

29 August 2014

Dr. Bem Angwe, Executive Secretary
National Human Rights Commission
19 Aguiyi Ironsi Street
Maitama, Abuja
Federal Capital Territory
Nigeria



Dear Prof. Angwe:

RE: SUPPLEMENTARY SUBMISSION TO THE URGENT PRAYER FOR INTERIM MEASURES AND CALL FOR IMMEDIATE ACTION BY THE NATIONAL HUMAN RIGHTS COMMISSION IN THE ONGOING VIOLENCE BY THE OLOTO CHIEFTAINCY FAMILY AGAINST MR. MUSBAU ISHOLA AGBODEMU & OTHERS OF OTTO ILLOGBO COMMUNITY, EBUTE METTA (WEST), LAGOS

We write urgently on behalf of Mr. Musbau Ishola Agbodemu and other members of Otto Ilogbo community, Ebute Metta (West), Lagos, who submitted a Complaint to the National Human Rights Commission (Commission) on 8 May 2014.

We write regarding an attack on the life of Mr. Agbodemu that occurred on 17 August 2014 and the resumption of violence and demolition by fire of countless structures in the Otto Ilogbo community from 18-20 August 2014. At present, Mr. Agbodemu remains hospitalized after suffering a knife wound to the stomach, while most residents of the Otto Ilogbo community have fled the violence and sought other places of refuge that destroyed many homes, businesses and properties. At least two innocent community members were killed in the violence on 19 August.

The Complainants believe that the attack his life and ongoing arson and violence are being instigated by the Oloto Chieftaincy Family, in order to take over the land at Otto Ilogbo. Indeed, at least four of the men who attacked Mr. Agbodemu on 17 August 2014 were the same men who were amongst those who demolished his structure, beat him, and attempted to kidnap him on 22 April 2014.

Due to the urgency of this matter, we respectfully pray for the Executive Secretary of the Commission to exercise its powers to issue interim protection measures pursuant to Order 67 of the Commission's Standing Orders and Rules of Procedure 2013 on behalf of Mr. Agbodemu and others members of Otto Ilogbo community.

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As further detailed in the attached Further Submissions in Support of Urgent Request for Interim Measures to Protect Complainants against Irreparable Harm, the Complainants seek the Commission's assistance in ensuring prompt and diligent police investigation into the attacks of 17-20 August 2014, in promptly serving process on the Respondents to make them aware of the complaint presently under consideration by the Commission, an interim order of injunction against further attacks on Mr. Agbodemu and the Otto Illogbo community and any acts aimed at taking over the land at Otto Illogbo, as well as an immediate hearing of the underlying 7 May 2014 Complaint. We further note that the Complainants remain open to the possibility of mediation of their Complaint, but rely on the Commission as a strong and independent third party neutral in any such mediation.

Thank you for your urgent attention to this important matter.

Sincerely,



Megan S. Chapman
Co-Director

Cc: Tony Ojukwu, Esq.
Registrar, Public Inquiry on Forced Evictions & Demolitions
National Human Rights Commission

Complainant's Service Address:

Comrade Musbau Ishola Agbodemu
(on behalf of himself and other members of Otto Illogbo community)
c/o Justice & Empowerment Initiatives
1b Onueza Close, off Nzimiro Street
Port Harcourt, Rivers

Respondent's Service Address:

Chief Dosunmu, Lisa of Oloto
(for the Oloto Chieftaincy Family)
38 Ogundimu Street
Ebute Metta, Lagos

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NATIONAL HUMAN RIGHTS COMMISSION

COMPLAINT NO. _____

AGBODEMU ISHOLA MUSBAU
RASHIDI LIAMEED
MORUFU AFOLABI
ISHOLA ABOSEDE
SAMSON ISHOLA
MARIAM ISHOLA
IBRAHIM ISHOLA



COMPLAINANTS

v.

CHIEF DOSUNMU OLOTO, LISA OLOTO OF OTTO
LUKMON DOSUNMU OLOTO
BABATUNDE ODESANYA OLOTO
ASP ADEGOKE, IPONRI POLICE STATION
DIVISIONAL CRIME OFFICER (former)



RESPONDENTS

IN THE MATTER OF

FORCED EVICTION, DEMOLITION, VIOLENCE, AND WRONGFUL
ARREST PERPETRATED BY THE OLOTO CHIEFTAINCY FAMILY AND
LAGOS STATE POLICE AGAINST MR. MUSBAU ISHOLA AGBODEMU OF
OTTO ILOGBO COMMUNITY, EBUTE METTA, LAGOS

FURTHER SUBMISSIONS IN SUPPORT OF URGENT REQUEST FOR INTERIM MEASURES TO PROTECT COMPLAINANTS AGAINST IRREPARABLE HARM

*FILED PURSUANT TO ORDER 67 OF THE STANDING ORDERS AND RULES OF PROCEDURE OF THE
NATIONAL HUMAN RIGHTS COMMISSION, 2013, AND SECTION 5(J) OF THE NATIONAL HUMAN
RIGHTS COMMISSION ACT, 1995 (AS AMENDED)*

We write urgently on behalf of Mr. Musbau Ishola Agbodemu of Otto Ilogbo community, Ebute Metta, Lagos, affected by the forced eviction, demolition, violence, and wrongful arrest that is the subject of the above-referenced complaint.

On 8 May 2014, Complainants submitted a Complaint (using Form 1) along with an Urgent Request for Interim Measures to this Honourable Commission, noting that the ongoing threat to Mr. Agbodemu, the destruction of Complainants' homes in Otto Ilogbo, and the failure by local police to adequately investigate and respond to the matter is causing irreparable harm to the lives and properties Complainants sought to protect in approaching this Honourable Commission. This Urgent Request was filed pursuant to Order 67 of the Standing Orders and Rules of Procedure of the National Human Rights Commission, 2013 (hereinafter 'the Rules') and Section 5(j) of the National Human Rights Commission Act, 1995 (as amended).

On 17 August 2014, Mr. Agbodemu was again attacked by the 2nd Respondent and other agents of the 1st Respondent, this time suffering life threatening injury, to wit a knife wound to the stomach deep and long enough to expose his intestines.

On the day in question, Mr. Agbodemu was resting at the house of Complainant Rasheed Liameed. A group of young men rushed into the community and came straight to Mr. Liameed's house. They began beating on the fence of the house opposite until Mr. Agbodemu came out of the house to see what was happening. Immediately they attacked with a variety of weapons, but it was a knife that succeeded in slashing his stomach before they rushed away. Among the attackers, Mr Agbodemu recognized one Mr. Lukmon Dosunmu (the second Respondent) and three others who were amongst those responsible for the 22 April demolition and attack on Mr. Agbodemu's person and property. See Further Witness Statement of Agbodemu Ishola Musbau dated 28 August 2014.

When the attackers left, Mr. Agbodemu discovered he was covered with blood and his intestines coming out of the deep wound. He was able to push them back in and hold the wound shut. Luckily for him, Mr. Liameed, both of their wives, Mr. Agbodemu's son and a colleague were on hand to assist in transporting him to a local health clinic where he received urgent attention. Because of fears that he would be targeted for a subsequent attack, Mr. Agbodemu was subsequently transferred to a hospital elsewhere in Lagos. See **Exhibits A-B**.

On 26 August, strange men were seen around the hospital where Mr. Agbodemu was still recovering, raising alarm that his location had been discovered and that he would be attacked again. As a consequence, on 27 August, he was moved again to another hospital where he remains today. His location is being kept secret for fear of further attacks. His family is now squatting with relatives elsewhere for their safety; however, once he recovers, they will want to return home to Otto Illogbo.

Just two days after the attack on Mr. Agbodemu, a gang of Otto boys attacked Otto Illogbo, setting structures on fire with petrol and then blocking the fire squad from coming to put the fire out, rendering hundreds homeless; fighting and violence resulted in the deaths of at least two innocent community members and the violence has forced many families in the community to flee. Mr. Agbodemu reported this attack, the arson, and the violence to the State CID on 20 August 2014. See **Exhibits D, E, F**, and Witness Statement of Kayode Omolabi.

We respectfully submit that this Honourable Commission has the power to intervene, investigate, and adjudicate or mediate this matter pursuant to Section 5(j) of the NHRC Act. Further, the Executive Secretary has the power pursuant to Order

67 of the Standing Orders and Rules of Procedure of the NHRC to issue interim protection measures during the pendency of the Complaint.

Wherefore, the Complainants hereby:

1. Renew their urgent prayer for Interim Protection Measures and final reliefs such as were requested in the original Complaint and Urgent Request for Interim Measures filed on 8 May 2014;
2. Urge that their matter be registered and assigned a Complaint number, investigated, and that the Honourable Commission take steps to set the matter for hearing and/or mediation without further delay; and
3. Humbly request such other Interim Protection Measures as this Honourable Commission should deem necessary to protect the complainants, as well as the community under attack, under the circumstances.

In support of these further submissions, we attach the attached Further Witness Statement of Mr. Agbodemu Ishola Musbau dated 29th August 2014, Witness Statement of Mr. Kayode Omolabi dated 29th August 2014, and Exhibits A-E.

Thank you for your urgent attention to this important matter.

Submitted this 29th day of August 2014



Megan S. Chapman
Justice & Empowerment Initiatives

Submitted to:

Tony Ojukwu, Esq.
Secretary, Public Inquiry on Forced Evictions & Demolitions
National Human Rights Commission

Complainants' Service Address:

c/o Justice & Empowerment Initiatives
1b Onueza Close, off Nzimiro Street
Port Harcourt, Rivers

Respondent's Service Address:

Chief Dosunmu, Lisa of Oloto
(for the Oloto Chieftaincy Family)
38 Ogundimu Street
Ebute Metta, Lagos

NATIONAL HUMAN RIGHTS COMMISSION

COMPLAINT NO. _____

AGBODEMU ISHOLA MUSBAU
RASHIDI LIAMEED
MORUFU AFOLABI
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SAMSON ISHOLA
MARIAM ISHOLA
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COMPLAINANTS

V.

CHIEF DOSUNMU OLOTO, LISA OLOTO OF OTTO
LUKMON DOSUNMU OLOTO
BABATUNDE ODESANYA OLOTO
ASP ADEGOKE, IPONRI POLICE STATION
DIVISIONAL CRIME OFFICER (former)



RESPONDENTS

FURTHER WITNESS STATEMENT OF MR. AGBODEMU ISHOLA MUSBAU

I, Musbau Ishola Agbodemu, Nigerian, Muslim, Male, businessman, of Otto Ilogbo Extension in Ebute Metta, Lagos Mainland Local Government Area, Lagos State, do hereby state as follows:

1. That I am the 1st Complainant in this case and a long-time resident of Otto Ilogbo Extension community as well as the former Community Development Association (CDA) Chairman and the present CDA Secretary.
2. That, by virtue of the above, I am conversant with the facts deposed to herein.
3. That since submitting the above referenced Complaint to this Honorable Commission on 7 May 2014, including a prayer for urgent interim measures of protection, I and the other Complainants have had no response to our submissions nor a date set for hearing.
4. That, nevertheless, we took courage in knowing that this Honourable Commission was hearing our matter and information that the Respondents should be aware of the same.
5. That, consequently, by June 2014, I began to rebuild my structure, which serves as my family's one-room home, a shop for my wife, and a school for children in the community. Slowly, others whose homes had been destroyed in the fire of 2 April 2014 followed suit.
6. That, from time to time, I would hear threats from the Oloto Chieftaincy Family. Due to continued fear, sometimes my family and I would not sleep in our compound, but rather sleep in the house of the CDA Chairman, Rashidi Liameed, who is the 2nd Complainant. His house is made from block and has an external gate, making it more secure than our own.
7. That, in early August 2014, I organized my community to do a community "profiling" exercise to enable us to count structures and households and plan for our development.
8. That, a week following this exercise, I fell ill with a touch of malaria. From Saturday, 16 August, to Sunday, 17 August 2014, I spent time sleeping and resting at the house of the CDA Chairman. Late on Saturday night there were sounds of fighting outside the house and some of the vigilante I work with called me, but I told them I was too weak to come out.

9. That it was only the next day (Sunday, 17 August 2014) when, while resting, I heard strange sounds outside the house. I rose and went out to the front porch of the Chairman's house to see what was happening. Immediately, I saw a group of young men who also saw me and exclaimed, "That's the one we're looking for." They rushed me with many weapons. Amongst them, I recognized Lukmon Dosunmu (the 2nd Respondent and the son of Chief Dosunmu Lisa of Otto, the 1st Respondent) and three other young men who had been amongst those who demolished my home and beat me on 22 April 2014. As soon as they saw my blood, before I even realized I had been hit, the gang rushed away.
10. That I then realized I had received a deep and long knife cut to my gut. Blood was everywhere and my intestines were starting to come out of the wound. I managed to get back inside the house, push the intestines back inside and pinch closed the wound. I called for help. My wife, Mr. Liameed, his wife, and my colleague Rosemary Eyiaroni helped get me from the Chairman's house to a nearby medical clinic where, while unconscious, I was stitched up and received treatment from Dr. Adeolu Olusodo. See attached **Exhibit A** (photograph taken of my wound and intestines on the day of the attack) and **Exhibit B** (letter from Dr. Adeolu Olusodo regarding the wound, my condition and my treatment).
11. That Mr. Liameed later told me and I verily believe that, after dropping me at the clinic, he rushed down to Iponri Police Station to report the attack.
12. That the next day, my friends decided it was not safe for me to remain at the nearby clinic because of the possibility that those who were after me would track me, if they learned I was alive, and attack again. They moved me to another clinic elsewhere in Lagos, trying to keep the location secret, where I continued treatment and rest.
13. That on Tuesday, I started to get frantic phone calls about violence and fire in Otto Illogbo. It was terrible to be down and unable to do anything to help protect my people. The violence reportedly continued for another day and much of the community was destroyed.
14. That later in the week, as I regained some strength, I ensured that the attack was reported to the State CID at Panti to ensure a proper investigation and follow-up that I was not sure would happen at the Iponri Police Station. I submitted a written statement and then the IPO came down to the hospital where I was to make further investigations.
15. That I also had a friend attempted to deliver a copy the same statement to this Honourable Commission's office in Ikeja, but the Commission reportedly refused to accept it.
16. That during the week I was also able to reach out to some media contacts to get publicity of the plight of my people in Otto Illogbo and the attack on me. See **Exhibit C**.
17. That on 26 August 2014, one of the doctors at the hospital where I was reported that he had seen some strange men around the hospital and became suspicious that some of those who were tracking me had found out my whereabouts. On the recommendation of friends and the IPO, I was moved again to a new secret location where final tests are being performed. When I am released from hospital, I still do not know where I will go to remain safe.
18. That I therefore pray for this Honorable Commission to intervene speedily in this matter to protect lives and properties of the Complainants, our families, and other members of Otto Illogbo community. We rely on this Commission to issue urgent interim measures of protection and give a date for hearing our case, or else use its powers to mediate.
19. That I make this statement in good faith and believing the same to be true.

Signed this 29th day of August 2014.

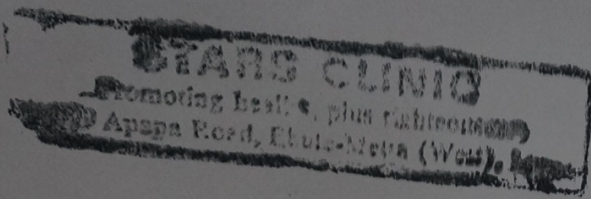


AGBODEMU MUSBAU ISHOLA

Exhibit A. Photograph of my wound and intestines on the day of the attack;
photograph of the stitches one week later







21-8-14.

To whom it may concern,

RE: AKBODEMY ISHOLA MUSBAU.

The above-named was rushed to our clinic on Sunday 17/08/14 in the afternoon with stab injury on the right side of the abdomen. There was considerable bleeding and he was supported to walk.

He was taken to the theatre immediately to be operated on. The intestines were outside of the abdomen and there was bleeding in the abdomen. A laparotomy was done and the abdomen covered with a drain left in-situ.

He is currently recuperating in another hospital.

Thanks

Yours truly,

A handwritten signature in dark ink, appearing to be "Adeolu Olusodo".

DR. ADEOLU OLUSODO.

Exhibit C

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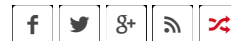


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Shot at, stabbed severally, rights activist survives but ordeal heats up community

by **SEGUN ADIO** on Aug 23, 2014 | **No comments**

Posted under: **Living, ONLINE X-tra**



102

7

2

There is tension in Ebute Meta, after a rights activist was attacked, surviving by whiskers. Members of the community are however restive, accusing its monarch of being mastermind of the assault.

Not a few residents of Ebute Metta of Lagos State, earlier in the week, protested the brutal attack on one of their foremost leaders, Ishola Agbodemu, who was reportedly stabbed severally in the stomach by alleged agents of a monarch in the area.

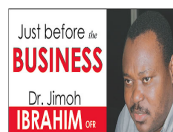
The victim is a renowned human rights crusader and frontline leader of the Rural, Urban Development Initiative (RUDI), a body agitating for resettlement of displaced slum dwellers in the area.

The residents, mainly youths of the area, had probably taken laws into their hands, when they planned to storm the residence of a man said to be behind the ordeal of Agbodemu, but they were prevailed upon by some other elders in the community urging that law enforcement agents should be allowed to handle the matter.

How the former chairman of the Otto- Ilogbo Ifesowapo Community Development Association Chairman (CDA), managed to survive the attack by the thugs would forever remain a miracle in the eyes of those that witnessed the incident.

Eyewitnesses told reporters that after several close gun shots aimed at his chest could not penetrate into his body, the four thugs that carried out the attack reportedly aimed for bottles at a nearby shop and broke them on his head and parts of his body, but still did not have any effect.

It was further gathered that when it was discovered that their victim's body was impenetrable with the objects used on him, one of them reported brought out a curve, red-branded knife hidden in his trousers and tore open Agbodemu's stomach.



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FASHOLA SLASHES LASU FEES



MORE TAXES ON THE WAY TO FILL THE VACUUM

As his stomach was ripped open, some of the intestines gushed out necessitating a prompt response by residents who rushed him to the hospital. The one that reportedly carried out the act was identified as Kashy.

The attack on the community leader reportedly happened on Sunday, August 17, 2014. As if that was not all, two days later, on Tuesday, August 19, 2014, some reported agents of the chief was also at Agbodemu's house, but this time, set it ablaze until the complex was completely reduced to ashes.

Another eyewitness told Saturday Mirror that but for divine intervention, the community leader's wife and kids could have been burnt along with the building.

They were reportedly ferried out of the premises by some neighbours loyal to the injured Agbodemu and kept in an undisclosed safe haven.

It was gathered that Agbodemu, who had been at loggerheads with a monarch in the area over issues of land and resettlement of the people of the area for years now, was reportedly attacked same way in April, this year by suspected agents of the same monarch who was reportedly using one of his chief to perpetrate the act.

On that occasion, there was attempt to kidnap the human rights crusader while a fee-free school he operates for children of the downtrodden in the community was also burnt to ashes. Agbodemu, who is presently recuperating at an undisclosed hospital spoke with Saturday Mirror on phone about his experience in the hands of the paid assailants.

He begins his story, "It was last Sunday, and I was relaxing in the house of the new chairman of the CDA. Suddenly, the Otto boys came out and were chasing residents all over the place. They met the chairman outside the house, but they told him that they did not come for him.

"When I heard the noise and shouts of people around, I rushed outside to see what was happening, by which time the boys were heading for my house. When I came outside I asked 'Who the people are and what is going on'.

They turned back and saw me and said, 'Oh! See who we are looking for. He's here,' and one of them brought out a gun and fired shots at me. I did not know whether there was no bullet in their guns, but all I know was that nothing entered into my body."

A female member of RUDI who was reportedly discussing with the new CDA chairman and who witnessed the whop scenario but who would not want her name in prints, told Saturday Mirror that the knife used on Agbodemu was a special one and laden with charms.

According to her, "It was one man they called Kashy that chook Leader (Agbodemu) with the knife he brought out of his trousers when they realised that the bullets did not enter his body after they had also chook him with bottles all four of them," the lady said as she vowed never to come to Ebute-Metta again, apparently overwhelmed by what she saw.

The attack on the community leader was reported at Iponri Police Station. A police Corporal at the station, who did not want his name in prints, confirmed the story but maintained that the crisis of the community was a recurring decimal and that law enforcements agents were on top of it each time it rears its ugly head.

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NATIONAL HUMAN RIGHTS COMMISSION

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ASP ADEGOKE, IPONRI POLICE STATION
DIVISIONAL CRIME OFFICER (former)



RESPONDENTS

WITNESS STATEMENT OF MR. KAYODE OMOLABI

I, Kayode Omolabi, Nigerian, Muslim, Male, businessman, resident of the area known as Otto Ilogbo Extension in Ebute Metta, Lagos Mainland Local Government Area, Lagos State, do hereby state as follows:

1. That I am a resident of Otto Ilogbo Extension community.
2. That by virtue of the above, I am conversant with the facts deposed to herein.
3. That I moved to Otto Ilogbo in 2012 to live in as a tenant; from the time I moved to the community, I have known Mr. Agbodemu Ishola Musbau as a community leader and a champion of peace and security for the community's residents.
4. That on 2 April 2012, just a couple hours after midnight, a fire broke out in Otto Ilogbo and destroyed more than 30 structures, including Mr. Agbodemu's. My own structure was spared, but hundreds of people were rendered homeless and I witnessed their suffering.
5. That for several weeks thereafter, Mr. Agbodemu and others in the community held off from starting to rebuild because of warnings from the Oloto Chieftaincy Family. This delay multiplied the sufferings of those who were homeless and sleeping in the open.
6. That later in April I heard from Mr. Rasheed Liameed, the CDA Chairman, that Agbodemu had been attacked by the Oloto family and that his structure was demolished and he was beaten. That he and Mr. Liameed and one other man were arrested at Iponri police station and held for some days before they were released.
7. That after this incident, there continued to be threats against Mr. Agbodemu from the Oloto chiefs, but his boldness in rebuilding his own structure allowed others in the community to have the courage to rebuild their structures. Bit-by-bit, the community began to return to how it had been before.
8. That in early August 2014, after much of the reconstruction had taken place, Mr. Agbodemu helped to organize our community to do a community "profiling," counting our structures

and community facilities to help us know ourselves and plan for community development. I was among those who took place in the exercise, which documented a total of 139 structures in the community, including 114 residential, 17 residence-cum-business, 10 businesses, and 7 other community facilities such as schools or churches. We counted a total of 528 households, from which we projected a population of about 3,700 persons.

9. That just a little over a week after this exercise, another person from the community told me on that day (17 August) at about 2pm in the afternoon on the road coming into the community and I verily believe that Mr. Agbodemu had been attacked and wounded with a knife by boys sent by the Oloto in the late afternoon of Sunday, 17 August 2014. All of us in the community heard of the attack and were frightened. We learned Mr. Abodemu was stable, but in a hospital in a secret location for his safety.
10. That two days after the attack, on the morning of Tuesday, 19 August 2014, a group of boys from Otto descended on our community in violence, fighting with youths from our community and using fuel to set fire to so many structures. They blocked the entrances to the community so that no fire squad could enter to put out the fire. We fled for our lives, reaching Otto Bridge where we stood helpless and watched flames engulf our community.
11. That the violence continued for the next couple of days before finally it calmed down.
12. That by that time, most of the community was burnt, save a cluster of structures toward the Jones Street Extension of the community. My own was spared, but many of my properties that were stored with others in the community got burned.
13. That most of us in the community have now fled for fear of further violence. I have visited the community during the day, but I'm sleeping in a motor park somewhere else in Lagos because of fear of violence that may come at night. Those structures that are still intact have been locked up or barricaded by their owners and most people are staying elsewhere or refuse to come out from inside or talk about what happened.
14. That on 27 August 2014, I accompanied three persons from Justice & Empowerment Initiatives (JEI) to visit the community to witness and document the destruction. Attached hereto and marked **Exhibit E** are photographs of what remains of our community.
15. That I fear for the future of my community and for the life of my friend and the protector of our community, Mr. Agbodemu. The police are investigating the matter, but I believe only the arrest of high-level persons responsible for this terror will help to keep the police.
16. That I therefore join others from Otto Ilogbo in praying for this Honorable Commission to investigate this matter, issue interim protection measures and to move swiftly to hold a hearing on this matter or offer to mediate between our community and our oppressors.
17. That I make this statement in good faith and believing the same to be true.

Signed this 29th day of August 2014.



KAYODE OMOLABI

EXHIBIT E. Photographs of destruction at Otto Illogbo taken on 27 August 2014

