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THE LEGAL AND SOCIO-CULTURAL STATUS OF SURVIVING FEMALES IN INTESTATE SUCCESSION MATTERS UNDER BENIN CUSTOMARY LAW

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The concept of succession involves the transmission of the rights and obligations of a deceased person in respect of his estate to his heirs and successors. It deals primarily with the distribution of a deceased person's intestate estate, to his heirs and successors. It further accommodates the rules, governing the administration of a deceased person's intestate estate by personal representatives of the deceased person including state participation in respect of real estate situate within the concerned state's jurisdiction as well as the personal estate of the deceased person subject to its jurisdiction. Intestacy occurs where a person dies without making a legally valid will in respect of his estate. Nigeria operates a pluralist system of law in relation to intestacy, this include the application of received English Law (common Law, statutes of general application, doctrines of equity), as well as legislations by the National Assembly and State Houses of Assembly and other bye-laws made by local government councils. Similarly there are in existence multifarious customary laws as there are distinctive areas of grouping of peoples. These customary laws are in some instances, generally unwritten. The Constitution of the Federal Republic of Nigeria 1999 (as amended) recognizes and preserves these sources of laws in Nigeria and projects a policy of keeping them 'separate and separable.' The law of intestate succession is impacted by a variety of rules from the two broad systems of laws. The customary laws of succession govern persons who were subject to the native law and custom of their community before their death. It is against this background the paper critically examines the operation of legal and socio-cultural status of females in intestate succession under Benin customary law. The authors argued that the rules in respect of the customary law of inheritance of the Benin people are predominantly skewed against the female gender, such as surviving widows and daughters, unlike under testate succession matters provided for under the applicable statute. The paper finally maintained that baring the discrimination against females, the essence of societal justice to genders will greatly be promoted ensuring the greatest happiness to surviving females of a deceased.

Keywords: Succession, Intestacy, Estate, Customary Law, Inheritance

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1. Introduction

A good number of states in Nigeria have legislations,¹ regulating qualifications for and scheme for distribution of and benefitting from a deceased property-owner's intestate estate.² Specifically, there are Wills Laws of states created out of the former Western Region, Administration of Estate Laws in the same states and similar laws in other states, the Administration and Succession (Estate of Deceased Persons) Laws of Anambra State and others rely on English statutes. In many other situations (and where written laws fail), principles of customary law apply.³

Basically succession under customary law is usually limited to intestate succession.⁴ Succession under customary law is only applicable to a person who is subject to customary law and who dies without living a valid Will. In Nigeria, there is no uniformity of rules of succession under customary law as there are different laws and customs guiding intestate estate across Nigeria. In some parts of the country, succession is based on the concept of family property. While in some parts, the concept of male succession takes precedence.

Essentially, the customary law of the deceased is the appropriate law to be applied if he died intestate. The principles of customary law will become applicable irrespective of whether the deceased died outside a location beyond the jurisdiction of ethnic group or he leaves properties outside his hometown. It is also important to observe that while it is true that with respect to land matters generally, the customary law of the place where the land is situate is the applicable law. However, with respect to inheritance, the appropriate customary law is the personal customary law.⁵ Prior to the decision of the Supreme Court in *Adeniyi Oluwu and Ors v Olabowale Oluwu and 66 Ors.*,⁶ it was a generally accepted principle of law in Nigeria that a person carries his customary law with him. Therefore it was not legally possible for a Nigerian to change and forget

¹ It should be noted that Nigeria is a multi-cultural society. The fact of her multicultural demography is captured in the process of transmutation of customary rules to effective laws. Therefore, there are two legal systems reflecting the effective laws and customary rules-cum laws in different states of the federation. See generally, Anya Kingsley Anya, 'Customary Rules and Evolution of Effective Laws,' Nigerian Law: Contemporary Issues, (ed.) Prof. M O Ogunbe) (2003) Chapter 4, Pp. 51, 58 <<https://www.afrithings.net/vendor/anya/>>

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³ Ibid

⁴ Anya, Supra, at P. 77

⁵ *Tapa v Kuka (1945) 18 NLR 5,*

⁶ *Adeniyi Oluwu & Ors v Olabawala Oluwu & Ors (1985) 3 NWLR (Pt. 13) 372*

his ethnic group and acquires another ethnic identity, irrespective of the number of years he must have lived and spent in that 'foreign' ethnic group.

The customary laws of succession govern persons who were subject to the native law and custom of their community before their death. Where the person was a Muslim, Islamic law applies. These include those that marry under customary law and not under the Marriage Act, 1914. In other situations where there are no local enactments on intestate estate succession, especially in the Northern and Eastern states of Nigeria, for instance, where a deceased had married under the Marriage Act 1914, the common law rules on intestacy including any applicable statutes of general application (such as the Statute of Distribution and the Intestates Act 1890) will apply. A broad summary of the categorization of these laws include the following:⁷

- A. If a person contracts a monogamous marriage outside Nigeria, the common law of England governs the distribution of his estate.
- B. If he contracts a statutory marriage in Nigeria, then if he dies domiciled in Lagos or any of the states created out of the former Western or Mid-Western Regions, then the Administration of Estates Law will govern.
- C. If he contracted a statutory marriage but dies domiciled in the states created out of the former Eastern or Northern Regions which are yet to enact their own law on non-customary succession, then the common law will also govern the distribution of his estate.
- D. If the intestate was an indigenous Nigerian and did not contract a statutory marriage (or where he did and no spouse or issue survived him), his estate will be distributed in accordance with the relevant customary law or Islamic law as the case may be.
- E. With regards to non-customary succession to real property, the *lex situs* applies; otherwise, if he was subject to customary law or Islamic law, the personal law of the intestate applies regardless of the *lex situs*. Marriage falls under the jurisdiction of the Marriage Act, which includes property rights of spouses, even though it varies from state to state. However, intestate succession is governed in the majority of Nigeria by The Wills Act 1837, and the Amended Wills Act 1867. Therefore, if an individual makes a will, he is not bound to provide for his family.⁸ A notable exception to this testate regime is the states that make up

⁷ Itse Sagay, *Nigerian Law of Succession: Principles, Cases and Commentaries*, (Malthouse Press Limited 2012), 13

⁸ *Ibid*

the former region of Western Nigeria are now governed by the Wills Law Cap. 133, 1959 Laws of Western Nigeria.⁹

F.

F. Under customary systems, making of wills may also be recognized. For example, the Ibos may make a death bed disposition, or Ili--Ekpe, which is an oral Will. Written wills may also be made under customary law. Intestate succession is most frequent form of succession in Nigeria, which raises a much more complex set of rules under the English system.

2. Historical and philosophical basis on succession and inheritance in customary Law

There are many reasons why ancestors bequeath their properties to their descendants whom they predecease. Biblical injunction suggests that God has mandated a good man to leave his wealth (properties) to his children/off-springs after his demise.¹⁰ This divine injunction forms part of the natural law which obliges a man to bequeath his properties to his children. It is pertinent to point out that the divine and natural law obligations which mandate a man to leave his wealth to his children and grandchildren does not gender discriminate against the children (whether male or female) who should succeed to or inherit the deceased parents' property.¹¹

Patterns of inheritance in Nigeria are generally divided into patrilineal and matrilineal. In patrilineal communities, inheritance is through fathers and all those descended from a common ancestor form a patrilineal line. The heirs are the paternal next of kin who include children, uncles, brothers and sisters from the father's line. Inheritance is through mothers in matrilineal communities. In this case, a child belongs to the family of the mother, rather than his father's family.

3. Nature and Scope of Nigerian Law of Succession

There are two types of laws governing succession in Nigeria, and they include testate succession and intestate succession. However, the later intestate succession further manifests in non-customary succession as well as succession under customary law.

I. Testate Succession

As the name implies, testate succession consists primarily of wills. In Nigeria, there is no uniformity of applicable laws relating to wills. Consequently, among the states that were created

⁹ Ibid

¹⁰ Ibid, P. 52

¹¹ Ibid

out of the former western region,¹² the applicable law is the Wills law.¹³ By virtue of the provision of the Applicable Laws Edict of 1972,¹⁴ Lagos State adopted the Western Nigeria law. On the other hand, the rest of the country,¹⁵ consisting of the states from the Northern and the Eastern part, still applies the English Wills Act 1837 and the Wills Amendment Act 1852.¹⁶

An examination of the provision of the Wills law shows that the legislation basically re-enacted the provisions of the Wills Act 1837¹⁷ and the Wills Amendment Act 1852 together with the provisions of the Wills (Soldiers and Sailors) Act 1918, but with inclusion of some provisions that took into consideration the prevalent customary laws principles that regulate succession under customary law in the affected states. For example, Section 3 (1) of the Wills Law provides that real and personal estate, which cannot be affected by testamentary disposition under customary law, cannot be disposed of by will.¹⁸ Section 15 of the Wills Law provides that any will made by a man/woman shall be revoked by his/her subsequent marriage. However, the Wills Law can exempt a marriage in accordance with customary law from having this effect.

II. Intestate Succession

Intestate succession involves the application of three systems of laws, such as the position with legitimacy and legitimation. These are (a) the common law (b) the Administration of Estate Laws of the various States and Customary Law. The crucial question is the determination of the applicable laws to be applied in case of intestate succession in non-customary matters? According to Prof. Itse Sagay, 'the factor, which determines which system is to apply in every case, is the type of marriage contracted by the intestate person. In the case of Muslims the religion practiced by the deceased is also relevant.'¹⁹ He further observed that:

...if a person contracts a Christian (monogamous) marriage outside Nigeria, the common law of England govern the distribution of his estate. If he contracts a statutory (Act) marriage in Nigeria, then if he dies domiciled in Lagos or any of the states comprising the old Western Region, then the Administration of Estate Law (sic.) Laws of Western Nigeria Cap. 1, 1959 will govern. If he contracts a statutory marriage, but dies domiciled in any of the states comprising the former Northern or

¹² Oyo, Ondo, Ogun, Osun, Ekiti, Edo and Delta States

¹³ Cap. 133, Laws of Western Nigeria 1959

¹⁴ No 11 of 1972

¹⁵ With the exceptions of some few states that have enacted their own Wills Laws in line with the Laws of Western Nigeria, 1959

¹⁶ This Statute qualifies as Statute of general application in Nigeria.

¹⁷ *Idehen v Idehen* (1991) 6 NWLR (Pt. 198) P. 382, and *Lawal-Osula v Lawal-Osula* (1995) 9 NWLR (Pt.419) P. 259 where the Supreme Court, discussed extensively the legal implication of the provisions of section 3 (1) of the Wills Law of Bendel State applicable to Edo State.

¹⁸ Customary Law in this context includes Muslim Law. See also *Zaidan v Zaidan* (1974) 4 UILR 283

¹⁹ Itse Sagay, *Nigerian Law of Succession : Principles, Cases and Commentaries*, (Malthouse Press Limited 2012) 73

Eastern Regions, which are yet to enact their own law on non-customary succession, then the common law will also govern the distribution of his estate.²⁰

Finally if the intestate deceased was an indigenous Nigerian and he did not contract a Christian or marriage under the Act, or even if he did and no issue or spouse of such a marriage survived him, his estate will be distributed in according with the relevant customary law. And if the person was a Muslim, then Islamic law would govern the person.²¹ However, in cases involving the distribution of the immovable properties of intestate deceased persons, the applicable law to govern will be the *lex-situs*, this means the law of the place where the land is situated. Therefore, the above generalization is only correct with respect to movable. Similarly, where a person who is subject to customary law or Islamic law dies without a will, it is his personal law that will apply to the distribution of his immovable property and not the *lex situs*.

According to E.I Nwogugu, under the ordinance, an illegitimate child can only share in the intestate estate of the deceased mother if there is no legitimate child.²² The implication of this statement is that if the mother has a legitimate child, she can by Will operate to legitimise the status of such an issue and displace the illegitimacy of the child. The thinking has been captured by section 42 (2) of the 1999 Constitution. This statement is not true in all cases because when spouses contracted customary marriage before the statutory marriage, the child will be legitimated as a result of the subsisting customary law marriage between his parents. This is one of the effects of “double-decker” marriages in Nigeria.

4. Rights of Female to Inherit under the associated Customary Laws in Nigeria

Conservatively, Nigeria has about 500 ethnic nationalities each with its distinctive native law and custom or personal law regulating inheritance and succession to property. However, some of these customary rules are still repugnant to natural justice, equity and good conscience even in the 21st century.²³ The literacy level is still low and majority of the citizens of Nigeria live in rural areas with high levels of poverty, lingual franca impairment and limited abilities to read and comprehend as well as wallowing in many other forms of socio-economic inequalities, that hinder the judicial proceedings through litigations apparently due to discriminatory practices in property distribution of demised persons and or ancestors.

²⁰. *Administrator General v Egbuna and Ors.* 18 NLR 1

²¹ Itse Sagay, *supra* at P. 73

²². Family Law in Nigeria (Revised Heinemann Educational Book 2006) at 305

²³. *Ibid*

Significantly, the diverse customary practices of the multicultural and heterogeneous societies in Nigeria,²⁴ in respect of inheritance and succession matters operates to affect a uniform rule save and except a controversial and complex practices which varies from place to place and has necessitated the adoption of a principle that the applicable customary law in a given case should be the one to which the intestate was subject at the time of his death.²⁵

Consequent on the above, there is need to examine the customary rules of Benin people in respect of inheritance and succession matters by surviving females of the intestate deceased person.

4.1 The Benin Customary law of Inheritance and succession

The Benin people constitute one of the minority ethnic groups in Nigeria. They are concentrated in seven local government councils of Edo State of Nigeria.²⁶ Under Benin native law and custom, the primogeniture rule applies in inheritance matters. This is a practice where the eldest surviving male child of a deceased Benin man inherits the principal house referred to as ‘the Igiogbe.’²⁷ The ‘Igiogbe’ is inherited absolutely by the eldest surviving son, to the exclusion of all other children (even where a female child has been the first child of the deceased), after performing the second burial ceremony of the father.²⁸ The deceased father and the founder of the property (the Igiogbe) cannot disinherit the eldest surviving son of the *igiogbe* by giving it out by will to any other child, notwithstanding the fact that he is at all material times, free to give out any other real property of his, provided it is not the “igiogbe” by will.²⁹ Significantly, the case of *Idehen v Idehen*³⁰ and most recently *Uwaifo v. Uwaifo*³¹ remains the dominant judicial authorities in support of this customary practice.³²

Furthermore, legal commentaries have accordingly favoured this practice of historical origin.

Under Bini Native Law and Custom, the system of primogeniture (i.e. from father to eldest son) is rigidly adhered to in deciding who succeeds his father both to the

²⁴ AK Anya, Judicial Empowerment as Tool in Harmonizing Primordial Claims and Interests in a Multicultural Society, *Journal of Public Law & Constitutional Practice*, vol. 3 No. 2 Sept. 2010, Pp. 40-53. A Publication of Dept. of Public Law University of Jos, Nigeria; republished by <[Researchgate.net/anyakingsleyanya](https://www.researchgate.net/publication/304444444)>

²⁵ Itse Sagay, *Nigerian Law of Succession : Principles, Cases and Commentaries*, (Malthouse Press Limited 2012) 13

²⁶ These local governments are Oredo, Orhionmwon, Ovia South-West, Ovia North-East, Egor, Ikpoba-Okha and Uhumwode.

²⁷ Paul Okhaide Itua, ‘Succession under Benin Customary Law in Nigeria: Igiogbe Matters Arising’ *Journal of Law and Conflict Resolution*, vol. 3 (7) (2011): <<http://www.academicjournals.org/article/article1379863550-Itua.pdf>> accessed 4 July 2023

²⁸ Paul Okhaide Itua, ‘Succession under Benin Customary Law in Nigeria: Igiogbe Matters Arising’ *Journal of Law and Conflict Resolution*/Volume 3(7) (2011): <<http://www.academicjournals.org/article/article1379863550-Itua.pdf>> accessed 4 July 2023

²⁹ Finine Fekumo, *Customary Land Law in Nigeria* (Port Harcourt: F & F Publishers, 2002), 365

³⁰ (1991) 6 NWLR (Pt. 138), 382

³¹ (2013) 10 NWLR (Pt. 361), 185

³² It should be noted that the concerned judicial authorities were decided by the Nigerian Supreme court.

inheritable properties and ascension to the throne. If a man has no male child, 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 1st son of the deceased. He has to perform all the rites as the son would have done.³³

Under the Benin Customary Law of Inheritance, daughters have the right to inherit their father's landed property apart from the Igiogbe when the property is distributed.³⁴ However, sons are given precedence over daughters in the distribution of the property. Benin customary law does not wholly prevent daughters from inheriting particularly where there are no male children.³⁵ The only condition is that the final burial ceremony must be performed for the daughter to inherit.³⁶ Where there is a child, whether male or female, the brothers and other relations of the deceased hardly have any claim to the deceased property.³⁷ This is particularly true where the daughter is the only surviving child.³⁸ Although a daughter who is the eldest child of a deceased person under Benin customary law of inheritance does not have the right to inherit the Igiogbe, the custom allows her to be given a reasonable share of the other property of her father by the mutual agreement of the family elders and the other children.³⁹ The fact that it is the elders and other children who determine whether or not she should be given a reasonable share and what amounts to a reasonable share means that what she gets as the eldest child is not as of right. However, it depends entirely on the whims and caprices of the elders of the family and the other children. Thus, the custom is unjust and discriminatory. Similarly, under Benin customary law, a widow has no right to inherit the property of her deceased husband.⁴⁰ However, it would seem

³³. Usi Osemwowa, 'The Customary Law of the Binis' (Benin: Myke Commercial Press, 2000) at p. 36. In fact AK Anya in his abstract to article entitled, 'Extending the frontiers of Intestate Succession and Inheritance to Adopted Beneficiary: Olaiya v Olaiya,' (2002) Igbinedion University College of Law Journal vol. 1 Pp. 76-96 considered the plausibility and possibility of accommodating persons ordinarily not related by blood, in inheriting as well as succeeding the intestate estate and / or traditional office, in a nonetheless peculiar customary setting against the backdrop of the decision of the apex court in Olaiya v Olaiya in Nigeria... He observed that customary rule of law operates to bar an adopted person to customary / traditional stools, posts and offices premised on the rule of blood descent, i.e. patter-sociological. The author further argued that the decision of the apex court has lent credence to the fact that a person other than a biological child of a deceased is eligible to become a beneficiary. However, the author recognised the fact this may not be tenable at all times against the backdrop of diverse cultural and customary practices, which, at best is notionally sectional in Nigeria. The author maintained that the decision of the supreme court is an ingenious one apparently aimed at curing whatever disability affecting adopted persons in Nigeria as well as in other communities where customary practices are extant. See particularly the abstract to the article published by <Researchgate.net/anyakingsleyanya>

³⁴. Finine Fekumo, supra, at p. 373

³⁵. Ibid

³⁶. Ibid

³⁷. Ibid

³⁸. Ibid

³⁹. Jaiyeola Mulikat Bolaji, 'A Comparative Study of "Women's Rights of Inheritance in Nigeria under Islamic Law and some customary laws,' (unpd. Doctoral Thesis, UNILORIN 2011), 211 <<http://www.unilorin.edu.ng/graduatetheses/law/law-law-2011-JAIYIEOLA.pdf>> accessed 13 July 2023

⁴⁰. Finine Fekumo, supra at p. 373

that the husband could provide for the wife in his will, provided he does not violate the provisions of the Wills Law.⁴¹

Historical accounts of the Benin people show that the rule of primogeniture of the Bini customary law of inheritance was introduced by the first Oba of Benin, Oba Eweka 1 of the Eweka Dynasty,⁴² who ruled about 1200 A.D.⁴³ He established that the eldest male child of the Oba would succeed him on the throne and also inherit his estate to the exclusion of other children provided he had solely performed the funeral rites of his father. However, the eldest son had the obligation to take care of the wives and other children of his father.⁴⁴ To some extent, the Benin customary law of inheritance has been collated and stated in a handbook by the Benin Traditional Council on the authority of the Oba of Benin who is the custodian of the Benin customary law.⁴⁵ The primogeniture rule is stated in the handbook and has been affirmed by the Supreme Court in *Ogiamen v Ogiamen*.⁴⁶

The Benin people have adopted this rule of inheritance as a mark of respect and honour for their Oba.⁴⁷ Hence, when a Benin man dies intestate, his eldest surviving male child inherits his entire property to the exclusion of other children after he has performed the funeral rites of his father in accordance with customary requirements. The eldest son who inherits the property to the exclusion of other children is under an obligation to take care of his deceased father's other children.⁴⁸ The failure of the eldest son over the years, to take care of other children after inheriting the property of their deceased fathers to the exclusion of other children has led to acrimony and serious conflicts among the eldest son and other male children of the other wives of the deceased.⁴⁹

Consequently, there is general discontent among the people with the primogeniture rule. The Bini people have modified the rule to permit the children of the other wives of a deceased person to inherit his estates. This has led to the evolution of the Urho system of inheritance. Urho literally means per stirpe. Per stirpe means the property of a deceased Bini man will be distributed

⁴¹. Ibid

⁴². The Oba of Benin, or Omo N'Oba is the traditional ruler of the Edo people and head of the historic Eweka Dynasty of the Benin Empire. The title of *Oba* was created by Oba Eweka 1, Benin Empire's first "*Oba*".

⁴³. Jaiyeola Mulikat Bolaji, *supra*

⁴⁴. Ibid

⁴⁵. Ibid

⁴⁶. (1967) NMLR 245

⁴⁷. Jaiyeola Mulikat Bolaji, *supra*

⁴⁸. Ibid

⁴⁹. Ibid

according to the number of his wives who have children for him.⁵⁰ The properties distributed are for the children and not for the wives.⁵¹ Under the *Urho*, the eldest son is entitled to a lion's share of the deceased property which is usually his main or principal dwelling house i.e. the *Igiogbe*.⁵² Although, the eldest son is still given precedence over the other children, the modification of the primogeniture rule by the *Urho* system which entitles all the children of the deceased to inherit his property is more equitable than the primogeniture rule which entitles only the eldest son to inherit the property. The *Urho* system is also stated in the handbook on some Benin custom and usages.⁵³ With the evolution of the *Urho* system of inheritance, the burden of the full burial ceremony of his deceased father solely borne by the eldest surviving son is no longer the practice. The full burial ceremony is now jointly done by all his children.⁵⁴

5. Conclusion

Drawing attention from the above, it is clear that the Benin customary law of inheritance based on primogeniture and *Urho* rules that the Benin custom placed a premium on male children vis-à-vis female children.⁵⁵ The primogeniture rule which prescribe that the eldest male surviving child of a deceased Benin man should inherit all his property to the exclusion of other children was deemed to be very unfair. Hence, the *Urho* rule was introduced to modify the primogeniture rule with its inherent injustice. By the *Urho* rule, the children (both male and female) of a deceased Benin man who had more than one wife are entitled to share in the estate of their father as the property is shared among the children of the wives of the man.⁵⁶

By no stretch of imagination, it is obvious that both the primogeniture and *urho* rules of inheritance are discriminatory against women. This is because although the *urho* rule allows female children to share in the property of their deceased father with the male children, precedence is given to the male children.⁵⁷ This sort of discrimination by reason of sex is against the provision of section 42 (1) of the 1999 constitution.⁵⁸ Therefore, the Benin customary law of inheritance, even though of historical foundation, discriminates against women by reason of birth as females, is unconstitutional.

⁵⁰ Ibid

⁵¹ Ibid

⁵² Ibid

⁵³ Ibid

⁵⁴ Jaiyeola Mulikat Bolaji, *supra*

⁵⁵ Ibid

⁵⁶ Ibid

⁵⁷ Ibid

⁵⁸ Constitution of the Federal Republic of Nigeria 1999 (As Amended)



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