Book Review Chieftaincy Institution Among the Kalabari Ijaw by Chief (JUSTICE) A. G. KARIBI-WHYTE Published with Ulamba Publishers 2018, ISBN: 978-978-530-65-3-8

REVIEWED BY DR. Z. ADANGOR,
PhD (Aberdeen), BL., MCIArb; Associate Professor,
Department of Public Law, Faculty of Law,
Rivers State University, Port Harcourt, PMB 5080 Port Harcourt

A Book Review is not merely a report on a book or a summary of its contents. Rather, a book review is a critical essay that evaluates the contribution of the work to knowledge on the subject matter in question. It examines the extent to which the author has established the hypothesis on which his work is founded thus revealing the strength and/or weakness of the work. In furtherance of these objectives, the book reviewer is required to think critically about the contents of the book without being uncharitable to the author because no intellectual work put together in a book could be said to be completely worthless.

In order to undertake a meaningful book review, the objectives that informed the writing of the book, the sources of information or data relied on by the author, the contextualization of the discourse, the author's background in relation to the subject matter dealt with and his style of presentation constitute critical materials that the reviewer must examine closely.

Fortunately for me, the learned author of the book has set out in the forward to the book, the primary objectives for writing it. According to him, the work was motivated by the following considerations: first, to fill an obvious vacuum in the literature on chieftaincy institution among the Kalabari Ijaw.

Secondly, to restore the lost esteem of the status of chieftaincy among the Kalabari and to seek to reverse its slide into irrelevance in all aspects of governance. Finally, to restore the pristine esteem of the chief in modern day Kalabari society.[1]

It is against the above defined objectives that this review will be undertaken with a view to ascertaining whether or not they have been achieved. To be sure, the learned author, apart from being a "participant observer of the Kalabari chieftaincy institution" and current Head of Wariboko Group of Houses in Abonnema, is not a stranger to research on chieftaincy institution among the Kalabari Ijaw. As far back as 1974, he had contributed a chapter to a publication by the Institute of African Studies, University of Nigeria, Nsukka where he wrote on the title "Chieftaincy among the Kalabari: the Decadence of an established Aristocracy"[2]

Furthermore, there is no doubt also that the learned author, had during his long period of service on the Bench, particularly the Supreme Court Bench, dealt with several chieftaincy matters emanating from different parts of Nigeria which clearly equipped him for the arduous task of putting this work together.

The 353 paged book has eleven chapters with a bibliography and an appendix. The main thrust of the work is to trace the origins of the chieftaincy institution among the Kalabari Ijaw of the Niger Delta Region of south-south Nigeria, particularly the pristine position of that institution as the central point and hub of the Kalabari society. To borrow the words of the author at page 1 of the book, the chieftaincy institution has been accepted as the 'central point and hub of Kalabari Society' and the 'anchor of its political organization'. The Chieftaincy institution vests in the incumbent the title of **"*Alabo*",** that is Chief, which is the highest social and political status attainable among the Kalabari people. A chief among the Kalabari Ijaw is the traditional head or leader of a family, chieftaincy house, group of chieftaincy houses or community. The attainment of the status of chief, signifies the climax of political, social and economic success of the incumbent.

The author is however, quick to point out that the imposition of foreign rule on the Kalabari people by the British colonial power and the subsequent emergence of the Nigerian nation state moulded from disparate ethnic groups and nationalities have interplayed to weaken the status of the chieftaincy institution and robbed it almost completely of its past glory. In other words, the chieftaincy institution has fallen into irrelevance and lost its dominance in the political, economic and social spheres of the Kalabari society. Kalabari citizens who hitherto, were subject to the unquestionable jurisdiction of their chiefs whether at the family, house or ward levels now appear to dominate their chiefs in the society.

It would appear therefore, that the primary focus of this book is to re-establish the chieftaincy institution as the anchor, hub and fulcrum of the Kalabari society and this central theme has been well presented with masterful meticulousness and precision in Chapters One-Five.

Unarguably, this is a very tall order because the present constitutional structure of the Nigerian Federation as spelt out in the Constitution of the Federal Republic of Nigeria, 1999 (as amended) is erected around the three

[1] Forward, vii.
[2] ibid

organs of government, namely the executive, legislature and judiciary.[1] In the extant constitutional structure of government, the chieftaincy institution is conspicuously missing and no reference is made to it in the 1999 Constitution. Even at the local government level, at least in Rivers State, democratically elected Chairmen and Councillors of local government councils, rather than chiefs are entrusted with the task of governance and are answerable directly to the people[2].

The present constitutional position contrasts sharply with the position under Nigeria's First Republic where the chieftaincy institution was recognised and the jurisdiction of courts of law to entertain any chieftaincy question was ousted by section 161 (3) of the Constitution of the Federation of Nigeria, 1963.[3] Indeed, the regional governments in Nigeria's First Republic actually established their respective Houses of Chiefs as the second chamber of the Regional legislature.

What the extant constitutional structure means in practical terms is that without constitutional amendments and re-engineering of our present structure of government to re-integrate the chieftaincy institution, the primary task which this book seeks to accomplish of re-establishing the chieftaincy institution as the anchor and hub of political organization in Kalabari society may remain a mirage.

Curiously, the book is silent on the need to alter the extant 1999 Constitution so as to secure a special role for the chieftaincy institution. Our position is not weakened by the suggestion made by the author on page 313 of the book that only 'a drastic and realistic reappraisal of the role of the chieftaincy institution can restore some of its lost glory'. The reader is not told what form the realistic reappraisal should take or how it should be pursued.

Although the author has argued strenuously on page 313 of the book that no system of government can remain permanent and progressive unless it is rooted in the framework of the particular indigenous society in question, he concedes readily on the same page 313 that due to the altered political and economic circumstances to the disadvantage of the chieftaincy institution, 'it is almost impossible to return to the *status quo ante*'. This is the crux of the matter!

The chieftaincy institution reigned supreme prior to and during colonial rule and up until the attainment of Nigeria's political independence in 1960. During this golden era, the chieftaincy institution had flourished in most indigenous Nigerian societies. In Kalabari land, for instance, the chieftaincy institution flourished and amassed enormous wealth through its involvement in slave trade as chiefs acted as middlemen between slave traders from the hinterland and European traders on the coast. Furthermore, the chieftaincy institution constituted the primary trading unit and subjects of the chiefs including their slaves, participated in the coastal trade and thereby generated wealth for the institution. At page 85 of the book, the author noted that:

> The leaders of the community being the chiefs controlled and dominated the trade in all aspects. Men were exchanged for goods, and for more men. Consequently, they expanded their units, and increased their power. With the increase in their power and monopoly in the means of acquisition of wealth, the chiefs were more capable of controlling the people under them.

Continuing, the learned author further noted on page 86 that:

> The attitude of the trading companies helped to consolidate the powers and control of the chiefs over their subjects. No person had the right to trade directly with the European merchants except through one of the chiefs. And a trader was obliged and indeed bound to pay commission to his chief in respect of his turnover. These commissions were largely the source of the chief's wealth and the amount involved depended upon the number of successful traders trading under and in his name. With such tremendous increase in wealth, the Chiefs during the era of European merchants became more powerful.

Clearly, the foundation of the dominance of the chieftaincy institution during the period under reference as admitted by the author was its command and control of human and material wealth. The question that arises from this historical background is thus: Can this foundation be restored to enable the chieftaincy institution regain its lost glory? I doubt and very seriously too**!** Clearly, the restoration of the lost glory of the chieftaincy institution in Kalabari land faces a seemingly insurmountable challenge because without control over men and wealth, the *status quo ante* cannot be restored.

Besides, the establishment of a constitutional structure of government has altered the power equation to the disadvantage of the chieftaincy institution as power and authority are now entrusted to elected representatives of the people including political office holders. It is almost inconceivable to imagine that the Federation of Nigeria could slide to that period of her history when chiefs and other traditional rulers held sway in most indigenous communities and provided governance in accordance with applicable customary law.

[1] Constitution of the Federal Republic of Nigeria, 1999 (as amended), sections 4, 5 and 6 (hereinafter "1999 Constitution").
[2] 1999 Constitution, s. 7.
[3] No.20 of 1963 (Republican Constitution).

I am not by any means suggesting that the chieftaincy institution should not be strengthened for better service delivery to our people, particularly in our rural communities in the areas of crime detection and prevention, maintenance of law and order, cultural revival and modernization. No! The chieftaincy institution is indispensable in the restoration of peace and order in most of our troubled communities. Chiefs could work more closely with the local population and security agencies in the maintenance of law and order with far more greater success than the security agencies could achieve acting alone. However, the point being made here is that a restoration of the system where chiefs held the commanding heights in the political, social and economic spheres of our society does not appear feasible either now or in the near future.

With the foregoing introductory comments, my task now is to look at some specific chapters of the book that deal with its central thesis of repositioning the chieftaincy institution for participation in governance in the present day Kalabari society.

In pursuing the central thesis already set out, the learned author has argued in Chapter Six of the book that the chief being the undisputed custodian and repository of the custom, culture and tradition of his people and the embodiment and representation of his ancestors cannot be excluded from participation in the local government administration.

However, after examining the provisions of section 7 of the 1999 Constitution, the author concluded that the mandatory constitutional prescription for operation of the local government system in Nigeria *is a democratically elected local government council*. This conclusion which is supported by the clear provisions of section 7 of the 1999 Constitution and several decisions of the Supreme Court completely weakens the force of the learned author's contention that chiefs cannot be excluded from direct participation in local government administration. [1]

The truth of the matter is that since the chieftaincy institution in Kalabari land, like every other part of Rivers State is not democratic, the institution of chieftaincy cannot constitutionally speaking, claim any right of direct participation in the administration of local government councils. In other words, the mandatory requirement in section 7 of the1999 Constitution that the system of local government guaranteed by the Constitution shall be by democratically elected local government councils indisputably excludes the chieftaincy institution from direct participation in the administration of local government councils.

It is further argued by the author on page 148 of the book that the 'common interest of the community and the traditional associations of the community cannot be satisfied without the participation of the chiefs in the community' in the administration of local government councils. While the above weighty submission cannot be dismissed casually, it would appear that the preservation of the dignity and status of the chieftaincy institution is better guaranteed and assured through its exclusion from direct participation in the administration of local government councils. This however, does not preclude the elected chairmen and councillors of the different local government councils from consulting and receiving useful advice from chiefs with respect to matters affecting the general wellbeing of their people. It is our humble view that the chieftaincy institution is better off playing purely advisory role in local government administration.

In this regard, section 3 of the Rivers State Traditional Rulers' Law, 2015[2] provides that the functions of the Rivers State Traditional Rulers' Council established under section 1(1) of the Law shall include advising the Governor on any matter relating to: (a) customs and traditions; (b) inter-communal relations; (c) chieftaincy affairs; (d) the maintenance of public order within the state; (e) resolution of chieftaincy dispute; and (f) any other matter as the governor may direct. A similar advisory role is assigned to the Local Government Area Council of Traditional Rulers under section 24 of the law.

The learned author has criticized the advisory functions assigned to traditional rulers who are members of the Rivers State Traditional Rulers' Council and the Local Government Area Council of Traditional Rulers as being inconsistent with the Kalabari system of traditional administration. In driving home his argument, the learned author submitted on page 164 of the book that:

> The Chieftaincy Institution should not merely be restricted to the advisory jurisdiction allotted to it which it now occupies. The institution should be accorded its rightful place to enable it exercise its inherent traditional role in the society.

For the reasons already set out above, the above view cannot be supported. The Chieftaincy institution can only play an advisory role to the democratically elected government with respect to matters concerning native law and custom and the general development of our local communities. The institution of chieftaincy is ill-equipped to participate directly in governance at any level.

Chapter 7 of the book deals with the concepts of rights and law in traditional Kalabari Society. This chapter is indeed a jurisprudential exposition into the nature of law and custom of the Kalabari nation-state in pre-colonial and post-colonial Nigeria.

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[1] Governor Ekiti State v. Olubunmo [2017] 3 NWLR (Pt.1551) 1 @ 34-35; Eze v. Governor Abia State [2014] 14 NWLR (Pt.1426) 192; A-G., Plateau State v. Goyol [2007] 16 NWLR (Pt.1059) 57

[2] No. 4 of 2015.

The Kalabari notion of the concepts of rights and powers is that rulers are chosen invariably from the lineage which can trace its origin to the founder of the community, village or House. Thus, power and authority in Kalabari political thought are derived from God Almighty and from other gods. Hence the authority of the ruler is both legitimized and limited by the myth of descent and not by any other consideration.

The Kalabari Chief is not autocratic because the philosophy behind the creation of the chieftaincy after all is to improve on the house rule system and to develop the Kalabari nation. Every successive chief of a House is therefore expected to improve on the wealth and fortunes of the House. He is expected to uphold the tradition of the ancestors and expand the wealth of the House in men and materials. He is to increase the good image and prestige of the House. A ruler is presumed to be an epitome of rectitude and justice. He is the symbol of authority in his community and legitimacy of his people. There is accordingly a logical and natural correlation between the rights and duties of the chief and those of his subject. The authority of the chief to issue command is validated by the reciprocal duty of obedience by his people which is based on general perception that acceptance of the authority of the chief is for the general good of the society.

It is submitted that the reciprocal relationship between the chief and members of his chieftaincy House or community imposes a duty on the chief to account to his people for the exercise of his traditional authority. Unfortunately, the chapter does not indicate how members of the chieftaincy House could enforce the duty to account against their chief because without an enforcement mechanism the duty to account will remain to a bare right that avails nothing.

In chapter 8, the author posited that the organization of the Kalabari society in all its ramifications is anchored on the chieftaincy institution and in particular, that chiefs play a central role in the acquisition, ownership, possession and alienation of land.

It is argued in this chapter that under Kalabari native law and custom, the principle established in the celebrated case of *Amodu Tijani v. Secretary, Southern Nigeria*[1] relating to the status of the family head in land ownership, administration and disposition does not apply to the Kalabari Society because the family head *per se* in Kalabari society does not enjoy any defined legal status. In any event, a person cannot be a family head in Kalabari society unless he is also a chief. The chieftaincy therefore, is the only unit of land holding in Kalabari nation – state. Land owned by the community is held by the chief in trust for the community because the legal status of the community is vested in the chieftaincy.

The author also made the interesting point that the concept of fee simple absolute in possession, that is, the ultimate interest or dominium capable of being held in land, is known to Kalabari land holding system. Thus, under Kalabari native law and custom, the fee simple could vest in the original founder of land such as the Amanyanabo, Polo Dabo or Wari Dabo. The application of the concept of fee simple absolute in possession under Kalabari native law and custom implies that whilst the chief is the ultimate owner of land, every other holder enjoys limited title derived from the chief. It would therefore appear that the vesting under the Land Use Act, 1978[2] of radical title in the governor over land comprised in each State of the Federation on the one hand, and possessory title in individual land holders on the other hand, is similar to the Kalabari land holding system.

The primacy of the chief in land ownership and administration under Kalabari land holding system also vest the chief with the power of revocation of individual land holding where a serious misconduct or breach of the terms of the holding has been committed by the holder.

It is submitted that the coming into force of the Land Use Act, 1978 has altered the Kalabari indigenous land holding system because the radical title in and over every piece of land within the Kalabari nation state is no longer vested in the Amanyanabo, Polo Dabo or Wari Dabo. To be sure, that radical title vests in the Governor of Rivers State and the interest held in land even by the chiefs themselves is merely possessory.[3]

Chieftaincy and the judicial system is the focus of Chapter 9. The theme of this chapter is that the administration of justice is an inherent and inextricable function of the chieftaincy institution in Kalabari Society. The chief acting with members of his House-in-Council is vested with the judicial power to adjudicate on matters between members of his house or ward. The position of the Kalabari chief as an adjudicator was recognized both by the Royal Niger Company and the British Government on the establishment of the Statutory Native Courts. This recognition was implicit in the colonial policy of preservation and non-interference with the indigenous system of administration of justice except such interference was necessary to prevent injustice or check abuse of power by the chief.

Given that the administration of justice presupposes the existence of a legal system with a set of enforceable laws, the author has in a very convincing manner criticised the consistent and sustained denial by Western writers that African Law is law properly so called. It was argued that African Indigenous societies including the Kalabari nation-state distinguish between rules of custom observed by them and rules of law enforceable by the society and that the view that laws in Africa consisted of non-enforceable custom is misconceived. One cannot

[1] (1921) AC 339.
[2] Cap. L5, Laws of the Federation of Nigeria 2004.
[3] See Section 1 of the Land Use Act, 1978

agree more!

The author has also criticised the use of the phrase "customary law" to describe African Laws. According to him, custom and law are mutually exclusive because whereas custom is voluntarily obeyed and does not require compulsion for its observance, law is invariably backed by sanction. However, custom may transform into law when non-compliance with a particular rule of behaviour is backed by sanction. Therefore, the idea of customary law is jurisprudentially incorrect because no single conduct requires voluntariness and compulsion for its enforcement. The author concludes by submitting that the Kalabari nation-state has both laws and custom, rather than customary law.

Another issue addressed in this chapter is the controversy over the question whether indigenous African Laws recognized the distinction between offences that must be punished and supressed in the corporate interest of the community and those that affect only personal and private interest. It is argued by the author that the Kalabari traditional legal system recognises this distinction by leaving certain offences to be punished by the community while others are left to be redressed by the victims.

A significant defect identified by the author in the Kalabari indigenous judicial system is the absence of formal institutions for the exercise and enforcement of the powers traditionally vested in the chiefs. There are no designated officials or law enforcement personnel to arrest, investigate and prosecute persons accused of violation of the law or to enforce decisions made by the chiefs or other arbitral panel. Accordingly, all activities associated with the apprehension and investigation of a suspected wrong doer are left to the ability and willingness of other law abiding members of the society.

One aspect of the Kalabari judicial system deserves special mention. Adultery committed by an ordinary member of the Kalabari society with the wife of a Kalabari chief is treated as a serious offence whereas adultery committed by a chief with the wife of a non-chief is not treated as a serious misconduct deserving of collective action by the community. Since a chief once installed may remain a chief until death, it would appear that the indigenous judicial system confers perpetual immunity on chiefs with respect to sexual misconduct which does not augur well for the moral wellbeing of the society.

Secondly, where a slave murdered a free born, the victim's family was entitled to demand from the family of the slave accused of the offence, not merely his surrender but also another person from the slave's family who is considered to be of equivalent status with the victim in exchange for the victim. The moral or legal issue that arises from this judicial system is how could an innocent member of the family to which the slave belonged be exchanged for the victim of a criminal act committed by the slave? Secondly, how could the status of the victim and that of the member of the slave family given in exchange be measured? These are posers that the author did not address.

In terms of procedure, the Kalabari indigenous judicial system is akin to the English Common Law Jury System except that the Kalabari chiefs and elders who constitute the adjudicatory panel deal with both facts and law unlike the English Jurors who deal with only facts.

It is interesting to note that the Kalabari indigenous judicial system recognises the right of every party to fair hearing and accordingly no decision is reached without affording parties the opportunity to present their respective cases. The grant of preservative order of interim injunction in deserving circumstances particularly in land matters is also recognised under the system as well as the exercise of a right of appeal to a higher authority.

It is indisputable that the exercise of the above judicial powers by Kalabari chiefs has largely been taken away by statutory provisions. For instance, under Section 60 (2) of the Rivers State Customary Courts Law, 2014 chiefs can only arbitrate in civil matters between disputing parties. Similarly, no chief can exercise criminal jurisdiction over any conduct as customary criminal law is unknown to Nigerian Law.[1]

Even where a breach of customary law occurs, a chief lacks the authority to try the suspect because by virtue of Section 11(1) of the Rivers State Customary Courts Law 2014, the power to impose punishment for breach of any rule of customary law is vested in the Customary Court provided that the punishment shall not involve cruelty, mutilation, torture, other personal violence or any other act which is inhuman, degrading or repugnant to natural justice and humanity.

The learned author has criticised the exclusion of chiefs from appointment as chairmen or members of Customary Courts as a matter of right. While it is conceded that the Rivers State Customary Courts Law 2014 has completely abolished the appointment of lay persons as chairmen of Customary Courts in Rivers State, a chief is still eligible to be appointed as a member of a customary court provided that he is a graduate of any discipline and must have graduated for not less than five years as at the date of his appointment.[2]

Arguably, it is inconceivable to appoint a legal practitioner to sit as a member of a customary court chaired by a chief who is not a legal practitioner. A legal practitioner is most qualified to serve as Chairman of a customary court under our law. The submission of the learned author that a 'situation where an inconsequential

[1] Section 36(12) of the 1999 constitution; Aoko v. Fagbemi [1961] ANLR 416 @ 418-419; James v. Okereke [2008] 13 NWLR (Pt.1105) 544 @ 573-574.

[2] See Section 2(1), (2) (a) & (b) and (3) of the Rivers State Customary Courts Law, 2014.

or insignificant member of the society was appointed chairman or member of the court does not infuse confidence in the institution' appears with deepest respect, insupportable in law if the said chairman or member is a legal practitioner.

In any event, by virtue of section 88(1) of the Rivers State Customary Courts Law 2014, where it becomes necessary in a matter before a Customary Court to ascertain an alleged change in the custom of the community on an issue, the Customary Court has power to summon, for the purpose of giving evidence, any chief to establish the current position of that fact. It is clear from the above provision that chiefs could be summoned by the Customary Court to give evidence on any change in a rule of customary law so as to guide the court on that issue.

However, one agrees with the author that since the members of the Customary Court are presumed to know the customary law in force within the area of jurisdiction of the court, it will be defeating the essence of the establishment of Customary Court to appoint persons who lack sufficient knowledge of the applicable customary law as members of such court.[1] It is respectfully suggested that the Rivers State Customary Courts Law 2014 should be amended to make specific provisions for the appointment of chiefs as members of the customary court.

Chapter 10 deals with settlement of chieftaincy disputes. Prior to the coming into force of the 1979 Constitution, no court of law had the jurisdiction to entertain or determine any suit that involved a chieftaincy question.[2] To be sure, a 'chieftaincy question' was defined under section 165(1) of the same constitution to mean 'any question as to the validity of the selection, appointment, approval of appointment, recognition, installation, grading, deposition or abdication of a chief". The rationale for the ouster of court's jurisdiction over chieftaincy question was the notion that chieftaincy was a mere dignity or position of honour incapable of enforcement by judicial process.[3] It was also thought that the ouster of jurisdiction of the court will ensure peaceful and orderly administration in the country.

However, having regard to the provision of sections 4 (8), 6 (6) (b) and 272 of the 1999 Constitution, the High Courts of the respective States of federation possess the jurisdiction to entertain chieftaincy matters. Similarly, Customary Courts in Rivers State have unlimited jurisdiction over chieftaincy causes and matters.[4]

It is submitted that the extensive examination undertaken by the learned author of the ouster of jurisdiction of court over chieftaincy matters prior to 1979 is only a matter of academic or historical interest as same lacks any practical value.

Apart from adjudication by the courts, chieftaincy disputes could also be settled through resort to native arbitration. Although the learned author did not indicate clearly whether settlement of chieftaincy disputes through native arbitration is to be preferred to adjudication by courts of law, it is submitted that since the chieftaincy institution is deeply rooted in the traditional political system of the Kalabari people, settlement of chieftaincy disputes should be undertaken primarily through native arbitration.

Given the intricacies of judicial proceedings in our superior courts based largely on the received English Rules of Evidence and Procedures as codified in local legislation, the search for the truth in the judicial process could be hindered by these technical rules. Adjudication by the natives themselves who are familiar with the traditional history of the institution and the rights of the disputing parties could serve the ends of justice better.

Chapter 11 deals with the future of chieftaincy institution in Kalabari. The author noted that 'only a drastic and realistic reappraisal of its role can restore to the chieftaincy institution some of its lost glory". He further argued that for any system of government to be permanent and progressive, it must have its roots in the framework of the indigenous society.

While it is conceded that the chieftaincy institution has a role to play in our modern society in terms of advising government on matters relating to the institution itself, native law and custom and the maintenance of peace and order in our communities, it is safe to postulate that Nigeria may never return to that era when the chieftaincy institution dominated the economic, social and political spheres of the society. The Nigerian State as declared in Section 14(1) of the 1999 Constitution "shall be a State based on the principle of sovereignty and social justice". Accordingly, sovereignty belongs to the people of Nigeria from whom government through the Constitution derives all its powers and authority.

Given that the chieftaincy institution is undemocratic, it is submitted that the institution in its present form, cannot fit into the constitutional structure of the Federation of Nigeria and is better left alone with its advisory jurisdiction. Besides, we fail to see how the chieftaincy institution can cope with the destructive tendencies of Nigerian politics. The institution can only remain relevant as long as it remains apolitical.

I have no doubt whatsoever in my mind that the author has achieved the set objectives and that this work in

[1] See Section 3 (b) & (c) of the Rivers State Customary Courts Law, 2014. See Order 10 Rule 6 (2) & (3) of the Rivers State Customary Courts Rules, 2011.
[2] See Section 161 (3) of the Constitution of the Federation of Nigeria 1963.
[3] Adanji v. Hunvoo 1 NLR 74.
[4] Section 6(1) and the First Schedule in Rivers State Customary Courts Law 2014.

the language of Section 70 of the Evidence Act, 2011 will be accepted and recognized as a legal authority by the Kalabari nation-state as setting out the native law and custom relating to its chieftaincy institution.

However, like every academic work, the book has its flaws. First, this work will not be easily comprehended by persons who are not trained in the science of law. I say this with deepest sense of responsibility and respect because the book is saturated with legal postulations and contentions. Indeed there are far more references to legal materials and sources that there are to other sources. This is understandable having regard to the intimidating legal background of the author. I was actually wondering whether the title of this book should not be changed in subsequent edition to read "*Chieftaincy Law among the Kalabari Ijaw".*

Secondly, the author has adopted empirical and analytical research methodologies. As with most empirical research, particularly one built around oral tradition, the validity of the sources is always a source of concern because oral tradition can be deliberately distorted and embellished to serve personal, family or communal interest. Furthermore, the interpretation and analysis of the sources themselves could draw on the personal prejudice and interest of the author. What this means is that an intellectual response to this work by other authors cannot be ruled out.

Finally, the extant Chieftaincy Law in Rivers State is the Rivers State Traditional Rulers' Law (No. 4) of 2015 which is actually annexed as Appendix 1 in the book. However, for some inexplicable reasons, references were not made to this Law in the discussion of the legislative intervention on chieftaincy institution in Rivers State but rather to the provision of Chieftaincy Law, 1978[1] which has long been repeal.

Having said this, it is my final submission that this book is an invaluable contribution to knowledge on chieftaincy institution among the Kalabari Ijaw and indeed the entire Niger Delta Region. It is strongly recommended to judges, lawyers, law teachers, law students, traditional rulers, anthropologists and general reading public.

[1] Cap 25 Law of Rivers State of Nigeria 1999.