‘The Kindred Spirit Tie of Congenial Principles’

‘The word citizen’, the mid-August 1789 issue of one of the most eagerly read journals of the early years of the French Revolution *Révolutions de Paris* stated, ‘expresses the quality of an individual considered as a participant in legislative or sovereign power’. ‘It is thus an absurdity to speak of a *citizen of Paris* [...] We are *citizens of France*’.¹ That same year, the first historian of the American Revolution, David Ramsay, declared: ‘A citizen of the *United States*, means a member of this new nation. The principle of government being radically changed by the revolution, the political character of the people was also changed from subjects to citizens’. In Ramsay’s view, ‘The difference is immense’. Subject means ‘one who is *under* the power of another; but a citizen is an *unit* of a mass of free people, who, collectively, possess sovereignty’.² Six years later, in February 1795, one month after the outbreak of the Batavian Revolution, the Dutch journal *De republikein* (The republican) told its readers in a similar vein that, ‘As thoughtful, enlightened, and free Citizens, you are in command of the organization of government’, an ‘inalienable right of every Nation’. The ‘Republican’, the article went on, a ‘FREE MAN’, ‘recognizes in society no-one except as his *equal*’ and ‘knows no more magnificent title than *Citizen*’.³

Citizen was a key concept in the revolutionary vocabulary employed in the late eighteenth-century American, French, and Dutch revolutions. In the late 1780s and early 1790s, a considerable and influential group of American, Dutch,

- 1 *Révolutions de Paris*, no. 6, 16–22 August, 1789, p. 10 (italic in original). On *Révolutions de Paris*, see J. Censer, *Prelude to Power. The Parisian Radical Press, 1789–1791* (Baltimore, MD: Johns Hopkins University Press, 1976); H. Guénot, ‘Révolutions de Paris (Les)’ in: A. Soboul (ed.), *Dictionnaire historique de la Révolution française* (Paris: Presses Universitaires de France, 1989), pp. 907–908; P. Rétat, ‘Forme et discours d’un journal révolutionnaire: Les *Révolutions de Paris* en 1789’, in: C. Labrosse, P. Rétat, and H. Duranton (eds.), *L’instrument périodique: La fonction de la presse au XVIII^e siècle* (Lyon: Presses Universitaires de Lyon, 1986), pp. 139–178.
- 2 D. Ramsay, *A Dissertation on the Manners of Acquiring the Character and Privileges of a Citizen* (n.p., 1789), p. 3 (italic in original). On Ramsay, see A.H. Schaffer, *To be an American: David Ramsay and the Making of American Consciousness* (Columbia, S.C.: University of South Carolina Press, 1991).
- 3 *De republikein* 1, no. 2, p. 18 (italic in original). On *De republikein*, see R. Koekkoek, ‘“Eene waare en vrije Republiek”. Jan Konijnenburg, *De republikein* en de uitvinding van de moderne republiek’, *De achttiende eeuw* 42 (2010), pp. 236–260; S. Vuyk, ‘*De republikein* van Jan Konijnenburg (februari 1795–augustus 1797)’, in: P. van Wissing (ed.), *Stooschriften: pers en politiek tussen 1780 en 1800* (Nijmegen: Vantilt, 2008), pp. 217–229.

and French politicians, journalists, publicists, and political thinkers began to articulate conceptions citizenship in terms of the rights of man, civic equality, popular sovereignty, nation and constitution. Importantly, they explicitly drew attention to the wider Atlantic revolutionary constellation in which they formulated these ideals. To their minds, their revolutions and revolutionary ideals transcended national boundaries. Often they referred to each other's revolutions as well as to each other's constitutions and declarations as examples and sources of inspiration. In part for strategic and rhetorical reasons, but also because many genuinely believed so, they argued that their 'national' cause of citizen emancipation was part of a momentous, Atlantic-wide upheaval.

Perhaps one of the most important Atlantic moments of converging revolutionary citizenship ideals was the summer of 1791, when a contentious debate was fought out in the American Republic's most prominent newspapers about Thomas Paine's recently published *Rights of Man*. At stake were the benefits and defects of the English constitutional system as defended by Edmund Burke, and the evaluation of the swift regime change in revolutionary France. In the midst of it, on July 5, 1791, an author under the pseudonym of 'Agricola' in *Dunlap's American Daily Advertiser*, a fairly established Philadelphian Republican newspaper, commented on the French Revolution:

The emancipation of so great a number of our fellow creatures, is a suitable, and it is a dignified subject of congratulation: – the late glorious revolution in France presents this grand subject of joy to the feelings of humanity. The regeneration of so great and powerful a kingdom – the renovation of its rights, and the exaltation of its slaves to the high and dignified character of citizens, are events so analogous to the experience of these United States, that true Americans cannot hear of them without taking a deep interest in their benefits, and bestowing the benevolent wish of 'Esto perpetua' to the newly risen glory of France, and the newly acquired liberty of their citizens!⁴

4 *Dunlap's American Daily Advertiser* (Philadelphia, Pennsylvania), July 5, 1791. The piece was reprinted in the foremost Federalist newspaper *Gazette of the United States* (Philadelphia, Pennsylvania) of July 23, 1791.

In many American newspapers Paine's *Rights of Man* was advertised as 'Response to Mr. Burke's Attack on the French Revolution'. Paine's pamphlet became a highly inflammable issue in American public debate as Secretary of State Thomas Jefferson had forwarded it to a publisher in Philadelphia accompanied by a note saying that he wished publication would help 'correct political heresies which have sprung up among us', referring to sitting vice president John Adams's *Discourses on Davila* (1790), a critical assessment of the French Revolution in which Adams advocated moderation and rule by a 'natural' aristocracy. The printer of

The next month, on August 30 and 31, both the *Gazette of the United States* and the *Federal Gazette* published a letter by the French National Constituent Assembly (signed by its president, Jean-Xavier Bureau de Pusy) to the members of the Pennsylvania House of Representatives. Earlier that year, Pennsylvanian representatives had expressed to their French fellow representatives 'their sympathetic feelings on the subject of their virtuous exertions in the cause of freedom' in a letter addressed to the National Assembly where it was read aloud on June 2.⁵ They had congratulated their French colleagues on their act of undertaking a revolution 'founded on that pure and elementary principle; that the people are the source of power'; and that this power is 'naturally inherent' in the people, and can only be derived from them. 'The truth of this hallowed maxim', according to the Pennsylvanian representatives, was also 'the pride and boast of our American constitutions'. At the end of the letter they had expressed their hope 'that other nations of Europe, from the influence of your example, will learn to value and vindicate the rights of man'.⁶

In their reply, signed on June 6 and published in American newspapers a little less than two months later, Bureau de Pusy let their Pennsylvanian fellow

Paine's pamphlet published Jefferson's note, thus putting Jefferson in an awkward position. Adams felt that a response would be beneath his dignity and would make the public impression of disunion only worse. But his son John Quincy Adams felt no such hesitations. In just over six weeks he penned down eleven essays (comprising almost sixteen thousand words) which were published in the Boston *Columbia's Centinel* between June 8 and July 27, 1791, under the pseudonym 'Publicola'. Numerous refutations and replies appeared in the *Columbian Centinel* ('Brutus'), and the *Independent Chronicle* ('A Republican', 'The Ploughman', 'The Watchman'). 'Agricola's' piece in *Dunlap's American Daily Advertiser* was also addressed to Publicola. For background, see M. Daniel, *Scandal & Civility. Journalism and the Birth of American Democracy* (Oxford: Oxford University Press, 2009), 72–76; C.N. Edel, *Nation Builder. John Quincy Adams and the Grand Strategy of the Republic* (Cambridge, MA: Harvard University Press, 2014), pp. 55–77. A collection of seven of Adams's letters appeared in a Dutch translation (under his father's name): J. Adams, *Antwoord op het werk van den heer Thomas Paine, getiteld Rechten van den mensch* (Haarlem: Walgré, 1793).

5 The letter, signed by the Speaker of the Pennsylvanian House of Representatives, William Bingham, was sent by the French ambassador in the United States to the President of the French National Assembly. A translation of the letter was read by the President immediately after he had read another letter by Thomas Jefferson expressing his gratitude to the Assembly for paying homage to Benjamin Franklin who had passed away in April the year before. After the reading of the letter of the Pennsylvanian legislature, the liberal constitutional monarchist Fréteau de Saint-Just (not to be confused with Louis Antoine Saint-Just), argued for multiplying commercial relations with a people who shared a similar political outlook and similar principles. At his instigation, the National Assembly decreed the king to open renegotiations with the United States on a new commerce treaty. J. Madival et al. (eds.) *Archives parlementaires de 1787 à 1860*, 127 vols. (Paris: Librairie administrative de P. Dupont, 1862) [hereafter: *AP*, followed by volume number], vol. 26, pp. 708–709.

6 *The Gazette of the United States* (Philadelphia, Pennsylvania), April 23, 1791.

representatives know on behalf of the French National Assembly that 'it was grateful [...] to hear, resounding from afar, prompted by fraternal affection, the congratulatory voice of America' (I insert the French original where the translation deviates).⁷ Bureau de Pusy answered that 'We too are establishing (under the constitutional authority of a king) that liberty which you have been able to secure under governments of a republican form'. According to the National Assembly's President, Frenchmen and Americans agreed on several principles, namely that liberties are not to be derived from 'chartered grants or privileges', on the 'sacred sovereignty of the people' (*'l'éternelle souveraineté'*), and on the 'equality of ranks' (*'l'égalité civile'*). But it was only in the 'trans-Atlantic world' (*'Il fallait traverser l'océan'*) – 'T was there, amongst an infant people, pure and incorrupt, that the higher virtues were to be found' and the 'seeds of this precious Liberty' could flourish. He admitted that 'France is fully sensible (*'n'oublier point'*) of the benefits she has derived from the influence of your example: she gratefully remembers that it was in the bosom of Pennsylvania, distinguished for her wisdom, that the legislators of America first announced to the world, the true principles of the social system (*'l'art social'*)'.⁸ He admitted that France had some difficulties 'to copy the example'. It took 'the enlightened energy and unremitting efforts of a numerous people' to bring about a revolution. 'But at length the revolution is effected, and already do the rights of man, engraved on the most durable materials adorn the temples of liberty in the two hemispheres'. The National Assembly ended its reply by restating the hope that the two countries would ever closely unite 'by the kindred spirit tie of congenial principles, increase their mutual relationship, cement their interests, and perpetually recall to their recollection, that they are reciprocally indebted to each other for the recovery of their freedom (*'qu'elles sont libres l'une pour l'autre'*)'.⁹

Yet another four months later, on December 7, 1791, the Dutch journal *De leerzame praat-al* (The educational chatter box), edited by Bernardus Bosch, a protestant minister, Patriot publicist, editor, and future leading Batavian revolutionary, published an article entitled 'On the natural rights of man

⁷ For the French text, see *AP* 27, p. 14.

⁸ French *américanistes* had praised the 1776 Pennsylvanian constitution since the mid-1780s for its unicameral legislature, which offered an important counterpoint to the British model. The 1790 amendments to the Pennsylvanian constitution, however, introduced a bicameral legislative. The term *l'art social* was the key term with which the *Journal de la Société de 1789* was concerned. Sieyès and Condorcet founded the *Société de 1789* and made most contributions to its journal. See K.M. Baker, 'Politics and Social Science in eighteenth-century France: The Société de 1789', in: J.F. Bosher (ed.) *French Government and Society 1500–1850* (London: Athlone Press, 1973), pp. 208–230.

⁹ *The Federal Gazette and Philadelphia Daily Advertiser* (Philadelphia, Pennsylvania), August 30, 1791; *The Gazette of the United States* (Philadelphia, Pennsylvania), August 31, 1791.

and citizen'. It lashed out at Burke, maintaining that his attack on the French Revolution was completely unfounded, as Thomas Paine's *Rights of Men* had shown, a pamphlet 'every Patriot must read'. Recalling the venerable deeds of Washington and Lafayette during the American and French revolutions, the article reproduced the 1789 French Declaration of the Rights of Man and Citizen which 'every member of a society must imprint in his heart'.¹⁰ In a pamphlet published two years later, Bosch under the pseudonym of *Vrijhart* (free heart) underscored the Dutch Republic's need for a 'true constitution'. Only under a true constitution equality '*as human beings*' could be safeguarded; only under a true constitution, citizens could 'enjoy their natural rights' and 'unite as one body'. A constitution would enable 'the people', 'THE SUPREME SOVEREIGN', to elect their representatives. 'America' had led the way in this respect, Bosch explained just like the French National Assembly's letter to the Pennsylvanian House of Representatives had done a few years earlier. But it was France who 'let us contemplate a well-organised society, provided us with a perfect body; let us contemplate a *Constitution*, in which the natural rights [and] the dignity of humanity are splendidly restored'.¹¹ After laying out the plan for arriving at a constitution for the Dutch, Bosch claimed that such a constitution 'will elevate the name of citizens'.¹²

The language of the letters exchanged between the French National Assembly and the Pennsylvanian House of Representatives was similar to that of the Dutch publicist Bosch, similar to that of 'Agricola', and similar to that of Ramsay, *Révolutions de Paris*, and *De republikein*. Whether they had already gone through a revolution, were in the middle of it, or were planning one, these politicians, journalists, and publicists came to share the ideal that popular sovereignty was vested in the body of citizens; they agreed upon the equal civic standing of citizens and their entitlement to the rights of man; and they were convinced that these principles needed to be cemented in a formal written constitution. And they were keen to point out that in pushing these ideals they took part in a larger transatlantic revolutionary moment.

Remarkably, the Americans, Frenchmen, and Dutchmen who considered themselves to be involved in such a transatlantic project did so while coming from very different political backgrounds, drawing on diverse institutional and intellectual traditions of citizenship and subjecthood: they were (or used to be) subjects of an absolutist monarchy, 'settler-subjects' of overseas colonies

10 *De leerzame praat-al*, vol. 2, no. 49 (December 7, 1791), pp. 385–392, at pp. 387, 392 (italic in original). *De leerzame praat-al* appeared in Amsterdam between 1790 and 1792. It was co-edited by the female literary author and publicist Petronella Moens.

11 Anonymus [B. Bosch], *Vrijhart aan het volk van Nederland over de waare constitutie* (n.p., 1793), pp. 2–3.

12 [Bosch], *Vrijhart aan het volk van Nederland*, p. 35.

within a British empire, and citizens of a highly urbanized confederal Republic.¹³ Yet, despite the diversity of historical trajectories and backgrounds of notions of citizenship, many Americans, French and Dutch revolutionaries developed a mutual awareness and appreciation of a commonality of principles, of 'spirit', as it was often called. In their perception, however short-lived this perception turned out to be, they shared similar principles, spoke the same language, employed the same concepts, and pursued similar ideals.¹⁴

Of course, the practical and constitutional translation of these principles and ideals of citizenship was intensely debated and worked out differently in each country. What boundaries were set to the scope of citizenship varied too. But many of the specific details of the different regimes citizenship regimes were lost on Americans, Frenchmen, and Dutchmen commenting on each other, or deliberately and conveniently glossed over. What they recognized, shared, and propagated was not one formal constitutional definition of citizenship, but a transatlantic family of overlapping citizenship ideals.

It was this transatlantic mind-set or frame of mind – the sense of taking part in a common project – the parallel formation of which took place within what were still largely national communication communities, that was put to the test by the Haitian Revolution and the Terror. How did the discourse of this transatlantic mind-set take shape? What forms did it take?

1 Rights Declarations and the Constitutional Framework of Citizenship

Bernardus Bosch's 1791 contention that American revolutionaries had led the way in innovating constitutional thought was widely accepted among his fellow Dutch Patriots. In the late 1770s and early 1780s, the political ideas

13 R.R. Beeman, *The Varieties of Political Experience in Eighteenth-Century America* (Philadelphia, PA: University of Pennsylvania Press, 2004); J.P. Greene, *The Constitutional Origins of the American Revolution* (Cambridge: Cambridge University Press, 2010); Kettner, *The Development of American Citizenship*; Sahlin, *Unnaturally French*; M. Prak, *The Dutch Republic in the Seventeenth Century* (Cambridge: Cambridge University Press, 2005), esp. pp. 153–200; idem, 'The Dutch Republic as a Bourgeois Society', *BMGN/The Low Countries Historical Review* 125 (2010), pp. 107–138; C.C. Wells, *Law and Citizenship in Early Modern France* (Baltimore, MD: Johns Hopkins University Press, 1995); C. Yirush, *Settlers, Liberty, and Empire: The Roots of Early American Political Theory, 1675–1775* (Cambridge: Cambridge University Press, 2011).

14 Of course, other revolutionary movements in Austrian Belgium, Switzerland, and Poland could be mentioned. See A. Jourdan, 'Tumultuous Contexts and Radical Ideas (1783–1789). The "Pre-Revolution" in a Transnational Perspective', in: D. Andress (ed.), *The Oxford Handbook of the French Revolution* (Oxford: Oxford University Press, 2015), pp. 92–108.

employed – and symbolised – by revolutionary American colonists had fallen on fertile ground. The political concept of citizenship based on the rights of man and the principle of popular sovereignty as articulated in American state declarations and constitutions were particularly attractive to many Dutch patriots as well as reform-minded Frenchmen. The American state declarations and constitutions captured and summarized much of the spirit of the age. These documents gave succinct expression to some of the most important conceptual innovations at the time, including the concept of constitution itself. Widely translated, published, debated and commented upon, the American state declarations and constitutions of 1776–1780 stood out for their simplicity, convenient arrangement, and translatability. As David Armitage and Dan Edelstein have recently observed, declarations became a ‘genre’ onto itself: ‘a declaration is not too long; it is usually prefaced by a preamble; it is composed in short paragraphs or articles; and it is written in simple, axiomatic language’.¹⁵ Unlike philosophical tomes, these declarations were relatively straightforward and easily accessible to a broad public. Their form and universalistic language rendered them easily transferable to other countries.

It was not only the language and form of constitutions and declarations that could inspire, be copied, amended, and emulated. Declaring rights was also an ‘act’, as Lynn Hunt and Marcel Gauchet have emphasized.¹⁶ As manifesto’s they presented an ideological rupture, a founding moment of a new order. They could be invoked as a legitimation of revolutionary action. As such, they became transatlantic carriers of revolutionary principles underlying a conception of citizenship for a new era. They were vehicles of a converging, revolutionary citizenship discourse.

The innovation of enumerating rights in written documents should not be overstated. Declaring rights in charters, bills, and compacts was anything but new. In early modern Europe, it was a fairly common tradition stretching back to the Middle Ages through which rulers and subjects laid down in writing their rights and mutual obligations.¹⁷ These older compacts and charters, however, were always concluded with a lord or king whose promise to respect the rights and privileges of the other party – a guild, a city, an ecclesiastical order,

15 For genre, see D. Armitage, *The Declaration of Independence. A Global History* (Cambridge, MA: Harvard University Press, 2007), pp. 13–15. The latter quote is taken from D. Edelstein, ‘Enlightenment Rights Talk’, *The Journal of Modern History* 86 (2014), pp. 530–565, at p. 564.

16 M. Gauchet, *La révolution des droits de l’homme* (Paris: Gallimard, 1989); L. Hunt, *Inventing Human Rights: A History* (New York: W.W. Norton, 2007).

17 J. Rakove, *Declaring Rights. A Brief History with Documents* (New York: Bedford, 1998), pp. 7–14.

a group of nobles, a group of colonists – was essentially perceived to be the grant of a favour. The famous English 1689 Bill of Rights was a confirmation of existing rights, not the proclamation of the natural right of a people to institute a new government. The crucial difference between this older tradition and the late eighteenth-century American rights declarations was that the latter were no compacts with a ruler, but declarations of popular sovereignty. Even in France, where the king was only deposed in August 1792, one of the striking features of the text of the 1789 Declaration of the Rights of Man and Citizen is the categorical omission of the king.

The Constitutional Convention of Virginia, the largest, most populated, and wealthiest of the American colonies, was the first to proclaim a Declaration of Rights. Adopted on June 12, 1776 (three weeks prior to the Declaration of Independence), it declared that 'all men are by nature equally free and independent and have certain inherent rights [...] namely, the enjoyment of life and liberty, with the means of acquiring and possessing property, and pursuing and obtaining happiness and safety'. Not every American state constitution was preceded by a rights declaration, however, and not all rights declarations had their foundation in the universalistic notion of natural rights.¹⁸ Only Pennsylvania, Vermont, and New Hampshire appealed like Virginia to notions of natural equality and the natural rights of life and liberty, as would Massachusetts in 1780.

The Declaration of Rights contained in the constitution of Pennsylvania adopted in late September 1776 was the least complex and most democratic of all American state constitutions: it installed a unicameral assembly, omitted an executive veto, and held elections based on a wide franchise. It read 'That all men are born equally free and independent, and have certain natural, inherent and inalienable rights'.¹⁹ In yet another variation, the Massachusetts Declaration

18 It was not the case, as Annie Jourdan has asserted, that 'chaque État du Nouveau Monde ou presque a élaboré une constitution écrite, fondée sur les droits fondamentaux – naturels et inaliénables'. Jourdan, *La Révolution batave*, p. 39. The two states of Connecticut and Rhode Island did not frame new constitutions but stuck to an amended version of their colonial charters; Georgia, New Jersey, New York, and South Carolina adopted constitutions in which individual rights were protected in the constitutional texts themselves. B. Schwartz, *The Great Rights of Mankind: A History of the American Bill of Rights* (Lanham, MD: Rowman & Littlefield, 1992), pp. 67–81; W.P. Adams, *The First American Constitutions. Republican Ideology and the Making of the State Constitutions in the Revolutionary Era*, trans. R. Kimber (Chapel Hill, N.C.: The University of North Carolina Press, 1980). The point is that Dutchmen and Frenchmen who sympathized with the American independence movement were actually quite selective in what documents, constitutions, and rights declaration they translated and published.

19 The Constitution of Pennsylvania was drafted by the Pennsylvania Convention, chaired

of 1780 stated: 'All men are born free and equal, and have certain natural, essential, and unalienable rights; among which may be reckoned the right of enjoying and defending their lives and liberties'.

It is important to qualify the nature and weight of the natural rights language in American state declarations. Numerous American revolutionaries considered the appeal to the natural rights of man as an ultimate ground to justify their declarations of independence and their revolution in general. But in determining the specific form and meaning of citizens' rights, liberties, duties, and obligations, American state declarations and constitutions, as well as subsequent legal statutes and jurisprudence, heavily drew and improved upon the tradition of English common law. Many articles of the 1791 Bill of Rights, too, were inspired by and formulated in the language of 'English liberties'. In this respect, the French 1789 Declaration of the Rights of Man and Citizen differed in important ways from its American counterparts. For example, criminal procedural rights occupy a marginal place in the French Declaration (this applies to the 1795 Holland Declaration too). Instead, the French Declaration refers more abstractly to natural rights and the preservation of those rights in society, and deals more extensively with the law as the expression of the general will.²⁰ American state declarations and constitutions, then, were appealing not because of the legal intricacies, but because they coupled natural rights with the legitimacy of revolutionary action, popular sovereignty and representative government, thus envisioning a new model of citizenship.

2 Converging Revolutionary Citizenship Ideals

The revolutionary acts of American states declaring independence from the British Empire were welcomed enthusiastically by Dutch patriots. It seemed as if the newly independent American states had put into practice some of the more sweeping ideas they had read about in the works of political thinkers such as John Locke, Jean-Jacques Rousseau, Joseph Priestley, and Richard Price. The Dutch translation of Price's *Observations on the Nature of civil Liberty, the Principles of Government, and the Justice and Policy of the War with America* (1776), one of the most discussed pamphlets on the American Revolution in

by Benjamin Franklin. It abolished property qualifications for voting and holding office and extended full political citizenship to all white males over twenty-one who had lived in the state and had paid taxes for at least a year.

- 20 D. Edelstein, 'Early-Modern Rights Regimes: A Genealogy of Revolutionary Rights', *Critical Analysis of Law* 3 (2016), pp. 221–242; idem, *On the Spirit of Rights* (Chicago, Ill: Chicago University Press, 2019), pp. 166–193; Rakove, *Declaring Rights*.

England at the time, was carried out by the Dutch Patriot leader Joan Derk van der Capellen tot den Pol. Several years later this recalcitrant nobleman from the province of Overijssel would author the explosive 1781 pamphlet *Aan het volk van Nederland* (To the People of The Netherlands) that would catalyse the Patriot Movement. In the preface to Price's pamphlet, Van der Capellen explained that his translation was meant to enable his fellow Dutch citizens to take lessons from the 'true grounds of freedom and citizen-government' as displayed in the American Revolution.²¹

Van der Capellen tot den Pol's translation sought to appeal to considerable sections of the Dutch population that had grown increasingly unsatisfied with the established order. By the early 1780s, the Dutch press became outspokenly critical and hostile toward the alliance of oligarchic elites and stadholder William v of Orange.²² The devastating defeat against England in the fourth Anglo-Dutch Sea War (1780–1784) represented to many Dutchmen the ultimate proof of their republic's severe decline and its deeply corrupt political system. In various cities the opposition radicalized, as citizens began to organize in political societies and civic militias. They demanded a voice in the form of citizen councils and more transparent and strictly monitored forms of political representation and governance. Adopting the name of 'Patriots', the movement had a nation-wide appeal even though its strongholds were unevenly spread throughout the country. Their political reasoning remained by and large embedded within the familiar, decentralized framework of largely autonomous provinces. Until the mid-1780s, they still mainly drew on historical arguments and traditional liberties, seeking to 'restore' their 'ancient constitution' – the 1579 Union of Utrecht (which was in fact a treaty of alliance) – to its former lustre.

It was in this context that Dutch Patriots began to take a great interest in the American state declarations and constitutions that traversed the Atlantic. Newspapers with a European reach such as *Gazette de Leyde* and *Politique hollandaise* reported extensively on the American Revolution and introduced extracts from American rights declarations to their readership.²³ The first Dutch translation (from the French) of American constitutions, the *Verzameling van de constitutiën der vereenigde onafhangelijke staaten van Amerika* (Collection of Constitutions of the United Independent States of America) of 1781 prefaced

21 'Voorrede' in: R. Price, *Aanmerkingen over den aart der burgerlyke vrijheid, over de gronden der regeering, en over de rechtveerdigheid en staatkunde van den oorlog met Amerika*, trans. J.D. van der Capellen tot den Pol (Leiden: Herding, 1776), p. 4 [Dutch original: 'ware gronden der Vryheid en Burgerregeering te leren kennen'.]

22 Van Sas, *De metamorfose van Nederland*, pp. 173–221.

23 Jourdan, 'The Netherlands in the Constellation', p. 202.

the collection suggesting that 'these fine papers of a purified popular government [...] will stand the test of time and make the world a happy place'.²⁴ In a dedication to Benjamin Franklin that preceded the main text, the constitutions were praised as 'the most splendid monuments of human reason [...] the purest government of the people that has ever existed'.²⁵

The Leiden-based Patriot François Adriaan van der Kemp, a close associate of Joan Derk van der Capellen tot den Pol, contributed to the dissemination of the example of American rights declarations and constitutions by publishing his *Verzameling van stukken tot de dertien vereenigde Staeten van Noord-America* (Collection of Articles on the Thirteen United States of North America). One of John Adams's closest friends during his diplomatic mission in the Dutch Republic, Van der Kemp in his introduction spoke highly of the 'citizen's unalienable rights', including the 'inherent right' of violent resistance that some American constitutions had declared.²⁶ In his collection, he included the Massachusetts Declaration of Rights which asserted that the people are sovereign and that all magistrates, whether legislative, executive, or judiciary, are servants of the people.

The Massachusetts declaration and constitution were also approvingly cited by the Patriot, republican lawyer, and future revolutionary Rutger-Jan Schimmelpenninck in his 1785 dissertation *Verhandeling over eene welingerigte Volksregeering* (Treatise on a Well-Constituted Government of the People). Schimmelpenninck's treatise advocated a representative democracy, drawing, as so many Dutch patriots did at the time, on various sources, including Rousseau, Priestly, Price, and Hutcheson. Yet, on several occasions Schimmelpenninck felt it useful to highlight the similarities between his ideas and the Massachusetts constitution's articles on sovereignty, freedom of opinion, and manners of voting. At the end of his treatise, he maintained that a 'solid bulwark of freedom' and a 'durable form of government' can only be secured by prescribing certain 'regulations' and 'foundational rules', arguing that a government's deviation from these rules would constitute a crime. An 'excellent' example of such regulations and rules, Schimmelpenninck informed his readers on the treaty's very last page, was given by the drafters of the Massachusetts and Pennsylvania constitutions. The substantial differences between the

24 *Verzameling van de constitutiën der vereenigde onafhankelijke staeten van Amerika*, 2 vols. (Dordrecht: F. Wanner, 1781), p. 3. This collection was a translation of the 1778 *Recueil des loix constitutives des colonies angloises*, translated by a certain Mr. Régnier.

25 'Opdragt van den Franschen vertaaler aan den heere Dr. Benjamin Franklin', in: *Verzameling van de constitutiën der vereenigde onafhankelijke staeten van Amerika*, vol. 1.

26 F.A. van der Kemp, *Verzameling van stukken tot de dertien vereenigde Staeten van Noord-America* (Leiden: L. Herdingh, 1781), xi, xl.

Massachusetts and Pennsylvania constitutions in terms of legislature, balance of powers, and franchise were completely disregarded by Schimmelpenninck. It indicates that the wide range of constitutional options offered by the American states did not prevent Dutch patriots, as well as French reformers, to consider them more broadly, as part of one revolutionary project that left several options open.²⁷

By 1786–1787, the political language of Dutch Patriots had become a mixture of militant urban republicanism, a defence of traditional privileges, as well as calls for popular sovereignty based on what were dubbed inalienable, and occasionally, 'natural' rights.²⁸ Although the Patriot Movement was eventually crushed by the armies of king Frederick William II of Prussia who came to the aid of his sister Princess Wilhelmina (the wife of Stadholder William V), the experiment in the 'new world' remained a source of inspiration for former Dutch Patriots. The American Revolution, after all, was not without its success; it remained a sign of political progress and the possibility of change. The Patriot and future Batavian revolutionary Herman Hendrik Vitringa would later recall that it was during this period that 'the spirit of the age was progressing'. The 'political concepts' that defined this spirit, Vitringa maintained, were brought into vogue by 'the philosophers of these days'. But they were 'in no small part developed by the North-American spirit of freedom'.²⁹

This is also what the American Revolution came to represent in France: the embodiment of some of the bolder philosophical and political ideas circulating at the time, the putting into practice of political concepts, the sign of progress. During the 1780s, France witnessed an outburst of both travel reports as well as more general political-philosophical and sociocultural reflections on the United States. Some of these authors, among them Jacques-Pierre Brissot, Marie-Jean-Antoine Nicolas de Caritat, marquis de Condorcet, Philip Mazzei, Gabriel Bonnot de Mably, Pierre Samuel Dupont de Nemours, and François Jean de Beauvoir, marquis de Chastellux, were to assume leading roles in French revolutionary politics and constitutional committees the following years.³⁰ This group of *américanistes*, as Durand Echeverría explained some

27 R.J. Schimmelpenninck, *Verhandeling over eene wel ingerigte volksregeering* (Leiden: F. de Does, 1785), pp. 83–84.

28 Klein, *Patriots repulikanisme*; I.L. Leeb, *The Ideological Origins of the Batavian Revolution. History and Politics in the Dutch Republic 1747–1800* (The Hague: Nijhoff, 1973); Velema, *Republicans*, pp. 139–158.

29 H.H. Vitringa, *Gedenkschrift van Herman Hendrik Vitringa*, 4 vols. (Arnhem: Nijhoff 1857–1864), vol. 1, p. 100.

30 D. Lacorne, *L'invention de la république. Le modèle américain* (Paris: Hachette, 1991), pp. 77–84.

decades ago, were not always in agreement with each other on how to interpret American affairs, nor did they form a party; they rather tended to meet at particular venues. Yet, for all of them the new independent states on the other side of the Atlantic were objects of critical admiration and wonder, models of reform, and a world onto which they could project their ideals.³¹

The American state constitutions and declarations in France, too, incited extensive comments and debates.³² They were published with the support of Benjamin Franklin in *Affaires de l'Angleterre et de l'Amérique*, a journal dedicated to the British-American conflict that ran from 1776 to 1779. They had also become available through the translations of the Duke of Rochefoucauld, whose *Constitutions des treize États-Unis de l'Amérique* appeared in 1783, again with the aid of Franklin.³³ In particular Condorcet, the most outspoken exponent of French 1780s *américanisme*, and one of the foremost political and constitutional thinkers of the French Revolution, was deeply inspired by the American Revolution. In his *Influence de la Révolution d'Amérique sur l'Europe*, published in 1786, he wrote:

[I]t is not enough for these rights to be written in the books of philosophers and in the hearts of men, ignorant or weak men must be able to read them in the example of a great people. America has given us this example. Its Declaration of Independence is a simple and sublime exposition of these rights, so sacred and so long forgotten. No nation has known them so well or preserved them with such perfect integrity [...] The example of a great people among whom the rights of man are respected is useful to all others despite differences in climate, manners, and constitution. It shows that these rights are everywhere the same.³⁴

Condorcet fully subscribed to the need for a *French* declaration of rights and was deeply impressed by the constitution of Pennsylvania. In *Idées sur le despotisme*, a pamphlet that came out in 1789, he explained:

The only way of preventing tyranny, that is to say, the violation of men's rights, is to bring all of these rights, together in a declaration, to promulgate them widely, clearly and in detail, to publish this declaration with

31 D. Echeverria, *Mirage in the West. A History of the French Image of American Society to 1815* (New York: Octagon Books, 1966), pp. 39–78.

32 Echeverria, *Mirage in the West*, pp. 161–174.

33 *Constitutions des Treize États-Unis de l'Amérique*, trans. La Rochefoucauld (Paris: Pierre, 1783).

34 Condorcet, *Writings on the United States*, ed. and trans. G. Ansart (Philadelphia, PA: Pennsylvania State University Press. 2012), p. 25.

great solemnity, and to embody in it [the principle] that the legislative power, in whatever form it takes, will never be able to pass a decree contradicting any of the articles.³⁵

Praise for the form, content, and example of American state constitutions was also expressed in the popular *Recherches historiques et politiques sur les États-Unis de l'Amérique Septentrionale*, a history of the American Revolution by the Italian diplomat (and friend of Thomas Jefferson) Philip Mazzei, who resided in Paris at that time. Mazzei's publication, in which Jefferson was closely involved, and which was partly translated by Condorcet and his wife Sophie de Condorcet, reproduced the Virginia Declaration of Rights. Mazzei added that 'all states [...] adopted the same laws' and that 'the exceptions consisted only of too slight differences to be essential'. On the United States Mazzei remarked, after laying out the principles of popular sovereignty and the general right of every citizen to vote and being voted into office, that 'There is only one class of citizens'.³⁶ He furthermore accentuated the natural and inalienable character of the rights as proclaimed in declarations, and stressed that the drafting of constitutions was to be done by a special convention, not by an ordinary legislature which ought to be forbidden from changing the constitution.

Enumerating the rights of citizens quite literally became a Dutch-French affair. Caught up in it, among others, was the French nobleman Honoré-Gabriel Riqueti, comte de Mirabeau (1749–1791), the future leading moderate revolutionary advocating a constitutional monarchy and one of the most famous orators of the early stages of the French Revolution. His 1788 pamphlet *Aux Bataves sur le stathouderat* was immediately translated into Dutch. It leaned heavily on the language of American state constitutions. Toward the end of his pamphlet Mirabeau added a (quite unsystematic) list of rights and recommendations, a '*déclaration des droits de tout people qui veut la liberté*'. Mirabeau's declaration of 26 articles, which was surely intended to reach a broader public than just the 'Batavians', commenced by announcing that 'all men are born free and equal'. It further maintained that all magistrates must be held accountable

35 Condorcet, *Idées sur le despotisme*, in: *Œuvres de Condorcet*, ed. A. Condorcet O'Connor and F. Arago, 12 vols. (Paris: Firmin Didot Frères, 1847), vol. 9, pp. 147–173, at p. 165. Translation taken from: 'On Despotism', in: *Political Writings*, ed. S. Lukes and N. Urbinati (Cambridge: Cambridge University Press, 2012), p. 175. Cf. 'Recognition of these rights is the basis of all societies, the only bastion that citizens have against the unjust laws which their representatives might be tempted to pass'. In: *Reflexions sur ce qui a été fait, et sur ce qui reste à faire*, as cited in: D. Williams, *Condorcet and Modernity* (Cambridge: Cambridge University Press, 2004), p. 52.

36 P. Mazzei, *Recherches historiques et politiques sur les États-Unis de l'Amérique Septentrionale* (Paris: Froullé, 1788), pp. 166–168.

for their conduct. The people have the 'indissoluble right' to 'reform, improve, and transform entirely' their own government. They furthermore have the right to elect, and to be elected as, public officials. The declaration also listed the rights of association, deliberation, and bearing arms; a right to a fair, competent, and independent judicial system, and press freedom; it finally contained a safeguard for private property and a verdict against privileges and hereditary titles.³⁷

For those who read Mazzei and Mirabeau the British-American colonies were no doubt still an 'example from afar' ('*voorbeeld in de verte*'), not only in distance, but also mentally.³⁸ Dutch Patriots were no colonial subjects and were not fighting an increasingly authoritarian, constitutional-monarchist regime seated in a distant metropole. Unlike American colonists, they had been citizens of an independent republic for (de facto) almost two centuries. No one could furthermore possibly deny the immense environmental and physical differences between the American states and the Dutch Republic. For French aristocrats and urban intelligentsia too, it was hard to imagine a society that was socially and culturally more in contrast with France, than North America. The picture of life in the North-American colonies that emerged in publications such as the expanded French edition of St. John de Crèvecoeur's *Lettres d'un cultivateur américain* (carefully tailored to the expectations and taste of a French audience) was one of simplicity, frugality, and egalitarian social relations; of living an idyllic, independent, agricultural life, in harmony with nature. For readers of Rousseau this virtuous and simple farmer was a recognizable figure, but also a far cry from the court life, salons, and complex *moeurs* and *sociabilité* of French elite society.³⁹ French and Dutch revolutionaries such as Mirabeau, Condorcet, Schimmelpenninck and Bosch never desired to simply copy the American examples. After all, declarations of rights

37 Mirabeau, *Aux Bataves, sur le stadhouderat* (Amsterdam: n.p., 1788). It was immediately translated as *Aan de Batavieren, over het stadhouderschap* (Antwerpen: P. Rymers, 1788).

38 'Example from afar' is the title of the most comprehensive historical account of Dutch perceptions of the American Revolution: J.W. Schulte Nordholt, *Voorbeeld in de verte. De invloed van de Amerikaanse revolutie in Nederland* (Baarn: In den Toren, 1979).

39 J. Hector St. John de Crèvecoeur, *Letters from an American Farmer: Describing certain Provincial Situations, Manners, and Customs, not generally known; and conveying some Idea of the Late and Present Interior Circumstances of the British Colonies of North America* (London: T. Davies, 1782). A French translation appeared in 1785: *Lettres d'un cultivateur américain* (Maastricht: J.E. Dufour & P. Roux, 1785). It was translated into Dutch in 1784: *Brieven van eenen Amerikaanschen landman van Carlisle in Pennsylvanien; geschreven aen eenen zijner vrienden in Engeland; behelzende den toestand, zeden, landbouw, en gewoonten der inwoonders van eenige der nu Vereenigde dertien gewesten van Noord Amerika, voor en in den nu geëindigden oorlog* (Leiden: L. Herdingh, 1784).

offered no full-fledged models of citizenship and American state constitutions displayed a variety of different definitions of citizenship. But they provided examples worth following; not in every detail, but on the level of general principles.

However great the perceived and real differences, the independent American states represented freedom, the progressing 'spirit of the age', and the successful application of 'political concepts' forged by philosophers, such as popular sovereignty and political freedom. This image of the American Revolution matched up well with the republican citizenship rhetoric that had taken shape in the preceding decades in the works of Jean-Jacques Rousseau, Denis Diderot, Gabriel Bonnot de Mably, and Guillaume-Joseph Saige. Its natural rights language echoed the natural law discourse of the *économistes* (or physiocrats).⁴⁰

For the Dutch, moreover, the struggle for independence of a confederacy of autonomous states against a foreign king reminded them of their own revolt against Philips II of Spain in the late sixteenth century. In his 1782 lyrical poem dedicated to the 'freedom proclamation of North America', the Dutch publisher and poet Adriaan Loosjes, for example, asked his fellow citizens to behold the free states of North America 'as a country, like yours, touched by the ray of liberty, and to see in their state and destiny your own image'. In Loosjes' estimation 'everyone recognizes the fortune of this State originating from American freedom'.⁴¹ Joseph Mandrillon, an Amsterdam-based French banker, in his *Spectateur américain* of 1784 described 'the republic of the United States' as an 'immense space where liberty seems to have established its empire, where good manners appear to be respected, where the laws only have the force to preserve to man the rights which he holds by nature'. Mandrillon considered the laws of American states a product of 'this enlightened age', in contrast to the laws on the European continent that still seemed to stem from 'ancient and barbaric times'.⁴² The French republican publicist Gabriel Bonnot de Mably,

40 Edelstein, 'Early-Modern Rights Regimes'. This is not to say there were no philosophical and theoretical differences between the American state declarations and constitutions and these French political thinkers, or between these thinkers.

41 A. Loosjes, *Gedenkzuil: ter gelegenheid der vry-verklaaring van Noord-America* (Amsterdam: Holtrop, 1782), p. 1.

42 M.J.***** [J. Mandrillon], *Spectateur américain ou remarques générales sur l'Amérique septentrionale et sur la République des Treize-Etats-Unis* (Amsterdam: E. van Harrevelt, 1784), xi, p. 255. A second, revised edition of Mandrillon's *Spectateur américain* appeared in 1785.

even though he was rather critical and somewhat pessimistic about the future prospects of the thirteen American republics, felt no hesitation to declare that they had rediscovered the 'dignity of man and went on to draw from the sources of the most wise philosophy the humane principles by which they wish to govern themselves'.⁴³

The urgency these writers felt to express their appreciation of, and commitment to, the American application of principles they until then had only marvelled at by reading philosophical treatises, was in part triggered by the bitter attacks on the American experiment. British antirevolutionary writers, Orangist publicists such as Adriaan Kluit and Laurens Pieter van der Spiegel, and French monarchical defenders of the status quo, such as the royalist journalist Jacques Mallet du Pan, portrayed the American Revolution as a dangerous and, ultimately, hopeless venture.⁴⁴ A considerable stream of French reformers such as Trophime Gérard de Lally-Tollendal, Stanislas Clermont-Tonnerre, Chrétien de Malesherbes and Jean-Joseph Mounier were inclined to look at the English constitution for inspiration. They had a strong case for doing so in the light of Jean Louis De Lolme's powerful argumentative exposition *Constitution de l'Angleterre* and England's success and prosperity.

In their counteroffensive against this influential public opinion, French *américanistes*, and Dutch Patriots were assisted by leading American revolutionary politicians and publicists. Indeed, the shaping of an Atlantic revolutionary frame of mind and the convergence of the principles and ideals of constitutionalism, popular sovereignty, rights declarations, and equal citizenship, was to an important extent the result of the efforts of Benjamin Franklin, Thomas Paine, and Thomas Jefferson to forge an intellectual alliance with those in Europe who were sympathetic to their cause.⁴⁵ Certainly, diplomatic, financial and commercial interests were tremendously important in their endeavours to seek European allies. But the 'kindred spirit tie of congenial principles' that was forged in this process in the minds of Americans, Dutchmen, and Frenchmen was the intellectual foundation of what came to be considered as a larger revolutionary movement. The heart of the matter is that the American example was a promise, a promise of a comprehensive model of what popular sovereignty and citizenship in a constitutional, representative government might look like. The American state declarations and constitutions

43 G.B. de Mably, *Observations sur le gouvernement et les loix des États-Unis* (Amsterdam: Rosart, 1784), p. 2.

44 Schulte Nordholt, *Voorbeeld in de verte*, p. 119; Echeverria, *Mirage in the West*, pp. 128–129. See also F. Soulès, *Histoire des troubles de l'Amérique anglaise* (Paris: Buisson, 1787).

45 W.H. Adams, *The Paris Years of Thomas Jefferson* (New Haven, CT: Yale University Press, 1997); Newman and Onuf (eds.) *Paine and Jefferson in the Age of Revolutions*; Ziesche, *Cosmopolitan Patriots*.

provided a summary of this model. The promise was that a great part of this model, if slightly amended according to national circumstances, could be introduced in France and the Dutch Republic too.

Ironically, by the end of the decade during which the American state declarations and constitutions became such an important example to (future) revolutionaries on the other side of the Atlantic, the Americans adopted a new constitution partly out of discontent with the workings of the state legislatures that were perceived as too democratic.⁴⁶ American Federalists such as Alexander Hamilton desired a constitution to 'contain the amazing violence and turbulence of the democratic spirit'. Governor of Virginia and delegate to the Constitutional Convention Edmund Randolph equally imagined the new constitution to be 'a strong barrier against democracy'. The new American constitution that was debated in 1787–1788 and ratified in June 1788, moreover, neither defined citizenship, nor the duties and rights assigned to citizens, nor the relationship between state citizenship and national citizenship. 'From the perspective of citizenship', as Douglas Bradburn put it, 'the ratification of the U.S. Constitution cannot represent either a culmination or a beginning'.⁴⁷ The transformation of being a subject in a monarchical empire into an American citizen was not a product of the 1788 constitution, but of the revolutionary period and its founding documents: the Declaration of Independence, the revolutionary war, the state declarations and constitutions. By 1789, however, the French were too busy with their own revolution for the American constitution to have a huge impact on French constitutional thought. Dutch Patriots who had always been more familiar with France, and some of whom actually lived there in exile, became equally transfixed by the revolution that took place so much closer to home.

3 The French Revolution and the Heyday of a Transatlantic Ideal of Citizenship

To many Americans, Frenchmen, and Dutchmen the outbreak of the French Revolution provided an unmistakable confirmation of the new wind blowing in the Atlantic world. From an Atlantic perspective, the revolution in one of the most illustrious and powerful kingdoms of Europe suggested that their revolutions could be assembled under one banner and that one could commit

⁴⁶ W. Holton, *Unruly Americans and the Origins of the Constitution* (New York, N.Y.: Hill and Wang, 2007); T. Bouton, *Taming Democracy: 'The People', the Founders, and the Troubled Ending of the American Revolution* (Oxford: Oxford University Press, 2007).

⁴⁷ Bradburn, *The Citizenship Revolution*, p. 17.

to a common cause that transcended national boundaries. But the notion of a common revolutionary project did not appear out of nowhere; it was itself a product, a construction. 'The present era – THE ERA OF FREEDOM – OF UNIVERSAL LIBERTY in this Western world', the *Gazette of the United States* of July 7, 1789, announced, was one of 'liberality, enlightened policy, and superior wisdom'. The 'spirit' of the new era 'broke the chains which held mankind in servitude – and having fixed her temple in our favoured country, she is spreading her salutary reign throughout the world'.⁴⁸ The French translation of *Observations of Government*, an attack by the New-Jersey revolutionary and politician John Stevens on both De Lolme's and John Adams's defences of the English system of mixed government buttressed this vision. Edited and expanded with an additional 200 pages with notes by Condorcet and the *économiste* Pierre Samuel du Pont de Nemours it appeared on the eve of the convocation of the Estates General in early 1789. The editors pictured the supporters of this common cause as constituting an imaginative 'republic'.⁴⁹

There is in the universe a great republic in which all studious and honourable men have the right of citizenship (*droit de cité*). Their vigorous army is recruited from all countries. She is the natural ally to all other republics and all empires in which people are devoted to the common good. She is the natural enemy of all those arbitrary and oppressive governments. She has this remarkable feature that her members, by attaching themselves to her, become still better citizens of their own fatherland.⁵⁰

This passage shows that revolutionaries such as Condorcet and Dupont de Nemours put forth citizenship ideals operating on two levels. They evoked an imaginative Atlantic 'republic' of revolutionaries surrounded by enemies. But they by no means had in mind a model of universal citizenship for a 'real' world republic. They all stressed that citizens were tied to the nation (or fatherland), whether French, American, Dutch, or otherwise. Their point was that by joining the imagined 'republic' of Atlantic revolutionaries, one could become a

48 *Gazette of the United States* (Philadelphia, Pennsylvania), July 7, 1789.

49 John Stevens was born in a prominent New Jersey family. Madison sent his pamphlet to Philip Mazzei who passed it on to the circle of Condorcet and Du Pont de Nemours. According to Joyce Appleby, Jefferson played a role in publishing the heavily annotated French translation. J. Appleby, 'The Jefferson-Adams Rupture and the First French Translation of John Adams' "Defence"', *American Historical Review* 73 (1968), pp. 1084–1091.

50 J. Stevens, *Examen du gouvernement d'Angleterre, comparé aux constitutions des États-Unis de l'Amérique, par un cultivateur de New-Jersey* (Paris: Froullé, 1789), vii.

better *national* citizen in one's own polity (whether it was a republic or a constitutional monarchy). They believed in a model of citizenship based on the *national instantiation* of similar, Atlantic-wide shared principles.

The most prominent and well-known citizen of this imaginative Atlantic 'republic' – and the one who did most to nurture and propagate it – was Thomas Paine. This Anglo-American political thinker and publicist born in Thetford, Norfolk, became the embodiment of the convergence of citizenship ideals in the Atlantic world.⁵¹ By some American newspapers he was referred to as the 'trans-Atlantic patriot'.⁵² His ground-breaking pamphlet *Common Sense* (1776) was by far the most read pamphlet of the entire American Revolution.⁵³ In it he already anticipated his later universalistic rhetoric, claiming that 'The cause of American is in great measure the cause of all mankind'.⁵⁴ His *Rights of Man* (Part one), which came out in London in February 1791, was immediately translated into French. It was soon published in Paris and Baltimore. The second part, often bound together with the first, followed twelve months later. Paine dedicated his *Rights of Man* to the President of the United States, George Washington, 'That the Rights of Man may become as universal as your benevolence can wish, and that you may enjoy the happiness of seeing the

51 Paine has been paid significant attention lately by historians and political scientists alike. See among others, Cotlar, *Tom Paine's America*; J. Fruchtman Jr., *The Political Philosophy of Thomas Paine* (Baltimore, MD: Johns Hopkins University Press, 2009); R. Lamb, *Thomas Paine and the Idea of Human Rights* (Cambridge: Cambridge University Press, 2015); E. Maurice, *Thomas Paine. Le combattant des deux révolutions, américaine et française* (Paris: L'Harmattan, 2004); C. Nelson, *Thomas Paine: Enlightenment, Revolution, and the Birth of Modern Nations* (New York: Viking, 2006); M. Philp, *Reforming Ideas in Britain: Politics and Language in the Shadow of the French Revolution, 1789–1815* (Cambridge: Cambridge University Press, 2014); S. Rosenfeld, *Common Sense. A Political History* (Cambridge, MA: Harvard University Press, 2014); B. Vincent, *The Transatlantic Republic. Thomas Paine and the Age of Revolutions* (Amsterdam: Rodopi, 2005).

52 *Columbian Centinel* (Boston, Massachusetts), June 8, 1791.

53 According to Philip S. Foner, more than 500,000 copies were sold, and parts of it appeared in numerous newspapers. Foner, 'Introduction', in idem (ed.), P.S. Foner (ed.), *The Life and Major Writings of Thomas Paine* (New York, N.Y.: Citadel Press, 1993 [1948]). Born in Thetford, Norfolk, in 1737, Thomas Paine spent the first half of his life in England. In late November 1774, on the eve of the American Revolution, he set foot in Philadelphia where he became a journalist and soon started to write essays for the *Pennsylvania Magazine* which attracted the attention of political radicals and members of the Second Continental Congress. At the request of Benjamin Rush, he started to write a pamphlet in late 1775 legitimizing the separation of the colonies from the British Empire which resulted in the most famous call for independence of the American Revolution.

54 T. Paine, *Common Sense*, in: *Collected Writings*, ed. E. Foner, (New York: Classic House, 2009), p. 5.

New World regenerate the Old'.⁵⁵ Deliberately situated in a transatlantic context, *Rights of Man* became the most successful and debated pamphlet of the early 1790s. The Dutch translation went through three editions between 1791 and 1793; it became essential reading within radicalized reading societies. In 1794, *Common Sense* also appeared in a Dutch translation, as well as most of his other writings of the 1790s.⁵⁶ Paine was praised by Batavian revolutionary journals, and often approvingly referred to by Dutch politicians on the very floor of the Batavian National Assembly.⁵⁷

In France, Paine was even a greater celebrity. According to Bernard Vincent, some 15,000 copies of *Droits de l'homme* were sold in the first three months after its publication.⁵⁸ Paine had been a frequent visitor to Paris before the outbreak of the revolution and lived in France for most of the 1790s. In Paris, he was close with Jefferson and moved in the same circles.⁵⁹ In the aftermath of the King's calamitous flight to Varennes in 1791, Paine, in association with

- 55 T. Paine, *Rights of Man*, in: Foner (ed.), *The Life and Major Writings of Thomas Paine*, p. 244. Alfred Young has counted 26 printings of *Rights of Man* in seven different American cities (of Part 1), 9 of Part 2 in six cities, as well as several combined printings. Numerous newspapers printed extracts of *Rights of Man*. Young makes an educated guess of a total sale of between 50,000 and 100,000 copies. A. Young, 'Common Sense and the *Rights of Man* in America. The Celebration and Damnation of Thomas Paine', in: K. Gavroglu, J. Stachel, M.W. Wartofsky (eds.) *Science, Mind, and Art* (Dordrecht: Kluwer Academic Publishers, 1995), pp. 411–439.
- 56 The three editions of *Rechten van den mensch, of De aanval van den heer Burke op de Fransche omwenteling / beantwoord door Thomas Paine* were published by two publishers in Amsterdam and Rotterdam (Meyer and Brongers). Paine's other translated writings include: T. Paine, *Het gezond verstand* (Dordrecht, n.p., 1794); *Brief aan 't Fransche volk* (Amsterdam: Brongers, 1792); *Burgerpligt-leerende redevoering aan het volk | door Thomas Payne, en deszelfs gevoelen ... betreffende de gerechtelyke beoordeeling van Lodewyk den zes-tienden: met eene voorrede van den uitgever over de vryheid en gelykheid, en het recht van vry spreken en schryven, byzonder der Nederlanderen* (Amsterdam: Brongers, 1794); *De eeuw der rede. Zijnde eene nasporing van ware en fabelachtige godgeleerdheid* (The Hague: Leeuwestyn, 1798).
- 57 *De leerzame praat-al 2*, no. 49 (December 7, 1791), pp. 385–392; *Dagverhaal der handelingen van de Nationaale Vergadering representeerende het Volk van Nederland; van de tweede Nationale Vergadering; van de Nationaale en Constitueerende Vergadering representeerende het Bataafsche volk*, 9 vols. (The Hague: Van Schelle, 1796–1798), vol. 3, no. 264, November 28, 1796 (session November 21), p. 753 [Hereafter: *Dagverhaal*]; *De democraten*, 3 vols. (1796–1798), in numbers 11, 34, 48, 60, 87; *De republieken*, vol. 2, no. 77, (1796), p. 199.
- 58 B. Vincent, *The Transatlantic Republic. Thomas Paine and the Age of Revolutions* (Amsterdam: Rodopi, 2005), p. 13.
- 59 M. Philp, 'Paine, *Rights of Man*', in: P. Clemit (ed.) *The Cambridge Companion to British Literature of the French Revolution in the 1790s* (Cambridge: Cambridge University Press, 2011), pp. 31–46; M. Philp, 'Revolutionaries in Paris. Paine, Jefferson, and Democracy', in: Newman and Onuf (eds.) *Paine and Jefferson in the Age of Revolutions*, pp. 137–160.

Condorcet, Brissot, and others, formed the first republican society, explicitly advocating a republican regime of government without a monarch.⁶⁰ He was accorded French citizenship (together with 17 other foreigners) after the fall of the monarchy in August 1792 and elected to the National Convention as a representative of Calais (three other departments had also nominated him). He soon joined the 'Committee of Nine' chaired by Condorcet in order to draft a new constitution for the Year I.

In his address to the French people upon accepting his nomination as national representative, printed in several American newspapers and translated into Dutch, Paine proclaimed 'the establishment of a new era, that shall blot despotism from the earth, and fix, on the lasting principles of peace and citizenship, the great Republic of Man'. Recalling his own role in the American Revolution, Paine told the French people that

The principles on which that Revolution began, have extended themselves to Europe; and an over-ruling Providence is regenerating the old world by the principles of the new. The distance of America from all the other parts of the globe, did not admit of her carrying those principles beyond her own situation. It is to the peculiar honor of France, that she now raises the standard of liberty for all nations; and in fighting her own battles, contends for the rights of all mankind.⁶¹

What made Paine's rhetoric so attractive, both to the French, Americans, and the Dutch, was that he used the same heading 'republic' to classify the American and French polities – that is to say, a 'true and free' republic. Neglecting many traditional ideas about the nature of a republic, he bluntly defined it as 'government by election and representation'.⁶² On several occasions he asserted that the Dutch, for instance, did not constitute a genuine republic in this sense. His point was that they could, indeed, become one. Such a true republic in which the people are sovereign, and their natural rights protected, requires a constitution. Several years later, Paine's definition of a constitution would be quoted approvingly in the Dutch National Assembly by the Republican representative Hendrik Midderich. On November 21, 1796, he referred to Paine as

60 Condorcet and Paine were close associates. Paine could often be found in the mansion of Nicolas and Sophie de Condorcet. Paine's 'Address to the people of France' was translated by Condorcet. Together they edited and contributed to the journal *Le républicain*.

61 *The Mail; or, Claypoole's Daily Advertiser* (Philadelphia, Pennsylvania), December 29, 1792.

62 T. Paine, 'To the People of France', in: idem, *The Political Writings of Thomas Paine*, 2 vols. (Charleston, S.C.: Davidson, 1824), vol. 2, p. 390.

'one of the most honest and clever of Republicans, one of the most enlightened political philosophers':⁶³

A constitution is a thing *antecedent* to government, and a government is only the creature of a constitution. The constitution of a country is not the act of its government, but of the people constituting a government.

It is the body of elements, to which you can refer and quote article by article; and which contains the principles upon which the government shall be established, the manner in which it shall be organized, the powers it shall have, the mode of elections, the duration of parliaments, or by what other name such bodies may be called; the powers which the executive part of the government shall have; and, in fine, every thing that relates to the complete organization of a civil government, and the principles upon which it shall act, and by which it shall be bound.⁶⁴

This transatlantic rhetoric, in which constitution, rights, equal citizenship, and popular sovereignty were key concepts, presented the American and French revolutions as mutually invigorating each other. While the American Revolution had been an example to France, Paine explained that France was now carrying on the torch as demonstrated by the French Declarations of the Rights of Man and Citizen: 'the whole of the Declaration of Rights is of more value to the world, and will do more good, than all the laws and statutes that have yet been promulgated'.⁶⁵ Together they had fundamentally changed the entire concept of revolution:

What were formerly called revolutions, were little more than a change of persons or an alteration of circumstances. [...] But what we now see in the world, from the revolutions of America and France, is a renovation of the natural order of things, a system of principles as universal as truth and the existence of man, and combining moral with political happiness and national prosperity.⁶⁶

Paine, thus, firmly wedded the American and French revolutions within a single framework, while opening the club to other nations. At its core, the suggestion went, these revolutions shared a single set of principles underlying a revolutionary conception of citizenship that could be transplanted to the

63 *Dagverhaal* 3, no. 264, November 28, 1796 (session November 21), p. 753.

64 Paine, *Rights of Man*, p. 278. Cf. Anonymous [T. Paine], 'Four Letters on Interesting Subjects' (1776), in: Rakove, *Declaring Rights*, pp. 71–73.

65 Paine, *Rights of Man*, p. 316.

66 Paine, *Rights of Man*, pp. 341–342.

rest of Europe. It was 'an age of revolutions, in which every thing may be looked for'.⁶⁷

Former Dutch Patriots as well as those who had come of age in the early 1790s eagerly embraced Paine's message. To the lawyer and publicist Pieter Paulus (1753–1796), one of the 'founding fathers' of the Batavian Revolution, both the American and French Revolution served as sources of inspiration. As one of the leading Batavian revolutionaries, Paulus chaired the revolutionary Holland Assembly of Provisional Representatives in 1795 and delivered the opening speech of the *Nationale Vergadering* (National Assembly) as its first chairman on March 1, 1796. His chairmanship lasted only 16 days, however, as he fell ill and died at the age of 42.⁶⁸ Back in 1787, he had visited Paris on a secret mission to discuss the Patriot cause with French officials and ministers, and possibly even convince them to support Patriots in their attempt to overthrow the stadholder. In Paris, he met Lafayette and Jefferson, frequented many dinners and salons, and was able to set up meetings with high French diplomats, one of whom called Paulus 'a very enlightened patriot'.⁶⁹ Although his efforts were in vain, as the French at that time had more important domestic issue to attend to, between 1792 and 1796 Paulus together with his fellow Dutch revolutionaries could be seen as carrying on the torch of Atlantic revolutions.

Paulus's 1793 *Verhandeling over de vrage: in welken zin kunnen de menschen gezegd worden gelyk te zyn? En welke zyn de regten en pligten die daaruit voortvloeien?* (Treatise on the Question: In which Sense Can People be Said to be Equal? And which are the Rights and Duties that can be Said to Result from it?, hereafter: *Treatise on Equality*) was the single most important work of Batavian political thought. In it he argued on the assumption of the 'moral' equality of men in their natural condition (with reference to Locke's *Second Treatise*) for a '*burgermaatschappij*' (citizen society) in which the natural rights of man must be maintained and protected.⁷⁰ Critical of what he took to be Rousseau's

67 Paine, *Rights of Man*, 344.

68 Surprisingly, there is no good biography of Paulus. In fact, the secondary literature is scarce, but see E. Van der Wal, 'Geen natie van atheïsten. Pieter Paulus (1753–1796) over godsdienst en mensenrechten', *Jaarboek van de Maatschappij der Nederlandse Letterkunde te Leiden*, 1995–1996 (Leiden: Brill, 1997), pp. 45–62.

69 A. Baggerman and R. Dekker, *Kind van de toekomst. De wondere wereld van Otto van Eck (1780–1798)* (Amsterdam: Wereldbibliotheek, 2005), pp. 30–31.

70 Paulus's treatise was his response to the prize essay contest on the question 'in which sense can people be said to be equal and which are the rights and duties that can be said to result from this equality?', proposed in 1791 by the *Teylers Godgeleerd Genootschap* (Teyler's Theological Society), one of the more prominent Dutch learned societies at the time. Paulus finished his treatise too late and was not intended to compete for the price which had already been won by the professor of natural law and law of nations at the Amsterdam

mistaken view of the a-moral natural condition of solitary 'savages', he rejected an abrupt break between a state of nature in which man enjoys his natural rights, and a civil society in which merely 'positive' civil rights are protected. The *burgermaatschappij* in which people enter by voluntary consent, thus, ought to maintain the original moral equality and natural rights of men. By praising both Paine's *Rights of Man* and the French Declaration of the Rights of Man and Citizen, Paulus situated his *Treatise on Equality* in the context of Atlantic revolutions. Apart from drawing on Locke, Montesquieu, Price, Cicero, Burlamaqui, and others, Paulus also used a full 20 pages to argue that his conception of equality was entirely coherent with the teachings of Christianity, in particular with the lessons exemplified by Jesus's life as told in the four canonical gospels.

If one of the key political treatises of the Batavian Revolution consequently had its own Christian flavour, it was fully consistent with the broad model of a representative republic based on the principles of popular sovereignty, constitutionalism, equality before the law, and the unalienable rights of man. Its model of citizenship closely resembled that of political thinkers such as Paine or Condorcet. The *Treatise on Equality* was reprinted four times in a short period of time, translated into French, and was mentioned in French and American newspapers.⁷¹ The Holland Declaration of Rights of Man and Citizen of 1795, drafted principally by Paulus and the Leiden lawyer Jacob George Hieronimus Hahn took some phrases almost verbatim from Paulus's list of rights as enumerated in his *Treatise on Equality*. In turn, the Holland Declaration would serve as a direct inspiration for the 1798 Batavian Declaration of the Rights of Man and Citizen for the one and indivisible Batavian Republic.

Many Batavian revolutionaries, thus, saw themselves as taking part in a larger revolution. As the journal *De republikein* pointed out in 1796, after having outlined a constitutional representative republic based on the rights of man:

Athenaeum Illustre, Henrik Constany Cras's *Verhandeling over de gelykheid der menschen, en de regten en pligten, welken uit die gelykheid voortvloeijen* (Treatise on the Equality of Men and the Rights and Duties that Result from this Equality) (Haarlem: Enschédé & van Walré, 1793). Paulus was familiar with Cras's essay, which was in the end completely overshadowed by Paulus's treatise.

71 An article reprinted and translated from the French *Moniteur Universel* stated: 'Paulinus, author of several valuable works upon the Rights of the People, who was bold enough to publish even in Holland, under his name two years ago, a Treatise on the Rights of Man, has just been elected grand pensioner of the regenerated states of Holland'. It also mentioned his visit in France in 1787–1788. This article appeared in: *Gazette of the United States*, April 3, 1795 (Philadelphia, Pennsylvania); *Greenleaf's New York Journal and Patriotic Register* (New York, New York), April 8, 1795, and *Phoenix*, May 2, 1795 (Dover, New Hampshire).

'all our remarks are no other than those of MONTESQUIEU, ROUSSEAU, FRANKLIN, RAYNAL, PAINE, SIEYES, MOUNIER, CONDORCET, etc., names every friend of the people has only pronounced with esteem'.⁷² Apparently, the Dutch author saw no fundamental tensions between these authors, and he did not expect his readers to think otherwise. It was of course hardly an original strategy to back up one's position by claiming that it was supported by an international list of great revolutionaries and thinkers. Yet, this remark exemplifies the assumption that both sides of the Atlantic were somehow united in a common revolutionary project.

As this chapter has demonstrated, Konijnenburg's journal was no exception. In a speech in the Jacobin Club delivered in July 1791, the French revolutionary Brissot claimed that 'The American Revolution gave birth to the French Revolution'.⁷³ Exemplary of the outbursts of transatlantic enthusiasm in the United States were the toasts drunk at the New York Tammany Society in late December 1792. During the early years of the existence of this Society (that had been founded three years earlier) both Federalists and Republicans could still gather 'in the indissoluble bonds of Patriotic Friendship'. As a number of newspapers reported, in one of its celebratory meetings the society toasted on the 'The Republic of France', 'The Citizen of the world, Thomas Paine', 'Universal Freedom', and 'May the union and examples of France and America enlighten and bless mankind'. The newspaper reporter present at the meeting delighted in the fact that 'mankind begin[s] to feel a universal fellowship and brotherhood', and that the 'shores of Europe and America illuminate each other'.⁷⁴ Certainly, the editor of *De republikein*, Brissot, and the members of the

72 *De republikein*, vol. 2, no. 77, (1796) p. 199.

73 J.-P. Brissot, 'Discours sur la question de savoir si le roi peut être jugé prononcé à l'assemblée des amis de la constitution dans la séance du 10 juillet 1791', in: F.V.A. Aulard, *La Société des Jacobins; recueil de documents*, 6 vols. (Paris: Jouaust, 1887–1897), vol. 2, p. 622.

74 'St. Tammany Society Constitution', in: E.P. Kilroe, *Saint Tammany and the Origin of the Society of Tammany, or Columbian Order in the City of New York* (New York, N.Y.: M.B. Brown, 1913), p. 128; *The Daily Advertiser* (New York, New York), December 29, 1792; *New-Jersey Journal* (Elizabethtown, New Jersey) December 29, 1792; *Argus* (Boston, Massachusetts), January 8, 1793. The reports in American newspapers of toasts celebrating France could be multiplied endlessly. On the printing of toasts as 'form of political communication', see J.L. Pasley, '1800 as a Revolution in Political Culture. Newspapers, Celebrations, Voting, and Democratization in the Early Republic', in: P.S. Onuf, J.E. Lewis, and J. Horn (eds.) *The Revolution of 1800: Democracy, Race, and the New Republic* (Charlottesville, VA: University Press of Virginia Press, 2002), pp. 121–152, esp. pp. 133–134. On the Tammany Society celebrating the French Revolution, see A.F. Young, *The Democratic Republicans of New York: The Origins, 1763–1797* (Chapel Hill, N.C.: University of North Carolina Press, 1967), pp. 202–203, 208, 350.

Tammany Society had their own reasons to invoke this common bond. But it was unmistakably a moment of converging ideals, principles, and a 'kindred spirit tie'.

4 Regimes of Exclusion

The upbeat, even militant transatlantic citizenship discourse, however, should not conceal the limits and concrete definitions of citizenship prevalent in the Atlantic world. Despite the universalistic tone of the revolutionary citizenship discourse in 1789 and the early 1790s, in practice various social groups were excluded from citizenship, both in the American states, the later United States, France and the Dutch Republic. The converging citizenship ideals that were articulated in a universalistic language were themselves governed by various regimes of exclusion that were both evolving and politically divisive.

Historians of the age of Atlantic revolutions have thoroughly explored and debated the strategies and ideologies underpinning the exclusion – as well as (gradual) inclusion – of religious minorities, Jews, women, free men of colour, enslaved Africans, Native Indians, domestic servants, and the rural and urban poor. Various arguments, often (but as we will see, not always) specific to the group in question, were employed in order to reserve citizenship for a broadly defined group, i.e. the white, independent male, even though precise definitions differed and fluctuated. Jews, for example, were sometimes portrayed as a distinct 'people' within the state, Catholics as loyal to a 'foreign' authority, Native Indians as belonging to 'alien tribes' of an inferior civilization, and women as dependent and incapable of making informed judgments based on reason (the cases of free people of colour, and free and enslaved black people will be discussed extensively in Chapters 2–4).⁷⁵

75 The literature is extensive, but see Olivier Le Cour Grandmaison, *Les citoyennetés en Révolution: 1789–1794* (Paris: Presses Universitaires de France 1992); Rutjes, *Door gelijkheid gegrepen*, pp. 121–160; Rogers M. Smith, *Civic Ideals: Conflicting Visions of Citizenship in U.S. History* (New Haven, CT: Yale University Press, 1997); Carroll Smith-Rosenberg, *This Violent Empire: The Birth of an American National Identity* (Chapel Hill, N.C.: University of North Carolina Press, 2010). More specifically on Jewish emancipation in the age of revolutions, see Rena Fuks-Mansveld, 'Verlichting en emancipatie omstreeks 1750–1813', in: Hans Blom (ed.) *Geschiedenis van de Joden in Nederland* (Amsterdam, 1995), pp. 177–203; Ronald Schechter, *Obstinate Hebrews. Representations of Jews in France, 1715–1815* (Berkeley, CA: University of California Press, 2003), pp. 150–193. On women, their role in revolutionary political culture, and their exclusion from full citizenship, the literature is vast. Some of the more important works are: Susan Branson, *These Fiery Frenchified Dames: Women and Political Culture in Early National Philadelphia* (Philadelphia, PA: University of Pennsylvania Press, 2001); Jennifer Heuer, *The Family and the Nation: Gender and Citizenship*

Yet the conferral of citizenship was not a zero-sum game. Several groups were admitted to the community of citizens broadly conceived. As members of the civic body they were granted a number of rights. Within the citizen body only a minority – usually white property-owning males – was entitled to a more elaborate set of rights, including the right of political participation, voting, and office. The crux of the matter for those groups whose claim to (full-fledged political) citizenship was contested, was that although their *natural* rights were generally recognized, full-fledged political citizenship required something else.⁷⁶ As the French constitutional-monarchist and national representative the Duke of Larochevoucauld summarized in September 1791: '[P]olitical capacity is not a natural right, but a right granted by society for its greater benefit'.⁷⁷ The phrase 'rights of man *and* citizen' as the French and Dutch declarations had it, was in that sense inherently unstable and potentially paradoxical. All citizens were entitled to the rights of man, but not all men (let alone women) were entitled to the rights of citizenship. The universalistic and egalitarian language of the rights of man was never intended for all members of the polity. Within the historical tradition of republican political thought at large, moreover, there was nothing unusual about distinguishing between man and citizen. Only independent males who owned a certain amount of property could claim full civil and political rights as citizens of the republic. True, in the second half of the eighteenth century the concept of republican citizenship evolved and merged with a popularized egalitarian language of natural rights. But throughout the Age of Revolutions and into the 1790s, distinctions were made between claiming rights as human being, claiming (some) rights as member of the civic body, and claiming the full package of rights as *political* citizen.⁷⁸

in Revolutionary France, 1789–1830 (Ithaca, N.Y.: Cornell University Press, 2005); Evelien Koolhaas-Grosveld, 'Over vrouwen in de Bataafs-Franse Tijd', in: Grijzenhout, Van Sas and Velema (eds.) *Het Bataafse experiment*, pp. 185–213; Joan W. Scott, *Only Paradoxes to offer: French Feminists and the Rights of Man* (Cambridge, MA: Harvard University Press, 1996). On native Americans, see Frederick E. Hoxie, Ronald Hoffman, and Peter Albert (eds.) *Native Americans and the Early Republic* (Charlottesville, VA: University of Virginia Press, 1999); Colin Calloway, *White People, Indians, and Highlanders. Tribal Peoples and Colonial Encounters in Scotland and America* (Oxford: Oxford University Press, 2008); James Kettner, *The Development of American Citizenship*, pp. 287–333; Daniel R. Mandell, *Tribe, Race, History. Native Americans in Southern New England, 1780–1880* (Baltimore, MD: Johns Hopkins University Press, 2010); Anthony F.C. Wallace, *Jefferson and the Indians: The Tragic Fate of the First Americans* (Cambridge, MA: Harvard University Press, 1999).

76 The cases of free people of colour, and free and enslaved black people will be extensively discussed in Chapters 2–4.

77 AP 31 (24 September 1791), pp. 282–283.

78 I'd like to thank Nathan Perl-Rosenthal for discussing this point with me.

The limits of the natural rights one is entitled to (just by virtue of being human) was articulated by Condorcet, one of the most important natural rights theorists of the French Revolution, as well as a prominent antislavery spokesman and defender of women's rights. In various writings, including his famous *Sketch for a Historical Picture of the Progress of the Human Mind*, he made the unqualified statement that 'all men by their very nature possess equal rights'.⁷⁹ However, despite his insistence on rights as man's natural attributes, the starting point for Condorcet's broader analysis of society was an 'enlightened citizenry'. 'In every civilized nation', Condorcet wrote in a series of anonymous letters in 1788, 'there can be no enjoyment of natural rights without enlightenment'.⁸⁰ In his view, shared by many at time, there was an intimate link between the level of people's 'enlightenedness' and their entitlement to claim their rights *as citizen*.

There was also a political-economical dimension to it. The famous citizenship law adopted by the French National Constituent Assembly on 22 December 1789, made a distinction between the 'passive' citizen as rights-holder and the 'active' citizen as politically-active agent. This distinction was first suggested by the abbé Sieyès who argued that 'only those who pay taxes are real stakeholders in the great social enterprise. They alone are true active citizens'.⁸¹ The National Assembly adopted Sieyès's suggestion. It determined that to qualify for full active citizenship someone was required (1) to be a native or naturalized Frenchman; (2) to be over twenty-five years of age; (3) to pay a tax requirement equivalent to the local value of three days of labour; (4) to have resided in their own canton for at least a year; and (5) not to be deployed in domestic service. As Olivier Le Cour Grandmaison and others have argued, the formal tax requirement was grounded in the idea that eligibility for full active citizenship is dependent on possessing certain intellectual and moral qualities. These qualities in turn were dependent on financial independence and education. Only thus the citizen's public interestedness, autonomy, and sound judgement could be guaranteed.⁸²

79 Condorcet, *Esquisse d'un tableau historique des progrès de l'esprit humain*, in: *Œuvres complètes de Condorcet*, ed. A. Condorcet O'Connor and F. Arago, 12 vols. (Paris, 1847–49; repr. Stuttgart, 1968), vol. 6, p. 178.

80 As cited in: David Williams, *Condorcet and Modernity* (Cambridge: Cambridge University Press, 2004), p. 46, 51. The letters were published as *Lettres d'un citoyen des États-Unis à un Français sur les affaires présentes* (Philadelphia, PA, n.p., 1788).

81 *Préliminaire de la Constitution françoise: reconnaissance et exposition raisonnée des droits de l'homme & du citoyen* (Versailles: Pierres, 1789), pp. 13–14.

82 Le Cour Grandmaison, *Les citoyennetés en Révolution*. Cf. Patrice Gueniffey, 'Suffrage', in: Furet and Ozouf (eds.), *A Critical Dictionary of the French Revolution*, pp. 571–581. The distinction was made famous, first, by the revolutionary thinker Emmanuel Joseph Sieyès.

In practice, it meant that all women and around two-fifths of all adult French men were excluded from active citizenship. But in the early years of the French Revolution active citizenship too came in gradations: those active citizens eligible to vote (they were required to pay a tax minimum of three days' labour); those eligible to take municipal office or to be a member of the electoral colleges (a tax minimum of ten days' labour); and those eligible to serve as a national deputy (a tax minimum of one silver mark). 'Regular' active citizens, in other words, were only allowed to vote in primary assemblies for electors (the members of electoral assemblies); only electors voted directly for national deputies. As recent estimations point out, this meant that around sixty percent of all active citizens were eligible to take up municipal offices or become electors.⁸³

The first French constitution promulgated on 14 September 1791 reiterated the distinction between active and passive citizens, raised the bar for electors (who elected national deputies), but revoked the silver mark as requirement for becoming a national representative.⁸⁴ During the first year of the revolution the restrictions on active citizenship was, apart from a few isolated protests, not seriously challenged. But the silver mark requirement for national representatives caused public outcry from the start. From the left, journalists such as Camille Desmoulins and politicians such as Condorcet and Grégoire, but above all Maximilien Robespierre, were keen to point out the incongruence between the universalistic promise of the Declaration of the Rights of Man and Citizen and the restrictions placed on active citizenship, membership of the electoral assemblies, and the National Assembly.⁸⁵

The qualifications and restrictions of the French citizenship model of 1789–1791, however, did not prevent the Atlantic convergence of revolutionary citizenship ideals. In the early American Republic, the first stages of the

On this, see William H. Sewall, *A Rhetoric of Bourgeois Revolution: The Abbé Sieyès and 'What Is the Third Estate?'* (Durham, N.C., 1994), pp. 145–184.

83 Melvin Edelstein, *The French Revolution and the Birth of Electoral Democracy* (Farnham: Ashgate, 2014), pp. 67–68.

84 Varying according to the population of the city (or type of district) in question, only owners of property equivalent to a rental value of between 150- and 200-days' local wages (or tenants working a piece of land worth 400 days' wages in rent), were eligible to become elector and directly elect national deputies. Malcolm Crook, *Elections in the French Revolution: An Apprenticeship in Democracy, 1789–1799* (Cambridge: Cambridge University Press, 1996), pp. 46–47. Patrice Gueniffey, *Le Nombre et la raison. La Révolution française et les élections* (Paris: Éditions de l'E.H.E.S.S., 1993).

85 Crook, *Elections in the French Revolution*, pp. 33–34; Edelstein, *The French Revolution and the Birth of Electoral Democracy*, pp. 47–48.

French Revolution met with nearly universal approval across the entire political spectrum.⁸⁶ The outbreak of the French Revolution and the Declaration of the Rights of Man and Citizen heralded the heyday of what many considered a new model of citizenship based on popular sovereignty, the rights of man, constitutional safeguards, and civil liberties, a model that seemed to have taken root on both sides of the Atlantic. As the following chapters point out, this transatlantic mind set would be severely tested in the years to come.

86 L.S. Kramer, 'The French Revolution and the Creation of American Political Culture', in: Klaitz and Haltzel (eds.) *The Global Ramifications of the French Revolution*, pp. 26–54; Wood, *Empire of Liberty*, pp. 174–175; S.M. Elkins and E.L. McKittrick, *The Age of Federalism* (New York, N.Y.: Oxford University Press, 1993), pp. 309–310.