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AMERICA’S FIRST LAW SCHOOLS: SIGNIFICANCE OR CHAUVINISM?

By William F. Swindler

Prologue

In the history of science and other fields of learning it has often happened that new ideas have been developed more or less simultaneously by men widely separated from, and more often than not unknown to, each other. Once the discovery has been made or the activity well established, however, the matter is taken over by succeeding generations of students, friends, descendants or simple promoters of one party or the other as the real discoverer or pioneer. Thereupon, the zeal of the followers often waxes increasingly acerbic until the facts become secondary, (if the enthusiasts ever considered them) and, what is particularly regrettable, the men who made the original contribution to human affairs tend to be neglected. In a broader field of recent history, one may recall the outrage with which pro-Columbians greeted the publication of a volume tending to substantiate the persistent belief that Norsemen had discovered part of the North American continent quite some time before 1492.\(^1\)

Thus it should not be surprising that in such a compulsively litigious profession as the law that should have raged, through most of this century, a dispute over the beginnings of legal education in America. Who was first, where he taught and what he taught, have become issues which at times have all but overshadowed the basic fact, that certain conditions created a need for formal teaching of law in the

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new Republic and that this need was accommodated in several forms. Add to this the touchiness of sectional pride — Virginia, after all, has not hesitated to challenge Massachusetts on the matter of the first Thanksgiving\textsuperscript{2} and has taken issue with Chief Justice Warren (\textit{inter alia!}) for his impolitic and technically incorrect comment on the common law and the \textit{Mayflower}\textsuperscript{3} — and one may despair of ever replacing heat with light.

The contributions of Tapping Reeve and George Wythe\textsuperscript{4} to American legal education have thus tended to be drowned out in the cacophony of claims and counter-claims made by their latter-day admirers. More objective (and often embarrassed) scholars have suggested to little avail that there was plenty of honor to pass around. The present paper undertakes — with little hope of settling the matter, however — to document the dispute and to give to each of these remarkable men, and the locales in Litchfield and Williamsburg which have, to their great credit, preserved the physical record and setting for their accomplishments, the credit to which each is due.

\textsuperscript{2} Cf. Dabney, \textit{That Mythical First Thanksgiving}, 231 Sat. Eve. Post 38 (Nov. 29, 1958). Duly admonished, Massachusetts-born President Kennedy in 1963 recognized the joint origins in his Thanksgiving proclamation (although Texas-born President Johnson did not in 1965). At restored Berkeley Plantation on the James River in Virginia, an annual "it-did-so-happen-here-first" Thanksgiving re-enactment and chilly outdoor dinner are now presented, in derogation of a prior ceremony at Roanoke Island in 1583 and probable similar expressions of gratitude for deliverance by Columbus in 1492 and Leif Ericson (\textsuperscript{5}) ca. 1000.

\textsuperscript{3} "Not the least precious part of the cargo brought by the Pilgrims in the \textit{first Mayflower} was the common law." Warren, C. J., at Westminster Hall in London July 24, 1957. \textit{Cf.} 43 A. B. A. J. 889 (1957). In May 1959 a plaque unequivocally proclaiming that the common law did so come first to Virginia was placed on the wall of the ruined old church at Jamestown in ceremonies in which the principal addresses were given by Sir Harold Caccia, then Her Britannic Majesty's Ambassador to the United States, and Ross L. Malone, Esq., then president of the American Bar Association. \textit{Cf.} the data book compiled for that occasion by the present writer, \textit{The Common Law in America} (1959).

\textsuperscript{4} Pronounced "With" by the \textit{cognoscenti} for the same reason that they pronounce Coke as "Cooke"; the linguistic explanation in these cases is perhaps more persuasive than any that might be found for the Virginia practice of pronouncing Talliaferro as "Tolliver."
The Ex Post Facto Debate

Early in the present century, Dean William Draper Lewis of the University of Pennsylvania edited an eight-volume collection of professional biographies which is still highly recommended reading for law students and practitioners.\(^5\) In the opening volume Dr. Lyon G. Tyler, one of the South's leading historians and then president of the College of William and Mary, contributed the sketch on George Wythe, in which he observed:

\[\ldots \text{Mr. Wythe's reputation for learning... led to his}\]
\[\text{election by the board of visitors of William and Mary}\]
\[\text{College to fill the new chair of law and police [power]\}\]
\[\text{established in the institution by Mr. Jefferson at the}\]
\[\text{re-organization of the College curriculum in 1779. In this}\]
\[\text{professorship Mr. Wythe remained for twelve years...}\]^6

In the second volume of this series Simeon E. Baldwin, distinguished New England attorney and statesman, wrote the sketch on James Gould, Reeve's successor in the Litchfield Law School; whether Baldwin had read Tyler's article in the first volume is not known, but in the sketch on Gould he described the Litchfield Law School as "the first that was set up in America,"\(^7\) a reiteration of a statement he had made in an earlier work in which he described the Connecticut school as having been opened in 1784.\(^8\) In this same book Baldwin acknowledged that "the first chair of law in the United States was established at William and Mary College in 1779"; whereupon, apparently convinced that the manifest priority in the dates required the impeachment of the character of the college program, he continued with the gratuitous declaration:

The lectures of Chancellor Wythe at William and Mary, like those of Mr. Justice Wilson in 1790 at the University

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\(^5\) Lewis, Great American Lawyers (1907-09).
\(^7\) Op. cit., II, 455.
of Pennsylvania, and of Chancellor Kent in 1794 at Columbia, were designed, as were Blackstone's at Oxford, to give such information as to the nature and principles of law as might be of service to anyone desirous of acquiring a liberal education. Such instruction could not be considered as anything approaching a proper preparation for entering on the practice of the legal profession.9

Where Baldwin got the information upon which he based his depreciation of the William and Mary law program is not clear, although it was perpetuated in print and cited thereafter as authority by various other leaders of the bar and of legal education in ensuing years. It was rebuttable by documentary evidence, part of which was in published form at the time.10 However, the only public contradiction of Baldwin's pontifical pronouncement — and that a somewhat oblique one — did not come until 1914 when the Association for the Preservation of Virginia Antiquities placed a marble tablet on the porch of the Sir Christopher Wren Building on the College campus, reciting the oft-quoted priorities of this institution including its 1779 chair of law.11

The refutation of Baldwin's attempted downgrading of the William and Mary law program — in itself a tacit admission that without disparaging the character of this program the degree of priority he was asserting for Litchfield could not be maintained — is set out in a subsequent portion of this paper. It may be assumed that no one in the outside world was electrified by the tablet of priorities erected by the A. P. V. A., and thus the fat did not really get into the fire until preparations began for reactivating the law school at William and Mary, dormant for six decades after the closing of its doors in 1861. (The school officially reopened in 1922.) As news of the coming event reached the Northern fastnesses, James P. Woodruff of Litchfield

9 Baldwin, loc. cit. n. 8 supra, at 349.
10 Cf. nn. 28, 34 and 36 infra.
11 The priorities include Phi Beta Kappa, founded at the College in 1776, and chairs of law, modern languages and science in 1779; in 1784 the first chair of economics was established, and in 1803 a chair in modern history.
took up the Baldwin thesis in a letter to the New York Times, which was answered by a letter from Robert M. Hughes, widely known attorney from Norfolk, Va. \(^ {12} \) Hughes followed up this exchange with an earnest article in the June 1921 issue of the American Bar Association Journal tracing the history of the William and Mary Law School from Wythe in 1779 to Charles Morris in 1859-61, an eighty-two year period of continued professional training. \(^ {13} \)

Hughes also engaged in a brief skirmish with the Philadelphia attorney and distinguished legal historian, Hampton L. Carson, who sought to refurbish the University of Pennsylvania's claims to early legal education. However, since Carson could rely on nothing but some brief lectures on the Constitution by Mr. Justice James Wilson in 1790, the learned counsel from the Keystone State was never really able to make out a case. \(^ {14} \) The dispute settled down to a steady simmer thereafter, with the supporters of the respective claims for Litchfield or William and Mary periodically bursting forth with a triumphant announcement that they had outflanked the opposition. In 1933 a publication by the Connecticut Tercentenary Commission came out with the dates from 1776 to 1833 as the period for the Litchfield school. \(^ {16} \) Ah, there — what was afoot? It was clear that the Baldwin thesis of the non-professional character of the 1779 beginning at Williamsburg had become progressively more untenable and that it now appeared necessary to abandon both the thesis and the date, 1784, which both Baldwin and the subject of his biography in the second volume of Lewis (Judge Gould) had agreed upon as the start of the formal program under Reeve. \(^ {16} \)

\(^ {12} \) Cf. N. Y. Times, Aug. 9, 20, 1920.

\(^ {13} \) Hughes, William and Mary's Pioneer American Law School, 7 A. B. A. J. 309 (1921).

\(^ {14} \) Hughes, William and Mary, the First American Law School, 2 WM. & MARY Q. (2d ser.) 40 (1922).


\(^ {16} \) Loc. cit, n. 7 supra; cf. the 1828 advertisement of the Law School: "The Law School was established in 1782 by the Hon. Tapping Reeve . . . and con-
The Litchfield protagonists now elected to trace their claims back to Reeve’s first student — his brother-in-law Aaron Burr, whom he accepted to read law under him in 1774, two years after his own admission to the bar. (This date improved upon the Tercentenary Commission claim by two years.) However, it did not strengthen the case, which by now was assuming inordinate significance in the minds of its advocates; for this tactic merely invited comparison with the students whom Wythe had been accepting since about 1760, after some fifteen years of experience in practice. Thomas Jefferson studied law under Wythe for five years, beginning in 1762; ten years later St. George Tucker, who would later succeed Wythe in the William and Mary professorship, began his studies under this mentor. By this time Wythe had acquired so wide a reputation for his teaching that Tucker’s father wrote to him from Bermuda that with “so good a tutor” the young St. George would be substantially better off to prepare for the bar in Virginia than at the Inner Temple in London where he had already been formally enrolled. Wythe’s reputation as a teacher and lawyer was established by the time Jefferson turned to him in 1762, and its steady enhancing over the years led to his appointment to the professorship in December 1779.

The next round went to William and Mary in 1955 when the bicentennial of the birth of John Marshall, Wythe’s greatest pupil, led to an extended celebration of the careers of both Marshall and Wythe and their English antecedent, William Blackstone. Seven years later busts of the three

tined under his sole direction until the year 1798, when the Hon. J. Gould was associated with him . . .” reprinted in The Litchfield Law School 4-5 (1900). Cf. also Ellis, The Litchfield Law School, 2 Conn. B. J. 73 (1928).


18 Henry Tucker to St. George Tucker, Aug. 1, 1772, MS in Tucker-Coleman Collection, College of William and Mary.


great leaders of Anglo-American jurisprudence were formally presented to the Federal Bar Foundation in Washington, and another round was drunk to the William and Mary priority.21 The clincher seemed to be applied in 1964 when Dean Erwin Griswold of the Harvard Law School, in the Hamlyn Lectures in England made the following statement:

Though Wythe and Tucker were professors in a University, without being set up as a separate "law school," the difference is simply one of definition. There can be no doubt that Wythe and Tucker and their successors at William and Mary were engaged in a substantial, successful and influential venture in legal education, and that their effort can fairly be called the first law school in America.22

But, to no one's surprise, this did not settle the matter. In December 1965 came the National Parks Service with its Historic Sites citation of the Tapping Reeve law school as the "first in the United States." This at once put in the shadow everything that had been said or shouted from Tyler to Baldwin to the A. P. V. A. to Hughes to Woodruff to Carson to the Connecticut Tercentenary Commission to the Marshall-Wythe-Blackstone Bicentennial to the dedication of the Federal Bar Foundation busts to the Griswold lectures. (In the excitement, no one on either side of the latest donnybrook remembered that three years earlier the same program of the National Parks Service had cited the Wren Building at the College with its tablet of priorities.) It was heyday in Connecticut and "Mayday" in Virginia; the South rose again and marched on Washington, this time to lay seige to the hapless Department of the Interior.

The National Parks Service was now introduced to one more historic site — No Man's Land — with itself caught

squarely between the cross-fire of the Litchfield and William and Mary irregulars. Retiring in disorder to a position which had not been previously prepared, the Interior officials vigorously denied a claim carried by the news services out of Litchfield, that they had undertaken to settle the issue between the two law schools. In fairness to the Department and its Parks Service, it should be added that when Interior officials revised the citation to Litchfield and thereupon retired from the action with an almost audible sigh of relief, they did not, as the news services continued to state, reverse an earlier decision and declare William and Mary first.

Of the revised statement, only one thing is certain: to anyone except the rabid partisans in Connecticut and Virginia, the whole affair by now is beginning to seem much like the Mad Hatter's Tea Party. The original citation referred to "Tapping Reeve’s law school, the first in the United States," and continued for about 350 words reviewing the distant accomplishments of the institution which it traced from 1784 to 1833. The corrected statement in the citation — which, in the view of William and Mary officials, gave to Litchfield the priority which it could in full honor claim — referred to "Tapping Reeve’s proprietary law school, the first in the United States not associated with a college or university."²³


The corrected citation satisfies only those who wish to be satisfied, as the varying newspaper treatments of the whole thing demonstrate.²⁴ From which one may be prompted to repeat Alice's observation after the abovementioned Tea Party: "Everything's got a moral, if you can only find it."
Colonial lawyers prepared for their careers in one of two ways: either they worked in the office of an established practitioner until by systematic direction (which was probably rare) or by a kind of osmosis they absorbed a feel for and a technical knowledge of the law sufficient to appear before the appropriate local authorities to seek admission to practice. Or, if the financial means and the opportunity were available, they might register at one of the Inns of Court and pursue their formal training in the mother country.25

The office clerkship or apprenticeship was the more common, for obvious reasons, and many of the best attorneys in the colonial period, as well as many in the early nineteenth century, learned their law in this manner. Tapping Reeve, for example, studied under Judge Root of Hartford; George Wythe under Stephen Dewey; John Adams under James Putnam; and Edmund Pendleton under Col. Benjamin Robinson. Adams put in two years of study, Pendleton seven; but both Reeve and Wythe apparently had short apprenticeships.26

Thomas Jefferson, whose own legal study under Wythe was for five years from 1762 to 1767, viewed the needs of education in the new nation pragmatically; he proposed to convert the former royal college in Virginia into a school for public service and to revise its classical-medieval curriculum to provide for studies in science, economics and related subjects. As second governor of Virginia in 1779 and also a member of the board of visitors of the institution, he

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25 A representative listing of the colonies of origin for registrants listed in Jones, American Members of the Inns of Court (1924) for the period 1750-75 is as follows: Massachusetts 2, New Hampshire 1, New York 9, New Jersey 2, Pennsylvania 18, Maryland 17, Virginia 23, North Carolina 4, South Carolina 44, Georgia 6.

had full freedom to undertake the modernization of the William and Mary curriculum. As he later wrote:

Being elected . . . one of the Visitors of Wm. & Mary college, a self-electing body, I effected, during my residence in Williamsburg that year, a change in the organization of that institution . . . substituting a professorship of Law & Police [for the chair of theology].

The record shows that, within the month, the man appointed to this chair presented himself to the faculty and formally entered upon his duties. He was, almost certainly, regarded by everyone as *primus inter paribus*; one of the leaders of the Virginia bar with more than twenty years of practice and a substantial amount of legislative experience, George Wythe had the previous year been appointed one of the three judges of the new Virginia High Court of Chancery. As early as 1754 he had served a few months as attorney-general of the colony and had been elected to his first term in the House of Burgesses; for sixteen years, to the eve of the Revolution, he had been the clerk of the House. From mid-1775 to the end of 1776 he was a member of the Continental Congress, and his name was among the signers of the Declaration of Independence. His personal erudition was almost legendary, and for many years the kindly, twice-widowed lawyer had boarded many youths who pursued their studies of classics or law under him. One of these, who in due course took both studies in his home, wrote graphically of Wythe's teaching techniques:

... I attended him every morning very early, and always found him waiting for me in his study by sunrise. When I entered the room, he immediately took from his well-stored library some Greek book, to which any accidental circumstance first directed his attention. This was opened at random, and I was bid to recite the first passage that caught his eye. Although utterly unprepared for such a

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27 *Writings of Thomas Jefferson* 69 (Ford, ed. 1892).
28 Minutes of Faculty for Dec. 29, 1779; MS in Library of College of William and Mary; printed in *Wm. & Mary Coll. Q.* (1st ser.) 169 (1905).
task, I was never permitted to have the assistance of a Lexicon or a grammar but whenever I was at a loss, he gave me the meaning of the word or structure of the sentence which had puzzled me. . . . Whenever in the course of our reading any reference was made to the ancient manners, customs, laws, superstitions or history of the Greeks, he asked me to explain the allusion, and when I failed to do so satisfactorily (as was often the case) he immediately gave full clear and complete account of the subject to which reference was so made. Having done so, I was bidden to remind him of it the next day, in order that we might then learn from some better source, whether his explanation was correct or not; and the difficulties I met with on one day, generally produced the subject of the lesson of the next.29

Jefferson, studying under Wythe, had been exposed first to Coke's famous Institutes in their entirely, and then, to bring the statement of the common law up to date, Matthew Bacon's New Abridgement of the Law, a work which Jefferson later described as "the Manual of every judge and lawyer."30 That Wythe's law library continued to grow throughout the ensuing period is indicated by the list of law books which he ordered on several occasions from London.31 In 1779, a few months before he was named professor of law at the College of William and Mary, he had completed, in company with Jefferson and Edmund Pendleton, a monumental project involving the analysis and plan for revision of the English common law as it was to be adopted by the new Commonwealth. Wythe's particular assignment on this committee of revisors had been the English legal materials from the Cromwellian Revolution to 1776;32 and thus the

29 Littleton Waller Tazewell Diary for 1786; MS in Library of College of William and Mary.
30 Jefferson to Thomas Cooper, Jan. 16, 1814; 14 WRITINGS OF THOMAS JEFFERSON 54, 57 (Bergh, ed. 19...).
31 In an order to John Norton, his agent in London, Wythe on Aug. 3, 1769 ordered half a dozen of the most recently published English reports—e.g., by Andrews, Atkyns, Burrows, Fortescue and others. On May 25, 1772, he ordered a number of classic legal works, e.g., Glanville, Bracton, Britton and Fleta. MSS in Norton Papers of Colonial Williamsburg, Inc., cited in Hemphill, George Wythe, the Colonial Briton (Ph.D. diss. 1937), 251, 257.
32 MAYS, loc. cit., II, 138-41.
new professor of law brought to his chair valuable perspectives provided by this recent task.

What Wythe as professor taught to his students, all young men planning soon to qualify for the bar, is to be taken from collateral documents, since no authenticated copy of his lectures has been found. In addition to John Marshall, whose only formal law study was at William and Mary immediately after Wythe took his seat, there was Spencer Roane, later Marshall's great antagonist from his position on the Virginia bench; John Breckenridge, the future leader of Kentucky law and politics; and John Brown, one of Kentucky's first United States Senators. A decade later, when Wythe resigned his professorship to move to Richmond, he continued his lifelong instinct for teaching and — shades of Tapping Reeve! — set up his own law school in his home there; one of his students in this final period of his educational career was a young man named Henry Clay.

Of Wythe as a teacher at William and Mary, Brown described his moot courts and legislative practice sessions as techniques ahead of their time. “Mr. Wythe and the other professors sit as judges,” Brown wrote. “Our audience consists of the most respectable of the citizens, before whom we plead causes given out by Mr. Wythe.” Even more significant is the insight into the content of the law course provided by Marshall's law notes, begun during his residence at the College and continued up to the time of his taking the bar that summer. The notes are taken, for the most part, from the third edition of Bacon's Abridgement.

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33 Cf. A Provisional List of Alumni . . . of the College of William and Mary in Virginia From 1693 to 1888 (1941).
34 It was stated as late as 1810 that a manuscript copy of Wythe's lectures was extant, and its publication was urged. John Tyler to Jefferson, Nov. 12, 1810, reprinted in 1 Letters and Times of the Tylers 249 (Tyler Ed. 1884); Jefferson to Tyler, Nov. 25, 1810, reprinted in Ford, loc. cit., IX, 288.
36 Brown to Col. William Preston, July 6, 1780; 9 Wm. & Mary Coll. Q. (1st ser.), 80 (1900).
modified at appropriate points by excerpts from the *Acts of the Assembly Now in Force in the Colony of Virginia*, published by authority of the colonial legislature in Williamsburg in 1769 — and, toward the end, a slight number of quotations from Blackstone.\(^3\)

Wythe continued in his professorship for more than ten years, resigning in 1790-91 to move to Richmond under the pressure of his duties as presiding Chancellor of the High Court. His successor was a student from his pre-law school period, St. George Tucker, whose own contributions to legal education were substantial: Tucker appears to have guided the College to the devising of a formal law degree to be given to students completing the full course, and he was to become, in 1803, the editor of the first American edition of Blackstone.\(^4\)

Seven other teachers of law were to follow Tucker in the chair at William and Mary until, in 1861, the College closed its doors and students and faculty went off to war.\(^5\) Over the eighty years in which the law program flourished, nearly two thousand men were enrolled, and the alumni numbered attorneys, judges and government officials in states as far west as Missouri and Texas, as well as providing the first faculty members for the law schools at several nineteenth-century law schools. With the ruin of the Civil War and Reconstruction, however, the College fell into a long sleep.

When one compares the personal histories of Wythe and Tapping Reeve, there are striking parallels: both had a parent die in his own early childhood (a common enough

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\(^3\) Swindler, *loc. cit.* n. 35 supra.

\(^4\) Cf. Swindler, *St. George Tucker, States' Rights Spokesman*, a paper delivered Nov. 11, 1966 at the dedication of the Tucker-Coleman Room in the Library of the College of William and Mary; to be published by the College in the spring of 1967.

\(^5\) The faculty after Tucker, until 1861, included William and Robert Nelson, local attorneys; James Semple, a leader of the Virginia bar; Nathaniel Beverley Tucker, son of St. George and author of *The Principles of Pleading* (1846); George P. Scarburgh, later a leading jurist; Lucian Minor, founder of an illustrious family of attorneys; and Charles Morris, a local lawyer.
tragedy, of course, in colonial times); each married twice but had only one son — Wythe's dying in infancy and Reeve's growing to manhood and also having a son who, however, died without issue; each had a significant career in law, on the bench, and in government; each was, obviously, an instinctive and compulsive teacher; and each closed his career in something of a tragedy — Reeve, apparently, being in straitened circumstances during the last years of his life, and Wythe being poisoned by a nephew impatient for a supposed legacy.40

There is reasonable evidence that the law programs developed by both Wythe and Reeve were also strikingly parallel: Each covered the whole range of the common law, with particular emphasis upon the variances in the practice within their own jurisdictions; both teachers relied upon moot courts for practical training; and a substantial library of basic law books was available to the students in each institution. Finally, the students were systematically directed in the composition of their notes into basic reference books for their own future use.41

The chief difference between the law schools in Litchfield and in Williamsburg is that the one was proprietary — which is to say, operated by a private individual — while the other was a formal unit within a long-established institution of higher learning. This difference was of no particular significance in the context of a new nation requiring centers for professional study wherever a component teacher could be found. It was only after the nineteenth century was well advanced, and other universities had established law schools which in time came to require an undergraduate preparation as a requisite for admission, that the unaffiliated professional schools (of law and medicine alike) began to fall into decline.

41 Cf. nn. 6-8, 15, 18, 26-36 supra.
Epilogue

To return to Alice in Wonderland: Everything, indeed, does have a moral, if it can only be found. The moral in the case of the exaggerated controversy between partisans of these first law schools would seem to be, that enthusiasts after the fact should not claim more than history will substantiate. More than that: in the course of the dispute, the significant contributions of the two gentlemen of the eighteenth century tend to be forgotten. One may fancy that if these two had ever met in life, they would have found in each other kindred spirits and would have gone off arm in arm under the lovely trees of the Litchfield Hills or the warm sunshine of Tidewater Virginia, engrossed in a discussion of their lifelong interest, the “lady of the common law” as Lord Coke put it.

One may certainly conjecture that Wythe and Reeve would have been excruciatingly embarrassed at the latter-day controversy. The modern age needs to pay homage to both — at Reeve’s house and law school so faithfully preserved in Connecticut, and at Wythe’s house in restored Williamsburg, or the Great Hall in the Sir Christopher Wren building on the William and Mary campus where he transferred his teaching in 1779.

What was literally first in American history will perhaps always be a relative matter. If one wishes to see “the oldest house in the United States,” he may take his choice between one in St. Augustine, Fla. and one in Albuquerque, N. M. The hopelessness of reconciling these claims (in these cases, substantially a promoters’ dispute) is offset by the hope that some visitors to either site may have the deeper purpose of inspecting the evidence of Spanish culture and its contribution to American life.

Amid the clamor of rival claims in the latter days, a still small voice may be heard saying, “Beware, lest you take yourselves too seriously,” Or, as Oliver Cromwell once admonished his followers: “I beseech you, in the bowels of Christ, think it possible you may be mistaken.”