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CHALLENGES TO EFFECTIVE LAW ON REDUCTION OF YAHOO YAHOO CYBER CRIME AMONG TERTIARY INSTITUTIONS STUDENTS IN NIGERIA

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Abstract

Internet Fraud, also known as Yahoo Yahoo Cyber Crime has become an increasing bad phenomenon particularly among students in tertiary institutions in Nigeria with terrible consequences including serious financial loss, heart attack and psychosis to individual victims who suffer monumental financial loss, among others. In order to reduce the socio-economic consequences of the above, governments in Nigeria put up series of prohibitive law and equally sentenced many of the culprits into various terms of imprisonment. Despite the above, it is still observed that Yahoo Yahoo Cyber Crime activities continue to be on the increase. This study analyzes and identifies the challenges confronting effective use of various laws for the prosecution of Yahoo Yahoo Cyber Crime with the aim of achieving reduction in the crime in Nigeria. This paper is divided into segments which include; Introduction, Conceptual analysis on Cyber Crime, analysis of the legal Regime on Cyber Crime control, the challenges to effective law on control of Cyber Crime and the way forward.

Keywords: Challenges, Effective law, Yahoo Yahoo Cyber Crime, Tertiary institution students.

1. Introduction

Internet Financial Fraud also known as Yahoo Yahoo cybercrime has become an increasing online activity that involves fraudulent or dishonest behaviour for the purpose of financial gain.[1] Yahoo Yahoo cybercrime involves the use of internet service or software with internet service to take advantage and defraud victims of huge sum of money on regular basis through various methods like website prank, sham identity, high test disaster fraud and card fraud.[2]

There has been a noticeable increase in Yahoo Yahoo cybercrime activities particularly among students in tertiary institutions in Nigeria with terrible financial consequences on Nigeria. In 2007, an estimated financial loss from cyber fraud was ₦250 billion, while about ₦288 billion was lost in 2018.[3] Apart from this, it is observed that Yahoo Yahoo Cyber attack has subjected victims to developing health issues such as heart attack and different degrees of psychosis due to monumental financial loss and the use of spiritual power by Yahoo Yahoo operators. In addition to encouraging the feeling of distrust among victims of Yahoo Yahoo towards any individuals, the loss of value for human life is also involved as part of the terrible consequences of Cyber crime, due to the fact that Yahoo boys commit ritual killings to enhance success of their Yahoo Yahoo activities.[4]

In order to combat the above menace, relevant legal and security measures put in place by the government of Nigeria for controlling increase in Yahoo Yahoo activities include the Constitution of Federal Republic of Nigeria 1999 (as amended),[5] the Economic and Financial Crimes

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[1]Pauline c. Reich, J.D, M.A 'Cyber crime and advance fee scams in country and across border' Conference paper in crime in Australia , International connections, Australian institute of criminology, International conference hold in November 29, 2005 at Hilton on the park Melbourne, Australia.

[2]For samples of scam and unsolicited letter of invitation see <http://www.crimes-of-persuation.com/crime/business/nigeria.html>

[3]O Aimee, 'Terrifying Cyber Crime and Cyber Security Statistics and Trends', <http://www.comparitech.com/vpm/cybersecurity-cybercrime-statistic-facts-trends/#Global2018>

[4]O Tade, 'A Spiritual Dimension to Cybercrime in Nigeria. The yahoo plus phenomenon. *Human Affairs Journal* (2018) 23, 687.

[5] CFRN, s 15(5).

Commission Act 2015 (EFCC Act). The Independent and Corrupt practices Commission Act (ICPC Act), the Criminal Code Act and others.[6] The Central Bank of Nigeria also introduced a risk based cyber security framework as a measure for ensuring an enduring control on Cyber crime activities in Nigeria.

Despite all the above, it is observed that the infamous activities of Yahoo boys have continued even on a larger scale in Nigeria. Cyber financial crime or Yahoo Yahoo is now embraced among large number of youthful Nigerian students as a necessary means of getting rich fast in Nigeria. Attesting to the above, the Economic and Financial Crime Commission (EFCC) has made it known to Nigerians that about seventy percent (70%) of youthful Nigerians students risk the chance of becoming potential convicts if the present high rate of involvement of Nigerian youth in tertiary institutions in cyber fraud is not stopped. Buttressing the above, the Ilorin Zonal Command Office of Economic and Financial Crime Commission has several times spoken in 2021 to decry high rate of cyber fraud in Nigeria and to discourage youth from committing cyber fraud.[7] Also, in Nigeria, it is further observed that Yahoo Yahoo cybercrime has continued to grow without bounds winning more followership from Nigerian youth and partner agencies like internet companies who also contribute to successful execution of internet fraud through supply of internet and computer services.

Giving further reports on the increasing influence of Yahoo Yahoo cybercrime activities, the Economic and Financial Crime Commission (EFCC) explained that a lot of undergraduates in Nigerian universities have accepted the practice of internet fraud as a way of life for enriching themselves. The EFCC has also reported that more than 288 persons have been convicted over various cyber frauds while 234 people are still being prosecuted in courts across Nigeria.[8] In 2021, it was reported that Kwara State University (KWASU) expelled about 90 students majorly on the offence of Yahoo Yahoo cybercrime, while Adigun Oladele, a final year student of University of Ilorin was sentenced to one year imprisonment for internet fraud. The frequency of committing Yahoo Yahoo cybercrime is so much that it was reported that no week ever passed without hearing news about students being paraded in court for cyber fraud offences in Nigeria. There was also the case of Rahmon Olorunwa Abbas also known as Hush Puppy, a frontline Nigerian Yahoo boy who was extradited to United States of America for jail term on the account of cyber fraud offences. On the report of convictions for Yahoo Yahoo cybercrime, an official statement from EFCC has declared that a total of 978 convictions were made between January and September 2021 in Nigeria. This reported incident is observed to have caused colossal financial damage to Nigeria.[9]Not only that, the rising popularity of cyber fraud for decades and which does not seem to reduce despite government effort to curb it has given bad reputation to Nigeria as a country. As if the above is not enough, a recent Punch newspaper report of Monday 16 June 2025, has quoted the chairman, Economic and Financial Crime Commission, Mr. Ola Olukoyede raising an alarm at the growing rate of collaboration between internet fraudsters known as Yahoo boys and politically exposed persons. According to him, internet fraud has gone beyond online scams and now being used as a tool for laundering stolen public fund. He further disclosed that his office arrested a twenty two year old with five billion naira turn over in eighteen months and amazingly, the suspect has not worked for one day in his life.[10]All the above lead us to the question whether or not the existing law on prosecution of Yahoo Yahoo cyber crime is effective for reducing its increasing rate in Nigeria? The purpose of this study is therefore to examine the challenges confronting implementation of effective law on reduction of increasing scourge of yahoo yahoo cyber crime among students of tertiary institutions in Nigeria. This is done with the aim of achieving necessary reduction in the

[6]T Bello T, Anatomy of Cyber Crime in Nigeria, The Legal Chronicle, Journal of Social Studies vol3,9,2017,10.
[7]ibid
[8]T Bello, 'Anatomy of Cyber Crime in Nigeria', The Legal Chronicles at 5.
[9]Nigeria Investigates nearly 800 suspects arrested in massive Cyber crime raid. <www.voanews.com.nigeriaarrest>
[10] Mr. Olukyede made this known at a media briefing at EFCC headquarters Abuja in June 2025,and reported in Punch Newspaper of 16 June 2025.

rate of cyber crime among students in tertiary institutions Nigeria. The study shall also suggest the way forward at keeping the increasing rate of yahoo yahoo attack at its barest minimum in Nigeria.

2. Conceptual Analysis

While an analysis of the concept and effects of Yahoo Yahoo cybercrime in Nigeria is being carried out in this segment, it is observed that Yahoo Yahoo cybercrime are activities that involve the use of computer, phone and internet to defraud unsuspecting victims most importantly the people living outside Nigeria. The term Yahoo Yahoo, has become popular due to the fact that Yahoo Yahoo operators use Yahoo email, as Yahoo instant messenger is used as a dominant medium of communication between Yahoo Yahoo operators and victims. The use of Yahoo email is now related to Yahoo boys. However, it is observed on bad note that some group of Yahoo boys have advanced in their injurious activities by including the use of magic and spiritual power to aid the process of defrauding their victims. This advanced group is now called Yahoo Plus. Yahoo Yahoo business formally known as cyber fraud in Nigeria cyber crime law is not new to Nigeria as it emerged from the so called '419' illegal business common in Nigeria between 1980 and 1990.The 419 code though derived from Nigeria criminal code Act section 419, is an unlawful act of obtaining money from people through pretence, impersonation, cheating, falsification, counterfeiting, forgery and fraudulent presentation of facts. Therefore, the internet improved version of 419 could be described as yahoo yahoo cyber fraud common among Nigerian students.[11]

Various methods of Yahoo Yahoo cyber fraud include Website Prank, Sham identity, Silhouetted Profile, High Tech Disaster Fraud, Card Fraud, Phishing, Romance Scam and Business Email Compromise. Website Prank involves formation of fake website made purposely to generate money from whoever log on to the website. Sham identity involves using identification code of someone else to defraud other people in another country. Silhouetted Profile is a process whereby the imposter creates a fake identity of himself with the help of photoshop to deceive people and swindle them on internet. Credit Card account involves using someone else credit card name and account number to apply for loan, rent apartment, contract with utility companies, stealing and transferring money from existing bank account of other people. Phishing include the use of email online to steal personal information and credit card number.[12]

Causes of cyber fraud in Nigeria are however attributed to reasons which include; high level of poverty, high rate of unemployment among Nigerian students, bad leadership peer group influence among students, poor judicial system which often exhibit delay in trial of Yahoo operators in court and lack of stiff punishment and adequate penalties on students arrested with offence of cyber fraud.[13]

The effect of cyber fraud crime on the victims and the nation are colossal. At the national level, yahoo yahoo cyber crime has constituted a source of great financial loss to Nigeria as it has been found that over ₦250 billion was lost to Yahoo Yahoo deal in 2017 and ₦288 billion in 2018. It also affected individual victims and businesses in Nigeria as victims are known to have developed health issues and various forms psychosis due to financial loss to yahoo operators.

Increasing involvement of Nigerian students and youth in Yahoo Yahoo cyber fraud crime has great effect on the reputation of Nigeria as it ridicules the country in the community of nations. Many investors have great distaste in coming to Nigeria to invest their money in business simply because

[11]B Ogundele et al, 'Cyber Crime Activities and Emergence of Yahoo Yahoo Boys in Nigeria', International Conference on Cyber Management and Engineering, 2023, <www.Researchgate.net>.
[12]ibid
[13]O Ewepu, 'Cyber Crime in Nigeria; Analysis, Detection and Prevention' *FUOYE Journal of Engineering and Technology (*2016) 30 (1) 1, 30.

they are afraid of the bad reputation of Nigeria about activities of yahoo operators.[14] Involvement in Yahoo cyber fraud activities has serious effects on students involved, the school, their parents and the society. The reputation of such affected students have been affected as they are now stigmatized and called yahoo boys in the society meaning dangerous and fetish boys.

Some students who are involved in yahoo cyber fraud have become blinded by sudden and unexpected wealth and have become deviant and arrogantly disrespectful to their lecturers and authority in their schools. This impacts adversely on their academic performance and conduct. The case of students involved in yahoo plus is even more grievous activities of such students who use vital organs of human body to boost their cyber fraud activities often result in loss of human body parts and loss of lives as victims are maimed and murdered for ritual purpose. It is observed that yahoo cyber fraud has encouraged the spread of bad influence on coming generation of youth in Nigeria as the activity encourages laziness at the expense of dignity of labour.[15]The global market effect of Yahoo Yahoo cyber fraud is severe as profitable firms are closing business due to effect of Yahoo Yahoo activities while individual victims of cyber fraud groan in pain under heavy burden of financial loss in their businesses.

Discomforted by negative international and national image of Nigeria from Yahoo Yahoo cyber fraud activities, the federal government of Nigeria responded by using necessary legal and institutional framework and as well clamping down cyber criminals through surprise raids and sanctions aimed at limiting activities of cyber fraud criminals.[16]

3. Legal Framework on Reduction of Yahoo Yahoo Finance Cybercrime

Legal regime on cyber crime is referred to as the series of law that deal with control and reduction of issues relating to internet fraud and computer offences including yahoo cyber fraud, intellectual property etc. Cyber crime law applies to government offices, organizations, companies and business, common citizen, students and everyone who makes use of internet.[17]

Cyber crime law varies from country to country and jurisdiction to jurisdiction, while the penalties which depend on the nature of the offence range from fine to imprisonment. The increase in level of E-commerce led to increase in level of cyber fraud and hence the need for cyber crime law to curb the increase in the rate of malpractice on it.

The series of law regulating yahoo yahoo cybercrime in Nigeria include; the Criminal Code Act, the Penal Code Act, Economic and Financial Crime Commission Establishment Act 2004(EFCC Act), Advanced Fee Fraud And Other Related Offences Act 2006(AFF Act), Cyber Crime Prohibition And Prevention Act 2015.

(i)The Penal Code Act 1960[18]

The Penal Code Act is the applicable law to Northern states in Nigeria including the Federal Capital Abuja and it has law that can be used to fight cyber crime. Section 320 (a) makes it a crime for whoever deceives any person or fraudulently or dishonestly induced the person so deceived to deliver property or fraudulently consent that any person shall retain his property.

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[14]O Aimee, 'Terrifying Cyber Crime and Cyber security Statistics and Trends,' <https://www.comparitech.com/vpm/cybersecurity2018>; A Dariola, 'Nigeria Loses over ₦127 Billion Annually to Cybercrime' <https://www.dailypost.ng> accessed 20 October 2019.

[15] O Taoz, 'Spiritual Dimension to Cyber Crime in Nigeria, the Yahoo Plus Phenomenum', *Human Affairs Journal of Social Studies*, (2017) 9.

[16]S O Oladeji et al, 'The Menace of Activities of Yahoo Yahoo boys in Nigeria and the Need for Government Intervention', *African Journal of Adult Learning*, (2021) 1 (1)

[17]T Babafemi, 'An Appraisal of the Legal Framework for Consulting Cybercrime in International Law, Masters Dissertation, School of post Graduate Studies, Ahmadu Bello University Zaria (2016), 30.

[18]Criminal Code Act cap 38 Laws of the Federation of Nigeria 2004 as applicable to Southern State while Penal Code applicable to Northern States including Abuja.

Also, section. 320 (b) makes it a crime to cheat by any person or whoever intentionally induced the deceived person to do or omit to do anything which he would have done if not deceived and which act causes damage to the mind, body and reputation of the person deceived.

Further, section 362 of the Penal Code Act makes it a crime of forgery to any person or whoever dishonestly makes signs or execute false document with intent of making others believe the document is authentically backed by relevant authority whereas the document is fake.[19] From the above, it is observed that the Penal Code Act has some provisions that are for curbing crime related cyber fraud.

(i) **The Criminal Code Act 1990**[20]

The Criminal Code Act is the law applicable to states in the southern part of Nigeria. the act criminalizes any type of stealing and as well as the use of false pretense to dispossess other persons of their property or valuable. Importantly, section 419 makes it a crime for any person who by false pretense and intention to defraud obtains from any other person anything capable of being stolen or induces other person to deliver to any person anything capable of being stolen. such a person is guilty of felony and liable to imprisonment for three years.[21]

Further section 421 of the Criminal Code makes it a crime for any person who by use of trick or fraudulent device obtains anything capable of being stolen or induces any person to deliver to any person what is capable of being stolen, or pay or deliver money or goods greater than the sum of money or quantity he paid for or would have been delivered, but for such trick and device, such a person is guilty and liable for two years imprisonment. It is equally observed from the above, that the Criminal Code Act also contains relevant provisions decreasing the rate of cyber fraud.

(iii)**The Economic And Financial Crime Commission Establishment Act 2004 (EFCC Act)**

The above Act created the EFCC as a commission with power to coordinate and enforce necessary actions on all economic and financial crime law. Section 6 (a) and (b) of the EFCC Act confer on the EFCC, the responsibility for enforcement and the administration of the provisions of the Act which include investigation of all financial crimes, investigation of advanced fraud, money laundering, counterfeiting, future market fraud, illegal charge transfer, fraudulent establishment of negotiable investment, contract scam and computer credit card fraud etc.[22] Based on the above, the EFCC Act could be said to be very much relevant for curbing yahoo yahoo cyber crime.

(iv)**Advanced Fee Fraud and Other Related Offences Act 2006.**

Section 11A (1) of the AFF Act above, states that personal information of all customers is required to be obtained by any person or easily providing electronic communication service or remote computer service.[23] Also, section 2 of AFF Act makes it an offence to commit fraud by false pretense. Section 12 AFF Act prohibits accepting internet users as anonymous. It thus compels internet service provider and cyber café owners to obtain necessary information about their internet customers.[24] The above provisions show that the AFF Act generally provides means of fighting fraud including cyber crime, internet fraud, obtaining by false pretense and other types of fraud.

[19]Penal Code Act C.P, Law of the Federation of Nigeria, 2004.
[20]Criminal Code Act C.P 38 Laws of the Federation of Nigeria 2004.
[21]See the Cases of *State v Osuafor* (1972), ECSC, LR 412 and *Abasi v C.O.P* (1965) NMLR. 461.
[22]Economic and Financial Crime Commission (EFCC Act) 2004.
[23]Advanced Fee Fraud and other Related Offences Act 2006.
[24]M TaofikLodan, 'The Effectiveness of Legal and Enforcement Framework in Fighting Advanced Fee Fraud and Money Laundering Activities'. Being a paper presented at the 3rd National Seminar on Economic Crime Organized by Central Bank of Nigeria held at Musa Yar'Adua Centre Abuja on 27.29 June 2004.

(iv) **The Cyber Crime Prohibition and Prevention Act 2015.**
The above Act which is applicable to all parts of the federation on Nigeria is a rule of legislation purposely enacted by the Federal Government of Nigeria to deal with crimes and serious threats currently facing the digital world.

Section 1(a) of the Act provides an effective and unified legal, regulatory and institutional frame work for prohibition, prevention, detection, prosecution and punishment of cyber crimes in Nigeria infrastructure.[25]

Section 1(c) deals with provision of cyber security and protection of computer system and networks, electronic communication, data and computer programes, intellectual property and privacy rights.[26] Section 5(a) of the Act defines critical infrastructure as systems and assets that are vital to the country and destruction of such system and assets would have impact on the security, national economic security, national public health and safety of the country. Section 5(b) makes it punishable for committing crime against such critical national infrastructure. The Act provides payment of ₦20 million or 10 years imprisonment for child phonography, payment of ₦10 million or 5 years imprisonment for cyber hackers. The adequacy of Cyber Crime Prohibition and Prevention Act for reduction of increasing rate of digital cyber crime called yahoo cyber fraud among students in Nigeria can be understood from various available provisions of the Act above.[27]

(v)**Evidence Act 2011.**
The Act is also part of the law used for control of cyber crime in Nigeria. Section 84 of evidence Act makes provision for admissibility of electronically generated evidence.

4. **Effectiveness of the Legal Framework on Reduction of Yahoo Yahoo Cybercrime among Tertiary Institutions Students in Nigeria**
An assessment of effectiveness of the above series of law on reduction of Yahoo Yahoo cybercrime especially among Nigerian students shows the following:
(i) Penal Code Act and Criminal Code Act
It is observed that as at today both the Penal Code Act and the Criminal Code Act, have not contributed much to achieving reduction of Yahoo Yahoo cybercrime committed by Nigerian students in tertiary institutions, due to some inherent short comings in the Acts;[28]
The digital involvement of Yahoo Yahoo cybercrime in relation to the use of computer or ICT infrastructure to carry out fraudulent acts like identity theft or credit card fraud, makes it very difficult if not impossible to secure a conviction for a person that commits cyber fraud. This is because contrary to the requirements of law in section 382 and 383 of Criminal Code Act, which require that tangible goods or property be removed from its rightful owner, information can easily be manipulated to commit fraud and get economic advantage or even steal without physical deprivation of the original property owner or the property being physically removed.

Also, the archaic nature of the Criminal Code Act is revealed in section 419 which states that a criminal must be caught in the act of stealing, or caught in the act of deception by using false pretense before such an accused can be arrested for committing criminal act whereas, cyber criminals now a days, are very smart and can delete all traces of the crime before warrant of arrest can be put against them. In addition, the punishment of two to three years imprisonment for cyber criminals is so meager and inadequate to discourage large number of youth from committing cyber

[25]Cyber Crime (Prohibition) Prevention Act 2015 S. 24.
[26]U Veronica et al, 'Appraising the Law Governing Control of Cyber Crime in Nigeria', *Journal of Law and Criminal Justice* 1, June 2020 p30.
[27]I Frank and E Odunayo, Approach to Cyber Security issues in Nigeria: Challenges and Solutions, *International Journal of Cognitive Research in Engineering and Education*, vol.1, 1 at 1, p.1.
[28]B Tomilehin, 'An Appraisal of the Legal Framework of Cyber Crime in Nigeria' https://www.info@clrwc.com accessed 10 August 2025.

fraud worth millions of naira.[29]All the above have contributed to ineffectiveness of Penal and Criminal Code Act in reducing financial cyber crime.

(ii) The Economic and Financial Crime Commission Establishment Act.

It is observed the above Act has engaged the EFCC agency on series of activities involving enforcement of law on financial crime since its inception. One of such popular cases is that of *Federal Republic of Nigeria v Chief Emmanuel Nwude & ORS*, whereby the accused persons were charged for 57 counts including scamming to the tune of $181.6 million. Having found guilty, the culprits were sentenced accordingly, their asset were forfeited to the federal government and proceeds of the scam recovered and returned to the owner.[30]There are also several arrests, prosecutions and court judgements secured against perpetrators of cyber fraud in Ilorin zonal office, Ibadan, Lagos and other zonal offices of the Economic and Financial Crime Commission in Nigeria. However, it is observed that the EFCC Act has not totally succeeded in reducing the practice of Yahoo Yahoocyber crime among students in tertiary institutions in Nigeria due to some inherent weaknesses.

Following a critical observation, it could be said the EFCC Act is established more purposely to focus on taking legal actions against economic and financial crimes like money laundering, diversion of public fund, embezzlement often committed by the political class rather than cyber crime like phishing, business email compromise, silhouetted profile, romance scam and high tech disaster fraud which are more often committed by tertiary institution students.[31]

Importantly, there have been reported cases of compromise and poor enforcement of the EFCC Act by some EFCC law enforcement officers who are recently known to be collecting bribe and colluding with yahoo boys rather than subject them to outright arrest and trial in court.[32] Added to the above is the fact there have been reports of unnecessary overzealousness on the part of EFCC enforcement team who forcefully entered into some living premises to arrest suspected yahoo boys at odd hours like 2 A.M in the morning in Lagos and Anambra states in 2025, which is contrary to the officially approved hours for such operation by the agency. This development has led to the killing of two EFCC officers who were allegedly mistaken to be armed robbers.[33] The above are part of the factors hindering effectiveness of law on reduction of Yahoo Yahoo cyber crime among Nigeria students.

(iii)Advanced Fee Fraud and Other Related Offences Act 2006.

Despite crediting effectiveness of the above Act to the fact that it provides ways of fighting fraud including internet fraud, cyber crime and other fraud as could be found in the provision of section 12. This section enjoins business owners, financial institutions, internet providers and cyber café owners to obtain necessary information about their customers with the aim of ensuring prompt identification and arrest of cyber fraud perpetrators in Nigeria.[34] Also, the fact that the Act requires that providers of internet service shall register with the Economic and Financial Crime Commission, all with the aim of ensuring customers that commit cyber crime are easily traced and arrested.

However, inspite of the success of the above Act, it can still not be said that the practice of Yahoo Yahoo cyber crime has totally reduced among Nigerian students. The fact on this is known when one considers the fact that banks data base in Nigeria has continued to be hacked on daily basis

[29]S Zevar, An Appraisal of the Legal Framework for Combating Cyber Crime in International Law 2. (11) Unpublished thesis, 94.
[30]A A Mohammed, 'EFCC and the Fight Against Corruption in Nigeria. A Review of President Obansanjo Years in WUAM, Makurdi-Aboki Publishers 2011, 107.
[31]ibid
[32]ibid
[33]ibid
[34]Section 19, Advanced Fee Fraud Act, 2006.

because some insiders in the banks are observed to be assisting the hackers with some information on customers account status. By the above, it shows that the idea of banks and cyber café knowing their customers has ended up with negative result. This is part of what is militating against effective laws at reducing Yahoo Yahoo cyber crime among Nigerian students.

(iv)Cyber Crime Prohibition and Prevention Act 2015

In as much as the above Act could be said to have been effectively put in place and employed for combating Yahoo Yahoo crime among students in Nigeria, the issue of jurisdiction has reduced effectiveness of enforcement of the law.[35] Since cyber crime is a type of crime that can be committed globally across the boundary of Nigeria, as long as there is connection on the website. It becomes difficult atimes to be able to prosecute cyber crime offenders from other jurisdiction in another country as a result of territorial boundary and the legal requirement of other countries. This is part of what led to initial delay in trial in the case of *FBI v Raymond Abbas (Hushpuppi in 2020)*.[36]

Another factor on effectiveness of cyber crime prohibition and prevention is the issue of burden proof which lies on the prosecution while proving cases of cyber crime in court. There had been instances where the prosecutor is not computer literate and did not possess the required forensic knowledge for tackling cyber crime. In some cases, some trial judges are not adequately computer literate to know the working of computer network system and this makes it difficult for the prosecution to easily prove its case. This situation usually creates soft landing for cyber criminals while owners of cyber café where the crime was committed often escape liability.

4.1 The Challenges to Effective law on Reduction of Yahoo Yahoo Cyber crime

As at today, it is observed the act of corruption and compromise often displayed by some members of the Police force and members of the Economic and Financial Crime Commission (EFCC) in Nigeria is one of the challenges of all the laws on reduction of Yahoo Yahoo cyber crime in Nigeria. Reports are abound where some EFCC officers who are supposed to firmly enforce the law on arrested Yahoo boys are known to have been involved in receiving big financial bribe and subsequently released the arrested Yahoo boys. This bad practice has continued to circumvent the power of law at reducing the rate of Yahoo Yahoo cyber crime in Nigeria.[37]

Another challenge to effective law on reduction of Yahoo Yahoo cyber crime among tertiary institutions students in Nigeria, is poor level of technical knowledge of computer and application of computer network system by the law enforcement officers and some judges. This factor serves to frustrate trial proceedings on internet financial crime.

Lack of discipline and lack of adequate protection of law enforcement agents is another factor which fast militating the success of law at reducing the scourge of Yahoo Yahoo cyber crime in Nigeria. It is share lack of discipline and respect for the rule of law which made it possible for the EFCC officials to set out and carried out search exercise on suspected Yahoo boys at 2A.M in the middle of the night as against daytime search period approved by law of the Economic and Financial Crime Commission. Similarly it is lack of adequate protection which made such EFCC officers involved in such overzealous act, to be gunned down and killed by their suspects in Lagos state and Anambra state Nigeria between January and February 2025.[38] The above incidents have served to discourage the zeal for genuine law enforcement actions against yahoo boys in Nigeria.

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[35]Cyber Crime Prohibition and Prevention Act 2015.

[36]C Ibekwe, 'The Legal Aspect of Cyber Crime in Nigeria; An Analysis with the UK provision (unpublished thesis work, July 2015 at 15.)

[37]M AbdullahiSualawa, 'An Overview of the Legal Framework Advanced Fee Fraud', *Hasanuddin Law Review* (2016) 12(2) < http://docdoi.org/1020956/halrgv>

[38]O Adejoke, 'The ICT Revolution and Commercial Sectors in Nigeria: Impact and Legal Intervention, *British Journal of Arts and Social Sciences* ', *British Journal Publishing Incorporation* (2012) 5(2) 54.

The issue of jurisdiction in apprehending and trial of Yahoo Yahoo suspects is another challenge. This is because a person who sits in his room in Nigeria and commits cyber crime against a victim in America may subject the trial court to lack jurisdiction in trying such a case particularly when no evidence is received from America. The above thus makes the crime to increase in Nigeria.[39]

Further, unavailability of paid job especially among large number of graduates of Nigerian universities and increasing level of poverty among youth in Nigeria have led to increase in involvement of youth in Yahoo Yahoo crime in Nigeria.[40]

5. Conclusion

The paper has extensively discussed the effects of the Yahoo Yahoo cybercrime as an increasing financial on line crime among the youth in tertiary institutions in Nigeria and on Nigeria as a country. The available legal regime for reducing the increasing rate of Yahoo Yahoo cyber crime among students in tertiary institutions in Nigeria has also been discussed while the effectiveness of the legal regime for reduction of Yahoo Yahoo cybercrime has also been appraised. It is however observed, that despite the fact that some of the above laws are being enforced for arresting and securing court sentences for Yahoo Yahoo convicts, activities of Yahoo Yahoo cyber crime have continued to thrive in Nigeria.

The challenges to effectiveness of law for reduction of Yahoo Yahoo cyber crime in Nigeria are however found to include, acts of corruption and compromise often displayed by some officers of the police force and some officers of the EFCC who are now observed to be collecting bribe and setting free some of the arrested cyber crime suspects.[41]Poor level of technical knowledge of computer and application of computer network system both by the law enforcement officer and some judges in court is equally a great hindrance to establish the burden of prove in Yahoo Yahoo cyber crime trials. Also lack of discipline and adequate protection on the part of law enforcement officers of cyber crime particularly officers of Economic and Financial Crime Commission is another challenge to winning the war on reduction of Yahoo Yahoo cyber crime in Nigeria.

In order to strengthen the existing law on reduction of Yahoo Yahoo cybercrime among students in tertiary institutions in Nigeria, it is hereby recommended that stringent law should be applied to any law enforcement officer found guilty of collecting bribe or compromising with Yahoo suspects in order to circumvent the law in Nigeria.[42] There should be adequate computer and network system training for some judges and officers of Economic and Financial Crime Commission. Government should provide youth employment programmes where young graduates can be trained in skills and provided jobs after graduation from tertiary institution

There should be adequate enlightenment to parents to keep watch on the activities of their children who are in tertiary institutions while students should be enlightened to divert their energy on the positive use of their cyber skills and do away with fraudulent activities.[43]

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[39]A NuremiAyofe and B Irwin, 'Cyber Security ChallengesAnd the way forward GESI, Computer and Science', *Telecommunication Journal* (2010) 29 (6).

[40]I Frank and E Odunayo, 'Approach to Cyber Security issues in Nigeria: Challenges and Solutions' *International Journal of Cognitive Research in Science, Engineering and Education* (2013) 1(1) 1.

[41] The EFCC on 7, January 2025, confirms it dismissed twenty seven of its officers in 2024 for misconduct and fraudulent activities resulting in probe of $340,000 fraud complaint. Also, an high court in Lagos has ordered refund of $20,000 bribe, collected by EFCC officer in connection with Clean Serve MD's case in 2024.Justice Mojisol Dada of Ikeja Special Offences Court ordered Economic And Financial Crime Commission to refund Mr. Olalekan Abdul, the above sum after he money was admitted in court as exhibit in a fraud trial which he was later acquitted. www.utube.com.watch

[42]J Onyekwere, 'Cyber Crime Act 2015, and Need for Further Amendment', Guardian News Paper, 20, August 2005.

[43]O Johnson, 'Automated Teller Machine (ATM) fraud in Nigeria: The Way Out' *Unilorin Journal* (2011) 5, 5.