

The Functionality of the Election Tribunal in Nigeria concerning Election Petition¹

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This paper scrutinises whether it is possible to have Court-Connected Alternative Dispute Resolution, hereinafter ADR, to cover election petitions in Nigeria. An election petition is a peculiar breed of adversarial matters litigated over in courts, which is exclusively created for the sole purpose of reaching a speedy resolution within the allocated time frame provided by the law. There are no provisions, under the extant legal framework for elections and election disputes in Nigeria, for the use of court-connected ADR to resolve or settle election disputes. The zero-sum nature of Nigerian politics, characterised as the winner takes all; the loser takes none, coupled with the fact that elections are prone to violence and corruption because the seats for grabs are very lucrative- government positions make election disputes unarguably unsuitable for ADR mechanisms. However, the ADR strategy of looking at the interests of the parties rather than at their positions may hold some hope for applying ADR options to election disputes. An interest-based perspective to resolving disputes holds more promise than the traditional position-based perspective. Hence, the paper will analyse what the election tribunal does and whether it has ever used ADR as an option in its history. If not, what hopes are held out that Court-Connected ADR or induced ADR could ever be introduced to disputes concerning an area hotly contested as an election petition? The paper employs qualitative, primary and secondary resources to tackle the above-stated questions.

Keywords: *Alternative Dispute Resolution; Election Tribunal; Election Petition; Political Parties and Nigeria.*

Introduction - Alternative Dispute Resolution ADR in simple terms

The Lagos Multi-Door Courthouse (hereinafter LMDC) Practice Direction on Mediation defined Alternative Dispute Resolution (ADR) as a ‘range of processes designed to aid parties in resolving their dispute outside the formal judicial proceedings.’² On the other hand, Stuart et al. defined ADR as an ‘alternative to litigation, which could be resolved in a more flexible structure by a neutral third party-the process is essentially consensual and confidential.’³

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²Practice Direction on Mediation Procedure, 2008.

³Blake, Browne & Sims (2012) at 22.

Following the above viewpoint, ADR remains ADR, whether court-connected or private. This is because the decisions from or of an ADR arrangement are only binding on parties who have consented to it; not even the court will adopt a decision that is not voluntary from both parties.⁴ In other words, ADR organises fora where voluntary parties come together to reach an agreement.⁵ That mutual agreement reached is binding on both parties. However, it will need the court's intervention to seal it and make it a court's consent judgment for enforcement.⁶

Therefore, it will be easier to attach anybody's account if it is a money judgment or levy execution where necessary. But that does not remove the fact that it is a voluntary decision reached by the parties. As long as the deliberation is an ADR, it is strictly voluntary for both parties; thus, if one party does not agree, there is no agreement, and nothing left for the court to enforce.

For example, if Party XYZ now agrees to terms with Party SSS, the court will have to sit on it and make its judgment. This, in effect, is the summation of the character of ADR because it requires that both parties agree to mediate. However, election petitions in Nigeria are often acrimonious and fought bitterly, involving appeals in many cases to the Supreme Court and the Court of Appeal (C.A).⁷ The question remains whether the inducement of office and the financial gains that follow would ever allow this area of the dispute to be deliberated by ADR.

Interest-Based Mediation

Essentially, the interest-based bargaining perspective seeks to place less emphasis on what is often referred to as traditional adversarial, positional techniques while giving more traction to a collaborative, problem-solving approach.⁸ The elimination of all the inherent conflicts between the parties to the dispute does not appear to be the focus of this process. Rather, this process is based on the idea that conflicts are usually reduced to the barest minimum when we apply factors such as identification of interests, possible options addressing those interests and standards against which to measure the acceptability of such options.⁹ This enhances the chances of reaching mutually satisfactory agreements.

Hence, Interest-based Mediation simply reinforces the interest of the parties.¹⁰

⁴Umegbolu (2022).

⁵Blake, Browne & Sims (2012) at 22.

⁶Umegbolu (2022).

⁷Odili's case cited in Umegbolu (2022).

⁸Bureau of Mediation Services.

⁹Ibid.

¹⁰Litigation has to do with the position of the parties; however, mediation focuses more on their interest as a way of resolving the conflict between the parties.

Election Petition in Nigeria

Election conflicts or disputes have always been bitterly contested in Nigeria; recently, it has been mainly between the two major parties, the People's Democratic Party (PDP) and the All Progressives Congress (APC), though not exclusively.¹¹ The reasons the elections are acrimonious and fought so hard within the tribunals and at the courts are due to multiple factors. Some of these factors are based on the fact that Nigeria, as a developing economy, lacks institutions that could properly supervise elections free from Corruption and inducement of the various offices, to mention a few.¹² Other factors could be the mindset of the politicians who are desperate to win at all costs. Suppose the Constitutional and Electoral Framework of an electoral process is faulty or manipulated. In that case, it may be difficult for such a process to produce results that would be fair and acceptable to the Nigerian people.¹³ It is, therefore, no surprise that elections are often followed by violence from most parties or contestants to gain unwholesome advantages over their opponents.¹⁴ However, the politicians do not carry out these attacks themselves; they pay their 'boys', who are hoodlums, to disrupt the elections. Thus, daggers will be drawn, so many tensions in the air, garnished with gunshots, there is too much of an ugly.

To buttress the point made above, 'the last election in 2019 that returned the current President Buhari into the office for a second tenure was rooted in political violence, some of it was by the soldiers and police officers.'¹⁵ In other words, if someone loses an election and the election is marred with violence, he will not want to settle via ADR but rather with Judicial intervention. For this reason, elections ought to be credible and recognised as legitimate; with the various stakeholders playing by the rules of the game, they must have some level of fidelity to the law.¹⁶ In other words, the laws regulating the conduct of elections and the behaviour of all the political actors, and notably the settlement of disputes as to the former, must be precise and not arbitrary ambiguity and self-contrived lacuna.

In Nigeria's case, the process for settlement of disagreement is ambiguous and has many lacunas, as vividly stated by Ekong and Rufus:¹⁷

'That it is increasingly difficult to negotiate any breach of the provisions of the Constitution both in pre-and post-election procedures as the politicians come to power through means and procedures not recognised by the Constitution and the law.'

¹¹Most tribunal cases involve disputes in the conduct of the election, with the Independent National Electoral Commission joined as parties to the conflicts or disputes in their position- as a regulator.

¹²Human Rights Watch Report on 2007 Elections in Nigeria

¹³Okoye (2013) at 3.

¹⁴Idowu (2010) at 25.

¹⁵Nigeria: Widespread Violence (2019).

¹⁶Umegbolu (2022).

¹⁷Ekong & Rufus (2016).

The thinking behind this is that if someone loses an election and the court refers him to settle in ADR, the question remains 'how can he reach an agreement in such a meeting'? Since he feels bitter that he lost. Thus, he will frustrate the court's time; the case will be referred to court; therefore, getting a voluntary agreement from the election parties is near impossible. Election petitions or complaints are such that if someone wins an election, his opponent insists or says, 'no, I am supposed to be the winner.' It is nigh impossible for both parties to come out as victors, somebody must win, and somebody must lose: a 'winner-takes-all' nature which is not so in ADR.¹⁸ The stakes are high, the political parties or what we call 'players' are desperate, and the spoils of office are enormous.¹⁹ It was here that the behavioural pattern was established as documented in the Elective Principle that Sir Hugh Clifford introduced in 1922, which was used for the Calabar and Lagos Municipal Elections up to the 1946 Council Elections.²⁰ The battery of electoral laws as of 1922 allowed disputes to be challenged and co-opted parties informally to accept the outcome of such decisions. These decisions were not taken by the judicial process but by an administrative process overseen by the Colonial Office or, in some cases, the Governor-General.²¹ The difference then was that the colonial electoral enactment was provided for the participation of a few Nigerians, and voting was conditioned upon tax payment and restricted to adults with an annual income of not less than 100 Pounds Sterling.²² In addition, when elections are rigged or manipulated, those who lose such elections are most likely to reject the results. In such cases, candidates and political parties that participated in an election may question the credibility of such elections before tribunals are set up for that purpose.²³

The cooperation of participants in the electoral process was thus guaranteed in that they conformed to and accepted the process and procedure, which included solving disputes. This was, however, done away with by new electoral rules introduced by General Abdulsalam Abubakar's military regime in a new legal electoral framework that included the Transition to Civil Rule (Political Programme) Decree No.34 of 1998; the National Assembly (Basic Constitutional and Transitional Provisions) Decree No.5 of 1998; and The Presidential Election (basic Constitutional Provisions) Decree No.6 of 1999. These were decrees devoid of political and judicial input and mainly responsible for the current electoral dispensation.

However, there is a new call from the than chairman of the LMDC governing council Hon. Justice Adesuyi Olateru-Olagbegi called on politicians to embrace the opportunity offered by ADR to resolve election petition disputes. With the call coming from a high-ranking member of the judiciary, what was once thought to be an impossible area for ADR has received a signal of possibility.²⁴ What remains

¹⁸Umegbolu (2022).

¹⁹Ibid.

²⁰Eko-Davies (2011) at 10.

²¹Akpan (2017).

²²Babayo, Mohd & Bakri [2018].

²³Ezugworie, Ostar & Albert (2021).

²⁴Umegbolu (2022).

to be seen now is how the political class would respond to this invitation or who would be the first to accept this invitation and crack this sector open to ADR.

Furthermore, to regulate and limit the violence of elections, which are mostly after the results of elections, most parties are engaged in agreements to do everything to cull violence. It is not a subject matter strictly speaking that can easily flow by ADR. However, there will hardly be a voluntary agreement of parties to settle matters, and where there is no voluntary agreement of parties, even the court cannot enforce the agreement.²⁵ Though the law has made adequate provisions such as the Election tribunal, the Election tribunal substantively captures all the features of an ADR; therefore, why not replace Election Tribunals with ADR²⁶?

The Election Tribunal

An Election Tribunal is a constitutionally created special court of Law for hearing and deciding disputes in election matters.²⁷ It is indeed *sui generis* in that it exists in a class of its own, in the sense that it must not be encumbered by the technicalities and procedures of non-electoral matters. Although, constitutionally, it is bound by time limits is expected that speed is of the essence where justice and fairness must not be sacrificed on the altar of technicalities.

It is imperative to point out that election petitions are handled by special panels called tribunals,²⁸ which are not permanent tribunals but are specialist courts set up to deal with election petitions. In essence, there are different types of elections, the local government, state and federal elections even each cadre they have different kinds of elections it could be as the position of the vice president, chairman amongst others.²⁹

It, therefore, follows that whenever there is a petition on any of the elections, the tribunal is set up at that level; thus, the tribunal is speedy. Even the election petition act creates a time limit upon which those matters must start and conclude, which is about one hundred and eighty (180) days.³⁰ Thus that makes the speed of the tribunal a non-negotiable element; in other words, it is swift; it works as fast as ADR. However, recent research conducted at the LMDC pointed out that cases or matters can end within one (1) day or two (2) days or maximum within three (3) months depending on the nature of the case, which is way less time than the time created by the election petition act for the settlement of election matters.³¹

On the other hand, most cases of violations of the electoral act include the non-adherence to the specific rules stipulated in the constitution. These are clear and non-ambiguous. For example, if the campaign time-span rules were violated by both the ruling People's Democratic Party (PDP) and the main opposition

²⁵Ibid.

²⁶Ibid.

²⁷Nwagboso (2011).

²⁸Section 285 of the 1999 Nigerian Constitution

²⁹Oniekoro (2012) at 21.

³⁰Kalu, Obidimma & Anazar (2016).

³¹Umegbolu (2022).

party, the All Progressive Congress (APC). In such matters, it will be difficult to see how ADR will be effective because the issue will not be acceptance of the results but the credibility of the election.³² It is imperative to note that even with the agreements, any contravention of the rules cannot be settled outside of the specifics of the constitution. Perhaps the electoral reforms will address the areas of an electoral process that will be subject to the interference of ADR.³³

The Truce Document

Before an election, the two leading political parties, APC and PDP, will be required to come and sign a valid agreement. That is to say, they will sign a contract that neither of them will cause a commotion if the election does not go in their favour. In simple terms, prior to the election, they would sign the truce document that they would control the excesses of their boys to make sure that they do not go violent or disrupt the election and at the same time advise all their supporters to be law-abiding and peaceful. Hence that agreement is usually signed as a memorandum of understanding. It means an agreement that is not court-connected, an agreement that does not have the force of law but is binding on both parties; however, if a party breaches it, it does not have foreseeable legal consequences; it is a gentleman's agreement. Hitherto, it is expected that the parties to such agreements would honour them. However, in most cases, one person can get to court and rescind because it has been argued and observed that everyone wants to win an election in Nigeria.

Mere looking at it from this angle, it is argued or inferred there is no need to have election petition/political disputes within the ambits of ADR; it will not produce the result needed, nor will it provide the competence required. However, from another angle, why not call it ADR instead of the tribunal? As it has almost all the features/advantages of ADR; one of such advantages was corroborated by the recent research carried out in 2021, where both the users and stakeholders of the LMDC and Enugu State Multi-Door Courthouse (ESMDC) pointed out that ADR is free from an allegation of corruption in contrast to the adversarial system. Emmanuel Ojo's postulation validates the above statement: there are 'perceptions of claims of rampant corruption against tribunal and appeal panellists amongst the public.'³⁴

Consequently, in theory, it is possible to apply ADR in election matters or petitions. However, in practice, it is a more daunting prospect. We can only hope that with the calls from senior members of the Judiciary to the political class -to employ or embrace the use of ADR, sooner rather than later, they will relent and begin to give in to all the advantages that ADR has over litigation.³⁵ Most elections will involve issues that pertain to Voters and Political Party's rights. Such disputes may relate to the right of a qualified citizen to be registered as a

³²Ibid.

³³Ibid.

³⁴Nigeria: Widespread Violence (2019).

³⁵Umegbolu (2022).

voter or of people who come together to form political parties for the purposes of attaining power.

Consequently, or inevitably the rights of a citizen, either as a voter or a member of a party, maybe infringe in the process of seeking their party's endorsement for representation or the right of a citizen to vote. These rights are open to being breached, and to enforce them, the need to have them addressed becomes foremost in the drive for democracy.

Therefore, elections in themselves present legal and constitutional challenges. An example would be where electoral management bodies (EMBs) are under constitutionally required duty to conform to the constitution and electoral regulations in a fair and just manner. In the case of Nigeria, Independent National Electoral Commission (INEC) strives to avoid the label of bias or lack of independence, which erodes or has eroded the credibility of the conduct of the electoral process. Therefore, one way of addressing the citizen and or party grievances is to introduce a fast and inclusive system to address these failures. ADR can be that system.

It is imperative to point out that for elections to be adjudged fair and would mean that it is acceptable to all parties, especially the voters and Political parties. However, it is also recognised that this may not necessarily be the case in all election grievances. To have post-electoral disputes and challenges as a part would be ineffective because they mainly involve challenges to voting and manipulation of the process. Often, the challenges occur after the elections in which INEC is the main defendant. To have a resolution system at this time may be tedious as it usually pertains to the conduct rather than to the rights of the voters and the political parties. It is not certain as to whether the challenges stem from or relate to instances of allegations of fraud or the difficulty of political contestants to swallow the pill of electoral defeat.

Thus, the challenge of the outcome through the judicial process makes it essential to address electoral disputes and their resolution with a framework that acknowledges the participants of the electoral process. It means that the stakeholders and participants such as voters and party members, should be aware of what mechanisms are available to resolve their grievances prior to the elections. This mechanism makes a dispute resolution process fair and allows equal access to all comers without contradicting or making it difficult for INEC to fulfil its primary duty.

High Perception of Corruption

In addition to other notable disadvantages of the adversarial system, this paper has observed further that one of the significant challenges facing the judicial process is the perception of corruption.³⁶ It has been argued that the Election Petition Tribunal process is set up by the Constitution of the Federation to administer justice in cases or disputes relating to election into a political office-

³⁶Oduntan (2017).

one area that is marred with prevalent corruption.³⁷ The entire judicial system has been vehemently criticised for being highly corrupt.³⁸ Most litigants no longer depend on the judicial process, and many have relied on self-help in resolving their respective legal battles.³⁹ The recent END SARS protest that degenerated into bloodshed and sheer lawlessness, which saw the Lagos High Court and some other courts across the Federation vandalised beyond recognition, is a testament to the people's displeasure with the judicial system.⁴⁰ Regrettably, the LMDC situated within the Lagos High Court was not spared.⁴¹ Obviously, there is an urgent need to reassure the people that the Court is there to serve them and that they can always depend on the Court to do considerable justice in their respective matters.⁴² However, this will take much work and some time, but it is achievable. Recent research conducted at the LMDC has found that ADR through the MDC is free from allegations of prevalent corruption'.⁴³ The ADR setup is such that parties would have to agree or come to an agreement on their own with the help of a mediator, thus free from any external interference. Therefore, the tribunal, being a special court, can rectify such agreements.

Consequently, they can do ADR subject to the tribunal's rectification; this will make the work of the tribunal easier; they do not need to be calling for evidence amongst others. Whatever the party's Terms of Agreement (TOA) states, the tribunal can adopt as a consent judgment. This will significantly decongest the courts and create a cordial relationship within the party or between the parties.

Conclusion

The ADR setup is such that parties would have to agree or come to an agreement independently with the help of a mediator; thus, it is free from any external interference. Then such agreements can be rectified by the tribunal because the tribunal is a special court. By and large, they can do ADR subject to the tribunal's rectification, which will make the work of the tribunal easier; hence, they do not need to call for evidence amongst others. Therefore, whatever the party's Terms of Agreement (TOA) state, the tribunal can ask parties if that is what they agreed on and then adopt it as a consent judgment. This will significantly decongest the courts and create cordial relationships within the party or between the parties. This is because one of the chief inadequacies of the current electoral laws in Nigeria is the failure of the Electoral Act to prescribe a specific deadline for the conclusion of legal challenges to election results. While Section 141 of the 2006 Electoral Act states that 'an election petition shall be presented within thirty (30) days from the date the result of the election is declared,' the Act does not put a ceiling on when the tribunals and the court should conclude such

³⁷Ojo (2011) at 110.

³⁸Ibid.

³⁹Umegbolu (2020).

⁴⁰Umegbolu (2022).

⁴¹Umegbolu (2022).

⁴²Ibid.

⁴³Ibid.

petitions. The use of ADR will drastically reduce the timeframe of cases languishing in the national court and also save the tribunal's time. It would also basically comply with the specifics of the constitutional requirements.

ADR is a framework that can provide a straightforward, unambiguous procedure that can apply equally to everyone, ensuring the aggrieved parties' full participation. Though the policies or procedures for resolving pre-electoral disputes may differ from those governing other forms of legal disputes, such as electoral tribunals as they exist now, the legal and formal institutions currently in place are essentially the same in character function, and orientation. But under Nigerian laws⁴⁴ governing the resolution of electoral cases, the respondent does not have the onus of proof. This effect is that there is an unbalanced state against the petitioner or the aggrieved party with an uphill task. Section 138 of the Electoral Act 2002 allows a person returned by The Independent National Electoral Commission (INEC) to retain the office of which the electoral return was provided while the legal challenge to the victory is pending. The attainment of justice should be the only relevant, if not the only goal. National INEC Commissioner Prof Anthonia Okoosi-Simbine⁴⁵ speaking on the core values of the Commission's duty on electoral disputes, stated,

'Our traditional forms of dispute resolution are still with us. We have simply failed to use them. Our failure is simply because we have imbued the litigation process with so much efficacy that we assume that only a judge sitting in judgment over our matters can resolve them. And then, we leave the courtrooms with and continue to dwell in our animosities.'

How does Interest Based Mediation come into play as it looks at the interest of the parties? Since most times the petitioner and respondent do not belong to the same party, it will be difficult to focus on the position. Nevertheless, if interest-based mediation is applied-it focuses on ways of appeasing the petitioner. For instance, where the petitioner is seeking to be declared the winner-in other words, he is not saying that the entire election should be set aside then the options of making him a minister or a commissioner (by the respondent) or giving him other benefits but where it has to do with the nullification of the election perhaps interest based mediation maybe a lot difficult because the party may believe if he contests for the election in court, he may have a reasonable chance of the court to set aside the entire election but then if the court set aside the entire election the court will order a rerun.

Therefore, Interest-based mediation focuses on the interest of the parties and not their positions; thus, by focusing on the interest they will likely achieve a settlement of the election petition disputes, but then it also depends on their respective strengths and the cause of action of the petition and the reliefs they are seeking. Whether the petitioner believes he has a good chance of overturning the

⁴⁴Section 138 of the Electoral Act 2002

⁴⁵Speaking at the opening of a two-day workshop for 60 EADR Focal Persons from 30 registered Political parties in Calabar, Cross River State: Electoral Alternative Dispute Resolution (ADR). <https://inecnigeria.org/news-all/inec-makes-case-for-sustainable-adr-culture-in-the-political-process>.

entire election and ordering a re-run or whether he would rather stick to allowing the election to stand as it is, then he would be asking that the respondent be disqualified because he was not qualified to contest in the first place.

In sum, interest-based mediation entails the interest of the parties- so if the interest is to serve and contribute one's humble quota to the betterment of society, perhaps the petitioner could be given a position in the government of the respondent, or he could port from his political party to the political party of the respondent or they could form a collation between his political party and the political party of the respondent, but then again it depends on the positions they are contesting for. For instance if it is the presidency or a governorship position it could be possible to achieve some kind of a collation however when it is like a house of assembly seat maybe appointing the aides of the petitioner as one of the persons that will work with the respondents those should be options that would be of the interest of both parties.

Recommendation

It is argued that some of the reviewed literature suggested high perceptions of corruption against the adversary method of settling disputes⁴⁶ and tribunals;⁴⁷ hence we recommend ADR for election petition, if not in part. These can be achieved by politicians agreeing to sign legal documents (which are far-reaching and have repercussions) that they must accept election results in good faith or take just legal actions if they are not satisfied with repercussions such as disqualification from future elections to outright bans. It is suggested that ADR through the Multi-door Courthouse (MDC) would, in all probability, be free from such allegations.

The debates, arguments and counterarguments as to whether the intervention of the Judiciary to settle the matters of electoral disputes as such in presidential elections will be against the principle of the nation's constitution. Despite court verdicts regarding the interpretation of the law and addressing the participants' challenges, it will not assuage the people's feelings if the mistrust is against the system and not the process. It is admitted that it will go a long way to stem violence, but that is not the purpose of ADR or adjudication.

References

- Akpan, R.T. (2017). 'Election and Security Challenges in Nigeria: Experience from the Niger Delta 1999-2015' in *International Journal of Political Science (IJPS)* 3(2):1-14.
- Babayo, S., Mohd, S. & M. Bakri (2018). 'Nigerian 2015 General Election: The Successes, Challenges, and Implications for Future General Elections' in *Journal of Social and Political Sciences* 1(2):183-204.

⁴⁶Oduntan,(2017).

⁴⁷Ojo (2011) at 110.

- Blake, S., Browne, J. & S. Sime (2012). *A Practical Approach to Alternative Dispute Resolution*, 2nd ed. Oxford: Oxford University Press.
- Bureau of Mediation Services - [https://mn.gov/bms/assets/Interest Based%20Bargaining%20IBB%20Mediation%20-%20Facilitation_tcm1075-343789.pdf](https://mn.gov/bms/assets/Interest%20Based%20Bargaining%20IBB%20Mediation%20-%20Facilitation_tcm1075-343789.pdf)
- Eko-Davies, O. 'A Critical Appraisal of Electoral Laws in Nigeria' [2011] at 147432939718183_A Critical Appraisal Of Election Laws In Nigeria.docx
- Ekong, J.P. & A. Rufus (2016). 'Electoral Laws and Democratic Consolidation in Nigeria (1999-2015)' in *International Journal of Innovative Research and Advanced Studies (IJIRAS)* 3(12):222-228.
- Ezugworie, Ch., Ostar, Ch. & O. Albert (2021). 'Independent National Electoral Commission and the Prosecution of Electoral Offences in Nigeria: Is the 2010 Electoral Act Implicated' in *International Journal of Business Management and Economic Review* 4(1):50-65. <http://doi.org/10.35409/IJBMER.2021.3229>
- Idowu, O. (2010). 'Corruption, The Police and The Challenges of a Free and Fair Election in Nigeria' in *Journal of Sustainable Development in Africa* 12(7):52-63.
- Kalu, U.C., Obidimma, E.O.C. & A.O. Anazar (2016). 'Time limitation in Election Petitions in Nigeria-International' in *International Research & Development* 5(4):41-54.
- Nigeria: Widespread Violence Ushers in President's New Term (2019) Human Rights Watch.
- Nwagboso, C.I. (2011). 'Elections and Electoral Tribunal in Nigeria' in *African Research Review* 5(2) - DOI: 10.4314/afrrrev.v5i2.67304
- Oduntan, G. (2017). 'Prescriptive Strategies to combat corruption within the administration of Justice sector in Nigeria' in *Journal of Money Laundering Control* 20(1):35-51
- Ojo, E.O. (2011)., 'Public Perceptions of Judicial Decisions on Election Disputes: The Case of 2007 General Election in Nigeria' in *Journal of African Elections* 10(1): 101-113 - DOI:10.20940/JAE/2011/V10I1A5
- Okoye, F. (2013). 'The Prosecution of Election Offenders in Nigeria: Challenges and Possibilities' Discussion Paper 5, (sept. 2013). Nigeria: Friedrich-Ebert-Stiftung.
- Oniekoro, F.J. (2012). *Practice notes and guides on litigation (civil, claims and criminal trials)* 3rd ed. Enugu: Chenglo Ltd.
- Umegbolu C.S. (2022). 'Dispensation of Justice: Lagos Multi-Door Courthouse (LMDC)' in *Athens Journal of Law* 8(3):279-308.
- Umegbolu, C. (2020). 'End SARS: A Revolution by the people for the people on police brutality in Nigeria'. Research group Brighton Doctoral College, *Law, Society and Justice Research and Enterprise Group*

