



Vol. 1, Pp. 1-7; May 2024

The Impact of Retracted Confessional Statements in Criminal Trials in Nigeria: An Analytical Study

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ABSTRACT

ARTICLE INFO

Received Date: 3 March 2024

Date Revised Received: 29 April 2024

Accepted Date: 3 May 2024

Published Date: 20 May 2024

Citation: Lugard, A. E. & Abdulsalami, T. L. (2024). The Impact of Retracted Confessional Statements in Criminal Trials in Nigeria: An Analytical Study. OMANARP INTER. J. LAW. Vol.1, Pp. 1-7, May 2024.

The admissibility and weight of confessional statements in criminal trials have been a contentious issue in Nigeria's legal landscape. This paper examines the effect of retracted confessional statements in Nigerian criminal trials, focusing on the legal principles, judicial precedents, and implications for justice. Through a comprehensive review of statutory provisions, case law, and scholarly literature, this study delves into the procedural and substantive considerations surrounding the admission and subsequent retraction of confessions. Drawing on both doctrinal and empirical analysis, the paper elucidates the factors influencing the admissibility of confessional statements, including voluntariness, legality of interrogation methods, and the right to legal counsel. It evaluates the divergent approaches adopted by Nigerian courts in assessing the reliability and credibility of retracted confessions, highlighting inconsistencies and lacunae in the jurisprudence. Furthermore, this study explores the psychological, social, and institutional factors that contribute to the phenomenon of confession retractions, shedding light on the vulnerabilities of suspects within Nigeria's criminal justice system. It examines the role of coercion, duress, and inducements in obtaining confessions, as well as the implications of false confessions on wrongful convictions and the integrity of the legal process. In conclusion, the paper offers recommendations for legal reforms, procedural safeguards, and judicial guidelines aimed at enhancing the fairness, transparency, and reliability of criminal trials involving confessional evidence in Nigeria. By addressing the complexities inherent in the treatment of retracted confessions, this study seeks to contribute to the ongoing discourse on the intersection of law, psychology, and justice in the Nigerian context.

Keywords: Retracted confessional, doctrinal, empirical analysis, confessional statements

INTRODUCTION

Confessional statements serve as critical pieces of evidence in criminal trials, often shaping the outcome of proceedings. However, the admissibility and reliability of such confessions, especially when retracted, pose significant challenges to the administration of justice. In Nigeria, the treatment of retracted confessional statements in criminal trials raises complex legal,

procedural, and ethical questions. This paper aims to explore the multifaceted implications of retracted confessions within the Nigerian criminal justice system, examining the legal framework, judicial approaches, and socio-legal dynamics surrounding this issue.

Objectives

1. To analyze the legal principles governing the admissibility and weight of confessional statements in Nigerian criminal trials.
2. To assess the impact of confession retractions on the fairness and integrity of the criminal justice process in Nigeria.
3. To examine judicial precedents and case law pertaining to the treatment of retracted confessions in Nigerian courts.
4. To identify the factors contributing to the phenomenon of confession retractions and their implications for the reliability of evidence.
5. To propose recommendations for legal reforms, procedural safeguards, and judicial guidelines aimed at addressing challenges associated with retracted confessions in Nigerian criminal trials.

Literature Review

Confessional statements play a pivotal role in criminal investigations and trials, often serving as decisive evidence of guilt or innocence. However, concerns regarding the voluntariness, reliability, and admissibility of confessions, particularly those that are retracted, have garnered significant attention in legal scholarship worldwide.

In the Nigerian context, the legal framework governing the admissibility of confessional statements is primarily delineated in the Evidence Act, Criminal Procedure Act, and relevant case law. The admissibility of confessions hinges on their voluntariness, obtained without coercion, inducement, or duress. However, the interpretation and application of these legal principles vary among Nigerian courts, leading to inconsistencies and judicial uncertainty. Case law provides valuable insights into the judicial treatment of retracted confessions in Nigeria. Notable cases such as *R v. Nsofor (1968)* and *State v. Idiong (2001)* have shaped the jurisprudence surrounding confession retractions, emphasizing the need for caution and scrutiny in assessing the reliability of such evidence. These cases highlight the importance of procedural safeguards, including the presence of legal counsel and the recording of interrogations, in safeguarding suspects' rights and ensuring the integrity of confessional evidence.

Moreover, scholarly literature delves into the psychological, social, and institutional factors influencing confession retractions in Nigeria. Issues such as police misconduct, coercive interrogation techniques, and the vulnerability of suspects, particularly marginalized groups, underscore the need for systemic reforms and safeguards to prevent wrongful convictions and miscarriages of justice. A confession is an admission made at any time by a person charged with a crime,

stating or suggesting the inference that he committed that crime, In Nigeria, as the case in point, confessions are covered by section 27 to 32 of the Evidence Act 1990.

Confessional statements play a significant role in criminal trials worldwide, including Nigeria. However, the admissibility and reliability of retracted confessions pose complex challenges within the Nigerian legal system. This literature review examines scholarly works and legal precedents to elucidate the effects of retracted confessional statements on criminal trials in Nigeria.

Coercion and Duress

Research by Alemika and Chukwuma (2012) highlights the pervasive use of coercion and duress by law enforcement agencies in Nigeria to extract confessions. They note instances where suspects, often under pressure, provide confessions that they later retract. The case of *State v. Musa (2017)* exemplifies this issue, where the defendant alleged torture leading to his retracted confession (Odinkalu, 2019).

Inadequate Legal Representation

Inadequate legal representation contributes to the vulnerability of defendants during interrogation. Oluwaniyi and Adelakun (2018) emphasize the importance of competent legal counsel in safeguarding defendants' rights. In *State v. Ibrahim (2019)*, the defendant retracted his confession after consulting with legal counsel, suggesting a lack of understanding of his rights during the initial interrogation.

Reliability and Voluntariness

The reliability and voluntariness of confessions are crucial for their admissibility. Akpotor and Obekpa (2015) argue that confessions obtained under duress or coercion lack reliability. *State v. Okonkwo (2016)* exemplifies this, where the defendant retracted his confession, alleging coercion by law enforcement officers.

Burden of Proof

Retracted confessions complicate the burden of proof for both prosecution and defense. Ajibola (2017) discusses how the prosecution struggles to establish the voluntariness and reliability of confessions after retractions. In *State v. Mohammed (2020)*, the prosecution faced challenges meeting the burden of proof beyond a reasonable doubt after the defendant retracted his confession.

Judicial Scrutiny and Fair Trial Rights

Judicial scrutiny is essential to ensure compliance with fair trial rights. Oguntolu and Adebayo (2019) stress the judiciary's role in safeguarding defendants' rights during

criminal proceedings. *State v. Ojo (2018)* exemplifies this, where the court excluded a retracted confession due to procedural irregularities and coercion during interrogation.

Public Confidence and Perception of Justice

The reliance on retracted confessions can erode public confidence in the justice system.

Odekunle (2016) discusses how public perception of fairness is crucial for maintaining trust in the legal system. *State v. Yusuf (2015)*, with its retracted confession and allegations of police misconduct, exemplifies cases that undermine public confidence in justice.

Retracted confessional statements in Nigerian criminal trials present multifaceted challenges, including coercion, inadequate legal representation, and implications for fair trial rights. Addressing these issues requires reforms to enhance legal protections, ensure the voluntariness of confessions, and bolster public confidence in the justice system.

In synthesizing existing literature and case law, this paper aims to provide a comprehensive understanding of the effect of retracted confessional statements in Nigerian criminal trials, elucidating the challenges, complexities, and potential reforms in this critical aspect of the criminal justice system.

The Effect of Retracted Confessional Statement in Criminal Trials in Nigeria

As we have seen, confessional statement if freely and voluntarily made is admissible against the maker. However, there are situations where an accused person who had previously made free and voluntary statement resides from it during trial. According to Gerald Nwagbogu (1994) "Where an accused in his evidence retracts his previous confessional statement, thus, rendering his earlier confession inconsistent and in conflict with his testimony, the confession, of shown by the prosecution to be voluntarily made, is admissible irrespective of its belated retraction" It is a settled principle of law that the fact that an accused person denies making a confession does not render it inadmissible.

The case of **Rex .v. Itule** is instructive in this respect. In that case, soon after the appellant was arrested for murder, he made a statement to the police in which he admitted killing the deceased, but described circumstances, which, if true, would amount to legal provocation. The next day he denied having made the statement and made a new one in which he repudiated all responsibility for the deceased's death. His evidence at the trial was substantially in uniformity with his second statement.

Brett Ag. C.J.F said: "A confession does not become inadmissible merely because the accused

person denied having made it and in this respect a confession contained in a statement made to the police by a person under arrest is not be treated differently from any other confession. The fact that the appellant took the earlier opportunity to deny having made the statement may lend weight to its denial but it is not itself a reason for ignoring the statement".

It is desirable to have outside the retracted confessional statement some evidence, which would make it probable that the confession was true.

The effect of a denial of a confessional statement was clearly made by the Supreme Court in **Ikpasa .v. State** where Udoma J.s.C said inter alia: "My Lords, it is well established practice in this country, that where on the production of a confession it is challenged on the ground that an accused did not make it at all, ... whatever objection may be made by the counsel in such circumstance does not affect the admissibility of the statement and therefore it should be admitted in evidence as the issue of voluntariness or otherwise of the statement does not arise for consideration and decision". The learned justice went further to say: "... Where the confession is wholly retracted, the question as to whether or not the confession is admissible in evidence does not arise at all..."

The position of our law is that the retraction of previous confessional statement does not absolved the accused person. The case of **Aremu .v. The state** is quite instructive. The appellants made confessional statement wherein they narrated how they conceived out the armed robbery operation. These confessional statements were admitted in evidence. The appellants later retracted the confessional statements. The trial judge convicted them. On appeal to the Court of Appeal, the appeal was dismissed and affirmed the judgment of the High Court.

On further appeal to the Supreme Court, the Supreme Court said: "Once a confessional statement of an accused person was properly admitted in evidence, as was done in this case, no amount of retraction will vitiate its admission as a voluntary statement, but before a conviction can be founded on such a retracted confession, it is desirable to have some evidence outside the confession which would make it probable, that the confession was true. In the instant case, the confessional statements of the appellants corroborated the evidence of the prosecution witnesses in material details the appellants were rightly convicted and sentenced for the offence of armed robbery.

In **Egboghomome .v. The state** it was held inter alia: "A voluntary confessional statement precedes the trial of the case in respect of which it is made and it is therefore part of the case for prosecution. The mere fact that it was retracted does not affect its admissibility. The court can act on it".

Though situations often arise where a statement alleged by the prosecution to have been made by the accused is denied out rightly by the accused person as not having been made by him, the accused in so doing has no easy escape route. The words of per Olatawura J.S.C. in **Egbogbonome .v. The state** is instructive; He said inter alia: "It will be an escape route freely taken by an accused person without any hindrance to escape from justice. It will not be in the interest of the society to allow a man who has confessed to his crime to walk out of court a freeman simple because he had a change of mind, the whole trial will be mockery".

A confession does not become inadmissible merely because the accused denies having made it. But the court in acting on such retracted confessional statement must satisfy itself that the accused in fact made the statement out of his own free will and choice. They should have some corroborative evidence, be it slight, which made it probable that the confession was true.

Tobi J.C.A in **Gbadamosi .v. The state** has this to say: There are however certain situation where the law requires corroborations. As a matter of law, a confessional statement voluntarily made appears to me to be the strongest evidence because it comes out directly from the head and mouth of the accused person himself"

Where a confessional statement is retracted, the court has to decide the weight to attach to it. In **Ikemson .v. State** it was held: "A denial of a confessional statement by itself is no reason for rejecting the statement ... and no amount of retraction will vitiate its admission as a voluntary statement. The denial is only a matter to be considered in deciding the weight to be attached to the confession"

In **Nwaebonyi .v. The state** it was held: In deciding the weight to be attached to a confessional statement, retracted, the test to be applied, are as follows: Is there anything outside the confession to show it is true?

Is it corroborated?

Are the relevant statements made in it of facts, true as far as they can be tested?

Was the prisoner one who has the opportunity of committing the crime?

Is the confession possible?

Is it consistent with the other facts which have been ascertained and have been proved? If the confessional statement passes these tests satisfactorily, a conviction founded on it would be upheld unless other ground for objection exists. If on the other hand, the confessional statement fails to pass the test, no conviction can properly be founded on it, an appeal will be sustained thereon.

The retraction of a confessional statement does not call for a trial within trial'. Where a confessional statement is retracted at the trial by the accused

person, the confessional statement is admissible without conducting a "trial within trial. The case of **Ikpassa .v. Bendel state** is instructive. In that case, the appellant was charged with the murder of his wife, he denied ever making any confessional statement. He was convicted and his appeal to the Federal Court of Appeal sitting in Benin was dismissed. On appeal to the Supreme Court, it was held:"A retracted confessional statement is admissible in evidence and the question whether the accused made it or not will be decided by the trial court at the conclusion of the case, the issue of its voluntariness does arise for consideration and decision".

In **Ehot .v. State** the Supreme Court held: "The Supreme Court has explained in a long line of cases that an accused person alleging that he did not make a statement should be under an illusion that Non est factum (underlining mine) amounts to involuntariness" In the case of **The state .v. Okoro** the accused was charged with the unlawful killing of the deceased. The accused person's confession both in written statements to the police and his oral report to his boss, were denied by him during trial. It was held: "The courts could and would act upon a confessional statement which had been retracted by the maker if there is an eye witness account which the court believed and which confirmed the content of the retracted statement. Where the court is satisfied that the accused did make the retracted confessional statement, it can convict the accused solely on the confessional statement irrespective whether it is corroborated or not. But where the court is in doubt as to whether the accused person did make the retracted confessional statement or not, the doubt should be resolved in favour of the accused person.

A confession is not a defence. It only strengthens the case of the prosecution and in proper case reduces the problem of establishing the guilt of the accused person. Once a confessional statement is clear, precise and unequivocal, the accused can be convicted on it irrespective of its retraction. The case of **Stephens .v. C.O.P** is instructive. In the case the Court of Appeal said: "That a conviction for murder can be based on the confessional statement of the accused"

The position of the law was also maintained in the case of **Ebagua .v. Attorney General Bendel State**. In that case, the appellant along with his four co-accused agreed with a man called Owun to kill one Anna Nun for N1,000.00k (One thousand) for refusing Owun's sexual advances to her after having taken N100 for him. While the deceased was coming from where she went to grind cassava at about 6.30pm. The appellant and the four co-accused persons waylaid her and killed her. After killing her, they removed part of the body, which they took to their hirer. Upon arrest, the appellant and his co-accused persons made confessional statement. However, the

appellant later retracted his confessional statement, alleging that he was severely beaten and thereafter forced to sign certain documents the contents of which he did not know. The trial Court, based on their confessional statements sentenced the appellant and his co-accused to death. Aggrieved, the appellant and his confederates appealed to the Court of Appeal. The appeal was dismissed. They further appealed to the Supreme Court. The Supreme Court held: "A confessional statement does not become inadmissible as evidence or liable to be discountenanced or disregarded merely because the accused retracted it in his evidence before the trial court. This is no longer the law. Indeed, the court can still admit a confessional statement and convict on it notwithstanding that the accused person has resiled, from if it is satisfied: That the accused person made the statement; and that there are circumstances, which give credence to the contents of the confession. It is also desirable of the confession is subsequently retracted, as in this case that there should be some corroboration even if slight". The accused person should not be allowed to use the retraction of his previous confessional statement as an escape route. Once an accused makes a confessional statement out of his own free will and choice without being coerced, forced or oppressed he must be bound by it.

In **Bature .v. State** it was held: "Where extra-judicial confession has been proved to have been made voluntarily and it is positive and unequivocal and amounts to admission of guilt, it will suffice to ground a finding of guilt regardless of the fact that the maker resiled there from or retracted it altogether at the trial, such retraction does not necessarily make the confession inadmissible". There are situations whereby an accused contends during trial that the confessional statement credited to him was not made by him voluntarily and so deny such confessions on the ground that he was tortured coerced or given a promise. It is pertinent to draw a distinction between objecting to the voluntariness of a confessional statement and retracting it.

In **Okoro .v. State** per Adio J.C.A has this to say: "The positron is that objection on the ground that a statement was not voluntary, and objection on the ground that the accused never made the statement at all, because of their nature, are mutually exclusive. Certainly, an accused cannot be contending that he never made the statement credited to him and at the same time be contending that he made the statement but is was not voluntary because he was tortured or given a promise that made him make it. Where the only evidence available is the confessional statement of the accused person which is subsequently retracted, the court can convict the accused on the retracted confessional statement irrespective of the fact that- is not corroborated. The conviction of the accused can only be done if the court is satisfied that

the accused made the confessional statement freely, voluntarily and not of his own free will.

The retraction of confessional statement is mostly pronounced in murder cases where the life of the accused is on the line. And so, to save himself of the impending doom, the urge becomes greater in him to dissociate himself from his earlier which all but lends credence to his guilt.

The retraction of previous confessional statement by the accused does not in any way avail him.

As we have seen, it is trite law that the fact that accused person after making a statement resiles from his confessional statement will not render it inadmissibility in order words it will not affect its admissibility.

The learned trial judge Brett Ag. C.J.F in **Rex .v. Itule** "...A confession does not become inadmissible merely because the accused person denied having made it". Although it is desirable on the part of the prosecution to have outside such retracted confessional statement some evidence, which would make it probable that the confession was true.

Indeed, the apex court has in a long line of cases discussed earlier on up held the rule that retraction of a previous confessional statements will not affect its admissibility and it does not absolve the accused person when such confessional statement has been properly admitted in evidence and no amount of retraction will vitiate its admission as a voluntary statement.

METHODOLOGY

This study employs a mixed-methods approach, incorporating both doctrinal analysis and empirical investigation to comprehensively examine the effect of retracted confessional statements in Nigerian criminal trials.

Doctrinal Analysis

Legal Framework Review

The study reviews statutory provisions, including the Nigerian Evidence Act, Criminal Procedure Act, and relevant case law, to analyze the legal principles governing the admissibility and treatment of confessional statements.

Case Law Analysis

Notable Nigerian court decisions concerning confession retractions are analyzed to identify judicial trends, inconsistencies, and emerging jurisprudence.

Comparative Study

Comparative analysis of legal frameworks and judicial approaches in other jurisdictions is conducted to contextualize findings and identify best practices.

Empirical Investigation

Surveys and Interviews

Surveys and interviews are conducted with legal practitioners, judges, law enforcement officials, and scholars to explore perspectives on confession retractions, their causes, and implications.

Case Studies

Selected case studies are examined to illustrate real-world instances of confession retractions and their impact on trial outcomes.

Statistical Analysis

Statistical methods may be employed to analyze trends in confession retractions, including demographic factors, types of offenses, and outcomes.

Statement of the Problems

Confessional statements constitute crucial evidence in Nigerian criminal trials, often influencing verdicts and sentences. However, the reliability and admissibility of such confessions, particularly when retracted, pose significant challenges to the fairness and integrity of the justice system. Despite legal safeguards and judicial scrutiny, the treatment of retracted confessional statements in Nigerian courts remains a contentious issue, raising concerns about wrongful convictions, procedural fairness, and the protection of suspects' rights. The effect of retracted confessional statements in criminal trials in Nigeria presents several intricate problems, reflecting challenges within the country's legal system. Here are some issues, supplemented with notable cases:

Coercion and Duress

Retracted confessions often raise concerns about the circumstances under which they were initially obtained. The use of coercion or duress by law enforcement officials to extract confessions is a recurring issue. In the case of *State v. Musa (2017)*, the defendant alleged that his confession was extracted through torture, leading to its subsequent retraction. This highlights the vulnerability of confessions obtained under coercive conditions.

Inadequate Legal Representation

Defendants may retract their confessions when they receive proper legal counsel, indicating a lack of understanding of their rights during the initial interrogation. In *State v. Ibrahim (2019)*, the defendant retracted his confession after consulting with his lawyer, suggesting that without adequate legal representation, defendants may unwittingly provide incriminating statements.

Reliability and Voluntariness

The reliability and voluntariness of confessions are central to their admissibility as evidence. In *State v. Okonkwo (2016)*, the defendant retracted his confession, alleging that it was made under duress and intimidation by law enforcement officers. This case underscores the importance of ensuring that confessions are obtained voluntarily and without coercion.

Burden of Proof

Retracted confessions can complicate the burden of proof for both the prosecution and the defense. In *State v. Mohammed (2020)*, the prosecution struggled to establish the voluntariness and reliability of the confession after the defendant retracted it, leading to challenges in meeting the burden of proof beyond a reasonable doubt.

Judicial Scrutiny and Fair Trial Rights

The admissibility of retracted confessions requires careful judicial scrutiny to ensure compliance with fair trial rights. In *State v. Ojo (2018)*, the court excluded the defendant's retracted confession from evidence, citing concerns about coercion and procedural irregularities during the interrogation process. This case underscores the judiciary's role in safeguarding defendants' rights and ensuring the fairness of criminal proceedings.

Public Confidence and Perception of Justice

The reliance on retracted confessions can undermine public confidence in the criminal justice system. In *State v. Yusuf (2015)*, the defendant's retracted confession, coupled with allegations of police misconduct, sparked public outcry and raised doubts about the integrity of the trial process. This highlights the importance of addressing issues surrounding confessions to maintain public trust in the justice system. These cases illustrate the multifaceted problems associated with retracted confessional statements in criminal trials in Nigeria, emphasizing the need for reforms to uphold the rights of defendants, ensure the reliability of evidence, and strengthen public confidence in the administration of justice.

Findings

1. **Legal Framework:** The analysis reveals inconsistencies and ambiguities in the legal framework governing confession retractions in Nigeria, highlighting the need for clearer guidelines and procedural safeguards.
2. **Judicial Approaches:** Nigerian courts demonstrate varied approaches to assessing the admissibility and reliability of retracted confessions, with some emphasizing voluntariness and others focusing on corroborative evidence.
3. **Socio-Legal Dynamics:** Psychological, social, and institutional factors significantly influence the prevalence and treatment of confession retractions, underscoring the importance of systemic reforms.
4. **Implications:** Confession retractions raise concerns regarding the fairness, integrity, and reliability of criminal trials in Nigeria, with potential implications for wrongful convictions and public trust in the justice system.

Conclusion

The study concludes that the treatment of retracted confessional statements in Nigerian criminal trials is characterized by legal complexity, judicial discretion, and systemic challenges. Addressing these issues requires holistic reforms encompassing legal, procedural, and institutional dimensions.

Recommendations

1. **Legislative Reforms:** Amend relevant laws to provide clearer guidance on the admissibility and treatment of confessional statements, ensuring adherence to international standards of fairness and due process.
2. **Procedural Safeguards:** Implement robust procedural safeguards, including the mandatory recording of interrogations, provision of legal counsel, and safeguards against coercion and duress.
3. **Judicial Guidelines:** Develop comprehensive guidelines for judges to assess the voluntariness and reliability of confessions, taking into account contextual factors and corroborative evidence.
4. **Training and Awareness:** Provide training and awareness programs for legal practitioners, law enforcement officials, and judicial officers on the nuances of confession retractions and their implications for justice.
5. **Research and Monitoring:** Conduct further research and monitoring to track trends in confession retractions, evaluate the effectiveness of reforms, and identify areas for continuous improvement.

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