

Delivered via email

To:-

**The Officer-in-Charge**  
**Economic and Financial Crimes Commission (EFCC)**  
Lagos Zonal Office  
No. 15A, Awolowo Road  
Ikoyi, Lagos  
Nigeria

**Email:** [info@efcc.gov.ng](mailto:info@efcc.gov.ng)

CC:

**The Managing Director**  
**Sujimoto Construction Limited**  
14B Milverton Road  
Off Alexander Avenue  
Ikoyi, Lagos  
Nigeria

**Email:** [info@sujimotonig.com](mailto:info@sujimotonig.com)

Dear Sir/Madam,

**PETITION AGAINST SUJIMOTO CONSTITUTION LIMITED OVER  
FRAUDULENT MISAPPROPRIATION OF FUNDS TOTALING ₦300,000,000.00  
(THREE HUNDRED MILLION NAIRA ONLY)**

We write on behalf of our client (hereinafter referred to as “the alleged petitioner”) to formally petition against **Sujimoto Constitution Limited** for acts bordering on financial fraud, criminal breach of trust, and obtaining by false pretences—all in contravention of the laws of the Federal Republic of Nigeria.

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**FACTS OF THE CASE:**

On **May 3, 2024**, the alleged petitioner invested the sum of **₦300,000,000.00 (Three Hundred Million Naira Only)** with **Sujimoto Constitution Limited** based on a **signed investment offer letter**. The agreement guaranteed a **35% Return on Investment (ROI)** within a period of **one year**.

Subsequently, **Sujimoto Constitution Limited** issued a **formal company guarantee**, acknowledging receipt of the full investment amount and further committing to the repayment of both the capital and the agreed ROI upon maturity.

Despite the clear and unambiguous terms of the investment, and repeated demands by the petitioner upon maturity of the agreement, **the company has failed and refused to honour its commitments**, repay the invested capital, or remit the agreed return. No explanation or lawful restructuring proposal has been offered to justify this default.

The actions of Sujimoto Constitution Limited amount to a **deliberate act of fraud and misappropriation**, orchestrated under false pretences, with the aim of unjustly enriching itself at the expense of the petitioner.

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## **APPLICABLE LEGAL BREACHES:**

The following statutory provisions have been violated:

- **Section 312 of the Criminal Code Act, Cap C38, LFN 2004** – *Criminal breach of trust.*
  - **Section 419 of the Criminal Code Act** – *Obtaining property or credit under false pretences.*
  - **Section 1 of the Advance Fee Fraud and Other Fraud Related Offences Act, 2006** – *Prohibits any scheme designed to obtain money from others by promising future benefits or returns without intent to deliver.*
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## **RELIEFS SOUGHT:**

In view of the foregoing, we respectfully request that your esteemed office:

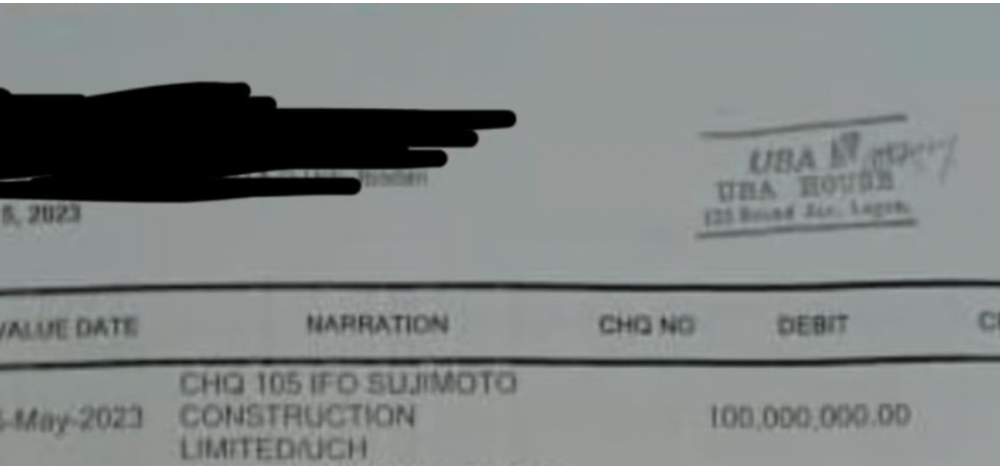
1. **Investigate Sujimoto Constitution Limited and its principal officers** for fraudulent misappropriation of funds and breach of contractual trust.
  2. **Prosecute all persons found culpable** under the appropriate laws.
  3. **Compel the immediate refund of ₦300,000,000.00** as well as the agreed 35% ROI to the petitioner.
  4. Take **preventive and corrective measures** to deter similar fraudulent schemes and protect the investing public.
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## **ATTACHED DOCUMENTS:**

- **Signed investment offer letter** dated May 3, 2024.
- **Company guarantee** confirming receipt and repayment obligation.
- **Proof of payment** of ₦300,000,000.00 (e.g., transfer receipts, bank statements).
- Relevant **correspondence** related to the investment and default.

We trust that your office will take urgent steps to address this case in the interest of justice and public accountability.

Yours faithfully,  
**[Your Name or Law Firm's Name]**  
*On behalf of the Alleged Petitioner*



VALUE DATE	NARRATION	CHQ NO	DEBIT	C
May-2023	CHQ 105 IFO SUJIMOTO CONSTRUCTION LIMITED/UCH		100,000,000.00	

# SUJIMOTO

14B, Milverton Rd, Off  
Alexander Avenue, Ikoyi

3<sup>rd</sup> May 2023

01-454 4634  
0809 124 3555

Dear Sir,

## **Sujimoto Investment: Offer Letter for N300 Million Investment (Diamond Package)**

Further to our conversation, we are pleased to make you an investment offer of **35% ROI for 1 year** in our Sujimoto Project.

Sujimoto Investment is Africa's biggest co-ownership initiative, aimed at enriching investors through a profit-sharing scheme powered by Nigeria's Biggest Luxury Real Estate brand – Sujimoto. This initiative is focused on giving investors an incredible opportunity to own a piece of Sujimoto by investing and get an ROI of up to 50% in 2 years.

Please find below a concise breakdown of our offer:

**Investment Type: N300 Million Investment - Diamond Package**  
1 Year Investment Plan at 35% ROI

### Investment & ROI Breakdown

INVESTMENT AMOUNT	DURATION	ROI%	ROI (N)	TOTAL (N)
N300 MILLION	1 YEAR	35%	N105 MILLION	N405 MILLION

### Payment Details

Bank Name: Sujimoto Construction Limited  
Account Number: 2963662058  
Bank: FCMB

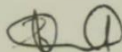
Bank Name: Sujimoto Construction Limited  
Account Number: 1405162474  
Bank: Access

Bank Name: Sujimoto Construction Limited  
Account Number: 1019547047  
Bank: UBA

Thank you for your interest in investing in Sujimoto.

Yours faithfully,

For: Sujimoto Construction Limited



Dr. Oluşijibomi Ogunde  
Managing Director (CEO)

3<sup>rd</sup> May 2023

Dear Sir,

## COMPANY'S GUARANTEE ON INVESTMENT

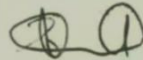
This letter will serve as a notification that SUJIMOTO INVESTMENT (hereinafter referred to as 'Company') will honor and guarantee payment of any post-dated cheque written in your name, [REDACTED] hereinafter referred to as 'Client') and up to the amount of **N300,000,000.00 (Investment plus 35% ROI)** or such further amount as may be issued to the Client and drawn on account number [REDACTED] account name [REDACTED] and bank name: **Access Bank Plc, UCH Branch, Ibadan.**

The Company's liability to the Client shall be extinguished immediately the amount due is fully paid or where the Client communicates an intention to discharge the company from this guarantee.

This communication will serve as a continuing security that will cover and secure the investment as it relates to the transaction contemplated by this notification only.

Accept the assurances of our highest regards.

For: Sujimoto Investment



Dr. Olasijibomi Ogundele  
MD / CEO

[REDACTED] IFO SUJIMOTO	FJB23124980829	04-May-2023	50,000,000.00
INSTRUCTION LTD @UCH IBADAN BRANCH	51		
[REDACTED] A.O.429961 IFO SUJIMOTO	FJB23124980827	04-May-2023	50,000,000.00
INSTRUCTION LTD @UCH IBADAN BRANCH	38		
[REDACTED]	00001423050418	04-May-2023	5,010.75
[REDACTED]	10402519097064		
[REDACTED]	72		

O.429961 @UCH IBADAN BRANCH	TRN: FJB23124980815 21		
[REDACTED]	FJB23124980855	04-May-2023	50,000,000.00
INTERP IFO SUJIMOTO CONSTRUCTION LTD @UCH IBADAN BRANCH	68		
ing Balance		04-May-2023	0.00
[REDACTED]	FJB23124981156	04-May-2023	0.00
[REDACTED] SUPPORT AND CARE	67		
[REDACTED]	FJB23124981189	04-May-2023	50,000,000.00
ERPRISES IFO SUJIMOTO CONSTRUCTION LTD	54		
CH IBADAN BRANCH			
ing Balance...			