

4043-2025  
4153an Filed at: 2025

**IN THE FEDERAL HIGH COURT**  
**IN THE LAGOS JUDICIAL DIVISION**  
**HOLDEN AT LAGOS**

SUIT NO: **HC/LJ/453/25**

**IN THE MATTER OF AN APPLICATION BY QUEENETH HILBERT FOR AN ORDER FOR THE ENFORCEMENT OF HER FUNDAMENTAL RIGHTS PURSUANT TO SECTIONS 34, 35, 39, 41 AND 46 OF THE CONSTITUTION OF THE FEDERAL REPUBLIC OF NIGERIA 1999 AS AMENDED AND THE AFRICAN CHARTER ON HUMAN AND PEOPLES'S RIGHTS**

**IN THE MATTER OF**

**QUEENETH HILBERT**

**..... APPLICANT**

**AND**

- 1. INSPECTOR GENERAL OF POLICE**
- 2. DESTINY ETIKO**

**} RESPONDENTS**

**NOTICE OF APPLICATION FOR ORDER ENFORCING THE FUNDAMENTAL RIGHTS OF THE APPLICANT**

**TAKE NOTICE** that the Federal High Court, Ikoyi, Lagos will be moved on the ..... day of ..... **2025** or so soon thereafter as Counsel can be heard on behalf of the **APPLICANT** for an order that the **APPLICANT** is entitled to the enforcement of her fundamental rights as prescribed and guaranteed by Sections 34, 35, 39, 41 and 46 of the 1999 Constitution of the Federal Republic of Nigeria as amended in terms of the reliefs sought in the Statement accompanying the affidavit in support of the application.

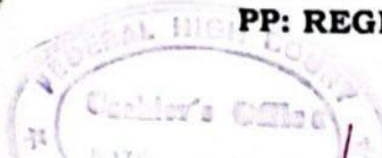
**AND TAKE NOTICE** that on the hearing of this application the said Applicant will rely on the Affidavit in support of the application the statement of facts as well as the written address.

**DATED THIS 10<sup>th</sup> DAY OF MARCH 2025**



*[Handwritten Signature]*

**EBINIMI BEREDUGO**  
**OMO-ELO JOMARU AKOKAIKE ✓**  
**ELIZABETH ADEOLA AYANBANJO**  
**PP: REGENCY LAW FIRM**



**APPLICANT'S COUNSEL**  
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+234(0)9115002003

**FOR SERVICE ON:**

1. 1<sup>ST</sup> RESPONDENT  
THE INSPECTOR-GENERAL OF POLICE  
NIGERIA POLICE HEADQUATERS ANNEX  
KAM SELEM HOUSE  
MONONEY STREET  
OBALENDE  
LAGOS.
2. 2<sup>ND</sup> RESPONDENT  
C/O HER COUNSEL  
NWABUNDO & ASSOCIATES  
NO. 28, TRANSIT 2,  
ADETOKUNBO ADEMOLA STREET  
VICTORIA ISLAND  
LAGOS STATE.

An application [REDACTED]

Notice of application [REDACTED]

Order [REDACTED]

Order [REDACTED]

Exhibit [REDACTED]

Filing [REDACTED]

Service [REDACTED]

W/ [REDACTED]

Affidavit [REDACTED]

Urgency [REDACTED]



10-3-2025  
11:53am

Filed [Signature]

**IN THE FEDERAL HIGH COURT**  
**IN THE LAGOS JUDICIAL DIVISION**  
**HOLDEN AT LAGOS**

FAK/14/CS/453/25

SUIT NO:

**IN THE MATTER OF AN APPLICATION BY QUEENETH HILBERT FOR AN ORDER FOR THE ENFORCEMENT OF HER FUNDAMENTAL RIGHTS PURSUANT TO SECTIONS 34, 35, 39, 41 AND 46 OF THE CONSTITUTION OF THE FEDERAL REPUBLIC OF NIGERIA 1999 AS AMENDED AND THE AFRICAN CHARTER ON HUMAN AND PEOPLES'S RIGHTS**

**IN THE MATTER OF**

**QUEENETH HILBERT ..... APPLICANT**

**AND**

- 1. INSPECTOR GENERAL OF POLICE**
  - 2. DESTINY ETIKO**
- } RESPONDENTS**

**NAME AND DESCRIPTION OF THE APPLICANT:**

The Applicant **QUEENETH HILBERT** of Ujunwa Anumbe Akunne Street, Asaba, Delta State.

**NAME AND DESCRIPTION OF THE RESPONDENT:**

- 1. The 1<sup>st</sup> Respondent is the Inspector-General of Police in Nigeria with overall control of all Police Officers in the Federal Republic of Nigeria and has its Lagos Headquarters Annex office at Kam Selem House, Moloney Street, Obalende, Lagos.
- 2. While the 2<sup>nd</sup> Respondent is an Actress and her only address known to the Applicant is her Solicitors' Address at No. 2 [Redacted] Victoria Island, Lagos State.

**RELIEFS SOUGHT**

- 1. **A DECLARATION** that the attempt to arrest and deprived the Applicant of her personal liberty and freedom of movement on the **8<sup>th</sup> day of March 2025** by Police officers under the control and command of the 1<sup>st</sup> Respondents is illegal, unlawful and a flagrant violation of the right to personal liberty of the Applicant as provided under Section 35 (1) and 41 of the 1999 Constitution.

2. A Declaration that the attempts to arrest the Applicant by Police officers under the control and command of the 1<sup>st</sup> Respondent which is overtly instigated by the 2<sup>nd</sup> Respondent is unlawful, illegal and a clear violation of the Applicant's right to personal liberty under Section 35 and 41 of the 1999 Constitution as amended.
3. The sum of **N100, 000,000.00k (One Hundred Million Naira)** as damages for the unlawful invasion, the Applicant's inability move freely and conduct her businesses and attempts to arrest the Applicant by the officers of the 1<sup>st</sup> Respondent acting at the behest and instance of the 2<sup>nd</sup> Respondent.
4. An Order of perpetual injunction restraining all police officers under the control and command of the 1<sup>st</sup> Respondent from arresting, interrogating and detaining the Applicant in respect of the statement made by the Applicant in her Instagram handle on the 7<sup>th</sup> day of March 2025 pending the determination of this suit.
5. An Order of perpetual injunction restraining all police officers under the control and command of the 1<sup>st</sup> Respondent or any Commissioner of Police of any states of the federation or any other Law Enforcement Agency from arresting, interrogating and detaining the Applicant in respect of the statement made against the 2<sup>nd</sup> Respondent on her Instagram handle.

#### **GROUND'S UPON WHICH THE RELIEFS ARE SOUGHT**

1. The attempt to arrest and detain the Applicant under the directive of the officers of the 1<sup>st</sup> Respondent is illegal, unlawful and a flagrant violation of the right to personal liberty, freedom of expression and right to freedom of movement of the Applicant as provided under Section 35 (1), 39 and 41 of the 1999 Constitution respectively.
2. The invasion of the Applicant home by Police Officers and the threat to forcefully charge the Applicant to Court over an allegation of cyberbullying by officers under the command and control of the 1<sup>st</sup> Respondent by the instigation of the 2<sup>nd</sup> Respondent is illegal, unlawful and a flagrant violation of the rights to personal liberty, freedom of movement and freedom of speech of the Applicants as provided under Section 35 (1), 39 and 41 of the 1999 Constitution respectively.
3. The intimidation, invasion and harassment unleashed at the Applicant's Home in Asaba by officers of the 1<sup>st</sup> Respondent is a

gross violation of her right to dignity of life as provided in Section 34 of the 1999 Constitution.

### **FACTS RELIED ON BY THE APPLICANT**

1. The Applicant works in the entertainment industry and resides at Asaba, Delta State.
2. The 1<sup>st</sup> Respondent is the Inspector-General of Police in Nigeria with overall control of all Police Officers in the Federal Republic of Nigeria and has his Lagos Headquarters Annex office is at Kam Selem House, Moloney Street, Obalende, Lagos.
3. The 2<sup>nd</sup> Respondent is an Actress and her only address known to the Applicant is her Solicitors Address at No. [REDACTED] Address [REDACTED] Victoria Island, Lagos State [REDACTED]
4. Sometimes in February 2020, the Applicant's erstwhile fiancé Mr. Tony Ujiagbedion, visited her during the production of a movie at Olive Gate Hotel, Enugu, Enugu State where she was shooting an African movie alongside with the 2<sup>nd</sup> Respondent.
4. The Applicant consciously introduced Mr. Tony Ujiagbedion to all the crewmembers including the 2<sup>nd</sup> Respondent as her husband-to-be in a bid to ward-off intruders as it is prevalent amongst ladies in the movie industry to double-cross their fellow colleagues' fiancé or husband for monetary gratification.
5. Due to the sudden visit of the Applicant's fiancé, she was very cautious at the movie location to avoid a situation whereby the notorious Husband snatchers amongst them would not have access to her fiancé by asking for his telephone number.
6. Surprisingly, the 2<sup>nd</sup> Respondent shamelessly approached the Applicant's fiancé Mr. Tony Ujiagbedion and requested for his telephone number. This action of the 2<sup>nd</sup> Respondent infuriated the Applicant and she confronted her fiancé who then confessed that it was the 2<sup>nd</sup> Respondent that demanded for his telephone number.
7. The Applicant did not create any scene at the movie location in that she felt her fiancé would not have anything whatsoever to do with the 2<sup>nd</sup> Respondent since she had challenged him at the Movie location same day.
8. Regrettably, the 2<sup>nd</sup> Respondent whom is well aware that Mr. Tony Ujiagbedion is the Applicant's husband-to-be as they were already engaged to the knowledge of the 2<sup>nd</sup> Respondent, still went behind

the Applicant to visit her fiancé at his hotel room and upon confronting her fiancé for a second time, he admitted that it was the same 2<sup>nd</sup> Respondent that co-opted him to invite her in that she feigned she needed financial help.

9. Instantly, the Applicant notified her family that all engagement and introduction already done by her fiancé be cancelled, as she could not cope with the treachery committed against her by the duo of Mr. Tony Ujiagbedion and the 2<sup>nd</sup> Respondent whom she thought was a companionable colleague.
10. Following the foregoing incident, the Applicant disengaged with Mr. Tony Ujiagbedion and strictly faced her movie career without having anything to do with the 2<sup>nd</sup> Respondent as her insalubrious actions smack of outright betrayal.
11. Sometimes in 2024, the Applicant decided to have an affectionate relationship with a bosom friend of her by the name Mr. Izuchukwu Callistus, however, midway into their relationship, this same 2<sup>nd</sup> Respondent find her way to Mr. Izuchukwu Callistus and persuaded him to lend her the sum of **N15,000,000.00k (Fifteen Million Naira)**.
12. As soon as the Applicant became aware of the unwarranted friendly loan, and to avoid a repeat of what led to the break-up of her former relationship with Mr. Tony Ujiagbedion, she prevailed on Mr. Izuchukwu Callistus to recover his money and cut-off any form of ties with the 2<sup>nd</sup> Respondent in that it has now become very copious to even the blind that the 2<sup>nd</sup> Respondent has developed an envious habit against the Applicant's personal life.
13. The Applicant handled the above two incidents wisely by reporting to those who are closer to both of them in the movie industry and the 2<sup>nd</sup> Respondent in a bid to caution her to refrain from the distasteful actions she had exhibited towards her previous nascent relationships nevertheless, the 2<sup>nd</sup> Respondent remained unapologetic till date.
14. In recent times, the 2<sup>nd</sup> Respondent connived with a Blogger who trades by the name "Ajemba Stanley Chibueze (@stanley\_ontop)" on Instagram, wherein this blogger maligned the Applicant's reputation contending that the Applicant is a drug addict thereby causing the Applicant to lose some very exciting endorsement deals.
15. Upon a detailed investigation, the Applicant found out that the 2<sup>nd</sup> Respondent is the architect of all the deleterious publication being

made against her by the so called "Ajemba Stanley Chibueze (@stanley\_ontop) on Instagram and at the heat of the provocation, she was compelled to cry out through her Instagram handle and used the same medium to warn the 2<sup>nd</sup> Respondent to stop trailing and stalking person (s) who are closely connected to her.

16. Subsequent to the video made by the Applicant on her Instagram handle, the Applicant received a letter dated the 8<sup>th</sup> day of March 2025, and which was published on various Social Media Platforms by the Counsel to the 2<sup>nd</sup> Respondent, cautioning me to cease and desist from making any assertion against the 2<sup>nd</sup> Respondent.
17. On the same 8<sup>th</sup> day of March 2025, the Applicant received a call from a hidden telephone number from a Police Officer who claimed to be addressed as **Superintendent Paul** by name and starkly stated that the 1<sup>st</sup> Respondent has directed him to invite her to Abuja on the 11<sup>th</sup> day of March 2025 at the office of the Inspector General of Police, Monitoring Unit, in respect of a case of Cyberbullying, levelled against the Applicant by the 2<sup>nd</sup> Respondent.
18. The Applicant swiftly requested the said Police Officer to forward a proper invitation letter so that she could ascertain the invitation is emanating from the Nigeria Police to avert any unlawful infractions of her right to personal liberty as well as the right to freedom of expression.
19. In the twilight of the 8<sup>th</sup> day of March 2025, three brutally looking Police Officers, heavily armed with dangerous weapons, stormed the Applicant home in Asaba of Delta State with the intention to arrest and deprive the Applicant of her right to personal liberty as guaranteed by the Constitution of the Federal Republic of Nigeria but luckily, the Applicant was in a neighboring compound watching them welding the dangerous weapon in front of her gate as she got a tip-off from a close friend to stay clear from home.
20. From the 8<sup>th</sup> day of March 2025 till the 10<sup>th</sup> day of March 2025, the Applicant has received avalanche of threats to her right to dignity of life, personal liberty, freedom of movement and freedom of expression by Police officers under the command and control of the 1<sup>st</sup> Respondent, acting under the behest of the 2<sup>nd</sup> Respondent to arrest and detain the Applicant at the 1<sup>st</sup> Respondent's detention facility at Abuja, over an alleged case of libel, which is purely a tortious liability that has no criminal coloration.
21. Besides, the Applicant received a very threatening direct message on her Instagram handle from a patriotic Nigerian, warning the

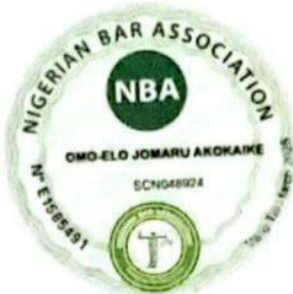
Applicant to stay away from all movie shoots, she supposed to carry out from the 11<sup>th</sup> day of March 2025 till the end of March 2025, until the Applicant is able to secure the protection of the Honourable Court to safeguard her inalienable right to personal liberty and freedom of expression, if not the officers of the 1<sup>st</sup> Respondent are likely to be trampled upon the Applicants fundamental rights.

22. The Applicant is well aware that if the Honourable Court does not wade into this case and restrained the Respondents, her right to dignity of life, right to freedom of movement, freedom of speech and personal liberty shall be trampled upon just because the Applicant expressed the harrowing anguish caused to her by the 2<sup>nd</sup> Respondent.
23. The attempts by the officers of the 1<sup>st</sup> Respondent to arrest and detain the Applicant at the behest and instance of the 2<sup>nd</sup> Respondent is a flagrant violation of the Applicant's constitutional right to personal liberty and the right to freedom of expression.
24. The Applicant hereby states that she has stopped to carry on with her movie business since the attempts by police officers under the command of the 1<sup>st</sup> Respondent have unjustly displayed their resolve to arrest the Applicant, for the sole reason that she honestly expressed the pain and distress caused to her by the 2<sup>nd</sup> Respondent.
25. Due to the palpable fear of being unfairly arrested and detained by the Officers of the 1<sup>st</sup> Respondents, the Applicant has incurred humongous loss, lost all anticipated income from her movie business slated from the 11<sup>th</sup> of March 2025 till the 31<sup>st</sup> day of March 2025 as well as damages.
26. The Applicant has also been traumatized by the displayed of brigandage by the fiercely looking Police officers of the 1<sup>st</sup> Respondent, who dressed in hood and stormed her home in a bid to publicize the Applicant's arrest and molest her at the instigation of the 2<sup>nd</sup> Respondent in order to brandish the Applicant as a common criminal in the movie industry.
27. The Officers of the 1<sup>st</sup> Respondent attempted to break down the gate leading to the Applicant's house when they could not gain access to her house but with the timely intervention of passers-by they were prevailed upon to stop the destruction of the Applicant's property.



- 10
28. As a law-abiding citizen, the Applicant is ready to justify the statement made against the 2<sup>nd</sup> Respondent in a competent court of law since the 2<sup>nd</sup> Respondent's Counsel had served the Applicant a letter to that effect.
  29. It is traumatic to state that out of the fear that the officers of the 1<sup>st</sup> Respondent might likely break into the Applicant's house whenever they return, as they left a message for her Security Guard that if the Applicant fails to report at Abuja on the 11<sup>th</sup> day of March 2025 they will ransack her home and track her to anywhere in Nigeria, made the Applicant to flee to Lagos State to seek refuge.
  30. Hence, the Applicant humbly entreat the Honourable Court to ensure her right to personal liberty and freedom of expression are not contravened in that the 2<sup>nd</sup> Respondent is determined on instigating Police Officers under the command and control of the 1<sup>st</sup> Respondent to arrest and detain the Applicant in order to show to the world, her self-acclaimed connection with the Nigeria Police.

DATED THIS 15<sup>TH</sup> DAY OF MARCH 2025



*[Handwritten signature]*

EBINIMI BEREDUGO  
OMO-ELO JOMARU AKOKAIKE ✓  
ELIZABETH ADEOLA AYANBANJO  
PP: **REGENCY LAW FIRM**  
**APPLICANT'S COUNSEL**

10B, OLUFUNMILOLA OKIKIOLU STREET  
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[regencylawfirm@rocketmail.com](mailto:regencylawfirm@rocketmail.com)  
+234(0)9115002003

**FOR SERVICE ON:**

1. 1<sup>ST</sup> RESPONDENT  
THE INSPECTOR-GENERAL OF POLICE  
NIGERIA POLICE HEADQUATERS ANNEX  
KAM SELEM HOUSE  
MONONEY STREET  
OBALENDE, LAGOS.
2. 2<sup>ND</sup> RESPONDENT  
C/O HER COUNSEL  
NWABUNDO & ASSOCIATES  
NO. 28, TRANSIT 2,  
ADETOKUNBO ADEMOLA STREET  
VICTORIA ISLAND, LAGOS STATE.

*[Circular stamp: HIGH COURT, LAGOS, JUDGE'S OFFICE]*  
10/3/25

- 26. I have also been traumatized by the displayed of brigandage by the fiercely looking Police officers of the 1<sup>st</sup> Respondent, who stormed my home in a bid to publicize my arrest and molest me at the instigation of the 2<sup>nd</sup> Respondent in order to brandish me as a common criminal in the movie industry.
- 27. The Officers of the 1<sup>st</sup> Respondent attempted to break down the gate leading to my house when they could not gain access to my house but with the timely intervention of passers-by they were prevailed upon to stop the destruction of my property.
- 28. As a law-abiding citizen, I am ready to justify the statement made against the 2<sup>nd</sup> Respondent in a competent court of law since the 2<sup>nd</sup> Respondent's Counsel had served me a letter to that effect.
- 29. It is traumatic to state that out of the fear that the officers of the 1<sup>st</sup> Respondent might likely break into my house whenever they return, as they left a message for my Security Guard that if I fail to report at Abuja they will ransack my home, I fled to Lagos State to seek refuge.
- 30. Hence, I humbly entreat the Honourable Court to ensure my right to personal liberty and freedom of expression are not contravened in that the 2<sup>nd</sup> Respondent is determined on instigating Police Officers under the command and control of the 1<sup>st</sup> Respondent to arrest and detain me in order to show to the world, her self - acclaimed connection with the Nigeria Police.
- 31. I declare that all the facts contained in the Statement of facts filed in support of this application which facts are deposed to by me in good faith and in accordance of Oaths Act.


  
 .....  
**DEPONENT**

**SWORN TO AT THE FEDERAL HIGH COURT  
 IKOYI, LAGOS**

THIS 10<sup>th</sup> DAY OF March ..... 2025

**BEFORE ME**

  
**COMMISSIONER OF OATHS**  
**J O AGBO (MR.)**  
**COMMISSIONER FOR OATHS**  
**FEDERAL HIGH COURT**  
**IKOYI, LAGOS**

  
 10/3/15

10/13-2023  
11:52am

**IN THE FEDERAL HIGH COURT  
IN THE LAGOS JUDICIAL DIVISION  
HOLDEN AT LAGOS**

FEDERAL HIGH COURT  
IKOYI, LAGOS



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**IN THE MATTER OF AN APPLICATION BY QUEENETH HILBERT  
FOR AN ORDER FOR THE ENFORCEMENT OF HER FUNDAMENTAL  
RIGHTS PURSUANT TO SECTIONS 34, 35, 39, 41 AND 46 OF THE  
CONSTITUTION OF THE FEDERAL REPUBLIC OF NIGERIA 1999 AS  
AMENDED AND THE AFRICAN CHARTER ON HUMAN AND  
PEOPLES'S RIGHTS**

11

**IN THE MATTER OF**

**QUEENETH HILBERT**

..... **APPLICANT**

**AND**

- 1. **INSPECTOR GENERAL OF POLICE**
- 2. **DESTINY ETIKO**

} **RESPONDENTS**

**AFFIDAVIT IN SUPPORT OF THE APPLICATION UNDER ORDER 2  
RULE 3 OF THE FUNDAMENTAL RIGHTS (ENFORCEMENT  
PROCEDURE) RULES 2009**

I, **QUEENETH HILBERT** of [Redacted]  
Delta State, Female, an Actress and Christian do hereby make Oath and  
state as follows that:

- 1. I am the Applicant and I am conversant with the facts deposed to in this affidavit unless otherwise stated.
- 2. I reside at Asaba, Delta State.
- 3. Sometimes in February 2020, my erstwhile fiancé Mr. Tony Ujiagbedion, visited me during the production of a movie at Olive Gate Hotel, Enugu, Enugu State where I was shooting a movie alongside with the 2<sup>nd</sup> Respondent.

4. I purposefully introduced Mr. Tony Ujiagbedion to all the crewmembers including the 2<sup>nd</sup> Respondent as my husband-to-be in a bid to ward-off intruders as it is now pervasive amongst ladies in the movie industry to double-cross their fellow colleagues' fiancé or husband for monetary gains.
5. Due to the sudden visit of my fiancé, I became very cautious at the movie location to avoid a situation whereby the notorious Husband snatchers amongst us at the movie location would not have access to my fiancé by asking for his telephone number.
6. Astoundingly, the 2<sup>nd</sup> Respondent approached my fiancé Mr. Tony Ujiagbedion and requested for his telephone number. This brazen act of the 2<sup>nd</sup> Respondent infuriated me and I immediately confronted my fiancé who then informed me that it was the 2<sup>nd</sup> Respondent that demanded for his telephone number.
7. I did not create any scene at the movie location in that I felt my fiancé would not have anything whatsoever to do with the 2<sup>nd</sup> Respondent since I had challenged him at the Movie location same day.
8. Regrettably, the 2<sup>nd</sup> Respondent whom is well aware that Mr. Tony Ujiagbedion is my husband-to-be as we were already engaged to the knowledge of the 2<sup>nd</sup> Respondent, went behind me to visit my fiancé at his hotel and upon challenging my fiancé yet again, he admitted that it was the same 2<sup>nd</sup> Respondent that co-opted him to invite her in that she feigned she needed financial assistance.
9. Instantly, I spoke to my family that all engagement and introduction already done by my fiancé should be annulled, as I could not cope with the treachery committed against me by my fiancé with the connivance of the 2<sup>nd</sup> Respondent whom I thought was a companionable colleague.
10. Consequent upon the foregoing incident, I disengaged with my fiancé Mr. Tony Ujiagbedion and faced my movie career without having anything to do with the 2<sup>nd</sup> Respondent as her actions smack of outright betrayal.
11. Sometimes in 2024, I decided to have an [REDACTED] with a close friend of mine by the name Mr. Izuchukwu Callistus but midway into our relationship, this same 2<sup>nd</sup> Respondent find her way to Mr. Izuchukwu Callistus and persuaded him to lend her the sum of **N15,000,000.00k (Fifteen Million Naira)**.
12. As soon as I became aware of the unwarranted friendly loan, and to avoid a repeat of what led to the break-up of my former

relationship with Mr. Tony Ujiagbedion, I prevailed on Mr. Izuchukwu Callistus to recover his money and sever any form of relationship with the 2<sup>nd</sup> Respondent in that it has now become very copious to even the blind that the 2<sup>nd</sup> Respondent has developed an envious habit against my personal life.

- 13. I handled the above two incidents maturely by reporting to those who are closer to me and the 2<sup>nd</sup> Respondent in a bid to caution her to refrain from the distasteful actions she had exhibited towards my previous nascent relationships but she had remained unapologetic till date.
- 14. Recently, the 2<sup>nd</sup> Respondent connived with a Blogger who trades by the name "Ajemba Stanley Chibueze (@stanley\_ontop) on Instagram, where this blogger malign my reputation by accusing me of drug peddling thereby making me to lose some very exciting endorsement deals.
- 15. Upon a detailed investigation, I found out that the 2<sup>nd</sup> Respondent is the architect of all the negative publication made against me by the so called "Ajemba Stanley Chibueze (@stanley\_ontop) on Instagram and at the heat of the provocation, I was compelled to cry out through my Instagram handle and warned the 2<sup>nd</sup> Respondent to stop trailing and stalking person (s) who are closely connected to me.
- 16. Subsequent to the video I made on Instagram, I received a letter dated the 8<sup>th</sup> day of March 2025, addressed to me and published on various Social Media Platforms by the Counsel to the 2<sup>nd</sup> Respondent, warning me to cease and desist from making any further assertion against the 2<sup>nd</sup> Respondent. A copy of the letter is hereby attached as **Exhibit Q1**.
- 17. On the same 8<sup>th</sup> day of March 2025, I received a call from a hidden telephone number from a Police Officer who claimed to be **Superintendent Paul** by name and starkly stated that the 1<sup>st</sup> Respondent has directed him to invite me to Abuja, on the 11<sup>th</sup> day of March 2025, at the office of the Inspector General of Police Monitoring Unit in respect of a case of Cyberbullying levelled against me by the 2<sup>nd</sup> Respondent.
- 18. I quickly requested the said Police Officer to forward a proper invitation letter so that one can be sure the invitation is emanating from the Nigeria Police to avert any unlawful infractions of my right to personal liberty as well as my right to freedom of expression.

19. In the twilight of the 8<sup>th</sup> day of March 2025, three brutally looking Police Officers, heavily armed with dangerous weapons, wearing hood, stormed my home in Asaba, Delta State with the intention to arrest and deprive me of my right to personal liberty as guaranteed by the Constitution of the Federal Republic of Nigeria but providentially, I was in a neighbor's compound watching them welding the dangerous weapon in front of my gate as I got a tip-off from a close friend of mine.
20. From the 8<sup>th</sup> day of March 2025 till the 10<sup>th</sup> day of March 2025, I have received avalanche of threats to my right to dignity of human person, personal liberty, freedom of movement and freedom of expression by Police officers under the command and control of the 1<sup>st</sup> Respondent, acting under the behest of the 2<sup>nd</sup> Respondent in order to arrest and detain me at the 1<sup>st</sup> Respondent's detention facility at Abuja, over an alleged case of libel, which is purely a tortious liability that has no criminal coloration.
21. Besides, I received a very threatening direct message (dm) on my Instagram handle on the 10<sup>th</sup> day of March 2025 from a patriotic Nigerian, warning me to stay away from all movie productions around delta state and its environs or any job I supposed to carry out from the 11<sup>th</sup> day of March 2025 till the end of March 2025, until I am able to secure the protection of the Honourable Court to safeguard my inalienable right to personal liberty and freedom of expression, in that the officers of the 1<sup>st</sup> Respondent are bent on trampling upon my fundamental rights.
22. I am well aware that if the Honourable Court does not wade into this to invade my inalienable rights as provided in chapter four of the Constitution restraining the Respondents, my right to the dignity of human person, right to movement, freedom of speech and personal liberty shall be trampled upon just because I expressed the anguish caused to me by the 2<sup>nd</sup> Respondent.
23. The attempts by the officers of the 1<sup>st</sup> Respondent to arrest and detain me at the bidding and instance of the 2<sup>nd</sup> Respondent is a gross violation of my constitutional right to personal liberty and the right to freedom of expression.
24. I have stopped to carry out my movie business since the attempts by police officers under the command of the 1<sup>st</sup> Respondent to unjustly arrest me for the sole reason that I expressed the pain and distress caused to me by the 2<sup>nd</sup> Respondent.
25. Due to the palpable fear of being unfairly arrested and detained by the Officers of the 1<sup>st</sup> Respondent, I have incurred humongous loss, great loss of anticipated income from my movie business slated from the 11<sup>th</sup> of March till the 31<sup>st</sup> of March 2025 and

- 26. I have also been traumatized by the displayed of brigandage by the fiercely looking Police officers of the 1<sup>st</sup> Respondent, who stormed my home in a bid to publicize my arrest and molest me at the instigation of the 2<sup>nd</sup> Respondent in order to brandish me as a common criminal in the movie industry.
- 27. The Officers of the 1<sup>st</sup> Respondent attempted to break down the gate leading to my house when they could not gain access to my house but with the timely intervention of passers-by they were prevailed upon to stop the destruction of my property.
- 28. As a law-abiding citizen, I am ready to justify the statement made against the 2<sup>nd</sup> Respondent in a competent court of law since the 2<sup>nd</sup> Respondent's Counsel had served me a letter to that effect.
- 29. It is traumatic to state that out of the fear that the officers of the 1<sup>st</sup> Respondent might likely break into my house whenever they return, as they left a message for my Security Guard that if I fail to report at Abuja they will ransack my home, I fled to Lagos State to seek refuge.
- 30. Hence, I humbly entreat the Honourable Court to ensure my right to personal liberty and freedom of expression are not contravened in that the 2<sup>nd</sup> Respondent is determined on instigating Police Officers under the command and control of the 1<sup>st</sup> Respondent to arrest and detain me in order to show to the world, her self - acclaimed connection with the Nigeria Police.
- 31. I declare that all the facts contained in the Statement of facts filed in support of this application which facts are deposed to by me in good faith and in accordance of Oaths Act.


  
 .....  
**DEPONENT**

**SWORN TO AT THE FEDERAL HIGH COURT  
 IKOYI, LAGOS**

THIS 10<sup>th</sup> DAY OF March ..... 2025

**BEFORE ME**

  
**COMMISSIONER OF OATHS**  
**J O AGBO (MR.)**  
**COMMISSIONER FOR OATHS**  
**FEDERAL HIGH COURT**  
**IKOYI, LAGOS**

  
 Callers's Office  
 10/3/15  
 LAGOS

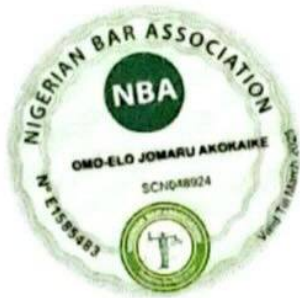
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arbitrary act grossly violated the legal right of the Applicant as guaranteed by Section 34, 35, 39 and 41 of the 1999 Constitution of the Federal Republic of Nigeria.

We further submit that the Applicant is entitled to the sum of **N100, 000,000.00k (One Hundred Million Naira)** being claimed as compensation.

- 2.29 We urge this Honourable Court to grant the Applicant's application for the enforcement of her fundamental rights as stated in the reliefs sought in the Statement attached to the application.

**DATED THIS 10<sup>TH</sup> DAY OF MARCH 2025**



  
EBINIMI BEREDUGO  
OMO-ELO JOMARU AKOKAIKE ✓  
ELIZABETH ADEOLA AYANBANJO  
**PP: REGENCY LAW FIRM**  
**APPLICANT'S COUNSEL**  
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**FOR SERVICE ON:**

1. 1<sup>ST</sup> RESPONDENT  
THE INSPECTOR-GENERAL OF POLICE  
NIGERIA POLICE HEADQUATERS ANNEX  
KAM SELEM HOUSE  
MONONEY STREET  
OBALENDE  
LAGOS.
  
2. 2<sup>ND</sup> RESPONDENT  
C/O HER COUNSEL  
NWABUNDO & ASSOCIATES  
NO. 28, TRANSIT 2,  
ADETOKUNBO ADEMOLA STREET  
VICTORIA ISLAND  
LAGOS STATE.

