

THE INFLUENCE OF RELIGIOUS ORIENTATION ON PROFESSIONAL ETHICS AMONG NIGERIAN LAWYERS: A SOCIO-LEGAL AND PSYCHOLOGICAL ANALYSIS

Philip King Umaru Yashim*

Lawrence E. Anyia**

Abstract

The Nigerian legal profession faces an undeniable crisis of integrity, a dissonance particularly acute given the nation's profound religiosity. This scholarly analysis critically examines how the motivational basis of faith influences adherence to the stringent ethical standards set out in the Rules of Professional Conduct for Legal Practitioners, 2023 (RPC). This paper contends that the recurring archetypes of lawyer misconduct in Nigeria, such as fiduciary breach, financial misappropriation, and abuse of status, are direct behavioural outcomes of an Extrinsic Orientation. The article concludes by arguing that the expansive regulatory power to sanction conduct 'incompatible with status' is a necessary secular bulwark against the moral hazard created by this prevalent utilitarian faith, recommending targeted, psychologically informed pedagogical interventions to cultivate genuine, intrinsic moral integrity.

Keywords: Influence, Religious Orientation, Professional Ethical Conducts, Lawyers, Socio-legal, Psychological

* LL. B, BL, LL.M, B.Sc (Pub. Admin.), MPA, Dcotoral Candidate at the University of Jos). (Legal Practitioner and Researcher), Doxa Attorneys, Jos. Email: philipkingyashim@gmail.com

** LL. B, B.L, (Legal Practitioner and Researcher), Anyia and Co, Jos. Email: Anyia14@yahoo.com

1.0 INTRODUCTION

The Nigerian legal profession occupies an elevated status, with practitioners regarded as 'ministers in the temple of justice' expected to maintain the highest standards of professional conduct.¹ This professional standing is underpinned by the implied promise of expertise and moral rectitude.² Legal practitioners carry a variety of legal and moral obligations, including duties to the public and allegiance to a higher cause.³ Society views them as custodians of high moral values whose conduct should serve as a light to the rest of society.⁴

However, this elevated expectation exists within a paradox peculiar to Nigeria: a highly religious society grappling with pervasive professional misconduct. Nigeria ranks among the most religious nations globally, with Christianity and Islam commanding widespread adherence.⁵ Studies confirm that Nigerian Christians and Muslims share strong beliefs against corruption, with 88% viewing the private appropriation of government funds as unacceptable.⁶ Yet the profession continues to document high rates of egregious ethical failures, including the misuse of client funds and subversion of judicial processes.⁷ The Legal Practitioners Disciplinary Committee (LPDC) regularly adjudicates

¹S Udemezue, 'An Appraisal of Professional Legal Ethics and Proper Conduct for Lawyers in Nigeria' (2020) *SSRN Electronic Journal* 2 <DOI:10.2139/ssrn.3842835> accessed 13 December 2025

²ibid

³ibid

⁴ibid

⁵WC Emenike and MA Nwanyanwu, 'Legal Analysis of the Relationship of Law, Morality and Religion in Nigeria' (2023) 11(1) *AELN Journal of Environment & Natural Resources Law* 238

⁶C Hoffmann and T Patel, 'Corruption in Nigeria and the Role of Religion' (Chatham House Report 2021)

⁷A Aladekomo, 'Growing Cases of Lawyers' Misconduct in Nigeria and Corrective Measures' (2020) *SSRN Electronic Journal* 5 <<https://papers.ssrn.com>> accessed 13 December 2025

cases involving senior members of the Bar, including holders of the prestigious Senior Advocate of Nigeria (SAN) rank.

This crisis has prompted alarmed commentary from leadership within the profession. In December 2025, the Nigerian Bar Association (NBA) President, Afam Osigwe, publicly acknowledged growing concerns about senior lawyers' professional conduct, noting that confidence in the legal profession depends on swift investigation and discipline.⁸ Yemi Candide-Johnson lamented these growing concerns, stressing that leadership must begin with credible conduct and accountability. He recalled being asked whether senior advocates in Nigeria receive 'special training in deception, delay and diversion,' a perception he described as increasingly common.⁹

Odinkalu has characterised the phenomenon as one of 'Senior Advocates of No-Consequence,' arguing that senior lawyers' relationship with professional conduct rules appears governed by a 'Teflon rule of no consequence.'¹⁰ His critique extends to systemic failures within the Body of Benchers and the LPDC, which he suggests habitually lapse into 'a habit of no consequence' when encountering cases affecting senior lawyers.

The failure of religious identity alone to curb professional misconduct implies that simple adherence to a faith tradition is insufficient.¹¹ Deeper inquiry must focus on the motivational basis of faith, the psychological driver mediating the relationship between belief and

⁸O Dania, 'SANs raise alarm over senior lawyers' misconduct' Punch (Lagos, 4 December 2025)

⁹ibid

¹⁰CA Odinkalu, 'Senior Advocates of No-Consequence (SANs)' Vanguard (Lagos, 12 October 2025)

¹¹Hoffmann and T Patel (n 6)

ethical action, as the critical variable predicting compliance with the Bar's moral imperatives.

This analysis necessitates an interdisciplinary bridge between codified ethical duties and the psychological drivers of moral behaviour. Allport's Religious Orientation Scale (ROS) serves as the primary analytical tool for positioning religious adherence not merely as theological compliance, but as a fundamental psychological driver of ethical decision-making.¹² The ROS distinguishes individuals based on whether their faith is deeply personal and holistic (intrinsic) or pragmatic and self-serving (extrinsic). Later scholarship identified a third dimension, Quest orientation, measuring the degree to which individuals approach religious questions with intellectual openness, comfort with doubt, and willingness to revise beliefs.¹³

The persistent documentation of misconduct among Nigerian Bar members suggests their ethical conduct is heavily influenced by their religious orientation.¹⁴ The theoretical prediction is straightforward: practitioners with predominantly Extrinsic orientations will demonstrate compartmentalised ethics, maintaining public religious identities whilst engaging in self-serving professional misconduct when opportunities arise. Conversely, practitioners with predominantly Intrinsic or Quest orientations will demonstrate consistent ethics across domains, resisting temptations to compromise professional standards even when personal costs are involved.

¹²GW Allport and others, 'Intrinsic–Extrinsic Religious Orientation Scale' (1967) *Journal of Personality and Social Psychology* 1

¹³CD Batson and P Schoenrade, 'The Quest Scale to measure a third type of religious orientation' (1991) 30(4) *Journal for the Scientific Study of Religion* 1

¹⁴Allport and others (n 12)

2.0 THE NIGERIAN REGULATORY LANDSCAPE: RPC 2023 AND THE SCRUTINY OF CHARACTER

The regulatory framework imposes several key duties that define ethical practice. First, the relationship between a legal practitioner and a client is fundamentally a fiduciary one, which imposes the duty of 'utmost honesty and fairness'.¹⁵ Rule 23 explicitly governs 'Dealing with Client's Property,' mandating that a legal practitioner must promptly report and account for any money or property collected for a client, and shall not 'mix such money or property with, or use it as, his own'.¹⁶ The breach of this foundational duty, misappropriation of funds, is a clear manifestation of self-interest incompatible with the status of a legal practitioner.¹⁷

Second, the legal practitioner's primary allegiance is to the justice system, imposing duties that are 'paramount' over client interests.¹⁸ Rule 15 mandates that a legal practitioner shall not knowingly advise or aid a client to breach the law, file frivolous suits, or conceal facts required by law to be revealed.¹⁹ Rule 30 specifically requires every lawyer to refrain from doing 'any act or conduct in any manner that may obstruct, delay or adversely affect the administration of justice'.²⁰

In Nigeria, professional discipline is administered by the LPDC.²¹ Conduct warranting punishment falls into four categories under Section 12 of the LPA: (i) infamous conduct in any professional respect; (ii) being convicted of a crime incompatible with professional status; (iii) obtaining enrolment by fraud; or (iv) any act generally regarded as

¹⁵ Udemezue (n 1) 8

¹⁶ *ibid*

¹⁷ *ibid*; Aladekomo (n 8) 8

¹⁸ Udemezue (n 1) 8

¹⁹ *ibid*

²⁰ Odinkalu (n 13)

²¹ Udemezue (n 1) 22

incompatible with the status of a legal practitioner.²² Case law defines 'infamous conduct' as a 'serious infraction of acceptable standard of behaviour, or ethics of the profession, a conduct that is so disreputable and morally reprehensible as to bring the profession into disrepute if condoned or left unpunished'.²³

However, concerns about the efficacy of disciplinary enforcement persist, particularly regarding senior members of the profession. Candide-Johnson has observed that many lawyers believe disciplinary bodies often avoid sanctioning senior advocates, even in cases where misconduct is evident, creating a perception of 'no consequence' that undermines the rule of law.²⁴ Odinkalu's analysis reinforces these concerns, documenting how the Body of Benchers 'seems to lapse into a habit of no consequence' when it encounters cases affecting senior lawyers.²⁵ The NBA President has pointed to reforms underway, including a bill before the National Assembly aimed at strengthening the LPDC and enabling it to operate efficiently across various zones.²⁶

A crucial aspect of Nigerian professional regulation is the expansive moral mandate placed on legal practitioners, often referred to as the Membership Model.²⁷ This model subjects individuals to ethical scrutiny simply by virtue of being enrolled as a legal practitioner.²⁸ The legal basis for this broad scrutiny lies in the LPA, specifically through

²² *ibid*; MC Ogwezzy, 'The Legal Practitioners Act: A Code for Regulating the Conduct of Lawyers in Nigeria' (2013) 7(3) *Agora International Journal of Juridical Sciences* 111

²³ *Allinson v General Council of Medical Education and Registration* [1894] 1 QB 750; *Medical and Dental Practitioners Disciplinary Tribunal v Okonkwo* (2001) 7 NWLR (Pt 711) 206

²⁴ Dania (n 10)

²⁵ Odinkalu (n 13)

²⁶ Dania (n 10)

²⁷ Udemezue (n 1) 24

²⁸ *ibid*; Aladekomo (n 7) 8

the sanctioning of a legal practitioner who is 'convicted of any crime which is incompatible with the status of a legal practitioner,' with the LPA explicitly stating that this crime 'need not be committed in professional respect'.²⁹

Critics argue that the current law 'holds every act of a legal practitioner to a standard even where such an act was not done in a professional capacity,' suggesting reform to respect the 'thin line between a lawyer's professional and private life'.³⁰ However, the continued maintenance of this broad 'incompatible with status' mandate is essential to protecting public trust, particularly when viewed through the lens of psychological motivation. If a legal practitioner is guided primarily by an extrinsic motivation, they may deliberately compartmentalise their moral life, treating their professional role as a utilitarian tool for financial or social gain.³¹ The expansive rule is necessary to disrupt this moral compartmentalisation, protecting the profession from conduct rooted in a fundamental lack of moral integrity (Extrinsic orientation).³² From a religious orientation perspective, the Membership Model serves as necessary secular counterbalance to the moral compartmentalisation enabled by Extrinsic religiosity.³³

²⁹ Udemezue (n 1) 24

³⁰ 'Rules of Professional Conduct for Legal Practitioners 2023 Key Provisions' (n 17) 1; UG Ehirim and others, 'Emerging Cases of Professional Misconduct of Legal Practitioners in Nigeria: A Case for Law Reform' (2024) 4(3) *Indonesia Law Reform Journal (ILREJ)* 328

³¹ Allport and others (n 12) 1; Batson and Schoenrade (n 13) 1

³² Ehirim and others (n 30) 335

³³ Allport and others (n 12) 1

3.0 THE PSYCHOLOGICAL ARCHITECTURE OF RELIGIOUS MOTIVATION: ALLPORT, EXTRINSIC, INTRINSIC, AND QUEST

Gordon Allport developed the Religious Orientation Scale (ROS) to probe the deeper motivational structure of faith.³⁴ The ROS shifts the focus from asking what a person believes to asking how they hold that faith and why they are committed to it.³⁵ Allport's foundational insight was that identical doctrinal beliefs could serve radically different psychological functions for different individuals, for some, religion represented life's ultimate concern, whilst for others it served instrumental purposes such as social acceptance or anxiety reduction.³⁶

The Intrinsic Religious Orientation (I) represents a deep, holistic, and internalised faith.³⁷ For individuals scoring high on this dimension, religion is 'an end in itself'.³⁸ It functions as a singular 'master motive' that regulates and guides their entire life, resulting in consistent ethical behaviour across all domains.³⁹ For legal practitioners, the prediction is high ethical congruence. An Intrinsic orientation strongly reinforces the RPC's foundational mandates, particularly the duty of honesty and devotion to the client's interests.⁴⁰

The Extrinsic Religious Orientation (E), conversely, defines religion as a utilitarian tool, a 'means to achieve non-religious goals'.⁴¹ This orientation is pragmatic and self-serving, focusing on benefits such as

³⁴ *ibid*

³⁵ *ibid*

³⁶ *ibid*

³⁷ *ibid*

³⁸ *ibid*

³⁹ Neyrinck and others (n 25) 1

⁴⁰ Udemezue (n 1) 8; Neyrinck and others (n 39) 1

⁴¹ Allport and others (n 12) 1

comfort, security, or enhanced social status.⁴² The Extrinsic orientation is further subdivided into two dimensions: Extrinsic-Personal (EP) refers to the use of religion for psychological safety, comfort, or relief from fear,⁴³ whilst Extrinsic-Social (ES) refers to the use of religion as a medium contributing to social relationships and achieving social status.⁴⁴

The ethical prediction for legal practitioners with high Extrinsic orientation is moral rationalisation and opportunism. Their adherence to professional ethics is contingent upon whether compliance serves their personal material (EP) or social (ES) objectives.⁴⁵ Since the extrinsic individual views professional rules and even religious precepts as secondary to material gain, they are highly susceptible to ethical failure, such as financial misconduct, which aligns directly with the goal of self-security and comfort (EP).⁴⁶ Similarly, the misuse of professional status (e.g., abusing the rank of SAN) aligns with the pursuit of social status (ES).⁴⁷

A third dimension is the Quest (Q) orientation, which measures the extent to which an individual approaches existential questions and meaning with intellectual openness and the positive acceptance of doubt and complexity.⁴⁸ Quest-oriented individuals view religious questions as genuinely open, embrace doubt as productive, and demonstrate willingness to revise beliefs in light of new evidence or experience.⁴⁹ In a legal system prone to corruption and characterised by a perceived

⁴² *ibid*

⁴³ Batson and Schoenrade (n 23) 1

⁴⁴ *ibid*

⁴⁵ Allport and others (n 12) 1

⁴⁶ Aladekomo (n 8) 8

⁴⁷ Allport and others (n 12) 1; Udemezue (n 1) 24

⁴⁸ Batson and Schoenrade (n 23) 1

⁴⁹ *ibid*

'culture of impunity',⁵⁰ this orientation is crucial. It promotes independent judgement and empowers legal practitioners to reject both dogmatic legalism and systemic corruption.⁵¹

4.0 MAPPING ETHICAL FAILURE: RELIGIOUS ORIENTATION AND EPITOMES OF MISCONDUCT AMONGST NIGERIAN LEGAL PRACTITIONERS

The patterns of professional misconduct frequently documented in Nigeria demonstrate alignment with the psychological predictions of Allport's Religious Orientation Scale. The archetype of fiduciary breach, involving the 'stealing and misappropriation of client funds,' is one of the most 'odious and disagreeable' conducts, posing a direct threat to public order and the profession's reputation⁵² and has become increasingly common in the 21st century Nigerian Bar.⁵³

These breaches are foundational violations of Rule 23, which prohibits co-mingling or conversion of client funds, and the fiduciary duty of honesty.⁵⁴ In *Moji Olamolu v The State*,⁵⁵ the appellant legal practitioner converted funds intended for death benefits, resulting in a criminal conviction. The Court of Appeal described the legal practitioner's conduct as 'greedy, sad and Satanic,' noting that she allowed herself to be destroyed by greed despite the fiduciary relationship of 'absolute trust'.⁵⁶ This pattern of self-destructive behaviour for short-term material benefit perfectly exemplifies the Extrinsic-Personal orientation's prioritisation of immediate comfort and

⁵⁰ 'Culture of Impunity in Nigeria' (DCAR Thesis 2018) 1

⁵¹ Batson and Schoenrade (n 23) 1

⁵² Udemezue (n 1) 24.

⁵³ Aladekomo (n 8) 8.

⁵⁴ Udemezue (n 1) 8.

⁵⁵ (2013) 2 NWLR (Pt 1339) 580.

⁵⁶ Udemezue (n 1) 24; Aladekomo (n 8) 6.

security over long-term integrity.⁵⁷ Similarly, the LPDC struck a legal practitioner off the roll in the case of *NBA v Chikwendu Kalu*,⁵⁸ for converting ₦1.2 million received from a petitioner for a land transaction to personal use.

Further evidence of this orientation is found in *Charles Okike v The Legal Practitioners Disciplinary Committee*,⁵⁹ where the appellant failed to remit approximately US \$123,000 to a Japanese client. Despite seven summonses, the appellant refused to appear before the LPDC, instead using technical letters to challenge procedural validity. The Supreme Court upheld striking his name from the roll, emphasising that the profession demands high honour and strict fiduciary responsibility. This attempt to use technicality to avoid moral accountability reflects profound absence of intrinsic integrity. The case of *Eke Umazi Ndukwe v LPDC*,⁶⁰ further illustrates the EP orientation where even small sums are withheld. The appellant recovered ₦25,000 for a 'frail old widow' but refused to pay it for two years, even as she made multiple trips from Cameroun to Nigeria to demand it. The Supreme Court held that holding client money without justification after demand is infamous conduct, refusing clemency.

The second major archetype involves abuse of professional status, including bribery, subversion of court processes, and leveraging high ranks to secure unmerited outcomes. This behaviour fundamentally violates Rule 30.⁶¹ Candide-Johnson has highlighted instances of misconduct and obstructionism, recounting an arbitration in which a

⁵⁷ Allport and others (n 12) 1; Batson and Schoenrade (n 13) 1

⁵⁸ (2015) 17 NWLR (Pt 1487) 198

⁵⁹ (2005) 15 NWLR (Pt 949) 471

⁶⁰ (2007) 5 NWLR (Pt 1026) 1

⁶¹ Udemezue (n 1) 28

foreign presiding arbitrator expressed deep disappointment at a well-known Nigerian Senior Advocate's conduct.⁶²

In *Michael K Aondoakaa v Emmanuel Bassey Obot*,⁶³ the appellant, whilst serving as Attorney-General of the Federation, used his office to counsel disobedience to final Court of Appeal judgements. The Supreme Court described this as 'criminal abuse of office' and 'desecration of the office of the AGF,' ruling him unfit for public office. This demonstrates how ES orientation allows practitioners to view themselves as 'above the law' by virtue of rank. The underlying driver is Extrinsic-Social motivation—pursuing status (SAN rank, AGF office) primarily for social recognition.⁶⁴ When professional rules impede status maintenance, especially in high-stakes cases, Extrinsic legal practitioners' resort to corrupt or manipulative means.⁶⁵

Similarly, in *Incorporated Trustees of Nigerian Bar Association v Tupere Bruno*,⁶⁶ the respondent acted beyond client instructions by receiving ₦38,125,000 into his personal account and releasing title documents without consent. He withheld over ₦19 million, claiming it was for legal fees and payments to 'traditional land owners' never agreed upon. The LPDC noted he improperly engaged in estate agency, bringing the profession into 'public ridicule.' Finally, *Nigerian Bar Association v Dominic E Ntiero*,⁶⁷ involved a respondent who issued a dud cheque for ₦6.3 million and confessed to funding litigation himself without prior agreement. He then used judicial process to file counter-suits to delay obligations. The LPDC struck him off the Roll, associating his conduct with 'ethics of tested conmen' driven by 'greed and rapacity.'

⁶² Dania (n 10)

⁶³ (2022) 5 NWLR (Pt 1824) 523

⁶⁴ Allport and others (n 12) 1; Batson and Schoenrade (n 13) 1

⁶⁵ Udemezue (n 1) 26; Aladekomo (n 8) 19

⁶⁶ (2024) 3 NWLR (Pt 1926) 551

⁶⁷ (2013) 18 NWLR (Pt 1386) 431

A particularly egregious recent case that exemplifies both ES orientation and systemic enforcement failure is the case of *Ms. Tali Shani v Chief Mike Agbedor Abu Ozekhome*.⁶⁸ The case presents a complex intersection of legal impropriety and personal relationships, elucidated by the UK First-tier Tribunal’s judgment in September 2025. Central to this matter was the attempt by Chief Mike Ozekhome, SAN, to register a London property which the Tribunal determined was actually owned by the late General Jeremiah Useni (Retired), a former Minister of the Federal Capital Territory and former Senator of the Federal Republic of Nigeria, registered under a false identity.⁶⁹ Consequently, the Tribunal directed the Chief Land Registrar to cancel Ozekhome’s application, as the purported transferor, “Mr. Tali Shani” lacked any valid title to convey.⁷⁰

Crucially, in paragraphs 200 to 202 of the tribunal judgment, the tribunal clarified the nature of Ozekhome’s involvement with the true owner. Judge Ewan Paton found that General Useni, as the beneficial owner, must have 'directed' the transfer and was on 'good terms' with the Respondent.⁷¹ The Judge explicitly stated there was 'no question' of Ozekhome attempting to 'steal' the General’s property.⁷² While the precise motive remained unclear—whether arising from 'friendship and

⁶⁸ [2025] UKFTT 01090 (FC)

⁶⁹ *ibid* [214], [207].

⁷⁰ *ibid* [198].

⁷¹ *ibid* [200].

⁷² *ibid*.

generosity' or a 'debt or favour'—the Tribunal concluded that the decision to transfer the property was General Useni's, although that, it was not the case of the Respondent before the tribunal.⁷³

However, from the tribunal's findings also, ethical tension arises in paragraphs 203 to 207 of its judgment, where the Tribunal found the 'elaborate evidence' used to justify the transfer to be an 'invention and contrivance.'⁷⁴ Despite the lack of intent to defraud the General, the 'fluctuating' and 'implausible' testimony regarding the consideration paid (vacillating between legal fees and gifts)⁷⁵ suggests a breach of the Rules of Professional Conduct for Legal Practitioners (RPC) 2023, specifically Rule 1 (Integrity) and Rule 32 (Candour).⁷⁶

Viewed through Gordon Allport's Extrinsic orientation,⁷⁷ Ozekhome's conduct reflects a utilitarian approach to professional standards—using fabricated narratives to secure a legal outcome, even where the underlying intended gift may have been genuine. This 'strained credibility'⁷⁸ risks the 'international embarrassment' of the Nigerian Bar,⁷⁹ highlighting how an extrinsic orientation prioritises personal gain

⁷³ *ibid* [202].

⁷⁴ *ibid* [206].

⁷⁵ *ibid* [203]–[204].

⁷⁶ Rules of Professional Conduct for Legal Practitioners 2023, (n 17) rr 1, 32.

⁷⁷ GW Allport, *The Individual and His Religion* (Macmillan 1950).

⁷⁸ *Shani v Ozekhome* (n 68) [204].

⁷⁹ Onikepo Braithwaite, 'Ozekhome and the Triple Faces of Tali Shani' *ThisDay* (Lagos, 23 September 2025).

over the intrinsic master motive of honesty required by the legal profession.⁸⁰

5.0 THEORETICAL SYNTHESIS AND THE PATH TO ETHICAL RESONANCE

The empirical reality of high misconduct rates amongst legal experts, despite the pervasive presence of strong religious beliefs, supports the conclusion that the problem is not a deficit of faith, but the dominance of a utilitarian, Extrinsic faith.⁸¹ This psychological orientation creates a profound moral hazard. Instead of serving as a master motive for moral action (Intrinsic), religion functions as a social accessory, a source of comfort (EP) or a platform for status (ES).⁸²

The Nigerian context presents particular features that may facilitate Extrinsic religious orientation. The nation's religious marketplace is highly competitive, with churches and mosques often emphasising material prosperity, social success, and psychological comfort as divine blessings.⁸³ Prosperity theology, prevalent in many Nigerian Christian denominations, explicitly frames faith as means to material success, potentially reinforcing EP orientation.⁸⁴

Understanding the relationship between religious orientation and social values in Nigeria becomes critical in this context. As Yashim observed in his seminal study, investigating this relationship is crucial because it helps to suggest the psychological religious orientations needed to conscientise Nigerians of the real values embedded in their religions,

⁸⁰ Udemezue (n 1) 26

⁸¹ Hoffmann and Patel (n 7) 1

⁸² Allport and others (n 12) 1; Batson and Schoenrade (n 13) 1

⁸³ Emenike and Nwanyanwu (n 6) 3; Hoffmann and Patel (n 7) 1

⁸⁴ Hoffmann and Patel (n 7) 1

which, if imbibed, will go a long way in improving social values thereby minimising the social ills prevalent in society.⁸⁵ This underscores the urgent need for proper psychological religious orientation amongst stakeholders in national issues, including legal practitioners, political leaders, and public office holders.⁸⁶

Furthermore, the intertwining of religion with Nigerian national life creates both opportunities and challenges for professional ethics. Notable examples include the enshrinement of Sharia Law provisions in the 1999 Constitution of the Federal Republic of Nigeria (as amended) and the enactment of Sharia Law in some Nigerian states.⁸⁷ Additionally, some states organise and sponsor celebrations of religious festivities with state funds, whilst national and local politicians regularly invite clerics to endorse their positions on issues or perform prayers before legislative meetings and other public functions.⁸⁸ This bidirectional exchange between religious organisations and the state demonstrates how deeply religion penetrates public life in Nigeria, reinforcing the argument that having stakeholders in political, public, economic, and social sectors, including the legal profession, with proper religious orientation would enable the country to experience genuine positive social change.⁸⁹

The necessity for the LPDC's expansive jurisdiction under the LPA is clarified by this psychological synthesis. Since pervasive Extrinsic motivation often leads to moral failures that might occur outside the

⁸⁵ PK Yashim, 'Influence of Religious Orientation on Social Values: The Nigerian Experience' (Advanced Diploma thesis, Department of General and Applied Psychology, University of Jos 2005)

⁸⁶ *ibid*

⁸⁷ *ibid*

⁸⁸ *ibid*

⁸⁹ *ibid*

strict scope of professional duty,⁹⁰ the LPDC's power to sanction conduct 'incompatible with the status of a legal practitioner'⁹¹ steps in to address this moral gap. The LPDC effectively functions as a secular mechanism, compensating for the failure of religious institutions to cultivate Intrinsic morality.⁹² However, as the documented cases demonstrate, this enforcement mechanism has been undermined by a pattern of selective application that creates the very 'no consequence' culture it is meant to prevent.⁹³

Compliance mechanisms based solely on fear of sanction are inherently unstable.⁹⁴ Sustainable, high-quality ethical conduct requires a fundamental shift in motivational structure toward internalised values (Intrinsic) or critical moral engagement (Quest).⁹⁵ Therefore, any meaningful strategy to address the ethical crisis must move beyond conventional policing to incorporate pedagogical interventions rooted in motivational psychology.⁹⁶ Continuing Legal Education (CLE) programmes must be strategically utilised to help legal practitioners recognise and critically evaluate their own motivational drivers, actively fostering an Intrinsic commitment to the foundational Rule 1 mandate.⁹⁷

⁹⁰ Udemezue (n 1) 24

⁹¹ *ibid*

⁹² Hoffmann and Patel (n 7) 1; Udemezue (n 1) 24

⁹³ Odinkalu (n 13)

⁹⁴ 'Ethics Etiquette and Navigating Ethical Precepts in Legal Practice in Nigeria' (Gamzaki Law Chambers, legal blog, 2023) 1

⁹⁵ Udemezue (n 1) 56; Neyrinck and others (n 39) 1

⁹⁶ 'Ethics Etiquette and Navigating Ethical Precepts in Legal Practice in Nigeria' (n 94)

1

⁹⁷ Udemezue (n 1) 56

6.0 RECOMMENDATIONS

a. Recommendations for the LPDC and Regulatory Bodies

Based on the evidence that extrinsic motivation is the root cause of moral compromise, LPDC adjudications should be deliberately structured to diagnose and punish the underlying moral turpitude that indicates fundamental unfitness for practice.⁹⁸ Sanctions should focus acutely on actions involving dishonesty, breach of trust, misappropriation of client funds, and outright fraud, regardless of whether these actions were committed in the face of the court or outside of it.⁹⁹

The LPDC should develop explicit sentencing guidelines that treat character-based misconduct (particularly involving dishonesty or breach of fiduciary duty) as warranting severe sanctions approaching or including permanent disbarment.¹⁰⁰ As Candide-Johnson has emphasised, professional discipline 'must start with senior lawyers,' and the perception that disciplinary bodies avoid sanctioning senior advocates must be decisively addressed.¹⁰¹ The documented pattern wherein senior advocates receive effective immunity from consequences, as illustrated by the Aondoakaa and Ozekhome, cases, represent existential threat to the profession's credibility and must be reversed through transparent, consistent enforcement regardless of professional rank.¹⁰²

⁹⁸ *ibid* 22; Ogwezzy (n 22) 111

⁹⁹ Udemzue (n 1) 24

¹⁰⁰ Ogwezzy (n 33) 112

¹⁰¹ Dania (n 10)

¹⁰² Odinkalu (n 13)

Law reform proposals advocating for the premature limitation of the LPDC's scrutiny (the Functionality Model) should be rejected.¹⁰³ Given the documented prevalence of Extrinsic orientation and moral compartmentalisation, maintaining the broad 'incompatible with status' mandate under the LPA is a necessary, albeit imperfect, bulwark against further ethical erosion.¹⁰⁴ However, maintaining broad jurisdiction requires corresponding procedural protections ensuring fairness and preventing arbitrary enforcement.¹⁰⁵ The LPDC should develop clear guidance on what constitutes conduct 'incompatible with status,' providing practitioners with reasonable notice of prohibited behaviour whilst maintaining sufficient flexibility to address novel forms of misconduct.¹⁰⁶

b. Recommendations for Integrating Motivational Psychology into Continuing Legal Education

The professional ethics curriculum within CLE must be substantially reformed to move beyond rote instruction of the rules toward addressing the source of moral decision-making.¹⁰⁷ This involves integrating motivational psychology and studies on religious orientation (Intrinsic, Extrinsic, and Quest) to equip legal practitioners with the self-awareness to recognise and critically evaluate their own motivational drivers.¹⁰⁸ The NBA has underlined its efforts to train lawyers on professional conduct, anti-money laundering, and the prevention of their use in

¹⁰³ 'Rules of Professional Conduct for Legal Practitioners 2023 Key Provisions' (n 17) 1

¹⁰⁴ Ibid; Ehirim and others (n 30) 328

¹⁰⁵ Ogwezzy (n 33) 111

¹⁰⁶ *ibid*

¹⁰⁷ Udemezue (n 1) 56

¹⁰⁸ 'Ethics Etiquette and Navigating Ethical Precepts in Legal Practice in Nigeria' (n 94) 1

subverting justice, indicating organisational readiness for more psychologically sophisticated approaches.¹⁰⁹

Specific curriculum components should include foundational modules on moral psychology explaining how motivational orientations shape ethical decision-making in professional contexts.¹¹⁰ The integration of psychological insights into religious orientation within professional ethics training responds directly to the need identified by Yashim for proper psychological religious orientation amongst stakeholders in national issues, recognising that such orientation is essential for achieving meaningful reform in professional conduct.¹¹¹

Case study analyses examining documented misconduct through religious orientation framework would help practitioners understand how Extrinsic motivations facilitate specific failure patterns.¹¹² The documented cases of senior advocates operating under a 'no consequence' regime provide particularly instructive examples of how Extrinsic orientation, when coupled with institutional failures in enforcement, creates systemic ethical degradation.¹¹³ Reflective exercises prompting practitioners to examine their own motivational structures and identify personal vulnerabilities to ethical compromise should form a core component of reformed CLE programmes.¹¹⁴

Such curriculum development requires collaboration between the Nigerian Bar Association, academic institutions with expertise in moral psychology, and experienced practitioners demonstrating exemplary

¹⁰⁹ Dania (n 10)

¹¹⁰ Allport and others (n 12) 1; Batson and Schoenrade (n 13) 1

¹¹¹ Yashim (n 85).

¹¹² Aladekomo (n 8) 8.

¹¹³ Odinkalu (n 13).

¹¹⁴ Udemezue (n 1) 56.

ethical conduct.¹¹⁵ Pilot programmes should be rigorously evaluated to assess effectiveness in shifting practitioners' motivational orientations and improving ethical decision-making, with successful approaches then scaled across the profession.¹¹⁶

c. Recommendations for Professional Community Development and Religious Engagement

Practical strategies for fostering Intrinsic and Quest orientations extend beyond formal CLE to encompass broader professional community development initiatives. Mentorship programmes pairing junior practitioners with seniors demonstrating consistent ethical conduct would provide role models of integrated professional identity.¹¹⁷ As Candide-Johnson has urged, senior lawyers must model ethical behaviour and mentor juniors to safeguard the integrity of the judiciary.¹¹⁸

Recognition programmes publicly honouring practitioners demonstrating exceptional ethical conduct would create status incentives aligned with principle rather than opposed to it. Candide-Johnson has reminded the profession that wealth and prominence are invitations to responsibility, not proof of leadership, calling for humility, historic purpose, and renewed commitment to ethical practice.¹¹⁹

The Nigerian Bar Association should also engage with religious institutions, encouraging them to emphasise Intrinsic rather than

¹¹⁵ 'Ethics Etiquette and Navigating Ethical Precepts in Legal Practice in Nigeria' (n 94) 1.

¹¹⁶ Udemezue (n 1) 56.

¹¹⁷ 'Ethics Etiquette and Navigating Ethical Precepts in Legal Practice in Nigeria' (n 94) 1.

¹¹⁸ Dania (n 10)

¹¹⁹ *ibid*

Extrinsic dimensions of faith in their teaching and community life.¹²⁰ Religious leaders could be enlisted as partners in professional ethics education, helping practitioners understand how authentic religious commitment supports rather than conflicts with professional integrity.¹²¹ Given that religion is deeply intertwined in Nigerian national life, with religious organisations exercising considerable influence over political and social issues,¹²² strategic collaboration between the legal profession and religious institutions becomes essential. Such collaboration recognises that if stakeholders in political, public, economic, and social sectors, including the legal profession, possess proper religious orientation, Nigeria can experience genuine positive social change.¹²³

d. Recommendations for Future Research

Quantitative studies employing the Religious Orientation Scale with samples of Nigerian legal practitioners could empirically test the hypotheses advanced here, determining actual prevalence rates of Intrinsic, Extrinsic, and Quest orientations within the profession and their correlation with disciplinary outcomes.¹²⁴ Longitudinal research tracking practitioners from law school through early career could identify how professional socialisation processes shape motivational orientations and whether targeted interventions during legal education successfully cultivate more Intrinsic or Quest-oriented approaches.¹²⁵ Intervention research rigorously evaluating pedagogical programmes designed to shift motivational orientations could provide evidence-based guidance for CLE curriculum development and demonstrate

¹²⁰ Emenike and Nwanyanwu (n 6) 5; Hoffmann and Patel (n 7) 1

¹²¹ Neyrinck and others (n 39) 1

¹²² Yashim (n 85)

¹²³ *ibid*

¹²⁴ Allport and others (n 12) 1; Batson and Schoenrade (n 13) 1

¹²⁵ Udemezue (n 1) 56; 'Ethics Etiquette and Navigating Ethical Precepts in Legal Practice in Nigeria' (n 94) 1.

whether such interventions produce measurable improvements in ethical conduct.¹²⁶

7.0 CONCLUSION

The Nigerian legal profession stands at a critical juncture in its institutional development. Decades of documented ethical failures have progressively eroded public trust and undermined the profession's capacity to fulfil its constitutional role as guardian of justice.¹²⁷ Traditional approaches emphasising rule elaboration and enhanced sanctions have proven insufficient, as they address symptoms rather than underlying causes.¹²⁸ Odinkalu's characterisation of Senior Advocates of No-Consequence operating under a Teflon rule of no consequence; captures the existential crisis confronting the profession's governance structures.¹²⁹

This analysis has established that religious affiliation provides insufficient protection against professional misconduct, as demonstrated by Nigeria's combination of high religiosity and high corruption rates.¹³⁰ The critical variable determining ethical conduct is how practitioners hold their faith and what psychological functions it serves.¹³¹ Practitioners with Extrinsic orientations, using religion instrumentally for comfort or status, demonstrate vulnerabilities to ethical failure when opportunities align with self-serving motivations.¹³² Conversely, practitioners with Intrinsic or Quest

¹²⁶ Udemezue (n 1) 56.

¹²⁷ Aladekomo (n 8) 5.

¹²⁸ Ehirim and others (n 30) 335

¹²⁹ Odinkalu (n 13).

¹³⁰ Hoffmann and Patel (n 7) 1.

¹³¹ Allport and others (n 12) 1

¹³² Aladekomo (n 8) 8

orientations demonstrate greater resilience, experiencing duties as consonant with personal commitments.¹³³

The analysis demonstrates that the most damaging standards of misconduct; fiduciary breach (Rule 23 violation), abuse of power, and corruption; are the direct behavioural outcomes of an Extrinsic Religious Orientation, where loyalty to personal gain and social status overrides the sworn duty to justice and truth.¹³⁴ This psychological mechanism explains why financial theft and abuses of power are so prevalent: they are the rationalised outcomes of an underlying Extrinsic motivation that violates the profession's core commitment to honesty and fiduciary duty.¹³⁵

Meaningful reform requires confronting uncomfortable truths about how religion functions psychologically within Nigerian society and specifically within the legal profession.¹³⁶ The nation's profound religiosity represents potential asset or liability for professional ethics depending on whether that religiosity takes Intrinsic/Quest or Extrinsic forms.¹³⁷ Religious institutions and professional bodies must collaborate to ensure that faith serves as genuine moral compass rather than convenient social accessory.¹³⁸

The path forward requires sustained commitment to psychological insight, pedagogical innovation, and principled regulation.¹³⁹ The LPDC must maintain its moral mandate whilst ensuring fairness and

¹³³ Neyrinck and others (n 39) 1

¹³⁴ Udemezue (n 1) 24; Ehirim and others (n 30) 325

¹³⁵ Udemezue (n 1) 24

¹³⁶ Emenike and Nwanyanwu (n 6) 5

¹³⁷ Allport and others (n 12) 1; Batson and Schoenrade (n 13) 1

¹³⁸ Hoffmann and Patel (n 7) 1; Udemezue (n 1) 56

¹³⁹ Udemezue (n 1) 56

must enforce standards consistently regardless of professional rank.¹⁴⁰ The Nigerian Bar Association must develop continuous legal education (CLE) programmes that address motivational foundations of ethical conduct.¹⁴¹ Legal educators must prepare new practitioners with psychological tools for resilience alongside technical legal skills.¹⁴²

Ultimately, the profession's ethical health depends upon individual practitioners' willingness to engage in difficult self-examination, honestly assessing whether their professional identities reflect genuine commitment to justice or merely utilitarian pursuit of wealth and status.¹⁴³ This analysis provides conceptual tools for that examination and roadmap for institutional reforms supporting it.¹⁴⁴ The question remaining is whether the profession possesses sufficient collective will to undertake this challenging but essential transformation.¹⁴⁵

¹⁴⁰ Udemezue (n 1) 24; Odinkalu (n 13)

¹⁴¹ 'Ethics Etiquette and Navigating Ethical Precepts in Legal Practice in Nigeria' (n 97) 1

¹⁴² Udemezue (n 1) 56

¹⁴³ Udemezue (n 1) 56

¹⁴⁴ *ibid*

¹⁴⁵ Aladekomo (n 8) 5