

# MICHIGAN LAW REVIEW

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## COMMENTS

ALIENS—NATURALIZATION—THE PROMISE TO BEAR ARMS—In two recent cases, the Supreme Court has held that citizenship must be denied an applicant who is unwilling to promise unreservedly to bear arms in defense of the United States.<sup>1</sup> One applicant, Douglas Clyde Macintosh, a Professor of Divinity in Yale University, who served for four years in France during the World War, stated that due to religious convictions he was unable to promise beforehand to fight unless, in his own opinion, the war was morally justifiable and in the best interests of humanity. The other, Marie Averil Bland, a minister's daughter who served as a nurse in the war, stated that her religious beliefs forbade her personally bearing arms, and refused to take the oath of allegiance as interpreted without the qualifying words, "as far as my conscience as a Christian will allow." Both

<sup>1</sup> United States v. Macintosh, 283 U. S. 605, 75 L. ed. 769 (1931); United States v. Bland, 283 U. S. 636, 75 L. ed. 781 (1931). See Charles E. Carpenter, "The Promise to Bear Arms as a Prerequisite to Naturalized Citizenship," 10 OR. L. REV. 375 (1931).