on his chest. If your child or ward in at the faculty of law ask him or her.

Today students who are found in Madonna University are either there because of their stubborn parents who ignorantly believe that Fr Edeh is a man of God or they mistakenly got trapped in there out of desperation for admission.

Madonna University Nigeria is definitely the only University in the country which gets most of its new students when other institutions in country have closed their admission therefore leaving desperate candidates with no choice than fall into death trap called Madonna university where you are imprisoned until the day you got expelled or you mistakenly graduate. (I am using "it's" in place of "her" for a purpose, "her" is used for a productive attributes).

Madonna as of today is not a University, but a den of iniquities. It is worse than an IDP camp. Students of Madonna University gnash their teeth in regret. The only crime they committed was seeking for admission in Madonna University.

Let the press go into investigation, you will be shocked at what you will discover. Where are the human rights activists?? Where are the human rights lawyers like Femi Falana?? So much evil is going on in Madonna University on daily basis and students are helpless.

Madonna is the only university where students will die, and nobody talks about it. any priest that makes mistake and mentions it publicly will be removed immediately.

Madonna is the only University where a former madman called Yobo has all the right to sack any member of staff without the consent of the Vice Chancellor.

Madonna is the only University where a former madman called Yobo has all the right to expel any student even those who have written their final exam because the student has bears or he/she is discussing with an opposite sex. This he does without panel or questions.

Madonna is the only University where some students can be kidnapped from Okija Campus to Elele, locked up in a room for three days without food or water. This is usually carried out by the same former madman called Yobo.

Nigerians must raise up and speak against the man's inhumanity to man going on in Madonna University. The NUC and other agencies responsible for regulations should stop collecting bribe from Fr. Edeh and stop the slavery that is going on that IDP camp called school."

which message you knew to be false for the purpose of causing annoyance, inconvenience, danger, insult, injury, criminal intimidation, enmity, hatred, ill will or needless anxiety to Mr. Titus Ugwu (Chief Security Officer, Madonna University, Nigeria), Madonna University, Nigeria and its management and staff and you thereby committed an offence punishable under **section 24(1)(b) of the Cybercrimes (Prohibition, Prevention, etc) Act, 2015.**

COUNT VII:

That you **Amaechi Benedict "M" and Owhonda Karaka Badaziri "M"** on or about November, 2018 at Madonna University Okija Campus within the jurisdiction of this Honourable Court fraudulently or dishonestly made use of the unique identification of the Incorporated Trustees of Madonna International Charity Peace Award Foundation to create a social media platform known as Itz Madonna and you thereby committed an offence punishable under **section 22(2)(a) of the Cybercrimes (Prohibition, Prevention, etc) Act, 2015.**

COUNT VIII:

That you **Amaechi Benedict "M" and Owhonda Karaka Badaziri "M"** on or about January, 2019 at Madonna University Okija Campus within the jurisdiction of this

Honourable Court fraudulently or dishonestly made use of the unique identification of the Incorporated Trustees of Madonna International Charity Peace Award Foundation to create a social media platform known as Itz Madonna MEDIA and you thereby committed an offence punishable under **section 22(2)(a) of the Cybercrimes (Prohibition, Prevention, etc) Act, 2015.**

COUNT IX

That you **Nnamani Chijioke Michael (alias C.J. Pyramid)** "M" on or about the 15th day of December, 2018 at Madonna University Okija Campus (or such other places where you accessed social media network) within the jurisdiction of this Honourable Court knowingly or intentionally transmitted or caused the transmission of a communication through a computer system or network to bully, threaten or harass the men and officers of the Nigerian Police thus:

"Ikenga on a second tot, lose guard and allow them track u to my village...Forget about what my village people will do to them...The remaining story will be on net."

Which communication placed them in fear of death, violence or bodily harm and you thereby committed an offence punishable under **section 24(2)(a) of the Cybercrimes (Prohibition, Prevention, etc) Act, 2015.**

COUNT X

That you **Nnamani Chijioke Michael (alias C.J. Pyramid)** "M" on or about 15th day of December, 2018 at Madonna University Okija Campus within the jurisdiction of this Honourable Court knowingly or intentionally transmitted or caused the transmission of a communication through a computer system or network to bully, threaten or harass Mr. Titus Ugwu (the Chief Security Officer of Madonna University, Nigeria) to wit:

"Better tell that tyrant u call Yobo that if anything happens to kaka, I personally will import mad people from Obiagu and Abakpa in Enugu so he can compete with them...Nonsense"

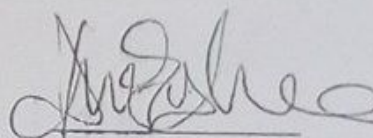
Which communication placed him in fear of death, violence or bodily harm and you thereby committed an offence punishable under **section 24(2)(a) of the Cybercrimes (Prohibition, Prevention, etc) Act, 2015.**

COUNT XI

That you **Opara Harmelson Nnamdi "M"** and others now at large, on the same date, place and within the aforementioned judicial Division did fraudulently and honestly post a white man's picture named John Mark Gomez in a social media

network and use it to defraud Jorge Marian while chatting with her in the social media network through your account nos. 13854084 GT Bank, 211861252 UBA and 0793837042 Access Bank by sending electronic messages which is a material misrepresentation of facts and which she placed reliance and you defrauded her to the tune of Two Million Six Hundred Thousand Naira (N2,600,000.00) and you thereby committed an offence punishable under section 14(2) of the Cybercrimes (Prohibition, Prevention, etc) Act, 2015.

Dated 18th day of March, 2019



A.N. Obo, Esq.
Prosecution Counsel
Legal Department
State C.I.D, Awka
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SERVICE ON THE DEFENDANTS

1. Ezeimo Anthony Prince (alias Ikenga;
Alias Oriji Osinachi)
2. Amaechi Benedict
3. Owhonda Karaka Badaziri
4. Nnamani Chijioke Michael
(alias C.J. Pyramid)
5. Abuno Jonathan C;
6. Blackson Nwokeoma
7. Opara Harmelson Nnamdi

