

## The Effect of Conversion of Extradition Methods and Unlawful Deportation on Human Rights in Nigeria

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### ABSTRACT

This study examines how the practices of secret extradition and illegal deportation violate human rights protection in Nigeria, and in particular, how such violations weaken constitutional privilege and international normative principles. The objective of this study is to examine the legal and human rights implications, particularly in situations where individuals are transferred across borders without due process or judicial supervision. Using a doctrinal research approach that is complemented by a review of national laws and extra-territorial policies, the study uses both the example of the rendition of Nnamdi Kanu and an attempted kidnapping of Umaru Dikko, among others, to argue that there appears to be a trend towards state-execution-led extra-territorial enforcement practices. The study shows that such clandestine operations often contravene the most basic rights, such as the right to a fair trial, protection against torture and the right to liberty and security of the person. The study further demonstrates an enduring conflict between the Nigerian state's interest in national security at all costs and a statutory and human right commitment under domestic and international law. The research holds that the lack of transparency, absence of legal guarantees and failure to comply with established extradition processes are undermining the rule of law and creating dangerous precedents of impunity. It calls for legislative and legal overhauls combined with enhanced judicial supervision, and respect for due process as necessary steps to herald in national security considerations in tandem with Nigeria's human rights obligations.

## Introduction

Extradition, as a formal removal of an accused or convicted person across different states for trial or punishment, is a significant area of international collaborative activity in criminal justice.<sup>1</sup> The validity of the exercise, however, depends largely upon rigid adherence to the principles of due process, legality, and

<sup>1</sup> Godswill Owoche Antai, "An Appraisal of the Historical Development of the African Response to Extradition," *Newport International Journal of Current Research in Humanities and Social Sciences* 4, no. 3 (March 23, 2024): 27–35, <https://doi.org/10.59298/NIJCRHSS/2024/4.3.2735>.

observance of fundamental human rights.<sup>2</sup> Nigeria, like other states, has a comprehensive codification of the legal regime on extradition at the national level through laws, most notably the Extradition Act, supplemented by a series of bilateral and multilateral treaties to which Nigeria is a signatory.<sup>3</sup> Despite this, a recent but alarming trend is the widening resort to clandestine extradition methods and unauthorised deportation, at times without the sanction of judicial warrant or due observance of established processes.<sup>4</sup> These incidents, which are occasionally politically motivated or carried out under the pretext of national security needs, raise concerns regarding fundamental human rights.<sup>5</sup>

Covert extradition measures such as extraordinary rendition, abduction, or irregular transfers bypass the shield against arbitrary detention, torture,<sup>6</sup> cruel treatment, and unfair trials. Illegal deportation, particularly when done without allowing the subjects to seek remedies under the law, derogates from the principles of non-refoulement and the right to seek asylum.<sup>7</sup> Cases involving irregular transfers of individuals to other jurisdictions in Nigeria have brought to the forefront the legality and constitutionality of these actions.<sup>8</sup> They have sparked domestic and international discourse on the government's commitment to promoting human rights and the rule of law.<sup>9</sup> This research aims to analyse the impacts of those practices on Nigeria's human rights record. Of concern is the extent to which secret extraditions and unauthorised deportations violate constitutionally enshrined rights

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<sup>2</sup> Modestus Chiedozi Adimekwe, "Legal, Social and Religious Perspectives on the Status of Human Rights in Nigeria," in *The Impact of Religion, Personality, Values and Worldviews on Attitudes Towards Human Rights* (Cham: Springer, 2024), 49–234, [https://doi.org/10.1007/978-3-031-65749-8\\_3](https://doi.org/10.1007/978-3-031-65749-8_3).

<sup>3</sup> Thaddeus Chukwuka Eze, "Exploring the Politics and Law of Extradition in International Relations," *Nnamdi Azikiwe University Journal of International Law and Jurisprudence* 12, no. 2 (2021): 1–10, <https://www.ajol.info/index.php/nauijilj/article/view/215297>.

<sup>4</sup> Victor Nonso Enebeli, "A Scholarly Examination of Extradition Law in Nigeria and Its Implications within the Framework of International Law," *Journal of Law, Policy and Globalization* 139 (January 2024): 76–88, <https://doi.org/10.7176/JLPG/139-10>.

<sup>5</sup> Leonid Lichman et al., "Principle of Reasonableness in International Standards of Civil Proceedings," *International Journal of Law, Crime and Justice* 69 (June 2022): 100529, <https://doi.org/10.1016/j.ijlcj.2022.100529>.

<sup>6</sup> Kasim Balarabe, "Improving Mechanisms for the Implementation of International Humanitarian Law," *Kampala International University Law Journal (KIULJ)* 1, no. 1 (2017): 186–2014, <https://kiulj.kiu.ac.ug/article-view.php?i=11&t=improving-mechanisms-for-the-implementation-of-international-humanitarian-law>.

<sup>7</sup> Eman Hamdan, *The Principle of Non-Refoulement under the ECHR and the UN Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment* (Leiden, The Netherlands: Brill | Nijhoff, 2016), <https://doi.org/10.1163/9789004319394>.

<sup>8</sup> Oluwaseyi A. Leigh et al., "Examining the Scope of 'in the Course of Employment' as a Prerequisite for Entitlement to Compensation under the Workmen and Employees' Compensation Acts," *Kampala International University Law Journal (KIULJ)* 6, no. 2 (2024): 31–51, [https://kiulj.kiu.ac.ug/article-view.php?i=123&t=examining-the-scope-of-\"in-the-course-of-employment\"-as-a-prerequisite-for-entitlement-to-compensation-under-the-workmen-and-employees-compensation-acts](https://kiulj.kiu.ac.ug/article-view.php?i=123&t=examining-the-scope-of-\).

<sup>9</sup> Paul Aidonojie, "The Legal Impact and Relevance of Using Plea Bargains to Resolve Tax Disputes in Nigeria," *Branjaya Law Journal* 9, no. 2 (October 31, 2022): 196–212, <https://doi.org/10.21776/ub.blj.2022.009.02.06>.

and international human rights obligations, particularly under human rights treaties such as the African Charter on Human and Peoples' Rights, the International Covenant on Civil and Political Rights (ICCPR), and the Convention Against Torture.<sup>10</sup> It also analyses the reaction of Nigeria's judiciary to those practices and discusses the remedies for accountability for the victims of those rights violations.

The discussion of secret transfers or wrongful deportation in the context of human rights has received considerable scholarly attention globally; however, subject-specific and comprehensive studies in Nigeria are not commensurate with the global attention given to this discourse. Scholars like Weissbrodt and Bergquist<sup>11</sup> suggest that the practice of sending suspects across borders in secret, most commonly referred to as extraordinary rendition, attacks the principle of legality, due process and torture prohibition, which are principles of international human rights law. These apprehensions are echoed in Efrat and Newman,<sup>12</sup> who rightly point out that clandestine extraditions circumvent judicial scrutiny, and are open to abuse, arbitrary detention and the inhumane treatment of suspects, particularly in jurisdictions with limited institutional guarantees. More generally, in the African context, as noted by Hatchard<sup>13</sup> the greater number of African states cooperate on transnational crime problems, the greater the level of tension that it is likely to invoke, especially where the realities of these extraterritorial practices, when they are not executed through legal and formal channels of cooperation, constitute (severe) human rights abuses and international tensions. Scholarly works on extradition in Nigeria have been procedurally inclined. For example, Harrington<sup>14</sup> focuses on the Extradition Act and government international obligations without discussing the human rights implications of flouting these legal processes. Essien<sup>15</sup> has more recently critiqued Nigeria's deportation practices, but focused on the paradigm of immigration control and the domestic legality, while overlooking the transnational

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<sup>10</sup> Peter Eshioke Egielewa and Paul Atagamen Aidonojie, "Media and Law: An Assessment of the Effectiveness of the Freedom of Information Act by Journalists in Nigeria Using Auchi, Edo State as a Case Study," *International Journal of Current Research in Humanities* 25, no. 1 (2019): 415–34, [https://old.edouniversity.edu.ng/oer/journal/media\\_and\\_law\\_an\\_assessment\\_of\\_the\\_effectiveness\\_of\\_the\\_freedom\\_of\\_information\\_act\\_by\\_journalists\\_in\\_nigeria\\_using\\_auchi\\_edo\\_state\\_as\\_a\\_case\\_study](https://old.edouniversity.edu.ng/oer/journal/media_and_law_an_assessment_of_the_effectiveness_of_the_freedom_of_information_act_by_journalists_in_nigeria_using_auchi_edo_state_as_a_case_study).

<sup>11</sup> David Weissbrodt and Amy Bergquist, "Extraordinary Rendition: A Human Rights Analysis," *Harvard Human Rights Journal* 19 (2006): 123, [https://scholarship.law.umn.edu/faculty\\_articles/245/](https://scholarship.law.umn.edu/faculty_articles/245/).

<sup>12</sup> Asif Efrat and Abraham L Newman, "Defending Core Values: Human Rights and the Extradition of Fugitives," *Journal of Peace Research* 57, no. 4 (July 28, 2020): 581–96, <https://doi.org/10.1177/0022343319898231>.

<sup>13</sup> John Hatchard, "Combating Transnational Crime in Africa: Problems and Perspectives," *Journal of African Law* 50, no. 2 (October 14, 2006): 145–60, <https://doi.org/10.1017/S0021855306000131>.

<sup>14</sup> Joanna Harrington, "The Absent Dialogue: Extradition and the International Covenant on Civil and Political Rights," *Queen's Law Journal* 32, no. 1 (2006): 82–134, <https://doi.org/https://doi/10.3316/agispt.20220916074156>.

<sup>15</sup> Essien Essien et al., "Immigrational Exclusion in the West and Exile Culture in Africa: Exploring Parallels and Biopower Dynamics," *Sprin Journal of Arts, Humanities and Social Sciences* 3, no. 3 (March 4, 2024): 12–20, <https://doi.org/10.55559/sjahss.v3i3.234>.

dimensions and subterranean forms that deportations take, especially in politically sensitive or high-profile cases.

There is a lacuna in the literature regarding the extent to which Nigeria's act of clandestine extradition and illegal deportation, such as politically-involved cases, epitomised by Nnamdi Kanu's case, affects established core human rights norms and principles under both domestic and international law. Few studies have thoroughly examined the scaffolding that supports such practices, the legal manoeuvres employed, and the erosion of rights that result from the systemic routinization of such policies. In addition, there is no comparative legal research that places the practices in Nigeria in the wider international human rights system, as well as measures when it comes to international best practices and jurisprudence. This study fills these lacunae by providing a comprehensive, interdisciplinary treatment of Nigeria's practices of secret extradition and illegal deportation, using a combination of case studies, relevant legal norms and the resulting human rights consequences. Its principles link doctrinal and analytic approaches to overcoming the gap between abstract norms and the actualities of those affected and further suggests practical legal and policy reforms to bring Nigeria's practices in line with its constitutional and international human rights obligations. Thus, the novelty of this article lies in its attempt to make a significant academic contribution that not only criticizes state practices but also deepens the discussion on accountability, transparency, and the protection of human rights in transnational criminal justice cooperation, which the government needs to undertake to resolve legal issues regarding secret extradition and illegal deportation practices in Nigeria.

## Methods

Using a doctrinal-based research methodology, the study is grounded in primary and secondary legal sources, comprising statutes, case law, international agreements, and scholarly commentaries.<sup>16</sup> The research examines the gaps that exist theoretically and practically between Nigeria's legal regime and the actual practice of its security and immigration organisations. The study posits that the frequent occurrence of these irregularities is a sign of a pervasive failure by institutions to embed the rule of law, human rights compliance, and judicial autonomy. lastly, the research intends to contribute to the widening body of legal opinion demanding reform of Nigeria's extradition and deportation practice. The research makes evidence-based recommendations which would harmonise Nigeria's practice with its international human rights commitments and domestic constitution. This would ensure that the use of extradition and deportation is not exploited as a tool for repression or political expediency.

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<sup>16</sup> Shauhin Talesh, Elizabeth Mertz, and Heinz Klug, *Research Handbook on Modern Legal Realism*, ed. Shauhin Talesh, Elizabeth Mertz, and Heinz Klug (Cheltenham: Edward Elgar Publishing, 2021), <https://doi.org/10.4337/9781788117777>.

## Discussion

### The Concept of Extradition and Rendition

The reality is that sometimes Governments desire to have their way by all means necessary,<sup>17</sup> so instead of being patient to exhaust the extradition process or follow procedures or perhaps due to the lack of a treaty with the state wherein the fugitive is hiding, they tend to forcefully export the individual through a Gestapo style operation so that individual can stand trial in the home state,<sup>18</sup> this has been described as extraordinary rendition and is frowned on as being anti-human rights and contrary to established international law principles of respect for territorial integrity of other states.<sup>19</sup> In this section, we examine some cases that have gained attention in recent years, even though they may not have direct application, as they are not founded on international crimes jurisprudence; however, they are relevant due to the extradition or rendition element in the cases<sup>20</sup> Deportation and extradition, although often regarded in public opinion as being used interchangeably, are, by definition, distinct.<sup>21</sup> Deportation is a unilateral action by a state expelling an alien from its territory for a violation of immigration regulations.<sup>22</sup> Extradition is a judicial or multilateral proceeding for the rendition of a person from a requested state to a requesting state, for the purpose of prosecution, conviction, and sentence to be served in the requesting state.<sup>23</sup> When an extradition agreement exists between two states, the requested state is under a duty to deliver the accused into the control

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<sup>17</sup> Pablo del Hierro and Lucas Lixinski, "Writing a Transnational (Global?) History of Extradition Law in the Short Twentieth Century: Beyond Western-Centric Approaches," *Journal of the History of International Law / Revue d'histoire Du Droit International* 25, no. 3 (April 11, 2023): 429–66, <https://doi.org/10.1163/15718050-bja10082>.

<sup>18</sup> David Crew, *Nazism and German Society, 1933-1945*, ed. David Crew (London: Routledge, 2013), <https://doi.org/10.4324/9780203131596>.

<sup>19</sup> Godswill Owoche, Antai, "Methods of Judicial Cooperation and the Procedure for Enforcement Under International Law; Identifying the Nexus between Theory and Practice," *Newport International Journal of Current Research in Humanities and Social Sciences* 4, no. 3 (April 21, 2024): 80–88, <https://doi.org/10.59298/NIJCRHSS/2024/4.3.8088>.

<sup>20</sup> Geoff Gilbert, "Undesirable but Unreturnable: Extradition and Other Forms of Rendition," *Journal of International Criminal Justice* 15, no. 1 (March 2017): 55–74, <https://doi.org/10.1093/jicj/mqx003>.

<sup>21</sup> Paul Atagamen Aidonojie et al., "Examining Human Rights Abuses on Religious, Cultural, and Political Intolerance in Nigeria," *Journal of Sustainable Development and Regulatory Issues (JSDERI)* 3, no. 1 (January 28, 2025): 78–94, <https://doi.org/10.53955/jsderi.v3i1.55>.

<sup>22</sup> Asha Kaushal, "From the Inside Out: The Coercive Power of Deportation and the Erosion of the Liberal Democratic State," *Oxford Journal of Legal Studies* 43, no. 2 (June 6, 2023): 350–78, <https://doi.org/10.1093/ojls/gqad001>.

<sup>23</sup> Magnus Killander, "Extraterritoriality and Africa: In Search of Justice," in *Research Handbook on Extraterritoriality in International Law* (United Kingdom: Edward Elgar Publishing, 2023), 195–209, <https://doi.org/10.4337/9781800885592.00020>.

of the requesting state.<sup>24</sup> Beyond the point of principle, deportation and extradition have remained contentious aspects of state law, and this trend has intensified with the growing importance of human rights concerns in international jurisprudence.<sup>25</sup> In some cases, the practices run contrary to regional regimes' standards of human rights, e.g., the European Convention for Human Rights.<sup>26</sup>

Extradition must be distinguished from similar concepts, including rendition, transfer, and expulsion.<sup>27</sup> Extradition is a symbol of a state's commitment to international co-operation for legal enforcement and criminal justice standards.<sup>28</sup> Extradition is likely to succeed only when there is co-operation between states on a basis of mutual respect, free from political or security-based encroachment. The European Court of Human Rights has ruled on several cases where extradition or deportation was not consistent with fundamental rights, thereby highlighting the contradiction between the state's interests and the protection of human rights.<sup>29</sup> Disguised or indirect extradition occurs when a person comes under the authority of a foreign state without formal extradition proceedings taking place. Although they are not prohibited by international law,<sup>30</sup> they are done without abduction or collusion by agents of states.<sup>31</sup> Instead, they involve the use of immigration law, such as denial of a visa, expulsion, or deportation, to circumvent extradition procedures and allow a different state to take control of a subject.<sup>32</sup> By making that option, a

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<sup>24</sup> Joanna Harrington, "Extradition of Transnational Criminals," in *Routledge Handbook of Transnational Criminal Law*, ed. Neil Boister and Robert J. Currie (London: Routledge, 2014), 14, <https://doi.org/10.4324/9780203380277>.

<sup>25</sup> Sanzhuan Guo, "A Critical Review of Chinese Law on (Mass) Expulsion of Aliens through a Lens of International Law," *Griffith Law Review*, March 27, 2025, 1–25, <https://doi.org/10.1080/10383441.2025.2477950>.

<sup>26</sup> Paul Atagamen Aidonojie, Oluwaseye Oluwayomi Ikubanni, and Alade Adeniyi Oyebade, "Legality of EndSARS Protest: A Quest for Democracy in Nigeria," *Journal of Human Rights, Culture and Legal System* 2, no. 3 (November 20, 2022): 209–24, <https://doi.org/10.53955/jhcls.v2i3.40>.

<sup>27</sup> Neil Boister, "A History of Double Criminality in Extradition," *Journal of the History of International Law / Revue d'histoire Du Droit International* 25, no. 2 (June 16, 2023): 218–57, <https://doi.org/10.1163/15718050-bja10089>.

<sup>28</sup> Courtney Martin, "Treaty-Based Regulation and Evidence-Extradition Agreements as Critical Tools in the Fight against International Criminal Wrongdoing," *International Criminal Law Review* 22, no. 5–6 (September 27, 2021): 1168–87, <https://doi.org/10.1163/15718123-bja10085>.

<sup>29</sup> Zeynab Kiani and Zeynab Purkhaghan, "Deportation and Extradition from an International Perspective," *Journal of Politics and Law* 10, no. 1 (December 29, 2016): 197, <https://doi.org/10.5539/jpl.v10n1p197>.

<sup>30</sup> P. A. Aidonojie, S. A. Wakili, and D. Ayuba, "Effectiveness of the Administration of Justice in Nigeria Under the Development of Digital Technologies," *Journal of Digital Technologies and Law* 1, no. 4 (December 15, 2023): 1105–31, <https://doi.org/10.21202/jdtl.2023.48>.

<sup>31</sup> Miguel Lemos and Miguel João Costa, "The Extradition Bill of Hong Kong Revisited, the National Security Law and the Irony of Human Rights Protection in 'One Country, Two Systems,'" *Revista Brasileira de Direito Processual Penal* 8, no. 3 (October 29, 2022), <https://doi.org/10.22197/rbdpp.v8i3.701>.

<sup>32</sup> Lawrence Oyelade Oyeniran, "An Appraisal of Contemporary Issues in Trade Disputes Resolution in Nigeria," *KIU Law Journal* 6, no. 1 (2024): 166–89, <https://kiulj.kiu.ac.ug/article-view.php?i=114&t=an-appraisal-of-contemporary-issues-in-trade-disputes-resolution-in-nigeria>.

state can leverage its internal immigration authority to get a person to move to a petitioning state under the cover of lawful deportation.<sup>33</sup>

While national laws and treaties govern legal extradition, clandestine extradition is a secondary option typically employed when a legal warrant is unavailable.<sup>34</sup> A state thereon uses powers applied for other purposes—e.g., deportation—to hand over an individual to a demanding state.<sup>35</sup> As seen with cases like *The Soblen Case*,<sup>36</sup> measures, although constitutionally legal at the domestic level, become suspicious both legally and ethically at the international level.<sup>37</sup> Governments, on occasion, employ alternatives to traditional extradition, such as abusive seizures and irregular renditions.<sup>38</sup> They belong to three broad categories: cross-border kidnapping or abduction by foreign agents, unprocessed or informal transfers by state agents, and manipulative application of immigration legislation to effect seizure by another state.<sup>39</sup> These actions not only subvert the rule of law and rights of people but also risk destabilising international diplomatic ties and eroding trust in legal mechanisms that exist to prevent abusive state action.<sup>40</sup>

International and Nigerian human rights law provide the foundation for extradition, deportation, or rendition cases. Chapter IV of the Constitution of the Federal Republic of Nigeria, 1999 (as amended), covers the right to life, the right to freedom of movement, the right to be heard fairly, and the right not to be tortured or subjected to cruel, inhuman, or degrading treatment, among others. Nigeria is also a State party to other core international human rights treaties such as International Covenant on Civil and Political Rights (ICCPR) and the African Charter on Human and Peoples' Rights (ACHPR). They provide that no fugitive will be extradited or

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<sup>33</sup> Paul O'Higgins, "Disguised Extradition: The Soblen Case 1," *The Modern Law Review* 27, no. 5 (September 18, 1964): 521–39, <https://doi.org/10.1111/j.1468-2230.1964.tb02240.x>.

<sup>34</sup> Simon Ejokema Imoisi and Paul Atagamen Aidonojie, "Legal and Socio-Economic Issues Concerning Black Marketer's Activities of Petroleum Products in Nigeria," *Yuridika* 38, no. 2 (May 1, 2023): 261–84, <https://doi.org/10.20473/ydk.v38i2.44999>.

<sup>35</sup> Nicholas R Micinski, "Threats, Deportability and Aid: The Politics of Refugee Rentier States and Regional Stability," *Security Dialogue* 54, no. 6 (December 26, 2023): 529–47, <https://doi.org/10.1177/09670106211027464>.

<sup>36</sup> J. Duncan M. Derrett, "Emergency and Preventive Detention in India: A Question as to the Courts' Proper Function," in *Rule, Protest, Identity* (London: Routledge, 2023), 83–119, <https://doi.org/10.4324/9781032618029-5>.

<sup>37</sup> Yordan Gunawan, Amarta Yasyhini Ilka Haque, and Paul Atagamen Aidonojie, "Police Brutality as Human Rights Violation: A Study Case of Black Lives Matter," *Varia Justicia* 19, no. 1 (April 29, 2023): 19–32, <https://doi.org/10.31603/variajusticia.v19i1.6588>.

<sup>38</sup> Momodu Kassim-Momodu, "Extradition of Fugitives by Nigeria," *International and Comparative Law Quarterly* 35, no. 3 (July 17, 1986): 512–30, <https://doi.org/10.1093/iclqaj/35.3.512>.

<sup>39</sup> Enebeli, "A Scholarly Examination of Extradition Law in Nigeria and Its Implications within the Framework of International Law."

<sup>40</sup> Mukhlis et al., "Rejection of Former Shia Community in Sampang Perspective on Human Rights Law: Discourse of Religious Rights and Freedom in Indonesia," *Lex Scientia Law Review* 7, no. 2 (2023): 237, <https://doi.org/https://doi.org/10.15294/lesrev.v7i2.72156>.

deported where his or her right to a fair trial, and against real risk of harm or ill treatment are at stake.<sup>41</sup>

The theoretical underpinnings of this debate rest on three central doctrines: the rule of law, due process, and state sovereignty. The rule of law requires all acts of states, including those related to national security and international cooperation, to be confined within the bounds of established legal norms and judicial processes. It requires governments to be answerable and open about their behaviour, particularly where it affects fundamental freedoms.<sup>42</sup> Due process is a fundamental principle that assures fair handling through the judicial process, including being heard, being represented by counsel, and the right to appeal actions affecting one's freedom. Due process is a protection against the arbitrary use of power.<sup>43</sup> State sovereignty, emphasising states' prerogatives over domestic affairs and territory, must be balanced against the need to observe international duties and human rights measures.<sup>44</sup> Misusing sovereignty for legitimisation for covert operations or extralegal expulsions, apart from further eroding human rights, also saps away global confidence and cooperation.

The legal and conceptual pillars of extradition, deportation, and human rights reflect a precarious equilibrium between legitimate state concerns and the protection of individual human rights. Indeed, states are free to provide for national security and public order, yet they must do so within the domestic and international norms of law. Covert extradition and unlawful deportation, by definition, disrupt such a balance and are heinous violations of human dignity, the rule of law, and international human rights obligations of Nigeria.

### **Legal Framework Governing Extradition and Deportation in Nigeria**

The legal framework governing extradition and deportation in Nigeria comprises national, regional, and international instruments, which, when interpreted together, define the parameters, including applicability, processes, and safeguards, surrounding removal from or to Nigerian territory.<sup>45</sup> The Extradition Act, at the national level, is the statute that prescribes the formal mode of surrendering or extraditing offenders to requesting states. The Act very clearly provides that

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<sup>41</sup> Mukhlis et al.

<sup>42</sup> Mahnaz Mansoor, "Citizens' Trust in Government as a Function of Good Governance and Government Agency's Provision of Quality Information on Social Media during COVID-19," *Government Information Quarterly* 38, no. 4 (October 2021): 101597, <https://doi.org/10.1016/j.giq.2021.101597>.

<sup>43</sup> Serena Forlati, "Due Process and Protection of the Parties' Rights," in *Research Handbook on International Procedural Law* (United Kingdom: Edward Elgar Publishing, 2024), 374–92, <https://doi.org/10.4337/9781788970792.00031>.

<sup>44</sup> Ricardo Lillo Lobos, "Modern Conceptions of Procedural Due Process and the Right to a Fair Trial in Civil Matters," in *Understanding Due Process in Non-Criminal Matters* (Cham: Springer, 2022), 205–33, [https://doi.org/10.1007/978-3-030-95534-2\\_11](https://doi.org/10.1007/978-3-030-95534-2_11).

<sup>45</sup> Chike Okosa, "Extraordinary Renditions: Nigeria Finally Joins the Elite League," *SSRN Electronic Journal*, 2021, 108–19, <https://doi.org/10.2139/ssrn.3967130>.

extradition may only take place based on a treaty or an exchange, it has to be subject to judicial review and ministerial approval (generally, the Attorney-General of the Federation).<sup>46</sup> The Act further contains protections against extradition in the situation where the offence is political, a case of double jeopardy or where the alleged offender is likely to be faced with the real possibility of torture, persecution and death in the source state. This is by the constitutional provisions of the 1999 Constitution (as amended) of the Federal Republic of Nigeria, particularly under Chapter IV, which prohibits treatment that is incompatible with human dignity. The above constitutional provisions are used as a yardstick to determine the propriety of extradition or deportation in Nigeria.<sup>47</sup>

Apart from the national matrix, regional human rights instruments have a lot of impact in Nigeria on how extradition and deportations are undertaken. Primarily among them is the African Charter on Human and Peoples' Rights (ACHPR), which Nigeria has incorporated into the Act titled African Charter on Human and Peoples' Rights (Ratification and Enforcement).<sup>48</sup> The Charter aims to restate the freedom and fair trial provisions while providing states with at least a floor of individual protection from unlawful arrest, detention and removal. The African Charter is as much a part of Nigerian law. Therefore, it is often cited by local courts to void executive abuses of immigration or extradition provisions, as it is a domestic act. Intra-national treaties that bolster the law of deportation and extradition, International in scope but enshrined in Nigerian law. With a normative and an ethical standard that cannot be enforced through law, the UDHR is one yardstick through which states' behaviour can be assessed. The UDHR, for example, provides rights such as the right to seek asylum,<sup>49</sup> the right to remain free from arbitrary arrest and exile, as well as the right to a fair trial.<sup>50</sup> The International Covenant on Civil and Political Rights (ICCPR), being a treaty-based and applicable to Nigeria, outlines these principles in more detail to ensure enforceability. Many of the provisions of the International Covenant on Civil and Political Rights (ICCPR), particularly

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<sup>46</sup> Lucas Nduka Oluka, C. Ailende Ativie, and Okwanuzor Mwaamaka Okuguni, "The New World Order, Human Rights and Extradition Laws in Africa: Impacts and Prospects," *Journal of Law, Policy and Globalization* 82 (February 2019): 103–14, <https://doi.org/10.7176/JLPG/82-14>.

<sup>47</sup> Ernest K. Bankas, "The ICC and the Immunity Question," in *The State Immunity Controversy in International Law* (Berlin, Heidelberg: Springer Berlin Heidelberg, 2022), 613–43, [https://doi.org/10.1007/978-3-662-64043-2\\_18](https://doi.org/10.1007/978-3-662-64043-2_18).

<sup>48</sup> Eghosa Osa Ekhaton, "The Impact of the African Charter on Human and Peoples' Rights on Domestic Law: A Case Study of Nigeria," *Commonwealth Law Bulletin* 41, no. 2 (April 3, 2015): 253–70, <https://doi.org/10.1080/03050718.2015.1049633>.

<sup>49</sup> Hans Gammeltoft-Hansen and Thomas Gammeltoft-Hansen, "The Right to Seek – Revisited. On the UN Human Rights Declaration Article 14 and Access to Asylum Procedures in the EU," *European Journal of Migration and Law* 10, no. 4 (2008): 439–59, <https://doi.org/10.1163/157181608X380219>.

<sup>50</sup> Salvatore Fabio Nicolosi, "Re-Conceptualizing the Right to Seek and Obtain Asylum in International Law," *International Human Rights Law Review* 4, no. 2 (November 13, 2015): 303–32, <https://doi.org/10.1163/22131035-00402005>.

Articles 9, 13, and 14, underscore the requirement of legality, procedures subject to an objective test, and judicial control over any process involving imprisonment/expulsion, or surrender. Under the ICCPR, a deportation or extradition must be carried out in accordance with law, through a process related to an objective, and provide the concerned party with a fair hearing before a competent organ of the state offering such relief. To say that, as a signatory to these treaties and therefore under an international obligation to implement them faithfully, does wonders for the courts now conceding ground in human rights cases.<sup>51</sup>

The legal boundaries of extradition and deportation have been defined through judicial interpretation in Nigeria. Courts have consistently held that, following the rule of constitutional primacy and the demands of due process, no individual is extradited or deported unless so satisfied.<sup>52</sup> The Court of Appeal in the case of *George Udezor v. F.R.N* has ordered that extradition should be governed by the provisions of the Extradition Act and that it is for the Attorney-General alone, acting judicially, to give such requests. Similarly, courts have found that it violates constitutional rights to deport an individual, especially a citizen or legal resident, without a proper legal process. The stance of the judiciary supports an official intent by the state to enforce domestic law together with international obligations stipulated through human rights treaty instruments.<sup>53</sup> In general, Nigeria has a robust legal infrastructure for extradition and deportation, derived from domestic law, regional charters, and international treaties, with a constitutional underpinning of fundamental rights. The real problem, though, is one of non-consistent enforcement and judicial oversight over abuse, particularly politically motivated or covert extraditions/deportations.<sup>54</sup>

### **Extradition (Rendition) Cases in Nigeria**

The ascendancy of extradition matters in Nigeria as a consequence of the evolving legal system, as well as proliferating international obligations, with all due respect to Nigeria as a strategic geopolitical power.<sup>55</sup> Sectional analysis of Extradition and Rendition cases in Nigeria, at large, vis-à-vis the strain on fabricated Litigation

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<sup>51</sup> Stefan Heuser, “Is There a Right to Have Rights? The Case of the Right of Asylum,” *Ethical Theory and Moral Practice* 11, no. 1 (February 5, 2008): 3–13, <https://doi.org/10.1007/s10677-007-9079-1>.

<sup>52</sup> Ananya Chakraborty, “Extradition: Emerging Issues, Challenges and Cases,” in *Extradition Laws in the International and Indian Regime* (Singapore: Springer Singapore, 2019), 181–228, [https://doi.org/10.1007/978-981-13-6397-9\\_5](https://doi.org/10.1007/978-981-13-6397-9_5).

<sup>53</sup> Muiyiwa Adigun, “The Implementation of the African Charter on Human and Peoples’ Rights and the Convention on the Rights of the Child in Nigeria: The Creation of Irresponsible Parents and Dutiful Children?,” *The Journal of Legal Pluralism and Unofficial Law* 51, no. 3 (September 2, 2019): 320–49, <https://doi.org/10.1080/07329113.2019.1675988>.

<sup>54</sup> Godswill Owoche Antai et al., “Balancing National Security and Human Rights: A Critical Analysis of Nigeria’s Anti-Terrorism Laws,” *NIU Journal of Social Sciences* 11, no. 1 (March 31, 2025): 287–99, <https://doi.org/10.58709/niujss.v11i1.2148>.

<sup>55</sup> Temitayo Bello, “Legal Stencil on Extradition Law in Nigeria: An Evaluation,” *SSRN Electronic Journal*, 2017, <https://doi.org/10.2139/ssrn.2970989>.

(laws) and procedures, as well as the influence of political campaigning, and serious human rights violations under bilateral/multilateral extradition treaties. Another part evaluates the circumstances of these cases as being indicative of the larger problems and solutions in international legal co-operation in Africa.

1) *Umaru Dikko Case*

Extradition and wrongful deportation are large-scale, flagrant denials of due process, state sovereignty, and protection of the fundamental human rights of any suspect. In reality, "operations" are usually carried out without proper judicial or administrative procedure, to leave no legal shield for what would otherwise be arbitrary, secret and law-blind acts. Operations like this are certainly not a new thing for Nigeria, which has extensive experience with such invasions. The Umaru Dikko Affair, as it were became an easy target for a clumsy foiled plot to extradite him covertly into Nigerian in 1984, Umaru Dikko, a former Nigerian Minister had been an exile from Nigerian in the United Kingdom, Dikko was drugged, stuffed into diplomatic baggage hold shipping container and was about to be air lifted back to Nigeria. The British border officials, on intelligence, foiled the aircraft. The aborted abduction, aside from embarrassing the Nigerian Government, also led to a diplomatic stand-off between Nigeria and Britain and both countries sent their respective ambassadors back.<sup>56</sup> A vivid example of covert extradition as it goes against not just international law but also bilateral relations and human rights.

2) *Nnamdi Kanu Case*

A founder and activist of the Indigenous People of Biafra, which he had started in 2012. Mr. Kanu was arrested at Jomo Kenyatta International Airport within Nairobi by Kenya security agents on the 19th of June 2021, a time when he was legal to be in Kenya. Subsequently, Mr. Kanu was led to some unknown and undisclosed location that was not a police station nor any of the usual Kenyan centers for detention. Around the 29<sup>th</sup> of June 2021, Kanu was forcibly transferred to Nigeria without legal process or hearing in Kenya.<sup>57</sup> No legal representation was provided to him, and no access to extradition proceedings was provided. Despite that, Nigeria's Attorney General declared that the detention and removal of Kanu became possible with the assistance of Nigerian security agents and Interpol.<sup>58</sup> He was arrested at the Department of State Services' headquarters on arrival at Abuja. The

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<sup>56</sup> David U. Enweremadu, "Nigeria's Quest to Recover Looted Assets: The Abacha Affair," *Africa Spectrum* 48, no. 2 (August 1, 2013): 51–70, <https://doi.org/10.1177/000203971304800203>.

<sup>57</sup> Albert Gordon Omulo, "Towards an Assessment of the Legacy of Kenya's Uhuru Kenyatta: Pan-Africanist or Subtle Western Lackey?," *Cogent Social Sciences* 9, no. 1 (December 31, 2023): 1–36, <https://doi.org/10.1080/23311886.2023.2221970>.

<sup>58</sup> Aaron Fichtelberg, "Leading Cases of the Hybrid Courts," in *Hybrid Tribunals* (New York, NY: Springer New York, 2015), 113–75, [https://doi.org/10.1007/978-1-4614-6639-0\\_4](https://doi.org/10.1007/978-1-4614-6639-0_4).

Nigerian authorities charged him with four offences, which include conspiracy to commit treasonable felony, defamation, and illegal importation of goods.<sup>59</sup>

Most important is the clarification that Kanu's extradition to Nigeria is not an extradition according to international law, especially since there is no extradition treaty between Kenya and Nigeria.<sup>60</sup> The question which then arises is whether the offences for which Kanu was sought are covered by the class of political offences that are not normally extraditable? For that reason, legal precedents on political offences need to be analysed. The definition of "offence of a political character" was discussed by the court in the case of *Re Castioni*,<sup>61</sup> where the defendant had attacked a government official by way of gunfire while engaging in a political rebellion due to public discontent on the part of the population against the government for not holding a constitutional referendum. The act being violent, the court held that it was politically motivated and thus a political offence, which renders extradition impossible. The court went on to add that not all offenses perpetrated within political disturbances are of a political character, only those which demonstrate the purpose and intent of a political movement. Section 3(1) of the Nigerian Extradition Act states the same fact, where it provided that a fugitive is not to be surrendered if the crime is politically inclined. Unluckily, the Act also does not define the term "politically inclined" to any meaningful extent, and for that reason, it is open to several interpretations and potential misuse. This is not specific to Nigeria only; other countries like the UK, Ghana, and Colombia have the same issue in their legislations as well.<sup>62</sup>

One other example is *Re Meunier*. Meunier had bombed an army barrack and café and had stated that they were political offenses, but the court refused so to find on the basis that a political offence requires the intervention of groups within a state that are competing for control of a government.<sup>63</sup> The court went on to cite that attacks on the state's property where there is no political element are not political offenses. Going back to the case of Kanu, his forced return to Nigeria is questionable under international law, Kenya law, and Nigeria law. International law, e.g., the UN

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<sup>59</sup> Ugochukwu Charles Kanu, Don Onuora Okanyi, and Leonard Ibekwe Ugwu, "Scrutinizing the Constitutionality of Remand Order Proceedings under the Administration of Criminal Justice Legislations in Nigeria: A Comparative Analysis," *Beijing Law Review* 13, no. 04 (2022): 1030–50, <https://doi.org/10.4236/blr.2022.134065>.

<sup>60</sup> Chakraborty, "Extradition: Emerging Issues, Challenges and Cases."

<sup>61</sup> Paul Arnell and Clive Walker, "The Resurrection of the Political Offence Exception to Extradition in UK Law," *New Journal of European Criminal Law* 15, no. 4 (December 4, 2024): 412–31, <https://doi.org/10.1177/20322844241290613>.

<sup>62</sup> Harmen van der Wilt, *The Law and Practice of Extradition* (London: Routledge, 2022), <https://doi.org/10.4324/9780429956683>.

<sup>63</sup> Chris Millington, "Getting Away with Murder: Political Violence on Trial in Interwar France," *European History Quarterly* 48, no. 2 (April 10, 2018): 256–82, <https://doi.org/10.1177/0265691418754474>.

Charter and the Declaration on Friendly Relations,<sup>64</sup> explicitly prohibits interference with the internal affairs of sovereign states free from interference. The London Scheme for Extradition within the Commonwealth also makes provision for extradition, e.g., Article 12, which prohibits extradition for political offenses.<sup>65</sup> Article 12(1)(a) and (c) states that where the requested offence is political, the individual shall not be extradited, and where a competent authority certifies that the offence is of a political character, it is binding on the judicial authorities.<sup>66</sup> Political crimes fall into two types: "pure" political crimes such as treason and sedition, and "relative" political crimes — ordinary crimes committed within the context of political controversy.<sup>67</sup> Nnamdi Kanu's rendition appears to be a violation of established legal principles across the three legal traditions of international, Kenyan, and Nigerian law. The correct legal processes did not appear to have occurred, and it is not an impression that he was brought back to Nigeria using a legal extradition but an illegal action most likely done by Nigeria's Department of State Services (DSS). A Kenyan High Court sitting in Nairobi has condemned the Kenyan government over the 2021's abduction and illegal extradition of Nnamdi Kanu, the leader of the Indigenous People of Biafra, (IPOB) to Nigeria. Justice Mwita ruled on June 24, 2025 that Kenyan authorities, including top security officials, were complicit in the operation and it was a complete violation of Kenya's domestic law as well as international laws.<sup>68</sup> Kanu, a lawful guest in Kenya, was unlawfully seized, tortured and transferred without due process. The court dismissed the government's denials, and awarded Kanu Kshs 10 million (₦119.5 million) in damages, noting the state's responsibility to respect human rights and ensure accountability.<sup>69</sup>

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<sup>64</sup> Khaled S. Al-Rashidi and Clive Walker, "Extradition between Kuwait and the UK: New Dispositions, Old Doubts," *International Journal of Law, Crime and Justice* 66 (September 2021): 100485, <https://doi.org/10.1016/j.ijlcj.2021.100485>.

<sup>65</sup> Peter J Wertheim, "Should 'Grave Crimes of International Terrorism' Be Included in the Jurisdiction of the International Criminal Court?," *Policy and Society* 22, no. 2 (January 1, 2003): 1–21, [https://doi.org/10.1016/S1449-4035\(03\)70017-4](https://doi.org/10.1016/S1449-4035(03)70017-4).

<sup>66</sup> Danielle Ireland-Piper, "Extraterritoriality in the Commonwealth: Case Studies from Australia, New Zealand and the United Kingdom," in *Research Handbook on Extraterritoriality in International Law* (Cheltenham: Edward Elgar Publishing, 2023), 146–63, <https://doi.org/10.4337/9781800885592.00017>.

<sup>67</sup> Nicholas N. Kittrie, "Reconciling the Irreconcilable: The Quest for International Agreement over Political Crime and Terrorism," in *The Year Book of World Affairs 1978* (London: Routledge, 2019), 208–36, <https://doi.org/10.4324/9780367274634-13>.

<sup>68</sup> Weje Ibuchim Nnorom, "Is Capital Punishment a Probable Hotspot for Refugee Fright and Flight? A Back and Forth Right to Life Grapple," *SSRN Electronic Journal*, 2021, <https://doi.org/10.2139/ssrn.3992792>.

<sup>69</sup> Michael I. Ugwueze, "Nigerian Government and the Neo-Biafra Activism: Understanding the Danger of Kinetic Approach to (Non)Violent Social Movements," *African Identities*, May 19, 2025, 1–21, <https://doi.org/10.1080/14725843.2025.2507773>.

### 3) *Sunday Igboho Case*

In the case of Sunday Adeyemo, also called Sunday Igboho, Nigeria had requested for the extradition of Igboho from the Republic of Benin based on the 1984 Extradition Treaty with the Republic of Benin. This is not likely to succeed based on the extradition treaty, which excludes political offences from its application.<sup>70</sup> Igboho engaged in activism to promote the creation of a Yoruba nation state.<sup>71</sup> The basic question of law, however, is whether or not the methods he is using qualify as acts of terrorism as claimed by the Nigerian Government. A right of self-determination is enshrined under international law, with the United Nations Declaration on Human Rights (UNDHR) being particularly so stressed. Worth recalling also is that under the London Scheme for Extradition within the Commonwealth as well as under the 1984 Extradition Treaty with Nigeria, Benin, Togo, and Ghana, political offenses are not grounds for extradition.<sup>72</sup>

### 4) *Senator Buruji Kashamu Extradition Saga*

Mr. Kashamu was arrested on arrival at London, United Kingdom, on December 1998 by Metropolitan Police officers on charges of drug trafficking. This follows a previous indictment issued seven months earlier by the authorities of the United States where he is accused of orchestrating a network which trafficks heroin. After his arrest and incarceration at a UK prison, the Department of Justice Office of International Affairs of the U.S. initiated extradition proceedings under which he was to be brought to the United States.<sup>73</sup> The U.S., in February 1999, made a formal requisition for extradition. By the time of May 2000, evidence had already been adduced by Mr. Kashamu that he had collaborated with law enforcement officers of Benin, Togo, and Nigeria. His defense had largely rested on two averments: that he had acted for the Nigerian Drug Law Enforcement Agency as an informant and had disclosed that it was not he himself but his brother who traffics drugs.<sup>74</sup> Of especial relevance, in 2015, the NDLEA itself attempted to extradite Kashamu to the U.S. on charges of drug trafficking, but was halted by an injunction from the Federal High Court at Abuja. Although the case is somewhat outside the traditional purview

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<sup>70</sup> Yinka Olomajobi and Taiwo Abiodun-Oni, "Human Rights in Crises: Human Rights in Crises: A Comparative Study Between the Question of Self Determination of Biafra And Oduduwa Republics," *International Journal on Minority and Group Rights* 30, no. 4 (February 22, 2023): 563–87, <https://doi.org/10.1163/15718115-bja10104>.

<sup>71</sup> John Sunday Ojo, "Transforming Pacifists into Warmongers? Separatist Movement, State Repression, and the Politics of Framing Terrorism in Nigeria: Evidence from IPOB and Yoruba Nation's Freedom Frontiers," *Journal of Applied Security Research* 19, no. 3 (July 2, 2024): 377–412, <https://doi.org/10.1080/19361610.2023.2189867>.

<sup>72</sup> Hairat Balogun, "The Repatriation of Embezzled State Funds," in *Corruption, Integrity and Law Enforcement* (Leiden, The Netherlands: Brill | Nijhoff, 2000), 423–34, [https://doi.org/10.1163/9789004481213\\_029](https://doi.org/10.1163/9789004481213_029).

<sup>73</sup> Stephen Magu, "Kenya's Foreign Policy Issues and Scandals," in *A Contemporary Analysis of Kenya's Foreign Policy* (Cham: Springer Nature Switzerland, 2024), 283–313, [https://doi.org/10.1007/978-3-031-67344-3\\_10](https://doi.org/10.1007/978-3-031-67344-3_10).

<sup>74</sup> Stephen Magu, *A Contemporary Analysis of Kenya's Foreign Policy* (Cham: Springer Nature Switzerland, 2024), <https://doi.org/10.1007/978-3-031-67344-3>.

of international crimes, it is put forth here as evidence that a strict definition of international crimes should be broadened and expanded to cover serious cross-national offences like drug trafficking.

##### 5) *Abba Kyari's Case*

Ramon Abbas, also known as "Hushpuppi," was charged with orchestrating a series of cybercrime schemes.<sup>75</sup> Federal prosecutors within the U.S. Department of Justice based their July 25, 2021, complaint on charges that he laundered hundreds of millions of dollars in proceeds from Business Email Compromise (BEC) schemes, which affected an estimated 1.9 million victims primarily through Business Email Compromise schemes.<sup>76</sup> Hackers typically infiltrate the email system of a company to break BEC, these attacks which include email communications, email spoofing or interception of emails supposedly from employees to induce the victim to wire money by masquerading as an employee - Hushpuppi and others pleaded guilty to a litany of offenses, including stealing about \$922,857 from U.S.-based law firm in October 2019 as part of a broader fraud scheme that bilked a foreign bank nearly \$14.7 million and attempted to defraud would-be victim English soccer club of £100 million (about \$124M). He was also detained, incidentally, in an elaborate cyber scam where a Qatari business magnate was swindled out of approximately USD 1.1 million. His co-schemers were Abdulrahman Jumma (Abdul), Vincent Kelly Chibuzor (Kelly), Rukayat Motunrayo Fashola (Morayo), and Bolatito Tawakalitu Agbabiaka (Bolamide), who were also apprehended.<sup>77</sup>

Although Deputy Commissioner of Police Abba Kyari did not actively participate in the fraud, evidence shows that he has benefited from Hushpuppi and carried out illicit acts for him by arresting and imprisoning a disgruntled co-conspirator, Vincent Kelly Chibuzo.<sup>78</sup> Messages between Hushpuppi and Kyari, the screenshots of which were submitted as evidence, show that Hushpuppi had offered to compensate Kyari and his team for arresting and torturing Chibuzo, who is reported to have readily cooperated and is alleged to have received the promised payment. An investigative report by Peoples Gazette also showed that Kyari had traveled to Dubai at Hushpuppi's request, where he was hospitably entertained with

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<sup>75</sup> Divine Fuh, "Chihuahua Promises and the Notorious Economy of Fake Pets in Cameroon," *Journal of African Cultural Studies* 33, no. 3 (July 3, 2021): 387–403, <https://doi.org/10.1080/13696815.2021.1949967>.

<sup>76</sup> Temple Uwalaka, "'Abba Kyari Did Not Die of Coronavirus': Social Media and Fake News during a Global Pandemic in Nigeria," *Media International Australia* 188, no. 1 (August 13, 2023): 18–33, <https://doi.org/10.1177/1329878X221101216>.

<sup>77</sup> Newman U. Richards and Felix E. Eboibi, "Cybercrime Perspectives to the 'ENDSARS' Protest in Nigeria," *African Security Review* 32, no. 1 (January 2, 2023): 38–56, <https://doi.org/10.1080/10246029.2022.2141128>.

<sup>78</sup> Robinson Tombari Sibe and Christian Kaunert, "Research Findings—Cybercrime Composition, Frequency, and Complexity in Nigeria: From a Law Enforcement Perspective," in *Cybercrime, Digital Forensic Readiness, and Financial Crime Investigation in Nigeria* (Cham: Springer, 2024), 129–47, [https://doi.org/10.1007/978-3-031-54089-9\\_6](https://doi.org/10.1007/978-3-031-54089-9_6).

top-grade accommodation, a tour of the city, and airport drop-off and pick-up. Subsequently, the United States Federal Bureau of Investigation issued an international arrest warrant for Kyari and requested his extradition, so that he could be tried in the United States.<sup>79</sup>

Nigeria's Extradition Act regulated the extradition of Kyari.<sup>80</sup> It is provided under section 1 of the Act that the Act may be applied to any state with which Nigeria has entered into a treaty of extradition by a statutory Order made under the Federal Gazette. The application was made in conformity with the terms of the treaty. Section 2 of the Act provides that the Act applies to all the countries within the Commonwealth as well.<sup>81</sup> Additionally, Nigeria is a party to a bilateral extradition agreement with the United States, which was initially entered into with the United Kingdom on 22 December 1931, on behalf of its territories.<sup>82</sup> among them being the then Nigeria Protectorate. Article 16 of the agreement provides for its application to Nigeria, and Nigerian law, including the 1966 Extradition Act, the Extradition (Modification) Order 2014, and the Extradition (Proceedings) Rules 2015, incorporates its provisions.<sup>83</sup>

According to Article 1 of the agreement, the two countries obligated themselves to extradite individuals charged or convicted within the territory of the other party for a crime. Article 3 specifies extraditable offences, which comprise those listed in List 18, including obtaining money or other property fraudulently and knowingly receiving goods that have been stolen.<sup>84</sup> The agreement further stated that the offence be made a crime under the laws of each of the two states for extradition. Acts of bribery with a public officer or by a public officer are defined as offences under numerous legislations in Nigeria.<sup>85</sup> Article 9 provides that an extradition

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<sup>79</sup> Omololu Fagbadebo and Loke Oluwalogbon, "Conflict, Police Impunity and the Governance Question in Nigeria: Reflecting on the #EndSARS Protest," in *Contemporary Issues on Governance, Conflict and Security in Africa* (Cham: Springer Nature Switzerland, 2023), 69–89, [https://doi.org/10.1007/978-3-031-29635-2\\_5](https://doi.org/10.1007/978-3-031-29635-2_5).

<sup>80</sup> Ngboawaji Daniel Nte, Brebina Kelvin Enoke, and Joda Adekunbi Omolara, "The Challenges and Prospects of Enforcement of Nigeria's Counter-Terrorism/Insurgency Laws and Policies: Implications for National Security," *The Indonesian Journal of International Clinical Legal Education* 4, no. 2 (June 30, 2022), <https://doi.org/10.15294/ijicle.v4i2.56483>.

<sup>81</sup> Jamie Rowen, "War Crimes Tribunals, Crimes against Humanity and Transitional Justice," in *International Encyclopedia of the Social & Behavioral Sciences* (Amsterdam: Elsevier, 2015), 382–88, <https://doi.org/10.1016/B978-0-08-097086-8.86119-X>.

<sup>82</sup> Victoria Ojo-Adewuyi, *Criminal Justice Responses to the Boko Haram Crisis in Nigeria*, vol. 34, International Criminal Justice Series (The Hague: T.M.C. Asser Press, 2024), <https://doi.org/10.1007/978-94-6265-615-4>.

<sup>83</sup> Tom Obokata, "The Value of International Law in Combating Transnational Organized Crime in the Asia-Pacific," *Asian Journal of International Law* 7, no. 1 (January 29, 2017): 39–60, <https://doi.org/10.1017/S2044251315000193>.

<sup>84</sup> Enebeli, "A Scholarly Examination of Extradition Law in Nigeria and Its Implications within the Framework of International Law."

<sup>85</sup> Muyiwa Adigun, "The Status of Customary International Law under the Nigerian Legal System," *Commonwealth Law Bulletin* 45, no. 1 (January 2, 2019): 115–56, <https://doi.org/10.1080/03050718.2019.1677484>.

request must be supported by sufficient evidence. If the evidence is not provided within two months after a suspected individual is apprehended,<sup>86</sup> Article 11 provides for their release.

However, the Federal High Court of Nigeria refused the application of the Federal Government to extradite Abba Kyari to America.<sup>87</sup> Justice Inyang Ekwo ruled that the application, brought by the Office of the Attorney-General of the Federation, has no substance and is faulty in law. The judge added that the Attorney-General should have realized that the Extradition Act forbids the extradition of a citizen who is already standing trial in Nigeria for an offence committed. Ironically, it was the same Attorney-General who had authorised the National Drug Law Enforcement Agency (NDLEA) to prosecute Kyari for drug charges. Justice Ekwo held that Kyari cannot be extradited until the trial in Nigeria is over, either on acquittal or conviction.<sup>88</sup> For this reason, the court dismissed the application as incompetent under Section 3(f) of the Extradition Act, which prohibits the extradition of individuals who are on trial in Nigeria for other crimes.<sup>89</sup> While the discretion of the Attorney-General to accept or deny extradition is usually respected, discretion is limited by Section 3 of the Act. Among other limitations, extradition is precluded for a political offence or where requested in bad faith or on grounds of race, religion, or nationality. Also, when a suspected offender is already charged within Nigeria, extradition is suspended pending the conclusion of such proceedings. An individual could thus only be surrendered for extradition where the request is due to due legal processes and is not inconsistent with the provisions of Section 3. By a series of treaties to which Nigeria is signatory, an offence is required to be extraditable for a valid request.

#### 6) *Florence Onyegbu's Case*

Between 2008 and July 2010, Onyegbu confessed to paying some people \$100 to \$200 a month for their Medicare details, the U.S. Department of Justice said in 2011. Onyegbu used the details to file bogus claims with Medicare for some \$1.8 million for home healthcare services, including skilled nursing, physical therapy, speech-language therapy, and occupational therapy—treatment that the patients did

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<sup>86</sup> Edward Grange, Ben Keith, and Sophia Kerridge, “Extradition under the EU–UK Trade and Cooperation Agreement,” *New Journal of European Criminal Law* 12, no. 2 (June 3, 2021): 213–21, <https://doi.org/10.1177/2032284421995583>.

<sup>87</sup> Adebayo Abidemi Olufemi, “Youth Culture, Grievances and Social Media Revolt for Good Governance in Nigeria: A Critical Evaluation of Selected YouTube Agitation Videos of the Youth,” *Quarterly Review of Film and Video* 41, no. 3 (April 28, 2024): 397–417, <https://doi.org/10.1080/10509208.2022.2127600>.

<sup>88</sup> Babayo Sule, “Party Politics and Internal Crises,” in *Nigerian Political Parties in the Fourth Republic* (Cham: Springer Nature Switzerland, 2024), 215–41, [https://doi.org/10.1007/978-3-031-77110-1\\_7](https://doi.org/10.1007/978-3-031-77110-1_7).

<sup>89</sup> Ifeatu Onyekonwu, “A Discourse on the Legislation Prohibiting Cyber Stalking in Nigeria,” *SSRN Electronic Journal*, 2021, <https://doi.org/10.2139/ssrn.4289439>.

not receive and for which they were not eligible.<sup>90</sup> Over \$1.3 million that Medicare paid De-Promise Home Health Services came from the phoney claims. The EFCC stated that Onyegbu was arrested on February 21, 2022, at her residence in Ojodu, Lagos.<sup>91</sup> During her arrest, a Nigerian national identification card bearing her name, Janet Boi and a State of Texas driver's license bearing her name, Florence Enwerim Onyegbu, were taken from her. On March 22, 2023, she was surrendered to the FBI by an extradition order issued on December 2, 2022, by Justice Z.B. Abubakar of the Federal High Court in Abuja. Onyegbu began her string with the law when she was apprehended on February 12, 2011, within the United States. Onyegbu entered a plea of guilty and was later sentenced to 46 months in prison after she made and solicited illegal compensation for healthcare services. Onyegbu failed to report to prison on April 4, 2011, as required by law. On March 4, 2013, Onyegbu was charged with evading her prison sentence, which is contrary to United States law.<sup>92</sup>

**Table 1.** Summary of discussed Extradition Cases

Case	Location of Arrest	Legal Basis or Violation	Offense(s) Involved	Legal Outcomes	Key Legal Issues
Umaru Dikko Case (1984)	United Kingdom	No formal extradition; diplomatic abduction attempt	Alleged corruption	Foiled abduction led to a diplomatic crisis	Violation of sovereignty, human rights, and due process
Nnamdi Kanu Case (2021)	Kenya-Nigeria	Extraordinary rendition; no extradition treaty	Treasonable felony, defamation, illegal importation	Held in Nigeria; ongoing trial	Rendition not supported by law; political offence exception debated
Sunday Igboho Case (2021)	Republic of Benin	1984 Extradition Treaty (excludes political offences)	Alleged terrorism; political self-determination	Extradition blocked	Political offence exclusion; right to self-determination
Senator Buruji Kashamu Case	UK (arrested); Nigeria (extradition attempt)	Extradition attempt to U.S.; halted by Nigerian court	Drug trafficking	Extradition blocked by court injunction	Claimed mistaken identity; due process within Nigerian courts

<sup>90</sup> Ojeifoh Okosun and Uchenna Ilo, "The Evolution of the Nigerian Prince Scam," *Journal of Financial Crime* 30, no. 6 (December 1, 2023): 1653–63, <https://doi.org/10.1108/JFC-08-2022-0185>.

<sup>91</sup> Tena Prelec and Ricardo Soares de Oliveira, "Enabling African Loots: Tracking the Laundering of Nigerian Kleptocrats' Ill-Gotten Gains in Western Financial Centres," *Journal of International Relations and Development* 26, no. 2 (June 24, 2023): 272–300, <https://doi.org/10.1057/s41268-023-00292-4>.

<sup>92</sup> Umma Aliyu Musa, *Emotions in Muslim Hausa Women's Fiction* (New York: Routledge, 2019). | Series: Global Africa; 13: Routledge, 2019), <https://doi.org/10.4324/9780429020797>.

Case	Location of Arrest	Legal Basis or Violation	Offense(s) Involved	Legal Outcomes	Key Legal Issues
(1998-2015)					
Abba Kyari Case (2021-2022)	Nigeria	U.S. extradition request; a bilateral treaty exists	Bribery, obstruction of justice (related to Hushpuppi fraud)	The Nigerian court denied extradition	Standing trial in Nigeria; extradition precluded under Section 3(f) of the Act
Florence Onyegbu Case (2011-2023)	Nigeria (arrested); U.S. (crime committed )	Extradited under a valid treaty and court order	Medicare fraud (\$1.8M), prison evasion		

*Source: Compiled by the author from several references*

## Human Rights Implications

Covert extradition operations and illegal deportation have far-reaching and intricate consequences for human rights in Nigeria, and particularly because they reflect a glaring disrespect for domestic and international law as well as procedural and substantive rights. They often start with denial of right of fair hearing and right of due process, which are cardinal pillars of justice under Nigerian Constitution and paramount provisions of international human right treaties such as the International Covenant on Civil and Political Rights (ICCPR), without the benefit of a judicial hearing or opportunity to prove whether or not such a person should be extradited.<sup>93</sup> Beyond the rude interruption of the law, it also deprives one of any protection against wrongful prosecution, persecution, or discrimination by the receiving state. Surreptitious extraditions not only breach the basic tenets of fair hearing, but also infringe directly on freedom of movement and personal liberty guaranteed under the Nigerian Constitution.<sup>94</sup> These rights are to make sure, at no time will any human being be detained or curtailed from their movement unless in case they have specific authority and by order of a court. In the majority of reported cases, however, victims of such surreptitious activities are arrested without warrant, detained without communication, or relocated across borders without legal warrant. These are signs

<sup>93</sup> Efrat and Newman, “Defending Core Values: Human Rights and the Extradition of Fugitives.”

<sup>94</sup> Dr. Michael D. Hanson, Dr. Amanim Akpabio, and Amanim Akpabio, “Extradition and State Responsibilities on the Protection of Rights of Requested Persons,” *International Journal of Research and Innovation in Social Science* VII, no. VI (2023): 356–71, <https://doi.org/10.47772/IJRISS.2023.7627>.

of arbitrary arrest and subversion of freedom as a fundamental right, and which, further, put victims at risk of further abuse by the receiving state.<sup>95</sup>

Furthermore, such practices regularly expose individuals to torture, inhuman, or degrading treatment, especially when transfers are conducted under conditions without legal protection.<sup>96</sup> Covert operations can range from drugging right through to physical torture or psychological punishment, for example, the infamous Umaru Dikko Affair, in which a victim was drugged and packed for export by force. They are all a violation of the U.N. Declaration of Human Rights, Article 5 and Article 7 ICCPR, and Section 34 of the Nigerian Constitution<sup>97</sup> which defines torture and inhuman treatment. With such a lack of supervision, legal representation or medical attention, it is a vicious cycle.<sup>98</sup> The human rights abuses also have far greater implications for the international image of Nigeria and foreign policy. The inevitable international condemnation, bilateral relations degradation and image tantamount to a flagrant breach of democracy will be caused by illegal deportations or extrajudicial extraditions.<sup>99</sup> The Umaru Dikko rendition attempt of 1984, captured in the Nigerian-British diplomatic dust-up, is just one example of how Nigeria appears on the global platform. In addition, when Nigeria disregards global legal standards, it rapidly erodes its overall credibility on human rights for Nigerians abroad and its stewardship of international human rights.

In this sense, courts, human rights commissions and civil society have also played a crucial role by questioning such abuse and seeking accountability. The Nigerian Judiciary has already set imperatives for fidelity in strict compliance with the Extradition Act and constitutional guarantees, such as those outlined in the Nigerian Extradition Act. Also, the National Human Rights Commission (NHRC) came up commenting on arbitrary deportations and sensitised people on the rights of detainees and aliens.<sup>100</sup> Civil society actors, including human rights activists and

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<sup>95</sup> Antai et al., “Balancing National Security and Human Rights: A Critical Analysis of Nigeria’s Anti-Terrorism Laws.”

<sup>96</sup> Monique Mann, Ian Warren, and Sally Kennedy, “The Legal Geographies of Transnational Cyber-Prosecutions: Extradition, Human Rights and Forum Shifting,” *Global Crime* 19, no. 2 (April 3, 2018): 107–24, <https://doi.org/10.1080/17440572.2018.1448272>.

<sup>97</sup> Godswill Owoche. Antai et al., “Press Freedom and National Security: The Place of Human Rights in Nigeria’s Cybercrime Laws,” *NIU Journal of Social Science* 11, no. 1 (2025): 301–13, <https://doi.org/https://doi.org/10.58709/niujss.v11i1>.

<sup>98</sup> Asif Efrat and Marcello Tomasina, “Value-Free Extradition? Human Rights and the Dilemma of Surrendering Wanted Persons to China,” *Journal of Human Rights* 17, no. 5 (October 20, 2018): 605–21, <https://doi.org/10.1080/14754835.2018.1533454>.

<sup>99</sup> Godswill Owoche Antai and Paul A. Aidonojie, “An Examination of the Rationale for the Law Against International Crimes,” *KIU Interdisciplinary Journal of Humanities and Social Sciences* 5, no. 2 (2024): 212–27, <https://kijhus.kiu.ac.ug/article-view.php?i=267&t=an-examination-of-the-rationale-for-the-law-against-international-crimes>.

<sup>100</sup> Godswill Owoche Antai et al., “An Examination of the African Response to International Crimes and Extradition Vis-a-Vis Inter-Regional Cooperation,” *African Journal of Law and Justice System (AJLJS)* 3, no. 2 (2024): 5–24, <https://doi.org/https://doi.org/10.31920/2753-3123/2024/v3n2a1>.

legal aid NGOs, have continued to challenge arbitrary removals in courts, through public interest litigation, and via global human rights campaigns.<sup>101</sup> The actions also generated additional scrutiny and opposition to state-enforced brutality, although enforcement remained an issue.<sup>102</sup> Finally, the implications of these surreptitious extraditions and extrajudicial deportations in Nigeria are very worrying because they impinge on the lifeblood of human dignity, Justice and global responsibility at its very core. Furthermore, they serve to expose the mortal weakness of legal protection at the hands of law enforcement and reconfirm the need for a closer guard by institutions, judicial scrutiny, and adherence to all relevant legal norms on behalf of all persons within or outside Nigeria's geographical borders.<sup>103</sup>

## Conclusion

This research discovered that Nigeria, alongside other states, at times has resorted to extrajudicial actions—secret renditions, irregular transfers, and deportations without due process—in the effort to combat transnational crime and terrorism. However, they often infringe on constitution-based protections, as well as regional and international human rights covenants, including the African Charter on Human and Peoples' Rights and the International Covenant on Civil and Political Rights, to which Nigeria is a signatory. The research further established that the lack of publicity, judicial control, and procedural fairness within some extradition and deportation treaties undermines the doctrine of the rule of law and renders individuals vulnerable to being subjected to tortures, cruel, inhuman, or degrading treatment, and to arbitrary detention, and of a denial of the guarantee of a fair trial. This not only discredits Nigeria's human rights record but also sets a bad precedent that may be used for political or partisan ends. Furthermore, the research revealed gaps within the national legal provisions for extradition and deportation, including a lack of explicit guarantees under the principle of non-refoulement, limited legal avenues for affected persons, and a lack of proper institutional capability for enforcing human rights standards within law enforcement operations.<sup>104</sup> The increased use of bilateral security arrangements and loosely defined co-operations with foreign states—often outside of the control of the judiciary—also contributes

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<sup>101</sup> Godswill Owoche Antai, "Universality versus Cultural Relativism in International Human Rights: A Case Study of the Anti-Homosexuality Act of Uganda 2023," *LAA Journal of Management* 11, no. 2 (2024): 1–14, <https://doi.org/https://doi.org/10.59298/IAAJAM/2024/112.11400.00>.

<sup>102</sup> Paul Arnell, "The Contrasting Evolution of the Right to a Fair Trial in UK Extradition Law," *The International Journal of Human Rights* 22, no. 7 (August 9, 2018): 869–87, <https://doi.org/10.1080/13642987.2018.1485655>.

<sup>103</sup> Godswill i Owoche Anta et al., "Appraisal of the Use of Mediation and Negotiation in Conflict Resolution during Armed Conflicts in East Africa," *Idosr Journal of Arts and Management* 9, no. 3 (September 1, 2024): 31–46, <https://doi.org/10.59298/IDOSRJAM/2024/9.3.3146>.

<sup>104</sup> Paul Atagamen Aidonojie et al., "The Challenges and Relevance of Technology in Administration of Justice and Human Security in Nigeria: Amidst the COVID-19 Pandemic," *Cogito Multidisciplinary Research Journal* 13, no. 3 (2021): 149–71, <https://www.cogitojournal.ro/index.php/cogito/issue/view/7>.

to the threat to individual freedoms. Based on the findings, the research suggests that while Nigeria has a valid interest in pursuing criminals outside its borders and protecting national security, this interest should not be at the expense of fundamental human rights. The state is obligated to strike a balance between its extradition and deportation authorities and its international and constitutional obligations to guarantee due process, respect the dignity of the individual, and uphold the rule of law.<sup>105</sup>

Based on the findings of this research, Nigeria should establish a comprehensive legal regime for extradition and deportation with explicit provisions mandating procedural protections consistent with international standards, such as due process, protection from torture, and the principle of non-refoulement. There should be judicial control by mandating judicial authorisation before any extradition or deportation is effected, and granting affected persons an opportunity to contest the same within the courts based on balanced and evenhanded hearings. Additionally, security agents, immigration personnel, and law enforcement officials involved in cross-border transfers should undergo regular refresher courses on human rights standards to ensure professionalism and prevent human rights abuses. There should be a separate watchdog body—perhaps within the National Human Rights Commission—mandated to monitor extradition and deportation processes, investigate complaints, and publish public reports with recommendations for redress. Nigeria should also reform existing bilateral and multilateral extradition treaties to ensure that they include human rights protection provisions and that future treaties be made conditional on the fulfilment of international legal standards. Major international treaties, such as the UN Convention against Torture and the African Charter on Human and Peoples’ Rights, should be domesticated and enacted to ensure their effective enforcement within Nigeria.

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<sup>105</sup> Godswill Owoche Antai et al., “Exploring Mechanisms for Enforcing Human Rights within the Context of International Law: Issues and Challenges,” *NIU Journal of Legal Studies* 10, no. 1 (2024): 59–70, <https://ijhumas.com/ojs/index.php/NIUJLS/article/view/1943>.

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