

The Acquisition of Nigerian Citizenship by Naturalization: An Analytical Approach

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Abstract: *Citizenship acquisition is a national matter which is mainly regulated by the domestic laws of sovereign nations. In Nigeria, for instance, citizenship matters are regulated by the 1999 Constitution of the Federal Republic of Nigeria, as amended. One of the three means of acquiring Nigerian citizenship is by naturalization. However, there are uncertain terms used by the said Constitution in stipulating the essential requirements that must be met before an applicant applying for citizenship by naturalization could have his or her application granted. The said terms relate to "useful contribution" and "good character". It is the position of this paper that these terms need to be made certain in order not to allow unnecessary ambiguity in a matter of national importance such as naturalization. Moreover, the requirement of the opinion of the Governor of the state in which the applicant is domiciled on whether the local community in which the applicant lives accepts him or her is a subjective requirement. Finally, it is certain from this research that of the three modes of acquisition of Nigerian citizenship, citizenship acquisition by naturalization is the most complex. There is need to remove the element of "Governor's opinion" in order to make it less political and more economical.*

I. Introduction

The acquisition of the citizenship¹ of Nigeria is predicated on three legal elements. These elements are blood based, marriage based and asset based. The Constitution of the Federal Republic of Nigeria of 1999, the basic legal instrument in the Nigerian legal system brokered the legal template on citizenship in Nigeria. An exploration of the basis on which the acquisition of citizenship in Nigeria is limited to the elements is an essential act capable of promoting greater development in Nigeria.

A citizen of a country is one that is accorded the right to belong to it by the laws of the country. A Nigerian citizen is one accorded the right to belong to Nigeria by the Constitution of Nigeria. The Constitution of the Federal Republic of Nigeria of 1999 provided in sections 25, 26 and 27 that a person can only become a citizen of Nigeria by birth, by registration or by Naturalization. These provisions exclude people who do not meet the requirements contained in them from becoming citizens of Nigeria.

Acquisition of Nigerian citizenship is different from the right of entry and domicile in Nigeria within a specified period of time. This right is, however, subject to the Nigerian Immigration Laws. This system of admittance into the territorial sovereignty of Nigeria is not a unique feature of the Nigerian Legal System, it is a common rule applicable to other legal systems of the world. Just as it is required in Nigeria that for any person who is a non-Nigerian to enter the territory of Nigeria, he must secure the visa to so enter from the consular mission of Nigeria in the person's country, so also is the requirement of visa before entry made a subsisting rule by other consular missions in the world². In addition to the consular permission of entry, a non-Nigerian wishing to come to Nigeria must of necessity fulfil the conditions stipulated by the Nigerian Immigration Laws.

Examining the Effect of Domicile on Naturalization

It is to noted, however, that the conditions³ to be met by a non-Nigerian who wishes to acquire Nigerian Citizenship through naturalization include that he must have domiciled in Nigeria for not less than (a) fifteen consecutive years or (b) fifteen years in aggregate. The aggregation of fifteen years shall begin to count the moment the applicant completed a year's domicile in Nigeria without any break in-between the twelve months making up the year. Failure to meet up with this singular requirement relating to (b) above, that is,

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1 Citizenship is a factor that facilitates receiving certain benefits which include litigational benefit. See Onagoruwa v. IBB & Another, "Cases and Materials on Human Rights in Nigeria", *Journal of Human Rights Law and Practice*, Vol.4, Nos.1,2,3, 1994, p.32.

2 In all African countries citizenship is construed as a formal legal status, neglecting the practical notions of the concept. See S. Tamake, "Gender Trauma in Africa: Enhancing Women's Link to Resources", *Journp.60.2004.,al of African Law*, Vol.48, No.1

3 Conditions are usually attached to acquisition of citizenship whether it relates to Nigerian, South African or any other nation. These conditions both arbitrary and discriminatory in nature. See African Files @ www.Africanfiles.org/article.asp?ID=22167.

fifteen years in aggregate defeats any application⁴ for a Nigerian citizenship routed through it. It is the base upon which the superstructure, that is, the aggregation of years relating to citizenship stands.

The above position is understandable because once the one-year continuous domicile is attained, the person intending to acquire the Nigerian citizenship may be going out of Nigeria at will but must ensure that he completes the fifteen years aggregate requirement within a period of twenty years. This technical requirement apparently relaxes the stringent rule of fifteen years consecutive or continuous domicile by giving the applicant wishing to take the opportunity of the requirement of fifteen aggregate years within a period of twenty years, five years leave of absence from Nigeria which may be taken consecutively or spaced out within a period of twenty years.

The effect of domicile⁵, therefore, on naturalization is that it facilitates citizenship by naturalization. It is a prime factor the absence of which can mar the chances of obtaining the grant of Nigerian citizenship by naturalization. The nature of domicile is immaterial to the grant. Therefore, whether a person applying for such a grant is a tenant or a landlord in Nigeria does not affect negatively his or her chances of receiving the grant predicated on his or her application. In the same vein, the 1999 Constitution is silent on the functional aspect⁶ of domicile in the acquisition of Nigerian citizenship. The domicile of a foreigner in Nigeria in order to carry out his functions in a multinational company or any other foreign body in Nigeria may come under scrutiny with the aim of deciding whether in that capacity he can include the number of years spent in the services of his employer in order to make up the fifteen years requirement of domicile before naturalization in Nigeria. Such a domicile, it is submitted, carries the same weight as that of a person who in his private capacity is domiciled in Nigeria at all material times. In other words, a former diplomat who wants to obtain Nigerian citizenship through naturalization can include the number of years he domiciled in Nigeria as a diplomatic envoy of his country in order to make up the fifteen (15) years domicile requirement attached to the acquisition of the Nigerian citizenship by naturalization⁷. It is not a sustainable argument to maintain that since he was then a diplomat representing his country in Nigeria that those years he served in the capacity of a diplomat should not be included in calculating the fifteen-year period of domicile. Since the 1999 Constitution does not place any such impediment on the way of applicants wishing to obtain the Nigerian citizenship through naturalization, it would amount to an act of injustice to deny such citizenship based on a rebuttable assumption that the years of functioning as a diplomat would not be counted while calculating the number of years such an applicant has spent in Nigeria.

The Need to Define the Phrase “Useful Contribution”

Having resolved the issues revolving around domicile, there is the need to emphasize at this point that the channel of bringing more people into the population of Nigerians through naturalization is an avenue of bringing only good adults characters to wear the Nigerian colour or acquire the citizenship of Nigeria⁸. Good infants or good minors do not have any constitutional right to apply for citizenship by naturalization⁹. The channel has no consideration for people who lack the intention or the desire to domicile in Nigerian. A mad person in a diplomat’s immediate family¹⁰, though has the backing of international law to domicile in Nigeria could be rightly adjudged to lack the clear intention of his desire to be domicile in Nigeria¹¹. It is to be noted that the purpose of domicile in the Nigerian constitutional context is to enhance the assimilation of the way of life of the indigenous community¹² by the citizenship applicant. This assimilation must not be apparent but as real as could positively affect the opinion of the Governor¹³ of a state about the sociability of the applicant. In addition to the sociability of the applicant, another important element is that an applicant for the grant of the Nigerian citizenship by naturalization must be an asset and not a liability to Nigeria. No notorious drug peddler,

4 The fixture of the fifteen-year rule is apparently not based on any objective outcome of a research approving of the duration as an indispensable factor in relation to the acquisition of citizenship. It is rather done based on a pre-meditated supposition.

5 Domicile is the bedrock of the acquisition of the Nigerian citizenship by naturalization. In other words, no alien can stay abroad and apply for a Nigerian citizenship by naturalization if the person fails to meet the requirement on domicile.

6 By functional aspect of domicile, it is meant domicile in Nigeria based on its need for a foreigner in Nigeria to stay in Nigeria in order to carry out the functions of his office. The people in this category are multinational companies expatriate workers, diplomatic envoys, consular officers and representatives of international organisations.

7 A person who acquires the Nigerian citizenship through naturalization or registration and who secures a ticket to represent his constituency in a legislative house may lose that position if he renounces the Nigerian citizenship. See S. 68(1)(c), CFRN, 1999. It is unlikely that he will lose the position or seat on the basis of dual citizenship because the Constitution permits dual citizenship. See S.28, CFRN, 1999. See also Article 16(2), Citizenship Act, 2000 of Ghana.

8 S.27(2)(6), CFRN 1999.

9 S.27(2)(9), CFRN 1999.

10 See Articles 27-30, Vienna Convention on Diplomatic Relations of 1961.

11 S.27(2)(c), CFRN 1999.

12 S.27(2)(d), CFRN 1999. Assimilation is a process of internalization of the norms, mores and values of a particular society and this helps in proper and effective adaptation of a person in any environment.

13 The opinion of a state is a purely subjective one. There is need to set a parameter of factors to be used as the base of the opinion formation on the part of the Governor.

terrorist, pirate or fraudster can acquire the grant. Any application for the grant can be quashed by a petitioner who proves that the applicant is a liability and not an asset to Nigeria. The litmus paper for testing the asset basis of naturalisation is whether the applicant has made or is capable of making useful contribution to the advancement, progress and well-being of Nigeria. The contribution stated here needs only to be useful. The silence on the general nature of “useful contribution” removes every reasonable doubt as per whether a mere suggestion, recommendation or advice given to the authorities of the government of Nigeria prior to the application for citizenship by naturalization suffices as a useful contribution. Taken from all standards of rationale judgement contribution can be in cash or in kind. Cash apart, kind remarks, about Nigeria at a time the international community is wondering whether Nigeria is on course or not, in terms of security and stability could serve as a useful contribution if such a remark becomes a basis for laundering Nigeria’s image abroad. The point is that until the constitution is amended to state in clear, unequivocal terms what it means by ‘useful contribution’¹⁴ all reasonable contributions could be placed on it without its veracity being impeached or successfully challenged.

The making of useful contributions shows a great level of commitment to the Nigerian project. The view that commitment to a cause shows an unquestionable acceptance of that cause is an average viewpoint that needs not be vehemently canvassed for before its general acceptance. Therefore, commitment to Nigeria as reflected in the making of useful contributions without any form of reservation or inhibition is a sign of acceptance of Nigeria unreservedly. Does such maker of useful contributions need any other proof to show his allegiance to Nigeria?

The Nature of Oath of Allegiance in Naturalization Affairs

The drafters of the 1999 Constitution thought it wise to include taking the oath of allegiance¹⁵ as one of the requirements for acquiring Nigerian citizenship by naturalization. The functional aspect of an oath is basically related to both morality and law. The moral angle is revealed by the fact that the oath binds the conscience to live up to the expectation of the oath. On the aspect of the law, it is trite law that going against an oath legally administered on a person could attract the wrath of the law. For instance, the crime of perjury is installed in the Nigerian Criminal Justice system in order to check the menace of lying under an oath. By swearing an oath, an individual places himself under the burden of speaking the truth and nothing but the truth. The burden referred to, here, means a legal burden which has a moral undertone. Attaching the string of oath of allegiance to the acquisition of citizenship does not carry much legal weight to the whole exercise. This assumption is sustained by the discovery that the oath of allegiance is only extracting from the oath taker a mere promise of being true and faithful to Nigeria. This, it is submitted, is different from the evidential oath administered to witnesses¹⁶ in court aimed at extracting the truth underlying the facts of a case from witnesses who come or are brought to give evidence in court in support of or against facts of the case. While, liars under this type of oath can be convicted and be sent to jail on the basis of perjury, those aliens who do not mean a single word among the words contained in the oath of allegiance may not face any such treatment. This doubt is founded on the basis that there is no provision in the said oath where the refrain to the effect that all that the oath of allegiance taker would say “would be the truth and nothing but the truth” is inserted. This omission¹⁷ is suggestive of the fact that there is no palpable intention on the part of the drafters of the 1999 Constitution to criminalize any failure on the part of the oath of allegiance taker who does not take the oath as serious as it is required.

Suffice it to say at this point that the constitutional stance on the oath of allegiance as a factor in considering an alien legible to acquire the Nigerian citizenship is that such oath taking is an imperative act and must not be dispensed with, otherwise the applicant for Nigerian citizenship would fail too have his application granted or the procedure for obtaining the citizenship fully complied with. The oath of allegiance is apparently aimed at forbidding an alien who takes up Nigerian citizenship from undertaking subversive actions against the territory, government and people of Nigeria. such subversive actions include spying activities which undermine the political independence, territorial integrity and corporate existence of Nigeria. Moreover, admitting people¹⁸

14 The term “useful contribution” as stated in S.27(2)(e) of the CFRN, 1999, is not defined in S.318 of the same Constitution. What is being awaited now is a judicial interpretation of the phrase so as to provide a clear guide to what constitute the phrase.

15 The Oath of Allegiance is an importation of religion into a secular state’s affair. However, it is submitted that this oath is ineffectual. Among the corrupt people who at one point or the other misused their offices to corruptly enrich themselves, it is not difficult to note that those of them that used their political offices to milk those that they lead dry despite the fact that they took one oath or the other before going into those political offices. See S.27(2)(f), CFRN 1999.

16 Every witness before a court of competent jurisdiction in Nigeria is subjected to a willing swearing of oath before his testimony would be acceptable to the court. Refusal to swear an oath on the basis of religion could be waived and the witness is allowed to affirm to the veracity of the testimony that he would be giving in court.

17 S.27’s requirement on oath taking makes it possible to cite intention as bring present in the Naturalization process, that the Nigerian citizenship is not forced upon the alien. Forced Naturalization, therefore, is an alien concept to the Nigerian Legal System.

18 Naturalization as a gateway into the Nigerian citizenship gives admittance to foreigners who wish to become Nigerians. The calibre of people who successfully pass through this gate would either be to the advantage or disadvantage of Nigerian interests.

who are not passionate about Nigeria's wellbeing and security would amount to consciously compounding the existing problems of Nigeria.

It is noteworthy to state that the applicants for Nigerian citizenship have by virtue of their applications shown a clear¹⁹ intention to become Nigerian citizens if their applications are granted. Intention is one of the elements required in order to grant citizenship to an alien subject of fulfilling other constitutional requirements such as possession of full²⁰ capacity, good character and obtaining of a favourable opinion of the Governor of the state where applicant proposes to be resident²¹. The phrase, "good character"²² is not expressly defined. It is left within the subjective interpretative ability of the president to whom the applications are addressed through the appropriate channel. A "good character" is a relative term which if left undefined could be interpreted to mean anything which serves better the interests of all those involved in one matter or the other relations to grant of the Nigerian citizenship to aliens.

Governor's Opinion and Citizenship by Naturalization

Another subjective element in the case of obtaining of Nigerian citizenship by naturalization relates to the opinion of the Governor of a state in which he is domiciles, on whether the local people in the community living in the Governor's state have accepted him and that the applicant has been integrated fully into the communal life of the people of that community²³. The opinion of the Governor, apart from being a subjective factor, may in the actual sense be the opinion of any of his commissioners, particularly that of Local Government and Chieftaincy Matters. In the light of the above fact, the opinion of the Governor may be adjudged to be an artificial act which does not provide any sufficient justification for its requirement by the 1999 Constitution. However, an applicant can challenge an unfavourable opinion of the Governor which bars him from being conferred with the right of being a citizen on the ground that the expressed opinion is an opinion other than that of the Governor on the ground that it is the Commissioner and not the Governor, as required by the law, that formed the opinion. This position could be argued against by maintaining that the Governor in question delegated his function²⁴ as it relates to the formation of the opinion to the commissioner. However, a counter argument that the 1999 Constitution did not contemplate the delegation of such power to any other person and as a result of this that such delegation of power is unconstitutional, null, void and of no effect whatsoever²⁵.

Marriage and Acquisition of Nigerian Citizenship

Marriage under the Nigerian Marriage Act is a union between a man and woman who are joined together by legitimate authorities to live as husband and wife. The 1999 Constitution made provisions for the acquisition of the Nigerian citizenship by alien women who get married to Nigerian men by virtue of registration²⁶. Again, a marriage related privilege in terms of the legitimate acquisition of Nigerian citizenship is extended to a person who is born outside Nigeria any of whose grandparents is from a tribe indigenous to Nigeria. In other words, where X, a Nigerian woman married to Y, a man of German nationality, gives birth to P who grew up later in Germany and married a German woman. The child of this later woman, a German by birth wishing to take up the nationality of Nigeria would be required to go by means of acquiring Nigerian citizenship by virtue of registration.

In the above cases all having to do with marriage, the person applying for citizenship by registration does two things conjunctively: applies for registration as a citizen of Nigeria and if application is granted, takes the oath of allegiance²⁷. This form of acquisition of the Nigerian citizenship on a comparative basis is less

¹⁹S.27(2)(c), CFRN 1999

²⁰ S.27(2)(a), CFRN 1999

²¹ S.27(2)(d), CFRN 1999

²²Character makes or mars a person. Therefore, character formation is an essential aspect of building a personality profile. The contents of character can help a person to get a visa or acquire citizenship, especially that of Nigeria. the difficulty presented by the requirement of good character endorsement by the president. Therefore, the good character concept may be misread to mean being in the president's good book.

²³ It is obvious from the requirement that the local community that accepts a foreigner must be ready to concede the foreigner the right to claim the community as the land of his nativity. In other words, the foreigner, if he acquires the citizenship by naturalization becomes a Nigerian who hails from the state of the Governor whose opinion on the foreigner is favourable and the community of people that have accepted him, even though he is not a person born in the Nigerian soil (*jus soli*).

²⁴ S.27, CFRN, 1999, is silent on the position that should be taken in the event of a Governor not being able to give his opinion but decides to delegate the act to any of his commissioners.

²⁵ This conclusion is based on the literal interpretation of the Constitution. It is to be noted that a judge is not bound to use this means of statutory interpretation. He could decide to use the Golden rule, the Mischief rule or any other rule of statutory interpretation to arrive at the conclusion favourable to the delegation of the power by a Governor to any of his commissioners.

²⁶ Registration as a means of acquisition of the Nigerian citizenship is very narrow. Unlike naturalization, it applies only to Married women who are married to Nigerian men.

²⁷ Citizenship by registration is less cumbersome when compared with that of naturalization; while that of birth is the easiest means of the acquisition of a Nigerian citizenship.

arduous and tasking than that of citizenship acquisition by naturalization. All that the applicant is concerned with is just to marry a Nigerian man, apply for citizenship and if granted, takes the oath of allegiance. In fact, citizenship acquisition is reflective of a certain progression in the continuum of demands or pre-requisites to be met before the grant of the Nigerian citizenship.

Less Complex Modes of Acquiring a Nigerian Citizenship

The demand for citizenship by birth²⁸ is the person to be born must be born by a Nigerian citizen, irrespective of gender and the location of the birth place must be either in Nigeria or outside Nigeria. In this type of acquisition of citizenship, there is no form of application required. Birth by a Nigerian is the basic factor that confers this right of Nigerian citizenship automatically. Even if the Nigerian parent of the citizen are living abroad, the automatic acquisition would not be encumbered by that fact. The same position to cases where one of the parents is a Nigerian living abroad with the spouse. The fact that a person is born a Nigerian is not the act of the beneficiary whether consciously or unconsciously. There is no exertion of the mental energy of the beneficiary who is simply born a Nigerian as regards writing an application seeking for acquisition of Nigerian citizenship by birth.

A different picture is presented in the case of citizenship by registration. There are higher demands for the acquisition of such citizenship. Unlike citizenship by birth²⁹, it is not automatic. There exists a conscious exercise of the mental faculty in order to acquire the citizenship right to become a Nigerian and the exercise in question relates to writing an application which is a form of tasking or exercising the mental faculty.

Further progression in terms of demands to be met before one acquires a Nigerian citizenship is seen in the case of citizenship by naturalization. This is the most complex form of citizenship acquisition in Nigeria. The community of people where the foreign applicant is domiciled, the State Governor of the state where the community is located and the President of the Federal Republic of Nigeria play major roles in conferring on a foreign applicant the right of Nigerian citizenship. Moreover, there are still requirements relating to long domicile of the applicant in Nigeria, having full capacity and having the intention to become a citizen of Nigeria.

From the foregoing, it could be seen that citizenship by birth is simple, to acquire, citizenship by registration is a bit complex; while citizenship by naturalization is cumbersome to acquire. The progression from a simple to a cumbersome mode of acquisition is sustained by what each of those citizens have at stake in relation to Nigeria. Citizenship by birth is blood related, that of registration is marriage related; while that of naturalization is environmentally and asset related³⁰. The blood, marital and environmental cum asset factors are the foundations on which citizenship in Nigeria is based.

Among the three factors, the one apparently controversial is the marital factor. It favours only married women and unnecessarily discriminates against married men³¹. In other words, an alien woman who gets married to a Nigerian man is qualified to applying for citizenship of Nigeria by registration. An alien man married to a Nigerian woman does not have the same privilege accorded to him. This discrimination has raised considerable dust in the reasoning of intellectuals, including jurists. It is submitted that the controversy is a reflection of merely the brewing and growing rivalry between the menfolk and womenfolk over who should be the head and who should be subservient to the other. While the men traditionally maintain that they are in charge and as such should rule over the women, the women on the one part, are not claiming superiority as the men do; all they claim is equality. This position has been on for a long period of time that even some men are beginning to be rational enough to accord to women what God the Almighty Father has accorded to all the

²⁸ It is to be noted that a person who acquires a Nigerian citizenship by birth can maintain a citizenship of another nation. However, if he renounces his Nigerian citizenship, he and his children may no longer be Nigerians, looking at it from a formal, legal angle. The Constitution of the Federal Republic of Nigeria, 1999 encourages dual citizenship. See S.28, CFRN, 1999. The 1995 Draft Constitution attempted to remove dual citizenship right but the 1999 Constitution beautifully gives attention and legitimacy to it.

²⁹ Citizenship by birth is automatic. It is the only basis of acquiring dual citizenship by a Nigerian. Ghana's Justice A. K. Acquah, a Supreme Court Judge, while delivering a paper, "Who is a Ghanaian? The Citizenship Perspective" in November 2003 said, among other things, that Ghana should look to an adoption of Nigerian's Dual Citizenship Act which ensures that the birth right citizenship of either a Nigerian or non-Nigerian is not lost on the acquisition of a foreign or Nigerian citizenship. See Dual Citizenship: Nigeria Points the Way to a Solution for Ghana @ www.ghanaweb.com/GhanaHomePage/features/artikel.php?ID=151921.

³⁰ Blood, marriage and environment are three solid foundations on which Nigerian citizenship rests. Blood (*jus sanguine*) is a factor considered by many countries in the devolution of the right of citizenship to those who are of the same blood with their parents. The children acquire the nationality or citizenship of their parents. Another factor, marriage is not as wide as that of blood (birth). Environment (*jus soli*) is another factor of citizenship that is applicable to other national jurisdictions.

³¹ In fairness to the men, the constitutional provision limiting acquisition of a Nigerian citizenship by registration only to alien women is discriminatory. If the denial of the same right to foreign men is based on security precaution, it holds no rational water because alien women who choose to be unscrupulous can be threats to the Nigerian security.

offspring of the human species which is equality of all human being with definable roles attached to gender. The roles did not display the superiority of the men and the inferiority of the women. The roles, simply speaking, are traditional assignments and nothing more. The “man as the head principle” is the divine assignment of roles to men to cater or fend for their families and be in charge as a moderator and not as an oppressor in family affairs and in the church of the living God. It is therefore wrong to perceive this assignment to be that which makes the man superior and the woman as inferior person haunted always by an inferiority complex³² whenever there is a mixture of an assembly or congregation on gender basis. This state of affairs have made enlightened women to rise up and question the status quo³³ and this feeling fanned the Beijing Women conference where the women declared an affirmative action relating to women with demands favourable to the womenfolk all over the world.

As a counter measure, the menfolk mounted a counter measure to whittle down the agitation of women who appear poised to take away the traditional roles of men in society³⁴. Since the women learnt to capitalize any loophole in treatment of society or the law to women to advance their cause, the men learnt the art also. Take for instance, the Nigerian Police Act requires that before an unmarried police woman would get married, she must have clearance from the Inspector-General of Police before she gets married. The women have been raising objection to this requirement or rule which is indeed reflective of strong pillar of discrimination mounted against the womenfolk. The unmarried male policemen are not required by the Law to get clearance from the Inspector-General of Police before getting married to women of their choice. As if looking for a way to get the pound of flesh from the boisterous women who champion the cause of women, every law that is inappropriately balanced in favour of the women is attacked with the same vigour of character that the women employ to champion their causes.

Considering however, the provision of the 1999 Constitution on the acquisition of citizenship by marital link of a woman to a Nigerian, one would be forced to change his position with regard to issues centering on women generally where such a one allows rational considerations to guide his attitudes to women. A foreign woman married to a Nigerian has come to stay in the husband’s land till death does them part. The likelihood of her remaining in Nigeria as a Nigerian is increased because of her posterity which has taken root in Nigeria. a foreign man getting married to a Nigerian woman is very likely to leave Nigeria with his Nigerian wife and children and return to the country of his nationality. It is worthy to note that the constitution does not foreclose the possibility of such a person becoming a Nigerian. Where he is serious in acquiring a Nigerian citizenship, he strives to qualify to meet up with the stringent constitutional provisions on citizenship acquisition by naturalization.

II. Conclusion

Citizenship by naturalization is an avenue for shopping for credible people to join the Nigerian citizenry. The cumbersome requirements and the political undertone inherent in the acquisition of such citizenship make this means of citizenship acquisition to look like a camel passing through the eye of a needle. The simpler modes of citizenship acquisition, to wit, those of birth and registration appear more beneficial than that of naturalization. For instance, citizenship by birth affords a person the opportunity of vying for the office of the President of Nigeria or that of the Governor of a State in Nigeria.

³² See the Holy Bible: Ephesian 5:25,30.

³³ The Beijing Affirmative Action, the CEDAN, the African Charter on Human and Peoples Charter, the Universal Declaration of Fundamental Humajn Rights and the Nigerian Constitution are sufficiently strong to chart a new course of perception and assignment of beneficial roles to women.

³⁴ These measures, in the Nigerian context, includes the non-passage of the Convention on the Elimination of all forms of Discrimination against Women into Law by the Nigerian National Assembly.