

A CRITICAL EXAMINATION OF VODOO PHENOMENON AND OTHER CONTROL MECHANISMS IN THE FIGHT AGAINST HUMAN TRAFFICKING IN NIGERIA

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Abstract

The most recognised and distinct dimension of the Nigerian version of human trafficking is the continuous use of voodoo to charm potential and actual trafficked persons. The use of voodoo and other control mechanisms constitutes an important aspect that aids human trafficking and enables traffickers to get illegal profit in Nigeria and other parts of the world. Voodoo and other control mechanisms has been a fundamental lubricant of trafficking in women and girls in Nigeria for sexual exploitation. The aim of this paper is to critically examine the use of voodoo and other control mechanisms such as witchcraft, force, coercion, deception, threat, oath –taking which have consistently made human trafficking to thrive in Nigeria. This paper concluded that the use of voodoo and other control mechanisms shall continue to thrive and escalate human trafficking in Nigeria if not brought under control. This paper recommended that to eradicate the continuous use of voodoo and other control mechanisms in human trafficking by traffickers, the government should make the punishment stricter by increasing the terms of imprisonment, remove the fines in the Trafficking in Persons (Prohibition) Enforcement and Administration Act (TIPPEAA) 2015. If the terms of imprisonment carries higher terms of 12, 15 years to 20 years like what is obtainable in other jurisdictions like the United Kingdom under the Modern Slavery Act of 2015 and the Dutch Criminal Code 1886 in Netherlands trafficking will be reduced to the barest minimum. But if the court continues to give lower sentences like 1 year, 5 years and 7 years as stipulated under the TIPPEAA 2015 presently human trafficking shall continue to thrive and traffickers will have no fear of committing or indulging in the crime every time. The law enforcement agencies should put more effort to arrest voodoo priest/ priestess and prosecute them. NAPTIP should also make efforts to making traditional chiefs and herbalist anti-trafficking ambassadors to stem the tide of the use of voodoo and other control Mechanisms of human trafficking in Nigeria.

1.0 Introduction

This paper critically examines voodoo phenomenon and other control mechanisms in the fight against human trafficking in Nigeria. It is observed that the term ‘voodoo’ is not stated in TIPPEAA 2015 but it is implied therein. The TIPPEAA 2015 Act¹ is the law governing the offence of human trafficking in Nigeria. Traffickers use voodoo and other control mechanisms like witchcraft, oath-taking, coercion, deception, intimidation, force, threat to defraud, trick, threaten, intimidate or coerce victims of human trafficking. The voodoo phenomenon and other control mechanisms are used by traffickers in human trafficking to exert pressure over the victims of human trafficking.² The use of voodoo and other control

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¹TIPPEAA 2015, s.82.

²Myria, Federal Migration Centre, Trafficking and Smuggling of Human Beings: Minors at Major Risk[2018]Annual Response<<https://www.myria.be/en/publications/annual-report-trafficking-and-smuggling-of-human-beings> accessed 2 July 2023.

mechanism act as a form of mental coercion aim at reducing the need to use physical violence.³ Voodoo and other control mechanisms play an important role in enslaving victims without making a distinction between all the supernatural forces involved in human trafficking. It seals the agreement between victims of human trafficking who want to move to Europe for better life and traffickers who is seen as a small god and their helper. Traffickers commit to pay all costs of the journey, while the victims promise to repay the money, be respectful to the traffickers and vow not to reveal the identity of the traffickers to the police.⁴

2.0 The Use of Voodoo in the Fight against Human Trafficking in Nigeria

There is no express provision with regards to voodoo under the TIPPEAA 2015⁵ but it is impliedly mentioned with the use of words like ‘threat ‘intimidation’, ‘force’, ‘coercion’ deception in TIPPEA⁶. Voodoo exert pressure over the victims⁷ and the use of voodoo makes victims of human trafficking loyal to the traffickers because they want to live a better life. The adverse power exerted over the trafficked victims is so enormous that they dare not disobey the trafficker. In this manner, traffickers can control their victim from a distance and ⁸no additional person is required to assist them.⁹

Voodoo is used by Nigerian human traffickers, to control, subjugate victims for sexual exploitation in various parts of the world.¹⁰ The use of voodoo as means of control is a form of exploitation on the victims of human trafficking. The Constitution of the Federal Republic of Nigeria 1999(CFRN) as amended forbids any form of exploitation of human beings.¹¹ With respect to the definition of human trafficking in article 3(a) of the United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children(Palermo Protocol), supplementing the United Nations Convention against Transnational Organized Crime 2000, human trafficking is defined as the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. The voodoo phenomenon though not expressly stated in the Palermo Protocol is implied in the definition of human trafficking with the use of the words like ‘threat ‘or use of ‘force; or other forms of ‘coercion’, or ‘abduction’ or ‘fraud’, or ‘deception’.¹²The Palermo Protocol provides a comprehensive description of the problem of human trafficking and recognises multidimensional manifestations.¹³The definition of human trafficking according to the Palermo Protocol entails physical, psychological and sexual abuse. The

³*Ibid*

⁴UNHCR, ‘Voodoo, Witchcraft and Human Trafficking in Europe’

<http://www.ecoi.net/file_upload/1930_1382531731_526664234.pdf> accessed 22 May 2023.

⁵Trafficking in Persons (Prohibition) Enforcement and Administration Act (TIPPEAA) 2015.

⁶TIPPEAA 2015, s.82

⁷Myria (n 2).

⁸Myria (n 2).

⁹*Ibid*.

¹⁰Myria (n 2).

¹¹CFRN 1999 (as amended), s 17(2) (d).

¹²Palermo Protocol, art 3.

¹³*Ibid*.

psychological abuse aspect of the definition can be linked to voodoo and other superstitious beliefs of victims that are imbued in their psyches as members of a certain society, community or culture.¹⁴

The use of voodoo as a control mechanisms in human trafficking is one of the means that facilitates the trafficking of victims in Nigeria.¹⁵ It has been and is still a fundamental lubricant of trafficking victims of human trafficking in Nigeria for sexual exploitation.¹⁶ Voodoo basically consists of an oath-taking in the presence of a voodoo priest or priestess, in which victims swear to pay off their debt, be obedient and loyal to the trafficker.¹⁷ Voodoo plays a major role in enslaving trafficked persons without making a distinction between all the supernatural forces involved in human trafficking. One of the major characteristic of the Nigerian trafficking system by the traffickers is the use of threats of voodoo curses to control victims and force them into situations of prostitution.¹⁸ Once arrangements for victims' trips abroad are completed, traffickers seal the deal by taking the victims to shrines where the voodoo priests administer oath on the victims.¹⁹

Human trafficking is on the rise in Nigeria as a result of the voodoo phenomenon and traffickers' benefits from it. It has continue to thrive in Nigeria despite the efforts, functional commitment and other seminal initiatives, to combat the menace.²⁰ One of the methods of recruiting victims of human trafficking is to subject them to voodoo ritual process in order to traffic them.²¹ Voodoo is the driving force in human trafficking and the voodoo ritual process is inherently traumatic.²² The use of voodoo in human trafficking plays a vital but nauseating role in the human trafficking business.²³ Immediately the traffickers are arrested in Nigeria, victims always fail to appear in court to testify against them for fear of the repercussion of death or illness that may come upon them or any member of their families when they break the oaths.²⁴ Voodoo is usually administered on a victim to ensure a victim's allegiance to the trafficker and it is also a means traffickers have at their disposal to guarantee a victim's obedience.²⁵

Voodoo administered on victims is a control mechanism in human trafficking to silence victims and trap them in debt bondage and this has been extremely effective in its implementation.²⁶ Victims are subjected to the oath prior to their departure from Nigeria to ensure debt commitment and non-

¹⁴*Ibid*, 565.

¹⁵C Osezua 'Transmogrified Religious System and Phenomenon of Sex Trafficking among the Benin people of Southern Nigeria' [2013] (2) (3) *The International Journal of Arts and Humanities (AFRREV IJAH)* 22.

¹⁶P A Anyebe, 'Voodoo and Human Trafficking in Nigeria: A Nation's Albatross' [2015] (3) (2) *Journal of Social Welfare and Human Rights*, 33-55.

¹⁷E Locano, 'Victims, Sex Workers and Perpetrators: Gray Areas in the Trafficking of Nigerian Women' [2014] (17) *Trends Organ Crime*, 110-128 <<https://doi.org/10.1007/s12117-014-9212-1>>accessed 5 July 2023.

¹⁸TIPPEA Act 2015, ss1 and 13(1) (2) (b).

¹⁹*Ibid*.

²⁰N H, Msuya 'Traditional "Juju Oath" and Human Trafficking in Nigeria: A Human Rights Perspective' [2019] (52) (1) *De Jure Law Journal*, 138-162 <<http://dx.doi.org/10.17159/2225-7160/2019/v52a9>>accessed 5 July 2023.

²¹*Ibid*

²²*Ibid*.

²³M Mojeed, 'Voodoo Aids Human Trafficking' <<https://documentation.lastradainternational.org/doc-center/2066/nigeria-voodoo-aids-human-trafficking>>accessed 5 July 2023.

²⁴*Ibid*.

²⁵EASO Nigeria, 'Trafficking in Human Beings Country of Origin Information Report A'. <<https://reliefweb.int/report/nigeria/easo-nigeria-trafficking-human-beings-country-origin-information-report-april-2021>>accessed 5 July 2023.

²⁶EASO Nigeria (n 25)

disclosure of the identity of the traffickers in the country of origin when the victims reach their destination country.²⁷ However, in the event of non-compliance and violation of the oath by the victims, illness and untimely death may befall the victim and members of their family.²⁸

The NAPTIP also attributes its difficulty of the Agency to prosecute traffickers to the use of voodoo in human trafficking.²⁹ Victims are usually taken to shrines and made to take oaths of secrecy before they leave the country of origin and immediately they arrive the destination country, they are also usually subjected to another round of oath-taking. The oath prevents them from testifying against their traffickers in court and also revealing their identities.³⁰ According to the NAPTIP about 90 per cent of girls that are being trafficked to Europe are taken to voodoo shrines to take “oaths of secrecy.”³¹ Victims are instructed to say after the voodoo priest that they are beneficiaries of traffickers’ kindness and that they invite relevant deities to visit them with evils such as, sickness, misfortune, death on them or their family members if they reveal the identities traffickers to law enforcement agencies at destination countries.³² The present strength of voodoo ritual process is associated to the well-rooted African belief that the body is not only physical but is also part of the spirit world. This means that, the body can be subjugated and possessed by shadows and spirits. The evocation of the presence of the gods during the voodoo ritual process depicts that the two contracting parties (victim and the trafficker) should respect their vows in the physical and spiritual realms.³³ Symbols of oath taken from victims are labeled and deposited in the shrines as points of contacts in case they break the oath taken at the voodoo shrine before the voodoo priest.³⁴

The NAPTIP has given examples of several incidents where the use of voodoo has been administered on victims of human trafficking. For example, there was also a case of an investigative journalist, Jenny Kleeman, with respect to voodoo who reported a documentary on what she called ‘black magic’ used to exploit thousands of Nigerian women in sex slavery.³⁵ Another case by NAPTIP is the case involving *AGF v Sarah Okoya*,³⁶ the first conviction secured by NAPTIP in 2004 where the defendant who was charged with trafficking six (6) girls to Spain for prostitution. The victims refused to show up in court to testify, virtually bringing the trial to a halt, due to their fear of the potency of the voodoo administered on the victim during the voodoo ritual process. However, NAPTIP was finally able to secure the conviction of Sarah Okoya because it then successfully raided the shrine of the voodoo priest who administered the oath. The voodoo Priest was compelled to testify against the trafficker, and this resulted to her conviction. The accused person pleaded guilty to the charge and was convicted and sentenced to 12 months imprisonment without an option of fine.

²⁷*Ibid.*

²⁸*Ibid.*

²⁹*Ibid.*

³⁰*Ibid.*

³¹Anyebe (n 16)

³²*Ibid.*

³³Locano (n 17).

³⁴*Ibid.*

³⁵M Ikeora, ‘The Role of African Traditional Religion and “Juju” in Human Trafficking: Implications for Anti-Trafficking’ [2016] (17(1) *Journal of International Women’s Studies*, 1-16; ‘Unreported World -Nigeria: Sex, Lies and Black Magic’, Broadcast on UK television’s Channel Four.

³⁶Suit NO. B/15/15c/2004. (High Court of Edo State, Benin City. Unreported). Judgment delivered on 19 November, 2004.

In a similar case involving one *AGF v Constance Omoruyi*³⁷ two victims were procured by the accused person who organised foreign travel for them for prostitution. The victims also failed to testify and conviction was only secured because the voodoo priest who administered the oath testified against the trafficker in court. The accused person was convicted and sentenced to 1-year imprisonment with a fine of #50,000. In this case, the intended exploitation never transpired and a threat was used by the defendant that some might qualify as seemingly irrational. The court, however, viewed the threat as serious enough to result in an intimidation of the victims. The case is also of interest in that the victims did not testify, and yet the prosecution was able to prove its case by means of the defendant's confessional statements, the testimony of a native doctor and the testimony of a law enforcement officer. The defendant was found guilty of an attempt to organize foreign travel for prostitution and an attempt to place the victims in servitude as pledge for a debt.

In this case the victims, young women, were required to go to a native doctor and participate in a voodoo ceremony that bound them to the defendant in providing sexual services to clients abroad. During the voodoo ceremony the victims were obliged to swear to an oath which required them to pledge, under threat of a curse of death, not to run away and to pay the defendant's money.³⁸ The voodoo priest confirmed the victims' understanding that they would be going to Italy to engage in prostitution. After this oath the voodoo priest requested for the victims' pubic hairs, fingernails, panties, and kept them in wraps with the victims' names on them. The kind of evidence in this case include testimony from law enforcement and from a so-called native doctor, the defendant's confessional statements made during the investigation, and documentary and real evidence.

In addition, a Nigerian who is a UK London-based nurse Josephine Iyamu who used voodoo on victims was jailed for trafficking Nigerian women into Germany to work as prostitutes after subjecting them to "voodoo" rituals. Josephine Iyamu forced the five women to swear oaths. The women were made to undergo a black magic ritual known as "voodoo", in which they pledged not to run away or inform police. During the ceremony - performed by a voodoo priest - the women were made to drink blood mixed with worms, eat a chicken heart and had black soot rubbed inside fresh wounds. With zero regard for their safety and wellbeing, Iyamu sent them via dangerous routes to Germany and forced them to work in brothels to fund her own lavish lifestyle, Iyamu was arrested as she flew into London in August after police were tipped off by a brothel owner in Germany, who suspected one of the women was on a fake passport. Britain passed tough anti-slavery legislation in 2015 introducing life sentences for traffickers and allowed for British nationals to be tried for human trafficking offences regardless of where they took place Iyamu, 51, formerly of Bermondsey, was convicted of arranging or facilitating travel for sexual exploitation and perverting the course of justice. She was jailed for 14 years in 2018 at Birmingham Crown Court. Iyamu became the first British national prosecuted for Modern Slavery Act offences after trafficking victims outside the UK. Following an appeal, her sentence was increased to 18 years two months later.³⁹ The case marked the first successful prosecution of a Briton for slavery

³⁷Unreported. Charge No: B/31c/2004 (High Court of Edo State, Benin Judicial Division). Judgment was delivered on 22/9/2006).

³⁸ *Ibid.*

³⁹Sahara Reporters, 'Human Trafficking: Nigerian 'Voodoo 'Politician in United Kingdom Jailed, Ordered to Hand over N100 million Illicit Earnings' < <https://saharareporters.com/2022/03/24/human-trafficking-nigerian-%E2%80%98voodoo%E2%80%99-politician-uk-jail-ordered-hand-over-n100million>> accessed 10 July 2023.

offences committed outside the country and was a test of the country's tough anti-trafficking laws, passed in 2015 to crack down on the modern human slave trade.

In Netherlands multiple cases have been discovered where traffickers use voodoo as a means to control their victims. In 2012, Netherlands, had one of the largest cases known as the Koolvis case that involved over 120 victims.⁴⁰ The Dutch court convicted traffickers who were bringing women from West Africa to Europe for commercial sexual exploitation. Generally, it is common in human trafficking cases for victims to have a fear of testifying against their traffickers, but in this particular case, it was compounded by a fear of breaking a voodoo oath which almost protected the gang of traffickers from a conviction. But for the law enforcement agency who in the effort of doing their work very well and achieving success engaged the help of a local Nigerian priest that they could make the victims feel free of their curse and comfortable enough to talk to the police and help convict their traffickers.⁴¹

3.0 Other Control Mechanisms used by Traffickers in the Fight against Human Trafficking

Here, the other control mechanisms used by traffickers in the fight against human trafficking includes but not limited to: witchcraft, oath-taking, coercion and threat, coercion and deception. These control mechanisms will be discussed hereunder in details.

3.1 Witchcraft

The relationship between, witchcraft and human trafficking has featured in many trafficking cases, especially from Nigeria.⁴² Witchcraft is not expressly stated in the (TIPPEA) 2015⁴³ but impliedly mentioned with the use of words like 'threat 'intimidation', 'force', 'coercion' deception in TIPPEA.⁴⁴ Witchcraft is regularly used by traffickers in human trafficking to exert pressure over the victims.⁴⁵ The use of witchcraft is a form of mental coercion aim to capture the victims of human trafficking to do something which ordinarily they would not have done. In Africa, witchcraft is generally known to as voodoo and Juju (swearing an oath to a deity or supernatural object for protection or punishment).⁴⁶ Voodoo is a form of witchcraft existing alongside traditional belief,⁴⁷ witchcraft beliefs have existed for centuries and still existing in Nigeria.⁴⁸ For centuries, Nigerians lived close to Mother Nature and saw the natural environment as something controlled by spiritual forces.⁴⁹

⁴⁰M Villemain, 'West African Voodoo: A Technique for Control by Human Traffickers' <<http://humantraffickingsearch.org/wp-content/uploads/2017/06/West-African-Voodoo-A-technique-for-control-by-human-traffickers.pdf>>accessed 13 July 2023.

⁴¹*Ibid.*

⁴²M Ikeora, 'The Role of African Traditional Religion and Juju in Human Trafficking: Implications for Anti Trafficking' [2016] (17) (1) *Journal of International Women Studies*, 1-18.

⁴³TIPPEAA 2015.

⁴⁴TIPPEAA 2015, s82.

⁴⁵Myria (n 2).

⁴⁶L E Nagle and B Owasonoye, 'Fearing the Dark: The Use of Witchcraft to Control Human Trafficking Victims and Sustain Vulnerability' [2016](45) *South-western Law Review*, 562-593

⁴⁷O J Agbeyegbe, 'Finding a voice: From Africa to Europe the Effect of Voodoo Secrecy Oath Sworn by Victims of Sex Trafficking ' at International Human Trafficking and Social Justice Conference September 2018, held at Toledo Ohio

⁴⁸F A Eboiyebi, 'Convicted without Evidence: Elderly Women and Witchcraft Accusations in Contemporary Nigeria' [2017] (18) (4) *Journal of International Women Studies*, 246-265< <http://vc.bridgew.edu/jiws/vol18/iss4/18>>accessed 15 July 2023.

⁴⁹*Ibid.*

According to Fancello, "whatever the background, the discourse on witchcraft is always reality of social life and human relations, including in the urban setting of contemporary African societies, often intrinsically linked to 'the village', considered as the home of witchcraft".⁵⁰Witchcraft fantasy transcends different religious beliefs. To differentiate witchcraft from the other belief systems mentioned, it is worth remembering that, by their very nature, deities are called upon to preserve and save human life, whereas witchcraft may be invoked for the purpose of sanction and punishment.⁵¹ Witchcraft beliefs are complicated by the fear of occult, persistent poverty, desolation, and insecurities. The underlying causes of a belief in witchcraft are complex and cannot simply be ascribed to just one origin. The fall in standard of education and a high degree of religious indoctrination play their part in the belief of witchcraft.⁵² Witchcraft is becoming increasingly linked to a modern form of slavery and it has continue to make human trafficking in Nigeria to thrive.⁵³

The use of witchcraft not only put the victims in perpetual bondage, but it also makes it incredibly very hard to detain, prosecute and arrest the traffickers.⁵⁴ The gripping fear of retaliation resulting from the oaths victims were forced to take and the abuse they endured during their capture, makes it almost impossible for victims to trust their rescuers and identify their captors.⁵⁵ Victims often feel unable to testify against alleged traffickers, due to the fear that they will have broken an oath and invited misfortune into their lives.⁵⁶Through ritual "oaths of protection", witchcraft provides an easy way to traffic victims and mentally dominate them, who are easily silenced with the threat that any disobedience will be punished by the spiritual world. This has left the phenomenon of witchcraft hard to detect. Some beliefs in witchcraft in Nigeria are particularly related to the trafficking of children, especially street children, who form the largest proportion of the people who are trafficked from Nigeria.⁵⁷Street children are often accused of witchcraft, which makes them one of the most vulnerable groups to human trafficking in Nigeria. The street children end up living on the streets after being abandoned by their families, having been accused of being witches.⁵⁸

The relationship between witchcraft and human trafficking, particularly in Nigeria is becoming increasingly obvious.⁵⁹ The bond between witchcraft and human trafficking is not spiritual but economic, whereas traffickers takes advantage of victims' strong spiritual beliefs to make money. Human trafficking is a modern form of slavery that often entails physical, psychological and sexual abuse. Psychological abuse can be linked to the superstitious beliefs of victims that are imbued in their

⁵⁰É Apard and Others, 'IFRA Nigeria, Religious, Social and Criminal Groups in Trafficking Nigerian Girls and Women: The case of Shrines Lasis Club and Cultist Group', 1-181. < <https://hal.archives-ouvertes.fr/hal-03337293/document>>accessed 15 July 2023.

⁵¹*Ibid.*

⁵²Eboiyebi (n 48).

⁵³E W,Harrop, 'Africa a Bewitching Economy: Witchcraft and Human Trafficking'< <https://allafrica.com/stories/201209181007.html>>accessed 15 July, 2023.

⁵⁴In On Africa (IOA), When the Occult Meets the Criminal: The Connection between Human Trafficking and Witchcraft<<https://www.polity.org.za/article/when-the-occult-meets-the-criminal-the-connection-between-human-trafficking-and-witchcraft-2012-11-16>>accessed 15 July 2023.

⁵⁵In On Africa (IOA) (n 54).

⁵⁶*Ibid.*

⁵⁷N H,Msuya, 'Tradition and Culture in Africa: Practices that Facilitate Trafficking of Woman and Children' [2017] (20)(1) *Dignity: A Journal of Analysis of Exploitation and Violence*, 1-36.

⁵⁸*Ibid.*

⁵⁹*Ibid.*

psyches as members of a certain society, community or culture.⁶⁰ Traffickers capitalise on both religious/superstitious beliefs such as voodoo, witch craft .oath-taking “faith” of the victims, and their ignorance, especially when the victims come from places where spiritual ideas are very strong.⁶¹ Witchcraft occurs as result of the impact of superstition belief which outweighs the logic of education. The poverty in the country, corruption of the government, lack of job opportunities, lack of good health care facilities and no opportunities for improving their lives only compounds the problem of human trafficking.⁶² Nigeria is an example of how human trafficking and witchcraft have become intertwined both as a source and destination country.⁶³ The case of witchcraft was evident in the case of *In the case of R v Anthony Harrison* ⁶⁴the victims were two minor females from Nigeria who were subjected to “juju” ceremonies to terrify them into obedience, silence and ensure that they pay their “debt”. The prosecution enlisted the expertise of an anthropologist with a specific knowledge of Nigeria and witchcraft practices. Evidence given by this witness enabled the jury to better understand the circumstances of the case and why the victims’ evidence had been given piecemeal and, was, on the face of it, inconsistent. The use of the expert also assisted the jury to understand the complex relationships between the trafficker and the victims as well as the cultural context which is the voodoo that aids human trafficking. The defendant was convicted of conspiracy to traffic two victims for sexual exploitation and other charges and sentenced to 20 years imprisonment.

3.2 Oath–Taking

In oath -taking, deities and ancestors are called to be witnesses to the agreement.⁶⁵ The oath is a fearful ritual, and during rituals; words connoting calamity, sickness, insanity and death are used to make a pledge, stating that a person will keep to one’s part of agreement.⁶⁶Oaths commonly called juju by traffickers in Nigerian human trafficking is used as a tool of coercion to control the victims of human trafficking. ⁶⁷An oath works as a form of psychological control as the fear of consequences of breaking the oath can lead to death severe illness of the victim or the victim’s family.⁶⁸ The justification for oath is to prevent victims from revealing the identity of the traffickers or the details of the voodoo ritual and to ensure victims pay their debt as agreed. Without creating any difficulty. Traffickers pledge to take the victim to the destination. ⁶⁹ Many traffickers require their victims to swear to an oath when they want to begin the process of trafficking to make the victim to be obedient and loyal throughout the process. In an agreement to take the oath by the trafficked person as instructed by the trafficker through voodoo priest. It is believed that if the trafficked persons swears to an oath and eventually breaks it, the

⁶⁰*Ibid.*

⁶¹*Ibid.*

⁶²*Ibid.*

⁶³*Ibid.*

⁶⁴(T20117086), 7 July 2011 (Judgment of the Crown Court, unreported), United Kingdom.

⁶⁵A E Nana , ‘African Traditional Religion Oath Taking and Resource Management in Nigeria’ [2020](12)(1) *Journal of Religion and Human Relations* 201-215,<
<https://www.ajol.info/index.php/jrhr/article/view/197458>>accessed 20 July 2023.

⁶⁶*Ibid.*

⁶⁷United Kingdom Home office, Country information and Guidance Nigeria: Trafficking of Women August 2016, Version 1.0< <https://www.refworld.org/docid/57b710594.html>>accessed 20 July 2023.

⁶⁸*Ibid.*

⁶⁹*Ibid*

breaking of the oath can anger the deities and this may lead to severe ailment, mental -illness or death of the oath breaker or their relatives.⁷⁰

Oath-taking, is now documented in national and regional policy addressing human trafficking within the Nigerian perspective.⁷¹ It is generally common amongst the Ibos, Edos, Yorubas and many other ethnic groups in Nigeria. Hence, oath-taking is a common feature of resolving dispute in Nigeria and many African countries.⁷² Oath-taking is part of the recruitment process of human trafficking which serves as an agreement between traffickers and their victims involving multiple rituals.⁷³ The act of oath-taking in these shrines is deeply rooted in the belief system of victims. As a result, Nigerian traffickers are capable of using the belief system on victims as a control mechanism to keep their victims in servitude.⁷⁴

Oath-taking is a tolerable practice and a common feature of the customary law resolution of disputes in certain parts of Africa.⁷⁵ Oath-taking is a religious and judicial system of swearing in the name of a god or goddess, happening either before or at the shrine of a dreaded divinity.⁷⁶ The act of oath-taking ritual takes place in the source country, with some ritual process performed on the victims.⁷⁷ Oath taking starts in human trafficking when the victim is instructed to undress, which puts fear in the victim.⁷⁸ A soot is prepared by the voodoo priest and the priest thereafter calls upon a spirit, aligned with the evil god Eshu, to enter the soot.⁷⁹ Numerous cuts with a razor blade all over the victim's body by the voodoo priest, and the priest rubs the soot purportedly containing the spirit, into the open wounds.⁸⁰ It is believed that in this way the spirit enters the victim's body and she can never escape from the spirit. The voodoo priest performs the ritual during the ritual process is to enable the victim to be loyal to the trafficker. While standing at the effigy of the god, Eshu, the victim is instructed to repeat the words that the priest dictates.⁸¹ The victim must swear that she will pay back the 'incurred' debt owed to the trafficker or 'madam' and that he or she will never disclose the identity of the traffickers⁸²

⁷⁰United Kingdom Home office(n 67).

⁷¹R Wilson, 'The Role of Oath -Taking in Human Trafficking: Experiences of Survivor' (Unpublished Ph.D. Thesis, University of Hertfordshire 2021)27.

⁷²E O Ekhaton, 'Traditional Oath -taking as an Anti-Corruption Strategy in Nigeria' In A Akogwu (ed.) *Combating the Menace of Corruption in Nigeria: A Multidisciplinary Conversation* (Black Tower Publishers)309-336.

⁷³M Ikeora, 'Understanding [Anti] Human Trafficking in Nigeria: The Role of African Traditional Religion and Juju', Conference Presentation Paper Held in Zurich 2016.

⁷⁴*Ibid.*

⁷⁵*Ibid.*

⁷⁶*Ibid.*

⁷⁷*Ibid*

⁷⁸M Van der Watt & B Kruger, 'Exploring 'juju' and Human Trafficking: Towards a Demystified Perspective and Response' *South African Review of Sociology*, 48:2, 70-86, DOI: 10.1080/21528586.2016.1222913, juju ceremony. <http://www.antitraffickingconsultants.co.uk/JuJu_Ceremony.pdf>accessed 15 May 2023.

⁷⁹*Ibid.*

⁸⁰*Ibid* ; C.S Baarda, 'Human Trafficking for Sexual Exploitation from Nigeria into Western Europe: The Role of Voodoo Rituals in the Functioning of a Criminal Network '[2016] (13) (2) *European Journal of Criminology* 257-273.

⁸¹M Van der Watt and Bea Kruger; Anti-trafficking Consultants, 'Juju ceremony'. <<http://www.antitraffickingconsultants.co.uk/juju-ceremony/>> accessed 20 July 2023, 2023.

⁸²E Aghatise, ' Trafficking for Prostitution in Italy: Possible Effects of Government Proposals for Legalisation of Brothels' <<https://journals.sagepub.com/doi/10.1177/1077801204268608.co.uk/juju> >accessed 3 January 2023 ; A A Aronowitz . *Human trafficking, human misery – The global Trade in Human Beings*. London: Praeger; S Kara, *Sex trafficking: Inside the business of modern slavery*. (New York: Columbia University Press 2009).

There are four main participants in the ceremony of the oath taking: they include the officiant, the audience, the recipient of the oath (who can also be regarded as a "swearee") and a swearer.⁸³ The officiant is the person who has been referred to as the "voodoo priest", the "witch doctor" or the "juju priest". The audience consists of different people such as family members of the person taking the oath or other people migrating with the person swearing and who are mutual witnesses of their respective commitments. The audience play a more passive role than the officiant, they are generally silent spectators who are part of the community or represent the community. They make the oath sworn before them a public act, this dimension is believed to be of very importance because of the content of the oath. The trafficker ensures that one of relatives of the trafficked persons be contacted and should be in attendance, and they will all go to the shrine to take part in the ceremony before the "voodoo priest". The recipient of the oath can be either the "madam" herself, the mother of the "madam", or the trolley who are all regarded as the traffickers who are part of the trafficking network. The trolley is the person who takes the girl to appear before the voodoo priest in relation to trafficking, who acts as an intermediary, since the commitment is made to the madam. Her absence is not a problem in itself. François Billacois argues that the absence of the swearee or recipient of the oath can sometimes give more weight to the oath.⁸⁴

The swearer is the person making the commitment who is of course the trafficked person who is going to migrate.⁸⁵ The trafficked person is sometimes asked to wear a particular piece of fabric. During the oath-taking. The oath taking reveals that the relationship between the person making the commitment and its recipient as part of a context of inequality between the two protagonists, making it possible to create a bond of submission and obedience that goes beyond the mere content of the promise.⁸⁶ This inequality is linked firstly to the fact that the trafficker is of advanced age than the one who is exploited by her and has economic superiority.⁸⁷ The expression "oath of taking" also evokes the idea of reciprocal obligations, and in particular a duty to protect the person to whom allegiance is sworn. This idea of reciprocity is not found when a loyalty oath is used.⁸⁸

The simultaneous attendance of several trafficked persons during the oath taking is also important. This simultaneous attendance of several trafficked persons help to create a special bond between all the swearers. The way in which the oath itself is arranged provide a clear indication of what is at stake. The relationship created between the swearer and the swearee is based on a promise, a pronouncement on an object or substance on which one swears.⁸⁹ The link between the human trafficking and oath taking, from all indications stems from exploiting a 'malleable' system (juju) already structured in the society with the intention of making profit.⁹⁰ The trafficker takes the advantage of the malleability of juju as

⁸³Apard and Others, (n 50).

⁸⁴*Ibid*, 66.

⁸⁵*Ibid*.

⁸⁶Apard and Others (n 50).

⁸⁷*Ibid*, 67.

⁸⁸*Ibid*.

⁸⁹*Ibid*.

⁹⁰C Olufade, 'Sustenance of Sex Trafficking in Edo State: The Combined Effect of Oath taking, Transnational Silence and Migration Imaginaries on Trafficked women in Edo State' <<https://hal.archives-ouvertes.fr/hal-03313374>> accessed 20 July 2023.

they can utilise it as they so please.⁹¹ Traffickers ensure that victims of human trafficking who pass through them go through the oath taking ritual as one of the means of safeguarding their source of income, while at the same time, for some of these traffickers, protecting the victim of human trafficking with the same juju, to help them through the risk of the journey across from the source country to destination country.⁹²

The oath ceremony has been reported as being one of the powerful means, which is used to control human trafficking victims.⁹³ It reaches to the depths of their psychological vulnerability, combined with other push/pull factors which render victims vulnerable to being trafficked. Most victims of human trafficking are recruited from rural areas, specifically Nigeria's southern regions, with a few of them being from urban areas.⁹⁴ Data called for from 29 countries indicate that Nigerian traffickers exploit most of the victims from Nigeria.⁹⁵ Victims of trafficking are subject to a popular juju oath ceremony with a priest who is referred to as "voodoo priest" before departure for their work abroad.⁹⁶ Oath taking ceremony involve spiritual power which depicts that the individual cannot escape the threatened consequences of violating the oath simply by 'running away' from the trafficker.⁹⁷

Under Customary law in Nigeria oath taking is one of the methods of establishing the truth of a matter, known to customary law and accepted by both parties.⁹⁸ The legal validity of oath-taking has been acknowledged in several customary arbitration cases, including those of *Charles Ume v. Godfrey Okoronkwo*⁹⁹ & *Anor* and in *Ofomata & ors v. Anoka*.¹⁰⁰ According to Agbakoba: Oath-taking is a recognised and accepted form of proof existing in certain customary judicature. Oaths may be sworn extra-judicial but as a mode of judicial proof, its esoteric and reverential feature, the solemnity of the choice of an oath by the disputants and imminent evil visitation to the oath breaker if he swore falsely, are the deterrent sanctions of this form of customary judicial process which commends it alike to rural and urban indigenous courts. It is therefore my view that the decision to swear an oath is not illegal although it may be obnoxious to Christian ethics.¹⁰¹ The swearing to oath was evident in the case of *Attorney General of Federation v Franca Edith Asiboja*.¹⁰² Franca Asiboja, was jailed for seven years for trafficking young girls to Burkina Faso for prostitution, it came to light in court that Asiboja had compelled her victims to take oaths of secrecy before a shrine called Ogoje controlled by an old priestess. For the five months that they prostituted in Ouagadougou, before they were arrested by security agencies and repatriated to Nigeria, each of the girls reportedly paid 500,000 CFA to Asiboja in daily remittances. In order to earn their freedom. When they arrived at Burkina Faso, she received them and introduced them into work as prostitutes.

⁹¹*Ibid*

⁹²*Ibid*.

⁹³Msuya (n 20).

⁹⁴Msuya (n 20).

⁹⁵*Ibid*

⁹⁶*Ibid*

⁹⁷Wilson (n71) 28.

⁹⁸*Ojibah v Ojibah* (1991)5 NWLR (Pt.191) 296; *Oline v Obodo* (1958) SCNLR 298.

⁹⁹(1996) 12 SCNJ 404

¹⁰⁰(1974) 4 ECSLR 51

¹⁰¹I Oraegbunam, 'The Principles and Practice of Justice in Traditional Igbo Jurisprudence' [2009] (6) *Journal of African Studies* 53-75< <https://www.ajol.info/index.php/og/article/view/52335>>accessed 22 July 2023.

¹⁰²Charge No: B/BIC/05.

She received and controlled the earnings of the girls and kept a record of their payments to her. The victims could not move freely as they had no travel documents. This case affects the freedom of movement of the victims because they could not freely move about because of lack of documents. It makes the court convict the trafficker for seven years.

The particular dynamics of Nigerian networks should be considered in the preparation and development of a trafficking prosecution.¹⁰³ The UNODC recommends that consent-related issues should be addressed early on in the trial in order to provide the court with a framework within which to understand the vulnerability, inconsistencies in testimony and apparent consent of the victims to their exploitation. During trial in court while examining the witnesses, the presentation of physical evidence, such as remnants of rituals, or telephone communication relating to juju threats, gives judges greater evidence upon which to adopt a sound Judgment.¹⁰⁴ In at least two cases in the UK, the intervention of experts on sub-Saharan spiritual beliefs was essential both for contextualising the behaviour of the victims and for explaining the cultural aspects linked to the cases. Psychologists are also increasingly providing expert evidence on how oaths become a mechanism of control in human trafficking that intensely influences victims' behavior.¹⁰⁵

With respect to judicial deliberation of oath by the court in Nigeria, there are lots of discrepancies ascribed to oaths by law enforcement agencies and how it is mirrored in court. Judgments.¹⁰⁶ In instances where oaths and juju are mentioned in court decisions it is mainly in the description of the facts, not in the justification of the sentence. There are also many inexactness in references to the oaths, one of the inexactness is to underestimate these beliefs as superstitions or to consider them as backward and brainwashing. They are not backward, superstitious or brain washing because both the traffickers and the victims believe in voodoo, The traffickers make a lot of money from it and the victims believes the voodoo makes them to live a better life. Comments like these serve to discredit these beliefs without adding any value to the judicial reasoning. There is also a lack of knowledge of the prevalence of religious syncretism in sub-Saharan societies, and some judges assert that a woman who declares herself Christian cannot feel coerced by ritual oaths. Tribunals have also assumed that victims with a certain level of education cannot believe in the power of the oaths. The courts ignore the fact that such ceremonies may create a situation of fear or psychological distress, even in those with weaker or no faith.¹⁰⁷

There is a lack of understanding by the role played by oaths in human trafficking. Some judges claim that the traffickers' objective is that women never repay their debt. However, the effectiveness of ritual oaths is based on the fact that it is feasible for the debt to be paid – by repaying what they owe, women can avoid the dire consequences. In this way the ritual oaths are very effective at binding the victim

¹⁰³A Gracia, ' Trafficking, Ritual Oaths and Criminal Investigations' <<https://www.ajol.info/index.php/og/article/download/52335/40960>>accessed 22 July 2023

¹⁰⁴*Ibid.*

¹⁰⁵*Ibid.*

¹⁰⁶*Ibid.*

¹⁰⁷Gracia (n 103).

to their traffickers.¹⁰⁸ Traffickers instrumentalise the oath to reinforce feelings of submission, secrecy and loyalty, seeking to prevent the victim breaking away from them for as long as possible.¹⁰⁹

3.3 Coercion and Threat

Coercion has emerged as a significant source of analytic concern in human trafficking.¹¹⁰ Coercion is expressly codified¹¹¹ as a fundamental legal element in human-trafficking crimes. Coercion is known to be a dominant feature of human trafficking.¹¹² It includes threats of serious harm to or physical restraint against any person, psychological manipulation, document confiscation, and shame and fear-inducing threats to share information or pictures with others or report to authorities.¹¹³ Coercion often involves the manipulation of a coerced person's alternatives to achieve his or her compliance.¹¹⁴

The definition of human trafficking by the Palermo Protocol¹¹⁵ comprises three different elements: an action; a means by which that action occurs or is made possible; and a purpose to the action, which is specified as exploitation. States parties must then use this definition to criminalise human trafficking in their domestic law.¹¹⁶ Nigeria as a state party and signatory to the Palermo Protocol has adopted the definition which is evident in the definition section of the TIPPEAA 2015.¹¹⁷ The first element of the definition, which is the “action” element, is one part (and in the case of trafficking in children, the only part) of the definition that will constitute the *actus reus* of human trafficking. This element can be fulfilled by a variety of activities including but not limited to the undefined practices of recruitment, transportation, transfer, harbouring or receipt of persons.¹¹⁸ The second element of the *actus reus* of human trafficking, which is the means element (threat or use of force or other forms of coercion, abduction, fraud, deception, *abuse of power* or of a position of vulnerability, and the giving or receiving of payments or benefits to achieve consent of a person having control over another person) is particular to human trafficking in adults only.¹¹⁹ This aspect of the definition confirms the position already reflected in earlier treaties on the subject that individuals can end up in a situation of exploitation through indirect methods such as deception and fraud as well as by physical force. Coercion is an umbrella term, in the human trafficking context to refer to a range of behaviours including violence, threats and deceit, as well as abuse of a position of vulnerability.

The final element of the definition, “for the purpose of exploitation” introduces a *mens rea* requirement into the definition. Human trafficking will occur if the implicated individual or entity intended that the

¹⁰⁸*Ibid.*

¹⁰⁹*Ibid.*

¹¹⁰K Kim, ‘The Coercion of Trafficked Workers’ [2011] (96) *Iowa Law Review* 409-472.

¹¹¹*Ibid.*; TIPPEAA 2015, s82; Palermo Protocol, Art, 3(a).

¹¹²C J Dando and Others, Perception of Psychological Coercion and Human Trafficking in the Mid –West lands of England: Beginning to know the Unknown< <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4858279/>>accessed 20 May 2023.

¹¹³Office of Trafficking in Persons, Fact sheet: Human Trafficking< <https://www.acf.hhs.gov/otip/fact-sheet/resource/fshumantrafficking>>accessed 3 May 2023.

¹¹⁴Kim (n 110).

¹¹⁵Palermo Protocol, art 3.

¹¹⁶UNODC (Vienna Issue Paper), ‘Abuse of Position of Vulnerability and Other Means within the Definition of Trafficking in Persons’<<https://www.unodc.org>>accessed 3 May 2023.

¹¹⁷TIPPEAA 2015,s 82.

¹¹⁸TIPPEAA2015, s 82.

¹¹⁹*Ibid.*

action which in the case of trafficking in adults must have occurred or been made possible through one of the stipulated means) would lead to exploitation.

The TIPPEAA criminalises all acts of trafficking in persons including the use of coercion over another person for the purposes of sexual exploitation¹²⁰. The offence of trafficking in persons on conviction attracts a term of not less than two less than two years and a fine of not less than N250,000.00.¹²¹ Section 3 of the VAPP Act prohibits the act of coercion,¹²² which is an element of human trafficking crime. It provides that a person who coerces another to engage in any act to the detriment of that other person, physical or psychological wellbeing, commits an offence and is liable on conviction to term of three (3) years imprisonment.¹²³ The use of the term or 'coercion' in the above section depicts how traffickers use threat and coercion by means of voodoo to instil fear in the mind of the victims. Voodoo and other control mechanisms play a major role in enslaving trafficked persons without making a distinction between all the supernatural forces involved in human trafficking. One of the major characteristic of traffickers is the use of threats of voodoo curses to control victims and coerced them into situations of prostitution.¹²⁴ Once arrangements for victims' trips abroad are completed, traffickers seal the deal by taking the victims to shrines where the voodoo priests administer oath on the victims.¹²⁵ It is also important to state that the voodoo ritual process by traffickers in human trafficking has elements of coercion and threat. The coercion aspect commences immediately the victim is brought before the juju priest to the shrine with the beating of drums, singing and enchantments.¹²⁶ The threat aspect occurs when traffickers tell the victims that if they do anything contrary they will invoke the spirit of voodoo. Which shall result in death, illness, misfortune to the victim and their families.¹²⁷

3.4 Coercion and Deception

Human trafficking takes place in every region of the world. Human beings are sold, bought and traded much like objects every day.¹²⁸ Victims of human trafficking end up in the hands of traffickers because they are being deceived, being forced or abducted.¹²⁹ A trafficker can coerce another person through fear, such as the fear of being returned to a war-torn home, being separated from loved ones, or losing immigration status.¹³⁰ A trafficker can deceive a person into being trafficked by telling her that a well-paid job and good working conditions or for a young person, a modelling contract or a singing career await, when in fact it is not true and she may be exploited for sex or labour.¹³¹ Young persons and children, especially, are more easily deceived because they are less aware of the risks of trafficking.¹³²

¹²⁰TIPPEAA 2015, s 13(1)(2)(a)

¹²¹TIPPEAA 2015, s 13(2) (c).

¹²²*Ibid.*

¹²³VAPP Act 2015, s 3.

¹²⁴TIPPEA Act 2015, ss1&13(1) (2) b.

¹²⁵Mojeed (n 23).

¹²⁶O J Agbeyegbe, 'Finding a voice: From Africa to Europe the effect of voodoo secrecy oath sworn by victims of sex Trafficking' at International Human Trafficking and Social Justice Conference September 2018, held at Toledo Ohio.

¹²⁷Mojeed (n 23).

¹²⁸UNCHR (Africa), Trafficking in Persons< <https://www.unhcr.org/human-trafficking.html>>accessed 25 July 2023.

¹²⁹*Ibid.*

¹³⁰British Columbia, Element 2: The means of Human trafficking and how it is done< <https://www2.gov.bc.ca/gov/content/justice/criminal-justice/victims-of-crime/human-trafficking/human-trafficking-training/module-1/element-2-means>>accessed 26 July, 2023.

¹³¹*Ibid*

¹³²*Ibid.*

Parents, too, though, can be deceived into letting their children go with traffickers if they believe their children are being offered a better life.¹³³

With respect to voodoo ritual process there is no transparency during the human trafficking process, including the oath swearing voodoo ritual ceremony.¹³⁴ There is element of deception and confusion regarding the nature of the ritual prior to attending, language during the ritual victims of human trafficking finds it very difficult to understand the things are said by voodoo priest, the nature of the work after leaving the origin country to destination country, the level of debt agreed to and the life awaiting them in the destination country.¹³⁵ Victims see oath taking during the voodoo ritual process as a positive step toward securing their transport to Europe. The debt amount is often stated in an incomprehensible foreign currency.¹³⁶ The Victims understanding of and relationship with the oath changes as the true circumstances become apparent¹³⁷

The definition of Trafficking in Persons Protocol¹³⁸ and under the TIPPEAA,¹³⁹ refers to “threats and use of force and other forms of coercion” clearly linking coercion with the threat and use of force, and potentially, signifying a separation between what are often seen to be the direct and less direct “means” by which individuals are moved into or maintained in situations of exploitation.¹⁴⁰ Part three of the TIPPEAA prohibits all acts of human trafficking by means of deception.¹⁴¹ Deception is one of examples of less direct means and relates to the nature of the promised work or service, and/or the conditions under which an individual is to undertake that work or perform that service. Deception takes place when traffickers deceive women, men and children from all corners of the world and force them into exploitative situations every day.¹⁴² The best-known form of human trafficking is for the purpose of sexual exploitation, hundreds of thousands of victims are trafficked for the purposes of forced labour, domestic servitude, child begging or the removal of their organs.¹⁴³ Traffickers play psychological games to deceive, defraud, manipulate, or threaten victims into providing exploitative labor or commercial sex. Coercion or abduction can play a role, most often victims are tricked through lies and promises of a better life.¹⁴⁴

4.0 Conclusion

This paper reveals that the act of human trafficking in Nigeria is currently high as a result of the voodoo phenomenon and other control mechanisms adopted by the traffickers to manipulate their victims to do their wish or command. Human trafficking has continued to thrive in Nigeria despite the efforts,

¹³³*Ibid.*

¹³⁴A C and Others, ‘Rituals as a Control Mechanisms in Human Trafficking; Systematic Review and Thematic Synthesis of Quality Literature’[2022]*Journal of Human Trafficking* 10-31

¹³⁵*Ibid.*

¹³⁶*Ibid.*

¹³⁷*Ibid.*

¹³⁸Palermo Protocol, Art 3(a).

¹³⁹TIPPEAA 2015,s 82.

¹⁴⁰UNODC (Vienna) (n 110).

¹⁴¹TIPPEAA 2015,s 13(2) (b).

¹⁴²Transnational Organised Crime: Human trafficking: People for Sale<<https://www.unodc.org/toc/en/crimes/human-trafficking.html>>accessed 26 July 2023.

¹⁴³*Ibid.*

¹⁴⁴Love Justice, ‘The Hidden Deceptions of Human Trafficking: A Personal Testimony’ <

<https://www.lovejustice.ngo/blog/the-hidden-deceptions-of-human-trafficking-a-personal-testimony>>accessed 26 July 2023.

functional commitment and other seminal initiatives, to combat the menace. The use of voodoo and other control mechanisms shall continue to thrive and escalate human trafficking in Nigeria if not brought under control. This paper recommends that to eradicate the continuous use of voodoo and other control mechanisms in human trafficking by traffickers, the government should make the punishment stricter by increasing the terms of imprisonment, remove the fines in our laws. If the terms of imprisonment carries higher terms of 12, 15 years to 20 years like what is obtainable in other jurisdictions like the United kingdom under the Modern Slavery Act of 2015 and the Dutch Criminal Code 1886 in Netherlands trafficking will be reduced .But if the court continues to give lower sentences like 1 year, 5 years and 7 years as stipulated under the TIPPEAA 2015 human trafficking shall continue to thrive and traffickers will have no fear of committing or indulging in the crime every time. In essence, there is still need for the Nigeria government to further amend the present TIPEAA Act 2015. The law enforcement agencies should try as much as possible as they have been doing arrest voodoo priest/priestess and prosecute them. NAPTIP should make efforts to making traditional chiefs and herbalist anti-trafficking ambassadors to stem the tide of the use of voodoo and other control Mechanisms of human trafficking in Nigeria. *This* would make some of voodoo priest/priestess them to know that assisting victims of trafficking through traditional means by the use of voodoo, witchcraft, oath –taking and other control mechanisms does more harm than good to the society and the country at large.