

Understanding the Nigerian Law of Defamation, the Inhibitions and Prospects for Nigerian Journalists

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ABSTRACT: This study predicated on Marketplace of Ideas Theory, seeks to understand the law of defamation, the inhibitions and the prospects for Nigerian journalists. The study also traversed the Nigerian law of defamation and the concomitant issues that might stiffen freedom of expression, as well as restrict journalists from functioning effectively in the field of journalism, amongst others. Findings indicate that enormous inhibitions exist, such as chilling effect on freedom of expression, high cost and lengthy legal process, as well as ambiguous legal standards, amongst others. The study concludes that all these have frightening effects on journalists' ability to discharge its functions unfettered. However, the study recommends, amongst other things, legal reforms and strategic training for journalists on understanding and positive navigation of law of defamation.

Keywords: *Understanding, Law of Defamation, Inhibition, Prospect, Journalists*

INTRODUCTION

For Nigerian journalists, the law pertaining to defamation is a crucial topic of concern since it affects their capacity to

report ethically and openly. Libel (written defamation) and slander (spoken defamation) are two types of defamation that can occur when someone makes false comments that damage the reputation of another person. It should be noted that Defamation is addressed through a combination of laws, including the Nigerian Criminal Code (Operational in Southern Nigeria), and the Penal Code (Operational in Northern Nigeria), the Cybercrime Act and common law principles. These laws define defamation as a false statement that injures a person's reputation, which can be pursued as either a civil or criminal matter. It should also be noted that criminal defamation can result in imprisonment, while civil defamation can lead to remedies like apologies and damages.

The legal framework for defamation in Nigeria can be found in the Criminal Code Act, particularly in sections 373-381, which amongst other things provides for imprisonment for one, or two years if they knew the statement was false. Penal Code Act addressed defamation in Northern Nigeria in sections 391-395, where it outlined the relevant offences and punishments. Cybercrime (Prohibition, Prevention, Etc) Act 2015, which specifically criminalizes online defamation, including publishing false and offensive communications online. The Constitution of the Federal Republic of Nigeria 1999, as amended, particularly, in section 39, which guarantees freedom of expression, subject to several limitations, including laws against defamation., and the Common law principles derived from English law, which play significant role in regulating libel and slander through judicial precedent.

In order to prevent litigation and criminal penalties stemming from defamation accusations, journalists need to exercise caution when navigating these legal environs. It is crucial for responsible journalism to comprehend the nuances of defamation law because it makes it easier to discern between factual reporting and defamatory material. This involves being informed of the defenses against liability that are available in defamation proceedings, such as truth, fair comment, and privilege (Okonkwo, 2019).

Furthermore, since defamatory content may spread quickly and widely through online publications and social media posts, the emergence of digital media has presented additional difficulties for the field of defamation law. Reforms that address

the particularities of online defamation have been called for because the current legal frameworks frequently fail to keep up with these technological improvements (Akinwale, 2020). However, section 24 of the Cybercrime (Prohibition, Prevention, Etc.) Act 2015, as amended, deals with online harassment and cyberstalking, which have historically been used to prosecute cases related to online defamation. It should be noted that the original Act criminalized sending messages that were ‘grossly offensive’ ‘insulting’ or ‘false’ for the purpose of ‘causing annoyance, inconvenience... enmity, hatred, ill will or needless anxiety’.

However, these vaguely worded provisions were widely criticized and challenged in court for violating the constitutional right to freedom of expression. In 2024, the Cybercrime Act was amended following a ruling by the ECOWAS Court of Justice, which ordered Nigeria to bring the section into conformity with international human rights laws. Hence this current version of Section 24 that narrows the offense to publications that are pornographic or ‘knowingly false, for the purpose of causing a breakdown of law and order, posing a threat to life, or causing such message to be sent’. This presupposes that defamation is not exclusively an offense under the Cybercrime Act, and that simple online insults or false stories are no longer criminal offenses under this section, though defamation can still be prosecuted under other laws. Despite the above, navigating this intricated legal web might pose a challenge for journalists, particularly, in the quest to preserve journalistic integrity and to stay clear of legal hazards.

Statement of the Problem

Journalists covering prominent personalities or contentious topics may find themselves self-censoring as a result of the constant fear of defamation lawsuits. Investigative journalism might be discouraged by media organizations, especially smaller ones, because of the attendant effect of a possible defamation suit on the finances of the media establishment, as well as the possibility of significant financial losses. Furthermore, the legal framework does not often clearly delineate between opinions and statements of truth, nor does it offer journalists strong defenses like the “actual malice” threshold that other jurisdictions use to shield speech critical of public officials. The lack of clearcut interpretations and the possibility of misusing

defamation lawsuits as instruments of intimidation and repression of dissent, only serve to worsen this issue. Consequently, the press' vital function in promoting public dialogue and holding those in positions of authority accountable may be compromised, given the complex nature of the law of defamation and the fear often expressed by journalists for defamation charge. Given the above, this study seeks to understand the Nigerian law of defamation, and how law of defamation stiffens Journalists' freedom in Nigeria.

Objectives of the Study

The objectives of the study are to:

1. Understand the Law of Defamation
2. Find out the inhibitions imposed by defamation Law for journalists in Nigeria
3. Assess the prospects of defamation Law for journalists in Nigeria

Theoretical Framework

The Marketplace of Ideas Theory, which has its roots in the writings of John Stuart Mill and subsequently John Milton, asserts that truth is eventually discovered through the free exchange of ideas in a competitive setting. This theory served as a fundamental basis for the development of contemporary conceptions of free expression, including defamation law. The marketplace of ideas thesis provides support for a legal framework in defamation law that safeguards free speech and offers remedies for harm caused by false assertions (Schauer, 1982). This theory amplified free speech protected in many democratic countries, including Nigeria, as expressed in Section 39 of the Constitution of the Federal Republic of Nigeria 1999, as amended, which guarantees the right to free expression.

However, the theory recognizes that untrue statements can cause serious injury to persons, hence the need for defamation laws. Defamation law acts as a check on the marketplace of ideas by holding people accountable for making false claims that harm others' reputations. By establishing remedies for defamation, the law ensures that the marketplace stays fair and that the sharing of ideas does not cause undue

injury. All the same, in order to safeguard claims made in good faith or in the public interest, the marketplace of ideas theory must make sure that a variety of opinions are expressed (Okonkwo, 2019).

Journalism

The profession of journalism involves the collection, evaluation, production, and dissemination of news and information. It is also the end result of these endeavors. Because journalism conforms to particular principles and practices, such as accuracy, impartiality, and independence, which aim to inform the public and contribute to the democratic process, it can be distinguished from other types of communication (Kovach & Rosenstiel, 2014). There are many different roles in journalism, such as writing, editing, broadcasting, and reporting. Journalists gather data from multiple sources, confirm the facts, and present it in a way that is easily readable by the general public. The field includes radio, television, print newspapers, magazines, digital platforms, and television (Harcup, 2015).

Further, Chukwu (2019) quips that the essence of journalism is to provide citizens with reliable information through the discipline of verification. And such information cannot be available without unhindered access to information. Which scholars argued, play a key role in a system of checks and balances designed to limit the overreach of powers concentrated in governments, businesses and other entities and individuals. In carrying-out this onerous task, Kovach & Rosentiel (2014) opined that “journalists’ first loyalty should be to the citizenry, obligated to tell the truth, and must serve as an independent monitor of powerful individuals and institutions within society.

In Nigeria, the media and journalists play important roles. Several scholars have attributed most of the successes achieved by the country to the resilience and doggedness of journalists, and by extension, the media. They listed the following as some of the landmark achievement of media: attainment of independence, and enthronement and sustenance of democracy (Chukwu & Ihejirika 2018).

Understanding the Law of Defamation

Agbakoba (2022) asserts that defamation in law is the act of communicating false statement about a person that result in damage to that persons' reputation. Similarly, Justice Dore in Swindler (1955) quips that "Any written or printed article published of and concerning a person without lawful justification or excuse and tending to expose him to public contempt, scorn, obloquy, ridicule, shame or disgrace, or intending to induce an evil opinion of him in the mind of right thinking persons, or injure him in his profession, occupation or trade is libelous and actionable, whatever the intention of the writer may have been. The word need not necessarily impute actual disgraceful conduct to the plaintiff; it is sufficient if members of public rendered him contemptible and ridiculous". Crone (2002) asserts that the distinction between libel and slander is relevant only to the issue of damages. He further quips that damage is presumed in the case of libel, whilst in case of slander, the claimant has to prove certain loss, unless the allegation falls within one of four exceptions where damage is presumed:

1. An allegation that the claimant has committed a crime punishable by imprisonment.
2. An allegation that the claimant is suffering from a contagious or infectious disease.
3. 3. An allegation that the claimant is an unchaste woman or is a woman who has committed adultery.
4. An allegation that is likely to damage the claimant's business or profession.

Types of Defamation

There are two types of defamation – Libel and Slander. For Libel, Bowles and Borden (2004) note that it is "a false statement that exposes people to hatred, ridicule or contempt, lowers them in the esteem of their colleagues, causes them to be shunned or injures them in their business or profession."

Types of Libel

There are two major types of libel – Criminal and Civil libel

Criminal libel refers to “Any intentional false communication, either written or spoken, that harms a person's reputation; decreases the respect, regard, or confidence in which a person is held; or induces disparaging, hostile, or disagreeable opinions or feelings against a person. Defamation may be a criminal or civil charge. It encompasses both written statements, known as libel and spoken statements, called slander” (The Free Legal Dictionary).

Further, Crone (2002) asserts that “A criminal libel must be in permanent form and that the words must tend to vilify a person and to bring them into hatred, contempt and ridicule.” It should be noted that criminal libel differs from civil libel in a number of respects and that the accuracy or truth of a statement in criminal libel will not necessarily protect its maker from punishment. ‘The greater the truth the greater the libel’ is a phrase that is rooted in this branch of the law. It has always been recognized that the truth is more often to arouse fury than obvious falsehood. Unlike civil libel, those accused of criminal libel must establish that the words were true and that they were punished for the public benefit.” Bowles and Borden (2004) quip further that to prove that a statement is defamatory, in the case of libel, “A person who sues for libel must prove that the statement was published, the plaintiff was identified in the statement, the statement was defamatory, the statement caused injury and that the publisher was at fault in publishing the statement.”

Slander

Slander occurs when an individual or group's reputation is attacked through spoken words or gesture, especially believed to be false and malicious but presented as fact. Kayne (2012) says, “Slander is the spoken or transitory form of defamation of character, a legal term that refers to a falsehood presented as true which could harm the reputation of a person or entity. Slander also encompasses body gestures as in the case of sign language. Slander is a tort, and for an individual to be successfully sued and found guilty of slander, the plaintiff has to establish that the accused actually

uttered those words, that the words were overheard by a third party, that the words are false and that those words identify the plaintiff, and they have a malicious intent.

It should be noted that defamation law is primarily intended to shield people from unjustified attacks on their reputation and to offer redress in cases of reputational injury. Dobbs (2019) also opines that defamation is intricate and differs greatly throughout jurisdiction. Given the above, it is safe to say that the fundamental components of defamation law are usually a false statement, disclosure to a third party, and subsequent harm to the subject's reputation.

In Nigeria, the Criminal Code Act and the Penal Code Law are the laws that provide for the offence of defamation. Defamation can take the form of slander or libel. For a claimant to succeed in an action for defamation, the claimant must be able to prove that the words were defamatory not only to a few members of the public, but the general public, that the defamatory words referred to the claimant, and that the words were published (to at least one person other than the plaintiff). Section 392 of the Penal Code Law provides for criminal defamation thus that any person who defames another shall be punished with imprisonment for a term that may extend to two years, or with a fine, or with both. The Penal Code Law further extends the punishment of any person who prints or engraves a matter knowing it to be defamatory with imprisonment for a term that may extend to ten years, a fine or both, while the sale of printed or engraved material containing defamatory matter is punished with imprisonment for a term that may extend to five years, with a fine, or both. Similarly, Section 375 of the Criminal Code Act provides that any person who publishes any defamatory matter is guilty of a misdemeanor and is liable to imprisonment for one year; and any person who publishes any defamatory matter knowing it to be false, is liable to imprisonment for two years. The provision further states that a defendant who publishes a defamatory matter with the intent to extort is guilty of a felony and is liable to imprisonment for seven years. The above provisions indicate the severity of defamation, which can be criminal, as well as treated under the law of tort.

However, a person who is sued for defamation can raise any or the defences provided by the law, such as Justification, Truth, Fair comment, Privilege, etc. Justification and Truth (Section 377 of the Criminal Code Law; Section 391(2)(i) of

the Penal Code Law). This portends that publication of defamatory matter is not an offence if the publication is, at the time it is made, for the public's benefit and if the defamatory matter is true. Fair comment (A defendant will only be successful with the defence of fair comment if they can show that they expressed their opinion in good faith based on facts truly stated on a matter of public interest.). Privilege (**Section 378 of the Criminal Code Law and Section 379 of the Criminal Code Law**). Privilege is either absolute or conditional. The former protects the speaker or publisher without reference to his motives or the truth or falsity of the statement. This may be claimed with respect, for instance, to statements made in performance of a political, judicial, social, or personal duty. It should also be noted that limitations exist regarding the period within which to commence defamation action in court. This indicates that any defamation action brought outside the period stipulated by the law will become statute-barred.

Factors Responsible for the Law of Defamation

Numerous historical and modern circumstances have influenced Nigeria's defamation legislation. The colonial history, the necessity of striking a balance between one's own reputation and the right to free speech, the impact of global legal norms, and the emergence of digital media are some of these reasons.

1. Colonial Legacy: Nigeria's legal system, including its defamation laws, is significantly influenced by English common law, inherited from its colonial history. The principles of defamation established in English law were adopted and adapted to fit the Nigerian context. This colonial heritage forms the foundation of Nigeria's current legal framework for defamation (Nwabueze, 2016).
2. Protection of Individual Reputation: One of the primary reasons for defamation laws is to protect individuals' reputations from unwarranted harm. In a society where personal and professional reputation is highly valued, defamation laws serve as a necessary tool to provide redress for those whose reputations are unjustly tarnished by false statements (Okonkwo, 2019).
3. Balancing Freedom of Expression: The Nigerian Constitution guarantees the right to freedom of expression under Section 39. However, this right is not

absolute and must be balanced against the need to protect individuals from defamatory statements. The law of defamation attempts to strike a balance between allowing free speech and protecting reputations.

4. **Influence of International Legal Standards:** International human rights frameworks, such as the Universal Declaration of Human Rights and the International Covenant on Civil and Political Rights, influence Nigerian defamation laws. These international standards advocate for freedom of expression while also recognizing the need to protect individuals from false and damaging statements (Human Rights Watch, 2020).
5. **Judicial Precedents and Case Law:** Judicial decisions in defamation cases play a crucial role in shaping the law. Nigerian courts rely on precedents set by previous cases to interpret and apply defamation laws. These judicial precedents help to clarify the legal standards for what constitutes defamation and the available defenses.
6. **Technological Advancements and Digital Media:** The rise of the internet and social media has introduced new challenges for defamation law. Online platforms allow for the rapid spread of information, including potentially defamatory statements. Nigerian defamation law is evolving to address issues related to digital media, such as the jurisdictional challenges of online defamation and the difficulty of regulating content on global platforms (Akinwale, 2020).
7. **Socio-Political Environment:** The socio-political context in Nigeria also influences defamation law. Politicians and public figures often use defamation suits as a tool to silence critics and control the narrative. This dynamic raises concerns about the potential misuse of defamation law to stifle freedom of expression and dissent (Uko, 2018).

Inhibitions Imposed by Defamation Law for Journalists

Scholars agree that defamation legislation has become a tool leveraged to whip and shape journalists, as well as the media. Oftentimes, where nothing defamatory exists, politicians, as well as others, have utilized defamation or allegation of defamation to harangue journalists and the media. Thereby creating a situation where the fear of defamation allegation or charges is the beginning of wisdom for the journalists and

the media. Thus, editors or media houses who wanted to stay alive or afloat were careful not to offend or be dragged about in court for defamation. Besides the above, other inhibitions exist such as:

1. Chilling Effect on Freedom of Expression

Defamation laws in Nigeria, while designed to protect individuals' reputations, often have a chilling effect on journalists' freedom of expression. The fear of legal repercussions can lead to self-censorship, where journalists avoid reporting on sensitive or controversial issues to stay clear from potential defamation suits (Okonkwo, 2019).

2. High Costs and Lengthy Legal Processes

Defending a defamation lawsuit can be expensive and time-consuming. The legal costs and the extended duration of court cases can deter journalists and media organizations from pursuing investigative journalism, especially when the risk of being sued for defamation is high (Akinwale, 2020).

3. Ambiguous Legal Standards

The ambiguity in defamation laws regarding what constitutes fair comment, public interest, and malicious intent can create uncertainty for journalists. This lack of clear guidelines makes it difficult for journalists to navigate the legal landscape and often results in cautious and less critical reporting (Nwabueze, 2016).

4. Political Manipulation and Abuse

Defamation laws are sometimes exploited by powerful individuals and political figures to stifle dissent and critique. By filing defamation suits against journalists, these individuals can intimidate and suppress critical reporting, undermining the role of the press in holding power to account (Uko, 2018).

5. Impact of Digital Media

The rise of digital media has exacerbated the challenges related to defamation. The rapid dissemination of information online increases the risk of defamatory content spreading quickly, leading to more frequent and widespread defamation claims.

Additionally, existing laws often fail to adequately address the complexities of online defamation, leaving journalists vulnerable (Akinwale, 2020).

6. Inadequate Legal Protections for Journalists

There is a need for stronger legal protections for journalists to safeguard them against unwarranted defamation suits. Current laws do not provide sufficient defenses for journalists acting in good faith or those engaging in public interest reporting. This gap in legal protection discourages robust journalism (Olawuyi, 2017).

Prospects for Nigerian Journalists

The law of defamation in Nigeria, while presenting significant challenges, also holds prospects for improvement that could enhance the practice of journalism. These prospects include legal reforms, better protection mechanisms, judicial developments, and the role of professional organizations in advocating for journalists' rights.

1. Legal Reforms and Clarification

There is a growing call for legal reforms to provide clearer definitions and standards within defamation law. Reforms could include:

- **Clarification of Defenses:** Strengthening and clarifying defenses such as truth, fair comment, and public interest to protect journalists who report accurately and in good faith (Okonkwo, 2019).
- **Digital Media Provisions:** Updating laws to address the complexities of digital and online defamation, ensuring that protections extend to digital journalism (Akinwale, 2020).

2. Strengthening Judicial Protections: Judicial developments can play a significant role in shaping a more favorable environment for journalists. Potential judicial actions include:

- **Setting Precedents:** Courts can set important precedents by interpreting defamation laws in ways that protect freedom of expression and journalistic practice.
- **Expediting Legal Processes:** Efforts to streamline and expedite legal processes can reduce the burden on journalists facing defamation suits, ensuring quicker resolutions (Nwabueze, 2016).

3. Advocacy and Professional Support: Professional organizations and advocacy groups can help by:

- **Legal Assistance:** Providing legal assistance and resources for journalists facing defamation claims.
- **Training and Education:** Offering training programs on defamation law, helping journalists understand their rights and responsibilities, and how to navigate legal risks (Uko, 2018).

4. Public Awareness and Support: Increasing public awareness about the importance of press freedom and the role of journalists in democracy can create a supportive environment for legal reforms. Public support can influence policymakers to prioritize protections for journalists (Olawuyi, 2017).

5. International Influence and Best Practices: Adopting best practices from other jurisdictions and aligning with international standards can enhance the prospects for Nigerian journalists. Engaging with international human rights frameworks can help in advocating for stronger legal protections and reforms.

6. Technological Advancements: Leveraging technological advancements can aid in protecting journalists from defamation risks. Tools and platforms that help verify information and manage digital content can reduce the incidence of unintentional defamation (Akinwale, 2020). As well as conform with the assertion by Chukwu (2021) that fact-checking is salient and sine-qua-non to the effectiveness and efficacy of the media.

Conclusion/Recommendation

The study concludes that enormous inhibitions exist and that such may have frightening effects on journalists' ability to discharge its functions unfettered. Given the mammoth inhibitions identified, the study recommends legal reforms leading to stronger legal protections for journalists. Further, given the effect of the law of defamation on journalists in Nigeria, which has been said to restrict their freedom to access and disseminate information without fear, it is hereby recommended that journalists should undergo strategic training that will arm them with the requisite knowledge on how to disseminate information free from derogation of the law of defamation or navigate defamation, as well as strengthens their confidence level. As this will, in no small measure, assist the Nigerian journalists to hold government and powerful people accountable to the Nigerian society.

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