

Sexual Ethics in New England Puritan Culture

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In this paper I will attempt to reconstruct a picture of the sexual ethics of the New England Puritan culture and the attitudes that were behind them. In so doing, I will draw from some rather diverse works that have all been published within the last ten years. They include: a recent study entitled The Puritan Conscience and Modern Sexuality, two works of feminist scholarship, Good Wives: Image and Reality in the Lives of Women in Northern New England 1650-1750 and Her Story, Gay American History, Keepers of the Vineyard: The Puritan Ministry and Collective Culture in Colonial New England, and Embodiment.

I have found five dimensions of Puritan experience which work together in the weaving of their sexual ethic. Even though they are inextricably bound up with one another in Puritan life and culture, these five areas are important to separate out in order to understand not only what the sexual ethic was, but also to understand how it was lived out. The five dimensions are not exclusive but descriptive categories. They are: (1) prevailing attitudes toward body and sexuality, (2) an ethic of constancy, (3) attitudes toward gender and gender roles, (4) women's experience, and (5) a value of spiritual equality in contrast with socioeconomic and political hierarchical structures. I will be discussing aspects of them and their relationship to each other throughout the paper.

To give a backdrop to my presentation and to illuminate my interest in the subject matter, I want to start with a modern view of salvation as fully related to sexuality, set forth by James Nelson in Embodiment.

Salvation in its original meaning is healing. It is the reuniting of what has been torn apart and estranged. It is the recovery of a center and a wholeness in that which has been split asunder. It is the overcoming of alienation within the body-self, between the person and the world, between the person and God.¹

As Nelson emphasizes in his definition of salvation, attitudes towards our body-selves and sexuality are fundamental to our religious existence. Deep fear and suspicion of "the flesh," perpetuating the kind of alienation that Nelson talks about, has had its destructive impact in the history of Christianity. In direct contrast to such fears, Nelson holds that salvation is sexual.

This does not mean that we are saved by our sexuality. We are saved by the grace of God--God's unearned, healing, life-giving love. But "sexual salvation" does mean that we are given new life not in spite of the fact that we are sexual body-selves, but precisely in and through this entire selfhood which we are.²

In tracing the movement toward the integration of sex and love through history, Nelson works off of the principle that all human ideas and understandings have their histories and hence are historically relative. The conscious link between sex and love is no different. He finds that the conscious possibility of integrating love's meaning with sexual expression arose in the centuries following the Middle Ages. Psychosexual intimacy which involves the self-disclosure of inner feelings and self-consciousness has developed only in modern times.³ Edmund Leites whose study focuses on the Puritans in England, stresses that the Puritans did not have a concept of a private interior life.

It is commonly thought that people have always possessed "interior" emotions, but this is not the case; it is a historical construction. The idea of a private interior life is a relatively recent one. It is not found in the classical world, not even in Augustine, who is often seen as a major figure in the creation of subjectivity.⁴

I find these comments by Nelson and Leites a fitting context from which to begin a discussion of the Puritans and their sexual ethics. As both have cautioned, a historically accurate view, not an imposition of modern views upon peoples of the past, is critical in understanding those people and their world. However, this is a difficult task since we can only view people in history through our modern eyes and perspectives. If the purpose, as mine is, is to understand the Puritans and their world, and see ourselves mirrored in it, we must seek to discern their issues with sexuality and spirituality and not judge. In particular, we must try to understand their story as it relates to the spirit-matter dualism that has certainly challenged, if not plagued, Christianity for centuries. As the community which brought American Congregationalism into full expression, the New England Puritans are an important group for this study.

According to Leites, if you want to understand Puritan culture, it should be clear that the steadiness of feeling, the reduction of self-involvement, and the restraint on open emotion are intended primarily for the benefit of others and the community. The resulting consequence was the manifestation of a private world which may be experienced as an essential feature of the self. This is the emotional reality that began to develop within the Puritan individual. This private realm, though unconceptualized and unexpressed in social relationships,

was nevertheless, claimed by the community for the good of the community. For example, emotional evenness and humor was something that could be counted on and could benefit others.⁵ Vigorously held community values and survival needs provided the context from which an ethic of constancy emerged.

The evolving emotional nature of the individual was most likely assisted by the physical conditions that existed for the New Englanders. Sharing rooms, beds, benches, trenchers, and even spoons did not afford the opportunity to develop the sense of personal space which is essential for either "polite" social interaction or conducive to the development of a private emotional realm claimed "for" the individual. Beds almost always occupied "public" space, even if, on rare occasions they were curtained for warmth or privacy. Often the front door opened on a bed.⁶ According to Laurel Thatcher Ulrich,

Sexual experience had not yet acquired the sanctity of a separate setting. Even if the notion had suggested itself, there was little possibility of segregating sex in the larger sense from the daily round of life. Procreation was everywhere, in the barnyard as well as the house. Since sleeping quarters were crowded and darkness provided the only privacy, many children must have gained their first awareness of copulation from half muffled sounds and shapes in the night.⁷

Given these necessary understandings, I would like to move to a discussion of the prevailing attitudes towards body and sexuality. Historians have tended to focus this discussion, Ulrich notes, around the relationship between religion and repression. They have continually asked the question, "How 'Puritan' were the Puritans?" I agree with her that the question is badly put if one is trying to understand the actual

human dramas. Nor does it help in bringing to light their actual attitudes toward body and sexuality. Some scholars, such as Michael Zukerman, insist that New England Puritans were hostile toward "the flesh." Others dispute that view and suggest that only some were.⁸

It is difficult to get a definitive reconstruction of actual attitudes from the information we have, but we can get somewhat of a general picture. Some have taken the "earthiness" and verbal openness around sexuality in seventeenth century court records to mean that attitudes toward sexuality were quite matter-of-fact. Ulrich sees this as a misinterpretation of the records. Certain actions occurred to release sexual tensions that were close to the surface. In premodern societies tensions were frequently vented in bawdy stories or epithets hurled in anger. We should not conclude that matter-of-factness characterizes dominant attitudes.⁹

Two efforts that yield helpful results are Nelson's focus on the integration of sex and love and Ulrich's focus on gender, and apt reconstruction of gender roles.¹⁰ According to Nelson, as courtly love in the late Middle Ages opened up the possibility of love's integration with sex on a conscious level "it also opened up to consciousness the sexual experience as a vehicle of communication, so that people more than ever before came to experience the sex act as meaningful".¹¹ The Puritans and the Quakers developed this theme in believing that the primary purpose of marriage was communion and, likewise, the primary purpose of sexual expression was communion.¹² Procreation was not primary but secondary, being termed a "non-essential good".

Marriage and sex were not dependent on procreation for their legitimation.¹³ The Puritans' married sexual expression had shifted to a "love" center with some spiritual depth and meaning. This hints that body affirming sexual experience and attitudes were within the realm of possibility.

Leites approaches this subject from the standpoint of English Puritan ideology. He tries to show how, and some possibilities for why the Puritans attempted to hold together in tension both the ideal of erotic pleasure and the ethic of constancy.

The Puritans called for delight within marriage, but they also called for sobriety, steadiness, and constancy--including constancy in affection, love, and erotic pleasure. This is a very tall order, and it seems apparent that the Puritans' expectations were unrealistic. They did not acknowledge how difficult it is to integrate erotic pleasure and constancy in the long term.

He goes on to explain,

One reason may have been their desire to make married life spiritually superior to celibacy. A more important reason is their attitude toward self control, their belief that control over one's feelings and conduct could generally be demanded and expected of all well-brought-up people.¹⁴

His perspective moves away from the central value of love and communion that Nelson emphasizes. His is a dialectical view which emphasizes the tension between erotic pleasure and constancy in the Puritan marriage as the dynamic most present in determining how sexual relationships played out over the long run.

Leites also concludes that it is clear that the Puritans called for emotional intimacy between men and women and a

physical intimacy which required erotic delight on both sides.¹⁵ He refutes Max Weber's view that saw Puritans as fundamentally ascetic. Leites stresses that they placed severe constraints upon erotic pleasure not because they thought sex was bad, but "because the pleasures of the erotic life are, at their fullest, highly passionate and agitated." ¹⁶ Such intensity of feeling disrupted the integrative ideal which the Puritans called for in marriage.¹⁷

I find Leites' thesis clarifying. However, what he is saying about Puritan attitudes about erotic pleasure and passionate feeling does not make a distinctive shift away from negative attitudes about the body. Feelings and passions are rooted in the body. Leites appears, then, simply to be describing another way in which the Puritans were suspicious and fearful of body and sexual expression. His argument finally, does not successfully refute Weber's view that the Puritans were fundamentally ascetic.

These negative attitudes are expressed in notions about masturbation. Masturbation was referred to by the term "self pollution", which dates at least from the Middle Ages. Puritan ministers considered it a sexual offense that was difficult to reform. Apparently it was a topic of enough conversation and possible controversy that Cotton Mather published and distributed The Pure Nazarite which warned against the dangers of this form of self-pleasure. In it he speculated on the frequency of this behavior among Puritans and recalled the harsh punishment that was once administered to the "criminals".

Though doubting a contemporary Swiss preacher's conclusion that "If the Punishment of Stoning to Death were to be inflicted on the criminals, the neighboring mountains would not afford stones enough to serve the execution," Mather reinforced a highly suspicious if not outright negative view of masturbation.¹⁸

George Selement in his analysis of the "secularization" of the New England Puritan culture, makes note of the changes in sexual expression with the changes in society that weakened the Puritan grip on New England culture. Though he dates the pattern of changes somewhere around the turn of the century, the timing is still the subject of debate.¹⁹ Sexual offenses, such as sex outside of marriage was on the rise. Puritan clergy struggled to keep hold of their power to influence and shape the community in the face of a growing provincial society where certain "Censurable Evils" began to flourish.²⁰

One of their major concerns was the patronization by men of the Boston bordellos. It is recorded that Cotton Mather worked fervently to shut these places down without avail. Ministers saw their sphere of influence diminish to pastoral counsel and reproof. There were many lay people who remained loyal to the Puritan values, but they had to contend with a steady threat to the belief system that community was destiny.²¹

Leites would conclude that the search by males for erotic pleasure outside of marriage was a result of the Puritan's unrealistic expectations of marriage. The conclusions that he makes about English Puritans can only inform what gave root to New England Puritan culture. We must not make the two cultures

analogous. New England Puritans developed a culture of their own with a composition of sexual ethics that were uniquely their own.

The set of dynamics which operated in sexual relations between the genders is based on the "property" concept of chastity and the religious concept that upheld the value of marital purity and premarital fidelity for both sexes. Keith Thomas has argued that the double standard in sexual relations is one manifestation of a hierarchical system which includes the subordination of one class to another and the subordination of female to male. From medieval times the "absolute property of woman's chastity was vested in her parents (particularly father), or her husband, and not in the woman herself". 22

Religious concepts, which found a concrete focus in the communion aspect of marriage, were more egalitarian and had the potential to open the door for the development of a more egalitarian legal system. However, reliance on Mosaic law reinforced the notion of male property rights. The Laws and Liberties of 1648, which followed Leviticus 20, established the death penalty for adultery and defined adultery according to the married status of the woman. A married man who engaged in sexual relations with an unmarried partner risked only a fine or a whipping, a married woman who did the same risked death. The inequity worked the other way as well. If a single man engaged in sexual relations with a married woman, he risked death, a single woman with a married man risked a fine or a whipping (as well as pregnancy and accompanying long-term shame and alienation). 23

According to Ulrich, adultery was such a heinous crime in the Bay Colony that convictions were rare. In prosecuting in this area, Massachusetts courts moved closer to a single standard. The married of either sex were usually punished more or less equally for the lesser crimes of "attempted adultery " "uncleanness; or "lascivious carriage." A woman's accusation was often enough to convict a man, especially if witnessed by the midwives at the time of delivery.²⁴

It is hard to know whether to read Ulrich's comments as saying that the practice of adultery was rare or convictions were rare. We do know that community members were not inclined to withhold knowledge that may relate to such goings on, for doing so would be considered a violation of their moral role in the community. Apparently the emphasis on marriage as a center of Puritan piety was protected. Through this, women gained a new kind of status.

It must not be forgotten that women were clearly subject to men in sexual matters as in most other areas of life. True sexual consent from women hardly seems possible since consent is based on the freedom and ability to say "no." So lopsided in the power aspect of the relationship, in sex, the woman traditionally gave while the male took.

If marriage was elevated, the most direct threat to marriage, male homosexual behavior, was punishable by death. About 1624-25 Richard Cornish, a ship's master was put to death in the Virginia Colony for an alleged homosexual attack on one of his stewards. The Council and General Court that executed

him was the ruling body of the Virginia Colony, which as Edmund S. Morgan describes,

consisted almost entirely of the men holding large numbers of servants These men, with a more than average interest in controlling the labor force, were thus enabled to maintain their personal ascendancy not only over their servants, but over all lesser men.²⁵

Jonathan Katz points out that the documents suggest the execution of Cornish was intricately involved with colonial class politics.²⁶ From my reading of the documents, it is evident that those who made their disagreement with the sentence of execution known, were severely punished. The punishments that were issued by the Council were a clear exercise of that body's authority.

The records also tell of one William Plaine who was condemned to death. The first governor of the Massachusetts Bay Colony, John Winthrop, writes in his History of New England about Plaine who was discovered to have used some "unclean" practices. Upon examination and testimony, it was found:

that being a married man, he had committed sodomy with two persons' in England, and that he corrupted a great part of the youth of Guilford by masturbations, which he committed, and provoked others to the like above a hundred times; and to some who questioned the lawfulness of such filthy practice, he did insinuate seeds of atheism, questioning whether there was a God, etc.²⁷

All the magistrates and elders agreed that he should die. Their justification for the death came from "diverse reasons from the word of God". Winthrop then adds his judgement,

And indeed it was horrendum facinus (a dreadful crime), and be a monster in human shape, exceeding all human rules and examples that ever had been

heard of, and it tended to the frustrating of the ordinance of marriage and the hindering of the generation of mankind.²⁸

In the New Netherland Colony in 1646 a ten-year-old black male was punished for the homosexual act that was committed against him. The perpetrator, Jan Creoli, a black man who was charged with his second offense of sodomy, was sentenced to be conveyed to the place of public execution, choked to death, then burnt to ashes. The boy was sentenced to be carried to the place where Creoli was to be executed, tied to a stake, with "faggots" piled around him. Then "for justice sake," he was to be flogged.²⁹

Youths were subject to punishment by death as well. The death penalty which came from English law stated that sodomy was a crime for which males over fourteen might be hanged. Five young males who were among the first American immigrants were treated in the following manner according to the journal of Rev. Francis Higgesons.

This day we examined 5 beastly Sodomiticall boyes, which confessed their wickedness not to bee named. The fact was so fowl we reserved them to be punished by the governor when we came to New England, who afterward sent them backe to the company to bee punished in ould England as the crime deserved.³⁰

Homosexual behavior between women was more difficult to know how to deal with among Puritans. The English buggery statute was not taken to apply to sexual relations between two women. The Old Testament made no reference to lesbianism as it had for male homosexuality. Although church canonists interpreting the traditions of Roman law as they bore on sodomy, regularly

included lesbian acts as meriting capital punishment, there was less charity about how to adjudicate such matters. Social historian Judith C. Brown writes,

The contradictory notions that Western Europeans had about women's sexuality made it impossible to discuss lesbian sexuality openly, if at all. Silence bred confusion and confusion bred fear. On these foundations Western Society built an impenetrable barrier that has lasted for nearly two thousand years.³¹

Was lesbian activity considered a violation of the male property rights over women's "chastity"? Since women were not considered to be vested with ownership of their own bodies, would sexual relations between women threaten a male's right to have exclusive right to a woman's body? These questions may never have been raised due to the lowlier status of women. The controversy focused on whether to consider lesbian activity as sodomy and whether it should be punished by death.

John Cotton, in 1636, was the first to include lesbianism as sodomy in his proposed legislation for the General Court of Massachusetts. In it he says:

Unnatural filthiness, to be punished with death whether sodomy, which is carnal fellowship of man with man, or woman with woman, or buggery, which is carnal fellowship of man or woman with beast or fowls.³²

However, Cotton's proposals were not adopted by the Court which had asked ^{him} to draw up a group of laws for the colony.³³

The question about whether women who engage in sexual relations with other women should be put to death or not, remained. It was discussed again in March or 1642 when the theological authorities of Plymouth received a letter from the

governor of the Massachusetts Bay Colony, Richard Bellingham, asking their advice on how to punish "heinous offenses in point of uncleanness", specifically a case of heterosexual sodomy involving the rape of two little girls, and a case of bestiality. William Bradford answered the letter two months later with the written responses of three Plymouth theologians to the question, "What sodomitical acts are to be punished with death?" All three opinions, claiming Biblical authority, included male homosexuality, only one included lesbianism.

Rev. Charles Chauncy had the most inclusive list. He writes that adultery, rape, abortion, incest, bestiality, sodomy, and "all presumptuous sins" are to be punished by death. He reasons, "if unnatural lusts of men with men, or women with women . . . be punished with death, then . . . natural lusts of men towards children under age are so to be punished". The two heterosexual rapist-child molesters were not sentenced to be executed but got off with a fine and a whipping.³⁴

As Judith Brown observes, there is a dearth of historical information about lesbianism. That is true for colonial times as well. There are no actual trials that have been documented (of which I am aware). However, discussion of the matter suggests an awareness on the part of the clergy and magistrates of its existence. For finally, in 1655 New Haven Colony published a body of laws that had a sodomy statute that was unique among colonial laws for its inclusion of lesbianism, heterosexual anal intercourse, and masturbation as crimes punishable by death.³⁵

What kind of conclusions can be drawn from these legal documents regarding sexual activity? The first conclusion is that sexual offenses were punished, taken very seriously, and many were punishable by death. Any sexual behavior outside the confines of marriage was subject to intense scrutiny by the community. In this way, shame operated as a social control. Clergy and magistrates conferred together in drawing up legislation and many of the English statutes regarding sexual "crimes" were retained.

Ulich reconstructs the stories of three women from their court cases who went to court because they were sexually violated. Beyond telling their stories, her purpose is to determine how the court accounts translate into gender roles which were enacted in the intimate area of ordinary life.³⁶ Her method shed important light on the Puritan view of sexuality which I will come back to address.

However, it is necessary at this point to comment upon a critical piece of the picture that is missing. It is the direct reporting of women about their experience. As Barbara J. MacHaffie says in her work on women in Christian tradition,

What we lack is satisfactory knowledge of how women viewed themselves within the context of the Christian community. Some written works of colonial women, either once left uncatalogued or regarded as "anonymous" by many libraries are being discovered slowly. They are shedding light on how women responded to their situations in both thought and action.³⁷

She suggests that, "What emerges from all of these sources is not the expected picture of colonial churches as uniformly and rigidly patriarchal". MacHaffie describes a more modified

patriarchy in which "women are certainly treated and viewed as subordinate to men," and yet, the "religious communities of the colonies reveal active women and a surprising appreciation for the feminine." 38

In her revealing gender study, Ulrich raises an interesting argument which points to an underlying ambiguity surrounding Puritan sexuality. She explains: "To impugn a person's sexual integrity was a particularly important form of slander in early New England, suggesting that the values enshrined in formal law were widely acknowledged but tenuously held." 39 Words like whore, jade, bawd, strumpet and trull came quickly to the tongues of village gossips (and meant everything and nothing). In their wider application she insists, "their epithets turned not on specific behavior but on an underlying ambiguity surrounding sexuality." 40 Such ambiguity is explained for her by the religious understanding that the potential for evil was innate, and lust may break out uncontrollably anywhere. This was linked to a traditional fatalism, an inability to see oneself in any way as a shaper of events. Although this attitude affected both sexes, in the traditional fatalism it was even more powerfully linked with femininity. 41

Ulrich is saying that religion, for many New Englanders, was only a "thin overlay" on a traditional fatalism and this this explains a pervasive sense of ambiguity in the Puritan self-understanding. This analysis brings new meaning to the historical documents heretofore discussed and to the English folk ways which influenced Puritan culture. With the focus on

gender, sexuality and sin and evil, Ulrich weaves the underside of Puritan views. She elaborates further upon this theme:

Outside of family and community government, males were carnal, sensual, and devilish. Puritan writers were amazed at the sexual restraint of Indian men, who never raped their captives. They could only attribute this amazing preservation of New England women to divine intervention.⁴³

These were the dark attitudes about men which were in tension with the religious and communal ideal they sought to live out.

Although there was some intentional action on the part of New England ministers to counter the ancient misogyny of blaming Eve and women for all evil, they saw Eve's transgression as an inevitable consequence of her nature. That nature was weak, unstable, and susceptible to suggestion. Ulrich finds that both sexes were seen as culpable, but with differences.

Men required restraint, especially when drunk. Women needed protection, not because they were innocent, but because they were not. They were physically and sexually vulnerable, easily aroused, quick to succumb to flattery. Widows were considered especially susceptible to temptation.⁴⁴

For a woman, sexual reputation was everything. The vocabulary describing the sexual misbehavior of women was richer and more direct than for men. It did not mix sexual meanings with more general meanings, for example, the words whore (female) and rogue (male). For a man, sexual reputation was not everything, but a part of a larger pattern of responsibility.⁴⁵

I question two of Ulrich's major premises. It is quite radical to say that for many New Englanders religion was only a thin overlay on a traditional fatalism. Religious thought and

piety was deeply embedded in and formative of the Puritan community. It empowered the community in many ways. Conversion narratives testify to life-changing events, attitudes, and living. I believe Ulrich rightly points to a dynamic within New England consciousness but may be overstating the case and simplifying it. To make conclusive comments about this point is beyond the scope of this paper.

The second point of contention I have with Ulrich is her observation that women and men were seen as more or less equally sinful. The entire phenomena that occurred with the witch trials challenges this notion. Further study of the issues is necessary for a more complete argument on this matter.

As we seek to understand the Puritans in the intimate, yet at the same time, religious and political area of sexuality, what emerges is a sexual ethic based in marriage, with its center in love and communion. Given the many views and social structures inherited by them from their English culture, they held tenaciously to a new interpretation of love and sex which provided for spiritual depth. They did this in some fairly rigid ways through their legal system. Ambiguity generating from the link with erotic passions and evil, with its link with fatalism plays its role in shaping the Puritan sexual ethic. Classist and sexist structures that render certain groups without power in various areas of their lives figure in strongly in shaping the sexual ethic. This ethic is a complex weaving that is only understandable by looking from many perspectives. Hopefully, this paper has accomplished the task of reconstructing and appreciating the weave. In it we can see

ourselves and our world, and our own struggle to affirm God's loving activity at the center of our sexual ethic. However, we must learn from the gender inequities, the capital punishment, and the dark side of the Puritan sexual experience. It is only then that we can see and understand the distortions that the will to love and communion can take. Then we can work creatively towards shaping a sexual ethic that escapes the dualisms of body (matter) and spirit and frees us from oppressive attitudes and structures in the most intimate area of our lives.

Endnotes

1. James B. Nelson, Embodiment. Augsburg Publishing House, 1978, p. 70.
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3. Ibid., p. 107.
4. Edmund Leites, The Puritan Conscience and Modern Sexuality, Yale University, 1986, p. 8.
5. Ibid., pp. 8-9.
6. Laurel Thatcher Ulrich, Good Wives: Image and Reality in the Lives of Women in Northern New England 1650-1750, Oxford University Press, 1980, pp. 94-95.
7. Ibid., p. 95.
8. Ibid., p. 93.
9. Ibid., p. 96.
10. Ibid., p. 93.
11. Nelson, Embodiment, p. 107.
12. Ibid., p. 108.
13. Ibid., p. 108.
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15. Ibid., p. 16.
16. Ibid., p. 16.
17. Ibid., p. 16.
18. George Selement, Keepers of the Vineyard: The Puritan Ministry and Collective Culture in Colonial New England, University Press of America, 1984, p. 90.

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20. Ibid., p. 90.
21. Ibid., p. 90.
22. Ulrich, Good Wives, pp. 93-94.
23. Ibid., p. 93.
24. Ibid., p. 94.
25. Jonathan Katz, Gay American History, Harper & Row, 1976, pp. 16-19.
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27. Ibid., p. 22.
28. Ibid., p. 22.
29. Ibid., pp. 22-23.
30. Ibid., p. 20.
31. Judith C. Brown, Immodest Acts: The Life of a Lesbian Nun in Renaissance Italy, Oxford University Press, 1986, p. 20.
32. Jonathan Katz, Gay American History, p. 20.
33. Ibid., p. 20.
34. Ibid., p. 21.
35. Ibid., p. 23.
36. Ulrich, Good Wives, p. 94.
37. Barbara J. MacHaffie, Her Story, Fortress Press, 1986, p. 75.
38. Ibid., p. 75.
39. Ulrich, Good Wives, p. 96.
40. Ibid., p. 96.
41. Ibid., p. 97.
42. Ibid., p. 97.

43. Ibid., p. 97.

44. Ibid., p. 97.

45. Ibid., p. 97.

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