



X (Re), 2019 CanLII 131285 (CA IRB)

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RPD File No. / N° de dossier de la SPR : TB2-09244

TB2-09265

*Private Proceeding / Huis**clos***REDETERMINATION****Reasons and Decision – Motifs et Décision**

Claimant(s)	XXXX XXXX XXXX XXXX XXXX XXXX XXXX	Demandeur(e)(s) d'asile
Date(s) of Hearing	January 8, 2019	Date(s) de l'audience
Place of Hearing	Toronto, Ontario	Lieu de l'audience
Date of Decision and reasons	January 29, 2019	Date de la décision et des motifs
Panel	James Waters	Tribunal
Counsel for the Claimant(s)	Adela Crossley Barrister and Solicitor	Conseil(s) du (de la/des) demandeur(e)(s)

d'asile**Designated
Representative(s)**

XXXX XXXX XXXX

**Représentant(e)(s)
désigné(e)(s)****Counsel for the
Minister**

N/A

**Conseil du (de la)
ministre****REASONS FOR DECISION**

[1] The principal claimant XXXX XXXX XXXX is the designated representative for the minor claimant, her daughter XXXX XXXX XXXX. Both claimants are citizens of Nigeria and claim refugee protection pursuant to [sections 96](#) and [97\(1\)](#) of the *Immigration and Refugee Protection Act* (IRPA).

[2] The initial hearing was held on November 14, 2017. The Refugee Protection Division rejected the claim for refugee protection on November 17, 2017.^[1]

[3] The principal claimant successfully sought leave to commence an application for judicial review.^[2]

[4] In her Judgement and Reasons^[3] with respect to the judicial review application, Madam Justice XXXX found the RPD's credibility and internal flight alternative analysis to be unreasonable and allowed the application for judicial review.

[5] The de novo hearing was held on January 8, 2019.

[6] In assessing the claims, I considered Chairperson's Guideline 4: *Women Refugee Claimants Fearing Gender-Related Persecution*.^[4]

ALLEGATIONS

[7] The principal claimant alleges that she was in an abusive relationship from XXXX 2006 until XXXX 2012 while living in Nigeria with a male common-law partner XXXX XXXX.

[8] She alleges that they are the biological parents of the minor claimant who was born on XXXX

XXXX, 2011.

[9] The principal claimant alleges that her common law partner and his family insisted since the minor claimant's birth that she be circumcised and ignored the principal claimant's objection to her daughter being subjected to such a practice.

[10] The principal claimant alleges that her common law partner informed her on XXXX XXXX, 2012 that the minor claimant's circumcision would take place on XXXX, XXXX XXXX, 2012.

[11] The principal claimant made arrangements with the assistance of a friend for her and the minor claimant to travel to Canada on a false passport.

[12] She alleges that they arrived on XXXX XXXX, 2012 and made refugee claims on July 19, 2012 to avoid the minor claimant being circumcised and the principal claimant being subjected to further domestic abuse.

IDENTITY

[13] The claimant's oral testimony in the Yoruba language and the supporting documentation filed established on a balance of probabilities that the principal claimant is a citizen of Nigeria. The supporting documentation included a copy of her birth certificate^[5] and school certificates.^[6]

[14] The Nigerian nationality of the minor claimant was established by the oral testimony of the principal claimant and the filing of a copy of the minor claimant's birth certificate^[7] which listed the principal claimant and XXXX XXXX XXXX as her parents.

[15] The common law relationship between the principal claimant and XXXX XXXX XXXX was established by her oral testimony and the supporting documentation including the minor claimant's birth certificate and photographs^[8] of the principal claimant and her common law partner together.

CREDIBILITY

[16] The standard of proof for assessing evidence as well as credibility is a balance of probabilities that the evidence is, more likely than not, true. When a claimant swears to the truth of certain allegations, this creates a presumption that those allegations are true unless there is a reason to doubt their truthfulness. In assessing the credibility of a claimant, the panel is entitled to make reasonable findings based on implausibility, common sense and rationality, and may reject evidence if it is not consistent with the probabilities affecting the case as a whole.

[17] The principal claimant's description at the de novo hearing of the domestic abuse she suffered from

her common law partner and his family's interest in circumcising their daughter was generally consistent with the information in her original narrative.

[18] An affidavit^[9] from a friend who assisted the claimants in leaving Nigeria supported the principal claimant's oral testimony as to being a victim of domestic abuse and having problems with her partner and his family over her objection to the circumcision of the minor claimant. However, the principal claimant testified that this friend was a neighbour whom she met after moving in with her common law partner in XXXX 2006.

[19] Paragraph one of the affidavit indicates that the deponent of the affidavit is a childhood friend of the principal claimant. The claimant was not able to explain why the deponent of the affidavit described the principal claimant as a childhood friend while the principal claimant testified that she met her for the first time as an adult living as a neighbour in the vicinity of her common law partner's home. Given this discrepancy as to the origin of their relationship, I gave little weight to the affidavit submitted. It also casts doubt on the credibility of the principal claimant as the affiant is allegedly the person who assisted the claimants to leave Nigeria.

[20] Section 31 of the Personal Information Form instructs claimants to "set out in chronological order **all the significant events and reasons** that have lead you to claim refugee protection in Canada. Indicate the measures taken against you and your family."

[21] In paragraph 1 of her amended narrative,^[10] the claimant explained why she did not disclose the traumatic childhood sexual abuse she suffered at the hands of an uncle in Nigeria in her original narrative. She mentioned this childhood sexual abuse at her first hearing.^[11] She disclosed this abuse to Dr. XXXX who mentioned it in her psychological assessment.^[12] It was not mentioned in Dr. XXXX report^[13] filed at the first hearing. Dr. XXXX updated report^[14] indicates that the principal claimant's childhood and adolescent sexual abuse was subsequently disclosed to her. The claimant makes clear in her amended narrative that she is not fearful of the uncle who abused her as a child but only her former common law partner and his family.

[22] Credibility concerns also surfaced at the de novo hearing relating to evidence or lack of evidence submitted in support of factors or issues mentioned in the claimant's amended narrative. The original Personal Information Form narrative made no mention of threats made against the principal claimant's parents after she left Nigeria. It also made no mention of the principal claimant having been diagnosed with Hepatitis "B" after coming to Canada.

[23] No oral or documentary evidence of threats made against the principal claimant's parents by her former common law partner was adduced at the first hearing. No mention was made in the oral testimony or medical evidence filed at the first hearing that the claimant had been diagnosed with Hepatitis "B".

[24] In her amended narrative, the principal claimant disclosed that her common law partner attended at her mother's house in XXXX with other men inquiring about the whereabouts of the claimants and threatened her mother and threw stones at her house in late XXXX 2017^[15] after the first hearing. The principal claimant testified at the de novo hearing that her mother's house was close to the home of her common law partner.

[25] The principal claimant was questioned about the plausibility of her husband making his first trip to look for the claimants at the principal claimant's mother's home more than five years after the claimants left Nigeria. The principal claimant testified that her mother was harassed previously but provided no cogent reason for not mentioning the harassment previously in her original narrative nor at her first hearing.

[26] The principal claimant testified that her mother was not fluent in the English language. The principal claimant filed at the hearing an e-mail copy of a letter^[16] in the English language allegedly signed by her mother addressed to her counsel dated XXXX XXXX, 2019 which provided details of this incident including a threat to burn down the house. The principal claimant was unable to explain the process by which her mother was contacted to provide this letter. The letter is not translated and I give it little weight as it was obviously not composed by her mother and no explanation was provided as to the circumstances as to how this letter was composed and presented to her mother for signature.

[27] The principal claimant disclosed in her amended narrative^[17] that she had been informed by a Canadian doctor that she had Hepatitis B and that this would make it difficult for her to live in Nigeria. The principal claimant testified that Dr. XXXX XXXX was her family doctor. It was pointed out that there is no mention of this Hepatitis B diagnosis in either medical report submitted by Dr. XXXX.

[28] The claimant indicated as a reason for its absence that she wished to keep the diagnosis private. The principal claimant confided her serious mental health issues including suicidal ideation to her family doctor. A satisfactory explanation was not provided for the omission of this diagnosis Hepatitis "B" in the two medical reports of Dr. XXXX.

[29] When a claimant can readily obtain corroborative evidence that would normally be filed at the adjudicative tribunal to strengthen or to prove a bare allegation, it is reasonable to expect the party to present the best evidence in support of their case. Failure to do so may result in less weight or no weight to be attributed to the bare allegation. This principle is akin to the presumption that arises against a party not calling a witness who may provide relevant evidence on an issue. This expectation of the party to present the best evidence was articulated by Justice Annis in *Garcia*:

Moreover, the requirement to attribute truthfulness to an applicant's sworn statement, as first enunciated in *Maldonado v Canada (Minister of Employment and Immigration)*, 1979 CanLII 4098 (FCA), [1980] 2 FC 302, 31 NR 34 (FCA), reflects a policy that exigent circumstances

facing fleeing refugees may compromise their ability to present corroborative documentation. Conversely, when a claimant has, or may readily obtain, corroborative evidence in situations where it normally would be filed with the adjudicative tribunal to bolster the weight of an otherwise bare allegation, it is expected that the party will adhere to the ordinary reliability requirements to introduce the best evidence in support of their case. If they fail to do so, less weight (or none at all) may be attributed to the statement. The situation is similar to the presumption that arises against the party not calling a witness who may provide relevant evidence on an issue. ^[18]

[30] When a claimant can readily obtain corroborative evidence that would normally be filed at an adjudicative tribunal to strengthen or to prove a bare allegation, it is reasonable to expect that the party to do so. The principal claimant did not file any medical evidence relating to her alleged Hepatitis “B” diagnosis. The claimant did not establish on a balance of probabilities that she suffers from Hepatitis B.

[31] The principal claimant testified as to her experiences with suicidal ideation in her questioning by her counsel. A detailed medical report ^[19] from the principal claimant’s family physician supported the diagnosis of significant mental health concerns contained in a psychological assessment. ^[20] The principal claimant established on a balance of probabilities the existence of serious medical health concerns outlined in the reports of both Dr. XXXX and Dr. XXXX. The second report of Dr. XXXX and the psychological assessment of Dr. XXXX both alluded to traumatization and feelings of shame arising out of the childhood sexual abuse and domestic abuse.

[32] I have some concerns with respect to the credibility of the principal claimant. Serious omissions from her original narrative as to the problems faced by her parents after leaving Nigeria were not satisfactorily explained. The reliability of the affidavit of her friend ^[21] was tainted by the principal claimant’s contradictory testimony as to when and where she met the affiant.

[33] In the course of the original and de novo hearings, the principal claimant voluntarily introduced two other prospective grounds for her claims, namely childhood sexual abuse and Hepatitis “B”.

[34] With respect to childhood sexual abuse I accept her explanation as to why she did not disclose this initially and her considered opinion that it is not a ground for her current fear.

[35] With respect to an alleged Hepatitis “B” medical condition, I am not able to find on the evidence produced that the principal claimant has been diagnosed with Hepatitis “B”.

[36] Given my concerns with aspects the principal claimant’s oral testimony and the tainted personal documentary evidence she submitted to support it, I reviewed briefly the objective basis for the claims based on domestic abuse and female genital mutilation (FGM).

Objective Basis

[37] A British Home Office Country Information and Guidance Report on Nigeria: Women Fearing gender based violence^[22] states that “[d]omestic Violence against women is widespread, underreported and is often considered socially acceptable, although attitudes are starting to change.”

[38] A United States Department of State Report on Nigeria Human Rights Practices for 2017^[23] states that “Police often refused to intervene in domestic disputes or blamed the victim for provoking the abuse.”

[39] Response to Information Request NGA104980.E^[24] describes domestic violence against woman as common practice that cuts across all socioeconomic and cultural backgrounds.

[40] Response to Information Request NGA 105628.E reports that Nigeria has the largest instances of FGM (also known as female circumcision or genital cutting) in the world.^[25]

[41] Response to Information Request NGA106183.E indicates that the *Violence Against Persons (Prohibition) Act* (VAPP) is currently only in effect in the Federal Capital Territory (FCT) of Abuja and that each state must adopt legislation similar to the federal legislation to prohibit FGM in that state. Sources mention that no perpetrators of FGM have been prosecuted in Nigeria and that the Act is not enforced.^[26]

[42] The objective country documentation establishes an objective basis for the claims based on domestic abuse and female genital mutilation.

[43] If found credible, the principal claimant would face a serious possibility of persecution from her husband if she returns to her home in XXXX on a Convention refugee ground related to her membership in a particular social group, women subject to domestic violence.

[44] If the principal claimant was found to be credible, the minor claimant would face a serious possibility of persecution should she return to her home in XXXX Nigeria from her biological father and his family who wish to circumcise her.

[45] Having regard to all of the evidence and giving the principal claimant the benefit of the doubt, sufficient reliable and trustworthy evidence was presented to support a finding on a balance of probabilities of the existence of a serious interest in circumcising the minor claimant by the principal claimant’s former common law partner and his family. Sufficient reliable and trustworthy evidence was presented to support a finding on a balance of probabilities that the principal claimant was a victim of verbal and physical abuse by her former common law partner while living with him in XXXX Nigeria.

[46] The determinative issue is internal flight alternative.

INTERNAL FLIGHT ALTERNATIVE (IFA)

[47] An IFA arises when a claimant who has a well-founded fear of persecution in his or her home area of the country is not a Convention refugee because he or she has an internal flight alternative elsewhere in the country.

[48] The test to be applied in determining whether there is an IFA is two pronged: [27]

- i) The Board must be satisfied on a balance of probabilities that there is no serious possibility of the claimant being persecuted in the part of the country to which it finds an IFA exists.
- ii) Conditions in the part of the country considered to be an IFA must be such that it would not be reasonable, in all the circumstances, including those particular to the claimant, for him to seek refuge there.

[49] The Federal Court of Appeal [28] sets a very high threshold for the “unreasonableness test” requiring nothing less than the existence of conditions which would jeopardize the life or safety of the claimants. There must be actual and concrete evidence of such conditions.

[50] Nigeria is the most populous country in Africa having in excess of 190 million people spread over 36 states and the Federal Capital Territory. [29] Multiple languages are spoken and tribal affiliation and cultural differences can be significant factors in considering the feasibility of a claimant relocating to a specific area. Nigerians however have a right to reside in any part of the country. [30] The documentary evidence shows that all main centers are linked by road, in addition many of the large urban centers boast international airports. [31]

[51] I identified the cities of Benin City and Port Harcourt as proposed internal flight alternatives for the claimants. After reviewing the relevant country documentation and jurisprudence. I note that internal relocation in Nigeria is generally considered to be viable for refugee claimants fearing non-state actors. This is dependent on the nature of the threat and the individual circumstances of the claimants.

[52] With respect to transportation and travel, I have considered the Chairperson’s Gender Guidelines which instruct me in determining the reasonableness of a woman’s recourse to an internal flight alternative to consider the ability of women because of their gender, to travel safely to the IFA and to stay there without facing undue hardship. I am persuaded on a balance of probabilities that the claimants can travel safely to either Port Harcourt or Benin City.

[53] At her first hearing, the claimant testified that there was no place anywhere she could hide because her common law partner would always look for her and fish her out wherever she was hiding. In her Amended narrative, [32] she mentioned that her common law partner owned a store in XXXX called XXXX which does

XXXX XXXX XXXX. The principal claimant testified at the de novo hearing that her common law partner who is XXXX could utilize his business contacts with XXXX XXXX union thugs who patronized his XXXX XXXX to locate her anywhere in Nigeria. She also indicated that her father in law was a prominent politician.

[54] There was no mention of her father in law being a XXXX XXXX in her original narrative or her oral testimony at the first hearing which the Federal Court described as brief. The prominence of her common law partner's family was mentioned in her amended narrative.

[55] Upon my own review of the evidence, I find the assertions made by the principal claimant about her common law partner's ability to locate her in Port Harcourt and Benin City speculative and not supported by the objective country documentation evidence. The evidence presented does not establish on a balance of probabilities the capacity or ability of the common law partner to track the claimants to Port Harcourt or Benin City. The claimants did not discharge their onus of establishing a serious possibility of persecution in either proposed internal flight alternative location, namely Port Harcourt or Benin City.

[56] I reviewed the RAD persuasive decision TB7-19851^[33] which focusses specifically on the situation for relocation within Nigeria for single women. While the decision is more widely applicable, the claimants in this case are a 40 year old single woman fearing domestic abuse and her seven year old daughter fearing FGM.

[57] The principal claimant cited language and her lack of indigeonship in both Port Harcourt and Benin City as reasons she would stand out in both proposed internal flight locations.

[58] English is the official language of Nigeria^[34] and both claimants speak English. They are also Christians which provides an avenue to establish or develop relationships tied to their religious beliefs.

[59] The principal claimant testified at the de novo hearing that she would not be able to forge a social support network of friends due to a lack of indigeonship in both Port Harcourt and Benin City. She indicated that the Yoruba language and the English language were not widely in use in either location. The principal claimant testified that she only attends Christian Churches where the Yoruba language is spoken. However, at her first hearing, she testified with no difficulty in the English language.

[60] The objective documentary evidence^[35] indicates that both English and Yoruba are languages widely spoken across southern Nigeria including Benin City and Port Harcourt.

[61] The principal claimant left high school when she was almost eighteen years old and was employed as a seller of XXXX XXXX working with her mother from her mother's house. She testified that she would be able to sell XXXX and XXXX in both Port Harcourt and Benin City but knew no one there.

[62] The documentary evidence indicates that there is a high rate of unemployment in Nigeria generally,

and that obtaining employment can be difficult. The documentation indicates that there are more female-headed households in the south, and that it is generally easier for woman in the south to obtain work than in the north although they often end up doing difficult work.^[36]

[63] The principal claimant did not obtain a post-secondary education while living in Nigeria. She qualified and worked as a Personal Support worker (PSW) since coming to Canada and has also worked in factories here. She testified that there were no job market for personal support workers in urban centers in Nigeria and there was no factory work available to women in Nigeria. The principal claimant's high school educational background, training in Canada coupled with prior job experience in Nigeria places her in the upper half of Nigerian women socio-economically.

[64] In her prior hearing, the claimant testified that she would need a birth certificate to enroll her child in school and that she will also be required to provide a consent letter from the child's father. She mentioned neither of these issues initially in testifying at her de novo hearing.

[65] She acknowledged at her de novo hearing that she might be able to apply for a birth certificate for her daughter on her own. She identified at her first hearing her personal experience of her father providing a letter consenting to her attending school as the basis of her belief that such a consent letter was required. She did not place the same emphasis on this reason at her de novo hearing and acknowledged that she didn't really know whether a consent letter from the child's father was necessary to enroll the child in school.

[66] At the de novo hearing, the results of a Neurodevelopmental Assessment^[37] of the minor claimant was filed together with her kindergarten progress reports.^[38] The principal claimant maintained that the educational and support services her daughter required to address her XXXX XXXX XXXX XXXX XXXX XXXX XXXX diagnosis were not available in the Nigerian public educational system in urban areas including Port Harcourt and Benin City.

[67] The updated medical report of Dr. XXXX^[39] indicates that the principal claimant continues to suffer from XXXX XXXX XXXX XXXX XXXX XXXX XXXX XXXX. The principal claimant continues on XXXX XXXX XXXX XXXX XXXX XXXX XXXX and with counselling and psychotherapy. No report was provided from her current counselor or psychotherapist.

[68] The principal claimant described the absence of an affordable private or public health care as a major reason she could not live reasonably in either Port Harcourt or Benin City. Documents in the NDP indicate that citizens must pay for services such as healthcare and education. These difficulties affording healthcare and education affect all Nigerians.^[40] However, there is no documentary evidence produced that access to such treatment in Port Harcourt or Benin City would be unavailable or inaccessible.

[69] The principal claimant testified at the de novo hearing that despite the presence of a child, a prospective landlord in either location would perceive her to be a prostitute as a woman without a male partner or male family supporter.

[70] The documentary evidence indicates that rent can be steep in urban locations like Port Harcourt and Benin City where the cost of living is high. This increases the challenge for the principal claimant as the head of a female household without male support to obtain housing.^[41] A review of the NDP indicates that the picture for females living alone in the south is mixed although notably more positive than would be the case in the north, with the south offering greater opportunities for women of higher education and socio-economic status.

[71] Upon reviewing all of the evidence, I find that the proposed internal flight alternatives Benin City and Port Harcourt are not unduly harsh or objectively unreasonable.

[72] I find that Benin City and Port Harcourt provide a viable IFA (internal flight alternative) for the claimants.

[73] There is insufficient reliable evidence to suggest that the principal claimant's former common law partner or his extended family would have the reach or influence to locate the claimants in either internal flight alternative such that it would give rise to a serious possibility of persecution for the claimants or subject them personally to a risk to life, or a risk of cruel and unusual treatment or punishment, or a danger of torture.

[74] The claimants have not shown that in their personal circumstances in the proposed internal flight alternatives would be objectively unreasonable or unduly harsh.

CONCLUSION

[75] The claimants are neither Convention refugees nor persons in need of protection. Their claims are therefore rejected.

(signed) “James Waters”
James Waters

January 29, 2019
Date

- [1] Exhibit 1, Federal Court Record, Reasons and Decision (TB2-09244).
- [2] Exhibit 2, Order of the Honorable Mr. Justice XXXX XXXX XXXX XXXX, 2018.
- [3] Exhibit 3, Judgement and Reasons of Madam Justice XXXX XXXX XXXX XXXX XXXX XXXX XXXX XXXX XXXX XXXX XXXX.
- [4] Guideline 4: *Women Refugee Claimants Fearing Gender-Related Persecution: Update*, Guideline Issued by the Chairperson Pursuant to Section 65(3) of the *Immigration Act*, IRB, Ottawa, November 25, 1996, as continued in effect by the Chairperson on June 28, 2002, under the authority found in [section 159\(1\)\(h\)](#) of the *Immigration and Refugee Protection Act*.
- [5] Exhibit 1, Federal Court Record, Document 6.
- [6] Ibid., Document 8, pages 4-5.
- [7] Ibid., Document 7.
- [8] Exhibit 1, Federal Court Record, Document 9, pp. 16-17.
- [9] Ibid., Document 8, pp. 1-3.
- [10] Exhibit 5, pp. 2-4.
- [11] Transcript of Hearing held on November 14, 2017, pp. 8-9.
- [12] Exhibit 1, Federal Court Record, Document 8, pp. 7-9.
- [13] Ibid., Document 9, pp. 1-6.
- [14] Exhibit 5, pp. 129 -130.
- [15] Exhibit 5, Amended Narrative, p. 3, para. 8.
- [16] Exhibit 5, pp. 131-132.
- [17] Exhibit 5, p. 2, para. 2.
- [18] *Chunza Garcia, Juliana Andrea v. M.C.I.* (F.C., no. IMM-2856-13), Annis, August 29, 2014, [2014 FC 832](#), at para. 17.
- [19] Exhibit 1, Federal Court Record, Document 9, pp. 1-6.
- [20] Ibid., Document 8, pp. 7-9.
- [21] Exhibit1, Federal Court Record, Document 8, pp. 1-3.
- [22] Exhibit 4, National Documentation Package (NDP) for Nigeria (December 21, 2018), item 1.11, section 2.3.4.
- [23] Exhibit 4, NDP for Nigeria (December 21, 2018), item 2.1, section 6.
- [24] Ibid., item 5.3.
- [25] Ibid., item 5.28.

- [26] Ibid., item 5.12, section 3.1.
- [27] *Rasaratnam, Sivaganthan v. M.E.I.* (F.C.A., no. A-232-91), Mahoney, Stone, Linden, December 5, 1991. **Reported:** *Rasaratnam v. Canada (Minister of Employment and Immigration)*, 1991 CanLII 13517 (FCA), [1992] 1 F.C. 706 (C.A.).
- [28] *Ranganathan: M.C.I. v. Ranganathan, Rohini* (F.C.A., no. A-348-99), Létourneau, Sexton, Malone, December 21, 2000. **Reported:** *Ranganathan v. Canada (Minister of Citizenship and Immigration)*, 2000 CanLII 16789 (FCA), [2001] 2 F.C. 164 (C.A.).
- [29] Exhibit 4, NDP for Nigeria (December 21, 2018), item 1.7.
- [30] Exhibit 4, NDP for Nigeria (December 21, 2018), item 1.7.
- [31] Ibid., section 6.3.1.
- [32] Exhibit 5, pp. 1-4.
- [33] Jurisprudential Guides, Decision TB7-19851 (May 17, 2018), identified by the Chairperson under the statutory authority found in section 159(1)(h) of the *Immigration and Refugee Protection Act*. <https://irb-cisr.gc.ca/en/legal-policy/policies/Pages/jurisprudential-guides.aspx>.
- [34] Exhibit 4, NDP for Nigeria (December 21, 2018), item 1.6.
- [35] Ibid.
- [36] Exhibit 4, NDP for Nigeria (December 21, 2018), item 5.9.
- [37] Exhibit 5, pp 8-29.
- [38] Ibid., pp 30-36.
- [39] Exhibit 5, p. 129 -131.
- [40] Exhibit 4, NDP for Nigeria (December 21, 2018), item 12.6.
- [41] Ibid., item 5.9.