

IN THE CHIEF MAGISTRATE COURT OF KADUNA STATE OF NIGERIA  
IN THE KADUNA MAGISTERIAL DISTRICT  
HOLDEN AT KADUNA

BETWEEN

THE STATE ..... REGISTRAR ..... CHIEF MAGISTRATE ..... COMPLAINT

AND

ALHAJI IBRAHIM MUHAMMAD AMINU..... DEFENDANT

TO THE REGISTRAR;  
CHIEF MAGISTRATE COURT  
IBRAHIM TAIWO ROAD, KADUNA

APPLICATION FOR CRIMINAL DIRECT COMPLAINT

Please cause a criminal summons to be issued against the above named defendant for the offences of Forgery of Public Seal, Forgery, Using as Genuine False Documents, Making or Possessing Counterfeit seal with intent to commit Forgery and Violation of Official Secret Act all under Section 346, 343, 347, 348 of the Penal Code Law of Kaduna State 2017 and under the official Secret Act in the following terms;

The Defendant (Alhaji Ibrahim Muhammad Aminu) is the Wazirin Zazzau and the Chairman Zazzau King Makers Committee and in such capacity had actively participated and as the chairman of the selection process of the new Emir of Zazzau held on the 24<sup>th</sup> day of September, 2020 and in that capacity released information regarding the proceedings of the selection exercise to unauthorized persons in complete violation of the Official Secret Act.

The Defendant in his capacity as the chairman Zazzau king maker's Committee also got access to copies of letters addressed to the Commissioner for Local Government, affixed his signature on it confirming the document as a certified true copy (C.T.C) thereby making a false document and Forgery of a Public Seal and thereafter handed the documents to unauthorized persons.


The Defendant by the above stated Acts has committed the offenses of:

- 1 Forgery of Public Seal contrary to Section 346 (a) & (b) of the Penal Law of Kaduna State 2017.
- 2 Forgery and making of False Documents with intent to cause damage or injury to the public to support any claim of title under Section 344 of the Penal Law of Kaduna State 2017.
- 3 Using as Genuine False Documents by using as genuine a document which he knows and has a reason to believe is a forged document contrary to Section 347 of the Penal Law of Kaduna State 2017.
- 4 Making or Possessing Counterfeit seal with intent to commit Forgery by making counterfeit seal or other instrument for making an impression intending that the same shall be used for the purpose of committing forgery contrary to Section 348 of the Penal Law of Kaduna State 2017.

- 5 Violation of Official Secret Act by releasing official documents to unauthorized persons in complete violation of the Official Secret Act.

Dated this 16<sup>th</sup> Day of December, 2020



  
Aisha Dikko, Esq.,  
Bayero Dari, Esq.  
H. D. Bijimi, Esq.  
Ministry of Justice Kaduna

**FOR SERVICE ON THE DEFENDANT**

Alhaji Ibrahim Mohammed Aminu  
Zazzau Emirate Council,  
Emir's Palace,  
P.M.B 1073, Zaria.

ORIGINAL

### JUDICIAL FORM 2

SECTION 47, 154 - CPC  
KASHI NA47, 154 - CPC

NORTHERN REGION OF NIGERIA  
JHAR AREWA TA NIGERIYA

In the C.M.C. I Court of Ibrahim Taiwo West London

Between The State Complainant  
Maikara

And  
Da  
Alh. Ibrahim Muhammad Aminu Defendant  
Wanda aka yi kara

#### SUMMONS TO AN ACCUSED PERSON

Kiran Wanda Ake- Tuhuma

To Alh. Ibrahim Muhammad Aminu Of Zaria, An. Enriate Council Enriate  
Zuwaga P.M.S 1073, Mutumfi

WHEREAS your attendance is required to answer to a charge of Official Secret Act  
Ana bukatan ka zo ka bada ansar cajin da aka yo make kan laifin

Under Section 346, 348, 347, 348 (State of Offence)  
A rubuta laifin

Concisely with time and place) you are hereby summoned to appear in person before.....  
A takaice da lokaci da wuri) ana bukatan ka zo da kanka gaba ga kotu

At Ibrahim Taiwo Rd On the 15<sup>th</sup> Day of Feb 2021 At 8:30 O'Clock  
Ranar Watan

Dated this 2<sup>nd</sup> Day of Feb 2021  
An Rubuta Watan

MAGISTRATE  
SIGN  
Signature or Seal  
IBRAHIM TAIWO RD. KAD