TOPE ADEBAYO LP

Holding the Line: A Practical Guide to Contempt Proceedings in Nigerian Courts

Vol I

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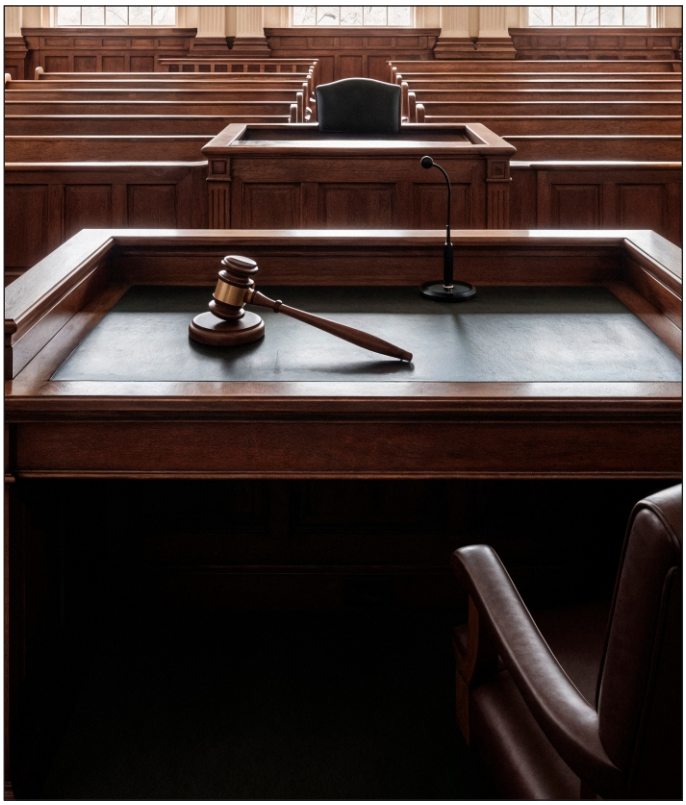
INTRODUCTION

After years of protracted litigation, repeated adjournments, and considerable legal expense, a litigant finally obtains a favourable judgment, positive order, or ruling from a court of competent jurisdiction.[1] The litigant holds the Certified True Copy (CTC) of the court's decision, relieved that justice has been served - but then the Nigerian reality sets in. The judgment debtor elects not to comply voluntarily with the order, judgment, or ruling of the court. Months stretch into years. In the interim, counsel to the successful party initiates enforcement proceedings, which often prove protracted and cumbersome, because the judgment debtor, or other party bound by the court order, has deliberately rendered both themselves and their assets unavailable or otherwise inaccessible.

The judgment, ruling, or injunctive order - representing the culmination of a hard-fought legal contest-may ultimately amount to a mere piece of paper with little or no significance. This is the common reality for thousands of successful litigants across Nigeria, where the issuance of a judgment or court order often fails to lead to effective enforcement or tangible compliance.

The above situation places the judiciary in a precarious position, for a judicial system that is unable to compel obedience risks degenerating into what the late Chief Gani Fawehinmi, SAN, and other commentators have aptly described as a "toothless bulldog": an institution that barks but cannot bite. [2] The ultimate consequence of this state of affairs is the gradual displacement of lawful adjudication by self-help, vigilante justice, and extra-judicial enforcement, a phenomenon that has become alarmingly prevalent in Nigeria.

Against this troubling backdrop, **committal proceedings and the inherent jurisdiction of the courts to punish for contempt** remain the judiciary's most



authoritative and effective mechanism for ensuring compliance with its orders. These powers serve not only as a means of compelling obedience but also as a critical instrument for preserving the authority, dignity, and integrity of the judicial process.

When properly invoked, such proceedings underscore that defiance of court orders has consequences and may result in imprisonment. Yet, in practice, even Nigeria's committal procedure is so convoluted, so riddled with loopholes, and so easy to evade that it has become almost toothless itself.

Our article on this subject is structured in two parts, to be published as Volumes I and II, and offers a comprehensive examination of committal proceedings for contempt of court in Nigeria. This piece constitutes Volume I. It interrogates the persistent procedural and institutional challenges that have rendered committal proceedings an increasingly ineffective tool for enforcing judicial orders, including the outdated statutory

1. Court judgment" (for the purposes of this article, includes all rulings and pronouncements of a competent court, whether monetary or non-monetary, including but not limited to: final judgments, interlocutory orders, injunctions, specific performance orders, and rulings).
2. Report on NHRC at 20. P2. https://www.nigeriarights.gov.ng/files/publications/NHRC_at_20_Report-Final_draft_2nd_December_2015.pdf

framework under the Sheriffs and Civil Process Act of 1945, the overlap and inconsistencies between the SCPA and extant court rules, and the practical difficulties faced by practitioners in initiating, prosecuting, and defending committal proceedings.

While Volume I focuses on the constitutional and jurisdictional foundations of committal proceedings, classifications of contempt, procedural frameworks, and systemic loopholes that frustrate enforcement, Volume II will build on this foundation to provide detailed case-law analyses, substantive enforcement strategies, illustrative practitioner guidance, and recommendations for legislative and procedural reforms. Across both volumes, the discussion contends that comprehensive reform is imperative for committal proceedings to reclaim their role as a credible and effective mechanism for safeguarding the authority of Nigerian courts.

CONSTITUTIONAL AND JURISDICTIONAL FOUNDATION FOR COMMITTAL PROCEEDINGS

The authority of Nigerian courts to punish contempt is derived from s**ection 6(6)(a) of the Constitution of the Federal Republic of Nigeria 1999** (as amended), which extends judicial powers to 'all inherent powers and sanctions of a court of law. [4] This constitutional provision establishes that the power to punish contempt is not merely statutory but fundamental to the judiciary's existence and functioning.

In *Atake v Attorney-General of the Federation*, [5] the Supreme Court provided an authoritative definition, describing contempt as '***any conduct which tends to bring into disrespect, scorn or disrepute the authority and administration of the law or which tends to interfere with and/or prejudice litigants and/or their witnesses in the course of litigation.***' The apex court further emphasized in Omoijahe v Umoru, [6] that "***it is justice itself that is flouted by contempt of court, not the individual court or judge who is attempting to administer it.***" These words underscore the fundamental rationale for why an affront to the court's integrity is treated with the utmost seriousness. Yet the uncomfortable truth remains: the constitutional authority of a superior court of record to punish for contempt will mean little if the procedural machinery for exercising it is broken.

Highlighting the antecedents of the challenges facing Nigeria's existing committal procedural frameworks includes the continued reliance on the Sheriffs and Civil Process Act, enacted in 1945 ("SCPA") during British colonial rule. Despite being over 8 decades old, this statute remains the primary legislation governing committal proceedings in Nigeria. The implications are stark: we are attempting to enforce judgments in an era defined by cryptocurrency, social media, and artificial intelligence, using procedural rules designed for telegrams and typewriters.

Following the above, we shall now proceed to address several critical aspects of the issue. The first port of call is to briefly analyze how contempt of court is categorized under Nigerian law and to evaluate whether the current classification poses any practical or conceptual challenges.

[3] Oko v. Aganyi (2012) LPELR-19704(CA) (Pp. 17-20 paras. C)
[4] Chapter 1, Section 6 Of the Constitution of the Federal Republic of Nigeria

(I) CONTEMPT IN FACIE CURIAE (CONTEMPT IN THE FACE OF THE COURT)

Contempt in facie curiae refers to contumacious conduct committed in the immediate view and presence of the court. [7] It typically involves insulting or abusive language, acts of violence, or any behaviour that disrupts, obstructs, or interferes with the orderly conduct of judicial proceedings. The Supreme Court affirmed it in *INEC v. Oguebego* [8] that "a superior court of record has the inherent jurisdiction to deal with contempt in facie curiae and punish for the offence summarily." This summary jurisdiction empowers the court to take immediate action against a contemnor without recourse to the more elaborate procedural safeguards applicable to contempt committed outside the court. However, the same decision underscores an important limitation: the summary power to punish for contempt must be exercised with restraint and "used sparingly and only in serious cases." [9] This caution reflects a long-standing judicial concern that proceedings for contempt *in facie curiae,* by their very nature, carry a heightened risk of arbitrariness if not carefully circumscribed.

The dangers inherent in the unrestrained exercise of this power were starkly illustrated in the widely publicised case involving human rights lawyer Inibehe Effiong, who, on 27 July 2022, was sentenced to one month's imprisonment by the Chief Judge of Akwa Ibom State, Hon. Justice Ekaette Obot. Mr Effiong, who appeared in court to defend a client in a libel action instituted by the State Governor, was committed to prison after objecting to the presence of armed security personnel in the courtroom and requesting the Chief Judge's recusal on grounds of alleged bias. [10] He was ordered to derobe and was immediately remanded at the Uyo Correctional Centre without being placed in the dock, formally charged, or afforded an opportunity to show cause. The incident, widely criticised by the Nigerian Bar Association and civil society organisations, raised serious concerns about due process and the proper limits of summary contempt jurisdiction. [11]

Earlier judicial authorities show that this is not an isolated concern. In *Adeyemi Candide-Johnson v. Mrs Esther Edigin*, [12] the Court of Appeal deprecated the conduct of an Acting Chief Magistrate who cited counsel for contempt and ordered his detention merely for insisting that his submissions be taken on record and declining to answer a question posed by the court. In setting aside the committal, the Court of Appeal observed that the Magistrate had exacerbated the situation by overreaching her authority when "tempers rose rather meteorically."

(II) CONTEMPT EX FACIE CURIAE (CONTEMPT OUTSIDE THE COURT)

Contempt ex facie curiae refers to contumacious conduct committed outside the immediate view and presence of the court. [13] It most commonly arises from wilful disobedience of court orders, rulings, judgments, or injunctive relief, as well as from acts calculated to obstruct or interfere with court officials in the execution of judicial processes or to prevent the administration of justice. [14]

The Court of Appeal articulated a distinction with clarity in *Attorney-General of Edo State & Anor v. Churchgate Industries Ltd & Anor,* [15] where it held that while contempt committed in the face of the court may be dealt with summarily, "***punishment for contempt committed ex facie curiae is criminal in nature and involves punishment of a person for his criminal act in relation to judicial process perpetrated outside the face of the court. A charge is therefore involved, a plea is necessary, and the accused is entitled to a fair hearing of the case brought against him.***"

5 Per Idigbe, J.S.C. (1982) LPELR-586(SC) (Pp.16 Paras. C-D)
6 (1999) 5 S.C. (Pt. 111) 14 at 23
7 Omoijahe v. Umoru & ors (1999) LPELR-2645(SC) (Pp. 10-13 paras. A)
8 [2018] 8 NWLR (Pp.101-102, paras. G-B)
9 ibid
10 Judge Jails Defense Lawyer in Libel Case, Detains Reporter" https://mfwa.org/judge-detains-reporter-jails-defense-lawyer-in-libel-case/
11 ibid
12 (1991) 1 N.W.L.R. (Pt. 129) 659
13 INEC & Anor v. Oguebego & Ors (2017) LPELR-42609(SC) (Pp. 12-14 paras. D)

CIVIL AND CRIMINAL CONCEPT

A further and well-established distinction in contempt jurisprudence is that between **civil contempt and criminal contempt.** As observed by the apex court in Awosanya v. Board of Customs & Excise, [16] a clear-cut distinction between a civil and a criminal contempt is often difficult to draw. [17] However, civil contempt commonly arises from a refusal to obey or comply with subsisting order of court. [18] It is, therefore, contempt in procedure, consisting essentially of disobedience to the judgments, orders, or other process of a court. [18]

By contrast, in relation to the nature of criminal contempt, the Supreme Court held in Omoijahe v. Umoru & Ors., [20] that criminal contempt of court may involve an interference with the due administration of justice either in a particular case or more generally as a continuing process. It is justice itself that is flouted by contempt of court, not the individual court or judge who is attempting to administer it. By implication, criminal contempt is similar to ordinary offences, such as theft. [21]

Put differently, civil contempt is concerned primarily with the disobedience of judgments or orders that occasion private injury, and the court's intervention is directed at compelling obedience and securing compliance with its orders. [22] Criminal contempt, on the other hand, is aimed at conduct that interferes with the administration of justice, impedes or perverts the course of judicial proceedings, and is punished in order to vindicate the authority of the court and protect the public interest. [23]

This classification, as outlined above, remains one of the most problematic and least coherent aspects of Nigerian contempt jurisprudence, particularly with respect to the hybrid character of contempt ex facie curiae. Nigerian courts have consistently described contempt ex facie curiae as quasi-criminal, or indeed criminal in nature, on the basis that it attracts the criminal standard of proof-**beyond reasonable doubt-**and may

result in custodial sentences upon conviction. [24] In practice, however, this characterisation has produced a fundamental doctrinal tension that continues to generate significant procedural and practical challenges:

(a) First, under both the applicable Rules of Court and the Sheriffs and Civil Process Act (SCPA), proceedings for contempt ex facie curiae are commenced and prosecuted by way of civil process, rather than through a formal criminal prosecution.

(b) Secondly, if contempt ex facie curiae is truly criminal in character and intended to vindicate a public interest, it is difficult to justify why such proceedings are ordinarily initiated and prosecuted by private litigants, rather than by the State through its prosecutorial authorities.

(c) Thirdly, the imposition of the criminal standard of proof-beyond reasonable doubt-places an onerous and arguably illogical burden on private citizens whose primary objective is the enforcement of subsisting civil judgments, rulings, or orders, rather than the punishment of offenders in the public interest.

14 Atake v. AG Federation & Anor (1982) LPELR-586(SC) (Pp. 39-42 paras. B-B)
15 (2016) LPELR-41439 (CA) Pp. 27-32, paras. C-D
16 (1975) LPELR-657(SC) (Pp. 16-17 paras. F)
17 ibid
18 Mohammed & Anor v. Olawunmi & Ors (1990) LPELR-1893(SC) (Pp. 42 paras. E)
19 ibid
20 (1999) LPELR-2645(SC) (Pp. 17 paras. A)
21 ibid

(d) Fourthly, even the courts themselves have acknowledged that the distinction between civil and criminal contempt is often elusive and difficult to maintain in practice. This raises a further and unresolved question: where a contemnor disobeys an injunctive order, does such conduct amount to civil contempt-by reason of the private injury suffered by the beneficiary of the order-or criminal contempt, as an affront to the authority of the court? The answer to this question has profound procedural consequences, yet the law offers no clear or consistent guidance.

The uncomfortable reality is that Nigerian contempt legal framework seeks to combine the procedural flexibility of civil enforcement with the coercive severity of criminal actions. It demands private enforcement yet imposes criminal penalties. These internal contradictions have rendered the regime unduly complex, procedurally uncertain, and susceptible to technical manipulation, thereby undermining the effectiveness of contempt proceedings as a reliable mechanism for enforcing judicial authority.

THE CRIMINAL CHARGE CONUNDRUM

As stated above, committal proceedings have traditionally been described as "**quasi-criminal**" in nature; [25] however, in several decisions, Nigerian courts have effectively dispensed with the "quasi" qualifier and treated such proceedings as fully criminal in character, particularly in cases of **contempt ex facie curiae.**

As far back as 1970, in **Ene Ene Oku v. State,** [26] the Supreme Court articulated the applicable procedural distinction in the following terms:

> "***The power to punish summarily for a contempt in the face of the court is undoubted and when contempt is committed in facie curiae a superior court of record is entitled to prevent brevi manu any attempt to interfere with the administration of justice... Where contempt is punishable brevi manu in court no warrant is necessary for the apprehension of the offender as he is always in court and the contempt is stated to have been committed coram judice. In other cases the proper procedure of apprehension, arrest, charge and prosecution, etc., must be followed.***"

Nearly five decades later, the Supreme Court again reinforced this position in **INEC v. Oguebego,** [27] where in delivering the lead judgment, Hon. Justice Nweze, JSC (of blessed memory) stated:

> "***Here, I take liberty to restate that there are two broad classifications of contempt - that committed in facie curiae and that committed ex facie curiae. In the latter category, a charge and a plea are necessary and the accused is entitled to a fair hearing of the case against him. In both types of contempt, a trial is involved... What separates one from the other is the procedure to be adopted."***

Manifest from the above position of the law, as stated by the apex court, is that where contempt is committed ex facie curiae, a criminal charge must be preferred, and the machinery of arrest, prosecution, and trial must be engaged. This position, however, raises serious constitutional and practical concerns and arguably renders the enforcement or compelling the obedience of court orders or judgments even more onerous than it already is. If contempt ex facie curiae requires a criminal charge, arrest, and prosecution, a fundamental question arises: **does contempt ex facie curiae exist as a clearly defined statutory offence under Nigerian law, and, if so, where are its constituent elements and prescribed punishment expressly provided for?**

22 Ezekiel-Hart v Ezekiel-Hart (1990) 2 SCNJ Page 1 at 2
23 ibid
24 ibid
25 Ejembi v. A.-G., Benue State [2003] 16 NWLR P. 376, paras. C-G ; A.-G., Anambra State v. Okeke [2002] 12 NWLR P.615, paras. B-C
26 (1970) A.N.L.R. (Rep.) 62 at 68 & 70
27 (2018) 8 NWLR (Pt. 1620) 88 at 101 Paragraph F-G
28 Cap C38 LFN 2004
29 Cap P53 LFN 2004

To interrogate this question, it is necessary to take another detour into the Nigerian criminal legislation.

Section 6 of the **Criminal Code Act** [28] provides as follows:

> "***Nothing in this Act or in the Code shall affect the authority of courts of record to punish a person summarily for the offence commonly known as contempt of court; but so that a person cannot be so punished and also punished under the provisions of the code for the same act or omission.***"

Similarly, Section 6 of the **Penal Code** [29] contains a materially identical provision. These sections do not, of themselves, create offences of contempt; rather, they preserve the inherent authority of superior courts of record to punish contempt.

However, Section 133 of the **Criminal Code Act** proceeds to define certain acts amounting to contempt, including the following, which may be relevant to contempt ex facie curiae:

a) Any person who having been called upon to give evidence in a judicial proceeding, fails to attend or produce a document; [30]

b) Any person who re-takes possession of land from any person who has recently obtained possession by a writ of court; [31]

c) Any person who commits any other act of intentional disrespect to any judicial proceeding, or to any person before whom such proceeding is being had or taken. [32]

While paragraphs (a) and (b) address specific and easily identifiable scenarios, paragraph (c) employs language of striking breadth and ambiguity. This raises an immediate and troubling question: **what precisely constitutes "intentional disrespect" within the meaning of the section?**

If a judgment debtor or a party in a suit disobeys a court order or judgment directing the payment of money or the delivery of property, does such conduct amount to "disrespect," or is it merely non-compliance? If a judgment debtor or a party in a suit publicly criticises or expresses disagreement with a court order, ruling, or judgment, does that constitute intentional disrespect to the judicial proceeding? What if the debtor genuinely believes that the order was wrongly made and intends to challenge it on jurisdictional grounds or on appeal-does honest disagreement translate into criminal contempt? How is the incidence of "intentional disrespect" determined?

More troubling still is the requirement of intentionality. In prosecuting an alleged contempt that does not fall within the specific scenarios enumerated in Section 133, must the prosecuting agent now prove not only that the court order was disobeyed, but also that the disobedience was carried out with the **specific intention to disrespect the court?** What happens where the alleged contemnor argues that, although the act may appear disrespectful, it was not intentional-perhaps arising from negligence, misunderstanding, or a bona fide belief in a right to challenge the order? These questions are not merely academic; they are of profound practical significance, yet Section 133 offers little guidance on how such disputes are to be resolved.

The absurdity deepens further. Are parties now expected to shoulder the burden of defending the dignity and authority of the court by proving "disrespect," or is the primary obligation of the court to protect the legal rights of successful litigants by enforcing its judgments in their favour? While it is well understood that the protection of institutional authority is paramount in cases of contempt in facie curiae, the position in contempt ex facie curiae appears far less settled. Should the interests of parties not occupy a central place in the enforcement process?

30 Section 133(2) of the Criminal Code Act
31 Ibid. Section 133(8)
32 Ibid. Section 133(9)

Regrettably, the Administration of Criminal Justice Act 2015 offers little assistance. It only expresses reference to contempt that appears in relation to perjury under Section 347, a species of contempt in facie curiae that is dealt with summarily. It provides no clear procedural or substantive guidance for contempt ex facie curiae arising from the disobedience of court orders.

THE DOCTRINAL CONFLICT

The vagueness inherent in the criminal law in this context creates a direct collision with section 36(12) of the Constitution of the Federal Republic of Nigeria 1999 (as amended), which provides that "***a person shall not be convicted of a criminal offence unless that offence is defined and the penalty therefor is prescribed in a written law.***" Emphasis must be placed on the word "***defined.***" The Constitution does not require that an offence be merely mentioned or alluded to in a written law; rather, it must be clearly and specifically delineated so that a person of ordinary intelligence is able to ascertain, in advance, the conduct that is prohibited.

Measured against this constitutional standard, the expression "intentional disrespect" in section 133(9) of the Criminal Code Act falls conspicuously short. The language of the provision is so expansive and indeterminate that almost any conduct may be argued either to fall within its ambit or to fall outside it, depending largely on forensic ingenuity. The law, however, must be certain and predictable; it cannot operate as a speculative exercise in which every act of non-compliance is subjected to post hoc judicial interpretation to determine whether it satisfies an undefined threshold of "intentional disrespect."

It is not in doubt that the superior courts derive their power to punish for contempt from section 6(6)(a) of the Constitution. However, by insisting that contempt ex facie curiae must be prosecuted through the full rigors of the criminal process, the courts have, in effect, converted an inherent and protective jurisdiction into proceedings that bear all the hallmarks of a conventional criminal trial.

THE CORRECT PROSECUTING AUTHORITY

This analysis brings to the fore another thorny issue: if contempt ex facie curiae is truly a criminal offence, as recent judicial characterisations suggest, who is the proper prosecuting authority? Orthodox criminal procedure would dictate that prosecution should lie exclusively with the state-acting through the Attorney-General of the Federation, the Attorney-General of a State, the Police, or duly authorised special prosecutors such as legal officers of the EFCC or INEC. [33] Where a private individual seeks to prosecute, the traditional requirement is to obtain a fiat from the Attorney-General.

[33] Oko v. Aganyi (2012) LPELR-19704(CA) (Pp. 17-20 paras. C)
[34] Chapter 1, Section 6 Of the Constitution of the Federal Republic of Nigeria

The practical reality, however, departs sharply from this model. Proceedings for contempt ex facie curiae are routinely initiated by private citizens, most commonly judgment creditors or parties who are beneficiaries of a positive order of court made in a suit seeking to compel compliance with court orders. This immediately raises a doctrinal difficulty: ***how are private individuals able to commence such proceedings without the Attorney-General's fiat if contempt is indeed a criminal matter?***

A partial answer appears in the recent decision of the Supreme Court in ***Raphael Obijiaku v. Chief Joe Obijiaku & 2 Ors,*** [34] where the Court held that, by virtue of section 301(1) of the Administration of Criminal Justice Law of Anambra State 2010, private citizens may prosecute criminal matters without the fiat of the Attorney-General of the State. On the face of it, this resolves the problem-at least within Anambra State-by permitting private prosecution of committal proceedings under the state's criminal law framework.

However, the relief is geographically limited. The position applies only in Anambra State and, at best, a handful of other states with comparable provisions in their Administration of Criminal Justice Laws. In jurisdictions such as Lagos, Rivers, and Kano States, private prosecutions still require the Attorney-General's fiat. For parties or judgment creditors in these states, enforcing court orders through contempt proceedings becomes unwieldy and fragmented. They must now navigate multiple procedural layers: involving the police, initiating a formal criminal charge, and securing the Attorney-General's discretionary consent.

The resulting jurisprudence exposes a deeper conceptual inconsistency. If contempt were truly a crime in the same sense as murder or theft, its prosecution would be uniformly controlled by the state through the Attorney-General across the federation. This is the defining feature of criminal offences in Nigerian law: the state asserts that the conduct in question is injurious to society at large and therefore warrants public prosecution and punishment. Contempt, by contrast, is frequently enforced through proceedings initiated and driven by private individuals for their own benefit.

If the legal system is comfortable with private parties invoking coercive sanctions-potentially including loss of liberty-to secure compliance with judgments, orders, or rulings for private benefit, this strongly suggests that contempt ex facie curiae does not sit comfortably within the orthodox criminal law paradigm. Rather, it appears to function as a civil enforcement mechanism clothed in criminal procedure.

Indeed, traditional civil enforcement tools-such as writs of fieri facias and garnishee proceedings-are initiated and pursued by private parties for private benefit. If contempt operates in the same manner, then its description as "criminal" or "quasi-criminal" becomes largely semantic rather than substantive.

CONCLUSION

Until the Supreme Court provides definitive guidance or the National Assembly reforms the SCPA, practitioners and litigants must navigate a procedural maze fraught with technical pitfalls, leaving committal proceedings vulnerable to manipulation and limiting their effectiveness as a tool for enforcing court orders. Volume II will build upon this foundation to explore practical enforcement strategies, illustrative case law, comparative perspectives, and recommended legislative reforms to strengthen Nigeria's committal regime.

1 Brundtland, G. H. (1987). Report of the World Commission on Environment and Development: Our common future (United Nations General Assembly Document A/42/427). United Nations.

2 ibid

3 ibid

4 Remeur, C. (2020, January). Understanding environmental taxation (EPRS Briefing No. PE 646.124). European Parliamentary Research Service. https://www.europarl.europa.eu/RegData/etudes/BRIE/2020/646124/EPRS_BRI(2020)646124_EN.pdf (assessed 21st September 2025).

5 Brundtland, G. H. (1987) op cit.

6 Ali, K., et al. (2023). Evidence of five sustainable economies: Environmental taxation, renewables, and carbon emissions. Environmental Research Letters, 18(11), 115004. https://pmc.ncbi.nlm.nih.gov/articles/PMC10681941/ (assessed 15th September 2025)

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