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Squadrito, Kathy

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# Locke and the Dispossession of the American Indian

KATHY SQUADRITO

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In the *Second Treatise* Locke remarks that "in the beginning all the world was America," viz., "uncivilized."<sup>1</sup> Roy Harvey Pearce contends that during centuries of native dispossession, "virtually all Americans were, in the most general sense, Lockean," primarily in their attitudes toward land and private property.<sup>2</sup> James Tully argues that Euro-Americans are at present Lockean in the sense that Locke provides "a set of concepts we standardly use to represent and reflect on contemporary politics."<sup>3</sup> Tully, Michael K. Green, and an increasing number of historians accord Locke's *Second Treatise* a prominent role in American Indian dispossession.<sup>4</sup> Richard Drinnon, Francis Jennings, Russell Thornton, and David E. Stannard do not assign the *Second Treatise* as influential a role as Tully, but place it in a context, unlike Tully, of historical genocide, an American Holocaust.<sup>5</sup>

In this paper I address two different interpretations of Locke's social and political work: first, the generous interpretation that Locke did not have disparaging things to say with regard to American Indians and that his works do not exhibit ethnocentric arguments; second, the interpretation popularized by James Tully that Locke's agricultural argument was developed with the intention of taking American Indian land without consent, that Locke's work is in large part responsible for the dispossession of the American Indian. I argue that a generous reading of Locke does

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Kathy Squadrito is an associate professor of philosophy at Purdue University, Fort Wayne, Indiana.

not adequately portray his attitude toward American Indians. At the same time, however, interpretations placing Locke's political arguments as central to the history of dispossession are not entirely warranted. Most commentators focus exclusively on Locke's *Two Treatises of Government*. I present a more comprehensive analysis and argue that, considering the religious and political aspect of Locke's theory of knowledge, it is the *Essay* that has had a more lasting influence for American Indians.

In part I, I focus on the images of American Indians presented in the *Essay* and *Two Treatises*. I argue that Locke includes many disparaging descriptions of American Indians. The descriptions are important because Locke often dismisses positive images of American Indians in favor of negative images. The latter are used to support his theory of stages of progress, a view central to his theory of knowledge and his political work. In parts II and III, I analyze Locke's view of property rights. Contrary to the views of James Tully, Michael Green, and other commentators, I believe that Locke's view of property cannot be read as a justification for the dispossession of the American Indian. Further, I argue that although Locke's position on just war and American Indian resistance is not unambiguous, he does reject both natural slavery and conquest as means to take property. In part IV, I argue that Locke does not explain how waste land is to be appropriated when occupied by natives who resist, that he rejects genocide and prefers treaties to force and war. Contrary to Tully, I conclude that Locke's argument that land can be taken without consent was not employed by policy makers in England or America and was not very influential in the dispossession of American Indians. In part V, I argue that Locke's *Essay* had more of an impact on American Indian culture than the *Second Treatise* theory of property. Locke's denial of innate ideas and his emphasis on Christianity were used to set educational agendas of forced assimilation and cultural extinction.

## I. DESCRIPTIONS OF AMERICAN INDIANS IN LOCKE'S ESSAY

In general, the European attitude toward native people of America was negative, characterized by the stereotypes of "savage," "ignorant," "lazy," and "wild beasts." Did Locke hold this negative opinion? According to Neal Wood, Locke's "view of natives and tribesmen was not marked by the negative attitude and anti-

primitivism to be found in much contemporary and later literature on the subject."<sup>6</sup> James Farr contends that Locke did not hold an "empirical theory of racial inferiority," that "even 'savages' are born free and equal, with a full complement of natural rights." It is interesting, he says, "that Locke had generous or nondisparaging things to say about other peoples of color, especially American Indians"; further, Locke "was intrigued by their customs and their medical practices . . . convinced of their 'native rustic reason,' and praising of their forms of government."<sup>7</sup> According to Thomas L. Pangle, Locke's view of American Indians is an aspect of his overall political theory, a theory that exhibits a sincere commitment to the natural needs of all humanity.<sup>8</sup>

Locke's knowledge of colonial affairs was extensive. An avid reader of navigation and travel literature, he also served as commissioner of the Board of Trade. As secretary to the associated Proprietors of the Colony of Carolina, he received a portion of his income from colonial investment. Since he was a member of companies created to profit from slavery and overseas possessions, his interest in the New World was more than academic. As Farr points out, "When Locke died in 1704, precious few Englishmen could have boasted of equalling his intimate knowledge of colonial life, foreign peoples, or slavery and the slave trade."<sup>9</sup>

Richard Hakluyt's *The Principle Navigations, Voyages, Traffiques, and Discoveries of the English Nation* provided Locke with some fairly accurate descriptive information with regard to native dress, customs, government, and religion. However, stereotypes of the ignorant, wild, and immoral natives were also prevalent throughout the work. Robert Berkhofer, Jr. argues that the way in which the English moved from "supposedly factual descriptions of Native Americans to the symbolism of the Indian can be traced from Richard Hakluyt to Thomas Hobbes and John Locke."<sup>10</sup> Hakluyt's compendia contain conflicting descriptions of native people, describing them as handsome, good, civil, generous, loving, gentle, faithful, industrious in labor, and quick of apprehension, and, on the other hand, as deceitful, ignorant, and sinful, and as thieves and barbarians who had no government or religion. For example, Hakluyt wrote,

They are of much simplicity and great cowards, void of all valor, and are great witches. They use diverse times to talk with the Devil, to whom they do certain sacrifices.

We found the people most gentle, loving, and faithful, void of all guile and treason, and such as live after the manner of the golden age.

We were entertained with all love and kindness, and with as much bounty . . . as they could possibly devise.

The wild people go naked . . . they have no care for anything but only from day to day for that which they need to eat.

There remain some among the wild people that unto this day eat one another.<sup>11</sup>

Considering the wealth of information at his disposal, which images of native people does Locke employ? It would appear that he uses somewhat conflicting descriptions to suit his ideological needs. In contradistinction to Hobbes's notion of prepolitical society as one of constant war, Locke needs to use the image of a relatively gentle and moral native to support his own political views. This notwithstanding, the more consistent image is of the immoral, sinful native.

Locke frequently uses examples of native people to support his epistemological theories concerning the origin of knowledge. In his polemic against innate ideas, he uses natives to confirm that all ideas originate from experience, viz., sensation and reflection. The ignorance of native people is a constant theme. Locke classifies American Indians in one group along with children, idiots, the illiterate, and other savages.<sup>12</sup> In spite of his knowledge of American Indian cultural diversity (languages, art forms, land use, and government), he chooses to ignore varied achievements and stress that which he assumes to be deficiency. Locke says,

Amongst *children, idiots, savages*, and the grossly illiterate, what general maxims are to be found? What universal principles of knowledge? Their notions are few and narrow, borrowed only from those objects, they have had to do with, and which have made upon their senses the frequentest and strongest impressions. A child knows his nurse, and his cradle, and by degrees the play things of little more advanced age. And a young savage has perhaps, his head filled with love and hunting, according to the fashion of his tribe. But he that from a child untaught, or a wild inhabitant of the woods, will expect these abstract maxims and reputed principles of sciences, will I fear, find himself mistaken. Such kind of

general propositions, are seldom mentioned in the huts of Indians.<sup>13</sup>

Locke goes on to point out that abstract principles of science, including the science of morality, are the language and business of the schools and academies of learned nations.

Locke's point could have been expressed in an entirely different way. Contrasting scientifically literate Europeans with Europeans lacking such knowledge would have been sufficient. Here native tribes are compared to European nations, the former considered unlearned in general. American Indians could also make the same point with regard to innate ideas by stressing supposed deficiencies in European thought and learning, e.g., inability to see spiritual value in land, inability to comprehend the advantages of communal living, lack of generosity, etc. Locke's example perpetuates the stereotype of native people as lacking diversity, as immoral, ignorant, wild, nomadic hunters. Savages, he says, "being of all others the least corrupted by customs, or borrowed opinions; learning, and education, having not cast their Native thoughts into new molds" still do not show innate ideas (1.2.27). The mind of the indigenous person is thus considered one of the closest to his *tabula rasa* as possible. Since abstract ideas are considered that which puts a perfect distinction between man and beast, the reader is led to regard American Indians, who are confined to simple ideas or a few abstract ideas, as akin to animals (2.11.10).

Locke further deprecates indigenous people of the world by considering their religions to be nothing but superstition or atheism. Arguing against the claim that the idea of God is innate, he says that some people may "allow savages, and most country-people, to have ideas of God and worship" but that "conversation with them, will not make one forward to believe . . ." (1.4.19). American Indians, like the children and young people to whom Locke compares them, may employ the name of God, yet says Locke, "the notions they apply this name to, are so odd, low, and pitiful, that no body can imagine, they were taught by a rational man" (1.4.16). He classifies native religions as ideas developed by "the lazy and inconsiderate part of men" who simply receive such notions by chance from common tradition and "vulgar conceptions, without much beating their heads about them." True notions of God are acquired, he says, only by "a right and careful employment" of thought and reason (1.4.15).

Although Locke knows otherwise, he presents the American Indian as a person interested only in the pursuits of pleasure.<sup>14</sup> "Right reason" for Locke leads to the adoption of the true religion, Christianity, and is predicated on education in science, logic, and philosophy. The "rustic reason" that Locke attributes to native people is not, as Farr claims, the use of "right reason." Locke is not praising natives at all. The attribution occurs in the context of Locke's mocking the scholastics' use of syllogisms as a source of practical knowledge and useful discovery. "Rustic reason" is observation and the utilization of raw material observed (e.g., iron), not much different from the type of reason Locke attributes to animals. Locke is not contending that natives are more intelligent than scholastic philosophers (4.17.6)! That Locke was intrigued by native customs is evident throughout his works; that his remarks are nondisparaging is not so obvious.

Locke contends that the difference of degrees in human understanding, apprehension, and reasoning, is so great "that there is a greater distance between some men and other, . . . than between some men and some beasts" (4.20.5). Since Locke speaks of American Indians as hunters, as those who run wild through the woods, as ignorant and lacking in Christian virtue, it is easy for readers to classify all native people as animals or to classify some as below the virtues of some animals. As Pearce points out, that natives lived like beasts was a common theme of voyage narratives. Locke exploits this imagery in the *Essay* as well as in the *Two Treatises*.

Locke does not appear to consider the possibility that American Indians enjoyed living as they did. He speaks of the "Ancient savage Americans" as lacking and wanting the conveniences of life (4.12.11). This point is repeated in both the *Essay* and the *Second Treatise*. Locke's choice of examples obviously reflects the ethnocentric attitude of his time. Since American Indians would hardly consider such remarks generous or nondisparaging, Farr's analysis appears to make sense only because he places Locke in a non-Aristotelian context. Unlike Aristotle, Locke does not consider any human to be innately inferior to other humans. In the *Second Treatise* he asserts that all men are created free and equal, with similar capacities for rational thought and knowledge (4). Differences are explained by environment and education. Locke does not confine derisive language to American Indians; he speaks of criminals, the unemployed, the lazy, and the poor of England in the same way. In fact, it is often difficult to determine which group he is discussing. References to "wild savage beasts,"

for example in chapter 2 of the *Second Treatise*, are often about criminals of the world. However, the view that all men are created equal does nothing to eliminate ethnocentrism and its unfortunate consequences for indigenous people. Historically, forced assimilation has followed the claim of original equality.

### **Descriptions of American Indians in the *Two Treatises of Government***

The images of American Indians found in the *Two Treatises* are consistent with those of the *Essay*. The natives in the wild woods of America are categorized as “needy and wretched,” as “poor in the comforts of life” (37, 41). Locke’s comparisons between Europeans, American Indians, and various ancient people reflect his belief in stages of human development from savagery to civilization: “Thus in the beginning all the world was America, and more so than now; for no such thing as money was any where known” (49). Ronald Meek has traced the essential component of developmental theories to modes of subsistence, the “normal” progression defined as hunting, pasturage, agriculture, and commerce: “To each of these modes of subsistence . . . there corresponded different sets of ideas and institutions relating to law, property, and government, and also different sets of customs, manners, and morals.”<sup>15</sup> Meek considers Locke’s contribution to the development of this theory significant. Locke contends that the difference between a native and “a more improved English-man” lies in the exercise of faculties bound within the customs of their respective countries (1.4.12).

Locke was aware of narratives that attested to the sophistication of native government and agriculture. In his accounts of Virginia (1607–1609), John Smith wrote that the natives participated in “such government as that their magistrates for good commanding, and their people for due obedience and obeying, excel many places that would be accounted very civil.”<sup>16</sup> The first illustrations of Virginia depict natives living in settled villages with agricultural plots. Smith points out that natives lived with the understanding of precise boundaries demarcating the land of each tribe. Early English accounts indicate a wide variety of crops planted on a single field. Neal Salisbury notes, “[A]s the descriptions imply, agriculture had replaced hunting as the principal source of food for Indians in southern New England by the seventeenth century.” These crops included beans, squash, pump-



kins, cucumbers, maize, and tobacco. Locke nonetheless presents the reader with the historically inaccurate generalization of American Indians as hunters roaming over and never cultivating the land. Anthony Wallace surmises that such a disregard for fact "may in part have been caused by a kind of gender bias." For many Europeans, "[w]hat constituted a people's character, their economic system, their political structure, was what *men* did."<sup>17</sup> Since American Indian men were often described as wandering over their tribal hunting grounds, Locke categorizes their culture as prepolitical or uncivilized. He chooses to present the image of American Indians discussed by Joseph Acosta: "... and if Josephes Acosta's word may be taken, he tells us, that in many parts of America there was no government at all."<sup>18</sup>

Locke equates American Indian society with the first stages of life in Asia and Europe; "the Kings of the Indians in America" are merely generals of their armies and have little authority and dominion in times of peace (108). As William G. Batz suggests, given Locke's respect for Acosta's work on the West Indies it may be more than coincidental "that Acosta's history of the Aztec civilization corresponds quite closely with Locke's developmental hypothesis."<sup>19</sup> In his history of Central America, Acosta describes the first inhabitants of the Indies as "barbarous . . . without law, without king, and without any certain place of abode, but go in troupes like savage beasts."<sup>20</sup> Since there are few inhabitants and no such thing as money, people are not inclined to enlarge their possessions, especially in land.

What Locke does not mention is just as significant as what he does. Acosta's praise of American Indians does not fit into the ideological context of "primitive man." In this context it is more important for Locke to pick negative images from Acosta's work. Acosta often vacillates between describing American Indians as a mixture of man and beast and as rational and civil. In his *Natural and Moral History of the Indies* (1590) he praises American Indians for their cultural achievements, considers their intellect sufficient to grasp Christian principles, and attempts to defeat "the false opinion generally held that the Indians are a brutal and bestial people without understanding, or with so little that they scarcely merit the name of men." Acosta goes on to criticize the Aristotelian argument of natural slavery and recommends Christianizing American Indians by peaceful means.<sup>21</sup>

Locke uses the American Indian as an example to explain the origin of political power. He makes it clear that the purpose of the

*Two Treatises* is to justify the glorious and bloodless revolution of 1688, to restore power in the consent of the people. Consent theory was defended by a sustained attack on the doctrine of absolute monarchy or the divine right of kings to arbitrary power. Filmer's popular defense of this doctrine, *Patriarcha*, was Locke's primary focus throughout the *Treatises*; Locke summarized it as the "[d]ivine unalterable right of sovereignty, whereby a father or a prince hath an absolute, arbitrary, unlimited, and unlimitable power, over the lives, liberties, and estates of his children and subjects; so that he may take or alienate their estates, sell, castrate, or use their persons as he pleases, they being all his slaves, and he lord proprietor of every thing, and his unbounded will their law."<sup>22</sup> With regard to the origin of government, Filmer argues that people are not free but born in subjugation to their parents. This royal or fatherly authority was first vested in Adam and by right subsequently belongs to all princes. Locke contends that people are born free and have a natural right to life, liberty, and private property. Monarchy can be justified only by the indirect consent of the people through parliament. He explains that "to understand political power right, and derive it from its original, we must consider what state all men are naturally in" (4).

Locke needs to present an image of the peaceful, friendly American Indian to represent the primitive condition of humans and explain the origin of private property and government. Contrary to Hobbes's notion of life in a state of nature being nasty, brutish, and short, a war of all against all, Locke argues that this prepolitical society exists in a state of peace, good will, mutual assistance, and preservation. This is a state of liberty, but not license, for people do not have the right to destroy themselves or others. The state of nature, says Locke, "has a law of nature to govern it, which obliges every one: and reason, which is that law, teaches all mankind who will but consult it, that being all equal and independent, no one ought to harm another in his life, health, liberty, or possessions" (6). Moral rules are given by God and form the law of nature, natural law, or law of reason; this law is "set as a curb and restraint" to exorbitant desires (1.3.13). Locke maintains that contracts are morally binding in a state of nature. "The promises and bargains for truck, etc., between . . . a Swiss and an Indian, in the woods of America, are binding to them, though they are perfectly in a state of nature in reference to one another. For truth and keeping of faith belongs to men as men, and not as members of society" (14).

Locke paints such an attractive picture of this stage that one wonders why people would consent to leave it for membership in a political society. Locke's answer involves recasting the American Indian (as he describes all prepolitical people) as somewhat less than peaceful and good willed. The state of nature itself involves stages of progress, from peaceful coexistence with few possessions to conflict when possessions are enlarged, to a possible state of war when money is introduced. He contends that even though the law of nature is intelligible to all rational people, bias, self-interest, and ignorance of the law make its adoption impractical: "For though the law of nature be plain and intelligible to all rational creatures; yet men being biassed by their interest, as well as ignorant for want of study of it, are not apt to allow of it as a law binding to them in the application of it to their particular cases" (124). Further, since "everyone in that state being both judge and executioner of the law of nature, men being partial to themselves, passion and revenge is very apt to carry them too far" (125). Since there is a need for an established, settled, known law, people "are quickly driven into society" (127). Locke is not simply engaged in a descriptive account of the origin of government. If we note his emphasis on the terms *rational* and *ignorant*, it is evident that the text is intended to justify the right to rule by the intellectual, Christian elite. Since American Indians do not recognize the obligations of the law of nature, e.g., the duty to preserve all mankind by labor and accumulation of private property, they would at some point in history be quick to gain such knowledge. The savages would be civilized. American Indians were generally puzzled by European notions of progress. A Mohegan states, "The times are exceedingly alter'd, Yea the times have turn'd everything upside down, or rather we have Chang'd the good Times, Chiefly by the help of the White People, for in Times past, our Fore-Fathers lived in Peace, Love, and great harmony, and had everything in Great plenty. . . . But alas, it is not so now, all our Fishing, Hunting and Fowling is entirely gone."<sup>23</sup>

## II. PROPERTY RIGHTS

Locke points out that when harmony in a state of nature is disturbed by war, people have need of civil authority to settle disputes. The consent that establishes government entails sacrificing individual liberty to majority rule for the safety and good of the whole. The "great and chief end" of government, says Locke,

is the preservation of property—property defined as life, liberty, and estate (124). Locke's concern is with private property and its justification. In addition to Acosta, Locke was influenced by the early developmental views of Grotius, Hobbes, and Pufendorf. Like Pufendorf, Locke contends that in the first stage of society all things lay open to all men:

God, who has given the world to men in common, has also given them reason to make use of it to the best advantage of life and convenience. The earth and all that is therein is given to men for the support and comfort of their being . . . all the fruits it naturally produces and beasts it feeds belong to mankind in common, as they are produced by the spontaneous hand of nature; and nobody has originally a private dominion, exclusive of the rest of mankind in any of them as they are thus in their natural state (26).

Given the assumption of an original commons, Locke attempts to justify private property "and that without any express compact of all the commoners" (25). Unlike Grotius and Pufendorf, Locke insists that private ownership of land does not rest on the consent of anyone who may occupy such land.

Locke's view of property has been read as a justification for the displacement of American Indians. According to Lebovics, the arguments as set forth in the *Second Treatise* are logically inadequate and irrelevant "to English society both at the moment of the composition . . . and that of its publication." Locke's intention, he argues, is to justify "land for the taking in the New World."<sup>24</sup> Michael K. Green contends that "Locke's whole account of property can be read as a justification for the displacement of the Native Americans." Arneil claims that, "aware that Indians in the New World could claim property through the right of occupancy, Locke developed a theory of agrarian labour which would . . . specifically exclude the American Indian from claiming land."<sup>25</sup> Tully construes the central concepts of the *Second Treatise* as an argument intended to justify "European settlement in America without the consent of the native people."<sup>26</sup> Although these claims go beyond the evidence provided in the *Essay* and the *Second Treatise*, they may not be entirely lacking in credibility.

Locke contends that, since God gave the world to men for the greatest conveniences of life, "it cannot be supposed he meant it should always remain common and uncultivated. He gave it to "the use of the industrious and rational (and labour was to be his

title to it)" (39). The "law of self preservation" dictates taking without consent, for "this law of reason makes the deer that Indians who hath killed it; 'tis allowed to be his goods who hath bestowed his labour upon it, though before, it was the common right of every one" (30). The American Indian can claim property in the fruit or venison and other goods that nourish him as well as shells and other items removed from the common for the support of his life. The amount to be justly appropriated is limited to "as much as any one can make use of to any advantage of life before it spoils" (31). Locke's major claim—"[t]he chief matter of property—is the earth itself. American Indian dispossession is theoretically possible because land, says Locke, "is acquired as the former. As much land as a man tills, plants, improves, cultivates, and can use the product of, so much is his property. He by his labour does, as it were, inclose it from the common" (32).

The waste limitation holds for land as well as for perishable goods, for Europeans as well as American Indians. An individual may appropriate as much land as he can use and cultivate. Any property that spoils or lies in waste is not appropriated and may be taken by others. Waste is defined as "land that is left wholly to nature, that hath no improvement of pasturage, tillage, or planting" (42) Once money is introduced into the state of nature, the spoilage limitation is lifted; a person may thus "fairly possess more land than he himself can use the product of, by receiving in exchange for the overplus, gold and silver, which may be hoarded up without injury to anyone, these metals not spoiling" (50).

Locke's agricultural argument was certainly not new. In the 1630s John Winthrop, the first governor of the Massachusetts Bay Colony, argued that "that which lies in common, and hath never been replenished or subdued is free to any that possesse and improve it"; and, further, that "if we leave them sufficient for their use, we may lawfully take the rest, there being more then enough for them and us."<sup>27</sup> Similar views were expressed by Luther, Calvin, Purchase, Sir Thomas More, and other well-known figures. Locke's arguments are essentially Puritan. Colonists were both morally and legally justified in taking native waste land and subduing it, because God intended that land be cultivated.<sup>28</sup>

The image of the "wild Indian who knows no inclosure" (26) is typical of the sixteenth and seventeenth centuries; roaming over land did not constitute labor or rational use. Locke's view of waste is not confined to hunting or roaming tribes. That many tribes did labor (plant, cultivate, and improve land) was obviously known

to Locke. Enclosure and planting, however, are not sufficient to establish property rights. Locke argues, "But if either the grass of his inclosure rotted on the ground, or the fruit of his planting perished without gathering, and laying up, this part of the earth, notwithstanding his inclosure, was still to be looked on as waste, and might be the possession of any other" (38). This dictate occurs in the context of a discussion of Biblical ages.

There is nothing in the above arguments that would indicate that Locke believes American Indians can be exterminated for land. Locke does not say that Europeans are justified in violent invasions of non-sedentary agricultural lands or that American Indians can be taken as slaves. He does not say how wasteland is to be taken by others. His account is descriptive, at times normative, and usually predictive. He explains that in the beginning:

Cain might take as much ground as he could till, and make it his own land, and yet leave enough to Abel's sheep to feed on; a few acres would serve for both their possessions. But as families increased, and industry enlarged their stocks, their possessions enlarged with the need of them; but yet it was commonly without any fixed property in the ground, they made use of, till they incorporated, settled themselves together, and built cities, and then by consent, they come in time, to set out the bounds of their distinct territories, and by laws within themselves settled the *propertics* of those of the same society (38).

Locke may have made the same prediction concerning all inhabitants of America. He often compares the first peopling of the world by the children of Adam or Noah to European relationships with American Indians. The analogy demonstrates smallness of possessions but does not account for cultural variance in America. Most often his primary concern is not with American Indians. Paragraph 39 clearly shows his focus: "And thus without supposing any private dominion, and property in Adam, over all the world, exclusive of all other men . . . we see how labour could make men distinct titles to several parcels of it, for their private uses; wherein there could be no doubt of right, no room for quarrel." His concern is absolute monarchy. Contrary to Lebovics's claim, Locke's arguments were relevant to a host of problems facing English society; as Locke points out, it was important to argue for the preservation of natural rights "to save the nation when it was on the brink of slavery and ruine."<sup>29</sup> It was not

sufficient for Locke to refute Filmer without providing an alternative consent theory that justifies private property.

Locke was undoubtedly interested in various justifications for colonizing America. He was familiar with the theories of Vitoria, Las Casas, Sepúlveda, Grotius, Pufendorf, and many others. As Arneil points out, the "question of property and the right of England to appropriate land already claimed by native Americans or other European nations is central to the colonial debates" of Locke's era.<sup>30</sup> It is possible that he intended to refute Filmer, provide an alternative theory, and at the same time justify taking American Indian land. However, Locke's arguments, when applied to American Indians, are confused and incomplete. He is certainly not as explicit as his predecessors or contemporaries concerning the problem of developing occupied wasteland. Locke does not have a sustained theory or argument concerning cultural conflict and its consequences. He seems to assume that American Indians share at least some European values.

The desire to accumulate property beyond immediate or short-term need is regarded as universal. Locke was familiar with the sophisticated and often lucrative systems of trade that American Indians developed with Europeans. Since natives participated in the trade of perishable goods for shells, metal, and other durable goods, Locke concludes that they "have agreed to disproportionate and unequal possession of the earth" (47-50). This "tacit and voluntary consent" to enlarge possessions by the use of money is justified prior to the establishment of government (47). C.B. Macpherson notes that Locke sees land itself as just a form of capital, money to be distributed in trading stock or materials and wages, land to be used to produce commodities for trade.<sup>31</sup> When it comes to land, Locke does not consider American Indians "industrious and rational." Since they do not participate in commercial cultivation, they cannot complain when land is cultivated by Europeans. Of course, American Indians did not consent to private and disproportionate ownership of land. They did complain and did resist.

In his 1625 *A Discourse on Virginia*, Samuel Purchase argued that English title in America was justified in all ways imaginable: by right natural, right national, right by first discovery, by accepted trade, by possession surrendered voluntarily, by gift, by birth, by bargain, and sale, "by forfeiture in that late damnable treachery and massacre, and the fatal possession taken by so many murdered English men"; further, a true tenure from Christ; because of

their "treachery" and wild nature, natives could not share in this tenure.<sup>32</sup> More also argued that if natives refuse to live according to settlers' law, their territory is forfeited. Both contend that if natives resist the taking of their land, they become aggressors in war; developers of such land may justly kill or enslave captives.

### III. CONQUEST AND RESISTANCE

Locke's exact position on just war and native resistance is not clear. Glausser notes that "Locke nowhere says that those who would develop a wasteland may justly kill or enslave those who resist."<sup>33</sup> Nonetheless, recent interpretations place Locke in the historical context of More, Purchase, and Sepúlveda, or conquest and genocide rather than peaceful negotiation, treaties, or agreements. Green, for example, argues that Locke characterizes resistance as a war between the rational-industrious and the covetous-lazy: "These latter are unable or unwilling to labor as the agriculturalists do. The Native Americans, then, become the 'noxious creatures,' who have not the use of reason. They become wild and savage beasts of prey, the metaphor that Locke uses to characterize those who break the Laws of Nature. However, according to the law of war, it is legitimate for the victor to reduce the unjust aggressors in a war to slaves and to exercise despotic power over them" (p. 7).

Tully construes several passages of the *Second Treatise* as evidence that Locke supported dispossession by force. The sections of concern, 8 through 11 and 17 through 19, are intentionally taken out of context and applied to American Indians. Tully states,

When either slavery failed or all other means of dealing with the Amerindians proved ineffective, the practice in the colonies was to make war against the local tribes in a piecemeal fashion. . . . The usual justification for wars of this type was that the Indians had resisted the settlers in some way or stolen something, and so violated natural law, activating the settlers' right to defend themselves and avail themselves of the rights of war. Locke underscores in no uncertain terms the natural law right to punish theft and violence with death and he construes this as a state of war.<sup>34</sup>

Tully goes on to point out that offenders are characterized by Locke as "Wild Savage Beasts" who "may be destroyed as a Lyon or a Tyger" (11, 16). Tully points to section 10 in which Locke



argues that the governments of England, France, and Holland have a right to put to death any Indian who violates natural law. Similar interpretations are offered by M. Seliger, W. Glusser, H.M. Bracken, and Richard H. Popkin.

Bracken and Popkin base their interpretations on a connection between Locke's empiricism and racism. If Locke does not openly support slavery and war against natives, this position can be deduced from his theory of wasteland, his financial involvement in the slave trade, and his position that humans are to be judged by observable characteristics only. According to Bracken, Locke assumed that "Africa and the Americas were waste land. If their residents resisted the take over of these waste lands, they could properly be taken as captives in a just war and made perpetual slaves."<sup>35</sup> Seliger contends that whether natives consent to the use of money or not, the "unavoidable implication of the whole inane argument is that the natives' resistance to the conquest of their waste land turns them into aggressors and the Europeans, who appropriate the 'waste,' into the party which wards aggression off."<sup>36</sup>

Although there may be some grounds for this type of interpretation, Locke says a good deal to make one remain skeptical about his position. In paragraph 180 he indicates that his view of conquest is historically different from traditional doctrines. He explains that a conqueror "has not thereby a right and title to the possessions of those conquered." Conquest does not give a nation the right to rule or the right to the land of the vanquished. This, he says, "I doubt not, but at first sight will seem a strange doctrine, it being so quite contrary to the practice of the world." The common practice gave nations the right to territory and spoils; the conquered could be banished or forced into slavery. Perpetual slavery is not a view that fits into Locke's theory of just war. The children of slaves, not having committed an act of violence that deserves death, could not become slaves.<sup>37</sup> A just war is a defensive war to protect life and property, slavery justified only if aggressors are captives taken in such a war: "Indeed having, by his fault, forfeited his own life, by some act that deserves death; he, to whom he has forfeited it, may (when he has him in his power) delay to take it, and make use of him to his own service" (23). With regard to conquest Locke states,

But granting that the conqueror in a just war has a right to the estates, as well as power over the persons of the conquered;

which, 'tis plain, he hath not: Nothing of absolute power will follow from hence, in the continuance of the government. Because the descendants of these being all free-men, if he grants them estates and possessions to inhabit his country . . . they have, so far as it is granted, property in. The nature whereof is, that without a man's own consent it cannot be taken from him (193).

Locke's views can be applied to American Indians only with some difficulty. The passages to which Green and Tully refer are not intended to be descriptive of natives. Locke is discussing resistance in civil society, the right of the people of England to resist arbitrary power and abuses of government. The noxious, wild, and savage beasts of prey who may be destroyed as a lion or tiger is a reference to despots; as Laslett points out, the subject "is clearly the established government of a country, Locke's country, and these are the words applied to it when it claims the right to 'Absolute, Arbitrary Power' ('Having quitted Reason' to do so)." Charles and James Stuart "fit easily enough into the role of those 'wild Savage Beasts.'"<sup>38</sup> Tully nonetheless believes that these passages fit the punishment of American Indians for resisting commercial cultivation of land. "I am quite aware," he says, "that these passages in chapters 2 and 3 are standardly interpreted as references to the right to punish Charles II in an armed revolt. Be this as it may, the very terms Locke uses to describe the offenders who may be 'destroyed' are the terms used to describe, and so dehumanize Amerindians in the books in Locke's library."<sup>39</sup> This may not be sheer speculation on the part of Tully or Green, but may be grounded on a reasonable suspicion that Locke's unstated view may conflict with the liberal or egalitarian philosophy for which he is known. However, given the books in Locke's library, it is just as possible to argue a more generous interpretation.

Locke was an enthusiastic reader of literature and debates concerning the character of American Indians, slavery, and conquest. Felix Cohen dates the antecedents of Indian legal history to Vitoria's 1532 work concerning the right of Spain to title in the New World. Vitoria was addressing the question of whether conquest and enslavement were necessary to convert natives to Christianity, whether the *encomienda* system with its attendant brutality was inconsistent with the Catholic religion.<sup>40</sup> The system enslaved, tortured, and decimated native populations. The consequences of Spanish conquest were so appalling that in 1550 the

king convened a council to decide future policy. The issues concerning the justice of the methods used to extend the Spanish empire were debated at Valladolid by Las Casas and Sepúlveda. Locke was thoroughly familiar with these debates.

According to Tully, Locke follows Vitoria's justification of conquest and supports the right of Spaniards to use force against natives who violate natural law.<sup>41</sup> Unfortunately, this interpretation just begs the question. Use of force in self-defense was not at issue. Vitoria's work does not cohere with the interpretation of Locke presented by Tully. Vitoria's analysis would make Europeans, not American Indians, the usual aggressors in war. Natives, he claims, are the true owners of land and consequently cannot be conquered by force of arms and enslaved. Land could be purchased or taken only with the express consent of the natives. This influential view provided the basis for European relations with American Indians; Vine Deloria, Jr. and Clifford Lytle point out that "the impact of Vitoria's view on European-Indian relations for the next two hundred years was very important because it encouraged respect for the tribes as societies of people. Treaty-making became the basis for defining both the legal and political relationships between the Indians and the European colonists."<sup>42</sup>

Sepúlveda argues that war against natives is justified if not waged cruelly and not waged for riches alone. It is justified to spread the Christian faith, to convert natives to the use of reason, and to teach proper morals. Natives are regarded as naturally inferior to the Spanish; they are said to be given over to all kinds of passions, including cannibalism. They war among themselves, worship idols, have no written laws or private property, possess an inborn rudeness, and sin against nature. They are regarded as natural slaves; war against such infidels is justified for their own good. Sepúlveda regards force as a necessary prelude to Christianizing; since natives do not entirely lack reason, they can be educated in Spanish law and ethics. If natives refuse to assimilate, a just war may be waged and their goods confiscated as the property of the conquering prince. The conqueror in such a just war may kill or enslave his enemy. Sepúlveda concludes with a utilitarian justification: The introduction of iron, wheat, barley, horses, goats, and the Christian religion to the natives justifies conquest. The *encomienda* system is regarded as just retribution for those who wage war against the Spanish.

Las Casas contends that the souls of all men are created equal; the laws of nations and natural law apply to Christian and gentile

alike. Rejecting the Aristotelian notion of natural inferiority and slavery, he argues that American Indians possess the same positive characteristics as other men. Not only are they devout workers, but they appear to be more religious than the Greeks and Romans. American Indians are not beasts or semi-animals, but just as rational as Europeans. Las Casas stresses the great diversity among tribes, the beauty of their art, the efficiency of their governments, and their peaceful nature. Conquest constitutes cruel and unjust war, contrary to the Christian religion. Natives are not to be dispossessed of their property and should not be enslaved for any reason. The conversion of American Indians to Christianity should be conducted by peaceful persuasion. Although the judges at Valladolid did not reach a decision on the dispute, the views of Las Casas influenced future legal theory; the Council of the Indies, says Acosta, prescribed very different methods for new expeditions.<sup>43</sup> Locke's work exhibits a curious blend of these theories. His descriptions of American Indians are similar to those of Sepúlveda; natives are thought to be inferior in morals, not to work, to have no religion, and to live by passions rather than reason. He also employs a utilitarian argument that conversion benefits natives, in that it enables them to obtain the comforts of life. Like Vitoria and Las Casas, Locke does not believe in innate inferiority and rejects natural slavery as well as conquest as means to take property. Shaftsbury and Locke favored peaceful relations with the natives of Carolina.

#### IV. WASTELAND, GENOCIDE, AND TREATIES

In the *Fundamental Constitutions of Carolina*, Locke states,

But since the natives of that place, who will be concerned in our plantation, are utterly strangers to Christianity, whose idolatry, ignorance, or mistake, gives us no right to expel, or use them ill; and those who remove from other parts to plant there, will unavoidably be of different opinions concerning matters of religion, the liberty whereof they will expect to have allowed them, and it will not be reasonable for us on this account to keep them out; that civil peace may be maintained amidst the diversity of opinions, and our agreement and compact with all men may be duly and faithfully observed; the violation whereof, upon what pretence soever cannot be without great offence to Almighty God, and great scandal to the true religion, which we profess.<sup>44</sup>

Farr points out that the temporary laws Locke had a part in drafting might give one a different impression of his view than that of the *Second Treatise*. Locke instructs, for example, that "no Indian upon any occasion" is to be "made a slave; or without his own consent be carried out of our country." There is also a suggestion that he may not have been interested in the development of all waste land. Another temporary law would require that territory occupied by American Indians be respected and that land near such settlements "be left untaken up and unplanted on for the use of the Indians."<sup>45</sup>

Such proclamations lead Arneil to speculate that Locke's theory of conquest is completely consistent with the case made by the defenders of the English plantation: "[A]gricultural settlement rather than conquest, considered to be the Spanish technique, is the better method of colonization." She points to Locke's instruction to the colonists of Carolina: "Neither doe we thinke it advantageous for our people to live by rapin and plunder which we doe not nor will not allow. Planting and trade is both our designe and your interest and . . . shall lay a way open to gett all the Spaniards riches."<sup>46</sup> Locke's position in the *Constitutions* is decidedly practical, consistent with lucrative trade and with the concern about France's gaining title to native lands. It does not, however, represent a general theory. Nothing Locke says explains how waste land is to be appropriated when occupied by natives who resist such expropriation. Here he appears to suggest that a just war may not be waged against American Indians. The *Second Treatise* does not directly speak to the issue but appears to support the views of Sepúlveda, Purchase, Winthrop, and others who argue that just war may be waged if natives resist expansion.

Tully claims that Locke's view is consistent throughout, that neither the *Constitutions* nor the *Second Treatise* gives natives a natural right to own vacant land. He argues that Locke's proposal to grant natives individual tracts of land in Carolina is predicated on native consent to European values; viz., "aboriginal peoples consented to" the use of money and "to the system of commercial agriculture, and so their natural right to the means of preservation must be realized in this system."<sup>47</sup> This certainly does not comport with Locke's description of the natives given use of this land. They may have consented to trade, but there is no evidence that they consented to a market economy or commercial agriculture. There is definitely a tension between the *Constitutions* and the *Second Treatise*.

Locke may have attempted to deflate such concerns by speaking of America as such a vast wilderness that conflict need not occur. He says, for example, that appropriation and improvement of any parcel of land does not prejudice any other man, for "there was still enough, and as good left; and more than the yet unprovided could use. So that in effect, there was never the less left for others because of his inclosure for himself. For he that leaves as much as another can make use of, does as good as take nothing at all" (33). However, at some point in the state of nature, conflict is inevitable. Reservations were created on Long Island in 1666; Locke may have had this type of arrangement in mind. This obviously does not solve the problem of resistance or the justice of forced removal. Locke's statement in the *First Treatise* (130) that a planter in the West Indies "might, if he pleased," muster an army against Indians "to seek reparation upon any injury received from them" does not show, as Glauesser suggests, that "he takes it for granted the justice of a developer's 'resistance' to such 'aggression.'"<sup>48</sup> The claim is simply too ambiguous; Locke does not provide a context nor state the type of injury. Further, the "army" in this passage is a patriarch's family.

Whether force can be used against American Indians depends entirely on the situation. Colonization itself was not in question. As Herman J. Viola points out, "English Indian policy and practice remained divided, confused, and even contradictory throughout the colonial period."<sup>49</sup> Grants, promises, and treaties might be used to pacify American Indians, even though Locke does not recognize consent necessary to appropriate land. Locke may have envisioned a utilitarian justification for taking land by force of arms if peaceful appropriation failed. As Green points out, "once agriculture was invented, hunting and gathering violated one of the basic laws of nature; it tied up resources in such a way that others could not derive benefits from them."<sup>50</sup> This does not fit in well with his theory of conquest or with the natural law right of self-preservation. However, Locke may not have equated such force with genocide but with retreat and removal to other territory.

Locke clearly does not recommend, nor would he approve of, genocide. If by *genocide* one means the intentional attempt to eliminate all members of a culture, natural law and charity would explicitly rule this out. American Indians have a natural right to self-preservation, for no one should "be left to starve and perish" (184), and therefore "no man could ever have a just power over the

life of another, by right of property in land, or possessions; since 'twoud always be a sin in any man of estate, to let his brother perish for want of affording him relief out of his plenty."<sup>51</sup> Further, given the importance he attaches to treaties and promises, it is unlikely that he would have approved of the egregious treaty violations of eighteenth- and nineteenth-century Euro-Americans. Promises and treaties are binding in a state of nature, "for truth and keeping of faith belongs to men, as men, and not as members of society" (14). In the *Essay*, Locke points out, "[T]hat men should keep their compacts, is certainly a great and undeniable rule in morality" (1.3.5).

Overall, Locke's claims suggest that he was confident that American Indians would eventually enter civil society and assimilate through education. He thought it was obvious that commercial agriculture was superior to native agriculture and use of land:

There cannot be a clearer demonstration of any thing, than several Nations of the Americans are of this, who are rich in land, and poor in all the comforts of life; whom nature having furnished as liberally as any other people, with the materials of plenty, i.e. a fruitful soil, apt to produce in abundance, what might serve for food, rayment, and delight; yet for want of improving it by labour, have not one hundredth part of the conveniencies we enjoy: And a King of a large and fruitful territory there feeds, lodges, and is clad worse than a day labourer in England (41).

Like Sepúlveda, Locke offers what might be taken as well-intentioned justifications for taking land: economic gain, greater conveniences for American Indians, and true religion. Since the American Indian often became an obstacle to English wealth, paternalistic arguments of this sort were not uncommon. Because he was not always forthright with the facts as he knew them, Locke's intentions are not beyond question.

European and American Indian value systems differ so significantly that it is highly doubtful that Locke really understood native culture. The spiritual value of land is an important aspect of land use for American Indians, a concept Locke did not comprehend. The so-called conveniences produced by a market economy were not considered as such by native people. Yet, as Salisbury points out, cultural differences are not the only major variable in dispossession: "[W]hen land-hungry settlers did not immediately

follow the explorers and traders, Indians survived and interacted with Europeans over long periods with varying degrees of advantage." Salisbury points to the "unprecedented economic and social revolution that had begun to transform parts of Europe, particularly England" and was spreading to North America.<sup>52</sup> Locke's interest in America is primarily economic.

Assessing Locke's responsibility in American Indian dispossession is difficult, if not impossible. Portions of the *Second Treatise* have been used by those seeking justification for taking native land as well as by those seeking justification for native rights to their land and culture. Since Locke falls short of committing himself on central issues, his work lends itself to conflicting interpretations. As Tully points out, Locke's view of property was not significantly different from that of his predecessors. Locke popularized the agricultural argument and distanced himself from the views of Grotius and Pufendorf with the claim that land can be taken without consent. Nonetheless, one can remain skeptical about the claims that this "powerful theory," as Tully contends, was central to native dispossession and to United States policy toward American Indians. The Crown's proclamation of 1763 favored peaceful purchase of American Indian land. American radicals did not simply appeal to Locke's argument for appropriating waste land, but quoted any source that would support the right to appropriate and govern their own affairs, including Grotius, Pufendorf, and classical sources. As John Dunn correctly notes, the only sustained application of Locke's theory of property to American circumstances came from John Bulkley.<sup>53</sup>

Locke's arguments were interpreted in a more favorable light by those using his natural law view of self-preservation to argue for native title to territory occupied; Blackstone and Wharton appealed to this argument, concluding that native title could be extinguished only by consent and treaty. As Tully points out, this interpretation of Locke is probably incorrect. Nevertheless, it continues to enjoy some popularity, especially among American Indian authors. Robert W. Venables, for example, argues that Locke's native is the "noble savage," that natural law and compacts preserve American Indian title.<sup>54</sup> Locke does not regard occupancy as labor, as Blackstone and Wharton contend; self-preservation does not entail title to any specific territory and is perfectly compatible with small reservations. When the self-preservation of colonists conflicts with that of natives, Locke sides



with those who perform intensive labor to preserve the greater whole.

Locke's argument that land can be taken without consent was not influential and was not referred to by policy-makers in England or the United States. Land was purchased and treaties continued to be signed well into the nineteenth century.<sup>55</sup> Whether or not natives were thought to have sovereignty, British and U.S. policy generally dictated that force of arms was not a legitimate way to obtain land, that land could not be taken without the voluntary consent of the natives who occupied and used the land. Policy and theory, however, often conflicted with the realities of colonial life and frontier expansion. When American Indians could not be convinced to sell their land, could not be bribed or tricked, theory was often dismissed in favor of arms. John Chester Miller contends that the function of government was not to eradicate American Indians but to eradicate the superstitions, customs, and attitudes that impeded their transition from the state of nature to civilized society.<sup>56</sup> In this regard, Locke's *Essay* had more of an impact on native culture than the *Second Treatise* theory of property.

## V. IMPACT OF *ESSAY*: ASSIMILATION

In the *Essay*, Locke contends that all ideas are derived from experience. He argues that because humans are not born with innate ideas or knowledge, the type and degree of knowledge exhibited by any human being is a function of environment and culture. Locke's contention that all men are created with equal capacities influenced Thomas Jefferson's view of American Indians as people who were simply backward but capable of entering civilization with proper education. Insofar as they gave up tribal organization and communal ownership of land, adopted European religion, farming, and education, they would possess the same rights to life, liberty, and property as Euro-Americans. Short of assimilation, they were to be granted property on reservations. The *Essay*'s environmentalism led Jefferson to the position that the transition from savagery to civilization was to be gradual. As Bernard W. Sheehan explains, the land would be surrendered at a rate corresponding to the alteration in the native's way of life: "[T]he Indian would never be asked to give up more than the circumstances of their gradual transformation required; the white man would never request more land than the orderly advance of

civilized life across the continent demanded."<sup>57</sup> Like Locke, Jefferson was not exactly consistent in theory and practice. Not only did he seek passage of a constitutional amendment to transport eastern natives beyond the Mississippi, he also attempted to run them into debt with the hope of payment by cession of lands.

Sheehan correctly places Locke's *Essay* as more crucial to native dispossession than the *Second Treatise*. If the mind is a blank tablet, American Indians would only need to receive new and correct ideas about God and man's relationship to the land to be spared. Since human beings do not have a real essence, they can be transformed by changing the environment. The roots of nineteenth-century allotment acts date back to the colonial period, Locke's epistemology providing the seeds of removal and cultural extinction. With the hope of giving natives an appreciation of private property and farming, the 1887 Dawes Allotment Act authorized the president to allot reservation land in small parcels to individual American Indians. Surplus land was purchased and made available to white settlers.

The fact that Locke may not have held an empirical theory of racial inferiority, as Farr contends, does not necessarily place his philosophy in a positive light concerning American Indians. Assimilation policies were often based on racism as well as religion. Bracken argues that Locke's empiricism lends itself to "soft racism," namely, the position that people of color are inferior, but that this inferiority is remediable. For Locke it is remediable only by stripping natives of their entire culture, by replacing spiritual relationships with economic relationships. Locke's Indian is an inferior, ignorant, uncivilized human, a being capable of rising to a state of civil society by the use of reason—not biologically inferior, but inferior nonetheless and more akin to animals than rational humans. For most American Indians, reservations and assimilation meant death, both physical and spiritual. The Kiowa chief Satanta proclaimed, "I have heard that you intend to settle us on a reservation near the mountains. I don't want to settle. I love to roam over the prairies. There I feel free and happy, but when we settle down we grow pale and die."<sup>58</sup> Assimilation policy fostered dependency on whites. For Locke, abstract reasoning, religion, morality, and property are intimately connected. That land can be taken without consent even when enclosed is a view that he can justify only by appealing to God. In 1676 a Pequot complained of this: "How they could go to work to

enslave a free people, and call it religion is beyond the power of my imagination."<sup>59</sup>

Tully is perplexed that scholars of European history have passed over Locke's argument of appropriation without consent in silence. This argument, he contends, justifies "the most contentious and important events of the seventeenth century and one of the formative events of the modern world." On the other hand, he says, "among scholars who specialize in the European dispossession of Amerindians reference to Locke's argument is commonplace."<sup>60</sup> I do not find this very surprising. First, Tully may exaggerate the historical importance of this argument; second, the references that are commonplace are mere citations. In general, European specialists of dispossession do not discuss Locke at great length. James Axtell does not discuss him at all. American Indian scholars rarely discuss Locke's appropriation arguments or his political works. A few revisionist historians such as Drinnon and Stannard are the exception to the rule. In all cases, the agricultural argument is usually analyzed in detail, but this argument was not peculiar to Locke, and often he is not mentioned. References to Cushman are just as prevalent as those to Locke. Speaking much as Locke did a century later, Reverend Cushman argued that American Indians were lazy and "not industrious"; they lacked the "art, science, skill or faculty to use either the land or the commodities of it, but all spoils, rots, and is marred for want of manuring, gathering, order"; their land "is spacious and void, and there are few and [they] do but run over the grass, as do also the foxes and wild beasts." The natives of New England "inclose noe land" nor have "any tame cattle to improve the land by," and therefore cannot claim legal title to their territory.<sup>61</sup> Granting that Locke's argument was somewhat influential, it is usually passed over or simply mentioned as part of a larger more influential argument, viz., the argument from God's will. Although there seems to be no general agreement about Locke's influence and responsibility, there is little question concerning the role of Christianity in dispossession. American Indian scholars consider Locke just one of many European philosophers who used Christianity as an ideological weapon. His views are given no more importance than those of Augustine, Descartes, More, Jefferson, and others. The common thread of European thought is the emphasis placed on reason, logic, and religion.

### The *Essay* and Religion

The ultimate justification for appropriation without consent, that which legitimizes chapter 5 of the *Second Treatise*, is both economic—the utilitarian notion of greater conveniences—and religious—God’s command. “So that God,” says Locke, “by commanding to subdue, gave authority so far to appropriate” (35). In a great wilderness people do not need the consent of fellow commoners—they have the consent of God. God, “when he gave the world in common to all mankind, commanded man also to labour, and the penury of his condition required it of him. God and his reason commanded him to subdue the earth, i.e. improve it for the benefit of life. . . . He that in obedience to this command of God, subdued, tilled and sowed any part of it, thereby annexed to it something that was his *property*, which another had no title to” (32).

The law of reason, God’s law, demands hard labor. The inhabitants of the “wild woods” and “uncultivated waste” of America are “needy and wretched” because they lack sufficient reason to obey the laws of God. Thus, any land granted to lazy and ignorant natives is by charity only. To own property is to be civilized, and to be civilized is to follow Christian morality. Locke does not discuss the attempts by Europeans to educate American Indians in schools and praying towns. Since he is pessimistic about most humans overcoming their “passionate nature” or “brute appetites” for a life of reason, he may have regarded these attempts to assimilate the Indians with some skepticism. Since American Indians were considered to be like children or the idle poor of England, it might be reasonable to assume that Locke would approve of the use of force to instruct them in morality; once laboring, without the leisure to cultivate reason, they would live by faith.

Richard Ashcraft argues that the *Essay* must be understood in the context of religion. Since “Locke believes the principles of morality capable of being *known* with certainty, while the truth conveyed through revelation must be *believed* by men, demarcating the boundaries between faith and knowledge becomes the paramount issue of the *Essay*.” Locke explains that “morality and divinity” are “those parts of knowledge, that men are most concern’d to be clear in.”<sup>62</sup> Roland Hall speculates that “the rationality of true religion could be the point of the *Essay* . . . so that in effect ‘religion which should most distinguish us from beasts, and

ought most peculiarly to elevate us, as rational creatures, above brutes, is that wherein men often appear most irrational” (4.18.11). Thus Locke equates “the possession of religion with that of reason.”<sup>63</sup> The political impact of this equation is considerable. For American Indians who do not accept Christianity, it entails a place in the moral hierarchy that is close to beasts. Bracken complains that Locke’s account of concept-acquisition and learning has proved to be readily compatible with social conditioning and political control. The notion of natural equality does not exclude a social or moral hierarchy based on rationality or conformity to scripture. The *Essay* appears to support a performance model of humankind in which certain political rights, the right to freedom as well as property, must be earned predicated on the correct use of reason.

Peter Laslett points out that Locke did not argue “that the basis of political life is the rule of the rational man over his irrational fellows.”<sup>64</sup> Nonetheless, critics simply point to the compatibility of his views with this practice. Bracken contends that the blank tablet model has not been on the side of egalitarianism precisely “because the model carries with it the need for a group which will be charged with ‘writing’ on the blank tablets. The model has helped justify the creation and growth of an elite class of experts who handle human programming.”<sup>65</sup> The program that would civilize American Indians and make them full members of a moral community involves conformity to the Christian mandate of labor and profitable use of land.

Revolutionaries utilized Locke’s *Essay* as well as the *Two Treatises*. Gordon S. Wood notes that Lockean sensationalism “told the revolutionaries that human personalities were unformed, impressionable things that could be molded and manipulated by controlling people’s sensations. The mind, said John Adams, could be cultivated like a garden, with barbarous weeds eliminated and enlightened fruits raised, ‘the savages destroyed, . . . the civil people increased.’”<sup>66</sup> The premises of the *Essay* gave way to a renewed preoccupation with education. Anthropologists, psychologists, philosophers, and social scientists became the “experts” on stereotyping American Indians and attempting to convert them. Deloria complains, “The fundamental thesis of the anthropologist is that people are objects for observation, people are then considered objects for experimentation, for manipulation, and for eventual extinction.” The total impact of the scholarly community on American Indians “has become one of simple

authority."<sup>67</sup> Ironically, Locke criticized Descartes's doctrine of innate ideas for its potential abuse at the hands of "experts" and politicians. He complains, "And it was no small advantage to those who affected to be masters and teachers, to make this the principle of principles, that principles must not be questioned . . . in which posture of blind credulity they might be more easily governed by, and made useful to some sort of men, who had the skill and office to principle and guide them. Nor is it a small power it gives one man over another, to have the authority to be the dictator of principles, and teacher of unquestionable truths; and to make a man swallow that for an innate principle which may serve his purpose, who teacheth them" (1.4.24).

Whether it is innate ideas of God and morality or Christians writing on blank tablets, American Indians have suffered under the weight of assimilationist policies. Robert Burnette protests that the current goal of the school system fostered by the Bureau of Indian Affairs is not education but acculturation: "Never have I known one teacher in an Indian school or one BIA employee who troubled himself to learn the Sioux language or to acquaint himself with the cultural background of his student."<sup>68</sup> American Indian scholars can find fault with Descartes as well as Locke. The European insistence on scientific method, Christianity, and reason puts all indigenous people at risk. Deloria recounts the 1954 congressional hearings on the termination of federal supervision of American Indians: "Unbelievably, it recommended using the philosophy of Rene Descartes . . . as a method of research." Descartes's *Discourse on Method*, emphasizing clear and distinct ideas, progression from simple ideas to the more complex, was utilized to justify termination of federal services to all natives.<sup>69</sup> In a comparison between the Jewish Holocaust and the American Indian experience, Gregory L. Hill contends that Christianity is clearly evidenced as influencing German and Euro-American thought during genocide attempts and is seen as a justification for those attempts. He goes on to assert that "the Christian based faiths, Catholic, Protestant, Baptist and other, is the only majority religion of the world that mandates conversion or justification of extermination by force."<sup>70</sup>

Locke's position in the *Constitutions* is one of toleration: Natives are to be left alone to practice their own customs and religion. Again, this position was developed for a particular context and may not express Locke's more general view. The Puritans considered American Indians to be morally bankrupt and in league with

the devil. Locke likewise concludes that they have no religion (morals) at all. Although he argues for religious toleration, atheists, lacking a moral code, are considered dangerous and not to be tolerated. That Locke was a sincere Christian does not mean that his beliefs were beneficial to all humans. He has little to say about the education or assimilation of American Indians, remains silent concerning how waste land is to be taken if natives resist, and does not find the African slave trade inconsistent with Christianity. Seliger argues that Locke's failure to answer such questions reflects his "reluctance frankly to admit that in its entirety natural law is not equally applicable to the whole species of men."<sup>71</sup> Locke, of course, argues that it is, and thus conquest and genocide are theoretically wrong; further, American Indians cannot be denied the means of self-preservation. This view of natural law is consistent with the practice of removal, reservations, assimilation—namely, with cultural genocide. Steven Katz defines *cultural genocide* as the "actualization of the intent, however carried out, to destroy the national, ethnic, religious, political, social or class *identity* of a group as these groups are defined by the perpetrators."<sup>72</sup> Locke does not express this intent, but does in a sense predict its actualization; natives would assimilate as they naturally progressed to the stage of civilization.

Locke might be read as one of the many early assimilationists, as Alvin M. Josephy, Jr. explains, who "considered themselves well intentioned with the best interests of the Indians at heart."<sup>73</sup> Locke, Jefferson, and others were fundamentally wrong, most American Indians having no desire to convert to European ways of life. Forced assimilation therefore became prevalent in the nineteenth century. Massive removal and relocation of American Indian tribes to reservations became the rule, followed by laws denying natives the right to speak their own language, to keep their own names, to express their religion, to dance and dress as they wished. This was supposedly done with the best of intentions, to save the American Indian from extinction—to exterminate the culture or tribe and preserve the individual.

As Josephy points out, in most cases conversion to Christianity proved of little help to natives. Many of the Christianized natives were murdered and sold into slavery during Locke's lifetime. John Eliot's converts, isolated in "praying towns," were exterminated by settlers during King Philip's war. In the nineteenth century the "civilized" tribes fared no better; assimilation was not sufficient to keep the Eastern Cherokee from being imprisoned in

stockades and later removed from their homes and land. Drinnon argues that white racism has made it impossible for all but a handful of American Indians to achieve full church membership and full citizenship.<sup>74</sup> The origins of assimilationist policy have been traced to ethnocentric ideology, racism, and economic greed. Deloria contends, "There was never a time when the white man said he was trying to help the Indian get into the mainstream of American life that he did not also demand that the Indian give up land, water, minerals, timber, and other resources which would enrich the white man."<sup>75</sup> Hill also notes that the only consistent policy of the United States has been to maintain control over economic development within American Indian territory.

The works of Jacobs, Jennings, Drinnon, Stannard, and Thornton provide an important perspective on the link between reason, race, and Christianity. Locke's political arguments are cited, integrated with the *Essay*, and placed in the context of Christian ideology. Locke is not given the type of credit for native dispossession that Tully believes he deserves, but nonetheless he is credited, like a host of others, with assuming and popularizing an ideology that led to massive destruction of natives and their culture. There is little doubt, says Stannard, "that the dominant sixteenth- and seventeenth-century ecclesiastical, literary, and popular opinion in Spain and Britain and Europe's American colonies regarding the native peoples of North and South America was that they were a racially degraded and inferior lot—borderline humans."<sup>76</sup> Although one is hard pressed to find a consistent definition of racism in this literature, Locke's disdain of American Indian culture may indicate either a conscious or unconscious belief in white superiority.

The *Essay* may not be a work of politics, but it has had a lasting influence on how Americans relate to one another in the political sphere; people of color are still generally thought inferior to whites; the remedies, now disputed in America's culture wars, are European education and assimilation. American Indian land is still subject to the *Second Treatise* dictate of profitable use, and treaty rights are still violated in the name of economic and cultural progress. The Christian perspective of land as a commodity to be exploited for profit is the dominant paradigm of American government. The land, says an American Indian, "has been eroded, plundered, misused and spoiled. It is the Indian's only real possession. Its destruction assures the destruction of the Indian."<sup>77</sup>



The practice of colonists, settlers, and government was often to take native land by any means necessary, with or without consent. The fact that millions of people had to die to fulfill the Christian mandate to subdue the land is appalling; Locke might have objected to much of this horror.

Locke can be read in many contexts. As Glausser notes, he "has built too many confusions of theory and practice, too many defenses against either being caught in the act or missing the boat." One must recognize "within Locke's work a destabilizing competition of values."<sup>78</sup>

For Tully and others, a solution to the injustice suffered by American Indian people might come from Locke himself. For example, Ashcraft argues that Locke's "broad definitions of property and property rights and his definition of a 'freeman' in terms of equality, age, and reason—rather than the ownership of property—supplied the basis for a democratic distribution of political power." Locke's defense of an elected legislative assembly and his commitment to popular sovereignty "and to the right of popular resistance, as well as his defense of religious freedom, the right to free speech, free assembly, and free press . . . [form] the core values of liberal democratic theory."<sup>79</sup> Tully extols these Lockean values as transcending the ideological constraints Locke placed on them: "What could be a more fitting tribute at the tercentenary of the *Two Treatises* than its self-critical use to expose and justify public action against a monumental injustice . . . that the concepts of property and political society in the *Two Treatises* have served to cover over and legitimate for far too long?"<sup>80</sup>

To many Americans this aspect of Locke's work has not constituted, and cannot constitute, a solution to native problems. Deloria notes that the world of the American Indian is non-Western in conceptualization and philosophy and that "[I]beralism took the ideals and dreams of Western European civilization and dangled them in front of the blacks and young while attempting to force them on the Mexicans and Indians. Then liberalism couldn't produce." Recognition of the spiritual value of humans and the environment may not be possible in a nation dominated by corporate greed. Deloria goes on to note, "The ideals of the Constitution proved unable to hurdle such roadblocks as Congressional seniority, vested economic interests, the impotent morality of a Christian religion that was 'of the world but not in it.' Liberalism pushed the ideology of Western man to its logical extremes and it was found to be unsuitable for racial minorities."<sup>81</sup> If

one seeks a solution from Locke it would entail admitting that most wars with American Indians were unjust wars and that, as Locke says, "the aggressor, who puts himself into the state of war with another, and unjustly invades another man's right, can . . . thereby have no title to the subjection and obedience of the conquered" (176).

## CONCLUSION

Locke certainly can be faulted for being ethnocentric, for not clarifying his positions, for presenting arguments that neglect to mention sophisticated American Indian cultures in favor of arguments that include disparaging images of American Indians. However, the claim that Locke is primarily responsible for American Indian dispossession is not warranted. It is obvious that arguments in the *Second Treatise* were often taken out of context and occasionally used by policy-makers to support their goal of taking native resources; Locke is not responsible for such use. His agricultural argument simply did not play the vital role in dispossession that some scholars have assigned to it. Locke's *Essay* and his theory of knowledge have had a more lasting influence on American Indian culture than anything to be found in the *Two Treatises*. His theory has been used historically to bolster the position of forced assimilation, a position that cannot be found in Locke's work.

## NOTES

1. John Locke, *Two Treatises of Government*, ed. Peter Laslett (New York: New American Library, 1965), paragraph 49. Subsequent references in text to *Second Treatise* are by paragraph number. I have followed the current practice of decapitalization and deitalization of this work.

2. Roy Harvey Pearce, *The Savages of America: A Study of the Indian and the Idea of Civilization* (Baltimore: Johns Hopkins University Press, 1965), 68.

3. James Tully, *An Approach to Political Philosophy: Locke in Contexts* (New York: Cambridge University Press, 1993), 137.

4. Herman Lebovics, "The Uses of America in Locke's *Second Treatise*," *Journal of the History of Ideas* 47 (1986): 567-81; Barbara Arneil, "John Locke, Natural Law and Colonialism," *History of Political Thought* 13 (1992): 587-603; Wayne Glausser, "Three Approaches to Locke and the Slave Trade," *Journal of the History of Ideas* 51 (1990): 199-216; Michael K. Green, "John Locke, Native

Americans, and the State of Nature" (Unpublished paper presented to the American Philosophical Association, Eastern Division, December 1993). Subsequent references to these authors are to these specific works unless otherwise indicated.

5. Richard Drinnon, *Facing West: The Metaphysics of Indian-Hating and Empire Building* (New York: Schocken Books, 1990); David E. Stannard, *American Holocaust: Columbus and the Conquest of the New World* (New York: Oxford University Press, 1992); Francis Jennings, *The Invasion of America: Indians, Colonialism and the Cant of Conquest* (Chapel Hill: University of North Carolina Press, 1975); Russell Thornton, *American Indian Holocaust and Survival: A Population History since 1492* (Norman: University of Oklahoma Press, 1987). Subsequent references to these works by author's name.

6. Neal Wood, *The Politics of Locke's Philosophy* (Berkeley, CA: University of California Press, 1983), 81–82.

7. James Farr, "So Vile and Miserable an Estate: The Problem of Slavery in Locke's Political Thought," *Political Theory* 13 (1986): 278–79.

8. Thomas L. Pangle, *The Spirit of Modern Republicanism* (Chicago: University of Chicago Press, 1988), 12.

9. Farr, "So Vile and Miserable an Estate," 269.

10. Robert Berkhofer, Jr., *The White Man's Indian* (New York: Vintage Books, 1979), 16.

11. Richard Hakluyt, *Hakluyt's Voyages to the New World: A Selection* (New York: Bobbs-Merrill, 1972), 151–52, 86, 160.

12. The term *savage* variously used to mean backward or illiterate, as well as to signify men of the forest or woods. Savages could be noble or brutal.

13. John Locke, *An Essay Concerning Human Understanding*, ed. Peter H. Niddich (Oxford, England: Clarendon Press, 1975), book 1, ch. 2, par. 27. I have followed the current practice of decapitalization and deitalicization of the *Essay*. Subsequent references to *Essay* in text by book, chapter, and paragraph.

14. Locke was aware of the achievements of American Indians in the arts and agriculture.

15. Ronald Meek, *Social Science and the Ignoble Savage* (New York: Cambridge University Press, 1976), 2.

16. Quoted by Robert Williams, Jr., *The American Indian in Western Legal Thought* (New York: Oxford University Press, 1990), 208.

17. Neal Salisbury, *Manitou and Providence: Indians, Europeans, and the Making of New England, 1500–1643* (New York: Oxford University Press, 1982), 31; Anthony F. C. Wallace, *The Long Bitter Trail* (New York: Hill and Wang, 1993) 48.

18. *Second Treatise*, par. 102; Joseph Acosta, *Natural and Moral History of the Indies* (1589; Grimston English translation, 1604).

19. William G. Batz, "The Historical Anthropology of John Locke," *Journal of the History of Ideas* 35: 4 (1974): 669.

20. Quoted in *ibid.*, 670.

21. Quoted in Lewis Hanke, *Aristotle and the American Indian: A Study in Race Prejudice in the Modern World* (Bloomington: Indiana University Press, 1959), 90.

22. *First Treatise*, par. 9.
23. Name not given. Quoted in Lee Miller, *From the Heart: Voices of the American Indian* (New York: Alfred A. Knoph, 1995), 55.
24. Lebovics, "The Uses of America in Locke's *Second Treatise*," 568.
25. Michael K. Green, "John Locke, Native Americans, and the State of Nature," 1; Arneil, "John Locke, Natural Law and Colonialism," 603.
26. Tully, *An Approach to Political Philosophy*, 146.
27. *Winthrop Papers*, vol. 2 (Boston: Massachusetts Historical Society, 1931), 141.
28. Locke may have been influenced by More's *Utopia*, a work in which Utopians pressed for land are said to be justified in colonizing an area where the natives have a good amount of it left unoccupied and uncultivated. Sir Thomas More, *Utopia* (1516; New York: Penguin Classics, Viking Press, 1965).
29. Preface, *Second Treatise*.
30. Arneil, "John Locke, Natural Law and Colonialism," 601.
31. C.B. Macpherson, *The Political Theory of Possessive Individualism: Hobbes to Locke* (New York: Oxford University Press, 1962), 205–206.
32. Reference to Virginia massacre of 1622. Samuel Purchase, *Hakluytus Posthumus or Purchase His Pilgrimes*, vol. 19 (Glasgow: MacLehose, 1906), 219, quoted in Williams, *The American Indian in Western Legal Thought*, 218.
33. Glausser, "Three Approaches to Locke and the Slave Trade," 208.
34. Tully, *An Approach to Political Philosophy*, 144.
35. H.M. Bracken, "Essence, Accident and Race," *Hermathena* 116 (Winter 1973): 85. See Richard H. Popkin, "The Philosophical Bases of Modern Racism," in *Philosophy and the Civilizing Arts*, ed. Craig Walton and John P. Anton (Athens, OH: Ohio University Press, 1974).
36. M. Seliger, "Locke, Liberalism and Nationalism," in *John Locke: Problems and Perspectives*, ed. John W. Yolton (New York: Cambridge University Press, 1969), 28. Also see Seliger, *The Liberal Politics of John Locke* (London: Allen and Unwin, 1968).
37. Locke was obviously aware of the fact that the practice of taking slaves from Africa could not be justified by just war theory. He nonetheless presents the African slave trade as justified by this theory.
38. Laslett, introduction to the *Two Treatises*, 96.
39. Tully, *An Approach to Political Philosophy*, 144.
40. Felix Cohen, *Handbook of Federal Indian Law* (Albuquerque: University of New Mexico Press, 1942). The *encomienda* system, established in 1512, regarded native people as part of large land grants given to settlers. Natives were enslaved and required to work for the landowner.
41. Tully, *An Approach to Political Philosophy*, 143.
42. Vine Deloria, Jr. and Clifford M. Lytle, *American Indians, American Justice* (Austin: University of Texas Press, 1983), 3.
43. An excellent review of this debate is contained in Hanke's *Aristotle and the American Indian*. Information on the Valladolid dispute was available in English as early as 1603. It was discussed in Purchase, *Hakluytus Post Humus*, a text in Locke's library.

44. *Fundamental Constitutions of Carolina, The Works of John Locke* (1823; Germany: Scientia Verlag Aalen, 1963), 194, article 97.

45. Farr, "So Vile and Miserable an Estate," 285. These laws were never implemented. The trade in slaves was common in the Carolinas. As Tully notes, by 1680 the fur trade and the sale of native slaves to the West Indies were the staples of Carolina's economy.

46. Quoted in Arneil, "John Locke, Natural Law and Colonialism," 603. Letter written in Locke's hand.

47. Tully, *An Approach to Political Philosophy*, 170.

48. Glausser, "Three Approaches to Locke and the Slave Trade," 209.

49. Herman J. Viola, *After Columbus* (New York: Orion, 1990), 74.

50. Green, ed., *Issues in Native American Cultural Identity* (New York: Peter Lang, 1995), 16.

51. *First Treatise*, 42. A more liberal definition of *genocide* specified by the United Nations and legislated in 1988 may place Locke in this context; here *genocide* is defined as the intent to destroy in whole or in part a national, ethnic, racial, or religious group. It is, however, not certain that Locke ever harbored such an intent. For a discussion of genocide and its various definitions, see Steven T. Katz, *The Holocaust in Historical Context* (New York: Oxford University Press, 1994).

52. Salisbury, *Manitou and Providence*, 12.

53. John Dunn, "The Politics of Locke in England and America in the Eighteenth Century," in Yolton, *John Locke: Problems and Perspectives*, 76; John Bulkley, "An Inquiry into the Right of the Aboriginal Natives to the Land in America," in Roger Wolcott, *Poetical Meditations* (London, 1726). Bulkley's treatise is a refutation of Mohegan claims to sovereignty and property.

54. Robert W. Venables, "The Founding Fathers: Choosing to Be Romans," in *Indian Roots of American Democracy*, ed. José Barreiro (New York: Akwe-Kon Press, 1992), 96–97. For an excellent revisionist account of Locke on land and land use, see Kristin Shrader-Frechette, "Locke and Limits on Land Ownership," *Journal of the History of Ideas* 54 (1993): 201–18.

55. In 1871 Congress declared that American Indian tribes were not foreign nations. Treaties were therefore discontinued, although past treaties were not invalidated.

56. John Chester Miller, *The Wolf by the Ears: Thomas Jefferson and Slavery* (New York: Meridian, 1977), 72.

57. Bernard W. Sheehan, *Seeds of Extinction: Jeffersonian Philanthropy and the American Indian* (New York: W.W. Norton & Co., 1973), 169.

58. Quoted in *Native American Testimony*, ed. Peter Nabokov (New York: Viking Press, 1991).

59. Quoted in Miller, *From the Heart: Voices of the American Indian*, 76.

60. Tully, *An Approach to Political Philosophy*, 146.

61. Quoted in James Axtell, *The Invasion Within: The Contest of Cultures in Colonial North America* (New York: Oxford University Press, 1985), 155.

62. Richard Ashcraft, "Faith and Knowledge in Locke's Philosophy," in Yolton, *John Locke: Problems and Perspectives*, 197; Locke, *Essay*, "Epistle to the Reader," 11.

63. Roland Hall, "The Place of Reason in Locke's Essay," *The Locke Newsletter* 23 (1992): 15.
64. Laslett, *Two Treatises*, 97.
65. Harry M. Bracken, *Mind and Language: Essays on Descartes and Chomsky* (Holland and U.S.: Foris Publications, 1984), 57–58.
66. Gordon S. Wood, *The Radicalism of the American Revolution* (New York: Alfred A. Knopf, 1992), 190.
67. Vine Deloria, Jr., *Custer Died for Your Sins* (New York: Avon, 1969), 86–87.
68. Robert Burnette, *The Tortured American* (Prentice-Hall, 1971), 24.
69. Deloria, *Custer Died for Your Sins*, 65.
70. Gregory L. Hill, "Attempts at Genocide," *Turtle Quarterly* 6:1 (1994): 26.
71. Seliger, *The Liberal Politics of John Locke*, 29.
72. Katz, , *The Holocaust in Historical Context*, 137.
73. Josephy, *Now That the Buffalo's Gone* (Norman: University of Oklahoma Press, 1989), 78.
74. Drinnon, *Facing West*, 94. The Cherokee met all of Locke's criteria for ownership of land.
75. Deloria, *Custer*, 174.
76. Stannard, *American Holocaust*, 278.
77. Quoted in Edgar S. Cahn, ed., *Our Brother's Keeper* (New York: New Community Press, 1970), 69.
78. Glausser, "Three Approaches to Locke and the Slave Trade," 215–16.
79. Ashcraft, "Exclusive and Inclusive Theories of Property Rights: A Rejoinder to Horne," in *Critical Review* 8:3 (Summer 1994): 439.
80. Tully, *An Approach to Political Philosophy*, 176.
81. Deloria, *We Talk, You Listen* (New York: Dell Publishing Co., 1970), 83–84.