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Concept of Corruption in the Context of Administration of Criminal Justice in Nigeria: An Examination

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Abstract:

Corruption has been on the upsurge despite efforts by Nigerian Government to combat same. The Nigerian government had approached combating the menace by adopting several strategies such as the enactment of Corrupt Practices and Other Related offences Act, 2004, Economic and Financial Crime (establishment etc.) Act, 2004 as well as Code of Conduct Bureau and Tribunal Act, 2004. This paper examined corruption from the perspectives of nature, concept and definition of corruption as well as causes of corruption in Nigeria. The doctrinal method of research, which analytically examined corruption in the context of administration of criminal justice in Nigeria, was adopted and it was found that corrupt top government functionaries are hardly punished or condemned openly when in office. One major problem which Nigeria faces relates to bad leadership. The leaders govern with deceit, insincerity and double standard using their offices and status to cover up their misdeeds. It was found that corrupt top government functionaries are hardly punished or condemned openly when in office. One major problem which Nigeria faces relates to bad leadership. The leaders govern with deceit, insincerity and double standard using their offices and status to cover up their misdeeds. It was also found that the system of justice has been characterized with delay, too much adherence to legal technicalities, emphasis on the foreign notion of justice etc. In view of this, many accused persons who ought to have been sent to prison often go free. Here, a point of emphasis is that corruption will be on the increase. It is recommended that the governing laws on corruption in Nigeria should be delved to reflect the international policy on combating corruption.

Keywords: Administration, concept, context, corruption, criminal, justice, Nigeria

1. Introduction

Corruption is a worldwide phenomenon or series of phenomenon and therefore not surprising that it has spawned considerable scholarly works in recent times.¹ It is easy to state that corruption is perverse in Nigeria but "corruption" as a concept is not defined in the Constitution of Nigeria or comprehensively defined by the various statutory provisions dealing with different facets of the phenomenon²

The necessity to conceptualize and fight corruption is a fundamental constitutional imperative is judicially manifested in Nigerian courts³

2. Nature of Corruption

The nature of corruption is of an unauthorized and clandestine conduct that can only be identified in terms of its ingredients, scope and character⁴

Corruption may be in the form of any discussion, act or conduct that subvert the integrity of people in authority or institution charged with defending or sustaining the democratization process, thereby undermining its effectiveness in performing its assignment⁵

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¹ Odekunle, F "Fighting corruption and organised crimes in Nigeria: Challenges for the New Millenium" in Nigeria Corruption in Development. (ed) Odekunle F. (Ibadan University Press, Ibadan- Nigeri 1986] p.

² Goodling N A "Nigerian Crisis of Corruption: Can the U.N Global Program Hope to Resolve this Dilemma". Vanderbilt Journal of Transnational law [2003] Vol. 36 [997]- [1026]

³ see Attorney General of Ondo State v. Attorney- General of The Federation and Others (2002) 9 NWLR (772) 222 and Chief Adebisi Olafisoye v Federal Republic of Nigeria(2004) 4 NWLR (pt.864) 580

⁴ Adeyemi A A "Corruption in Nigeria" in Kalu and Osinbanjo [eds] Perspectives on corruption and economic crimes in Nigeria. (Federal Ministry of Justice, Abuja- Nigeria 1991]

⁵ Gboyega A Corruption and Democratisation in Nigeria[1983- 1993]: An Overview.[Agro – Areo publishers, Ibadan- Nigeria 1996] 6

Numerous attempts have been made to define and conceptualize corruption. Defining corruption manifest that corruption is both emotive and enigmatic because it is malleable, hydra-headed and a general phenomenon or perhaps collection of phenomenon which are related in various ways that there is no single clinical definition which encapsulate corruption.⁶

The confusion in the definition of corruption on can be seen in various legislation that criminalize corruption in Nigeria and the diversity of approach of international treaty to the problem. A common definition of corruption or unanimity of approach for dealing with corruption does not currently exist among countries but there appear to be a consensus that "corruption" is evil

3. Concept of Corruption

Corruption has been variously discussed in Literature. Robinson⁷ simply referred to it as the abuse of public roles of resources for private benefit. The defect here is the limitation to abuse in the public function while corruption is perpetuated also in the private functions.

Odekunle discussed and described corruption from diverse perspectives as: A specie of a more individual class of criminal or socially injurious conduct or behavior, coded and un coded: the corruption is perpetuated primarily for economic gain and it involves a use or misuse of legitimate form of commerce, industry, trade, government or corporate service and administration as well as some forms of organization in the sense of a set of systems of more or less formal relationship between the parties perpetrating the corrupt acts.⁸

Corruption is also described as "the gain of money; material financial resources, contract employment status, name, power or physiological or psychological satisfaction through illegal and or immoral practices such as bribery, fraud, abuse of office; the most prevailing and a catalyst to all other crimes may be understood by reference to the quality of an act or behavior rather than the act itself⁹ An instance of this is where an official who is entrusted with responsibility for awarding contracts may do so corruptly by asking and accepting gratifications in the course of carrying out the responsibility. The corrupt act is not the mere act of awarding the contract but the manner in which it is done.¹⁰

From the above discourse it can be said that the common feature of corruption is that it is born out of greed; an impairment of integrity, virtue or moral principle, depravity, decay, decomposition, inducement to wrong by improper or unlawful means, a departure from the original or from what is pure or correct and committed in the course of public, business, private and social dealings.¹¹

Any wrong doing or departure from the proper course of conduct may be termed as corrupt. In *Biobaku v Police*¹² Bairamian J, held "corruptly" means improperly and "impropriety" means the receiving or offering of some benefits as a reward or inducement to sway or deflect the receipt from the honest and the impartial discharge of his duties.

The above decision seems to cover situation of giving, offering or receiving gratification or bribe or some other forms of benefit such as sexual favour, admission into societies, confinement of chieftaincy titles etc. but will not cover instances of criminal justice where official decides to show favour on the basis of family, township, professional or other such relationship without any form of benefit or gratification being involved.¹³

Adeyemi described corruption as an act done with the intent to give some advantages inconsistent with official duty and rights of others; the act of an official or fiduciary person who unlawfully or wrongfully uses his station or character to procure some benefits for himself or for another person contrary to duty and rights of others will be corruption; the receiving or offering of money or other gratifications in order to deflect a person from honest discharge of his duties or the demanding of money or other gratification in order to perform a personal duty.¹⁴

From the generality of the discussions on corruption there is no single comprehensive and universally acceptable definition of corruption as a concept¹⁵ because the concept itself vary in context, application and location but the essence of corruption is the accruing gain which may be direct or indirect and constitute harm to society and inadvertently illegal¹⁶. In other words, corrupt practices include receipt of money by public servants or people in certain positions in order to get certain change done, or bribes given to high level public servants, political office holders or even judges with the intention of influencing a course of action or changing decision.

⁶ United Nations Guide for Anti-corruption Policies, November, 2003 21. Available at <http://www.undoc.org/corruption.html>

⁷ Robinson M "Corruption and Development": An Introduction to European Journal of Development Research, (1998) Vol. 10 p. 3

⁸ Odekunle F "Controlling Indiscipline and Corruption in Nigeria: Fundamental and Short-term measure" in Awa K. and Osinbanjo Y (eds): Perspectives on Corruption and other Economic Crimes [Federal Ministry of Justice-Abuja-Nigeria 1991] 13.

⁹ Olusegun Management of Corruption [Literamed Publication Limited. Ibadan Nigeria 1981] 17

¹⁰ Adeyemi A.A., "Corruption in Nigeria: The Criminological Perspectives" Awa Kalu and Yemi Osinbanjo (Eds) op. cit 1

¹¹ Awah A Laws' Response to Corruption: in Ayua and Guobodia (Eds) [Nigeria Institute of Advanced Legal Studies, Lagos Nigeria, 2001] 656

¹² (1951) 20 NLR 30

¹³ Adeyemi A A 'The Impact of Corruption on the Administration of Justice in Nigeria' in Ayua I A and Guobodia D A (eds) Political Reforms and Economic Recovering in Nigeria [Nigeria Institute of Advanced Legal Studies Lagos Nigeria 2001] 678.

¹⁴ Ibid

¹⁵ Shehu, A Y Economic and Financial Crimes in Nigeria : Policy Issues and Options (National Open University of Nigeria, 2006) [75] -[76]

¹⁶ Lame, I Y " An Overview of Economic Crimes" paper presented at the First National Seminar on Economic Crimes. Abuja – Nigeria August , 27 2001 pp. 13-

14

In short, the promise offers or receipt of cash shares, gifts and other favour that influence action or decisions of an individual.¹⁷ Behavior which deviates from the normal duties of a public role because of private matter such as family ties pecuniary gains or violates rules against the exercise of certain types of private influence also constitute corruption. In view of the difficulty in defining corruption, one of the options considered during the elaboration of the United Nation Convention against Corruption (UNCAC)¹⁸ was not to define corruption per se but to identify and describe the specific conducts that are generally classified as corrupt criminal misconduct. Such misconduct includes bribery, embezzlement, theft, fraud, abuse of discretion, favoritism, utilization of official position or title for personal or private gains, either on an individual or collective basis at the expense of the public good in violation of established rules and ethical consideration and through the direct or indirect participation of one or more public officials whether they be politician or bureaucrats.¹⁹

The United Nations Office on Drugs and Crimes commented on the difficulty of proffering a universally acceptable definition of corruption observed as follows: Attempts to define or classify corruption for various purposes have been based on many different perspectives and criteria including moral criteria, description of the conduct or behavior involved; modes involving conflict of interest; breaches of trust or abuse of principal agent/ client relationship, economic, political and administrative models; destination based on whether the corruption involved public or private sector actor or interest; and on factors such as such as whether the actors are engaged in organized crimes or more ad hoc forms of corruption. Corruption may involve cash or economic benefits, power or influence or even less-tangible interest, and occurs in both government and the private sectors, in free market and closed economics and in democratic and non- democratic government and societies²⁰

The best quoted and most acclaimed definition of corruption among western scholar's states that Corruption is behavior which deviates from the formal duties of a public role because of private regarding (personal, close family, private clique) pecuniary or status gains; or violates rules against the exercise of certain types of private-regarding influence. This include such behavior as bribery (use of reward to pervert the judgment of a person in a position of trust); nepotism [bestowal of patronage by reason of relationship rather than merit]; and misappropriation of public resources for private- regarding uses] ²¹

The above definition suggests that corruption is immoral, a breach of duty and a betrayal of trust. The concept of corruption suggests that there are certain normative values cherished by members of any society and which legitimize the established institutions of that society. Corruption violates these normative values and thus offends the society's moral sensibilities²²Corruption takes different forms and manifestation ranging from bribery to influence peddling, embezzlement, white elephant projects and other forms of abuse of powers for personal or narrow group gain.²³

4. Definition of Corruption

The word 'corruption' is to be treated as a legal term of arts and reliance will be placed on law Dictionary meaning of the term and the meaning assigned to it from the relevant statutory provision. The Black's Law Dictionary defines corruption to mean:

The act of doing something with an intent to give some advantage inconsistent with official duty and the right of others, a fiduciary's or official's use of a station or office to procure some benefits either personally or for someone else contrary to the rights of others. It includes depravity, pervasion or taint, an impairment of integrity, virtue or moral principles especially impairment of public official's duties by bribery.²⁴

It is observed that the above dictionary meaning of corruption emphasizes the essence of corruption in its legal sense which is the inducement to show favour itself rather than the showing of favour itself. It also demonstrates the use of the word corruption to cover arts other than where it is popularly termed bribery²⁵

The Anti-Corruption Act²⁶ defines corruption to include bribery, fraud and other related offences. This definition has been observed to be vague²⁷ though the Act created and defined acts of corruption to include gratification which encompass all known shapes of corrupt practices.

The Corrupt Practices and Other Related Offences Act²⁸ has suggested that six forms of conducts could be responsible for the widespread corruption amongst civil servants. These conducts are use of one's office for pecuniary advantage,

¹⁷ Ibid 14

¹⁸ The United Nation Convention Against Corruption, Vienna (2004)

¹⁹ Hope R K Corruption and Development in Africa: Lessons from Countries Case Studies (Macmillan Press Ltd. London. 2001) 18

²⁰ Esa Onoja and Shankyula T S "The Prospect of Congruence in the Definition of Corruption: Nigerian Perspectives" NIALS Journals of Laws and Development, Nigerian Institute of Advanced Legal Studies, Lagos- Nigeria p. 114

²¹ Nye J S Corruption and political Development: A Cost- Benefit Analysis American Political Science Reveiw 1967 vol.61 p 417 @ 419 quoted by Henning P J Public Corruption: A Comparative Analysis of International Corruption Convention and United States Law Arozon Journal of International and Comparative Law 2001 vol. 18 pp.793- 865 @ 802

²² Anikpo , M 'Reflection on the Nature of Corruption' in Odekunle E[ed] Nigeria:Corruption in Development. op.cit 61

²³ Odekunle F " Illustrations of Types, Patterns and Avenues of Corruption in Nigeria: A typology" in Awa K. and Osibanjo,Y. {eds} Perspectives on Corruption and other Economic Crimes in Nigeria Federal Ministry of Justice,Lagos, Nigeria, Law Review Series (1999) Vol. 2. [92]-[99].

²⁴ Bryan ,A.G. Black's Law Dictionary, (West Group Publishing Co. USA 8th Edition 1999) 371

²⁵ Nicolas, Collins: Corruption and Misuse of Public Office (Oxford University Press, New York 2006) 2

²⁶ S. 2 Corrupt Practices and other Related Offices Act, Cap C. 31 Laws of the Federation of Nigeria, 2004.

²⁷ Akanbi M. "The Fight Against Corruption in Governance" In: Ladan M.T. (ed) Law, Human Right and the Administration of Justice in Nigeria op. cit 38

²⁸ Corrupt Practices and other Related Offices Act, Cap C. 31 Laws of the Federation of Nigeria, 2004. Ibid

gratification, influence peddling, insincerity in advice with the aim of gaining advantage, less than a full day's work for a full-day's pay, tardiness and slovenliness²⁹.

The term "Gratification" is defined by the Corrupt Practices Commission Act to mean;

- Money donation, gift, loan, fee, reward valuable security property or interest in property, being property of any description whether movable or immovable, or any other similar advantage given or promised to any person with intent to influence such a person in the performance or non-performance of his duties.
- Any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
- Any valuable consideration of any kind, any discount, commission, rebate, deduction percentage;
- Any forbearance to demand any money or money's worth or valuable thing;
- Any other service or favour of any description, such as protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted and including the exercise or the forbearance from the exercise of any rights or official power or duty; and
- Any offer, undertaking or promise, whether conditional or unconditional of any gratification within the meaning of any proceeding³⁰

The above interpretation of the word 'gratification' in the Act no doubt is made in an elaborate form. It seeks to encompass all known shades of corrupt practices. The Penal Code Law³¹ utilized the same word 'gratification' to define, prohibit and punish acts of corruption through 'taking' or 'offering' of gratification by or to public servant in respect of his official duties.

Section 115 Penal Code made it an offence of corruption the taking of any gratification whatever whether pecuniary or otherwise by a public servant in respect of his or her official act. Section 118 Penal Code also prohibits offering or giving any gratification whatever pecuniary or otherwise by public servants in the discharge of their official responsibilities.

Therefore, the element of 'gratification' might be 'pecuniary' or otherwise. Hence money, contract, rendering services, etc., could be species of prohibited gratification as defined under the Penal Code and as elaborated under Corrupt Practices and Other Related Offences Act.

The Penal Code makes 'motive' or 'reward' as an element of gratification and to satisfy the requirement of motive or reward in gratification there must be proof of an understanding that the bribe was given or taken by a civil servant in relation to some official act or conduct. It is not necessary to show that the official act, the subject of the consideration was performed by the public servant and it is not a defence to show the act was a legal one and against the person who gave the bribe. It is also not necessary to show that at the time of taking a bribe a public servant intended to perform the act³². In essence, where an allegation is against an accused for the doing or forbearing to do any act, it must be in the exercise of the actual function of his office.

The "official act" used in the section presuppose that the act in consideration of which the bribe was tendered must be shown to be an act connected with the official functions of the offender or accused³³.

5. Causes of Corruption in Nigeria

The tremendous increase in cases of corruption and corrupt practices in Nigeria is associated with inadequacy in anti-corruption laws, influence of environment, poor economy, poor administration of justice, poor leadership and influence of enactment of laws³⁴

5.1. Environment Cause

Environment has been identified as one of the causes of corruption because societies have the criminals they deserve. Frequent commission of crimes reflects on what a society/community is. Hence, Professor Sutherland³⁵ remarked: The real function of crime is to act as a notification of maladjustment. Just as pain is a notification to the organism that something is wrong, so crime is a notification of social maladjustment, especially when crime becomes prevalent.

5.2. Extended Family Relationship

The concept of extended family relationship in Nigeria is also an environmental cause of corruption because in an attempt to satisfy needs the legal income cannot sustain there is the prone to look somewhere else to satisfy such needs. In view of the foregoing, it is now a convention to look at appointment into certain key posts in the public service as a way of making money to satisfy the extended family relations, friends, relatives etc.

²⁹ Oji S I "Overview of the Legal and regulatory Framework for Combating Corruption and Financial Crimes in Nigeria", Paper Presented at the Seminar Series, Faculty of Law, Usmanu Danfodiyo University, Sokoto-Nigeria [2011] 3

³⁰ S. 2 (a-g) Corrupt Practices and other Related Office Act, Cap C. 31 Laws of the Federation of Nigeria, 2004

³¹ Richardson, S S Notes on Penal Code (Gaskiya Corporation Zaria -Nigeria, 1987 (7th Edition)

³² Richardson, S S Notes on Penal Code (Gaskiya Corporation Zaria -Nigeria, 1987 (7th Edition) p.

³³ Richardson, S S Notes on Penal Code (Gaskiya Corporation Zaria -Nigeria, 1987 (7th Edition) P 73

³⁴ Adeyemi A A "Economic Crimes in a Development Society". Paper delivered at the first Conference of Attorney- General, Abuja- Nigeria. October 11- 13 1980

27

³⁵ Sutherland, E H Principles of Criminology in Philadelphia (1938) cited in Usmanu Danfodiyo University, Sokoto- Nigeria Law Journal(2001) vol 1 no 3

To buttress this fact, Samuel Cooley's Political Bureau Report observes: There is no doubt that in their general everyday behaviours, many Nigerians display a considerable indiscipline, impatience, wanton disregard of rules and regulations and widespread social ills. Dependency is no longer an act for which people feel ashamed. Contracts, intermediary roles in business and other such parasitic endeavors have become a quick means to money making.³⁶

Corruption thrives and accepted in Nigeria as a way of life depending on the chances and opportunities. Every person wants to make money at all cost as accumulation of money has been a basic criterion to which a person's success in life is being measured in Nigeria. For example, a person whose source of wealth is questionable is often conferred with chieftaincy title, meritorious awards etc. because of monetary donation in public gatherings notwithstanding the legality or otherwise of the sources of the wealth. The old moral standards are often no more reckon with. Hence, probity, accountability, honesty, integrity etc. are thrown into the dustbin. The danger of this development is that youths grow up to imbibe these conventions and practices as acceptable forms, values, and way of behavior in the society. Hence, the quest to commit immoral acts as to get quick money becomes the order of the day.

5.3. Economic Recession

The recession in the economy has adversely affected the labour market leading to massive retrenchment at both the private and public sectors of the economy. The few Nigerian workers who find themselves sustained in the labour market are complaining of poor condition of service His income cannot cope with certain basic necessities of life such as food, shelter, medication etc. He has to make adjustments to supplement the little income saved for his retirement period.

5.4. Adverse Effect of Colonization

One vital legacy of colonialism is neo-colonialism which effectively introduced money economy, foreign shares, and ideas into Nigerian economy whereby Nigeria operates a capitalist economy and creating an atmosphere of a desire for material wealth at all cost. *This situation has been described by Awa Kalu and Yemi Osinbajo* ³⁷ as: Having created the desires, aspirations and expectations for wealth, property, power and prestige in everybody, it fails because it is inherently unable to guarantee or ensure the equitable distribution of the means and opportunities to meet the created desires, aspirations and expectations as well as provide effective checks and balances and therefore minimize, if not avoid, the "corrupting privileges" of the rich and the "corrupting depravers" of the poor and the crime problem that is largely a function of both. Because there are no checks and balances to effectively limit the "freedom" to be wealthy and the freedom to be poor, both the beneficiaries and victims of the system are (alienated) "forced" as it were, to contribute their quota, in differently opportune ways to the crime problem. And herein lies the crime of the capitalist system.

The above observation as to the causes of corruption has also been confirmed by one of the reports of the United Nations Organization, where it asserts:

In most cases they are rooted in intimately interlocked social, economic and political conditions that facilitate such crimes of corruption...one facilitating condition is the cultural emphasis on material success and power as sources of status within a society...³⁸

5.5. Poor Administration of Justice

Another cause of corruption is associated with poor administration of justice. The relevant laws regulating crime and its control can be found under the Constitution, Criminal Code and the Penal Code. In addition, under the past military regimes, Decrees and Edicts had been passed into laws to supplement the Constitution and the Codes. Under these laws culprits are brought before law courts with a view to punishing them for offences committed. In addition, Commission of Inquiries and Tribunals are often set up to supplement the roles and functions of the conventional courts.

However, one noticed with disgust a tremendous increase in the way and manner corruption and corrupt practices have occurred in our societies. Our system of justice has been characterized with delay, too much adherence to legal technicalities, emphasis on the foreign notion of justice etc. In view of this, many accused persons who ought to have been sent to prison often go free. Here, a point of emphasis is that corruption will be on the increase.

The basic aim of any penal policy is to punish offenders. Yet, it is a common knowledge that punishments for many offences in Nigeria have lost their deterrent value. The reasons inferred from this anomaly include the non-commensurate punishment with offence and the slim chance of being caught and/or prosecuted etc. Coupled with the above, law enforcement agents have often circumvented laws in favour of a wealthy man to the detriment of indigent persons.

The end result is that, though, the former class do not enjoy formal immunity, they can break the law with impunity as elite offenders are able to influence, bribe or pressurize the personnel of the higher echelons of the enforcement agencies who, in any case, belong to the same class and share similar vested interest with the offenders. They are also able to engage the costly service of elite defence lawyers to exploit the errors, contradictions, obscurities, vagueness and loopholes in the pertinent legal provisions

In support of the above comments, the United Nations Organization noted that:

³⁶ See Report of Political Bureau 1987 {12.041}

³⁷ Awa U Kalu and Yemi Osinbajo *op cit*

³⁸ *ibid*

The selective operation of law enforcement and criminal justice, instruments of the power structure, allows some literally to get away with murder while ordinary offenders often pay a disproportionate price...calls for "law and order" (e.g. against armed robbery) are too often made by tainted politicians against petty street criminals, a matter which cannot but breed cynicism and erode confidence in a criminal justice system in which doubt i.e. standard obviously prevails.³⁹

Against this background, it is therefore not surprising that corrupt top government functionaries are hardly punished or condemned openly when in office. One major problem which Nigeria faces relates to bad leadership. The leaders govern with deceit, insincerity and double standard using their offices and status to cover up their misdeeds.

In view of the foregoing, most panels of inquiries and judicial tribunals are often set up to witch-hunt and to settle scores amongst rivalries. Hence, these panels are restricted to certain key sectors of the economy, dates and years with a view to cover some culprits or perhaps, to witch-hunt others.

Unfavourable recommendations could be jettisoned by the government and where they are approved, for lack of continuity in government policies, successive governments may reject those recommendations. In this regard, most of the politicians that were found guilty by panels instituted during the second republic had since gained their freedom, and the seized assets that were confiscated to the government had since been returned to their respective owners.

By a simple definition, these public officers are servants of the public but they behave in the contrary and as if Nigerian leaders are above the law. Hence, they choose which court's orders and judgments to obey. For example, in *Governor of Lagos State v Odumegu Ojukwu*⁴⁰ In reaction to the government's attitude, Obaseki, J.S.C. remarked:

In the area where rule of law operates, the rule of self-help by force is abandoned... Again, it will be doing injustice to the course of rule of law if I grant this application and allow this eviction of the respondent to stand....

6. Conclusion

Numerous attempts have been made to define and conceptualize corruption. Defining corruption manifest that corruption is both emotive and enigmatic because it is malleable, hydra-headed and a general phenomenon or perhaps collection of phenomenon which are related in various ways that there is no single clinical definition which encapsulate corruption. Corruption may mean act of doing something with an intent to give some advantage inconsistent with official duty and the right of others. In Nigeria, corruption and corrupt practices is associated with inadequacy in anti-corruption laws, influence of environment, poor economy, poor administration of justice, poor leadership and influence of enactment of laws. It was found that corrupt top government functionaries are hardly punished or condemned openly when in office. One major problem which Nigeria faces relates to bad leadership. The leaders govern with deceit, insincerity and double standard using their offices and status to cover up their misdeeds.

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³⁹ ibid

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