



## Accountability Brief

*A Comparative Analysis of Nigeria and the United States of America*

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# **Police Accountability: A comparative Analysis of Nigeria and the United States of America**

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### **Background and Context**

Provision of security to guarantee the protection of lives, properties, welfare and rights of the citizenry is the primary responsibility of a responsible government (Bakare & Aderinola, 2019). Security is an important element of a state which naturally determines its pace of development and progress. It is an important requirement in the existence or sustenance of every modern state and remains one of the most critical aspects of a nation's existence that ensure social order in society.

While the political philosophies of Locke, Rousseau, and other early modern theorists postulated a hypothetical 'social contract' among individuals to form a society; the term has evolved in contemporary

times to commonly refer to implicitly agreed-upon social arrangements that provide basic security and access to necessities for individuals in modern, industrial societies. Bakare and Aderinola (2019) are of the view that citizens agree in an implied social contract to surrender absolute freedom or sovereignty to the government through electoral legitimacy by obeying laws in exchange for the greater security and prosperity that come from living within an organized society, while government undertakes the protection of their lives and property. Thus, the protection of lives and properties of the people remains the major objective of the government.

However, if the government or any of its agencies fails to protect the

governed, this social contract is eroded, and society could descend into anarchy. This has been the case in many countries around the world especially in Nigeria and the United States of America where this paper would focus due to the unique circumstances of their affected populations. This paper comparatively explores the Nigerian and American police systems with particular reference to issues such as extrajudicial killings, indiscriminate use of force, racism and racial (ethnic) profiling.

It goes further to look at the various responses such as internal accountability processes of police establishments in the US and Nigeria, highlighting the reasons they respond the way they do; and how external accountability mechanisms such as ombudsman, human rights institutions, justice ministries or departments, judiciary, human rights community, media and the general public have tackled public outcries of perceived injustices by police officers.

It then discusses how police reform efforts have fared in the two countries, what can Nigeria learn from these experiences as it strives to implement reform initiatives, and how the country can restrain its coercive institutions and transition to a more humane criminal justice system.

<sup>1</sup> Federal Government of Nigeria (2014). National Security Strategy, November, p.1.

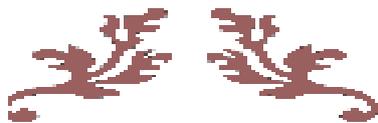
<sup>2</sup> Federal Republic of Nigeria, National Security Strategy November 2014. Abuja: Office of the National Security Adviser (ONSA), p.v

<sup>3</sup> Federal Republic of Nigeria, National Security Strategy, December 2019. Abuja: ONSA, p.v

<sup>4</sup> Federal Government of Nigeria (2019). National Security Strategy, November, p. xvii.

## WIDESPREAD POLICE BRUTALITY AND KILLING

The unnecessary brutalization and killings of civilians by police is both a singular and a serious problem in Nigeria and the United States (US). Police shoot and kill about a thousand civilians each year in the



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United States (Zimring, 2020). While this death toll is far more than in any other fully developed nation, existing empirical evidence suggests that at least half and perhaps as many as 80 per cent of these killings are not necessary to safeguard police or protect other citizens from life-threatening force (Zimring, 2020). In the US, one reason that is usually given for police killing so many civilians is that U.S. police

themselves are vastly more likely than police in other developed nations to die from violent civilian attacks due to the proliferation of concealable handguns throughout the country's social spectrum (Zimring, 2020).

In Nigeria, police have a record of human-rights abuses, brutality, and even extrajudicial killings for the slightest of reasons, such as refusing to give bribes, holding an expensive phone, or driving a fancy car (Egwu, 2020). There have been reports of civilians being extorted, raped, tortured, and killed by police officers, especially the officers who are members of the notorious Special Anti-Robbery Squad (SARS). Amnesty International (n.d.) reports that many victims of these crimes are still waiting for justice because the anti-torture law which was passed by the National Assembly in December 2017 and meant to provide justice is not being fully implemented.

SARS officers are infamous for unlawful killings and torture. Torture and ill-treatment remain

routine practices during SARS' daily operations and at its detention centres. The death of Hamilton Osahenhen Obazee, a father of four children, who was arrested and allegedly tortured to death by SARS officers on 6 March 2020 in Edo state, sparked several demonstrations to demand the end of SARS. The cases of brutality have prompted Nigerians to call for a reform of police through protests and campaigns (Sahara Reporters, 2020). This is just one case of many that tell the story of police brutality in Nigeria. For many years, human rights organizations and the media have documented and reported cases of extrajudicial killing, torture, and other ill-treatment committed by SARS officers.

The advent of COVID19 in Nigeria further exposed the highhandedness of the Nigerian police as local rights groups in April 2020 accused security forces enforcing the lockdown in parts of Nigeria of killing more people at the time than the coronavirus itself (BBC, 2020). The Council on Foreign Relations

also reported that at least 1,476 people were killed by state actors in the country over the past year (BBC, 2020).

In the country's South East, there have been reports of a 'frightening rate of extra-judicial killing of innocent Nigerians' in the area (The Guardian, 2020). On April 15<sup>th</sup> 2020, a 20-year-old man Chukwuebuka was playing football in the street with his friends at Nkpor, a suburb of Onitsha in Anambra State when he was shot dead by the police who were enforcing lockdown rules.

It emerged that a police truck had pulled over to disperse them, but a trigger-happy officer shot the young man when he made his way to run (Egwu, 2020). Justifying the killing, the police said the patrol team acted in self-defence after being provoked and attacked by the young men when they tried to disperse them. But Chukwuebuka's friends who witnessed the shooting alleged there was no provocation (Egwu, 2020).

In a new report, Amnesty International (2020) documents at least 82 cases of torture, ill-treatment and extra-judicial execution by SARS between January 2017 and May 2020. The report shows that the victims of the police unit set up to fight violent crimes are predominantly males between the ages of 18 and 35, from low-income backgrounds and vulnerable groups. Young men with dreadlocks, ripped jeans, tattoos, flashy cars or expensive gadgets are frequently targeted and are often accused of being internet fraudsters and/or armed robbers. Often, these young men are unlawfully arrested in raids on television viewing centres, bars and recreational centres; and are held in detention and forced to pay huge bribes to secure their release. Those unable to pay are subjected to torture or other ill-treatment.

#### FILURE OF ACCOUNTABILITY AND IMPUNITY

One important problem in the governmental control of unnecessary police use of deadly

force is the fact that police officers have been operating with near impunity when efforts are made by citizens or law enforcement to prosecute police officers for criminal misuse of their lethal weapons (Zimring, 2020). The numerous killings of civilians by police officers in the United States each year have in recent history produced about one felony conviction of a uniformed officer per year as the prospects for obtaining felony conviction in the cases are low.

Similarly, in Nigeria, killings of civilians by police officers have resulted in some sort of response by the police organization – most times, the issues are not handled to the satisfaction of the citizens. Findings from the Amnesty International report (2020) on Nigeria show that the horrific violations are usually carried out under the supervision of some senior police officers and that no SARS officer has been held accountable for the well documented human rights violations. Furthermore, many

victims of SARS violations face obstacles and, in some cases, concerted opposition from the police authorities while seeking justice, including threats to their lives.

Despite repeated promises by successive governments to reform the Nigerian Police Force and immediately overhaul of the Special Anti-Robbery Squad, gross human rights violations, inefficiency and disregard for human rights remain widespread within the force. Amnesty International (2020) is of the view that impunity sends the message to torturers that they will get away with any violations. Impunity denies victims and their relatives the right to have the truth established, the right to see justice served and the right to reparations. The human rights watchdog asserts that authorities must go beyond lip service to ensure that there is real reform within the Nigeria Police Force with an emphasis on SARS. These reforms must translate into holding police officers suspected of torture to account, ending torture, unlawful detention, extortion, extrajudicial execution and other

human rights violations that SARS officers have been known for across Nigeria.

Under international law and standards, governments are obliged to bring to justice people who have been identified as having participated in grievous human rights violations such as torture, extrajudicial executions and other unlawful killings. This also applies to superior officers who knew or should have known that their subordinates are resorting or have resorted to the unlawful use of force and firearms, and did not take measures in their power to prevent, suppress or report such use (Amnesty International, 2020).

As has been mentioned above, many victims of SARS' alleged violations face unnecessary difficulties and in some cases, concerted opposition from the police authorities while seeking justice, including threats from SARS officers and their friends if they report their case to the authorities. Most victims are poor and unable to access quality legal

representation; and even when they approach the court, the legal process takes time and requires money. The chances of successfully instituting a criminal prosecution against SARS officers are slim and remote, even for serious cases. The Police Service Commission (PSC) hardly initiates any prosecution of police officers. Rather, it refers complaints by the public back to the police authorities.

In several complaints against SARS reviewed by Amnesty International (2020), there were serious flaws in the way such complaints were treated by the PSC and the police authorities. Some of the complaints to the police authorities were referred to the X-Squad, a unit of the police tasked with investigating police misconduct, for investigation. The process is usually very difficult and daunting as victims are asked to fund the investigation by providing money for travel and accommodation costs during the investigation. In many cases, officers usually demand a percentage of the money recovered from SARS operatives who were accused of

extortion. Even with the passage of the anti-torture law, there is no evidence that any serious steps have been taken to stop the use of torture or to ensure that SARS officers who allegedly perpetrate torture are brought to account. Some of the measures still employed by senior police officers include the transfer of officers accused of torture to other states and the intimidation of victims and their lawyers.

Internally, the Nigeria Police created several mechanisms to regulate the conduct of its officers and men. The public is supposed to report misconduct by the police to the Police Complaints Bureau, an internal investigation unit established in 2003. The Bureau is supposed to have an office in each police station and complaints against the police are reviewed by the 'Orderly Room Trial', an additional and separate mechanism and internal police review mechanism mandated to recommend disciplinary action against any erring police officer if there is evidence of professional

misconduct. However, being an internal body based on peer review by colleagues, it lacks the independence and impartiality required to be an effective oversight measure (Amnesty International, 2020).

The Nigeria Police also set up a human rights desk in police commands across the country. However, it is unclear if the human rights desks have had any impact on reducing human rights violations by the security forces; and there are usually complaints by citizens of being unable to access the services of the human rights desks. In November 2015, the police authorities launched the Complaint Response Unit (CRU) to process complaints from the public. However, the Unit has not been able to follow through with prosecution against a single SARS officer for torture.

The Police Service Commission (PSC) was set up by the Federal Government and is empowered to “appoint, promote, discipline and

dismiss all officers of the Nigeria Police Force (NPF) except the Inspector-General of Police (IGP)”. Also, it has the power to formulate policies and guidelines concerning appointment, promotion and discipline of officers in the NPF. The PSC, however, cannot refer cases to the courts for prosecution. Complaints made to the PSC are referred back to the police for further investigation.

Furthermore, the National Human Rights Commission (NHRC) on 13<sup>th</sup> June 2018 announced that it had been approved to audit the detention facilities of the police, including SARS. The Commission said the audit would help them oversee the human rights situation in the country. But the Commission was yet to make its findings public as at the end of May 2020. These mechanisms, in theory, could potentially regulate the conduct of police officers and ensure that officers accused of misconduct including torture are brought to book. However, the reality is that

perpetrators are rarely held to account.

In the United States, a new study from the University of Chicago found that police in America's biggest cities are failing to meet even the most basic international human rights standards governing the use of lethal force, stating that not one police department in the 20 largest American cities operates under guidelines compliant with minimum standards laid out under international rights laws (Pilkington, 2020).

Among the failings identified by the law scholars, some police forces violate the requirement that lethal force should only be wielded when facing an immediate threat and as a last resort. Some departments allow deadly responses in cases of "escaping suspects", "fugitives", or "prevention of crime" – all scenarios that would be deemed to fall well outside the boundaries set by

international law (Pilkington, 2020). In other cities, police guidelines failed to constrain officers to use only as much force as is proportionate to the threat confronting them.

The study found that America's biggest police forces lack legality because they are not answerable to human rights compliant laws authorizing the use of lethal force. The study concluded that too much deadly discretion is given to

police officers in the US; as the use of force is a form of "state-sanctioned violence" that society only grants police officers as part of their responsibility "to protect public safety and enforce the law when necessary" (Pilkington, 2020). The researchers remarked that the lax framework of US policing has contributed to the spate of police killings of unarmed black people. The need for restrictions on police power has been recognized in international law for 40 years. Two



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basic human rights are involved: the right to life and personal security, and the right to freedom from discrimination. Those rights have also been enshrined in core United Nations standards. All 193 member nations of the UN, including Nigeria and the US, have signed up to a code of conduct for law enforcement officials adopted in 1979. Recent deaths in police custody have underlined the fatal results of officers applying lethal force in situations that do not conform to “last resort”. George Floyd died after he was pinned down under an officer’s knee for 8 minutes and 46 seconds, though he had not appeared to resist arrest.

When things go wrong, the Chicago study also found that the police use-of-force policies fall woefully short on accountability. All 20 city forces were found to have internal systems for reporting the deployment of lethal force, but only two; Los Angeles and Chicago that require independent external investigations to be carried out in tune with international standards. Houston,

San Antonio, San Diego, Austin, Indianapolis, Charlotte, Seattle and El Paso had no external reporting requirements.

### **#BlackLivesMatter and #NigerianLivesMatter**

Recent weeks saw protests across Africa, including in Nigeria, in solidarity with the Black Lives Matter movement happening in the United States that later snowballed across major cities around the world. These protests have been matched with powerful government statements across Africa.; but while the killing of George Floyd, who died when a white Minneapolis police officer knelt on his neck for eight minutes and 46 seconds, has stirred rightful outrage and cries for justice, no one in other countries has sought justice for Chukwuebuka and others killed through police brutality both before and during the lockdown in Nigeria.

While a few friends and youth groups in the area defied the lockdown restrictions to protest the killing, it was ultimately only a brief

flicker which merely lasted for a day before life returned to normal as in many other cases across the country. There was no national outrage or calls for independent inquiry and reforms, no mass protests or global solidarity worldwide. This shows the level and sanctity of life in Nigeria compared to the rest of the world.

Whenever anyone is killed by the police in Nigeria, elaborate hashtag activism for justice trends for some days before everything returns to normal and life continues. There are usually no street protests demanding justice or the prosecution of the killers; while the police and other security actors carry on as before.

Following the killing of Floyd, the Nigerians in Diaspora Commission, a government agency that provides engagement and protects the welfare of Nigerians abroad, officially held a solidarity rally and memorial service to protest the killing and called for justice stating that the gathering was against violence, brutality and racial discrimination as per Abike Dabiri-Erewa, the head of the commission. The Commission called for respect

and dignity for all races stating among other things that “never again should we be made to witness what we saw on the streets of Minneapolis, the slow murder of an individual by a uniformed police officer.”

But there has never been any memorial service by any government agency for the hundreds of Nigerians killed through police brutality over the years in Nigeria. Nigerians and Africans at large must start caring about the lives of black people at home first. Egwu (2020) opines that when the lives of black people in Africa are taken indiscriminately, the rest of the world then thinks that it is okay to do so as well. A situation where we express outrage over the death of Floyd in America but keep silent on the killing of Nigerians or other individuals back home is ludicrous.

Although police brutality and COVID-19 are separate tragedies, happenings of the past few months in America show that they intersect. A country held hostage by Covid-19

for over two months swiftly turned its attention to a much older public health crisis: police brutality, and the conditions that enable it to thrive. As with COVID-19, the killing of citizens at the hands of police is higher among black people than the overall U.S. population (Resnick, 2020).

The American Medical Association wrote that excessive police force is communal violence that significantly drives unnecessary and costly injury, and premature morbidity and death (Merelli, 2020). The association described police brutality as both prevalent and pervasive and directly linked to the legacy of racism in the US. Similarly, research by the American Public Health Association (APHA) showed that excessive use of force by the police which is overwhelmingly directed towards Black people and other disadvantaged communities results not just in death, but has other long-term public health consequences, too. The APHA further notes that this cost is overwhelmingly sustained by Black communities by design, as US

policing was created as a form of control of communities considered marginal, particularly on racial grounds, and continues to operate accordingly (Merelli, 2020).

Many US activists and protestors have been advocating for policies that would bring less power to the institution of law enforcement and more power to the people who currently live in over-policed communities. Proposals to defund the institution of law enforcement emphasize identifying ways the police are abusing certain resources, reducing their budgets, and reallocating funds back into the communities in which they patrol. This includes enhancing funding to strengthen institutions that can help to reduce crime in the long and short term such as education, housing, mental health treatment etc. (Resnick, 2020).

Going beyond these proposals, Resnick (2020) suggests a complete redefinition of the role of police in communities. Instead of having one standardized number to call for every emergency, there should be a

ranking of the type of emergency, ranging from immediate/life-threatening to a civil dispute that could be handled without law enforcement.

### THE HAZARDS OF FEDERALISM IN THE MANAGEMENT OF POLICE DEADLY FORCE

The American federal system is both unique in its structure and division of responsibilities and non-comprehensive in its design when compared to other nations including Nigeria. Zimring (2020) states that the US federal government has a very small share of non-military police, excluding specialized security personnel at airports and borders. The Federal Bureau of Investigation (FBI) employs thirty thousand or so of the nation's six hundred thousand police, and the Drug Enforcement Administration (DEA) has about four thousand agents (Zimring, 2020).

If most criminal law and criminal punishment is a creature of the state governments, police functions and accountability are dominated by two much smaller levels of local

government, municipalities for police agencies and county-level government, typically with larger areas and populations for sheriffs' offices and local jails. The question then arises of which of these levels of government are responsible for regulating the police use of deadly force.

The prosecution of police conduct in criminal courts is usually the responsibility of local prosecutors and county government officials who also depend on local police to provide suspects and evidence; while the training, promotion, discipline over, and discharge of police officers is the responsibility of municipal police departments (for police) and county sheriffs (for sheriffs) (Zimring, 2020).

In essence, besides the enormous power wielded by the federal government through federal agencies such as the FBI, the next tier of government with the power to ensure good police conduct and accountability is the local or municipal authorities. The limited authority of state governments in

police matters rather naturally leads to this tier of government having little expertise about or influence on the conduct of local law enforcement. (Zimring, 2020).

The larger problems generated by the incapacity of state government in police regulation are sins of complete omission, rather than mere weaknesses in well-intended efforts at reporting influence and control. Every state in the US federal structure has an attorney general with some claim to statewide leadership in the administration of criminal law, but no state government has either the authority or the desire to regulate or evaluate the mission or behaviour of municipal police or county sheriffs. With about eighteen thousand different police agencies operating independently, there are also very few departments with the size, expertise and specialized personnel to research the impact of various police activities.

Zimring (2020) asserts that the power and expertise voids that govern the current ignorance and

overkill in police use of deadly force in the US are direct if unintended consequence of state and federal government failures to assert authority over the use of lethal force by law enforcement. Individual police departments lack the resources, motivation, and competence to conduct empirical research and to evaluate police programs.

The state governments that control most criminal justice policy in the US are less involved with police and policing than with most other aspects of crime. There are, however, a few areas of governmental responsibility where the distance between the state government and policing administration may be an advantage, such as taking responsibility out of the hands of local prosecutors when police use of lethal force becomes an issue of potential criminal liability.

## CONCLUSION AND RECOMMENDATIONS

In policing, people always talk about “bad apples”. However, Ray (2020) is of the view that bad apples come from rotten trees—law enforcement agencies imbued with structural racism, tribalism, corruption, impunity etc. Structural changes are desperately needed in law enforcement and many people think they should start with restructuring civilian payouts for police misconduct.

As the Amnesty International report (2020) has shown, hundreds of young men are subjected to torture and other forms of ill-treatment by SARS officers across Nigeria. In the great majority of cases, there are no investigations into these crimes and no one is prosecuted for them. Torture is committed with impunity, and impunity sends the torturers the message that they can get away with rights violations. Impunity also denies the victims and their relatives the right to have the truth established, the right to see justice served and the right to reparations. It is high time the Nigerian government took a solid stand against impunity by SARS, by

ensuring that all police officers are made accountable for their actions.

To fundamentally solve police brutality, the roots of metaphorical rotten trees within law enforcement ought to be replanted. To deal with rotten roots, the “above the law” mentality of officers has to be done away with; the fact that fear is used as an excuse to enact force, and invoking *esprit de corps* wall of silence that extends from police departments to prosecutor’s offices and courtrooms.

Our policy recommendation is to restructure the ways civilians can report erring police officers for misconduct and avenues to seek relief. This restructuring will allow for police chiefs to better identify bad apples and justify their removal, as bad apples should not be allowed to proliferate and spread to other trees. Officers found to have committed any serious misconduct should be fired immediately. While being fired instantly sends a clear message about accountability, this should be commonplace in a country

that ought to treat every human life like it matters.

To bring about genuine reform and improve police services to bring an end to police brutality and other human rights violations, Nigeria's federal government must: bring perpetrators of human rights violations to justice; ensure that all police officers, including SARS officers, receive training based on human rights standards-compliant practices; reform codes and regulations concerning the functioning of the police to bring them in line with international standards; enforce the Anti-Torture Act; empower the Police Service Commission (PSC) to carry out its oversight function of the police, including SARS; and ensure that the police cooperate with NGOs that monitor the police.

The Police Service Commission (PSC) should also ensure that all allegations of serious violations of human rights by officers, including extrajudicial executions and torture, and all instances where there are reasonable grounds to believe, even

without a complaint from the public, that such violations have taken place, are investigated thoroughly, per the powers contained in the Police Service Commission Act.

The Nigerian Police Force (NPF) should endeavour to open up SARS facilities for inspection and monitoring by relevant agencies such as the NHRC, PSC, National Committee against Torture (NCAT) and NGOs, and ensure that they have unhindered access. They should also ensure that all police interviews are recorded, preferably by audio and video, and must be conducted in the presence of lawyers for the suspect, in line with the provision of the Administration of Criminal Justice Act (ACJA) 2015. Officers should be instructed that arrests and detention must be carried out in strict accordance with approved practices, and the approved practices must be designed in conformity with international law and standards starting with the reading of the Miranda rights.

The NPF should ensure that lawyers and doctors have prompt and regular access to detainees. They should ensure that police stations record the name of the suspect, the time of arrest, the reasons for arrest, precise information identifying the place of custody and the identity of the law enforcement officials concerned. Any complaints of torture or other ill-treatment must be registered and newly arrested persons must be examined by a medical practitioner, including examinations for any signs of torture or other ill-treatment.

Furthermore, anyone arrested by officers should be brought before a judge within the Constitutional period of 24 or 48 hours; and immediate disciplinary measures should be taken against all officers who are involved in torture or other ill-treatment. They should be removed from any position of control or power over complainants and suspended from active duty during the investigation and pending criminal prosecution. Disciplinary measures must not

replace criminal investigations and prosecution. Finally, officers should be trained and educated on human rights compliant practices.

## References

- Amnesty International (n.d.). Demand Justice for Police Brutality in Nigeria. Retrieved from <https://www.amnesty.org/en/get-involved/take-action/nigeria-end-impunity-for-police-brutality-end-sars/>
- Amnesty International (2020, June 26). Nigeria: Horrific Reign of Impunity by SARS Makes Mockery of Anti-Torture Law. Retrieved from <https://www.amnesty.org/en/latest/news/2020/06/nigeria-horrific-reign-of-impunity-by-sars-makes-mockery-of-anti-torture-law/>
- Amnesty International (2020, June 26). Nigeria: Time to End Impunity, Torture and Other Human Rights Violations by Special Anti-Robbery Squad (SARS). Retrieved from <https://www.amnesty.org/en/documents/afr44/9505/2020/en/>
- Ayuk, A., Omang, T. A., & Igwe-Okomiso, J. B. (2020). Nigeria police and hundred naira syndrome: corruption discourse. *Journal of the Social Sciences*, 48(2). Retrieved from <http://apcjss.com/assets/uploads/doc/f3c02-1017-1030.21240.pdf>
- Bakare, A. R., & Aderinola, G. T. (2019). The Nigeria Police and Internal Security Management in Nigeria. In *Internal Security Management in Nigeria* (pp. 461-483). Palgrave Macmillan, Singapore. Retrieved from [https://www.researchgate.net/profile/Ikenna\\_Alumona/publication/334642619\\_Environmental\\_Insecurity\\_in\\_Nigeria/links/5e964538299bf130799ac355/Environmental-Insecurity-in-Nigeria.pdf#page=474](https://www.researchgate.net/profile/Ikenna_Alumona/publication/334642619_Environmental_Insecurity_in_Nigeria/links/5e964538299bf130799ac355/Environmental-Insecurity-in-Nigeria.pdf#page=474)
- BBC (2020, April 16). Coronavirus: Security forces kill more Nigerians than Covid-19. Retrieved from <https://www.bbc.com/news/world-africa-52317196>
- Egwu, P. (2020, June 17). As the World Marches for American Victims, Police Brutality in Africa Goes Unnoticed. Retrieved from <https://foreignpolicy.com/2020/06/17/black-lives-matter-protests-africa-police-brutality/>
- Jean, T. (2020). Black Lives Matter: Police Brutality in the Era of COVID-19. Retrieved from <https://lernercenter.syr.edu/wp-content/uploads/2020/06/Jean.pdf>

- Magaloni, B., & Rodriguez, L. (2020). Institutionalized Police Brutality: Torture, the Militarization of Security and the Reform of Inquisitorial Criminal Justice in Mexico. Retrieved from [http://povgov.com/storage/uploads/publication\\_files/institutionalized-police-brutality-torture-the-militarization-of-security-and-the-reform-of-inquisitorial-justice-in-mexico-forthcoming-at-the-american-political-science-review\\_1591288707.pdf](http://povgov.com/storage/uploads/publication_files/institutionalized-police-brutality-torture-the-militarization-of-security-and-the-reform-of-inquisitorial-justice-in-mexico-forthcoming-at-the-american-political-science-review_1591288707.pdf)
- Merelli, A. (2020, June 1). Black people are at the center of two public health crises in the US: Covid-19 and police brutality. Retrieved from <https://qz.com/1862403/black-people-are-at-the-center-of-two-public-health-crises-in-the-us-covid-19-and-police-brutality/>
- Pilkington, E. (2020, June22). ‘State-sanctioned violence’: US police fail to meet basic human rights standards. Retrieved from <https://www.theguardian.com/us-news/2020/jun/22/us-police-human-rights-standards-report>
- Ray, R. (2020, May 30). Bad apples come from rotten trees in policing. Retrieved from <https://www.brookings.edu/blog/how-we-rise/2020/05/30/bad-apples-come-from-rotten-trees-in-policing/>
- Resnick, B. (2020, June). “Police brutality is a public health crisis.” Retrieved from <https://www.vox.com/science-and-health/2020/6/1/21276828/pandemic-protests-policepublic-health-black-lives-matter>
- Sahara Reporters (2020, June 9). Civil Rights Coalition Protests Death of Man Unlawfully Arrested and Killed By SARS in Edo State. Retrieved from <http://saharareporters.com/2020/06/09/civil-rights-coalition-protests-death-man-unlawfully-arrested-and-killed-sars-edo-state>
- The Guardian (2020, April 19). COVID-19: Abaribe kicks against police brutality, killings in South East. Retrieved from <https://guardian.ng/news/covid-19-abaribe-kicks-against-police-brutality-killings-in-south-east/>
- Zimring, F. E. (2020). Police killings as a problem of governance. *The ANNALS of the American Academy of Political and Social Science*, 687(1), 114-123. Retrieved from <https://journals.sagepub.com/doi/full/10.1177/0002716219888627>

