

---

## Media-Prudence: Some Legal Tips to Public Relations Managers in Multinational Corporate Organizations

Peter N. Nwokolo

### Abstract

In every society, law functions as a means of social control, to regulate the operations of each institution so as to ensure mutual co-existence. In the communication industry, law functions to keep the awesome powers of the media and their operators under check so that communication and information dissemination are done within the confines of the enabling laws. The public relations officer using the print or electronic media should avoid scurrilous and defamatory publications whether in the form of news releases, features, comments, photographs and even cartoons. In all these professional activities, prudence, the duty of care, should be the watch-word. To use the media to poison the pabulum or to sow dragon's teeth and dispense canards are both unprofessional and inimical to the prosperity of a corporate organization. This paper therefore provides some legal warning signals to international public relations managers in multi-national organizations who wish the organizations to achieve the purpose for which they were formed. The public relations managers are therefore advised to shun publications that may embroil their organization in libel suits, contempt of court, invasion of privacy and insider trading. The pieces of legal advice are particularly necessary for Nigerian public relations managers working for either government or private organizations who must work as ambassadors of goodwill to help uplift the battered image of the country. Library materials such books, newspapers and journal articles formed the main sources of information for this work.

### Introduction

Public relations, in all its ramifications, emphasize prudence and duty of care as cardinal principles that guarantee harmonious co-existence between organizations and relevant publics. Henry Campbell Black in his *Black's Law Dictionary* (1983, p. 641) defined prudence as "carefulness, precaution, attentiveness, and good judgment, as applied to action or conduct. That degree of care required by the exigencies or circumstances under which it is to be exercised. This term, in the language of the law, is commonly associated with "care" and "diligence" and contrasted with "negligence." The duty of care is no less applicable in the legal profession as it is in the public relations profession. Emphasizing the centrality of the duty of care in all we do as it affects our neighbours defined as persons who are likely to be affected in one way or the other, Lord Atkin in *Donahue v Stephenson* made the following philosophical observation:

The liability for negligence, whether you style it such or treat it as in other systems as a species of culpa, is no doubt based upon a general public sentiment of moral wrong-doing for which the offender must pay... You must take reasonable care to avoid acts or omissions which you can reasonably foresee would be likely to injure your neighbor. Who then... is my neighbor? The answer seems to be persons who are so closely and directly affected by my act that I ought reasonably to have them in contemplation as being so affected when I am directing my mind to the acts or omissions which are called in question. (Okere, B. 1989-90, p. 34).

The above observation made by the great jurist shows the importance of ethics and morality in our dealings with our neighbour. The society functions on the basis of division of labour. Each of us engages in one activity or the other which is likely to benefit or injure the other depending on whether we apply ethics and morality or jettison both for our own selfish gains.

Highlighting the commonness of ethics in all our actions as professionals, Okunna (2003, p. 5) noted:

Ethics is ubiquitous in the sense that ethical considerations characterize every aspect of human activity. In terms of occupations or field of human endeavour, ethics has become one of the parameters for judging professionalism. This means that for any occupation to be considered a profession, it must have a code of ethics – a body of shared values, standards, rules and regulations for determining acceptable conduct by members of the profession. This is professional ethics.

For purposes of clarification, Odunewu, (2000) explained thus: By professional ethics, we have in mind the study of standards of conduct and moral judgment. Ethics is moral philosophy; it is the system or code of morals of a particular profession.

To Kasoma (1996), the importance of morality which ethics emphasizes is that it keeps the society not only alive but in harmony. It teaches that everyone deserves to be treated fairly, morally or ethically. Infact, the philosophical postulation of Immanuel Kant (cited in Okunna (2003, p. 26) summarizes all we have been trying to say. According to him, the categorical imperative in all our actions should be to: “Act only on that maxim which you can at the same time will to be a universal law.” To him, a good man is one who habitually acts rightly, and a right action is one that is done from a sense of duty.

An international public relations manager should, in writing his advertisements and advertorials, avoid acts that smack of fraud and misinformation to the public. For instance on June 18, 1988, a Boston Globe newspaper columnist earlier nominated for a Pulitzer price was forced to resign after it was discovered that characters and quotes in many of her columns were fabricated. (Friend, Challenger and McAdams, 2000, p. 200). They also reported that in August the same year, another Globe columnist was suspended when it was

found that he plagiarized material from a book written by one comedian, George Carlin. He finally resigned when another suspicious column was later discovered. Such unholy acts not only cripple careers and damage reputations badly, they ruin business organizations. This fact was amplified on June 28, 1998.

According to Friend et al (2000) on that day, the Cincinnati Enquirer was forced to offer a front-page apology to Chiquita Brands International after a reporter investigating the company's business practices was found to have based his research on voice mail stolen from the company. The newspaper disallowed the series, fired the reporter and agreed to pay Chiquita more than \$10 million in damages to avoid a lawsuit. Chiquita also filed a separate suit against the reporter. It must be observed that the journalism profession is one and same and whether one is in advertising or public relations, one is enjoined to observe the ethical and legal do's and don'ts that guide sound and prudent practice. This is the main objective and thrust of the paper.

The difference between ethical and legal transgression is that while a crooked practitioner can hide for some time in his unethical practices, such is not the same with law as the latter is more objective and external. According to Hart (cited in Ibekwe (1991-1993, p. 61) while ethics is self-legislated and self-enforced, law affords the practitioner the advantage of knowing in advance the ways in which his liberty will be restricted in the various situations in which he may find himself. This enables him to plan his life, and such knowledge increases the confidence with which he can predict and plan his future. For example, the principle of law: "nullum crimen, nulla poena sine lege" provides that a person cannot be convicted unless the offence and the punishment are written.

Hence all an international public relations officer posted to another country requires is to take time and study the ethical and the legal rules guiding practice in that country. He must especially bear in mind that ignorance of the law is no excuse.

In Britain, for instance, the law guiding supply of good contains a number of implied terms designed to protect the purchaser. The ethical and legal implications of this law are that a company must be sure of the quality of goods it is offering for sale to the consumer. An international public relations officer must therefore be sure of the quality of goods or services his organization provides before advertising. These implied conditions which he must be conversant with for instance, are as follows:

1. The seller (the company) will pass good title to the buyer and warranties that the goods are free from encumbrance and that the buyer will enjoy quiet possession of the goods.
2. Where there are sale of goods by description, the goods will correspond with the description. Where by sample, the bulk will be up to sample standard.
3. The goods are of merchantable quality if intended for resale, unless bought as seen.
4. The goods are reasonably fit for any purpose made known by the buyer to the seller, unless the buyer does not rely on the skill and judgment of the seller.
5. The buyer will have reasonable opportunity of comparing bulk of goods with sample.

The main difference says Loyd (2005, p. 51) between a condition and a warranty is that on the breach of an implied condition a buyer may cancel the contract, reject the goods and recover damages. For breach of warranty, the buyer will only recover damages but the contract still stand.

In addition, an international public relations officer must also be mindful of such other laws some of which we shall discuss below. These include: agency law, law of contract, trade marks and passing off, copyright, defamation, etc.

He should be mindful of those laws in all his publications about his organizations and must seek the advice of a solicitor before getting involved in any legal problems. He must remember that defamation of a person's trade or business is very easy through competitive advertising employing cartoons, pictures or simply statements in advertorials. The Nigerian case of *Mutual Aid Society Ltd v M.A. Akerele* is instructive as it illustrates what we are saying. The society was found guilty of defaming one Mr. Akerele even though the offending advertisement for sale of his house was a case of mistaken identity perpetrated by an agent, the auctioneer. According to Okonkwo (1990, p. 171) the advertising publics with which an international public relations manager will always be engaged include: the company or the advertisers who may be the manufacturers of the product or the vendors; the advertising agencies who are the intermediaries between the media and the publics; the media owners who provide the conduit for dissemination of the sales messages; the service contractors such as the printers and photographers; and the public who are the consumers of the product of advertising. The international public relations manager must be wary of these groups as he gets involved in selling his company's goods and services.

### **Theoretical framework**

Social responsibility, according to the International Principles of professional ethics in journalism (which public relations managers must also adhere to) in its Principle III provides:

Information in journalism is understood as a social good and not as a commodity, which means that the journalist shares responsibility for the information transmitted and is accountable not only to those controlling the media but ultimately to the public at large, including various social interests. The journalist's social responsibility requires that he or she will act under all circumstances in conformity with a personal ethical consciousness (in Okunna 2003, p. 47).

Originated from the work of the American based Hutchins's Commission, set up in 1947, the social responsibility theory is concerned with free and responsible press. It was set up in reaction to the careless and irresponsible professional conduct found during the libertarian era typified by yellow journalism, character assassination and sensationalism. The main thrust of the theory was to redirect professional journalism. According to Pulitzer (cited in Ojobor (2003, p. 11):

Nothing less than the highest ideals, the most scrupulous anxiety to do right, the most accurate knowledge of the problems it has to meet and a sincere sense of moral responsibility will save

journalism from a subservience to business interests, seeking selfish ends antagonistic to public welfare.

It must be noted that both the law and ethics of international public relations and the journalism profession as a whole have one thing in common, and that is being professionally responsible. For instance, section A of the international public relations code of professional conduct admonishes members to exhibit high personal integrity, high moral standards, and sound reputation. It urges members to always uphold and observe the constitution, rules and particularly the code as adopted by members in a general assembly held in Venice on May, 1961. Members are enjoined to respect the truth at all times, avoid disseminating false and misleading information knowingly or recklessly, and to use proper care to avoid doing so inadvertently. A member, shall, among other do's and don'ts of the code, not maliciously injure the professional reputation of another member. For instance, an international public relations officer should not engage in plagiarism. He should not copy wholesale or in part, other people's work without attribution. Nor should he produce a work, be it in print, broadcast, art work or design without proper acknowledgement. He should abide by all the rules of copyright enunciated in national and international conventions on copyright. He should be conscious of the consequences of published information that one suit can cost more than \$1 million in losses, and \$100,000 just to defend (Friend, Challenger and McAdams 2000, p. 393).

The above prudential word of caution agrees with the Teleological theory of ethics (Tschdim 1992). The theory posits that it is the result or consequences of actions that determine the rightness or wrongness of such actions. Also referred to as the doctrine of consequentialism, teleological theories, says Rossouw (cited in Okunna (2003, p. 21) are:

Consequence oriented theories (and) emphasize that we should look at the possible consequences or practical implications of our intended action in order to determine whether [it] is right or wrong. If the bad consequences outweigh the good ones, the proposed action should be abandoned and it should be regarded as morally wrong. Should the good consequences outweigh the bad ones however; the proposed action can be considered as morally permissible.

This is what Kant meant when he advised that we must at the all times act according to the maxim that what is right for me, must at the same time be that which is right for all others, to whom the same alternatives, under the same circumstances, are presented. (Iheme, 1995, p. 13). Hence, media prudence, in this work refers to the general theoretical and professional questions about the nature of the media and media systems; about the relationship of media practice to justice and morality and about the social nature of public relations, the media and their use. Hence, the international public relations manager must be prudent while using the media to communicate with his various publics. He must avoid the legal and ethical pitfalls that lie like dormant volcanoes waiting to erupt against negligent and unscrupulous practitioners. As he engages in his professional practice, he will go into contract with media outfits and advertising agencies. He needs the knowledge of law of contract as well as agency laws in addition to other aspects of media law. While doing these, the public relations manager should avoid news manipulation, cover-up, sugar-coating,

insider-dealing and the like. All these have negative effects on organizations and their businesses, for without ethical behaviour, there is no credibility and without credibility there will be no business! The attitude of anything goes so long as one is not caught is unethical.

### **Some legal guide to successful international public relations practice**

#### **(1) Agency relationships law**

The law of agency in international public relations consultancy and practice is critical to successful business dealings with prospective clients. Agents, to Lyod (2005, p. 41) refer to people employed to do anything in the place of another. In ordinary commercial practice it is usually clear that when orders are given on behalf of the client, then it is to the client that requests for payment should be made. But in public relations and advertising practice, it is entirely different. The custom is that a public relations manager is an independent contractor who decides how to approach any assignment contracted to him. For instance, when commissioned, he carries out such assignments as commissioning of films, photographs and printing.

In such situations, the IPRO acts as a principal unless the contrary is clearly stated. He then enters into agreement with suppliers on his own authority, and it is to him and not the clients that such suppliers turn to for payment. The advice is therefore, that the public relations officer should at the outset, give the client an indication of the estimated expenses, get his authority to proceed, and then be put on funds to cover the costs. Otherwise, he will find himself personally liable to the suppliers if things go wrong.

#### **2. Contractual relationships**

A contract is an agreement enforceable by law (Lyod, 2005). between two or more persons to do some act, their intention being to create a legally binding relationship and not merely to exchange mutual promises. To enter into a contractual relationship, an international public relations manager must ensure that an offer for sale of a product is made, and not a mere invitation to treat. He must genuinely accept the offer. Both parties must ensure that they intend that there shall be a legal contract for sale. There must be an agreement on price referred to as consideration. This must be reduced to writing when the price is paid, so must also other terms of the contract if there are any. In case of landed properties, the document must be signed, sealed and delivered. The contract must be within the law and also possible. The parties must be eighteen years old to be eligible to enter into a legal contract. All these serve as a guide so that when one enters into contracts one must make certain that one is legally entitled to what one is contracting for. This helps so that if anything goes wrong one will be in a position to protect or enforce one's rights in law.

#### **3. Trade marks and passing off**

It is worthwhile to know that no person shall infringe another's formally registered trade marks nor pass off his goods or business as another's. When trade marks and logos are registered, the law forbids any other person from using same. According to Street (cited in Enemo (1998, p. 175) "the tort of passing off protects traders against misrepresentations aimed at their customers which are calculated to damage the traders' business or goodwill." In *A.G. Spalding and Bros V.A.W. Garage Ltd.* Lord Parker described the right protected by this tort as the "property in the business or goodwill likely to be injured by the misrepresentation." Hence, an IPRO must avoid using other companies' trade marks i.e

design, picture, or other arrangements used as identification marks. This protection which includes the appearance or get-up pictures on products, names closely resembling that of another company has in many countries been extended to patents and copyrights. For instance, in *Hines v Winnick*, the plaintiff bandleader broadcast a radio programme under the name “Dr. Cook and his crackpots.” The court restrained the defendant by injunction from putting another band on the programme under the same name.

Also in *Hendricks v Montague* (cited in *Enemo* (1998, p. 181) the Universal Life Assurance Society was granted an injunction restraining the defendant’s company which was incorporated subsequently from carrying on business as “Universe Life Assurance Association.” Hence, in *Niger Chemist v Nigeria Chemist*, Palmer J. (cited in *Enemo* (1998, p. 183) said:

It is not necessary to prove that there was any intention to deceive, this had been held in a long series of cases, and is not disputed. In this case, I strongly suspect that the defendants did infact choose a name and address as similar as possible to that of the plaintiff in the hope of diverting some of his business to themselves...

In order to avoid any infringement, the IPRO is advised to visit the Ministry of Trade of the country of posting. There, a register is kept that contains all registered trade marks with names and addresses of their proprietors, the dates on which applications were made for registration and the names and addresses of registered users. The register is a public document and open for inspection by anybody interested.

#### **4. Copyright laws**

As public relations are closely related to all forms of written communication, the IPRO should understand the legal principles governing copyright. To *Okonkwo* (1990, p. 175) copyright can be defined in two ways. The first is negative when it refers to the right of an author to prevent others from publishing or reproducing his work without his consent. The other is a right to do something. It is therefore, seen as the exclusive right to produce or reproduce the work or any substantial part of it or to perform or to publish a work. For *Loyd* (2005, p. 44) if you write a short story or a play or a song or paint a picture you have created something. It is part of yourself; you would then feel cheated if someone just took it and reproduced it, perhaps getting money for it, without your consent or permission. Copyright protects every original work, literary, dramatic, musical or artistic sound recording or cinematograph film, every television or sound broadcast.

For artistic work, the following, if original, are protected irrespective of quality: paintings, sculptures, drawings, etchings, engravings and photographs. For copyright to protect photographs, it must be agreed at the time the photograph is commissioned. If there is no agreement one does not have every right over the resultant photograph. One will own the copyright in the picture, while the photographer retains the physical ownership of the negative. The photographer cannot reproduce the picture without your consent, but he will charge you for the use of the negative if he discovers that the photograph is to be used for more than he anticipated when he charged a fee for the commission. Copyright usually lasts for fifty years from the death of the author. Artistic copyright usually subsists in a photograph for fifty years after the end of the calendar year in which it way first published.

## 5. The law of libel

Libel refers to defamation in written form. Libel, says Friend et al (2000, p. 376) is a broad term used to describe damage to reputation – legally known as defamation – that is caused by publishing or airing false information. “Reputation” in the legal sense does not only mean what others say about you, damage to reputation could mean a lost job or earning power, a damaged business, a personal sense of humiliation or reduced social standing or estrangement from friends and family.

To avoid such legal pitfalls, or traps an international public relations officer must guard against the following communication conditions precedent that orchestrate libel suits.

- 1) The information must be false.
- 2) The person libeled must be clearly identified, although not necessarily by name.
- 3) The information must have been published or otherwise viewed by an audience.
- 4) The reputation of the person has been damaged as a result.
- 5) The news organization must be shown to have been at fault for the libelous information. That may mean that reporters and editors were inaccurate themselves, or that they did not fully check the accuracy of information supplied by outside sources, or that they presented opinion or speculation as fact.

In addition, the IPRO should be wary of the following, according to Friend et al (2000):

- (a) Imprecise names and addresses that create false identification;
- (b) Vague language that creates false impressions such as suggesting that someone is guilty of a crime when the person has merely been charged.
- (c) Shallow sourcing and poor attribution that show that enough research has not been carried out on a story.
- (d) Representing speculations or conclusions based on scanty evidence as fact.

They concluded that most libel cases can be avoided by following fundamental editing guidelines and practices: Information must be accurate, language must be precise; facts must be clearly distinguished from opinion. Thus in *Awolowo v Kingsway Store Ltd.*, (1968, 2 HNLR 217), the defendants sold copies of a book titled “The one eyed man is king” containing portions highly defamatory of the plaintiff. The defence of innocent dissemination failed on the ground that the defendant had been negligent in not discovering that the book contained libelous matter since it had an intriguing title.

Hence, according to Trager, Russomanno and Ross (1007, p. 30) “Freedom to publish one’s views is a principle of universal practice, but when the press deliberately abandons the proprieties and sets out to poison its pabulum or to sow dragon’s teeth and dispense canards for the purpose of doing another a wrong, it is no different category from a free man that does like wise.” Thus in a libel contained in newspaper or a television show which is deemed published to everyone who read the newspaper or saw the television show, the following will be held liable: the author of the article, the editor, the printer, the publisher, even the news agent and street vendor (*Okotie Ebo v Amalgamated Press*, (1960) LLR 147).

Defamatory words written on a postcard or contained in a telegram are presumed to be published to post office officials. So also are defamatory letters sent out without being marked 'private', 'confidential' or 'personal' etc. It is also to be noted that in a libelous publication only one person other than the person defamed needs see the error in order for it to be legally published. In the eyes of some courts, that one outside reader constitutes a "public." According to Street (cited in *Enemo*, 1999, p. 26) when a defendant addresses his defamatory remarks to the plaintiff alone, he is not liable. He is not also liable where a father opens his son's letter or if an employee opens the sealed or unsealed letter of his employer. However, for these entire potentially libelous situation, the most effective defence is truth, provable truth fully documented, not hearsay.

#### **6. Invasion of Privacy**

Also, an IPR officer must be wary not to invade people's privacy. He should at all times avoid intruding on someone's privacy such as entering private property without permission, eavesdropping, using a telephone lens to take photos or video, or harassment. However, as observed by Challenger and McDams (2000, p. 386) unlike libel suits, truth is not always a defence against privacy suits. A story or photo can be accurate, but nevertheless could invade someone's expected privacy in a way that is not warranted by the importance of the event. They also drew attention to a body of law involving e-mail, web sites and online discussion group that is just beginning to emerge. They advised that web sites are generally safer than e-mail as they are by nature created for public consumption. In most cases, e-mail within a private office or a business has been regarded as belonging to that organization. It is not the private property of the individuals who write it; it is both ethical and legally wise to seek permission when borrowing materials from any web site. A great many people, they added, are weary of what they see as media intrusion into their lives, and journalists who eavesdrop on online discussions are practising yet another form of intrusion and surveillance.

#### **7. Hire purchase law**

As the public relations manager may, in course of business, have need to engage in hire purchase, he should be abreast of the laws that guide such transaction. Loyd (2005, p. 53) advised that prior to any agreement, the owner of the goods must state in writing to the hirer the cash price at which the goods can be purchased. The agreement must be signed and must contain: (a) The cash price (b) the hire purchase price (c) the amount of each installment that falls due, (e) a list of the goods covered (f) a notice informing the hirer of his right to terminate the agreement. He must be given a copy of the agreement. This is to protect the IPR manager as any breach of the conditions will disentitle the owner from recovering the goods from the hirer and also the security given (say by a guarantor), subject to the court's discretion.

8. Another legal mine that IPR manager should guard against in any public releases, report or advertorial is the offence of contempt of court Kamath (2000, p. 208) defined contempt of court "as any conduct or action that tends to bring the authority and administration of the law into disrespect or disregard or will interfere with or prejudice the parties litigating or their witnesses during a litigation." He distinguished between two kinds of contempt to include: (a) Contempt committed in the face of the court, and (b) Indirect

contempt or contempt out of court. He gave instances of contempt to include: surreptitiously returning to the court room having once been excluded from it; taking photographs of an accused person despite the order of court not to do so; publication of proceedings of a case being heard in camera or shouting obscenities at the person of the judge.

The out of court contempt (*ex facie curie*) may be divided generally into (a) false and grossly inaccurate report of court proceedings (b) such publications that may have a reasonable tendency to interfere with the orderly administration of justice, and (c) publications that scandalize the court, judges, counsel, parties or witnesses. According to Kamath, (2000) to be safe a report must not be partial or garbled, and it is not contemptuous to criticize adversely the purely ministerial act of court. Hence, to Lord Chancellor Cottenham (cited in Pannick 1987, p. 107) 'every insult offered to a judge in the exercise of the duties of his office is a contempt' not for the sake of the judge as a private individual but because "they [judges] are channels by which justice is conveyed to the people." This provides the rationale for the offence of contempt of court.

9. Last but not the least of the legal mines to be avoided is the criminal libel known as insult laws. According to Walden (2002, p. 208) in more than 100 nations, individuals – including journalists – can be imprisoned or fined for insulting or offending government officials and institutions. Insult laws, he noted, are still on the books in many of Western Europe's oldest democracies as well as in the world's most authoritarian regimes. Many countries with constitutional provisions guaranteeing freedom of expression and opinion nonetheless continue to punish criticism of the government. What makes these laws very dangerous is that in contrast to civil defamation, insult laws are designed to protect honour and dignity rather than reputation. They are used to punish truth as well as falsehood, opinions as well as factual assertions, satire, invective and even bad manners. The rule here is the greater the truth, the more the offence and the punishment. Unlike defamation, truth is no defense.

## **Conclusion**

Strict observance of the law of country of operation is critical to organizational success. That is why Friend, challenger and McAdams (2000, p. 393) cautioned media men to always remember that one suit can cost more than \$1 million in losses, and \$100,000 just to defend." Also Chamberlin (2000, p. 393) advised that every publication must have a good editor who knows the law of public communication. He asserts that "Editors must know the law because frequently they are the only people in the newsroom who are in a position to spot a legal problem before it winds up in print." To him, editors are sentinels, standing lookout for careless errors that can lead to legal problems. They can protect a publication from invasion of privacy suits caused by a wrong address, an incorrect middle name or a faulty outline that assigns a wrong identity.

Hence, public relations managers should strive to save his organization from publications that will likely plunge the organization into legal tussles. This is particularly important in these days of online publication and enormous pressure from competition. As observed by Chamberlin (2000, p. 393) "Online journalism demands a heightened awareness of copyright and trademark law." This is more so when one understands that "when journalists work online, they are tempted, even if unknowingly to use the work of others." He concluded with the following pieces of advice:

1. Editors must know when to call a lawyer to read over a story. This becomes necessary when concerns arise over copy that may cause charges of libel or invasion of privacy.
2. Whenever there is a need to print a major correction or retraction;
3. When anyone in the newsroom is served with a subpoena, summons or search warrant;
4. When a lawyer comes to the publication on behalf of someone intending to sue;
5. When anyone in the newsroom is involved in news gathering actions (such as recording conversations) that may be considered illegal.

Finally, public relations managers, editors, reporters, photographers, cartoonists and indeed all that are involved in public communication must bear in mind that when they publish or broadcast unsubstantiated claims, they bear the brunt of legal responsibility for damage to reputation occasioned. This is particularly true if cognizance is taken of the power of the media to pass information including unsubstantiated claims to a wide public.

### References

- Black, H. (1983). *Black's Law dictionary*, Boston: West publishing co.
- Black, S. (1962). *Practical public relations*, London: Medion Press.
- Chamber, B.F. (2000). *The law of public communication in* Friend, C., Challenger, D. and McAdams, K.C. (2000) *Contemporary editing*. Chicago: NTC Contemporary Publishing Group.
- Enemo, I.P. (1998). *Notes on the law of tort*, Enugu: PAMOR Ltd.
- Iheme, B. (1995). *A hand book on jurisprudence and legal theories* Owerri: Assumpta Press.
- Kamath, M.V. (2000). *Professional journalism*. Delhi: Vikas Publishing House PVT Ltd.
- Loyd, H. (2005). *Public relations*, London: Harper Collins.
- Ojobor, I. (2002). "Mass communication theories" In Stella Okunna (eds) *Teaching mass communication: A multi-dimensional approach*. Enugu: New Generation Books.
- Okere, B. (1989-90). "The relevance of teaching jurisprudence" in *The Nigerian Juridical Review*, Vol. 4, Faculty of Law, University of Nigeria, Enugu Campus.
- Okonkwo, R.C. (1990). "Advertising regulations" In Okigbo Charles (eds) *Advertising and public relations* Enugu: SNAAP Press Ltd.
- Pannick, D. (1987). *Judges*, New York: Oxford University Press.
- Street, H. (1993). *Street on torts*, London: Sweet and Maxwell.
- Trager, R., Russamanno J. & Ross, D. (2007). *The law of journalism and mass communication*, New York: McGraw-Hill Companies