



George Armstrong Custer. (Source: Library of Congress)

Lore of the Corps

The Court-Martial of George Armstrong Custer

By Dr. Nicholas K. Roland, Ph.D.

*When I was merging upon manhood, my every thought was ambitious—
not to be wealthy, not to be learned, but to be great!*

George Armstrong Custer is one of the most famous and controversial officers in the history of the U.S. Army. A Civil War hero, Custer is likely best remembered for his catastrophic defeat and death at the Little Bighorn on 25 June 1876. His widow and a sympathetic press did much to create a “Custer Myth” in the aftermath of his death, while later examinations of Custer highlighted both his impetuosity as a commander and his role in controversial incidents such as the Battle of the Washita in November 1868. What is generally lesser known is that Custer was court-martialed in 1867, but after less than a year’s suspension, he was restored to his command by Major General (MG) Philip Sheridan. Custer’s court-martial and light punishment raise several “what if” scenarios, both for the Native Americans he fought against and the men of the 7th Cavalry Regiment who ultimately perished under his command.

George A. Custer was born on 5 December 1839 in New Rumley, Ohio, a hamlet lying approximately sixty miles due west of Pittsburgh, Pennsylvania.² He spent much of his boyhood in Monroe, Michigan, before entering the United States Military Academy from Ohio in 1857.³ While at West Point, Custer came close to expulsion each year due to a high number of demerits. He graduated last in his class in June 1861.⁴

While awaiting orders, Custer served as the officer of the day on 29 June 1861, when he failed to stop a fight between cadets.⁵ In his first run-in with the military justice system, a court-martial found him guilty of neglect of duty and “conduct to the prejudice of good order and military discipline.”⁶ Fortunately for Custer, with a war looming and the testimony of his superior officer, Lieutenant (LT) William B. Hazen, to his general good conduct, his punishment was only an official reprimand.⁷ After the intercession of his congressman, Custer found himself carrying dispatches for Commanding General of the Army Lieutenant General (LTG) Winfield Scott, on the eve of the battle of First Manassas.⁸

While his early life and West Point years may have been inauspicious, Custer thrived in combat. He first demonstrated a



Then-LTC George Armstrong Custer with his wife, Elizabeth (Libbie). (Source: Library of Congress)

penchant for bold action during the Union's spring 1862 Peninsula Campaign. His combat exploits gained him notoriety, and he was soon promoted to General George McClellan's staff.⁹ By the summer of 1863, Custer was breveted (temporarily promoted) to brigadier general and took command of a cavalry brigade.¹⁰ In his first action as a brigade commander on 3 July 1863, at the Battle of Gettysburg, he led his outnumbered men in a charge that repulsed Confederate Major General J.E.B. Stuart's cavalry on the Union eastern flank.¹¹ Custer would again clash with Stuart at the Battle of Yellow Tavern in May 1864, with Soldiers under his command killing the Confederate general in the encounter.¹² He later played a key role in the Shenandoah Valley Campaign of 1864 and the Appomattox Campaign of 1865.¹³ While serving in these closing campaigns of the war, Custer gained the admiration of his commander, MG Philip Sheridan. In a show of appreciation, Sheridan purchased the parlor table upon which General Robert E. Lee and LTG Ulysses S. Grant signed the surrender agreement of the Army of Northern Virginia and presented it to Custer as a gift to his wife, Libbie.¹⁴ According to Sheridan's note accompanying the table, "There

is scarcely an individual in our service who has contributed more to bring about this desirable result than your gallant husband."¹⁵

Custer stayed in the Army after the war, eventually finding himself in the Great Plains in 1866 when he was promoted to lieutenant colonel and assigned to the newly formed 7th U.S. Cavalry Regiment.¹⁶ Beginning in the spring of 1867, Custer took part in an expedition against the Native Americans of the Central Plains.¹⁷ Led by MG Winfield Scott Hancock, the campaign's objective was to clear a corridor between the Platte and Arkansas rivers to construct what would become the Kansas Pacific Railway and white settlement along its route.¹⁸

"Hancock's War" marked Custer's first experience with Native American warfare. While he attempted to pursue and bring to battle elements marked as hostile by the Army, Custer was consistently eluded by his enemies. In early summer, LTG William T. Sherman, commander of the Military Division of the Missouri, ordered Custer to search for hostiles in a vast area in western Kansas and the territories of Nebraska and Colorado.¹⁹ Departing Fort Hays, Kansas, on 1 June with 300 men from six troops of his regiment, Custer traveled north to the Platte, then received instructions from Sherman to move south to the forks of the Republican River.²⁰ From the Republican River, Custer was to scout to the northwest and eventually arrive at Fort Sedgwick, seventy-five miles distant, or further west along the Union Pacific Railroad.²¹ In late June, he began to make a series of decisions that would lead to his court-martial.²²

George and Libbie Custer were an intensely devoted couple, with Libbie accompanying her husband as much as possible during his military career. Custer's correspondence during the 1867 campaign reveals his growing concern for Libbie's safety. Several frontier posts were attacked that summer, and word reached Custer's command in late June of a cholera outbreak on the frontier. On 22 June 1867, he wrote to her that "I never was so anxious in my life."²³ After arriving at the forks of the Republican River, Custer seems to have begun to make operational decisions based on his desire to see his wife and ensure her health and safety. At the same time, the grueling campaign revealed chronic issues of discipline, morale,

and mental health within the frontier army of the post-Civil War years.²⁴

While the volunteer armies of the Civil War were highly motivated and predominantly native-born, representing all walks of life, the Regular Army of the American Indian Wars was composed primarily of unskilled laborers, approximately half of whom were foreign-born.²⁵ Unit cohesion was difficult to achieve when operating in small, far-flung detachments on the frontier. Chronic problems with the quality of rations, low pay, grueling duty on isolated posts, and the ability to disappear into the mobile masses of westering settlers contributed to an astounding desertion rate within the Army—as high as 32.6 percent in 1871.²⁶ Custer's own regiment had 512 desertions between October 1866 and September 1867.²⁷ Alcohol abuse was common among both Soldiers and officers. On the march to the Platte in June, Major (MAJ) Wickliffe Cooper committed suicide with his service pistol while drunk.²⁸ Custer would struggle mightily to maintain morale and discipline within his formation during the campaign.

Before departing for the Republican River, Custer sent a letter to Libbie telling her to proceed west from Fort Hays to Fort Wallace, along the headwaters of the Smoky Hill River. With his command at the forks of the Republican River, he decided to resupply from Fort Wallace, approximately an equal distance southwest as Fort Sedgwick was to the northwest.²⁹ He sent a detail to Fort Sedgwick carrying dispatches to explain his need for supplies from Fort Wallace and sent his wagons and a guard detail south to Fort Wallace, with additional instructions to bring Libbie back with the supply train if she was located at the fort.³⁰

Meanwhile, reports of Native American raids along the Smoky Hill River to the south prompted LTG Sherman to send instructions to Fort Sedgwick (Colorado) for Custer to proceed to Fort Wallace (Kansas) rather than remaining further north.³¹ With Custer's detail to Fort Sedgwick already having departed to rejoin him at the Republican River, the post commander dispatched LT Lyman Kidder with a squad of troopers to carry these new orders to Custer.³²

The wagon train returning from Fort Wallace came under attack on 26 June 1867, but it was able to proceed on and

rejoin Custer.³³ Libbie had not been at the fort.³⁴ In accordance with LTG Sherman's original orders, the 7th Cavalry proceeded to a point northwest of Fort Sedgwick, where Custer belatedly learned of LT Kidder's mission and received Sherman's new orders to move south to Fort Wallace.³⁵ Fearing for Kidder's safety, Custer then doubled back to the southeast in a forced march to locate Kidder and reach Fort Wallace. Approximately thirty-five men deserted early on the morning of 7 July before the countermarch began, but there was no time to attempt to recover them.³⁶

After covering fifteen miles by noon, the command stopped for a short rest in the searing heat. At this point, the regiment was verging on mutiny, having been on campaign with poor rations and hardly a break for more than a month.³⁷ In broad daylight, thirteen men deserted the camp. Custer dispatched a party in pursuit with orders to use lethal force.³⁸ Seven on horseback escaped, but the six on foot were ridden down. When one of the deserters raised a carbine, a lightweight rifle with a shorter barrel, to fire on MAJ Joel H. Elliott, the pursuers opened fire. Three deserters were shot, with one mortally wounded. The remainder surrendered. Upon their return to camp, Custer loudly instructed his surgeon not to treat the wounded men but privately told him to attend to the casualties.³⁹ Aware that many in the command had planned to desert that evening, the officers of the 7th Cavalry stood guard that night.⁴⁰ According to Custer, "The effect was all that could be desired. There was not another desertion as long as I remained with the command."⁴¹

While continuing en route to Fort Wallace, Custer's men discovered the mutilated remains of LT Kidder and his detail, massacred by Native Americans on 1 or 2 July 1867.⁴² On 13 July, the 7th Cavalry finally reached Fort Wallace after covering 705 miles in six weeks of campaigning.⁴³ Libbie was still not there, and Custer received no news of her. While Libbie had been foremost in Custer's mind since departing Fort Hays, his concerns over her perhaps now began to impact his judgment.⁴⁴

Custer placed MAJ Elliott in command at Fort Wallace, instructed his company commanders to select a detail and equip it

with the best horses in the command, and departed on the evening of 15 July 1867 with three officers and seventy-two men bound for Fort Hays.⁴⁵ In the estimation of historian Jeffrey D. Wert, Custer's desire to be with Libbie was his overriding concern: "No other explanation of his risking the lives of men in a dangerous ride from Wallace seems credible."⁴⁶ Custer pushed the men relentlessly to the east.

Along the way to Fort Hays, on 16 July 1867, another trooper attempted to desert.⁴⁷ Custer sent Sergeant James Connelly and a detail after the man.⁴⁸ After capturing the deserter, the small group was ambushed by Native Americans while attempting to rejoin the main body. One Soldier was killed and another wounded; both were left behind by the Soldiers as they fled their attackers.⁴⁹ The sergeant reported the attack to Custer, who was determined to keep pushing onward despite his subordinates' pleas to try and locate their fallen comrades.⁵⁰ An infantry detail would later recover the dead Soldier's body as well as his wounded companion.⁵¹

Custer covered the 150 miles to Fort Hays in sixty hours, arriving in the middle of the night. He left most of the men at the frontier post to rest, then departed for Fort Harker with his brother, Tom, and three other men in two ambulances. Along the way, Custer encountered a supply train carrying dispatches instructing him to remain at Fort Wallace, but he interpreted a postscript in the correspondence to indicate that some other orders that he had failed to receive had also been sent. Custer continued to Fort Harker, awakened his immediate superior, district commander Colonel (COL) Andrew J. Smith, at 2:30 a.m., and gave him an update on his operations. After sending telegrams informing higher headquarters of the death of LT Kidder and his party, Custer boarded a train to Fort Riley. He and Libbie were finally reunited on the morning of 19 July 1867.⁵²

The same morning, a now fully awakened COL Smith ordered Custer via telegram to return to his command.⁵³ Due to a train delay, Custer and Libbie returned to Fort Harker on 21 July, where he was immediately arrested for leaving his command without authority. On 27 August, orders for a court-martial came from Army Headquarters in Washington.⁵⁴

Army Headquarters charged Custer with absence without leave (AWOL) and conduct to the prejudice of good order and discipline, with specifications relating to his alleged damage to Government horses for the purposes of private business, the improper use of Army ambulances, and failure to properly respond to the Native American attack on 16 July 1867.⁵⁵ An additional charge of conduct prejudicial to good order and discipline was filed by Captain (CPT) Robert West, an officer with a fondness for alcohol and a strong dislike for Custer.⁵⁶ The specifications for this charge accused Custer of ordering the killing of deserters without trial and preventing the wounded deserters from receiving medical aid, resulting in the death of one of the three wounded.⁵⁷ The court-martial convened on 15 September 1867, and Custer pled not guilty to all charges and specifications.⁵⁸ An old friend from West Point, CPT Charles C. Parsons, 4th U.S. Artillery, served as Custer's legal counsel.⁵⁹

During the trial, Custer argued that he had received verbal orders giving him wide latitude regarding his chosen routes and that his journey to Fort Hays and then to Fort Harker had been spurred by overriding guidance to confer with MG Hancock.⁶⁰ Without reliable postal service or telegraph lines, Custer argued, he could only meet with Hancock in person, necessitating his journey east.⁶¹ Custer claimed that the orders he had intercepted en route to Fort Harker had to be interpreted as incomplete, necessitating his continued journey east.⁶² As to his further movement to Fort Riley to see Libbie, he argued that COL Smith had verbally authorized it.⁶³

Custer also disputed the contention that he had overmarched the horses in his command, demonstrated that the use of ambulances as a mode of travel was common practice for officers in his district, and argued that his response to the Native American attack of 16 July 1867 was appropriate given the circumstances.⁶⁴ He explained that he had believed both Soldiers left behind to have been killed and understood that an infantry patrol would be sent to recover them, only later learning that one man had been left wounded.⁶⁵ He also argued that the odds of overtaking an enemy party after an attack occurring

several miles away were impossibly low and that he could not be charged simultaneously with failing to act against hostile Native Americans and with overworking his horses.⁶⁶ Finally, Custer responded that he had issued an order to kill the deserters to overawe the men in his command, many of whom he suspected of plotting to desert en masse, rather than as a literal command to the pursuers.⁶⁷ Custer introduced evidence showing that his superior, MG Hancock, had issued orders demanding the killing or capture of deserters within his district.⁶⁸ He also claimed that he had not prevented proper medical treatment of the wounded.⁶⁹

The substance of Custer's defense was that while he had perhaps been technically guilty of violating Army regulations in some cases, the circumstances he faced demanded extralegal solutions that were within the purview of a commander in the field.⁷⁰ COL Smith's recollection was unclear as to what he had authorized Custer to do upon his arrival to Fort Harker, but he admitted that he "made no objections to his going" to Fort Riley.⁷¹ On the other hand, Custer's own brother, Tom, a lieutenant in the 7th Cavalry, offered testimony that hurt his brother's contention that he had not literally meant for the deserters to be killed.⁷² From a historian's perspective, much of Custer's defense seems valid. Still, his movements to Forts Hays, Harker, and Riley seem to have used vague and contradictory orders to his own benefit so that he could visit Libbie and allay his concerns for her. On 11 October 1867, the court found Custer guilty of the first charge (AWOL) and the additional charge for unlawful killing of the deserters, ruling that he should be suspended for one year without pay.⁷³

The Custers were dismissive of the trial's results, with Libbie writing that it was "nothing but a plan of persecution for Autie" (Custer's nickname).⁷⁴ The latter charge seems unlikely given Custer's influence with the senior leadership of the Army and friendship with Secretary of War Edwin Stanton. For his part, when approving the findings of the court-martial, then-General of the Army Ulysses S. Grant said: "The reviewing officer, in examining the testimony in the case, is convinced that the Court, in awarding so lenient a sentence for the offences of which the

accused is found guilty, must have taken into consideration his previous services."⁷⁵ LTG Sherman commented that "the levity of the sentence, considering the nature of the offenses of Brvt. Major General Custer if found guilty, is to be remarked on."⁷⁶

Unfortunately for Custer, the trial's aftermath did not allow the case to quietly disappear from the news. Newspapers offered differing opinions on the justness of the trial and its outcome, and a letter from Custer defending himself and criticizing the conduct and composition of the court-martial appeared in an Ohio newspaper on 28 December 1867.⁷⁷ Custer also went on the offensive and filed charges against CPT West for drunkenness on duty.⁷⁸ In a divisive trial, CPT West was found guilty and suspended from rank and pay for two months.⁷⁹ At West's urging, a local court in turn filed murder charges against Custer for the death of the deserter, but the case was ultimately dismissed.⁸⁰

MG Sheridan, ever supportive of his protégé, allowed the Custers to live in his quarters at Fort Riley during the winter of 1868 while he was on leave.⁸¹ As early as April 1868, he attempted to bring Custer back to duty, a request likely denied by Grant due to Custer's public letter criticizing the court-martial. Finally, with a frontier war reignited on the Central Plains in the summer of 1868, Sheridan determined that he needed an aggressive commander to lead the effort.⁸² With LTG Sherman's blessing, on 25 September 1868, MG Sheridan sent orders for Custer to report to his command, cutting short his suspension by two months.⁸³

On 27 November 1868, Custer led the 7th Cavalry in an attack on a large Cheyenne encampment at the Washita River (Texas and Oklahoma).⁸⁴ Reports of Native American casualties varied, but Custer claimed to have killed 103 Cheyenne fighters and taken fifty-three captives.⁸⁵ An influential Cheyenne advocate for peace, Black Kettle, was killed while trying to flee Custer's troopers.⁸⁶ Whether purposeful or inadvertent, nearly all sources agree that women and children perished in the attack, causing some to accuse Custer of perpetrating a massacre.⁸⁷

Presaging later events, after dividing his forces and launching an initially

successful surprise attack, Custer's command came under a severe counterattack from several hundred Cheyenne as well as Arapaho and Kiowa warriors encamped nearby and had to conduct a fighting withdrawal.⁸⁸ MAJ Elliott and twenty men were cut off and killed during the fighting.⁸⁹ Nonetheless, Custer considered the Washita River battle to be a great success.⁹⁰

Custer later took part in Army expeditions to Yellowstone in 1873 and led an expedition in the Black Hills in 1874.⁹¹ The latter action ultimately ignited the conflict known as the Great Sioux War of 1876.⁹² Besides the few skirmishes he had participated in during 1867 and 1873, the Washita River battle was Custer's primary combat experience versus Plains warriors before the Little Bighorn Campaign.⁹³ On 25 June 1876, as part of a large pincer movement against the Sioux and allied tribes on the Northern Plains, Custer impetuously attacked a massive Native American encampment on the Little Bighorn River in what is now eastern Montana.⁹⁴ Having divided his force into four elements before attacking the village from two directions, Custer and his contingent of more than 200 men were cut off, routed, and annihilated by Sioux, Arapaho, and Cheyenne warriors.⁹⁵ The remaining troops of the 7th Cavalry were besieged and suffered heavy casualties until the approach of reinforcements.⁹⁶

The outcome of George Custer's court-martial lends itself to some intriguing counterfactuals. What if he had been removed from command or dismissed from the Army in 1867? A comparison to other court-martial cases in the nineteenth century reveals that some officers of high standing suffered stricter punishments for arguably lesser offenses. For instance, MG John C. Frémont, a popular hero in antebellum America known as the "Pathfinder of the West," was court-martialed in 1848 for failing to recognize the authority of a superior officer in California during the Mexican-American War.⁹⁷ For what was essentially a disagreement over seniority, Frémont was convicted of mutiny, disobedience of orders, and insubordination.⁹⁸ While President Polk exercised his power of clemency, Frémont was incensed and resigned from the Army.⁹⁹ During the Civil



Depiction of Custer's death, created by Henry Steinegger. (Source: Library of Congress)

War, Brevet MG Joseph Warren Revere, grandson of Paul Revere, was court-martialed and dismissed from the Service for allegedly marching his brigade away from the scene of the fighting at the Battle of Chancellorsville. Although President Lincoln reinstated Revere, the convicted officer also chose to resign.¹⁰⁰

Custer was arguably on another level of popularity and influence in comparison to Frémont or Revere, perhaps most crucially within the Army and Federal Government itself. Like his benefactors Sherman and Sheridan, Custer experienced a meteoric rise during the Civil War, and he had the trust of many senior leaders. Custer deflected responsibility for the events leading to the court-martial, referring to it obliquely in his memoirs of his frontier service as “certain personal and

official events,” and he and Libbie clearly believed that his conviction was unjust.¹⁰¹ Despite their objections to the court-martial in both public and private, Libbie informed a friend at the time of the trial that Custer had understood the likely consequences of his actions and risked a court-martial anyway, perhaps with the belief that his status in the Army would protect him from punishment.¹⁰²

Would the disaster at the Little Bighorn have been avoided with someone else in command? Most historians consider Custer's military career to have been marked by a combination of skill, a degree of rashness in combat, and a desire for personal glory. In the words of one historian, “Custer's military philosophy, eminently successful on scores of fields, was to pitch in against any odds and then extricate himself and

his command later if the going got too rough.”¹⁰³ At the same time, a fellow Civil War cavalryman vouched for his prudence, remarking that “He knew the whole art of war.”¹⁰⁴ Whichever of Custer's characteristics as a commander predominated, until 1876, Custer had won fame for himself with repeated battlefield successes. Unfortunately for the men who rode with him, Custer's characteristic failure to take heed of the enemy situation, perhaps spurred on by arrogance from repeated successes and a burning desire for glory, meant that the young general's luck eventually ran out on the fields overlooking the Little Bighorn River.

While it is difficult to parse the evidence at a space of 156 years, in retrospect, Custer's court-martial offers two lessons to Army officers of the 21st century. The first is the importance of

disciplining subordinates appropriately, perhaps especially those who have achieved “rock star” status within an organization. Although he was convicted, Custer seems to have benefited from command influence and favoritism in his sentencing, arguably to the detriment of his men in later years. The second lesson is the danger of unbridled ambition and egocentrism in a military professional. Custer probably behaved the way he did because he believed he could get away with it. Army leaders must guard against these behaviors, both in themselves and in subordinates, lest future lives be lost to leaders who become detached from the fundamental requirements of military leadership. Custer’s court-martial can, therefore, be seen as a cautionary tale about military justice, leadership, and the potentially deadly consequences of the failure to properly discipline popular leaders. **TAL**

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Notes

1. ROBERT M. UTLEY, CAVALIER IN BUCKSKIN: GEORGE ARMSTRONG CUSTER AND THE WESTERN MILITARY FRONTIER 13 (2001) (quoting George A. Custer, 1867).
2. *Id.* at 13-14; EZRA J. WARNER, GENERALS IN BLUE: LIVES OF THE UNION COMMANDERS 108-09 (1992).
3. UTLEY, *supra* note 1, at 15.
4. WARNER, *supra* note 2, at 108-09.
5. JEFFREY D. WERT, CUSTER: THE CONTROVERSIAL LIFE OF GEORGE ARMSTRONG CUSTER 39-44, 312 (1996).
6. WARNER, *supra* note 2, at 422.
7. WERT, *supra* note 5, at 39.
8. Hazen rose to division command in the Civil War and later served on the Western frontier. Despite his testimony on Custer’s behalf, Hazen and Custer disliked one another and became embroiled in a public dispute in 1874. WERT, *supra* note 5, at 39-44, 312.
9. WARNER, *supra* note 2, at 109.
10. *Id.*
11. UTLEY, *supra* note 1, at 24.
12. *Id.* at 28.
13. *Id.* at 30-31.
14. *Id.* at 33.
15. *Id.*
16. LAWRENCE A. FROST, THE COURT-MARTIAL OF GENERAL GEORGE ARMSTRONG CUSTER 6-7 (1968).
17. *Id.* at 16-30.
18. *Id.* at 6-13, 16, 36.
19. WERT, *supra* note 5, at 257.
20. *Id.* at 257-58.
21. *Id.* at 258.
22. *Id.* at 258-59.
23. *Id.* at 259.
24. FROST, *supra* note 16, at 54-55.
25. UTLEY, *supra* note 1, at 26.
26. *Id.* at 27.
27. *Id.* at 99.
28. *Id.* at 42.
29. WERT, *supra* note 5, at 258-59.
30. *Id.*
31. *Id.*
32. *Id.*
33. THE CUSTER STORY: THE LIFE AND INTIMATE LETTERS OF GENERAL GEORGE A. CUSTER AND HIS WIFE ELIZABETH 205 (Marguerite Merington ed., 1950) [hereinafter THE CUSTER STORY].
34. *Id.*
35. *Id.* at 207.
36. WERT, *supra* note 5, at 39-44, 259-60.
37. *Id.* at 259-60.
38. *Id.*
39. *Id.*
40. THE CUSTER STORY, *supra* note 33, at 205.
41. *Id.* at 206.
42. WERT, *supra* note 5, at 260-61.
43. *Id.*
44. *Id.*
45. *Id.*
46. *Id.*
47. *Id.* at 261-62.
48. *Id.*
49. *Id.*
50. *Id.*
51. *Id.*
52. *Id.* at 262.
53. *Id.*
54. *Id.*
55. FROST, *supra* note 16, at 96-103.
56. *Id.*
57. *Id.*
58. *Id.*
59. *Id.*
60. *Id.* at 218-28.
61. *Id.*
62. *Id.*
63. *Id.*
64. *Id.* at 207-14, 228-37.
65. *Id.*
66. *Id.*
67. *Id.*
68. *Id.*
69. *Id.*
70. *Id.* at 149.
71. *Id.*
72. *Id.* at 150-55.
73. *Id.*
74. WERT, *supra* note 5, at 263; THE CUSTER STORY, *supra* note 33, at 213.
75. John O. Shoemaker, The Custer Court-Martial 21 (Dec. 1, 1962) (U.S. Army Command and General Staff College, Fort Leavenworth, Kansas), <https://apps.dtic.mil/sti/pdfs/AD1111857.pdf>.
76. WERT, *supra* note 5, at 263.
77. *Id.* at 264.
78. *Id.*
79. *Id.*
80. *Id.*
81. *Id.* at 266-68.
82. *Id.*
83. *Id.*
84. Stephen Black, *Washita, Battle of the: The Encyclopedia of Oklahoma History and Culture*, OKLA. HIST. SOC’Y, <https://www.okhistory.org/publications/enc/entry?entry=WA037> (last visited Oct. 10, 2024).
85. *Id.*
86. *Id.*
87. *Id.*
88. *Id.*
89. *Id.*
90. *Id.*
91. WARNER, *supra* note 2, at 109.
92. *Id.*
93. *Context and Story of the Battle: Little Bighorn Battlefield*, NAT’L PARK SERV. (Mar. 23, 2023), <https://www.nps.gov/libi/learn/historyculture/battle-story.htm>.
94. *Id.*
95. *Id.*
96. *Id.*
97. Cody K. Carlson, *This Week in History: John C. Fremont is Court-Martialed for Mutiny*, DESERET NEWS (Feb. 3, 2016), <https://www.deseret.com/2016/2/3/20581683/this-week-in-history-john-c-fremont-is-court-martialed-for-mutiny>.
98. *Id.*
99. *Id.*
100. WARNER, *supra* note 2, at 395-96.
101. *See generally* GEORGE A. CUSTER, MY LIFE ON THE PLAINS OR, PERSONAL EXPERIENCES WITH INDIANS (1874).
102. THE CUSTER STORY, *supra* note 33, at 212.
103. WARNER, *supra* note 2, at 110.
104. WERT, *supra* note 5, at 229.