

The Circuit Courts of South Africa: An Analysis of Justice

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Introduction

Since South Africa's colonization in the seventeenth century, friction was an apparent part of daily life, which only escalated further after the introduction of slavery. These tensions grew out of a growing notion of superiority the Dutch and British felt over both the native Khoi population of South Africa and the slaves they brought in from Masahisa, Madagascar, and the East African coast. Laws were continually passed in Cape Town that helped regulate the forced labor of both of these groups. Eventually, sympathy was given over the harsh treatment and subjugation of them, especially the Khoi, as all their rights had been stripped away by the colonizers. This, among other reasons, then led to the creation of the South African circuit courts, a judicial system that would travel around to the various towns and hear complaints of abuse, mistreatment, subjugation, and other offenses. However, despite the court's good intentions, the underlying motivation behind these courts remains up for debate, as well as their effectiveness in protecting the rights of the Khoi and those enslaved. Therefore, an analysis over the effectiveness of the circuit courts will reveal how they actually provided justice to the populations of South Africa and their effects over the growing race relations.

Background

Located at the southern tip of the continent of Africa, the Cape had become a primary stopping point for ships headed to the East Indies. This port was used by the Portuguese, Dutch, and British, with the Dutch East India Company (VOC) eventually establishing

a permit refueling station due to an increase number of ships utilizing this route. While not initially intending on turning this station into a permanent settlement, it nevertheless developed into a small colony. Almost immediately, Jan Van Riebeeck, who was the Commander of the settlement, began writing letters to VOC shareholders in 1652, requesting slaves to be brought in to help with the labor. This request was denied twice, leaving Van Riebeeck frustrated.¹ After their initial landing in the Cape, the Dutch frequently traded with the indigenous population of the Khoi. They were a semi-nomadic cattle herding group, which was organized by lineage and clans. Van Riebeeck saw them as an extremely valuable resource, both for their economic stability through trading, but also as a possible labor force. The Khoi refused to do this labor willingly and Van Riebeeck was denied a request to enslave them from the VOC.² This left the new colony in a strained position, as the demand for resources continued to increase, while a lack of labor was growing progressively more evident.

Following this, a severe food shortage developed in the Cape around 1654. Van Riebeeck therefore decided to ignore his orders and sent out ships to buy rice and slaves from Madagascar.³ From this point on, slaves were continually brought into the colony, setting the precedent for labor. Meanwhile, the Khoi were growing increasingly displeased with the European settlement and expansion into South Africa, prompting them to undersupply Van Riebeeck with meat and other goods. Throughout the following years, the Khoi lost majority of their cattle as a result of unfair trade with the Dutch, ultimately forcing them

to seek employment with the Dutch to earn back their animals. The lines between slaves and Khoi began blurring and the Khoi were rarely paid. Additionally, while technically considered a “free person”, the Khoi were subjected to restrictions not applied to the European colonizers or other people defined under this title.⁴ The restrictions and laws placed upon the Khoi were greatly increased after the British took over control of the Cape. In 1809, the British passed a series of laws meant to regulate the Khoi. Most notably was the introduction of passes along with the requirement of a fixed residence. These combined became the nail in the coffin for the Khoi’s hope of freedom and returning to their original way of life. Both the Khoi and the slaves brought into the Cape were forced to endure some of the most strict and brutal treatment of slave colonies during this time, eventually causing a small outcry to try and improve these conditions.

The Circuit Courts

The harsh treatment the Khoi were subjected to, along with the increased restrictions being placed over them gathered sympathy from John Philip, who was part of the London Missionary Society. He lobbied the British government. In 1811, the first circuit court in the Cape was established by a proclamation issued by the Earl of Caledon.⁵ This circuit court heard both civil and criminal trials and would travel around the colony, providing its services to all the regions of South Africa. A second circuit court was established in 1812 and was commonly referred to as the “black circuit”, due to it dealing with a large portion of charges regarding the mistreatment of the Khoi.⁶ Both of these courts heard a total of around 750 court cases from 1811-1825. Beyond Philips lobbying to the British government regarding the Khois mistreatment, these courts were set up due to three principal factors:

The first was that the administration of justice in the country districts was clumsy, unsatisfactory and very inconvenient for the inhabitants of the outlying districts. The second was that the highest court, the Council of Justice, was overloaded with work, which caused delays in the administration of justice. The third was that the Hottentot Proclamation of 1809 was deficient in that there was no impartial authority to see to the proper enforcement of its provisions. This was underlined by the frequent allegations

of maltreatment made by missionaries, and the circuit court was seen as an appropriate mechanism to investigate and adjudicate upon the charges.⁷

Together, these factors resulted in the two circuit courts being set up and served to provide justice to the European, Boer, Khoi, and slave populations.

This court system was later reformed under the Charter of Justice, which had begun developing in 1827 and was later passed in 1828. These reforms came out of the British distaste of the administration of justice provided by the first two circuit courts of 1811 and 1812, and in turn reshaped them closer to British standards.⁸ Some of the changes made included dividing the colony into three districts, and therefore establishing three separate circuits: the Western circuit, the Midland circuit, and the Eastern circuit. These circuits did not run at the same time as one another and would last for two to three months each.⁹ Additionally, for criminal trials a jury of nine was required, six members being allowed if nine could not be assembled, however, civil suits and actions were to be done only by the circuit judge and without a jury.¹⁰ Ordinance 50 was also created during this time which repealed early proclamations and restored many of the Khois rights. This included the right to own property, equal protection under the law, and regarded them as having “absolute equality with the white colonists.”¹¹ This may have come about due to a honest push for native rights or as a way to shift oppression of masters to a systematic oppression by colonial order, therefore giving the British more power over the Afrikaners.¹² Nevertheless, with the new court system in place and the Khois status redefined, the circuit courts set out on there routs throughout South Africa.

As previously established, travel was a primary aspect of this court system. However, the conditions of South Africa’s roads in the early to mid-nineteenth century were particularly horrendous. One of the circuit judges went as far as stating that the roads were “in an execrable state, quite a disgrace to any civilized society.”¹³ Accidents were frequent during travel and the roads themselves were nothing more than pathways carved out in the dirt by carts and wagons driven by ox and horses. Additionally, the speed of travel was very slow, ranging from 2.5-6 miles per hour.¹⁴ The terrain of South Africa also proved to be a formidable force, as mountains and rivers significantly prolonged the

trips between towns.¹⁵ This all prohibited the courts from functioning as effectively as they could, as travel throughout the districts proved to be extremely time consuming and, in many cases, dangerous. Likewise, this inconvenience also meant that the speed at which justice could be delivered was often delayed, and in some instances, problems may have gone unaddressed due to the long absences the courts had throughout the rotation of their circuits.

Along with travel, the language used in the courts also proved to be an issue. As the population was diverse in the Cape, so was the range of languages used, causing translators to often be required in the courts. In some cases, “double interpretation was required: one interpreter would translate from isiXhosa to English, and a second from English to Dutch.”¹⁶ Attempts had been made prior to the Charter of Justice reform between 1827 and 1828 to make English the official language of the court, however, these attempts were postponed till after the first day of January 1827.¹⁷ Following this proclamation of an official language, many jurors were dismissed due to a lack of sufficient knowledge over English. In cases where there were not enough English-speaking jurors, the trial was denied, and the case was therefore thrown out.¹⁸ This inherently caused bias towards non-English speakers and may have also effectively dismissed a higher number of cases in areas that had a larger majority of Boers, slaves, and Khoi. Language, just like travel, hindered these courts’ effectiveness in providing adequate justice to South Africa and especially the populations under already prevalent discrimination and subjugation.

The circuit courts, as previously established, were intended to benefit and bring justice to all the populations living in the Cape, which included those enslaved and the native Khoi. The inclusion of these two groups inherently led to some resentment from many Europeans and Afrikaners. Similar to the Khoi, despite a declaration being made that slaves “had a share in the laws of nature”, to effectively end their legal status as non-persons prior to 1813.¹⁹ Despite this notion, they still lacked many other rights that would truly equate them to that of the white population. Slaveowners by law were allowed to punish slaves for “domestic offences” and slaves were also given the right to lodge a complaint when they felt this punishment was unnecessary.²⁰ Many of the white frontiersmen saw the courts as overstepping their bounds for allowing these cases to be heard and for them to therefore be put

on trial. They viewed their punishments as matters of discipline and not the matter of the law, seeing it on equal footing as disciplining a child. These punishments would be quick in comparison to the drawn-out trials of the court, which would be conducted by a foreign judge.²¹ These factors combined led to strong negative feelings the Boers expressed in regard to the circuit courts.

In some cases, complaints logged by Khoi or slaves were thrown out if they were deemed unfounded. This effectively prevented them from ever even making to the court.²² While the ability to seek justice for themselves gave them some liberation, it also had the potential to make matters worse at home if their master found out they tried to take them to court. To get around possible flogging or other punishments, the Khoi and slaves would turn to their master’s neighbors. From there, they could help direct them to the law or act on their behalf.²³ The aspect of community as a whole became very important within the court system. Reputation was a critical element within South Africa’s communities and played a role in determining the outcomes in court. A slaveholder who had a reputation of being violent with their slaves would be more likely convicted in court than that of a slave owner with a good name and positive reputation.²⁴ This had the potential to let a slaveholder off the hook for their first instance of ill-treatment if they were known around the community to be a respectful owner. This therefore allowed bias and other outside factors to affect the court’s rulings and the justice they provided, beyond the circumstances of the case itself.

Effectiveness of the Courts

Despite each of the circuit courts and their individual cases throughout the years all involving different situations, an analysis over a handful of trials will articulate in general how justice was provided to the residents of South Africa. The first case that will be looked at is one regarding an instance of ill-treatment between a slave named Adam and his master Philippus Johs. Van der Byl which was reported on February 3, 1827.²⁵ The court’s Assistant Guardian reportedly advised Adam not to proceed with the trial, as he believed his complaint was not substantial enough for the court to favor him. However, Adam persisted and three days later the case was heard, followed by Adam then withdrawing his charge and “begged his master’s

pardon, which was granted to him.”²⁶ This instance displays the paradoxical situation many slaves are put in through the judiciary system. Adam was able to have a second opinion by someone who held status within the court system, but despite this advice, he persisted and may have reaped more consequences as a result. The circuit court system presented the opportunity for justice, but in Adams case he lacked strong enough evidence to win. Even though he withdrew and was granted a pardon, the court stopped its justice after those on trial leave the building, indicating there is no proof that this indeed occurred, and Adam was not additionally punished by his master. In this instance, other factors may have been present and not recorded in the record, which leaves it up for interpretation whether there was outside pressure on Adam to drop the case or if he had simply accepted the fact the court would not provide justice in his favor and saw his withdraw as the safer option.

A common case brought to court by slaves involved illegal detainment and subsequent enslavement. One instance of this can be seen in a report between Apollos of Ryno Mellet and Van Helsland on September 26, 1826.²⁷ Apollo brought Van Helsland to court stating that he was a captain’s servant on a ship heading from India to the Isle of France and after being seized by a King’s ship he was brought to the Cape and then sold as a slave by Van Helsland. Following this Van Helsland stated that Apollos had been brought to India in 1779 as a prisoner and that he decided to sell him at the Cape as punishment for stealing a sum of money. He continued that Apollos had attempted multiple times before to earn his freedom in court, however, this case was not ultimately brought forward as there lacked any significant evidence to support Apollos claims.²⁸ In this instance, Apollos complaint over his illegal detainment did not have a sufficient foundation and did not deny Van Helslands claims over how he became his captain’s servant originally. While this report does not include enough information to gather any inkling of bias, it is safe to assume that Van Helslands statement did hold some truth and Apollos clear lack of evidence further points to this being a fair judgement. Additionally, no note was made regarding Apollo’s punishment for an insufficient claim, indicating that no additional harm came out of the dismissal of this case from a further trial beside Apollo’s continued status as slave.

In comparison, another instance of a slave being

illegally detained can be seen through a case regarding a woman who entered the colony as a free person, but later forcibly lost this status. This complaint was lodged by Lucy of Petrus Michiel Brink stating that she arrived to the colony in 1790 from Madras with Widow Smit [Mrs. Peters] as a free person. Following Smits marriage to Mr. Klaas Peters and later passing, she was “carried into his service, and was afterwards sold on his account by the sequestrator.”²⁹ The Guardian residing over this case procured an inventory record taken on June 20, 1793, which was taken following Mrs. Peters death and did not include Lucy’s name. If her original statement was correct regarding how she entered the service of Mr. Peters, this evidence therefore supports her claims and the Guardian believed she had very a favorable chance of winning her case.³⁰ There is no continued record regarding the outcomes of this trial, however, given the statement above, there is indication that Lucy was able to sufficiently support her claim and be given back her status as a free person. This report is also noteworthy as it displays that the courts did not try and prohibit the slaves rights to means of evidence to further support their claims. Moreover, they gave them the same rights and protocol as that for a free person and in this case even actively sought out evidence on their behalf to use in their defense. This then supports the notion that these courts did indeed seek justice for all parties regardless of status.

Another instance regarding freedom can be displayed in a dispute regarding the status of a child born between a slave and her master. This case occurred on October 18, 1826 in which Leentje lodged a complaint that her master Hendrik Greeff registered their child, Sina, as a slave and denied his affiliation as their father.³¹ Unlike the previous two cases, this case reported having evidence that Greeff was indeed the father, with “two witnesses having declared positively that they were employed by said Greeff to persuade complainant [Leentje] to submit to his desires, under a promise of freedom, and a third witness having stated that she was often accustomed to sleep in her master’s room.”³² With this prevalent evidence and witness testimony, the Guardian remarked that Leentje and her child had a very high chance of obtaining their freedom without having to “recourse to legal measures.”³³ While no follow up to this case was recorded in the Cape’s records, similarly to the case addressed above, this statement suggested that they did indeed later win the case and were granted their new status as a freed person.

Along with this, the case also displays another instance where slaves were indeed able to use their rights to use resources such as witnesses to support their claims. Overall, this trial is relatively clear cut in the evidence presented matching the outcome ruled on by the court.

Violence between masters and slaves was another prominent issue seen in cases brought to the circuit courts. A notable instance of this occurred in October of 1837 between Roelof Petrus Johannes Campher and his apprentice Dina, whom he ruthlessly whipped to the point of drawing blood. This case was not a matter of whether the whipping occurred, but rather the events that incited it.³⁴ Dina made a claim that Campher had questioned her on why she had stopped loading dung onto a cart, which she replied by stating the cart would be too full and tip over and she was waiting for the next one to arrive to continue her work. This reasoning along with leaning on her spade to rest upset Campher, who then struck her twice with an ox-strap on the shoulder. Following this, Dina ran off to Mrs. Campher, Roelof's mother, but was then retrieved by another apprentice and brought back Campher who tied her to a ladder, ripped off her clothes, mercilessly whipped her, and then sent her back to continue loading the cart.³⁵ The court then questioned her regarding the intensity of their verbal clash which she insisted she had shown no disrespect in the typical gestures of a "look [,] sigh or shrug" that would have provoked violence from a superior.³⁶ Dina understood that these would typically cause for disciplinary action from a master and insisted upon her actions not equating to this, which her witness confirmed.

It should be noted that the aspect of paternalism and world view did shape Dina's later remarks regarding this event. Dina viewed her place as subservient to Campher, who in turn had the right to discipline her if she disobeyed his order, however, she saw this instant as not being enough to incite this kind of violence.³⁷ Rather than fighting the system of slavery and apprenticeship as a whole, she instead retreated to her place and judged her situation based upon it and inherently downplayed some events. Campher defended himself in stating that he was a "good master who had finally been pushed too far by obstinate and habitually impudent servant. He was sorry and perhaps ashamed to have been goaded into violence, but Dina's conduct had incited his justifiable anger," a factor that may also have been skewed from his own paternalistic viewpoint.³⁸ If this statement was true, Campher may have been able to

gain some say in court to allow this instance to slide as it was his first act of violence and carried a good reputation prior to this trial. However, feeling this trial losing its favor towards him and the high price that would come with a guilty ruling, Campher chose to end Dina's apprenticeship thirteen months early, effectively freeing her.³⁹ Had the trial continued it is likely that Dina had formulated a strong enough defense to have won against Campher. The element of paternalism and worldview are additionally important, as this case highlighted how bias can shape the perception of an event from both the master and the slaves perspective.

Sexual violence was another prominent occurrence addressed in court, as displayed through one instance between a Khoi woman and an Afrikaner Khoi hawker. This event occurred in 1836, in which Anna, a Khoi servant, who after being sent out to collect wood, was forcefully taken behind a bush by Dienaar de Vries. He told her that he wanted to have a "connection" with her, which she immediately refused stating she had a husband and a young child at home, along with the fact that it would make her mistress angry at her.⁴⁰ De Vries then took her into a threshing room, where he threatened to hit her with a brick and attempted to rape her but was stopped after a laborer entered into the room. Throughout Anna's testimony she used rhetoric strategies "to acquire status not as a mute, colonized object, but as a voiced individual with a socially condoned moral ... life."⁴¹ This was a similar method as seen in the case above with Dina, who also strategically chose her wording to maintain a strong defense and to portray herself as innocent and not inciting these crimes. Anna additionally, used her "special status" as a married woman and one who did not conform to typical Khoi stereotypes as a way to gain added respect and sympathy from the court.⁴² Despite this attempt, de Vries was acquitted. This may have been for a variety of reasons, possibly a lack of evidence to support Anna or de Vries reputation within the community adding extra bias. Regardless however, this instant, if Anna's claim was to be correct, did not serve justice to the correct party.

Another form of violence seen in the circuit courts were in conjunction with rebellions and slave revolts. One of the most famous rebellions was the Slachter's Nek Rebellion of 1815. These events transpired following the death of Frederik

Bezuidenhout, who resisted arrest and was later shot by authorities attempting to retrieve him for missing his court appearance regarding repeated allegations over his mistreatment of one of his Khoi laborer's.⁴³ His death then resulted in an uprising against British colonial power and their hostility against Afrikaner farmers, which was organized by Bezuidenhout's brother, Hans Bezuidenhout, and his neighbor Hendrik Prinsloo. Those in the rebellion eventually surrendered to British forces and Hans, like his brother, was also shot while resisting arrest.⁴⁴ The punishments for the rebels included acquittal, imprisonment, banishment, and six were sentenced to be hung.⁴⁵ One of these six was then pardoned by the Governor, Lord Charles Somerset, and the rest, including Hendrik Prinsloo were hung. The rebels who surrendered early on were given more lax punishment, while those who persisted in their fight longer before eventually surrendering received much harsher sentences. This may have been influenced by the lack of support these actions had by other frontier Boer, as well as the British's own bias towards the Boers. Nonetheless, the rebellion was effectively stopped and those who incited and perpetuated it did receive a punishment based upon the degree at which they were guilty, thereby discouraging any indication of bias in letting this insurrection go without impunity.

Along with this, a notable slave revolt made it to the courts in 1825. The Galant slave uprising was orchestrated by a slave named Galant van der Caab, twelve other slaves and Khoisan laborers in the Koue Bokkeveld.⁴⁶ Galant had been severely beaten by his master and sent to prison for discipline. He had tried to take his master to court three times, however, the authorities never took further action. This in combination with the 1823 proclamation from Governor Somerset announcing the amelioration of slavery, which Galant and his companions mistook for emancipation, ultimately sparked this revolt.⁴⁷ This resulted in the murder of Galant's master and two other whites. The slaves fled into the mountains, but were later caught by a Cape Town commando, where they were then "tried and convicted of murder resulting in the execution of Galant and two others."⁴⁸ Similar to the case above, those who participated in the revolt and were found guilty did receive punishment suitable for the crimes committed. It should be noted that there was no mention regarding the punishment for the rest of the slaves and Khoisan's captured. This revolt as a

whole, however, could have been avoided if justice had been delivered originally regarding Galant's ill-treatment from his master.

Despite the differing outcomes throughout the circuit courts cases dealing with freedom, detainment, and violence, they all point to a general sense of honest justice present throughout the South African court systems, especially in regard to Khoi and slave trials. Similar to modern courts, the aspect of evidence played a major part in determining whether or not a case would be heard, as well as if the defendant would be found guilty. As expressed in the cases analyzed above, if proper evidence could be displayed, the enslaved person who made the claim often was able to successfully win. Moreover, the court did not actively work against them, but in some instances help procure evidence themselves to help bring adequate justice. While these examples are only as small representation of the thousands of cases over the years the circuit courts ruled over, nevertheless there is a general trend pointing to the larger presence of impartiality the judges expressed over these trials.

Conclusion

The circuit courts, at their core, were a way to try and improve the lives of those living in South Africa, but especially those often ignored within the society. The courts themselves inherently failed at being present for the needs of all its residents, as travel heavily impacted their availability. British changes to the court system both improved the status and protection of the Khoi, as well as increased colonial influence. This was later expressed through the mandate of making English the official language of the courts, which ultimately led to some increased bias. Throughout the trials themselves, paternalism and reputation did affect the jurors and defendants views over how justice should be served, however, the importance of evidence did significantly help maintain fair rulings. While the Khoi and those enslaved within South Africa were rarely given a chance to improve their ill-fated lives, the circuit courts did, however, provide an opportunity that could lead to genuine justice.

Endnotes

¹ "The Early Cape Slave Trade," South African History Online, accessed May 5, 2021, <https://www.sahistory.org.za/article/early-cape-slave-trade>.

- ² Ibid.
- ³ Ibid.
- ⁴ V.C. Malherbe, "COLONIAL JUSTICE AND THE KHOISAN IN THE IMMEDIATE AFTERMATH OF ORDINANCE 50 OF 1828: DENOUEMENT AT UITENHAGE," *Kronos*, no. 24, (November 1997), 77.
- ⁵ HJ. Erasmus, "Circuit courts in the Cape Colony during the nineteenth century: hazards and achievements." vol. 19, no. 2, *Fundamina* (Pretoria), February, 2013. http://www.scielo.org.za/scielo.php?script=sci_arttext&pid=S1021-545X2013000200005&lng=en&tlng=en.
- ⁶ Ibid.
- ⁷ Erasmus, "Circuit courts in the Cape Colony."
- ⁸ Ibid.
- ⁹ Ibid.
- ¹⁰ Ibid.
- ¹¹ Malherbe, "COLONIAL JUSTICE," 77-78.
- ¹² Lauren Benton, "Colonial Law and Cultural Difference: Jurisdictional Politics and the Formation of the Colonial State," *Comparative Studies in Society and History* 41, no. 3, (July 1999), 581.
- ¹³ Erasmus, "Circuit courts in the Cape Colony."
- ¹⁴ Ibid.
- ¹⁵ Ibid.
- ¹⁶ Ibid.
- ¹⁷ *Select Constitutional Documents Illustrating South African History, 1795-1910*, (United Kingdom: G. Routledge & sons, limited, 1918), 107.
- ¹⁸ Erasmus, "Circuit courts in the Cape Colony."
- ¹⁹ Nigel Worden and Clifton C. Crai, *Breaking the Chains: Slavery and Its Legacy in the Nineteenth Century Cape Colony* (Indiana University Press, 2000), 29.
- ²⁰ Ibid.
- ²¹ Albie Sachs, *Justice in South Africa* (Berkeley: University of California Press, 1973), 40-41.
- ²² Worden and Crai, *Breaking the Chains*, 29.
- ²³ Ibid., 36-37.
- ²⁴ Ibid.
- ²⁵ George McCall Theal, *Records of the Cape Colony: June-Aug. 1827* (United Kingdom, Government of the Cape Colony, 1905), 124.
- ²⁶ Ibid.
- ²⁷ George McCall Theal, *Records of the Cape Colony: Jan-Feb. 1827* (United Kingdom: Government of the Cape Colony, 1905), 64.
- ²⁸ Theal, *Records of the Cape Colony: Jan-Feb. 1827*, 64.
- ²⁹ Ibid., 61.
- ³⁰ Theal, *Records of the Cape Colony: Jan-Feb. 1827*, 61.
- ³¹ Ibid., 67.

- ³² Ibid.
- ³³ Ibid.
- ³⁴ Worden and Crai, *Breaking the Chains*, 45-46.
- ³⁵ Ibid., 48-49.
- ³⁶ Ibid., 50.
- ³⁷ Worden and Crai, *Breaking the Chains*, 51.
- ³⁸ Ibid., 52.
- ³⁹ Ibid.
- ⁴⁰ Pamela Scully, "Rape, Race, and Colonial Culture: The Sexual Politics of Identity in the Nineteenth-Century Cape Colony, South Africa," *The American Historical Review* 100, no. 2, (April 1995), 350-351.
- ⁴¹ Scully, "Rape, Race, and Colonial Culture," 351.
- ⁴² Ibid., 351-352.
- ⁴³ "The Slachter's Nek Rebellion," Somerset East, accessed May 7, 2021, https://www.somerset-east.co.za/page/slachters_nek_rebellion.
- ⁴⁴ Ibid.
- ⁴⁵ Somerset East, "The Slachter's Nek Rebellion."
- ⁴⁶ "Slave Resistance." South African History Online. Accessed May 7, 2021. <https://www.sahistory.org.za/article/slaveresistance#:~:text=In%201825%20a%20slave%20named,fleeing%20into%20the%20surrounding%20mountains>.
- ⁴⁷ Ibid.
- ⁴⁸ Ibid.

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