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The Divorce Mill: Mercenary Citizenship in the Twilight of the Habsburg Empire

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This article analyses how wealthy men and women manipulated citizenship regimes during and after the Habsburg Empire to access the family laws most convenient for their private lives. To do this, I compare migratory divorce practices in pre-1918 Habsburg Hungary and the post-1918 Free State of Fiume. This article shows that while before 1918 it was mercenary actors who utilised legal loopholes between Austrian and Hungarian family laws and citizenship regulations to obtain divorces for the rich, after 1918 it was the impoverished, globally-isolated, mercenary postimperial state that procured the means for rich clients to buy their way out of their own state's family laws, raising questions about the relationship between the early twentieth-century postimperial world of globally dependent European successor states with today's postcolonial 'golden passport' system.

In 1944, high-ranking fifty-four-year-old fascist official Salvatore Bellasich (1890–1946) had yet another reason to be grateful his life story could be explained through the fortunes of the afterlives of empire. Born a little less than a quarter of a century before the First World War began, Bellasich was raised in the Hungarian-controlled Habsburg maritime trading hub Fiume, today Croatia's third-largest city, Rijeka. Before the war, Bellasich was a young man of humble means on the make: he studied law in Budapest (as was the norm for his hometown); he clerked in a well-established firm with deep ties to Fiume's merchant and administrative circles; he joined the local Freemasons; and he did what one would expect of a lawyer determined to move up in the world.¹ Except for one thing: he was a strident Italian nationalist, which got him put in a detention camp in 1915 while the Habsburg Monarchy was at war with his beloved Italy. When Austria-Hungary dissolved in 1918 and Bellasich returned home to Fiume, the skills and networks he had accumulated proved profitable. Not only was he a lawyer and administrator in a time when a new postimperial state was being made, but he also loved power and money enough to prioritise enriching himself in the immediate years after 1918 by manipulating legal systems just as the Habsburg administration of his hometown faded away and Fiume – a town with a population of 50,000 – was transformed into a microstate.² Bellasich did not initially support Mussolini's National Fascist Party, but he joined up once he realised that Italian fascism was on the rise. Fast forward to 1944 when Mussolini's

¹ Bellasich is a well-known figure in the local histories of mid-twentieth-century Fiume, especially regarding Gabriele D'Annunzio's occupation of the city and the Italian nationalist campaigns that overtook the town throughout the interwar. Ljubinka Toševa-Karpowicz has written most widely on his background and importance, especially in: Ljubinka Toševa-Karpowicz, *D'Annunzio u Rijeci: mitovi, politika i uloga masonerije* (Rijeka: Izdavački centar Sušak, 2007); Ljubinka Toševa-Karpowicz, *Masonerija, Politika I Rijeka: (1785.–1944.)* (Rijeka: Državni arhiv u Rijeci, 2015) with its English translation, Ljubinka Toševa-Karpowicz, *Freemasonry, Politics and Rijeka (1785–1944)* (Washington, DC: Westphalia Press, 2017).

² For context on Fiume's position in post-1918 international settlements, Italian national ambitions and how and why Fiume became a Free State in the early interwar period, see Dominique Kirchner Reill, *The Fiume Crisis: Life in the Wake of the Habsburg Empire* (Cambridge, MA: Belknap Press, 2020); Raoul Pupo, *Fiume città di passione* (Rome: Laterza, 2018).

new state, the Republic of Salò, controlled Fiume and had Bellasich investigated after accusations that he had used his roles within the fascist government to improve his finances.³ If it could be proven that Bellasich's wealth had skyrocketed under fascism while everyone else was getting poorer, he could have found himself in trouble. But if he could prove that he had got rich before he was a fascist functionary, he would be in the clear.

This article is not about Bellasich's underhanded deals (though there were many). Nor is it about the thousands of people who lost their livelihoods because of him (though there were many of these, too).⁴ Instead, I want to look at the seemingly strange way that fascist functionaries tried to prove Bellasich's innocence: they explained his wealth by saying 'his economic situation derives from the profits made professionally, especially through divorce cases and real estate' in the five years before Fiume was annexed to fascist Italy in 1924.⁵ Divorce is, of course, a very profitable industry for lawyers, but Bellasich's new wealth far exceeded the fees he charged his most lucrative clients. Instead, he had made his fortune by introducing a mercenary citizenship regime into his town's post-Habsburg administration. He and a couple of other well-placed friends in Fiume's city-state government pushed through legislation that created a special form of 'temporary citizenship, valid only until a divorce is finalised'.⁶ The plan was beautiful in its greed and cynicism. Fiume would offer citizenship to anyone who claimed a local domicile (usually organised by Bellasich), contracted a Fiume lawyer for divorce proceedings (also, usually, Bellasich), paid an exorbitant fee to state coffers, and signed a citizenship contract indicating that once the fees had been paid and the divorce was finalised, Fiume could annul the citizenship posthaste.

For the fascist courts, this kind of capital production was a remnant of the bygone years before Mussolini's New Order, harking back to the illicit dealings associated with a corrupt, postimperial, pre-fascist liberal world outside the fascist investigators' scope of interest. As such, Bellasich's new wealth was explained and the case against him was dismissed. To today's eye, however, the phenomenon of thousands of divorce clients flocking to an eleven-square-mile microstate and paying a premium to acquire its citizenship to take advantage of its legal system feels less like the past and more like a precursor of our present. It reeks of bitcoin billionaires setting up basecamps in Caribbean Island nations to avoid regulations and taxes; or nervous and affluent LGBTQ Americans paying for Portuguese passports to benefit from EU citizenship rights as homophobia gains ever more influence in the United States. How, then, should we interpret Bellasich's

³ For a useful historiographical survey of the history of Mussolini's last fascist state, the Italian Social Republic (RSI), also known as Salò, see: Toni Rovatti, 'Linee di ricerca sulla *Repubblica Sociale Italiana*', *Studi Storici* 55, no. 1 (2014): 287–99.

⁴ There is a growing amount of work examining how Italian nationalist policies and capitalist pursuits (spearheaded in part by Bellasich) worked together in Fiume/Rijeka, putting ever more people at risk. For example, see: Dominique Kirchner Reill, Ivan Jeličić, and Francesca Rolandi, 'Redefining Citizenship after Empire: The Rights to Welfare, to Work, and to Remain in a Post-Habsburg World', *Journal of Modern History* 94, no. 2 (2022): 326–62. See especially the work of Ivan Jeličić – whose research focuses on the socialist organisations in Fiume in the first half of the twentieth century – and Francesca Rolandi – who pays special attention to the questions of gender, work and nationalism. Ivan Jeličić, 'Uz stogodišnjicu rijeckog Radnickog vijeka. Klasna alternativa nacionalnim državama na sutonu Monarhije', *Časopis za povijest Zapadne Hrvatske* 12 (2017): 63–85; Ivan Jeličić, 'Nell'ombra dell'autonomismo. Il movimento socialista a Fiume, 1901–1921' (PhD thesis, Università degli studi di Trieste, 2016); Ivan Jeličić, 'La parabola del socialismo adriatico', *Qualestoria*, no. 1 (2020): 169–76; Ivan Jeličić, 'Repubblica con chi? Il movimento socialista fiumano e il giallo Sisa nel contesto post-asburgico fiumano', *Qualestoria*, no. 2 (2020): 73–93; Francesca Rolandi, 'Female Public Employees during a Post-Imperial Transition: Gender, Politics and Labour in Fiume after the First World War', *Contemporary European History* (2022): 1–14; Francesca Rolandi, 'Un trionfo mai richiesto? Partecipazione politica femminile e rappresentazioni di genere nella stampa locale di Fiume e Sušak dopo la Grande guerra', *Italia contemporanea* 293 (2020): 73–98 with the English translation available at: Francesca Rolandi, 'A Never Requested Triumph? Reframing Gender Boundaries in Fiume and Sušak after 1918', *Italia Contemporanea Yearbook* (2020): 11–36.

⁵ All information on the corruption case brought against Bellasich is taken from: Državni Arhiv u Rijeci: 53, Kabinet Osnaka a-1, Osobni dosej: Bellasich Salvatore.

⁶ This legal formula is used throughout citizenship/divorce applications in Fiume from 1922 onward. More on this will be provided later in the article, but examples can be easily found throughout the application files held in: Državni Arhiv u Rijeci: 541 Općina Rijeka, Izdvojeni predmeti, Odustajanje i prihvaćanje riječke zavičajnosti, 1923.

shenanigans? Does the Fiume divorce-mill jackpot represent a last gasp of an empire's afterlife? Or was it a precursor of today's 'golden passport' market that provides an escape route for the super-rich who are eager to flout their own state's laws?⁷ And if it's both, does that point to a relationship between the afterlives of pre-1918 empires and today's neoliberal turn where national sovereignty is ever more vulnerable to the desires of the global rich? To answer these questions, I look in detail at the Habsburg 'divorce mills' that preceded Fiume's post-1918 mercenary-citizenship arrangements, and I explore what made Bellasich's postimperial iteration of Habsburg practice both similar and different from the earlier model. I end by circling back to the beginning, questioning what the conniving, greedy Bellasich and his Fiume family law moneymaking scheme tell us about the relationship between the empires of yore and the hyper-mobility of twenty-first-century global elites.

Divorce for Sale, just across the Semi-border: Migratory Divorce between Habsburg States before 1918

Migratory divorce is the practice of moving from one place where divorce is difficult to someplace where it is easier. It is a phenomenon that began flourishing throughout Europe, the United States, and Latin America in the second half of the nineteenth century, as cultures around marriage and divorce shifted and states simultaneously started secularising their family laws.⁸ Popular lore and mid-twentieth-century Hollywood films have cemented in the American imagination the idea of Reno, Nevada, as the capital of 'divorce tourism', but hotspots for divorce law 'forum shopping' have existed in many places where secularly oriented legal systems formed in close proximity to more religiously oriented states, usually Christian and, especially, Catholic.⁹ What distinguished general migratory divorce practices from divorce mills were the requirements of how long and how consolidated a migration needed to be before a divorce could be finalised. For example, moving to divorce-available France, Switzerland, or the German Empire for a legal dissolution of marriage was no easy business in the nineteenth century.¹⁰ It usually required years of paperwork and a change of permanent family residency, something that was neither viable nor enticing to most frayed family units. Divorce mills, on the other hand, were locales that had legislative loopholes that permitted divorce without true long-term migration. They were not humanitarian endeavours offering legal services for unhappy families in need; they were organised around making as much money as possible. Lawyers profited from these arrangements, of course, but so did a whole range of subsidiary service providers, including chambers of commerce, real estate agents, hotels, restaurants, legal guarantors, state offices, and, sometimes, religious authorities.

Until 1867, Habsburg Europe was the last place one would go for a migratory divorce, let alone a divorce mill. Explicitly organised as a Catholic state, Habsburg divorces were only available to

⁷ 'Golden passports' denote opportunities for individuals to obtain citizenship (and therefore access to a state's laws) purely based on monetary investment. For an absolutely fascinating study of all the different kinds of golden passport situations besetting the twenty-first century world, see: Atossa Araxia Abrahamian, *The Cosmopolites: The Coming of the Global Citizen* (New York: Columbia Global Reports, 2015). For a country-by-country analysis of European countries offering citizenship rights in return for substantial capital investment, see: Laure Brillaud and Maira Martini, *European Getaway: Inside the Murky World of Golden Visas* (Berlin: Transparency International, 2018).

⁸ An excellent overview of what 'migratory divorce' means and how geographical proximity to different legal systems encourages the practice is available here when discussing US family laws: Michael J. Higdon, 'If You Grant It, They Will Come: The History and Enduring Legal Legacy of Migratory Divorce', *Utah Law Review* (University of Tennessee Legal Studies Research Paper No. 408) (2020).

⁹ In the early twentieth century, places like Mexico, Cuba and Reno, Nevada, became well-known capitals for quickie divorces. See Rollo Bergeson, 'The Divorce Mill Advertises', *Law and Contemporary Problems* 2, no. 3 (1935): 348–59. For an excellent study of how a migratory divorce regime was transformed by local actors into a divorce mill industry, see: Alicia Barber, *Reno's Big Gamble: Image and Reputation in the Biggest Little City* (Lawrence: University Press of Kansas, 2008).

¹⁰ Before 1900, in the Protestant areas of the German Empire, divorces and remarriages were relatively easy to get if a man was seeking a divorce but almost impossible for a woman to obtain because of how paternalistic residency laws were upheld. See: Christian Neschwara, 'Eherecht und "Scheinmigration" im 19. Jahrhundert: Siebenbürgische und ungarische, deutsche und Coburger Ehen', *BRGÖ (Beiträge zur Rechtsgeschichte Österreichs)* 2, no. 1 (2012): 107.

registered members of faiths that permitted divorce: Jews, Protestants, Orthodox Christians, and Muslims subject to the laws of the Habsburg Monarchy could divorce under prescribed circumstances; Catholics could not.¹¹ Nor was conversion an option; divorce was legal for ex-Catholics only if they had not been Catholic when they married. Catholics could legally separate, however.¹² Everywhere in Habsburg Europe, from Lombardy to Bukovina, dissatisfied couples could apply to the state for the separation of bed and board, which essentially severed husband and wife as a legal or economic unit. Once a court had issued a separation of bed and board, spouses could live their lives separately wherever and however they chose, but they could not remarry or legally create new family units. Once married, any relationship with someone besides one's registered spouse – regardless of how long it lasted – was considered adulterous and could not be legally recognised until death severed the first registered union. For Catholics in the Habsburg lands, the ability to divorce was thus less about being permitted to leave a spouse and more about being able to marry a new one.

So, Habsburg Europe was the last place Catholics would seek a migratory divorce. But this changed in 1867 when the Habsburg Monarchy separated into two citizenship units – the Austrian and the Hungarian – with different legal codes, administrative practices, and vastly different approaches to how family law should be treated in lands where sizable communities of non-Catholics made their home.¹³ In the Austrian half – which included today's Austria, Czech Republic, Slovenia, parts of Croatia, parts of Poland, parts of Ukraine, and parts of Italy – prior restrictions on Catholic citizens' rights to divorce remained in force. In the Hungarian half – today's Hungary, Slovakia, parts of Slovenia, parts of Croatia, parts of Serbia, parts of Romania, parts of Ukraine, and parts of Austria – things developed quite differently. Hungarian law started by reintroducing the right of religious denominations to control their respective family laws, thereby making it possible for ex-Catholics to divorce according to the rules of their new religion, regardless of whether they had been Catholic when they married. Hungarian Catholics who converted now could divorce.¹⁴ In 1895, things changed even more when the Hungarian Kingdom instituted a completely new divorce law that

¹¹ Much interesting work is starting to come out about how Jewish and Muslim divorces functioned within Habsburg lands. See especially: Lois C. Dubin, 'Jewish Women, Marriage Law, and Emancipation: A Civil Divorce in Late-Eighteenth-Century Trieste', *Jewish Social Studies* 13, no. 2 (2007): 65–92; Sándor Nagy, 'Family Formation, Ethnicity, Divorce, and Marriage Law: Jewish Divorces in Hungary, 1786–1914', *Hungarian Historical Review* 8, no. 4 (2019): 812–42; Ninja Bumann, 'Contesting Juridical Authority: Sharia, Marriage, and Morality in Habsburg Bosnia and Herzegovina', *Austrian History Yearbook* 53 (2022): 150–68.

¹² For an excellent analysis of the 'Culture Wars' between the Catholic Church and the Habsburg state around family laws and divorce, see Ulrike Harmat, "'Till Death Do You Part": Catholicism, Marriage and Culture War in Austria (-Hungary)', in *Marriage, Law and Modernity: Global Histories*, ed. Julia Moses (London: Bloomsbury Academic, 2018): 109–28; Ulrike Harmat, 'Divorce and Remarriage in Austria-Hungary: The Second Marriage of Franz Conrad von Hötzendorf', *Austrian History Yearbook* 32 (2001): 69–103.

¹³ For an excellent discussion of how the dualist Austro-Hungarian state came about and how it worked, see: Pieter M. Judson, *The Habsburg Empire: A New History* (Cambridge, MA: Belknap Press, 2016), esp. 259–68.

¹⁴ There is one notable exception to this, however. Though part of the Habsburg-Hungarian Kingdom, the Kingdom of Croatia-Slavonia retained its internal legal autonomy and kept the Austrian Civil Code of 1811 (which had been formerly introduced in Croatia-Slavonia only in 1852). Croatia-Slavonia before the dissolution of Austria-Hungary included much of today's Croatia, though not Istria, Fiume/Rijeka, Medimurje, or Dalmatia. This meant that while in Habsburg Hungary divorce was available to converted Catholics after 1867, in Habsburg-Hungarian Croatia-Slavonia it was still illegal for Catholics to divorce, as was the case for the other Austrian-controlled parts of today's Croatia. For English-language discussions of the particularities of autonomous Croatian legal practices within the Habsburg Hungarian kingdom, especially as it related to citizenship questions and inheritance practices, see: Ivan Kosnica, 'Hungarians and Citizenship in Croatia-Slavonia 1868–1918', *ATINER'S Conference Paper Series*, No: LAW2014-1355, 2015: 4–13; Ivan Kosnica, 'Local Citizenship in the Croatian-Slavonian Legal Area in the First Yugoslavia (1918–1941): Breakdown of a Concept?', in *Modernisation, National Identity and Legal Instrumentalism, Vol. II: Public Law*, eds. Michał Gałędek and Anna Klimaszewska (Leiden: Brill, 2020): 171–91; Mirela Krešić, 'Intestate Succession of Female Descendants According to the Austrian General Civil Code in the Croatian-Slavonian Legal Area, 1853–1946', *Belgrade Law Review* LVIII, no. 3 (2010): 121–36. For a fascinating discussion of the problems of creating a unified family law in interwar Yugoslavia because of the different legal regimes of Croatia-Slavonia, Hungary, Serbia, Bosnia/Dalmatia and Montenegro, see: Mirela Krešić, 'Much Ado About Nothing: Debates on the Type of Marriage in Yugoslavia between the Two World

provided secular, state-sanctioned divorce options for all citizens, regardless of religion.¹⁵ Having the two parts of the Habsburg Empire operating with almost opposite regulations on divorce transformed it from a place where one would never imagine finding a divorce mill to one that was fertile soil for its development.¹⁶

Though relatively unheard of today, from the 1860s to the 1890s the most famous Habsburg divorce mill was in the former capital of Transylvania, Cluj (today Cluj-Napoca in Romania; then part of the Hungarian Kingdom and commonly known as Kolozsvár or Klausenburg).¹⁷ Cluj figures heavily in Central European history not just because it occupied a fraught place in contending Hungarian and Romanian nationalist ambitions, but also because it was the capital of one of the only principalities in Europe where four different religions – Catholicism, Lutheranism, Calvinism, and Unitarianism – had equal rights of autonomous administration.¹⁸ The presence of Unitarianism on that list is the key to why Cluj was the primary destination after 1867 for Austrian Catholics looking for a quickfire divorce and remarriage.¹⁹ Just as Hungary's relationship within Habsburg Europe was completely reconfigured in 1867, so, too, was Transylvania's. Once an autonomous principality under Austrian military occupation, after 1867 Transylvania was directly joined to the Kingdom of Hungary, adding the Unitarian Church to Hungary's mosaic of officially recognised religions. Since religious courts for most other Protestant denominations already existed throughout Hungary, their administrative procedures replicated the structures of the bureaucratic mapping of the kingdom. So, for example, if a Lutheran divorced in northern Hungary, only the diocese court in Tisza could validate a divorce. But since the Unitarian Church was new to the Hungarian

Wars', in *Kulturkampf um die Ehe: Reform des europäischen Eherechts nach dem Großen Krieg*, ed. Martin Löhnig (Tübingen: Mohr Siebeck, 2021), 199–202.

¹⁵ For more information on changing Hungarian citizenship and family law practices after 1867, see: Anna Loutfi, 'The Family as a Site of Cultural Autonomy and Freedom: Anxieties in Legal Debates over State Regulation of Marriage in Hungary, 1867–1895', *Women's History Review* 20, no. 4 (2011): 599–613; Eszter Cs. Herger, 'The Introduction of Secular Divorce Law in Hungary, 1895–1918: Social and Legal Consequences for Women', *Journal on European History of Law*, no. 2 (2012): 138–48; Norbert Varga, 'The Framing of the First Hungarian Citizenship Law (Act 50 of 1879) and the Acquisition of Citizenship', *Hungarian Studies* 18, no. 2 (2004): 127–53; Robert Nemes, 'The Uncivil Origins of Civil Marriage: Hungary', in *Culture Wars: Secular-Catholic Conflict in Nineteenth-Century Europe*, eds. Christopher Clark and Wolfram Kaiser (Cambridge: Cambridge University Press, 2003): 313–35; Moritz Csáky, *Der Kulturkampf in Ungarn. Die Kirchenpolitische Gesetzgebung der Jahre 1894/95* (Graz: Böhlau, 1967).

¹⁶ Sándor Nagy, 'One Empire, Two States, Many Laws: Matrimonial Law and Divorce in the Austro-Hungarian Monarchy', *The Hungarian Historical Review* 3, no. 1 (2014): 190–221.

¹⁷ 'Transylvanian marriages' or 'Siebenbürgen Ehen' were divorces processed through Transylvania's capital, Cluj, and they were quite well-known in the late nineteenth century among people who followed the newspapers. In the historiography of the late Habsburg Empire, they are also fairly well-known, with some of the most important works analysing the phenomenon, including: Harmat, 'Divorce and Remarriage'; Neschwara, 'Eherecht'; Sándor Nagy, 'Osztrák válások Erdélyben 1868–1895: Otto Wagner 'erdélyi házassága'', *FONS XIV*, no. 3 (2007): 359–428; Sándor Nagy, 'Indivisibiler ac inseparabiliter? Österreichische Scheidungen in Klausenburg (1868–1895). Otto Wagners Siebenbürger Ehe', in *Studien zur Wiener Geschichte*, ed. Karl Fischer (Vienna: Jahrbuch des Vereins für Geschichte der Stadt Wien, 2018): 75–157.

¹⁸ The historiography of Transylvania and the national conflicts surrounding it in the nineteenth and twentieth centuries is vast and has had significant implications in methodological approaches to the studies of nationalism, administration, diplomacy, culture, and gender beyond the region as well. Some of the most well-known titles include: Rogers Brubaker, *Nationalist Politics and Everyday Ethnicity in a Transylvanian Town* (Princeton: Princeton University Press, 2006); Holly Case, *Between States: The Transylvanian Question and the European Idea during World War II* (Stanford: Stanford University Press, 2009); Gábor Egyri, 'Wie Siebenbürgen verschwand? Ungarn, Rumänien und der "Transsilvanismus"', *Die Europäische Rundschau*, no. 2 (2020): 45–51; Gábor Egyri, 'Navigating the Straits: Changing Borders, Changing Rules and Practices of Ethnicity and Loyalty in Romania after 1918', *The Hungarian Historical Review* 2, no. 3 (2013): 449–76; Gábor Egyri, 'Unholy Alliances? Language Exams, Loyalty, and Identification in Interwar Romania', *Slavic Review* 76, no. 4 (2017): 959–82; Irina Livezeanu, *Cultural Politics in Greater Romania: Regionalism, Nation Building and Ethnic Struggle, 1918–1930* (Ithaca: Cornell University Press, 1995); Anca Parvulescu and Manuela Boatcă, *Creolizing the Modern: Transylvania across Empires* (Ithaca: Cornell University Press, 2022).

¹⁹ For an excellent discussion about the importance of the region's multi-religiosity, and Unitarianism in particular, see Anca Parvulescu and Manuela Boatcă, 'God is the New Church: The Ethnicization of Religion', in Boatcă, *Creolizing the Modern*, 157–80.

Kingdom, its main court in Cluj ruled on all Unitarian family law procedures, regardless of where the Hungarian-Unitarian citizen in question held their registered domicile.²⁰ Thus anyone with Hungarian citizenship who converted to Unitarianism would be served by the Unitarian church court in Cluj, no matter where they lived or for how long, while members of most other faiths in Hungary were adjudicated according to their real-time residence.²¹

For already converted Hungarian ex-Catholics living in the Hungarian Kingdom, the strange pan-Hungarian authority of Cluj's Unitarian Church meant little; ex-Catholic Lutherans or Calvinists could sue for divorce wherever they were a registered member of their religious community. But for Hungarian Catholics converting purely to obtain a divorce, the Unitarian option proved attractive because conversion to Unitarianism was relatively easy, requirements for divorce and remarriage rather simple, and there were no local religious authorities around to monitor the validity of spiritual conversion. For Austrian Catholics looking to get a quick divorce by 'going Hungarian' just on paper, this loophole of a religious court that required no predetermined residency to oversee a conversion, recognise a divorce, and authorise a remarriage was an opportunity that drew in most of the Transylvanian migratory divorce clientele.²²

As Margarete Grandner and Ulrike Harmat have rightly observed, figuring out precisely how the Cluj divorce mill worked in real terms is complicated because 'going Hungarian' and 'going Unitarian' to wiggle out of Austrian divorce proscriptions verged on illegality, if not outright immorality.²³ People often tried to keep their Transylvanian remarriages under wraps, not just because they didn't want their intimate lives on display, but because switching Habsburg citizenships could endanger livelihood and status, as many government subsidies and positions presupposed Austrian citizenship.²⁴ Historian Sándor Nagy has shed light on what many tried to hide by combining a sleuth's technique of 'following the people' with a sophisticated historical analysis of legal, religious, and other archival sources.²⁵ Perhaps the easiest way to sum up his findings is to give a quick overview of how one of the Habsburg Empire's most prominent and talented architects, Otto Wagner (1841–1918), managed to get a Cluj divorce in time to marry his pregnant mistress before she gave birth to their first child in 1884.²⁶

Wagner's extramarital relationship with his daughter's governess, Louise Stiffel (1859–1915), began long before he sought out the Transylvanian divorce mill. He and his estranged first wife, Josefine Domhart (1847–89), had put through the paperwork for a legal separation of bed and board in the Vienna courts two years before Wagner and his new fiancée arrived in Cluj. Stiffel's pregnancy sped up Wagner's efforts to start a new marital life, and he was determined that bureaucratic inertia would not tarnish his child with illegitimacy. The primary obstacle was not religious conversion to Unitarianism but switching his Austrian citizenship to Hungarian citizenship fast. Covering all his bases, Wagner frantically tried three different tactics simultaneously. He applied to be recognised as

²⁰ Harmat, 'Divorce and Remarriage', 80–81.

²¹ Nagy, 'Osztárak', 360; Harmat, "'Till Death'", 114.

²² We have no exact total number for those Austrian Catholics who converted to Unitarianism to obtain a Transylvanian marriage, but Sándor Nagy estimates that between 1868 and 1895 it was about 226, though these numbers reflect only 'divorced marriages' validated, not divorces themselves, and identifying who was 'Austrian' or not remains difficult. Nagy, 'Osztárak', 373; Nagy, 'Indivisibilität', 83.

²³ Margarete Grandner and Ulrike Harmat, 'Begrenzt verliebt. Gesetzliche Ehehindernisse und die Grenze zwischen Österreich und Ungarn', in *Liebe und Widerstand. Ambivalenzen historischer Geschlechterbeziehungen*, eds. Ingrid Bauer, Christa Hämmerle and Gabriella Hauch (Vienna: L'Homme Schriften, 2005): 287–304; Nagy, 'Osztárak', 378–89.

²⁴ Neschwara, 'Eherecht', 105.

²⁵ The following summary of Nagy's work uses the two pieces he published in Hungarian and German: Nagy, 'Indivisibilität'; Nagy, 'Osztárak'.

²⁶ Otto Wagner is considered the leading representative of the architectural side of the Vienna Secession movement and is most directly identified with the Art Nouveau style typified not just in Viennese buildings and urban planning but also throughout all the Habsburg lands. For more on him, see: Carl E. Schorske, *Fin-De-Siècle Vienna: Politics and Culture* (New York: Vintage Books, 1981); August Sarnitz, *Otto Wagner: 1841–1918. Wegbereiter der modernen Architektur* (Köln: Taschen, 2005).

a Hungarian citizen, citing his father's Hungarian status at Wagner's birth. The argument here was that, as both Austrian and Hungarian citizenship was determined by patrilineal lines, he should already be considered a Hungarian citizen. Wary that this might not work (Wagner's father's Hungarianness was from before 1867 and since then Wagner held Austrian citizenship, after all), he also applied for Hungarian citizenship by showing that he had executed commissions in Budapest for years and now owned an architectural studio there (he did not mention the legal Viennese residency he had held throughout this time). And, finally, aware that there were many reasons why these first two strategies might not yield results, the forty-two-year-old Wagner had himself legally adopted by the seventy-year-old retired Hungarian Finance Ministry official János Freudhoffer (1813–98), with a proviso that the adoption would entail no other economic or legal consequences except those of asserting family (and thereby citizenship) status.

In the end, Wagner's multipronged strategy to secure Hungarian citizenship proved unnecessary; almost simultaneously Hungarian authorities accepted all three options with little fuss. Within less than a month of obtaining citizenship, Wagner converted, divorced, and remarried with the blessing of a Unitarian minister. The newlyweds quickly returned to Vienna, where they set up their marital home and their firstborn was recognised as legitimate. Meanwhile, Josefine Domhart, Wagner's first wife, followed his example. Because the Catholic Church did not recognise Wagner's divorce and since, as a Catholic, Domhart knew that the Austrian state would not recognise her remarriage, she, too, went to Budapest, got herself adopted to obtain Hungarian citizenship, and then converted to have her divorce and remarriage validated. Unfortunately, Domhart did not enjoy a long domestic life with her new banker husband; she died in 1889 shortly after remarrying. Her untimely passing helped conclude Wagner's Transylvanian episode, however: now that his first marriage was dissolved by death, he quickly reconverted to Catholicism, reobtained his Austrian citizenship, and confirmed his Catholic marriage vows with his already-wife Stiffel. Throughout Wagner's life and in the many biographies written about him thereafter, his Cluj divorce-mill story was shushed away. It had got Wagner what he wanted when he needed it; when he no longer needed it, it was pushed under the rug.

Clearly Wagner's extraordinary clout, bank account, and influence fortified his manoeuvres around church, citizenship, and state authorities. But many wealthy Austrian Catholics used the same strategies, especially the adoption-for-citizenship loophole. Both men and women increasingly boarded the train to Budapest, paid someone to adopt them, then worked with the Cluj courts to dissolve their prior marriages and sanctify their new ones. Though Wagner succeeded in keeping his divorce transactions private, reports in Austria and Hungary on the general phenomenon of 'Transylvanian marriages' began to be noticed by newspapers and even the Austrian parliament. Some decried the practice; others poked fun at it; some used the dailies to advertise a willingness to offer their services to facilitate Transylvanian marriages, for a fee.²⁷ By the mid-1880s, agencies began popping up in Vienna offering to negotiate all the different parts of the divorce-mill procedure that had driven Wagner to a frenzy because of its complexity.²⁸ Those agencies flourished because there was money to be made. It required close to 3,000 florins to cover the costs for lawyers, church processing fees, state processing fees, witness fees, real estate fees, and all the in-between services needed to manipulate legal loopholes to serve private interests. In 1890, the average Vienna savings account held 116 florins per capita, less than 1/25th of what it cost to bankroll a Transylvanian marriage.²⁹ To say few people had 3,000 florins to spare in the late nineteenth century is an understatement; to say that many people saw money to be made and wanted to get their slice of the divorce-mill pie is another. It should come as no surprise that the stated professions of most of the newly converted-divorced-remarried in the Cluj records were 'landowner', 'industrialist', 'merchant', and a myriad of feudal titles. Also

²⁷ Harmat, "Till Death", 114. Apparently, a satirical play by Valery Grey was also staged in 1911 on 'Transylvanian marriages' and was performed in the Workers' Home in the Viennese district of Favoriten. The play is about a married couple accused of bigamy. Harmat, 'Divorce and Remarriage', 84.

²⁸ Nagy, 'Oszták', 394–5.

²⁹ Michael Pammer, 'Economic Growth and Lower Class Investments in Nineteenth Century Austria', *Historical Social Research/Historische Sozialforschung* 25, no. 1 (2000): 30.

unsurprising is the increasing reports of Budapest men who served as the adopted father to anywhere between ten to fifteen fully grown men and women, most of whom had listed Vienna or Prague as their place of prior residence.³⁰ Making new fake families through adoption was undoubtedly the easiest way to get the Hungarian citizenship required to make new, real second families through divorce. And apparently there were plenty of Hungarian adoption-daddies willing to serve (and be paid).³¹

In 1895, when Hungary secularised its divorce law, the pilgrimages to Cluj slowed down, but the divorce mills did not. They just scattered across mainland Hungary.³² Agencies in Austria continued to service well-heeled Catholic men and women hoping to remarry; men in Hungary continued to make a pretty penny by adopting Austrians to give them citizenship; lawyers, witnesses, and real estate agents continued to amass fees.³³ The only thing that changed was that the Unitarian Church and Cluj lost its monopoly. Now any Austrian Catholic who could obtain citizenship through someone and show enough economic stability to reassure Hungarian officials could get divorced and remarried wherever they pleased. The only two burdens that remained besides the financial one was the potential risk of giving up Austrian citizenship and the fact that the Catholic Church would not recognise these new, post-divorce families. For those dedicated to state service and/or those who were truly devout, these were real burdens that probably dissuaded them from ‘going Hungarian’ to free themselves of unhappy unions.³⁴ Nonetheless, by the beginning of the twentieth century, the divorce mill servicing mostly Austrian Catholics had expanded from a provincial centre in Transylvania to encompass the vast pre-1918 Hungarian Kingdom, from the Carpathian Mountains in the east to Fiume on the Adriatic Sea in the west.

Continuing a Habsburg Practice, with ‘Improvements’: Fiume’s Postimperial Divorce Mill

Whether Salvatore Bellasich learned how to run a Habsburg-Hungarian divorce mill from reading the newspapers, studying law in Budapest, or helping process divorces for Austrian citizens in Habsburg-Hungarian Fiume before the First World War is hard to say; he left no statement on the matter. But there can be little doubt that he knew the basic precepts and expertly adapted them to fit Fiume’s post-1918 microstate status.³⁵ Under his supervision, Fiume processed more divorces in just a year than its Cluj precursor had in ten years. By 1924, Fiume had validated well over 1,000 divorces in a three-year period.³⁶ As a point of comparison, between 1909–15, in Fiume an average

³⁰ In Habsburg Hungary and Austria (as was the case in most of Europe), citizenship was determined by the male head-of-household, and therefore only men could adopt someone to provide them with the opportunities for citizenship acquisition. For a fascinating discussion of what the gender implications of household/citizenship regulations had on the liberal, individual-rights-oriented Habsburg civil codes of the nineteenth century, see: Jana Osterkamp, ‘Familie, Macht, Differenz. Familienrecht(e) in der Habsburgermonarchie als Herausforderung des Empire’, *L’Homme. Europäische Zeitschrift für Feministische Geschichtswissenschaft* 31, no. 1 (2020): 17–34.

³¹ Another reason why adoption proved the easiest way to obtain citizenship was because adoption immediately also provided ‘*Heimatrecht*’ or pertinency, which was a special Habsburg legal category in between domicile and state citizenship. For more on this see: Reill, Jeličić, and Rolandi, ‘Redefining Citizenship’; Pieter M. Judson, ‘Citizenship without Nation? Political and Social Citizenship in the Habsburg Empire’, *Contemporanea* XXI, no. 4 (2018): 633–46.

³² Harmat, ‘Divorce and Remarriage’, 87; Neschwara, ‘Eherecht’, 107.

³³ Harmat, ‘Divorce and Remarriage’, 88.

³⁴ Nagy, ‘Osztrák’, 378–88.

³⁵ Fiume’s relationship to Habsburg Hungarian family law, marriage law and divorce law before 1918 was intense. Locals either willingly accepted the reforms and celebrated Hungary’s modern state system or rejected its attack on the Catholic Church’s authority to protect the family. For more on this see: Péter Techet, *Umkämpfte Kirche: Innerkatholische Konflikte im österreichisch-ungarischen Küstenland 1890–1914* (Göttingen: Vandenhoeck & Ruprecht, 2021); Péter Techet, ‘Verzahnung kirchen- und nationalpolitischer Frontlinien in Fiume/Rijeka: “Liberale” Ungarn und Italiener zur Zeit des ungarischen “Kulturkampfes” (1894/1895)’, in *Österreich-Ungarns imperiale Herausforderungen: Nationalismen und Rivalitäten im Habsburgerreich um 1900*, eds. Bernhard Bachinger, Wolfram Dornik and Stephan Lehnstaedt (Göttingen: V&R unipress, 2020): 295–312.

³⁶ The archival holdings of divorces processed in Fiume is incomplete, with much missing from the period of 1923–4. The author’s own research confirms the figures provided here and below in Nenad Hlača, ‘Razvod braka u Rijeci početkom 20. Stoljeća’, *Zbornik Pravnog fakulteta u Rijeci* 8 (1987): 12–14.

of thirty-seven divorce suits were brought annually, while in 1922 alone 466 marriages were dissolved. Day-to-day life in Fiume was inundated with everything to do with divorce and remarriage, with 28 per cent of all cases in Fiume's courts dealing with divorce and an average of 420 new marriages registered. As another point of reference, in 1922 in Fiume there were around 9.7 divorces and eight marriages per 1,000 inhabitants, while a hundred years later, in the United States of 2021, the figures were 2.5 divorces and six marriages per 1,000.³⁷ Given that the city-state had fewer than 50,000 inhabitants, the numbers are even more astounding; its population was dwindling, not growing; and divorce was much more stigmatised in the early twentieth century than today. Nonetheless, people in 1920s Fiume divorced at a rate almost four times higher than in the United States of the 2020s.

In recognition of his role in bringing the divorce boom to post-1918 Fiume, the city's newspapers called Bellasich *'Il mago del divorzio'* or *'the wizard of divorce'*.³⁸ The logic for this nickname was that Bellasich had seen something in Fiume that no one else had. When Fiume's official state flags started blowing in the wind in 1921, Bellasich invented an industry seemingly out of thin air. No doubt the rapid success of this endeavour did feel touched by magic, as pretty much the rest of Fiume's commercial enterprises had shrivelled up during the war and the immediate postwar period.³⁹ But, as we have seen, migratory divorce mills were not new to Bellasich's region. In fact, the way he organised Fiume's postwar operation replicated much of what existed previously: he used the 1895 secular Hungarian family laws implemented during Habsburg times; as in Habsburg times, the lynchpin of the operation was the ability to quickly manipulate and switch citizenship; and the imagined clientele – neighbouring citizens of a Catholic state – was the same. But there were also differences: the specific clients were different, as were the precise workarounds for citizenship restrictions and the way divorces were processed.

The biggest shift between the pre-1918 Hungarian models and the post-1918 Fiume model was the customer. Before, Austrian Catholics were the almost universal client for migratory Hungarian divorces. In part this was because of the structures that linked the two Habsburg states: a common currency, related banks, linked transportation networks, legal professionals versed in both systems, freedom of movement and residency between the states, common language practices, geographical proximity and cultural networks that crisscrossed the Danubian world rendered *'fake migration'* between Austria and Hungary relatively easy to contemplate and achieve. After 1918, Fiume's divorcees were still those who were kept from divorce by their state's Catholic-dominated legal system, but instead of Austrians, it was citizens from the predominately Catholic Kingdom of Italy.

There is not the space here to explain all the reasons Italians became the new, primary client for Fiume's divorce mill, so a summary statement must suffice. As in pre-1918 Austria, in the Kingdom of Italy a separation of bed and board was available to unhappily married Italians, but no Italian citizen – not even Jews, Muslims, Orthodox Christians, or Protestants – could get a divorce.⁴⁰ Italians eager to remarry flocked to Fiume because in the new post-1918 order, Fiume functioned almost like an Italian mandate-state: Italian military forces were charged by the League of Nations to protect the microstate's sovereignty; Italy buttressed Fiume's economy; Italian nationalists ran its government; its official language was Italian; a majority of its populace cited Italian as its mother tongue; transportation networks between Fiume and Italy increased while those between Fiume and the rest of the world shrank; and perhaps most importantly, Fiumian elites like Bellasich *wanted* Italians to come to Fiume. That is why Bellasich and his Fiume cronies only reached out to lawyers in Italy to explain how the divorce mill could help their clients. That is why they only sent information to newspapers in the Kingdom of Italy declaring that Fiume was open for those seeking divorce. And that is why – surprise, surprise – almost

³⁷ 'National Marriage and Divorce Rate Trends', Centers for Disease Control and Prevention, 2022 (accessed 29 Apr. 2023).

³⁸ 'La Corte d'Appello di Firenze e l'industria fiumana dei divorzi', *La Difesa* (Fiume), 19 Mar. 1923.

³⁹ Giuseppe Parlato, *Mezzo secolo di Fiume. Economia e società a Fiume nella prima metà del Novecento* (Siena: Cantagalli, 2009).

⁴⁰ For an absolutely fascinating book analysing the long history of legal battles in Italy around the question of introducing divorce from the nineteenth to twentieth centuries, see: Mark Seymour, *Debating Divorce in Italy: Marriage and the Making of Modern Italians, 1860–1974* (New York: Palgrave Macmillan, 2006).

all the hundreds of divorces processed in Fiume between 1921 and 1924 were between men and women who had made their families in the Italian peninsula.

The ideal client was not just different for the Fiume divorce mill – the operator of the ‘fake migration for divorce’ scam changed, too. In the prior Hungarian versions, eager divorcees, divorce agencies and all the unknown middlemen necessary to process adoption papers operated the scams that made Hungarian family law applicable to Austrian Catholics. The manoeuvres required for a quickfire divorce were constructed by private citizens against the state. In the Fiume version, however, the state itself subverted citizenship requirements for a profit to facilitate access to Fiume’s family law regime. In other words, once Bellasich had slithered his way into the top offices of his city-country – serving simultaneously as mayor and special consultant on almost every important committee – he and his lawyer cronies got the state itself to work as the prime operator, switching citizenships so legal loopholes would no longer be necessary.

Perhaps the best way to understand how different this state-run mill was from the prior, privately driven ones is to follow Sándor Nagy’s example and focus on a single case. One of the Fiume divorce mill’s most famous clients was Vilfredo Pareto (1848–1923) – a founder of microeconomics, the inventor of the 80-20 principle of causes and outcomes, and the man considered responsible for introducing the word ‘elite’ to social analysts.⁴¹ Pareto’s desire for a quick divorce was different than Wagner’s. He was in his seventies and frail; he had been unwell for years and found travel extremely difficult. As he wrote to a friend in February 1922, in one of his first inquiries about getting a divorce in Fiume: ‘I know very well that no one can know precisely how much longer they will live: but there are probabilities, and for me now chances are for a short space of time’.⁴² Pareto was in a hurry to marry his long-time mistress, Jeanne Régis (1880–1963), to secure her status, her inheritance, and perhaps also to indirectly protect her illegitimate daughter, Marguerite, who many believed was Pareto’s own.

Pareto’s extramarital relationship with Régis had begun almost twenty years before he sought his Fiume divorce. The prior marriage that blocked him marrying Régis had exploded in scandal years before he met her. His first wife, Russian countess Alessandrina (Dina) Bakunin (1860–1940), left Pareto in 1901 while he was away at a conference, taking with her thirty trunks of clothing and her lover – their assistant cook.⁴³ Pareto returned home to *Villa Angora* – his lakeside residence in Switzerland – to find a letter from his wife explaining that she had ‘decided . . . that each of us should take back our freedom . . . I intend to become a Russian subject again, to take back my religion and my name, this fact will make you free and you will be able to remarry. . . . My decision is quite firm and nothing will make me come back.’⁴⁴ Unfortunately, Bakunin was deeply misinformed about what was possible. Pareto was an Italian citizen, and by European citizenship laws, that made Bakunin one, too. She could not just ‘declare’ herself a Russian subject again. Also, although in some cases in Russian-Orthodox Europe a change in religion could open the doors to the dissolution of marriage,

⁴¹ The 80-20 principle, also known as the Pareto Principle, argues that 80 per cent of outcomes derive from 20 per cent of causes, or in layman’s terms, 80 per cent of wealth usually resides with 20 per cent of a population. Joseph A. Schumpeter, ‘Vilfredo Pareto (1848–1923)’, *The Quarterly Journal of Economics* 63, no. 2 (1949): 147–73; Norberto Bobbio, *On Mosca and Pareto* (Geneva: Librairie Droz, 1972). Renato Cirillo, ‘Was Vilfredo Pareto Really a “Precursor” of Fascism?’, *The American Journal of Economics and Sociology* 42, no. 2 (1983): 235–45. For a fascinating new analysis of Pareto’s theories regarding global systems, see: Emanuela Susca, ‘Vilfredo Pareto’s Contribution to a Sociology of Globalization’, in *Classical Sociology Beyond Methodological Nationalism*, ed. Massimo Pendenza (Boston: Brill, 2014): 65–89.

⁴² Vilfredo Pareto, Maffeo Pantaleoni and Gabriele De Rosa, *Lettere a Maffeo Pantaleoni, 1890–1923*, 3 vols. (Rome: Librairie Droz, 1960), vol. 3, 303.

⁴³ Alessandrina Bakunin was related to the famous anarchist Mikhail Bakunin, but their connection was not close. She lived mostly in Italy, where her father, Modesto, served as a consul in Venice. For more on the Bakunin family, see: John Randolph, *The House in the Garden: The Bakunin Family and the Romance of Russian Idealism* (Ithaca: Cornell University Press, 2007).

⁴⁴ Tommaso Giacalone-Monaco, ‘Pareto e la Bakounine’, *Giornale degli Economisti e Annali di Economia* 18, no. 3/4 (1959): 194.

this was not possible for Italian citizens.⁴⁵ So, even though Bakunin had left him at the turn of the century, twenty years later and facing death, Pareto was still stuck in their marriage. He had tried everything he could to remedy the problem as much as Italian laws would allow. Two years after Bakunin's departure, Pareto sued for a separation of bed and board on the grounds of adultery and abandonment.⁴⁶ Meanwhile, lonely and eager for companionship, a fifty-three-year-old Pareto also answered an advertisement in a Parisian newspaper placed by a twenty-year-old French woman seeking a 'wealthy gentleman with whom to pursue good friendship'.⁴⁷ The friendship between Régis-the-solicitor and Pareto-the-applicant grew into cohabitation, and for almost two decades Régis ran Pareto's villa on Lake Geneva, tended to his many needs, and tried to control the odour of his eighteen beloved housecats for whom he had named his villa. When word of Fiume's divorce mill started hitting the papers in 1921, Pareto felt the first stirrings of hope that he could rid himself of Bakunin and give Régis the titles of wife and 'Marchesa Pareto' before his passing. He was Bellasich's ideal client.

Pareto wanted to save as much as possible of what he had so he could leave it to Régis. His priorities were speed, thrift, and as little travel as possible. In a letter to a friend, he wrote: 'I'm willing to spend a couple tens of thousands of lire to get the divorce and a couple thousand to pay off my wife, but not more'.⁴⁸ The approximately 22,000 lire that Pareto conceded he would be willing to pay for a divorce was no small number for the time, almost ten times more than a weaver in Lombardy earned in a year, a figure comparable to the enormous expense Hungarian divorce mills had charged clients in prewar times.⁴⁹ But he was right to worry it might not be enough. In another letter, he compared the time and costs of getting French, Swiss, or Fiumian citizenship, doing the math alongside his discussion of how his investments in Latin America were thriving and what the taxes on his British holdings were doing to his portfolio.⁵⁰ In the end, Pareto realised that Bellasich's Fiume scheme was his best bet. It was faster than the Swiss and French options, the tax implications seemed lower, and since it did not require him to move, it was not just reassuring, considering his health constraints, but cheaper.

Pareto's crusade to obtain a quick divorce proved just as successful as Wagner's had been, because Fiume's version required far less in-person hustling than prior Hungarian versions. Pareto did not need bureaucratic know-how; he just needed access to a modern postal service and a healthy bank account. Letters between *Villa Angora*, Bellasich's Fiume law firm, and Pareto's attorneys in Florence abounded and progress was relatively fast.⁵¹ Around March 1922, Pareto contacted Bellasich. By April 1922, Bellasich had arranged for Pareto to have a registered domicile in the heart of Fiume's city centre, conveniently located at the same address as Bellasich's own law firm, where Pareto likely never spent more than an hour of his life.⁵² By early June 1922, Pareto was

⁴⁵ For more on citizenship and the possibilities for divorce in late imperial Russia, see: Eric Lohr, *Russian Citizenship: From Empire to Soviet Union* (Cambridge, MA: Harvard University Press, 2012); Barbara Alpern Engel, *Breaking the Ties That Bound: The Politics of Marital Strife in Late Imperial Russia* (Ithaca: Cornell University Press, 2011); Gregory L. Freeze, 'Sacred Stories: Religion and Spirituality in Modern Russia', in *Sacred Stories: Religion and Spirituality in Modern Russia*, eds. Mark D. Steinberg and Heather J. Coleman (Bloomington: Indiana University Press, 2007): 146–78; Gregory L. Freeze, 'Bringing Order to the Russian Family: Marriage and Divorce in Imperial Russia, 1760–1860', *The Journal of Modern History* 62, no. 4 (1990): 709–46.

⁴⁶ For details of the Pareto-Bakunin court cases, see: Giacalone-Monaco, 'Pareto'.

⁴⁷ Giovanni Busino, 'Materiali per l'edizione dell'epistolario. Lettere del Pareto a Jeanne Régis', *Cahiers Vilfredo Pareto* 1, no. 2 (1963): 274. This article has the most in-depth information about the Pareto-Régis relationship. For an absolutely fascinating 'look' at what Pareto's domestic life was like in *Villa Angora* with Régis, see: Manon Michels Einaudi, 'Pareto as I Knew Him', *Atlantic Monthly* 156 (1935): 336–46.

⁴⁸ Pareto, Pantaleoni and De Rosa, *Lettere*, 288.

⁴⁹ 'Wages and Hours of Labor', *Monthly Labor Review* 21, no. 4 (1925): 67–8.

⁵⁰ Pareto, Pantaleoni, and De Rosa, *Lettere*, 304.

⁵¹ For two other articles useful in examining Pareto's divorce case in Fiume, see: Giovanni Busino, 'Vilfredo Pareto, cittadino fiumano', *Fiume* 3, no. October (1983): 83–6; Ester Capuzzo, 'Il divorzio nel primo dopoguerra: il "caso fiumano"', in *Dall'Austria all'Italia: Aspetti istituzionali e problemi normativi nella storia di una frontiera* (Rome: La Fenice, 1996): 121–48.

⁵² In Pareto's applications for citizenship and divorce proceedings, he lists the address of Bellasich's law offices as via Cavour 8. Almost all of Bellasich's Italian divorce clients listed this same address. It goes without saying they did not live together

informed that 'by virtue of the exceptional powers conferred by the Constituent Assembly' he was being added to the list of Fiume citizens. Through payment of a required state fee of 1,000 lire (about half a Fiume elementary schoolteacher's yearly salary), plus everything Bellasich billed, just four months after his first inquiry and still living comfortably in Céligny, Switzerland, Pareto was made a Fiume citizen. Less than a month after that, Bellasich submitted Pareto's petition for divorce. Three months later, on 15 September 1922, the Fiume courts declared Pareto divorced. By the next year, Switzerland had recognised and registered the verdict. On 19 June 1923, Pareto celebrated his nuptials with Régis, hosting an intimate group of friends for a specially prepared feast at *Villa Angora*, featuring his renowned wine cellar's most valuable bottles.⁵³ Two months later, Pareto died.

On the surface, Bellasich's divorce mill provided everything Pareto needed. But almost immediately after his divorce was proclaimed, Pareto learned that things would not proceed as easily as he had hoped, and this is because of the legal intricacies around citizenship that it appears Pareto did not quite understand. In a letter to a friend, he had declared '[t]he new conditions of the free city of Fiume have been an enormous luck for me. I couldn't acquire Fiume citizenship when it was a Hungarian city; it became possible for me, when it became a "duplicate" (*duplicato*) of Italian citizenship'.⁵⁴ Though Bellasich may have sold him this idea, Pareto's understanding of his 'luck' was completely mistaken. There was no such thing as 'duplicate' or double citizenship in 1920s Italy or Fiume. Instead, there was a willingness to sell well-off Italians Fiume citizenship quickly and seamlessly, with care only for how much money could be made and not for what the 1900 Hague Conference on Private International Law dictated around laws concerning domicile, citizenship and divorce.⁵⁵ The Hague Conference – underwritten by some of Italy's most important legal experts and conducted two decades before Fiume had gained its postimperial sovereignty – said that for divorce to be legal both spouses had to be citizens of the state issuing the divorce. If they weren't, divorce could only be provided locally if the laws of a person's citizenship accorded to the norms of a local court's decision. Fiume did not apply these rules to its family law regime; Italy did. And Bellasich's Fiume sold Italians the citizenship and divorces they sought ignoring completely any repercussions their clients might face in their true home countries.

This difference in approach between Fiume and Italy was an issue for Pareto. From the beginning, Bellasich had indicated that it would be better if Pareto's first wife also got Fiume citizenship.⁵⁶ As he had done for hundreds of other couples, Bellasich counselled both spouses to apply for Fiume citizenship, then, once obtained, immediately sue for divorce on the grounds of abandonment. The courts gave the spouse cited as the 'abandoner' fifteen days to return to the fictional Fiume matrimonial home; if he or she did not, divorce proceedings would be initiated automatically. Once the abandoner refused to return, the divorce was pronounced two weeks later, without the spouses concerned being required to do anything whatsoever, and also minus the fuss of having to publicise any of the intimacies of the failed marriage. But Bellasich's regular divorce formula required spouses to coordinate: they both had to agree to change citizenship and play along with the abandonment fraud.⁵⁷

in his offices, but most likely they paid to use Bellasich's address for their legal domicile. A review of all the immediate postwar divorce cases show that most lawyers listed their offices' addresses as their clients' domicile, with Bellasich representing one of the two spouses in most cases.

⁵³ Busino, 'Materiali', 303.

⁵⁴ Pareto, Pantaleoni, and De Rosa, *Lettere*, 319. In another letter, on p. 305 he writes: 'for the divorce, you don't need to change citizenship in Fiume. Is that true or am I mistaken?'

⁵⁵ For a very useful synthesis of the different international private law conferences and how they dealt with marriage and divorce, see: Kurt Lipstein, 'One Hundred Years of Hague Conferences on Private International Law', *The International and Comparative Law Quarterly* 42, no. 3 (1993): 553–653.

⁵⁶ Giacalone–Monaco, 'Pareto e la Bakounine'.

⁵⁷ Interestingly, apparently Transylvanian divorce procedures in the areas annexed by post-1918 Romania proceeded with a similar standardisation of legal procedures around abandonment, where spouses looking to divorce used the abandonment cause in an almost formulaic manner, rendering the courts little more than receptacles for divorce petitions. See George P. Docan, *Pentru unificare: Legislatia ungara din Transilvania in comparatie cu legislatia romana* (Bucharest: Editura Tipografiei 'Curierul Judiciar', 1921), 39–43. For more information on postimperial legal practices in successor

This was where Pareto ran into problems. Pareto and Bakunin could not work together because their interests were at odds. In the twenty years that had passed since Bakunin had left her husband in his cat-infested Swiss villa, her position in the world had changed. Her family's wealth disappeared in the Russian Revolution, and she returned to Italy penniless and with eye problems. The Italian citizenship gained from marrying Pareto gave her a right to leave Russia and access Italian state assistance; the Italian Kingdom, however, required Pareto to provide minimal monthly payments to Bakunin so she would not become a ward of the state. When Bakunin learned of Pareto's plans for a Fiume divorce, she demanded a hefty fee for traveling to Fiume to process the paperwork required to apply for citizenship. Refusing to be blackmailed by a woman he despised, Pareto ordered Bellasich to process the divorce without Bakunin having Fiume citizenship. This meant they could not use the 'divorce through abandonment' scheme since Bakunin did not hold a Fiume domicile. In its stead, Bellasich used the records from Pareto's prior court decision of separation of bed and board to prove cause.

As mentioned above, the Fiume courts were utterly uninterested in Pareto's marriage, Italian law, or Bakunin's status; they readily cashed in payments and acceded to Pareto's petition for divorce even though Bakunin remained an Italian citizen and did not appear at court. The Florentine courts, however, refused to recognise the divorce: Bakunin was Italian and Italians could not divorce regardless of what a foreign court decided. Fiume citizenship was not a 'duplicate' or overlay on Italian citizenship; it was its own, separate, foreign category that did not follow the same international agreements on family law that Italy did.⁵⁸ When Pareto realised what had happened, it was too late. He could not pay Bakunin to get Fiume citizenship and then divorce her again, because Fiume already considered him divorced. He was stuck; he was furious at Bellasich; and after fruitlessly trying to find a way to convince the Italian legal system to recognise his new family status, he focused his energies on Switzerland: divorce was legal there, and if his divorce was recognised there, he could remarry and Régis could at least be considered his legitimate wife somewhere. The result was that, upon Pareto's death, Bakunin was the widow Marchesa Pareto in Italy, while Régis was the widow Madame Pareto in Switzerland and Fiume.

The absurdity of one of Italy's most revered sons being divorced in Fiume while still being married in Italy did not go unnoticed. Newspaper articles appeared in both Italy and Fiume. In Fiume a particularly satirical piece reported that '[e]ven the lawyer Bellasich and his associates are concerned, because the Florence Court of Appeals ruling has dealt a serious blow to the shares of their Factory of divorces, which has so far yielded several millions'.⁵⁹ But this concern did not end Fiume's divorce mill operation. Instead, it led to another innovation of mercenary government practices around citizenship and divorce, one that protected the state from any responsibility regarding its inattention to international law. Beginning in late 1922, the Fiume government instituted a new 'transitory' form of citizenship for those seeking a divorce. It required applicants to pay, not just exorbitant fees to the state and all the underlying costs to cover the lawyers and the fake domiciles, but also to submit a notarised document acknowledging that 'this city can cancel my name . . . from the citizenship registry, as well as those of all my family . . . once the goal for which we applied for citizenship is achieved'.⁶⁰

This special form of 'temporary citizenship, valid only until a divorce is finalised' was stunning in its flagrant transactionalism. Fiume would offer citizenship to anyone who wanted to use its family laws, but once the enterprise was over, so, too, was the microstate's responsibility to its client. In practice what this meant was that signing Fiume's temporary citizenship oath qualified a person for divorce

state Romania, see Francesco Magno, 'Diritto e giustizia nella grande Romania. Eredità imperiali, nazionalismo, State-Building (1919–1927)' (PhD thesis, Università di Trento, 2021).

⁵⁸ For an excellent detailed explanation about why the Florentine courts rejected Pareto's divorce, see Capuzzo, 'Il divorzio'.

⁵⁹ 'La Corte d'Appello di Firenze e l'industria fiumana dei divorzi', *La Difesa* (Fiume), 19 Mar. 1923.

⁶⁰ There's an entire file containing scores of these notarised authorisations for the revocation of citizenship once divorces were finalised. They can be found at Državni Arhiv u Rijeci, 541 Općina Rijeka, Izdvojenji predmeti, Odustajanje i prihvaćanje riječke zavičajnosti, 1923.

and remarriage, but it also inscribed a willingness to become stateless once the divorce was proclaimed. We know that when you want a divorce you really want a divorce, but still . . . statelessness?

One might assume that a temporary-citizenship-soon-to-be stateless category might deter people from seeking a Fiume-sponsored divorce, but this was not the case. A year after the press scandal of Pareto's divorce and the introduction of the transitory citizenship option, a rival Fiume political party to Bellasich and his cronies sent a petition to the League of Nations complaining that 'today nothing flourishes here but the obscene, uniquely Fiumian industry, divorce'.⁶¹ And to a certain degree, the petition was correct. The city-state's citizenship-divorce customers increased, now including people from other parts of Europe. Alongside the Italian dukes, barons, counts, professors, industrialists, businessmen and men and women of means who eagerly sent in their renouncement of citizenship once a divorce was finalised, there was a new barrage of similarly notarised documents from France, Austria, Spain and the Kingdom of Serbs, Croats, and Slovenes. Even Janko de Bedeković (1884–1938) – the head of police of the neighbouring Yugoslav town Sušak – applied to be Fiumian 'only for the purpose of being able to dissolve my marriage under the laws in force in Fiume and to contract a new marriage in Fiume'. De Bedeković ended this letter by agreeing to be made stateless: 'I declare that I renounce my Fiumian citizenship as soon as I have obtained a divorce and remarried, and I hereby authorise the Municipal Magistrate to delete my name from the register of Fiumian citizens'.⁶²

To anyone familiar with the deeply conflictual history of Italian and Yugoslav nationalisms related to the interwar border between neighbouring Fiume and Sušak, the idea that the committed Yugoslav nationalist de Bedeković would be willing to become Fiumian is shocking, perhaps even more so than his willingness to become stateless post remarriage. But the two facts have the same explanation: de Bedeković was unafraid of losing his statehood because he felt secure enough to live without the paperwork proving it, at least until his wealth and standing could root him anew in his beloved Yugoslavia. For some, the wait to be reinstated to Italian, French, Spanish, Austrian, or Serb-Croat-Slovene citizenship lasted longer than they expected. For others, it was handled as seamlessly as the initial switch had been. As Ester Capuzzo has shown for the Italians who sought renaturalisation immediately after a Fiume divorce, the process depended on which court in which part of Italy was involved.⁶³ But in the end, the customers of Fiume citizenship-divorce risked it all because they knew their original states would probably allow them back for the same reason they had been allowed in by Fiume in the first place: they were wealthy; they needed little from the state; they owned; they paid taxes; and they had clout.⁶⁴ In the worst-case scenario, those newly divorced-and-stateless would live as foreigners in their own land. Statelessness is far more real for the have-nots than for the rich.

Conclusion: Impoverished Sovereignty Sells What It Has and the Rich Buy

Fiume's 'unique, obscene' divorce-mill industry has faded from historical memory for the same reasons as the one in Cluj: the loophole that drew in clients disappeared and neither customers nor practitioners wanted to draw too much attention to what had been. In the Fiume case, the end came in

⁶¹ Emile Lengyel and Fiume Secretary General of the Legal Government of Fiume Kraljevica, 'Petition sent to the Parliament and Senate of the Kingdom of Italy by a considerable number of citizens of Fiume, citing the implementation of the International Treaty of Rapallo', 10 Aug. 1923, League of Nations Secretariat; Political Section; Registry files (1919–1927): R559-11-1348-30348, League of Nations Archive.

⁶² Janko de Bedeković, 16 Oct. 1922, Državni Arhiv u Rijeci, 541 Općina Rijeka, Izdvojeni predmeti, Odustajanje i prihvaćanje riječke zavičajnosti, 1923.

⁶³ Capuzzo, 'Il divorzio'.

⁶⁴ The list of Fiume's divorce customers is quite astounding once you start looking through the files, including celebrities such as the inventor Guglielmo Marconi, the cinema actor Annibale Ninchi, the colonial architect Saul Meraviglia Mantegazza, and one of Italy's richest bankers, Prince Alessandro Torlonia, just to name a few. Quite a large number of rich and noble women from Rome, Milan, Venice and Florence also appear throughout the entire period suing for divorce against their husbands. For more details about how Marconi approached his divorce and change of citizenship see: Marc Raboy, *Marconi: The Man Who Networked the World* (New York: Oxford University Press, 2016), 522–6.

1924 when Mussolini's Italy annexed the microstate and abruptly installed the fascist laws that existed across the Italian peninsula. Gone were Fiume's prerogatives to bestow citizenship. Gone were its Habsburg-Hungarian secularised family laws that permitted divorce. What was *not* gone, however, were the divorces purchased under Bellasich's tutelage. Whether in response to pressure from the newly divorced or to avoid the mess of invalidating the new families that had been formed post-divorce, the Italian state retroactively validated all the dissolutions of marriage enacted in Fiume and readmitted to the citizenship rolls the former Italians who had gone Fiumian to obtain them, a sort of 'nationalist washing' of the microstate's imperial past. Until divorce was finally legalised in 1970, this was the first and only time that Italian citizens could be divorced, remarried, and still call themselves Italian. This unique set of circumstances meant that, a year after his death, Pareto was finally officially divorced from his detested Russian first wife and fully remarried to his cherished French second one.

I began by asking whether the Fiume regime of mercenary citizenship and migratory divorce was just a last gasp of the Habsburg imperial past or something new, a precursor to today's golden passport schemes. The answer is both. Yes, without the precedent of migratory divorce practices, it is unlikely that Bellasich and his government associates would have known how to set up shop as quickly and expertly as they did after Fiume gained full political sovereignty. It is also true that the legal system they hawked was the Habsburg-Hungarian one they inherited. But the difference between the imperial precursor and its postwar iteration outweighs the obvious commonalities. In Habsburg times, private agents subverted the public laws around citizenship and divorce. In post-Habsburg times, it was the state itself that rendered citizenship and family law a farce to make a profit. Before 1918, it was a story of mercenary adoption-daddies. After 1918, it was a story of a mercenary state.

But does this tension between imperial legacy and golden-passport precursor reveal anything more? I believe it does. Fiume – like today's postcolonial nations whose citizenship is for sale in the Caribbean, Indian Ocean and South China Sea – rose to sovereignty without the means to sustain it.⁶⁵ Fiume's economy, networks, and entire legal system were created by empire. Its development was ensnared by it. Its livelihood depended on it. And then suddenly it was 'free', which meant it was infrastructurally isolated, deeply impoverished, and surrounded by states increasingly interested in isolating or 'deglobalising', as Tara Zahra has shown so convincingly.⁶⁶ Meanwhile, individuals of means seemed ever more willing to think outside the state systems they were in to get what they wanted. Using methods alarmingly similar to the post-1945 neoliberals Quinn Slobodian describes, well-heeled adulterers eager to remarry thought of personal 'freedom' as something that could be obtained by buying *out* of the state.⁶⁷ And, with the plethora of vulnerable, newly (re)formed states created in the wake of the First World War, statelessness was not such a risk for the rich. On the contrary, it promised what Mira Siegelberg describes as a nineteenth-century liberal ideal that statelessness could produce the status of the 'unconstrained individual', someone capable of escaping states that got in the way of private desires.⁶⁸

The brilliance of Bellasich's plan was that he saw that political sovereignty and even statelessness were commodities, which he and his micronation could profit from when almost no other opportunities were left. But his scheme was helped by the fact that the repercussions of this

⁶⁵ Vanessa Ogle's new work on postimperial states' availability to monetize sovereignty in aid of companies and individuals navigating post-1945 global capitalism is opening up new roads into understanding the anchored qualities of today's neoliberalism. See: Vanessa Ogle, "Funk Money": The End of Empires, the Expansion of Tax Havens, and Decolonization as an Economic and Financial Event', *Past & Present* 249, no. 1 (2020): 213–49; Vanessa Ogle, 'State Rights against Private Capital: The "New International Economic Order" and the Struggle over Aid, Trade, and Foreign Investment, 1962–1980', *Humanity* 5, no. 2 (2014): 211–34.

⁶⁶ Tara Zahra, *Against the World: Anti-Globalism and Mass Politics between the World Wars* (New York: W.W. Norton & Company, 2023).

⁶⁷ Quinn Slobodian, *Crack-Up Capitalism: Market Radicals and the Dream of a World without Democracy* (New York: Metropolitan Books, 2023).

⁶⁸ Mira L. Siegelberg, *Statelessness: A Modern History* (Cambridge, MA: Harvard University Press, 2020), 41.

sovereignty-as-commodity scam were not as frightening as what we might assume today when we think of the word 'stateless'. Fiume's mercenary citizens were not facing the condition then besetting millions of refugee Jews, Russians, Armenians, Assyrians, Bulgarians, Turks, Croats, Serbs, Bosnians, Macedonians, Greeks, and the many others who clamoured for Nansen passports after the First World War, hoping to find a country where they could live, work, age, and need-from-a-state legally. In a nutshell, Fiume as imperial legacy and golden passport precursor shows that even after the First World War it was not just the desperate who knew that citizenship was about more than identity and nationhood; it was also about money, laws, and the ability to live as one pleased. The rich and adulterous knew it, too, and bought what an impoverished postimperial political sovereignty was selling, regardless of imperial memories or national loyalty.

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