

NNOBI WELFARE ORGANIZATION

SECRETARIAT COMPLEX:

Nnobi Town Hall
Nnobi - Agulu Road
Idemili South L.G.A.
Nnobi.

E-MAIL:

nnobiwelfareorganization@gmail.com

MOTTO:

"Onward We March"

TELEPHONE

08032463775
08037248690
08037292266

Our Ref:..... Your Ref:..... Date:.....

30th November, 2023

**The Hon. Commissioner,
Local Govt; Chieftaincy and Community Affairs,
Government House,
Awka.**

Dear Sir,

**RE: REPORT OF MEDDLESOMENESS AND BREACHES OF THE ANAMBRA
TRADITIONAL RULERS' LAW, 2007, AND THE NNOBI TOWN
CONSTITUTION, 2011 (REVISED) PLUS ACTS THAT ARE
PREJUDICIAL TO PEACE AND SECURITY IN NNOBI TOWN BY HRH.
IGWE (ENGR.) NICK M. OBI, IGWE NNOBI.**

RE: OUR RESPONSE TO A PETITION WRITTEN IN BAD FAITH.

IN RE: PUTTING THE RECORDS STRAIGHT

Sir, I have carefully gone through the response of **HRH. Igwe (Engr.) Nick M. N. Obi, Igwe Nnobi** dated **20th November, 2023** in reaction to my report on the above subject matter made in absolute good faith, and dated **7th November, 2023**.

Although the Igwe Nnobi did not consider the PG important to be officially served with the response to his Report dated **7th November, 2023**, which I dutifully and respectfully served on him, I am convinced that the response of His Highness, without doubt, was aimed at sustained cheap blackmail, emasculating the truth, diversionary and giving a suffering, quiet and long enduring dog a bad name in order to finally hang it.

1. The response of His Highness claimed vainly that the PG Report (not Petition) dated **7th November, 2023** was a personal complaint, not an official statement of the goings on in Nnobi Community. Nothing could be further from the truth. The President-General of any Community, who was given a **Certificate of Recognition** by the Anambra State Government, has a sacred duty to bring the Government up to speed on the state of his Community, especially constitutional breach which has the potential of precipitating crisis in the Community.

The PG of a Town is not the PG of himself, but of a whole Community, and whenever he felt a strong compulsion and issued an official statement to state actors about conducts likely to cause breaches of peace in his Community and in

his capacity as President-General, he is invariably speaking the mind of the Community at large. He does not require the fiat of the Community before he brings a Report to the Government over constitutional issues militating against peace and harmony in the Community. **Section 64 (1) (j)** of the 2011 Constitution enjoins the President-General to uphold and defend the Constitution. In the discharge of that sacred and constitutional mandate, he enjoys a large dose of discretion, and does not require the fiat of the Central Executive Committee (CEC) of the Nnobi Welfare Organization, the Annual Representative General Meeting (ARGM) or the Quadrennial Conference of Nnobi People in the exercise of a constitutional mandate in defence of the Constitution. It is tantamount to muzzling the constitutional powers of the President-General if he had to scurry back each time to the CEC before he can take any decision, especially in emergency situations. The doctrine of necessity becomes imperative and comes to the rescue.

2. The claim that the PG wrote his Report in his personal letterhead paper as PG Nnobi, is to say the least, diversionary. The letterhead paper of the PG with its inscription as the PG of the Nnobi Welfare Organization, or the official letterhead paper of the Town Union is not synonymous with, and adds nothing or detracts nothing from the office or person of the President-General of any Community. The same thing is applicable to the office of the Igwe Nnobi. In uncountable number of times, his personal actions, statement or releases were binding on the Igwe-in-Council and was wholesomely accepted. **Cucullum non facit monarchum (A hood does not make a monk).**

The Igwe Nnobi has a letter head paper and most times what he sends out became binding on the Igwe-in- Council or the Nnobi Community. His Highness never discussed his submission at the **Truth, Justice and Peace Commission** on **2nd November, 2023** at Awka with members of the Igwe-in-council or Ndi Nnobi. Notwithstanding, his submission was viewed as the official position of Ndi Nnobi on the matter. The letter head paper or absence of same does not personify the office of the PG or otherwise, but the message conveyed by the person holding the office. The contents of the message determines whether he is writing a love letter in his personal capacity, or discussing serious constitutional issues affecting the corporate existence of the Community which he represents.

3. The PG maintains that the arrest and detention of his officers and constructively himself too was primarily orchestrated from the Palace. Find attached letter of Igwe Nnobi to the CEC of N.W.O. dated **24th October, 2023** and the text message of the Divisional Police Officer to the PG dated **25th October, 2023** as **Annexures 1 and 2.**

The DPO message read:

" The Commissioner of Police, Anambra State has been reliably informed by the Igwe through me, of the attempt by you and your collaborators to cause breach of peace at Afor Market Nnobi tomorrow being 26/10/2023. The Commissioner of Police has therefore invited you Barr. Dominic Okpala for his interview by 9.am prompt. Failure to honor this interview will lead to your arrest and

prosecution. You have been further warned to desist from interfering with legitimate activities of the Afor Nnobi market or face the wrath of the law. FROM DPO NNOBI "

Facts are sacred and speak for themselves.

4. Indeed, the said letter of Igwe Nnobi dated **24th October, 2024** to the CEC stating that he did not sanction the closure of Afor Nnobi Market was instructive. The letter was supposed to be read and acted upon on the next meeting of the CEC which fell on **18th November, 2023**. The letter was never directed personally to the PG but to the CEC. The Igwe cannot in one breath claim that the PG Report to ANSG was personal, but in another breath claim that the letter to the CEC of N.W.O. was directed to the PG. That was sophistry.

The Igwe Nnobi did not wait for the letter to be read on the floor of the CEC before getting the Commissioner of Police and the DPO Nnobi to arrest innocent officers carrying out their legitimate duties the next day. Alternatively, as the Chief Security Officer of Nnobi Community who meant well for his Community, the PG as Secretary and DPO as member, His Highness never deemed it fit to summon an emergency meeting of the Nnobi Security Supervisory Committee to address the alleged security fears.

5. The PG never had any altercation with the TC Chairman, Idemili South L.G.A. about the crisis in Afor Market or how to solve it. However, the PG was displeased that the TC Chairman imposed herself on the Community, and was coyly trying to take over the duties of the PG in bringing peace back to the market to score cheap political points, and to create the wrongful impression that the PG was weak and ineffective. Besides, the TC Chairman developed inexplicable interest in the affairs of Afor Nnobi Market shortly after she was given an honorary title by the Igwe Nnobi.
6. The claim that the Igwe Nnobi had no issues with the Nnobi Caretaker Committee or the CEC headed by the PG is an unforgivable denial. Any well meaning Ndi Nnobi would testify that Igwe Nnobi made the tenure of the Nnobi Caretaker Committee hellish and stopped at nothing to frustrate that administration. The Igwe Nnobi was constantly at loggerheads with the helmsmen of the Nnobi Caretaker Committee and was always berating the Anambra State Government for nullifying the sham election that produced his friend and confidant, **Mr. Felix Onwuka**.

Even when the Anambra State Government requested him to nominate three candidates during the early days of the CTC, the Igwe declined until he saw that he shot himself at the foot through that miscalculation. He has restated in his response that the CTC was an anomaly. The Igwe however did not want to own up that he indirectly invited the Anambra State Government to set up the Caretaker Committee in Nnobi when he continued to meddle in the PG selection process in Ebenesi Quarter just to ensure that his preferred candidate won.

7. Contrary to the claims of the Igwe, the 2011 Nnobi Town Constitution did not cover the situation in Nnobi that would have warranted the Trustees of N.W.O. to

take over the administration of Nnobi for three months instead of the setting up of the Nnobi Caretaker Committee after the sack of **Mr. Onwuka Felix. Section 78 (e)** of the Town Constitution cited by the crown was inappropriate, and a pointer at how the palace usually misinterprets our Constitution to serve its purpose, because the section was subject to and must be read together with **Section 41** as stated in the section quoted by the Igwe. The circumstances in Nnobi then under which **Section 41** could have been activated did not arise. Simpliciter, there was no vote of non- confidence by the **Annual Representative General Meeting** on **31st December, 2019** on the CEC by any financial member or branch of the N.W.O. to pave way for the **Board of Trustees** to take over the administration.

8. Funny enough, Igwe Nnobi insists that 2019 was a Quadrennial year. A vote of no confidence cannot be moved in a Quadrennial Conference of Nnobi People and the Board of Trustees cannot take over the administration of Nnobi in a Quadrennial Conference, only in an Annual Representative General Meeting, the highest decision making body in Nnobi. So the Anambra State Government was perfectly in order in setting up the Nnobi Caretaker Committee. The alternative would have been interminable constitutional crisis.
9. For the avoidance of doubt, the Law which provides for the registration of Town Unions in Anambra State is the **Fund For Rural Development Law, Cap. 54, Revised Laws of Anambra State, 1991. Sections 26 and 27** of the State Law which is superior to the Nnobi Town Constitution makes provision for the setting up of the Caretaker Committee in any Community. **Section 26** provides:

"Where it appears to the Commissioner from the petitions or representations made to him or from other evidence made available to him or at his disposal"

- a. That the continued existence of a Town Union-
 - i. Is not in the interest of peace or progress of the Community for which it is instituted; or
 - ii. adversely affects the rural development efforts or programme of the Government or of the Community for which it is instituted; or
- a. That there exists two or more factions, or that there is an unhealthy rivalry among members or in the leadership of a Town Union thereby making the realization of the purposes of this Law difficult or impossible, he may by notice under his hand dissolve the Town Union concerned.

1.
2. On the dissolution of a Town Union pursuant to this section, the Commissioner shall constitute in its place a Caretaker Committee comprising such number of persons as the Commissioner may determine and the members of the Caretaker Committee so constituted shall, until the dissolved Town Union is reconstituted in accordance with subsection (2), carry out the functions or activities of the Town

Union under this or any other Law, or under the Constitution, rules or regulations, as the case may be, of the Town Union."

See the Judgment of NRI-EZEDI, J. in BARR. ANDYO. UZUAGU VS. MR. CHRISTOPHER EZEANI & 8 ORS; SUIT NO: HID/MISC/111/2020 delivered on 15th September, 2021.

10. "The claim in **Paragraph 2.01** of His Highness' response is very sad and shocking, and strikes at the very foundation of the constitutional logjam and frequent skirmishes between the traditional institution and town union administration in Nnobi.

The Igwe Nnobi has found it increasingly difficult to come to terms with the fact that **Sections 25 & 26** of the Nnobi Town Constitution has domesticated **Section 11** of the Anambra State Traditional Rulers' Law, and to subject His Highness to the supremacy of Ndi Nnobi as the highest authority in line with their Constitution, when they congregated and crowned him their king.

11. **Section 11** of the Anambra State Traditional Rulers' Law provides:

"Where under this Law, anything is required to be done or received by a Town or Community, that thing shall be deemed to be done or received at the direction of the person or persons or group or body of persons who, or which under the customary law of the town or Community has or have functional roles to play in the selection or appointment of their traditional ruler."

The okro tree cannot be bigger than the person who planted it. The supreme power resides with the people. A part can never be greater than the whole. The Igwe Nnobi is not an emperor. He derives his power and legitimacy through the Nnobi Town Constitution and the people of Nnobi.

12. I admit the claim in **Paragraph 2.02** that the Igwe Nnobi is not a member of the Annual Representative General Meeting of Ndi Nnobi, the highest authority in Nnobi, but only it's **Patron**. The necessary component and implication of that claim is that a Patron cannot be bigger than the Association that made him their Patron. He simply enjoys their patronage subject to good behavior and within the confines of the town Constitution.

13. The claim in **Paragraph 3.01** of the response is the very height of sophistry and placing logic and clear thought on its head. I make bold to state that being the highest decision-making body in the whole of Nnobi, and with the constitutional powers "to ratify, rescind, amend or approve any decisions or recommendations" under **Section 26 (h)** of the 2011 Constitution, the Annual Representative General Meeting have the plenitude and superiority of powers over and above the Quadrennial Conference of Nnobi People.

As such, it can upturn any ratification or adoption of the so-called controversial 2019 Constitution (assuming but not conceding) there was such adoption on **31st December, 2019**, if it was thereafter discovered that the

processes leading to the adoption was flawed (not fraud for fear of being misquoted). The processes leading to the making and birthing of a Constitution is by far more important than the contents thereof. If the process is faulty, then by necessary implication, the Constitution itself is faulty and cannot bind the Community. That was the tragic fate that befell the 2019 document, or was it Constitution?

14. The claim of the Igwe Nnobi in **Paragraph 3.02** of the response once again and regrettably portrays His Highness as an emperor. The Igwe Nnobi is signatory to the 2011 Constitution and all its 2013 and 2014 amendments.
15. **Section 13** of the Anambra State Traditional Rulers' Law puts it beyond speculation what a town Constitution consists of and the rights and privileges of the traditional ruler and all those who play functional roles in the selection of the Traditional Ruler. This law has been domesticated and codified in the 2011 Constitution.
16. **Sections 138 and 142** of the Nnobi Town Constitution, 2011 contain copious and detailed provisions about the rights of the traditional ruler and the N.W.O. on issues bothering on titles in Nnobi. The claim that the issue of conferment of titles is the exclusive preserve of Igwe Nnobi under our Constitution is a farce and an unqualified assumption. The town Constitution is very clear on the synergy, co-operation and consultation that must exist between the traditional institution and the town union administration in the area of conferment of titles in Nnobi.
17. It must be stated that it is the people of Nnobi that acclaims any title given to any indigene of Nnobi. As such, the people of Nnobi must have a hand in the conferment of the titles through the town union government. The title recipients are not the recipients of the Igwe, but the Nnobi people. This is why the ARGM decided that titular certificates must signed by the Igwe, the PG and the Secretary-General to make the title the collective decision of the people of Nnobi, not just the Igwe.
18. The claim in **Paragraph 4.01** regarding the powers of the Igwe-in-Council as the highest authority in issues regarding to the suspension and termination of an Ichie is a calculated and disingenuous attempt to deceive Ndi Nnobi.
19. **Section 135 (a)** provides:

" Where an Ichie after due and careful deliberations by the Igwe-in-Council, is found to have grossly misbehaved or performed below what is considered reasonable standards, such Ichie shall be suspended for a period of one year."

Under the rules and principles of natural justice, it was expected that the Igwe-in-Council, the statutory suspending body, must have given the Ichie the right of fair hearing before being suspended.
20. On **18th December, 2020**, the Igwe Nnobi, (not the Igwe-in-Council) wrote the embattled Ichie, **Chief Ogujiofor Okwudili** requesting him in writing to explain why disciplinary actions should not be taken against him. The Igwe

Nnobi is not the Igwe-in-Council. They are two distinct personalities. The letter of Igwe Nnobi cannot bind the Council. The letter of Igwe Nnobi dated **18th December, 2020** is attached as **Annexure 3**.

21. Again on **7th January, 2021**, the Igwe Nnobi wrote the Ichie using his official letterhead paper, and stated amongst other things:

" Your attention is invited to my earlier letter to you dated 18/12/2020 on the above subject matter. In your intransigence, you have continued to snub the scheduled/expected reply demanded of you by that letter. By this, you have opted to ridicule and deride the integrity of the Traditional institution of this Community.....I am further directed to inform you that your reply to this letter/reminder must reach the Igwe not later than seven (7) days from the date of this letter."

Once again, from this letter, it is very clear that the Igwe Nnobi was only acting for himself not for the Igwe-in-Council. The letter of **07/01/2021** is attached as **Annexure 4**.

22. Things came to a head on **6th February, 2021** when the Igwe Nnobi, who had every access to the letterhead paper of the Igwe-in-Council, wrote the Ichie another letter on the Igwe-in-Council letterhead paper:

" Further to the queries of 18/12/2020 and 07/01/2021 including your response therein and failure to honour the invitation to attend the Igwe-in-Council meeting of 06/02/2021, it is the decision of the Igwe-in-Council to convey the following information to you.

- 1. After due and careful deliberations on your conduct/activities deemed by the Council to be detrimental/inimical to her, decided unanimously to terminate your membership of the Igwe-in-Council Nnobi."***

From the contents of this letter, it is very clear that the Igwe-in-Council, (assuming but not conceding, that the letter of **6th February, 2021** was from the Council) wrongfully based the termination of **Ichie Ugoabata** on the two earlier letters from Igwe Nnobi. In other words, the Igwe-in-Council never gave the Ichie any opportunity to put across his case. There was never a letter of invitation extended to the Ichie to attend the Igwe-in-Council on **6th February, 2021**. The letter of termination dated **6th February, 2021** is attached as **Annexure 5**.

23. **Section 136 (2)** of the Constitution provides:

" The Igwe-in-Council shall be the final authority on the suspension and termination of an Ichie. He has right of appeal to the Annual Representative General Meeting of the N.W.O."

The implication of this provision is that the the Annual Representative General Meeting is the final authority on the issue of suspension and termination of an Ichie. The ARGM can override the Igwe-in-Council. The claim of the palace

that the right of appeal is superfluous, is a dishonest argument devoid of meaning. The claim too that **"all members of the IIC are members of the ARGM that will still decide the appeal"** is also a deceitful argument.

24. For the avoidance of any modicum of doubt, under **Section 22** of the 2011 Constitution, members of the Igwe-in-Council form only about **10%** of the composition of the ARGM, an insignificant minority. Besides, it is expected that having participated in the deliberations in the Council Chambers to suspend or terminate an Ichie, the rules of natural justice holds the view that they ought to revise themselves from participation in any statutory vote in the ARGM concerning the recall of a suspended or terminated Ichie. To do otherwise would open themselves up as being a judge in their own case.
25. Be that as it was, on **31st December, 2022**, following the letter of appeal filed by **Ichie Ugoabata** which was read on the floor of the ARGM, the august body overwhelmingly upturned and rescinded the termination of the embattled Ichie. The claim by the Igwe that Ichie Ugoabata did not appeal against his termination to the ARGM is a ridiculous denial crying up to heaven for vengeance. The Igwe-in-Council under the auspices of the Igwe Nnobi are yet to implement that decision. The **Minutes** of the ARGM of **31st December, 2022** is attached as **Annexure 6**.
26. I am miffed at the claim that it was the Igwe-in-Council and not the Igwe that expelled the embattled Ichie from the Council. The first and second letters threatening to expel the Ichie from the Council were on the letter head paper of the Igwe Nnobi. The personal act of the Igwe Nnobi cannot bind the Igwe-in-Council as the response of the Igwe Nnobi to my Report rightly confirmed. So the two letters aforesaid had nothing to do with the Igwe-in-Council.

Therefore, since the letter that eventually expelled the Ichie from the Council was on the letterhead paper of the Igwe-in-Council, on what basis then did they claim to expel him from the Council without first giving him an opportunity to defend himself? It is noteworthy to state here that the base political shenanigans that attended the expulsion of Ichie Ugoabata from the Council have since sharply divided the Council till today. The Ichies from Ebenesi Quarter and one of the oldest Ichies in the Council have continued to challenge the Igwe Nnobi to provide the minutes of the meeting of the Igwe-in-Council where the deliberations of the Council to terminate **Ichie Ugoabata** took place, but to no avail.

27. To the Igwe, the Annual Representative General Meeting (ARGM), the highest decision making body in Nnobi, is an inferior body to himself and the Igwe-in-Council. Indeed, he said that much in his letter dated **14th November, 2023** in response to his invitation refusing to attend the **Emergency Representative General Meeting (ERGM)** of **18th November, 2023** where he stated:

" Igwe Nnobi is not a member of ERGM and cannot be invited to answer queries by a body that is beneath him." The letter of Igwe Nnobi dated **14th November, 2023** is attached as **Annexure 7**.

The ERGM has concurrent and co-ordinate powers with the ARGGM (**Section 24 (2), 2011 Constitution**). It is therefore very easy to see that the Igwe Nnobi sees himself as above the law, the Constitution and the people of Nnobi. He is law unto himself. He is the new Emperor of the 21st Century in Nnobi.

28. The claim from the Palace that the embattled Ichie is challenging his termination in court is half-truth, because he has already filed and served his **Notice of Discontinuance** dated **31st May, 2023**. Find same attached as **Annexure 8**.

29. The claim in **Paragraph 5.01** of the response is a cocky denial and a confirmation that the Igwe Nnobi places the Bye-Laws of the Igwe-in-Council above the Nnobi Town Constitution. That also explains why the Igwe Nnobi thinks he is above the Nnobi Town Constitution and carries on as such. But notwithstanding, **Section 11** of the Nnobi Town Constitution is very clear:

" The N.W.O. shall exercise supreme authority on all other bodies, Committees or organization in Nnobi while matters relating to traditions, customs and culture shall be treated in accordance with the provisions of the Anambra State Traditional Rulers' Law, 1981 as amended."

In other words, the combined operation of this Section and **Section 11** of the Traditional Rulers' Law put it beyond conjecture that the Igwe-in-Council and Igwe Nnobi are subject to the Nnobi Town Constitution.

30. The response of Igwe Nnobi in **Paragraph 5.03** is diversionary and escapist. The correct position of the law remains that the fact that the Igwe Nnobi shall constitutionally sign the Nnobi Town Constitution does not require him to interfere in the process of the making of the Constitution.

However, if there are Bye-Laws and other regulations made by the Nnobi, which Bye-Laws are inferior to the Constitution, the Igwe Nnobi can make an input _as provided in **Section 114 (12)** of the town Constitution, which provides unequivocally thus:

" The Igwe of Nnobi shall have the authority to review any proposed rules and regulations by the N.W.O. giving his comments in writing on such issues to the N.W.O. Where the Igwe of Nnobi holds a contrary view on issues raised by the N.W.O. and consequently withholds his approval, after a period of three consecutive months, the issues shall be referred to the Annual Representative General Meeting of N.W.O. for a final decision. Such decision shall be binding on all."

In other words, in the making of the new Nnobi Town Constitution, the only functional role of the Igwe is restricted:

- a. To sign the new Constitution in line with **Section 123 (2)**.
- b. In fact, amongst other dignitaries, he shall sign the Constitution in the presence of the President-General, not otherwise.

- c. Any other perceived roles aside of the one prescribed by the Constitution above is meddlesome.

31. There is no scintilla of doubt that the Palace is struggling to come to terms with the powers of the PG under **Section 11** of the Traditional Rulers' Law as amplified by **Section 64 (1) (a)** of the 2011 Constitution. Conceded that the day-to-day administrative powers of Nnobi resides with the **Central Executive Committee of the. N.W.O.**, it is gainsaying that the CEC is an artificial entity, not a natural person. The CEC cannot drive itself but must have an **alter ego that is a natural person to drive it**. It is therefore the exclusive domain of the PG to drive the CEC, except in his absence when the organogram or hierarchy of power is activated to preside in his stead. The claim that the absence of the PG does not affect the quorum of the CEC is vain and of no moment. Nature abhors a vacuum as no mortal is indispensable. But the PG must not be hurried to his untimely grave just to get him off the way.
32. The reference in **Paragraph 5.05** of Igwe's response to " **a group or body of person who, or which under the customary law of the town or Community, has or have functional roles to play in the selection or appointment of their traditional ruler**" found in **Section 11** of the Traditional Rulers' Law, with due respect, shows that the Palace is at a loss as to the true meaning of the customary law or code of conduct of a town or Community as defined in the Traditional Rulers' Law.
33. To assist the Palace in this regard, I respectfully refer to **Section 13** of the Traditional Rulers' Law which provides:
- " **The constitution of a town or Community shall consist of:**
- a. **a detailed statement of the customary law of the town or Community regarding the selection, appointment, suspension, deposition rights, privileges of the traditional ruler of the town or Community;**
 - b. **prerogatives and customary code of conduct existing between the traditional ruler and the town or Community concerned and identifying the person or persons or group or body of persons specified in Section 11 of this Law."**

Put simply, the customary law of a town or Community is the Constitution of the Community and the persons or group under the said Constitution who play vital roles in the selection, appointment, suspension or deposition of a traditional ruler in that Community.

34. In the case of Nnobi Community, the customary law or functional roles being referenced in the Traditional Rulers' Law are copiously domesticated and provided for in **Sections 100 and 109** of the 2011 Constitution, all of which are driven and superintended by the N.W.O. and the Okpala-in- Council and culminating in the installation of a new Igwe. The Palace therefore completely misinformed and misled the people of Nnobi by citing **Sections 119, 121,**

122 and 145 (2) of 2011 Constitution, which cannot be constitutionally activated until **Sections 100 and 109 are invoked into being**. It is indeed very sad and heart-rending that our traditional institution can go this far in misleading and misinforming our people. Tomorrow, when we have another PG, some of the lies being peddled from the Palace may come back to haunt us.

- 35.** On the issue of the 2019 alleged Constitution as claimed in **Paragraph 5.08**, I need not dissipate further energy on same except to restate and re-emphasize that on the of **12th February, 2022** that this administration held its inaugural meeting, the same Palace Secretary, **Ichie Ezeobi** who authored this publication on behalf of the Igwe, was the same person that boldly moved the motion for the continuing operation of the 2011 Constitution because of the controversies surrounding the 2019 "**Palace Bible**". He knew better than most of us. The Minutes of the CEC Meeting of **12th February, 2022** is attached as **Annexures 9**.
- 36.** The Governor's consent is a pre-requisite for the amendment or review of any Community Constitution. The current PG did it. **Dr. Omenugha M.C.; Ichie Obama** as PG Nnobi between 2008 and 2011, also obtained the requisite consent when the 1988 Constitution was reviewed which birthed the 2011 Constitution. Ichie Obama is still around for confirmation.
- 37.** However, assuming but not conceding that no consent was obtained preparatory to the review of the 2011 Constitution, its general acceptability came to its rescue. The same cannot be said of our 2019 headache. But the fact remains that the law remains the law, and the ignorance of law is no excuse. The 2019 document has no legal backing.
- 38.** The tragedy of the 2019 Constitution allegedly approved on **31st December, 2019** by the nullified administration of **Chief Onwuka Felix**, is that as at **2nd July, 2020**, **Chief Charles Chinyelugo**, the then **Secretary-General** of **Chief Onwuka Felix** was still quoting copiously from the 2011 Nnobi Town Constitution. While admitting that the election that produced them was deeply flawed, and calling on the Anambra State Government to fix a date for a new round of election, he stated thus:

" Sir, the following dates for the exercise are proposed for your ratification or any other date you prefer: i. Saturday, **1st August, 2020**. ii. Saturday, **29th August, 2020**. In view of the fact that Late **Dr. Edoks Ofofile** led administration has been dissolved on **31st December, 2019**, the Board of Trustees should therefore take over and hold office for three months and conduct an election of new executive in accordance with the provisions of Nnobi Town Constitution, Revised 2011."

This is conclusive proof that the 2019 alleged Constitution may have been a scam. The said letter received by your Ministry on **3rd July, 2020** is attached as **Annexure 10**.

39. The claim in **Paragraph 5.09** is what humans get when they become too smart. Nnobi Community operates a zoning arrangement of offices for four years under **Section 60** of the Constitution. When **Late Edokobi Ofofile** died in office, the right thing was for Awuda Quarter to have quickly produced a new PG for Nnobi even if he lasted only one day in office to complete the unbroken tenure of Awuda. But that did not happen. The Palace and the cabals had other ideas. **Mr. Felix Onwuka** should quickly be drafted in to stand him in good stead to compete against his compatriots from Ebenesi as a darling and 'good boy' of the Palace. That move short-changed Awuda and worked the greatest hardship on **Mr. Onwuka**.
40. The claim in **Paragraph 5.11** of Igwe's response demonstrates once again the penchant of the Palace for placing the law and logic in its head.
- c. For clarity, the operative word in **Section 114 (3)** of our Constitution is "**co-operate**" and not to interfere.
 - d. Secondly, I am glad that the Crown is now willingly and copiously quoting from the 2011 Constitution. In that regard, **Section 114 (6)** referred to by the Palace says in part:
" The Igwe shall....preserve and protect this Constitution in his official capacity."
 - e. The phrase "**this Constitution**" refers to the 2011 Constitution which he subscribed to. Why then is the Crown head of Nnobi hell bent on setting a peaceful Community on fire over "**a strange, mischievous and sacrilegious**" document?
41. My heart was aglow reading the claim in **Paragraph 5.12** of His Highness' response. For those who out of forgivable ignorance or misinformation, hold the view that the PG was not revering the King or carrying him along in what he does, this statement credited to the Palace about the letter from the N.W.O. dated **25th October, 2022** requesting the Igwe to nominate three persons of his choice to serve as members of the Constitution Review Committee, has exonerated the PG.
42. The fact that the Igwe has no direct and identifiable role under the Traditional Rulers' Law in the making of a town Constitution did not preclude the respect to be accorded to His Highness as the traditional ruler, by requesting him to nominate persons who will participate in the Constitution review exercise. Therefore, the whole essence and wisdom in the N.W.O. request to His Highness to nominate three persons of his choice, was to enable the King indirectly make his inputs on the review to the Constitution. But unfortunately, His Highness had other ideas.
43. In response to **Paragraphs 6.01-6.04** of the claim of His Highness, I remember vividly that I advised the Igwe very early to invite together under one table all the ***dramatis personae*** ranging from all the members of the defunct 2018 Constitution Review Committee, the Secretary-General under Late Ofofile and all the members of the Nnobi Caretaker Committee including any person who played one role or the other to make an inquest into the fatal

fate that befell the 2019 document. That didn't happen. It did not take time before Ndi Nnobi in one meeting after another completely turned their back on that document.

44. Whatever any person might say to the contrary, the fact remains that no document or process in the annals of compendium of Nnobi Community had been as controversial and stoking passion as the alleged 2019 Constitution and the processes that led to its emergence. I have said it here that the process of making a Constitution is far more important than the contents of the Constitution itself.

That the issue of the 2019 alleged Constitution is still festering till date is a pointer that something went awful wrong somewhere in the making of that Constitution, which Ndi Nnobi could not let go. A people decides a Constitution that will govern them, not one imposed on them. If Ndi Nnobi is in love with the 2011 Constitution pending its review, it can never sound pleasant to the ears, that the Igwe of a very elitist Community like Nnobi, is akin to forcing two strange bedfellows to cohabit under one roof.

45. The statement in **Paragraph 6.02** that it is the Quadrennial Conference of Nnobi that is constitutionally empowered to amend/review the Constitution is admitted in part. However, **Section 10** of the 2011 Constitution tells you how to start the process of the amendment/review culminating in the approval at the Quadrennial Conference. The process does not start and end at the Quadrennial Conference. On the contrary, the process can start at the ARGM, the CEC or the QC, but must end at the QC if it is a Review or at the ARGM if it is an amendment. The Palace must strive at all times to educate our people right, and not to confuse or confound them with half- truths or constitutional provisions interpreted on its head down.
46. It is also not true that it is only the Quadrennial Conference that can make or reject a Constitution. The Quadrennial Conference (QC) is not the highest authority in Nnobi but the ARGM. A suspect Constitution allegedly rubber stamped by a goaded QC can be rejected by the ARGM under **Section 26 (h)** the Constitution. The Constitution is a living document not a straight-jacket.
47. **Paragraph 6.06** of His Highness' response is amusing and portraying the Palace in bad light. Ndi Nnobi have not forgotten so soon how His Highness reluctantly attended the **31st December, 2020 ARGM** of the **Nnobi Caretaker Committee**, where he presented Ndi Nnobi with a bound copy of the 2019 alleged Constitution, adding that Ndi Nnobi must pay him back the sum of **N250, 000 (Two Hundred and Fifty Thousand Naira only)** which he expended in producing the Constitution, before he would hand the produced documents over to the CTC.
48. We have also not forgotten the legendary drama and comic relief that played out on the floor of the said ARGM when the Chairman of the defunct Nnobi Caretaker Committee, **Chief Chris Ezeani** angrily threw away the "2019 headache" from the CTC high table, and bluntly and courageously told Ndi

Nnobi, that as the then **Secretary** of the inconclusive Constitution Review Committee, they never concluded their sitting on the review exercise due to so many disagreements and interferences from the Palace, much less requesting our Igwe to produce the Constitution for Ndi Nnobi.

49. We have also not forgotten the information the CTC gave Ndi Nnobi on the day, how a split Constitution Review Committee, who did not come to terms with the setting up of the Nnobi Caretaker Committee, were holding a separate Meeting directly opposite the Town Hall Secretariat, while the members of the CTC headed by the Secretary of the defunct Constitution Review Committee was presiding over the CEC Meeting just to spite him and the CTC. All members of the defunct CTC are still alive to confirm these narratives. I also attach herewith a copy of the **Hand Over Note of the CTC dated 20th January, 2020 as Annexure 11.**

50. The continuing reference of Igwe Nnobi of the alleged 2019 Constitution alongside the operating Nnobi Town Constitution, 2011 has been generating unnecessary and avoidable tension in the Community since my administration came into office. On **7th May, 2022**, the Igwe Nnobi issued a **Proclamation** from the Palace in which he continued to quote copiously from the 2011 and 2019 Constitutions simultaneously side by side. For instance, under traditional events in the proclamation, he had this to say:

" There is in existence the Anambra State Traditional Rulers' Law, 2007 as amended, Nnobi Town Constitutions 2011 and 2019."

Also under **Paragraph 5.2** he stated:

" The PG is yet to take the oath of office as required in Schedule five and Schedule six of the 2011 and 2019 Town Constitutions respectively, following which he will administer the Oath of office on N.W.O. officers."

The PG holds the firm and unyielding view that no human institution operates two Constitutions at one and the same time. It is a recipe for crisis. The officers of the N.W.O. have been locked up in interminable correspondences with the Palace over this disturbing developments, but the Palace continued to call the bluff of Ndi Nnobi with relative impunity. The letters dated **07/05/2022, 11th August, 2022, 5th October, 2022 and 20th October, 2022** are attached as **Annexure 12 (a-d).**

51. While the Igwe Nnobi continued to live in denial about his being carried along in all the step by step processes in the ongoing constitution review exercise, including coming severally to your office to lay unfounded allegations against the PG, I carefully documented a Report to your office showing all that my office did to carry His Highness along in the review of the 2011 Constitution approved by your office. My Report dated **15th October, 2022** is attached as **Annexure 13.**

52. As if the 2019 alleged Constitution had not received enough bashing, on **31st December, 2022 ARGM**, Ndi Nnobi once again and finally struck the death

nail on the coffin of the 2019 nightmare of Ndi Nnobi and bade it farewell through another resolution to that effect. The **Minutes** of the ARGM of **31st December, 2022** attached as **Annexure 14**.

53. Paragraph 6.07 of His Highness' response represents a direct affront and confrontation with the Anambra State Government. That the Palace was and is still angling over **Chief Onwuka** as the PG of Nnobi is an indication that we have a King who does not want to reign over a peaceful Kingdom. **Chief Felix Onwuka** was never legitimately elected as the PG of Nnobi, but an imposition on Ndi Nnobi by the Palace working in cahoots with **Barr. Andy Uzuagu**.

54. I am struggling to come to terms with the position of His Highness that the ANSG "**did not nullify the administration of Chief Felix Onwuka as a result of irregularity in the conduct of the election, but on the alleged complaint that they did not witness the election.**"

What then is the meaning of "**Irregularity**"? The Dictionary meaning states that it is a violation of rules. The purported election of **Felix Onwuka** failed woefully to comply with the ANSG **Guidelines on the Conduct of elections in Anambra State**. The first election that produced **Mr. Okechukwu Madunagu** as the Youth Leader suffered similar fate, until a new round of election monitored and supervised by the ANSG re-elected him, and his four year tenure commenced on the date of his re-run election. It is my considered view that the Palace is taking joy in playing with the collective consciousness and sensibilities of Ndi Nnobi.

55. On another note, if **Chief Felix Onwuka** and those that are beating the drums of war on his behalf did not accept the nullification of his election on **29th June, 2020**, why did the same **Chief Onwuka** regime author the letter of **2nd July, 2020** to the ANSG accepting the invalidity of his election thus:

"Your letter Ref. OSPA/LG/CM/26/IV/504 of **29th June, 2020** on the above subject matter refers.

I am directed to graciously invite your Ministry to come and supervise the Nnobi Town Union elections....

Sir, the following dates for the exercise are proposed for your ratification or any other date you prefer.

- i. **Saturday, 1st August, 2020**
- ii. **Saturday, 29th August, 2020."**

56. The above lines represent an express admission of failure to comply with the laid down regulations for the conduct of elections in Anambra State, and a further admission that the nullification of the sham election that produced him by the ANSG was legit. **See Annexure 9** for ease of reference.

57. The PG has refused to join issues with the Palace on the rebuttal in **Paragraph 7.02**. The attack on the person of the PG does not scratch any surface. Altercation and name callings don't win arguments. It is called "

Argumentum ad hominem" (attacking the person rather than issues)
in logic. The Palace handlers are portraying the King well.

58. **Paragraph 7.03** is another attempt to pull the wool in the "**shine shine eyes**" of Ndi Nnobi. The crown must eschew the continuing selective application of the Constitution, highlighting what it considered favorable but suppressing what is unsavoury to its entrenched interest. The Constitution must be interpreted as a whole not in parts. What the Traditional Rulers' Law considers the domain of culture, custom and tradition in Nnobi Community has been domesticated and codified in the Nnobi Town Constitution and assented to by our Igwe.
59. Although the Asha-Olu is a traditional Festival, the Nnobi Town Constitution signed between His Highness and Ndi Nnobi gave a breakdown of how the festival must be celebrated every year and who does what or gets what. **See Section 189 (3) of the 2013 amendment to the 2011 Constitution.**
60. Equally, **Section 90 (5)** of the **2014** amendment to the 2011 Constitution also signed by His Highness, Igwe Engr. Nick Obi provides:
- " Anybody or Committee that receives any funds or donations etc. on behalf of Nnobi shall immediately inform the C.E.C. of the receipt of the funds and the funds be paid into the N.W.O. bank account or as may be directed by the government."**
61. The N.W.O. never complained about the proceeds of Asha-Olu, and never demanded for any proceeds of Asha-Olu. But the N.W.O. with the PG as the Chief Accounting Officer must ensure that all funds or donations meant for Ndi Nnobi is warehoused in the N.W.O. account before disbursement. But the Palace has consistently withheld and spending at will and without the authorization of the N.W.O. the sum of **N1, 500,000 (One Million, Five Hundred Thousand Naira)** MTN Grant for Nnobi Asha-Olu since 2020.
62. It is therefore cold logic and unacceptable accounting standards for the Palace to claim that the MTN Grant should not be warehoused with the N.W.O. in line with extant laws because the N.W.O. does not share in the proceeds of Asha-Olu. This is a clear case of **"misappropriation"** of funds.
63. The money/ grant from the MTN was given to Nnobi Community for the celebration of Asha-Olu, not to Igwe Nnobi or the Igwe-in-Council. It is very shameful, morally low and audacious logic for the Palace to claim that:
- " The MTN money alleged to have been cornered by the Igwe is the exclusive preserve of the Igwe and the Cabinet."**
64. **Section 189 (3)** of the **2011 Constitution** states in very unambiguous terms that **" The Asha-Olu Festival shall be the responsibility of Nnobi people."** The phrase **"Nnobi People"** is not restricted just to the Igwe Nnobi and the Igwe-in-Council. The N.W.O. is not the whole of Nnobi. The fact that N.W.O. officially does not share in the proceeds of Asha-Olu does not also mean that the N.W.O. cannot hold and warehouse the MTN Grant in

trust for the people of Nnobi in tandem with the dictates of the town Constitution. Moreover, if MTN gives us a grant every year, it smacked of Igwe Nnobi as a poor financial Manager to have the proclivity to spend all we got.

65. The Igwe Nnobi has been receiving these monies on behalf of Nnobi since 2020, but he has never accounted to Ndi Nnobi how he spent these funds. For the avoidance of doubt, the Asha-Olu Festival account usually rendered by the Asha-Olu Committee is quite different from what we are discussing here. Is it not time we told ourselves the truth? The Palace is wholesomely being mishandled and badly mismanaged.
66. I challenge the Palace to provide Ndi Nnobi the proof to support the vain claim in **Paragraph 7.06** of His Highness' response that: "**The sponsorship grant from the MTN has regularly been paid over to Nnobi Asha-Olu Committee appointed by the N.W.O.**" It is also not true that "**the Igwe has been personally funding the Asha-Olu Festival through the Asha-Olu Committee.**" The claim too that that the Asha-Olu Committee is still owing the Igwe-in-Council over **N800,000** for Asha-Olu Festival of 2011 has nothing to do with the current N.W.O. administration, neither do we know the circumstances giving rise to such suspicious claim. Is the Igwe-in-Council Nnobi now a moneylender? I also challenge the Igwe Nnobi to provide proof that the Asha-Olu Committee is owing the Igwe-in-Council such money as claimed.
67. The claim by His Highness in **Paragraph 7.07** of his response that "**the 2019 Asha-Olu fund, including the MTN sponsorship fund**" was paid into the PG's UBA Bank Account is the very height of treacherous falsehood orchestrated from the Palace, and only aimed at giving a good dog a bad name in order to hang it. **Barr. Okpala Dominic Savio** was not the PG Nnobi in **2019**, and one wondered how he could have paid the 2019 Asha-Olu funds into his personal UBA account. The N.W.O. did not give a cent to my Committee in 2019, neither did the PG had any UBA account at the time. Let the Igwe Nnobi and the Palace handlers provide the proof. Nevertheless, the PG owe Ndi Nnobi a sacred duty to expose the truth always.
68. For the avoidance of any iota of doubt, the **2019 Asha-Olu Festival** was anchored by **Dr. Pat Mbanefo** as Co-ordinator, **Barr. Okpala Dominic Savio** as Chairman, and with **Chief Okwy Umenze (CEO, Lovebite Bread)** as member along with many other distinguished personalities in Nnobi.
69. The N.W.O. did not give the 2019 Asha-Olu Committee under my chairmanship a dime. Although **Late Edokobi Ofofile** promised my Committee **N1,000,000 (One Million Naira Only)** as seed money, he soon fell ill. When we approached **Chief Felix Onwuka, his then DPG**, he swore with all the versions of the holy book at his disposal that the N.W.O. was broke, a political weapon and gimmick at the time to make sure he frustrated the PG, who they perceived at the time was likely to contest the PG of the

N.W.O., and pose a big stumbling block to **Chief Felix Onwuka's** ambition to become the **PG Nnobi**.

- 70.** My Committee later approached the **Abalukwu Elites' Forum (AEF)** who graciously gave us a repayable loan of **N1, 000,000 (One Million Naira Only)**. The loan was guaranteed by **Barr. Andy Uzuagu** with a solemn promise to repay the monies to the AEF when the Town Union finances improved. Like or hate them, the AEF played pivotal role in the huge success recorded in the 2019 edition of the Nnobi Asha-Olu Festival.
- 71.** Armed with the fund, my Committee blazed the trail by opening an innovative **Nnobi Asha-Olu Festival Account** dedicated solely for Asha-Olu Festivals in Nnobi for all times. The Account belonged to Ndi Nnobi under the custody of the N.W.O. The cheap narrative from the Palace that the Account belonged to the PG is consistent with the trademark of the Palace to discredit, disparage and portray the PG in bad light due to their inability to access easy funds during his chairmanship of the 2019 Asha-Olu Festival, and currently under his presidency of the N.W.O.
- 72.** The first signatories to the 2019 Nnobi Asha-Olu Festival Account included **Dr. Pat Mbanefo, Chief Okwy Umenze, Mrs. Grace Ugoigwe (the immediate past Woman Community Leader) and Barr. Okpala Dominic Savio**. The idea was to create a permanent Asha-Olu Account for Nnobi, so that every year there would be merely change of signatories, and the Account inherited by the new Asha-Olu Festival Committee to be constituted.

The MTN grant for that year was paid into the Account. We successfully executed the Asha-Olu Festival and paid out every single cheque. But instead of frivolously spending the remaining money in the Account and waiting on the N.W.O. to reimburse the AEF, my Committee went ahead and paid back the **N1,000,000 (One Million Naira Only) loan to AEF, and still left a modest balance of over N500,000 (Five Hundred Thousand Naira Only) in the Account.**

- 73.** When the CTC government was constituted in **2020**, we dutifully handed over the Account and the cheque book to them after accounting for every kobo spent. When **Chief Charley Paul Obidike** became the Chairman of Asha-Olu Festival in 2020, it became clear to the Palace that the MTN grant was no longer accessible to it as a result of the **Nnobi Asha-Olu Festival Account** we opened. They saw through our plot and genuine intention for Ndi Nnobi. The one and only way for the Palace to continue to have access to the MTN grant was to play smart. The MTN annual Asha-Olu grant was hijacked by the Palace. **Chief Charley Paul** had a story to tell.
- 74.** The Nnobi Asha-Olu Festival Account remained in dormancy for two years between 2019 and 2021 until the CTC handed over administration to the PG. The copy of the cheque bearing the name of the Igwe Nnobi as payee is attached as **Annexure 15**.

75. In **2022**, my administration reactivated the Asha-Olu Festival Account and made out a cheque of **N200,000 (Two Hundred Thousand Naira Only)** as seed money to **Okpala Nnobi** who was the Chairman of Asha-Olu Committee for the year 2022. The money was later paid into the account of Igwe Nnobi by **Chief Edwin Nwabugwu (Dike Udo)** who physically collected the cheque. The balance on the Account was more than **N300,000**.
76. In **2023**, my administration once again gave out a cheque of **N300,000 (Three Hundred Thousand Naira Only)** as seed money to **Chief Nduka Ibenwelu (Akuamia)** from the same Account. The inability of the Palace to also hijack the Nnobi Asha-Olu Festival Account gave rise to the current blackmail and travails of the PG.
77. The claim that the Nnobi Asha-Olu Festival Account is the personal Account of the PG is therefore very puerile, and indicative of how morally low the Palace could condescend to besmear the good name of just anyone standing in its way to pick the crumbs from under the table.
78. Some of the claims in **Paragraph 7.08** are not within my personal knowledge. The Nnobi Town Constitution provides in **Section 108 (2)** that **"the Nnobi Community shall bear the responsibility for the expenses of any Ofala Festival held once in every three years."** It is not within my personal knowledge how Ndi Nnobi have complied in the past with this constitutional provision. But it is authoritative that the Nnobi Community raised multiple millions of Naira for the celebration of the **2023 Asha-Olu Festival**. The constitutional provision did not say it is the duty of the N.W.O. to celebrate the Ofala festival for the Igwe Nnobi, but that of Nnobi Community. What it simply means is that the Town Union will galvanize and mobilize Ndi Nnobi both at home and in the diaspora for the celebration.
79. However, **Section 108 (4)** is very clear. It states:

"The proceeds including cash and other materials donated pursuant to the Ofala Festival aforementioned shall be shared into three portions. While the N.W.O. takes 1/3 of the proceeds, 1/3 to the Igwe-in-Council and the remaining 1/3 shall exclusively be reserved for the Igwe of Nnobi."

This constitutional provision is very clear. The 2023 Ofala Festival as far as history beckons was fully funded by the Nnobi Community, and are therefore entitled to 1/3 of the proceeds. The N.W.O. on behalf of Ndi Nnobi had written a letter to the Palace dated **12th January, 2023** over this issue without any official response till date.
The body language of the Palace shows its unwillingness to share the **2023 Ofala proceeds** as provided for under the Nnobi Town Constitution. The letter dated **12th January, 2023** attached as **Annexure 16**.
80. Regarding **Paragraph 10.1** of the response, the PG maintains that the persistent reluctance and/or refusal of the Palace to consult timeously with the N.W.O. on the name of the special title nominee, his pedigree and the name of the title to be conferred on the aspirant to enable the Town Union

run some background checks is attributable to the uncertainty and what appears as a brewing crisis we have today over the issue. I maintain that the CEC was not informed about the titular name to be given to the last special title awardee before his clearance. I remember vividly that **Dr. Pat Mbanefo** publicly asked about the titular name, but we had no information from the Palace. However, because of the pedigree of the recipient, and the need not to avert a confrontational posture with the Palace once again, the like that played out during the 2023 Ofala celebration, the PG used his discretion and diplomacy to navigate round the issue and cleared the conferree to the admiration of Ndi Nnobi. The claim today from the Palace that the PG is opposed to the title given to the awardee who hails from Ebenesi, is nothing but cheap blackmail to whip up quarter sentiment and to spite the PG for giving the Igwe Nnobi a soft landing and clearing the nominee. On the contrary, the PG should be given accolades for standing up for what is right. The PG is perfectly in one piece with his brother from Ebenesi.

81. The PG is also flabbergasted at the unbelievable claim or suggestion that the Palace may not have comprehensive records of titular conferees from Nnobi and beyond and the designation of titles conferred on them. The assertion, if substantiated, is amazing. **Section 142 (5)** of the town Constitution enjoins the Igwe Nnobi to " **maintain a list of special titles other than the Ozo title, and Honour names which may be conferred on citizens and non-citizens deserving them.**" If this mandatory constitutional Injunction was religiously adhered to, the controversies surrounding the recent conferment of titles would not have arisen. But as long as the money to buy the titles kept coming, the Palace was unperturbed about the backlash effect of not following the laid down due processes or the double-check of its titular archives.
82. **Paragraph 11.1** of the response is futile and of no moment. **Section 20** of the Constitution is unambiguous. The Section does not mandate the CEC to send any formal invitation or agenda to the Igwe. If it is done, it is a matter of courtesy. I challenge the Palace to supply the constitutional provision that compels the CEC or the ARGGM to officially write Igwe Nnobi on the holding of the ARGGM and accompanying same with the agenda of the meeting. It is tantamount to abdication of constitutional responsibility to officially invite the Igwe Nnobi to perform a constitutional duty required of him under the town Constitution.

There is simply no such provision anywhere in the Nnobi Town Constitution and the PG challenges the Palace to bring such provision to the attention of Ndi Nnobi. **Section 56** of the 2011 Constitution is very clear on the procedure for the meetings of the CEC. There is no special procedure provided by the town constitution for the ARGGM. The Palace cannot import into our Constitution that which is not there. This is the kind of presumptuous but unsubstantiated narratives from the Palace that have held down our Community for decades.

83. I do not wish to join issues with the grandstanding of the Palace over the issue of protocols in **Paragraph 12.1** of the response. The people of Nnobi know better. I have never seen a Protocol Officer directing native colanut for Igwe Nnobi in an occasion where he is present. Ndi Nnobi can read in between the lines. The PG is unfazed whether or not he is presented with any colanut on august occasions or not. It is much more honorable that the kolanuts be used to appease the gods of our land for their anger which we are heaping on ourselves.
84. I am not in the least surprised at the gargantuan allegations against the PG in **Paragraph 13.4** of the response. It fell on all fours with the practised and well-rehearsed posture of the Palace. The truth however is that the Igwe Nnobi is heaping the blames of his premeditated inaction on the PG in order to sacrifice him. The gods of the land are watching all of us. Let it however be known that the Igwe Nnobi has never convened much less requested the PG to summon a Security meeting in Nnobi. I am sure that if the Palace has the slightest piece of formal or recorded evidence against the PG in this regard, they would have called for his head.
85. The claim too that the Council Chairperson has resolved the crisis in the market, and the refusal of the PG to abide by same only confirmed the suspicion we have been nursing recently through the prism, that the Local Government Council Chairperson has truly become the appendage of the Palace and a disguised member of the Igwe-in-Council, Nnobi. No wonder she was recently conferred with an honorary title by the Palace to place her in good stead as the attack dog of the Palace to ward off its perceived enemies. It is also certain that the TC Chairperson is spinning everything in the works to hurry the PG out of office and to quickly re-instate their " **annointed son**" in **Chief Felix Onwuka** so that it would become business as usual.
86. On the claims in **Paragraph 14.1**, let me make it abundantly clear that the official intention of the ANSG in setting up the **Truth, Justice and Peace Commission** was to address cases of insurgency, insecurity and unresolved murders and other criminalities in Communities in Anambra State. Instead of the Palace to address these issues headlong as it affected Nnobi Community during our worst nightmares of insecurity, the Igwe Nnobi saw it as a veritable opportunity to canvass for the re-instatement and revalidation of the annulled and illegitimate mandate of **Chief Felix Onwuka**, who followed him to Awka metaphorically like a tethered goat for sale.
87. The Nnobi session at the **Truth, Justice and Peace Commission** at Awka was nothing but a nauseating embarrassment for Nnobi Community. **Martin Okeke** who made presentation on behalf of the Palace spoke a great deal of nothing, very undiplomatic, unprofessional and unrefined in berating the ANSG for setting up the Nnobi Caretaker Committee, and mindlessly canvassed the immediate re-instatement of **Chief Felix Onwuka** as PG as if he had never had any legal background all his life, while simultaneously oblivious of the fact that he remained part of the legal team in the High

Court, Awka, struggling to resurrect the decayed tenure of **Chief Onwuka** from the grave.

Martin Okeke was also at his wits end as he struggled aimlessly to persuade the Commission to deal decisively with the PG and his officers who had the mandate of the CEC to solve an intractable leadership crisis in Afor Market. The Palace and Umu Awuda had a fixed but largely unfounded mindset planted into them by the enemies of this administration, that the PG and his officers wanted to remove **Chief Ezeoke Maduabuchi** as the Afor Nnobi Market Chairman. That was the whole politics and grand conspiracy behind the arrest and detention of the officers of the N.W.O. in cahoots with the DPO, Nnobi, the TC Chairman, ASMATA Chairman and the Afor Nnobi Market Chairman, while heaping a deluge of unfounded allegations against the PG to masquerade their real objectives.

88. At the end of their drowsy and boring presentation, the Commission Chairman summarily ruled the Palace team out of order and jurisdiction. The Commission restated and re-asserted its mandate clearly and warned that it lacked the jurisdiction to dabble into local politics, especially so, the one that was subject of litigation in the court of law. Our revered King came home with his entourage disappointed. But the Nnobi Community had been unnecessarily and avoidably ridiculed.

89. But let us even pause for a second and inquire into the reason behind the invitation of **Chief Felix Onwuka** by the Palace to accompany it at the **Truth, Justice and Peace Commission** at Awka. What purpose was the presence of **Chief Onwuka** meant to serve at the Commission's sitting? **Section 114 (11)** of the Nnobi Town Constitution provides:

" In any of his official engagements or appearances, the Igwe Nnobi shall be accompanied by some members of his cabinet. Provided that in emergency situation, the Igwe of Nnobi may go with any number of members of his cabinet."

It is important to observe the following:

- a. The Igwe Nnobi attended the Commission accompanied by **Ichie Ezeobi, Chief Felix Onwuka and Mr. Martin Okeke.** **Chief Felix Onwuka and Martin Okeke** are not members of the Igwe's cabinet, so the presence of the duo at the Commission was a deep embarrassment to the Igwe-in-Council in particular and the Nnobi Community in general.
- b. Reading **Section 114 (11)** in between the lines suggest that under no circumstance would the Igwe Nnobi attend an official function with any less than two cabinet members including an emergency. The visit at the Commission by the Palace was by no means an emergency. It was well prepared and rehearsed, hence a nicely packaged speech aimed at reclaiming the lost and illegal mandate of **Chief Onwuka**, but regrettably lacking the requisite fundamental locus.

- c. For the Igwe Nnobi to have attended the Commission with just one cabinet member is, to put it quite mildly, a serious violation of the Nnobi Town Constitution, and a diminution of our hallowed traditional institution for which he is the custodian. One only needs to watch the pomp and pageantry that usually greeted the official outings of the Obi of Onitsha and other traditional institutions around us to appreciate the point being made.
- d. The presence of **Chief Felix Onwuka** at the Commission at the invitation of the Palace, is an indication that he probably mistakenly forgot something precious at the N.W.O. Presidency, which they are throwing in everything imaginable, fair or foul, to repossess.

90. **Paragraph 14.3** is an issue that is at best left for Ndi Nnobi. **Eze ekwulu onwe ya!** At the nick of time, those who are well versed on this subject matter will speak. The morning holds the day. All that need be said here over the tenure of the current executives of the N.W.O. is that the Anambra State Government swore in the current executive of N.W.O. on **31st December, 2021** with a clear four year mandate that would lapse on **31st December, 2025**. The **Certificate of Recognition** dated **13th January, 2022** is attached as **Annexure 17**.

91. At the risk of over flogging an issue that I consider stone dead on arrival and the familiar mischief from the Palace, I am minded to remind Ndi Nnobi as follows:

- i. That the four year tenure of Awuda quarter under **Zone C** of the rotational system of administration in Nnobi, was truncated and aborted from running its full course by forces from the Palace, when **Chief Felix Onwuka** from Ebenesi was imposed on Umu Awuda to complete their full four year tenure in the dying days of 2019 following the passage of **Late Dr. Ofodile**.
- ii. That that singular ill-thought out political miscalculation set up a constitutional disorder of our smooth running rotational zoning arrangement.
- iii. That the failure of the **Akukalia-Palace-teleguided** administration to refrain from conducting a mockery of an election on **31st December, 2019** without complying with the Anambra State Guidelines on the conduct of town union elections in the State, further disorganized our constitutional zoning arrangement.
- iv. That the advent of the **Nnobi Caretaker Committee** was a necessary component and consequence of the desperation of the Palace to force **Chief Onwuka** down the throat of Ebenesi in particular and Ndi Nnobi at large, and therefore an imposition on Ndi Nnobi by the Palace, not otherwise from the Anambra State Government as wrongfully claimed by the Palace and parroted by

brainwashed praise singers. The Palace fell into the plot it laid down for others and was entrapped.

- v. That by necessary implication, the Palace mastermind a Palace coup d'état against Ndi Ebenesi from seamlessly beginning their four year full tenure under **Zone A** of the rotational system on **31st December, 2019**.
- vi. That Ebenesi quarter never presented nor had any hand in the presentation or choice of **Chief Chris Ezeani** as the **Chairman of the Nnobi Caretaker Committee**, or indeed any member of the Caretaker Committee from Ebenesi for that matter, neither was Ebenesi quarter consulted before the appointment was made.
- vii. That the **Nnobi Caretaker Committee** is alien to and unknown to the Nnobi Town Constitution as an elective office or position which Ndi Nnobi can aspire to, and which shall rotate in a zoning arrangement.
- viii. That no candidate in Ebenesi Quarter or Nnobi Community for that matter ever knowingly presented himself or offered himself to Ndi Nnobi for purposes of campaign as a candidate for the Nnobi Caretaker Committee.
- ix. That no election was ever conducted in Ebenesi Quarter, or in any part of Nnobi for that matter, for the purpose of selecting candidates or officers of the Nnobi Caretaker Committee.
- x. That the emergence of **Chief Chris Ezeani** as the CTC Chairman was an irony of fate and a *force majeure (act of God)* which no human ingenuity could have contemplated, except there's something the Palace knew that we did not know.
- xi. That **Section 82 (1)** of the Nnobi Town Constitution provides in no uncertain terms:

" Officers of the N.W.O. shall be elected once in every four years and election into offices shall be based on the ideals of the zoning system as provided for under Section 60 of this Constitution."
- xii. That the setting up of the Nnobi Caretaker Committee **was not an election as contemplated by section 82, but a child of necessity** occasioned by the over speed and desperation of the Palace that it was either **Chief Onwuka** or nothing.
- xiii. That **Section 82 (2)** of the town Constitution is unequivocal that:

" The election of officers of the N.W.O. shall take place at the Quadrennial Conference of Nnobi People."
- xiv. That the setting up of the Nnobi Caretaker Committee on **3rd July, 2020** by the Anambra State Government was not in a Quadrennial Conference of Nnobi People. The Quadrennial Conference of Nnobi People was never convened for the purpose of election of officers into the Nnobi Caretaker Committee.
- xv. That under **Section 62** of the 2011 Constitution, **" the rotationary offices under Section 60 last for a period of four (4) years for each zone."** Accordingly, the Nnobi Caretaker

Committee is not a rotational office under the town Constitution, and never in fact rotated amongst the quarters in its lifetime in Nnobi.

- xvi. That what would have passed as the last Quadrennial Conference of Nnobi People for purposes of election on **31st December, 2019**, was truncated from and by the Palace in the blinding desperation to install **Chief Onwuka Felix** in office willy-nilly.
- xvii. That **Section 82 (3)** of the Constitution provides that "**Each zone shall nominate for approval all offices zoned to it.**"
- xviii. That I challenge the Igwe Nnobi and the Palace handlers to provide documentary proof of the letter from the Anambra State Government requesting the three quarter leaderships in Nnobi to nominate their candidates for offices in the Nnobi Caretaker Committee.
- xix. That accordingly no right thinking person no matter how highly placed, except for pure mischief or vaulting ambition, could configure the illegal days spent by **Chief Onwuka** between **31st December, 2019 and 29th June, 2020** when he was booted out of office as part of the uninterrupted tenure of Ndi Ebenesi under **Zone A** in the rotational zoning arrangement contemplated under **Section 60** of the 2011 Town Constitution.
- xx. That similarly, it is deliberately courting and sponsoring unnecessary and avoidable constitutional chaos, for the Igwe Nnobi to propagate, much less disseminate the idea that the period of the **Nnobi Caretaker Committee** should be factored into the uninterrupted tenure of Ebenesi quarter under the rotational zoning arrangement.
- xxi. That neither **Barr. Okpala Dominic Savio** nor any member of his Exco was a member of the defunct Nnobi Caretaker Committee.
- xxii. That the tenure of any administration in Nnobi or elsewhere under the Constitution begins to run from the date of swearing in of the members of the executive, and not on the whims or caprices or subjective predilections of an emperor. **See the case of Peter Obi Vs. Andy Ubah.**
- xxiii. That the tenure of the **Barr. Okpala Dominic Savio** administration commenced on **31st December, 2021** with a clear-cut four year uninterrupted tenure that will eclipse on **31st December, 2025**. That the said **31st December, 2021** date of swearing in of this administration itself, was strictly speaking a **Quadrennial Conference of Nnobi People** for purposes of election of officers of the N.W.O. in line with **Sections 33 (1)(a) and 82 (2)** of the 2011 Constitution. **See the Certificate of Recognition dated 13th January, 2022**. Elections are conducted in a Quadrennial Conference, not in the ARGM.
- xxiv. That the next Quadrennial Conference of Nnobi People may hold on **31st December, 2023** in line with **Sections 33 (1)(a) and 82 (2)** of the town Constitution, but without the election of officers

of the N.W.O. as one of the items on the agenda. To do otherwise, would once again interrupt and torpedo the smooth streaming of the **Barr. Okpala led** administration, and orchestrating a new round of constitutional brou-haha sponsored from the Palace.

- xxv. In the alternative, Ndi Nnobi are *ad libitum* to designate the oncoming **31st December, 2023** meeting as an **ARGM** (except if the review of the **2023 Constitution** is on the agenda). In the event of that scenario playing out, then naturally, the next Quadrennial Conference of Nnobi People will hold on **31st December, 2025** to synchronize with the terminal date of the current administration, and the conduct of a fresh election under **Zone B** of the rotational zoning arrangement. That would also automatically reset the constitutional disorder in which we found ourselves, and occasioned by the inordinate ambition of **Chief Felix Onwuka** and ably goaded by the Palace.
- xxvi. That the Nnobi Caretaker Committee is not a Town Union within the contemplation of the Law setting it up under **Section 26 and 27 of the Fund For Rural Development Law, Cap. 54, Revised Laws of Anambra State, 1991**. On the contrary, the election of officers and the tenure of four years is with regard to a Town Union contemplated under the Nnobi Town Constitution.
- xxvii. Finally, I could scarcely hide my disappointment and exasperation on **9th October, 2023**, when I visited the Palace, and humbly requested the Igwe Nnobi, in the presence of a Special title holder from Ebenesi, if he was truly behind the rumour mill making the rounds, that the tenure of the current crop of officers of the N.W.O. would terminate on **31st December, 2023**. Incredibly, His Highness, the Igwe Nnobi, answered in the affirmative.
- xxviii. That the unabashed position of the Palace is an affirmation that the Palace is openly at war with the Anambra State Government and working at cross purposes with it over the Government's wisdom in setting up the Nnobi Caretaker Committee which returned peace back to Nnobi.

92. On the allegations of corrupt enrichment and embezzlement, the PG

would have gladly responded to the allegations point by point in this treatise, but will be hesitant to do so here for the following reasons:

- i. The Igwe Nnobi is not an external Auditor of the N.W.O. under **Section 73** of the town Constitution, has not been appointed as one, and cannot therefore constitute himself as such.
- ii. The Igwe Nnobi is not a member of the Board of Trustees of the N.W.O. under **Section 78 (d)** charged with the duty to oversee that all withdrawals from the N.W.O. bank accounts are correct.
- iii. The Igwe Nnobi is not a member of the **CEC, ARGM** and the **QC** under **Sections 36, 22 and 31** of the town Constitution respectively, and therefore cannot meddle into the affairs of the N.W.O.

iv. As the Patron of the N.W.O., the Igwe Nnobi lacks the requisite powers under **Section 20** of the town Constitution to purport to act for and on behalf of the N.W.O. In the matter of the N.W.O. account. In **Suit No. FHC/ E/27/95: H.R.H. IGWE F.O. EZEOKOLI 11, IGWE NNOBI VS. NNOBI COMMUNITY BANK LTD. & ORS: Held:**

" Simply put, the fact that the Trustees of N.W.O. were irregularly appointed, does not clothe the 1st plaintiff (Igwe Nnobi) as the Patron of N.W.O. with the legal right to represent the organization.... And unless he is appointed at the General Meeting of the organization, the 1st plaintiff has no right to act for and on behalf of N.W.O."

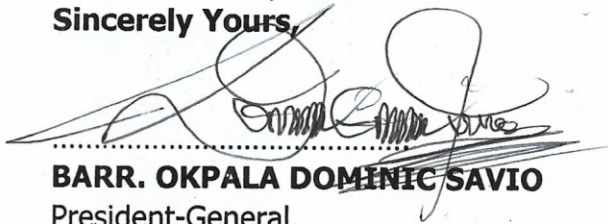
- v. The Igwe Nnobi as father of all, must first humbly remove the log in his own eyes before removing the speck in another's. It will be remarkable, desirable and leadership by example, if the Igwe Nnobi should for once publish the Account Statement of the Igwe-in-Council to Council members and Ndi Nnobi for scrutiny, before interfering with and probing the published account statement of the N.W.O., and constituting himself into a self-appointed Auditor.
- vi. The Palace should also tell Ndi Nnobi if the Account of the Igwe-in-Council had ever been audited or subjected to scrutiny at least since the year **2008** and by who.
- vii. The Palace should also put Ndi Nnobi in the know if it is a good accounting practice, and meets international best practices for the only two principal signatories to the Igwe-in- Council Account to come from Awuda Quarter, and excluding other Quarters in the Council.

- 93. Notwithstanding the above, the PG and his team will at the appropriate time, circumstances and forum react to the issues raised in the Account Statement to the satisfaction of all and sundry.
- 94. The PG however regrets the orchestrated attempt from the Palace to besmear and tarnish the hard built reputation of our own **SPAD, Dr. Nelson Omenugha**, over a mere paltry wedding gift the officers of N.W.O. presented him which was erroneously reported in our financial statement as "**wedding suit**" due to regrettable typographical error. I am very much aware that the imported wedding suit alone of our well respected **SPAD** cost him **N500,000 (Five Hundred Thousand Naira Only)**. The Palace will stop at nothing at character assassination as its hallmark. My most sincere apologies to my dear friend and ally.
- 95. **To conclude**, I humbly plead with the Honorable Commissioner to prevail on the Igwe Nnobi to give peace a chance in Nnobi, and allow the PG to perform his constitutionally assigned duties to serve Ndi Nnobi seamlessly, and without further interference and poking from the Palace. This, he can

effortlessly do by religiously and genuinely upholding the provisions of the Nnobi Town Constitution, 2011 and the Anambra Traditional Rulers' Law, and respecting the deliberate dichotomy and boundaries between the traditional institution and town union administration.

This is the simplest recipe for true and sustainable peace and development in Nnobi Community. The contrary is interminable and unending conflicts, which unfortunately, it appears the Palace truly and mindlessly enjoys, while Ndi Nnobi languish in agony and pains of underdevelopment.

Sincerely Yours,



BARR. OKPALA DOMINIC SAVIO

President-General,
Nnobi Community.

Cc.

1. The Commissioner of Police, Anambra State.
2. The Commissioner For Homelands, Awka.
3. The DSS, Ojoto.
4. The National President, ASATU
5. The C.E.C. of N.W.O.
6. The Transition Chairman, Idemili South L.G.C.
7. HRH. Igwe (Engr.) Nick M. Obi
8. The DPO, Nnobi
9. Chairman, Ebenesi Quarter
10. Chairman, Ngo Quarter
11. Chairman, Awuda Quarter
12. The Igwe-in-council, Nnobi
13. National President, Nze na Ozo, Nnobi
14. The Secretary, Federation of Age Grades, Nnobi
15. The Youth Leader, Nnobi
16. The Woman Leader, Nnobi