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Plea Bargaining: A Recreation of George Orwell's *Animal Farm* in Nigeria

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Abstract

Animal Farm is an allegorical novel by George Orwell in which he depicted social injustice precipitated by the insincerity of leadership and the betrayal of the people by their leaders which has made the novel relevant as the experience depicted therein “seamlessly steps into the realities of everyday life” (Achebe 2012) in contemporary societies all over the world. This paper presents a comparative analysis of the *Animal Farm* experience and the Nigerian experience hinged on plea bargaining. The Nigerian citizens advocated for democracy, fought for and won the entrenchment of democracy and the political leaders turned themselves into pigs of who are of special breed. The political leaders just like the pigs in *Animal Farm* are entitled to the best of everything while the others toil and labour for them to enjoy. In addition, they are exonerated of embezzlement of public fund through plea

bargaining while an ordinary citizen is jailed for street trading. The argument in this paper is that economic and violent crimes have the same impact on the society and so should be treated the same way. If every Nigerian who is accused of or even guilty of any crime cannot make use of plea bargaining then it should be expunged from the judicial system of the country while stiffer penalties be meted out to economic and financial criminals. The conclusion is that if the practice of plea bargaining is not checked, it could erode the credibility of the country's justice system.

Introduction

The idea for this paper was mooted at Ikoyi Prison, Lagos, Nigeria during one of the visits by the Knights/Ladies of St Mulumba, Lekki Sub Council. In their Free Legal Services Programme, working for the release of some of the inmates, it was discovered that some of the inmates, mostly youths, are detained without trial or convicted for trivial offenses like “Street trading, Affray, Alleged Assault, Alleged Stealing, Allegedly Stealing N86,000 belonging to no known complainant, Assault, Attempt to escape from Lawful custody, Attempted murder, Attempting to commit felony and many other offences” (Offordile 2011: 10). These Nigerians languish in prison some without trial for many years and with the intervention of the Knights, 474 prison inmates were released as at August 2012. This study appraises the issue of social justice through a comparative analysis of the case of an ex inspector general of police and three ex governors and the case of these prisoners on one hand and the activities of the pigs in *Animal Farm* and other animals on the other hand. The offences and punishment of some of the prisoners were nothing compared to the offences of the public office holders and the conclusion is that there is no justice here. “All animals are equal but some animals are more equal than the others” (83) has become the unwritten maxim in Nigeria through plea bargaining.

Nigerians condemned military rule as dictatorial and applauded democratic governance as the only way to egalitarian society in the nation and after three republics of democracy in Nigeria yet the citizens have not fared better. Just like in *Animal Farm*, where the Animals chase Mr. Jones away, Nigerians drove the Military rulers who like Mr. Jones were seen as tyrants and dictators. The politicians like Napoleon took over governance and became worse oppressors than the Military leaders and the gulf of inequality and social injustice in the country widens. This paper presents the detrimental

effect of plea bargaining on political and sustainable development in the country.

Animal Farm

George Orwell's *Animal Farm* is listed as the Modern Library's 100 Best Novels- the best English-language novels of the 20th century (Wikipedia on-line Dictionary). This attests to the popularity of the novel and its relevance in the contemporary experience despite the fact that it was published in 1945. "People from different parts of the world respond to the same story ...[because] to them it is about their own history and their own experience" (Bacon quoted in Achebe 2012: 39). It reflects the atmosphere in many countries of the world especially in Africa and Nigeria whose major problem has been identified as leadership. *Animal Farm* is a popular text Nigerian in secondary schools which reflects not only the corruption of the leaders but also how wickedness, ignorance, greed and selfishness destroy the possibility of an egalitarian society. It also presents how nepotism and indifference to the people's problems encourage despotism.

In the novel, the old boar, on the Manor Farm, Old Major, calls the animals on the farm for a meeting, and highlights their oppression and subjugation by human beings he refers to as parasites, who feed fat on the animals. He sensitizes them on their deplorable condition of existence and the need for a revolution by teaching them a revolutionary song, "Beast of England". He dies later, and two young pigs, Snowball and Napoleon, assume leadership, lead the animals in a revolution that overthrows the drunken and irresponsible Mr. Jones, the owner of the farm and Manor Farm is renamed Animal Farm. They write their seven commandments on the wall of a barn giving prominence to the seventh, "All animals are equal" (15) and in the spirit of the revolution, the indefatigable workhorse, Boxer, adopts the maxim, "I will work harder".

Food becomes plentiful and there seems to be an element of tranquility but within a short time, the pigs elevate themselves to positions of leadership and set aside special food items for themselves while Napoleon trains some puppies from the farm dogs secretly. In the "Battle of the Cowshed", Mr. Jones's attempt to retake the farm eludes him as the animals defeat him. Unfortunately, the two pigs, Napoleon and Snowball struggle for leadership, Napoleon wins and chases Snowball away with the dogs he trained secretly (33). Napoleon assumes full leadership, uses the dogs as bodyguards to

blackmail, terrorize or exterminate his perceived opponents and institutes a committee of pigs to run the farm (34) with a young pig, Squealer, as his mouthpiece. Ironically, the animals work harder with the promise of a brighter future but starve and grow thinner instead while the pigs and dogs become more comfortable and fatter because all rations are reduced except those of the pigs and dogs (69). Squealer rewrites the history of the farm in which he presents Snowball as villain and Napoleon a hero and Boxer takes up a second maxim: “Napoleon is always right”. Meanwhile, Napoleon emasculate opposition by killing all perceived opponents, accusing them of conniving with Snowball to sabotage the activities of the Animal Farm (51-54).

Life becomes more difficult for the animals as the Committee of Pigs imposes stiffer measures for the animals while reserving privileges for the pigs. For instance, “apples were collected and brought to the harness-room for the use of the pigs” and when the other animals murmured Squealer explains that that the pigs dislike apples but are constrained to eat them to preserve their health. He concludes “We pigs are brain workers... it is for your sake that we drink that milk and eat those apples” (22). Other delicacies like sugar, beer and eventually whisky are reserved for the pigs; each pig gets a pint of beer daily, Napoleon gets a gallon (71); Pigs get up an hour later than others (43). A school is established for the young pigs who “took exercise in the garden, and were discouraged from playing with other young animals. It became a rule that when “a pig and any other animal meet on the path, the other animals must step aside for the pigs” (70). Eventually the pigs move into the farm house that hitherto housed Mr. Jones and his family and stated enjoying all human privileges like sleeping on bed and eating meals in human fashion (42). Squealer justifies every Napoleon’s actions and the commandment is modified to suit their purpose. For instance, “No animal shall sleep in beds” becomes “No animal shall sleep in beds with sheets” ; “No animal shall drink alcohol” is changed to “No animal shall drink alcohol to excess”. The original anthem is replaced by another one that glorifies Napoleon, who gradually adopts the lifestyle of man. Other animals, groan under the burden of hardship, cold, starving, and overworked, but dare not complain openly for fear. Meanwhile they are reminded constantly that they are better off than when they were under Mr. Jones. Gradually, the pigs walk, act and dress like human beings and the Seven Commandments are reduced to a single phrase: “All animals are equal, but some animals are more equal

than others.(83)” Napoleon starts fraternizing with humans and reverts the name to Manor Farm. The animals could not tell the difference between Napoleon and Mr. Pilkington when both of the engage in an argument during a poker match.

Recreating Animal Farm in Nigeria

The overthrow of Mr. Jones and Napoleon’s take-over is akin to the rejection of Military rule and enthronement of democracy in Nigeria. Seven Commandments in *Animal Farm* like the Nigerian constitution are laws designed to keep order, unite the people and prevent the politicians from following the Military’ dictatorial tendencies. Democracy in Nigeria is expected to provide better living conditions for the citizens and help them forget the evils of “Military dictatorship”. Like in *Animal Farm* Nigerians cannot tell the difference between the military and civilian leadership. Unfortunately, the uniform in whatever guise has continued to be an instrument of brutalism and oppression as the “democratically elected” governors and local government chairmen and like Napoleon’s dogs, use men in uniform to extort money, terrorize and annihilate defenseless citizens. The Military rulers like Mr, Jones merely changed garbs with the politicians and Napoleon respectively but is worse in Nigerian the Military, now in civilian attire are still at the helm of affairs.

Nigerian leaders and their aids, like Napoleon and his pigs, are corrupt and the Minister of Information like Squealer is paid to launder their images and lie to the public. Other animals step aside for the pigs to pass just like ordinary Nigerians step aside for the politicians to pass with the sirens assaulting the ear drums of all. They invoke laws like plea bargaining to evade conviction while millions of ordinary Nigerians languish in jails. This is evident in the cases of poor men/women who languish in jail for minor offences like assault, stealing, conduct likely to cause breach of peace attempting to cause felony, rape attempted murder, wandering, rogues and vagabonds, smoking suspected substance and other minor and ridiculous offences. John A Jideonwo (2011) captures it succinctly as he recalls “various horrors and injustices embedded” in the Nigerian prison system.

Many innocent people (about 75% of Awaiting trial Detainees) are languishing in prison for years awaiting a trial that may never come. A large number of the suspects are held for minor offences arising from state laws for

which they could not afford to pay the instant assessment of fines by mobile courts. The plight of women and children in the prison system and the various reports of abuse, especially of pregnant women (61).

In Nigeria, plea bargain affords the accused (Superior Nigerians) the opportunity of parting with an infinitesimal part of the public fund stolen. On the other hand many of the “inferior Nigerians” who are being incarcerated for real and imagined offences poorly investigated...[and] at the courtrooms, some judicial officers fail to dispense justice or failing to exercise judicial discretion appropriately” (KSM Report 2011).

Plea Bargaining

Plea Bargaining is a legal term that indicates the pleading of guilty by an accused person to the crimes he committed in order to attract lighter punishment (Dirk Olin 2002). Black’s Law Dictionary defines it as: “the process whereby the accused and the prosecutor in a criminal case work out a mutual satisfactory disposition of the case subject to court approval”. In plea bargaining, the defendant pleads guilty to a lesser offense or to only one or some of the counts of a multi-count indictment in return for a lighter sentence than is possible for the graver charge. Plea bargain is also defined as “an agreement in a criminal case whereby the prosecutor offers the defendant the opportunity to plead guilty, usually to a lesser charge or to the original criminal charge with a recommendation of a lighter than the maximum sentence”, criminal defendants therefore avoid the risk of conviction at trial on the original more serious charge. For example, “ a criminal defendant charged with a felony theft, the conviction of which would require imprisonment in state prison, may be offered the opportunity to plead guilty to a misdemeanour theft charge, which may not carry jail time”(Wikipedia Online Dictionary). The admittance of guilt therefore may elicit pardon or mercy from the trial judge. A “charge bargain” therefore occurs when the prosecutor allows a defendant to “plead guilty to a lesser charge,” or to only some of the charges that have been filed against him while a “sentence bargain” occurs when a defendant is told in advance what his sentence will be if he pleads guilty. In another definition, it is defined as a deal offered by a prosecutor as an incentive for a defendant to plead guilty. (Robinson 2005).

The argument in favour of plea bargain is that it helps to decongest the courts because if every criminal case goes for trial, the courts would be overloaded and justice delivery is delayed. Plea bargaining thus allows the prosecutor to obtain 'guilty pleas' in cases that might otherwise go to trial and an accused or a defendant is made to plead to a lesser charge, which then invariably attracts a lighter sentence and it saves state time and money. So it helps the judiciary to "dispose of excessive number of cases that courts could not effectively deal with... and the cost implication" (Oliver & Hilgenbery 2006:149). The practice is used widely in the United States of America and some other Western countries mainly those that practice common laws but new in Nigeria.

Plea bargaining is therefore a euphemism for disparity of justice as punishment for offenders for similar offences may receive different punishments based on the trial judge's discretion. In plea bargaining, the stake holders - prosecutor, the defense attorney, the defendant, and in many jurisdictions, the judge, agree on a specific sentence to be imposed if the accused pleads guilty to an agreed upon charge or charges instead of going to trial (Bohm and Haley 21). Despite the acclaimed advantages like cost and time saving, and reduction of crime rate it can lead to abuse and pervasion of justice because it is difficult to eliminate prejudice. In addition, in other cases that do not involve plea bargaining, a plea of guilty means an automatic conviction based on the stipulated punishment as exists in law because there is no provision in law for the "judge to show leniency or impose lighter service for a guilty plea" (Oliver & Allegenbery 150).

Plea Bargaining in Nigeria

Nigeria has become a cesspool of corruption and misrule...public servants help themselves freely to the nation's wealth(Achebe 2012) in a state of widespread corruption as the political elite use "...every means at their disposal, including bribery, intimidation, and blackmail, to cling to power" (Luckham 17). Consequently, public office holders try to outsmart themselves in the embezzlement of public fund. Sunday Agwu (2011) observes that "corruption is a symptom of fundamental failure of governance and so the higher the incidence of corruption, the more sustainable development becomes elusive". He insists that corruption increases poverty and disproportionately affects those in the low income group, but pulls resources from the national treasury into the hands (pockets) of a few

individuals who are politically powerful resulting in the high level of poverty. There is therefore no doubt that the political and economic growth of the country has been dwindling instead of burgeoning as a result of the corrupt practices of public office holders. This has continued unabated because before EFCC and Nuhu Ribadu, no corrupt politician was ever prosecuted and punished for embezzling public fund. Each new administration with its retinue of ministers, ministers of states, special advisers and advisers to the special adviser tries to out-loot its predecessor and so in the words of Freed Agbaje, “Corruption has become a state of the Federation, drawing its weekly and monthly allowances from the Federation Account unabashedly” (Punch December 19 2012) Consequently, aspiration to political positions becomes a do or die affair as the intent is to pluck and plunder national treasury instead of service to the nation. In desperate attempt to join the looting spree, politicians kill, maim and commit all kinds of heinous crimes to get to the desired position.

The intensity and level of corruption got to a climax in 1999 when the Transparency International Index presented Nigeria as the second most corrupt country in the world. It was a big shock so, the then Civilian President, Olusegun Obasanjo passed the Independent Corrupt Practices and other Related Offences Act into law and established the Independent Corrupt Practices and other Offences Commission (ICPC) and the Economic and Financial Crimes Commission (EFCC). Hon Justice Akanbi was appointed to head the ICPC while Nuhu Ribadu headed the EFCC. The ICPC seemed to have been born of a kwashiorkor mother, nourished by the milk of malnutrition and ineffectiveness, and seemed to have remained anemic. Consequently, not much was heard of it. On the other hand, the EFCC bounced out with fresh and energetic blood, fired by youthfulness and vivacity, swung into action and Nuhu Ribadu became a household name, admired by the greater number of the populace but dreaded and hated by the political elite. Fearlessly and courageously he arrested, investigated and prosecuted some corrupt public officers like past governors and other highly placed personalities in the society.

The Nigerian public was aware of the looting by public office holders through their ostentatious and flamboyant lifestyles but the magnitude of the looting came to fore with the first celebrated case of Mr. Tafa Balogun, the former inspector General of Police who embezzled billions of naira. He was later sent to six months imprisonment for a mitigated eight-count charge of

corrupt enrichment and looting of public treasury. Also, Orji Uzo Kalu, Chimaroke Nnamani, Saminu Twaking Jolly Nyame and others were arrested with various charges like fraud, abuse of office, diversion of public fund and money laundering (Punch 19 2007) were arrested.

Corrupt practices of public office holders placed Nigeria in a state of perpetual underdevelopment as Naira continues a downward plunge into an unending devaluation resulting in a hyper- inflation that pauperizes the people and privileges the politicians who are .

Plea bargain could inadvertently, encourage crime as offenders may receive lenient punishments and return to the crime or others may decide to commit the same crime with the hope of plea bargain. The second assumption seems to be the case with Nigerian politicians. For instance, former governors of Edo and Bayelsa states, Lucky Igbinedion and Diepreye Alamieyeseigha, were accused of corruption; after plea-bargains with the EFCC, the former saw 191 charges against him reduced to just one upon conviction and thereafter asked to pay a paltry N3.5m while the latter was sentenced to only two years imprisonment. These offences would have at least guarantee life-sentences after forfeiture of all assets and ill-gotten wealth to the state so other looters are encouraged to loot more. They embezzle public fund, go through plea bargain, refund negligible and minute percentage of what was stolen and go home to enjoy their ill-gotten wealth. The concept of plea bargaining has therefore become the “beautiful bride” (courtesy, late Dr. Nnamdi Azikiwe) of the Nigerian judicial system for the corrupt politicians and public office holders to woo. There have been many cases but we will use four celebrated cases for illustration.

Plea bargaining was popularized in Diepreye Alamiesiegha’s case. He was the governor of Bayelsa State who was sentenced to 12 years in prison on a six -count charge that bothered on corruption and other economic offenses. The trial Judge stated clearly that the sentence would start from the day he was arrested in 2005. Plea bargaining though not new in the Nigerian judicial document, is new in the dispensation of justice in Nigeria as it came to fore with his trial. This is a state where thousands of youths have taken up arms against the Federal Government because of unemployment and lack of basic amenities yet he stacked billions of dollars abroad. He was charged with various offences including “fraud, concealment, conspiracy and money laundering” (Punch 2007 July 27, I) In order to receive a lighter sentence,

he entered into a plea bargain with the EFCC, gave up his right to trial and pled guilty to the charges. Consequently, instead of serving a prolonged prison term if convicted, he accepted the EFCC's offer of guilty plea. He was therefore convicted on a six count charge with each carrying two-year imprisonment so was sentenced to 12 years imprisonment to run concurrently. However, in line with the Criminal Procedure, the sentences ran from the day he was arrested and detained. He was sentenced on Thursday, July 26, 2007 and he went home on Saturday July 28 2007, a free man since he was arrested and detained in 2005.

His case generated a lot of controversies on the appropriateness of plea bargaining in the Nigeria Criminal Judiciary system and also a lot of criticisms from the general public. Some notable Nigerians raised objections to the application of plea bargain in the case because they felt that the conviction and release were nothing but an encouragement for public office holders to go on with their looting spree.

In his own reaction, Mr. Otteh, the Executive Director, Access to Justice, opines:

The plea bargaining thing is a relatively new entrant into the criminal justice system. A number of states are now incorporating it in their laws, even though it doesn't exist in the Nigerian constitution. For example, Lagos State now has specific provisions for people to seek plea bargaining. But is this applicable to the law setting up the EFCC and the ICPC, where we see most of the plea bargains? Well, I don't think so. I don't see where in those laws you can plea bargain yourself out of prison. I think the courts and the prosecutors should tell us where they got those powers. I don't think they follow the law to the letter when they plea bargain serious offences. When the EFCC charges people to court, it is actually charging them for breaching the commission's laws. Now, the question is, does the same laws make a provision for plea bargaining?... (Punch Saturday, 25 June).

In the same way, the Executive Director, Lawyers League for Human Rights, Mr. Jiti Ogunye, in a publication titled, "Criminal Justice System in Nigeria: The Imperative of Plea Bargaining" stated that plea bargaining is a feature of the criminal justice system of common law countries where there is a concept of plea. In civil law systems, where there is no concept of plea, plea

bargaining is regarded as inapplicable. According to him, United States of America, Britain and Canada are leading common law countries that have plea bargain systems, albeit in different stages of development. The Wikipedia on-line dictionary supports this claim: Plea bargaining is extremely difficult in jurisdictions based on civil law. This is because unlike common law systems, civil law systems have no concept of plea—if the defendant confesses; a confession is entered into evidence, but the prosecution is not absolved of the duty to present a full case. It further explains that unlike common law systems, prosecutors in civil law countries may have limited or no power to drop or reduce charges after a case has been filed, and in some countries their power to drop or reduce charges *before* a case has been filed is limited, making plea bargaining impossible. Furthermore, many civil law jurists consider the concept of plea bargaining to be abhorrent, seeing it as reducing justice to barter. These arguments suggest that the introduction of plea bargaining into Nigeria criminal justice system is capable of eroding the credibility of the country's justice system and that it was invented to protect some people as there is no record yet of an ordinary Nigerian that utilized the concept of plea bargaining.

Tafa Balogun was another public officer who was set free based on the concept of plea bargain. Before his arrest and prosecution, he was the Inspector general of Police (IGP). He was arraigned at the Federal High Court Abuja in April 2005 on a “seventy (70) count charge of allegations of corruption on a massive scale” It was alleged that he embezzled public fund, and collected bribes from politicians and criminals. (Guardian April 4 2005) so was sentenced to six months imprisonment, (a lighter sentence he got through plea bargain). He was released on February 6 2006 after serving the jail term, part of it in the National Hospital Abuja. Daily Independent November 26, 2005, reported that he was arraigned on a 45- count charges. His case, was revisited later because of the controversy on whereabouts of the N20 billion paid to EFCC, the anti-corruption agency, following the plea bargain. Mr Balogun entered into a plea- bargain that elicited a lot of criticisms from the public, he paid the sum of N20 billion for a reduced sentence. Unfortunately, several years after the payment, the whereabouts of the money, according to the House committee on Police Affairs chairman, Abdul Ningi, remains unknown amid several allegations, counter allegations and denials.

Lucky Igbinedion's eight years rule in Edo State deepened the state's poverty index, insecurity and unemployment while the poorly governed people groaned hopelessly in hunger and depravation. He was arrested and arraigned by the EFCC in 2008. Consequently, a Federal High Court in Enugu, on December 18, 2008, imposed a fine of N3.5m on Igbinedion. Meanwhile, through plea bargaining and retained his N4.4 billion loot, palatial houses in Nigeria, the UK, USA, South Africa, Canada and multibillion oil tank farm he is building at Apapa, Lagos.

On October 8, 2010, the former Chief Executive Officer of Oceanic Bank International Nigeria PLC, Mrs. Cecilia Ibru was sentenced to eighteen months in prison by the Federal High Court Lagos, Nigeria for committing various economic and financial crimes. The Economic and financial Crimes Commission, EFCC, had charged Cecilia Ibru with a 25 count charge bothering on financial crimes before the Court. However, she entered into a plea bargain with the prosecution and pleaded guilty to a lesser three-count charge. The Court thereafter, convicted Ibru on the three-count charge and ordered the forfeiture of her assets amounting to about N191billion. She was sentenced to six months on each of the three counts which are to run concurrently (Vanguard October 14, 2010).

In Nigeria, public office holders who embezzle public funds are set free but in United States of America, the former Republican Governor, George Ryan, is currently serving out a 6-year prison sentence after being convicted on racketeering and fraud charges. This was a consequence of a decade-long investigation which began with the sale of driver's licenses for bribes and led to the conviction of dozens of people who worked for Ryan when he was secretary of state. The case was in the internet for the world to see but in Nigeria only poor people are liable for conviction and punishment.

Conclusion

In *Animal Farm* the pigs feed fat on the sweat of other animals and invent laws to protect themselves and justify their actions. Likewise in Nigeria, the power elite feed fat on the sweat of the masses and invent plea bargain to consolidate their ill-gotten wealth. The animals fought in the revolution just like Nigerian populace clamoured for democracy but the dividends of the revolution and democracy are for the power elite. A poor person commits a minor offence and gets a higher penalty while the big person commits an atrocity and gets a lighter sentence through plea bargain. The implication is

that a suspect will steal more money knowing that he would plea bargain and secure his freedom so if he intended to steal N5m, he will steal N10m so that he can return half of the stolen funds. Justice is said to be three-way traffic for the state, the accused person and for the society. But plea bargain seems to be for the accused only. Like in *Animal Farm*, it is conceived to privilege a few. A situation where a citizen is incarcerated a minor offense like street trading and another citizen steals billions of naira and is set free is unacceptable. The recommendation is that government functionaries who plunder the wealth of the nation put in their care, should be imprisoned for life to serve as a deterrent for others and plea bargain expunged from the judicial system of the country. The release of over one thousand inmates from prisons in Lagos through KSM free legal services programme is commendable and other organizations are called upon to join.

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