



CASE ASSIGNMENT IN KISAFWA: A GOVERNMENT AND BINDING PERSPECTIVE

Hapyness Ainade¹, Lea Mpobela², and Kulikoyela Kanlwanda Kahigi³.

¹Department of Languages and Linguistics, St. Augustine University of Tanzania.

Email: ainadeness@gmail.com

²Department of Languages and Linguistics, St. Augustine University of Tanzania.

Email: rafikilea@yahoo.co.uk

³Department of Languages and Linguistics, St. Augustine University of Tanzania.

Email: rafikilea@yahoo.co.uk

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ABSTRACT: *This paper focuses on Case assignment in Kisafwa, a Bantu language spoken in the Mbeya region in southwestern Tanzania, including Mbeya Urban, Mbeya Rural, and Chunya districts. The study drew inspiration from Government and Binding (GB) theory, focusing on types of cases in Kisafwa, how Kisafwa NPs receive case and how cases are assigned to the unaccusative constructions and infinitive clauses. It employed a qualitative research approach to explore complex data, to gain insights into people's experiences of case assignment in Kisafwa. Convenience sampling techniques were used to select informants. The sample of 5 native speakers was selected, and data were collected through sentence questionnaires and semi-controlled elicitation. The data were analysed descriptively using thematic analysis. With regard to case assignment, the study confirms that Kisafwa adheres to the Case Filter by ensuring that all overt NPs are assigned an abstract case. The nominative case is assigned by INFL (Tense/Agreement) to the subject NP in Spec-IP. The accusative case, on the other hand, is assigned by the verb to its NP complement, ensuring that objects receive proper case-marking. These findings reinforce the universality of GB's Case Theory but also highlight how Kisafwa exhibits language-specific patterns, such as the way infinitive clauses receive case in Kisafwa. The data also found that Kisafwa has three case assigners, which are verb, inflection and preposition. The researchers recommend that more studies be conducted on other Bantu languages and non-Bantu languages.*

KEYWORDS: Kisafwa, Case assignment, Noun phrase movement, infinitival clause, GB theory, nominative case, accusative case.



INTRODUCTION

This paper describes how cases are assigned to NPs in Kisafwa. Carnie (2007) argues that the NP and the case assigner must adhere to the locality constraint. Chomsky-style generative models assert that NPs move to specific positions to receive case through an agreement relation with a case-assigning head (Lyutikova & Ibatullina, n.d.). According to Burzio's Generalisation (Burzio 1986), predicates which do not assign a semantic role to their external argument cannot assign Case to their complement(s). This provides the answer to why the passive object must move. Passive verbs do not assign a semantic role to their external argument position, so they have lost the ability to assign Case to their complement. Therefore, the NP object cannot remain in place at S-structure and must move to a position where it can get Case.

In English, movement like raising involves a given NP from a non-finite clause in an embedded clause, which cannot assign case to a finite main clause where case can be assigned (Carnie, 2007). Case is generally assigned under the principles of Government and Binding (GB) Theory, where accusative case is assigned to the complement of a verb under government, and nominative case is typically assigned to the specifier of a [+Tense] projection (Chomsky, 1981). However, this framework raises theoretical concerns, particularly regarding whether a head can govern its specifier and the precise role of specifiers in case assignment (Chomsky, 1995). Despite these debates, it is commonly assumed within GB Theory that the nominative case is assigned to the subject NP by a finite Tense head through structural configuration (Vergnaud, 1977; Chomsky, 1995). In Kisafwa, a Bantu language, case assignment remains underexplored. It is unclear how noun phrases (NPs) receive nominative or accusative case, and how morphological and syntactic mechanisms interact to license case.

The objectives of this study are threefold: (i) to identify types of cases found in Kisafwa, (ii) to examine how NPs receive case within Kisafwa infinitival clauses, and (iii) to analyse how case is assigned to NPs in Kisafwa. Anchored in the GB framework, this study investigates the role of government, agreement and movement in case licensing, drawing comparative insights from related Bantu languages (Carstens, 2005; Diercks, 2012). The findings aim to contribute to our understanding of Kisafwa syntax and its implications for broader theoretical models of case assignment.

Case assignment in various Languages

Chomsky (1981) highlights case assignment as a fundamental component of sentence structure, crucial for identifying the syntactic roles of noun phrases across different types of sentences. It involves the syntactic mechanism by which a nominal element, typically a noun phrase, is assigned a grammatical case that signifies its role both syntactically and semantically within the sentence. This concept is central to syntactic theory, as it establishes the link between arguments and predicates. Furthermore, case assignment helps reveal the structure of sentences and mirrors the thematic roles of arguments, such as agent, patient or experiencer (Chomsky, 1981).

The assignment of a case can occur through two mechanisms, namely morphological case and abstract case. Both are crucial for understanding the syntactic and semantic relationship between arguments and predicates, but they function differently across languages.



Morphological Case

Morphological case involves the visible inflection or marking added to noun phrases (such as nouns and pronouns) to signal their grammatical function within a sentence. In languages like Russian or Latin, which utilise morphological case, the form of a noun changes depending on its syntactic role, such as subject or object. Baker (1996) notes that morphological case offers the clearest indication of syntactic relationships, providing explicit signals about the role a noun phrase plays in the structure of a clause. For instance, in Russian, subjects take the nominative case, direct objects take the accusative, and indirect objects are marked with the dative case (Chomsky, 1981). Kiparsky (2001) adds that in languages with morphological case systems, case assignment showcases the relationship between the argument structure and the syntactic organisation of the clause.

When looking at Bantu languages, particularly Luganda, Dierck (2012) observes the absence of morphological case. In Luganda, noun phrases retain the same surface form regardless of their grammatical roles, whether functioning as subjects, primary objects, secondary objects, or obliques. This phenomenon can be illustrated through where the noun *omuwala* ('girl') remains the same both when serving as the subject and when functioning as the object within different syntactic constructions in Example 1.

1) (a) *Yalaba omuwala*

“*Y-à-lábà òmùwálà.*”

1SM-PST-see 1. girl

“He saw the girl.”

(b) “*Òmùwálà y-à-mú-làbà.*”

1. Girl 1SM-PST-1O

“The girl saw him.”

Source: Dierck (2012, p. 355)

Similar to the elaborate case frameworks found in languages like Latin, German or Turkish, Bantu languages generally lack a case morphology system. Although this absence alone does not serve as definitive proof, the lack of overt morphological case marking on nouns supports the possibility that true case distinctions may be absent in these languages.

Abstract Case

Abstract case refers to a theoretical case assignment system in languages that lack overt morphological markers for case. In English, for example, the subject is assigned the nominative case, and the object is assigned the accusative case, but these cases are not overtly marked. Instead, they are abstract and assigned syntactically. According to Hornstein (1999), an abstract case is assigned through syntactic mechanisms, typically by functional heads like T (Tense) and v (little v) for a functional verbal head, which govern the assignment of case based on the syntactic structure of the sentence.



For instance, in a simple English sentence such as 'She loves him,' 'she' is assigned nominative case (abstractly), and 'him' is assigned accusative case. There is no morphological marking on these noun phrases; rather, they are licensed by the functional heads of the sentence, which include the subject (assigned nominative by T) and the object (assigned accusative by V).

According to Chomsky (1995), the assignment of abstract case is a central aspect of Minimalist Syntax, where case is a feature that must be checked to ensure the syntactic structure is valid. The assignment is not determined by overt morphological markers but is an abstract feature of the syntactic structure itself. Abstract case, therefore, provides a means to maintain syntactic well-formedness without requiring overt case morphology in languages like English or Chinese (Chomsky, 1995).

Diercks (2012) introduces a final diagnostic for determining the presence or absence of morphological case. He explains that in languages lacking overt case marking, Determiner Phrases (DPs) should be able to move freely out of case positions and even occupy multiple case positions within a sentence. This flexibility arises from the assumed activity associated with an unassigned Case feature, referred to as [uCase]. In Chomsky's standard probe-goal agreement framework, an uninterpretable feature such as [uCase] renders a syntactic element "active," making it eligible for probing operations. This notion is called the Activity Requirement. Under this system, a goal must possess an active feature to be visible for agreement with a probe. The feature responsible for a DP's activity, particularly in Indo-European languages, is assumed to be [uCase] (Chomsky, 2000).

Marten (2013) explores NP movement in Bantu languages, focusing on how case assignment influences syntactic positions and movement. Hence, the current research is essential for analysing how case assignment affects NP movement in Kisafwa.

In examining case assignment, it is valuable to explore language-specific studies that shed light on cross-linguistic patterns and offer insights into how case assignment mechanisms can vary. For example, Baker and Vinokurova (2010) conducted a detailed study on case assignment in Sakha, a Turkic language spoken in Siberia, which provides a useful framework for understanding nominative and accusative case assignments in relation to agreement. Their research demonstrates that case assignment rules can significantly differ across languages, offering a compelling basis for comparing nominative and accusative cases in languages like Kisafwa.

According to Baker and Vinokurova (2010, p. 4), the nominative case in Sakha is closely related to agreement on the functional head T (Tense). In particular, Baker and Vinokurova argue that Sakha is the Case Dependence of Agreement Parameter (henceforth CDAP) yes language, akin to languages like Indo-European, where finite T agrees overtly with a nominative noun phrase (NP). The nominative case is assigned in a familiar way, aligning with standard theories of agreement in syntactic theory. However, in contrast, the accusative case does not follow the same pattern. Therefore, instead of being linked to agreement with a functional head, the assignment of the accusative case in Sakha is governed by a different set of rules entirely. This distinction between nominative and accusative case assignment in Sakha is crucial for understanding how case assignment can be language-specific (Baker & Vinokurova, 2010). The following minimal pairs in Example 2 represent such a fact.



2) (a) “*Sonun-nar aaq-ylyn-ny-lar*.”

News-PL read-PASS-PAST-3pS

The news was read.

(b) “*Sonun-nar-y aaq-ylyn-na*.”

(**aaq-ylyn-ny-lar*)

New-PL-ACC read-PASS-PAST.3sS

read-PASS-PAST-3pS

‘The news was read.’

Source: *Baker and Vinokurova (2010, p. 4)*

As shown in Example 2(a), in the nominative case, the finite verb is in agreement with the subject “news.” However, in the accusative case, as indicated in 2(b), the verb does not agree with the subject but instead takes a default third-person singular form. This distinction in agreement between nominative and accusative cases provides valuable insight into the syntactic processes at play, and it also raises questions about how case assignment operates in other languages, particularly those with similar syntactic structures like Kisafwa.

Theoretical Framework

This study is grounded in Government and Binding (GB) Theory, a syntactic framework developed by Chomsky (1981) that explains how grammatical structures are generated and constrained by universal principles. A central component of GB Theory is Case Theory, which posits that every overt Noun Phrase (NP) must be assigned an abstract grammatical case to be syntactically licensed. This requirement is formalised as the Case Filter (Vergnaud, 1977; Haegeman, 1991). Within this framework, nominative case is assigned to the subject NP by a finite Inflection (I) head in the specifier position of Inflectional Phrase (IP), while accusative case is assigned to the object NP by the verb through a structural relation known as government (Chomsky, 1981; Haegeman, 1991).

Government refers to a local relationship between a head and its complement, allowing the head to assign a case to the governed NP. The Extended Projection Principle (EPP) further requires that the specifier of IP be filled, often triggering movement of the subject NP to satisfy both structural and case-related constraints (Chomsky, 1981). Although GB Theory was initially developed for languages with overt case morphology, it has been extended to languages with abstract case systems, where case is licensed through syntactic configurations rather than morphological markers. This theoretical model provides a robust framework for analysing case assignment in diverse languages, including those with limited morphological case marking like Kisafwa.

Theta Theory also forms an essential component of GB Theory, as it accounts for how verbs assign thematic (θ) roles to their arguments. Each verb specifies roles such as Agent, Theme, or Experiencer, and these must be assigned according to the Theta Criterion, which requires a one-to-one match between arguments and θ -roles (Chomsky, 1981; Radford, 2004; Carnie, 2007). In GB, θ -roles are assigned within the VP before any movement triggered by case or the EPP. Since an NP must receive both a θ -role and abstract case to appear overtly, theta role assignment and case assignment inevitably interact (Haegeman, 1991). This makes Theta Theory essential for analysing argument structure and NP behaviour in Kisafwa.



RESEARCH METHODS

The paper is qualitative in nature with descriptions, analysis, categorisation and explanation of the Case assignment in Kisafwa. The data were descriptively designed, as argued by Creswell (2020), that descriptive research determines and reports the way things are. The data were collected from Mbeya region, Mbeya rural district, specifically at Simboya village. The study involved five informants obtained through a convenience sampling technique. Sentence questionnaires and semi-controlled elicitation were used to collect data, whereas the thematic system was used in data analysis procedures. The research permit was offered by the Directorate of Postgraduate Research at Saint Augustine University of Tanzania. The informants were asked for their informed consent before they were involved in data collection. Verbal consent was sought as the level of literacy of the informants was low.

Case assignment on NPs in Kisafwa

Kisafwa, like other Bantu languages, does not exhibit morphological case. The language reflects an abstract case which is assigned to arguments in both finite and infinitive IPs. Unaccusative constructions also receive a case for their internal arguments at the external argument position.

Types of cases in Kisafwa

Case assignment is the syntactic process by which noun phrases (NPs) are licensed through the reception of abstract grammatical cases, such as nominative for subjects and accusative for objects. In Kisafwa, case assignment follows the principles of Government and Binding (GB) theory. The nominative case is assigned by Infl to subjects of finite clauses, while verbs assign the accusative case to their internal arguments. Although Kisafwa lacks overt morphological case markers, abstract case roles are evident through agreement morphology, word order and syntactic position. This paper examines how case assignment operates in Kisafwa across active and passive constructions, simple and conjoined NPs, and infinitival clauses, showing how government and NP movement interact to satisfy the Case Filter and ensure that all NPs are properly licensed.

Nominative Case in Kisafwa

In Kisafwa, the nominative case is canonically assigned to the subject NP of a finite clause by Infl (Inflectional). This assignment is reflected morphologically through subject agreement prefixes on the verb. Just like other Bantu languages, Kisafwa verbs receive subject markers which are obligatory than the lexical subject. That being the case, the nominative case is assigned to both the lexical subject and the SM. The assignment of the nominative case is reflected in the examples of Kisafwa sentences in 3.

3)

a) *Osenje alimile amangago*

O-senje a- lim- ile a-mangago

AUG1-aunt SM- cultivate PST AUG-maize

‘Aunt cultivated maize.’

b) *Obaba ayangete imadule*

Obaba a- ya- ngete i- madule

AUG1-father SM- PRES carry AUG- potatoes

‘The father carries potatoes.’

c) *Umwana awhigula uniyango*

U- mu-ana a- u- higula u-nyango

AUG1-cl.1-child SM-PRES open AUG-door

‘The child opens the door.’

Source: Field data (2025)

In Kisafwa, the nominative case is assigned to the syntactic subject of a finite clause. The nominative case primarily marks the subject of a clause, which is inherently the agent performing the action expressed by the verb. Subjects appear in the Spec-IP position (pre-verbal) and are cross-referenced on the verb through noun class agreement markers, ensuring that the NP and verb agree in person, number and class. For example, in 3(a), *osenje* ‘aunt’ carries the noun class 1 augment *o-* and the verb *alimile* contains the subject marker *a-*, signalling that this NP is nominative and functions as ‘the agent’ cultivating maize. Similarly, in 3(b) and (c), *obaba* ‘father’ and *umwana* ‘a child’ are marked with noun class prefixes and subject markers, establishing their role as the agents of carrying and opening, respectively.

The nominative NP not only occupies the canonical subject position but also controls agreement on the verb, which is crucial for grammatical coherence in Kisafwa. Additionally, the nominative NP is the recipient of the agent theta role from the verb, which defines its semantic function in the clause. This case system ensures that the verb’s arguments are properly licensed, allowing the language to maintain clear syntactic and semantic relationships between subjects and predicates. The examples in 3 can be assigned case and theta roles as in 4.

4) a) *Osenje alimile amangago*

NOM V ACC

AGENT THEME

‘Aunt cultivated maize.’

b) *Obaba ayangete imadule*

NOM V ACC

AGENT THEME

‘The father carries potatoes.’

c) *Umwana awhigula uniyango*



<i>NOM</i>	<i>V</i>	<i>ACC</i>
<i>AGENT</i>		<i>THEME</i>

‘The child opens the door.’

Source: *Field Data (2025)*

The examples in 4 illustrate that the nominative case is consistently assigned to all clause-level subjects, regardless of their theta roles. While the subjects in these examples are agents, the same pattern would apply to themes or experiencers in unaccusative verbs. In Kisafwa, subject-verb agreement functions as the primary morphological cue for nominative case, indicating syntactic subjecthood, whereas theta roles reflect the semantic function of the argument. This shows that nominative case assignment depends on syntactic position rather than semantic role, and it is unaffected by variations in argument type.

Some verbs in Kisafwa were found to allow patient/theme theta roles. Such verbs include intransitive unaccusative verbs like *khomwa* ‘be beaten’, *dwima* ‘sink’ and *fwa* ‘dye’. These verbs cannot assign accusative case to their NP complements, allowing them to move to the subject position to receive nominative case. This being the case, the nominative case is not necessarily assigned to the external argument; it can be assigned to the internal argument/object. Thus, this is assigned to any NP that occurs at the external argument position, be it an external or internal argument. Hence, the nominative case can be assigned to NPs with agent, theme, patient or even experiencer theta roles as in 5.

5) a) *Ibwa* *ifwa*
 NOM *V*
 THEME

‘The dog is dying’

b) *Umwana* *akhomwa*
 NOM *V*
 THEME

‘The child is being beaten’

c) *Inyumba* *izegwa*
 NOM *V*
 THEME

‘The house is being built’

Source: *Field Data (2025)*

The examples in 5 show how the same argument position with different theta roles can be assigned the same case, which is nominative. What suggests the case is the syntactic position



and the inflection, which is responsible for assigning the case. The nominative case cannot be assigned at the internal argument position, but if the internal argument moves to the external argument position, it receives the nominative case.

Accusative Case in Kisafwa

Accusative case in Kisafwa is structurally assigned by the verb to its complement NP, typically the direct object, in active transitive constructions. Although there are no overt accusative morphemes attached to the nouns in Kisafwa, the accusative case can be identified by the NP's syntactic position and its governed relationship to the verb. Also, the agglutinative nature of Kisafwa allows object marking on verbs, which may occur with lexical NPs or alone. Such are assigned the accusative case by the verb. The examples in 6 present this reality of accusative case assignment.

- 6) a) *Omaye akhoma umwana*

o-maye a-khoma u-mwana
AUG1-mother SM1-hit-FV AUG1-child
'The mother beat the child.'

- b) *Avhana vhamwavwizye omaye*

a-vha-ana vha-mu- avwa-ire omaye
AUG-cl.1- child SM-OM- help-PST mother
'The children helped the mother'

Or

Avhana vhamuhavizye
'The children helped her'

- c) *Umwana avazizye ishitabu*

u- mwana a-vazy-ile ishitabu
AUG-child SM-read-PST the book
'The child read the book'

Source: *Field Data (2025)*

In Kisafwa, the accusative case is used to mark the direct object of a verb, identifying the entity that is affected by or participants in the action described. Unlike the nominative subject, which appears pre-verbally in Spec-IP and is cross-referenced on the verb via subject agreement markers, accusative NPs typically occur post-verbally within the VP in Kisafwa, where they receive their theta roles directly from the verb. For example, in 6(a) *umwana* 'the child' is the patient of the hitting action, while in 6(b) *omaye* 'mother' is the beneficiary of the helping action. Also in 6(c) *ishitabu* 'the book' is the theme of the reading action. The object in Kisafwa can be attached to the verb as the object marker, such as *-mu-* in *vhamuhavizye* 'they helped her' in 6(b)



The accusative NP is fully integrated into the VP, ensuring that theta-role assignment is preserved. While these objects do not carry overt agreement markers like nominative subjects, they may be co-indexed with verb-internal object markers in certain constructions, showing agreement or control relations. Furthermore, accusative NPs in Kisafwa can participate in syntactic operations such as topicalization or WH-movement or any other movement. However, when movement displaces an NP outside its governing domain or deletes it altogether, case assignment is disrupted, and the NP loses its formal licensing. This is especially evident in unaccusative constructions, where the verb fails to assign accusative case. Here, the internal argument must raise to the subject position in order to obtain nominative case from Infl. In such contexts, movement is not optional but obligatory, ensuring that case requirements are satisfied.

In these cases, the object NP is displaced to a higher position, such as Spec-CP for discourse or interrogative purposes, leaving a trace in its canonical VP-internal position. This trace maintains the link between the verb and its object, ensuring that the grammatical and semantic roles are not disrupted by movement.

Heagmeman (1995) argue that every overt NP must be assigned abstract case; therefore, any construction containing an overt NP which is not assigned case is assumed that the Case Filter applies to all overt NPs. In Kisafwa, some verbs fail to assign the accusative case to their NP complements. Such verbs are the subjects of this study, as they instigate NP movement to fulfil case filter requirements. This supports the case and theta theory that every overt argument must be case-marked and theta-marked. The accusative case in Kisafwa highlights the syntactic and semantic distinction between subjects and objects, showing how the language encodes both argument structure and discourse functions through the position and behaviour of NPs within the clause. It demonstrates how active verbs in Kisafwa govern and assign accusative case to their direct objects, following the structural assumptions of Government and Binding theory. Although the accusative case is not overtly marked morphologically, its assignment is syntactically conditioned and essential for grammaticality and argument licensing.

Case Assignment in Infinitive Clause

Infinitival clauses present a unique challenge for case assignment in Kisafwa because they lack tense, which in finite clauses normally licenses nominative case for the subject NP. According to Government and Binding theory, the absence of tense means that subjects within infinitival clauses cannot receive nominative case locally and must instead depend on the higher matrix verb for case licensing. This structural limitation distinguishes infinitives from finite clauses, where case assignment occurs independently within the clause.

Different from what is revealed in the Government and Binding theory, in Kisafwa, the subjects of infinitival clauses are assigned nominative case by the FV, which is attached as a suffix to the verb. This functions as an indicative mood marker in Kisafwa. The internal objects of the infinitive clauses remain governed by the embedded verb and thus receive the accusative case in the usual way. So when present, the subject of the infinitive clause in Kisafwa is marked nominative case. This differs from other Bantu languages like Kiswahili, which use the prefix *ku-* 'to' in which the subjects of infinitival clauses are assigned accusative case by the matrix clause (Riedel & de Vos, 2017). This can be presented in Example 7.



- 7) a) *Ihwanze umwene ahwale usokoni*
I-hanz-e u-mwene a-hwal-e u-sokoni
 1SG-want-FV AUG1-person SM1-go-FV AUG17-market
'I want him to go to the market.'
- b) *Ambozezye ihugule unyango*
a-m-boz-ile i-hugul-e u-nyango
 SM1-OM-ask-APPL-PST I-open-FV AUG3-door
'She asked me to open the door.'
- c) *Vhayenje ati titeleshele ishalye*
Vha-yenj-e ati ti-teleshel-e i-shalye
 SM2-tell-PST we- 1PL-cook-FV AUG7-food
'They told us to cook the food.'

Source: *Field Data (2025)*

Since case is a structural feature, its behaviour in infinitive clauses in Kisafwa differs from that in finite clauses. In finite clauses, the subject marker on the verb realises nominative case assignment from tense, while the verb assigns accusative case to its object. However, infinitive clauses lack tense, which makes their case unique. In Kisafwa, the nominative case is assigned through verbal inflection. The indicative final vowel *-e* in infinitival clauses assigns nominative case even in those clauses. Therefore, verbs like *hwale* 'to go', *hugule* 'to open', and *teleshe* 'to cook' can take subject markers in infinitival clauses just as they do in main clauses. For instance, in 7(a), the FV *-e* in the infinitival verb *-hwale* "to go" assign nominative case to *umwene* 'him' and the SM *-a-* within the verb.

Similarly, in 7(b), the infinitive *ihugule* 'to open' assigns accusative case to *unyango* 'the door'. The first person subject marker *i-* is assigned nominative case by the FV *-e* which stands as inflection in the verb. The object marker *-m-* in the matrix verb *-mbozezye* is assigned accusative case by the matrix verb *bozya* 'ask'. In 7(c) the embedded infinitive *-teleshele* 'to cook' assigns accusative case to the internal argument *ishalye* 'food' while the FV *-e* assigns nominative case to the first person plural subject marker *ti-*. So the subject of the infinitive in Kisafwa receives case licensing from the final vowel *-e*, allowing the NP to appear in its proper syntactic position while maintaining theta-role assignment. The data show that, Kisafwa retain their theta roles within the infinitive clause, and there is no dependence on the matrix verb for case marking, which differentiates it from other languages like Kiswahili, where the subject is typically null or controlled by the matrix clause. This shows that in Kisafwa, infinitive clauses do not differ from finite clauses in how case assignment is licensed. The only difference is that in finite clauses, the nominative case is assigned by tense, while in an infinitive clause, it is assigned by FV *-e*.

Case Assigners in Kisafwa

Case assignment in Kisafwa is determined by specific functional and lexical heads that govern the distribution of noun phrases within the clause. Following the principles of Government and Binding theory, three case assigners can be identified: the verb, inflection (Infl) and the



preposition. Each of these operates under structural conditions to license NPs, ensuring they comply with the Case Filter.

The Verb as a Case Assigner

In Kisafwa, the verb functions as a central case-assigning element within the clause structure. It assigns the accusative case to its internal arguments, which include direct and indirect objects in both transitive and ditransitive constructions. In monotransitive clauses, the postverbal object receives the accusative case from the verb, ensuring its syntactic licensing. Likewise, in ditransitive structures, the verb assigns case to both the Theme and Goal arguments, provided they occupy positions within the Verb Phrase (VP). This relationship between the verb and its objects underlines the verb's pivotal role in maintaining the grammatical integrity of the clause. The evidence is presented in 8.

- 8) a) *Omaye ateleshile ishalye*
- | | | |
|--------------------|---------------------|------------------|
| <i>O -maye</i> | <i>a-teleshile</i> | <i>i- shalye</i> |
| <i>AUG- mother</i> | <i>SMI-cook-PRS</i> | <i>AUG- food</i> |
- ‘The mother cooked the food.’

- b) *ubaba akhoma umwana*
- | | | |
|-------------------|---------------------|-------------------|
| <i>U-baba</i> | <i>a -khom- a</i> | <i>u- mwana</i> |
| <i>AUG-father</i> | <i>SM -beat-PRS</i> | <i>AUG- Child</i> |
- ‘The father beat the child’

Source: *Field Data (2025)*

In 8(a), the verb *teleha* ‘cook’ and *khoma* ‘beat’ functions as the primary assigner of the accusative case. The internal argument of the verb, *ishalye* ‘food’ and *mwana* ‘child’, is licensed structurally by the verb because it occupies the post-verbal position within the verb phrase. Without the verb’s ability to assign case, the object NP would remain unlicensed and violate the Case Filter. At the same time, the verb assigns the agent theta role to *Omaye* ‘mother’, and *Ubaba* ‘father’, who performs the action, and the theme to *ishalye* ‘food’ and *umwana* ‘child’, the entity affected by the action. Thus, in Kisafwa, the verb not only determines the semantic roles of its arguments but also provides the structural case licensing necessary for grammaticality, ensuring that direct objects receive the accusative case.

The data reveal that, in Kisafwa, some verbs lack the structural capacity to assign accusative case to their internal arguments, and this deficiency directly triggers NP movement. According to Burzio’s Generalisation (1986), verbs that fail to assign an external theta role also lack the ability to assign accusative case. This principle accounts for why intransitive unaccusative verbs in Kisafwa cannot license their internal arguments in situ. Although these verbs project an internal argument within the verb phrase (VP), they lack an external argument that could assign accusative case.



Kisafwa, in addition, contains verbs which can assign a theta role to the external argument and still cannot case-mark the NP complement. Reciprocal and reflexive verbs in Kisafwa possess this feature, which is unique to Bantu and Kisafwa. In such constructions, the internal argument has to move and merge with the external argument, making it have two theta roles and one case, nominative assigned to the external argument position by inflection. This seems to contradict the argument by Burzio (1986) that a verb which cannot theta-mark its subject cannot assign accusative case to its NP complement. This adds to the theory that even some verbs which theta-mark their subjects may lack the ability to case-mark their internal arguments. Consequently, the internal argument must move to the subject position (Spec-IP) to receive nominative case from the inflectional head (INFL), thereby satisfying the Case Filter. This can be seen in 9.

9) a) *Ubingwa ajipimile*

Ubingwa a- jipim -ile

Bingwa SM- test on self PST

“Bingwa has tested himself”

b) *Avasahala vahalenganyizanya*

Avasahala va- ha lenganyizanya

Youths SM- Prs teach one another

“The youths are teaching one another”

Source: *Field Data (2025)*

This syntactic process aligns with Perlmutter’s (1978) Unaccusative Hypothesis, which proposes that the single argument of unaccusative verbs originates in the object position before moving to the subject position. Therefore, the data reveals that in Kisafwa, at the Deep Structure, the subject *ubingwa* ‘Bingwa’ and *avasahala* ‘youth’ in (9) originate as internal arguments, so the reflexive verb *jipima-* ‘tested’ and reciprocal verb *lenganyizanya* ‘teach one another’ fail to assign accusative case internally, so the NP moves to the subject position to obtain nominative case. Similarly, in stative and reflexive constructions, the presence of morphological markers like *-ji-* absorbs the verb’s case-assigning capacity, leaving the internal argument without case until movement occurs.

This analysis is consistent with findings from other Bantu languages. Zeller (2006) and Bostoen and Kawasha (2021) observe that in many Bantu languages, verbs lacking external arguments, particularly unaccusative and reflexive forms, display the same structural deficiency, forcing internal arguments to undergo NP movement for case licensing. This evidence supports the argument that Kisafwa conforms to general principles of Government and Binding Theory, where case deficiency in the verb directly motivates syntactic movement. Hence, the inability of certain verbs to assign accusative case is not an anomaly but a predictable feature that ensures structural well-formedness within the Kisafwa clause.



Inflection (Infl) as a Case Assigner

In Kisafwa, Inflection (INFL) functions as the primary assigner of the nominative case to the subject noun phrase (NP) in finite clauses. This occurs when the NP occupies the specifier position of INFL (Spec-IP) and bears agreement features that correspond to the subject marker (SM) attached to the verb. All canonical subjects in Kisafwa finite clauses receive the nominative case in this manner, ensuring they are licensed under the Case Filter, which requires every overt NP to be case-marked. This is illustrated in 10.

- 10) a) *Udada akhomwilwe nno obaba*

Udada a - khomw – ile nno obaba

Sister SM- be beaten-PST by the father

“The sister was beaten by the father”

- b) *Idirisha lyahigushe*

Idirisha li a - hi – guh-ile

Window SM-be opened-PST

“The window opened”

- c) *Vhayenje titeleshele ugali*

Vha-yenj-ile ti - teleshel-e ugali

SM2-tell-PST SM-to cook-FV ugali

‘They told us to cook ugali.’

Source: *Field Data (2025)*

In Example 10, Infl functions as the assigner of the nominative case in the verb *khomwilwe* ‘was beaten’ and *higushe* ‘opened’ to the subject NP *udada* ‘sister’ and *idirisha* ‘window’ in the passive constructions in Kisafwa. The internal argument *udada* ‘sister’ and *idirisha* ‘window’ moves to Spec-IP to receive nominative case from past tense INFL, since the passive verb cannot assign accusative case internally. Because Kisafwa subjects must receive a case to satisfy the Case Filter, NP movement is obligatory to ensure that *udada* ‘sister’ and *idirisha* ‘window’ are properly licensed as nominative by the INFL.

In this way, INFL provides the structural case assignment necessary for the subject while the verb independently assigns the semantic theta role. The subject position of a finite verb cannot be empty. So, if it happens that the verb cannot theta-mark its external argument, an argument will be moved from the internal argument position to fill such a gap.

Different from other languages, including English, in non-finite clauses, INFL lacks tense but has the FV -e which assigns nominative case to its subject. Therefore, the SM *ti-* in *titeleshele* “we to cook” is assigned nominative case internally by the final vowel -e of the verb. In such cases, the embedded subject must rely on the matrix verb for case assignment. This distinction contradicts Chomsky’s (1981) proposal that only finite INFL is capable of assigning



nominative case. The same principle applies in Kisafwa finite verbs, but in infinitival clauses, non-finite morphology hosts independent subjects just like finite clauses with the infinitive final vowel *-e* of the verb. In (7c), the embedded verb *teleshele* ‘to cook’ is non-finite, and its INFL lacks tense features, but it is capable of assigning nominative case in the final vowel of the verb.

Preposition as a Case Assigner

In Kisafwa, prepositions are important case assigners for noun phrases (NPs) that occupy peripheral or oblique positions within a clause. Unlike verbs, which assign accusative case to internal arguments and INFL, which assigns nominative case to subjects in finite clauses, prepositions license NPs that cannot receive case from either the verb or INFL. In Kisafwa, the agent in passive constructions is marked by the prepositions *na* ‘with’ or *nna* ‘by’. Both of the two prepositions serve as oblique case assigners, introducing the external argument when the verb is passive and cannot assign the accusative case. These prepositions ensure that all overt NPs satisfy the Case Filter, maintaining grammaticality in clauses where the verb or INFL cannot directly assign case. This is presented in 11.

11) a) *umwana ahumvazizya nnno mwalimu*

Umwana a - hu - mu-vazizy -a nna omwalimu

Child SM- PST -OM-teach by teacher

‘The child was taught by the teacher’.

b) *Uilumbu akhomwilwe ni nzansu*

Uilumbu a - khomw - ile na inzansu

Sister SM- beaten -PST with a stick

‘The sister was beaten with a stick’.

c) *Ing’ombe ilashilwe ni shiso*

Ing’ombe i - lashw- ile na ishiso

Cow SM- stabbed Pst with a knife

‘The cow was stabbed with a knife.’

Source: *Field Data* (2025)

Examples in 11 demonstrate that prepositions in Kisafwa assign case to peripheral arguments, particularly agents and instruments, when the verb itself cannot. This behaviour aligns with general Bantu syntax, where prepositions are morphologically simple but syntactically significant. As Zeller (2006) and Bostoen and Kawasha (2021) argue that in many Bantu languages, prepositions such as *nna* ‘by’ act as oblique case assigners, introducing agents in passive constructions or marking instruments and means. Kisafwa follows this typological pattern, using *na* ‘with’ and *nna* ‘by’ to license oblique arguments in contexts where verbal case assignment is unavailable.



In conclusion, prepositions in Kisafwa serve as vital case assigners for noun phrases that cannot receive case from the verb or INFL. They introduce agents and instruments in passive clauses, ensuring that every NP within the clause is properly licensed. The alternation between *na* 'with' and *nnā* 'by' reflects phonological or dialectal variation rather than functional difference, as both assign oblique case. This pattern supports the broader argument that case assignment in Kisafwa is distributed across multiple grammatical elements: the verb, INFL, and preposition, each contributing to the overall syntactic well-formedness of the clause.

CONCLUSION

Case assignment in Kisafwa adheres to the Case Filter by ensuring that all overt NPs are assigned an abstract case. The nominative case is assigned by INFL (Tense/Agreement) to the subject NP in Spec-IP, as shown in examples where the subject controls verb agreement. The accusative case, on the other hand, is assigned by the verb to its complement within VP, ensuring that objects receive proper case-marking. These findings reinforce the universality of GB's Case Theory but also highlight how Kisafwa exhibits language-specific patterns, such as the way infinitive clauses receive case in Kisafwa. The data also found Kisafwa has three case assigners, which are verb, inflection and preposition.

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