

HERBERT HART'S SECONDARY RULES AND THE NIGERIAN ELECTORAL PROCESS: A CRITIQUE

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Abstract

The Nigerian electoral process which is a symbol of democratic governance is perpetually under attack by controversies, anomalies, and charges of malpractice. This work critiques the procedural and substantive shortfalls of the electoral process of Nigeria using H. L. A. Hart's theory of secondary rules in his *The Concept of Law*. Hart's theory gives us a model of jurisprudence for countering the structural weaknesses and uncertainty in law that can undermine the credibility of elections, namely rules of recognition, change, and adjudication. This paper holds that in as much as the 1999 Constitution and the Electoral Act provide a foundation for legal authority and legitimacy in elections, deficiencies in the effective application of secondary rules contribute to systemic failure. For example, contradictory court rulings and biased enforcement of the law tend to undermine the rule of recognition, which undermines the legitimacy of election results. Likewise, ineffective mechanisms of dispute settlement in elections result in tardy justice, which, in turn, nourishes political instability. Also, archaic conventions of elections are perpetuated by legislative gridlock and opposition to reforms, which hamper norms of change. The effect of these shortcomings on the public confidence in democratic institutions for political accountability is also addressed in the paper. This work applies analytic method of philosophy and case law to show how weak secondary rules raise Nigeria's difficulties when it comes to free, fair, and credible elections. This work argues that strengthening institutionalized frameworks and promoting a political culture that is committed to legal integrity and procedural fairness can ensure the development of Nigerian electoral jurisprudence. In addition, the sustainability of democracy in Nigeria rests on the creation of a robust electoral jurisprudence that promotes constitutional stability, political accountability, and public trust in the democratic system.

Keywords: Rule of Law, Electoral Jurisprudence, Secondary Rules, Primary Rules, Nigerian Electoral Process

Introduction

One of the cornerstones of democracy is the process of election, which reflects the principles of legitimacy, representation, and accountability. Elections continue to be a main instrument for structuring relations between the state and its citizens in Nigeria, a country characterized by political dynamism, cultural diversity, and centuries-old tradition of struggle for governance. But the root defects of the nation's electoral system are disputed election results, unclear law, inconsistent judicial decisions, and mass popular suspicions as a whole. All of these risks require an interdisciplinary analytical approach to take into account the interactive dynamic between politics, law, and democratic ideals. A fascinating perspective on this issue can perhaps be gleaned from Hart's jurisprudential theory of secondary rules. There are two types of rules in Hart's theory of law: primary rules of regulation of conduct

and secondary rules of regulation of the making, altering, and application of primary rules.

Secondary rules as a source to account for functioning and development of legal systems set a foundation to this end. These recognition rules, change rules, and enforcement rules are labeled according to their specific activities. The Nigerian electoral system, institutional setup, legal order, and susceptibility to systemic flaws are all examined in this paper using Hart's model. The rule of recognition is regulated by the 1999 Constitution and the Electoral Act, and it sets out the terms on which electoral law can be said to be valid. However, in the interpretation of the Nigerian constitutional sections like 134 and 285 there is a clash between judicial authority and political legitimacy. In the same vein, the rule of change emphasizes the dynamic development of electoral acts like the Electoral Act 2022 and technological advancements like the Bimodal Voter Accreditation System (BVAS). These changes, while promising, are not immune to reversals since implementation flaws and political elites' opposition strive to denigrate them.

Lastly, adjudication law plays a role in the dispute resolution processes during and after elections, where the principal players are appeal courts and election tribunals. The legitimacy of these institutions is raised by questions regarding political neutrality, procedural irregularities, and judicial independence. In addition, this paper theoretically contributes to the literature of election law by illustrating how Hart's secondary principles apply to peculiar legal challenges, showing how important robust institutions that promote justice, accountability, and transparency are and the value of legal systems in the mediation of democratic disagreements and aspirations. The Nigerian situation educates experts and academics about how law and democracy interact within the transitional context. The study offers practical recommendations on how institutions of law can be strengthened, electoral justice can be guaranteed, and democratic culture enriched in Nigeria and the rest of the world using Hart's theory of jurisprudence to examine the election process in the country.

Nigeria's Election System: Growth and Disputes

Elections are the cornerstone of democracy as they give power to the people to choose their leaders and impact government. Nigeria's election process has however been plagued by deep-seated and structural problems that erode popular trust. In the 1923 elections under the Clifford Constitution, which only allowed literate male in Lagos and Calabar elite, were the beginning of colonial Nigeria's electoral history (Nwabueze, 1993, p. 93). Moving forward, Richards (1946), Macpherson (1951), and Lyttleton (1954) were only some of the constitutions that broadened representation and federalism within the regional setup. However, the first nationwide elections, the 1959 general elections, were marred with manipulation and racism (Ediagbonya et al., 2023, p.30). This highlights the fact that election instability was precipitated by Nigeria's transition to military rule following independence. For instance, the 1966 coup d'état was a consequence of malpractice that incapacitated the First Republic (1963–1966) (Dudley, 1973, p. 45). Federal Electoral Commission (FEDECO) and other reforms were established during the 1979 Constitution of the Second Republic (1979–1983), but election rigging continued and led to military intervention. Through the establishment of the Independent National Electoral Commission (INEC) and the implementation of biometric voter registration and other reforms, the Fourth Republic (1999–present) reinstated democracy, though institutional corruption still exists (Tunmibi & Wole, 2023, p. 2).

In accordance with the 1999 Constitution and Electoral Act, Nigeria's legal system is a multi-party democracy (Electoral Act, 2022; Constitution of the Federal Republic of Nigeria,

1999). The Constitution further provides for the powers of the different organs of government and the election process: Section 14(2)(a) provides for free and fair elections form the foundation of governmental power. State and National Assembly elections are held under Sections 77 and 117. Sections 153–158 provide details of the function and duty of INEC regarding election monitoring, while Section 131 explains rules of elections regarding presidential and vice-presidential elections. The first-past-the-post system is used during elections for State Assembly, Governorship, and Legislature. Even though they are fundamental to citizens' engagement in government, local council elections are not well attended and are marred by irregularities (Omotola, 2010, p. 537). Voter registration process, party involvement, management of the election, and dispute resolution are provided for in the Electoral Act. It has been modified to face new challenges and meet international requirements: Section 4 gives authority to INEC to conduct and arrange elections, and Section 1(1) is formulated to fit every election in Nigeria. The Electoral Act and the Constitution together uphold democratic principles by making elections free, fair, and a manifestation of the popular will. Notwithstanding the constitutional amendment and Electoral Acts provision for free, fair, and credible elections, Nigeria's electoral system remains encumbered by several challenges which Harts Secondary Rules should be applied to.

Hart's Secondary Rules: An Application to the Nigerian Election System

Hart's legal positivism is a response to John Austin's legal views. Austin was a legal theorist, in his seminal work, *The Province of Jurisprudence Determined*, defines law as "a command issued by a sovereign, backed by sanctions" (John Murray, 1832: 18). In his view, law is essentially a command issued from a political superior to political inferior, enforced by penalties for non-compliance. In a detour, Hart was ill-at-ease with Austin's definition of law as a command or imperative. However, due to its inadequacies, such as the incapacity to explain constitutional norms prompted Hart's modification of Austin's idea of law as a command. Hart's rule-based model replaced Austin's rigid framework with a dual system: primary rules imposing duties and secondary rules enabling legal evolution. Hence, Hart's introduction of the secondary rules redefines legal validity beyond mere coercion; thus, the transition makes the legal social structure become more robust.

Hart defines law as a system of primary and secondary rules. According to him, in *The Concept of Law* (1961), primary rules are obligatory rules and they regulate all aspects of human behaviors directly. For instance, do not kill, do not steal, do not drive left hand side of the road, et cetera; and they exist in primitive legal systems without a centralized authority but are necessary for any legal order (91-99). Notwithstanding, Hart argues that primary rules were laden with difficulties as they are of pre-legal. Hence, they create the problems of uncertainty, inefficiency and static in nature. Therefore, he goes on to provide the remediation, by supplementing the primary rules of obligation with the secondary rules. His introduction of the secondary rules makes the legal social structure become more robust. The secondary rules govern the creation, modification and application of primary rules. They are called secondary rules because they operate on primary rules, rather than directly on human behaviour. Hart identified three: rule of recognition is like the "Master Key" that validates all other laws. Equally, it is as the "boss rule" in a legal system, that decides which rules count as real laws; rule of Change is like the "update button" for laws, outlines the process for the modification of laws within a legal system, enabling laws to stay relevant and responsive to societal needs and values, and rule of Adjudication checks the inefficiency that

burdens the primary rules of obligation and does not impose duties but confers judicial powers (94-99).

Therefore, Hart's theory of jurisprudence, more so his distinction between primary and secondary rules, is an ideal framework to the study of the Nigerian electoral process. Secondary rules provide a method for determination, application, and change of primary rules, while primary rules impose legal obligations and regulate behavior (Hart, 1994, p. 79). The Nigerian Electoral Act and the Constitution that offer for electioneering activity, procedure for the resolution of disputes, and voter rights constitute the key regulations that govern the electoral process in Nigeria. Section 14(2)(a) of the Constitution, for example, offers a guarantee of the right to vote, while Sections 77–131 offer for the mode of electing public officers. Hart goes on to state that there are secondary rules by which primary rules must be made valid and enforceable. The rule of recognition is one of the most fundamental secondary rules to pronounce the validity of legal norms in a system (Hart, 1994, p. 100). The judiciary and the Independent National Electoral Commission (INEC) do so in Nigeria.

Electoral tribunals and appeal courts dispose of election conflicts and legitimize election results, whereas the electoral process is carried out by INEC and establishes that all legal conditions have been met. The effectiveness of Nigeria's election process depends upon how these statutes interact. Problematic situations remain despite this design. Application of secondary rules is often derailed by political intervention and institutional fragility. Courts' rulings on matters related to elections are more inclined to show traces of political intervention rather than keen deference to legal norms, and the independence of INEC has been undermined. Hart observes that legal system stability depends on the proper functioning of its secondary rules and that all these concerns show how susceptible secondary rules are in Nigeria's electoral process (Hart, 1994, p.116). In order to strengthen democratic governance and election legitimacy, the foundational weaknesses need to be addressed.

The Judiciary's Role in Election Disputes

The independence and efficiency of the Judiciary are so much important for democratic stability. The judiciary safeguards electoral justice by resolving election disputes, interprets electoral laws, validates or annuls results, oversees electoral commissions, protects voter rights, prosecutes electoral offenses and prevents post-elections violence. By the application and interpretation of the election rules, the court usually upholds the integrity of the electoral process and the rule of law. Through Hart's theory of internal point of view, jurisprudence alludes to the function performed by judges in determining and applying the law as commanded by the norm of recognition (Hart, 1994, p. 102). In Nigeria, the judiciary such as the Election Petition courts and the Courts of Appeal are obligated to resolve election dispute, including complaints of voter's fraud, process failure, and electoral misconduct. Where electoral laws have been breached, their rulings confer legal remedies and validate the authenticity of election results. However, the concerns of judicial impartiality, are still being faced, especially in controversial cases where political interference in judicial verdicts is alleged (Omotola, J. 2010, p. 45). A case study in point of court involvement in electoral petitions is the 2019 presidential election in Nigeria. Despite several instances of alleged electoral corruption, the Presidential Petition Tribunal affirmed President Muhammadu Buhari's victory (Akpan, S. 2019, p. 78). The decision has been condemned. Others commended it for maintaining democratic principles. Hart submits that in order to gain legitimacy, a court must respect the norm of recognition (constitutions,

statutes, judicial precedents); Public confidence is undermined in the judiciary and electoral process if the judgments look politically motivated (Hart, 1994, p. 116).

Beyond the judiciary, the executive and legislative arms of government exert huge influence on the electoral processes. They do influence elections through law interpretation and resolution of disputes (Judiciary), oversee electoral administration (Executive), and legislation of laws and provides oversights (Legislature). The theory of Hart illuminates the interaction between legal and political architectures. In Nigeria, the legislature formulates electoral bills, which chart the course for elections, though government does retain a command over elections with appointments to Independent National Electoral Commission (INEC). Since executive control over INEC appointments have implications for electoral independence and legitimacy, this phenomenon is undesirable since it can be manipulated (Omotola, J. 2010, p. 63). Political aspects of electoral management are also exemplified by legislative endorsement of electoral legislation, where party influences may drive legislative changes rather than democratic principles. In order for Nigeria's electoral system to function efficiently, primary and secondary rules must be exercised equally. Legal positivism by Hart means that sound secondary rules and an unbiased court need to exist before a legal framework for sanction and enforcement of election norms may sanction and implement them (Hart, 1994, p. 132). The gap between institutional practice and doctrine has to be filled to achieve electoral legitimacy, making it firm enough for strengthening democratic governance.

Executive and Legislative Impact on Election Results

Of utmost importance in the electoral process in Nigeria is the position of the legislature and executive in deciding the direction of an election. By applying Hart's theory of law, the way through which the primary and secondary regulations influence the process of an election is better grasped. The integrity of the election relies most importantly on the legislature and executive, especially when the selection of INEC commissioners and the formulation of laws pertaining to elections come into play. In the case of executive power, the provisions of Section 153 of the Constitution, the executive and the President do have the ability to nominate INEC members. But this is normally done in a politically motivated way, which is a fear that there might be partisan appointments to favour the ruling party. Hart's theory would suggest that such political interference undermines the legitimacy of the electoral process since the application of electoral rules must be neutral and in accordance with the rule of recognition (Hart, 1994, p. 103).

As regards legislative power, the legislature, or the National Assembly, does have some control over the electoral process because it enacts the Electoral Act, but the enactment of electoral legislations is likely to be in line with political considerations. For instance, in 2018, the *Vanguard News* reports, "many politicians were concerned about the potential outcomes of free and fair elections facilitated by the amendments" (*Vanguard News*). Correspondingly, "the reluctance of lawmakers to pass the Electoral Bill was largely influenced by fears that its provisions might adversely affect their re-election" (*The Guardian Nigerian*). Legislative manipulation of the system undermines the legitimacy of the system in which election laws are manipulated for political purposes, according to Hart's secondary rule theory (Hart, 1994, p. 114).

Election Legitimacy and Hart's Theory

In Hart, both primary and secondary rules need to be accepted universally in order for the electoral system to be legitimate. This is because it has a bearing on impartiality in ensuring fairness and transparency in the conduct of elections, political interference that undermines impartiality undermines the legitimacy of the electoral system (Hart, 1994, p. 120). In addition, Hart's theory is concerned with making sure that the electoral process preserves the integrity of the primary and secondary rules. Nigerian elections would be valid if there are no political conspiracies and the laws are applied equally and impartially, guaranteeing transparency and accountability.

The Electoral Process's Rule of Recognition and Public Trust

From Hart's legal theory, the recognition rule is crucial in identifying other legal standards in a system. Public confidence in the court and the INEC, among others, upholds the legitimacy of Nigeria's electoral process. As long as the election is seen as free and fair and the results are their true choice, the people will remain convinced of it, thus making the rule of recognition legitimate. But allegations of electoral corruption, judicial partiality, and political manipulation can destroy the people's faith and damage the legitimacy of the democratic process (Hart, 1994, p. 121).

Hart would be against political manipulation of secondary rules, which regulate the use of primary election processes. But where there is political interference, it is most likely in the form of politicization of election law that undermines judges' independence in Nigeria. Neutrality in the regulation of elections has been tainted by politicized appointment of courts and political leaders' breach of the election Act. Politically motivated judgments taint the electoral process by eroding its integrity, as seen in the 2019 election petitions (Akpan, S. 2019, p. 56; Omotola, J.S. 2010, p.78). Hart posits that for a legal system to thrive, its rules must be impartially and equitably applied, without politics (Hart, 1994, p. 115).

Impact of Campaign Regulations, Political Parties and Institutional Challenges to Electoral Administration

The political parties in Nigeria play an enormous role in the electoral process despite their liking for loopholes in the law under which they operate to go after illegal activities such as vote buying and election violence. The party processes are regulated under the Electoral Act (2010, Amendments), but parties like to brush aside such laws for individual benefits. Hart highlights the manner in which society tolerates the law. As Hart (1994, p. 119) holds, political parties that breach election regulations erode the confidence of the public in the system and, by implication, the legitimacy of the electoral system and political parties.

Hart's secondary rules theory is quite significant for institutions like INEC, which conducts elections. For the rule of recognition to apply, INEC must efficiently administer electoral law. Malfunctioning of BVAS during the 2023 elections is a proof of how operational inefficiencies, untrained personnel, and resource availability can lead to skepticism about INEC's capability. The entire process of the elections can be questioned for its legitimacy if INEC does not carry out its functions professionally and openly (Eneji, 2019, p.45). According to Hart, the legitimacy of a legal order is based on members of institutions upholding its standards repeatedly (Hart, 1994, p. 123).

The Role of Electoral Reforms in Strengthening Legitimacy

Hart's argument is that reform cannot be avoided in its bid to overcome the strife Nigeria's electoral system is confronted with. The intention of the amendment should be to solidify

the institutional strength of INEC, the accountability of the judiciary, as well as the independence of electoral institutions. These can be made better by further reforms like electronic voting, increased election monitoring, and increased transparency in campaign finance.

Moreover, increasing judicial autonomy would deepen the rule of law and ensure the dignity of election results, particularly in election petitions (Hart, 1994, p.118). Assuming other factors are held constant, Hart's theory of law is an appropriate model of the interaction among institutional action, legal rules, and political authority in the Nigerian electoral process. Primary and secondary rules need to be enforced equally and uniformly so that the process will work accordingly. Nigeria can legitimate its electoral process and guarantee the result of elections to correspond to the people's desires by eliminating political interference and developing institutional capacity.

Issues with the Nigerian Electoral Process

Executive excesses, electoral vices, and inconsistencies in the law are only a few of the critical issues that undermine the integrity of Nigeria's electoral system. Arbitrary applications of the law and inadequate resources for election institutions, such as the Independent National Electoral Commission (INEC), tasked with conducting elections, are some illustrations of legal and institutional anomalies. These issues still linger despite attempts at reform, such as the 2018 election Act Amendment, that incapacitate the application of election law (Ogunbayo, 2023, pp.74-89). Some other habits of electoral malpractices which erode the rule of law and plant doubt include vote-buying and harassment of voters.

Inability to prosecute criminals exacerbates these challenges (Akinwale, 2020, pp. 101-118). The process is also tainted as unfair by executive misuses, including politically driven INEC appointments and the abuse of public funds to support or discredit candidates (Abubakar, A. 2020, pp.35-47; Duru, J. 2019, pp. 56-72). These issues prevent Nigerian elections from being legitimate, hence the necessity for radical reforms to ensure the independence of the judiciary and electoral institutions. Secondly, some problems like election violence, poor observation, lack of civic education, and the involvement of the army are issues slowing Nigeria's democratization process. They undermine the rule of law and the conduct of elections.

There is a common occurrence of violence like ballot snatchings and vote rigging as well as the intimidation of electors in elections in Nigeria, especially in volatile areas. Integrity of the polls is undermined and electors live in fear of violence (Nwolise, O. 2010, pp. 103-118). Apart from INEC and international organizations, electoral observation is hampered by political interference and insufficient funding, which further degrades process transparency (EU EOM, 2019). In exchange, citizens were not informed about their rights and how to vote because of a shortage of civic education, which dissuaded well-informed voting and rendered electoral legislation less efficient (INEC, 2020). Nevertheless, there have been reports of military intervention in the elections that have evoked vote-tampering and intimidation, especially in the 2015 election (Annan, 2015). Nigeria should end such occurrences by developing more robust institutions, improving civic education, and reforming legislatures in a bid to restore confidence.

Prospects of Hart's Theory-Based Reform for the Nigerian Elections

According to Hart's theory of law, the Nigerian voting process needs to be changed by using open and rational legal principles. Strengthening the rule of recognition, enhancing judicial independence, and closing gaps in election laws are a few of the measures. For the consolidation of the Rule of Recognition, Hart emphasizes universal adherence to the legal norms. Uniform application of Nigerian electoral laws is required to strengthen INEC's authority and reduce the politicians' role. Judicial autonomy is essential to guarantee impartiality in the adjudication of election complaints. The courts must be safeguarded from political interference through reforms. Hart favours reforming the law. Amending Nigerian electoral regulations to include provisions for party finance, technological innovation, and election result publication is essential. In Hart's thesis, the legal rules of the election mechanism must be shared. Trust and legitimacy will be regained through reforms enhancing legislative clarity, judicial independence, and the rule of law.

Conclusion

Hart's legal positivism is an explanatory framework which this work has clearly shown how his legal rules can be practically and consistently applied in a coherently manner to the Nigerian electoral process. His rule of recognition places immense emphasis on widely adhered and enforced standards in order to ensure legitimacy and discourage rigging during elections. An open and transparent electoral system preserves the confidence of the people and strengthens institutional integrity in democratic governance, especially in Nigeria. Ensuring democratic legitimacy and preventing manipulation of the system requires electoral law to be stated precisely, enacted impartially, and globally recognized. With the use of Hart's paradigm of law, electoral institutions can promote accountability, reduce conflict, and provide a stable democracy.

References

- Abubakar, A. (2020). "Executive Overreach in Nigeria's Electoral Process." *Nigerian Political Review*, Vol. 12, No.4.
- Akinwale, A. (2020). "Judicial Bias in Nigerian Elections: The 2019 Presidential Election." *Journal of African Politics*, Vol. 28, No.4.
- Akpan, S. *Judicial Influence in Nigerian Electoral Politics*: Ibadan: Ibadan University Press, 2019. Akpan, S. *Judicial Influence in Nigerian Electoral Politics*: Ibadan: Ibadan University Press.
- Akpan S. (2019). "Electoral Integrity and the Judiciary in Nigeria." *Journal of Nigerian Politics*, Vol. 45, No. 2, 2019.
- Annan, Kofi. (2015). The E11 In Practice: The 2015 Nigerian Presidential Elections." <https://www.kofiannanfoundation.org/news/the-eii-in-practice-the-2015-nigerian-presidential-elections/> Retrieved 25th January, 2025.
- Austin, John (1883). *The Province of Jurisprudence Determined*. London: John Murray.
- Dudley, B. J. (1973). *Instability and Political Order: Politics and Crisis in Nigeria*. Ibadan: University of Ibadan Press.
- Duru, J. (2019). "Voter Intimidation and Military Deployment in Nigeria's 2019 Elections." *African Politics and Governance Journal*, Vol. 6, No. 2.
- Ediagbonya, Michael., Olumide, Ogunrotimi., Ukhurebor, Aghahiusi (2023). "Election Rigging and Violence in Nigeria in Historical Perspective: A Case Study of 1959, 1964, 1965 and

- 1983 elections" (2023). *International Journal Of Multidisciplinary Research And Analysis*. Vol. 06, No. 1. Pp. 28-36
- EU EOM. (2025). "Nigeria 2019 Election Observations." *European Union Election Observation Mission*. <https://www.ecoi.net/en/document/2020744.html> Retrieved 15th January, 2025
- Hart, H. L. A. (1994). *The Concept of Law*. 2nd ed. Oxford: Oxford University Press.
- Hart, H. L. A. (2012). *The Concept of Law*. 3rd ed., Oxford: Oxford University Press.
- INEC. (2025). "The Role of Voter Education in Nigerian Elections." *Independent National Electoral Commission*. <https://inecnigeria.org/news-all/voter-education-armed-forces-to-support-inec/> Retrieved 15th January, 2025.
- Nwabueze, B. O. (1993). *Military Rule and Social Justice in Nigeria*. Ibadan: Spectrum.
- Nwolise, O. (2010). "The Impact of Electoral Violence on Nigerian Democracy". *African Political Review*, Vol. 10, No. 2.
- Ogunbayo, R. (2023). "The 2023 Nigerian Elections: Technological Challenges and Electoral Integrity." *International Journal of Nigerian Studies*, Vol. 11, No. 1.
- Omotola, J. S. (2010). Elections and Democratic Transition in Nigeria under Fourth Republic. *African Affairs*, Vol.109 No. 437.
- Omotola, J. (2010). Judicial Bias in the 2019 Nigerian Elections. "*African Law Review*, Vol. 10.3.
- Omotola, J. (2019). "Electoral Malpractices and the 2019 Nigerian Elections." *African Political Science Review*, Vol. 22, No.11.
- Tunmibi, Sunday & Olatokun, Wole (2023). Security and preservation of election data in Nigeria in the fourth industrial revolution 47(3- 4), pp. 1-7.
- The 1999 Constitution of the Federal Republic of Nigeria (Amended).
- The 2022 Electoral Act of Nigeria..
- Vanguard News. *Who Is Afraid of Amended Electoral Act?* December 16, 2018. www.vanguardngr.com/2018/12. Accessed March 24, 2025.
- The Guardian Nigeria. *Dodgy Politics of Electoral Act Amendment*. December 10, 2018. www.guardian.ng/politics. Accessed March 24, 2025.