

Review of Nigeria's Supreme Court Judgment on Zamfara State APC Crises: Lessons for Nigerian Political Actors

Anas Sani Anka Ph.D

Lecturer,

Department of History & International Studies
Federal University Gusau

Abstract

This position paper examines the history of the political crises within Zamfara APC ahead of the 2019 general elections and how it influenced legal tussle from the lower to the Supreme Courts of Nigeria. It also makes a critical evaluation of the action and in-action of the former Governor Abdulazeez Yari Abubakar and how it was politically and legally contested for by Senator Kabiru Garba Marafa and few other political actors within the APC Zamfara State. It also conducted critical evaluation of the impacts of contradictory verdicts from courts of coordinate jurisdictions and how their logical conclusion of legal issues can be used as lessons for the Nigerian political actors. The paper adopted mixed methodology of literature review and filed interviews to ascertain the validity of facts for evaluation.

Keywords - Review, Judgment, Supreme Court, Lessons

Introduction

One of the lessons left behind by the aftermath of the 2019 general elections in Zamfara State is the unending battle of the mind and soul between the two major political camps in the opposition All Progressive Congress APC. The first was the political camp headed by the former Governor of the state Abdul'azeez Yari Abubakar and the other one led by the former Senator who represented Zamfara Central Kabiru Garba Marafa. The political rivalry between the two political actors within the opposition APC in Zamfara created a unique political scenario in the political history of Nigeria to an extent that, the two political camps within one political umbrella pursued their political crises up to the level of Supreme Court of Nigeria and finally get the victory of the party transferred to the opposition Peoples Democratic Party led by Bello Muhammad Matawalle.

The crises within the ruling APC in the state started when the former Governor Yari ahead of the conduct of the primary elections for the 2019 general elections emerged with the list of those to contest for all elective positions including a gubernatorial seat

for the APC and insisted that, all other aspirants within the party sealed out their political aspirations for it has been the usual tradition of the party in the state since 1999. This political decision by Yari did not go well with Senator Kabiru Marafa and his political camp who out rightly objected the political arrangement.

Senator Marafa alongside seven other gubernatorial aspirants namely, the then Deputy Governor Malama Ibrahim Wakkala, former Governor of the state Mahmuda Aliyu Shinkafi, former Minister for Defence Mansur Dan-Ali, retired Permanent Secretary Abu Magaji, retired Executive Director First Bank Nigeria Dauda Lawan Dare, former House of Representative member Aminu Sani Jaji and Sagir Hamida Gusau formed a political alliance tagged Group of eight (G8) to challenge the unilateral decision of Governor Yari for anointing candidates for the APC without allowing for the conduct of the party's primary elections.

APC National Headquarters after failed attempt to conduct a valid primary elections for the APC in Zamfara through two spread committees Chaired by Prof. Abubakar Fari and retired General Mustapha Gana, in one of the Interview said, "there was no primary election for the APC in Zamfara State and that the party may loss out to the participation in the 2019 general election in the state" (NAN 2018). But Yari insisted that, the Primaries was conducted by the state structure of the party under his watch in order "to meet the Independent National Electoral Commission's deadline and that results were collated from all the 147 wards of the 14 local government areas of the state and submitted to the party. He also said that this effort would ensure that APC in the state was not left out in the submission of its candidates for the general elections" (NAN 2019).

. Governor Yari through a court order also influenced INEC to accept the list of the candidates that emerged through his primaries and allow them participate in the election, the February and March 2019 general elections led to the emergence of the Yaris's APC candidates as victorious of the 2019 general elections and secure the release of their certificate of return from the INEC.

Earlier than the election time, the singlehanded action of Yari and his supporters influenced one of the gubernatorial aspirants in the APC Zamfara Senator Kabiru Garba Marafa to join Yari as the defendant in the suit filed by same Yari at the State High Court 111 seeking for an order validating the primary election he conducted and compelling INEC to accept the list of the successful candidates. Though the State High Court upheld the prayers by Yari, Marafa proceeded to the Court of Appeal Sokoto where he got the judgment of the State High Court overturned. The matter of the validity of the APC primaries conducted by Yari died with the Supreme Court of Nigeria declaring that, the APC primary elections in Zamfara was not conducted in line with the laid down rules and that all votes cast for the APC were wasted votes (Ade 2018). The judgment also declared that, the candidates of the opposition Peoples Democratic Party as the second runners in the election are sworn in as the substantive winners of the election.

Though the expectation of the people is that, with the pronouncement by the Supreme Court, the crises in the Zamfara APC is laid to rest, but Yari and his political camp came up with a very stringent circumstance in the history of Nigeria’s judicial precedence when he re-approached same Supreme Court asking it to reverse its own judgment especially the consequential order which takes away the victory secured by the APC to the opposition Peoples Democratic Party. Though the prayers in the application for the review was also turned down by the apex court, the political debacle calls for intellectual debate as one of the unique political scenario in the history of electotal process in Nigeria since 1999.

The objective of this paper among others is to examine the extent at which lack of internal democracy among parties and single handed influence of few influential politicians create political crises within the party leading to an obnoxious political scenario of losing out an election victory to the second runner party and how it can serves as a lesson for the Nigerian politicians. The paper adopted mixed research methodology of literature review and field interviews to allow the writer access to verifiable facts for the purpose of analysis.

APC and 2019 Pre-Election Political Crises in Zamfara State

Though the atmosphere leading to the 2019 general election become tensed since at the beginning of the 2018 with the spates of political killings and murders going on across villages and communities in the state, the political speeches and utterances by Senator Marafa were clear indicators that, the crises would be too big to be contained (Abbas 2020). He took every steps of Yari’s leadership weakness to lambast at him

and capitalized on the failure of his government to secure the people and territory of Zamfara state as weapon of destroying Yari’s political chances in the state. At the time of the conduct of the APC state congress in Zamfara, Yari brought the political fight in the open when he attempted to manipulate the delegates who will virtually elect his anointed new party executives. Marafa objected the strategy of delegate nomination and at the end of the whole drama two parallel APC State Congresses were conducted with party executives from Yari’s camp led by Lawal M. Liman and the other camp led by Surajo Maikatako leading the Marafa camp (Bachiri 2020).

Yari and APC National headquarters failed to reconcile with Senator Marafa and the APC faction of Yari went further around August to come up with a comprehensive list of the APC aspirants for all elective positions. Neither Senator Marafa nor any of the other seven governorship aspirants were considered in the Yari’s list a situation that triggered the emergence of a political alliance called group of eight (G8). They formed an alliance within same APC structure in Zamfara and bows to frustrate any attempt by Yari to enforce the anointed list on the remaining aspirants (Bachiri 2020).

Table 1: List of APC Aspirants for the 2019 Governorship Elections in Zamfara State

S/ No	Names of APC Aspirants	Status
1	Kabiru Garba Marafa	Former Sen. Representing Zamfara Central
2	Mahmuda Aliyu Shinkafi	Former Governor of Zamfara
3	Bridg. Gen. Mansur Da-Ali	Former Minister of Defense
4	Eng. Abubakar Magaji	Retired Permanent Secretary
5	Dauda Lawan	Retired Executive Director First Bank Nig.
6	Sagir Hamida	Retired Director FCDA
7	Aminu Sani Jaji	Former House of Members House Reps

Source: As Compiled by the Author

The crises become tensed when the group of (G8) led by Senator Marafa organized a mega rally in Gusau the state capital to demonstrate their political strengths and level of popularity among the people. The aspirants and their thousands of supporters trekked more than forty kilometers from Zamfara entry at Yankara to Gusau Airstrip chanting different political slogans in demonstration of their political strengths (Hafizu 2020). During the rally Senator Marafa declared their political movement as “operation retire them all” referring to former Governor Yari and his anointed political aspirants. During the rally, Gusau the capital city of Zamfara

state was almost grounded hence overwhelming population stood on the express ways to show political solidarity to the politicians of the “G8” (Bachiri 2020).

As for Yari faction, three days after, they organized a counter political rally in honor of the anointed gubernatorial aspirant and all the anointed candidates under his political structure and also declared his own political movement as “operation no nonsense”. He was referring to the group of eight when he said during his speech that, “I have tagged this election as “no nonsense” we have made no mistake in anointing Alh Mukhtar Shehu Idris because it has been a tradition that, we anoint candidates at the end of our tenures. Former Governor Ahmad Sani anointed his then deputy Alh Mahmud Aliyu Shinkafi and we have raised no eye brow on that (Shehu. 2018), With parallel APC executives and too many governorship aspirants, APC went in to the preparation for the primary elections with no attempt for genuine reconciliation and with Yari as the state governor playing a dominant role between the APC National headquarters and the state structure of the party in Zamfara state. In the views of (Maryam 2020), Yari as seating Governor worked his ways to make sure that indirect primaries election was conducted in Zamfara but when that failed, he returns back home to manipulate the nomination of the party delegates.

Attempt by Abubakar Fari and Gen. Mustapha Gana led electoral committees to either reconcile the aspirants by producing a consensus candidates or agree on acceptable guidelines for the conduct of the direct party primaries for the APC failed hence the Governor insisted on using his own list of delegates while the other groups of “G8” were insisting on having an independent and neutral list which shall be produced by the party’s national headquarters. After series of meetings and consultations both at the office of the State Commissioner of Police in Zamfara and at City King Hotel the reconciliation failed hence neither of the factions could agree to the terms. Considering the time frame for the expiration of the period for submitting of the names of the candidates by parties to INEC, Governor Yari pull out of the venue of the meeting and declare that all APC supporters shall proceeded to their poling units for the conduct of the party primaries to be organized by the state party secretariat under his faction. The state Chairman of the APC Yari faction Lawal M. Liman chaired the committee and declared the result of same anointed candidates of Yari as the winners.

That, action did not go well with the National Headquarters of the parties and also some of the party stakeholders. The national leadership of the party led by Adams Oshiomhole admitted that no primaries was held but claimed consensus candidates have to be adopted within the stipulated time (Evelyn, 2019). Also the Independent National Electoral Commission objected to the claims that, the conduct of the party

primaries by Governor Yari was validly done and in line with the legal procedures. As argued by (Evelyn. 2019), consequently, the Independent National Electoral Commission (INEC) said it would not allow the APC field candidates in Zamfara State because the party did not hold primaries within the stipulated time. To corroborate this position many political observers argued that, the primaries conducted by the Yari faction of the APC is not valid hence the law empowers only the National Working Committee to conduct primaries through the electoral committee to be assigned. As argued by (Aishatu 2019). Section 87(2), (3), (4), (5), (6), (7), (8) and (9) make elaborate provisions for procedure that must be adopted by political parties who intend to hold primaries. Failure to comply with these provisions as well as the regulations of the political parties themselves would lead to nullification of the purported primaries.

The majority opinions held it that, the State Chairman of the party has no power within the electoral acts and party guidelines to conduct primaries. Lawal M. Liman the Chairman of All Progressive Congress Party in Zamfara State had no slightest power to conduct primaries and forward list of successful candidates to Independent National Electoral Commission. He acted illegally against his party’s Constitution and guidelines with respect to conduct of primaries. He had no authority or slightest business conducting primary elections and forwarding list of allegedly successful candidates including his name to Independent National Electoral Commission (Aishatu 2019).

But to justify his reason Yari approach Zamfara State High Court 111 to secure an order compelling INEC to shift from its established position and collect the list of the successful candidates that emerged victorious from the primary elections he conducted. After rigorous legal battle between Yari, Senator Marafa faction of the APC and INEC, the State High Court ruled that, the primary elections conducted by Yari faction of the APC was valid and in accordance with the laid down rules and guidelines and also ordered that, INEC accept the list of the Yari APC faction for inclusion in the general elections (Mukhtar 2020). Despite the appeal of the judgment by Senator Marafa faction of the APC, and also another contradictory judgment by the Federal high Court Abuja on same matter INEC has no option than to abide by the State High Court Judgment and include the candidates of Yari in the elections insisting that, there was no contradictory order from the appellate courts either.

Outcome of the 2019 General Elections in Zamfara State

The conduct of the elections in February and March 2019 saw the emergence of APC Yari faction as the overall winners of the elections with Governorship result declaring Mukhtar Idris who polled 534,541

votes to defeat his closest challenger, Bello Matawalle who polled 189,452 votes as the winner:

The outcome of the elections also led to the Yari faction of the APC winning three senatorial, seven house of representative, and twenty four seats of the state assembly posts.

With the declaration of the Yari faction of the APC as the winners of the elections, agitations on electoral empire INEC not to release the certificate of returns to the winning candidates especially by the Marafa faction of the APC and indeed candidates of the other opposition political parties that participated in the election went viral and INEC vows to the pressure of the Yari led APC and issued the announced candidates with their certificate of returns (Bachiri 2020). Evidences have shown that, the Governorship candidate of the Yari led APC Mukhtar Idris participated in the three days retreat for the newly elected Governors organized by the Nigeria's Governors Forum (Maryam 2020). Also, Yari and two other Senators elected as well as seven members of the Federal House of Representatives also participated in the retreat organized by the Nigeria's National Institute of Legislative Studies in preparation for their inauguration (Maryam 2020).

The Judicial Tussle and Supreme Court Verdict

Prior to the conduct of the 2019 general elections, Yari faction of the APC in Zamfara has approached the State High Court 111 to seek for an order instructing the electoral umpire and indeed the APC National headquarters to accept the list of candidates produced by Yari faction of the APC. As reported by (Daily News Times 2019) The case at the Zamfara State High Court 111 has the suit No: ZMG/G/52/18 with Sanusi Liman Dan-Alhaji & 37 others versus All progressives Party (APC) & 144 Ors as the named parties (Sen. Kabiru Garba Mafara and his camp were the 4th-144th defendants while Hon. Aminu Sani Jaji was the 145th Defendant. They plaintiff claims among Ors, were for the court to declare as lawful the primaries conducted by the state chapter of the APC and to mandate APC National and INEC not to recognize and accept the list of the successful candidates from the state chapter primaries (Daily News Times 2019).

Earlier than the suit filed by Yari, the Independent National Electoral Commission had communicated to the APC National headquarters that the party has failed to conduct valid primaries within the stipulated time as provided for by the law and that, the party may not participate in the 2019 general elections. Dissatisfied with the position of the INEC, the APC National headquarters filed a separate suit at the Federal High Court Abuja challenging the position of the electoral umpire of denying the chapter of the party in Zamfara from participating in the election. As reported by (Daily News Times 2019), All Progressive Party (APC) (National) on its part had also filed a case at the Federal high Court in Abuja in

suit No: FHC/ABJ/CS/1279/2018: All Progressive Congress V. Independent National Electoral Commission & 5 Ors) challenging the decision of the INEC for refusing to accept the list of its "consensus" candidates the party presented for Zamfara state. In the suit the APC claimed to have conducted primaries by consensus on the 7th of October 2018 at City King Hotel Gusau, Zamfara State and pray the court to declare null and void the act of INEC in refusing to accept the party's list of candidates for Zamfara State and Governor Yari's camp joined this suit as the 2nd to 6th defendants.

Though the two courts have coordinate jurisdictions they delivered two contradictory judgments in same day on the 25th of January 2019. As for the State High Court 111 presided over by Justice Bello Muhammad Shinkafi, he agreed with Yari's submission that the primary elections conducted by APC Zamfara was valid and that, INEC shall ensure inclusion of all APC candidates in the elections. As reported by (Daily News Times 2019), "Now on the strength of the evidence adduced by the plaintiffs, the evidence elicited from both DW1 and 2 during cross examination as well as the documentary evidence tendered and admitted in evidence, I am satisfied that, the plaintiffs proved their case against the defendants. Consequently therefore, the issue for determination formulated is hereby answered in affirmative and all the reliefs claimed by the plaintiffs are here by granted"

On the other hand, the Federal High Court Abuja Coram presided over by Justice Ojukwu. J. in dismissing the plaintiffs (APC) suit against INEC held as follows: "it is evident from a dispassionate perusal of facts contained in the affidavit of the parties, documents exhibited, submission of learned senior Counsel, oral and documentary and the law, that, at the close of the nomination for the 2019 general election, in accordance with the INEC time table as in exhibit INEC 1, the plaintiff has no candidates for the election, having failed to conduct primaries according to the electoral act and the constitution of the plaintiff Independent National Electoral Commission duly informed the plaintiff in exhibit APC6 a letter dated 9th day of October 2018 of this fact. This court is of the humbly but firmed opinion that, the decision of the INEC is not ultra vires its powers. She added that, "the decision of the INEC is in tandem with the law and will help in still discipline, obedience to due process among the political parties and their handlers in order to drive our democracy from nascent and fledging to palpable potency.

The Zamfara State and Abuja Division of High Court judgments placed INEC on serious dilemma hence the two courts of coordinate jurisdictions have issued contradictory orders all compelling INEC to act. However, INEC in a media briefing insisted that, it will abide by the Abuja high court judgment hence it has corroborated its earlier position except there was

an appeal setting aside the Abuja lower court judgment. But after intense legal debate by both parties, INEC succumb to pressure and accept the State High Court judgment and subsequently included all the candidates that emerges from the Yari's APC primaries. Senator Marafa on the other hand appealed the state high court verdict at the Sokoto Division of Court of Appeal. As reported by (Maiharaji 2019). "the appeal was filed by Senator Kabiru Marafa, Chairman Senate Committee on Petroleum (Downstream) and 129 others through his counsel Mr. Mike Ozhekome SAN and the respondents are Sanusi Liman Dan-Alhaji and 139 others represented by Mr. Mahmud Magaji SAN as lead counsel". Meanwhile, APC National headquarters on its own appeal the Abuja Federal High Court judgment insisting that, the position of the INEC which was corroborated by the court of not allowing Zamfara State chapter of the APC to participate in the elections need to be set aside (Maryam 2010).

After appearances and arguments by parties, the Sokoto division of the Court of Appeal strikes out the judgment of the Zamfara State High Court 111 on the ground that, available evidences were not dully and diligently considered by the trial court. Delivering the lead judgment which was adopted by two other Court of Appeal justices, Tijjani Abubakar and Jamilu Tukur, Justice Tom Yakubu held that, the lower court failed in its duty to properly evaluate the evidences before it. Yakubu said, judges have the legal power to produce judgment and reach decisions with reason, noting that, in the instance case, it was not done. "I am convinced that, the lower court has failed to evaluate the evidence before reaching the decision (Maiharaji 2019).

Out rightly also the Abuja Division of the Court of Appeal delivered its judgment on the appeal by the National headquarters of the APC where it struck out the judgment of the Federal High Court on the ground that, the appeal by the National headquarters of the APC was filed out of time. As reported by (Alex 2019) "For the fact that, the suit at the Federal High Court was filed 15 days after the cause of action had arisen rendered it incompetent. The appellate court subsequently set aside the order of the lower court barring APC in Zamfara State from participating in the 2019 general elections".

De-satisfied with the whole scenario, Yari and his faction of the APC heads to Supreme Court to seek for interpretation of the judgment of the Court of Appeal Sokoto Division which he said failed to make any order or pronouncement regarding the candidates of the APC elected. As reported by (Channels 2019), it is better for us to go to the Supreme Court so that the court can be able to explain what the judgment is about. In the entire judgment there is no order or directive of what to be done or what not to be done. Yari also noted that, the judgment did not make any pronouncement regarding the National and State

House of Assembly elections in the State. After several appearances by parties and presentation of evidences, the Supreme Court upheld the verdict of the appellate court Sokoto division invalidating the primary elections conducted by Yari faction of the APC and also declared the participation of the APC candidates in Zamfara as null and void.

On the long run the Supreme Court laid the whole matter to rest when it upheld the position of the Sokoto Division of the Court of Appeal by declaring the primary elections conducted by Yari as nullity, In a lead judgment delivered by Justice Paul Galinji in Abuja, the Supreme Court held that APC and its candidates did not conduct lawful primary elections in Zamfara State for the 2019 general elections. Galinji said that, INEC should not have recognized the candidates of the APC in the election and ruled that, candidates of other political parties that scored the second highest votes in the elections as well as the required spread should be declared winners of the various polls (Innocent 2019). In other narrations, Ade (2019) reported that, Justice Paul Galinje who read the lead judgment upheld the decision of the Sokoto Division of the Court of Appeal to the effect that, the APC did not conduct any valid primary election and as such had no candidate for any of the election in the state. He described the votes polled by the APC candidates in the elections as wasted adding that, the party and the candidates with the second highest votes and the spread in the various elections were the valid winners. Speaking during an interview with journalists after the judgment, a lawyer, Mike Ozekhome told journalists that the consequential order made by the apex court affects both governorship and National Assembly elections in the state. Consequently, Mr Yari's preferred candidate, Mr Idris, who polled 534, 541 will now be replaced by the candidate of the PDP, Bello Mutawalle who came second in the elections, with 189,452 votes (Evelyn 2019).

The judgment paved way for the people's Democratic Party (PDP), its Governor Bello Muhammad Matawalle and his Deputy Mahadi Aliyu Gusau, three senatorial candidates namely, Hassan Muhammad Nasiha representing Zamfara Central, Sahabi Alh Ya'u, representing Zamfara North, Lawal Hassan Anka representing Zamfara West, all the seven members of the Federal House of Representatives, twenty three members of the State House of Assembly and one member of the State House of Assembly from National Rescue Movement (NRM) to be sworn in and inaugurated at their respective elective posts in May and June 2019 respectively.

Appeal for Review

As if the matter is laid to rest after six and a half months of the inauguration of the PDP government in Zamfara, Yari raised a fresh legal battle over the Supreme Court verdict which transfers the victory of

the faction of his APC to the PDP by filling an application for the review of the judgment. In the argument of Yari's lead counsel Mr Robbert Clerk a Senior Advocate of Nigeria insisted that, there are more that needs to be clarified in the judgment of the Supreme Court as it affects Zamfara APC crises.

Though, many lawyers have shared their opinions when the matter of the review of Zamfara case comes up. Lawyer Danniell Bwala in a Channel TV discussion, insisted that, "in the case of Yari of Zamfara State, the Supreme Court did not only disqualified the candidates of the APC but went further to give pronouncement that, "votes cast for the APC in Zamfara were wasted votes". He insisted that, by implication the Zamfara matter is considered determined. Also corroborating this position, Lawyer to Senator Kabiru Garba Marafa Mike Ozekhome SAN, argued that, the position of the Supreme Court on any matter once decided is final unless on issues that borders around the provision of order (8) rule (16) of the Supreme Court Practice Direction. The provision of the order states that:

"The court shall review any judgment once given and delivered by it saves to correct any clerical mistakes or some errors arising from any accidental slip or omission or to vary the judgment or order so as to give effect to its meaning or intention"

But Yari's Lawyer Mr. Robbert Clerk insisted that, they have approached the Supreme Court for the second time after the matter was determined not because they are challenging the substantial judgment. Their concern is the consequential order made which takes away the victory of their party to the PDP. As reported by (Evelyn 2020) according to Mr Clerk, the APC approached the apex court a second time to contest the consequential orders made during the judgement in May, "because his clients believed that the apex court lacked jurisdiction to make the said consequential orders at the time".

The calls for review of the Supreme Court verdict by Yari and his faction of the APC, influenced other similar applications by Emeka Ihedioha and PDP Imo challenging the judgment of the Apex Court which handed down the victory of their party to Sen. Hope Uzodinma of the APC as well as Lyon and APC Bayelsa chapter of the APC challenging same Apex Court judgment which handed over their victory to Senator Diri of PDP. The Supreme Court had earlier struck out the applications for the review of Imo and Bayelsa judgment with strong warning by the Apex Court judges that "their position on matters once determined by the court is final and their finality is absolute. Delivering one of the judgments in respect of Bayelsa Application Justice Amina Augi declared "this court is not authorized and lacks jurisdiction to review its judgment except on the circumstances spelt in order (8) rule (16) of the rules of this court". She added "it is settled that, the decision of this court is

final, this is final court and its decisions are final for all ages" (Anka 2020).

At the resume hearing of the review for Zamfara on Monday the 2nd day of March 2020, the Apex Court struck out All Progressive Congress application for review of its own judgment which nullifies the victory of all the party's candidates at the 2019 general elections held in Zamfara State on the ground that, the application according to Justice Olabode Rhodes-Vivour who led the five-man panel was that "the application was incompetent as the complete judgments of the apex court comprising all the judgment of the five members of the panel being contested by the party were not attached to the application. The applicant only attached the lead judgment and failed to exhibit the consenting judgments of the four other members of the panel which gave the Monday May 24 2019 verdict. (Ade 2020).

After second and third appearance by Yari's counsel Robert Clark, the apex court struck out the application just like that of Imo and Bayelsa insisting that, it lacks the powers to review its judgment once delivered. Though in the case of Zamfara there was a dissenting judgment by one out of the five members of the panel of the Supreme Court judges, the application was finally rejected bringing the matter to a final end.

Lessons for the Nigerian Politicians

The Zamfara political journey in the 2019 general elections provided some good number of lessons that shall be learn by the Nigerian politicians. Superior among them is "believing in the supremacy of the judicial system and holding to its powers to challenge political injustice. Other lessons to be learned include:

- It strengthens respect for the supremacy of the Nigeria's Apex Court being the final court of the land in determining electoral cases.
- It helps political parties in Nigeria to learn to enhance internal party democracy and respect for both the rule of law and constitutions of their respective political parties.
- It sent a strong warning and message to the Nigerian politicians that, no one no matter how highly placed he is can take Nigerian democracy and judiciary for granted.
- It teaches Nigerian politicians the significance of endurance in following through judicial hurdles to get justice.
- It erases the impression that, ruling parties always take advantage of the power of incumbency to influence the outcome of the judicial verdicts especially on matters bordering election petitions.
- It teaches Nigerian politicians that, securing victory at the trial courts may not be an end to electoral litigation hence the appellate

courts may upturns what they deemed is not in tandem with the statutory laws of the land.

- It also teaches Nigerian politicians that, being an opposition cannot block your chance of emerging victorious at the end of the whole political processes as the case may be with Matawalle and PDP in Zamfara State.

Conclusion

This paper has captured in historical and clear perspective the political crises that characterized the political atmosphere of APC Zamfara State since the commencement of the 2019 electoral processes in Nigeria. It has established in clear terms how the action of an individual within same political party the APC in the state cost the party a very severe political battle which terminated up to the Supreme Court of Nigeria and even with a fresh move to calls for review. It has established how political resilience by Senator Marafa led to the application of judicial justice that brought PDP at the helm of affairs of the leadership in the state. The lessons for the political development of the state has set out a clear political precedence for the Nigerian politicians to learn to respect the rules of the party especially the constitution of the party as well as the electoral act of Nigeria in nominating candidates for elective positions.

References

- [1] Abubakar A. M (2019), Its Official: APC's Muktar Idris Wins Zamfara Governorship Election, (Online Version), *Premium Times news Paper*, retrieved from <http://www.premiumtimesng.com> 29th February 2020.
- [2] Abbas M. (2020), Interview Conducted at his Residence in Talatar Mafara Local Government Area of Zamfara State, 22nd January 2020
- [3] Ade A. (2019) Supreme Court Nullifies APC Candidates' Elections, Declares PDP Winner of Zamfara Polls, (Online Version) *punch News Papers*, retrieved from <https://punchng.com/just-in-appeal-court-nullifies-zamfara-apc-primaries-for-gov-assembly-elections/> 29th of February 2020.
- [4] Ade A (2020) Supreme Court Strikes Out APC's Request for Review of Judgment on Party's Candidates in Zamfara, (Online Version), *Punch News Papers*, retrieved from <https://punchng.com/supreme-court-strikes-out-apcs-request-for-review-of-judgment-on-party-candidates-in-zamfara/> 22nd February 2020
- [5] Aminu N. (2019) Zamfara APC crisis: Matters Arising, (Online Version), *Blue Print News Paper*, retrieved from <https://www.blueprint.ng/zamfara-apc-crisismatters-arising/>, 22nd February 2020.
- [6] Aishatu N (2019), Legal implication of Zamfara APC primaries' nullification, (Online Version), retrieved from <https://aishatunkeki.com/2019/04/legal-implication-of-zamfara-apc-primariesnullification/> 27th February 2020
- [7] Alex E. (2019), Appeal Court Okays APC Candidates' Participation in Zamfara Elections, (Online Version), *This Day News Paper*, retrieved from <http://www.thisdaylive.com> 27th February 2020.
- [8] Bachiri S. F. (2020), Interview Conducted at his Residence in Bungudu Local Government Area of Zamfara State, 13th January 2020
- [9] Daily News Times (2019), High Court Judgment: Zamfara APC Governorship Aspirants Fault Yari's Appeal, Seek NJC Intervention, (Online Version), retrieved from <http://www.google.com>, 22nd February 2020.
- [10] Evelyn O (2019) Why Supreme Court ruled against APC in Zamfara, (Online Version), *Premium TimesNewspapers*, <https://www.premiumtimesng.com/news/headlines/331517-why-supreme-court-ruled-against-apc-in-zamfara.html> 22nd February 2020.
- [11] Evelyn O (2019) Zamfara: APC Vows Third Return to Supreme Court, (Online Version), *Odubawa Online News*, retrieved from <https://www.premiumtimesng.com/news/headlines/342405-zamfara-apc-vows-third-return-to-supreme-court.html>, 22nd February 2020
- [12] Hafizu M. (2020), Abbas M. (2020), Interview Conducted at his Residence in Kaura-Namoda Local Government Area of Zamfara State, 2nd January 2020
- [13] Innocent O. (2019), ANALYSIS: Zamfara: Supreme Court's Verdict And Matters Arising, (Online Version), *The Next Edition Online Newspaper*, retrieved from <https://www.nextedition.com.ng/analysis-zamfara-supreme-court-verdict-and-matters-arising>, 25th of February 2020
- [14] Maiharaji A (2019), Appeal Court didn't Clear Zamfara APC for Elections —Marafa's lawyer, Ozekhome (Online Version), *Punch News Paper*, retrieved from <https://punchng.com/appeal-court-didnt-clear-zamfara-apc-for-elections-marafas-lawyer-ozekhome-insists/> 27th February 2020
- [15] Maiharaji A. (2019) Update: Appeal Court Nullifies Zamfara APC Primaries for Gov, Assembly Elections, (Online Version) *Punch News Paper*, retrieved from <https://punchng.com/just-in-appeal-court-nullifies-zamfara-apc-primaries-for-gov-assembly-elections/> 29th February 2020
- [16] Maryam L. M (2020), Interview Conducted at his Residence in Gusau Local Government Area of Zamfara State, 15th January 2020
- [17] Mukhtar S. (2020) Interview Conducted at his Residence in Talatar Mafara Local Government Area of Zamfara State, 22nd January 2020
- [18] NAN (2018), Gov. Yari Claims APC Primaries Conclusive, (Online Version) *Pulse News* retrieved from <https://www.pulse.ng/news/politics/in-zamfara-gov-yari-claims-apc-primaries-conclusive/e3sl3kc> 22nd February 2020
- [19] Shehu U (2019) Governor Yari Tags Zamfara Governorship Primaries "No nonsense", (Online Version), *Daily Trust News Papers*, retrieved from, <https://www.dailytrust.com.ng/governor-yari-tags-zamfara-governorship-primaries-no-nonsense.html>, 22nd February 2020
- [20] TVC News (2019) Court upholds Zamfara APC primaries, (Online Version) retrieved from <https://www.tvcnews.tv/court-upholds-zamfara-apc-primaries/> 27th February 2020
- [21] Yiaga Africa (2018), Party Primaries and Matters Arising Ahead of the 2019 General Elections In Nigeria, (Online Version), retrieved from, <https://www.yiaga.org/party-primaries-and-matters-arising-ahead-of-2019-elections-idris-mohammed/>, 25th February 2020