

Media Law and Investigative Journalism Practices in Nigeria

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Abstract

This paper x-rayed the impact of media laws on investigative journalism practices in Nigeria. It identified types of investigative journalism practices like covert and overt, data-based and scientific strategies of exposing corruption, injustice and inequality around the world. It also identified how legislative encumbrances such as the Cyber Crime Act, 2015, as amended, stifle press freedom in Nigeria and recommends their abrogation. The paper also recommends a huge protection and insurance package for investigative journalists following the murder of several of them.

Keywords: Investigative Journalism, Media Laws

Introduction

By Section 22 of the 1999 Nigerian Constitution (as amended), the media is the watchdog of modern Nigeria. Coming after the legislature, executive and the judiciary, it is the fourth estate of the realm which reports, criticises and analyses government policies, programmes and those of individuals and corporate organisations whose actions can have a negative or positive impact on the lives and development of the public. Puhlinger et al (2008) stated that the mass media are expected to provide relevant, diverse, pluralistic and carefully investigated information to the public.

The said Section 22 of the Constitution mentioned earlier stated that: "The press, radio, television and ... the mass media shall at all times be free to uphold the ... accountability of the government to the people." Similarly, Section 15 (5) of the same Constitution states that one of the responsibilities of government is to "abolish corrupt practices and abuse of power." When combined with Chapter 2 of the Constitution, which identifies the welfare and security of the people as the essence of government, it becomes very clear that the media has a constitutional obligation to constructively criticise and hold government accountable, respecting how effectively it is discharging its duties, managing resources and meeting the needs of the people. Therefore, the media, through news reporting, analysis and investigative journalism, plays a critical role in the pursuit of good governance, accountability and social justice. To achieve this, investigative journalism is sacrosanct as it goes beyond what the politician or industries want published to what they may want to conceal.

Seibert, Peterson and Schram (in Isola 2008) state that media serve as the voice of the voiceless, monitor governance, protect the interests and rights of the citizens and advocate for issues and causes that engender growth and development within the society where it operates. Thomas Jefferson (in Jega 2011) also stated that the media is the best instrument for the enlightenment of the mind on man, improving on his rational morals as a social being. The media sets the agenda and shapes public discourse, and in moulding public opinion.

Investigative journalism is one of the means through which these roles are performed. It is the media's scientific approach or research into illegal or untoward activities which are otherwise concealed from public glare by government, individuals or organisations. Unlike other media reports, the subject matter is an exclusive initiative and original to the investigative reporter, and it must be of great importance to the general public, and a subject other want to keep under wraps. Weinberg

(2010) defined investigative journalism as: “the reporting, through one’s own initiative and work product, of matters of importance to readers, reviewers or listeners. In many cases, the subject of the reporting, which comes under scrutiny, is such that organisations and individuals want to remain undisclosed.”

Sobowale (2012) posits that investigative journalism practices come from a hunch, a lead or a hypothesis which is further subjected to undercover enquiries to ascertain their veracity through participant or non-participant observation, sourcing and scrutinising of relevant documents or sometimes through clinical examination of materials like toxins or industrial pollutions.

At the international level, one of the most historical cases of investigative journalism in upholding the law and public morality in the United States of America was the exposé by the *Washington Post* of the political espionage called the Watergate Scandal of 1972-1974. In the report, two journalists of the *Washington Post*, Carl Bernstein and Bob Woodward, investigated how aides of the sitting Republican President, Richard Nixon. The expose culminated in the resignation of Nixon, stated Hurge (2015).

In 2015, New Africa reported that a Ghanaian journalist, Anas Aremayaw Anas, led a group of other journalists and published an earth-shaking expose on widespread high-level corruption in the Ghanaian judiciary. He secretly recorded unsuspecting high court judges, magistrates adjudicating on serious cases like murder, robbery and their accomplices, collecting bribes. The recording was produced into a film titled “Ghana in the Eyes of God” and was watched by a record-breaking crowd of 6,500 people at the Accra International Conference Centre on September 23, 2015. The report led to the suspension of 34 judges and magistrates, some of whom were even arraigned in courts - a case of judges in the dock.

Similarly, in 2017, the horrendous human rights abuse and genocide leading to the massacre of 10 Rohmerian Muslims in Nyammiar was investigated and reported by two correspondents of the British News agency, *Reuters*. The investigative report revealed that the Rohingya Muslims, men and boys in Rakhine State, were not only killed by seven soldiers, but over 100,000 relatives of the victims were forced to migrate to Bangladesh. However, the genocide attracted international condemnations culminating in the conviction and sentencing of the seven soldiers in the law court.

Schiffin (2014) stated that a prominent investigative reporter with *The News & Observer* in Raleigh, North Carolina, in the United States, Pat Stith, carried out over 300 investigative reports between 1966 and 2008. Of these, 149 triggered substantive changes, 110 generated deliberations and further investigations, and 49 had special impacts such as sack or resignation. His reports were said to have engendered 31 new laws in North Carolina.

To effectively perform these duties, it has been argued that press freedom is sacrosanct. Described as a component of the Libertarian Social Responsibility Philosophy, which traces its history to England, Press freedom moves to is predicated on the premise that for the press to be able to assert its watchdog duties, it must be free from be completely free to perform its duties without molestation and government interference. But in Nigeria, several laws mitigate against the discharge of these duties as scores of journalists have been arrested and charged to court in recent times under such laws as the Cyber Crime Act 2015 as amended in 2024, Official Secret Act of 1962, Law Against Sedition and Public Officers (Protection against False Accusation) Decree 4, of 1984. While the media serves as the fourth estate of the realm has the responsibility to inform, educate, entertain and perform surveillance duties, its activities have been encumbered by draconian legislations. Quite often, many investigative

journalists have been arrested in the course of their duties, and some have been shot dead. In the process, their media houses have been proscribed by the government in a bid to silence them.

This paper, therefore, investigated these various legislations, directives and other activities which hinder investigative journalism practices and, in the process, stifle press freedom and hinder good governance. It determines the influence of existing laws on investigative journalism practices in Nigeria. The paper identifies types of investigative journalism practices in Nigeria, ascertains the number of draconian laws inhibiting media practice in Nigeria, *and determines* the level of impact of draconian laws on investigative journalism practices in Nigeria. This work is anchored on Agenda-setting theory propounded by Maxwell McCombs and Donald L Shaw and the Spiral of Silence Theory propounded by Elisabeth Noelle-Neumann.

Investigative journalism is viewed as “watchdog reporting” or “accountability reporting, muckraking journalism, advocacy journalism, public service journalism, expose journalism or journalism of outrage.” But it has also been posited that an acceptable definition of investigative journalism should include such key elements as “sustained news coverage of moral and legal transgressions of persons in positions of power, and that requires more time and resources than regular news reporting.” The subject matter can better be understood by isolating such key words as “sustained, systematic, and often long-term nature of investigative work,” which describes investigative journalism. It has also been opined by scholars that investigative journalism delves into moral and legal transgressions or wrongdoings made by persons in positions of power - political and or economic spheres of society- but insisting that such probe must be carried out by a trained individual or set of individual professionals trained in the art of media reporting that adhered to professional ethical standards.

According to Berger (2017), investigative journalism goes beyond routine reporting of daily occurrences; rather, it tries to uncover the most painful, sometimes bleeding sores, glaring contradictions that have high societal value. This genre of journalism represents attempts to probe the truth of any matter that is otherwise hidden because its non-disclosure serves the interest of some individuals or groups. For that reason, the manner of reporting is dispassionate and confidential. Investigative journalism uncovers abuse, infringement on laws, establishments, norms of morality, to give publicity to concealed or unlawful activities either in connection with businesses, organised crime, governance, political or financial activities, but must be reported in the public interest. Another purpose is to bring such failures to the fore, with the intention to galvanise lawyers, policemen and the government to take proper action. Such reports are also beneficial because they perform integrative and cognitive functions, serve psychological relaxation and hygiene, as well as serve the purpose of orientation and ideological connection.

Hence, the investigative journalist, after getting his lead from, maybe a source or whistleblower, forms a conjecture which is further operationalised as he applies probing or even scientific information gathering strategies. The various forms of investigative journalism practices include:

Covert or Undercover Journalism

Undercover journalism or dangerous liaison involves a situation where an investigative reporter enters an investigation area with deception, enmeshes themselves in the setting, sometimes in the form of incognito, to obtain first-hand information that can buttress or refute the allegations under investigation. Adopting participant observation methods, this investigative journalism practice is geared towards planning and conducting an investigative process with people whose lives and meaningful actions are under study, after which the

investigative journalist will step back with an understanding of the subject from familiar interaction and do their reports. He records his experiences sometimes with the aid of covert electronic gadgets like a wristwatch, pen, or camera carried on themselves, and the information so gathered becomes evidence to support an irrefutable report.

Non-Participant Observation

This investigative procedure refers to a practice where the journalist probes into an incident from the sidelines, without participating in or being involved in the process and yet chronicles his observations for publication. It is a form of surveillance which includes carefully carried out interviews of the people involved, listening to the participants who may include medical doctors, patients, victims and others with the sole objective to obtain vital information for publication.

Laboratory or clinical report-based journalism

Laboratory or clinical investigative reporting practice is a science-based practice where the investigative reporter relies on medical reports and laboratory tests to validate their reports. Sometimes, he obtains samples for laboratory analysis even as he peruses medical reports, breakthroughs. It is also known as clinical journalism. Health information data from the hospitals and even the National Centre for Disease Control (NCDC), mortuaries, the Ministry of Health in the various states of Nigeria, and the World Health Organisation are very vital in this instance. In the wake of the outbreak of COVID-19, the global data community made their websites available to investigative journalists to enable them to access and publish global developments in cases, spread, fatalities, and preventive and containment measures of the pandemic.

Data-Based Investigative Journalism

Data-driven reporting is another type of investigative journalism practice considered to be journalism's response to the 'datafication' of

society today. So widespread is data-driven reporting that it is viewed as an ongoing revolution in many parts of the world. It is a process where the investigative reporter obtains, sometimes purchases, vital documents and data for publication. Such data often come from whistleblowers or other insiders are verifiable data and documents which are analysed by the journalist for publication.

Media laws and investigative journalism

Backstone, cited in NOUN, describes laws as a set of rules which govern human activities and relations, a rule of actions prescribed by a superior authority which are bound to be obeyed, and are applied indiscriminately to all kinds of actions, rational or irrational. Laws are vital for regulation and control, and their absence can create chaos and anarchy.

The idea of press freedom or liberty of the press stems from evolved in 1668 revolution in England; however, Sweden is reputed to be the first country in the world to insert the concept in their constitution. Fatoba (2001). Described as a component of the Libertarian Social Responsibility Philosophy, which traces its history to England, Press freedom is predicated on the premise that for the press to be able to assert its watchdog duties, it must be completely free to perform its duties without molestation and government interference.

In the United States and some other developed countries, the media enjoys press freedom as enshrined in the Second Amendment of the US Constitution in 1791, it was expressly stated that “the Congress shall make no law to abridge the freedom of the press” Similarly, Karikari (in Olukotun, (2018) stated that Chapter 12, Article 162 to 173 of the Ghanaian Constitution, which guarantees Freedom of the Press, stipulates the rights of the media to function without state or external interference, with the provision that no media professional shall “be penalised or harassed for their editorial opinions and views or the

content of their publications.” Since 2001, no journalist has been arrested arbitrarily, or any newspapers or Ghanaian 90 radio stations been closed down

In Nigeria, however, despite the role media plays in development, and whereas Article 19 of the Universal Declaration of Human Rights guarantees freedom to hold and publish opinion without interference; despite the provision of Sections 22 and 39 of the Nigerian constitution investigative journalists tread on murky waters, politicians’ limitations by technology, and repressive laws militating against media practice. Despite the return to civil rule in May 1999 in Nigeria, the statute books are still replete with laws which inhibit media practice and, by doing so, investigative journalism. Top among these antiquated laws in Nigeria are:

Cyber Crime Act 2015 as amended in 2024

First enacted in 2015, the Act provides an “effective, unified and comprehensive legal, regulatory and institutional framework for the prohibition, prevention, detection, prosecution and punishment of cybercrimes in Nigeria.” Amended in 2024, it was designed to ensure the protection of critical national information infrastructure, and promotes cybersecurity and the protection of computer systems and networks, electronic communications, data and computer programs, intellectual property and privacy rights. Such crimes as cyberstalking, cyber bullying Section 3 makes it an offense to access someone’s phone or computer which attracts five years imprisonment; Section 4 prohibits modifying, deleting and obstructing someone’s data and attracts five years imprisonment; Sections 5 and 6 outlaw possessing of and communicating “critical information” to someone not authorised and each offence attracts 15 years imprisonment. By the Act, it is an offence to record private conversations, publish misleading information and outlaw disclosing to anyone when one receives a summons or police call outs, for Cyber Crimes.

Official Secrets Act of 1962. This law ensures that all government information is classified as “top secret”, which is often indicated on their files, thereby making it officially almost impossible for journalists to access them. A product of colonial rule, Elias (1969), Osinbajo and Fogam (1991), Okoro and Okolie (2004) have described this law as anachronistic.

Law Against Sedition. As contained in Section 50 (1) of the Criminal Code which applies to southern states, a seditious publication is a publication having a seditious intention, and Section 50 (2) defines seditious intention as an intention to “bring in hatred or contempt or to excite disaffection against the person of the Head of the Federal Government, the Governor of a State, or the Government or Constitution of Nigeria or a State as by law established or against the administration of justice in Nigeria or, (b) To excite Nigerians to attempt to power the alteration, after wise than by lawful means, or any other matter in Nigeria as by law established, or (c) To raise discontentment or disaffection among the inhabitants of Nigeria, or (d) To promote feelings of ill-will and hostility between different classes of the population of Nigeria. It is also of key interest that some components of the law include seditious conspiracy, seditious libel and seditious speech. It also stipulates who may be convicted of sedition.

Public Officers (Protection against False Accusation) Decree 4 of 1984. This decree, promulgated by General Muhammadu Buhari, was designed to curtail the activities of journalists to inform the public. Under the decree, two journalists, Nduka Irabor and Tunde Thompson of *The Guardian* Newspaper, were sent to jail under the then military ruler, Ibrahim Babangida. The decree outlawed and indeed identified as criminal any report that ridicules any officer of the military government.

The Offensive Publications (Proscription) Decree 35, 1993, based on which the military government closed down six media houses. This was

followed by the closure in 1993 of 17 newspapers, a magazine and one radio station in July 1993.

Treasonable and Treasonable Felony Offences Decree 29, of 1953. This draconian decree provides a death sentence on anyone who utters or displays, or publishes any work that can break up Nigeria

Newspaper Registration Decree 43 of 1993

The decree makes provision for the establishment of the Newspapers Registration Board with the Ministry of Information. This is a big threat to press freedom and a negation of the provisions of Section 39 of the 1999 Constitution.

Nigerian Press Council Decree 85 of 1992

The law is currently being amended to impose fines on any newspaper which violates the Press Code, or has its license revoked; whereas anyone whose newspaper is not documented with the Press Council shall be liable upon conviction to three years imprisonment or N5million fine. The amendment was suspended recently.

Newswatch Prohibition and Proscription from Circulation Decree 96 of 1987

Olukotun (2016) observed that despite the passage of the Freedom of Information Act in 2011, extra-legal actions by the police and the military include arbitrary arrest of journalists, the invasion by the military of media houses over publication of its planned attack on Boko Haram in the North-East was one. Idowu (2018) stated that in 2017, the Publisher of the *Premium Times*, Dapo Olorunyomi and other journalists were arrested and his office was raided allegedly on the orders of the then Chief of Army Staff, Lt. General Tukur Buratai, over the medium's failure to retract a story written on the Army chief. Earlier in 2003, three journalists of the Insider Weekly Magazine, Osa Director, Chucks Owundinjo and Janet Mba Afolabi were arrested, while in

2006, Mike Aruleba of the *AIT* and Rotimi Durojaye of the *Daily Independent* were arrested by security agencies for querying the age of one of the presidential jets. Also, some editorial staff of *The Nation* Newspaper, Yusuff Ali, Yomi Odunuga, Lawal Ogienagbon and Dapo Onifade were detained in 2011 over the newspaper's front-page report on "Obasanjo's Secret Letter to Jonathan Stirs Anger: Ex-President Seeks Sack of PTDF Chiefs, Four others."

Since investigative journalism exposes corruption, oppression, exploitation, criminal justice outrages, healthcare fraud, pay off and waste of government funds, how sustainable is investigative journalism against the background that media oligarchs, most policymakers, many of whom are beneficiaries of the corrupt system?

In the area of registration, private and public media houses obtain their operating license from the Nigerian Media Council (NMC) for print, while the electronic media secure theirs from the National Broadcasting Commission (NBC). This gives the government the power to control the organisation as they can withdraw their licenses after any publication, they deem offensive or injurious. By the NBC Act, 1992, as amended, political parties are precluded from establishing broadcast media, just as foreign ownership is restricted. By 1996, NBC had granted 114 operation licences, while by 2017, the figure leapt to 402 licences. However, by March of the same year, NBC reported revoked licenses of 54 broadcast stations.

Though private media houses tend to be very assertive and independent, they often come heavily under the government's hammer. A case in point was during the second term of the Olusegun Obasanjo government, when he ensured that DAAR Communication, owners of AIT and Raypower, was closed down for airing an air crash in Ogun State in which some top government officials, local and foreign, lost their lives. Also, Channels Television was shut down in 2008 for

broadcasting a report considered to be offensive regarding the health status of then-President Umaru Yar'Adua, then on his deathbed. In 2009, NBC shut down Adaba 88.9FM in Akure, and on April 17, 2015, during the same period, AIT was barred from coverage of activities of the then president-elect, Mr. Muhammadu Buhari, over "security issues", just like *Punch* Correspondent, Olalekan Adetayo, was expelled from the Presidential Villa, Abuja in 2017. The then Chief Security Officer of President Buhari hinged his action on a report titled "Fresh anxiety in Aso Rock over Buhari's poor health and 'Seat of power's event centres going into extinction" written by Adetayo.

More recently, DAAR Communication suffered a repeated fate on June 9, 2019, when NBC suspended its license over another report considered to have violated provisions of the National Broadcasting Code. National Broadcasting Commission (NBC) Director-General hinged the suspension on the outfit's failure to follow a two-year warning over the content of its programme, Political Platform and *Kakaaki*. The NBC accused the radio and television stations of "embarking on use of inflammatory, divisive, inciting broadcasts, and media propaganda against the government and the NBC for performing its statutory functions of regulating the broadcast industry in Nigeria."

Since then, the NBC Code was unilaterally reviewed by the Ministry of Information and Culture, which, in the process, drew the anger of the owners of radio and television. While the dust was yet to settle, in August 2020, NBC imposed a N5million fine on Nigeria Info 90.3FM for the interview it granted a former Deputy Director of the Central Bank of Nigeria, (CBN), Dr. Obadiah Milafia Obadia's comments on the "Southern Kaduna Crisis", over his claim that a governor was a Boko Haram sponsor. NBC said that the claims were unverified, inciting and could encourage or incite to crime and lead to public disorder. The Commission reiterated that broadcasters hold licenses in trust for the people, and therefore, no broadcast station should be used

to promote personal or sectional interests at the expense of the people.

The Commission stated that Nigeria Info 99.3FM, violated of the following sections of the Nigeria Broadcasting Code: No broadcast shall encourage or incite to crime, lead to public disorder or hate, be repugnant to public feelings or contain offensive reference to any person or organization, alive or dead or generally be disrespectful to human dignity; Broadcasting shall promote human dignity, therefore, hate speech is prohibited.

Akin to this is the operation of the secret service agents in the form of the DSS or police in Nigeria, or what has been referred to in Russia as “KGB-isation,” used against the press until the commencement of “de-KGB-isation. In Europe, the European Journal of Communication reported that some countries want to ensure the media is silenced. The Independent Journalists Association has compiled 39 cases of direct pressure and verbal attacks. In the United States, President Donald Trump in 2017 described the media as “the enemy of the people and purveyor of fake news.”

In November 2018, President Trump exhibited displeasure with the Cable Network News (CNN) by barring its Correspondent, Jim Acosta, from reporting at the White House, describing the medium as fake news. The action was reversed by a US court, but Trump repeated the same action in February 2019, barring four US journalists from covering his dinner with North Korean leader, Kim Jong-un, in Hanoi, Vietnam. In Nigeria, Femi Adeshina, the Special Adviser to President Buhari on Media and Publicity in 2019, “unleashed torrents of abuse and threats” on Punch’s State Correspondent, John Ameh over the reportage of President Buhari’s action after the Presidential Election Appeal Panel upheld his election, titled “Tribunal: Buhari retracts, confesses he was under pressure” asking “What was that rubbish you people wrote on Saturday?” It is on record that about 109 journalists

were attacked between 2010 and 2015, even as others, like bloggers, radio and TV stations and activists have been targeted since 2015 worldwide. At least 36 attacks on journalists were recorded between January and July 2019 alone, 30 of the attacks happening during the 2019 general elections in Nigeria. These attacks and harassment include arbitrary arrests and detention, physical attacks and even deaths. In 2018, at least 45 radio and TV stations were sanctioned by the authorities on unfounded allegations of breaching some codes of conduct.

A Ghanaian Communication researcher, for instance, asserted that Article 16 of the Constitution of Ghana makes an unambiguous provision against press censorship, government interference, control and harassment of journalists. Article 162 (2) stipulates that “there shall be no (media) censorship in Ghana,” even as Section 4, of Article 162 stipulates that: “editors of newspapers and other institutions of the mass media shall not be subject to control or interference by government not shall be penalised or harassed for their editorial opinions and views or the content of their publication.”

Researchers have argued that the effective mass media, devoid of legal restrictions and ethical and economic constraints, are vital sustainable democracy in Nigeria and indeed the entire world. This is anchored on the fact that it provides a good atmosphere for growth and development since it provides crucial information and educational material along with its watchdog duties, which promote good governance and eliminate ignorance, which precipitates conflicts. They asserted that the media, like Caesar’s wife, should be above board by avoiding unethical practices which might compromise their objectivity, but ensure commitment to investigative journalism as a vehicle for “Checking abuses of power, revealing corporate misdeeds and exposing government and individual faulty action” thereby promoting national and global development. To them, every fund invested in investigative

journalism is worth millions as it engenders development and good governance.

Similarly, one of the members of the Ghanaian investigative journalism team, who investigated match fixing fraud, Ahmed Husein was shot dead on January 17, 2019. Of similar interest was the murder on July 13, 2019, in the Somali city of Kismayo of journalist Hodan Nelaye, by al-Shabad terrorist group. Besides Dele Giwa of Nigeria, several investigative journalists have been arrested, detained or killed, allegedly by successive governments. Notable among these were the correspondent of *The News* in Kaduna, Mr. Bagauda Kalto was bombed in the Hamdala Hotel in 1996. Also, Mr. Bayo Ohu, the news editor of *The Guardian* was killed and his laptop destroyed in his house at Iyana Ipaja in Lagos, according to his wife, Dupe, while investigating a scandal involving a former Comptroller-General of Customs, who was later arrested with 16 exotic vehicles.

Also, on October 2, 2018, a Saudi journalist and popular critic of the Saudi government, Jamal Khashoggi, was reportedly killed, his body dismembered at the Saudi Consulate in Turkey, on the orders of the Saudi Crown Prince, who recently took responsibility for the crime, raising global condemnations. However, this has not successfully led to the dearth of investigative journalism or snuffed out the flame of investigative journalism. So prevalent is the passion for investigative journalism that its practitioners have formed various associations worldwide. They include African Network for Investigative Reporting (ANGR), African Investigative Publishing Collective (Ghana and Netherlands), 100 Reporters (USA) and many more. Global Investigative Journalism Network (GIJN). They organise periodic workshops in all parts of the world to enable journalists to sharpen their skills in the trade and teach them how to avoid inherent dangers. Similarly, lots of foundations offer scholarships to promote investigative journalism. For instance, GIJN provides awards, data,

emergency aid, fundraising, investigative journalism guides and legal defence to journalists around the world. They also provide fellowships like the Nieman Fellowship for investigative journalists with at least five years' experience to study at Harvard University for at least 12 weeks with grants totalling \$65,000. Also available is the John S. K. Knight Journalism Fellowship at Stanford University, where candidates will have access to \$85,000 stipend to cover books, tuition, and housing for a one-year course.

Conclusion and Recommendations

From the foregoing, it is evident that investigative journalism, though practised in Nigeria, is encumbered by various laws and government policies, which stifle open debate. Actions of government agencies and officials averse to investigative journalism negatively affect media practice in general, leading to arrest, detention and sometimes extra-judicial killing of Nigerian journalists. It is therefore imperative that Nigerian media laws should be reformed, and obnoxious ones abrogated to enable the media to perform their duties effectively. The National Assembly and the Nigerian Guild of Editors should revisit these laws to pattern them after what obtains in countries like Ghana and the US. That way, press freedom will be promoted for a better democratic society committed to open debate, accountability and access to information.

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