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# LEGAL PITFALLS IN POLITICAL REPORTING IN NIGERIA: SOME LESSONS FROM HISTORY (AMALGAMATION TO THE THIRD REPUBLIC)

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**Abstract**

*Politics is often characterised by turbulence, controversy and downright fighting. As a result, it could turn out to be a minefield for the reporter covering it. This paper examined the basic provisions and defences of three laws governing political reporting, namely, defamation, sedition and contempt of court. It also assembled and analysed some cases arising from them between 1914 and 1993. The study was a library research based on published law reports from various parts of Nigeria stored at the Nsukka High Court Library. Findings showed, inter alia, that the commonest offences political reporters were charged with were defamation and mounting a successful defence was very hard. Findings also indicated that perceived recklessness and repeated offences after warnings or calls for apology heightened the penalties for reporters accused under these laws. In addition, the law of sedition made it difficult to exercise the right of freedom of expression and the press without being accused of writing stories that were actionable by anti-democratic governments. The study recommended, among other things, prioritisation of truth and ethical reporting in general as the best way a reporter can navigate the turbulent waters of politics in Nigeria while discharging his or her duties.*

**Keywords: Political reporting, Defamation, Sedition, Contempt, Court, History.**

## Introduction

Politics permeates almost every aspect of people's lives every day and is thus taken seriously by the news media. This explains why the political desk is one of the most important in journalism and is considered crucial to the sustenance of a free and self-governing country (Strömbäck & Shehata, 2020). While the difficulties of defining politics have been acknowledged in literature (Alexander, 2014), it can be understood as the relations between individuals and groups that pertain to governance, the struggle for and use of power in decision making and running of society at various levels.

Viewed from this lens, political reporting is vast. It extends to the coverage of the three arms of government – executive, legislative and judicial; the various tiers of government – federal, state and local; the activities of parties, groups and political actors at all levels and spheres of society. It covers what is happening at Aso Rock and the traditional ruler's palace plus the intrigues in community level associations to determine in the words of famed political scientist Harold Lasswell, "who gets what, when" and "how" (Lasswell, 2011). Political reporting is indispensable to helping the citizen understand the policies, programmes and operations of government and other groups and organisations that affect their lives relative to power and its exercise (Ohaja *et al*, 2022). It equips the public with information required for crucial decision-making, such as deciding how to vote and what policies to endorse or oppose.

In order to furnish the citizens with information for direct or indirect participation in governance, the political reporter should strive to unearth and disseminate facts irrespective of the blandishments of politicians and in line with journalism ethics (Schulte, 1981; Nwabueze, 2015; Ohaja, 2015; Guidelines for political reporting, 2020).But in Nigeria, many media owners are politicians and reporters who work for them often seek to promote their employers' partisan interests. Political reports are also coloured by the ethnic and religious affiliations of journalists and media proprietors (Okujeni & Ohaja, 2019). The situation is the same when media outfits are owned by government. Political reporters working for them become defenders of the governing party and its officials and hurl vitriol on their opponents (Chukwu, 2015). The resultant skewed reports do a disservice to the public who depend on political reports for guidance.

Just as in other areas of journalism, there are legal checkpoints on the political beat. But the likelihood of arraignment in this area is heightened by the intensity and, sometimes, desperation with which the 'game' of politics is played.

This paper, through library research, canvassed law reports published in Nigeria to analyse cases arising from laws which often ensnare the press, namely, defamation, sedition and contempt of court. Sporadic legislations, such as military decrees, have not been included in order not to make the work unwieldy. During the search for these cases, it was observed that suits concerning political reporting were mostly in the area of defamation. Therefore, cases from beyond our scope, where relevant, were used to illustrate the principles enunciated for the other laws. No rigorous sampling was done. As many pertinent cases as were available were used. Data analysis was descriptive. The circumstances leading to the decision in each case were briefly examined with a view to recommending guidelines for hitch-free political reporting.

The study covered the period from 1914 to1993. This period spans different phases of Nigeria's history as follows: from amalgamation to the end of colonial rule (1914-1960), inception of self-rule (1960-1963), the First Republic (1963-1966),first military interregnum (1966-1979), the Second Republic (1979-1983), the second military interregnum (1983-1992) and the Third Republic (1992-1993). The study was deemed necessary because although there are studies on various media laws, they are often approached from a legal standpoint or their implications for freedom of expression (Nwokolo, 2012; Oraegbunam *et al*, 2018), not from the standpoint of political reporting which this study focuses on.

**Theoretical Framework**

This study is anchored on the Social Responsibility Theory of the Press propounded by Fred S. Siebert, Theodore Peterson and Wilbur Schramm (cited in Asemah, 2011). The theory arose due to the excesses of the press in the libertarian era and the recommendations of the Hutchins Commission in the United States in 1947. The commission had been set up to ensure that in the discharge of their duties, the media did not trample on people's rights and create chaos as a result of their unfettered freedom. Thus, according to the theory, the media were to, inter alia, live up to their responsibilities of providing truthful and balanced information to the public, give fair coverage to the constituent groups in society (Wolfgang *et al.*, 2021), abide by professional codes of ethics and submit to government regulation and sanctions when they erred (McQuail, 2010). The laws that govern journalism are part of the means through which the government oversees media operations.

While undue government interference in media matters is unhealthy in a democracy, given the ubiquity of political affairs and political news and how important the latter is to societal stability and progress, the adherence to some laws becomes inescapable for political reporters. This study looks at three of such laws with a view to advising political reporters on how to navigate their beats for the benefit of society, taking cognisance of the provisions of these laws in so far as they conform to the requirements for civil and productive discourse in society.

Defamation

The law of defamation, which seeks to protect the reputation of persons and corporations, seems to be the commonest source of litigations against journalists. This shows that there are challenges in exercising freedom of expression in Nigeria, particularly in the context of this law (Udofa, 2011). Spoken defamation is called slander while the recorded form is termed libel. The regularity of suits might be because the integrity of the politician or public officer, whether deserved or contrived, is essential for his continued success. Once a public figure is discredited, he stands in danger of being considered a liability both in his professional and social life. However, the transition from fame to ignominy, if it does transpire, is not often maintained in Nigeria because of the relatively low level of enduring public awareness and interest. Nobel laureate, Wole Soyinka, once called this condition collective amnesia – an affliction which makes Nigerians to forget too quickly the transgressions of those who betray the trust the public reposed in them (Ohaja, 2004).

Since charges can be privately pressed for the civil offence of defamation, people who feel wronged rarely hesitate in demanding restitution unless they are poor. Gaining acquittal from a defamation charge is an arduous task for the defendant and his counsel. He & Lin (2017) analysed 523 defamation cases in China from 1993 to 2013 and found that the media are more likely to lose such cases brought against them than win. The situation in other countries, including Nigeria, is similar as the examination below of the impotence of several defences under the circumstances of the cases in point confirms. Reporters also need to bear in mind that criminal defamation exists which can earn them jail time.

Justification

This defence involves proving the truth of the facts in the offending statement. Justification can only be beneficial when the defendant is absolutely sure of the authenticity of the facts. If

one reports a rumour, for instance, he cannot plead justification successfully merely by proving that the rumour existed without proving its subject matter to be true (Lord Greer in Chapman v. Ellesmere, 1932).

In fact, the defence may constitute a mere repetition of the libel as in African Newspapers of Nigeria, Ltd. v. F. C. O. Coker (1969), an appeal against the judgment of the High Court of Lagos State (cited in Nwosu, 1988). The original suit arose from two articles in the *Nigerian Tribune* of Feb. 5 and 11, 1969, which alleged that Coker was found guilty of corruption while he was the Treasurer, Lagos City Council by the Saville Tribunal of Inquiry set up by the federal government. The paper wondered why he was still in public service as Permanent Secretary, Lagos State Ministry of Finance and urged that corrupt men should quit government appointment.

Coker won that case and the subsequent appeal because what the paper described as corruption were some irregularities which the federal government felt were not grave enough to justify his removal from office. The tribunal had dismissed allegations that Coker used his office corruptly as malicious.

Worse still, in the process of adducing evidence to justify a libellous statement, the defendant may make allegations about the plaintiff that are even more grievous than the libel at issue (Ezekwe v. Otomewo, Lessor and God's Kingdom Society, 1957). This situation leads to an exacerbation of damages as does a recourse to another plea after withdrawing an initial defence of justification (Oweh v. Amalgamated Press of Nigeria, Ltd., 1957).

Fair comment

This defence covers non-malicious expressions of opinion based on true facts and made in the public interest (Nylander, 1969). The additional plea of fair comment failed in the Coker case because the *Tribune*'s call for his resignation or dismissal did not take cognisance of the fact that the Saville Tribunal had exonerated him of corruption and the federal government concurred in its White Paper on the tribunal's report. The facts, therefore, did not warrant the comment the *Tribune* derived from them.

Furthermore, the paper had claimed it was commenting on a matter of public interest, namely, the report of the tribunal into the affairs of the Lagos City Council and Mr. Coker in his office as City Treasurer. But it was discovered that the first article entitled "The Devil's Advocate" was primarily a response to a *Morning Post* editorial of the previous day entitled, "Hypocrites, Stones and Glass Houses," which accused the *Tribune* of embarking on a vile and vicious campaign against the Lagos State government on the matter of the tribunal's assignment. The second article was not concerned with the tribunal's report but was a call on government papers to join the *Tribune*'s war against corruption.

The use of such occasions to advance their case against Coker and the persistent, single-minded campaign after the government had absolved him was seen as malicious and this dealt the final blow to the plea of fair comment. It is pertinent to note that malice in law, according to Abbott J. in the Oweh case cited earlier, is not synonymous with "personal spite"

or "desire for vengeance." Rather, it is an "indirect motive other than a sense of duty" or using an "occasion for some indirect purpose."

Sometimes, journalists confuse facts with opinions and then plead fair comment when suits arise. However, judges are adept at separating the two. For example, a front-page article in the *C. O. R. Advocate* of July 8, 1960, entitled "Party Politics and Education: Bassey Okon Ruins Duke Town Secondary School," alleged that Okon was incompetent as principal and so the school was to be downgraded from Form V to IV since the students were performing poorly in external examinations. In the resultant suit, the plea of fair comment failed because the allegations were assertions of fact and not comments (Bassey Okon v. The C. O. R Advocate Ltd and Others, 1961).

What was more, the facts were false. The second defendant, probably the editor, averred that Okon was a competent principal. He further claimed that he did not believe the allegations. Yet, they were given such prominence in his paper, and with a concurrent headline.

Actually, the libellous publication was a response to an article by a certain Bassey Okon published in the *West African Pilot* of June 21, 1960, under the headline "Calabar and the C. O. R. State Ideology." Suspecting that the writer could be the school principal, a National Council of Nigeria and the Cameroons (NCNC) member contesting election into the Calabar Urban County Council, the Action Group (AG) Publicity Secretary (the third defendant) issued a press release upon which the article in the *Advocate* was based.

The release went beyond attacking NCNC leaders to asking why Okon had the temerity to address Calabar, Ogoja, Rivers (C. O. R.) State leaders on political issues when he could not manage a school. This was aimed at counteracting the effect of Okon's article, which the AG believed sought to discredit C. O. R. leaders contesting the council elections. Malice, the court felt, could be inferred from the very fact that the publication was aimed at drawing votes to the writer or his candidates.

On the issue of public interest, Egbuna, J., saw the release and article as serving a parochial political interest.

Similarly, a series of cartoons in the *West African Pilot* of March 21, April 4 and 7, 1959, alleging that the personalities depicted conspired to bribe NCNC candidates who won the 1951 general elections into the Western Region House of Assembly to join the AG, so that the latter would get the required majority, were held to have contained facts, not comments (Williams, Akintola and Awolowo v. *West African Pilot*, 1961).

In Odutola v. *West African Pilot* and P. C. Agbu (1960) also, the paper had in an editorial on Jan. 7, 1958, sneered at the plaintiff's apparent influence as deceptive, claiming that he took 95% of the loans meant for Ijebu-Ode people and had misappropriated other loans meant for subsidising his schools. Dickson, J. ruled for the plaintiff because the editorial contained facts and those facts were untrue.

Qualified privilege

Non-malicious statements made on certain occasions are protected by the law. Such statements must, however, be of public concern and for the public interest. Examples include statements made by a wronged party seeking redress as well as fair and accurate reports in the mass media.

The AG official pleaded qualified privilege unsuccessfully in the Okon case because in responding to a purely political article that was written in a private capacity, he made false allegations about the plaintiff's official performance.

In the Oweh case, the defence of qualified privilege was ruined by the inaccuracy of the offending article. The *Daily Service* of Aug. 8, 1955, published a report gleaned from proceedings at the Western Region House of Assembly on Aug. 3. The article claimed that Oweh was identified by a speaker, Mr. Otobo, as one of the crooks in the NCNC whom Dr. Azikiwe decided to remove in order to restore the dignity of the party. However, Otobo never referred to Oweh in this manner.

The subsequent appeal to the Supreme Court was also dismissed. The article was adjudged unfair since the only portion of the speech reported was the attack on Oweh. Although the court noted that the allegations in the article were less damaging to the reputation of Oweh than the report of the speech in the Hansard, this in its view could not "excuse the inaccuracy of the article" (De Lestang, AG, F. C. J. in the Amalgamated Press of Nigeria, Ltd. and Others v. Chief G. O. Oweh, 1958, p. 166).

In a similar case, reports of proceedings in the same legislative house were published in a newspaper and instead of inserting an apology when contacted by the wronged party; an editorial based on the earlier report was published the following day. The defence of qualified privilege could not, therefore, succeed (Enahoro v. *Southern Nigeria Defender*, 1960).

This defence also failed in Duyile and Sketch Publishing Company Ltd. v. Kelly Ogunbayo and Sons Ltd. (1988). The *Daily Sketch* of Nov. 25, 1977, published an article based on an announcement by the Ogun State Price Control Board. The *Sketch* headline referred to a planned sale of hoarded beer while the board's statement merely mentioned a sale of goods to be held at the Ogunbayo premises.

The issue of damages

Problems associated with damages should always be considered when a media house impugns someone's reputation. There are no fixed price tags for these reputations and as the prices of other items rise, they also skyrocket.

The courts consider the following factors, among others, in stipulating damages: the wronged party's social and professional status (Okon was a member of the Board of Education of Eastern Nigeria), the manner of publication (the *Advocate* article was published in English on July 8 and repeated in Efik the next day to ensure maximum readership), the gravity of the charges published (Giwa was accused of attempting to kill his child for money in Giwa v. Laogun and Others, 1957), and the penitence or defiance of the defendants (the publishers of

the *Eastern Nigeria Guardian* neglected to publish an apology as requested by the defamed in Ikoku v. Zik's Press Ltd. and Another, 1950).

Once damages are assessed by a competent court, the higher courts are usually unwilling to make a downward review (Zik's Press Ltd. v. Alvan Ikoku, 1951) unless the lower court awarded to a non-deserving party, used a wrong principle or the sum awarded was grossly excessive. For example, in the Duyile case, the lower court had awarded the Ogunbayo Corporation N100,000.00 for natural grief, social stress and social disadvantage and N100, 000.00 for loss of profit. But the Supreme Court maintained the Court of Appeal's reduction of damages to N20, 000.00 for loss of profit only because a corporation does not experience the other three states mentioned.

On the contrary, the higher court may deem it wise to upwardly review damages awarded by a lower court as the Supreme Court did in a case involving the traditional head of Ozoro Community in the then Midwestern State (Uyo v. National Press Ltd. and Others, 1974).

There is no doubt about who bears the brunt of these litigations since offended persons may ignore the sources of the damaging statements about them (Benson v. West African Pilot Ltd., 1966), as well as the author of the published article and the editor. In the Benson case, just like in Acka, Benue Printing and Publishing Corporation v. Akure (1987), the source merely spoke the words while the newspaper published them in permanent form. So, he could not be answerable for libel but slander. In the Acka case, Macaulay, J. C. A., speaking for the court, stressed that a man cannot be vicariously liable for the publication of his statement by others.

This situation calls for utmost care especially when judicial and parliamentary proceedings, which are covered by absolute privilege, are reported. No action can succeed against speakers at such fora irrespective of whether their statements are false or malicious. But a newspaper can be sued for any inaccuracy or malice in reporting such proceedings and numerous court cases destroy erstwhile profitable media ventures (Azikiwe, 1970).

The best course to lessening the loss when there is the slightest doubt that the libel can be successfully defended is to publish a retraction at the earliest opportunity as this may fully appease the wronged party and avert a suit arising therefrom.

Sedition

The law of sedition does for the state what defamation does for the individual. It seeks to protect the state from publications that could provoke strife and/or bring the rulers into disrepute.

The ambiguity of Nigeria's sedition law has generated so much debate and some scholars have called for its abrogation or refinement (Okonkwor, 1983; Nwosu, 1988). The provisions are so broad that even mild adverse comments can be interpreted as seditious by mischievous administrations. Worse still, there is no concrete defence and even truth can aid rather than prevent conviction because, according to Blackstone, "truth may be a greater provocation than falsehood and could have a greater tendency to produce a breach of the public peace" (in Karibi-Whyte, 1969, p. 71).

The sedition cases recorded in post-independence Nigeria seem to fall within the periods of civilian leadership. The military regimes were more inclined to promptly incarcerate overly vocal elements with the enablement of decrees than engage in litigation.

During the colonial era, the government did not hesitate to use sedition laws to clip the wings of nationalists (R. v. Agwuna & Others, 1949; Attorney General v. Mbonu Ojike & Others, 1950; African Press Ltd. v. The Queen, 1952). The defendants were convicted in these cases(Attorney General v. Mbonu Ojike & Others, namely,Increase Coker &Zik's Press Ltd., 1950 – cited in Azikiwe, 1970).

Whether the citizens were urged to be willing to sacrifice their lives for freedom (the Agwuna case), were warned not to expect equality of treatment and good government under the British (the Ojike case), or they were urged to avoid deceitful colonial administrators who sabotaged the nationalist struggle (the African Press Ltd. case), the goal of achieving self-government was clearly discernible.

Sadly, the frenetic pace of politics during the colonial period was maintained after independence. The divisiveness fostered by the British, coupled with the public's distrust of the politicians, led people to widely proclaim their discontent. For example, in Director of Public Prosecutions v. Obi (1961), Obi distributed leaflets complaining of self-seeking politicians who abandon the electorate once they assume office while Ogidi wanted the Justice Minister in Ibadan to investigate allegations of AG take-over of customary courts in Warri Division of the then Western Region (Ogidi v. Commissioner of Police, 1960). He circulated copies of his telegram to the minister to the press. Both men were convicted of sedition.

The tottering civilian leadership that took over from the British viewed even properly targeted complaints with displeasure. For example, Nwaobiala v. Inspector-General of Police (1960) resulted from a telegram sent to the premier of a region who was also the leader of his party, urging him to control the nefarious activities of his party men who were besmirching the regional government's image. Nwaobiala was acquitted.

The Second Republic and the second military interregnum also witnessed some sedition prosecutions (The State v. Arthur Nwankwo, 1983 – cited in Nwosu, 1988 – and African Newspapers Ltd. and Others v. Federal Republic of Nigeria, 1985).

Over six decades after independence, the situation has not really changed. And neither has our unwieldy law on sedition. It has, therefore, been argued that it is difficult to find a moral basis for asking journalists to shape their writings according to the provisions of this law. As long as men interact in the polity, disagreements will arise and a law that is so broad in scope that it can be used to suppress all manner of contrary expression can deter robust journalism if religiously adhered to (Nwokolo, 2012).

**Contempt of Court**

The law of contempt seeks to protect public confidence in the courts as remedial institutions. A corollary function of the law is the protection of the integrity of judicial officers, who if

heedlessly castigated may lose the moral authority required for service as instruments of adjudication (Rewane, 1957; Bwala, 2019).

In Aninweta v. The State, 1978(cited in Fawehinmi, 1980), Aninweta, a lawyer, was convicted of contempt for distributing, within the premises of the Onitsha High Court, two affidavits containing scandalous allegations about the presiding officer, Justice A. Obi-Okoye. The affidavits were sworn to by Aninweta and his client and they claimed, among other things, that Justice Obi-Okoye had irregularly reversed judgments in a case already decided upon after receiving graft from the original losers. Aninweta called on the governor, the Chief Judge, the Attorney-General, the Chief Registrar, the Public Complaints Bureau and Police, all of Anambra State, as well as the Onitsha Bar Association to probe the matter. He averred thus: "I am satisfied beyond all reasonable doubts that the judge is corrupt and is not fit to hold any judicial office" (Fawehinmi, 1980, p. 99).

After attempts by the Bar Association to settle the issue amicably failed because the contemnor did not make a satisfactory apology, Aninweta was jailed for contempt, which decision was upheld by the Court of Appeal.

In Regina v. Onwuegbuna and Associated Newspapers Ltd. (1958), the defendants paid fines for an article in the *Eastern Sentinel*, claiming in part, that a discovery had been made of AG plans to annihilate the Zikist National Vanguard with the collusion of certain persons who had agreed to arrest the members and give maximum punishment. The reference was obviously to the police and the judiciary.

Similarly, in Regina v. Service Press Ltd. (1952), the corporation was convicted of contempt for an editorial in the *Daily Service* of Nov. 4, 1952, in which a certain Mr. Sangster, Vice-President of the NCNC, Ibadan Chapter, was alleged to have boasted of his intimacy with white officials, "even" judges. He was further accused of having predicted the judgment in a past famous case accurately and in an on-going case was using the judge's alleged mandate in intimidating witnesses.

Speaking for the court, Commarmond, S. P. J. felt that the word "even" in the context stresses the fact that high court judges who should have known better were meddling in politics.

He was astounded that in order to get at a political opponent, the paper made allegations that could undermine the foundations of the nation's judicial system. And there had been no sign of contrition. He regretted that imprisonment which "would have been a most salutary lesson" could not be imposed because the contemnor was a corporation.

However, Thomas Horatio Jackson had not been that lucky. He published two articles in the Sept. 19 and 26, 1925, editions of his newspaper, *Lagos Weekly Record*, concerning the decision in a case between the government and a citizen. He claimed that the executive arm of government controlled the judiciary such that no verdict could ever be returned against the former.

Jackson was jailed for contempt irrespective of his unreserved and lengthy apology appealing to the court for merciful consideration. Two months, Conte, C. J. insisted, was "a very merciful limit to the period for which Jackson must be committed to purge his contempt" (Rex v. Thomas H. Jackson, 1925).

Just like disparaging articles on concluded judicial proceedings are discouraged, discussions on on-going proceedings are forbidden to ensure fair trial. In Rex v. Ojukoko (1926), the *Daily Times, Nigerian Advocate* and *Eko Akete* were convicted of contempt for mentioning that a man who had been charged with the theft of certain items from Government House, Lagos, had just been released from prison before the theft.

One can be pardoned for a contempt offence when the court deems it fit. For example, on Sept. 2, 1977, Ekundayo, J. discharged a Federal Electoral Commission (FEDECO) officer who failed to conduct an election in the Okene/Okehi constituency as ordered two days before.

The defendant explained that he had received a copy of a new decree from his Lagos office disqualifying anyone who paid his three years' tax in a lump sum. Since this applied to the candidate in the case, he sent a message to Lagos for guidance in view of the court's order and the reply was yet to arrive. The judge was satisfied with his apology that he was unaware he should have intimated the court on this development (Alhaji U. Usman v. Rev. M. O. Durojaiye and FEDECO, 1977 – cited in Fawehinmi, 1980).

**Summary of Results**

In the area of political reporting, defamation seems to be the commonest foe of the press. Accurate, non-malicious and public-serving reporting is the safest and cheapest course to any media organisation's longevity.

Deliberate distortion of information to discredit or buoy up personalities is not only illegal, it is against the Nigeria Union of Journalists Code of Conduct (Nwabueze, 2015). The mass media should not serve as fora for settling old scores or chalking up cheap political points.

When, however, a libel or slander is published unwittingly, the medium concerned should hasten to apologise. Non-publication of retractions gradually erodes the concerned establishment's credibility.

Seditious publication, on its part, seems inescapable under a government that is disposed to applying the law, since it still discountenances truth as a defence. One can only suggest, under the present circumstances, that extremist and reckless statements not be published. For example, urging the people to take up arms against the government or granting independence to a section of the country is inadvisable.

The contempt cases examined show that politicians often attempted to rope the judiciary into their squabbles. The media should resist being used as the platforms for doing so. Admittedly, the nation's judiciary could do with more boldness and autonomy. Still, complaints against particular judicial officers should be directed to the appropriate authorities and not published for public consumption because "To be impartial and to be universally thought so are both

absolutely necessary for giving justice … free, open, and unimpaired current" (Wilmot, J. quoted in R. v. Davies, 1906, 40).

**Conclusion**

Many of the cases reviewed showed the acrimony of politics in Nigeria during the study period. Still the rancour and bitterness that characterised politics then is still observable in contemporary Nigeria. It would be interesting to see how political reporting has fared in terms of litigation during the third military interregnum (1993-1999) and currently in the Fourth Republic.

It is the duty of the political reporter and his editor to vindicate public reliance on them for unadulterated public affairs information. A professional's first allegiance should be to the mission of his vocation and that of journalism is the dissemination of truth, although that truth has to meet established standards of newsworthiness first. Wherever this noble goal is not compromised, the media should diligently avoid tangling with the law. In his autobiography, Nigeria's first president, the late Rt. Hon. Dr. Nnamdi Azikiwe, who owned a stable of newspapers for several decades, commented at length on the folly of courting litigation (Azikiwe, 1970). The huge sums frittered away on litigation could be channelled into such ventures as plant improvement and staff development.

> However, where an appearance in the dock becomes inevitable, the Socratic dictum that likens the law to a cockfight should be remembered. The "litigant who wishes to succeed must try and get an advocate who is a game bird with the best pluck and the sharpest spurs" (Quoted in Manson, 1892, p. 161).

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