

# Subjects, Citizens, and Aliens in a Time of Upheaval: Naturalizing and Denaturalizing in Europe during the First World War\*

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The First World War saw a dramatic increase in the involvement of civilians in the conflict, the introduction of new ways of managing people and populations, and a recasting of the relationship between the individual and the state. It also profoundly reshaped the rights of noncitizens. In particular, it called into question their right to move freely and to enjoy protection under international law, heightened their vulnerability, and increased their exposure to policies of discrimination, expulsion, deportation, internment, and forced migration.

Expulsion of migrants and their transformation into illegal aliens had already emerged at the beginning of the twentieth century as crucial tools in the state-driven redefinition of inclusion and exclusion.<sup>1</sup> The war and the Russian Rev-

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<sup>1</sup> Bernard Gainer, *The Alien Invasion: The Origins of the Aliens Act of 1905* (London, 1972); Frank Caestecker, "The Transformation of Nineteenth-Century West European Expulsion Policy, 1880–1914," in *Migration Control in the North Atlantic World: The Evolution of State Practices in Europe and the United States from the French Revolution to the Inter-War Period*, ed. Andreas Fahrmeir, Olivier Faron, and Patrick Weil (New York, 2003), 120–38; Mae M. Ngai, "The Strange Career of the Illegal Alien: Immigration Restriction and Deportation Policy in the United States, 1921–1965," *Law and History Review* 21, no. 1 (2003): 69–107; Paul-André Rosental, "Migrations, souveraineté, droits sociaux: Protéger et expulser les étrangers en Europe du XIXe siècle à nos jours," *Annales: Histoire, sciences sociales* 66, no. 2 (2011): 335–73; Christiane Reinecke, *Grenzen der Freizügigkeit: Migrationskontrolle in Grossbritannien und Deutschland, 1880–1930* (Munich, 2010); Patrick Weil, *The Sovereign Citizen: Denaturalization and the Origins of the American Republic* (Philadelphia, 2013).

olution radicalized the processes of exclusion that were already underway, but they went further by reshaping subjecthood and citizenship, giving them new meanings and boundaries, making it more difficult for individuals to be naturalized and easier for them to be denaturalized and rendered stateless, broadening the gap between citizens and foreigners, and establishing new forms of control on migration movements. The war and the revolution, however, not only triggered practices of exclusion but expanded internal citizenship as well. The mobilization of populations and national and imperial communities fueled expectations and promises of inclusion and anticipations of an enlargement of the boundaries of the political community to include usually marginalized groups like women and workers.<sup>2</sup>

And yet, these processes of inclusion proved to be effective only for some groups and individuals within the belligerent societies. In fact, as Mark von Hagen maintains, especially in multiethnic empires,

The politics of the Great War had as their consequences the narrowing of the choices available to many communities and the raising of the stakes for choosing or having attributed to them the “wrong” national identity. Within the cosmopolitan imperial elite themselves, the wartime policies and the ways in which the war inserted into other political conflicts had the effect of polarization along national lines. The result of these changes and the policies which shaped them was the politicization of ethnic differences and the overlaying of an ethnic or national dimension to many otherwise non-national political, economic, and social conflicts.<sup>3</sup>

The war, therefore, imposed markers of identity (nationality, language, religion, ethnicity, etc.) on people, often independently of their own choices, and crystallized ethnolinguistic attribution.<sup>4</sup> Furthermore, the combination of war and revolution made citizenship and rights heavily dependent on class, social discrimination, and political factors.<sup>5</sup> Yet throughout Europe there were millions

<sup>2</sup> Kathleen Canning, “Sexual Crisis and the Writing of Citizenship: Reflections on States of Exception in Germany, 1914–1920,” in *Staats-Gewalt: Ausnahmezustand und Sicherheitsregimes*, ed. Gadi Algazi, Alf Lüdtke, and Michael Wildt (Göttingen, 2008), 167–213. On the transformative effect of war and revolution in the former Russian Empire, see Eric Lohr, *Russian Citizenship: From Empire to Soviet Union* (Cambridge, MA, 2012), 128–31.

<sup>3</sup> Mark von Hagen, “The Great War and the Mobilization of Ethnicity in the Russian Empire,” in *Post-Soviet Political Order: Conflict and State Building*, ed. Barnett R. Rubin and Jack L. Snyder (London, 1998), 34–57, 37.

<sup>4</sup> Ibid. Also Gerald Stourzh, “Ethnic Attribution in Late Imperial Austria: Good Intentions, Evil Consequences,” in *The Habsburg Legacy: National Identity in Historical Perspective*, ed. Ritchie Robertson and Edward Timms (Edinburgh, 1994), 67–83.

<sup>5</sup> Golfo Alexopoulos, “Soviet Citizenship, More or Less: Rights, Emotions, and States of Civic Belonging,” *Kritika: Explorations in Russian and Eurasian History* 7, no. 3 (2006): 487–528, 488–89.

of people who had not perceived their nationality status as problematic until the outbreak of the war: people who were bilingual or multilingual, who lived transnational lives, who moved across class and social lines, who had married outside their national groups, and whose children, especially those born in a *jus soli* country such as Britain or France, were virtually dual nationals or could embrace a citizenship different from that of their parents.<sup>6</sup> These people either had to take sides by giving up national ambiguity or multiple citizenship, or they had to endure the stigma and the consequences of being part of a national collective body constructed and crystallized by the war or of a state entity in which obligations and rights depended heavily on political loyalty and accountability.

In this article I will deal with the impact of the First World War on the notion and practice of citizenship in France, Britain, Germany, the Russian Empire, the Austro-Hungarian Empire, the Ottoman Empire, and Italy, and on the relationship between these same belligerent states and the people living in their territories—both citizens and aliens. In particular, I shall focus on the ways in which, when faced with real or supposed security threats, governments of belligerent European countries not only mobilized populations along the member/nonmember divide but also redrew the boundaries between members and nonmembers and redefined the path to membership. The studies that have dominated the debate on this issue in the last three decades have not paid much attention to the role played by the war and the revolution in reshaping citizenship laws and practices or have considered it as a side issue. In contrast, I will try to demonstrate how bringing the war and the revolution back in is essential to overcome the classic distinction between *jus soli* and *jus sanguinis* and the sometimes too-Manichean divide between the assimilationist model and the ethnic one.<sup>7</sup> Policies of exclusion, even violent exclusion, coexisted with policies of inclusion—and it is more with exclusion that this article is concerned. Governments of warring countries adopted a mixture of not only expulsion, deportation/repatriation, internment, and denaturalization but also naturalization and forced incorporation, especially in occupied territories.

<sup>6</sup> *Jus soli* countries are those in which the citizenship of a child is mainly determined by the place of its birth. *Jus soli* is normally opposed to *jus sanguinis*, according to which a child's citizenship is determined by its parents' citizenship. The two systems are not mutually exclusive but may coexist.

<sup>7</sup> On these two models, see in particular Rogers Brubaker, *Citizenship and Nationhood in France and Germany* (Cambridge, MA, 1992). For a critique of Brubaker, see, among others, Dieter Gosewinkel, "Citizenship in Germany and France at the Turn of the Twentieth Century: Some New Observations on an Old Comparison," in *Citizenship and National Identity in Twentieth-Century Germany*, ed. Geoff Eley and Jan Palmowski (Stanford, CA, 2008), 27–39, and Andreas K. Fahrmeir, "Nineteenth-Century German Citizenships: A Reconsideration," *Historical Journal* 40, no. 3 (1997): 721–52.

Subjecthood, citizenship, and nationality are ambiguous words. Their ambiguity is increased and affected by the historical transformation that these words and concepts have undergone and by our contemporary vision of the meaning and reality of these terms.<sup>8</sup> Furthermore, the research of the last twenty years or so has tended to expand “the study of citizenship considerably beyond the nation-state to local publics and social protests, to the spheres of consumption and self representation, and the formation of individual and collective subjectivities.”<sup>9</sup> As recently noted by Patrick Weil, there are three dimensions that frequently recur in the study of citizenship: the legal, the political and civic, and the affective.<sup>10</sup> I will focus primarily on the legal dimension, that is, “the formal linkage of each individual” to the state (whether a nation-state or a multiethnic empire) “independently of an individual’s sense of belonging or degree of participation in national and patriotic institutions.”<sup>11</sup> However, as I will try to demonstrate, wartime’s mobilization of patriotism and nationalism made legal citizenship requirements contingent on origins, on the one hand, thus adding an “ethnic” dimension to citizenship, and contingent on loyalty, emotional attachment, and identification, on the other, thus creating an overlap between the affective and legal dimensions.<sup>12</sup>

Legal membership in a state did not entail identical duties and obligations in the countries considered in this article, nor identical rights. In fact, in the period under scrutiny, “the rights side of citizenship” was weak if not nonexistent in many countries—as in the Russian Empire<sup>13</sup>—but stronger in Britain, France, and Germany. Duties and rights depended heavily on religion and minority status as well as on gender and civil status. Citizenship, for example, did not have the same meaning and consequences for Jews and Christians in the Russian Empire or for Muslims and Christians in the Ottoman Empire. Nor did it have the same meaning for men and women all over the world. But after the war broke

<sup>8</sup> Pietro Costa, *Civitas: Storia della cittadinanza in Europa* (Rome, 1999–2001), vols. 3 and 4 in particular; Linda K. Kerber, “The Meanings of Citizenship,” *Journal of American History* 84, no. 3 (1997): 833–54; Dieter Gosewinkel, “Citizenship, Subjecthood, Nationality: Concepts of Belonging in the Age of Modern Nation States,” in *European Citizenship: Between National Legacies and Postnational Projects*, ed. Klaus Eder and Bernhard Giesen (Oxford, 2001), 17–35.

<sup>9</sup> Kathleen Canning, “Reflections on the Vocabulary of Citizenship in Twentieth-Century Germany,” in *Citizenship and National Identity*, 214–301, 215–16.

<sup>10</sup> Weil, *The Sovereign Citizen*, 5–6.

<sup>11</sup> *Ibid.* For a similar recent approach to this issue, see also Lohr, *Russian Citizenship*.

<sup>12</sup> In this article, *citizenship* and *subjecthood* (which is the term that better suits empires) are treated as synonyms, while *nationality*, especially when used in the context of multinational empires, indicates either “the status of belonging to a particular nation” or “an ethnic group forming a part of one or more political nations” (*Oxford English Dictionary*).

<sup>13</sup> Eric Lohr, “The Ideal Citizen and Real Subject in Late Imperial Russia,” *Kritika: Explorations in Russian and Eurasian History* 7, no. 2 (2006): 173–94, 181.

out, nationality overshadowed both rights and citizenship. Furthermore, it presupposed an exchange between the allegiance owed by the citizen to the state and the protection owed by the sovereign to his or her subjects (especially when abroad). Thus, establishing the rules of membership and drawing the boundaries between those who belonged and those who did not became increasingly important, particularly in countries that had experienced large immigration flows in the decades before the war or those in need of manpower.

This article, which is part of a larger comparative project on the treatment of aliens and enemy aliens during the First World War,<sup>14</sup> is divided into four sections. The first surveys the policies adopted by belligerent European countries against aliens, civilians of enemy nationality (enemy aliens), and citizens/subjects of enemy origin; the second and third concentrate on how states used naturalization and denaturalization to redefine membership and redraw the boundaries of belonging. The fourth section presents some tentative conclusions concerning the implementation of these policies, the individual reactions to them, the impact of the war on citizenship, and the consequences of the changes that took place during the war and in its aftermath.

#### I. ALIENS AND POPULATION POLICIES: ENEMY ALIENS AND THE STATE OF EMERGENCY

The war immediately had a strong impact on the lives of civilians. Civil liberties were heavily curtailed or suspended, especially for foreigners, and later in the war for religious or national minorities and in general all groups whose loyalty to the state was considered difficult to ascertain. Concerned with the security of the state and its citizens and obsessed with the idea that every stranger could be a spy or a saboteur, governments and armies sought to render harmless all persons with personal or family ties to an enemy country, on the presumption that they would necessarily be more loyal to their origins and blood than to the country in which they worked and lived. The war thus called the rights of foreigners and the duty of hospitality into question, reaffirmed in a brutal way the rights of the sovereign state over all the people living within its boundaries, and left to neutral powers—the United States of America (until roughly February 1917), Spain, Switzerland, Sweden, the Netherlands—the difficult task of protecting the rights of foreigners.<sup>15</sup>

<sup>14</sup> Daniela Luigia Caglioti, “Dealing with Enemy Aliens in WWI: Security versus Civil Liberties and Property Rights,” *Italian Journal of Public Law* 2, no. 2 (2011): 180–94.

<sup>15</sup> On the rights of foreigners and the duty of hospitality, see Elihu Root, “The Basis of Protection to Citizens Residing Abroad,” *American Journal of International Law* 4, no. 3 (1910): 517–28; Georg Cavallar, *The Rights of Strangers: Theories of Interna-*

In the last days of July and the first two weeks of August 1914, in almost all the countries that took part in the First World War, governments issued decrees and implemented measures dealing with aliens and civilians of enemy nationality who at the outbreak of the war happened to be in their respective territories. The first group affected was composed of the so-called “enemy aliens.” As their countries entered the conflict, German, Austro-Hungarian, and Ottoman and Bulgarian subjects domiciled in France, Britain, Russia, and all other countries that joined the alliance at different stages of the war were recast as dangerous, sometimes extremely dangerous, “enemies within,” regardless of their personal stories, feelings, ideas, loyalty, and sense of belonging. British, French, and Russian citizens (and later of course also citizens of Japan, Italy, Romania, Portugal, etc.) living in Germany, the Habsburg Empire, the Ottoman Empire, and Bulgaria were accorded the same treatment in those countries. These foreign subjects were in some cases transient tourists, students, or seasonal workers, but in most cases they had been residents of the belligerent countries for years. Some of them were even born in the country that now considered them enemies. Many had married a national; others had been naturalized or were in the process of obtaining a naturalization certificate; many owned houses, land, shares, bank accounts, or businesses; the majority had jobs or were self-employed and spoke the local language fluently.

All of the warring countries dealt with aliens and enemy aliens under the legal umbrella of the state of emergency provisions.<sup>16</sup> Between the end of July and the first week of August, governments (and sometimes armies) assumed full legislative powers<sup>17</sup> and issued orders in council or decrees that limited per-

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*tional Hospitality, the Global Community, and Political Justice since Vitoria* (Aldershot, 2002). On the diplomatic protection of citizens of an enemy state abroad during a war, see Edwin M. Borchard, *The Diplomatic Protection of Citizens Abroad* (New York, 1919), and William McHenry Franklin, *Protection of Foreign Interests: A Study in Diplomatic and Consular Practice* (Washington, DC, 1947).

<sup>16</sup> On state of emergency: Carl Schmitt, *Die Diktatur: Von den Anfängen des modernen Souveränitätsgedankens bis zum proletarischen Klassenkampf* (Munich, 1928), and Schmitt, *Politische Theologie: Vier Kapitel zur Lehre von der Souveränität* (Berlin, 1922); Clinton Rossiter, *Constitutional Dictatorship: Crisis Government in the Modern Democracies* (New York, 1963); Giorgio Agamben, *Stato d'eccezione* (Turin, 2003); John Ferejohn and Pasquale Pasquino, “The Law of the Exception: A Typology of Emergency Powers,” *International Journal of Constitutional Law* 2, no. 2 (2004): 210–39.

<sup>17</sup> On emergency powers in France and Britain, see Rossiter, *Constitutional Dictatorship*, 104–16 and 151–70. On France also, Pierre Renouvin, *Les formes du gouvernement de guerre* (Paris, 1925), 27–32, and Fabienne Bock, *Un parlementarisme de guerre, 1914–1919* (Paris, 2002). On Austria, see Josef Redlich, *Austrian War Government* (New Haven, CT, 1929), 77, 80, and Mark Cornwall, *The Undermining of Austria-Hungary: The Battle for Hearts and Minds* (New York, 2000), 18. On Germany,



sonal freedom, restricted or suspended civil and political liberties, and eventually curbed the economic activities of the civilians of enemy nationality and restrained their property rights.<sup>18</sup>

Once they had acquired emergency powers, governments strengthened their countries' legislation on aliens. Borders were sealed and reopened only occasionally for expulsions or to exchange prisoners by way of bilateral agreements. Foreigners, unless expelled or repatriated, could neither leave nor enter. Almost every belligerent imposed a ban on the departure of aliens while suppressing their freedom of movement within the country. Under these measures foreigners had to register and obtain residence permits, and if they lived in operation zones or areas considered war-sensitive they had to abandon their homes and live in designated areas. Often they were prohibited from owning cars, bicycles, and other means of transport or communication, and they were subjected to curfews. In France, for example, the president signed a decree on August 2, 1914, that compelled all aliens to apply for a residence permit. As a consequence, in Paris alone, the Prefecture de Police issued 157,822 such permits; 21,500 were temporarily granted to Germans and Austro-Hungarians. On August 15 new official instructions canceled the permits granted to enemy aliens, transforming them into hostages. A month later, a new decree ordered that all residence permits be revised and that a photograph be affixed to each. Thereafter, all aliens had to apply for authorization whenever they wanted to change domicile.<sup>19</sup> In the capital, the 21,500 permits granted to Germans and Austro-Hungarians at the beginning of August were canceled, and only 245 Germans and Austro-Hungarians and 680 French wives of Germans and Austro-Hungarians were able to obtain documents that allowed them to stay.<sup>20</sup> In Britain, the 1905 Aliens

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Albrecht Mendelssohn-Bartholdy, *The War and German Society: The Testament of a Liberal* (New Haven, CT, 1937), 108, and Gerald D. Feldman, *Army, Industry and Labor in Germany, 1914–1918* (Princeton, NJ, 1966), 27–38. On the Russian Empire, Eric Lohr, *Nationalizing the Russian Empire: The Campaign against Enemy Aliens during World War I* (Cambridge, MA, 2003), 17–20. On the Sublime Porte, Mustafa Aksakal, *The Ottoman Road to War in 1914: The Ottoman Empire and the First World War* (Cambridge, 2008), 105. On Italy, Carlotta Latini, *Governare l'emergenza: Delega legislativa e pieni poteri in Italia tra Otto e Novecento* (Milan, 2005), esp. 17–93.

<sup>18</sup> Uğur Ümit Üngör and Eric Lohr, "Economic Nationalism, Confiscation, and Genocide: A Comparison of the Ottoman and Russian Empires during World War I," *Journal of Modern European History* 12, no. 4 (2014): 500–22, and Daniela L. Caglioti, "Property Rights in Time of War: Sequestration and Liquidation of Enemy Aliens' Assets in Western Europe during the First World War," *ibid.*, 523–45.

<sup>19</sup> Henry Maunoury, *Police de guerre (1914–1919)* ([Paris], 1937), 24–26.

<sup>20</sup> *Ibid.*, 100. Among the 245 authorized people, there were sick people stranded in hospitals, people whose children were serving in the French army, and men serving in the French Foreign Legion. Residence permits were instead granted to 15,000 Alsatians and Lorrainians, 3,000 Czechs, 3,000 Poles, and 500 Italians-Slovenes (*ibid.*, 26).

Act was made more stringent on August 5, 1914, when the government introduced the Aliens Restriction Act, which allowed stricter control of all aliens, not only enemy aliens. Among other provisions, it covered movements in and out of the country, imposed compulsory registration, gave the government the power to deport aliens, and required aliens to live in designated areas.<sup>21</sup> Similarly, immediately after the war declaration, the Russian Empire government “banned the departure of enemy subjects and imposed control on their movement.”<sup>22</sup>

In Germany, starting on July 31, 1914, aliens were compelled to own a passport and to have it always on their person.<sup>23</sup> Britons were required to report daily to a police station and were subject to a curfew, while the Japanese who had not left via Switzerland after warnings from their embassy were imprisoned.<sup>24</sup> The German government also suspended payments of credits and pensions to foreigners. This provision severely affected neutral aliens, such as Spaniards, and left more than three thousand Russian subjects without any means.<sup>25</sup> The interior ministry was particularly concerned with Russians who were in the eastern part of the country and who could have left to avoid enlistment in their own army. All these people, especially the many seasonal workers from Russian Poland, had to be put under special surveillance.<sup>26</sup> The prewar policy of mandatory rotation of seasonal workers was transformed. With the aim of meeting the country’s military and economic needs, a ban on the departure of these Russian-Polish agricultural workers was introduced in October 1914, and a similar ban concerning industrial workers was issued in December 1914.<sup>27</sup>

In Austria-Hungary, a new regulation on passports and safe-conduct passes in the war zone was issued in August 1914.<sup>28</sup> Not only aliens but also subjects had to apply for authorization to travel. A newly created military bureaucracy, the Kriegsüberwachungsamt (KÜA), was entrusted with the supervision of all requests to travel, permits to stay, changes of residence, and enemy aliens in general.<sup>29</sup> As far as enemy aliens were concerned, between July 30 and August 12,

<sup>21</sup> J. C. Bird, *The Control of Enemy Alien Civilians in Great Britain, 1914–1918* (New York, 1986), 14–44.

<sup>22</sup> Lohr, *Russian Citizenship*, 119.

<sup>23</sup> Reinecke, *Grenzen*, 226.

<sup>24</sup> James W. Gerard, *My Four Years in Germany* (New York, 1917), 155.

<sup>25</sup> Bundesarchiv, Berlin-Lichterfelde (hereafter BAB), R901/82912, the Spanish ambassador to the German Ministry of Foreign Affairs, August 9, 1914.

<sup>26</sup> *Ibid.*, “Über die Behandlung russischer Saisonarbeiter . . .,” August 7, 1914.

<sup>27</sup> Ulrich Herbert, *A History of Foreign Labor in Germany, 1880–1980: Seasonal Workers, Forced Laborers, Guest Workers* (Ann Arbor, MI, 1990), 87–102.

<sup>28</sup> Redlich, *Austrian War Government*, 78.

<sup>29</sup> On the KÜA, Tamara Scheer, *Die Ringstrassenfront: Österreich-Ungarn, das Kriegsüberwachungsamt und der Ausnahmezustand während des Ersten Weltkrieges* (Vienna, 2010).



1914, the KÜA issued numerous instructions targeting Serbians, Russians, Montenegrins, and French, respectively. The circulars established that enemy aliens liable to be called for military duty were to be arrested and considered prisoners of war.<sup>30</sup> At the same time, the ministry of foreign affairs tried to reassure the US embassy, which was in charge of French and British diplomatic interests, by sending a detailed memorandum on the fate of French and British subjects within the borders of the Dual Monarchy. The document stated that women and children were free to leave the country if they wished, while certain other categories of people were either to be placed under special surveillance in their places of residence, confined to designated towns or areas, or interned in camps. The majority of foreigners (French and British in particular) remained at liberty in the first months of the war, even though they had to report to the police. Notwithstanding the guarantees offered by the ministry of foreign affairs, however, people who were believed to be difficult to control or “of more than doubtful trustworthiness” were arrested and interned.<sup>31</sup>

In the Ottoman Empire, the announcement on September 9, 1914, that the government was ready to abolish the capitulations (a special regime of privileges for foreigners) accelerated the departure of foreigners.<sup>32</sup> But when, on October 30, the Ottomans declared war on France and Britain, “thousands of enemy subjects were [still] living in the Ottoman Empire,”<sup>33</sup> among them many priests, nuns, and “Levantines.”<sup>34</sup> In Smyrna alone there were 1,800 Bri-

<sup>30</sup> See telegrams and circulars in Österreichisches Staatsarchiv, Haus-, Hof-, und Staatsarchiv, Vienna, Ministerium des Äußern, Administrative Registratur, F36–582.

<sup>31</sup> *Ibid.*, memorandum to the American Embassy, September 5, 1914. According to this memorandum, in Vienna, in the first month of the war, the police arrested sixty-one Frenchmen and eighty-seven Englishmen out of a population of 1,300 and 1,254, respectively.

<sup>32</sup> Abrogation occurred on October 1, 1914. Ahmet Emin Yalman, *Turkey in the World War* (New Haven, CT, 1930), 113–16; Erik-Jan Zürcher, *Turkey: A Modern History* (London, 2004), 125. On capitulations, see Nasīm Sousa, *The Capitulatory Régime of Turkey, Its History, Origin, and Nature* (Baltimore, MD, 1933), and Maurits H. van den Boogert, *The Capitulations and the Ottoman Legal System: Qadis, Consuls, and Beraths in the 18th Century* (Leiden, 2005).

<sup>33</sup> Henry Morgenthau, *Ambassador Morgenthau's Story* (Garden City, NY, 1918), 130.

<sup>34</sup> Morgenthau defined the Levantines as follows: “nearly all had been born in Turkey and in many cases their families had been domiciled in that country for two or more generations. The retention of their European citizenship is almost their only contact with the nations from which they have sprung. Not uncommonly we meet in the larger cities of Turkey men and women who are English by race and nationality, but who speak no English, French being the usual language of the Levantine. The great majority have never set foot in England, or in any other European country; they have only one home, and that is Turkey” (*ibid.*, 233).

tons and 4,000 French.<sup>35</sup> Too busy with the persecution of its own internal enemies—Christians in general and the Armenians above all—the Committee of Union and Progress (CUP) government did not devise a clear policy in regard to these alien subjects: “Now and then, the Turkish officials would retaliate upon one of their enemy aliens, usually in reprisal for some injury, inflicted on their own subjects in enemy countries.”<sup>36</sup> For many enemy aliens, the possibility of leaving the country and not ending up as hostages or military targets depended on the negotiating ability of US ambassador Henry Morgenthau Sr., or of the Apostolic delegate, the Cardinal Angelo Maria Dolci.<sup>37</sup> The former was entrusted with the protection of French, British, Serbian, and Belgian (later also Italian) subjects. After wearisome negotiations he was able to organize the departure of some of them, but he could not prevent foreign schools, monasteries, and churches from being sequestered nor protect the three thousand enemy aliens left in Constantinople from experiencing various forms of abuse.<sup>38</sup>

In Italy, a decree issued on May 2, 1915, three weeks before the country entered the war, prevented foreigners from entering the country without a passport and a visa. It also required all aliens, both in transit and residing on Italian territory, to register; compelled employers to notify the government of the hiring of foreigners; ordered landowners to communicate the sale of urban or rural estates to foreigners; and instructed hotels to declare the presence of aliens.<sup>39</sup>

Once the freedom of departure or migration had been severely restricted, aliens could move only if they possessed passports and followed various cumbersome bureaucratic procedures. For enemy aliens departure was possible only through bilaterally negotiated exchanges and the humanitarian actions that were mostly promoted by the International Committee of the Red Cross (ICRC) or the Vatican.<sup>40</sup>

The provisions aimed at controlling foreigners were accompanied by measures targeted specifically at enemy aliens, culminating with internment in concentration camps<sup>41</sup> often accompanied by forced labor. Each country combined, in dif-

<sup>35</sup> Archives Diplomatiques, France—Paris, La Courmeuve, *Correspondance Politique et Commerciale* (hereafter ADF, CPC), 938, copy of a letter of George Horton, the US consul general, to the State Department, November 6, 1914.

<sup>36</sup> Morgenthau, *Ambassador Morgenthau's Story*, 254.

<sup>37</sup> On Dolci's activity in favor of enemy aliens and Christian subjects of the Ottoman Empire, see the correspondence in Archivio Segreto Vaticano, Città del Vaticano, Archivio della Delegazione Apostolica in Turchia (Mons. Angelo Maria Dolci, 1914–23), boxes 97, 99, 100–106.

<sup>38</sup> Morgenthau, *Ambassador Morgenthau's Story*, chaps. 12 and 13.

<sup>39</sup> Daniela L. Caglioti, “Why and How Italy Invented an Enemy Aliens Problem in the First World War,” *War in History* 21, no. 2 (2014): 142–69, 147.

<sup>40</sup> Annette Becker, *Oubliés de la grande guerre* (Paris, 1998).

<sup>41</sup> Concentration camp (*camp de concentration* in French, *Konzentrationslager* in German) was the standard term used to designate the sites where enemy civilians were kept

ferent proportions, expulsion, repatriation/deportation, displacement, and above all internment of enemy nationals (primarily, but not exclusively, men aged between fifteen and forty-five to fifty-five, according to each country's legislation on conscription). In order to make the state of emergency more effective, nearly all countries neutralized the judiciary by forbidding aliens and enemy aliens to bring suit before the courts. Enemy aliens and denaturalized persons were thus rendered entirely powerless and at the mercy of the public authorities.

Internment, at least internment on such a large scale, was a novelty for Europe. Notwithstanding the many protests of international humanitarian organizations such as the Red Cross,<sup>42</sup> concentration camps for civilians were opened almost everywhere, first in Europe and then in the United States, Brazil, the colonies and dominions of the British Empire, China, the French colonies, and occupied territories. Whether or not of arms-bearing age, civilians of enemy nationality experienced confinement in isolated and uncomfortable locations where they had to report daily to the local police; some were even subjected to the extreme hardship and boredom of internment in concentration camps, sometimes for the entire war. Belligerent countries interned at least four hundred thousand enemy aliens.<sup>43</sup> The internment of civilians of enemy nationality started immediately. Britain interned in concentration camps more than thirty-two thousand German and Austro-Hungarian subjects (over fifty thousand if we include those held in captivity in colonies and dominions)<sup>44</sup> and France around sixty thou-

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in captivity during the war. It translated into English the Spanish word *reconcentrados*, which indicated the internment camps in Cuba during the Ten Years' War (1868–78) and again in the 1895–98 war. It was then largely used to denote the camp system during the Anglo-Boer War (1899–1902). See Jonathan Hyslop, "The Invention of the Concentration Camp: Cuba, Southern Africa and the Philippines, 1896–1907," *South African Historical Journal* 63, no. 2 (2011): 251–76; Iain R. Smith and Andreas Stucki, "The Colonial Development of Concentration Camps (1868–1902)," *Journal of Imperial and Commonwealth History* 39, no. 3 (2011): 417–37. See also Robert Gerwarth and Stephan Malinowski, "Hannah Arendt's Ghosts: Reflections on the Disputable Path from Windhoek to Auschwitz," *Central European History* 42, no. 2 (2009): 279–300, on the controversial continuity between colonial violence and genocide in Europe.

<sup>42</sup> Matthew Stibbe, "The Internment of Civilians by Belligerent States during the First World War and the Response of the International Committee of the Red Cross," *Journal of Contemporary History* 41, no. 1 (2006): 5–19.

<sup>43</sup> Richard B. Speed III, *Prisoners, Diplomats, and the Great War: A Study in the Diplomacy of Captivity* (New York, 1990), 141. Matthew Stibbe has explored this subject in depth; see in particular "Civilian Internment and Civilian Internees in Europe, 1914–20," *Immigrants and Minorities* 26, nos. 1–2 (2008): 49–81.

<sup>44</sup> For Britain: Panikos Panayi, *The Enemy in Our Midst: Germans in Britain during the First World War* (Oxford, 1991), 70–98; for colonies and dominions, see the data on German civilian internees published by the Prussian War Ministry: "Die Zivil- und Kolonialgefangenen," in *Das Werk des Untersuchungsausschusses: 1919–1928*, 3rd ser., ed. Deutscher Reichstag, vol. 3, no. 2 (Berlin, 1927), 820–22. To these data one must

sand.<sup>45</sup> Germany, which started to imprison British and French male subjects resident in its territory as a retaliation measure, ended up by interning more than one hundred thousand enemy civilians (among them also women, children, and elderly people), mainly French and Belgians deported from occupied regions but also persons of Russian, Polish, Rumanian, or US nationality.<sup>46</sup> In the Russian Empire, fifty thousand enemy aliens were interned, and more than twenty-five hundred thousand were deported.<sup>47</sup> In the Habsburg Empire, enemy aliens were destined, depending on their nationality and their social status, either to confinement or to internment. While British and French residents were expelled from the cities and confined to small, remote villages where they could be more easily controlled, Austro-Hungarians resorted to internment behind barbed wire for subjects of the monarchy living in frontier areas, such as the Italians, Ruthenians, or Serbs. Around twenty-eight thousand Italians and Italian-speaking Habsburg subjects and at least four thousand suspected “Russophiles” from Galicia and Bukovina were interned.<sup>48</sup> Italy adopted a milder policy of confinement. Austro-Hungarian subjects were the first to be affected by this policy and were confined in Sardinia, together with “dangerous” Italian citizens: anarchists, socialists, and “austriacanti” (persons suspected of being in favor of Austria-Hungary). According to a range of calculations, between 2,226 and 5,000 persons spent part or all of the war in tiny villages in Sardinia. Later in the war, the few Germans who had remained on Italian territory were also confined in central and southern Italian small towns or islands.<sup>49</sup>

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add the Austro-Hungarians. In Canada about 5,000 Ruthenians from Habsburg Galicia were interned: Lubomyr Luciuk, *In Fear of the Barbed-Wire Fence: Canada's First National Internment Operations and the Ukrainian Canadians, 1914–1920* (Kingston, 2001).

<sup>45</sup> According to the estimate by Jean-Claude Farcy, *Les camps de concentration français de la première guerre mondiale (1914–1920)* (Paris, 1995), 129.

<sup>46</sup> BAB, R901/82913, “Deutsche Retorsionsmassnahmen gegen feindliche Länder,” *Norddeutsche allgemeine Zeitung*, November 9, 1914; Fréd Blanchod and Félix Speiser, *Rapport de MM. les Drs Blanchod & Speiser sur les visites aux camps et chantiers de travail des prisonniers français en Allemagne, en Mars et Avril 1916* (Geneva, 1916); Christoph Jahr, “Zivilisten als Kriegsgefangene: Die Internierung von ‘Feindstaaten-Ausländern’ in Deutschland während des Ersten Weltkriegs am Beispiel des ‘Engländerlagers’ Ruhleben,” in *In der Hand des Feindes: Kriegsgefangenschaft von der Antike bis zum Zweiten Weltkrieg*, ed. Rüdiger Overmans (Cologne, 1999), 297–321, 315–16; Kenneth Steuer, *Pursuit of an “Unparalleled Opportunity”: The American YMCA and Prisoner of War Diplomacy among the Central Power Nations during World War I, 1914–1923* (New York, 2008), chap. 14, suggests the number of 3,602 US internees.

<sup>47</sup> Lohr, *Nationalizing*, 123 and 127.

<sup>48</sup> Matthew Stibbe, “Enemy Aliens, Deportees, Refugees: Internment Practices in the Habsburg Empire, 1914–1918,” *Journal of Modern European History* 12, no. 4 (2014): 479–99.

<sup>49</sup> Giovanna Procacci, “L’internamento di civili in Italia durante la prima guerra mondiale: Normativa e conflitti di competenza,” *Dep Deportate, esuli, profughe: Rivista telematica di studi sulla memoria femminile*, nos. 5/6 (2006): 33–66, and Caglioti, “Why and How,” 163–65.

As the war proceeded, the treatment of enemy aliens became more differentiated as some alien civilians were subjected to more detailed regulations and others were categorized as protected foreigners. Some belligerent countries granted exemptions to specific nationalities, thus transforming enemy aliens into friendly aliens. Some Alsations and Lorrainians, Poles, Czechs, and Czech-Slovaks received better treatment in France, Britain, and Italy on the presumption that they belonged to groups that were “enemies of our enemies” and “compatriots of those who are fighting for us in other places,” as British Home Secretary Sir George Cave put it.<sup>50</sup> In France exemptions also involved Jews “from the Levant,” Syrians, and Armenians,<sup>51</sup> while in Italy the government also gave immunity to Bulgarians and in general to the vague category of “Ottoman subjects of non-Turkish nationality.”<sup>52</sup> More or less the same categories of enemy subjects—Alsations and Lorrainians, Poles, Czechs, Slovaks, Serbs, Ottoman Christians, and Austro-Hungarian Italian-speaking subjects—were “granted full exemption from all sanctions” in the Russian Empire as well.<sup>53</sup> In Britain another set of exemptions concerned enemy aliens in a bad health; “persons of enemy nationality who were doing . . . work from which by reason of their special skill they could not well be spared”; some women who had become enemy aliens by marriage;<sup>54</sup> and “enemy aliens who had their roots” in the country.<sup>55</sup>

On the other hand, governments, armies, and parliaments had to deal with the varied and growing anxieties of their constituencies regarding friendly and neutral aliens, as well as new waves of antisemitism. Public opinion and the nationalistic press became obsessed with foreigners who spoke the language of the enemy: German-speaking Swiss experienced great difficulty in France or Italy,<sup>56</sup> for example, while US citizens, being English-speaking, endured hardship in Germany and Austria-Hungary. They were obsessed too with aliens who looked like the enemy (e.g., the Chinese in Germany, who always had to have with them a passport with a German stamp that helped distinguish them from the Japa-

<sup>50</sup> Hansard’s Parliamentary Debates, House of Commons (hereafter *Hansard*, HCD), “Sir G. Cave’s Statement,” July 11, 1918, 108:527.

<sup>51</sup> Maunoury, *Police de guerre*, 26–27. On the privileged Ottoman subjects and in particular on Ottoman Jews, see Sarah Abrevaya Stein, “Citizens of a Fictional Nation: Ottoman-born Jews in France during the First World War,” *Past & Present*, no. 226 (2015): 227–54.

<sup>52</sup> Edouard Clunet, “L’interdiction de commerce avec le sujets ennemis devant le Parlement,” *L’information*, January 29 and 30, 1915. For Italy, *Gazzetta ufficiale*, Decreto Luogotenenziale no. 1755, November 25, 1915, and no. 103, January 30, 1916; DL no. 320, March 12, 1916.

<sup>53</sup> Lohr, *Russian Citizenship*, 126, 131.

<sup>54</sup> At the time, a woman who married a foreigner assumed the nationality of her husband almost automatically and universally. See Helen Irving, *Citizenship, Alienage, and the Modern Constitutional State: A Gendered History* (Cambridge, 2016).

<sup>55</sup> “Sir G. Cave’s Statement,” 108:525.

<sup>56</sup> On the Swiss in Italy, see Caglioti, “Why and How,” 149, 151–52.

nese<sup>57</sup>); with recently as well as less recently naturalized people of enemy origin;<sup>58</sup> with people who either bore an enemy name or had only recently changed it;<sup>59</sup> and with Jews, in particular Russian Jews, who were accused of unpatriotic behavior in having failed to come back to their country of origin to enlist,<sup>60</sup> or whose loyalty as “friendly aliens” was questioned after the 1917 revolution.<sup>61</sup>

In order to respond to these concerns, governments of belligerent countries extended the measures they had adopted to deal with enemy aliens to apply to aliens of all kinds—friendly and neutral as well as enemy aliens. Britain took the lead. The Aliens Restriction Act issued on August 5, 1914, gave the king the power to impose restrictions of various kinds on any foreigner. The government made extensive use of this power, and in the spring of 1916 it introduced registration for all aliens and an identity book for those who wanted to access prohibited areas. The problem of identifying aliens and the need to trace their movements and control them more stringently remained at the center of the parliamentary debate in Britain in 1917 and 1918, particularly in the days before the issue of amendments to the British Nationality and Status of Aliens Act.<sup>62</sup> However, the attempt to introduce a general national register of the entire population was doomed to failure, both because of a lack of political consensus and support, as it was seen as a prelude to conscription, and because it was seen as an “unnecessary and costly bureaucracy, which interfered with the liberty of the individual.”<sup>63</sup>

Similar provisions soon spread in neutral countries such as Switzerland (1917) and the Netherlands (1918),<sup>64</sup> as well as outside Europe, where countries

<sup>57</sup> BAB, R901/83618, Chinese Embassy to the German Ministry of Foreign Affairs, December 9, 1914.

<sup>58</sup> On this see Section II of this article.

<sup>59</sup> “Sir G. Cave’s Statement,” 108:530–31.

<sup>60</sup> On Russian Jews in Britain, see David Cesarani, “Anti-Alienism in England after the First World War,” *Immigrants and Minorities* 6, no. 1 (1987): 5–29. On the situation of Russian Jews in France, see the report of a commission headed by Emile Durkheim in Elkarati Nourredine, “Emile Durkheim, défenseur des réfugiés russes en France: Rapport sur la situation des russes du département de la Seine,” *Genèses*, no. 2 (1990): 168–77; Philippe-E. Landau, “Les Juifs russes à Paris pendant la Grande Guerre, cibles de l’antisémitisme,” *Archives Juives* 34, no. 2 (2001): 43–56.

<sup>61</sup> Sharman Kadish, “Bolsheviks and British Jews: The Anglo-Jewish Community, Britain and the Russian Revolution,” *Jewish Social Studies* 50, nos. 3/4 (1988): 239–52, 243.

<sup>62</sup> In one of these debates, the British home secretary proposed to “make that system [the identity book] universal, so that every alien must have his identity book and can be challenged or called upon to show it.” “Sir G. Cave’s Statement,” 108:533–34.

<sup>63</sup> Rosemary Elliot, “An Early Experiment in National Identity Cards: The Battle over Registration in the First World War,” *Twentieth Century British History* 17, no. 2 (2006): 145–76, esp. 175.

<sup>64</sup> Frank Caestecker, “The Changing Modalities of Regulation in International Migration within Continental Europe,” in *Regulation of Migration: International Experiences*, ed. Anita Böcker et al. (Amsterdam, 1998), 73–98, 76.



such as New Zealand (1917) and Japan introduced compulsory registration for aliens and other regulations concerning population movements (January 1918). In April 1917, the French government issued two decrees that introduced a special identity card for aliens.<sup>65</sup> The purpose of the decrees was to facilitate the identification of foreigners, above all of enemy aliens, and to aid in the process of revising the residence permits granted since the outbreak of the war—a process that included rewarding with a residence permit certain categories of foreigners who deserved to be protected because of their loyalty and attachment to France.<sup>66</sup> By May 30, 1918, 140,252 persons had requested identity cards in Paris and the surrounding region. Only a small portion of them were citizens of enemy countries (1,983 individuals); more numerous were those who belonged to protected categories even though they came from enemy countries: 4,505 Poles, 743 Czechs, 445 Syrians, 995 Armenians, 375 Greeks “du Levant,” and 1,688 “Israélites du Levant.”<sup>67</sup>

## II. WARTIME NATURALIZATION POLICIES

If enemy aliens generated a lot of anxiety, a parallel and even more irrational and exaggerated fear arose about naturalized people of enemy origin, and in particular those recently naturalized, or those who had changed their names. This fearfulness revealed the widespread “tendency to consider allegiance acquired at birth more reliable than citizenship acquired by naturalization . . . or marriage.”<sup>68</sup> The nationalistic press and nationalistic circles considered naturalization and change of name to be strategies of disguise that were particularly dangerous because they had been planned in advance. Patriots and hardline politicians feared that enemies could make use of new names that sounded characteristic of their country of residence to spy and organize sabotage. Even though not all governments and policy makers shared this conviction, naturalizations were suspended or banned almost everywhere as a preventative measure.

With the important exception of Germany, where the “wartime naturalization policy was . . . more generous than it had been in peacetime,”<sup>69</sup> after the outbreak

<sup>65</sup> See Gérard Noiriel, *La tyrannie du national: Le droit d'asile en Europe, 1793–1993* (Paris, 1991), 177–80; Claire Zalc, *Melting shops: Une histoire des commerçants étrangers en France* (Paris, 2010), 51–52.

<sup>66</sup> ADF, CPC, 1895–1940, C-Administrative 27CPCOM, 258, “Note pour la Direction des affaires politiques et commerciales,” September 2, 1916.

<sup>67</sup> *Ibid.*, “État des étrangers résident dans le Département de la Seine ayant sollicité l'obtention d'une carte d'identité,” May 30, 1918; Belgians, Italians, Swiss, Russians, Britons, and Spaniards were the most widely represented groups.

<sup>68</sup> Andreas Fahrmeir, *Citizenship: The Rise and Fall of a Modern Concept* (New Haven, CT, 2007), 120–21.

<sup>69</sup> *Ibid.*, 121.

of the war the number of granted certificates dropped dramatically in countries that initially had adopted neither a ban nor specific regulations on the issue. In Britain, France, the Russian Empire, and Italy, new rules and a change in the attitude of officials and public opinion made it harder to change nationality or acquire a new one.

In nineteenth-century Europe, the number of naturalizations had risen in connection with imperial ambitions and territorial changes, such as those caused by the Italian wars of independence or the German wars of unification, and with the plebiscites or treaties that regulated the right of people living in borderlands affected by territorial changes to opt for one citizenship or another.<sup>70</sup> Changes in citizenship laws—the 1870 British naturalization statute or the introduction of the *jus soli* and the double *jus soli* in France in 1889,<sup>71</sup> to cite only two examples—had further modified the citizen/noncitizen divide, also increasing the opportunity for people with non-native parents to gain the status of nationals. However, for the majority of migrants, naturalization remained the only legal and transparent procedure by which to acquire a new citizenship status.

There are few reliable statistics, but the available data show that in the decade preceding the war the number of naturalizations granted had not been particularly high, suggesting that only a few migrants were interested in changing their nationalities, or that only a few of them were allowed to do so.<sup>72</sup> In Britain, an average of 1,036 naturalizations per year had been granted between 1904 and 1913

<sup>70</sup> I am thinking in particular of the treaties that regulated the transfer of the sovereignty of Nice and Savoy in 1859, of Schleswig-Holstein in 1864, and of Alsace and Lorraine in 1871.

<sup>71</sup> Double *jus soli* means awarding citizenship at birth to children with at least one parent who was born in the state, although of foreign nationality. See Patrick Weil, *Qu'est-ce qu'un français? Histoire de la nationalité française depuis la Révolution* (Paris, 2004), 78–85.

<sup>72</sup> The data used in this article come from official statistics and publications or from secondary literature (references are given in the appropriate footnotes). Their level of detail and accuracy depends on each country's legislation and the attitude of their bureaucracy. For example, British returns listed naturalized people by name, former nationality, and place of residence in annual reports, while French individual data are scattered and difficult to process, although there are statistics available in an aggregated form. The statistics are not always comparable. The British ones, for example, underestimated the number of naturalized people because they did not, especially before the war, include foreign-born wives and children who enjoyed a derivative citizenship. French statistics, in contrast, include women (and list children as dependents), but they do not explain whether they were the wives of the naturalized or whether they were nonmarried individuals petitioning only for themselves. Data on requests and application rejections are even fewer. For Britain, see Benno Gammerl, *Staatsbürger, Untertanen und Andere: Der Umgang mit ethnischer Heterogenität im Britischen Weltreich und im Habsburgerreich 1867–1918* (Göttingen, 2010), 227–28.

(33 percent to people of German or Austro-Hungarian origin).<sup>73</sup> In the same period in France the figures were higher, although much smaller than the number of migrants who regularly entered the country: there were on average 2,941 naturalizations per year (a figure that rises to 4,320 if we add the foreign-born children of the naturalized) out of a foreign population that had reached 1,160,000 by the 1911 census.<sup>74</sup> In fact, as demonstrated by Patrick Weil, France was fully engaged in the integration of the second generation after the reform of the citizenship law in 1889; it paid less attention to first-generation immigrants, even those who had arrived decades earlier.<sup>75</sup> Italy, a country of emigration, had granted only ninety-two naturalizations per year between 1899 and 1911.<sup>76</sup> By contrast, between 1885 and 1903 Austria-Hungary granted an average of 3,354 naturalizations per year.<sup>77</sup> And Prussia, which had started in the decade between 1895 and 1905 to transform itself into an immigration country,<sup>78</sup> registered an average of 8,984 naturalizations per year from 1909 to 1911 out of a foreign population of 688,839 in 1910.<sup>79</sup> However, the number of naturalizations did not compensate for the number of German migrants who, thanks to the ten-years-residence-abroad rule, had lost their Prussian citizenship in the previous decades.<sup>80</sup>

There are many reasons for the low rate of naturalization and for the fact that the rate was so diverse among these countries. There were not many incentives to naturalize. In peacetime, foreigners enjoyed both full legal rights and exemp-

<sup>73</sup> “Summary of the Certificates Registered at the Home Office in each year from 1904 to 1913 Inclusive,” in Parliamentary Papers, House of Commons, *Aliens (naturalization): Return showing the names of all aliens to whom certificates of naturalization of re-admission to British nationality have been issued and whose oaths of allegiance have, during the year ended the 31st day of December 1914, been registered at the Home Office, giving the country and place of residence of the person naturalized or re-admitted, and including information as to any aliens who have, during the same period, obtained acts of naturalization from the legislature . . . dated 24 April 1914* (London, 1914) (hereafter PP, HC/ANR), 1914 (206), 52. The average calculations are mine and are always given in round numbers. Since the figures are very small, I did not round them up to the nearest one hundred or one thousand.

<sup>74</sup> *Les naturalisations en France (1870–1940)* (Paris, 1942), 24. Weil, *Qu’est-ce qu’un français?*, 102, for the number of foreigners.

<sup>75</sup> Weil, *Qu’est-ce qu’un français?*, 93 and 98–102.

<sup>76</sup> Vito Francesco Girona, *Die Politik der Staatsbürgerschaft: Italien und Deutschland im Vergleich 1800–1914* (Göttingen, 2010), 277.

<sup>77</sup> Gammerl, *Staatsbürger*, 82.

<sup>78</sup> Dieter Gosewinkel, *Einbürgern und Ausschliessen: Die Nationalisierung der Staatsangehörigkeit vom Deutschen Bund bis zur Bundesrepublik Deutschland* (Göttingen, 2001), 185.

<sup>79</sup> *Ibid.*, 242 n. 222. According to Dieter Gosewinkel’s estimate, more than 120,000 naturalizations (an average of 6,350 per year) occurred from 1896 to 1914. Prussia accounted for 60–62.4 percent of Germany’s entire population.

<sup>80</sup> *Ibid.*, 241. Gosewinkel calculated that there were five times more denaturalizations than naturalizations in the decade 1872–82.

tion from military service in the majority of the countries under examination in this article, and there was a deterrent effect from the bias against dual citizenship that made it difficult for naturalized citizens to retain their former citizenship. The different regulations on migrant mobility in different countries and the diverse regimes of expulsion and deportation must also have affected the difficult and nonreversible decision of whether or not to apply for naturalization, embrace a new nationality, and risk being drafted. Before the First World War, securing citizenship status was certainly more necessary for migrants in countries with higher rates of expulsion and deportation, such as Prussia, than it was in France or Britain, where children of migrants were considered natives when born in the country.<sup>81</sup> Naturalization procedures also entailed costs that could prove prohibitive for poor migrants, among them the many Jews coming from Eastern Europe—as, for example, in Britain, where after 1880 the fee rose from one to five pounds sterling, plus a stamp duty of 1.5s.;<sup>82</sup> France, where people had to pay 175.25 francs as “droits de sceau”; or the Ottoman Empire, where Russian Jews were required to pay 40 francs per capita, a sum considered “high” and “impossible” to pay.<sup>83</sup> Furthermore, this low rate of naturalizations, especially if compared with the far higher rate of naturalization in countries such as the United States, can be explained by the larger presence in Europe of short-distance, seasonal, and temporary migrants.

When war broke out, almost all pending applications were frozen. In France, naturalizations dropped to 2,117 in 1914 from 3,447 in 1913 and then ceased entirely; naturalizations on the basis of the civil code resumed only after June 28, 1919.<sup>84</sup> Britain did not officially ban naturalization but granted certificates at a much slower pace than in the prewar years; the government rejected almost all applications received from Germans who were longtime British residents and “postponed indefinitely” those filed by Russians and Poles.<sup>85</sup> Naturalizations had reached a peak of 1,709 in 1913; thereafter they dropped to 1,211 in 1914 (with only 347 new certificates granted after the outbreak of the war),<sup>86</sup> 983 in 1915, 571 in 1916, 245 in 1917, and 269 in 1918.<sup>87</sup> With the war, the divergence in nat-

<sup>81</sup> Caestecker, “The Transformation”; Reinecke, *Grenzen*; Rosental, “Migrations.”

<sup>82</sup> J. M. Ross, “Naturalization of Jews in England,” *Transactions & Miscellanies (Jewish Historical Society of England)* 24 (1970–73): 59–62, 67; Gainer, *The Alien Invasion*, 55. Starting with February 26, 1913, the fee was lowered to £3, but raised to £10 in 1920. See National Archives, London (hereafter TNA), HO 45/12183.

<sup>83</sup> For France, see Weil, *Qu’est-ce qu’un français?*, 86; for the Ottoman Empire, see Library of Congress, Washington, DC, Henry Morgenthau’s Papers, Correspondence (hereafter LoC, HMP-C), Ruppin to Morgenthau from Jaffa, November 27, 1914, container 7.

<sup>84</sup> *Les naturalisations en France (1870–1940)* (Paris, 1942), 23–24.

<sup>85</sup> Charles Edward Troup, *The Home Office* (London, 1925), 152–53.

<sup>86</sup> PP, HC/ANR, 1914–16 (156), 39 and my elaboration.

<sup>87</sup> PP, HC/ANR, 1916 (88) 52; 1917–18 (129), 34; 1918 (47), 22; 1919 (74) 22.

uralization dynamics between Europe and the United States increased. While in Europe both migration and naturalization rates plunged, in the United States the dramatic decline in migration rates was compensated by a sharp rise in both petitions for and concessions of certificates of naturalization, probably also as a reaction to the war.<sup>88</sup>

These restrictive European policies on naturalization allowed for exceptions, however. During the war in Britain, for example, readmissions to citizenship were more significant than naturalizations. Between August 1914 and 1918, 1,640 former subjects who had lost their citizenship were readmitted. This practice favored above all British-born women (96.6 percent of all persons readmitted to British nationality) who had lost their nationality because of marriage with a foreigner.<sup>89</sup> Restrictive policies also allowed for discretionary practices, especially at the beginning of the conflict when there was still hope that it would be settled rapidly and when particularly important economic reasons were involved. In Britain, for example, at the very time that the Aliens Restriction Act was being enacted, Baron Bruno Schröder, a German banker in London, and his associate partner, Julius Rittershausen, were granted British naturalization papers in great haste.<sup>90</sup> Thirty-two Austro-Hungarians, 121 Germans, and three Ottomans also took the oath of allegiance between August and December 1914.<sup>91</sup>

Except for readmissions and a few special cases, like that of Baron Schröder, only one universally accepted path to naturalization was still accessible during the war, and that was enlistment. Fighting for the state and sacrificing oneself for the preservation of the nation or the empire were clear signs of loyalty and the desire to belong, and they were prerequisites of any citizenship claim. The emergency, and the shortage of manpower in particular, created opportunities for some individuals and categories of people while they closed those very same opportunities for others. In certain countries, naturalization was thus granted to men who were willing to fight (or willing to work) for the nation, including individuals who had been systematically excluded from the nation only a few years before the war (e.g., Russian Jews in Germany). Granting naturalization to foreigners in exchange for enlistment sometimes proved easier than forcing the return of fellow nationals who had emigrated all over the world.

In France, for example, a series of laws issued between the outbreak of the war and 1915 expanded the boundaries of citizenship for those willing to die for the country. A law passed on August 5, 1914, established that all Alsatian and

<sup>88</sup> For US data, see Susan B. Carter, ed., *Historical Statistics of the United States* (Cambridge, 2006).

<sup>89</sup> My elaboration on PP, HC/ANR, quoted in notes 86 and 87.

<sup>90</sup> Richard Roberts, *Schroders: Merchants and Bankers* (Basingstoke, 1992), 152–59.

<sup>91</sup> PP, HC/ANR, 1914 (206), 52. The numbers of women in these groups were five, forty-four, and zero, respectively.

Lorrainian males, including those born after 1870, could recover French nationality provided that they voluntarily signed up for the entire war.<sup>92</sup> The same law authorized the government to naturalize foreigners who enlisted for the war's entire duration.<sup>93</sup> Contrary to the normal naturalization procedure, this concession was strictly individual and did not extend to wives and children. Alsatian and Lorrainian women who were born after 1870 and had not requested reintegration before the war no longer received automatic naturalization when marrying a Frenchman, nor when marrying an Alsatian or Lorrainian serving in the French army, according to a law passed on March 17, 1917. Indeed, the same law made it difficult for all alien women to become citizens by marriage with a Frenchman. Spy fever and anti-Germanism convinced public opinion and deputies that, in the state of exception produced by the war, the automatic concession of citizenship to women upon marriage had to be stopped. Women might use this "privilege" either to spy and infiltrate French lines or to avoid expulsion or internment as enemy aliens. Marriages with alien women during the war thus required a special authorization granted by the Secretary of Justice.<sup>94</sup> As a result of the August 5, 1914, law, the French government naturalized 3,351 males between 1917 and 1926. The majority of them came from Italy, Spain, Belgium, and Switzerland.<sup>95</sup> Naturalization was also granted to a few colonial subjects, but not to the more than 220,000 North Africans, Malagasies, or Chinese who worked in state-run factories for the entire duration of the war substituting for Frenchmen enlisted in the army: they were immediately repatriated when their contracts expired.<sup>96</sup>

The acquisition of citizenship through enlistment was also a method used by members of minority groups and those who enjoyed a B-type citizenship, as, for example, colonial subjects of the French Empire who saw the war as an opportunity to "secure unique civic freedom within an assimilationist state."<sup>97</sup> The legislation introduced by Blaise Diagne that passed on October 19, 1915, and

<sup>92</sup> *Loi relative à l'admissions des Alsaciens-Lorrains dans l'Armée française*, August 5, 1914, article 1.

<sup>93</sup> *Ibid.*, article 3.

<sup>94</sup> Edouard Clunet, "La nationalité et la guerre," *Le Temps*, August 25, 1917.

<sup>95</sup> *Les naturalisations*, 24–25.

<sup>96</sup> In 1919, colonial male subjects accounted for 25 of 218 naturalizations granted for serving in the army. See France, Ministère de la Justice, *Compte général de l'administration de la justice civile et commerciale pendant l'année 1919 . . . France-Algérie-Tunisie* (Paris, 1924), table 41, 137. Bertrand Nogaro and Lucien Weil, *La main-d'œuvre étrangère & coloniale pendant la guerre* (Paris, 1926), 18.

<sup>97</sup> Sarah Zimmerman, "Citizenship, Military Service and Managing Exceptionalism: *Originaires* in World War I," in *Empires in World War I: Shifting Frontiers and Imperial Dynamics in a Global Conflict*, ed. Richard Fogarty and Andrew Jarboe (London, 2014), 219–48, 243.



September 29, 1916, for example, “tied *originaires*’ full citizenship to obligatory military service,” good behavior, and excellent performance on the battlefield.<sup>98</sup>

In Russia, the government “tightened up requirements that foreign males naturalized during the war immediately enter military service,”<sup>99</sup> and an equation between patriotism and citizenship was established “very much in the spirit of the *levée en masse*.”<sup>100</sup> As Melissa Stockdale notes, “Patriotism as a criterion of national belonging was inclusive and participatory, since every individual, regardless of faith or class or ethnicity, could (at least theoretically) be a patriot and demonstrate patriotism. Conversely, those who were not loyal, or would not serve and sacrifice, merited exclusion.”<sup>101</sup> In fact, the army and the way in which recruitment, participation, and reward were managed contributed to hastening “the reconfiguration of identities that was part of the longer term shift in the way Imperial society was structured, from traditional dynastic, confessional and estate categories to categories of class and ethnicity.”<sup>102</sup> Instead of an increase in cohesion and inclusion, war “intensified existing hostilities among the subject peoples”<sup>103</sup> of the empire and fostered intense anti-Jewish attitudes.<sup>104</sup> After the Moscow riots of June 1915, the government of the Russian Empire established “an outright ban on all naturalization of enemy subjects and neutral subjects who entered the country after the declaration of war.”<sup>105</sup>

In Britain, Home Secretary Edward Shortt declared to the House of Commons that “certificates of naturalization have been granted to considerable num-

<sup>98</sup> *Ibid.*, 226, and Marc Michel, “La genèse du recrutement de 1918 en Afrique noire française,” *Revue française d’histoire d’outre-mer* 58, no. 213 (1971): 433–50, 442. The *originaires* were a particular group of Senegalese subjects who enjoyed limited French citizenship accompanied by the privilege of maintaining certain cultural customs such as polygamy and sharia. On this topic I owe special thanks to Meredith Terretta.

<sup>99</sup> Lohr, *Russian Citizenship*, 127.

<sup>100</sup> Mark Von Hagen, “The *Levée en masse* from Russian Empire to Soviet Union, 1874–1938,” in *People in Arms: Military Myth and National Mobilization since the French Revolution*, ed. Daniel Moran and Arthur Waldron (Cambridge, 2003), 159–88, 168.

<sup>101</sup> Melissa K. Stockdale, “United in Gratitude: Honoring Soldiers and Defining the Nation in Russia’s Great War,” *Kritika: Explorations in Russian and Eurasian History* 7, no. 3 (2006): 459–85, 484–85.

<sup>102</sup> Von Hagen, “The *Levée en masse*,” 169.

<sup>103</sup> *Ibid.*, 170.

<sup>104</sup> Yohanan Petrovsky-Shtern, *Jews in the Russian Army, 1827–1917: Drafted into Modernity* (Cambridge, 2009).

<sup>105</sup> Lohr, *Russian Citizenship*, 127. Naturalizations resumed only after the revolution, when the first decrees issued by the Bolsheviks abolished restrictions based on nationality and religion and, driven by a strong “commitment to internationalism,” opened the doors to “foreigners who were members of the working class,” “the class of peasants that did not exploit hired labor,” and socialist activists. See Alexopoulos, “Soviet Citizenship,” 491–92.

bers of friendly aliens who have served in His Majesty's Forces," but he also noted that "an Amendment was introduced into Section 2 of the British Nationality and Status of Aliens Act, 1914, by the legislation passed last summer which had the effect of making a period of service with His Majesty's Forces equivalent to a period of residence in the United Kingdom for purposes of naturalisation."<sup>106</sup> In fact, the number of certificates granted on this basis was far from "considerable" during the war (77 men out of 224 obtained naturalization thanks to this provision in 1917 and 144 out of 236 in 1918), but it became increasingly so immediately after the war, when 3,612 (72 percent) out of 5,016 naturalization certificates issued between 1919 and 1922 were granted for "Service in His Majesty's Forces."<sup>107</sup>

Acquiring citizenship through enlistment was also an opportunity for foreign-born men in Prussia. The 1913 German citizenship law was based not only on the *jus sanguinis* principle but also on the idea that there could be no *Volksgemeinschaft* without a *Wehrgemeinschaft*. In a nutshell, military service was a requirement that could be used as an alternative to the ethnocultural one.<sup>108</sup> As "a statist, or civic, conception of nationalism appeared to triumph over narrower ethnic definitions,"<sup>109</sup> the patriotic path to naturalization remained open and, in fact, easier.<sup>110</sup> In Prussia, as in the rest of Germany, naturalizations continued to be granted to former Germans who had lost citizenship because they had resided abroad for more than ten years, to "resident aliens from disadvantaged ethnic and religious groups" who enlisted in the army, and to Russian Germans who either returned, voluntarily or forcibly, or who happened to be in the occupied territories of Eastern Europe and who were at the center of German relocation plans.<sup>111</sup> Contrary to what was happening in France or Britain, "the result, in Prussia, was an increase of some three thousand naturalizations each year over the 1914 figure, at least in 1915 and 1916."<sup>112</sup> Then, 1917 and 1918 saw a decrease. A similar trend was also observed in Baden and Bavaria.<sup>113</sup> The necessities of war, the occupation, and the conquest of new territories and the urgency of strengthening the army also induced a relaxation of the antisemitic, discrim-

<sup>106</sup> *Hansard*, HCD, February 24, 1919, 112:1425–6W.

<sup>107</sup> For 1917 and 1918, see note 87; for 1919–22, see PP, HC/ANR, 1919 (74); 1920 (95); 1921 (94); 1922 (116). This is my calculation.

<sup>108</sup> Gosewinkel, *Einbürgern*, 326.

<sup>109</sup> Annemarie Sammartino, *The Impossible Border: Germany and the East, 1914–1922* (Ithaca, NY, 2010), 24.

<sup>110</sup> Oliver Trevisiol, *Die Einbürgerungspraxis im Deutschen Reich, 1871–1945* (Göttingen, 2006), 47–48.

<sup>111</sup> Gosewinkel, *Einbürgern*, 331–37.

<sup>112</sup> Eli Nathans, *The Politics of Citizenship in Germany: Ethnicity, Utility and Nationalism* (Oxford, 2004), 185.

<sup>113</sup> Trevisiol, *Die Einbürgerungspraxis*, 66.

inatory Prussian citizenship policy. Non-German Jews who enlisted were more likely to see their naturalization petitions approved during the war rather than at any other time during the previous twenty-five years.<sup>114</sup> The two sons of Jakob Borg were naturalized in this way, for example—but their loyalty to the German army did not prevent the expulsion of their father, a tobacco entrepreneur who had lived in Danzig since 1887, even though he had repeatedly applied for naturalization showing his willingness to become a Prussian citizen.<sup>115</sup> According to Wertheimer and Gosewinkel's calculations, the naturalizations of Jews rose from 1.5 to 2.5 percent per year (of total naturalizations) to 9 percent in 1914 and to 7.7 percent in 1915 (624 out of 8,087).<sup>116</sup>

In Italy, too, jurists supported the idea that citizenship could be granted to foreigners provided they had Italian origins and enlisted in the Italian army.<sup>117</sup> In this and all of the cases mentioned above, however, the relatively small numbers of those naturalized demonstrated that the European states at war remained very wary of foreigners, especially in empires such as the French or the British that could count on colonial troops or contracted laborers such as Chinese.<sup>118</sup> This is illustrated dramatically when we compare the numbers of enlisted men naturalized in Britain or France with those in the United States, where, thanks to an act passed on May 9, 1918, in only one year “a total of 128,000 foreign soldiers were naturalized.”<sup>119</sup>

Naturalization could also be granted during the war to large groups of people in the hope of neutralizing their potential dangerousness and keeping the empire together. On his arrival in Syria at the end of 1914 to supervise military and civilian affairs, Djemal Pasha issued a regulation that offered wholesale Ottoman naturalization to Russian Jews in Palestine in exchange for not being expelled.<sup>120</sup> The US Ambassador Henry Morgenthau estimated at fifty to sixty thousand the number of Russian Jews in need of citizenship to secure their res-

<sup>114</sup> Nathans, *The Politics of Citizenship*, 185.

<sup>115</sup> This case is recounted by Jack Wertheimer, *Unwelcome Strangers: East European Jews in Imperial Germany* (New York, 1987), 56.

<sup>116</sup> *Ibid.*, 57; Dieter Gosewinkel, “‘Unerwünschte Elemente’—Einwanderung und Einbürgerung der Jude in Deutschland 1848–1933,” *Tel Aviver Jahrbuch für deutsche Geschichte* 27 (1998): 71–106, 97.

<sup>117</sup> G. C. Buzzati, “Note sulla cittadinanza,” *Rivista di diritto civile* 8 (1916): 485–506.

<sup>118</sup> Christian Koller, “The Recruitment of Colonial Troops in Africa and Asia and Their Deployment in Europe during the First World War,” *Immigrants and Minorities* 26, nos. 1/2 (2008): 111–33; Guoqi Xu, *Strangers on the Western Front: Chinese Workers in the Great War* (Cambridge, MA, 2011).

<sup>119</sup> Weil, *The Sovereign Citizen*, 46.

<sup>120</sup> Arthur Ruppin, *Memoirs, Diaries, Letters* (New York, 1972), 152.

idence in the area after becoming enemy aliens.<sup>121</sup> The Ottomanization of these particular enemy aliens was partly negotiated with local Jewish leaders, such as Arthur Ruppin, and with the crucial help of US ambassador Henry Morgenthau.<sup>122</sup> It was partly enforced with “severe treatment” and “the worst kind of threats.”<sup>123</sup> With Ottoman citizenship, which was granted against the payment of 37 francs for each family, Russian Jews obtained an exemption from military service.<sup>124</sup>

Ottomanization was considered by Arthur Ruppin “a heavy blow to the Jewish population” because it put a temporary stop to the Zionist project.<sup>125</sup> On January 18, 1915, he wrote from Jerusalem: “Nearly 4,000 Russian, French and English Jews who did not want to become naturalized have been forced to leave Palestine (15–18,000 have accepted naturalization). All Zionist emblems (the Star of David, flags, even the innocent stamps to collect money for the JNF, etc.) have been prohibited, and anyone displaying them is to be punished.”<sup>126</sup> On the other hand, Ottomanization helped prevent harsher treatment of the majority of the Jews who had already settled in Palestine; in particular, it prevented “their being concentrated or summarily expelled,”<sup>127</sup> as had happened on December 17, 1914, when “500 Russian Jews were suddenly rounded up by the *kaimakam* in Jaffa and deported to Egypt by sea.”<sup>128</sup> Decisions on both naturalization and denaturalization depended on the different perceptions of the security threat. The Sublime Porte wanted to avoid “making Palestine a Russian villayet by permitting a large number of Russian Jews to settle there and continue to remain Russian subjects”<sup>129</sup> and hoped that Ottomanization of the Russian Jews could neutralize or sterilize the emergence of another national question within the empire, as Halil Serif Pasha, president of the parliament, explicitly stated to Morgenthau.<sup>130</sup> In fact, naturalization stopped neither the colonization nor the harsh treatment of Jews. In the following months, as Ruppin recalled, they underwent “new ordeals, that arose from lack of confidence of the local Officials toward our work of colonization and which led to numerous law suits, arrests, and to many Jews being sent into exile.”<sup>131</sup>

<sup>121</sup> Turkey entered the war against Russia on November 11, 1914. For the estimate, see LoC, HMP-C, Morgenthau to Schiff, Marshall, and Strauss, October 21, 1914, con. 6.

<sup>122</sup> *Ibid.*, Morgenthau to Louis Marshall, November 29, 1914, con. 7. The negotiation can be followed by reading the correspondence in cons. 14 and 15.

<sup>123</sup> *Ibid.*, Morgenthau to Wise, January 25, 1915, con. 15.

<sup>124</sup> *Ibid.*, Ruppin to Morgenthau, March 29, 1915, con. 7.

<sup>125</sup> Ruppin, *Memoirs*, 152.

<sup>126</sup> *Ibid.*, 154.

<sup>127</sup> LoC, HMP-C, Morgenthau to Wise, January 25, 1915, con. 15.

<sup>128</sup> Ruppin, *Memoirs*, 153.

<sup>129</sup> LoC, HMP-C, Morgenthau to Wise, July 22, 1914, con. 14.

<sup>130</sup> *Ibid.*, Morgenthau to Wise, December 1, 1915, con. 15.

<sup>131</sup> *Ibid.*, Ruppin to Morgenthau, March 29, 1915, con. 7.

### III. DENATURALIZATION AND THE “ETHNIC” DIMENSION OF CITIZENSHIP

But even more than for naturalizations, “the World War crisis of 1914–1918 was responsible for the spread of denaturalization statutes over the European continent.”<sup>132</sup> Denaturalization provisions were a by-product of emergency legislation that passed without any opposition or impediment into peacetime nationality laws after 1918,<sup>133</sup> paving the way for the denaturalization policies implemented in Nazi Germany, Romania, Vichy France, and Italy. Driven by concerns over security, domestic subversion, and espionage, almost all the countries at war resorted to denaturalization of individuals and groups. Denaturalization began in France with a law passed on April 7, 1915, and culminated in the postwar mass denaturalization proclaimed and implemented in Bolshevik Russia between 1921 and 1924, which created about two million stateless individuals.<sup>134</sup>

After the French revolution, “the principle of denationalization . . . developed along two lines: as a *right* of the citizen to change his allegiance, *e.g.*, by naturalization in another country; and as a *sanction* for acts considered criminal, or at least prejudicial to his country, *e.g.*, military or public service in another country, or refusal to return in time of war.”<sup>135</sup> As concerns about security grew during the First World War, politicians and bureaucracies went after people whose conduct could be considered prejudicial to the country and who, they contended, in the year before the war, had obtained naturalization by fraud. But states at war first had to legislate in order to sanction internal enemies of this particular kind, whose main fault was having the wrong national origin. While the United States used a 1906 law on naturalizations and denaturalization,<sup>136</sup> the European nations of France, Britain, Portugal, and Romania adopted new provisions to act against naturalized individuals during the war, and Belgium, Italy, and Turkey introduced norms on denaturalization after 1918.<sup>137</sup>

Press campaigns and heated discussions in parliaments accompanied law making. Nationalistic and patriotic newspapers in France, Britain, the Russian Em-

<sup>132</sup> “Recent Trends in Denaturalization in the United States and Abroad,” *Columbia Law Review* 44, no. 5 (1944): 736–51, 739.

<sup>133</sup> For a comparative analysis of the loss of nationality provisions, see Durward V. Sandifer, “A Comparative Study of Laws Relating to Nationality at Birth and to Loss of Nationality,” *American Journal of International Law* 29, no. 2 (1935): 248–79.

<sup>134</sup> Golfo Alexopoulos, *Stalin’s Outcasts: Aliens, Citizens, and the Soviet State, 1926–1936* (Ithaca, NY, 2003); Lohr, *Russian Citizenship*, 147–51.

<sup>135</sup> “Recent Trends,” 737 n. 5.

<sup>136</sup> According to John L. Cable, *Loss of Citizenship, Denaturalization, the Alien in Wartime* (Washington, DC, 1943), iv: “During the First World war there was a marked increase in the number of denaturalization cases”; but Weil, *The Sovereign Citizen*, 3, maintains that only 1 percent of denaturalizations in the twentieth-century United States occurred during wars.

<sup>137</sup> “Recent Trends,” 739–42.

pire, and Italy were obsessed with these “disguised” citizens, and in the French, British, and Italian parliaments many voices from both the left and the right raised the issue of defending the citizenship boundary. In Britain, “those in parliament and the business community who demanded the removal of enemy influence from British industry and commerce often made clear that they considered British subjects of enemy origin equally as objectionable as enemy aliens.”<sup>138</sup> As Andrew Bonar Law declared on May 13, 1915: “There are Germans who became British subjects purely for business reasons, and who have not changed in their feelings of sympathy for Germany.”<sup>139</sup> And Horatio Bottomley, one of the foremost hardline MPs of the Liberal Party, writing in *John Bull*, a magazine known for having “played a role in creating a persecutory mood towards Germans within the United Kingdom,”<sup>140</sup> demanded that naturalized persons “‘be compelled to wear a distinctive badge’ and [that] none of their children ‘should be allowed to attend any school’.”<sup>141</sup> French newspapers such as *L’Information* spread rumors that many Germans had taken out US citizenship to save their assets from sequestration.<sup>142</sup> Italian members of parliament and officials advanced a similar argument. They feared that Germans might become Swiss nationals or apply to become Italian citizens according to the provisions of Article 3 of the 1912 Italian citizenship law in order to return to Italy, move freely, avoid sequestration of their assets, and resume their economic activities.<sup>143</sup>

In Germany, denaturalization was used as a sanction against those who put themselves outside of the *Wehrgemeinschaft*: draft dodgers and deserters.<sup>144</sup> In the Russian Empire, the need to improve control over its own subjects and the concern that former Russian subjects who, having migrated and become naturalized in another country, might return “on foreign passports as spies” resulted in a ban on denaturalization.<sup>145</sup> Similar convictions persuaded the Serbian government to decree, on September 21, 1916, that all persons who had left Bosnia and did not return by the end of October would automatically lose their Bosnian *Landesangehörigkeit*.<sup>146</sup> The obsession with spies and traitors also caused the

<sup>138</sup> Bird, *Control*, 334.

<sup>139</sup> Quoted by A. Lentin, *Banker, Traitor, Scapegoat, Spy?: The Troublesome Case of Sir Edgar Speyer; an Episode of the Great War* (London, 2013), 57–58.

<sup>140</sup> Adrian Gregory, *The Last Great War: British Society and the First World War* (Cambridge, 2008), 41.

<sup>141</sup> In an article published in *John Bull*, May 15, 1915, quoted by Lentin, *Banker*, 63.

<sup>142</sup> Weil, *Qu’est-ce qu’un français?*, 104.

<sup>143</sup> Caglioti, “Why and How,” 151. Archivio Centrale dello Stato, Roma, Presidenza del Consiglio dei Ministri, Guerra Europea, b. 124, fasc. 19-5-8, “Telegramma della Prefettura di Milano al Ministro degli Interni,” July 9, 1915.

<sup>144</sup> Gosewinkel, *Einbürgern*, 328.

<sup>145</sup> Lohr, *Russian Citizenship*, 121.

<sup>146</sup> Gammerl, *Staatsbürger*, 167.



Austro-Hungarian government to refrain from introducing denaturalization practices, notwithstanding the numerous plans put forward by the army. The Hungarian government in particular considered that controlling citizens involved in treacherous activity would be easier and more efficient than monitoring foreigners.<sup>147</sup>

Britain had been the first country to introduce denaturalization provisions. Article 7 of the British Nationality and Status of Aliens Act, approved on August 7, 1914, and put into effect on January 1, 1915, established that it was in the power of the secretary of state to revoke certificates of naturalization if they had been “obtained by false representation or fraud.”<sup>148</sup> The timing was accidental since the act was the result of a long parliamentary debate that had taken place before the outbreak of the war. Denaturalization thus did not enter the British legislation as a war measure, and consequently nationalistic public opinion and radical MPs considered the procedure to be too mild and ineffective. During the war, anti-German associations campaigned for a “drastic reform of the naturalization laws” and “to preserve effectually the heritage of British blood’ from any ‘foreign tramp who asks for it at the Home Office’.”<sup>149</sup> Notwithstanding the protest, the government maintained a low profile and a liberal attitude. It did not implement the provision and rejected the recommendations made by a House of Commons committee appointed to investigate the enemy aliens issue. Among the proposals rejected were the review and cancellation of “all the certificates of naturalizations granted to enemy aliens since January 1, 1914”; an investigation of persons of enemy alien origin who had been granted certificates of naturalization prior to January 1, 1914; and a review of “naturalization certificates granted to subjects of neutral nations since August 1, 1914.”<sup>150</sup> Liberals and hardliners eventually reached a compromise in the amendment to the British Nationality and Status of Aliens Act in August 1918.<sup>151</sup> The amendment added new grounds for the repeal of naturalizations and created a special judicial committee, the Certificates of Naturalisation (Revocation) Committee, chaired by a

<sup>147</sup> Ulrike von Hirschhausen, “From Imperial Inclusion to National Exclusion: Citizenship in the Habsburg Monarchy and in Austria, 1867–1923,” *European Review of History* 16, no. 4 (2009): 551–73, 558.

<sup>148</sup> This revocation was not possible under the Naturalization Act of 1870. See the British Nationality and Status of Aliens Act, 1914.

<sup>149</sup> Panikos Panayi, “The British Empire Union in the First World War,” *Immigrants and Minorities* 8, nos. 1–2 (1989): 113–28, 115–16. Also Sven Oliver Müller, “Recht und Rasse: Die Ethnisierung von Staatsangehörigkeit und Nationsvorstellung in Großbritannien im ersten Weltkrieg,” *Geschichte und Gesellschaft* 30, no. 3 (2004): 379–403.

<sup>150</sup> See TNA, CAB 24/24/57/76, “Enemy Aliens: Report to the Prime Minister of Sir H. Dalziel’s Committee,” July 9, 1918. See also the intervention on the report of the home secretary: “Sir G. Cave’s Statement,” 108:522–605.

<sup>151</sup> The bill received royal assent on August 8, 1918.

High Court judge, to settle controversial cases.<sup>152</sup> Between 1918 and 1930, the committee revoked 234 certificates of naturalization, 232 of which had been granted to men. Of these revocations, 135 concerned British nationals of former enemy alien origin (112 Germans, 18 former Austro-Hungarians, and 5 Turks), who thus became stateless. Denaturalization affected not only people who had spent most of their lives in Britain and who had enjoyed British nationality for decades but also their spouses and children.<sup>153</sup> Louis Herig, for example, had considered himself a British subject since October 27, 1873. On February 6, 1919, the committee labeled him “German,” stripped him of his nationality, and made him stateless. Other revocations affected 55 individuals of German, Austro-Hungarian, or Ottoman origins whose certificates had been issued between 1875 and 1899, 70 who had been naturalized between 1900 and the end of July 1914, and 9 who had obtained naturalization papers between August 1914 and 1915.<sup>154</sup> Because of the vast amount of argument and debate that it provoked, the most famous case of denaturalization was that of Edgar Speyer and his wife and three daughters. Speyer, a businessman and a philanthropist naturalized in 1892 who had achieved wealth and many honors (such as baronetage and membership in the Privy Council), was denaturalized in December 1921.<sup>155</sup>

France, unlike Britain, introduced denaturalization provisions ten months after the outbreak of the war and implemented them immediately. After a four-month debate in both parliament chambers, a law was issued on April 7, 1915, that authorized the administrative denaturalization of persons of enemy origin who had maintained (or who were thought to have maintained) their previous nationality; who had left the country to avoid conscription; who had taken up arms against France or helped the enemy (article 1); or who had obtained French citizenship after January 1, 1913 (article 2). This law led first to the review of twenty-five thousand naturalizations and then to the publication in the *Journal*

<sup>152</sup> According to the amendment, naturalizations could now be revoked also when “obtained . . . by concealment of material circumstances” or if “the person to whom the certificate is granted has shown himself by act or speech to be disaffected or disloyal to His Majesty.”

<sup>153</sup> Revocations concerned sixty-seven wives of British subjects of former enemy alien origins and thirty-seven children. See TNA, HO 144/13377, “List of Persons whose Certificates of Naturalization have been revoked . . . during the period 1st January, 1918 to 31st December, 1930.”

<sup>154</sup> My calculations on PP, HC/ANR, 1919 (74); 1920 (95); 1921 (94); 1922 (116); 1923 (58); 1924 (92); 1924–25 (83); 1926 (88); 1927 (66); 1928 (75); 1928–29 (109).

<sup>155</sup> Speyer became the target of a hate campaign from the beginning of the war. Eventually, the campaign led to his denaturalization in 1922. See PP, HC/ANR, 1922 [Cmd. 1569], *Report made to the Secretary of State for the Home Department by the Certificates of Naturalization (Revocation) Committee in the case of Sir Edgar Speyer* (London, 1922), and for a detailed analysis of the case, Lentin, *Banker*.

*Officiel* of a list of the names and addresses of persons of enemy origins who had been naturalized after January 1, 1913, thus making them vulnerable.<sup>156</sup> Eventually, however, it led to the denaturalization of only 122 individuals; these included persons on the list as well as individuals, mainly soldiers of the Foreign Legion, who had fled French territory (or who had changed their address and were untraceable) to avoid conscription (30 out of 122).<sup>157</sup> The numbers were not high, but the principle of denaturalization and the idea that dangerousness and ethnic origin went together had crept into French legislation after a debate completely dominated by spy fever, internal security concerns, double allegiance, and fear and hatred of German economic hegemony.

In contrast to the British case, the French law on denaturalization was intended as a defensive war measure, but its effects would last well beyond the exceptional situation created by the conflict. It was a reaction to a German law on citizenship passed in 1913 that had made it possible (surreptitiously, according to many) for Germans to have dual citizenship. In light of the war, this provision could be interpreted, on both shores of the Atlantic, as a German attempt to transform each naturalized German into a potential spy.<sup>158</sup> As the debate in the *Assemblée Nationale* demonstrates, many thought that the Germans who had applied for French naturalization in the past had done so to prepare for the war, infiltrate France, and strengthen German hegemony over the French economy. These convictions induced French jurists, officials, and members of parliament to maintain that France had been too generous in granting citizenship in the past.<sup>159</sup>

The draft law presented at the opening of the National Assembly on December 22, 1914, by the ministers of justice, internal affairs, and colonies (Aristide Briand, Louis Malvy, and Gaston Doumergue) had aimed at denaturalizing citizens who “continue to consider themselves as subjects of their country of origin

<sup>156</sup> “État nominative des naturalisations accordées depuis le 1er janvier 1913 à des sujets ou anciens sujets de puissance en guerre avec la France,” *Journal Officiel: Lois et décrets* (hereafter JO), May 7, 1915, 2926ff. The list included 758 names. The denaturalization decrees and amendments to the list were published in the following months in the same journal.

<sup>157</sup> According to the statistics of the Ministry of Justice: *Les naturalisations*, 41–43.

<sup>158</sup> Richard W. Flournoy, “Observations on the New German Law of Nationality,” *American Journal of International Law* 8, no. 3 (1914): 477–86; Jean Signorel, *Le statut des sujets ennemis: Le droit français pendant la guerre* (Paris, 1916); Borchard, *Diplomatic Protection*; Alfred Weil, “Des ambiguïtés de la dénationalisation allemande,” *Journal du Droit International* 43 (1916): 69–72; Clunet, “La nationalité et la guerre”; Edmond Thaller, *Esquisse de réforme de la législation des étrangers, particulièrement dans les rapports franco-allemands, individus et sociétés* (Paris, 1917); A. D. McNair, *Essays and Lectures upon Some Legal Effects of the War* (Cambridge, 1920), 14–16.

<sup>159</sup> Signorel, *Le statut*, 10; Louis Malnoury, *Les dénaturalisations d’anciens sujets d’Allemagne, Autriche-Hongrie et Turquie* (Paris, 1915); Thaller, *Esquisse*, 25.

and act or could be led to act as such.”<sup>160</sup> The presentation, along with other drafts concerning the same issue, stirred up the anger and hatred of the MPs regardless of their political allegiance. Indeed, during the debate in the Chamber of Deputies, two distinct proposals, one presented by left-democratic deputy Émile Constant, the other by Jules Delahaye, a member of the radical right-wing and antisemitic movement *l’Action Française*, called for the denaturalization of all French persons of enemy origin who had been granted naturalization after 1889.<sup>161</sup> Some others demanded to strip aliens and all naturalized persons of enemy origin of their property.<sup>162</sup> Others, such as Catholic deputies Joseph Denais and Jean Lerolle, both members of *Action Libérale*, asked for a limit to be set on the political rights of naturalized persons.<sup>163</sup> Still others called for controls on all aliens, fearing that enemies might enter France using a passport issued by a neutral country. (Americans and Swiss were deemed particularly untrustworthy.)

Compared with these other laws proposed by French MPs and with the debate that took place in the Chamber of Deputies and in the Senate, the bill on denaturalization, passed in April 1915, was more moderate, maintaining that naturalized persons of enemy origins were not part of a collective category. This merely paid lip service to the liberal tradition, however, since the envisaged mechanism entirely deprived denaturalized persons of judicial guarantee. Denaturalization would be accomplished by an administrative act, and the burden of proof for reversal would rest with the denaturalized individuals, who could appeal to the Council of State but would have little chance of having their reasons heard. Although Maurice Bernard, the main speaker for the government’s proposal, said that the French parliament had adopted the measure with the aim of seizing assets, not people, and that it was intended to give the government a new weapon with which to defend the country against potential internal enemies, the outcome of the law was to transform into enemies, and actually into stateless enemies, those who were denaturalized, making possible their internment and the confiscation of their property.

Among the victims of the first wave of denaturalization in France was Joseph Dreifuss, a leather merchant, who worked and lived in Paris. He was born in “Germany” in 1862. By 1915, he had been living in Paris for thirty years. His wife was French and, according to his declaration, he had no remaining ties with Germany. In 1912 he applied to become a French citizen, and he succeeded, but his new status was threatened and then overturned by the outbreak of the First World War. After the French National Assembly had passed the denatural-

<sup>160</sup> JO, Chambre de députés, Documents parlementaires, Séance du 22 décembre 1914, annexe no. 441, 2175.

<sup>161</sup> *Ibid.*, annexe no. 467, 2184 and annexe no. 471, 2185–86.

<sup>162</sup> *Ibid.*, annexe no. 468, 2184–85.

<sup>163</sup> *Ibid.*, annexe no. 472, 2186.

ization law discussed above, Dreyfuss was stripped of his French citizenship with a simple administrative act and without any further explanation. He reacted to what he considered an unexpected and unfair action by lodging an appeal with the Conseil d'Etat, but it rejected his petition on July 7, 1916. With the same judgment, the Conseil d'Etat also dismissed the claim of Michel (Max) Lévi, a diamond merchant—also born in “Germany”—who had been living in Paris for thirty-seven years. Like Dreyfuss, he declared himself to be a decent and honorable merchant, with no ties to Germany and sincerely attached to France. The Conseil d'Etat, an institution called to guarantee the due process of law, stated that deciding whom to denaturalize was a sovereign prerogative of the government, which, according to the law, was not compelled to justify and explain its decision.<sup>164</sup> André Denné, a third petitioner, was actually born in France in 1844. A son of a Bavarian, he had spent his entire life in France, had been married twice, both times to a French woman, and had obtained his naturalization decree on June 21, 1913. He had applied for naturalization to gain formal recognition of a citizenship that he claimed to possess because he was born in France. Although in 1844 there was no *jus soli* in France, by the time of Denné's petition in 1916 *jus soli* had not only become the standard way to acquire citizenship but was also dominating the republican discourse on citizenship and belonging. His age and his proclaimed “Frenchness” did not prevent him, and of course also his current wife Madame Roblot, from being stripped of his naturalization.<sup>165</sup> Only a few denaturalized persons petitioned the Conseil d'Etat: Dreyfuss, Lévi, and Denné, and later Gustave-Nathan Mayer, Hermann Meyers, Robert Diem, and their respective spouses, along with Ernest Frédéric Kopp—all but Denné bearing Jewish surnames.<sup>166</sup> They tried to follow the legal path to reverse the dire decisions that had changed their lives, seeking to demonstrate that they had not maintained German citizenship together with their French citizenship and that they could not be charged and condemned for having dual nationality, but their arguments were dismissed by the Conseil d'Etat.

As the war proceeded, the National Assembly continued to produce new laws and decrees affecting citizenship. On June 18, 1917, a new law on denaturalization changed the process.<sup>167</sup> The administrative procedure gave way to a judicial one that was supposed to give more guarantees to the defendants, arous-

<sup>164</sup> *Recueil des arrêts du Conseil d'État statuant au contentieux, des décisions du Tribunal des conflits et de la Cour des comptes* (Paris, 1916), July 7, 1916, 86:277–80. Germany is indicated in both cases as the country of birth even though a unified Germany did not yet exist in 1859 and 1862.

<sup>165</sup> *Recueil des arrêts du Conseil d'État statuant au contentieux, des décisions du Tribunal des conflits et de la Cour des comptes* (Paris, 1917), July 27, 1917, 87:607–8.

<sup>166</sup> *Ibid.*, February 16, 1917, 87:170–71; June 10, 1921, 575; April 20, 1923, 354.

<sup>167</sup> JO, June 20, 1917, 4731.

ing the criticism of respected lawyers such as Maurice Hauriou, who was extremely annoyed by the “juridical misgivings” on enemy aliens after three years of war.<sup>168</sup> Since the review of the naturalizations granted after January 1, 1913, had been completed and very few of those naturalized had been found guilty of fraud, denaturalization remained possible only for those with dual (or alleged dual) citizenship and those whom the judicial process found guilty of spying, collaborating with the enemy, and so on, and the new judicial procedure was used to denaturalize an additional 427 persons of German, Austro-Hungarian, or Turkish origin. In total, 549 persons were thus denaturalized from 1915 to 1923. Among them there were 473 males and 76 females: 413 Germans, 123 Austro-Hungarians, 5 Turks, 1 Bulgarian, and 2 individuals of unknown nationality.<sup>169</sup> And finally, a few weeks before the end of the conflict, the French parliament reopened the discussion on denaturalization—this time to consider a proposal intended, perhaps in response to Hauriou’s criticism, to facilitate and accelerate denaturalization procedures.

The French denaturalization measures were welcomed as a significant innovation and a precedent to imitate, as Jules Valéry suggested: “These laws are a very interesting legislative innovation. Their example should be followed. Every country which is jealous of its independence and of the value of its nationality as an honorable thing, should by law provide that not only in time of war, but also in peace, naturalization might be withdrawn from any person whose acts should be declared by the tribunal to be contrary to the sentiments which he affirmed when he changed his country, i.e., acts which prove that the change was not a reality.”<sup>170</sup>

#### IV. CONCLUDING REMARKS

Once decided upon, the measures and provisions discussed above had to be implemented. The need to enforce the regulations set in motion a mechanism that involved ordinary bureaucracies and offices that were created ad hoc. Yet, the capacity of the state to enforce these policies was continuously put to the test by the war itself and by its political evolution—not least the revolution and the collapse of the state in the Russian Empire, Germany, and Austria. Translation into practice of laws, decrees, and regulations—and not only those on aliens and enemy aliens—met with various setbacks caused by the scarcity of financial re-

<sup>168</sup> Maurice Hauriou, *Notes d'arrêts sur décisions du Conseil d'état et du Tribunal des conflits publiées au Recueil Sirey de 1892 à 1928: Réunies et classées par André Hauriou* (Paris, 1929), 2:11–12.

<sup>169</sup> *Les naturalisations*, 41–43.

<sup>170</sup> J. Valéry, “World War and Its Effect on Future Private International Law,” *Harvard Law Review* 31 (1918): 980–1010, 991.



sources, rivalries within the civil bureaucracies, conflicts between the army and the public administration, and the agency of the “victims.”<sup>171</sup>

As some of the cases I presented in this article show, aliens, enemy aliens, and internal enemies responded to the persecutions, discriminations, and vexations that they had to endure either by trying to evade or circumvent the regulations or by implementing strategies of survival: they might leave and re-emigrate (when feasible), enlist, appeal to the court, claim a different citizenship (that of a friendly or a neutral country) or a stateless status, marry a national or divorce an enemy national, or activate personal networks of relationships. These were some of the strategies that people devised to evade regulations, to survive, and to reduce the impact of the measures on their own lives and those of their families. A thorough analysis of these strategies of evasion and survival would be beyond the scope of this essay, but we may still draw some general conclusions.

What do the stories told in this article show? First, they indicate that citizenship was far from being a stable attribute and that it was subject to contingency, not only in multinational imperial formations but also in modern nation-states, and notwithstanding the existence of many formal rules, codes, and jurisprudence.<sup>172</sup> Citizenship, to quote Geoff Eley, “remained markedly under construction,”<sup>173</sup> but the war contributed to reducing the variety of juridical statuses and of emotional and affective belongings, forcing them into a few clear-cut categories.

Second, these stories show that during wartime, skepticism toward people with multiple or different identities (whether national, religious, linguistic, or ethnic) increased dramatically. In particular, having origins or parentage that did not coincide with one’s nationality—a German origin and a French nationality, for instance, or a French origin and a Swiss passport, as was the case of a number of Swiss living in the Alsatian operation zone<sup>174</sup>—made people suspect; they were considered untrustworthy and exposed to abuses and persecution.<sup>175</sup> National and local authorities were alert and ready to scrutinize not only foreigners

<sup>171</sup> Thanks to David Feldman for drawing my attention to these issues.

<sup>172</sup> On citizenship as contingent and contested practice, see Canning, “Reflections,” 216–18, and Geoff Eley, “Some General Thoughts on Citizenship in Germany,” in *Citizenship and National Identity*, 233–46.

<sup>173</sup> Eley, “General Thoughts,” 238.

<sup>174</sup> The German government decided to expel the Swiss (therefore neutral) citizens of French origin living in the Alsatian operation zone. A note of the German Foreign Office described them as “outwardly Swiss, but French within.” BAB, R901/82914, December 31, 1914, and R901/82915, April 2, 1915.

<sup>175</sup> For an interesting discussion of mistrusted loyalty on both sides during the war, see the case of Heligoland-born individuals in Jan Rüger, “Sovereignty and Empire in the North Sea, 1807–1918,” *American Historical Review* 119, no. 2 (2014): 313–38. Mistrust was directed at friendly aliens as well. See Laura Tabili, *Global Migrants, Local Culture: Natives and Newcomers in Provincial England, 1841–1939* (Basingstoke, 2011).

but also those who had voluntarily embraced a citizenship different from the one they had acquired through birth or descent, or those who lived in legal limbo because of the territorial changes that had taken place in the decades preceding the war.

Moreover, empires showed an increasing tendency to think like nation-states where citizenship was concerned. Above all, more than in the past, belligerent states tended to link citizenship to nationality, which meant territorializing membership in a state (linking citizenship to a nation, to a territory, and to the specific preeminent ethnic group) and making it contingent on ethnicity, religion, language, or social class, as in postwar Russia. States at war were concerned in particular with the uniqueness of citizenship. National ambiguity, dual citizenship, and allegiance to more than one state now became specters haunting many warring countries, especially those that had experienced intense migration movements. But solutions to the problem proved to be very different in different nations and sometimes opposed to one another, as the French and the Ottoman cases demonstrate. For French officials, “defrenchifying” French subjects who had German blood in their veins seemed the best thing to do. On the contrary, “Ottomanizing” Russian Jews or preventing the departure of “American born children of Syrian parentage”<sup>176</sup> seemed the easiest way to avoid national disturbances in the Ottoman Empire. Increasing, or at least not diminishing, the number of Ottoman subjects outside Anatolia was probably also part of a desperate attempt to preserve the empire, to maintain control over a territory and a population that had been sharply reduced by the Balkan wars of 1912 and 1913 and that the current war threatened to shrink even further.

Third, these stories also show that speaking of citizenship with the classic distinction between *jus soli* and *jus sanguinis* in mind (the assimilationist model vs. the ethnic model) does not aid the understanding of either the meaning of citizenship or the behavior of governments, parliaments, local authorities, and armies. Having the same blood, even in a country known for basing its citizenship law mainly on a *jus sanguinis* principle, did not automatically transform a person into a citizen. Elise and Josephine Rüssel were the two natural daughters of a male German citizen and a Cambodian woman. In February 1920, after having been interned as enemy aliens in a concentration camp in Phnom-Penh for five years and having their property confiscated, they asked to be recognized as German subjects. Rejecting their request, the German consul in Bangkok wrote that “the German father does not transfer his German nationality to his natural chil-

<sup>176</sup> National Archives and Record Administration, College Park, MD, RG 84, Diplomatic posts—Turkey, 371, America Consulate General, Beirut Syria, February 8, 1915. The letter refers in particular to Gabriel Farah: “this poor man, who has a most excellent record as a soldier for many years in the United States Army, is now detained here, exhausting his slender resources, and rapidly becoming destitute.”

dren but exclusively to those born in legitimate wedlock.”<sup>177</sup> Yet having different blood did not prevent the sons of a Russian Jew from obtaining citizenship and enlisting in the German army, as in the example of Jakob Borg mentioned above. In contrast, so-called assimilationist-model countries proved to be more nation- or ethnicity-driven in wartime than they were during peacetime. Being born on the territory of countries that relied on a *jus soli* system, such as Britain or France, did not protect people from discrimination, as in the cases of the many British spouses of German men who lost their original nationality upon marriage, or in the above-mentioned case of André Denné, who, although born in France before the introduction of the *jus soli*, tried to use that principle to reverse his fate.

Fourth, the stories show that citizenship was fluid, especially at a time when systems of personal identification were not particularly sophisticated, and not only states but also individuals could play with nationality by claiming to have different identities when it suited their interests. Last but not least, they show that, even though women had a derivative citizenship that could transform them into enemies or friends according to the citizenship of their husband (again as in the case of British-born women cited above), their origins and original citizenship could be used to strengthen and legitimize nationality and loyalty claims: In four out of five cases brought before the French Conseil d’Etat in the hope of reversing a denaturalization decision, the wife’s nationality before marriage was used to support the “Frenchness,” the loyalty, and the trustworthiness of the petitioners, men who had only recently been naturalized despite long residence in the country.

As a pillar of national sovereignty, citizenship played a critical role in the First World War. At the same time, the war played a crucial role in the reshaping of citizenship laws, concepts, and practices. It jeopardized the concept of citizenship as an act of choice or as bound to a territory, while strengthening the notion of citizenship as a community of descent rooted in loyalty and patriotism. But above all it equated the member/nonmember opposition with the friend/enemy opposition. The logic of the state at war and of the nation in arms trumped any argument in favor of dual citizenship, multiple belonging and identity, bi- and multilingualism, and so on, not only in nations but also in empires that the war made think and behave like nation-states.

Citizens as well as foreigners could be recast as dangerous internal enemies because of their origins or their ties to an enemy country. Origins, loyalty, sense of belonging, and patriotism tended to annul or override legal requirements such as residence or birth. The war precipitated the need to make citizenship coincide with nationally compact populations living within well-defined and protected

<sup>177</sup> Politisches Archiv des Auswärtigen Amtes—Berlin, R52226.

borders. But in addition, with its triumphant nationalism, the war imposed the idea that origins and citizenship should be consistent. It also created the sense that membership in a state ought to be exclusive—an idea that governments, parliaments, and jurists felt was threatened by the 1913 German Law that envisaged the possibility of a double citizenship. Consistency of origins and citizenship and exclusiveness of membership challenged assimilationist models of the state and the republican founding myth, made countries move away from universalistic approaches to citizenship, and transformed foreign-born citizens into aliens, notwithstanding their naturalization. Moreover, the war jeopardized the procedural guarantees that differentiated liberal democracies from authoritarian systems.

In addition, in matters of citizenship the war did not end in 1918. The peace treaties in central and eastern Europe, the concatenation of war and revolution and civil war in the former Russian Empire, and the war between Greece and Turkey produced new tensions and crises over borders and populations that created the basis for new citizenship claims, new refugee crises, and a severe increase in statelessness.

The legacy of the war and of the revolutions it nurtured was, therefore, long lasting and twofold. On the one hand, it accelerated processes of ethnicization, which were already under way.<sup>178</sup> The end of the state of emergency did not restore pre-war constitutional order, and peace treaties affirming national self-determination and regulating citizenship options legitimated the ethnolinguistic turn. On the other hand, as in the Soviet Union, the war and the revolution introduced new “identity” markers, such as class- and social-based discrimination, soon to be accompanied by ethnic-based security and political concerns.<sup>179</sup> Ethnicity, class, state security, and ideology thus helped population policies reach tragic new frontiers in the interwar years.

<sup>178</sup> See also Gammerl, *Staatsbürger*, 333.

<sup>179</sup> Terry Martin, “The Origins of Soviet Ethnic Cleansing,” *Journal of Modern History* 70, no. 4 (1998): 813–61.