ISSN (Online): 2455-3662
EPRA International Journal of Multidisciplinary Research (IJMR) - Peer Reviewed Journal
Volume: 8| Issue: 1| January 2022|| Journal DOI: 10.36713/epra2013 || SJIF Impact Factor 2021: 8.047 || ISI Value: 1.188

EXAMINING SIMILAR FACTS EVIDENCE IN THE NIGERIAN LEGAL SYSTEM

Oguejiofo C. P. Ezeanya, Ph.D
Department of Religion and Cultural Studies, Faculty of the Social Sciences,
University of Nigeria, Nsukka

ABSTRACT

Growth and development of the rule of law invariably affect the growth and development of the citizenry and the society at large. In order to ensure that the prejudicial tendencies of the similar facts do not outweigh their probative value the Common Law outrightly prohibited the use of similar facts for the sole purpose of proving the guilt of the accused in criminal matters. Hence it would be illogical to assert that the mere fact that an accused committed an offence earlier is enough to infer that he also committed the one for which he is standing trial. This study examines the similar facts evidence in Nigeria. The study noted that telecommunication industries could be sued in damages over poor services, and similar facts as to the knowledge of the companies as to their poor services used to get judgment against them and wake them up from their slumber. And the same tool can be used in visiting different facets of the commonwealth in enhancement of an egalitarian and enjoyable society.

KEYWORDS: ***Common law, Prejudicial, Proof of identity, Similar facts evidence, Statutory law***

INTRODUCTION

A similar fact in the context of this work means a fact which is generally similar to the fact in issue, such that the similar facts evidence is the evidence adduced to established the fact in issue based on the similarity between one or more pervious acts carried out by the accused and the one in issue. Similar facts evidence is discussed under the facts generally irrelevant and inadmissible but which may be proved in exceptional cases whereby they become relevant and admissible. They apply both in criminal and civil cases. Four groups of evidential facts fall within this umbrella and they include similar facts, character, opinion and hearsay (Eze, Obi & Ajah, 2020; Ajah, Uwakwe, Nwokeoma, Ugwuoke & Nnnamani, 2020; Ajah, 2018). Hence they are often described as the four rules of exclusion in the law of evidence.

These rules of exclusion are basically studied in reference to their exceptions as provided either in the evidence Acts or applicable under the Common Law by virtue of section 5(a) of the Evidence Act (Nwadialo, 1999; Ajah, Nnam, Ajah, Idemili-Aronu, Chukwuemeka & Agboti, 2021; Ajah, Ajah & Obasi, 2020). This work on similar facts evidence will be carried out under the following outline:

- Common law origin of similar fact evidence
- The statutory version in section 17 of the Act
- Facts bordering on common origin
- Facts showing a systematic course of conduct
- Evidence in proof of identity
- Claim of damages by domestic animals
- Conclusion

COMMON-LAW ORIGIN OF SIMILAR FACTS EVIDENCE

The case of **MAKIN V THE ATTORNEY-GENERAL OF NEW SOUTH WALES** marked the major Common Law import of the evidence of similar facts as one of the rules of exclusion. In that case, the Privy Council per Lord Herschell L.C said:

> It is undoubtedly not competent for the prosecution to adduce evidence tending to show that the accused has been guilty of criminal acts other than those covered by the indictment for the purpose of leading to the conclusion that the accused is the person likely form his criminal conduct or character to have committed the offence for which he is being tried.

This entails that as a general rule similar facts evidence are not admissible, just as hearsay evidence, character

ISSN (Online): 2455-3662
EPRA International Journal of Multidisciplinary Research (IJMR) - Peer Reviewed Journal
Volume: 8| Issue: 1| January 2022|| Journal DOI: 10.36713/epra2013 || SJIF Impact Factor 2021: 8.047 || ISI Value: 1.188

evidence and opinion evidence are also generally inadmissible but could only be specially admissible (Eze, Ajah, Nwonovo & Atama, 2021; Ajah, Dinne & Salami, 2020; Ajah & Onyejegbu, 2019). Lord Goddard in **R V SIM** criticized the above stand of the Privy Council by maintaining that the general criminal conducts of the accused should be put in the limelight in ascertaining his guilt or otherwise over a particular accusation, but the Privy Council rejected this later view (of Lord Goddard) in a subsequent case of **NOOR MOHAMMED V R** and reiterated that the judge has the duty to consider if the evidence to be adduced:

> is sufficiently substantial having regard to the purpose to which it is professedly directed to make it desirable in the interest of justice that it should be admitted. If so far as the purpose is concerned it can, in the circumstances of the case, have only trifling weight, the judge will be right to exclude it … but cases may occur in which it would be unjust to admit evidence of character gravely prejudicial to the accused even though there may be some tenuous ground for holding it technically admissible. The decision must then be left to the discretion and the sense of fairness of the judge.

By virtue of the above judgment the yardstick for the admissibility or otherwise of similar facts evidence becomes the judge's sense of fairness and the weight he attaches to the adduced similar facts (Anthony, Obasi, Obi, Ajah, Okpan, Onyejegbu, Obiwulu & Onwuama, 2021; Areh, Onwuama & Ajah, 2020). The House of Lords in **HARRIS V D.P.P** reaffirmed the stand in **MAKIN'S** case (supra). Similar facts evidence is made inadmissible on general terms because it is generally irrelevant to the fact in issue, such that the only connection between the similar facts and the facts in issue is the semblance between the two. Yet although, the similar facts are unconnected to the fact in issue, the similarity between the two may raise some reasonable suspicion of a logical link as to the similarity of their method of occurrence as to be judged relevant and admissible in proof of the fact in issue.

In order to ensure that the prejudicial tendencies of the similar facts do not outweigh their probative value the Common Law outrightly prohibited the use of similar facts for the sole purpose of proving the guilt of the accused in criminal matters. Hence it would be illogical to assert that the mere fact that an accused committed an offence earlier is enough to infer that he also committed the one for which he is standing trial. Highlighting the prejudicial tendency Lord Summer in **THOMPSON V. R** said

> No one doubts that it does not tend to prove a man guilty of a particular crime to show that he is the kind of man who could commit a crime, or that he is generally disposed to crime and even to a particular crime.

In **R.V THOMAS** trial High court convicted the accused of forgery of a letter of application to be endorsed for import license. The prosecution gave evidence of several other similar transactions carried out by the accused that had to do with import licenses. The conviction was quashed on appeal on the ground that the evidence was irrelevant to the charge before the court but was merely prejudicial in showing the appellant as a dishonest man.

Also in the civil case of HOLLINGHAM V. HEAD the same rule was applied. The issue in the action on contract was whether the plaintiff entered into contract with the defendant under certain terms. Evidence that he had previously contracted with some other people under similar terms was rejected as inadmissible in proving the substantial suit. If however the evidence was that the plaintiff contracted with other people and the defendant under the same terms, the evidence would have been admissible (Ugwuoke, Ajah & Onyejegbu, 2020; Nnam, Ajah, Arua, Okechukwu & Okorie, 2019). In another civil case of **BROWN V. LAMBETH CORPORATION** where the defendant was sued for negligence for carelessly performing a surgical operation, the evidence of other operations he had carelessly carried out was inadmissible.

Exception to the general rule as highlighted above may be seen in the items below.

THE STATUTORY VERSION IN SECTION 17 OF THE ACT

Section 17 of the Act is the only statutory exception to the general rule regarding similar facts evidence. It states:

> When there is a question whether an act was accidental or intentional, or done with a particular knowledge or intention, the fact that such formed part of a series of similar occurrences in each of which the person doing the act was concerned, is relevant.

This section of the Act hinged the exceptions on the question of whether the act being contested was accidental or intentional, or if it was done with a particular knowledge or intention. This means that if similar facts are proved against the accused person who denies the allegation of committing an offence, the similar facts become admissible by virtue of section 17 of the Act but not relevant to proving the allegation. It is only when the accused admits committing the act

ISSN (Online): 2455-3662
EPRA International Journal of Multidisciplinary Research (IJMR) - Peer Reviewed Journal
Volume: 8| Issue: 1| January 2022|| Journal DOI: 10.36713/epra2013 || SJIF Impact Factor 2021: 8.047 || ISI Value: 1.188

alleged, but raises the defence of either lack of guilty intention or that the act was accidental that the proof of the similar facts becomes both relevant and admissible (Nnam, Effiong, Iloma, Terfa & Ajah, 2021; Nnamani, Ilo, Onyejegbu, Ajah, Onwuama, Obiwulu & Nzeakor, 2021). This applies both in criminal and civil cases.

In the case of R.V. FRANCIS the accused was charged with obtaining money by false pretence that a low quality ring was of high quality. Evidence of similar representations in earlier transactions was admitted in rebutting his defence of lack of knowledge that the ring was of low quality.

In another case of **R. V MORTIMER** the accused was charged with the murder of a female cyclist whom he crushed to death with his car. He raised the defence of accidental collision, but the evidence of his similar collision with other female cyclists both earlier and later the same day was admitted. It is also admissible in counterfeit currency legislation to rebut the defence of lack of knowledge of the fakeness of the currency in possession by proving previous similar possession of such counterfeit currencies knowing them to be fake.

In **R. V. ADENIJI AND OTHERS** over the charge of being in possession on moulds for minting coins in contravention of section 148(3) of the then criminal code, the court admitted evidence of his former uttering of counterfeit coins in proof of his guilty knowledge

In **JOHN ONI AKERELE V. THE KING** a Medical practitioner convicted was accusation of manslaughter of a child by causing death through poisoned injection administered on the child through an over-dose mixture. On the defence of the appellant that it was the child's peculiar susceptibility to the effect of the drug that caused the death which would not be case with another normal child differently composed the privy council on Appeal held that the evidence of death of nine other children that died that the same time by the same drug administered by the same doctor was duly admitted by the trial court.

In **THOMAS V. COMMISSIONER OF POLICE** the appellant was charged with stealing "tote" tickets given to him to sell to the public which would always be removed from bottom of booklet. The evidence that at different times within the same year tickets were removed in the same way from the ones given to him to sell was admitted in rebutting his defence that the manager's gardener and steward who had access to the box of tickets could have stolen them. It was seen as unlikely that the servant would always help himself from the ticket that would afterwards always be the one issued to the accused to sell. The decision in this case admitting the similar facts over a denial of an allegation of stealing is obviously beyond the provision of section 17 which restricts the relevancy and admissibility to a rebuttal of the defence of lack of guilty intention or that of accident. However it is still in line with the principle in Makin's case as a rebuttal of the defence that the tickets could have been stolen by the manager's servant. Moreover the application of this wider rule could still be proper by virtue of section 5(a) of the Act. The argument here also applies to Akerele's case because the defence raised therein is beyond the provision of section 17 of the Act.

In **WILSON V. THE QUEEN** the appellant was charged with indecent assault and rape. Although the appellant pleaded guilty to indecent assault the conviction for rape was quashed by the supreme court on the ground among others that similar facts adduced of his previous similar offences was inadmissible for being irrelevant to the issues of whether the acts alleged to constitute the offence charged were done with a particular intent or knowledge, designed or accidental. This shows that there is no hard and fast rules followed in the application of the principle once there is a denial of the elements of the offence charged. The same approach to the foregoing was applied in the Gold Coast case of **NAPARO BRUIMA ALHASSAN V. COMMISSIONER OF POLICE** where the appellant faced the charge of corruption for receiving bribes from the labourers entrusted to his care to work in government farms. While quashing the conviction the West African Court of Appeal held that the evidence showing previous extortions of bribes from other people by the appellant has no relevance to the charge in issue. The court however remarked as follows:

> We would, however, like to make it perfectly clear that had the appellant, for example raised the issue by way of defence that although he had received the money in question on the date mentioned in the charge, it was not received with any criminal intent but with some such object as to buy provisions for the labourers in question then … the prosecution would have been entitled to call evidence that on previous occasions the appellant had received sums of money from labourers under circumstances similar to the present …

A defendant need not raise a defence before being rebutted by evidence of similar facts, instead it is enough that the defence is the one fairly open to the accused. The similar acts to be admitted in evidence could be done prior or subsequent to the act in issue only that it has to be within a reasonable time limit.

ISSN (Online): 2455-3662
EPRA International Journal of Multidisciplinary Research (IJMR) - Peer Reviewed Journal
Volume: 8| Issue: 1| January 2022|| Journal DOI: 10.36713/epra2013 || SJIF Impact Factor 2021: 8.047 || ISI Value: 1.188

Also a single similar act established is enough to prove admissible guilty knowledge or rebut any of the possible defences (Ezeanya & Ajah, 2021).

Similar facts evidence is also permitted by S 47 of the Evidence Act in proving guilty knowledge in the case of receiving stolen property. The Act has it as follows:

(1) Whenever any person is being proceeded against for receiving any property, knowing it to have been stolen, or for having in his possession stolen property for the purpose of proving guilty knowledge there may be given in evidence at any stage of the proceeding -

(a) The fact that other property stolen within the period of twelve months preceding the date of the offence charged was found or had been in his possession;

(b) The fact that within the five years preceding the date of the offence charged he was convicted of any offence involving fraud or dishonesty.

(2) This last mentioned fact may not be proved unless –

(a) seven days' notice in writing has been given to the offender that proof of such previous conviction is intended to be given; and

(b) evidence has been given that the property in respect of which the offender is being tried was found or had been in his possession

The principle under discussion also applies in civil cases. In **BEBEE V. SALES** a parent was sued for damages for negligently allowing his child to use an "air-gun". The proof that the child had previously destroyed a window with the same gun and the parent promised to destroy the gun but did not live up to that promise was admitted in showing knowledge of the danger constituted by the child's gun. Also in **BARRETT V. LONG** the statutory defence of apology over the case of libel was rebutted with the proof of previous libel carried our against the plaintiff by the defendant after which he apologized. Malice was therefore established therefrom.

FACTS BORDERING ON COMMON ORIGIN

Evidence of similar facts are admissible when it relates to subject matters with a common origin, such that the acts done over the subject matter are different parts of a common whole.

In **MANCHESTER BREWERY V COOMBS** the case before the court was whether or not the brewer sold good beer to the public. It was held that evidence of the beer being supplied from the same brewing was admissible whereas if the supply was from different brewing it would not be admissible. Along the same line in **WINKINSON V. CLARK** where the issue was whether the diary farmer sold good milk to a customer or not. The evidence of the delivery of milk made to another customer from the same milking and the same cows was admissible.

Section 46 of the Act enshrines this type of similar facts evidence in relation to land matters. It reads:

> Acts of possession and enjoyment of land may be evidence of ownership or of a right of occupancy not only of the particular piece or quantity of land with reference to which such acts are done, but also of other land so situated or connected therewith by locality or similarity that what is true as to the one piece of land is likely to be true of the other piece of land.

The Act contemplates the presumption that the owner of the piece of land beside the contested one has greater likelihood of being the owner of the one in dispute as they could be parts of a larger whole. In the case of **OKECHUKWU AND OTHERS V. OKAFOR AND OTHERS** just as in **MURANA AJADI V. MADAM DORCAS OLAREWAJU** the contention in both cases was the owner of the title to the disputed land respectively. It was held in the respective cases that by virtue of S.46 the person who was in possession and in enjoyment of the adjoining land to the one in dispute was also the owner of the disputed one which was argued to form part of the whole title derived from the same grant.

In **MORAH AND OTHERS V NWALUSI AND OTHERS** a successful previous litigation over adjoining land to the one in dispute was admitted in proving title to the one in dispute. However, in **IDUNUDUN AND OTHERS V. OKUMAGBA** it was held that for section 46 to apply the opponent to the party seeking title to the land in dispute must have admitted that the party in litigation with him is the owner of the adjoining lands that are not in dispute, or the trial judge would have found it to be so.

FACTS SHOWING A SYSTEMATIC COURSE OF CONDUCT

Similar acts by a person which shows a systematic course of action akin to the one in issue may be admissible. This however is more in criminal cases than in civil matters. To establish a system, one single act is not necessarily admissible contrary to the case where the issue is to rebut a defence (Enweonwu, Ugwu, Areh, Onyejegbu & Ajah 2021). Hence it is

ISSN (Online): 2455-3662
EPRA International Journal of Multidisciplinary Research (IJMR) - Peer Reviewed Journal
Volume: 8| Issue: 1| January 2022|| Journal DOI: 10.36713/epra2013 || SJIF Impact Factor 2021: 8.047 || ISI Value: 1.188

necessary to show that a particular system has been followed at different occasions such that the inference of coincidence may be unlikely. Where three or four series of identical incidents occur, all of which point to the same person the inference becomes stronger that the actions were intentionally produced rather than being coincidental accidents.

in **R.V SMITH** where the accused was in trial over the murder of his wife, evidence was allowed of two previous deaths of his wives that would always come at the bathroom shortly after the accused must have insured the wife in his favour to rebut his claim of epilepsy and infer that he killed them in order to get the insurance money. The other locus classicus under this segment is the case of **MAKIN V. ATTORNEY-GENERAL OF NEW SOUTH WALES** (SUPRA) where the accused (a woman and a man) were charged with the murder of a child whom they adopted from the mother at the payment of a small sum of money. Evidence was allowed in proof of system to show that they had previously adopted children through similar transactions after which such children would disappear and the corpses were later found buried in the compounds occupied by the accused.

In the civil case of **HALES V. KERR** evidence was allowed to show system where the barber sued for causing a customer to contact ringworm by using unsterilized razor was shown to have previously made others contact the same disease through the use of the same dangerous barbing approach.

EVIDENCE IN PROOF OF IDENTITY

This tries to identify the actual perpetrator of an act. The nature of a crime, especially an abnormal one may require an abnormal person so inclined to perpetrate it. In that case, while trying to identify the possible perpetuator previous similar acts of an accused which shows the abnormality in issue may be admissible. Exceptional abnormal propensity is very essential in allowing this type of identification through similar facts evidence. It has to be such that the alleged abnormal act is almost personified in the disposition of the accused.

This rule had been applied in some serious cases of murder and sexual offences. Hence in the case of **R.V STRAFFEN** a deceased girl was strangled and left uncovered without any act of sexual molestation. In connecting the accused with such abnormal propensity evidence was allowed of his two previous occasions of strangling girls in the same way without making any effort to hide their bodies and for no apparent reason.

In **TWOMEY V.R.** the appellant was convicted of the murder of a deceased homosexual who was violently killed. The appeal court upheld the allowance of the trial court of the similar facts evidence showing how the appellant who already confessed to be a violent homosexual who unsuccessfully tried to establish the involuntariness of the confession had been found at the scene of the murder at relevant time and had previously been given to violent homosexuality.

This principle also applies in civil cases. In the case of **BLAKE V. ALBION LIFE ASSURANCE SOCIETY** the insurance company was held liable in the suit against it over its knowledge of the fraudulent acts of its employee in obtaining premium from clients in the past.

CLAIM OF DAMAGES BY DOMESTIC ANIMALS

Although domestic animals are not liable in causing damages, yet where the owners know of the danger posed by their animals and hide under the presumption that such animals are not vicious or dangerous by nature, evidence of previous damages by the animals known to the owner is admissible. Hence in **LEWIS V. JONES** the fact that the defendant's dog had previously killed the sheep of the plaintiff was held admissible in proving the killing of another sheep of the plaintiff which is in issue.

CONCLUSION

Similar facts evidence having been reviewed should not be confused with character evidence as in sections 69 and 160 of the Act. Although they are related together with hearsay and opinion evidence for being rules of exclusion yet each has its unique principles and applicability. Growth and development of the rule of law invariably affect the growth and development of the citizenry and the society at large. Some of the issues highlighted, especially the civil cases can be advanced in redressing certain social anomalies in ensuing a better society. Some telecommunication industries could for instance be sued in damages over poor services, and similar facts as to the knowledge of the companies as to their poor services used to get judgment against them and wake them up from their slumber. The same tool can also be used in visiting different facets of the commonwealth in enhancement of an egalitarian and enjoyable society.

REFERENCES

1. *Ajah, B. O, Uwakwe, E. E., Nwokeoma, B. N., Ugwuoke C. O., & Nnnamani, R. G. (2020). Ameliorating the plight of awaiting-trial inmates in Ebonyi State, Nigeria through reasonable bail condition. Pertanika Jounal of Social Sciences & Humanities, 28 (4), 2897 – 2911.*
2. *Ajah, B. O. (2018). Educational training of inmates in Awka and Abakaliki Prisons, Nigeria. Journal*

ISSN (Online): 2455-3662
EPRA International Journal of Multidisciplinary Research (IJMR) - Peer Reviewed Journal
Volume: 8| Issue: 1| January 2022|| Journal DOI: 10.36713/epra2013 || SJIF Impact Factor 2021: 8.047 || ISI Value: 1.188

International Journal of Criminal Justice Sciences. 13 (2), 299- 305

3. *Ajah, B. O., & Okpa, J. T. (2019). Digitization as a solution to the problem of awaiting- trial inmates in Ebonyi State, Nigeria. International Journal of Criminal Justice Sciences, 14 (2), 199–207.*
4. *Ajah, B. O., & Ugwuoke, C. O. (2018). Juvenile Justice Administration and Child Prisoners in Nigeria. International Journal of Criminal Justice Sciences, 13 (2), 438–446.*
5. *Ajah, B. O., Nnam, M. U., Ajah, I. A., Idemili-Aronu, N., Chukwuemeka, O. D., & Agboti, C. I. (2021). Investigating the awareness of virtual and augmented realities as a criminal justice response to the plight of awaiting-trial inmates in Ebonyi State, Nigeria. Crime, Law and Social Change, DOI:10.1007/s10611-021-09988-5.*
6. *Ajah, B. O., Nwokeoma, B. N., & Okpan, S O. (2017). Socio-economic implication of kidnapping and hostage taking in Southern Nigeria. Journal of Law and Judicial System, 6 (2), 51-59.*
7. *Ajah, B.O., Ajah, A.I., & Obasi, C. O. (2020). Application of Virtual Reality (VR) and Augmented Reality (AR) in the Investigation and Trial of Herdsmen Terrorism in Nigeria. International Journal of Criminal Justice Sciences, 15 (1), 1-20.*
8. *Ajah, B.O., Dinne, C.E., & Salami, K. K. (2020). Terrorism in Contemporary Nigerian Society: Conquest of Boko-Haram, Myth or Reality. International Journal of Criminal Justice Sciences, 15 (1), 312-324.*
9. *Ajah, O. B., & Onyejegbu, D. C. (2019). Neo-Economy and Militating Effects of Africa's Profile on Cybercrime. International Journal of Cyber Criminology, 13 (2), 326–342.*
10. *Anthony, E.O., Obasi, C.O., Obi, D.O., Ajah, B.O., Okpan, O.S., Onyejegbu, C.D., Obiwulu, A. C., & Onwuama, E. M. (2021). Exploring the reasons for perennial attacks on churches in Nigeria through the victims' perspective. HTS Teologiese Studies/Theological Studies, 77(1), a6207.*
11. *Areh, C. E., Onwuama, E. M., & Ajah, B. O. (2020). Social consequences of wife-battering in Ogbaru and Onitsha north local government areas of Anambra State, Nigeria. FWU Journal of Social Sciences, 14 (4), 80-92.*
12. *CAP E 14 laws of the Federation 2004 (hereinafter also referred to as the Act).*
13. *Enweonwu, O. A., Ugwu, I. P., Onyejegbu, D. C., Areh, C. E., & Ajah, B. O. (2021). Religious fanaticism and changing patterns of violent Crime in Nigeria. International Journal of Criminology andSociology, 10,1378–1389. https://doi.org/10.6000/1929-4409.2021.10.158*
14. *Ezeanya, O-C.P. & Ajah, B.O., 2021, 'Addressing the biblical and ecclesial obligation of NigerianRoman-Catholic priests in promotion of peace and social justice', HTS Teologiese Studies/ Theological Studies 77(4), a7138. https://doi.org/ 10.4102/hts.v77i4.713.*
15. *Eze, O. J., Obi, D. O., & Ajah, B. O. (2020). Nigerian criminal justice system and victims of crime neglect in Enugu Urban. FWU Journal of Social Sciences, 14 (3), 41-53.*
16. *Eze, O.J., Ajah, B.O., Nwonovo, O. S., & Atama, C.S. (2021).Health sector corruption and COVID-19 outbreak: evidence from Anambra and Enugu States, Nigeria. Journal of Contemporary AfricanStudies, DOI:10.1080/02589001.2021.192112.*
17. *Nnam, M. U., Ajah, B. O., Arua, C. C., Okechukwu, G., & Okorie, C. O. (2019). The War must be Sustained: An Integrated Theoretical Perspective of the Cyberspace- Boko Haram Terrorism Nexus in Nigeria. International Journal of Cyber Criminology, 13 (2), 379–395.*
18. *Nnam, M.U., Effiong, J.E., Iloma, D.O., Terfa, I.M., & Ajah, B.O. (2021) Hazardous drinking and the dark triad: an antidote for manipulative behaviour among students. Current Psychology, 40(4), 1-7.*
19. *Nnamani, G.R., Ilo, K.O., Onyejegbu, D. C., Ajah, B.O., Onwuama, M. E., Obiwulu, A. C., & Nzeakor, O. F. (2021). Use of Noncustodial Measure and Independent Monitoring Body as Panacea to Awaiting-Trial Problems in Ebonyi State, Nigeria. International Journal of Criminal Justice Sciences, 16 (1), 51-63.*
20. *Nwadialo F. (1999) Modern Nigerian law of evidence, second edition. Lagos, University of Lagos Press 165.*
21. *Ugwuoke, C. O., Ajah, B. O., & Onyejegbu, C. D. (2020). Developing patterns of violent crimes in Nigerian democratic transitions. Aggression and Violent Behavior, 53, 1-8.*