

Mastering the Niger therefore reveals as never before how knowledge production in the Atlantic world had always been a function of imperial power and imperial claims to further that power. In the end, what mattered to both abolitionists and proslavery propagandists was the means of the advancement of the British Empire, and the instrumental potential of scientific knowledge to achieve that end. This was how the proslavery sympathies of a geographer like MacQueen came to influence the “humanitarian” ideal, which underwrote the scramble for Africa, and the production of another chapter in the history of forced African labor.

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BONNY IBHAWOH. *Imperial Justice: Africans in Empire's Court*. New York: Oxford University Press, 2013. Pp. x, 211. \$90.00.

Administrators of the British Empire lived with a tension between racial distinctions and the universalist premises of British ideals. Nowhere was this tension more persistent than in the empire's courts of law. Imperial law was continually pulled between a localism, whose flexibility gave room for tolerance of native culture and, also, European racism, and a universalism which conversely constrained both. Bonny Ibhawoh has written a most valuable study of how such tensions expressed themselves in the twentieth century through the workings of the two appeals courts for colonial Africa and the Judicial Committee of the Privy Council (JCPC). The JCPC has been neglected by historians, in part because of the difficulty of using its archives, until very recently inconveniently housed in the basement of the former home of the JCPC at Number 9 Downing Street. Yet as the empire's highest “court,” it played a key role in shaping imperial justice. Closely examining the Privy Council's archives along with those of the East African and West African Courts of Appeal, Ibhawoh describes how some nonwhite subjects were able to use these courts to challenge imperial inequities, and how the legal universalism represented by the JCPC conflicted with both the pragmatism and the racism of local magistrates and other Europeans. A single legal universe for all the king's subjects or a flexible legal “multiverse,” adapted to local circumstances and racial hierarchies? This question, never resolved, underlay much activity in these courts.

Beginning with the problem of the place of African customary law, especially the charged subjects of “medicine murders” and “blood money,” and moving on to land litigation, Ibhawoh shows how the localist-universalist tension repeatedly structured the appeals proceedings and outcomes. The “doctrine of repugnancy” (p. 55) was increasingly drawn upon to limit local variations in legal procedure and substance, whether stemming from native custom or local administrative convenience, and thus kept the empire unified. Legal “centralizers” in Westminster were forced again and again through the consideration of specific cases to concede

more to the demands of necessary “flexibility” than they would have liked. Influential precedents on criminal law and on indigenous land rights were set in order to constrain both local administrators and white settlers, while calls for others that might seriously threaten social and political order were, for the most part, denied. In *Amodu Tijani v. Secretary of Southern Nigeria* (1921), for example, the JCPC granted the appeal of a native chief and greatly upset local administrators by laying down the principle that native land rights pre-dating colonization had to be recognized by British authorities. This case was then cited as a precedent on several occasions, including the well-known 1988 *Mabo* decision of the High Court of Australia recognizing Aboriginal land title. In *Mahlikili Dhalamini and Ors v. the King* (1942) the JCPC overruled local officials in Swaziland who had dispensed with statutory requirements for the use of native assessors in criminal trials because they feared such assessors could not be independent, thus allowing a judge to rule alone. On the whole, the members of the JCPC followed a liberal course, neither backstopping colonial rule nor seriously endangering it. At the same time, these appeal deliberations afforded a surprising amount of space for native initiative to challenge local agents of authority and to advance their own professional, economic, and political interests. These courts may have been from one angle mere safety valves of empire, but they seem, in Ibhawoh's accounting, to have provided some real substance to the promises of a “rule of law.”

Though it is not his central purpose, Ibhawoh also provides a succinct account of the rise and fall of the JCPC. Much of the empire by the late nineteenth century wanted some central and professional body for appeals; this was replaced, however, by the colonial nationalism of the twentieth century, which gave rise to demands to restrict the right of appeal beyond self-governing colonies and newly independent states. Thus, the lifespan of the JCPC was not long, but, as Ibhawoh shows, during its effective life it was more important for imperial history than has been appreciated.

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RANDY J. SPARKS. *Where the Negroes Are Masters: An African Port in the Era of the Slave Trade*. Cambridge, Mass.: Harvard University Press, 2014. Pp. 309. \$29.95.

Randy J. Sparks's study of a little-known port on the West African coast is an eloquent narrative history about unexpected connections in the Atlantic world. The story of Annamaboe (Anomabo), located in modern-day Ghana, is not a simple story of “triangular trade” between Europe, Africa, and the Americas during the eighteenth century. Instead, Sparks weaves a complex web of connections between Annamaboe and places as varied as London, England; Newport, Rhode Island; Paris, France; Kingston, Jamaica; and Charleston, South Carolina. Sparks then links these bustling, international port cities and metropolitan centers