

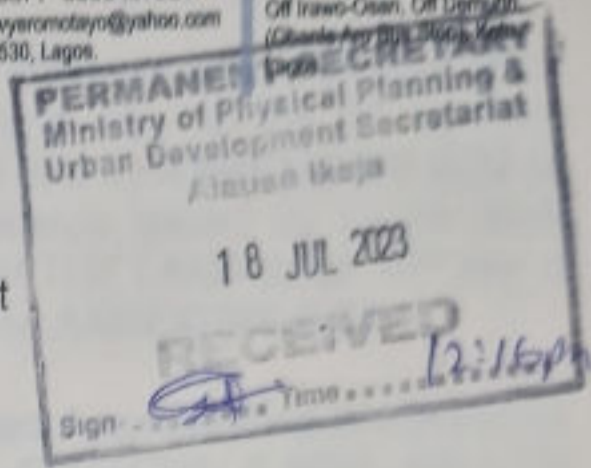


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14th July 2023

The Permanent Secretary,
Lagos State Physical Planning & Urban Development
Block 15 Alausa Secretariat,
Ikeja, Lagos State

Dear Sir,

RE: LETTER DATED 6TH DAY OF JULY 2023 TITLED "LAGOS STATE URBAN AND REGIONAL PLANNING AND DEVELOPMENT LAW 2010, NOTICE TO QUIT" WITH SN. MPP&UD/TSD/QN/27/00066LA:

PRESENTATION OF TITLE DOCUMENTS AS REQUESTED & PROTEST AGAINST THE USE OF LAGOS STATE PHYSICAL PLANNING & URBAN DEVELOPMENT ENFORCEMENT DEPARTMENT TO WRESTLE LAND.

We refer to the telephone discussion the undersigned, Chief Mrs. M. A. Omotayo (Yeye Tayese of Ikate Elegushi Kingdom) had with Mr. Bola Aliu of the Enforcement Department on Wednesday the 12th day of July 2023 on the instruction of HRM. Kabiyesi Alayeluwa Oba Saheed Ademola Elegushi (Kusenla III) on the above captioned, whereof it was agreed that the undersigned shall visit your office with the requested title documents on the land subject matter of the letter dated 6th day of July 2023, on Tuesday the 18th day of July, 2023.

Please refer also to the undersigned further discussion with the same Mr. Bola Aliu on Thursday the 13th day of July, 2023 when the staff of your office visited the land and threatened that your office shall take decision on the true ownership of the property subject matter of your said letter and demolish whatever structure thereon on/or before Tuesday the 18th day of July 2023, if your office did not receive the requested title documents latest Monday the 17th day of July 2023.

In response to your request, we hereby at the instruction of HRM. Kabiyesi Alayeluwa Oba Saheed Ademola Elegushi (Kusenla III) forward herewith and marked **ANNEXURE BO1**, the title documents of MR. IJEOMA DANIEL EBOAGWU & MRS. PAULYN ONOSETALE EBOAGWU who are the joint assignee of the land subject matter of your letter measuring 1580.565sq. meters situate lying and being at Chief Alawe Street, Iroko Awe Village, Eti Osa Local Government Area of Lagos State, which land is particularly described and delineated in **Survey Plan no, KCO/902/006^B-C6¹⁴/2018/LA**, prepared by Chris Kay & Associates, Registered

Surveyors of no 6, Olatunji Akinsanya Street, Pedro, Gbagada, the land instrument which is REGISTERED AS NO. 32 AT PAGE 32 IN VOLUME 2657 OF THE LAND REGISTRY.

Attached also are some of the Lagos State Revenue Receipts issued by your office, the Lagos State Town Planning Permit Authority and copy of the ET numbers generated by your office on payment in respect of the land as **ANNEXURES BO2 (a-c)**. This notwithstanding, other payments and clearance issued by Lagos State Government including **CLERANCE ALLIGNMENT ON THE LAND** dated 29th day of June 2022, which is also herewith attached and marked **ANNEXURE BO3**.

As Solicitors to HRM. Kabiyesi Alayeluwa Oba Saheed Ademola Elegushi (Kusenla III), Elegushi Royal Family and Mr. IJEOMA DANIEL EBOAGWU & MRS. PAULYN ONOSETALE EBOAGWU we wish to register Our Client's protest and serious objection to the office of the Lagos State Physical Planning & Urban Development and in particular the Technical/Enforcement Department assuming and arrogating to itself the position of the Lagos State High Court to determine ownership and title to land in context between **CHRONODEXIA INV. NIG.** a company represented and/or owned by **MILIND DETTATRAYA KULKARNI (AN INDIAN)** and Mr. IJEOMA DANIEL EBOAGWU & MRS. PAULYN ONOSETALE EBOAGWU.

MR. IJEOMA DANIEL EBOAGWU & MRS. PAULYN ONOSETALE EBOAGWU bought the land in question from Elegushi Royal Family in 2016 and was put into possession whereof the Assignee exercised ownership and possessory rights including sand filling of the land with over 185 lorry loads of sand, fencing same, registered the title document with the Lagos State Government and obtained other clearances and permits without let or hindrance from any quarters including the complainant, **CHRONODEXIA INV. NIG.** and/or **MILIND DETTATRAYA KULKARNI (the Indian)**, who are trying to illegally use the office of the Lagos State Physical Planning to wrestle the land under the guise of checking land documents.

In 2010 Elegushi Royal Family sold/assigned a piece of land to Shell Staff Co-operative Multipurpose Society Limited but there was boundary adjustment on the land sold for the reasons that:

- (1) Part of the land assigned to Shell Staff Co-operative Multipurpose Society Limited had been expunged in the Lagos State of Nigeria Official Gazette No. 20 Vol. 37 dated 28th October 2004. **Attached and marked Annexure BO3 is a copy of the Gazette.**
- (2) The land assigned to Shell Staff Co-operative Multipurpose Society Limited does not take into cognisance access road to other properties within Parcels E & F of Elegushi Royal Family land.

(3) The Yemoja/Osun Shrine of the African Traditional Religion Practitioners was also encapsulated within the land assigned to Shell Staff Co-operative Multipurpose Society Limited.

Based on the agreement to adjust the boundaries and delineation without losing a piece of its land, Shell Staff Co-operative Multipurpose Society Limited in the interest of all parties concerned constructed a perimeter fence to reflect the new boundaries and promised also to effect correction on the Survey Plan. **Please find attached and marked ANNEXURE BO4 (a-c) pictures/photographs showing the perimeter fence constructed delineating Shell Staff Co-operative Multipurpose Society Limited and ANNEXURE BO5, the physical drawing reflecting the adjustment.**

Also attached and marked ANNEXURE 6(i) –(viii) are copies of geoeye imagery of Shell Staff Co-operative Multipurpose Society Limited's land boundaries from year 2009 to 2021 as reflected by and coordinated in Nigeria datum, a geodetic datum plotted on Google Earth.

Elegushi Royal Family and Shell Staff Co-operative Multipurpose Society Limited acted on this position for **over 13 (thirteen) years** before **CHRONODEXIA INV. NIG.** purchased this land from AMCON in 2022 and the petition written by **CHRONODEXIA INV. NIG's Counsel, SILVER EBARE & CO** to the Land Grabber's Office, Alausa Ikeja, Lagos State.

Haven failed in its bid to annex our client's land to the land assigned to **CHRONODEXIA INV. NIG** through the office of Lagos State Land Grabber, **CHRONODEXIA INV. NIG.** Approached Lagos State Physical Planning & Urban Development purporting to represent AMCON, hence the letter posted on the wall of the land subject matter of this letter.

Notwithstanding that Elegushi Royal Family had attempted to broker peace and assure **CHRONODEXIA INV. NIG.** that based on the agreement reached with Shell Staff Co-operative Multipurpose Society Limited it has not lost any piece of land, **CHRONODEXIA INV. NIG.** continued in its bid to annex the land subject matter of this letter at all cost.

Sir, Our Client have been so troubled and disenchanted, the only succour we opine, is your power to intervene to put a check to this ultra vires act, abuse of the office/power and the attempt to use the office of the Lagos State Physical Planning & Urban Development to wrestle land. The Notice to Quit issued and pasted on the land subject matter of this letter irrespective of evidence of the owner of the land already having transaction with the Lagos State Physical Planning (**PLEASE REFER TO ANNEXURES BO 2(A-C) & ANNEXURE BO3**) is a pointer to malice and absolute bad faith.

It is in the light of the above we pray that you use your good offices and trusted ability to investigate this complaint, stop the office of the Lagos State Physical Plannings & Urban Development, Technical/Enforcement Department from further harassment,

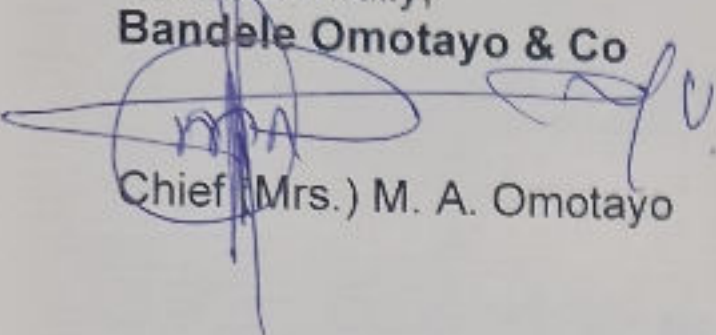
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intimidation, coercion, threat to demolish the property on the land subject matter of this letter for no just cause and usurping the powers of the High Court of Lagos State in trying to determine ownership/title to the land in issue between **CHRONODEXIA INV. NIG.** and **MR. IJEOMA DANIEL EBOAGWU & MRS. PAULYN ONOSETALE EBOAGWU** and by extension **ELEGUSHI ROYAL FAMILY**.

While thanking you for your immediate and swift intervention, we remain,

Yours faithfully,

Bandeale Omotayo & Co


Chief (Mrs.) M. A. Omotayo

Cc:

1. THE LAGOS STATE EXECUTIVE GOVERNOR
LAGOS STATE HOUSE, ALAUSA LAGOS STATE
2. THE LAGOS STATE HEAD OF SERVICE
ALAUSA, IKEJA
LAGOS STATE.
3. HRM. OBA SAHEED ADEMOLA ELEGUSHI
ELEGUSHI OF IKATE kingdom
LAND. IKATE. LAGOS STATE.
4. MR. BOLA ALIU
ENFORCEMENT DEPARTMENT,
LAGOS STATE PHYSICAL PLANNING & URBAN DEVELOPMENT
BLOCK 15 ALAUSA SECRETARIAT,
ALAUSA, LAGOS STATE