



Why It's Wrong to Stand Your Ground

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ABSTRACT: Stand Your Ground laws have prompted frequent and sustained legal and ethical reflection on self-defense. Two primary views have emerged in the literature: the Stand Your Ground View and the Retreat View. On the former view, there is no presumptive moral requirement to retreat even if one can do so safely. According to the latter view, there is such a requirement. I offer a novel argument against the Stand Your Ground View. In cases where retreat or the infliction of defensive harm would be equally efficacious in protecting the rights of an individual, one cannot intend either simply as a means, since there is no means-relevant reason for choosing one over the other. Thus, if one intends to inflict defensive harm, one intends the infliction of defensive harm as an end. Because it is always wrong to intend harm for its own sake, there is a presumptive requirement to retreat.

STAND YOUR GROUND LAWS HAVE RETURNED to the forefront of political discourse over the past several years. Two Floridians, George Zimmerman and Michael Dunn, are said to have killed in self-defense while standing their ground.¹ According to Florida Statute 776.013, subsection 3:

A person who is not engaged in in any unlawful activity and who is attacked in any other place where he or she has a right to be has no duty to retreat and has the right to stand his or her ground and meet force with force, including deadly force if he or she reasonably believes it is necessary to do so to prevent

¹ These laws, while still controversial, such as in *Florida v Zimmerman* and *Florida v Dunn*, are now on more solid legal ground in the United States. See Brown (1991). See also the preliminary report of the American Bar Association's task force on stand your ground laws, available here: <http://www.abajournal.com/files/GunReport.pdf>.

death or great bodily harm to himself or herself or to prevent the commission of a forcible felony.²

The statute refers to a right to *be* somewhere. This inclusion introduces an ambiguity in what the statute protects. The right to stand one's ground appears derivative in the sense that it is a right to defend a more basic right. But from what right does it derive?

One possibility is that the right to stand one's ground derives from the right to life or the right not to be unjustly harmed: it applies in cases in which you're unjustly attacked and the only way to protect your right not to be attacked unjustly is, as the statute puts it, to "meet force with force, including deadly force."³

Another possibility is that the right derives from some right of movement: you have a right to travel where you please, certainly within public places or your home, and the only way to protect that right in some cases is to kill in defense of that right. Rights of movement might themselves derive from more basic bodily rights, such as the right to do with one's body as one sees fit, and one might see fit to relocate one's body.⁴ Other things being equal, it is wrong to prevent persons from relocating their bodies. There is some legal precedent for this view, as for example in the judgment reached in *State v Bartlett*:

Because the right to *go* where one will without let or hindrance, despite threats made, necessarily implies the right to *stay* where one will without let or hindrance. These remarks are controlled by the thought of a lawful right to be in the particular locality in which [one] goes, or in which [one] stays. It is true, human *life* is sacred, but so is human *liberty*; one is as dear in the eye of the law as the other, and neither is to give way and surrender its legal status in order that the other may exclusively exist.⁵

These accounts share two common features. First, if you have some right and someone wrongly threatens to violate, then you have a derivative right to prevent that violation. Second, if inflicting reasonable harm is the only means of securing your right, then the right to protect your rights entails that you have a right to inflict reasonable harm. The general view espoused is that individuals are not even presumptively required to retreat in certain cases. Heidi Kurd, one defender of this view, summarizes contemporary thinking behind this view:

2 Numerous other states in the United States have passed similar or identical Stand Your Ground laws. For more on the laws as viewed internationally, see the brief but helpful review by Steinhoff (2013, 1019-1020). For an extensive review, see Leverick (2006, ch. 4); and Brown (1991), especially ch. 1.

3 See Rodin (2002, 37): "[T]he subject has a right *to* the good whose protection is the end of defensive action. Defensive rights seem to be entailed in a very basic way by rights *to* things. Thus if I have a right to *X*, then it seems to follow as a simple corollary that I have the right to take measures to prevent my right to *X* from being violated."

4 For more on rights of movement, see Miller (2014, 364-366). Miller illustrates such a right in the convenient context of immigration.

5 71 SW 148 (1902). Cited in Leverick (2006, 78).

Of course you should be able to stand your ground when threatened with unjustified aggression. ... While there may be circumstances in which one can thwart or diffuse an aggressor's deadly intentions by fleeing the scene, forfeiting personal property, abandoning one's position, or surrendering to indignities, humiliations, or other nondeadly physical invasions, the suggestion that one must sacrifice rights to bodily integrity, freedom of movement, or property when doing so will save a culpable aggressor's life is a suggestion that should be rejected by all who think that people have rights at all (as opposed to mere interests, welfare, or "utilities"). If one is otherwise within one's rights, one should be permitted to employ whatever force is necessary to defend one's rights against those who do wrong (Kurd, 254).

Call this the Stand Your Ground View. Now consider the following case:

Kylie the Killer

Stefana took an afternoon stroll through her local park. She was admiring the natural sights and sounds when Kylie, a local and recently escaped convict, emerged from the trees, handgun drawn. Kylie fired once at Stefana, but missed. Realizing that Kylie intended to kill her, Stefana quickly assessed her options. Her truck was nearby and had a handgun in it. She could rush to the truck and use the handgun, resulting in Kylie's death and Stefana's survival; or she could start the truck's engine and drive away. Stefana knows that, if she drives away, Kylie will not pursue her. Stefana then decides to kill Kylie and does so.

Is it permissible for Stefana to kill Kylie? Ordinarily, we might suppose not because, as Helen Frowe says,

One should use force only if one has no other option. Several accounts of self-defence thus endorse the idea that a person must try to retreat from their attacker rather than use force. If I can flee without exposing myself to any great risk, I ought to do so (Frowe 2011, 11).⁶

On this view, which we shall call the Retreat View, there is a presumptive requirement⁷ to escape if you can do so at little or no risk to yourself.⁸ But this requires some clarification, for as Steinhoff observes, critiquing Rodin,

It is, however, wrong that according to the legal duty-to-retreat-doctrine I am under an obligation to retreat from an aggressor who is intending to step on my toe if by retreating I can avoid this harm and my only alternative means of avoiding it is to chop off the aggressor's head. Rather, I am completely

⁶ Judith Jarvis Thomson also endorses a duty to retreat (Thomson, 284).

⁷ There are other modified retreat views in which there is a presumptive duty to retreat from some but not all kinds of aggressors, such as culpable or villainous aggressors. See, for example, Kaufman (80) and Leverick (78-79). Thomson (284) extends the presumptive duty to retreat even when confronted by villainous or culpable aggressors.

⁸ As additional evidence for this requirement, consider that in nearly all of the standard cases, it is built into examples that escape is either impossible or would result in a comparably bad or worse result. Such explication seems unnecessary if escape is irrelevant.

justified and well within my rights if I stay where I am and endure the aggressor's stepping on my toe. Thus, the so-called "duty to retreat" is no duty to retreat at all, but at best a duty not to fight back if you could also avoid the threatened harm by retreating (Steinhoff, 1019).

The requirement, therefore, is not to retreat per se, but rather to retreat when the alternative in consideration is assaulting Threat. However, if we suppose that the local park is a place Stefana has a right to be, then according to Stand Your Ground statutes, Stefana is not obligated to retreat. Frowe likewise comments on the legal and moral reasoning behind this view:

A notable exception to [the duty to retreat], however, might be the issue of retreating within one's own property. Some legal systems do not require that a person leave their home rather than confront an attacker *even if they can safely do so*. This reflects many people's intuitions that it would be impermissible to stay and forcefully defend oneself against an attacker in one's own home, although people differ on how much force one could use rather than flee (Frowe 2011, 11).

Whereas Frowe is clear *that* there is a presumptive duty to retreat, she does not say in this passage *why* there is such a duty. Here, there is room for more than one account. Frowe's earlier language about having restricted options suggests that a necessity requirement explains the duty to retreat. David Rodin likewise endorses that such a duty follows from a necessity requirement. He writes,

Necessity in this context refers to indispensability and unavoidability rather than inevitability. It expresses the requirement that one may only take a harmful measure to protect one's legitimate right if there is no less costly course of action available that would achieve the same result...A corollary of the requirement of necessity is that there is a general duty to retreat from an aggressor, if it is possible (that is to say, readily feasible) to avoid harm in this way (Rodin 2002, 40).⁹

Uwe Steinhoff diverges from Frowe and Rodin. In a critique of Rodin, he argues that the duty to retreat derives from proportionality (Steinhoff, 1020). Steinhoff argues that proportionality is centrally concerned with avoiding causing unnecessary harm. Because typical stand your ground cases are ones in which defenders do not need to cause harm to evade harm—in other words, decidedly *not* cases where, as Yoram Dinstein says, there is "no choice of means, and no moment for deliberation" (Dinstein, 249)—it follows that they are cases in which causing harm to evade harm causes more harm than is necessary to evade harm. Thus, the defenders act disproportionately.

⁹ Rodin argues for similar requirements in warfare in Rodin (2010, 162-166). Historically, this view has some precedent, as shown in Brown (1991, 4).

Fiona Leverick takes a different view. In her chapter on retreat, she offers the following brief description of her view: “[I]t might be argued that, if the criminal law is concerned with minimizing violence and protecting all human life, there is a duty on the victim of an attack to avoid the death of the aggressor if a reasonable opportunity to escape exists” (Leverick, 69). Leverick’s description might be misinterpreted as appealing only to what is legislatively or judicially preferable. However, she appeals explicitly to moral considerations. It is because human life has paramount value that it should be preserved when there is a reasonable opportunity to do so. As she explains it,

[T]he right to life is a fundamental right. Maximum respect is accorded to that right if the law requires that if there is any possible way of avoiding taking the life of an aggressor, such as taking an opportunity to escape, then the [defender] should take that option. In this way, two lives are saved, rather than one life lost, whether that life is the life of the aggressor or the self-defender (Leverick, 76).¹⁰

Leverick therefore opposes the Stand Your Ground View, adding:

A no retreat rule was rejected on the basis that it fails to respect the right to life of the aggressor, by allowing this to be outweighed by some other value, such as the personal honour or freedom of movement of the [defender]. (Leverick, 82)¹¹

Only pacifists claim that it is wrong to stand your ground even if that is the only way to defend yourself. Defenders of the Retreat View, however, are typically not pacifists. Thus, the disagreement between the Stand Your Ground View and the Retreat View is *not* principally a disagreement about whether it’s wrong to stand your ground if doing so is necessary to defend your right to life or liberty. It is, instead, a disagreement about whether it’s wrong to stand your ground when doing so is *unnecessary* to defend your rights. If the Stand Your Ground View is true, then it’s indeed permissible to stand your ground and utilize harmful or even lethal defensive force when you could safely retreat. If the Retreat View is true, you ought instead to retreat.

There are, however, two species of the Retreat View: one epistemic and the other non-epistemic. In the standard stand your ground case under discussion, it is true either that the defender *believes* she could stand her ground or retreat, or it is not true that the defender believes that. According to the Non-Epistemic Retreat View, it is wrong for Defender to assault Threat even if Defender is unaware that she could safely retreat, whereas the Epistemic Retreat View makes the weaker claim that it’s wrong for Defender to assault Threat *if* Defender believes that she could safely retreat.

¹⁰ Leverick considers the objection that a forfeiture theory of self-defense might entail that wrongful aggressors have forfeited their right to life. She argues that the objection fails in Leverick (78-80).

¹¹ Leverick (85) rejects the use of Stand Your Ground laws in the home, since the right to property should not be placed over the right to life, but documents such laws in the literature. There are special legal protections for a right to freedom in one’s home even in warfare. See Bailliet.

The views are logically consistent, but one can accept the Epistemic Retreat View without accepting the Non-Epistemic Retreat View. Thus, an argument for the former is not necessarily an argument for the latter.

My argument is an argument for the Epistemic Retreat View. Thus, my argument entails that Defender should safely retreat *if she (accurately)*¹² believes that she can. I shall argue that Defender necessarily holds some wrongful intention if she stands her ground against Victim, utilizing harmful or lethal force against him, if she believes that she could instead safely retreat.

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A Defense of the Epistemic Retreat View

I shall assume, for the sake of argument, that there is nothing wrong with intending to harm Threat as a means to save your life or limb, or to punish Threat for some wrongdoing, or to save Threat from some unjust or unnecessary harm. However, there *is* something wrong with intending to harm or kill Threat *as an end*. To treat Threat in this way is to harm or kill him for reasons not exclusively related to justifying reasons (i.e., defense, punishment, or rescue).¹³ Instead, you harm or kill Threat for the sake of harming or killing Threat, and doing that is morally wrong. Call this the *No Harm For Its Own Sake Principle*.

The second principle concerns intentionality. When any agent intends to do a thing, she intends that thing either as an end or as a means to some end (or both). Said another way, if some agent intends something, she intends it intrinsically or she intends it extrinsically. To say that an agent intends something intrinsically is to say that she intends it for its own sake; she does it because she regards it as worth pursuing in itself. By contrast, to say that an agent intends something extrinsically is just to say that she intends it for the sake of something else. In the relevant context, then, an intended means is something intended extrinsically, whereas an intended end is something intended intrinsically. Call this the *Disjunctive Intention Thesis*.

The final principle is a claim about what an agent intends when she chooses among various equally efficient means to some end. First, Defender might choose to assault Threat instead of retreat from him because assaulting him is an *instrumentally preferable means*. For example, assaulting Threat might be the only way, or the most efficient way, for Defender to protect her rights. Or perhaps assault better satisfies some other end of Defender's, such as standing up for oneself or keeping one's honor. Second, Defender might make the same choice because she needs to select some means or other, and her selection is the selection of an *arbitrary means*. Here,

¹² I stipulate this to avoid endorsing the view that Defender ought to safely retreat even if she *falsely* believes she can.

¹³ To say that Defender intends to kill Threat is just to say that Defender aims to kill Threat. This alone implies nothing about whether killing Threat is an end of Defender's, a means to some end of Defender's, or both. Thus, to say that Defender standing her ground against Threat (when she believes she could also successfully defend her rights by retreating) is wrong because it's an *end* of Defender's to kill Threat is *not* to say that doing so is wrong because it's something Defender intends.

Defender's choice is arbitrary, like flipping a coin between assault and retreat. Third, Defender might choose assault over retreat because it's an *intrinsically preferable means*.

By hypothesis, the first possibility is excluded. I have stipulated that Defender (rightly) believes that retreating from Threat and assaulting Threat are equally good ways of defending her rights and other ends she might have. I shall now argue that the second sort of intention collapses into the third, and that the third is morally impermissible. To begin, consider the following example:

Joe the Planner

Joe is trying to decide what to do with his day. He knows he should do *something*, but he can't quite decide what it will be. He considers three options: hike, clean, or cook. Joe then picks "cook" at random.

Joe's primary end is that of doing something. Thus, cooking is a means to doing something. Of his several options, he decides to pick one at random. Given that Joe had more than one means at his disposal, is his decision to cook instead of, say, to hike *merely* a means? Suzanne Uniacke thinks not:

[T]he fact that particular harm is caused where it could have been avoided, and the stated end still achieved, can be a strong indication that this harm too was intended, part of the agent's aim. For instance, if I am physically very strong and I know that I could easily and harmlessly restrain a particular aggressor with my bare hands, but I choose instead to pick up a gun and shoot him, then it is implausible to claim that it was no part of my intention, my aim, to harm him (Uniacke, 100-101).

Uniacke's view seems to be that Joe's choice of cooking over hiking is *evidence* that Joe intends cooking as an end. But my claim is more metaphysical, namely, that to prefer some means over another *just is* to have a distinct end: namely, the end of using *this* as opposed to *that* means.¹⁴ As the example with Joe illustrates, one can come by such ends rather casually and arbitrarily. When Joe chooses cooking over cleaning, he adopts a new end—an end he (arbitrarily) prefers. Since the end is not instrumentally preferable, it is intrinsically preferable. Thus, arbitrary choosing one means over the other entails choosing a (non-instrumentally) intrinsically preferable means, which is equivalent to choosing an end. And, therefore, selecting a means arbitrarily entails selecting an end. Call this the *Means Selection Principle*.

According to the *Disjunctive Intention Thesis*, every act is intended as a means or as an end – that is, for the sake of something else or for its own sake. The disjunction is not exclusive, however. An agent can do something for its own sake while also doing it for the sake of something else. What the *No Harm for Its Own Sake Principle* forbids is harming someone for the sake of harming them, even if doing so is also for the sake of something else. If Stefana harms Kylie for reasons not exhausted by extrinsic considerations, the Stefana harms Kylie partly for some intrinsic

¹⁴ It might be that the epistemic claim is true *because* the metaphysical claim is true. However, Uniacke nowhere affirms the metaphysical claim. Nevertheless, the epistemic claim is independently plausible that offers indirect evidence for the metaphysical claim.

consideration(s). Indeed, Stefana harms Kylie partly for the sake of harming Kylie.¹⁵ But that is precisely what the *No Harm for Its Own Sake Principle* prohibits. Thus, Stefana acts wrongly when she harms Kylie. This conclusion supports a duty of retreat where retreat is rightly believed to be both possible and equally successful at defending Stefana's rights, i.e., the Epistemic Retreat View.

Objections and Replies

I shall now consider objections to my argument against the Stand Your Ground View and offer replies.

O.1 Independent Ends

One might believe something like the following counterfactual claim:

CF: If S does not intend M independently of E, then S does not intend M as an end.

If CF is true, then the Means Selection Principle is false. More to the point: If CF is true, then Defender does not assault Threat as an end. But consider the following example:

Heidi the Traveler

Heidi intends to travel from Boston to Seattle for a live-changing medical procedure. She knows she could fly, drive, or take a train. After looking at scenic pictures of Amtrak's Boston-to-Seattle Special, she decides that if she is doing to travel at all, she is going to go with Amtrak. (As she says, "Amtrak is the *only* worthwhile way to travel!") Moreover, Heidi is a nervous traveler and would not be traveling *at all* if it were not for the medical procedure.

This example shows that CF is false because although Heidi would not intend to use Amtrak if not for the medical procedure, using Amtrak is still an end for Heidi. Still, one might think that the more pressing objection is not that S *cannot* intend M as an end dependent on E, but that S *need not* intend M as an end. Thus, one might think the following counterfactual is more plausible:

CF*: If S does not intend M independently of E, then S does not *necessarily* intend M as an end.

This counterfactual might be true, but it's not clearly relevant since the Means Selection Principle doesn't say whether M is intended as an end if it's the *only* way to accomplish E; rather, the Means Selection Principle claims that M is intended as an end if it's *one of at least two* means that are equally efficient at accomplishing E. However, we might revise CF* to represent this distinction:

CF:** If S does not intend M independently of E and if M is one of at least two equally efficient ways of accomplishing E, then S does not necessarily intend M as an end.

¹⁵ It might be objected that what is truly wrong is intending harm *for no reason other than to harm*. But that isn't true of Stefana or of any case in which someone like Stefana defends herself against unjust aggression in order to self-protect or self-preserve. But the objection fails. If Stefana intends to harm Kylie both to defend her life *and* to harm for harm's sake, Stefana acts wrongly.

But this counterfactual claim is also false. Again, to prefer some means over another *just is* to have a distinct end: namely, the end of using *this* as opposed to *that* means. Admittedly, it is an end that perhaps would not be held if it were not for some other end, but as Heidi's case shows, this does not make it any less of an end.

O.2 Unintentional Harming

In the central example with Stefana and Kylie, Stefana deliberates about what she should do, realizing that she could evade harm by retreating or by inflicting defensive harm on Kylie. At the end of her deliberation, she determines to kill Kylie. But we might imagine it going differently. Imagine instead that Stefana realized retreat was an option but panicked and shot Kylie, killing her. In the revised case, it is not at all obvious that Stefana did not intend to kill Kylie for the sake of killing Kylie.¹⁶ But if that is true, then it is not obvious that there cannot be cases in which an individual knows that retreat is equally preferable as a means, kills the aggressor, and yet does not intend the killing for its own sake.

Does the objection succeed? If we describe Stefana's behavior in the revised case as "panic," we should wonder whether the behavior was voluntary. Suppose, first, that it was involuntary in the same sense that seizures are involuntary. In that case, it is possible that Stefana did not intend anything, and thus did not intend to kill Kylie for the sake of killing Kylie. But this misses the focus of the main argument, which is that the *intentional* selection of one means over another equally efficient means another entails adopting the chosen means as an end. Nowhere is it claimed that all behaviors are intentional or that individuals are never ignorant of certain relevant facts (e.g., that retreat is an option). The central cases concern individuals who are informed and occupying intentional states.

On the other hand, if Stefana's behavior was voluntary, then it was done for reasons (i.e., intentional). But then it was done either for means-relevant reasons, which (by hypothesis) is impossible since there are no such reasons; or as an end. There is no other possibility, from which it follows that Stefana intends the killing of Kylie as an end. Of course, that end is also a means to protect Stefana's rights, but that makes matters worse, since there are now two ends, one permissible to intend and the other impermissible: the end of self-protection and the end of killing Kylie.

Conclusion

To summarize, my argument has supported the Epistemic Retreat View, according to which Defender should retreat from Threat if she accurately believes that she can successfully defend her rights by retreating. The alternative view, which I have called the Stand Your Ground View, claims that there is no presumptive moral requirement to retreat under those conditions. Instead, Defender is permitted to stand her ground and assault Threat in defense of her rights.

My argument appealed not to necessity or proportionality, which have traditionally been marshaled against the Stand Your Ground View, but to the morally simple claim that it's wrong to intend Threat's death as an end in itself. Defender does this when she chooses to kill Threat instead of to retreat from Threat, where both

¹⁶ My thanks to an anonymous reviewer for raising this objection.

courses of action would be equally successful at defending Defender's rights. The reason is because when anyone chooses one means instead of another means, one adopts a new end, i.e., the end of using a particular means. Thus, when Defender chooses to kill Threat instead of to retreat from him, she adopts the end of killing Threat. Moreover, having the end of killing Threat is more than simply *intending* Threat's death, since one can intend X without intending X as an end. To say that Defender intends Threat's death is just to say that Defender has the aim of killing Threat, but that tells us nothing about *why* she has that intention (e.g., whether killing Threat is an end of Defender's, or whether it is merely a means, including possibly the only means). Thus, it is wrong for Defender to kill Threat if she accurately believes she can successfully defend her rights by retreating from Threat. Thus, contrary to the Stand Your Ground View, there is a presumptive requirement to retreat. My argument therefore contradicts the Stand Your Ground View and supports the Epistemic Retreat View.¹⁷

Works Cited

- Bailliet, Cecilia. 2007. "‘War in the Home’: An Exposition of Protection Issues Pertaining to the Use of House Raids in Counterinsurgency Operations," *Journal of Military Ethics* 6 (3): 173-197.
- Brown, Richard M. 1991. *No Duty to Retreat: Violence and Values in American History and Society*. New York: Oxford University Press.
- Dinstein, Yoram. 2011. *War, Aggression and Self-Defense*. New York: Cambridge University Press.
- Frowe, Helen. 2014. *Defensive Killing*. New York: Oxford University Press.
- Frowe, Helen. 2011. *The Ethics of War and Peace: An Introduction*. New York: Routledge.
- Kaufman, Whitley. 2010. "Self-Defense, Innocent Defenders, and the Duty of Martyrdom," *Pacific Philosophical Quarterly* 91: 78-96.
- Kurd, Heidi. 2016. "Stand Your Ground," in Christian Coons and Michael Weber, ed. *The Ethics of Self-Defense*. New York: Oxford University Press.
- Lazar, Seth. 2009. "Responsibility, Risk, and Killing in Self-Defense," *Ethics* 119 (4): 699-728.
- Leverick, Fiona. 2006. *Killing in Self-Defence*. Oxford: Oxford University Press.
- Miller, David. 2014. "Immigration: The Case for Limits," in Andrew I. Cohen and Christopher Heath Wellman, ed. *Contemporary Debates in Applied Ethics*. Malden, MA: Wiley-Blackwell.
- Rodin, David. 2010. "The Problem with Prevention," in Henry Shue and David Rodin, ed. *Preemption: Military Action and Moral Justification*. New York: Oxford University Press.
- Rodin, David. 2002. *War and Self-Defense*. New York: Oxford University Press.

¹⁷ My thanks to Bekka Williams, two anonymous reviewers, and the audience at the 2014 Concerned Philosophers for Peace conference in Pennsylvania for their comments.

- Statman, Daniel. 2008. "On the Success Condition for Legitimate Self-Defense," *Ethics* 118 (4): 659-686.
- Steinhoff, Uwe. 2013. "Rodin on Self-Defense and the 'Myth' of National Defense: A Refutation," *Philosophia* 41: 1017-1036.
- Thomson, Judith Jarvis. 1991. "Self-Defense," *Philosophy and Public Affairs* 20 (4): 283-310.
- Uniacke, Suzanne. 1996. *Permissible Killing: The Self-Defence Justification of Homicide*. New York: Cambridge University Press.