

differences do exist, Haulman is careful to point those out, but taken together, these differences suggest greater regional (not to mention urban versus rural) divides than Haulman acknowledges. Nonetheless, readers of this journal will be interested to see many familiar Philadelphia names in the impressive research Haulman did in that city's archives.

Readers should be sure not to miss the closing epilogue for the book, which ties fashion to race, the body, and citizenship in the 1790s and early 1800s in thoughtful and concise ways. While neither race nor the body is the focus of the book, there are times when further discussion of the body in particular would be helpful. I wanted to know more, for instance, about her claim that the hoop petticoat "bespoke women's control over their bodies" (53), or what it meant that the foppish "macaroni cut" (135) created narrow silhouettes for men. Overall, the question of the way fashion "makes" rather than simply reflects ideas about the body, race, class, or gender could be further probed. Haulman's work certainly paves the way for future studies of fashion in any era in this regard.

The book's historiographical significance reaches far beyond fashion, however. Specialists in material culture will find this book an excellent complement to Linda Baumgarten's *What Clothes Reveal*, as Haulman's arguments expand and complicate rather than contradict Baumgarten's study. It contributes to scholarship by historians such as T. H. Breen and Kariann Yokota on consumer choices as expressions of political belief in early America, as well as entering a growing conversation on political economy that situates international trade at the center of power struggles in the Atlantic world. In its broadest sense, Haulman's study is an exciting addition to a new wave of discussion, particularly among scholars of gender and culture, about the very meaning and scope of politics and how to write a new sort of political and cultural history.

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Mark Jacob and Stephen H. Case. *Treacherous Beauty: Peggy Shippen, the Woman behind Benedict Arnold's Plot to Betray America* (Guilford, CT: Lyons Press, 2012). Pp. 288. Illustrations, notes, bibliography, index. Cloth, \$24.94.

Some sixty years ago popular historical writer James T. Flexner published *The Traitor and the Spy: Benedict Arnold and John André* (1953, with a slightly

updated bicentennial edition in 1975). Peggy Shippen did not make the subtitle, perhaps a reflection at that time of as yet untapped public interest in women's history; however, she was a major player in Flexner's presentation. The flirtatious, outwardly vapid teenager Peggy, the product of an upper-class, loyalist/neutralist-leaning family, was allegedly smitten with the dashing, dandyish André during the British occupation of Philadelphia during 1777–78. Just how affectionate they were toward each other was left to the reader's imagination, but some sort of adoring relationship there apparently was. When British forces evacuated Philadelphia in June 1778, wounded rebel war hero Benedict Arnold took command of the city as George Washington's chosen military governor. Through twists and turns beautiful Peggy became so enamored of Arnold, who was twice her age, that they married in April 1779, roughly a month before he made his first overtures to return his loyalty to the British via a message sent through an intermediary to none other than Peggy's adoring friend André. Flexner concludes that Peggy stoked the fire that drove the supposedly ever-greedy Arnold forward in what became a plot to turn the vital West Point defenses over to the British in a desperate plan to crush the American rebellion.

Six decades later journalist Mark Jacob and lawyer Stephen H. Case have presented the same basic story, perhaps with a bit more emphasis on Peggy and with less attention given to André. Although mentioning Flexner, the authors contend that they have produced "the first nonfiction book to focus on Peggy's life" rather than merely "to depict her as a supporting character in her husband's story" (vi). Clearly a genuflection to expanding public interest in women's history, their claim is somewhat misleading. The authors have not separated Peggy's story in any significant way from Arnold's. As for the heroic traitor, he remains a central character in their saga. Based on a review of index citations, Arnold receives as much attention as Peggy, if not more. To appreciate Peggy as her own person separate from her infamous husband may be virtually impossible, especially in a book with a subtitle declaring her "the woman behind Benedict Arnold's plot to betray America."

Since Peggy once again turns out to be an Eve-like figure holding forth the forbidden fruit to her corruptible husband, what then of Arnold's persistent presence in this historical drama? He functions more or less as a convenient punching bag for authors Jacob and Case, who repeat everything from fabricated tales about his dissolute youth to a barrage of less than flattering judgments regarding his presumed venal character. To take one example, Peggy described Arnold as "the best of husbands" in a March 1786 letter to

her father. Shortly thereafter, according to the authors, she discovered that “her husband had been a traitor to their wedding vows.” An infant by the name of John Sage, presumably Arnold’s love child by another woman, was born around that time. Certainly, insist Jacob and Case, baby John must have been his child, since Arnold later provided for Sage in his will. The result was that a furious Peggy supposedly “never again used such exalted language to describe her husband, at least not during his lifetime” (203–4).

In reality, it is just as likely that one of Arnold’s older sons fathered, or one of the family’s maids bore, little John Sage, in the latter circumstance with any number of potential fathers residing in the town of St. John, New Brunswick, Canada. It is also possible that Sage was an apprentice attached to the family mercantile business operating out of St. John. Arnold did have a generous side, as witnessed by the large amount of personal funds that he initially poured into supporting the patriot rebellion. Providing a modest sum for Sage thus may well have been a charitable act rather than an admission of violated wedding vows.

The authors do not explore alternative explanations in their rush to such facile judgments. If Peggy was so hopelessly offended, then why did she write her son Richard in August 1794 about being “in a state of most extreme misery” because of a report that Arnold had been made a prisoner of the French in the Caribbean area (216)? Perhaps her grave concern was a reflection of having just borne a new infant two months earlier. Indeed, back in September 1787, she had given birth to another son, conceived within a few months of the time the authors assert that Peggy had learned about alleged love child John Sage. Apparently, though, Peggy was not upset enough to stop sleeping with her husband or bearing more children with him. Moreover, after Arnold died in June 1801, she wrote to her eldest son Edward that she had just been “deprived of an excellent husband, and you one of the best fathers” (letter not presented by the authors, contained in the Arnold Family Correspondence Collection, New York Public Library). A little over a month later Peggy wrote to her brother-in-law Edward Burd that she had lost “a husband whose affection for me was unbounded”; however, Jacob and Case quote from another part of this same letter that ignores this testimonial in favor of what Peggy stated (out of context) about her “sufferings” and “years of unhappiness,” apparently all caused by her adoring husband (219).

So it remains unclear what Peggy really means to be telling us about her relations with Benedict Arnold—or about the meaning of her life as her own person for that matter. In *Treacherous Beauty* the authors too often present conclusions without considering alternative explanations or

carefully evaluating all of the evidence. Certainly this book is well written, definitely a page turner, but it pretty much repeats the same old storyline found in Flexner's *Traitor and Spy* and a smattering of other secondary source treatments. As such, Peggy Shippen Arnold remains an elusive—and certainly controversial—historical figure.

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Harvey Bartle III. *Mortals with Tremendous Responsibilities: A History of the United States District Court for the Eastern District of Pennsylvania* (Philadelphia: St. Joseph's University Press, 2011). Pp. 273, illustrations, preface, index. \$35.00.

There are ninety-four federal district courts in the United States. These are the courts where litigation begins; they are the “work horses” of the federal court system. In 2008–9 the US Supreme Court heard 87 cases, the United States Courts of Appeal heard 58,000 cases, and the United States District courts heard 353,00 cases. *Mortals with Tremendous Responsibilities* is the story of one of these federal district courts, the US District Court for the Eastern District of Pennsylvania. The federal court in Philadelphia was one of the first district courts set up by Congress in the Judiciary Act of 1789 and this book covers the court from its inception to the present. The author, Harvey Bartle III, was appointed to the court in 1991 and served as its Chief Judge from 2006 to 2011. The volume, according to Judge Bartle, “is intended not only to memorialize the story of this court, but also to serve as a reminder of the consequential role that this court has played” in the history of the federal judiciary.

Many of the important cases in the legal canon had their beginnings in the Eastern District Court. *U.S. v. E.C. Knight Co.* (1895) is one of them. The Supreme Court upheld the ruling of the Eastern Pennsylvania District Court that a monopoly of manufacturing did not mean a restraint of trade. This decision seriously weakened the Sherman Anti-Trust Act. *Lemon v. Kurtzman* (1971), dealing with the separation of church and state, also began in Pennsylvania. The question involved a Pennsylvania state law that provided public funds to pay teacher salaries in sectarian schools. The district court upheld the law, but the Supreme Court overturned the