

2022 JAN 10 P 1:50

Monday, January 10, 2022.

The Managing Director,
Access Bank Plc,
14/15, Prince Alaba Abiodun Street,
Oniru Road,
Victoria Island,
Lagos.

Dear Sir,

**COMPLICITY, CONNIVANCE, LACK OF DUE PROCESS, NEGLIGENCE,
LEADING TO FRAUDULENT TRANSACTIONS AGAINST ZOOMLIFESTYLE;
DEMANDS FOR IMMEDIATE RESTITUTION AND ACTIONS.**

We are solicitors to **TRUTHWARE SOLUTION LIMITED** the owner of **ZOOMLIFESTYLE**, an online lottery company dully registered and licensed to do business in Nigeria (hereinafter referred as "our client") on whose instruction we write to you.

Our Brief:

It is on record that various customers of **Access Bank Plc** through the instrumentality or lapse of your bank, have continued to defraud unsuspecting customers of our client of their hard earned monies, by running accounts in the name of **Mr. Peter Okoye**, a renowned Artiste, and one of the **PSQUARE** brothers, who is the face of **ZOOMLIFESTYLE**. These actions has whittled the integrity of the company and reduced the customer base, growth and earnings of our client to say the least.

It is also on record that our client made various efforts to reach out to your bank on different occasions, informing you of these nefarious activities, after which no positive result was achieved and the situation worsened by the day.

It is a common knowledge, and we stand to be corrected that, to open and operate an account in any bank in Nigeria, the basic requirements must be

complied with, which includes but not limited to biometrics of the account holder, the valid means of identification, corresponding address, photograph of the account holder, and most prominent, the Bank Verification Number **BVN**. It is also pertinent to observe that, the intention of the Central Bank of Nigeria (CBN) for introducing the BVN is to enable the banks the ease of knowing their customers among other Know-Your-Customer (KYC) requirements. In the circumstance of a Limited Liability or Corporate Entity, there are others and/or more requirements added to the above stated, preceding the opening of an account.

It is then worrisome to wonder how these accounts were operated in the name of **PETER OKOYE PSQUARE**". Even though the name "Peter Okoye" is not an exclusive preserve of our client, it is suspicious for the word "**PSQUARE**" to be added to a name when it is a notorious fact that the word '**PSQUARE**' is a popular brand and a Mark belonging to a duo and not a name of an individual. We are also curious to know the basic requirements satisfied by the account holders before the accounts were allowed to be operated by them, vis a vis the verifying identities and corresponding addresses etc.

These accounts were used to defraud subscribers of the ZOOMLIFESTYLE on repeated occasions pretending to be **Mr. Peter Okoye**. To wit; **MR. P ZOOMLIFESTYLE GIVE AWAY ACCOUNT NUMBER 1497139596, ACCOUNT NAME PETER OKOYE PSQUARE. BABATUNDE JOHNSON ACCOUNT NUMBER 1507690648. PETER OKOYE PSQUARE ACCOUNT NUMBER 1490513249**. There are about twelve (12) more accounts to say the least.

We reiterate the fact that, these fraudulent activities has affected the integrity, income and reputation of our client. Our client, **Mr. Peter Okoye** has been accused by these customers of defrauding them of their hard earned monies. The obvious adverse effect on the business of our client is near the state of comatose. The graphic trajection from the inception till when your customers attacked our client will be presented at the necessary time.

OUR CLIENT'S DEMANDS:

Our client demands that within seventy two (72) hours of service of this letter at your head office, an immediate response to this letter from your bank taking responsibility be sent to us attaching detailed and true identity of the above stated account numbers, an undertaking to refund each and every legitimate person defrauded through the said accounts, evidence of due diligence on every account bearing **Peter Okoye** or **Psquare** and/or **Zoomlifestyle**. Clear projections and readiness to work with the law enforcement agencies already engaged by our client to apprehend the fraudsters.



We demand **N500, 000, 000.00 (Five Hundred Million Naira)** in damages.

CONSEQUENCE:

TAKE NOTICE that we have used our professional abilities to restrain our client, Mr. Peter Okoye from calling out your bank on social media, and other platforms for negligence, connivance, complicity, pending your reactions to this letter. In the circumstances that you neglect, delay or ignore and disregard to heed our demands within seventy two (72) hours of service of this letter on you, we shall be left with no option than to advise our client accordingly, which shall not be limited to presenting this petition to the CBN and other relevant regulatory agencies, and of course an actions in damages.

We expect wise counsel to prevail.

Thank you.

SOMADINA EUGENE OKORIE, ESQ.

Lead Counsel

JOY ELISABETH OLATUNJI

Counsel

LAW PRACTICE

SENOCEAN

