

was laid down that "if an armed enemy merchant vessel offers armed resistance . . . the crew are to be treated as prisoners of war" (and not to be shot).

No "franc-tireur" crime, whatever that is, exists at sea. Chief-Justice Marshall, of the United States, laid down the law that a belligerent vessel has a perfect right to arm in her own defence. The British Lord Stowell said that if the master of a merchant ship does his best to save his ship by gun-fire or otherwise, "no duty is violated by such act on his part. . . He may run from the sea-wolf, or he may, if he can, kill it." The principle was accepted by the German jurists Wehberg and Perels on the very eve of war.

The modern U.S. Naval War Code, Italian Code, and Russian Prize Regulations recognise the right of a merchantman to defend herself.—Pearce Higgins, *Armed Merchant Ships*, which contains a masterly summary of the law on the subject, and demolishes the German Admiralty's pretexts.

V.—GERMAN OUTRAGES IN THE UNITED STATES.

Levying of War in Neutral Countries on the Allies and on Subjects of those Neutral Countries, engaged in Legitimate Trade with the Allies.—The German and Austrian Embassies in the United States and their agents (1) paid for attacks on Canadian territory; thus the cheque