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13 May 2022

**The National Chairman,**  
Young Progressives Party (YPP),  
Block 10, Flat 1, Benue Crescent,  
By Diplomats Park, Area 1 Section 1,  
Garki-Abuja.

Received by me Princess  
Marius  
P.P.A. 17/05/2022

Dear Sir,

## **DISCRIMINATION, VICTIMIZATION AND UNCONSTITUTIONAL EXCLUSION OF BARR. C. C. OZUMBA FROM YPP'S ELECTIONEERING PROCESS TOWARDS 2023 GENERAL ELECTIONS**

### **PASSIONATE APPEAL FOR URGENT INTERVENTION**

We have been briefed and our professional services retained by **C. C. Ozumba Esq.** whom we shall hereinafter referred to as 'Our Client' and on whose definite and direct instruction we write thus:

1. Our Client is a registered member of Young Progressives Party (YPP) in Ukpo Ward III in Dunukofia Local Government Area (L.G.A.), Anambra State with Membership Card No. **YPP/ANAMBRA/00266** duly signed by the National Chairman and Secretary, and Ukpo Ward III Chairman and Secretary.
2. Our Client was the immediate past Secretary of YPP, Anambra State, a position he duly resigned, in line with the Constitution of Nigeria and Constitution of YPP, on the 6<sup>th</sup> day of April 2022. His resignation was duly communicated to the National and Anambra State Secretariats of YPP. Our Client's decision to resign as the Anambra State Secretary, YPP was informed by his aspiration to run for Dunukofia Constituency seat in the Anambra State House of Assembly in the forthcoming 2023 General Election as the candidate of YPP.
3. In pursuit of the said aspiration, Our Client, while in company of Hon. Peter Ozumba (Vice Chairman YPP Anambra State), Hon. Obi Emeka (Deputy Secretary YPP Anambra State), Chief Maduchie Godwin (YPP Chairman Dunukofia L.G.A), Chief Emeka Makachi (Anambra Central YPP Zonal Officer) and other supporters, visited the National Secretariat of the YPP on **11/05/2022** to purchase Nomination and Expression of Interest Forms for Anambra State House of Assembly Election 2023.



4. To the greatest shock of Our Client and his supporters, the National Secretary and National Organizing Secretary refused selling/issuing the said forms to Our Client on the unfathomable ground that **Sen. Ifeanyi Ubah**, to your knowledge and approval, instructed that Nomination and Expression of interest Forms should not be sold/issued to Our Client. They insisted and asserted that **Sen. Ifeanyi Ubah** is not happy with Our Client over his role in nominating **Hon. Dr. Okey Eze** as the YPP Deputy Governor candidate in the last Anambra State Gubernatorial Election. As a result, the stated party officials directed Our Client to first seek and obtain approval from **Sen. Ifeanyi Ubah** before the said forms will be sold/issued to him.
5. Our Client enquired to know if **Sen. Ifeanyi Ubah** or any other person had formally written a petition against him or laid an official complaint to YPP National Secretariat to which he – Our Client – needs to react/respond to, but no such petition or complaint was made or subsisted.
6. As a true and a loyal party man, Our Client yielded to the directive of the YPP National Officers and consequently made frantic efforts to reach **Sen. Ifeanyi Ubah** to chart a peaceful resolution. Our client placed calls (Whatsapp and normal calls), sent SMS and voice notes to **Sen. Ifeanyi Ubah** passionately appealing for reconciliation to enable him obtain the said forms but his appeals were rebuffed and indeed proved abortive as **Sen. Ifeanyi Ubah** treated him with absolute disdain and neglect.
7. Our client is now traumatized, crestfallen and dejected by the facts of this unwarranted and unconstitutional conspiracy, discrimination, exclusion and rejection by **Sen. Ifeanyi Ubah in concert or connivance with some National Officers.**
8. It is Our Client's instruction to call to your kind attention and the entire members of YPP National body of his immense contributions to the development of the party in Anambra State. It is on record that our client:
  - I. Personally paid for all YPP Offices in Dunukofia L.G.A of Anambra State.
  - II. Personally sponsored the first ever Anambra State Secretary Convention, where he hosted all the State, Zonal, L.G.A. and Ward Secretaries of the YPP, Afaigboefuna, IUSM, Active voters and Mr. Infrastructure. This was done in a bid to motivate the party Secretaries towards the actualization of Project Ifeanyi Ubah and YPP.



- III. Donated ₦20,000 to each of the 14 wards in Dunukofia L.G.A during the last Anambra State YPP registration and also ensured that refreshment was regularly provided for those conducting the registration exercise.
  - IV. With the support/help of Hon. Peter Ozumba, delivered Ukpoko ward III to YPP in the last Anambra Gubernatorial Election, 2021.
  - V. Spent millions of Naira of his personal money in the said gubernatorial election without demanding kobo from Sen. Ubah.
  - VI. Donated YPP customized T-shirts to YPP secretaries and assistants in Anambra State.
  - VII. Brought high caliber men to the party. Just to mention but a few.
9. It is, therefore, disheartening and demoralizing that in spite of the above contributions, Our Client would be so poorly and inhumanly treated by Sen. Ifeanyi Ubah, some members of YPP Anambra State Chapter and even National Officers. This is notwithstanding that Our Client is a qualified member, a fit and proper person and it is within his constitutional rights both in the Party and the Country to obtain Forms of YPP and aspire for political positions in Nigeria.
  10. Kindly be informed that, the refusal to allow our client buy/pick the said forms on baseless, unsubstantiated and unmeritorious allegations leveled against him by **Sen. Ifeanyi Ubah** do not only infringe on Our Client's right as a member of the YPP but also his fundamental human rights as provided in Chapter Four of the 1999 Constitution of Federal Republic of Nigeria, as amended.
  11. **Fair Hearing:** Our Client was not given any opportunity to present or defend himself against whatever baseless allegation or grouse **Sen. Ifeanyi Ubah** has against him and this infringes on his fundamental human right as provided in Section 36 (1) of the 1999 Constitution and also **Article 36 (1) & (6) of the YPP Constitution 2017 (as amended in 2020)**.
  12. May we for purpose of clarity supply the provision of Article 36 of the **YPP Constitution 2017 (as amended in 2020)**

**"Article 36: DISCIPLINARY PROCEDURE**

36.1 *Subject to the provisions of this Constitution, there shall be a Disciplinary Committee of the Party at every level consisting of seven members with proven integrity, one of whom shall have a legal*



*background. The Legal Adviser or his/her nominee shall be a member of the committee except where the Legal Adviser is the one facing the committee.*

*36.2 The Disciplinary Committee shall be appointed by the appropriate Executive Committee of the Party.*

*36.3 The Working Committee, at any level of the Party, and the Executive Committee (at the Ward Level) may, after preliminary hearings, suspend a member from the Party for a period not exceeding one month, during which period the member so suspended shall lose his right of contest any election, and shall be referred to the appropriate Disciplinary Committee.*

*36.4 Where an allegation is made against a member of the Party, the Disciplinary Committee shall inform the member in writing of the allegations made against him and the place and time of hearing the case against him or her.*

*36.5 A member who appears before a Disciplinary Committee shall be given opportunity to present his case orally or in writing either in person or through a counsel of his choice and shall be allowed to call witnesses.*

*36.6 Any decision taken against a member who has not been informed of the charges against him or has not been given any opportunity of defending himself shall be null and void."*

**13. Right to peaceful Assembly/Association and Freedom from Discrimination:** Our Client's Right to Peaceful Assembly and Association and Freedom from Discrimination provided in Sections 40 and 42 of the 1999 Constitution (as amended) was also infringed on by this uninformed decision to refuse him the right of purchasing the said forms.

**14. Right as a YPP member to represent the party in elections:** As a member of Young Progressives Party Our Client has earned the right to purchase nomination form to vie for Anambra State House of Assembly Dunukofia Constituency, participate in the resultant primaries (if any) and represent (if successful in the primaries) the Party as her candidate in general election. This right will be prematurely murdered, by the refusal to allow Our Client purchase and pick the said requisite forms and this is against the provisions of **Article 32 of the YPP Constitution.**



15. We further invite your attention to **Article 11** of YPP Constitution which deals on "**Party Member's Interest**" and which states thus:

*"The interest of the party members shall be considered in every decision and policy that will be taken by any organ of the party at any level whether National, Zonal, State, Local Government or Ward level.*

*Without prejudice to the interest of any party member, every organ of the party must adhere to the ideology and philosophy of the party at all times".*

16. **IT IS MOST PERTINENT THAT YOU FINALLY NOTE HONOURABLE CHAIRMAN:**

- I. *That **Sen. Ifeanyi Ubah** (even as the National leader of the party) has no constitutional right, justification or backing to direct the National Body of YPP not to issue or sell Nomination and Expression of Interest Forms to our client or to any other person.*
- II. *That the Young Progressives Party is a national party recognized by INEC, as such, it is not a personal property of **Sen. Ifeanyi Ubah** or any National Executive Member to treat or deal with other members of the party contemptuously or as it pleases them.*
- III. *That our client as a party member and an aspirant enjoys the same rights and share same obligations as **Sen. Ifeanyi Ubah** in the YPP.*
- IV. *That assuming there is any formal petition against our client from **Sen. Ifeanyi Ubah**, our client ought to be given fair hearing before such a far-reaching and drastic decision to exclude him from the electioneering process of YPP would be reached.*
- V. *That it is unconstitutional, against the philosophy/ideology of the YPP, discriminatory, unfair and prejudicial for the National body/officers of YPP to have directed our client to meet and seek the consent of **Sen. Ifeanyi Ubah** before Nomination and Expression of Interest Form will be sold/issued to him.*
- VI. *That it is unconstitutional, unlawful, against the philosophy/ideology of the YPP, discriminatory, unfair, prejudicial and traumatic for the National body of YPP to have refused to sell/issue the said Forms to our client in the circumstances.*



**17. PRAYER:** It is, consequently, Our Client's request/prayer that you direct the National Organizing Secretary and National Secretary (or whosoever is responsible) to do the needful and allow our client purchase The YPP Nomination and Expression of Interest Forms to contest the primaries (if any) and represent the party (if successful in the primaries) as her candidate for election into Anambra State House of Assembly Dunukofia Constituency in the 2023 General Election. In the absence of prompt and appropriate redress as requested by Our Client, he may seek further redress in court with requisite jurisdiction.

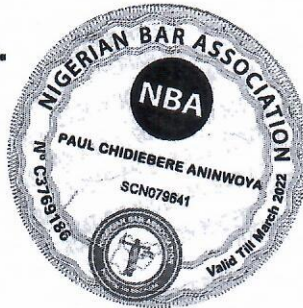
Please accept, Honourable Chairman, the assurance of our high regards, as we anticipate your kind, prompt and appropriate intervention and redress.

Yours faithfully,

PP: FERD ORBIH (SAN) & CO.



C. P. Aninwoya, Esq.



CC:

1. Young Progressives Party Board of Trustees
2. Young Progressives Party Anambra State Working Committee
3. Young Progressives Party Anambra State Chairman - Chief Obi Moses
4. Young Progressives Party Anambra State Acting Secretary - Obi Emeka
5. Young Progressives Party Chairman Anambra Central - Hon. Peter Ozumba
6. Young Progressives Party Chairman Dunukofia - Chief Maduchie Godwin
7. Young Progressives Party Chairman Ukpo Ward III
8. Sen. Ifeanyi Ubah
9. Young Progressives Party Anambra State Deputy Governor Candidate - Prince Dr. Okey Eze