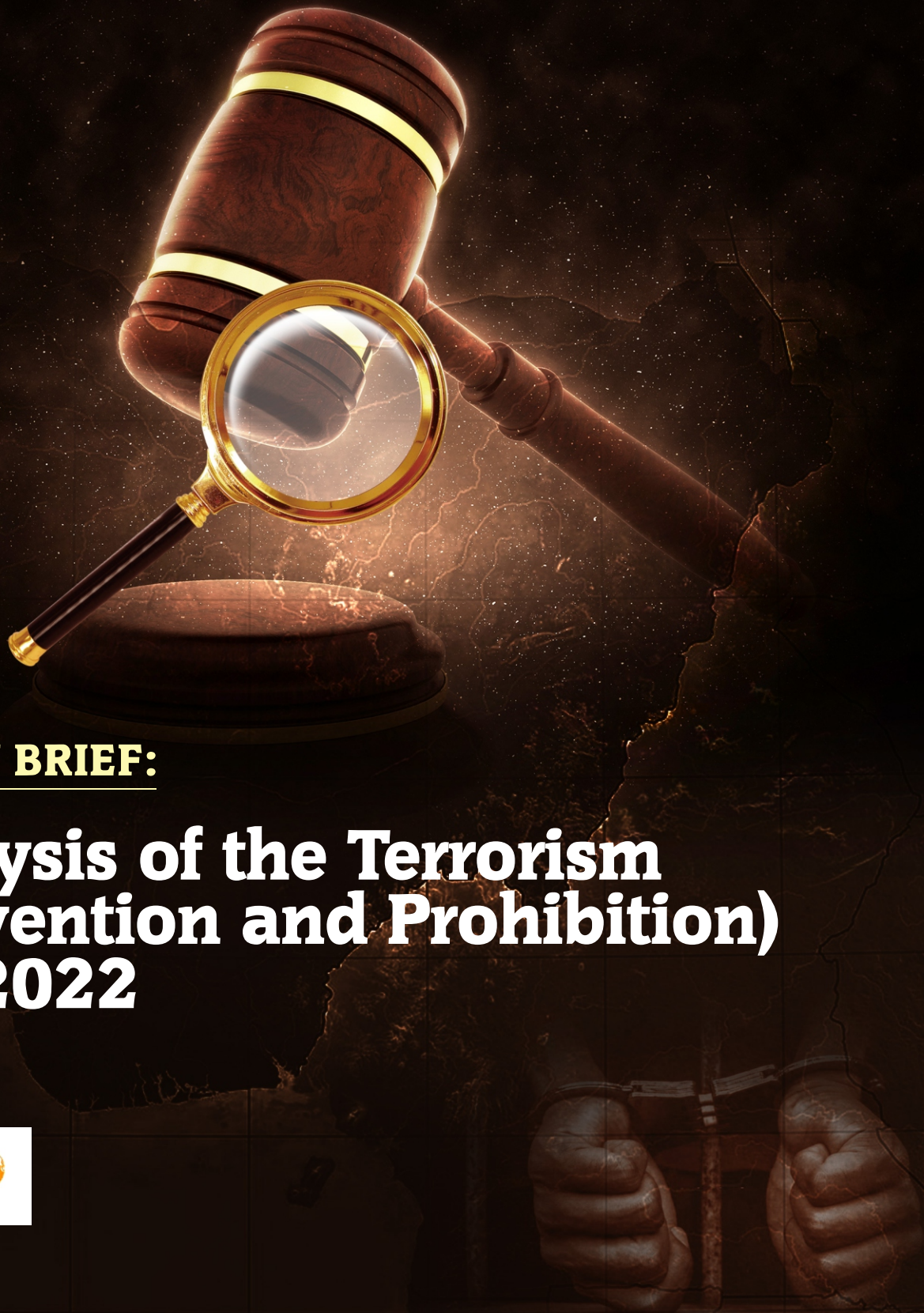




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## POLICY BRIEF:

# Analysis of the Terrorism (Prevention and Prohibition) Act 2022

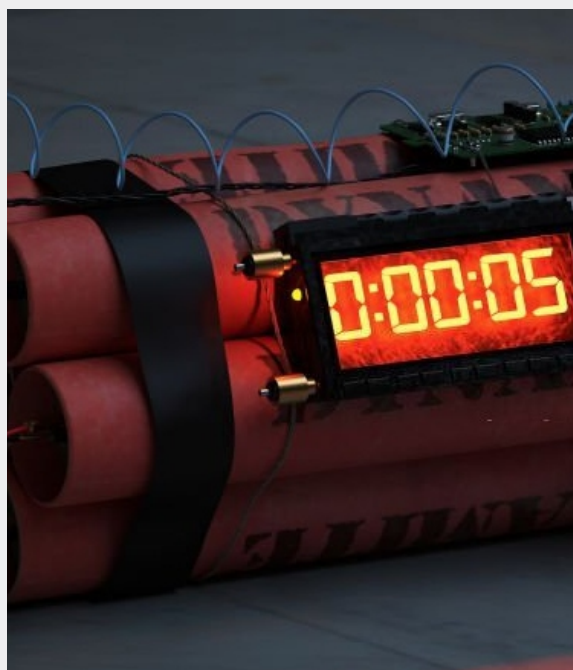
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# PROTECTING HUMAN RIGHTS & CIVIC SPACE WHILE COUNTERING TERRORISM IN NIGERIA

## Introduction

Terrorism is an existential threat all over the world. In Nigeria, national consciousness about this global threat sprang from the August 2011 suicide car bombing at the United Nations headquarters in the Federal Capital Territory, Abuja, necessitating the strengthening of the legal architecture for combating terrorism. In May 2022, President Muhammadu Buhari assented to the Terrorism (Prevention and Prohibition) Act 2022 (“TPA 2022”) which repealed the former anti-terrorism legislation—Terrorism (Prevention) Act No. 10, 2011—which was amended in 2013.

This review highlights the innovations in the new law central to the maintenance of public order while simultaneously interrogating the effectiveness of procedural safeguards and the conditions for balancing libertarian freedoms with national security objectives. It proposes constructive alternatives for ensuring that the norms built on the rhetoric of countering terrorism strike a healthy balance with the protection of human rights, civil society, and the civic space in general.



## HIGHLIGHTS OF TPA 2022

- Divided into XVII parts, TPA 2022 is a comprehensive legal, regulatory and institutional framework for the detection, prevention, prohibition, prosecution and punishment of acts of terrorism, terrorism financing, proliferation and financing the proliferation of weapons of mass destruction in Nigeria;
- Defines terrorism and grants courts extra territorial jurisdiction on matters of terrorism, coupled with the stipulation of measures for the detention, freezing, search and seizure, confiscation, forfeiture of terrorist property; and compensation of victims of acts of terrorism;
- Provides mechanisms for the implementation of financial measures arising from counter-proliferation resolutions in line with Article 41 of the Charter of the United Nations; regional and international counterterrorism conventions and other agreements for combating terrorism, terrorism financing and related offences;
- Expand the definition of terrorism financing. It transcends financial support to terrorist groups, but now encompasses the provision, soliciting, acquiring, collecting, receiving, possessing, or making available property, funds or other services with the intention or knowledge that it will be used, in full or in part to finance a terrorist or terrorist group;
- Spells out terrorism designation and proscription procedures for the declaration of a person or entity as a terrorist or terrorist entity, or terrorism financier;
- Prescribes measures for countering the financing of terrorism, including the establishment of mechanisms for reporting suspected incidents of financial and other support for terrorist entities.



# PROVISIONS CENTRAL TO THE MAINTENANCE OF PUBLIC ORDER AND DEMOCRATIC SOCIETY

## 1. Definition of Terrorism and Assembly Rights Exemption

Before now, there was no clear definition of “terrorism”. TPA 2022 attempts to address the problem of definitional uncertainty by defining the term, “terrorism”, in very broad and descriptive terms.<sup>1</sup> The definition covers a variety of criminal acts against a country, or an international organization willfully performed with the intention of furthering an ideology, whether political, religious, racial, or ethnic. It includes acts which may seriously intimidate the population, or seriously harm, damage, destabilise or destroy the fundamental political, constitutional, economic, or social structures of a country or an international organization, in violation of the provisions of any international treaty or resolution to which Nigeria is a party. Among other things, the definition further extends to acts:

- involving kidnapping, death or grievous bodily harm, seizure or diversion of an aircraft, ship, or other means of public transport, destruction of government or public facility and other national critical information infrastructure;
- involving the manufacture, possession, acquisition, transportation, transfer, supply or use of weapons, including explosives or biological, chemical, radiological or nuclear weapons (BCRN weapons), nuclear or other radioactive material or devices as well as research into and development of BCRN weapons without lawful authority;
- engaging in acts likely to endanger the safety of an aircraft, ship, train or any other means of transportation, which includes bombing and other acts of violence at airports and other public places;
- acts prejudicial to national security or public safety, not limited to the propagation and dissemination of information in any form or mode calculated to cause panic, or intimidate a government, person, or group of persons, or cause major disruptions to essential emergency services, computer systems or public service delivery.

From the above, while acts that cause major disruptions are prohibited, TPA 2022 exempts the stoppage of work or disruptive acts committed in pursuance of a protest or demonstration subject to certain conditions. In other words, the Act recognizes citizens' right to protest, subsumed under the tripartite rights to free expression, assembly, and association. This exemption aligns with the constitutional recognition of these freedoms as essential components of a democratic society. Any limitations or derogations placed on these freedoms must satisfy certain conditions and must be reasonably justifiable.<sup>2</sup>

## 2. Coordination of Law Enforcement and Clarity of Agency Roles

Part II of the Act provides a coordinating mechanism for the implementation of the Act and clarifies the roles of key stakeholders. Since terrorism is a federal crime, prosecutorial powers are vested in the Attorney-General of the Federation (AGF) while counterterrorism policymaking responsibilities is conferred on the Office of the National Security Adviser (ONSA). Law enforcement and security agencies will carry on their investigative and intelligence-gathering responsibilities, but are empowered to partner with civil society organisations (CSOs) and the Nigerian public to provide necessary education, support, information, awareness, and sensitization towards the prevention and elimination of acts of terrorism, terrorism financing and proliferation and proliferation financing.

TPA also establishes<sup>3</sup> the National Counter Terrorism Centre (NCTC) which acts as an incubator of counterterrorism policies, strategies, and plans. The NCTC supports the ONSA in the performance of its functions and is further obligated to establish a Joint Terrorism and Analysis Branch which will serve as a fusion centre responsible for terrorism research, analysis and intelligence support to law enforcement and security agencies. As with law enforcement and security agencies, NCTC is obligated to partner with

1. Section 2 of TPA

2. See. Section 45(2) of the 1999 Nigerian Constitution. See also Victoria Ibezim-Ohaeri, [‘COVID-19: The Legality And Limits Of The Presidents Emergency Powers](#)

3. Section 6 of the TPA 2022



civil society and international organizations in the prevention and countering of violent extremism, terrorism and terrorism financing. This role clarification represents a departure from the previous practice where overlapping roles among law enforcement agencies caused regulatory confusion. Unlike the older order when ONSA rendered merely advisory services to the President, TPA 2022 closed this gap by prescribing statutory executive functions for that office. Most importantly, the new law recognizes the importance of collaborative efforts between government and civil society, underlining the important contributions of civil society in the war against terror.

### **3. The Designation Procedure and the Nigeria Sanctions Committee**

The AGF is responsible for constituting the Nigeria Sanctions Committee comprising the heads of a diversity of law enforcement agencies and financial institutions. The Committee is empowered to formulate and provide general policy guidelines on designations made under the Act and to advise on the effective implementation of the United Nations Security Council Resolutions related to terrorism financing and proliferation financing, and allied instruments of the African Union and the Economic Community of West African States. The new procedure for the designation of entities empowers the AGF, with the approval of the President, to apply ex-parte to the Court to proscribe the person, association or the entity, and the notice of the Proscription Order shall be published in the Federal Government Gazette and in two national daily newspapers.<sup>4</sup>

Among other things, the Committee can recommend to the AGF the appropriate sanctions that apply to designated entities such as travel ban, freezing of funds and assets, and other economic interests of persons and entities designated under the United Nations Consolidated List or under the Nigeria List. The Committee is required to maintain a website where all related changes and updates to the United Nations Consolidated List and the Nigeria List shall be posted and updated regularly. The Sanctions Committee operates both as a clearing house for terrorism designation decision-making and a mechanism for facilitating regular interactions between national authorities responsible for combating terrorism. In addition, clearly setting out the rules for determining the legality of the designation process makes it easy to identify persons/entities that have been designated and equally ascertain whether the appropriate procedure



and criteria have been duly followed to proscribe them. Designated entities can also seek the revocation of designation, de-listing and unfreezing of funds or other assets, using the procedure spelt out in Section 55 of the TPA. In other words, TPA creates a procedure for challenging and upturning designations made under the Act.

### **4. The Deterrent Effects of Designation**

Once the Sanctions Committee determines that a person or an entity has committed, attempted to commit, participated in committing, instigated the commission, or facilitated the commission of an act of terrorism or terrorism financing, very harsh sanctions apply. Deterrence, public safety and national security are the major reasons for the application of harsh sanctions and restrictions on designated persons. The sanctions include:

- Adding the name of the designated person or entities to the Nigeria Sanctions List, which is disseminated to the relevant authorities for action.
- Designation may be accompanied with a revocation of citizenship published by the AGF in the Federal Government Gazette.
- The government may request the United Nations Security Council or its relevant Committees to also designate that person, group, or an entity as an international terrorist, terrorist group, terrorist entity, or terrorist financier.
- Once the designation is included in the Nigeria Sanctions List, all natural and legal persons in Nigeria, including financial institutions, designated non-financial business and professions, and other entities in Nigeria shall immediately, identify and freeze, without prior notice, all funds, assets, and any other economic resources belonging to the designated person or entity in their possession.

4. Section 48 of the TPA



- Sector regulators will impose administrative sanctions against a financial institution, designated non-financial business and professions, and other entities in breach of immediate freezing obligation and rules against tipping off.

### **5. Prohibition of Ransom Payment**

Terrorists tend to generate funds by engaging in conventional crimes such as bank robberies, kidnapping, syndicated car snatching, and so forth.<sup>5</sup> To curb the menace of kidnapping by terrorists, the Act<sup>6</sup> criminalizes the demand and giving of ransom. Kidnapping involves threatening to kill or injure, seizing and detaining a person, property, or facility in order to compel a third party to do or abstain from doing a lawful act, or gives an explicit or implicit condition for the release of the person held hostage, or the property or facility detained. By this provision, families and friends of kidnap victims are prohibited from paying ransoms to kidnappers for the release of any person held captive. Outlawing the payment of ransom to kidnappers and terrorists complements the Federal Government's efforts in stemming the tide of insecurity in the country.<sup>7</sup>



### **6. Compensation for Victims**

Most victims of terrorism are innocent citizens who find themselves at the wrong place and at the wrong time, randomly targeted in brutal attacks.<sup>8</sup> The National Counter Terrorism Strategy, 2016, makes compensation arrangements for victims of terrorism, but this did not have a statutory backing. The TPA 2022 now provides a statutory framework for compensating victims of terrorism through the establishment of the Victims Trust Fund and the Special Victims Trust Fund Committee to oversee the funds' administration. Two Committee members are

are to be drawn from the non-governmental organizations. Beyond providing a legal backing for paying compensation, restitution and damages to victims of acts of terrorism, these provisions provide them with rights and access to justice and redress mechanisms. Victims, in this context, means individuals, entities or communities or their next-of-kin who are directly affected, killed or injured or whose business, premises or infrastructure was destroyed by acts of terrorism or by a direct effect of a terrorist attack. The provision for compensation aligns with the United Nations Global Counter-Terrorism Strategy which encourages the establishment, strengthening and expansion of funds for compensation or reimbursement to victims.<sup>9</sup> The inclusion of civil society in the administration of the compensatory mechanisms demonstrate a commitment to the whole-of-society

### **7. Non-profit Organizations Delisted from DNFBPs**

Nonprofit organizations (NPOs) are no longer considered to be designated non-financial businesses and professions (DNFBPs) under the 2022 TPA. This implies that NPOs are exempt from the onerous reporting requirements set forth in Part XIII. The delisting of NPOs is consistent with the provisions of the Money Laundering (Prohibition) Act and comes years after sustained advocacy by civil rights groups challenging the official classification of NPOs as designated non-financial institutions (DNFIs).<sup>10</sup> NPOs are ill-suited to carry out the type of rigorous due diligence initiatives prescribed under this law. Requiring NPOs to assess the risk profiles, transaction history, existing records and keep up-to-date records of the beneficiaries' data will not just be extremely onerous, but also will force NPOs to totally deviate from their core charitable and humanitarian mandates and venture into investigative and undercover missions mainly reserved for security agencies and financial institutions.<sup>11</sup> The delisting of NPOs from the DNFBP category represents a bold step toward enforcing counterterrorism measures without unduly disrupting or discouraging legitimate NPO activities in Nigeria.

5. National Financial Intelligence Unit (NFIU) [National Inherent Risk Assessment of Terrorist Financing in Nigeria](#)

6. Section 24 of the TPA

7. [The Nation: Ransom payment: Jail or death?](#)

8. [United Nations Office of Drugs and Crimes \(UNODC\) Victims of Terrorism](#)

9. [The United Nations Global Counter-Terrorism Strategy, Resolution adopted by the General Assembly on 22 June 2023](#)

10. SPACES FOR CHANGE: [Unpacking the Official Construction of Risks and Vulnerabilities for the Third Sector in Nigeria, March 2019](#)

11. Spaces for Change, [POLICY BRIEF: MONEY LAUNDERING \(PREVENTION AND PROHIBITION\) ACT, 2022 & NON-PROFITS IN NIGERIA, May 2022](#)



## BRIDGING THE GAPS BETWEEN HUMAN RIGHTS AND COUNTER TERRORISM MEASURES

Although anti-terrorism laws are drafted to be tough and deter criminal behaviour, they must be humane and not endanger human rights. The gaps between human rights and national counterterrorism objectives are better understood by placing the TPA 2022 side-by-side with salient constitutional provisions, other national laws, regional and international human rights treaties that Nigeria has ratified. The following provisions are of particular concern.

### 1. Overly Broad Definition of Terrorism Can Harm Human Rights

The definition of 'terrorism acts' is too wide, creating a very wide net of offences attracting very heavy sanctions. Most offences classified as terrorist acts have already been criminalized under extant criminal and penal codes in the country. What happened is that the same set of offenses criminalized under pre-existing criminal codes are re-criminalized in national terrorism legislations,<sup>12</sup> vesting a wider discretion on the law enforcement agencies to cherry-pick which law to invoke to justify terrorist charges.<sup>13</sup>

Overbroad definitions almost always trigger overbroad interpretation of anti-terrorism legislation in ways that violate human rights. Section 2 (3) (g) (xiii) criminalizes acts which involves, causes, or results in the propagation and dissemination of information or information materials in any form or mode calculated to cause panic, evoke violence, or intimidate a government, person, or group of persons. Important safeguards are necessary to ensure that the broad language of this provision is not exploited to restrict free speech and shrink the civic space. Recent documentations on a digital database of civic space crackdowns in West Africa<sup>14</sup> and an independent report provide ample evidence

of the misuse and overbroad interpretation of anti-terrorism laws to target dissenting groups or people who criticize government actions, or demand good governance, among other things.<sup>15</sup>

The expanded definition of terrorism financing gives room to misconstrue different types of service delivery rendered by a diversity of groups, professional bodies, and civic organizations. Where incorrectly applied, Section 21 of the TPA may be invoked to justify forced closures or indiscriminate legal action against humanitarian organizations that provide aid and render services to persons in terrorist-ravaged areas, consistent with the principles of neutrality and impartiality. When counterterrorism measures are enforced like this, it can potentially disrupt legitimate charitable operations and prevent help from reaching those in critical need.

Finally, significant gaps between the policy and practice of protest exemptions exist. There is evidence that this exemption has not prevented state actors from retaliating against protesters or individuals demonstrating peacefully against unpopular government policies or actions. In 2020, the Central Bank of Nigeria (CBN) froze accounts belonging to #EndSARS protesters<sup>16</sup> on the suspicion that the account holders have used their bank accounts to "finance terrorism." Peaceful assemblies criminalized in this manner represents an imbalance between counterterrorism measures and civil liberties, and taints peaceful agitations with the same brush used to characterize serious security breaches and felonies.

12. Spaces for Change: '[S4Cs Remarks At UNOCT Malaga Conference: UN High-Level International Conference On Human Rights, Civil Society & Counter-Terrorism](#)

13. Action Group on Free Civic Space, [NIGERIA: SHRINKING CIVIC SPACE IN THE NAME OF SECURITY](#)

14. [www.closingspaces.org](#)

15. Action Group on Free Civic Space, [NIGERIA: SHRINKING CIVIC SPACE IN THE NAME OF SECURITY](#)

16. Spaces for Change, [2021, #EndSARS: Police Brutality, Protest and Shrinking Civic Space in Nigeria; Closing Spaces Database, 2020, 'Court Grants CBNs Request To Freeze Accounts Of 19 #EndSARS Protesters,](#)

Accessed on Jul 11, 2023



## 2. Due Process Concerns

Due process concerns have been raised with regard to several provisions of the Act, especially those relating to the procedures for designation, asset seizure and the revocation of certificates for non-profit organizations (NPOs) suspected of affiliation with terrorist groups. The way entities are designated coupled with the review or appeal procedures are not subject to public, legislative or judicial scrutiny, raising serious accountability issues and high prospects for violating fundamental human rights norms.

Only the AGF, with the approval of the President, can make an *ex parte* application to a court to proscribe the person or entity. Section 48 does not give proscribed entities the chance to defend themselves in front of a judge, contrary to the principles of fair hearing firmly enshrined in the Constitution. Not only that, Section 48 does not offer the entity any compensation upon the revocation of the proscription order or any other sanctions against the government for improper proscription. The entity is left to reclaim its battered goodwill and identity by own self efforts.

Sections 5 (3) (d) and (e), 77, 78, 79, 80, and 81 of the TPA authorize law enforcement and security agencies to freeze or seize funds or property involved in or connected with an act of terrorism upon "reasonable belief" or "reasonable suspicion." Because what constitutes a "reasonable belief" or "reasonable suspicion" is vague and at the discretion of law enforcement authorities, these provisions could become recipes for economic rights violations, and easily activated against critics, dissenters and opposition groups.

Regarding the procedure for revocation of certificates for non-profit organizations (NPOs) stipulated in Section 56 of the TPA, the Registrar General of the Corporate Affairs Commission (CAC) or the Director of the Special Control Unit Against Money Laundering (SCUML) may refuse or revoke the registration of non-profit organizations (NPOs) linked to terrorist organizations based on criminal intelligence reports or on the basis of national security. The Office of the High Commissioner for Human Rights (OHCHR) has stated that the legality of an organization's purposes and its compliance with the law should be reviewed **only when a complaint is lodged against it, and that only an independent judicial body should be given the**

**authority to review its purpose and determine whether it is in violation of existing law.**<sup>17</sup> To exercise Section 56 powers without prejudice, authorities must have sufficient evidence and proof of a link to terrorist groups and not rely on mere reasonable suspicion or belief.

## 3. Prolonged Detention Beyond Constitutionally-allowable Limits

Section 66(1) of the TPA 2022 is perceived as a bare-faced affront to human rights. The section provides:

**Notwithstanding provisions in any other law, the Court may, pursuant to an ex-parte application, grant an order for the detention of a suspect under this Act for a period not more than 60 days, subject to renewal for a similar period, until the conclusion of the investigation and prosecution of the matter that led to the arrest and detention is dispensed with provided that in the case of renewal, the relevant agency shall involve the Attorney-General**

The above provision contrasts the express prohibition against prolonged detentions in the Nigerian Constitution. Section 35 of the Constitution discourages the detention of any suspect longer than 48 hours without a court order.<sup>18</sup> It falls short when passed through the constitutional test, and accordingly void to the extent of the inconsistency. Provisions that allow for prolonged detention without trial create opportunities for human rights abuses.

## 4. Enhanced Exposure to Online Surveillance

Vague provisions can be exploited to abuse human rights. Section 13(2) of the TPA makes it illegal to support terrorist organizations by disseminating their propaganda online, through other electronic or digital channels, or by using printed materials. Absent adequate controls, this provision poses a

17. Office of the United Nations High Commissioner for Human Rights (OHCHR), [Human Rights, Terrorism and Counter-terrorism](#)

18. See Section 35.





threat to free expressions made online, particularly ethnic sentiments made in support of agitators or proscribed groups. For instance, the Department of Security Service (DSS) reportedly detained a businessman in 2021 for making comments in favor of the Independent People of Biafra (IPOB) on social media.<sup>19</sup> Similarly, the DSS charged a woman in the Federal High Court for making pro-IPOB comments on Facebook.<sup>20</sup>



For social media users and civic actors, this provision further raises the risk of exposure to online surveillance. Section 13(2) implicitly grants security agencies the right to indiscriminately surveil citizens and keep tabs on their online activities, including their commentary on social media. This is a violation of the citizen's fundamental right to personal privacy, protected under Section 37 of the Constitution. The Action Group on Free Civic Space (AGFCS) reported how the government and its agencies are allocating sizable budgets and buying intrusive technologies to surveil citizens in the name of preventing insecurity and terrorism.<sup>21</sup>

### 5. Interception of Communications Can Cause Privacy Breaches

Section 68 of the TPA allows security agencies to apply ex-parte to the Court for an "interception of communication order" for the prevention of a terrorist act, the detention of a terrorist act, or the proscription of offenders under the act, with the

approval of the National Security Adviser. The court can issue an order compelling communication service providers to intercept and retain a specific communication or communications of a specific description received or transmitted or about to be received or transmitted by that communication service provider, including call record data or metadata. Article 17 of the International Covenant on Civil and Political Rights (ICCPR) forbids States parties from invading the privacy of those under their jurisdiction and obliges them to provide legal protection for those individuals against arbitrary or illegal interference with their privacy. Acts of state actors that affects a person's privacy must be lawful, that is, it must be permitted by law.<sup>22</sup> This does not imply that states have unrestricted authority to interfere with privacy, because any limitation on rights must be necessary to achieve legitimate goals and be proportionate to those goals. The government must pledge to prevent the wrongful use of this provision to infringe on privacy guarantees.

### 6. Criminalization of Ransom Payments

Outlawing the payment of ransom to abductors, kidnappers, and terrorists for the release of any person who has been kidnapped is counter-productive and difficult to implement. This is because such payments and the preceding negotiations are usually shrouded in secrecy. Where law enforcement authorities have failed in their obligation to secure lives and properties, they lose the moral ground to frustrate attempts made by private citizens to ensure the release of their loved ones.

### 7. Limited Legal Protection for Women and Girls

Starting with the abduction of Chibok girls in 2014, too many girls of school age have been kidnapped by terrorists in large numbers for ransom, with many of them eventually being married off to the terrorists. Kidnapping schoolgirls for ransom is, surprisingly, not on the long list of acts classified as terrorist acts in Nigeria. Without stiff penalties and other deterrence measures for these acts, the physical safety of young schoolgirls and their educational freedoms will remain threatened. The Act should be amended to criminalize abduction and forced marriage of abducted girls<sup>23</sup> and give legal backing to sanctions against such practices.

19. Tribune 2021, [Businessman arrested by DSS over alleged IPOB comments on social media, lawyer alleges, accessed on Jul 13, 2023](#)

20. FG Arraigns Lady for Promoting IPOBs Activities on Facebook

21. AGFCS 2021, [Security Playbook of Digital Authoritarianism in Nigeria](#)

22. OCHR Ibid

23. See the case of Aoko v. Fagbemi 1961 1 ANLR, 400.



## CONCLUSION

Overall, TPA2022 broadly operationalizes the Federal Government's a whole-of-government and whole-of-society approach for combating terrorism, terrorism financing and related offence, highlighting the roles of national, municipal, and community-based actors, public and private sector, law enforcement and non-law enforcement. Beyond legal reform, additional emphasis should be placed on addressing the conditions that make terrorism thrive. The government should take concerted steps toward addressing issues of social inequality, illiteracy and endemic poverty and other conditions that fuel acts of terrorism.

Considering the strengths and gaps in the TPA law examined above, mainstreaming important human rights safeguards into national counterterrorism measures are imperative to ensure that law enforcement institutions are strengthened, intelligence gathering improved, human rights violations redressed and suspected terrorists brought to justice within a transparent and accountable system.

## REFERENCES

- Action Group on Free Civic Space, [NIGERIA: SHRINKING CIVIC SPACE IN THE NAME OF SECURITY](#)
- AGFCS 2021, [Security Playbook of Digital Authoritarianism in Nigeria](#)
- CLOSING SPACES DATABASE: [www.closingspaces.org](http://www.closingspaces.org)
- 'FG Arraigns Lady for Promoting IPOBs Activities on Facebook
- National Financial Intelligence Unit (NFIU) [National Inherent Risk Assessment of Terrorist Financing in Nigeria](#)
- Office of the United Nations High Commissioner for Human Rights (OHCHR), [Human Rights, Terrorism and Counter-terrorism](#)
- Spaces for Change, [POLICY BRIEF: MONEY LAUNDERING \(PREVENTION AND PROHIBITION\) ACT, 2022 & NON-PROFITS IN NIGERIA, May 2022](#)
- Spaces for Change: 'S4Cs Remarks At UNOCT Malaga Conference: UN High-Level International Conference On Human Rights, Civil Society & Counter-Terrorism
- Spaces for Change, 2021, [#EndSARS: Police Brutality, Protest and Shrinking Civic Space in Nigeria: Closing Spaces Database, 2020, 'Court Grants CBNs Request To Freeze Accounts Of 19 #EndSARS Protesters, Accessed on Jul 11, 2023](#)
- The Nation: Ransom payment: Jail or death?
- The United Nations Global Counter-Terrorism Strategy, Resolution adopted by the General Assembly on 22 June 2023
- Tribune 2021, [Businessman arrested by DSS over alleged IPOB comments on social media, lawyer alleges, accessed on Jul 13, 2023](#)
- United Nations Office of Drugs and Crimes (UNODC) [Victims of Terrorism](#)
- Victoria Ibezim-Ohaeri, ['COVID-19: The Legality And Limits Of The Presidents Emergency Powers](#)





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