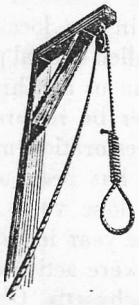
A Farmer Halts the Hangman: The Story of Marvin Bovee

by Elwood R. McIntyre



"From the newspaper accounts of every execution, I learned how Mr. So and So and Mr. Somebody Else and Mr. So On shook hands with the culprit. But I never find them shaking hands with the hangman. All kinds of attention and consideration are lavished on the one, but the other is universally avoided like a pestilence. Is it because the hangman executes a law which all men instinctively abhor?" —*Charles Dickens.*[1]

A SINGLE TERM in the legislature of 1853, as leader of a hard-fought but successful drive to abolish capital punishment in Wisconsin, turned Senator Marvin H. Bovee, Waukesha County farmer, into a zealous and resourceful penal reformer. Brought suddenly into prominence, his aid was sought in many antigallows campaigns across the nation during the ensuing thirty-five years. At times he was praised and victorious; often he was derided in defeat.

Bovee's heritage foreshadowed his life of public usefulness. His parents, both natives of New Amsterdam, New York, where Marvin Bovee was born on January 5, 1827, had sympathetic association with Quakers and Unitarians. The father, Matthias J. Bovee, a Jacksonian Democrat with a flair for progressive liberalism, was elected to the New York state assembly in 1826, and ten years later, at the age of thirty-four, was elected to Congress as a Democratic Representative from New York. He served in the 25th Congress, and when the second session opened in 1836, Speaker Polk put him on the Committee of the Whole on Expenditures of the War Department.[2] To his mother Marvin gave credit for a happy childhood in which she "taught me to hate nothing but injustice and cruelty."[3]

Marvin's youthful plans to enter Union College at Schenectady, New York, were abandoned when the family of eleven persons moved to Wisconsin Territory in 1843. They settled on a farm in Eagle township, Waukesha County, where Matthias acquired over a thousand acres of land, some of which he turned over to his children.[4] The Eagle township census of seven years later shows Marvin and his five brothers and three sisters living with their parents on a prosperous forty-acre farm valued at $6,000, having machinery worth $250, two teams of horses, a yoke of oxen, a dozen milch cows, forty hogs, and a flock of sheep. In that year, 1850, Eagle township had 125 farms, with only twenty of them valued at more than $3,000. The Bovees' close neighbors were the Pittmans, Spragues, Hinkleys, and Thomases.

Waukesha County was a hotbed of anti-slavery sentiment and advanced political ideas, and in their new home the Bovees took a keen interest in school and lodge affairs as well as politics. The organization of School District No. 9 at Eagle Center, December 6, 1846, found Matthias, his son William, and his brother Phillip taking part. His son Marvin taught school for four winter terms in the vicinity. Father and son were charter members of Robert Morris Lodge, F. & A.M., of Eagle Center, and together joined the Democratic "Granite Club."

Apparently the elder Bovee never held public office in Wisconsin. He tried, however, to contest the seat of Charles Burchard as a constitutional convention delegate in 1846. His claims of miscounted votes and expense bills were rejected by the credentials committee.

[1] *London Daily News*, March 14, 1846.
[2] *Biographical Dictionary of the American Congress* (Washington, 1950), 179; *Register of Debates in Congress* (Gales & Seaton, Washington, 1836), 12:1.941.
[3] Marvin H. Bovee, *Christ and the Gallows; or, Reasons for the Abolition of Capital Punishment* (New York, 1870), iii.
[4] James F. Bovee, Eagle, Wisconsin, to the author, October 16, 1956.

were acquainted, and immediately teamed up to support antigallows legislation.[11]

Friends of repeal faced the strong reluctance of a raw, pioneer society to abandon swift and deadly justice for major crimes. Above all, Bovee and co-workers knew that all previous attempts to modify the state's criminal penalty code had failed, both before and after statehood.

Antigallows members could count on Assemblyman Sholes and his *Kenosha Telegraph;* W. D. Barron and the *Waukesha Democrat;* Beriah Brown and the *Wisconsin Argus* of Madison; and probably the Milwaukee *Daily Free Democrat.* Opposition would come from, among others, the *Milwaukee Sentinel* and the Elkhorn *Star.* Sholes had been against capital punishment since he reported the last public execution in Wisconsin—that of John McCaffaray, before 2,000 persons, for drowning his wife at Kenosha in 1850. But Beriah Brown of the *Wisconsin Argus* took a dim view of state murder exhibitions, even in private. Writing in the November 16, 1852 issue of the *Argus,* he said: "The law is to be avenged next Monday at Milwaukee on the persons of McDonald and Connaughty, convicted of murder. The execution is to be strictly a private affair in the presence of a few people who like that kind of amusement, General King of *The Milwaukee Sentinel* and the orthodox clergy included. Two of God's images are to be choked to death with the greatest of propriety." (There was no hanging party, however, because of a last-minute stay of execution.)

Bovee knew that during the first constitutional convention Elijah Steele of Kenosha, a fellow New Yorker, had failed in pressing for passage of Article 20, which read: "Resolved, that taking human life by hanging or otherwise shall never be the mode of criminal punishment." Colleagues who signed the report were James Duane Doty, Winnebago County; David Bowen, Green County; and Warren Chase, Kenosha, one of the Wisconsin Phalanx founders. When the proposal was killed on third reading, Attorney Edward G. Ryan, later chief justice of the state supreme court, said in part: "This question should be submitted to popular vote. Friends of the old Mosaic Law should be told that a better covenant has been given to fallen man, one in which mercy and justice are blended." The 1849 statutes, compiled after statehood, prescribed death for first degree murder, but provided a life term for mortally wounding another in a duel. Thus, duelists fared better than ordinary murderers.[12]

As shining examples of states enjoying enlightened legislation, Bovee and his colleagues pointed to Michigan and Rhode Island. Michigan abolished the hangman in 1846, effective in 1847; Rhode Island followed suit in 1852. Michigan had failed to outlaw hanging in its constitutional convention and also in the sessions of 1835 and 1843. But the 1847 statute changed the penalty from hanging to life in solitary confinement at hard labor—somewhat harsher than the statute Wisconsin was to enact.[13]

Proponents of repeal cited recent cases to prove that penalty for the guilty could be avoided entirely when the jury knew that a life was at stake. W. D. Radcliffe, at his trial in Milwaukee in 1852, admitted he killed a drinking companion, but his confession was ruled out. Thereupon the jury refused to convict for first-degree murder because the evidence was only circumstantial. Judge Levi Hubbell, in dismissing the jury, said, "May God have mercy on your consciences!"[14]

In Waukesha County in the early 1850's, William Flannaghan shot Francis Horel, who lived long enough to accuse his assailant in court; yet Judge Hubbell sent the prisoner to Waupun for only five years on a second-degree murder charge. Hugh Drum killed his own

[11] *Waukesha Democrat,* October 11, 1852; Franklyn Curtiss-Wedge, *History of Buffalo and Pepin Counties* (Winona, Minnesota, 1919), 594-595. Lees later moved to Buffalo County where he served as district attorney from 1859–1867 and from 1871 to 1874. In 1875–1876 he was again a member of the state assembly.

[12] Milo M. Quaife, ed., *The Struggle Over Ratification; vol. 28, Collections of the State Historical Society of Wisconsin: Constitutional Series, vol. 3* (Madison, 1920), 131–132; Wisconsin Legislative Reference Library, *Capital Punishment in Wisconsin* (Brief no. 32, November, 1955. Mimeographed.)

[13] *Michigan Revised Statutes of 1846.* chap. 153, p. 658; Michigan Legislative Reference Library, *History of Capital Punishment in Michigan* (Lansing, n.d.). In 1931 a Michigan referendum on the restoration of the death penalty for murder was defeated by a vote of 324,594 to 269,538. No similar referendum has ever been held in Wisconsin.

[14] Wisconsin Legislative Reference Library, *op. cit.*

mother, but the jury refused to give him the rope, and set him free because of "extreme youth."[15]

Bovee's repealer bill was introduced in the assembly by Lees as No. 67-A. The special committee headed by Lees sent in a favorable report on January 27. The assembly laid it on the table, but on February 28, George W. Cate of Portage and Marathon Counties moved to take it up and the motion was sustained. On March 4 it was ordered engrossed and read a third time, and on March 9 it passed, 36 to 28. At least eight members did not vote on the final ballot, which number constituted the exact majority the bill received. Among its foes were Speaker Henry T. Palmer and his Milwaukee colleagues Chase, West, and Tweedy, along with Roche, Burns, and Burdick of Dane; Davidson, Donaldson, Loehr, and Tallmadge of Fond du Lac; Reed of Waukesha; and Coleman and Taylor of Sheboygan.

Then Bovee's own Select Committee to Whom is Referred a Bill to Abolish Capital Punishment recommended the assembly bill for senate concurrence. Senator J. T. Lewis, still another native of New York state, signed the report with Bovee. Lewis had belonged to the first constitutional convention, had served in the assembly, was later senator from the Twenty-fifth District, and in 1864–1865 became one of the state's war governors. Another senator destined for the governor's chair who endorsed the Bovee bill was Coles Bashford of the Twenty-first District. The committee report argued that the right of any small group to make a compact to punish by death was questionable conduct; therefore, any such compact made by as many as 50,000 or more persons was equally a violation of right and justice.

On July 8, the senate passed the bill by 14 to 9, and two days later Governor Leonard Farwell signed the measure as Chapter 103, Laws of 1853, making life imprisonment the extreme penalty for first degree murder, and abolishing the death sentence.[16]

HOWEVER, many Wisconsin settlers were not ready for such a broad step. The choice of many citizens would have been a law providing a jury option between death or prison penalty. Subsequently two notorious lynchings at Janesville and West Bend were blamed on the new law, which, it was claimed, made mob action more likely to happen.[17]

Actually, aside from military cases, only four legal hangings for murder are recorded in Wisconsin courts from 1836 through 1852. Two Indians were hanged, one at Portage for the killing of Pierre Pacquette, famous fur trader, and another for the murder of Ellsworth Burnett, Milwaukee land developer. At Lancaster, Judge Dunn sentenced Edward Oliver to death in October 1838, for slaying John Russell at Cassville. The McCaffaray affair was the last death sentence in the state prior to the McDonald and Connaughty conviction wherein the penalty was indefinitely postponed on legal technicalities.[18]

Wisconsin's new law to nullify the noose attracted wide attention and comment, pro and con. On July 23, 1853, Horace Greeley's *New York Tribune* gave much credit and praise to Bovee for enactment of the law. Papers not favorable had to report it anyhow.

In the winter of 1857 an attempt was made to repeal the law of 1853. Would the Republican majority this time toss out the "Bovee law" which the Democratic majority enacted? Interest ran high and at the Waukesha lyceum debaters took sides on the question. Although no longer a legislator, Bovee did his utmost. J. A. Leonard in the *Waukesha Republican* asked for a longer test of the new law to give it a fair trial. His advice prevailed. Nevertheless, Senator E. Fox Cook, First District, put in a bill to repeal the abolition law which went to Joel Barber's judiciary committee. Barber, former partner of Governor Nelson Dewey, was a foe of the rope. He held the Cook bill without action until it was indefinitely postponed.[19]

[15] *History of Waukesha County* (Chicago, 1880), 553–555.

[16] See Wisconsin Legislature, *Senate Journal* and *Assembly Journal*, January–July, 1852.

[17] David Mayberry, lynched at Janesville, July 12, 1855, after having been sentenced for life by Judge Doolittle for the murder of Andrew Algar; George DeBar, lynched at West Bend, August 7, 1855, for assaulting a farmer and killing a hired boy.

[18] Circuit Court, Lancaster, Wisconsin Territory, *Record Book* (September, 1838), 123; Carrie Cropley, "The Case of John McCaffaray," in the *Wisconsin Magazine of History*, 35:281–288 (Summer, 1952); Moses M. Strong, *History of the Territory of Wisconsin* (Madison, 1885), 249–250.

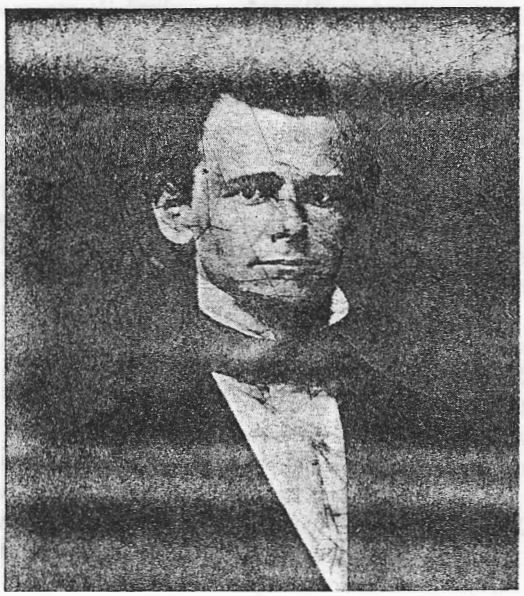
[19] Wisconsin Legislature, *Senate Journal, 1857*, p. 114.

For five years after this legislative success, Bovee, who never ran for the senate again, confined his activities to farming and corresponding with prominent sympathizers of penal reform. But the winter of 1858–1859 saw him on the stump in Illinois, crusading against the hangman at special meetings arranged by sponsors. The only net result was enactment of a law in 1859 which did away with public executions. Making hangings private affairs was often used as an entering wedge for taking more sweeping action.[20]

In 1858, Greeley in his difficult script, wrote Bovee to ask what the effect of the Wisconsin repeal law had been, and in another letter, written in 1860, he said that in New York no serious attempt would be likely to abolish death for murder, although he had been against it all the years he had run a newspaper. Horatio Seymour wrote that he favored softening the criminal code when guilt was proven, so as to get more certainty of conviction. He said that two of the worst questions facing legislators were the handling of paupers and criminals.[21]

IN 1859–1860, during a canvass that lasted almost five months, Bovee made more than a hundred talks in his native state of New York. His last talk was before the select committee of the state assembly at Albany, which unanimously reported an outright abolition bill. It passed the assembly by eighteen votes, but a compromise was necessary before the senate would accept it. This compromise law sent a murderer to state prison for one year, after which he might be executed if and when the governor saw fit to issue his warrant. In substance, this was the old Maine law of 1836, regarded by its sponsors as a virtual abolition, since they felt that few governors would order the extreme penalty after such a "cooling off" period.

But a rude upset followed. Bovee and zealous friends had asked Governor Morgan of New York to grant respite to a convicted murderess, Mrs. Hartung of Albany, sentenced for poisoning her husband. The respite of sentence granted by the governor carried her past the date when the new state law became effective, whereupon her shrewd attorneys got her off entirely by order of the court of appeals and the supreme court of New York. The court ruled that in her case the new law was void, since it provided a different and extra



Marvin Henry Bovee, from an undated ambrotype in possession of his grandson, Kenneth B. Halverson, Pasadena, California.

prison term of one year more than was in force when her crime occurred. It also pointed out that the section defining hanging had been repealed, with no new mode of execution named for first-degree murder.[22]

[20] "Sketch of the Life of Hon. M. H. Bovee," *Whitewater News*, October 15, 1887.

[21] Greeley to Bovee, November 12, 1858 and April 9, 1860, in the Bovee Papers, Huntington Library, San Marino, California. Copies of this and subsequently quoted letters are available on microfilm in the Society's Manuscripts Section.

[22] Chapter 499 of the New York laws of 1888 produced another similar error. The legislature intended to abolish hanging as of June 4 that year and substitute electrocution on January 1, 1889. Convicted persons were to be kept in prison until the electric chair was ready. The act provided that no one was to be hanged after June 4 and that electrocution was to begin on the first day of the following year. But the law went on to say that electrocution "shall apply to all convictions for crimes punishable by death on or after that date." Hence, the state had deprived itself of the legal power to execute anyone who killed with malice aforethought during the term of almost seven months. The matter was taken to the higher courts at once and they gave the necessary opinions that saved the situation. See court records or refer to Richard H. Rover, *Howe & Hummell* (New York, 1947), 74–75.

them said that he wanted hanging restored so as to work up more sentiment for executing the Confederate leader. Bovee reminded this zealot that there was no connection whatever between the fate of Mr. Davis and the state penal code, and in the heat of the furor, went to Madison and addressed the legislature. Discovering that the heaviest pressure for repeal was in the senate, where such a bill had been introduced by Littlejohn of the Twelfth, Bovee had a bill to restore the death penalty put into the assembly where it was defeated overwhelmingly—a maneuver that made the senate hesitant to proceed further. As a result, the Littlejohn bill was tabled.

In the winter of 1867, opponents of capital punishment in Illinois called for Bovee's help in changing the state's penal law. He gave Chicago talks at Crosby's opera house, Bryant & Stratton Commercial College, and at St. Paul's Church, winding up his Illinois campaign with a talk before the legislature at Springfield. Subsequently, an abolition bill passed both houses just as Bovee had drafted it, and became law. It gave the jury the right to fix either the death penalty, not under fourteen years' imprisonment, or life imprisonment, for first-degree murder. This was the law under which the Chicago anarchists of the Haymarket riot of 1886 were tried. Four were executed and three received a life sentence, and were later pardoned by Governor Altgeld.[29]

Bovee's Illinois success moved Governor Marshall and other Minnesota officials to seek his aid in promoting a similar law in that state. Gerrit Smith, Bovee's famous New York collaborator, sent him fifty dollars "toward that Minnesota campaign." But a less pleasing note came from Matt Carpenter, later U. S. Senator. Writing from Milwaukee, Carpenter said: "I wish you every success, *except* in accomplishing the object of it. There are [some] who were doubtless born to be hanged, and it is setting up against fate to prevent their natural destiny."[30]

In February, 1868, Governor Marshall introduced Bovee to a joint session of the Minnesota legislature. By March 6, it had passed a standard jury option law, and it was under this statute that the notorious highwaymen, the Younger brothers, escaped execution and were sent to the state prison at Stillwater.

Bovee was noted for generosity in spending his own time and funds in his campaigns. Yet the *St. Paul Dispatch*, a Republican organ, rapped him. Quoting the *New York Tribune's* praise for Bovee's success in Minnesota and Greeley's expressed hope to welcome Bovee for more crusades in New York, the *Dispatch* said: "If the *Tribune* really wants to abolish hanging, it should ask Mr. Bovee to stay at home. He is an interminable old bore. The man in the moon had as much influence on our legislature as he did. If he had arrived two weeks sooner, the bill would have been defeated."[31]

Next Bovee went to Pennsylvania at the behest of Quakers and the antigallows societies so active there. Here the restless reformer made eighty public talks, mostly at his own expense, in the winter of 1869–1870. He wound up with a talk before the legislature at Harrisburg. The judiciary committee unanimously favored a jury option bill, but there was a continuous delaying action made by opposing forces. By many parliamentary tricks and subterfuge, they managed to halt its passage to the date of adjournment.

More successful in Iowa, Bovee in 1872 addressed the legislature, with Governor Carpenter in the chair. There was little difficulty. Bovee's suggested bill to revoke the death sentence entirely passed both houses and was in force for four years, until in 1876 Iowa enacted a jury option law such as Minnesota's, since which time death has not been mandatory.

Indiana, possessing a number of outstanding antigallows societies, was anxious to enact a strong law against the death penalty. At Governor Hendricks' request, Bovee was asked to address the state legislature, which he did, although the governor, incapacitated by an accidental fall, was not present to hear him. Among the legislators the issue was touch and go, and when an antigallows bill which had been recommended for passage was voted on in the House there was a tie, broken by Speaker Edwards of Terre Haute who voted

[29] *Whitewater News*, October 15, 1887.

[30] Carpenter to Bovee, January 11, 1867, in the Bovee Papers, Huntington Library.

[31] *St. Paul Dispatch*, March 24, 1868.

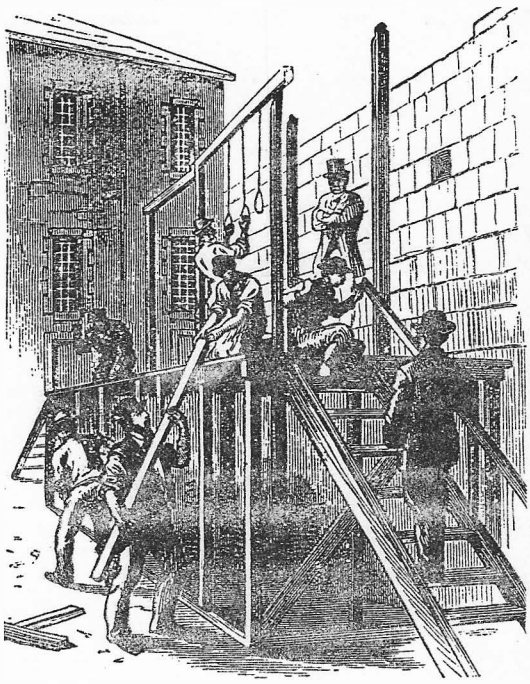
against it. Seeing small chance of the bill's revival in another form, Bovee returned to Wisconsin.[32]

WHEN BOVEE had first begun on his penal reform book, New York relatives had offered him help. C. W. Bovee, a cousin, suggested that great care be used in style and subject matter and offered to get antigallows opinions for inclusion in it from his friends at the Athenian Club, including such men as William Cullen Bryant, Ralph Waldo Emerson, and Thomas Eubank. An uncle, J. Bovee Dod, sent cordial offers to read proof. "Doctor" Dod was an electromagnetic healer and the dispenser of "Imperial Wine Bitters," a medical remedy for numerous ills.[33]

Bovee's book, called *Christ and the Gallows; or, Reasons for the Abolition of Capital Punishment*, appeared in 1870, with a second edition entitled simply *Reasons for Abolishing Capital Punishment* appearing in 1879. Both were dedicated to his mother and both were published by himself on a subscription basis.

In the course of soliciting statements and subscriptions for his book, Bovee corresponded with many of the nation's most distinguished men. At the outbreak of the Civil War and later in the 1870's, when he proposed more efforts to abolish hanging and also espoused prison reform, Bovee received occasional lukewarm replies from his Eastern friends, and his correspondence reflects some of these mixed sentiments.

Reverend H. W. Bellows wrote that the War had blunted feelings as to the value of human life, and said that New York had worse things than the gibbet to overcome. "Our city is in the hands of ruffians armed at all points. It seems impossible for us to escape their wholesale plunder. Can we think of the gibbet when such a crucifixion of law and liberty is happening in our midst?" Obviously referring to the Tweed Ring, Bellows concluded, "If you have the courage to get a hearing for your cause in this Godforsaken community, you will do better than I fear." In another letter, Bellows advised Bovee that it would be wise to trim the ship with a little "conservative ballast." He expressed alarm lest Bovee rely too exclusively on men of extreme opinions and rash expressions, saying that he never expected candor and wisdom from partisan extremists. As he put it, "Our reformers generally lose their feet, through the lightness of their heads." Yet he felt confident that Bovee was well qualified for public usefulness if he did not become too carried away.[34]



Scaffold being erected for the hanging of the Molly McGuires in the Pottsville, Pennsylvania, jailyard, from Leslie's Illustrated Weekly Newspaper, *July 7, 1877.*

Promising aid to Bovee's crusade through the *Evening Post*, William Cullen Bryant wrote in 1867 to say that when the reconstruction question was settled in the South there would be more time for other controversial matters. Horace Greeley, writing in June, 1869, called Bovee "Old Fellow" and said that if he had fifty dollars to spare Bovee would get it. Greeley also refused to insure in a co-operative life insurance concern in which Bovee must have had some interest. "I decline," he wrote.

[32] *Whitewater News, loc. cit.*

[33] J. Bovee Dod to Bovee, October 31, 1860, in the Bovee Papers, Huntington Library.

[34] Bellows to Bovee, July 27, 1860, February 15, and November 18, 1868, in the Bovee Papers, Huntington Library.

"I have more invested now in life insurance than I want. I shall be richer dead than alive." Subsequent letters from Greeley relate to political matters and in one letter he addressed Bovee as "You Enormous Blockhead" for differing on some points involved. Oliver Wendell Holmes refused to contribute but sent his best wishes; a "modest contribution" came from the poet Longfellow; J. G. Holland, a Massachusetts author, offered to trade a copy of his novel *Gold Foil* for a copy of *Christ and the Gallows*. Francis E. Spinner of the federal treasury office enclosed a trifle "but not to help rogues escape the gallows." Some comfort came from Elizabeth Cady Stanton who in a long letter offered to testify with Bovee before the New York legislature.

In May of 1869 Senator Charles Sumner sent six dollars for Bovee's publication and reform fund. But possibly Bovee overestimated the situation, for a year later in another letter Sumner stated: "You ask for a donation of $100 from the Massachusetts delegation. I know nobody in the membership who agrees with me against capital punishment. Hence the sum you want must come entirely from me. I cannot afford it." John Greenleaf Whittier sent ten dollars because "I know thy work and labor of love," and hoped to see Bovee when he again came East. Concerning Bovee's zeal as a Democratic party worker—he made scores of talks during Cleveland's first campaign—Fred O'Connell, a Dubuque attorney and Iowa Democrat wrote, "You are the most irrepressible campaigner I ever knew."

Bovee sought letters of introduction everywhere. One, furnished him by Whitelaw Reid, New York editor and Greeley's onetime partner, addressed to Murat Halstead, of the *Cincinnati Commercial*, read: "This will be handed to you by Marvin H. Bovee, noted opponent of capital punishment. He is as consistent and straightforward a reformer as I have ever met. He may invade Ohio, so you should know him."[35]

In 1869 Bovee was given an honorary membership in the Howard Association of London, a well-endowed research and propaganda society engaged in social reform and opposed to capital punishment. William Tallack, the association's secretary, had some of the letters which he received from Bovee published in the London papers. It seems that literature from Tallack may have given Bovee an idea that there might be an opportunity abroad for him to campaign on the capital punishment issue—providing his expenses were paid. Among others, Senator Sumner was queried on this point. Sumner replied that although there was much interest in England in penal reform, he did not know whether anyone who expected compensation would find either a welcome or a field of operations there.[36]

In the first copies of *Christ and the Gallows*, Bovee used a critical opinion sent him by Dr. George B. Cheever, a New York cleric known to be violently opposed to both slavery and the abolition of the death penalty.[37] In this opposition to the latter, the Bible was the mainstay in Cheever's writings, especially such verses as Genesis ix, 6, "Whoso sheddeth man's blood, by man shall his blood be shed," and Deuteronomy xix, 21, "Eye for eye, tooth for tooth, hand for hand, foot for foot." In 1846 Cheever had written a book, *Punishment by Death; Its Authority and Expediency*, dedicated to the New York legislature. In it he and a Dr. Cox of Brooklyn proposed that hanging be abolished in favor of decapitation since "that is the more honorable and less painful method." Their idea was that "righteous punishment should be inflicted with compassion."

In his letters Cheever asked Bovee what authority he could name to set aside the teachings of Moses and Paul, "inspired communicators of God's will." For answer Bovee could point to the last two chapters of his book in which he took the position that Christ's suffering in behalf of humanity had completely reversed the old Mosaic law of meeting evil with evil. In proof he offered many quotes from the New Testament, just as Judge Edward G. Ryan of the state supreme court had done years ago at the time of the first constitutional convention, as for example, "Forgive and ye shall be forgiven," "Love your enemies, bless them that curse you, do good unto them that hate you, and pray for them that despitefully use you. . . ."

[35] From letters in the Bovee Papers, in the Huntington Library.

[36] A series of undated letters to Bovee from Tallack; Sumner to Bovee, February 6, 1865, all in the Bovee Papers, Huntington Library.

[37] Bovee, *Christ and the Gallows*, 299.