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AI-Powered Impersonation and the Urgent Case for Governance in Nigeria

A Policy and Legal Commentary | Oluwabukunmi Kolawole

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In early 2026, deepfake videos circulated on Facebook falsely depicting Ibukun Awosika and Ngozi Okonjo-Iweala endorsing investment platforms neither had ever approved.¹ Fela Durotoye's image was similarly weaponized without his consent.² Most recently, a 2023 interview given by media entrepreneur Mo Abudu at the Forbes 30/50 Summit in Abu Dhabi was manipulated using AI to alter her voice and message, falsely suggesting she endorsed a scheme promising extraordinary daily returns.³ These are no longer random incidents, but rather, a pattern that reflect symptoms of a deepening structural problem which requires urgent legal response.

THE ANATOMY OF A NEW KIND OF HARM

To understand why AI governance is urgent, it is important to understand precisely what is being weaponized.

Deepfake technology relies on a class of artificial intelligence called generative adversarial networks (GANs) and audio synthesis tools to clone voices from seconds of audio and synchronize fabricated speech to real video footage. The results are often indistinguishable from reality to an ordinary viewer. Research published in 2025 found that humans correctly identify deepfake content only about 55% of the time, meaning people are fooled by nearly half of all deepfakes they encounter.⁴

In Nigeria, the fallout is already visible across several fronts:

1. Ibukun Awosika and Ngozi Okonjo-Iweala: Africa Check, 'Guide to Scam Trends: Watch Out in 2026,' africacheck.org.

2. Fela Durotoye deepfake: [instagram.com/reel/DP4TaOhjKIM/](https://www.instagram.com/reel/DP4TaOhjKIM/)

3. Mo Abudu: QED.ng, 'My Voice Was Altered — Mo Abudu Says Over Viral AI Video'; eelive.ng; [instagram.com/p/DYSzozwDGFg/](https://www.instagram.com/p/DYSzozwDGFg/)

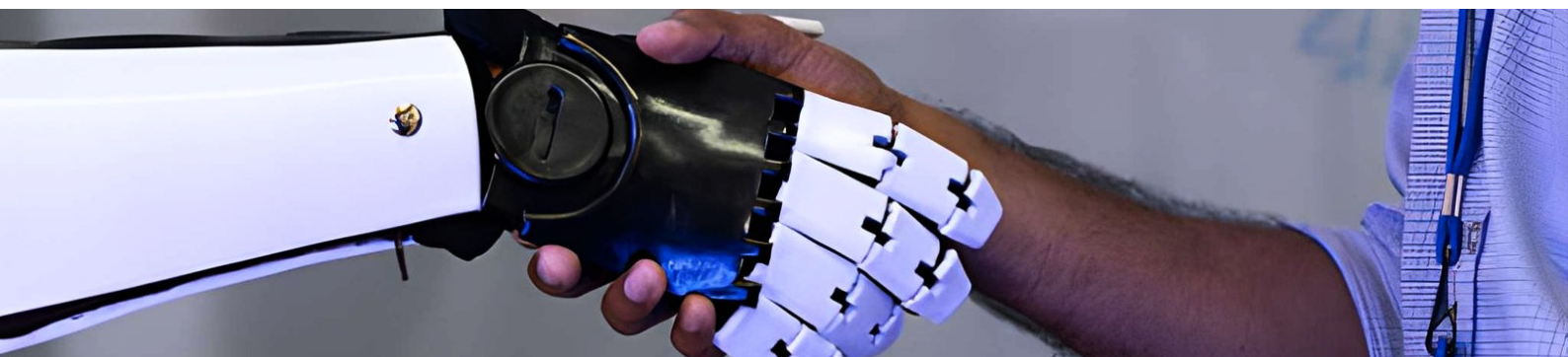
4. Human Behavior and Emerging Technologies (Wiley, 2025), meta-analysis of 56 studies; Pindrop, 2025 Voice Intelligence and Security Report.

Financial Fraud: In September 2025, Nigeria's Securities and Exchange Commission issued a formal warning about a rise in AI-driven investment scams built around fabricated celebrity endorsements.⁵

Medical Misinformation: In June 2025, the Advertising Regulatory Council of Nigeria (ARCON) raised a formal public alarm after they identified deepfake videos falsely showing Pastor Enoch Adeboye endorsing an unproven cancer cure, and journalist Seun Okinbaloye promoting an erectile dysfunction product.⁶

Political Manipulation: A fabricated video of President Tinubu, putting words in his mouth about purchasing a Premier League football club illustrated how easily a sitting head of state's words could be fabricated.⁷

Together, these episodes touch on fraud, defamation, violations of personal dignity, and consumer deception; harms that Nigeria's existing legal tools, including its criminal statutes and its cybercrime were never designed to address in an environment where artificial intelligence can manufacture convincing evidence out of nothing.



LAW'S RELATIONSHIP WITH TECHNOLOGY

Law draws its legitimacy from its responsiveness to the conditions it governs. It is not a static body of rules and is obliged to respond with comparable urgency when the underlying social and technological conditions shift structurally.⁸

As current realities would have it, generative AI has shifted the meaning of crucial legal elements such as consent, the nature of evidence, and the economics of fraud. In the face of such substantive technological change, adapting the law has become necessary.

5. SEC Nigeria, public statement on AI-driven investment fraud, 28 September 2025. Punch: punchng.com/sec-warns-nigerians-against-ai-driven-investment-scams/

6. ARCON public notice, 13 June 2025. Fact Check Africa, 'Deepfake Deception,' 15 June 2025.

7. TechCabal, 'Preparing for Nigerian Elections in a World of AI Deepfakes,' 28 August 2025.

8. Nature/Humanities and Social Sciences Communications, 'AI Governance in a Complex and Rapidly Changing Regulatory Landscape' (September 2024); Jindal Global Law Review (December 2025).

The Global Regulatory Response

Nigeria does not need to build a framework from first principles, a substantial body of comparative regulatory experience already exists, and the most credible approaches share common features worth closely studying.

The **European Union's AI Act (2024)** takes a risk-based approach. Article 50 imposes a binding transparency obligation on anyone deploying AI systems that generate deepfakes, requiring that manipulated or artificially generated content be clearly disclosed as such. Penalties for non-compliance can reach €35 million or 7% of a company's global annual turnover, whichever is higher.⁹

Singapore runs two parallel mechanisms. The Protection from Online Falsehoods and Manipulation Act (POFMA) allows authorities to issue correction orders and takedown notices for deepfake misinformation that affects public interest or national security, backed by fines of up to SGD 1 million. Separately, amendments to the Penal Code criminalize identity theft carried out through synthetic media, and 2024 amendments to Singapore's electoral law which was effective January 2025, prohibits publishing AI-generated or manipulated content about election candidates.¹⁰

Denmark has proposed granting individuals a copyright-like right in their own likeness. Within Africa, Kenya introduced an AI Bill addressing synthetic media in February 2026, while Rwanda and South Africa are finalizing their own frameworks, and Egypt, Angola, and Morocco have each adopted national AI strategies with governance provisions built in. The global regulatory landscape, in short, is moving quickly.

9. EU AI Act, Article 50 and Articles 99–101. MEIG Programme, 'Deepfakes and Human Rights,' December 2025.

10. Singapore: POFMA; Penal Code amendments; electoral law amendments effective January 2025. IAPP, 'Artificial Illusion,' April 2025.



NIGERIA'S LEGISLATIVE MOMENT

Against this global backdrop, what effort has Nigeria made towards a codified AI governance framework?

Nigeria's journey began in 2021 with the Artificial Intelligence and Robotics Research Regulatory Agency Bill, which lapsed without completing its legislative cycle¹¹. In 2023, the National AI and Robotics Sciences Bill and the Control of Usage of Artificial Intelligence Technology Bill both received first readings in the House of Representatives. A National Artificial Intelligence Regulatory Authority Bill followed in 2024. By December 2024, all bills introduced between 2021 and 2024 were consolidated and progressed to second reading.¹²

In 2024, Nigeria published its National AI Strategy under National Information Technology Development Agency (NITDA) and National Centre for Artificial Intelligence and Robotics (NCAIR). However, the Strategy functions more as a policy roadmap identifying four AI risk categories.¹³

The most significant development to date is the **National Digital Economy and E-Governance Bill 2025**, expected to receive presidential assent in 2026. It would make NITDA a super-regulator empowered to classify AI systems by risk, mandate algorithmic transparency, and require annual impact assessments for high-stakes applications in finance, public administration, and surveillance with penalties of up to ₦10 million or 2% of their annual revenue for non-compliance.¹⁴ NITDA's Director-General, Kashifu Abdullahi, has captured the intent well: regulation, he has said, is not just about issuing commands, it is about shaping market, economic, and societal behaviour so that people build AI for good. The remaining challenge is not ambition. It is execution.

11. IAPP (Victoria Adaramola, Tech Hive Advisory), 'Nigeria Moves Toward Comprehensive AI Regulation,' 8 April 2026.

12. Ibid.; fmino.gov.ng, House of Representatives plenary proceedings, 22 November 2023.

13. NITDA/NCAIR, National AI Strategy, August 2024. ncair.nitda.gov.ng

14. Bloomberg, 'Nigeria Set to Pass Sweeping AI Rules for Digital Economy,' 13 January 2026; Tech Hive Advisory, 'Nigeria: A 2025 Retrospective and 2026 Outlook,' December 2025; Weetracker, 13 January 2026.

What the Framework Must Address

Whatever form the final legislation takes, six elements should be treated as foundational:

1. **Direct prohibition** on non-consensual creation and distribution of AI-generated content impersonating real individuals;
2. **Mandatory** labelling of all synthetic media;
3. **Clear platform accountability** and obligations for detection, takedown, and user protection;
4. **Explicit consent** requirements before any person's voice, image, or likeness is used to train AI systems;
5. **Accessible legal Remedies for Victims.** Accessible legal pathways for victims to seek redress, with the NDPC's mandate extended expressly to AI-specific harms; and
6. **A risk-based classification system** that places deepfake fraud targeting consumers and public figures at the highest tier of regulatory scrutiny.

CONCLUSION

Legal systems have always had to absorb structural technological shifts — telecommunications, the internet, transportation, etc. Each produced a crisis of governance that the law eventually caught up to. Artificial intelligence demands the same response, delivered with more urgency than the last: it requires that our law makers and regulators identify the rights at stake, name the harms that violate them, assign responsibility to those with the power to prevent those harms, and attach real consequences for those who cause them.

Nigeria is the most populous nation in Africa, and has the largest economy in sub-Saharan Africa. Its strategic interest in getting this right in order to protect its citizens and establish itself as a credible digital market for global investment is enormous. The legislative materials exist. The institutional architecture exists. What remains is the political will to act before the gap between the technology and the law becomes a generational project to close.



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