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PROSECUTION FOR WAR CRIMES AS PART OF WAR TERMINATION: MISSED OPPORTUNITY IN THE GULF

by

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A paper submitted to the Faculty of the Naval War College in partial satisfaction of the requirements of the Department of Operations.

The contents of this paper reflect my own personal views and are not necessarily endorsed by the Naval War College or the Department of the Navy.

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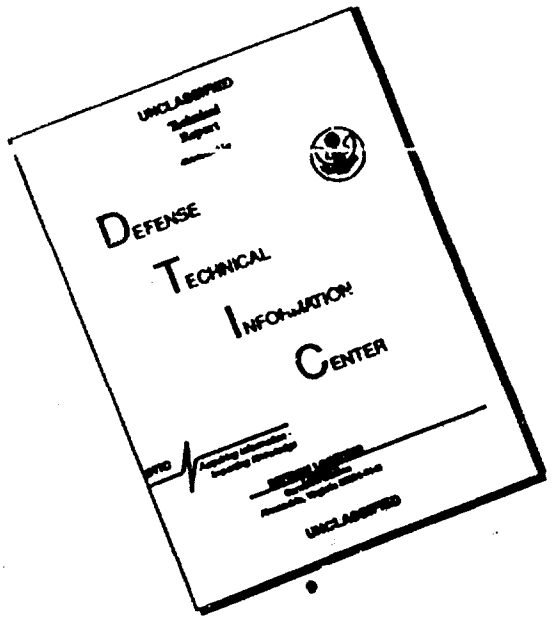

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Abstract

This paper examines the prosecution of war crimes as part of the war termination process. Unique aspects of the American strategic culture are identified to demonstrate how ensuring accountability for violations of international law accords with our preconditions for employing military force. The humanitarian and pacifistic foundations of the law provide a framework for constraints on the means and methods of warfare, as well as limiting the suffering of the victims of war. Although the United States and its Coalition partners scrupulously adhered to these standards, Iraq demonstrated a total disregard for these rules in the Gulf War. Because neither the United States nor the United Nations established accountability for war crimes as a political aim of the war, the war termination did not include enforcement of applicable standards through war crimes trials. As a result, Operation Desert Storm failed to be a defining event for the primacy of international law in the new world order.

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Introduction

The 1993 National Security Strategy of the United States, promulgated on the eve of turning this nation over to a new administration, contained both a reaffirmation of our previous political agenda and a vision for our future. This new world order, to be shaped and lead by the United States, is a community of nations joined by the shared values of " freedom, human rights, economic prosperity, the rule of law, peace ...".[1] This document also cautioned that "to succeed, our strategy must be more than words on a piece of paper".[2]

This "Age of Democratic Peace" has already been threatened by atrocities and war crimes on a massive scale in Bosnia, which to this point have been met with universal words of condemnation, and ineffective diplomacy and economic sanctions. While the United Nations (U.N.) has appointed a commission to document these crimes with the view towards holding the individuals and their commanders accountable, it is uncertain whether the international community will have the will to actually pursue prosecution once a peace accord is finally achieved.[3] My concern is that once again political expediency will overshadow concern for the rule of law, and that the new world order will continue to look very much like the old.

The purpose of this paper is to examine the prosecution of war crimes as part of the war termination process. I posit that

such prosecutions are consistent with our strategic culture; that holding those guilty of war crimes accountable for their actions should be included in our political aims before applying the military instrument; and that only by conducting such prosecution will international standards prove to be an effective deterrent in future wars. The primary conflict examined is the War in the Persian Gulf.

American Strategic Culture

Any consideration of war participated in by the United States must be prefaced by noting the uniquely American attitude regarding the use of military force. This attitude is a composite of a number of almost paradoxical tenets, which makes it virtually impossible for a potential adversary to read whether the United States will respond to aggression with military force. The North Korean invasion of South Korea in 1950, the North Vietnamese offensive in 1970 and the invasion of Kuwait by Iraq in 1990 are each examples of the misreading of our intentions by an adversary attempting to gauge the "rational calculus" of waging war.[4]

Perhaps the most basic component of our strategic culture is the dislike we hold for the use of the military instrument. We have built into our laws guarantees that our own military will never be used against us, and have historically opposed the use of our military against others. Our presidential elections are

replete with instances where the candidate promising to keep us out of a war, or get us out of the war we our in, is the candidate that gets elected. Our military interventions in World War I and World War II were each preceded by lengthy and contentious debate. Anti-war sentiment was prominent as well during the Korean War and the Vietnam War. Indeed, public opinion polls conducted following each of these major conflicts indicate that a majority of Americans viewed our involvement as a mistake.[5] Even the polls taken on the eve of Operation Desert Storm indicated that America was deeply divided over whether we should wait to see if economic sanctions would work before turning to the military instrument.[6]

A second fundamental component of our culture is our commitment to individual freedom and human rights. During the Cold War, our containment policy was complicated by our discomfort over supporting military dictatorships that routinely ignored basic freedoms, and occasionally violated human rights. The continuous debate over military and economic support for El Salvador is a prominent example of this sentiment. The public relations blitz conducted by Kuwait preceding Operation Desert Storm, which included the reporting of both true and concocted human rights violations by Iraq, targeted this component of our culture to rally American support for the commitment of U.S. forces.[7]

A related component is our concern that if we use the military instrument, the cause must be just. We reject the

Bismarkian concept that military force is simply one of several options to further national self-interest, and insist that such force be used for a high moral purpose.[8] The analogy employed by President Bush that portrayed Saddam Hussein as another Hitler was an attempt to justify to himself and the American public that committing U.S. forces in the Gulf was not over oil, but morality.[9]

Our insistence that individuals responsible for war crimes be held accountable is entirely consistent with this strategic culture. Our intervention was presumably predicated upon a consensus that the conduct of our opponent could not be tolerated, and that economic and diplomatic persuasion to abide by the rules was to no avail. Holding our adversary responsible for any war crimes committed should be considered an integral component of this intervention.

This component of a war strategy is complicated, however, by the remaining tenet of our strategic culture. Americans have limited tolerance for prolonged involvement in external affairs. We favor a quick resolution of conflict so that our attention can return to our own economic interests. The model for this American way of war is the overwhelming use of military power to defeat the enemy and the expeditious return of our forces. Operation Desert Storm was a classic success story for our strategic culture in this regard. The 100 hours ground war with extremely low casualties resulted in a public opinion poll that gave the highest approval rating ever for a President.[10]

Prosecution of war criminals, assuming that one is willing to afford the accused minimum due process, kes time. It requires collection of information, formally charging specific individuals, and then conducting lengthy and expensive trials. Nevertheless, just as our tolerance for prolonged domestic proceedings has grown when the case is shown to have merit, so too can America's patience for war crimes proceedings mature. The key to such acceptance involves educating the public concerning the constraints of international law on the conduct of parties to a conflict.

International Law of War

The general principles of the law of war attempt to limit the suffering caused by conflict through affording certain protections to combatants and noncombatants. To that end, concepts of necessity, proportionality and humanity form the basis for a series of legal standards.[11] The principle of necessity requires that force be directed to achieve a legitimate objective. Proportionality imposes a limit upon the degree and kind of force that can be used. Humanity requires that the force be discriminating in terms of victims, suffering and destruction. Each of these concepts attempt to accommodate the tension between the need to defeat the enemy and a concern for the victims of war.

Specific standards for participants in a conflict are derived from the customary practices of nations and international agreements.[12] The customary standards are the constraints which, due to their general acceptance, have become a part of customary international law. Because of the vagueness inherent in this behavioral model, as well as the desire to proscribe more humanitarian constraints, the evolution of the law of war has been toward documenting the rules of war in international agreements.

International agreements include treaties and conventions that codify the existing rules of customary law and impose new standards for future conflict. Both customary international law and those portions of international agreements which are considered to be codifications of such are binding upon all nations, whereas international agreements which proscribe new standards are only binding upon those nations that formally ratify that particular treaty or convention.

The motivation behind each of the major law of war agreements has been a pacifistic and humanitarian response to the excesses of previous conflicts.[13] The two most significant are the Hague Rules which followed the Civil and Crimean wars, and the Geneva Conventions which followed the Second World War. In general, the Hague Rules proscribe the means and methods of warfare, and the Geneva Conventions provide protection for the victims of war. Two other agreements of note concern the prevention of genocide

(the "Genocide Convention") and the protection of cultural property ("1954 Hague").

The United States, its Coalition partners and Iraq were each bound by either custom or signature to the majority of the provisions of these international agreements.[14] While the U.N. Coalition forces scrupulously adhered to these standards, Iraq demonstrated an almost total disregard for these rules in pursuing its conquest of Kuwait.[15]

War Crimes by Iraq

In addition to its violation of the U.N. Charter's precept prohibiting of the use of force against the territorial integrity of a sovereign state, Iraq's conduct during the occupation of Kuwait and hostilities with the U.S.-led Coalition included egregious violations of the law of war. As documented in the Department of Defense's Final Report To Congress, these violations encompassed the illegal taking of hostages, the illegal treatment of civilians in occupied territory, the failure to take required actions to protect Iraqi property and citizens, and the illegal treatment of prisoners of war.[16]

Hostage taking by Iraqi forces included taking Kuwaiti and third-country nationals in Kuwait as hostages and conducting forcible deportations of these individuals to Iraq; taking foreign nationals in Iraq as hostages and forcibly transferring these individuals; and forcing Kuwaiti and other foreign

nationals to serve in the Iraqi armed forces.[17] The taking of hostages is prohibited by the Geneva Conventions.

During its occupation of Kuwait, Iraq violated the Genocide Conventions though acts designed to eliminate the Kuwaiti national group, the Geneva Conventions regarding the treatment of civilians, the Hague Rules regarding the protection of public and private property, and 1954 Hague regarding cultural property. The apparent intent of Iraq was to disavow its status as an occupying power and instead claim Kuwait as part of Iraq, in the process eradicating any historical evidence that Kuwait had previously existed as a sovereign state.[18]

Iraq violated the Genocide Convention through activities that included the systematic torture, murder, rape and deportation of Kuwaiti citizens. Public records were removed or destroyed, and Kuwaiti identification cards and licenses were revoked and replaced with Iraqi credentials.

Iraq violated the Hague Rules and 1954 Hague through the systematic confiscation of private, public and cultural property. Such confiscation was motivated by its desire to erase any record of Kuwait and the opportunity to provide consumer goods for Iraq, as well as the tolerance of illegal pillage by members of its forces. The Hague Rules were also violated by Iraq's wanton destruction of Kuwaiti's public property by igniting explosive charges installed at the Kuwaiti oil wells immediately prior to the Iraqi forces taking flight.

Iraq violated the Geneva Conventions by denying the civilians in Kuwait the basic necessities for survival, including food and medical care. Medical personnel, equipment and supplies were deported to Iraq. Citizens suspected of committing offenses were summarily executed, and collective punishment against families was imposed for suspected assistance to the Kuwaiti resistance. These violations continued up to the last day of the occupation with a number of civilians murdered, presumably to eliminate them as possible witnesses to the violations.

Both the Hague Rules and Geneva Conventions proscribe that the application of force be limited to legitimate military targets, and that collateral damage and collateral civilian casualties be kept to a minimum. The attacker and defender share responsibility for abiding by these rules, with the defender bearing the responsibility of not intentionally putting its protected property and civilian population at risk. Iraq repeatedly contravened these provisions by placing military equipment in heavily populated areas, and near mosques, schools and hospitals. Iraq also elected not to employ air-raid procedures to protect its population, and employed hostages as shields for military targets.[19]

In addition, Iraq violated the Geneva Conventions by not affording the U.S. and Coalition personnel captured by Iraq the protection required for prisoners of war. They were incarcerated at a military target, experienced food deprivation, and were provided inadequate protection from the cold. These prisoners

were also forced to make propaganda statements, were denied the right of correspondence, and most alarming, were subjected to torture and physical abuse.[20]

Individual and Command Responsibility

Criminal responsibility for these war crimes lies with both the individual perpetrators and their senior leadership.[21] If the military commander actually orders the offense to be committed, then that person bears individual responsibility and is charged as a principal for the commission of the offense. If the military commander knew that offenses were being committed by perpetrators under his command, and failed to take action to halt these actions as well as prevent further incidents, that person bears "command responsibility" for the *offense* committed.[22]

Saddam Hussein ordered the invasion of Kuwait and bears individual responsibility for a crime against peace under the U.N. Charter. He and other members of the military high command exercising command and control over the Iraqi forces either directly ordered, or were aware of and failed to stop, the systematic violations detailed above.[23] Accordingly, he and his subordinate commanders bear individual and command responsibility for the multiple offenses committed in taking hostages, occupying Kuwait, failing to protect Iraqi civilians and property, and mistreating prisoners of war.

Although there were several teams of investigators

documenting these violations of the law of war, many of which were "grave breaches" which under the U.N. Charter require criminal prosecution by the custodial nation or extradition to a nation willing to pursue prosecution, war crimes trials were not incorporated into the war termination.[24]

War Termination

One of the most problematic aspects of the use of military force to secure political aims involves the question of how to compel the enemy to surrender, or absent that at least negotiate an end to the conflict.[25] The most famous war crimes trials followed the total surrender of our opponents in World War II, so that the Alliance Powers were in a position to dictate terms.

The political reality is that the conflicts in which we have subsequently been involved, and in which we can expect to be involved in the future, will be conflicts with limited objectives. Just as in Korea and Vietnam, our political aim in the Gulf war was to restore the status quo anti bellum, not the total defeat of the enemy.

Future conflicts will likely encompass objectives to cause hostilities to cease, restore previous borders, return elected governments to power and protect the lives of American citizens. The frustration expressed in General MacArther's statement that "there is no substitute for victory" ignores the geo-political reality that it is unlikely that we will again pursue the

unconditional surrender of our opponent.[26] As a consequence, requiring the senior leadership of our adversary to turn themselves over for prosecution may prove extremely problematic when attempting to negotiate rather than dictate the terms for peace.

Nevertheless, criminal prosecution is the most potent of a variety of means to sanction war crimes, and our nation should remain focused upon this aim from military intervention through war termination if we are truly concerned with furthering world peace. The calculation of the cost-benefit aspects of this effort will determine whether such prosecutions will be pursued up to the head of state, or be confined to some intermediate level.

Sanctioning War Crimes

Like all legal constraints, compliance with the myriad obligations imposed by customary law and international agreements is attendant upon sanctioning violations of these tenets. Such sanctioning has traditionally involved reprisals, international condemnation, reparations and criminal prosecution.[27]

An absurd vestige of customary international law is the principle of reprisals. In essence, if one side to the conflict violates the restraints of international rules, the other side may respond with conduct in violation of the international rules as a reprisal. Although U.S. regulations recognize the viability

of reprisal, authority to order such is limited to the National Command Authority, and it is almost certain that such authority would never be exercised. This alternative is simply irresponsible and unbecoming for a world leader, particularly if that leadership is intended to further humanitarian principles in a new world order.

A more acceptable sanction is publicizing the violations to invite condemnation by the world community. Unfortunately, such pronouncements may prove an ineffective deterrent if the violator is unconcerned with the opinion of the international community. For example, while Saddam Hussein was mildly concerned with manipulating the media to sustain approval amongst the general populous of the other Arab states, neither international nor official U.N. condemnation of his and his military's actions served to dissuade the Iraqis from their continuous violations of the requirements of international law.[28]

Another sanction is the requirement that the offending nation be forced to pay reparations for the injuries that it has caused. One difficulty with reparations is that although damage to property is easy to assess, it is both difficult and repulsive to ascribe a dollar value to an innocent's life. In addition, once a nation has exhausted its treasure in a losing war effort, it is rarely in a position to be able to pay compensatory damages. Further, the imposition of additional financial hardship on a nation attempting to rebuild indiscriminately punishes the common citizen as well as the individuals and commanders responsible.

Nevertheless, this option should be pursued, as it serves to penalize the offending nation while off-setting a portion of the harm to the victims of the war. U.N. Security Council Resolution 686 mandated that Iraq "{a}ccept in principle its liability for any loss, damage or injury arising in regard to Kuwait and third states, and their nationals and corporations, as a result of the invasion and illegal occupation of Kuwait", which Iraq was ultimately required to concede as a peace term.[29]

The most effective means for sanctioning war crimes, however, is the prosecution of the offenders. Such prosecutions reaffirm the international standards, punish the specific violators and, perhaps most important, serve as a warning to deter others from ignoring such standards in the future. If the international standards are to truly govern conduct during war, then those accused of violating these standards must be held accountable.

Tribunals for War Crimes

The prosecution of war criminals is complicated in that there is no international tribunal readily available to try these accused. The requirement that each nation try its own personnel may be the preferred method of adjudication, but this has historically worked only when that nation is concerned with the rule of law. The U.S. has incorporated the law of war into its military penal code, and routinely tries offenders in military judicial proceedings. The requirement that Germany try its own

war criminals following World War I resulted in sham proceedings which mocked the international rules.[30] El Salvador's recent amnesty to military officers convicted of murdering foreign ministry personnel confirms the limitations of external influence on domestic proceedings.[31] Consequently, the example that the U.S. has set stands in marked contrast to the record of most nations.

The International Court of Justice established under the U.N. Charter is a forum created to resolve disputes between nations. It is painfully inefficient, and requires both parties to the dispute to consent to its jurisdiction before it may consider the case.[32] While there is precedent for this court adjudicating reparations claims, it is neither available nor appropriate for trying war criminals.

Therefore, the most plausible option is the creation of an ad-hoc tribunal to try the offenders following the cessation of hostilities. After World War two, there was no neutral nation willing to assume the burden of conducting the prosecutions of the hundreds of war criminals identified. Hence it was left to the members of the alliance to conduct the trials, with the consequence that these forums were unfairly accused of dispensing "victor's justice".[33] A Coalition forum established to try Iraqi offenders would have invited similar accusations.

To avoid this appearance of impropriety, and reaffirm the international community's interest in complying with the law, these tribunals must become routinely created pursuant to the

directives by the U.N. that authorize military intervention. A U.N. tribunal with full participation by judges from all Security Council members would ensure legitimacy in the eyes of the world community. Such action would also serve the dual purpose of accommodating the legal goal of imposing accountability and the political goal of fostering humanitarian principles in the new world order.

War as a Political Instrument

As the renowned Clausewitz recognized, the application of military force must always be guided by political aims.[34] These policy considerations guide the resources to be expended, the military objectives to be attained and the end state to be negotiated.

The prosecution of offenders for violating the law of war should be considered the application of a judicial instrument guided by these same political concerns. Such action not only penalizes the guilty, but reaffirms the primacy of law in international affairs. For this reason, the U.S. should routinely include such war aims in every situation where it is assessing whether to employ military force under its world leadership role. Only then can the U.S. expect that its employment of force will have more than a temporal impact on the world order.

The U.S. political aims in the Gulf War were the withdrawal

of all Iraqi forces from Kuwait, the restoration of Kuwait's legitimate Government, establishing security and stability for Saudi Arabia and the Persian Gulf, and the protection of the lives of American citizens abroad.[35] Holding Saddam and others responsible for the war crimes committed was never identified as a political aim of the war. In addition, while the U.N. Security Council Resolutions condemned Iraq for its actions, they failed to articulate a foundation for criminal prosecution as a sanction for violating the law of war.

As a consequence, military objectives focused upon expelling Iraqi forces from Kuwait.[36] Once this end state appeared to have been achieved, the decision was made to halt the air assault and permit the remaining Iraqi forces to flee. This denied the Coalition the opportunity to achieve custody over these forces for investigation and prosecution of those individuals identified as having perpetrated war crimes.

In the same vein, the peace terms presented by General Schwarzkopf omitted any demand that the commanders responsible for war crimes be turned over to the U.N. forces for prosecution. Instead, the ten points focused upon ceasing hostilities, releasing prisoners, restoring citizens and property to Kuwait, and disarming military weapons. The only sanction for the violation of international law was the reparations provision previously noted.[37]

As a result of this failure to attend to appropriate sanctioning, those individuals and their commanders responsible

for extremely serious violations of international law have been awarded de facto amnesty for their crimes. Equally significant, Saddam is certain to re-emerge as a threat to the stability of the region, and the warnings of war crimes trials currently being directed against Bosnia have a distinct lack of credibility.

Conclusion

The Gulf War could have served as a "defining event" to prove to the world that grave breaches of the law of war would not go unpunished. Although ensuring accountability for war crimes accords with our culture's preconditions for employing military force, our political leadership failed to include such objective as a war aim in the war in the Persian Gulf. As a consequence, the U.S. missed an opportunity to confirm the primacy of law in a new world order. This error must not be repeated if the U.S. truly desires to lead this world toward being a community of nations joined by the shared values enunciated in the National Security Strategy.

Endnotes

1. National Security Strategy of the United States, (Washington, DC: the White House, January 1993), p. 21.

2. Ibid.

3. See e.g., John F. Burns, "Balkan War Trial in Serious Doubt," The New York Times, 26 April 1993, p. A:9, where a lawyer working for the commission appointed by the U.N. expresses doubt that senior commanders will be prosecuted for war crimes.

4. " To discover how much of our resources must be mobilized for war, we must first examine our own political aim and that of the enemy. We must gauge the strength and situation of the opposing state. We must gauge the character and abilities of its government and people and do the same in regard to our own. Finally, we must evaluate the political sympathies of other states and the effect the war may have on them." Carl Von Clausewitz, On War, M. Howard and P. Paret eds. (New Jersey: Princeton University Press, 1976), p. 585-6.

5. William C. Adams, "Opinion and Foreign Policy," Foreign Service Journal, May 1984, p. 32.

6. Paul Clancy, "Poll: Nation Split on Iraq War", USA Today, 3 December 1990, p. 1.

7. Michael Hodges and Peter Sigler, "Escapees Say Iraqis Kill Babies, Torture", The Washington Times, 6 November 1990, p. 9.

8. See generally, Erich Eyck, Bismark and the German Empire (New York: Norton and Co., 1964) for an overview of this German statesman who did not hesitate to apply any instrument of national power, including military force, in pursuit of his territorial goals.

9. For the position that military intervention in the gulf was predicated upon the Administration's concern over access to oil, see Judith Miller and Laurie Mylroie, Saddam Hussein and the Crisis in the Gulf (New York: Random House, 1990), pp. 216-230.

10. Sharon S. Johnson, "Poll: Bush Backed by Record 91%", USA Today, 1 March 1991, p. 1.

11. See generally, Colonel Gerald Draper, "Rules Governing The Conduct of Hostilities - The Laws of War and Their Enforcement," Naval War College Review, November 1965, pp. 22-44.

12. Ibid.

13. See generally, Richard R. Baxter, "The Law of War," Naval War College Review, January 1957, pp. 39-58.

14. See generally, U.S. Dept. of Defense, Conduct of the Persian Gulf War, Final Report to Congress (Washington: 1992), Appendix O.

15. See generally, U.S. Congress, Senate, Committee on Foreign Relations, Persian Gulf: The Question of War Crimes, Hearings (Washington: U.S. Govt. Print. Off., 1991 .

16. Final Report, Appendix O.

17. Ibid., pp. 4 - 5.

18. Ibid., pp. 6 - 7.

19. Ibid., pp. 9 - 16.

20. Ibid., pp. 19 - 20.

21. See generally, Colonel William G. Eckhardt, "Command Criminal Responsibility: A Plea For a Workable Standard", Military Law Review, Spring 1982, pp. 1 - 34.

22. The standard of actual knowledge was articulated for domestic proceedings in the courts-martial of Captain Ernest Medina, who was acquitted on 22 September 1971 of charges alleging command responsibility for misconduct during the My Lai massacre. Although The Commander's Handbook on the Law of Naval Operations indicates that command responsibility also exists if the commander "failed...to take reasonable measures to discover and correct violations that may have already occurred", this should be interpreted as referring to a charge of dereliction of duty and not command responsibility for a subordinate's misconduct. U.S. Navy Dept., NWP 9 (Rev. A), FMFM 1-10, Commander's Handbook on the Law of Naval Operations (Washington: 1989), p. 6-1.

23. Since both knowledge of the misconduct and the opportunity to exercise control over it are required for command responsibility, had the effectiveness of the air campaign precluded the senior leadership in Iraq from exercising command and control over the troops in Kuwait, these individuals could not be held criminally liable for the crimes of their subordinates. This was the defense put forth by General Yamashita at his war crimes trial for the conduct of Japanese troops in the Philippines during World War II. See generally , Richard L. Lael, The Yamashita Precedent, War Crimes and Command Responsibility (Delaware: Scholarly Resources Inc., 1982).

24. Article 129 of the U.N. Charter provides that each nation is under an obligation to bring all persons who commit grave breaches before its own courts or to extradite them to a country that will.

25. Fred Charles Ikle, Every War Must End (New York: Columbia University Press, 1971), p. 17.

26. James L. Stokesbury, A Short History of The Korean War (New York: William Morrow and Co., 1988), p. 126.

27. See generally, Draper.

28. U.N. Security Council Resolution 670 placed Iraq on notice that it was bound to comply with the Geneva Conventions and would be liable for the grave breaches committed by it.

29. Steve Coll and Guy Gugliotta, "Iraq Accepts all Cease-fire Terms", The Washington Post, 4 March 1991, p. 1.

30. Baxter, p. 48.

31. "El Salvador Frees 2 In Murders of Priests," The New York Times, 2 April 1993, p. A:8.

32. Commander's Handbook, p. 4-2.

33. This is the theme of Lawrence Taylor, A Trial of Generals (Indiana: Icarus Press, 1981).

34. " ... war is simply a continuation of political intercourse, with the addition of other means. We deliberately use the phrase 'with the addition of other means' because we also want to make clear that war in itself does not suspend political intercourse or change it into something entirely different... Its grammar, indeed, may be its own, but not its logic." Clausewitz, p. 605.

35. Harry G. Summers, On Strategy II, A Critical Analysis of the Gulf War (New York: Dell Publishing, 1992), p. 162.

36. General H. Norman Schwarzkopf, "Schwarzkopf Tells of the Strategy Behind Operation Desert Storm", Retired Officers Association National Security Report, April 1991, p. 32.

37. Coll and Gugliotta.

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