

TYPE: RESEARCH ARTICLE/REVIEW ARTICLE

Recognizing Incidences of Unprovoked Attacks Against Police Officers in Nigeria Between 2017-2020: Charting New Pathways of Human Rights Intervention on Right to Life

Hilary Nwaechefu ¹, Uche Nnawulezi ²✉

¹ Faculty of Law Redeemer's University Ede, Osun State, Nigeria.

² Faculty of Law, Alex Ekwueme Federal University, Ndufu Alike Ebonyi State, Nigeria.

✉Corresponding Email: nnawulezi.uche@funai.edu.ng

Citation

Nwaechefu, A. Nnawulezi, U. (2022). Recognizing Incidences of Unprovoked Attacks Against Police Officers in Nigeria Between 2017-2020: Charting New Pathways of Human Rights Intervention on Right to Life. *IJCLS (Indonesian Journal of Criminal Law Studies)*, 7(2), 175-198

History of Article

Submitted: 30 June 2022

Revised: 25 August 2022

Accepted: 15 November 2022

About Author(s)

Please describe all authors biographies, including the current activities and working, expertise, publication, grant and award, and any important information for readers.

IJCLS (Indonesian Journal of Criminal Law Studies) published by the Faculty of Law, Universitas Negeri Semarang,

ABSTRACT

The unprovoked attacks on Police Officers in Nigeria between 2017-2020 that resulted to several deaths of the Police Officers have put a question mark on the constitutional provisions guaranteeing the rights of all citizen's lives and that of the Police Officers. This paper seeks to identify why the unlawful killings of Police Officers had persisted notwithstanding constitutional provisions. Interestingly, despite these developments, the position of international human rights law(IHRL) and Section 33 Chapter IV of the Constitution of the Federal Republic of Nigeria, 1999(as amended) has raised two key questions, first, the standards of protection by government. Second, the permissible circumstances in which persons deserves protection. This paper revealed that inadequate equipment, training and rascal attitudes of police officers towards crime prevention led to unlawful attacks on them which resulted to their deaths during the period under review. Recommendations are made towards stemming the tide. The paper adopted a doctrinal approach that

Indonesia. Published biannually every
May and November.

focused principally on current legislations and policies on human rights protection, and concluded with the view that the national and international policy makers have a moral, ethical and legal obligations to protect the lives of police officers as they are entitled to such protection based on their human rights and by so doing it will help to compliment the provisions of the Universal Declaration of Human Rights, 1948 as well as Section 33 Chapter IV of the Constitution of the Federal Republic of Nigeria, 1999.

KEYWORDS

Unprovoked Attacks, Police Officers, Human Rights, Right to Life, Nigeria.

Copyright © The Author(s). See our **Copyright Notice**



This work is licensed under a [Creative Commons Attribution-ShareAlike 4.0 International License](https://creativecommons.org/licenses/by-sa/4.0/). All writings published in this journal are personal views of the authors and do not represent the views of this journal and the author's affiliated institutions.

1 INTRODUCTION

The incidences of unprovoked attacks on members of the Nigerian Police Force between 2017 and 2020 has recently risen in prominence that one may be tempted to question the existence of the several human rights instruments in Nigeria during the period under review. Indeed, the Nigeria Police Force¹ is saddled with the responsibility of protection of lives and properties in Nigeria. While the Police Act and Regulations² define the modus operandi of the force, the Constitution of the Federal Republic of Nigeria is the umbrella *grund norm* or basic law upon which other laws derived their validity and guarantees the right to lives of all citizens, the members of Nigeria Police Force inclusive. However, despite these legislations, many officers and men and the rank and file have been victims of both lawful and unlawful homicides. This ugly incident and the recurring event of killing officers and Constables led the Federal Government of Nigeria to create more welfare packages for the Policemen in any case of grievous casualties and even deaths.

In light of the above, many well-meaning Nigerians have welcomed these revised packages to boost the morale and operational efficiency of this vital law enforcement apparatus of the State. It is disheartening that unlawful killing of Police Officers have persisted in Nigeria despite the several human rights instruments

¹ See Section 214(1) of the Constitution of the Federal Republic of Nigeria, 1999(as amended).

² See The Nigerian Police Act Cap P19 Laws of the Federation of Nigeria, 2004.

enshrined in the key international, regional and national human rights.³ This unlawful homicide accounts to while Police officers in Nigeria appear to dread an encounter with students during the latter's protest on campuses, and also dread criminals like armed robbers in any encounter. Sometimes perpetrators of unlawful homicide are arrested and prosecuted. Numerous instances abound where the offences are committed, and the law enforcement agents arrested nobody; and in some instances, the perpetrators get the arms through corrupt security agents in Nigeria. It should be noted that as the severity and alarming trends in the unlawfully killings of Policemen continued unabated, these have attracted the attention and criticisms of different stakeholders such as Judges, Lawyers, Academics and Social critics on a possible solution to this ungodly act. Notwithstanding the persistence of concerns and criticisms of different stakeholders, the crimes of unlawful killing of Policemen have persisted. Many writers in the past and present have dwelt on this subject matter. When issues of unlawful homicide meted on Policemen are brought before the Courts, the Courts have never failed in making pronouncements and convicting the accused persons where the cases are proved beyond reasonable doubt by the prosecution. However, there have been legal and policy responses of late to address the menace of killing police officers unlawfully. Be that as it may, scholarly efforts and judicial contributions on the subject matter of unlawful killing of Policemen by criminals tagged "Unknown Gunmen" have not yielded any positive results. Also, several methodological approaches adopted by academics and other stakeholders have not made any impact towards stemming the tide, and it is ongoing. In addition, in order to appropriately respond to the central question in this paper, several supporting sub-questions will be examined as well.

This paper will commence by providing an overview of the incidences of unprovoked attacks on the Nigerian Policemen by bandits popularly known as "Unknown Gunmen" in order to demonstrate the level of human rights abuses that led to the deaths of several Policemen. Subsequently, an analysis on the conditions that justifies a lawful killing of Policemen will be presented within the extant laws, and the reasons why Policemen are incessantly killed. In addition, the paper will provide an overview and evaluation of Federal and State Government Action Plans towards boosting the operational of the Nigerian Police Force, including an

³ Universal Declaration of Human Rights, 1948, Article 10, International Covenant on Civil and Political Rights, 1966, Article 14, Convention on the Rights of the Child 1989, Article 40 (2) (b), European Convention on Human Rights, Article 6., African Charter on Human and Peoples Rights, 1979, Article 7., African Charter on Human and Peoples Rights 1979, Article 8 and Chapter IV of CFRN, 1999(as amended), Section 33.

assessment of the legislative frameworks related to right to life under human rights instruments. The paper will finalize with a recommendation and conclusion.

2 Method

This study employs a qualitative research method used a normative juridical research. The normative juridical approach is an approach that is based on the main legal material by examining theories, concepts, legal principles and laws and regulations related to this research. Legal materials in this study were obtained from secondary data with primary legal materials and secondary legal materials. Primary legal materials are legal norms in the form of statutory regulations, international legal norms, customary law norms, Islamic legal norms. In this study, the legal materials used are various laws and regulations that regulate criminological theory. Secondary legal material is legal material whose contents provide an explanation of the primary material.

3 RESULT AND DISCUSSION

A. Terminology: The Police

The Black's Law Dictionary⁴ defines Police, as 'the governmental department charged with the preservation of public order, the promotion of public safety, and the prevention and detection of crimes. Secondly, as " the officers and members of this department.' However, the Police Act⁵ did not define the word 'Police,' but under Part 1 of the Act, it says a 'police officer' means any member of the force.⁶ Drawing from the above definition of Police, it goes without saying that the first contact of an offender with the Criminal Justice System is usually the police, who investigates a suspected wrongdoing and make arrest. Thus, the said definition reflects the human rights approach taken by the Nigerian government, which is not only the Country that enshrined this constitutional provisions in it's National Laws. Thus, Section 214(1) of the Constitution of the Federal Republic of Nigeria, 1999 establishes the Nigerian Police Force as follows:

There shall be a Police Force for Nigeria, which shall be known as the Nigerian Police Force, and subject to the provisions of this

⁴ B.A. Garner, *Black's Law Dictionary*, USA Thomson Reuters, 2004.

⁵ See Police Act Cap P19, Laws of the Federation of Nigeria, 2004.

⁶ Nigeria Police Act Cap P19 LFN. 2020.

section no other police force shall be established for the Federal or any part thereof.

To this end, Nigeria practices a National Police Force System. And in furtherance, of that the Constitution further provides⁷:

That the Nigerian Police Force shall be organized and administered in accordance with such provisions as may be presented by an Act of the National Assembly.

Consequently, by virtue of the above, Section 4 of the Police Act⁸ outlines the functions of the police to include: prevention and detection of crime, apprehension of offenders, preservation of law and order, protection of life and property, enforcement of all laws and regulations with which they are charged. In the same vein, the Nigerian Police is also accorded wide powers by law. This is exemplified under the Criminal Code Act⁹, Penal Code¹⁰, Criminal Procedure Code¹¹ and Criminal Procedure Act¹² where the police have powers, to take measures to prevent crime, to arrest, investigates crime, interrogate and prosecute suspects., to grant bail to suspects pending investigation or arraignment in Court., to search properties and persons in order to prevent crimes, detect or investigate crimes, detect and apprehend offenders, and collect evidence for prosecution. It must be emphasized that, in discharging the above mentioned functions, there are prospects that the rights of the citizens or the police may be violated due to structural, political and economic conditions, police institutional culture and practices, and personality factors as the case may be.

By virtue of the foregoing therefore, it is rightly put that the legislations against unlawful homicide in Nigeria, just like other laws, had its root from the Nigerian Constitution.¹³ The Constitution is the basic law or the *ground* norm. To this effect, Section 31 states explicitly that:

Every person has a right to life, and no one shall be deprived intentionally of his life, save in execution of the sentence of a court in respect of a criminal offence of which he has been found guilty in Nigeria.¹⁴

These citizens whose lives are protected by the Constitution also include police

⁷ See Section 214(2)(a), CFRN, 1999.

⁸ See Vol. 13, Cap P19, LFN 2004.

⁹ See Criminal Code Act, Cap C38 LFN 2004.

¹⁰ See Penal Code, Cap P3 LFN 2004.

¹¹ See Criminal Procedure Code

¹² See Criminal Procedure Act, Cap C41 LFN, 2004

¹³ Constitution of the Federal Republic of Nigeria 1999(as amended)

¹⁴ Constitution of the Federal Republic of Nigeria 1999 Section 37.

officers, whether on active duty or not. The Constitution, however, provided for lawful claw backs, that is, the legal situation for which a person's life may be terminated, and in such situation, it cannot be said that such a person has been deprived of his right to life. Such exceptional situations which are recognised by the constitution of Nigeria include the execution of a lawful sentence of a court of law in Nigeria in respect of a criminal offence, for instance, a person convicted on a murder charge and thus sentenced to death by a court of competent jurisdiction. Secondly, lawful homicide may occur during the use of reasonable force in self-defence or defence of another person from unlawful violence or for the defence of one's property. Lawful homicide may occur in the process of carrying out a lawful arrest or to prevent the escape of a person lawfully detained or to suppress a riot or a mutiny¹⁵.

3.1 International Statutes Protecting The Life of Human Persons

It is instructive we draw attention to Article 3 of the Universal Declaration of Human Rights as it appears to be the first treaty that explicitly recognizes human rights of persons and provides human person with a number of rights¹⁶. Thus, Article 3¹⁷ provides "*that everyone has a right to life, liberty and security of person.*" These statutes, apart from guaranteeing the citizens lives, these citizens also include police officers whether on active duty or not. Pursuant to international standards, police officers also have the right to life, even while enforcing law and order in the society and shall not be deprived of this right in an unlawful or arbitrary way¹⁸. One then wonders why the members of the public and the society whom they are meant to protect their lives turn around to kill the policemen in cold blood, especially while the policemen are on active service. This is the crux of this article or what this article is out to unravel and supply solutions. Essentially, aside the presence of the international statutes which are domesticated in the Nigerian Constitution, it should be noted that the practical problems of enforcement of all these human rights treaties are basically done by the Nigerian Police Force through the provisions of the Nigerian Police Act which provides the statutory duties of the Nigeria Police Force. For example, the duties of the Nigeria Police Force as spelt out in the Police Act such as in Section 4¹⁹ : The Police shall be employed for the prevention and detection crime

¹⁵.Constitution of the Federal Republic of Nigeria 1999 Section 33 (2)(a-c).

¹⁶Universal Declaration of Human Rights, 1948, Article 3.

¹⁷.Universal Declaration of Human Rights,(adopted 10 December, 1948).

¹⁸International Covenant on Civil and Political Rights, 1966, Article 9(1).

¹⁹.Nigeria Police Act Cap P19 LFN, 2020.

in accordance with constitutional and statutory provisions, and also Section ²⁰ provides that the Nigerian Police Force is responsible for promoting and ensuring that the fundamental rights of persons in police custody as guaranteed by the relevant provisions of Chapter IV of the Constitution are adequately secured.

On the other hand, the above provisions of the Act presupposes that it is a living policeman that has to carry out these lofty and onerous tasks. From a morally- dependent viewpoint, the question has always be, if the Police personnel are frequently killed while carrying out their lawful duties or during active service, then who is safe in the society? If the protector of lives and properties becomes a victim of violent killing, the effect is that people may become scared of enlisting into the Police Force for fear of being killed as those who are already serving in the Force are already terrified, scared and intimidated while carrying out their duties, a situation which if unchecked may lead to anarchy or lawless situation in Nigeria.

3.2 Analysis on The Conditions Where A Policeman May Be Lawfully Killed in Nigeria

If a Police officer unlawfully kills a person, citizen or non-citizen, upon his conviction for unlawful homicide by a Court of competent jurisdiction, he will be sentenced to death by hanging. This law applies not only to the personnel of the police force, but also to civilian citizens. Several instances abound where the High Courts in Nigeria had convicted and sentenced police officers to death for reasons of unlawfully causing the death of civilians or deliberate unlawful killing of persons. A reference point in mind where policemen were lawfully sentenced to death in Nigeria and would be killed by hanging was the case in Akwa Ibom State²¹ where Justice Ifiok Ukana sitting at the State High Court Uyo, Nigeria convicted and sentenced four Policemen to death by hanging for unlawfully killing a commercial motorcyclist, one Mr Felix Akpan who hailed from Ubiakpan in Ibiono Ibom Local Government Area of Akwa-Ibom State. The four convicted Policemen were Inspector Moses Akpaete, Inspector Idoko Samson, Corporal Enobong Udo, and Corporal Godwin Nnanna. The convicts were at the time of committing the offence attached to Area C Division of Akwa

²⁰ Ibid.

²¹ Four Policemen to Die by Hanging for Unlawful Killings, (30 July,2018),*New Telegraph*, p.8.

Ibom State. The Judge concluded that the offence was that of conspiracy and common intention in the murder of late Felix Akpan²². In a similar vein, there was another case where five Policemen are to die for murder.²³ In this case, on Friday the 22nd day of September 2017, a High Court of Rivers State, Nigeria sitting in Port- Harcourt convicted five members of the Special Anti-Robbery Squad (SARS), an outfit of the Rivers State Police Command, Nigeria, for murder. The five-man police team led by one Assistant Superintendent of Police (ASP) Samuel Chigbu was found guilty of extra-judicial killings of two young men, namely: Mr Michael Akora and Mr Michael Igwe in Oyigbo Local Government Area of Rivers State, Nigeria by Justice Adolphus Enebeli of the State High Court. The victims of the unlawful police killings were Mr Michael Akora, a 28years old young man and his friend, Mr Michael Igwe. They were apprehended by the police team on 22 June 2009 while going about their duties and were killed the next day in a bush at Oyigbo Local Government Area. In the course of the proceedings, Justice Adolphus Enebeli, in his judgement in the Fundamental Human Rights suit brought before him, declared that Chigbu and his men undoubtedly and intentionally murdered their victims. The Court in the circumstance, awarded Fifty Million Naira to the families of the deceased as compensation.

The trial judge held that the Special Anti-Robbery Squad (SARS) operatives violated Sections of the Nigerian Constitution on extra-judicial execution as they killed the two men without carrying out any form of investigation on the allegations against their victims. Justice Enebeli further held that after careful consideration of all the evidence before him, "it was crystal clear that the five SARS personnel did not discharge their duties with all sense of responsibility". He disproved the claim by the police team that strayed bullets hit the victims during crossfire between the police and unknown gunmen believed to be gang members of the duo, adding that such allegation could not be substantiated. Justice Enebeli further noted that: "it was not coincidental that the victims were shot on the same part of their body, and was rushed to the Braithwaite Memorial Hospital (BMSH) where they died at the same time and were buried at the same place and time". The trial Judge also lashed out at the SARS in the State, saying that the outfit has acquired the tag of extra-judicial killings and has destroyed the image of the Rivers State Police

²² Four Policemen to Die by Hanging for Unlawful Killings, (30 July, 2018),*New Telegraph*, p.8.

²³ Five Policemen to Die for Murder, (23 September,2017), *Vanguard Newspaper*, p1.

Command²⁴. One may ask, what was the motive or purpose of the accused persons resort to extra-judicial killings of innocent civilians they are meant to protect? Deductively, it can only reasonably be deciphered that for whatever reasons, they lacked the power to take one's life indiscriminately.

3.3 Reasons Why Police Men Are Incessantly Killed Unlawfully in Nigeria

It is important at this juncture to highlight some of the notable reasons why policemen are incessantly killed unlawfully in Nigeria. Thus, in view of the above practical challenges, some of the reasons are as follows:

i. Armed Robbers in Dire Need of Arms.

This appears to be the most common reason for the unlawful killings of police officers by bandits popularly known as "Unknown Gunmen". The criminals need arms to carry out their nefarious acts, and they cannot afford these expensive weapons, especially at their early stage of robbery operation when they have not made enough money to buy these sophisticated arms and ammunitions. The criminals, in their bold and desperation resort to killing any Policemen within their reach and cart away their guns. This was the case in Owerri, Imo State, Nigeria along the Control Post arena, the Imo State Capital, where one Sergeant Christian Nnamani who was reportedly spotted by the bandits sleeping on duty, they opened fire on him and shot him dead and cart away his AK 47 rifle. Sergeant Christian Nnamani, until his demise was attached to the Mobile 18 Owerri, Imo State Nigeria. The Police Public Relation Officer, Mr Andrew Enwerem, confirmed the murder incident²⁵. Also, in another encounter, gunmen reportedly attacked a police station in Kogi state and killed two police officers on duty, went into the cell and shot dead a suspect detained therein. The criminals had a field day as they carted away several weapons including AK47 rifles. The Kogi State Police Public Relation Officer William Aya confirmed the deadly incident.²⁶ This is a clear indication that the Nigeria police force is not well equipped and is also not combat-ready. The Police Force does not anticipate emergency or unforeseen challenges; hence the cunning bandits quickly kill the policemen right in their barracks and cart away their rifles bought with taxpayers' money and then use the same rifles to attack the citizen

²⁴ Five Policemen to Die for Murder, (23 September, 2017), Vanguard Newspaper, p1.

²⁵ Armed Robbers kill Police Officers in Owerri, (13 September, 2018), Daily Sun Newspaper, p.7

²⁶ Gunmen attacked a police station in Kogi State. (4 April, 2018), Nigerian Tribune Newspaper, p.33

since the policemen themselves are too lazy to know what to do at a given point in time.

In another report from Niger State, the gunmen in need of more arms and ammunitions stormed the Divisional Police Station at Kutigi in Lavun Local Government Area of the State at about 3.50 am on Thursday the 20th day of April 2018, shot sporadically and ultimately killed a police sergeant, Jubril Abubakar and took away his rifle. The State Police Command Public Relation Officer; ASP Mohammadu Abubakar confirmed the attack. This prompted the Commissioner of Police in Niger state to make a public announcement that whoever gave useful information leading to the arrest of the gunmen would be rewarded with the sum of five hundred thousand naira.²⁷ These few instances cited lend credence to the fact that killing police on active duties is a vital source of arms acquisition by the men of the underworld in Nigeria. The police force needs to be very watchful because the rate at which the police personnel were killed in the year 2018 calls for concern on all stakeholders of security matters. Every citizen of Nigeria is a stakeholder because as the country's security personnel were being killed frequently in 2018, everybody is at risk. Security, therefore, is everybody's business.

ii. Criminals Lay Arm Bush and so Quickly Kill the Policemen

The criminals in Nigeria sometimes come by way of arm bush and attack police officers unawares; hence, the criminals killed such police officers with ease. In the process of killing the policemen in such sorrowful manner, they cart away their arms and use such arms and ammunitions in robbery operations. The application of arm bush technique led to the brutal murder of four policemen who were alighting from their Hilux van at the road intersection between Okeora and Avbiosi in Owan Local Government Area of Edo state in Nigeria. The assailants carted away the weapons of the murdered policemen and went further to set the patrol van ablaze. The Edo state police command Public Relation Officer Chidi Nwanbuzor confirmed the sad incident. The chairman of Owan West Local Government Area Mr Frank Ilaboya also confirmed the murder of the four policemen during the attack.²⁸

²⁷ Gunmen Attacked a Police Station in Niger State (20 April, 2018), *Nigerian Tribune Newspaper*, p.30

²⁸ Armed Robbers kill four policemen in arm bush in Edo State, (16 July, 2018), *Daily Independent Newspaper*, p.5.

iii. Police Officers Are Unlawfully Killed to Facilitate Bank Robbery Operations

Armed robbers who specialised in a robbery in commercial banks knew that before embarking on their nefarious operations that there are few policemen on guard the banks. Their first target is usually to eliminate the policemen on security duties. In many instances, the robbers succeed in killing the policemen and take away millions of Naira and foreign currencies in domiciliary accounts of bank customers. It is usually a tale of bloodbath and sorrow whenever a bank robbery attack occurs in Nigeria. Some reference case of killing police officers during robbery operations includes:

- a. Robbers killed a Policeman in Ekiti Bank attack on Thursday the 20th day of April 2018, at Ado in Ifaki community Ido/Osi Local Government Area of Ekiti state. They attacked the bank and killed the mobile policeman on duty and injured another. The state commissioner of police confirmed the attacked²⁹.
- b. Robbers killed a Policeman in Edo bank attack on Friday the 20th day of April 2018, at Akoko-Edo Local Government Area of Edo State. They attacked two banks and killed a policeman on duty and killed four other persons and gained access to the bank vault³⁰.
- c. Robbers killed six Police officers in Offa bank attack on Thursday the 5th day of April 2018, at Offa in Offa Local Government Area of Kwara State. The Robbers attacked two banks and killed a policeman on duty and killed twenty-one, other persons. The Kwara State Commissioner for Police Mr Lawan Ado on his account of the killings put the number of police officers that lost their lives in the bank robbery attack at nine.³¹
- d. In February 2017, an incident of bank robbery occurred at Wetherall road Owerri, Imo state capital at a Zenith bank branch. The dare devil Robbers focused their attention on the policemen at the security gate and killed them and carted away the money belonging to a bank customer which the customer had gone that morning to deposit. The Robbers trailed the customers to the bank, and at the gate of the bank, they opened fire and killed the policemen on security duties at the bank during an exchange of gunfire, while the other members of the gang took away the money from the trailed customer.³²

²⁹Robbers killed a Policeman in Ekiti Bank Attack(20 April,2018),*Tribune Newspaper*, p.30.

³⁰Robbers killed a Policeman in Edo Bank Attack (2018 August 10),*Tribune Newspaper*, p.3.

³¹Robbers killed Six Police Officers in Offa Bank Attack (7 April, 2018), *Punch Newspaper*, p.32.

³²Police Nab Fleeing Suspect of a Zenith Bank Robbery in Owerri, Imo State. Available at: <http://punchng.com>> accessed 10 March, 2021.

Although a policeman also shot dead one of the robbers, the death a policeman was a national loss to Nigeria as a whole.

iv. Criminals Disguised in Police or Military Uniform and Thereby Kill Police Officers with Ease.

Another strategy sometimes adopted by armed robbers is to disguise as policemen by wearing the uniform of police officers, thereby misleading the actual policemen to believe that they (bandits in police uniform) are policemen serving in the state. This was the reason why a Divisional Police officer (DPO), Mr Kingsley Chukwueggu in charge of Rumuolumeni Police Station in River state Nigeria, was killed on his way to Port Harcourt in Rivers state. The DPO was reported to have travelled to his home town, *Mbaise* in Imo state to visit his aged mother and while on his way back to Port Harcourt, he ran into some men whom he sincerely believed were policemen, as they were wearing the real police uniforms. The late DPO noticed that the purported policemen were harassing several persons unduly, prompting Mr Kingsley Chukwueggu to stop his car, came out and challenged the purported policemen. The fake policemen rather than hid the cautions from the DPO, resorted to attacking him and subsequently killed him by shooting him on the head³³. The death of Mr Kingsley Chukwueggu in such hazy circumstance ought to serve as an eye-opener to a member of the police force. In these days of manipulations and falsehood, police officers must be very vigilant in their relationship with fellow police officers, civilian alike. Police officers should not assume on the surface of it that every person on police uniforms is genuine. A dependable and skilful police officer must watch demeanour of anybody that parades himself as police personnel. There should also be a professional sign or symbol by which a fake police officer could be identified even before coming closer to such purported police officers. Perhaps had Mr Kingsley Chukwueggu taken a little caution and observe the demeanour of those bandits on police uniforms, he could have discovered that they were criminals in the disguise of police officers.

v. Most Police Officers in Nigeria Do Not Wear Bullet Proofs

It is very disheartening that police authority in Nigeria sends troops on the counter-terrorist attack against the dreaded *Boko Haram* insurgents. *Boko Haram*

³³A Divisional Police Officer (DPO), Mr. Kingsley Chukwueggu killed by Robbers on his way to Portharcourt. Available at: < <http://www.punchng.com> > accessed 10 March 2021.

terrorists had military training and are combatants who can only be matched by well-trained military men. The Nigeria military has not been able to defeat the insurgents; several soldiers have lost their lives to the *Boko Haram* insurgents. It beats the imagination of any well-meaning Nigerian why members of the police force would be deployed on counterterrorism mission against the highly sophisticated terrorist sect like the *Boko Haram*. To use the police to combat the terrorist is just another way of sending them on a suicide mission. No wonder the insurgents were reported to have killed four police officers and six soldiers in recent attacks in Dalla Balge Local Government Area of Borno state where they were deployed to restore peace, order and stability in the area. The Commissioner of Police Damian Chukwu confirm the killings³⁴

vi. Inadequate Training of the Policemen, Low Morales and Lack of Courage Makes Police Officers Vulnerable to Unlawful Killings.

There is no mincing of tongue saying that the Nigeria police force are not adequately trained and as a result, professionalism is weak in the force; no wonder the policemen in Nigeria easily fall victim to bandits and gunmen in any exchange of fire or crossfire. A professionally well-trained police officer will be courageous and combat-ready at any time. When bandits realise that the policemen are courageous and well equipped in arms and ammunitions with other gadgets fitted on them during operations, they are likely to flee on sighting members of the force. A lazy, poorly equipped and low morale police force will not be able to confront armed robbers. In many cases, the Nigeria policemen take to their heels on sighting well-armed bandits. In most cases in Nigeria the criminals are courageous and operate on the ideology of doing or die; hence even if the policemen kill one bandit, the criminals would have killed four or more police officers in an offensive encounter. To buttress this assertion, we refer to the recent killing of sixteen (16) police officers by bandits in a fierce encounter in Zamfara State, Nigeria. The Police Public Relation Officer of Zamfara State Police Command, Muhammad Shehu, a Superintendent of Police (SP)³⁵ had finally opened up after a period of silence that the police force lost sixteen (16) men who were murdered and twenty (20) personnel rescued after the police gun duel with bandits in Birnin Magaji Local Government Area of Zamfara State. The fallen

³⁴. Boko Haram killed Four Police Officers and Six Soldiers in Recent Attacks in Dalla Balge Local Government Area of Borno State (9 March, 2018), *Nigeria Tribune Newspaper*, p.2.

³⁵. 16 Police Officers killed by Bandits in a Fierce Encounter in Zamfara State, 6 December, 2018 *Daily Trust Newspaper*, pp.1 and 5.

policemen were part of the Special Intervention Force set up by the immediate past Inspector-General of Police Ibrahim Idris. It took reinforcement from the Special Forces Personnel, Police Mobile Force, Counter Terrorism Unit and Federal Special Anti-Robbery Squad (SARS) personnel with three surveillance helicopters who later arrived at the battle arena and rescued twenty (20) before the bandit could kill them³⁶. After the recovery of the bodies of the slain policemen, all the inspector General of Police (IGP) could do about the murdered police personnel was to announce that they would be given befitting burials, and he sent condolence to the families of the fallen policemen and also added that insurance benefits and other entitlements would be paid to their next of kins.³⁷ These large scale onslaught and deaths as much as sixteen (16) against the police force could be minimised if the police force had strengthened its logistics. Weak personnel base exposes the police to avoidable deaths. Rather than just giving befitting burials and awarding benefits to families, reasonable funds could be used to strengthen logistics of the force and minimise casualties in the force.

vii. Inadequate Police Officers in Nigeria

No other reason could be adduced for the few numbers of police officers deployed on the Nigeria roads, streets and high ways. Regrettably in several branches of Nigerian banks, one will see just two police officers on guard, and that accounts why police officers are easily killed when the armed robbers come in large numbers. The policemen get intimidated on sighting several bandits numbering over twenty carrying weapons more sophisticated than what they two policemen are carrying. When police officers are fewer in number at a particular location, an attack on them will not be resisted with adequate force expected of a well-equipped police force, and this accounts for while gunmen kill police officers and they encounter no opposition in their bid. The route to escape is free for the armed robbers who had already killed the two policemen on duty. This inadequate number of police officers was the reason adduced by a police sergeant for the frequent successful killing of police officers by bandits

³⁶. Federal Special Anti-Robbery Squad (SARS) personnel with three Surveillance Helicopters Rescued Twenty Police Officers Before the Bandit could kill them in Zamfara State. (6 December, 2018), *Daily Trust Newspaper*, pp.1 and 5.

³⁷. Federal Special Anti-Robbery Squad (SARS) Personnel with Three Surveillance Helicopters rescued twenty police officers before the bandit could kill them in Zamfara state. (6 December, 2018). *Daily Trust Newspaper*, pp.1 and 5.

and they get away with their rifles uninterrupted.³⁸The bandits also know that there are fewer policemen on the high ways and streets in Nigeria. They kill police officers and there would be no reprisal or resistance to their escape. In July 2018, unknown shooters shot dead seven (7) police officers who were at a location called Galadimawa Roundabout, along the Nnamdi Azikiwe Road, Lokogoma District, Federal Capital Territory, Abuja the Nigeria capital. A police sergeant expressed displeasure and disappointment that despite the murder of seven police officers, only a few policemen were drafted there the next day. The sergeant also explained that there were non-functional street lights within the area; hence, escape was easy for the criminals after murdering the seven policemen who were on their lawful duty post during the incident.³⁹

viii. Police Officers are sometimes just murdered by hoodlums on flimsy grounds.

Police officers have become enemies to members of the Nigeria public to the extent that some disgruntled elements in the society easily murder them. The reasons why the policemen are murdered on cold blood includes the high handedness of the policemen themselves, their brutal attitude towards the citizens, especially the uninformed and illiterate folks in the society. In other instances, the policemen mix too freely with the civil populace and in the process become victims of civil unrest of hoodlums and criminals. How can it be explained why a police officer would leave his duty post to attend a birthday party organised by a wayward lady, whereby he became a victim of direct bullet attack by criminals. This was the story of late an Assistant Superintendent of Police (ASP) Abiodu Akinde, an administration officer attached to Ijanikin police station

in Lagos state Nigeria, who was killed by hoodlum using a locally made pistol at a birthday party organised by the police officer's lover. The Police Public Relation Officer of Lagos state, CSP Chike Oti confirmed the killing of the ASP Akinde at the birthday party of his lover, Dupe Ogunbiyi, 34, of 27 Jimoh street, Iyana-Era Ijanikin Lagos, by a leader of rival lovers of the celebrant⁴⁰. Even though Dupe Ogunbiyi and seven other suspects had been arrested for further

³⁸ In July 2018, Unknown Shooters shot Dead Seven (7) Police Officers who were at a Location called Galadimawa Roundabout, along the Nnamdi Azikiwe Road, Lokogoma District, Federal Capital Territory, Abuja the Nigeria capital. (4 July, 2018), *Punch Newspaper*, p.7.

³⁹ In July 2018, Unknown Shooters Shot Dead Seven (7) Police Officers who were at a Location called Galadimawa Roundabout, along the Nnamdi Azikiwe Road, Lokogoma District, Federal Capital Territory, Abuja the Nigeria Capital (4 July, 2018), *Punch Newspaper*, p.7.

⁴⁰ An Assistant Superintendent of Police (ASP) Abiodu Akinde, an Administration Officer attached to Ijanikin Police Station in Lagos State (7 December, 2018) *Punch Newspaper*, p.5.

interrogation and subsequent prosecution, the truth remains that the dead officer cannot be brought back to life no matter the number of suspects arrested and later convicted. Police officers must control their excesses and live a life of dignity to avoid being victims of attacks by criminals. Professionalism must be the watchword of policemen as they carry out their lawful duties in the perilous Nigeria Society.

ix. Several Police Officers Died During an Exchange of Gun Battle with Bandits

It is at times unfortunate that policemen in the process of exhibiting gallantry in confronting bandits, they lost their lives through bullets of the bandits. This was the unfortunate incident of a police sergeant Moses Jacob with force number F/NO444849 who was killed during an exchange of gun battle with kidnappers who earlier kidnapped one Dr Achugbu Pascal. Dr Achugbu Pascal was kidnapped on his back from work along Nawgu- Enugu-Agidi-Amawbia road Anambra state Nigeria. Police Public Relation Officer in Anambra state Haruna Mohammed confirmed the incident.⁴¹

x. Some Policemen in Nigeria Society are not Normal Themselves.

Some policemen in Nigeria are not healthy. Some have mental disorder not noticeable at the early stage until it gets out of hand. This mental disorder often leads to the death of police officers if not checked and managed timorously. This was the situation in the case of one police Seargent, Moses Ishaya who went berserk in Jos south local government area of Plateau State in Nigeria, shot three persons to death and killed himself to death, for a reason not known to anyone, after his irrational action.⁴²

xi. Several Police Officers are killed During Civil Protests

Nigeria is a resilient society. Protest of several types often erupts by different organisations protesting one form of injustice or the other. Students protest against an increase in tuition fees; organised labour protest against non-implementation of the agreement reached with the previous government; labour stage peaceful demonstrations seeking an increase in salary and other welfare packages and sometimes this agitation that started peaceful may degenerate to violence, often as a result of police using force to disperse the crowd. For

⁴¹.A Police Sergeant Moses Jacob with Force Number F/NO444849 was killed During an Exchange of Gun Battle with kidnappers. (7 July, 2019), Punch Newspaper, p.30.

⁴². F. Y. Ojomo, *Policing in a Corrosive Environment*(Ibadan, Kollak Publishers 2011),83.

instance, it was recently reported that a senior police officer of the rank of Deputy Commissioner of Police (DCP) and other persons were killed during a protest by members of an Islamic sect in Nigeria known as *Shiites*. The protest took place in Abuja the Nigeria capital over the continued detention of the leader of the sect, Alhaji Ibrahim El-Zakzaky and his wife. The protest resulted in a bloody clash between the *Shiite* group and the Nigeria police force, leading to eleven (11) members of the *Shiite* group being killed while the Islamic sect killed a Deputy Commissioner of Police in the person of Umar Usman. The sect members struck the police officer with a sharp object into his chest, and the officer slumped. He was rushed to the hospital for medical resuscitation, but he did not survive the injury. The officer died.⁴³

xii. Police Officers are in Some Instances Victim of Circumstantial Killing.

There are instances where police personnel are killed in what can amount to circumstantial killing. Such circumstantial killings are rather unfortunate, but it seldom happens in the Nigerian corrosive environment. When such unlawful and unfortunate killings occur, it is difficult to hold the perpetrators of the killings liable. It would not be wrong to say police personnel have become the endangered species and they meet their untimely death while on active duty. On Wednesday the 7th day of August 2019, three serving policemen lost their lives through the negligence of some military personnel in Taraba state Nigeria. The names of the slain police officers were Sergeant Dahiru Musa, Sergeant Usman Danzumi and Inspector Mark Ediale.⁴⁴ The military troop of 93 Battalion Takum in Taraba state shot and killed three policemen whom the soldiers erroneously claimed were kidnappers. The Nigeria Police Public Relation Officer, Frank Mba a Deputy Commissioner of Police (DCP) narrated that the soldiers attacked the police operatives led by Felix Adolije a Superintendent of Police (SP) of the Intelligence Response Team along *Ibi Jalingo* road in Taraba state resulting in the killing of one Inspector of Police, two Sergeants and one civilian. Mba further stated that the team of policemen who were attacked by the soldiers was on a mission, taking a suspected kidnapper, one Alhaji Hamisu to the Police command headquarters in Jalingo in Taraba State. Regrettably, the Army authorities had admitted that the soldiers who killed the three policemen acted

⁴³.Islamic Sect killed a Deputy Commissioner of Police, Umar Usman(23 July, 2019),Guardian *Newspaper*, pp.1 & 6.

⁴⁴.Military Troops of 93 Battalion Takum in Taraba State, Nigeria Shot and killed Three Policemen. Available at: <[https:// www.premiumtimesng.com](https://www.premiumtimesng.com)> accessed 10 March, 2021.

in error, believing that the police team whom they attacked was kidnappers and the soldiers further set free the real suspected kidnapper, one Alhaji Hamisu.⁴⁵

xiii. Police Officers are in Some Instances Victim of Circumstantial Airstrikes.

Many policemen are killed in some careless circumstances which could have been avoided. Nigeria has acquired the status of a volatile state with ethnic militia and insurgents taking their tolls on the citizens. In Nigeria, *Fulani* herdsmen and the *Boko Haram*, all in the northern part of the country have been unleashing mayhem on security forces. Sad as it were, it was reported in the dailies that twenty (20) security personnel were killed among whom were eight (8) policemen. The security personnel were called on distress mission to two communities of Shiroro and Munya in the Niger state of Nigeria, as a result of herdsmen attack on people of the areas. The herdsmen attacked the communities and raped women, necessitating the distress call on the security forces. The report was that the air troop of the security forces mistakenly bombed and killed the land troop comprising of twelve soldiers and eight policemen; what a tragic deaths?⁴⁶

xiv. Some Policemen Have Been Killed in Civil Protests Against Police Brutality in Nigeria.

The Special Anti Robbery squad (SARS) of the Nigeria Police force has become notorious for brutality and extra judicial killings. The brutality had taken an alarming dimension in Nigeria, prompting irate youths all over the state capital in Nigeria to stage peaceful protest calling for the disbandment of the Special Anti Robbery squad (SARS). The protest which started on Monday 12th October 2020 led to the killing a police Inspector, Erin Ayodeji who until his death was attached to Surulere Anti kidnapping unit of the police.⁴⁷

3.4 Evaluation Of Federal And State Government Action Plans Towards Boosting The Operational Efficiency Of The Nigerian Police Force

The Federal Government of Nigeria realising, though late, that the operational morale of men and women in the police force had gone to the lowest ebb, had recently through the Police Service Commission, approved an enhanced salary and

⁴⁵.Army Authorities Had Admitted that the Soldiers who killed the Three Policemen acted in Error. Available at: <https://www.vanguardngr.com> accessed 10 March, 2021.

⁴⁶.Air Troops of the Security Forces Mistakenly Bombed and Killed the Land Troops Comprising of Twelve Soldiers and Eight Policemen (2 March, 2020), *Daily Independent Newspaper*, p.4.

⁴⁷ Monday, (12 October, 2020) *Daily Post Newspaper*, p.1.

allowance structure for the officers and men of the police force intending to boost their morale⁴⁸, remove cowardice and lazy attitude, which often lead to the easy killing of the policemen in active service. Unmotivated police officers could fall easy prey to bandit because he would not be combat-ready. Laissez-faire attitude to duty would make a policeman be easily killed by the criminals he is supposed to defeat in a gun duel. In as much as an enhanced salary and allowance structure for the police force is a welcome development, one would have also expected to read that the federal government had procured the latest sophisticated weapons and equipment used in the advanced world of Europe and America to combat crimes, protect lives and properties. The Federal Government of Nigeria should have gone a little further in recommending sending police officers to the technologically advanced countries to learn how to combat crimes with minimal loss of lives of police personnel contrary to what is happening in Nigeria at the moment.

B. Recommendations

Consequently, it is anticipated that successful adoption of these recommendations in Nigeria and internationally will ultimately contribute to expand protection of the lives of the Policemen in Nigeria :

i. Police officers attached to the courtroom and premises should be armed and also wear bulletproof apparatus.

The authors of this article are practising lawyers, who have observed with dismay that in court premises, two out of three police officers attached to the courts are not armed. Only one of them is armed; this being the case, it could be reasonably argued that in the event of an attack by armed robbers or gunmen as they are often referred to in Nigeria, only one armed policeman cannot withstand ten armed bandits. The truth is that the bandits are likely to kill the policemen including those not armed. The only armed policeman will be overwhelmed by the ten-armed bandits, who may even carry more sophisticated weapons including the use of dynamite. Pathetically is the fact that the policemen attached to the courtroom as orderlies are not usually armed. How can unarmed policeman maintain security without being killed in the event of an attack? It is therefore recommended that more police officers be drafted to the court premises including the courtrooms. The police officers must also carry the most sophisticated light weapons to safeguard their own life and that of the citizens they are supposed to protect.

⁴⁸Federal Government of Nigeria Approved an Enhanced Salary for the Police Force. (27 November, 2018) *Guardian Newspaper*, p.7.

ii. The Federal government should import the kind of weapons used by policemen in Europe and the United States of America

In Europe and America, armed robbers do not find it easy to kill police officers and get away with it as it frequently happens in Nigeria corrosive environment. This is because the police force in these jurisdictions goes about their duties with sophisticated weapons and state of the art communication gadgets. It does not mean that there no criminals in those jurisdictions, but the rate at which criminals can kill police officers and get away with it is minimal. Imagine how bandits killed sixteen (16) policemen in one spot and escaped since July 2018 as reported above in this article and they have not been apprehended and brought to book.

iii. The Federal government should send the policemen to the United Kingdom and the United States of America for high power technology training on policing.

It is further recommended that the Nigeria policemen, officers and the Ranks and file be sent to the United Kingdom and the United States of America for high power technology training on policing. Nigeria policing system is weak, and this explains why the bandits find it easy to kill police officers even without provocation from the police and they escape unchallenged like the incidence of killing seven (7) police officers in Abuja on 4th day of July 2018 reported earlier in this article. Proper emphasis should be placed on professionalism so that Policemen do not fear and tremble at an encounter with the Armed robbers. Military men do not tremble in any encounter with the armed robbers, and these explain why the Armed robbers do not take chances when they see the military men. The Robbers take to their heels because they know that the military does not tremble at the sight of bandits. Similarly, the police authorities should give some military training to the policemen that would also make them fearless in any encounter with the men of the underworld. It is only professionalism that can instil this lacking boldness among the police force.

iv. All policemen posted to be anywhere in Nigeria should be well-armed and wear bulletproof vests.

There is no doubt that bulletproof gadgets would go a long way to protect the officers and men of the police force from stray bullets and other forms of attacks. These days there are reported cases of bandits wearing bulletproof dresses while our policemen hardly can get these bulletproof dresses. Bulletproof dresses do not guarantee one hundred per cent safety, but at least it would go a long way in minimising the incidence of frequent bullet killing of police officers by bandits. Now

is the time for action and the federal government of Nigeria must wake up and save our policemen from wanton killings by gangsters. It is so unfortunate that Policemen on road traffic in Nigeria do not carry arms. This practice is dangerous to the lives of these traffic officers. Regardless of what duty is assigned to a policeman, the armed robbers and other criminally minded persons see the policeman as an enemy. This is the more reason why you have to equip the policeman with safety gadgets and sophisticated weapons better than what an average bandit could possess. At all times, the policeman on duty must wear a bullet-proof gadget because his career makes him vulnerable to attacks and sudden death. It sounds ridiculous that police officers in Lagos state, who are detailed to provide security during the levying of execution of court judgments in Lagos state, do not carry arms while carrying out such sensitive task. In carrying out such duties, what then becomes the fate of the policemen if, for instance, the tenant being evicted becomes violent and attacks the policeman and the sheriffs of the honourable court? Annoying also is the fact that only one unarmed policeman is assigned to accompany the sheriffs. For instance, in the execution of the judgment of a magistrate court in Lagos in the case of Toyin Ayoola, Victoria Ayoola, Ebere Anazodo,⁴⁹ the wife of the Defendant judgment debtor broke into a tirade and held the policemen on his uniform and insisted that the execution of the judgment of the honourable court will not be carried out. The unarmed policeman was helpless in the face of apparent hostility from the judgment debtor's wife. We submit that that the policeman ought to be armed, fitted with bulletproof apparatus and the police personnel should be at least three in number to checkmate any resistance or violence during the execution of judgments of courts.

v. There should be enhanced salaries and welfare packages for the members of the police force.

We must not fail to commend the federal government of Nigeria, who recently approved an enhanced salary and welfare packages for the police force. If such salary and welfare packages are eventually implemented, it will go a long way to remove lackadaisical attitude to duties on the part of the police officers. This lackadaisical attitude to work often exposes them to attacks unguardedly which results in their deaths. The police sergeant reported killed on active service, earlier in this article, in Owerri Imo state was shot dead while he was sleeping on duty. It is hopeful that when the government implements the enhanced salary for the police force,

⁴⁹Suit No: MCA/ 981/2018 (Unreported Judgment of the Apapa Magistrate Court Sitting at Mba in Ajeromi Ifelodun Local Government Area of Lagos state Nigeria).

lackadaisical attitude to work will be a thing of the past and the policemen will be committed to their safety.

vi. The number of men and women in the police force is grossly inadequate.

The recent announcement and publication in the Punch newspaper of 1st day of December 2018 of the intention of the Federal Government of Nigeria to recruit Ten Thousand (10, 000) Constables into the Force are still like a pin dropped into the Ocean. Nigeria has an estimated population of about Two- Hundred Million. We recommend a minimum of two million policemen to provide the needed security with adequate training, equipment and motivation. Finally, these recommendations could serve as strong examples for other nations within the region of Africa, ensuring that their criminal Justice systems are in line with human rights standards.

4 CONCLUSION

The idea of recognizing incidences of unprovoked attacks against police officers in Nigeria between 2017-2020 as highlighted in this paper will contribute to the growing concerns on human rights abuses in Nigeria. During this period under review, it is essential to realize that the presence of bandits popularly known as "Unknown Gunmen" was conspicuous than ever. While the human rights system has inherently been flawed and subjugatory in character, the possibility and benefits of reform through the recommendations of this paper should not be disregarded. Furthermore, it can be concluded that if the Federal Government of Nigeria strategically implements the entire recommendations above, the incidences of frequent killings of police officers as numerously seen in 2018 alone will reduce significantly, even if it may not be eradicated. All hands must be on deck. People must appreciate that police officers are responsible citizens, and their lives must not be terminated in the course of their official duties to society. There is no doubt that the jobs of security agents globally speaking, Nigeria inclusive, is hazardous. But with the recommendations adduced in this paper, the terrifying incidences of persons unlawfully killing police officers in the Nigeria corrosive and unsafe environment will be reduced significantly contrary to the situation in Nigeria at the moment

5 ACKNOWLEDGMENTS

None

6 DECLARATION OF CONFLICTING INTERESTS

None

7 FUNDING

None

8 REFERENCES

Garner, B.A *Black's Law Dictionary, 2004* (Thomson Reuters United States of America 2004).

Ojomo, F.Y. *Policing in a Corrosive Environment* (Ibadan, Kollak Publishers 2011), 83.

Nigeria Police Act Cap P19 LFN. 2020

Constitution of the Federal Republic of Nigeria Section 37

Constitution of the Federal Republic of Nigeria 1999, Section 33 (2)(a-c)

Universal Declaration of Human Rights(adopted 10 December 1948).

Nigeria Police Act Cap P19 LFN, 2020.

Nigeria Police Act Cap P19 LFN, 2020.

New Telegraph, 30 July 2018, p.8

Vanguard Newspaper, 23 September, 2017, p.1

Daily Sun Newspaper, 13 September 2018, p.7

Nigeria Tribune Newspaper, 4 April 2018, p.33

Nigeria Tribune Newspaper, 20 April 2018, p.30.

Daily Independent Newspaper, 16 July 2018, p.5.

Tribune Newspaper, 20 April 2018, p.30.

Tribune Newspaper, 10 August, 2018 p.3.

Nigerian Punch Newspaper, 7 April 2018,p.32. Available at:<

<http://www.punchng.com>>

Nigerian Tribune Newspaper, 9 March 2018, p.2.

DailyTrust Newspaper, 6 December 2018, pp.1 and 5.

Nigerian Punch Newspaper, 4 July 2018, p.7.

Nigerian Punch Newspaper, 7 December 2018, p.5.

Nigerian Punch Newspaper, 7 July 2019, p.30.

Nigerian Guardian Newspaper, 23 July 2019,pp.1 & 6.

32. Military Troop of 93 BatallionTakum in Taraba State , Nigeria Shot and killed Three Policemen. Available at: <[https:// www.premiumtimesng.com](https://www.premiumtimesng.com)>

33. Army Authorities Had Admitted that the Soldiers who killed the three Policemen Acted in Error. Available at: < <https://www.vanguardngr.com>>

Daily Independent Newspaper, 2 March 2020, p.4.

Nigerian Guardian Newspaper, 27 November 2018 p.7.

Suit No: MCA/ 981/2018 (unreported Judgment of the Apapa Magistrate Court Sitting at Mba in AjeromiIfelodun Local Government Area of Lagos State, Nigeria