

AN EXAMINATION OF THE CONSTITUTIONAL RIGHTS OF RELIGION AND CHALLENGES FOR ITS SUSTAINABLE IMPLEMENTATION IN NIGERIAN SCHOOLS

By

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Abstract

The 1999 Constitution of the Federal Republic of Nigeria provides, among other things, for the rights of citizens to choose their religious faith without state influence and for the society to maintain secularism. This study looked at the constitutional provision and assessed the realities on ground, raising issues as to whether the citizens were truly free to choose the religion of their choice in any part of Nigeria. The study used documentary research method to access the primary and secondary sources of information. The study found that although the Constitution provides for a secular state and the freedom of choice of faith, it cannot be asserted wholly that Nigeria is a secular state given various forms of compulsion that go with religion and religious practices and the implications of this for child upbringing and socialization in Nigeria. It is recommended that section 10 of the 1999 constitution should be amended to clarify the time, meaning of secularism while section 38 on the rights to freedom of religion should be implemented effectively.

Keywords: Constitutional religious rights, Sustainable practices in schools.

Introduction

Nigeria as a nation is bedevilled with so many problems, threatening to pull it down. These problems are many and appear very difficult to overcome. But over the years, despite the enormity of these problems which had been with the nation since independence, the country still wobbles on, hoping that it will get to a stage it will be able to fully address and resolve them. These problems relate to politics, resource control, ethnicity, and the chief of them all, religious crisis.

This paper identifies religion as a very important aspect of Nigerian life, and the major problem confronting it. It is doubtful whether religious internalizations and socialization have profited Nigerians, with deep-seated moral crises which the nation has witnessed in the last six decades of its existence. Perhaps, Nigeria is one of the most badly governed political entities in the world with critical incidences of lack of good governance such as disregard for rule of law, lack of transparency, lack of accountability and dishonesty exhibited by political leaders (Salawu, 2021). In the study, Salawu (2021) examined the constitutional immunity of the executive and the challenges it posed for the executive. Although partly relevant to this study, its conclusions that abuse of office, violation of the rule of law, lack of transparency and public

service dishonesty corroborated what could be the outcome of religion without morals, despite the high level of religiosity in Nigerian society.

Nigeria is purported to be a secular state and all citizens are, by the constitution, free to practice the religion they choose. Hence, there are multiple religions in Nigeria apart from Christianity and Islam. There are more than 200 deities in Yorubaland alone, not to talk of other parts of the country. Hence, Nigeria has been described as “deeply religious people and religious shape their lives significantly” (Atsenuwa, 2016). Looking at the issue of religious diversity in Nigeria, the author identifies Islam and Christianity as the two major religions while various forms of African Traditional religions (ATRs) existed alongside vestiges of other religious faiths such as Ba’hai, Eckanker, Grail Message and Buddhism, among others especially among the foreigners.

It is apt to state that Nigeria is at the centre of politics, social relations and governance, this is the reason an appraisal of religion cannot do but discuss good governance, political participation, voters’ apathy, mutual trust and socio-economic harmony. Hence, the focus of this study to examine the following:

This paper examined the constitutional provisions on rights to religious freedom and the challenges to the implementation of these rights in Nigerian schools.

- (i) religious diversity in Nigeria
- (ii) the constitutional rights for freedom of Nigerians under the 1999 Federal Republic of Nigeria, and
- (iii) challenges to the constitutional rights to freedom of religion.

Research Methodology

The researcher used documentary approach in his study scrutinising the Nigerian constitution and other library and internet based sources to juxtapose his arguments and stand on the research. Detailed discussions followed on the provisions for the rights for freedom of religion, challenges facing the effective implementation of the policy in schools and recommendations.

Religious Diversity in Nigeria

Nigeria is a nation of more than 200 million people. According to Apenda & Anyam (2011), the high population figures point to the unhealthy competition which goes on over the available resource and it has been observed that such is expected to escalate so long the population keeps on growing in geometric proportion. The increasing high population is a threat to ecological development, bio-diversity, land use and other resources (Atsenuwa, 2016). It also contributes to the struggle for land use and allocation, the root cause of Fulani herdsman conflicts in Nigeria (Blench, 2010; Effonga, 2016; Abdullahi, 2016).

The role of religion is all encompassing, especially in a developing country like Nigeria. According to Apenda & Anyam (2011), religion is “aspect of human experience that may interest, incorporate or transcend other aspects of life and society.” The broad definition above goes beyond the categorization of religion as western or biblical categories such as monotheism or eastern/oriental as Islam, but rather views religion as the relationship between man and the Supreme Being, (Olodumare, Chukwu and Ubangidi, among the major ethnic groups of Yoruba,

Ibo and Hausa in Nigeria, respectively). Thus, it may be contented that even before the advent of Islam and Christianity, the ethnic groups living in areas presently called Nigeria were never pagans; they believed in the Supreme Being, although through the lesser gods.

In Nigeria, like most parts of Africa, religion cannot be divorced from other aspects of living. Religion exists in the culture, vocation, practices of the people and regulates their values, their practices, their hopes and aspirations. It regulates and guides the child upbringing, the education and socialization of the youths and their value orientation.

In order to practice the religious-cultural attitude prevalent in Nigerian society, many laws, customs, sets of behaviours, regulations, rules, observations and taboos combine to constitute the moral code and ethics in the community (Apenda & Anyam, 2011; Atsenuwa, 2016). It is a fact that some of the above religious/cultural attitudes are regarded as sacred and; therefore, believed to have been instituted by the Supreme Being or Community. Therefore, any breach of this code of behaviour is considered evil, for it is regarded as a serious injury or destruction to accepted social order, capable of destroying the social continuity.

In many states, especially in the three geo-political zones of Northern Nigeria, it does not appear that the issue of secularity and rights to freedom of religion of state does have any allurements. A case in point, is the recent killing of Deborah Samuel, a 200 – level student of the Sheu Shagari College of Education, Sokoto on an allegation of blasphemy. Amaechi (2022) who reported the incident noted that fundamentalists had killed citizens through self-help like the case of Deborah over the years, without any meaningful action from the law enforcement arm of the government. The most troubling aspect of the blasphemy issue was that most of those who supposed to speak out, including a knowledge-driven body like National Association for the Study of Religions and Education (NASRED) and other enlightened Islamic scholars whose voices would have changed the narrative kept mute. It was to the credit of Nasru-lahi-hi-fatihi Society (NASFAT) an Islamic organization that it came out openly to state that such killing was alien to Islam (NAN, 2022). No religion, even upon the commission of an offence, allowed self-help. Rather, the offender should be given fair hearing, a basic aspect of which is self defence to prove her innocence or accept her guilt (Ajogun, 2010). The action of Sultan of Sokoto as the head of Muslim community in Nigeria cleared the above position when His Eminence condemned the killing in his domain in strong terms, even in the heat of the moment (Auwai, 2022).

Apart from the above, the use of religion to spread hatred and division is becoming rampant. In the choice of aspirants for various political positions, religion, rather than competence and capability has been the major criterion for leadership (Sahabi, 2022). Perhaps, a burning issue which is threatening political barometer of the nation is the ‘muslim-muslim ticket’ chosen by a political party, All Progressive Congress (APC). It has become another terminology for the expression of the citizens ‘view of religious intolerance, from both divides. Sahabi (2022), while interrogating the former secretary to the Government of the Federation (SGF), Babachir Lawal, a Christian, on the muslim-muslim ticket, the politician reacted that such a move would cause division as there should be no religious balancing. Speaking, Babachir directed this to the APC Presidential Aspirant in 2023 Presidential Election, Asiwaju Bola Ahmed Tinubu:

You will antagonize Christian majority in this country. It's a direct attack on them and even in your zone, because when it comes to religion, Nigerians take religion first.

The above statement from a prominent national leader and a Christian from the North points to the fact that Nigerians place priority on religion for their leaders. However, it appears that not such priority is placed on the good governance if the leaders come into power through religion.

Examining this phenomenon of using religious criterion for leadership selection and subsequent corruption of the leaders thus chosen, Adenugba & Omolawai (2014) highlighted a symbiotic relationship between Christianity and corruption. The authors observed that all other things being equal, with increased spirituality, there ought to be low corruption. They further observed that the situation in Nigeria was such that not only religion had failed to reduce corruption, but religion itself had become a channel of corruption in the society (Adenugba & Omolawai, 2014). In the same vein, the Islamic viewpoint on corruption was expressed by Rufai (2015) when he advocated a paradigm shift in the handling of the Islamic religious framework against corruption. He attributed pervasive corruption to the influence of fascist culture, values and ways as a result of colonialism and neo-colonialism. This writer wishes to humbly dissent from this viewpoint which fails to account for the socio-cultural failures in various communities in Nigeria, including *Almajiri* system in Northern Nigeria. *Almajiri* is an Islamic educational system which is believed to breed banditry and insurgency, the double menaces facing the Nigerian polity (Omilusi, 2015).

It is instructive to note that the Nigeria religious landscape portends serious dangers for the polity given the present crises at social, political, economic and ethnic levels. Folajinmi (2015) sees religion as the criterion for assessing power, and this perhaps has added to social mistrust, fear of other ethnic groups who live within communities and general hostilities for the herdsmen in southwest Nigeria, in particular and other parts of the country in Nigeria. The herdsmen are migrant Fulani who are predominantly Muslims and whose names have been linked to various insecurity challenges facing Nigeria (Folajinmi, 2015, Baca, 2015).

Constitutional rights of Religion in Nigeria

The 1999 Constitution of the Federal Republic of Nigeria (otherwise referred to as 1999 (FRN) makes ample provisions for the freedom of religion in Nigeria. The legality of religious thoughts has been premised on two fundamental philosophies, namely the secularity of the state and the fundamentality of the right to freedom of religion (Atsenuwa, 2016). These two premises are recognized as being central to the rights of religions in Nigeria, the 1999 CFRN being the supreme laws and having binding force on all other authorities and persons in Nigeria.

Section 1(1) of the Constitution States:

This Constitution is Supreme and its provisions shall have binding force on all authorities and persons throughout the Federal Republic of Nigeria.

Based on the above understanding, this paper proceeded to examine the Constitution for the basis of the secularity of Nigeria and the nature and extent of the freedom of religion or beliefs guaranteed.

Nigeria as a Secular State

The 1999 CFRN affirms that Nigeria is a secular state. Section 10 of the Constitution states simply:

“The Government of the Federation or a State shall not adopt any religion as State Religion.”

Having been under Chapter II of the Constitution, it falls under the powers of the Federal Republic of Nigeria. The section clearly indicates that religion is a private, personal affair of the individuals and it does not affect the State in any way. What concerns the State is to ensure that no individual is coerced to follow any religious belief or creed and to ensure freedom to exercise one’s faith without fear. Malemi (2012) argues along that line when the learned writer commented that this aspect of the constitution makes religion a private matter. Based on the above, it appears the role and duty of the State is to provide a level playing ground for all citizens who are interested in religious matter in practising their faith.

By the interpretation of another learned writer, Atsenuwa (2016), the meaning and scope of Nigeria’s secularization under the constitution is for the government not to ‘adopt’ any religion as a state religion. The learned author further argues that section 10 of the 1999 CFRN suggests that non-adoption of a religion as State religion does not suggest “absolute non-involvement of the State in religion” and for this reason, the author supports provision of financial support to the activities of religious communities such as construction of places of worship, support for individual’s holy pilgrimages. This type of interpretation leans towards government supporting activities and programmes of religious bodies.

However, in recent years, these practices have been criticized by various religions as favouritism or adoption by preferential support, of the activities of some religions. In many parts of the federation, two religions are prominent, namely Islam, Christianity with African Traditional Religion (ATR) relegated to the background (Magbadelo, 2003). The support for the two major religions have created the impression of their adoption as recognized religions. But in some states, like Osun in the last decade, support has been given for the ATR by granting ‘Isese’ Holiday, and government participation in its activities, including recognition at public functions. It appears that if all states can adopt this policy, it may go well to satisfy the secular status of Nigeria as interpreted by some scholars.

On the other hand, secularization in section 10 may be argued that to the extent of the constitutional provision on secularity of the state, there should be no room for the overt and covert engagements of the state in religion as governments in Nigeria are known for (Atsenuwa, 2016). It is argued that there should be absolute abstinence from involvement in religion, by keeping it private and personal, that it is possible so avoid real or fake accusations of adoption of a religion or the other as state religion if that is done. Much as this argument would have been, it is apt to observe, rather unfortunately, that religion has never been separated from national affairs since independence in 1960 with the trails of accusations and counter accusations of state adoption of religion.

It is even doubtful if people expect less than this ambivalent attitude of the involvement of the state in the activities of religion. The recognition and the establishment of the Hajj Commission, Christian Pilgrims, Welfare Commission; the National Mosque; the National Cathedral; Imam of the Aso Rock Mosque; the Chaplains of the Aso Rock Church, among others appear to be a derogation of the secularity status of the state at the expense of the Muslims and Christians who are obviously the largest religious groups.

In the opinion of this writer, given various involvements of the state in religion, obviously in favour of the major religious, Nigeria is not a secular state. The Nigerian constitution in its section 10 never says that the state is secular too. Rather it can only be described as a multi-religious state. Religion is not a private and personal matter in Nigeria; it is a demographic index required to register for National Identity Card; National Passport; Bank National Identity and Driver's Licence.

It has now got to the extent of demanding religious representation in political posts and national governance (Yafugborhi, Ahon, Marame, Bello, Ajayi & Jannamike, 2022). The nationwide report from the reporters indicated that members of the All Progressive Congress (APC) in the 19 Northern States who were Christians denounced the 'Muslim-Muslim ticket' and resolved not to campaign for their party any more. The umbrella association for Christians in Nigeria, Christian Association of Nigeria (CAN), unanimously left the rejection of APC and its 'Muslim-Muslim-Ticket' to Nigerians (Nwabuike, 2022).

Right to Freedom of Religion

The second aspect of the constitutional provisions on religion is the right of an individual to embark on practice of any religion of his/her choice without molestation. Section 38 affirms that:

- (1) Every person shall be entitled to freedom of thought, conscience and religion, including freedom to change his religion or belief, and freedom (either alone or in community with others, in public or private) to manifest and propagate his religion or belief in worship, teaching and practice.
- (2) No person attending any place of education shall be required to receive religious instruction or to take part in or attend any religious ceremony or observance if such instruction, ceremony or observance relates to a religion other than his own, or a religion not approved by his parent or guardian.
- (3) No religious community or denomination shall be prevented from providing religious instruction for pupils of that community or denomination in any place of education maintained wholly or by that community or denomination.
- (4) Nothing in this section shall entitle any person to form, take part in the activity or be a member of secret society.

By these expansive provisions, the 1999 CFRN guarantees the right to freedom of thought, conscience and religion. In a multi-ethnic, multi-religious and multi-cultural system like Nigeria, the import of section 38 of the constitution cannot be overstressed. According to Malemi (2012), a person is at liberty under the constitution to believe, or change his religion or worship, teach and practices religion.

Although the right to freedom of religion provides effective legal protection for many Nigerians as individuals and as religious communities, it may be contended that based on section 38(1), individuals of different faiths and beliefs are able to struggle for space and feel entitled to protection against others and the state. However, section 38(1) is too often violated. A number of Nigerians experience gross violations of this right especially in the private sphere (Atsenuwa, 2016). When people show the intention to change their religion or belief, they are often persecuted in contrary to the provision of the constitution. Religious communities were also not exempted from attacks where more than 40 persons were murdered and killed in Kaduna and Edo states (Adedipe & Oyewo, 2022) and many houses of worship were vandalized daily (Ezigbo, 2022).

In these situations, it is very difficult to make any objective assessment of the impact of the right to freedom of religion on the citizens, given the facts that they were being hunted and killed daily out of their places of worship; kidnapped and raped as the case may be. The situation in southern Kaduna and parts of Plateau and Benue States appear so deplorable that one wonders if there is any law in Nigeria.

On section 38 (2), this provision is not given any respect in Nigeria. although two religions, Islam and Christianity are widely practised and recognized, there appears to be underlying hostility when it comes to the opportunity of practising the religion. In southern Nigeria, there appears to be religious tolerance between the two religious and among other religions such as African Traditional Religion (ATR). However, while Christianity and ATR are tolerated in Southeast and southwest Nigeria, it does not appear to be so in Northern Nigeria (Northeast, Northcentral and Northwest) where various wars linked to extremism in religion are being waged against Nigerians.

Apart from open confrontations, in all parts of Nigeria, religious mindsets of the believers appear to have been focused on each religion and its followers. This can explain constant insecurity problems linked to religion.

Section 38 (3) provides that no religious community or denomination shall be prevented from providing religious instructions for pupils of that community or denomination in any place of education maintained wholly by that community. It is instructive to observe that only Islam and Christianity as religions have their religious instructions provided even in the state schools. ATR and other religions do not have opportunities of curriculum offering in schools.

Subsection 4 of section 38 appears the most troubling when it comes to the religious rights of individuals and communities. The section provides that “nothing in the section shall entitle any persons to form or take part in the activity or be a member of a secret society.” It has been contended by Atsenuwa (2016) that this constitutional provision removes the level playing field granted to all religions in sub-section 38(1). This restriction appears to have unfairly targeted ATRs as many of them have secrecy attached to their modes of worship. However, in practice, government has done little, in reality, to curtail the religious rights of those who are members of religious groups that may fall within the class Secret societies, for example Oro secret societies, which prohibit any woman to see it when the rite is carried out is tacitly approved by the government and instructions and warnings of the celebrations are often issued by the government or its agencies.

Challenges to Constitutional Freedom of Religion

The 1999 CFRN makes key provisions for the Nigeria as a secular state and the rights to freedom of religion in Nigeria. These provisions as contained in section 10 and 38 of the constitution are ample and detailed, but just like most of the laws in Nigeria, there are some problems of implementation. These implementation problems are central to the peaceful co-existence of religions and the overall security of the nation.

Ogbu (2014) observes that perceived state favouritism to Islam in particular is a major constraint to the implementation of the rights to religious freedom under the Nigerian constitution. The author contends that while most Christians argued for separation of the Nigerian state from religion, most Muslims advocated the fusion of religion, state and the law. He added that ‘to Muslim, Sharia govern the totality of the way of life of a Muslim from cradle to grave.’ This is a grave impediment to the implementation of the secular status of Nigerian state. While Christians view the attitude of the state, which most of the time is being under the watch of the Muslims, to Islam, it blames governments on attempts to Islamize the nation, join Organization of Islamic Conference and all sorts. This has seriously undermined Nigerian unity.

Occurrence of insecurity and violence have threatened the peaceful and harmonious mutual religious interactions. Barkindo & Dyikuk (2022) opine that like in all multi-religious countries of the world, where insecurity and violence are used to supplant secular constitutions with theocracy, Nigeria is no exception. In Nigeria, the two sources of violence identified by the scholars are Boko Haram Insurgency in the Northeast and the radical Fulani militants. Added to this could be the ongoing banditry and kidnapping, especially of high ranking Christian Clerics and targeting of Catholic Churches (Adedipe & Oyewo, 2022). All these are linked to religious fundamentalism.

Another major constraint is the provision of section 10 which makes Nigeria a secular state. Nike Tobi, JSC (1995) while commenting on section 11 C of the 1989 Constitution now equivalent of section 10 of the Constitution) states:

There is a general notion that section 11 (of the 1989 Constitution, now the equivalent of section 10 of the 1999 constitution), makes Nigeria a secular nation. That is not correct. The word secular etymologically means pertaining to things not spiritual, ecclesiastical or not concerned with religion. Secularization, the noun variant of the adjective, secular, means the belief that the state’s morals, education etc, would be independent of religion. What section 11 is out to achieve is that Nigeria cannot for example adopt either Christianity or Islam as a State religion. But that is different from secularism.

The ambiguity introduced by section 11 of the 1989 Constitution (now section 10 of 1999 constitution) by the use of ‘adoption’ has not been resolved. The impression many Nigerians have is that the constitution makes Nigeria a secular state. That is not the correct position as the Constitution merely forbids the state from adopting a religion, it does not stop the state from imbibing all religions.

Conclusion

In concluding this paper, it is apt to state that religion forms a very crucial aspect of the lives of Nigerian people. It determines mostly their modes of interaction, dressing patterns, religion, culture and values. Hence, the study was on the examination of the rights to freedom of religion under the 1999 CFRN. Due to the pluralistic nature of religion in Nigeria, there have been frictions, which effective implementation of the rights may go a long way to redress. However, it was the finding of this study that a lot still need to be done if the rights would become achievable. It is the conclusion of this study that while reforms of section 10 on secularization is desired, there is need for effective implementation of section 38.

Way Forward

The following recommendations are hereby made as the way forward for ensuring the achievement of the rights to freedom of religion in Nigeria:

- (i) that section 10 of the 1999 CFRN be amended to reflect the intention of Nigerians, namely, not to have an anointed religion;
- (ii) that section 38(1) which guarantees freedom of religion, thought and conscience should be implemented equally and fairly to take care of all religious interests, fears and concerns in Nigeria;
- (iii) that school-going youths should be exposed to basic rudiments of what constitute secularism and the rights to freedom of religion as part of religious socialization in social studies classroom.
- (iv) teachers and teacher-trainers be exposed to training on how to incorporate functional religious freedom and equality of access treatment in the curriculum
- (v) that other religious communities should be encouraged by the government to provide religious instruction for the pupils of the community or the denomination in any place of education without molestation;
- (vi) that caution be taken by the government in the quest to declare activities of some religions, especially ATRs, as secret cults; and
- (vii) that the current practice of recognizing and encouraging other religions, especially ATRs, as done in Osun State by granting public holidays for 'Isese Festival' should be emulated and encouraged by other states of the federation for religious harmony.

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