Contempt of Court's Order and Nigeria's Executive Arm of Government.

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Abstract

There are three arms of government, the Executive, Judiciary and the Legislature. The running of governance depends on them. The society is sane and orderly, is because they all work together in harmony. Even though there is separation of power between them, yet there must be synergy between them. There must be corporation, and respect among them. None should see the other as being inferior or subordinate to the other. The Court is the arm that interprets the law enacted by the Legislative arm of the government, while the Executive carries the pronouncement of the court into action. The problem in this case in Nigeria is that, the executive arm most of the times, has looked upon the judiciary with disdain, disobeying their order with impunity since they have the military and paramilitary on their side. The methodology used in the Paper is Phenomenological. The source of data is mainly secondary where Books-Newspapers and Internet were consulted. The paper found out that in Nigeria, the executive arm of the government sees herself as the arm `in-charge` of other arms especially the judiciary. It should detect the modus operandi, and where this is not possible, the order of the court is disobeyed. If every arm of government works against each other, the society will be a jungle, survival of the fittest; chaos and anarchy will be the order of the day. Therefore, this Paper recommends that the executive should obey court orders even when they are favourable to it in order to have a harmonious and civil society.

Key words- Contempt, Court, Order, Executives.

Introduction: It is a natural phenomenon that when an order is given or made as the case may be, the sequence is that that order should be obeyed especially when it is given by a constituted authority like the Courts in Nigeria. The courts are

established by law of the land to adjudicate matters between individuals, groups, and between the government and the citizens. The government in this case is the Executive arm. But in recent times, it has been seen that the executive arm has exhibited disobedience to court`s order thereby making mockery of this arm of government. Unini Chioma has this to say on this development:

> The Judiciary has been said to be the last hope of the common man. As an umpire in the arena of governance, it is expected to maintain a reasonable level of independence, in that, nobody should be able to influence it. As the arm which interprets the law, it checkmates the actions of other arms of government to ensure that such actions are performed within the prescribed boundaries of the law. This is in furtherance to the principle of the rule of law. The Judiciary as an arm of Government needs the corporation of the executive and the legislative arms of government, so that there will be a smooth ride on the wheels of governance. However, where any of the arms fails to give the expected support, by disobeying court order, the arena of governance will only invite chaos to the fore. The Nigerian Democracy has several times suffered disrespect to the judicial arm. Most worrisome is the fact that heads of the executive arm have been notorious for such unrighteous act. While they perhaps show such scorn for their individual aim, little do they know that there is far-reaching consequence(s) that follows which the society will take no-aeon to recover from. (Chioma Unini)

It is painful when one is betrayed by his enemy, but it is more painful when one is betrayed by one whom he is expected to protect him. That is the situation here. The executive is expected to help the Judiciary to make the society sane, but it has turned around to water down the efforts of this arm, making it to be brought low in the sight of the citizens. No wonder Bamidele Kolawole said:

In Nigeria, it has been discovered that we do not value the rule of law which makes the judgment or ruling of the court to be enforceable. In recent times, it becomes obvious that the decisions of the court are mostly flouted, ignored and

regularly violated by the functionaries of the Government as they glaringly see themselves being above the law and such impunity is yet to be generally addressed.(Bamidele Kolawole) In a sane society, the orders or rulings of the court must be obeyed. It does not matter the body or the person. It may be the government, religious organization, or even company. All are obligated to obey court order. This is the situation. As far as the order is subsisting, it must be obeyed. "It is necessary to point out that a judgment of Court remains subsisting and valid. It must be obeyed even if the person affected by it believes that it is void." (Kolawole) The order is not only to be obeyed, it is also binding to the affected.

> Unequivocally, any judgment of a court must have a binding effect on any party to the suit; which means parties must be willing to obey and comply to the letter with the order or judgment of the court, this is showing respect to the laws of the land. It must be noted that the law is above anybody in the land, this asserts the supremacy of the law of the land. (Kolawole)

Disobedience to court order may be inside or outside the court. If it is done in the face of the court, it is *in facie curiae*; while outside the court, it is *ex facie curiae*. (Chioma)

Contempt: "Disobedience of a court order simply amounts to Court Contempt." (Chioma) It is further defined by the same author "as any conduct which tends to bring into disrespect, scorn or disrepute the authority and administration of the law or which tends to interfere with and/or prejudice litigants and/or their witnesses in the course of litigation." (Chioma) In other words, action is taken willingly to nullify the action of the court.

"Contempt of Court means the offence of being disobedient to or disrespectful of court of law and its officers." (Kolawole) Not only is the disrespect to the order by the court, it also extends to her officers.

"It is a willful disobedience or disregard to court orders in order to obstruct justice." (Kolawole) In this case, the affected person does not only disobey the order, but goes further to obstruct justice in his own way and manner. The summary of contempt in this case is the act of anybody or government disobeying the directive of the court.

Executive: "Belonging to the branch of government that is charged with such powers as diplomatic representation, superintendence of the execution of the laws." (Merriam Webster Online Dictionary)

Order: "A specific rule, law, or authoritative direction." (*The Complete Christian Dictionary For Home And School.* (1992).p.475)

Court: "A place where justice is administered." (*The Complete Christian Dictionary For Home And School.* 144)

The paper is saying that this place where justice is sought, which is being authorized by law to do the same; when it gives an authoritative direction to the arm of government that is charged with the execution of laws, and it disobeys it, such disobedience amounts to contempt of court-Disobedience to court order.

Rule of Law: The paper is aimed at making everybody including the executive, to know that before the law, all are equal. If that is the case, the implication is that it should not see itself as above the law. This is because "The rule of law `means that no one (including the government) is above the law.` The United Nations declares, `Human rights, the rule of law and democracy are interlinked and mutually reinforcing and they belong to the universal and indivisible core values and principles of the UN.`" (Kolawole) Daniel Bernard is one of the advocates of the rule of law; one of those who disdain the Nigerian government attitude towards its violation. According to him, "The rule of law in Nigeria is becoming subject to the dictate of those in authority as security agents await executive orders to validate court decisions." (Bernard Daniel) Consequently, it is obligatory that in order for the rule of law to be effective, the order of the court must be obeyed. It is not for the person or body to decide whether to obey or not. "A person against

whom an order has been made by a court of competent jurisdiction has an unqualified duty to obey that order until the order is discharged. It is not for the person against whom the order is made to say that the order is null and void or whether it is irregular. It is another court to so declare." (Chioma)

Types of Contempt of Court: Officially, there are two types-Civil and Criminal. "Civil contempt usually involves someone`s failure to comply with a court order, in which case the judge is likely to use sanctions that force the non-compliant party to fulfil the court order that had previously been ignored. Criminal contempt charges are punitive, meaning that they are intended to prevent future acts of contempt." (Kolawole)

Unini Chioma has this to say on the same subject:

> Contempt could be criminal or civil. Criminal contempt basically deals with those actions that directly affect the administration of justice. It involves actions that tend to prejudice a fair trial, or even interrupt the proceedings of the court. Statements when made that also scandalize the court of law, or a judge amount to criminal contempt. Civil contempt on the other hand involves the wilful disobedience of court order. (Chioma)

If one misbehaves, a Judge may warn the person. But if he continues in his action, he may be in contempt of court. Why the misbehaving person is warned is to give him chance to correct his behaviour in order not to face legal sanctions. The Judge may equally charge a person of contempt without initial warning. (Kolawole)

Why Disobedience To Court Orders By The Executive? It has been said before that one of the reasons the Federal Government selects which order of the court it will obey, is because it has the military and paramilitary at its disposal. The execution of court orders depends more or less on the executive. So, if it decides not to obey, who will execute the order against it? That is why it disobeys court order with impunity.

It has also justified itself for not obeying court order based on security reason. In the case of Dasuki, the former The Attorney General of the Federation-Abubakar Malami and the former Head of State-Mahamadu Buhari, were of the opinion that public interest must override individual`s rights when the court gave order that he should be released on bail. According to Malami, "When a personal right clashes with public rights, then the government is safe to infringe on such rights. Mr Dasuki is a matter of public interest overriding an individual`s rights." (Bernard).

Former President Buhari, while addressing the 58th Annual Conference of The Nigerian Bar Association, especially concerning national interest and The rule of law said: "Rule of law must be subject to the supremacy of the nation`s security and national interest."(Bernard) To Malami and Buhari, they have a different Constitution and legislation that warranted them what they relied on. That led a Senior Advocate of Nigeria, Chijioke Okoli to say that: "The government [Buhari`s] and the attorney general cannot be the court. This government came into power by acts of law. And if it chooses to disregard court orders, that is lawlessness and it is an invitation to anarchy. This government is a government of law." (Bernard) One begins to wonder how somebody because he was in power could act contrary to the laws guiding the nation and ignored the court. When he would leave office and another government would infringe on his rights because of national interest, he would go to the court he ignored her order for a redress. One will not be a judge and a prosecutor in his case. Of course, nothing was done to invoke contempt of court against them because of the immunity of the President.

The Necessity Of Charge Of Contempt Of Court: It makes people (culprits) to think before they leap; checkmates the actions of people who are laws to themselves; makes people sane, and gives credence and respect to the orders of the courts.

> The rules embodied in the law of contempt of court are intended to uphold and ensure the effective administration of justice. They are the means by which the law vindicates the public interest in due administration of justice. Not only so, the law relating to contempt

> of court is designed for a show of raw power of Judge. It is to boost his ego or advance his personal aggrandizement.(Chioma)

Examples Of Contempt Of Court

*Godwin Emefiele***:** The court granted Emefiele bail on 25th July 2023 to the tune of N20 million Naira and ordered that he be remanded at Ikoyi Correctional Centre until he would perfect his bail condition. However, "The DSS rearrested the embattled bank chief after fighting off NCoS officials on the court`s premises." (Lukman Olabiyi.2023.p.5.)

Nnamdi Kanu: He has been in detention since June 29, 2021 when he was renditioned from Kenya by the Federal government. Since then, he has been in detention despite court`s order to release him unconditionally. But the government has refused to obey this order. According to Mike Ozekhome (SAN), Counsel to the accused, he told the Supreme Court that she should

> Uphold our cross-appeal, in order to do substantial justice to this matter and to the Respondent, who has been in detention since June 29, 2021, even after the lower court ordered his release and that he should never be prosecuted again on the same courts. They are still holding him unconstitutionally. We pray my lords to deliver justice and use this case, just like in Ojukwu Vs state, to demonstrate that no man or government should be above the law.(Godwin Tsa. (2023) p.4.)

It will be remembered that Abuja division of Appeal Court had already ordered the government to release Kanu in October 13, 2022. All this fell on deaf ears of the government. This was made known by Godwin Tsa. He said:

> The Abuja division of the Court of Appeal had, in its judgment delivered on October 13, 2022, ordered Kanu`s release from detention. A three-member panel of the appellate court, in a unanimous judgment, equally quashed a 15-count terrorism charge that the FG entered against the detained IPOB leader, before the Federal High Court in Abuja. The court said it was satisfied that the

> FG flagrantly violated all known laws, when it forcefully rendered Kanu from Kenya to the country for the continuation of his trial. It held that such arbitrary use of power by the Nigerian government divested the trial court of the jurisdiction to continue with Kanu`s trial. (Godwin Tsa. (2023) P.4.)

Kanu`s American Lawyer, Bruce Fein, has also lent his voice for the release of his client. In the letter he sent to President Bola Tinubu, he wrote:

> You confront a choice between becoming a firefight (sic) or being the fire. The former would crown you with a possible Nobel Prize. The latter could consign you to Dante`s Seve Circles of Hell as portrayed in his Divine Comedy. You would become a firefighter by immediately ending the criminal, illegal detention of Nnamdi Kanu as ordered by the United Nations Working Group on Arbitrary Detention and Nigeria`s Court of Appeal over a year ago. (Dailysun. (2023)p.6.)

As at the writing of this paper, nothing has changed. The status quo is subsisting. The government is adamant.

Ogun State Government: The people of Ajegunle-Araromi community in Sagamu local government in Ogun state were not happy with their government. The reason being that the State government through the State`s Bureau of Lands and Survey, accompanied by the Police, demolished their properties. According to the members, the government was about to sell their land to a Chinese company without compensating them. They went to court which restrained the government from the demolition. However, the action that latter took place showed whether the government obeyed the order or not. Oduwole Olusoga, the Legal Adviser to the community, said that "The state government failed to obey a court injunction refraining it from demolishing their houses. They have no right to demolish our property but the matter is already in court, the court adjourned the case, the government supposed to wait until further notice from the court." (Hakeem Adegbenro.) Respect for court order went to thin air.

Michael Chinedu Okwuonu and Abia State Police Command: The accused was detained since 2021 by the above command. But the Command has disobeyed a valid order of court with competent jurisdiction to release the accused. They neither released him, nor charged him to court. The family went to court which gave order for his release, but to no avail.

The court

> Ruled that the arrest and continued detention of Mr Micael Chinedu Okwu the fundamental human rights of Okwuonu as guaranteed by section 35 of the constitution of the Federal Republic of Nigeria (as amended), and therefore, illegal and unconstitutional. Unfortunately after over seven months the judgment was delivered, police had yet to obey any of court`s orders. (Okey Sampson.)

Governor Ganduje and Installation of Emirs: The former governor of Kano state, Ganduje created additional Emirates. The court ordered him not to install the new Emirs "Pending the determination of a motion on notice filed before it." (Chioma) The State government ignored the court order, "issued appointment letters to the Emirs and installed them." (Chioma)

Sambo Dasuki and ECOWAS Court: Nigeria government recognizes this "regional court, created to adjudicate on all legal disputes centred on human rights through the Charter of the Commission." (Bernard) There are cases in the nation where the federal government ignored the orders of this court. One of them is that of Sambo Dasuki, the former National Security Adviser to President Jonathan. He was arrested in 2015 and detained because, according to the government, he diverted funds meant for arms. Nigerian courts granted him bail. The government refused. In 2016, he went to ECOWAS Court. The court granted him bail.

> but the Buhari-led administration through the DSS, refused to release him. the continuous detention of Dasuki against the international court`s order prompted the Court of Appeal Abuja in July 2019, to declare the continued detention of Dasuki by the DSS unlawful and unconstitutional with a fine of N5 million to be paid

> as compensation for breach of his fundamental human right. But Dasuki spent four years in detention before he was released despite a court order granting him bail. (Bernard)

Free Education For Children: Nigeria government also refused to implement ECOWAS` judgment "for the provision of free and basic education for Nigerian children as enshrined under chapter two of the Nigerian contribution, in SERAP V. Federal Republic of Nigeria & Anor." (Bernard) This had made the court not to have drastic measures against the nation, thereby weakening its authority.

Ibrahim El-Zakzaky and Wife: His followers clashed with the Nigerian army. He and his wife have been detained since 2015 without trial by the DSS. At least 347 members of the group and one soldier died. (Bernard)

> The Federal High Court sitting in Abuja on Dec. 2, 2016 ordered the unconditional release of him and his wife from detention within 45 days aside the provision of accommodation and N50 million in damages. This court order was ignored. A further notice of disobedience was issued against the Attorney General, Assistant Inspector General of Police, and the DSS for failure to comply with the order seeking their release, yet it was ignored (Bernard)

Gloria Okolie: Her crime was that she was accused of affiliation with proscribed Indigenous People of Biafra (IPOB). She was arrested in June 17, 2021. At High Court Abuja in August 27, 2021, her bail was granted, with the ultimatum of her release on or before September 31, 2021. As at the time this post was made, she was still in detention. (Bernard)

Followers Of Sunday Adeyemo: Sunday Adeyemo, popularly known as Igboho, the Yoruba nation separatist leader, his followers (12 of them) were detained by the DSS. They were still detained even bail was granted to them "by the court as reported by HumAngle, is an act of contempt and disregard for judicial orders." (Bernard)

Admiralty Fleet Ltd and Admiral Festus Porbeni: These brought a suit restraining Lagos State from "allocating any portion of a property at B20, Wole Olateju Crescent, off Admiralty Way, Lekki Phase 1 in Eti-Osa Local Governemnt Area, pending the hearing of the substantive suit." (Wale Igbintade) The court granted this restraining order on 18 October, 2021. What did the government do? They

> appealed against the order and followed up by allegedly re-deploying the Lagos State Task Force and police unto the site in breach of the order of injunction. They allegedly brought a bulldozer onto the site at about 4am on October 20, 2021, and under the cover of darkness, demolished structures on the site with the Lagos State Task Force policemen providing protection for those flouting the injunction. (Wale Igbintade)

Patrick Okoli: He was unlawfully sacked from Police Force. He went to court for redress. A Federal High Court in Abuja reversed the sack and ordered his reinstatement during the tenure of Alkali Baba Usman as the Inspector General of Police. This order was made on 21, October 2021. The "order was not obeyed until the IGP was to be committed to prison." (Kolawole)

Consequences of Not Obeying Court Order:

The Executive arm of the government that is the focus of this paper, is not mostly affected with the consequence of contempt of court because of their immunity. However, they could be bear the consequence after their tenure, except in Nigeria where an executive member especially the President and the Governors are seen as sacred cows. That does not mean in an way that the society does not take notice of such behaviour.

Lawlessness: Lawlessness is enthroned where court orders are ignored by the executives. There will be breakdown of law and order. Chaotic state will be the scenario. According to Bamidele Kolawole, "When this happens, it will most likely degenerate to total breakdown of law and order." (Kolawole) He continued: "When we allow the very foundation of adjudication to be eroded, then we should be ready to say `good bye` to Rule of Law, peace and orderliness and welcome to `anarchy`, and `chaos` and the whole society suffers for it." (Kolawole)

To Justice Rabi Gwandu of the National Industrial Court, he "once publicly scolded lawyers and parties that were involved in such practices of flouting orders of court, warning that disobedience of court erodes confidence in the system and failure to check it will breed anarchy." (Kolawole) The same was said by Justice Daniel Osiagor of Federal High Court Lagos. He "warned that disobedience to court orders is a recipe for lawlessness and chaos, stressing that such conduct erodes confidence in the system and failure to check it will breed anarchy." (Igbintade).

Indiscipline: Discipline is when the society obeys the rules and regulations. This leads to sanity and smooth running of the society. The reverse is the case where indiscipline is being exhibited especially by those who ought to help in the maintenance of law and order.

When the then Military Administrator of Niger State, Col. Emein abused the order of the court with the Attorney General of the Federation, Justice Muhammad of Court of Appeal this:

> It is indeed a sorry situation that such highly placed Government functionaries should descend so low to disobey a clear order of this Court with reckless abandon. They are supposed to set good example for the people to follow, but instead they tenaciously promoted **indiscipline** of the highest order by openly promoting lawlessness in our nation from vantage point of their seat of power. It is indeed very regrettable to place such type of people in a position of authority. I am of the firm view that for a nation such as ours, to have stability and respect for democracy, obviously rule of law must be allowed to follow its natural course unencumbered. If for any reason, **the Executive arm of government** refuses to comply with the court orders, I am afraid that arm is promoting anarchy and **executive indiscipline** capable of wrecking the organic framework of the society. The corporal existence of Nigeria, it must be admitted postulates the principle of co-operation between the three arms of government (Executive, Legislature, and Judiciary),

> where these work together in the same framework, then the rule of law shall prevail in that society. But where each selects to work in isolation and or in utter disdain of the other, then havoc wrecks the society. (Ebi Robert.)

Mockery of the Judiciary: An arm that should be respected, obeyed to the letter, will be seen as an arm meant for public ridicule; being treated with disdain due to contempt. Ordinarily, no one will be happy if his order is not obeyed not to talk of that from a competent court. Ayomide Ogunsakin, a human rights lawyer and retired lecturer of law in Lagos State said when the government refused to released El-Zakzaky, "The act of disregard for prompt enforcement of court order makes a mockery of our judicial system." (Bernard)

Threatens Democracy: Democracy thrives when there is rule of law. But when this is not the case, it is thrown to the wind. the society suffers while the proponents of its destruction `enjoy`. In his write up, Bamidele Kolawole said: "It is pertinent to aver that defiance of court orders threatens democracy in Nigeria and if such attitude is not nipped in the bud, it will continue to ridicule the Judiciary which is seen as the last hope of a common man." (Kolawole)

Self-help: When court orders are not obeyed, there will be no need to go to court. Everybody will resort to self-help; finds ways to survive and succeed. The society then will be a jungle, the land of animals. In a democracy, self-help is an aberration. Unfortunately, that is what it will be in such circumstance of disobedience to court order. To Kolawole,

> When the government becomes lawless, other segments of society will lose confidence in the courts and resort to self-help. When the pronouncements of a court are not enforceable or obeyed, even felons will be encouraged to commit more crimes and that could further add to the bane of the society. Regrettably, Nigeria is threading this path with the unconscionable disregard for court orders by public officials." (Kolawole)

Derogation of the Rule of Law: In other words, disobedience to court`s order belittles the rule of law which states that everybody is equal before the law. It makes it of no effect, null and void. That will be, making separate laws for separate people in the same society. "Defying Court order, ruling or judgment will simply amounts to contempt of court, which if not reprimanded will lead to Degradation of the Doctrine known as `The Rule of Law." (Kolawole) Continuing he said: "Disobedience to court orders and judgment weakens the respect for rule of law, respect for human rights and would also promote distrust and disbelieve in the judicial system of our dear country." (Kolawole) Finally he opined that "The essence of the law would be ridiculed if court orders are flagrantly disobeyed. The rule of law is to create order, disobedience therefore paves way for chaos, thus reducing the advancement of humanity to its primitive and barbaric times." (Kolawole)

Denial of Right to be heard and Litigate: The following consequences will follow for not obeying court order. One, it will deny the litigants the opportunity to be heard, and two, makes suit incompetent. "Ordinary cost awarded by a Court against counsel or litigants in civil matter must be obeyed without delay, otherwise the right to be heard, which a lawyer enjoys exclusively, could be taken away temporarily until the cost is paid up. Consequently, non-compliance with the order of Court makes a matter or suit incompetent." (Kolawole)

Imprisonment: One of the consequences of not obeying court order is imprisonment. The culprit risks being remanded in the Correctional Centre. "Section 72 of Sheriff Act provides for committal for refusing to comply with order, it provides that the court may order that such person be committed to prison and detained in custody until he has obeyed the order or things that are to be immediately performed." (Kolawole)

Primitivity: When court`s orders are ignored, it brings back evil and dark days. It will send light out of the way; bringing back gloomy days back without sanity. The implication is that we are shown the light, but we decided to enjoy darkness; saw clear road but decided to enter into the bush where there are thorns and thistles. It is a situation where we are bringing back black history; no

enlightenment and positive progress. "It is without doubt a step backwards in human civilization when a court is disobeyed." (Kolawole)

Conclusion: There must be mutual corporation especially between the Executive and the Judiciary. The judiciary is not inferior to the executive. The courts are by law to be obeyed by all citizens including the executives. Where this not the case, lawlessness, chaos. Indiscipline and threat to democracy are enthroned. Courts` order must be obeyed by the executive to the letter. No government, be it Military or Civilian should encourage contempt; they should not condone it; they should frown at it. the executive owes as a duty to obey courts` orders.

However, President Bola Tinubu`s government has 8-point agenda. One of them is "Rule of law." (Hammed Sani. (2023).p13.) It is hoped that this government`s policy will not be hypocritical.

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