

TOWARDS A VIABLE LANGUAGE OF HUMAN RIGHTS ACTIVISM IN NIGERIA

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Abstract

This paper explores the possibilities of achieving a viable language of human rights activism in contemporary Nigeria. It argues that the style of language of human right activists is predominantly violent, harsh and incapable of achieving the crucial goals and visions of human right activism in Nigeria: The methodology is analytical and empirical. In its analytical approach, it discusses the meaning and roles of language in societal cohesion. Its empirical character derives from the collation and analysis of data of some selected speeches of Nigerian activists on violation of citizens' human rights, conflict resolution and effective democratization process. Finally, while recognizing the pivotal role of human rights activism in contemporary Nigeria, the paper emphasizes the need to inject humane linguistic items that reflect a measure of respect, integrity and modesty in the language style of human rights activists. This is necessary in order to achieve dialogue, understanding and consensus on controversial issues among human rights activists, government functionaries and stakeholders in the Nigerian state. This is the only viable path to sustainable democracy and human development.

Keywords: Language, human rights, activism, Nigeria

Introduction

It is universally acknowledged that every individual and citizen possesses certain definite political, civil, economic and social rights, which are fundamental to his/her dignity and personhood. Theoretically, these presumptuous ideals hold sway in the constitutions of countries of the world, Nigeria inclusive. However, in reality and with respect to Nigeria in particular, the treatment of human rights by successive governments can hardly be reconciled with constitutionalism as there are always cases of infringement upon citizens' fundamental

rights. Over the years, experiences and events under both military dictatorships and civilian administrations have indicated gross abuse of citizens, human rights through state machinery; poor or total neglect of the enforcement and protection of these rights by government; and the numerous international conventions (like the Universal Declaration of Human Rights, 1948) and regional charters (like the African Charter on Human Rights). Human rights activism evolved in critical reaction to these violations.

Human rights activism in Nigeria is beset with some problems which adversely obstruct its laudable visions and goals. Ayo Obe, a renowned Nigerian female activist and former President of the Civil Liberties Organization (CLO) in Nigeria, reviews the problems confronting human rights activism in Nigeria. According to her, the problems are three-fold: the problem of Nigerian human right groups and activists themselves; the problem of the Nigerian government; and the problem of the Nigerian people.¹

On the first problem, she observed some human rights groups and activists are not genuinely focused – some are more liberal, while few are beyond the fringe. On the second problem, she maintains that the arbitrary, unaccountable, vindictive, lawless and self-deceiving government under which human rights groups and activists struggle to operate, constitutes the greatest problem facing human rights activism in Nigeria. On the last problem, she said Nigerians do not usually have confidence in activism and in themselves; as a result, such attitude and beliefs discourage virile and effective activism.

While one is not totally at variance with Obe's observations and positions, one's concern is that a close examination of human rights activism in Nigeria will reveal that beyond her observations, there is a salient and more critical language problem. The language of human rights activism in Nigeria is at the centre of the problems identified by Ayo Obe. In this paper, we shall show how the language of activists has obstructed human rights activism in Nigeria. Furthermore, we shall attempt to construct linguistic principles for a viable language of human rights activism in contemporary Nigeria.

Meaning, Nature and Functions of Language

Human language is so unique that the raw materials (sounds) that constitute its make-up can be organized to express different levels of communication. From the limited finite system that makes up human language, different types of discourses and styles can be achieved.

Language is so much connected with human nature to the extent that it constitutes the focal point of human lives and activities. It is important to recognize the tripartite functions of a noble human language as given by M.A.K Halliday namely: Textual, Ideational and Interpersonal.² The textual aspect relates to the cohesive devices that enable men to author a text, and which makes for permanent recording of the local symbols of man.

The ideational function is the cognitive meaning of a piece of language use. That is, a speaker's experience about the world around him can be expressed and this is what makes a writer or a speaker to assume a prominent role in analyzing or relaying his experience.

The interpersonal function of language makes for interaction and the social integration of man in society. It sees man as a social being and not a recluse or a hermit; as one who necessarily must engage in verbal exchange with other people in society. Generally, language performs a myriad of functions in society. Put succinctly, it enables man to be cooperative in the formation of a peaceful and harmonious society.

Among other things, language allows for communication, conflict resolution, acquisition of culture, and promotion of ideas and influence. The main essence of language is manifested when it is used; that is why Halliday comments that "language cannot be experienced in isolation."³ Brook too affirms this when he opines that different behaviours of human beings are reflected through language.⁴

Added to or in consonance with the basic functions given by Halliday, language is used for other purposes. It could be used for the expression of emotions which is shown by the ability of persons to pour out the much bottled 'nervous energy'⁵ when such persons are under duress. In this regard, language can be used to show annoyance, anger, doubt and anxiety. In the same vein, language is also very effective in social interaction. It helps to remove social distance and communication breakdown among members of the same community. This shows that language is a social instrument; it is a vehicle by which unity (or difference and conflict) is promoted in society. For any society to progress and record outstanding success in the area of development, language must not be neglected. This is because a society always comprises different groups of people who will probably exercise their use of language in different forms, based on such elements like their background, education, social class, profession, gender, religion, etc. In effect, communication through language greatly affects the general conduct of people within a particular society.

Apart from being a very important vehicle in any social group, language is also a major instrument in the recording of facts and the storing of information for future use. Also,

it is a potent factor in the control of reality and a viable tool which can be used to establish and maintain social identity. Language can be used to pacify and also to instigate. Thus, it could be said that language has a magical power to influence, persuade, control, and to direct.

In essence, language can be organized in such a way that it will generate war or foster peace within any social setup. It is against this background that this work seeks to look at the use of language among the various human rights activists in Nigeria.

From the foregoing, it must be pointed out that as interesting as the phenomenon of language is, it is also very delicate and sensitive in its approaches, uses and applications. This is because the structure of any communicative act is paramount to the communicative reaction (feedback) that is generated by the addressee. In a situation whereby language is structured towards dispute, complaints, challenges or insults, if proper care is not taken, there could be a counter reaction which will in turn generate strife, ill feelings, violence etc.

Since society and language are inseparable, there is also no way in which culture can be separated from language and the society. This is because culture is entrenched in society, and language is the means by which the culture is affirmed and transmitted within any society. It is important to know that some cultures have elaborate language than others. Thus, there are some words and expressions which may be relevant and tolerated in some cultures, while such may be frowned at in other cultures. Within the African culture, one who has a good command of the language, and respect for culture and elders is said to be synonymous with being a ‘cultured’ person and vice versa.

Definitions of Human Rights

There is an impressive body of jurisprudence, both national and international, on the complex, intriguing, fluid and controversial subject of human rights.⁶ The idea of human rights is not a modern phenomenon since it revolves around the universal humanity, which people enjoy and share with one another. In contemporary times, human rights also mean the expression of the rights of people. These rights have been variously defined, explained and justified from one historical epoch to another with shifts and modifications here and there.

What we call human rights today stemmed from natural laws and natural right theories, which origins have generated controversies in philosophy, law and other related disciplines of intellectual endeavour. Many of the prevailing conceptions of human rights are traceable to the ideas of natural law which were developed by ancient Greek philosophers, the Stoics,

Roman lawyers, Christian fathers such as Thomas Aquinas, and the social contract theorists of the seventeenth and eighteenth centuries like John Locke and Rousseau.⁷

Human right may be defined as those rights which all human beings enjoy by virtue of their humanity, the deprivation of which would constitute a grave affront to people's natural sense of justice. Human right can be explained in terms of the development of consciousness in human's struggle to live in harmony with one another. According to Osita Eze, "human rights represent demands or claims which individuals or groups make on society, some of which are protected by law and have become part of *lex lata*, while others remain aspirations to be attained in the future."⁸ In a similar vein, U.O. Umozurike conceives of human rights as "claims, which are invariably supported by ethics and which should be supported by law, made on society... by individuals or groups on the basis of their humanity."⁹ It follows from these descriptive conceptions of human rights that the concept, 'human rights', is omnibus, incorporating many laws of claims, liberties, power, expectations and advantages which the individual seeks to enjoy from society by virtue of being human. While some of these rights have been accorded recognition by the legal system, others are still ideals that are yet to be legalized.

In an attempt to define human rights, A. O. Obaseki posits that:

Human rights have been variously described as the rights of man or fundamental freedoms. They are claimed and asserted as those which should be or sometimes stated to be those which are legally recognized and protected to secure for each individual the fullest and freest development of personality and spiritual, moral and other independence. They are, conceived as rights inherent in individuals as rational free willing creatures, not conferred by some positive law or abrogated by positive law.¹⁰

The thrust of the above is that human rights are intrinsic to human existence. These rights are immutable and not capable of being abrogated or abridged by positive law. They are not claims to law, brotherhood, parochial interests or charity. Rather, they are fundamental rights of human beings which are inherent and cannot be derogated.

These rights are fundamental because they are making up a person's being. They are universal because they are applicable to people of all races and tribes, without discriminations. Human rights, when recognized and respected, enable an individual to fully develop and use all human qualities, intelligence, talents and conscience to satisfy both spiritual and material needs. They protect the dignity of man as man.

There are several ways of classifying human rights. They are generally grouped under five sub-headings: civil, political, social, economic and cultural rights. This grouping should not be taken as rigid since they are closely interrelated. It must, however, be noted that all these rights have been recognized and enshrined in numerous international conventions.¹¹ The most important of which is the International Bill of Human Rights, proclaimed and adopted at various times by the General Assembly of the United Nations. This consists of the 1948 Universal Declaration of Human Rights; the 1966 International Covenant on Civil and Political Rights, including its Optional Protocol; and the 1966 International Covenant on Economic, Social and Cultural Rights.¹² With the resolutions of all these conventions, human rights are not merely the internal matter of any single nation-state; it is a common cause of concern for all governments and all peoples of the world community.

Human Rights Activism in Nigeria

Having conceptualized the idea of human rights in the preceding section, the questions may perhaps be posed: what is human right activism, and what is the Nigerian experience? Activism in a general sense can be described as an international action to bring about social or political change. This action is in support of, or opposition to, one side of an often controversial argument, political idea or policy. Given this understanding, human rights activism can be described as a liberation process and ideological struggle for the defense of human rights against wanton abuse and violations by individual, group or state. It is an international and purpose-driven cause of strengthening the ideas and tenets of human rights as entrenched in regional charters and international conventions. Human rights activism can be situated on the platform of either a movement or an individual. As an individual in the struggle for human rights, an activist is one who plays a special part, takes vigorous actions and makes public pronouncements on critical human rights issues. Oftentimes, human right activists are called “freedom fighters”, “protesters”, or even “terrorists”.

At the movement level, human rights activism involves the totality of norms, institutions and processes that seek to shield the individual and the citizens at large from

arbitrary and excessive human rights abuses by the state. In any form, human rights activism champions the cause of justice, and respect for and observance of human rights. Through press conferences, press releases, rallies, street marches, confrontational and guerrilla tactics, education and public awareness, etc., human rights activists and movements expose cases of gross human rights abuses and clamour for the restoration of rights and the future avoidance of such abuses.

The Nigeria experience of human rights activism is not much different from the above. Before the emergence of human rights movements in Nigeria, human rights activism seemed the exclusive preserve of individuals in their various fields of endeavour. Some of these included the late Tai Solarin, Professor Ayodele Awojobi, Dr. Edwin Madunagu and others who were considered radicals or extremists. These individuals championed the human rights of the citizenry. It was, however, in the legal profession that individual activists made the most impact, employing the instrument of law in pursuit of human rights. Foremost in the vanguard of these activists are the likes of Chief Gani Fawehinmi, Alao Aka-Bashorun, Abiodun Aremu, Dipo Fashina, Femi Falana, Bamidele Aturu, Festus Keyamo, Tunde Bakare, etc, all of whom were known as radical human rights activists.

Human rights activism is better done in the form of concerted efforts through institutional movements. Human rights groups or movements in Nigeria are beginning to come of age. Blazing the trail of organized human rights activism in Nigeria was the duo of Olisa Agbakoba and Clement Nwankwo who established the Civil Liberties Organization (CLO) in 1987.¹² The success made by these pioneers has led to the explosion of human right groups in the country, all geared towards the promotion, protection and enforcement of fundamental human rights. Other notable groups include the Constitutional Rights Project (CRP), Human Rights Law Services, Huri-Laws, Baobab for Women's Rights, Centre for Law Enforcement Education (CLEEN), Socio-Economic Rights Initiatives (SERI), Legal Defence Centre (LDC), Save Nigeria Group (SNG) etc.

The Language of Human Rights Activists in Nigeria

Human rights activism (whether at the individual level or as a movement) employs the communicative, ideational, emotive and social functions of language in achieving systematically the goals and visions of human right activism. In this section, we shall take a look at some selected excerpts of some human rights activists in Nigeria. Below is a cross section of the style of their language while pursuing the cause of human rights.

1. “If the Obasanjo administration fails to broaden the democratic space... we have no choice but to embark on mass political struggle”.
A Press Statement issued by the Democratic Alternative (DA) April 16, 2002.
2. “We call on all workers... to join forces... to remove the collaborating exploiters... and their agents from power; to lift this crushing burden imposed by this heartless administration on our collective human existence...”
Bamidele Aturu, Media Chat on State of the Nation on AIT, November 17, 2005.
3. “That ram who calls himself Lam...”
Chief Gani Fawehinmi, in an exclusive interview with DBN, December 12, 2003.
4. “General Olusegun Obasanjo is a stubborn brute who is totally opposed to section 14(2)b of the Constitution of the Federal Republic of Nigeria.”
CRP Press statement on fuel increase, Sunday August 18, 2005.
5. “General Obasanjo has been viciously, fraudulently and illegally manipulating the democratic process”.
Bamidele Aturu in Daily Independent, October 20, 2001.
6. “Obasanjo is the father of godfathers”.
Chief Fawehinmi, Weekly Spectator, January 22, 2006.
7. “Obasanjo’s fraudulent and diabolical manipulation of the electoral process.”
Ayo Obe, New Age, March 25, 2005.
8. “The dastardly dictatorial and anti-people Obasanjo’s regime definitely has a date with destiny”.
Festus Kiyamo, The Sun, September 9, 2005.
9. “General Obasanjo can only be removed by all revolutionary means, including mass action or mass revolt”.
Femi Falana, A Press Release, February 8, 2006
10. “Obasanjo usurps the powers that are not given to him by the constitution”.
A Press Release by Civil Liberties Organization (CLO), June 2002.
11. “Obasanjo would not like anyone to come and overshadow his maradonic attitude”.
Femi Aborisade, Media interview on Political Terrain, Galaxy Television, January 17, 2006.
12. “Any third term bid by you is... a suicide mission driven by perverted ambition.”
Chima Ubani, The Punch, April 6, 2005.

13. “Something must be done to this government... The only feasible action is to sack Obasanjo’s government by mass protests.”
Alao Aka Bashorun, The Guardian, May 14, 2002.
14. “Aduwo is an imbecile; I don’t know how he got promoted, his memory is very poor”.
Chief Gani Fawehinmi, Weekly Spectator, January 22, 2006.
15. “... so this church rat is comparing himself to an elephant”
(Ibid).
16. “If Obasanjo insists on third term; on denying the rights of Nigerians to personal development... the gods and the spirits of the Nigerian ancestors shall resist him, and put him to shameful regret.”
Olapade Agoro, National Mirror, September 16, 2005.
17. “Ah! That one, he is not the governor. He is just a dummy-figure head”.
Femi Falana, Media Chat on MITV, February 7, 2006.

All the above excerpts point to one fact – the harsh, aggressive, violent, and abusive style of language employed by human rights activists in the process of activism. In excerpt 1, we have the use of expressions like: “Mass political struggle...” “Struggle” here connotes violence.

Excerpt 9 mentions “Mass action and mass revolt”. “Mass action” here is more convenient than mass revolt since a revolt connotes the act by which some people refuse to be controlled or ruled. This may eventually lead to anarchy.

Excerpt 4 is an indication of the violation of the social and economic rights of Nigerians by the President. While expressing this, the language employed was directed at the personality of the president, calling him “a stubborn brute”. The expression in excerpt 3 – “that ‘ram’ who calls himself ‘Lam’...” was directed to a one-time governor of Oyo State by the name Lam Adesina. “Lam” is the short form of “Lamidi”. The activist here deliberately plays upon words using the names “Lam” and “ram”. Here, he likened Lam (Lamidi) to a ram. Granted that the two names sound alike, what the activist is comparing are the features of animal to that of man. Instead of addressing the issue that has to do with how the man had probably perpetuated social injustice against the people of Oyo State, the personality of the subject was given prominence through a violent attack. Ram is the male form of a sheep known for its irrational nature. Thus, to compare a human being, especially one who was holding the political office of a governor, to an animal is denigrating.

In the same vein, a reflective look at excerpt 14 – “Aduwo is an imbecile... his memory is very poor” further illustrates the violence in the language of human rights activists in Nigeria. An activist should not resort to foul language as a tool to get a message across to his or her targets. The expression is more of a metaphor. The addressee, a former Chief of Navel Staff, is referred to as being foolish because he had behaved in an unexpected way, which violated human rights. Also, the reference to “his memory” is a further attack on his personality. This connotes that he is gullible. Thus, the activist posits in the sentence that follows that: “I don’t know how he got promoted”.

Excerpt 6 focuses on the notion of political god-fatherism, a prevalent unwholesome practice in the Nigerian political terrain. Winning an election in Nigeria is often associated with the strong support of influential people enjoyed by political aspirants. These influential supporters are known within the Nigerian political terrain as god-fathers. Usually, god-fathers are Machiavellian characters who play politics in a dirty and do-or-die manner. But the excerpts above related the concept of god-fatherism to the president and also accused him of being a major player of this socio-political evil. Though fundamental human rights recognize the place of freedom of speech, but with any freedom, there is bound to be some limitations which give preference to the human personality of the other individual.

Excerpt 6 above is not much different from excerpt 12. The latter is a direct attack on the personality of the addressee who happens to be the president. Though the activist decried the third term bid of the president, such salient point could still be made without an attack on his personality. In a similar vein, the speaker in excerpt 16 reacted to the ‘third-term’ bid of the former president of the Federal Republic of Nigeria, Rtd. General Olusegun Obasanjo. In his opinion, Rtd. General Olusegun Obasanjo should not under any condition dream of going for a third term. While the activist enjoys the freedom of speech, going further to invoke the spirit of the gods and the ancestors against the former president is uncalled for.

In excerpt 15, the speaker referred to a governor who celebrated his 100 days in office. Linguistically, the church rat connotes a malnourished, poor and insignificant animal that lives in place where the only objects around are alters, offering trays, chairs, etc. The speaker should have criticized the self-acclaimed performance of the governor, instead of attacking the governor by comparing him to a church rat.

Excerpt 17 explains the pervasiveness of corruption in Nigeria. The speaker referred to the system of government where a supposedly dummy-guided elected personality assumes a political position and he is expected to dance to the tune of the political powers that

enthroned him. Such is the case of the person whom the excerpt was directed at. But to call a governor “a dummy”, is denigrating and violent.

When such violent words and expressions as “sack”, “diabolical”, “fraudulently”, “maradonic attitude”, “dummy”, “imbecile”, etc. are used in the cause of human rights activism, they have negative connotations and could affect the psychological mien of the object of attack. This style of language of human rights activists is incapable of achieving the crucial goals and visions of human right activism in Nigeria because the criticism becomes bereft of positive construction.

Towards a Viable Language of Human Rights Activism in Nigeria

Following the discussions above, we observe the violent language that characterized the communications of many Nigerian activists. While this paper shares in the ideological stance of human rights activists in Nigeria, it condemns the forceful, violent, and degrading language they adopt in their activism. Dialogue is still the best method of resolving issues. For instance, pressures can be mounted on the government till they agree to a stakeholder, roundtable conference where a consensus can be reached on the protection and enforcement of citizens’ rights. Mutual understanding can only be attained through the use of humane linguistic items in the language of human rights activism. In the case of insincerity on the part of government especially when they renege on agreements, human rights activists can employ the use of credible press agencies to present their views to the public; enlightenment campaigns can also be launched to educate the masses on issues at stake and the need to go on with the struggle in a non-violent manner. Moreover, different opinion groups may be used; the media can also be harnessed. In all these, attack on human personality should be avoided.

In well established societies, such government functionaries who renege on their promises may be invited by the masses through the aid of the press agencies to give explanations to the people and answer questions posed to them. But in a situation whereby a government functionary has read a nasty and anger-provoking article or statement which denigrates him outright, he will be reluctant to grant any media interview, or appear on a platform where issues relating to the protection and enforcement of peoples’ rights will be discussed.

Thus, language that is not filled with violence, strife, anger, etc., will achieve more credible results than when violent language is used in human rights activism. In the processes of liberation, there is need for activists to use constructive criticisms in their statements. Mass

protest and social media are other potent tools that can be constructively employed to express dissatisfaction against inhumane policies, acts and utterances of government. Mass protest is usually resorted to when all attempts at dialogue have failed. The masses can then embark on a peaceful protest in the forms of rallies, endurance treks with placards, etc. During these protests, the language and the message must be simple and direct. Foul language, abusive words, etc., are not necessary as these will do harm to the good intention(s) that motivated the actions.

It is pertinent therefore to reiterate that language plays a vital role in the life of people. Hence, it has to be managed in such a way that the social network would not be broken. Many human rights activists in Nigeria do not adhere to the rules of address; it is very important for them to uphold rules in its various forms. Nigeria's speech community has preference for the rules of address, which is attainable only through non-violent language. Hence, human rights activists should not alienate themselves from the linguistic tradition of the people, which recognizes good measure of respect in speech. Such expressions as "Obasanjo", "ram" for "Lam", "imbecile", "heartless", etc. do not show respect for the office such persons hold at the particular time. More dignified expressions like "Mr. President", "Mr. Governor", and "the Head of State" should replace the ones cited earlier.

Conclusion

In this paper, we have analyzed the language problem of human rights activism in Nigeria. We have identified that the concept and practice of human rights activism are not peculiar to the Nigerian society. They are universal. However, it should be equally noted that the concept and practice of non-violent social and political activism are not alien in history. Such were the crusades of Martin Luther King (Jr.) of United States of America, and Mahatma Gandhi of India, who preached the brotherhood of man, truth and love in a non-violent way. This approach to activism yielded positive results. Human rights activism in Nigeria should be made to reflect this linguistic ideal. This is exigent if the goals and visions of human rights activism are to be fully realized in the country.

Respect for human rights in Nigeria can only be fostered by the observance of the spirit and letter of the fundamental human rights enshrined in the various charters on human rights. However, in the quest for achieving human rights, activism has a great role to play. It is only through successful activism that the human rights of Nigerians can be protected and

enforced. Through effective, virile and veritable activism, the bedrock of good governance and democracy can be laid. However, one major key to successful activism is the use of humane style of language. Such language must have an adequate measure of respect, integrity and modesty, all reflective of the African culture.

Successful activism cannot be achieved in isolation of the language employed. If the non-violent style of language is given prominence among human rights activists, controversial issues arising among them and the stakeholders in the Nigeria state would be more easily addressed through dialogue, understanding and consensus. In conclusion, the onerous task before human rights activists in Nigeria is to evolve, cultivate and nurture a culture of non-violent and humane style of language in order to genuinely promote democracy, good governance, and human interest in the 21st century Nigeria.

End Notes:

- ¹Ayo Obe, “Tasks Facing Human Rights NGOS.” A paper presented at the Constitutional Rights Project Seminar on Human Rights, Journalism and Nation Building, Lagos (June 10,1999, p.1.
- ² M.A.K Halliday, “Language, Structure and Language Function.” In *New Horizons in Linguistics*. Edited by J. Lyons. Harmondsworth: Penguin Books, 1971, p.33.
- ³ *Ibid.*, p. 28.
- ⁴ G.L. Brook, *Varieties of English* (2nd Ed). Hong Kong: Macmillan Press, 1982, p.12.
- ⁵ D.C. Crystal, ed. *The Cambridge Encyclopedia of the English Language*, Cambridge: Cambridge University Press, 1995, p. 10.
- ⁶ O. C. Eze, “Dissent in a Democratic Polity.” In *Democracy and the Law*. Edited by Y. Osibanjo and K. Awa. Lagos: Federal Ministry of Justice, 2001, p. 3.
- ⁷ F.C. Enemuo, “Democracy, Human Rights and the Rule of Law”. In *Elements of Politics*. Edited by R. A. Francis. Ikeja: Malthouse Press Limited, 1999, p. 147.
- ⁸ O. C. Eze, *Op.cit.*, p. 15.
- ⁹ U. O. Umzurike, “Human Rights and Democracy in the 21st Century: The African Challenges.” In *Law, Human Rights and the Administration of Justice in Nigeria*. Edited by M.T. Ladan. Zaria: Ahmadu Bello University Press, 2001, p. 38.
- ¹⁰A.O. Obaseki, “The Judiciary and Human Rights.” In *Perspectives on Human Rights*. Edited by Y. Osinbajo and K. Awa. Lagos: Federal Ministry of Justice, 2002, pp. 246-247.

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13. B. Ugochukwu (ed.) *Update on Human Rights Litigation in Nigeria*. Lagos: Legal Defence Centre, 2005, p. 9.

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