

## AN ANALYSIS OF THE CONTRADICTIONARY JUDICIAL RULINGS IN THE POST-2015 GUBERNATORIAL ELECTION TRIBUNAL CASES IN NIGERIA: IMPLICATION FOR NIGERIA'S DEMOCRACY

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### **Abstract**

The Nigerian judiciary is currently faced with a critical and historical role of killing or saving her democracy through its rulings on petitions arising from the post-2015 gubernatorial elections. This paper focuses on the contradictory post-2015 State Election Tribunal rulings in Nigeria and its implications for Nigeria's Democracy. Our objective is to examine some of the rulings in order to expose the contradictions therein so as to give vent to our claims of existing inequity, miscarriage of justice, as well as its implications for Nigeria's democratic development. The Systems and Structural Functionalism theories complementarily and respectively provide anchor for the study. Our source of data is secondary but mainly e-generated while analysis is qualitative, descriptive, legalistic, and comparative. The paper posits that a situation where same legal principle operating under similar environments were employed to realize different and conflicting judicial outcomes, is, in fact, a miscarriage of justice, inequity, and tantamount to underdevelopment of Nigeria's democracy.

**Keywords:** Democracy, Equity, Justice, Contradiction, underdevelopment, legal principle, judicial recklessness, legitimacy, smart card reader

### **Introduction**

The judiciary has every so often been addressed as the "last hope for the common man". This accolade, if you will, derives from the constitutional responsibility of the judiciary in a democracy.

Perhaps, the establishment of the judiciary as a major institution and arm of government traces to an attempt by modern nation-states to checkmate autocracy or what Arthur M. Schlesinger, Jr. in his 1973 volume referred to as *The Imperial Presidency*. A situation where the law begins and stops at the office of the Head of State and Government could lead to abuse of office and perversion of the democratic process and ethos. Similarly, a situation where the judicial activism leads to the negation of the aims behind its institution portends danger for democracy. This is why in reaction to the appellate decision on Akwa Ibom state election litigation, Onwukwe observed that "the overriding objective of the legal system in the world is to do justice"...but "justice (itself) derives confidence in the judiciary and is the oxygen that sustains the democratic process" (<http://afroprofile.com/?p=87463>).

In Nigeria over the years, there has been a deafening outcry over the seeming abuse and compromise in and of the judicial system. It has reached to a point where the masses have begun to view both the justice system and dispensation of justice with suspicion. There are general allegations of real and imagined monetary inducements to judges by litigants on the basis of which there has been outcries of miscarriage of justice – where favorable outcome of cases have degenerated to “cash and carry”. The outcome of post-election tribunal litigations in Nigeria has not been spared of this phenomenon.

Today, while Nigeria calls herself a democracy, her citizens continue to experience acts reminiscent of abuse of functional roles from its three arms of the government both at the center (federal) as well as the periphery (state) levels. It is here that the will of the electorate usually are made subservient to that of the political class who influence electoral outcomes by compromising the judicial system to a point where outcome of elections in Nigeria has been derisively branded “selection” (Ekemam, 2012).

While these phenomena subsist, its new sub-current which we dare brand judicial irresponsibility has been on the rise since the emergence of Gen. Muhammadu Buhari as President following the 2015 presidential election on the platform of All Progressives Congress, APC – an amalgamation of several formally opposition political parties.

Buhari won the presidency on his fourth attempt after having suffered three previous electoral misfortunes. His emergence raised much hope for Nigeria’s democracy and was, therefore, expected to usher in the highest level of transparency – a major ingredient of democracy – especially in the judicial system. This is because Buhari had been widely sold during the campaign as a no-nonsense disciplinarian; a man of integrity, who had zero tolerance for illegality. It was this same Buhari who became famous for his institution of a program known as “*War Against Indiscipline*” which characterized his first stint with governance through a military coup d’e-tat in the mid 1980s. It was therefore expected that his election as president would bring with it a judicial system whose integrity would be unquestionable; a judiciary whose rulings would be in tandem with that image of Buhari sold to the Nigerian electorate prior to the presidential election of 2015.

Unfortunately, however, some of the tribunal rulings in the post-2015 general election litigations have been characterized with contradiction, hence posing great danger to Nigeria’s democratic development. Since the election, different tribunals have overturned the election of several governors including, Abia, Rivers, Akwa Ibom, and Taraba, and in few cases sustained elections on contradictory premise.

### **Objective of Study**

This study attempts to examine as well as analyze the legal contradiction in the judicial rulings of post-2015 general election in Nigeria with the aim of highlighting its implication for Nigeria’s democratic process and development. It is also an attempt to examine the connection existing between the principle of social justice, equity, and democracy and to suggest that absence of these principles in practice is an underdevelopment of democracy. The paper is anchored on one major assumption: that for law to be just, it must be applied equitably amongst the entities and/or individuals for whom such laws were instituted or enacted.

By equity here, we mean that the verdicts emanating from the same judicial or justice system, when in consideration of like legal premises, entities, stimuli, or persons governed by the same democratic constitutional provision, must be based on same legal principle of justice and equity. In other words “*if all things are equal*” a just and equitable legal balance ought to be struck in the dispensation of justice. Therefore, a contrary conception of this idea constitutes a snag in the development of democracy. This position is compatible with that of Justice Mohammed who in addressing the Annual Conference of the Appeal Court in Abuja recently, opined in reference to the conflicting, confounding, and disingenuous verdicts emanating from election tribunals across the country, that: “as the guardian of law, we must not only be just, we must also convey certainty in our justness” (<http://afroprofile.com/?p=87463>).

### **Theoretical and Conceptual Framework**

To properly analyze this phenomenon, we have considered and adopted two complementary theoretical frameworks which we hope would place the work in its proper trajectory. To wit: *The System theory* as espoused by Professor David Easton (1965) and the *Structural Functionalism theory* as employed by Talcott Parsons (1951), Robert Merton (1957), and Herbert Spencer (1896).

Systems Theory sprung out as a proposal by a biologist, Ludwig von Bertalanffy in the 1940s. It was seen as the complex entity of the biological system (Roskin 2000), in which living entities are highly integrated to perform inter-dependent roles in a given system to sustain its life . David Easton in 1953 adopted the same theory to explain what happens in a political system but later elaborated his conception in 1965 in his two works: *A Framework for Political Analysis* and *A System Analysis of Political Life*. Understanding the systems theory as outlined by David Easton may demand the following steps:

1. Changes in the social or physical environment surrounding a political system produces “demands” and supports for action or the status quo directed as “inputs” towards the political system through political behavior
2. These demands and supporting groups stimulate competition in the political system, leading to decisions or “outputs” directed at some aspect of the surrounding social or physical environment.
3. After a decision or output is made (e.g., a specific policy), it interacts with its environment and if it produces change in the environment, there are “outcomes”.
4. When a new policy interacts with its environment, “outcomes” may generate new demands or supports and groups in support or against the policy (“feedback”) or a new policy on some related matter.
5. Feedback leads back to step 1, forming a never-ending cycle.

Accordingly, if the system functions as described, then we have a “stable political system”. If the system breaks down, then we have a dysfunctional political system”. ([https://en.m.wikipedia.org/wiki/System\\_theory\\_in\\_political\\_science](https://en.m.wikipedia.org/wiki/System_theory_in_political_science)) This theory is appropriate

for this study when we consider that the judiciary is a mechanism for the advancement of democracy. Through its defined role of ensuring political equality and legal equity through its interpretation of the law, the judiciary can help in the legitimization of democracy amongst the citizenry of a given political entity.

This study also adopts the *Structural Functionalist* theory which was initiated by scientists to explain the workings of an organism like the human biological system in which every organ has a particular function it performs to sustain the organism.

In social sciences, Structuralists like Talcott Parsons, and Robert Merton see the political system as an entity with different structures interdependently performing different and specific functional roles in order to realize certain goals for which such systems are set up. In other words, the utility and/or worth of any structure/institution, is a measure of its ability to realize those ends for which it was designed. For Herbert Spencer (cited in Macionis 2010:14), institutions are interlinked in society and those employing a structural functionalist approach should take into consideration the network of relationships that exist between these institutions.” Simply stated, structural functionalism “is a framework for building theory that sees society as a complex system whose parts work together to promote solidarity and stability. This theory looks at society through a macro-level orientation, which is broad focus on the social structures that shape society as a whole, and believes that society has evolved like organisms. It looks at both social structure and social functions and addresses society as a whole in terms of the function of its constituent elements... A common analogy popularized by Spencer presents these parts of society as “organs” that work toward the proper functioning of the “body” as a whole ([https://en.m.wikipedia.org/wiki/Structural\\_functionalism](https://en.m.wikipedia.org/wiki/Structural_functionalism));

Structural functional approach is compatible with the trajectory of this study in the sense that the judiciary is a structural part of Nigeria’s political system, the establishment of which is aimed at complementing other structures of the government like the legislature and the executive. Its role or function is the dispensation of “*justice*” which is a major tenet of democracy. Thus if the judiciary fails in this constitutional as well as democratic responsibility, the outcome or consequence tantamount to underdevelopment (in this case), of Nigeria’s democracy.

Put differently, since this approach or theory looks at the system’s structures as well as its functions, the judiciary in our case represents such component or structural requisite of the Nigeria’s democratic political system whose function is needful for the effective operation of her nascent democracy. This is why Parson opined that: “Some roles are bound up in institutions and social structures, for example, economic, legal, political, and educational, etc. These are functional in the sense that they assist society in operating and fulfilling its needs so that it runs smoothly.” (<https://en.m.wikipedia.org/v>)

The structural functional approach as a macro-sociological analysis with broad focus on social structures that shape society as a whole and to that extent is more appropriate for the analysis that follows ([www.http://en.m.wikipedia.org/wiki/struct...](http://en.m.wikipedia.org/wiki/struct...)).

### **The Concept of Justice-Equity-Democracy Nexus**

Deriving from a Greek word, *demo-kratia* meaning ‘people rule’, the term democracy may seem rather uncomplicated. This stems from its wide-spread usage or popularity among scholars in our academy as well as practitioners of politics and lay public alike.

However, as much as the true meaning of democracy may have been a subject of contention stemming sometimes from its ideological reductionism that characterized the Cold War years between the United States and the Soviet Union, there still exists some common denominators upon which a common ground over its meaning has been built. But within that scope are rule of law, equity, and justice, popular consultation, free speech, political equality, popular accountability, political competition, among others. Our interest in this study (to be revisited) is on how the rule of law and/or justice and equity relate to democracy.

Be that as it may, democracy can be defined as a “system of political organization in which certain rights and liberties exist” (Greenberg, 1989:22). It is a form of political organization where the masses participate in the affairs that affect their lives without inhibition (Ekemam, 2012:50). No wonder a great American statesman, Abraham Lincoln, referred to it as the “government of the people, of the people, and for the people.” For Lipset (2004), it is a political system which in some varied ways supplies regular constitutional opportunities for changing the governing officials. It is in this forgoing area that the role of the Judiciary is central at times of legal contentions.

Democracy is a social mechanism which permits the largest possible part of the population to influence major decisions by choosing among contenders for public office in a given society. Such rights must not be seen to be abused by the judiciary if democratic dispensation must be sustained in any given society which has chosen such form of government. But democracy relates to equity and justice, leading Oseghale (2015), in reaction to contradictory judicial opinions of the post-2015 election in Nigeria to note that “... equity, justice, and fairness are ground norm upon which democracy is established” ([Pointblanknews.com/pbn/article-opinion/spice-democracy-equity](http://Pointblanknews.com/pbn/article-opinion/spice-democracy-equity)).

Equity means quality of being fair and impartial – equity of treatment. Its synonyms are fairness, evenhandedness, justice, fair play. Fairness means impartiality towards all concerned, based on principle (in our case, democratic principle) and evenhanded dealing. If justice must be dispensed with equity, it must be dispensed with or *come with clean hands*.

In the following passages we have presented, juxtaposed, and analyzed three major cases to give vent to our suggestion of contradictory judicial rulings, viz: (1) the judicial ruling in the Lagos

State election tribunal between the petitioner, Jimi Agbaje of the PDP and the declared winner, Akinwunmi Ambode of the APC. (2) The judicial ruling which invalidated the Akwa Ibom assembly election and ordering of a rerun, and (3) the Rivers State ruling which sacked Governor Nyesom Wike of PDP who was formerly declared winner by the Independent National Electoral Commission.

### **The Lagos State Ruling**

The Lagos State Governorship Election Petition Tribunal sitting struck out the petition filed by Jimi Agbaje of the Peoples Democratic Party, PDP against Governor Akinwunmi Ambode of Lagos state who ran on the platform of APC. In this case, a 3-man tribunal, chaired by Justice Muhammad Sirajo upheld the submission of Mr. Ambode and APC by declaring that the petition was incompetent.

The thrust of the judgment was principally hinged on the “improper or non-use of the smart card reader” upon which the petitioner, PDP and Agbaje collectively hinged its case. In this case, the Court of Appeal, on August 26, 2015, in upholding the Lagos State Election Petition’s verdict held that a petitioner cannot project the non-presence or improper use of the smart card reader as a ground for questioning an election outcome,

[\(https://flashpointnews.wordpress.com/2015/10/25/card-reader-has-no-life-of-its-own/\)](https://flashpointnews.wordpress.com/2015/10/25/card-reader-has-no-life-of-its-own/).

This position above was given vent, it would seem, because of the options offered by the National Independent Electoral Commission, INEC, through statements made in several television appearances by its chairman, Prof. Atahiru Jega, that “in the event the card reader malfunction, in order not to disenfranchise eligible voters, election officials were mandated to proceed with manual accreditation of voters, (Amadi, B. <https://www.today.ng/opinion/30615/card-reader-magic-against-wike>). It demands our consciousness here, however, that such pronouncements were not given the effect of law as did the National Electoral Act, but rather a provision of convenience that was simply a child of necessity when in the early hours of the voting activities, the card readers began to malfunction at many polling stations across the country, particularly in the south.

The Lagos tribunal and appellate rulings in Agbaje and Ambode has therefore become an issue of interest to this paper especially because since the Appellate Court is a higher competent court of jurisdiction save the Supreme Court (if a litigant chooses to step up his/her need for judgment), this ruling has created a legal ground-norm upon which rulings on similar cases would be based. And that is, simply put; that card reader is not recognized by the Electoral Act, neither is the Electoral Act the progenitor of the smart card reader.

It is important to note here that the Court of Appeal did not speak of the card reader here as an obiter (that is a by-the-way remark). Instead, it was seen as a ratio; a core reasoning in its decision on the appeal before it (Amadi, B. 2015). Hence, hinging any further petition on same (card reader) runs the risk of inadmissibility or preemption of relief any petitioner may seek, since in the opinion of the Court of Appeal, the card reader did not have any legal authority but

was a nascent and novel attempt by the Independent National Electoral Commission to conduct a fair and less cumbersome election.

### **The Akwa-Ibom State Ruling**

The Akwa Ibom governorship election was held on April 11, 2015 in which Decon Udom Emmanuel of the PDP overwhelmingly won but the Akwa Ibom State Election Petition Tribunal on October 21, 2015 overturned the result and ordered a rerun in 18 council areas. In this case, the panel of judges arrived at their verdict by relying heavily on the card reader. On December 18, 2015, this ruling was sustained by the Appeals Court sitting in Abuja. This runs contrary to reasons proffered by the judges in relation to the legality or otherwise of the consideration of the card reader as bases for election outcome in the Agbaje-Ambode case in Lagos which decision precedes that of Akwa Ibom.

There are many reasons to worry about the inherent contradiction in the Akwa-Ibom verdict of the Court of Appeal, to with the fact that the same Appeals Court, using the same premise and evidence (card reader) in the governorship poll, had upheld the election of the majority of the members of the Akwa Ibom House of Assembly (held the same day by the same accredited voters) and concluded that the elections were free and fairly and those members duly elected. The questions begging for answers are many, some of which are:

1. What is the legal logic upon which the House members are accepted to have been duly elected while the governor was not?
2. Were the elections held different days? and
3. If they were held different days, were the electorate who elected the governor not eligible voters?

### **The Rivers State Ruling**

In the Rivers State governorship election matter, the Court of Appeal on Dec. 16, 2015 had affirmed the judgment of the Rivers State Election Tribunal which on October 24, 2015 gave judgment in favor of the petitioner, Mr. Dakuku Peterside of APC against Nyesom Wike of PDP. The Court had reasoned that Nyesom Wike, the governorship candidate of the Peoples Democratic Party was not validly elected. The Appeals Court, by so doing towed the line of Rivers State Election Petition Tribunal which had earlier nullified Wike's election as the governor of Rivers State.

Again, much as the study acknowledges other varying issues that might have been implicated in the respective states' tribunal cases, the issue of the smart card reader was central in the ruling at the Rivers State Tribunal as well as in the rulings at the respective states' cases under review.

In the case of Rivers State, and on the grounds that the card readers were not used or failed in areas that informed the cancellation of their respective results, the tribunal had argued that INEC had the power to insist on the use of the smart card readers as well as on doing so appropriately. This reasoning was premised on the ground, according to the tribunal, that "no conflict existed between the introduction of the card reader and the Electoral Act (Premium Times January 28,



2016) – a consideration that run afoul and contrary to the ruling that sustained the election of Governor Ambode Akinkunmi of Lagos State. In the latter, “the Court held that the Electoral Act (2010) as amended does not recognize the malfunctioning of a card reader as one of the factors that can lead to the nullification of an election.”

### **Discussion**

This paper is anchored on the notion that the judiciary as an arm of the government of Nigeria is instituted to facilitate its democratic governance. This notion is based on the fact that democracy would demand a decentralization of power, vertically and/or horizontally to guide against imperial presidency or autocracy. Thus, when the judiciary fails in this role of ensuring judicial equity and justice, it has, to that extent negated the principle of democracy as well as making mockery of same.

Be that as it may, the issue of the card reader which featured prominently in the tribunals should come under serious scrutiny if we must make a case for contradictory judicial rulings of the post-2015 gubernatorial election in Nigeria. The appellate court in the *Agbaje V, Ambode* held that the card reader is a product of guidelines, not (Electoral) law, hence could not be the premise upon which elections are won or lost. The court thus held that the Electoral Act was superior to electoral guidelines and dispensed the judgment in favor of the Governor-elect, Ambode whose election was contested by Mr Agbaje of the PDP. In this (Lagos state) case the Supreme Court discounted the issue of the card reader whether used properly or not in the execution of the election. Hence, the Lagos case had, by that ruling, inadvertently but legally sealed the fate of those who might have anchored their petition for judgment or relief on the card reader.

Similarly, it was expected that the judges of the appellate courts would have falling in line with such ruling of the Supreme Court particularly if the issue of card reader was central to determining the trajectory of legal opinion, and to that extent maintaining consistency. But that was not the case as our study revealed.

As it relates to Akwa Ibom case, it should be noted, first, that “the same Supreme Court reasoning was applied in deciding the elections in Delta, Kebbi, Oyo, Ogun, and Zamfara states. Be that as it may, the contradiction accompanying the judicial rulings came to fore when the court invalidated a governorship election on grounds of card reader in the Akwa Ibom case while declaring null and void the majority of the Assembly men elected same day, same time, in those invalidated local governments. The question further raised is: why would there be two disparaging judgments based on the same premise from the same court. This question is all the more germane when one considers the fact that the Supreme Court ruling in the case of Lagos preceded that of Akwa Ibom, suggesting that the panelist in Akwa Ibom should have been properly guided by the verdict of the Supreme Court – a court of final resort

This same argument is true for the outcome of the Rivers governorship election which preceded the (Supreme Court’s 28 January 2016 overturn of the Appeal Court’s concurrent decision with



the Rivers State Election Petition Tribunal on the case of *Dakuku Perterside Vs. Governor Nyesom Wike*. According to the Tribunal, “other than the exception made for the presidential election, INEC did not at any time relax the guidelines (on the use of card reader) whatsoever. If the card readers did not work, the Tribunal held, the election in the polling units ought to have been postponed..” (Amadi, B, 2015:1). This was the bases for the “sacking” of Wike and vacating his victory before he proceeded to the Supreme Court.

From these rulings, one does not go too far to conclude that contradiction characterized the judicial pronouncements in the cases cited in this study and to that extent constitute a danger, and if sustained, represents an underdevelopment of Nigeria’s democracy. It was Robert Post of the Yale University Law School who once observed that: “...insofar as violations of the equality required by distributive justice impair democratic legitimacy, democracy requires that these violations be rectified. Similarly, changing conceptions of distributive justice may fundamentally alter the preconditions for democratic legitimacy”, (Post, R. 2006: 24-36).

### **Recommendations**

In view of the of the issues raised in this study which work against the development of Nigeria’s democracy, the following recommendations are deemed necessary:

- (a) The Nigerian judiciary should endeavor to find the fine line between its constitutional functional role in Nigeria’s democracy and the peripheral demands of politics and politicians.
- (b). Nigeria’s constitution should be amended so as to be specific and firm on the independence of the judiciary. This will reduce the overwhelming influence the executive exerts on the judiciary by taking advantage of its (executives) appointive powers as well as the power to determine their salary structure.
- (c). To avoid pecuniary temptations that has become phenomenal given the desperation of candidates seeking political offices, the salary structure of the judiciary should be reviewed upwards to meet, at least, the minimal comfort needs of the judicial workers
- (d). Candidates who suffer electoral misfortune should accept same in the spirit of sportsmanship and desist from unnecessary post-election litigations that often facilitate corruptive practices among judges who by so doing undermine the need for equity and justice.

### **Conclusion**

Close watchers of Nigeria’s democracy will agree that Nigeria’s march to this lofty system of government has witnessed many hiccups since her return to civil rule in 1999. Factors emblematic of these hiccups have varied from ethnicity, religion, poor leadership, corruption in high places to even clanishness. Nigeria’s judiciary, particularly, has not been spared by these debilitating phenomena. The judiciary has witnessed politicization and corruption made possible by a syndrome peculiar to the Nigerian political scene known as “*do-or-die politics*”. The politicians thus compromise the judicial officers who now yield to temptations of wealth acquisition while scarifying the sanctity of the law as would be expected in a democracy. This

phenomenon, we dare say, could inform the same judicial officers giving contradictory legal opinions/rulings in cases that raise identical legal questions under identical circumstances and context.

Similarly, judicial officers in Nigeria are appointees of the executive at both the federal and state levels. In a society of sycophantic and politicized judiciary, judges may choose to align their election petition rulings in favor of governorship candidates whose party had already won the presidency as was the case in Nigeria's general election of 2015 where Muhammadu Buhari had won the presidency under APC before the seating of the Election Petition Tribunals.

Our study reveals a strong evidence of conflict of superiority between "law" and "technology" (represented by the smart card reader). That is, if we consider its centrality in the rulings at both the States' Election Tribunals and the Appeal Courts. The most likely scenario in an ideal democratic setting would have been technology yielding to law as opposed to making the latter subservient to it. This is all the more persuasive given that in these cases, no judge implied that the smart card reader is the progenitor of the Nigerian Electoral Act under which these reviewed cases anchored. And to the extent that the rulings impinged negatively on the democratic process, we can be safe to conclude that Nigeria's democracy is the direct victim of those the contradictory fall out.

### References

- Easton, D. (1965). *A Framework for Political Analysis*. Englewood Cliffs, New Jersey: Prentice Hall, Inc.
- \_\_\_\_\_ (1965). *A System Analysis of Political Life*. New York: NY: John Wiley and Sons, Inc.
- Ekemam, H.I. (2015). *Political Process and Contemporary Political Analysis: Selected Themes and Concepts*. Owerri: Great Star Publishing Company.
- Greenberg, E. (1989). *The American Political System*. Boston: Scott Foresman and Company.
- Lipset, S.M. (2004). *The Democratic Century*. Oklahoma: University of Oklahoma Press
- Merton, Robert (1957). *Social Theory and Social Structure*. London: The Free Press.
- Macionis, G. (2010). *Sociology 7<sup>th</sup> Ed.* Canada: Pearson Ltd.
- Parsons, Talcott (1951). *The Social System*. Glencoe, Illinois: Free Press.
- \_\_\_\_\_ (1937). *The Structure of Social Action*. New York, NY: Free Press.
- Post, Robert (2006). **Democracy and Equality**. in “*The Annals of the American Academy of Political Science*”. Vol. 603, No. 1, pp. 24-36.
- Premium Times (2016). “**Why Tribunal Sacked Wike as Rivers Governor**” Abuja: January 28. See also October 24, 2015 issue.
- Spencer, H. (1898). *Principles of Sociology*. New York, NY: D Appleton and Company, Inc. ([https://en.m.wikipedia.org/wiki/System\\_theory\\_in\\_political\\_science](https://en.m.wikipedia.org/wiki/System_theory_in_political_science). (Retrieved, January 22, 2016).
- Amadi, B. (<https://www.today.ng/opinion/30615/card-reader-magic-against-wike>). (Retrieved December 12, 2015)
- <http://afroprofile.com/?p=87463>).
- (<https://flashpointnews.wordpress.com/2015/10/25/card-reader-has-no-life-of-its-own>) (Retrieved December 29, 2015)
- ([https://en.m.wikipedia.org/wiki/Structural\\_functionalism](https://en.m.wikipedia.org/wiki/Structural_functionalism)) (Retrieved Jan 8, 2016)
- ([Pointblanknews.com/pbn/article-opinion/spice-democracy-equity](http://pointblanknews.com/pbn/article-opinion/spice-democracy-equity))
- <http://www.premiumtimesng.com/news/headlines/192051-why-tribunal-sacked-wike-as-rivers-governor.html>. (Retrieved Jan 15, 2016)
- ([www.http://en.m.wikipedia.org/wiki/struct...](http://en.m.wikipedia.org/wiki/struct...)).
- (<https://en.m.wikipedia.org/v>).
- <http://sunnewsonlile.com/new/rivers-tribunal-sack-wike-order-fresh-polls/>. (Retrieved November 12, 2015).