

COVID-19 PANDEMIC: SECURITY AGENCIES AND EXTRAJUDICIAL KILLINGS AMID ENFORCEMENT OF GOVERNMENT LOCKDOWN ORDER IN NIGERIA

Solomon I. Ifejika^{1,2}

¹ Department of Political Science and International Relations, Landmark University, Nigeria

² Landmark University SDG 16 (Peace, Justice and Strong Institutions) Research Group, Nigeria

ABSTRACT

Corresponding author:
Solomon I. Ifejika
solomonifejika@yahoo.com

Received: 3 March 2021
Revised: 30 July 2021
Accepted: 30 July 2021
Published: 30 November 2022

Citation:
Ifejika, S. I. (2022). COVID-19 pandemic: Security agencies and extrajudicial killings amid enforcement of government lockdown order in Nigeria. *Humanities, Arts and Social Sciences Studies* 22(3): 686-699.

Nigeria's response to the COVID-19 pandemic has produced mixed reactions. While governments at all levels are making commendable efforts in the fight against the dreaded disease, measures put in place to aid the fight, have resulted in extreme human rights abuses. Specifically, the incidents of extrajudicial killings arising from the activities of the personnel of security agencies deployed to enforce the government lockdown directive, has become increasingly alarming. Using the documentary methods of data collections and analysis, the paper therefore analyzes the major cases of unlawful murders of the citizens by officials of Nigeria's security forces throughout the period of the nationwide lockdown instituted by the government to contain the spread of the disease within the country. It finds that the illegal killings of the citizens by the security agencies that are meant to protect undeniably defeats the primary essence of state security. The paper thus contends that the trend holds unprecedented consequences for the Nigerian state and its security institutions in relation to the country's human rights image at national, regional and global levels. In light of this, the study recommends workable measures or actions that should be taken to checkmate the trend now and in future times.

Keywords: Coronavirus; state security; security agencies; human rights; extrajudicial killings

1. INTRODUCTION

The coronavirus disease, code-named COVID-19 pandemic, is the greatest health challenge facing the entire world at the moment. The pandemic broke-out in Wuhan, China in December 2019 and later spread rapidly to many other countries of the world including Nigeria. In an effort to contain the disease, the Presidential Task Force on COVID-19, on behalf of the Nigerian Federal Government on Sunday, March 29, 2020, announced the government's decision to impose a lockdown on major cities in the country with severe effects of the disease. As directed by the government, the lockdown order took effect the following day being Monday, March 30, 2020, in the COVID-19 high risk states of Lagos, Ogun and Abuja, Nigeria's Federal Capital Territory. In his address to the nation during which he declared the lockdown, President Buhari had issued an

order, banning all social and economic activities and movements in Abuja, Lagos and Ogun for fourteen days initially (Kola, 2020), and Nigerians resident in these affected states had been advised to fully comply with the government directives. The Federal Government also banned interstate travel (Omilana, 2020). Expectedly, security forces were deployed to enforce the regulations issued by the government, while the citizens were admonished to cooperate with the security agents as they discharged their duties.

However, by mid-April the number of confirmed cases of the coronavirus in Nigeria had increased exponentially. Precisely, during the period, figures released by the Nigerian Centre for Disease Control (NCDC) showed that Nigeria had 323 confirmed cases of COVID-19 in 20 states of the country and the Federal Capital Territory. On April 28, 2020, Nigeria recorded a total of 1,273 cases in 32 of the federation's 36 states and Abuja, with the death toll put at 40 deaths (Daka et al., 2020). Thus, with the spread of the COVID-19 to almost all the states of the federation, governors of all affected states aligned themselves with the Federal Government's measures for containing the spread of the disease by announcing own lockdown or sit-at-home directives, and like the Federal Government, State Governments unanimously banned inter-states movements for an initial period of two weeks. Ultimately, "on April 22, 2020, the Nigeria Governors' Forum (NGF) agreed to a 14-day ban on interstate movement among all 36 states across Nigeria, effective immediately. The new restrictions apply to all interstate travel with exception to essential services" (Overseas Security Advisory Council, 2020, para. 1). Security agents were mandated to enforce the directives on movement restriction both within and across the states the country.

This study is a qualitative research that analyzes the incidents of extrajudicial killings orchestrated by personnel of Nigerian security agencies while they enforced the government's COVID-19 nationwide lockdown directive. The study employs the documentary data collection and analysis methods, whereby secondary data were sourced from books, journal articles, daily newspapers as well the Internet. The data were analyzed using basic instruments of the documentary method of data analysis, such as content analysis, inferences and logical arguments. To achieve the objective of the study, the paper is structured into seven sections.

Section one is the introduction. Section two is made up of a review of literature on the link between state security and human rights in liberal democracy. Section three consists of the theoretical framework for the study. Section four is the analysis of major documented cases of extrajudicial killings by security agencies during the lockdown. Section five is a highlight of the implications of the phenomenon for the Nigerian state and its security forces in connection with human rights protection. Section six constitutes the recommendations of the study, while section seven comprises the conclusion.

2. LITERATURE REVIEW: STATE SECURITY AND HUMAN RIGHTS IN LIBERAL DEMOCRACY

The relationship between state security and human rights constitutes an important issue of concern within the context of modern liberal democratic governance system. Thus, the subject has received a considerable level of attention by scholars in the field. Reinforcing this is the consideration that human rights ultimately define democratic legitimacy and the essence of state governance in the modern era. As Ramcharan (n.d.: 9) asserts, "...we must pursue 'human rights strategies as governance', namely, that each society must indicate that it is the purpose of government, it is the nature of governance, that it seeks to implement the basic civil, political, economic, social and cultural rights of people". The deducible implication of the foregoing is the fact that the task of ensuring adequate protection of human rights is central to the whole idea of state security, and this is the real essence of governance in all societies.

To rehearse for the sake of emphasis and understanding, human rights as referred to in the context of this study consist of:

The rights contained in the Universal Declaration of Human Rights (UDHR), the International Convention on Civil and Political Rights (ICCPR) and the International Covenant on Economic, Social and Cultural Rights (ICESCR), which together constitute the international bill of rights, establish the fundamental components of human rights. These include the rights to life; liberty; personal security and safety; equality and non-discrimination; a fair trial; family; privacy; participation; work; social security; an adequate standard of living; health; education; culture. They also include freedom from torture and other forms of cruel, inhumane or degrading treatment and freedom of religion; expression; association; and assembly and demonstration (Dersso, 2008: 4).

Thus, with the centrality of the human rights system to the democratic governance process, the legitimacy of a state is further strengthened by its ability to ensure adequate respect for, and protection of individual rights. What's more, the attainment of development at all levels including individual, international, and national development demands that human rights are properly protected in the first instance. This is because respect for human rights is an antidote to conflicts, which itself has the tendency to truncate

development process. Security would be scarcely guaranteed in any society in the absence of robust protection for human rights of persons (Ramcharan, n.d.).

The above position aptly establishes the fact that sustainable state security is invariably tied to sustainable recognition and respect for human rights. Indeed, as Lazarus and Goold (2007) have argued, the goals of attaining security and protecting human rights are not essentially opposed to each other. Dersso (2008: 3) also unequivocally observes that, “the aspects and contents of the ‘vital core’ of human lives around which members of the international community have achieved a high degree of consensus are ... given expression through human rights”. It is these human rights that determine in specific terms the core elements of security, that is, what security really seeks to protect (Dersso, 2008). Therefore, in every discourse on this topical issue, it is of high essence to situate the idea of respect for human rights at the centre of efforts towards achieving security (Ramcharan, n.d.). Conventionally, the concept of national security places responsibility primarily on the state, and this is based on the impression that the achievement of state security assures the security of the citizens (Appiagyei-Atua et al., 2017), and this cannot but have the protection of fundamental rights of persons as its core concern. Meanwhile, the legitimate measures adopted by stakeholders in protecting individual freedom and advancing peoples’ wellbeing are defined by human rights (Dersso, 2008).

Lazarus and Goold (2007) observe that both national and individual security affects sovereignty, and that the ability to demonstrably ensure security serves a litmus test of the capability of the modern state system. And drawing from the Lockean and Kantian points of views, liberal democracy is distinguished from totalitarian state in that the former seeks to attain security by means of exercise of democratic sovereignty with the justification of the pursuit of liberty, which itself requires a secured atmosphere to be exercised (Teson, 2005). Thus, “human rights, as positive articulations of the constituents of liberty, are the benchmarks by which liberal democracies are judged. Constitutions, parliaments and courts act to protect them and to constrain the executive’s overweening assertions of authority” (Lazarus and Goold, 2007: 2). In amplifying the indispensability of security in the realization of liberty, and human rights as an integral part of liberty, both of which are inherently embedded in the practice of liberal democracy, the National Commission on Terrorist Attacks upon the United States (2004: 395) affirms in its report in the wake of the September 11, 2001, attacks that:

We must find ways of reconciling security with liberty, since the success of one helps the other. The choice between security and liberty is a false choice...Our history has shown us that insecurity threatens liberty. Yet if our liberties are curtailed, we lose the values that we are struggling to defend.

So, it becomes evident that the actualization of security and protection of human rights are twin noble goals for democratic states. The connection between guaranteeing security and the upholding of human rights enjoys a high premium in the liberal democratic setting, and both concepts complement each other.

Ultimately, human rights proffer important norms, processes and institutions needed to address insecurities. Their emphasis on equality and non-discrimination, the standards they set, and their requirement for institutions and processes that enable individual liberties and freedoms, including political participation, make human rights an important framework for systematically addressing human security threats such as conflict (Dersso, 2008: 6).

There are existing legal instruments within the context of the wider international human rights law to enable governments to maintain a balance on the issues of national security and human rights (Appiagyei-Atua et al., 2017). In corroboration to this view, Ramcharan (2004: 40) provides undisputable credence as follows:

Security is a condition or feeling of safety, of being protected. International human rights norms define the meaning of...security. The Universal Declaration of Human Rights and the wider body of human rights instruments are all meant to make human beings secure in freedom, indignity, with equality, through the protection of their basic human rights. Article 28 of the Universal Declaration of Human Rights is of crucial importance from this point of view. It provides that everyone is entitled to a social and international order in which the rights recognized in the Declaration can be realized.

Further, both the conflict prevention mechanisms of the United Nations Security Council and the Organization of African Unity (now African Union) recognize human rights as a key factor defining security and democratic legitimacy (Ramcharan, n.d.: 9). The UN Charter makes reference to national security in its article 2(4), and refers to human security in its article 1(3) (Appiagyei-Atua et al., 2017). The conception of human security within the United Nations system ushers-in a dynamic and critical perspective on the security, human rights, democracy and development variables that put the individual in the centre as against the state, whereby the security of the state is considered basically to be contingent first on the security of the individual. The African Charter on Human and Peoples’ Rights does not also contain any derogation clause as it affirms

full respect and protection of all constituents of human rights even in emergency situations (Appiagyei-Atua et al., 2017).

It is not to be contested that the protection of human rights by the state as provider of security is even believed to be a moral responsibility. As Ignatieff (2004) posits, the confidence that our rights and guarantees are never to be withheld is a part of moral uprightness. Lazarus and Goold (2007: 3-4) similarly hold that "...constitutional and international human rights once claimed a privileged moral status, their limitation always requiring justification; but claims to security now appear to receive less scrutiny than the assertion of rights that may restrict measures in its pursuit". This stand-point directly implies that human rights have obviously assumed more relevance than security. Nevertheless:

The state...should be considered the central security provider: its stability and legitimacy are the main sources of protection for its citizens, from any kind of threats. The strengthening of national authorities should be a central strategy to ensure the protection of the people. In order to make a state strong enough to guarantee security to its citizens, its legitimacy through democratic, but flexible, means is an important precondition (Trobiani, 2013: 1).

The expectation thus is that, in peace and conflict or emergency times, the issues of security, human rights and human security, democratic legitimacy, among others must be recognized and considered substantially important (Ramcharan, n.d.).

Human rights consist of those rights that are so essential to the well-being of individuals (Dersso, 2008). An unambiguous assertion by Mary Robinson (2002 as cited in Dersso, 2008: 6) states as follows:

The only long-term guarantor of security is through ensuring respect for human rights and humanitarian law. The essence of human rights is that human life and dignity must not be compromised and that certain acts, whether carried out by State or non-State actors, are never justified no matter what the ends. At the same time human rights and humanitarian law are tailored to address situations faced by States, such as a public emergency, challenges to national security, and periods of violent conflict. This body of law defines the boundaries of permissible measures, even military conduct.

In light of the foregoing views, Ramcharan (n.d.) advocates that, in fragile states, or countries that are on the brink of conflict, security agencies need to maintain high standards of discipline and conducts. The notion of human rights therefore remains the main standard for appraising any liberal democracy (Lazarus and Goold, 2007), regardless of circumstances. In the submission of Dersso (2008), the enterprise of human rights promotion and protection remains the most enduring foundation for enhancing freedom and peace and ultimately human security.

3. THEORETICAL FRAMEWORK

This paper adopts the utilitarian theory as a basic analytical framework. The utilitarian theory, otherwise called utilitarianism, is one of the most famous and widely applicable theories in ethical philosophy. Julia (2014) affirms that: "Utilitarianism is one of the most powerful and persuasive approaches to normative ethics in the history of philosophy". Utilitarianism is both moral philosophy and decision-making or action theory (Ridge, 2002). The chief proponents of the theory are Jeremy Bentham and John Stuart Mills. The theory is reputed for its main argument that the rightness or wrongness of any chosen course of action or policy is determined by the outcome or consequences emanating thereby. In other words, "its core idea is that whether actions are morally right or wrong depends on their effects" (Nathanson, n.d., para. 1). Naturally, every action is either accompanied by recognizable good or bad implications or effects (Nathanson, n.d.). Likewise, within the utilitarian tradition, "Bentham and Mills both believed that human actions are motivated entirely by pleasure and pain; and Mill saw that motivation as a basis for the argument that, since happiness is the sole end of human action, the promotion of happiness is the test by which to judge all human conduct" (West, n.d.: 6).

Thus, for the theory, for an action to be considered as right, such action must promote happiness, not just for the agent that performs it, but for all concerned parties, and that a wrong action is the one whose outcome produces the opposite of happiness, that is, pain (West, n.d.). So, as against personal interests, the utilitarian theory advances a case for bringing into consideration the interests of all others or relevant parties in the pursuit of particular line of actions and/or policy decisions. The performing agent therefore is impartial and neutral (Julia, 2014). This way, the theory is opposed to the theory of egoism which argues for the pursuit and actualization of personal interest or welfare, even if it warrants doing so at the expense of the interest of welfare of others, and to other ethical theories that do not consider the rightness or wrongness of actions based on their results or outcomes (West, n.d.).

Utilitarianism is of many varieties, but all the perspectives agree to the central claim or argument that, the only right actions are the ones that produce the best or happiness. Also, commonly held among the variants

of the theory is the emphasis on maximizing the good, that is, that one ought to pursue or engender through one's actions the greatest amount or measure of good or happiness for the greatest number (Julia, 2014). In other words, all the perspectives within utilitarianism believe that: "Everyone's happiness counts the same. When one maximizes the good, it is the good impartiality considered. My good counts for no more than anyone else's good. Further, the reason I have to promote the overall good is the same reason anyone else has to so promote the good. It is not peculiar to me" (Julia, 2014: 4). Practically speaking, in making decision in relation to all spheres of life including in the social, economic and political fronts, utilitarianism would aim at making the society better for all (Tardi, n.d.).

Bentham provides a perspective on how the application of the utilitarian doctrine helps in achieving a better society:

For Bentham, the greatest happiness of the greatest number would play a role primarily in the art of legislation, in which the legislation would seek to maximize the happiness of the entire community by creating an identity of interests between each individual and his fellows. By laying down penalties for mischievous acts, the legislator would make it unprofitable for a man to harm his neighbour (West, n.d., para. 15).

So, in general sense:

Utilitarians believe that the purpose of morality is to make life better by increasing the amount of good things (such as pleasure and happiness) in the world and decreasing the amount of bad things (such as pain and unhappiness). They reject moral codes or systems that consist of commands or taboos that are based on customs, traditions, or orders given by leaders of supernatural beings. Instead, utilitarians think that what makes a morality be true or justifiable is its positive contribution to human (and perhaps non-human) beings (Nathanson, n.d., para. 2).

By implication, any leaders' decisions, actions, practices and orders or directives that produce lesser measure of good effects than bad effects, directly reduce happiness and increase unhappiness or pain among the majority, and thus does not contribute to the betterment of the society.

It is generally accepted or agreed among all utilitarians that "happiness, is the only thing that has intrinsic value" (Tardi, n.d., para. 4). It follows, therefore, that anything or act that tampers with one's happiness, regardless of the purpose or intention behind it, invariably leads to a denial of this essential value.

In its political philosophy Utilitarianism bases the authority of government and the sanctity of individual rights upon their utility...What kind of government is best thus becomes a question of what kind of government has the best consequences – an assessment that requires factual premises regarding human nature and behavior. Generally, Utilitarians have supported democracy as a way of making the interest of government to coincide with the general interest; they have argued for the greatest individual liberty compatible with an equal liberty for others on the ground that each individual is generally the best judge of his own welfare; and they have believed in the possibility and the desirability of progressive social change through peaceful political processes (West, n.d., para. 21-22).

As Tardi (n.d., para. 10) submits: "Utilitarianism holds that the most ethical choice is the one that will produce the greatest good for the greatest number. As such, it is the only moral framework that can justify military force of war".

The utilitarian theory attracts to itself certain criticisms. Critics of the theory argue that: (1) human happiness cannot be accurately quantified, and as an ethical theory of consequentialism (the belief that the outcome or consequence of any human action is the basis for judging such action), utilitarianism does not have the ability to presume the future results of present actions; and (2) utilitarianism does not bring into consideration the motive behind actions (Corporate Finance Institute Team: CFI Team, n.d.). Regardless of this, however, the strength or merit of the utilitarian theory which lies in its central proposition that, the promotion of happiness for the greatest number (which can simply be determined from people's feelings and reactions at the instance of the occurrence of any events, good or bad) is the basis for determining the rightness or wrongness of actions obviously outweighs the foregoing weaknesses of the theory and provides a strong justification for its suitability and appropriateness for this study, and hence its adoption.

Viewed from the optics of the position of the utilitarian theory, the unlawful killing of Nigerian citizens by personnel of security formations who are ideally meant to ensure their safety and protection from the heinous COVID-19 disease through enforcement of government stay-at-home order, was wrong as it has produced great measure of pains over happiness, or evil over good among the citizenry. Human life is precious and irreplaceable; snatching life away from any individual (in the absence of war or violent conflict directly involving the person, for example, insurgency or unjustifiable armed rebellion against constituted authorities) is the highest level of vileness and deprivation of rights for such person, and this would automatically produce sadness. Thus, the action of the personnel of the security agencies in this regard, despite their good intention

to curtail the spread of COVID-19 infection among the populace as aimed by the government, was for most Nigerians the height of moral wrongness, in that it inflicted immeasurable physical, psychological and emotional pains rather than joy or happiness on the people as originally intended. Hence, it becomes rights to posit that, by their conducts, the men and officers of the Joint Security Task Force involved in enforcing government's coronavirus restrictions promoted more evil than good in the society, thereby defeating the primary reason for their deployment in the fight against the dangerous disease in Nigeria.

4. COVID-19 LOCKDOWN: DOCUMENTED CASES OF EXTRAJUDICIAL KILLINGS BY SECURITY AGENCIES

Instances of extrajudicial killings involving personnel of Nigerian security forces deployed to enforce the nationwide government's COVID-19 lockdown order, has been alarming. Just between late March and April 13, 2020, when Nigeria had only recorded 12 deaths as a result of coronavirus, acts of unlawful killings by the security agencies had already resulted in 18 separate deaths (BBC News, 2020). Available record shows that "out of the 18 deaths, the Nigeria Correctional Service was responsible for 8 deaths, while the Nigeria Police Force was responsible for 7 deaths. The Nigeria Army on the other hand was responsible for 2 deaths, while the Ebonyi State Task Force on COVID-19 in Afikpo South LGA was responsible for 1 death" (National Human Rights Commission, 2020, para. 10). Table 1 shows the numbers and percentages of deaths responsible for by the respective security agencies, out of the 18 persons killed extrajudicially in the stated period.

Table 1: Security Agencies and Numbers and Percentages of Persons Extrajudicially Killed in Nigeria between Late March and April 13, 2020 during National COVID-19 Lockdown

S/N	Security Agencies	Number of Killings	Percentages (%)
1.	Nigeria Correctional Service	8	44.4
2.	Nigeria Police Force	7	38.8
3.	Nigerian Army	2	11.1
4.	Ebonyi State Task Force on Covid-19 (Afikpo South LGA)	1	5.5
Total		18	99.8

Source: Authors' Compilation

The table above shows that, the Nigeria Correctional Service (44.4%) was responsible for the highest number of extrajudicial killings seen during the period from March 30 to April 13, 2020, followed by Nigeria Police (38.8%). The next was the Nigerian Army (11.1%), while the least was the Ebonyi State Task Force on COVID-19 (5.5%). In the long run, however, the total number of cases of extrajudicial killings by security personnel as seen throughout the entire period of the COVID-19 lockdown eventually surpassed 18, as more incidents were later witnessed in different parts of the country following State and Federal Governments' extension of, and/or declaration of subsequent phases of the lockdown restrictions as cases of confirmed coronavirus infections continued to rise astronomically. Some incidents of unlawful murders carried out during the period by security agencies in different parts of the country are analyzed below.

4.1 Northern Nigeria

Katsina State was the first state in Northern Nigeria to witness an incident of unlawful killing by security agencies during the nationwide lockdown, when the Police shot one person dead on Saturday, March 28, 2020, during a protest resulting from the arrest of a religious leader that allegedly flouted government stay-at-home orders. The Katsina State Government had publicly issued an order suspending large gatherings of people during the lockdown as part of the efforts at curtailing the spread of coronavirus. However, the religious leader, Mallam Hassan conducted jummat prayers on Friday, March 27, 2020, in one of the jummat mosques in Kusada, with his followers being in attendance en-mass. Consequent upon this, the police got him arrested and took him to the Area Command Office in Malumfashi council, area for interrogation. In reaction, Mallam Hassan's followers, especially the youth, staged a protest the next day, being Saturday, to demand the release of their leader. In the course of the protest, the police clashed with the youth while trying to restore normalcy in the area, leading to the death of one person. Retaliating to this, the youth burnt the Divisional Police Station in Kusada Local Government Area of Katsina State including the DPO's residence as well as seven cars and 10 motorcycles (Olaniyan, 2020; Oyelude, 2020).

The police shot dead five persons on Monday, April 6, 2020, at Trikania in Sabogeri Nasarawa in Chikun Local Government Area of Kaduna State in a clash between the youth in the area and a police team enforcing the coronavirus stay-at-home order in the state. The traders had gathered at a temporary market in Trikania as the Monday market was shut down following the government lockdown directive. Members of the Civilian Joint Task Force (CJTF) earlier tried to disperse the traders but could not as the youth in the vicinity stood

against their effort, thereby overpowered the task force. A reinforcement of well-armed policemen was then sent from the Kakuri Police Division, who at their arrival shot at the agitated mob resisting the order of the CJTF with live bullets, leaving five civilians dead in a moment. Many others sustained divers degrees of gunshot injuries following the incident (Sahara Reporters, 2020).

In Nasarawa State, Nigerian soldiers enforcing coronavirus restrictions displayed their brutality for flogging an elderly woman to death during the morning hours of May 11, 2020, on the account that the victim allegedly violated the state's restrictive order. The incident was witnessed in Tammah area of Nasarawa Local Government Area of Nasarawa State. The deceased was a food seller; she had thus come to sell her food in a bid to fend for her family given the severe economic conditions occasioned by government's measures at containing the coronavirus pandemic. Meanwhile, the soldiers were on the other hand patrolling in the area, flogging and forcing traders who were out to sell their goods to return to their various homes. At her encountering the soldiers, the victim refused to run away and stood back, and explained to the soldiers that her family was passing through a lot due to hunger, and that should she not come out to sell, they would die of hunger. Hearing the victim say this to them, the soldiers became furious and began to flog the elderly woman ceaselessly until she died right there (Ukpong, 2020). The CLEEN FOUNDATION asserts that, "the food seller ... was among the people...unlawfully killed by Nigerian security officials since the restriction of movement was introduced nationwide to halt the spread of the novel coronavirus in Nigeria" (Ukpong, 2020, para. 8).

On Tuesday, May 12, 2020, Rinji Peter Bala, a 300-level student of the University of Jos in Plateau State, was murdered by a member of the Special Task Force - Operation Safe Haven (OPSH), a multi-security task force operating in Plateau State. The incident took place during lockdown after the deceased and his friends were mistaken for criminals and arrested and beaten by some residents of Mission Street, Hwolshe, in Jos South Local Government Area, before handing them over to the OPSH officers, who tortured them to their satisfaction for more than an hour without telling them their offence before one of the officers shot Bala dead (Adama, 2020; Ahovi, 2020).

4.2 South-East Nigeria

Four civilians lost their lives in Abia State, to the gory act of extrajudicial killing by the security agencies during enforcement of the lockdown order. One of the cases was the murder of a 26-year-old man, Comrade Chibuisi Chikezie Okameme, a petroleum worker, in Ururuka in Obingwa Local Government Area of Abia State (Ogugbuaja, 2020). Mr Okameme was shot dead on Sunday, April 15, 2020, by a mobile Policeman attached to the Security Task Force enforcing government's COVID-19 lockdown directives in Abia State, while he discharged his legitimate duty as a petrol station worker and in the front line of the struggle against the COVID-19 pandemic (Nwachukwu, 2020). Until his death, Okameme was an employee of Greemac Energy Limited, located along new Umuahia road in the city of Aba (Industrial Global Union Affiliate, 2020). In another incident, a commercial driver, Mr Amobi Igwe, was also shot dead on Wednesday, April 15, 2020, by an officer of the Nigeria Security and Civil Defence Corps (NSCDC), Eke Richard, a member of a security task force team enforcing lockdown restrictions in Umuikaa in Isialangwa South Local Government Area of Abia State. The victim, Amobi Igwe was allegedly killed by the brutal NSCDC officer for refusing to give bribe to his murderer at the latter's demand, while carrying food items including rice and tomatoes, to the city of Aba (Nwakanma and Okafor, 2020).

The killer, Richard Eke, was said to have pointed his gun at Mr Amobi and demanded the deceased to hand over the vehicles' key to him, threatening to kill him if he attempted to pass the forces' roadblock without offering a bribe to him. While the driver, Amobi sought to be told his offence for such a treatment to a citizen performing an essential duty such as conveying food materials for public consumption to the market, the NSCDC officer shot him at a close range, killing him at that spot and fled into a police station by the Umuikaa junction. The incident took place at the tollgate area in Umuikaa, along the Umuahia-Aba expressway. While confirming the incident, the state Commander of the NSCDC, A.C. Nwakanma and Okafor (2020) denied that the driver was not killed by the officer because he refused to pay bribe. According to him, the driver was not conveying food items, and he refused to stop as the officer ordered him to stop, hence he accidentally got killed by a bullet sprayed in the air by the officer in a bid to make him to stop.

On April 17, 2020, a young man, Mr Ifeanyi Arunsi was also killed by drunken police officers under the leadership of an Assistant Superintendent of Police in Ebem Ohafia area of Abia State. Ifeanyi Arunsi, the victim, was off-loading goods from a truck with his fellow when the police officers, who were not on official duty neither were they enforcing COVID-19 restrictions, drove their car into the truck from which they were off-loading the goods. As a result, arguments sprang up between Ifeanyi and his colleague and the drunk police officers, and being under the influence of alcohol, one of the officers pulled out his gun and shot indiscriminately, leading to the instantaneous death of Mr Ifeanyi (Social Action, 2020). The brutal murder of innocent Ifeanyi resulted in a serious riot in which angry youth set some police vehicles on fire and caused other damages including burning of DPO quarters, destruction of court building within the vicinity and freeing

of suspects in the police cell (Nwakanma and Okafor, 2020; Social Action, 2020). One youth was also gunned down by security personnel, while another person was seriously injured with gun butts and left in a coma state, on the same April 17, 2020, at Urratta Junction in Aba, Abia State (Jimoh, 2020).

In Anambra State, two innocent young men were shot dead by the Police on Tuesday, 14th of April 2020, amid enforcement of the lockdown order in the state. The police officer with COVID-19 Lockdown Task Force killed the victims right outside their residences in the course of trying to enforce the government stay-at-home directive. The gruesome killing of the two young people occurred at the New Tyre Market in Nkpor in Idemili North local Government Area of Anambra State. The police had gone there to force the people in the area to go into their living apartments. In response, they insisted that they were within their compounds on the ground that they were in front of their residences. Thus, tension rose between the Police and residents of the area present there at that moment, leading to the Police gunning down the two unarmed civilians at the spot. Mr Haruna Mohammed, the Police Public Relations Officer in the state, claimed that the killing was due to unjustifiable attack on the police patrol team by some miscreants in the area with substances perceived to be acid (Social Action, 2020). Also, on Wednesday, May 20, 2020, the police in Anambra State, shot dead a young man for allegedly disobeying the COVID-19 curfew order, at Enugu-Ukwu in Njikoka Local Government Area of the state (Ukpong, 2020).

In Ebonyi State, the COVID-19 Task Force team killed one person named Chidi Agwa Arua, 19 years old, and inflicted two other persons with gunshot injuries on March 27, 2020, at Nguzu Eddain Afikpo South Local Government Area of the state, in the course of enforcing the state government's order against mass gathering. The incident resulted from an attempt by the state's COVID-19 Task Force team, to halt a ceremony that was taking place at the residence of one of Ebonyi State House of Assembly's representative member from Afikpo South-West, Mr Nkemka Okoro Onuma as a way of enforcing compliance with the State Government's coronavirus directives. The anti-coronavirus taskforce was said to have been ordered to stop the event by the council Chairman, Eni Iduma Chima. The move by the taskforce was then resisted by some young people in the lawmaker's community, resulting in a clash between them and the enforcers of the government's anti-coronavirus directives. In the process, Chidi Agwa Arua, a native of Nguzu Edda, was shot dead at the spot by the taskforce, while other two persons sustained serious gunshot wounds (Agwu, 2020; Abuh, 2020). Majority of people perceive the action of the COVID-19 Task Force team as being politically motivated (Abuh, 2020).

In Enugu State, the victim of extrajudicial killing by the Nigerian security agencies during the coronavirus lockdown was Augustine Ugwu, 27 years old, who until his brutal death, was a 500-level Law student of Nnamdi Azikiwe University Awka in Anambra State. Augustine was allegedly shot and killed by a Nigerian police officer, Ferdinand Nnamdi Ochi, without any allegations against the deceased, after he was arrested at a beer parlour and beaten by a local security outfit and subsequently handed over to the police. The incident took place at Obodibo in Nsukka, under Nsukka Local Government Area of Enugu State (Odu, 2020).

In Imo State, security personnel arrested and killed, Micha Isiah, a 22-year-old undergraduate student of the Federal University of Technology, Owerri. The soldiers arrested the victim in Owerri while he was inflating the tyres of his vehicle, collected the sum of N800, 000 from him, and afterwards killed him to avoid implicating them. The unwholesome event took place in Ngor Okpala Local Government Area of Imo State (Ukpong, 2020; Emergency Digest, 2020).

4.3 South-South Nigeria

Rivers State recorded one case of unlawful murder during the lockdown. This is about the case of a female police officer, Lavender Elekwachi, who was shot dead by her colleague, Sergeant Bitrus Osaiah, on Thursday, April 23, 2020, while trying to enforce the Rivers State Government's movement restriction directive aimed to curtail the spread of coronavirus in the state. Like in many of the states, "...residents of Port Harcourt and other parts of River State continue[d] to complain about the manner the Rivers State Taskforce conducts[ed] their activities...they employ[ed] all forms of violence and force in order to achieve their aim and cause havoc in a disorderly manner" (Social Action, 2020, para. 6). Accordingly, Bitrus Osaiah shot and killed Lavender Elekwachi, who before her untimely death was nursing an 18-month-old baby, as the deceased attempted to stop her colleagues - members of the Task Force from destroying goods, wares and properties of some traders who had created temporary markets in the Eneka roundabout area. The area is under the jurisdiction of Eneka Police Division of the Nigeria Police Force in Obio/Akpora Local Government Area of River State. Bitrus Osaiah's unlawful action has been described as typically exemplifying the prevailing height of recklessness and unprofessionalism often displayed by men and officers of Nigeria's security agencies while on duty to enforce compliance with any given government directives (Social Action, 2020).

In Delta State, Joseph Pessu, a 28-years-old man, was murdered in cold-blood in Warri, on Thursday, April 2, 2020, by soldiers who were enforcing the government's stay-at-home directive in the state. The victim, Joseph Pessu, a father of two children, was shot dead by a soldier for allegedly disobeying the stay-at-home order imposed by the Delta State Government to stop further spread of the COVID-19 infection. The soldiers

had instructed Joseph Pessu to stop at a military checkpoint along the Ugbuwangue axis of the NPA Expressway while he - the deceased - drove a Toyota Camry car void of vehicle plate number. The victim, however, did not adhere to the order but tried to maneuver his way to beat the armed military men. In reaction, one of the soldiers shot at one of the car's back tyres, and Pessu allegedly continued driving and ran some metres farther before parking the car in the middle of the road to escape into nearby bush when one of the soldiers shot at him, killing him right at the spot (Aluko et al., 2020; Edremoda, 2020).

The illegal killing of Joseph Pessu by the soldiers attracted the attention of a prominent Nigerian human rights activist and current Minister of State for Labour and Employment, Festus Keyamo (SAN), also an indigene of Delta State, who overtly condemned and described the act as barbaric. In his words, the Minister poignantly states thus:

I condemn the killing of innocent person in Warri by soldiers enforcing the COVID-19 lockdown. I have received disturbing reports and imaged of the high-handedness and shooting of innocent citizens by men of the armed forces deployed to enforce the COVID-19 lockdown in my state, Delta. Specifically, I have received reports of the killing of an innocent young man, Mr Joseph Pessu, in Warri. I unreservedly condemn this barbaric act by men of the armed forces, who should exercise restraint when dealing with the civilian population (Aluko et al., 2020, para. 22-24).

Another young man was also beaten to death by officers of the Nigerian Army at Owa-Ekei in Ika Northeast Local Government Area of Delta State, for flouting the state government's COVID-19 restriction directive (Ebiri et al., 2020).

4.4 South-West Nigeria

Lagos State witnessed an incident of unlawful killing by security forces on May 20, 2020, when "... Fatai Oladipupo was killed by stray bullet along Obabiyi, Igando Road, Ikotun, Lagos by some police officers attached to the Ikotun police station who were attempting to enforce the 8:00 p.m. curfew in the area" (Ukpong, 2020, para. 10). Fatai Oladipupo, a 28-years-old Muslim Cleric, allegedly had his life suddenly terminated by a police inspector, Charles Okoro, in a shooting incident (Adediran, 2020). In Ogun State, the police has been held responsible for the death of a pregnant woman, Opeoluwa Waidat Adedeji, who died at a police checkpoint due to protracted delay and refusal by some policemen enforcing the coronavirus lockdown measures in the state, to allow her passage, on her way to the hospital for medical attention.

The incident happened on Thursday, May 21, 2020, in Waterside Local Government Area of Ogun State. Mrs Adedeji, a mother of six, before her death was a seven months pregnant. That day, she woke up at about 6:00am and discovered she was bleeding. Hence, she was rushed to Ita-Otu General Hospital, Ibiade, Ogun State by one of her sons on a commercial motorcycle to receive medical care (Kabir, 2020). However, on getting to the Sowore River police checkpoint, the policemen enforcing the anti-coronavirus directives delayed the pregnant woman and her son and the commercial motorcyclist rushing her to the hospital for hours despite their pleas to the law enforcement agents. The police officers had allegedly delayed them for not adhering to the state government's COVID-19 directives on the use of face masks and observance of social distancing. Although they were later passed, but the woman could not get to the hospital before she died with the pregnancy due to excessive loss of blood (Adeowu, 2020). The unwarranted death of Opeoluwa Waidat Adedeji sparked a protest by youth in the community who marched to the Abigi Divisional Police Headquarters with the corpse of the woman, declaring openly and vehemently that the policemen at the checkpoint caused her death (Adeowu, 2020; Kabir, 2020).

Relevant authorities have assured the public and the families of the victims of the above incidents of extrajudicial killings by Nigerian law enforcement agents during the nationwide coronavirus lockdown, that proper investigation would be conducted so that justice is tendered as regards to the cases. But currently the public is still in the dark regarding the outcomes of the supposed investigations on these cases of illegal killings of innocent citizens of Nigeria by security forces under the guise of trying to compel obedience to the restrictive orders put in place by government to contain the spread of the COVID-19 pandemic disease. Nevertheless, the general perception is that, as usual, the cases are likely to have been swept under the carpet, just as the majority of the previous cases that had been experienced in the country.

Table 2 shows the total numbers of cases of extrajudicial killings by men and officers of the Nigerian security agencies in the various regions of the country as at the time of completing this study.

Table 2: Total Numbers of Cases of Extrajudicial Killings by Nigerian Security Agencies in Different States of the Various Regions during the Covid-19 Nationwide Lockdown in Early 2020

Northern Nigeria	Nos. of Cases	South-East Nigeria	Nos. of Cases	South-South Nigeria	Nos. of Cases	South-West Nigeria	Nos. of Cases
Katsina	1	Abia	4	Rivers	1	Lagos	1
Kaduna	5	Anambra	3	Delta	2	Ogun	1
Nasarawa	1	Ebonyi	1	-	-	-	-
Plateau	1	Enugu	1	-	-	-	-
-	-	Imo	1	-	-	-	-
Total	8		10		3		2

Source: Authors' Compilation

The above table shows that the South-East (with 10 cases) recorded the highest incidence of extrajudicial killing by officers of security agencies during enforcement of government restriction order aimed at stemming the tide of the spread of the COVID-19 disease in Nigeria. Next to the South-East was the North (8 cases), and following the North was the South-South (3 cases), while the South-West (2 cases) was the least. At the state level, Kaduna (5 cases) saw the highest incidence of unlawful killings in Northern Nigeria, during the period, while Katsina, Nasarawa, and Plateau had 1 case each. In the South-East, Abia State (4 cases) recorded the highest, followed by Anambra (3 cases), while Ebonyi and Enugu witnessed 1 case each. In the South-South, Delta State (2 cases) was the highest, as Rivers State had just 1 case. Lagos and Ogun States in the South-West had 1 case each. This brings the total number of cases of extrajudicial killings by personnel of security agencies enforcing the government lockdown restrictions seen in Nigeria to 23 as at the time of completing this study.

5. DEDUCED IMPLICATIONS OF THE EXTRAJUDICIAL KILLINGS BY NIGERIA'S SECURITY FORCES

The above incidents of extrajudicial killings of Nigerians by the security agents deployed to enforce government's anti-coronavirus directives, goes with certain implications for the Nigerian state and its security forces in connection with human rights protection. Some important consequences of the illegal execution activities of the security forces are thus highlighted below.

Generally, the unwholesome trend vividly showcases the persistence of the entrenched culture of abuse and low-regard for the fundamental human rights of Nigerians by constituted authorities in the country. This is in spite of Nigeria's re-adoption and operation of the democratic system of governance since 1999, and being party and signatory to many global and regional legal instruments – treaties and conventions adopted for the protection and promotion of human rights. Authorities in Nigeria still pay ceremonial and lip services to human rights concerns, and this further worsens the country's human rights outlook in the global community.

Developments in the coronavirus pandemic period have revealed that Nigeria does not have any existing specific mechanisms for safeguarding human rights while responding to public health crisis. Hence, without prior preparation against potential public health emergencies of overarching effects as the coronavirus, the nation is bereft of appropriate measures to uphold and shield individual rights of the citizens from potential abuses by critical state actors including security agencies, while discharging their duties.

The COVID-19 era has further exposed the depth of the odious systemic practice of disproportionate use of force, brutalization, abuse of power and non-compliance with national and international laws, best practices and rules of civil-military relations by Nigerian security agencies, especially when carrying-out special assignments. The entire scenario indicates that security agencies in Nigeria still have a long way to go regarding embracing and inculcating in their officers the conventional standards and practices of engaging with civilian populations in crisis and/or critical times.

It can clearly be deduced that there is still a lack of proper orientation and understanding of the values and sanctity of human rights among Nigerian security forces, in spite of the more than nineteen years the country has parted ways with military rule. A key factor responsible for this is the minimal importance attached to in-house orientation programmes for men and officers of the security agencies on important issues such as human rights. Therefore, the violent and abusive habits with which security agents operated during the protracted period of military regime have become firmly engrained that the personnel are beclouded from understanding the grave consequences of violation of human rights of the citizens.

The current state of affairs has also exposed the inadequacies of the Nigerian justice system, especially with regard to the delay and under-carpeting syndromes in the system. Since these cases of extrajudicial

murders of innocent Nigerians were witnessed during the lockdown, necessary actions are yet to be taken to prosecute the culprits in appropriate courts of law. The signal this sends to Nigerians and the international community is that, there is no confidence in the country's judicial system; the citizens could have their fundamental human rights expressly violated without any assurance of obtaining justice and redress through the judiciary, which is supposed to be 'the hope of the common man'.

6. RECOMMENDED MEASURES

To checkmate the reoccurrence of the menace of extrajudicial killings by security personnel of Nigeria's security agencies amid the country's response to any possible national or international public health crisis in future times, the study recommends the following measures.

Relevant authorities need to take necessary actions to ensure that all the officers and men of the security agencies allegedly involved in the unlawful murders of Nigerians during the COVID-19 pandemic are duly prosecuted in competent courts of appropriate jurisdiction, and if found guilty, apportioned due punishment as obtainable under the law. This would serve as deterrence and caution to all personnel and/or actors in the nation's security sector at large. The action would also communicate to the international community that Nigeria does not treat issues of human rights abuses with levity, thereby improving the country's human rights record globally.

Civil society organizations in Nigeria working in the field of human rights defence and promotion should mobilize their members and the masses to demand all relevant government authorities to obtain justice for Nigerians killed unlawfully by security agents while enforcing the government anti-coronavirus restrictions. This should be conducted in the form of peaceful demonstrations to pressurize the government to bring all alleged culprits to book, should the government display reluctance to do so. The action would send a strong message to Nigerian government and its agencies about the improvement in the level of awareness among the masses of the citizenry regarding their rights, and the readiness not to tolerate any forms of violations of those rights by government actors, as well as to seek necessary redress accordingly.

The Nigerian judicial system should exhibit a positive outlook to treating all cases related to the illegal killings of the citizens by officials of security agencies involved in enforcing the government COVID-19 lockdown directives across the country. Specifically, the court should act fast; it should expedite actions to dispense judgment on all the cases as quick as possible. This would not only demonstrate to ordinary Nigerians that the government is genuinely committed to protecting their individual rights, it would also help to rebuild public trust and confidence in the country's judicial system as 'the hope of the common man' in the ultimate sense.

There is the need for adequate and continuous re-orientation and sensitization of the rank and file officers across Nigeria's security formations on the sanctity of human rights and the accepted norms in civil military relations in general. To this end, authorities of the security forces should institute robust compulsory in-house orientation and training programmes for frequent education and re-education of their new and old officers on human rights issues. This, perhaps, may be incorporated as a key criterion for promotion on the job, and for selecting their officers for special national assignments, especially activities that might be perceived to have potential impact on human rights of the citizens. Proper orientation would sharply improve their understanding of human rights issues vis-à-vis their responsibility to protect them as security actors, rather than involve in their violations. This step, if taken, would generally result in drastic reduction in the rate of illegal killings by the security agents.

Many of the victims of the unlawful killings orchestrated by the security agencies during the lockdown were the bread winners of their respective families. Hence, governments of states where the cases were recorded should design schemes to assist the affected families. This could be in the form of creating a special fund to take care of the education and other endeavours of the victims' family members, especially their wives, children and wards to give them hope of survival and for a better future.

7. CONCLUSION

The COVID-19 pandemic disease is currently the biggest global public health emergency that the world has had to grapple with. Following its rapid spread from Wuhan, China, to other countries coupled with the unique characteristics and causalities the infection has caused the world's people, the World Health Organization at the early stage of the outbreak described the disease as a global pandemic, calling on, and directing governments of nations on how to contain it. In Nigeria, governments at all levels, majorly the federal and state governments are making commendable efforts in their respective capacities to curtail the spread of

the deadly coronavirus disease within the country since March 2020, when a few cases of the infection were initially confirmed in the country. However, Nigeria's response to the coronavirus pandemic has produced mixed results as government measures have resulted in unprecedented human rights violations.

In particular, incidents of extrajudicial killings arising from the activities of the men and officers of security agencies deployed to enforce the government's country-wide COVID-19 lockdown order, has become quite alarming. The unlawful murders of the citizens they are meant to protect in such an emergency situation as this holds grave consequences for the Nigerian state and its security institutions in connection with the country's human rights record both at the national, regional and global levels. Apart from defeating the essence of state security in Nigeria, the situation also defeats the very essence of the involvement of the security forces in the fight against the coronavirus disease, compounds the country's human rights problem and places the Nigerian security agencies better as 'predators' rather than 'protectors' of the citizens. Notwithstanding, the present study is optimistic that the adoption and adequate implementation of the measures put forth by it would help to forestall the menace now and in future times.

REFERENCES

- Abuh, A. (2020). *Group Cries Out to IGP, DSS Boss over Alleged Extra-Judicial Killings in Ebonyi Communities*. [Online URL: <https://guardian.ng/news/group-cries-out-to-igp-dss-boss-over-alleged-extra-judicial-killings-in-ebonyi-communities/>] accessed on May 19, 2020.
- Adama, D. S. (2020). *Anger, Protests over Killing of Unijos Student*. [Online URL: <https://dailytrust.com/anger-protests-over-killing-of-unijos-student>] accessed on May 17, 2020.
- Adediran, I. (2020). *Police Inspector Arrested for Allegedly Killing Cleric*. [Online URL: <https://www.premiumtimesng.com/news/more-news/394024-police-inspector-arrested-for-allegedly-killing-cleric.html>] accessed on June 13, 2020.
- Adeowu, A. (2020). *Ogun State Lockdown: Pregnant Woman in Labour Dies at Police Checkpoint*. [Online URL: <https://allnigeriainfo.ng/ogun-state-lockdown-pregnant-woman-in-labour-dies-at-police-checkpoint/>] accessed on July 8, 2020.
- Agwu, C. (2020). *Covid-19 Taskforce Kills 1, Injures 2 in Ebonyi*. [Online URL: <https://www.sunnews.com/covid-19-taskforce-kills-1-injures-2-in-ebonyi/>] accessed on June 29, 2020.
- Ahovi, I. A. (2020). *Soldier Allegedly Kills UNIJOS Student During Lockdown in Jos*. [Online URL: <https://guardian.ng/news/soldier-allegedly-kills-unijos-student-during-lockdown-in-jos/>] accessed on May 17, 2020.
- Aluko, O., Ogunyemi, D. and Meluwa, O. (2020). *Lockdown: Soldier Shoots Motorist Dead in Delta*. [Online URL: <https://punchng.com/lockdown-soldier-shoots-motorist-dead-in-delta/>] accessed on July 10, 2020.
- Appiagyei-Atua, K., Muhindo, T. M., Oyakhirome, I., Kabachwezi, E. K. and Buabeng-Baidoo, S. (2017). State security, securitization and human security in Africa: The tensions, contradictions and hopes for reconciliation. *Global Campus Human Rights Journal* 1(2): 326-349.
- BBC News. (2020). *Coronavirus: Security Forces Kill More Nigerians Than Covid-19*. [Online URL: <https://www.bbc.com/news/world-africa-52317196>] accessed on July 8, 2020.
- Corporate Finance Institute Team (CFI Team). (n.d.). *Utilitarianism*. [Online URL: <https://corporatefinanceinstitute.com/resources/knowledge/other/utilitarianism/>] accessed on July 3, 2020.
- Daka, T., Akingboye, O., Alabi, A. and Godwin, A. (2020). *Gradual Easing of Lagos, Ogun and Abuja Lockdown Begins Monday*. [Online URL: <https://guardian.ng/news/gradual-easing-of-lagos-ogun-abuja-lockdown-begins-saturday/>] accessed on June 29, 2020.
- Dersso, S. A. (2008). Interface between Human Security and Human Rights: A Conceptual Overview. In *Promotion of Human Security in Africa: The Role of African Human Rights Institutions. Monograph No 145*, edited by S. A. Dersso, pp. 3-7. Pretoria: Institute for Security Studies.
- Ebiri, K., Godwin, A., Akpan-Nsoh, A., Osahon, J., Todo, A., Neme, S., Okafor, C., Njoku, L., Ogugbuaja, C., Udeaja, G., Akpa, N., Agboluaje, R. and Afolabi, A. (2020). *Infected or Uninfected: COVID-19 Halts Life for All*. [Online URL: <https://guardian.ng/features/infected-or-uninfected-covid-19-halts-life-for-all/>] accessed on May 21, 2020.
- Edremoda, E. (2020). *COVID-19 Lockdown: Soldier Allegedly Murders Man in Delta*. [Online URL: <https://thenationonlineng.net/covid-19-lockdown-soldier-allegedly-murders-man-in-delta/>] accessed on July 12, 2020.
- Emergency Digest. (2020). *How Soldier, 4 Others Killed Imo Undergraduate over N800,000*. [Online URL: <https://emergencydigest.com/2020/05/22/soldier-killed-undergraduate/>] accessed on June 14, 2020.
- Ignatieff, M. (2004). *The Lesser Evil: Politics in an Age of Terror*. Princeton: Princeton University Press.

- Industrial Global Union Affiliate. (2020). *Union Seeks Justice for Worker Shot Dead by Police in Nigeria*. [Online URL: <http://www.industrial-union.org/union-seeks-justice-for-worker-shot-dead-by-police-in-nigeria>] accessed on May 19, 2020.
- Jimoh, A. M. (2020). *COVID-19: Abaribe Kicks Against Police Brutality, Killings in South East*. [Online URL: <https://guardian.ng/news/covid-19-abaribe-kicks-against-police-brutality-killings-in-south-east/>] accessed on May 23, 2020.
- Julia, D. (2014). *The History of Utilitarianism* [Online URL: <https://plato.stanford.edu/entries/utilitarianism-history/>] accessed on July 3, 2020.
- Kabir, A. (2020). *COVID-19: Pregnant Woman Dies in Ogun After Police Checkpoint Delay*. [Online URL: <https://www.premiumtimesng.com/regional/ssouth-west/394053-covid-19-pregnant-woman-dies-in-ogun-after-police-checkpoint-delay.html>] accessed on June 29, 2020.
- Kola, O. (2020). *COVID-19: Nigeria Announces Lockdown of Major Cities; Confirmed Cases of Coronavirus Rise to 111, Say Authorities*. [Online URL: <https://www.aa.com.tr/en/africa/covid-19-nigeria-announces-lockdown-of-major-cities/1784358>] accessed on June 29, 2020.
- Lazarus, L. and Goold, B. J. (2007). *Introduction: Security and Human Rights: The Search for a Language of Reconciliation*. In *Security and Human Rights*, edited by B. J. Goold and L. Lazarus, pp. 1-24. United Kingdom: Hart Publishing.
- Nathanson, S. (n.d.). *Act and Rule Utilitarianism*. [Online URL: <https://www.iep.utm.edu/util-a-r/>] accessed on July 3, 2020.
- National Commission on Terrorist Attacks Upon the United States. (2004). *The 9/11 Commission Report: Final Report of the National Commission on Terrorist Attacks Upon the United States (9/11 Report)*. [Online URL: <https://govinfo.library.unt.edu/911/report/911Report.pdf>] accessed on June 5, 2020.
- National Human Rights Commission. (2020). *National Human Rights Commission Press Release on COVID-19 Enforcement so far Report on Incidents of Violation of Human Rights*. [Online URL: <https://www.nigeriarights.gov.ng/nhrc-media/press-release/100-national-human-rights-commission-press-release-on-covid-19-enforcement-so-far-report-on-incidents-of-violation-of-human-rights.html>] accessed on May 16, 2020.
- Nwachukwu, J. O. (2020). *COVID-19: NUPENG Reacts as Police Kills Member in Aba*. [Online URL: <https://dailypost.ng/2020/04/08/covid-19-nupeng-reacts-as-police-kills-member-in-aba/>] accessed on May 7, 2020.
- Nwakanma, S. and Okafor, T. (2020). *Bribe-seeking Abia NSCDC Officer Shoots Dead Commercial Driver*. [Online URL: <https://punchng.com/bribe-seeking-abia-nscdc-officer-shoots-dead-commercial-driver/>] accessed on July 11, 2020.
- Odu, I. (2020). *Tension in Enugu as Police Shoots 27-yr-old Law Student to Death*. [Online URL: <https://www.vanguardngr.com/2020/05/tension-in-enugu-as-policeman-shoots-27-yr-old-law-student-to-death/>] accessed on May 10, 2020.
- Ogugbuaja, C. (2020). *Youths Play Police Killings in South East*. [Online URL: <https://guardian.ng/news/youths-flay-police-killings-in-south-east/>] accessed on July 17, 2020.
- Olaniyan, S. (2020). *One Dead, Police Station, Vehicles Set Ablaze in Katsina*. [Online URL: <https://www.independent.ng/one-dead-police-station-vehicles-set-ablaze-in-katsina/>] accessed on June 8, 2020.
- Omilana, T. (2020). *FG May Relax Interstate Ban on June 21*. [Online URL: <https://guardian.ng/news/fg-may-relax-interstate-ban-on-june-21/>] accessed on June 29, 2020.
- Overseas Security Advisory Council. (2020). *Health Alert: Nigeria, Two Week Ban on Interstate Movement Effective Immediately*. [Online URL: <https://www.osac.gov/Country/Nigeria/Content/Detail/Report/8da01754-2057-46fe-a99d-1883fc35105f>] accessed on June 29, 2020.
- Oyelude, O. (2020). *Coronavirus: One Killed as Katsina Protesters Burn Police Station over Jumat Ban*. [Online URL: <https://punchng.com/coronavirus-one-killed-as-katsina-protesters-burn-police-station-over-jumat-ban/>] accessed on May 13, 2020.
- Ramcharan, B. (n.d.). *Security and Human Rights*. [Online URL: <https://www.un.org/ruleoflaw/files/Ramcharan.pdf>] accessed on May 24, 2020.
- Ramcharan, B. (2004). *Human Rights and Human Security*. [Online URL: <http://www.igntu.ac.in/eContent/IGNTU-eContent-783614251536-MA-PoliticalScience-2-Dr.NameirakpamSurjitkumar-Paper204ContemporaryIssues&TrendsInGlobalPolitics-4.pdf>] accessed on July 4, 2020.
- Ridge, M. (2002). Mill's intentions and motives. *Utilitas* 14(1): 54-70.
- Sahara Reporters. (2020). *Five Killed in Kaduna As Police, Youth Clash During Coronavirus Lockdown Enforcement*. [Online URL: <http://saharareporters.com/2020/04/06/five-killed-kaduna-police-youth-clash-during-coronavirus-lockdown-enforcement/>] accessed on July 8, 2020.

- Social Action. (2020). *Human Rights Violations During COVID-19 Lockdown in Nigeria*. [Online URL: <http://saction.org/human-rights-violations-during-covid-19-lockdown-in-nigeria/>] accessed on May 15, 2020.
- Tardi, C. (n.d.). *Utilitarianism: What It Is, Founders, and Main Principles*. [Online URL: <https://www.investopedia.com/terms/u/utilitarianism.asp>] accessed on July 3, 2020.
- Teson, F. R. (2005). Liberal Security. In *Human Rights in the 'War on Terror'*, edited by R. A. Wilson. pp.57-77. Cambridge: Cambridge University Press.
- Trobbiani, R. (2013). *How Should National Security and Human Security Relate to Each Other?* [Online URL: <https://www.e-ir.info/2013/04/26/how-should-national-security-and-human-security-relate-to-each-other/>] accessed on June 29, 2020.
- Ukpong, C. (2020). *COVID-19: Nigerian Soldiers Allegedly Flog Food Seller to Death*. [Online URL: <https://www.premiumtimesng.com/news/headlines/396613-covid-19-nigerian-soldiers-allegedly-flog-food-seller-to-death.html>] accessed on July 8, 2020.
- West, H. R. (n.d.). *Utilitarianism*. [Online URL: <https://www.utilitarianism.com/utilitarianism.html>] accessed on July 3, 2020.