International Journal of Law and Society
2025, Vol. 8, No. 3, pp. 249-260
https://doi.org/10.11648/j.ijls.20250803.22

Research Article

Cybercrime and Ritualism: An Analysis Under the Criminal Code

Josephine Omi Obasohan*, Rita Akpata

Faculty of Law, Benson Idahosa University, Benin City, Nigeria

Abstract

Cybercrime and ritualism pose significant challenges to Nigeria's social, economic and legal systems. Cybercrime has damaged Nigeria's international reputation, deterred foreign investment, and caused significant financial losses for individuals and businesses alike. Despite the enactment of legislation such as the Cybercrime Act and the existing Criminal Code, the rate of cybercrime continues to rise, and reports of ritualistic problems in Nigeria that need to be addressed alongside legal reforms. This paper critically analyses the Nigerian Criminal Code provisions under cybercrime and ritualism. The study seeks to examine the provision of the Nigerian Criminal Code and Cybercrimes Act 2015; the socio-economic and cultural factors driving the rise of cybercrime and ritualism; effectiveness of law enforcement agencies and the judiciary in addressing these crimes, and to propose legal and policy recommendations aimed at curbing the prevalence of cybercrime and ritualism in Nigeria. The doctrinal methodology was adopted for the study and data were sourced from primary and secondary sources. The study finds that there is an inadequate specificity of the Nigerian Criminal Code on Cybercrime. It was found that the Criminal Code lacked specific provisions to address the growing problem of cybercrime in Nigeria. The study also found that the Cybercrime Act 2015 was a significant milestone in addressing the shortcomings of the Criminal Code regarding cybercrime. Even with the Cybercrime Act 2015 in place, law enforcement agencies face challenges in gathering sufficient evidence to successfully to prosecute cybercrime cases. The Nigerian Criminal Code contains general provisions that can be used to prosecute ritual killings under sections related to murder, kidnapping, grievous harm, and conspiracy. However, the Code does not explicitly address ritualistic motivations, which are often central to such crimes in Nigeria. The lack of a specific legal framework for ritualism means that cultural factors and the spiritual beliefs behind ritual killings are not adequately addressed in court proceedings.

Keywords

Cyber, Crime, Ritualism, Criminal-code, Nigeria

1. Introduction

A constant concern for humanity is the pursuit of peace, prosperity, and social harmony, where individuals can fully realize their purpose in life. This reflects a desire for an environment in which life can be genuinely celebrated, even as people anticipate its ultimate fulfilment. In the African traditional context, believers seeking to achieve this ideal often view ritual and sacrifice as acts that connects the individual with the spiritual being. [1] Rituals and sacrifices are central to many religions, particularly in African traditional religion. Ritualism involves performing specific ceremonies, often

*Corresponding author: omi4obasohan@yahoo.com (Josephine Omi Obasohan)

Received: 23 June 2025; **Accepted:** 25 July 2025; **Published:** 9 September 2025

using human or animal sacrifices, to call upon supernatural powers for personal benefits such as wealth, success, or protection. These practices are rooted in traditional spiritual beliefs and are frequently linked to occultism, where individuals seek to manipulate spiritual forces for self-serving purposes. In African traditional communities, rituals serve as a way for individuals or societies to connect with spiritual entities. [2] In Nigerian traditional culture, these beings are believed to have the power to both nurture and destroy, making it important to maintain a positive relationship with them. Additionally, rituals and sacrifices are believed to protect against harmful forces and evil spirits. [3].

The internet has provided a platform for both legitimate and illegitimate activities. Information technology is often described as a double-edged sword, capable of both constructive and destructive uses. While many internet users are responsible, law-abiding, and use the web for productive purposes, a small portion misuse the internet, breaking the law and exploiting others. [4] Those who exploit the internet for criminal activities are known as cybercriminals.

Cybercrimes can be defined as offences that are committed against individuals or groups of individuals with a criminal motive to intentionally harm the reputation of the victim or cause physical or mental harm or loss, to the victim directly or indirectly, using modern telecommunications networks such as internet and mobile phones.[5] Cybercrime has become an integral part of the transnational threat landscape and conjures up pressing images of nefarious and increasingly complex online activity.[6] A study by Norton [7] puts the cost of cybercrime globally at $220 billion annually. In essence, the innovations in technology have opened a vista of possibilities for pursuit of a criminal and deviant career.

In Africa, cybercrime has been indigenously christened. For instance, in Nigeria, it is called *Yahoo yahoo*, while the perpetrators are called “yahoo boys”. [8] In Ghana, it is called “sakawa” or “yahoo yahoo”, while in Cameroon, it is called “Faymania”. In Nigeria, the majority of cybercriminals are young people and are found in universities. According to Alubo, [9] cybercrime, characterized by criminal activities conducted through digital platforms, has gained international attention, with Nigeria being famous for its association with various forms of online fraud, including phishing, hacking and “yahoo-yahoo” scams.

In Nigeria, cybercrime is increasing each day in Nigeria as the internet continues to permeate every nook and cranny of our society and no one can predict the next dimension. [10] According to Michael, [11] there is hardly any crime which is perpetrated on the cyberspace without a Nigerian being involved. The author further added that the level of socio-economic struggles, including high unemployment rates, poverty and income inequality, have created an environment in which individuals seek illicit means of gaining wealth and social mobility. Thus, cybercrime has become an attractive option for young Nigerians who see it as a faster route to financial success. Over the years, cybercrime has damaged Nigeria’s international reputation, deterred foreign investment, and caused significant financial losses for individuals and businesses alike. [12] In response to the various requests and demands from concerned stakeholders in both the Information Communication Technology and legal sectors, former President Goodluck Jonathan, at the twilight of his administration, signed into law the Cybercrimes (Prohibition, Prevention, Etc.) Act 2015. However, cybercrime was already widespread before the enactment of the Act, which was enacted to contain the growing spate of internet offenses by seeking to arrest and prosecute and sentence anyone found guilty of committing cybercrime and allied offenses.

Alongside this, ritualism which has deep cultural roots in certain parts of Nigeria, has evolved with individuals using it as a means to enhance their chances of success in these cybercriminal ventures. Ritualistic practices have added a layer of brutality to these crimes, creating fear and insecurity among local communities. [13] This has led to a phenomenon known as “Yahoo Plus”, where ritualism is incorporated into their scamming activities. These individuals utilize human sacrifices, body parts, or juju (charms) with the belief that supernatural forces will increase their fraudulent gains.

The increasing belief in supernatural means for gaining wealth is closely tied to traditional and cultural concepts of juju and witchcraft, which are addressed by the Criminal Code. [14] The Code provides a legal framework for prosecuting individuals involved in ritualistic practices, including the use of charms, juju, or any form of witchcraft. However, its effectiveness in curbing the rise of ritualism among cybercriminals remains uncertain, highlighting the need for a thorough examination of these laws. This paper seeks to critically explore these interconnected issues by reviewing the Nigerian Criminal Code's provisions on cybercrime and ritualism, assessing legal responses to both, and considering their prevalence along with the cultural and socio-economic factors fuelling their rise.

2. Conceptual Clarification

2.1. Cybercrime

Cybercrimes are offenses committed against individuals or groups with the intent to harm the victim's reputation or cause physical or mental harm, either directly or indirectly, using modern telecommunication networks like the Internet and mobile phones. In simple terms, cybercrime refers to criminal activities carried out using a computer system. The term was introduced to differentiate computer programs (and coordinated sets of programs) specifically designed to facilitate financial crime from other harmful software.[15] Cybercrime encompasses using computers and the internet to deceive unsuspecting victims, including identity theft, credit card fraud (where credit card or bank details are stolen and used for purchases), and money laundering by terrorists and organized crime groups. [16].

Cybercrimes refer to criminal acts carried out entirely in cyberspace, such as identity theft and bank fraud, or those involving a physical element but facilitated by internet-based tools. [17] These acts often include activities like distributing fraudulent emails, sharing child pornography online, unauthorized access to computer files or theft of confidential information, spreading viruses, selling illegal goods or substances online, and identity theft or forgery. [18] Other forms include cyber-terrorism, [19] cyberstalking, [20] logic bombing, [21] password sniffing, [22] and piracy. [23].

Internet usage is rising quickly in Nigeria, and according to Nnamdi and Agu, [24] this increase would further be driven by the growing availability of broadband due to mobile telecommunications and reduced subscription fees. Many Nigerians and businesses are now very active on various social media platforms. The internet's integration into different aspects of socio-economic life, such as e-banking, e-commerce, e-education, and e-governance, has led to the emergence of new forms of cybercrime as technology advances. Cybercrime is widespread in Nigeria, and a Federal Bureau of Investigation (FBI) report [25] ranks the country third among the world's top sources of cybercrime, responsible for 8% of cases, following the U. S. (65%) and the U. K. (9.9%). Ladan [26] notes that Nigeria also leads in Africa as both a target and origin of harmful cyber activities, a trend that is spreading across West Africa. Likewise, Saulawa and Abubakar highlight Nigeria's exceptionally high per capita impact from cybercrime, with Nigerian financial scams being the fastest-growing online fraud, hitting 90% in 2011. [27] According to Tsado et al., [28] Nigeria has gained a reputation for being the source of "419 emails," referring to Section 419 of the Nigerian Criminal Code, which prohibits advance fee fraud. For instance, Hassan, Lass, and Makinde reported that UPS (United Parcel Service) agents uncovered a record-breaking scam valued at $2.1 billion (approximately N252 billion) in Lagos. [29].

The nature of cybercrime in Nigeria is continually evolving with the emergence of new technologies. Accordingly, Kamini [30] posits that most cybercrimes in Nigeria are tool cybercrimes in nature. This implies that cyber criminals in Nigeria mostly use the computer and internet as a tool to defraud and harm others instead of targeting the computers. He argues that this is so because Nigerians are yet to develop their technical knowledge to accommodate and perpetrate target cybercrimes. Relatedly, Saulawa and Abubakar argues that generally cybercrimes in Nigeria are targeted at individuals and not directly to computer systems hence requiring less technical expertise on the part of the criminals. These kinds of tool cybercrimes prevalent in Nigeria are perpetrated using different kinds of computer and telecommunication tools operational in the country. Idowu [31] suggests that the prominent forms of cybercrime in Nigeria are cloning of websites, false representations, internet purchase and other e-commerce kinds of fraud. Similarly, Olugbodi, [32] identified website cloning, financial fraud also popularly known as *Yahoo-Yahoo*, identity theft, credit card theft, cyber theft, cyber harassment, fraudulent electronic mails, cyber laundering and virus/ worms/ Trojans.

In Nigeria, cybercrime is committed by people of all ages, though it is most common among the youth. Many young individuals engage in cybercrime to become top hackers or as a means of making money, as hacking tools have become more affordable. For a significant number of youths, cybercrime is now seen as a way to earn a living. Nigeria faces high levels of poverty, unemployment, and corruption, driving people to seek any means, legal or illegal, to survive.

However, Nigeria is not the only country facing cybercrime issues. The rise in cybercrime in Nigeria is partly due to a lack of security awareness and underreporting of incidents. While some people use the internet simply to chat or gather information, many are not equipped to protect their data or devices from malicious attacks. In addition to traditional crimes like exam fraud, rape, robbery, and assault, cybercrime has emerged as a significant problem. This growing issue is damaging the nation's economy and eroding trust in Nigerian business credibility. For instance, countries like France now require webcam verification for many online transactions involving Nigeria, making it harder for legitimate Nigerian businesses to operate. [33].

Studies on cybercrime often focus on the Western world, overlooking the fact that cybercrime transcends geographic and political boundaries. [34] Anyone with internet access can engage in criminal activities from anywhere in the world. [35] Awe [36] confirmed that cyberattacks can be launched from one location and executed in another, regardless of geography, and that the internet makes these crimes faster, easier, and potentially more destructive. This highlights that cybercrime is a global issue, creating a serious image problem for the Nigerian government, which is struggling to find solutions.

In Nigeria, individuals commonly known as "yahoo yahoo boys" exploit online e-commerce systems to scam victims, often foreigners, out of thousands or even millions of dollars. These fraudsters typically pretend to offer goods or services or claim involvement in loan schemes. [37] They may also pose as representatives of financial institutions that provide loans to potential investors. As a result, many people have been deceived or fallen victim to these schemes. However, these are just some of the methods used by cybercriminals. [38].

Efforts by governments and international organizations to combat cybercrime have been largely ineffective due to difficulties in identifying the perpetrators. Research by Zero Tolerance shows that most cybercriminals are between 18 and 30 years old, and they engage in such activities to improve their financial situation and enjoy a better lifestyle. [39].

2.2. Ritualism

In Nigeria, ritualism refers to the use of human body parts, blood, or other materials in sacrificial rites, believed to bring wealth, success, or power. A ritual is a set of prescribed patterns or procedures for performing religious actions or ceremonies, [40] and sacrifice plays a crucial role in these rituals.[41] Sacrifice involves giving up something of value to gain something of greater importance.[42] Human sacrifice, in particular, is a form of blood sacrifice, where a living being is killed as an offering to a god or spirit, usually with the expectation of receiving good fortune or the fulfilment of a specific prayer in return.[43] The objects used in such rituals may include whole or severed human body parts like the head, genitals, breasts, eyes, intestines, arms, legs, or even parts of exhumed bodies. Ritual sacrifices are often seen as a "faith strategy" to acquire money, wealth, success, fame, favor, power, or protection from harm.

The practice of ritualism in Nigeria and other parts of Africa dates back to the pre-colonial era. Many pre-colonial African societies performed ritual sacrifices to their deities, and in some cases, this included human sacrifices. The choice of sacrificial victims varied based on the purpose of the ritual and the specific society involved, as did the processes for selecting them. In certain societies, a curfew might be declared, and those who violated it could be chosen as sacrificial victims, which is why strangers or immigrants often became targets in some communities. In such instances, guards enforcing the ritual laws would capture the victim. Additionally, slaves were sometimes used in ritual sacrifices in other societies.

Human sacrifice was considered the most significant and costly form of ritual, often carried out during times of national crisis to appease the gods and purify the community. For example, Adefila and Opeola [44] noted that the Yoruba people of southwestern Nigeria had a tradition of human sacrifice, primarily using enslaved individuals, before embarking on military campaigns between the 11th and 19th centuries. Human sacrifice was seen not as a disregard for life, but as a belief that it was better to sacrifice an individual for the greater good of the community, rather than risk the well-being of all. Despite this, human sacrifice has never been universally accepted in Africa, and there are instances where it was seen as a corrupt form of traditional African religion. [45] Human sacrifice carried out by private individuals or groups outside the context of communal rituals is never accepted in African tradition. Rituals in African culture are collective expressions of continuity and unity, meant to reflect a communal identity through group participation. Private sacrifices involving human victims are considered defiled rituals in African tradition, violating the sanctity of life and the communal values of African society.

Amadi Okereafor, the chief priest of the Umuohoko community in Imo State, emphasized that such practices are seen as ritual murder in Igbo tradition, and anyone found guilty of it would be banished from the community.[46] Among the Yoruba, the Ogboni cult served as a system to regulate private rituals and prevent the misuse of public rituals.[47] Similarly, in Ghana, the Akan people had anti-witchcraft movements like Sakrabundi and Aberewa during the pre-colonial and early colonial periods.[48].

Under colonial rule, practices such as human sacrifice, witchcraft, juju, magical powers, and ordeal rituals were outlawed across Africa. [49] These practices were criminalized in Nigeria's penal code starting in 1916. Similar laws, like the Witchcraft Act, were enacted in Zambia in 1914 and in South Africa in 1957. These legal measures aimed to help colonial and apartheid regimes establish political, economic, and social control in Africa. [50] As a result, the criminalization of human sacrifice and other harmful rituals successfully removed them from public life in Africa. Consequently, legal systems in African states have operated on the assumption that such beliefs no longer exist. However, these practices have persisted, adapting to both colonial and post-colonial contexts. [51].

The European colonization of Africa promoted individualism, undermining communal values.[52] As a result, private rituals became more common, particularly among the upper class, as certain African rulers aligned with European powers sought regime security in pre-colonial and colonial states.[53] Elites involved in the slave trade and other economic ventures sought special protection and wealth preservation, while some members of the masses also turned to private rituals in hopes of improving their fortunes. This widespread desire for power, fame, wealth, and protection fuelled the rise of private rituals at the expense of communal ones. This trend was further strengthened by the spread of Christianity, Islam, and the criminalization of many public rituals across Africa.

In the pre-colonial era, enslaved individuals were the primary victims of private rituals involving human sacrifice, as these practices were typically carried out by despotic kings, military leaders, and wealthy slave traders. However, the abolition of the slave trade and slavery by colonial powers, along with the criminalization of ritual killings, pushed such practices into secrecy. In modern times, young women and children have become the main targets of ritual sacrifices in Africa. [54] For children, this gave rise to what is now called "gb ómo gb ómo" (child kidnapping) in south-western Nigeria. Ritualistic activities in Nigeria have grown more sophisticated, extending beyond child abduction to include other crimes like murder and fraud.

The resurgence of ritualism in Nigeria has been linked to the desire for quick wealth, often tied to cybercrime. This form of ritualism, popularly known as “Yahoo Plus,” involves cybercriminals seeking spiritual power or protection to succeed in their fraudulent activities. This often involves consulting ritualists or traditional healers to perform rites involving human sacrifice. The belief is that these rites increase their chances of scamming victims successfully.

Human sacrifice, kidnapping for ritual purposes, and related practices are strictly prohibited in Nigeria. According to Section 201(c) of the Nigerian Criminal Code Act of 1990, it is a punishable offense for anyone to "make, sell, use, or assist in making or selling, or possess any juju, drug, or charm believed to have the power to prevent or compel a person from doing something they have the legal right to do or refrain from doing."

2.3. The Interconnection Between Cybercrime and Ritualism

The intersection of cybercrime and ritualism in Nigeria represents a disturbing trend that links traditional beliefs with modern technology-driven crime. Many young people involved in cybercrime resort to ritualistic practices as part of their criminal schemes. This phenomenon has been popularized by certain media reports and social narratives, which suggest that success in cyber fraud can be enhanced through the invocation of spiritual forces. The socio-economic motivations behind both cybercrime and ritualism are closely related, driven by poverty, unemployment, and the quest for material success in a challenging economic environment.

Online dating has emerged as one of the most profitable forms of cybercrime in which students engaged in online fraud (referred to as "yahoo yahoo") participate in Nigeria. This trend is not surprising, given that their age group equips them with the necessary persuasive and deceitful language to target victims. Online dating typically involves visiting chat rooms and dedicated singles websites to connect with others. While some individuals may send fraudulent emails, their primary focus is on online dating scams. Unlike traditional *yahoo yahoo* schemes, which often incorporate spiritual elements, these scammers have adapted to changes in their environment. Ritualism has become widespread, and it is rare to find a cybercriminal who has not incorporated some form of spiritual element into their activities. This observation aligns with Madukasi's research, which indicates that "internet fraudsters are increasingly blending spirituality with cybercrime to achieve success."[55] He noted that yahoo boys find it challenging to succeed without integrating spiritual components into their schemes. He further clarified that engaging in rituals involves more than just visiting a traditional healer, contrary to the common belief held by many in society.

According to Oludayo, three reasons can be identified for the decreased rates of victimization. First, there is a growing awareness among potential victims regarding the techniques and strategies employed by yahoo boys. The author noted increased media coverage highlighting the activities of these fraudsters, leading many individuals to become more cautious in online interactions. Second, there has been a slowdown in response rates and delayed success in fraudulent transactions. This change is likely linked to the first factor, as people are now spending more time verifying information rather than engaging immediately. Third, the activities of Nigeria's anti-corruption agency, the Economic and Financial Crimes Commission (EFCC), have also played a role. The EFCC has intensified university raids, hotel raids and even home raids where these fraudsters train or carry out their trainings and activities, also known as *HK*; thus, resulting in numerous successful convictions. [56] As at April 2022, the EFCC had convicted over 1288 internet fraudsters, with 1234 cases still in prosecution. [57].

In response to these challenges, a new wave of cybercriminals has emerged known as "yahoo plus." Their strategy aims to increase victimization rates by incorporating spiritual assistance into their scams. This new phenomenon combines elements of spirituality, such as the use of charms or juju, with online activities. The spiritual component is the "plus" in yahoo plus, marking a significant departure from the traditional yahoo boys. In this paper, yahoo plus is referred to as "cyber spiritualism."

The intense pursuit of material wealth in Nigerian society is seen as a key factor driving young people to develop nefarious methods of achieving success, bypassing established societal norms. Typically, young individuals are expected to complete their education, fulfil mandatory youth service, and secure employment. Only after gaining employment does society recognize a wealthy young person as having succeeded through the "approved means." However, widespread corruption in Nigeria often leads youths to abandon hard work in favour of seeking wealth by any means necessary.

Peer influence plays a crucial role, particularly for students who leave home with limited resources to meet their socio-economic needs while in school. This situation affects children from both affluent and disadvantaged backgrounds. Gaviria and Raphael [58] argue that social interactions among peers are pivotal in the onset of deviant behavior. The temporary freedom from parental control has led to a generation of children who explore their surroundings without considering the impact on their families. As economic pressures rise, parenting in Nigeria has become less effective, leaving children to rely on the Internet and peer guidance, while parents focus on financial pursuits.

Another factor is greed, which stems from an insatiable desire to attain what exceeds one's capabilities. Luxuries such as exotic cars, smart phones, club memberships, and having multiple romantic partners have become symbols of status among the youth in Nigeria, indicating who is a “big boy” and who is merely pretending to be one. For some, engaging in cyber fraud serves as a form of retribution against foreigners. Those involved in these activities argue that foreigners have exploited their families to develop their own countries while leaving them impoverished. They justify their actions by criticizing their detractors and claiming that the victims of their scams are equally greedy. As a result, cyber spiritualism has become one method they use to "fight for justice."

3. Analysis of the Criminal Code Provision on Cybercrime and Ritualism

3.1. Nigerian Criminal Code Provision on Cybercrime

The Nigerian Criminal Code hereinafter referred to as "CC" is the foundational legal document that outlines criminal offenses and their corresponding punishments in the country. Enacted in 1916, it is one of the primary legislative frameworks governing criminal activities in Nigeria. However, the evolution of technology has necessitated more specific legal instruments to address the increasing sophistication and prevalence of cybercrime. While the CC does address some aspects of fraud and related crimes, it is limited in its ability to comprehensively cover the multifaceted nature of cybercrime.

Fraud is one of the most commonly prosecuted crimes in Nigeria under the CC, and many forms of cybercrime fall under the broader category of fraud. For instance, Section 419 of the CC criminalizes obtaining property or services through fraudulent means, commonly referred to as "419 fraud" in Nigeria. This provision has been applied to traditional scams, such as face-to-face fraudulent schemes, but also to some forms of online fraud, particularly where victims are tricked into transferring funds under false pretence. The CC criminalizes and sanctions any type of stealing of funds, in whatever form and also false pretences. Although, cybercrime is not specifically mentioned here, crimes such as betting, theft and false pretences performed through the aid of computers and computer networks is a type of crime punishable under the CC**.** Section 239(2) (a) and 240A of the code prohibit betting and public lotteries respectively. Section 239(2)(a) provides that any house, room or place which is used for the purpose of any money or other property, being paid or received therein by or on behalf of such owner, occupier, or keeper or person using the place as or for an assurance, undertaking, promise, or agreement, express or implied, to pay or give thereafter any money or other property on any event or contingency of or relating to any horse race or other fight, game, sport or exercise, of any house, room, or place knowingly and willfully permits it to be opened, kept or used or any person who has the use or management of such business of a common betting house is guilty and liable to imprisonment for one year, and to a fine of one thousand naira. This Section can be used by law enforcement agencies to regulate **'**Online Betting' or prosecute such persons as would contravene this Section. Section 240 CCalso defines 'public lottery' to mean a lottery to which the public or any class of the public has, or may have access and every lottery shall, until contrary is proved be deemed to be a public lottery. 'Lottery' includes any game, method or device whereby money or money's worth is distributed or allotted in any manner depending upon or to be determined by chance or lo**t.** Section 240A CC (c) provides that every person who writes, prints, publishes or causes to be written, printed or published, any lottery ticket or any announcement relating to public lottery shall be liable to a fine not exceeding six (6) months. This Section also covers lotteries done with the use of computers or on the internet as being an offence and can be used to combat this crime. Section 418 CCdefines false pretence as any representation made by words, writing, or conduct of a matter of fact, either past or present, which representation is false in fact and which the person making it knows to be false or does not believe to be true.' Cybercrime that would fall under this Section would mainly bother on computer related fraud. By their fraudulent action, cybercriminals deceive their victims by pretending to have abilities or skills which ordinarily they do not have or possess. Most of the activities of these cyber criminals bother on false pretences and cheating which Section 419 and421of this CC prohibit respectively. Section 419states that 'any person who by any false pretence, and with the intent to defraud, obtains from any other person anything capable of being stolen or induces any other person deliver to any person anything capable of being stolen, is guilty of a felony and is liable to imprisonment for three years.'

Furthermore, a suspect could also be charged under Section 421 of the CC which provides that 'any person who by means of any fraudulent trick or device obtains from any other person anything capable of being stolen, or induces any other person to deliver to any person anything capable of being stolen or to pay or deliver to any person any money or goods, or any greater sum of money or greater quantity of goods than he would have paid or delivered but for such trick or device, is guilty of a misdemeanour, and is liable to imprisonment for two years. A person found committing the offence may be arrested without warrant' Unfortunately, the criminal code is a British legacy which predates the Internet era and understandably does not specifically address email scams.[59] For example, notwithstanding that Section 419 of the CC criminalizes computer-related fraud; the position that a suspect cannot be arrested without a warrant, unless found committing the offence, does not reflect the crime's presence or perpetration in cyberspace.[60] Only in exceptional circumstances could a suspect be caught in the act, especially with the advancement of technology in the information world of today. Aside from the fact that Nigeria lacks the resources to police activities of Nigerians on cyberspace, doing so could actually raise privacy or other rights issues. Also, the punishment for an internet fraudster which is three years imprisonment or seven years if the value of stolen property exceeds one thousand naira is to say the least paltry compared to the enormity of the crime and unjust rewards that usually run into millions of dollars. Moreover, in criminal trials, the state is the complainant. And under the Nigerian criminal justice system, there is hardly any form of compensation for the victims of the crime.

Thus, the CC was not originally designed to address the unique aspects of cybercrime, such as identity theft, hacking, and the use of sophisticated technological tools to commit fraud. Many traditional fraud cases under Section 419 of the CC involve physical interactions or the use of non-digital platforms, limiting its application to cyber-related cases without additional legislative support.

The limitations of the Nigerian Criminal Code in addressing cybercrime became evident with the rapid expansion of digital technologies. Cybercrime involves the use of the internet, computer systems, and digital devices to commit illegal activities. The traditional understanding of fraud under the CC did not anticipate the global reach, anonymity, and technological complexity of online crimes. As a result, the legal definitions and procedures outlined in the CC, while sufficient for conventional crimes, were unable to adequately tackle the modern dimensions of cybercrime.

The major challenges were based on the fact that cybercriminals often operate from various jurisdictions, making it difficult to trace their identity or location. The Nigerian Criminal Code, being a domestic law, does not have provisions that address cross-border cooperation or international cybercrime investigations. [61] Additionally, the CC does not account for the use of encryption, hacking tools, malware, or other sophisticated digital techniques used by cybercriminals. Thirdly, the traditional criminal law framework focuses on tangible evidence, while cybercrime often involves digital evidence that requires specialized knowledge to collect, preserve, and present in court.[62] Lastly, the CC lacks specific provisions for emerging crimes such as identity theft, online impersonation, and cyber bullying, which are increasingly becoming prevalent.[1] Before the enactment of the Cybercrimes (Prohibition, Prevention, Etc.) Act 2015**,** Nigeria faced significant challenges in prosecuting cybercriminals due to the limitations of its existing legal framework, particularly the CC. It was largely focused on traditional criminal activities such as theft, fraud, and impersonation, which were not designed to tackle the complexities of cybercrime In the case of *FRN v. Emmanuel Nwude & Ors,*[2] the defendants were responsible for one of the most famous fraud schemes in Nigerian history. Between 1995 and 1998, they duped a Brazilian bank manager, Nelson Sakaguchi, into believing that he was investing in the construction of an airport in Abuja, swindling him out of $242 million. While much of the fraud was orchestrated through face-to-face interactions and correspondence, it also relied heavily on emails and other digital communications. Nwude was charged under Section 419 of the Criminal Code for obtaining money by false pretenses. However, the prosecution struggled to fully address the online components of the fraud, such as the use of emails and digital platforms to facilitate the scheme. The Criminal Code did not specifically account for cyber-based elements of fraud, which limited the prosecution’s ability to deal with digital evidence and other technological aspects. Nwude was eventually convicted of fraud and sentenced to five years in prison. However, the limitations of the Criminal Code in addressing the digital aspects of the crime meant that his prosecution was largely based on traditional fraud statutes. This case also highlighted the need for a legal framework that could specifically address cybercrime and the use of digital tools in fraud.

In view of the above, it is pertinent to note that these cases demonstrate that prior to the Cybercrimes (Prohibition, Prevention, Etc.) Act 2015, the Nigerian Criminal Code was insufficient to address the full scope of cybercriminal activities. While the Criminal Code provided a foundation for prosecuting traditional fraud and theft, it was not designed to tackle the unique challenges posed by cybercrime, including hacking, online fraud, and digital identity theft. The limitations of the Criminal Code became increasingly evident as cybercriminals began to exploit technological advancements, prompting the need for a more comprehensive legal framework. The eventual passage of the Cybercrimes Act 2015 was a response to these challenges, providing Nigeria with the legal tools necessary to combat cybercrime more effectively.

3.2. Cybercrimes (Prohibition, Prevention, Etc) Act 2015[3]

With the enactment of the Cybercrimes Act [63], Nigeria has more specific provisions for dealing with cybercrime. This is an Act that provides for the prohibition, prevention, detection, response and prosecution of cybercrimes and other related matters. The Act is divided into eight parts. Part I provides for the objectives and application of the Act, Part II provides for the protection of critical national infrastructure, part III provides for offences and penalties, Part IV provides for duties of service providers, Part V provides for administration and enforcement, Part VI of the Act provides for search, arrest and prosecution, Part VII provides for jurisdiction and international co-operation and Part VIII provides for miscellaneous.

The Act discusses unlawful interception of communications, where it further provides that any person, who inten-

[1] For instance, in the case of FRN v Fred Ajudua [1]Fred Ajudua, reported in ID/354C/2003
a notorious Nigerian fraudster, was involved in several high-profile advance-fee fraud (419) schemes in the early 2000s. His scams primarily targeted foreigners, defrauding them of large sums of money by promising non-existent lucrative contracts, business opportunities, or inheritances. While much of the fraud took place using telephone calls and written letters, the scams also utilized emerging online platforms, a precursor to what became known as “Yahoo Yahoo” scams. The CC (particularly Section 419, which criminalizes obtaining property by false pretences) was invoked to prosecute Ajudua. However, the legal framework lacked provisions to address the use of the internet and digital platforms, which were instrumental in his fraudulent schemes. The inability to charge Ajudua with specific online fraud-related offenses meant that the case could only be prosecuted under general fraud provisions, which limited the scope of his prosecution. This hindered the court's ability to comprehensively address the full extent of his activities, especially the technological tools used in his operations. Thus, despite years of litigation, Ajudua was able to exploit legal loopholes, including technicalities in the criminal proceedings, to delay his trial. His prosecution exposed the limitations of the Criminal Code in tackling cybercrime-related offenses, as the legal provisions were not sufficiently adaptable to the technological advancements involved in the crime.

[2] ID/92C/2004

[3] Cybercrimes (Prohibition, Prevention, Etc) Act 2015

tionally and without authorization or in excess of authority intercepts any data from a computer to or from a computer, computer system or connected system or network commits an offence and liable on conviction to imprisonment for a term of not less than two years or to a fine of not less than five million naira or to both fine and imprisonment. This Section aims to secure the internet which is a collection of information, protect data and protect the privacy of individuals in relation to the information they transfer through the net.

The Act also establish numerous other crimes, including unauthorized modification of a computer program or data, system interference, misuse of devices, computer-related fraud, identity theft or impersonation, cyber stalking, and cyber squatting. Section 17of the Act also criminalizes cyber-terrorism and provides that any person who accesses or causes to be accessed any computer system for the purpose of committing a terrorist act as defined under Terrorism (Prevention) Act 2011as amended commits a cyber terrorism offence and he is thus liable to life imprisonment upon conviction. The Act also criminalizes child pornography and creates two classes of offenses under this category. The first involves the use of a computer network for the purpose of, among other activities, the possession, production, and/or distribution of materials depicting a minor, a person appearing to be a minor, or images representing a minor engaged in sexually explicit conduct. The second involves the use of 'information and communication technologies' to engage in such acts as luring and meeting (here the crime requires two elements to exist: communicating with a child online followed by an in person meeting) with s child for the purpose of engaging in sexual activities or recruiting a child to participate in a pornographic performance. The penalties for the offences would range from a five to ten year prison term or fines ranging from ten to twenty million naira, or both, depending on the particular offense.

The use of a computer system or network to distribute racist or xenophobic materials, materials that deny, approve, or justify acts that constitute genocide or crimes against humanity, or the use of a computer system or network for racist or xenophobic insults, would constitute an offense underSection 18of the Act, and upon conviction, the offender would be subject to a sentence of at least five years in prison and or a minimum of ten million naira fine.

3.3. Nigerian Criminal Code Provisions on Ritualism

The Nigerian Criminal Code addresses ritualistic crimes under its provisions dealing with homicide, bodily harm, and offensive conduct. While the Nigerian CC does not explicitly define or use the term "ritualism", it criminalizes acts associated with it, such as murder, kidnapping, grievous harm, and unlawful possession of human body parts. These crimes are prosecuted under the general provisions of the Code that address homicide, mutilation, and related offenses. [64].

Section 316 of the CC defines murder as the unlawful killing of another person with intent to kill or cause grievous bodily harm. Although ritual killings are not specifically mentioned in this section, ritual killings often involve premeditated murder to harvest human body parts, making this provision applicable. The elements of premeditation and intent are crucial in prosecuting ritual killers under this section. In the case of Queen v Okechukwu[4], the defendant was charged with murder under Section 316 of the CC for killing a woman and removing certain body parts for ritual purposes. The court was able to secure a conviction because it could prove premeditation and intent to kill, which aligned with the statutory definition of murder in the CC. Ritual killings typically involve individuals with the specific intention of killing another person to use their body parts for ritualistic purposes, which falls squarely under the definition of murder as per this provision. The penalties for murder, as stated in Section 319, include capital punishment (death penalty). Section 317 defines manslaughter as unlawful killing without the intent required for murder. Although less common in cases of ritual killings, manslaughter may apply if the prosecution cannot prove intent to kill but can prove the killing occurred as part of a ritual practice. This section might be used when the offender's actions, though reckless or negligent, did not involve a direct intent to kill but resulted in a fatal outcome during ritual practices. Section 364 of the CC criminalizes kidnapping, defined as unlawfully capturing and detaining an individual against their will. It is a common precursor to ritual killings, as victims are often abducted for the purpose of being murdered or used in ritual practices. The section stipulates severe punishments for anyone convicted of kidnapping, including imprisonment for ten years or more. This provision is particularly relevant to ritualistic practices, where victims are often forcibly taken from their homes, schools, or streets. Once kidnapped, they are subjected to physical harm or murder as part of a ritual. The combination of kidnapping and murder for ritualistic purposes often aggravates the charges, leading to more severe penalties under the law. Ritual practices often involve not only murder but also the mutilation of victims. Section 242 addresses cases of grievous harm, which involves maiming, mutilating, or otherwise injuring an individual in ways that result in long-term physical damage or disfigurement. This section is relevant in cases where the victim is not killed but is subjected to bodily harm for ritual purposes. The punishment for causing grievous harm can include long-term imprisonment.

While not explicitly mentioning ritualism, Section 329 of the CC criminalizes the unlawful possession of human body parts, which are often used in ritual killings. This section was included to address the growing trend of individuals involved in the trafficking and use of human body parts for occult and ritualistic purposes. It is unlawful for any person to be in possession of any part of a human body unless authorized by law (such as for medical or educational purposes). This pro-

[4] (1957)SC

vision is significant because ritual killings often involve the harvest and trade of human body parts, which are used in ritualistic rites believed to bring wealth, power, or protection. Section 329 provides the legal framework to prosecute individuals found in possession of such body parts, even when the actual killing cannot be directly linked to them. In *Adeoye v. State*,[5] the defendant was charged with the unlawful possession of human parts under Section 329 of the CC. He was found in possession of a human skull, which he claimed was for ritualistic purposes. The court convicted Adeoye under the provisions relating to possession of human parts, even though there was no direct evidence linking him to the killing. Section 211 criminalizes the administration or taking of unlawful ordeals or oaths that could result in the death or bodily injury to any party. Ritual oaths are a significant aspect of certain traditional societies and cult groups, where individuals are sworn to secrecy or bound to participate in ritual killings or other illegal acts. The criminalization of acts associated with ritualism in the Nigerian Criminal Code is deeply connected to the cultural beliefs and practices that have persisted in certain parts of Nigeria. Rituals involving human sacrifice, the use of body parts, and the belief in supernatural powers are prevalent in various traditional religions and occult practices across Nigeria. While these practices are often rooted in cultural and traditional belief systems, the law unequivocally treats them as criminal acts when they result in harm, murder, or other illegal activities. [65] However, the challenge in prosecuting ritual crimes under the CC lies in the clandestine nature of such activities. Ritual killings are often carried out in secret, with well-coordinated efforts to evade law enforcement. In many cases, the perpetrators are members of powerful traditional or political institutions, which makes it difficult for victims or their families to seek justice. [66].

4. Limitations of the Criminal Code

Although the CC has been effective in prosecuting crimes associated with ritualism, such as murder, kidnapping, grievous harm, and possession of human parts, it is not designed to address ritualism as a distinct offense. The limitations of the Code in these cases include lack of specific legislation on ritualism, difficulty in proving ritualistic intent, cultural and traditional barriers. [67] The criminal acts involved in ritualism are prosecuted under general provisions for murder, kidnapping, and bodily harm. This approach does not capture the ritualistic motivations or the organized nature of these practices, which are often part of larger cultic or religious traditions. In many cases, it is difficult to directly link the crime to ritualistic practices, as the law requires evidence of intent. Ritualism is often carried out in secret, making it challenging to gather the necessary proof that the crime was committed for ritual purposes. [68] Also, ritual killings are deeply rooted in cultural beliefs, and the absence of specific laws targeting ritualistic practices reflects the difficulty in overcoming these cultural barriers. Law enforcement and prosecutors face challenges in communities that may be sympathetic to the accused due to traditional or superstitious beliefs. While the Nigerian Criminal Code has been instrumental in securing convictions for crimes associated with ritualism, it has notable limitations in addressing the practice as a distinct criminal offense. Court cases like *R. v. Edet Bassey Akpan*, and *Adeoye v. State* illustrate that the Code's provisions on murder, kidnapping, and unlawful possession of human parts are effective to some extent, but they fall short of fully addressing the ritualistic dimensions of these crimes. There is a need for more specific legislation that recognizes ritualism as a distinct and organized form of criminal activity, with provisions that target not only the direct perpetrators but also the broader network of individuals involved in such practices. [69].

5. Conclusion

The desire for luxury life without corresponding means for hard work has become part of the Nigerian society due to wrong socialization of the youth into ostentatious life style display by some people in the society, without recourse to the source of the wealth. These and many other factors, such as the societal recognition of money as it answered all problems, have driven the youths to take partake the crime for ritualism. Due to the awareness of the activities of cybercriminals and their inability to successfully hypnotize the security operatives, cybercrime now involves wide participation of highly skilled people and influential people who play important roles to ensure the smooth running of their fraudulent activities. These people include but are not limited to application and software developers, hackers, and pickers, gift card buyers and sellers and so on. Cybercrime and ritualism in Nigeria are two interlinked challenges that reflect the broader socio-economic and cultural context of the country. While the Nigerian Criminal Code and other legal instruments provide a framework for addressing these issues, the enforcement of these laws faces numerous challenges. In this vein, it is pertinent for the Nigerian government to strengthen the law enforcement capabilities, reforming legal frameworks, promoting public education, and tackling the socio-economic conditions that drive individuals to engage in these criminal activities.

6. Recommendations

In analysing cybercrime and ritualism under the Nigerian Criminal Code, it becomes evident that while the law has provisions addressing aspects of these crimes, there are significant gaps in its ability to effectively tackle the evolving nature of both issues. Based on the findings from this analysis, the following recommendations are proposed:

1) The Nigerian government should introduce specific laws, apart from the Criminal Code, that explicitly criminalize

[5] (1999) 3 NWLR (Pt. 594) 264

ritualism and address the cultural practices and beliefs associated with these crimes. These laws should cover not just the perpetrators of the physical acts but also those who facilitate, finance, or otherwise contribute to ritual killings.

2) Judicial officers and law enforcement agents should be provided with continuous training on the evolving dynamics of ritualism and cybercrime. Specialized knowledge on how to investigate and prosecute these offenses, especially those involving digital technologies, is crucial for effective law enforcement. Many court cases have highlighted the challenges in gathering sufficient evidence for both ritualistic and cybercrime cases. Specialized training for law enforcement and judicial officers will help them better understand the nuances of these crimes, from identifying digital evidence in cybercrime cases to understanding ritualistic motivations and how to prove them in court.
3) The Nigerian government, in collaboration with non-governmental organizations (NGOs) and traditional institutions, should launch a series of public awareness campaigns to educate citizens on the dangers of ritualism and the legal consequences of cybercrime. These campaigns should emphasize the need to report suspicious activities and promote a culture of legal compliance.
4) Cybercrime is often perpetrated by individuals or groups operating from multiple jurisdictions, making it a transnational issue. The Nigerian Police Force (NPF) and other relevant security agencies should establish dedicated cybercrime units equipped with the necessary tools, skills, and technology to detect, investigate, and prosecute cybercrimes. These units should collaborate with international bodies to tackle cross-border cybercrimes.
5) The government should collaborate with traditional rulers and religious leaders in addressing ritualism, using a bottom-up approach. Efforts should be made to engage these leaders in sensitizing their communities on the dangers and illegality of ritual killings and to get their support in identifying perpetrators.
6) Nigeria should establish a comprehensive legal framework governing the collection, preservation, and admissibility of digital evidence in cybercrime cases. Courts need clear guidelines on how digital evidence should be handled, ensuring that it is accurately obtained and protected from tampering.
7) The Nigerian Police Force should strengthen community policing efforts to detect and prevent ritual killings. By involving community members in surveillance and information sharing, local law enforcement can act faster in identifying suspicious behaviour linked to ritualism. This will empower local residents to play an active role in preventing ritualism by reporting unusual activities and assisting the police in their investigations.

Abbreviations

CC Criminal Code

Author Contributions

Josephine Omi Obasohan: Funding acquisition, Writing – original draft, Writing – review & editing

RitaAkpata: Funding acquisition, Writing – original draft, Writing – review & editing

Conflicts of Interest

The authors declares no conflict of interest.

References

[1] Francis C. Madukasi, “Cybercrime and Ritualism: The Menace of ‘Yahoo Boys’ and the Demonization of Traditional Igbo Religion and Society” (2023) (2)(2) *Global Online Journal of Academic Research* 25-45.

[2] Saul Anyanwu, *Ibuzo Cultural Festival among the Igbo: Origins, Religion and Social Significance: A Case Sstudy of Mbomuzo, IhiteEtiti*(Owerri: Edu-Eby, 2010).

[3] Toyin Falola and Matthew, M. Heaton, *A History of Nigeria* (Texas: Cambridge University Press, 2012).

[4] Adedeji I. Adeniran, “The Internet and Emergence of Yahoo-Boys Sub-Culture in Nigeria” (2008) (2) (2) *International Journal of Cyber Criminology* 368.

[5] D.C. Halder, and K. Jaishanker “Cybercrime in Nigeria” http://9jalegal.com.ng/news/an-assessment-of-nigerias-cybercrimes-prohibition-prevention-etc-act-2015/ accessed 24th September 2024.

[6] Esharenana E. Adomi, and Stella, E. Igun, “CombatingCybercrime in Nigeria” (2008) (26) (1) *TheElectronic Library* 716-725.

[7] Norton Study, “Consumer Cybercrime estimated at $110 Billion Annually” http://www.symantec.com/about/news/release/article.jsp?prid=20120 accessed 2 October 2024.

[8] OludayoTade, and Israel Aliyu, “Social Organization ofCybercrime among UniversityUndergraduates in Nigeria” (2011) (5) (2) *InternationalJournal of Cyber Criminology* 860-875.

[9] O. Alubo, “The Public Space in Nigeria: Politics of Power, Gender and Exclusion” (2011) (36) (1) *Africa Development*, 75-95.

[10] Yusuf, I.A., “The New Phenomenon of Phishing, CreditCard Fraud, Identity Theft, Internet Piracyand Nigeria Criminal Law” British Journal of Arts andSocial Sciences, (2013) Vol.5, No.2, 9-13.

[11] A.V. Michael, “Cybercrime in Nigeria” http://www.nap.edu/catalog/12997.html accessed 23 September 2024.

[12] Abdul-Rahseed L. Sulaiman, Muhammed A. Yinusa, &AbdullateefRaji, "Cybercrime and Nigeria's External Image: A Critical Assessment" (2016) (9) (6) *Journal of Pan African Studies* 119-132.

[13] OludayoTade, "A Spiritual Dimension to Cybercrime in Nigeria: The '*Yahoo Plus*'Phenomenon" (2013) (23) *Human Affairs* 689-705.

[14] Criminal Code Act (Cap C38) Laws of the Federation of Nigeria 2004.

[15] B.O. Folashade, and K.A. Abimbola, The Nature, Causes and Consequences of Cybercrime in Tertiary Institutions in Kaduna State, Nigeria" (2013) (3) (9) *American International Journal of Contemporary Research* 40-60.

[16] HalderDebarati, and JaishankarKaruppanman, *CyberCrime and Victimization of Women, Laws,Rights and Regulations* (Hershey; IGI Global; 2012) 48-50.

[17] O.M. Atoyebi, "Addressing Challenges in the Prosecution of Cybercrimes in Nigeria: Legal Framework and Practical Implication" https://omaplex.com.ng/addressing-challenges-in-the-prosecution-of-cybercrimes-in-nigeria-legal-framework-and-practical-implication/ accessed 15th September 2024.

[18] Udosen J. Idem, Olarinde S. Elizabeth, "Cybercrime and its Negative Effects on Youth's Development, the Economy of Nigeria" 2023 International Conference on Cyber Management and Engineering https://www.researchgate.net/publication/368911330_Cybercrime_and_its_Negative_Effects_on_Youth's_Development_the_Economy_and_Nigeria accessed 3 October 2024.

[19] G. Sesan, "The New Security War" http://www.pcworld.com/article/2492/the-new-security-war accessed 3rd October 2024.

[20] R. Margaret, "What is Cyberstalking" http://www.searchsecurity.techtarget.com/definition/cyberstalking accessed 22 September 2024.

[21] P.O. Idogho, and S.S. Umar, "Evaluating the Major Causes of Cybercrime in Nigeria" https://www.academia.edu/8290416/EVALUATING_THE_MAJOR_CAUSES_OF_CYBE_RCRIME_IN_NIGERIA accessed 8 October 2024.

[22] P.C. Aaron, "Password Sniffing" http://nikssinghal12345.blogspot.com.ng/2014/01/password-sniffing.html accessed 23rd September, 2024.

[23] A.O. Ayoku, "The Evolving Sophistication of InternetAbuses in Africa" (2010) 37(1) *TheInternational Information and Library Review* 11-17.

[24] Nnamdi K. Akanni, and Agu, C. Queeneth, "Information and Communication Technology: An Evaluation of Cyber Crimes Laws in Nigeria" (2023) (3) (3) *Journal of International Trade Law and Contemporary Issues.*

[25] Federal Bureau of Investigation, "Cyber Investigations" (2021) http://www.gamji.com/article5000/news5995.htm accessed 13th September 2024.

[26] M.T. Ladan, "The Effectiveness of Legal and Enforcement Framework in Fighting Advance Fee Fraud and Money Laundering Activities" (2023).

[27] M. Saulawa, and M. K. Abubakar, "Cybercrime in Nigeria: An Overview of the Cybercrime Act of 2015" (2019) (4) (3) *Journal of Law, Policy and Globalization*, 22-41.

[28] Lucy Tsado, AbiodunRaufu, Emmanuel Ben-Edet, & Doris Krakrafaa-Bestman, "Combating the Threat of Cybercrime in Nigeria: Examining Current Laws and Policies" (2023) (5) (4) *Journal of Applied and Theoretical Social Sciences* https://mail.iccsor.com/index.php/jatss/article/view/201 accessed 7 October 2024.

[29] A.B. Hassan, F.D. Lass, and J. Makinde, "Cybercrime in Nigeria: Causes, Effects and the Way Out" (2012) (2) (7) *Journal of Science and Technology* 24-40.

[30] D. Kamini, "Cyber Crime in Society: Problems and Preventions", (2011) (3) (1) *Journal of Alternative Perspectives in the Social Sciences* 240-259.

[31] O. A. Idowu, "Implications of Cybercrime on the Sustainable National Development in Wuse, Abuja, F.C.T., Nigeria" (2021) (1) (1) *FUOYE Journal of Criminology and Security Studies.*

[32] K. Olugbodi, "Fighting Cybercrime in Nigeria" http://www.ssr.com/articles/cybercrime/about-nigeria accessed 9th October 2024.

[33] ThisDay Newspaper, "Growing Menace of Cybercrime" http://www.thisdaylive.com accessed 28th September, 2024.

[34] K. Kumar, *Cyber Laws, Intellectual Property and e-commerce Security* (New Delhi: Dominant Publishers and Distributors; 2003).

[35] D. Parker, *Fighting computer crimes*. (New York: Charles Scribner's and Sons; 2003).

[36] J. Awe, "Fighting Cybercrime in Nigeria" http://www.jidaw.com/itsolutions/security3.html accessed 21st September, 2024.

[37] O.R. Ehimen, and A. Bola, "Cybercrime in Nigeria" (2011) (3)(1) *Business Intelligence Journal* 9-21.

[38] C. Imhof, *Cybercrime and Telecommunications Law.*(USA; Rochester Institute of Technology;2010) 3.

[39] K. Urhibo "Combating and Addressing the Menaceof Cybercrime in Nigeria: An Overview ofApplicable Laws" (2021) (6) *AFJCLJ* 109-124.

[40] S. J. Mwalimu, "Rituals" in MolefiKete Asante andAmaMazama, *Encyclopedia of AfricanReligion* (California: Sage Publications, 2009) 30.

[41] S. Morgan, "Sacrifice" in David, A. Leeming, Kathryn Madden and Stanton Marlan, *Encyclopaedia of Psychology and Religion* (New York: Springer Science, 2010) 4.

[42] AyegboyinDeji, "Sacrifice" in MolefiKete Asante and AmaMazama, *Encyclopaedia of African Religion* (California: Sage Publications, 2009) 12.

[43] La Fontaine Jean, "Ritual Murder" (2011) (3) *Interventions Occasional Paper Series*, Open Anthropology Cooperative Press.

[44] J.A. Adefila and S.M. Opeola, "Supernatural and Herbal Weapons in 19th Century Yoruba Warfare" in AdeagboAkinjogbin, *War and Peace in Yorubaland, 1793-1893* (Ibadan: Heinemann Educational Books, 1998) 25.

[45] Ashanti Kwabena, F., "Blood" in MolefiKete Asante and AmaMazana, *Encyclopedia of African Religion* https://fjcss.fuoye.edu.ng/index.php/fjcss/article/view/9 accessed 12 September 2024.

[46] The Sun, "Murder for Money…Victims of Ritual Murders tell their Stories" (2013) February 17 *The Sun Newspapers* 6.

[47] I. Williams, "Law, Morality and the African Cultural Heritage: The Jurisprudential Significance of the Ogboni Institution" (2005) (14) (2) *Nordic Journal of African Studies* 175-192.

[48] P. John, "Witchcraft, Anti-Witchcraft and Trans-Regional Ritual Innovation in Early Colonial Ghana: Sakrabundi and Aberewa, 1889-1910" (2004) (45) (3) *Journal of African History* 393-420.

[49] B, J. Orde, "Witchcraft and British Colonial Law"(1935) (8) (4) Journal of the InternationalAfrican Institute 481-487.

[50] E. Peter, "Colonialism and the Two Publics in Africa: A Theoretical Statement" (1975) (17) (1) *Comparative Studies in Society and History* 91-112.

[51] H. John, "Witchcraft and Accusations of Witchcraft in South Africa: Ontological Denial and the Suppression of African Justice" (2000) (33) (3) The Comparative and International Law Journal ofSouthern Africa 366-389; Kohnert Dirk, "Witchcraftand Transnational Social Spaces: WitchcraftViolence, Reconciliation and Development in SouthAfrica's Transition Process" (2003) (41) (2)Journal of Modern African Studies 217-245(California: Sage Publications, 2009).

[52] A. Claude, *A Political Economic of Africa* (England: Longman Group Limited, 1981).

[53] A.H. Ekpo and D.A. Omoweh, "Political Economy ofAfrica Security" in R.A. Akindele and E. Ate,Beyond Conflict Resolution: Managing African Securityin the 21st Century (Lagos: NigerianInstitute of International Affairs, 2001) 39.

[54] Reader John, *Africa: A Biography of the Continent* (New York: Vintage Books, 1997).

[55] Madukasi, Francis C. "Cybercrime and Ritualism: The Menace of 'Yahoo Boys' and the Demonization of Traditional Igbo Religion and Society" (2023) (2)(2) *Global Online Journal of Academic Research* 28.

[56] O. Tade and I. Aliyu, "Social Organization of Cybercrime among University Undergraduates in Nigeria" (2021) (16) *International Journal of Cyber Criminology* 460-475.

[57] Punch Newspapers, "EFCC Convicts 1288 Internet Fraudsters", *Punch Newspapers* April 17, 2022.

[58] A. Gaviria, and S. Raphael, "School-Based Peer Effects and Juvenile Behaviour" (2001) (83) (2) *The Review of Economics and Statistics* 257-268.

[59] M. Chawki, "Nigeria Tackles Advanced Fee Fraud"(2009) (4) *Journal of Information, Law andTechnology,* 1-20.

[60] T. Oriola, "Advanced Fee Fraud on the Internet" (2005)(21) *Computer Law and Security Report*241-250.

[61] Sam Ogunlere, MaitanmiOlusola, AyindeSemiu, and AdekunleYinka, "Cybercrimes and Cyber Laws in Nigeria" (2013) (2) (4) *International Journal of Engineering and Science,* 19-25.

[62] O. Agbakoba, "Cybercrimes and Cyber Laws in Nigeria: All You Need to Know" https://www.mondaq.com/nigeria/security/1088292/cybercrimes-and-cyber-laws-in-nigeria-all-you-need-to-know accessed 8 October 2024.

[63] Cybercrimes (Prohibition, Prevention, Etc) Act 2015.

[64] Nigeria National Human Rights Commission, "Criminal Code Act and Witchcraft" https://www.ohchr.org/sites/default/files/documents/issues/women/cfi-witchcraft-hrc52/witchcraft-HRC52-nhri-Nigeria%20National%20Human%20Rights%20Commission.docx#:~:text=The%20Criminal%20Code%20Act%20provides,remains%20connected%20with%20witchcraft%2C%20human accessed 4 October 2024.

[65] S. Oyewole, "Kidnapping for Rituals: Article of Faith and Insecurity in Nigeria" http://www.jpanafrican.org/docs/vol9no9/9.9-Nov-4-Oyewole%20(1).pdf accessed 2nd October 2024.

[66] The Conversation, "Charms and Rituals are Used by Criminals in Nigeria – Should Police Deploy Spiritual Security Too? https://theconversation.com/charms-and-rituals-are-used-by-criminals-in-nigeria-should-police-deploy-spiritual-security-too-211622 accessed 6 October 2024.

[67] Ecoi.net, "Nigeria: Prevalence of Ritual Killing and Human Sacrifice, State Protection (2019 – October 2021)" https://www.ecoi.net/en/document/2066535.html accessed 7 October 2024.

[68] Abdullahi K., Ibrahim, Tawheed A. Adebayo-Onisile, MonsuratIsiaka, Abdulrauf S. Habeeb, Salihu I. Onimajesin, and Tejidin, T. Olayinka, "The Prevalence and theCriminality of Residential Burial Practices in Ibadan,Nigeria" (2022) (1) (2) FUOYE Journal of Criminology and Security Studies 1-16.

[69] Forced Migration Review, "Trafficking, Ritual Oaths and Criminal Investigations" https://www.fmreview.org/issue64/dolsgarcia/ accessed 2 October 2024.