SHANGHAI
International Conference on Social Science

Proceedings of Shanghai International Conference on Social Science (SICSS 2011)

17-20 August 2011

ISBN 978-986-87417-0-6

http://www.shanghai-ic.org/

Click Here To Enter

Organized by
Higher Education Forum

Cooperated with
Management Research Review
Journal of Emerging Technologies in Web Intelligence
Antiqua
International Journal of Manpower
Banking Magazine

International treaties in practice. US-Hungarian relations in the 19th century citizenship law

Norbert Varga

PhD et PhD
associate professor
University of Szeged, Faculty of Law
Department of Hungarian Legal History
Szeged, Hungary
vargan@juris.u-szeged.hu

Abstract
International treaties are important sources of citizenship law. The Austro-Hungarian Monarchy concluded treaties with the USA, Switzerland and Serbia, the significance of which was demonstrated in practice. The significance of international treaties was inherent in the fact that the debates arising from the legal relationship of citizenship could be settled faster and with fewer conflicts.

The international treaties in the 19th **century**

The first legislative acts to regulate citizenship law in Hungary appeared in the 19th century. International treaties were an important source of citizenship law. In the period examined, the Austro-Hungarian Monarchy concluded treaties with the USA, Switzerland and Serbia, the significance of which was proved in practice. The only states with respect to which exceptions could be made from under the rules of the citizenship act were those with which the monarchy had concluded international treaties. On the basis of reciprocity, the scope of benefits was clearly defined, which fundamentally concerned the rights and obligations constituting the essence of the citizenship status. The importance of international treaties was manifested in the fact that disputes arising out of citizenship status could be resolved quicker and without conflicts.

The examination of the legal practice, often carelessly ignored in the course of research in the field of constitutional history, can supply evidence in support of some theoretical theses. In my paper, I intend to illustrate the system of citizenship law that was enforced in the second half of the 19th century with the use of specific legal cases. It is only with the joint examination of the practice and the theory that we can obtain a comprehensive image of the implementation of the act and the process of its enforcement in practice.

In the Minister of the Internal Affairs section of the Hungarian National Archives, there is a significant amount of documents concerning citizenship law the detailed analysis of which no-one has undertaken to date. These documents include some that concern American citizens; however, these have never been described and analyzed in detail so far.

In the Hungarian constitutional situation of the period (following 1867), the evaluation of the state treaties was somewhat problematic.[1] The monarch had the right to conclude state treaties on the basis of the royal prerogative in the field of foreign affairs; however, in practice it was not the king who signed these but a person authorized for this purpose. By concluding a state treaty, the monarch did not create law, only incurred an obligation with respect to the given state, with Parliament to pass new legislation in certain cases. A state treaty only became enforceable in this form.[2] State treaties had to be enacted whose provisions would otherwise have been subject to legislation. This was the only way to establish obligations binding the citizens. In case of such state treaties, the parties could stipulate that the ratified treaty would only enter into effect once accepted by the Parliament.[3] In case the state treaty only established obligations for the authorities of the given country, and it did not affect the constitution, laws or territory of the given state, or the relationship of its members to the state, implementation by way of a government decree was sufficient. State treaties, however, also had to be promulgated in these cases. Ferdinándy correctly stated that “international treaties only become a source of law by the legislative act of the state, i.e. when enacted or promulgated by way of a decree.”[4] State treaties could only function as sources of law in this case. Eöttevényi was also of a similar opinion when he stated that “enactment renders the state treaty, which is an international agreement concluded between two or several states and regulating a specific area, binding upon every citizen.”[5] In this respect the positions of Kmety and Ferdinándy were the same.[6] State treaties had

no separate official collection. The consequence of enactment was that the rules applicable to the promulgation of acts of Parliament also had to be used for international treaties.[7]

The conclusion of state treaties consisted of several important steps. Signing by the authorized representatives of the given state was preceded by negotiations. State treaties are usually referred to on the basis of their dates of signing. The next step is that the treaty was ratified by the given state, which usually took place by way of passing a bill for the enactment of the treaty. In the course of the parliamentary debate, delegates were able to express their opinions; however, they had no power to unilaterally change the phrasing of the treaty. This can also be observed in the course of the parliamentary debate of treaties concerning citizenship law. The last step was the exchange or deposition of the instruments of ratification, of which a protocol was drawn up.[8] Szászy discusses the system of Károly Csemegi, whereby state treaties can be divided into three groups from the point of view of parliamentary consent. In the first group are treaties whose subject is of legislative nature, and prior to ratification, for the purpose of enactment, have to be communicated to the Parliament. In the second group we find treaties that are of administrative nature, and in the third those which are only communicated to the legislature for acknowledgement after approval.[9]

Under a state treaty concluded, the subject of international law was not the monarch but the state represented by him. From this perspective it is an important fact that the Austro-Hungarian Monarchy is the constitutional construction of two sovereign states. In accordance with Act 12 of 1867, however, there were common issues with respect to which state treaties could only be concluded jointly with respect to Austria and Hungary. In this case the legal subject was the Austro-Hungarian Monarchy. In cases of mutual interest, the situation was different as the international legal relationship was concluded between the Austrian, the Hungarian and a third state, by way of what was practically a trilateral international treaty in which Austria and Hungary were represented, pursuant to Act 12 of 1867, by the common minister of foreign affairs. The rules discussed in connection with common issues had to be followed also in case of state treaties the subject of which did not qualify as shared or common interest. Citizenship law also fell in this latter category.[10]

Article 8 of Act XII of 1867 authorized the common minister of foreign affairs to conduct the negotiations, with the consent of the governments of both parties. The law provided that these treaties had to be communicated to Parliament. According to Károly Csemegi, the abovementioned provision of the Act on the Compromise did not apply to issues of minor significance which "belong to the lowest administrative order, and neither country wishes the treaties concerning them to be submitted to the legislature."[11] On the basis of the above we can conclude that the Act on the Compromise did not provide detailed formal rules to be followed in the course of the conclusion of international treaties, the system of which was therefore established by practice.

After the Compromise it happened sometimes that Austria and Hungary acted jointly even if the subject of the treaty was an autonomous and not a common issue. This practice was suitable for weakening Hungary's status in the international evaluation, and also to reinforce the notion of the Gesammstaat on the part of Austria.[12]

Naturalization treaty in 1870

One of the most important antecedents of our citizenship law was the state treaty concluded on 20 September 1870 between the United States of America and the Austro-Hungarian Monarchy on settling the citizenship status of immigrating individuals.[13]

In most states of Europe the question arose whether persons naturalized in the USA have to fulfil their defence obligations upon return to their original country. The Union adopted a new policy in this respect from 1859, which is usually associated with the name of Lewis Cass, secretary of state. The position of the United States was that in case a foreign national was naturalized, then all ties with that person's mother country were severed, and if that person (he experiences a new political birth) returned to his home country as an American citizen. The US government did not differentiate between native-born and naturalized American citizens, and protected the rights of the latter similarly to the those of native-born Americans. What they wanted to achieve is that by way of naturalization the earlier citizenship and all related obligations should cease. The USA accepted *expatriation* as a basic principle, which meant that persons concerned gave up their earlier citizenship.[14]

The need for settling this issue did also arise with respect to Hungary and Austria, and for this

purpose, the two parties concluded an international treaty. Due to the deficiencies of Hungarian statutory citizenship law, the opportunity for the conclusion of the treaty was welcomed, "because in those days when in the field of citizenship law […] there was much confusion, and it was practically the wish of the public that the methods of the acquisition and loss of citizenship be set forth, this treaty represented the first step with which we were able to entangle ourselves from the web of legal uncertainties."[15]

It was Vilmos Tóth, minister of internal affairs, who submitted the bill in the subject of the citizenship of immigrants to the United States.[16] In the course of the debate on the treaty of 1870, the central committee emphasized that in the drafting of international treaties in the future, the requirements of the Hungarian language should be taken into consideration, because the text of the treaty did not satisfy the requirement of public law. It was also underlined that the Austrian-Hungarian citizenship mentioned in the treaty did not exist.[17]

The referee of the central committee, Ágost Pulszky, requested that the text of the treaty be divided into parts.[18] Subsequently, the debate on the details of the treaty could be commenced. Pulszky justified the need for the treaty by way of reference to the fact that all European states have already concluded such a treaty with the USA. He emphasized the fact that the word "subject," inherited from the old "feudal" period, was replaced by the "concept of citizenship, in line with more recent theories of the state and the right of free movement."[19]

The phrasing of the treaty was criticized by József Vidliczkay for the following reasons. In his opinion, the treaty did not comply with the requirements of public law. In the Monarchy, the principle of parity was enforced. It was correctly stated that the two states of the Monarchy did not constitute a unified state under public law. For this reason, he disapproved the use of the reference to Austrian-Hungarian citizenship, which could be found in the treaty.[20] He found it unacceptable that the treaty refers to citizens of the Austro-Hungarian Monarchy. In his opinion, it would be more correct to use the expression "citizens of the two states of the Austro-Hungarian Monarchy." This would better express the relationship between the two countries under public law. He proposed that the phrase "became citizens of the Austro-Hungarian Monarchy" in the first article be replaced with the following: "became citizens of one of the two states of the Austro-Hungarian Monarchy."[21] According to the minister of internal affairs, the expression "citizens of the Austro-Hungarian Monarchy" did not oblige the government to act according to what appeared in practice, since "citizens of the provinces beyond the Lajta River, if they wished to become Hungarian citizens: they have to abide by the same rules as the citizens of any foreign state."[22]

In connection with joint citizenship, Kálmán Tisza declared that they will avoid this phrase in the bill to be drafted. Those terms have to be used that are in compliance with the requirements of Hungarian public law. He thought it particularly harmful from the point of view of international relations, since the idea of a unified monarchy could be gathered from it. He did not vote against it, but made the following remark: "I will consider it my duty never again to accept the treaty that proclaims to the world in the phrases it uses the subordinated position of Hungary."[23]

According to Ignácz Helffy, one could talk about a unified monarchy because of the common issues. He considered the passing of the law important because many people circumvented the laws by way of immigration. In his opinion one could not turn a blind eye to the issue that citizens are immigrating because they committed crimes or for political reasons. In his opinion, political crimes could also be understood as being covered by the second part of the treaty. "The naturalized citizen of one part, having returned to the other part, shall remain subject to investigation and penalty for the acts committed in and under the laws of his former home country."[24] In his opinion, it was sufficient penalty if one had to leave his country. Nobody can be deprived of the possibility of returning one day. The referee of the committee argued that extradition must be touched upon only so far as it concerned citizenship. According to Pulszky, no state could allow not to punish a person who, after obtaining citizenship in another country, returns to his former home country where he committed a crime. This would be the "abdication" of sovereignty.[25]

Sándor Csiky also commented on the proposed law. In his opinion, it was not acceptable that someone should not be punished for committing an act against the laws, even if that person subsequently acquired citizenship in another country, and then returned or travelled through his original home country. In his interpretation of the treaty this would only be the case if the returning citizen settled down. In this case,

calling to account could not be dispensed with.[26] According to Pulszky, it cannot be the aim of any state to exempt someone from under a penalty, except in case it was for political acts. This was clearly set forth in the text of the treaty.[27]

An important issue was raised by Ede Horn. Under the treaty, if a person naturalized in the USA returned to Hungary, he would become a Hungarian citizen. This raises the question as to whether the foreign citizenship could be kept in this case. Would the American citizenship of such persons remain in effect for the period preceding the acquisition of Hungarian citizenship. He illustrated this with the example of the person concerned getting married in the United States, which marriage is not recognized by the Hungarian authorities. The problem arises if the individual subsequently becomes a Hungarian citizen and keeps his American citizenship, because in this case the marriage would qualify as valid. Otherwise, the same would not be the case for marriages concluded in the USA. The minister of the internal affairs answered this question, who stated that no person can be the citizen of two states at the same time.[28] Pulszky added to this that the person concerned could only re-acquire his Hungarian citizenship after giving up his American citizenship.[29]

The treaty desired to settle the citizenship of individuals leaving the territory of the Monarchy, as well as of persons arriving from the United States. Naturally, even before the first citizenship law was passed, there had been conditions under which citizenship could be acquired and lost. With the state treaty they wished to exclude the possible negative consequences that may arise from dual citizenship. In order to obtain the citizenship of the states that signed the treaty, the stipulated conditions had to be satisfied, according to which the person concerned had to reside, without interruption, for five years on the territory of the other country.[30] During this time, the applicant could be the naturalized citizen of the given state. Of course, the principle of reciprocity was also enforced in this case, but a peculiar situation emerged when a person of American citizenship resided on the territory of either of the countries in the Austro-Hungarian Monarchy. The monarchy had no dual citizenship, and consequently, the individual received either Austrian or Hungarian citizenship.[31] At the acquisition of citizenship, no special significance was attributed to the mere declaration of the intention of naturalization, and consequently it did not create the possibility of automatic naturalization.[32]

In the case for the declaration of the Hungarian citizenship of Rosenfeld Izrael Mayer, the minister of the internal affairs examined from what point in time the person concerned lived in the United States. The five years of residence required by the law had to be proved.[33] In another citizenship case, the authenticity of the passport issued had to be verified, in the interest of which a protocol was drawn up. The personal identity of Fábián (Frigyes?) Klein also had to be clarified. In this case, Menyhért Némethy, the registrar of the Israelite religious community testified that he had known the person concerned, who moved to America with his father. He issued the birth certificate, which was necessary for the travel. The name Fábián was acquired as a Christian name, while Ferenc was his name at school, which is the equivalent of the Hebrew version for Fábián. He considered it likely that the name Fred was adopted in the USA. The chief municipal clerk, József Debreczenyi, also made a statement in this case to the effect that he had not issued any documents to the person concerned. János Jesztrebszky, municipal counsellor, also said the same. The certificate of naturalization was obtained in Pennsylvania.[34]

The other reason for obtaining a different citizenship was often for the person concerned to avoid criminal liability or the fulfilment of obligations toward the state. A situation could occur when the naturalized person returned to his earlier home country where he had committed a crime before immigrating for which he had to face punishment. Upon his return the person concerned was subject to the laws of his earlier citizenship, except when the given crime had been subject to statutory limitation or any circumstance precluding punishability emerged. A special problem was represented by the situation when someone left the territory of the Austro-Hungarian Monarchy in the hope of avoiding his defence obligations.[35] The state treaty lists three cases when investigations had to be launched for calling into account. The first among these was if the Austrian or Hungarian citizen left the territory of the country while in conscription service. The second case was when someone immigrated during his time of service or a fixed-term leave. Finally, if someone as an officer or private soldier on reserve duty left the country, but only if that person had previous received his mobilization order or a public call to duty has been announced, or war was declared. A former citizen of the Austro-Hungarian

Monarchy could not otherwise be forced to military service subsequently, and no procedure could be launched against him on the grounds of failure to meet defence obligations.[36]

In most cases the problem related to the failure to meet defence obligations that emerged. In the cases of Józsué Zsupnyik, Gyula Teplanszky and Salamon Szobel, the consul wrote the following in his letter. Zsupnyik acquired American citizenship, but after returning to Hungary his documents were seized and he was called into account for failure to meet defence obligations. It turned out that he had left the country at the age of 17, after which he obtained American citizenship in 1888.[37] He requested the return of his naturalization documents and also desired to have diplomatic protection. The name of Gyula Teplanszky was also included in the list of absentees.[38] He had not been drafted before his immigration; nevertheless he was declared to have escaped military service and the minister of defence extended his term of military service by two years. In the case of Salamon Szobel it was also failure to perform defence obligations that caused the problem, the term of which was extended by the minister by one year.[39] Subsequently, he was deprived of his documents.[40] Measures also had to be taken in a forth problematic case. After he immigrated, Mihály Szenyák was naturalized in Pittsburgh in 1887. He wanted to visit his parents in Hungary, when his documents were confiscated. With reference to the treaty of 1871, the consul requested the minister of internal affairs to order the magistrate to return his documents. Could it be proved that the persons concerned were American citizens? The issuance of the American documents of naturalization evidenced that the 5 years required in the treaty have elapsed since these individuals left the country, since that was a condition of obtaining American citizenship.[41]

The same problem arose in connection with another case. In the case of Dávid Reich and Viktor Keller, the minister of internal affairs evoked Articles 1 and 2 of the treaty. In this case the there was suspicion that the American documents of naturalization were forged, which were obtained by the above persons in order to be exempted from military obligations. The two individuals immigrated to the United States in 1877. It turned out from the letter received from the Department of State in Washington, D.C., that the naturalization documents of 1888 were enclosed. The consul in office during the procedure did not know them; however, his predecessor examined the documents issued. The Hungarian authorities withheld the documents, thus preventing them from returning home. The documents would have to be returned for them to be able to prove their authenticity.[42] The consul verified the authenticity of the documents, as a consequence of which it was not regarded as important to supply proof of the five years' residence, since the deeds of naturalization were only issued by the American authorities if the applicant fully satisfied the conditions. The consul notified Baron Béla Orczy, minister of internal affairs. In the letter he declared that the "the above named Reich and Keller are recognized by this consulate as citizens of the United States."[43] The minister of internal affairs also examined in the case of Rudolf Goldberger why he had not fulfilled his military obligations. They tried to find out whether the American deed of naturalization was original.[44] They referred to Articles 1 and 2 of the treaty in consequence of which the question was raised whether the applicant had resided for five years on the territory of the United States of America.[45] The minister of defence declared the individual had attempted to escape military service, but his American citizenship was subsequently proved.[46]

The problem was caused by the fact that an individual who had acquired American citizenship could be called to account for failure to fulfil his military obligations if the individual immigrated when already drafted, was in military service or on leave from, or when his mobilization order was issued, or a public call to duty has been announced, or war was declared.[47]

In accordance with the treaty, the extradition treaty concluded on 3 July 1856 on escaped criminals, as well as the codicil signed on 8 May 1848 on deserters from military and commercial ships, remained in effect.[48]

It was also regulated what was to happen with former citizens who returned to their home countries and applied for citizenship. In case such persons renounced the citizenship they had acquired by way of naturalization, the residency requirement for a certain fixed term was no longer necessary. Upon returning, they could not be forced to re-enter the bonds of the state.[49]

The state treaty was not repealed after Act L of 1879 entered into effect either.[50] For naturalization, the conditions set forth in the act had to be satisfied, from among which the most important was the requirement to reside for five years without interruption on the territory of the

Hungarian state, which provision can also be found in the treaty of 1870.[51] The significance of the state treaty is shown by the fact that even certain provisions of our third citizenship law (Act V of 1957) reached back to it.

---

[1] Molnár, K. *Hungarian Public Law.* Danubia, Budapest, 1929. pp. 36-37. According to Eöttevényi, we can only talk about state treaties in case of an agreement between sovereign states. Eöttevényi, N. O. *Textbook of Hungarian Public Law.* Publication of Vitéz A. Booksellers. Kassa, 1911. p. 21. Faluhelyi, F. *Hungarian Public Law.* Vol. 2. Publication of Karl Booksellers, Pécs, 1926. p. 11. Csarada claims that international treaties are of "as many types as there are interests." Csarada, J. *The system of statutory international law.* Franklin Társulat, Budapest, 1910. p. 24.

[2] Ferdinándy, G., *Hungarian Public Law (Constitutional law).* Politzer and Son, Budapest, 1902. p. 85.

[3] In case of international treaties that were, in accordance with Act XII of 1867, concluded by Austria and Hungary, the consent of the Hungarian Parliament and the Austrian legislative body had to be obtained. Ibid 85.

[4] Ferdinándy, 1902. p. 86.

[5] Eöttevényi, 1911. p. 22. In case of international treaties of legislative subject, ratification by Parliament was unconditionally required also according to Károly Csemegi. Edvi, I. K. and Gyomai, Zs., *The works of Károly Csemegi. III. Material criminal law. IV. The law of criminal procedure.)* Vol. 2. Franklin Társulat, Budapest, 1904. p. 242.

[6] Ferdinándy, 1902. p. 87.

[7] Eöttevényi, 1911. p. 23.

[8] Molnár, 1929. p. 37.

[9] Szászy, I., The role of Parliament under Hungarian public law in the course of concluding international treaties. *Magyar Jogászegyleti Értekezések*, 1932. New series, vol. 24, issue 128, p. 52.

[10] Polner, Ö., *Államszerződés*. In: Márkus Dezső (ed.): Magyar Jogi Lexikon. 1. köt. Pallas Irodalmi és Nyomdai Részvénytársaság, Budapest, 1898. p. 491-492.

[11] Edvi, and Gyomai, 1904. p. 240.

[12] Eöttevényi, 1911. p. 23.

[13] Webster, P., Law of Naturalization in the United States of America and of Other Countries. Fred B. Rothman& Co., Littleton, 1981. p. 341-344., van Dyne, F., *Citizenship of the United States*. Vm. S. Hein Publishing, Rochester, 1904. p. 327-330. The signatory on the part of Hungary was Count Frigyes Ferdinánd Beust Frigyes Ferdinánd, as secret counsellor, chamberlain, imperial chancellor, minister of the reigning family and of foreign affairs. KN. 1871. XVII. p. 27. On the part of the USA it was John Jay who represented the interests of the country, as the Envoy Extraordinary and Minister Plenipotentiar y of the United States of America. This state treaty was promulgated in Decree no. XLIII of 1871. Marschalkó, J., Északamerikai Egyesült-Államok (United States of North America). In: Márkus, D., (ed.) Lexicon of Hungarian Law. Vol. 3. Budapest, 1900. p. 445. Act XLIII of 1871 (on the state treaty concluded on 20 September 1870 with the United States of America for the purpose of regulating the citizenship of immigrating individuals.") Királyfi, Á., The state treaty enacted by way of Act XLIII of 1871. (Reprint from Vol. XII, Issue 7-10 of Jogállam.) Franklin, Budapest, 1913. p. 1-80.

[14] Királyfi, 1913. 1-9. For the study of American citizenship law: Shklar, J. N., *American Citizenship.* Harvard University Press, Cambridge (USA)–London, 1991. p. 1-23., Sinopoli, R. C., *The Foundations of American Citizenship. Liberalism, the Constitution, and Civic Virtue.* Oxford University Press, New York–Oxford, 1992. p. 157-71, Bonwick, C. C., *American Nationalism, American Citizenship and the Limits of Authority, 1776-1800.* In: Minnen, C. A. and Hilton, S. L. (ed.), Federalism, Citizenship, and Collective Identities in U.S. History. VU University Press, Amsterdam, 2000. p. 29-42.

[15] Királyfi, 1913. pp. 11-12.

[16] Nagy I. (ed.), *The journal of the National Assembly summoned for 20 April 1869.* Vol. 16. Printed by the Légrády Brothers, Pest, 1871 (hereinafter: KN. 1871. XVI.) p. 340.

[17] This can be found in Article 1, section 44 of the treaty. *The documents of the National Assembly summoned for 20 April 1869.* Vol. 10. Printed in Deutsch's Printing Press and Publishing Company, Pest, 1871. (hereinafter: KI. 1869. X.), no. 1034, p. 102.

[18] Nagy I. (ed.), *The journal of the National Assembly summoned for 20 April 1869.* Vol. 17. Printed by the Légrády Brothers, Pest, 1871 (hereinafter: KN. 1871. XVII.) p. 22.

[19] KN. 1871. XVII. p. 26.

[20] KN. 1871. XVII. p.27. Cf. KI. 1869. Vol. X, no. 1034, p. 102. The phrase "Austrian-

Hungarian citizen" can also be found in Articles I, II and IV of the treaty.
[21] KN. 1871. XVII. p. 27.
[22] KN. 1871. XVII. p. 28.
[23] KN. 1871. XVII. p. 28
[24] KN. 1871. XVII. p. 29.
[25] KN. 1871. XVII. p. 29.
[26] KN. 1871. XVII. p. 30.
[27] KN. 1871. XVII. p. 30.
[28] KN. 1971. XVII. p. 31.
[29] KN. 1871. XVII. 31. The Hungarian upper house accepted the draft version of the law in the form it was forwarded by the house of representatives. KN. 1871. XVII. 70. In connection with the 14th Amendment, Burdick discussed the Dred Scott v. Standford case. Burdick, F. M., *The Law of the American Constitution. Its Origin and Development.* G. P. Putnam's Sons, New York–London, 1922. p. 327., Bernstein, R. B., *Amending America. If We Love the Constitution So Much, Why Do We Keep Trying to Change It?* Times Books, New York, 1993. pp. 111-112., Maltz, E. M., *Rethinking Constitutional Law. Originalism, Interventionalism, and the Politics of Judicial Review.* University Press of Kansas, s. l. 1994. pp. 55-57.
[30] Nagy E., *Hungarian Public Law (Constitutional law).* Athenaeum, Budapest, 1907. p. 112.
[31] There could be no dual citizenship also under Act L of 1879.
[32] Dyne, 1904. p 285, 327., Webster, 1981. pp. 341-342.
[33] Hungarian National Archives (hereinafter: MOL) K 150. 1880. I. 10. 25104. protocol no. (hereinafter: p.n..) 25104. basic number (hereinafter: b.n..) Documents related to citizenship are located in the MOL. In connection with the above case: MOL K 150. 1879. I. 10. 28722. p.n. 5760. b.n. The deed of naturalization shows the name Rosenfeld Charles, who is identical with the applicant.
[34] MOL K 150. 1880. M. IX. 25238. p.n. 1335. b.n. Tivadar Pio had to furnish proof of his American citizenship. MOL K 150. 1890.I. 10. 7859. p.n. Basic number missing.
[35] Balogh A., *Political notes.* Politzer Publishing Company, Budapest, 1905. p. 92.
[36] Webster, 1980. p. 155, Dyne, 1904. 285, pp. 327-328.
[37] MOL K 150. 1889. I. 10. 12431. p.n. 234. b.n. The basic number could not be exactly ascertained.
[38] MOL K 150. 1885. I. 10. 63200. p.n. 234. 63200. b.n..
[39] MOL K 150. 1884. I. 10. 2311. p.n. 234. The basic number is missing.
[40] MOL K 150. 1888. I. 10. 81587. p.n. 234. 81587. b.n..
[41] The cases of Salamon Salamon: MOL K 150. 1888. I. 10. 83059. p.n. 83059. b.n..
[42] MOL K 150. 1890. I. 10. 1751. p.n. The basic number is missing. MOL K 150. 1889. I. 10. 36322. p.n. 22784. b.n.
[43] The minister of defence also extended the term for military service in this case. MOL K 150. 1888. I. 10. 4688. p.n. 4688. b.n. They requested that the documents be returned.
[44] MOL K 150. 1887. I. 10. 33188. p.n. 28779. b.n.
[45] MOL K 150. 1886. I. 10. 25221. p.n. 7087. b.n., MOL K 150. 1886. I. 10. 7087. p.n. 7087. b.n.
[46] MOL K 150. 1887. I. 10. 33188. p.n. 28779. b.n.
[47] Kiss, 1886. p. 157.
[48] Marschalkó, 1900. p. 445, Dyne, 1904. pp. 328-329.
[49] Dyne, 1904. p. 329., Webster, 1981. p. 343., Idem, 1980. p. 175.
[50] The text of the bill can be found: KI. 1869. X. no. 1008, pp. 25-29. In the structure passed by the house of representatives: KI. 1869. X. no. 1041, pp. 116-119. The final text of the act: KI. 1869. X. no. 1077, pp. 363-366.
[51] Dyne, 1904. p. 327, Webster, 1981. pp. 341-342. On further conditions of naturalization: Korbuly I., *The public law of Hungary and the system of Hungarian constitutional law.* Eggenberger Booksellers, Budapest, 1884. p. 139., Ferenczy F., *Hungarian citizenship law.* Kner Izidor Printers, Gyoma, 1930. p. 163., Gönczi K., *Hungarians before the Supreme Court of the United States.* Osiris, Budapest, 2000. pp. 46–51.