

# The Imperatives to Absolute Primogeniture Rules under the Bini Customary Law of Succession

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## Abstract

Under the Bini Customary Law of succession, a female child is not entitled to the right to inherit the 'Igiogbe' of her father, which is the principal house where the deceased lived and died. The 'Igiogbe' is the exclusive right of the deceased eldest survival son. In respect of his age, he must inherit the principal house of his deceased father, provided he has performed the first and second burial ceremony of his late father. The daughters of the deceased are only entitled to remnants. This rule, though has survived for centuries, it is an affront to the rights of the female daughters who through section 42(1) of the 1999 constitution (as amended) has the right to the same position of the male surviving son of the deceased. The discriminatory primogeniture of the Bini Law of succession is a violation of human rights of several international covenants which Nigeria has ratified and domesticated, among which are Convention on the Elimination of all forms of Discrimination Against Women (CEDAW) European charter for equality of women and men in local life, Convention on the political rights of women, African protocol on women's rights etc. Discrimination of female child in her father 'Igiogbe' for the simple reason of being born a female instead of a male is repugnant on social justice and equity. Being born in either gender should not in any way hamper the right of inheriting the principal house of the deceased. Male and female genders should have equal rights to the throne in any Bini Customary rights of inheritance and with no discrimination of any kind. Example of the British monarchical system where sex is irrelevant should be copied where both genders has equal right in succession to the throne. This is the beauty of globalization and transformation of traditional institutions in modern customary system. What is good for the goose is also good for the ganders. The 'Igiogbe' must not be sacrosanctly reserved for only the male eldest son rather it should be on the basis of absolute primogeniture, which allows for eldest survival child of whatever sex. Even if being a female she should have the unrestricted rights to her father's 'Igiogbe'.

**Keywords:** Succession, Primogeniture, CEDAW, Igiogbe

## 1 Introduction

The Binis are one of the ethnic minor tribes in Nigeria, they are concentrated in several local governments of Edo State with a paramount king, (the Oba), residing at the state capital, Benin City. Benin Kingdom formerly known as Igodomigodo', (the city of Blood) is one of the oldest, developed along the coastal hinterland of the Nigeria Niger Delta region. The Oba is the custodian of the people's tradition and custom. The present Oba, Oba Ewuare II is the 40<sup>th</sup> monarch that has ruled the Kingdom from the inception of the Obaship. The Kingdom is the remainants of the old Ogiso dynasty, in which two of the Ogisos were women. However, it is noted that in 1440 AD Oba Ewuare I (the great) also known as Ogidigan, introduced a lot of innovations to the Kingdom, he reduced the powers of the Uzama Chiefs to appointing the Oba into the throne, he adopted the primogeniture lineage system<sup>1</sup> which posits that upon the death of the Oba the eldest surviving son shall take over the Kingdom of his father with a condition that he had observed the necessary funeral obsequies. Then the first surviving son would automatically step into the position of his late father. Primogeniture rules ensures that property remain intact and in a familial line. Some of the earliest references to primogeniture are traceable to the ancient Greek, Romans and Egyptians, the practice was introduced to England following the introduction of Feudalism by the Normans in the 11<sup>th</sup> century. It is the right of every first born to inheritance of a deceased parents and also a right to the throne of a deceased father.

## 2 Origin of Primogeniture in Benin Kingdom

According to the Benin tradition, the Oba dictates the pattern of succession and inheritance, in the entire Kingdom. The words of the Oba is regarded as law to this day especially on the tradition of the Kingdom. He is the traditional ruler of the people. The Oba of Benin is revered and respected among the people, and his is regarded as the mouth piece of the gods or deities of the people. He is sometimes referred to as the son of 'the sky', and that, he owns the entire universe, and that he has the power to pronounced a blessing or a curse on anyone. Before the emergence of Oba Ewuare I, the Benin law of primogeniture was often challenged, there were occasions between 1000 AD to 1050, the primogeniture system was rejected and the Odionwere rotational system of administration was revived, however, the ruling Odionwere were often performing below expectation before it was reversed to status quo.

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<sup>1</sup> Kevin Shillington, Encyclopedia of African History ed (2005) Vol. 1 ed New York: Taylor & Francis. accessed 10/9/23.

The other two period that defiled the primogeniture rule were remarkable between 1200-1235 and 1334-1370.<sup>2</sup> They were the reign of Oba Eweka I and Oba Ohen respectively, but in the reign of Ewuakpe 1700-1712 the rule of primogeniture by which the eldest surviving son inherits the throne was further enhanced. He dethrone the position of Chief 'Iken' of Uselu and introduced his son to the palace of Iken who never returned from the battle field of Owo.

Uselu, a few kilometres from Benin became a training ground and the palace for the 'would-be' Oba, usually the first son of the Oba, who is also called the crown prince. Iken palace became the palace of the Crown Prince of the Benin Kingdom till this day. Iken could have become the King of Benin but for the decree by the Oba, that it is only the Crown Prince that would be prince of Uselu. The Crown Prince of the Benin Kingdom usually leave the palace to become the Oba of Benin<sup>3</sup> and whoever becomes the Edaiken of Uselu (Prince of Uselu also known as the Crown Prince) is entitled to the Kingship of the Kingdom of Benin as the Obawhen the King demises.

In all, no Bini Princess was ever considered to the position of the Crown Prince. No matrilineal primogeniture otherwise known as the eldest survival daughter has ever inherited the bini throne, so, every bini indigene copied from the Oba. The Oba is the role model of every indigenous bini family. Prior to the ascension of Oba Akenzua in 1933, the British had wanted to install Oba Akenzua's elder sister to become the Oba of Benin, but the move was vehemently condemn and resisted by the Benin Chiefs who reminded the colonial masters' of the rule of male primogeniture in the Kingdom, prior to this time, in 1897 when Oba Ovonramwen was captured and deported to Calabar, the British had wanted to Crown the then appointed administrator, Chief Obaseki to be the Oba of Benin, but the rule of primogeniture prevailed, and until the death of Oba Ovonramwen in Calabar in 1914, Obaseki remain a de facto administrator of the Benin people and did not ruled as "Oba of Benin". It was the son of Oba Ovonramwen, Oba Eweka II that was entitled to the throne and he eventually became the Oba at the death of his father.

The Benin Kingdom has been keen in keeping with male primogeniture rules up to the present day. It should be of note that the primogeniture rules is not particular with the Binis alone. It was brought along with the bini from Egypt and a part of Israel where primogeniture rules dominates major Kingdoms, the middle east were renowned for this system, biblically, characters such as Jacob, Abraham, etc practiced this style of succession. Historically account had it that, the Binis migrated from the middle East, some oral account had it that, the Binis were the lost Israelites who decided to settle down the riverine region of West Africa, owing to the afflictions suffered by King Pharaoh which prompted their exodus to the present day location.

### 3 Primogeniture and Inheritance in Benin Kingdom

Under the Bini native law and custom it is the eldest surviving son who had performs his late father's first and final burial rites that has the rights to his fathers' principal estate, (the house which the deceased lived and died), known as 'Igiogbe'. The Supreme Court set a decision in the case of *Arase v. Arase*<sup>4</sup> it was held that the male surviving son of the decease under the rule of primogeniture has an exclusive rights over his late father's estates. In *Agidigbi v. Agidigbi*<sup>5</sup> it was held inta alia:

Under the Bini native law and custom, the eldest son of a deceased person or testator is entitled to inherit without question the house or houses known as 'Igiogbe' in which the decease/testator lived and died. Thus, a testator cannot validly dispose of the Igiogbe by his will except to his eldest surviving male child. And any devise of the 'Igiogbe' to any other person is void.

In the case of *Idehen v. Idehen*<sup>6</sup> the eldest son must inherit the principal effects of the deceased: what is left is distributed to other children.

Traditionally the 'Igiogbe' of a Bini man is believed to house a shrine through which the living senior son of the deceased communicates with his late father and other deities, through the use of 'Ukhure' which is a wooden staff. The eldest son can always gain access to his late fathers' spirit for inquiry or help whenever the need arises and the senior son must always solicit for his younger ones and other sisters who could either be his senior or junior by age. And with the 'Ukhure' he can also invoke his late father's spirit to punish any of his siblings who disrespected him.

According to Asemwonta<sup>7</sup>

Under the Bini native law and custom, the system of primogeniture (i.e from father to eldest son) is rapidly adhered to in deciding who succeeds his father, both to the inheritable properties and ascension to the throne. If a man has no male child,

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<sup>2</sup> Jacob Eghareoba (A short History of Benin, 1936, reprint Ann Arbor: Michigan State University Press 1991.

<sup>3</sup>Igbafe Philip; Benin under British: The impact of colonial on an African Kingdom 1897-1938 (London Longman) 1979 p.2.

<sup>4</sup>(1981) NSCC 101, 114.

<sup>5</sup>(1996) 6 NWLR 302-303.

<sup>6</sup>(1991) 6 NWLR 387.

<sup>7</sup>Usi Asemwonta: The Customary Law of the Binis (Benin Commercial Press, 2000) 36.

distribution of properties is made among the female children according to their ages. If there are no children, the male grand child steps into the shoes of the first male son of the deceased as if he is the first son of the deceased. He has to perform all the rites as the son would have done.<sup>8</sup>

Under the Bini customary law of inheritance, daughters have the right to inherit their father's landed property apart from the 'Igiogbe' whenever the property is distributed<sup>9</sup>. In the share of property, sons are given preference over daughters, daughter are not wholly prevented from their father's property, but the remainants are always reserved for them and sometimes, no property would be given to them (depending on the volume of property available), and before any bini daughter is entitle to any property of his deceased father, she must have perform her fathers' burial rite also.<sup>10</sup> It is customary that a daughter who is the eldest child of the deceased person does not have the right to inherit the 'Igiogbe' under the Bini Law of inheritance. The eldest son of the deceased upon inheriting his father's principal estates and sometimes his father's young wives he has the responsibility to cater for the women who are now his wives and his siblings and other children of his late father, if he does not want to marry any of his late father's younger wives, he could devise a means for their livelihood.

The eldest son inherits both assets and liabilities from his late father. On the condition that he fails to provide or care for his late father's younger ones who are entitled to stay at the 'Igiogbe' until they are strong enough to be independent, there will be acrimony among them, which would attract the elders of the family to intervene and thereby ordering the re-distribution of the property or properties among the children and if the eldest son refuses, the elders' through the family gods 'Edionegbe' would place a curse on the eldest son.

The Benin traditional system also adopted a system called the 'Urho' which mean per stripe or per 'branch'. This is usually done in polygamous setting where the property is distributed per the number of wives. Every 'branch' will have their own share of the deceased father's property and every senior male child of the 'branches' will have their property, but the 'Igiogbe' is left untouched (it belongs to the overall eldest son). At this junction, it is obvious that the pattern of the Benin style of inheritance is discriminatory against the female children, simply for no fault of theirs. This system appear to be unfair and inequitable to the female children, and in some polygamous setting, wives with no male children sometimes loose out of the decease father's property. For the simple reasons of being a female, to be prevented of the rightful place, as a senior, where necessary, is an aberration to the provision of the 1999 Constitution in Nigeria.

A male child is highly regarded in the Bini custom and tradition, a woman could go at any length to secure a male child for a man in the Bini culture for the reasons of inheritance, also a man could go all out for a male child even outside wedlock believing that without a male heir, he has only wasted his entire time on earth, labouring for his in- laws, (men to whom his daughters would be married to) meaning that no one is left on earth after his demise to communicate with his spirit, when he is gone to the great beyond, and when no one communicates with his spirits, there could be no chance for his reincarnation, he was going to rot and lost in hell. This is a 'No' for a Bini man. He would not allow himself for this eternal punishment; therefore he must seek for a male heir at any cost.

## 4 The Practices of Primogeniture in other Jurisdiction

### 4.1 The Igala/Idoma Custom on Inheritance

Under the Igala culture, it is only the male children that can inherit their deceased father's estates; the females are out rightly excluded from this rights<sup>11</sup> and where there is no son, close male relatives will succeed to the deceased man estates. In the events that the son of the deceased inherits the property, the female daughters who are now disfavoured are at the mercy of their brother who could magnanimously provide for them.<sup>12</sup> However, the female daughters can share in the economic trees planted on the family land, but has no right or share over the family land or other properties.

In *Ihama v. Akogu*<sup>13</sup> the court held:

A daughter under Igala customary law will not own land in the family but the male could, because the female will be married to another family. It would mean that her children will own their fathers' land and the land of their mother's father as well.

Just for the above reasons, women are discriminated from their fathers' property.

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<sup>8</sup>Ibid.

<sup>9</sup>Finine Fekumo Customary Land Law in Nigeria (Port Harcourt F & F Publishers, 2002) 373.

<sup>10</sup>Supra Note 8.

<sup>11</sup>Richard Mordi, An appraisal of the inheritance rights of women in Nigeria <http://www.academic.edu> 718784/an appraisal.accessed 1/9/23.

<sup>12</sup>Ibid.

<sup>13</sup>Unreported case in suit No MD/26A/78, Okpo Area Court II.

#### 4.2 Hausa Custom on Inheritance

The Hausa and Fulani are dominant in Northern Nigeria, Islamic law under the Sharia system is domicile in most customary activities in the region, the indigenous Hausa native law is somewhat replicated by the Islamic laws; prior to Islam, young boys and females were not eligible to inherit from their deceased father's property, this was simply because, young sons and girls cannot go to war and collect booty or treasure (Gamima) they should not be part of beneficiary to inheritance *Mohammadu v. Mohammed*.<sup>14</sup>

Today, in Hausa customary law, it is only the male members of the family that has the right of inheritance and where there are no sons, the brother of the deceased is entitled to succession in the family, but in Islam law, the number of wives of the deceased will determine how properties are shared. It will be shared 8 times, and 1 out of the 8 will be shared among the wives in respect of their numbers. The remaining estates will be mixed together and shared among the children. While the girls will inherit half of what the boys inherit, (properties which are movables).

In Hausa land we follow Islamic methods of inheritance, which in Islam is done by God. God himself makes the division we follow whatever the Koran says sometimes we do the division by ourselves. If it is complex for instance where a man has up to 4 wives and they are not united, when he dies and there are some misunderstanding in sharing the property, we involve the Sharia Court.<sup>15</sup>

Land can only be inherited by males within the family in customary law system but the Sharia, gave the rights to both men and women to inherit the estates of their deceased parents; Sharia affords women, whether daughter or wives the right to inheritance. This provision makes the Sharia laws, of more value in the realm of inheritance, with emphasis on equality and human rights<sup>16</sup> to the rejection of the core Hausa customary law of succession.

#### 4.3 Itsekiri Custom of Inheritance

The Itsekiri lived within the delta region of Delta State of Nigeria; they are related to the Yorubas and the Binis. In *Thompson Oke and others v. Robinson Oke and others*<sup>17</sup> it was held that the Itsekiri and the Urhobo have similar customary system of inheritance, in the Itsekiri system the eldest son chooses first with the exclusion of the eldest daughter; it is a male primogeniture system, the first son inherits the house where the father lived, and other person effects are shared among other children both sex (male and female) can inherit including those born outside wedlock. The property of the deceased is shared by the following method:

- a) Sharing equally without any distinction
- b) Male children get larger shares against the female children yet within the same sex, they share equally.
- c) Sharing the estate in the order of seniority whereby older ones get larger shares, that is in descending order.

The above options are open to the children, usually supervised by the family head.

#### 4.4 Absolute Primogeniture and the Customary Right to Inheritance

Absolute primogeniture is a system known as equal or lineal primogeniture which allows succession to be passed to the eldest surviving child regardless of gender. In this system, sex is irrelevant to inheritance. The following countries are known to have adopted this kind of primogeniture, Sweden since 1980, the Netherlands since 1983, Norway since 1990, Denmark since 2009, and United Kingdom 2013.

In this method, females are given the same rights to the deceased property, estates or throne like their male counterparts. The above countries no longer regard cognatic primogeniture as fashionable, they believed that the change is needed to get more female hereditary peers into the House of Lords, for fairness and equality of opportunity; sex must be irrelevant, rather it should be the contribution and views that counts.<sup>18</sup>

Absolute primogeniture is a right that recognized the dignity of the human person as a right founded on the rights of women as a human being, a right defined as inalienable<sup>19</sup> rights to which a person is inherently entitled simply because

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<sup>14</sup>Ibid

<sup>15</sup> Interviewed with Mr. Hussein Ali Institute of Advance Legal Studies (NAILS) Librarian <http://motun911.wordpress.com>. accessed 1/9/23.

<sup>16</sup>Supra note II

<sup>17</sup> 1974 1 ALL NLR (pt. 1) 443.

<sup>18</sup>Martin Docherty-Hughes, Addressing, Parliament in the U.K. on Hereditary titles (female succession) Vol. 655. Debates 5/3/19. accessed 8/9/23.

<sup>19</sup>The United Nations, office of the High Commissioner of Human Rights, 19/8/2014.

he or she is a human being.<sup>20</sup> Human rights are indivisible and interdependent which are inherent in all human being regardless of sex, and this right is necessary for the survival of individuals to the realization of his or her potentials to the full, therefore, a deprivation of this right from any human beings be a male or female is a distortion of humanhood and tantamount to the destruction of humanity. Human being, (male or female) possesses the rights that are founded on the notion of individual respect, with the assumption that each human is a moral and rational entity who deserves to be treated with dignity. Human rights are in the sense of civil, political economic social and cultural<sup>21</sup>, which are essential to meaningful existence.

In the case of *Ransome-Kuti v. AG Federation*<sup>22</sup>, Oputa JSC highlighted that human beings must enjoy the rights he or she is endowed, which he described as privileges of equal benefits.

“... derived from the premises of man’s inalienable right to life liberty and pursuit of happiness and are enshrined and clearly spelt out in the constitution of the federal Republic of Nigeria”.

Britain is a good example in the practice of absolute primogeniture and it is in tandem with human right and equitable flavour.

## 5 Legal Frame work on Gender Equality and Absolute Primogeniture

There have been provisions for gender right protection for the past decades globally owing to the fact that gender disparity has been a problem in succession related issues to which the international and local legislation has now ruled on. The United Nations Declaration of Human right<sup>23</sup> provides for equality of men and women and also prohibits discrimination on ground of sex.

The European convention, through regional human rights instruments provides also for freedom from discrimination on any grounds.<sup>24</sup> The African Charter on Human and People’s Rights also recognized the right of women to the exclusion of all forms of discrimination based on sex.<sup>25</sup> The Convention on the Elimination of all forms of Discrimination Against Women (CEDAW) prohibits any forms of discrimination either in Personal life, Social, Political, Civil or Cultural system by which a woman finds herself, it also stipulates that a woman must have the rights to obtain family benefits.<sup>26</sup>

A woman also should have equal rights with men in a matter of law and business contracts<sup>27</sup> and in other magnification, including the right to absolute primogeniture in any customary setting. Other instruments protecting women rights includes the following:

- (a) European charter of equality of women and men in local life.
- (b) Convention in the political rights of women.
- (c) Declaration on the Elimination of violence against women (DEVAW) 1993.
- (d) African protocol on women’s rights.
- (e) Beijing Declaration and platform for Action 1995.
- (f) International Labour Organisation (ILO).
- (g) United Nations International Children’s Emergency Fund etc (Unicef).

In Nigeria, section 42(1) is very explicit on the right of equality in respective of any circumstances surrounding the birth of individuals.

## 6 Discussions

It is interesting that Nigeria is a signatory to most of the instruments protecting gender’s equality as enumerated above, regrettably the rule of primogeniture in most customary system in the country has been in favour of the male primogeniture which tends to place the female counterparts in an absolute disadvantaged position, just because of the circumstances surrounding their birth: they are born as female, and are also regarded inferior human beings, this ought not to be in primogeniture. The Convention for the Elimination of all forms Discrimination Against Women (CEDAW) specifically point to the elimination of all forms of discriminations against women as a right that all human system must obey, inclusive

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<sup>20</sup>Sepulveda Magdalene: Human rights reference Handbook (University for peace) 3<sup>rd</sup> edition (2004) p.3.

<sup>21</sup>See International Covenant of Economic, Social and Cultural Rights (ICESCR) 1966.

<sup>22</sup>(1985) 2 NWLR pt. 6; p. 211.

<sup>23</sup>UNDHR Article I, II 1948.

<sup>24</sup>European Convention, Article 14, protocol 12.

<sup>25</sup>See Generally, Article 1(f) African Charter on Human and People’s Right.

<sup>26</sup>CEDAW Article 13.

<sup>27</sup>CEDAW Article 16.

of the right of women to absolute primogeniture in all modern customary system of succession in Nigeria including the Bini customary system.

The human rights to be enjoyed by women should include the right to absolute primogeniture, given the fact that, women contributes largely to social and economic stability of the society, and a carefully look revealed that nothing differentiates the male and female human beings, rather than their reproductive system which helps in complimentary to one another. In terms of procreation, and warmth they need each other, also in social and political life, they co-exist, and contributes to the human wellbeing, for national goals, and future regenerations. The popular saying that:

‘What a man can do, a woman could even do better’, is not to be joke with it is an incontrovertible fact, therefore there should be no discrimination against human diversity. In human relations and posterity women have been seen to lead several revolutions where men dared not. Queen Idia, the mother of Oba Esigie of Benin Kingdom in the fifteenth century was an army captain who conquered many towns and expanded the Benin Kingdom as far as to the present day Idah in Kogi State. And in the present day Nigeria, women like Olufunmilayo Ransome-Kuti, Ngozi Okonjo-Iweala, Margaret Ekpo, Chimamanda Ngozi Adichie Elizabeth Abimbola Awoliyi, Adetowun Ogunsheye, Grace Alele Williams<sup>28</sup> etc were all known to have done exploit in their different field of endeavours.

The first, woman warrior in modern Nigeria was also a woman, a skillful Hausa woman Amina, the Queen of Zazzau, she commanded a vast battalion of soldiers in the expanding her Kingdom, she was fearless, in her spirit, she was a lioness. she symbolizes the spirit and strength of womanhood. She reigned for 34 years, and she greatly impacted her Kingdom as a Queen and left an exemplary foot marks, and today, many institutions in Nigeria are named after her, among them are Queen Amina College, and Queen Amina hall in Ahmadu Bello University, Zaria<sup>29</sup> etc.

In modern world, the notion that men are bread winners, while women are to continue to play the secondary part of social affairs are over, most homes relied rapidly on the strength of women to navigate the ocean of economic and social crush that the country currently domicile, if women are given the chance of absolute primogeniture in modern traditional institutions in Nigeria, there would be rapid transformation and innovations in the male dominated world.

It is not sufficient to rely solely on cultural practices of conservative social system that posits on male primogeniture system to advance socioeconomic socialization of a particular ethnic groups, against the female counterparts rather in shift to absolute primogeniture would provide social balances and equity to the moribund culture of the people of Nigeria especially the Binis and their Kingdoms. There is nothing that suggest that men possesses a superior intellects or creativity to the women counterparts in social, economic and political premises, neither is there any clause in the various legislation relegating the female folks to the second fiddle. The exuberance that women are for their husband family whenever there are married off, is a clear demonstration of ignorance and weird thought anchored on compulsive selfishness by their male counterparts.

## 7 Conclusion

Women marginalization in primogeniture in the bini customary law of succession is a reflection of the world’s current gender inequality which has had an absolutely negativism on women’s lives, this devastation has contributed to the persistence women’s inferior standing in the society. This is a breach to the provision of the United Nations General Assembly and the Universal Declaration of Human Rights of 1948. The declaration categorically laid emphasis on race, colour, sex language and other status on the basis of discrimination. It was positioned that all (human beings) which also applies to women either in the traditional or political setting should not be prejudiced.

The rightful place of absolute primogeniture should be given to women. It is prejudicial of the Benin Kingdom that it is only the survival eldest male child of the deceased that steps into the ‘Igiogbe’ to claim ownership, instead of the most eldest child: in respective of sex. The ‘Igiogbe’ should be made to be inherited by any first born of the deceased (whether a male or a female) provided they are legitimate children of the deceased father.

The absolute primogeniture system globally is in demonstration in many advanced democracies and it is efficacious in usage. Absolute primogeniture would curb unhealthy rivalries and competitions in the human race. The male preference primogeniture is oppressive and also runs against section 42(1) of the 1999 Constitution of the Federal Republic of Nigeria, as well as other international legislations on Human rights all of which forbids gender discrimination.

All sons and daughters are to be treated equally as God is the creator of both sex. The Benin traditional system must adopt absolute primogeniture so as to meet up with the current global system which called for collaborative efforts in achieving goals. The rights of women equality with men must be respected at all levels including the traditional systems in Benin Kingdom.

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<sup>28</sup><http://www.google.com/m>q=female and legends+> accessed 9/9/23.

<sup>29</sup>[http://www.dw.com/en/amina\\_the\\_warrior](http://www.dw.com/en/amina_the_warrior) also see Amina <https://g.co/kgs/Z4nF4g> accessed 8/9/23.

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