

IN THE HIGH COURT OF THE FEDERAL CAPITAL TERRITORY
IN THE ABUJA JUDICIAL DIVISION
HOLDEN AT ABUJA

CHARGE NO: FCT/CR/.....⁴³/2015

BETWEEN

FEDERAL REPUBLIC OF NIGERIA

COMPLAINANT

AND

1. COL. MOHAMMED
SAMBO DASUKI (RTD.)
2. SHUAIBU SALISU
3. AMINU BABA-KUSA
4. ACACIA HOLDINGS LIMITED
5. RELIANCE REFERRAL
HOSPITAL LIMITED

DEFENDANTS

CHARGES

COUNT 1

That you COL. MOHAMMED SAMBO DASUKI (RTD.) whilst being the National Security Adviser and SHUAIBU SALISU whilst being the Director of Finance and Administration in the office of the National Security Adviser, and HON. WARIPAMOWEI DUDAFI (now at large) whilst being Senior Special Assistant, Domestic Affairs to the President, on or about 27th November, 2014 in Abuja, within the jurisdiction of this Honourable Court, entrusted with dominion over certain properties, to wit: the sum of N10, 000, 000, 000 (Ten Billion Naira) being part of the funds in the account of National Security Adviser with the Central Bank of Nigeria (CBN), the equivalent of which sum you received from the Central Bank of Nigeria (CBN) in foreign currencies to wit: \$47,000,000 (Forty Seven Million Dollars) and 5.6 million Euros, committed criminal breach of trust in respect of the said property when you claimed to have distributed same to the People's Democratic Party (PDP) Presidential primary election delegates

and you thereby committed an offence punishable under **Section 315 of the Penal Code Act, Cap 532, Vol. 4, LFN 2004.**

COUNT 2

That you **COL. MOHAMMED SAMBO DASUKI (RTD.)** whilst being the National Security Adviser and **SHUAIBU SALISU** whilst being the Director of Finance and Administration in the office of the National Security Adviser, between **22nd January, 2015** and **19th March, 2015** in Abuja, within the jurisdiction of this Honourable Court, and in such capacities entrusted with dominion over certain property, to wit: an aggregate sum of **N2, 120, 000, 000 (Two Billion, One Hundred and Twenty Million Naira)** which was in the account of the office of the National Security Adviser with the Central Bank of Nigeria (CBN), committed criminal breach of trust in respect of the said property by remitting the said sum into the account of Daar Investment and Holding Company Limited controlled by one Dr. Raymond Dokpesi for the funding of the media activities for the 2015 presidential election campaign for the People's Democratic Party (PDP) and you thereby committed an offence punishable under **Section 315 of the Penal Code Act, Cap 532, Vol. 4, LFN 2004.**

COUNT 3

That you **COL. MOHAMMED SAMBO DASUKI (RTD.)** whilst being the National Security Adviser and **SHUAIBU SALISU** whilst being the Director of Finance and Administration in the office of the National Security Adviser, on or about **12th December, 2013** in Abuja, within the jurisdiction of this Honourable Court, and in such capacities entrusted with dominion over certain property, to wit: the sum of **N90, 000, 000 (Ninety Million Naira)** which was in the account of the office of the National Security Adviser with Diamond Bank Plc, committed criminal breach of trust in respect of the said property by remitting the said sum into the account of Brains and Hammers Limited for the purchase of 7-bedroom duplex house at No. 11, Mansur Bamalli Drive (D1064), Apo 1, Abuja in the name of Abubakar Atiku Dasuki, the son of Mohammed Sambo Dasuki and you thereby committed an offence punishable under **Section 315 of the Penal Code Act, Cap 532, Vol. 4, LFN 2004.**

COUNT 4

That you **COL. MOHAMMED SAMBO DASUKI (RTD.)** whilst being the National Security Adviser, **SHUAIBU SALISU** whilst being the Director of

Finance and Administration in the office of the National Security Adviser, on or about 28th January, 2015 in Abuja, within the jurisdiction of this Honourable Court, and in such capacities entrusted with dominion over certain property, to wit: the sum of N170, 000, 000 (One Hundred and Seventy Million Naira) which was in the account of the office of the National Security Adviser with Skye Bank Plc, committed criminal breach of trust in respect of the said property by remitting the said sum into the account of Urban Abode Nigerian Limited for the purchase of 4-bedroom duplex house at Plot 2562/2643, Platinum Villa (PV), Asokoro, Abuja in the name of AVM M.N Umaru and you thereby committed an offence punishable under Section 315 of the Penal Code Act, Cap 532, Vol. 4, LFN 2004.

COUNT 5

That you COL. MOHAMMED SAMBO DASUKI (RTD.) whilst being the National Security Adviser and SHUAIBU SALISU whilst being the Director of Finance and Administration in the office of the National Security Adviser between 9th October, 2014 and 17th April, 2015 in Abuja, within the jurisdiction of this Honourable Court, dishonestly misappropriated certain property, to wit: an aggregate sum of N1, 450,000,000 (One Billion, Four Hundred and Fifty Million Naira) belonging to the Federal Republic of Nigeria which sum was transferred to ACACIA HOLDINGS LIMITED'S bank account controlled by one Aminu Baba-Kusa purporting same to be payment for organizing prayers and you thereby committed an offence punishable under Section 309 of the Penal Code Act, Cap 532, Vol. 4, LFN 2004.

particulars of
Account

COUNT 6

That you COL. MOHAMMED SAMBO DASUKI (RTD.) whilst being the National Security Adviser and SHUAIBU SALISU whilst being the Director of Finance and Administration in the office of the National Security Adviser between 9th October, 2014 and 17th April, 2015 in Abuja, within the jurisdiction of this Honourable Court, entrusted with dominion over certain properties, to wit: an aggregate sum of N1, 450,000,000 (One Billion, Four Hundred and Fifty Million Naira) being part of the funds in the account of the office of the National Security Adviser with Zenith Bank Plc, committed criminal breach of trust in respect of the said property when you transferred same into the bank account of ACACIA HOLDINGS LIMITED purporting the said sum to be payment for organizing prayers and you thereby

Account
Details

entrusted with
transfer

committed an offence punishable under **Section 315 of the Penal Code Act, Cap 532, Vol. 4, LFN 2004.**

COUNT 7

That you **COL. MOHAMMED SAMBO DASUKI (RTD.)** whilst being the National Security Adviser and **SHUAIBU SALISU** whilst being the Director of Finance and Administration in the office of the National Security Adviser on or about **17th April, 2015** in Abuja, within the jurisdiction of this Honourable Court, dishonestly misappropriated certain property, to wit: the sum of **N750,000,000 (Seven Hundred and Fifty Million Naira)** belonging to the Federal Republic of Nigeria which sum was transferred to **RELIANCE REFERRAL HOSPITAL LIMITED'S** bank account in favour of one Aminu Baba-Kusa purporting same to be payment for organizing prayers and you thereby committed an offence punishable under **Section 309 of the Penal Code Act, Cap 532, Vol. 4, LFN 2004.**

COUNT 8

That you **COL. MOHAMMED SAMBO DASUKI (RTD.)** whilst being the National Security Adviser and **SHUAIBU SALISU** whilst being the Director of Finance and Administration in the office of the National Security Adviser on or about **17th April, 2015** in Abuja, within the jurisdiction of this Honourable Court, entrusted with dominion over certain properties to wit: the sum of **N750,000,000 (Seven Hundred and Fifty Million Naira)** being part of the funds in the account of the office of the National Security Adviser with Zenith Bank Plc., committed criminal breach of trust in respect of the said property when you transfer same into the bank account of **RELIANCE REFERRAL HOSPITAL LIMITED** purporting the said sum to be payment for organizing prayers and you thereby committed an offence punishable under **Section 315 of the Penal Code Act, Cap 532, Vol. 4, LFN 2004.**

COUNT 9

That you **ACACIA HOLDINGS LIMITED** and **AMINU BABA-KUSA**, between **9th October, 2014** and **17th April, 2015** in Abuja, within the jurisdiction of this Honourable Court, knew that an aggregate sum of **N1, 450,000,000 (One Billion, Four Hundred and Fifty Million Naira)** directly represented the proceeds of criminal conducts of **COL. MOHAMMED SAMBO DASUKI (RTD.)** and **SHUAIBU SALISU** who were National Security Adviser and the Director of Finance, Office of the National Security

Adviser respectively (to wit: criminal breach of trust in respect of the said amount), used the said property and you thereby committed an offence punishable under **Section 17 (b) of the Economic and Financial Crimes Commission (Establishment) Act, 2004**

COUNT 10

That you **ACACIA HOLDINGS LIMITED** and **AMINU BABA-KUSA**, between 9th October, 2014 and 17th April, 2015 in Abuja, within the jurisdiction of this Honourable Court, dishonestly received stolen property, to wit: an aggregate sum of **N1, 450,000,000 (One Billion, Four Hundred and Fifty Million Naira)** into your account with United Bank for Africa Plc and Ecobank Plc. from the account of the office of the National Security Adviser with Zenith Bank Plc., which sum belonged to the Federal Government of Nigeria and knowing the said sum to be stolen property but purporting same to be payment for organizing prayers and you thereby committed an offence punishable under **Section 317 of the Penal Code Act, Cap 532, Vol. 4, LFN 2004.**

COUNT 11

That you **RELIANCE REFERRAL HOSPITAL LIMITED** and **AMINU BABA-KUSA**, on or about 17th April, 2015 in Abuja, within the jurisdiction of this Honourable Court, knew that an aggregate sum of **N750,000,000 (Seven Hundred and Fifty Million Naira)** directly represented the proceeds of criminal conducts of **COL. MOHAMMED SAMBO DASUKI (RTD.)** and **SHUAIBU SALISU** who were National Security Adviser and the Director of Finance, Office of the National Security Adviser respectively (to wit: criminal breach of trust in respect of the said amount), used the said property and you thereby committed an offence punishable under **Section 17 (b) of the Economic and Financial Crimes Commission (Establishment) Act, 2004**

COUNT 12

That you **RELIANCE REFERRAL HOSPITAL LIMITED** and **AMINU BABA-KUSA**, on or about 17th April, 2015 in Abuja, within the jurisdiction of this Honourable Court, dishonestly received stolen property, to wit: an aggregate sum of **N750,000,000 (Seven Hundred and Fifty Million Naira)** which sum belonged to the Federal Government of Nigeria and knowing the said sum to be stolen property but purporting same to be payment for

organizing prayers and you thereby committed an offence punishable under **Section 317 of the Penal Code Act, Cap 532, Vol. 4, LFN 2004.**

COUNT 13

That you **COL. MOHAMMED SAMBO DASUKI (RTD.)** whilst being the National Security Adviser and **SHUAIBU SALISU** whilst being the Director of Finance and Administration in the office of the National Security Adviser on or about **9th April, 2015** in Abuja, within the jurisdiction of this Honourable Court, dishonestly misappropriated certain property to wit: the sum of **N380,000,000 (Three Hundred and Eighty Million Naira)** belonging to the Federal Republic of Nigeria which sum was transferred to Belsha Nigeria Limited's bank account controlled by Hon. Bello Matanwalle for distribution to support some members of the House of Representatives for their re-election campaign and you thereby committed an offence punishable under **Section 309 of the Penal Code Act, Cap 532, Vol. 4, LFN 2004.**

COUNT 14

That you **COL. MOHAMMED SAMBO DASUKI (RTD.)** whilst being the National Security Adviser and **SHUAIBU SALISU** whilst being the Director of Finance and Administration in the office of the National Security Adviser on or about **9th April, 2015** in Abuja, within the jurisdiction of this Honourable Court, entrusted with dominion over certain properties, to wit: the sum of **N380,000,000 (Three Hundred and Eighty Million Naira)** being part of the funds in the account of the office of the National Security Adviser with the Central Bank of Nigeria (CBN), committed criminal breach of trust in respect of the said property when you transferred same to the bank account Belsha Nigeria Limited purporting the said sum to be payment for consulting services and you thereby committed an offence punishable under **Section 315 of the Penal Code Act, Cap 532, Vol. 4, LFN 2004.**

COUNT 15

That you **COL. MOHAMMED SAMBO DASUKI (RTD.)** whilst being the National Security Adviser and **SHUAIBU SALISU** whilst being the Director of Finance and Administration in the office of the National Security Adviser between **12th August, 2014** and **23rd March, 2015** in Abuja, within the jurisdiction of this Honourable Court, entrusted with dominion over certain

properties, to wit: the sum of **N670,000,000 (Six Hundred and Seventy Million Naira)** being part of the funds in the account of the office of the National Security Adviser with the Central Bank of Nigeria (CBN), committed criminal breach of trust in respect of the said property when you transferred same to the bank account of General Hydrocarbons Limited with the Guaranty Trust Bank plc. controlled by one **OBAIGBENA NDUKA** purporting the said sum to be payment for "energy consulting" and you thereby committed an offence punishable under **Section 315 of the Penal Code Act, Cap 532, Vol. 4, LFN 2004.**

COUNT 16

That you **COL. MOHAMMED SAMBO DASUKI (RTD.)** whilst being the National Security Adviser and **SHUAIBU SALISU** whilst being the Director of Finance and Administration in the office of the National Security Adviser on or about **28th November, 2014** in Abuja, within the jurisdiction of this Honourable Court, entrusted with dominion over certain properties, to wit: the sum of **N260,000,000 (Two Hundred and Sixty Million Naira)** being part of the funds in the account of the office of the National Security Adviser with Skye Bank Plc., committed criminal breach of trust in respect of the said property when you transferred same to the bank account of **TONY ANENIH** with First Bank of Nigeria Plc. and you thereby committed an offence punishable under **Section 315 of the Penal Code Act, Cap 532, Vol. 4, LFN 2004.**

COUNT 17

That you **COL. MOHAMMED SAMBO DASUKI (RTD.)** whilst being the National Security Adviser and **SHUAIBU SALISU** whilst being the Director of Finance and Administration in the office of the National Security Adviser between **8th January, 2013** and **4th March, 2015** in Abuja, within the jurisdiction of this Honourable Court, entrusted with dominion over certain properties, to wit: an aggregate sum of **N345, 000, 000 (Three Hundred and Fifty Million Naira)** being part of the funds in the account of the office of the National Security Adviser with the Central Bank of Nigeria (CBN), committed criminal breach of trust in respect of the said property when you transferred same to the bank account Starbriid Limited with Stanbic IBTC Bank and Guaranty Trust Bank controlled by one Emmanuel Lawani on behalf of **SENATOR IYORCHIA AYU** for the construction of shopping mall at Jabi, Abuja, purporting the said sum to be payment for satellite charges

and security equipment and you thereby committed an offence punishable under **Section 315 of the Penal Code Act, Cap 532, Vol. 4, LFN 2004.**

COUNT 18

That you **COL. MOHAMMED SAMBO DASUKI (RTD.)** whilst being the National Security Adviser and **SHUAIBU SALISU** whilst being the Director of Finance and Administration in the office of the National Security Adviser between **October, 2014** and **April, 2015** in Abuja, within the jurisdiction of this Honourable Court, agreed to do an illegal act, to wit: criminal breach of trust by public officers in respect of an aggregate sum of **₦13, 570,000,000 (Thirty Billion, Five Hundred and Seventy Million Naira)** being part of the funds in the accounts of the office of the National Security Adviser and that the same act was done in pursuance of the agreement among you and you thereby committed an offence punishable under **Section 97 of the Penal Code Act, Cap 532, Vol. 4, LFN 2004**

COUNT 19

That you **ACACIA HOLDINGS LIMITED, RELIANCE REFERRAL HOSPITAL LIMITED** and **AMINU BABA-KUSA**, between **October, 2014** and **April, 2015** in Abuja, within the jurisdiction of this Honourable Court, agreed to do an illegal act, to wit: dishonestly receiving stolen property to wit: an aggregate sum of **₦2, 200,000,000 (Two Billion, Two Hundred Million Naira)** being part of the funds in the accounts of the office of the National Security Adviser and that the same act was done in pursuance of the agreement among you and you thereby committed an offence punishable under **Section 97 of the Penal Code Act, Cap 532, Vol. 4, LFN 2004.**

Dated this day of 2015

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ALIYU M. YUSUF,
DEPUTY DIRECTOR OF LEGAL,
LEGAL & PROSECUTION DEPARTMENT,
ECONOMIC AND FINANCIAL CRIMES COMMISSION
ABUJA.

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