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An Examination of the Sphere of Power of the State and Federal Legal Adviser under the Nigerian Party System: A Review of *Akawo v PDP & Ors*

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SCAN ARTICLE

An Examination of the Sphere of Power of the State and Federal Legal Adviser under the Nigerian Party System: A Review of *Akawo v PDP & Ors*

Benson Ayodele Oloworaran*

Abstract

The validity of the constitution and guidelines of political parties necessary for their internal governance and party structure is constitutionally recognised. Such constitutions and guidelines regulate their domestic affairs, ensure internal democracy and preserve the federal character template of the Constitution of the Federal Republic of Nigeria. However, the supremacy of a political party's constitution and the independence of organs created there under within their sphere of authority has always been a subject of controversy, especially between the state legal officer and the national legal officer. This issue arose in the case of Akawo v PDP & Ors as to the implications of the bifurcation of powers between the various strata of authorities established under the Constitution of the Peoples Democratic Party. Employing the doctrinal approach, this paper reviews the decision in that case and concludes that the decision deepens and entrenches internal democracy of parties as well as prevents arbitrariness and usurpation of the power of one office by another within the party.

Keywords: Examination, Power, Legal Adviser, Party System

Introduction

The ability of a person to act or represent another is not new in human relationship. It is an idea that grew out of convenience and necessity. Before a person can act or represent another, the authority of the person represented is always necessary. Legal representation, within the context of this paper is the provision of legal services to a person by a professionally qualified legal practitioner. This is always taken to be very important as the quality of representation would impact the rights, liabilities and image of the person represented. For natural persons, except in certain cases in criminal matters like offences punishable with capital punishment, legal representation is most often by choice, but for bodies corporate, it is a necessity as such bodies possess no natural ability to represent themselves.

In Nigeria, issues of legal representation have generated much discord and open contention in several cases.¹ Within political structures, legal representation has been a critical issue because of conflicting interests within political parties. To curb such discord and similar contentions; issues of legal representation are treated as the domestic affairs of a political party and hence, the constitutions of political parties always ensure the bifurcation of legal powers and authorities within the strata of its organisation as this facilitates coordination and coherency.

The validity of the constitution and rules of political parties necessary for their internal governance and party structure is constitutionally provided for and recognised.² Accordingly, all political parties within the Nigerian polity are governed by their various party constitutions and guidelines which regulate their domestic affairs and ensure internal democracy. The supremacy of such instruments over the members, organs and officers³ of the political body is always subject only to the Constitution of the Federal Republic of Nigeria and other laws relevant to electoral processes and legal representation. The issue that arose in the case of *Akawo v PDP & Ors*⁴ is the implications of the bifurcation of powers between the various strata of authorities established under the Constitution of the Peoples Democratic Party.

Specifically relevant is the case's exhaustive consideration of the legal issues under scrutiny in this paper; that is, the separate sphere of power of the State and Federal Legal Adviser of a political party under the Nigerian legal system. This paper accordingly reviews the case of *Akawo v PDP & Ors* to, amongst others, amplify the importance of the party Constitution on issues affecting the domestic affairs of the party and further to ascertain the rationale behind the bifurcation of powers, in this case, powers of the legal advisers, amongst the various strata of political representation.

The Legal Framework and Rationale for Legal Representation in Nigeria

The constitution recognizes the right of a litigant to represent himself or by a counsel.⁵ By virtue of section 36 of the Constitution of the Federal Republic of

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¹ *F.R.N v Abiola* (1997) 2 NWLR (Pt. 488) 444

² Constitution of the Federal Republic of Nigeria, 1999 (as amended) Cap C23 LFN 2004 (CFRN) s 223.

³ Peoples Democratic Party Constitution art 2; All Progressive Congress Constitution 2014 art 2; Labour Party Constitution art 7; and APGA constitution art 7.

⁴ Suit No: FHC/ABJ/CS/112/2023, Decision of the Federal High Court, Abuja Division, per Ekwo J delivered on the 20th day of September 2023.

⁵ *Kubau v Rilwanu* (2014) 4 NWLR (Pt. 1397) 284.

Nigeria 1999, every party to a case has an unfettered right to representation by counsel of his choice. In addition, Rules of court may also amplify this right by granting or permitting legal practitioners to appear for any party in the case before it.⁶In *Fawehinmi v N.B.A. (No.1)*,⁷ the court held that the Legal Practitioners Act, 1975, grants all persons the right to be represented by a legal practitioner in all courts of law sitting in Nigeria, unless there is a law restricting or prohibiting the right of any person to be represented by a legal practitioner.

The essence of legal representation is to help the litigant to articulate his case, stating the rules and principles of law that would persuade the court to rule in his favour.⁸Suffice to state that representation by a legal practitioner may not be limited to issues in the law court, but extend to every issue upon which professional knowledge becomes necessary for any decision to be taken, whether formally or informally. This much is recognised by the Constitution of political parties, in this case, the Constitution of the PDP, wherein the office of the party legal adviser was established as an office requiring professional qualification.

The right to legal representation could be diverse, and distinct depending on the situation and the relevant facts. In criminal matters, even though a defendant may represent himself; legal representation by a legal practitioner is mandatory in cases where conviction could carry a corporal punishment. In *Nwambe v State*,⁹ the court concluded that representation by a legal practitioner at the trial of any person accused of a criminal offence is one of the fundamental rights guaranteed by section 33 of the 1979 Constitution (now section 36). If therefore, a charge consists of a capital offence and the accused is not represented by a counsel of his choice, the court has a statutory duty to provide such representation.¹⁰ In civil matters, it could be dispensed with by the litigant who may elect to represent himself; even though representation by a legal practitioner is desirable. As Ojage JCA counselled in *Alamona v Bida*,¹¹

Now it is indisputable that proceedings in a court of law particularly in the High Court of Justice is not for the uninitiated. No matter how versed in the other fields of human endeavour a person may be, a person not

⁶*Ebe v C.O.P* (2008) 4 NWLR (Pt. 1076) 189 at 217, paras. A-D.

⁷*Fawehinmi v. N.B.A. (No.1)* (1989) 2 NWLR (Pt. 105) 494 at 531, para. D.

⁸*Adebisi v Umar* (2012) 9 NWLR (Pt. 1305) 279 at 296, paras. B-D.

⁹*Nwambe v State* (1991) 3 NWLR (Pt. 384) 385 at 403, paras. E-F.

¹⁰*Nemi v State* (1994) 10 SCNJI at 3; (1994) 9 NWLR (Pt. 366) 1.

¹¹*Alamona v Bida* (2000) 8 NWLR (Pt. 668) 186 at 193.

trained in the ordered lessons of legal practice cannot understand let alone follow the intricacies of the law of evidence if confronted in a court of law. The lawyer, no, the barrister at law who is trained in this field is called learned. How then can a person however endowed in common sense be successfully pitted against a trained barrister at law? The other party is disadvantaged. It is however not the duty of the court to do more than be an umpire.

In the case of corporate bodies however, representation by a legal practitioner becomes necessary as the body corporate can only act through natural persons; and could be mandatory where it is stated by law to be a requirement for an office within the corporate body or a standard necessary for certain representation.

The choice of who represents a legal personality is that of the personality to decide. However, there are instances where issues of who is the rightful legal representative of a person have generated controversy.¹² Such controversies may take various forms. First and more common is where two counsel or more contend to represent the same party in a proceeding. Where this arises, the court has held that it can be resolved through a number of means. In *FRN v Abiola*,¹³ the court asserted that such a controversy may be settled between the counsel and the party to be represented. The court was of the opinion that the:

[T]ime honoured practice is for this issue of representation to be decided by counsel after consulting the appellant, or the appellant writing to intimate his choice of counsel or by any other means e.g. Affidavit showing who will be his counsel. It is always a privilege, the matter of Counsel - Client relationship, and I do not believe it is right to involve the court in this.

In cases involving a corporation, government entity and institutions, however, a second scenario and more complicated one may arise as to which organ, tier or strata of the institution is possessed of the power and capacity to represent or elect who represents such institutions. It was in this second context that the issue of representation arose in the case of *Akawo v PDP and Ors*,¹⁴ which is addressed by this paper.

Facts of the Case

¹²*F.R.N v Abiola* (1997) 2 NWLR (Pt. 488) 444 *per* Kalgo, J.C.A. at 464-465, paras. H-A.

¹³*Ibid.*

¹⁴(n 4)

By an amended Originating Summons dated 9th March 2023; the Plaintiffs sought for the determination of the following questions:

1. Whether having regard to the provisions of Section 223 of the Constitution of the Federal Republic of Nigeria 1999 (as amended) and Article 47 (1) of the Constitution of the Peoples Democratic Party (as amended in 2017) the Plaintiff who was elected as Chairman and the other members of the State Executive Committee, the Local Government Area Executive Committees and the Ward Executive Committees of the Peoples Democratic Party so elected and sworn-in pursuant to the Peoples Democratic Party State Congress which held in Rivers State on the 21st day of March, 2020 are not entitled to serve out their four (4) year term which expires on or about 22nd May, 2024?
2. Whether the 1st and 2nd Defendants can unilaterally and without reasonable cause dissolve the State Executive Committee, the Local Government Area Executive Committees and the Ward Executive Committees respectively of the 1st Defendant in Rivers State or truncate their tenure as guaranteed by Article 47(1) of the 1st Defendant's Constitution and Section 223(1) and (2) of the Constitution of the Federal Republic of Nigeria, 1999 (as amended) before the expiration of their four (4) year term which expires on or about 22nd May, 2024?
3. Whether upon a proper interpretation of the provisions of Article 46(1) and Articles 35, 36, 37, 38, 39, 40, 41, 42, 43 and 44 of the Constitution of the Peoples Democratic Party (as amended in 2017), the members or the officers of the Rivers State Chapter of the Peoples Democratic Party, that is, members of the State Executive Committee, Local Government Areas Executive Committees and Wards Executive Committees of the 1st Defendant (PDP) in Rivers State, the Plaintiff in this matter, are not entitled to exercise and perform the corresponding powers, functions and roles of the National Officers of the 1st Defendant in so far as those powers, functions and roles relate to matters affecting the 1st Defendant or the 1st Defendant's interest in Rivers State or relate to matters arising from the activities of the 1st Defendant in Rivers State?
4. As an alternative to question 3 above, whether upon a proper interpretation of the provisions of Section 36(1) of the Constitution of the Federal Republic of Nigeria 1999 (as amended), Article 46(1) and Article 42 of the Constitution of the Peoples Democratic Party (as amended in 2017), the powers functions and role of the office of the National Legal Adviser, that is, the National Legal Adviser and the Deputy National Legal Adviser or indeed the office of the 2nd Defendant on record or any member of the National

Working Committee or the National Executive Committee of the 1st Defendant can be exercised in such a manner as to deny the State Legal Adviser for Rivers State of the 1st Defendant, the right to represent or the right to appoint a Legal Practitioner or Legal Practitioners to represent the Rivers State Chapter of the 1st Defendant or indeed the 1st Defendant or any of its elected candidates in respect of any matter arising from Rivers State or pertaining to the interest of the 1st Defendant in Rivers State especially at such a time when members of the State Executive Committee, Local Government Areas Executive Committees and Wards Executive Committees of the 1st Defendant in Rivers State (Rivers State Chapter) are in dispute with the 2nd Defendant or the National Officers, or National Working Committee or the National Executive Committee of the 1st Defendant?

It was based on the above that the Plaintiffs sought for numerous reliefs; two of which are particularly relevant to this paper, that is, reliefs 5 and 7. They read as follows:

5. A DECLARATION that the powers, functions and role of the office of the National Legal Adviser of the 1st Defendant, that is, the National Legal Adviser and the Deputy National Legal Adviser or indeed the person or office of the 2nd Defendant on record or the members of the National Working Committee and/or the National Executive Committee of the 1st Defendant are not entitled to and cannot exercise any of their powers or perform any of their functions or play any of their roles in such a manner as to deny the State Legal Adviser for Rivers State of the 1st Defendant the right to represent or the right to appoint a Legal Practitioner or Legal Practitioners to represent the Rivers State Chapter of the 1st Defendant or indeed the 1st Defendant in respect of any matter arising from Rivers State or pertaining to the interest of the 1st Defendant in Rivers State or arising from the activities of 1st Defendant in Rivers State especially at such a time when members of the State Executive Committee, Local Government Areas Executive Committees and Wards Executive Committees of the 1st Defendant are locked in dispute with the 2nd Defendant or the National Officers, or National Working Committee or the National Executive Committee of the 1st Defendant.
7. AN ORDER OF INJUNCTION restraining the 1st and 2nd Defendants either by themselves or by their servants, agents or privies (including the office of the National Legal Adviser, the Deputy National Legal Adviser and all other officers of the 1st

Defendant comprising the members of the National Working Committee and/or the members of the National Executive Committee of the 1st Defendant from denying the State Legal Adviser for Rivers State of the 1st Defendant the right to represent or the right to appoint a Legal Practitioner or Legal Practitioners to represent the Rivers State Chapter of the 1st Defendant or indeed the 1st Defendant in respect of any matter arising from Rivers State or pertaining to the interest of 1st Defendant in Rivers State or arising from the activities of 1st Defendant in Rivers State, including but not limited to pre-election matters and election petitions or in any manner howsoever appropriating to themselves individually or collectively, the exercise of powers, performance of functions or playing of any role corresponding to the National offices held by them as it pertains to the Rivers State Chapter of the 1st Defendant and/or in respect of any matter arising from Rivers State or pertaining to the interest of the 1st Defendant in Rivers State or arising from the activities of 1st Defendant in Rivers State including, and particularly, an order restraining the 1st and 2nd Defendants by themselves or through the National Legal Adviser, the Deputy National Legal Adviser or any of the officers in the office of the National Legal Adviser from interfering with the role of the State Legal Adviser for Rivers State of the 1st Defendant in the exercise of his powers to represent the 1st Defendant or to appoint Legal Practitioner or Legal Practitioners to represent the Rivers State Chapter of the 1st Defendant or the 1st Defendant in respect of any matter arising from Rivers State or pertaining to the interest of the 1st Defendant in Rivers State or arising from the activities of 1st Defendant in Rivers State including but not limited to representing the 1st Defendant or appointing Legal Practitioner or Legal Practitioners in respect of pre-election matters or election petition matters pertaining to the elections held in Rivers State.

Decision of Court

Key consideration of the court in reaching its decision is the provisions of the relevant laws and the Constitution of the PDP. The Court considered the provisions of Articles 2, 46(1) and 47(1) and (3) of the PDP Constitution. The said Articles provide as follows:

Article 2

Subject to the provisions of the Constitution of the Federal Republic of Nigeria and any other law in force, this Constitution shall be supreme and its provisions shall have binding force on all members and organs of the party.

Article 46 (1)

Except where the provisions of this Constitution state otherwise, all other officers at the Zonal, State, Local Government Area and Ward levels shall, in relation to their respective functions, have the same powers as their corresponding National Officers.

Article 47 (1) and (3)

(1) All National, Zonal, State, Local Government Area and Ward Officers of the Party shall hold office for a term of four years and shall be eligible for re-election for another term and no more.

(2)

(3) A vote of confidence may be moved on any member of the Executive Committee of the Party at any level at any National Convention or Congress of the Party two years into the tenure of such member of the Executive Committee, and where such a vote fails to be carried, the Executive Committee member shall be replaced at that National Convention or Congress, as the case may be, provided that two months' notice of such vote of confidence motion shall be given to the Party Secretary at the appropriate level, who shall circulate it to the relevant chapters one month before the National Convention or Congress, as the case may be

Further reliance was placed on section 223(1)(a) and (2)(a) of the 1999 Constitution (as amended) which provides:

- (1) The Constitution and rules of a political party shall-
 - (a) Provide for the periodical election on a democratic basis of the principal officer and members of the executive committee or other governing body of the political party.
- (2) For the purposes of this section-
 - (a) The election of the officers or members of the executive committee of a political party shall be deemed to be periodical only if it is made at regular intervals not exceeding four years.

Relevant to this paper is the second issue resolved by the court, which relates to legal representation. The contention of the plaintiff is that it has always been the practice for the State Chapter of the PDP through the State Legal Adviser to appoint and pay lawyers and to defend all elected candidates of the Party from the State at the Tribunal. Reliance was placed on Article 46(1) of the PDP Constitution. While the 1st and 2nd Defendants did not deny the

averments of the Plaintiff on this issue, they contended that Article 46(1) of the PDP's Constitution which they tendered as Exhibit A4 gives equal right to all its officers at all levels with their corresponding National Officers.

The court treated the position of the 1st and 2nd Defendants as an admission and hence demanded no further proof from the plaintiff on the issue.¹⁵ The court then held as follows:

Now, in the said Article 46(1) of the PDP's Constitution, it is provided that except where the provisions of the Constitution state otherwise, all other officers at the Zonal, State, Local Government Area and Ward levels shall, in relation to their respective functions, have the same powers as their corresponding National Officers. I find that the provision is clear and lucid. Where such is the case, the standard of interpretation is well established; see *Ogbuniyi v Okudo* (1979) 6-9 SC 24 at 35 where it was stated that:

One of the cardinal rules of construction of written instruments is that the words of a written instrument must in general be taken in their ordinary sense notwithstanding the fact that any such construction may not appear to carry out the purpose which it might otherwise be supposed was intended by the maker or makers of the instrument. The rule is that in construing all written instruments the grammatical and ordinary sense of the words should be adhered to, unless that would lead to some absurdity or some repugnancy or inconsistency with the rest of the instrument; the instrument has to be construed according to its literal import unless again there is something else in the context which shows that such a course would tend to derogate from the exact meaning of the words.

I find that Article 46(1) of the PDP's Constitution, gives all other officers at the Zonal, State, Local Government Area and Ward levels, in relation to their respective functions, the same powers as their corresponding National Officers. The deduction from this is that the State Legal Adviser can perform at the State level all the functions that the National Legal Adviser performs at the National level. Therefore, the State Chapter through the Legal Adviser has a mandate to appoint and pay lawyers and to defend all elected candidates of the Party from the State at the Election Tribunal. As it is, by the provision of Article 46(1) of the Constitution of the 1st Defendant, the National

¹⁵*Chukwu & Ors v Akpelu* (2013) LPELR-21864 (SC)

Legal Adviser is not given any role where the State Chapter through Legal Adviser has decided to perform this function and I so hold.

Rationale for the Decision

Even though a political party as a juristic person is a single entity;¹⁶ the bifurcation of power amongst its organs and strata is distinct and mutually exclusive. Politics is local; and power, if it must be beneficial to the people must also be donated exclusively to organs and bodies within a political party in a manner that such organs can act and operate independent of unnecessary influences within the party. That is the essence of party internal democracy entrenched as a principle in the PDP Constitution. In a federation, power often devolves in a manner that secures independence for the different tiers and strata of units within the federation. The beauty of the PDP constitution is the entrenchment of the federal democratic tenants, designed to entrench internal democracy, independence and efficacy within the party. Certain issues are important to the note in the decision of the court.

Supremacy of the Constitution of the Political Party

A registered political party is possessed of legal personality with perpetual succession and a common seal.¹⁷ The party is empowered to sue and may be sued in its corporate name.¹⁸ In addition, the political party is a voluntary association;¹⁹ her members are bound by its constitution²⁰ and any action taken which is not in conformity with the constitution of such political party is null and void and of no effect.²¹

In essence, the rights and obligations of the members of a political party are defined by their party's constitution.²² Such constitutions and guidelines made by members of political parties to regulate the conduct of their affairs and those of their members; once made and agreed upon,²³ are binding on the respective political parties and their members and courts will not allow a political party to act arbitrarily, nor will it allow a member of

¹⁶*Ihedioha v Nwosu* (2020) 5 NWLR (Pt. 1717) 291 at 314-315, paras. E-B; F-G.

¹⁷*Obasanjo v Buhari* (2003) 17 NWLR (Pt. 850) 510.

¹⁸*Fayemi v Oni* (2009) 7 NWLR (Pt. 1140) 223 at 255.

¹⁹*Aliyu v Namadi* (2023) 8 NWLR (Pt. 1885) 161 at 205.

²⁰*Emenike v P.D.P* (2012) 12 NWLR (Pt. 1315) 556.

²¹*Aguma v A.P.C.* (2021) 14 NWLR (Pt. 1796) 351 at 398, paras. B-G; *A.P.C v Karfi* (2017) 16 NWLR (Pt.1592) 457.

²²*Oshiomhole v Salihu* (No.2) (2021) 8 NWLR (Pt. 1778) 380; *Gana v. S.D.P* (2019) 11 NWLR (Pt. 1684) 510.

²³*Erue v Okotie-Eboh* (2017) LPELR-42; *Tarzoor v Ioraer* (2016) 3 NWLR (Pt. 1500) 463; *Uzodinma v Izunaso* (No.2) (2011) 11 NWLR (Pt. 1275) 30.

a political party to disobey the Constitution and Guidelines of his own political party.²⁴ Where the constitution is clear of certain issues, it must be given effect. The court in *Akwo's* case rightfully decided that the constitution of the PDP intends that the office of the National Legal Adviser and that of the State Legal Adviser are mutually exclusive and that each functions independent of the other.

5.2 The Need for Internal Democracy in a Political Party

Courts avoid making decisions on the internal affairs of a political party especially in areas of choice of candidates to contest political offices. But where the appropriate jurisdiction of a court is properly invoked, for instance, on the interpretation of certain parts of a political party's constitution, the court is duty bound to respond and insist that the party's constitution must be obeyed. This is to avoid arbitrariness, impunity and illegality.²⁵ Where the interpretation of certain portions of the constitution is in issue, the jurisdiction of the court would be properly invoked.

No constitution of a political party can oust the jurisdiction of a court of law. A political party's constitution cannot be superior to the 1999 Constitution of the Federal Republic of Nigeria to the extent of ousting the jurisdiction of the court vested by sections 35 and 87 of the Electoral Act, 2010 (as amended).²⁶ The Constitution of the Federal Republic of Nigeria is supreme and soars far above the constitution and regulations of a political party. Thus, any section of the constitution of a political party or its regulations which seeks to oust the jurisdiction of a court duly conferred by the Constitution of Nigeria and other statutes made pursuant thereto is null and void to the extent of its inconsistency.²⁷

Bifurcation and Independence of Power Within a political party

As earlier stated, the constitution of a political party is supreme. Extant electoral legislation in Nigeria promotes party system adhering to the dictates of internal democracy, which stipulates that organs within a party must be determined periodically by a transparent, free and fair manner that represents the voice and views of the members of the party. It also promotes a system that secures for the party officers, independence and freedom to exercise powers

²⁴*Oshiomhole v Salihu* (No.1) (2021) 8 NWLR (Pt. 1778) 237 at 269, paras. C-F.

²⁵*Oshiomhole v Salihu* (No.2) (2021) 8 NWLR (Pt. 1778) 380.

²⁶*Boko v Nungwa* (2019) 1 NWLR (Pt. 1654) 395 at 435, para. D.

²⁷*Ibid, First Bank of Nigeria Plc v T.S.A. Industries Ltd* (2010) 15 NWLR (Pt. 1216).

reserved for their office. The PDP constitution represents an ideal projection of this.

Conclusion

The court rightly interpreted the PDP constitution to give autonomy to the State Legal Officer within his sphere to exercise the powers reserved for the office by the constitution. A literal interpretation of the said PDP constitution reveals that offices created there under are purposefully established to function within their respective jurisdiction. Any attempt therefore by the National Legal Adviser to impede the powers of the State Legal Adviser within his sphere would amount to usurpation and would injure the dictates of the constitution. This paper is of the view that the provisions of the constitution of PDP represent a good adherence to the principles of internal democracy in the party. Local officers who understand and appreciate the needs within the locality can make decisions without being muzzled by National Officers who may not have firsthand knowledge of the local situation.



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