

Joyce Oduah, FICMC

JOYCE ODUAH & Co.

Solicitors, Advocates, Arbitrators,
Mediators & Notaries Public.

20th September, 2022

Yakubu Maikyau, SAN
The President,
Nigerian Bar Association

NBA House,
Plot 1101 Mohammadu Buhari Way, Central Business District
Abuja, FCT, Nigeria

Mr President,

**RESPONSE TO ALLEGATIONS AGAINST ME BY THE FORMER
NATIONAL OFFICERS OF THE NIGERIAN BAR ASSOCIATION VIA
AN INTERNAL MEMO DATED 14TH AUGUST, 2022**

It is after deep contemplation that I am constrained to respond to the allegations issued against me by the National Officers of the Nigerian Bar Association via an Internal Memo of the Association made available to the public dated the 14th day of August, 2022 titled Need for Urgent Action to Forestall a Crisis in the Nigerian Bar Association. **The said allegation** came to my knowledge on the 15th day of August, 2022 as news was circulating on social media.

My hesitations towards responding to the barrage of unfounded allegations levelled against my person and office as the General Secretary (GS) of the Nigerian Bar Association (NBA) is because of my esteemed regards for the Association and all that it represents. Consequently, my considered thoughts were that the solution to such issues that may amount to disparaging the Association in public should be orchestrated in-house. Nonetheless, due to the general principle of law that silence may amount to admission and for the purpose of clarity, I am forced to respond to the allegations.

1. Without any ambiguities or contradictions, I state expressly that I have the highest respect for the NBA and all that it represents. My records of service to the NBA from my Youth Service (1992) as rapporteur and from 2002 in the Branch and National levels – even before serving as the General Secretary – are verifiable evidence of this. I would not have devoted years to serve in various capacities with landmark achievements, an association that I do not hold in high regards.
2. In my tenure, as the GS, I diligently and efficiently discharged my secretarial responsibilities. Also, I brought and facilitated innovative ideas including the recently launched NBA App. The USSD CODE which I introduced and was approved by NEC for immediate implementation – which I also worked hard to bring to life – was stalled. I pray that you and your Excocs bring it to life as it is a tool capable of, among others, ensuring participation of our colleagues in rural areas with unstable internet connection. With the USSD code they can pay for their BPF, Stamps, Conference fees, Vote and get information from the NBA without internet connection. It behoves of the highest contradiction to state that a person with my track-record of service and dedication will turn around to be deviant to the tenets of the Association.
3. Before going further, it is pertinent to respond to each of the allegations;

3.1. LACK OF PROPER TEMPERAMENT EXPECTED OF THE GENERAL SECRETARY IN THE MANAGEMENT OF THE SECRETARIAT STAFF.

First, I saw and still see all the staff of the Secretariat as family, and I treated them as such. They can testify to this fact. I would not have consistently clamoured for their welfare and trainings to enhance their professional development if I did not care about their wellbeing. It is, thus, antithetical to suggest that I treated them discourteously.

Second, the allegation that I physically assaulted Mr. Ndifreke Aquaisua is false. I have never at any time assaulted or slapped him or any other staff. Mr. Aquaisua was not a secretariat staff; I brought him to Abuja all the way from Uyo to act as my executive assistant. I also saw him as family to the point of inviting him into my home. To ensure his welfare and make his working conditions very conducive, I made sure that I or my driver dropped him off every day after work at the bus-stop nearest to his house –

that was the daily routine. Also, I gave him daily stipend to cover his transportation fare. On the 10th of October, 2021, my driver was about to drive off after work when I noticed Mr. Aquaisua was not in the car. I enquired as to his whereabouts from the driver whom I asked to wait for him. After several minutes of calling his phone and waiting, I became worried as to his safety. Upon further inquiry from another member of staff, I was informed that he had left the office earlier. The next day in the car, I expressed my displeasure about his leaving without informing me. The only physical contact with Mr. Aquaisua was a tap on his left shoulder to get his attention. Hence, the allegations that I slapped him from the backseat of the car is most shocking. I believe that his animus is that he thought I had the capacity to unilaterally increase his salary above that of the Secretariat staff because he was the executive assistant to the GS. This was despite his salary being at par with those of other staff who were employed before him. Also, in December, he had requested that I include him on the list of staff entitled to be paid housing allowance for the year even though he was barely 3 months in office. I informed him that I could not unilaterally take these decisions. This was the reason he resigned in January 2021, not to mention his incompetence in handling the duties of the executive assistant.

It is worthy to state further that his incompetence which was part of the reason for his resignation could be seen in his inability to write an application letter. It was an embarrassing situation when the President sent me a message complaining about the application letter that Mr. Aquaisua sent to him. In my eagerness to assist Mr. Aquaisua to become successful, I suggested that he look up some templates on google to aid him in writing a proper application letter. Mr. Aquaisua apologized for his inability to write the said letter. Throughout the course of our work relationship, I continually urged him to develop his writing skills which was a prerequisite for his role. All the conversations relating to this incident is attached as AA1.

It is most surprising that the executives of the association did not bring these allegations to my notice until the events of the past days occurred. Instead, they chose to level them against me in the memo released to the public on the uncorroborated testimony of one person. To make matters worse, there are conflicting accounts of the incident. Paragraph 7 of the Internal Memo by the Excocos states that I slapped him in the office while Mr. Aquaisua in his affidavit dated 18th August 2022, which I saw on social media, claims that it happened in the car.

Joyce Oduah, FICMC
JOYCE ODUAH & Co.

3.2. LACK OF CAPACITY OR INABILITY TO DILIGENTLY DISCHARGE THE DUTY OF HER OFFICE:

The allegations that I do not produce the communiques of NEC meeting and that same is usually produced by the Publicity Secretary and the President is completely false and unfounded. For instance, in relation to the Ilorin meeting referenced in the Memo, the meeting was held on the 9th of June, 2022 and I sent the communique for the President's review and assent in the morning of the 10th June, 2022. However, the President did not revert to me despite several reminders, until the 22nd June, 2022, when it was already too late to issue same. I have the screenshots of our correspondence in respect of this attached as AA2.

3.3. REFUSAL TO WRITE TO THE TREASURER OF THE OKEHI BRANCH AS DIRECTED BY THE NATIONAL EXECUTIVE COUNCIL IN HER MEETING HELD ON THE 18TH DAY OF MARCH 2021:

The purported refusal to write the treasurer of the Okehi branch is another unfounded allegation. In fact, I wrote the letter and reported same to the 2021 Annual General Meeting. The screenshot of the email is attached herewith. The screenshot of the email and the relevant page of the AGM report are attached as AA3

3.4. REFUSAL TO WRITE TO THE FEDERAL HIGH COURT WARRI IN RE: ANDREW UBIDO, ESQ:

In relation to the matter above, Mr Kunle Edun sent me a draft letter to sign and forward to Honourable Justice Abang of the Federal High Court, Warri. I informed him that based on facts which I obtained from the Chairman of the Branch, there were no proceedings before the court, thus, there was no need to request for the certified true copies of non-existent proceedings. I eventually consulted with the President who agreed with my position and informed me that he told Aikpokpo and Kunle that my position was right. The screenshot of our correspondence on this issue is attached as AA4.

3.5. REFUSAL TO WRITE TO THE SUPREME COURT, THE FEDERAL HIGH COURT ABUJA AND INSPECTOR GENERAL OF POLICE IN RE: THE MATTER OF AYODEJI ADELEKE AKINJOKUN:

The facts in this instance speak for themselves as I wrote this letter on the 24th May 2022. Attached herewith are screenshots as evidence. Attached herewith as AA5 are screenshots in respect of this issue.

3.6. ONDO STATE ELECTION:

First, I was not assigned by the President to lead the NBA team of observers to the Ondo State governorship election although that supposed to be the case as the GS. Instead, the President assigned this responsibility to one Mr. Aderemi Oguntoye.

Second, the idea of visiting the Governor's residence was initiated by members of the team that I was part of because it was reported that the wife of the Governor was shot. However, upon getting there, the Governor's wife addressed everyone present including the press and other observers that it was fake news. When the president inquired about this, I explained same to him. I wonder what anybody making the claim that the General Secretary chaired the team intends to achieve when in fact everybody knows that it was the President's friend one Mr Aderemi Oguntoye that led the team. His report is contained in the AGM statutory report 2021 and the relevant portion is attached as AA6.

3.7. FURTHER AND IMMEDIATE ACT OF DISOBEDIENCE TO LAWFUL DIRECTIVES OF THE NATIONAL EXECUTIVE COMMITTEE, DERELICTION OF DUTY, INSURBODINATION, CRIMINAL REPRESENTATION AND WILFUL AND DELIBERATE ACT INTENDED TO INJURE MEMBERS OF THE ASSOCIATION:

Details of what transpired as regards the allegation in Paragraphs 18 to 23 of the Internal Memo, including the issuance and withdrawal of notices and all the efforts that I made to save the Association bad publicity are contained in my prior press release titled "Setting the Records Straight", also attached herewith as AA7. One would have expected a considered response to my claims that Section 25 of the NBA Constitution was breached by the Constitution Review Committee; surprisingly, it was tactically left unanswered.

For the avoidance of doubt, I never tampered with the documents sent by the Constitution Review Committee. The Committee did not comply with the provision of Section 25(1) of the Constitution which provides that the GS must receive any proposal for amendment of the Constitution within a minimum of 60 days before the AGM. While the Branch Chairmen met the

timeline, the Committee did not as their proposals were sent and received by the GS 30 days before the AGM. Having received that of the Branch Chairmen within time, I circulated same having met with the constitutionally stipulated timeline.

4. The animus for this attack on my person, I believe, is due to the President's erroneous belief that I was sponsored by his "political enemy". After the election, when I got wind of this and asked him about this, he did not deny it. The following events further confirmed my belief:

- 4.1. First, the president showed clearly that he had no intention of communicating with me directly. For example, after our swearing-in, the Assistant Secretary reached out to me requesting for my manifesto stating that the President had directed her to get same from me. I contacted the President to inform him that he could reach me directly instead of going through the Assistant Secretary. Subsequently, the President invited me to his Lagos office and informed me that I could only reach him through his assistants as he will not be communicating with me directly. Our conversation relating to this is attached as AA8.

- 4.2. Second, the president continually took steps to undermine the office of the General Secretary; for example, he informed me that I was to be at the secretariat only once in a week. That was most surprising considering the nature of the position as the head of the secretariat with lots of responsibilities. It is obvious that only 9-5 on a single day in a week would be insufficient, but the President was not interested in my explanations. Still, I carried on my duties diligently and made personal sacrifices including working virtually just to meet up with the requirements of the office. He also reduced the allowance which I was entitled to as GS to be at par with other exco members. I took the reduction graciously and without complaint as my purpose for serving the Association had never been monetary gain but the desire to serve.

- 4.3. Third, on our swearing-in, the first vice president raised the issue of protocol stating that his office came first before that of the General Secretary of the Association. I explained to him and the other excos that in the over 20 years of my service to the Association both at the Branch and National levels, that had never been the case. The office of the General

Secretary had always come after the President in correspondences because of the sensitive nature of the role of the General Secretary as head of the NBA Secretariat. To my surprise, the President took his side even after past presidents confirmed to him that that had always been the state of affairs. This issue was constantly brought up by the 1st Vice President in the Exco meetings. In one of the Exco Meetings, he suggested that they take a vote on the issue. I informed them that they lacked the power to take a vote on this issue, rather they should refer the matter to the National Executive Council. Knowing they would fail, they never raised the topic again. I was appalled by the continued and concerted oppressive actions towards me and sadly, I felt that their intention was to subdue me because of my gender. In this age, I would have thought that no duly elected officer of our esteemed Association should be intimidated and suppressed based on circumstances of birth.

- 4.4.** From the forgoing, it is apparent that these incidents and allegations were all lies and calculated steps to undermine my person and office. The purported suspension which was illegal, wrongful and contrary to the provisions of the Constitution of the NBA was the apogee of the plan by the National Executive Committee to intimidate me into silence.

In line with my campaign promises to come what may, uphold the constitution and integrity of the Association, I can unequivocally state that I delivered as promised even though my stance on upholding the rule of law and following the constitutional procedures for amendment of the constitution gored some horses. I served the Association and upheld its constitution conscientiously and diligently to the best of my abilities even as I receive commendations from our members. Attached as AA9 are screenshots of some of the commendations I have received.

Finally, I restate categorically that I never had a course to derelict my secretarial duties, disobey the constituted authority, assault any member of the staff or do any act capable of bringing the Association to disrepute. I have dedicated many years of committed and passionate service to this Association – since 1992 during my NYSC years till date – and my verifiable track record is evidence to this. I, as the National Treasurer of our association, introduced the BAR CODE

Joyce Oduah, FICMC
JOYCE ODUAH & Co.

which turned around the fortunes of the NBA Branches for good till date. For example, before the introduction of the BAR Code Lagos Branch got between N400,000 to N500,000 annually. After I introduced the Bar Code, Lagos Branch with Bar Code no. 058 got N6,500,000 in 2013 and N7,500,000 in 2014. Currently, Lagos gets approximately N14,000,000 to N15,000,000 annually. The same applies to other Branches across the Federation. Also, as promised in my manifesto, I pushed for and delivered on the digitisation of the NBA Secretariat to be an ICT Based Innovative Secretariat, thus, bringing it in tandem with global standards. After much pressure and persuasion, this culminated in the NBAApp recently launched. Hence, it is a fallacious contradiction to suggest that I would turn around to destroy what I have been working so hard to build. I have never and would never do anything that will bring the Nigerian Bar Association and indeed our noble legal profession into disrepute.

Thank you.

Yours faithfully,



Joyce Oduah FICMC
General Secretary, NBA
2020 to 2022.

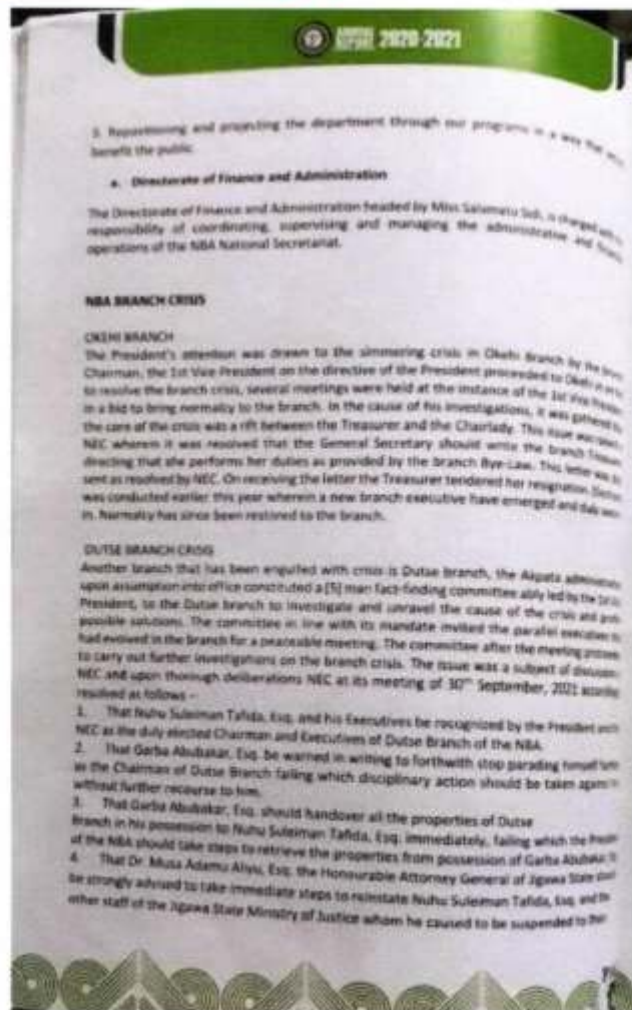
AA1



AA2



AA3



AA4

18:46

18:46

← Re: Draft application for...

[Sent from Yahoo Mail on Android](#)

On Thu, 24 Feb 2022 at 19:28,
Joyce Oduah
<joyceoduah@yahoo.com> wrote:

Dear Kunle,

Please explain to me what record
of proceeding you need because I
will not ridicule the NBA.

Thank you.

Joyce Oduah, FICMC

[Sent from Yahoo Mail on Android](#)

On Thu, 24 Feb 2022 at 19:01,
kunle edun
<eduovo@yahoo.com> wrote:

Madam GS,

Delete Archive Move Reply all More
III □ <

18:44

18:44

← Re: Draft application for...

On Thu, Feb 24, 2022 at 16:32,
Joyce Oduah
<joyceoduah@yahoo.com>
wrote:

Dear Kunle,

I have seen your draft letter.

I have spoken with the Chair
Warri to get the facts.

From the facts Mr. Andrew
Ubido was not before the
Court, he was at the registry
before he was brought to the
Court and asked to face the
wall.

From the above there will be
no record of proceeding. The
option available is to invite
the lawyer that was before
the Court and other lawyers

Delete Archive Move Reply all More
III □ <

18:45

18:45

← Re: Draft application for...

no record of proceeding. The
option available is to invite
the lawyer that was before
the Court and other lawyers
present to give an account of
what transpired in court that
day or to testify before any
panel.

It will not be wise to write a
letter requesting for
proceedings when there was
none.

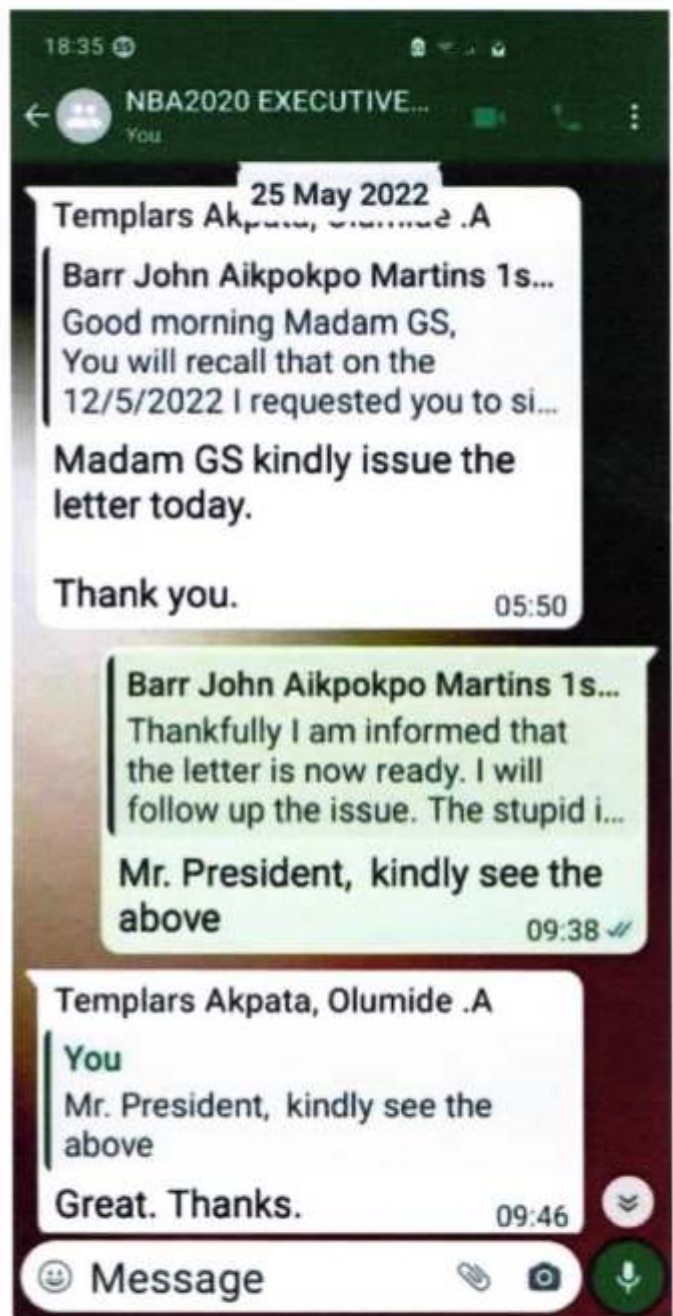
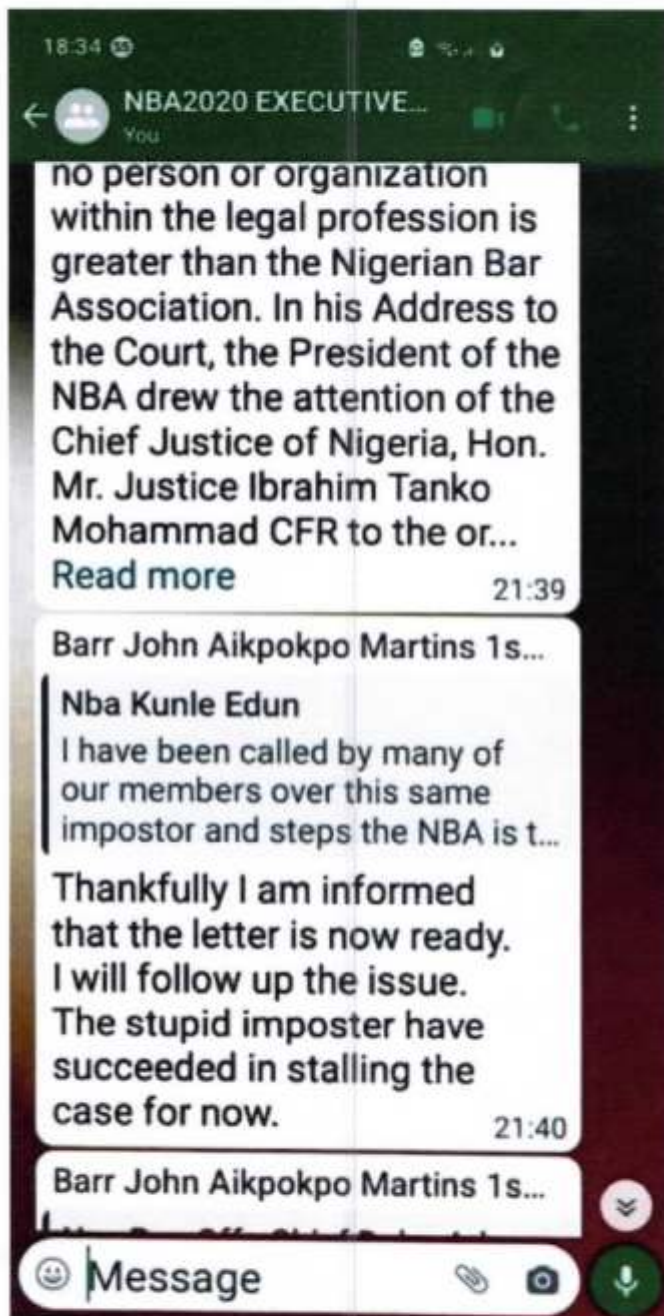
Thank you.

Joyce Oduah, FICMC
General Secretary, NBA.

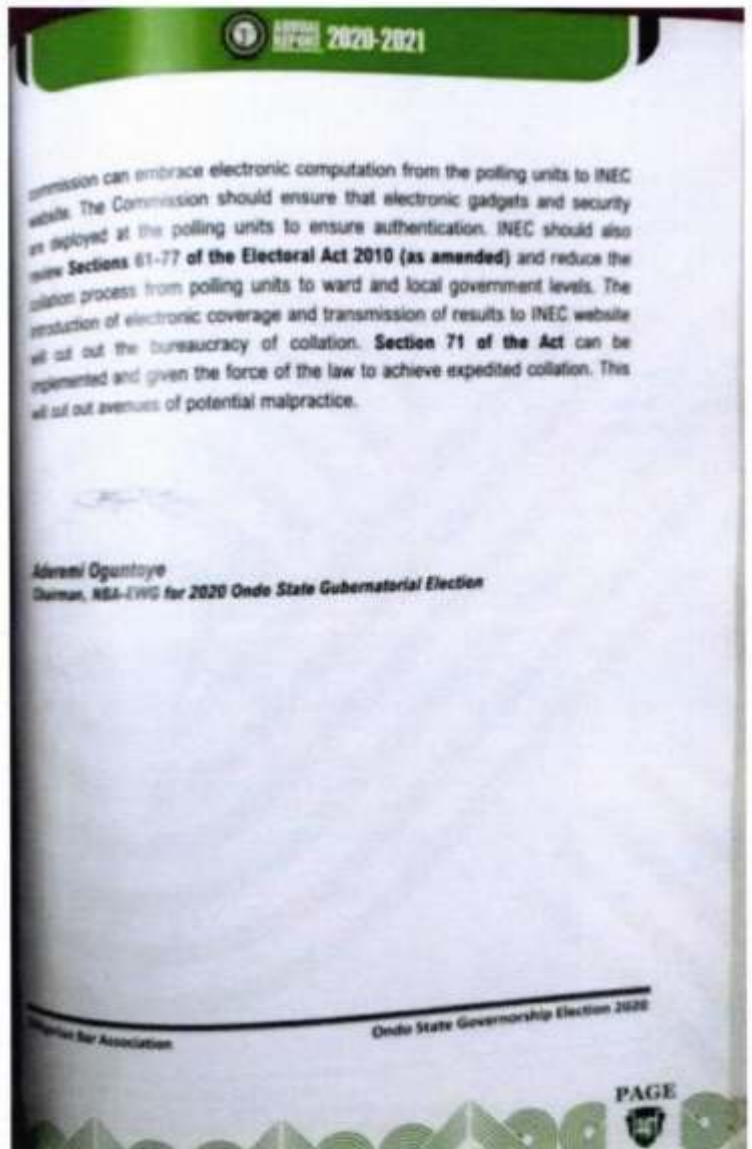
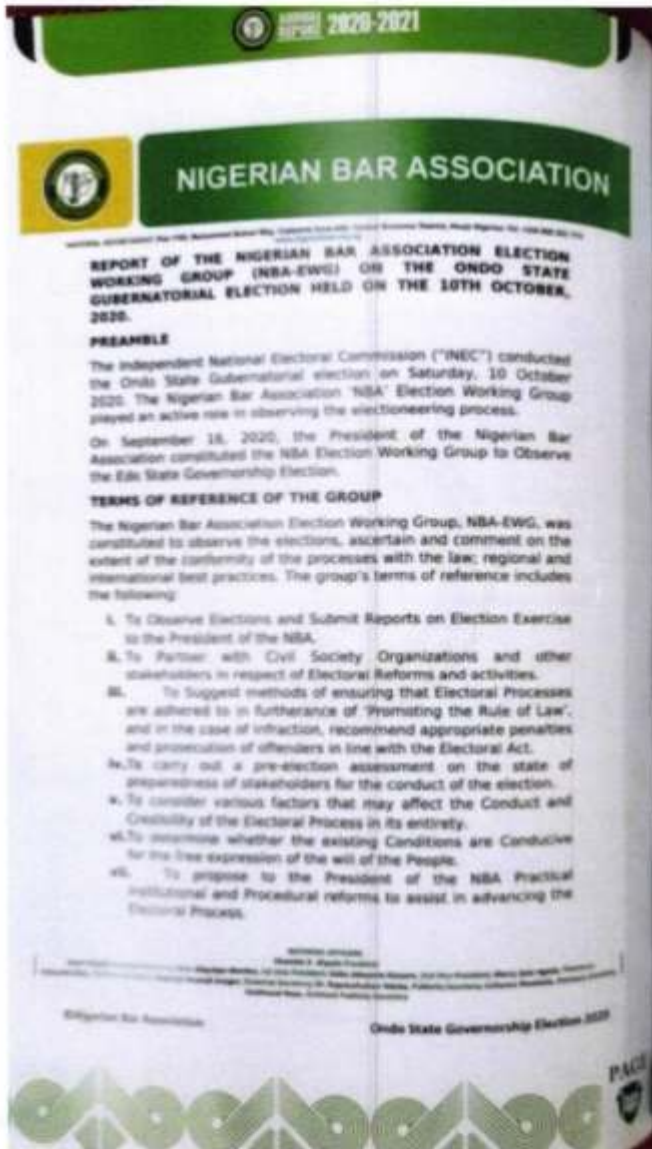
[Sent from Yahoo Mail on
Android](#)

Delete Archive Move Reply all More
III □ <

AA5



AA6




NIGERIAN BAR ASSOCIATION

SETTING THE RECORD STRAIGHT

Dear Learned Silks, Benchers and Distinguished colleagues,

Ordinarily, I would not have responded to the Disclaimer issued by the President on the 13th of August, 2022, but I am constrained to do so. It is important that I set the record straight as I have received numerous calls from concerned members asking me to state my side of the story. Let me begin by saying that my loyalty goes to the generality of the members of our great profession; and so, in carrying out my responsibilities as the General Secretary [GS] of the Association, I will uphold, dispatch my responsibilities by working within the ambit of the NBA Constitutional provisions whilst respectfully carrying out legal directives and instructions from the National Executive Council [NEC] and the President.

1. As the President stated in paragraph 1 of the 9th Council, the NBA National Executive Council (NBA/NEC) at the last meeting held in Harbin on the 09th of June, 2022 resolved that some amendments be made to the NBA Constitution. These amendments include the "Increment of the amount from the Har Practising remitted to the Branches from 10% to 20%, and other non-contentious issues." The Constitution Review Committee and other interested persons could, thus, propose amendments to the constitution in line with the conditions stipulated in the NBA Constitution 2015 (as amended in 2021).
2. The condition for amendment of the constitution is stated in Section 25 (1) of the NBA Constitution, thus: "The constitution shall not be amended or repealed or re-structured except at the Annual General Meeting of the Association and two-third of the branches of the Association are represented and provided further that at least sixty (60) days' notice of the proposed amendment shall have been given to the General Secretary who shall have circulated same to delegates at thirty (30) days before the proposed amendment is tabled for discussion at the Annual General Meeting."

4. In line with the call of the provisions, the office of the General Secretary received a Notice of Proposed Amendment on the 14th day of June, signed by the Chairman of the Branches for the amendment of Section 25 (b) of the NIRA Constitution to read "Twenty percent of the BHP paid by members of each Branch shall be remitted to the Branch in the month of April and December respectively." **The said letter which complies with Section 25 (b) of the constitution is attached herewith.**

5. The Constitution Review Committee was also in line with the said proposed amendments but did not forthcoming. In the National Executive Committee (Exco) meeting held on the 30th day of June, 2022, I informed the President and Excos that the Constitution Review Committee was out of the constitutionally stipulated time to forward the said amendment. Prior to this time, I had called the Chairman of the Committee on several occasions to send to the Constitution proposed amendment as they were almost out of time. I had also called the President to inform him that the Committee was not forthcoming. I also informed him that the proposed amendment was eventually sent by the Constitution Review Committee to the office of the General Secretary on the 26th of July via email – 30 days behind the stipulated time required by the constitution. **Recap of the email is attached.**

6. The President instructed that it was a Notice of proposed Constitution Amendment to send to members for the AGM, and I was compelled with his directive and observance of the role of which guides the Nigerian Bar Association that I sent out the said Notice on the 27th of July 2022 containing only the proposal by the Branches which I learnt could meet the requirement of Section 25 (1) of the Constitution.

7. When this matter was brought up at the National Executive Committee (Exco) meeting on the 31st of August, 2022, I informed the President that the amendment by the Constitution Review Committee was omitted because of their non-compliance with section 25(1) of the Constitution. The President and Excos canvassed that we could conveniently bypass the requirement of the constitution, but I informed them that the requirement of Notice was not a mere procedural matter but a substantive issue which could not be sidestepped without meaningful consequences. The President and other excons resorted to using several influences to bully me into forwarding the amendment to the AGM. I informed them that I would not do that and that I was going to uphold the Constitution of the NIRA and that I will send it.

7. The President indicated that it was irrelevant whether I amended the notice or not as he had the power to request any member of the Exco to perform any duties including that of the General Secretary. To my surprise, the next day, 28th of July, 2022, the Assistant Secretary sent out a second notice of proposed amendment to the constitution and attached the proposal sent by the Constitution Review Committee that did not meet the 60 days requirement of Section 25 (1). This was a failed attempt to usurp the constitutional duties of the office of the General Secretary and countermmand the notice issued by the office of the General Secretary the previous day; which was infast resisted by the good members of the Association.

9. On the 29th of August, the president and executive members left the executive group because of his insistence on upholding the rule of law. Since then, I have received no notice or information of Exco meetings. On arriving at my office on the 13th of August, 2012, I discovered that the President had transferred my secretary who worked with me for 2 years without compensation to another office. I was not given any explanation for this. I was also informed at a critical time of preparing documentation for the Pre-Conference NERC and AMCON demonstrates his well-established unilateral control and command leadership style. Also, it was informed that the members of staff of the Secretariat had been directed by the President not to take instruction from my office but directly from him – a Secretariat which the General Secretary is in charge of. This action by the President clearly demonstrates my person and office making no difference to be accountable to members of the Association, National Executive Council and AMCON.
10. On the 10th of August, 2012, on getting to the office of the Head, Admin and Finance Department, I saw the Treasurer recommending me for the Annual General Conference to the President. This is usually a responsibility reserved for the office of the General Secretary who is the second signatory to the account, and customarily the office to vet and recommend memos to the president for his approval – a duty which was affirmed by the President in the last Annual General Meeting of 2012. This is a fact which I have carried out since the inception of the administration to ensure that the members of the Association are judiciously satisfied, before all these were done by the President in a bid to intimidate me and to undermine my office.

10. I received letters from some members of our Association asking for the notices to be withdrawn or we face court action. These letters were forwarded to the President by me, but he did not respond. I made several calls to the President to enable us discuss the way forward or to call for an emergency meeting to discuss the issues raised in the letters, but he neither picked nor returned any of the calls. **I also sent the Pre-Conference NEC Notice to him, but he failed to acknowledge same, and I had no choice but to send it to members because we were running out of time.**

1. On the 11th of August, 2002, I went to see the President in his office and to my astonishment his secretary informed me that the President had given instruction that she should not let me in whenever I came to see him. When I found my way into his office, I saw and heard a vicines President screaming at the top of his voice that I should leave his office. I had no choice that to leave his office without being able to discuss the threat of a law suit and other negative.
2. It was imperative that I withdrew the notices and gave the NIDA any necessary publicity and preventable litigation cost from any potential lawsuits. I sent the Notice of withdrawal to the IT Support staff to disseminate to members, and the neglected failed to do so despite several attempts to get the necessary behaviour of the IT staff, I believe, based on the instruction of the President to the members of staff. Hence, my sending the withdrawal notice through my private email and at my cost.
3. For the avoidance of doubt;
 - a. I am unaware of any meeting where it was decided that the two notices; one issued by the General Secretary on the 27th of July, 2002 and the other issued by the Assistant Secretary on the 28th of July, 2002 would be presented to the Annual General Meeting for a resolution of which should be discussed at the meeting.
 - b. I have nothing against the proposed amendments by the Constitution Review Committee. However, my stance as I told the President and other members of Exco that the Proposed Amendment did not meet the sixty (60) days requirement of the Constitution.

I will always stand for the truth and the best interest of the Association even if it means standing alone. I am not a political appointee; I contested for the office of the General Secretary and won

by your votes and God's mercies. The duties of my office are well defined, and I will uphold the provisions of the Constitution which I swore to uphold.

Thank you.



**Joyce Oduah, FICMC
General Secretary, NBA**

11th of June, 2022

The General Secretary,
Nigerian Bar Association,
National Secretariat,
NBA House, Plot 1101 Muhammadu Buhari Way,
Central Business District, Abuja, F.C.T., Nigeria.

Dear Madam,

Whereas Section 23 (8) of the Nigerian Bar Association (NBA) Constitution provides that "Ten (10) percent of Bar Practising Fee paid by members of each Branch shall be allocated to the Branch for the maintenance of its premises and other facilities for the next year."

Whereas by a resolution passed at the meeting of the NBA National Executive Council (NEC) on the 10th of June, 2022 held in Ikorin, Kwara State, the NEC resolved that the monthly constitutional revision is increased from Ten (10) percent to Twenty (20) percent;

Pursuant to Section 25 of the constitution, we hereby notify your office of the proposed amendment of the said provision of the Constitution as resolved by NEC for the increase of the remittance to branch to twenty (20) percent by amending the said Section 23 (b) in the following manner:

"Twenty (20) percent of Bar Practicing Fee paid by members of each Branch shall be remitted to the Branch in the month of April and December of each year".

Undersigned for themselves and on behalf of all the Chairmen of Branches of the Nigerian Bar Association.

Thank you.

Yours faithfully,

1. Ikechukwu Uwuoma, Esq. NBA Lagos chairman - Hhuu
2. M.T. Mohammed, Esq. NBA Kaduna chairman - Rommish
3. Ahmed Turbowo Esq. NBA Gombe chairman. A

UKPAI UKAIRO & ASSOCIATES
(Barristers • Solicitors • Arbitrators • Mediators)

NDE UDO CHAMBERS,
VALUE LIFE,
B16, Pound Road, (By Adazi) Aba,
08033382685
e-mail: ukepalukairoendassociates@yahoo.com

Our Ref: Vol.22/A/1/80 Your Ref: 01/08/2022

The General Secretary,
Nigerian Bar Association,
Plot 1102 Muhammad Buhari Way,
Cadestral Zone ADO,
Central Business District Area,
Abuja.

Dear Sir,

DEMAND TO WITHDRAW NOTICES TAGGED "NOTICE OF PROPOSED AMENDMENT OF THE CONSTITUTION OF THE NIGERIAN BAR ASSOCIATION 2015 (AS AMENDED IN 2021)" AND "FURTHER NOTICE OF PROPOSED AMENDMENTS TO THE CONSTITUTION OF THE NIGERIAN BAR ASSOCIATION (2015) AS AMENDED IN 2021" PURPORTING TO GIVE 30 DAYS NOTICE TO DELEGATES TO 2022, ANNUAL GENERAL MEETING OF NBA FOR THE AMENDMENT OF NBA CONSTITUTION AMENDED LAST IN 2021.

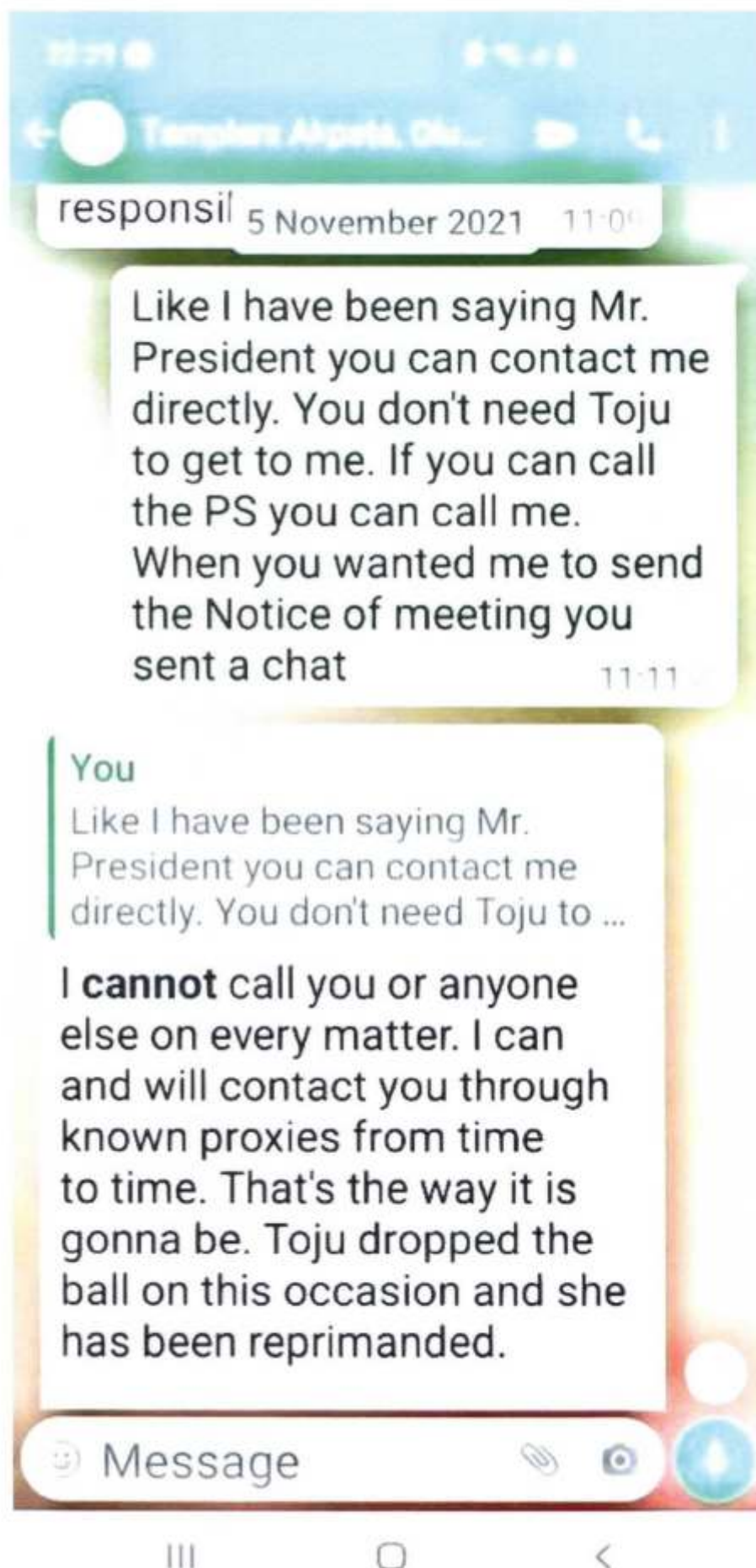
We write for and on behalf of Victor C. Nweso Esq. of No.174 Hospital Road
Aba and Onyemachi Chukwu Esq. of No.48 Okigwe Road, Aba (hereinafter
referred to as our clients) and we have their instructions and authority to
write to you in the following terms:

4. That our Clients are members of the NBA and Delegates to the Annual General Meeting held on Thursday, 25th August, 2021 at the EA Athletic Centre, Loughborough, Leicestershire and their practicing fees and Branch Debt were paid, March 30th 2022.
5. That our clients received notice dated "Notice of proposed Amendment to the NBA Constitution" (the "Notice") on 22nd August 2021, written by your humble self, Joyce Oduor, in your capacity as the General Secretary of the NBA and another, together "Further Notice of Proposed Amendment to the NBA Constitution" (the "Further Notice") dated 22nd August 2021 as amended in 2021 signed by Uthman Naudou, in your capacity as the General Secretary of the NBA and another, together "Notice of Proposed Amendment to the NBA Constitution" (the "Notice") dated 26th and 28th of July 2022 respectively, with several versions of the Notice, which incorporated the Notice, which incorporated the Notice (see recited attached).
6. That it is instructive to note that the notice issued by Uthman Naudou on 26th and 28th of July 2022 is not the Notice issued by your humble self.
7. That both Notices issued by you and the one issued by the Assistant General Secretary appear to serve as notice required by Article 25(3) of the NBA Constitution as amended in 2021 and the Notice issued by your humble self to circulate any proposed amendment to repeal or re-enactment of the NBA Constitution to delegates to the Annual General Meeting for thirty (30) days before the proposed amendment is tabled for discussion at the Annual General Meeting.
8. That the Notice of the proposed amendment and the proposed amendment to the NBA Constitution, our clients observed the following:
 - (i) The Notice and the purported proposed amendment to the NBA Constitution were not received by our clients until the 22nd August 2021 Meeting scheduled to hold on 28th August, 2021 on 27th and on 28th of July 2022, in clear breach of Article 25(3) of the NBA Constitution as amended in 2021. The Notice and the proposed amendment of the Annual General meeting cannot be the conveyance of the Notice for notice required by Article 25(3) of the NBA Constitution.

[illegible][illegible][illegible]

Figure 2 illustrates the structure of the proposed model. The model is designed to handle the input data, which is represented by a green circle with a central node. The input data is processed by a series of layers, including a hidden layer and an output layer, to produce the final result. The model is trained using a specific algorithm, and the results are evaluated using a set of metrics.

AA8



AA9

