

THE 2014 REVISED JUDICIAL DISCIPLINE REGULATIONS OF THE NATIONAL JUDICIAL COUNCIL: A CLOG IN THE FIGHT AGAINST JUDICIAL CORRUPTION IN NIGERIA¹

Abstract

It was Chinua Achebe in his book titled "There was a Country"² that states that corruption in Nigeria has passed the alarming and entered the final stage, and Nigeria will die if we continue to pretend that she is only slightly indisposed. He went further to state that Nigerians are corrupt because the system they live under today makes corruption easy and profitable. The National Judicial Council (NJC) recently published a Revised Judicial Discipline Regulation which regulates the reception and consideration of complaints against judges. The new rule is aimed at curtailing frivolous petitions against judges and prevents judges from being distracted by vexatious and baseless allegation against them. The writer has looked at the new rule holistically and come up with a view that the new rule will hurt the fight against judicial corruption and other misconducts in the administration of justice in Nigeria. In this article, the NJC is urgently urged to revisit the new rule and remove those provisions that will hinder the efforts in fighting judicial corruption in Nigeria.

Key words: *National Judicial Council, Judicial Discipline Regulation, Corruption, Nigeria*

1. Introduction

Corruption which has variously been described as "pandemic" and "inherently clandestine"³ phenomenon is both of international and local dimensions. It is inextricably tied to the political, economic and social development of nations.⁴ There exist efforts from country to country, and even the international community, aimed at solving the menace of corruption. Some countries have better plans, while others are either paying lip service to the fight against it or are ill-equipped to combat the scourge. Unfortunately, Nigeria is in the former,⁵ despite Judicial, quasi-judicial and legislative attempt to curb the menace of corruption and stymie it.

The entrenchment of democratic governance in Nigeria since 1999 has led to an upsurge in the passage of laws, the design of policies and mechanisms aimed at effectively combating corruption.⁶ They include the following: Code of Conduct Bureau and Tribunal Act 1999, Corrupt Practices and other Related Offences Act 2000, Money Laundering Act 2004, Economic and Financial Crimes Commission (Establishment) Act 2004, Public Procurement Act 2007, Fiscal Responsibility Act 2007, Independent Corrupt Practices and other Related Offences Commission (ICPC), Economic and Financial Crimes Commission (EFCC), Code of Conduct Bureau (CBB), Public Complainants Commission (PCC), Technical Unit on Governance and Anti-Corruption Reforms (TUGAR), Nigerian Extractive Industries Transparency Initiative Act 2007 (NEITI), and Budget Monitoring and Price Intelligence Unit (BMPIU). This was later metamorphosed into the Bureau of Public Procurement (BPP). There have also been various policies or strategies employed or implemented by various governments in Nigeria in a bid to combat corruption.⁷ They include the following: Ethical Revolution (1981-1983), War against Indiscipline (1984),⁸ National Orientation Movement (1986), Mass Mobilization for Social Justice (1987), and War against Indiscipline and Corruption 1996.⁹ Despite this avalanches of legislation,

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² Chinua Achebe, *There was a Country, A personal History of Biafra*, USA, Penguin Press, USA, 2012, p. 249.

³ USAID Program Brief, *Reducing Corruption in the Judiciary*, (Office of Democracy and Governance June, 2009), 6.

⁴ *Ibid*, 2.

⁵ *Ibid*.

⁶ B. Bazuaye *et al*, "Combating Corruption in Nigeria: The Role of the Judiciary", in *Corruption and National Development*, Proceedings of the 46th Annual Conference of the Nigerian Association of Law Teachers held between 22nd-26th April, 2013 at the University of Ilorin, page 561.

⁷ *Ibid*, at p. 564.

⁸ This is one of the things associated with the Buhari-Idiagbon Regime.

⁹ This was the brain child of Abacha administration.

policies and strategies, the corruption rate in Nigeria is still as high as ever. Nigeria was rated in December, 2012 as the 35th most corrupt nation by the Transparency International Corruption Perception Index (CPI).¹⁰

Corruption or any type of vice which was predominant in other arms of government and/or within the general public was seen as an abomination and anathema within the judicial circle.¹¹ Things have changed and nowadays, a lot of editorials and other opinions are written constantly, criticizing what was perceived as the shortcomings of Nigerian Judiciary. Governor Fayose of Ekiti State recently alleged that the Nigeria Judiciary has been largely compromised.¹² He stated that financial inducement and political manipulations have made many judges and lawyers to twist judgment against the innocent.¹³ In the same vein, President Muhammadu Buhari recently while declaring open the 2015 Annual General Conference of the Nigerian Bar Association (NBA) in Abuja, tasked lawyers on the need to take the ethics of the profession very seriously.¹⁴ He stated that the fight against corruption is in reality a struggle for the restoration of law and order.

Sadly, the nation's judiciary, like any other sector, is not immune from corruption. It is corrupt and heavily too.¹⁵ To demonstrate how deeply corruption has eaten into the heart and soul of the judiciary, the Chief Justice of Nigeria (CJN), Justice Mahmud Mohammed, made a shocking revelation that no fewer than 64 of the 1,020 superior court judges had been sanctioned in the past five years for corruption.¹⁶ Despite the revelation by the Chief Justice of Nigeria, the National Judicial Council (NJC) headed by the same Chief Justice of Nigeria (CJN) recently revised Judicial Discipline Regulation. The revised regulation put in place conditions to be met by intending petitioner before his/her petition could be heard by the NJC. These conditions will hinder the efforts in fighting judicial corruption in Nigeria. The NJC is urgently urged to revise the new rules.

2. Clarification of Concepts

Judiciary

Judiciary is the branch of government responsible for interpreting the laws and administering justice.¹⁷ Mention of the judiciary immediately brings to mind Justice of the Supreme Court and Court of Appeal, Judges, Grand Kadis and Kadis, Magistrates, Judges of Customary Courts and other Courts created pursuant to section 6 and as spelt out in Chapter VII of the Constitution.¹⁸ Section 6¹⁹ which creates the courts, empowers them to resolve all matters between persons, or between government, authority and any person in Nigeria, and to all actions and proceedings relating thereto, for the determination of any question as to the civil rights and obligations of that person. Because judges are the embodiment of the judicial powers of the State, they become the central figure in the judicial system and the administration of justice.²⁰ Hence, they have been described as the Oracles in the Temple of Justice.²¹ This, of course, puts them constantly at the public glare. However, in real terms, and taken holistically, the edifice that

¹⁰ B. Bazuaye et al, "Combating Corruption in Nigeria: The Role of the Judiciary", *op cit.* 564.

¹¹ <http://www.newswatchngr.com/Index.php?option=com.content&task=view&id=1>, (accessed on 18/12/2008).

¹² Wole Balogun, Judiciary is corruption – Fayose, *Daily sun*, Vol. 10 No. 3256, Wednesday, October 21, 2015, p. 13.

¹³ *Ibid.* The Speech delivered by Governor Fayose at the Cathedral Church of Emmanuel Oke-Isa Ado Ekiti during the 2015 Church Service of Ekiti State Legal year.

¹⁴ G. Tsa, Place of Judiciary in Buhari's Corruption War, *Daily Sun*, Vol. 10 No. 3241, Wednesday, September 30, 2015, p. 39.

¹⁵ *Ibid.*

¹⁶ *Ibid.*

¹⁷ B. A. Garner (ed), *Black's Law Dictionary*, 8th ed; Thomson West, USA, 2014, p. 864.

¹⁸ Constitution of the Federal Republic of Nigeria 1999 (as amended).

¹⁹ *Ibid.*

²⁰ B. Bazuaye, *op cit.*, 570.

²¹ *Ibid.*

makes up the judiciary includes court officials (judicial staff), the police prosecutor and members of the bar who are worshippers in the temple of Justice.²² We shall adopt this holistic definition in this work.

Corruption

It is not an easy task to define or attempt a precise and universally acceptable definition of corruption. Several unsuccessful attempts have been made to define corruption or its constituent acts with the resultant divergent views. Learned authors have posited that the term corruption includes all the forms of improper or selfish exercise of power and influence attached to a public as well as private office.²³ In the Corrupt Practices and other Related Offences Act,²⁴ corruption is defined to include bribery, fraud and other related offences.²⁵ Offences punishable include wilful giving and receiving of bribes and gratification to influence a public duty, fraudulent acquisition and receipt of properties, deliberate frustration of investigation by the anti-corruption commission (ICPC), making false returns, making of false or misleading statements to the anti-corruption commission, attempts, conspiracies and abetments of offences under the Act. Corruption is defined in the Black's Law Dictionary thus:

An impairment of integrity, virtue, or moral principle; especially the impairment of a public official's duties by bribery or the act of doing something with an intent to give some advantage inconsistent with official duty and the rights of others; a fiduciary's or official's use of a station or office to procure some benefit either personally or for someone else, contrary to rights of others.²⁶

To get a clearer meaning, it is necessary to view the meaning of the adjective 'corrupt.' According to Black's Law Dictionary,²⁷ 'corrupt' means having an unlawful or depraved motive; especially influenced by bribery.²⁸ 'Corrupt' is also defined as: '... to bribe'.²⁹ From the foregoing, it is easy to see that one string that runs through various definitions of corruption is the wrongful desire of pecuniary gain or acquisition of any other advantage. In *Cooper v. Slade*,³⁰ the House of Lords was of the view that 'corruptly' means "purposely doing an act which the law forbids as tending to corrupt."

World Bank recently released numbers indicating that about \$400 Billion has been pilfered from Nigeria's treasury since independence.³¹ One needs to stop for a moment to wrap one's mind around that incredible figure. This amount - \$400 Billion - is approximately the Gross Domestic Products of Norway and of Sweden.³² In other words, Nigeria's corrupt ruling class stole the equivalent of the entire economy of a European Country in four decades! This theft of national funds is one of the factors essentially making it impossible for Nigeria to succeed.

It may not be out of place to say that the damage that the corrupt attitude of our leaders has caused the people of this country could be said to be beyond repair.³³ This is because it has made almost everybody to be corrupt one way or the other. It has spread through every aspect of our national life. We have reached a point at which corruption has permeated almost every department of our national life. Corruption has become a way of life in Nigeria, and since Nigeria's Judiciary is composed of Nigerians,

²² *Ibid.*

²³ Y. Akinseye-George, *Legal System, Corruption and Governance in Nigeria*, New Century Law Publishers Ltd, Lagos, 2000, p. 9.

²⁴ Cap. C31 Laws of the Federation of Nigeria, 2004.

²⁵ *Ibid.*, See *Federal Republic of Nigeria v Inyang* (2005) 3 QCCR 120.

²⁶ B. A. Garner (ed), *Black's Law Dictionary*, 9th ed., Thomas Reuters, St. Paul Minnesota, USA, 2009, p.397.

²⁷ *Ibid.*

²⁸ *Ibid.*

²⁹ M. Robinson (ed), *Chambers 21st Century Dictionary*, Chambers Harrap Publishers Ltd., 1999, p. 306.

³⁰ [1857] HL Cas 746.

³¹ C. Achebe, *There was a Country, A personal History of Biafra*, *op cit*, 249`

³² *Ibid.*

³³ K. Odepeju, "Nigeria of Leadership and Corruption", available at: <http://allafrica.com/stories/200811280695.html>, (last accessed on 18th February, 2008).

the story cannot be expected to be different. Not surprising, Nigeria is commonly referred to as the headquarters of the Advanced Free Fraud otherwise known as 419.³⁴

3. Cleaning the Augean stable with the NJC Hammer

For some time now, the prevalence of corruption in the nation's judiciary has been a major concern to stakeholders, particularly the Nigeria Bar Association (NBA) and the top echelon of the justice sector. Successive Chief Justice of Nigeria, CJN and the NBA presidents have vowed to rid institution of justice of the vice with little success achieved.³⁵ A retired Chief Justice of Nigeria, Justice Dahiru Musdapher, had in his efforts to clean up the rot in the judiciary constituted a 28-member judiciary stakeholders committee comprising all retired Chief Justices of Nigeria to examine holistically, the rot in the judiciary and come up with clinical solutions capable of returning the nation's third arm of government to its path of glory and honour. The committee was headed by Justice Muhammad Lawal Uwais. In his inaugural speech during the meeting, Musdapher drew the attention of the stakeholders to the quality and timelines of the trial process, procedural inefficiencies, poor infrastructure, and poor conditions of service for judicial and non-judicial officers, declining intellectual quality and reasoning content of delivered judgments, corruption as well as the effects of an unrestrained quest for political power.³⁶ The NJC is the body charged with the responsibilities of welfare and discipline of erring judicial officers. The NJC under Muktar held an emergency meeting on February 21, 2013 to review the pending cases of judicial misconduct against some judges. At the end of its deliberations, the NJC recommended the compulsory retirement of two judges.³⁷

In all, the following judges have fallen under the hammer of the NJC for corruption related cases. On February 26, 2014, the NJC announced the compulsory retirement of Justice Gladys Olotu of the Federal High Court for breaching judicial procedure by delivering a judgment in a case with Suit No.FHC/UY/250/2003, 18 months after the final address by all the counsel in the suit, contrary to the constitutional provisions that judgment should be delivered within a period of 90 days.³⁸ Also, in 2014, the NJC recommended the compulsory retirement of Justice U.A. Inyang of the High Court of the Federal Capital Territory (FCT) Abuja for misconduct. Inyang was found to have "included in his judgment, references to the garnishee proceedings, which came after judgment, had been delivered on December 20, 2011. His Lordship also included the name of the counsel to Federal Road Maintenance Agency, FERMA, and Chief Chukwuma Ekomaru (SAN) who came into the matter after the judgment of December 20, 2011 was delivered."³⁹ In February, 2013, the NJC recommended the compulsory retirement of Justice Charles E. Archibong, who was then serving at the Federal High Court, Lagos, following investigations conducted by the Council on series of petitions leveled against him. Some of the allegations were that he dismissed a grievous charge against an accused without taking his plea and refused to release the Certified True Copy of his ruling to lawyers.⁴⁰ He was also accused of issuing bench warrant on some Peoples Democratic Party (PDP) officials for contempt even when the counsel who was directed by the court to serve them filed an affidavit that he had not been able to serve the contempt application. Archibong was said to have also made unfounded and caustic remarks on professional competence of some Senior Advocates of Nigeria and exhibited glaring procedural irregularities which showed that he did not have a full grasp of the law and court procedure.⁴¹

More still, the NJC in February, 2013, recommended the compulsory retirement of Justice Thomas D. Naron, then of High Court of Justice, Plateau State following its findings that there were constant and regular voice calls and exchange of text messages between the judge and one of the lead counsel for

³⁴ "419" is named after Section 419 of the Criminal Code Act which deals with obtaining property by false pretences and cheating.

³⁵ G. Tsa, "Place of Judiciary in Buhari's Corruption War", *Daily Sun*, Wednesday, September, 30, 2015, p.39.

³⁶ *Ibid.*

³⁷ *Ibid.*

³⁸ *Ibid.*

³⁹ *Ibid.*

⁴⁰ *Ibid.*

⁴¹ *Ibid.*

one of the parties to the suit in the Osun State gubernatorial Election Tribunal, contrary to the Code of Conduct for Judicial Officer contained in Section 292 (1)(b) of the Constitution.⁴² The NJC in July, 2013 announced the compulsory retirement of Justice Nwanosike over alleged falsification of his date of birth. The NJC said it found that Justice Nwanosike falsified his date of birth which invariably affected his retirement age. It directed him to proceed on compulsory retirement.⁴³ Justice Nwanosike was the ex - Aba State Acting Chief Judge. In 2011, the NJC ordered an immediate sack of Justice Musa Ibrahim Anka, of the Zamfara State High Court, having found him guilty of gross misconduct (bribery and corruption). It found that the judge received bribe from one Zubairu Abdulmalik in order to deliver judgment in his favour. Anka before then had been on suspension by the Council since July 2010, following a petition written against him by Zamfara State Directorate of State Security Service (DSS), alleging that he received bribe from Zubairu Abdulmalik in order to deliver judgment in his favour.⁴⁴ Again, on March 26, 2014, the NJC rose from its general meeting with a decision to suspend President of the Rivers Customary Court of Appeal, Justice Peter Agumagu, for allowing himself to be sworn - into office as the State's substantive Chief Judge. The NJC refused to recognize him as the Chief Judge on the ground that the normal procedure for the appointment of a Chief Judge was not complied with. He challenged the decision at the Supreme Court, but three appeals he filed were dismissed. NJC suspended him after saying it did not recommend him to former Governor Rotimi Amaechi for appointment as the Chief Judge. Agumagu was, however, dissatisfied with his suspension. He consequently filed an application for a judicial review of the NJC's directive suspending him.⁴⁵

The NJC has warned judges to stop compromising themselves by issuing orders or giving judgments that cannot be defended on the basis of the available facts and the applicable law. With the sanctions imposed on erring judges, a strong message has been sent to judges and lawyers that it is no longer business as usual.

4. X-ray of some salient provisions of the 2014 Revised Judicial Discipline Regulations of the National Judicial Council

The regulations state new rules governing the reception and consideration of complaints against judges. The revised rules are aimed at curtailing frivolous petitions against judges and prevent judges from being distracted by vexatious and baseless allegations against them. Rule 4 (1) of the Revised Regulations provides that a complaint must be made within six months of the event or matter complained of, provided a complaint relating to a continuing state of affairs may be made at any time while the state of affairs continues or within six months from when it ends. Rule 4 (2) provides that "subject to Regulation 5, a complaint made outside the time limit set in paragraph 1 must be dismissed by the Council upon report to the Council by the Secretary to the Council." Rule 5(1) states that "the Chief Justice of Nigeria/Chairman of Council may extend a time limit under these regulations, whether or not the time has expired, where there is good reason to do so." Rule 5(2) provides that "a person, who is refused an extension of time limit under paragraph 1, may make a representative to the Chief Justice of Nigeria/Chairman of Council, asking the Chairman, within 14 working days of being notified of the refusal, asking him/her to refer the request for an extension of time to the Council." Rule 6 deals with the consequences of failure to meet the time limit, which is dismissal. Under Rule 7(5) (a), "a complaint must be signed by the complainant and accompanied by a verifying affidavit deposed to by the complainant before a court of record."

5. Critique of the New Regulations

Rule 4 (1) of the Revised Regulations ensures that complaints can only be brought to the Council during the time when a misconduct is alleged to be taken place or within six months after it ends. Any allegations brought after this window will be dismissed unless by virtue of Rule 5 of the Regulation, the Chief Justice of Nigeria exercises discretion to allow the admission of the complaint. A complainant may also appeal a decision not to extend time to the Council.

⁴² Constitution of the Federal Republic of Nigeria 1999 (as amended).

⁴³ G. Tsa, "Place of Judiciary in Buhari's Corruption War", *Op cit*, p.39.

⁴⁴ *Ibid.*

⁴⁵ *Ibid.*

In many instances, cases of misconduct, particularly those concerning corruption occurring in the course of a judicial adjudication are only known after the facts, and there is usually no timeline for coming to this knowledge. In most cases, the corrupt conduct of a judicial officer may only become public knowledge following a careless slip or from the irrepressible work of investigation reporters. Whenever the facts become known, let due process follow! There should be no statute of limitations applicable to judicial corruption or misconduct. Insisting that complaints made after 6 months will only be considered at the discretion of the NJC Chairman or after an appeal to the Council creates unnecessary hurdles for complainants and real dangers that such complaints will go uninvestigated if complainants lack the ability or knowledge to sustain a bi-furcated appeal over the rejection of the complaint. Our fight against corruption in the administration of justice ought to run a freer course.⁴⁶

The Regulations require that the complaint be accompanied by a verifying affidavit deposed before a court of record. The requirement of a verifying affidavit is wrong foot forward. The imposition of a verifying affidavit requirement on every complaint could possibly discourage the making of frivolous, malicious and unfounded allegations against judges; however, this must be considered against other compelling needs. A verifying affidavit, in our opinion, stretches the responsibility for credibility a little too far and technicalizes what ought to be simple, accessible and straightforward procedure or action for two major reasons: first, many otherwise valid complaint may be made by people who lack information of the technical requirements now being imposed by the Council. If aggrieved people make credible complaints against judges and these complaints are peremptorily discountenanced because they have not complied with a stated procedure or because they lack some formality, the judiciary deprives itself of fair and early warning that a person of questionable integrity may be in its midst. This will not do justice to the complainant, to the cause of justice, nor too, to the Judiciary and society.⁴⁷

Secondly, some complainants, out of concern for the integrity of the justice system may simply want to alert the NJC about the suspicious profile or behavior of a judicial officer that may be suggestive of inappropriate conduct. These sorts of interventions are not adversarial in nature and these kinds of alerts may require further investigation by another agency. All such a “complainant” may want is for the NJC to become aware of a potential problem and take things from that point forward by conducting its own inquiries or referring the matter to another agency that can do so. This will often be the approach many anonymous informants will choose. The NJC has, in the past, referred complaints or allegations to other security agencies for investigation. It did so in the complaints brought against Justice Ayo Salami, former President of the Court of Appeal; Justice Naron Thomas, former Judge of Plateau State and the Osun State election Tribunal; and the former Chief Judge of Akwa Ibom State, Justice Idiong.⁴⁸ So, even in the experience of the NJC, unverified allegation have in the past ultimately led to the substantiation of allegations against judges and formed the basis of disciplinary action against some judges. The NJC must show stronger justification for delegitimizing procedures that have produced positive results for it in the past.⁴⁹ Insisting, that whistle-blowers or informants must verify the “truth of the facts alleged” can act as a strong disincentive to whistle-blowers or informants (who already run risks for leaking relevant information) to come forward with that disclosure.⁵⁰

Effective complaint systems encourage, and not stifle feedbacks or complaints even when offered anonymously. The NJC Rule could be likened to asking a police informant or complainant who has suspicions about another person’s guilt concerning a crime to verify with an affidavit the truth of

⁴⁶ M. Nuruddin, “NJC’s New Petition Guidelines: Clog in the fight against Corruption”, *Daily Independent*, Vol.12 No. 79, Thursday, September17, 2015, p. 28.

⁴⁷ *Ibid.*

⁴⁸ *Ibid.*

⁴⁹ *Ibid.*

⁵⁰ Why new Judicial Regulations will embolden Corrupt Judges; obtainable from <http://www.premiumtimesng.com/news/top-news/190087-why-new-judicial-regulation-will-embolden-corrupt-judges-group.html>, (accessed on 23/10/15).

his/her suspicion that the suspect may have committed the crime before the police can investigate the allegations or information.⁵¹

Furthermore, whether or not a complaint is “verified” by an affidavit does not diminish or increase the burden of investigation required to be undertaken, or the relevant standard for substantiating allegations of misconduct against anyone by the NJC. Therefore, irrespective of the presence, absence or strength of a “verifying affidavit” the NJC must still provide a fair, thorough and impartial hearing of the complaint. So, the verifying affidavit has absolutely no fair hearing value in relation to the determination of a complaint.⁵²

Again, the rule itself can appear ambiguous or confusing to many people as to its meaning. Rule 4(7) provides that the complainants must verify “... the truth of the facts alleged” in the affidavit. In this context, the “truth” would possibly be interpreted by many people to mean the truth of the misconduct alleged. In fairness, the NJC must concede that the rule is possible to be misconstrued even by people with reasonable literacy levels. In any event, it should be said that the duty to investigate, verify and substantiate a complaint in relation to a crime is the responsibility of the police; in the same way it is the responsibility of a disciplinary body like the NJC and not the complainant to investigate and substantiate a complaint. There is no legal justification for pushing that duty to the complainant.⁵³ Lastly, with the verifying affidavit accompanying the petition, a petitioner who makes allegations that turns out to be false against a judge is liable for perjury and also arms the concerned judge to sue for damages.

The NJC is therefore urged to revisit the new rule. The NJC can curtail the making of frivolous complaints by providing a general warning that makers of mischievous allegations may face prosecution for interference with the administration of justice and then liaising with law enforcement agencies to enforce the existing laws against the administration of justice in manifest cases of bad faith and smear campaigns against judges. Reforms that strengthen the integrity of the judiciary/the justice system and protect the independence of the judiciary are welcome. However, the new Regulations will not strengthen the integrity of the judiciary neither will it protect its independence.

6. Conclusion

The NJC, by the revised guidelines, wants to guard against unnecessary petitions. That objective can be achieved without encumbering the accessibility of the NJC’s complaint process with unnecessary legalism. While we support efforts to reduce inordinate pressures on time and concentration of judges, we urge that judicial integrity should not be sacrificed for technicalities of form and time. The primary concern of the NJC should be seeking ways to eradicate corruption within the judiciary and not limiting the channels of exposing it. The new Rules will strain or hurt the fight against corruption and other misconduct in the administration of justice. The NJC should revisit the new Rules and remove provisions which fetter the right and ability of citizens to make *bona fide* representations to the Council which the Council will act on. The NJC is urgently urged to revisit the new rule and remove those provisions that will hinder the efforts in fighting judicial corruption in Nigeria.

⁵¹ M. Nuruddin, “NJC’s New Petition Guidelines: Clog in the fight against Corruption”, *Daily Independent*, Vol.12 No. 79, Thursday, September 17, 2015, p. 28

⁵² *Ibid.*

⁵³ *Ibid.*