VOODOO AND HUMAN TRAFFICKING IN NIGERIA AS IMPEDIMENTS TO EFFECTIVE ADMINISTRATION OF JUSTICE

O. OGWEZZY

Oluwatosin OGWEZZY

Doctoral Candidate, Faculty of Law, Rivers State University, Nkpolu-Oroworukwo, Port Harcourt. Formerly, Lecturer/Facilitator, Faculty of Law, National Open University of Nigeria (NOUN), Port Harcourt Study Centre.

E-mail:ogwezzytosin@gmail.com

ABSTRACT

Voodoo is the major factor that makes human trafficking to thrive in Nigeria. Voodoo is regularly used by traffickers in human trafficking to exert pressure over the victims. The use of voodoo is a form of mental coercion aim at reducing the need to use physical violence. The adverse power exerted over the trafficked victims is so enormous that they dare not disobey the trafficker. In this manner, the Nigerian networks can control their victim from a distance and no additional person is required to supervise them. This paper concludes that the use of voodoo by traffickers impedes effective administration of justice. Voodoo does not allow victims of human trafficking to reveal the identities of the trafficker so that the law enforcement agencies would not arrest and prosecute them.

KEYWORDS: voodoo, human, trafficking, administration, justice.

INTRODUCTION

Voodoo is regularly used by traffickers in human trafficking to exert pressure over the victim. voodoo in human trafficking binds the victims to the trafficker, and oblige them to respect their promises before they leave the origin country for their destination country. Promises made during the voodoo rituals are equal to a contract, which cannot be broken, between the trafficker and their victim. It is regarded as a source of security and certainty for the trafficker in human beings The fear instilled in the mind of victims by really impedes the effective administration of justice which makes victims to be silent with respect to the identities of traffickers which prevents the traffickers from being arrested and prosecuted by the law enforcement agencies.

1. Nature of voodoo

The origins of voodoo rites date back to ancient time and voodoo rites originally had a positive function in the traditional Nigerian communities and were practiced to defend the good.¹ Voodoo which is locally regarded as juju is a traditional religion in West Africa where it has been practised for many years. In Africa particularly Nigeria it is recognised that spirits or gods are believed to govern the earth and every aspect of the existence of man. They may protect people or punish them. Juju is deeply ingrained in our society particularly in Edo State, and many Nigerians, irrespective of their social class or education level, believe in it.² In general, the purpose of voodoo was to prevent suffering and illness caused by epidemic diseases through purges and vow-making during which the presence of the gods was evoked.

¹E.L, Iacono, 'Victims, Sex Workers and perpetrators: Gray Areas in the Tafficking of Nigerian Women' [2014](17)*Trends Organ Crim*, 110–128 <u>https://doi.org/10.1007/s12117-014-9212-1 accessed</u> 7 May 2022. ²United Kingdom Home Office, Country information and Guidance Nigeria:Traficking of women

August 2016, Version 1.0, https://www.refworld.org/docid/57b710594.html> accessed 10 May 2022.

During the western colonialism and the forced deportation of Africans, the old rituals and the cult of spirits helped the deported people to resist persecution and oppression.³ With regard to the protective functions of voodoo, it has been observed that each step or element related to traveling abroad for example border control, passports, visas and air tickets are still regarded by Africans as something that belongs to the realm of spiritual empowerment.⁴ A voodoo ritual process is therefore considered an essential step before leaving their country of origin to ensure trouble-free travel. Recently, the modern, negative interpretation of voodoo which is evident among Nigerian migrants stems from its current role in international trafficking. It originates in Africa where traffickers use voodoo as an element of control over victims of human trafficking. ⁵Voodoo basically consists of an oath taking in the presence of a traditional priest, in which victims swears to pay off their debts to the trafficker, obedient and loyal to the trafficker.⁶

1.1. Voodoo Ceremonies

Voodoo is used to control victims of human trafficking and voodoo ceremony is a multidimensional and supernatural event with far-reaching aftermath. The voodoo ceremony commences immediately the victim is brought before the juju priest to the shrine. The ritual process commences with the beating of drums, singing and enchantments.⁷It involves utilisation of herbs and plants prepared by the voodoo priest.⁸ The voodoo ritual process can be frightening and compel the victims of human trafficking to be obedient and t are intended to cause fear and worry.⁹The victim is instructed to undress, which puts fear in the victim.¹⁰A soot is prepared by the voodoo priest and the priest thereafter calls upon a spirit, aligned with the evil god Eshu, to enter the soot.¹¹Numerous cuts with a razor blade all over the victim's body by the vodoo priest, and the priest rubs the soot purportedly containing the spirit, into the open wounds.¹² It is believed that in this way the spirit enters the victim's body and she can never escape from the spirit.

1.2. Efficacy of Voodoo or otherwise in Human Trafficking

One essential characteristic of the Nigerian trafficking system is the use of threats of voodoo curses to control Nigerian victims and force them into situations of prostitution. In fact, once arrangements for victims' trips abroad are completed, traffickers seal the deal by taking the victims to shrines of voodoo priests for oath taking.¹³ It is the oath-taking ritual through the use of voodoo that is making the Nigerian human trafficking industry to thrive.¹⁴The country's trafficking ring would have long been busted and traffickers driven underground if the use of voodoo has not been very effective in human trafficking network

³United Kingdom Home Office (n 2).

⁴Iacono (n 1)120.

⁵Iacono, 121.

⁶Ibid.

⁷O.J Agbeyegbe, 'Finding a voice: From Africa to Europe the effect of voodoo secrecy oath sworn by victims of sex Trafficking 'at International Human Trafficking and Social Justice Conference September 2018, held at Toledo Ohio

⁸Ibid.

⁹J.Millett-Barrett, 'Bound by Silence: Psychological Effects of the Traditional Oath Ceremony Used in the Sex Trafficking of Nigerian Women and Girls,'[2019](4)(3) *Dignity: A Journal on Sexual Exploitation and Violence* 24, <u>https://digitalcommons.uri.edu/dignity/vol4/iss3/3</u> accessed 9 May 2022.

¹⁰Marcel van der Watt & B. Kruger, 'Exploring 'juju' and Human Trafficking: Towards a Demystified Perspective and Response' South African Review of48:2, 70-86, DOI: Sociology, <u>10.1080/21528586.2016.1222</u>913, < juju ceremony. http://www.antitraffickingconsultants. co.uk JuJu Ceremony.pdf>accessed 11 May, 2022.

 $^{^{11}}Ibid.$

 $^{^{12}}Ibid.$

¹³United Kingdom Home office (n 2).

¹⁴M.Mojeed, 'Voodoo aids Human Trafficking' < http://lastradainternational.org>accessed 6 January 2022.

VOODOO AND HUMAN TRAFFICKING IN NIGERIA AS IMPEDIMENTS TO EFFECTIVE ADMINISTRATION OF JUSTICE

The efficacy of the oaths taken also relies on the beliefs of participants involved in the process of the ritual, it speaks to the performativity of the oath taking ritual, viewed as episodes of cultural communication that seeks to send a message to its participant but can only be understood by such participants that possess a 'shared' belief, culture or tradition.¹⁵ One of the means of recruiting women and children is to subject them to a traditional oath of silence ceremony at the voodoo shrine. This control element is to silence victims and trap them in debt bondage and it has been extremely effective in its implementation. Victims are subjected to the oath prior to their departure from Nigeria to ensure debt commitment and non-disclosure of the identity of the traffickers.¹⁶ The traffickers who use voodoo on the victims as element of control succeeds because the victim finds it very difficult to reject the oath -taking.¹⁷The victim of human trafficking also see the trafficker as a 'helper' or 'good Samaritan' .The victim on their on volition even volunteer to take the oath to reassure the trafficker of their allegiance in exchange for an anticipated opportunity for a enhanced life.¹⁸ The belief of finding an improved life in Europe has been inculcated for many years in human trafficking with the help of madams who returned to Nigeria to recruit girls after living in Europe.¹⁹

The Juju is a major control mechanism for traffickers, and family members are more and more often involved in the rituals, which makes the victims of human trafficking feel that they are endangering their loved ones if they reveal the identity of the traffickers.²⁰ The voodoo priests are enforcers for the contract. Juju as a control mechanism ensures the victim's loyalty in a hidden manner that is difficult for the authorities to uncover and to prove in criminal prosecutions of traffickers.²¹ The victims of human trafficking do not appear to be subjected to any kind of control when you see them physically. They appear to enjoy freedom of movement and many of them carry their own papers which is their identity.²² However, the subjugation and control exerted over them is subconscious, based on the spiritual and material consequences that breaking the oath would bring for the victims, their families and future generations.²³The victims are very fearful of the power of voodoo, and the tragedy that will befall them if they do not comply with the conditions of voodoo done in the shrine by the voodoo priest.²⁴The traffickers tell the victims that if they do anything contrary they will invoke the spirit of voodoo. Which shall result in death, illness, misfortune to the victim and their families.²⁵

2. Voodoo in Human Trafficking as impediments to Effective Administration of Justice

One of the fundamental factor that is making human trafficking business to thrive very well in Nigeria is the use of voodoo.²⁶ Voodoo acts as impediments to effective

¹⁵C .Olufade, 'Sustenance of Sex Trafficking in Edo State: The Combined Effect of Oath taking, Transnational Silence and Migration Imaginaries on Trafficked women in Edo State'<<u>https://hal.archives-ouvertes.fr/hal-03313374</u>>accessed 11 May 2022.

¹⁶N.H Msuya, 'Traditional "juju oath" and Human Trafficking in Nigeria: A Human Rights Perspective' [2019] *De Jure Law Journal* 138-162.

¹⁷M. Ikeora, 'The Role of African Traditional Religion and ' juju' in Human Trafficking:Implications for Anti Trafficking '[2016])(17)(1) Journal of International Women Studies 8

¹⁸Ikeora(n 17).

¹⁹Millet (n 9), 14.

 $^{^{20}}Ibid.$

 $^{^{21}}Ibid.$

²²Millet (n 9), 14

 $^{^{23}}Ibid.$

²⁴P.A Anyebe, 'Voodoo and Human Trafficking in Nigeria: A Nation's Albatross' [2015](3) (2) *Journal of Social Welfare and Human Rights* 33-55..

²⁵Anyebe (n 24), 47.

²⁶M.Mojeed, 'Voodoo aids Human Trafficking' http://lastradainternational.org>accessed 11 May 2022).

administration of justice. In Nigeria, the human trafficking business is a very serious and really thriving because of the use of voodoo. Immediately arrangements for victims' travels abroad are completed, traffickers seal the deal by taking the victims to shrines of voodoo priests for oath taking.²⁷ The, victims are made to swear that they would conceal the identities of their traffickers to anyone if eventually arrested whether in the origin country, in course of the journey or in the destination countries.²⁸

The use of voodoo as an element of control by traffickers on victims are very big problems for law enforcement officials to get victims to testify against their traffickers. ²⁹Witnesses brought to court are unable to give testimony due to the fear that they will break an oath and eventually invite misfortune upon themselves and their families. The belief in voodoo has been a strong impediment to the prosecution of traffickers, because any law enforcement officer cannot prosecute when nobody is willing to come forward to say that voodoo has been used on him or her. ³⁰

In Nigeria, the crime of human trafficking cases are difficult to prosecute because our law enforcement agencies are yet to understand the concept of voodoo and the mind-set of the victim in respect of voodoo in order to gain their trust and hope to gather enough evidence.³¹ The consequences of this oath taking are not just destructive to the trafficked persons, yet it is impediment to the anti-trafficking measures, particularly for law enforcers and policy implementers. ³²The fear and intimidation that voodoo creates serve as an obstruction to investigate, arrest and prosecute traffickers. The voodoo is a great set back to successful arraignment and prosecution of trafficker since the victim who has been a star witness is unwilling to reveal the ordeal as result of the fear of juju. ³³ It likewise serves as an impediment to the protective measures put in place for the victims. The investigation used to be upset since victims are terrified to give reliable information to enforcement officers because of the voodoo oath coerced on them. ³⁴ The victims of human trafficking muddle up vital information that they decide to give, and that enables the traffickers to get away from being convicted. The absence of evidence as a result of victims trusting the oath of secrecy. ³⁵

The use of voodoo by traffickers render the victims powerless.³⁶The traffickers seize the documents of the victims when they arrive the destination country.³⁷ When the victims find themselves in a foreign country lacking a network of friends and family, destitute, without documentation, unable to speak the language, and emotionally and physically down from the violence experienced during the course of moving from one country to another they become distressed³⁸ and are at the mercy of the traffickers. Voodoo which is used as as a control mechanisms by traffickers coerce the victims of human trafficking and generate a power versus powerless strong force throughout the recruitment, trafficking, and enslavement

³⁰A.T Nwaaubani, 'A Voodoo curse on Human Traffickers'< <u>https://www.nytimes.com/2018/03/24/opinion/sunday/voodoo-curse-human-traffickers.html>accessed</u> 24 February 2022.

³³Ibid. ³⁴Ibid.

³⁶Millet (n 9), 25.

²⁷Ibid.

 $^{^{28}}Ibid.$

²⁹E.W, Harrop, Ties that bind: African Witchcraft and Contemporary Slavery, Liberty and Humanity [2012] http://libertyandhumanity.com/themes/humantrafficking/ties-that-bind-african-witchcraft-and-contemporary-slavery/ accessed 11 May 2022 .

³¹Nwaaubani(n 30).

³²U.M Usman et al., 'Traficking Twin Error:Mysterious Madam and Voodoo Victimisation in the case of Nigeria'[2018](8)(1)*Journal of Public Administration and Governance*,403.

³⁵Ibid.

³⁷Millet (n 9), 25.

³⁸Millet (n 9), 25.

VOODOO AND HUMAN TRAFFICKING IN NIGERIA AS IMPEDIMENTS TO EFFECTIVE ADMINISTRATION OF JUSTICE

process. ³⁹From the moment the recruiter indicates he has connections to traffic the victims for a better life, he has established a position of power.⁴⁰

From there, God and the deities are to be feared and obeyed.⁴¹A victim in which voodoo has been administered upon will refuse to cooperate with prosecution as a witness in court. ⁴² In court, a victim of human trafficking who is regarded as a a major witness in a criminal trial to testify against the trafficker may refuse to appear in court or cooperate with law enforcement agents.⁴³The victim of human trafficking who is a relevant evidence of exploitations against the traffickers when brought before the court is first of all afraid in the physical structure of the court room for instance, the manner in which the judge is dressed in wig with cream or white colour and gown with black or red colour .Standing before the public in an open court to see lawyers ,litigants or other witnesses also instills further fear in the victim because of the use of voodoo and that will enable the victim refuse to cooperate with the investigation by answering questions put to the victim knowing fully well the consequences of breaking the oath.⁴⁴ This is as result strong belief in the voodoo.⁴⁵

The voodoo is meant to create fear in the victims to obey, be subservient and "loyal" to their traffickers, to ensure full exploitation of the victim without fear of detection by the law enforcement officers.⁴⁶ Victims of human trafficking in which voodoo has been administered or used upon have no confidence in our law enforcement officers, who sometimes do conclude that victims are with limited information.⁴⁷ While some victims usually capitalised on such flimsy claims of voodoo to avoid enforcement officers or to seek asylum. Victims who could not give necessary evidence as a result of voodoo are more substantial number, which impedes protection and assistance, halting the implementation of NAPTIP trafficking policies.⁴⁸ It also prevents prosecution, and makes it impossible to convict traffickers and this gives a setback to the protection of victims.⁴⁹

Victims of human trafficking are not only traumatised by their oath but also by the exploitation they have been subjected to abroad as sex workers, and this is the reason why many victims abstain from giving evidence against traffickers. Most of the prosecuted cases against traffickers are as a result of the collaboration of the voodoo priests who served as our witnesses in court.⁵⁰

The traffickers use voodoo to control the victim when she is out of physical reach. Within the minds of the victims, the voodoo oath is the same irrespective of where the victims are residing and this is the reason why most of the victims will not cooperate with the authorities in destination countries.⁵¹

³⁹Ibid.

 $^{^{40}}Ibid.$

⁴¹Ibid.

⁴²S.K,Kigbu, 'Challenges in investigating and prosecuting Trafficking in persons cases in Nigeria'[2015](38)*Journal of Law,Policy and Globalisation*,146-157.

⁴³*Ibid*,152.

⁴⁴Kigbu (n 42),153.

⁴⁵*Ibid*.

⁴⁶Kigbu (n 42),153. ⁴⁷Usman (n 32) 404.

⁴⁸Usman (n 32) 404.

⁴⁹*Ibid*.

⁵⁰Danish Immigration Service,Protection of Victims of Human Trafficking in Nigeria:Report from Danish Immigration Fact Finding Mission to Lagos.Benin City and Abuja Nigeria 9 -26 September2007.< https://www.ecoi.net/en/document/1280377.html>accessed 19 May 2022

 $^{5^{1}}$ *Ibid*.

In human trafficking network, voodoo is employed as a form of psychological control mechanism aimed at oppressing victims ⁵² Voodoo makes victim psychologically and spiritually bound to their traffickers. The act of being controlled by voodoo depicts that the victims of human trafficking do not legally consent to their continuous exploitation which is a key characteristic of human trafficking as defined by article 3(b) of the United Nations Protocol to Prevent, Suppress and Punish human trafficking.⁵³ It is also important to state here that the nature of threats though more of a psychological nature rooted in superstitions, are believed to have physical manifestations including death of the victim, if they cooperate with law enforcement agencies.⁵⁴

It has also been acknowledged that although it is common for parties in a civil agreement to rescind their contractual obligations which will not be favourable to their interest, they are more unwilling to rescind where such contracts are concluded by oaths before a voodoo priest.⁵⁵ The unwillingness to rescind the contract is deeply rooted in traditional beliefs about deities whose judgments are believed to be immediate and catastrophic.⁵⁶ The potency of belief in voodoo lies primarily in the strong attachment and commitments to tradition and cultural life by Nigerians and Africans as a whole. Most of the victims are from a social environment where issues surrounding superstitions are taken seriously. As a result of this, irrespective of the inhuman treatment at the hands of their traffickers, victims are reluctant to seek assistance or cooperate with NAPTIP officials and other law enforcement agencies. Evidences have shown that victims involved in voodoo ritual process experience less violence from their traffickers when compared to victims not involved in voodoo ritual process, as the fear of the voodoo keeps them under control.⁵⁷ Accordingly, even in situations where the perpetrators have been arrested and NAPTIP officials depends on the testimony of the victim, they still maintain their refusal to testify against their traffickers because of their belief in the oaths taken by them and the potency of such oath which they believe will lead to their death or that of a close family relative or in some instances, insanity.⁵⁸

Furthermore, because of the psychological nature of voodoo, no victim can be said to be safe from the subjective fear of the oath. Even though a victim gets the opportunity to remain abroad by legal means for instance if she is granted asylum because she has testified against traffickers would still fear that the voodoo priest is capable of killing her no matter where she might be.⁵⁹

⁵²UNHCR 'Voodoo, Witchcraft and Human Trafficking in Europe' New Issues in Refugee Research, Research Paper no. 263, October 2013.< <u>https://www.ecoi.net/en/file/local/1079285/1930_1382531731_526664234</u> pdf>accessed 24 March, 2022..

⁵³ M. Van der Watt and B.Kruger Exploring 'Juju' and Human trafficking: Towards a Demystified Perspective and Response' [2017] (48) *South African Review of Sociology* 70-86.

⁵⁴United Nations Human Rights Office of the High Commissioner, *The Protection of Victims and Witnesses: A Compilation of Conference Reports and Consultations in Uganda* (2010) 83.

http://www.uganda.ohchr.org/Content/publications/WitnessAndVictimProtectionInUganda.pdf. accessed 19 May 2022

⁵⁵O.Abe, and S.Ouma, 'A re-assessment of the impact and potency of traditional dispute resolution mechanisms in post-conflict Africa' [2017] 6 *Ave Maria International Law Journal* 11. ⁵⁶*Ibid*

⁵⁷Finnish Immigration Service Country Information Human Trafficking of Nigerian Women to Europe <<u>https://migri.fi/documents/5202425/5914056/60332</u>

<u>Suuntaus NigSuuntaus HumanTraffickingfromNigeriaFINAL200415.pdf/8f310379-7101-447b826c-5d34a12ab8ab></u>accessed 24 March 2022.

⁵⁸S. O,Oyakhire Expanding The Scope Of 'Appropriate Measures': Do Traditional Institutions Play A Role In Facilitating The Protection Of Witnesses Of Trafficking *Journal of Comparative Law in Africa*[2019](6)(2) 80-103.

⁵⁹Danish Immigration Service (n 50).

VOODOO AND HUMAN TRAFFICKING IN NIGERIA AS IMPEDIMENTS TO EFFECTIVE ADMINISTRATION OF JUSTICE

CONCLUSIONS

Victims of human trafficking are not only traumatised by their oath taken during the voodoo ceremonies but are also subjected to exploitation by traffickers to travel to abroad as sex workers, to enjoy good and comfortable life. This is the reason why many victims abstain from giving evidence against traffickers and reveal the identity of the traffickers in court of law. Most of the prosecuted cases against traffickers are as a result of the collaboration of the voodoo priests who served as our witnesses in court. Investigators in NATIP are regularly threatened by traffickers who send threat letters and make calls warning them to slow down on the fight against human trafficking or be prepared to lose their lives. "Prepare for war. Your family will get the result.⁶⁰

BIBLIOGRAPHY

- United Kingdom Home Office, Country information and Guidance Nigeria: Traficking of women August 2016, Version 1.0, https://www.refworld.org/docid/57b710594.html [accessed 10 May 2022]
- E.L, Iacono, 'Victims, Sex Workers and perpetrators: Gray Areas in the Tafficking of Nigerian Women' [2014](17)Trends Organ Crim, 110–128 https://doi.org/10.1007/s12117-014-9212-1 [accessed 7 May 2022]
- 3. J.Millett-Barrett, 'Bound by Silence: Psychological Effects of the Traditional Oath Ceremony Used in the Sex Trafficking of Nigerian Women and Girls,'[2019](4)(3) Dignity: A Journal on Sexual Exploitation and Violence 24, https://digitalcommons.uri.edu/dignity/vol4/iss3/3 [accessed 9 May 2022]
- 4. M. Mojeed, 'Voodoo aids Human Trafficking' https://documentation.lastradainternational.org/lsidocs/Nigeria.pdf [accessed 22 January 2022]
- Marcel van der Watt & B. Kruger, 'Exploring 'juju' and Human Trafficking: Towards a Demystified Perspective and Response' South African Review of Sociology, 48:2, 70-86, DOI: 10.1080/21528586.2016.1222913, juju ceremony. <u>http://www.antitraffickingconsultants.co.uk_JuJu_Ceremony.pdf</u> [accessed 11 May, 2022]
- 6. O.J Agbeyegbe, 'Finding a voice: From Africa to Europe the effect of voodoo secrecy oath sworn by victims of sex Trafficking 'at International Human Trafficking and Social Justice Conference September 2018, held atToledo Ohio
- C. Olufade, 'Sustenance of Sex Trafficking in Edo State: The Combined Effect of Oath taking, Transnational Silence and Migration Imaginaries on Trafficked women in Edo State' <u>https://hal.archives-ouvertes.fr/hal-03313374</u> [accessed 11 May 2022]
- 8. N.H Msuya, 'Traditional "juju oath" and Human Trafficking in Nigeria: A Human Rights Perspective' [2019] *De Jure Law Journal* 138-162.
- 9. M. Ikeora, 'The Role of African Traditional Religion and ' juju' in Human Trafficking:Implications for Anti Trafficking '[2016])(17)(1)Journal of International Women Studies 8
- 10. P.A Anyebe, 'Voodoo and Human Trafficking in Nigeria: A Nation's Albatross' [2015](3) (2) Journal of Social Welfare and Human Rights 33-55..
- 11. E.W, Harrop, Ties that bind: African Witchcraft and Contemporary Slavery, Liberty and Humanity [2012] http://libertyandhumanity.com/themes/humantrafficking/ties-that-bind-african-witchcraft-and-contemporary-slavery/ [accessed 11 May 2022]

⁶⁰M.Mojeed.Voodo aids Human Trafficking <u>https://documentation.lastradainternational.org/lsidocs/Nigeria.pdf</u> accessed 22 May2022,

- 12. A.T Nwaaubani, 'A Voodoo curse on Human Traffickers'< https://www.nytimes.com/2018/03/24/opinion/sunday/voodoo-curse-humantraffickers.html>accessed [24 February 2022]
- 13. U.M Usman et al., 'Traficking Twin Error:Mysterious Madam and Voodoo Victimisation in the case of Nigeria' [2018] (8) (1) Journal of Public Administration and Governance, 403.
- 14. S.K,Kigbu, 'Challenges in investigating and prosecuting Trafficking in persons cases in Nigeria'[2015](38)*Journal of Law*,*Policy and Globalisation*,146-157.
- 15. Danish Immigration Service, Protection of Victims of Human Trafficking in Nigeria: Report from Danish Immigration Fact Finding Mission to Lagos. Benin City and Abuja Nigeria 9 - 26 September 2007. <u>https://www.ecoi.net/en/document/</u> <u>1280377.html>accessed</u> [19 May 2022]
- 16. UNHCR 'Voodoo, Witchcraft and Human Trafficking in Europe' New Issues in Refugee Research, Research Paper no. 263, October 2013.< <u>https://www.ecoi.net/en/file/local/1079285/1930_1382531731_526664234</u> pdf [accessed 24 March, 2022]
- M. Van der Watt and B.Kruger Exploring 'Juju' and Human trafficking: Towards a Demystified Perspective and Response' [2017] (48) South African Review of Sociology 70-86.
- United Nations Human Rights Office of the High Commissioner, *The Protection of Victims and Witnesses: A Compilation of Conference Reports and Consultations in Uganda* (2010) 83. <u>http://www.uganda.ohchr.org/Content/publications/Witness AndVictimProtectionInUganda.pdf</u> [accessed 19 May 2022]
- 19. O.Abe, and S.Ouma, 'A re-assessment of the impact and potency of traditional dispute resolution mechanisms in post-conflict Africa' [2017] 6 Ave Maria International Law Journal 11.
- 20. Finnish Immigration Service Country Information Human Trafficking of Nigerian Women to Europe <u>https://migri.fi/documents/5202425/5914056/60332</u> <u>Suuntaus_NigSuuntaus_HumanTraffickingfromNigeriaFINAL200415.pdf/8f310379-</u> 7101-447b826c-5d34a12ab8ab [accessed 24 March 2022]
- 21. S. O,Oyakhire Expanding The Scope Of 'Appropriate Measures': Do Traditional Institutions Play A Role In Facilitating The Protection Of Witnesses Of Trafficking *Journal of Comparative Law in Africa*[2019](6)(2) 80-103.