

The Commanders Dilemma: Using Ethical Denial and Deception

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Introduction

Denial and deception have played an essential role in military operations since the inception of warfare; there is no refuting their relevance to operations and their benefit when used successfully. Seldom examined in relation to denial and deception are the ethical considerations the commander must take into account when conducting operations. Ethics is a crucial area of research and study as the military moves into a world hyper aware of political correctness, international opinion, and legal issues. When viewing denial and deception through the lens of ethics and morality, do the ends in fact justify the means? The purpose of this paper is two-fold: first, to make practitioners aware of the ethical consequences of denial and deception, and second, to suggest an ethical framework for future operations.

For the purpose of this article, the definitions for denial and deception come from joint doctrine. Deception, in broad terms, is the manipulation of information and perceptions to induce the target of that deception to take or not take an action, thereby benefiting the deceiver.¹ Denial includes methods used to conceal state and military secrets, particularly from foreign intelligence collection.² John Yurechko noted, "Denial and deception are interrelated. Denial is the basis for successful deception. One cannot manipulate or blur the truth or lie convincingly unless the truth is first concealed."³ To focus the discussion in this paper, Joint Publication 3-13.4 defines military deception as "actions executed to deliberately mislead adversary military, paramilitary, or violent extremist organization decision makers, thereby causing the adversary to take specific actions or inactions that will contribute to the accomplishment of the friendly mission."⁴ In all current and previous campaigns, denial and deception are important facets of the overall strategy.

Multiple military strategists endorse denial and deception, and current U.S. military doctrine recognizes it as vital to operations. The writings of Sun Tzu note, "All warfare is based on deception... Offer the enemy a bait to lure him; feign disorder and strike him."⁵ Clausewitz states, the desire "to take the enemy by surprise... is more or less basic to all operations, for without it superiority at the decisive point is hardly conceivable."⁶ The 1978 Department of Army Field Manual on Battlefield Deception states, "Military deception has proven to be of considerable value in the attainment of national security objectives, and a fundamental consideration in the development and implementation of military strategy and tactics."⁷ Policy, manuals and theorists all suggest deception is an indispensable component of warfare, and American military commitment is clear in their agreement based on the litany of varied courses offered through training and education.

The Ethical Triangle and Deception

When viewing denial and deception through the lens of ethics and morality, do the ends in fact justify the means? This paper will apply the ethical triangle to short case studies taken from various periods of war. The ethical triangle, as shown in figure one, combines the theories of rules-based ethics, virtues-based ethics, and consequences-based ethics.⁸ Theology is not

included in this writing; the reader may apply their own views to denial and deception while maintaining the ability to interpret their beliefs through the theories discussed. In the end, with the application of various concepts contained in the ethical triangle, the reader may find not all is fair in love and war, at least in the context of war.

THE ETHICAL TRIANGLE



Figure 1. The “Ethical Triangle”

A generally accepted definition of rules-based, also known as principles-based, ethics states one should not act according to the consequences of an action, but instead according to agreed-upon or settled values and principles.⁹ Dr. Jack Kem, professor at the United States Army Command and General Staff College, noted, “when looking at ethical dilemmas through the lens of rules-based ethics, consideration must be made for the rules that exist.”¹⁰ Immanuel Kant, a central figure in contemporary philosophy and the primary rules-based ethics philosopher, felt that man knows the difference between right and wrong; it is man’s choice to decide between the two.¹¹ Rules, laws, and regulations provide a framework for what is acceptable within a culture. The difficult part is assessing in a larger, strategic context what rules fit which society when acting in times of war or peace.

One set of agreed upon laws pertaining to deception would include excerpts from the Geneva Conventions. Current accepted law discusses perfidy and ruses of war. The law of armed conflict prohibits the use of “Perfidious acts” under the 1977 Protocol I Additional to the Geneva Conventions of 12 August 1949. This addition states:¹²

Article 37. – Prohibition of perfidy

1. It is prohibited to kill, injure or capture an adversary by resort to perfidy. Acts inviting the confidence of an adversary to lead him to believe that he is entitled to, or is obliged to accord, protection under the rules of international law applicable in armed conflict, with intent to betray that confidence, shall constitute perfidy. The following acts are examples of perfidy:

- (a) The feigning of an intent to negotiate under a flag of truce or of a surrender;*
- (b) The feigning of an incapacitation by wounds or sickness;*

- (c) *The feigning of civilian, non-combatant status; and*
(d) *The feigning of protected status by the use of signs, emblems or uniforms of the United Nations or of neutral or other States not Parties to the conflict.*

However, Protocol I does not prohibit “ruses of war;” this includes misleading or prompting the enemy to act hastily.¹³ Ruses of war are not perfidy because, “they do not invite the confidence of an adversary with respect to protection under that law.”¹⁴ Ruses include the use of camouflage, placing decoys, conducting mock operations, and disseminating misinformation. By viewing deception in a broad sense, it is legally acceptable within certain limits.

Consequences-based ethics, also known as utilitarianism, focuses on the approach that the best decision produces the greatest good for the greatest number of people.¹⁵ William Shaw goes a step further by stating, “According to consequentialism, an action is right if and only if nothing the agent could do would have better results.”¹⁶ A commander and his staff must rely upon education, training, and experience, as well as gut feeling, and sometimes best guess to assess the possible consequence of an action and if it will produce the greatest good. However, it is difficult to evaluate with accuracy the exact outcome from a chosen strategy prior to conducting the course of action. What complicates matters is the fact that the measurements can be subjective in nature and through whose eyes is the measurement taken. There is an additional question of whether or not the omission of acting is the same as acting to produce results, some would view there to be a substantial moral difference between a deliberate and non-deliberate actor. The accurate measurement of consequences usually takes place after the operation.

Good character is the central theme of virtues-based ethics.¹⁷ A virtue-based ethics philosopher will identify virtues that a virtuous person personifies, such as courage, temperance, and truthfulness. To the philosopher, having these virtues is what makes one moral. Philosophy professor Heather Battaly notes, some virtue ethicists have been happy to work on the assumption that there is no principled reason for limiting the number of virtues and plenty of reason for positing a plurality of them.¹⁸ Ultimately, a person’s actions are a reflection of that inner morality.

Viewing Virtues-Based Ethics Differently

When applying the ethical triangle to a deception plan, one may find that the virtues-based point of the triangle is already at issue. Throughout the philosophical history of the West there is or was a strong moral belief against essentially all forms of deception.¹⁹ There are countless examples of battles where a combatant has fallen because they would not stoop so low as to deceive the enemy; the combatants would “fight fair.” British Colonel Garnet Wolseley once said, “As a nation we are bred up to feel it a disgrace even to succeed by falsehood; the word spy conveys something as repulsive as slave; we will keep hammering along with the conviction that ‘honesty is the best policy,’ and that truth always wins in the long run.”²⁰ To apply the ethical triangle, one must alter the application of the virtues-based portion when the result is tantamount to lying.

One must view the lie in another manner in the case of denial and deception. A virtue ethicist may view ethics through this lens: “Act as a virtuous person would act in your

situation.”²¹ Although some would view lying as not being virtuous, others may view the lie to be of no consequence if the intent was good. If the act were legally acceptable, under the circumstances noted in the Geneva Conventions, then the next step would be to associate an ethical reason behind the lie. According to the peer reviewed academic resource Internet Encyclopedia of Ethics:²²

Virtue is determined by the right reason. Virtue requires the right desire and the right reason. To act from the wrong reason is to act viciously. On the other hand, the agent can try to act from the right reason, but fail because he or she has the wrong desire. The virtuous agent acts effortlessly, perceives the right reason, has the harmonious right desire, and has an inner state of virtue that flows smoothly into action.

In this manner, the reason behind the deception becomes a focal point, not the lie itself.

Deception Case Studies and the Ethical Triangle

It is rare for an officer to have many opportunities to conduct tactical denial and deception on the battlefield against the enemy and then reflect upon the ethical consequences. *Practise to Deceive* notes:²³

Deception in [Barton Whaley’s] analysis is a mind game, and the variations in guilefulness between opposing individuals or groups can be crucial in deciding the victory in combat. First, intensive and sophisticated application of deception can compensate for smaller numbers and inferior technology. Second, this intensity and sophistication is probably best learned through frequent practice. Third, practice can be supplemented, perhaps even replaced, by studying historical cases of successful deception operations.

The following short case studies will illuminate what Whaley believes, that the study of historical cases supplement an officers understanding of denial and deception.

General George Washington became the original American master of spies with an aptitude for leaking false intelligence to deceive the enemy. Washington deceived British General Clinton by the use of fictitious movement of provisions, forage, and barges to the north for an attack on Staten Island, so that forces could attack a weakened Cornwallis at Yorktown. General Clinton felt his 25,000 troops were superior to Washington’s 19,500 and decided to split his force around New York to open a campaign to outflank Washington. By dividing his forces, Clinton gave Washington two attractive targets; the enemy armies were too far apart to support one another.²⁴ Washington’s deception convinced General Clinton that New York was the target of military operations. Meanwhile, Washington began a secret buildup for an assault at the coastal city of Yorktown where Lord Cornwallis “lounged in a false sense of safety in numbers.”²⁵ The assault worked, Lord Cornwallis surrendered on October 19, 1781. England had lost 10,000 British and Hessian troops; this amounted to 40% of the entire army in the colonies. Whereas the colonists suffered only approximately 300 casualties. Whaley notes that American historians see Washington as “either merely lucky or as a master of the Fabian strategy and tactics, ever-retreating to preserve his army until the British simply got tired of the chase and

gave up.”²⁶ Assuming this is accurate, Washington’s ability to deny accurate information to the British and his deceptive plans succeeded in defeating a larger and more capable British Army. Moreover, his deception in regards to Yorktown neatly fits within expectations of the ethical triangle due to Washington’s consistent awareness that the Americans had to live in the same country they fought in after the war. The rules of war were followed according to the times, the consequences for the Americans were low in relation to the disaster that it could have been had it drag on much longer, and as noted previously, Washington acted in a manner to shorten the Revolutionary War. Even today, there are not many instances where the American military would be held in contempt for violating basic human rights or other applicable laws when viewed through the overall ends of becoming a free nation.

General William T. Sherman weaved a 180-mile long logistic train along a single railway line in his 1864 March to Atlanta with only one option for deceiving the enemy during each engagement, whether to attack on the right or left.²⁷ “Right flank or left, he always succeeded in using tactical deception to conceal which side it would be.”²⁸ General Sherman noted this to be, placing the enemy “on the horns of the dilemma.”²⁹ Having taken Atlanta, General Sherman continued for another 300 miles, which would not have been possible without his effective use of deception. Sherman does not fit within expectations of the ethical triangle. Upon closer evaluation, Sherman routinely conducted scorched-earth policies that would not be conducive to today’s environment. Scorched-earth policies are for operational purposes, not political; however, there are many political consequences to conducting scorched-earth tactics. The target is anything a military or the enemy’s military can use, such as food, transportation, and industrial resources. Sherman’s forces destroyed military targets, as well as industry and civilian property in order to forestall the Confederate economy and transportation networks. When applying the ethical triangle, Sherman could postulate he acted virtuously for the nation, his reason being an end to a bloody civil war. Sherman was not the first or the last to conduct scorched-earth policies. Today, the civil wars of Sri Lanka, Libya, and Syria are the most recent examples of where scorched-earth operations have taken place. The most recent account being from Syria where Bashar al-Assad burned large areas of trees and forests to keep them from use as cover by the Free Syrian Army.³⁰ Although successful for the Union at the time, Protocol I of the Geneva Convention banned these kinds of actions in 1977.³¹

During World War II, the Allied Command implemented a deception strategy code-named Bodyguard that included OPERATION FORTITUDE. Operation Fortitude aimed to deceive German forces as to the Normandy location of the imminent invasion by creating phantom invasion armies in the north at Norway and the south at Pas de Calais.³² Donovan views success through the eyes of the Germans:³³

Field Marshal von Rundstedt conducted his own analysis of the situation on 29 May utilizing all the intelligence available and his personal observation that the Allies had dropped twice as many bombs on the Pas de Calais area than they had in the Normandy area. He concluded and reported back to the OKW his reaffirmation that the Allied main effort would be against the Pas de Calais area... Hitler also stated that while the Allies might conduct elaborate feints against Normandy or the Netherlands, the Allied main effort would still be against Pas de Calais.

FORTITUDE's primary objectives included allowing the Allies to land at Normandy and keeping German forces uncommitted in northern France, Denmark, and Norway.³⁴ This formidable deception plan followed the rules of war of the times; however, the consequences were high on all sides when including the assault on D-Day and the Normandy beach landings. Unless the world broke out into another world war, it is unlikely one would see another FORTITUDE with such high costs again. In the end, the Allies acted in a virtuous manner intending to shorten World War II and save lives. In retrospect, the world views FORTITUDE as a bold plan that accelerated the end of the war in Europe.

In a more recent example from Desert Storm, Central Command (CENTCOM) envisioned two Army Corps augmented with French and United Kingdom divisions would sweep west of the Iraqi defenses. Forces were to strike deep into Iraq, cut Iraqi lines of communication, and destroy the Republican Guards forces; while a supporting attack along the Kuwait-Saudi Arabia border by the I Marine Expeditionary Force with Arab Coalition Forces to hold forward Iraqi divisions in place.³⁵ However, news sources worldwide broadcasted the plan openly across multiple sources of information. To deceive the enemy, CENTCOM decided to conduct a leaflet operation.³⁶ On January 11, 1991, the coalition dropped 12,000 leaflets in empty plastic water bottles to warn Iraqis of impending attacks that washed ashore that supported the deception of an attack from the sea.³⁷ To further the plan, the United States Navy maneuvered in the waters just off the Kuwait shoreline, and Navy SEALs conducted reconnaissance operations while the Marines practiced invasion procedures, all designed to keep the Iraqis attention away from the real location of the pending offensive.³⁸ Meanwhile, south of Kuwait, the 1st Cavalry Division moved into Kuwait from their positions in Saudi Arabia. Coalition forces broadcast radio traffic to indicate the presence of several armed forces divisions. Combined, these acts were part of a deception strategy to keep the Iraqis from looking to the west. This deception fits within the desired outcomes of the ethical triangle; the coalition followed the rules of war according to the times, the consequences for the Americans were low, and as noted previously, commanders acted in a manner to shorten the operation to the extent needed to end hostilities and ensure a peaceful resolution.

Deception beyond Warfare

Military theory and practice thoroughly establish denial and deception as vital to operations; however, this gives rise to subsequent ethical concerns. John Mattox notes, "even if deception is morally acceptable in at least certain military contexts, the alleged moral acceptability is largely without parallel in the remainder of the whole of human experience."³⁹ If one accepts denial and deception in connection to the ethical triangle, two issues remain. First, should the deceivers be trusted beyond warfare, and second, should nations who deceive be trusted outside of war.

If one accepts that deception is not the same as lying in a fundamental sense within the setting of war, there remains the issue of trusting the deceivers to remain within the bounds of conducting deception in warfare. One need not look far to find examples such as Colonel T.E. Lawrence, also known as Lawrence of Arabia, in a case of deception and self-deception. Lawrence of Arabia created his own mythical legends and "romantic or self-serving writers" have perpetuated them for generations.⁴⁰ Whaley states, "Lawrence was a con man whose

deceptions were directed more against allies than foes. He risked lies to gain fame and social acceptance among the famous, whose names he freely dropped.”⁴¹ However, Whaley studied Lawrence not so much for what he did to deceive those he worked with, but because of the effect he had on the imaginations of those around him.⁴²

Lawrence’s real contribution to military history was his articulately argued theory of guerilla war, which gained undeserved weight by the mythical success that surrounded its author. But this myth gave encouragement and ammunition to such advocates of unconventional – and successful – surprise attack operations as Churchill, Wavell, and Liddell Hart.

Lawrence, although later uncovered to be a liar in all facets of life, did contribute to denial and deception; he even preceded Dudley Clarke in the conception of a notional unit, a brigade size force deceptively created from a smaller battalion to confuse the Turks in 1918 during desert offensive operations.⁴³ In the end, much like with Lawrence, the military has no choice but to trust the deceivers of the battlefield unless proven to act deceptively in an illegal or unethical manner beyond their given mission.

The second issue with deception on the battlefield rests between nations that engage in war. Mattox posits, “The extent to which true and lasting peace and cooperation among nations can be established depends upon the extent to which nations trust one another.”⁴⁴ Famous national leaders have advocated their use of deception; including Winston Churchill who told Joseph Stalin at the Tehran Conference in 1943, “In wartime, Truth is so precious that she should always be attended by a bodyguard of lies.”⁴⁵ The amount of questions posed by philosophers and theorists would overwhelm this article, but John Chomeau posits a series of questions that require continued thought:⁴⁶

How far can a military commander or the national command authority properly go in lying to an enemy? It is no longer "all's fair in love and war" (and it probably never was). To whom is it proper to lie? In some cases, certainly the enemy. But can one also lie to one's allies, either to make the lie to the enemy more credible or because we don't believe our allies can keep a secret? What about the units of your own force which are not involved in the deception? How much can be held back from them? Can we deliberately deceive them in order again to strengthen the lie?

Various attitudes prevail to these answers based upon the previously discussed theories of rules-based ethics, virtues-based ethics, and consequences-based ethics. However, if a nation does not lie, they could be caught in a dilemma that Wavell discusses:⁴⁷

Possibly because the British character is normally simple and straightforward, more probably because our military training is stereotyped and unimaginative, deception of the enemy does not seem to come naturally to us. Hence we are apt to suffer in the field through lack of guile and to fall too easily into the enemy’s traps and to miss opportunities of setting traps of our own.

Mattox concludes, “Military leaders sensitive to this reality are far better equipped to use deceptive measures in a way that minimizes their long-term negative effects than are those who ignore the moral dimension of deception.”⁴⁸ However, nations acting to deceive must remember, those who are deceived do not always overlook or forgive actions taken in war. This may even include actions taken outside of war, such as deterrence or diplomacy. Again, as with trusting the deceivers, nations have to work together in good faith, either as allies during war or as reconciliation partners post war, according to the agreements struck at the end of hostilities.

There are many other issues that remain in the denial and deception issue beyond the two mentioned above. How does a nation trust its government if the administration deceives the population? What role does religion take when applied to virtues? Should international law reflect current issues in cyber or information operations in relation to denial and deception? The research is endless into the ethical dimensions of denial and deception. The two noted issues above are not all inclusive of the expanse of additional questions or concerns not covered in the scope of this article, and should be the basis for continued research and discussion on ethics.

Conclusion

In conclusion, the ethical triangle could be one way of applying an ethical framework to denial and deception. Mattox further presents three alternatives as potential accounts for the moral status of deception when considering the conversation of virtue. The first is simply to reason that deception is tantamount to lying; the second is to argue since “all is fair in war;” and the third is to contend that deception is, in fact, something different from lying as understood by philosophers such as Immanuel Kant.⁴⁹ Although some would think the third alternative seems to be the position adopted almost universally by the prominent legalists and just war theorists since the Middle Ages, it would seem as if all three have been widely accepted during the application of deception in war.⁵⁰ By applying the various facets of the ethical triangle, a commander can attempt to answer all sides of the ethical deliberation sufficiently before making a decision on a course of action.

¹ Joseph W. Caddell, “Deception 101 - Primer on Deception,” (Army War College Monograph, 2004), 18.

² Caddell, “Deception 101 – Primer on Deception,” 17.

³ John Yurechko, Defense Intelligence Agency, “DOD Briefing on Iraqi Denial and Deception,” October 8, 2002. Quoted in Caddell, “Deception 101 – Primer on Deception,” 17.

⁴ Department of Defense, *Joint Publication 3-13.4 26, Military Deception*. (Washington, DC: US Government, 2012). Vii.

⁵ Sun Tzu, *The Art of War*. (London: The Oxford University Press, 1971), 66.

⁶ Carl von Clausewitz, *On War*, 1832, ed. and trans. Michael Howard and Peter Paret. (Princeton: Princeton University Press, 1984), 198.

⁷ Department of the Army, *Field Manual 90-2, Battlefield Deception* (Washington, D.C.: Government, 1978), iii.

⁸ James H, Svava, “The Ethical Triangle: Synthesizing the Bass of Administrative Ethics,” CSG & ASPA Public Integrity Annual (1995), 38-39, and Dr. Jack Kem, “Ethical Decision Making: Using the “Ethical Triangle,” Command and General Staff Officers Course, L102: Ethical Dimensions of Organization Leadership. (Fort Leavenworth, KS: US Government, 2016), 4.

⁹ Dr. Jack Kem, “The Use of the ‘Ethical Triangle’ in Military Ethical Decision Making,” *Public Administration and Management* Vol 11, No. 1 (2006), 27.

¹⁰ Kem, “The Use of the ‘Ethical Triangle’ in Military Ethical Decision Making,” 28.

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- ¹¹ Kem, “The Use of the ‘Ethical Triangle’ in Military Ethical Decision Making,” 28.
- ¹² International Committee of the Red Cross. “Protocol Additional to the Geneva Conventions of 12 August 1949, and relating to the Protection of Victims of International Armed Conflicts (Protocol I), 8 June 1977,” <https://ihl-databases.icrc.org/applic/ihl/ihl.nsf/7c4d08d9b287a42141256739003e636b/f6c8b9fee14a77fdc125641e0052b079> (accessed 27 February 2017).
- ¹³ ICRC, “Protocol Additional to the Geneva Conventions of 12 August 1949, and relating to the Protection of Victims of International Armed Conflicts (Protocol I), 8 June 1977.”
- ¹⁴ ICRC, “Protocol Additional to the Geneva Conventions of 12 August 1949, and relating to the Protection of Victims of International Armed Conflicts (Protocol I), 8 June 1977.”
- ¹⁵ Kem, “The Use of the ‘Ethical Triangle’ in Military Ethical Decision Making,” 32.
- ¹⁶ William Shaw, *Utilitarianism and the Ethics of War*. (New York, New York: Routledge, 2016), 21.
- ¹⁷ Kem, “The Use of the ‘Ethical Triangle’ in Military Ethical Decision Making,” 32.
- ¹⁸ Heather Battaly, “A Pluralist Theory of Virtue”, *Current Controversies in Virtue Theory*, (New York, New York: Routledge, 2015) 7–21.
- ¹⁹ John Mattox, “The Ethics of Military Deception,” (Command and General Staff College Thesis, 1998), PAGE.
- ²⁰ Colonel Garnet Wolseley, *The Soldier’s Pocket-Book for Field Service*, (1869), 169. Quoted in Barton Whaley, *Practise to Deceive: Learning Curves of Military Deception Planners*. (Annapolis, Maryland: Naval Institute Press, 2016), 190.
- ²¹ Nafsika Athanassoulis, “Virtue Ethics,” Internet Encyclopedia of Philosophy. <http://www.iep.utm.edu/virtue/#H4> (accessed 21 March 2017).
- ²² Athanassoulis, “Virtue Ethics.”
- ²³ Shaw, *Utilitarianism and the Ethics of War*, xvi
- ²⁴ Whaley, *Practise to Deceive: Learning Curves of Military Deception Planners*, 61.
- ²⁵ Dave Richard Palmer, *The Way of the Fox: American Strategy in the War for American, 1775 – 1783*. (Westport, Connecticut: Greenwood Press, 1975.) 170-178 and Whaley, *Practise to Deceive: Learning Curves of Military Deception Planners*, 61.
- ²⁶ Whaley, *Practise to Deceive: Learning Curves of Military Deception Planners*, 62.
- ²⁷ Whaley, *Practise to Deceive: Learning Curves of Military Deception Planners*, 62.
- ²⁸ Liddell Hart, *Strategy: The Indirect Approach*, third revised edition. (London: Faber and Faber, 1954) 149-153 and Whaley, *Practise to Deceive: Learning Curves of Military Deception Planners*, 62.
- ²⁹ Hart, *Strategy: The Indirect Approach*, 151-152.
- ³⁰ “Syria’s forests pay a heavy price”. YouTube. 2014-01-05. Retrieved April 2, 2017.
- ³¹ ICRC, “Protocol Additional to the Geneva Conventions of 12 August 1949, and relating to the Protection of Victims of International Armed Conflicts (Protocol I), 8 June 1977.”
- ³² Lieutenant Colonel Michael Donovan, “Strategic Deception: Operation Fortitude,” (Army War College Research Project, 2002), 2-5.
- ³³ Donovan, “Strategic Deception: Operation Fortitude,” 13.
- ³⁴ Anthony Cave Brown, *Bodyguard of Lies*. (New York: Harper & Row, 1976), 389 and Donovan, “Strategic Deception: Operation Fortitude,” 15.
- ³⁵ Department of Defense, *Conduct of the Persian Gulf War*. (Washington, DC: US Government, 1992), 275.
- ³⁶ Department of Defense, *Conduct of the Persian Gulf War*, 622.
- ³⁷ Department of Defense, *Conduct of the Persian Gulf War*, 190.
- ³⁸ Department of Defense, *Conduct of the Persian Gulf War*, 298.
- ³⁹ Mattox, “The Ethics of Military Deception,” 4.
- ⁴⁰ Whaley, *Practise to Deceive: Learning Curves of Military Deception Planners*, 80.
- ⁴¹ Whaley, *Practise to Deceive: Learning Curves of Military Deception Planners*, 81.
- ⁴² Whaley, *Practise to Deceive: Learning Curves of Military Deception Planners*, 80-83.
- ⁴³ Whaley, *Practise to Deceive: Learning Curves of Military Deception Planners*, 83.
- ⁴⁴ John Mattox, *The Moral Status of Military Deception*, <http://isme.tamu.edu/JSCOPE00/Mattox00.html> (Accessed 14 February 2017).
- ⁴⁵ Whaley, *Practise to Deceive: Learning Curves of Military Deception Planners*, 65.
- ⁴⁶ John Chomeau, “All is Fair in Love and War”, *The International Society for Military Ethics*, <http://isme.tamu.edu/JSCOPE95/Chomeau95.html> (accessed on 3 March 2017).
- ⁴⁷ Archibald Wavell, *Speaking Generally* (London, England: Macmillan, 1946), 80.
- ⁴⁸ John Mark Mattox, “The Moral Limits of Military Deception,” *The Journal of Military Ethics* Volume 1, Issue 1 (2002), 15.

⁴⁹ Mattox, "The Ethics of Military Deception," 10.

⁵⁰ Mattox, "The Ethics of Military Deception," 10.