

**DIRECTIONS AND OUTCOMES OF THE HONOURABLE ATTORNEY
GENERAL OF THE FEDERATION PRINCE LATEEF O FAGBEMI
SAN ON THE REPORT OF THE 3-MAN COMMITTEE SET UP TO
LOOK INTO CAUSES OF THE PRESENT CONFLICTS WITHIN THE
NIGERIAN BAR ASSOCIATION (NBA), PARTICULARLY ON THE
WAY FORWARD IN MATTERS RELATING TO THE UPCOMING
2026 ELECTIONS OF NATIONAL OFFICERS OF THE NIGERIAN
BAR ASSOCIATION.**

INTRODUCTION

1. On the 11th of June 2026, I, the **Honourable Attorney-General of the Federation and Minister of Justice (HAGF), Prince Lateef O. Fagbemi, SAN**, invited the past **Presidents of the Nigerian Bar Association (NBA)** to a meeting scheduled for the same date. I took into cognizance the fact that two separate suits had been filed by some parties against the **NBA** and other stakeholders at the High Court of Oyo State, Ibadan Judicial Division, in respect of issues relating to the **NBA** general elections fixed for the end of **July 2026**.

2. I was made to understand, inter alia, that Ex parte orders of injunction had been made by the trial court while appeals against the said orders were pending before the Court of Appeal. The lower courts are on record as having stayed their proceedings pending the determination of the appeals against the ex parte orders. Furthermore, at the Court of Appeal on **1st June, 2026**, I instructed learned counsel representing the office of the **HAGF** to seek from their lordships to seek a short adjournment to enable me in my capacity as the Chief Law Officer of the Federation and the Official Leader of the Nigerian Bar, broker an amicable settlement among the parties, whereupon the Court of Appeal adjourned the matter to **15th June, 2026**.

3. At the meeting aforescribed, which was held on **11th June, 2026**, at the **Conference Room of the Honourable Attorney-General of the Federation and Minister of Justice** and which I presided over, all past **Presidents** of the **NBA** from **1998** to date, with the exception of **Chief T. J. O. Okpoko, OON, SAN**, were in attendance. Those in attendance include **O.C.J. Okocha, OFR, SAN; Chief Wole Olanipekun, CFR, OFR, SAN, LL. D, D.Litt., FCI Arb., FNIALS; Chief Bayo Ojo, CON, SAN** (participated online); **Prince Lanke Odogiyon; Dr Olisa Agbakoba, OON, SAN; Joseph Bodunrin Daudu, SAN, FCI Arb. Okechukwu Wali, OON, SAN** (who also participated online); **Augustine Alegeh, SAN; Abubakar Balarabe Mahmoud, OON, SAN; Paul Usoro, SAN, FCI Arb. Mr Yakubu C. Maikyau, SAN**, the current **NBA President**, and **Mazi Afam Osigwe, SAN**.
4. I received representation from the following stakeholders; Counsel representing the parties at both the High Court and the Court of Appeal, **Chief J. S. Okutepa, SAN** and **Mrs. Toyin Basorun, SAN**, respectively for the two sets of claimants in the cases; and Counsel to the **Incorporated Trustees of Egbe Amofin**; and **Babatunde Ogala, SAN; Abdul Mohammed Rafindadi, SAN; Lanre Akinsola, SAN; and Anthony Malik, SAN**; respectively for the **Incorporated Trustees of the NBA, the NBA President**, and the **Chairman/Members of the Electoral Committee of the Nigerian Bar Association (ECNBA)**.
5. All the Past Presidents of the Nigerian Bar Association in attendance also gave their perspectives on how to solve the crises now plaguing the Bar.
6. To pave the way for a proper resolution of this matter, it was unanimously agreed by all present that an adjournment hearing of the pending case in

the court of appeal be sought. In total, three (3) adjournments were sought and granted, viz.: the first of June (the earliest), and the other two (2) were on the fifteenth of June 2026 and the 3rd of July 2026.

7. After listening to the participants, I, again, in my capacity as the **HAGF**, summarised the issues in contention and invited suggestions on the way forward to resolve the conflicts highlighted by the various parties. **Babatunde Ogala, SAN**, counsel to the **Incorporated Trustees of the NBA**, proposed the establishment of a **committee** to be headed by **Chief Wole Olanipekun, CFR, SAN**, with the mandate to call all the parties involved with a view to reconciling them. The issue of a Peace Committee having been accepted, the composition thereof **was made up of Chief Wole Olanipekun, CFR, SAN, Prince Lanke Odogiyon and Paul Usoro, SAN, FCI Arb**, and their mandate, inter alia was to *examine the cause or causes of the present conflicts within the NBA leading to the institution of the referenced cases, and to make appropriate recommendations on the way forward to the Honourable Attorney-General of the Federation and Minister of justice* and to commence its assignment forthwith and submit its Report as soon as practicable, time being of the essence, particularly in view of the fact that the **NBA General Election** is scheduled for the end of **July 2026**.

THE REPORT OF THE OLANIPEKUN COMMITTEE

8. I am pleased to say that I have received the report of the Olanipekun Committee. There appear to be two reports. The majority report, signed by its Chairman and Past President, Prince Lanke Odogiyon, on the one hand, and a minority report submitted by Past President Paul Usoro, SAN. I have painstakingly considered both documents. It will not be necessary to set

out the modalities and the evidence received and acted upon by the Committee, except were absolutely important. I propose identifying the Committee's key issues and recommendations before outlining what I consider the appropriate measures to resolve the current impasse.

9. I note that the **Committee** held its inaugural meeting via Zoom on **Monday, 15th June, 2026**, where it set out the **modus operandi** that would guide its proceedings and adopted a structured methodology comprising:

- i. Call for memoranda from parties, particularly the three **Presidential Candidates – Aare Muyiwa Akinboro, SAN; Lateef Omoyemi Akangbe, SAN; and Mrs Oyinkansola Badejo-Okusanya, SAN; Egbe Amofin; Mid-West Bar Forum; President NBA; and Chairman ECNBA.**
- ii. The **Committee**, from its report, received memoranda from the following:
 - (a) **Aare Muyiwa Akinboro, SAN,**
 - (b) **Egbe Amofin O'odua,**
 - (c) **Chief J. S. Okutepa, SAN,**
 - (d) **Lateef Omoyemi Akangbe, SAN,**
 - (e) **Addendum by Egbe Amofin**
 - (f) **Chairman of the ECNBA, Aham Ejelam, SAN.**(Their memoranda were annexed to the Olanipekun Report as Appendixes and accordingly numbered)

10. The Committee also took evidence from stakeholders but was unable to interface with the President of the Nigerian Bar Association, Mazi Afam

Osigwe, SAN, and one of the Presidential Candidates, Mrs Oyinkansola Badejo-Okusanya, SAN. The modus operandi of the Committee and the evidence it considered are annexed to its report, which I have faithfully and dispassionately considered.

11. In view of the fact that I have annexed both the majority and minority reports to my findings, it is unnecessary to set out their contents. However, to have a clear understanding of the prevailing issues, it is necessary to set out, unedited, the complaints of the various stakeholders who submitted themselves to the jurisdiction of the Committee set up by the HAGF, along with the various responses thereto, especially from the Chairman of the NBA Electoral Committee.

12. **Aare Olumuyiwa Akinboro, SAN**, stated his complaints in his memoranda as follows:

- i. **Unconstitutional appointment of the members of the ECNBA by the president instead of the National Executive Council (NBA-NEC).**
- ii. **Electoral manipulation and loss of confidence in electronic voting,**
- iii. **Failure to implement agreed electoral safeguards.**
- iv. **Serious reservations about the appointments of election service providers.**

- v. **Concerns about external influence and manipulation of the electoral process.**
- vi. **Partisanship of the NBA President.**

Under this head of complaints, Aare Akinboro, SAN, posited that:

- a. **Campaign materials were allegedly distributed during the Health Walk organised as part of the 2025 NBA Annual General Conference held in Enugu.**
- b. **The candidate allegedly enjoyed preferential visibility at NBA conferences and programmes, particularly at the “UNBARred Party” held during the 2025 NBA Annual General Conference, where her images were prominently displayed on large billboards, without similar visibility being accorded to other candidates.**
- c. **The President allegedly stated publicly during the NEC meeting held on 5th February, 2026, that he could not be *neutral* in the forthcoming NBA election, as he also had a democratic right to vote.**
- d. ***At the NBA-SPIDEL event, the President allegedly encouraged lawyers to “trust a woman with the leadership of the NBA”, a statement which the Memorandum characterises as indirect campaigning.***

- c. The **President** allegedly used various **NBA** platforms, *including* the Women's Forum, the Young Lawyers Forum, and the **NBA Committees**, to promote his preferred candidate by encouraging, pressuring, or persuading members to support that candidate.

13. **EGBE AMOFIN O'ODUA** memo raised such issues as:

- i. Its decision as far back as 2019/2020 to follow the **Constitution** of the **NBA**, particularly **paragraph 4, Part III, (2nd Schedule) NBA Constitution, 2015 (as amended in 2025)** which provides thus: **"Where a position is zoned to any particular geographical zone, the position shall be rotated and held in turn by the different groups and/or sections in the geographical zone."**
- ii. It's choice of a consensus candidate after filtering, interfacing and interviewing four candidates who showed interest from within the Egbe.
- iii. Attempts to frustrate the zoning and consensus arrangement.
- iv. Partisanship of the **NBA President**. In this regard, similar reasons advanced by **Aare Akinboro, SAN**, have been restated.
- v. Protest against the **ECNBA Constitution**.
- vi. Constitutional vacuum and electoral impasse.
- vii. Disregard of court orders.
- viii. Concerns regarding the appointment of **Mikrodigital Connect**.

- ix. Broader governance and institutional concerns.
- x. That all letters and memoranda sent/forwarded to the various organs of the leadership of the NBA, as well as the Body of Benchers and the Board of Trustees, were neither acknowledged nor responded to, leaving the Egbe and its members with no other choice than to approach the court to ventilate their grievances.

14. **LATEEF OMOYEMI AKANGBE, SAN:** put the core of his complaints thus:

- i. The Constitutional infirmity of the ECNBA's appointment.
- ii. The procurement and defence of service providers without demonstrable fitness
- iii. The abandonment of the agreed authentication safeguards.
- iv. An apparent tendency to work backwards from a predetermined answer to a convenient question.
- v. The partisan conduct of the appointing authority: because of the seriousness the Committee attached to this head of complaint by **Akangbe, SAN**, particularly during his interaction with the **Committee on 23rd June, 2026**, they reproduced the grounds on which he based his complaints:

- (a) At the 2025 **NBA** Annual General Conference Health Walk, campaign materials of a particular candidate, including branded face caps and stickers, were distributed to attendees. No other candidate was afforded the same opportunity.
- (b) At the "**UNBARred Party**" organised as part of the same conference, the same candidate's images were prominently displayed on large billboards. No similar visibility was extended to any other candidate.
- (c) At the **NEC** meeting held in Maiduguri, Borno State, on **5th February 2026**, the **NBA President** openly declared that he "cannot be neutral" in the forthcoming election, claiming a democratic right to vote.
- (d) At an **NBA-SPIDEL** event held on **13 April 2026**, the **NBA President** publicly urged lawyers to "trust a woman with the leadership of the **NBA**," a statement that can only be understood as an open campaign endorsement of the sole female presidential candidate.
- (e) There are consistent and credible reports that the **NBA President** has personally called members of the **Association**, including Senior Advocates of Nigeria, to solicit support for his preferred candidate.

15. **AHAM EJELAM, SAN (Chairman, ECNBA):** The **Olanipekun Committee** summarised his memorandum as follows: "The memorandum dated **24th June, 2026** was received at about 5:12 p.m. on

the same **24th June, 2026**, that is, over 24 hours after the respected Chairman's virtual interaction with the **Committee**. This notwithstanding, the **Committee** considered it in fair detail, noting the **ECNBA Chairman's position** on his integrity, which the **Committee** respects, as well as his defence of the **Committee** against any allegation of bias. In paragraph 2 of the memorandum, he stated that his **committee** followed due process in engaging the service providers. In paragraph 3, he gave reasons why the **Committee** had not adopted the proposal for the use of NIN and IP address. Regarding his appointment as a member of the **Body of Benchers**, he stated in paragraph 5, and the **Committee** agrees with him, that by virtue of his age and standing at the Bar, he was, and is, qualified for appointment to the **Body**.

16. The committee, in its elaborate report, considered all the Complaints and supporting evidence. The Office of the HAGF also further notes references made to relevant legislation, such as:
- (i) Sections 1, 10-(2) and (3) of Legal Practitioners Act,
 - (ii) Sections 16, 22, 27 and 30 of the **National Identification Management Commission Act, 2007**,
 - (iii) Article 15, 3rd Schedule to the **NBA Constitution, 2015 (as amended in 2025)** Paragraphs 4 - 7, Part III, (2nd Schedule) **NBA Constitution, 2015 (as amended in 2025)**

FINDINGS OF THE OLANIPEKUN COMMITTEE

17. The Committee, after reviewing and considering all the memoranda, documents, and *viva voce* presentations of the individuals with whom it interacted, notes that it arrived at the following findings, which are reproduced verbatim.

- i. That the idea of zoning the Presidency of the NBA in particular was first mooted in the year 2000 when two former Presidents of the Association (O. C. J. Okocha, SAN and Chief Wole Olanipekun, CFR, SAN) were then running and campaigning as candidates for the office of President of the Association, O. C. J. Okocha from the South-East and Chief Wole Olanipekun, SAN from the South-West.
- ii. Although the zoning formula/arrangement was not enshrined in the NBA Constitution until much later, it was implemented seamlessly between them and thereafter substantially.
- iii. In the South-West, the practice is for Egbe Amofin, which serves as the umbrella for all lawyers of the South-West extraction, to call for expression of interest among all the aspirants wanting to vie for positions at the national level, after which the Egbe would constitute a committee to interface with the interested candidates and, eventually, adopt one of them for the position.
- iv. Egbe Amofin, pursuant to the NBA Constitution, agreed on micro zoning within its different states, as borne out by Annexure B to its Addendum, an annexure which is attached to this Report as Annexure 12.
- v. For the 2026 Elections, Egbe Amofin micro-zoned the office of the President to Zone 2, which comprises Oyo and Osun States.

- vi. That Egbe Amofin set up a committee of 6 people, Oluwatoyin Bashorun, SAN, Kunle Adegoke, SAN, Seun Abimbola, SAN, Gbemiga Adaramola, Esq., Prof, Fassi Yusuff and Dr Banke Oloba Olateru, to interact with the four candidates from the South-West who showed interest in the NBA Presidency from within its fold. The four candidates are Aare Muyiwa Akinboro, SAN; Mr Lateef Omoyemi Akangbe, SAN; Prof. Foluke Dada-Lawanson; and Mrs Oyinkansola Badejo-Okusanya, SAN. The Report of the Committee, annexed to Egbe Amofin's memo as Annexure C, is attached to this Report as Annexure 13.

- vii. In Annexure 8, the four aspirants were evaluated in the following order:
 - a. Aare Muiyiwa Akinboro, SAN
 - b. Mr Lateef Omoyemi Akangbe, SAN
 - c. Prof Foluke Dada-Lawanson
 - d. Mrs. Oyinkansola Badejo-Okusanya

As at the time the Report was signed and submitted on 26th August, 2025, Mrs Oyinkansola Badejo-Okusanya was not yet a Senior Advocate of Nigeria; hence, she was not addressed as such.

- viii. With much respect to the President of the NBA, Mazi Afam Osigwe, SAN, the Committee is of the view, as well as the conclusion, that he should have managed or handled the situation leading to the accusation being levelled against him more discreetly. The perception that he is partisan, as well as the

accusation to that effect is/are not without substantial foundation. With further respect to Mr President, the Committee saw little justification for the comments he made in Annexure 11 (Annexure 10 attached to Aare Akinboro's memo). Furthermore, trying to impress upon his audience that Mrs Priscilla Kuye, a former female President of the NBA, was not an elected President but one who merely completed Sir's tenure. Clement Akpangbo, SAN, when Akpangbo was appointed as the Attorney-General of the Federation, was not necessary at all.

- ix. The Committee is not unaware that Mr President later stated that he would not vote at the election, apparently seeking to retract his earlier statement that he could not be neutral. The fact remains, however, that his earlier statement had not only gone viral but had also registered in the minds and psyche of several people. Furthermore, the rightly perceived campaigns in favour of a particular candidate could not, and can no longer, be withdrawn.
- x. The Committee is also of the view that Mr. President should not have come out openly to say that he was not going to be neutral in the election exercise; he should not have allowed the Roll up Banners or photographs of any candidate to be displayed at any of the NBA functions, particularly as far back as the NBA Annual AGC held in Enugu in August 2025; same observation goes for the branded bottled water of the same candidate served at the NBA organized dinner at the Maiduguri NEC meeting of 2026.

- xi. While commending Mr. Aham Ejelam, SAN for his forthrightness by stating that he was appointed a Bencher around the same time he was appointed the Chairman of ECNBA, the Committee notes with curiosity the contemporaneousness of that appointment and others (including that of the ECNBA Secretary, Prof. Foluke Dada-Lawanson and others) with timing and inauguration of the ECNBA, the ongoing campaigns for the office of the President of NBA – including the migration from one candidate to the other by some conspicuous *dramatis personae*.
- xii. In *Aondoka v. Obot* (2016) 6 NWLR (Pt. 1508) 280 at 322, it was held that the word ‘bias’, as defined in Black’s Law Dictionary, means “an inclination, bent, a preconceived opinion or predisposition to decide a cause or an issue in a certain way which does not leave the mind perfectly open to conviction.” In *Okeke v. Nwokoye* (1999) 13 NWLR (Pt. 635) 495 at 509, the Supreme Court described ‘bias’ as showing an act of partiality. In *Azuokwu v. Nwokama & Anor* (2005) LPELR-690(SC), “bias” was described as “an inclination or predisposition to decide a cause or matter in a certain pre-arranged way without regard to any law or rules; and likelihood of bias may be drawn or surmised from many factors such as corruption, partisanship, personal hostility, friendship, group membership or association, and so on, towards or involving a particular party in a case.”
- xiii. In the conduct of NBA elections, the Committee is of the opinion that there must be transparency from the get-go through to the end of the process; transparency in the way and manner the

parties are treated; transparency in the appointment and inauguration of members of the ECNBA; open-mindedness on the part of all parties involved and to all participating candidates. Messrs. Akinboro and Akangbe are of the strong view that the leadership of the NBA has demonstrated open bias and prejudice against them, while displaying open support for another candidate – Mrs Oyinkansola Badejo-Okusanya, SAN in terms of gesticulations, directives to lawyers, open speeches, peculiar indulgences, special privileges, preferential treatments, etc. The Committee finds merit in their complaints.

- xiv. While the Constitution of the NBA mandates that the NBA-NEC appoint the ECNBA members, using the word 'shall', the Committee has no evidence that the NEC made the appointment of the ECNBA members, whether the first 5 or the additional 2. What was/is presented before the Committee was that the President merely rolled out the names of the ECNBA members at the NEC meeting.
- xv. Appointment of service providers has been done without the involvement, participation and collaboration of the candidates. The Committee took note that the usual or expected procedure in appointing service providers is for the leadership of the NBA to call all candidates and solicit their opinions and contributions.
- xvi. The Committee is of the view that the reservations expressed by Messrs. Akinboro and Akangbe about the integrity, expertise, professionalism and capability of the service providers and technical personnel sourced and appointed by the ECNBA are

well founded. The Committee notes with concern the complaint by Mr Akangbe, SAN, and the support of Aare Akinboro, SAN, and Egbe Amofin, that the NBA is under the stranglehold of a cabal.

xvii. The Committee examined the provisions of the NBA Constitution relating to qualification to vote and be voted for at the Branch level, as well as eligibility to vote under the National Constitution, and further noted that the Branch Constitution is now incorporated in the National Constitution. To this end, the Committee is of the view, upon a combined reading of the two provisions, that voting at the national level of the NBA is not an all-comers' affair, as is sometimes presumed. It is the opinion of the Committee that only members who are qualified to vote at the Branch level can vote at the national level, irrespective of what is referred to in some quarters as universal suffrage. In this wise, it is the branches that will collate the names of their members who are qualified to vote and transmit them to the national level or headquarters. No voter in the NBA can or should be allowed to vote if he or she does not belong to a branch, and the national headquarters cannot certify a lawyer as a bona fide member of a branch. Only the Branch can so certify.

xviii. Having regard to the general complaints about the recent NBA election, and more particularly the 2026 General Elections, it is only reasonable that the relevant provisions of the National Identity Management Commission Act, 2007, should be strictly adhered to by the NBA in conducting its election. The argument that, in applying the provisions of the said Act in the conduct of

NBA elections, some lawyers would be disenfranchised is of no consequence, as lawyers are expected to have their NIN ordinarily, and non-compliance with the provisions of the Act is an offence punishable by imprisonment and fine.

- xix. The Committee was availed of a copy of a statement dated 10th June, 2026 titled “Constitution of Caretaker Committee for the NBA Abuja Branch (Unity Bar)” issued and signed by the NBA President, Mazi Afam Osigwe, SAN, on 10th June, 2026, whereby he constituted a Caretaker Committee comprising three people for the NBA Abuja Branch with immediate effect, with a mandate, amongst others, to serve for an initial period of three months or until a duly elected Executive Committee is elected. For ease of reference as well as emphasis, a copy of the said statement is attached to this Report as Annexure 14. By parity of reasoning, the Committee is of the view that, if for any reason the NBA General Election slated for July cannot be conducted as planned, whether at any time before the end of August 2026, when the tenure of the present National Executive Committee expires, a Caretaker Committee can be instituted and inaugurated for the NBA within the prevailing legal framework.
- xx. The motto of the NBA is "promoting the rule of law". One does not expect anything less, as the motto of the NBA, which is the largest professional Association in Africa. The NBA is expected to be the conscience of the nation and rightly serve as ombudsman. In this connection, it is expected of the NBA to always do constructive critiques of the actions and inactions of governments at various levels, and proffer solutions. In this

regard as well, the manner in which the NBA conducts its elections and affairs should serve as a litmus test for the government and as a threshold for all to follow. Thus, the Committee finds that it would be hypocritical of lawyers generally to mount criticisms of governments, at both the federal and state levels, when they cannot put their own house in order. In like manner, the NBA would have no reason to criticize any decision of our superior courts arising out of bias, prejudice or partisanship, if the NBA indulges in such sundry acts.

- xxi. As between the various zones within the NBA, the Committee is of the opinion that there must be an interplay of respect and reciprocity of courtesy among the zones, and that the decisions and resolutions of every zone should be respected by the others, except that such decisions and resolutions are illegal. In this connection, the Committee finds that other zones within the NBA should respect or give due consideration to the decision of Egbe Amofin in respect of its resolution in Annexure 15. In this connection, the Committee finds very apt the dictum of His Lordship, Kekere-Ekun, JSC (as he then was, now CJN) in *Gana v. SDP* (2019) 11 NWLR (Pt. 1684) 510 at 545, where His Lordship posited thus:

“It is curious that the appellant, knowing that the 5th respondent is from the Southern part of Nigeria, freely participated in the primary election conducted on 6/10/18 without any complaint or protest whatsoever, and only wrote his petition to the 1st respondent's appeal panel when he failed to clinch the ticket. It is also unfortunate that he failed to adhere to

the written undertaking, freely given under his own hand, to support whoever emerged victorious from the exercise.”

- xxii. So much expenditure, financial, human and material, is being deployed to campaigns for the NBA Presidency in particular. Borrowing the words of Aare Akinboro, SAN, a particular candidate who stepped down for him claimed that he should reimburse the humongous expenses already incurred. The Committee finds these expenses and the attendant adventures scandalous and capable of destroying the image of the Association if not quickly nipped in the bud. The Committee is also of the view that the NBA remains one of the very few professional associations in Nigeria, and one of the very few lawyers’ associations worldwide, where campaigns for the Presidency assume sundry negative dimensions and where no arrangements are made for hitch-free succession, as is done in the IBA or Commonwealth Lawyers Association. The Committee finds this situation very threatening and considers that it should not be allowed to linger further.

THE OLANIPEKUN COMMITTEE’S RECOMMENDATIONS

18. The HAGF notes the recommendations of the Olanipekun Committee, which are reproduced hereunder, and will add/include in each recommendation the Position/Outcome and Direction of the Hon. Attorney General of the Federation.
- i. **That all the cases pending in the various courts, both at the High Court and the Court of Appeal, be withdrawn. [HAGF accepts this recommendation and hereby directs all parties to forthwith sheath their swords and withdraw all actions identified above relating to the forthcoming NBA elections.]**

- ii. Having regard to the findings of the Committee to the effect that the sundry allegations against the Leadership of the NBA, in terms of bias, prejudice, partiality, and partisanship, are well-founded, coupled with other legal and allied reasons earlier identified, the ECNBA should be disbanded. While the Committee respects the integrity of the ECNBA Chairman, as well as his standing at the Bar, the Committee notes with some measure of concern that, though he and his members were appointed in November 2025, after his/their appointment, the appointor, Mr President, was involved in the partisanship and biased activities complained of by Messrs. Akangbe and Akinboro. Specifically, Annexure 11, which is the recorded video clip where the President openly advocated for the election of a female president, occurred on 13th April, 2026, while the Maiduguri NEC meeting took place on 5th February, 2026. As lawyers, we should be mindful of the impression on any rational person in these recurring circumstances. Meanwhile, as lawyers, it is necessary to imagine what the NBA's reaction would have been had all of these transpired within the country's macro-political space, between the Presidency and INEC. This is more so as the issue of non-compliance with the provision of the NBA Constitution regarding the said appointment of the ECNBA remains the big elephant in the room. [HAGF notes this recommendation and will urge that, in future, serving Presidents of the Nigerian Bar Association be circumspect when displaying their preferences for candidates vis-à-vis elective offices in the NBA during their tenure, as demonstrated in this instance.]
- iii. That the service providers already engaged by the ECNBA and/or the NBA, namely Mikrodigital Connect and Thane Linc Nigeria Limited, be disengaged forthwith. The Committee is under no illusion that both have not presented any track record, and have shown no demonstrable expertise, competence, proficiency, professionalism, commendation or experience to conduct an election of the magnitude being foisted on them by the Association. [Hon. AGF accepts these findings. [Hon AGF notes this recommendation and agrees with it. The provenance

of the service providers does not in any way inspire confidence. It is hereby directed that new NBA service providers, with a track record of performance in electronic or digital voting for large Organizations, be appointed to conduct the 2026 elections at any time before the 2026 annual conference. As things stand now, these Organizations, which are glorified one-man businesses (not being a registered limited liability company with requisite experience), should not conduct our NBA elections.]

- iv. For Mikrodigital Connect, we agree with the concerns expressed by Messrs. Akangbe and Akinboro, following their independent findings at the Corporate Affairs Commission that:
 - a. The entity is a mere business name registered with the Corporate Affairs Commission in 2019, with one Shamsuddeen Haruna as its sole proprietor.
 - b. The nature of business of the entity is simply described as Information Service Activities. It is therefore surprising that a firm whose nature of business is Information Service Activities was engaged to conduct an online election.
 - c. There is no information as to its experience, personnel, competencies, track record and jobs executed in the past. This raises serious questions about its capacity to host the online voting platform and to ensure its stability and security throughout the elections.
 - d. There is also the question of capacity, as a background check shows no evidence that the entity has previously handled a task similar to managing the NBA election. The scale and very important nature of the NBA election does not allow for learning on the job.
 - e. The entity, which ought to have commenced payment of its Annual Returns to the Corporate Affairs Commission

since 2020 in compliance with CAMA, failed to do so from its inception until after its appointment as a service provider in the forthcoming election. Due diligence revealed that it hurriedly paid the Annual Returns for 6 years (2020-2025) in arrears between 22:02 on 31st May, 2026 and 12:30 on 1st June 1, 2026. This raises the issue of corporate responsibility and discipline on the part of the entity, as well as whether the ECNBA conducted the requisite due diligence or chose to overlook it due to vested interests.

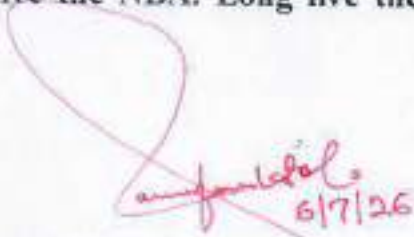
- f. Mr Shamsudeen Haruna, in the course of questioning by the consultant to Mr Yemi Akangbe, SAN, during the bid defence, confirmed having been part of the 2024 election of the NBA and in possession of the data of over 70,000 (Seventy Thousand) lawyers. When questioned further as to why he retains such data, he stated that he has not been disengaged. [HAGF notes this and adopts the recommendations and outcomes as set out in Paragraph 18-(iii) above.]
- v. The micro-zoning done by the Egbe-Amofin in line with the NBA Constitution should be allowed to stand. [HAGF notes this, and his of the fond view that a more solid arraignment will be required to implement same in this case, the arraignment cannot be implemented in this election as all contestants have gone too far in their campaigns to be called back. HAGF is therefore of the view that in future elections NBA zoning and micro-zoning arrangement, where in place, should be respected and implemented.]
- vi. The NBA General Election, slated for the end of July 2026, will be postponed, either to a feasible time in August 2026 or to any time soon thereafter. [HAGF, as shown above, accepts this recommendation.]

- vii. Whether the elections are held between now and the end of August 2026, or under a Caretaker Committee or any other institution under the leverage of the law, an Independent Electoral Oversight and Audit Committee should be constituted to conduct the 2026 elections of the NBA. This, in view of the Committee, will lend credibility to the entire process. [HAGF accepts this recommendation and directs the Bar to implement the same as swiftly as possible.]
- viii. Access Bank Plc, being the Bank to which practising fees of members of the Association are paid and which has details of all members who have paid their practising fees, should make available to the Independent Electoral Oversight and Audit Committee the list of members who have paid their practising fees.
- ix. A new register of members who are eligible to vote should be compiled, starting from the Branch level, from where the list of eligible voters shall be forwarded to the independent electoral commission.
- x. For the purpose of the election, the telephone numbers of members combined with the National Identity Number (NIN) be compulsorily used to clear eligible voters; bearing in mind the clear provisions of the law on the use of NIN, and the serial abuse of the Supreme Court Enrolment Number in the past, an Enrolment Number which cannot be classified as a security number.
- xi. Mobile phone SMS should be used to receive voter authentication instead of email, which has been proven susceptible to manipulation. [HAGF accepts the recommendations in para. 18-vii, viii, ix, x and xi (only to the extent that NIN be compulsorily used bearing in mind the NIN Act passed into law in 2026) and directs the NBA to swiftly implement same.]

- xii. In case we still have more than one candidate before the election, the candidates should all engage in the choice of the service providers.
- xiii. The NBA Constitution should be recalibrated, particularly in sections and areas relating to succession, so that, in line with succession procedures or practices in the IBA or the Commonwealth Lawyers Association, succession procedures in the NBA should be enshrined in the Constitution, and on no account should anyone who has not held any position with proven record of success or commendation at the Branch, Sectional or National level be allowed to contest for any National office, particularly the NBA Presidency. [HAGF accepts this recommendation and urges future leadership of the NBA to take steps to implement this or any other progressive leadership succession plan.]
- xiv. The Committee is of the view that the furore (sic) being generated over whether or not the NBA should 'zone' the presidential ticket to a woman this time around is unnecessary, bearing in mind that at no time in the past has the NBA prevented any lady lawyer from contesting an election to any office, particularly the presidency. It is the position of the Committee that what should be of prime importance to the NBA in electing anybody/lawyer to any office should be the primary criteria of competence, efficiency, ability, character, capability, track record of performance, experience, integrity, etc., and not any gender-based issue.' [HAGF is of the view that the issue of gender is not a relevant qualifying factor for leadership in the law profession, the Bar inclusive, having regard to the fact that both genders have occupied the highest positions/offices in the legal profession. This affirms the maxim "no women at the Bar"; everybody, regardless of gender, is qualified to contest for any position or office of the Nigerian Bar Association once the criteria set out are met.]

CONCLUSION

19. May I seize this opportunity to thank my Noble Lords (Justices) of the Court of Appeal, Ibadan Judicial Division, for affording me the rare privilege to intervene in this matter.
20. I also most sincerely thank all stakeholders, including but not limited to the President of the Nigerian Bar Association, past Presidents of the Association, Candidates for National offices of the NBA, the Chairman of the ECNBA, etc., for their quest to secure electoral peace for the Association. Long live the NBA. Long live the Federal Republic of Nigeria.


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