

# Shari'ah and the Challenge of Muslim-Christian Peaceful Co-Existence in Nigeria

Labbo Abdullahi<sup>1\*</sup>, Aminu Adamu Argungu<sup>2</sup>

<sup>1</sup>Department of History, Usmanu Danfodiyo University, Sokoto, Nigeria

<sup>2</sup>Aminu Adamu Argungu, Division of General Studies, Kebbi State University of Science and Technology, Aleiro, Kebbi State, Nigeria

\*Corresponding author: Labbo Abdullahi

| Received: 09.01.2019 | Accepted: 18.01.2019 | Published: 29.01.2019

DOI:10.21276/sjhss.2019.4.1.6

## Abstract

The *Shari'ah* controversy is an issue that is burning in the hearts of many Nigerians, as they express their opinions in books, newspapers, magazines, Mosques, Churches and many other sources of disseminating ideas and beliefs. Most Christians seem to be antagonists and viewed Muslims as protagonists of *Shari'ah* through their opinions. This has a negative impact on Muslim-Christian relations and peaceful co-existence in the country. The *Shari'ah* in Nigeria has a long history dating back to the fifteenth century when Rumfa, the Emir of Kano introduced it and the Mais of Borno (Emperors of Borno Empire) institutionalized Islam as state religion with *Shari'ah* as a legal code. This study examines the controversies over the implementation of *Shari'ah* legal system and how the issue of *Shari'ah* affects Muslim-Christian relations and peaceful co-existence in Nigeria. The paper begins with conceptual discussion about *Shari'ah*. This is followed by an account of the history of *Shari'ah* in Nigeria, colonialism and *Shari'ah* as well as the bases for Christians' antipathy of *Shari'ah* implementation in Nigeria. The paper also discusses the impact of Christian perception of *Shari'ah* on Muslim-Christian relations and finally makes a conclusion.

**Keywords:** *Shari'ah*, Muslim-Christian Co-existence and Nigeria.

**Copyright © 2019:** This is an open-access article distributed under the terms of the Creative Commons Attribution license which permits unrestricted use, distribution, and reproduction in any medium for non-commercial use (NonCommercial, or CC-BY-NC) provided the original author and source are credited.

## INTRODUCTION

### *Shari'ah*: A Conceptual Discussion

*Shari'ah* is an Arabic word which in its literal meaning refers to a trail to watering place or any path that leads one to get water [1]. Similarly, *Shari'ah* means a water hole where animals gather daily to drink water [2]. This shows that the word *Shari'ah* carries in itself, the basic of human life, because every living thing was created with water and so also cannot survive without it. Technically however, *Shari'ah* means everything that Almighty God ordains His servants to do in order to serve the essence of their being created [2]. It is thus, the path that Allah has ordained to be followed by every Muslims to earn his pleasure and to avoid his wrath in this world and hereafter. In the Holy Qur'an, Allah shows that *Shari'ah* is his way and that Prophet Muhammad (SAW) was put on the trail and he should abide by it (Qur'an chapter 45:18 and 19) [3]. Therefore, *Shari'ah* signifies the path towards Allah, the creator, the path to justice, to fellow men by doing "right" and avoiding "wrong" as laid down by Allah through divine revelation and the conduct of the Prophet (SAW).

Moreover, *Shari'ah* could be interpreted to mean Islamic law which contains all those legal

injunctions for regulating the conduct of mankind regarding social, political and economic aspects like transaction of all other civil disputes as well as crimes and punishment [4]. *Shari'ah* is universal and its universality is of two types. It is universal geographically as well as in its application. This means *Shari'ah* is concerned with every Muslim irrespective of nationality and tribe and it covers social, political, economic, and religious aspect of human life [1]. It is also crucial to understand that, the universality of *Shari'ah* over every aspects of life for Muslims makes it wider than the technical definition of law. *Shari'ah* is not only a set of codified laws governing the outward conduct of Muslims. But beyond that, it is a life principle that gives a world view, a moral value and a conscience. It is the spirit that gives life to the religion of Islam and also meaning to every Muslim [5]. *Shari'ah* touches every aspect of Muslim life ranging from the rules of what he is to eat and how to eat it to the rules of how to defecate. Everything concerning Muslims is clearly defined by *Shari'ah* and it entails five sections. The sections are belief, morality, devotion, transactions and punishment [5].

For the purpose of this paper, *Shari'ah* is an all encompassing, all embracing system that permeates the social, political and economic life of the Muslims. And

in view of the centrality and crucial significance of *Shari'ah* in Islam, no Muslim can be fully practising Islam without being guided by the *Shari'ah*. This is why *Shari'ah* is an integral part of Islamic faith and one of the factors for Muslim's persistent demand for its implementation [6]. Although, the *Shari'ah* is universal and comprehensive, its applicability in a multi-religious and secular society is to those who wish it to be applied to them. Thus, *Shari'ah* courts in Nigeria aim at the transactions and punishment sections of the *Shari'ah* and are to Muslims' cases only. However, the centrality of *Shari'ah* to Muslims is worthwhile. To Muslims, compliance with the *Shari'ah* in their entire life, leads to greatness, immunity, success, morality, tolerance, accommodation and dignity. Deviating from the *Shari'ah* on the other hand leads to wickedness, intolerance, conflicts, violence and destruction. In addition, Muslims are taught how to live with others by the *Shari'ah* on the maintenance of peaceful relationships, tolerance and accommodation and the restraints on retaliation for any act of violence directed at them [7].

### The Place of *Shari'ah* in Nigerian History

*Shari'ah* in Nigeria is as old as the coming of Islam in Hausaland. Islam has been spreading throughout Hausaland since the fourteenth and fifteen centuries and it was first accepted by urban and royal families. In Borno Empire and some Hausa States like Kano and Zazzau, Islam was made state religion and *Shari'ah* began to be applied as early as fifteenth century. But in some areas like Gobir and Kabi Kingdoms, Islam was practiced but *Shari'ah* was not fully applied [8]. This non-application of the *Shari'ah* coupled with other non-Islamic activities led to the rise of Sokoto Jihadists under the leadership of Sheikh Usman bin Fodiyo against non-Islamic governance and institutions. After the Jihad movements, Islam was revived over what is today northern Nigeria and beyond, and all political institutions were characterized by Islam. An Islamic state known as the Sokoto Caliphate was established and the Islamic *Shari'ah* was fully implemented. Both civil and criminal cases were tried according to the Islamic legal system [6]. The Caliphate gave the *Shari'ah* a new outlook among the Muslims in Nigeria. It became supreme in every sphere of life including government, economy, foreign policy as well as the administration of justice and the organization of society. Perhaps, the Caliphate represents the most ambitious attempt in Islamic history, after the first two centuries of Islam, to organize state and society in accordance with the Prophetic model and in compliance with the precepts and provisions of the *Shari'ah* [9].

The application of *Shari'ah* in Nigerian areas was not restricted to Borno Empire, Hausa States and Sokoto Caliphate but extended to the Yorubaland. For instance, Oba Momodu Lamuye of Iwo implemented *Shari'ah* in his town between 1860 and 1906. Similarly,

Oba of Oyewole of Ikirun established *Shari'ah* in his domain and it was presided by *Qadi* from Ilorin. There was also *Shari'ah* in Ede, and Epe was ranked second to Ilorin in terms of Islam and *Shari'ah* implementation [2]. But with British conquest of the Nigeria and the application of indirect rule system in northern part of the country, *Shari'ah* began to be degraded and restricted to the north and to deal with only personal matters of the Muslims [10].

Furthermore, it is noteworthy that even during British colonial regime Nigerian Muslims continued to seek for the application of the *Shari'ah*. For instance, Lagos Muslim community demanded for *Shari'ah* as early as 1894 when they presented their request for the application of the *Shari'ah* from the colonial Governor in Lagos [11]. Similarly, in 1938 Ibadan Muslim community asked for the application of the *Shari'ah* [2]. The details on how colonial regime affected *Shari'ah* and replaced it with English Common Law shall be given under a separate section. However, the legal reforms of 1950s in northern Nigeria which gave birth to Penal Code neither did check the dominance of English law over the *Shari'ah* nor address the Muslims yearnings for the *Shari'ah* [12].

In the lead up to the Second Republic (1979-1983), there was vehement political conflict over integration of Islamic law within the constitutional justice system and this continued to shake the foundation of Nigeria [10]. Apparently, *Shari'ah* began to be a serious issue in Nigeria's judicial spheres in 1977 when the Constitution Drafting Committee recommended the establishment of Federal *Shari'ah* Court of Appeal. This recommendation generated nation-wide controversy. The removal of this provision from the Constitution in 1978 had created a lot of bitterness among Muslims who considered it as denial of their right to access to justice [10]. Similarly another crisis arose during 1988 constitutional revision. This time Christian members of the Constituent Assembly insisted that all references to *Shari'ah* must be removed from the new constitution. Muslim members on the other hand countered by insistence that it should rather be extended throughout the entire country. The military administration of the time intervened and limited the jurisdiction of *Shari'ah* to civil matters in which only Muslims of northern Nigeria were party [10].

Moreover, the issue of *Shari'ah* began to resurface in 2000 when Zamfara State Government extended its application to criminal aspects and eleven other states in northern Nigeria followed the same route. This integration of the *Shari'ah* into state criminal law added more kindling to an already volatile situation between Muslims and Christians in Nigeria. It was also the beginning of apparent international concern on the issue of the *Shari'ah* in Nigeria. Particularly, the death by stoning judgments meted out

to two female adulteresses received great attention of the West [13].

### Colonialism and *Shari'ah*

At the British conquest of northern emirates of Nigeria, the area had an efficient judicial system and administration of justice under the sovereignty of each emir. The British replaced the criminal aspect of the *Shari'ah* with English Common Law and reduced the jurisdiction of the former to personal matters of Muslims [14]. The sweeping changes in the *Shari'ah* that also became the root of present confusion over the implementation of the *Shari'ah* in Nigeria began in 1900 when Lord Lugard, the first Colonial Governor-General of Nigeria, issued the Protectorate Court Proclamation. The colonial officers wanted to replace the *Shari'ah* completely with English Common Law. However, they realized that the long established court system in the emirates of northern Nigeria could be adopted but with fundamental changes to be in conformity with the British colonial policies [12]. In this line, the most important components of the *Shari'ah* which are capital punishments for capital offences were abolished. The personal matters of Muslims that included marriage, divorce, inheritance, guardianship and legitimacy were to be determined by the *Shari'ah*. These changes were designed to facilitate the encroachment of the English Law upon Muslim areas and to ensure the degradation of the *Shari'ah*. Even the aspects of the *Shari'ah* that were allowed to be applied to Muslims were temporary pending the right time for complete replacement of the *Shari'ah* with Common Law [12].

The court structure established by the colonial officers after Native Court Proclamation in 1906 was contrary to the operation of the pre-colonial *Shari'ah* system. There came into existence three types of courts namely a supreme court, provincial court and a native court. The Supreme Court had nothing to do with the *Shari'ah* but the Provincial Court could apply the native law and customs among which the *Shari'ah* was included. Native Court was specifically for native laws and customs, the *Shari'ah* also inclusive. The Native Courts were also graded into A.B.C. grades and the grading was determined with varying powers at discretion of the Resident. The grade A. Native Court affairs were exercised by chief judge (*Babban Alkali*) and the Emir's Judicial Council who were empowered to hear civil and criminal cases under the supervision of the Resident. Grade B. Court on the other hand was headed by *Alkalai* (*Shari'ah* judges) in the district headquarters with jurisdiction over civil cases. Grade C. Court did not operate like conventional court but provided grassroots where Grade B. Court did not exist [12].

Moreover, the provision of Native Court Proclamation also granted enormous powers to the Residents. Such powers allowed the increase and

reduction of the powers of Native Court by colonial officers at anytime they deemed it fit. Residents sometimes coerced the *Alkalai* to tow along by taking decisions that clearly contravened the true position of the *Shari'ah*. Provincial courts replaced the Sultanate court and the Emir's court as the supreme courts of the Sokoto Caliphate and various emirates respectively. In this vein, appeals of cases were only made to the High Commissioner or Resident instead of the Sultan and Emirs. This brought about instances of unnecessary interference in the proceedings of the *Shari'ah* courts. Consequent upon that, there were some frictions between the *Alkali* and the colonial officers and finally, the colonial officers and their influence over *Alkalai* and the *Shari'ah* prevailed [12]. The colonial officers made sure that they swept away almost everything that had to do with the *Shari'ah*. They engineered draft of a constitution that made clear separation of state and religion and identified Nigeria as a secular geo-political entity [1]. However, Muslims perceived some provisions of the constitution to be Christian. For instance, recognition of Sunday as free-working day and the imposition of Gregorian calendar at the expense of Islamic calendar.

In a nutshell, British colonial officers made sure that the *Shari'ah* criminal code was replaced by their inspired Penal Code before Nigerian independence in 1960. They made the foundation of undermining the *Shari'ah* to secularized Nigerians and this also shaped the status and application of *Shari'ah* in the post-colonial Nigeria. Thus, it was the genesis of the contemporary suspicion and mistrust over the *Shari'ah* implementation that seriously affects Muslim-Christian relations and their peaceful co-existence in the country.

### Bases for Christian Suspicion and Antipathy towards the *Shari'ah*

The overriding factors for Christian suspicion and objection of the *Shari'ah* include:

#### Fear of islamization

Many Christians have shown fears of the *Shari'ah* application in Nigeria. The islamization of state which they thought will follow the implementation of the *Shari'ah* may hamper their religious belief and practice. For instance, Byang drew the attention of the Christians to the danger of the *Shari'ah* and made the Christians' fear of Islamization clear in the following quotations:

*There are only three alternatives for dealing with the non-Muslims under the Islamic legal system: (1) they must be converted; (2) they must be subjugated; (3) they must be eliminated [15].*

He said the desire to establish *Shari'ah* is just a prelude to turning Nigeria into an Islamic state.

*Their next line of demand would certainly be to insist on having Shari'ah at the Federal level. If and when that is achieved, then it will be even childish to argue that Nigeria is not an Islamic state [15].*

The argument here is that if dual judicial system is fully established at state level, then Muslims would further agitate for same at federal level. He contended that doing so is turning the country into an Islamic state, forgetting the fact that the *Shari'ah* courts are concerned with Muslims only. Byang also forgot that Muslims perceived Common Law as Christian law.

### International Concern

Concerns of the Western nations about the *Shari'ah* implementation in Nigeria is one of the bases for Christians' abhorrence of Islamic legal system. International community questions the status and respect of the rights of non-Muslim minority under the *Shari'ah*. The concern alarmed Nigerian Christians that they would be second class citizen under the *Shari'ah* [16]. The West also considers the implementation of the *Shari'ah* as violation of fundamental human rights. Western concern over the *Shari'ah* began to be very pronounced from 1999. This period witnessed the revivalism of the *Shari'ah* in some states of northern Nigeria, beginning with Zamfara State. The *Shari'ah* implementation in the State attracted correspondences from the Pope's office in Rome to Zamfara State Government. The letters challenged the State Government that why *Shari'ah* should be implemented in a state with Christian population [1]. Similarly, head of Anglican Church of England Archbishop of Canterbury, Dr. George Carey also came to Nigeria and complained why the *Shari'ah* should be implemented in Zamfara [1]. Specifically, the judgements of sentence to death by stoning against adultery in respect of Amina Lawal and Safiya Hussaini by the *Shari'ah* courts in Katsina and Sokoto States respectively attracted the attention of the West than any other thing concerning the *Shari'ah* in Nigeria [17].

### Spirit of Secularism and Disregard for the Holy Scriptures

The relationship between Islam and Christianity is a well known fact to every sound Christian that understands the teachings of the Christianity. Muslims believe that Allah promulgated the first comprehensive law through Prophet Musa (Moses) (AS) which was modified and confirmed by Prophet Isa (Jesus) (AS) when he stated that he did not come to destroy the Mosaic Law but to uphold it [18]. The Qur'an which is the primary source of the *Shari'ah* revealed through Prophet Muhammad (SAW), confirmed and endorsed Mosaic Law [2]. Most of the punishments of Islamic *Shari'ah* are also in the Bible with old and new Testaments. Sometime those punishments in the Bible are harsher than those provided by the *Shari'ah*. For instance, according to Deuteronomy 22:22 the punishment for adultery is

prescribed thus: "if a man is found with another man's wife, both the man who slept with her and the woman must die. You must purge evil from you". While the punishment for apostasy is stated also in Deuteronomy 17:2-7 thus: "if any one whether man or woman in any village violates your covenant with God by worshipping other gods, the sun, moon or stars which I have strictly forbidden, first check the rumour very carefully. If there is no doubt, it is true, then that man or woman shall be stoned to death". The punishment for murder is contained in Leviticus 24:17, which states that: "if anyone takes the life of a human being, he must be put to death". As for the punishment for theft, it is contained in the New Testament Mathew 50:30 and states: "if your right hand causes you sin (by stealing) cut off and throw it away, it is much better for you to lose one of your limbs than your whole body to go into hell" [19, 2]. Thus, non conformity with the clear cut Biblical injunctions was another disregard for religion by the Common Law. And if both Muslims and Christians obey and uphold sincerely the Holy Scriptures in their possessions and actions, suspicion and mistrust among them should not continue.

### Impact of Christian Perception of Shari'ah on Muslim-Christian Relations in Nigeria

The major problem with the inter-religious relationship is an attitude of condemning the value systems of either religion. This often generated inter-faith confrontation in Nigeria. Challenging any religious adherent using provocative words for practicing what is directed in his/her Holy Scripture is an indication of interference which consequently affects inter-religious relationship. Muslims in Nigeria perceived English legal codes operating in the country as Christian and therefore, agitate for the implementation of the *Shari'ah* to try cases concerning Muslims. They provided many grounds upon which they based their arguments that the whole system of Nigerian government favours Christianity. They did not seek for the abolition of the Common Law in Nigeria but sought their cases to be tried by the *Shari'ah*. Muslims maintain that official recognition of Sunday as free-working day, English as official language, official use of Gregorian calendar for all governmental activities and the use of Christian Cross as emblem in the government healthcare institutions, ambulances and first aid kits as well as the imposition of secularism on Nigeria among others have had English-Christian connection. Secularism as advocates by Western Christians entailed separating the spiritual from the mundane and subordinating divine laws to man-made laws [2]. It is pertinent to note that in Islam secularists are irreligious, because Islam is the total way of life. Secularists are also the representatives of Western Christian civilization because they believed in the separation of state from religion and the subordination of Allah's laws to man-made laws.



But Christians in their counter-arguments to defend English Law and oppose the *Shari'ah* implementation in Nigeria, contend that English is just a language, forgetting the fact that so Arabic is also a language but they are active antagonists of anything that has to do with Arabic. For instance, Utere says:

*Government should disengage itself from funding Islamic courts and in act special centres for Arabic and Islamic Studies, Arabic and Islamic teachers' colleges and schools [20].*

Their basis was the relationship between Arabic language, Islam and the *Shari'ah* which in every respect is similar to the relationship between English language, Christianity, and the Common Law. Christian's abhorrence of Arabic language led to the ban of teaching the language in some government established institutions; for example, Defense Academy Kaduna [1]. This also led to the neglect of some institutions of teaching Arabic language for instance; the Arabic Village at Gambarun Gala is abandoned without staff and equipment. They also agitated against the Arabic inscription on Nigeria currency and sought it should be expunged [1]. They fail to appreciate the fact that if Arabic language and inscription represents Islam, so also English language and Roman inscription represents Christianity because it was brought by Europeans who were English and Christians as well. Antagonists of Arabic inscription need to understand that there is no difference between Hausa in Roman inscription and Hausa in Arabic inscription. Now that Hausa in Arabic inscription is erased on Nigerian currency and replaced by Hausa in Roman inscription, does that mean propagating Christianity?

Muslims perceived the system of government and the operation of English Law in Nigeria as purely Christian oriented. According to Lord Sumner:

*Ours is and always has been, a Christian State. The English family is built on Christian ideas, and if the national religion is not Christian there is none. English law may well be called a Christian [21].*

Thus, the institutionalization of English Law in the Nigerian legal system and its enforcement over all societies and sections of Nigeria since colonial period served as the reason why Christians viewed the *Shari'ah* as not part of the Nigerian legal system. The *Shari'ah* legal system has been in operation in the predominantly Muslim north for centuries before the British occupation and the introduction of English Law in the area. With regard to the misconception that, the *Shari'ah* is not part of public and state system, Byang has this to say:

*It is a fact that the Grand Khadis (Qadis) and the Khadis of the Shari'ah courts do nothing worthy of the remunerations that they enjoy from the public coffers.*

*They enjoyed the same salary as learned Chief Judges of states! It is bad enough that these Shari'ah judges are paid from the public funds... [15].*

The above statement in the perception of Muslims was extreme disregard of their history and religion. Such other statements by Byang, Utere and other Christian leaders that cannot be contained within the scope of this paper had negative impacts on the Muslim-Christian relations and peaceful co-existence in Nigeria. It is noteworthy that both Nigerian Muslims and Christians have constitutional rights to benefit from the public funds, right to worship and religious obligations. Similarly, it is enshrined by Nigerian constitution that there shall be for any state that requires it a *Shari'ah* court [22]. What most Muslims expected of their Christian counterparts was to agitate for the establishment of ecclesiastical courts, if they are really different from the Common Law courts. This could have been simple because they have constitutional rights to practice Christianity and benefit from public funds as well. The application of the *Shari'ah* will only be to those subject to it and therefore, Muslims see no reason why Christians oppose a system that does not affect.

The Christians' perception of the *Shari'ah* made Muslims to consider their fellow countrymen as biased and intolerant. Christians on their side consider Muslims as subjective and selfish. Consequently, there were many *Shari'ah* related violence especially after the adaption of criminal aspect of the *Shari'ah* by some northern states in Nigeria. Some of such crises are Kaduna and Kano crises of February 2001, Gombe crisis of May, 2001, Bauchi crisis of 2001, Borno and Jigawa crises of 2001 and Kaduna riots of 2002 [10].

## CONCLUSION

In the history of Nigeria, *Shari'ah* Islamic Law was the only legal system before the British final occupation of the area in 1903. Since the occupation, English Common Law and practices were introduced in the country. The emergence of the dual or plural legal systems brought the rise of support for or against of either the *Shari'ah* or the English common Law in the scene of Nigerian politics and national discourse. It was the different opinions between Muslims and Christians with the reference to the possibility of continuity with the *Shari'ah* in civil cases as conducted by the colonial state before 1960 or extending it to criminal spheres as the case with the post-1999 *Shari'ah* in northern Nigeria. The paper realized that the debate and specifically condemnation from Christians to the rise of the *Shari'ah* contributed adversely to the Muslim-Christian relations in the country as experienced in 1970s, 1980s and above all in 1999 – 2002. Thus, tolerance from all adherents of Islam and Christianity is the best way in the inter-religious relations in Nigeria, and elsewhere in the world.

## REFERENCES

1. Ibn Usman, M. (2007). "Tarihin Shari'ah a Najeriya, Bambamcin Shari'ah da Dimukuradiya da Kuma Shari'ah ta Tsallake Bododin Zamfara" A Lecture Delivered at a Conference on Shari'ah beyond Zamfara State, in Gusau, Zamfara State.
2. Ibrahim, A. (2000). *Shari'ah and the Press in Nigeria: Islam versus Western Christian Civilization*. Kurawa Holding Limited, Kano: Nigeria.
3. Holy Qur'an chapters: 5 and 45.
4. Mahmud, A. B. (1988). A brief history of Shari'ah in the defunct Northern Nigeria.
5. Maududi, A. (1960). *Islamic Law and Constitution*, Islamic Publications: Lahore (Pakistan).
6. Bunza, M. U. (2008). "Shari'a in the History and Political Development of Nigeria". in J.O. Adekunle (ed.), *Religion in Politics: the Quest for Peace and Stability in Modern Nigeria*. Africa World Press.
7. Maishanu, I. M. (2014). 'Islamic Principle of Moderation and the Culture of Peaceful Co-existence', in A. S. Mikailu, M. U. Bunza and I. S. Maishanu (eds.), *Islam and the Fundamentals of Peaceful Co-existence in Nigeria*. Sokoto State Government.
8. Uthman, I. W., & Gharavi, A. E. (2002, February). Viral infections and antiphospholipid antibodies. In *Seminars in arthritis and rheumatism* (Vol. 31, No. 4, pp. 256-263). WB Saunders.
9. Ibrahim, R. A. (1987). Structural dynamics with parameter uncertainties. *Applied Mechanics Reviews*, 40(3), 309-328.
10. Miles, W. F. S. (1998). "Shari'a as De-Africanization; Evidence from Hausaland". *Africa Today*.
11. Raifu, I. O. (2016). Intrigues and Twist in the Imamate Crisis of Lagos Central Mosque (Jama'atul Muslimeen Council), 1841 to 1947. *AFRREV IJAH: An International Journal of Arts and Humanities*, 5(4), 36-48.
12. Usman, M. T. (2006). "The Ulama ('Ulama) and Administration of Justice in Colonial Northern Nigeria: A Case Study of Sokoto Province". *Hamdard Islamicus, Quarterly Journal of Studies and Research in Islam*. Bait al-Hikmah at Madinat al-Hikmah.
13. Badamasiyu, J. (2011). "Shari'ah Implementation in a Democratic Nigeria: Historical Background and the Quest for Developmental Legality". *Journal of Politics and Law*, 4(2).
14. Yakubu, A. M., Kani, A. M., & Junaid, M. I. (eds.). (2001). *Understanding Shari'ah in Nigeria*, Abuja: Spectrum.
15. Byang, D. (1988). *Shari'a in Nigeria: A Christian Perspective*, Challenge Publications: Nigeria.
16. Esposito, J. C. (1994). "The Threat of Islam: Myth or Reality". in H. Kung and J. Moltmann, (eds.), *Islam: A Challenge for Christianity*, SCM Press: London.
17. Phillip, O. (2000). *Shari'ah Implementation in Northern Nigeria, 1999-2006*. A Sourcebook. Vol. 5.
18. Holy Bible: Mathew, 5:17.
19. Saleh, T. R. (2000). "Shari'ah in the Bible" *Weekly Trust*.
20. Utere, S. U. (1986). *New Nigerian*, Kaduna. Nigeria.
21. Bowman Vs. Secular Society, (1917). A case tried in England in 1917.
22. Nigerian Constitution of 1979: Section 35(1) and Section 240(1).