

CONFESSIONAL STATEMENT UNDER THE IMO STATE ADMINISTRATION OF CRIMINAL JUSTICE LAW, 2020 - LIMITATIONS AND CHALLENGES.

PROF. OBIARERI, N. O.

DEMANDS PUBLIC APOLOGY FROM WOMEN NBA AFFAIRS MINISTER FOR CALLING A HIGH COURT **RULING 'KANGAROO JUDGEMENT'**

LAWPAVILION UPDATE AND MEMBERS' SUPPORT SYSTEM

FEDERAL HIGH COURT OWERRI JUDICIAL DIVISION TO FHC HOLD QUARTERLY INTERACTIVE SESSION WITH LAWYERS



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FROM THE CHAIRMAN'S DESK

I wish to commend to our members, this month's edition of the Heartland Bar Newsletter. The members of the editorial team have given us another piece to read. I have read in draft some of the items as contained herein and I am particularly intrigued by many of the articles. I invite all our members to find time to read through. I wish to again use this medium to reassure our members that we are committed to serving you and that we shall do without hesitation. God bless you and I wish us the best of the yule tide season.



My team and I are gladdened by the overwhelming reception of the October edition of the Newsletter of our dear branch. We are particularly gladdened because it was the maiden edition and we are assured of the support of our readers within the Bar and outside the Bar. In this edition, we had One-on-One interaction with the Honourable the Attorney General and Commissioner for Justice, Imo State, Chief C. O. C. Akolisa. We shall dedicate a section of our subsequent editions to having a One-on-One with persons of interest or persons occupying position of interest to our readers. We also have multiple intellectual articles in this edition. I commend to you, the November edition. Take a sit, relax and have an entertaining and educating read.

EDITOR'S NOTE

NEWSLETTER EDITORIAL TEAM



editor in Chie





GERVASE CHIKA



STELLA CHIDOZIE



Content Editor

NNENNA EKE

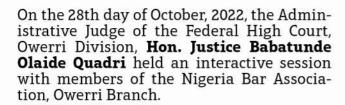




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FEDERAL HIGH COURT OWERRI JUDICIAL DIVISION TO HOLD QUARTERLY INTERACTIVE SESSION WITH LAWYERS



In attendance during the session were, the NBA Chairman, Mr. Ugochukwu Damian Alinnor who was accompanied by other Bar leaders. The maiden interactive session was well attended by a good number of lawyers including M. O. Nlemedim a former Attorney General and Commissioner for Justice, Imo State, former Chairmen of the NBA Owerri Branch, Mr. Lawrence Nwakaeti, Mr. Damian O. Nosike and Nze Jude I. Ogamba. Others are Chief D. C. Ndiokwere, C. U. Njepuome, Chief Eddy Onyema, Harold Opara, C. B. N. Nworka, Ngozi Chibuisi, Princess Ngozi Anyanwu, S. E. Ibechem, F. N. Otuekere, Kingsley Onwuamalam among many others. Also in attendance were lawyers in the services of different government agencies as lawyers from INEC, NDLEA and the Correctional Service among others. The meeting was an avenue for the new Judge and the Bar to rub minds together on issues affecting operations of the Court and to further strength the already cordial relationship between the Bench and the Bar.

The inaugural interactive session heralded what is expected to be a new beginning as the newly posted Judge expressed confidence and readiness to work hand-in-glove with NBA Owerri to ensure a smooth dispensation of justice. Some of the germane issues which were raised include the need to always give quick and adequate notice to counsel and litigants whenever the court would not be sitting. The Court also noted that counsel should always file letters of application for adjournment before the date of hearing.

Another strong talking point was on the issue of extortion by some staff of the Court. The lawyers noted with abhorrence the alarming rate of extortion and the seeming entitlement dispositions of such staff. The Honourable Judge in his reaction stated emphatically that there can be no extortion if such a lawyer is not disposed to it. He equally pointed out that such things happen when lawyers try to maneuver after defaulting

to comply with due process. He gave examples that payment for remita ends by 2pm and anyone who comes later would be looking for a way to do the processing through the back door as well as others who file their processes out of time would want to use undue influence over such staff. He therefore called on all stakeholders to always play by the rules and report any staff with such attitude personally to him.

In the same vein, other issues particularly about having the deponent personally in court and the accompanying difficulty with regards to criminal matters were extensively discussed. The Court advised that since the Federal High Court is one, filing of depositions can be done in any other jurisdictions and sent to the Court. In addition, a Secretary or relation can depose to such Affidavit. The worrying spate of impersonation of lawyers by non-lawyers and illegal incursion into the legal practice and use of the seal and stamp were discussed and suggestions were made to curb it.

In the course of the interaction, the non-availability of a robing room and rest room for lawyers was brought to the attention of the Judge. He immediately approved that one of the rest rooms be made exclusive to lawyers forthwith. He also stated that arrangements would be made to convert one of the office to a robing room for lawyers or find a suitable place for it within the Court premises. The meeting ended on a lighter note with light refreshments provided for all who were present.



NIGERIAN LAW SCHOOL'S PRINCIPAL DATA PROCESSING OFFICER ODEH, 2 OTHERS DISMISSED OVER ALLEGED INVOLVEMENT IN EXAM MALPRACTICES

The Council of Legal Education has approved the immediate dismissal of three staff of the Nigerian Law School over their involvement in examination misconduct in the May 2022 Bar final (resit) examination which is contrary to para 5.04.9 of the Condition of Service guiding staff members of the Law School.

It is gathered from sources familiar with such matters, that the Council adopted the recommendation for dismissal at its last Council meeting held on November 16, 2022, following months of investigation and probing conducted by the Staff Disciplinary Committee of the Law School.

The trio of Mr. Idoko Odeh, Mrs. Precious Chika Nwachukwu, and Mr. Gibson Uzodinma were accused of various degrees of exam misconduct.

While Odeh, a principal data processing officer with the Nigerian Law School, alleged to have reproduced a student identity card for one Mr. Pascal Bekongfe Aboh, a lawyer, to enable him take the resit exam for Benjamin Kayode Orekoya; the duo of Nwachukwu and Uzodinma were alleged to have facilitated, and received gratification for, the exchange of a student passport belonging to a candidate – Wobo Prince Adele-Owhor, to enable one Mr. Godknows Aliegbulam Wodo, to take the test for the said resit candidate.

Source further confirmed that the actions of the three staff contravened various regulations governing the code of conduct for staff members of the law school, including penalties of "serious misconduct", "acts unbecoming of a public officer", and "undivided loyalty (to the Council of legal education)" as defined under para 5.04 of the Condition of Service of Council of Legal Education.

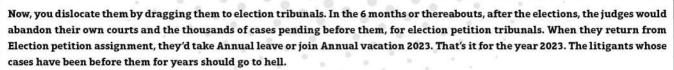
It is also learned that those present at the Council meeting included the NBA President, Y.C.Maikyau; Dean of Law, Usman Danfodiyo University, Prof. Rufai Muftau; Attorney General of Kogi State, Ibrahim SaniMuhammed, SAN; the Attorney General of Kastina State, Mrs. Asmau Mukhtar; the Secretary of the Council, Mrs. E.O. Max-Uba, among others.

The Council further resolved to forward a letter to the Nigerian Bar Association to take disciplinary measures against all (lawyers, and) persons involved, including for previous acts of indiscipline.

WHY THE JUDICIARY SHOULD USE RETIRED JUDGES, SENIOR LAWYERS AND SCHOLARS FOR ELECTION PETITION ADJUDICA

In my opinion, there're hardly any cogent reasons to have taken any serving Judge away from his jurisdiction, for election matters.

It's part of the problem we're talking about; how many judges are in those states? Do we have enough already? How far have they performed in clearing the backlog of pending cases on their cause lists?



Are election cases more important than the tens of thousands of cases pending before each court for years — in some cases for up to 10-15 years?

Why take these judges away and suspend dispensation of justice in those other cases?

Why not consider using retired Magistrates, judges/justices of High Courts, the FHC, NICN, CA, SC. Many are retired but very active, vibrant, not tired!

Nonaligned SANs, scholars and other senior lawyers and activists. Many are willing and capable. After all, election petition job is well remunerated; that in itself is huge motivation

Besides, using serving judges makes the judges susceptible to control by the party that controls the incumbent government.

Seasoned scholars, SANs, lawyers and retired jurists (chosen based on track record of performance and integrity) will be more fearless, courageous impartial and independent-minded.

by Sylvester Udemezue (Udems)

08109024556; mrudems@yahoo.com

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MUSLIM GROUP, MURIC DRAGS SOCIAL RIGHTS ACTIVIST, MALCOLM OMIRHOBO, ESQ. TO DISCIPLINARY COMMITTEE FOR DRESSING LIKE JUJU PRIEST IN COURT.

"You have 24 days to Defend Yourself against Islamic Group's Professional Misconduct Charge – LPDC "

Islamic Rights advancement group, Muslim Rights Concerns (MURIC) has dragged prominent Social Rights activist, Malcolm Omirhobo esq to the Legal Practitioner Disciplinary committee, LPDC, for appearing in court with his traditional regalia in protest/obedience to the approval

to the use of Hijab by Muslim Lawyers by the Supreme Court of Nigeria.

In the Petition with case number BB/LPDC/896/2022, the Muslim group is asking the LPDC to discipline the activist for wearing Juju Priest attire to supreme court in exercise of his fundamental right to worship and in obedience to supreme court ruling on Islamic hijab.

The Legal practitioners Disciplinary Committees, of the Body of Benchers, LPDC has given Social Rights activist, Malcolm Omirhobo Esq, 24 days to respond to the petition for professional misconduct written against him by Muslim Rights Concern, MURIC, for appearing in courts in Juju Priest attire.

The LPDC 24 days notice to Omirhobo Esq is contained in a letter dated 7th day of October 2022. Confirming the 24 days notice, Malcolm Omirhobo wrote on his Social media handle;

"I have just received a frivolous and vexatious originating application in respect of the allegation of misconduct against me for dressing as prescribed by my religion in exercise of my fundamental right to freedom of thought, conscience and religion by Muslim Rights Concern (MURIC) from the Body of Benchers, Legal Practitioners Disciplinary Committee. I am to file my defence within 24 days. – Malcolm Omirhobo"



NBA DEMANDS PUBLIC APOLOGY FROM WOMEN AFFAIRS MINISTER FOR CALLING A HIGH COURT RULING 'KANGAROO JUDGEMENT'

The Nigerian Bar Association (NBA) has asked Pauline Tallen, the Minister of Woman Affairs and Social Development, to withdraw her comments on a judgement of the Federal High Court and tender an apology within seven days.

NBA stated this in a letter signed by its President, Yakubu Maikyua, and dated November 14.

The judgment of the court in a suit between Nuhu Ribadu and the All Progressives Congress (APC), delivered on 14th of October 2022, held that the Adamawa State APC governorship primary election, which took place on 26 May 2022, was invalid having been conducted in violation of the Electoral Act 2022 and APC's constitution and guidelines.

The court consequently voided the return of the second defendant, Ahmed Aishatu, as the winner of the election and also refused the prayer for fresh primaries.

Responding to the judgement, the minister had, during her interview with newsmen at the reunion and annual general meeting of her alma mater, Federal Government Girls' College, Bida, referred to the judgment as "a kangaroo judgement" and also went on to justify her remarks with comments which were disrespectful and contemptuous of the court.

While noting that the NBA does not have any interest in the matter and holds no brief for any of the parties to the dispute, the NBA president restated the association's steadfastness and commitment to its responsibility of protecting the integrity and independence of the courts.

"Your comments were clearly calculated to impugn the integrity of the Court, bring it to disrepute and incite the public against the Judiciary," the letter stated.

NBA advised the minister to appeal the decision of the court and refrain from using derogatory language in reference to the court

ONE ON ONE WITH THE HONOURABLE ATTORNEY GENERAL AND COMMISSIONER FOR JUSTICE, IMO STATE

Can we meet your sir?

A. My name is Chief C. O. C. Akolisa. I am the Honourable the Attorney General and Commissioner for Justice of Imo State Your name. I am from Awo Idemili in Orsu Local Government Area of Imo State. I was called to the Bar in 1986. I had my secondary education at C. I. C. Enugu and was part of the first set of students admitted to study law at the then Imo State University, Aba Campus. Thereafter I proceeded to the law school and upon call to the Bar, I started law practice in Orlu with I. I. Nnodum who later became a Judge of Imo State. I branched out to open Amanihe Chambers in 1990.

Q. What were you into before your appointment as the Attorney General and Commissioner for Justice, Imo State.

A. I was a private legal practitioner here in Owerri and participating in Politics. In fact, since after graduation from the University, I have always combined law practice and politics. Some people were advising me that from what they see in me, I have a special knowledge of the law. They wondered why I was mixing law and politics. They felt that was bringing my practice down. But I see Politics as a vocation. I don't see it as my full career. That's why I maintain the practice of the law with politics. So throughout my stay in politics except for the small period I was out of politics, I'd always practice law. And that was why I was happy when the governor appointed me as the Attorney General which will also enable me to be going to court. I he had given me Commissioner for any other ministry I could have rejected it because it will not enable me to practice law. Because I don't want to be out of practice.

Q. What are the present challenges of the Office of the Attorney General of Imo State and how have you been able to approach those challenges?

A. I will be forthright with you. The biggest challenge I am facing here is how to carry

out and actualize the visions and projections I have for the ministry to rise beyond the stage it is today. First of all, when I came here, I identified that this ministry is not suitable for law officers to practice maximally. There is nothing in this ministry both in the building and in the structure of the ministry of justice that permits for law officers to optimally practice law and meet their fellow lawyers outside the ministry and be proud of themselves as lawyers. And those are the first things I put to the governor and I try to make the government realize that they have to upgrade the ministry of justice by first of all removing the ministry of justice from the state secretariat. Most states in Nigeria have distinct structures for their ministry of justice. If you go to the Abia State Ministry of Justice of Justice it is removed from the State Secretariat. They have distinct building, well equipped, lawyers will sit down in their offices and practice the law and defend the government and government actions. But here, our lawyers don't have offices. They are roaming the streets. They come to court from their houses. You can't even check their movements whether they go to court or not. Their sectional heads do not have a tab on them. They tell me that they are not motivated for the past eight years. They have not been promoted and all sorts of things. They go to court with their own salaries, no vehicles. At the end of the day, they are suffering so much. So I pity them, the lawyers that are in this ministry. They complain that their salary is too low because it was brought down by the former governor and then when we tried to raise it up a little by maintaining their allowances and all that. But still, it is not adequate

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CHIEF C. O. C. AKAOLISA

The Honourable Attorney General of IMO State.

for the officers. So that is one of the challenges I have here. It is affecting the practice of lawyers here. They are not motivated. Each day we hope that the finances of the state will come up so that we will be able to take necessary steps. But you will not blame the government because what I see is that there has been progressive deterioration of facilities in the state. If these roads the governor is putting billions have been done by the past administration after 8 years, will the governor spend that money to be doing those roads? That is the point. We will channel it into other things in the state and then life will become better. But here, there is recycling of infrastructural development every time because they are not properly done. So, we hope that with what the governor is doing now, building stable strong roads, by the time he finishes his tenure, anybody coming after him will not suffer again to start doing those roads. And the resources will be channeled to other things. So, it is still in the budget that the new ministry of justice may be constructed in 2023. That is my expectation. Since we came, I have been talking about it, and I keep receiving promises and assurances that it will be done but due to financial handicap, it is not yet done.

Q. How pivotal is the role of the Ministry of Justice in the Government of the day in Imo State?

A. There is no gainsaying in the fact that the ministry of justice plays prominent and pivotal role in the government of Imo State. Because, ;everything about government litigation falls on the ministry of Justice and you can understand that we came in at a time when the citizens were disenchanted, there were lots of grievances and lots of actions against the past government based on their interventions in the life of the ordinary citizens, seizing their lands by acquiring unlawfully. So, there are lots of litigation. Before we came in the ministry of justice does not receive up to 20 civil suits in a year. But you can imagine now, there is no day we do n ot receive new writs up to 10. In a year, we receive more than a thousand summons from different courts. These are increased litigations against the government. So, that is something that we saw here and it is a challenge we are facing.

Q. What are the reforms so far carried out and the anticipated reforms in the Justice sector in Imo State under your watch?

A. We have tried to do a lot of things. Firstly, I was able to look at the Administration of Criminal Justice Act, and we domiciled it in Imo State. That was the first law that the governor signed. The Administration of Criminal Justice Law. That is to our credit. And we are in collaboration with the African House in London to come and train our judges, which they did. They collaborated with the judiciary but essentially it was me that attracted them through the African House in London. So the English judiciary came and trained our judges. They are coming again to train our magistrates. That one is even imminent. Before the end of the year, we will get the signal for it. They are also going to come and train our prosecutors. So, I have been collaborating with these agencies. So we have another collaboration with the Hague Institute innovation in Law. We partnered with them to develop our own justice innovations system which at the end of the seminars we had here, they granted us leave to use Imo State as one of the pilot states in Nigeria for the justice innovation lab. And the justice lab for Imo the workshops are on now. At the end of the day, what comes out of the justice lab will enable us purely identify the people centered pathways which are the innovations that we need to advance the course of justice in Imo. They call it the people centered pathway to justice innovations. So, we have the five steps that came out from the workshop and we are using it to deal with the issue of justice innovations. But the most important thing we got out of the justice innovation workshop is that we identified local arbitration as one of the key elements of modern justice system. And we now said that it will be important to establish community justice centers in all the autonomous communities in Imo State. We are presently working on a draft that we will send to the House of Assembly to enable us bring out the Imo Community Justice Centers. At the end of the day, the House of Assembly will create by law, the Imo Community Justice Centre Law. That law will establish the Imo Community Justice Centers. Because we already have an existing law which is the Imo State Multi Door Court House. But the multi door courts are established at the state and local government levels. We now want to take it to the communities because the world is moving towards local justice and we want to set a pace in the whole world as the first to initiate a community justice system in Africa and the world. Our partners, the United Nations and the Hague institute, they are interested in that innovation. We are also concerned about the human rights situation in Imo State. And based on that, we are establishing very soon, Peoples' Human Rights Department in this ministry. We used to have the department of fairness and social justice but it didn't bring out the focus of what we want to achieve. We want to have a department where aggrieved persons can direct their grievances to and the ministry can try to assist them to secure justice in whatever form. We can give out their cases on pro bono or the ministry will pay and the lawyers will do the cases for them. By the end of this year, we will be launching the new Imo State Law Reports. That one, we have gone very far. It is for the printers to bring the final copies. The department of Law Reform is working on reviewing all the laws and then will no longer need to be citing the Laws of Eastern Nigerian anymore. We will be quoting laws of Imo State. By the 1st quarter of next year, we should have them.

Q. What is your assessment of the welfare and remuneration of Law officers? Are there any plans to improve on same?

A. Like I said before, as soon as the economic fortunes of the state increase, of course, monies will go into improved salary of civil servants.

Q. What is being done to increase the monetary jurisdiction of our Magistrate Courts? For instance, in Rivers State the Jurisdiction of the Magistrate Courts was just increased from Seven (7) Million Naira to Ten (10) Million Naira.

A. This is a very nice question and it came at the right time because we just sent to the Imo State House of Assembly a bill to amend the Magistrate Court Law. In that Bill, what we reflected there is not up to the Rivers own but it is a substantial increase. By the time they do the first reading, it will come for public hearing and by then, the NBA will go and make their own inputs and we will go and make our own inputs. The Bill is in the House of Assembly now.

Q. The National Industrial Court, Owerri Division has been under lock and key. What efforts are being made to re-open the Court and restore access to Justice through that court?

A. We are making efforts and we have given them all the assurances, they said they need assurance from the Security Council, so we have appealed to the governor and we are working on it.

Q. What efforts are being made to forestall a re-occurrence of the saga?

A. Majorly, what caused that problem was the inability of all the parties in the conflict to come to terms with reality and agree on what is right and what is fair. Today, Madumere has not been paid, the government has been bruised. But we called for dialogue. I invited him. I called him here and we discussed it. And we said, the government cannot pay you impress. Government can not pay you security votes when you were not in office. When you left, somebody else was occupying that office and the person was receiving that impress. It is not an emolument. It is something that is meant for the office. Let us remove them. You were not the only one that had such a case. Agbaso had such a case. Jude Agbaso, he came here we settled the matter. Removed those claims that were unreasonable and he received his money full. So, why did Madumere insist that we must pay him one point something billion. His main allowances were not up to 300 million. His genuine claim. But he refused. The government cannot afford to loose one point something billion and that was why the dialogue failed. So, you cant blame the government alone because the government cannot sit down and allow somebody to partake in money that is not due to him. That is the crux of the matter. If all parties resolved early, it will not have gotten to that point. As long as I am here, I am amenable to settlement. I appeal to many others that government cannot pay all these claims and they understand. That is what we expected the former deputy governor to do.

Q. What is your take on the clamor for separation of the office of Attorney General and Commissioner for Justice?

A. It is very important. For me, as a pure practitioner, I will like the Commissioner for justice to face administration while the Attorney General remain in his sacrosanct office to defend the rights of the citizens even against the government and other statutory roles. So, I am for it. I will like the two offices to be separated. Because that is the problem we have here. When you are a political appointee and you are the Attorney General and Commissioner for justice, the two offices are mixed together, there are certain limitations simply because you are a political appointee. Your tenure as Attorney General under the Constitution is not double entrenched. You see, a judge once sworn in cannot be removed but an Attorney General once appointed can be removed any time the governor wants him removed. There is no security of tenure for the Attorney General. Those amending the constitution have not considered it appropriately to determine the proper reason why there should be an Attorney General in a state. If that is recognized, you should be able to understand that there are offices created and which requires two-third majority of the house to remove the occupant of the office. That is double protection which is not available for the Attorney General. And that is the key commissioner mentioned in the constitution. So, for the Constitution to recognize that there should be an Attorney General, I am calling for that office to have that security of tenure as guaranteed by the constitution for other key offices. That will make it possible for an Attorney General like the Chief Judge of the State not to be easily removed as long as he is doing the work of that office. If they want to separate the two offices, let them separate them but once the Attorney General is appointed, let him be properly protected by the law. That is my take.

Q. Your book "The Anthology of African Jurisprudence", what was the motivation behind that book and how do you combine writing with your duties as the Attorney General and Commissioner of Justice?

A. I work and do my private writings at nights. I am still writing another book. This one is a political one which will come out very soon. It is going to capture our journey to the governorship of Imo State.

will come out very soon. It is going to capture our journey to the governorship of Imo State. The title is the pains of loyalty. We talk about the gains of loyalty, nobody talk about the pains. In that book, I am going to x-ray the pathway to Hope Uzodinma's governorship. A lot of people say, Hope Uzodinma is a Supreme Court governor or that Emeka Ihedioha did not get fair hearing at the Supreme Court. But as a practitioner and someone who packaged that petition, I packaged it. It is wrong for anybody to say that the Supreme Court gave us judgment. The Supreme Court gave its judgment according to law. Because by the time there was a dissenting judgment at the Court of Appeal, you would have seen that we did what we were supposed to do. The defense of Emeka Ihedioha was poor. Without sounding disrespectful to the lawyers who did the case, they took a lot of things for granted. Our case was simple, I prepared the petition. Our case was built purely on exclusion of election results. 388 polling unit results were not collated. And we have the results as issued to us by the presiding officers in the polling units. We frontloaded the results, tendered them. They wanted the tribunal to reject those results raising technical issues that had not bearing with what we were doing. And the Tribunal admitted those results. What did we do next, we subpoenaed the Police to bring their own copies of that same result of the 388 units. The police brought them. Evidentially, they did not have anything to counter what we tendered. And they were expecting the court to give them judgment. The PDP did not tender their own. They were only saying this result is faint, you didn't write 3 well, this one did not have this or that. Issues that do not affect the score in the election. All the results went in that of the Police went in to corroborate our own. What do they expect the court to do. The Tribunal said it was dumped. At the court of Appeal, they said it was dumped but one judge said no, the petitioner has proved his case. Having called the Police and also tendered their own. PDP did not tender their own. INEC did not tender their own. So all these things on how Hope was imposed by Buhari and the Supreme Court, is a lie. They did not do what they were supposed to do from day one. That my book will bring out everything. I will upload the tribunal judgment, the Court of Appeal Judgment, the Supreme Court Judgment and the review case so that history will have it.

Q. Tell us about your hobbies and what keeps you engaged when you are not on your duties as the Attorney General and Commissioner of Justice?

A. I stay in my house, read my law books, my novels and I pray to my God. I swim and I play lawn tennis.

Chief C. O. Akaolisa

The Honourable Attorney General and Commissioner for Justice, Imo State

EXTRA

HOW LAGOS LAWYER STORMED FIRST BANK, DISRUPTS OPERATIONS, EXCHANGED BLOWS WITH POLICE OFFICER OVER MISSING MONEY

There was pandemonium at the Ikotun branch of First Bank PLC in the Igando-Ikotun LCDA of Alimosho LGA, after a 43-year-old legal practitioner, Barrister Enyi Sunday, disrupted activities at the bank over the disappearance of an undisclosed amount of money from his account in the bank.

According to media reports, the fracas attracted the attention of the Police officers attached to the bank, who attempted to stop him from entering the bank in order to see the Manager in a bid to ask why the money in his account was emptied.

The stoppage of entrance led to a serious fight between Barrister Sunday and one of the Police officers attached to the bank, Inspector Siyaka Nuhu and both injured themselves in the process.

The Police at the Ikotun Division was contacted and mobilized; they went to the bank and intervened. They overpowered and arrested Barrister Sunday and transferred him to Area M Command, Idimu, over his conduct at the bank.

During interrogation, Barr. Sunday told the Police that First Bank siphoned the money in his account and when he went to the branch as a customer to ask to know why the bank would tamper with his money, he was prevented from entering the bank.

However, the Police found him culpable of disrupting operations at the bank, assaulting Inspector Nuhu, and tearing his uniform in the process. He was subsequently charged before the Ejigbo Magistrates Court for conduct likely to cause a breach of public peace and assault, wherein he pleaded not guilty.

The prosecutor, SP Benedict Aigbokhan, did not object to his being granted bail because it was a bailable offence.

But the defendant told the Court that it lacked jurisdiction over the matter because the matter of the bank-customer relations was a Federal Government matter, which has a higher jurisdiction.

Presiding Magistrate, Mrs K.A. Ariyo, ruled that the offence was a criminal offence and subsequently granted him bail in the sum of #20,000 with one surety in like sum.



The Ugochukwwu Alinnor led Executive committee of the NBA Owerri branch in it's determination to give human rights issues it's deserving priority and in line with the NBA Constitution has set set up the Human Rights committee of the branch. Members were drawn from across the official and private bar.

The committee has since swung into action receiving and attending to several petitions. The first petition recieving attention of the committee is the one regarding Favour Chikpe and her son. As at today, the baby is recieving medical attention at the federal medical centre Owerri. The committee in liason with the National Council of women Societies has opened an account for the baby. Concerned individuals and groups can donate towards the welfare of the child. The committee continues to work with the Police with a view to tracking the culprit. The second petition relates to a young widow who is facing inhuman treatment and deprivation from her marital home in Ngor Okpala while the third petition relates to an attempted murder of a woman by her step son in Awara Ohaji Esbema. The committee is already giving these and other complaints the desired serious attention. Egbema. The committee is already giving these and other complaints the desired serious attention.

The committee in an effort to progressively achieve it's mandate has proposed some measures which we hope that if implemented would not just serve as a standard procedure of practice but would also aid the committee in realizing her objectives. Some of the proposals resolved to be implemented by the committee include:

- Petition boxes to be produced and kept at The High Court, the Magistrate Court, Maria Assumpta Cathedral Owerri, Cathedral of the Transfiguration of our Lord Owerri as well as the Federal Medical Centre Owerri. These five centres would serve as the pilot centres pending the availability of funds to accommodate more centres. Producing the boxes and making inscriptions on same costs ten thousand (N10,000) naira each. Individuals and groups can donate towards the project.
- Litigation Director: the committee has resolved to appoint suitable members as litigation Director and assistant litigation Director. This is aimed at entrusting responsibility to specific individuals whose core mandate would be to lead the committee's efforts in issues requiring litigation.
- Welfare Director: the committee also resolved to appoint one of her members welfare Director to handle specifically complaints bordering on welfare of petitioners. The welfare director would also have an assistant.
- Treasurer: the committee also resolved to appoint a treasurer to oversee the individual financial contributions which the committee members have already started making towards the realization of the committee's mandate.

Sensitization of imolites: the committee has opened talks with media houses in the state both in the print and electronic sector with a view to guaranteeing access to information by deserving victims of human right abuses. This effort would start yeilding fruits before the next edition of this newsletter.

Human Rights Day: the committee is aware that December 10 annually is celebrated Human Rights Day world over. To this end, the committee is putting measures in place to celebrate the day. The following programmes are being proposed though availability of funds would finally determine what we embark upon.

- Newstalk on radio Roadwalk with branded shirts and caps.
- Press Conference Radio interview (phone in)

The committee is desirous of positively impacting on the lives of imolites within its lifespan especially considering the perilous times we have found ourselves. The committee beckons on well meaning members of the bar and bench to kindly assist her in the discharge of this onerous task.

For further inquiries kindly contact; DR MRS CHIOMA EMUKAH (08132003688) - Chairperson GODWIN IYKE UMAH ESQ (08037788319) - Secretary

NBA ENCOURAGES MEMBERS TO EMBRACE HEALTH INSURANCE SCHEME

The National Health Insurance Authority(NHIA) has disclosed that the agency will partner Nigerian Bar Association(NBA) on operational guidelines and innovative financing to attain Universal Health Coverage (UHC) target by 2030.

The Director-General of NHIA, Prof. Mohammed Sambo disclosed this when he received the NBA President at the agency's corporate headquarters in Abuja. Sambo said, "NBA would be part of operational guideline for NHIA, and that it would also be part of the innovative financing committee of the organisation.

We have established a committee on innovative financing, NBA will be part of that committee, we have gone to Rwanda, and we have seen the way they operate their innovative financing committee. The system has made their health insurance to be more effective, we are going to be working together until we meet our target of Universal Health Coverage (UHC) before 2030.

Sambo also commended the desire of the NBA to step up the enrollment of lawyers for the insurance scheme, adding that such a move is gladdening. "NHIA will not only engage the lawyers with training, and that they will be captured in the forthcoming summit plan to be organised by the agency.'

Earlier in his remarks the NBA President, Yakubu Maikyau, advised its members to embrace the nation's health insurance scheme, saying its benefits are enormous. Maikyau said the association had gone through the National Health Insurance Act (NHIA) and was encouraged by the provisions in the document. He commended his predecessor, Olumide Apata, who began the process of initiating the health insurance scheme for members.

Maikyau said NBA had enjoyed a good relationship with the agency initiated by the Apata administration, adding that he is willing to sustain the collaboration for the benefit of both organisations. "We want to align with the objectives of NHIS, especially on the economic benefits of having healthcare access for all Nigerians. A healthy nation guarantees productivity."

The NBA has perused NHIA and is delighted that health insurance is now mandatory for all Nigerians; NBA's first responsibility is to ensure member's well-being and healthcare rights they can enjoy. Programme is being held to persuade lawyers to undertake the health insurance, 1000 names have been compiled to take advantage of free health insurance cover.

"Premium will be paid for this 1000, an additional 1000 members is being planned to cover in the second year of our administration."

NHIS can call on NBA whenever the need arises to discharge its duty, we will interrogate where necessary and have a purposeful interpretation of the law. "We will be available for training that will be conducted in NHIS so as to understand the workings of NHIA," he said. Maikyau also called on President Muhammadu Buhari to support the NHIA in the area of funding, noting that additional funding is needed by the agency to be able to carry out its mandate.



Prof Obiaraeri, N. O.*

CONFESSIONAL STATEMENT UNDER THE IMO STATE ADMINISTRATION OF CRIMINAL JUSTICE LAW, 2020 - LIMITATIONS AND CHALLENGES.

1.0. Introduction

This epigrammatic presentation will examine whether non-compliance with the mandatory requirements in section 18 of the Imo State Administration of Criminal Justice Law, 20201 on the procedure to be adopted in obtaining confessional statements will lead to invalidation of a confession that meets the criteria set down in section 29 of the Evidence Act, 2011 and whether the provisions of the ISACJL are superior to the Evidence Act, 2011? These queries will be resolved through analysis of relevant provisions of the Evidence Act and the ISACJL, 2020 alongside recent decisions of the superior courts on analogous provisions under the Administration of Criminal Justice Act, 2015² and the Abia State Administration of Criminal Justice Act. 2017.

2.0. Statutory and judicial definitions of confession

Section 28 of the Evidence Act, 2011 defines confession as "an admission made at any time by a person charged with the commission of a crime stating or suggesting the inference that he committed the crime".3 In Ofordike v Sate,4 the Supreme Court defined confession as "a statement by a defendant which unequivocally confesses to the commission of an offence charged. Such a statement to be of any probative value, must be clear, precise and unequivocal. It must also be direct, positive and should relate to the accused person's own acts, knowledge or intention, stating or suggesting the inference that he committed the crime charged". A confession is an incriminating admission.5

Test of voluntariness of confession and requirement of trial within trial 3.0.

Section 29(2) of the Evidence Act, 2011 contains two litmus tests of voluntariness of confession namely-

- (a) Was the confession obtained by oppression of the person who made it (section 29(5) of the Evidence Act defines "oppression" to include "Torture, inhuman or degrading treatment and the use of threat of violence, whether or not amounting to torture")?
- (b) Was the confession obtained in consequence of anything said or done which was likely, in the circumstances existing at the time, to render unreliable any confession which might be made by him in such consequence?

There is a proviso to section 29(2)(b) of the Evidence Act to the effect that the court may allow such confession if the prosecution proves to the court beyond reasonable doubt that the confession was not obtained in a manner contrary to the provisions of section 29 of the Evidence Act, 2011.

Where the defendant admits making the confession but denies its voluntariness (timeously not as afterthought),6 the Court is obligated to conduct a trial within trial to determine its voluntariness.⁷ Trial within trial is not expressly provided for in the Evidence Act⁸ but it has by judicial practice become the only process of testing the admissibility of a confession where it is challenged on any of the two grounds described in section 29(2) of the Evidence Act. This is different from denial or disayowal of authorship of the confessional statement which does not warrant the conduct of a trial within trial. In Dele v State,9 it was held that confession does not become inadmissible merely because a defendant denies having made it because such a denial is an issue of fact to be decided in the judgment.

in tital was adjudged a legal necessity in Offordike v State (2019) LPELR-46411 (SC). r v State (2004) 18 NWLR (Pr. 905) 292. WLR (Pr. 1229) 508.

i, Ph.D (Law), B.L., etc., is a Professor of Law/Former Dean, Faculty of Law, Imo State University, Owerri, Nigeria red to as "ISACIL".

neuvalisative reterred to as "ACIA". See llsemison v State (1989) 3 NWLR (Pt. 110) 455. GOIG) IEELR-4611(ISC) (Pp. 15-16 paras. A) per Okoro, JSC. See N.O. Okaraert, Contemporary Law of Evidence in Nigeria (Crayford Kent, United Kingdom, Whitmont Press Ltd, 2012) 90-94. See yolli v State (2022) LPELR-576655CC.

4.0. ISACJL, 2020 and confessional statements

Against the foregoing pithy expositions on the principles for determining voluntariness of confession under the Evidence Act, 2011, it remains to interrogate the provisions of the ISACJL, 2020 on confessional statement.¹⁰ The ISACJL, 2020 was influenced in part by the ACJA, 2015.¹¹ Hence, the similarities and differences between the procedures for obtaining confessional statements under the ACJA, 2015 (which applies to Federal Courts) and the ISACJL, 2020, will be fully examined. Section 15(4) of the ACJA provides that a police officer shall ensure that the "making or taking" of a confessional statement "shall be in writing" and "it may be recorded electronically on a retrievable video compact disc or such other audio visual means". In addition, section 17(2) of the ACJA provides that the statement of a suspect (whether a confession or not) may be taken in the presence of a Legal Practitioner of his choice or an officer of the Legal Aid Council of Nigeria or an official of a Civil Society Organisation or a Justice of the Peace or any other person of his choice. On the other hand, under section 18(2) of ISACJL, where a suspect "volunteers to make a confessional statement", the police "shall ensure that the making and taking of such statement is recorded on video or other retrievable electronic device" provided that in the absence of video facility, "the statement shall be made in writing in the presence of a private Legal Practitioner or any other person of his choice". Under section 18(3) of the ISACJL, the Legal Practitioner or any other person in whose presence the confession was made shall also endorse with his full particulars an indication of having witnessed the recording thereof while it is mandatory that the confessional statement or its endorsement "shall be made in the presence of the officer in charge of the Human Rights Desk, where available or a superior police office in the absence of a Human Rights Desk Officer" under section 18(4) of ISCAJL.

From the foregoing, it is axiomatic that the ISACJL laid down more elaborate mandatory prerequisites for obtaining confessional statements than the ACJA (although space constraint will not allow for elucidation). Suffice it to say that both legislations seek to check the practice of extraction of confession by unlawful means thereby eliminating the cumbersome procedure of trial within trial.

5.0. Pre-eminence of the Evidence Act over the ISACJL, 2020 on matters of evidence

Specific to ISACJL, 2020, the two questions to be answered in this segment are (i) whether the admissibility of a confessional statement is governed by the Evidence Act or the provisions of section 18(2), (3) and (4) the ISACIL; and (ii) what will be the effect of failure of confessional statement to comply with the ISACJL? In answering the above queries, the preliminary point must be made that evidence is a matter within the exclusive legislative list12 (which is outside the legislative competence of any State in the Federation). Evidence of any form in any adjudication is primarily covered by the Evidence Act, 2011. It is submitted that the Evidence Act takes precedence over the ISACJL in matters of admissibility of evidence. Any other legislation which makes provision for issues touching on evidence must take its subsidiary position to the Evidence Act. Current judicial decisions clearly support this position and rightly too. In its 2022 decision in Taiwo v FRN,13 the Supreme Court upheld the judgment of the Court of Appeal that admissibility of a confession is not dependent on the presence of counsel or relation of the suspect at the time of making the confession and that section 17(2) of the ACJA which makes this a condition precedent cannot override the clear provision of section 29 of the Evidence Act. Therefore, relying on the decision of the Supreme Court in Taiwo v FRN (supra), the provisions of section 18(2), (3) and (4) of the ISACJL, 2020 cannot supersede the provision of section 29 of the Evidence Act. Furthermore, the question whether a voluntary confessional statement recorded under section 15(4) of the ACJA will be inadmissible on the ground that it was made in the absence of a Legal Practitioner as provided in section 17(2) of the ACJA, 2015 was submitted for adjudication in the case of Tijani v COP14 and the Court of Appeal held that the ACJA, 2015 is principally a procedural law and cannot therefore override the Evidence Act because a statement was not recorded in the presence of a Legal Practitioner or any of the persons as provided under section 17(2) of the ACJA, 2015.

11. See N.O. Okia 12. Jen 23. Pet 1 13. (2022) LPELR 14. (2022) LPELR

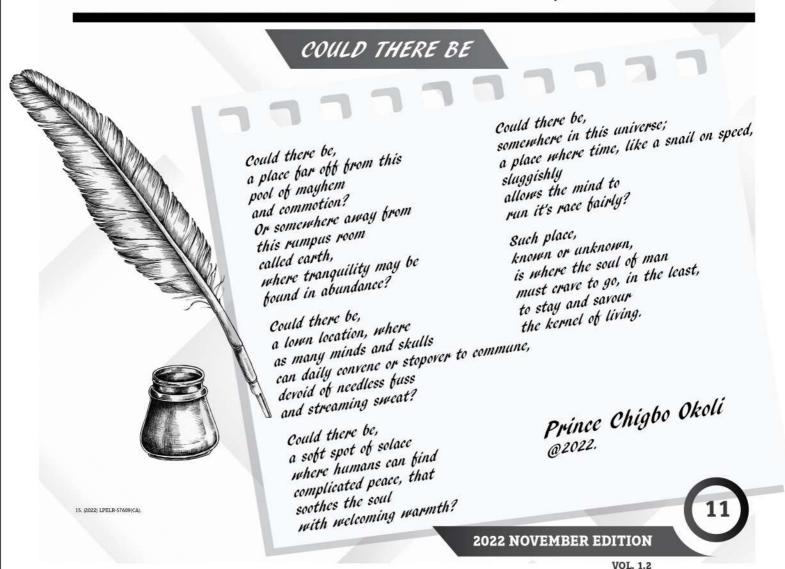
Section 2(1) ISAC[I.
 See N.O. Distanceri, "Nevel Provisions of the Imo State Administration of Criminal Justice Law, 2020", Orient Law Journal, Vol. 4, (2021) 7-1
 Item Z3, Part 1, Second Schedule of the Constitution of the Federal Republic of Nigoria, 1999 (as amended).
 2, 2022 [PERI-5-7826/SC).

The question of the effect of failure of confessional statement to comply with a State law was directly answered in Muoneke v State.¹⁵ In that case, one of the issues for determination before the Court of Appeal was whether the Learned Trial Judge was right to admit the confessional statement of the Appellant without inquiring into whether or not the alleged confessional statement was obtained in compliance with section 17(2) of the Abia State Administration of Criminal Justice Law (requiring that a confession shall only be made by a suspect in the presence of a private Legal Practitioner or any other person of his choice) and whether failure to do so would affect the admissibility of the statement. The Court of Appeal held among other things that it is the Evidence Act that covers the admissibility of the confessional statement and not any State Law. Relying, on the above authorities, it is finally submitted that failure to comply with the provisions of section 18(2), (3) and (4) of ISACJL, 2020 will not affect the admissibility of a confessional statement. The admissibility of confessional statement in Nigeria is governed by sections 28 and 29 of the Evidence Act, 2011.

6.0. Conclusion

The innovative procedures for obtaining confessional statements under the ISACJL, 2020 are commendable but regrettably, these provisions are merely advisory if not illusory as judicial decisions have clarified that the Evidence Act (not the ACJA. the ISACJL or any other State legislation) regulates admissibility of evidence including confessional statements. This is a big setback and lends credence to the compelling advocacy for urgent amendment of the Evidence Act to expressly accommodate the revolutionary procedures enacted in ISACJL as the irreducible minimum standard to be adopted in obtaining a confessional statement. Continued retention of these legal value additions that safeguard the voluntariness of confession in a State law which can never trump the Evidence Act as the principal law that regulates evidence is a complete waste of the precious time of the lawmaker.

- By Prof OBIARAERI, N.O



CLARION CALL FOR VALUES EDUCATION IN NIGERIAN SCHOOLS

By Dr. Amaechi Ezinne

Values are those fundamental qualities and traits that represents an individual's beliefs and guiding principles which form the basis of who we are.

Generally, values of people differ as a result of one's upbringing, culture, religious beliefs and many other life experiences that shape each and every human being.

Primarily, values are fundamentally taught at a young age and predominantly learnt from family, friends, the community and most importantly through education.

Therefore, teachers are saddled with the primary responsibility of inputting into pupils and students positive and worthwhile values to help build a driving force in shaping the society.

Education at all levels in Nigeria is required to explicitly articulate core shared values within its curriculum framework.

The purpose of values education in schools today is to equip the pupils and students with a foundational understanding of what is right and wrong.

However, the common universal challenge which arises with values education is the selection of what values are correct values to be taught, reinforced or not noted as a priority value. In such situations, each individual is expected to acquired the basic values which include;

CARE: The act of having love and compassion for self and others.

INTEGRITY: The need to act habitually in accordanc with principles of morals, ethical conducts and ensure consistency between words and deeds.

HONESTY AND TRUSTWORTHY: Be honest, sincere and seek the truth.

FAIR GO: Pursue and protect the common good where all people are treated fairly.

DOING YOUR BEST: Seek to accomplish something worthy, try hard and pursue excellence.

RESPECT: Treat others with consideration and regards. Always respect other people's point of view

RESPONSIBILITY: Be accountable for actions. Learn to resolve differences in constructive, non-violent and peaceful ways.

UNDERSTANDING, TOLERANCE AND INCLUSION: Be aware of others and their values. A clear understanding of diversity within a democratic society.

FEAR OF GOD: This trait is the most fundamental of all values. It is that which gives life to all other values.

Practically, a person is not expected to be at its best while exhibiting these basic values. However, it is the role of the teachers to establish to students to seek to do their best intrinsically, to be self motivated and persevere in doing so whether it be at home, school or daily activities. This way of teaching not only brings about discussion with peers but within mentors, friends and family members as it is seen as a whole school approach that can be reflected into the society. These values if positively appreciated will help to reduce the negative vices currently experienced in our present day Nigeria.

This Clarion Call needs to be universal for all people, as values are words with powerful transforming meanings that need not only to be taught but to be reflected upon our daily lives for a sustainable developed Nigeria.



GARNISHEE PROCEEDINGS AND THE JUDGMENT DEBTOR'S RIGHT TO FAIR HEARING

Garnishee proceedings has become a quick, efficient and most adopted means of enforcing money Judgments and has become the delight of judgment creditors who wish to enjoy the fruit of their judgment.

Being a sui generis action, the proceedings is mainly governed by the Sheriffs and Civil Process Act, Judgment Enforcement Rules and the relevant High Court Rules.

There appears to be a notion among some practitioners that Garnishee proceedings involves only the Garnishee and the Judgment Credit, the law guiding this kind of proceedings and judicial authorities say otherwise.

Section 83(2) of the Sheriffs and Civil Process Act makes it mandatory the service of the order nisi on the judgment debtor at least fourteen days before the hearing wherein the order nisi will be made absolute. See also Order VIII Rule 8(1) of the Judgement Enforcement Rules.

In NIGERIAN BREWERIES PLC v. DUMUJE & ANOR (2015) LPELR-25583 (CA), the Court of Appeal, per OGUNWUMIJU, JCA held as follows:

"The implication of the above is that where there is payment by the garnishee into Court, consent of the judgment debtor is necessary to pay some to the judgment creditor. Where the garnishee does not pay until the return date, the Court shall hear both the judgment creditor and the judgment debtor if the latter appears in Court before making such "order in the proceedings (including an order as to costs) as may be just."

Even in cases where the garnishee disputes liability, the Court still has a duty to hear the judgment debtor just like the judgment creditor before determining the liability of the garnishee to pay out the amount to the judgment creditor. See Order VIII Rule 8(1) of the S & CPA. I agree with all amici in this case that any decision made on relevant parties in a garnishee proceedings post Order Nisi without advertence to the provisions referred to above is per incuriam. I am of the firm view that after the service of the Order Nisi on him, the judgment debtor may convince the Court by way of affidavit to discharge the Order Nisi, for instance, where it is proved that the judgment leading to garnishee proceedings, was obtained by fraud, non-service of the origination process of the main suit or any other vitiating factor based on which the trial Court has the power to set aside its own judgment or even payment or liquidation of the judgment sum which is being sought to be realized by way of enforcement where the Court refuses to discharge the Order Nisi and make the Order Nisi Absolute, the judgment debtor, being a necessary party, can appeal as of right since the Order Absolute is regarded as a final decision of the Court. The emphasis here is the fairness of the judicial process. The right to fair hearing enshrined in \$.36 of the 1999 Constitution only connotes that a party should be given the opportunity to be heard whether or not a party's submission is accepted is entirely the Court's prerogative. The service of the Order Nisi and all accompanying processes on the judgment debtor is not a matter of justifying righteousness. In my humble but strong view, it is a mandatory provision without which any subsequent judicial action would be rendered a nullity. In my humble view, the judgment debtor who is the owner of the money in possession of the garnishee has a right to be heard if he wishes before the garnishee order is made absolute. I am also of the strong but humble view that his right to be heard should not be at large. If not a Pandora's box would be opened to enable the judgment debtor engage in all manner of activities that can abort the process and or make nonsense of the raison d'etre of the provisions and rules of Court in garnishee proceedings enacted for the express purpose of oiling the wheels of execution of liquidated money judgment. Therefore, it is my own humble conclusion that a judgment debtor is free to challenge the Order Nisi before the Court that made the order..." In this case the court invited seasoned legal practitioners as amicus curiae to assist the court in resolving the issues bordering on the right of the judgment debtor in garnishee proceedings, whether garnishee proceedings can continue where there is a Motion for Stay of Execution and other sundry issues.

This was also the decision of the Court of Appeal in STANBIC IBTC BANK PLC v. LONG TERM GLOBAL CAPITAL LTD & ORS (Unreported APPEAL NO. CA/L/245A/2011) where the Court held:

"Section 83(2) of the Sheriffs and Civil Process Act makes the service of the order nisi on the judgment debtor at least fourteen days before the hearing wherein the order nisi will be made absolute mandatory. DELTA STATE GOVT v. KAY QUE INVESTMENT LTD & ANOR (2018) LPELR-45545(CA).

What the above simply means is that the Judgment debtor's right to fair hearing after the grant of Garnishee order nisi is paramount and any breach of same renders the entire proceedings a nullity.

However, where a judgment debtor was served with the order nisi but fails to participate in the proceedings, same will not invalidate the proceedings as right to fair hearing does not mean that a party must be heard. A party who fails to utilise the opportunity afforded him cannot be heard to complain of breach of fair hearing as he will be seen to have waived the right. See Eze V. F.R.N (2017) LPELR-42097(SC).

It is my humble view that the role of the judgment debtor in garnishee proceedings should only be nominal, since it is the Garnishee that has the primary duty of showing cause why the money in its custody standing to the credit of the judgment debtor should not be paid, otherwise any attempt to push that right to the extreme will serve as a clog in the wheel of progress of the judgement creditor as the judgement debtor may apply tactics to truncate the process.



UPDATE AND MEMBERS SUPPORT SYSTEM

Distinguished Colleagues,

Recall that on October 27, 2022, the NBA President, Mr. Yakubu Chonoko Maikyau, OON, SAN announced the renewal of the LawPavilion subscription for eligible young lawyers.

Activation of the web-based legal research tool (Primsol) has since commenced and LawPavilion has at today completed sending activation mails to all eligible young lawyers.

However, we recognise that some have been unable to activate their package while others have not received the activation mails from LawPavilion. We are committed to resolving all these issues, while also ensuring that we have an effective feedback process for all complaints.

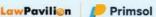
Therefore, the NBA in conjunction with LawPavilion shall be hosting hand holding sessions to guide our eligible members through the activation process. We encourage our members to attend these sessions.

Also, we have set up a support team and have assigned account managers for each NBA Branch to receive and resolve all complaints. You can find the account manager of your Branch in the attached flyer(s).

Thank you and have a good weekend.

AKOREDE HABEEB LAWAL





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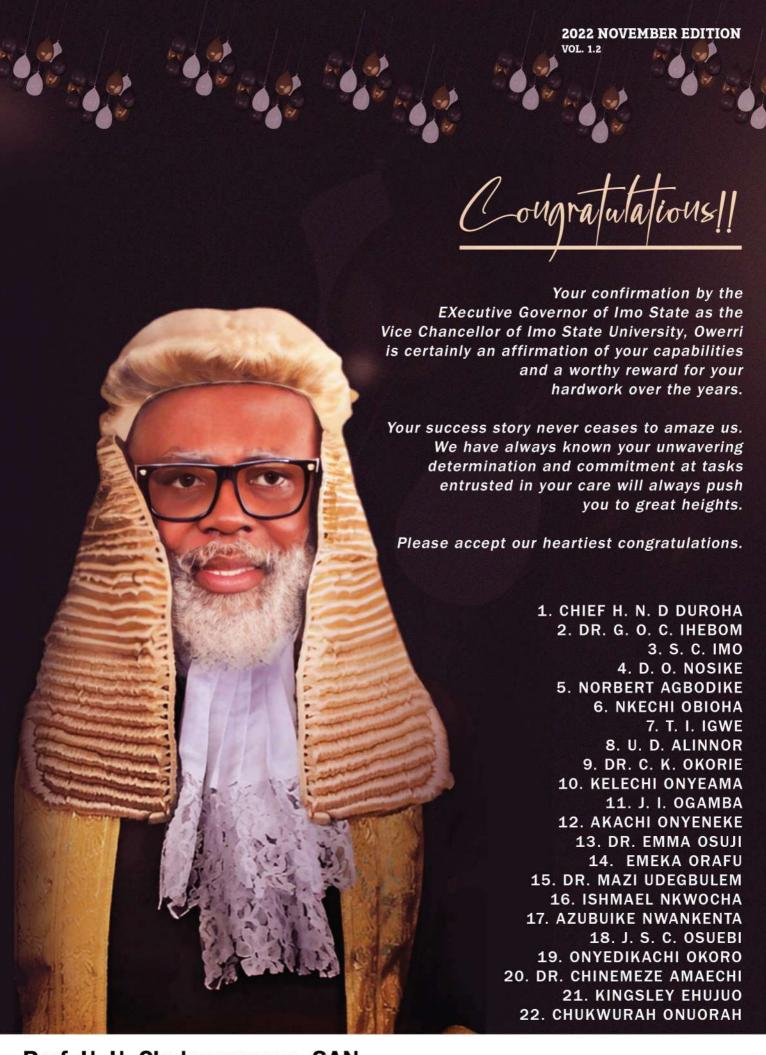
MBANOETITI Emmanuel 07032983265 **OWERRI** Jennifer 09028140318

Or send an email to:

nbasupport@lawpavilion.com

Call anytime between 10am to 6pm weekdays and 1pm to 5pm weekends





Prof. U. U. Chukwumaeze, SAN Vice Chancellor Imo State University, Owerri