

The Rudowitz Extradition Case

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IN OCTOBER, 1908, the Russian consul in Chicago, Baron Ernest von Schilling, applied for the extradition of Christian Ansoff Rudowitz, a refugee who had fled to the United States and settled in Chicago after taking part in the disorders accompanying the Revolution of 1905. Upon the action by the Russian consul, Rudowitz, a farm laborer from the Baltic province of Courland, was arrested and incarcerated in the Cook County

Jail. The publicity that surrounded the ensuing hearings and appeals focused national attention on the issue of American relations with the government of Czar Nicholas II.

According to Russian officials, the crimes for which Rudowitz was sought — murder, arson, burglary, robbery, and larceny in the Courland village of Benen during the winter of 1905-1906 — came under the extradition clause of the 1887 treaty between the United States and Russia.

American critics of czarist repression took a different view. To them, the alleged offenses of the thirty-five-year-old Lettish peasant were entwined with the political disturbances of the time, and hence he was not subject to extradition. Most of the agitation for his release was centered in Chicago — where the atmosphere became so embittered that the

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Christian A. Rudowitz, as sketched for the Chicago Daily Socialist

consul and his attorney, William C. Rigby, received anonymous threats.¹ Yet mass protest meetings were held as far west as Stockton, California, and petitions were sent to the State Department and the White House from such similarly distant cities as Vancouver, Washington, and Salmon City, Idaho.²

At first, concern over Rudowitz's plight was limited to radical elements in Chicago, where the *Daily Socialist* newspaper, under the editorship of Algie M. Simons, initiated an energetic protest movement that mounted in intensity with each passing week. The socialist newspaper printed numerous editorials favoring asylum for political offenders from abroad as well as frequent cartoons that dramatized czarist repression. Beginning on November 21, 1908, the newspaper carried daily front-page stories on the extradition hearings,

which were held in Chicago before United States Commissioner Mark A. Foote. Moreover, when other local newspapers did not rally immediately in Rudowitz's defense, the *Daily Socialist* charged that their "shameful" behavior was "an instance of the great kings of capitalism controlling the press against all the remainder of society." The *Chicago Tribune* was singled out for special criticism: "This paper is controlled by the McCormick family, the dominant financial interest in the International Harvester company. The largest market for the products of this company, outside the United States, is Russia. . . . It does not require the services of Sherlock Holmes to determine why the Tribune is silent, or worse, in its relation to the attempt of Russia to invade American soil and wipe out long-established rights."³

The *Daily Socialist* was even more condemning of the American government, accusing it of collaboration with Russian authorities. Denouncing "the alliance of blood" that had been forged by the czar with President Theodore Roosevelt and his handpicked successor, William H. Taft, the newspaper claimed the existence of a tripartite pact between the Russian secret service, the Pinkerton Detective Agency, and Washington officialdom. "The whole Pinkerton system," announced the newspaper, "is now an adjunct of

¹National Archives, Microfilm Publication M862: *Numerical and Minor Files of the Department of State, 1906-1910* (Washington: General Services Administration, 1972), Roll 969, frames 0001-0032 (hereafter cited as National Archives, M862). The United States-Russian Extradition Convention was concluded on March 28, 1887, but not proclaimed until June 5, 1893. Articles I and II provided for the "surrender to each other, upon mutual requisitions and according to their respective regulations and procedure," of persons who had sought asylum in the other country after having been "charged with, or convicted of" the commission of such crimes or offenses as murder, rape, arson, burglary, robbery,

the Russian secret service bureau. . . . The plan of the campaign is for the Pinkertons to run down the political prisoner, however humble he may be, that the czar wants. Then the complacent authorities at Washington kow-tow to the bloody-handed butcher of Red Sunday, the arch-murderer of the twentieth century, the torturer of little girls, and hands the prisoner over to 'justice.'"⁴

To the benefit of Rudowitz, Simons, through the *Daily Socialist*, did more than rail against czarist tyranny and the complacency of Washington authorities. Less than a week after the Lettish fugitive's arraignment before Commissioner Foote, the paper invited all local societies "interested in the rescue of Christian Rudowitz from the clutches of the Russian officials" to send representatives for

larceny, forgery, counterfeiting, embezzlement, and mutiny. Article III stated that for political offenses "surrender shall not take place" and stipulated that an act against the life of the head of either government, or against any member of his family, was not to be considered a political offense. *Treaties, Conventions, International Acts, Protocols and Agreements between the United States of America and Other Powers, 1776-1909*. Senate Document 357, 61 Cong., 2d Sess. (1910), II, 1527-29.

²For examples of the numerous protest meetings, petitions, and other appeals on Rudowitz's behalf, see National Archives, M862, Roll 970, frames 0098-0510. That most of the agitation took place in the area west of the Alleghenies is easily explained. New York and the Atlantic seaboard were preoccupied with the Russian government's concurrent efforts to extradite Jan Janoff Pouren, a Latvian peasant who had fled to New York. As in the case of Rudowitz, Pouren's supporters claimed that the charges against him were of a political nature.

³*Chicago Daily Socialist*, Nov. 30, 1908, p. 6, col. 1.

⁴*Ibid.*, Nov. 9, 1908, p. 1, col. 6, p. 6, col. 1. The Pinkerton agency was known for its strong support of international extradition treaties.

⁵*Ibid.*, Nov. 11 (p. 1, col. 7), Nov. 23 (p. 1, col. 7), 1908.

⁶*Ibid.*, Dec. 30, 1908, p. 1, col. 1.

⁷A copy of the pamphlet is included in National Archives, M862, Roll 968.

creating a permanent, nonpartisan organization "to combat the plots of the czar." The response to that appeal was so great that within two weeks several meetings were held in Chicago for organizing a national movement to resist the extradition of political refugees. Concurrently, calls were made to other cities throughout the country urging similar meetings.⁵

The Political Refugee Defense League was organized in Chicago and attracted thousands of members as a result of the Rudowitz affair. Within a few weeks the League, which held weekly executive council meetings at Hull-House, claimed branches in 185 cities in twenty-seven states.⁶ Its activities included circulating petitions, sponsoring protest meetings, raising funds, and in late November publishing a detailed pamphlet on the extradition hearings then in progress. The pamphlet, entitled *Shall America Soil Her Hands in Blood?*, asserted that the trial concerned not simply a "penniless, obscure and humble Russian farmhand," but America itself. According to the League, if Washington officials played "into the hands of the imperial bloodhound" by sending Rudowitz to certain death in Russia, the heritage of American democracy would be disgraced. The pamphlet concluded with the appeal:

America! Your tradition is in danger of being disregarded by your very representatives. Hating the yoke of tyranny, having fought against it with your life blood, will you who were born in the throes of revolution deny refuge to the oppressed of other lands? . . . Your country, the threshold of the oppressed, must not be barred. Do not grasp the blood-dripping hand of Nicholas, but take to your bosom the bleeding victims of his oppression.⁷

The largest of many meetings sponsored by the Political Refugee Defense League was held at the Seventh Regiment Armory in Chicago. Three thousand persons listened to speeches opposing Rudowitz's extradition and

The Chicago Inter Ocean printed this montage of principal characters in the Rudowitz case. Lengin Gerus, a member of the Russian Duma, was a defense witness. Clarence Darrow and Isaac Hourwich represented Rudowitz, and William C. Rigby represented the Russian consulate. Commissioner Mark A. Foote conducted the extradition hearings.



LENGIN GERUS

CHRISTIAN RUDOWITZ

ATTORNEY
I. A. HOURWICH



ATTORNEY
CLARENCE G.
DARROW



ATTORNEY
W. C. RIGBY



U.S.
COMMISSIONER
MARK A. FOOTE

adopted resolutions to be sent to President Roosevelt, President-elect Taft, Secretary of State Elihu Root, and other government officials. The speakers included former Mayor Edward F. Dunne, Algje Simons, and the national secretary of the Political Refugee Defense League, Raymond Robins. In what the *Daily Socialist* characterized as "the speech of the day," Robins charged that the large bankers of America wanted the extradition of Rudowitz so that they could continue their profitable bond peddling for the czar, and he called upon the ghosts of Jews murdered during the infamous 1903 pogrom at Kishinev to haunt the holders of the Russian bonds. Robins expressed the hope that agitation against extradition would swell to such proportions that "not a single banking house in New York or anywhere else in America" would "dare to offer a Russian loan in the United States." His remarks were frequently interrupted by applause, and his declarations that "every man who is not a revolutionist in Russia is a traitor" and "there is no man in America who is in sympathy with the czar who is not also a traitor to human freedom" brought applause and cheers.⁹

Chicago reformers, social workers, and Progressives rallied to the cause. Robins followed up his rousing speech with two trips to Washington, and Jane Addams became

treasurer of a fund established for defraying the appeal expenses. Others who assumed important roles included Louis F. Post, editor of *The Public* and vice-president of the Political Refugee Defense League. Four attorneys served without remuneration: Clarence S. Darrow, Charles Cheney Hyde of Northwestern University Law School, socialist Peter Sissman, and Isaac A. Hourwich, a naturalized American citizen from New York who had been forced to flee his native Russia years earlier because of revolutionary activities. Hourwich was sent to Chicago by the Jan Janoff Pouren Defense Conference, a New York organization comprising 210 societies united in their determination to resist extradition of Russian political refugees.⁹

One of the themes advanced repeatedly throughout the hearings was that the forced return of Rudowitz would establish an unfortunate precedent, resulting in the abolition of political asylum in the United States. The *New York Evening Post* expanded upon that widely shared opinion:

The true object of the Russian authorities in their present campaign of extradition is not hard to guess. In reality, the Russian government is interested not in the situation here, but within its own borders. There the authorities wish to create the impression that America can no longer be looked to as a place of asylum by the enemies of the established order. . . . If the world can be closed to the revolutionists, with anything like the effectiveness attained within the Czar's dominions, the Russian autocracy will have reduced the chances of further revolutionary opposition to a minimum.¹⁰

In an opening defense statement at the extradition hearing, Clarence Darrow argued before Commissioner Foote that Rudowitz was merely the tip of the iceberg, "one of perhaps 20,000 men . . . living in this country as a political asylum from Russia." If Rudowitz could be extradited, warned Darrow, all political refugees would "go with him

⁹*Chicago Daily Socialist*, Dec. 1, 1908, p. 1, cols. 5 ff.

¹⁰*Ibid.*, Nov. 11 (p. 1, col. 7), Nov. 21 (p. 1, cols. 1-2), 1908; *New York Call*, Nov. 4 (p. 4, cols. 1-2), Nov. 21 (p. 1, col. 1), 1908; Jane Addams, *Twenty Years at Hull-House* (New York: Macmillan, 1910), p. 417. Hourwich had long been a critic of America's extradition treaty with Russia, regarding it as "a departure from the traditional policy of free asylum to which this country has hitherto adhered." See Hourwich, "The Russian-American Extradition Treaty," *Yale Review*, 3 (1894), 94.

¹⁰As reprinted in the *New York Call*, Nov. 23, 1908, p. 6, col. 2.

as fast as the Russian government can furnish the means and the guns to execute them." The defense counsel admitted that Rudowitz had participated in a meeting that voted death sentences for three government "spies" but also presented well-documented arguments that he was not involved in the actual murders. Prosecutor Rigby maintained that Rudowitz's involvement comprised a criminal activity.¹¹

On December 7, after two weeks of hearings, Commissioner Foote ruled in favor of extradition. In a twenty-seven page certificate of finding, he reviewed the complaint filed by the Russian government, summarized the hearings, and expressed his belief that there was sufficient evidence "to sustain the said charges of Murder, Arson, Burglary, Robbery and Larceny under the provisions of the treaty of extradition." Foote concluded: "[It] does not now appear that such extradition is sought with a view to try or punish said Christian Rudowitz for an offense of a political character, and I have so found."¹²

Reactions to the decision were overwhelmingly negative. Prominent Chicago socialist attorney Seymour Stedman, in a speech to members of the Political Refugee Defense League just hours after the ruling was announced, charged that Commissioner Foote had acted as one of the "czar's police" and was "equally guilty with the bloody butchers and torturers" serving Nicholas in Russia.¹³

On the following day the *Chicago Daily Socialist* reported the decision in a front-page story under the glaring headline "Sends Rudowitz Back to Czar's Tortures" and featured a photograph of Foote captioned "Man Who Made Vicious Decision." Also printed on the front page was a gruesome poem, in which Rudowitz received expressions of "welcome" from the "Comb of Kiev, a little instrument which tears the pulsing human flesh into fine filaments, which shreds

the tender nerves and draws them out as a beauty's tresses are drawn through a silver comb by her maid in waiting"; "Maria Ivanovna, the wire-thonged, many tongued whip which raises human flesh in serried, bloody welts bordered by dripping ruddy furrows"; and, finally, after the hapless peasant had "told all under torment," the "swift and sure bullet."¹⁴

An editorial in the same issue called for a "protest so tremendous" that American officials seeking to abolish asylum for political refugees would have no doubt as to the enormity of their error. Supporters were urged to organize "thousands of groups . . . in every corner of the country for purposes of agitation and education" that would circulate petitions, raise money, print and distribute literature, and encourage other societies to "adopt firm, determined resolutions demanding that the right of asylum be maintained inviolate."¹⁵

A similar appeal was made on December 10 by the editors of the *New York Call*, a leading socialist daily that two days earlier had declared angrily:

If the United States is to send back Rudowitz, it ought first to order the Declaration of Independence burned by the public hangman, decree that the Fourth of July shall henceforth be observed as a day of national penitence for the

¹¹National Archives, M862, Roll 969, frame 0220. According to another critic of extradition, Darrow severely underestimated the number of Russian political refugees in the United States. Gustavus Myers claimed that in New York City alone there were at least 850,000 former subjects of the Czar, 50,000 of whom could have been classified as distinct political refugees involved to some extent in the revolutionary movement. See Myers, "The Tsar's Spy System in America," *Harper's Weekly*, Nov. 28, 1908, p. 9.

¹²National Archives, M862, Roll 969, frames 0008-0035.

¹³*Chicago Daily Socialist*, Dec. 8, 1908, p. 1, col. 6.

¹⁴*Ibid.*, cols. 6-7.

¹⁵*Ibid.*, p. 6, col. 1.

A STRANGER IN A STRANGE LAND APPEALS FOR JUSTICE



Chicago Daily Socialist cartoon of the extradition hearings

crimes of 1776, and command the demolition of every statue or monument that has ever been erected to George Washington, John or Samuel Adams, Patrick Henry, John Hancock, Ethan Allen, Benjamin Franklin, or any of the men whom our forefathers acclaimed as patriots and whom the British rulers branded as criminals and threatened with death on the gallows.¹⁶

Rudowitz's attorneys, vowing that he would not be returned to Russia "until the last ditch is taken in the fight against extradition," sought the intervention of Secretary of State Elihu Root.¹⁷ On the day following Foote's ruling, Hyde, who with Darrow had presented the case for the defense, sought an appointment with Root in order to enumerate the grounds on which they maintained Rudowitz's protection from the Russian government. In rejecting Hyde's request, Secretary Root stated that although the State Department did not hear oral arguments in extradition cases, consideration would be given to a written brief. Root advised, however, that such a statement be delayed until after a formal report was issued by Commissioner Foote. That report was completed on December 26, and in early January, 1909, Hyde sent Secretary Root a lengthy defense brief.¹⁸

Another action by Hyde after the Foote ruling elicited a more immediate response. At Hyde's request, his colleague John H. Wigmore, dean of the Northwestern University Law School and author of a standard textbook on American legal evidence, analyzed the nearly 350 pages of hearing testimony and in a report dated December 11, 1908, concluded that Rudowitz was clearly a political refugee and should not be extradited. Wigmore's report, which was endorsed by Dean James Parker Hall of the University of Chicago Law School, was forwarded to Secretary Root, and numerous copies were distributed by the Political Refugee Defense League.¹⁹

Meanwhile, public agitation continued.

Students and faculty organized protest meetings at the University of Chicago, Northwestern University, the University of Illinois, and the University of Wisconsin.²⁰ The White House and the State Department were inundated with letters and petitions, which poured in not only from Chicago and other large cities but also from such places as Cedar Falls, Iowa; Ozark, Arkansas; Biloxi, Mississippi; and Needville, Texas.²¹

The Political Refugee Defense League also increased its activities, including publishing and distributing 25,000 extracts from a 1907 "torture pamphlet" of the Imperial Russian Duma, a document that detailed the terrible punishments inflicted upon prisoners by Russian officials in the Baltic region during suppression of the 1905 Revolution.²² In most cities with League chapters, there were public rallies, some attracting huge crowds. At a December 27 rally at Chicago's Colonial Theater, all the seats and the aisles were filled, and several hundred persons stood outside. Among those on the speakers' platform were United States Senator from Illinois Albert J. Hopkins, Democratic Congressman Adolph J. Sabath, Republican Congressman Martin B. Madden, Jane Addams, University of Chicago Professor Samuel L. Harper, and a number of prominent judges, attorneys, and clergymen. All of the speakers denounced the

¹⁶*New York Call*, Dec. 10 (p. 6, cols. 1-2), Dec. 8 (p. 8, col. 1), 1908.

¹⁷*Ibid.*, Dec. 7, 1908, p. 1, col. 7.

¹⁸National Archives, M862, Roll 970, frames 0003-0052.

¹⁹*Chicago Daily Socialist*, Dec. 29, 1908, p. 1, cols. 5 ff.; *New York Call*, Dec. 29, 1908, p. 3, cols. 1-3.

²⁰*Chicago Daily Socialist*, Dec. 18 (p. 1, cols. 4 ff.), Dec. 22 (p. 1, col. 7), 1908; *New York Call*, Dec. 21, 1908, p. 1, col. 5.

²¹Hundreds of such letters and petitions are included in National Archives, M862, Rolls 968-970.

²²*Ibid.*, Roll 749, Defense Exhibit No. 22; *New York Call*, Jan. 5, 1909, p. 3, col. 1.



A huge crowd assembled at the Colonial Theatre to hear prominent Chicagoans denounce the extradition ruling.

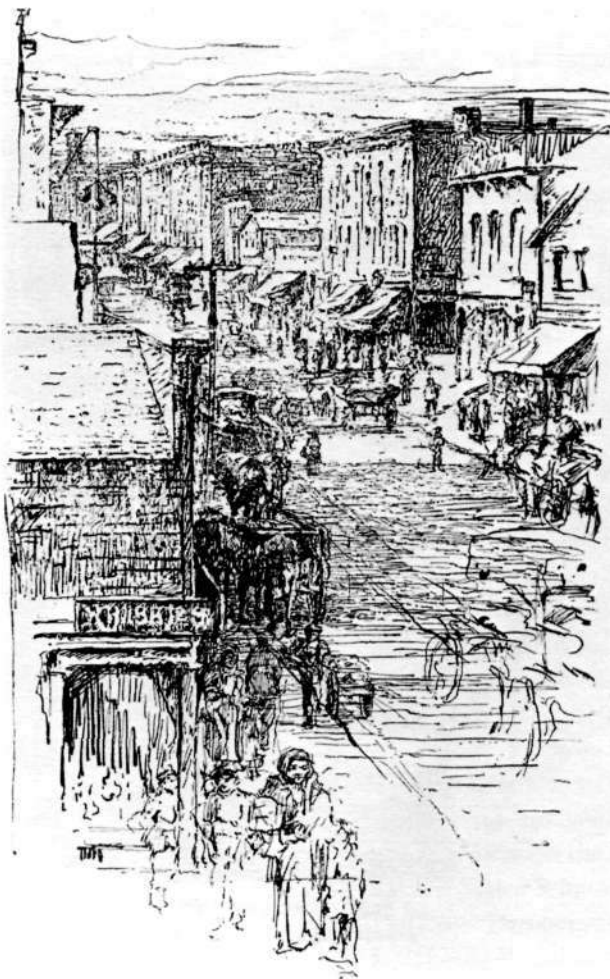
Footnote ruling and exhorted the audience to make known to Washington officials their desire that America remain a haven for political refugees.²³ The St. Paul, Minnesota, *Daily News* of January 2, 1909, effectively summarized the sentiments of the activists for Rudowitz, "It is more important that the United States should remain an asylum for the politically oppressed than that any number of

common criminals should be hanged." The newspaper continued, returning Rudowitz to Russia "would be a crime against the principles and traditions of our land. . . . It would show that we had forgotten Lexington and Valley Forge and Gettysburg and had become a people no longer worthy of the blessings we inherit."²⁴

Included among Rudowitz's supporters was a candidate in the 1908 presidential election — Eugene V. Debs, the great moral force of American socialism. Few individuals were more passionate than Debs in urging concerted action on behalf of the Latvian fugitive. On December 26, he released the

²³National Archives, M862, Roll 970, frames 0121–0191; *Chicago Daily Socialist*, Dec. 29, 1908, p. 1, cols. 7 ff.; *New York Call*, Dec. 28, 1908, p. 2, col. 3.

²⁴National Archives, M862, Roll 970, frame 0310.



South Halsted Street, ca. 1909, from *Jane Addam's
Twenty Years at Hull-House*

following statement through *Appeal to Reason*, the national socialist journal:

The simple truth is that Rudowitz is a Russian revolutionist. . . . He joined the revolution and this patriotic resolve now constitutes his crime. In the eyes of every honest man it is his glory. . . . Shall this fellow worker, this comrade of ours, this heroic soul, be handed over to the fiend incarnate, whose clutches, dripping with the blood of babes, are even now at his throat? Has it come to this in the land of Patrick Henry and the star spangled banner that the czar of Russia dare to reach over here and snatch from our very midst the victims of his satanic cruelty and blood thirstiness? . . . What shall we do? Rise in indignation and protest all over

this nation! . . . No time is to be lost. . . . Arouse, oh fellow workingmen, in all the states of the union, and shake this nation with your mighty protest!²⁵

An outgrowth of such sentiments was a spirited campaign in favor of unilateral abrogation of the American-Russian extradition treaty. Beginning in November, the *Chicago Daily Socialist* and the *New York Call* printed numerous editorials demanding that

²⁵As reprinted in *New York Call*, Jan. 1, 1909, p. 2, cols. 6-7.

Jane Addams was a leader in the movement against extradition of Rudowitz and other political refugees. She declared: "If the decision of the federal office in Chicago had not been reversed by the department of state in Washington, the United States government would have been committed to return thousands of spirited young refugees to the punishments of the Russian autocracy."



the treaty, "an insult to humanity," be abandoned.²⁶ Soon thereafter the Political Refugee Defense League and the Pouren Defense Conference organized meetings throughout the nation to rally support for abrogation. A typical meeting took place at the end of December in Minneapolis, where a large and enthusiastic crowd heard the treaty denounced by such respected citizens as former Mayor W. H. Eustis, former Governor John Lind, and University of Minnesota President Cyrus W. Northrop.²⁷

The abrogation movement continued for

²⁶See, for example, *ibid.*, Jan. 19, 1909, p. 6, col. 6, and *Chicago Daily Socialist*, Nov. 23, 1908, p. 6, col. 1. Similar editorials appeared in St. Paul, Minn., *Daily News*, of Jan. 2, 1909, and St. Louis, Mo., *Star*, of Jan. 9, 1909.

²⁷*Chicago Daily Socialist*, Dec. 26, 1908, p. 3, col. 3.

several months into 1909. In early March, a petition to the United States Senate, signed by residents of nearly every state, asked that the Russian government be given notice of the treaty termination. The petition included a specific reference to procedures in the treaty that revealed "an embarrassing conflict of two standards of justice, Russian and American." The petition also noted that in extradition proceedings the accused were compelled to furnish proof of innocence; no provisions were made for bail; cases were not decided by a jury, but rather "by an inferior federal official, sometimes a lay magistrate, who may not even be learned in the law" (a pointed reference to Commissioner Foote, who was not a lawyer, but had risen to his position from a clerkship); Russia could base her demands on documents obtained in examinations during which the accused had no rights; and defense witnesses

were compelled on cross-examination to answer questions that "would betray their comrades . . . still within reach of the Czar's police."²⁸

Christian Ansoff Rudowitz's three-month ordeal was resolved on January 26, 1909, when Secretary of State Root overruled Commissioner Foote and refused to order the extradition. In communicating his decision to the Russian Ambassador in Washington, the Secretary explained that a careful review of the evidence had led him to the conclusion that Rudowitz's offenses were political in nature. Root added that however much the government of the United States might "deplore or condemn" acts of violence done for a political purpose, it had "no right to issue a warrant of extradition therefor."²⁹

The decision was greeted with widespread approval. Hyde declared that "law and justice still live in America"; Graham Taylor, writing in *Charities and the Commons*, described the ruling as "a great relief to all true Americans." The magazines *Outlook* and *The Public* endorsed the decision, and the *New York Times* commended its "justice and correctness."³⁰ The most enthusiastic reaction came from the *Chicago Daily Socialist*, the paper about which Rudowitz said upon his release from the Cook County Jail: "I know that unless it had taken up my cause I would now be in Russia, or beyond the grave."³¹ In an editorial of January 27 the *Daily Socialist* deemed Root's decision a "tremendous victory" in the ongoing war against tyranny.³²

Despite the attention the Rudowitz extradition case attracted at the time, over the years it

has been all but forgotten. In John Lewis Gaddis's recent survey of American-Russian relations, for example, the case receives no mention.³³ This circumstance is most unfortunate, for the case had important consequences in that it added to the antagonism with which a growing number of Americans viewed Russia during the decade preceding the collapse of the czarist autocracy. When the *Chicago Daily Socialist* referred to Nicholas II as an "arch-murderer" who was making Ivan the Terrible seem civilized in comparison, that paper was reflecting the attitude of many citizens, radicals and conservatives alike.³⁴ The Rudowitz case also made an important contribution to the successful 1911 public campaign for abrogating the 1832 Russo-American commercial treaty. That campaign was launched by Jewish organizations after the Roosevelt and Taft administrations failed to persuade the Russian government to abandon its discrimination against American Jews in Russia.³⁵

²⁸*New York Call*, March 5, 1909, p. 2, col. 5.

²⁹Root to Baron Roman R. Rosen, Jan. 26, 1909. National Archives, M862, Roll 968.

³⁰*Chicago Daily Socialist*, Jan. 27, 1909, p. 1, col. 5; Taylor, "The Rudowitz Case," *Charities and the Commons*, 21 (1909), 779; *The Outlook*, 91 (1909), 318; *The Public*, 12 (1909), 123; *New York Times*, Jan. 28, 1909, p. 8, col. 3.

³¹*Chicago Daily Socialist*, Jan. 28, 1909, p. 1, col. 7.

³²*Ibid.*, Jan. 27, 1909, p. 6, col. 1.

³³John Lewis Gaddis, *Russia, the Soviet Union and the United States* (New York: John Wiley and Sons, 1978).

³⁴*Chicago Daily Socialist*, Nov. 9, 1908, p. 1, col. 7.

³⁵Naomi W. Cohen, "The Abrogation of the Russo-American Treaty of 1832," *Jewish Social Studies*, 25 (1963), 3-41.