



Critical Appraisal of the Criminal Jurisprudence of Excessive Massacres and Massive Abductions in Nigeria

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ABSTRACT

This work surveyed the security circumstances in Nigeria with the intention of analysing the criminal consequences of the activities. In contemporary Nigeria, insecurity has permeated the six geo-political zones of the country. The work is geared towards jurisprudential appraisal of excessive massacres and abductions in Nigeria. The methodology were doctrinal and meta-analytical styles. Utilizing primary and secondary sources of information as tools for data collection. The work found, the acts of massacres and abductions are done without recourse to any authority. It is concluded, by all known criminal theories and models, the perpetrated activities are offences known in criminal jurisprudence. The work recommended among others, the process of weaponry be applied to whittle the goons and marauders operational foundation.

Keywords: Appraisal; Criminal; Jurisprudence; Excessive; Massacres; and Abductions.

OCCURRENCE OF MASSACRES AND KIDNAPPINGS IN NIGERIA

The territory of Nigeria has been plagued with the acts of kidnapping, abduction, murder, rape, and arson. These acts against natural course of nature are inadequately checked by government. The above mentioned criminal activities are ongoing in all the six geo-political zones of the country. Seldomly, will a day go by, without incident of either kidnapping, abduction, pyromania, or outright murder in the six geo-political zones. Most fundamental of all, is that, those who are perpetrating these criminalities are all Nigerians, who are living in Nigeria. Nigerians know their identities, places of abode, caches and hideouts. The goons have structurally divided the country amongst themselves. There is a dominant gang in every geo-political zone of Nigeria. Each group pouring criminal activities on the people of Nigeria. The following are some activities going on in the six geo-political zone of the country:

Northeast Geo-political Zone

Northeastern Nigeria is the niche of Boko Haram tactical base. This terror group operating in the northeast has rendered most communities in Adamawa, Borno and Yobe States inhabitable. The northeast cadastral zone, is like a theatre of war, infested with violence, mass killing, and other acts of criminalities. The group is constantly killing and maiming people, both civilian and military personnel. Other criminal activities in the zone are kidnappings, abductions, rapes, suicide bombing, and setting houses ablaze. In January 20, 2012, boko haram attacked Kano city with lethal bombs and grenades. The aftermath of the attack was the murdering of One Hundred and Eighty-Five (185)¹ persons. On July 6, 2013 boko haram's armed men attacked Government Secondary School *Mamudo* in Yobe State of Nigeria and killed Forty-Two (42)² persons. By September 29, 2013, this group launched an attack at the Boy's Hostel at Government College of Agriculture at *Gujba* in Yobe State and killed Forty-Four (44)³ people including members of staff. By February, 2014, One Hundred (100)⁴ children were kidnapped and killed. Most of the children were Christians from the villages of *Doron Baga* and *Izeghe* in Yobe.⁵ The same month of February, 2014 Fifty-Nine (59) students were murdered

¹ AP's Africa Coverage ; <https://www.apsnews.com/hub/africa>. Accessed on November 8, 2025; at about 15:00 hours GMT.

² The Guardian Reuters, February 26, 2014; <https://www.theguardiannaws.com>. Accessed at 14:25 GMT on November 10, 2025.

³ <https://www.theglobeandmail.com/news>. September 29, 2014

⁴ *Ibidem*.

⁵ *Ibidem*.



at the Federal Government College *Gujba*.⁶ From 2009 to 2025, Boko Haram group has killed an estimated number of persons not fewer than Thirty-Five Thousand (35,000)⁷ in Borno State. The direct activities of insurrection have rendered over Two Million (2,000.000)⁸ people in the northeast desolate.

By 14 and 15 of April, 2014, boko haram abducted entire Model Girls Science Secondary School and teaching staff at Chibok in Borno State. The abducted girls' population was over Two Hundred and Seventy-Six, (276) students.⁹ They were flawlessly led to a desired destination at Sambisa Forest, where they have been hibernated till date. In 2017 alone, more than One Hundred and Twenty-Seven (127)¹⁰ suicide bombs have erupted in Nigeria recording the killings of Tens of hundreds.¹¹ In *Gwoza* town,¹² the headquarters of *Gwoza* Local Government Area of Borno State, Thirty-Two (32)¹³ people were killed by a female suicide bomber in September 2024. In the night of June 21, 2025, a female suicide bomber detonated her lethal explosive in a crowded fish market at *Konduga* town. A short distance from Maiduguri, the episode murdered Twelve (12)¹⁴ persons instantly. On Christmas day, the 25th of December 2025, another female suicide bomber targeted a mosque at *Gamboru* market, in Maiduguri metropolis, and massacred Five (5)¹⁵ persons and injured over Thirty-Five (35)¹⁶ people. Between the periods of 2014 and 2015, an estimated 2,000 women and girls have been abducted and raped by boko haram.¹⁷ Between the periods of 2014 and 2015, an estimated 2,000 women and girls have been abducted and raped by boko haram terrorist group.¹⁸ This gang attacked a boarding school and out-rightly murdered Forty-Two (42)¹⁹ students, and abducted Thirty (30).²⁰ boko haram group abducted another 88 School Girls from Borno State of Nigeria.²¹ Recently, on February 3, 2026, the militia group at Maiduguri city, Borno State killed Seventeen (17)²² persons. They also injured and kidnapped scores of people to an unknown destination.²³

Quite recently, on October 11, 2025, boko haram sect launched a drone attack on an Army Troop in Borno State and killed Four (4)²⁴ soldiers. Still very recently, on November 18, 2025, Two (2) soldiers and Two (2)²⁵ civilians Joint Task Force (JTF) were murdered by an ambushed boko haram in *Wajiroko* in Azir Multe district of *Damboa*²⁶ Local Government Area of Borno State. Still in the State of Borno, on November 24, 2025, in the town of *Askira-Uba*, boko haram launched a lethal attack on farmers and kidnapped Thirteen (13),²⁷ and their farm implements to an unknown destination.

⁶ The Guardian Reuters, February 26, 2014; <https://www.theguardiannews.com>. Accessed at 14:25 GMT on November 10, 2025.

⁷ AP's Africa Coverage ; <https://www.apsnews.com/hub/africa>. Accessed on November 8, 2025; at about 15:00 hours GMT.

⁸ *Ibidem*.

⁹ BBC News Africa, <https://www.bbc.com> of May 8, 2017. Accessed on November 3, 2025 at about 15:00 hours GMT local time.

¹⁰ Daily Justice News of January 3rd 2012. <https://www.dailyjusticeneeds.com>. Accessed on December 12, 2025 at about 15:00 hours GMT local time.

¹¹ AP's Africa Coverage ; <https://www.apsnews.com/hub/africa>. Accessed on November 8, 2025; at about 15:00 hours GMT.

¹² *Ibidem*.

¹³ *Ibidem*.

¹⁴ *Ibidem*.

¹⁵ <https://thenigerislawyer.com/2025/12/25>, Accessed on December 25, 2025 at about 11:51 hours GMT local time.

¹⁶ *Ibidem*.

¹⁷ Amnesty International, Nigeria. <https://www.amnesty.org>, 08-05-2017; accessed at about 18:00 hours GMT on 27.10.2025.

¹⁸ *Ibidem*.

¹⁹ Daily Telegraphs, 09.07.2013.

²⁰ *Ibidem*.

²¹ The Guardians Associated Press, of 19.04.2014.

²² Amnesty International, Nigeria, February 3, 2026; <https://www.amnestyinternational.org>. Accessed at about 18:00 hours GMT on 03.11.2025.

²³ *Ibidem*.

²⁴ <https://barristerng.pol.com>. October 11, 2025. Accessed on October 12, 2025 at about 21:15 hours GMT local time..

²⁵ <https://thenigerislawyer.com/2025/11/19>, Accessed on November 18, 2025 at about 9:30 hours GMT.

²⁶ *Ibidem*.

²⁷ <https://nigerlalawyer.com>, 2025/11/24. Accessed on November 24, 2025 at about 18:25 hours GMT.



Northwest Geo-political Zone

The northwestern zone has been experiencing manifest violence including kidnapping, abduction, murder, arson, and rape. In this part of the country, between 2009 and 2025 at least, not fewer than Nineteen Thousand, One Hundred (19,100)²⁸ Churches have been attacked and destroyed by infernos.²⁹ By the period spanning from 2009 and 2025, an estimated number of Fifty Thousand to One Hundred Thousand (50,000 to 100,000)³⁰ persons have been exterminated.³¹ Recently, on October 5th 2026, a couple identified as Mr and Mrs Ahmed Abubakar Zakka with a neonate were kidnapped³² at *Alrahus* Estate in Millenium City. The incident took place in *Chikun* Local Government Area of Kaduna State. the kidnappers are demanding a ransom of Three Hundred Million (₦ 300,000,000.00)³³ for their release. In 2025 alone, an estimate of Seven Thousand (7,000)³⁴ Christians have been massacred in the northwest. By September 26, 2021, Three Hundred (300)³⁵ School's Girls were abducted in Zamfara State of Nigeria. On February 26, 2021, Two Hundred and Seventy-Six (276)³⁶ female students were abducted from the Government Girls Science Secondary School at *Zangebe*³⁷ in Zamfara State. The Girls were between the ages of Ten and Seventeen (10-17) years.³⁸ Very recently, on the 3rd day of February, 2026, Twenty-One (21)³⁹ persons were killed in Dorma, village in Katsina State, northwestern Nigeria.

Contemporarily, on 14th March 2026, at *Afiko* community in southern province of Kaduna, Kaduna State, Seventy-Eight (78)⁴⁰ people were captured by Bandits. The captors are demanding an astronomical ransom of One Billion (₦ 1. 000,000,000.00)⁴¹ Naira. By February 26, 2021, Three Hundred (300)⁴² girls were abducted in Zamfara State. On September 29, 2023, Fourteen (14)⁴³ students from Federal University, Gusau, Zamfara State were kidnapped by Bandits. By March 24, 2021, One Hundred and Thirty-Seven (137) people were abducted,⁴⁴ from Kuriga town in Kaduna State of Nigeria. On September 26, 2023, Fourteen (14)⁴⁵ students from *Bungudu* District of Zamfara State of Nigeria were kidnapped by armed Bandits.⁴⁶ On December 11, 2020, Bandit abducted kidnapped Hundreds (300)⁴⁷ Boys from Government Science Secondary School at *Kankara*,⁴⁸ in Katsina State. In *Afaka*, in the *Igabi* Local Government Area of Kaduna State, on March 11, 2021, Forty-Five (45)⁴⁹ students were abducted. The statistical analysis were Twenty-Nine (29) females and Sixteen (16) males. The kidnapping episode took place in Federal Government Mechanized College of

²⁸ <https://www.thenigerialawyer.com>. Accessed on November 1, 2025 at about 9:00 GMT local time.

²⁹ *Ibidem*

³⁰ <https://www.thenigerialawyer.com>. Accessed on November 1, 2025 at about 9:00 GMT local time.

³¹ Centre for Democracy & Development, An Abuja Based Policy and Advocacy Think Tank.

³² Crime Intelligence News.

³³ *Ibidem*.

³⁴ <https://www.thenigerialawyer.com>. Accessed on November 1, 2025 at about 9:00 GMT local time.

³⁵ BBC News Africa, September 26, 2021. <https://www.bbcnewsafrica.com>. Accessed on November 6, 2025 at about 16:00 hours GMT.

³⁶ Al Jazeera News, February 26, 2021. <https://www.ljazeenaws.com>. Accessed at about 14:00 hours GMT on November 8, 2025.

³⁷ *Ibidem*.

³⁸ *Ibidem*.

³⁹ Amnesty International, Nigeria. <https://www.amnesty.org>, 04-02-2026; accessed at about 15:00 hours GMT on 04.02.2026.

⁴⁰ Izonogey News of March 15th 2026. Accessed on 16th March 2026 at about 16:00 hours GMT local time.

⁴¹ *Ibidem*.

⁴² BBC News, February 26, 2021. <https://www.bbc.com>. Accessed on November 10, 2025 at about 12: noon hours GMT.

⁴³ *Ibidem*.

⁴⁴ Al Jazeera News, March 24, 2024. <https://www.ljazeenaws.com>. Accessed at about 14:00 hours GMT on November 8, 2025. Also reported on You Tube, Television (TV) on February 24, 2024.

⁴⁵ Al Jazeera News, September 26, 2023. <https://www.ljazeenaws.com>. Accessed at about 16:00 hours GMT on November 12, 2025. Also reported by UNICEF, September 26, 2023. <https://www.unicef.org>.

⁴⁶ *Ibidem*.

⁴⁷ Al Jazeera News, December 11, 2020. <https://www.ljazeenaws.com>. Accessed at about 10:00 hours GMT on November 5, 2025.

⁴⁸ *Ibidem*.

⁴⁹ Premium Times, Nigeria, March 11, 2021. <https://www.premiumtimesng.com> Accessed on November 11, 2025 at about 18:00 hours GMT.



Forestry,⁵⁰ Kaduna State of Nigeria. In Zamfara north, on July 28, 2025, Thirty-Five (35)⁵¹ people were abducted by Bandits and Herdsmen to an unknown shrubland.

In Banga village in *Kaura Namada* Local Government Area of Zamfara State, Fifty-Five (55)⁵² persons were kidnapped in a broad day light. By June 22, 2025, Thirty (30)⁵³ people were killed in Kebbi city by armed Bandits and Herdsmen. On October 20, 2025, masked gunmen killed Two (2)⁵⁴ police men in Kaduna State.⁵⁵ By June 22, 2025, armed Bandits attacked Kebbi City and killed Thirty (30)⁵⁶ persons instantly. Recently, Bandits and Herdsmen, on November 18, 2025, abducted Twenty-Five (25)⁵⁷ Girls and Eleven (11)⁵⁸ female teaching staff from Government Girls Comprehensive Secondary School, Maga, in Kebbi State. On November 20, 2025, Twenty (20)⁵⁹ soldiers who went for the rescue mission of Kebbi kidnapped Girls were ambushed and killed by armed Bandits. Still in Kebbi State of Nigeria, by November 22, 2025, armed Bandits and Herdsmen kidnapped Two Hundred and Fifteen (215)⁶⁰ students and Twelve (12) teaching staff from Kebbi Senior Secondary School.

Northcentral Geo-political Zone

The northcentral zone of Nigeria, particularly Benue and Plateau States have been experiencing ongoing severe violence, embracing mass kidnapping, abduction, murder and incessant infernos. The sequences of coordinated attacks are executed with sophisticated lethal weapons. This cadastral zone appears to be the second in the scheme of calculated series of pogrom after the northeast. By the periods, between 2022 and September 2025, at least an estimated number of Twelve Thousand (12, 000)⁶¹ people have been killed in Benue and Plateau States.⁶² Hundreds of thousands of people have been displaced from their nativity making them to dwell in IDPs camps on the mercies of humanitarian organizations. In 2023, in Jos South Local Government Area of Plateau State, bandits launched a violence attack and murdered Five Hundred and One (501)⁶³ persons. Within October 2023 and the middle of 2025 at least an approximated number of Seventeen Thousand (17,000)⁶⁴ Christians have been killed in Benue and Plateau States. An estimate of One Hundred and Two (102)⁶⁵ churches have been attacked and destroyed by fire in Benue States.

Most recently, on February 3, 2026, armed militia group, invaded Woro and *Luku* communities in Kaiama Local Government Area of Kwara State.⁶⁶ The armed invasion by extremist terrorists' group claimed the lives of One Hundred and Seventy-Seven (177) persons. Also, in the same attack, Thirty-Eight (38) people were

⁵⁰ *Ibidem*.

⁵¹ BBC News Africa, July 28, 2025. <https://www.bbcnewsafrica.com>. Accessed on November 2, 2025 at about 15:00 hours GMT local time.

⁵² BBC News Africa, July 28, 2025. <https://www.bbcnewsafrica.com>. Accessed on November 2, 2025 at about 15:00 hours GMT local time.

⁵³ <https://lawlogngnews>, June 22, 2025. Accessed on June 24, 2025 at about 20:00 hours GMT local time.

⁵⁴ *Ibidem*.

⁵⁵ BarristerNGlaw and Pol, October 20, 2025. <https://www.barristernglawandpol>. Accessed on October 28, 2025 at about 20:28 hours GMT.

⁵⁶ LawblogNG News, June 22, 2025.

⁵⁷ <https://thenierialawyer.com>, November 18, 2025. Accessed on November 18, 2025 at about 21:13 hours, GMT local time.

⁵⁸ *Ibidem*.

⁵⁹ <https://thenierialawyer.com>, November 18, 2025. Accessed on November 18, 2025 at about 21:13 hours GMT local time.

⁶⁰ UN 2025/11/22. <https://www.un.org>. <https://thenierialawyer.com>, 2025/11/22. Accessed on November 23, 2025 at about 16:23 hours GMT local time.

⁶¹ Amnesty International, Nigeria, June 25, 2025; <https://www.amnestyinternational.org>. Accessed at about 18:00 hours GMT on 03.11.2025.

⁶² United Nation Organization Population Funds.

⁶³ E F *Ibebi*, 'The Era of Abductions in the North Central Nigeria' [2024] 3 (5) *Journal of Contemporary Legal Studies*. 25-36.

⁶⁴ <https://thenierialawyer.com>, 2025/11/19. Accessed on November 19, 2025 at about 16:25 hours GMT.

⁶⁵ *Ibidem*.

⁶⁶ Amnesty International, Nigeria, February 3, 2026; <https://www.amnestyinternational.org>. Accessed at about 17:00 hours GMT on 05: 02.2026.



taken hostage⁶⁷ to an unknown destination. Many living houses were burnt down, including the residents of the paramount ruler of Woro, his parents, and grandparents.⁶⁸ By February 22, 2026, a militia group attacked *Dorowa Babuje* in *Barikin Ladi*⁶⁹ Local Government Area of Plateau State. The attack with heavy armed engulfed the lives of Six (06)⁷⁰ persons and injured scores of people. On the same day, February 22, 2026, in the same local government Area, in the villages of *Dong* and *Lugere*, Four (04)⁷¹ persons were killed and many injured. Bandits and Herdsmen, on February 21, 2026, killed Twenty-Six (26)⁷² people and injured thousands at *Konkoso* town, in Niger State. These incidents occurred in Borgu Local Government Area of Niger State.⁷³ Twelve (12) persons were abducted, and a Police Station was burnt down, by the same militia group.⁷⁴ On June 20, 2025, a former Peoples Democratic Party (PDP) chairman and his lovely wife were killed in Benue State.⁷⁵ By June 25, 2025, Bandits and Herdsmen attacked a community in Kwara State of Nigeria and killed a father and a son.⁷⁶ On November 19, 2025, armed Bandits and Gunmen invaded Christ Apostolic Church (CAC) in *Eruku*, Kwara State and killed Three (3)⁷⁷ Christian worshipers and kidnapped Thirty-Eight (38)⁷⁸ congregants. By November 20, 2025, Gunmen and armed Bandits attacked farmers and killed Two (2),⁷⁹ and kidnapped Four (4) in Kwara State of Nigeria. On November 24, 2025, Thirty (30)⁸⁰ armed Islamic Bandits and Herdsmen invaded *Isapa* community very close to *Eruku* in Ekiti Local Government Area of Kwara State and captured Eleven (11)⁸¹ people. Recently, in Kwara State of Nigeria, on October 11, 2025, armed Bandits and Gunmen invaded a community and killed Three (3)⁸² persons and kidnapped a couple with children. On October 22, 2025, Three (3)⁸³ Independent National Electoral Commission (INEC) officials were kidnapped along Kaba-Lokoja high way while going to Anambra State for gubernatorial elections. By November 11, 2025, Six (6)⁸⁴ women from Community Day Secondary School (CDSS) Ojo Cantonment Lagos were abducted by unknown gunmen along Kaba-Lokoja highway in Kogi State. The women, were all teachers going to the Federal Capital Territory (FCT) Abuja for a conference of all Military Secondary Schools in Nigeria.⁸⁵ By June 20, 2025, a coordinated attack was launched by armed Bandits and killed Two Hundred (200)⁸⁶ people at *Yelewata* town in Benue. Within the communities of *Bokkos* and *Manguj*⁸⁷ in Plateau State of Nigeria, in June 22, 2025, Bandits launched an attack and killed Thirteen (13)⁸⁸ persons. On November 21, 2025, Amnesty International, Nigeria, reported, in 2021 alone Seven Hundred and Eighty (780)⁸⁹ children were killed or kidnapped for ransom.⁹⁰ On June 25, 2025, the extremists armed group attacked a military formation

⁶⁷ Ibidem.

⁶⁸ Ibidem.

⁶⁹ Phoenix news of February 23, 2026. <https://www.phoenixnews.com>. Accessed on 24/04/26, at 16:45 hours GMT local time.

⁷⁰ Ibidem.

⁷¹ Ibidem.

⁷² <https://thenierialawyer.com>, 2026/02/23. Accessed on February 24, 2026 at about 16:25 hours GMT.

⁷³ <https://thenierialawyer.com>, 2026/02/21.

⁷⁴ Ibidem.

⁷⁵ <https://barristerlawandpol>, 2025/06/20.

⁷⁶ <https://thenierialawyer.com>, 2025/06/25. Accessed on November 27, 2025 at about 24:02 hours GMT

⁷⁷ Ibidem.

⁷⁸ Ibidem.

⁷⁹ <https://thenierialawyer.com>, 2025/11/20. Accessed on November 20, 2025 at about 18:25 hours GMT

⁸⁰ <https://thenierialawyer.com>, 2025/11/24. Accessed on November 25, 2025 at about 20:02 hours GMT local time

⁸¹ <https://thenierialawyer.com>, 2025/11/24. Accessed on November 25, 2025 at about 20:02 hours GMT local time

⁸² <https://barristernglawandPol.com>, October 11, 2025. Accessed on October 11, 2025 at about 20:31 hours GMT local time.

⁸³ <https://thenierialawyer.com>, 2025/10/22. Accessed on October 22, 2025 at about 15:35 hours GMT

⁸⁴ Lawblog News, 2025/11/11. <https://barristernglawandPol.com>, Accessed on November 11, 2025 at about 15:31 hours GMT local time.

⁸⁵ Ibidem.

⁸⁶ Amnesty International, Nigeria, June 19, 2025. <https://www.amnestyinternationalnigeria.org>.

⁸⁷ Lawblog News, 2025/06/22. Accessed on June 23, 2025 at about 24:02 hours GMT local time.

⁸⁸ LawblogNGNews, 2025/06/22. Accessed on June 23, 2025 at about 24:02 hours GMT local time

⁸⁹ Amnesty International Nigeria, November 22, 2025. <https://www.amnestyinternationalnigeria.org>. <https://thenierialawyer.com>. Accessed on November 22, 2025 at about 24:01 hours GMT local time.

⁹⁰ Ibidem.



very close to an IDP camp in Niger State and killed Twenty (20)⁹¹ soldiers. In military establishments and her practice, the deaths of all other ranks are not announced,⁹² only those of commissioned officers are announced.⁹³ It is therefore, the implication that, for the military to announced a casualty rate of Twenty (20) soldiers, it then means that several tens of hundreds of other ranks must have died⁹⁴ in the establishment. Still in Niger State, on October 1, 2025. armed Bandits and Herdsmen invaded *Ibeto* community, within the environs of *Magama* Local Government Area of Niger State.⁹⁵ The armed invasion led to the abduction of a legal practitioner, named Isyaku Muhammad Danjuma, Esq, and Sixteen (16)⁹⁶ other indigenes of *Ibeto*, Niger State of Nigeria. On February 17, 2021, armed Bandits abducted Twenty-Seven (27)⁹⁷ students from Government Science Secondary School, Kakara within Niger State of the Nigeria. Also, in Niger State, Bandits and Herdsmen, on June 3, 2021, kidnapped One Hundred and Thirty-Six (136)⁹⁸ people from Salihu Tanko area of Niger State.

By November 21, 2025, Three Hundred and Fifteen (315)⁹⁹ students and Twelve (12)¹⁰⁰ teaching staff were kidnapped by Gunmen and Bandits from Saint Mary's Catholic Primary and Secondary Schools at *Papiri* in *Agwara* Local Government Area of Niger State. By July 8, 2025, an extremists' group launched a deadly attack in *Kukuwa* town in Plateau State and killed Seventy (70)¹⁰¹ people. In contemporary periods of June 25, 2025, Fifty-Nine (59)¹⁰² people were killed by armed Herdsmen in Guma Local Government Area of Benue State. In September 2025, armed Bandits and Herdsmen killed Eleven (11)¹⁰³ security officers and Ten (10)¹⁰⁴ men of the Nigeria Police Force in Benue State. By May 2025, armed extremist sect slaughtered Twenty-Three (23)¹⁰⁵ people and a traditional ruler in the State of Benue. In June 2025, within the Guma Local Government Area of Benue State, Fifty-Nine (59)¹⁰⁶ persons were massacred by Bandits and Herdsmen. Furthermore, by 5:19 hours Greenwich mean time (GMT), on January 5, 2026, armed Bandits invaded Gebe and Goro communities, in *Agwara* Local Government Area¹⁰⁷ of Niger State. The armed invasion on vulnerable Nigerians engulfed the lives of Forty-Two (42)¹⁰⁸ persons. Unquantified number of people were kidnapped, and Fifteen (15)¹⁰⁹ houses were set ablaze. Contemporarily, by the hours of 16:00 Green mean time (GMT), on Tuesday, January 6, 2026, armed Bandits invaded *Udoku Maav-Ya* community in *Kwande* Local Government Area of Benue State of Nigeria. The armed invasion yanked the lives of Five (5)¹¹⁰ farmers while harvesting crops in their farms.

⁹¹ Lawblog News, 2025/06/25. Accessed on June 26, 2025 at about 24:02 hours GMT local time.

⁹² S J Ayawei, "The Practice of the Military: A Practical Approach" [2017] 5 (9) *Journals of Small Wars in Africa*. 15-30.

⁹³ *Ibidem*.

⁹⁴ *Ibidem*.

⁹⁵ <https://thenierialawyer.com>, 2025/10/01. Accessed on October 2, 2025 at about 11:02 hours GMT.

⁹⁶ *Ibidem*.

⁹⁷ Al Jazeera News, February 17, 2021. <https://www.aljazeera,.a.com>. Accessed on September 29, 2025 at about 16:00 hours GMT local time.

⁹⁸ M. O. Oyeboode, "A Decade of Horror: Understanding the Complexities of Conflict and Insecurity in North Central Nigeria Through the Lens of Stakeholders" [2025] 3, (2) *Kashere Journal of Politics and International Relations*, 3027-3077.

⁹⁹ <https://thenierialawyer.com>, 2025/11/21. Accessed on November 21, 2025 at about 16:25 hours GMT.

¹⁰⁰ *Ibidem*.

¹⁰¹ <https://thenierialawyer.com>, 2025/07/08. Accessed on July 8, 2025 at about 18:44 hours GMT

¹⁰² Amnesty International, Nigeria. <https://amnestyinternationalnigeria.org>. Accessed September 30, 2025 at about 14:45 hours GMT, local time.

¹⁰³ *Ibidem*.

¹⁰⁴ *Ibidem*.

¹⁰⁵ *Ibidem*.

¹⁰⁶ Al Jazeera News, September 20, 2023. <https://www.aljazeera.com>. Accessed on September 23, 2025 at about 16:25 hours GMT.

¹⁰⁷ <https://thenierialawyer.com>, 2026/01/05. Accessed on January 5, 2026 at about 8:45 hours GMT.

¹⁰⁸ *Ibidem*.

¹⁰⁹ *Ibidem*.

¹¹⁰ LawblogNGNews, 2026/01/06. <https://www.lawblogngnews.com>. Accessed on January 8, 2026 at about 10:02 hours GMT local time



Still in Benue State, by a coordinated attack of armed Herdsmen deliberately murdered Seventy (70)¹¹¹ persons in *Umogidi* in *Oturkpo* Local Government Area of Benue State. Another attack, on April 7, 2023, Bandits and Fulani Herdsmen killed Seven (7)¹¹² persons from Agatu town within Apa Local Government Area of Benue State. On April 9, 2023, Bandits and Herdsmen attacked an IDP camp and massacred Forty (40)¹¹³ persons from *Nyiev* Ward in Guma Local Government Area of Benue State. Most of these attacks in Benue and Plateau States are targeted on Christians faithful.¹¹⁴ On May 12, 2024, Gunmen murdered Four (4)¹¹⁵ persons from *Mbachen* and *Mbagbe* Wards in the *Kwande* Local Government Area of Benue State of Nigeria. Furthermore, in June 27, 2024, armed Bandits and Fulani Herdsmen slaughtered Eleven (11)¹¹⁶ adults from Keana urban, within the Keana Local Government Area of Nasarawa State. On June 23, 2022, in Jos East Local Government Area of Plateau State, armed Bandits and Herdsmen massacred Five (5)¹¹⁷ vulnerable Nigerians. By October 7, 2023, Bandits and Herdsmen murdered Twelve (12)¹¹⁸ unprotected people of Nigeria and abducted One Hundred and Thirty-Nine (139)¹¹⁹ people in Plateau State. The group also set ablaze, Twenty-Two (22)¹²⁰ communities and settlements in the suburb of the Federal Capital Territory (FCT),¹²¹ Abuja. On January 2, 2021, Bandits and Fulani Herdsmen killed Two (2)¹²² persons and burnt Seventy (70)¹²³ living abodes in *Oturpo-Ojile* and *Ochi-Ibadan*,¹²⁴ within the Akpa Local Government Area of Kogi State. By January 2, 2024, the militia Bandits group massacred Thirty (30)¹²⁵ persons from Mangu Local Government Area of Plateau State. On December 1, 2025, armed Bandits and Herdsmen attacked a Cherubim and Seraphim Church in *Ejiba* town,¹²⁶ within the Kogi State of Nigeria. The lethal attack experienced the kidnapped of the pastor, his wife, and injury of several other worshipers.¹²⁷ In *Bayagan*, in the *Ifelodun* Local Government Area of *Kwara*¹²⁸ State, by November 29 2025, a monarch, the *Ojibara* of *Bayagan* clan, Alhaji Kamilu Salami¹²⁹ was

¹¹¹ Leadership News, April 9, 2023. <https://www.leadershipnews.com>. Accessed on October 7, 2025 at about 13:04 hours GMT local time.

¹¹² *Ibidem*.

¹¹³ Leadership News, April 9, 2023. <https://www.leadershipnews.com>. Accessed on October 7, 2025 at about 13:04 hours GMT local time.

¹¹⁴ Amnesty International, Nigeria. <https://amnestyinternationalnigeria.org>. Accessed September 30, 2025 at about 14:45 hours GMT, local time.

¹¹⁵ Leadership News, May 12, 2024. <https://www.leadershipnews.com>. Accessed on October 7, 2025 at about 13:04 hours GMT local time.

¹¹⁶ Vanguard News, June 27, 2024. <https://www.vanguardnews.com>. Accessed on October 7, 2025 at about 13:06 hours GMT local time.

¹¹⁷ *Ibidem*.

¹¹⁸ Daily Trust News, October 7, 2023. <https://www.dailytrustnews.com>. Accessed on October 29, at about 16:00 hours GMT local time.

¹¹⁹ M. O. Oyeboade, 'A Decade of Horror: Understanding the Complexities of Conflict and Insecurity in North Central Nigeria Through the Lens of Stakeholders' [2025] 3, (2) *Kashere Journal of Politics and International Relations*, 3027-3077.

¹²⁰ *Ibidem*.

¹²¹ *Ibidem*.

¹²² Leadership News, January 2, 2021. <https://www.leadershipnews.com>. Accessed on October 7, 2025 at about 13:04 hours GMT local time.

¹²³ *Ibidem*.

¹²⁴ Leadership News, January 2, 2021. <https://www.leadershipnews.com>. Accessed on October 7, 2025 at about 13:04 hours GMT local time.

¹²⁵ Al Jazeera News, January 2, 2024. <https://www.aljazeera.com>. Accessed on September 29, 2025 at about 16:00 hours GMT local time.

¹²⁶ The Nigeria Lawyer.Com News, 2025/12/01. <https://thenigerialawyernews.com>. Accessed on December 2, 2025 at about 12:00 hours GMT local time.

¹²⁷ *Ibidem*.

¹²⁸ *Ibidem*.

¹²⁹ *Ibidem*.



kidnapped in his farm by Bandits and Herdsmen. The abductors are demanding a huge sum of One Hundred and Fifty Million (₦ 150, 000. 000.00)¹³⁰ naira as ransom for his release.

Southeast Geo-political Zone

Southeastern parts of Nigeria is the home of IPOB,¹³¹ and different cult groups have niched the zone. These groups have raided many stores and shops in the markets. They have burnt down several houses and set numerous cars ablaze vide the enforcement of seat at home order, on every Monday of each week by IPOB exponents. Amnesty International, Nigeria has approximated extra judicial killings in the southeast, to about One Thousand, Eight Hundred and Forty-Four (1844) persons.¹³² This estimated massacres took place between 2021 and 2023.¹³³ Recently, a business mogul and chairman of *Jezco* Industrial groups, Chief Joseph *Ezeokafor* and a reverend sister were kidnapped on the 5th day of August, 2026 in southeastern Nigeria.¹³⁴ The kidnappers are demanding a ginormous sum of One Billion, Five Hundred Million (1.5) Billion Naira cash (₦ 1. 500, 000, 000. 00)¹³⁵ for release. After negotiations, they were found within the neighbourhood of *Ebenebe*, a border community between Anambra and Enugu States after Ten (10)¹³⁶ days of captivity. On November 24, 2025, the Nigeria Lawyer.Com News reported that over Thirty Thousand (30, 000)¹³⁷ Nigerians have been murdered in the southeast. Shops and lockup stores have been put on severe incendiarism through altercations between IPOB's adherents and traders in major markets in the southeast.¹³⁸

In July 22, 2025, gunmen attacked *Emunze* town in *Orumba* South Local Government Area of Anambra State and killed Twenty (20)¹³⁹ people. Several other persons were reportedly to have sustained grievous injuries. By November 27, 2025, the convoy of Chief Chris Ngige, the immediate past Minister of Labour and Productivity. He was also, a former Governor of Anambra State of Nigeria, was attacked by gunmen along *Nnobi* and *Nkpo* highway. Two (2)¹⁴⁰ of occupants of his personal vehicle were murdered immediately. Other individuals in the entourage sustained grievous gunshot injuries.¹⁴¹ Honourable Gulag was killed in Owerri municipal while heading to the airport. In March 2023, a male and female soldiers on uniform were slaughtered in broad daylight in Anambra State of Nigeria.¹⁴² In *Awomama* community in Imo State, along Onitsha-Owerri expressway cars and houses were set ablaze by IPOB's men.¹⁴³ By January 1, 2012, Fifty (50)¹⁴⁴ persons were killed in a communal crisis between the Ezza and Ezilo, in Ezza Local Government Area of Ebony State.

Within the window period of 2013 and early 2015, the southeast was indeed centre of kidnappings for exchange of money. It was a lucrative business venture in the geopolitical zone of the State of Nigeria. Many

¹³⁰ The Nigeria Lawyer.Com News, 2025/12/01. <https://thenigerialawyernews.com>. Accessed on December 2, 2025 at about 12:00 hours GMT local time.

¹³¹ Indigenous People of Biafra.

¹³² Amnesty International, Nigeria. September 29, 2023. <https://amnestyinternationalnigeria.org>. Accessed September 30, 2025 at about 10:45 hours GMT, local time.

¹³³ *Ibidem*.

¹³⁴ The Nigerian Lawyer News of August 7, 2026. <https://thenigerianlayer.com>. Accessed on 7th August, 2026 at about 14:00 hours GMT, local time.

¹³⁵ *Ibidem*.

¹³⁶ The Nigerian Lawyer News of August 15, 2026. <https://thenigerianlayer.com>. Accessed on 15th August, 2026 at about 16:00 hours GMT, local time.

¹³⁷ The Nigeria Lawyer.Com News, 2025/11/24. <https://thenigerialawyernews.com>. Accessed on November 26, 2025 at about 15:55 hours GMT local time.

¹³⁸ *Ibidem*.

¹³⁹ The Nigeria Lawyer.Com News, 2025/11/24. <https://thenigerialawyernews.com>. Accessed on November 26, 2025 at about 15:55 hours GMT local time.

¹⁴⁰ *Ibidem*.

¹⁴¹ *Ibidem*.

¹⁴² Arise News, June 24, 2023. <https://www.arisenews.com>.

¹⁴³ *Ibidem*.

¹⁴⁴ Voice of America News of January 1, 2012. <https://www.voiceofamericanews.com>. Accessed on April 27, 2026 at about 14.00 hours GMT local time.



indigenous people abandoned their homes and flee for safety in safer zones such as Rivers, Bayelsa, Akwa Ibom, Edo, Delta, Lagos and etcetera. *Otuacha*, in his scholarly article,¹⁴⁵ estimated more than Ten Thousand (10, 000)¹⁴⁶ persons were kidnapped for ransom, during the period under review. Those who could not afford the payment of the huge lumpsum, were killed by the captors. This era was engineered and orchestrated by a notorious gang of criminal elements who describes itself as, *Osi Kaoun Kwuo*.¹⁴⁷ These experiences were more conspicuous in Abia, Anambra, and Imo States of Nigeria. It was operation Python Dance, an armed troop deployed by the Nigerian Army, that suppress the occurrence in Anambra State. Practically, in Abia and Imo States, the Infantry Theatre Company of the Nigerian Army under the commanded by Major General *Ihejiraka* quell the flaming fire in those States.¹⁴⁸

South South Geo-political Zone

The South-South cadastral zone is known for cult practices and fraternity operations. The littoral fringes are infested with sea pirates. In the periods between 2019 to 2023, an approximated number of Six Thousand (6,000)¹⁴⁹ persons were killed by rival fraternity cult groups in Andoni area of Rivers State. Houses were set on fire, communities were deserted. Those who were perpetrating these activities are young people who are well-known¹⁵⁰ to the people in the communities. They do not hide themselves, neither mask themselves, they are identifiable. Moreso, their parents are also well-known who could be traced, yet no arrest has been made, talk less of prosecution.¹⁵¹ These groups of young men operating in Andoni environment kill with sophisticated lethal weapons and cadavers were never left to be interred. The carcasses must be taken to their group's covens or shrines for further work on the deceased.¹⁵² In *Ahoada*, in the *Ahoada* East Local Government Area of Rivers State, by August 2023, a Divisional Police Officer (DPO)¹⁵³ was ambushed and slaughtered in parts as cattle meant for retail market. The video of this innocent gentle man was beamed and posted on social media handles. The cellular lines wherein the videos were beamed and posted were neither tracked nor place on surveillance.¹⁵⁴ On November 23, 2025, at Asaba, the capital city of Delta State of Nigeria, a retired high court judge, Honourable Justice Ifeoma *Okogwu*, J¹⁵⁵ was murdered in her Asaba resident.

In Akwa Ibom State of Nigeria, people were being slaughtered daily in a communal crisis between communities in Eastern *Obolo* Local Government Area, and Ikot Abosi Local Government Area of the State.¹⁵⁶ The massive massacres and slaughtering were beamed with cellular phones and were posted into the internet.¹⁵⁷ It was streamed in all social media platforms, the telephone line which is registered in the Nigerian State vide the Nigerian Communication Commission (NCC). The cellular lines were neither tracked for questioning, nor any arrest made by the Nigeria Police Force.¹⁵⁸

Southwest Geo-political Zone

The Southwestern zone of Nigeria including federated units of Ekiti, Lagos, Ogun, Ondo, Osun, and Oyo

¹⁴⁵ H. G. *Otuacha*, 'The Era of Kidnapping in the Southeast: A Demographic Analysis' [2014] 5 (9) *Niger Delta Journal of Contemporary Research*, 45.

¹⁴⁶ *Ibidem*.

¹⁴⁷ A tree which is far taller than a palm tree.

¹⁴⁸ H. G. *Otuacha*, 'The Era of Kidnapping in the Southeast: A Demographic Analysis' [2014] 5 (9) *Niger Delta Journal of Contemporary Research*.

¹⁴⁹ G. I. Utong, 'The Era of Massacre in Andoni' [2024] 3 (5), *The Journal of Contemporary Studies in the Niger Delta*. 15-35.

¹⁵⁰ G. I. Utong, 'The Era of Massacre in Andoni' [2024] 3 (5), *The Journal of Contemporary Studies in the Niger Delta*. 15-35.

¹⁵¹ *Ibidem*.

¹⁵² *Ibidem*.

¹⁵³ Nigeria Tide News, August 22, 2023.

¹⁵⁴ *Ibidem*.

¹⁵⁵ The Nigeria Lawyer.Com News, 2025/11/23. <https://thenigerialawyernews.com>. Accessed on November 23, 2025 at about 12:50 hours GMT local time.

¹⁵⁶ Izonoge News, [https:// www.izonogenews.com](https://www.izonogenews.com). May 18, 2023.

¹⁵⁷ *Ibidem*.

¹⁵⁸ Izonoge News, [https:// www.izonogenews.com](https://www.izonogenews.com). May 18, 2023.



States is infested with multiple occult practices. The southwestern zone is not from the activities of bandits, herdsmen, *lakurawas*, masked gunmen, *mamudawa* armed groups, and extremists' groups. The most common activities are ritual killings, trading in human parts, kidnappings, abductions, rapes, and etcetera. The movement for actualization of sovereign state of Oduduwa has subjected the area into acute hostility. Bandits, on May 20, 2026, invaded three institutions of basic teaching and learning instantaneously in Ori-Ire Local Government Area of Oyo State. The armed incursions recorded the hostage of Forty-Eight (48)¹⁵⁹ tender pupils and the entire teaching staff. The three (3) basic institutions of socialization are Baptist Nursery and Primary Schools, *Yawota*; Junior Community Grammar School *Esiele*; and LA, Primary School *Ogbomoso*.¹⁶⁰ The ages of pupils being taking hostage for ransom are very tender and delicate. Some are even as tender as two and three years age at the stages of creche and kindergartens. By the 5th day of June, 2022, armed masked gunmen attacked Saint Francis Catholic Church, *Owo* in Ondo State. The attack resulted to Forty (40)¹⁶¹ casualties in the congregation and quite over hundred worshippers were grievously injured.

DEFINITION OF RELATED OFFENCES

Kidnapping: Section 271 of the Penal Code, defined kidnapping as:

“Whoever takes or entices any person, under fourteen years of age if a male or under sixteen years of age if a female, or any person of unsound mind out of the keeping of the lawful guardian of such person without the consent of such guardian or conveys any such person beyond the limits of the State without the consent of someone legally authorised the consent to such removal, is said to kidnap such person.”¹⁶²

Kidnapping under the Penal Code is punishable in section 273

“Whoever kidnaps or abducts any person shall be punished with imprisonment for a term which extend to ten years and shall also be liable to fine.”

By the above excerpts in Nigeria, any unlawful seizure, capture, hostage, or custody of persons for whichever purpose not permitted by law is kidnapping. It is punishable under the two Codes, to wit, Criminal Code and Penal Code which are operating in the country.

Abduction: This offence which is very prevalent in Nigeria, is defined under section 272 of the Penal Code as meaning:

“Whoever by force compels or by any deceitful means induces any person to go from any place, is said to abduct that person.”

Abduction, under the Criminal Code is defined in section 361 as follows:

“Any person who, with intent to marry or carnally know a female of any age, or to cause her to be married, or carnally known by any other person, takes her away, or detains her against her will, is guilty of a felony, and is liable to imprisonment for seven years.”

Under the provisions of section 362, of the Act, further defined abduction as follows:

¹⁵⁹ Unini Chioma Kate of the Nigeria Lawyer News of May 20, 2026 <https://thenierialawyer.com>. Accessed on May 22, 2026 at about 17:00 hours GMT local time.

¹⁶⁰ *Ibidem*.

¹⁶¹ The Nigeria Lawyer.Com News, 2025/12/11. <https://thenigerialawyernews.com>. Accessed on December 11, 2025 at about 18:57 hours GMT local time

¹⁶² Kidnapping under the Criminal Code, section 364 (2), provides to the following effect:

“Any person who –

(2) unlawfully imprisons any person within Nigeria in such a manner as to prevent him from applying to a court for his release or from discovering to any other person the place where he is imprisoned, or in such a manner as to prevent any person entitled to have access to him from discovering the place where he is imprisoned.

Is guilty of a felony and is liable to imprisonment for ten years.”



“Any person who unlawfully takes an unmarried girl under the age of sixteen years out of the custody or protection of her father or mother or other person having the lawful care or charge of her, and against the will of such father or mother or other person, is guilty of a misdemeanour, and is liable to imprisonment for two years.”

Under the two Codes abduction is an offence punishable by law. The offence can be committed against both genders. Strict punishment is provided for the offences of kidnapping and abduction under the Penal Code, section 274, stipulates thus:

“Whoever kidnaps or abducts any person in order that such person may be killed, or may be so disposed of as to be put in danger of being killed shall be punished with imprisonment for a term which may extend to fourteen years and shall also be liable to fine.”

Terrorism: The penultimate court in Nigeria, in *Ayobami vs The State*,¹⁶³ defined terrorism to following effect:

Terrorism is the act of intimidation of persons through the use of force and violence in order to achieve certain goal or end. The Black’s Law Dictionary describes terrorism as ‘the use of threat or violence to intimate or cause panic.’¹⁶⁴ The threat of violence associated with terrorism is always with the purpose of terrorizing another, causing serious public disorder or inconvenience, and or extortion. A threat to law and order on its own. It communicated intent or violence, to inflict loss or diminish the equilibrium of law and order in the society and amongst individuals who the law is made to protect their co-existence. It is a global common knowledge that kidnapping and extortion are some of the major activities and strategies of terrorists.

Therefore, terrorism is intentional use of force, violence and intimidation by a person or a group of persons in order to cause breakdown of law and order in a lawful society. The prime aim of any terrorist group is to cause panic, apprehension, commotion, and intimidation resulting to a total breach of peace. By this act, terrorism hampers and disrupts social, economic, political, cultural, and religious activities in the society. The coercive force is not always legitimate, but against social order and norms aimed at coaxing government and the people to achieve selfish goals or demands.

Murder: By the provisions of section 220 of the Penal Code, culpable homicide is defined as follows:

“Whoever causes death –

- (a) by doing an act with the intention of causing death or such bodily injury as is likely to cause death; or
- (b) by doing an act with the knowledge that he is likely by such act to cause death; or
- (c) by doing rash or negligent act, commits the offence of culpable homicide.”

Under section 316 of the Criminal Code,¹⁶⁵ murder is defined thus:

“Except as hereinafter set forth, a person who unlawfully kills another under any of the following circumstances, that is to say –

- (1) if the offender intends to cause the death of the person killed, or that of some other person;
- (2) if the offender intends to do to the person killed or to some other person some grievous harm;
- (3) if death is caused by means of an act done in the prosecution of an unlawful purpose, which act is of such a nature as to be likely to endanger human life;
- (4) if the offender intends to do grievous harm to some person for the purpose of facilitating the commission of an offence which is such that the offender may be arrested without warrant, or for the purpose of facilitating the flight of an offender who has committed or attempted to commit any such offence;

¹⁶³ [2017] All FWLR (Part. 886) 1964 CA; [1995, paras. A-C], *Onyemenam*, JCA.

¹⁶⁴ Ninth (9th) Edition, p. 1611.

¹⁶⁵ Cap.C38, Vol. 4, Laws of the Federation of Nigeria (LFN) 2010.



- (5) if death is caused by administering any stupefying or overpowering things for either of the purposes last aforesaid;
- (6) if death is caused by wilfully stopping the breath of any person for either of such purposes, is guilty of murder.”

The offences of murder and culpable homicide are capital offences in both codes, to wit, Criminal Code and Penal Code. They are very serious offences which are occurring almost diurnally in northeastern Nigeria.

Rape: This offence is defined under section 282 of the Penal Code as:

“(1) A man is said to commits rape who, save in the case referred to in subsection (2), has sexual intercourse with a woman in any of the following circumstances –

- (a) against her will;
- (b) without her consent;
- (c) with her consent, when her consent has been obtained by putting her in fear of death or of hurt;
- (d) with her consent, when the man knows that he is not her husband and that her consent is given because she believes that he is another man to whom she is or believes herself to be lawfully married;
- (e) with or without her consent, when she is under fourteen years of age or of unsound mind.”

Rape is defined under the Criminal Code in section 357 as follows:

“Any person who has unlawful carnal knowledge of a woman or girl, without her consent, or with her consent, if the consent is obtained by force or by means of threats or intimidation of any kind, or by fear of harm, or by means of false and fraudulent representation as to the nature of the act, or, in the case of a married woman, by personating her husband, is guilty of an offence which is called rape.”

The offence of rape is defined and punished under the two Codes. It is an offence where sexual intercourse is had against the will or consent of a woman or a girl.

Possession of Firearms: Illegal possession of firearm, is defined under section 3 of the Robbery and Firearms (Special Provisions) Act, “possession of firearms” means:

“Any person having a firearm in his possession or under his control in contravention of the Firearms Act or any order made there-under shall be guilty of an offence under this Act and shall upon conviction under this Act be sentenced to a fine of twenty thousand Naira or to imprisonment for a period of not less than ten years, or to both.”

It is the act of being in possession and control of firearm and ammunition without licence from the appropriate authority.

Arson: is defined as the intentional setting of fire on any building whether completed or not. See the provisions of section 443 of the Criminal Code.¹⁶⁶

Suicide Bombing: Is an act where the person who detonates the lethal explosive kills himself and every other person within a specific circumferential radius. This act is frequent in Nigeria. It is always carried out in crowded places such as markets, churches, mosques, and large meetings.

COGITATIONS OF INTERNAL SECURITY PROBLEMS IN NIGERIA:

Unlawful carnages, kidnappings and abductions are ongoing in Nigeria even when this article is articulated and published. By this contemporary October, 2026, a military formation in Zamfara State¹⁶⁷ was attacked and so

¹⁶⁶ Cap. C38, Vol. 4, Laws of the Federal of Nigeria (LFN) 2010.

¹⁶⁷ Izonlink Publications of October 10, 2026. A Niger Delta based publication.



many members of the armed forces were killed by bandits and herdsmen. Going by the surveyed indices, no geo-political zone in Nigeria is free from terrorists' incursions. Massacres, abductions, kidnappings, rapes, pyromania, possession and control of illegal firearms are diurnal occurrences in the sovereign State of Nigeria. A sovereignty which is unwilling to confront internal security crises within her own territory, may have existed only to the glory of the euphoric symbolism of her hoist flag. A source from, an America Magazine, revealed by,¹⁶⁸ an estimated numbered of Fifty Thousand (50,000) to One Hundred and Twenty-Five Thousand (125, 000) persons have been killed from the Christian dominated areas in northern Nigeria. The above huge estimated figures happened within the periods of 2022-2025. From the above survey, a careful reflective circumspect of recent events in Nigeria shows a very deplorable security circumstance. Recently, in December 1, 2025, in *Kafar Ruwa* area of Kano municipality, in Kano State. Residents in the area took out to the streets in protest, chanting war songs in rampage,¹⁶⁹ and burning tyres in the front of a Police Divisional Headquarters. Their demand is the immediate release of Fulani kidnappers who were arrested and kept in safe custody by the Police.¹⁷⁰ Further substantiation of the negative security indices in Nigeria, on November 29, 2025, in Chacho within the *Wurno* Local Government Area¹⁷¹ of Sokoto State. An intended couple just about to be solemnized in holy matrimony, on their way to the wedding ground. Armed Bandits and Herdsmen abducted a bride and her entire bridal train to an unknown destination, demanding a gigantic ransom of Hundred and Fifty Million (₦ 150, 000, 000.00) Naira.¹⁷²

A cogitation of the foregoing indicia, where combatant personnel of the Armed Forces, Nigeria Police are being kidnapped and massacred. On similar dimension, all other security agencies in the country who are on uniform and bear arms are in danger of these groups. What then could be of the proletariats? They are like sheep in a pride of lions, with no iota of resistance. Various terrorists' groups have been operating freely with no recourse to any existing authority. The operation of numerous armed gangs in the country appears not be checked properly. The situation is ebbing to a near lawlessness and general brigandage considering the span of existence for about two decades since 2009 till the present date. Members of terrorists' groups bear sophisticated arms and ammunitions without licence from any authority. Their targets of operations are flawlessly executed with no infinitesimal resistance from any quarter. Responses are always after when targeted operation must have been completely executed.

Contemporaneously, internal security circumstances in Nigeria appear very worse in the middle of 2026. This is so submitted in that members of the armed forces, paramilitary personnel, incumbents and former public office holders are being kidnapped and killed. This is inclusive of members of National Assembly, States' Houses of Assembly, Executive Council Members and their relatives. By this recent day of 25th July 2026, a sitting high court judge of Kebbi State Judiciary¹⁷³ was taken hostage along with his family members in the official quarters of the State's judiciary. The abductors are demanding a ginormous ransom of Two Hundred Million (₦ 200,000.000.00) Naira for their freedom. Further, in recent June 2026, a top-ranked officer in the Nigerian Army, as high as Major-General and his amiable wife were kidnapped and massacred in cold blood by known kidnappers.¹⁷⁴ Major-General Rabe Abubakar and his beloved wife Amina Abubakar were kidnapped on the 30th day of May 2026 by identified armed terrorist. The kidnapping incident occurred in *Matazu* Local Government Area of Katsina State, northwest Nigeria. By the 6th day of June, 2026, the Katsina State Government confirmed the death of the former Military Director of Defence Information (MDDI). More worrisome, before the death of Rabe Abubakar, Fifty (50) prominent men from *Matazu* town who went to

¹⁶⁸ <https://thenigerialawyernews.com>, on February 15, 2026, at 15:07 hours GMT.

¹⁶⁹ The Nigeria Lawyer.Com News, 2025/12/01. <https://thenigerialawyernews.com>. Accessed on December 2, 2025 at about 19:45 hours GMT local time

¹⁷⁰ *Ibidem*.

¹⁷¹ The Nigeria Lawyer.Com News, 2025/11/29. <https://thenigerialawyernews.com>. Accessed on December 2, 2025 at about 3:51 hours GMT local time

¹⁷² The Nigeria Lawyer.Com News, 2025/11/29. <https://thenigerialawyernews.com>. Accessed on December 2, 2025 at about 3:51 hours GMT local time

¹⁷³ <https://barristernglawandPol.com>, Accessed on July 25, 2026 at about 18:31 hours GMT local time.

¹⁷⁴ Daily Justice News of June 19, 2026. <https://www.dailyjusticenews.com>. Accessed on the 19th of June 2026 at about 13:00 hours GMT local time.



negotiate the freedom of the army chieftain were still held hostage. The captors are demanding in exchange of their freedom a blustering sum of One Billion (₦ 1. 000,000,000.00)¹⁷⁵ Naira ransom. In addition to this heart aching demand, they are also asking for additional One Hundred (100) motor cycles. On the 28th day of July 2026, another top ranking serving officer of the Nigerian Army, Colonel Abdussalam A. Ude¹⁷⁶ was kidnapped and murdered. This incident took place in *Naridon* community, in Kauru¹⁷⁷ Local Government Area of Kaduna State. By Friday, August 21st 2026, terrorist invaders invaded *Kpenya* in the District of Dekara in *Borgu* Local Government Area of Niger State.¹⁷⁸ The group looted neighbouring communities of Gidan Zana, Sabon Gida, and Masaka within same local government area.¹⁷⁹ Furthermore, in *Ifoledun* Local Government Area in *Kwara* State of Nigeria, a monarch was kidnapped and was killed in June 2026. This was so sordid and troublesome after being paid an enormous ransom of Eighteen Million (₦ 18, 0000.0000.00)¹⁸⁰ naira to the abductors.

In all the foregoing indices, the State of Nigeria seemed to have breached the fundamental imperative of the doctrine: “*Salus Populi Est Suprema Lex*,”¹⁸¹ inherently sworn to be kept and protected by all States. By this sound doctrine of humanity, certain imperatives are incorporated under Chapter Two (2) of the Constitution,¹⁸² christened as Fundamental Objectives, and Directive Principles of State’s Policy.¹⁸³ It is further submitted, the obligation to safeguard, protect, and preserve lives within the within a territory is sacrosanct. This is premised on the fact, at the original position on the negotiation table during the social contract arrangement. The State elected for safety, protection and preservation of lives and property of all citizens. Going by this contractual relationship, the natural man who had been protecting himself against assailants relinquished his weaponry and armaments to the State leaving him bear and unprotected. A thorough reflection of the current happening in Nigeria, the State appears to have reneged her own obligation in the contract. In contractual relationship, where a party defaults to perform her obligation, the other party is entitled for action. The performance of the principal organic responsibility of safeguarding lives in Nigeria seems to have ebbed down. Therefore, the Nigerian State might be held accountable for permissively allowing excessive loss of lives and other criminal activities to prevail in her own territory. This situation in Nigeria has attracted the global communities. Just recently, in the last quarter of 2025, the United States of America has described Nigeria as a Country of Particular Concern (CPC). By this, the USA, President, Donald Trump has threatened military invasion to curb the ongoing internal security challenges in the country.

JURISPRUDENTIAL SYNTHESIS AND LEGAL EVALUATION

Based on the foregoing surveyed security indices from the six geo-political zones of Nigeria, and the findings of the work. Acts of terrorism are eminently manifest in all the geo-political zones. Act of terrorism is defined under the Terrorism (Prevention and Prohibition) Act, 2022. Section 2,¹⁸⁴ subsection (3), lists numerous acts which constitute act of terrorism:

“In this Act, “act of terrorism” means an act wilfully performed with the intention of furthering an ideology, whether political, religious, racial, or ethnic, and which—

¹⁷⁵ *Ibidem*.

¹⁷⁶ <https://lawlogngnews>, July 28, 2026. Accessed on July 29, 2026 at about 20:00 hours GMT local time.

¹⁷⁷ *Ibidem*.

¹⁷⁸ Naija News.com of August 21, 2026. Accessed on 21st August 2026, at about 14:00 hours GMT.

¹⁷⁹ *Ibidem*.

¹⁸⁰ Unini, Chioma Kate of the Nigeria Lawyer News of June 20, 2026 <https://thenierialawyer.com>. Accessed on June 22, 2026 at about 17:00 hours GMT local time.

¹⁸¹ Meaning the safety of the people is the supreme law of any State. In some circumstances, the phrase is used in the fundamental categorical imperative, *Salus Populi Suprema Lex Esto*; Referring, let the safety of the people be the supreme law of the State.

¹⁸² The Constitution of the Federal Republic of Nigeria (CFRN) 1999.

¹⁸³ Section 14 (2), (b) provides thus:

“The security and welfare of the people shall be the primary purpose of government.”

Section 17 (2), (b) entrenches as follows:

“The sanctity of the human person shall be recognised and human dignity shall be maintained and enhanced.”

¹⁸⁴ Subsection (1), enacts thus: “All acts of terrorism and the financing of terrorism are prohibited.”



- (a) may seriously harm or damage a country or an international organization;
- (b) unduly compels a government or international organization to perform or abstain from performing any act;
- (c) seriously intimidates a population;
- (d) seriously destabilizes or destroys the fundamental political, constitutional, economic, or social structures of a country or an international organization;
- (e) influences a government or an international organisation by intimidation or coercion;
- (f) violates the provisions of any international treaty or resolution to which Nigeria is a party, subject to the provisions of Section 12 of the Constitution of the Federal Republic of Nigeria, 1999; and
- (g) involves or causes, or results in—
 - i. attack on a person's life, in the form of grievous bodily harm or death;
 - ii. kidnapping of a person;
 - iii. destruction of Government or public facility, a transport system, an infrastructural facility, including national critical information infrastructure, a fixed platform located on the continental shelf, a public place or private property, which may likely endanger human life or result in a major economic loss;
 - iv. the seizure of an aircraft, ship or other means of public transport or conveying goods, or the diversion or use of such means of transportation or conveyance for the purposes of subparagraph (iii) of this paragraph;
 - v. the manufacture, possession, acquisition, transportation, transfer, supply, or use of weapons, including explosives or biological, chemical, radiation or nuclear, weapons (BCRN) weapons, as well as research into, and development of BCRN weapons without lawful authority, and the receipt, possession, use, transfer, alteration, disposal, or disposal of nuclear or other radioactive material or devices;
 - vi. the release of dangerous substance, causing of fire, explosions or floods, the effect of which is to endanger human life;
 - vii. interference with or disruption of the supply of water, power, or any other fundamental natural resource, the effect of which is to endanger human life;
 - viii. the release into the environment or any part thereof, or distribution or exposure of the public or any part to dangerous, hazardous, nuclear, or other radioactive or harmful substance, or any toxic chemical, microbial or other biological agent or toxin, the effect of which is to endanger human life or to provoke substantial damage to property or to the environment;
 - ix. endangering or engaging in acts likely to endanger the safety of an aircraft, ship, train, or any other means of transportation;
 - x. the bombing and other acts of violence at airports and other public places; ...,

All the acts listed above are prohibited acts and are punishable under Part V of the enabling Act, to wit, Terrorism (Prevention and Prohibition) Act, 2022.

The above acts as described by the enabling Act¹⁸⁵ are ongoing in the State of Nigeria. Where these activities are scaled on the pendulum of criminal justice, the perpetrators will not escape conviction. The predominant activities of murders, kidnappings, abductions, suicide bombings, arsons, rapes, acts of terrorism, and illegal possession of firearms are grievous felonies. The penal sanctions of most activities ongoing in the six geo-political zones are capital punishment and life imprisonment. There is no iota of doubt that the prevalence activities possess the two essential elements required to sustain criminal conviction. The physical and mental elements, to wit, *actus reus* (guilty act), and *mens rea* (guilty mind), are readily available for criminal assessment. The numerous acts of unlawful killings, kidnappings, abductions, possession of sophisticated lethal weapons without licence, arsons, and rapes are evidence of the physical ingredients. These acts speak for themselves in contemporary Nigeria, which occurs diurnally in either of the six geo-political zones. Therefore, the physical ingredients are available for criminal evaluation. Having shown the guilty acts (*actus reus*), what is remaining is to inquire into the intention of the activities, which is the mental element (the guilty mind). Do the terrorists' groups have intention of doing what they are doing? Yes, they do! It is of criminal jurisprudence,

¹⁸⁵ Terrorism (Prevention and Prohibition) Act, 2022.



intention to perform an act is always inferred from the natural consequences of the act and the instrument used. In *Afolabi vs The State*,¹⁸⁶ the Supreme Court of Nigeria, per *Okoro, JSC*, observed thus:

“Intention, which is not tangible, can be inferred from the instrument used to commit the crime, the force used and the part of the body on which the injury was inflicted.”

Furthermore, in *Hym vs DPP*,¹⁸⁷ per Brown, C J, opined thus:

“Even the devil does not know the mind of a man except the intent is transformed into an Act.”

Where a person uses a loaded firearm and aimed at another person and pulls the trigger, as it is happening in Nigeria. What then is the intention? Is to outrightly exterminate that other person! Better still, where a gang of kidnappers uses lethal weapons to kidnap or abducts school pupils. Thereafter, demands huge sum of money for ransom! What is the intention of the kidnappers? It is deliberate with criminal intent to kill or extort money from the people of Nigeria. The perpetrated acts in all the six geo-political zones are premeditated and well-intended to kill, maim or cause bodily harm. This is provided under subsection (2) of section 316 of the Criminal Code.¹⁸⁸

“If the offender intends to do to the person killed or to some other person some grievous harm.”

Nigeria operates dual criminal codes, in all the Codes, unlawful taking of life is a grievous offence punishable by death.¹⁸⁹ It is known as murder¹⁹⁰ in southern Nigeria and culpable homicide¹⁹¹ punishable with death in northern Nigeria. Sanctity of life is protected and sanctioned under the 1999 Constitution. Sections 33 (1) and 35 (1) of the Constitution,¹⁹² protects and preserves lives of people who are living in Nigeria. Particularly, subsection (1), of section 33, of the *Grundnorm*,¹⁹³ entrenches as follows:

“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.”

The only exceptions to take life of another person, are contained under subsection 2, paragraphs (a) - (c), of section 33, of the Constitution,¹⁹⁴ which states as follows:

“A person shall not be regarded as having been deprived of his life in contravention of this section, if he dies as a result of the use to such extent and in such circumstances as are provided by law, of such force as is reasonably necessary –

- a) for the defence of any person from unlawful violence, or for the defence of property;

¹⁸⁶ [2016] 11 NWLR (Part 1524) 497 SC; [519, paras. G-F].

¹⁸⁷ (1974) 2 All EL, 41.

¹⁸⁸ Cap.C38, Vol. 4, Laws of the Federation of Nigeria (LFN) 2010.

¹⁸⁹ Section 306 of the Criminal Code Act, entrenches thus:

“It is unlawful to kill any person, unless such killing is authorized or justified or excused by law.”

¹⁹⁰ Section 319 (1) of the Criminal Code Act, Cap. C38, Vol. 4, Laws of the Federation of Nigeria (LFN) 2010, entrenches to the following effect:

“Subject to the provisions of this section of this Code, any person who commits the offence of murder shall be sentenced to death.”

¹⁹¹ Section 221 of the Penal Code Law, stipulates thus:

“Except in the circumstances mentioned in section 222 culpable homicide shall be punished with death. (a) If the act by which the death is caused is done with the intention of causing death; or

(b) If the doer of the act knew or had reason to know that death would be the probable and not only a likely consequence of the act or of any bodily injury which the act was intended to cause.”

¹⁹² The Constitution of the Federal Republic of Nigeria (CFRN) 1999.

¹⁹³ *Ibidem*.

¹⁹⁴ *Ibidem*.



- b) in order to effect a lawful arrest or to prevent the escape of a person lawfully detained; or
- c) for the purpose of suppressing a riot, insurrection or mutiny.”¹⁹⁵

Section 35 (1) enacts to the following effect:

“Every person shall be entitled to his personal liberty and no person shall be deprived of such liberty save in the following cases and in accordance with a procedure permitted by law.”¹⁹⁶

The excessive massacres going on in the six geo-political zones are not within the exceptions as provided by law. The acts are wilful and well-intended. Wherefore, those who are behind the carnages are liable for sentence of death, if prosecuted. Since life is firmly protected by the 1999 Constitution, and any infringement is justiciable. See section 46 (1)¹⁹⁷ of the Constitution.¹⁹⁸

The predominant acts of kidnapping, abduction, and taking of hostage are capital offences and imprisonment for life under the Terrorism (Prevention and Prohibition) Act, 2022. Section 24,¹⁹⁹ stipulates as follows:

“(1) A person, who knowingly or intentionally –

(a) seizes, detains, or attempts to seize or detain a person, property, or facility in order to compel a third party to do or abstain from doing a lawful act,

(b) threatens to kill, injure or continue to detain a person in order to compel a third party to do or abstain from doing a lawful act, or

(c) gives an explicit or implicit for the release of the person held hostage, or the property or facility detained, commits an offence.

(2) (a) A person who commits an offence under subsection (1), is liable on conviction –

(a) where death does not result from the act, to life imprisonment; or

(b) where death results from the act, to a death sentence.”

¹⁹⁵ See also Section 52 (1) (a) - (b), of the Armed Forces Act, Vol. I, Cap A 20; Laws of the Federation of Nigeria, (LFN), 2010. Stream also, Sections: 273, 276, 282, 284, and 285, of the Criminal Code Act, Vol. 4, Cap C38, Laws of the Federation of Nigeria, (LFN), 2010.

¹⁹⁶ Paragraphs (a) – (f) contains the exceptions to the deprivation of personal liberty, which states thus:

- (a) In execution of the sentence or order of a court in respect of a criminal offence of which he has been found guilty;
- (b) By reason of his failure to comply with the order of a court or in order to secure the fulfilment of any obligation imposed upon him by law;
- (c) For the purpose of bringing him before a court in execution of the order of a court or upon reasonable suspicion of his having committed a criminal offence, or to such extent as may be reasonably necessary to prevent his committing a criminal offence;
- (d) In the case of person who has not attained the age of eighteen years, for the purpose of his education or welfare;
- (e) In the case of a person suffering from infections or contagious disease, persons of unsound minds, persons addicted to drugs or alcohol or vagrants, for the purpose of their care or treatment or the protection of the community; and or
- (f) For the purpose of preventing the unlawful entry of any person into Nigeria or of effecting the expulsion extradition or other lawful removal from Nigeria of any person or the taking of proceeding relating thereto.

Provided that a person who is charged with an offence and who has been detained in lawful custody awaiting trial shall not continue to be kept in such detention for a period longer than the maximum period of imprisonment prescribed for the offence.

¹⁹⁷ “Any person who alleges that any of the provision of the Chapter has been, is being or likely to be contravened in any state in relation to him may apply to a High Court in that State for redress.”

¹⁹⁸ The Constitution of the Federal Republic of Nigeria (CFRN) 1999 as amended.

¹⁹⁹ Terrorism (Prevention and Prohibition) Act, 2022.



The acts of kidnapping, abduction, and hostage taking which have saturated the six geo-political zones are also felonious offences under the Criminal Code.²⁰⁰ These are provided under the following sections, to wit, (7)²⁰¹ and (10).²⁰² Rape is a grievous felony under the two operational Codes. It is an act of having sexual intercourse against will of the prosecutrix. The penal sanction under the Criminal Code is life imprisonment. Section 358,²⁰³ enshrines to the following effect:

“Any person who commits the offence of rape is liable to imprisonment for life, with or without canning.”

Incendiarism (arsons) which are perpetrated in all the six geo-political zones of the country, is a grievous felony punishable by life imprisonment. Section 443²⁰⁴ entrenches as follows:

“Any person who wilfully sets fire to any of the following –

(a) Any building or structure whatever, whether completed or not; ...,

is guilty of a felony and is liable to imprisonment for life.”

The act of having possession and control of firearms and ammunitions is punishable by law in Nigeria. Section 3 (1),²⁰⁵ stipulates to the following effect:

“Any person having a firearm in his possession or under his control in contravention of the Firearms Act or any order made there-under shall be guilty of an offence under this Act and shall upon conviction under this Act be sentenced to a fine twenty thousand Naira or imprisonment for a period of not less than ten years, or to both.”

Flowing from the statutory analysis, the prevalence acts of murders, kidnappings, abductions, arsons, rapes, and illegal possession of firearms have serious criminal consequences. These acts, if subjected to criminal trial will not lead to exculpation, but conviction which will either be death sentence or life imprisonment.

CONCLUSION

From the foregoing analysis and the security challenges as surveyed in the six geopolitical zones of the country. It is convenient to conclude that, from all known criminal theories and models in the world, the perpetrated activities are offences known to criminal jurisprudence. The acts of murders, kidnappings, abductions, arsons, rapes, and possession of illegal firearms have grave criminal consequences. Accordingly, where the above acts are measured on the scale of criminal justice administration, the culprit will not be absolved. It is therefore, the recommendation that the process of weaponry be applied to whittle the goons and

²⁰⁰ Criminal Code Act, Cap.C38, Vol. 4, Laws of the Federation of Nigeria (LFN) 2010.

²⁰¹ Abduction, section 361 of the Criminal Code provides:

“Any person who, with intent to marry or carnally know a female of any age, or to cause her to be married, or carnally known by any other person, takes her away, or detains her against her will, is guilty of a felony, and is liable to imprisonment for seven years.”

Under the provisions of section 362, of the Act, it states thus:

“Any person who unlawfully takes an unmarried girl under the age of sixteen years out of the custody or protection of her father or mother or other person having the lawful care or charge of her, and against the will of such father or mother or other person, is guilty of a misdemeanour, and is liable to imprisonment for two years.”

²⁰² For kidnapping, section 364 (2) of the Criminal Code Act, provides to the following effect:

“Any person who –

(2) unlawfully imprisons any person within Nigeria in such a manner as to prevent him from applying to a court for his release or from discovering to any other person the place where he is imprisoned, or in such a manner as to prevent any person entitled to have access to him from discovering the place where he is imprisoned.

Is guilty of a felony and is liable to imprisonment for ten years.”

²⁰³ Criminal Code Act, Cap.C38, Vol. 4, Laws of the Federal of Nigeria (LFN) 2010.

²⁰⁴ *Ibidem*.

²⁰⁵ Robbery and Firearms (Special Provisions) Act.



marauders operational base and foundation. Prosecution of anyone caught in the ongoing terrorist invasion should be strictly tried and punished according to law. Judicial officers who are handling terror related matters in the country should be maximumly protected to prevent sudden attack. It is further recommended that special jurisdiction of the high court be established to handle only acts of terrorisms and terror related to ensure speedy trials. That all matters concerning acts of terrorism, terrorists and matters incidental thereto should be conducted on accelerated proceedings.