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Origins and Interpretation of Nigerian Press Laws

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Abstract

The paper traces colonial legacies in Nigeria's press laws. Specifically, it traces the early antecedents of the Public Officers (Protection Against False Accusation) Decree No. 4 of 1984 and finds that it was modelled after earlier libel and sedition laws and the Newspaper Amendment Act, all of which criminalize free speech and opinion directed against those in authority. The study finds similarities in the motivations behind the promulgation of Decree No. 4 and those behind the earlier libel and sedition laws, i.e. fear of those in authority of criticism. Although Nigerian courts were reluctant to uphold individuals' rights of free speech and opinion shortly after independence, the study finds that later court decisions have found sections of the criminal code and sedition laws which criminalize free speech to be anachronistic and unconstitutional.

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Origines et Interprétations des Lois Régissant la Presse au Nigéria

Résumé

Cet article analyse les effets de l'héritage colonial au sein des lois régissant la presse au Nigéria. Il se penche plus particulièrement sur les antécédents de la fonction publique (Protection contre les Fausses Accusation), Décret No. 4 de 1984 et trouve qu'il était conçu sur le model antérieur des lois sur l'étiquette et la sédition ainsi que sur l'Edit d'amendement relatif à la presse écrite, qui tous considèrent comme crime la liberté d'expression et d'opinion dirigées contre les autorités. L'article établit des similitudes entre les motivations qui conduisent à la promulgation du Décret No. 4 et celles qui ont conduit à l'édition antérieure des lois sur l'étiquette et la sédition, telle que l'appréhension des critiques par les autorités. Bien que les tribunaux nigériens aient hésité à valider la Charte des droits individuels sur la liberté d'opinion et d'expression immédiatement après l'indépendance, l'enquête révèle que les décisions ultérieures des tribunaux avaient trouvé anachroniques et inconstitutionnelles des sections du code criminel et des lois sur la sédition qui sanctionnent comme criminelles la liberté d'expression et d'opinion.

Introduction

The 1960s witnessed the height of nationalist movements that culminated in the political independence of many African countries. But almost three decades after those political emancipations, the questions remain: How much have post-independence African governments borrowed from the colonial statute books in shaping contemporary African press laws? How have the courts interpreted those laws?

Nigeria became independent on October 1, 1960, and is used in this paper as a case study. The paper specifically examines the Public Officers (Protection Against False Accusation) Decree No. 4 of 1984 because most of its provisions are found in nearly all post-independence press laws enacted before it. The law has been described as the 'amalgam of all press laws enacted in post-independence Nigeria'.¹ The paper also examines how the courts have ruled on selected cases involving the press.

Public Officers (Protection Against False Accusation) Decree No. 4, 1984

Drafted on March 29, 1984, Decree No. 4 was the most dreaded, most repressive and the last press law enacted in Nigeria. It was promulgated during the military regime of Major General Buhari which did not take kindly to press criticisms. The law was drafted to punish authors of false statements and reports that exposed the Buhari administration and or its officials to ridicule or contempt. Section 1, sub-sections (i), (ii) and (iii) of the law – the most formidable section – provided that:

Any person who publishes in any form, whether written or otherwise, any message, rumour, report or statement, being a message, rumour, statement or report which is false in any material particular or which brings or is calculated to bring the Federal Military Government or the Government of a state or public officer to ridicule or disrepute, shall be guilty of an offence under this Decree.

Any station for wireless telegraphy which conveys or transmits any sound or visual message, rumour, report or statement, being a message, rumour, report or statement which is false in any material particular or which brings or is calculated to bring the Federal Government or the Government of a state or a public officer to ridicule or disrepute, shall be guilty of an offence under this Decree.

It shall be an offence under this Decree for a newspaper or wireless telegraphy station in Nigeria to publish or transmit any message, rumour, report or statement which is false in any material particular stating that any public officer has in any manner been engaged in corrupt practices or has in any manner corruptly enriched himself or any other person (*Gazette*, 1984).

The law also conferred on the Head of State the power to ban a newspaper and to revoke the license of a wireless telegraph station in any part of the federation

if such action was construed to be in the interest of the nation. Section 2, sub-sections (i) and (ii) of the law provided that:

Where the Head of the Federal Military Government is satisfied that the unrestricted circulation in Nigeria of a newspaper is or may be detrimental to the interest of the federation or any part thereof, he may by order published in the *Gazette*, prohibit the circulation in the federation or in any part thereof, as the case may require, of that newspaper; and, unless any other period is prescribed in the code, the prohibition shall continue for a period of twelve months unless sooner revoked or extended, as the case may require.

Where the Head of the Federal Military Government is satisfied that the unrestricted existence in Nigeria of any wireless telegraphy station is detrimental to the interest of the federation or any part thereof, he may by an order published in the *Gazette* (a) revoke the license to such wireless telegraphy station under the provisions of the Wireless Telegraphy Act of 1961; or (b) order the closure or forfeiture to the Federal Military Government, as the case may be, of the wireless telegraphy station concerned (*Gazette* 1984).

The law also provided that offending journalists and publishers be tried by a military tribunal composed of three members of the armed forces and a serving or retired High Court judge. The tribunal's ruling could not be appealed in any court. Section 8 of the press law specified punishments for offenders, and provided for a prison term of up to two years without the option of a fine. In the case of news media corporations, the decree provided for a fine of not less than 10,000 naira (Ogbondah, 1986).

Rationale for the Law

What was the motive of Decree No. 4? Why was such a dreadful law enacted? One possible reason was to stave off adverse criticism of the government, especially criticism that could suggest that Major General Buhari, the Head of State, or any member of his cabinet was corrupt. Buhari was aware of the rumour that spread when he came to power after toppling the government of President Shehu Shagari that he was corrupt just like the civilian politicians he had overthrown. It was alleged that he corruptly enriched himself when he was a state military governor and also knew about the disappearance of 2.8 billion naira in oil revenue allegedly missing when he was the federal minister for petroleum.

Buhari's awareness of the rumour and his concern about the effect of the rumour regarding the 2.8 billion naira oil money scandal, could be seen from his reference to the scandal during his first interview as Head of State. During that interview, Buhari robustly defended his dealings as oil minister. He said that a section of the press was merely crying wolf over the issue, and reiterated that no money was lost. He said:

If there was no judicial inquiry in 1979 when I was in the U.S. War College, I would have been brought up and lynched because someone said that 2.8 billion naira was missing in a place I was for three and a half years, and where I quarrelled with friends

and everybody because they thought there was so much money, but I refused them access to it. Somebody just got up one day and said money was missing. . . . But every body wanted to believe we stole that money (*National Concord*, 1984)

The Head of State certainly had little or no doubt that someone might insinuate in the press that he was corrupt, especially when memories were still fresh of press insinuation that former Head of State, General Murtala Muhammed was corrupt.² In that instance, a university law lecturer who was also the editor-in-chief of a news magazine, accused the former Head of State of corruptly enriching himself prior to coming to power. Major General Buhari's concern that someone might make similar insinuation in the press about him, and/or members of the cabinet, became more apparent as the fleeing politicians he deposed from office alleged that the in-coming military rulers were as corrupt as the civilians they overthrew.

Colonial Roots

Where are the origins of the Public Officers (Protection Against False Accusation) Decree? An examination of colonial documents and statutory provisions regulating the Nigerian press reveals that the roots of this press law are clearly found in the colonial period of Nigerian journalism history.

Fragments of the law can be found in the early newspaper laws of Nigeria. One of such laws was the Seditious Offences Ordinance of 1909 which, like Decree No. 4 of 1984, criminalized the publication of false reports or statements that exposed a government official or the government itself to ridicule or contempt. Published in September 1909 in the official *Gazette* and reprinted in an extraordinary issue of the government *Gazette* dated October 1, 1909, the Seditious Offences Ordinance under Sections 3 and 5, provided that:

Whoever by words, either spoken or written . . . brings or attempts to bring into hatred or contempt . . . the government established by law in Southern Nigeria, shall be punished with imprisonment which may extend to two years or with a fine or with both imprisonment and fine.

Whoever makes, publishes or circulates any statement, rumour or report, with intent to cause, or which is likely to cause any officer of the Government of Southern Nigeria or any person otherwise in the service of His Majesty to disregard or fail in his duty as such officer or servant of His Majesty . . . shall be punished (*Gazette*, 1909).

The above provisions clearly show that Section 1, sub-section (i) of the 1984 press law was modelled after the 1909 newspaper law.

Section 6 of the Seditious Offences Ordinance empowered police, magistrates and district commissioners to check seditious publications in their areas of authority by requiring suspected offenders to execute a bond, to be of good conduct for one year or for such a period as the police, magistrate or district

commissioner would be satisfied with the alleged offender's behaviour and conduct.

The event that precipitated the 1909 newspaper law was Herbert Macaulay's publication of a pamphlet titled, 'Governor Egerton and the Railway.' The pamphlet levelled charges of maladministration against the governor and drew attention to allegations of corrupt practices in the Egerton administration. Concern about the effects of unrestricted press criticism led to the drafting of a law based on the Indian Penal Code:

which would allow reasonable freedom of discussion of government policy but which would give the government power to punish publications . . . designed to influence an excitable and ignorant populace the bulk of whom are absolutely under the control of Headman [sic] and chiefs who themselves have only recently emerged from barbarism and are still actuated by the old traditions of race (Omu, 1968).³

The language and provisions of Section 8, sub-section (i) of Decree No. 4 of 1984 are similar to those of Section 3 of the 1909 colonial newspaper law. That section of the 1984 newspaper law provided for a prison term of up to two years for convicted offenders of the law – the same provisions found in the colonial law. The 1984 press law merely differed slightly from its colonial primogenitor in the sense that it (Decree No. 4) provided no option of fine for convicted persons. Apart from this difference, Decree No. 4 of 1984 provided for the exact terms of punishment as the 1909 colonial Seditious Offences Ordinance. Therefore, it could be argued that the Public Officers (Protection Against False Accusation) Decree No. 4 of 1984 was a rebirth of the premier colonial press law.

Fragments of the roots of Decree No. 4 can also be found in other colonial statutory provisions. One of those statutes was the 1916 Criminal Code which removed the option of fine found in the 1909 law for the publication of false reports. In the 1916 Criminal Code, false publication was defined as any 'statement, rumour or report likely to bring any public officer to disrepute . . .' (*Gazette*, 1916). The same phrase appeared in Section 1, sub-sections (i) and (ii) of the 1984 law enacted to control freedom of the press in Nigeria. In addition to this similarity, the draftmanship of Section 6, sub-section (i) of Decree No. 4 of 1984 was exactly the same as that of the 1916 colonial Criminal Code in the sense that it provided no option of fine for anyone convicted of disseminating false rumour, report or statement. In this sense, it can be logically concluded that the origins of Section 9, sub-section (i) of the 1984 press law are found in the 1916 Criminal Code of Nigeria.

A revised version of the Criminal Code of 1942 prohibited the importation into Nigeria of any newspapers or other publications considered undesirable in the interest of the country. Section 2, sub-section (i) of Decree No. 4 authorized the Head of State to prohibit the circulation in Nigeria of any newspapers if such prohibition was desirable in the interest of the federation. That section stipulated that: 'Where the Head of the Federal Military Government is satisfied that the

unrestricted circulation in Nigeria of a newspaper is . . . detrimental to the interest of the federation . . . he may . . . prohibit the circulation . . . of the newspaper . . . ' (Gazette, 1984).

Although this section did not empower the government to prohibit the importation of newspapers into the country, its intent on prohibition of newspaper circulation within the country is nevertheless the same as that of the 1942 colonial Criminal Code. The colonial press law prohibited newspaper importation into the country, while the post-independence press law prohibited the circulation of newspapers within the country under the same condition as in the 1942 law. The provisions of both laws are the same, and any difference is but a matter of rhetoric. Section 2, sub-section (i) of the 1984 press law is but an extension of some of the provisions of the 1942 colonial statutory provisions.

The roots of Decree No. 4 of 1984 can also be observed in the revised Criminal Code of 1958. Section 51 of that law provided that:

Any person who does or attempts to do, or makes any preparation to do, or conspires with any person to do, any act with a seditious intention; utters any seditious words; prints, publishes, sells, offers for sale, distributes or reproduces any seditious publication, unless he has no reason to believe that it is seditious; shall be guilty of an offence and liable on conviction for a first offender to imprisonment for two years or to a fine of 100 pounds or both and for a subsequent offence to imprisonment for three years...(*Times International*, 1985).

The provisions of Section B, sub-section (i) of Decree No. 4 of 1984 were modelled after Section 51 of the 1958 colonial law. That section of Decree No. 4 stated that: 'Any person found guilty of an offence under this Decree shall be liable on conviction to be sentenced to imprisonment for a term not exceeding two years . . . in the case of a body corporate, to a fine of not less than 100 naira' (Gazette, 1984).

The roots of the Public Officers (Protection Against False Accusation) Decree No. 4 of 1984 are more clearly found in a newspaper law of the defunct Eastern Nigerian Government enacted during the colonial administration of the country. Passed in 1955, the law was designed to regulate the publication and distribution of newspapers in the former Eastern region. It provided for the registration of newspapers, with their correct titles and names, the correct names of their proprietors together with their occupations and places of residence, the names of their editors, news-agents and correct addresses of where they were published. More importantly, the law went beyond registration and bonding by providing for the regulation of editorial content of newspapers:

Any person who publishes or reproduces or circulates for sale in a newspaper any statement, rumour or report knowing or having reason to believe that such statement, rumour or report is false shall be guilty of an offence and liable upon conviction to a fine of two hundred pounds or to imprisonment for one year.

It shall be no defence to a charge under this section that he did not know or did not have reason to believe that the statement, rumour or report was false unless he proves that prior to publication, he took reasonable measures to verify the accuracy of such statement, rumour or report (*Gazette*, 1955).

As can be noted, the language of Section 1 sub-section (i) and (ii) of Decree No. 4 resembled that of the 1955 newspaper law which regulated editorial content. The above section of the 1955 colonial press law in the former Eastern region became the model for the press laws of the other regions and the federation. For example, the law found its way into chapter 81 of the Western Nigerian Newspaper Law of 1957 and section 23 of the Northern Nigerian Penal Code. It was also incorporated into the Newspaper Amendment Act of 1964 which affected the whole country. According to an explanatory memorandum in the official *Gazette* in which the Act was published, the 1984 law was intended to 'bring the law relating to newspapers as printed or published in Lagos more into line with newspaper legislation in operation elsewhere in Nigeria' (*Gazette*, 1964). The provisions of Section 4 of this Act are phrased in the manner of the 1955 newspaper law of Eastern Region of Nigeria, and provides that:

Any person who authorizes for publication, publishes, reproduces or circulates for sale in a newspaper any statement, rumour or report knowing or having reason to believe that such statement, rumour or report is false shall be guilty of an offence and liable on conviction to a fine of two hundred pounds or to imprisonment for a term of one year.

It shall be no defence to a charge under this section that he did not know or did not have reason to believe that the statement, rumour or report was false unless he proves that, prior to publication, he took reasonable measures to verify the accuracy of such statement, rumour or report . . . (*Gazette*, 1964).

The roots of the Newspaper Amendment Act – passed in September 1964, four years after the attainment of independence – can be clearly traced to the 1955 colonial press law of the Eastern region. Though the provisions of Decree No. 4 of 1984 resembled those of the 1964 federal newspaper law, its strongest roots are found in the colonial press laws, suggesting that the 1984 press law, like other post-independence press laws, was obviously a carry-over from colonial statutory provisions.

Role of Judiciary

In most societies, courts interpret laws and judges are regarded as the arbiters between governors and the governed. The importance of a vigorous judiciary was not lost on Nigeria's Attorney-General and Justice Minister, Bola Ajibola, when he stated that the success or otherwise of a constitution depended to a great extent on the virility of the legal system (*West Africa*, 1987). Sylvanus Ekwelie (1986)

believes that occasional judicial activism might provide a stronger bulwark against press harassment than statutory guarantees.

Constitutional Provision

According to Section 24 of the 1960 independence constitution, Section 25 of the 1963 republican constitution and Section 36 of the 1979 constitution, every Nigerian is entitled to freedom of expression including freedom to hold opinions and to receive and impart ideas and information without interference. These rights are, however, almost qualified out of existence. For example, Section 36, sub-section (iii) of the 1979 constitution states:

Nothing in this section shall invalidate any law that is reasonably justifiable in a democratic society (a) for the purpose of preventing the disclosure of information proffered in confidence, maintaining the authority and independence of the courts or regulating telephone, wireless broadcasting, television or the exhibition of cinematograph films, or (b) imposing restrictions upon persons holding office under the State, members of the Armed Forces of the Federation or members of the Police Force.

Section 41 of the same constitution states:

Nothing in section 34, 35, 36, 37 and 38 of the constitution shall invalidate any law that is reasonably justifiable in a democratic society in the interest of defense, public safety, public order and public morality.

These qualifications are broad enough to be used to prevent or gag any expression of opinion that the government considers unpalatable. And that is where judicial independence becomes the citizens' last line of defense.

Three cases decided during the first civilian, military and second civilian administrations, and involving press laws will be examined to assess how the courts interpreted the laws.

Trial of Chike Obi

In 1961, Dr. Chike Obi, leader of the minority Dynamic Party, published a pamphlet, *The People: Facts That You Must Know*, part of which read, 'Down with the enemies of the people, the exploiters of the weak and the oppressors of the poor . . . the days of those who have enriched themselves at the expense of the poor are numbered.' He was charged with sedition. Many people thought the government over-reacted. Nwabueze (1973) believes Obi's attack on the government was a campaign rhetoric 'intended simply to induce the people not to vote for it at the next election.' The trial court, nevertheless, found Obi guilty.

Obi's appeal provided the Supreme Court the opportunity to rule whether the human rights provisions of the constitution invalidated and/or modified the sedition law. But the nation's highest court dismissed the case. Chief Justice Sir Ademola said:

A person has a right to discuss any grievance or criticize, canvass and censure the acts of Government and their public policy. He may even do this with a view to affecting a change in the party in power or to call attention to the weakness of a Government, so long as he keeps within the limits of fair criticism. It is clearly constitutional by means of fair argument to criticize the Government of the day. What is not permitted is to criticize the Government in a malignant manner as described above, for such attacks by their nature, tend to affect the public peace (Okonkwo and Naish, 1964).

Amakiri Affair

On July 30, 1973, the *Nigerian Observer* published a story by its Port Harcourt correspondent, Minere Amakiri, on the grievances of Rivers State's teachers. The teachers had threatened to go on strike unless their demands were met. Amakiri was arrested and detained for 27 hours in the guard room of the State House in Port Harcourt. His hair and beard were shaved off and he was given 24 strokes with a cane. An aide to the Rivers state governor explained that the story embarrassed the governor because its publication coincided with the governor's birthday celebration. The veracity of Amakiri's report was never challenged or in doubt.

Amakiri sued and was awarded 10,760 naira damages in 1974. The trial judge, Ambrose Allagoa, remarked before passing judgment that 'in spite of the military rule, the fundamental rights touching personal liberty, freedom of movement, right to property, freedom of conscience are still provided in the constitution' (Onagoruwa, 1976). Justice Allagoa also described the courts as the watchdogs of those rights. According to him, the courts 'will spare no pains in tracking down the arbitrary use of power where such cases are brought before the court' (Onagoruwa, 1976).

But the question is: How can the courts protect the rights of Nigerians when judges are intimidated by extra-legal forces? According to the Chief Judge of Plateau state, George Uloko, fear of removal and strict control through 'back stairs influences' are major factors that stifle judges' initiative and morale (*West Africa*, 1986).

Arthur Nwankwo's Case

In August 1982, a gubernatorial candidate for Anambra state, Arthur Nwankwo, published a book, *How Jim Nwobodo Rules Anambra State*. He was arraigned before a court on charges of seditious publication. It was alleged that his publication intended to bring hatred and contempt or excite disaffection against the governor of Anambra state. The trial judge agreed with the prosecutor and sentenced Nkwankwo to 12 months imprisonment. The judge also made this startling statement: 'The conviction and punishment of the accused, I hope, will help to stem the tempo of vulgar abuse and irresponsibility of both the politicians and media practitioners' (Nwankwo, 1983).

Nwankwo appealed that decision and on July 27, 1983, the federal court of appeal discharged and acquitted him. According to the appeal court, 'Sections 50 and 51 of the Criminal Code were anachronistic in the light of constitutional changes and the national sovereignty' (Ekwelie, 1986). In essence, the appeal court was concerned that an independent Nigeria still operated under laws that were passed by aliens to serve the purposes of a colonial administration. Furthermore, the court questioned the law's constitutionality.

Nwankwo's acquittal showed that the sedition law was inconsistent with constitutional guarantees. Earlier, on February 12, 1983, the Chief Justice of Anambra state had discharged and acquitted the *Weekly Trumpet* of sedition by the Anambra State Governor for publishing an article, 'Just Before the Storm.' In that case, the Chief Justice ruled that the sedition law was inconsistent with section 36 of the 1979 constitution which guaranteed freedom of expression (Ekwelie, 1986).

Analysis and Conclusion

The British colonial administration of Nigeria began in 1861. For about a hundred years, the British enacted several statutory provisions that regulated the press. But almost three decades after the attainment of political independence, the spirit and content of those colonial laws are still found in the pages of Nigeria's press laws.

This paper set out to determine whether there are any colonial legacies in the laws regulating contemporary Nigerian press. In order to answer the research question, the Public Officers (Protection Against False Accusation) Decree No. 4 of 1984 was examined. This law was chosen because its provisions constitute an embodiment of Nigeria's post-independence press laws. Its language is not radically different from that of the law of libel, sedition or the Newspaper Amendment Act – all post-independence laws. The paper tried to determine how the courts interpreted the post-independence press laws.

The study found that the roots of the post-independence press laws are clearly found in colonial statute books, strongly suggesting that the country's political leaders did not only inherit the colonial laws books but also incorporated their provisions in drafting Nigeria's contemporary laws.

Furthermore, the study found similarity between the events, circumstances and anxieties which helped to shape colonial and post-independence press laws in Nigeria. Government leaders in both colonial and post-independence periods were concerned about the effects unrestricted press criticisms could have on them and their administrations.

The study also found that shortly after independence, Nigerian courts were reluctant to uphold the rights of Nigerians to criticize their government. However, subsequent rulings including one during a military administration tended to portray the courts as defenders of citizens' rights. The courts also described

sections of the Criminal Code and sedition law as anachronistic and unconstitutional.

For further studies, it may be worthwhile to find out whether and to what extent the laws regulating the press in other African countries are reincarnations of the colonial statutes.

Notes

1. Letter from Prof. P.C. Agba, College of Journalism, University of Nigeria, Nsukka, to Chris W. Ogbondah, June, 1985.
2. For details of an editorial insinuating that General Murtala Muhammed was corrupt, see *African Spark*, October, 1975, p. 5.
3. For more details of the circumstances that helped to shape this law, see also: Fred Omu (1978). *Press and Politics in Nigeria, 1880-1937*. London: Longman; and T.N. Tamuno (1972). *The Evolution of the Nigerian State: The Southern State, 1898-1914*. New York: Humanities Press.

References

- Ekwelie, Silvanus A. (1986), 'The Nigerian Press Under Civilian Rule', *Journalism Quarterly*, Vol. 63, Spring, p. 98.
- Eastern Region of Nigeria Government, *Gazette*, June 30, 1955.
- Federal Republic of Nigeria Supplement to Official *Gazette* Extraordinary, April 4, 1984 p. A 53.
- Federal Republic of Nigeria Official *Gazette*, Sept. 5, 1964.
- Government Gazette*, Sept. 29 and Oct. 1 1909.
- National Concord* (Nigeria), February 6, 1984, p. 1.
- Nigeria Gazette*, January – June, 1916.
- Nwabueze, B. O. (1973). *Constitutionalism in the Emergent States*, London: C. Hurst.
- Nwankwo, Arthur A. (1983). *Justice: Sedition Charge Conviction, Imprisonment and Acquittal of Chief Arthur Nwankwo*, Enugu: Frontline Group Publishers.
- Ogbondah, Chris W. (1986). *Nigeria's Decree No. 4: A Sword Against the Pen*. Unpublished Ph.D Dissertation submitted to Southern Illinois University at Carbondale.
- Omu, Fred (1968). 'The Dilemma of Press Freedom in Colonial Africa: The West African Example,' *Journal of African History*, Vol. 9., p. 293.
- Okonkwo, C.O. and M. E. Naish (1964). *Criminal Law in Nigeria*. Lagos: African Universities Press.
- Onagoruwa, G. Olu (1976), *Press Freedom in Crisis: A Study of the Amakiri Case*. Ibadan: Sketch Publishing Co.
- Times International* (Nigeria), Sept. 23, 1985, p. 6.
- West Africa*, May 5, 1986, p. 969.
- West Africa*, July 13, 1987, p. 1365.