

Reply to Answer of United States of America

In reply to the answer of the United States of America to the claims of His Britannic Majesty's Government on behalf of the Schooners *Jessie*, *Thomas F. Bayard* and *Pescawha*, the allegations set out in the said claims are repeated, and it is submitted:

That the answer of the United States is merely a traverse of the allegations made in the memorial of His Britannic Majesty's Government.

That the statement that the masters of the vessels in question intended to proceed to the Russian Islands for sealing in the month of July, is erroneous. The fact is that the said vessels were, as already alleged, especially fitted out and manned for sea otter hunting, the owners being induced to do so on account of the operations of the two preceding years and the growing success of Japanese hunters on the same and neighbouring hunting grounds.

In this connection, attention is directed to the returns of sea otter captured, killed or taken by Japanese vessels, according to statistics taken from the official records at Tokio, for the years under-mentioned:

Year	Number of Skins
1906	69
1907	86
1908	82
1909	143
1910	146
1911	112
1912	401

The answer of the United States contains an accusation of fraudulent misrepresentation and concealment of material facts. This is denied, as the sources of information on which the facts stated in the memorial were based, were equally open to the United States. Further, it is denied that the masters made any such statement of their intention as alleged in the answer. On the contrary, the fact is, as indicated on oath by the masters, that the vessels were ordered to remain on the otter hunting grounds, where they were molested by the United States Revenue Cutter *Bear*, until the opening of the sealing season in Behring Sea, or longer if the results of the otter hunting proved favourable. This decision was arrived at on account of the results of the two previous years' hunting by the *Casco*, *Vera*,