CHAPTER ELEVEN

LAW AS NARRATIVE IN TUNDE KELANI'S SELECTED FILMS

SOLA ANIMASAUN

Introduction

The cinematic practice that preceded Nollywood was predominately of the Yoruba traditional theatre form (Haynes, 2011). The prominent directors of that era were Halilu, Dosumu, Eddie Ugbomah, Moses Olaiya (Baba Sala), Hubert Ogunde, Adeyemi Afolayan (Ade Love), Ladi Ladeebo, Bayo Aderohunmu, Francis Oladele, Afolabi Adesanya and a few others (Adesokan, 2012). These pioneer producers' default format of filmmaking was celluloid film stock (Adesokan, 2012). The new generation of film directors to which Tunde Kelani belongs, which is now known as Nollywood, utilizes video or digital formatted film, although he was also part of the earlier era as a cinematographer or director, with varied experience in television and cinema (Adesokan, 2012). Most Nollywood films are of poor quality, handled with carelessness, done in a haste, and they may not even have a script, so actors are requested to improvise (Haynes, 2011). Nollywood frequently neglects the visual aspect of cinema, tolerating bad acting and low technical quality in favor of narrative (Haynes, 2011). These lackluster attributes may not be unconnected with Tunde Kelani's dissociation with Nollywood when he claimed that he was not part of the industry. Thus, one could not disagree with Haynes' assertion that Tunde Kelani and Kunle Afolayan are not really Nollywood filmmakers, though they have affiliations with it (Haynes, 2011: 79).

Tunde Kelani has become a legend in his own life. He is "the most respected Nigerian director" (Haynes, 2014: 57; Haynes, 2011: 79; Soetan, 2019: 4-6; Adesokan, 2009; Adejumobi, 2005). Kelani occupies a larger than life place in Nollywood studies; moreover, he is regarded essentially as an auteur and being a principal part of "the other Nollywood" (Afolayan, 2020: 356-367). The quality of his production is very good, his narratives have

more complex plots, and they are rarely defined by metaphysical and mythical notions only, which is a major feature of a lot of Nigerian films. Although Tunde Kelani's narratives are discussed more in the context of literary and film studies, this study is on the law and narrative in two of his films: *Saworoide* and (its sequel) *Agogo Eewo*. This narrative may be lost to the less discerning due to the absence of court scenes and lawyers adorned in their wigs and gowns, which are known features of the modern legal system; nevertheless, the films are essentially about the Yoruba customary law of succession, traditional checks and balances on the powers of the ruling elites, and the consequences of the violation of the law.

Tunde Kelani's seems to have, in most of his films, a recurrent theme of law and order. Customary law, land disputes, perjury, conspiracy and corruption (including several court scenes, involving lawyers arguing cases in contemporary law courts) appear in *Ti Oluwa Ni Ile*. Criminal law is a thread running through *Koseegbe* and *The Narrow Path* in some parts concerns family law. This paper, though, focuses on *Saworoide* and *Agogo Eewo*, and interrogates the theme of law and order as embodied in Yoruba customary law.

The Meaning and Nature of Customary Law

The Indigenous legal order, which comprises of the age long rules used by the people to govern themselves, is normally referred to as Yoruba customary law, *Ofin* (Lloyd, 1962: 3-10) and, punishment, *Ijiya* (Nigeria University Press, 2001: 46). The latter involves the infliction of pain or other odious consequence upon a person for the violation of the law; a mechanism by which the Yoruba society frowns at impropriety of manners and socially unacceptable actions and habits, which are inimical to the developments of legal norms and disruption of the social equilibrium (Balogun, 2009: 45).

Customary law consists of the indigenous customs of the traditional communities (Obilade, 1979: 83). Unlike ordinary social habits and observances, the rules carry along with them sanctions for their breach (Kuruk, 2002: 4). For the most part, the rules are unwritten (*leges non scriptum*), though efforts are now being made to compile them in written form. One must differentiate, then, between a custom and a customary law: a custom is simply a rule of conduct, but when such a rule of conduct attains a binding or obligatory character it becomes a customary law. It is the assent of the community that gives a rule of conduct its obligatory nature and entails that it is supported by a sanction, and is thus enforceable (Adaramola, 2003: 109). Sanction under customary law, however, does not have the same

nature as the sanctions of a modern state, with its full machinery for the administration of justice. Customary sanction takes the form of ostracism, compensation, propitiation, restoration, apology, capital punishment (Onipede et al., 2014) or sending a convict or a recidivist to fight an intractable enemy. It is this element of sanction that distinguishes a custom from customary law (Nwabueze, 2002: 158).

Nigerian courts have ably defined customary law. In *Kharie Zaidan versus Fatima Khalil-Mohssen* (1973: 86), the Supreme Court of Nigeria defined customary law as: "any systems of law not being the common law not being a law enacted by any competent legislature in Nigeria but which is enforceable and binding within Nigeria as between the parties subject to its sway". Recently, the same court, in *Bilewu Oyewumi versus Amos Ogunesan* (1990: 182), gave a more detailed definition of customary law as follows:

> Customary law is the organic or living law of the Indigenous people of Nigeria, regulating their lives and transactions. It is organic in that it is not static, is regulatory in that it controls the lives and transactions of the community subject to it. It is said that custom is the mirror of the culture of the people. I would say that customary law goes further to impart justice to the lives of those subject to it.

The origin of the customary law is not unlike the English common law, which Austin (1885: 87) described, at its origin, as being a rule of conduct which the governed observe spontaneously, not in pursuance of a law set by a political superior. This common law or custom is converted into positive law when it is adopted by the courts, and when the judicial decisions fashioned upon it are enforced by the power of the state:

> But before it is adopted by the courts, and clothed with the legal sanction, it is merely a rule of positive morality: a rule generally observed by the citizens or subjects; but deriving the only force, which it can be said to possess, from the general disapprobation falling on those who transgress it (Austin, 1885: 87).

Customary law is not static (Cotran and Rubin, 1970). It is dynamic and its rules change from time to time to reflect changing socio-economic conditions. As noted in one judicial decision, the most striking feature of native custom is its flexibility; it appears to be subjected to motives of expediency and shows unquestionable adaptability to altered circumstances without entirely losing its character (*Lewis versus Bankole*, 1909: 100-101). Like any system of unwritten law, customary law has the capacity to adapt itself to new and altered facts and circumstances as well as to changes in the economic, political and social environment. Thus, it has adjusted to such

influences as the introduction of European, Islamic law and other foreign legal systems in Africa, to urbanization, and to the growth of the money economy. This dynamism of customary law is illustrated in customary law rules about land ownership, where it is now possible to own land individually (unlike in earlier times where land belonged to the family or the community as a group and no individual could own a piece of land absolutely or alienate it) (Kuruk, 2002: 7). Customary law remains flexible, evolutionary, and capable of adaptation to changing circumstances.

Again, a major characteristic of customary law is that parties to a dispute subject to customary law are seldom strangers to each other. There is usually a tie—social, marital or tribal (Lloyd, 1962: 17-18). However, there are few instances where there are exceptions to this rule. Thus, there are three types of customary laws (Adaramola, 2003: 106-107). The type that binds indigenes and non-indigene alike, such as laws regulating the use and alienation of land by the doctrine of *ratione loci*, by reason of geographical area concerned; those that bind indigenes only, irrespective of their abode, for instance succession, widowhood, marriage (*ratione personae*) by reason of its attachment to their person; and those that bind indigenes alone when they reside in their native land (*ratione loci et personae*), such as laws regulating chieftaincy, traditional institutions, or traditional roles of gender. A Nigerian of a particular extraction who is ordinarily amenable to customary law of their community may opt for another law such as English common law or Islamic law in respect of certain transactions (Adaramola, 2003).

The Yoruba Law of Succession and Adaptability

The courts (even after the introduction of the English court system), in applying Yoruba customary law based on the evidence proffered by the natives, have consistently noted its flexibility and adaptability. Thus, in *Dawodu versus Danmole* (1962: 1053) the court held that a deceased Yoruba man's self-acquired properties could be distributed per stripe (*Idi-Igi*) or per capital (*Ori-Ojori*). It is the prerogative of the head of the family to decide which is appropriate in the interest of justice to the beneficiaries in the extant case. This reasoning was followed in *Akinyede versus Opere* (1968: 65) and *Adeniji versus Adeniji* (1972: 305-306).

The law of succession involves the transmission of the rights and obligations of the deceased person in respect of the estate to his heirs and successors. It equally deals with the rules governing the administration of the estate by the personal representatives of the deceased person including

state participation in respect of the real estate situated within its territory and personal estate of the deceased person subject to its jurisdiction (Oni, 2008: 40; Oni, 2014: 30). Succession may be testate or intestate. Where a deceased person made a will, he is said to have died testate. Where a deceased person did not make a will, he is said to have died intestate. In customary law, this distinction is of marginal importance because under customary law, intestacy is the rule. The only consideration of a testate succession under customary law is a nuncupative will, which is also known as a death-bed declaration. Succession therefore refers to the body of law concerning the distribution of a deceased person's property. It is invariably woven with the concept of inheritance which in simple parlance is the fact of receiving some properties, real or personal, by those entitled when another dies. Succession is embedded in inheritance (Adesanya, 2009: 3). It involves issues such as primogeniture, where property devolves on the eldest child; ultigeniture, where it devolves on the youngest child; paritable inheritance, where every child inherits equally; patrilineal succession, where only male children inherit property and title; and matrilineal succession where only female children inherit.

Under the Yoruba customary law of inheritance, it is the children that inherit the real property of the deceased to the exclusion of the deceased blood relations. Accordingly, if an individual dies intestate, his children both male and female succeed to the estate as a single entity. The eldest son, known as *Dawodu,* if he is of age*,* has the responsibility for the management of the estate. The children and widows though have the right to live in the house, but a widow who takes another husband loses her right. The *Dawodu* has no right sell the land or the house for he holds it in trust for the family. The claim of ownership by any family member must be supported by proof of partitioning of the family property. In *Salami versus Salami* (1924: 43) it was held that the plaintiff's right to inherit her father's estate along with her two brothers was not diminished by the fact that she was a girl. Similarly, in *Richardo versus Abal* (1926: 58) not only did the court accept the proposition that a female child has inheritance rights, but it went further to hold that when a man dies leaving two houses and two children, male and female, the female if older has the first choice as to which house she wants when the property is eventually partitioned.

In this paper, the type of succession that is of concern is succession to title. Under the Yoruba law of succession, every male member of the royal lineage is entitled to contest for the vacant royal stool and one of them would eventually be elected by the Kingmakers. The selected candidate must undergo the traditional rite of succession (Johnson, 1973). The power of

Yoruba kings, though referred to as absolute in theory is actually restricted in practice (Johnson, 1973). For instance, the powers of the premier Yoruba monarch, the Alaafin, though immense and considered absolute were actually constrained by religious, institutional and constitutional means (Rotimi, 1971; Johnson, 1973; Adeyemi, 2005; Adeyemi, 2011; Mustapha et al., 2007; Ogundiran, 2012; Omojola, 2013; Falola, 2017).

Customary Law in Tunde Kelani's Selected Films

As stated earlier, Tunde Kelani's films are laced with themes promoting law and order, and the consequences of their breach in society. The films under discussion here essentially portray Yoruba customary law, although there are certain aspects of the modern legal system, depicted by the presence of the police, army, and a uniformed environmental enforcement squad. The section below examines the legal themes in *Saworoide* and *Agogo Eewo.*

Saworoide: The Brutal Consequences of Suppressing Legitimate Custom

There is a difference between custom and customary law. The difference is that, though the former is an expected behavior, no sanction is attached to its violation, while the latter attracts sanctions of punishment known as *Ijiya.* Sometimes, the *Ijiya* is imbedded in the indigenous religion. In *Saworoide,* the audience are treated to an ancient pact in the fictional state of Jogbo, between the successive Kings (Oba) and his subjects. Thus, a newly installed king is obliged to take an oath of office and an incision to the head. The king is thereafter entitled to wear the brass crown (*Ade Ide*) and the official drummer beats the ancient royal talking drum (*Saworoide*). Any king who fails to perform all these traditional rites must not wear the crown; should the uninitiated king wear the crown, he will die of a splitting headache (*ijiya*) and his tenure would be over once the court drummer, the Ayangalu, beats the ancient drum whenever the king is in state. These rites serve as a check on the king's excesses and are ingrained in the indigenous religion of the Yoruba people, laying the foundation of the kingship as an institution. Lapite (the new king) refuses to perform the traditional rites which makes him susceptible to the punishments listed above.

The chief priest (Amawomaro) and the court drummer (Ayangalu) who were witnesses to Lapite's gross violation of the tradition—that is, the desecration of the state's constitution—refuse to reveal that Lapite did not

finish the traditional rites because he threatens them with a gun. Amawomaro and Ayangalu's muteness has a far-reaching detrimental effect for the both of them, on the one hand, and the state as whole, on the other hand. Ironically, the chief priest who fails to divulge Lapite's violation of the state's constitution because of the threat of a gun by only one person in *Saworoide* displays an amazing supernatural power when three assassins are sent to terminate his life in the dead of the night in *Agogo Eewo*. He chants incantations which render the assassins helpless until daybreak, when the law enforcement agents arrive to take the assailants into custody.

Lapite's refusal to adhere to the state's constitution threatens his legitimacy. To cover this anomaly, he institutes the state sponsored murder of his erstwhile rival, Adebomi, and his wife (who incidentally were the son-in law and the daughter of Ayangalu). This also leads to Ayangalu, his grandson (the son of Adebomi), his adult son (Ayanniyi), and his family leaving for exile to avoid imprisonment on trumped up charges or being murdered by state operatives. Ayangalu is eventually hounded out in exile, forcefully taken back to Jogbo and imprisoned on the order of Balogun (a senior chief and a kingmaker), after the demise of Lapite.

Amawomaro, the chief priest, is relegated in state affairs and insulted on a few occasions when he is brought before Lapite. Lapite becomes uncontrollable, employing despotic powers to stifle the opposition, such as imprisonment, arrest, torture, murder and the threat of any of these. He (and by extension his court) begin amassing stupendous wealth by violating the existing law of sustainable development enacted by his predecessors. This law prohibits the felling of unripe trees and felling of trees in the sacred groves. This law of sustainable development also mandates the harvesters to plant a new tree for every felled tree. Consequently, this unwritten law protects the right of the farmers and others who depend on the forest for their livelihood. It provides for the preservation of wildlife and prohibits the exportation of wildlife. It also protects against the destruction of farmland. Lapite grants the multinational logging companies wide powers to import arms and ammunition, as well as license to behave as they desire. He also plans to attempt a constitutional breach by amending the constitution with a decree that only sons born on the throne to the reigning monarchs would be entitled to be king; thus, only his own sons, would continue to be king *ad infinitum*. He was unable to finalize this plan however because his wife, Olori Tinuola, was unable to conceive afterward.

These violations and subversions of the customary laws and of human rights eventually lead to economic hardship, rebellion, and the breakdown of law

and order. The highlight is the removal of the Brass Crown (*Ade Ide*) from Lapite's head—a symbolic taboo. The punishment of this infraction entails the king committing suicide or his voluntary going into exile if the crown is not returned to the palace within fifteen days. The multinational logging companies aid Lapite in recovering the crown before the expiration of allowable time by withdrawing their support from the youth freedom fighters, who removed the Brass Crown in order to force the king to relinquish power.

The head of the Army, Lagata however commits a constitutional breach at the victory gala organized by Lapite to celebrate the recovery of the Brass Crown, by staging a coup d'état. Lapite is killed by the coup plotters and Lagata is installed as the new king. During Lagata's short reign, Ayangalu is imprisoned, while Amawomaro never has an audience with the new "king". It should be noted that during this period the sycophancy of some reaches a higher level, with two groups of courtiers paying solidarity visits to Lagata. These two groups vow that "they are ready to die for the new king", and are received at the court by Chief Seriki, who ushers the groups' leaders into Lagata's presence. This mirrors the real-life occurrences in Nigeria, whereby groups and individuals (including statesmen and traditional rulers) pay unending solidarity visits to new, usually unpopular rulers who come to power through a coup d'état. Such regimes normally give free reign to sycophants to organize rallies and marches but hound the opposition representing the majority from embarking on peaceful protests. This practice reached new heights under General Abacha's administration when sycophancy became an art. During this period all political parties adopted Abacha as their presidential candidate and the unpopular but pro-government, the Youth Earnestly Ask for Abacha (YEEA) and similar bodies were bankrolled and given free reign (Olukotun, 2004). Opposition organizations like the National Democratic Coalition (NADECO) were outlawed, and its leaders (especially the Yoruba intelligentsia and political elites) were hounded, assassinated, imprisoned and exiled (Osaghae, 1988; Akintoye, 2010).

Lagata, who forcefully took over the affairs of the state was not of royal blood, and, is not only oblivious of the legitimacy rites, but of the consequences of their breach when he requests to be crowned as king. Unbeknownst to the Jogbo's ruling class, with the exception of Chief Bada and the Chief Priest, Ayangulu's son, Ayanniyi—someone qualified to beat the royal drum (*saworoide*), since he had undergone the initiation rites—had arrived home from exile. Ayanniyi beats the *saworoide* at the hearing of Lagata with tragic consequences. Lagata dies and this leads to a stalemate

and an interregnum. Chiefs Balogun and Seriki are surprised to find in attendance an initiate who could beat the drum, as Ayangalu had been detained on the former's order. It is instructive that despite the fact that a youth leader, informant and double agent known as Kangidi—who gave information leading to Ayangalu's arrest—must have revealed Amawomaro's part in the conspiracy to change the government forcefully (treason), he was not questioned, arrested or even put under surveillance. Likewise, the palace wit, Opalaba was opposed to the antics and exploits of the corrupt chiefs and their king, but he too was not censored. The failure to deal with the former may be predicated on the sacredness of his office or the inefficiency of the law enforcement operatives; while the latter may be viewed as a harmless fellow who was otherwise useful as the court historian. It is noteworthy to state that Opalaba retires before the enthronement of Adebosipo in *Agogo Eewo,* though, he continues to feature as a social commentator in the film, from his residence rather than from the palace.

Agogo Eewo: A Clash of Two Worlds and the Triumph of Good over Evil

In *Agogo Eewo*, the sequel to *Saworoide*, the gifted director, Tunde Kelani crafts another piece of Yoruba-centric neo-traditional cinema (Adesokan 2009: 614). The new king, Adebosipo, expands his cabinet; he introduces two female chiefs, Iyalaje and Iyalode, and two other male chiefs, Oloto and Agbaakin. Oloto, the only provincial chief who opposed Lapite—who was tortured and imprisoned in *Saworoide*—is elevated to the cabinet. Also, Fadiya, the leader of the farmers' union, who was also imprisoned by Lapite, is designated a cabinet ranked minister, the Agbaakin. Similarly, another female chief, Akeweje (head of the youth) is introduced, but she is not of cabinet rank as she never features in any of the cabinet's deliberations. It is likely that Oba Adebosipo made these additions to his cabinet in order to strengthen his hand in implementing his reforms. The king must have acted *intra vires* as no opposition to his action was shown in the film. A violation of the law is revealed when one of the chiefs, Balogun calls the king by his name to his face (a taboo). Chief Balogun and the other chiefs, promptly apologize for the breach and are warned against such transgressions in future.

Adebosipo, unlike his two immediate predecessors, observes all the traditional rites. He is thus constrained by his oath of office from engaging in corrupt practices. He has to contain his wife to conform to his resolve, to stamp out corruption and embrace austere living. He is bent on eradicating

corruption in the state and ensuring public accountability, but his effort at reforming the system is thwarted by some of his senior chiefs, Balogun and Seriki, and to a lesser extent by their cohorts, Bada and Iyalaje. There are continuous clashes between this group of corrupt chiefs and the royalists/reformers (Otun, Iyalode, Oloto and Agbaakin), the last three chiefs being new cabinet members, who are pro-Oba Adebosipo. The corrupt chiefs instigate paid agents to demonstrate against the new regime, however, the corrupt practice complained of by the orchestrated demonstrators indicts only their corrupt paymasters who are mandated to refund the money collected in an inappropriate manner from the masses.

Adebosipo's dream and the frustration he experiences in reforming the state due to the detrimental antics of some of his chiefs make him inquire with the Chief Priest to see if any systems exist by which traditional checks can be enacted on the chiefs, as the *saworoide* checks the excesses of the king. The priest answers in the affirmative and the *agogo eewo* (gong of taboo) rituals are instituted. Thus, in *Agogo Eewo*, there is a public trial of the chiefs. An oath of accountability is administered to the chiefs in the full view of the general public and those with vested interests— represented by the law enforcement agents, the thugs contracted by the corrupt chiefs, the radicals inspired by Agbaakin and Oloto, the royalists contracted by Iyalode and Akeweje, and the Ifa devotees. The public trial leads to altercations between these groups and espouses the low esteem in which the public hold the law enforcement agents. The head of the rival groups at the trial (the pro-royal and anti-royal groups) refuse the unsolicited intervention of the police chief in their rift. The police chief is advised to engage in the solving of weightier law enforcement issues (such as foiling the daylight armed robberies plaguing the state), rather than intervening in inter group rivalries. The public trial of the chief leads to the death of the two of the conspirators (Seriki and Balogun) who fail to confess at the beating of the sacred gong, whereas the lives of the two remaining corrupt chiefs, Bada and Iyalaje, are spared by their confessions. It must be mentioned that Bada was not as incorrigible as Balogun and Seriki. He was pro-masses in most cases— indeed, he gave privileged information to Ayangalu which saved the life of the latter. Bada's recommendation made Ayanniyi be commissioned as a member of the royal drumming troupe, whereby he beats the ancient royal drum leading to Lagata's demise. These acts would have made Chief Bada liable to be tried for conspiracy to commit treason or treasonable felony, were his activities known to the law enforcement agents. Also, his advice to Lapite was usually pro-masses, this gesture prevented him from being one of his (Lapite's) favorite chiefs. He however, could not keep his fingers

from the state lucre; he still aligned himself with the corrupt Chiefs Balogun and Seriki.

There is a blend of ancient Yoruba cultural practice and modern practice in the selected films. There are traditional palace guards and modern police, for instance. Some flaws can however be observed in the film, with regards to law enforcement mechanisms. The policemen tie the three assassins sponsored by the corrupt chiefs to kill Amawomaro, the chief priest, with a rope instead of putting them in handcuffs, the method normally employed by policemen. Second, there is also the likely contamination of the evidence by the desk policeman who handled the gun and other accessories used by the assassins. This improper handling of evidence without a glove would imprint the policeman's fingerprints on the evidence, which must be an oversight on the part of the director and the scriptwriter. These scenes seemed to be the low points in this narrative. In *October 1,* a film set at an earlier period than *Agogo Eewo*—precisely, in the pre-independence era—handcuffs were used to restrain suspects in the film. Also, the inspector rebuked his subordinate, Sergeant Afonja for failing to follow the normal police procedure of setting up and securing the crime scene perimeter. However, like *Agogo Eewo*, gloves were not used by the policemen in *October 1,* even in handling dead bodies, and it seems that forensic evidence was not so important or probably unknown in Nigeria in the period when the film was set, probably in the early 1970s. Furthermore, the standard of hygiene in that period (between pre-October 1 1960 and the early 1970s) must have been low as depicted in the extant film, *vis-a-vis* the handling of murder victims. Notwithstanding, there is a Nollywood film, *Murder at Prime Suites*, that scores highly in this regard, that is, in the proper handling of evidence by law enforcement agents, but this may not be unconnected with the fact that this film was set in the contemporary era.

Transgression and Punishment

Traditional societies create norms and mores, thereafter making a law (*ofin*). The violation or transgression of the law (*ese*) attracts sanctions or a punishment (*ijiya*). These films mirror the occurrences in the Yoruba traditional institutions whereby the operators are not satisfied with the status quo. A prominent Yoruba Oba stated that he, alongside other Obas in his domain should be buried in line with their religious belief, that is, Christianity or Islam (Olukoya, 2017). He has his supporters (the modernists) who believe that the old practice is fetishistic, outdated and primitive. The opponents of the idea (the conservatives) pointed out that

Islam and Christianity were not the originator of the institution of *Obaship* and that this act runs counter with the demands of the institution, thereby advertising its eventual demise. Until recently, Obas' selection, ascension and demise, were shrouded in secrecy and known only to the initiates. The conservatives opined that this alteration was bound to have grave consequences. This proposition is not unlike Lapite's refusal to follow the traditional rites which created succession problems, political upheavals and the violation of established law, with tragic consequences to the state, elites and the masses. Lagata's coup d'état equally created constitutional crises, an action which led to his imminent death on the coronation day as the punishment for breaching the law.

Likewise, in *Agogo Eewo*, for their wrongdoings the affected chiefs' refusals to confess, take the antidote, and swear to an oath of allegiance thereafter led to their disgraceful death. It is important to state that most of these checks and balances were anchored on mysticism, magic and the operation of karmic law. Also, one should not be oblivious of the role of public opinion; the chiefs in most cases, and sometimes the entire court were unpopular with the citizenry, as they were normally booed and called unprintable names at state functions from time to time.

The films also espouse the quintessential human nature of seeking shortcuts from paying one's karmic debt through the exploration of physical and metaphysical methods. Balogun and his cohorts sought the physical elimination of the chief priest, which was not successful, in order to abort the oath taking ceremony by the chiefs. Likewise, Iyalaje arranged for a liaison that could land the king into trouble had he fell for the bid. Spiritually, the affected chiefs all employed sacrifice, prayers, propitiation, spellcasting and incantations as a solution or freedom from punishment for their wrongdoing. Thus, the action (commission of crime), maintaining of the status quo (inaction) and reaction (punishment) for the action taken is shrouded in magic, the retributive power of oath violation, and punishments connected with breaking covenants. The covenant in *Agogo Eewo* is of a milder form as it permits forgiveness or restitution in the form of a confession, in contrast to *Saworoide*, where the sanction for infringing the law is capital punishment. Finally, police brutality, inefficiency, corruption and extra judicial killings were shown in these two films. The films mirror the Nigerian police who possess all the attributes stated above, to the extent that ENDSARS protests which recently rocked the major Nigerian towns were embarked on by Nigerian youths (Congressional Research Service, 2020: 1-2; Uwazuruike, 2020*:* 1-3). During the ENDSARS protests, many public buildings, including police stations and court rooms, were burnt and

vandalized (ibid). However, the police as perpetrators of evil deeds such as brutality, inefficiency, partiality and corruption, mentioned in *Saworoide* and *Agogo Eewo*, did not suffer any serious retribution in these films, but the police were depicted as being held in very low esteem by the public in both. This is not unlike the reality in contemporary Nigeria where the police are viewed with contempt and also held in low esteem by the public.

Conclusion

Tunde Kelani is a prodigious and gifted director who has been able to blend mysticism, metaphysics, law and other components into his films, lending itself to a unique narrative. The subtle and sophisticated manner through which he merged the modern with the ancient, and fused African traditional religion with customary law and modern law enforcement is legendary. The work shows the clash between those who were desirous of subverting traditional law and order, the basis of their legitimacy, but who wished to enjoy the privilege of such offices. I caution those modernists to make haste slowly so that the foundation of the legitimacy of such exalted positions are not destroyed completely. Lastly, it is observed that Tunde Kelani has been consistent in creating scenes in his films, including the selected films, which glorify the importance of law and order in any collectivity thereby, creating some sense of stability at the end of each narrative.

Bibliography

Adejumobi, Moradewun. (2005) "Reading Video, Film and Narrative Commerce in West Africa". Canadian *Review of Comparative Literature/ Revue Canadienne de Ltitérature Comparée CRCL/RCLC 32* (3-4), 280-301.

Afolayan Adeshina. (2020) "Túndé Kèlání and the Art of Being Yorùbá." *Journal of African Cultural Studies, 32* (4), 354-366.

Adeniji versus Adeniji (1972) 1 All NLR 298.

Adesanya, Bambo (SAN) (2015, November) *Marriage, Divorce and Succession: The Legal Aspects.* Paper presented at the Dioceses of Lagos West, Nigeria. Retrieved December 2, 2019 from http://www.dioceseoflagoswest.org/PastoralIssues/Teachings/MARRIAGE,%20DIVORCE%20AND%20SUCCESSION%20-%20THE%20LEGAL%20ASPECTS.htm.

Adesokan, Akin. (2012) Nollywood and the Idea of the Nigerian Cinema. *Journal of African Cinemas 4* (1) 81-98.

Adeyemi, Lamidi Olayiwola. (2011 August 22) Civilisation Started from Yoruba Kingdom. Focus. Retrieved December 2 2020 from http://isokanfpb.blogspot.com /2011/03 /civilisation-started-from-yoruba.html.

Adeyemi, Lamidi Olayiwola. (2005) Oyo Empire. Retrieved December 2 2020 from http://www.alaafin-oyo.org/main/the-oyo-empire.

Akintoye, Stephen Adebanji. (2010) *A History of Yoruba People.* Dakar: Amalion Publishing.

Akinyede versus Opere (1968) 1 All NLR 65.

Nigeria University Press. Eds. (2001) *A Dictionary of the Yoruba Language*. Ibadan: University Press.

Austin, John. (1885) *Lectures on Jurisprudence or the Philosophy of Positive Law, Vol. 1, 5th Ed*. London: John Murray.

Awere versus Osudipe (1987) 11 OYSHC (pt. 11) 790.

Ayittey, George. (2006) *Indigenous African Institutions*. Ardsley-on-Hudson: Transnational Publishers.

Barreto versus Ontiga (1961) WLR 58.

Bilewu Oyewumi versus Amos Ogunesan, [1990] 3 NWLR (pt. 196) 182.

Congressional Research Service. (2020) Nigeria: #EndSARS Protests against Police Brutality. Retrieved December 2 2020 from https://www.everycrsreport.com/files/2020-10-7_IN11525_d3e462e227983cf834af2389162df64f03a324fe.pdf.

Cotran Eugene and Neville Rubin. (1970) *Readings in African Law.* London: Frank Cass & Co.

Haynes, Jonathan. (2011) "African Cinema and Nollywood: Contradictions". *Situations, Project of the Radical Imagination, 4* (1), pp. 67-90.

Haynes, Jonathan. (2014) "'New Nollywood': Kunle Afolayan" *Black Camera, 5* (2), pp. 53-73.

Johnson, Samuel. (1973) *The History of the Yorubas*. Lagos: CSS Bookshop.

Kharie Zaidan versus Fatima Khalil-Mohssen. (1973) 1 ALL NLR. 86.

Kuruk, Paul. (2002) "African Customary Law and the Protection of Folklore." *Copyright Bulletin, 36* (2), 1-10.

Lewis versus *Bankole.* (1901) Nigerian Law Reports Vol. 81, 100–101.

Lloyd, Peter Cutt. (1962) *Yoruba Land Law.* London: OUP.

Mustapha, Oyebamiji. et al. Eds. (2007) "Eko Ede Yoruba Titun Iwe Kin-in-ni". *Isedale Yoruba* Ibadan: University Press Plc, pp. 1-10.

Nwabueze, Remigius. (2002) "The Dynamics and Genius of Nigeria's Indigenous Legal Order". *Indigenous Law Journal 1* (1), pp. 153-199.

Obilade, Akintunde Olusegun. (1979) *The Nigerian Legal System.* Ibadan: Spectrum Books.

Ogundiran, Akinwumi. (2012) "The Formation of an Oyo Imperial Colony during the Atlantic Age". *Power and Landscape in Atlantic West Africa Archaeological Perspectives.* Monroe Cameron and Ogundiran Akinwumi. Ed. Cambridge: Cambridge University Press, pp. 222-254.

Olukotun, Ayodeji. (2004) *Repressive State and Resurgent Media under Nigeria's Military Dictatorship 1988-1998.* Uppsala: Nordiska Afrikainstitutet.

Olukoya Oluwole. "Ijebu Obas Now to be Buried According to Their Faiths —Awujale" *Nigerian Tribune*, (January 4, 2017) p. 17.

Omojola, Baba Oniwinde. (2013, November) "My African Identity, Who am I?' Order of Service & Interment for B.O. Omojola" p. 2.

Oni, Babatunde Adetunji. (2008) "The Rights of Women to Inheritance under Nigerian Law: An Evaluation" *Nigerian Journal of African Law* 2 pp. 40-53.

Oni, Babatunde Adetunji. (2014) "Discriminatory Property Inheritance Rights under the Yoruba and Igbo Customary Law in Nigeria: The Need for Reforms" *IOSR Journal of Humanities and Social Science 19* (2), 30-43.

Osaghae, Eghosa. (1998) *Crippled Giant: Nigeria since Independence.* Indianapolis: Indiana University Press.

Owoyin versus Omotosho (1961) 1 All NLR 304,309.

Rotimi, Ola. (1971) *Kurunmi.* Ibadan: University Press Plc.

Salami versus Salami (1924) 5 NLR 43.

Soetan, Olusegun. (2019) "The Hearthstone: Language, Culture, and Politics in the Films of Tunde Kelani". *Polymath: An Interdisciplinary Arts and Sciences Journal* 8(2), pp. 1-26.

Uwazuruike, Allwell. (2020) "#EndSARS: The Movement against Police Brutality in Nigeria" *The Harvard Human Rights Journal* pp. 1-7.

Filmography

Afolayan, Kunle. (Director). *October 1*, Lagos: Golden Effects Studios, 2014.

Eneaji, Chris Eneng. (Director). *Murder at Prime Suites.* Lagos: C&C Screen Productions, 2013.

Kelani, Tunde. (Director). *Agogo Eewo.* Lagos: Mainframe Film and Television Productions, 2002.

—. (Director). *Saworoide.* Lagos: Mainframe Film and Television Productions, 1999.