

RE-VISITING POLICE ACCOUNTABILITY IN NIGERIA: BRIDGING THE GAP BETWEEN LAW AND PRACTICE*

Abstract

This paper critically examined the persistence of police brutality in Nigeria in spite of judicial and statutory measures in place. It focused on the impact and consequences of police accountability, with particular reference to the violation of human rights, torture, and extrajudicial killings, and also the implications of extracting confessional statement of a defendant, under duress, as against the required standard. This paper equally examined the legal architecture, institutional challenges, and socio-political factors that hamper compliance with the role of oversight duties of the police services commission, which is also required for capacity building and reforms. This paper adopted a doctrinal approach. The study found that activities of the Nigerian Police associated with Police brutalities are unlawful detention, extortion, excessive use of force, noncompliance with Force Order 237, Corruption, investigation, and extrajudicial killings. This work recommended that police authorities should always organize workshops, particularly for the Junior Officers, with other sister agencies in conjunction with the National Human Rights Commission and other International Bodies, such as the UNODC, FEDA, Red Cross Societies, Ministry of Justice and NAPTIP, and during which the officers shall be trained on global related issues of fundamental human rights, of citizens in Nigeria. Bridging the gap between law and practice will restore public confidence in the police.

Keywords: Police Accountability, Bridging the Gap, Law and Practice, Nigeria

1. Introduction

Police accountability is an essential component of any democratic nation, being the foundation upon which public trust, safety, policies, fundamental human rights, liberties, governance, and the rule of law and built. In Nigeria, the public concern about police accountability has remained contentious and complex. And despite several policy reforms resulting from constitutional provisions, statutory reviews, all aimed at reforming police conduct. Indeed, the practical reality has continued to place the Nigeria Police Officers on a deep-rooted gaps between our law as it were in the document and the law as it is obvious that Nigeria Police Force, for some time has been associated with serious cases and allegations of human Rights abuses, ranging from Extra- judicial killing, unlawful detention, corruption, torture, rape of female detainees in Police custody. Excessive use of Force, poor investigation, Exhortation, intimidation, application of duress while extraction, confessional statement of defendants without their legal representation or family members as required by Law, and this could be seen from the widespread public outcry concern, which resulted in the 'End SARS Protest of 2020,' against the Nigeria Police brutality by SARS personnel. Ironically, those that are supposed to protect the citizens in turn violate citizens' Fundamental Human Rights, with all manner of impunity, against their functions as spelt out expressly both in the Constitution, the Police Act 2020, and under ACJA, 2015. For instance, sections 4, 5, and 6 of the Nigeria Police Act, 2020, which spell out duties of the Police under Part II of the said Act, shall be taken into consideration.

2. Legal Frameworks of Police Accountability: Section 4 of the Nigeria Police Act, 2020, provides for the Primary Function of the Police Force, such as: (a) Prevent and detect crimes and protect the right and freedom of every person in Nigeria as provided in the Constitution, the African Charter on Human and Peoples Rights, and any other Law, ¹ (b) maintain public safety, law and order. ² In *IGP & Ors v Kennedy Umoh & Anor*³, the Court of Appeal held that the power of the Police under the Police Act and the Constitution to arrest, detain, and prosecute where necessary, the Inspector General of Police, can properly be sued for actions of Officers under his command when those actions are within statutory duty. And that the Court must be cautious and reluctant not to interfere unjustifiably and unnecessarily' with lawful police functions, unless there is a clear infringement of fundamental rights. In *Amos & Ors v Daniel & Ors*,⁴ it was held that the objectives and general duties of the Police under Section 4 of the Police Act, for prevention, detection of crime, protection of Rights, etc, are valid and enforceable under the Law, while in *IGP & Anor v. Ubah & 3 Ors*⁵ It was held by the Court that the Police powers to prevent, detect crime, preserve Law and Order, protect life and property, cannot be curtailed by injustices or Court Orders, as it will be a clear violation of Constitutional rights. That Police investigation is discretionary and

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¹ Section 4(a) of the Nigeria Police Act, 2020

² Section 4(b) of the Nigeria Police Act, 2020

³ (2022) LPELR – 57715 (CA)

⁴ (2023) LPELR – 60454 (CA)

⁵ (2014) 11 CLRN 78 (CA); LPELR – 23968 (CA)

the Courts lack the power to rein in lawful investigation, because of potential prejudice. In *Kure v COP*,⁶ the Supreme Court held that the Police have no business intervening in purely civil disputes, such as Civil contract disputes, even if one party treats it as a crime, and that the police are not agents of debt collectors or arbitrators. That is when a matter is purely a civil transaction and not a criminal offence; reporting such to the police and initiating criminal proceedings is improper. This position was also affirmed by the Appeal Court in *Nisadiugwu v. IGP & Ors*⁷ it was affirmed that the police are neither debt collectors nor arbitrators, and should avoid involvement in civil disputes.

- (a) Protect the lives and property of all persons in Nigeria;
- (b) Enforce all Laws and Regulations without any prejudice to the enabling Acts of other security agencies;
- (c) Discharge such duties within and without Nigeria as may be required of it under this Act or any other Law;
- (d) Act Collaborate with other agencies to take any necessary action and provide the required assistance or support to persons in distress, including victims of road accidents, fire disasters, earthquakes, and floods.
- (e) Facilitate the free passage and movement on highways. Roads and streets open to the public; and
- (f) Adopt community partnership in the discharge of its responsibilities under this Act or under any other Law; and
- (g) Vet and approve the registration of private detective schools and private investigative outfits.

Section 5 of the Police Act 2020 deals with the duty of the Police to enforce certain constitutional provisions, provided as follows;

Section 5(1) 'The Police Force is responsible for promoting and protecting the Fundamental Rights of persons in Police custody as guaranteed by the Constitution'⁸

Section 5 (2) For subsection (i), the Police Force shall collaborate with and maintain close working relationship with any government agency or relevant private initiatives in the establishment of schemes or mechanisms offering legal services to accused persons, detainees or accused person in Police custody in need of legal services to ensure that they have full access to justice as laid down under the relevant provisions of Chapter IV of the Constitution'⁹

While Section 5(3) of the Police Act 2020 also provides that 'In addition to the provisions of subsections (1) and (2), the Police Force is also charged with the responsibility for promoting the fundamental right of all persons guaranteed under the African Charter on Human and Peoples Rights (Ratification and Enforcement) Act and International Legal Instrument on Human Rights...'¹⁰

3. Legal Framework for Police Accountability under the 1999 Constitution (As Amended)

Section 214(1) of the 1999 Constitution (as amended) established the Nigeria Police Force, which provides that; 'There shall be a police force for Nigeria, known as the Nigeria Police Force (NPF). No other Police Force shall be established for the Federation or any part of it.'¹¹ And in considering the legal implication of Section 214 (1) of the 1999, Constitution in Police accountability and bridging the gap between Law and Practice, it is crystal clear that this provisions has created more challenges in addressing security situation in Nigeria, particularly between the Federal Government and the State, in terms of state control of Federal Police the State Governors consequently upon this that;

- i. The Nigeria Police Force, by Section 214 (1) of the 1999 Constitution, is a single Federal Police structure.
- ii. With a centralized policing system
- iii. That the state Government cannot create its own separate police force, except as permitted by the Constitution provided under Section 214 (2) of the 1999 Constitution.
- iv. Prohibition of any parallel or compelling state police force without constitutional amendment
- v. That only the National Assembly can legislate on the legal framework of the Nigeria Police, particularly in the area of amendment of the Police Act, organizational structure of the police, the powers and duties of the police, and both recruitment, promotion, and discipline mechanisms of the Nigeria Police Force.

Though there are various state security outfits in the country, such as the 'HISBA' operating in the Northern state, such as Kano, the Amotekun, from the southwest, Ebube Agu, from the South East, however, such state outfits are not 'Police'.¹² And some scholars have argued about a single Federal Police, in a country of about 230 million

⁶ (2020) 9 NWLR (Pt – 1729) at 296

⁷(2015) LPELR – 26027 (CA)

⁸ Section 5(1) of the Police Act 2020

⁹ Section 5(2) of the Police Act, 2020

¹⁰ Section 5(3) of the Police Act, 2020

¹¹ Section 214 (1) of 1999 Constitution

¹² See also Sections 35, 36, and Section 46 of the 1999 Constitution.

people with multi-Ethnic differences and language barriers, thereby advocating that a centralized Police structure has contributed to inadequate and slow response and lack of community trust by the citizens. It has also been observed that, the population of Nigeria and the complexity of different language barriers which has equally negated effective policing, has called for state or local police force, that will have a constitutional backing, as these local police will meet the needs of the citizens both at the local level, under the control of the state governors, who are also chief state security officers. And the following cases uphold the centralized nature of the police force in Nigeria. For instance, in *A.G. Ondo State v A.G.F.*¹³ the Supreme Court held that ‘Although the case concerned the corrupt practices and other related offences Act (ICPC), the Supreme Court made pronouncements on the exclusive Federal powers, including policing and security. And the Supreme Court affirmed that only the Federal Government can establish a police force under Section 214 of the 1999 Constitution (as amended). In *A.G. Lagos State v. A.G. F*¹⁴, it was held that, though the dispute involved control and regulation of inland waterways, the Supreme Court reinforced the doctrine that where the Constitution assigns a power to the Federal Government exclusively, the state cannot derogate from it. And that policing and security structure falls within Federal jurisdiction, and the states cannot create an equivalent force within their Police powers. In *Fawehinmi v. IGP*¹⁵ The Supreme Court held that the power of the police to investigate offences is a creature of the Constitution, citing Section 214 and Section 215 of the 1999 Constitution.

4. Police Powers on Video Recording of a Defendant under Administration of Criminal Justice Act (ACJA)

Section 16 of ACJA, 2015, provides that the arrest of a defendant shall be lawful and Humane, and that the police must ensure that a person arrested is not subjected to torture, inhuman, or degrading treatment. And that interrogation methods must comply with human rights standards, and arresting officers must inform the defendant of the reason for the arrest.¹⁶ Section 17 (1) of ACJA, 2015 provides that when a defendant wishes to make a confessional statement, the police shall;

- i. Record the making of the statement electronically (video recording), or
- ii. Where video recording is not available, the statement must be made;
 - a. In writing
 - b. In the presence of a legal practitioner, or
 - c. In the presence of a justice of the peace, a magistrate, or other accredited person.¹⁷

Section 17 (2) ACJA, 2015, provides that failure to record electronically does not automatically render the statement inadmissible, but that prosecution must explanatory video recording was not used.¹⁸ And the reason for this provision was to prevent the following prosecutor challenges in the criminal justice system and to discourage the idea of defendant statement been obtained under duress, which often result to ‘Trail within Trail’ to prevent torture, intimidation, threat, and coercion, and also to ensure a transparent system of taking confessional statement of statement of defendant, with consistent human rights standard. In *FRN v Nnajofofor*,¹⁹ the Supreme Court held that the provisions of ACJA, 2015, particularly Section 15(4) and Section 17(2) of ACJA, 2015, imposed a strict procedural requirement for confessional statements. The Supreme Court interpreted the statutory word ‘MAY’ to mean ‘MUST,’ given the purpose of the Law to protect suspects from coercion and involuntary confession. Any confessional statement obtained without compliance with those recording (or presence of Lawyer or witness), such statement is treated as inadmissible, and the failure is ‘flagrant noncompliance with Section 17 of ACJA, 2015.’²⁰ In *F.R.N. v Akaeze*,²¹ the Supreme Court held that the mandatory nature of video or audiovisual recording under Section 17 (1) (2) of ACJA, 2015, is mandatory.

Legal implications of Supreme Court Ruling on Section 7 (1) (2) ACJA 2015

- i. That law enforcement agencies cannot treat video or audio recording of a defendant confession as optional or discretionary.
- ii. That confessional statements obtained from a defendant without compliance with Section 17 of ACJA, 2015 must be excluded from evidence, shielding defendants from being coerced, forced or involuntary confession.

¹³ (2002) 9 NWLR (Pt. 972) 222

¹⁴ (2004) 18 NWLR (Pt. 904)

¹⁵ (2002) 7 NWLR (Pt. 767) 606

¹⁶ Section 16 of ACJA, 2015

¹⁷ Section 17(1) ACJA, 2015

¹⁸ Ibid

¹⁹ (2024) 10 NWLR (Pt. 1947) at 443

²⁰ Ibid

²¹ (2025) 12 NWLR Pt. 1951) 1

- iii. The ruling strengthens procedural fairness, due process and human rights safeguard in criminal justice system, particularly as it relates to criminal investigations, and trials under ACJA, 2015. In *Friday Charles v The State of Lagos*,²² the supreme Court recognizes that the procedural safeguard(s) for confessional statements (video or presence of lawyer) serve to protect suspects' constitutional Rights, against involuntary confessions.

5. Police Powers and the Anti-torture Act (ATA) 2017

The Anti-torture Act (ATA) 2017, in Nigeria, was a first standalone legislation criminalizing torture. It aligns Nigeria with the United Nation convention against torture. Section 2 of the (ATA), 2017, prohibit torture, of any kind and declares; (a) Torture as a criminal offence in all circumstances, (b) That no exceptional situation (war, national emergency, instability, etc) can justify torture, and (c) That torture is none – derogable; the right cannot be suspended.²³ Section 3 defines torture broadly to include physical harm, mental and psychological harm. Methods like beating, mock executions food deprivation, threats, prolonged detention, torture resulting to extra judicial killing etc.²⁴ Section 4 deals with those who can be guilty under the torture Act, such as the police officers, military personnel, other law enforcement officers or public officers, and anyone acting, 'at the instigation, consent or acquiescence' of officials²⁵ while section 8 of ATA provides that; any confession obtained through torture is; (a) inadmissible in Court (b) null and void, even if the²⁶ defendant 'confirms' it in writing and under section 10, victims are entitled to compensation, restitution, rehabilitation, apology, recovery of property where necessary.²⁷ In *Odogu v AGF*,²⁸ the Supreme Court condemned the unlawful detention, inhumane treatment, and military style investigative tactics. The Court held that the police must operate within the limits of the constitution, not as if Nigeria is under military rule. In *Ibrahim v C.O.P.*²⁹ The Court of Appeal condemned the police for i. Torture II. Coercion and iii. Obtaining confessions through duress and the Court held that, 'The Era of brute force and military methods of extracting statements is gone. Nigeria now operates a constitutional democracy that respects human dignity.'³⁰ In *Peter Nemi v A.G. Lagos State*,³¹ the Supreme Court held that fundamental rights under CAP IV of the 1999 Constitution must be observed strictly, and that police brutality is incompatible with constitutional Order. In *Uzoukwu v. Ezeonu II*³², the Court stressed the dignity of the human person, under Section 34 of the Constitution, thereby condemning 'military-era methods' of suppressing citizens. Also, in *Emeka v State*,³³ Police officers tortured 'defendant to extract a confession, the Court held that 'A confession obtained by torture is a relic of the military era, and cannot stand under a constitutional democracy.'³⁴

6. Recommendations on how the Police can bridge the Gap between Law and Practice

The 'Gap' connotes differences between what the law commands and what the police actually do in Nigeria; it is presumed that there are strong laws, but weak enforcement. Thus, to bridge this gap, the police must reform their institutional operation and cultural levels, and this can be done through the advocated following measures, such as:

- i) Strict compliance with ACJA, 2015, and (ATA) 2017, and this will promote accountability and community confidence. This can be done through mandatory video recording of confessions, access to legal counsel by the defendants, avoiding civil arrest in civil matters, and avoiding prolonged detention beyond constitutional requirements without the order of the Court.³⁵
- ii) Strengthen the police internal mechanism of effective performance of duties and accountability: This can be done through the mandatory supervision by the IGP mentoring monitory unit, IGP X-squared functional and with community relation units NGO's, religious leaders, with a transparent sanction reports, through independent review of complaints disciplinary action against abusive or errant officers, and partnering with the National

²² (2023) 13 NWLR (Pt.1901) (213) SC

²³ Section 2 of (ATA) 2017

²⁴ Section 3 of (ATA) 2017.

²⁵ Section 4 (ATA) 2017

²⁶ Section 8 (ATA) 2017

²⁷ Section 10 (ATA) 2017

²⁸ (1996) 6 NWLR (Pt. 456) 508 (SC)

²⁹ (2018) 14 NWLR (Pt. 1639) 342 (CA)

³⁰ Ibid; See also the case of *Nnaji for v FRN* Ibid

³¹ (1996) 6 NWLR (Pt. 452) 42 (SC)

³² (1991) 6 NWLR (Pt. 200) 708 (CA)

³³ (2014) LPELR -22655 (CA)

³⁴ Ibid

³⁵ See the case of *Ibrahim v COP* (supra)

Human Rights Commission and Police Service Commission on Joint Investigation where a police officer is alleged to have acted unprofessional.³⁶

iii) The issue of poor digitalization of policing and intelligence gathering procedures during investigations: The use of body cameras, installation of CCTV in the police interrogation rooms, electronic registers for such arrests, such as the criminal central register, provided under Section 6 of ACJA, 2015, digital case diaries, and police administrative to be free and liberal, as provided under Section 158 and Section 160 of ACJA, 2015, taking account the provision of Section 36(5) of the 1999 Constitution,³⁷ of the presumption of innocence.³⁸ Where Courts demand objective proof of the voluntariness of a defendant's confessional statement sought to be tendered in Court.

iv) Training and Re-Training of Police Officers: In order for the police to remain accountable and be competitive with the Global standard, the Police must constantly undergo the following leadership training: human rights training, investigation techniques, non-coercive interrogation, use of force protocols, and community policing.³⁹

v) Public trust building, through community engagement: On this, police must be trained on how to collaborate with communities and other sister agencies, con synergy with the local vigilantes, hold town hall meetings, act transparently, and establish early response units. The Court held that policing must be people-centered.

vi) Obedience to court orders: The Nigeria police often ignore Court Orders, thus bridging the gap means respecting the judiciary.⁴⁰ held that the Court orders must be implemented.

vii) Ending militarized policing and torture: Police must align themselves with democracy and not military-era methods.⁴¹

viii) Improving in fragmental tools and welfare of police officers: Better welfare reduces corruption, extortion, and brutality; thus, there is already advocacy by the public for police welfare, such as adequate salaries, housing, equipment, modern vehicles, and forensic laboratories.

ix) Collaboration between the police and external oversight: This will require the police to work with other institutional agencies such as the National Human Rights Commission, the Legal Aid Council, Non-Governmental organizations such as CLEEN FOUNDATION, the FIDA, etc, the civil society, media, and the judiciary, and it has been observed that oversight reduces corruption, impunity, and brutality.⁴² where it was held that the rule of law must guide state institutions. In *Bamaiyi v State*,⁴³ the Court held that police cannot act arbitrarily in a democratic society.

7. Existing Gap

There is no court in Nigeria that has explicitly adopted or institutionalized community policing, or people centered policing as a binding doctrine. Also, there is not much jurisprudence enforcing or interpreting these statutes to build a community – oriented policing mechanism.

8. How Police Accountability in Nigeria Contrast the Gap Between Law, And Actual Policing and Enforcement Culture

However, practical policing in Nigeria, remain heavily discretionary and often authoritarian in nature. And according to David Bayley's on democratic policing theory, he observed that 'Police legitimacy rests on accountability to law, transparency, and service to the community, and not the state'⁴⁴ this theory did not take into consideration, the provision of Section 214, of the 1999 Constitution (as amended) where in, is only the Federal Government that have the exclusive powers to legislate on the Nigeria Police, while Section 215 of the Constitution deals with the formation, regulation, of the police council, headed by the president. According to Alemika, on 'Police accountability and reform in Nigeria; he argued that Nigeria's police structure remains militarized, with a colonial command ethos. And that real accountability requires decentralization and independent

³⁶ See *Odogu v AGF* (1996) 6 NWLR (Pt. 456); and also, the case of *Musa v COP* (2004) 9 NWLR (Pt.) 879) 483

³⁷ *Ejike Okoye v COP* (2015) LER

³⁸ *Owhoruke v COP* (2015) 15 NWLR (Pt. 1483) 557 (SC)

³⁹ See *Peter Nemi v AG, Lagos State* (*supra*) on the issue of the dignity of human persons.

⁴⁰ See the case of *Okungbowa v State* (2017) LCN (6764 (CA); CA/B/324/07

⁴¹ See also the case of *Emeka v State* (*supra*)

⁴² See *INEC v Musa* (2003) All NLR at 322

⁴³ *Bamaiyi v State* (2001) All NLR at 200

⁴⁴ David Bayley (1995), Police for the future

civilian oversight. Again, this theory falls short of the reality of what is on the ground. While Alemika considered decentralization of Nigeria of Nigerian police as a means of accountability, he fails to understand that corruption in the system, poor knowledge amongst the police officers, poor welfare, inadequate training, indiscipline, and absence of job motivation have contributed greatly to non-accountability by the police. According to Odinkalu, police accountability and democratic control in Nigeria, he observed that constitutional guarantees are undermined by the absence of sanctions for rights violations. He recommended that judicial activism and functional oversight agencies to always hold the police accountable. However, while Odinkalu, position was quite apt, the problem of disobedience of Court orders by the police will still hinder police accountability.⁴⁵ According to Samuel Walker; 'The New World of Police Accountability' argued that the rise of civilian oversight, consent decrees, and the use of body cameras in the U.S through the use of body cameras in U.S.A, many have improved the public oversight, in holding America public oversight, in holding America police accountable, however the issue of selection Africa Americas police brutality has result to numerous extra judicial killings of blacks by the America police, and other human rights abused. For instance, the case of George Floyd, 2020, by Derek Chauvin, Minneapolis police is illustrative. On May 25, 2020, police arrested George Floyd for allegedly using a counterfeit & 20 bill. During the arrest, Derek Chauvin knelt on Floyd's neck for over nine minutes despite Floyd's cries 'I can't breathe.'⁴⁶ This incident sparked massive protests in America and worldwide under the 'Black lives matter.'⁴⁷ In the year 2021, Chauvin was convicted of second-degree murder, third-degree murder, and manslaughter. In the case of *Laquan McDonald*, in 2014, on October 20, 2014, Laquan, a 17-year-old Black Youth, was shot 16 times by a Police Officer, Van Dyke. Dash – footage contradicted initial police claims that McDonald posed an imminent threat; it showed McDonald walking away from officers when shoot. This cover-up triggered public outrage, protests and demands for police accountability. The Police office Van Dyke, was tried and convicted on lesser charge of second – degree murder and aggravated – battery, in 2018'⁴⁸

9. Conclusion

This study examines the frameworks governing police accountability in Nigeria and to highlights the persistent gap between law and practice. It is evident from the analysis that Nigeria possesses a comprehensive set of Laws and institutional mechanisms or bodies, designed to guide and monitor police conducts, including the 1999 Constitution (as amended), the Administration of Criminal Justice Act, 2015; the Police Act, 2020, and oversight bodies such as the National Human Right Commission (NHRC), the Police Service Commission (PSC) and various Judicial Review Processes. However, the effectiveness of these laws remains significantly undermined due to a systemic weakness that render accountability more theoretical than being practical. This study revealed that the central problem is not the absence of legal frameworks, but the inability of these frameworks to function effectively within the country's socio-political and institutional environment. Widespread of corruption, impunity poor operational capacity, inadequate training, poor funding and political interference continue to erode the Police Force. While institution like PSC, often lack independence, or political support necessary to sanction erring officers. Public trust in the police remains low, due to recurring incidents of police extra-judicial killing of citizens, the issue of torture, unlawful arrests and detention, etc. That despite repeated reforms, including the Police Act, 2020, and various presidential panels on Police reforms, implementation has remained weak, inconsistent, or largely symbolic. And this has created a disconnect between statutory objectives and real time policing practices in Nigeria. Most importantly is that, an anticipated reform that fails to consider the welfare of the personnel, whether serving or retired, would continue to widen the gap between law and practice. For instance, the 'SOWERE' led a national protest by retired Police Officers, who were agitating for the removal of Police officers' retirement benefits from PENCOM. This study, therefore, concludes that bridging the gap between Law and practice demands more than legislative innovation. It required deep-rooted structural, institutional, and cultural reforms within the policing system. Thus, accountability will only be achieved where oversight institutions are strengthened, transparent, public trust or confidence is rebuilt, and the police from undue political influence. Effective police accountability is essential not only for law enforcement but also for the protection of human rights, consolidation of democratic governance, and promotion of public safety in Nigeria. Accountability must move beyond paper reforms to practical reality. What is required is a coordinated national commitment, political, institutional, and societal, to rebuild the policing system on transparency, professionalism, and trust. Bridging the gap between law and practice is not merely an administrative duty

⁴⁵ *Bamaiyi v State* (supra)

⁴⁶ *State of Minnesota Vs. Derek M. Chauvin*. (2021) Hennepin Country Dist (T. File No. 27 – CR – 20-12646 (Verdict 2021)

⁴⁷ Activist Alicia Garza, Patrisse Cullors and Lepal Tometi (2013)

⁴⁸ Ibid