

## **The Media and the Law in Nigeria**

TonnieO. Iredia, PhD

Head, Department of Mass Communication, Nasarawa State University, Keffi

---

**Abstract:** *The immense contribution of the media to the success of the struggle for independence in Nigeria, the heroic role it also played in bringing to an end, military dictatorship in the country and its unending quest since the return to democracy in 1999 to make the country's government accountable to the Nigerian people are issues which underscore the pragmatic posture of the Nigerian media in its nation's development process. With this in mind, this paper examines the extent to which the media in Nigeria has been empowered over the years to function as the watch-dog and mirror of society. The paper finds that in addition to a hostile socio-political environment, the country's legal enactments tend to hinder rather than facilitate the growth and development of the Nigerian media. For instance, the highest law of the land-the constitution, specifically gives functions to the media without similarly making specific provisions to empower the same media to carry out the mandate. This is a far cry from what obtains in some other countries where the media is positioned to perform well making it obvious that there is the urgent need to update the relevant legal enactments in Nigeria. This, the paper suggests, should be done so as to make the Nigerian media more efficient and effective in public enlightenment.*

**Key terms:** *Media, watch-dog, law, Constitution, empowerment*

---

### **I. Introduction**

At independence in 1960, Nigeria already had a full complement of both the Print and the Electronic media-Newspaper since 1859, Radio from 1932 and Television since 1959. At first, radio being a colonial medium served essentially as a channel linking the colonial administrators with their home country. In due course, the service along with television took full control of presenting, the day-to-day activities of the Nigerian people. The Print media on its part has remained adversarial in line with the original objective of its founding fathers to use the media to fight the colonial masters so as to attain independence for the country- a posture which the gamut of physical challenges associated with the stages of societal development has sustained over the years. Indeed, to the media of a typical developing country, serving as an institutional opposition to government and all other authorities is the best way to compel them to develop society. In the case of Nigeria, it would also appear that the people accept such a watch-dog stand-point considering that they have always applauded the media for it and have continued to see media professionals as redeemers of the people. To a large extent, it is correct to say the media has kept faith with the people with its numerous fights to facilitate the nation's development. A review of such fights is helpful here.

### **II. The Media and the struggle for Independence in Nigeria**

No other group played a more crucial role than the media in the struggle for Nigeria's independence. As this writer argued elsewhere, "the great leaders of the nationalist movements in Africa and other political activists recognized the immense power of the media and relied on it to oust colonialism" (Iredia, 2015, p1). In Nigeria, the colonial press was spear-headed by leaders of nationalist movements like Herbert Macaulay, Nnamdi Azikiwe, Ernest Ikoli, Obafemi Awolowo, Anthony Enahoro and Ibrahim Imman who according to Jibo and Simbine (2003) used the press to fight gallantly to challenge the basis of colonial rule so as to liberate Nigerians from bondage. The attainment of independence was thus largely due to the media.

**Self-Governance in Nigeria: The posture of the media** Nigeria became an independent nation on October 1, 1960 thereby assuming a sovereign status that can account for itself. So did many other African countries. Surprisingly, the leaders of the nationalist movements who formed governments after colonialism did not show real interest in democracy. What they sought after was power and not democracy. Once in power, the leaders began to discourage opposition so as to perpetuate themselves in office leading to what Ake (1992, p2) described as "the criminalization of political dissent and the inexorable march to political monolithism." What this suggests is that if colonial rule brought little or no development to Africa, the situation was compounded by leaders of nationalists' movements who formed governments at independence. They did not fare better in the perception of the people because they merely stepped into the shoes of the white men leaving the people to remain mere objects of development. Expectedly, the indigenous governments of African nations came under severe media attacks on behalf of the people. In Nigeria, the media highlighted poor elections in the North and

the East in 1961 and in the West in 1965. The situation was the same with the elections into the federal House of Representatives in 1964 which was in fact preceded by a general workers strike in the year. By the time the political turmoil in the western region which led to the proclamation of a state of emergency in the region fully impacted on the nation, the Nigerian media was probably the first institution to celebrate the military intervention of 1966.

### **III. The Media in a militarized Nigeria**

Between 1966 and 1979 and again between 1983 and 1999, the Nigerian military seized political power and served as the nation's government. Although the interventions of the military during both periods were hailed by some people and a section of the media, there were too many issues that were bound to make the media hostile to the military. To start with, under a military government, the freedom of the individual and indeed that of the media would expectedly be in jeopardy. The Nigerian military lived up to that with so many Decrees, among them the following:

- i) Newspapers (Prohibition of Circulation) Decree No. 17, 1967. This decree empowered the Head of the federal military government to prohibit the circulation of any newspaper which he considered detrimental to any part of the country
- ii) Public Officers (Protection against False Accusation) Decree No.11, 1976. This decree made it an offence for any person to publish any false allegation of corruption in relation to any public officer. When the military returned to government in December 1983, it reproduced the Decree as No.4 of 1984.
- iii) Newspaper (Prohibition of Circulation) (Validation) Decree No.12, 1978. This decree formalized the ban on the circulation of some issues of the New Breed Magazine. A similarly worded Decree, No.48 of 1993, likewise banned some newspapers including Concord and Punch from being published and circulated in any part of Nigeria.
- iv) State Security (Detention of Persons) Decree No.2, 1984. This decree empowered the Chief of Staff, Supreme Headquarters to order the detention of any person he considered necessary to exercise control over. The decree was later amended to bar the courts from asking that anybody so detained be produced.

As for the liberty of the individual, the military put alleged corrupt politicians on trial and contrary to what happens in civilized societies, every accused person was deemed guilty until proven otherwise. In addition, some of the decrees were retroactive making a subject an offence when it was not so at the time it was allegedly committed. The media severely criticized the military on this apparent bad law just as the people's transparent lack of faith in its political programmes provoked adverse reactions from the media. General Yakubu Gowon, who had promised to hand over to a civilian government in 1975, reneged on his promise. Following incessant changes in his transition programme, the media captioned General Babangida's programme as "transition without end". General Sani Abacha launched 5 political parties during his own transition programme and manipulated the system to make himself the candidate of all the parties, thus seeking to organize a self-succession programme (Sango, 2006). The media also opposed the dictatorial military governments because they proved to be no less corrupt than the civilian governments they toppled (ITN News, 1992).

### **IV. The Nigerian media and Presidential Democracy**

From 1979 to 1983, Nigeria operated a democracy anchored on the Presidential system of government with Alhaji Shehu Shagari as President. Since 1999, the nation has recorded four democratically elected Presidents - Olusegun Obasanjo, Umaru Yar'Adua, Goodluck Jonathan and Muhammadu Buhari. The governments of these Presidents were thus neither alien like a colonial government nor a dictatorship like a military government to which the media should constitute an opposition. Yet the media fiercely opposed each of them. Media opposition to the current President is however probably too early to analyse. A few examples of the posture of the media to the others will suffice here

#### **(a) Manipulation of the political process.**

Throughout the Second republic, the government of President Shehu Shagari which was under intense media criticism was described as the "Stolen Presidency". What happened was that at the end of the 1979 election, the best of the candidates secured 25 percent of the total votes cast in 12 instead of 13 states which by public perception fell short of the requirements for the declaration of a winner. The Judiciary however resolved the issue in favour of Shagari bringing to the fore, a controversy titled "12<sup>2/3</sup>" which the media was encouraged to deprecate by a dissenting judgment in the Supreme Court (Eso, 1979). All through his tenure therefore, the

media – particularly the southern-based portrayed President Shagari as an impostor. The Obasanjo Presidency, 1999-2007 was similarly loathed for alleged manipulation of the political process. Indeed, the tail-end of the tenure of President Obasanjo was replete with bad press. The major issue was the amendment of the constitution on 'tenure' which the media and the public generally believed was manipulated by the President to secure a third term after 2007. The adverse publicity of the media on the subject was so overwhelming that the National Assembly itself threw out the proposed bill without following the rigours of readings and resolutions. Uproar over Obasanjo's third term campaign (Toye, 2005)

**(b) Corruption**

The public and the media believed that the economic misfortune of the nation was instituted by the Shagari administration through bogus contracts and misappropriation of funds. As if to confirm this, the Buhari military government which terminated the Second Republic clamped several political leaders to ridiculously long years of imprisonment. Through features, articles and editorials, the Nigerian media hailed the development. Media reactions to corruption charges during the administration of President Obasanjo took the same form. At first, the media hailed the administration for setting up the Independent Corrupt Practices Commission (ICPC) and the Economic and Financial Crimes Commission (EFCC) to fight corruption and continued to project the two bodies as the tempo of the crusade rose steadily with top government officials removed from office and brought to trial on account of corruption charges. The proactive attitude of the media to cases of corruption was well applauded as the tonic for the fight against corruption (Akanbi, 2004). In due course, the direction of the media changed as it began to insinuate that the war was no longer being fought with vigour or in good faith. Issues of selective prosecution of offenders and the use of corruption charges as a weapon against perceived enemies were being highlighted daily in the media. The several calls for the trial of President Obasanjo himself soon after he left office would suggest that the media remained dissatisfied with the methods and approaches used to fight corruption during his tenure.

**(c) Poor Governance**

Media campaigns in the post-Obasanjo years showed that the media also nursed grudges against Presidents Yar'Adua and Jonathan. The media adversely criticised the manipulation of the primaries of the Peoples Democratic Party (PDD) from which Yar'Adua emerged. On assumption of office, President Yar'Adua promised a drastic change to the nation's epileptic power supply. His inability to meet this promise pushed the media against him describing his 7-point Agenda as a slogan and not a development programme. The failing health of the President and its resultant controversy over an acting President probably helped the media to establish a charge of weak leadership against President Yar'Adua. President Goodluck Jonathan on his part appeared to have secured a pan-Nigerian mandate to assume office after the death of Yar'Adua, but the media did not relent in attacking his administration. The bone of contention was the high level of insecurity in the nation. Apart from the wanton loss of lives and property arising from the post-election violence mostly in the northern part of the country, incessant bombings in different parts of the country and the abduction by insurgents of school girls in Chibok, North-East of the nation popularized media attacks on President Jonathan.

There was also loud public condemnation of a high degree of corruption in the management of public affairs which many attributed to the absence of good governance in the country during Jonathan's administration. Allegations of missing huge sums of money from government coffers were not satisfactorily explained and the ruling party did not appear perturbed by the general feeling during the Jonathan's administration. As Tenuche (2014, p265) testified, the party's governance style was authoritarian; lacked respect for the rule of law, highly corrupt and unable to deliver the dividends of democracy.' Thus, people were justifiably dissatisfied over many issues among them, lack of good public transportation; ineffectual health care system; falling standards in education; rising unemployment; non-adherence to the rule of law and a plethora of undemocratic practices. The media as the mirror of society did not fail to reflect the mood of the nation.

The point that has been so roundly made is that the Nigerian media has been aggressive in its posture towards every Nigerian government. It fought the colonialists and helped the leaders of nationalist movements to attain independence for its nation. Thereafter, it fought the indigenous government which emerged after colonial rule because of the slow pace of the country's development. Soon after, it began to fight the military for trampling on the freedom of the people. It also fought and has continued to fight leaders of democratic governments for their insincerity, level of corruption and weak leadership. In return, Nigerian media professionals have been exposed to all forms of dangers. According to Gadzama (2014, p1), "in the last 100 years, Journalists, playwrights, poets, novelists and editors have all felt the wrath of the government on the numerous occasions that they have demanded good governance. They have been imprisoned; their newspapers banned and have faced kangaroo trials. This is without mentioning the uncountable occasions that members of the Armed Forces have "accidentally" killed or "accidentally" brutalized media practitioners." On World Press Freedom Day in 2012, the immediate past President of the Nigerian Guild of Editors, Femi

Adesina openly regretted that successive administrations in Nigeria had always treated the media with suspicion, if not as some sort of adversary (Akingbolu, 2012). Is the trend attributable to the system of media laws in the country?

### V. Legal empowerment of the Nigerian media

The crucial role of the media can be said to be properly recognized in Nigeria because the nation's highest law—the Presidential Constitution of the Federal Republic of Nigeria (1999) assigned to the media, some specific functions in its Chapter 2 titled 'fundamental objectives and directive principles of state policy.' The chapter is no doubt fundamental because it spells out in details what can radically develop the nation and uplift the living conditions of the people. Unfortunately, as if using the left hand to retrieve what has been given by the right hand, the constitution classifies the chapter as non-justiciable; meaning that the constitution bars the people from legally compelling the government to live up to the high expectations envisaged by the chapter.

It is in fact instructive that another noteworthy provision in the same constitution, this time, Section 308 makes it impossible for anyone to sue the President or State Governors whose mandate is to implement public policy. The section makes the following crucial points: a) no civil or criminal proceedings shall be instituted or continued against a person to whom the section applies during his period of office; b) a person to whom the section applies shall not be arrested or imprisoned during that period either in pursuance of the process of any court or otherwise; and (c) no process of any court requiring or compelling the appearance of a person to whom the section applies, shall be applied for or issued. From these provisions, it can be argued that the Nigerian constitution merely professes to be interested in making government accountable to the people. If the government cannot be successfully sued for not providing the benefits contained in chapter 2 of the constitution, of what use then is the chapter? In other words, who is liable for failure to develop society if those mandated to do so are shielded from prosecution?

It can be argued therefore that proposing the lofty ideals in chapter 2 and yet legally stopping the people from demanding that the ideals be implemented creates an obvious lacuna. Perhaps that influenced the writers of the constitution to insert the provisions of section 22 in the chapter. According to the section, "the press, radio, television and other agencies of the mass media shall at all times be free to uphold the fundamental objectives contained in the chapter and uphold the responsibility and accountability of the Government to the people." This fundamental decision to make the media the 'police' of the all-important chapter 2 is thus reassuring. But then, does the constitution correspondingly empower the media to carry out this onerous assignment? The answer can only be in the negative because all that the section did was to merely assign a function to the media. To allocate a function is an entirely different thing from providing the where-with-all for the successful implementation of the function; just as there is a clear difference between 'responsibility' and 'authority'. This paper accordingly contends that the Nigerian media is not legally empowered to perform its duty.

There is however the argument that the media can rely on the freedom of speech provision in section 39(1) of the constitution which provides that "every person shall be entitled to freedom of expression, including freedom to hold opinions and to receive and impart ideas and information without interference." A proper scrutiny of this provision however shows that it is not about Press freedom but freedom of speech. To argue that because media professionals are citizens, they are covered by the general provision on freedom of speech which is available to all is simplistic. In any case, there is evidence that the constitution itself does not see the media and the public as one; hence it assigned functions to the general public before isolating the media for its own mandate. Section 13 of the constitution provides that *everyone* including all organs of government and all authorities and persons, exercising legislative, executive or judicial powers, shall conform to, observe and apply the provisions of Chapter 2 of the Constitution. To further reiterate down the line at section 22 that the media is a body upon whom the observance of the provisions of the chapter rests shows that the constitution intended to differentiate the media from the general public. Having thus effected such a differentiation, the media should not be expected to derive its empowerment from that of the public. Instead, there ought to be an exclusive provision on Press freedom to enable the media to meet the specific mandate given to it by section 22.

It is equally a weak point to assume that the media is fully empowered to function because section 39 (2) of the constitution provides that "every person shall be entitled to own, establish and operate any medium for the dissemination of information, ideas and opinions." A proper scrutiny of the provision reveals that it merely protects the interests of owners and not those of media professionals who are the real operatives to police the fundamental objectives and directive principles of state policy enshrined in chapter 2 of the constitution. What this suggests is that the media is yet to be empowered to meet its constitutional mandate. Aturu (2010) made the same point when he warned that care must be taken not to mistake the empowerment of media owners for that of the media. In making a demand for specific freedom in the constitution, is the media not seeking to be pampered? Those who may think so, may have a change of heart with a look at how some other countries have handled the subject.

In the United States of America, the first amendment to the Constitution specifically provides that Congress shall make no law restricting the Press. Although the courts have long struggled in that country to determine whether the Framers of the Constitution intended to differentiate press freedom from speech freedom, some legal scholars, including Justice Potter Stewart, of the U.S. Supreme Court, have persuasively advocated special press protections distinct from those accorded to speech. In Ghana, Section 162 (4) of the nation's constitution expressly empowers the media to function. In the words of the section, "editors and publishers of newspapers and other institutions of the media shall not be subject to control or interference by government nor shall they be penalized or harassed for their editorial opinions and views or contents of their publication." In Malawi, Section 36 of the constitution provides that the media "shall have right to report and publish freely, within Malawi and abroad and to be accorded the fullest possible facilities for access to public information." The situation in Malawi is probably the most apt as the country provided for freedom of expression in section 35 of its constitution and moved just one step ahead to provide for Press freedom in section 36. Therefore, Malawi and other countries which have specific provisions for media freedom in their constitutions notwithstanding that there is a general provision for freedom of speech have established beyond reasonable doubt that Press freedom and freedom of speech are not coterminous.

If therefore the media in the USA, Ghana, Malawi and some other countries are more courageous in their facilitation of social change in their countries, the statutory support they have; cannot be wished away. In Nigeria on the other hand, there is ample evidence that the media is not free. It is in earnest obvious from the Acts, Laws and Regulations which govern media practice in the country that there has always been an overzealous official policy to legally gag the media. The trend in fact dates back to the colonial era when the Newspaper Ordinance of 1903, the Sedition Ordinance of 1909 and the Criminal Code of 1916 came into being. One of the early steps of the colonial governor, Frederick Lugard after the amalgamation of the Northern and Southern Protectorates of Nigeria was to consolidate all existing Acts to enact the Newspapers Act of 1917 for the sole purpose of regulating the existence of Newspapers through the process of registration. The Act was amended in 1964 to accommodate Government owned Newspapers which did not exist before then and in 1993, it was amended again to increase penalties for breaching any provisions of the Act.

Other laws which govern media practice in Nigeria such as those on Sedition, Pornography, Official Secrets, Copyright and Defamation were similarly enacted essentially "to repress the press and prevent criticism of the government in power" (Aturu 2010, p133). In the case of the law of defamation, some media professionals think that the law can make the nation's media timid because, it provides for a greater penalty for the media used, than the person who actually committed the offence (Iredia, 2012). Indeed, as far back as 1961, the Supreme Court of Nigeria had held that the mass media have no special immunity; they must bear full responsibility for their actions (Momoh, 2004). The media is also virtually liable for only the more serious dimension of defamation-Libel and not slander because every defamatory act in the media being in permanent form requires no special proof and as the lawyers say 'is actionable per se'.

'Judge made' Law is another intrinsically punitive law. In Nigeria, Journalists are occasionally confronted with such issues as Contempt of Court. In 2012, for instance, a magistrate court judge ordered the police to arrest and detain seven judiciary correspondents in Lagos, south west Nigeria. The judge accused the journalists of allegedly disturbing court sessions with their cameras and phones, as they were said to be busy clicking for exclusive pictures, which eventually angered the judge, who handed down the order. Based on the directive, which was interpreted as contempt of court, the journalists were moved from the court premises at Ikeja GRA to Area F police command for eventual detention (Udom, 2012).

In addition to the laws, there are also several regulatory bodies such as the Nigerian Press Council, the National Broadcasting Commission, the Film and Video Censors Board and the Copyright Commission set up essentially to put the media in check all the time. In the case of the Nigerian Press Council (NPC) which regulates the print media, it is set up supposedly to protect both the public and the press, but it is difficult to find an example of the NPC ever standing on the side of media operatives despite the numerous attacks on them in Nigeria. Interestingly, no media professional expects the council's protection in view of the judicial decision that its enabling law is "oppressive, overbearing and grossly not compatible with the standard of a society" (Iriekpen, 2010). On its part, the National Broadcasting Commission (NBC) which regulates broadcasting in the country penalizes only the opposition media and for frivolous reasons too. In 2009, it took the courts to save AdabaFM 88.5 Radio, an Akure based station from the claws of the regulatory body. According to Sowole (2009), the decision of the NBC to shut the station was reversed by Justice C. Okeke of the Federal High Court Akure who upheld the plea of the station that the NBC breached its constitutional right to fair hearing, freedom against discrimination and freedom of expression.

As for the public media, their enabling laws are equally restrictive leaving the operatives with little or no room for personal initiative and discretion. For example, the Nigerian Television Authority Act which sets up the main public television broadcaster says in its section 12 that, "the Minister may give the Authority direction of a general character or relating generally to political matters with regard to the exercise by the

authority of its functions under this act and it shall be the duty of the Authority to comply with such directions.” The same provision which is reproduced in the laws setting up the Federal Radio Corporation of Nigeria and the Voice of Nigeria has turned out to be the basis for which the organizations are now and again professionally misdirected especially to manipulate their news bulletins (Iwokwagh, 2005).

Perhaps some of the media laws and regulations so far identified fall into the category which section 45 of Nigeria’s Constitution says may be reasonably justifiable in a democratic society in the interest of defence, public safety, public order, public morality or public health; or for the purpose of protecting the rights and freedom of other persons but their implementation as shown above are often inimical to media practice in Nigeria. It is therefore necessary to call for moderation in the urge to control the media in the country. This is because although some media reports occasionally inflict pain on some people and their families, the public is the main beneficiary of the media exposure of events and ills of society. It should be constantly borne in mind that as the watch-dog of society, it is the media which points out danger signals in the horizon to forestall a woeful end. In addition, it is inappropriate to gloss over the commendable role of many media professionals in several matters of public interest to impute that they are always used for only ignoble purposes.

Like every other profession, the media certainly has its bad eggs that are engaged in sensationalism, inaccurate reporting, corrupt practices and other vices. It also has a plethora of constraints; among them, ownership control, poor salaries as well as inadequate human and material resources. These notwithstanding, the media can be exceedingly useful to society because it is the most effective organ of public enlightenment which can empower the people to be rational, wise and useful to themselves and society. It is indeed instructive that at the 11<sup>th</sup> Annual All Nigerian Editors conference (ANEC) in Yenagoa, Bayelsa State in August 2015, the Guild admonished its members in a communiqué to among other things, “do more to bring about the change Nigerians are yearning for by playing the watchdog role assigned them by Section 22 of the Nigerian Constitution.” For this to happen, media practice in the country certainly desires a far more favourable environment than presently holds. Fortunately, Nigeria has since 2011 joined those countries which operate a freedom of information regime which can assist the media to further educate the public. It is however unfortunate that the Freedom of Information Act (2011) which provides for unhindered access to public information has not substantially changed the situation because the modalities for implementing the law are yet to be institutionalized.

## **VI. Conclusion**

The main issue highlighted in this paper concerns the pragmatic roles played by the Nigerian media at different stages of the nation’s development. The paper established that although such roles helped the country to overcome colonialism, dictatorship and anti-democratic activities, the Nigerian media needs to be better appreciated by the nation and its people. Apart from a hostile environment characterized by poor remuneration of media operatives and their frequent harassments by law enforcement agencies, there are no legal enactments that are pro media in the nation. Most importantly, press freedom is not guaranteed by the nation’s constitution as some other countries have done, yet the Nigerian constitution assigns functions to the media as an institution. Other legal enactments including the enabling laws setting up media organizations and the several media regulatory bodies tend to unduly and adversely breathe down heavily on the media.

Accordingly, the paper calls for a change of heart towards the Nigerian media because except there is some good measure of balance between the expectation that the media would undertake developmental journalism and the constraints it goes through in the performance of its functions, public enlightenment would suffer. On their part, Nigerian media professionals must strive to play their agenda setting role more effectively by ensuring that they raise the level and quality of public debates on issues of national interest. With that, perhaps those who are not convinced that the Nigerian media deserves more freedom and respect may have a rethink. We cannot rule out the possibility that such a trend might influence a pro-media disposition in the nation especially the making of media friendly laws and regulations which would be beneficial to all.

## **References**

- [1]. Agbaje, A. (1992). *The Nigerian press, hegemony, and the social construction of legitimacy: 1960-1983*. Lewiston, NY: The Edwin Mellon.
- [2]. Akanbi, M. (2004). *The fight against corruption*: Extract from ‘Point Blank’, NTA’s Interview Programme. Abuja: September 15.
- [3]. Akingbolu, R (2013). *World Press Freedom Day: How Free is the Nigerian Press?* ThisDay Newspaper, May 19
- [4]. Eso, K (1979) 2/3 of 19 is not 13 states: Dissenting judgment in the Presidential election petition *Awolowo v. Shagari NSCC* 87
- [5]. Aturu, B. (2010). *Freedom of the press in Nigeria: Some fundamental issues*; presented as lead paper at the fourth Lawyers in the media forum in Kaduna
- [6]. Gadzama, J. (2014). *Nigeria: Media, Law and Good Governance* presented at the NBA’s Lawyers in the Media forum. Lagos Daily Independent, December, 18.
- [7]. Iredia, T. (2007). *Broadcasting in a developing country: Challenges to Professionalism* in G. Gbadamosi (ed) *Advancing the frontier of media law*. Lawbreed Limited
- [8]. Iredia, T. (2015). *Gaps in Nigerian Media History: A paper submitted for publication to the International Journal of Communication*, University of Nigeria, Nsukka. August

- [9]. Iriekpen, D. (2007). Nigeria: Court Declares Press Council Law Oppressive. [www.thisdayonline.com/nview.php](http://www.thisdayonline.com/nview.php) (retrieved September 28, 2015)
- [10]. ITN, News. (1992). IBB accused of insincerity & corruption after he postpones civil elections. London 1<sup>st</sup> December
- [11]. Iwokwagh, N. (2005). The politics of Nigeria's fourth republic and government owned broadcast media: The issue of news manipulation. Makurdi: Aboki Publishers
- [12]. Jibo, M. & Simbine, A. (2003). Contemporary Issues in Nigeria. Ibadan: JODAD Publishers.
- [13]. Momoh, T. (2004). Nigerian media law and ethics. Pugmark Nig. Ltd. (Educational Publishers).
- [14]. Sango, S. (2006). A paper at the symposium on the third term agenda organized by the Centre for Legislative Studies in Ogba, Lagos. The Punch, April 7
- [15]. Sowole, J. (2009). Nigeria: Court Orders NBC to Reopen Radio Station This Day Newspaper, May 13.
- [16]. Stewart, P. (1972). Branzburg v. Hayes, 408 U.S. 665, 92 S. Ct. 2646, 33 L. Ed. 2d 626
- [17]. Tenuche, M (2014). Ruling Party and Governance in Nigeria, 1999-2013 in O. Obafemi et al (Eds). Political parties & democracy in Nigeria. A publication of the National Institute for Policy and Strategic Studies (NIPSS), Kuru
- [18]. Toyé, O. (2005). Uproar over Obasanjo's third term campaign [http://www.newsfromafrica.org/newsfromafrica/articles/art\\_10550.html](http://www.newsfromafrica.org/newsfromafrica/articles/art_10550.html) retrieved October 01, 2015.
- [19]. Udom, E. (2012). Why Judge ordered police to arrest 7 journalists. The Nation Newspapers Lagos. April 04