## SUPERIOR COURT OF THE DISTIRCT OF COLUMBIA CIVIL DIVISION

MAXWELL DEDE, 430 Maple Street Danvers, Massachusetts 01923	
Class Representative of Donors to Indigenous People of Biafra (IPOB)	
Plaintiff,	
v.	
BW Global Group, LLC 20 F Street, N.W., 7 <sup>th</sup> Floor Washington, D.C. 20001	
and	
Allan C. White 2501 Farm Road Alexandria, VA 22302	CASE NO
and	
Jeffrey C. Birrell, 1239 Beverly Rd. McLean, VA 22101-2802	
and	
Rita Eze 2602 Somerton Court Bowie, MD 20721-2981,	
Defendants.	

COMPLAINT FOR DISGORGEMENT AND CONSTRUCTIVE TRUST

Plaintiff Maxwell Dede, class representative of all donors to the Indigenous People of Biafra, through his undersigned attorney, brings this Complaint under Rule 23 for disgorgement by Defendants, singly and collectively, of all funds paid to Defendant BW Global Group, LLC (BWGG) since February 24, 2021 (exceeding \$750,000), acting as a foreign agent of Nnamdi Kanu professedly to advocate for the Indigenous People of Biafra (IPOB); and, to create a constructive trust to receive and devote the disgorged funds as intended by IPOB donors to advance Biafran self-determination and the release from detention by the Federal Government of Nigeria of IPOB leader Nnamdi Kanu by peaceful means in accord with international law and custom. Defendants did virtually no work on behalf of IPOB as Nnamdi Kanu's foreign agent. Among other things, Defendants falsely asserted as a fact that they had lodged a criminal complaint against Nigeria with the International Criminal Court. Plaintiffs state as follows:

### SUBJECT MATTER JURISDICTION

 This Court possesses subject matter jurisdiction over the Complaint under D.C. Code 11-921.

### PERSONAL JURISDICTION

This Court possesses personal jurisdiction over Defendants under D.C. Code 13-423 (a)
 (1).

### **PARTIES**

- 3. Plaintiff Maxwell Dede has donated approximately \$5,122.99 to IPOB to promote self-determination for the people of Biafra though peaceful means and the freedom of Nnamdi Kanu from protracted, illegal, indefinite detention by the Federal Government of Nigeria.
- 4. The class represented by named class Plaintiff consists of all IPOB donors.
- 5. The class is so numerous that joinder of all members is impracticable.

- 6. There are common questions of law or fact to the class.
- 7. The claims of the representative class Plaintiff is typical of the claims of the class.
- The representative class Plaintiff will fairly and adequately represent the interests of the class.
- 9. The parties opposing the class have acted on grounds that apply generally to the class, so that final injunctive, disgorgement relief is appropriate respecting the class as a whole.
- 10. Questions of law or fact common to class members predominate over any questions affecting only individual members, and a class action is superior to other available methods for fairly and efficiently adjudicating the controversy.
- 11. On information and belief, Defendant BW Global Group, LLC (BWGG) consists exclusively of two partners, i.e., Defendants Allan White and Jeffrey Birrell. BWGG has no website. On February 24, 2020, BWGG signed a contract ostensibly to promote human rights and democracy and to advocate for IPOB for \$750,000 for one year covering the period of March 1, 2021, thru February 28, 2022. The contract was not renewed.
- 12. Defendant Allan C. White was director of investigations in the Office of Inspector General in the Defense Department from 1986-2005. Defendant White was President of AW Associates from August 2005-Present. He has been a BWGG partner since 2017. Defendant has BS degree from Park University (offering online instruction) and a PhD from Walden University (offering online instruction).
- 13. Defendant Jeffrey C. Birrell omits his education credentials on Linked-In. Defendant Birrell has been a BWGG partner since 2017. Defendant Birrell has no experience

- lobbying Congress or the Executive Branch. Defendant Birrell has been President of Grace Group since 2006, an organization without a website.
- 14. Defendant Rita Eze is a registered nurse who controls the bank account of IPOB, the sole person with signatory authority. On or about 2021, Defendant Eze terminated the rights of a few IPOB members to monitor the activity of the account after questions were raised about Defendant BWGG's defrauding IPOB by receiving huge funds for no work.

  Defendant Eze singed a contract on behalf of IPOB on February 24, 2021, with BWGG for \$750,000 over one year ending February 28, 2022, as alleged in paragraph 7.

  Defendant Eze wrote checks in aggregate for \$750,000 on IPOB's bank account to BWGG pursuant to the contract.

#### STATEMENT

- 15. On February 24, 2021, Defendant Eze signed a contract with Defendant BWGG as authorized representative of IPOB for \$750,000 over one year ending on February 28, 2022, for BWGG's acting as an advocate for IPOB. Exhibit 1.
- 16. On March 3, 2021, BWGG registered with the United States Department of Justice as a foreign agent of Nnamdi Kanu under the Foreign Agents Registration Act (FARA). The registration statement falsely identified Nnamdi Kanu as a government of a foreign country with an address at 7432 East Trimmier Rd., Killeen, Texas 76542. Nnamdi Kanu is a UK citizen and has never resided at that Texas address. Exhibit 2.
- 17. The BWGG registration statement described its activities as advocating "for the establishment of human rights and democracy for the IPOB" and "to advocate on behalf of the IPOB within the US Government (including the U.S. Congress and the U.S. Department of State) and otherwise engage policy makers and opinion leaders."

- 18. In fact, BWGG performed none of the activities promised and described in the registration statement. BWGG did no advocacy for IPOB before Congress, the State Department, policy makers or opinion leaders.
- 19. FARA requires a foreign agent to disclose to the Department of Justice all informational materials both physical or electronic on behalf of the client. 22 U.S.C. 614 (a).
- 20. According to BWGG's FARA filing, it distributed no informational materials on behalf of IPOB.
- 21. FARA requires registrants to submit supplemental statements at 6-month intervals to include, among other things, political activities taken to promote the client's mission.
- 22. BWGG never made a supplemental submission, a tacit concession that it did not, contrary to its registration statement, "advocate on behalf of the IPOB within the US Government (including the U.S. Congress and the U.S. Department of State) and otherwise engage policy makers and opinion leaders." Among other things, on information and belief, BWGG did not meet with a single member of Congress, a single Member of the State Department, a single journalist, or a single scholar at a think tank about Biafra or Nnamdi Kanu.
- 23. Nothing in the public domain indicates BWGG performed any services for IPOB as stipulated in its February 24, 2021, contract with IPOB.
- 24. BWGG lacks any of the skills, talents, experience, or networks required to act as a genuine, as opposed to a phantom, foreign agent on behalf of Biafra, Nnamdi Kanu, or otherwise.
- 25. On September 16, 2021, BWGG issued a press release in Washington, D.C., which was not shared with the Department of Justice as required by FARA. Exhibit 3.

- 26. The press release falsely stated BWGG had submitted a complaint against Nigeria in the International Criminal Court (ICC) for crimes against members of IPOB. Under Article 25 (1) of the Rome Statute, the ICC has jurisdiction only over "natural persons," not nations which may be sued in the International Court of Justice.
- 27. Furthermore, BWGG has never disclosed its professed ICC filing either with necessary redactions or otherwise despite repeated requests from IPOB members made to Defendant Eze and to BWGG directly. BWGG has never disclosed documentary proof that it has ever made an ICC filing. In fact, its press release to the contrary was a lie to defraud the people of Biafra and IPOB.
- 28. On November 3, 2021, BWGG issued a sequel press release falsely stating that it had filed a second criminal submission to the International Criminal Court against Nigeria. Exhibit 4.
- 29. Defendants White and Birrell used BWGG to defraud IPOB members of \$750,000 or more, which justifies piercing the corporate veil and making them personally liable to disgorge all the funds BWGG received from IPOB to prevent unjust enrichment.
- 30. Upon information and belief, Defendant Eze received a kickback from BWGG for turning a blind eye to its defrauding IPOB of an unknown amount.
- 31. The class members of this lawsuit do not seek restitution but ask for the creation of a constructive trust to receive the funds disgorged from Defendants to advocate for Biafran self-determination by peaceful means, including the release of Nnamdi Kanu from his prolonged and flagrantly illegal detention in solitary confinement by the Federal Government of Nigeria. Plaintiffs request appointing Travis Tracy of TD Bank in

Washington, D.C. as the trustee to disburse the disgorged funds for their original intended use.

### COUNT I-Disgorgement-Defendant BWGG

- 32. Class representative Plaintiff Maxwell Dede re-alleges paragraphs 1-31 as if they were set forth herein.
- 33. Defendant BWGG has been unjustly enriched at the expense of the class of IPOB donors in the amount of \$750,000 paid through an IPOB bank account under the pretext of advocating on behalf of IPOB's self-determination objectives when in fact Defendant did virtually nothing to advocate for Biafran self-determination or Nnamdi Kanu's freedom.
- 34. The Plaintiff class does not seek restitution directly to themselves but to a constructive trust to be devoted to the purposes for which their donated funds were given.

### COUNT II-Disgorgement-Defendant Allan White

- 35. Class representative Plaintiff Maxwell Dede re-alleges paragraphs 1-34 as if they were set forth herein.
- 36. Defendant Allan White has been unjustly enriched at the expense of the class for receiving \$750,000 from class members through an IPOB bank account under the pretext of advocating on behalf of IPOB's self-determination objectives when in fact Defendant White did virtually nothing.
- 37. Plaintiffs do not seek restitution of the disgorged funds directly to themselves but to a constructive trust to be devoted to the purposes for which their donated funds were given.

### COUNT III-Disgorgement-Defendant Jeffrey Birrell

38. Class representative Plaintiff Maxwell Dede re-alleges paragraphs 1-37 as if they were set forth herein.

- 39. Defendant Jeffrey Birrell has been unjustly enriched at the expense of the class by receiving \$750,000 from class members through an IPOB bank account under the pretext of advocating on behalf of IPOB's self-determination objectives when in fact Defendant White did virtually nothing to advocate for Biafra or Nnamdi Kanu's freedom.
- 40. Plaintiff class does not seek restitution of the disgorged funds directly to themselves but to a constructive trust to be devoted to the purposes for which their donated funds were given.

### COUNT IV-Disgorgement-Defendant Rita Eze

- 41. Class representative Plaintiff Maxwell Dede re-alleges paragraphs 1-40 as if they were set forth herein.
- 42. Defendant Rita Eze has been unjustly enriched at the expense of the class for receiving kickbacks from Defendant BWGG paid from class members through an IPOB bank account for collaborating with Defendant BWGG to loot the IPOB bank account of \$750,000 under the pretext of advocating on behalf of IPOB's self-determination objectives when in fact Defendant BWGG did virtually nothing on that score.
- 43. Plaintiffs do not seek restitution of the kickbacks from Defendant Eze directly to themselves but to a constructive trust to be devoted to the purposes for which their donated funds were given.

### PRAYER FOR RELIEF

WHEREFORE, Plaintiff demands judgment against Defendants BWGG, Allan White, Jeffrey Birrell, and Rita Eze, jointly and severally, as follows:

- (a) For disgorgement of \$750,000 on all counts to a constructive trust;
- (b) For attorney's fees;

- (c) For costs, interest, and other fees incurred by Plaintiffs in this action;
- (d) For such other relief as this Court deems just and proper.

Respectfully submitted this 9th day of July 2022.

Bruce Fein Law Offices of Bruce Fein 300 New Jersey Avenue, N.W., Suite 900 Washington, D.C. 20001 Phone: 202-465-8728

Email: bruce@feinpoints.com

Counsel for Plaintiffs





February 24, 2021

Indigenous People of Biafra (IPOB) Washington, D.C.

This letter establishes and defines the relationship between the Indigenous People of Biafra, hereinafter ("IPOB") and BW Global Group, LLC., hereinafter ("BWGG").

The IPOB, in the name of its Leader Mazi Nnamdi Kanu, agrees to enter into this consulting services agreement ("Agreement") with BWGG. BWGG shall serve the IPOB as an independent contractor to the IPOB and is hereby retained under the conditions described herein to provide the services described herein. BWGG will provide monthly status reports as deliverables regarding the progress and status of the project.

BWGG shall provide the IPOB with services relating to the promotion of human rights and democracy and shall otherwise act as an advocate for the indigenous people of Biafra. BWGG may also undertake other similar services that might be referred to BWGG from the IPOB from time-to-time by mutual agreement.

BWGG shall provide consulting services to the IPOB for a period of (1) one year, commencing on the March 1, 2021 through February 28, 2022 and becomes effective on the date of this agreement on, which is the date of the Client's signature of this consulting services agreement.

BWGG shall be paid a fee for its professional services \$750,000 for one year covering the period of March 1, 2021 thru February 28, 2022. This fee shall be paid as follows: \$100,000 due at signing of this agreement covering the first two months (March/April 2021) leaving a balance of \$650,000 which will be paid in monthly installments of \$65,000 USD per month commencing on May 1, 2021 and paid successively on the 1st of each month until the total fee of \$750,000 USD has been paid to BWGG by the Client. Payment to BWG shall be by bank wire or bank draft.

All information exchanged between the IPOB and BWGG will be held confidentially, except where such disclosure is required by U.S. law. BWGG is in good standing with the U.S. Department of Justice, Criminal Division, Office of Foreign Agents Registration and will remain so during the period of this agreement with the Client.

Any disputes arising between the IPOB and BWGG that cannot be brought to mutual satisfaction of both parties, shall be settled by binding arbitration and according to the rules of the American Arbitration Association. The venue for this arbitration shall be Washington, D.C.



February 24, 2021 Page 2 of 2

This consulting services agreement shall be governed and construed in accordance with the laws of Virginia, USA, and shall represent the entire agreement between the IPOB and BWGG. No modification of this agreement shall be binding unless mutually agreed in writing. Should any part of this agreement be found invalid, the remaining provisions shall remain in force.

Execution of this consulting agreement is by signature below:

IPOB:

BW Global Group, LLC.

Mazi Nnamdi Kanu

Leader of IPOB

Date: February 24, 2021

Rita Eze

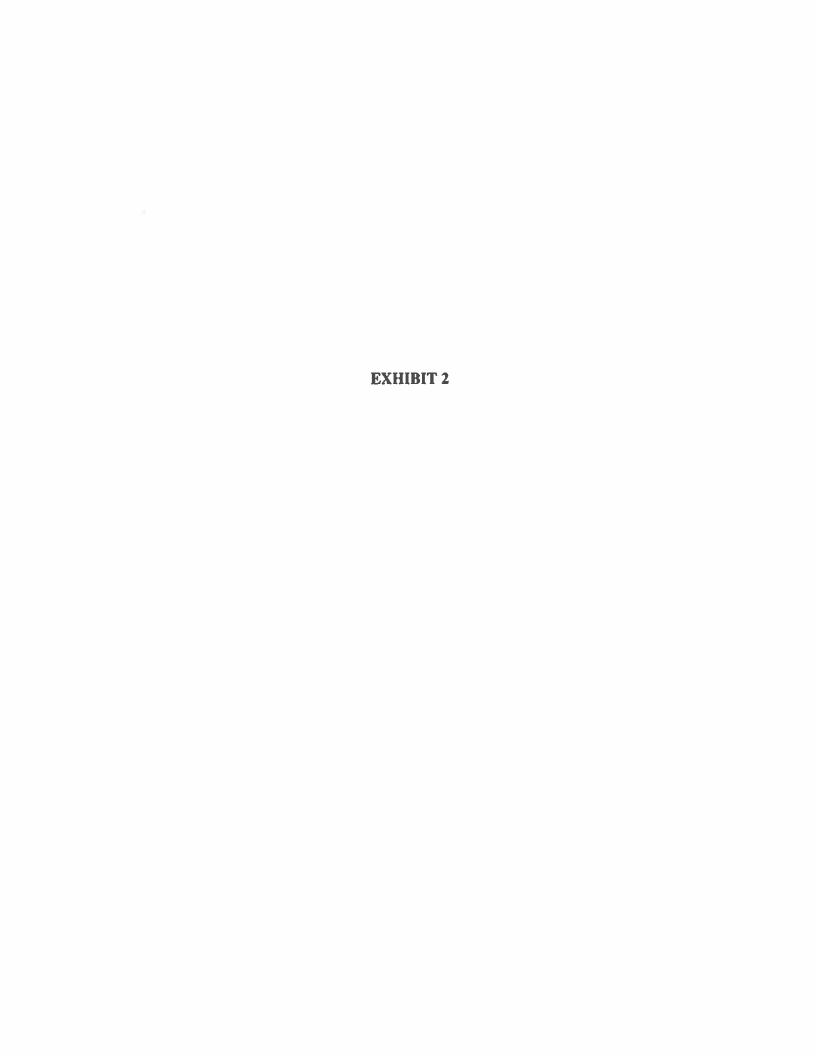
Authorized Representative of IPOB

Date: February 24, 2021

Dr. Alan W. White

Partner

Date: February 24, 2021



OMB No. 1124-0004; Expires July 31, 2023

U.S. Department of Justice Washington, DC 20530

# Exhibit B to Registration Statement Pursuant to the Foreign Agents Registration Act of 1938, as amended

INSTRUCTIONS. A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements, or, where no contract exists, a full statement of all the circumstances by reason of which the registrant is acting as an agent of a foreign principal. Compliance is accomplished by filing an electronic Exhibit B form at https://www.fara.gov.

Privacy Act Statement. The filing of this document is required for the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 et seq, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide the information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the FARA Unit in Washington, DC. Statements are also available online at the FARA Unit's webpage: <a href="https://www.fara.gov">https://www.fara.gov</a>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <a href="https://www.fara.gov">https://www.fara.gov</a>.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .32 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, FARA Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503

Justice	, Washington, DC 20530; and to the Office of information and Re	egulatory Atlans, Office of Management and Budget, Washington, DC 203	
	me of Registrant	2. Registration Number 6935	
	me of Foreign Principal Ider Nnamdi Kanu		
	Check App	propriate Box:	
4. K	The agreement between the registrant and the above-name checked, attach a copy of the contract to this exhibit	ed foreign principal is a formal written contract. If this box is	
5. 🔲	There is no formal written contract between the registrant and the foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach a copy of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.		
6. 🗀	The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below the terms and conditions of the oral agreement or understanding, its duration, the fees and expenses, if any, to be received		
7. WI	hat is the date of the contract or agreement with the foreign	principal? 02/24/2021	
	escribe fully the nature and method of performance of the a		

9.	Describe fully the	activities the registrant enga	ages in or proposes to engag	e in on behalf of the above foreign principal
	The registrant	will advocate for the e	stablishment of human s	rights and democracy for the IPOB.
0	Will the activities	on behalf of the above forei	gn principal include politica	al activities as defined in Section 1(o) of the Act 1.
	Yes 🗷	No □	• • • •	
	1 C3 K	140 []		
	If yes, describe all	such political activities indi	icating, among other things	the relations, interests or policies to be influenced
				onse must include, but not be limited to, activities
	involving lobbying	3, promotion, perception ma	nagement, public relations,	economic development, and preparation and
	dissemination of i	nformational materials.		
	The registrant	expect to advocate on h	behalf of the IPOB with	in the US Government (including the U.S. age policy makers and opinion leaders.
	Congress and t	ne U.S. Department of St	cate; and otherwise eng	age policy makers and opinion leaders.
Ш	Prior to the date of activities, for this		n principal has the registra	nt engaged in any registrable activities, such as political
	Yes 🗌	No 🗷		
	If yes describe in	full detail all such activities	The response should inclu	de, among other things, the relations, interests, and
				purpose. If the registrant arranged, sponsored, or
				padcasts, give details as to dates, places of delivery,
				ut not be limited to, activities involving lobbying.
				nent, and preparation and dissemination of
	informational mat		•	237
				*1 * * * * * * * * * * * * * * * * * *
	Set forth below a	general description of the re	egistrant's activities, includi	ng political activities.
	0.6.31.	.,,	and the state of the	
	Set forth below in	the required detail the regi	strant's political activities	
	Date C	Contact	Method	Purpose
				=

the foreign princ	cipal, or from any oth	prior to the obligation to register <sup>3</sup> for this foreign prior source, for or in the interests of the foreign principle, or for disbursement, or otherwise?	
Yes 🗆	No 🗷		
If yes, set forth	below in the required	detail an account of such monies or things of value	e.
Date Received	From Whom	Purpose	Amount/Thing of Value
13 During the period beginning 60 days prior to the obligation to register <sup>4</sup> for this foreign principal, has the registrant disbursed or expended monies in connection with activity on behalf of the foreign principal or transmitted monies to the foreign principal?			
Yes 🗆	No 🗷		
If yes, set forth	below in the required	d detail and separately an account of such monies, i	including monies transmitted, if any
Date	Recipient	Purpose	Amount

<sup>1 &</sup>quot;Political activity," as defined in Section 1(a) of the Act, means any activity which the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign political party

<sup>2.3.4</sup> Pursuant to Section 2(a) of the Act, an agent must register within ten days of becoming an agent, and before acting as such.

### **EXECUTION**

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 et seq., that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief

Date	Printed Name	Signature	
03/09/2021	Jeffrey C. Birrell	/s/Jeffrey C. Birrell	
03/09/2021	Alan W. White	/s/Alan W. White	

### **EXECUTION**

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 et seq., that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date	Printed Name	Signature	
03/09/2021	Jettrey & Ricrall	SATIC. Build	
<u> </u>			

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Date	Printed Name	Signature	
3-9-2021	ALAN W. WHITE	Oan sot	
		1	



# BW Global Group Petitions International Criminal Court To Investigate Alleged Nigerian Government Atrocities In Biafra

-- USE OF THE NIGERIAN MILITARY AGAINST BIAFRAN CIVILIANS IS GENOCIDE--

NEWS PROVIDED BY

BW Global Group, LLC →

Sep 16, 2021, 06:25 ET

WASHINGTON, Sept. 16, 2021 /PRNewswire/ -- BW Global Group, LLC, (BWGG) a human rights and government accountability advocacy firm in Washington, D.C., today, filed a formal communication with the Office of the Prosecutor ("OTP") of the International Criminal Court ("ICC"). This filing was submitted pursuant to Article 15 of the Rome Statute - of which the Nigerian Government is a signatory. The filing specifically addresses the atrocities committed by governmental forces and/or affiliated paramilitary forces of the Federal Republic of Nigeria against members of the Indigenous People of Biafra ("IPOB") in Southeast Nigeria. "The body of evidence against Nigeria and its systematic and repressive campaign against the IPOB in southern Nigeria has for too long been ignored by the international community. Today, we are petitioning the International Criminal Court to investigate the criminal acts of the Nigerian government - many of which have been well-documented by leading human rights organizations, including Amnesty International, leading news publications worldwide, and policy groups such as the Council on Foreign Relations," asserted Alan White, BWGG partner and Petitioner.

Amnesty International has documented a catalogue of human rights violations that the Nigerian government has taken against the IPOB. These crimes under international law include: mass arrests, excessive and unlawful force, and torture. The BWGG petition to the ICC expands the Nigerian government's crimes to also include international rendition of the regime's political opponents. (Editor's Note: The IPOB Leader, Mazi Nnamdi Kanu - a British

National - was caught, held and tortured in Kenya for 9 days and was unlawfully transported to Nigeria by its Security Agents (DSS) (June 19-29, 2021) in an unlawful rendition operation. Kanu was denied legal counsel for weeks and Kanu has yet to appear in Nigerian court.)

Congressman Chris Smith (R-NJ), Ranking Member of the House Foreign Affairs Africa Subcommittee stated, "...Genocide is happening right before our eyes. The United States and the international community must do to more to mitigate the violence because the dire situation on the ground warrants it and because the people of Nigeria deserve to live in peace and freedom with their fundamental human rights guaranteed." In a related Congressional statement, Mr. Smith continued, "President Buhari has done little to staunch ... crimes against humanity."

Dr. White noted that BWGG will advocate within the ICC for swift action, calling the ICC the judicial body of last resort - noting that the Nigeran government cannot police its own human rights responsibilities, and this paves the way for the ICC to assume responsibility for the well-being of the Biafran people.

BW Global Group is registered with the U.S. Department of Justice as an agent of the IPOB.

Additional information is available to the public.

BWGG 20 F Street, NW Washington, D.C. 20001 202-507-6397

**SOURCE BW Global Group, LLC** 





MEDIA CONTACT: Jeff Birrell 202-507-6397 or BIRRELL@BWGLOBALGROUP.COM

"The Buhari Government is furthering the eventual dissolution of Nigeria." Congressman Chris Smith, Co-Chair, Tom Lantos Human Rights Commission, October 26, 2021

### BWGG LAUNCHES A SECOND ROUND OF CRIMINAL COMPLAINTS AGAINST NIGERIA FOR GENCOIDE IN BIAFRA

-U.S. Congressional Hearing Supports Claims of Nigerian State-Sponsored Repression of the IPOB-FOR IMMEDIATE RELEASE: NOVEMBER 3, 2021. WASHINGTON, D.C.: BW Global Group, LLC, (BWGG) a human rights and government accountability advocacy firm in Washington, D.C., filed a second formal communication with the Office of the Prosecutor ("OTP") of the International Criminal Court ("ICC"). This filing was submitted pursuant to Article 15 of the Rome Statute – of which the Nigerian Government is a signatory. This second criminal filing follows BWGG's September 15, 2021, submission to the ICC and further documents the atrocities committed by Nigerian governmental forces and/or affiliated paramilitary against members of the Indigenous People of Biafra ("IPOB") in Southeast Nigeria.

Supporting its petition to the ICC, BWGG additionally entered a <u>second</u> official criminal complaint against the Nigerian government with the United National Office of the High Commissioner for Human Rights. BWGG expanded its cooperation with the United Nations to include the U.N. Human Rights Council (UNHRC). The UNHRC is an intergovernmental body within the U.N. and it is made up of 47 States responsible for the promotion and protection of all human rights around the globe. It is based at the U.N. Office in Geneva.

BWGG 20 F Street, NW Washington, D.C. 20001 202-507-6397

BWGG has fully communicated with the Foreign Office in the United Kingdom regarding both the ICC and U.N. filings and continues to seek increased cooperation from the UK regarding the unlawful rendition of IPOB Leader, Mazi Nnamdi Kanu, a British citizen. (Editor's note: Nnamdi Kanu was abducted, held and tortured in Kenya for 9 days and was unlawfully transported to Nigeria by Nigerian Government Security Agents (DSS) (June 19-29, 2021) in an unlawful rendition operation. Kanu was denied legal counsel for weeks and Kanu is largely incommunicado.)

Jeff Birrell, a BWGG partner noted, "With these filings, BWGG has amassed a body of evidence against Nigeria and its systematic and repressive campaign against the IPOB in southern Nigeria. The international community is now engaged and responsive to our petition.

Congressman Chris Smith (R-NJ), Ranking Member of the House Foreign Affairs Africa Subcommittee stated in an October 26, 2021, Congressional Hearing, "We see Nigeria's selective use of counterterrorism laws to attack political opposition." Smith noted, "Nigerian State forces which are obligated to protect civilians are at best indifferent or at worst allegedly complicit in the ongoing and sustained attacks."

Congressman Smith, a forty-year Member of Congress and stalwart advocate for human rights, concluded his remarks by stating emphatically, "... the (Nigerian) Government has no qualms about labelling groups agitating for separatism, such as the Indigenous People of Biafra, 'Terrorists,' and using this label as justification for repression."

"BWGG's efforts to protect the People of Biafra is just beginning and will not stop. In October, BWGG briefed a visiting delegation of Nigerian federal legislators on its efforts with the ICC, U.N. and U.S. Congress. BWGG is now preparing a comprehensive package to bring the full force of sanctions against those with 'Command Responsibility' in the Nigerian Government for human rights abuses against the IPOB in Biafra and other groups in Nigeria."

BWGG will also focus on Fulani extremism and violence against Muslims and Christians alike,t" Birrell concluded.

###

BW Global Group is registered with the U.S. Department of Justice as an agent of the IPOB. Additional information is available to the public



# Bruce Fein

BWGG july 2 com sup ct.pdf

07/09/22 11:28 AM