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# Neither Single nor Alone: Elizabeth Cellier, Catholic Community, and Transformations of Catholic Women's Piety

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Elizabeth Cellier, known infamously as the “Popish Midwife,” burst into the historical and literary record during one of the most dramatic decades in English history, between the Popish Plot and the Glorious Revolution. From 1678 to 1688, Cellier publicly accused the government of torturing prisoners, submitted articles to Parliament, wrote a small book and three smaller pamphlets or proposals, served as midwife to Mary of Modena, wife of James II, and proposed the creation of an innovative royal foundling hospital and college of midwives. She also was tried and acquitted of treason, tried and convicted of libel, fined £1000, imprisoned in Newgate, and pilloried, at which time onlookers pelted her with stones and other missiles. “Singl[e] and Alone,” she described herself in these troubles.<sup>1</sup> Following the Glorious Revolution, she disappeared from the historical record as suddenly as she had appeared a decade earlier. During one turbulent decade, however, Cellier was so well known that critics paraded an effigy of her through the streets as part of an anti-papal procession, indicating the extent to which contemporaries viewed her through the lens of her Catholicism and feared the threat her religious loyalties might pose.<sup>2</sup>

Modern researchers recently have rediscovered Cellier's texts. Scholars such as Mihoko Suzuki, Helen King, Frances E. Dolan, and Penny Richards have investigated Cellier's interest in and impact on political developments, her championing of more formalized training of English midwives, her gendered self-representation through her writings on both these issues, and the intersections between religion and gender in published responses from her critics.<sup>3</sup> Valuable as these approaches have been, seldom is Cellier's understanding of herself as a Catholic woman explored in depth. Moreover, little attempt has been made to use Cellier to provide a window into larger Catholic communities in London or the evolving roles of Catholic women as writers, activists, and exemplars within these communities.<sup>4</sup>

Through an investigation of three of Cellier's texts, *Malice Defeated: Or a Brief Relation of the Accusation and Deliverance of Elizabeth Cellier* (1680), *A Scheme for the Foundation of a Royal Hospital* (1687), and *To Dr.— An Answer to his Queries, concerning the Colledg of Midwives* (1687), this study

integrates the missing element of Catholicism into our interpretation of Cellier's activism and writings.<sup>5</sup> First, I argue that Cellier's understanding of her faith and women's roles within Catholicism motivated her to act boldly when faced with mistreatment of her fellow Catholics. Second, her participation within networks of English Catholics provided her with the means to act. Finally, her Catholicism provided templates for the actions she chose to take. Catholicism shaped her efforts by providing acceptable models for good works in the forms of prison relief and the organization of women's institutions. Cellier then accommodated these models to best meet her needs in the changing political, religious, and gendered environment of late seventeenth-century England. In sum, Cellier was neither single nor alone, as she understood herself, but operated within Roman Catholic traditions and networks.

While scholars are increasingly recovering the contributions of women within English Catholic history and literature, analysis tends to focus on the stories of recusant women heroically refusing to attend Church of England services and fostering a household-based Catholicism patterned after fairly traditional models of women's sanctity.<sup>6</sup> As I have argued elsewhere, religious understanding, practice, and lived experience evolve as the environment in which a religion is practiced alters.<sup>7</sup> We need to look beyond our expectations of finding women filling traditional roles to discover unanticipated evolutions in how women participated in their faith, transforming traditional practices for women within Catholicism into new forms, with new messages, to adapt to changing circumstances.

Similarly, as is well recognized, the period of the English Civil War, during which Cellier was born, witnessed an explosion in the quantity, validity, and legitimacy of women's writing and publishing along with women's involvement in the public sphere through political actions such as petitioning or rioting.<sup>8</sup> Discussions of the Civil War, Interregnum, Restoration, and Glorious Revolution frequently consider the initial expansion and subsequent contraction or evolution in women's roles as tied to these activities.<sup>9</sup> Protestant women's voices figure prominently in such discussions. Catholic women's voices, however, seldom appear. When a Catholic woman's writings or activities are included, scholars typically identify the woman as a Catholic but do not analyze her contributions through the lens of Catholicism, except in terms of what Catholicism meant to the woman's critics.

Cellier manifests elements of both developments. She practiced recusancy but not necessarily as part of a household-based, manor house Catholicism. She was a London professional married to a foreigner. Building on the lessons women of all faiths were learning about activism, writing, and publishing, she transformed traditional women's Catholic practices involving good works and the organization of women's insti-

tutions into new forms that wove religious, political, and professional engagement together. She accomplished this in an ever-changing environment in which the overt practice of Catholicism was officially illegal but increasingly tolerated by a sympathetic monarchy if not by the majority of subjects.

*Motivation: Cellier's Understanding of Her Faith*

Elizabeth Cellier first appears in the historical record relative to the fictitious Popish Plot of 1678—in which Titus Oates accused English Catholics of conspiring to murder Charles II in order to put his Catholic brother James, Duke of York, on the throne—and due to her involvement in the equally fabricated Meal-Tub Plot of 1679—in which a small group of English Catholics forged evidence of a Presbyterian plot to overthrow the Stuart monarchy.<sup>10</sup> The Meal-Tub plotters were betrayed by one of their own, Thomas Dangerfield, before they could plant evidence on their enemies, and the authorities found the false documents in a tub of meal in Cellier's home. Cellier was arrested in October 1679 and charged with high treason. During her trial in June 1680, she mounted a spirited defense and was acquitted.<sup>11</sup> Shortly following her release, she wrote and self-published *Malice Defeated* in which she related her version of her activities leading up to and including the Meal-Tub Plot and her trial. In it, she maintains that the government allowed Catholic prisoners to be tortured in Newgate prison, in violation of English law, and that officials bribed prisoners to perjure themselves to corroborate the existence of the Popish Plot. Shortly after the pamphlet's release, officials arrested and tried her for libel.<sup>12</sup> Found guilty, Cellier was fined £1000, imprisoned until she could pay, and sentenced to three sessions in the pillory.<sup>13</sup>

Contemporaries and modern scholars typically identify Cellier as the “Popish Midwife,” an epithet created by her critics that highlights her faith and profession, both of which were viewed with suspicion in seventeenth-century England. “Popish” was an anti-Catholic slur, a hostile term. Applied to a person, it implied a treasonous allegiance to the Pope rather than to the English sovereign. Similarly, midwives had a scandalous reputation. Negative images of them as prone to drunkenness, sorcery, and loose sexual morals were widespread (King, pp. 118-19). Cellier's being so labeled meant her contemporaries could discredit her criticisms of political developments, her allegations of torture within the prison system, and her midwifery with pamphlets bearing inflammatory titles such as *The Scarlet Beast Stripped Naked, Being the Mystery of the Meal-Tub the second time Unravell'd; Or a Brief Answer To the Popish-Midwives scandalous Narrative, Intituled Mallice defeated*, which managed to discredit Cellier's political, religious, and professional affiliations while simultaneously invoking female sexual immorality and the end of days.<sup>14</sup>

For Cellier, however, religious affiliation and political attitudes were inseparable parts of her own positive Catholic identity. By understanding how she viewed her faith, we come closer to understanding her motivation for involving herself in politics. She opened *Malice Defeated* by describing her conversion to Catholicism following her Protestant upbringing. She witnessed her family's suffering during the Civil War because of their loyalty to the monarchy, and she adamantly opposed the beheading of Charles I. Cellier related how these events inspired her to investigate and eventually adopt the Roman faith (p. 1). Political events may have led to her conversion, but they were also deeply woven into her understanding of faith traditions and how one lived one's life as a subject of the monarchy. She found her "Innate Loyalty" to her sovereign confirmed within Catholicism (p. 1). Never, she claimed, had she encountered or heard of any Catholic who would not lay down his or her life in defense of the king. Even when Cellier recounted her actions in the Meal-Tub Plot, she did so by framing it through her desire as a Catholic to help her king (pp. 14, 23).

In her prose, "Cellier's personality seems to leap off the page," according to Rachel Weil, in large part through her pride in being Catholic and her dismay at what she perceives to be the spread of prejudice against and fear of Catholics in the religio-political upheavals of her day.<sup>15</sup> To make someone odious, all one had to do was call the person a "Papist and Idolator," Cellier fumed in *Malice Defeated* (p. 1). She claimed this was what happened during the Civil War when Catholic slurs against Charles I and his associates were used to legitimate his murder (p. 1). She also asserted that the Popish Plot was another example of Catholics being set up by Presbyterians (pp. 2, 28, 29). However dubious reports of a Catholic plot against the Protestant king were, such rumors fell on sympathetic ears in the late 1670s. The authorities questioned and arrested Catholics, including five of high rank on suspicion of treason. Cellier herself was assaulted and gravely injured during the year of the Popish Plot, although it is unclear whether the attack was religiously motivated.<sup>16</sup>

#### *Means: Cellier's Connections to Communities of Catholics*

Understanding Cellier's actions and writings requires attending to the extensive networks that bound together and assisted the Catholics of seventeenth-century England. The four identifiable networks in which she participated are those involving foreigners, merchants, prisoners, and the circulation of casuistry texts. In particular, foreign Catholics regularly aided England's Catholics, connecting Cellier with religiously and politically active networks of both English and foreign Catholics. These communities and webs of personal contact, which themselves overlapped each other, provided her with the means to put her faith into bold action.

Cellier alluded to her involvement with such networks in her testimony during her first trial, which she chronicled in *Malice Defeated*. Her accusers questioned her about harboring “St Omers Youths,” young English seminary students from the English College at St. Omer in France (p. 16). Conceding this point, Cellier asserted that since the young men had come over at the king’s request to testify on behalf of Jesuits accused of the Popish Plot, it had been legal for her to harbor them, despite laws against attending Catholic seminary abroad and aiding Catholic priests (p. 16). How was Cellier, who testified that she had never been outside England, connected to communities of seminarians in St. Omer and to Catholics residing abroad? Why did she, of all London Catholics, house critical Catholic witnesses from St. Omer?<sup>17</sup>

At the time of her interest in the Popish Plot and involvement in the Meal-Tub Plot, she was married to Peter Cellier, a French Catholic merchant living in London. Elizabeth’s association with the French Catholic community in London provided her with opportunities to hear Mass regularly, receive the Catholic sacraments, enjoy access to Catholic texts, and witness the visible, regular practice of Catholic community and identity. For example, diplomatic privilege allowed foreign embassies to maintain Catholic priests, chapels, and rituals for their own use. The French embassy, among others, was known for welcoming English Catholics to Masses held at the ambassador’s residence in London. Well-placed foreign Catholics often interceded with Protestant authorities on behalf of English Catholics accused under the penal laws. They monetarily supported their coreligionists. English priests could keep in contact with their superiors abroad through the embassy priests (McClain, pp. 161-70).

Peter’s occupation as a merchant allowed Elizabeth additional opportunities to participate in a variety of Catholic networks. Both English and foreign Catholic merchants used the day-to-day operations of their businesses to circulate information, individuals, and objects among Catholics within London, throughout England, and abroad. Merchants could receive deliveries, and large numbers of diverse persons could come and go from a merchant’s place of business without undue suspicion. Messages were delivered; Catholic items were sold to a select clientele on the black market; and Catholic texts were circulated. Moreover, many merchants, especially foreign ones such as Peter, were expected to have international contacts and correspondents, even within Catholic countries. English Catholics used merchants to keep in touch with friends and relatives who had immigrated to the Continent, joined English monasteries based on the Continent, or studied at one of the many English Catholic seminaries (McClain, pp. 158-60).

That Elizabeth considered herself part of the French Catholic and merchant communities and relied on these connections is evident from her

description of a conversation she had with the Whig sheriff, Sir William Waller. As Waller searched her home for evidence of her involvement in the Meal-Tub Plot, he asked her whether she would be willing to take the Oaths of Supremacy and Allegiance to prove her loyalty to the crown. According to Cellier, in *Malice Defeated*, she responded:

Have you any Authority to offer them to me? I suppose you have none except here were another Justice present; but if there were, I am a Forreign Merchants Wife, and my Husband, both by the General Law of Nations, and those of this Kingdom, ought to remain unmolested both in his Liberty and Property, till a breach happen between the two Crowns, and the King hath declared as much in his Royal Proclamation, and if you violate the Priviledges my Husband ought to have as a Merchant-stranger, the King of France, whose Subject my Husband is, has an Ambassador here, by whom we will complain to His Majesty, and I hope we shall obtain Redress. (p. 17)

Cellier's response provides important clues to how she conceived of her identity and to how she participated in various larger communities of Catholics, both in London and abroad. Here she exploits the English law of coverture, in which a wife did not enjoy legal rights and status as an individual but rather was "covered" under her husband's rights and status, to argue that because of Peter's position as both a Frenchman and a merchant, she does not have to take either oath. She also implied that Waller might start an inconvenient international incident should he press this issue against a French merchant's wife in violation of English and international law.

French and merchant communities were not the only Catholic networks in which Cellier participated to gain the connections and information she needed to act as boldly as she did. Throughout *Malice Defeated* and the published records of her two trials, she evinced a great degree of knowledge about legal issues pertaining to the identification, prosecution, and punishment of English Catholics. For example, in the above quote, she never refused outright to take the Oaths of Supremacy and Allegiance, though Waller would accuse her of refusal later. Her familiarity with the conditions under which such oaths might be taken included quite specific knowledge about who could offer a subject the oaths, and as is suggested by her taunt "Have you any Authority to offer them to me?" she knew Waller lacked such authority. She also knew to ask for some type of authorization when Waller attempted to take her to the Earl of Shaftesbury's home to be questioned, refusing to accompany Waller to the Earl's home: "[the Commission of the Peace] doth impower you to send me to Prison, if I be accused of any Crime, yet it doth not give you power to carry me any whither else" (p. 16). When Waller responded, "You are a dangerous Woman, and keep correspondence with Traytors," Cellier refuted this accusation by replying, "none can be properly call'd Traytors, but those that are Convict of

Treason; And do you know any such I keep correspondence with? *I am sure I know none*" (pp. 16-17). Finally, and most importantly, she knew enough about the laws of treason to craft her defense around whether the prosecution's chief witness, Thomas Dangerfield—also known as Willoughby, the indigent prisoner claiming to be Catholic who had drawn her into the Meal-Tub Plot—met the standards for reputation and believability laid down by law. When he did not, she was acquitted (p. 37).<sup>18</sup>

Although scholars have noted Cellier's familiarity with the law, few have questioned how she obtained it.<sup>19</sup> Again, larger developments within English Catholicism provide clues to how she obtained the means to defend herself effectively. Communities of Catholics arose not simply around geographic proximity but around books and ideas circulated among individuals who may never have met one another yet shared the challenges of practicing their Catholic faith in Protestant England. Cellier indicated her participation in such a network spanning England and the Continent when she described how she circulated copies of a Catholic text, *Danby Reflections*, to friends and acquaintances residing in England, France, and Flanders (p. 31).<sup>20</sup> Additionally, many Catholics had begun, as a survival practice, to develop, debate, and circulate strategies they could employ when questioned by Protestant authorities to prove their loyalty and avoid punishment under the penal laws.

From James I's attempts after the 1605 Gunpowder Plot to enforce the taking of an Oath of Allegiance to Charles II's Test Act of 1673, the government tried to identify who was Catholic and presumably loyal to the Pope above the English sovereign. The government denied such persons positions of public trust and enforced penalties. Like Cellier, however, the majority of English Catholics saw little contradiction in being both loyal subjects and faithful Catholics, trying different approaches to prove their fidelity. Some crafted new oaths they were willing to take, defining their spiritual allegiance to the papacy and temporal fidelity to their monarch and choosing their wording with utmost care. Others took the oaths as offered by the government but with mental reservations. Still others dissimulated by employing casuistry, creating a variety of rationalizations to justify why, because of the particular circumstances, taking the oath might not be against God or the monarch.<sup>21</sup>

Cellier followed the last approach, employing evasions practiced by English Catholics familiar with casuistry. For example, she circumvented Waller's request that she swear the oaths without an overt refusal. When Waller accused her of corresponding with traitors, Cellier provided a legal definition of "Traitor"—"none can be properly call'd Traytors, but those that are Convict of Treason"—a category into which none of her correspondents fell. When her questioners warned her, "if you know any thing you are bound to tell it," Cellier astutely replied, "I am only obliged to

answer Truth to such questions as I am asked” (p. 29). She later referred to the “Trepanning Questions” used “to insnare me” (p. 29). She viewed her inquisitors as trying to get into her brain to release what was there, yet she evaded their attempts with her well-chosen words and defense, typical of English Catholic casuistry. When she told her accusers that she proceeded “Singly and Alone,” she in all likelihood used a ploy to avoid incriminating others, as Cellier was obviously associated with numerous Catholics (p. 32).<sup>22</sup>

Despite such attempts to talk their way out of trouble, many Catholics, including Cellier, spent time in prison both as visitors and as inmates. Opportunities to forge communal ties within the prisons provided Cellier with more of the personal connections and information she needed to act. As I have argued in *Lest We Be Damned*, prisons were a crux of networks of Catholics residing within London, for both free and incarcerated Catholics gathered frequently within the jails where they could partake in Catholic sacraments and rituals, share texts, and enjoy fellowship within a community of coreligionists. Both priests and laypersons of many ranks either resided within the prisons or visited those who were incarcerated. Even when housed in different areas of the jail, prisoners received news, messages, books, and religious objects through subterfuge (McClain, pp. 62-70, 144-47).

Cellier regularly visited Newgate Prison, one of the largest in London. As she relates in the opening pages of *Malice Defeated*, she went to the prison to aid Catholic prisoners in jail:

I . . . thought it my duty through all sorts of hazards to relieve the poor imprison'd Catholicks, who in great numbers were lock'd up in Goals [sic], starving for want of Bread; and this I did some Months before I ever saw the Countess of Powis, or any of those Honourable persons that were accused. (p. 2)

She had expanded her relief efforts after the arrest of the five Catholic lords implicated in the Popish Plot when she came to the notice of the Countess of Powis, wife of one of the arrested nobles (King, p. 116). As she describes it,

about the latter end of January (78.) the Prisoners increasing very much, and being in great wants, I went at the request of Captain Pugh then in prison, with his Letter to her Ladyship, to make known their condition, and also to shew her a Letter written by Titus Oats, his own hand. (p. 2)

The countess named Cellier her almoner so that Cellier would now distribute a much greater amount of aid to imprisoned Catholics (p. 2).

Even after Cellier was first imprisoned in Newgate, she was able to communicate and exchange objects with other prisoners. For example, when in prison, she had no desire to speak with Dangerfield, the Meal-

Tub Plot informant with whom she was now imprisoned and whom she blamed for her troubles. Trying to reach her, Dangerfield threw little pieces of coal from his cell window to hers to get her attention. They spoke to one another from their respective windows, Dangerfield avowing he never had any intention of bringing trouble upon her, and Cellier rejecting his attempts to become involved with her again. Then Dangerfield said he could throw her papers that might help her cause by tying the papers to a coal and tossing them up to her. He also tried to throw an apple to her but missed. Becoming aware of this exchange between prisoners, a jailor nailed shutters over Cellier's windows to limit any further interactions (pp. 21-22, 32).

Through her chronicle, we witness the many types of Catholic activities and communities possible within Newgate. Cellier certainly had ample opportunity for intimate involvement within such networks, claiming she went "daily to the Prisons, to perform those Offices of Charity I was obliged to" (p. 2). Her delivery of a letter written by Titus Oates into the hands of the Countess of Powis at Captain Pugh's directive during the heated days of the Popish Plot indicates that she served as a go-between for powerful Catholics and the free and imprisoned Catholics in London. Her charitable work and advocacy at the prison, in fact, was what had brought her into contact initially with Dangerfield. In *Malice Defeated*, Cellier described how she heard rumors at the prison, particularly from Dangerfield, that prisoners knew about and possibly possessed evidence proving the Popish Plot a sham. In following up these rumors, motivated by her faith and desire to vindicate the loyalty of Catholic subjects, she became deeply involved with Dangerfield and eventually involved in the Meal-Tub Plot (pp. 7-15). Dangerfield later turned government informer, pointing his finger directly at Cellier. That such a plot could be furthered between free and imprisoned Catholics through their contact with one another in the prisons is indicative of the importance of the prisons as loci of Catholic communities.

#### *Action: Good Works and Relief of Prisoners*

Cellier's interactions with Catholics both in and out of Newgate helped set her on the path that would soon see her translating her religious motivation and means into activism within the context of Catholic women's good works.<sup>23</sup> At the same time, she accommodated the forms of her good works to the reality of practicing Catholicism in a Protestant country. By investigating Cellier's efforts to aid Catholic prisoners and her later attempts to begin a college of midwives, we can explore the transformations she made to traditional forms of charity and female institutions.

Cellier identified her purpose in visiting Newgate as the relief of Catholic prisoners. Such relief could take a variety of forms; she specifically

mentions paying prisoners' debts, arranging for food and drink, and providing additional services for Jesuits on trial for the Popish Plot. In *Malice Defeated*, she also protested against the harsh treatment of Catholic prisoners in jail (pp. 12-13). As her use of the term "Offices" to describe this work indicates, she viewed such efforts as the continuation of a centuries-old tradition of Catholic women performing good works by aiding prisoners through bringing food, caring for the sick, and the paying of debts.<sup>24</sup>

Cellier took the traditional approach to prison relief in a new direction when she submitted articles to Parliament to protest the maltreatment and torture she believed was occurring in Newgate. Cellier's accusation of torture, which was against the laws of England, angered the government and resulted in her being charged with libel.<sup>25</sup> Scholars frequently discuss how Protestant women learned to petition the government to address concerns and grievances during the Civil War and Interregnum periods.<sup>26</sup> Catholic men, too, had petitioned the government, such as in 1603 and 1604 for the greater toleration of private worship (McClain, pp. 260-61). Evidence of Catholic women submitting such documents, though, is seldom discussed. As Cellier demonstrates, Catholic women knew about the process. This does not necessarily mean they understood their actions in the same light as did Protestant women or Catholic men. Rather, I argue here that Cellier combined traditional forms of Catholic women's charity with the bold strategy recently employed by Englishwomen of placing articles before Parliament in an effort to adapt her charitable acts to the changing times in which she lived.

It is unclear whether the articles Cellier placed before Parliament actually were written by Cellier or by Dangerfield, who originally presented himself to Cellier as a witness and chronicler of abuse of Catholic prisoners while he was in Newgate.<sup>27</sup> The articles categorized mistreatment, naming specific prisoners who allegedly experienced such suffering. The allegations in *Malice Defeated* ranged from "debarring Prisoners liberty of Conscience" to illegal detention and various forms of torture (pp. 3-7).

Cellier was motivated to place these articles before Parliament because she, too, had witnessed the ill treatment of Catholics during her frequent visits to the prison. She describes walking "into the Lodge with five Women . . . and we all heard Terrible Groans and Squeeks which came out of the Dungeon, called the Condemn'd hole" (pp. 2-3). She took the initiative to question the origin of the noise and was first told by "Harris the Turnkey" that they were the cries of a woman in labor (p. 3). Being a midwife, Cellier offered her assistance. The turnkey then changed his story, telling Cellier that the sounds came from torture. Harris then "drove us away very rudely, both out of the Lodge, and from the Door" (p. 3).

Thus inspired, Cellier described her own assiduous efforts to investigate the conditions under which her fellow Catholics might suffer. She had long

resented, as discussed above, unfair persecution of Catholics. In response, she spied from behind doors inside the prison, waited outside the prison to monitor comings and goings, engaged others to keep reports on prisoners' treatment, and specifically directed one individual to "spy out the Truth" and watch the turnkeys (p. 3). She received intelligence almost daily and included such reports in *Malice Defeated*. She questioned guards as well as current and recently released prisoners about how Catholics were treated at Newgate. She provided money to pay prisoners' fees and received documents from prisoners (pp. 2-3, 7-8). She even succeeded in securing a change of jurisdiction for a prisoner, describing how she "removed him by Habeas-Corpus to the Kings Bench" (p. 8).

In sum, Cellier's efforts on behalf of prisoners borrowed from a traditional template of Catholic women's good works but embraced new forms for those works through her submission of articles to Parliament and her extreme efforts to investigate prison abuse. As Kim Walker has noted, Protestant women's writing and activities contained elements of conformity and compromise but also of appropriation and confrontation.<sup>28</sup> So did Cellier's, but the conformity, compromise, appropriation, and confrontation assume different forms due to her Catholicism. This is true for her endeavors in Newgate but also for her later passion, following her release, to create a new female-run institution, which she modeled, I argue, on a Catholic convent.

#### *Action: Good Works and Women-Run Institutions*

It is unclear when Cellier exited prison, but by 1687 she was again practicing midwifery in London in the parish of St. Clement Danes.<sup>29</sup> She proposed a radically new women-run institution that same year: a royally sponsored foundling hospital and college to incorporate and train midwives. Midwifery underwent profound changes in early modern England as this traditionally female profession became increasingly integrated into male-dominated medical practice.<sup>30</sup> In *A Scheme for the Foundation of a Royal Hospital*, Cellier advocated creating a professional corporation of approximately 2,000 female midwives in London, ostensibly to train midwives better and to improve the survival rates for pregnant women, mothers, and infants. This would be combined with a hospital to care for London's many orphaned or abandoned children (pp. 243-44). In *To Dr.—An Answer to his Queries, concerning the Colledg of Midwives*, she gave men a loose supervisory function over the institution, but women would run it on a day-to-day basis in keeping with Cellier's belief that midwifery "ought to be kept as a Secret amongst Women as much as is possible" (p. 3).

Scholars such as Lisa Cody and Helen King have explored various aspects of Cellier's *A Scheme for the Foundation of a Royal Hospital* and *To Dr.—An*

*Answer to his Queries*, placing Cellier within the history of the increasing professionalization of female midwifery and commenting on the dismissal of her plans on the grounds of her Catholicism.<sup>31</sup> Researchers emphasize Cellier's "feminist tone," her rational use of public records and statistics to document the social problems for which her hospital and college would provide solutions, and her logical plans to ensure long-term funding for the institution. Suzuki summarizes Cellier's proposal as "a significant example of proto-Enlightenment rationality."<sup>32</sup> What rarely receives sufficient analysis, however, is how her faith may have motivated her to create this new, ostensibly secular institution and influenced the form she proposed for it.<sup>33</sup> King, for example, has expressed confusion over Cellier's intent in the organization of this new institution. On one hand, Cellier encouraged women to keep as much control over midwifery as possible. On the other, she replaced formerly female professional networks of training and practice with what appear to King to be a male-led professional hierarchy. "What is going on here?" King asks (p. 124).

Cellier's intent becomes more understandable when her proposals are examined from the perspective of her Catholicism. The creation of a foundling hospital and efforts to aid mothers and children certainly fall within an historical tradition of good works performed by Catholic women.<sup>34</sup> A college for the training of female midwives, however, is, like Cellier's activities on behalf of prisoners, something new.<sup>35</sup> Her innovation was in part because her faith directly impacted her ability to practice midwifery legally in England. Following the Restoration, the authority to license midwives lay with the Church of England. King suggests that, as a Catholic, Cellier may have been marginalized within her profession in London or excluded from networks among midwives (p. 121). The oaths required of midwives emphasized Protestant fears about Catholic midwives, priests, and rituals through language that prohibited the presence of Catholic priests, the Catholic sacrament of baptism, the performance of Mass or any other Latin service as part of a midwife's work.<sup>36</sup> It is not surprising that scholars have found no evidence of Cellier receiving a license to practice midwifery as it is unlikely her religious convictions would allow her to swear the required oath. Lack of licensing does not appear to have affected her employment opportunities, however, since many Catholic families desired a midwife who would not object to Catholic rituals during the birth or who would perform baptism *in extremis* according to the Catholic rite should it be necessary (King, p. 122).

In addition to the influence Cellier's Catholicism exerted on her practice of midwifery, it also appears to have influenced her proposal for the royal foundling hospital and college of midwives. Her organization and language reflected Catholic monastic traditions with, for example, oversight and funding resembling that of a convent. In *A Scheme for the Foundation of*

a *Royal Hospital*, Cellier proposed that the institution be subject to “Rules,” just as a religious order followed a rule, and “Visitations,” just as convents received regular visitations by male clerics (p. 243). Midwives would pay an entrance fee and dues to be a part of the college, just as convents required payment to reside at the convent and perhaps take holy orders. The institution would accept charitable donations such as “Lands, Legacies, or other Gifts,” just as convents encouraged (p. 244). Reminiscent of the poor box established centuries earlier in Roman tradition, Cellier requested “Leave, to set up in every Church, Chapel, or publick Place of Divine Service of any Religion whatsoever . . . one Chest or Box, to receive the Charity of all well-minded People, who may put Money into the same” (p. 244).

The organization and hierarchy of the proposed hospital are also strikingly similar to those of a convent.<sup>37</sup> Cellier intended her college to be inhabited by unmarried women and run by a Governess, assisted by a Secretary and twelve Matron-assistants, all of them female, similar to the roles of Abbess, Prioress, and other offices in convent hierarchies (p. 244). Her choice of twelve as the number of Matron-assistants, as well as the number of “lesser houses” (satellite institutions of the main hospital), may also have religious significance, recalling the number of apostles (p. 245).<sup>38</sup> The organization of satellite institutions operating under the authority of a main house evokes the structure of mother houses over smaller houses within the history of religious orders. Moreover, Cellier’s desire to place her institution under the direct authority of the Catholic King James II as opposed to the Protestant Church of England which, as mentioned above, possessed legal authority to license midwives, is similar to efforts of Catholic institutions from Cluny to, more recently, the Society of Jesus (Jesuits) to circumvent traditional hierarchies and report directly to a higher authority assumed to be more sympathetic to their mission.

The structure and rules of the foundling hospital also harken to monastic tradition. Orphans would be separated by sex after five years of age. Foundlings would be “marked with a Cross of Blue under the Brawn of the Arm” (p. 247). They would thus be visibly distinguishable from the rest of the population by a religious marker, just as female religious wore distinguishing clothing with religious associations. Foundlings might, under the approval of the Governess, adopt new surnames, recalling nuns’ adoption of new names in consultation with convent leaders on the taking of orders. Foundlings would be educated according to their abilities, and while in their minority, were to be considered “Members of, and Apprentices to the said Society” similar to a novitiate (p. 245). They could stay until twenty-one years of age, at which time they could choose to become a full-fledged member of the college or depart, just as women raised in a convent faced a choice to take vows or walk a different path (p. 245).

Cellier’s proposal allowed but discouraged male involvement in the new

institution. Cellier stipulated that “no men shall be present at such public Lectures, on any Pretense whatsoever, except such able Doctors and Surgeons, as shall enter themselves Students in the said Art,” just as only certain trained men (clerics) were supposed to venture beyond the convent grate into direct contact with a convent’s residents (p. 248). Although Cellier opened the possibility of men joining the college, she suggested a prohibitive initiation fee of £10 and £10 annual dues, double the rate charged women (pp. 247-48).

Cellier proposed a supervisory role for men within the institution, similar to the oversight male clerics exercised over a convent. Like nuns, the midwives would vote on administrative issues, including which male should hold the office of principal Physician or Man-midwife (pp. 246-48). The man should visit the college periodically—Cellier suggested once a month—to conduct trainings but should not reside at the college or visit on a frequent basis. This is reminiscent of the visits of male confessors to convents. Confessors were to call periodically—also once a month—to perform the sacraments, but women complained if confessors used their role to insinuate themselves into convent life.<sup>39</sup> In *To Dr.— An Answer to his Queries*, Cellier assured male physicians that “we desire you not to concern your selves [with the business of midwifery], until we desire your Company” (p. 5). As nuns were allowed, and in some cases encouraged, to report to the Abbess or Prioress any dissatisfaction with the guidance of male clerics who served the convent, so did Cellier propose in *A Scheme for the Foundation of a Royal Hospital* that female midwives should report any “extraordinary Occurrents” from the principal male physician or midwife to the governess. Just as within the convent structure, Cellier’s organizational structure and practices allowed women the possibility of divesting themselves of male leadership that they found inappropriate or uncongenial (p. 245).

Overall, it is not surprising that Cellier proposed organizational elements for a predominantly female organization along conventual lines. Catholic women had been doing so surreptitiously within England for the last century. Luisa de Carvajal, a Spanish Catholic attached to the Spanish ambassador’s household, created a community of young English Catholic women who engaged in a lifestyle similar to that of a convent for approximately nine years in Carvajal’s house in Spitalfields.<sup>40</sup> Mary Ward’s Institute of English Ladies offered Catholic women on the Continent and within England the opportunity to join in a religious community modeled after the Jesuits.<sup>41</sup> Moreover, although England was a Protestant nation that had dissolved both male and female monastic institutions over a century earlier, the convent was kept alive in the popular imagination through works such as Margaret Cavendish’s *The Convent of Pleasure* (1668) and Aphra Behn’s *The History of the Nun, or the Fair Vow-Breaker* (1688).

Cellier’s efforts to establish a hospital and college for midwives along

Catholic models are best understood in light of more widespread Catholic efforts to found openly Catholic or Catholic-influenced institutions following the ascension of James II. Following his brother Charles II's deathbed conversion to the Catholic faith, James was crowned King James II of England and Ireland and James VII of Scotland in 1685. As he had been publicly Catholic since 1672, James's personal religious loyalties were clear. In spring 1687, James II increased Protestant fears of an island-wide return to the Roman faith by issuing his Declaration of Indulgence. Although the penal laws against both Catholic and Protestant dissenters remained in place, James II used his dispensing power as monarch to suspend the enforcement of the laws. The result allowed open religious worship.<sup>42</sup>

English Catholics' confidence in a changing environment in which they could practice their faith was so high that they began forming institutions according to traditional Catholic models as early as 1686. Even before James II issued his Declaration of Indulgence, the Benedictines, Carmelites, and Franciscans were organizing schools and chapels, particularly in London. The Jesuits followed in 1687.<sup>43</sup> Such new institutions should not be seen as identical to Catholic organizational structures in predominantly Catholic countries where the practice of Catholicism was legal, even required, and enjoyed widespread popular support. Instead we should look for use and adaptation of models to best meet English needs within a legally Protestant country in which prejudice ran high. Cellier's efforts may be seen as part of this broader Catholic effort to form new institutions inspired by traditional Catholic models.

### *Conclusion*

Although Cellier claimed James II approved her proposal, neither the hospital nor the college ever materialized.<sup>44</sup> The Glorious Revolution forced James II into exile, and Cellier disappeared from the historical record.<sup>45</sup> Cellier lived during a tumultuous period of English history. There were, no doubt, many factors influencing her actions, including debates over gender, her professional passion, evolutions in both literary forms and print culture, and her Royalist sympathies. Among these, I believe, one must consider her Catholicism to be of crucial significance. Her faith provided Cellier with a strong motivation to speak out against what she viewed as religiously inspired injustice. The Catholic networks in which she participated gave her the means to practice her faith, perform good works, and publicize offenses allegedly committed against her coreligionists. It is likely these networks also helped school Cellier in the legal knowledge and artful casuistry she employed in her defense, even as anti-Catholic laws and sentiments circumscribed her professional and public actions and helped land her in prison. Finally, the ways in which she chose to act on

behalf of her fellow Catholics and her chosen profession reflect the strong influence of both traditional expectations of Catholic women's good works and the institutional models provided by Catholic convents although taken in new directions by Cellier.

To understand Cellier more fully, and to better comprehend the impact of her contributions upon a significant minority population, we must see her as she surely saw herself: as a woman with political and professional interests but also as a Catholic woman in a Protestant country, shaped by her faith and seeking to accommodate its influence and guidance to the realities of her situation. Cellier needs to be viewed as part of an active network of English Catholics, and she also needs to be understood within European-wide developments of women's and Catholic charitable institutions. We should not, however, expect to see her efforts conform strictly to rules laid down by the Council of Trent to which women in predominantly Catholic countries adhered. As mentioned above, religion—and believers' engagement with it—changes as the environment in which the faith is practiced changes.<sup>46</sup> This analysis contributes to a more concerted effort to weave Cellier, along with other women writing and publishing from a Catholic perspective, into broader narratives of women and debates over gender in the seventeenth and eighteenth centuries but with a closer consideration of faith as part of the equation. Such women were not acting "Singly and Alone"; rather, they were active participants in the religious, political, social, and gendered debates of their era.

#### NOTES

<sup>1</sup> Elizabeth Cellier, *Malice Defeated: Or a Brief Relation of the Accusation and Deliverance of Elizabeth Cellier*, in *Elizabeth Cellier, The Early Modern Englishwoman: A Facsimile Library of Essential Works*, Printed Writings, 1641-1700, series 2, part 3, vol. 5, comp. Mihoko Suzuki (Aldershot: Ashgate, 2006), 32. Subsequent references will be cited parenthetically in the text.

<sup>2</sup> See Penny Richards, "A Life in Writing: Elizabeth Cellier in Print Culture," *Women's Writing*, 7 (2000), 413, 419; Lisa Forman Cody, *Birthing the Nation: Sex, Science, and the Conception of Eighteenth-Century Britons* (Oxford: Oxford University Press, 2005), 67; and Frances E. Dolan, "'The Wretched Subject the Whole Town Talks of': Representing Elizabeth Cellier (1680)," in *Catholicism and Anti-Catholicism in Early Modern English Texts*, ed. Arthur F. Marotti (New York: St. Martin's, 1999), 222.

<sup>3</sup> See Suzuki, introduction to *Elizabeth Cellier*, ix-xv; Helen King, "The Politick Midwife: Models of Midwifery in the Work of Elizabeth Cellier," in *The Art of Midwifery: Early Modern Midwives in Europe*, ed. Hilary Marland (London: Routledge, 1993), 115-29; Rachel Weil, "If I did say so, I lyed," in *Political Culture and Cultural Politics in Early Modern England: Essays Presented to David Underdown*, eds. Susan D. Amussen and Mark A. Kishlansky (Manchester: Manchester University Press, 1995), 189-209; Richards, "A Life in Writing"; Dolan, "The

Wretched Subject the Whole Town Talks of," 225; and Margaret George, *Women in the First Capitalist Society* (Urbana: University of Illinois Press, 1988), 112-33. Subsequent references to King will be cited parenthetically in the text.

<sup>4</sup> King, for example, correctly asserts that Cellier's "Catholicism and her midwifery are deeply linked," but her analysis focuses primarily on links in the minds of her critics (p. 115). A notable exception is Dolan, who attempts to place Cellier's writings and critics' responses into well-recognized categories of Catholic, women's, and other writings (pp. 229-46).

<sup>5</sup> Cellier's *Malice Defeated*, as well as *A Scheme for the Foundation of a Royal Hospital, and Raising a Revenue of Five or Six-thousand Pounds a Year, by, and for the Maintainance of a Corporation of skilful Midwives, and such Foundlings, or exposed Children, as shall be admitted therein* and *To Dr.— An Answer to his Queries, concerning the Colledg of Midwives* appear in Suzuki, comp., *Elizabeth Cellier*. Subsequent references to all three works will be cited parenthetically in the text.

<sup>6</sup> See Marie B. Rowlands, "Recusant Women, 1560-1640," in *Women in English Society, 1500-1800*, ed. Mary Prior (London: Methuen, 1985), 112-35; Roland Connelly, *The Women of the Catholic Resistance: In England, 1540-1680* (Edinburgh: Pentland Press, 1997); Dolan, "Reading, Work, and Catholic Women's Biographies," *English Literary Renaissance*, 33 (2003), 328-57; Patricia Crawford, *Women and Religion in England: 1500-1720* (London: Routledge, 1993); and Dorothy Latz, *Glow-Worm Light: Writings of Seventeenth-Century English Recusant Women from Original Manuscripts*, Salzburg Studies in English Literature (Salzburg: Aus Institut für Anglistik und Amerikanistik, Universität Salzburg, 1989).

<sup>7</sup> Lisa McClain, *Lest We Be Damned: Practical Innovation and Lived Experience among Catholics in Protestant England, 1559-1642* (London: Routledge, 2004), 1-17. Subsequent references will be cited parenthetically in the text.

<sup>8</sup> Richards, "A Life in Writing," 411-12.

<sup>9</sup> See Paula McDowell, *The Women of Grub Street: Press, Politics and Gender in the London Literary Marketplace, 1678-1730* (Oxford: Clarendon Press, 1998); Susan Wiseman, *Conspiracy and Virtue: Women, Writing and Politics in Seventeenth Century England* (Oxford: Oxford University Press, 2006); and Katharine Gillespie, *Domesticity and Dissent in the Seventeenth Century* (Cambridge: Cambridge University Press, 2004).

<sup>10</sup> For a full description of the Popish Plot crisis, see Richard L. Greaves, *Secrets of the Kingdom: British Radicals from the Popish Plot to the Revolution of 1688-1689* (Stanford: Stanford University Press, 1992); and J. P. Kenyon, *The Popish Plot* (London: Heinemann, 1972).

<sup>11</sup> Cellier defended herself, as individuals accused of treason were not allowed counsel; see George, *Women in the First Capitalist Society*, 124.

<sup>12</sup> Weil, "If I did say so, I lyed," 189-90.

<sup>13</sup> See *Cobbett's Complete Collection of State Trials*, quoted in George, *Women in the First Capitalist Society*, 128.

<sup>14</sup> *The Scarlet Beast Stripped Naked, Being the Mistery of the Meal-Tub the second time Unravelled; Or a Brief Answer To the Popish-Midwives scandalous Narrative, Intituled Mallice defeated* (London: 1680). See also *The Popes Letter, to Maddam Cellier In Relation to her great Sufferings For the Catholick Cause* (London: 1680) and *Mistriss Celier's Lamentation For the loss of her Liberty* (London: 1681). Facsimiles of all three appear in Suzuki, comp., *Elizabeth Cellier*.

<sup>15</sup> Weil, "If I did say so, I lyed," 195.

<sup>16</sup> See H. Bowler, *London Sessions Records, 1605-1685* (London: 1934), 202-03, which is discussed in King, "The Politick Midwife," 116.

<sup>17</sup> Cellier was presumed to be deeply involved in networks of English Catholics on the Continent, as the Lord Chancellor also questioned Cellier as to whether she had been to Flanders, which she denied; see Cellier, *Malice Defeated*, 27-28.

<sup>18</sup> Her legal knowledge was sufficient to allow her to employ writs of habeas corpus, subpoena witnesses, request postponement of her trial so she could arrange for her witnesses to travel to London, question specific statutes under which she was indicted, and request documents from the prosecution to help build her case (*Malice Defeated*, pp. 7-8, 30, 33, 37).

<sup>19</sup> For example, see Suzuki, introduction to *Elizabeth Cellier*, x-xi. Richards suggests Cellier must have been helped by other Catholics but does not explore how this might have occurred (p. 418).

<sup>20</sup> Cellier is most likely referring to J. B., *Some Reflections Upon the Earl of Danby, In Relation to the Murther of Sir Edmondbury Godfrey, In a Letter to Friend* (London: 1679). The text concerns the Tory leader Thomas Osbourne, Earl of Danby, impeached from office and imprisoned in the Tower of London for his alleged role in the Popish Plot.

<sup>21</sup> See McClain, *Lest We Be Damned*, 49-54, 255-68; and P. J. Holmes, ed., *Elizabethan Casuistry* (London: Catholic Record Society, 1981).

<sup>22</sup> See also George, *Women in the First Capitalist Society*, 122; and Dolan, "The Wretched Subject the Whole Town Talks of," 225.

<sup>23</sup> Cellier's faith, according to Dolan, appears characterized by her works more so than by an intensity of devotion although scholars should remember that Cellier's writings likely provide an incomplete picture of her faith; see Dolan, "The Wretched Subject the Whole Town Talks of," 229.

<sup>24</sup> Prisoners were a well-recognized category of "the poor"; see Michael Mollet, *The Poor in the Middle Ages: An Essay in Social History*, trans. Arthur Goldhammer (New Haven: Yale University Press, 1986), 3; Robert H. Bremner, *Giving: Charity and Philanthropy in History* (London: Transaction, 1994), 11-22, 45-54; Elizabeth Rapley, *The Dévotes: Women and Church in Seventeenth-Century France* (Kingston, ON: McGill-Queen's University Press, 1990), 5-9, 74-94, 195; Ann Ramsey, *Liturgy, Politics, and Salvation: The Catholic League in Paris and the Nature of Catholic Reform, 1540-1630* (Rochester: Rochester University Press, 1999), 175-76; Thomas Max Safley, ed., *The Reformation of Charity: The Secular and the Religious in Early Modern Poor Relief* (Boston: Brill, 2003), 1-14; Susan E. Dinan, "Motivations for Charity in Early Modern France," in *The Reformation of Charity*, 176-92; William A. Christian, Jr., *Local Religion in Sixteenth-Century Spain* (Princeton: Princeton University Press, 1989), 17; and P. H. Cullum, "Gendering Charity in Medieval Hagiography," in *Gender and Holiness: Men, Women, and Saints in Late Medieval Europe*, eds. Samantha Riches and Sarah Salih (New York: Routledge, 2002), 135-51.

<sup>25</sup> For a discussion of issues involved, see Weil, "If I did say so, I lyed," 189-90; and Suzuki, introduction to *Elizabeth Cellier*, ix.

<sup>26</sup> See Crawford, *Women and Religion in England*, 74, 97, 119-208; McDowell, *The Women of Grub Street*, 95; Wiseman, *Conspiracy and Virtue*, 1-32; Suzuki, introduction to *Elizabeth Cellier*, x; and Richards, "A Life in Writing," 416.

<sup>27</sup> Catholic prisoner Mary White told Cellier about Dangerfield who had “made it his Business to inspect the Usage of the Prisoners, and had drawn articles against the Keepers” (*Malice Defeated*, p. 4).

<sup>28</sup> Kim Walker, *Women Writers of the English Renaissance*, English Authors Series (New York: Twayne, 1996), 25.

<sup>29</sup> Richards claims evidence represents Cellier as a practicing midwife by 1684 (pp. 413-14), but King argues the evidence supports her reappearance in 1687 (p. 115).

<sup>30</sup> Hilary Marland, ed., *The Art of Midwifery: Early Modern Midwives in Europe* (London: Routledge, 1993).

<sup>31</sup> See Cody, *Birthing the Nation*, 47, 61-74; and King, “The Politick Midwife,” 120-24.

<sup>32</sup> Suzuki, introduction to *Elizabeth Cellier*, xi-xiii. See also Richards, “A Life in Writing,” 419-420; George, *Women in the First Capitalist Society*, 130; and Antonia Fraser, *The Weaker Vessel* (New York: Vintage, 1994), 460-61, 469-70.

<sup>33</sup> Suzuki comments that the hospital is founded after the model of a Catholic convent in that it is run by women and relatively free of male authority but explores no further (p. xii).

<sup>34</sup> Merry E. Wiesner-Hanks, *Women and Gender in Early Modern Europe*, 3rd ed. (Cambridge: Cambridge University Press, 2008), 231.

<sup>35</sup> Cody notes the similarities between Cellier’s proposed institution and the Catholic Hôtel Dieu in Paris (p. 70).

<sup>36</sup> See Cody, *Birthing the Nation*, 47; and Edward Poeton, *The Midwives Deputie or a help for such as are not well furnished with knowledg concerning the misteries of that profession*, Western Manuscripts, Sloane MS 1954, 9v, British Library.

<sup>37</sup> For a description and discussion of convent organization in this era, see Mary Laven, *Virgins of Venice: Broken Vows and Cloistered Lives in the Renaissance Convent* (New York: Viking, 2003), 1-22, 41-43, 45-66.

<sup>38</sup> Catholic use of number symbolism in the early modern era has been well documented; see, for example, Ramsey, *Liturgy, Politics, and Salvation*, 198-213.

<sup>39</sup> See Laven, *Virgins of Venice*, 19, 159-85.

<sup>40</sup> See Nancy Bradley Warren, *The Embodied Word: Female Spiritualities, Contested Orthodoxies, and English Religious Cultures, 1350-1700* (Notre Dame: University of Notre Dame Press, 2010), 97-146; and Georgiana Fullerton, *The Life of Luisa de Carvajal* (London: Burns and Oates, 1873), 242-45.

<sup>41</sup> See M. Immolata Wetter, *Mary Ward: Under the Shadow of the Inquisition*, trans. M. Bernadette Ganne and M. Patricia Harriss (Oxford: Way Books, 2006). Also, in her best known writings, *A Serious Proposal to the Ladies, for the Advancement of Their True and Greatest Interest* (1694) and *A Serious Proposal, Part II* (1697), Mary Astell proposed an educational institution for young women organized much like a convent.

<sup>42</sup> James II discovered Charles II’s written arguments for the superiority of Catholicism over Protestantism and published them, challenging Anglican churchmen to refute them. He gave Catholics command of military regiments without requiring them to take the Test Act and surrounded himself with Catholic councilors at the highest level. For more information and interpretation of James II’s pro-Catholic endeavors, see W. A. Speck, *James II* (London: Longman, 2002); and John Miller, *James II*, 3rd ed. (New Haven: Yale University Press, 2000).

<sup>43</sup> See “A Contribution to the History of Savoy College,” *Letters and Notices*, April 1926, 138-44, <http://jesuitinstitute.org/Resources/SavoyCollegeHistory.pdf>.

<sup>44</sup> See Cellier, *To Dr.— An Answer to his Queries*, 7; King, “The Politick Midwife,” 120; and Suzuki, introduction to *Elizabeth Cellier*, xi.

<sup>45</sup> Richards maintains that evidence in French archives supports the possibility that Cellier, as royal midwife, followed James II to France (p. 414).

<sup>46</sup> Laven, *Virgins of Venice*, xxvi, chapter 4, 204-05.