



Mike Ozekhome's Chambers

Legal Practitioners and Notaries Public

HEAD CHAMBERS, ABUJA (FCT):

UKWE COURT: Plot 2215, Cadastral Zone, Nile Street, Opposite Maitama Divisional Police Station, Maitama, Abuja, FCT. Tel: 08182728782; 08035550444; 08022266688; 08094777755; 08098898888; 08129444555; 09055553368.

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31ST July, 2023

The Chairman,
Code of Conduct Bureau (CCB),
5th Floor Federal Secretariat Complex Annex III,
Shehu Shagari Way Maitama,
Abuja, FCT.



Dear sir,

THE LINK BETWEEN INEC, SUPERFLUX INTERNATIONAL LTD,
BALLOT PRINTING AND THE OGUN STATE GOVERNORSHIP
ELECTION: OUR PETITION FOR URGENT INVESTIGATION AND
POSSIBLE PROSECUTION

INTRODUCTION

1. We are Solicitors for Human Rights Writers Association (HURIWA) ("our client"), a non-governmental and non-political organization formed in the 2007, with Certificate No. CA/IT/NO 24712.
2. Amongst others, our client, an internationally recognized NGO, engages in writing and advocacy to promote, protect and project the human rights of all Nigerians and other law abiding citizens resident within Nigeria. It also engages in advocacy for and protection of a credible electoral process, good governance, the rule of law and eradication of corruption from all facets of our electoral life.

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ABOUT SUPERFLUX INTERNATIONAL LTD

3. Our client states that Superflux international Ltd (Superflux) is a Nigerian limited liability private company founded and propelled by Chief Tokunbo Talabi, the current Secretary to the Government of Ogun State (SSG) headed by Dr Dapo Abiodun. Superflux is a leading security printing company duly accredited by the Central BANK OF Nigeria (CBN), Central Bank of Zambia, and other West African Central Banks. With registration No. **275594**, Superflux has its address at **No. 3, Vori Close, Off ACME Road, Ikeja, Lagos.**

BACKGROUND FACTS

4. Our client informed us that Dapo Abiodun's SSG, Tokunbo Talabi, is the president and CEO of Superflux International Ltd; is a trained physiotherapist and banker of many years experience, and holds positions in boards of several companies. Our client informed us that the said Chief Talabi printed Ballot Papers for Independent National Electoral Commission (INEC), using his company, Superflux as the vehicle, during the **March 18, 2023.**
5. Our client informed us that there was much movement of ballot papers during the **March 18, 2023** Governorship elections. Our client states that it was generally believed that while Superflux was printing the originals for INEC contract, it also allegedly printed extra ballots which were later used to undermine the said Ogun State Governorship election in favour of Dapo Abiodun, the sitting Governor.
6. These discrepancies, our client informed us, form part of the ongoing challenge to the governorship outcome before the Election Petition Tribunal sitting in Abeokuta, Ogun State. Our client states that there are many cases of multiple ballot papers with the same serial numbers; whilst there are ballot papers whose serial numbers are at variance with what were deployed in the said Ogun State for the Governorship election. These were also said to have accounted for overvoting in many polling units,



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with alleged ballot box stuffings as the order of the day. Many of those ballot papers were believed by our client to have emanated from Tokunbo Talabi's Superflux company.

FACTS IN SUPPORT OF THESE CLAIMS

7. On the **19th of August, 2020**, INEC paid the sum of **N47, 449,290.90** four times on the same day into Superflux Access Bank account, Victoria Island branch, with the **account number: 0001990557**
8. This sum was allegedly transferred from CBN's INEC Electoral account with the description: **NFT/CBN/BO/INEC Electoral Account/ M2867/PMT 4 SS Ballot P.**
9. Similarly, on the **23rd of June, 2020**, INEC credited another Superflux's corporate account with **Access Bank: 0001598513**, with the sum of **N98, 898581.80**. This sum was said to have been quickly moved to the **first mentioned account No. 0001990557**. The transaction description was the same as above, i.e, **NFT/CBN/BO/INEC Electoral Account/ M2867/PMT 4 SS Ballot P.**
10. Our client maintains that because Tokunbo Talabi is an interested party, being the SSG to Dapo Abiodun (the Governor), who is also an interested party as his election was being challenged, they all compromised the Gubernatorial election with overvoting through his company's printed excess ballot papers.
11. Our client informed us that Tokunbo Talabi's BVN is still attached to the accounts till date; and so cannot claim any prior detachment or resignation from the ownership and Directorship of the said Superflux company that printed the ballot papers.



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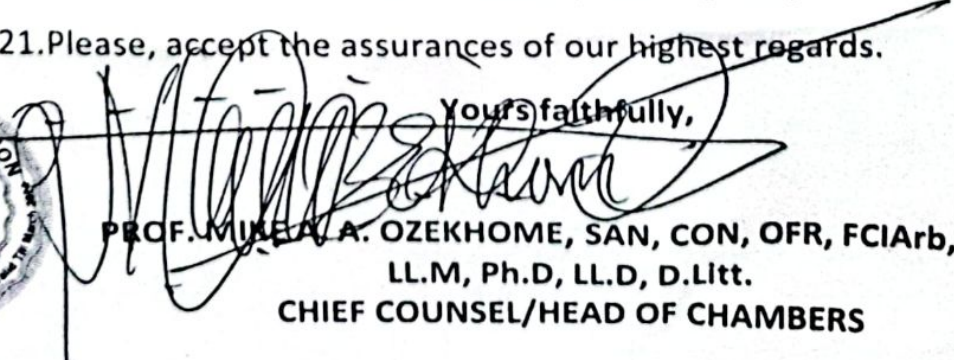
OTHER LINKED ACCOUNTS

12. Other Superflux accounts linked to Tokunbo Talabi which our client insists must be investigated based on Superflux's involvement, are:
 1. Polaris: Allen Avenue branch. **Account Number: 4090893181**
 2. Stambic, Oba Akran Branch: **000487511**
 3. Standard Chartered, Branch 04900: **10000058696**
 4. Sterling Bank, Aromire branch Ikeja: **0003058731**
 5. UBA: **1004322521**
 6. Union Bank, Stallion Plaza branch: **0040353673**
 7. Unity Bank, HQ Office: **12764744.**
13. Our client informed us that barely three months into Governor Dapo Abiodun's administration in 2019, precisely on the **11th of August**, Tokunbo Talabi opened a Superflux International DSRA (Domiciliary account) with Access Bank, Victoria Island branch with **Account Number: 1222529704**, from which many transactions were located.
14. For instance, on the 6th of April, 2020, he allegedly made a singular transaction of seven hundred million naira (**N700m**) into a property company, **Stonestack Limited**.
15. From another **Access Bank** account: **0001598513**, with the Victoria Island branch, Talabi was alleged to have transferred the sum of **\$500,000** to a Logistics company (**Speedwings**) 8 times, amounting to **\$4m (four million dollars)**. Though these transactions were undated, however, some of the last set of the transactions had to do with some **COVID-19** matters which was carried out on the **4th of June, 2020**.
16. Attached herewith and cumulatively marked as **HURIWA 1** are some of the bank transactions above referred to, for your perusal and necessary action.

OUR HUMBLE PRAYERS

17. We believe that the above allegations by our client are weighty enough to merit your urgent attention. There is the need for thorough investigation and possible prosecution, where necessary, as the allegations if found true, have greatly undermined the 2023 Ogun State Governorship election and our electoral process. All these constitute a subversion of the 1999 Constitution of Nigerian, other extant laws, our National ethos and the code of conduct that governs public officers in Nigeria.
18. We therefore demand on behalf of our client, immediate investigation and possible prosecution of the said Chief Tokunbo Talabi; and Superflux International Ltd. You owe this to our client and to Nigerians as the agency Established under the Code of Conduct Bureau and Tribunal Act, Cap 58, LFN, 1990, to establish and maintain a high standard of public morality in the conduct of government business, and to ensure that the actions and behavior of public officers conform to the highest standards of public morality, to carry out this your public duty. We believe that **seven (7) days** from the date of this letter are sufficient to carry out this your statutory function.
19. **TAKE NOTICE** that if you fail, refuse and/or neglect to accede to our above modest demands, we shall be left with no option than to approach a court of competent jurisdiction through an order of **Mandamus** to compel you to carry out your statutory functions.
20. We believe you will act timeously and urgently.
21. Please, accept the assurances of our highest regards.

Yours faithfully,


**PROF. MIKE A. OZEKHOME, SAN, CON, OFR, FCI Arb, LL.B,
LL.M, Ph.D, LL.D, D.Litt.
CHIEF COUNSEL/HEAD OF CHAMBERS**



ANNEXURE HURINWA 1

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	E	F	G
1	ACTION Y	SACTION AMC	TRANSACTION DESCRIPTION
2	2020	47,449,290.90	NFT/CBN B/O /INEC Electoral account/M287 PMT 4 SS OF BALLOT P
3	2020	47,449,290.90	NFT/CBN B/O /INEC Electoral account/M2867PMT 4 SS OF BALLOT P
4	2020	47,449,290.90	NFT/CBN B/O /INEC Electoral account/M287 PMT 4 SS OF BALLOT P
5	2020	47,449,290.90	NFT/CBN B/O /INEC Electoral account/M2867PMT 4 SS OF BALLOT P
6	2020	700,000,000.00	SUPERFLUX INTL IFO STONESTACK LTD
7	2020	13,365,523.26	payment for the supply of POS Rolls Q1
8	2020	13,365,523.26	payment for the supply of POS Rolls Q1
9	2020	38,000,000.00	PP_COURIERPLU/BAL FROM LOAN/ACB /SUPERFLUX INTERNATIONAL LTD
10	2020	38,000,000.00	PP_COURIERPLU/BAL FROM LOAN/ACB /SUPERFLUX INTERNATIONAL LTD
11	2020	10,800,000.00	PP_Covid-19 food support/UBA /ZIMANEL GLOBAL ENTERPRISES
12	2020	10,800,000.00	PP_Covid-19 food support/UBA /ZIMANEL GLOBAL ENTERPRISES
13	2020	20,000,000.00	PP_SUPERFLUX/Covid-19 support/ACR /OGI N STATE COALITION AGAINST COVID



Query1 ▼





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	E	F	G
1	SACTION Y	SACTION AMC	TRANSACTION DESCRIPTION
2	2020	47,449,290.90	NFT/CBN B/O /INEC Electoral account/M287 PMT 4 SS OF BALLOT P
3	2020	47,449,290.90	NFT/CBN B/O /INEC Electoral account/M2867PMT 4 SS OF BALLOT P
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2	2020	47,449,290.90	NFT/CBN B/O /INEC Electoral account/M287 PMT 4 SS OF BALLOT P
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13	2020	20,000,000.00	PP_SUPERFLUX/Covid-19 support/ACB /OGI N STATE COALITION AGAINST COMI

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ACTION	AMC	TRANSACTION DESCRIPTION
47,449,290.90	NFT/CBN B/O /INEC	Electoral account/M287 PMT 4 SS OF BAL
47,449,290.90	NFT/CBN B/O /INEC	Electoral account/M2867PMT 4 SS OF BA
47,449,290.90	NFT/CBN B/O /INEC	Electoral account/M287 PMT 4 SS OF BAL
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10,800,000.00	PP_Covid-19 food support/UBA	/ZIMANEL GLOBAL ENTERPRIS
20,000,000.00	PP_SUPERFLUX/Covid-19 support/ACB	/OGI IN STATE COALIT