

## Social and Legal Examinations of the Act of Contempt of Court and Parliament by the Nigeria Media

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### Abstract

Courts have broad powers to punish persons who offend the Court, interfere with legal proceedings, or disobey Court orders. Contempt is used both to protect the rights of litigants in Courts and to punish a wrong committed against the parliament or the Court itself. In this paper, efforts were made to examine the framework for the varieties or forms of contempt of court and parliament and its proceedings in Nigeria. The paper adopted a doctrinal method by utilizing both primary and secondary sources. The findings were that the Courts today rarely justify the exercise of the contempt power on the grounds that it protects the integrity of the judge and institution. Instead, protection of the authority, order and decorum of the court is the usual reason given for the use of the contempt power. In addition, the Court uses contempt proceeding to protect the rights of the litigants using the Court to settle a dispute. It was concluded in this paper that even though the offence of contempt of court is for the preservation of the power and dignity of the court, it must not be used to harass and intimidate counsels or litigants. Therefore, where there is need for the court to use its power of committal for contempt against itself or the parliament, it must be for the restoration of sanctity.

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### **Background to the Study**

The law of contempt of court and parliament refers to any conduct that tends to bring the authority and administration of the law and the parliament or legislature into disrepute or to prejudice party's litigant or their witnesses during litigation or parliamentary session/sitting. It is an essential adjunct of the rule of law (Ikoni:2024). Contempt of court and parliament is the established name given to the species of wrongful conduct which consists of interference with the due administration of justice or disobedience to orders of court and rights and privileges given to parliament in a democratic setting. It is an essential adjunct of the rule of law (Ikoni:2024). Parliamentary reporters must be well acquainted with parliamentary proceedings. Also, they must know the names and functions of the various officers of the parliament e.g. House Majority Leader, House Minority Leader, Chief Whip, Speaker, Mace Bearer, etc. Like court stories, all statements made by Members of Parliament (MP) must be accurately quoted or explained. The reporter must always remember that resolutions, rules and amendments are adopted while bills are passed and laws are enacted.

### **Conceptual Framework**

For a proper understanding of the topic of this conference paper, it will be worthwhile to proffer definition of some key words in the topic, and in this case court, contempt of court and contempt of Parliament. It is therefore important to grasp its meaning in order to unraveling what it entails despite the prospect and challenges that might be encountered.

### **The Concept of Court**

A Court is a governmental body consisting of one or more judges who sit to adjudicate disputes and administer justice (Black's Law Dictionary: 2015). In other words, a Court is a permanently organized body, with independent judicial powers defined by Law, meeting at a time and place fixed by law for the judicial public administration of justice (William: 1931). An order on the other hand is a written direction or command delivered by a court or judge. The word generally embraces final decrees as well as interlocutory directions or commands (Black's Law Dictionary: 2015).

Note that, while an order may under some circumstances amount to a judgment, they must be distinguished, owing to the different consequences flowing from them, not only in the matter of enforcement and appeal but in other aspects, as, for instance, the time within which proceedings to annul them must be taken. Rulings on motions are ordinarily orders rather than judgments. The class of judgments and of decrees formerly called interlocutory is included in the definition given in contemporary usage of the word 'order' (Freeman: 1925). Courts in Nigeria may be classified in several ways. For example, they may be classified into Federal courts and state courts or, superior courts and inferior courts or courts of record and court other than courts of record.

### **The Concept of Contempt of Court**

The concept of contempt of court like all other concept defies a general acceptable or unified definition. Contempt of court can be defined as: any act which is calculated to

embarrass, hinder or obstruct court administration of justice, or which is calculated to lessen its authority or its dignity, committed by a person who does an act in wilful contravention of its authority or dignity, or tending to impede or frustrate the administration of justice or by one who, being under the court's authority as a party to a proceeding wilfully disobeys its lawful orders or fails to comply with an understanding which he has given (NOUN:2019).

Contempt is a noun and means the act or state of despising; the condition of being despised. It also means a conduct that defies the authority or dignity of a court or legislature. In ordinary language, contempt means any feeling that somebody or something is without value and deserves no respect at all (Oxford dictionary: 2018). The summary power of the courts in Nigeria to punish contempt of their authority had its origin in the law and practice of England where disobedience of court orders was regarded as contempt of the King himself and attachment was a prerogative process derived from presumed contempt of the sovereign (Fox 1908). As law-abiding and responsible citizens, journalists are expected to respect the courts in the course of their official duties. However, in the past there have been altercations between journalists on the one hand and judges and magistrates on the other over contempt.

### **The Concept of Contempt of Parliament**

Just as the court could punish anyone for obstructing its proceedings or trying to bring administration of justice into disrepute, the parliament has the power to punish any person for an act or omission that tend to obstruct either Houses of the Parliaments (Senate or House of Representatives) and the State Houses of Assembly in the discharge of their duties. The parliament also has the power to punish for contempt any insult or attack on the person of any member of parliament (MP) for words spoken or opinion raised on any matter debated in the House or in the precincts of the House.

Simply put, contempt of parliament is any act or words that tend to obstruct or impedes either Houses of Parliament in the performance of its functions or any acts or words which tend to intimidate or influence members of either House in the discharge of their duties. Members of Parliament (MP) enjoy immunity against what they say during parliamentary proceedings, the disclosure by the press of such statements may lead to contempt of parliament. The law also forbids journalists and any of the media generally to engage in obscenity. Obscenity refers to words, thoughts, magazine and pictures that are against good morals. Mr. Justice Sachs as cited by Daramola (1999) once defines obscenity to mean "filthy, indecent, offensive to modesty or decency, expressing or suggesting lewd thoughts". Obscene publications are simply those publications that are likely to deprave and corrupt those who are likely to read, see or hear it, or corrupt public morals or outrages public decency.

### **Empirical Review**

Although, the power of the court to punish for contempt of court and Parliament had its initial authority from the "inherent powers" of a superior court of record, there are other

statutes that conferred power on the courts to punish for contempt in Nigeria. The literature review on the framework for the offence of contempt of court and parliament in Nigeria shall therefore be discussed with reference to the Constitution of the Federal Republic of Nigeria, 1999, the Criminal Code Act and the Penal Code Law.

### **The Constitution of the Federal Republic of Nigeria, 1999**

The term 'judicature' means the system of administration of justice (Deluxe encyclopedia: 2018). According to the Black's Law Dictionary, judicature is the action of judging or of administering justice through duly constituted courts (Black's law dictionary: 2019, pg. 922). Judicial power is therefore 'the authority vested in courts and judges to hear and decide cases and to make binding judgment on them; the power to construe and apply the law when controversies arise over what has been done or not done under it.' The term 'judicial power' also refers to the types, levels and hierarchy of courts whose responsibility it is to interpret and apply the law, including the Constitution, statutes and regulations, jurisprudence and leading precedents. The judiciary also provides processes to resolve disputes. It administers the law impartially between individuals, and between persons and public authorities. Within the proper limits of their judicial function, judges also guarantee the observance, protection, and attainment of human rights. Judges ensure that all people are securely governed by the Rule of Law and equal justice under law.

Under the Constitution of the Federal Republic of Nigeria, 1999 (as amended), the judicial powers are vested in both Federal and State courts.<sup>1</sup> Accordingly, by section 6(1) of the Constitution, "the judicial powers of the Federation shall be vested in the Courts to which this section relates, being courts established for the Federation." In the same vein, by section 6(2) of the Constitution, "the judicial powers of a state shall be vested in the Courts to which this section relates, being courts established subject as provided by this constitution, for the state."

*By section 6(3) of the Constitution, the courts to which this section relates, established by the Constitution for the Federation and for the States, specified in subsection (5) (a) to (f) of this section shall be the only superior courts of record in Nigeria; and save as otherwise prescribed by the National Assembly or by the House of Assembly of a State, each court shall have all the powers of a superior court of record. Although the Constitution empowers the National Assembly or any House of Assembly of a State to establish courts other than those to which this section relates (Section 6 of the 1999 Constitution).*

The Constitution of the Federal Republic of Nigeria, 1999 (as amended) also made provisions for *inherent powers* of the court to do justice in the exercise of the judicial powers granted the Court. This is provided for in section 6(6) (a) and (b) of the constitution which provides that:

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<sup>1</sup>See section 6 of the CFRN, 1999, as amended

*The judicial powers vested in accordance with the foregoing provisions of this section: (a) shall extend, notwithstanding anything to the contrary in this constitution, to all inherent powers and sanctions of a court of law; (b) shall extend to all matters between persons, or between government or authority and to any person in Nigeria, and to all actions and proceedings relating thereto, for the determination of any question as to the civil rights and obligations of that person.*

It is clear from the provisions of section 6 of the Constitution of the Federal Republic of Nigeria, 1999 (as amended), that the judicial powers for the purpose of administering justice are vested in the courts. The courts of law that are duly established, have over several centuries been given the task, though arduous, to administer justice between persons or between person and government or arms of government or institutions with less rancour and much satisfaction.

#### **Penal Code Law**

The Penal Code Law (1960), also make provision for the offence of contempt of court. To this end, section 155 of the Penal Code provides that:

*Whoever intentionally offers any insult or causes any interruption to any public servant while such a servant is sitting at any stage of a judicial proceedings shall be punished with imprisonment for a term which may extend to six months or with a fine which may extend to 20 pounds or both.*

It could therefore be seen that the power of the court to punish for contempt is not only a matter of inference from the inherent powers of the court to do justice but is constitutionally recognized in Nigeria and derived from the provisions of both Criminal Code Act and Penal Code Law. In other words, if the courts are to do justice, they need power to administer it without interference or affront, as well as to enforce their own orders and to punish those who insult or obstruct them directly or indirectly in the performance of their duty or misbehave in such a manner as to weaken or lower the dignity and authority of law.

#### **Public Analysis on Contempt of Court and Parliament**

The power of a judge to punish for contempt of court is a remnant of the power of English royalty. Today, courts have broad powers to punish persons who offend the court, interfere with legal proceedings, or disobey court orders. Contempt is used both to protect the rights of litigants in the courts and to punish a wrong committed against the court itself. From the analysis and some of the decisions of court in this presentation, some limits have been placed on the contempt power to the point that before criticism of a court may be punished by contempt, it must be shown that the criticism created a clear and present lawyer of the likelihood of interference with the administration of justice, not the ego or personality of the presiding judge.



In the eyes of the public the offence of contempt of court and Parliament is a serious one and it is necessary not only for the protection of the courts of justice and House of Parliament but also for the preservation of and the administration of justice. There is therefore need for reform of the law of contempt of court. However, since criminal contempt is a creature of statute, the maximum sentence for contempt committed for instance under S.133 of the criminal code is three months imprisonment. In civil contempt, it does not seem clear what limit has been placed on the court's power of punishment whether the punishment be a fine or imprisonment or both it is not clearly stated. It is worthy of note that in most cases of civil contempt, the court usually adopt the same method of punishment for criminal contempt.

Acts that constitute contempt of courts are:

- i. **Physical Violence on the Judge:** Assaulting a judge is a grave impediment in the administration of justice that can occur anywhere in the world. It amounts to attacking the very citadel on which justice stands. Thus, assaulting a judge, or attempting to assault a judge will be treated as a most serious contempt of court. Personal outrages against a judge, however, have not been very common, and in the main have been restricted to person (usually the accused having just been found guilty) throwing missiles at the judge.
- ii. **Interruptions of Court Proceedings:** Acts exhibited or words spoken to interrupt court proceedings constitute an interference or hindrance of due administration of justice and thereby amount to contempt.
- iii. **Taking of Photographs in the Court:** Taking of photograph can in general be contempt just as much as any accompanying story. The rule is that publication of the photograph of a defendant is not likely to be contempt provided there is no argument about his identity. But if the case hinges on witnesses identifying the defendant in court or at an identity parade, as a man who committed the crime to use a picture of the man would clearly be contempt. Thus, it has been held that "it is contempt of court to publish a photograph of the person charged with a criminal offence where it is reasonably clear that the question of the identity of the accused person with the criminal has arisen, or may arise, and such publication is calculated to prejudice a fair trial.
- iv. **Disrespect for the Court:** It is not clear whether the mere showing of disrespect for the court will amount to contempt of court or is simply an instance of discourtesy. However, the courts have been apt in admonishing disrespectful behaviours. For example, it will be disrespectful, but not necessarily contempt for a party or counsel to fail to bow before the court or to stand up when the court is rising. In the same vein, it may not be disrespectful to the court to read newspaper inside the courtroom but could be discourtesy to the presiding judge.
- v. **Disobedience of Orders of Court:** Disobedience of injunctive orders, particularly in labour disputes, has been a fruitful source of cases dealing with contempt of court.

One of the difficult human endeavours to report is politics and parliamentary proceedings. To be working as a beat reporter for parliamentary proceedings therefore, requires more carefulness and dedication. It is just like walking on a tightrope. One wrong step, you are in for a charge of libel.

### **Contempt of Parliament**

What makes the parliament or legislature difficult to report is that members of both bodies are constitutionally immuned of being charged to court for libel for any libelous statements made on the floor of the House whereas any member of the media who reports such Libelous statements, stands the risk of being jailed if he is found guilty on a charge of libel. Where the problem really lies is that in many parliamentary proceedings, members make defamatory statements. Since they know that they are constitutionally immuned, they feel free to say anything they like. While the parliamentarians are free to say anything, they like and can get away with it, the reporters are not so free. What that boils down to is that a reporter who is assigned to report parliamentary proceedings must weigh the members' utterances very well with a view to sifting the chaff from the grain. All libelous statements made by members on the floor of the House must be eliminated in the story.

Alternatively, the reporter may correctly quote the person who made the statement concerned since it is already on tape. In other words, although one may not be a television or radio reporter, yet one is expected to be equipped with a tape recorder when covering parliamentary proceedings for your newspaper. This is essential in developing countries such as Nigeria and other African countries where a statement made by a government functionary a moment ago can be denied an hour later.

This is good advice not only for beat reporters for parliament or legislature but also for beat reporters for courts and political campaigns. On the everyday routine of parliament proceedings, the beat reporter concerned should endeavour to get to the parliament arena on time. He should listen well to the statements made or being made by each MP. He needs to note down any obscure point in his reporter's notebook. At the end of the day's proceedings, he should contact the House Speaker or House Majority Leader or the sponsor of the bill concerned for further clarification. Chairmen of relevant standing Committees may also be contacted for help. In addition, he could get a copy of the House's Record Books and check for the necessary facts in it.

Parliamentary reporters must be well acquainted with parliamentary proceedings. Also, they must know the names and functions of the various officers of the parliament e.g. House Majority Leader, House Minority Leader, Chief Whip, Speaker, Mace Bearer, etc. Like court stories, all statements made by Members of Parliament (MP) must be accurately quoted or explained. The reporter must always remember that resolutions, rules and amendments are adopted while bills are passed and laws are enacted.

Examples of acts that constitute contempt of parliament are legion. Some of them include the followings:

- a) Disobedience to the rules of and orders of a legislative House or its officers;
- b) Creating disturbances or the disruption of the proceedings of the house;
- c) Knowingly given false evidence before the legislative house or its committee;
- d) Refusal to answer questions put to one by a committee of the house or failure to attend the house of committee when requested to do so;
- e) Influencing any members or officer of the house by way of bribe, reward or benefit;
- f) Publication reports which falsely or scandalously defines a legislative House or any committee.

It should be noted that the above instances are not conclusive. Thus, anything done within the precinct of the legislative house that offends it in whatever form may be regarded as contempt of parliament. Contempt of court is aimed at maintaining the sanctity of courts so that they can adequately discharge their constitutional duty of dispensing justice. There is the presumption in favour of journalist to report or disseminate information to the public without any interference or restriction. However, this presumption is rebuttable especially when it comes to the reporting of proceedings in the court and parliament. The presumption as to the unrestricted right of the journalist to report or pass information is found in section 39 of the Constitution of the Federal Republic of Nigeria, 1999. According to that section of the law "Every person shall be entitled to freedom of expression, including freedom to hold opinions and to receive and impart ideas and information without interference. This presumption is often referred to as the right to freedom of expression and the press. Every responsible citizen, lawyers, journalists, etc. is duty bound to respect the courts.

### **Theoretical Framework**

This Paper is situated in professional ethics of journalism. Ethics is the study of human actions in respect to their being right or wrong. The actions of individuals and social groups supply the subject matter of ethics. There are two types of action - the voluntary - those which we do intentionally and actions that are involuntary. Ethics studies voluntary actions, those that we carry out with sufficient knowledge and choice (Daramola, 1999). Ethics makes a systematic study of our moral ideals and goods, our motives and our patterns of good and bad conduct. In a nutshell, ethics deals with the issue of right living.

Mass Communication (Journalism) ethics is a form of applied ethics or professional ethics that examines ethical principles and moral or ethical problems that arise in the course of news reporting and publishing. It applies to all aspects of journalism practice and is relevant to the conduct of individuals and newspaper organizations as a whole. Applied ethics is a field of ethics that deals with ethical questions in many fields including mass communication. Journalism, like other professions has ethics guiding members and a disciplinary body that enforces ethics. Some of the ethics in the profession are



sanctionable by the disciplinary body of the profession while others only attract condemnation. Ethics of journalism are, therefore, the dos and dont of the profession.

### **Conclusion and Recommendations**

At the inception of this paper, it was noted that the law of contempt could be applicable to court or to a legislative house. In this paper, although our emphasis was on the contempt of court, it is worthy of note that contempt of a legislative house is aimed at protecting the independence and integrity of the house. Contempt of a legislative house is constituted by any act or omission which obstructs or impedes either House of Parliament in the performance of its functions or any members or officers, or more generally, by indignities offered to the House reflecting on its character or proceedings. In Nigeria the law that confers power on the Legislative House to punish any person who defies their privileges or otherwise shows contempt is the Legislative House (Power and Privileges) Act.

Happily, the Nigerian press has been given latitude of freedom by section 39 (1999) constitution (page) and more importantly, section 22 (1999) constitution (Page). 'The section in question empowers the press to monitor governance and hold government accountable to the people. The extent to which the press has used the constitutional provision is wide. Another law that has strengthened the hand of the press is the Freedom of Information Act which was passed and There is no gainsaying the fact that the Nigerian press has done very well to act as watchdog of government. It is on record till today, that it was the record till today, that it was the Nigerian press that exposed the first speaker of the House of Representatives, Alhaji Ibrahim Salisu Buhari in 1999 of forged University of Toronto certificate. The scandal led to the resignation of the speaker. The press also exposed the discrepancies in the name of the first president of the Nigerian Senate, Evan (or Evans) Enwerem. That disclosure forced the senate president to vacate the office. It is also gratifying to note that it is the Nigerian Press that exposed the former National Chairman of the People's Democratic Party (PDF), Chief Olabode Ibiyinka George of misappropriation of funds and corrupt practices in the management of the Nigeria Port Authority. The case against Chief Olabode George by the Economic and Financial Crimes commission led to his trial and conviction to two years jail term. In news writing and reporting, journalists should put the ethics of the profession and laws guiding the profession at the back of their minds. They should as well understand and respect the national interest of their country.

Generally, every Court has traditional power to inflict punishment against recalcitrant party (section 6(6) 1999 CFRN as amended). Thus, the law of contempt is the judge law and the power to punish for contempt is the judge's power. In exercising this power however, the judges are always reminded of the need to treat the matter with utmost caution. Although the offence of contempt of court is a serious one and it is necessary not only for the protection of the courts of justice but also for the preservation of and the administration of justice, there is not enough guidelines as to what form the punishment should take. There is therefore need for reform of the law of contempt of court. However, since criminal contempt is a creature of statute, the maximum sentence for contempt

committed for instance under S.133 of the criminal code is three months imprisonment. In civil contempt, it does not seem clear what limit has been placed on the court's power of punishment whether the punishment be a fine or imprisonment or both. It is worthy of note that in most cases of civil contempt, the court usually adopt the same method of punishment for criminal contempt.

It is interesting to note that in both civil and criminal contempt, the court can order the contemnor to be kept in prison custody until he purges himself of the contempt. It is also important to note that it is possible for the court to pardon a contemnor. Thus, a contemnor whose conduct is unintentional and who purges himself of the contempt by a sincere apology and credible explanation should be pardoned. Also, a court will pardon and discharge a contemnor if he acts unintentionally and from a mistaken belief or misconception of the law thereby flouting a court's order. It must be emphasised that in all cases of contempt proceedings unless the rules of fair hearing have been observed the conviction will be set aside.

The consequence of contempt of court by a party to any proceedings and the exceptions thereto is stated by the Supreme Court of Nigeria in the case of *The Shell Petroleum Development Company of Nigeria Ltd. & Anor V. Chief Isaac Obort-Ntito Torshi & Others* (2023)5 NWLR, where the Court stated that:

*It is generally correct that a person in contempt of an order of Court is precluded from being granted any reliefs while he persists in the contempt. An exception to this settled principle of law is where the person against whom the order is made has challenged the validity of the order by way of an appeal or other application. He cannot be proceeded against for contempt or declared a contemnor until the issue of the validity of the order is settled one way or the other by a court of competent jurisdiction (Ekun JSC: 2008).*

Bearing the above pronouncements in mind, there is need to refer to some peculiar traits of some judges which often spur some counsel or litigants into some form of conclusions. If a judge descends into the arena by asking too many damaging questions certainly it would be utterly stupid for counsel or parties to such a case not to reassess their position. Much as the journalist goes out to gather news for dissemination purpose, he should always abide by the ethics of the profession as laid down, in the Nigeria Union of Journalists ethics and other international associations of Journalists. He must be accurate and fair in his writing.

Recommendations to the media in order to abstain from contempt of court and Parliament

- i. **Truthful, fair and accurate information:** A journalist is expected at all times to tell the truth no matter how bitter. He should be fair by ensuring that news, comments and criticism are balanced.

There shall not be exaggeration; information should be accurate without falsification or distortion.

- ii. **Publication MUST NOT BE Prejudicial to Fair Trial:** In its widest sense, anything which amounts to an improper interference with the due administration of justice constitutes contempt. But probably the most serious interference is a publication which jeopardizes the fair trial of a matter. It is therefore necessary that every trial is a fair trial. A fair trial here means one conducted free from prejudice and in which the court tries the case impartially after considering all the available evidence which has been properly submitted. But what is “prejudice” and fair trial”? At its simplest, the word prejudice is synonymous with the word “impair”, but in order to understand what sort of publication will prejudice a fair trial, the notion of a “fair trial has to be explained.

It is interesting to note that in both civil and criminal contempt, the court can order the contemnor to be kept in prison custody until he purges himself of the contempt. It is also important to note that it is possible for the court to pardon a contemnor. Thus, a contemnor whose conduct is unintentional and who purges himself of the contempt by a sincere apology and credible explanation should be pardoned. Also, a court will pardon and discharge a contemnor if he acts unintentionally and from a mistaken belief or misconception of the law thereby flouting a court's order. It must be emphasized that in all cases of contempt proceedings unless the rules of fair hearing have been observed the conviction will be set aside.

Similarly, journalists are expected to respect the copyright of others. Copyright here refers to the exclusive right of the owners of an invention or author to control his original work. It extends to the control of the reproduction, broadcasting, publication, adaptation, communication, public performance, or any translation of his work. Copyright is also known as property or intellectual right. It covers every literary, musical, artistic, cinematograph work, and sound recording. The purpose of the law of copyright is to protect authors and inventors against theft and piracy of their original work. Copyright expires seventy years from the end of the year in which the author or inventor dies.

- iii. **Rectification of Harmful inaccuracies and right of reply to criticism:** Journalists should rectify promptly harmful inaccuracies in the media, ensure correction and apologize to the offending party. Journalists should apologize to persons criticized when the issue is of sufficient importance.
- iv. **Information should not be obtained by crooked means:** Journalists should not obtain information, photographs and other illustrations by crooked means such as paying or offering bribe to obtain information of public interest.
- v. **Intrusion into private grief and distress:** It is unethical for any journalist to intrude into private grief and distress except for overriding public interest.
- vi. **Protection of confidential information:** As a cardinal rule, journalists should not disclose confidential sources of information. The reason being that such source might be endangered.

In the United Kingdom, the press is forbidden by defense notices not to disclose the whereabouts of certain military arms, armament or strategic military information from being aired or published. This law as may apply in Nigeria is meant to protect national security and our sovereignty as a nation-state.

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