

**FORM 01**  
**STATEMENT OF COMPLIANCE WITH PRE ACTION PROTOCOL**  
**(Order 5 Rule 1 (2) (e))**

**IN THE HIGH COURT OF LAGOS STATE**  
**IN THE LAGOS JUDICIAL DIVISION**  
**HOLDEN AT LAGOS**

SUIT NO: LD/7330GCmw/a

BETWEEN:

MR OLADAPO APARA ..... CLAIMANT  
(Trading under the name and style  
Infiniti Systems Enterprises)

AND

1. ALPHA-BETA CONSULTING LLP  
2. SENATOR BOLA AHMED TINUBU ..... DEFENDANTS  
3. MR. AKIN DOHERTY

I, Tade Ipadeola, solicitor to the Claimant hereby make oath and say as follows:

1. The Claimant has complied with the directions of the Pre-Action Protocol as set out in the preamble to the High Court Rules.
2. The Claimant has made attempts to have this matter settled out of court with the Defendant and such attempts were unsuccessful. The Claimant caused his lawyers to write the defendants several letters from 31st July 2018 to 21st September 2020 and Defendants refused or neglected to respond.
3. The Claimant has by a written Memorandum to the Defendant set out his claim and option for settlement to the Defendant.

Dated at Lagos this 2nd day of October 2020

.....  
Signature



BEFORE ME

COMMISSIONER FOR OATHS



31<sup>st</sup> July 2018

Mr. Tunde Badejo,  
Ebo Consult,  
Water Corporation House,  
Ijora,  
Lagos.

Dear Sir,

ALPHA-BETA CONSULTING LLP PARTNERSHIP AGREEMENT -  
NOTICE OF APPOINTMENT OF ARBITRATOR


We are Legal Practitioners to Infiniti Systems Enterprises.

Reference the Partnership Agreement with respect to Alpha-Beta Consulting LLP.

Pursuant to clause 36 of the Partnership Agreement aforesaid, our client has expressed its desire to activate the Arbitration provision for the appointment of a single Arbitrator following the dispute and questions arising from the aforesaid agreement particularly the non-payment of adjudged profit due to our client from 2010 to date despite the billions of Naira profit the firm earned during the period.

Take Notice that if on the expiration of five (5) days inclusive of the date of service on you of this letter, you fail and neglect to affirm your willingness to participate in the Arbitration proceedings, it shall be deemed that you are not interested in the Arbitration process and we shall be at liberty to commence an action in the Lagos High Court for payment of our client's own portion of earned profit.

Yours faithfully,

  
VICTOR OBARO.

CC: Infiniti Systems Enterprises

 **Soft Alliance**  
And Resources Limited  
08 AUG 2018  
**RECEIVED**

15b, Idejo Street, Victoria Island, Lagos.

Postal Address: P. O. Box 53015, Falomo, Ikoyi, Lagos.

Tel: 01 -6281 981; Email: [libra@libralawoffice.com](mailto:libra@libralawoffice.com); [www.libralawoffice.com](http://www.libralawoffice.com)

PARTNERS: Mrs. Hairat Ade-Balogun, OON, MCI Arb - Life Bencher, Osahon Idemudia, LL.B. (Hons.), Afolabi Balogun, Dip.Arb, MCI Arb

31<sup>st</sup> July 2018

Mr. Michael Ogunmola,  
Momo Consulting Nigeria,  
14, Folayemi Street,  
Ilupeju,  
Lagos.

Dear Sir,

ALPHA-BETA CONSULTING LLP PARTNERSHIP AGREEMENT -  
NOTICE OF APPOINTMENT OF ARBITRATOR

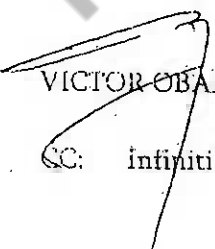
We are Legal Practitioners to Infiniti Systems Enterprises.

Reference the Partnership Agreement with respect to Alpha-Beta Consulting LLP.

Pursuant to clause 36 of the Partnership Agreement aforesaid, our client has expressed its desire to activate the Arbitration provision for the appointment of a single Arbitrator following the dispute and questions arising from the aforesaid agreement particularly the non-payment of adjudged profit due to our client from 2010 to date despite the billions of Naira profit the firm earned during the period.

Take Notice that if on the expiration of five (5) days inclusive of the date of service on you of this letter, you fail and neglect to affirm your willingness to participate in the Arbitration proceedings, it shall be deemed that you are not interested in the Arbitration process and we shall be at liberty to commence an action in the Lagos High Court for payment of our client's own portion of earned profit.

Yours faithfully,

  
VICTOR OBARO.

CC: Infiniti Systems Enterprises

*Mk. Gabriel*  
*1<sup>st</sup> Aug 2018*  
*Ch.*

**PD Jacob**

February 24, 2020

The Managing Director/Chief Executive Officer  
Sterling Bank PLC Head Office  
Sterling Towers  
20, Marina Road  
Lagos.

Dear Sir

**NOTICE OF REVOCATION OF SIGNATURE MANDATE OF MR DAPO APARA ON THE FOLLOWING ACCOUNTS: 1. ALPHA BETA CONSULTING LLP 2. ALPHA BETA CONSULTING LTD 3. E-REVENUE GATEWAY LTD & 4. INFORMATION CONNECTIVITY SOLUTIONS LIMITED AND ANCILLIARY MATTERS**

We are solicitors to Mr. Dapo Apara (our Client) and have the instructions of our client to convey the following to your bank pursuant to the notice of revocation of signature mandate dated and signed February 24, 2020 by our client to your bank, a facsimile of which is hereby attached.

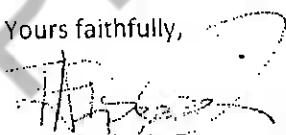
1. Our client maintains that as one of the required authorized signatories on all accounts of the four entities listed above, he has not given any authorization to any debit transactions since September 1, 2018.
2. Any debit transactions on any current, investment, or other accounts purported to have been done based on his mandate since this date is therefore an illegality, null and void.
3. The revocation of our client's mandate herein extends to Board resolutions signed by our client as well as minutes and nominations under which any persons or nominees derive fiduciary authority.

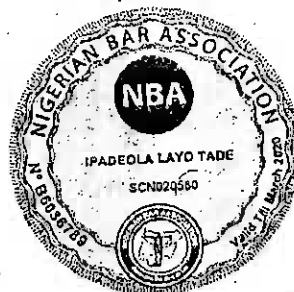
Do furnish our Client with details of all balances in the four entities listed above to which our client is a signatory within 7 days of your receipt of this letter. Our client undertakes to pay for the said bank statements.

Our client also states FOR EMPHASIS that any standing instructions executed by him before September 1, 2018 is hereby revoked and should no longer be honoured.

A copy of this letter is made available to the appropriate authorities at the Central Bank of Nigeria.

Yours faithfully,

  
Tade Ipadeola Esq.



Cc: Central Bank of Nigeria.

21st September 2020

Senator Bola Ahmed Tinubu

26, Bourdillon Road

Ikoyi,

Lagos.

Sir,

**REGARDING PROCEEDS FROM ALPHA BETA CONSULTING LIMITED AND ALPHA BETA CONSULTING LLP**

We are solicitors to Mr. Dapo Aparo, director and partner of Alpha Beta Consulting Ltd and Alpha Beta Consulting LLP respectively.

Over the course of years of operation, directors and partners of these entities claimed to have paid over significant sums of money to you and corporate entities affiliated with you as joint investment contributions.

Following the illegal replacement of Mr. Dapo Aparo with Mr. Akin Doherty in 2018, other partners of Alpha Beta Consulting LLP have consistently stated that these non-yielding investments in your good self and corporations affiliated with you are the reasons why profits due to our client in the sum of N4.1b is yet to be paid to him till date.

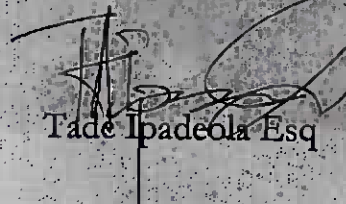
The directors and partners of Alpha Beta Consulting Ltd and Alpha Beta Consulting LLP have been conducting business, including banking and financial transactions without the input or consent of our client ostensibly with you and companies affiliated with you as beneficiaries while profits due to our client are being denied him.

Our client has since instructed the directors and partners of Alpha Beta Consulting as well as banks through which the Alpha Beta Consulting entities conduct transactions to desist from using his mandate in any shape or form as his rights to profits are still being denied and if these directors and partners are to be believed, their violation of

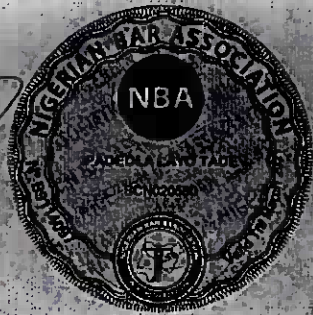
corporate governance rules and of relevant business laws in the country continue because your interests, according to them, are paramount.

TAKE NOTICE that our client will proceed to enforce his rights in the Court of Law and will join you in the proceedings to account for the parts and portions of affairs and profits of Alpha Beta Consulting business entities that your proxies in these entities have attributed to you if our client's profits are not remitted to him within seven (7) days of your receipt of this letter.

Yours faithfully,



Tade Ipadeola Esq



PREMIUM INVESTMENTS

FORM 02  
STATEMENT OF COMPLIANCE WITH PRE ACTION PROTOCOL  
(Order 5 Rule 1 (2) (e))

IN THE HIGH COURT OF LAGOS STATE  
IN THE LAGOS JUDICIAL DIVISION  
HOLDEN AT LAGOS

SUIT NO:

BETWEEN:

MR OLADAPO APARA  
(Trading under the name and style  
Infiniti Systems Enterprises)

CLAIMANT

AND

1. ALPHA-BETA CONSULTING LLP
2. SENATOR BOLA AHMED TINUBU
3. MR. AKIN DOHERTY

DEFENDANTS

**STATEMENT OF INTENTION TO COMMENCE LITIGATION**

I, Tade Ipadeola, solicitor to the Claimant hereby make oath and say as follows:

1. The Claimant has complied with the directions of the Pre-Action Protocol as set out in the preamble to the High Court Rules.
2. The Claimant has made attempts to have this matter settled out of court with the Defendant and such attempts were unsuccessful. The Claimant caused his lawyers to write the defendants several letters from 31st July 2018 to 21st September 2020 and Defendants refused or neglected to respond.
3. The Claimant has by a written Memorandum to the Defendant set out his claim and option for settlement to the Defendant.

Dated at Lagos this ..... 2nd ..... day of ..... October ..... 2020



BEFORE ME

COMMISSIONER FOR OATH

HA LOOJUN O.  
COMMISSIONER FOR OATHS  
HIGH COURT LAGOS

.....  
Signature

GENERAL FORM OF WRIT OF SUMMONS  
(O.5, r.2)

IN THE HIGH COURT OF LAGOS STATE  
IN THE LAGOS JUDICIAL DIVISION  
HOLDEN AT LAGOS

SUIT NO:

LD/7330GC MW/2020

BETWEEN:

MR OLADAPO APARA .....  
(Trading under the name and style  
Infiniti Systems Enterprises)

CLAIMANT

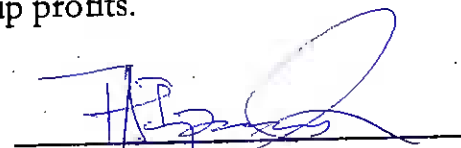
AND

1. ALPHA-BETA CONSULTING LLP
2. SENATOR BOLA AHMED TINUBU
3. MR. AKIN DOHERTY

DEFENDANTS

MEMORANDUM OF ISSUES FOR DETERMINATION

1. Whether the registered partners of Alpha Beta Consulting LLP can waive the right of another registered partner to annual accounts and profits.
2. Whether a shadow partner can vitiate the profits of a registered limited partner.
3. Whether the defendants acting jointly or severally can preclude the Claimant from his accrued profits acceding to the registered partnership.
4. Whether the Claimant has recourse at law and equity against registered or shadow partners dissipating limited partnership profits.



Counsel to the Claimant  
TADE IPADEOLA ESQ  
7, NEW ADEOYO HOSPITAL ROAD  
OFF RING ROAD  
IBADAN  
OYO STATE  
[sprylex@yahoo.com](mailto:sprylex@yahoo.com)  
Tel: 08097309652

Whose address within jurisdiction is  
11, Folashade Close, Off Falolu Road,  
Surulere  
Lagos State.





For Service On:

1. The 1st Defendant, Alpha Beta Consulting LLP of Water House, Water Corporation Headquarters, Ijora, Lagos Lagos State.
2. The 2nd Defendant, Senator Bola Ahmed Tinubu of 26, Bourdillon Road, Ikoyi, Lagos-
3. The 3rd Defendant, Mr Akin Doherty of Water House, Water Corporation Headquarters, Ijora, Lagos Lagos State and

