

**Juritrust Administration of Criminal Justice Academy Moot Competition, 2025/26
ACJAMC 105**

**IN THE FEDERAL HIGH COURT OF MAGARIA
IN THE MAGARIA JUDICIAL DIVISION
HOLDEN AT MAGARIA**

Charge No:

BETWEEN

Federal Republic of Magaria.....Complainant

AND

Aisha Ngozi Kemi..... Defendant

DEFENDANT’S FINAL WRITTEN ADDRESS

1.0. INTRODUCTION

This is the Defendant’s final legal submission, wherein the Defendant invites the Court to determine the charge brought against the Defendant under Sections 6 & 24 of the Cybercrimes Act (as amended in 2024) for unauthorized access and cyber stalking/extortion as well as to declare the *ex-parte* application brought under Section 9 of the Proceeds of Crime (Recovery and Management) Act 2022 for a Preservation Order on the Defendant’s apartment and the N200 Million found therein, on the grounds that they amount to “unexplained wealth” and likely “Proceeds of unlawful activity” as unconstitutional and unfounded.

2.0. BRIEF STATEMENT OF FACTS

The facts of this case are as follows:

2.1. Ms. Aisha Ngozi Kemi (Aisha) is a high-profile cyber security expert in the employ of AJOBOY systems – I.T. systems engineers and service providers to Rhapsody Bank (the bank).

2.2. In January 2025, the Defendant discovered a critical “backdoor” in the digital vault of the bank, which could allow anyone to alter the Social Security Number (SSN) linked to bank accounts.

2.3. Instead of immediately reporting to her employers Aisha:

1. Accessed the bank’s mainframe to demonstrate its vulnerability, accidentally downloading the Know Your Customer (KYC) data of 5,000 high-net-worth individuals.

2. Sent an anonymous email to the Bank CEO demanding a “consultancy fee” of N50 Million to disclose the location of the “backdoor” and delete the downloaded data.

2.4. The bank promptly alerted the Department of National Security and Aisha was arrested.

2.5. Investigators subsequently found in her apartment N200 Million in cash and three Bitcoin hardware wallets, despite her having no record of formal employment for three years.

2.6. The State has charged her under Section 6 & 24 of the Cybercrimes Act (as amended in 2024) for unauthorized access and Cyber stalking/extortion.

2.7. The State has also filed an ex parte application under Section 9 of the Proceeds of Crime (Recovery and Management) Act 2022 for a Preservation Order on her apartment and the N200 Million, on the grounds that they amounted to “unexplained wealth” and likely “proceeds of unlawful activity.”

3.0. LEGAL ISSUES FOR DETERMINATION

1. Whether *mens rea* is present where a professional in the course of her duty to troubleshoot shoot potential problems accidentally accessed and downloaded sensitive data like KYC data.
2. Whether the anonymous demand for a “consultancy fee” in exchange for disclosing a security flaw is established by mere fact that Aisha is living a lifestyle in excess of legitimate income and whether the demand even if traced to Aisha constitutes the offence of cyber stalking or extortion under section 24 of the amended Cybercrimes Act.
3. Whether a Preservation Order can be validly maintained over the Defendant’s assets under Section 9 of the Proceeds of Crime (Recovery and Management) Act on the basis of unexplained wealth before the underlying criminal charges of cybercrime have been proven.

4.0. LEGAL ARGUMENT

Issue One

4.1. Whether *mens rea* is present where a professional in the course of her duty to troubleshoot shoot potential problems accidentally accessed and downloaded sensitive data like KYC data.

4.1.1. To this issue, we humbly submit in the Negative.

4.1.2. **Section 6(1) of the Cybercrimes (Prohibition, Prevention, etc.) (Amendment) Act, 2024** provides;

- (1) Any person, who without authorization, intentionally accesses in whole or in part, a computer system or network for fraudulent purposes and obtain data that are vital to national security, commits an offence and shall be liable on conviction to imprisonment for a term of not more than 5 years or to a fine of not more than N5, 000,000.00 or to both fine and imprisonment.

The purport of this Section is to the effect that for there to be an offence under Section 6 of the Cybercrimes Act, there must be an unauthorized and intentional access.

4.1.3. The Court in **Julius v FRN**¹ in interpreting the provisions of **Section 6**² distilled the essential ingredients that must be satisfied in proving the commission of an offence under Section 6³, to wit:

- a) That the Defendant without authorization intentionally gained access wholly or in part to a computer system or network.
- b) That in gaining access to the computer or network as the case may be, the defendant obtained data to national security.
- c) That the data so obtained was for fraudulent purposes.

4.1.4. It is our humble but firm submission that the Prosecution has failed to satisfy all the three ingredients as distilled by the court.

Firstly, the access was authorized. Mrs. Aisha Ngozi Kemi is a high profile cyber security expert who works for Ajoboy system who in turn are I.T system engineers and service providers to Rhapsody Bank. by virtue of her office and the nature of her Job requires or gains access to Bank's database to carry out her professional duties such as vulnerability testing, troubleshooting and ethical hacking. This form part of the International best standard practices required in the field of cyber security.

4.1.5. The sole aim of Mrs. Aisha Ngozi was to run a vulnerability test on the Bank's database after discovering a critical backdoor which can affect the Bank very negatively

4.1.6. While the authorization was not expressly stated in the moot fact, it is certain that these practices are incidental to cyber security experts. Mrs. Aisha Ngozi Kemi only accessed the system after she discovered a vulnerability and in fulfilment duty as a cyber-security expert

¹ (2021) LCN/15094(CA)

² Cybercrimes (Prohibition, Prevention, etc.) (Amendment) Act, 2024

³ Ibid.

working for the Bank's Service Provider, she went ahead to demonstrate or test this vulnerability. This fully falls within the scope of her professional engagement.

4.1.7. In furtherance, In the case of **Omatseye V FRN**⁴ the court of appeal emphasized that in technical offences professional duties imply consent, unless it is revoked. Aisha's employment by AJOBOY systems contracted by RHAPSODY Bank's IT security, conferred implied authority on her, to probe vulnerabilities like the backdoor, as routine in cyber security protocols and In this instant case, there is no evidence that such authority was revoked.

4.1.8. Moving on, it cannot be said that a person acting in lawful capacity, and In the course of discharging her duties possessed the mens rea of downloading sensitive KYC data.

4.1.9. Secondly, there was no intention to obtain data not even for fraudulent purposes. The fact is very clear on this that in the course of demonstrating the system's vulnerability, Mrs. Aisha Ngozi Kemi "accidentally downloaded "the Know Your Customer (KYC) data of 5,000 high net worth individuals. This evidences the fact that the downloading of that was unintentional and not pre-planned but rather was as accident.

4.1.10. The law is trite that an offence to have been committed, the wrongful act must be accompanied by a guilty mind. This is encapsulated in the Criminal law principle of "**Actus non facit reum nisi men sit Rea**".

4.1.11. In furtherance **Section 24 of the Criminal Code** provides that;

Subject to the express provisions of this Code relating to negligent acts and omissions, a person is not criminally responsible for an act or omission which occurs independently of the exercise of his will, or for an event which occurs by accident.

⁴ (2017) LPELR-42719(CA)

We humbly refer my noble lords to the case of **Bello v. A.-G., Oyo State⁵** and **Mamman v State.⁶**

4.1.12. In similar vein, the gamut of Section 6 of the Cybercrimes Act which the Defendant was charged under revolves around intent which therefore means that without the presence of intention (guilty mind) an offence cannot be said to have been committed under Section 6 of the Cybercrimes Act.

4.1.13. The Court in **Nwokearu v State⁷** defined intention to mean “the purpose or design with which an act is formed. It is the foreknowledge of the act coupled with the desire to do the act. An act is intentional if and in so far as it exists in idea before it exists in the realm of facts, the idea realizing itself in the fact because of the desire it is accompanied.

4.1.14. Also my lords, the court in **Akilu v Fawehinmi⁸** held that “one cannot try a mere intention. An intention only becomes triable when it joins with the act”. This goes to show that the two (guilty mind and the act) must be present at the commission of an offence for an offence to be said to have been committed.

4.1.15. In this instant case, Mrs. Aisha Ngozi Kemi in the course of her professional engagement accidentally downloaded the KYC data of 5,000 high net worth individuals. The data having been accidentally downloaded negates the presence of intention and as such she cannot be held criminally liable for such accident.

4.1.16. It is on this ground that we therefore urge this Honourable Court to resolve this issue in favour of the Defendant.

⁵ (1986) 5 NWLR (pt. 45) 828

⁶ (2025) 1 NWLR (pt. 1973) 281

⁷ (2013) 16 NWLR (pt. 1380) 207

⁸ (1989) 2 NWLR (pt. 102) 122

Issue Two

4.2.0 Whether the anonymous demand for a “consultancy fee” in exchange for disclosing a security flaw is established by mere fact that Aisha is living a lifestyle in excess of legitimate Income and whether the demand even if traced to Aisha constitutes the offence of cyber stalking or extortion under section 24 of the amended Cybercrimes Act.

4.2.1. To this issue we humbly submit in the negative.

4.2.2. In addressing this issue, the Defendant will argue same from two stand point to wit:

1. Whether the anonymous demand for a “consultancy fee” in exchange for disclosing a security flaw is established by mere fact that Aisha is living in excess of legitimate income?
2. Whether the demand even if traced to Aisha constitutes the offence of Cyber stalking or Extortion under Section 24 of the amended Cybercrimes Act.”

Stand Point One

4.2.3. Whether the anonymous demand for a “consultancy fee” in exchange for disclosing a security flaw is established by mere fact that Aisha is living in excess of legitimate income?

To this issue, it is submitted in the negative to the effect that the anonymous demand for a “consultancy fee” in exchange for disclosing a security flaw is not established by the mere fact that Aisha is living in excess of her legitimate income.

4.2.4. Firstly, we submit that the mere fact that Aisha is living in excess of her legitimate income does not establish that the anonymous demand for a “consultancy fee” in exchange for

disclosing a security flaw. To state that this is the case means a presumption of fact to the effect that the establishment of a fact can lead to the establishment of another fact.

4.2.5. A presumption of fact is used to prove or establish other facts on the basis of other facts which have been proved. Presumption of facts was defined by the Court in the case of **Madagwa v. State**⁹ wherein the Court held that “an issue which is determined by a presumption is entirely a question of fact and a presumption of fact is the logical inference of the existence of other facts from the proved existence of other facts.”

4.2.6. In **Onuzulike v. C.S.D., Anambra State**¹⁰, it was also held that presumption is an assumption of fact resulting from a rule of law which requires such fact to be assumed from another fact or group of facts found or otherwise established in an action. **Ogbuanyinya & ors v. Okudo & ors.**¹¹

4.2.7. From the decisions of the Court, it can be gleaned that a presumption of fact can only be made on proven facts and in the instant case, it is submitted that the wealth of Aisha which was termed as an unexplained wealth is an assumption which have not been proven or established. The Prosecution has to establish that the wealth of Aisha is not commensurate to her legitimate income.

4.2.8. Where the Prosecution fails to establish that the wealth of Aisha is not commensurate to her legitimate income, it is our submission it cannot validly make a presumption of fact relying on this assumption. It is our submission that this will amount to making a presumption on an assumption, a speculation which would grossly mislead the Court.

⁹ (1988) 5 NWLR (Pt. 92) 60

¹⁰ (1992) 3 NWLR (Pt. 232) 791

¹¹ (1990) LPELR-2294(SC)

4.2.9. The issue that Aisha's "unexplained wealth" established that she made the anonymous demand for a "consultancy fee" in exchange for disclosing a security flaw constitutes a hard fact of law which must be established by evidence and not by assumption and this has no place in law. In the case of **ALIYU v. KANO STATE**¹², while the Court recognized that inference can be made in certain circumstances, it held that an inference is a reasonable deduction from proved facts whereas speculation is a mere variant of imaginative guess which, even when it appears plausible, should never be allowed by a Court of law to fill any hiatus in the evidence before it.¹³

4.2.10. In furtherance, the Defendant submits that Aisha cannot be said to have made the anonymous demand for a "consultancy fee" of N50 Million to disclose the location of the critical "backdoor" in the digital vault of the bank as well as delete the downloaded data. It is argued that the presence of a critical "backdoor" in the digital vault of the bank constitutes a vulnerability which renders it susceptible to being accessed by third parties (aside the cyber security experts in AJOBOY system). From the fact of this case, it was expressly stated that the critical "backdoor" was such which could allow anyone to alter the Social Security Number (SSN) linked to bank accounts.

4.2.11. The existence of such vulnerability and consequently, an unguided accessibility raises an issue of the identity of this anonymous user which could be any person other than Aisha or the cyber security experts in AJOBOY system. Therefore, linking Aisha to a message made by an anonymous user on the grounds that her wealth was termed unexplained would amount to the highest form of speculation and assumption.

¹² (2021) LPELR-54797(CA)

¹³ BAMGBOYE v. UNILORIN & ANOR (1999) LPELR-737(SC)

4.2.12. Thus, to link Aisha to a message whose sender is unknown and cannot be identified amounts to speculation and it has been plethora of cases that it has no place in the realm of law. In the case of **STAG ENGINEERING CO. LTD v. SABALCO (NIG) LTD & ANOR**¹⁴, the Court held that “a Court of law cannot decide issues on speculation no matter how close what it relies on may seem to be to the facts.”

4.2.13. The Defendant therefore submit that the anonymous demand for a “consultancy fee” in exchange for disclosing a security flaw is not established by the mere fact that Aisha is living a lifestyle in excess of legitimate income as this will amount to speculation which has no place in law.

Standpoint Two

4.2.14. Whether the demand even if traced to Aisha constitutes the offence of Cyber stalking or Extortion under Section 24 of the amended Cybercrimes (Prohibition and Prevention) Act. The Defendant submits that this demand does not constitute the offence of Cyber staking or extortion under Section 24.¹⁵

4.2.15. Assuming but not conceding that the anonymous demand was traced to Aisha, it must then be established that this demand constitute an offence of cyber extortion under section 24 of the amended Cybercrimes (Prohibition and Prevention) Act.

4.2.16. To determine whether the anonymous demand constitute the offence of cyber extortion, it becomes pertinent to reproduce section 24 (2) (c) of the Cybercrimes (Prohibition, Prevention, etc.) (Amendment) Act, 2024 which succinctly provides for the offence of cyber extortion.

¹⁴ (2008) LPELR-8485(CA)

¹⁵ Cybercrimes (Prohibition, Prevention, etc.) (Amendment) Act, 2024

Section 24 (2) (c)¹⁶ provides thus:

Any person who knowingly or intentionally transmits or causes the transmission of any communication through a computer system or network – containing any threat to harm the property or reputation of the addressee or of another or the reputation of the deceased person or any threat to accuse the addressee or any other person of crime, to extort from any person, firm, association, or corporation, any other money or other thing of value, commits an offence under this Act and is liable on conviction.

4.2.17. From the provision of Section 24 (2) (c)¹⁷, to ground the offence of cyber extortion, three elements must be present and must be concurrently established. These elements are to wit:

1. That the person knowingly or intentionally transmitted any communication
2. That the communication was made through a computer system
3. That the communication was for the purpose of extorting from any person, firm, association or corporation, any other money or thing of value.

4.2.18. The Defendant argues that these elements have not been concurrently established by the prosecution. The Prosecution has failed to establish that Aisha knowingly or intentionally transmitted any communication which forms the requisite mens rea for the offence of cyber extortion. Mens rea have been held to be a necessary element which must be established alongside the act of an offence (where the act has successfully been established). The position of the law on the requirement of mens rea has received judicial blessings in plethora of cases. In **Ugbogbo v. State**¹⁸, the Court held that there must surely be a proof of the intercourse between the actus reus and mens rea for the guilt of the defendant to be determined.

¹⁶ Ibid

¹⁷ Ibid

¹⁸ (2026) 4 NWLR (Pt. 2033) 23

4.2.19. Notwithstanding the foregoing, the law makes provision for circumstances when mens rea may not be proved which is with respect to offence of strict liability. It is our submission that the offence of cyber extortion does not fall within offences of strict liability and as such, mens rea must be successfully established by the prosecution.

4.2.20. On the second element which is that the communication was made through a computer system, it is our submission that this must be adequately established by the Prosecution as this constitute the actus reus of the offence of cyber extortion.

4.2.21. Assuming but not conceding that the anonymous demand was made by Aisha, it must succinctly be established that it was made via a computer system or network. This the Prosecution has failed to prove by providing the details of the computer system or network which was employed to transmit the email. Upon tracking the email, through its technical metadata it can be ascertained whether an email was made via a computer system or network. This is done by tracing the email (whether or not it is anonymous) back to its origin.

4.2.22. The Prosecution has to establish this element and failure to establish an element of an offence cannot amount to a proof of such offence or a conviction of same. In the case of **C.O.P. v. Ogor**¹⁹, the Court held that the Prosecution must prove every ingredient of the offence charged. Failure to prove an essential element of a crime is fatal as the burden to prove beyond reasonable doubt has not been discharged.

4.2.23. On the third element of the offence of cyber extortion, the Defendant argues that the Prosecution must prove that the communication was for the purpose of extorting from any person, firm, association or corporation, any other money or thing of value.

¹⁹ (2022) 14 NWLR (Pt. 1849) 49

4.2.24. The Defendant respectfully submits that assuming but not conceding that the anonymous demand was made by Aisha, such demand does not amount to an extortion and neither was it accompanied by any threat. We submit that the N50 Million demanded amounted to a consultancy fee for her expert services on cyber security provided to the bank for the detection of the critical “backdoor” in the digital vault of the bank.

4.2.25. It is further submitted that her grounds for the requirement of a consultancy fee is rooted in the fact that her employers AJOBOY systems – I.T. systems engineers and service providers were already under a contractual agreement with Rhapsody Bank. In this instant case, Aisha acted as an agent of her employer by requesting for their contractual payment for detecting the critical “backdoor” in the vault of the bank.

4.2.26. In furtherance, the argument of the Prosecution that the download of the Know Your Customer (KYC) data of 5,000 high-net-worth individuals demonstrates as well as establishes the offence of cyber extortion on Aisha’s part is greatly flawed and amounts to a gross misconception of the facts of this case.

4.2.27. From the fact of the case, Aisha’s download was done accidentally while trying to demonstrate the vulnerability and unguided access of the bank's mainframe. Thus, an act which was done accidentally without being premeditated amounts to an absence of intention and cannot establish the offence of cyber extortion by Aisha. In the case of **Wowem v. State**²⁰, the court held that an accident is an event that happens unexpectedly, one which was not planned in advance and as such negates intention to cause what happened.

Regarding her precondition to delete the accidentally downloaded Know Your Customer (KYC) data of 5,000 high-net-worth individuals, it is submitted that this is a mechanism for

²⁰ (2021) 9 NWLR (Pt. 1781) 295

enforcing the payment of the N50 Million by the bank to her employers and does not amount to a threat to cause harm or to utilize these data to the detriment of the bank.

4.2.28. Conclusively, the Defendant submits that the Prosecution has failed to concurrently establish the elements of the offence of cyber extortion in this case and as such cannot ground a conviction of same. The Court held in the case of **State v. Fafuru**²¹ that the Prosecution, in order to secure a conviction, must prove all the elements of the offence beyond reasonable doubt.²²

4.2.29. Relying on the argument canvassed herein, it is the Defendant's submission that the anonymous demand does not constitute an offense of cyber extortion contemplated by Section 24 of the Cybercrimes (Prohibition and Prevention) Act.

4.3.0 ISSUE THREE

4.3.1. Whether a Preservation Order can be validly maintained over the Defendant's assets under Section 9 of the Proceeds of Crime (Recovery and Management) Act on the basis of unexplained wealth before the underlying criminal charges of cybercrime have been proven.

4.3.2. To this issue, we humbly submit in the Negative.

4.3.3. Section 9 of the Proceeds of Crime Act, under which the prosecution made the application requires that before a Preservation Order is granted, there must be reasonable grounds to believe that the property in question constitutes proceeds of unlawful activity. However, such reasonable grounds must be based on credible evidence, not mere suspicion or conjecture. The Supreme Court, in **Calistus Obitude v. Onyesom Community Bank Ltd.**²³, held that allegations of fraud

²¹ (2023) 1 NWLR (Pt. 1866) 475

²² Igwe v. State (2024) 18 NWLR (Pt. 1971) 487

²³ (2014) JELR 40039 (SC)

or wrongdoing must be specifically pleaded and proved. Vague or general assertions are insufficient. This is why the Supreme Court in the case of **EFCC V ORONSAYE**²⁴ set aside a forfeiture for lacking reasonable grounds.

4.3.4. In the present case, the State has not adduced any evidence linking Ms. Aisha's assets to the alleged offences or any offence at all. The ₦200 Million and Bitcoin wallets were found in her apartment, but there is no evidence establishing that these funds were proceeds of the alleged cybercrimes or any offence at all. Ms. Aisha has had no formal employment for three years, but this does not automatically render her assets "unexplained wealth." She may have legitimate sources of income, such as savings, investments, consultancy fees from previous engagements, or inheritance, which the prosecution has not investigated.

4.3.5. The Constitution of the Federal Republic of Nigeria 1999 (as amended) guarantees every person the presumption of innocence until proven guilty. Section 36(5) of the Constitution provides that "every person who is charged with a criminal offence shall be presumed to be innocent until he is proved guilty." The application for a Preservation Order, premised on the assumption that Ms. Aisha's assets are proceeds of crime, in the absence of reasonable grounds and suspicion effectively reverses this constitutional presumption and treats her as guilty before trial.

4.3.6. In **Ebele Okoye v. Commissioner of Police**²⁵, the Supreme Court emphasized that constitutional rights, including the presumption of innocence, must be zealously protected. The Court held that an accused person is entitled to all facilities necessary for his defense, and any action that undermines his presumption of innocence is unconstitutional.

²⁴ (2020) 18 NWLR (PT.1750)

²⁵ (2015) JELR 55067 (SC)

4.3.7. The application for a Preservation is unfounded. The Prosecution having failed to distill reasonable grounds as to why the order should be granted.

4.3.8. Granting a Preservation Order in the absence of reasonable grounds presumes guilt and deprives Ms. Aisha of the use and enjoyment of her property without due process. In **L.T. Col. Mrs. R.A.F. Finnih v. J.O. Imade**²⁶, the Supreme Court held that legal rights cannot be extinguished or curtailed without adherence to due process and established legal procedures. The Preservation Order undermines Ms. Aisha's constitutional right to be presumed innocent and to the enjoyment of her property. **Section 44(1)**²⁷ guarantees the right to property and provides that no property shall be compulsorily acquired without due process.

4.3.9. Going further, the Defense submits that the Prosecution's failure to investigate and disprove lawful sources of Ms. Aisha's wealth renders the application for a Preservation Order baseless. The burden is upon the State to prove that the assets are proceeds of crime, not upon Ms. Aisha to prove lawful acquisition.

4.3.10. The State has not adduced credible evidence linking Ms. Aisha's assets to the alleged offences. The allegation of "unexplained wealth" is speculative and unsupported by investigation or proof.

4.3.11. The Defendant therefore submits that the application for a Preservation Order is misconceived and ought to be dismissed.

4.3.12. It is on this ground that we humbly urge this Honourable Court to resolve this issue in favour of the Defendant.

²⁶ (1992) 1 NWLR (Pt. 219) 511

²⁷ Constitution of the Federal Republic of Nigeria 1999 (as amended)

5.0. CONCLUSION

Relying on the legal arguments above as well as the judicial and statutory authorities, we respectfully pray my noble Lords to resolve all issues in favour of the Defendant, duly discharge and acquit the Defendant.

May my noble Lords be pleased.

Dated this 24th Day of March 2026.



Team 105

Counsel for the Defendant

For Service on:

Counsel for the Prosecution.

LIST OF AUTHORITIES

Judicial Authorities

1. Julius v FRN (2021) LCN/15094(CA)
2. Omatseye V FRN (2017) LPELR-42719(CA)
3. Bello v. A.-G., Oyo State (1986) 5 NWLR (pt. 45) 828
4. Mamman v State (2025) 1 NWLR (pt. 1973) 281
5. Nwokearu v State (2013) 16 NWLR (pt. 1380) 207
6. Akilu v Fawehinmi (1989) 2 NWLR (pt. 102) 122
7. Madagwa v. State (1988) 5 NWLR (Pt. 92) 60
8. Onuzulike v. C.S.D., Anambra State (1992) 3 NWLR (Pt. 232) 791
9. Ogbuanyinya & ors v. Okudo & ors (1990) LPELR-2294(SC)
10. Aliyu v. Kano State (2021) LPELR-54797(CA)
11. Bamgboye v. UNILORIN & Anor (1999) LPELR-737(SC)
12. Stag Engineering Co. Ltd v. SABALCO (NIG) LTD & ANOR (2008) LPELR-8485(CA)
13. Ugbogbo v. State (2026) 4 NWLR (Pt. 2033) 23
14. C.O.P. v. Ogor (2022) 14 NWLR (Pt. 1849) 49
15. Wowem v. State (2021) 9 NWLR (Pt. 1781) 295
16. State v. Fafuru (2023) 1 NWLR (Pt. 1866) 475
17. Igwe v. State (2024) 18 NWLR (Pt. 1971) 487
18. Calistus Obitude v. Onyesom Community Bank Ltd (2014) JELR 40039 (SC)
19. EFCC V Oronsaye (2020) 18 NWLR (PT.1750)
20. Ebele Okoye v. Commissioner of Police (2015) JELR 55067 (SC)
21. L.T. Col. Mrs. R.A.F. Finnih v. J.O. Imade (1992) 1 NWLR (Pt. 219) 511

Statutory Authorities

1. Cybercrimes (Prohibition, Prevention, etc.) (Amendment) Act, 2024
2. Constitution of the Federal Republic of Nigeria 1999 (as amended)
3. Proceeds of Crime (Recovery and Management) Act, 2022.