



14th January, 2026

The Executive Council of Ogun State,
Government House,
Oke-Mosan,
Abeokuta,
Ogun State.

Through:
Hon. Commissioner for Local Government
and Chieftaincy Affairs,
Abeokuta,
Ogun State.

Dear Sir,

PETITION AGAINST THE WRONGFUL EXCLUSION OF ALHAJI WASIU ADEWALE OLASUNKANMI ADESANYA AND OTHER ELIGIBLE MEMBERS OF FUSENGBUWA RULING HOUSE ON THE 12TH OF JANUARY 2025 AT THE NOMINATION OF CANDIDATES FOR THE VACANT STOOL OF AWUJALE OF IJEBU LAND.

The above subject refers.

We remain Solicitors to MR. WASIU ADEWALE OLASUNKANMI ADESANYA (hereinafter referred to as "Our Client"), and on his firm instructions, submit this petition for the urgent intervention of the Executive Council. This petition supplements our earlier communications to Your Excellency, dated December 23, 2025, and another letter raising concerns about illegal activities within the Fusengbuwa Ruling House.

Our Client is an acknowledged and eligible member of the Fusengbuwa Ruling House and an aspirant to the vacant stool of the Awujale of Ijebu Land. This petition addresses the grave procedural irregularities and the unlawful exclusion of Our Client and other legitimate members from the nomination meeting of the Fusengbuwa Ruling House held on January 12, 2026, which actions fundamentally undermine the integrity of the selection process for the revered Awujale stool.

FACTUAL BACKGROUND OF THE UNLAWFUL EXCLUSION

Following the demise of His Royal Highness Oba Dr. Sikiru Kayode Adetona, it became the turn of the Fusengbuwa Ruling House to present candidates for the Awujale stool. The Secretary of Ijebu Ode Local Government, by a letter with Ref: 10LJ584/11/34 dated 6th January 2028, inviting members of the Fusengbuwa Ruling House to convene a statutory meeting for the nomination of candidates. This directive was issued in line with the customary laws of Ijebuland and the Chieftaincy Regulations of Ogun State.

However, on January 12, 2026, at Bisrod Hotel, Ijebu Ode, at the designated venue for the nomination exercise, Our Client and numerous other eligible members of the Fusengbuwa Ruling House were deliberately excluded and prevented from entering. Heavily armed security personnel, including the Nigerian Police and other security operatives, were reportedly stationed at the venue and were used to disenfranchise legitimate members. Entry to the meeting was restricted by the issuance of special entry cards, purportedly to "delegates" selected by a faction within the ruling house. This system of "delegates" was unilaterally introduced and was never agreed upon by Our Client or other disenfranchised members, who maintain their right to attend and participate directly in the statutory meeting of the Ruling House.

This deliberate obstruction prevented Our Client and others from exercising their fundamental right to participate in the nomination process for the Awujale stool. Please find attached herewith a flash-drive detailing some of the atrocities / violations that occurred in the course of the referred meeting where our client and some of the accredited members of the family were denied entry into the venue of the statutory meeting.

LEGAL IMPLICATIONS AND CAUSE OF ACTION

The actions of the leadership of the Fusengbuwa Ruling House, in collaboration with security forces, constitute a clear contravention of established legal principles and statutory provisions governing chieftaincy affairs in Ogun State, as well as fundamental human rights:

1. BREACH OF THE OBAS AND CHIEFS LAW OF OGUN STATE 2021:

The Obas, Chiefs, Council of Obas and Traditional Council Law of Ogun State, 2021, provides for an approved method for the selection, appointment, and recognition of Obas and Chiefs. Section 16(1)(f) of the Law explicitly requires the Ruling House to submit names of candidate(s) "nominated at a meeting of the Ruling House" to the kingmakers. The unilateral exclusion of eligible members, and the imposition of a "delegate" system without due process, directly contravene the spirit and letter of this law, which emphasizes transparency and a proper administrative framework to curb chieftaincy disputes. The purported nomination exercise based on such an exclusionary process is fundamentally flawed and legally unsustainable.

2. VIOLATION OF THE AWUJALE OF IJEBULAND CHIEFTAINCY

DECLARATION: The Chieftaincy Declaration governing the Awujale stool, which outlines the customary rules for succession, equally mandates an inclusive and fair nomination process. Any deviation, such as the arbitrary exclusion of eligible members, renders the process inconsistent with the Declaration.

3. BREACH OF CONSTITUTIONAL RIGHT TO FAIR HEARING:

The deliberate exclusion of Our Client and other members from the nomination meeting is a blatant violation of their fundamental constitutional right to fair hearing, as guaranteed by Section 36(1) of the Constitution of the Federal Republic of Nigeria 1999 (as amended). This right applies to the determination of civil rights and obligations, including chieftaincy matters.

The principle of audi alteram partem (hear the other side) is a cornerstone of natural justice, dictating that no person shall be condemned unheard. The Supreme Court has consistently held that decisions made without affording a party the opportunity to be heard are null and void, irrespective of whether such a provision is explicitly stated in a statute. In *Kotoye v. Central Bank of Nigeria* (1989) 1 NWLR (Pt. 98) 419, the Supreme Court emphasized that fair hearing requires that "every reasonable and fair minded observer who watches the proceedings should be able to come to the conclusion that the court or other tribunal has been fair to all parties concerned."

Similarly, the principle established in *Longe v. F.B.N. Plc.* (2010) 6 NWLR (Pt. 1189) 1, though in the context of corporate law, underscores the legal invalidity of decisions

made at a meeting where a party whose rights are affected was deliberately excluded or not properly notified. Our Client, having a clear interest in the Awujale stool as an aspirant and a member of the Ruling House, was entitled to participate in the nomination process, and his exclusion is a grave procedural defect.

4. REPUGNANCY TO NATURAL JUSTICE AND CUSTOMARY LAW:

The actions of the Fusengbuwa Ruling House leadership are repugnant to the principles of natural justice, equity, and good conscience. Customary law, as recognized in Nigeria, must not conflict with fundamental human rights or statutory provisions. The arbitrary disenfranchisement of eligible members from participating in a communal process as significant as chieftaincy nomination is against established notions of fairness and legitimate customary practice.

5. UNLAWFUL EXERCISE OF AUTHORITY:

The imposition of a "delegate" system and the physical exclusion of members by a faction within the ruling house constitute an arbitrary and ultra vires exercise of authority, undermining the statutory duties of the ruling house to conduct an open and transparent nomination.

CONSEQUENCES OF THE IRREGULARITIES

The nomination exercise purportedly conducted on January 12, 2026, without the full and free participation of all eligible members of the Fusengbuwa Ruling House, including Our Client, is procedurally defective, unlawful, and consequently null and void. Any outcome from such a flawed process cannot stand and will inevitably lead to protracted litigation and further communal unrest, which the Obas and Chiefs Law 2021 was designed to prevent.

RELIEFS SOUGHT

In the overriding interest of justice, peace, and the preservation of the sanctity of traditional institutions in Ogun State, we respectfully urge the Executive Council of Ogun State to:

1. DECLARE the purported nomination exercise conducted by the Fusengbuwa Ruling House on January 12, 2026, as null, void, and of no effect whatsoever, owing to the

fundamental breaches of statutory provisions, constitutional rights, and principles of natural justice.

2. DIRECT a fresh, transparent, inclusive, and fair nomination exercise for the Awujale stool, ensuring that all eligible members of the Fusengbuwa Ruling House, including Our Client, are accorded their right to participate without any form of inhibition or discrimination.

3. ENSURE strict compliance with the provisions of the Obas and Chiefs Law of Ogun State 2021, the Awujale of Ijebuland Chieftaincy Declaration, and the principles of natural justice in all further stages of the selection process.

4. PREVENT any unlawful exclusion of Our Client and other bona fide members of the Fusengbuwa Ruling House from participating in any future nomination meetings or processes for the Awujale stool.

NOTICE OF INTENDED LEGAL ACTION

TAKE NOTICE that should urgent and appropriate steps not be taken by the Executive Council to address these legitimate grievances within a reasonable time, Our Client reserves the unequivocal right to seek redress before competent courts of law and other appropriate authorities, without further recourse or notice. This petition is submitted without prejudice to Our Client's rights under the Constitution, customary law, and all other applicable laws.

SCHEDULE HERETO

Names of members of the family prevented from entering the venue of the nomination exercise:

1. Prince Adetayo Abayomi Oduneye
2. Prince Adeyemo Ridwan Afolohunso Oduneye
3. Prince M. O. Alatishe
4. Princess Adetoun Oduneye Prince Adebambo Oduneye
5. Prince Ashiru Saheed Orisanmi
6. Prince Adesanya Johnson Adekunle
7. Prince Adesanya Adetayo
8. Prince Tunde Banjo

9. Prince Orekoya Adekitan
10. Princess Bolanle Ashiru
11. Prince Olalekan Olubanjo
12. Princess Temitope Ashiru
13. Prince Saidat Ashiru
14. Prince Adebola Adesanya

We trust in the commitment of Your Excellency and the Ministry of Local Government and Chieftaincy Affairs to justice, fairness, and the preservation of the integrity of traditional institutions in Ogun State.

Yours faithfully,



Dr. Wahab Shittu, SAN.

Cc.

- 1. Hon. Comm. For Chieftaincy Affairs**
- 2. Hon. Attorney General of Ogun State.**
- 3. The Kingsmaker**
- 4. Secretary of Ijebu-ode Local Government**
- 5. Fusengbuwa Ruling House**